

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA
WASHINGTON D.C.

UNITED STATES OF AMERICA,
Plaintiff,

Vs.

CASE NO.: 1:2021-CR-00292-RCL-1

CHRISTOPHER J. WORRELL,
Defendant.

**SUPPLEMENT TO DEFENDANT’S REQUEST TO REVOKE THE ORDER OF
DETENTION**

The Defendant Christopher Worrell, by and through his counsel, tenders this motion to Supplement to Defendant’s request to revoke the order of detention and order his immediate release with appropriate conditions to seek proper medical care.

I. INTRODUCTION

Mr. Worrell has been battling non-Hodgkin’s lymphoma on and off since 2007. He was undergoing treatment for this dangerous cancer of the immune system when he was arrested on March 12, 2021, and detained without bail. Since the day he was detained, the Government has expressly prevented him from continuing this treatment—the Government’s doctors insisted on pursuing a different course of treatment. However, after almost eight months in custody, Mr. Worrell has received *no cancer treatment*.

When Mr. Worrell suffered a broken hand in May, Government doctors said he needed surgery. Yet, as of this writing, the Government has done nothing other than give Mr. Worrell a splint and some *anti-inflammatories* (i.e. Tylenol). The Government has repeatedly promised Mr. Worrell, his counsel, and this Court that it would attend to Mr. Worrell’s serious medical needs. Instead, the Government has shown deliberate indifference to his plight: Mr. Worrell is approaching his eighth month in custody and has yet to receive *any* significant treatment. Indeed,

it is unclear when—if ever—the Government will give Mr. Worrell the necessary and lifesaving medical attention that he desperately needs. In sum, the Government's consistent and unremitting failure to provide medical treatment is a clear violation of Mr. Worrell's Fifth Amendment right to Due Process.

Since the filing of the original motion seeking revocation of the detention order, the DC Jail has been held in contempt of court, admittedly engaged in a concerted effort to misrepresent to this Court, and prompting this Court to mandate the Office of the Attorney General to utilize their resources to investigate the jail for possible civil rights violations concerning – at a minimum -- the medical care of Mr. Worrell and his fellow inmates.

The only remedy for such violations is release from detention. Accordingly, Mr. Worrell respectfully requests that this Court revoke Mr. Worrell's detention and order him released with appropriate conditions.

II. STATEMENT OF FACTS

Mr. Worrell is currently held in pretrial detainment without access to proper medical care and without access to his prescribed cancer medication, or the regular examination(s) and treatment necessary for someone with non- Hodgkin's lymphoma. His condition is rapidly deteriorating – and indicative of Stage three cancer -- he is developing lesions on the skin of his face, neck, back, arms, and legs.¹

Mr. Worrell was arrested in the Middle District of Florida pursuant to a warrant issued from Washington, D.C. on March 10, 2021. On March 12, 2021, Mr. Worrell was arrested. Mr. Worrell received telephonic notice of the warrant, and, within four hours or less, Mr. Worrell

¹ The undersigned viewed lesions on Mr. Worrell's face and neck. An attempt to take photos via Webex was of no benefit.

returned to Naples, Florida from Ocala, Florida to allow law enforcement to effectuate the arrest. On March 19, 2021, Mr. Worrell appeared with counsel before Chief Judge Howell for his initial appearance and detention hearing. The Court denied bail and conditional release.

From the date of his arrest, Mr. Worrell had been held at the Charlotte County Jail in Punta Gorda, Florida and subsequently transferred to Grady County Jail, Oklahoma, Northern Neck Jail, Virginia, and finally to Central Treatment Facility, Washington, D.C. where he remains incarcerated today. Mr. Worrell was promised immediate medical treatment upon his arrival in D.C. by Judge Howell. A promise to date, which has been unfulfilled.

Mr. Worrell filed an emergency motion for reconsideration of the detention order on March 26, 2021, which was denied on April 6, 2021. Mr. Worrell filed a second emergency motion for reconsideration on May 11, 2021, which was denied on June 3, 2021. The third Emergency Motion to Revoke Detention is currently pending. The undersigned supplements the Third Emergency Motion.

Mr. Worrell is still being detained without access to proper medical treatment of his non-Hodgkin's lymphoma. As time progresses, Mr. Worrell is experiencing a rapid deterioration to his physical and mental health, and his cancer is spreading. Mr. Worrell continues to develop lesions that are increasingly spreading on his body including his face, neck, back, arms, and legs. While detained, Mr. Worrell also contracted COVID-19 on or about April 10, 2021. To date, Mr. Worrell still has not received proper treatment and until Court intervention, receipt of full copies of medical records has been difficult. During the last few weeks, attachments (to the records), as well as supplemental records have been received, despite not being produced with the "entire medical file."

The following is a timeline regarding Mr. Worrell's medical treatment while he has been

detained:

1. 4/13 Intake to DC Jail—tested positive for COVID-19.
2. 4/15 Dr. Rucker provided Rx to DC Jail.
3. 4/16 Severe chest pain on the left side—40 minutes before officer on POD woke up and responded.
4. 4/16 Complaint listed “dry cough.”
5. 4/16 Documented as observed for several hours—was actually placed in quarantine cell.
6. 4/16 Roughly, eight and a half hours after complaining of chest pains, Mr. Worrell was transported to Howard University
7. 4/19 DC Jail received medical records from Florida Cancer Specialist.
8. 4/20 DC Jail called Moffit, ended call as they were placed on hold.
9. 4/21 Florida Cancer Specialist reported they faxed records three times and received ‘error message.
10. 4/22 Mr. Worrell submitted complaint about back pain regarding [insert]—was never seen by medical.
11. 4/28 DC Jail consulted with Dr. Rucker (his private sector physician) agreeing to continue consider Dr. Rucker’s prescribed treatment
12. 4/30 Mr. Worrell submitted complaint regarding back and neck pain due to [insert] requested extra and/or new mattress, request was declined.
13. 5/3 Mr. Worrell submitted medical visit request for back pain. Mr. Worrell was never taken to medical, visit is reported as ‘cancelled as no show.’
14. 5/4 Mr. Worrell submitted medical visit request for back pain. Appointment was cancelled.
15. 5/5 Dr. Mitchell acknowledge Mr. Worrell’s condition of non-Hodgkin’s lymphoma and the rarity of condition—advised the need for oncologist care. See Exhibit “F.”
16. 5/5 Dr. Mitchell informed Mr. Worrell of Dr. Rucker’s treatment as ‘not normal standard of care.
17. 5/6 Mr. Worrell taken to medical to be treated for spider bite/infection—Dr. Crenshaw notes ‘no discharge;’ however, Mr. Worrell provided coverings of wound with green and yellow discharge. Discharge also continued after visit.
18. 5/6 Dr. Crenshaw made statement regarding Dr. Rucker’s treatment not being standard, also noted Rituximab treatment discontinued in 2016 due to severe allergic reaction.
19. 5/6 Second request for medical regarding infection on back, appointment was cancelled.
20. 5/6 Dr. Mitchell attempts to coordinate oncology appointment.
21. 5/7 Mr. Worrell submits medical visit request for dry eyes and blurry vision. DC medical provided eyedrops and scheduled ophthalmologist appointment.
22. 5/12 Mr. Worrell submits medical complaint of urinary hesitancy (To date, no response).
23. 5/12 Mr. Worrell requested medical diet for nutrition, request was denied as ‘not a candidate for medical diet²

² Diet is important while fighting cancer; A diet with lean proteins, fruits, vegetables, whole-grains, and low-fat dairy is preferred, and it is recommended a limit to sugar, caffeine, salt, and alcohol. Mr. Worrell has asked for dietary accommodations (no more different than dietary religious restrictions) and has been denied. Additionally, his dental issue causes pain, and also interferes in his nutrition

24. 5/12 Infection on back returned, Mr. Worrell was taken to medical and told 'keep monitoring, treatment not possible'. Medical noted no pus or drainage; however, infection was draining.
25. 5/13 Medical noted patches on face and neck of Mr. Worrell, spots caused my untreated lymphoma.
26. 5/14 Mr. Worrell request eye drop refill, request was denied.
27. 5/15 Mr. Worrell submits second request for eyedrop refill, again, request was denied.
28. 5/15 Mr. Worrell request medical visit, appointment scheduled and later cancelled.
29. 5/16 Mr. Worrell passed out, falling, causing a break to his right hand. Medical did not acknowledge the injury for eight hours. Medical records state 'tripped over box,' however, this is inaccurate as Mr. Worrell fainted.
30. 5/17 DC jail informed Mr. Worrell he would have a follow-up with Dr. Wilson for hand surgery.
31. 5/17 Medical reports indicate Mr. Worrell 'not in pain' during return; however, Mr. Worrell was never seen by medical upon return.
32. 5/19 Infection on back returned, yellow discharge with blood. Medical visit denied.
33. 5/19 First oncology appointment (37 days after arrival in DC).
34. 5/19 Medical informed Mr. Worrell 'treatment will be prescribed if condition continues' despite the fact Mr. Worrell has active lymphoma.
35. 5/19 Medical notes 'unspecified injury to right wrist, hand, and fingers.'
36. 5/24 During medical visit, Mr. Worrell was informed a follow-up appointment has not been made for Dr. Wilson regarding the broken hand.
37. 5/25 Radiology (x-ray) of left shoulder
38. 5/28 found unconscious with head injury, evaluated, provided motrin (no radiology or ER services)
39. 6/5 Mr. Worrell receives PET scan to scan for cancer.
38. 6/7 Mr. Worrell receives bone marrow biopsy to scan for cancer.
39. 6/11 Mr. Worrell was taken to see Dr. Wilson regarding his broken hand. Dr. Wilson informed Mr. Worrell that due to the jail's delay the hand will require surgery rather than being reset in Dr. Wilson's office.
40. 6/17 Dental appointment scheduled for root canal, request for procedure denied.
41. 6/30 Discovered no ophthalmologist appointment had been made for Mr. Worrell.
42. 9/01 start of physical therapy for May shoulder injury

As of October 24, 2021, Mr. Worrell had received appointments for his lymph node [needle] Biopsy (Carcinoma), and skin biopsy (lymphoma). Dr. Wilson has recanted from his reports and notes that Mr. Worrell needs hand surgery.³ Mr. Worrell has still yet to receive *any* chemotherapy treatment, maintains a cracked tooth and has a painful broken (but healed

³ Rather than have Dr. Wilson explain his change in position, the DC Jail brought Dr. O'Donovan to the Contempt hearing to explain this "change" in position. Inexplicably, Dr. O'Donovan has NEVER physically treated Mr. Worrell nor ever seen him.

incorrectly), deformed hand.

