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original
Arkansas
State Claims Commission
DEC 02 2013

BEFORE THE STATE CLAIMS COMMISSION
Of the State of Arkansas

RECEIVED

- Mr.
- Mrs.
- Ms.
- Miss

Daniel Sanders, #094279 Claimant

State of Arkansas, Respondent
Dept. of Correction

Do Not Write in These Spaces	
Claim No.	14-0441-CC
Date Filed	December 2, 2013
	(Month) (Day) (Year)
Amount of Claim \$	25,000.00
Fund	DOC

COMPLAINT

Personal Injury, Pain & Suffering
Mental Anguish, Negligence,
Failure to Follow Procedure

Daniel Sanders, #094279, the above named Claimant, of POB 600, Grady, AR 71644

AR, 71644 990-576-1800 County of Lincoln represented by Pro Se

of n/a n/a n/a n/a n/a n/a n/a n/a says:

State agency involved: Arkansas Department of Corrections Amount sought: \$25,000.00 total for injuries

Month, day, year and place of incident or service: On Feb 15 2012 while working as a assigned inmate laborer at Varner Unit

Explanation: On 2-15-12 I, Daniel Sanders #094279 was a assigned inmate laborer at Varner Unit in 1983 which is the new bldg, Davis Subarea. I was handed a bucket. On this day I was making soap water & pouring chemicals into the soap bucket when some of them splashed on my face getting into my right eye, how did that happen because I, D. Sanders never and the rest of the inmates never issued any safety glasses nor eye wear at all of any kind for protection from chemical splashes or gloves for handling them and the bucket was in bad condition too resulting in damage to my right eye which caused numerous injuries including burn/scarification of my right eye, blurred vision, headaches & increased sensitivity to light & loss of a light in my right eye. Now I'm automatically out of all the chemicals issued which are toxic to us, the inmate laborers. They gave us eye drops like Raxor, Raxor Sparkle Plus, Raxor Lites, Raxor which is caused with 2 to 3 times a day, they chose Raxor Sparkle Plus which I never named in any of my grievances and they did in their response. As you will see I cried over this issue on 1-28-12 about not having any safety glasses or anything else to keep us safe from chemicals but we were told just sign the safety acknowledgment that we had to sign weekly thus falsifying documents. And by their own admission of not providing me any safety glasses this grievance # 77-12-05429 Step 2 which took 76 months for me to get. My injury could have been avoided by just issuing the safety glasses which didn't come until after 2-18-12 on 2-19-12 after I was already injured by all the hazardous chemicals. I used in the soap bucket and Raxor Sparkle Plus when some of them. I'm still suffering from the injuries

As parts of this complaint, the claimant makes the statements, and answers the following questions, as indicated: (1) Has claim been presented to any state department or officer thereof? NO when? n/a & no to whom? n/a & no (Department)

and that the following action was taken thereon: n/a & no

and that \$ n/a & no was paid thereon: (2) Has any third person or corporation an interest in this claim? n/a & no if so, state name and address

and that the nature thereof is as follows: n/a & no (Street or R.F.D. & No.) n/a & no (City) n/a & no (State) n/a & no (Zip Code)

and was acquired on n/a & no in the following manner:

THE UNDERSIGNED states on oath that he or she is familiar with the matters and things set forth in the above complaint, and that he or she verily believes that they are true.

Daniel Sanders #094279 (Print Claimant/Representative Name) Daniel Sanders #094279 (Signature of Claimant/Representative)

FELICIA PIGGEE
NOTARY PUBLIC-STATE OF ARKANSAS
(SEAL) DESHA COUNTY
My Commission Expires 01-31-2021
Commission # 12382202

SWORN TO and subscribed before me at Grady AR

on this 29th day of October, 2013

(Date) (Month) (Year)

Felicia Piggree
(Notary Public)

My Commission Expires: 01 31 2021

(Month) (Day) (Year)

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

DANIEL SANDERS (ADC 094279)

CLAIMANT

V.

NO. 14-0441-CC

ARKANSAS DEPARTMENT OF CORRECTION

RESPONDENT

ANSWER

COMES NOW the Respondent, Arkansas Department of Correction, and for its Answer, states and alleges as follows:

1. Respondent denies liability in this claim and asserts it will hold the Claimant to strict proof on each allegation unless admitted by Respondent. Respondent reserves the right to plead further upon completion of the investigation by internal affairs and requests the matter be held in abeyance until the investigation is complete.
2. The applicable account information required by the Commission is:
 - a. Agency number: 0480
 - b. Cost Center: HCA0100
 - c. Internal Order: 340301
 - d. Fund Center: 509

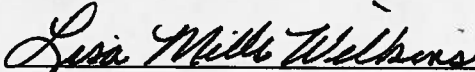
WHEREFORE, for the reasons cited above the Respondent prays that the claim be dismissed with prejudice and that Claimant take nothing, or in the alternative that the matter be held in abeyance until completion of the investigation by internal affairs.

Respectfully submitted,
Department of Correction Office of Counsel

Arkansas
State Claims Commission

DEC 17 2013

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LISA MILLS WILKINS Ark. Bar #87190
Attorney Supervisor
Post Office Box 8707
Pine Bluff, AR 71611
(870)267-6844 Office
(870)267-6373 Facsimile

CERTIFICATE OF SERVICE

I certify that a copy of this pleading has been served this 13 day of December, 2013, on the Claimant by placing a copy of the same in the U. S. Mail, regular postage to:

Daniel Sanders (ADC 094279)
Varner Super Max
PO Box 400
Grady, AR 71644-0400


LISA MILLS WILKINS Ark. Bar #87190

JAN 31 2014

CLAIMANT
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BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

DANIEL SANDERS (ADC#094279)

V.

NO. 14-0441-CC

ARKANSAS DEPARTMENT OF CORRECTION

RESPONDENT

RESPONDENT'S MOTION TO DISMISS

COMES NOW the Respondent, Arkansas Department of Correction, and for its MOTION TO DISMISS, states and responds as follows:

1. Claimant seeks \$25,000.00 for personal injury, pain and suffering, mental anguish as a result of an alleged failure to follow policy and negligence.
2. Claimant has failed to state a cause of action for this claim under ARCP Rule 12(b)(6).
3. Claimant was assigned as a barracks porter. On February 15, 2012, while cleaning a chemical from his bucket, splashed into his right eye. He claims he is blinded in the eye.
4. Claimant fails to state what chemical he was using in the bucket at the time of the splash to his eye.
5. Claimant alleges that the Respondent failed to provide him with safety goggles in violation of ADC policy and the recommendation of the Material Safety Data Sheets ("MSDS") for the chemicals. There was no ADC policy requiring the use of safety goggles for barracks porters at the time of this incident. Therefore, there was no violation of policy. MSDS does not require safety goggles, but states 'safety glasses are always recommended when handling chemical products.' There was no violation of any safety standard by not issuing any safety glasses. Furthermore, if Claimant had wanted safety glasses, he could have requested to be issued a pair and one would have been provided for him.
6. Claimant references the hazardousness of alky dimethylbenzyl ammonium chloride which is found in .09% strength in Razor Citrus Breeze. Obviously, Claimant is alleging this is the chemical which caused damage to his eye. This named chemical is the same product found in .08% strength in the household product, Lysol Brand Disinfectant All Purpose Cleaner, Lemon Scent. See Exhibit "A". Further research on this U. S. Department of Health & Human Services website for this chemical yielded no eye blindness 'health effects' from use of this product.
7. Claimant states in the complaint that 'he was making mop water & pouring chemicals into the mop bucket when some of them splashed up.' If Claimant was mixing chemicals this was in violation of the safety meeting which he had attended on February 13, 2012. See Exhibit "B". The safety meeting rules specifically state "Do not mix chemicals."
8. Claimant was taken to the infirmary where his right eye was flushed with water for 10 minutes. His vision was checked with no change noted at that time. It was noted that the right eye had no redness and no foreign body in it. He was given eye wash to continue to use. Claimant has returned to the infirmary on multiple occasions complaining of blurred

vision. On March 29, 2012, he was seen by Dr. Iko, Optometry provider for CMS, who, using a dilated exam, found his eyes to be within normal limits. He noted the vision and complaint are not consistent with ocular testing. Due to continued complaints by claimant, another appointment was made with Dr. Taylor for August 21, 2012. He was found to have an uncomfortable corneal keratitis that day and given eye drops for a month and an eye patch to wear.

9. An appointment with the Jones Eye Clinic was scheduled. After a thorough examination, Dr. Park's findings indicated: a normal eye exam except for mild inferior conjunctival injection (redness of the white of the eye), vision not commensurate with ocular findings, unable to find any abnormalities, and inconsistent findings with complete exam. He was given some drops for the redness in the eye. No follow up was ordered.
10. Prior to this examination, on at least one occasion, staff members have documented Claimant walking around the barracks without his eye patch until he approached officers, specifically on June 11, 2012.
11. Medical findings clearly indicate that Claimant is fabricating his loss of vision, decreased vision or blurred vision. None of the eye examination methods revealed any of these problems.
12. Based on the foregoing statements, Claimant has failed to state a claim upon which relief can be granted herein under ARCP Rule 12(b)(6).

WHEREFORE, for the reasons stated above, Respondent requests that the claim be dismissed.

