

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JEFFREY BARHAM, *et al.* ::

Plaintiffs, :

v. : Civ. Action No. 02-02283 (EGS)(AK)

CHARLES RAMSEY, *et al.* ::

Defendants. :

AFFIDAVIT OF CASEY LEGLER

1. I certify that I am over eighteen years of age and am competent to testify to the following based on personal knowledge.
2. On September 27, 2002, I was riding my bicycle around Washington, D.C. with others to support non-fossil fuel based modes of transportation when I was forced by police into Pershing Park, and falsely detained and arrested.
3. After I was arrested and put on a bus for many hours, I was taken to the gymnasium of the Institute for Police Science at Blue Plains.
4. I was flex-cuffed with my right wrist to my left ankle.
5. I was left in this position for fourteen hours.
6. During this time, being cuffed wrist to ankle forced me to be in one position for an extended period of time. I have a severe scoliosis and the contorted position of having my right shoulder hunched toward my left leg caused severe, sharp, and excruciating pain in my neck, shoulders, and right upper back.
7. Being cuffed wrist to ankle for an extended period of time caused pain and discomfort in

my left hip ranging from aching discomfort to sharp pain particularly where my hip had to rotate in order to accommodate being in a stressful position.

8. Being cuffed wrist to ankle for an extended period time caused my left leg to cramp up from a lack of circulation.

9. Being cuffed wrist to ankle for an extended period of time forced me to be sitting for hours at a time, causing my buttocks to become numb.

10. Being cuffed wrist to ankle, my right wrist was constantly tugged on by the cuff causing it to become sore.

11. Being cuffed wrist to ankle, I was unable to sleep. The only way I could lie down was roll on my side in the fetal position and place my right arm between my legs. This position caused excruciating pain in my back and shoulders. I would doze off for a maximum of five minutes before I was awoken by the severe pain or an officer telling me to wake up.

12. Before my arrest, I was a retired professional athlete in excellent physical condition.

Having been cuffed wrist to ankle for an extended period of time, after I was released, my body felt as though many parts were out of place, and today my body does not feel the way it did before September 27, 2002.

13. Being cuffed wrist to ankle for an extended period of time was one of the most excruciatingly painful physical experiences I have ever been through.

14. Being cuffed wrist to ankle for an extended period of time was a humiliating and demoralizing experience. Binding the wrist to the ankle is what is done to pigs, and it made me feel subhuman and helpless.

15. Being cuffed wrist to ankle essentially made me powerless, and the police officers abused this situation. For example, I was assigned to sit on a mat that was five feet from a huge industrial fan. Having it blow on me constantly for several hours chapped my lips and wind-burned my face. I would have asked to be moved to a mat further away from a fan, but my friend had made the same request earlier and an officer screamed at her. I sat behind some of the other arrestees on my mat in an attempt to decrease the amount of

wind blowing on me. When the other arrestees were released

I asked an officer to turn it off. The officer walked over to the fan, turned it so that it was blowing directly on me. The officer left it like this for an hour before turning the fan off.

16. It was clear to me that cuffing arrestees wrist to ankle for an extended period of time was a punitive measure. It was meant to censor and deter protest, and terrify the arrestees from protesting again. When arrestees asked the officers how long we would be detained, some of the officers stated, "We're gonna keep you until Sunday. We're gonna keep you here until it's all over."

17. Today, over three years since September 27, 2002, when I think about being cuffed wrist to ankle for fourteen hours I am flooded with feelings of fear, sadness, demoralization, shock, and trauma. I do not think I will ever get over the shock and trauma of that experience.

18. I certify under the penalty of perjury that the foregoing is true and correct. Executed on January 13, 2006.


Casey Legler