Conveniently, and – of course – prior to Court on November 3, 2021, Mr. Worrell has received notice of an impending medical appointment. On November 1, 2021, Mr. Worrell has an unknown outside medical, with an unknown doctor. It is unclear what the nature of the appointment is for, and Mr. Worrell has grave concerns about further care with DC Jail and Howard University medical. Despite his medical provider's misrepresentations during his medical care, Mr. Worrell has been advised to attend the outside medical. But Mr. Worrell is gravely concerned about his ongoing care from provider's who have been found in contempt, investigated for civil rights violations, and whom would have no qualms about misleading this Court.

Through today, a listed summary of Mr. Worrell's health conditions are as follows:

1. Mild Blepharitis (inflammation of the eyelids)
2. Pain Left shoulder
3. Fracture of Fifth Metacarpal
4. Epidermoid Cyst
5. Urinary Hesitancy
6. Lower back pain
7. Prediabetes
8. Follicular B cell lymphoma
9. Squamous cell carcinoma of the head, neck, and base of tongue
10. History (Hx) of COVID symptoms
11. Hypertension
12. Dental – cracked molar - needs root canal, recommended for extraction instead of root canal.

As guidance for proper medical care, this Court can look to policies of the Bureau of Prisons (hereinafter the "BOP"). The BOP designates four levels of inmate care. An inmate – such as Worrell – who needs active chemotherapy, would be designated a Care Level 4 inmate. This level is reserved for inmates who are on active cancer treatment, dialysis, quadriplegia,

stroke, or head injury patients, major surgical treatment, and high-risk pregnancy.⁴ There are 122 Federal prisons in the United States, of which 6 are capable of treating Care level 4. These 6 facilities allegedly also have the proper staffing and medical providers necessary to administer constitutionally proper care.⁵

The DC Jail has been found in contempt of court, and the United States Marshalls via The Office of the Attorney General has been prompted to investigate the jail for possible civil rights violations. The United States Marshall's Office did spend two days inside of the DC jail after the Courts request.

III. LEGAL STANDARD

The Fifth Amendment's Due Process Clause protects pretrial detainees against the deprivation of life or liberty "without due process of law." *See U.S. v. Cole*, 459 F. Supp. 3d 116, 123 (D.D.C. 2020) (citing *Bell v. Wolfish*, 441 U.S. 520, 535 n.16 (1979)). The failure to provide medical treatment is inconsistent with contemporary standards of decency, and violates Due Process. *Anderson, v. Dist. of Columbia*, 317 F. Supp. 3d 444, 447 (D.D.C. 2018) (citing *Estelle v. Gamble*, 429 U.S. 97, 104 (1976)). Indeed, "Due Process [] **requires** jails to provide medical care to detainees who need it." *Id.* (citing *City of Revere v. Mass. Gen. Hosp.*, 463 U.S. 239, 244–45 (1983)) (emphasis added).

Where—as here—the denial of medical care “rise[s] to the level of a due process violation,” the Fifth Amendment requires the court to revoke a prior detention order and release the detainee. *Id.* at 123–24. Here, the government has known that Mr. Worrell is battling cancer since the first day of his detention. The Government has repeatedly told this Court

⁴ From the Bureau of Prisons “Care Level Classification for Medical and Mental Health Conditions or Disabilities”

⁵ But even medical facilities with the BOP are not beyond reproach, as Butner was one of the most deadly prisons for inmates during COVID, as 25 inmates died, making this “Care Level 4” medical facility a deathtrap. <https://www.newsobserver.com/news/coronavirus/article244131227.html>

that it would ensure Mr. Worrell receives treatment. Yet, after detaining Mr. Worrell for nearly eight months, the Government has given him *substandard, limited care, and no chemotherapy*. At best, this pattern of substandard care and withholding of treatment shows deliberate indifference to Mr. Worrell's plight; at worst, it shows an affirmative desire to inflict harm. Either way, it is a clear due process violation. *Cf. Scalia v. Cty. of Kern*, 308 F. Supp. 3d 1064, 1072–77 (E.D. Cal. 2018) (failure to diagnose head injury following fall constituted violation of due process). Accordingly, this Court must order Mr. Worrell's immediate release from detention.⁶

IV. THIS COURT SHOULD ORDER MR. WORRELL'S RELEASE FROM DETENTION BECAUSE THE GOVERNMENT'S ONGOING FAILURE TO TREAT HIS BROKEN HAND AND FAILURE TO TREAT HIS CANCER IS A CLEAR VIOLATION OF DUE PROCESS

The Due Process Clause imposes obligations on the government to meet the basic needs of the people it jails, who rely on the government for food, clothing, and necessary medical care. A failure to provide sustenance for inmates “may [] produce physical ‘torture or a lingering death.’” *Estelle v. Gamble*, 429 U.S. 97, 103 (1976) (internal quotation omitted).

The due process rights of a pretrial detainee “are at least as great as the Eighth Amendment protections available to a convicted prisoner.” *City of Revere v. Mass. Gen. Hosp.*, 463 U.S. 239, 244 (1983). Those rights are violated if he is “incarcerated under conditions posing a substantial risk of serious harm,” and the “state of mind is one of ‘deliberate indifference’ to inmate health or safety.” *Farmer v. Brennan*, 511 U.S. 825, 834 (1994) (internal citation omitted); *see, e.g., Hardy v. District of Columbia*, 601 F.Supp.2d 182, 190 (D.D.C. 2009) (violation of constitutional rights of pretrial detainee if the officials “knowingly

⁶ The undersigned would advise that substantial portions of the facts and legal arguments were from John Pierce, Esquire, prior submissions.

disregarded a substantial risk of serious harm of which they were aware”). Stated another way, To establish a claim for unconstitutional deprivation of medical treatment, Mr. Worrell need only establish that: (1) his medical need is serious; and (2) that jail officials were deliberately indifferent to his medical need. *Anderson*, 317 F. Supp. 3d at 447. To establish deliberate indifference, Mr. Worrell need only show that jail officials had knowledge of his serious medical need and recklessly disregarded the risk that it posed to his health and safety. *Id.*

Continuing to detain Mr. Worrell if alternatives exist to protect the community and prevent flight while placing Mr. Worrell in mortal danger constitute deliberate indifference to Chris’s health and safety. Mr. Worrell’s incarceration, under these new circumstances, constitutes an independent due process violation that the Court must remedy.

A. Mr. Worrell Has Established That His Medical Need Is Serious

In May of 2021, Mr. Worrell was found unconscious and rushed to emergency medical. Amongst other issues, Mr. Worrell complained of right-hand pain. Mr. Worrell was found to have a right hand “fracture,” a break of the 5th Metacarpal. On June 11, 2021, [Orthopedic] Dr. Wilson recommended a surgical repair. Exhibit “A, Dr. Wilson surgical Recommendation.” This report was reviewed by Dr. Margaret Crenshaw (Jail Medical Director), who reviewed Dr. Wilson’s report and signed the records with a surgical recommendation. See Exhibit “B, Dr. Crenshaw Report signed June 16, 2021.” On October 13, 2021, Radiology noted the “deformity,” and indicated an “old healing fracture.” See Exhibit “C, Radiology report of right hand.” The deformity remains painful and can be seen in the photographs taken by counsel on October 29, 2021 (via cell phone camera over Webex). See Exhibit “D, photos of the hands of Mr. Worrell showing the deformity on the right hand.

Inexplicably, and despite his original surgical opinion, Dr. Wilson changed his medical

opinion. To Mr. Worrell's detriment, this failure to treat the broken hand, and changing of opinion after five months, could lead to Mr. Worrell having a significant, permanent deformity, as well as having to live with constant nagging pain.⁷

Of primary concern, Christopher Worrell has non-Hodgkins Lymphoma. Mr. Worrell was treating – in an aggressive and ongoing manner – from October 2020. Mr. Worrell was arrested in March of 2021. The Courts and each jail facility's medical personnel were advised Mr. Worrell suffers from active, aggressive, and on-going lymphoma. Despite a course of care which was to confirm the return of Carcinoma (which according to the records Mr. Worrell had not suffered since 2007), the jail has – at a snail's pace – sought to treat his Stage three non-Hodgkins lymphoma.

