

# APPENDIX A

Redacted and Filed Under Seal

## **Todd Randall Wilcox, MD, MBA, FACCP**

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### ADDRESS:

EMPLOYMENT: **Chief Executive Officer**, Wellcon, Inc.  
May 1996 to present

**Medical Director**, Salt Lake County Jail System  
May 1996 to present

**Attending Physician**, After Hours Medical  
August 2001 to present

**Senior Consultant**, Phase 2 Consulting  
January 2003 to December 2009

**Medical Director**, Maricopa County Jail System  
November 2004 to February 2006

**Attending Physician**, Wasatch Physician Services  
July 1996 to January 2000

**Attending Physician**, State of Utah Department of Corrections  
August 1997 to January 1999

**Staff Physician**, Salt Lake County Jail  
June 1994 to May 1996

EDUCATION: M. B. A.  
**University of Utah David Eccles School of Business**  
Salt Lake City, UT  
September 1996 to June 1998

Residency in Orthopaedic Surgery  
**University of Utah**  
July 1993 to July 1996

Internship in General Surgery  
**University of Utah**  
July 1992 to June 1993

M.D.  
**Vanderbilt University School of Medicine**  
Nashville, TN  
August 1988 to May 1992

B.S.  
**Duke University**  
Durham, NC  
Major: Biological Psychology  
August 1984 to May 1988

MEDICAL  
LICENSURE: Utah  
Arizona

BOARD  
CERTIFICATIONS: American Board of Urgent Care Medicine—certification by exam  
2006, recertified by exam 2014 and 2020

ADVANCED  
CERTIFICATIONS: Fellow, American College of Correctional Physicians--2015  
American Academy of HIV Medicine—2009, 2013 recertified by  
exam  
Advanced Certified Correctional Health Care Provider (CCHP-  
A)—certification by exam 2007, recertified 2015  
Advanced Certified Correctional Health Care Physician (CCHP-  
P)—certification by exam 2015  
Buprenorphine certified--2013

FACULTY  
APPOINTMENTS: Medical School Admissions Committee, University of Utah School  
of Medicine  
Faculty Instructor, Correctional Crisis Intervention Team  
Academy, Salt Lake County, UT  
Adjunct Instructor of Medicine, University of Utah School of  
Medicine  
Adjunct Professor of Chemistry, Salt Lake Community College  
Faculty Instructor, University of Utah School of Nursing

PROFESSIONAL  
APPOINTMENTS: Past-President, American College of Correctional Physicians,  
2017-present

President, American College of Correctional Physicians, 2015-2017  
Chairman, Physician Certification Committee, National Commission on Correctional Health Care, 2012-2013  
Board of Directors, National Commission on Correctional Health Care—Certified Correctional Healthcare Professional Board  
Chairman, Electronic Medical Records Taskforce for the National Commission on Correctional Healthcare, 2002  
Treasurer, Society of Correctional Physicians, 2012  
Medical School Admissions Committee, University of Utah School of Medicine, 2012-13

HONORS: Armond Start Award from American College of Correctional Physicians, 2019  
Medical Director for National Commission on Correctional Healthcare Facility of the Year, 2001  
Angier B. Duke Memorial Scholarship  
Boettcher Foundation Scholar  
Jostens Foundation Scholar

PROFESSIONAL MEMBERSHIPS: American Medical Association  
American College of Emergency Physicians  
American Jail Association  
Society of Correctional Physicians  
American Correctional Health Services Association  
American Academy of Urgent Care Medicine  
American Academy of HIV Medicine

CORRECTIONAL CONSULTING: American Jail Association  
National Institute of Corrections  
California Department of Corrections  
Maricopa County Correctional Health Care, AZ  
Pima County Department of Institutional Health, Tucson, AZ  
Santa Clara County Jail System, CA  
Washington County Jail, UT  
Utah County Jail, UT  
Seattle-King County Jail System, WA  
Mississippi Department of Corrections  
National Commission on Correctional Healthcare

- PUBLICATIONS: Wilcox, TR. President's Column. *Corrdocs*. Chicago: American College of Correctional Physicians, Spring 2016. 19:1, 2.
- Wilcox, TR. How I Practice: Assessing Weight Loss in Correctional Facilities. *Corrdocs*. Chicago: American College of Correctional Physicians, Spring 2016. 19:1, 8.
- Wilcox, TR. Poising the College for Continued Success. *Corrdocs*. Chicago: American College of Correctional Physicians, Winter 2015. 18:4, 4.
- Wilcox, TR. How I Practice: Managing Diabetics on Commissary Day. *Corrdocs*. Chicago: American College of Correctional Physicians, Winter 2015. 18:4, 9.
- Wilcox, TR. Dealing with Orthopedic Hardware. *Corrdocs*. Chicago: Society of Correctional Physicians, Fall 2014. 17:3, 4-5.
- Wilcox TR. Critical Commandments in Correctional Health Care: Part 3. *CorrectCare*. Chicago: National Commission on Correctional Health Care, Fall 2013. 27:4, 16.
- Wilcox TR. Critical Commandments in Correctional Health Care: Part 2. *CorrectCare*. Chicago: National Commission on Correctional Health Care, Summer 2013. 27:3, 19.
- Wilcox TR. Critical Commandments in Correctional Health Care: Part 1. *CorrectCare*. Chicago: National Commission on Correctional Health Care, Spring 2013. 27:2, 20.
- Wilcox TR. Developing an Effective Alcohol Withdrawal Protocol. *Correctional Health Care Report*. Civic Research Institute, Inc., May 2003: 49-50, 63-64.
- Goble EM, Kane SM, Wilcox TR, Doucette SA. Meniscal Allografts. In: McGinty JB, ed. *Operative Arthroscopy*. Philadelphia: Lippincott-Raven Press; 1996: 317-31.
- Goble EM, Kane SM, Wilcox TR, Olsen RE. Advanced Arthroscopic Instrumentation. In: McGinty JB, ed. *Operative Arthroscopy*. Philadelphia: Lippincott-Raven Press; 1996: 7-12.
- Wilcox TR, Goble EM. Indications for meniscal allograft reconstruction. *American J of Knee Surgery* 9: 35-6, 1996.

