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Arkansas State Claims Commission

BEFORE THE STATE CLAIMS COMMISSION Of the State of Arkansas

MAY 09 2024

RECEIVED

- Mr. Mrs. Ms. Miss

Shane Lonix (ADC [redacted]), Claimant

vs.

State of Arkansas, Respondent

Do Not Write in These Spaces. Claim No., Date Filed, Amount of Claim \$, Fund

COMPLAINT

Shane Lonix (ADC [redacted]), the above named Claimant, of [redacted] (City)

AR. [redacted] (State) by Shane Ashton Lonix - inmate (Legal Counsel, if any, for Claim) (Phone No.) (Fax No.) says:

State agency involved: Arkansas Division of Corrections Amount sought: \$15,000 fifteen thou.

Month, day, year and place of incident or service: 2-15-24, February 15th 2024 [redacted] Unit Hallways & Max 8 b/c.

Explanation: This claim is because of the use of excessive force and retaliation of the Arkansas division of corrections [redacted] staffed employee Captain Lane. On 2-15-24 between 9:pm-1:Am as shown on video camera footages from max 8 barrack into hallways, and in the/to the area of the max administration door... Inmate Lonix-145216 was mis-treated, humiliated, and abused/Assaulted by ADC staff while restrained. As Inmate Lonix was escorted while in handcuffs down steps into the violent an aggressive Cpt. Lane's grasp "hands", lonix's left arm was jerked an slammed into Riot Gate, shackle restraints were ordered around his ankles. Inmate Lonix gave no reason he were viciously attacked, abused, and tortured throughout hallways. These same handcuffs an shackles restraints were lifted into the air by ADC staff cpt. Lane's leadership, orders stating "Let him fall" and Inmate Lonix's left shoulder an neck were forced to the hard surface floor... by the pull of cpt. Lane's strength. I seek \$9,000 for general damages, \$3,000 pain and suffering damages, \$2,500 for punitive damages, \$500.00 for special damages. Breach of fiduciary duty by cpt. Lane. Also cruel and unusual punishment.

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? (Yes or No) when? 2-26-24 (Month) (Day) (Year) to whom? prea statement signed ADC (Department) and that the following action was taken thereon: None

and that \$ None was paid thereon: (2) Has any third person or corporation an interest in this claim? No; if so, state name and address

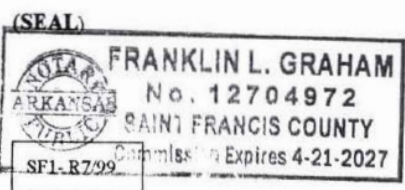
and that the nature thereof is as follows: Retaliation, use of excessive force and cruel and unusual punishment. Breach of fiduciary duty; and was acquired on 2-15-24 in the following manner: ADC Staffed employee at [redacted] Lane harmed inmate Lonix while he were restrained.

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.

Shane A. Lonix (Print Claimant/Representative Name) [Signature] (Signature of Claimant/Representative)

SWORN TO and subscribed before me at \_\_\_\_\_ (City) (State)

on this 27 day of April, 2024 (Date) (Month) (Year)



[Signature] (Notary Public) My Commission Expires: 4 21 2027 (Month) (Day) (Year)

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MAY 2 1954  
RECEIVED



Form 40

800-4

STATE OF ARKANSAS )  
COUNTY OF Lee )§

**AFFIDAVIT**

I, Shane A. Lonix, after first being sworn, do hereby swear, depose and State that: On 2-15-24 between 9:pm-1:Am placed in the aggressive hold of Captain Lane... Left arm jerked, slammed, an grinded onto max 8 batrack riot gate while in handcuffs, then, Inmate Lonix [redacted] was placed in Anckle restraints. witnesses of EARU ABC Staff CO-White and Sgt. Jackson... while cpt. Lane forced Inmate Lonix to the floor, tugged, pulled, and dragged, then carried in main hallway in front of the max administration. Left area again abused by cpt. Lane. Lonix was placed in hallway holding cage, pushed, shoved, in the back as his head "top head" hit the wall. "I felt a cool rush", as Inmate Lonix was pulled back out of cage and swept, Lifted, grabbed from his feet, "ankles", Legs as the orders of cpt. Lane stated "Let him drop", "Let him fall" !.. "I were then pulled, jerked, from the bean of my torso to the case as I were forced to the floor once more" [redacted] first because of cpt. Lane, [redacted] Video footages, camera [redacted]

Notice of memorandum - [redacted]

I further swear that the statements, matters and things contained herein are true and accurate to the best of my knowledge, information and belief.

3-15-24  
DATE

Shane Lonix  
AFFIANT

[redacted]  
SOCIAL SECURITY #

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 13 day of April, 2024.

Franklin L. Graham  
NOTARY PUBLIC

My Commission Expires



Form 40

800-4

STATE OF ARKANSAS )  
 ) §  
COUNTY OF Lee )

**AFFIDAVIT**

I, Shane Ashton Lonix, after first being sworn, do hereby swear, depose and State that: I was punished more than the law allowed. This is cruel and unusual punishment. on 2-15-24 between 9:pm-1:Am cpt. Lane violated protocol on an escort for an inmate, this is a failure to "Breach of Fiduciary Duty". And because I was handled incorrectly after an incident, this is Retaliation. Captain lane has violated all 3 of my claims leaving me in punishments I can not bare to withstand. because of cpt. Lanes decisions, orders, and actions I am in dispair of happiness. That if my grievances had been treated correctly, my endurance of living might have been more comfortable for me to bare. because I am No doctor and without a degree in medical, all I can state is how p[REDACTED] up "I say No" because I have to move, and I stand "I say why can't anyone/anything help me" because I feel hurt?

I further swear that the statements, matters and things contained herein are true and accurate to the best of my knowledge, information and belief.

4-24-24  
DATE

Shane Lonix  
AFFIANT

[REDACTED]  
SOCIAL SECURITY #

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 27 day of April, 2024.

Franklin L. Graham  
NOTARY PUBLIC

My Commission Expires:



STATE OF ARKANSAS )  
 ) §  
COUNTY OF Lee )

**AFFIDAVIT**

I, Shane A. Lonix, after first being sworn, do hereby swear, depose and State that: on 4-16-24, cpt. lane sprays "can of mace" on inmate housed in 227 cell as his exit while in handcuffs, cpt. lane tases the inmate. 4:10 pm. The taser light was on as cpt. lane dispersed its contents into the inmate. I seem more vulnerable to the atmosphere as these acts from cpt. lane continues as seen on video camera of max 2 barrack, the inmate who was forced to the floor. This treatment sets a flair to my emotions and physically, I feel [redacted] because cpt. lane is/has been forcing my motions to respond in some way. [redacted] force and/or velocity movements of unwanted tentacles. I'm asking that cpt. lane be removed from ADC Job Duties or my release from prison in order to dis-mantel this unnecessary unwanted vibe that something bad will happen if cpt. lane has to interact with me. I personally do not trust the mails system, I'm requesting our communication by Tablet device.

I further swear that the statements, matters and things contained herein are true and accurate to the best of my knowledge, information and belief.

4-18-24  
DATE

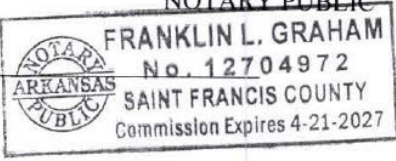
Shane Lonix  
AFFIANT

[redacted]  
SOCIAL SECURITY #

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 27 day of April, 2024.

Franklin L. Graham  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_



5

STATE OF ARKANSAS )  
 ) §  
COUNTY OF Lee )

**AFFIDAVIT**

I, Shane A. Lonix, after first being sworn, do hereby swear, depose and State that: on 2-15-24, between 9:pm-1:Am, I were punished by cpt. Lane more than my allowed prison sentence punishment. The major problem is that inmates such as me are being protected under the security of 18-35 year olds... individuals who are under the age of me, [redacted] , who the guard of AOC still carry the pressure of unstable methods. It scares me because I'm here to serve a life w/o sentence,

[redacted]  
Someone who is over the age of 38 years old and who struck blood from my body and ordered the younger APC staff to participate with illegal actions as the Inmate handbook of 2020 mission statement states: "Strengthen the work ethic through teaching of good habits, and provide opportunities for staff and inmates to improve..."

I further swear that the statements, matters and things contained herein are true and accurate to the best of my knowledge, information and belief.

4-17-24  
DATE

Shane Lonix  
AFFIANT  
[redacted]  
SOCIAL SECURITY #

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 27 day of April, 2024.

Franklin L. Graham  
NOTARY PUBLIC



My Commission Expires:

STATE OF ARKANSAS )  
 ) §  
COUNTY OF Lee )

**AFFIDAVIT**

I, Shane A. Lonix, after first being sworn, do hereby swear, depose and

State that: On 4-3-24, I were strip-search in order to attend yard call and told to  
[redacted] 3 times because Sgt. Sanders didn't want to move along while I  
stood Naked in front of her... She asked Sgt. King, "What chu think" ? Sgt. King handled  
me correctly. On 4-4-24, max cell 426 threw pieces an urine onto floor at 427  
cell, but No punishment lead. My question are; why are these video cameras operating ?  
if an inmate harms, threatens, or agitate a APC worker he/she is punished, but  
as a inmate who needed safety, security, and protection from another inmate was  
Not provided by [redacted] staff and has Not been provided by APC workers. why ?  
the problem is, most black females finds me attractive and it's Not such a higher percentage  
with the caucasian female. But, there are No excuses that these situations <sup>Should</sup> ~~deserve~~  
Not deserve, proper precautions ? proper treatments ? I called Prev-Hotline, stated my Name but got NO response.

I further swear that the statements, matters and things contained herein are true and accurate to the best of my knowledge, information and belief.

4-4-24  
DATE

Shane Lonix  
AFFIANT

[redacted]  
SOCIAL SECURITY #

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 27 day of April, 2024.

Franklin L. Graham  
NOTARY PUBLIC

My Commission Expires:



~~Notice of  
motion~~

Informal Investigation 1-5

Motion to Compel Answer

FRCP-16

my Name is Shane Ashton Lonix born [REDACTED] creole from Fort Polk, Louisiana  
An army base? Prison sentence "plea-deal" signed Nov. 10, 2010 Wrightsville Unit  
Arkansas - Life w/o parole sentence?

FRE-901,902

Documented Facts: 2012, [REDACTED] unit-ADC guard "mazzoni" orders inmate to  
to "catch your rack", Lights out and exits 14 brk. minutes later instead of  
writing a disciplinary or calling the All available staff call, ADC guard rips blanket  
off the table while 2 inmates played dominoes? incident occurs?

2013-2015 [REDACTED] unit, inmate Dereck Irland "Crispy" burns inmate Lonix's  
jointed lighting fixture, but inmate Lonix was charged by [REDACTED] unit ADC staff  
over \$825.00?

2017-2018, [REDACTED] unit, ADC sargent "Female" places inmate Lonix under direct  
orders of entering a 2-racked cell that housed inmate Marcus Johnson "marbo"  
minutes after the refusals of both inmates? Instead of calling the All available  
staff call or writing a disciplinary, the ADC Female sargent maneuvers inmate  
Lonix into 2-male cell as inmate Lonix was fought an right knee re-injured? Disciplinary  
wrote on both inmates, but inmate Marcus Johnson was punished?

2019-2024 [REDACTED] unit, cases from inmate Lonix  
5:19-cv-00341, 4:20-cv-00179 both denied. 4:23-cv-01041, claim #24001  
claim #240637, legal mail lost/stolen and ended legal actions? FRCP-11

(Neglect) - on 1-27-24, morning time of [REDACTED] Sgt. Peacock an CO-Evans denied inmate Lonix

FRCP-32(a)(4) [REDACTED] on 1-29-24, practioner Mr. Kirkstund fails to provide medical  
FRCP-26(a)(3) services of allowing inmate Lonix to view medical jacket? on 3-8-24, medical

FRE-803(5) - practioner Ms. Bennett fails to produce [REDACTED]

[REDACTED] on 1-29-24 Captain Lane signs first step process of a medical  
grievance... which was avoided and never returned back to inmate Lonix? All  
grievances signed by ADC [REDACTED] staff were abandoned such as: 12-6-23 by Sgt.  
Jackson, 12-10-23 by Sgt. Johnson, 2-27-24 by Sgt. King And 3-22-24 by Sgt. Nickens?

Shane Jones

pg. 2

RCP-38 Inmate Lonix- [REDACTED] were Not able to proceed with any grievance of the said Staff of ADC? Due to the failures of ADC, [REDACTED] Staff members Negligences.

On 11-2-23, afternoon time at the [REDACTED] Inmate Lonix were sent to/placed in isolation one, 16 cell by Lt. Kelley? Since then, Inmate Lonix Never received correct/Normal treatment services, which lead to inmate Lonix filing grievances, placing \$3.00 [REDACTED] sending many inmate request forms, sending out letters, and making [REDACTED] signed statement on 2-26-24?

RCP-4, 8 on 2-15-24 between 9:pm-1:Am minutes after the attack of cpt. Lane and picture, RE-409 - he states "I will Never do that again"? And "He prefers to see a man", while cpt.

RE-803, 804 - Lane persuades the female Nurse to [REDACTED], she leaves?

on 2-15-24 between 9:pm-1:Am at EABU as seen on video camera footages; max 8 barrack, and throughout hallways onto the max administration door area? on the 2<sup>nd</sup> tier of max 822, CO-wofford orders inmate Lonix to "empty that towel out"? basically to shake myself down? Inmate Lonix- [REDACTED]? I empty a large store bought towel, containing (soap, soap dish, small towel, and Boxer short)? I was placed in handcuffs (Not locked) by CO-mr. White as I were directed from 822 cell for a shower? I hear from CO-wofford "Normally when they got an attitude like that, I usually don't take they ass to the shower"? I raised my leg/foot for the remaining chain lengthed restraints to be placed upon my ankles when Both ADC guards insisted that I move along without being fully restrained? As CO-wofford begins to grab and weigh on my left arm (shoulder), I immediately flinch and state "can CO-white grab me and can ya'll switch"? CO-wofford tightens her grip, states "No" and pushes my arm in the direction of the shower? while I started to snap away from her hysterical motion and vibe, she becomes more agitated and feminine? while she orders me back into 822 cell, I refuse and CO-wofford becomes more aggressive? Instead of ADC Staff calling the All available staff call or writing a disciplinary, I was forced to the edge of 822 cell as I used motions Not to enter, I became violent trying...

Shane S.

Page 3

## Informal investigation

to kick CO-wofford when CO-white pulled me from kicking a full force kick, while he then had full control of any of my further actions? After the All available staff call was finally made by CO-wofford, she states "I should have hit you with this bar", "I got chu", and "I'm gone get you"? moments and/or minutes pass when ADC guards I recognize, and a few I don't recognize, show up entering max 8 barrack between 9:PM-1:AM? I hear a Mexican who was housed in 824 cell while in the shower cell saying "Damn, S.A.L. go hard" Sgt. Jackson grabs my arm when I explain to him to calm down because the problem is over? He respects this notion of situation and tries to guide me out the barrack off the 2<sup>nd</sup> tier, when CO-wofford finds her way to me and nudges/shoves me in the back as I begin to step down on steps to the 1<sup>st</sup> floor? So, I pause/stop? with CO-white on my left and Sgt. Jackson on my right and females behind me blocking CO-wofford's progress? I then, lean to my front downward while Cpt. Lane was holding a can of mace in his right hand

(Retaliation) I was finally departed from CO-wofford, but Cpt. Lane switches the can of mace to his left hand when he snatches up my left arm? I was grabbed with his left hand, then yoked up and forcefully slammed into/onto max 8 barrack Riot Gate by Cpt. Lane's right hand? My left arm was <sup>repeatedly</sup> repeatedly abused and harmed by Cpt. Lane? I heard the Mexican-824 cell-shower saying "Damn, what the fuck you ain't suppose to do that"? Cpt. Lane orders that the ankle restraints be placed upon me while he banged my left arm into/onto steel/metal and forces me into the hallway out of max 8 barrack? ... while fully restrained

"Put them shackles on him"? (No Lock on restraints) from wrists to ankles? Cpt. Lane who is at least or over 215 pounds - 6'2 in height ... jerks an violently maneuvers my left arm (shoulder) and motion of my walking ability (motor ability)?

Pg. 4

I weigh [REDACTED] I gave No reason for these continued actions of Cpt. Lane. Cpt. Lane caused unnecessary force within my ability to walk and as he maneuvered my ability in harmful risks/tasks, my legs began to tremble and shake as I were tossed up and down on a [REDACTED] decides to tug, pull, and drag my left arm, then orders the remaining staff to "Pick him up"? I felt the restraints tightening as I were dropped to the floor in the area of the max administration door. I could No longer grasp and hold my belongings of my shower item that got released from my grip, do to the failure to protect an inmate at this time 9:PM-1:AM? Even though Sgt. Jackson, Female guards, and other ADC staff obeyed all orders of Cpt. Lane, there were No higher ranked staff available to stop/prevent/and/or control Cpt. Lane's motives of abuse, torture, and/or harass onto an inmate? I was stood up by Cpt. Lane's orders as he slammed my arm once more, grinds my left arm (shoulder) into/onto hallway holding cage cell... No restraints removed, but I then were forced into the hallway holding cage when I had my head down expecting the ankle restraints to be removed? Cpt. Lane shoved/pushes me in the back while I were off balance? My top head hit the wall, I got a little dizzy and felt a cold/cool rush? I became a little light-headed while I realize the cage door is being closed? To No avail Cpt. Lane re-opens the cage door and orders "Get him out"? Cpt. Lane then begins to grab at my feet/ankles and/or restraints in an immediate violent, aggressive manner and swipes me from/ scoops me up from the floor ordering to Sgt. Jackson to "Let him drop, Let him go, Let him fall"? This is a breach of fiduciary duty by Cpt. Lane? (Sgt. Jackson isn't seen after this incident working for [REDACTED] or on the compound)? (Cruel and unusual punishment because I were punished more than the law allowed?)

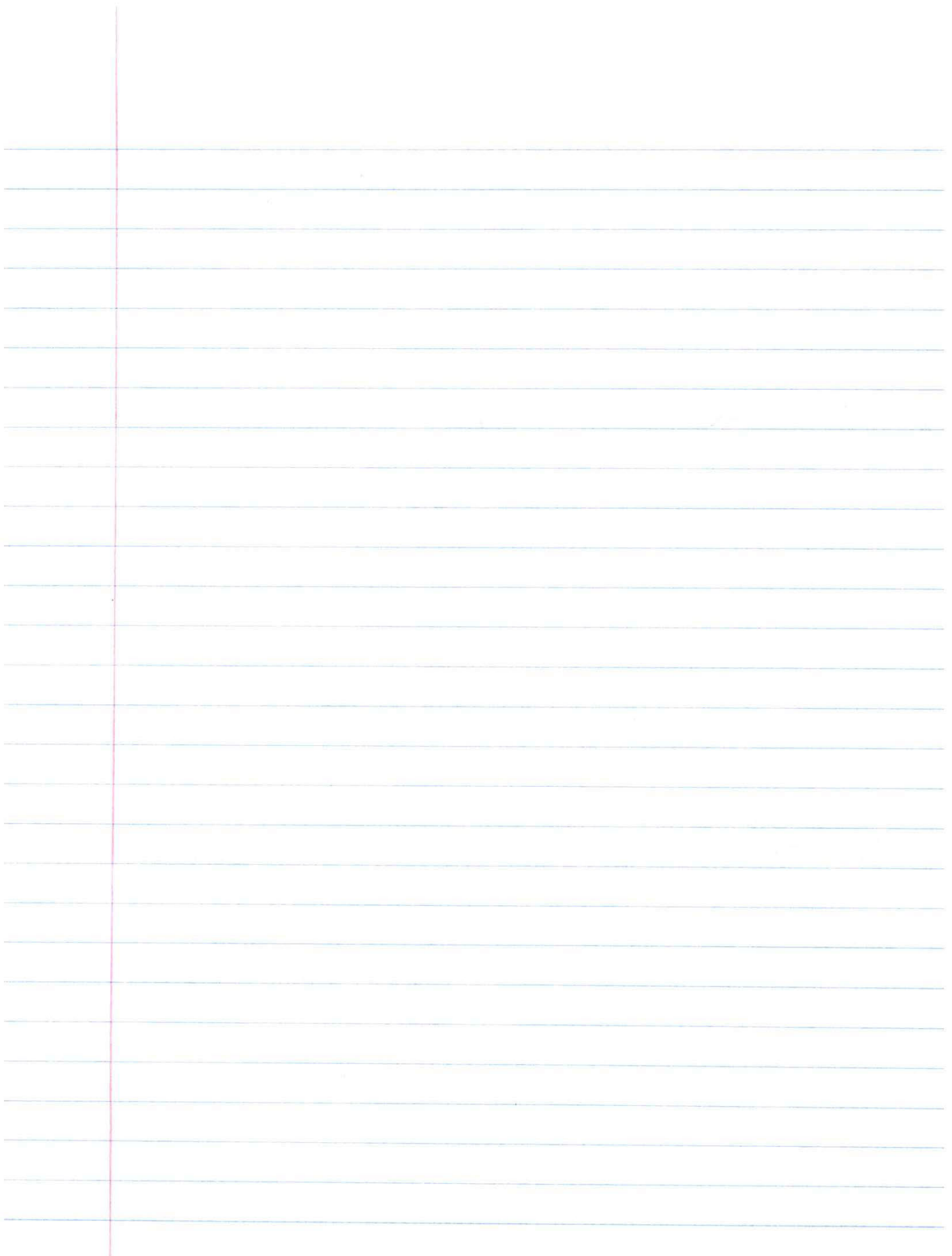
RE-407-

A. S. S.

pg. 5

## Informal investigation

- RE-701 - Sgt. Jackson States "if I let him go, if I drop him he will fall" Cpt. Lane orders once more "that's what I want, let him fall"? I were placed as an inclining lean of my torso onto that hallway holding cage cell by Sgt. Jackson and pulled by Cpt. Lane of Cpt. Lane's force until my upper half body slammed to the and hit the floor? My left shoulder and neck were slammed, battered to the hard surface floor? Cpt. Lane drops my feet, steps <sup>a foot</sup> on my back-neck, throws my helpless feet into cage, then steps on my leg and my torso is then placed into hallway holding cage cell and the door was shut and locked? A female captain from population took 2 photos of inmate Lonix moments/minutes afterwards? It is false imprisonment after I received discipline 2-21-24 and completed punitive 3-21-24, but still being housed/held captive in isolation 3-174 cell until 4-1-24 - afternoon time of released to restrictive housing in max 425 cell? I pray for relief of: \$15,000
- \$2,500 I seek punitive-exemplary damages (malicious and egregious) by ADC EA Staff Cpt. Lane's orders and decisions that harmed an inmate who was fully restrained and opposed no threat to security? Cpt. Lane did not honor the mission and vision statement of the 2020 inmate Handbook?
- \$500.00 I seek special-consequential damages because I prefer certain jobs that I am unable to obtain and perform it's required work service/duty due to my prison sentence and the neglect of being healed?
- \$9,000 I seek general-compensatory damages (actual damages) that Cpt. Lane violated protocol and obstructed justice by failing his duty to escort an inmate to safety? And Cpt. Lane used physical force to maneuver an inmate who was restrained, into harm?
- \$3,000 I seek pain and suffering damages because I am not asking ADC EARU medical to afford any medical expenses there could be, but I am requiring that the courts of allowing the accused individual/s to support my financial assessments of becoming injured mean I would like to hire an attorney to prove my nature of injuries?
- Nature of All admissions, Depositions, Informal investigation and formal etc. She,



~~Notice of motions: Summary Judgment Initial Disclosures continued~~  
 \* ADC, [REDACTED] Staff has refused to answer any request, letter, and verbal communication indicating, that the guards do Not care !

FRCP-26 | 1. I chose to meet an confer. by filing over 5 grievances, which none were returned or answered/ filed because of [REDACTED] ADC Staff ?

2. I chose to file <sup>4</sup>3:00 sick calls even though, every request for an X-ray, MRI Scan, and/or long term medical equipment were denied ?

3. I chose to write letters to law or legal advisors, even though I were Never responded back too... and/or rejected ?

4. I were assaulted by Captain Lane on 2-15-24, 9:pm-1:Am, which I were fully restrained and opposed No threat to security after cpt. Lane ha already been Notified of my medical and problems when "1-29-24" grievance was signed ? Cpt. Lane intentionally meant to harm me ?

5. I was Not fairly treated at [REDACTED] on 2-15-24, between 9:pm-1:Am ? And from 11-2-23 ?

6. Even, as these issues ~~was~~ <sup>were</sup> raised to the attentions of wardens, medical, and higher ranked Staff members... Cpt. Lane continued to work around me, which I feel unsafe, unsecure, and unprotected ?

7. The interrogatories insist of providing/introducing the inmate handbook or 2020, that enforces ADC Staff to abide by and/or follow ?

*James Dix*

Exhibit #4-B.Continued — Interrogatories to cpt. Lane

1. What is your Job duties, Title, and purpose?
2. How many All available Staff calls have you attended?
3. Before this incident, what were you an inmate Lonix's relationship if any and what inneraction had you previously had or encountered?
4. Could you or do you think you could have controlled this situation better or worst?
5. Did you state to inmate Lonix after the incident that "I will Never do that again"?
6. Did you question the inmate, of why this incident took place "occured" or Did you care about the Nature of the incident?
7. Did you drug test anyone the day of or after?
8. Did you feel threatend ~~by~~ inmate Lonix at anytime?
9. Did inmate Lonix give any resistant force or make any threats to you or ADC staff?
10. Did you abide by and/or follow the 2020 inmate handbook policy of the mission statement, vision statement, and the entire rules of the book itself?

pages 1-3

initial Disclosures

FRCP-26(a)(3) - 32

ADC Staff of [REDACTED], who are likely to have information about the incident on 2-15-24 between 9:PM-1:Am ? Share Lonix to testify ?

- Mr. CO-White - will testify ~~to~~ events and conversations before an After  
+ And during the escort of inmate Lonix ?

- Sgt. Jackson - who I have no longer seen since this incident should testify of personal knowledge of the escort between cpt. Lane and inmate Lonix ?

- 2 inmates - who've witnessed the ending of the escort in main hallway holding cage, in front of the max administration door. <sup>should</sup> ~~with~~ testify " ?

- Sgt. Nickens, Sgt. Johnson, Sgt. Jackson, cpt. Lane, Sgt. King - Should testify that they have signed my grievance on the dates presented ?

- Sgt. Sanders and Sgt. King - Should testify of the actions and conversations before a yard call escort ? 4-3-24.

- Sgt. Graham and CO-Hobbs - Should testify of an escort on 1-29-24 ?

- Warden Richardson - Should testify of any requests received from inmate Lonix and ~~the~~ classification appearances of inmate Lonix ? 3-27-24

- mental health ms. Jones - Should testify how ADC guards rush her off on each visit she's had with inmate Lonix ? 4-3-24.

- Major Taylor - Should testify how he's refuse to document my legal claims and acknowledge ~~inmate's~~ Lonix's requests, 3-1-24 ?

- Female Guards - Should testify their escorting procedures ?

- Documents and tangible Things : Female Captain should testify on the picture she took of inmate Lonix ?

- video Footages on camera ?