Respectfully submitted,
Department of Correction Office of Counsel

Lisa Mills Wilkins
LISA MILLS WILKINS Ark. Bar #87190
Attorney Supervisor
Post Office Box 8707
Pine Bluff, AR 71611
(870)267-6844 Office
(870)267-6373 Facsimile

CERTIFICATE OF SERVICE

I certify that a copy of the MOTION TO DISMISS has been served this 28 day of January, 2014, on the Claimant by placing a copy of the same in the U. S. Mail, regular postage to:

DANIEL SANDERS (ADC#094279)
Varner Supermax
P. O. Box 500
Grady, AR 71644-0500

Lisa Mills Wilkins
LISA MILLS WILKINS Ark. Bar #87190

U.S. Department of Health & Human Services www.hhs.gov

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Products Names
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Chemical Information**Chemical Name:** Alkyl dimethyl benzyl ammonium chloride**CAS Registry Number:** 061789-71-7

Synonyms: Alkyl dimethyl benzyl ammonium chloride;
Dimethylcoco benzalkonium chloride; Benzylchloride quaternary
salt of N,N'-dimethylcocoamine; Coco alkyldimethylbenzyl
ammonium chlorides; N-Coco-N,N-
dimethylbenzenemethanaminium chloride; Quaternary ammonium
compounds, benzylcoco alkyldimethyl, chlorides

Information from other National Library of Medicine databases**Health Studies:** ***No information available in HSDB at this time*****Toxicity Information:** [Search TOXNET](#)**Chemical Information:** [Search ChemIDplus](#)**Products that contain this ingredient**

Brand	Category	Form	Percent
Clorox Floral Fresh Disinfecting Spray- 02/01/1999	Inside the Home	aerosol	
Lemon Fresh Pine-Sol All Purpose Cleaner-Old Product	Inside the Home	liquid	
Mistolin All Purpose Liquid Detergent, All Fragrances	Inside the Home	liquid	
Tilex Mildew Root Penetrator & Remover- 05/01/2007	Inside the Home	liquid	
Clorox Disinfecting Wipes, Fresh Scent- 06/01/2007	Inside the Home	wipes	0.145
Clorox Lemon Fresh Disinfecting Wipes- 06/01/2007	Inside the Home	wipes	0.145
Tilex Mildew Root Penetrator and Remover- 05/01/2007r	Inside the Home	pump spray	
Lysol Brand Disinfectant All Purpose Cleaner, Lemon Scent (Trigger Spray)-Old Product	Inside the Home	pump spray	0.08
Clorox Spring Mist Disinfecting Spray-Floral Fresh 18 Oz. (aerosol)	Inside the Home	aerosol	
Tilex Spray Soap Scum Remover-10/01/2002	Inside the Home	pump spray	
Aveeno Skin Clarifying Toner with Soy Extract, Alcohol-Free-Discontinued	Personal care	liquid	
Nair Hair Remover Kit, Cold Wax Strips Pretreatment Towelette-discontinued	Personal care	wax	
Lever 2000 Anti Bacterial Moisturizing Wipes	Personal care	sheets	0.15

Note: Brand names are trademarks of their respective holders.
Information is extracted from Consumer Product Information Database ©2001-2013 by DeLima Associates.
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National Institutes of Health, Health & Human Services
Customer Service: tehip@tehi.nlm.nih.gov
PDF documents can be viewed with the free [Adobe® Reader™](#)
Last updated: December, 2013



Exhibit

A

WEEKLY SAFETY MEETING
WEEK OF: February 13, 2012 TO February 17, 2012

Location: VARNER UNIT

Work Area: SANITATION (HOUSEKEEPING)-All Porters

Date of Attendance: 2/17/12 Start Time: 9:15 (A.M.) / P.M.) End Time: 1:15 (A.M.) / P.M.)
Date of Attendance: _____ Start Time: _____ (A.M. / P.M.) End Time: _____ (A.M. / P.M.)
Date of Attendance: _____ Start Time: _____ (A.M. / P.M.) End Time: _____ (A.M. / P.M.)
Sanitation Supervisor: CO-II J. Callaway J. Callaway
Alternative Supervisor: _____

SANITATION (Housekeeping):

YOU MUST CLEAN ALL AREAS DAILY. If your assigned area is not cleaned properly, you will be called back to work.

WORK AREA SAFETY:

1. Watch for wet surfaces. When you see any type of spill, clean it up right away; mark it with a sign, paper towel or wastebasket.
2. Keep work areas WELL-LIT, Always turn on the lights before entering a dark room. Make sure you can see where you are going, even if it means an extra trip.
3. HORSE PLAY WILL NOT BE TOLERATED.
4. REPORT ALL INJURIES TO YOUR SUPERVISOR.
5. During work time you are expected to be in your assigned area, when you are not in your assigned area you can not be accounted for. If you are instructed to clean an area by a staff member do so, regardless of your assignment.
6. Do not hang out at other work areas or chemical room unless instructed to be there. Being in an unassigned area without supervision will not be tolerated.

TOOLS:

All tools must be checked out and in daily. All tools must be returned to check out area before you leave the Area you are working in.

CHEMICALS:

- Do not mix chemicals. All chemicals are pre-mixed, you can add water while mopping. Use bleach for showers, toilets, urinals and sinks.
- Do not fill any bottle that is not properly labeled for that product.
- Never store chemicals for cleaning in a food container.
- It is the responsibility of all individuals (staff and inmates) to read and follow manufacture's instructions on all chemicals used.

PROPER LIFTING PROCEDURES:

- Take your time to examine the object that you will move.
- Arrange the object so that it will not slip, move, or change its balance when you lift it.



Exhibit

B

3. Stand close to the load that you have to carry. Center yourself and put your feet apart to the same width as your shoulders.
4. Keep your back as straight as possible. Bend your knees and squat down to reach for the load. Place your feet close to the object, the closer the better. Make sure that you have a good grasp at the load.
5. Keep the load close to your body, and get up while you still have a straight back. Keep your back vertical and straight and extend your hands toward the grips you will use to lift the object.
6. Begin applying force with your legs and arms. Do this slowly. If you give a sudden, hard pull or jerk you could injure your back.
7. Stand up, if the object is on the floor. Keep the object as close to your body as possible.
8. Bend through your knees with a straight back to place the load on a different spot.

MOVING CARTS THAT ARE FULL:

1. Push the load, rather than pull when you must move heavy objects.
2. If the cart is fully loaded, you will need to have one (1) person in front pulling and one (1) person behind the cart to push at the same time. Never attempt to move a cart that is too heavy for one (1) person to manage.

USING A LADDER SAFELY:

1. Choose the right ladder for the job.
2. Inspect the ladder before you use it.
3. Step up on the ladder with care.
4. Climb carefully. Always use a rail too help assist in keeping your balance. Do not jump from the ladder
Climb back down the ladder correctly.

BLOOD SPILL CLEAN-UP PROCEDURES

1. Restrict access to area, then put on personal protection equipment (two pairs of gloves: avoid tearing gloves, Leak-proof apron to protect your clothes)
2. Clean-up large amounts of blood with disposable towels in red bag (bio-hazardous bag).
Clean area from outward to inward, making contaminated area smaller without stepping into this area.
3. Do not pick up contaminated sharp objects with your hand; you must use mechanical means, such as a broom and dust pan to push the object into the dust pan.
4. After clean-up of visible blood, use a solution of 1 part of bleach to 9 parts of water to mop area, after this area is cleaned you must disinfect with germicidal product (Razor Citrus Breeze) allow for product to sit on area approximately 10 minutes or as directed by manufacture before mopping spill.
5. Apply disinfectant to bottom of shoes with disposable towels to ensure not to spread to other areas.
Before leaving the affected area place PPE (gloves) in a red bag of disposal.
6. Immediately dispose of red bag once cleanup is complete, place bag in Medical Services in a bio-hazardous container.
7. After cleaning, you must remove all personal protection equipment, promptly place all mop heads, aprons, etc. in a red bag then send to laundry for cleaning. All workers must wash their hands immediately after removal of personal protective equipment.

Your signature indicates that you understand all the safety rules. Please sign below.

INMATE NAME-PRINT-READABLE

ADC #

SIGNATURE-READABLE & BARRACKS #

14. *D. Sanders*

091219

David Sanders

- 15.
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- 40.

706

13 BKS
15 BKS
15 BKS
15 BKS

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION PL

DANIEL SANDERS CLAIMANT
(ADL #094279) NR. 14-11441-KK

VS.
ARKANSAS DEPARTMENT OF CORRECTION RESPONDENT

Response in Opposition to Respondent's
Motion to Dismiss and Petitioner Cross Motion

Now, now the Claimant, Arkansas Department of Correction, and for its Response in Opposition to Respondent's Motion to Dismiss and Petitioner Cross Motion, states and responds as follows with facts, in which relief can be granted, for Claimant.

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T. Claimant seeks \$25,000.00 for personal injury, pain and suffering, mental anguish as a result of an incident that occurred on February 16th 2013 at 7:55am as a serious result, of not following policy and procedure. Which also resulted in negligence by the Arkansas Department of Correction.

Fact: Incident occurred at 7:55am, 005 report done by Lt. Officer Shorter. Contacted Sgt. Madden over 19th and 22 barracks Zone 3. Taken to infirmary by Sgt. Madden, security in infirmary was C. H. S. Hudson, nurse who treated me was Mrs. Maloney at the time of treatment 8:01am with eye wash solution and appointment set for Otolaryngologist, Dr. Taylor in March 2013. Urine Drug Test issued by C. H. S. Williamson and 005 report.