Wilcox TR, Goble EM, Doucette SA. Goble technique of meniscus transplantation. *American J of Knee Surgery* 9: 37-42, 1996.

Goble EM, Downey DJ, Wilcox TR. Positioning of the tibial tunnel for ACL reconstruction. *J Arthroscopy* 12: 415-18, 1995.

Morris JA, Wilcox TR, Reed GW, et al. Safety of the blood supply: surrogate testing and transmission of hepatitis C in patients after massive transfusion. *Annals of Surgery* 219: 517-26, 1994.

Wilcox TR, Morris JA, Green NE. Case report: Pediatric ankle fractures. *Tennessee Medical Journal*. 85: 217-19, 1992.

Morris JA, Wilcox TR, Frist WH. Pediatric organ donation: the paradox of organ shortage despite the remarkable willingness of families to donate. *Pediatrics* 89: 411-15, 1992.

Morris JA, Wilcox TR, Noreuil T, and Frist WH. Organ donation: a university hospital experience. *Southern Medical Journal* 83: 884-88, 1990.

Cogbill TH, Moore EE, Feliciano DV, Wilcox TR, et al. Conservative management of duodenal trauma: a multicenter perspective. *Journal of Trauma* 30: 1469-75, 1990.

Morris JA, Moore EE, Feliciano DV, Wilcox TR, et al. Post-traumatic renal failure: a multicenter study. *Journal of Trauma* 31: 1584-90, 1991.

Wilcox TR, contributing author to The Admissions Essay by Helen W. Power and Robert DiAntonio. Lyle Stuart, Inc., Seacausus, NJ, 1987, pp. 116-7, 197, 206-8, 219-20.

PRESENTATIONS: National Commission on Correctional Healthcare Jail Standards Course  
Abdominal Pain  
Chronic Disease Management in Correctional Facilities  
Pain Management in Correctional Healthcare  
Alcohol Withdrawal Syndrome  
Drug Withdrawal Syndromes  
Effective Correctional Medical / Mental Health Intake Screening  
Endocrine Emergencies  
Excited Delirium and Sudden In-Custody Death Syndrome  
Hematologic Emergencies

Safe Restraint and Intensive Medical Management Practices  
Medical Effects of Mental Health Medications  
Neurological Emergencies  
Effective Nursing Triage in Correctional Settings  
Orthopedic Emergencies  
Point of Care Laboratory in Correctional Healthcare  
Managing Hypertension in Correctional Healthcare  
Seizure Assessment and Treatment  
How To Work Well with EMS  
Effective Wound Care Practices in Correctional Healthcare  
14-day Assessments in Corrections  
Electronic Health Records for Institutional Medicine

EXPERT  
PANELS:

Rand Corporation Expert for Modified Delphi Process to  
Determine Quality Measures for Correctional Healthcare—June  
2009

American Jail Association / National Institute of Corrections  
Expert for Mental Health in Jails Focus Group and National  
Satellite Broadcast—June 2009

PATENTS:

United States Patent 5,681,289  
Chemical Dispensing System  
Issued October 28, 1997

United States Patent 5,891,101  
Chemical Dispensing System Methodology  
Issued April 17, 1999

United States Patent 5,895,375  
Chemical Dispensing System Components  
Issued April 17, 1999

# APPENDIX B

**Confidential Report of Dr. Todd Wilcox**  
**Appendix B**

List of Expert Testimony, 2017-Present

Case	Date	Location	Topic	Role
<i>Parenti v. CFMG</i>	2017	CA	Respiratory failure	Plaintiff Expert
<i>Mosqueda v. GA DOC</i>	2017	GA	Pancreatitis / DKA	Plaintiff Expert
<i>Neuroth v. Mendocino County</i>	2018	CA	Mental Health use of force	Plaintiff Expert
<i>Bennett (Manos) v. Carter County et al.</i>	2018	OK	Mental health neglect	Plaintiff expert
<i>Estes v. Corizon</i>	2018	AZ	Chronic disease mgmt/system issues	Plaintiff expert
<i>Wright v. Wexford</i>	2018	AZ	Opiate withdrawal / sudden death	Plaintiff expert
<i>Barrier v. Beauzile</i>	2019	FL	Opiate overdose	Defense Expert
<i>Buchanan v. Turnkey Health</i>	2019	OK	Epidural abscess	Plaintiff Expert
<i>Ellis v. Ottawa County</i>	2019	OK	Pneumonia	Plaintiff Expert
<i>Wright v. Wexford (trial)</i>	2019	AZ	Opiate withdrawal / sudden death	Plaintiff Expert
<i>Bowles v. ACH</i>	2019	KY	Sepsis / brain abscess	Defense Expert
<i>Nadeau v. Shipman</i>	2020	ND	Suicide	Defense Expert
<i>Floyd v. Corizon</i>	2021	AZ	Sudden cardiac death	Plaintiff Expert
<i>Clemons v. Wexford</i>	2021	IL	Bunions and shoes	Defense Expert

# APPENDIX C

Redacted and Filed Under Seal

## Expert Declaration of Dr. Todd Wilcox

### Appendix C

## Medical Records

	Laura Redmond 166546
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Kendall Johnson 189644	
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Mortality Reviews and Medical Examiner Reports

ADCM1608400-1608406	Mortality Review
ADCM1615615-1615618	Mortality Review
ADCM1589770-1589775	Mortality Review

ADCM1580645-1580652	Mortality Review
MER000506-509	ME Report
ADCRR00000001-4	Mortality Review
ADCRR00000005-8	Mortality Review
ADCM1591245-1591250	Mortality Review
ADCRR00000033-36	Mortality Review
MER000075-88	ME Report
ADCM1652229-1652234	Mortality Review
ADCRRM0026146-26149	Mortality Review
ADCM1608411-1608420	Mortality Review
ADCM1651463-1651466	Mortality Review
ADCRR00088395-88402	Mortality Review and ME Report
ADCRR00000013-16	Mortality Review
ADCRRM0026150-26153	Mortality Review
MER000484-487	ME Report
ADCRR00000025-28	Mortality Review
ADCM1578118-1578125	Mortality Review
ADCRR00000029-32	Mortality Review
ADCRRM00000026-29	Mortality Review
MER000169-172	ME Report
ADCRRM0012715-12718	Mortality Review
MER000242-246	ME Report
ADCRR00088403-88410	Mortality Review and ME Report