- on 4-27-24 on white was said to be stabbed. Testimony Needed ? 10:pm

- Debra mein - to testify how the 4 page grievance and grievance procedure operates?
- Ashley King - of [REDACTED] [REDACTED] to testify how the 4 page grievance and grievance procedure operates?
- CO-Wofford - to testify how ABC staff and security operates on a routine 12 hour shift?

initial disclosures continued

- Each inmate of ADC are entitled to: 2 pair Boxer shorts, 2 pair Sock Canvas shoes, Pillow, pillow case, mattress, 2 sheets, blanket, if cold 2 thermal Tops and Bottoms, Taboggan, Jacket, if indigent \$12.00 monthly 2 roles of tissue, soap, toothbrush, toothpaste, clothing "jumpsuit/sta clothes", Laundry bag, a yearly earning of \$15.00, and access to Commissary
- I've been housed as an inmate since 2009 - 2024 and deprived of most items from 11-2-23 to 5-1-24... by [REDACTED]? And continued to be deprived 2024?
  - inmates are also entitled to 3 meals per day, showers per week, and News and/or T.V. material per day? The use of a phone daily?
  - All of which, To house one inmate at [REDACTED] is Not cheap and require funding to some/a portional degree?
  - inmates are also entitled to a face towel, big towel, and the inmate handbook?
  - Under stricked provisions, I am entitled to living in prison? meaning, I don't just spend time in prison, I actually live here?
  - Cpt. Lane violated a Legal rule of the 2020 inmate handbook?
  - if every ADC official acted the same as Cpt. Lane on 2-15-24, my claim would be voided and incorrect... but, Since the [REDACTED] ADC staff are Not treating every escorted inmate such as Cpt. Lane did on 2-15-24 between 9:pm-1:Am? Inmate Lonix should be entitled by Law to compensation of \$15,000? if, all daily, weekly, and/or monthly items from 11-2-23 until 5-1-24 were destroyed upon inmate Lonix, this total of items would exceed over \$15,000 in timely manners?
  - I don't understand anything free because I've worked for money from the age of 14 years

Shane Lonix

A blank sheet of lined paper with a vertical red margin line on the left and horizontal blue lines for writing. The paper is otherwise empty of text or markings.

Notice of  
Motion  
to add?

pg. 6

## Subpoena Production of Documents FRCP-34

- Subpoena Duces Tecum: video footages on camera of East AR. Regional unit, Max 8 and Hallways ? in front of the Max administered Door ? 2-15-24 between 9:PM-1:AM (requesting All Exhibits into Evidence

- Picture taken of Inmate Lonix by population Female Captain 2-15-24

~~FRCP-26-30~~ population Female Captain, cpt. Lane, CO-white, Sgt. Jackson, Lt. Watson, Lt. Ke Sgt. Johnson, Sgt. Nickens Lt. King, Sgt. Peacock, Sgt. Gramm, CO-Hobbs, CO-Evan. mental health Jones, Practitioner Bennett & Kirstand - ~~FRCP-27-32~~

- Custodian of Records ? [REDACTED]

4-25-24 - Affidavit's ? from the date of this request, documents be delivered ?

Exhibit # 1-A. Grievance 1-29-24 cpt. Lane

B. Grievance EAM24-00424 Aundrea Culclager

C. Grievance 3-22-24 Sgt. Nickens

D. Grievance 2-27-24 Sgt. King

F. Grievance 2-27-24 Sgt. King

F. Grievance 12-10-23 Sgt. Johnson

G. Grievance 12-6-23 Sgt. Jackson

H-I Grievance Coordinator Ashley King Cummins unit 8-2-23, 7-27-23

Exhibit # 2-A. 2-27-24 9:AM items in Isolation Sgt. Westbrook/McKnight

B. Receipt of denial 2 spoons 3-20-24 commissary

C. Yearly earnings 12-19-23

D. Commissary purchase items 2-1-24

E. 9-26-23 denial by Warden Pierce Cummins unit

Exhibit # 3-A. Disciplinary 2-20-24 & Noted material of remedies

B. Noted material of remedies

C. Noted material

D. Noted material

E. Appeal 2-21-24 denied

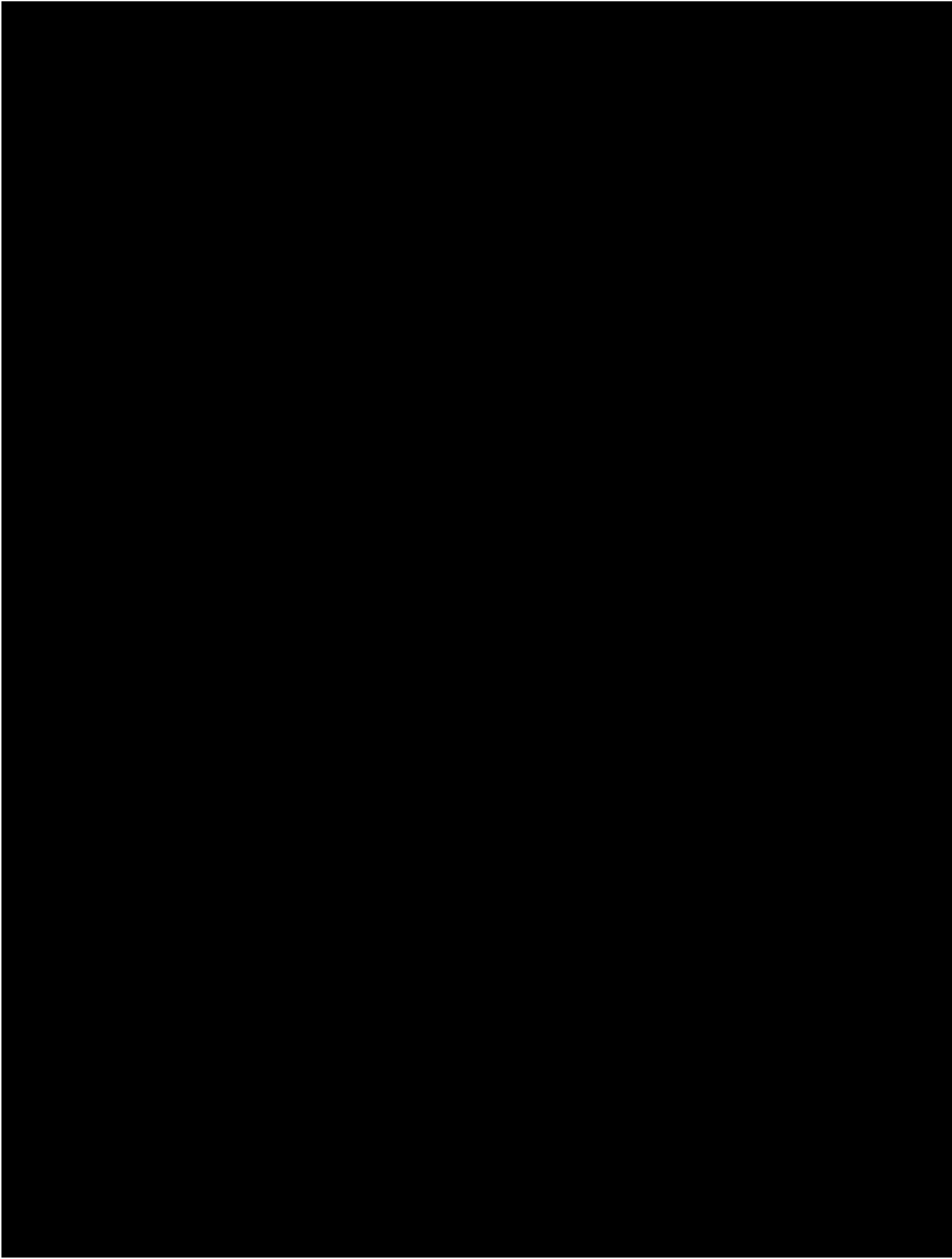
Exhibit # 4 A O's a.s.a.m / Exhibit # 4-B. Inmate Handbook

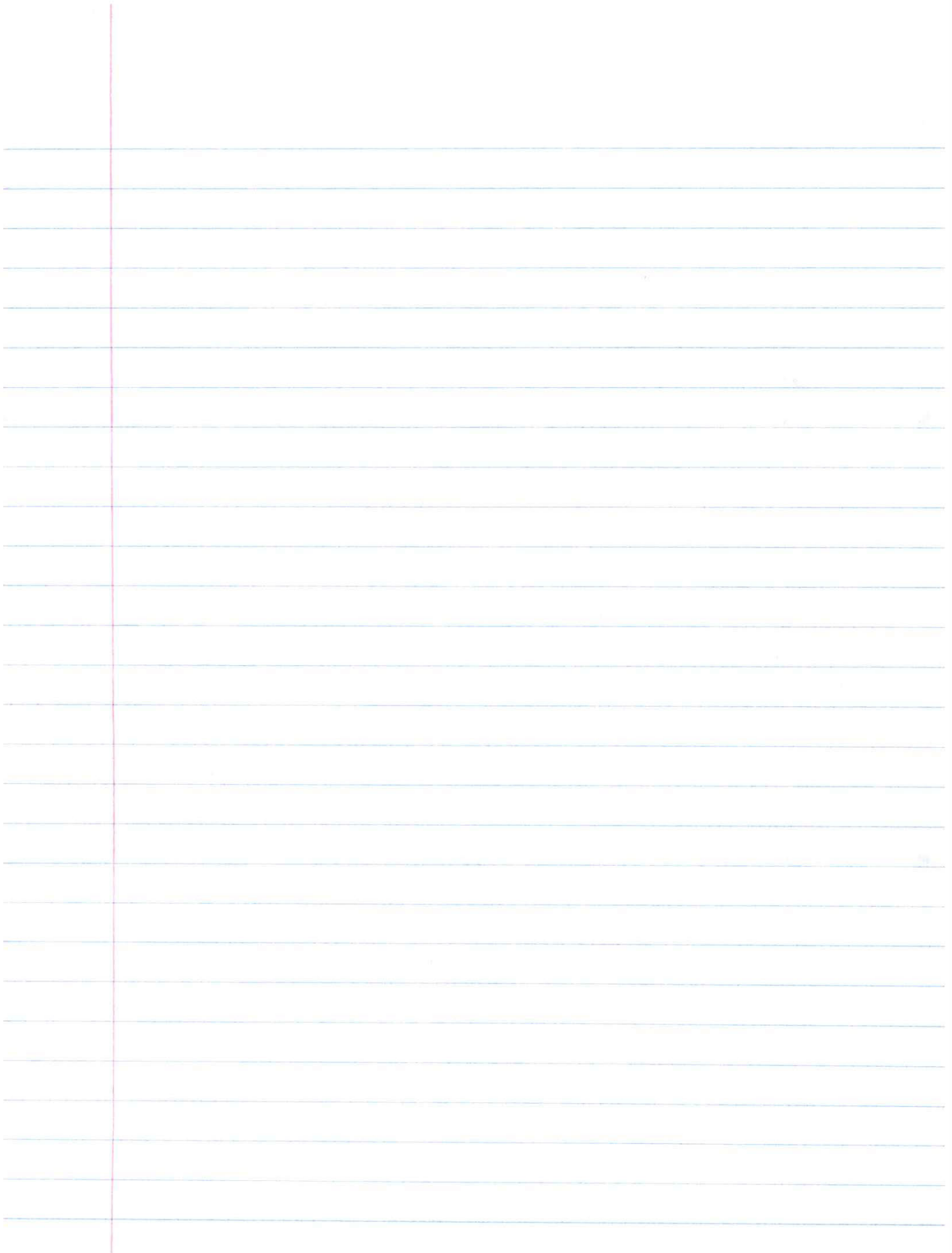
Joe Lutz

Exhibit # 5 - Grievance by Lt. Watson on 4-3-24, "the Nature of this grievance was informing ADC staff that No other grievance were returned an yet signed of first Step... but, it too was Never returned of Second Step process and completion of 1<sup>ST</sup> Step.  
 The signing of early morning time.

- Affidavit's 1-6 -
- opposition Statement -
- Claim - and brief forms. -
- Initial Disclosures -

Exhibit # 6 - the original grievance.







UNIT LEVEL GRIEVANCE FORM (Attachment I)

Unit/Center [redacted]

Name Shane A. Lonix

ADC# [redacted] Brks # iso3-74 Job Assignment iso Ag-seg

FOR OFFICE USE ONLY	
GRV. #	[redacted] m24-00424
Date Received:	2-29-24
GRV. Code #:	600

2-23-24 (Date) STEP ONE: Informal Resolution

2-29-24 (Date) STEP TWO: Formal Grievance (All complaints/concerns should first be handled informally.)

If the issue was not resolved during Step One, state why: This is an emergency, that excessive force

3-6-24 (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 serious nature). If you marked yes, give this completed form to the designated problem-solving staff, who will sign the attached emergency receipt. In an Emergency, state why: I don't deserve a wrongful decision from a human being when a

cause the use of excessive force, retaliation, failure to protect, cruel punishment. 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): I Need this grievance returned in order for me to complete my step by step process. 3 grievances was NOT returned by ADC staff, on 2-15-24 between 7:PM-1:AM...

push the hallway by Cpt. Lane thinking my limbs could tolerate such inflicted painful tasks, as he lifted my leg an hand restraints, while I were still attached, he ordered to other ADC staff to drop me... which I f... camera of Max... and into hallway in front of Max administrations office. there is No camera in iso3-74 cell which concerned me because I'm the only one left to protect my well-being. I can not tolerate such violent harm an denied of this medical Requests. I've requested to view medical jacket on 1-29-24, practitioner kirstan has denied any medical treatments I might deserve.

Inmate Signature [Signature]

Date 2-23-24

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 2-23-24 (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:

Sgt. Archie [redacted] Sgt. Archie [redacted] Date 2-23-24

Describe action taken to resolve complaint, including dates: per policy, one issue per grievance.

Please follow the sick-call process if you are having medical complaints. You were last seen by a provider regarding two issues on 1/24/24. - attachment 2/26/24

Staff Signature & Date Returned [Signature] 2/28/24 Inmate Signature & Date Received [Signature] 2-28-24

This form was received on 2-29-24 (date), pursuant to Step Two. Is it an Emergency? (Yes or No).

Staff Who Received Step Two Grievance: Sgt. Archie Date: 2-29-24

Action Taken: Not Resolved (Forwarded to Grievance Officer/Warden/Other) Date: 2-29-24

If forwarded to [redacted] of person receiving this form: Date:

DISTRIBUTION: Deputy Director of Health & Correctional Programs; BLUE - Grievance Officer; ORIGINAL - Given back to Inmate after Completion of Step One and Step Two.

Exhibit #1  
(B)

motion

Attachment VI  
00

DEPUTY/ASSISTANT DIRECTOR'S DECISION

**INMATE NAME:** Lonix, Shane A.

**ADC #:** [REDACTED]

**GRIEVANCE#:** EAM24-00424

**CHIEF DEPUTY/DEPUTY/ASSISTANT DIRECTOR'S DECISION:**

On February 23, 2024, you grieved "I need this grievance returned in order for me to complete my Step by Step process. 3 grievance was not returned by ADC [REDACTED] Staff. On 2-15-24 between 9:pm-1:am..I'm requesting to be medically examined by [REDACTED] [REDACTED] Simply because on 2-15-24 I were forced through the hallway by Cpt. Lane thinking my limbs could tolerate such inflicted painful tasks. As he lifted my leg an hand restraints, while I were still attached, he ordered to other ADC staff to drop mewhich I fe [REDACTED] As seen on ADC video cameras of Max 822 and into hallway in front of max administrations office. There is no camera in 150374 cell which concerned me because I'm the only one left to protect my well-being. I can not tolerate such violent harm and denied of this medical requests? I've requested to view medical jacket on 1-29-24, practioner Kirstan has denied my medical treatments I might deserve."

[REDACTED]

A [REDACTED] the  
r [REDACTED]  
b [REDACTED] en  
i [REDACTED]  
v [REDACTED] as  
a [REDACTED]  
i [REDACTED]  
y [REDACTED]  
r [REDACTED] d  
z [REDACTED] es,  
c [REDACTED] ity,  
a [REDACTED]  
c [REDACTED]  
N [REDACTED]

You have been seen for your complaints and treated as deemed appropriate and clinically indicated based upon your provider's medical judgment; therefore, this appeal is without merit.

DIRECTOR

*Andrea Cufelager* 4/1/2024

Please be advised that if you appeal this decision to the U.S. District Court, a copy of this Chief Deputy/Deputy/Assistant Director's Decision must be attached to any petition or complaint or the Court may dismiss your case without notice. You may also be subject to paying filing fees pursuant to the Prison Litigation Act of 1995.

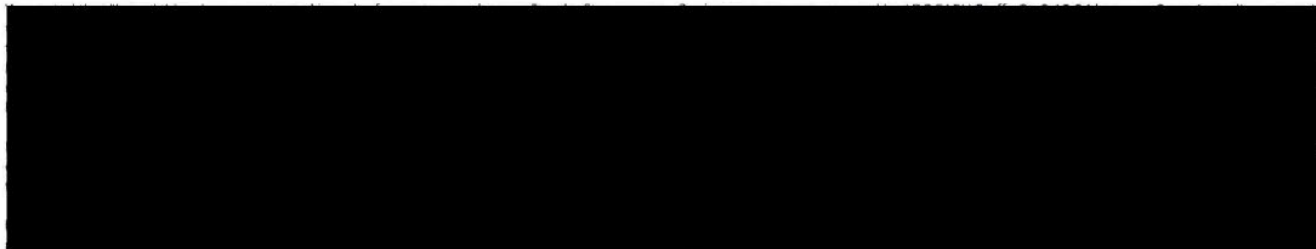
LONIX, SHANE A. PID#: [REDACTED]

Exhibit # 1 motion  
B

HEALTH SERVICES RESPONSE TO UNIT LEVEL GRIEVANCE

INMATE NAME: Lonix, Shane A.    ADC #: [REDACTED]    GRIEVANCE #: M24-00424

641 Your Grievance dated 2-23-2024, has been received and reviewed as well as your medical record to determine if medically necessary health care, as determined by your health care providers, has been provided to you.



Your grievance is without merit.

SIGNATURE OF HEALTH SERVICES  
ADMINISTRATOR/MENTAL HEALTH SUPERVISOR OR  
DESIGNEE

*Jason Palmer*



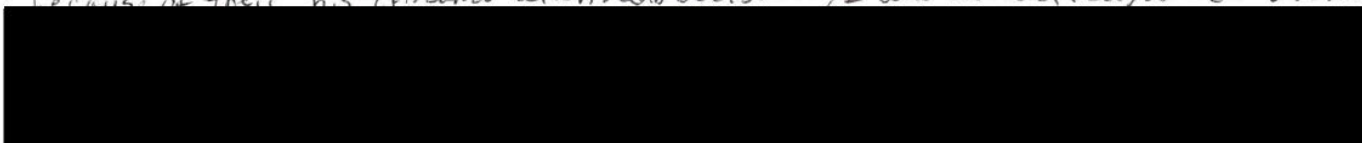
JASON PALMER, MEDICAL SVCS MANAGER  
MAR 1, 2024 15:47:18 CST

INMATE'S APPEAL

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 Deputy Director for Health & Correctional Programs 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 were 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 RESPONSE GIVEN ABOVE?

*an emergency consist of protocols without  
3.00 sick calls due to the failure of ADC staffs protection...the  
because of their "his" protocols actions and decisions, I was assaulted, which violat*



*Shane Lonix 3-6-24*

If appealing, please submit both the Unit Level Grievance Form (Attachment I) and the Health Services Response (Attachment IV)

Received

MAR 18 2024

Deputy Director  
Health & Correctional Programs

*123 3-24*

Grievance Administration  
Central office  
6814 Princeton Pike  
Pine Bluff, AR. 71602

~~1503-74~~

Truck mas)

1-3

Notice of motion to add into Evidence

Exhibit 1  
C

**UNIT LEVEL GRIEVANCE FORM (Attachment I)**

Unit/Center \_\_\_\_\_

Name \_\_\_\_\_

ADC# \_\_\_\_\_ Brks # \_\_\_\_\_ Job Assignment \_\_\_\_\_

FOR OFFICE USE ONLY	
GRV. # _____	
Date Received: _____	
GRV. Code #: _____	

\_\_\_\_\_ (Date) STEP ONE: Informal Resolution

\_\_\_\_\_ (Date) STEP TWO: Formal Grievance (All complaints/concerns should first be handled informally.)  
If the issue was not resolved during Step One, state why: \_\_\_\_\_

\_\_\_\_\_, (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 serious nature). If you marked yes, give this completed form to the designated problem-solving staff, who will sign the attached emergency receipt. In 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):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inmate Signature \_\_\_\_\_ 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 3.22.24 (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 \_\_\_\_\_

Ed Hester PRINT STAFF NAME (PROBLEM SOLVER) [REDACTED] ID Number Ed Hester Staff Signature 3.22.24 Date Received

Describe action taken to resolve complaint, including **dates**: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Staff Signature & Date Returned \_\_\_\_\_ 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: \_\_\_\_\_

**DISTRIBUTION: YELLOW & PINK** - Inmate Receipts; **BLUE** - Grievance Officer; **ORIGINAL** - Given back to Inmate after Completion of Step One and Step Two.

Exhibit # One - (D)  
#1

(74)

ISU  
3-74

# RETURN NOTICE

██████████ Inmate Grievance

Date: 3/1/24

Inmate Name: Lonix, Shane ADC#: ██████████

**WE ARE RETURNING YOUR GRIEVANCE FOR THE REASON(S) BELOW.....**

### Per AD 19-34:

- Please allow staff the opportunity to resolve your issue. The designated problem-solver 3 working days to contact the inmate and attempt resolution of the complaint. If after 3 working days the problem-solver fails to return step one, you may proceed to step two.
- Please present your unit level grievance form to the designated problem solver. Make sure you fill in the date beside step 1. The problem solver or staff member will sign/ date the form and the inmate will keep the yellow and pink copies as receipts.
- In order to proceed to the formal grievance process (step two), please complete the date beside "step two" and state why you consider step one unresolved and resubmit your grievance for processing.
- An inmate is required to submit a legible copy of the unit level grievance form. Your grievance is not legible/ readable. In the future we suggest you press down firmly when you write on the white copy to make sure the information is transferred to the pink, yellow, & blue copies.
- We no longer take grievance with your initial and last name it must be your full name as in eOMIS. Please fix your name and send it back and it will be processed.

Debra M. [Signature]  
Grievance Office









Exhibit - One  
#1 (H)

To: LONIX, SHANE A.  
ADC#: [REDACTED] Barracks: East/N2  
Received: 8/2/2023  
Date: 8/2/2023



Please be advised, your grievance has been received by the [REDACTED] Grievance Office. However, your grievance is being returned to you, due to the form being illegible. Therefore, you need to resubmit another copy, the original completed form, or a new completed form.

Once you complete the process, you may resubmit it.

Any further questions you have pertaining to the grievance office will be answered upon request for interview submitted to the grievance office.

**Note: Please do not trace over this copy in ink. The form must be legible in its original state.**

X *Ashley King*

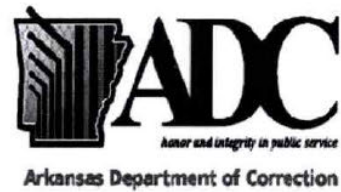
Ashley King  
Inmate Grievance Coordinator

These 2 copies of grievances can't be processed because the original copies has be destroyed by ADC Cummins unit staff. is this treatment acceptable to you?

Truck mail  
step 3 central office  
6814 Princeton pike  
Pine Bluff, AR. 71602

EXHIBIT #1 (I)

To: LONIX, SHANE A.  
ADC#: [REDACTED] Barracks: East/N2  
Received: 7/27/2023  
Date: 7/27/2023



Please be advised, your grievance has been received by the [REDACTED] Grievance Office. However, your grievance is being returned to you, due to the form being altered. Therefore, you need to resubmit a new completed form.

Any further questions you have pertaining to the grievance office will be answered upon request for interview submitted to the grievance office.

**Note: The grievance office has been advised not to accept copies that have been traced or altered. They must be legible in their original state.**

X Ashley King  
Ashley King  
Inmate Grievance Coordinator

Exhibit #2  
A

*Lomix, Shane*



**ISOLATION**

**KEEP BAG**

*Iso.  
3-74*

**HYGIENE ITEMS 2X**

**UNDERSHORTS 2X**

**SOCKS 2X**

**TOWELS 2X**

**SHOWER SHOES**

**ADDRESS BOOK**

**ENEVELOPES 10X**

**LEGAL PAD**

**FLEX PEN**

**LEGAL MAIL ONLY IF CASE OPEN**

**RELIGIOUS MATERIAL**

**LAUNDRY BAG**

*Received 2-27-24 9:AM*

Exhibit #2

Any changes  
to be made to this list

Max Commissary Price List UPDATED 2/1/24		CANDY	BEVERAGES	HEALTH & HYGIENE **INDIGENT**
CRACKERS	0.44	Skittles Tropical/wild berry	1.72 Keefee hot cocoa	2.18 Speed Stick Wet*
Arstlin cheese cracker	0.44	Choc covered mini caramels	1.95 keefee coffee	4.81 power-up force/drive dry
alstin toast and PB	3.17	reeses peanut buutter cups	2.3 bc coffee	2.49 power up drive wet*
Cheese Crackers	3.17	hershey	1.58 flavor fix	2.41 Soap-Moist, cocoa, sport*
harvest wheat crackers	2.81	Chick o stick	1.95 hot cocoa sugar free singles	0.75 Dial*
salinas (tube)	0.62	snickers	1.71 dry milk	6.75 colgate*
Graham Crackers	3.3	three muskateer	1.66 Hometown Decaf Coffee	3.01 coolwave toothpaste*
Cheese-It 1.5	0.63	M&M w/ peanuts	1.58 creamer	0.86 toothbrush*
snack crackers	3.75	Peanut Clusters	2.06 tasters choice single stick coffee	0.25 Floss Loops *
Cookie	1.05	Double Dipped	2.86 clear lip balm*	2.53 hells*
lead oatmeal/choco chip	0.89	peppermint discs	0.92 Vanilla /Choc health shakes	hydro cream*
P.E. lemon	0.89	rootbeer barrels	1.44 CAKES & PASTRIES	1.17 baby powder*
choco, duplex, strawberry	1.58	Werthers	1.99 Danish-straw/blueberry	2.96 foot powder*
butter cookies	1.85	peppermint stick	0.22 LD-zebra cake/rolls, Honey buns	2.96 Tums *
Buds Choc pb	1.97	werthers sugar free	1.88 Fudge rounds, oatmeal cream,	2.96 Antifungal cream*
Buds pb graham	0.83	MUTS & GRAINS	PB crunch bars, snickerdoodle	comb*
oreo	2.14	salted peanuts	0.64 strawberry swiss roll	1.71 soap dish *
vanilla wafers	2.81	Sweet and spicy mix	0.87 Lemon loaf cake	1.85 Shampoo/conditioner*
CHIPS/BREAD	0.56	oat & honey crunchy granola single	0.44 Creamy Curl Honey bun	1.08 lotion*
Wheat bread	0.61	Choc pb protein bar	1.07 cream cheese pound cake	1.76 bananas
na cho tortilla-hot corn chip	0.93	Oat and honey granola Box	3.16 Toastem-cherry, fudge, wildberry,	1.76 palm brush
stuffed jalapeno, Blue Cheese	1.07	fudge cocnut granola box	0.91 Meats and mics. Foods	shave cream
Ch eetoes	2.89	Choc trail mix 3.0 oz	2.24 beef stew	2.77 hells*
Lobo tortilla	0.83	Cashevs 3.25oz	0.98 vienna sausages reg/hot	1.96 royal crown*
caramel swirl pretzels 5 oz	0.83	sirirach peanuts 3.5 oz	0.98 chili no beans	2.64 BATTERIES **INDIGENT**
Doritos	0.95	Crunch n munch 3.5 oz	2.07 Chili with beans HOT OR REG	2.35 AA ION **
CONDIMENTS	1.25	ranch corn nuts	1.75 Sardines h/s OR Reg.	1.19 AA Energizer **
cheese spread spicy/reg	1.21	precooked rice	0.65 hot and spicy pepperoni	3.17 AAA **
vel. Cheese pouch (powder)	2.71	raw almonds 3.25oz	1.66 lasangna	1.78 earbuds
picante sauce	0.81	cheesy rice	0.91 hot cajun beef/turkey sausage	2.71 Clear tunes radio**
jelly- strawberry/grape	3.61	oatmeal 10 pack	3.23 Beef summer sausage	2.67 MISC. ITEMS
ketchup	0.64	oats & honey granola	3.35 Refried Beans	2.1 reading glasses
mayo	4.49	double dip granola	3.35 Tuna	1.81 shower shoes
mustard	2.58	PB Choco Chip granola	3.35 tuna Chipotle	2.05 address book
peanutbutter	1.33	single bar granola	0.67 Fishsteaks H/S or Mustard	1.64 spoon
Sugar twin	1.88	protein bar	1.06 Chicken Chunks	4.44 mirror
red salsa	0.61	STATIONARY **INDIGENT**	Spam	2.09 T-shirt med-4XL
ranch	0.51	legal envelope **	0.76 potato loaded, 4 cheese, garlic	tooth brush cap
bbq sauce	0.51	legal pad **	0.41 PICKLE-Mild, Garlic, Hot	1.28 mug
SOUPS	0.51	flex pen **	1.58 oysters	2.81 crew socks
low sodium chicken, chili	0.51		0.46 beef/turkey snack stick	1.01 Shredded beef
lime chili shrimp, hot veggie	0.51		jack mack	2.78 beef & cheese stick
roast beef, creamy chicken	0.51		Cheese block SHARP or HOT	2.06 san miguel refried beans(poucd
picante chicken	0.36		cajun rice w/ ckn & saus	3.42 cornflake chewy w/pb
New select Hot veggie, chili				

The best is active brain food.  
My head is sending signals to my brain to release chemicals.