Exhibits
Facts

Support of facts and findings through a unrelated issue but stating the Optometrist, Dr. Taylor true & correct findings of my right eye injury from the chemicals, done by Regional Medical Grievance Officer, Mrs. Charlotte D. Knaedner employed by C.M.S. / Horizon dated: 10/11/2012 See: document attachment IV p. 1 of 2 fact Exhibit XII. States: the truth, not conclusory as the Respondents alleges, in #1 of motion to dismiss.

Exhibits to
facts

II. The Claimant will continue to state in ordinary and concise language of facts showing that the claimant is entitled to relief as: under A.R.L.P. Rule 8(a)(1), along with exhibits to support facts against #2 question of Motion to Dismiss. See: Exhibit I thru 1 thru 1, which state a claim under A.R.L.P. Rule 8(a)(1) not A.R.L.P. Rule 12(b)(2).

Exhibits to
facts

III. Claimant was assigned as a bareback porter in 19 BKS by classification. And on February 15th 2012 while pouring chemicals into a mop bucket (not cleaning a chemical from his bucket) mis hearing on purpose by Respondent's alleged statement which do make it false. Sentences (Done, (3) three and the last part of (2) two is correct after the comma; splashed into his right eye. See: Again Exhibit IIa thru IIc, Exhibit IIIa thru IIIc, Exhibit VII, Exhibit the original claim itself filed by Claimant Daniel Sanders 094279 on Dec. 2nd 2013, to deny impacts, agree from 3rd Motion to Dismiss.

IV. Claimant did state which chemicals not chemical as Respondent refers to in question/statement #4, that was used and splashed in to his right eye. Which refer to Motion to Dismiss #4.

Exhibits
to Facts

Named in claimant's claim filed on Dec. 2nd 2013 seek named and provided photos of in Exhibits' Va thru Vd in support of claim so such relief can be granted.

V.

Claimant will provide facts, exhibits, to refute the statement/allegation made by ~~Respondent~~ Respondent in #5 of Motion to Dismiss,

Exhibits
to Facts

See: Exhibit VIIa & VIIb, Exhibit IXa thru IXb AL Safety & Sanitation, effective date: 3/10/94 (AL 401), Exhibit IXa thru Xh, Administrative Directive 10-40 Hazardous Chemicals Program. Effective date: 12/24/2010 (quote) Exhibit Xg Section 2(a) of this fact totally ignored. Both AL 3A Discipline & procedures in effect before incident see effective date on both.

(b)

Still 106 MSDS provided by Respondent's as requested by Claimant Exhibits' IVa thru IVc and referred to in Exhibit Xd where in AD-10-40 Hazardous Chemicals Program p. 4 of 8 Section D #6) MSDS (material safety data sheets shall be made available upon request.) Respondent's denied this very important fact which they have and also my letters to the company for them. Respondent's are guilty of withholding evidence ~~not~~ relevant to Claimant's claim which also prove facts which relief can be granted.

(c)

Both AL 3A D clearly states that the (A.D.L.) Arkansas Department of Correction is responsible for the planning, implementing and supervising specific safety and sanitation policies and ~~and~~ procedures. Exhibit IXa Section VIa.

(d) Also Exhibit XF Section A p. 8 of 8 & 7 of 8 & Section J(2) & Xb p. 8 of 8, protective equipment to be issued. And furthermore Claimant requested safety glasses several times see Exhibits Ta thru Tc, told I had to wait wasn't important enough to have them, requested through the grievance # VII-12-00433 dated 1/28/12 & also grievance # VII-12-00335 dated 2/7/12 Exhibit XIII a thru d. Both grievance are before injury still denied fact, which shows Claimant has proved variation of facts where Respondent's failed to issue Claimant safety glasses before injury and keep him safe from harm and injury per policy & procedure also see Exhibits XTa thru XTd focusing on XTa & XTc respectively, which are the duties of Arkansas Department of Correction employees # Correctional Warden & Deputy Warden, which show facts upon which relief can be granted for relief to Claimant to Motion to Dismiss by Respondent's # 5 question/statement.

VI.

Claimant's references to the hazardous chemical ingredient dimethylbenzylammonium chloride is found in both Razor Citrus breeze & Razor Green which is labeled Hazardous Chemicals on the MSDS (material safety data sheet) ranking them 2 & 1 respectively, which has nothing to do with ~~the~~ Respondent's Exhibit A because they are not household chemicals, which Respondent presented a household products database sheet, why not provided data or MSDS sheet on Claimant's Exhibits Va thru Vd, which involves the chemicals which was the cause of Claimant's.

injuries to state facts upon which relief can be granted.

Fact: (A) Respondent's Exhibit (A) concerning Claimant's references to Razor Citrus Breeze, Razor Green, Razor Blue, & Razor Sparkle Plus has nothing to do with each other their for don't cause any conclusions that must be decided by the Arkansas State Claims Commission against my fact of the chemicals which caused injuries to my right eye.

(B) Once requested or documents (MSDS) subpoenaed by the Arkansas State Claims Commission Director or member, this with Claimant's other facts will prove further Claimant is entitled to relief upon which can be granted per A.R.P. Rule 8.6(a)(2).

(C) Also Claimant request that the Arkansas State Claims Commission request that Respondent's produce all MSDS data to named chemicals in Claimant's claim issued by the company that make them including Hazardous ranking, safety precaution etc. to further support facts, & exhibits presented by Claimant in Cross to Respondent's # 6 question/statement to Motion to Dismiss.

7 Respondent deliberately tried to Mislead Claimant and Arkansas State Claims Commission with Exhibit B in stating that (quote): "If Claimant was mixing chemicals this was in violation of the safety meeting which he attended on February 13, 2012."

facts & exhibits (A) First off: Respondent's Exhibit b clearly states: Week of February 13 2012 to February 17, 2012 At the top.

(b) Then Date of Attendance is 2/17/12, start time: 9:15 am
End Time: 1:15 pm

Sir, this safety meeting was (2) two days after my injury on a Friday on 2/17/12 not 2/13/2012 as Respondent would have you to believe their for misleading the Arkansas State Claims Commission and trying to mislead Claimant. After receiving Respondent's Motion to Dismiss, Claimant tried to utilize the Legal Assistance form to order several key pieces of evidences that was very crucial to Claimant's response to Respondent's Motion to Dismiss, but was denied see exhibit IX date 1/31/14 denied on 2/1/14 by respondent's workers.

(c) Claimant's Exhibit (A) is a Calendar Date made to present to the Arkansas State Claims Commission the year 2012, month February to show the date of injury, date of safety meeting on 2/17/12 after claimant was hurt, injured and had to sign for safety glasses which shows my signature for them See Respondent's Exhibit (b) re submitted as evidences to support Claimant Exhibit of not being issued safety glasses until that Friday 2 days after 2/15/12 on 2/17/12. And therefor I never violated any safety meeting rules and as further proof to state facts upon which relief can be granted that over at ~~the~~ Lense 39 other inmates was without safety glasses and was not issued until after my injuries to my right eye and was made to still work.

Arkansas
State Claims Commission
MAR 04 2014
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(d) This show that Claimant's Claim is entitled to relief as under Ark. P Rule 8(a)(1) and not for dismissal as Respondent's Motion to Dismiss per question/statement # 7. And as my Exhibits Ia thru Ic & Exhibits XIIIa thru d. Support no safety glasses issued nor signed for until 2/17/12 See: Exhibit IIb & incident was 2/15/12 Wednesday. Evidence shown to Arkansas State Claims Commission upon which relief can be granted to Claimant.

8. Respondent once again tried to mislead and misdirect by taking sentences & statements which are part true on what took place and some are reworded to form another meaning: which I will break down and show which Exhibit had which sentence in it in order 1 thru 6 sentences in Respondent's #8 question/statement from Motion to Dismiss in order.

- Facts (A) - Taken from Exhibit IIb of Claimant, 1 sentence reworded
- Exhibits 2 - Taken from Exhibit IIb of Claimant, 2 sentence reworded
- ~~3 - Taken from Exhibit IIb of Claimant, 3 sentence reworded.~~
- 3 - Taken from Exhibit not presented by Claimant or Respondent but from Claimant medical records 3 sentence.
- 4 - Taken from Exhibit IIb of Claimant, 4 sentence reworded.
- 5 - Taken from Claimant medical records not presented by Claimant or Respondent Exhibits 5 sentence.
- 6 - Taken from Claimant medical records not presented by Claimant or Respondent Exhibit 6 sentence.

-7- Taken from Claimant medical records not presented by Claimant or Respondent Exhibits 7[#] sentence.

8- Taken from Claimant medical records not presented by Claimant in original Exhibits but is referred to in added Exhibit XII by Claimant in this Response in opposition to Respondent's Motion to Dismiss and Petitioner Cross Motion. See Exhibit XII.

~~First sentence in bracket referring to Aug. 21, 2012 which supported injury to right eye by chemicals splash from 2/15/12. 8[#] sentence~~

9- Taken from Claimant Medical records not presented by Claimant in original Exhibits but is presented by Claimant's Exhibit XII for Response in Opposition to Respondent's Motion to Dismiss and Petitioner Cross Motion. Reworded but is true (fact) in support of Claimant Claims of injuries to right eye their for presents another statement in ordinary and concise language of facts showing that the Claimant is entitled to relief under A.R.L.P. Rule 8(a)(1), not Rule 12(b)(6). 9[#] sentence.