ADCM1615624-1615627	Mortality Review
ADCM1584294-1584299	Mortality Review
ADCRRM0019617-19620	Mortality Review
ADCRRM0026194	Mortality Review Replacement Page
ADCRRM0026195-26198	Mortality Review
MER000526-533	ME Report
ADCRR00000037-40	Mortality Review
MER000455-458	ME Report
ADCRR00088414-88420	Mortality Review and ME Report
MER000706-709	ME Report
ADCM1603885-1603893	Mortality Review
ADCM1608432-1608440	Mortality Review
MER000247-255	ME Report
ADCRRM0012719-12722	Mortality Review
MER000777-780	ME Report
ADCM1615628-1615631	
ADCM1669320-1669324	Mortality Review
MER000188-192	ME Report
ADCRRM00005581-5584	Mortality Review
ADCM1623203-1623209	Mortality Review
ADCM1575247-1575250	Mortality Review
ADCM1651471-1651474	Mortality Review
MER000256-259	ME Report

ADCRRM0004662-4665	Mortality Review
ADCRRM0000018-21	Mortality Review
MER000051-59	ME Report
ADCM1575449-1575454	Mortality Review
ADCM1603908-1603913	Mortality Review
ADCRRM0019637-19640	Mortality Review
ADCM1575459-1676463	Mortality Review
ADCRRM0012735-12738	Mortality Review
MER000698-701	ME Report
ADCM1570724-1570728	Mortality Review
ADCRR00000061-64	Mortality Review
ADCRR00088293-88300	Mortality Review and ME Report
ADCM1575464-1575467	Mortality Review
ADCM1603925-1603928	Mortality Review
ADCRR00088421-88436	Mortality Review and ME Report
ADCM1603929-1603932	Mortality Review
ADCRRM0026207-26210	Mortality Review
MER000011-14	ME Report
MER000015-18	Amended ME Report
ADCRRM0026211-26214	09613 Mortality Review
MER000435-441	ME Report
ADCRR00088437-88444	Mortality Review and ME Report

ADCRR00088445-88461	Mortality Review and ME Report
MER000229-241	ME Report
ADCRR00088462-88469	Mortality Review and ME Report
ADCM1623210-1623213	Mortality Review
MER000200-204	ME Report
ADCRR00088320-88323	Mortality Review
ADCRR00088324-88328	ME Report
MER000802-806	ME Report
ADCM1584246-1584249	Mortality Review
ADCRR00000093-97	Mortality Review
ADCRRM0019657-19660	Mortality Review
MER000678-681	ME Report
ADCM1669335-1669338	Mortality Review
MER000564-577	ME Report
ADCRR00000098-101	Mortality Review
MER000597-600	ME Report
ADCRRM0019661-19664	Mortality Review
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ADCM1615638-1615641	Mortality Review
ADCM1618284-1618290	Mortality Review
ADCM1669343-1669346	Mortality Review
MER000622-625	ME Report
ADCRR00000170-183	Psychological Autopsy

MER000710-718	ME Report
ADCRRM0019673-19676	Mortality Review
MER000325-329	ME Report
ADCM1589803-1589808	Mortality Review
MER000476-479	ME Report
MER000480-483	Amended ME Report
ADCM1613849-1613852	Mortality Review
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ADCRRM0026231-26234	Mortality Review
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MER000543-546	ME Report
ADCRRM0026235-26238	Mortality Review
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MER000582-585	ME Report
ADCM1589813-1589820	Mortality Review
ADCRRM0019682-19685	Mortality Review
ADCRR00000110-113	Mortality Review
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MER000416-418	ME Report
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MER000193-196	ME Report
ADCRR00000114-117	Mortality Review
ADCM1578112-1578117	Mortality Review

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MER000807-816	ME Report
ADCRR00000118-121	Mortality Review
MER000105-108	ME Report
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MER000208-212	ME Report
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ADCRR00088527088541	Mortality Review and ME Report
ADCM1629761-1629766	Mortality Review
MER000740-743	ME Report
ADCM1598095-1598101	Mortality Review

CQI Meeting Minutes

ADCRR00098881-98921	ASPC-Douglas, January 2020
ADCRR00098922-98966	ASPC-Eyman, January 2020
ADCRR00098967-99120	ASPC-Florence, January 2020

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ADCRR00056507-56540	ASPC-Perryville, May 2021
ADCRR00056541-56587	ASPC-Phoenix, May 2021
ADCRR00056588-56663	ASPC-Safford, May 2021
ADCRR00056664-56719	ASPC-Tucson, May 2021
ADCRR00056720-56730	ASPC-Winslow, May 2021
ADCRR00056731-56771	ASPC-Yuma, May 2021
ADCRR00061590-61619	ASPC-Douglas, June 2021

ADCRR00061620-61741	ASPC-Eyman, June 2021
ADCRR00061742-61821	ASPC-Florence, June 2021
ADCRR00061822-61873	ASPC-Lewis, June 2021
ADCRR00061874-61886	ASPC-Perryville, June 2021
ADCRR00061887-61957	ASPC-Phoenix, June 2021
ADCRR00061958-61999	ASPC-Safford, June 2021
ADCRR00062000-62031	ASPC-Tucson, June 2021
ADCRR00062032-62042	ASPC-Winslow, June 2021
ADCRR00062043-62151	ASPC-Yuma, June 2021
ADCRR00062152-62183	ASPC-Douglas, July 2021
ADCRR00062184-62288	ASPC-Eyman, July 2021
ADCRR00062289-62464	ASPC-Florence, July 2021
ADCRR00062465-62538	ASPC-Lewis, July 2021
ADCRR00062539-62550	ASPC-Perryville, July 2021
ADCRR00062551-62576	ASPC-Phoenix, July 2021
ADCRR00062577-62612	ASPC-Safford, July 2021
ADCRR00000856-883	ASPC-Tucson, July 2021
ADCRR00062613-62623	ASPC-Winslow, July 2021
ADCRR00062624-62630	ASPC-Yuma, July 2021
ADCRR00136543-136577	ASPC-Douglas, August 2021
ADCRR00136578-136697	ASPC-Eyman, August 2021
ADCRR00136698-136803	ASPC-Florence, August 2021
ADCRR00136804-136931	ASPC-Lewis, August 2021
ADCRR00136932-136942	ASPC-Perryville, August 2021