In non-Hodgkins Lymphoma, the affected lymphocytes multiply in an abnormal way and being to collect in certain parts of the lymphatic system. The affected lymph glands lose their abilities to aid in fighting infection, making a sufferer more prone to infection. This cancer does not limit to the lymph nodes, and other parts of the body can experience lymphocyte tumors. Three of ten sufferers do not survive (despite receiving treatment). Mr. Worrell has received prior biopsies⁸, and Oncology has requested an excisional biopsy.⁹ An excisional biopsy -- the most direct method to test for Lymphoma -- requires incision, where

⁷ The Defendant complained, via grievance, of the care of his hand. See Exhibit "G." Not a single member of medical staff, to include Dr. Wilson advised of a change in his treatment plan being anything other than surgery.

⁸ The prior completed biopsies would address carcinoma. An excisional biopsy is necessary for Non-Hodgkins Lymphoma, and to date, has yet to be conducted.

⁹ The Court should note, Dr. Ali, the oncologist, recommended an excisional biopsy on June 16, 2021. Despite the jails attempts to indicate Worrell is causing delay, and insinuating Worrell made the request, the records indicate yet another misrepresentation and falsehood told by the jail. See Exhibit "E, Nurse Practitioner Report of Gayle Juenemann indicating patient wants excisional biopsy prior to chemotherapy, and the Report signed by Dr. Crenshaw on June 16, 2021, indicating Dr. Ali request ENT (ear, nose, throat) for an excisional biopsy." Maybe the jail should explain why it took five months for the excisional biopsy to occur (allegedly scheduled for November 1, 2021, the jail attempts to blame-shift their own malfeasance, and maybe this Court should consider contempt for misrepresentations to this Court about who is really causing such delay.

they remove portions of healthy tissue and/or remove a “lump or suspicious area” for additional review. Chemotherapy is the only possible course of treatment. The cost of the chemotherapy drugs recommended is over \$43,000.00 (for the drugs alone). This does not include the costs of the medical personnel needed to administer the chemotherapy, and to monitor his ongoing, chronic, life-threatening condition. The chemotherapy will decimate an already weakened immune system leaving Mr. Worrell at the mercy of the dirty, unsanitary, COVID filled environments. This treatment should be done by an oncologist, of which there is NOT one on staff at the DC Jail. Note, the treatment usually requires other specialists such as physician assistants, nurse practitioners, nurses, nutrition specialists, and other health professionals.¹⁰ This level of care has not been available.

B. Mr. Worrell Has Established That the Government’s Failure to Obtain Treatment for His Cancer and Broken Hand Constitutes Deliberate Indifference

The DC Jail has already been held in contempt of Court. It is not clear whether those officials in control of the inmates (and more specifically any “Jan 6” inmates) can even sit before this Court and tell the truth on any issue of the care of Mr. Worrell or other January 6 inmates. Medical providers have [at best] waived, and possibly outright have misrepresented their positions, causing a loss of faith in all of Mr. Worrell’s medical care. Mr. Worrell has been in jail for eight (8) months, with the Government knowing he has non-Hodgkins Lymphoma. Everyday Mr. Worrell goes without care for his cancer, which is Stage three at best (based on the chemotherapy recommendation), Mr. Worrell is closer to becoming statistic of the thirty percent who do not survive.

¹⁰ The Jail recognizes the difficult nature of Mr. Worrell’s cancer by indicating – in response to Mr. Worrell’s possible desires for other types of treatments, “that Understandably, as a rare disease with few cases, robust evidence for different therapies is hard to come by. However, this underscores the need for the patient’s care to be managed by an oncologist.” See Exhibit “F, signed report of Dr. Crenshaw dated May 7, 2021.”

Additionally, the DC Jail has demonstrated that even for any medical task, such as dental, the broken bone in the hand, physical therapy (for the shoulder), and receiving OTC medication is a task and burden such that the jail only pursues “aggressive” courses of care when this Honorable Court seeks to inquire as to a status or takes an interest in why things are not getting done. The jail does have a grievance procedure in place. This policy is generally cumbersome, and takes several days for resolution. It would not be an appropriate process designed for an inmate with life-threatening medical conditions such as cancer, and clearly not designed for an inmate whose recommendation is life-saving chemotherapy. This list, for example, is a list of Mr. Worrell’s cancelled appointments – generally without explanation – by the jail (See attached as Exhibit “H, records reflecting cancelled appointments):

Date:	Person who cancelled:	time:	Basis (if known)
4/22/21	Anju Menon	@ 1818 hours	(had active COVID – after a 4/13/21 positive test -- and was still in COVID quarantine) Page 242
5/3/21	Terry Nguyen	@ 1457 hours	(added to list late, no transport, needed reschedule, considered a “no-show” by Dr. Hguyen) Page 213
5/4/2021	Nicole Morrison	@ 0913 hours	(cancelled)(no explanation) Page 212
5/6/2021	Anju Menon	@ 1117 hours	(cancelled)(notes indicate “URGENT – PATIENT MUST BE SEEN!!!!!! / CTF”) Page 192
5/15/2021	Joyce Oppong	@ 2032 hours	(cancelled)(no explanation) Page 172
5/26/2021	Kamilah Ray-Boyd	@ 1413 hours	(cancelled)(no explanation) Page 153
6/2/2021	Joyce Oppong	@ 1251 hours	(cancelled)(no explanation) Page 134
6/4/2021	Kamilah Ray-Boyd	@ 1209 hours	(cancelled)(“seen by CC provider”) Page 128
6/4/2021	Dr Margaret Crenshaw	@ 1210 hours	(cancelled)(was not transported to doctor so listed as a no-show) Page 127
6/5/2021	Joyce Oppong	@ 0937 hours	(Cancelled)(no explanation; possibly due to “no sick slip filed 5/31/21”) Page 126
6/11/2021	Nicole Morrison	@ 0945 hours	
6/23/2021	William Bowles	@ 1049 hours	(cancelled)(rescheduled)(“no explanation”) Page 101
7/3/2021	Medical request to see		(cancelled)(Patient requested medical visit; was not transported; documented as a refusal despite

7/15/2021	Sheila Smith	@ 1053 hours	concerns he may have court dates and does not want to miss) Page 89 (cancellation)(possibly cancelled due to Refiling eyedrops) Page 85
08/21/2021	Debreaka Posey	@ 1653 hours	(cancelled)(no explanation given)(possibly because refill prescriptions were provided) Page 68
09/03/2021	Nicole Morrison	@ 0950 hours	(cancelled; no explanation provided)
09/27/2021	Joyce Oppong	@ 1617 hours	(cancelled; stated “no-show” due to legal; legal would have been “a phone call, and not actual in person or video visit) Page 37
09/28/2021	Joyce Smith	@ 1733 hours	(cancelled)(sick call request cancelled) Page 35
10/25/21	Dr. Nguyen	@ 1130 hours	transported for cortisone shot, no shot given. Received shot 10/26/21

Said list begs the question, If the jail cannot handle internal medical tasks, how can they properly treat a broken hand or properly treat a regimented cancer chemotherapy protocol? The jail cannot. They can’t tell a straight story, give a straight answer, nor comply with their basic constitutional duty to constitutionally provide basic medical care, all of which causes a grave danger to the life of Mr. Worrell.

C. Mr. Worrell Has Established That the Conditions of His Detention Violate His Constitutional Rights

This Court gave the Government every opportunity – prior to the deception, contempt order, and civil rights investigation -- to manage and constitutionally take care of Mr. Worrell’s basic medical needs. Not only has the jail failed miserably, but they only respond when this Court requires their action. Mr. Worrell’s prior filings and current supplement emphasizes Mr. Worrell has established not only a serious medical need, but that the Government has shown deliberate indifference to such need, with their deceptions, their changed medical positions, and their attempts to blame everyone but themselves for this unconstitutional behavior.

V. SUGGESTED PRETRIAL RELEASE CONDITIONS

The Defendant’s residence in Naples, Florida, is in the Middle District of Florida. U.S.

Probation maintains a Naples, Florida office on a main thoroughfare in Naples, Florida. The location is easily accessed, and centrally located. While the Middle District of Florida is an expansive District, Mr. Worrell needs only limited ability to travel [it]. Mr. Worrell would need some ability to maintain employment (if his health during chemotherapy allows), which is in Bradenton, Florida. Additionally, Worrell would access to his counsel (offices in Tampa, Florida. The need for structure or appointments to support said release and travel is of no-consequence and clearly within the norm of pre-trial release. Lastly, Mr. Worrell has a minor child, and he would like to have some ability to participate in time-sharing, which would entail providing transportation for the minor child to start and end time-sharing.

To those ends, Mr. Worrell proposes:

1. The Defendant appear at all court appearances;
2. The Defendant must not, for any purpose, for any reason, leave the MD of Florida without first obtaining written permission; The MD of Florida consists of the following counties: The Middle District of Florida consists of the following Florida counties: Baker, Bradford, Brevard, Charlotte, Citrus, Clay, Collier, Columbia, DeSoto, Duval, Flagler, Glades, Hamilton, Hardee, Hendry, Hernando, Hillsborough, Lake, Lee, Madison, Marion, Manatee, Nassau, Orange, Osceola, Pasco, Pinellas, Polk, Putnam, Sarasota, St. Johns, Seminole, Sumter, Suwanee, Union, and Volusia.
3. The Defendant cannot change his present address without permission of the Court;
4. The Defendant shall not commit any new crime while on pretrial release, and the Defendant shall immediately notify pretrial release if arrested;
5. The Defendant shall report to the US Probation Office in Naples, Florida by telephone or as directed by the Office;
6. Allow Worrell's passport to continue to be maintained by the Federal Court;
7. The Defendant shall commit to the supervision of the HISP (High Intensity Supervision Program).
8. Allow Worrell personal recognizance (if the Court orders HISP).
9. Mr. Worrell, needing pre-approved, would ask to:
 - Maintain travel (locally, or to Tampa) for appointments with counsel;
 - Travel to and from physicians;
 - Be employed and travel for work / or as below (if health allows);
 - Religious observances;
 - Maintain time-sharing with his minor child:
 1. Travel to start and end time sharing;
 2. Take the minor child to school and/or pick him up from school;

3. Attend son's athletic events (if his chemotherapy condition allows);
4. Take the minor child to ROTC, possibly wait for completion of activity, and pickup of the same (if his chemotherapy condition allows).

