no-contest to Second-Degree Homicide, stemming from an incident that occurred back in 1977 here at the Waupun Correctional Institution.

Since 1973 I have been a very successful "prisoner activist," litigating and winning numerous "prisoner rights" lawsuits on the behalf of myself and other inmates. ² These cases were often litigated at my own expense.

These victories have resulted in major improvements in all aspects of the Wisconsin Prison System. Including, but not limited to, living conditions; installation of fire retardant mattresses (1977); relief for mentally-ill inmates (1979); due process rights for inmates in disciplinary hearings regarding witnesses (1980); and winning other inmates release from prison (1994), as well as challenging the Wisconsin Department of Corrections "racial discrimination" practices against Afro and Latino-American inmates in their care.

In addition. I have written --- and have had published--several expose' pieces regarding racism, and unlawful prison conditions within the Wisconsin Department of Corrections in major Wisconsin state newspapers, such as, Wisconsin state Journal; Milwaukee Journal Sentinel; and the Milwaukee Courier.

One such expose' that landed on the front page of the Milwaukee courier (circa 1978) addressed negro inmates verbal assaults against newly hired Afro-American correctional officers --who eventually left Waupun Correctional Institution---who were attempting to integrate Waupun Correctional Institution's all-white workforce. In retaliation, my fellow inmates were hostile and threatening towards me, that remains unabated to this day. However, despite my "excellent" and "positive" behavior in Leavenworth, in 2000 I was unexpectedly transferred back to the Wisconsin Prison System to be housed in the newly built "Supermax" prison in Boscobel, Wisconsin. I was now being used to justify the taxpayers dollars wasted on building this facility by being labeled by the Wisconsin Department of Corrections as the "worst of the worst." Yet, I had not had a rule-infraction conduct report in the five years prior to this transfer.³

² Winning lawsuits against the Department of Corrections given their many resources and large pocket books, funded with taxpayer dollars, is not an easy task. So one would have to understand the process to appreciate Leon's accomplishments. His legal skills are well known throughout the Department of corrections by staff and inmates alike.

According to the law regarding Parole Eligibility at the time Leon was sentenced, his parole eligibility off of life, plus fifteen years, is sixteen (16) - years. However, Leon has now served a total of 38- years, which is 22-years *PAST* his statutory parole eligibility date. Not even "rapists" or "child molesters" ---of whom Leon is neither--- with Leon's time has served as much as he has thus far.

³ Boscobel "Supermax" prison was funded and built during the Governor Tommy Thompson administration in which he believed should house the "worst of the worst" criminals in Wisconsin. The problem was, there were not enough "worst of the worst" criminals in Wisconsin to justify the spending of taxpayer dollars on this "get tough on

While housed in then "Supermax" prison. I actively participated in any and all accessible treatment programming. earning several certificates of completion

On May 11, 2007, after spending another seven (7) years of "social isolation" in the "Supermax" prison. I was sent BACK to Waupun Correctional Institution and immediately placed BACK into the segregation unit to continue another long stint of "social isolation," which is where I remain to this day, with no human contact, no contact visits, and no outdoor exercise. Once again, I have been labeled as "too dangerous" to be released into the "general population" here, or, at any Wisconsin State Prison. In addition, 45 percent of the inmates housed here in segregation are diagnosed with some degree of mental illness that, at most times, is inadequately treated.

Due the conditions I am systematically being subjected too. I suffer from a number of physical and mental ailments that has intentionally gone untreated. These ailments include, depression: loss of memory; slowed motor response; sleep deprivation due to the constant yelling and banging by other inmates housed in here with untreated mental conditions; poor vision, due to constant illumination within the cells: and physical pain in my neck, back, legs and hands. (Please see Leon's "Medical Problem List" located in the appendix section of this petition).

Even while housed in segregation --- in degrading and inhumane conditions--- I am constantly being subjected to threats of bodily harm from other inmates and harassment by the correctional officers themselves in their drive to destroy my will to be one day liberated.

Also, while housed here in the segregation unit I have had inmates write false threats to staff in my name and send them to the Security Department. Inmates have stolen monies from my account by forging money disbursements in my name to make purchases that I have no knowledge of. The staff seems to can figure out everything but who is responsible for these threats and forging documents in my name.4

This administration has allowed and suppressed all evidence of young gang member's assaults upon my person over the years, such as, in 1987. Twice in 1992, and again in 1993. As well as their "agent provocateurs" who constantly, intentionally, and knowingly provide false and malicious information to security

⁴ Please see the four (4)-page letter that was written in Leon's name and sent to the Security Dept. Also, see Warden response to Leon's grievances regarding these documents and threats in the appendix.

crime" scheme. Gov. Thompson's solution was twofold: One, create inmates who can be deemed the "worst of the worst" to fill some of the bed space. Two, to insure taxpayers that if we build it --- Supermax--- they'll come. Today, due to human rights violations, the prison has changed its name --- but not its abuse--- as a result of lawsuits that they could not defend. There is still many improvements to be made at this institution.