

Dear Attorney General Jeff Landry of the Louisiana Department of Justice,

I am writing in concern and outrage over the unconstitutional treatment of Michael Young, #456140, at the hands of correctional officers and prison staff at B.B. Rayburn Correctional Center in Angie, Louisiana. **In response to Michael's abuse, detailed below in this letter, it is imperative that the Louisiana Department of Justice launch a full-scale investigation of Michael's treatment at Rayburn Correctional Center immediately. I urge you to fulfill your commitment to public service as Attorney General by investigating the violent human rights violations occurring at Rayburn Correctional Center.**

Since 2015, Mr. Young has been subjected to a range of unconstitutional and cruel treatments at Rayburn Correctional Center. In the most egregious instances, Mr. Young has endured sexual assault, inadequate mental health care, and denial of access to books and legal resources. In retaliation for filing grievances against prison officials, Mr. Young has been punitively placed in administrative segregation and extended lockdown, unjustly placed on suicide watch, and exposed to physical assault through the denial of protective custody by Rayburn's administration.

During his incarceration, Mr. Young has been denied adequate mental health care and has been punitively placed in administrative segregation when he should have received medical care from a mental health professional (according to human rights groups, this is equivalent to psychological torture). In 2015, Mr. Young experienced an acute mental health crisis concurrent with the death of his mother, and was punished with solitary confinement and loss of unearned good behavior time rather than appropriate mental health care. Rayburn Correctional Center lacks an on-site mental health professional, and therefore did not have anyone on hand who could evaluate, diagnose, or treat Mr. Young. Mr. Young was unconstitutionally disciplined by Rayburn's administration (forced to sleep on a steel bunk, lost three years' worth of good time). Rayburn's reliance upon punishment as a response to mental health crises among inmates is cruel, inhumane, and unacceptable.

In 2015, Mr. Young filed a Prison Rape Elimination Act (PREA) grievance against Sgt. Jules Herbert. As punishment for his mental health crisis, Mr. Young was placed on extreme 2 point suicide watch. While fully restrained on a steel bunk, Mr. Young was verbally harassed and sexually assaulted by Sgt. Herbert. As Herbert sexually violated Mr. Young, who was unable to defend himself, another officer (who has since been fired for other violations) enabled the assault by blocking a nearby security camera. In retaliation for the PREA grievance, Sgt. Herbert accused Mr. Young of being a "snitch" and intentionally made Mr. Young the target of violence from other prisoners. Rayburn's administration has repeatedly denied Mr. Young's requests for protective custody, and consequently continues to place his life in immediate danger. Mr. Young currently has a lawsuit against twelve prison officials for failure to protect him from this excessive violence.

In letters sent from Rayburn, Mr. Young has alluded to further measures by the prison administration to retaliate against and harass him since the PREA grievance in 2015. He alleges a series of false disciplinary rule violations, officials being "pat on the back" or promoted for participating in his harassment, and his living space and private possessions (including his legal paperwork) being unconstitutionally searched, invaded, or otherwise violated on a number of occasions. Mr. Young is in possession of an ARP First Step Response from the prison, indicating that he has been protesting the violation of his First Amendment rights since at least 2016. The denial of books, newsletters, magazines, and legal publications constitutes a clear violation of Mr. Young's First Amendment rights. Mr. Young asserts that his access to the courts is being obstructed, indicating a violation of his Sixth Amendment protections.

Rayburn's use of punishment rather than adequate treatment for the mentally ill is cruel and inhumane. Sgt. Jules Herbert's use of sexual violence against Michael Young is abhorrent. Furthermore, in the aftermath of Mr. Young's medical neglect and sexual trauma, the Rayburn prison administration sanctions ongoing forms of violence against Mr. Young. The fact that Rayburn's administration facilitates Mr. Young's continued abuse is an outrage, and I demand an end to it immediately.

In solidarity with Mr. Young, I am writing to urgently request that Rayburn Correctional Center to meet his list of demands:

List of Demands:

1. **B.B. Rayburn Correctional Center must hire one or two more doctors to deal with the prison's overloaded and backed-up medical department.** Rayburn currently has one doctor in a prison of 1,300 inmates. The consequent medical neglect of inmates is unconstitutional and must be addressed immediately.
2. **B.B. Rayburn Correctional Center must hire one or two on-site mental health professionals and one on-site psychologist.** Rayburn currently lacks this type of healthcare, and instead punishes mentally ill inmates with isolation. According to various human rights groups, this treatment is tantamount to torture. Rayburn must end this cruel and inhumane treatment of mentally ill inmates immediately.
3. **B.B. Rayburn Correctional Center must hire enough correctional staff to fill every empty position at the prison in order to ensure the safety of all inmates.** Rayburn's extreme shortage of correctional staff leads to current officers being overworked, creating an unsafe environment in the prison.
4. B.B. Rayburn Correctional Center must end the practice of punitively taking good time that has not been earned by inmates, according to *Cao v. Stadler*, 2004-0650 (La. App. 1 Cir. 5/6/05), 915 So.2d 851 (wherein the court held that only earned good time credits can be forfeited in a disciplinary action).
5. **B.B. Rayburn Correctional Center must discipline all correctional officers who violate the constitutionally protected rights of inmates.** Rayburn must immediately cease the practice of nepotism wherein Rayburn correctional officers are protected from discipline by their family members who are in positions of power at Rayburn.
6. **B.B. Rayburn Correctional Center must immediately provide protective custody to Michael Young.** Sgt. Herbert's accusations against Mr. Young, which have made him the target of violence by other inmates, continue to put his life in danger. **If Rayburn fails to grant protective custody to Mr. Young, he must be transferred to another prison immediately.**
7. **B.B. Rayburn Correctional Center must allow inmates on Level 1 and 2 extended lockdown to receive books, magazines, photographs, newspapers, and any type of legal publication in accordance with the First Amendment of the Constitution of the United States.** Rayburn must provide a notice of rejection to any person or organization whose mail is rejected by the Rayburn administration. The sender must have an opportunity to appeal the rejection.
8. **If Rayburn Correctional Center fails to meet the above demands, the facility must be SHUT DOWN for failure to operate under constitutional standards.**

I fully support Michael Young, and am outraged by his inhumane treatment at Rayburn. I urge you to take action immediately to meet the demands above.

Sincerely,