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November 24, 2025

Director, FTCA Section Torts Branch, Civil Division U.S. Department of Justice
P.O. Box 888 Benjamin Franklin Station, NW, Washington, DC 20044

Re: Administrative Tort Claim of Ryan Samsel – Claim for Damages Under the
Federal Tort Claims Act (28 U.S.C. §§ 1346(b), 2671–2680)

Dear Director of the Federal Tort Claims Act Section:

Please find attached a completed Standard Form 95 submitted on behalf of claimant Ryan Samsel. The claim is submitted in accordance with the requirements of the Federal Tort Claims Act and details sixty-two (62) separate assaults and other torts committed against Mr. Samsel while in the custody of the United States, as well as cruel and unusual punishment.

The incidents occurred in federal facilities under the control of the U.S. DOJ and Bureau of Prisons in the District of Columbia, New York, and Virginia.

Given the severity, duration, and documented multiplicity of the abuses suffered by Mr. Samsel, he is likely to be recognized as the most tortured individual by the Federal Government in recent American history.

This letter and the attached Standard Form 95 constitute formal presentment of Mr. Samsel's administrative claim pursuant to 28 U.S.C. § 2675(a). Please assign a claim number and written receipt at your earliest convenience.

Thank you for your prompt attention to this matter.

Respectfully submitted,


Peter Haller

Encl.

**CLAIM FOR DAMAGE,
INJURY, OR DEATH****INSTRUCTIONS:** Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions.FORM APPROVED
OMB NO. 1105-0008

1. Submit to Appropriate Federal Agency:

Federal Tort Claims Act Section, Torts Branch, Civil Division U.S.
Department of Justice, P.O. Box 888 Benjamin Franklin Station
Washington, DC 200442. Name, address of claimant, and claimant's personal representative if any.
(See instructions on reverse). Number, Street, City, State and Zip code.Ryan Samsel, 743 Corson St. Bristol, PA 19007 2nd Fl,
represented by Peter G Haller, Esq., 312 Idleman Run Rd,
Davis WV 26260, peterhaller@hillstrat.com, 551-358-2943

3. TYPE OF EMPLOYMENT

☐ MILITARY ☒ CIVILIAN

4. DATE OF BIRTH

09/03/1983

5. MARITAL STATUS

Single

6. DATE AND DAY OF ACCIDENT

Exhibit A, B

7. TIME (A.M. OR P.M.)

8. BASIS OF CLAIM (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof. Use additional pages if necessary).

See Exhibits A & B. The date of the continuous scheme is from January 29, 2021 through January 21, 2025. Exhibit A provides the Statement of Facts and Legal Standard. Exhibit B provides the Tort Valuation List.

9. **PROPERTY DAMAGE**

NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, Street, City, State, and Zip Code).

N/A

BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF THE DAMAGE AND THE LOCATION OF WHERE THE PROPERTY MAY BE INSPECTED.
(See instructions on reverse side).

N/A

10. **PERSONAL INJURY/WRONGFUL DEATH**

STATE THE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE THE NAME OF THE INJURED PERSON OR DECEDENT.

See Exhibit A & B

11. **WITNESSES**

NAME

ADDRESS (Number, Street, City, State, and Zip Code)

See Exhibit C

See Exhibit C

12. (See instructions on reverse).

AMOUNT OF CLAIM (in dollars)

12a. PROPERTY DAMAGE

0.00

12b. PERSONAL INJURY

17,980,000

12c. WRONGFUL DEATH

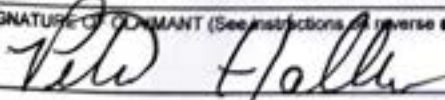
0.00

12d. TOTAL (Failure to specify may cause
forfeiture of your rights).

17,980,000

I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE INCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM.

13a. SIGNATURE OF CLAIMANT (See instructions on reverse side).



13b. PHONE NUMBER OF PERSON SIGNING FORM

551-358-2943 (Peter Haller - Exh. D)

14. DATE OF SIGNATURE

11/14/2025

**CIVIL PENALTY FOR PRESENTING
FRAUDULENT CLAIM**

The claimant is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages sustained by the Government. (See 31 U.S.C. 3729).

**CRIMINAL PENALTY FOR PRESENTING FRAUDULENT
CLAIM OR MAKING FALSE STATEMENTS**

Fine, imprisonment, or both. (See 18 U.S.C. 287, 1001.)

INSURANCE COVERAGE

In order that subrogation claims may be adjudicated, it is essential that the claimant provide the following information regarding the insurance coverage of the vehicle or property.

15. Do you carry accident insurance? ☐ Yes If yes, give name and address of insurance company (Number, Street, City, State, and Zip Code) and policy number. ☒ No

16. Have you filed a claim with your insurance carrier in this instance, and if so, is it full coverage or deductible? ☐ Yes ☒ No

17. If deductible, state amount.

18. If a claim has been filed with your carrier, what action has your insurer taken or proposed to take with reference to your claim? (It is necessary that you ascertain these facts).

19. Do you carry public liability and property damage insurance? ☐ Yes If yes, give name and address of insurance carrier (Number, Street, City, State, and Zip Code). ☒ No

INSTRUCTIONS

Claims presented under the Federal Tort Claims Act should be submitted directly to the "appropriate Federal agency" whose employee(s) was involved in the incident. If the incident involves more than one claimant, each claimant should submit a separate claim form.

Complete all items - Insert the word NONE where applicable.

A CLAIM SHALL BE DEEMED TO HAVE BEEN PRESENTED WHEN A FEDERAL AGENCY RECEIVES FROM A CLAIMANT, HIS DULY AUTHORIZED AGENT, OR LEGAL REPRESENTATIVE, AN EXECUTED STANDARD FORM 95 OR OTHER WRITTEN NOTIFICATION OF AN INCIDENT, ACCOMPANIED BY A CLAIM FOR MONEY

Failure to completely execute this form or to supply the requested material within two years from the date the claim accrued may render your claim invalid. A claim is deemed presented when it is received by the appropriate agency, not when it is mailed.

If instruction is needed in completing this form, the agency listed in item #1 on the reverse side may be contacted. Complete regulations pertaining to claims asserted under the Federal Tort Claims Act can be found in Title 28, Code of Federal Regulations, Part 14. Many agencies have published supplementing regulations. If more than one agency is involved, please state each agency.

The claim may be filed by a duly authorized agent or other legal representative, provided evidence satisfactory to the Government is submitted with the claim establishing express authority to act for the claimant. A claim presented by an agent or legal representative must be presented in the name of the claimant. If the claim is signed by the agent or legal representative, it must show the title or legal capacity of the person signing and be accompanied by evidence of his/her authority to present a claim on behalf of the claimant as agent, executor, administrator, parent, guardian or other representative.

If claimant intends to file for both personal injury and property damage, the amount for each must be shown in item number 12 of this form.

DAMAGES IN A SUM CERTAIN FOR INJURY TO OR LOSS OF PROPERTY, PERSONAL INJURY, OR DEATH ALLEGED TO HAVE OCCURRED BY REASON OF THE INCIDENT. THE CLAIM MUST BE PRESENTED TO THE APPROPRIATE FEDERAL AGENCY WITHIN TWO YEARS AFTER THE CLAIM ACCRUES.

The amount claimed should be substantiated by competent evidence as follows:

- (a) In support of the claim for personal injury or death, the claimant should submit a written report by the attending physician, showing the nature and extent of the injury, the nature and extent of treatment, the degree of permanent disability, if any, the prognosis, and the period of hospitalization, or incapacitation, attaching itemized bills for medical, hospital, or burial expenses actually incurred.
- (b) In support of claims for damage to property, which has been or can be economically repaired, the claimant should submit at least two itemized signed statements or estimates by reliable, disinterested concerns, or, if payment has been made, the itemized signed receipts evidencing payment.
- (c) In support of claims for damage to property which is not economically repairable, or if the property is lost or destroyed, the claimant should submit statements as to the original cost of the property, the date of purchase, and the value of the property, both before and after the accident. Such statements should be by disinterested competent persons, preferably reputable dealers or officials familiar with the type of property damaged, or by two or more competitive bidders, and should be certified as being just and correct.
- (d) Failure to specify a sum certain will render your claim invalid and may result in forfeiture of your rights.

PRIVACY ACT NOTICE

This Notice is provided in accordance with the Privacy Act, 5 U.S.C. 552a(e)(3), and concerns the information requested in the letter to which this Notice is attached.

- A. Authority: The requested information is solicited pursuant to one or more of the following: 5 U.S.C. 301, 28 U.S.C. 501 et seq., 28 U.S.C. 2671 et seq., 28 C.F.R. Part 14.

- B. Principal Purpose: The information requested is to be used in evaluating claims.
- C. Routine Use: See the Notices of Systems of Records for the agency to whom you are submitting this form for this information.
- D. Effect of Failure to Respond: Disclosure is voluntary. However, failure to supply the requested information or to execute the form may render your claim "invalid."

PAPERWORK REDUCTION ACT NOTICE

This notice is solely for the purpose of the Paperwork Reduction Act, 44 U.S.C. 3501. Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Director, Tort Branch, Attention: Paperwork Reduction Staff, Civil Division, U.S. Department of Justice, Washington, DC 20530 or to the Office of Management and Budget. Do not mail completed form(s) to these addresses.

EXHIBIT A

STATEMENT OF FACTS

The following is a description that sets forth a clear, detailed, and truthful account of the events, injuries, and treatment experienced by Ryan Samsel during his federal detention from January 30, 2021, through January 21, 2025 where sixty-two torts against Mr. Samsel reflect a continuous scheme to physically and mentally harm him throughout his imprisonment and continuously deny him necessary medical treatment for serious vascular issues that pre-existed prison as well as for most injuries sustained from attacks by corrections officers during prison. These torts concluded with his release from prison one full day after President Trump pardoned Mr. Samsel, and prior to his sentencing.

