

**RECEIVED** IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO

JAN 22 2025

RICHARD W. NAGEL, CLERK OF COURT  
COLUMBUS, OHIO

High Priest aaron Lewis Pampley  
(ENTER ABOVE THE NAME OF THE PLAINTIFF IN THIS ACTION)

IF THE PLAINTIFF IS A PRISONER: PRISONER # A801261

vs.

Cuyahoga County Jail  
(ENTER ABOVE THE NAME OF THE DEFENDANT IN THIS ACTION)

IF THERE ARE ADDITIONAL DEFENDANTS PLEASE LIST THEM:

~~XXXXXXXXXX~~ Michelle henry

Et al.

2:25 CV 0056

JUDGE MORRISON

MAGISTRATE JUDGE BOWMAN

**COMPLAINT**

I. PARTIES TO THE ACTION:

PLAINTIFF: PLACE YOUR NAME AND ADDRESS ON THE LINES BELOW. THE ADDRESS YOU GIVE MUST BE THE ADDRESS THAT THE COURT MAY CONTACT YOU AND MAIL DOCUMENTS TO YOU. A TELEPHONE NUMBER IS REQUIRED.

High Priest aaron Lewis Pampley  
NAME - FULL NAME PLEASE - PRINT

ADDRESS: STREET, CITY, STATE AND ZIP CODE  
Correctional Reception Center  
P.O. Box 300 11271 St. Rt. 762 Orient, Ohio 43146

614 877 2441  
TELEPHONE NUMBER

IF THERE ARE ADDITIONAL PLAINTIFFS IN THIS SUIT, A SEPARATE PIECE OF PAPER SHOULD BE ATTACHED IMMEDIATELY BEHIND THIS PAGE WITH THEIR FULL NAMES, ADDRESSES AND TELEPHONE NUMBERS. IF NO ADDITIONAL PLAINTIFFS EXIST CONTINUE WITH THIS FORM.

PAGE 2 AND 3 OF THIS FORM DEAL ONLY WITH A PLAINTIFF THAT IS INCARCERATED AT THE TIME OF FILING THIS COMPLAINT.

PREVIOUS LAWSUITS:

- A. HAVE YOU BEGUN OTHER LAWSUITS IN STATE OR FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED IN THIS ACTION OR OTHERWISE RELATING TO YOUR IMPRISONMENT? YES ( ) NO
- B. IF YOUR ANSWER TO A IS YES, DESCRIBE THE LAWSUIT IN THE SPACE BELOW. (IF THERE IS MORE THAN ONE LAWSUIT, DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THE SAME OUTLINE.)

1. PARTIES TO THIS PREVIOUS LAWSUIT

PLAINTIFFS:

N/A

DEFENDANTS:

N/A

2. COURT (IF FEDERAL COURT, NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY)

N/A

3. DOCKET NUMBER

N/A

4. NAME OF THE JUDGE TO WHOM THE CASE WAS ASSIGNED

N/A

5. DISPOSITION (FOR EXAMPLE, WAS THE CASE DISMISSED? WAS IT APPEALED? IS IT STILL PENDING?)

N/A

6. APPROXIMATE DATE OF THE FILING OF THE LAWSUIT

N/A

7. APPROXIMATE DATE OF THE DISPOSITION

N/A

Correctional Reception center

- A. IS THERE A PRISONER GRIEVANCE PROCEDURE IN THIS INSTITUTION?  
YES  NO
- B. DID YOU PRESENT THE FACTS RELATING TO YOUR COMPLAINT IN THIS STATE PRISONER GRIEVANCE PROCEDURE? YES  NO
- C. IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

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2. WHAT WAS THE RESULT?

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- D. IF YOUR ANSWER IS NO, EXPLAIN WHY NOT.

Because i was placed in the hole and also placed on a high security precaution to where only SRT and high ranking people like sergeants and lieutenants can pull me out my cell and with them where denying me access to the kiosk so i can file my grievance

- E. IF THERE IS NO PRISON GRIEVANCE PROCEDURE IN THIS INSTITUTION, DID YOU COMPLAIN TO PRISON AUTHORITIES? YES  NO

- F. IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

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2. WHAT WAS THE RESULT?

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DEFENDANTS:

PLACE THE NAME AND ADDRESS OF EACH DEFENDANT YOU LISTED IN THE CAPTION ON THE FIRST PAGE OF THIS COMPLAINT. THIS FORM IS INVALID UNLESS EACH DEFENDANT APPEARS WITH FULL ADDRESS FOR PROPER SERVICE.