Now sentences 3, 5, 6, 7, were thrown in here to confuse and mislead the Arkansas State Claims Commission with conclusory statements that has no fact finding right now for the Arkansas State Claims Commission to review in making a sound decision on question/statement #8. But sentences 1, 2, 4, 8 & 9 has facts & Exhibits the Arkansas State Claims Commission can review in determining the facts in this

question/statement 8. and see the facts I've provided to support relief granted to Claimant.

9.

Claimant breaks down Dr. Park's findings which indicated: A normal eye exam except for mild inferior conjunctival injection (mild inferior means poor inequality) & conjunctiva injection (redness of the white of the eye), vision not commensurate (means - not equal in measure or size) with ocular findings, (means - or like the eye), unable to find any abnormalities (means - malformation), and inconsistent findings with complete exam. (means - not in agreement findings with complete exam).

Facts (a) definition

Bottom Line # Dr. Park's findings indicated: poor inequality, redness of the white of the eye, not equal in measure or size, or like the eye, unable to find any malformation, and not in agreement findings with complete exam.

(b)

So Dr. Park's had serious doubts, but only ordered drops for redness in the eye, from Respondent's continuously trying to mislead Claimant & Arkansas State Claims Commission, so is this all of the report from this one Jones Eye Clinic visit which I went on 2 visits. Again in 2013 in July on the 11th. If no follow up was ordered, again misleading & half truths by Respondent. 9th statement/question answered.

10. facts:

Request that Respondent prove or produce this staff member's documentation of the original documents from this day which Respondent clearly states:

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June 11th 2012. Along with sign in log and true & brief description explaining where Claimant was & what area, instead of this merely made conclusory statement/question presented by Respondent. 10th state ment/question.

11. Claimant refers back to All facts & Exhibits presented after 2/15/12 injury to right eye especially Exhibit quoting Dr. Taylor first examination from March 2012 right after the incident. A ~~licensed~~ Licensed Optometrist employed by CMS/ Horizon for (ADL) revealed all of these problems & more. Done by Mrs. Charlotte D. Knaedner, Regional Medical Services Officer on 10/11/12 See Exhibit XII provided by Claimant in which are facts showing where relief can be granted to Claimant's claim. Also Exhibit IIb, IIc, IIIb, IIIc, VI, acknowledge that Claimant did in fact was in a incident from chemicals splashing into his eye causing injuries (rights), 11th state ment/question answered.

Facts & Exhibits

Facts & Exhibits

12. Based on all the evidences and Exhibits provided by Claimant in this motion/Response in Opposition to Respondent's Motion to Dismiss and Petitioner Cross Motion) to support Claimant's original claim filed & with exhibits & facts presented. ~~Claimant~~ Claimant has in fact presented a motion/petition that truly nudges across the line from possible to plausible therefor clearly meeting the standard, a claim set forth which relief can be granted according to A.R.L.P. Rule 8(a)(1). And truly state facts upon which relief can be granted

PXI

by the Arkansas State Claims Commission,
Bell Atlantic Corp. vs. Twombly 550 U.S. 544 (2007).

Wherefore, for the reasons stated above, Claimant
requests that the claim not be dismissed but set
for hearing and relief granted to Claimant.

Respectfully Submitted
Claimant Pro Se
Daniel Sanders # 094279
Daniel Sanders # 094279
Pro Se
VSM Unit
P.O. Box 200
Grady Ar. 71644-0200

Certificate of Service

I certify that a copy of the foregoing Motion will be
served upon Respondent once filed marked by Claims
Commission and forward to them, by placing a filed marked
in U.S. mail.

Lisa Mills Wilkins Ark. Bar # 87190
Attorney Supervisor for (Pl. Off.) Respondent
P.O. Box 8707
Pine Bluff, Ar. 71611

IGTT420
3GH

Attachment IV

INMATE NAME: Sanders, Daniel ADC #: 094279D GRIEVANCE #: VSM

HEALTH SERVICES RESPONSE TO UNIT LEVEL GRIEVANCE

At the informal level, I apologized for the error and advised that a Medication Error Report had been completed, your eye had been irrigated, you had been examined by Dr. Iko and you had a pending optometry referral which was scheduled for the next week.

Records reflect you were seen by the Optometrist, Dr. Taylor, at Eye Clinic on August 21, 2012, as a follow-up from your March 2012 visit regarding your right eye. (He noted that your previous exam (March 2012) revealed irritation, light sensitivity and no vision in your right eye other than hand motion. He made an assessment of "right eye does have an uncomfortable corneal keratitis today" for which he recommended Cortisporin eye drops one drop to right eye four times daily for one month, continuation of your eye patch and a one month follow-up. Dr. Iko reviewed and implemented the recommendations that same day.) You were seen August 22 at 5:53 pm as a walk-in, complaining of loss of vision and burning of right eye since you got some chemicals in it. The nurse irrigated your right eye "several times" with Eye wash. You returned the following evening complaining of increased right eye discomfort (pain, throbbing, pressure and drainage). The nurse noted that your eye appeared "blot shot

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As I stated at the informal level, I regret the error and due to the error your grievance had merit. However, your allegation that Nurse Burnett intentionally made the error is without merit.

Clauder Regional Medical Sv. Office 10/11/12

"Sanction Employee"

Exhibit VIII

UNIT LEVEL GRIEVANCE FORM (Attachment I)

Unit/Center Vander
Name D. Sanders
ADC# # 094219 Brks # 19 Job Assignment Bks. Porter

FOR OFFICE USE ONLY
GRV. # VU12-335
Date Received 2-14-12
GRV. Code #: 508

2/7/12 (Date) STEP ONE: Informal Resolution

2/10/12 (Date) STEP TWO: Formal Grievance (All complaints/concerns should first be handled informally.)
If the issue was not resolved during Step One, state why: didn't answer the grievance
is not hand the inmate is on 30 days and not let he would not enter to the other Porter

(Date) EMERGENCY GRIEVANCE (An emergency situation is one in which you may be subject to a substantial risk of physical harm; emergency grievances are not for ordinary problems that are not of a serious nature). If you marked yes, give this completed form to the designated problem-solving staff, who will sign the attached emergency receipt. If an Emergency, state why:

Is this Grievance concerning Medical or Mental Health Services? If yes, circle one: medical or mental

BRIEFLY state your one complaint/concern and be specific as to the complaint, date, place, name of personnel involved and how you were affected. (Please Print):
Today on 2/7/12 Co. Calloway for
sanction against 19 BKS. at approx 2:25 am. I went straight to inmate J. Smith #16493 and
awaken him to resolve him of issues that was or about to take place within the barracks. This
were said only to him which is only one barracks porter that has a 30 day no duty no work max.
307. So he want do something period. Co. Calloway didn't resolve any other concerns. 2 porters
of what was taking place and he stated that barracks porter in here says everything grievances not
we still don't have safety shown caution net signs or on proper safety meetings. Their are only
short cuts to do their job. This type of problem has to stop and the actions of Co. Calloway
is unprofessional and un called for.
And should be noted that this officer doesn't seek approval or retaliation for my use of the
grievance procedure and stop being discriminatory toward black inmates.

Daniel Sanders # 094219
Inmate Signature

2/7/12
Date

If you are harmed/threatened because of your use of the grievance process, report it immediately to the Warden or designee.

THIS SECTION TO BE FILLED OUT BY STAFF ONLY

This form was received on 2/7/2012 (date), and determined to be Step One and/or an Emergency Grievance
(Yes or No). This form was forwarded to medical or mental health? (Yes or No). If yes, name
of the person in that department receiving this form: Date

Sgt. J. Madden 45739 Sgt. J. Madden 2/7/2012
PRINT STAFF NAME (PROBLEM SOLVER) ID Number Staff Signature Date Received

Describe action taken to resolve complaint, including dates:

Staff Signature & Date Returned

Daniel Sanders 2/10/12
Inmate Signature & Date Received

This form was received on (date), pursuant to Step Two. Is it an Emergency? (Yes or No).

Staff Who Received Step Two Grievance: Date:

Action Taken: (Forwarded to Grievance Officer/Warden/Other) Date:

If forwarded, provide name of person receiving this form: Date:

MX4
Exhibit XIIIb

Attachment III

IGTT410
3GS

INMATE NAME: Sanders, Daniel ADC #: 094279D GRIEVANCE #: VU-12-00335

WARDEN/CENTER SUPERVISOR'S DECISION

In response to your grievance, COII Callaway advised he entered 1-22 barracks assigning one (1) barracks porter to cleaning all window seal. COII Callaway stated he did not need to speak to you and has advised you several times that you will receive safety glasses and gloves as so as they come in. COII Callaway also stated as for the discrimination comment he has only one (1) white inmate working for him. Therefore, I find no merit in your complaint.



Signature of Warden/Supervisor or
Designee

Warden

Title

3/5/12

Date

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MAR 20 2012

INMATE'S APPEAL

INMATE GRIEVANCE SUPERVISOR
ADMINISTRATION BUILDING

If you are not satisfied with this response, you may appeal this decision within five working days by filling in the information requested below and mailing it to the appropriate Chief Deputy/Deputy/Assistant Director along with the Unit Level Grievance Form. Keep in mind that you are appealing the decision to the original grievance. Do not list additional issues, which are not part of your original grievance as they will not be addressed. Your appeal statement is limited to what you write in the space provided below.