Parties and Personal Background

Ryan Samsel is a United States citizen who, during the period relevant to this narrative, was continuously detained in federal custody from January 30, 2021, through January 21, 2025, the date of his arrest and subsequent legal proceedings. Mr. Samsel received a Presidential Pardon on January 20, 2025, as a January 6, 2021, protester.

Throughout his detention, Mr. Samsel was held at multiple correctional facilities, including but not limited to the District of Columbia Jail (DC Jail), Rappahannock Regional Jail (RRJ), Central Virginia Regional Jail (CVRJ), Northern Neck Regional Jail (NNRJ), Federal Detention Center Philadelphia, Lewisburg Penitentiary, and Metropolitan Detention Center Brooklyn.

His period of incarceration extended one day beyond the date of his pardon, because of actions taken by an Assistant United States Attorney who requested that he remain imprisoned based on alleged additional criminal conduct, for which he was never convicted. This request was later determined to be unfounded, and the Assistant United States Attorney involved was subsequently dismissed from her position following recognition of her misconduct.

Chronology of Incidents and Events

I. Arrest and Initial Detention (January 2021)

On or about January 29, 2021, the FBI issued a Complaint and Statement, Arrest Warrant¹ for Ryan Samsel in which they set forth three criminal charges at the time: 18 USC §111, Forcibly assaulted, resisted, opposed, impeded, intimidated, or interfered with a federal agent while they are engaged in their official duties; 18 USC § 231(a)(3) Committed or attempt to commit any act to obstruct, impede, or interfere with any fireman or law enforcement officer lawfully engaged in the lawful

¹ Ryan Samsel, 1:21-mj-00188-ZMF Document 1-1 Filed 01/29/21

performance of his official duties; and 18 USC §1512(c), Obstructed, influenced, or impeded any official proceeding, or attempt to do so.

While the Arrest Warrant charged that Mr. Samsel crossed into areas that were temporarily closed to the public, (and normally open to the public), as the Arrest Warrant, states “On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.”² Mr. Samsel was not, or ever alleged, to have entered the Capitol.

Further, the Complaint and statement alleged that he assaulted an Officer because he pushed a temporary bike fence, CCTV footage and even the FBI sworn statement states that, “**SAMSEL** picked 0-1 up off the ground.”³ but fails to explain that it was Mr. Samsel approached her to help her up, and instead attributes a statement by an officer, who had allegedly lost consciousness, that Samsel, “according to 0-1, said, “We don't have to hurt you, why are you standing in our way?”

Ryan Samsel was arrested by federal agents in Levittown, Pennsylvania. Following his arrest, he was transported to a local police station in Bensalem, Bucks County, Pennsylvania. While awaiting processing, one of the arresting agents or marshals questioned Mr. Samsel and advised him to provide misleading information in anticipation of a later interview at the police station. He was pressured to cooperate with law enforcement to give false statements, which caused him significant distress and anxiety regarding his liberty and personal safety.

II. Philadelphia Detention Center and Transfer to District of Columbia Jail (Late January–Early February 2021)

Upon arrival at the Philadelphia Detention Center, Mr. Samsel participated in a bond hearing via telephone due to the COVID-19 pandemic. After the hearing, he remained on the phone with the Philadelphia Public Defender’s Office. His public defender informed him that she had spoken with Washington, D.C. prosecutors, who were willing to offer leniency if he agreed to cooperate and provide false testimony against other individuals. Mr. Samsel was told that if he complied, he would not be indicted but instead face a lesser criminal complaint and likely receive probation. He, however, refused to lie. Relevant to showing that they sought untruthful information is the fact that Mr. Samsel was not alleged to have been in conspiracy with anyone, had no texts or other communications with anyone besides his girlfriend about his trip to Washington, DC, and knew no one besides his girlfriend present that day. All information he was asked to provide would be based on knowledge he did not have because while he could speak to what he witnessed that day, he lacked knowledge of

² Id. at p. 1.

³ Id. at p. 5.

who people were, or how to identify others, which was information that the government sought him to testify to, identifying others.

Following his refusal, Mr. Samsel was fast-tracked to the D.C. Jail, bypassing the standard transfer procedures, including the usual flight to Oklahoma. Federal prosecutors arranged for him to be driven directly to the D.C. Jail. Upon arrival, he was held in the quarantine section for ten days. On the eighth day, he tested positive for COVID-19 and was subsequently sent to the basement of the jail. During this transfer, correctional staff, including Officer Haze, publicly and falsely labeled Mr. Samsel as a “Proud Boy,” making comments to other inmates and clearly putting a target on him. As he walked through the jail, other inmates from the general population spat on him, threw objects, and cursed at him because of the guards’ comments. This false statement placed him at risk and caused substantial fear and humiliation.

Mr. Samsel was held in the basement for another ten days. Once his quarantine period ended, he was placed in the special housing unit designated for January 6 defendants. His lawyer explained that the FBI had little interest in him, but wanted a sit-down with him and the prosecution from Washington, D.C. He was told that he could go home if he agreed to provide the information they sought, but he refused to participate in any further interviews or meetings. **Mr. Samsel was kept in custody, from January 30, 2021, nearly seven (7) months, however, was not Indicted until August 25, 2021, in clear violation of due process.**⁴

On August 25, 2021, Mr. Samsel was charged with much more than the original arrest warrant in the First Indictment:

18 U.S.C. § 231(a)(3) (Civil Disorder); 18 U.S.C. §§ 111(a)(l) and (b), 2 (Assaulting, Resisting, or Impeding Certain Officers Using a Dangerous Weapon and Inflicting Bodily Injury); 18 U.S.C. §§ 1752(a)(4), (b)(l)(A), (b)(1)(B), 2 (Engaging in Physical Violence in a Restricted Building or Grounds with a Deadly or Dangerous Weapon and Resulting in Significant Bodily Injury); 40 U.S.C. § 5104(e)(2)(F), 2 (Act of Physical Violence in the Capitol Grounds or Buildings); 18 U.S.C. §§ 1512(c)(2), 2 (Obstruction of an Official Proceeding).⁵

III. Assaults and Retaliation at District of Columbia Jail (February–March 2021).

During his time in the D.C. Jail, which was before Mr. Samsel was indicted, Mr. Samsel was subjected to a coordinated assault led by Corporal Hayes and other correctional staff. Corporal Hayes conducted a morning raid, threatening inmates

⁴ Ryan Samsel, 1:21-cr-00537-JMC, ECF 46, Filed 08/25/21.

⁵⁵ *Id.*

and stating that they were going to “learn to cooperate” and that he had orders to “raise the bar.” He then walked directly to Jake Lang’s cell, handcuffed him, and moved him to another cell. Immediately after, Corporal Hayes came to Mr. Samsel’s cell, opened the door, and ordered him to sit down, pointing a large can of mace at him. When Mr. Samsel asked for an explanation, Corporal Hayes refused and directed him to put his hands behind his back. Mr. Samsel informed him that he had a doctor’s note requiring front cuffing due to blood clots and thoracic outlet syndrome. Corporal Hayes allowed him to be cuffed in front, then told him he was being moved to a cell off camera.

After arriving at the new cell, Mr. Samsel was uncuffed from the front. Shortly thereafter, he was directed to back up to the door, where he was zip-tied from behind. When he attempted to turn around, he experienced white flashes and lost consciousness. Upon regaining awareness, he was still zip-tied and his head hurt severely. He managed to shift his hands to the front of his body and used the bottom of a stool to break the zip tie, which was digging into his wrist. After freeing himself, he threw the zip tie into the back corner of the cell.

Later, a guard allowed Mr. Samsel out to use the phone, and he informed his family about what had happened. His face was swollen, and he tried to hide it from the guard. The next morning, his friends noticed his injuries, having witnessed the assault. Another day passed, and he continued to hide his face, but a sergeant and lieutenant entered his cell and asked what had happened. Not wanting to disclose the assault, Mr. Samsel told them he had fallen. He was immediately rushed to Howard University Hospital in an ambulance and placed in the ICU.

Medical records show that Mr. Samsel was assaulted in the late hours on March 21, 2022. This occurred while in the custody of the District of Columbia Department of Corrections, and while detained in administrative segregation. When Mr. Samsel was taken to Howard University Hospital on March 22, 2021, he was admitted for injuries including, but not limited to *head strike and loss of consciousness*, bilateral eye ecchymosis, *acute kidney injury*, *injury of the wrists* (evidence of being held down), *fracture of the orbital floor* (right side / closed fracture), *bilateral facial bilateral nasal bone fracture* and *thoracic outlet syndrome*.

A Tucker Carlson mini-series provides a re-enactment of the assault:

<https://x.com/TuckerCarlson/status/1456341992640860161?t=hWIwKNKRqVpD1EFN34JVbw&s=09>

According to Ryan, when the doctor came to his room, the guards told the doctor that Mr. Samsel was an insurrectionist from the Capitol on January 6. Mr. Samsel sensed that the doctor wanted him out of the hospital as quickly as possible. He was returned to DC jail and stayed in the medical unit for two or three days.

During this time, he suffered a seizure and was rushed back to the hospital, where an eye doctor believed he had brain damage and recommended an MRI and other

tests. However, the guards removed him from the hospital before he was fully medically discharged.

Follow up medical records from Howard document that, “04.01.21 document right orbital floor fracture.” The orbital fracture is the bony outer edges of the eye socket. The eye rim is made up very thick bone, a lot of force needed to fracture – typically seen in car accidents... and the risk of other injuries to the face and possibly the Optic Nerve. The Optic nerve connects to the brain, transmits what the eye sees to the brain. Damage to that nerve could indicate brain damage..., but Mr. Samsel received no MRI of the Brain, or Neurological examination or subsequent follow up.

Medical records from Howard University show that ultimately, because of the assault, Mr. Samsel reduced vision in his right eye, suffered seizures, and continuing pain and suffering in relation to the aggravation of the thoracic outlet syndrome as well as a cystic condition and a general lack of follow up care.