**\*\*ALL INFO MUST BE LEGIBLE OR YOUR LIST WILL BE THROWN OUT\*\***

**NAME, ADC #, HOUSING AREA, DATE, ITEMS and QUANTITY\*\*\*\*\***

**LIST ITEMS IN THE ORDER YOU WANT THEM SHOPPED\*\*LIST SUBS WANTED**

**\*\*Indigent items in Gray**

**\*\*ADD YOUR PHONE TRANSFERS IN YOUR LIST ON THE LINES**

**IT CAN BE MISSED IF YOU WRITE IT IN A RANDOM AREA ON THE SLIP**

**\*\*YOUR SLIP IS DUE at 5:30 a.m. on the morning of your shopping day, night shift will pick up\*\***

**\*if you fail to have your slip ready, we will NOT accept your list while delivering/orders will NOT be brought back\*\***

**\*\*PRICES ARE SUBJECT TO CHANGE W/O NOTICE\*\***

*grievance procedure policy states I can make scribble of markings on the grievance on yellow & pink paper. which requires me to either re-write grievance or trace grievance. I'm having trouble understanding? 12-6-23 grievance signed by Sgt. Jackson, 12-10-23 grievance signed by Sgt. Johnson  
Sgt Archie 2-23-24, & 1-29-24 signed by Cpt Lane of All grievances Not being returned for my step-by-step process? ) & yellow an pink copies aren't eligible to read, their sent back to me denying my step 2 process? Grievance Coordinators? ADC, this is illegal activity! what can I legally do? violations against Wellpath incorporations also? because employees fail to return my Step 1 processed grievance? this is violation of your own AD 19-34 code because I do not have the Skill or power to perform this task of pressing my pen hard enough, which breaks my .46 & flex pen. or least ADC can provide stronger equipments?*

Exhibit # 2  
(E)

REQUEST FOR INTERVIEW

UNIT [REDACTED]

DATE: 9-26-23

TO: Warden Pierce OFFICE: Classification

FROM: Shane Lonix (Inmate's Name) NUMBER: [REDACTED] BKS: North 2

JOB ASSIGNMENT: isolation SUPERVISOR: EB

WORKING HOURS: TO:

GIVE A DETAILED REASON FOR INTERVIEW: I want to add inmate "Handy" AKA Scruge, to my enemy alert list. Thanks!

I do not add inmates to enemy alert list without justification. M. Lopez 9/26/2023

RECEIVED CUMMINS UNIT

SEP 26 2023

ASST WARDEN SECURITY

Shane Lonix (Inmate's Signature)



*Janet, J*  
*145316*  
*EB/wor*

J.74

Exhibit 5 - (A)

ISSR100

Arkansas Department of Corrections

MAJOR DISCIPLINARY

If the C.S.O. determines that the violation(s) described on this document are felonious; he/she must hand carry this document to the Unit Warden who must immediately notify the Director.

Inmate: Lonix, Shane Ashton

ADC#: [REDACTED]

Assignment: AM:Ext Restrictive Housing  
PM:Direct Threat (Others/Safe/Secure Operations)

Class: IV is being charged by Wofford, Zoe M with code violation(s):

Title: Corporal

- 02-17 Creating unnecessary noise, including disruptive OR aggressive play in areas other than designated recreation areas.
- 04-4 Battery on Staff. Use of physical force upon staff (examples include, but are not limited to, staff, volunteers, vendors and/or contractors).
- 11-1 Insolence to a staff member.
- 12-4 Refusing a direct verbal order to leave or enter any area of the institution or ADC property including, but not limited to, a cell, barracks, chow hall, transportation vehicle, hallway, or work site.

Date & Time: 02/15/2024 10:15 PM

Notice of Charges:

Incident Report Unit: [REDACTED]  
 Incident Report Date/Time: 02/15/2024/10:15:00 PM  
 Incident Report Number: 2024-02-100  
 Incident Report Comments By: Zoe M Wofford

On 2/15/24 at approx. 10:15pm, I (Cpl. Z. Wofford) was conducting shower call in Max 8. I approached Max 8, cell 22, which houses Inmate Shane Lonix # [REDACTED]. At this time, Inmate S. Lonix was placed in hand restraints and his cell door was opened. As Inmate S. Lonix exited his cell, he refused to allow the leg restraints to be applied. Inmate S. Lonix became combative by bumping me with his shoulder and then pulling away from me and stated in a loud and aggressive tone of voice, "I do not want a female officer touching me, so get your hands off of me bitch". I gave Inmate S. Lonix a direct order to stop his action and to step back into his cell but to no avail. Inmate S. Lonix then kicked me in the stomach. I then instantly reacted by striking Inmate S. Lonix in his upper back. All rovers were called, and additional staff arrived and Inmate S. Lonix was removed from Max 8. Inmate S. Lonix knows that his actions are against A.D.C. and Unit Policies. Therefore, I am charging this inmate, Shane Lonix [REDACTED] with the following rule violations: 2-17, 4-4, 11-1 and 12-4 pending D.C.R. End of statement.

(I affirm that the information in this report is true to the best of my knowledge)

Signature of Charging Officer

NOTIFICATION:	Officer <u>Placido</u>	Date & Time Notified <u>2-20-24</u>
---------------	------------------------	-------------------------------------

Witness Statements: No X If yes, list:

[REDACTED]

Inmate's Signature

C.S.O. Review: Outcome: Refer to Hearing Officer/Comm.  
 By: Taylor, Scott A Date 02/20/2024

Extension: No X Yes \_\_\_\_\_ Has extension form been completed? \_\_\_\_\_

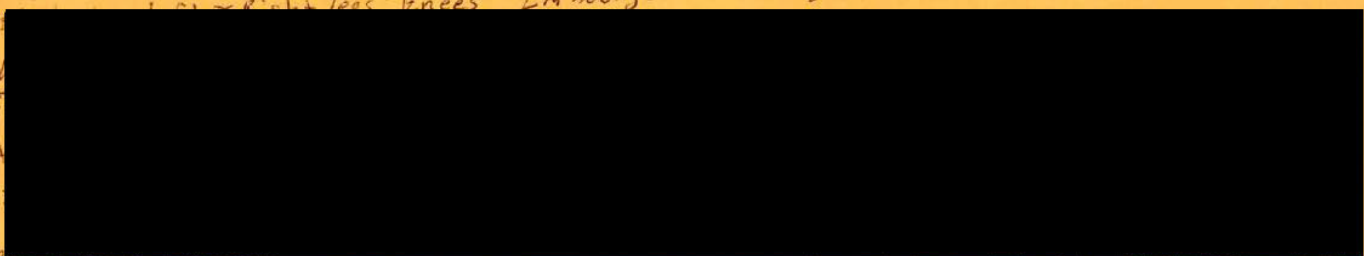
Presentation by Counsel - Substitute is required when it is determined that the inmate is illiterate or incompetent or that the issues are extraordinarily complex.  
 Counsel-Substitute: Assigned (Name) \_\_\_\_\_ Not Assigned \_\_\_\_\_

Governor: Sarah Sanders - 2-21-24  
 ov. I was handcuffs an shackles as ADC [REDACTED] staff cpt. Lane grabbed an lifted my leg restraints into the air, ordering  
 that other staff drop me, which injured my left sholder an Neck. Also slammed left arm to gate an pushed my back as m  
 head hit the wall on 2-15-24, 9:30pm-1:00am video footages. Im requesting to finish my life sentence at malvern in  
 michita river? Ive been there before, NO problems occurred. Ive requested by grievance for [REDACTED]  
 DE has denied since 2019... I Need fair treatment somewhere. Governor, I can barely walk without for long perio  
 f time and my [REDACTED] - Can you innervein in any-way possible?  
 y only means to function with my strength is by writting my problems to people who are able to complete their  
 assigned Outy.

Appeal - 2-21-24

Retaliation should not be tolerated by this [redacted] ADC... I was roughly handled, strongly abused, and  
 irriably treated by Co-wofford and Cpt. Lane. As of threatened, pushed in the back down the steps, jerking  
 left arm, dragged - tossed - and carried by restraints, pushed into wall, and most of all swept by the threshold  
 ankle restraints while Cpt. Lane gave the order to drop me! Co-wofford suffered No injuries, No bruises  
 scratches, or violent physical harm... in which I've suffered [redacted] and wrongful actions of  
 meone I didn't or weren't opposing any threat towards... A 26.00 book was denied of mine, 3 grievances  
 creht returned to me, No proper mattress-pillow had been given to me, my daughters birthday was 1 day  
 prior to 2-15-24, and on 2-15-24 was my deceased fathers birthday which after 30 people showered - Co-  
 wofford didn't request to None of them to shake their ~~own~~ own towel down, but told me to shake  
 myself down. The prior week Co-wofford didn't pass me any paperwork after she an another CO- passed  
 paperwork to the whole 8 barracks except me. Co-white had full control of any forceful motion I  
 tied to fester up because he understood there wasn't too much I could have done once placed in  
 handcuffs... Co-wofford had plenty of opportunities to separate herself from my distances reach  
 & chose to agitate the situation, childishly. point is, she got mad because I wasn't sexually  
 attracted to her when I stated for her to let go of my arm. I prefer males to escort me. It  
 ems we have a huge problem because now, I don't feel comfortable having any clothes off while  
 any female is present. Sgt. Jackson kept this cool because he too ~~don't~~ knew that once my  
 hands were cuffed, a person would have a difficult time to cause any harm towards another.  
 there was No Need for retaliation abuse! I was only found guilty of one charge, which I  
 suffered more than the accuser.

Recall #2, 2-23-24  
 re to staff assaulting me, I'm deprived of my sleep because of the [redacted]  
 "knees" I'm having trouble creating enough pressure to control my limbs?



To avoid all future problems or troubles for me, I should be entitled to toothpaste, toothbrush  
 towel, etc. when off of behavior control? And when off of punitive I should be entitled to a New  
 mattress an pillow? I Also request that I be housed in a single-man cell with a camera for  
 my safety? why am I being deprived of all these grievable issues, which my grievances  
 wasn't been getting returned?

Grievance step 1 2-23-24 by Sgt. Archie

Need this grievance returned in order for me to complete my step by step process. 3 grievances was not returned  
 ADC [redacted] staff. on 2-15-24 between 9:pm-1:Am, I'm requesting to be medically examined by MRI machine for  
 [redacted] simply because on 2-15-24 I were forced through the hallway by  
 Cpt. Lane thinking my limbs could tolerate such inflicted painful tasks. as he lifted my leg an hand restraints while I  
 was still attached, he ordered to other ADC staff to drop me. which I fell upon my [redacted]  
 holding cell cage of [redacted] to the wall. As seen on ADC video cameras of max bed and into hallway  
 front of max administrations office. There is No camera in iso 3-24 cell which concerned me because I'm the  
 only one left to protect my well-being. I can not tolerate such violent harm an denied of this medical Requests  
 I requested to view medical jacket on 1-29-24, practitioner Kirstan has denied any medical treatments I might deserve

*June Jones*

Exhibit # 03  
(B)

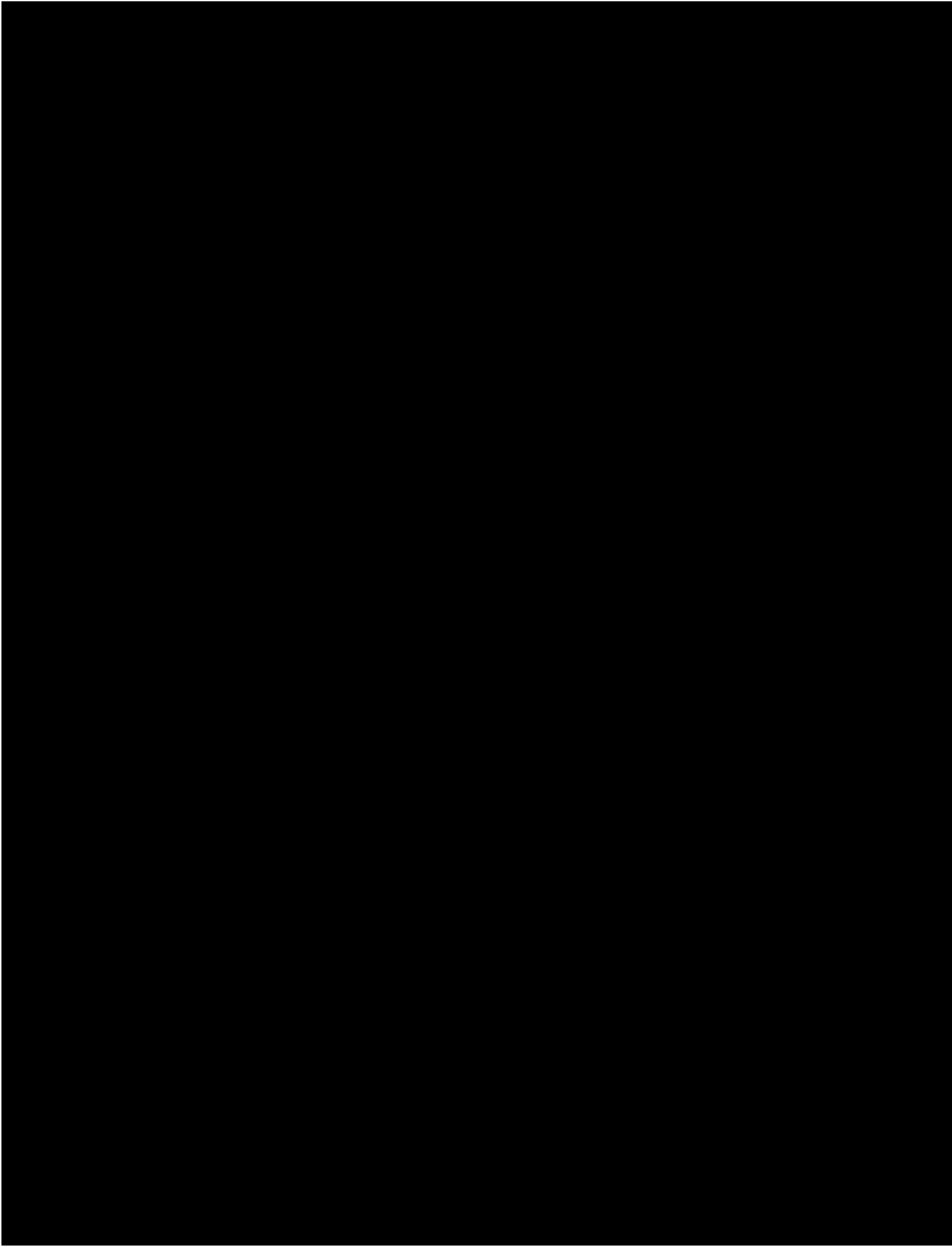
Grievance: I need this grievance returned in order for me to complete my step by step process.  
step 1 - 2-23-24 3 grievance was not returned by KDC [redacted] staff. On 2-15-24 between  
y Sgt. Archie [redacted]



Inmate Request: warden - to avoid all future problems or troubles for me, I should be  
from 2-21-24 entitled to toothpaste, toothbrush, towel, etc. when off of behavior control  
And when off of punitive I should be entitled to a new mattress and pillow  
I also request that I be housed in a single-man cell with a camera for  
my safety? Why am I being deprived of all these grievable issues,  
which my grievances hasn't been getting returned? "No response"!

Sickcall # [redacted]  
2-21-24 [redacted]

Seen - 2-26-24 escorted by Cpt. Taylor Afternoon Time - Nurse



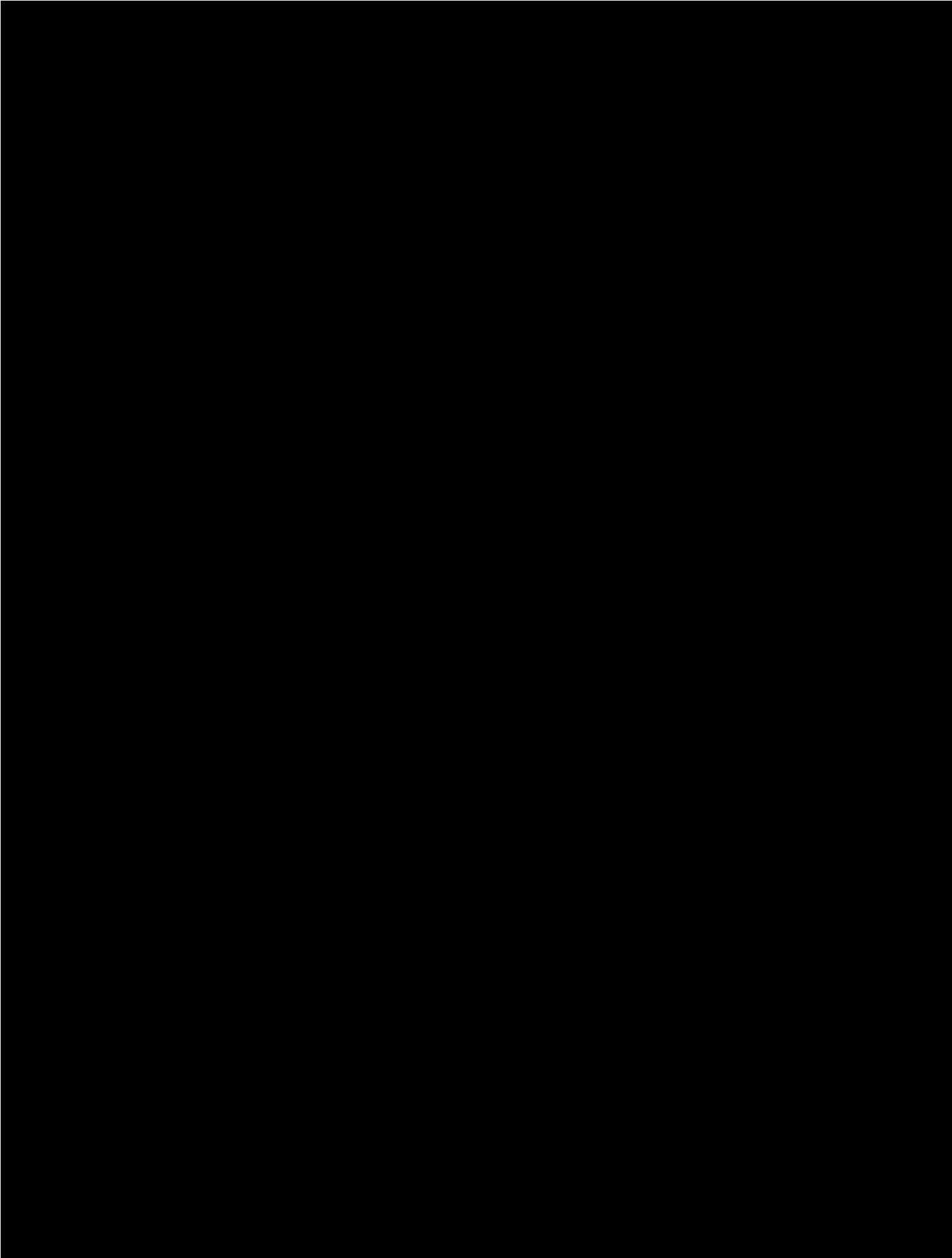


Exhibit # 03

E

Appeal :  
-21-24

Retaliation should Not be tolerated by this [REDACTED] DC... I was roughly handled, strongly abused, and horribly treated by CO-wofford and Cpt. Lane As of threatened, pushed in the back down the steps, jerking of left arm, dragged-tugged- and carried by restraints, pushed into wall, and most of all swept by the threshold of ankle restraints while Cpt. Lane gave the order to drop me! CO-wofford suffered No injuries, NO bruises, scratches, or violent physical harm... in which I've suffered, [REDACTED] wrongful actions of someone I didn't or weren't opposing any threat towards. A 26.00 book was denied of mine, 3 grievances weren't returned to me, No proper mattress-pillow had been given to me, my daughters birthday was 1 day prior to 2-15-24 and on 2-15-24 was my deceased fathers birthday which after 30 people showered CO-wofford didn't request to none of them to shake their own towel down, but told me too shake myself down. The prior week CO-wofford didn't pass me any paperwork after she an another CO-passe out paperwork to the whole 8 barracks except me. Co-white had full control of any forceful motion I tried to fester up because he understood there wasn't too much I could have done once placed in handcuffs. Co-wofford had plenty of opportunities to separate herself from my distances reach but chose to adjutate the situation, childishly. Point is, she got mad because I wasn't sexually attracted to her when I stated for her to let go of my arm. I prefer males to escort me. It seems we have a huge problem because now, I don't feel comfortable having any clothes off while any female is present. Sgt. Jackson kept his cool because he too knew that once my hands were cuffed a person would have a difficult time to cause any harm towards another. there was NO need for retaliation abuse! I was only found guilty of one charge, which I suffered more than the accuser.

190/74 Exhibit # 03 (E) (74)

F-831-4 Major Disciplinary Appeal Form

Kerey

Inmate Name [redacted] ADC# [redacted]
Unit/Center [redacted] Punitive Isolation Yes No
Disciplinary (date) 2-9 by (charging officer) [redacted]

Appealed to Warden/Center Supervisor: Note, if you do not agree with the decision of the Disciplinary Hearing Officer, you have 15 business days from receipt of disciplinary action to appeal to the Warden/Center Supervisor.
Warden's Decision: Affirm Reverse Modify (See attached if modified)
Signature: Sgt. [redacted] Jackson Date 2/28/24

Appealed to Disciplinary Hearing Administrator: Note, if you do not agree with the response of the Warden/Center Supervisor, you may appeal within 15 business days from receipt of the Warden/Center Supervisor's response to the Disciplinary Hearing Administrator.
DHA's Decision: Affirm Reverse Modify (See attached if modified)
Signature: Date

Appealed to Director: Note if you do not agree with the Disciplinary Hearing Administrator's response, you may appeal within 15 business days from receipt of the Disciplinary Hearing Administrator's decision to the Director.
Director's Decision: Affirm Reverse Modify (See attached if modified)
Signature: Date

Notice to Inmate: This form is to be used for all appeal levels and responses. Briefly state reasons why conviction or punishment should be reversed or modified. This information will be considered at all three levels of appeal. Only information that is contained within this space on this form will be considered:

[Handwritten text in the appeal space, including phrases like 'I am not responsible for any forceful...', 'I prefer to be in the cell...', 'I am not responsible for any forceful...']

Inmate's Signature: [redacted] Date: [redacted]

Original to be submitted for appeal; copies for inmate's use to proceed to next level if timely response not received.

Exhibit # S-E  
NOTICE of motion



Arkansas Department of Correction

4-24

**MAJOR DISCIPLINARY APPEAL RESPONSE**

[Redacted]

Inmate Name: Shane Lonix    ADC: [Redacted]    Bks: Iso/74

Disciplinary Date: 2/15/24    By: Charging Officer: Cpl. Wofford

**WARDEN/CENTER SUPERVISOR'S DECISION**

You were written a Major Disciplinary on 2/15/2024 by Cpl. Wofford and it's been reviewed. On 2/15/24 at approx.: 10:15pm Cpl. Wofford written (you) Inmate S. Lonix ADC [Redacted] for Creating unnecessary noise, insolence to a staff member, and battery use of force on staff. I find you have not presented any new evidence that would merit a reversal or modification of this disciplinary. This type of behavior will not be tolerated here at the [Redacted]; therefore, I am affirming your appeal that the Disciplinary Hearing Officer's decision will be upheld. End of statement.

If you disagree with my decision you may appeal to the Hearing Administrator, at Central Office, within 15 days.