ADCRR00136943-136958	ASPC-Phoenix, August 2021
ADCRR00136959-137005	ASPC-Safford, August 2021
ADCRR00137006-137040	ASPC-Tucson, August 2021
ADCRR00137041-137052	ASPC-Winslow, August 2021
ADCRR00137053-137139	ASPC-Yuma, August 2021

Court Orders and Filings

946-1, Ex. 1	6/18/14	Confidential Report of Todd Randall Wilcox, November 8, 2013 (Under Seal)
946-1, Ex. 3	6/18/14	Confidential Supplemental Report of Todd Randall Wilcox, April 2, 2014 (Under Seal)
1105	9/9/14	Notice of Service of Supplemental Expert Reports
1185	10/14/14	Stipulation
1185-1	10/14/14	Exhibits to Stipulation
1539 (redacted) 1558 (sealed)	4/11/16	Declaration of Todd R. Wilcox
1670	9/2/16	Declaration of Todd R. Wilcox, M.D.
2103	6/9/17	Declaration of Todd R. Wilcox, M.D., M.B.A.
2496	12/18/17	Declaration of Dr. Todd R. Wilcox, M.D., M.B.A.
3379	10/4/19	Report to the Court in the Matter of <i>Parsons v. Ryan, et al.</i> , Marc F. Stern, MD, MPH, Federal Rule 706 Expert
3718	8/24/20	Rebuttal Declaration of Amy June Rowley, Ph.D.
3861	2/24/21	Order
3916-1	6/21/21	Defendants' Performance Measure Charts Regarding April 2021 Compliance

3920	7/13/21	Defendants' Response to Plaintiffs' Objections to Defendants' Compliance Plan Regarding Paragraph 14 of the Stipulation and Submission of Revised Compliance Plan
3920-1	7/13/21	Exhibit 1, Language Identification Guide
4006-1, Ex. C	9/29/21	Declaration of Laura Redmond (166546)

Expert Reports Not Filed with Court

WILCOX000001-96	Second Supplemental Report of Todd Randall Wilcox, M.D. (9/8/14)
WILCOX000848-925	Expert Report of Robert Joy, 10/9/21

Information Summaries

WILCOX000108	Table of Performance Measure 11 CGAR Scores (January-July 2021)
WILCOX000109	Table of Performance Measure 13 CGAR Scores (January-July 2021)
WILCOX000110	Table of Performance Measure 35 CGAR Scores (January-July 2021)
WILCOX000111	Table of Performance Measure 37 CGAR Scores (January-July 2021)
WILCOX000112	Table of Performance Measure 44 CGAR Scores (January-July 2021)
WILCOX000113	Table of Performance Measure 46 CGAR Scores (January-July 2021)
WILCOX000114	Table of Performance Measure 47 CGAR Scores (January-July 2021)
WILCOX000115	Table of Performance Measure 48 CGAR Scores (January-July 2021)

WILCOX000116	Table of Performance Measure 50 CGAR Scores (January-July 2021)
WILCOX000117	Table of Performance Measure 51 CGAR Scores (January-July 2021)
WILCOX000118	Table of Performance Measure 52 CGAR Scores (January-July 2021)
WILCOX000119	Table of Medical Scores of Patients Before Death
WILCOX000120	Table of Medical Scores of Patients Housed in the IPC at ASPC-Florence
WILCOX000121	Table of Medical Scores of Patients Housed in the IPC at ASPC-Lewis
WILCOX000122	Table of Medical Scores of Patients Housed in the IPC at ASPC-Tucson
WILCOX000123	Table of Medical Scores of Patients Housed in the SNU at ASPC-Perryville

Photographs and Videorecordings

ADCRR00108128	Videorecording of Florence Site Visit	from 9/8/21 ASPC-
ADCRR00108126	Photograph of Urine in Collection Bag of from 9/8/21 ASPC-Florence Site Visit	
ADCRR00108125	Photograph of Inner Thigh of 9/8/21 ASPC-Florence Site Visit	from
ADCRR00108124	Photograph of Foot of ASPC-Florence Site Visit	from 9/8/21
ADCRR00108123	Photograph of Bottom of Foot of 9/8/21 ASPC-Florence Site Visit	from
WILCOX000107	Photograph of Bottom of Foot of 9/8/21 ASPC-Florence Site Visit (ADCRR00108123) <b>with Annotations by Dr. Wilcox</b>	from

ADCRR00108122	Photograph of Florence Site Visit from 9/8/21 ASPC-
ADCRR00108134	RN Exam Room from 9/1/21 ASPC-Lewis Site Visit
ADCRR00108135	RN Exam Room from 9/1/21 ASPC-Lewis Site Visit
ADCRR00108148	Videorecording of ASPC-Tucson Site Visit from 9/9/21
ADCRR00108146	Photograph of Stump of ASPC-Tucson Site Visit from 9/9/21
WILCOX000106	Photograph of Stump of ASPC-Tucson Site Visit (ADCRR00108146) <b>with Annotations by Dr. Wilcox</b> from 9/9/21