CONCLUSION

Based on the foregoing reasons, Mr. Worrell respectfully requests this Supplement the Record, and based on the foregoing, release Mr. Worrell with appropriate conditions.

ALEX R. STAVROU, ESQ.

ALEX R. STAVROU, ESQUIRE

Alex R. Stavrou, P.A.

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Certificate of Service

I HEREBY CERTIFY, that a true and correct copy of the foregoing Notice of Appearance was sent via ECM filing to the United States Attorney Office for the District of Columbia on this 31st day of October, 2021.

ALEX R. STAVROU, ESQ.

ALEX R. STAVROU, ESQUIRE

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EXHIBIT "A"

Central Detention Facility

1901 D Street, SE Washington, DC 20003
Fax:

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Chronic Care Clinic

CHRISTOPHER WORRELL

Male DOB: 06/26/1971

377183

Home: 377183

06/10/2021 - TextNote: sc

Provider: Tamela Clinkscale

Location of Care: DC JAIL MMHS

This document contains external references

Electronically Signed by Tamela Clinkscale on 06/10/2021 at 3:38 PM

06/10/2021 - Urgent Care: Patient Return Ortho (Wilson)

Provider: Charles Sarbeng - DNP

Location of Care: Correctional Treatment Facility

Patient Return

Hospital: HUH

Return Type: Outside Consultation

Comments: patient returned from HUH ortho with Dr Wilson. Report

Diagnosis: right small finger metacarpal diaphyseal fracture sustained 21/2 weeks ago.

Recommended surgical fixation. Obtain pre-op labs, cbc, bmp, covid test, urine drug screen, ekg, cxt, call orthopedic clinic at (202)-865-1183 for any question.

referral generated

labs ordered

covid screening, EKG and CXR pending surgery date

Process Orders

Check Orders Results:

LabCorp: ABN not required for this insurance.

Tests Sent for requisitioning (June 10, 2021 1:54 PM):

06/10/2021: LabCorp -- CBC With Diff [005009] (signed)

06/10/2021: LabCorp -- Basic Metab Panel [322758] (signed)

Electronically Signed by Charles Sarbeng - DNP on 06/11/2021 at 9:30 AM

06/11/2021 - Append: Patient Return Ortho (Wilson)

Provider: Charles Sarbeng - DNP

Location of Care: Correctional Treatment Facility

EXHIBIT "B"

DC JAIL MMHS

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Chronic Care Clinic

CHRISTOPHER WORRELL

Male DOB: 06/26/1971

377183

Home: 377183

tumor involvement

- after patient visit, case was discussed with Dr. Ali (pt's oncologist at HUH) and he recommended further eval of these lymph nodes by ENT for possible excisional biopsy
- still awaiting skin biopsy with dermatologist
- treatment plan to be determined based on the results of these biopsies
- ENT referral generated, will schedule ASAP; will review plan with pt next visit

SQUAMOUS CELL CARCINOMA OF THE HEAD, NECK AND BASE OF TONGUE, 2007.

-no e/o recurrence in recent scans

FRACTURE OF FIFTH METACARPAL BONE, RIGHT HAND.

-awaiting OR date

HYPERTENSION.

- BP at goal today
- c/w current regimen

Risks, benefits, and alternatives to treatment plan discussed.

Follow-up: 2 days.

Problems reviewed today.

Medications reviewed today.

Allergies reviewed today.

Directives reviewed today.

Electronically Signed by Margaret Crenshaw - MD on 06/16/2021 at 2:28 PM

06/14/2021 - TextNote: Communication with Dr. Ali (Onc)

Provider: Margaret Crenshaw - MD

Location of Care: Correctional Treatment Facility

6/14/21

-Called and spoke with pt's oncologist Dr. Ali on 6/14/21. Dr. Ali had not had a chance to review the recent bone marrow and PET/CT results. These were faxed to Dr. Ali who states he will call back with recommendation for next steps.

6/15/21

-have not yet heard back from Dr. Ali regarding an updated POC, called the number on file for his MA, no answer
-will try again tomorrow

6/16/21

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

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#. L shoulder pain
-not addressed today, awaiting PT

Review of Systems

General: Patient denies chills, fatigue, malaise.

Cardiovascular: Patient denies chest pain.

Respiratory: Patient denies cough.

Vital Signs

Height: 75 in.

Weight: 253 lbs.

BMI: 31.74

Temperature: 97.7 degrees F

Temp Site: Oral

Respirations: 16

Pulse Rate: 70

Rhythm: Regular

Blood Pressure: 103/77 mm Hg
(mm Hg)

Pulse Ox: 98%

Physical Exam

General Appearance

Comfortable, NAD

Neck

Neck: no palpably enlarged lymph nodes

Respiratory

Effort: Normal

Musculoskeletal

Gait & Station: Normal

Skin

Inspection: scattered erythematous patches w some induration most noticable posterior to and below the right earlobe, along the hairline over his left eyebrow, and below his left earlobe

Mental Status and Exam

Mood & Affect: Normal

Assessment and Plan

Hypertension Control: Controlled

Assessment/Plan:

FOLLICULAR B CELL LYMPHOMA WITH RECURRENCE.

-recently re-established care with oncology last month and working on re-staging

-bone marrow biopsy done and WNL

-PET/CT done with new mildly active right submandibular and left upper cervical lymphnodes c/f possible

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

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(ICD10-C80.1)
HX OF COVID-19 (ICD10-U07.1)
HYPERTENSION (ICD-401.9) (ICD10-I10)

Current Medications:

METOPROLOL TARTRATE 25 MG ORAL TABLET (METOPROLOL TARTRATE) Take 1 tab P.o bid.
ASPIRIN 81 MG TAB (ASPIRIN) Take one tab po Qdaily.
ANALGESIC BALM OINT (LINIMENTS OINT) AAA bid prn.x10 dys First dose now; Route: EXTERNAL
CVS DRY EYE RELIEF 0.2-0.2-1 % OPHTHALMIC SOLUTION (GLYCERIN-HYPROMELLOSE-PEG 400) 1-2 gtt in eyes prn; Route: OPHTHALMIC
IBUPROFEN 600 MG ORAL TABLET (IBUPROFEN) Take one tab po TID as needed for pain. take medication with food to avoid GI upset; Route: ORAL
LIDOCAINE HCL 2 % EXTERNAL GEL (LIDOCAINE HCL) apply to affected area bid prn for pain; Route: EXTERNAL

Current Allergies:

* PERCOCET: HIVES (Critical)

Other HPI

- #. Primary cutaneous follicular b cell lymphoma
 - initially diagnosed in 2007 and treated initially with rituximab
 - with subsequent recurrence and treatment again with rituximab with development of an allergic vs infusion reaction
 - recurrence documented again in 2019 which was the last time the pt had imaging but did not undergo the oncology-recommended treatment at that time but instead was following with an alternative medicine provider who prescribed topical rapamycin and naltrexone
 - the patient currently has skin lesions on his face, neck, and upper chest
 - the patient was seen by HUH oncology on 5/19/21 to re-establish oncology care
 - recommendations were for a repeat skin bx, bone marrow bx and PET/CT for interim staging
 - bone marrow biopsy was completed 6/2021 and is WNL
 - PET/CT scans done 6/2021, results reviewed with patient today
 - significant for findings of "mildly active" right submandibular and left upper cervical lymph nodes c/f possible lymphomatous/tumor involvement
 - no e/o metastatic disease or malignancy in the chest, abd, pelvis or intracranially
 - these lymph node findings are apparently new since the pt's last PET scan done in 2019

- #. SCC of head/neck, base of tongue
 - treated with surgery, chemo, and XRT in 2007
 - 6/2021 PET /CT without any c/f recurrence

- #. R 5th metacarpal neck fracture
 - seen by Dr. Wilson (ortho hand) and rec'd for surgical repair
 - awaiting OR

- #. HTN, h/o tachycardia
 - on metoprolol h/o HTN and tachycardia
 - BP and HR WNL today

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

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Home: 377183

Electronically Signed by Tamela Clinkscale on 06/10/2021 at 4:12 PM

06/10/2021 - TextNote: sc
Provider: Tamela Clinkscale
Location of Care: DC JAIL MMHS
This document contains external references

Electronically Signed by Tamela Clinkscale on 06/10/2021 at 3:38 PM

06/10/2021 - TextNote: ORTHOPEDIC AMENED NOTE 61021
Provider: Erin Ellis
Location of Care: Correctional Treatment Facility
This document contains external references

Electronically Signed by Erin Ellis on 10/12/2021 at 3:00 PM

06/10/2021 - TextNote: ORTHOPEDIC CLINIC NOTE 6/10/21
Provider: Erin Ellis
Location of Care: Correctional Treatment Facility
This document contains external references

Electronically Signed by Erin Ellis on 10/12/2021 at 2:57 PM

06/10/2021 - Urgent Care: Patient Return Ortho (Wilson)
Provider: Charles Sarbeng - DNP
Location of Care: Correctional Treatment Facility

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CHRISTOPHER WORRELL

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-will d/w referral coordinator to ensure no visits next week

FOLLICULAR B CELL LYMPHOMA WITH RECURRENCE.