Moses Jackson

Supt

2/28/24

Signature of Warden/Designee

Title

Date

3-2-24

*[Handwritten signature]*

Track mail - Appeal form & decision  
 to Central office Administrator, please  
 6814 Princeton ~~Pike~~  
 Pine Bluff, AR. 71602

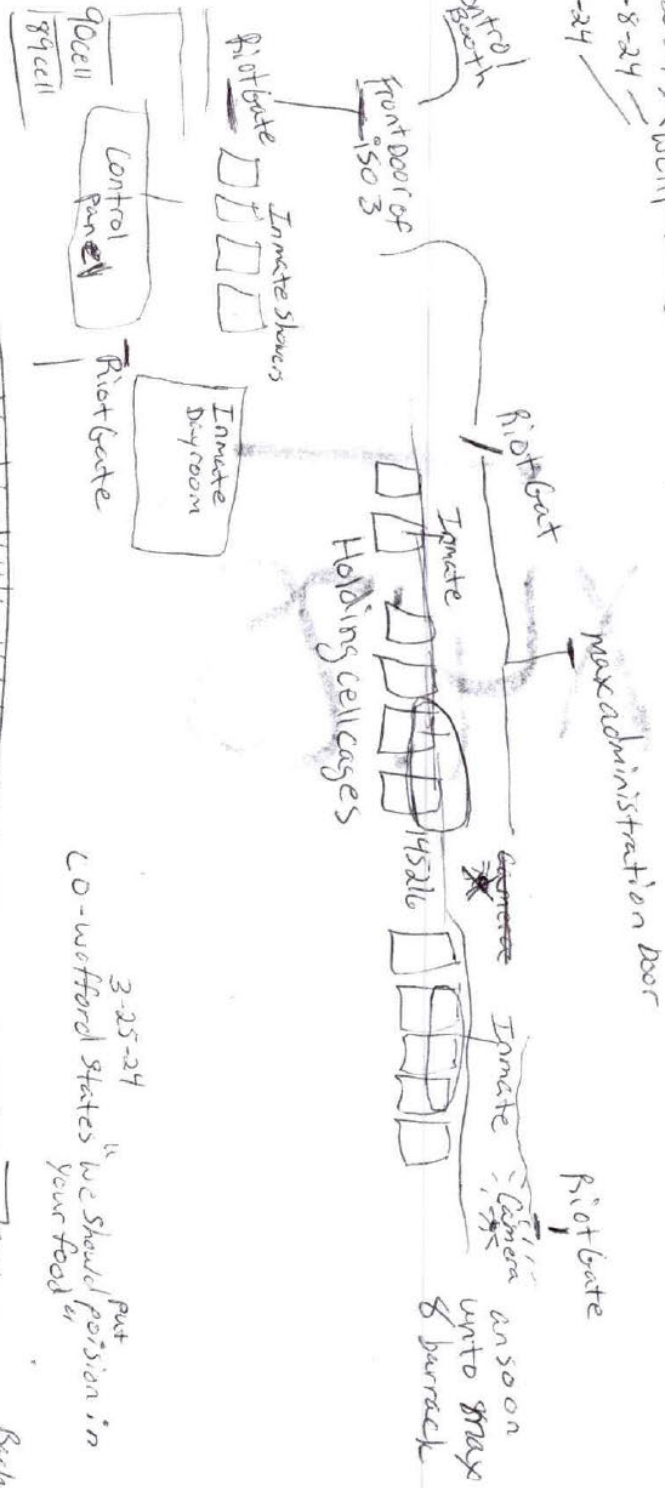
Exhibit # 4-A. - Diagram

All Addresses of [Redacted]

Witnesses

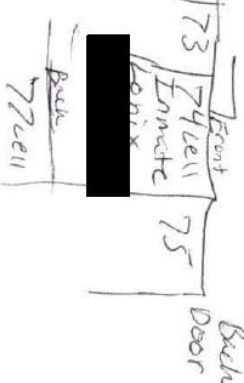
- CO-McWhite-2-15-24
- Sgt-Jackson-2-15-24
- Inmate-2-15-24
- Inmate-2-15-24
- Sgt. Nickens-3-22-24
- mental health Jones-4-2-24
- Practitioner Bennett MS.-3-8-24
- Practitioner McBirdstand-1-22-24
- Sgt. Gramm-1-24-24
- Sgt. Peacock-1-27-24
- CO-Hobbs-1-25-24
- CO-worford-2-25-24
- Female Captain-2-15-24
- Female Guard-2-15-24
- Major Taylor-3-1-24
- Warden Richardson-3-27-24
- Sgt. Sanders-1-3-24
- Sgt. King-4-3-24
- Video Camera-2-15-24

FRCP-26(a)(1)



CO-worford states "we should put in your food"

- 61
- 62
- 63
- 64
- 65
- 66
- 67
- 68
- 69
- 70
- 71
- 72
- 73
- 74 cell
- 75



Worford

Shane Fox

NAME S. Lonix  
ADC # [REDACTED]  
HOUSING [REDACTED]

X4:25

-476 Logan @90305

Motion

FRCP-33 Exhibits into Evidence #4-B. - Interrogatories

The Inmate Handbook Division of Correction 22<sup>nd</sup> printing, march 2020 (Revised) edition. Page 4 (Mission Statement - The mission of the ADC is to provide public safety by carrying out the mandates of the courts; provide a safe humane environment for staff and inmates; strengt the work ethic through teaching of Good habits; and provide opportunities fo Staff and inmates to improve spiritually, mentally, and physically.) ?

pg. 4 (Vision Statement - The vision of the ADC is to be an honorable and professional organization through ethical and innovative leadership at all levels, provide cost efficient, superior Correctional Services that return productive peop to the Community.) ?

pg. 5 Classification - medical classification ? what is procedure if I claim to be hurt ?

pg. 6 Work assignment - disciplinaries for refusing work ?

pg. 7 Living in a Prison Setting - Rebuilding of attitudes, values, work skills ?

pg. 8 Lights out - MP4 players can be purchased through commissary ?

pg. 9 Searches/shake Downs - what is protocol of a Normal Search/shake down ?

pg. 9. Property - 1. personal property & 2. State issued property ?

pg. 10 Enemy Alert Lists - A staff separation can be entered ?

pg. 10 Prison Rape Elimination Act - ?

pg. 11 Inmate Grievance Procedure - 15 days from the date of incident, 3 working days step 1, step 2, ?

pg. 13 personal clothing and page 24 - Restrictive Housing - ?

pg. 21 04-8, Battery - use of physical force upon an inmate ?

pg. 21 Assault Category PS-3 - to inflict injury ? Did Dept. have inflict injury on 2 ?

pg. 25 medical Services and the AR-833, health services Section 6 in J states - medical services shall have procedures for dealing with Special Needs Inmates, such as the aged, chronically ill, and those having severely limited perceptual or motor abilities ?

The page contains a grid of horizontal and vertical lines. There are 25 horizontal lines and 2 vertical lines. The vertical lines are located on the right side of the page, creating a narrow column. The horizontal lines span the width of the page, creating rows. The grid is empty.









**UNIT LEVEL GRIEVANCE FORM (Attachment I)**

Unit/Center \_\_\_\_\_

Name \_\_\_\_\_

ADC# \_\_\_\_\_ Brks # \_\_\_\_\_ Job Assignment \_\_\_\_\_

\_\_\_\_\_ (Date) STEP ONE: Informal Resolution

\_\_\_\_\_ (Date) STEP TWO: Formal Grievance (All complaints/concerns should first be handled informally.)  
If the issue was not resolved during Step One, state why: \_\_\_\_\_

\_\_\_\_\_, (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 serious nature). If you marked yes, give this completed form to the designated problem-solving staff, who will sign the attached emergency receipt. In 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):

\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_

Inmate Signature \_\_\_\_\_

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 \_\_\_\_\_ (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 \_\_\_\_\_

PRINT STAFF NAME (PROBLEM SOLVER) \_\_\_\_\_ ID Number \_\_\_\_\_ Staff Signature \_\_\_\_\_ Date Received \_\_\_\_\_

Describe action taken to resolve complaint, including **dates**: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Staff Signature & Date Returned \_\_\_\_\_

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: \_\_\_\_\_

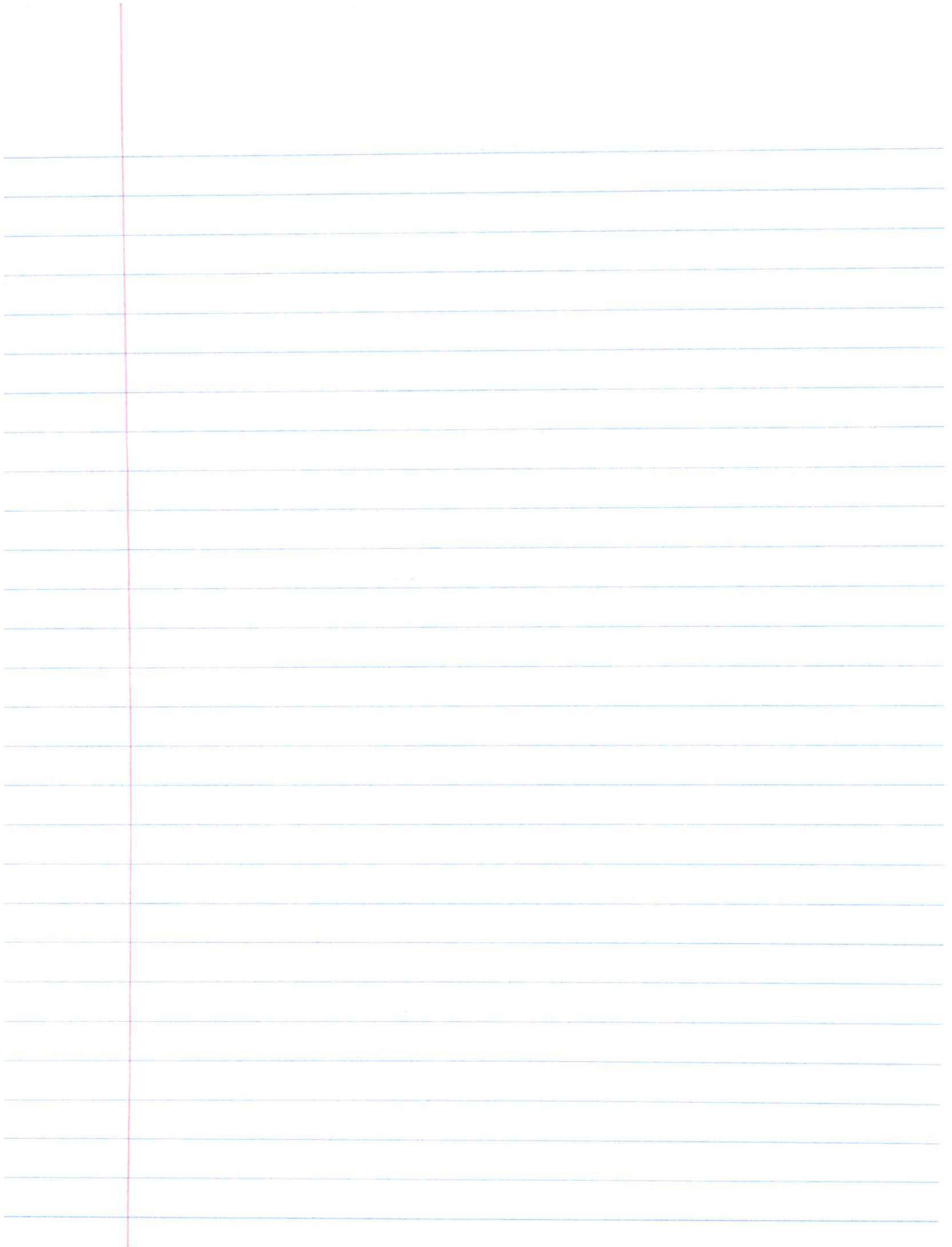
If forwarded, provide name of person receiving this form: \_\_\_\_\_ Date: \_\_\_\_\_

**DISTRIBUTION: YELLOW & PINK** - Inmate Receipts; **BLUE** - Grievance Officer; **ORIGINAL** - Given back to Inmate after Completion of Step One and Step Two.

Written opposition,  
~~Opening Statement~~ - ask that any motion from the <sup>Defendant</sup> Not be given

Just because you understand how a person can function under certain pressures, doesn't mean you really "know" that person. That person could hate or Love any notion of happy or horrible feelings and react differently or the same each time, but that doesn't mean that <sup>his/her</sup> ~~you~~ set vibe helps in the presence of that person. Prison has gone far enough holding inmates under stricked provisions. meaning, inmates don't recieve tax returns of Normal Spending in ADC, The funding we do provide to the ADC which are from: commissary, inmate counsel food, the tablet device for all sorts of funds - music, subscribers, phone calls, movies, games, and any other method of a means for living... all funds added to the ADC of that "person's" unit - "inmate". From 2017, I've witnessed inmates dying, and/or suicidal tendencies. I'm housed in a cell 425 at [REDACTED] that an inmate Quincy Allen recently committed suicide April 1<sup>st</sup> more or less inn. 4-20-24. What could these funds be used for from ADC, if Not "Scientific emissions, Construction projects, and/or material usages"?

Cpt. Lane may attend church every Sunday and pray and read the bible most times... but, this is the same person who was seen on video on 2-15-24, my dad's birthday, of harming me for No reason accept retaliation. in this case, I chose to cross examine every witness and complete an oral testimony. There is a such thing as evil people, bad people, and crazy people.. which should all be separated and punished at certain levels. Arkansas has/is providing the wrong type of treatment. I would like to prove 3 elements of: Retaliation, <sup>Breach of Fiduciary Duty</sup> ~~Use of excessive force~~, Cruel & unusual punishment, Negligence, and the failure to protect, elements? many inmates wants to vacate the [REDACTED] prison and Now I finally understand why... We drink brown water "Liquid", we watch Memphis TN News, and there's been illegal activity here every since I've been here. inmates choose to live in isolation b/c our property is safe, protected, and secure. Ask that any motion of the defendant Not be granted



**CERTIFICATE**

(Prisoner Accounts Only)

(To be Completed by the Institution of Incarceration)

I certify that the applicant named herein has the sum of \$ 0 on account to his/her credit at the [REDACTED] institution where he is confined.

I further certify that the applicant likewise has the following securities to his/her credit according to the records of said institution: [REDACTED]

I further certify that during the past six months the applicant's average balance was \$ 83.58.

3/20/24  
Date

Jerri Swiney  
Signature of Authorized Officer of Institution



**CALCULATION OF INITIAL PAYMENT OF FILING FEE**

(To be Completed by the Institution of Incarceration)

PLAINTIFF: Shane A. Lonix

ADC NUMBER: [REDACTED]

FEDERAL COURT CASE NUMBER (IF KNOWN): \_\_\_\_\_

Total deposits for last six (6) months: \$ 15-

Average monthly deposit (total deposits divided by 6): \$ 250

Total balances for last six (6) months: \$ 501.45

Average monthly balance: (Total balances divided by 6) \$ 83.58

Current account balance: \$ 0

Initial payment of filing fee as of 3.20.24: \$ 16.72

(The greater of the average monthly deposit  
Or the average monthly balance x .20)

DATE: 3.20.24 AUTHORIZED OFFICIAL Jerry Swiney

(NO FILING FEE SHALL BE IN EXCESS OF  
\$350.00 FOR A CIVIL LAWSUIT  
OR  
\$505.00 FOR AN APPEAL)



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS

APPLICATION TO PROCEED  
WITHOUT PREPAYMENT OF  
FEES AND AFFIDAVIT

Plaintiff  
  
v.  
  
Defendant

CASE NUMBER:

I, Shane A. Lonix declare that I am the (check appropriate box)

petitioner/plaintiff/movant  other

in the above-entitled proceeding; that in support of my request to proceed without prepayment of fees or costs under 28 USC §1915 I declare that I am unable to pay the costs of these proceedings and that I am entitled to the relief sought in the complaint/petition/motion.

In support of this application, I answer the following questions under penalty of perjury:

1. Are you currently incarcerated?  Yes  No (If "No," go to Part 2)

If "Yes," state the place of your incarceration [REDACTED]

Are you employed at the institution? NO Do you receive any payment from the institution? NO

Attach a ledger sheet from the institution(s) of your incarceration showing at least the past six months' transactions.

2. Are you currently employed?  Yes  No

a. If the answer is "Yes," state the amount of your take-home salary or wages and pay period and give the name and address of your employer.

b. If the answer is "No," state the date of your last employment, the amount of your take-home salary or wages and pay period and the name and address of your last employer. NA 15 years ago.

3. In the past 12 twelve months have you received any money from any of the following sources?

- a. Business, profession or other self-employment  Yes  No
- b. Rent payments, interest or dividends  Yes  No
- c. Pensions, annuities or life insurance payments  Yes  No
- d. Disability or worker's compensation payments  Yes  No
- e. Gifts or inheritances  Yes  No
- f. Any other sources  Yes  No

If the answer to any of the above is "Yes," describe, on the following page, each source of money and state the amount received and what you expect you will continue to receive. \$15.00 a year. \$12.00 a month by you only.

4. Do you have **any** cash or checking or savings accounts?  Yes  No

If "Yes," state the total amount. [REDACTED]

5. Do you own any real estate, stocks, bonds, securities, other financial instruments, automobiles or any other thing of value?  Yes  No

If "Yes," describe the property and state its value.

6. List the persons who are dependent on you for support, state your relationship to each person and indicate how much you contribute to their support. *NA*

I declare under penalty of perjury that the above information is true and correct.

3-15-24  
Date

*James J. J...*  
Signature of Applicant

NOTICE TO PRISONER: A Prisoner seeking to proceed IFP shall submit an affidavit stating all assets. In addition, a prisoner must attach a statement certified by the appropriate institutional officer showing all receipts, expenditures, and balances during the last six months in your institutional accounts. If you have multiple accounts, perhaps because you have been in multiple institutions, attach one certified statement of each account.

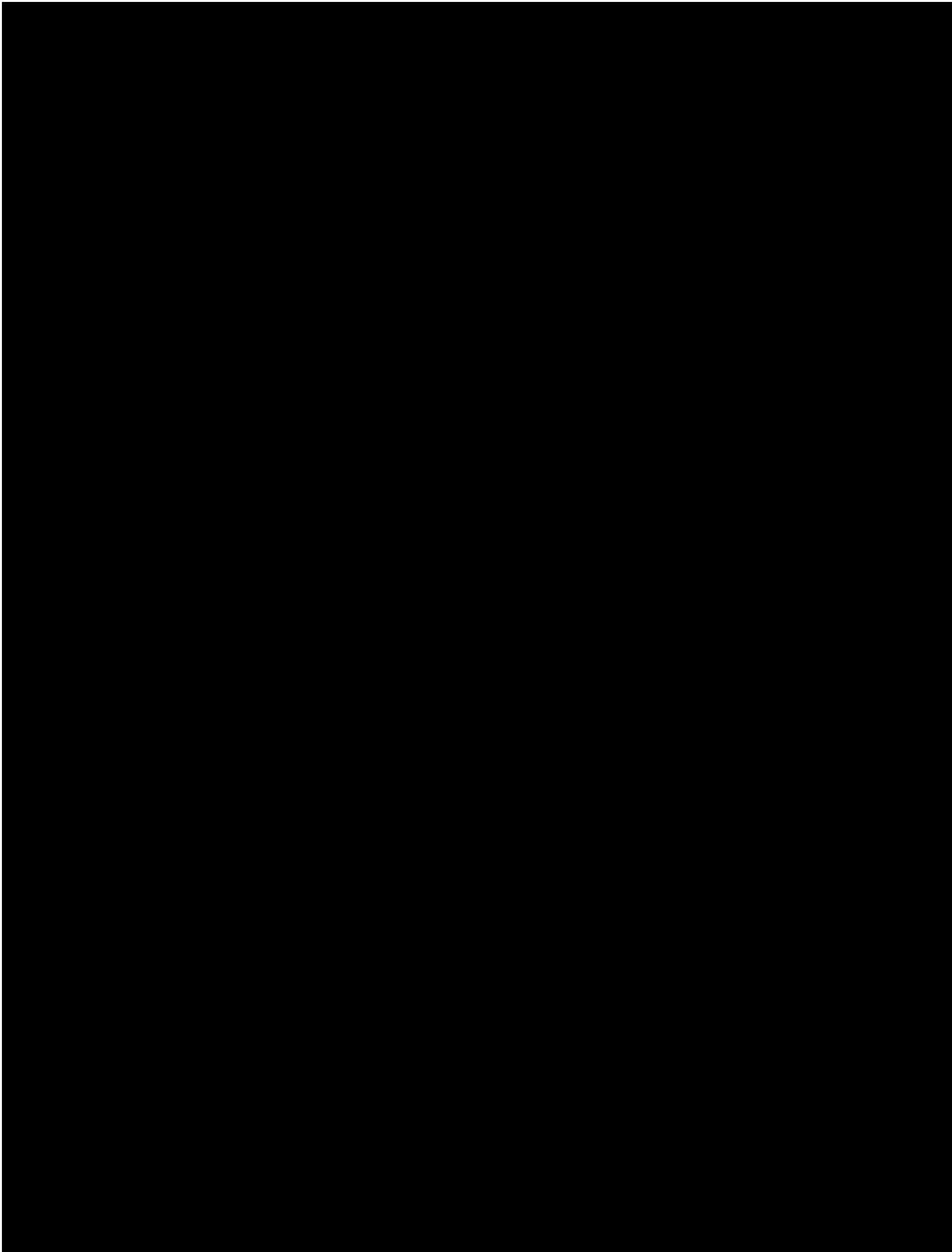
Yes  No

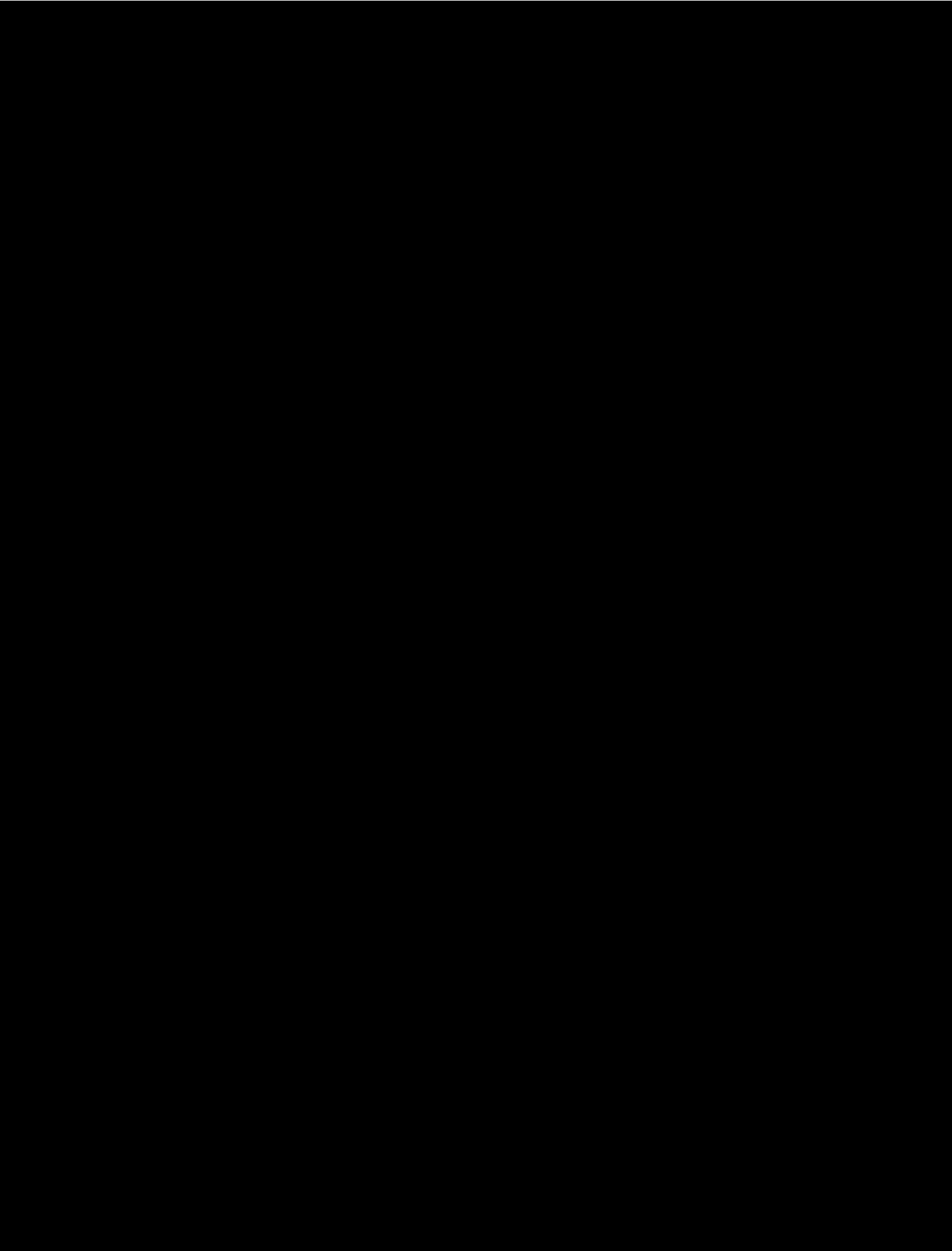
If not, why? No relief granted, some/most grievances progress was stopped due to [REDACTED] Negligences and/or rejecting procedures.