#### ADCRR Policies and Procedures

- ADCRR, Medical Services Technical Manual (Oct. 4, 2021), [https://corrections.az.gov/sites/default/files/documents/PDFs/tech\\_manuals/adcr-healthservicestechnicalmanual\\_100421.pdf](https://corrections.az.gov/sites/default/files/documents/PDFs/tech_manuals/adcr-healthservicestechnicalmanual_100421.pdf)
- Department Order 1101, Inmate Access to Health Care (amended Oct. 17, 2018), [https://corrections.az.gov/sites/default/files/policies/1100/1101\\_032519.pdf](https://corrections.az.gov/sites/default/files/policies/1100/1101_032519.pdf)
- Department Order 1104, Inmate Medical Records (Oct. 29, 2020), [https://corrections.az.gov/sites/default/files/policies/1100/1104\\_103020.pdf](https://corrections.az.gov/sites/default/files/policies/1100/1104_103020.pdf)
- Department Order 1104, Inmate Medical Records (effective Oct. 27, 2021), [https://corrections.az.gov/sites/default/files/policies/1100/1104b\\_effective\\_102721.pdf](https://corrections.az.gov/sites/default/files/policies/1100/1104b_effective_102721.pdf)

#### Statutes, Regulations, Rules, and Executive Orders

A.R.S. § 12-351	Costs of compliance with subpoena for production of documentary evidence; payment by requesting party; definitions
-----------------	--

A.R.S. § 32-2531	Physician assistant scope of practice; health care tasks; supervising physician duties; civil penalty
67 Fed. Reg. 41,455	U.S. Dep't of Justice, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (June 18, 2002)
45 C.F.R. § 164.524	Access of individuals to protected health information
Arizona Executive Order 2020-10	Delaying Elective Surgeries to Conserve Personal Protective Equipment Necessary to Test and Treat Patients with COVID-19, <a href="https://azgovernor.gov/governor/executive-order/2020-10">https://azgovernor.gov/governor/executive-order/2020-10</a>
Arizona Executive Order 2020-32	Requesting Exemption From Executive Order 2020-10 — Elective Surgeries, <a href="https://azgovernor.gov/governor/executive-order/2020-32">https://azgovernor.gov/governor/executive-order/2020-32</a>
R4-19-508	Standards Related to Registered Nurse Practitioner Scope of Practice (June 3, 2019), <a href="https://www.azbn.gov/sites/default/files/2020-03/RULES.Effective.June3_.2019.pdf">https://www.azbn.gov/sites/default/files/2020-03/RULES.Effective.June3_.2019.pdf</a>

### Deposition Transcripts

- Dr. Grant Phillips (Oct. 4, 2021)
- Dr. Grant Phillips (Oct. 5, 2021)
- Dr. Wendy Orm (Oct. 13, 2021)
- Larry Gann, Jr. (Oct. 13, 2021)

### Other

ADCRR00021949	ADCRR's June 2021 Staffing Variance Report
ADCRR00096790-96818	Centurion - Arizona DOC Drug Formulary (July 2021)

ADCRR00049644-49645	Inmate Grievance and Inmate Formal Grievance Response for
WILCOX000097-105	Letter from Corene Kendrick & Gabriela Pelsinger, Prison Law Office, to Timothy Bojanowski, Struck, Love, Bojanowski & Acedo, PLC, <i>Parsons v. Shinn</i> , 2:12-CV-00601, Class Member in Need of Medical Care, Florence - Central IPC, Notice of Noncompliance (Paragraph 8 of the Stipulation) (Aug. 16, 2020)
Pltfs' Trial Exh. 1976	Defendants' 10/13/21 responses to Plaintiffs' First Set of Requests for Admission
Online	Indomethacin: Drug Information from Lexicomp, UptoDate.com (last visited Oct. 2, 2021), <a href="https://www.uptodate.com/contents/indomethacin-drug-information?search=indomethacin%20Lexicomp&amp;source=search_result&amp;selectedTitle=1~150&amp;usage_type=default&amp;display_rank=1">https://www.uptodate.com/contents/indomethacin-drug-information?search=indomethacin%20Lexicomp&amp;source=search_result&amp;selectedTitle=1~150&amp;usage_type=default&amp;display_rank=1</a>
Online	Medical Problems of State and Federal Prisoners and Jail Inmates, 2011-12, U.S. Department of Justice Programs, Bureau of Justice Statistics (rev. Oct. 4, 2016), <a href="https://bjs.ojp.gov/content/pub/pdf/mpsfpi1112.pdf">https://bjs.ojp.gov/content/pub/pdf/mpsfpi1112.pdf</a>
Online	U.S. Preventive Services Task Force, Final Recommendation Statement, Hepatitis C Virus Infection in Adolescents and Adults: Screening (Mar. 2, 2020), <a href="https://www.uspreventiveservicestaskforce.org/uspstf/recommendation/hepatitis-c-screening">https://www.uspreventiveservicestaskforce.org/uspstf/recommendation/hepatitis-c-screening</a>
Online	U.S. Food & Drug Administration, Information About Medication-Assisted Treatment (MAT) (Feb. 14, 2019), <a href="https://www.fda.gov/drugs/information-drug-class/information-about-medication-assisted-treatment-mat">https://www.fda.gov/drugs/information-drug-class/information-about-medication-assisted-treatment-mat</a>

Online	U.S. Dep't of Health & Human Services, How to Find Opioid Treatment Programs? (Apr. 19, 2018), <a href="https://www.hhs.gov/opioids/treatment/index.html">https://www.hhs.gov/opioids/treatment/index.html</a>
Online	Nat'l Institutes of Health, Policy Brief: Effective Treatments for Opioid Addiction (Nov. 2016), <a href="https://www.drugabuse.gov/publications/effective-treatments-opioid-addiction">https://www.drugabuse.gov/publications/effective-treatments-opioid-addiction</a>
Online	Office of Nat'l Drug Control Policy, National Treatment Plan for Substance Use Disorder 2020 (Feb. 2020), <a href="https://trumpwhitehouse.archives.gov/wp-content/uploads/2020/02/2020-NDCS-Treatment-Plan.pdf">https://trumpwhitehouse.archives.gov/wp-content/uploads/2020/02/2020-NDCS-Treatment-Plan.pdf</a>
Online	U.S. Dep't of Health & Human Services, Substance Abuse and Mental Health Services Administration, Medication-Assisted Treatment (MAT) (Oct. 7, 2021), <a href="https://www.samhsa.gov/medication-assisted-treatment">https://www.samhsa.gov/medication-assisted-treatment</a>
Online	Traci C. Green, PhD, MSc, Jennifer Clarke, MD, and Lauren Brinkley-Rubinstein, PhD, Postincarceration Fatal Overdoses After Implementing Medications for Addiction Treatment in a Statewide Correctional System, JAMA Psychiatry 75(4) (2018), <a href="https://jamanetwork.com/journals/jamapsychiatry/fullarticle/2671411">https://jamanetwork.com/journals/jamapsychiatry/fullarticle/2671411</a>
Online	ADCRR, Admissions, Release, Confined Population Fact Sheet, <a href="https://corrections.az.gov/sites/default/files/REPORTS/Inmate_Population/inmate_popfacts_sheet_2019.pdf">https://corrections.az.gov/sites/default/files/REPORTS/Inmate_Population/inmate_popfacts_sheet_2019.pdf</a>
Online	U.S. Dep't of Health & Human Services, Individuals' Right under HIPAA to Access their Health Information 45 CFR § 164.524 (Jan. 31, 2020), <a href="https://www.hhs.gov/hipaa/for-professionals/privacy/guidance/access/index.html">https://www.hhs.gov/hipaa/for-professionals/privacy/guidance/access/index.html</a>