WHY DO YOU DISAGREE WITH THE ABOVE RESPONSE? Issues concerning the Barracks Porters
is over. But due to not having any safety glasses, I was seriously injured by getting chemicals in my eyes. My
right eye. I can't see out of it at all. All the time Sanitation Supervisor Mr. Col. Callaway had extra glasses
(safety) & gloves because ~~at~~ after 10 days later, we received safety glasses & gloves which were in
storage for his squad & other jobs more important than barracks in 19 thru 22 area. So now not having
any safety glasses then when everyone else besides barracks 19 thru 22 had them is still a very
serious issue. ~~The~~ Incident occurred on 2-15-12 and it's been over 28 days without seeing a eye doctor
This all is related to not having any safety glasses & gloves and Warden Banks were aware
that we didn't have any. Please look into this issue pertaining to this grievance.
Thank you. All the discrimination issues have been resolved as of now.

Daniel Sanders

Inmate Signature

094279

ADC#

Ex-XIIIe

3/13/12

Date

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MAR 20 2012

INMATE GRIEVANCE SUPERVISOR
ADMINISTRATION BUILDING

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Ex. XIII

IGTT430
3GD

Attachment VI

INMATE NAME: Sanders, Daniel

ADC #: 094279

GRIEVANCE#: VU-12-00335

CHIEF DEPUTY/DEPUTY/ASSISTANT DIRECTOR'S DECISION

Your complaint is that COI Calloway is discriminating toward black inmates by not letting the black barracks porters know what the white barracks porters know.

COI Calloway states, "I COII Callaway entered 19 barracks that day to pick only one barracks porter to be assigned to cleaning windows. I did not need to speak to Inmate Sanders or any of the other barracks porters that day. Inmate Hutts was the one I spoke to. As for the safety glasses coment, I told Inmate Sanders as soon as I get glasses and gloves in that they would be issued. As of today that has been resolved. Also, I COII Callaway have no problem with black people."

Inmate Sanders, based upon the above statement, I find no merit to your complaint and no further action is warranted at this time.

Appeal denied

17m7

Director

Date

5.1.12

Exhibit IVX

VARNER SUPERMAX UNIT (SEGREGATION)
LEGAL ASSISTANCE, SUPPLY/MATERIALS, TYPING & COPY FORM

Inmate Name (Print): Sanders, Daniel ADC#: 994079 Cell/Iso: C85-510 Date: 1/31/14
Inmates on Punitive Restriction may order legal materials unless on Behavior Control or Treatment Precaution.

SUPPLY REQUEST APPROVED [] DENIED []

Inmates may obtain lined paper, envelopes, and postage through the Commissary indigent program and non-indigent inmates may purchase these items. Unless the indigent inmate can present "OPEN CASE DOCUMENTS" that consist of deadline or be within statutory post conviction deadlines.

Typing Paper-----Limit per issue-(10 Sheets) (20) possession limit
Envelopes #10-----Limit per issue-(5) (10) possession limit
Manila (Large) Envelope--Limit per issue-(2) (04) possession limit

You must attach a properly signed Inmate Withdrawal Request to this request.

TYPING REQUEST APPROVED [] DENIED []

Specific orders from the court stating the document must be typed must be forwarded to the Law Library Supervisor for review along with a typing request. Legal work must be neatly and legibly written, will be typed as is; only one editing changes/ corrections will be made except for typographical errors as approval by the Law Library Supervisor. Preprinted forms will not be retyped. Attach the requested typing to this form; typing will be completed within a reasonable time giving priority to deadlines. Allow sufficient time for typing and editing prior to the deadline.

REQUEST FOR COPIES APPROVED [] DENIED []

I request copies to be made for a legal purpose. Description of paperwork Number of copies: Initial

You must attach a properly signed Inmate Withdrawal Request for copying. (Each side of a page is considered a copy and is subject to a calculated fee \$.05 per copy)

Documents not of a legal nature may be requested for a compelling reason by writing a request to the Law Library Supervisor explaining why you need copies. Copier service will be authorized once (1) per month, unless the inmate can present "OPEN CASE DOCUMENTS" that consist of deadline or be within statutory post conviction deadlines.

LEGAL MATERIAL REQUEST (Case, Statutes, AR's / AD's, Law Book, etc)

Book # ARCP Rule 1 thru 123 Act 422 of 1949, ADA, 19-10-201
Safety classes policy issued in 2011 or first 2012 maybe before that
Copy of 2012 calendar for court, civil, small claims
Copy of the rules Sanitation (Hall Porters) workers - one type of form
Copy of the rules for (Barrack Porters) workers - one type of form
Contact Lt. J. L. Allaway, Sanitation Supervisor for both types of forms
He has these on file and in his office "Public Records"

Only two (2) books or six (6) cases may be checked out at a time. All items must be returned to receive other legal materials. Unless the inmate can present "OPEN CASE DOCUMENTS" that consist of deadline or be within statutory post conviction deadlines. An Index of Law Library materials is available upon request to the Law library Supervisor.

LEGAL ASSISTANCE:

When an inmate is unable to make meaningful use of the Law Library on his own he can request assistance in preparing and filing legal papers from the ADC Attorney for Inmates.

Inmate Signature: Daniel Sanders

Date Requested: 1/31/14

Program Specialist Signature:

Date Received:

Library Supervisor Signature:

Date Received:

Law Clerk Signature: 2-1-14 (PW)

Date Filled: 2-1-14

Program Specialist Signature:

Date Issued:

Inmate Signature: Daniel Sanders

Date Received: 2/4/14

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COMPLETE AND RETURN TO LAW LIBRARY SUPERVISOR.

Allow seven days to complete available requests.

25

To Show the Weekly Safety Meetings

Week of February 13, 2012 to February 17, 2012.

Monday thru Friday. Incident occurred on 2-15-2012
On ~~Wednesday~~ Safety Meeting on Friday. See Respondent's
Exhibit B as their own Evidence against them. See Date of Attend-
ance is 2/15/12 which is Friday at 9:15am to 1:15pm. This is the day
we signed for Safety Glasses. 2 days after my eye incident.
The Respondent is trying to Mislead the Claims Commission
by providing the one sign-in Log after my eye injury See:

"CALENDAR DATE"

2012							2013																				
S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S
JANUARY							JULY							JANUARY							JULY						
1	2	3	4	5	6	7	1	2	3	4	5	6	7	1	2	3	4	5	6	7	1	2	3	4	5	6	7
8	9	10	11	12	13	14	8	9	10	11	12	13	14	8	9	10	11	12	13	14	8	9	10	11	12	13	14
15	16	17	18	19	20	21	15	16	17	18	19	20	21	15	16	17	18	19	20	21	15	16	17	18	19	20	21
22	23	24	25	26	27	28	22	23	24	25	26	27	28	22	23	24	25	26	27	28	22	23	24	25	26	27	28
29	30	31					29	30	31					27	28	29	30	31			27	28	29	30	31		
FEBRUARY							AUGUST							FEBRUARY							AUGUST						
			1	2	3	4	5	6	7	8	9	10	11	3	4	5	6	7	8	9	4	5	6	7	8	9	10
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MARCH							SEPTEMBER							MARCH							SEPTEMBER						
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4	5	6	7	8	9	10	9	10	11	12	13	14	15	10	11	12	13	14	15	16	8	9	10	11	12	13	14
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18	19	20	21	22	23	24	23	24	25	26	27	28	29	24	25	26	27	28	29	30	22	23	24	25	26	27	28
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APRIL							OCTOBER							APRIL							OCTOBER						
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8	9	10	11	12	13	14	7	8	9	10	11	12	13	7	8	9	10	11	12	13	6	7	8	9	10	11	12
15	16	17	18	19	20	21	14	15	16	17	18	19	20	14	15	16	17	18	19	20	13	14	15	16	17	18	19
22	23	24	25	26	27	28	21	22	23	24	25	26	27	21	22	23	24	25	26	27	20	21	22	23	24	25	26
29	30						28	29	30	31				28	29	30				27	28	29	30	31			
MAY							NOVEMBER							MAY							NOVEMBER						
			1	2	3	4	5	1	2	3							1	2	3	4	1	2	3	4	5	6	7
6	7	8	9	10	11	12	4	5	6	7	8	9	10	5	6	7	8	9	10	11	3	4	5	6	7	8	9
13	14	15	16	17	18	19	11	12	13	14	15	16	17	12	13	14	15	16	17	18	10	11	12	13	14	15	16
20	21	22	23	24	25	26	18	19	20	21	22	23	24	19	20	21	22	23	24	25	17	18	19	20	21	22	23
27	28	29	30	31			25	26	27	28	29	30		26	27	28	29	30	31		24	25	26	27	28	29	30
JUNE							DECEMBER							JUNE							DECEMBER						
					1	2	2	3	4	5	6	7	8	2	3	4	5	6	7	8	1	2	3	4	5	6	7
3	4	5	6	7	8	9	9	10	11	12	13	14	15	9	10	11	12	13	14	15	8	9	10	11	12	13	14
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17	18	19	20	21	22	23	23	24	25	26	27	28	29	23	24	25	26	27	28	29	22	23	24	25	26	27	28
24	25	26	27	28	29	30	30	31						30							29	30	31				

SEE Circled Month, 2012

WEEKLY SAFETY MEETING
WEEK OF: February 13, 2012 TO February 17, 2012

Location: VARNER UNIT Work Area: SANITATION (HOUSEKEEPING)-All Porters
Date of Attendance: 2/17/12 Start Time: 9:15 (A.M.) / P.M.) End Time: 1:15 (A.M.) (P.M.)
Date of Attendance: _____ Start Time: _____ (A.M. / P.M.) End Time: _____ (A.M. / P.M.)
Date of Attendance: _____ Start Time: _____ (A.M. / P.M.) End Time: _____ (A.M. / P.M.)
Sanitation Supervisor: CO-II J. Callaway J. Callaway
Alternative Supervisor: _____

SANITATION (Housekeeping):

YOU MUST CLEAN ALL AREAS DAILY. If your assigned area is not cleaned properly, you will be called back to work.

