

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JEFFREY BARHAM, <i>et al.</i>	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civ. Action No. 02-02283 (EGS)(AK)
	:	
CHARLES RAMSEY, <i>et al.</i>	:	
	:	
Defendants.	:	

AFFIDAVIT OF SAMANTHA YOUNG

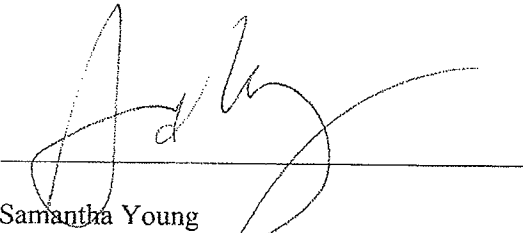
1. I certify that I am over eighteen years of age and am competent to testify to the following based on personal knowledge.
2. On September 27, 2002, I was riding my bicycle around Washington, D.C. with others to support non-fossil fuel based modes of transportation when I was forced by police into Pershing 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 six to seven hours.
6. During this time, being cuffed wrist to ankle for an extended period of time caused a severe and persistent dull aching pain in my lower back and numbness in my buttocks.
7. Being cuffed wrist to ankle, there were only a couple of positions that were feasible. I could sit cross-legged with my left leg on top of my right leg with my right wrist on top of my left ankle, but I had to really arch my back to maintain this position which caused

severe pain and discomfort in my back. I could lie on my side in the fetal position with my right arm tucked in between my legs, but this caused too much strain on my right wrist, causing it to become red and numb. I could also lie on my back with my right leg bent and my left leg crossed over. However, this required me to be holding my left ankle with my right hand the entire time I was in this position in order to avoid pain in my right wrist from the cuffs digging into my skin. The wrist to ankle cuffing affected my ability to balance while sitting up, so I could not sit up with my legs tucked into my chest.

8. Being cuffed wrist to ankle for several hours caused my right wrist to become very sore. Moving positions to lessen pain and discomfort pulled on the cuffs and caused them to dig into my skin.
9. Being cuffed wrist to ankle, I could not sleep. The contorted positions that the manner of cuffing forced me to be in caused too much physical discomfort.
10. After I was released, I continued to feel soreness and stiffness in my back for two days.
11. After I was released, I had difficulty sleeping for two nights because the soreness and stiffness in my back caused too much discomfort.
12. After I was released, the restriction of motion I experienced while cuffed wrist to ankle caused me to feel as though my muscles had atrophied. My body felt weak and beat up.
13. After I was released, I had to constantly stretch for two days to relieve pain and discomfort in my back.
14. It was clear to me that cuffing arrestees wrist to ankle for an extended period of time was intended to be a punitive measure, because the manner of cuffing was completely unnecessary. For example, being cuffed wrist to ankle caused such severe pain and discomfort in my body that I could not comfort and calm myself mentally. The physical

pain and discomfort could have been lessened if I was given extra cuffs to expand the distance between my wrist and ankle. Such a modification would not have endangered the police officers or other arrestees. I made this request at least twice and was denied every time.

15. Cuffing arrestees wrist to ankle was intended to be humiliating and made me feel subhuman. In one instance, I was escorted to the bathroom by a female officer. I was not uncuffed so I had to hop to the bathroom with my wrist down by my foot. I pleaded with the officer to cut the cuffs, to which she casually said, "I don't have any clippers." The officers wanted the arrestees to feel grateful for being allowed to use the bathroom at all.
16. Such behavior by the officers was intended to send a message that, "We can do whatever we want and you can't do anything about it." They wanted to prevent people from protesting, and it worked on me. I did not go to the protest day after I was released for fear of being unlawfully detained again with my wrist cuffed to my ankle.
17. I certify under the penalty of perjury that the foregoing is true and correct. Executed on January 12, 2006.


Samantha Young