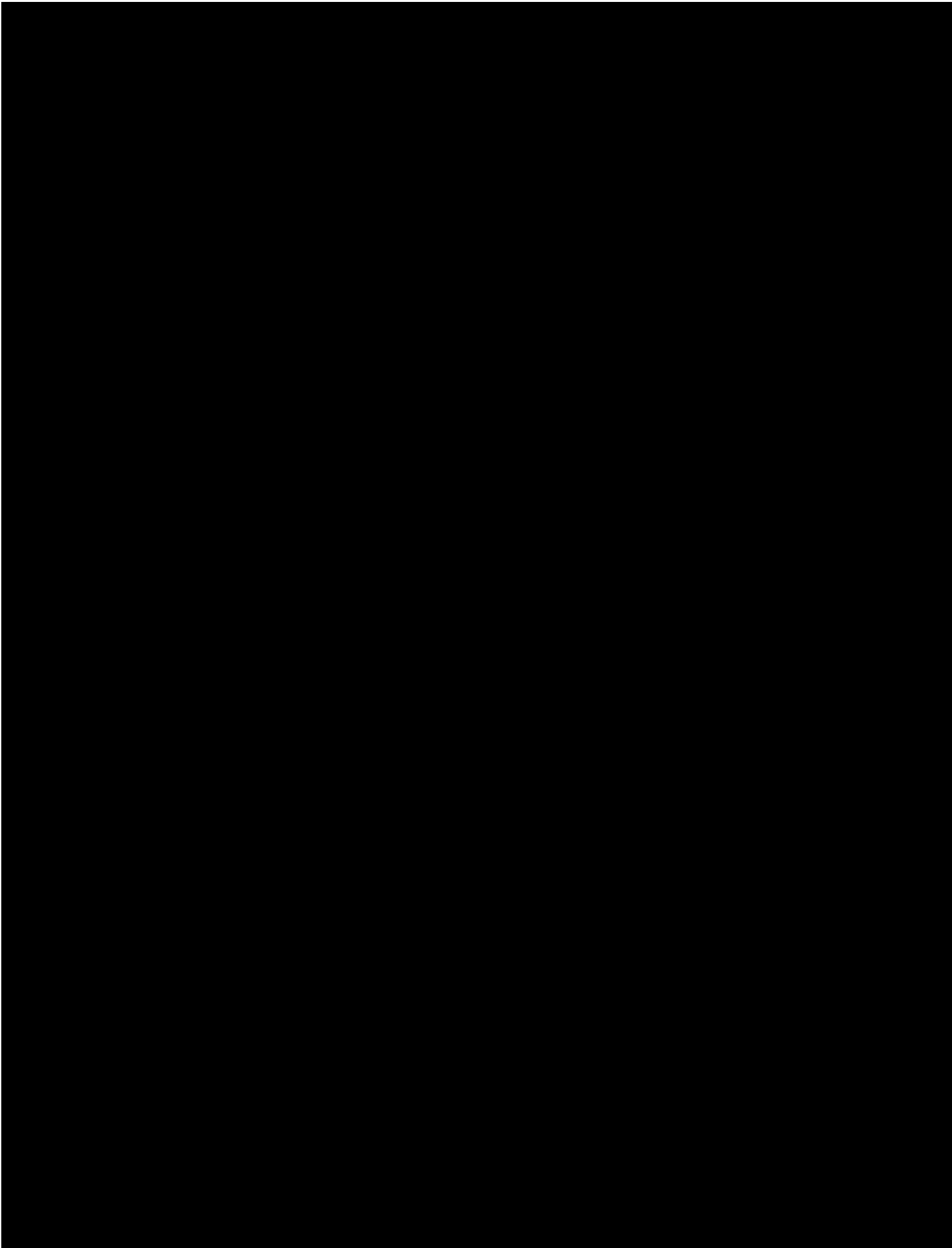
#### VII. Statement of claim

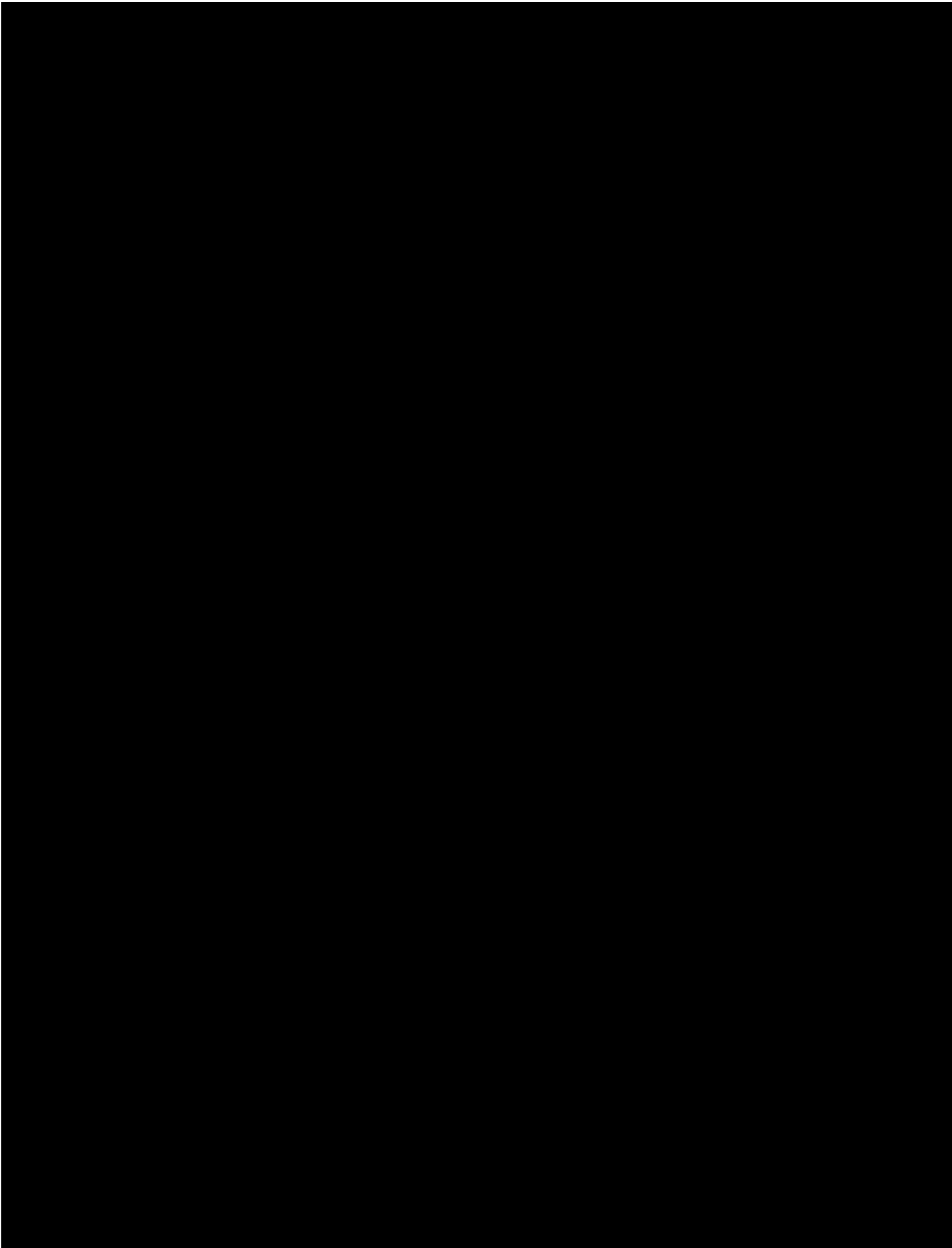
State here (as briefly as possible) the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

This claim is because of the use of excessive force and Retaliation of the ADC [REDACTED] staffed employee Captain Lane, on 2-15-24 between 9:pm-1:am as shown on video camera footages from Max 8 barrack, into hallways, and in the/to the area of the Max Administrations door... Inmate Lonix- [REDACTED] was mistreated, humiliated, and abused/assaulted by ADC staff while restrained. As inmate Lonix was escorted while in handcuffs down steps into the violent an aggressive cpt. Lanes grasp hand Lonix's left arm was jerked and slammed onto riot gate, shackle restraints were <sup>ordered</sup> placed around his ankles. Inmate Lonix give no reason he were viciously attacked abused and tortured throughout hallways? these same handcuffs an shackle restraints were lifted into the air by ADC staff cpt. Lanes leadership, orders stating "Let him fall" and Inmate Lonix's left shoulder an neck were forced to the hard surface floor... by the pull of cpt. Lanes strength. I seek \$9,000 for general damages, \$3,000 pain and suffering damages, \$2,500 for punitive damages, \$500.00 for special damages? Breach of fiduciary duty by cpt. Lane. Also cruel and unusual punishment.











74

EXHIBIT #2 (B)

Inmate is on Puritive Isolation Restrictions until 03/22/2024

**i**

East AR Region. Unit Main Canteen is Open

Regular Inmate Canteen Purchase

03/20/2024 08:19:06 AM

▼ Inmate

Badge#: \*  > ADC #\*:

*Wasn't able to purchase 2 spoons b/c of Restriction.*

Indigent Balance:

Remaining:

Date of Sale:  Time:

Non-Taxable:  Taxable:

Available INDIGENT

G.6



G.6

# G.6

Handwritten notes and diagrams at the top of the page, including a curved line on the left and a diagram of a structure with arrows pointing to it.

Handwritten notes in the middle section of the page.

Handwritten notes in the lower middle section of the page.

Handwritten notes in the bottom middle section of the page.

**ARKANSAS STATE CLAIMS COMMISSION**

(501) 682-1619  
FAX (501) 682-2823



KATHRYN IRBY  
DIRECTOR

101 EAST CAPITOL AVENUE  
SUITE 410  
LITTLE ROCK, ARKANSAS  
72201-3823

May 13, 2024

Shane Lonix (ADC [REDACTED])  
[REDACTED]

RE: **Claim No. 241852 – deficient filing**

---

Dear Mr. Lonix,

Your claim has been filed but has not been transmitted to the Arkansas Department of Correction because the claim exceeds the page limitations set out in Ark. Code Ann. § 19-10-208(f). The text of this subsection is set out on the following page for your review. I am also enclosing your filing for your convenience.

Pursuant to Ark. Code Ann. § 19-10-208(f)(3)(A)(ii), you have forty-five days from the date of this letter to resubmit your complaint in compliance with the statute or to file a motion for leave to exceed the page limitations. Failure to do so will result in the dismissal of your claim without prejudice. Ark Code Ann. § 19-10-208(f)(3)(C).

Sincerely,

Mika Tucker

ES: cmcdaniel

Enclosures

**Ark. Code Ann. § 19-10-208(f)**

- (1) A claimant who is an inmate in the Department of Correction or the Department of Community Correction at the time the claim or action is filed is limited to no more than:
  - (A) Five (5) pages of written factual allegations and legal argument in his or her complaint; and
  - (B) Five (5) additional pages of exhibits to accompany his or her complaint.
- (2)
  - (A) An inmate filing a claim or action may file a motion to allow him or her to file additional pages of factual allegations, argument, or exhibits in excess of the limitations under subdivision (f)(1) of this section.
  - (B) A motion filed under this subdivision (f)(2) may be granted only if the commissioners of the Arkansas State Claims Commission find that the inmate needs the additional pages to fully explain his or her claim or action or if the claim or action is sufficiently complex to warrant additional pages.
- (3)
  - (A) If an inmate files a claim or action that exceeds the page limitations under this subsection, the commission shall:
    - (i) Assign the inmate's claim a docket number; and
    - (ii) Consider the inmate's claim filed, but mail the inmate's complaint and any attached exhibits back to him or her and give the inmate forty-five (45) days to:
      - (a) Resubmit his or her complaint and any attached exhibits in compliance with this subsection; or
      - (b) File a motion requesting permission to file a complaint and accompanying exhibits that exceed the page limitations under this subsection.
  - (B) The forty-five-day time period under this subsection is excludable time in calculating the statute of limitations for the inmate's claim or action.
  - (C) The commission may dismiss an inmate's complaint without prejudice if the inmate fails to:
    - (i) Resubmit a complaint and attached exhibits that meet the page limitation requirements of this subsection; or
    - (ii) File a motion requesting permission to file a complaint and attached exhibits that exceed the page limitation requirements of this subsection.
  - (D)
    - (i) If the commission grants a motion for a complaint and accompanying exhibits that exceed the page limitation requirements of this subsection, the commission shall set out in the order granting the motion the revised timeline for the inmate to file his or her complaint and accompanying exhibits.
    - (ii) The commission may set a revised limit on the number of pages an inmate's complaint and accompanying exhibits may be.

Acts of 1949, Act 462, § 3; Acts of 1983, Act 470, § 3; Acts of 2019, Act 785, § 2, eff. July 24, 2019.

JUN 10 2024

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6-6-24

## Checking the status of claim # 241852

- my mail is continuously being lost, stolen, or neglected!  
I sent a response to the 45 day deficient filing Notice since 5-13-24 and sent/sign by Sargent Coffield on 5-22-24 at around 5:Am... as sent out.
- I can not tolerate irregular treatment for ~~too~~ long without trying to correct the people involved. And if I'm having trouble with the completion of my mail, then all other matters don't matter.
- I'm asking - requesting, that the Arkansas State claims commission take action. these recording video cameras shouldn't be used for nothing.
- if, in fact the courts has received my resubmission of claim, "I have copies", Then my statement still stands as in my mail has been and is being lost, stolen, and neglected?
- what good is a rule if there not being enforced?  
FRCP-11, 16, & 38.
- if, the courts has not received claim # 241852, I need another complaint form? I couldn't copy that.



- my legal actions deserves a voice behind it, requesting a scheduled hearing.

**From:** [ASCC New Claims](#)  
**To:** [Tawnie Rowell \(DOC\)](#)  
**Cc:** [Kathryn Irby](#); [Mika Tucker](#)  
**Subject:** CLAIM: Shane Lonix v. ADC, Claim No. 241852  
**Date:** Friday, July 26, 2024 9:18:00 AM  
**Attachments:** [Shane Lonix v. ADC agency ltr .pdf](#)  
[Shane Lonix Claim - Includes Def ltr, updated claim and supporting docs, CI claim status request, and Order on MTE - 241852.pdf](#)  
[Shane Lonix v. ADC- 241852 ltr re two addresses.pdf](#)

---

Please see attached. Contact Mika Tucker with any questions.

Thank you,  
Caitlin

**Caitlin McDaniel**

*Administrative Specialist II*

**Arkansas State Claims Commission**

101 East Capitol Avenue, Suite 410

Little Rock, Arkansas 72201

(501) 682-1619

## ARKANSAS STATE CLAIMS COMMISSION

(501)682-1619  
FAX (501)682-2823



KATHRYN IRBY  
DIRECTOR

101 EAST CAPITOL AVENUE  
SUITE 410  
LITTLE ROCK, AR 72201-3823

July 26, 2024

Ms. Tawnie Rowell  
Arkansas Division of Correction  
1302 Pike Avenue, Suite C  
North Little Rock, Arkansas 72114

*(via email)*

RE: ***Shane Lonix v. Arkansas Division of Correction***  
**Claim No. 241852**

Dear Ms. Rowell,

Enclosed please find a copy of the above-styled claim filed against the Arkansas Division of Correction. Pursuant to the Arkansas Rules of Civil Procedure, as well as Claims Commission Rule 2.2, you have **thirty days from the date of service** in which to file a responsive pleading.

Your responsive pleading should include your agency number, fund code, appropriation code, and activity/section/unit/element that this claim should be charged against, if liability is admitted, or if the Claims Commission approves this claim for payment. This information is necessary even if your agency denies liability.

Sincerely,

Mika Tucker

ES: cmcdaniel

cc: Shane Lonix (ADC [REDACTED]), *Claimant* (w/ encl.)

<p><b><u>Note to Claimant or Claimant's counsel:</u></b> The Claims Commission copied you on this correspondence to provide you with confirmation that your claim has been processed and served upon the respondent agency.</p>
---

**ARKANSAS STATE CLAIMS COMMISSION**

(501) 682-1619  
FAX (501) 682-2823



KATHRYN IRBY  
DIRECTOR

101 EAST CAPITOL AVENUE  
SUITE 410  
LITTLE ROCK, ARKANSAS  
72201-3823

May 13, 2024

Shane Lonix (ADC [REDACTED])  
[REDACTED]

RE: **Claim No. 241852 – deficient filing**

---

Dear Mr. Lonix,

Your claim has been filed but has not been transmitted to the Arkansas Department of Correction because the claim exceeds the page limitations set out in Ark. Code Ann. § 19-10-208(f). The text of this subsection is set out on the following page for your review. I am also enclosing your filing for your convenience.

Pursuant to Ark. Code Ann. § 19-10-208(f)(3)(A)(ii), you have forty-five days from the date of this letter to resubmit your complaint in compliance with the statute or to file a motion for leave to exceed the page limitations. Failure to do so will result in the dismissal of your claim without prejudice. Ark Code Ann. § 19-10-208(f)(3)(C).

Sincerely,

Mika Tucker

ES: cmcdaniel

Enclosures

**Ark. Code Ann. § 19-10-208(f)**

- (1) A claimant who is an inmate in the Department of Correction or the Department of Community Correction at the time the claim or action is filed is limited to no more than:
  - (A) Five (5) pages of written factual allegations and legal argument in his or her complaint; and
  - (B) Five (5) additional pages of exhibits to accompany his or her complaint.
- (2)
  - (A) An inmate filing a claim or action may file a motion to allow him or her to file additional pages of factual allegations, argument, or exhibits in excess of the limitations under subdivision (f)(1) of this section.
  - (B) A motion filed under this subdivision (f)(2) may be granted only if the commissioners of the Arkansas State Claims Commission find that the inmate needs the additional pages to fully explain his or her claim or action or if the claim or action is sufficiently complex to warrant additional pages.
- (3)
  - (A) If an inmate files a claim or action that exceeds the page limitations under this subsection, the commission shall:
    - (i) Assign the inmate's claim a docket number; and
    - (ii) Consider the inmate's claim filed, but mail the inmate's complaint and any attached exhibits back to him or her and give the inmate forty-five (45) days to:
      - (a) Resubmit his or her complaint and any attached exhibits in compliance with this subsection; or
      - (b) File a motion requesting permission to file a complaint and accompanying exhibits that exceed the page limitations under this subsection.
  - (B) The forty-five-day time period under this subsection is excludable time in calculating the statute of limitations for the inmate's claim or action.
  - (C) The commission may dismiss an inmate's complaint without prejudice if the inmate fails to:
    - (i) Resubmit a complaint and attached exhibits that meet the page limitation requirements of this subsection; or
    - (ii) File a motion requesting permission to file a complaint and attached exhibits that exceed the page limitation requirements of this subsection.
  - (D)
    - (i) If the commission grants a motion for a complaint and accompanying exhibits that exceed the page limitation requirements of this subsection, the commission shall set out in the order granting the motion the revised timeline for the inmate to file his or her complaint and accompanying exhibits.
    - (ii) The commission may set a revised limit on the number of pages an inmate's complaint and accompanying exhibits may be.

Acts of 1949, Act 462, § 3; Acts of 1983, Act 470, § 3; Acts of 2019, Act 785, § 2, eff. July 24, 2019.

Please print in ink or type

Arkansas State Claims Commission

BEFORE THE STATE CLAIMS COMMISSION Of the State of Arkansas

MAY 09 2024

RECEIVED

- Mr. Mrs. Ms. Miss

Shane Lonix (ADC [redacted])

Claimant

vs.

State of Arkansas, Respondent

Arkansas State Claims Commission stamp with date JUN 05 2024 and amount RECEIVED.

COMPLAINT

Shane Lonix (ADC [redacted])

the above named Claimant, of [redacted]

(Street or R.F.D. & No.) (City)

presented by Shane Ashton Lonix - inmate (Legal Counsel, if any, for Claim)

of [redacted] (Street and No.) (City) (State) (Zip Code) (Phone No.) (Fax No.) says:

State agency involved: Arkansas Division of Corrections Amount sought: \$15,000 fifteen thousand

Month, day, year and place of incident or service: 2-15-24, February 15th, 2024, [redacted] ways 8 Max 8 br

Explanation: This claim is because of the use of excessive force and retaliation of the Arkansas division of corrections "FARU" staffed employee Captain Lane. on 2-15-24 between 9:pm-1:Am as shown on video camera footages from max 8 barrack, into hallways, and in the/to the area of the max administration door... Inmate Lonix-145216 was mis-treated, humiliated, and abused/Assaulted by ADX staff while restrained. As Inmate Lonix was escorted while in handcuffs down steps into the violent an aggressive Cpt. Lane's grasp "hands", Lonix's left arm was jerked and slammed into Riot Gate, shackle restraints were ordered around his ankles. Inmate Lonix gave no reason he were viciously attacked, abused, and tortured throughout hallways? These same handcuffs and shackles restraints were lifted into the air by ADC staff Cpt. Lane's leadership, orders stating "Let him fall" and Inmate Lonix's left shoulder and neck were forced to the hard surface floor... by the pull of Cpt. Lane's strength. I seek \$9,000 for general damages, \$3,000 pain and suffering damages, \$2,500 for punitive damages, \$500.00 for special damages. Breach of fiduciary duty by Cpt. Lane. Also cruel and unusual punishment?

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? Yes; when? 2-26-24; to whom? Pre-statement signed ADC; and that the following action was taken thereon: None

and that \$ None was paid thereon: (2) Has any third person or corporation an interest in this claim? No; if so, state name and address

and that the nature thereof is as follows: Retaliation, use of excessive force and cruel and unusual punishment, negligence failure to protect, Breach of Fiduciary Duty; and was acquired on 2-15-24, in the following manner: ADC Staffed employee at [redacted] Cpt. Lane harmed inmate Lonix while he were restrained.

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.

(Print Claimant/Representative Name)

(Signature of Claimant/Representative)

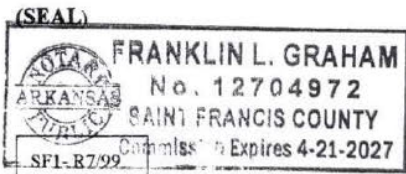
SWORN TO and subscribed before me at [redacted] (City) (State)

on this 27 day of April, 2024 (Date) (Month) (Year)

[Signature of Notary Public]

(Notary Public)

My Commission Expires: 4 21 2027 (Month) (Day) (Year)



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#241852

Arkansas State Claims Commission

800-4

JUN 05 2024

RECEIVED

STATE OF ARKANSAS )  
COUNTY OF Lee )§

**AFFIDAVIT**

I, Shane A. Lonix, after first being sworn, do hereby swear, depose and State that: ~~1- Requests for Admissions that~~ ~~2- That cpt. Lane admit the truthfulness of all knowledgeable Facts~~ ~~3- Inmate Lonix grievance dated 1-29-24 was signed by cpt. Lane of 1st step, which never got returned to inmate Lonix with response~~ ~~4- That inmate Lonix stated he was injured, "out loud" as cpt. Lane abused, retaliated, and aggressively harassed Inmate Lonix's Limbs~~ ~~5- That even after cpt. Lane's "shove in the back of Inmate Lonix, while in hallway holding cage"~~ ~~and after Lonix's top head hit the wall, that cpt. Lane's Torture continued when as seen on video, "giving the order and removing inmate Lonix (I), from cage, cpt. Lane grabbing Inmate Lonix ankles, legs, and chains, which took him off his standing into the air as cpt. Lane stated "let him drop, let him fall" - that's what I want"~~ ~~Inmate Lonix left similar an neck was pulled to the floor~~ ~~6- FRCP rule 36~~ ~~7- Exhibit #4 memorandum of points and Authorities~~

I further swear that the statements, matters and things contained herein are true and accurate to the best of my knowledge, information and belief.

3-20-24  
DATE

Shane Lonix  
AFFIANT

[Redacted]  
SOCIAL SECURITY #

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 13 day of April, 2024.

Franklin L. Graham  
NOTARY PUBLIC

My Commission Expires 

1000  
1000

#241852

800-4

STATE OF ARKANSAS )  
 ) §  
COUNTY OF Lee )

**AFFIDAVIT**

I, Shane A. Lonix, after first being sworn, do hereby swear, depose and State that: On 2-15-24 between 9:pm-1:Am placed in the aggressive hold of Captain Lane... Left arm jerked, slammed, and grinded into max 8' bar track riot gate while in handcuffs, then, Inmate Lonix-145216 was placed in Anckle restraints. witnesses of EARU ADC Staff CO-White and Sgt. Jackson... While cpt. Lane forced Inmate Lonix to the floor; tugged, pulled, and dragged, then carried in main hallway in front of the max administration. Left arm again abused by cpt. Lane. Lonix was placed in hallway holding cage, pushed, shoved, in the back as his head "top head" hit the wall. "I felt a cool rush", as Inmate Lonix was pulled back out of cage and swept, lifted, grabbed from his feet, "ankles", legs as the orders of cpt. Lane stated "let him drop", "let him fall" "...I were then pulled, jerked, from the lean of my torso to the cage as I were forced to the floor once more" ... face first because of cpt. Lane, "I slammed hard on my left shoulder an neck"! I still hurt. Video footages, camera of EARU. ~~request for Admissions~~ ~~Exhibit #4~~ ~~Notice of memorandum~~

I further swear that the statements, matters and things contained herein are true and accurate to the best of my knowledge, information and belief.

3-15-24  
DATE

Shane Lonix  
AFFIANT

[Redacted]  
SOCIAL SECURITY #

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 13 day of April, 2024.

Franklin L. Graham  
NOTARY PUBLIC

My Commission Expires





pg. 2

#241852

FRCP-38

Inmate Lonix [REDACTED] were Not able to proceed with any grievance of the said Staff of ADC? Due to the failures of ADC [REDACTED] Staff members Negligences.

On 11-2-23, afternoon time at the [REDACTED], inmate Lonix were sent to/placed in isolation one, 16 cell by Lt. Kelley? Since then, Inmate Lonix Never received correct/Normal treatment services, which lead to inmate Lonix filing grievances, placing 3.00 sick calls, sending many inmate request forms, sending out letters, and making pre calls - signed statement on 2-26-24?

~~FRCP 4, 8~~

On 2-15-24 between 9:pm-1:Am minutes after the attack of cpt. Lane and picture he states "I will Never do that again"? And "He prefers to see a man"? while cpt.

~~FRCP 409~~

Lane persuades [REDACTED] he leaves?

~~FRCP 83, 84~~

On 2-15-24 between 9:pm-1:Am at [REDACTED] is seen on video camera footages; max 8 barrack, and throughout hallways onto the max administration door area? On the 2<sup>nd</sup> tier of Max 822, CO-Wofford orders inmate Lonix to "empty that towel out"? basically to shake myself down? Inmate Lonix [REDACTED]? I empty a large store bought towel, containing (soap, soap dish, small towel, and Boxer-short)? I was placed in handcuffs (Not locked) by CO-mr. White as I were directed from 822 cell for a shower? I hear from CO-Wofford "Normally when they got an attitude like that, I usually don't take they ass to the shower"? I raised my left foot for the remaining chain lengthed restraints to be placed upon my ankles when Both ADC guards insisted that I move along without being fully restrained? As CO-Wofford begins to grab and weigh on my left arm (shoulder), I immediately flinch and state "can CO-white grab me and can ya'll switch"? CO-Wofford tightens her grip, states "No" and pushes my arm in the direction of the shower? while I started to snap away from her hysterical motion and vibe, she becomes more agitated and feminine? while she orders me back into 822 cell, I refuse and CO-Wofford becomes more aggressive? Instead of ADC Staff calling the All available staff call or writing a disciplinary, I was forced to the edge of 822 cell as I used motions Not to enter, I became violent trying...

Name [REDACTED]

#241852

~~Advice of rights~~

Informal Investigation 1-5

Motion to Compel Answer

RCF-16

my Name is Shane Ashton Lonix born [redacted] creole from Fort Polk, Louisiana An army base? Prison sentence "plea-deal" signed Nov. 10, 2010 weightsville unit, Arkansas - Life w/o parole sentence?

~~RE 901, 902~~

Documented Facts: 2012, [redacted] ADC guard "mazzoni" orders inmate Lonix to "catch your rack", Lights out and exits 14 brk. minutes later instead of writing a disciplinary or calling the All available staff call, ADC guard rips blanket off the table while 2 inmates played dominoes? incident occurs?

2013-2015 [redacted] unit, inmate Dereck Irland "crispy" burns inmate Lonix's jointed lighting fixture, but inmate Lonix was charged by varner unit ADC Staff over \$825.00?

2017-2018, Cummins unit, ADC sargent "Female" places inmate Lonix under direct orders of entering a 2-racked cell that housed inmate marcus johnson "marlow minutes after the refusals of both inmates? Instead of calling the All available staff call or writing a disciplinary, the ADC Female sargent maneuvers inmate Lonix into 2-male cell as inmate Lonix was fought in [redacted] Disciplinary wrote on both inmates, but inmate marcus johnson was punished?

2019-2024 [redacted] cases from inmate Lonix 5:19-cv-00341, 4:20-cv-00179 both denied? 4:23-cv-01041, claim #290013 claim #240637, legal mail lost/stolen and ended legal actions? FRCP-11

(Neglect)

on 1-27-24, morning time of [redacted] Sgt. Peacock an CO-Evans denied inmate Lonix

~~FRCP 32(a)(4)~~

[redacted] on 1-29-24, practitioner Mr. kirchstand fails to provide medical

~~BCP-26(a)(3)~~

services of allowing inmate Lonix to view medical jacket? on 3-8-24, medical

~~RE 803(5)~~

practitioner Ms. Bennett fails to produce medical care of a cure, x-rays, and/or

MAI Scans? on 1-29-24 Captain Lane signs first step process of a medical

grievance... which was avoided and Never Returned back to inmate Lonix? All

grievances signed by ADC EARU staff were abandoned such as 12-6-23 by Sgt.

Jackson, 12-10-23 by Sgt. Johnson, 2-27-24 by Sgt. King, And 3-22-24 by Sgt. Nickens?

Shane Lonix

Page 3

Informal investigation

#241852

to kick CO-wofford when CO-white pulled me from kicking a full force kick, which he then had full control of any of my further actions? After the All available staff call was finally made by CO-wofford, she states "I should have hit you with this bar", "I got chu", and "I'm gone get you". moments and/or minutes pass when ADC guards I recognize, on a few I don't recognize, shows up entering max 8 barrack between 9:pm-1:am? I hear a mexican who was housed in 824 cell while in the shower cell saying "Dam, s.A.L. go hard" Sgt. Jackson grabs my arm when I explain to him to calm down because the problem is over? He respects this notion of situation and try's to guide me out the barrack off the 2<sup>nd</sup> tier, when CO-wofford finds her way to me and nudges/shoves me in the back as I begin to step down on steps to the 1<sup>st</sup> floor? So, I pause/stop? with CO-white on my left and Sgt. Jackson on my right and females behind me blocking CO-wofford's progress? I then, look to my front downward while cpt. Lane was holding a can of mase in his right hand?

