

Arthur Brown v. City of Chicago, et al. Case No. 18 CV 7064
CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

EVALUATION METHODOLOGY

My evaluation of Mr. Brown consisted of interviewing Mr. Brown and his nephew and sister, Dwayne Henley and Dolores Pace, administering psychological testing to Mr. Brown, and reviewing numerous documents, which are listed in Appendix B.

I interviewed Mr. Brown on seven occasions by Zoom, each lasting more than 90 minutes. Mr. Brown's nephew, Dwayne, helped him navigate the technology. The interview sessions with Mr. Brown occurred on the following dates:

- January 9, 2021,
- January 13, 2021,
- January 15, 2021,
- January 22, 2021,
- January 23, 2021,
- January 25, 2021,
- February 25, 2021.

As part of my evaluation, I administered the Personality Assessment Inventory (PAI) and the Miller Forensic Assessment of Symptoms Test (M-FAST) to Mr. Brown.

I also interviewed Mr. Brown's nephew, Mr. Dwayne Henley (DOB 11/09/1961), by telephone on February 22, 2021, for approximately one hour and Mr. Brown's sister, Ms. Dolores Pace (DOB 7/10/1949) on February 25, 2021, for approximately 40 minutes. At the start of each interview, I informed the interviewee of the purpose and limits of confidentiality of the interview.

SUMMARY OF OPINION

Before his wrongful conviction and over 29 years of imprisonment, Mr. Brown lived a productive and prosperous life. He had a thriving business, was an active father, and an integral and active part of his extended family. His wrongful conviction is similar to kidnapping, as he was forcibly ripped from the life Mr. Brown knew and cherished. During his incarceration, prison officials exploited him as he worked as a skilled tradesman side by side with civilians who were paid a living wage while they paid Mr. Brown less than 3 dollars an hour. Each day of his 10,762 days of incarceration, Mr. Brown experienced multiple traumas, including fearing assaults by officers or other inmates, dehumanizing practices (e.g., shakedowns, not referring to him by his actual name), and witnessing horrific assaults on others. As an innocent person forced to endure these conditions, this experience is akin to trying to survive in a concentration camp or being a civilian prisoner of war. In my clinical opinion, Mr. Brown currently meets the diagnostic criteria for Posttraumatic Stress Disorder (PTSD), and this disorder was the result of his wrongful conviction and nearly 30 years of