# APPENDIX D

Redacted and Filed Under Seal

## MEDICAL SCORES OF SELECT PATIENTS AT TIME OF DEATH

Name	No.	Score	Name	No.	Score	Name	No.	Score
		1			2			3
		1			2			3
		1			2			3
		1			2			3
		2			2			4
		2			2			4
		2			2			4
		2			3			4
		2			3			5

Source: The “Administrative – Health Records Lock” encounter entry in the eOMIS patient record. For those patients listed with an asterisk (\*), that encounter entry did not list a medical score. For those patients, the score listed in the table above is from the last encounter before their death.

**WILCOX000119**

## MEDICAL SCORES OF PATIENTS HOUSED IN IPC AT ASPC-FLORENCE

Name	No.	Score	Name	No.	Score	Name	No.	Score
		1			3			3
		1			3			4
		2			3			4
		2			3			4
		2			3			4
		2			3			5
		2			3			

Source: Medical score listed in eOMIS patient records as of 9/29/21. Mr. listed above with an asterisk (\*), died before 9/29/21; the score listed for him was his score at the time of his death.

**WILCOX000120**

## MEDICAL SCORES OF PATIENTS HOUSED IN IPC AT ASPC-LEWIS

<b>Name</b>	<b>No.</b>	<b>Score</b>	<b>Name</b>	<b>No.</b>	<b>Score</b>	<b>Name</b>	<b>No.</b>	<b>Score</b>
		2			2			4
		2			3			4
		2			3			4

Source: Medical score listed in eOMIS patient records as of 9/29/21.

**WILCOX000121**

## MEDICAL SCORES OF PATIENTS HOUSED IN IPC AT ASPC-TUCSON

Name	No.	Score	Name	No.	Score	Name	No.	Score
		1			3			4
		2			3			4
		2			3			4
		2			3			4
		2			4			5
		3			4			5
		3			4			5

Source: Medical score listed in eOMIS patient records as of 9/29/21. Mr. [redacted] and Mr. [redacted] listed above with an asterisk (\*), were both out to hospital on 9/29/21. Mr. [redacted] and Mr. [redacted] listed above with an asterisk (\*), were both out to hospital on 9/29/21. Mr. [redacted] listed above with a double asterisk (\*\*), was released from custody before 9/29/21. The score listed for him is the score listed in his last healthcare encounter entry before his release.

**WILCOX000122**

## MEDICAL SCORES OF PATIENTS HOUSED IN SNU AT ASPC-PERRYVILLE

<b>Name</b>	<b>No.</b>	<b>Score</b>	<b>Name</b>	<b>No.</b>	<b>Score</b>	<b>Name</b>	<b>No.</b>	<b>Score</b>
		2			3			3
		3			3			

Source: Medical score listed in eOMIS patient records as of 9/29/21.

**WILCOX000123**

# APPENDIX E

Redacted and Filed Under Seal



centurion



## Practitioner Consultation Report

Auth #:	OP1783852032	Date of Service:	12/4/2019
Patient:	Inmate ID:	DOB:	
Facility:	SERVICE		
ASPC LEWIS	TYPE: General Surgery	Phone: 623-386-6160	
Practitioner:	NP Morales	Practitioner Type:	Location: Stiner

\*\*\* See Attached Consultation Request for Health Services Authorized\*\*\*

For security reasons inmates must NOT be informed of recommended treatment or possible hospitalization. Due to security considerations, all recommended tests and treatments are to be scheduled by Centurion.

Review of Case (chief complaint, exam findings, etc.):

- Patient is a 58 year old male who is  
 referred with infectious lesions.  
 Patient is seeking repair.

Diagnosis and Prescription Suggestions (To be reviewed by Centurion Provider):

- Infectious lesions

Can equivalent Medication substitution be used? Yes NO Follow up Needed: Yes NO

If Follow up needed, explain:

- Patient needs infectious lesions  
 repair.

Richard J. Whitman (JRM)	<i>Richard J. Whitman</i>	12/4/19
Practitioner Name	Practitioner signature	Date:

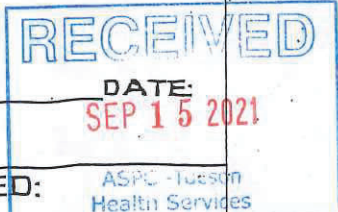
To be Completed by Centurion Provider

Action(s) Needed/ Implemented:

Centurion Provider Signature	Centurion Provider Stamp/Name	Date:
------------------------------	-------------------------------	-------