A court hearing was held before Magistrate Judge Faruqui, and the Magistrate Judge determined that Mr. Samsel should be transferred to an undisclosed jail for his protection and to receive the medical care he was entitled to. He was transferred to Rappahannock Regional Jail in Virginia, which occurred sometime in late March or early April 2021.

IV. Rappahannock Regional Jail, Virginia (April 2021)

Upon transfer to Rappahannock Regional Jail, still unindicted, Mr. Samsel was immediately placed on a fourteen-day quarantine unit due to COVID-19 protocols. After quarantine, he was assigned to general population, but contrary to what he was told, he was housed with Virginia county inmates rather than other federal detainees. There was no available bed space, so he was given a mattress and slept on the floor.

During this period, Mr. Samsel learned that his father had passed away. He had previously known his father was sick and had repeatedly requested phone calls, but because he was not vaccinated, he could only be let out when other inmates were not present. Many times, this did not occur, and he was denied his phone calls. He also consistently requested access to the law library, as he was uncertain about the status of his case, but the jail did not have a law library.

When seen by medical staff, Mr. Samsel explained his longstanding blood clots and the new injuries he had sustained from the assault at the D.C. Jail. The doctor at Rappahannock examined the large, swollen glands in his chest and recommended that he see a reconstructive plastic surgeon, as well as a vascular surgeon. He was referred to Rappahannock Vascular Surgery, where the vascular surgeon determined that his first two ribs would need to be removed bilaterally. After the ribs were removed, they planned to bypass his subclavian veins using veins from another part of his body, most likely his legs.

Once Rappahannock Regional Jail realized the seriousness of Mr. Samsel's blood clot case, a hearing was held before Judge Faruqui, a D.C. Magistrate Judge. The jail stated on the record that they did not have the medical resources for aftercare, nor the manpower to transport him to the many hospital appointments required.

One day, while watching the news, a cellmate recognized Mr. Samsel from television and attacked him, calling him a terrorist. Both were sent to solitary confinement ("the SHU"), but after a sergeant reviewed CCTV footage, Mr. Samsel was found not guilty.

Three days later, another hearing was held before Magistrate Judge Faruqui, this time with the head of the D.C. Marshals, Marshal Derek Haywood, present. On the court record, the U.S. Marshal stated that Mr. Samsel would be transferred to a jail equipped for medical care and that all recommended procedures would be approved. He was to be transferred to Central Virginia Regional Jail (CVRJ).

V. Central Virginia Regional Jail (CVRJ) (July–August 2021)

Upon transfer to CVRJ, Mr. Samsel underwent initial intake with medical staff, who were unaware of his medical history because none of his records had followed him. The nurse, Diedra Lewis, told him she would contact the U.S. Marshals to obtain his medical records, but this became a routine issue throughout his four years of incarceration.

For approximately seventy to ninety days, Mr. Samsel was housed in reception in a cell that was three feet wide and six feet long. The cell was so small that he had to stand his mattress up to walk. When he asked the deputy warden why he was being kept in such confinement, he was told there was nowhere else to put him and that he was classified as a sex offender. Mr. Samsel explained that he was not a sex offender, but the deputy warden insisted that, for his safety, he had to remain in those conditions. A black magnet was placed over his window so he could not see out, and the lights were left on at all times. He was never allowed out for exercise, had no access to the law library, barber shop, or hygiene materials. Occasionally, if the right guard was on duty, he was allowed a shower.

After his attorneys contacted the DOJ attorneys, including April Russo, about the false labelling of Mr. Samsel as a "sex offender," the DOJ attorney emailed the deputy warden to clarify that Mr. Samsel was never charged or convicted of any sex crimes, he was moved to the medical unit. He was then sent to UVA vascular surgery, where imaging confirmed the need for a compression sleeve and physical therapy to relieve pain, as well as blood thinners. None of these treatments were provided.

On September 15, 2021, the day after the Court's last status conference, Mr. Samsel was involved in an incident with the correctional officers at CVRJ. Late that evening, officers came to Mr. Samsel's cell to move him back to solitary confinement. According to records provided by the U.S. Marshals Service ("USMS"), it was reported that Mr. Samsel was "*dropped while being removed*" from his cell.

The CVRJ records further provide that after receiving medical attention in solitary confinement, Mr. Samsel had “mild redness on the left side of his face at the cheek bone area.”

An email showed that a USMS nurse visited Mr. Samsel the next day, and that she gave him an ice pack and they discussed his vomiting a few times in the middle of the night, which is consistent with head trauma, not otherwise documented by the jail. There was no use of force documentation provided.

What Mr. Samsel explains occurred is that t, an argument broke out between a guard and an inmate on the medical unit. When a SWAT team of about twelve officers entered the block, they directed Mr. Samsel to get down on the ground. An extremely heavy-set guard sat on his back, using a shield, and shackled his feet and hands behind his back, contrary to doctor’s orders. His head slammed into the ground, and he was carried off the block. At the steps, he was dropped. Within twenty-four to forty-eight hours, Mr. Samsel woke up in a wheelchair being transported to UVA Culpepper Hospital. The doctor diagnosed him with contusions to the side of his head, bruising his back, and a concussion.

Upon returning to the jail, Mr. Samsel was forced to stay in the small cell at the front of the jail and alternated between there and the SHU (“the hole”), with the lights always left on and a camera on him. This continued for about four months. This is a known form of torture, to leave a person in confinement with the lights on at all times. At some point, after his counsels’ efforts and Mr. Samsel’s contacting the Virginia State Police, the police came to CVRJ. This was also raised by his counsel, and a hearing was held, where his attorneys put on the record these facts, and he was transferred again. They argued that he was left in solitary with the lights on for over 40 days. When this was raised in a hearing, the jail claimed he being held under “administrative segregation” standards with one hour outside a day, but CVRJ had no video or other evidence that he had ever been allowed outside.

His counsel confirmed that ‘There is a log noted dated 09/22/2021 by Bell, Lynsey noting,

“Inmate returned from the hospital after being sent for a synocopal episode. Discharge notes a likely concussion from a previous injury. EKG and Glucose are normal. CT Head shows no [fracture] or bleeding in the brain. Copy of CT scan attached...’

His counsel were unable to get a copy of the CT. They also confirmed that State Police Sgt. Whetzler saw inmate in Segregation...and documented in relevant part that, **“Mr. Samsel’s face hit an officer’s knee...during a cell extraction.”**

While at CVRJ, he had multiple hearings with Judge Kelly, who ordered the jail to provide all his medical records. The jail refused to comply, even after being given twenty-four hours to do so. Some records were produced, but Mr. Samsel never received complete records or medical follow up, or prescriptions.

VI. Northern Neck Regional Jail (NNRJ) (Approx. April 2021 Onward)

Upon transfer to NNRJ, Mr. Samsel was housed on unit J, which was set up like a warehouse with numerous bunk beds. Federal inmates were not supposed to be housed with county inmates, but this rule was not followed. After media coverage, including misleading articles, he was placed in solitary confinement for “protection.” Again, without time outside.

During legal visits, Mr. Samsel was restrained with his hands cuffed to the front and a belt, and his hands tied to the belt. After a legal visit via Zoom, he tried to show the guard his doctor’s note requiring front cuffing, but the guard yelled at him to get down and slammed him to the ground. Mr. Samsel did not resist. The guard forced his hands behind his back, and when he was lifted up, medical staff were already in the hallway. Captain English and four other guards slammed him into the wall, told medical to look at him, and noted a lump above his eye. When Mr. Samsel asked what was happening, Captain English told him he was “about to find out.” **He was dragged down the hall, away from cameras, and Captain English radioed for the slider doors to be closed. Once closed, the guards stabbed his legs and ankles with keys, then rushed him toward the door and slammed his face and head into it. After the doors opened, he was punched repeatedly in the corridor in view of sixty to ninety inmates. After another set of doors opened, his head was slammed again, and he was thrown onto a table in the day room. His cell was searched for contraband, and when none was found, he was beaten further in his cell.**

Mr. Samsel was pulled out by medical staff, who gave him CPR and administered Narcan. He was taken to Tappahannock Hospital, where his injuries were documented, including a broken orbital and stab marks on his legs. Dr. Dudley, who worked at both the jail and the hospital, questioned Mr. Samsel about the assault and recorded him with his phone. Later investigations showed that when 911 called the jail, Captain English acted as if he did not know who Mr. Samsel was and assured them, he was fine.

After the assault, Mr. Samsel was able to make a phone call to his family and lawyer, Julia Haller, and asked her to call 911. She contacted the DOJ and the U.S. Marshall who was responsible for Mr. Samsel’s placement, Derek Haywood. Ms. Haller drove to NNRJ and demanded a legal visit. She met with Mr. Samsel and witnessed the bruising, hematomas, bumps on the top of his head, and wounds to his entire head, she also saw his wrists were wide and flat, evidencing that he was held down. She could not take a picture because NNRJ did not allow her to bring her computer or phone into the legal meeting. However, the next day on a legal zoom call, his attorneys took a photo through the camera.



