

FILED

2006 FEB 16 PM 12:52

AFFIDAVIT OF TERESA HAZELWOOD

MICHAEL R. ROOPER, CLERK

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

_____ D.C.

Comes now Teresa Hazelwood, and having been duly sworn, hereby deposes and states as follows:

1. I am a citizen and resident of Nashville, Davidson County, Tennessee and have been so at all times relevant to this litigation;
2. I am presently employed by the Veteran's Administration as a Licensed Practical Nurse and have been so since November 2004;
3. On or about September 2004 I was hired by CCA as a Licensed Practical Nurse at the Harding Road women's facility;
4. Prior to working at Correction Corporations of America (CCA), I worked for Lois M. Deberry Special Needs facility for approximately four and half years;
5. During my first two weeks with CCA, I participated in an orientation process. As part of orientation, I shadowed several nurses during their daily routine.
6. After orientation, I was assigned to a regular work shift. Generally, my shifts were in the evening.
7. I first met Meredith Manning on or about October 19, 2004. I believe that I first met her when I was directed to get a urine sample.
8. At the time, she was locked in the medical wing of the facility. She was covered in blood and sweat and her hair was matted. She also appeared very thin and pale.
9. I saw rows of what appeared to be bloody sanitary napkins on the low wall in her cell.

10. I remember bringing Meredith a pan of ice and water because she did not have any water available to her in the cell. I remember it being a pan because I personally went to the kitchen to retrieve it.
11. On or about October 20, 2004, I came to work in the evening and inquired about Meredith. I was told that she had been taken to the hospital that morning and lost the baby;
12. I decided to leave CCA due to the terrible conditions and mistreatment of prisoners which I observed during my employment.
13. The facility's medical unit was understaffed and overworked for the number of prisoners, preventing proper medical care of all of the prisoners.
14. The medical staff was overworked and unable to attend to the needs of the prisoners. It was understood by many employees that CCA's medical treatment of prisoners was in violation of the law.
15. The facility often relied on non-medical personnel to make medical decisions for prisoners.
16. One of my co-workers, Doug Taylor (also an LPN at CCA), stated to me that CCA's policies put him at risk and that he felt he had been "dodging bullets" with the continued improper medical treatment and care of prisoners "for years."
17. One example of such indifference and improper care is that inmates were often given medical screenings and physicals in large groups. Inmates would be gathered together and asked to "perform" the activities of a physical, such as touching toes or bending over. Inmates were then asked as a group, to disclose out loud any private medical problems or issues.
18. A second example is the treatment of inmates with MRSA (Methicillin Resistant Staph Aureus). The infected inmates were kept together in one room, away from the other

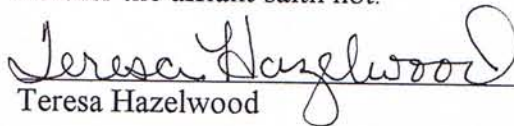
inmates. This "infection room" was also poorly staffed, and the women were treated with no respect. These prisoners had no privacy for dressing changes or for medical consultation. These dressing changes were not done with regularity and charting (of treatments) was never complete.

18. I was so shocked by the treatment of Meredith and other prisoners like her that I made a promise to myself to remember her name and to try to locate her later to see if she was all right. I remembered her name but never got around to following-up on my desire.

19. On October 1, 2005, I was reading the *Tennessean* newspaper and saw the news article on Meredith. I recognized her name immediately and told my brother that this was the same girl that I had met at CCA who was treated so badly. I had previously told my brother, as well as other family members and friends, about this horrible situation. I did not recognize her picture as she was covered in blood and sweat the last time I had seen her.

20. I have worked in nursing and corrections for many years. CCA's continuing mistreatment of prisoners is the worst I have ever witnessed, and I believe that Meredith Manning's treatment is merely one incident in a culture of shortchanged and sloppy medical care.

Further the affiant saith not.


Teresa Hazelwood

Sworn to and subscribed before me this

15 day of Feb, 2006


NOTARY PUBLIC

My commission expires: Nov 2007



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FILED

IN THE THIRD CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

MEREDITH MANNING)
)
 Plaintiff,)
)
 vs.)
)
 CORRECTIONS CORPORATION)
 OF AMERICA,)
)
 Defendant.)

2007 JUN 15 PM 12: 19

RICHARD R. BOOKER, CLERK

Civil Action No. 05C-2608 *Adell*

JURY DEMAND

AFFIDAVIT OF TERESA G. HAZELWOOD, L.P.N.

STATE OF TENNESSEE)
)
 COUNTY OF DAVIDSON)

The undersigned, Teresa G. Hazelwood, after first being duly sworn according to law, does hereby state as follows:

1. I am a licensed practical nurse, duly licensed to practice nursing in the State of Tennessee (license No. 24980). I was licensed and practicing nursing in Tennessee in 2004 and in the year prior to 2004. I have been licensed since November 30, 1979. I am presently employed by the Veteran's Administration as a licensed practical nurse and have been so employed since November 2004.

2. I was hired by Corrections Corporation of America as an L.P.N. in September 2004. I was employed at CCA in October 2004 at the time of the treatment given to Ms. Manning.

3. I have previously submitted an affidavit in this case. I am submitting this second affidavit related to the question or issue of training of nursing personnel at CCA's facility. As I stated in my earlier affidavit I have worked in nursing and corrections for many years.

4. CCA wholly failed to train the nursing staff at the CCA Metro Detention Center (where Ms. Manning was an inmate) concerning care and treatment of pregnant prisoners. The orientation and training process did not address in any way, shape or form, any policy, procedure or protocol for dealing with the special health problems of pregnant women, particularly bleeding in pregnancy.

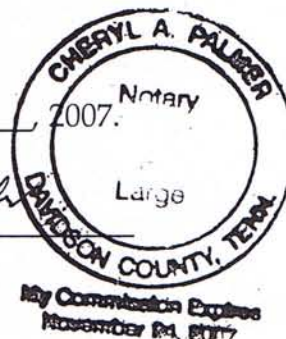
5. The nursing staff were not trained in methods for recognizing medical complications associated with pregnancy, including the training to recognize when referral to a physician or specialist was necessary. The Nursing staff were not trained to recognize the signs and symptoms of complications in pregnancy, including bleeding, pre-term labor and were not trained on how to react appropriately to such symptoms and risks.

6. Further Affiant saith not.

Teresa G. Hazelwood LPN
Teresa G. Hazelwood, L.P.N.

SWORN and subscribed to before me on this 14th day of June, 2007.

Cheryl Palmer
NOTARY PUBLIC



My Commission Expires November 24, 2007