PATIENT NAME		ADC/ID#	DOB
FACILITY: <u>Win</u> ASPG-TUCSON COMPLEX		PHONE #: 520-574-0024 EXT 36375/38285	
PROVIDER: <u>Valley Urology</u>	CONSULT TYPE: <u>Rheumatology</u>	LOCATION: <u>2535 E. Roosevelt Blvd</u>	
AUTHORIZATION #:	<u>OP2635586562</u>	DATE OF SERVICE: <u>9/14/21</u>	
***SEE ATTACHED CONSULTATION REQUEST FOR HEALTH SERVICES AUTHORIZED*** FOR SECURITY REASONS, INMATES MUST NOT BE INFORMED OF RECOMMENDED TREATMENT OR POSSIBLE HOSPITALIZATION. DUE TO SECURITY CONSIDERATIONS, ALL RECOMMENDED TESTS AND TREATMENTS ARE TO BE SCHEDULED BY CENTURION.			
REVIEW OF CASE (CHIEF COMPLAINT, EXAM FINDING, ETC.) <u>PT with 8 mos. of progressive skin thickening to B/L UE, chest torso, face assoc. c Raynolds and some SOB along c superficial digital ulceration.</u>			
DIAGNOSIS AND PRESCRIPTION SUGGESTIONS: CAN EQUIVALENT MEDICATION SUBSTITUTION BE USED? YES NO <u>Recommending labs to better clarify dx, confirm suspicion of scleroderma. - will then recommend med. / Nivasef.</u>			
IS FOLLOW UP APPT NEEDED? <input checked="" type="checkbox"/> YES NO IF FOLLOW UP NEEDED, EXPLAIN: <u>2 mos.</u> <u>PT SHOULD STOP PREDNISONE</u> <u>POSS. Cellcept</u>			
PROVIDER NAME	<u>Sheetal Chhapra</u>	PROVIDER SIGNATURE	<u>Sheetal Chhapra</u>
TO BE COMPLETED BY CENTURION PRACTITIONER			
RECOMMENDATION AFTER REVIEW OF CONSULTANT'S REPORT: NO FURTHER ACTION NEEDED IMPLEMENT THE FOLLOWING			
IMPLEMENTS:			
CENTURION PROVIDER NAME		SIGNATURE	
DATE RECEIVED:		DATE SCANNED:	



FULL Progress note to follow. Will Fax to you.

Tux - 8 WILCOX001079



PATIENT NAME	ADC/ID#	DOB
FACILITY: <u>CIM</u> ASPC-TUCSON COMPLEX		PHONE #: 520-574-0024 EXT 36375/38285
PROVIDER: <u>Dr Khan</u>	CONSULT TYPE: <u>GI Eval</u>	LOCATION: <u>525 N 18th Street Phoenix, AZ</u>
AUTHORIZATION #: <u>DP2614613333</u>		DATE OF SERVICE: <u>9/3/21</u>
<p>***SEE ATTACHED CONSULTATION REQUEST FOR HEALTH SERVICES AUTHORIZED***          FOR SECURITY REASONS, INMATES MUST NOT BE INFORMED OF RECOMMENDED          TREATMENT OR POSSIBLE HOSPITALIZATION. DUE TO SECURITY CONSIDERATIONS, ALL          RECOMMENDED TESTS AND TREATMENTS ARE TO BE SCHEDULED BY CENTURION.          REVIEW OF CASE (CHIEF COMPLAINT, EXAM FINDING, ETC.)</p> <p><u>Aspirin</u> <u>MS</u></p>		
<p>DIAGNOSIS AND PRESCRIPTION SUGGESTIONS:          CAN EQUIVALENT MEDICATION SUBSTITUTION BE USED? YES NO</p> <p><u>Aspirin</u>, <u>Aspirin</u></p>		
<p>IS FOLLOW UP APPT NEEDED? YES NO          IF FOLLOW UP NEEDED, EXPLAIN:</p> <p><u>12:00 now</u> <u>(2)</u> <u>He needs PEG earlier than that &amp; I am on my down</u></p>		
PROVIDER NAME <u>Norman Khan</u>	PROVIDER SIGNATURE <u>[Signature]</u>	
TO BE COMPLETED BY CENTURION PRACTITIONER		
RECOMMENDATION AFTER REVIEW OF CONSULTANT'S REPORT:		
NO FURTHER ACTION NEEDED		IMPLEMENT THE FOLLOWING
IMPLEMENTS:		
CENTURION PROVIDER NAME _____		SIGNATURE _____ DATE: _____
DATE RECEIVED:		DATE SCANNED:

RECEIVED

SEP 07 2021

ASPC -Tucson  
Health Services

WILCOX001080



Reference # OP 1886680016		Date of Service 4/15/2020	
Patient:	Patient ID:	DOB:	
Facility: Florence	Facility ID: South	Phone:	
Practitioner: Dr. Olafsson <del>Dr. Kinade Banner</del>	Practitioner Type: General Surgery	Location: STV	
<p>***See Attached Consultation Request for Health Services Authorized***</p> <p>For security reasons, inmates must NOT be informed of recommended treatment or possible hospitalization. Due to security considerations, all recommended tests and treatments are to be scheduled by Centurion.</p>			
<p>Review of Case (Chief complaint, exam finding, etc.):</p> <p>H/o right inguinal hernia since 2013</p>			
<p>Diagnosis and Prescription Suggestions (To be reviewed by Centurion Medical Director):</p> <p>Right inguinal hernia, Surgery recommended</p>			
Can equivalent medication substitution be used? No	Yes	No	Follow Up Needed? Yes No
If follow up needed, explain:			
A. OLAFSSON		4/15/2020	
Practitioner Name (Print)		Practitioner Signature	
		Date	

## To Be Completed by Centurion Practitioner

Recommendation after review of consultants' report:	No Further Action	Implement the following
Implement:		
Centurion Practitioner Name (Print)	Centurion Practitioner Signature	Date

WILCOX001081



## INSTRUCTIONS TO PRACTITIONER

\*\*\*\*\*  
THIS PATIENT IS AN INMATE WITH THE  
ARIZONA DEPARTMENT OF CORRECTIONS  
FOR SECURITY REASONS:

DO NOT allow the inmate to overhear any discussion about  
Recommended treatments, medications or follow-up appointments

DO NOT give the inmate medication samples!

\*Notate recommended medications on the attached Consultation Report Form\*

The Centurion provider will review the recommendation and obtain a patient specific  
prescription from our pharmacy.

---

Upon completion of today's appointment, please seal the complete Consultation  
Report and all associated paperwork in the manila envelope.

---

Give the envelope directly to the Corrections Officer.