Counsel also confirmed that

The NNRJ “Synopsis of Care” medical report provided by the U.S. Marshal’s Service provides:

1033 called in E-Pod around 1835. When going into the pod, **Inmate Samsel was lying face down in the cell.** I, Nurse A. ran to get the emergency bag. When coming back to the pod, Inmate Samsel was being rolled over by EMT F. . . . Inmate Samsel had a **quarter size goose egg to the L eyebrow, some redness on his chest, and bruises on his hands from previous altercation.** Inmate Samsel given icepack during this time. Dr. D. called and advised do not send to EMS . . . (Id., emphasis added)

Nine (9) hours later, the NNRJ “Synopsis of Care” medical report provided by the U.S. Marshal’s Service provides:

On [the morning of **October 13, 2021, at approximately 3:35 AM**], **I EMT F. was called in for inmate Samsel who had fallen . . . over the night . . .** Upon a hands-on assessment, there was no deformity to the jaw but complained of pain when palpating across the lower right body region of the mandible. Dried blood was found on the right side of the Inmate’s face from the right ear down the jawline, cleaned up with gauze and water. There was a noticeable knot on his lip from where he had bit it during the fall, no bleeding at this time. Two hematomas on the left side of the inmate’s face around the eye are visible, the one above the eyebrow was from a prior incident but the one on the cheek-bone is from this current incident. **Inmate was also complaining of pains in the right wrist mainly, minor injury to the left wrist but inmate is mainly concerned of the right wrist. Heavy swelling with bruising across the back of hand and wrist. There are now noticeable bumps appearing on the back of the right hand, white**

in color compared to the discoloration of the bruising I called Dr. D. on the incident, [who advised] Transportation can take him, EMS is not needed for this incident.”

Id. (emphasis added).

In both reports, Dr. D. insists that EMS is not needed.

Log Note, October 13, 2021, documents “**dried blood on face, “from the right ear down the jawline,”... “two hematomas on the left side of the inmate’s face around the eye are visible”... “heavy swelling with bruising across the back of hand and wrist,...” “I called Dr. Dudley on the incident, giving him all the information stated above. He stated, “Transportation can take him, EMS is not needed for this incident. ... “to take him to VCU Tappahannock Emergency Department.”**⁶

Discharge Records from VCU Tappahannock, at the time, only provided in part, reflected: “**Concussion/ head injury**” and “**nondisplaced fracture through the posterior aspect of the superior left orbital wall and a right inferior orbital blowout fracture appears chronic**” and “clinical indication: injury or trauma; sprain or strain and swelling (edema); wrist; Right; Injury details; Assaulted. Dated 10/13/2021.

Upon returning to NNRJ, Mr. Samsel was placed in the medical unit, given a large screen TV, a double mattress, and commissary food.

Two days later, Captain English came to his door, shook his hand, and apologized, but Mr. Samsel told him his conduct was unprofessional and that his attorney would be notified. Despite having a letter from Dr. Dudley requiring front cuffing, Captain English made dismissive remarks but left Mr. Samsel in the cell as ordered by the warden.

In that cell, Mr. Samsel was denied phone access, pen and paper, and showers for nearly thirty days.

During a court hearing thirty-eight days later before Judge Kelly, Captain English managed to attend the Zoom session. Mr. Samsel had outbursts in court, explaining that he was denied phone calls, mail privileges, pen and paper, and showers for at least thirty days, naming Captain English directly.

On November 17, 2021, the DOJ issued the First Superseding Indictment against Mr. Samsel, adding a second victim to one of the 18 U.S.C. § 231 counts and adding a count of 18 U.S.C. § 111 for assaulting that same victim.

⁶ Record of Prisoner Medical Request dated 10/13/2021 from DOJ, USMS, VCU Emergency Department, with POC listed as Mary Barenette, which includes One NNRJ Nursing Progress

On November 29, 2021, Judge Kelly granted him a temporary bond to be released to a Pennsylvania facility, and the prosecution did not object.⁷ Mr. Samsel waited nearly two months for Pennsylvania to pick him up, related to a detainer was lodged against him for a previous case.

After the court outburst, Captain English told Mr. Samsel to pack his belongings and moved him from a cell with a TV to another lockdown cell. **He was placed in a restraint chair for approximately seventeen hours, on display for local school children to see through a window. He was left in the chair until he was unable to stand due to numbness, then dragged out by officers. He had to sit in his own waste, and it appears that subsequently he developed a blood clot.**

When it was time for Mr. Samsel to be transferred, his paperwork was delayed, and he had to appear before a local Virginia judge, who ordered Pennsylvania to pick him up. Ms. Haller appeared for that hearing. However, later in the night, when he was picked up, Captain English appeared at three in the morning in his pajamas, asking questions and seemingly trying to block his transfer.

Mr. Samsel spent about two weeks in the state of Pennsylvania's custody before being returned to FDC Philadelphia under the BOP.

On December 15, 2021, the DOJ issued a Second Superseding Indictment against Mr. Samsel adding another defendant, Mr. James Tate, who was not kept in detention, and although they did not know each other.

On January 13, 2022, the DOJ issued yet a Third Superseding Indictment, with no new facts against Mr. Samsel, but now adding three more additional defendants, and requiring, a change in the court, no longer would Judge Kelly oversee this case, who was familiar with the case, but now Mr. Samsel was transferred to yet another Judge, Judge Cobb.

All these events at Rappahannock Regional Jail, CVRJ, and NNRJ involved the same US Marshalls, the same Assistant US Attorneys, who had admittedly had to correct a false "sex offender" status at CVRJ, before he was even indicted. The repeated assaults, denial of medical care, deprivation of necessities, and systematic retaliation, resulting in lasting physical and psychological harm.

VII. Federal Detention Center Philadelphia, Lewisburg Penitentiary.

Accordingly, Mr. Samsel was transferred to the custody Pennsylvania Department of Corrections on December 20, 2021. After undergoing multiple transfers, Mr. Samsel

⁷ ECF 65, Judge Kelly's Order ("It is further ORDERED, pursuant to 18 U.S.C. § 3142(i), that Defendant shall be released temporarily from the custody of the Attorney General to the custody of the Commonwealth of Pennsylvania for the limited purpose of being incarcerated on the detainer warrant lodged against him in that jurisdiction.")

arrived at the Federal Detention Center (FDC) Philadelphia. There, he was placed in solitary confinement following a telephone call in which he expressed concerns regarding FBI corruption. Shortly thereafter, his prosecutor escalated the incident to a criminal referral, which resulted in months of isolation and a systematic denial of access to legal counsel and court hearings. During this period, Mr. Samsel was permitted only one telephone call per month and was routinely denied the opportunity to attend his court hearings or participate in legal calls. The conditions in solitary confinement were severe; he was provided with a mattress without protective covering, which was sprayed with mace, forcing him to sleep on the floor. His requests for basic necessities, including phone calls and hygiene items, were repeatedly denied.

Medical care was consistently withheld. Scheduled surgeries and specialist appointments were either canceled or obstructed, and Mr. Samsel was denied presurgical blood tests and other necessary procedures.

His counsel appealed to Judge Cobb, who issued an Order on March 4, 2022, “it is hereby **ORDERED** that the United States Marshals Service shall forthwith transfer Defendant Ryan Samsel from the Philadelphia FDC facility to the USP Lewisburg facility.”

His attorneys then argued to the court,

Subsequently, Mr. Samsel was arrested on the outstanding detainer issued by the Court following his temporary release, and detained, again in solitary confinement under constant surveillance with the lights in his cell remaining on at all times, at the Federal Detention Center in Philadelphia, Pennsylvania, for twenty (20) days until he was ultimately transferred, on or about March 15, 2022, to USP Lewisburg, where he remains now.

There, Mr. Samsel again, was held in solitary confinement for approximately seventeen (17) more days until his transfer, on March 29, 2021, to general population.⁸

His attorneys then argued a Motion for the Revocation of Detention, which the government vehemently opposed. Samsel’s attorneys’ arguments included a history of the wrongful targeting and violence against Mr. Samsel and that, “Most recently, the Court ordered Mr. Samsel’s temporary release from the custody of the U.S. Marshal’s Service because, “on the entire record here, there is reason to believe that Defendant requires medical treatment that may be more readily available at the Pennsylvania facility.” Order (Nov. 29, 2021) (ECF No. 65). Unfortunately, Mr. Samsel’s temporary release did not fully restore his access to proper medical care.”

⁸ ECF 142 at p. 11.

His attorneys also argued,

“Ultimately the Pennsylvania Department of Corrections and Parole Board concluded they had no basis upon which to further detain Mr. Samsel. He has now been detained at SCI Lewisburg for nearly three (3) weeks – again in the custody of the U.S. Marshal’s Service – where he has yet to receive the medical treatment necessitated by the injuries he has sustained during his pre-trial detention. Unfortunately, Mr. Samsel is once again without access to his medical records or the treatment they prescribe.”

At Lewisburg Penitentiary, a physician initially recommended that Mr. Samsel be placed on house arrest due to the severity of his medical condition but later reversed his opinion after receiving pressure from government officials. During his time at Lewisburg, Mr. Samsel suffered from untreated shingles, which resulted in permanent numbness in his upper right back, and he continued to experience complications from blood clots and other chronic conditions. Despite multiple medical recommendations for surgery, physical therapy, and anticoagulant therapy, these treatments were never provided.

At Lewisburg, pre-trial, the day before Mr. Samsel was scheduled for surgery at a hospital for which he did not have any details, guards came into his cell and said he had to go to the “hole” or solitary housing unit (“SHU”). The guards shook his cell down and asked where his phone was. He did not have a phone nor was it possible to have one. The guards confirmed this and then he went to the hole. While in the SHU, somebody anonymously called the surgeon assigned to his case and cancelled all his medical appointments. **As Mr. Samsel sat in the SHU, he had to rotate rooms every ten days. He was behind a man who would defecate all over his cell and smear it everywhere – an MS-13 member. Lieutenant Ordonez arranged this assignment; every ten days Mr. Samsel would have to clean up human waste, without cleaning supplies, and would end up getting it all over himself. He used to run to the shower in the cell and breathe down the hole, where he passed out a few times. This episode lasted for over three months before he was transferred to Brooklyn.**

VIII. Metropolitan Detention Center Brooklyn (2022–2025)

At Metropolitan Detention Center (MDC) Brooklyn, Mr. Samsel was housed on a violent gang unit, specifically the Mac Baller gang unit (5.3), which was known to be the most dangerous unit in the facility. Due to the lack of available cells and the refusal of other inmates to allow him to cell with them, he was forced to live in a mop closet for extended periods. The correctional officers rarely walked to the unit due to understaffing, and the inmates effectively controlled the housing arrangements. On several occasions, Mr. Samsel was permitted to live in a cell only after paying other inmates, a practice referred to as “real estate.” When the officers left the unit, he would have to return to the mop closet. **During his time at MDC Brooklyn,**

Mr. Samsel was repeatedly assaulted and robbed by other inmates. He was stabbed in the arm and, to avoid being labeled a “rat,” he used dental floss to suture the wound himself. He was also attacked and suffered injuries to his eye.

