

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 MARY CANALES

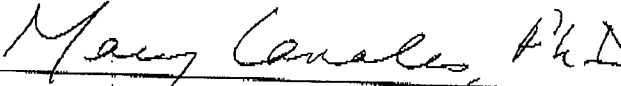
1. I certify that I am over eighteen years of age and am competent to testify to the following based on personal knowledge.
2. On September 27, 2002, I was attending a nursing conference and I entered Pershing Park to associate with demonstrators and see if there was a speaker to listen to when I was 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 eight to nine hours.
6. I know from my medical training as a nurse that the position that wrist to ankle cuffing forces one to be in is harmful to the human body. The body is not meant to be in one position for an extended period of time. This can affect muscle tone, causing the muscles to stiffen. Being forced in one position for an extended period time can also affect blood flow which in turn affects the extremities causing a numb and tingly sensation. A lack of

nutrients can also affect blood flow. As the arrestees in the gymnasium were fed very little during their hours of detainment, the lack of nutrients likely had a compounding adverse affect on blood flow.

7. During the time I was in the gymnasium, being cuffed wrist to ankle for an extended period of time caused agonizing pain in my right shoulder. Previous to September 27, 2002, I had sustained a shoulder injury which, after treatment and therapy, had healed. Being rear cuffed for hours on the bus prior to entering the gymnasium re-injured my shoulder. Then, being cuffed right wrist to left ankle, I could not stretch out my shoulder. This exacerbated and increased the inflammation in my shoulder and it felt stiff and locked in one position.
8. During the time I was in the gymnasium, being cuffed wrist to ankle for an extended period time caused agonizing pain and constant throbbing throughout my entire back. The pain in my right shoulder was radiating throughout my back. Being cuffed wrist to ankle forced me to be in the fetal position on a mat with little cushioning which worsened the pain in my back.
9. During the time I was in the gymnasium, being cuffed wrist to ankle for an extended period time caused pain and discomfort in my neck. This pain was radiating from my right shoulder.
10. Being cuffed right wrist to left ankle caused pain in my right wrist which was already bruised from being rear cuffed earlier in the day. When I tried to move to find a less painful position, the cuff dug into my wrist thereby agitating the bruise.
11. After I was released, being cuffed wrist to ankle for several hours caused persistent pain in my shoulder. I had to attend physical therapy and treatment from an orthopaedic sports

medicine physician for several months.

12. After I was released, being cuffed wrist to ankle for several hours caused my whole body to feel stiff the next day.
13. It is clear to me that the manner of cuffing arrestees wrist to ankle for an extended period of time was intended to be punishment. The police officers clearly wanted to send a message that, "This is what happens if you protest so don't do it again."
14. I was unable to sleep during the several hours I was cuffed wrist to ankle in the gymnasium. I was anxious that the officers would do something to me if I fell asleep. I had never thought that they would treat us the way that they did, so there was no way to know what they were capable of and what they would do next.
15. Being cuffed wrist to ankle for an extended period of time was a dehumanizing, degrading, and humiliating experience, and it was intended to be so. Imagine the irony: I was cuffed into a contorted position for several hours as if I was a criminal, and just hours after my release, I was in a business suit presenting at the State of the Science Nursing Congress which was why I was in Washington, D.C. in the first place.
16. I certify under penalty of perjury that the foregoing is true and correct. Executed on January 11, 2006.



Mary Canales