

June 26, 2006

Commissioner George Little
Tennessee Department of Corrections
320 6th Avenue North
6th Floor, Rachel Jackson Building
Nashville, TN 37243

AMERICAN CIVIL
LIBERTIES UNION
FOUNDATION
OF TENNESSEE

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Hon. Ron Davis
District Attorney General
P.O. Box 937
Franklin, TN 37065

Hon. Paul G. Summers
Attorney General
425 5th Avenue
Nashville, TN 37243

Hon. James K. Vines
United States Attorney
110 Ninth Avenue, South
Suite A961
Nashville, TN 37203

**Re: Request to inspect and copy public records pursuant to the
Tennessee Public Records Act**

Dear Messrs. Little, Davis, Summers, and Vines:

By this letter, I request access to, and a copy of, public records in your possession, custody, or control, pursuant to the Tennessee Public Records Act, T.C.A. § 10-7-503(a). This Act gives me, as a citizen and resident of the State of Tennessee, the right to prompt access to public records for the purposes of inspection and copying.

In regards to Mr. Vines, my request under this Act only pertains to any state, county, or municipal records or documents within the possession or control of the U.S. Attorney's Office, a governmental agency within the State of Tennessee.

As used in this request, the terms "record" and "document" mean any medium upon which information can be recorded or retrieved. They include the original, all drafts, and each non-identical copy of any writings or graphic matter of any kind, whether typewritten, printed, handwritten, audio taped, videotaped, filmed,

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or produced by any other means whatsoever. The term "document" includes, but is not limited to, any paper, file, or correspondence; any intra-office or intra-agency communication; any inter-office or inter-agency communication; any report, written rule, regulation, policy, or procedure; any record of any interview, meeting or conference; and any book, pamphlet, periodical, memorandum, contract, invoice, bill, order, form, receipt, financial statement, accounting entry, diary, personal calendar, telex, telegram, cable, report, record, agreement, study, handwritten note, draft, working paper, chart, tabulation, laboratory record, map, diagram, drawing, sketch, graph, index list, tape, photograph, microfilm, microfiche, data sheet, or computer software. The term "document" refers to those items in your possession, custody, or control, or those items which were, but are no longer, in your possession, custody, or control.

The following documents are requested:

1. All records and documents connected with or arising from the Order entered by Judge William S. Russell on June 25, 1996 (attached hereto), instructing the District Attorney General and State Attorney General to notify the Commissioner of Corrections, the United States Attorney, and the District Attorneys General to investigate the shocking statements in the June 22, 1996 affidavit of Sgt. Dale Hunt (attached hereto).
2. All records and documents connected with or arising from any investigation into the allegations made by Sgt. Dale Hunt in his affidavit dated June 22, 1996; and all records and documents relevant to any of the following allegations:
 - (a) that Richard Taylor was denied meals while in the custody of the Department of Corrections;
 - (b) that Richard Taylor was "hit on the back of the head," "smacked," "hit on the head with a billy club," or otherwise physically harassed or abused while in the custody of the Department of Corrections;
 - (c) that Richard Taylor was verbally harassed or abused while in the custody of the Department of Corrections;
 - (d) that Richard Taylor was denied recreation or otherwise denied opportunities to leave his cell while in the custody of the Department of Corrections;
 - (e) that Richard Taylor's clothes were "ripped up," and that he was allowed to "sit in his cell naked for months" while in the custody of the Department of Corrections;
 - (f) that Richard Taylor was denied showers and allowed to "rub stool and urine all over his hair and body" while in the custody of the Department of Corrections;

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(g) that Richard Taylor was allowed to ingest his own stool and urine while in the custody of the Department of Corrections;

(h) that Richard Taylor was subjected to heavy water blasts from the air chamber behind his cell while in the custody of the Department of Corrections;

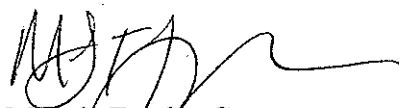
(i) that Richard Taylor was allowed to set fire to his cell, and that officers fueled the fire by "helping it along," while Mr. Taylor was in the custody of the Department of Corrections.

If you claim that any document or portion thereof is exempt from inspection under T.C.A. § 10-7-504, or any other statute or judicial decision, as to each document or portion you claim to be exempt, please state the basis for the exemption, and identify the document or portion by date; by sender, recipient, or author; and by a description of the contents sufficiently detailed to enable an independent evaluation of the claimed exemption.

If any record is otherwise withheld for any reason, please indicate the type of record withheld, the title or style of the record, the length or size of the record, the author of the record, a description of the subject matter of the record, the file(s) or other places where the record (or copies thereof) may be located, and the reason(s) the record is being withheld.

Pursuant to state law, I request a copy of these public records be forwarded to the address indicated on this letter at the earliest possible time after your receipt of this request. I agree to pay any reasonable copying and postage fees.

Sincerely,



Melody Fowler-Green
Staff Attorney