---

Within 5 business days, please fax the dictated notes to the Clinical Coordinator's office:

FAX: 520-868-8530

Andrew Snyder, Clinical Coordinator  
Phone: 520-868-0201 ext. 83737  
Email: [asnyder1@TeamCenturion.com](mailto:asnyder1@TeamCenturion.com)

Terri Espinoza, Clinical Scheduler  
Phone: 520-868-0201 ext. 86819  
Email: [tespinoza1@TeamCenturion.com](mailto:tespinoza1@TeamCenturion.com)

Robin Hernandez, Administrative Assistant  
Phone: 520-868-0201 ext. 83740  
Email: [rhernandez1@TeamCenturion.com](mailto:rhernandez1@TeamCenturion.com)

WILCOX001082

# APPENDIX F

Redacted and Filed Under Seal



Hgt: 5' 2"  
Wgt: 175 lbs  
Rce: Caucasian  
Gen: Female  
DOB:  
Age: 53

Name: REDMOND, LAURA J.

Facility: ASPC-PV SAN CARLOS

Admission: 04/13/2020

Discharge: None

Area: Bed: \*C11 \*67L

SMI: Yes

SMIC: Yes

Medical Grade: 2

Dental Grade: 3

MH Status: Acute Distress or Outpatient SMI

ADC #: 166546 PID #: 0128865

PPD Date | Result: 06/23/2021 | Negative

CXR Date | Result: None Found

Interpreter Needed: Yes

PATIENT

CHSS001 - Patient Record Synopsis

☐ PID ☒ ADC ☐ Name

166546

Personal Favorites

Admin

Password Change

Help Desk

Build Information

Dashboards

Inmate File Jacket

Inmate Synopsis/Chronological Record

Active Orders

Allergies

Appointments

Consults

Current Health Status

Dental

Encounters

HSR

Health Problems

Labs

Medications

Precautions

Special Needs

Transfer Holds

Vitals

X-Ray Orders

Other...

### Patient Description

ADC#: 166546

Race/Sex: Caucasian Female

Location: ASPC-PV SAN CARLOS

Medical Grade: 2

Admission Date: 04/13/2020

Inmate Name: REDMOND, LAURA J.

DOB:

Bed: \*C11 \*67L

Job Assignment: Unassigned

SSN:

Age: 53

Custody: Minimum

Earliest Release:

Status: Active

### Current Health Problem/Conditions (1 - 64 of 64)

ID#	Category	Type	National HIE Code(s)	Diagnosis Code	Reaction	Severity	Onset Date	Last Encounter Date
065	Other Diagnosis	Other Diagnosis	SNOMED: 16386004 - Dry skin (finding)	Xerosis cutis [L85.3]			09/30/2021	09/30/2021
064	Mental Health	Mental Health	SNOMED: 46206005 - Mood disorder (disorder)	Unspecified mood [affective] disorder [F39]			09/22/2021	09/22/2021

WILCOX001062



Hgt: 5' 2"  
Wgt: 175 lbs  
Rce: Caucasian  
Gen: Female  
DOB:   
Age: 53

**Name: REDMOND, LAURA J.**

Facility: ASPC-PV SAN CARLOS  
Admission: 04/13/2020  
Discharge: None

Area | Bed: \*C11 | \*67L  
SMI: Yes  
SMIC: Yes

Medical Grade: 2  
Dental Grade: 3  
MH Status: Acute Distress or Outpatient SMI

**ADC #: 166546 PID #: 0128865**

PPD Date | Result: 06/23/2021 | Negative  
CXR Date | Result: None Found  
Interpreter Needed: No

**PATIENT**



CHSS001 - Patient Record Synopsis

☐ PID ☒ ADC ☐ Name

166546

- Active Orders
- Allergies
- Appointments
- Consults
- Current Health Status
- Dental
- Encounters
- HSR
- Health Problems
- Labs
- Medications
- Precautions
- Special Needs
- Transfer Holds
- Vitals
- X-Ray Orders
- Other...

**Patient Description**

ADC#:	166546	Inmate Name:	REDMOND, LAURA J.	SSN:		Status:	Active
Race/Sex:	Caucasian Female	DOB:		Age:	53	Custody:	Minimum
Location:	ASPC-PV SAN CARLOS	Bed:	*C11 *67L	Earliest Release:			
Medical Grade:	2	Job Assignment:	Unassigned				
Admission Date:	04/13/2020						

**Current Health Problem/Conditions (1 - 64 of 64)**

ID#	Category	Type	National HIE Code(s)	Diagnosis Code	Reaction	Severity	Onset Date	Last Encounter Date
065	Other Diagnosis	Other Diagnosis	SNOMED: 16386004 - Dry skin (finding)	Xerosis cutis [L85.3]			09/30/2021	09/30/2021
064	Mental Health	Mental Health	SNOMED: 46206005 - Mood disorder (disorder)	Unspecified mood [affective] disorder [F39]			09/22/2021	09/22/2021
063	Other Diagnosis	Other Diagnosis	SNOMED: 249932008 - Lower facial weakness (finding)	Facial weakness [R29.810]			08/19/2021	08/19/2021
062	Other Diagnosis	Other Diagnosis	SNOMED: 279039007 - Low back pain (finding)	Low back pain [M54.5]			06/08/2021	06/08/2021
061	Mental Health	Mental Health	SNOMED: 698693004 - Adjustment disorder with anxious mood in remission (disorder)	Adjustment disorder with mixed anxiety and depressed mood [F43.23]			04/26/2021	04/26/2021
060	Other Diagnosis	Other Diagnosis	SNOMED: 22253000 - Pain (finding)	Pain, unspecified [R52]			09/02/2020	09/02/2020
059	Other Diagnosis	Other Diagnosis	SNOMED: 54586004 - Lower abdominal pain (finding)	Lower abdominal pain, unspecified [R10.30]			06/16/2020	06/16/2020
058	Other Diagnosis	Other Diagnosis	SNOMED: 21543000 - Acute actinic otitis externa (disorder)	Acute actinic otitis externa, unspecified ear [H60.519]			05/26/2020	05/26/2020
			SNOMED: 47505003 - Posttraumatic stress	Post-traumatic stress disorder, unspecified				

**WILCOX001061**