Retaliation I was finally departed from CO-wofford, but cpt. Lane switches the can of mase to his left hand when he snatches up my left arm? I was grabbed with his left hand, then yoked up and forcefully slammed into/onto max 8 barrack Riot Gate by cpt. Lanes right hand? My left arm was <sup>repeatedly</sup> repeatedly abused and harmed by cpt. Lane? I heard the mexican-824 cell-shower saying "Dam, what the fuck ya'll ain't suppose to do that"? Cpt. Lane orders that the ankle restraints be placed upon me while he banged my left arm into/onto steel/metal and forces me into the hallway out of max 8 barrack? ..while fully restrained? I request to cpt. Lane to "calm down", I state [REDACTED]

[REDACTED] at all I could hear in response were [REDACTED] put them shackles on him. (no shackles on restraints) from wrists to ankles? cpt. Lane who is at least or over 215 pounds - 6'2 in height ..jerks and violently manures my left arm (shoulder) and motion of my walking ability (motor ability)?

# 241852

Pg. 4

I weigh [REDACTED] I gave No reason for these continued actions of Cpt. Lane. Cpt. Lane caused unnecessary force within my ability to walk as he maneuvered my ability in harmful risks/tasks, my legs began to tremble and shake as I were tossed up and down on a decline that caused my knees to buckle within my strength? I collapsed to the floor/ground and I was unable to stand at my own will? Cpt. Lane decides to tug, pull, and drag my left arm, then orders the remaining staff to



[REDACTED] scooped me up from the floor ordering to Sgt. Jackson to "Let him drop, Let him go, Let him fall"? This is a breach of fiduciary duty by Cpt. Lane? (Sgt. Jackson isn't seen after this incident working for [REDACTED] or on the compound)?  
 (Cruel and unusual punishment because I were punished more than the law allowed.)

D. S. S.

Arkansas State Claims Commission

11/11/2024

RECEIVED

#241852

pg. 5

Informal investigation

~~FE 701~~

Sgt. Jackson states "if I let him go, if I drop him he will fall" Cpt. Lane orders once more "that's what I want, let him fall"? I were placed as an inclining lean of my torso onto that hallway holding cage cell by Sgt. Jackson



on my neck, I know my helpless feet and legs, members on my legs and my torso is then placed into hallway holding cage cell as the door was shut and locked? A female captain from population took 2 photos of inmate Lonix moments/minutes afterwards? It is false imprisonment after I received discipline 2-21-24 and completed punitive 3-21-24, but still being housed/held captive in isolation 3-174 cell until 4-1-24 - afternoon time of released to restrictive housing in max 425 cell? I pray for relief of: \$15,000

\$2,500

I seek punitive-exemplary damages (malicious and egregious) by ADC EAR Staff Cpt. Lane's orders and decisions that harmed an inmate who was fully restrained and opposed no threat to security? Cpt. Lane did not honor the mission and vision statement of the 2020 inmate Handbook?

\$500.00

I seek special-consequential damages because I prefer certain jobs that I am unable to obtain or perform it's required work service/duty due to my prison sentence and the neglect of being healed?

\$9,000

I seek general-compensatory damages (actual damages) that Cpt. Lane violated protocol and obstructed justice by failing his duty to escort an inmate to safety? And Cpt. Lane used physical force to maneuver an inmate who was restrained, into harm?

\$3,000

I seek pain and suffering damages because I am not asking ADC medical to afford any medical expenses there could be, but I am requiring that the courts of allowing the accused individual/s to support my financial assessments of becoming injured means I would like to hire an attorney to prove my nature of injuries?

- Notice of All Admissions, Depositions, Informal Investigation and formal etc. [Signature]

STATE OF NEW YORK  
JAN 10 2024  
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Notice of Motion to add

Clom #241852

Arkansas State Claims Commission

JUN 05 2024

motion for Leave of the page Limitation

Subpoena Production of Documents FRCP-RECEIVED

pg. 6

- Subpoena Duces Tecum: video footages on camera of East AR. Regional unit, Max 8 and Hallways in front of the Max administrati. Door 2-15-24 between 9:PM-1:AM (requesting All Exhibits into Evidence)
- Picture taken of Inmate Lonix by population female Captain 2-15-24
- population female Captain, cpt. Lane, CO-white, Sgt. Jackson, Lt. Watson, Lt. Keith, Sgt. Johnson, Sgt. Nickens, Lt. King, Sgt. Peacock, Sgt. Gramm, CO-Hobbs, CO-Evans, mental health Jones, Practitioner Bennett & Kirstand - FRCP 27-32
- Custodian of Records X-ray scans, MRI scans
- 7-25-24 Affidavit's from the date of this request, documents be delivered

Exhibit #

- 1-A. Grievance 1-29-24 cpt. Lane
- B. Grievance EAM 24-00424 Aundrea Culclager
- C. Grievance 3-22-24 Sgt. Nickens
- D. Grievance 2-27-24 Sgt. King
- F. Grievance 2-27-24 Sgt. King
- F. Grievance 12-10-23 Sgt. Johnson
- G. Grievance 12-6-23 Sgt. Jackson

H-I Grievance Coordinator Ashley King Cummins unit 8-2-23, 7-27-23

Exhibit #

- 2-A. 2-27-24 9:Am items in Isolation Sgt. Westbrook/mcKnight
- B. Receipt of denial 2 spoons 3-20-24 commissary
- C. yearly earnings 12-19-23
- D. Commissary purchase items 2-1-24
- E. 9-26-23 denial by Warden Pierce Cummins unit

Exhibit #

- 3-A. Disciplinary 2-20-24 & Noted material of remedies
- B. Noted material of remedies
- C. Noted material
- D. Noted material
- E. Appeal 2-21-24 denied

Exhibit #

4 A. ... / Exhibit #4-B. Inmate Handbook

Joe L...

page - 7

# 241852

Exhibit # 5 - Grievance by Lt. Watson on 4-3-24, "the Nature of this grievance was informing ADC staff that No other grievance were returned an yet signed of first Step...but, it too was Never returned of Second Step process and completion of 1<sup>ST</sup> Step: The signing of early morning time.

- Affidavit's 1-6 -
- opposition Statement -
- Claim - and brief forms. -
- Initial Disclosures -

Exhibit # 6 - the original grievance

- Resubmitted complaint ?
- A ~~date~~ set date to submit these Exhibits into evidence ?

Notice of Motion

P3.10

Request for admissions

#241852

- 4. Can you/will you admit or agree that you "cpt. Lane" attended The "All available staff" call moments/minutes after the call was made on 2-15-24 between 9:PM - 1:AM in max 8 barracks of the [redacted] ?
- 5. Will you "cpt. Lane" agree or admit that if an employed ADC worker, works a single 12 hour Night/day shift, ~~could~~ <sup>that</sup> that person could lack the ability to complete his/her job Duty's ?
- 6. Will you admit or agree "cpt. Lane", that on 1-29-24 as your signature was added on Inmate Lonix's grievance, that you ~~did~~ understand the Nature and Reasoning of that Grievance ?
- 7. As inmate Lonix was placed into cpt. Lane's control, would you agree or admit that the inmate from that point on had ~~not~~ violated any policy or rule ?
- 8. Will you agree or admit that No reason was caused by inmate Lonix that enforced cpt. Lane to respond in the manner of violent Natures ?

- 1-3 Affidavits - ?

9. - Requesting the Deposition of Captain Lane ? FRCP - 30, 27-32 ?

10. ~~Is~~ would you admit or agree, that a job is complete when No problem exist ?  
FRCP - 36

11. ~~Would~~ you admit or agree that you were upset, angry, <sup>or</sup> mad that this situation was out of context because it wasn't orcastrated within your desire  
Shane Jones



5-6-24

## Summary Judgment

Pg. 11

#241852

Shane A. Lonix [REDACTED] declare under penalty of perjury: I am the plaintiff in the case of #241852 currently pending in the Arkansas State Claims Commission.

- I, as a pro se litigant would fully understand the denial of these legal actions if only this case were my words verses the defendant/s language...but, this is a case of the defendant/s actions and Leadership decisions that lead an inmates legal enforcement because of harm while fully restrained.
- On 2-15-24, between 9:PM-1:AM, Night-time at the [REDACTED], a call of the All available staff call was broadcasted over the radio "walkie-talkies". I were already restrained by handcuffs on my wrists before I noticed cpt. Lane, who signed a grievance of mine on 1-29-24, enter max 8 barrack this Night...with intents of using the can of mase that were visable in his hands. As I were lead an placed under Captain Lanes Leadership orders, he ordered that the ankle restraints be placed upon my ankles as he yoked up and guided my movements onto the Riot gate of 8 barrack, he slams my left arm and bangs my ~~left~~ shoulder into steel/metal. On a Normal routine escort, I've Never been guided with or into disaster and treated unfair. Cpt. Lane Continued to manuver my body into discredission and harm. I pleaded to cpt. Lane and ADC staff that I were injured/hurt and unable to speed walk while fully restrained, but to No avail cpt. Lane drops me to the floor, tuggs/draggs/then carries me in the area of the max administration door with video cameras present above and drops me once more to the floor, then orders an picks me up, grinds an bangs my left shoulder onto hallway holding cell cage Gate, numerous of times...places me in the cage, pushes my back as I am off balance thinking I were about to be relieved of the Non-Locked restraints, my head hits the wall. Cpt. Lane Shuts the cage, then re-opens the cage, pulls me out and forces me off my feet of standing while stating to Sgt. Jackson "Drop him"! "Let him fall I were pulled by Cpt. Lanes force onto the hard surface on my left shoulder an Neck before he steps a foot on my back Neck/head and leg.

Shane Lonix

A sheet of white paper with two circular punch holes at the top. The page is ruled with horizontal lines. A vertical line is drawn on the right side, creating a margin. The page is otherwise blank.

Motion

pg. 8

FRCP-33 Exhibits into Evidence #4-B. - Interrogatories  
 The Inmate Handbook Division of Correction 22<sup>nd</sup> printing,  
 March 2020 (Revised) edition. Page 4 (Mission Statement - The  
 mission of the ADC is to provide public safety by carrying out the mandates of  
 the courts; provide a safe humane environment for staff and inmates; strength  
 the work ethic through teaching of Good habits; and provide opportunities for  
 staff and inmates to improve spiritually, mentally, and physically.) ?

pg. 4 (Vision Statement - The vision of the ADC is to be an honorable and professional  
 organization through ethical and innovative leadership at all levels, providing  
 cost efficient, superior Correctional Services that return productive people  
 to the community.) ?

pg. 5 Classification - medical classification ? what is procedure if I claim to be hurt ?

pg. 6 Work assignment - disciplinarys for refusing work ?

pg. 7 Living in a Prison Setting - Rebuilding of attitudes, values, work skills ?

pg. 8 Lights out - MP4 players can be purchased through commissary ?

pg. 9 Searches/shake downs - ? what is protocol of a Normal search/shake down ?

pg. 9. Property - 1. personal property & 2. State issued property ?

pg. 10 Enemy Alert Lists - A staff separation can be entered ?

pg. 10 Prison Rape Elimination Act - ?

pg. 11 Inmate Grievance Procedure - 15 days from the date of incident, 3  
 working days step 1, step 2, ?

pg. 13 personal clothing and page 24 - Restrictive Housing - ?

pg. 21 04-8, Battery - use of physical force upon an inmate ?

pg. 21 Assault Category PS-3 - to inflict injury ? Did Capt. Lane inflict injury on 21 ?

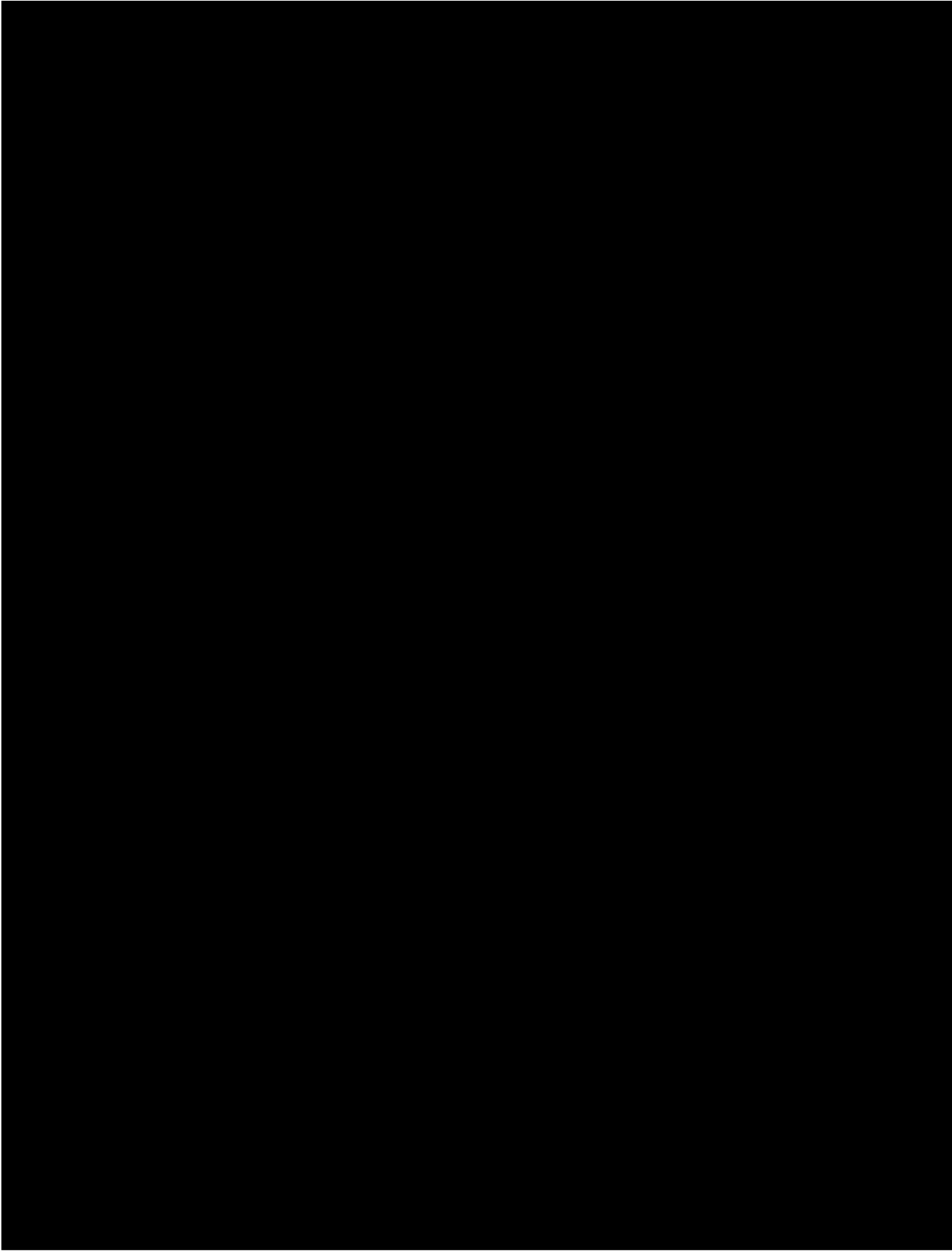
pg. 25 medical services and the AR-833, health services section 6 in 5 states -  
 medical services shall have procedures for dealing with special needs inmates,  
 such as the aged, chronically ill, and those having severely limited perceptual or  
 motor abilities. ?

(pg 9)

case#

241852 - motion for leave to exceed the page limitations

- Has ADC employees followed the mission statement?
- Has ADC employees followed the vision statement?
- Has ADC employees followed the Grievance procedure?
- Has ADC employees followed the Living in a Prison setting task of the 2020 Division of Correction 22nd printing edition of the Inmate handbook?
- Has ADC employees followed the Rules, Regulations, Guidelines, and/or the compliance of the inmate Handbook?
- 5-21-24, why would a caucasian inmate ~~could survive~~ <sup>commit suicide</sup>?
- 4-1-24, what could cause a caucasian inmate to kill himself?



RECIVED  
JUN 8 2004  
AMERICAN  
OVERSIGHT

Lined writing area with a vertical red margin line on the left and horizontal blue lines.





#241852

800-4

STATE OF ARKANSAS )  
 ) §  
COUNTY OF Lee )

**AFFIDAVIT**

I, Shane A. Lonix, after first being sworn, do hereby swear, depose and State that: Captain Lane has interrupted my living arrangements by abusing his powers of work ethic as 2-15-24 between 9:PM-1:Am of Not completing an Normal escort and/or Not performing a Normal 12 hour work shifts duty as an ADC employee. meaning cpt. lane worked this Night at receiving paychecks by a specific duty where I live a 24 hour day to day experience. And since I have Not been treated in harmful manners of being escorted since 2-15-24 from ADC staff which today is 2-10-24, then Cpt. Lane owed me a duty of care on 2-15-24 which he failed to complete. Im requesting to the courts of immediate help of gaining mail records from 1-1-24 to 5-10-24, Video footages from cameras from 2-15-24, 9:PM-1:Am, Responses from ADC employees, business an finance records, and records of every escort from 2-1-24 to 5-10-24. Requesting a tentative Ruling, if any is possible? All because his actions could have caused a Fatal Fall.

I further swear that the statements, matters and things contained herein are true and accurate to the best of my knowledge, information and belief.

5-12-24  
DATE

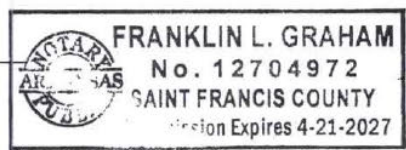
Shane Lonix  
AFFIANT

[Redacted]  
SOCIAL SECURITY #

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 12 day of May, 2024.

Franklin L. Graham  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_





#241852

800-4

STATE OF ARKANSAS )  
 ) §  
COUNTY OF Lee )

**AFFIDAVIT**

I, Shane A. Lonix, after first being sworn, do hereby swear, depose and State that: my burden of proof is met by the Normal escorts by ADC employees from 2-1-24 till 2-15-24. which, on 2-15-24 cpt. Lane made the escort of an inmate Not So Normal between 9:pm-1:Am... Breach of Fiduciary Duty. on a routine escort from 11-2-24 to 2-15-24, No other inmate recieved this type of treatment as seen on video cameras, which indicates cruel and unusual punishment because I was harmed while fully restrained. And because the time and actions did Not involve cpt. Lane, which he chose to "take matters into his own hands"... my life was threatened, my ability to move were violently struck by unwanted force, and After minute/moments of an incident with Co-wofford, cpt. Lane had absolutely no reason to harm me... That's Retaliation. by a preponderance of the evidence from video footages of the camera suggests only one thing... Normal treatment of escort or Not Normal? This claim is in imminent danger.

I further swear that the statements, matters and things contained herein are true and accurate to the best of my knowledge, information and belief.

5 12 24  
DATE

Shane Lonix  
AFFIANT

[Redacted]  
SOCIAL SECURITY #

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 12 day of May, 2024.

Franklin L. Graham  
NOTARY PUBLIC

My Commission Expires:



FRANK L. GRAHAM  
FRANK L. GRAHAM  
FRANK L. GRAHAM  
FRANK L. GRAHAM

G.6

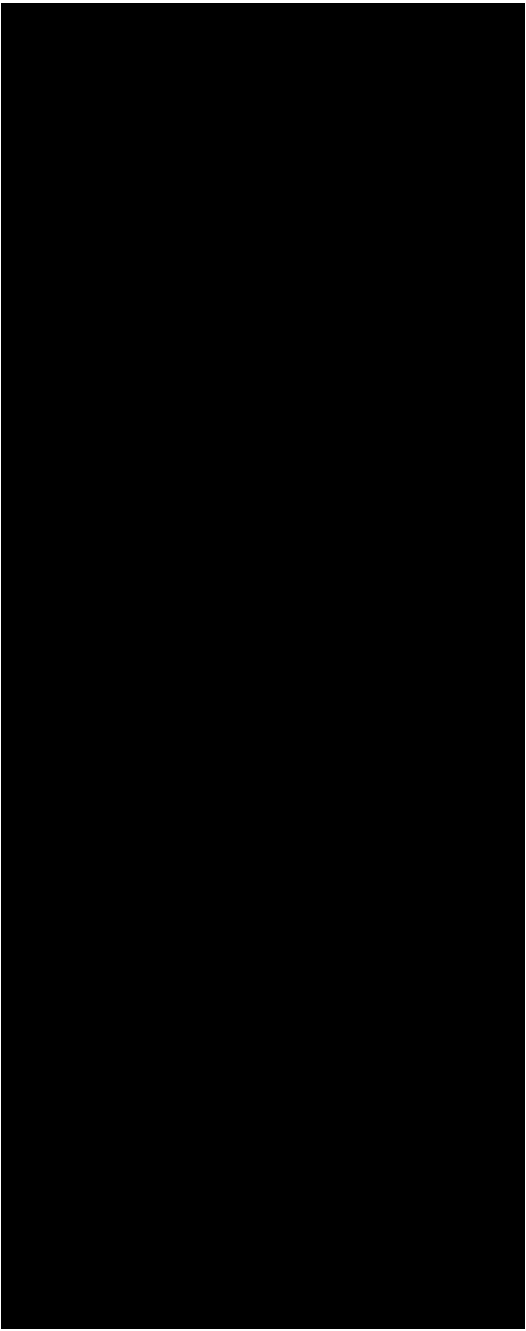
114

G.6



115

G.6



116

# G.6

Handwritten notes and a diagram. The diagram shows a right-angled triangle with a vertical side of length 1, a horizontal side of length 1, and a hypotenuse of length  $\sqrt{2}$ . The angle between the vertical side and the hypotenuse is labeled  $\theta$ . The text next to it says "cos  $\theta = \frac{1}{\sqrt{2}}$ ".

Handwritten notes: "cos  $\theta = \frac{1}{\sqrt{2}}$ "

Handwritten notes: "cos  $\theta = \frac{1}{\sqrt{2}}$ "

Handwritten notes: "cos  $\theta = \frac{1}{\sqrt{2}}$ "

JUN 10 2024

RECEIVED

6-6-24

## Checking the status of claim # 241852

- my mail is continuously being lost, stolen, or neglected!  
I sent a response to the 45 day deficient filing Notice since 5-13-24 and sent/sign by Sargent Coffield on 5-22-24 at around 5:Am... as sent out.
- I can not tolerate irregular treatment for ~~too~~ long without trying to correct the people involved. And if I'm having trouble with the completion of my mail, then all other matters don't matter.
- I'm asking - requesting, that the Arkansas State claims commission take action. these recording video cameras shouldn't be used for nothing.
- if, in fact the courts has received my resubmission of claim, "I have copies", Then my statement still stands as in my mail has been and is being lost, stolen, and neglected?
- what good is a rule if there not being enforced?  
FRCP-11, 16, & 38.
- if, the courts has not received claim # 241852, I need another complaint form? I couldn't copy that.



- my legal actions deserves a voice behind it, requesting a scheduled hearing.

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

SHANE LONIX (ADC [REDACTED])

CLAIMANT

V.

CLAIM NO. 241852

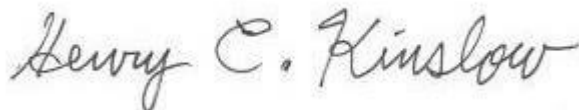
ARKANSAS DIVISION OF  
CORRECTION

RESPONDENT

**ORDER**

Now before the Arkansas State Claims Commission (the “Commission”) is the motion of Shane Lonix (the “Claimant”) for leave to exceed the page limitations set in Ark. Code Ann. § 19-10-208(f)(1). Upon review of the complaint and supporting documentation, the Commission hereby GRANTS Claimant’s motion for leave and will accept the complaint and supporting documentation. However, this order does not constitute any determination as to the validity of Claimant’s claim or any other pending motions.

IT IS SO ORDERED.




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ARKANSAS STATE CLAIMS COMMISSION  
Henry Kinslow, Chair




---

ARKANSAS STATE CLAIMS COMMISSION  
Paul Morris




---

ARKANSAS STATE CLAIMS COMMISSION  
Sylvester Smith

DATE: July 18, 2024

**Notice(s) which may apply to your claim**

- (1) A party has forty (40) days from transmission of this Order to file a Motion for Reconsideration or a Notice of Appeal with the Claims Commission. Ark. Code Ann. § 19-10-211(a)(1). If a Motion for Reconsideration is denied, that party then has twenty (20) days from the transmission of the denial of the Motion for Reconsideration to file a Notice of Appeal with the Claims Commission. Ark. Code Ann. § 19-10-211(a)(1)(B)(ii). A decision of the Claims Commission may only be appealed to the General Assembly. Ark. Code Ann. § 19-10-211(a)(3).
- (2) If a Claimant is awarded less than \$15,000.00 by the Claims Commission at hearing, that claim is held forty (40) days from the date of disposition before payment will be processed. *See* Ark. Code Ann. § 19-10-211(a). Note: This does not apply to agency admissions of liability and negotiated settlement agreements.
- (3) Awards or negotiated settlement agreements of \$15,000.00 or more are referred to the General Assembly for approval and authorization to pay. Ark. Code Ann. § 19-10-215(b).

**ARKANSAS STATE CLAIMS COMMISSION**

(501) 682-1619  
FAX (501) 682-2823



KATHRYN IRBY  
DIRECTOR

101 EAST CAPITOL AVENUE  
SUITE 410  
LITTLE ROCK, ARKANSAS  
72201-3823

July 26, 2024

Shane Lonix (ADC [REDACTED])  
[REDACTED]

Shane Lonix (ADC 145216)  
Post Office Box 180  
Brickeys, Arkansas 72320

RE: ***Shane Lonix v. Arkansas Division of Correction, Claim No. 241852***

---

Dear Mr. Lonix,

Our office notes that you list two different addresses on your claim form. Please promptly provide confirmation of the correct address to both the Claims Commission and the Arkansas Division of Correction.

Sincerely,

Mika Tucker

ES: cmcdaniel

Cc: Tawnie Rowell, Counsel for Respondent (*via email*)

**From:** [Trent Rigdon \(DOC\)](#)  
**To:** [ASCC Pleadings](#)  
**Subject:** Answer - Shane Lonix Case NO. 241852  
**Date:** Wednesday, August 7, 2024 1:36:21 PM  
**Attachments:** [Answer - Lonix 241852.pdf](#)

---

Please see the attached Answer.

Thank you,

Trent Rigdon  
Deputy General Counsel  
Office of the Secretary  
479-746-1138  
615 S Main St  
Jonesboro, AR 72401

**BEFORE THE ARKANSAS STATE CLAIMS COMMISSION**

**SHANE LONIX (ADC ██████)**

**CLAIMANT**

**v.**

**NO. 241852**

**ARKANSAS DEPARTMENT OF CORRECTIONS,  
DIVISION OF CORRECTION**

**RESPONDENT**

**ANSWER**

COMES NOW the Respondent, Arkansas Department of Corrections, 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 an investigation by internal affairs, if warranted, 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: HCA 0100
c. Internal Order: 340301	d. Fund Center: 509
3. The Respondent states that the Arkansas State Claims Commission does not have jurisdiction to hear this matter pursuant to Ark. Code Ann. § 19-10-204.

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 an investigation by Internal Affairs if warranted.

Respectfully submitted,

/s/ Trent Rigdon  
Trent Rigdon Ark. Bar No. 2015227  
Arkansas Department of Corrections  
1302 Pike Avenue, Suite C  
North Little Rock, AR 72114  
479-746-1138 Office  
Trent.Rigdon@doc.arkansas.gov

**CERTIFICATE OF SERVICE**

I certify that a copy of the above pleading has been served this 7th day of August 2024, on the Claimant by placing a copy of the same in the U. S. Mail, regular postage to:

Shane Lonix ( [REDACTED]  
[REDACTED]  
[REDACTED]

/s/ Trent Rigdon  
Trent Rigdon

Correct Address as Requested!