- recurrent disease, following with oncology and awaiting derm eval for biopsy
- was rec'd for PET/CT and bone marrow bx which were completed
- unable to review PET and bone marrow biopsy reports until after patient visit
- bone marrow bx reviewed showing normal bone marrow
- PET/CT results reviewed as below
- significant for mildly active R submandibular and left upper cervical lymph nodes, suspicious for lymphomatous/tumor involvement
- no e/o metastatic dz/malignancy w/i chest, abdomen, or pelvis
- no e/o intracranial metastatic disease
- results were NOT reviewed w the patient as they were obtained after his visit, will review w pt at visit next week
- call placed to Dr. Ali's (oncology) office and message left with his MA to determine if lymph node bx should be pursued prior to onc follow up
- as of this note's signing, had not received a call back
- will f/u with pt in 1 week

SQUAMOUS CELL CARCINOMA OF THE HEAD, NECK AND BASE OF TONGUE, 2007.

- recent PET/CT with no e/o soft tissue recurrence w/i the throat

HYPERTENSION - Unchanged. -BP at goal today

- c/w current regimen

PAIN IN LEFT SHOULDER.

- imaging w/o acute bony process
- PT scheduled

Risks, benefits, and alternatives to treatment plan discussed.

Follow-up: in 1 weeks.

Problems reviewed today.

Medications reviewed today.

Allergies reviewed today.

Directives reviewed today.

Electronically Signed by Margaret Crenshaw - MD on 06/11/2021 at 3:06 PM

06/10/2021 - TextNote: sc

Provider: Tamela Clinkscale

Location of Care: DC JAIL MMHS

This document contains external references

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

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Home: 377183

-xray was done which showed some mild joint narrowing but no acute process
-was prev referred to PT which is pending

Review of Systems

ROS reviewed. No changes.

Vital Signs

Height: 75 in.

Weight: 253 lbs.

BMI: 31.74

Temperature: 97.5 degrees F

Temp Site: Tympanic

Respirations: 16

Pulse Rate: 81

Rhythm: Regular

Blood Pressure: 108/73 mm Hg
(mm Hg)

Pulse Ox: 97%

Physical Exam

General Appearance

Comfortable, NAD

Respiratory

Effort: Normal

Musculoskeletal

Gait & Station: Normal

Skin

Inspection: very small healed biopsy site over right sacrum without any drainage, discharge, or erythema

Mental Status and Exam

Mood & Affect: Normal

Assessment and Plan

Hypertension Control: Controlled

Assessment/Plan:

FRACTURE OF FIFTH METACARPAL BONE, RIGHT HAND.

-following with orthopedics and recommended for surgical repair

-working to coordinate OR date and will do requested preop work up including labs, EKG, and CXR

-of note, pt has requested that he NOT be scheduled for any outside medical appointments next week so he has a chance to get the commissary order he has placed for "healthy" foods he feels he does not get on the trays

-reviewed w pt the risks of potentially delaying care, pt accepts these and reiterates his request for no outside visits next week

EXHIBIT "C"

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

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Home: 377183

This document contains external references

TRIP TICKET

Imported By: Erin Ellis 10/15/2021 9:04:58 AM

External Attachment:

Type: Image
Comment: External Document

Electronically Signed by Margaret Crenshaw - MD on 10/20/2021 at 8:30 AM

10/13/2021 - Radiology: Urgent, HAND RIGHT
Provider: Eleni O'Donovan - MD
Location of Care: Correctional Treatment Facility

Radiology Processing

X-Ray Type: Urgent, HAND RIGHT
X-Ray Group: UE
X-Ray Ordered: HAND RIGHT
Date Requested: 10/13/2021
Exam Status: Complete
Exam Date: 10/13/2021
Technologist: R. Douglas

Radiographic Report

Report Date: 10/13/2021
Exam: UE, HAND RIGHT
Findings: Clinical History: "Follow-up R 5th metacarpal neck fracture - 3V R hand hand and wrist - patient at CTF"

Technique: Frontal, oblique and lateral views of the right hand were submitted for evaluation. No prior studies available for comparison.

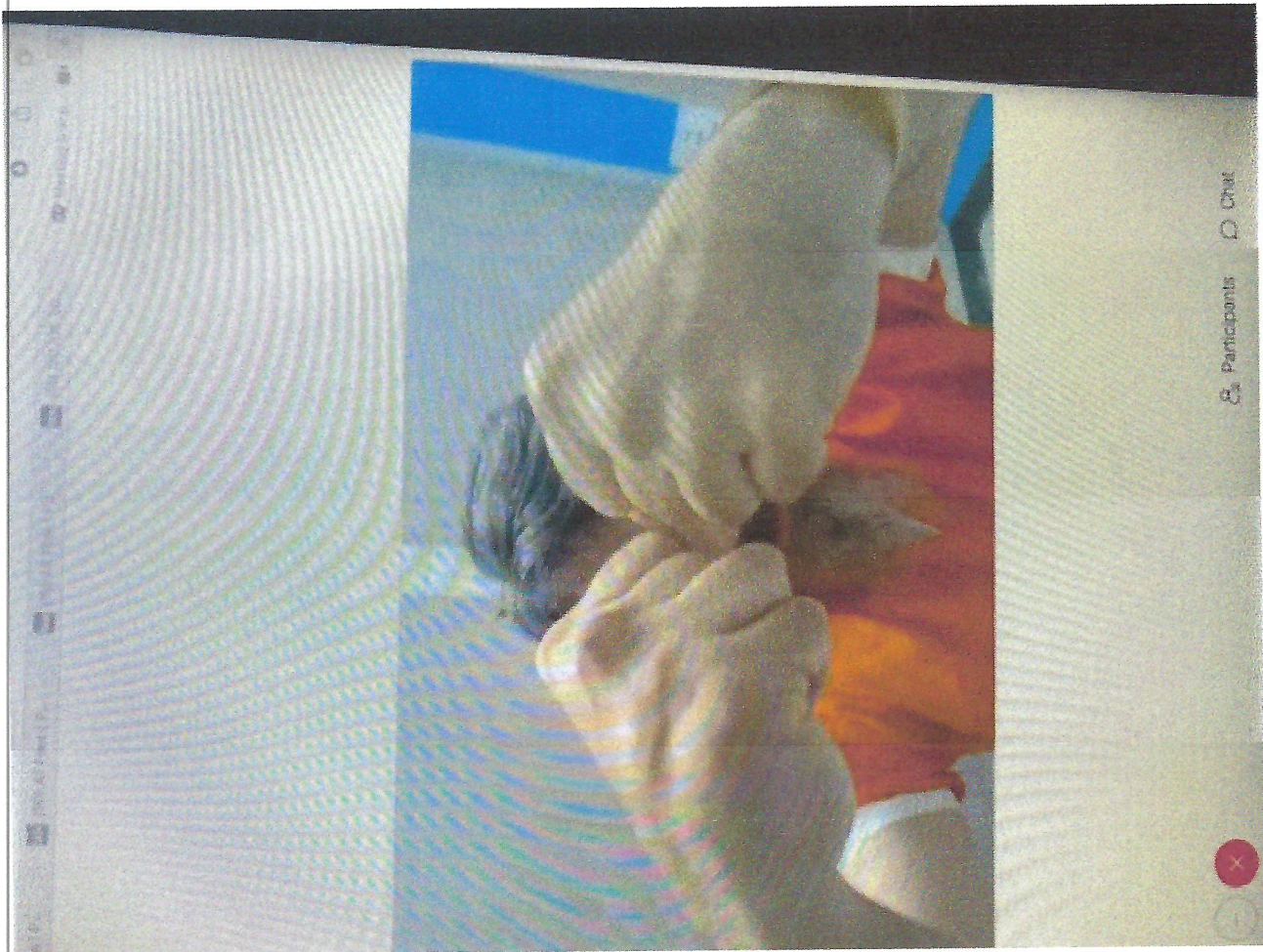
Findings: There is deformity of the shaft of the fifth metacarpal bone compatible with old healing fracture. There is mild narrowing of the radiocarpal joint. The surrounding soft tissues are grossly unremarkable in appearance.

Impression: Old healing fracture deformity of the fifth metacarpal bone as stated above.