Throughout his detention at MDC Brooklyn, medical records and legal mail were consistently withheld. Every scheduled medical procedure was disrupted by transfers, and Mr. Samsel was forced to throw away his mail and property each time he was moved to a new facility. The jail was on constant lockdown, and he was denied access to the law library, which severely hindered his ability to prepare for his upcoming trial. He witnessed numerous violent incidents, including at least twenty-five stabbings and several deaths, and was involved in approximately fifteen to twenty fights with gang members who attempted to rob him. The conditions were described by federal judges as “barbaric,” and the facility was named the worst prison in the United States for its conditions.

Mr. Samsel was also subjected to repeated solitary confinement due to articles he wrote for the Gateway Pundit to get attention on this situation, which led jail staff to suspect that he possessed contraband phones. Each time he was placed in the hole, he was housed with leaders of MS-13 and was attacked for his political beliefs.

He was denied access to religious services and was never permitted to have a Bible, despite repeated requests. The deprivation of basic necessities, including food, hygiene, and exercise, was constant. Meals often consisted of cheese sandwiches and juice boxes, and Mr. Samsel was forced to “fish” for food through the toilet system with other inmates in order to survive.

LEGAL STANDARD

I. United States Constitution, Cases and relevant statutes:

“The Eighth Amendment ban against cruel and unusual punishment obliges prison authorities to deliver medical care to those whom it punishes by incarceration.” *Gasaway v. District of Columbia*, 1996 U.S. Dist. LEXIS 23176, *3 (D.D.C. April 29, 1996) (citing *Estelle v. Gamble*, 429 U.S. 97, 104 (1976)). See also *Olaniji v. District of Columbia*, 763 F.Supp. 2d 70, 96 n.23 (D.D.C. 2011) (“The District of Columbia is constitutionally obligated to provide inmates with medical care.”).

- “Yet the blows directed at Hudson, which caused bruises, swelling, loosened teeth, and a cracked dental plate, are not de minimis for Eighth Amendment purposes. The extent of Hudson's injuries thus provides no basis for dismissal of his § 1983 claim.”

Hudson v. McMillian, 503 U.S. 1, 10, (1992).

- 42 U.S.C. § 1983 provides that “Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State . . . subjects or causes to

be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress."

- 18 U.S.C. § 241 prohibits two or more people from conspiring "to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same." *United States v. LaVallee*, 439 F.3d 670, 684-685, (10th Cir. 2006). ("...The unnecessary and wanton infliction of pain constitutes cruel and unusual punishment.").
- *Madrid v. Gomez*, 889 F. Supp. 1146, 1155, 1995 U.S. Dist. LEXIS 841, 1995 LX 20550 (found Pelican Bay's constant illumination in SHU units torturous).
- *Ashker v. Governor of Cal.*, 2015 U.S. Dist. LEXIS 201787, *16, 2015 WL 14023742 (The Court, in a previous order, found that "these allegations are plausible in light of another court's fact findings that even shorter stays in the SHU are capable of causing psychological harm." April 9, 2013, Order Denying Defs.' Mot. Dismiss, Docket No. 191 at 9. Prolonged stays in SHU -- no matter which SHU -- may violate the Eighth Amendment.').
- "Following *Wolff*, we recognize that States may under certain circumstances create liberty interests which are protected by the Due Process Clause. See also *Board of Pardons v. Allen*, 482 U.S. 369, (1987). But these interests will be generally limited to freedom from restraint which, while not exceeding the sentence in such an unexpected manner as to give rise to protection by the Due Process Clause of its own force, see, e. g., *Vitek*, 445 U.S. at 493 (transfer to mental hospital), and *Washington*, 494 U.S. at 221-222 (involuntary administration of psychotropic drugs), nonetheless imposes atypical and significant hardship on the inmate in relation to the ordinary incidents of prison life."

Sandin v. Conner, 515 U.S. 472, 483-484, (1995).

- The "prohibition [against cruel and unusual punishments] 'proscribes more than physically barbarous punishments.'" *Coleman v. N.C. Dep't of Pub. Safety*, 2025 U.S. App. LEXIS 9419, *13-14, 2025 LX 250134, 2025 WL 1156018 (4th Cir. Apr. 2025)(citing *Scinto v. Stansberry*, 841 F.3d 219, 225 (4th Cir. 2016)

(quoting *Estelle v. Gamble*, 429 U.S. 97, 102, 97 S. Ct. 285, 50 L. Ed. 2d 251 (1976)).

- The Eighth Amendment requires prison officials to "provide humane conditions of confinement and ensure that inmates receive adequate food, clothing, shelter, and medical care." *Id.* (citing *Id.* (cleaned up) (quoting *Farmer v. Brennan*, 511 U.S. 825, 832-33, 114 S. Ct. 1970, 128 L. Ed. 2d 811 (1994); *Rhodes v. Chapman*, 452 U.S. 337, 347, 101 S. Ct. 2392, 69 L. Ed. 2d 59 (1981) (prison officials may not "deprive inmates of the minimal civilized measure of life's necessities"))).
- With respect to exercise, "depriving inmates of all meaningful opportunities to exercise generally violates the Eighth Amendment[s]" proscription against cruel and unusual punishment. *N.C. Dep't of Pub. Safety*, 2025 U.S. App. LEXIS 9419, *13-14, (citing *Mitchell v. Rice*, 954 F.2d 187, 193 (4th Cir. 1992).

II. Relevant by Analogy – Do We Value a Patriotic American Citizen More than Foreign National Enemies of State?

Al Shimari v. CACI Premier Tech., Inc., No. 1:08-cv-827 (E.D. Va. 2024) (Abu Ghraib litigation) \$14 million each to of three plaintiffs, under Alien Tort Statute and Torture Victim Protection Act, where three Iraqi detainees were abused in systematic torture at Abu Ghraib, including solitary confinement, assaults, dog threats, forced nudity, electrocution, and psychological abuse (e.g., hooding, stress positions). **Two of these received \$14,000,000 each yet were only subject to two months of this abuse**, while Asa'ad Zuba'e was subject to it for one year, causing PTSD and physical injuries. Verdict emphasized the pattern of abuse across facilities. Key Evidence from Court Records and Trial Testimony (*Al Shimari v. CACI*, E.D. Va. 2024):

III. Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment

Further, the United States has obligations under the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment and in 2021 reported to the Commission in relevant part, that,

All U.S. detention facilities are operated consistent with obligations under U.S. domestic and international law and policy. Individuals are in all circumstances to be treated humanely, consistent with U.S. domestic law, international legal obligations, and U.S. policy whenever such individuals are in the custody or under the effective control of an officer, employee, or other agent of the U.S. Government or detained within a facility owned, operated, or controlled by a department or

agency of the United States; and such individuals are not to be subjected to any interrogation technique or approach, or any treatment related to interrogation, that is not authorized by and listed in the Army Field Manual, 2-22.3, without prejudice to authorized non-coercive techniques of Federal law enforcement agencies.

The Government of the United States of America, Sixth Periodic Report to the United Nations Committee against Torture (“Committee”) concerning the implementation of the United States’ obligations under the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (hereinafter referred to as “Convention” or “CAT”), in accordance with Article 19 of the Convention (Sept. 24, 2021).

IV. Substantial Evidence of Due Process Violations

When government conduct rises to a level that "shocks the conscience" or violates fundamental fairness, it can violate the Due Process Clause of the Fifth Amendment, which prohibits the federal government from depriving individuals of life, liberty, or property without due process. This clause has been interpreted to bar "outrageous government conduct" in entrapment scenarios, and in some cases, even if the defendant was predisposed to the crime.

The entrapment of January 6, 2021, protesters at the U.S. Capitol echoes the due process violations outlined in landmark Supreme Court precedents like *Sorrells v. United States*, 287 U.S. 435 (1932), where entrapment was recognized as a defense when government agents implant criminal intent in otherwise innocent individuals, and *Jacobson v. United States* (1992), which reversed a conviction due to prolonged inducement over 26 months despite the defendant's lack of predisposition.

In the January 6 cases, excessive prosecution techniques, including the misguided application of 18 U.S.C. § 1512(c)(2) —later vastly narrowed by the Supreme Court in *Fischer v. United States* 603 U.S. 480 (2024) amplified claims of outrageous government conduct that shocks the conscience under the Fifth Amendment's Due Process Clause, as articulated in *United States v. Russell* 411 U.S. 423 (1973) and *Hampton v. United States* 425 U.S. 484 (1976), where even predisposed defendants could prevail if police actions offend fundamental fairness.

Figures like Ray Epps, who urged crowds to enter the Capitol, alongside reports of up to 276 FBI agents deployed—many in plainclothes— provide clear evidence of inducement, and trigger the dual defenses of lack of predisposition and outrageous conduct permitted in *Mathews v. United States* 485 U.S. 58 (1988).

Capitol Police actions, including firing high-powered paintball guns and tear gas dividing peaceful crowds and moving part of them angrily toward the capitol, videos of agents breaking windows then encouraging protesters to escalate, and officers later opening doors to invite entry, creating hundreds of unaware and induced criminal

defendants. These all mirror the coercive tactics that could bar convictions under due process, as seen in *Russell's* emphasis on barring prosecutions from manufactured crimes.

The pipe bomb deployment near the DNC and RNC, with emerging 2025 investigations revealing potential irregularities like an agency-linked suspect adds to the narrative of a staged provocation, while weekly developments—such as House GOP probes into pipe bomb handling, suppressed footage showing peaceful conduct, and claims of withheld exculpatory evidence like Secret Service testimony contradicting violent portrayals of Trump—build a mounting case for systemic entrapment.