Shane A. Lonix



Arkansas  
State Claims Commission

AUG 10 2024

RECEIVED

*Shane Lonix*

**From:** [Misty Scott](#) on behalf of [ASCC Pleadings](#)  
**To:** [Tawnie Rowell \(DOC\)](#)  
**Cc:** [ASCC Pleadings](#); [Mika Tucker](#)  
**Subject:** CORR: Shane Lonix v. ADC, Claim No. 241852  
**Date:** Wednesday, August 28, 2024 4:24:34 PM  
**Attachments:** [Shane Lonix v. ADC.pdf](#)

---

Ms. Rowell:

Please see attached. Contact Mika Tucker with any questions.

Thank you,

*Misty*

**Misty Scott**  
**Arkansas State Claims Commission**

## ARKANSAS STATE CLAIMS COMMISSION

(501) 682-1619  
FAX (501) 682-2823



KATHRYN IRBY  
DIRECTOR

101 EAST CAPITOL AVENUE  
SUITE 410  
LITTLE ROCK, ARKANSAS  
72201-3823

August 28, 2024

Mr. Shane Lonix (ADC [REDACTED])  
[REDACTED]

Ms. Tawnie Rowell  
Arkansas Division of Correction  
1302 Pike Avenue, Suite C  
North Little Rock, Arkansas 72114

(via email)

RE: ***Shane Lonix v. Arkansas Division of Correction***  
Claim No. 241852

---

Dear Mr. Lonix and Ms. Rowell,

On August 10, 2024, our office received Mr. Lonix's address correction. Please note that it is Mr. Lonix's responsibility to confirm whether any filings, correspondence or orders have been sent to another address on file prior to the date of this letter.

The Commission asks that the ADC counsel to update their records with Mr. Lonix's new address as provided above.

Sincerely,

Mika Tucker

ES: msscott

**From:** [Misty Scott](#) on behalf of [ASCC Pleadings](#)  
**To:** [Tawnie Rowell \(DOC\)](#)  
**Cc:** [ASCC Pleadings](#); [Mika Tucker](#)  
**Subject:** CORR: Shane Lonix v. ADC, Claim No. 241852  
**Date:** Tuesday, September 3, 2024 8:47:39 AM  
**Attachments:** [Shane Lonix v. ADC.pdf](#)

---

Ms. Rowell:

Please see attached. Contact Mika Tucker with any questions.

Thank you,

*Misty*

**Misty Scott**  
**Arkansas State Claims Commission**

## ARKANSAS STATE CLAIMS COMMISSION

(501) 682-1619  
FAX (501) 682-2823



KATHRYN IRBY  
DIRECTOR

101 EAST CAPITOL AVENUE  
SUITE 410  
LITTLE ROCK, ARKANSAS  
72201-3823

September 3, 2024

Mr. Shane Lonix (ADC [REDACTED])  
[REDACTED]

RE: *Shane Lonix v. Arkansas Division of Correction*  
Claim No. 241852

Dear Mr. Lonix,

Please be advised that the Arkansas Division of Correction (the “Respondent”) in the above-styled claim filed an Answer disputing liability. When liability is contested by the Respondent, you have two options:

- 1) You may request a hearing before the Arkansas State Claims Commission (the “Claims Commission”) in writing within fifteen (15) calendar days from the date of this correspondence.
- 2) You may do nothing. If this office does not receive any communication from you within fifteen (15) calendar days from the date of this correspondence, your claim will be dismissed by the Claims Commission for failure to respond.

**Please note that even if you request a hearing on your claim, the filing of a dispositive motion (such as a Motion to Dismiss or a Motion for Summary Judgment) by the Respondent could result in dismissal of your claim before hearing. The failure of a party to file a timely response is sufficient basis for the granting of a motion by the Claims Commission.**

It is your responsibility to know when responses are due to any motions or other pleadings filed in your claim. It is also your responsibility to notify both the Claims Commission and the Respondent if you have a change in mailing address.

Sincerely,

Mika Tucker

ES: msscott

cc: Tawnie Rowell, *counsel for Respondent* (via email)

**From:** [Kris Higdon \(DOC\)](#)  
**To:** [ASCC Pleadings](#)  
**Cc:** [Tawnie Rowell \(DOC\)](#)  
**Subject:** Shane Lonix v. ADC, 241852  
**Date:** Monday, September 9, 2024 10:24:24 AM  
**Attachments:** [ADC Response to RFA.pdf](#)

---

Please see ADC's response to request for admissions.

Kris Alan Higdon (Mr.)  
Attorney at Law  
Office of the Secretary  
1302 Pike Ave., Suite C  
North Little Rock, AR 72114  
Phone: 501-682-9593  
[Kris.a.higdon@doc.arkansas.gov](mailto:Kris.a.higdon@doc.arkansas.gov)

## BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

SHANE LONIX (ADC # [REDACTED])

CLAIMANT

V.

CLAIM NO. 241852

ARKANSAS DIVISION OF CORRECTION

RESPONDENT

ADC RESPONSES TO REQUEST FOR ADMISSION

COMES NOW, Arkansas Department of Corrections and for its Responses to Request for Admissions, states:

**Request for Admission. 1:** Can you/will you admit or agree that you Cpt Lane attended the “all available staff” call moments/minutes after the call was made on 2/15/24 between 9:00 p.m. to 1:00 p.m. in max 8 barracks of the [REDACTED]

**RESPONSE:** Respondent is not Cpt. Lane and therefor denies.

**Request for Admission. 2:** Will you “Cpt Lane” agree or admit that if an employed ADC worker works a single 12 hours Night/Day shift, that person could lack the ability to complete his/her job duty’s?

**RESPONSE:** Respondent is not Cpt. Lane and therefor denies.

**Request for Admission. 3:** Will you admit or agree “Cpt Lane” that on 1-29-24 as your signature was added on inmate Lonix’s grievance, that you did understand the nature and reasoning of that grievance?

**RESPONSE:** Respondent is not Cpt. Lane and therefor denies.

**Request for Admission. 4:** An inmate Lonix was placed into Cpt Lane’s control, would you agree or admit that the inmate from that point on had not violated any policy or rule?

**RESPONSE:** Respondent objects to this request as it is not limited by time.

**Request for Admission. 5:** Will you agree or admit that No reason was caused by inmate Lonix that enforced Cpt Lane to respond in the manner of violent natures?

**RESPONSE:** : Respondent objects to this request as it is not limited by time.

**Request for Admission. 6:** Requesting the deposition of Captain Lane? FRCP-30, 27-32?

**RESPONSE:** Respondent objects to this request as it is not a proper request for admission.

**Request for Admission. 7:** Would you admit or agree, that a job is complete when no problem exist?

**RESPONSE:** Respondent objects to this request as it is overly broad and not likely to lead to the discovery of admissible information. Respondent further objects to this request as it is not a proper request for admission.

**Request for Admission. 8:** Would you admit or agree that you were upset, anger or mad that this situation was out of context because it wasn't or castrated within your desire.

**RESPONSE:** Respondent objects to this request as it is overly broad and not likely to lead to the discovery of admissible information. Respondent further objects to this request as it is not a proper request for admission.

Respectfully submitted,

/s/ Kris Alan Higdon  
Kris Alan Higdon #2004115  
Arkansas Department of Corrections  
1302 Pike Ave., Suite C  
North Little Rock, AR 72114  
Telephone: (501) 682-9593  
Kris.a.higdon@doc.arkansas.gov

CERTIFICATE OF SERVICE

I, Kris Alan Higdon, hereby certify that a true and correct copy of the foregoing has been served upon persons set out below, via first class mail, on this 9<sup>th</sup> day of September 2024.

Shane Lonix (ADC # [REDACTED])  
[REDACTED]

/s/ Kris Alan Higdon  
Kris Alan Higdon

Arkansas  
State Claims Commission

SEP 16 2024

RECEIVED

# 241852

Case: 24-cv-00142-BSM-JTK

pg. 1-4

Final draft

SHANE A LONIX ADC# [REDACTED]

DN

Objection, This is a civil case Not criminal as suggested by Reg

-Retaliation - ADC grievance policy was violated by cpt. Lane... page 11 inmate handbook  
 -Breach of Fiduciary Duty - cpt. lane an ADC employee violated the mission statement, vision statement, living in prison setting, pages 4-7, pages 19 - individual disruptive behavior category, and page 21 Battery category. Inmate handbook.

-Cruel and unusual punishment - cpt. lane harms an inmate that was fully restrained while cameras were present. All violations of the inmate handbook.

1. Are the Arkansas state claims commission stating that claim #241852 is invalid and they don't have subject matter jurisdiction and/or personal jurisdiction of the First Arkansas Regional Unit and ADC employees? Arkansas Division of Corrections.

2. Mr. kris Higdon for future correspondence did Not state whether or Not inmate Lonix has ~~not~~ filed a claim in the wrong jurisdiction, has he? Mika Tucker Did Not state to inmate Lonix of the incorrect jurisdiction of the said defendant and work location under claim #241852, did she?

3. To receive information of an Answer from the respondent Trent Riddon to state after the claim #241852 was filed on 6-5-24, from ~~time~~ 3. "the respondent states that the Ark. State Claims Commission does Not have jurisdiction to hear this matter pursuant to ARK. Code Ann. 19-10-204. if plausible, would have been contested months ago, would it have Not?"

4. Inmate Lonix is requesting motion Discovery from defendants? ~~who does have~~

5. ~~jurisdiction~~ who does have jurisdiction over an Arkansas state prison and ADC employees of E.A.R.U., if Not the Arkansas state claims commission?

6. Justice only rely's on true governing Laws that protect the Land and people. An incident report should have been filed by the ADC employees which I will like to view?

7. ADC staff Lpt. Lane violated policy, rules, regulations, Guidelines, and compliances. That FRCP 4, 5, 6, and 16 was brought to the Courts attention in a timely manner by the plaintiff.

8. The answer of Trent Riddon undermined the creditability of this case #241852 and did Not mention the defendant or support of evidence stating that cpt. lane didn't Retaliate?

RECEIVED  
SEP 18 2024

#241852

Case: 224-cv-00142-BSM-JTK

8-22-24

SHANE A LONIX ADC# [REDACTED]

[REDACTED] ION

Requesting Hearing ?

Elements of Claim #241852 with the preponderance of the evidence.

### #1. The Breach of Fiduciary Duty of Captain Lane.

-cpt. Lane were Employed by the ADC of E.A.R.U. and conducted late hours work schedule duty on February 15, 2024 around 9:pm - 1:am, which as an ADC security guard cpt. Lane was the highest ranked worker in the area of max 8 barrack as he entered After inmate Lonix-145216 was placed by Sgt. Jackson and CO-White into the Leadership of cpt. Lanes orders for an escort, inmate Lonix was immediately rough handled as cpt. Lane orders the leg restraints to be placed upon the inmates ankles. Left shoulder slammed onto Riot Gate.

#2. Retaliation - That moments/minutes into the escort between cpt. Lane and inmate Lonix...cpt. Lane drops the inmate who is fully restrained. Cpt. Lane roughly maneuvers the inmates mobility to move with force and after cpt. Lane is unable to balance the inmates movement, cpt. Lane decides to tug, pull, and drag the inmate... Then a lane slams the inmates left shoulder onto Riot Cage and grinds it and allows the inmate to be placed into the hallway holding cell cage. A Neglected grievance of 1-29-24 by Cpt. Lane.

#3. Cruel and usual punishment - cpt. Lane reopens the hallway holding cell cage and orders inmate Lonix to exit the cage. Cpt. Lane grabs for the inmates ankles and lifts, with saying the orders of, "Drop him", "Let him fall", onto Sgt. Jackson who places the inmates left shoulder onto the cage...cpt. Lane and 2 female guards pull...cpt. Lanes force of pull harms an inmate who is fully restrained, then step a foot on the inmates Neck, then leg, grabs the ankle shackles of the inmate who is lying helplessly on the floor and throws or tosses his feet into the cage, then his torso and closes a lock the cage in front of the max administration Door with the total of cameras present.

- These combined actions of Cpt. Lane violates the inmate handbook's mission statement, the vision statement, Living in a prison setting, ~~from~~ pages 4-7. And page 19 - Individual Disruptive Behavior Category. page 21 - Battery category. And pg. 25 - medical services.

Shane Lonix



#241852

8-22-24

Legal mail <sup>received</sup> implausible or plausible Facts of Testimony?

Normally a person will stop after their actions has caused bodily harm to another person, but on 2-15-24, Cpt. Lane did not care to pause, slow down, or stop his harmful actions onto an inmate who was fully restrained, which

moments after Cpt. Lane slams his arm  
 There is reason to believe that the East Arkansas Regional Unit's ADC staff intentionally caused harm to the inmate, which was his father's birthday.

ADC staff has failed the classification status of the 2020 Inmate handbook stating: Inmates are classified in 3 ways: custody classification, good-time earning classification and medical classification. Custody classification is the result of scoring established criteria including crime, length of sentence, disciplinary record, prior violence escape history and various other factors that determine risk to the public and risk within the institution... etc. (is it not a risk against the inmate Lonix and since inmate Lonix has attended classification, it's a big dispute of the medical area because Lonix states he is injured and the medical staff states they have no record of inmate Lonix being recently injured... Then, the warden suggests options such as for inmate Lonix to submit sick calls and/or use other forms of hand the problem. Because inmate Lonix has no medical restrictions, no medical equipment, "braces, etc.", the classification has failed inmate Lonix's request because the problem isn't relieved, inmate Lonix is considered by the classification of being a normal active inmate... which if sent to work and/or population can cause major problems for inmate Lonix's sentence. Is this not a big risk sending a inmate who feels and believes he is injured into areas where he is not equal in strength? will it not devastate the inmate who has to work?

Arkansas  
State Claims Commission

SEP 16 2024


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Subpena production of documents

I'm requesting a court order granting inmate Lonix access to all Records released to his person such as:  
 medical Records, from ~~11-2-23~~ <sup>11-2-23</sup> to ~~7-15-24~~ <sup>7-15-24</sup> ?

Grievances dated from 2023 to 8-6-24 ?

Disciplinary History 2023 - 2024 ?

Video footages 2-15-24 to 4-1-24 ? max 8 hrs. 

morning time to Early morning - 6:Am - 1:Am ?

Inmate Lonix recieved Legal mail dated from 8-8-24 (ACC - Jonesboro) from the defendant cpt. Lane on 8-22-24 !

This is illegal activity that cameras will prove. as a Request that the camera is my witness ?

Inmate Lonix request that the court make a court-order of inmate Lonix's MRI and other medical exams ? basically to allow the inmate to gain access to his own groundwork duties ?

Has the defendant been served ?

This is a Civil claim not criminal.

8-28-24



**From:** [Kris Higdon \(DOC\)](#)  
**To:** [ASCC Pleadings](#)  
**Cc:** [Tawnie Rowell \(DOC\)](#)  
**Subject:** Shane Lonix v. ADC, 241852  
**Date:** Wednesday, September 18, 2024 1:27:36 PM  
**Attachments:** [ADC Motion to Strike.pdf](#)

---

Please see attached motion to strike.

Kris Alan Higdon (Mr.)  
Attorney at Law  
Office of the Secretary  
1302 Pike Ave., Suite C  
North Little Rock, AR 72114  
Phone: 501-682-9593  
[Kris.a.higdon@doc.arkansas.gov](mailto:Kris.a.higdon@doc.arkansas.gov)

## BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

SHANE LONIX (ADC # [REDACTED]) CLAIMANT

V. CLAIM NO. 241852

ARKANSAS DIVISION OF CORRECTION RESPONDENT

ADC MOTION TO STRIKE PLEADINGS

COMES NOW, Arkansas Department of Corrections and for its Motion to Strike Pleadings, states:

1. Claimant filed his claim on May 9, 2024 seeking \$15,000.00 for allegations of abuse/assault, humiliation and mistreatment.

2. Respondent responded and denied liability.

3. Respondent received two separate pages of numbered paragraphs which were untitled, with Claimant's signature in the bottom right corner.

4. Claimant failed to comply with Rule 5(e) of the Arkansas Rules of Civil Procedure by failing to put a proof of service on either document.

5. Claimant's documents contain statements and apparent questions which have very little, if any, logic or relevance to them.

WHEREFORE, Respondent prays that its Motion to Strike be granted and for all other just and proper relief.

Respectfully submitted,

/s/ Kris Alan Higdon  
Kris Alan Higdon #2004115  
Arkansas Department of Corrections  
1302 Pike Ave., Suite C  
North Little Rock, AR 72114  
Telephone: (501) 682-9593  
Kris.a.higdon@doc.arkansas.gov

CERTIFICATE OF SERVICE

I, Kris Alan Higdon, hereby certify that a true and correct copy of the foregoing has been served upon persons set out below, via first class mail, on this 18<sup>th</sup> day of September 2024.

Shane Lonix (ADC # [REDACTED])  
[REDACTED]

/s/ Kris Alan Higdon  
Kris Alan Higdon

Arkansas  
State Claims Commission

SEP 25 2024

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# 241852

<sup>partial</sup>  
<sup>partial</sup>  
motion for <sup>partial</sup> relief ?

CR-2009-80

9-12-24

I Shane A. Lonix - [redacted] claim ineffective counsel was present due to the Arkansas public defenders Tammy Harris and team Jackie/other member sending me into a Prison of Varner unit population in 2009 because of the pending Capital murder charge <sup>A.C.A. 5-10-101</sup> a class Y felony, <sup>A.C.A. 5-73-103</sup>, possession of a firearm by certain persons, a class B felony, and <sup>A.C.A. 5-36-106</sup>, Theft by receiving, a class B felony, which ignited the Hot check violation (probation revocation) crime I were sentenced to 3 years under. I entered a prison setting quickly by the persuasion of the Arkansas's Counsel "public defenders", Tammy Harris. I were then addressed as <sup>imprisoned</sup> [redacted], which violates my amendments because I were not initially <sup>convicted</sup> ~~charge~~ of the Capital murder crimes. after a few months in prison at the [redacted] unit, I were then shipped or transfer to the [redacted] unit's population... by Tammy harris "to see how well these prisons are". after a few months I were then transferred to ~~Randal Williams unit/Barbara Ester unit~~ <sup>accepting an SATP program</sup> which lasted months until I were sent to Randal L. Williams unit/Barbara [redacted] unit when finally completing the SATP program... All orders and decisions of the AR. public defenders requests. I were put threw pure fear of constant transfers for No reason. After I were drained of my thinking processes ability I were persuaded by AR. Counsel to accept a Life w/o parole sentence while housed in Wrightsville unit, which I were comfortable in. <sup>Nov. of</sup> In 2010 I accepted a plea deal to start my life in prison at the current unit I were already housed in until the ADC personel and/or AR. counsel had other plans to transfer me back to Varner Unit... immediately. ~~in 20~~ I stayed in varner unit from 2010-2017 and transferr [redacted] I've had serjery in 2017 and sent transferred to [redacted] which hav therapy ended early in 2018.



#241852

9-21-24

Motion To Compel

Arkansas State Claims Commission

SEP 25 2024

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1. The Answers from the defendant is one sided, meaning the responder was the only person who knew of this important fact of deposition and Not the plaintiff himself. #4. - responder objects to this request as it is Not limited by time. is it legal to hide information from the courts

2. because claim #241852 raised concern to probable cause of the defendant, The responder has No personal knowledge of the Request for Admissions questions asked. Does he?

- Responder stated: Responder is Not cpt. Lane and therefor denies.

3. I, as the plaintiff under federal rule of evidence, claim I was harmed by the defendant, which violated policy rules, the 8th amendment, because Lt. King and Lt. Kelley were recently terminated from ADC employee members of similar incidents. Breach Retaliation because Cpt. Lane has family members that are employed at and chose to sign a grieving matter of medical help, but Neglected to follow protocol of fair treatment. Thats deliberate indifference. Finally Breach of Fiduciary duty because cpt. Lane is employed by ADC of of trust, governmental worker who owes inmates a duty of care and concern. which, why would an inmate claim that he is injured if he was Not harmed? why was cpt. Lane Not terminated from work duties? or it tests could

prove his lies. #4

As a matter of law, FRCP-27-32, 32(a)(4) ... That the responder has failed to offer the deposition of cpt. Lanes testimony to the Request for admissions page 10? And instead, chose to answer relevant questionable evidence of important facts to this case... These actions of the responder should be considered illegal? or void?

Shirley

2000  
2001  
2002

-----

-----

9-12-24

motion for scheduling order?

#241852

Arkansas  
State Claims Commission

SEP 25 2024

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1. ~~To view~~ For plaintiff to view All incident reports made or wrote about the incident on 2-15-24, 9:pm-1:Am?
2. for plaintiff to be allowed to review the contents of the video camera footages of [REDACTED] incident on 2-15-24, 9:pm-1:Am?
3. For plaintiff to be medically addressed by an outside doctor who can predict what or who caused these tears, pains, and/or irritations within the limbs? Discomforts from the actions of cpt. Lane
4. For plaintiff to be allowed to view and address any other witness and/or report of the incident on 2-15-24, 9:pm-1:Am?
5. For plaintiff to receive an outside-outpatient doctor for a Nerve damage screening? by court order?
6. Also for plaintiff to receive internal Affairs investigation reports and interviews? because NO action was taken, which the compliance office of ADC-Mr. Brisham, after 5 months, contacted me... addressing that NO help was granted.





Arkansas  
State Claims Commission

OCT 19 2024

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IN THE SUPREME COURT OF ARKANSAS

Shane Lonix [REDACTED]

PETITIONER

VS.

CASE NO. 241852/2024-CV-00142-BSM

STATE OF ARKANSAS

RESPONDENT

**MOTION FOR WRIT OF ERROR CORUM NOBIS**

Comes now the petitioner Shane Lonix, pro-se, and for his motion in the above-styled cause does state:

**JURISDICTION**

The Supreme Court of Arkansas has jurisdiction to hear petitions for extraordinary writs pursuant to Article 2, Section 8, 9, 13 and 29 of the Arkansas Constitution and the Fourteenth Amendment of the United States Constitution that guarantees equal protection and due process of law to the states.

**STATEMENT OF THE CASE**

1

On 2-15-24, 9:00 pm - 1:00 Am, inmate Lonix was escorted by ADC, [REDACTED] security staff when the "All available staff" call was made by CO-wofford moments after CO-wofford tried to forcefully place inmate Lonix back into his cell max 822. The help of CO-white forcefully positioned inmate Lonix at the doorway of max 822 when inmate Lonix motioned a foot onto ADC staff. No lock was in place of the already handcuffed inmate Lonix after being placed into the control of higher ranked ADC staff Cpt. Lane who arrived minutes later on the scene. Cpt. Lane immediately jerked the plaintiff and slammed the plaintiff's left shoulder onto the metal Riot Gate of max 8 barrack...

Then ordered the ankle restraints to be placed upon the plaintiff.  
 Cpt. Lane maneuvered the plaintiff's mobility to collapse to the floor  
 when Cpt. Lane tugged and dragged the plaintiff and ordered to Sgt. Jackson  
 and ADC staff to carry the plaintiff who were fully restrained. Cpt. Lane

pulled the plaintiff out and aggressively pulled the plaintiff from his standing ordering to ADC  
 security to "Drop him" let him fall!

**GROUND(s) FOR RELIEF**

security and other inmates, of being bullied without being physically able to prevent harm  
 towards me. I have life w/o parole and the care of ADC security and staff did  
 not protect me while I were fully restrained during an escort.

**ARGUMENT**

The cause of action, the violation of policy, and the sufferages of damage. #1. AR-225 (illegal force), AD-17-06 (use of force), when cpt. lane banged plaintiff's left shoulder onto steel, dragged or tugged the plaintiff, pushed the plaintiff in the back, and lifted the ankle restraints of plaintiff in order for plaintiff to hit the floor. #2. Breach of fiduciary duty, Retaliation, and cruel and unusual punishment, AR-404 (transporting and escorting), (cpt. lane owed inmate plaintiff the right of a Normal escort due to AD-13-006 (mission statement). Instead, minutes into the escort of plaintiff, cpt. lane abused his leadership role as captain lane... while he put his foot on the plaintiff's neck. #3. AD-11-10 (obtaining medical attention), AD-12-09 (Disability act), while plaintiff's complaints were Not examined by machine? Failure to protect.

**CONCLUSION**

Cpt. lane failed the duty of ADC care at [REDACTED] on 2-15-24, 9:00pm-1:00am. Instead of a Normal escort to safety for the plaintiff, cpt. lane violated the constitution of a inmate fully handcuffed and restrained when he deliberately

Caused harm upon the inmate from certain degrees of inflicted pain, Cpt. Lane acted alone with abuse, assault, and battery upon an inmate on 2-15-24.

WHEREFORE, the petition in hand should be granted.

Respectfully submitted,

Shane Lonix  
Petitioner

pro se

VER

I, Shane Lonix, have read the contents of this petition and verify that the contents herein are true, correct and for the purpose therein contained.

Shane Lonix  
Petitioner

State of Arkansas )  
                                  )  
County of \_\_\_\_\_)

SUBSCRIBED AND SWORN to be true and correct before me on this 16 day of

Oct 2025.24

Franklin L. Graham  
Notary Public

4-21-2027  
My Commission Expires



Exhibit 8

7-7-24 (knees & Nerves) 7-9-24  
 7-8-24 (glasses) 7-11-24  
 6-28-24 (~~7-7-24~~) (knees & left shoulder) 7-2-24  
 5-14-24 (glasses) 5-15-24  
 12-5-23 (glasses) 12-7-23

11-27-19 (Newby, Rose) Cummins Provider  
 9-25-19 (Nunag, Leri zca)  
 7-16-19 (Scott, William)  
 6-10-19 (Nunag)  
 5-9-19 (Scott)  
 4-19-19 (Scott)  
 3-12-19 (Nunag)  
 7-27-18 (Daniel Thomas) Ouachita River

<del>4-8-22</del>			
Nunag 3-22-21	Newby 5-5-21	Scott 9-29-20	Collene Rogers 4-8-22
3-11-21	1-27-21	3-9-20	
10-13-20	6-23-20		
3-4-20	6-9-20		
2-12-20	10-7-21		
12-30-20	5-14-21		
9-13-22	8-10-23		
9-13-22	8-1-23		
3-2-22	12-20-22		
10-27-21	1-8-22		
<del>10-7-21</del>			
9-30-21			

Kerstein, Gary 7-15-24  
 6-12-24  
 1-29-24  
 X 11-15-23 X  
 6-28-24

Tracy Bennett 3-8-24  
 11-17-23  
 Lic  
 11-15-23  
 10-11-24

Cummins  
 Bland, Estella 9-19-23

pages 8-12  
 Notes from the provider

Vogue, Tabatha 12-9-22

Video camera into evidence as EXT. #7

~~844 20-7564~~  
 ASL

- [redacted] ADC Security and Director/Deputy Directors are picking and choosing at what extent should an inmate gain relief as the grievance of EDM24-0138. of proof for a resolved grievance without any special requirements!

Medical Jacket records

Exhibit

HEALTH SERVICES RESPONSE TO UNIT LEVEL GRIEVANCE

Attachment IV  
00

INMATE NAME: Lonix, Shane A. ADC #: █ GRIEVANCE #: █ M24-01451

617 Your Grievance dated 6-19-2024, has been received and reviewed as well as your medical record to determine if medically necessary health care, as determined by your health care providers, has been provided to you.