Report Status: Complete
Radiologist: Bonnie Davis, MD

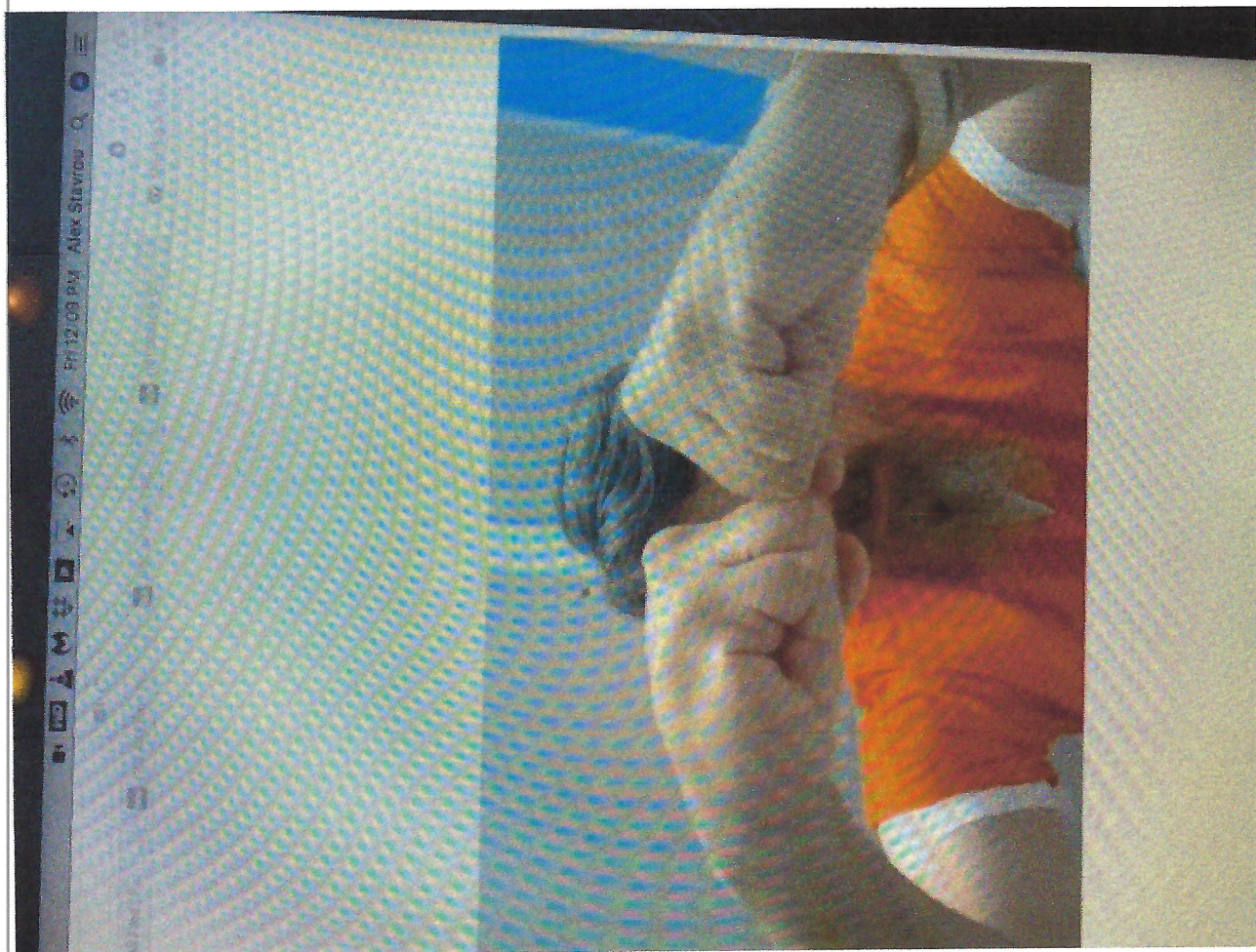
EXHIBIT "D"

Subject: (none)
Date: Saturday, October 30, 2021 at 12:57:17 PM Eastern Daylight Time
From: Alex Stavrou <alexstavrousr@icloud.com>
To: Alex Stavrou <Alex@alexstavrou.com>
Attachments: IMG_0618.jpg



Sent from my iPhone

Subject: (none)
Date: Saturday, October 30, 2021 at 10:21:39 AM Eastern Daylight Time
From: Alex Stavrou <alexstavrousr@icloud.com>
To: Alex Stavrou <Alex@alexstavrou.com>
Attachments: IMG_0619.jpg



Sent from my iPhone

EXHIBIT "E"

DC JAIL MMHS

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

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Home: 377183

Respirations: 16
Pulse Rate: 80
Rhythm: Regular
Blood Pressure: 126/86 mm Hg
(mm Hg)
Pulse Ox: 100%

10/19/2021 - Urgent Care: Patient Return - HUH Radiation Oncology
Provider: Gayle Juenemann - NP
Location of Care: Correctional Treatment Facility

Patient Return

Hospital: HUH - Radonc

Return Type: Outside Consultation

Records Received: Yes

Comments: Consultant's report: Recommend chemotherapy as soon as possible. No rad(next part of word illegible) at this time.

Referrals Written: Yes

Comments: Written consultation note provided (ppwk to be scanned in to view part of note containing HPI, ROS, and PE), see below for impression and plan.

-"Impression: Cutaneous B-cell lymphoma with recurrence.

-Plan: I will obtain the radiation therapy record from Florida to evaluate the dose of radiation that he was given at that time. As B-cell lymphoma is very sensitive to chemotherapy, I will recommend chemotherapy instead of radiation. The radiation therapy may leave lasting skin changes over the face which may affect the patient cosmesis. In addition, he had radiation therapy in the past. There may be increased toxicity if there is any overlap with the previously irradiated area. As the patient is very symptomatic from the pruritis, I recommend to start chemotherapy as soon as possible to alleviate his symptoms. The patient acknowledges his understanding."

Follow-Up: Chronic Care Clinic, Outside Clinic

Comments: Pt requesting that excisional biopsy be completed prior to starting chemotherapy. D/w pt that I will defer to his CC provider who is more familiar with his care re: ongoing treatment planning. Referral written for hemonc f/u, to be scheduled by referral coordinator.

Electronically Signed by Gayle Juenemann - NP on 10/19/2021 at 5:30 PM

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CHRISTOPHER WORRELL

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Home: 377183

- spoke with Dr. Ali after pt's appointment today
- he recommends referral to ENT for eval for excisional biopsy
- if not able to surgically remove all impacted nodes, may require XRT in addition to chemo
- will determine tx plan once lymph node and skin biopsies are completed

Electronically Signed by Margaret Crenshaw - MD on 06/16/2021 at 2:17 PM

06/12/2021 - Nursing Note

Provider: Christopher Asong - LPN

Location of Care: Correctional Treatment Facility

patient is alert and verbally responsive, received his artificial tears ophth drops.

Electronically Signed by Christopher Asong - LPN on 06/12/2021 at 9:37 PM

06/11/2021 - Nursing Note

Provider: Linda Stephens - RN

Location of Care: Correctional Treatment Facility

Seen by the provider no complaints voiced.

Electronically Signed by Linda Stephens - RN on 06/11/2021 at 2:09 PM

06/11/2021 - Internal Other: Appointment Canceled

Provider: Doctor Unity

Location of Care: DC JAIL MMHS

Appointment status changed to canceled by
Nicole Morrison - PA on 06/11/2021 9:45 AM.

Cancellation Comments

pharmacy contacted and he should receive eye drops today per pharmacy staff

Appointment Information

Appt Type: CTF MD_Sick Call
Date: Friday, June 11, 2021

EXHIBIT "F"

DC JAIL MMHS

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

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Home: 377183

naltrexone as these are not the standard of care. What's more the topical medication is not readily compoundable, was provided by a non-oncologist on an experimental basis for ~30d and simply cannot be brought into the facility d/t real security concerns. Pt was very upset during the entire visit, raising his voice etc. Supportive listening provided-however was clear that an update of pt's condition (which may be worsening as a result of delay in outside care) is important to make informed decision for future care. (from prob list, unclear why it did not transfer over when original note was signed)

Electronically Signed by Marlon Mitchell - MD on 05/05/2021 at 11:39 AM

**05/07/2021 - Append: initial ccc appt
Provider: Margaret Crenshaw - MD
Location of Care: Correctional Treatment Facility**

Patient was seen in conjunction with Dr. Mitchell. I was present for the above discussion and agree with the plan. In summary, Mr. Worrell has a history of two different malignancies--head/neck squamous cell carcinoma and primary cutaneous follicle center lymphoma. The SCC was treated with surgery, XRT, and carboplatin. His lymphoma was treated initially with rituximab. Altho his SCC seems to have remained in remission, he has had multiple recurrences of the follicular B cell lymphoma, most recently in 2019. Because the patient has reported a previous allergic reaction to rituximab, he has been seeking an alternative treatment for this most recent recurrence. In 8/2020 a new oncologist recommended repeat PET and bone marrow bx for re-staging with a plan for an alternative systemic chemo regimen. However, the patient did not do this and instead sought care from an alternative medicine provider who is a board certified urologist but who recommended a compounded topical rapamycin along with naltrexone to manage his recurrent disease. The patient feels that this treatment has been working for him and has requested to continue it here. There are a lot of issues with this request. First, there is some concern that without any recent imaging, the patient may have more advanced disease. Additionally, he has had no recent surveillance for his previously treated SCC. Regarding the topical rapamycin and naltrexone regimen that the patient has requested--even if he has no evidence of extracutaneous disease, this treatment does not appear to be the standard of care. A brief literature review does show that topical treatment options for primary cutaneous b-cell lymphomas do exist, however, topical rapamycin does not seem to have any evidence behind it (1). Understandably, as a rare disease with few cases, robust evidence for different therapies is hard to come by. However, this underscores the need for the patient's care to be managed by an oncologist. He has been referred for an oncology evaluation and he can discuss his treatment options further at that visit .