Anticipated Claims Include:

I. Acute Physical Injuries

Mr. Samsel suffered a broken right orbital bone, a broken nose, and a dislocated jaw as well as repeated severe batteries of the head, and severe wrist injuries, as a result of coordinated assaults by correctional staff, as all placements during pre-trial detention was managed by the U.S. Marshalls and the Assistant United States Attorneys, most notably at the District of Columbia Jail, CVRJ, and NNRJ.

The lack of continued aggravation sustained through additional abusive practices that followed notably at Pennsylvania's BOP and then the facility in Brooklyn, New York caused physical injuries, significant pain, swelling, and lasting trauma. Mr. Samsel sustained lacerations to his wrists and contusions to his back and kidney area, which were caused by excessive use of restraints, including zip-tying and physical abuse during cell extractions and transfers. Multiple concussions and repeated head trauma were documented, including episodes of loss of consciousness and subsequent neurological symptoms such as headaches and dizziness. Mr. Samsel continues to experience vision loss in his right eye, which remains unresolved and impairs his daily life and ability to function. He also suffered acute kidney damage and bruising, which were documented during hospitalization following assaults by correctional staff.

Mr. Samsel has persistent blood clots and a rare condition known as thoracic outlet syndrome, which require specialized vascular care and front cuffing during restraint. Despite medical documentation and repeated recommendations for surgery, physical therapy, and blood thinners, he was routinely denied these treatments across multiple facilities. He developed swollen glands and lumps in his chest, which were identified by medical professionals as requiring reconstructive and vascular surgery. Scheduled procedures to address these conditions were repeatedly canceled or obstructed due to frequent transfers and lack of continuity of care. Mr. Samsel also suffered from untreated shingles and chronic pain, including persistent numbness in his upper right back, which resulted from extreme stress and the lack of appropriate medical intervention. He developed high cholesterol and experienced significant

physical deterioration due to prolonged confinement, lack of exercise, and inadequate nutrition.

II. Denial and Obstruction of Medical Care

Despite multiple court orders and medical referrals, Mr. Samsel was systematically denied access to necessary medical treatment, including specialist consultations, prescribed medications, and recommended surgeries. His medical records were routinely withheld or lost during transfers, which resulted in repeated lapses in care and exacerbation of his existing conditions. Aftercare and rehabilitation for his injuries were never provided, and prescribed physical therapy and anticoagulant therapy were consistently ignored. Scheduled surgeries and specialist appointments were either canceled or obstructed, and Mr. Samsel was denied presurgical blood tests and other necessary procedures. At various facilities, including Lewisburg Penitentiary and Metropolitan Detention Center Brooklyn, medical recommendations for surgery, physical therapy, and anticoagulant therapy were never implemented, and his medical needs were consistently neglected.

III. Mental and Psychological Harm from Excessive and Barbaric Solitary Confinement

Mr. Samsel was subjected to prolonged periods of solitary confinement at several facilities, including the District of Columbia Jail, CVRJ, NNRJ, Federal Detention Center Philadelphia, Lewisburg Penitentiary, and Metropolitan Detention Center Brooklyn. Solitary confinement was often imposed as a form of retaliation, following incidents such as his refusal to cooperate with law enforcement requests for false testimony or after expressing concerns regarding FBI corruption during a telephone call. During these periods, Mr. Samsel was denied access to legal counsel, family contact, and court hearings, with restrictions always limiting him to one telephone call per month – with no time outside and with the lights permanently on. The conditions in solitary confinement were severe. At FDC Philadelphia, Mr. Samsel was provided with a mattress without protective covering, which was sprayed with mace, forcing him to sleep on the floor.

Mr. Samsel continues to suffer from post-traumatic stress, anxiety, depression, memory loss, and difficulty concentrating. These symptoms are directly attributable to the physical assaults, sensory deprivation, and psychological abuse he endured during his detention. The cumulative effect of these injuries, combined with the persistent denial of medical care, has resulted in permanent physical impairment.

Mr. Samsel continues to experience ongoing psychological trauma and requires specialized medical attention and mental health support as a direct result of the harm suffered during his federal detention. Mr. Samsel currently continues to have memory loss, inability to concentrate and suffers panic attacks due to the multiple head trauma and long-term punitive and barbaric forms of solitary confinement:

Long Term Effects of Solitary and Small Group Confinement Long-term studies of veterans of P.O.W. camps and of kidnapping and hostage situations have demonstrated that while many of the acute symptoms I outlined above tend to subside after release from confinement, there are also long-term effects which may persist for decades. These not only include persistent symptoms of post-traumatic stress (such as flashbacks, chronic hypervigilance, and a pervasive sense of hopelessness) but also lasting personality changes -- especially including a continuing pattern of intolerance of social interaction, leaving the individual socially impoverished and withdrawn, subtly angry and fearful when forced into social interaction. (This literature is reviewed in Appendix D to this declaration.) In addition, from time to time I have had the opportunity to evaluate individuals who had been incarcerated in solitary confinement several years previously; I have found the same pattern of personality change described above -- these individuals had become strikingly socially impoverished and experienced intense irritation with social interaction, patterns dramatically different from their functioning prior to solitary confinement.

Stuart Grassian, M.D., *PSYCHIATRIC EFFECTS OF SOLITARY CONFINEMENT*, (redacted, non-institution and non-inmate specific, version of a declaration submitted in September 1993 in *Madrid v. Gomez*, 889 F.Supp. 1146).

IV. Ongoing Physical Harm

Mr. Samsel suffers from permanent physical impairment stemming from multiple documented injuries sustained during his incarceration. These include a broken right orbital bone, broken nose, dislocated jaw, lacerations, contusions, and acute kidney damage, all resulting from coordinated assaults by correctional staff and other inmates. He continues to experience unresolved partial vision loss in his right eye, persistent pain, and swelling associated with these injuries.

Chronic medical conditions have also developed or worsened during his detention. Mr. Samsel has persistent blood clots and thoracic outlet syndrome, which require ongoing anticoagulant therapy and specialized vascular care. Despite repeated medical recommendations for surgery, physical therapy, and blood thinners, these treatments were systematically denied or obstructed, leading to further deterioration of his health. Swollen glands and lumps in his chest, identified as requiring reconstructive and vascular surgery, remain untreated due to repeated cancellations and lack of continuity in medical care.

Additional complications include untreated shingles resulting in permanent numbness in his upper right back, high cholesterol due to lack of exercise and inadequate nutrition, and chronic pain throughout his body. The absence of aftercare and rehabilitation for his injuries has exacerbated his physical suffering and contributed to his current state of impairment.

As of the present, Mr. Samsel's health remains compromised by the cumulative effects of his detention. He requires ongoing medical attention for blood clots, thoracic outlet syndrome, and unresolved injuries to his eye and chest. He continues to suffer panic attacks and other uncontrollable emotional consequences. The chronic pain, physical deterioration, and high cholesterol resulting from prolonged confinement and inadequate nutrition continue to affect his daily life.

Respectfully Submitted,

/s/

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Counsel for Ryan Samsel

EXHIBIT B

TORT VALUATION ANALYSIS IN THE MATTER OF RYAN SAMSEL

Table of Torts: Instances, Descriptions, Citations, and Damage Estimates

Below is a comprehensive table cataloging each event of tortious conduct described in the Statement of Facts for Ryan Samsel. Each row represents a unique, sequentially numbered event. Citations reference the specific paragraph or section in the Statement of Facts. Damage calculations are preliminary and based on typical awards for similar torts.

#	Tort	Phys/ Mental/ Both	Consp	Aggrav	Description	Citation to Stmnt of Facts	Damages
1	Physical Assault by Correctional Staff	Both	Yes	Yes	DC Jail, March 21–22, 2021: Coordinated assault by Corporal Hayes and staff; zip-tied from behind, struck, lost consciousness, severe head trauma, bilateral eye ecchymosis, acute kidney injury, wrist injury, fracture of orbital floor, bilateral facial/nasal bone fracture. Denied MRI/neurological follow-up.	DC Jail, March 21–22, 2021; Assault/ICU admission	\$1,500,000
2	Denial of Medical Care Post-Assault	Both	Yes	Yes	DC Jail, March–April 2021: After assault, denied MRI, neurological exam, and follow-up care for orbital fracture and possible brain damage. Suffered reduced vision, seizures, and pain.	DC Jail, March–April 2021	\$500,000
3	Sleep Deprivation via Solitary Confinement	Both	Yes	Yes	DC Jail, Jan–Aug 2021: Placed in special housing unit for January 6 defendants; lights on at all times, denied exercise, law library, hygiene, and showers. Sleep deprivation lasted approximately 7 months pre-indictment.	DC Jail, Jan–Aug 2021	\$1,500,000

#	Tort	Phys/ Mental/ Both	Consp	Aggrav	Description	Citation to Stmnt of Facts	Damages
4	Physical Assault by Correctional Staff	Both	Yes	Yes	CVRJ, September 15, 2021: SWAT team cell extraction; heavy-set guard sat on back, shackled hands/feet behind back (contrary to medical orders), head slammed into ground, dropped at steps, concussion, hospital admission.	CVRJ, September 15, 2021	\$1,500,000
5	Sleep Deprivation via Solitary Confinement	Both	Yes	Yes	CVRJ, July–August 2021: Confined in a cell measuring 3x6 feet for 70-90 days, with lights on 24/7 and a black magnet over the window to block outside view. Denied exercise, law library, hygiene, and sleep. Sleep deprivation lasted up to 90 days, resulting in depression, confusion, and cognitive impairment.	CVRJ, July–August 2021	\$1,500,000
6	Excessive Use of Restraints/Public Humiliation	Physical & Mental	Yes	Yes	NNRJ, November 2021: Placed in a restraint chair for approximately 17 hours, on public display for local school children to observe through a window. Left in own waste, developed blood clot, unable to stand after release. Prolonged restraint and humiliation caused physical harm and emotional distress.	NNRJ, November 2021	\$2,500,000
7	Physical Assault by Correctional Staff	Both	Yes	Yes	NNRJ, October 13, 2021: After a legal visit, slammed into wall and door, stabbed in legs and ankles with keys, punched repeatedly, dragged, CPR and Narcan administered, broken orbital, denied EMS, forced to walk inappropriately dressed in front of female inmates. Immediate and lasting physical and psychological harm.	NNRJ, October 13, 2021	\$1,500,000