[REDACTED]

his clinical judgement.

Your grievance is without merit.

SIGNATURE OF HEALTH SERVICES ADMINISTRATOR/MENTAL HEALTH SUPERVISOR OR DESIGNEE

*Jason Palmer*

JASON PALMER, MEDICAL SVCS MANAGER  
JUN 28, 2024 11:24:45 CDT

[REDACTED]

If appealing, please submit both the Unit Level Grievance Form (Attachment I) and the Health Services Response (Attachment IV)

Received

JUL 16 2024

Deputy Director  
Health & Correctional Programs

Americans with Disabilities Amendments Act

pages 1-2

Exhibit #9

12-09

Supersedes 09-19

Reference: Act 98 of 2011

2-3-12

Ray Hobbs

I. Policy - it shall be the policy of the ADC to provide procedures for prompt and equitable resolution of ~~contents~~ concerns or complaints alleging any acts of discrimination against inmate with a disability.

Definition C - inmate with disabilities means inmates who have a physical or mental impairment that substantially limits one or more of the major life activities, a record of such impairment, or is regarded as having such impairment. An impairment that substantially limits one major life activity need not limit other major life activities in order to be considered a disability. If the impairment is episodic or in remission, it is a disability if it would substantially limit a major life activity when active.

part D - major life activities - an average person who can perform these activities with little or no difficulty. Some examples are: caring for oneself, performing manual tasks, walking, seeing, hearing, eating, sleeping, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating and working.

part E - the action

part F - to enjoy an equal opportunity

part G - undue hardship - safety of & good order.

IV - procedures - A - sick call request. living conditions etc. 15 day response. ~~pages 1-3~~

part B - grieve the issue

Administrative Directive

2-11-11

Ray Hobbs Director Page 1-3

11-10

Obtaining medical attention for inmates

Supersedes - 93-18

Reference - AR 833 - health services

I. Policy - to ensure that all inmates have reasonable and necessary access to medical care in a timely fashion.

I. Definitions - A - medical emergency - threatens life or limb - loss of consciousness.

part B - urgent medical need - the worsening of an ongoing health situation. or injury not life threatening causing considerable discomfort

part C - routine medical need - any health situation or condition needing attention by medical professional call health care provider for an appointment.

if it is unclear which definition fits the situation, staff should always take the conservative course of choosing the higher level.

Request - motion to Appoint Counsel in the expense of expert witnesses, investigators, etc. ?

Support  
of  
summary  
Notice of motions: Requesting to Add the Video camera into Evidence? EXT.#7  
Summary Judgment - Initial Disclosures continued  
★ ADC, [REDACTED] staff has refused to answer any request, letter, and verbal communication indicating, that the guards do Not care!

FRCP-26 | I chose to meet an confer. by filing [REDACTED]  
were returned or answered/ filed by [REDACTED] ?

3. I chose to write letters to law or legal advisors, even though I were Never responded back too... and/or rejected ?

4. I were assaulted by Captain Lane on 2-15-24, 9:pm-1:Am, which I were fully restrained an opposed No threat to security after cpt. Lane has already been Notified of my medical and problems when "1-29-24" grievance was signed ? Cpt. Lane intentionally meant to harm me ?

5. I was Not fairly treated at [REDACTED] on 2-15-24, between 9:pm-1:Am ? And from 11-2-23 ?

6. Even, as these issues <sup>were</sup> raised to the attentions of wardens, medical, and higher ranked Staff members... Cpt. Lane continued to work around me, which I feel unsafe, unsecure, and unprotected ?

7. The interrogatories insist of providing/introducing the inmate handbook of 2020, that enforces ADC staff to abide by and/or follow ?

AD/AR - 19-10-204 (jurisdiction).

*[Signature]*

I choose to testify in my own Behalf ?

- Opposing Statement - claim # 241852

my opposing Statement to proof of service pleadings is to object the motion of the respondent, that because cpt. Lane has family members and friends among ADC security in the [REDACTED] while I'm housed here until February or March is hazardous to my legal actions, which has forced me to utilize the utensils I am able to obtain; such as paper with my signature that I afforded by a \$12.00 hygiene only purchase of monthly indigent items. if I've asked for proper paperwork and/or copies, but denied by ADC security of me receiving them, then whose to blame? This is violations of ADC security which is out of my control. is it fair that Sgt. Jackson, co-wofford, Lt. Kelley, ~~Lt. King~~ <sup>And</sup> Lt. King has vacated the E.A.R.U., but not Cpt. Lane? Nor I transferred for the security of my legal supplies due to retaliation - probable cause liability

9-24-21

Shane Lewis

- I were unable to send this copy in due time because I can only afford \$12.00 hygiene-stamps monthly. Along with other ~~hygiene~~ <sup>needed</sup> hygiene purchases.
- in reference to summary judgment case 2124-CV-00142-BS of support of my motion for summary judgment - claim 241852

STATE OF ARKANSAS )  
 ) §  
COUNTY OF Lee )

**AFFIDAVIT**

I, Shane Lonix [redacted], after first being sworn, do hereby swear, depose and State that: in 1-21-12, CO-Ester was stabbed by inmate Johnson while Mr. Lane at the time were present, then months later Mr. Lane were promoted to Captain 2012... And CO-Ester died. The Freedom information act were implied because cpts Lane committed a violation of policy on 2-15-21 at [redacted] ADG and has family members that are employed in the same areas, which CO-Higgins is Cpt. Lanes daughter and CO-Wofford a cousin. Cpt. Lane retaliated by harming an inmate who he fully restrained by giving orders of "put the shackles on him" and CO-White and Sgt. Jackson obeyed the order. Cpt. Lane forcefully

[redacted]

I could Not stop cpts Lane's physical act while fully restrained at 9:00pm-1:00am

I further swear that the statements, matters and things contained herein are true and accurate to the best of my knowledge, information and belief.

9-28-24  
DATE

[Signature]  
AFFIANT

[redacted]  
SOCIAL SECURITY #

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 28 day of Sep, 2024.

[Signature]  
NOTARY PUBLIC

My Commission Expires: 4-21-2027



STATE OF ARKANSAS )  
 ) §  
COUNTY OF Lee )

**AFFIDAVIT**

I, Shane Lonix - [REDACTED], after first being duly sworn, do hereby swear, depose and state that: memorandum of points and Authorities in support of plaintiff's motion for Summary judgment. Plaintiff Lonix submits the following legal authorities in support of his motion for Summary judgment. 1- A plaintiff may seek summary judgment at any time after 20 days from the time a lawsuit commenced. FRCP-56(a). 2- The court has power to grant of liability and leave open the issue of the damages that will be awarded to plaintiff. FRCP-56(c). 3- the court shall render a partial judgment in plaintiff's favor if there is no genuine issue as to any material fact and plaintiff is entitled to judgment as a matter of law. FRCP-56(c).  
page 11 of Case 241852 of Notice to Summary Judgment.

I further swear that the statements matters and things contained herein are true and accurate to the best of my knowledge information and belief

DATE 10-7-24

AFFIANT Shane Lonix

SOCIAL SECURITY # [REDACTED]

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, on this 12 day of Oct, 2024.

Franklin L. Graham  
NOTARY PUBLIC

My Commission Expires: 4-21-2027



motion - Summary Judgment

#241852

Declaration of Shane A. Lonix- [REDACTED] in Support of

Summary judgment, I declare under penalty of perjury I am the Plaintiff in the case of #241852.

1. What violates policy is when proper treatments are Not implied of protocol to the policy. Notice of Summary judgment page 11 of #241852.
2. on 2-15-24, between 9 PM-1 AM I were escorted by cpt. Lane in E.A.R ADC custody, due to an All available staff call from Co-wofford.
3. There are rules, laws, and policies that prevents torture, Abuse, and discrimination, also retaliation while I were fully handcuffed and Shackled by ADC staff CO-white from the orders of cpt. Lane as cpt. Lane began to slam my Left Shoulder for No reason. Exhibit #7 into evidence?
4. While I were fully restrained for an escort by cpt. Lane, cpt. Lane Continued to maneuver my mobility into stressful and harmful tasks, which I pleaded to cpt. Lane as I looked to my left, that I were injured and to calm down, when cpt. Lane allowed me to collapse to the floor while he dragged and tugged my left arm. McGirt v. Oklahoma.
5. I Never refused orders during cpt. Lanes escort, I did Not provoke the situation into disaster, and I said and did No wrong during cpt. Lanes violent escort. cpt. Lane banged my left shoulder into metal.

[REDACTED]  
up to Sgt. Jackson who Only followed orders. cpt. Lane pushed me off balan

[REDACTED] mplete my  
[REDACTED] the day  
10-20-24

I declare under penalty of perjury that the foregoing is true and correct.

**From:** [Kris Higdon \(DOC\)](#)  
**To:** [ASCC Pleadings](#)  
**Cc:** [Tawnie Rowell \(DOC\)](#)  
**Subject:** Shane Lonix v. ADC, 241852  
**Date:** Monday, November 4, 2024 2:38:41 PM  
**Attachments:** [Motion to Strike.pdf](#)

---

Please see attached Motion to Strike

Kris Alan Higdon (Mr.)  
Attorney at Law  
Office of the Secretary  
1302 Pike Ave., Suite C  
North Little Rock, AR 72114  
Phone: 501-682-9593  
[Kris.a.higdon@doc.arkansas.gov](mailto:Kris.a.higdon@doc.arkansas.gov)

**BEFORE THE ARKANSAS STATE CLAIMS COMMISSION****SHANE LONIX (ADC # [REDACTED]) CLAIMANT****V. CLAIM NO. 241852****ARKANSAS DIVISION OF CORRECTION RESPONDENT****MOTION TO STRIKE PLEADINGS**

Comes now the Respondent, ADC, by and through their attorney, Thomas Burns, and for their Motions, states:

1. Claimant mailed Respondent a Motion to Compel, Motion for Scheduling Order, and several documents titled affidavit.

2. Claimant's affidavits detail facts that are not included in his original complaint and should be struck from the record,

3. Claimant's Motion for Scheduling Order contains six numbered paragraphs seeking access to video and other documents, but the requests were not styled as request for production pursuant to the Arkansas Rules of Civil Procedure.

4. Respondent cannot properly respond to this "motion" and it should be stricken.

5. To the extent necessary, Respondent denies each and every allegation contained in Claimant's Motion for Scheduling Order.

WHEREFORE, Respondent prays that the responses be stricken and for all other just and proper relief to which they may be entitled.

Respectfully submitted,

/s/ Kris Alan Higdon  
Kris Alan Higdon #2004115  
Deputy General Counsel  
Arkansas Department of Corrections  
1302 Pike Ave., Suite C  
North Little Rock, AR 72114  
Telephone: (501) 682-9593  
Kris.a.higdon@doc.arkansas.gov

CERTIFICATE OF SERVICE

I, Kris Alan Higdon, hereby certify that a true and correct copy of the foregoing has been served upon persons set out below, via first class mail, on this 4<sup>th</sup> day of November 2024.

Shane Lonix (ADC # [REDACTED])  
P.O. Box 979  
[REDACTED]

/s/ Kris Alan Higdon  
Kris Alan Higdon

**From:** [Kris Higdon \(DOC\)](#)  
**To:** [ASCC Pleadings](#)  
**Cc:** [Tawnie Rowell \(DOC\)](#)  
**Subject:** Shane Lonix v. ADC, 241852  
**Date:** Monday, November 4, 2024 2:39:16 PM  
**Attachments:** [Response to Motion to Compel.pdf](#)

---

Please see attached Response to Motion to Compel.

Kris Alan Higdon (Mr.)  
Attorney at Law  
Office of the Secretary  
1302 Pike Ave., Suite C  
North Little Rock, AR 72114  
Phone: 501-682-9593  
[Kris.a.higdon@doc.arkansas.gov](mailto:Kris.a.higdon@doc.arkansas.gov)

**BEFORE THE ARKANSAS STATE CLAIMS COMMISSION****SHANE LONIX (ADC # [REDACTED])****CLAIMANT****V.****CLAIM NO. 241852****ARKANSAS DIVISION OF CORRECTION****RESPONDENT****RESPONSE TO MOTION TO COMPEL**

COMES NOT Respondent, and for its Response to Motion to Compel, states:

1. Respondent denies each and every allegation not specifically admitted to herein.
2. Respondent has received request for admissions from Claimant and timely

responded on September 9, 2024

3. Respondent denies each and every other allegation in paragraph 1 of Claimant's motion.

4. Respondent denies each and every other allegation in paragraph 2 of Claimant's motion.

5. Respondent denies each and every other allegation in paragraph 3 of Claimant's motion.

6. Respondent denies each and every other allegation in paragraph 4 of Claimant's motion.

WHEREFORE, Respondent requests that Claimant's Motion to Compel be denied and for all other just and proper relieve to which it is entitled be granted.

Respectfully submitted,

/s/ Kris Alan Higdon  
Kris Alan Higdon #2004115  
Arkansas Department of Corrections  
1302 Pike Ave., Suite C  
North Little Rock, AR 72114  
Telephone: (501) 682-9593  
Kris.a.higdon@doc.arkansas.gov

CERTIFICATE OF SERVICE

I, Kris Alan Higdon, hereby certify that a true and correct copy of the foregoing has been served upon persons set out below, via first class mail, on this 4<sup>th</sup> day of November 2024.

Shane Lonix (ADC [REDACTED])  
[REDACTED]

/s/ Kris Alan Higdon  
Kris Alan Higdon

**From:** [Kris Higdon \(DOC\)](#)  
**To:** [ASCC Pleadings](#)  
**Cc:** [Tawnie Rowell \(DOC\)](#)  
**Subject:** Shane Lonix v. ADC, 241852  
**Date:** Monday, November 4, 2024 3:50:02 PM  
**Attachments:** [MSJ-Partial.pdf](#)

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Please see attached motion for partial summary judgment.

Kris Alan Higdon (Mr.)  
Attorney at Law  
Office of the Secretary  
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North Little Rock, AR 72114  
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## BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

SHANE LONIX (ADC # [REDACTED])

CLAIMANT

V.

CLAIM NO. 241852

ARKANSAS DIVISION OF CORRECTION

RESPONDENT

MOTION FOR PARTIAL SUMMARY JUDGMENT

Come now the respondent, Arkansas Department of Corrections (ADC), by and through their attorney, and for its Motion for Partial Summary Judgment pursuant to Ark. R. Civ. P. 56, states:

1. The pleadings filed herein reveal that the facts in this case are undisputed or are settled. As a result thereof, the ADC is entitled to summary judgment.

2. Summary judgment should be granted only when it is clear that there are no genuine issues of material fact to be litigated, and the moving party is entitled to judgment as a matter of law. Akers v. Butler, 2015 Ark. App. 650, 476 S.W.3d 183.

3. Summary judgment is proper when a claiming party fails to show that there is a genuine issue as to a material fact and when the moving party is entitled to summary judgment as a matter of law. Ark. R. Civ. P. 56(c); Short v. Little Rock Dodge, Inc., 297 Ark. 104, 759 S.W.2d 553 (1988).

4. The burden of sustaining a motion for summary judgment is always the responsibility of the moving party. Flentje v. First Nat'l Bank of Wynne, 340 Ark. 563, 11 S.W.3d 531 (2000).

5. Further, all proof submitted must be viewed favorably to the party resisting the motion, and any doubts and inferences must be resolved against the moving party. Dodson v. Allstate Ins. Co., 365 Ark. 458, 463, 231 S.W.3d 711, 715 (2006).

## I. CONSTITUTIONAL CLAIMS

6. Because the doctrine of sovereign immunity does not bar plaintiff from litigating his 42 U.S.C. § 1983 claim against defendant individually in state or federal courts of general jurisdiction, the Arkansas Claims Commission has no jurisdiction over the constitutional claim. Smith v. Johnson, 779 F.3d 867 (8th Cir. 2015).

7. Three separate times Claimant's amended complaint states that his rights were deprived of him. First time referencing that a state law attaches due process, once referencing 18 U.S.C. 242, and another time referencing that he was subjected to cruel and unusual punishment in violation of the Eighth Amendment of the United States Constitution.

8. Claimant clearly and unambiguously makes claims of violations of his the 8<sup>th</sup> Amendment right to be free from cruel and unusual punishment.

9. As this Commission does not have jurisdiction to hear constitutional claims, those claims should be dismissed.

## II. BREACH OF FIDUCIARY DUTY

10. Breach of fiduciary duty involves betrayal of a trust and benefit by a dominant party at the expense of one under his or her influence. Cole v. Laws, 349 Ark. 177, 76 S.W.3d 878 (2002).

11. A person standing in a fiduciary relationship with another is subject to liability to the other for harm resulting from a breach of the duty imposed by the relationship. Long v. Lampton, 324 Ark. 511, 922 S.W.2d 692 (1996).

12. In assessing a cause of action for breach of fiduciary duty, we must determine first the existence of a fiduciary relationship and second what duty is owed; the issue of what duty is owed, if any, is always a question of law. Id.

13. Prison officials have a duty to protect prisoners from violence at the hands of other prisoners. Farmer v. Brennan, 511 U.S. 825, 832-33, 114 S. Ct. 1970, 128 L. Ed. 2d 811 (1994).

14. Claimant brings his claim for allegations of physical abuse suffered at the hands of Respondent's employee.

15. While it is undisputed that Respondent has a duty to protect Claimant from violence, Claimant fails to cite any authority to show that Respondent or its employee owes a fiduciary duty to him.<sup>1</sup>

16. As there is no fiduciary duty owed by Respondent or its employee, those claims should be dismissed.

17. Once the moving party makes a prima facie showing of entitlement to summary judgment, the responding party must meet proof with proof in order to demonstrate that there is remaining a genuine issue of material fact. The response and supporting material must set forth specific facts showing that there is a genuine issue for trial. See Ark. R. Civ. P. 56(e) Hampton v. Taylor, 318 Ark. 771, 776-777, 887 S.W.2d 535, 538-539 (1994). The inmate has failed to identify any genuine issues of material fact that would preclude a summary judgment in favor of the ADC. Therefore, this Commission should grant the Motion for Summary Judgment.

18. The ADC has demonstrated a prima facie entitlement to Summary Judgment. To overcome this, the inmate must meet proof with proof and demonstrate the existence of a material issue of fact. Gonzales v. City of DeWitt, 357 Ark. 10. 14-15, 159 S.W.3d 298 301 (emphasis added).

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<sup>1</sup> Undersigned conducted a through search of Arkansas case law and found no case imposing such a fiduciary duty.

WHEREFORE, The ADC, prays that their Motion for Partial Summary Judgment be granted and for all other just and proper relief to which they may be entitled.

Respectfully submitted,

/s/ Kris Alan Higdon  
Kris Alan Higdon #2004115  
Arkansas Department of Corrections  
1302 Pike Ave., Suite C  
North Little Rock, AR 72114  
Telephone: (501) 682-9593  
Kris.a.higdon@doc.arkansas.gov

CERTIFICATE OF SERVICE

I, Kris Alan Higdon, hereby certify that a true and correct copy of the foregoing has been served upon persons set out below, via first class mail, on this 4<sup>th</sup> day of November 2024.

Shane Lonix (ADC # [REDACTED])  
[REDACTED]

/s/ Kris Alan Higdon  
Kris Alan Higdon

**From:** [Misty Scott](#) on behalf of [ASCC Pleadings](#)  
**To:** [Kris Higdon \(DOC\)](#)  
**Cc:** [ASCC Pleadings](#); [Yolanda Charles \(DOC\)](#); [Mika Tucker](#)  
**Subject:** ORDER: Shane Lonix v. ADC, Claim No. 241852  
**Date:** Monday, February 10, 2025 12:23:49 PM  
**Attachments:** [Shane Lonix v. ADC2.pdf](#)  
[Shane Lonix-order3.pdf](#)

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Mr. Higdon:

Please see attached. Contact Mika Tucker with any questions.

Thank you,

*Misty*

**Misty Scott**  
**Arkansas State Claims Commission**

ARKANSAS STATE CLAIMS COMMISSION

(501) 682-1619  
FAX (501) 682-2823



KATHRYN IRBY  
DIRECTOR

101 EAST CAPITOL AVENUE  
SUITE 410  
LITTLE ROCK, ARKANSAS  
72201-3823

February 10, 2025

Mr. Shane Lonix (ADC [REDACTED])

[REDACTED]

Mr. Kris Higdon  
Arkansas Division of Correction  
1302 Pike Avenue, Suite C  
North Little Rock, Arkansas 72114

(via email)

Re: *Shane Lonix v. Arkansas Division of Correction*  
Claim No. 241852

Dear Mr. Lonix and Mr. Higdon:

Enclosed please find an Order entered on February 6, 2025, by the Arkansas State Claims Commission. If you have any questions, please do not hesitate to contact my office.

Sincerely,

Mika Tucker

ES: msscott

## BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

SHANE LONIX (ADC [REDACTED])

CLAIMANT

V.

CLAIM NO. 241852

ARKANSAS DIVISION OF  
CORRECTION

RESPONDENT

ORDER

Now before the Arkansas State Claims Commission (the “Commission”) is a motion for summary judgment filed by the Arkansas Division of Correction (the “Respondent”) as to the claim of Shane Lonix (the “Claimant”). Based upon a review of the motion, the arguments made therein, and the law of Arkansas, the Commission hereby finds as follows:

1. Claimant filed his claim on May 9, 2024, seeking \$15,000.00 in damages related to his allegation that he was subjected to cruel and unusual punishment when he was mistreated, humiliated, abused and assaulted by Respondent’s employees while restrained.

2. Respondent filed a motion for summary judgment,<sup>1</sup> arguing, *inter alia*, that Claimant is making constitutional claims and that the Commission does not have jurisdiction over Claimant’s claim.

3. Claimant did not respond to the motion for summary judgment.

4. The Commission agrees with Respondent that it does not have jurisdiction over this claim. If Claimant believes that he has federal law claims against individual employees or claims

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<sup>1</sup> The Commission notes that Respondent’s motion is titled “Motion for Partial Summary Judgment[;]” however, the motion does not indicate the specific part of Claimant’s claim for which it seeks dismissal. Because the arguments set forth in Respondent’s motion apply to Claimant’s claim as a whole, the Commission will consider Respondent’s motion to be a motion for summary judgment on Claimant’s entire claim.

of constitutional violations, those claims can be brought in a court of general jurisdiction. *See Ark. Code Ann. § 19-10-204.*

5. As such, pursuant to Ark. Code Ann. § 19-10-204 and Ark. R. Civ. P. 12(h)(3), the Commission DISMISSES Claimant's claim.

6. The Commission encourages Respondent to utilize motions to dismiss when seeking dismissal based on lack of jurisdiction in the future where the argument requires no review of matters outside Claimant's claim.

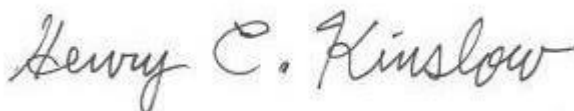
7. Any other pending motions are denied as moot.

IT IS SO ORDERED.




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ARKANSAS STATE CLAIMS COMMISSION  
Dee Holcomb




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ARKANSAS STATE CLAIMS COMMISSION  
Henry Kinslow, Chair




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ARKANSAS STATE CLAIMS COMMISSION  
Paul Morris

DATE: February 6, 2025

**Notice(s) which may apply to your claim**

- (1) A party has forty (40) days from transmission of this Order to file a Motion for Reconsideration or a Notice of Appeal with the Claims Commission. Ark. Code Ann. § 19-10-211(a)(1). If a Motion for Reconsideration is denied, that party then has twenty (20) days from the transmission of the denial of the Motion for Reconsideration to file a Notice of Appeal with the Claims Commission. Ark. Code Ann. § 19-10-211(a)(1)(B)(ii). A decision of the Claims Commission may only be appealed to the General Assembly. Ark. Code Ann. § 19-10-211(a)(3).
- (2) If a Claimant is awarded less than \$15,000.00 by the Claims Commission at hearing, that claim is held forty (40) days from the date of disposition before payment will be processed. *See* Ark. Code Ann. § 19-10-211(a). Note: This does not apply to agency admissions of liability and negotiated settlement agreements.
- (3) Awards or negotiated settlement agreements of \$15,000.00 or more are referred to the General Assembly for approval and authorization to pay. Ark. Code Ann. § 19-10-215(b).

Response to 2-10-25 LetterArkansas  
State Claims Commission

MAR 05 2025

RECEIVED

I don't feel or believe I was fairly treated on the case of claim # 241852.

I'm requesting an appeal form or some type of Appellate method ? I have not been given a fair chance ~~at~~ In the Normal way of trust with legal actions. The only method without trust is Dishonesty.

-Summary judgement response was sent by inmate Lonix in correct time, so if the [REDACTED] ADC Security and Staff continues to violate Laws, policy, and rules, then it is up to these court systems to provide Legal Counsel for my well-being. Since I have Not been provided fairness of ADC and Arkansas, my request is for a supreme judgement. in providing legal help (counsel), this requires a transfer for the opportunity of a fair case, etc. ?

Appeal Request ?

Shane Lonix [REDACTED]  
[REDACTED]

3-3-25 *Shane Lonix*

DEPUTY/ASSISTANT DIRECTOR'S DECISION

INMATE NAME: Lonix, Shane A.

ADC #: [REDACTED]

GRIEVANCE#: [REDACTED] M24-02796

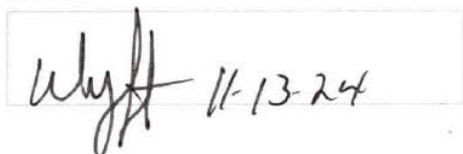
**CHIEF DEPUTY/DEPUTY/ASSISTANT DIRECTOR'S DECISION:**

In your grievance dated 9/9/24, you stated, "By policy under ADC grievance code: 506, 721 which also the inmate handbook explains what items inmates in segregation/max REAS ARE ALOWED TO HAVE WITHIN THEIR POSSESSION. Ms. Sgt. McKnight and/or Ms. White/property room management has violated this policy or code of ethic by not allowing me to receive headphones, shower shoes, etc. that the list of property items are clearly visible for inmates such as I Shane A. Lonix housed in X425, [REDACTED] These items I am allowed to have was withheld from my control which is causing me worry, discomfort, and misery due to an incident on 2-15-24, 9:PM-1:AM by Capt. Lane giving me unfair treatment of an escort which he harmed me while I were fully restrained. I feel unsafe of my person and property under the control of ADC [REDACTED] staff. I request relief in some degree? Also codes in violation :305- unit policy, 101-unit transfer, 505-property claims, loss of property, clothing-bedding/footwear, and 100-transfer?"

On 10/11/24, the warden responded, "Inmate Lonix, you stated in your grievance that this incident occurred on 2-15-24. In accordance with policy AD19-34 Inmate Grievance Procedures, inmates should complete a grievance, and it must be submitted within 15 days after the occurrence of the incident, with the date indicated beside "Step 1: Informal Resolution", which you have failed to do so. Therefore, your grievance is without merit."

Your appeal was received on 10/16/24. After a review of your appeal and supporting documentation, I concur with the warden's response. This grievance should have been rejected for being untimely. Therefore, I will not address the merits of your appeal.

DIRECTOR



Please be advised that if you appeal this decision to the U.S. District Court, a copy of this Chief Deputy/Deputy/Assistant Director's Decision must be attached to any petition or complaint or the Court may dismiss your case without notice. You may also be subject to paying filing fees pursuant to the Prison Litigation Act of 1995.