1. Lang CCV, Ramelyte E, Dummer R. Innovative Therapeutic Approaches in Primary Cutaneous B Cell Lymphoma. *Front Oncol.* 2020;10:1163. Published 2020 Aug 7. doi:10.3389/fonc.2020.01163

Electronically Signed by Margaret Crenshaw - MD on 05/07/2021 at 12:15 PM

**05/04/2021 - TextNote: Temperature Check - Infrared Thermometer
Provider: Alice Atiemo - LPN
Location of Care: Correctional Treatment Facility**

EXHIBIT "G"

DC JAIL MMHS

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

377183

Home: 377183

Electronically Signed by Julia Dorsey - MA on 05/29/2021 at 2:39 PM

05/28/2021 - TextNote: Grievance

Provider: Traci Outlaw

Location of Care: Central Detention Facility

Resident submitted a grievance that he needs to be seen for his hand and to see how it is healing. Resident has been scheduled for several appointments for medical services, provider will follow-up with resident on the progress of his hand and any other test results as required. Grievance resolved

Electronically Signed by Traci Outlaw on 05/28/2021 at 12:04 PM

05/28/2021 - Lab Report: CMP14+eGFR, CBC With Differential/Platelet, Prothrombin Time ...

Provider: Marlon Mitchell - MD

Location of Care: Correctional Treatment Facility

This document contains external references

Patient: CHRISTOPHER WORRELL

ID: 1100 377183

Note: All result statuses are Final unless otherwise noted.

Tests: (1) CMP14+eGFR (334943)

Glucose	94 mg/dL	65-99
BUN	11 mg/dL	6-24
Creatinine	0.83 mg/dL	0.76-1.27
! eGFR If NonAfricn Am	103 mL/min/1.73	>59
! eGFR If Africn Am	119 mL/min/1.73	>59

Labcorp currently reports eGFR in compliance with the current
 recommendations of the National Kidney Foundation. Labcorp will
 update reporting as new guidelines are published from the NKF-ASN
 Task force.

BUN/Creatinine Ratio	13	9-20
Sodium	142 mmol/L	134-144
Potassium	4.3 mmol/L	3.5-5.2
Chloride [H]	107 mmol/L	96-106
Carbon Dioxide, Total		
	21 mmol/L	20-29
Calcium	9.3 mg/dL	8.7-10.2
Protein, Total	6.8 g/dL	6.0-8.5
Albumin	4.6 g/dL	4.0-5.0
Globulin, Total	2.2 g/dL	1.5-4.5

EXHIBIT "H"

DC JAIL MMHS

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

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Home: 377183

Pulse Ox: 98%
Patient has no signs or symptoms related to COVID-19.
Voiced no complaints.

Electronically Signed by Linda Stephens - RN on 04/23/2021 at 11:01 AM

04/22/2021 - TextNote: Temperature Check - Infrared Thermometer
Provider: Myrtha Mathieux - RN
Location of Care: Correctional Treatment Facility

Vital Signs

Height: 75 in.
Temperature: 96.8 degrees F
Respirations: 18
Pulse Rate: 83
Blood Pressure: 107/82 mm Hg
(mm Hg)
Pulse Ox: 96%
Patient denies signs or symptoms related to COVID-19.

Electronically Signed by Myrtha Mathieux - RN on 04/22/2021 at 6:32 PM

04/22/2021 - Internal Other: Appointment Canceled
Provider: Doctor Unity
Location of Care: DC JAIL MMHS

Appointment status changed to canceled by
Anju Menon - MD on 04/22/2021 6:18 PM.

Cancellation Comments

at CTF isolation unit

Appointment Information

Appt Type: Chronic Care_MD
Date: Thursday, April 22, 2021
Time: 7:45 AM for 5 min
Urgency: Routine
Made By: Robin Jenkins - MA
To Visit: CDF CC Menon

DC JAIL MMHS

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

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Home: 377183

Electronically Signed by Doctor Unity on 05/14/2021 at 2:59 PM

05/04/2021 - TextNote: Temperature Check - Infrared Thermometer
Provider: Julia Dorsey - MA
Location of Care: Correctional Treatment Facility

Vital Signs

Height: 75 in.

Temperature: 97.3 degrees F
(mm Hg)

Patient has no signs or symptoms related to COVID-19.

Electronically Signed by Julia Dorsey - MA on 05/04/2021 at 8:20 AM

05/03/2021 - TextNote: Temperature Check - Infrared Thermometer
Provider: Alice Atiemo - LPN
Location of Care: Correctional Treatment Facility

Vital Signs

Height: 75 in.

Temperature: 97.7 degrees F
(mm Hg)

No Covid symptoms

Electronically Signed by Alice Atiemo - LPN on 05/03/2021 at 8:35 PM

05/03/2021 - Internal Other: Appointment No Show
Provider: Doctor Unity
Location of Care: DC JAIL MMHS

Appointment status changed to no show by
Terry Nguyen - DO on 05/03/2021 2:57 PM.

No Show Comments

DC JAIL MMHS

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

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Home: 377183

05/04/2021 - TextNote: Sick Call TextNote
Provider: Nicole Morrison - PA
Location of Care: Correctional Treatment Facility

SC slip reviewed. Pt has a chronic care appt tomorrow

Electronically Signed by Nicole Morrison - PA on 05/04/2021 at 9:44 AM

05/05/2021 - Append: Sick Call TextNote
Provider: Nicole Morrison - PA
Location of Care: Correctional Treatment Facility

SC slip reviewed, pt wanted to check on status of "cancer medication.". Discussed this with the patient last week. Spoke with CC provider who will address with pt at CC appt

Electronically Signed by Nicole Morrison - PA on 05/05/2021 at 3:07 PM

05/04/2021 - Internal Other: Appointment Canceled
Provider: Doctor Unity
Location of Care: DC JAIL MMHS

Appointment status changed to canceled by
Nicole Morrison - PA on 05/04/2021 9:13 AM.

Cancellation Comments

Pt has Chronic Care appt tomorrow.

Appointment Information

Appt Type: CTF MD_Sick Call
Date: Tuesday, May 4, 2021
Time: 8:05 AM for 5 min
Urgency: Routine
Made By: Tamela Clinkscale
To Visit: CTF Sick Call - Blue
Reason: c2a pm

Appt Comments

DC JAIL MMHS

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

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Home: 377183

Electronically Signed by Marlon Mitchell - MD on 05/06/2021 at 11:37 AM

05/06/2021 - Append: awaiting onc f/u

Provider: Marlon Mitchell - MD

Location of Care: Correctional Treatment Facility

-spoke w/ onc re case who affirms that the regimen (incl cream and naltrexone) is very irregular
-oncologist will review case and paperwork, anticipates meeting w/ pt to give full recs
-primary here will review care
-wonder if this pt would benefit from palliative care consultation in future, esp for potential sx management

Electronically Signed by Marlon Mitchell - MD on 05/06/2021 at 11:54 AM

05/06/2021 - Internal Other: Appointment Canceled

Provider: Doctor Unity

Location of Care: DC JAIL MMHS

Appointment status changed to canceled by
Anju Menon - MD on 05/06/2021 11:17 AM.

Cancellation Comments

Patient is at CTF nad has seen CTF provider and f.u is already scheduled.

Appointment Information

Appt Type: Chronic Care_MD
Date: Thursday, May 6, 2021
Time: 7:25 AM for 5 min
Urgency: Routine
Made By: Robin Jenkins - MA
To Visit: CDF CC Menon
Reason: URGENT - MUST BE SEEN!!!!!!! / CTF

Appt Comments

Hx lymphoma cancer, neuropathic pain, and Hypertension
recent COVID

Electronically Signed by Doctor Unity on 05/14/2021 at 3:01 PM

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

377183

Home: 377183

05/15/2021 - Internal Other: Appointment Canceled
Provider: Doctor Unity
Location of Care: DC JAIL MMHS

Appointment status changed to canceled by
Joyce Oppong - NP on 05/15/2021 8:32 PM.

Cancellation Comments

see comments

Appointment Information

Appt Type: CTF MD_Sick Call
Date: Saturday, May 15, 2021
Time: 10:55 AM for 5 min
Urgency: Routine
Made By: Joyce Oppong - NP
To Visit: CTF Sick Call - Purple
Reason: C 2A

Appt Comments

sick call slip reviewed pt requesting for meds refills eye drops

Electronically Signed by Doctor Unity on 05/21/2021 at 1:41 PM

05/15/2021 - TextNote: Sick Call TextNote
Provider: Joyce Oppong - NP
Location of Care: Correctional Treatment Facility

Medications:

CVS DRY EYE RELIEF 0.2-0.2-1 % OPHTHALMIC SOLUTION (GLYCERIN-HYPROMELLOSE-PEG
400) 1-2 gtt in eyes prn #1 x 2

Route:OPHTHALMIC

Entered and Authorized by: Joyce Oppong - NP

Signed by: Joyce Oppong - NP on 05/15/2021

Method used: Printed then faxed to ...
Unity @ DC Dept of Corrections (retail)

Washington, DC 20003 USA

Ph: 202-698-0423

Fax:

Note to Pharmacy: Route: OPHTH;

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

377183

Home: 377183

Location of Care: Correctional Treatment Facility

Vital Signs

Height: 75 in.

Temperature: 97.2 degrees F
(mm Hg)

Patient has no signs or symptoms related to COVID-19.

Electronically Signed by Julia Dorsey - MA on 05/27/2021 at 8:25 AM

05/26/2021 - TextNote: Sick Call TextNote
Provider: Kamilah Ray-Boyd - PA
Location of Care: Correctional Treatment Facility

Pt was seen in CCC today but did not mention left shoulder pain. Will f/u with pt tomorrow in SC.