WORK AREA SAFETY:

1. Watch for wet surfaces. When you see any type of spill, clean it up right away; mark it with a sign, paper towel or wastebasket.
2. Keep work areas WELL-LIT, Always turn on the lights before entering a dark room. Make sure you can see where you are going, even if it means an extra trip.
3. HORSE PLAY WILL NOT BE TOLERATED.
4. REPORT ALL INJURIES TO YOUR SUPERVISOR.
5. During work time you are expected to be in your assigned area, when you are not in your assigned area you can not be accounted for. If you are instructed to clean an area by a staff member do so, regardless of your assignment.
6. Do not hang out at other work areas or chemical room unless instructed to be there. Being in an unassigned area without supervision will not be tolerated.

TOOLS:

All tools must be checked out and in daily. All tools must be returned to check out area before you leave the Area you are working in.

HEMICALS:

- Do not mix chemicals. All chemicals are pre-mixed, you can add water while mopping. Use bleach for showers, toilets, urinals and sinks.
- Do not fill any bottle that is not properly labeled for that product.
- Never store chemicals for cleaning in a food container.
- It is the responsibility of all individuals (staff and inmates) to read and follow manufacture's instructions on all chemicals used.

PROPER LIFTING PROCEDURES:

- Take your time to examine the object that you will move.
- Arrange the object so that it will not slip, move, or change its balance when you lift it.



Exhibit

B

3. Stand close to the load that you have to carry. Center yourself and put your feet apart to the same width as your shoulders.
4. Keep your back as straight as possible. Bend your knees and squat down to reach for the load. Place your feet close to the object, the closer the better. Make sure that you have a good grasp at the load.
5. Keep the load close to your body, and get up while you still have a straight back. Keep your back vertical and straight and extend your hands toward the grips you will use to lift the object.
6. Begin applying force with your legs and arms. Do this slowly. If you give a sudden, hard pull or jerk you could injure your back.
7. Stand up, if the object is on the floor. Keep the object as close to your body as possible.
8. Bend through your knees with a straight back to place the load on a different spot.

MOVING CARTS THAT ARE FULL:

1. Push the load, rather than pull when you must move heavy objects.
2. If the cart is fully loaded, you will need to have one (1) person in front pulling and one (1) person behind the cart to push at the same time. Never attempt to move a cart that is too heavy for one (1) person to manage.

USING A LADDER SAFELY:

1. Choose the right ladder for the job.
2. Inspect the ladder before you use it.
3. Step up on the ladder with care.
4. Climb carefully. Always use a rail too help assist in keeping your balance. Do not jump from the ladder
Climb back down the ladder correctly.

BLOOD SPILL CLEAN-UP PROCEDURES

1. Restrict access to area, then put on personal protection equipment (two pairs of gloves: avoid tearing gloves, Leak-proof apron to protect your clothes)
2. Clean-up large amounts of blood with disposable towels in red bag (bio-hazardous bag).
Clean area from outward to inward, making contaminated area smaller without stepping into this area.
3. Do not pick up contaminated sharp objects with your hand; you must use mechanical means, such as a broom and dust pan to push the object into the dust pan.
4. After clean-up of visible blood, use a solution of 1 part of bleach to 9 parts of water to mop area, after this area is cleaned you must disinfect with germicidal product (Razor Citrus Breeze) allow for product to sit on area approximately 10 minutes or as directed by manufacture before mopping spill.
5. Apply disinfectant to bottom of shoes with disposable towels to ensure not to spread to other areas.
Before leaving the affected area place PPE (gloves) in a red bag of disposal.
6. Immediately dispose of red bag once cleanup is complete, place bag in Medical Services in a bio-hazardous container.
7. After cleaning, you must remove all personal protection equipment, promptly place all mop heads, aprons, etc. in a red bag then send to laundry for cleaning. All workers must wash their hands immediately after removal of personal protective equipment.

Your signature indicates that you understand all the safety rules. Please sign below.

INMATE NAME-PRINT-READABLE

ADC #

SIGNATURE-READABLE & BARRACKS #

14. O. Sanders

091289

Daniel Sanders

- 15.
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- 40.

Arkansas
 State Claims Commission
 MAR 04 2014
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13 BKs
 15 BKs
 15 BKs
 15 BKs

STATE CLAIMS COMMISSION DOCKET
OPINION

Amount of Claim \$ 25,000.00

Claim No. 14-0441-CC

Daniel Sanders, #094279 Claimant
vs.

Attorneys
Pro se Claimant

Department of Correction Respondent
State of Arkansas

Lisa Wilkins, Attorney Respondent

Date Filed December 2, 2013

Type of Claim Personal Injury, Pain & Suffering
Mental Anguish, Negligence and Failure
to Follow Procedure

FINDING OF FACTS

The Claims Commission hereby unanimously grants the Respondent's "Motion to Dismiss," for Claimant's failure to file a timely response. Therefore, this claim is hereby unanimously denied and dismissed.

IT IS SO ORDERED.

(See Back of Opinion Form)

CONCLUSION

The Claims Commission hereby unanimously grants the Respondent's "Motion to Dismiss," for Claimant's failure to file a timely response. Therefore, this claim is hereby unanimously denied and dismissed.

Date of Hearing March 6, 2014

Date of Disposition March 6, 2014

[Signature] Chairman
[Signature] Commissioner
[Signature] Commissioner

**Appeal of any final Claims Commission decision is only to the Arkansas General Assembly as provided by Act #33 of 1997 and as found in Arkansas Code Annotated §19-10-211.

Before The Arkansas State Claims Commission

P.T.

DANIEL SANDERS - CLAIMANT
(AR# 094279)

vs. 14-0441-L

ARKANSAS DEPARTMENT OF CORRECTION-RESPONDENT

A Motion for Reconsideration of a Claims Commission decision back to the Commission on

Claim # 14-0441-L, denied and dismissed.

I. The Claims Commission held a hearing on March 6th 2014 unanimously granting the Respondent's "Motion to Dismiss" because Claimant's failure to file timely response. Therefore this claim is hereby unanimously denied and dismissed.

Arkansas
State Claims Commission
APR 03 2014

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II. According to Rule 7.1 of Arkansas State Claims Commission handbook, the Claimant have to provide new & additional evidence which was not available to the moving party at the time of the scheduled hearing.

"Matter of Facts & Evidence & Exhibits to Support"

III. I do have new & additional evidences & exhibits that was not available to me, due to direct interference from Ms. Lize Mills Wilkins Attorney Supervisor of Respondent's/Client's directing to Vaerner Unit Law Library Supervisor Ms. G. Evans to not assist me nor any other inmates with legal assistance on obtaining any AR, AD, copies of Exhibits, Law Library for the time

Exhibit
A

VARNER SUPERMAX UNIT
APPROVAL / DENIAL FOR LEGAL
COPYING / TYPING

NAME: SANDERS, D. ADC#: 94279

LOCATION: 5-10

Your request for copying was received on the 7TH day of MARCH, 2014.

Your request for copying was approved on the _____ day of _____, 2014.

Your request for copying is being denied on the 7TH day of MARCH, 2014 because:

Your request for typing was received on the _____ day of _____, 2013.

Your request for typing was completed on the _____ day of _____, 2013.

Your request for typing is being denied on the _____ day of _____, 2013 because:

IN ACCORDANCE WITH VARNER UNIT POLICY 14.7, U. S. SUPREME COURT DOCUMENTS ARE THE ONLY DOCUMENTS THAT MUST BE TYPED. ALL OTHER DOCUMENTS CAN BE HANDWRITTEN.

MS. G. EVANS, LAW LIBRARY SUPERVISOR

G. Evans

DATE: 3-7-14

COMMENTS: REQUEST FOR COPIES DENIED FOR 6 COPIES OF EXHIBITS: AD'S AND AR'S ARE NOT TO BE COPIED PER COMPLIANCE DIVISION

*****All Legal Documents approved for copying are returned to the Varner Supermax Unit Treatment Staff for copying and distribution to Inmates in Varner Supermax.*****

I'm filing a complaint and need copies and the Compliance Division Don't Assst. Inmates See her letter dated Feb. 6, 2014 So, I need copies of this for CLAIMS.

Exhibit
"B thru K"

ARNOLD
VARNER SUPERMAX UNIT (SEGREGATION)
LEGAL ASSISTANCE, SUPPLY/MATERIALS, TYPING & COPY FORM

Inmate Name (Print): Sanders, Daniel ADC#: 091279 Cell/Isolation: CRS-510 Date: 1/31/14
Inmates on Minimum Restriction may order legal materials unless on Behavior Control or Treatment Precaution.

SUPPLY REQUEST APPROVED DENIED

Inmates may obtain lined paper, envelopes, and postage through the Commissary indigent program and non-indigent inmates may purchase these items. Unless the indigent inmate can present "OPEN CASE DOCUMENTS" that consist of deadline or be within statutory post conviction deadlines.

Typing Paper - Limit per issue: 10 Sheets (20) possession limit
Envelopes #10 - Limit per issue: 5 (10) possession limit
Manila (Large) Envelope - Limit per issue: 2 (04) possession limit

You must attach a properly signed Inmate Withdrawal Request to this request.