#	Tort	Phys/ Mental/ Both	Consp	Aggrav	Description	Citation to Stmnt of Facts	Damages
8	Deprivation of Basic Necessities	Both	Yes	Yes	NNRJ, October–November 2021: Denied pen and paper, showers, phone access, and religious materials for nearly 30 days. Denied Bible and religious services, resulting in emotional suffering and violation of religious rights.	NNRJ, October–November 2021	\$80,000
9	Sleep Deprivation via Solitary Confinement	Both	Yes	Yes	NNRJ, October–November 2021: Solitary confinement with lights on at all times for over 40 days. Denied exercise, sleep, and outside time, resulting in persistent nightmares, anxiety, and emotional distress.	NNRJ, October–November 2021	\$500,000
10	Assault by Inmate (Deliberate Endangerment)	Both	Yes	Yes	Rappahannock, April 2021: Assaulted by cellmate after being recognized on TV, sent to solitary, denied protection by staff. Emotional distress and physical harm from deliberate endangerment.	Rappahannock , April 2021	\$100,000
11	Denial of Medical Care for Blood Clots	Both	Yes	Yes	Rappahannock, April–May 2021: Denied recommended reconstructive and vascular surgery for blood clots and thoracic outlet syndrome. No aftercare provided, resulting in worsening condition and increased risk of harm.	Rappahannock , April–May 2021	\$60,000
12	Denial of Legal Access	Mental	Yes	Yes	Rappahannock, April–May 2021: Denied access to law library, phone calls, and legal counsel during critical period after father's death. Emotional distress and legal disadvantage.	Rappahannock , April–May 2021	\$30,000

#	Tort	Phys/ Mental/ Both	Consp	Aggrav	Description	Citation to Stmnt of Facts	Damages
13	Assault by Inmate (Deliberate Endangerment) – Mop Closet	Both	Yes	Yes	MDC Brooklyn, 2022: Forced to live in a mop closet, gang violence, correctional officers rarely patrolled. Assaulted and robbed by inmates, stabbed in arm, self-sutured wound, suffered eye injury. High security section of MDC not appropriate for non-violent first time offender.	MDC Brooklyn, 2022	\$500,000
14	Assault by Inmate (Deliberate Endangerment) – Gang Unit	Both	Yes	Yes	MDC Brooklyn, 2022–2025: Placed in Mac Baller gang unit, known for violence. Repeated assaults, stabbings, and fights, deliberate indifference to safety. Ongoing physical and psychological harm.	MDC Brooklyn, 2022–2025	\$200,000
15	Sleep Deprivation via Solitary Confinement	Both	Yes	Yes	FDC Philadelphia, 2022: Solitary confinement for months, continuous lighting, sleep deprivation, denied legal and family contact, only one phone call per month. Resulted in depression, memory loss, and emotional distress.	FDC Philadelphia, 2022	\$150,000
16	Denial/Obstruction of Medical Care	Both	Yes	Yes	FDC Philadelphia, 2022: Scheduled surgery for blood clots and thoracic outlet syndrome canceled; specialist appointments obstructed; denied presurgical blood tests; medical care consistently withheld during solitary confinement. Sleep deprivation due to continuous lighting for several months.	FDC Philadelphia, 2022	\$100,000
17	Denial/Obstruction of Medical Care	Both	Yes	Yes	FDC Philadelphia, 2022: Specialist appointment for vascular surgery canceled; denied access to prescribed medications and physical therapy; repeated requests for medical care ignored.	FDC Philadelphia, 2022	\$50,000

#	Tort	Phys/ Mental/ Both	Consp	Aggrav	Description	Citation to Stmnt of Facts	Damages
18	Denial/ Obstruction of Medical Care	Both	Yes	Yes	FDC Philadelphia, 2022: Denied aftercare and rehabilitation following documented injuries; no follow-up for chronic pain and blood clots; medical records withheld during transfer.	FDC Philadelphia, 2022	\$50,000
19	Denial/ Obstruction of Medical Care	Both	Yes	Yes	Lewisburg, 2022: Surgery for blood clots and thoracic outlet syndrome canceled by anonymous call; forced to clean human waste for over three months; untreated shingles resulting in permanent numbness in upper right back; denied medical care and aftercare.	Lewisburg, 2022	\$80,000
20	Denial/ Obstruction of Medical Care	Both	Yes	Yes	Lewisburg, 2022: Denied prescribed anticoagulant therapy and physical therapy for chronic blood clots and thoracic outlet syndrome; medical records lost during transfer; no follow-up for permanent numbness and pain.	Lewisburg, 2022	\$50,000
21	Denial/ Obstruction of Medical Care	Both	Yes	Yes	Lewisburg, 2022: Denied aftercare and rehabilitation for untreated shingles and blood clots; forced to rotate rooms every ten days in solitary, exposed to unsanitary conditions, sleep deprivation for 17 days.	Lewisburg, March 2022	\$50,000
22	Sleep Deprivation via Solitary Confinement	Both	Yes	Yes	Lewisburg, March 2022: Solitary confinement for approximately 17 days; continuous lighting; forced to rotate rooms every ten days following an inmate that defecated throughout room; passed out from nausea multiple times, sleep deprivation.	Lewisburg, March 2022	\$1,500,000
23	Deprivation of Basic Necessities	Both	Yes	Yes	MDC Brooklyn, 2022: Denied food for multiple days during lockdown; forced to “fish” for food through toilet system; meals consisted of	MDC Brooklyn, 2022	\$150,000

#	Tort	Phys/ Mental/ Both	Consp	Aggrav	Description	Citation to Stmnt of Facts	Damages
					cheese sandwiches and juice boxes; denied access to hygiene items and showers for extended periods.		
24	Deprivation of Basic Necessities	Both	Yes	Yes	MDC Brooklyn, 2022–2025: Denied law library access during repeated lockdowns and solitary confinement; unable to prepare for trial; denied legal mail and counsel.	MDC Brooklyn, 2022–2025	\$20,000
25	Deprivation of Basic Necessities	Both	Yes	Yes	MDC Brooklyn, 2022–2025: Denied hygiene items and showers for weeks during lockdowns; forced to throw away mail and property during transfers; emotional distress and physical deterioration.	MDC Brooklyn, 2022–2025	\$20,000
26	Retaliation for Protected Conduct	Both	Yes	Yes	MDC Brooklyn, 2022: Retaliatory solitary confinement after writing articles for Gateway Pundit; suspected of possessing contraband phones; placed in solitary with MS-13 leaders; attacked for political beliefs.	MDC Brooklyn, 2022	\$50,000
27	Retaliation for Protected Conduct	Both	Yes	Yes	MDC Brooklyn, 2023: Retaliatory solitary confinement following publication of additional articles; denied legal and family contact; subjected to further attacks and deprivation.	MDC Brooklyn, 2023	\$50,000
28	Retaliation for Protected Conduct	Both	Yes	Yes	MDC Brooklyn, 2024: Retaliatory solitary confinement after staff suspected possession of contraband phone; placed with violent inmates; denied access to religious services and materials.	MDC Brooklyn, 2024	\$20,000
29	Public Humiliation/P	Mental	Yes	Yes	NNRJ, November 2021: Placed in restraint chair for public display for approximately 17 hours; forced inappropriate exposure; denied	NNRJ, November 2021	\$1,500,000

#	Tort	Phys/ Mental/ Both	Consp	Aggrav	Description	Citation to Stmnt of Facts	Damages
	psychological Abuse				privacy and dignity; humiliation in front of school children and other inmates.		
30	Public Humiliation/P psychological Abuse	Mental	Yes	Yes	MDC Brooklyn, 2022: Forced to walk inappropriately dressed in front of female inmates; denied privacy during searches; repeated public humiliation during lockdowns.	MDC Brooklyn, 2022	\$20,000
31	Public Humiliation/P psychological Abuse	Mental	Yes	Yes	MDC Brooklyn, 2023: Forced inappropriate exposure during transfer; denied privacy and dignity; humiliation in front of other inmates.	MDC Brooklyn, 2023	\$20,000
32	False Imprisonment (Detention Beyond Pardon)	Both	Yes	Yes	Federal custody, January 21, 2025: Detained one day beyond presidential pardon due to illegal prosecutorial request; deprivation of liberty; emotional distress – intentional act by rogue prosecutor.	Post-pardon, January 21, 2025	\$100,000
33	Denial of Religious Rights	Mental	Yes	Yes	NNRJ, October–November 2021: Denied Bible and religious services for nearly 30 days; emotional suffering from deprivation of religious rights.	NNRJ, October–November 2021	\$10,000
34	Denial of Religious Rights	Mental	Yes	Yes	MDC Brooklyn, 2022–2025: Repeated denial of Bible and religious services during solitary confinement and lockdowns; emotional suffering and spiritual deprivation.	MDC Brooklyn, 2022–2025	\$10,000
35	Lasting Physical Harm	Physical	Yes	Yes	DC Jail, March 2021: Permanent vision loss in right eye due to orbital fracture and denied follow-up care; chronic pain and unresolved injuries.	DC Jail, March 2021	\$250,000
36	Lasting Physical Harm	Physical	Yes	Yes	NNRJ, October 2021: Chronic pain and unresolved injuries (broken orbital, stab	NNRJ, October 2021	\$250,000

