

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
TERRE HAUTE DIVISION

BRIAN MAST, MICHAEL WOODS, EUGENE)	
WELLS, on their own behalf and on behalf of a class)	
of those similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	No.
)	
J. DAVID DONAHUE, in his official capacity)	
as Commissioner of the Indiana Department of)	
Correction;)	
CRAIG HANKS, in his official capacity as)	
Superintendent of the Wabash Valley)	Complaint-Class Action
Correctional Facility,)	
)	
Defendants.)	

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Introduction

1. The Indiana Department of Correction (“DOC”) maintains within the Wabash Valley Correctional Facility the Secured Housing Unit (“SHU”), a super-maximum penal facility which functions as a disciplinary segregation unit for DOC prisoners who have received at least two years of disciplinary segregation time and are deemed to be inappropriate to house elsewhere within the DOC. A significant number of prisoners in the SHU are mentally ill, and confining these prisoners in the conditions of extreme social isolation and sensory deprivation that exist in the SHU violates the Eighth Amendment to the United States Constitution. Injunctive and declaratory relief is sought for the prisoners bringing this action as well as for a class of those similarly situated.