TYPING REQUEST APPROVED DENIED

Specific orders from the court stating the document must be typed must be forwarded to the Law Library Supervisor for review along with typing request. Legal work must be neatly and legibly written, will be typed as is; only one editing changes/corrections will be made except for typographical errors as approval by the Law Library Supervisor. Preprinted forms will not be retyped. Attach the requested typing to this form; typing will be completed within a reasonable time giving priority to deadlines. Allow sufficient time for typing and editing prior to the deadline.

REQUEST FOR COPIES APPROVED DENIED

request copies to be made for a legal purpose. Description of paperwork: _____ Number of copies: _____ Initial: _____

You must attach a properly signed Inmate Withdrawal Request for copying. (Each side of a page is considered a copy and is subject to a calculated fee \$.05 per copy)
Documents not of a legal nature may be requested for a compelling reason by writing a request to the Law Library Supervisor explaining why you need copies. Copier service will be authorized once (1) per month, unless the inmate can present "OPEN CASE DOCUMENTS" that consist of deadline or be within statutory post conviction deadlines.

LEGAL MATERIAL REQUEST (Case, Statutes, AR's / AD's, Law Book, etc) *Please Send Everything*

Request Description	YES	NO	ISSUED
Book # <u>ARCP Rule 1 thru 12, Act 422 of 1949, ACA, 19-10-201</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Safety Kansas policy issued in 2011 or first 2012 maybe before that</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>copy of 2012 calendar for court, civil, small claims</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>copy of the rules Sanitation (Hall Porters) workers - one type of form</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>copy of the rules for (Barrack Porters) workers - one type of form</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>contact L. L. Callaway, Sanitation Supervisor for both types of forms</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>she has these on file and in his office "Public Records"</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Only two (2) books or six (6) cases may be checked out at a time. All items must be returned to receive other legal materials. Unless the inmate can present "OPEN CASE DOCUMENTS" that consist of deadline or be within statutory post conviction deadlines. An Index of Law Library materials is available upon request to the Law library Supervisor.

LEGAL ASSISTANCE:

When an inmate is unable to make meaningful use of the Law Library on his own he can request assistance in preparing and filing legal papers from the ADC Attorney for Inmates.

Inmate Signature: Daniel Sanders

Date Requested: 1/31/14

Program Specialist Signature: _____

Date Received: _____

Library Supervisor Signature: _____

Date Received: _____

Law Clerk Signature: 2-1-14 (PW)

Date Filled: 2-1-14

Program Specialist Signature: _____

Date Issued: _____

Inmate Signature: Daniel Sanders

Date Received: 2/4/14

Arkansas
State Claims Commission
APR 03 2014

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ARKANSAS
BOARD OF CORRECTIONS
COMPLIANCE DIVISION
POST OFFICE BOX 20550
WHITE HALL, ARKANSAS 71612-0550
 Phone: (870) 267-6752
 Fax: (870) 267-6755

Exhibit A

TO: Inmate Daniel Sanders
 ADC # 94279
 Varner Super Max Unit

FROM: Melody Peacock Barnett *MB*
 Attorney for Inmates

RE: **REQUEST NOT A LEGAL MATTER WITHIN THE PURVIEW OF THE INMATE ATTORNEY**

DATE: February 6, 2014

(Commonly, these requests which are not within the purview of the Inmate Attorney involve one or more of the following):

- A. Internal Rules, Regulations, and Procedures of the ADC or the ACC.
- B. Jurisdiction under the Parole Board.
- C. Department of Community Correction (Parole/Probation).
- D. Interpretation or Application of an Act of the General Assembly or a Statute by the ADC or ACC
- E. LEGAL ACTION (Remedy) is against the ADC, ACC or medical services, including Arkansas State Claims Commission cases and §1983 cases.
- F. Computation of Sentence/Time by the ADC or ACC.
- G. Transfers out of State or to another unit.
- H. Grievance procedure, classification, enemy alert, Unit Policy, etc.

**** READ THE INMATE HANDBOOK**

Inmate Sanders: I have attached a copy of my previous response. I am unable to assist you with any of your new requests. In addition, I do NOT have a deadline in which to respond and it is not within your purview to give me one. Please note that future letters containing requests NOT within the purview of the Inmate Attorney will NOT be answered.

Exhibit A

Melody Barnett

From: Melody Barnett
Sent: Monday, December 16, 2013 5:50 PM
To: Gloria Thompson (ADC)
Subject: Daniel Sanders

Mark Colbert received a letter from Daniel Sanders, ADC 94279 dated 11/6/13 and forwarded it to me. I receive 100's of letters and answer according to a priority system. Since I will be unable to assist Inmate Sanders, I have not yet answered his letter. Please forward this response to Inmate Sanders.

Inmate Sanders:

You addressed several issues in your request but I am unable to assist you further. 1. This office does not set Unit Policy. 2. Although you did not ask a specific question about post-conviction remedies, I know of nothing available after over 17 years. 3. You are able to read and write and properly use the forms available to you to request materials from the law library. Therefore, you are able to make meaningful use of the Law Library.

Melody Peacock Barnett

Attorney, Compliance Division
Arkansas Board of Corrections
PO Box 20550
White Hall, AR 71612-0550
Phone: (870)267-6752
Fax: (870)267-6755
melody.barnett@arkansas.gov

Confidentiality Notice: This e-mail message and any attachments is attorney-privileged and is the property of the State of Arkansas and may be protected by state and federal laws governing disclosure of private information. It is for the intended recipient only. If an addressing or transmission error has misdirected this e-mail, please notify the author by replying to it. If you are not the intended recipient you may not use, disclose, distribute, copy, print or rely on this e-mail.

*Note: See VU policy 14.7.0 Section A no restrictions on Attorney for Inmates
And VU policy 14.1.0 Section VI Procedures # 4*

3/14/14 Exhibit
Witness: Co. II O. Wells, Sgt. Andrews, Sgt. Fouts
Delivered
By Ms. K. O. Thompson
on 3/14/14 at 3:12pm
See Camera Room 11 on CBS door
Witness O. Wells call feeding Chow at
my cell. And lower camera in the cell block,
5, 510 cell. At 4:50p Sgt. Andrews, Sgt. Fouts
came down and discuss this issue about this
on 3/14/14.

TO: Inmate Daniel Sanders
ADC # 94279
Varner Super Max Unit

FROM: Melody Peacock Barnett
Attorney for Inmates

RE: REQUEST NOT A LEGAL MATTER WITHIN THE PURVIEW OF THE
INMATE ATTORNEY

DATE: February 6, 2014

(Commonly, these requests which are not within the purview of the Inmate Attorney involve one or more of the following):

- A. Internal Rules, Regulations, and Procedures of the ADC or the ACC.
- B. Jurisdiction under the Parole Board.
- C. Department of Community Correction (Parole/Probation).
- D. Interpretation or Application of an Act of the General Assembly or a Statute by the ADC or ACC
- E. LEGAL ACTION (Remedy) is against the ADC, ACC or medical services, including Arkansas State Claims Commission cases and §1983 cases.
- F. Computation of Sentence/Time by the ADC or ACC.
- G. Transfers out of State or to another unit.
- H. Grievance procedure, classification, enemy alert, Unit Policy, etc.

Arkansas
State Claims Commission
APR 03 2014
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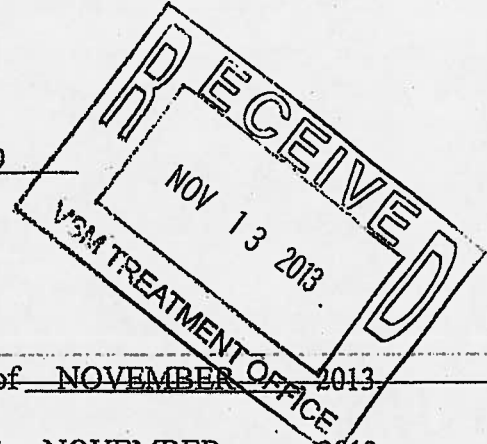
**** READ THE INMATE HANDBOOK**

Inmate Sanders: I have attached a copy of my previous response. I am unable to assist you with any of your new requests. In addition, I do NOT have a deadline in which to respond and it is not within your purview to give me one. Please note that future letters containing requests NOT within the purview of the Inmate Attorney will NOT be answered.

VARNER SUPERMAX UNIT
APPROVAL / DENIAL FOR LEGAL
COPYING / TYPING

NAME: DANIEL SANDERS ADC#: 94279

LOCATION: CB-5-10



Your request for copying was received on the 6TH day of NOVEMBER, 2013.

Your request for copying was approved on the 6TH day of NOVEMBER, 2013.

Your request for copying is being denied on the _____ day of _____, 2013 because:

Your request for typing was received on the _____ day of _____, 2013.

Your request for typing was completed on the _____ day of _____, 2013.

Your request for typing is being denied on the _____ day of _____, 2013 because:

IN ACCORDANCE WITH VARNER UNIT POLICY 14.7, U. S. SUPREME COURT
DOCUMENTS ARE THE ONLY DOCUMENTS THAT MUST BE TYPED. ALL OTHER
DOCUMENTS CAN BE HANDWRITTEN.

MS. G. EVANS, LAW LIBRARY SUPERVISOR *G Evans*

DATE: 11-7-13

COMMENTS: REQUEST AND APPROVED FOR FIVE COPIES OF U.S. DISTRICT
COURT APPEAL AND AFFIDAVIT.