Electronically Signed by Kamilah Ray-Boyd - PA on 05/26/2021 at 2:15 PM

05/26/2021 - Internal Other: Appointment Canceled
Provider: Doctor Unity
Location of Care: DC JAIL MMHS

Appointment status changed to canceled by
Kamilah Ray-Boyd - PA on 05/26/2021 2:13 PM.

Cancellation Comments

see text note

Appointment Information

Appt Type: CTF MD_Sick Call
Date: Wednesday, May 26, 2021
Time: 8:15 AM for 5 min
Urgency: Routine
Made By: Tamela Clinkscale
To Visit: CTF Sick Call - Blue
Reason: c2a am

Appt Comments

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

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Home: 377183

Rapid COVID-19 PCR test negative.

Electronically Signed by Marlon Mitchell - MD on 06/03/2021 at 2:34 PM

06/03/2021 - TextNote: Rapid Abbott COVID-19 Testing
Provider: Jacqueline Yuille - PA
Location of Care: Correctional Treatment Facility

Pt to have PET CT scan and needs COVID-19 results to be sent to hospital. Rapid Abbott test accepted and performed. Results pending.

Electronically Signed by Jacqueline Yuille - PA on 06/03/2021 at 11:14 AM

06/02/2021 - TextNote
Provider: Joyce Oppong - NP
Location of Care: Correctional Treatment Facility

Pt swabbed by cc provider

Electronically Signed by Joyce Oppong - NP on 06/02/2021 at 12:52 PM

06/02/2021 - Internal Other: Appointment Canceled
Provider: Doctor Unity
Location of Care: DC JAIL MMHS

Appointment status changed to canceled by
Joyce Oppong - NP on 06/02/2021 12:51 PM.

Cancellation Comments

see comments

Appointment Information

Appt Type: CTF MD_Sick Call
Date: Wednesday, June 2, 2021
Time: 10:15 AM for 5 min

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

377183

Home: 377183

Electronically Signed by Kamilah Ray-Boyd - PA on 06/04/2021 at 12:09 PM

06/04/2021 - Internal Other: Appointment Canceled

Provider: Doctor Unity

Location of Care: DC JAIL MMHS

Appointment status changed to canceled by
Kamilah Ray-Boyd - PA on 06/04/2021 12:09 PM.

Cancellation Comments

seen by CC provider

Appointment Information

Appt Type: CTF MD_Sick Call
Date: Friday, June 4, 2021
Time: 8:20 AM for 5 min
Urgency: Routine
Made By: Tamela Clinkscale
To Visit: CTF Sick Call - Blue
Reason: c2a am

Appt Comments

Electronically Signed by Doctor Unity on 06/07/2021 at 5:09 PM

06/04/2021 - Urgent Care: Patient Return PET/CT (with results from CRISP)

Provider: Margaret Crenshaw - MD

Location of Care: Correctional Treatment Facility

Patient Return

Hospital: WHC

Return Type: Outside Imaging/Diagnostic Test

Records Received: No

Comments: PET/CT completed

"results to follow"

Referrals Written: No

DC JAIL MMHS

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

377183

Home: 377183

Provider: Diane Gatling - MA

Location of Care: Correctional Treatment Facility

This document contains external references

Electronically Signed by Diane Gatling - MA on 06/05/2021 at 8:54 AM

06/04/2021 - Internal Other: Appointment No Show

Provider: Doctor Unity

Location of Care: DC JAIL MMHS

Appointment status changed to no show by
Margaret Crenshaw - MD on 06/04/2021 12:10 PM.

No Show Comments

pt seen for patient return visit, CC visit rescheduled

Appointment Information

Appt Type: Chronic Care_MD
Date: Friday, June 4, 2021
Time: 8:40 AM for 5 min
Urgency: Routine
Made By: Margaret Crenshaw - MD
To Visit: CTF CC Crenshaw
Reason: C2A

Appt Comments

[]PET/CT 6/4 ([]BMP, []NPO []diet order (covid to be done at WHC))
[]BM Bx 6/7 ([]NPO@mN [] stop ASA 48h prior []COVID [] CBC , INR
[]wilson 6/10
[]Skin biopsy w HUH derm []onc f/u []port placement

Electronically Signed by Doctor Unity on 06/07/2021 at 5:14 PM

06/04/2021 - TextNote: Sick Call TextNote

Provider: Kamilah Ray-Boyd - PA

Location of Care: Correctional Treatment Facility

Pt is scheduled for CCC visit today. Medical concerns will be addressed at that time.

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

377183

Home: 377183

New Orders: DENTAL [DEN]

Electronically Signed by Joyce Oppong - NP on 06/06/2021 at 4:08 PM

06/05/2021 - TextNote: Sick Call TextNote
Provider: Joyce Oppong - NP
Location of Care: Correctional Treatment Facility

There was no sick call slip on file for 5/31/21.

Electronically Signed by Joyce Oppong - NP on 06/05/2021 at 9:37 AM

06/05/2021 - Internal Other: Appointment Canceled
Provider: Doctor Unity
Location of Care: DC JAIL MMHS

Appointment status changed to canceled by
Joyce Oppong - NP on 06/05/2021 9:37 AM.

Cancellation Comments

see notes

Appointment Information

Appt Type: CTF PA_Sick Call
Date: Monday, May 31, 2021
Time: 8:15 AM for 5 min
Urgency: Routine
Made By: DeBreaka Posey - PA
To Visit: CTF Sick Call - Blue
Reason:

Appt Comments

f/u shoulder xray

Electronically Signed by Doctor Unity on 06/07/2021 at 5:13 PM

06/05/2021 - TextNote: sc

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

377183

Home: 377183

Of note, pt has requested that he not have any outside medical visits scheduled monday, tuesday, and wednesday of next week due to upcoming court/legal dates. Risks of delaying care reviewed w patient. Will review with scheduling coordinator and work to reschedule visits if needed. Risks, benefits, and alternatives to treatment plan discussed.

Follow-up: in 3 weeks.
Problems reviewed today.
Medications reviewed today.
Allergies reviewed today.
Directives reviewed today.

Electronically Signed by Margaret Crenshaw - MD on 07/14/2021 at 12:41 PM

07/07/2021 - TextNote: Grievance
Provider: Traci Outlaw
Location of Care: Central Detention Facility

Resident submitted a grievance that he had been having eye issues for over a month and has some infection build up usually at the end of the day in his eyes. Resident was seen for Ophthalmology appointment on 7/1/2021, medication ordered (eye drops), and eyeglasses were ordered. Grievance resolved

Electronically Signed by Traci Outlaw on 07/07/2021 at 2:33 PM

07/06/2021 - TextNote: refusal of outside medical
Provider: Tamela Clinkscale
Location of Care: DC JAIL MMHS
This document contains external references

Electronically Signed by Tamela Clinkscale on 07/06/2021 at 2:26 PM

07/03/2021 - TextNote: sc

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

377183

Home: 377183

07/15/2021 - Internal Other: Appointment Canceled
Provider: Doctor Unity
Location of Care: DC JAIL MMHS

Appointment status changed to canceled by
Sheila Smith - NP on 07/15/2021 10:53 AM.

Cancellation Comments

SC slip requesting refill of artificial tear drops.

Appointment Information

Appt Type: CTF Nursing
Date: Thursday, July 15, 2021
Time: 8:00 AM for 5 min
Urgency: Routine
Made By: Tamela Clinkscale
To Visit: CTF Sick Call - Blue
Reason: c2b pm

Appt Comments

Electronically Signed by Doctor Unity on 07/16/2021 at 4:00 PM

07/14/2021 - TextNote: sc
Provider: Tamela Clinkscale
Location of Care: DC JAIL MMHS
This document contains external references

Electronically Signed by Tamela Clinkscale on 07/14/2021 at 4:30 PM

07/14/2021 - Chronic Care Clinic: f/u cutaneous lymphoma
Provider: Margaret Crenshaw - MD
Location of Care: Correctional Treatment Facility

Chronic Care

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CHRISTOPHER WORRELL

Male DOB: 06/26/1971

377183

Home: 377183

General health and wellness, including healthy diet and aerobic exercise during recreational time, reviewed with the patient. Health hazards of tobacco, illicit drug use, and excessive alcohol intake discussed and patient advised to quit if using, or not to initiate if not already using.

Assessment/Plan:

FOLLICULAR B CELL LYMPHOMA WITH RECURRENCE - Unchanged. Scheduled for lymph node biopsy on 9/3/2021. Needs to be off of aspirin on 8/30/2021.

SQUAMOUS CELL CARCINOMA OF THE HEAD, NECK AND BASE OF TONGUE, 2007 - Unchanged. Patient has appointment for derm biopsy on 9/7/2021.

Risks, benefits, and alternatives to treatment plan discussed.

Follow-up: in 2 weeks.
Problems reviewed today.
Medications reviewed today.
Allergies reviewed today.
Directives reviewed today.

Electronically Signed by Terry Nguyen - DO on 08/23/2021 at 3:10 PM

08/21/2021 - Internal Other: Appointment Canceled
Provider: Doctor Unity
Location of Care: DC JAIL MMHS

Appointment status changed to canceled by
DeBreakea Posey - PA on 08/21/2021 4:53 PM.

Cancellation Comments

pt request med refill

Appointment Information

Appt Type: CTF MD_Sick Call
Date: Sunday, August 22, 2021
Time: 8:05 AM for 5 min
Urgency: Routine
Made By: Julia Dorsey - MA
To Visit: CTF Sick Call - Purple
Reason: C2B -3

Appt Comments