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"FORMAL COMPLAINT" A.D.A. VIOLATIONS

TO: Disability Rights section, NYA, Civil Rights
Division 245, Dept. of Justice. ADA Coordinator
Cynthia Phelps, Fla. Dept of Corrections, senior
Medical Director Olugbengbo Ogunsanwo,
T. Macey HSA CORIZON

FROM: Ronald Wayne Clark Jr #812974
Union Correctional Institution P-6118
7819 N.W. 228th Street
Raiford, Florida. 32026-4460

Date: August 19, 2014

Subject: ADA Health and safety violations
by Corizon Inc, and their health
care employees.

In January 2014 I began having problems
with my back and right knee. It began to
affect my exercising, I had to give up basket
ball which was one of my few enjoyments.
By June I had to give up volleyball, and all
forms of exercise. For I had went from walk-
ing and moving in some form of pain, to
stumbling around and falling.

on June 9, 2014 Doctor LaFontant here at
Union Correctional Institution (UCI) ordered
a wheel chair pass and an MRI on my right
knee and back. see attached Radiology Reports

dated 11/15/2013, 2/14/2014 and 2/28/2014, showing osteoarthritis in the right knee, and Degenerative Disc Disease. Corizon executives denied the MRIs. Failing to do further testing, much needed testing.

On August 13, 2014 Wednesday, Nurse Groom came to my cell front and stated, "Corizon has D.C. (Discontinued) your wheel chair." They said, "more testing is needed." But the reason more testing hasn't been done is because Corizon Inc's. refusal to approve the testing.

On July 30, 2014 Wednesday, I had seen Doctor LaFontant who ordered MRIs again stating that I'm unable to walk. So a qualified Doctor who has examined me, is being over ruled by some company executive. Doctor LaFontant not only put in an order for the MRIs but ordered that I be sent to the orthopaedic specialist. still pending decision.

since June 2014 I've been dealing with high blood pressure due to the excruciating pain in my back. My blood pressure on August 12, 2014 Tuesday was 174/108, then 168/104 and 169/106. I was sent to urgent care and was seen by Doctor Melendez-Torres who ordered that I be given two injections to help alleviate the back pain. The injections worked for 24 hours. she also prescribed "MethylPREDNISOLONE" which has done nothing.

I am unable to walk, can only stand while holding on to bars, or sturdy structures. I've fallen numerous times in the cell, attempting to

to move about the cell, so on July 18, 2014 I sent a memo to ADA Coordinator requesting an ADA cell with wheel chair. Also contacted T. Macey. And had my mother assist in contacting them, to no avail. I'd send ms Cynthia Phelps a 2nd letter on August 12, 2014 again requesting an ADA Certified cell. which to this day has went unanswered.

In sitting in a cell, completely immobile, can't get down to the shower, law library, Pastoral visits, regular visits can't go outside for fresh air and sunshine. And if there was a fire or some type of emergency evacuation, I'd be in serious trouble.

Corizon is violating my Constitutional Rights, for the courts have stated in Cummings 628 F.2d at 1068 (9th Cir 1980) (inmate with back injury who was denied wheelchair, stated Eighth Amendment claim)

Being that this disability is effecting me, by being unable to walk, standing bending and lifting, I qualify as being disabled under 42 USC § 12102(4)(b)-(d) for this degenerative disc disease will effect me the rest of my life.

I need some one to step in, and override Corizon Inc, protecting my life health and safety, as well as my Constitutional Rights. Please help me with this. see attached pendix.

Radiology Reports.

Respectfully
submitted
Ronald W. Clark



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Radiology Report

PATIENT NAME: CLARK, RONALD

PATIENT ID: 812974

FACILITY: UNION CI

DATE OF BIRTH: 04/20/1968

REFERRING PHYSICIAN: LAFONTANT

DATE OF SERVICE:

11/15/2013

REASON FOR EXAM: c/o pain and instability right knee and pain right hip

RADIOGRAPH OF THE RIGHT KNEE



Findings: Multiple views of the right knee demonstrate no fracture, dislocation, or subluxation. There is no joint effusion. There is moderate osteoarthritis of the patellofemoral joint in the medial joint space compartment of the knee and mild osteoarthritis of the lateral joint space compartment of the knee. The soft tissue planes are normal without radiopaque foreign body.

Impression: Tricompartment osteoarthritis without knee joint effusion.

Transcribed: 11/15/2013 07:16 PM Kolb, Gail,

Verified By: 11/16/2013 12:00 PM Dr. Timothy Dineen, M.D.

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OK TO FILE M.D. INITIAL  DATE 12/4/13
 PULL CHART FOLLOW UP DATE 1/00/00
 NO FURTHER ACTION M.D. INITIAL  DATE
J. AVILES, M.D.-UCR
AR4971861 AV01



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Radiology Report

PATIENT NAME: CLARK, RONALD
FACILITY: UNION CI
REFERRING PHYSICIAN: . . .
REASON FOR EXAM: neck trauma, s/p fight

PATIENT ID: 812974
DATE OF BIRTH: 04/20/1968
DATE OF SERVICE: 02/28/2014

Exam: CERVICAL SPINE

Technique: AP and lateral views of the cervical spine are submitted.

Prior studies: No prior studies are submitted.

Findings: Multiple views of the cervical spine demonstrate loss of the normal cervical lordosis consistent with muscular spasm. There is degenerative disc disease C3-4, C4-5 and C5-6 with narrowing of the disc spaces and marginal osteophytes. There is no evidence of spondylolisthesis or acute bony injury. The perivertebral soft tissues are unremarkable.

Impression: Degenerative disc disease with cervical spasm. ✓

Recommendation: Follow up as clinically indicated. ✓

Transcribed: 03/02/2014 11:56 AM Dineen, Timothy,
Verified By: 03/02/2014 11:56 AM Dr. Timothy Dineen, M.D.

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R. LAFONT, MD
UNION CITY, FLORIDA



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Radiology Report

PATIENT NAME: CLARK, RONALD

PATIENT ID: 812974

FACILITY: UNION CI

DATE OF BIRTH: 04/20/1968

REFERRING PHYSICIAN: . . .

DATE OF SERVICE: 02/14/2014

REASON FOR EXAM: LBP with movement

EXAM: RADIOGRAPH OF THE LUMBAR SPINE

Technique: AP and lateral views of the lumbar spine are submitted.

Prior studies: No prior studies are submitted.

Findings: There is loss of the normal lumbar lordosis and mild levoscoliosis, consistent with muscular spasm. There is degenerative disc disease L3-4 through L5-S1 with narrowing of intervertebral disc spaces and marginal osteophytes. There is 2 mm of degenerative retrolisthesis of L5 on S1. There is no evidence of acute bony injury. The SI joints are normal. The paravertebral soft tissues are normal.

Impression: 1. Degenerative disc disease with lumbar spasm. 2. Spondylosis with degenerative grade 1 retrolisthesis of L5 on S1.

Recommendation: Follow up as clinically indicated. ✓

Transcribed: 02/17/2014 08:32 AM Dineen, Timothy,

Verified By: 02/17/2014 08:32 AM Dr. Timothy Dineen, M.D.

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R. LAFONTANT, MD
UNION CI/CORIZON

2-21-14