

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JEFFREY BARHAM, *et al.*

Plaintiffs,

v.

CHARLES RAMSEY, *et al.*

Defendants.

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

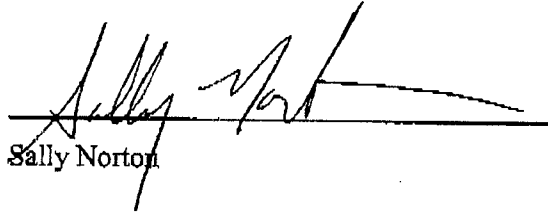
AFFIDAVIT OF SALLY NORTON

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 attending a nursing conference and I entered Pershing Park to associate with demonstrators and see if there was a speaker to listen to when I was 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 11 to 12 hours.
6. I know from my medical training as a nurse that there is a routine way muscles and ligaments work in the human body. The human body is also accustomed to a routine posture. Being placed in an unnatural position causes pressure to be placed on areas of the body that are not used dealing with such pressure, and the muscles are stretched in a manner that it is not used to. As a result, the body has to work especially hard to maintain

- that unnatural position, thereby causing pain, discomfort, and fatigue.
7. During the time I was in the gymnasium, being cuffed wrist to ankle for an extended period of time caused pain and discomfort in my back and neck. I had previously sustained injury to my back, colloquially called "nurse's back" which is caused by activities associated with patient care, such as lifting and assisting patients. Having my right wrist cuffed to my left ankle forced my body to be twisted with no leverage to stretch. This triggered the pain that is associated with "nurse's back": I experienced pain and stiffness in my thoracic vertebral area which is located in the mid to upper back, in my lumbar sacral area which is located in the lower back, and in my neck.
 8. Being cuffed right wrist to left ankle for multiple hours caused soreness and stiffness in my neck.
 9. The cuff on my right wrist constantly pulled on my wrist, causing it to be sore and tender.
 10. Being cuffed right wrist to left ankle severely limited the range of movement of my left leg, causing it to feel stiff.
 11. When I was cuffed wrist to ankle, there were only a few positions that my body could be in. I could lie on my side in the fetal position, sit up in the fetal position, or sit cross-legged. I actively changed positions to alleviate and avoid pain and discomfort but, being restricted to such few position for an extended period time, I still felt pain and discomfort.
 12. Being cuffed caused pain and discomfort to the point where I did not sleep at all during the 11 to 12 hours that I was in the gymnasium.
 13. When I returned to my hotel room upon being released, I had a severe headache and stiff neck.
 14. When I returned to my hotel room upon being released, I took 600 milligrams of Advil to

alleviate pain and inflammation.

15. For several days after my release, I felt stiffness and soreness in my back, neck and left leg. I continued to take an anti-inflammatory drug to alleviate this discomfort.
16. I certify under penalty of perjury that the foregoing is true and correct. Executed on January 11, 2006.


Sally Norton