

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JEFFREY BARHAM, *et al.*

Plaintiffs,

v.

CHARLES RAMSEY, *et al.*

Defendants.

Civ. Action No. 02-02283 (EGS)(AK)

AFFIDAVIT OF NICOLE PRICHARD DJEDDAOUI

1. I certify that I am over eighteen years of age and am competent to testify to the following based on personal knowledge.
2. On September 27, 2002, I was riding my bicycle around Washington, D.C. when I found myself amidst a group of bicycle protesters. I was forced into Pershing Park, and falsely detained and arrested.
3. After I was arrested and put on a bus for many hours, I was taken to the gymnasium of the Institute for Police Science at Blue Plains.
4. I was flex-cuffed with my right wrist to my left ankle.
5. I was left in this position for 20 hours.
6. During this time, being cuffed wrist to ankle for 20 hours caused me to experienced muscular aching in my lower back and shoulders. My buttocks were sore as a result of having to be sitting for so many hours.
7. While in the gymnasium, my back and shoulders may have hurt less if I had had some back support, but I was assigned to sit on a thin mat in the middle of the gymnasium, and

it was made clear by police officers that we had to stay on the mat we were assigned to.

8. My wrist and ankle were cuffed together thereby causing chaffing. When I tried to change positions to make myself more comfortable, the movement would pull on the cuffs, causing them to dig into my skin. This caused red scratches on my wrist and ankle, and caused indentations.
9. The pain in my wrist and ankle persisted when I tried to sleep. The only way to sleep was to roll onto my side, put my right wrist in between my knees, and curl up into a ball. Even in this position, there was not enough distance between my wrist and ankle, and my wrist and ankle would naturally try to pull away from thereby causing persistent pain. The pain prevented me from sleeping more than 10 to 15 minutes before being awoken.
10. After I was released, I experienced soreness in my back, shoulders, wrists, ankles and buttocks for 2 to 3 days.
11. I certify under the penalty of perjury that the foregoing is true and correct. Executed on January 11, 2006.


Nicole Prichard Djeddaoui