#	Tort	Phys/ Mental/ Both	Consp	Aggrav	Description	Citation to Stmnt of Facts	Damages
					marks, concussion) due to assault and denied aftercare.		
37	Lasting Physical Harm	Physical	Yes	Yes	Lewisburg, 2022: Permanent numbness in upper right back from untreated shingles; chronic pain and deterioration due to denied medical care and aftercare.	Lewisburg, 2022	\$150,000
38	Lasting Physical Harm	Physical	Yes	Yes	MDC Brooklyn, 2022–2025: Chronic pain, unresolved injuries (eye, jaw, blood clots, thoracic outlet syndrome), high cholesterol, physical deterioration due to repeated assaults and denied medical care.	MDC Brooklyn, 2022–2025	\$150,000
39	Lasting Mental Harm	Mental	Yes	Yes	DC Jail, March–April 2021: PTSD, anxiety, nightmares, and hypervigilance resulting from coordinated assault and subsequent denial of medical care; symptoms persisted for months following the incident. Sleep deprivation due to continuous lighting for approximately 7 months.	DC Jail, March–April 2021	\$80,000
40	Lasting Mental Harm	Mental	Yes	Yes	DC Jail, Jan–Aug 2021: Severe sleep deprivation due to continuous lighting and solitary confinement for approximately 7 months pre-indictment; resulted in memory loss, difficulty concentrating, and persistent anxiety.	DC Jail, Jan–Aug 2021	\$80,000
41	Lasting Mental Harm	Mental	Yes	Yes	CVRJ, July–August 2021: Sleep deprivation and sensory deprivation from 70–90 days in a 3x6 cell with lights on 24/7 and window blocked; led to depression, confusion, and cognitive impairment.	CVRJ, July–August 2021	\$40,000

#	Tort	Phys/ Mental/ Both	Consp	Aggrav	Description	Citation to Stmt of Facts	Damages
42	Lasting Mental Harm	Mental	Yes	Yes	NNRJ, October–November 2021: Over 40 days in solitary with lights on at all times, denied exercise and outside time; resulted in persistent nightmares, anxiety, and emotional distress.	NNRJ, October–November 2021	\$40,000
43	Lasting Mental Harm	Mental	Yes	Yes	FDC Philadelphia, 2022: Solitary confinement for months with continuous lighting, denied legal/family contact, only one phone call per month; caused depression, memory loss, and emotional distress.	FDC Philadelphia, 2022	\$30,000
44	Lasting Mental Harm	Mental	Yes	Yes	MDC Brooklyn, 2022–2025: Retaliatory solitary confinement after writing articles, housed with violent inmates, attacked for political beliefs; ongoing PTSD, depression, and hypervigilance.	MDC Brooklyn, 2022–2025	\$100,000
45	Systematic Retaliation/Wr ite-ups	Both	Yes	Yes	CVRJ, July–October 2021: Repeated write-ups for minor infractions, obstruction of legal/family contact, denial of privileges during CVRJ confinement; emotional distress and humiliation.	CVRJ, July–October 2021	\$15,000
46	Systematic Retaliation/Wr ite-ups	Both	Yes	Yes	NNRJ, October–November 2021: Repeated write-ups, denial of privileges, and obstruction of legal/family contact during NNJRJ confinement; emotional distress and humiliation.	NNRJ, October–November 2021	\$15,000
47	Systematic Retaliation/Wr ite-ups	Both	Yes	Yes	MDC Brooklyn, 2022–2025: Repeated write-ups for minor infractions, obstruction of legal/family contact, denial of privileges	MDC Brooklyn, 2022–2025	\$15,000

#	Tort	Phys/ Mental/ Both	Consp	Aggrav	Description	Citation to Stmnt of Facts	Damages
					during MDC Brooklyn confinement; emotional distress and humiliation.		
48	Exposure to Violence/Deliberate Endangerment	Both	Yes	Yes	MDC Brooklyn, 2022: Forced to live in mop closet due to lack of available cells, exposed to gang violence, correctional officers rarely patrolled, deliberate indifference to safety; repeated assaults and robberies.	MDC Brooklyn, 2022	\$100,000
49	Exposure to Violence/Deliberate Endangerment	Both	Yes	Yes	MDC Brooklyn, 2022–2025: Placed in Mac Baller gang unit, known for violence; repeated assaults, stabbings, and fights, deliberate indifference to safety.	MDC Brooklyn, 2022–2025	\$100,000
50	Deprivation of Legal Access	Mental	Yes	Yes	DC Jail, Jan–Aug 2021: Denied access to law library, legal mail, and legal counsel for nearly 7 months pre-indictment; hindered ability to prepare defense, caused emotional distress.	DC Jail, Jan–Aug 2021	\$20,000
51	Deprivation of Legal Access	Mental	Yes	Yes	Rappahannock, April–May 2021: Denied access to law library and legal counsel during critical period after father’s death; emotional distress and legal disadvantage.	Rappahannock, April–May 2021	\$10,000
52	Deprivation of Legal Access	Mental	Yes	Yes	MDC Brooklyn, 2022–2025: Denied law library access, legal mail, and legal counsel during repeated lockdowns and solitary confinement; emotional distress and legal disadvantage.	MDC Brooklyn, 2022–2025	\$20,000
53	Deprivation of Medical Records	Both	Yes	Yes	CVRJ, July–August 2021: Medical records failed to follow during transfer to CVRJ, resulting in lack of continuity of care and exacerbation of conditions.	CVRJ, July–August 2021	\$10,000

#	Tort	Phys/ Mental/ Both	Consp	Aggrav	Description	Citation to Stmt of Facts	Damages
54	Deprivation of Medical Records	Both	Yes	Yes	NNRJ, October 2021: Medical records withheld/lost during transfer to NNJRJ, resulting in lapses in care and exacerbation of conditions.	NNRJ, October 2021	\$10,000
55	Deprivation of Medical Records	Both	Yes	Yes	Lewisburg, 2022: Medical records withheld/lost during transfer to Lewisburg, resulting in lapses in care and exacerbation of conditions.	Lewisburg, 2022	\$10,000
56	Deprivation of Medical Records	Both	Yes	Yes	MDC Brooklyn, 2022–2025: Medical records withheld/lost during transfer to MDC Brooklyn, resulting in lapses in care and exacerbation of conditions.	MDC Brooklyn, 2022–2025	\$10,000
57	Denial of Aftercare/Rehabilitation	Both	Yes	Yes	DC Jail, March–April 2021: No aftercare or rehabilitation provided for injuries sustained in DC Jail assault (orbital fracture, head trauma, kidney injury); ongoing pain and risk of further injury.	DC Jail, March–April 2021	\$50,000
58	Denial of Aftercare/Rehabilitation	Both	Yes	Yes	CVRJ, September 2021: No aftercare or rehabilitation provided for concussion and head trauma after cell extraction at CVRJ; ongoing pain and risk of further injury.	CVRJ, September 2021	\$45,000
59	Denial of Aftercare/Rehabilitation	Both	Yes	Yes	NNRJ, October 2021: No aftercare or rehabilitation provided for injuries sustained in NNJRJ assault (broken orbital, stab marks, concussion); ongoing pain and risk of further injury.	NNRJ, October 2021	\$50,000
60	Denial of Aftercare/Rehabilitation	Both	Yes	Yes	Lewisburg, 2022: No aftercare or rehabilitation provided for untreated shingles and persistent blood clots at Lewisburg; permanent numbness and ongoing pain.	Lewisburg, 2022	\$20,000

#	Tort	Phys/ Mental/ Both	Consp	Aggrav	Description	Citation to Stmnt of Facts	Damages
61	Denial of Aftercare/Reh abilitation	Both	Yes	Yes	MDC Brooklyn, 2022–2025: No aftercare or rehabilitation provided for chronic pain, vision loss, and unresolved injuries at MDC Brooklyn; ongoing physical deterioration.	MDC Brooklyn, 2022–2025	\$50,000
62	Entrapment Claim under §1495	Both	Yes	Yes	Four years detention in violation of Fifth Amendment Due Process rights.	All Prisons 2021-2025	\$200,000

Total Number of Tort Instances Identified: 62

| TOTAL DAMAGES | \$17,890,000.00 |

EXHIBIT C

MEDICAL RECORDS

Medical Records will be made immediately available upon request. Doctors and nurses identified in medical records – shall be supplemented.

FORMER PROSECUTORS / POTENTIAL DEFENDANTS

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DC Jail: Corporal Hayes (potential defendant)

CVRJ potential witnesses include:

Ronnie Davis, rdavis@cvrj.org

Deidre Lewis, dlewis@cvrj.org

Frank E. Dyer, fdyer@cvrj.org

And

Sgt. Whetzler, Virginia State Police

NNRJ potential defendants include:

NNRJ: James R. Dudley, M.D. (NNRJ Doctor, potential defendant)

Captain English, (potential defendant)

Ted Hull, ted@nnrj.state.va.us (potential defendant).

United States Marshalls Service

Derek Haywood, U.S. Marshalls Service, Derek.Haywood@usdoj.gov

Jamie Hamilton, U.S. Marshalls Service, Jamie.Hamilton2@usdoj.gov

OTHER WITNESSES

Raechel Genco, (267) 383-5774 (girlfriend).

Former counsel to Ryan Samsel including

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FORMER INMATES

Jake Lang

Dominic Pazzulo

Doug Jenson

Jessica Walkins

Zack Rehl

Richard Barnet

Mike Curzo

Additional inmates to be supplemented.

EXHIBIT D

November 14, 2025

Ryan Samsel
743 Corson St.
Bristol, PA 19007
(267) 497-6413

To Whom It May Concern:

Peter G Haller is my attorney with regard the injuries I sustained while a prisoner, and particularly with regard to the FTCA claim notice form SF95.

Sincerely,



Ryan Samsel (Nov 14, 2025 15:10:36 EST)

Ryan Samsel