

SUPPRESSING EVIDENCE OF HIS INNOCENCE...

A.] In 1986 in WCI so-called north cafeteria a white gang member allied with the Chicago "Gangster Disciples" physically assaulting and injuring me. WCI successive Wardens and Security Directors suppresses an officer witness "Incident Report" supporting my whole innocence. [C.O. David J. ██████ Incident Report No. 108818, 2-24-1986, 3:22 p.m.].

B.] In early 1992, a WCI unanimous Program Review Committee {PRC} recommended Irby's transfer to Fox Lake Correctional Institution {FLCI}, medium security custody.

C.] However, WCI Chicago Gangster Disciple member, Frank ██████ physically assaulted Irby at his clothing distribution (C.D.) job. Irby was given 360-days punitive segregation. Frank Henderson was rewarded with an "unscheduled" immediate transfer to Fox Lake Correctional Institution. [See: Adult Conduct Report #484761 (2-pages)].

D.] Later on (9-24-1995) at Columbia Correctional Institution (CCI) another young Chicago Gangster Disciple, a violent street gang member, Michael ██████, assaulted Irby with a dustpan weapon, but his own hand was injured in the incident. And not withstanding his two inmate's objective sworn affidavits proving his innocence, Irby was given the maximum 360-days punitive segregation. ██████ was rewarded with a subsequent transfer to Fox Lake Correctional Institution. [See: Adult Conduct Report #139323].

E.] Later, on (8-12-1993), another Chicago Gangster Disciple, a violent street gang member, Donald ██████ assaulted Irby with a metal ink pen on security camera, with about seventy-five inmate witnesses. Though he was given an Adult Conduct Report, Irby was given the blame and still remains in "Total Social Isolation." Later, inmate ██████ was paroled but shortly thereafter re-incarcerated. A WCI officer gave a written statement proving Irby's innocence. See: Adult Conduct Report #542658].

F.] Later, on (2-2-1995), at WCI Adjustment Center (AC), another Gangster Disciple allied violent gang member, inmate Crowley, verbally sexually assaulted and threatened Irby's life, but though his Adult conduct Report #583653 described the two engaging in identical behavior, only Irby was given an Adult Conduct Report and maximum punishment. [See gen. *Lindell v. Houser*, 422 F.3d 1033 (7th Cir. 2006) (WCI inmate alleged guards used inmates to assault him)].

In continuing wrongs, WDOC is violating Irby's United States Constitutional Federal and State law rights. See e.g., U.S.C. Title 18 ss. 242, and have conspired to continue to deprive Irby of his Constitutional Rights contrary to Title 18 ss. 241, by using Gangster Disciple, a violent prison and street gang, inmates as their "Agent Provocateurs" to assault Irby. See also, gen. *U.S. v Garcia*, 340 F. 3d 1013 [Cal. Prison guards convicted of acting in concert with inmates to assault targeted inmates].

The WDOC/WCI fabricate and maintain manifested prove prejudicial malicious records asserting "bad acts" by Irby as previously above discussed.

But glaringly the lowest of the low in the WDOC/WCI purely evil, continuing wrongdoings, open conspiracy is to deprive Irby of his well documented working hard at "good works" (and a new life of service) and too long overdue opportunity at redemption [and demonstrating rehabilitation]. Irby's last conduct report was in 1995.

Despite freakishly being cast adrift into an upside down world where those sworn to uphold the law is outrageously lawless, and me the so-called outlaw am playing by the rules, a law abiding citizen.

Further, the WDOC/WCI Administration intentionally maliciously houses known documented young (almost all Negroes) gang members; sexual predators; medicated mentally-ill; "Agent Provocateur" inmates, who carry "acting out" sadistically Psycho-sexual terroristic torments (e.g. pounding on my assigned cell walls; extremely excruciatingly loud verbalization noises; harsh obscenities and threats to do bodily harm, etc., etc.) so similar to those purely evil reputedly at Abu Ghraib and Gitmo, Cuba.

The Administration misuses 24/7 lights on; windowless "box car" cells; no outdoors "sunshine"; "fresh air"; nor exercise; total social isolation; no access to rehabilitative programming and no in cage mirror. See gen. *Kerr v. Puckett*, 138 F. 3d 321 (7th Cir. 1998) [Alleged WDOC "Brainwashing" Program is unconstitutional.]

The named WDOC/WCI officials uses over 35-years of social isolation in varied forms of punitive segregation in its cruel and evil unconstitutional continuing wrong, retaliation open conspiracy.

However, let the objective highly esteemed Federal Bureau of Prison {FBOP} at Leavenworth Penitentiary {USP} in Kansas, where Irby spent from January 1998 to March 2000 in its general population with roommates; Trusty Nightshift UNICOR Print Shop job; treatment program participation; education programming; out of cell from 6:00 a.m. to 10:00 p.m., provide its own influential evaluation of Irby's character and behavior as "Excellent." See FBOP Progress Report [1999].

In His Own Words

To Whom It May Concern:

My name is Leon Irby. An Afro-American male born on December 20, 1946. I am currently residing in the Segregation Unit in the Waupun correctional Institution located in Waupun, Wisconsin.

Since February 7, 1972, I have been serving a life sentence for First-Degree Homicide that occurred while residing in Madison, Wisconsin. Later, I was sentenced to an additional fifteen (15)- years in Dodge County Circuit Court after pleading