1. Cuyahoga county jail  
NAMES - FULL NAME PLEASE  
  
  
ADDRESS - STREET, CITY, STATE AND ZIP CODE
2. 1215 W. 3<sup>rd</sup> Street Cleveland Ohio 44113
3. Michelle Henry 2079 E. 9<sup>th</sup> FL 3 Cleveland Ohio ~~44115~~ 44115
4.
5.
6.

IF THERE ARE ADDITIONAL DEFENDANTS, PLEASE CONTINUE LISTING THEM.

PLEASE WRITE AS BRIEFLY AS POSSIBLE THE FACTS OF YOUR CASE. DESCRIBE HOW EACH DEFENDANT IS INVOLVED. INCLUDE THE NAME OF ALL PERSONS INVOLVED. GIVE DATES AND PLACES.

DO NOT GIVE ANY LEGAL ARGUMENTS OR CITE ANY CASES OR STATUTES.

IF YOU HAVE A NUMBER OF DIFFERENT CLAIMS; PLEASE NUMBER AND SET FORTH EACH CLAIM IN A SEPARATE PARAGRAPH. USE AS MUCH SPACE AS YOU NEED. YOU ARE NOT LIMITED TO THE PAPERS WE GIVE YOU. ATTACH EXTRA SHEETS THAT DEAL WITH YOUR STATEMENT CLAIM IMMEDIATELY BEHIND THIS PIECE OF PAPER.

1. Jurisdiction & venue this is a civil action authorized by 42 U.S.C section 1983 to redress the deprivation, under color of State law, of rights secured by the constitution of the united states the court has jurisdiction under 28 U.S.C section 1331 and 1343 (a)(3). Plaintiff seeks declaratory relief Pursuant to 28 U.S.C section 2201 and 2202. Plaintiff's claims for injunctive relief are authorized by 28 U.S.C section 2283 & 2284 and Rule 65 of the Federal Rules of Civil Procedure.

2. The united states District Court for the southern district of Ohio is an appropriate venue under 28 U.S.C section 1391 (b)(2) because it is where the events giving rise to this claim occurred. each defendant is sued

individually and his official capacity at all times mentioned in this complaint each defendant acted under the color of state law

On the above date on time of March, 10, 2023 between the hours of 7:00<sup>AM</sup> and 1:30<sup>PM</sup> I was pulled<sup>out</sup> of my cell which was located on jail 1 on the 10<sup>th</sup> floor of the Cuyahoga County Jail I was pulled out to go meet with my lawyer which was located on the 7<sup>th</sup> floor of jail 1 when I was done meeting<sup>with</sup> my lawyer I was transported back to the 10<sup>th</sup> floor as I was walking about to go in my Pod a CO Blind side attacked me which was witnessed by my Pod officer and the institutional camera in which

## exhibit A

my Pod officer and the Video Footage will be able to Validate this claim after my Pod officer called for back-up and the co was pulled off me I was taken to medical to be checked out and then was taken back to my cell an where I was placed on a high security precaution to where only SRT and high ranking people like sergeants an lieutenants can pull me out my cell an with they where denying me access to the kiosk so I can file my grievance against the situation [REDACTED]

the cuyhoga county jail is in violation of my constitutional right these are the following Amendments that where violated my Eighth Amendment cruel and unusual punishment and my Fourteenth Amendment a due process the Plaintiff has no plain, adequate, or complete remedy at law to redress the wrongs described herein. Plaintiff has been and will continue to be irreparably injured by the conduct of the defendants unless this court grants the declaratory and injunctive relief which Plaintiff seeks

Exhibit B

## LEGAL CLAIMS

Deliberate indifference to medical treatment

"Due Process" denial of access to the courts

cruel and unusual punishment

use of excessive force and physical brutality by prison officials

in which my Eighth, Fourteenth Amendments were violated

RELIEF

IN THIS SECTION PLEASE STATE (WRITE) BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT, CITE NO CASES OR STATUTES.

WHEREFORE, Plaintiff respectfully prays that this court enter judgment granting Plaintiff a declaration that the acts and omissions described herein violated plaintiff's rights under the constitution and laws of the united states. A preliminary and permanent injunction ~~on~~ ordering defendants to state what it is you want the defendants to do i HighPriest aaron Pampiey want's the defendants to pay me in compensatory damages in the amount of \$ 500.000 against each defendant jointly and severally and Punitive damages in the amount of \$ 250.000 against each defendant and also want's the defendant to pay Plaintiff's cost in this suit and any additional relief this court deems just Proper and equitable

SIGNED THIS 13 DAY OF January 2025.

DePaf  
SIGNATURE OF PLAINTIFF