*****All Legal Documents approved for copying are returned to the
Varner Supermax Unit Treatment Staff for copying and distribution to
Inmates in Varner Supermax.*****

Exhibit

VARNER SUPERMAX UNIT
APPROVAL / DENIAL FOR LEGAL
COPYING / TYPING

NAME: DANIEL SANDERS ADC#: 94279

LOCATION: CB-5-10

Your request for copying was received on the 22ND day of NOVEMBER, 2013.

Your request for copying was approved on the 22ND day of NOVEMBER, 2013.

Your request for copying is being denied on the _____ day of _____, 2013 because:

Your request for typing was received on the _____ day of _____, 2013.

Your request for typing was completed on the _____ day of _____, 2013.

Your request for typing is being denied on the _____ day of _____, 2013 because:

IN ACCORDANCE WITH VARNER UNIT POLICY 14.7, U. S. SUPREME COURT
DOCUMENTS ARE THE ONLY DOCUMENTS THAT MUST BE TYPED. ALL OTHER
DOCUMENTS CAN BE HANDWRITTEN.

MS. G. EVANS, LAW LIBRARY SUPERVISOR *G Evans*

DATE: 11-22-13

COMMENTS: REQUEST AND APPROVED FOR SIX COPIES OF SMALL CLAIMS AND
EXHIBITS OF 25 PAGES.

***** All Legal Documents approved for copying are returned to the
Varner Supermax Unit Treatment Staff for copying and distribution to
Inmates in Varner Supermax.*****

RECEIVED

PTL

being after A.D. Compliance Division became aware of my filed claim on or about Dec. 13th 2013.

I b. To support this after I became aware of the Respondent's "Motion to Dismiss" on 1/31/14 filed 1/28/14 I immediately completed a legal assistance, supply/materials form on 1/31/14 where I was denied everything requested (included, legal book A.R.P. Arkansas Rules Civil Procedure) which if I would have had to study and become familiar with the time table to file a motion for extension of time on the Motion to Dismiss by Respondents. See Exhibit IVX from 3/4/2014

waits I filed a several Motions to the Claims Commission received on March 4th 2014 but was not heard on March 6th 2014 by Arkansas State Claims Commission Committee due to the delay created by the Respondent's (A.D.) actions hindering me directly & ~~indirectly~~ indirectly from other to Compliance Division personnel who work with the Respondent's Attorney. Which I have further proof because of a slip up on documents denying me copies for this motion, see exhibit A dated 3/7/14.

II. Sir the A.D. (Arkansas Department of Correction) has always been working behind the ~~scen~~ scenes to stop, slowdown, and sabotage this claim because of the facts which Sir the Claims Commission Comm^{tee} wasn't able to hear or see the rest of the exhibits & evidences presented by Claimant on March 4th 2014 because it wasn't scheduled for you all hearing on March 6th 2014 due to the above stated reasons against the Respondent's

Pitt

tampering and hindering this claim. Also in trying to prepare this motion and once again have copies made. The Respondents boldly advised the Vanner Unit Law Library Supervisor Mr. L. Evans not to make copies of the exhibits, AR^s AD^s etc. for me thus hindering me providing the correct copies to Arkansas State Claims Commission. On March 7th 2014 See Exhibit A.

III. The motions filed on March 4th 2014 Sir was denied the evidence & exhibits to help further show facts to support my claims NO: 14-0441-LK. I stated this hinderance in Exhibit IVa thru IVc grievance vs m-13-03122 of original claim by Claimant, filed on 12/2/13. Now Sir, the Respondent finally turned over those AR^s AD^s and V^s policies after their "Motion to Dismiss" had been filed, so you are able to review them if this Motion for a Reconsideration is granted by the Committee.

There is also new damage evidents in a couple of the other motions filed on March 4th 2014 to support Claimant's claims of fact which wasn't made available until after Claimant had tried putting together a motion for a extension time because I wasn't aware of the deadline because of interference by Respondents hinderance of legal books, etc. requested. Which shows a direct confirmation of my injuries sustained from the chemicals in my right eye, done by a Respondent's employee, "Exhibit XII" with her signature the Regional Medical Grievance Officer for the A.D.L., Ms. L. Gardner

IV. Sir All this evidences more was denied to me all through these proceedings by the Respondent (A.D.) and they went so far as to mislead, misdirect, and out right give false information to the Arkansas State Claims Commission. Which if the Committee grant this motion for Reconsideration so they can go back and have a chance to review the (2) four motions filed on March 4th 2014 by claimant to support his claim #14-0441-LI, which wasn't reviewed on March 6th 2014 when deciding to grant Respondent's Motion to Dismiss. Only a motion for a extension of time filed by Claimant which was denied. But by being able to review these motions, the Claims Committee will see that Claimant's claim was true with facts and relief sought could & should be granted to the Claimant.

V. Also presented is a copy of the letter from the Attorney for inmates who denied to help & assist me after I wrote her 2 times and responded just only on 2/1/14 denying to help me, but behind my back on 3/1/14. She & co-workers was sabotaging my claim further with advising the legal Supervisor for Varnet/VSM Unit Law Library on what to not do to hinder my claim. Ms. G. Evans is her name, and also I have (2) two A.D. employees who don't want to be named. Will testify to this claim & to talking to the Respondent's Lawyer/Attorney who advised them to deny me any access what so ever as of now on this claim. I can't name them as of now for fear of losing their job. Also claim providing (2) two other legal approval slip for legal assistant on copying exhibits, A.R. & Dets. And Ms. G. Evans was the Law Library Supervisor in charge and they were approved with no problems until claim was filed.

Wherefore for the reasons under Rule 7.1 Re-
Hearing/Reconsideration my motion be granted
and Claimant's Claim not be Dismissed but
set for a hearing and relief granted to Claimant,
and motions filed, be reviewed by the Claims Commission.

Respectfully Submitted

Claimant Pro Se:

Daniel Sanders # 094279

Daniel Sanders # 094279

Pro Se

VSM Unit

P.O. Box 200

Bradley, Ar. 71644-0200

Certificate of Service

I certify that a copy of the foregoing Motion be
served upon Respondent once filed marked by Claims
Commission and forward to them by placing a filed
marked copy in US mail.

cc Lisa Mills Wilkins Ark. Bar # 87190

Attorney Supervisor for (ADL) Respondent

P.O. Box 8707

Pine Bluff, Ar. 71611

STATE CLAIMS COMMISSION LOCKET
OPINION

Amount of Claim \$ 25,000.00

Claim No. 14-0441-CC

Daniel Sanders, #094279 Claimant
vs.

Attorneys
Pro se Claimant

Department of Correction Respondent
State of Arkansas

Lisa Wilkins, Attorney Respondent

Date Filed December 2, 2013

Type of Claim Personal Injury, Pain & Suffering,
Mental Anguish, Negligence & Failure
to Follow Procedure

FINDING OF FACTS

The Claims Commission hereby unanimously denies both of Claimant's "Motions for Reconsideration" for the Claimant's failure to offer evidence that was not previously available. Therefore, the Commission's March 6, 2014, order remains in effect.

IT IS SO ORDERED.

(See Back of Opinion Form)

CONCLUSION

The Claims Commission hereby unanimously denies both of Claimant's "Motions for Reconsideration" for the Claimant's failure to offer evidence that was not previously available. Therefore, the Commission's March 6, 2014, order remains in effect.

Date of Hearing April 10, 2014

Date of Disposition April 10, 2014

Hudson Chairman
Datmora Commissioner
Bill Lancaster Commissioner

**Appeal of any final Claims Commission decision is only to the Arkansas General Assembly as provided by Act #33 of 1997 and as found in Arkansas Code Annotated §19-10-211.

Daniel Sanders
Ark # 094279
1.51

Claimant
Claim # 14-0441-KK

Ark. Department of Correction Respondent

PI
4/13/14

Arkansas Claims Commission

APR 15 2014

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Appeal to General Assembly
on Claim # 14-0441-KK.

I. Appeal to the General Assembly to fully review my Claim # 14-0441-KK on its merits to overcome the Claim Commission unanimously decision of Dismissing my Claim when I've showed that the Respondent tampered or hindered my Claim, one way or another. But the Ark State ignored this in motions from March 04 2014 which wasn't heard at the Ark State Claims Commission on March 06 2014. Only heard motion for Extension which was denied. And Respondent's motion to Dismiss granted.

II. Claimant filed motion for Reconsideration to Ark. State Claim Commission on March 21, 2014 to support new evidence of Respondent's Ark. Department of Correction employees hindering & tampering with Claimant's Claim on several different occasions but State Commission was bias or prejudice in their unanimously decision denying Claimant Claim etc. no matter what I provided.

III. Claimant provided a claim which relief could be granted but was denied ever scheduling any type of hearing for Claimant Claim and every motion ignored by the

Ark. State Claims Commission on April 10, 2014.

IV

I'm requesting a whole re-hearing to be present to present my claim to the committee in front with every thing filed to have a fair hearing that's not bias or prejudice just because the Ark State Claims Commission can do it.

Respectfully Submitted

Clément Pro. SE:

Daniel Sanders # 094279

Daniel Sanders # 094279

Pro SE

VB M Unit

P.O. Box 600

Grady, Ar. 71644-0600

Certificate of Service

I certify that a copy of the foregoing Motion/Affidavit be served upon Respondent once filed marked by Claims Commission and forwarded to them by placing a filed marked copy in U.S. Mail.

cc: Mrs. Lisa Mills Wilkoff Ar. Bar # 87190

Attorney Supervisor for (ADL) Respondent

P.O. Box 8707

Pine Bluff, Ar. 71611