

**From:** [ASCC New Claims](#)  
**To:** [Kris Higdon \(DOC\)](#)  
**Cc:** [Kathryn Irby](#); [Mika Tucker](#); [Yolanda Charles \(DOC\)](#)  
**Subject:** CLAIM: Lawrence E. Martin v. ADC, Claim No. 250817  
**Date:** Thursday, February 6, 2025 1:50:00 PM  
**Attachments:** [Lawrence E. Martin v. ADC agency ltr .pdf](#)  
[Lawrence E. Martin Claim form, supporting docs, def ltr, and claim update \(combined\) - 250817.pdf](#)

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Dear Mr. Higdon,

Please confirm receipt of the attached claim file. The agency may file its response to this claim electronically by sending it to [ascpleadings@arkansas.gov](mailto:ascpleadings@arkansas.gov), with a copy to the claimant pursuant to the Arkansas Rules of Civil Procedure.

Please contact Mika Tucker with any questions.

Thank you,  
Caitlin

**Caitlin McDaniel**  
*Administrative Specialist II*  
**Arkansas State Claims Commission**  
101 East Capitol Avenue, Suite 410  
Little Rock, Arkansas 72201  
(501) 682-1619

February 6, 2025

Mr. Kris Higdon  
Arkansas Division of Correction  
1302 Pike Avenue, Suite C  
North Little Rock, Arkansas 72114

(via email)

RE: *Lawrence E. Martin v. Arkansas Division of Correction*  
**Claim No. 250817**

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Dear Mr. Higdon,

Enclosed please find a copy of the above-styled claim filed against the Arkansas Division of Correction. Pursuant to the Arkansas Rules of Civil Procedure, as well as Claims Commission Rule 2.2, you have **thirty days from the date of service** in which to file a responsive pleading.

Your responsive pleading should include your agency number, fund code, appropriation code, and activity/section/unit/element that this claim should be charged against, if liability is admitted, or if the Claims Commission approves this claim for payment. This information is necessary even if your agency denies liability.

Sincerely,

Mika Tucker

ES: cmcdaniel

cc: Lawrence E. Martin (ADC [REDACTED]), *Claimant* (w/ encl.)

Arkansas State Claims Commission

Please print in ink or type

NOV 21 2024

RECEIVED

BEFORE THE STATE CLAIMS COMMISSION Of the State of Arkansas

- Mr Mrs Ms Miss

Lawrence E. Martin (ADC [redacted]), Claimant

vs State of Arkansas, Respondent

Do Not Write in These Spaces Claim No. Date Filed Amount of Claim \$ Fund

COMPLAINT

Lawrence E. Martin (ADC [redacted]), the above named Claimant, of [redacted] (Name) (Street or R.F.D. & No.) (City)

County of [redacted] represented by [redacted] (State) (Zip Code) (Daytime Phone No.) (Legal Counsel, if any, for Claim)

of [redacted] (Street and No.) (City) (State) (Zip Code) (Phone No.) (Fax No.) says:

State agency involved: [redacted] Amount sought: [redacted]

Month, day, year and place of incident or service: THE STATE, AS A JAILER, HAD A DUTY TO EXERCISE REASONABLE CARE FOR THE PROTECTION OF MARTIN'S LIFE AND HEALTH FROM DEPUTY WARDEN, MICHAEL RICHARDSON, MAJOR, T. ALLISON WHO ON OR AROUND DECEMBER 2022, TELLING MR. MARTIN: RESTRICTIVE HOUSEING 2 YEARS AT MAX CLASSIFICATION AND TELLING MARTIN DONT WORRY ABOUT YOUR TESTS GOING TO RED WOOD LAB TOXICOLOGY'S - NO OPPERTUNITY FOR REBUTTAL. SEE WATKINSON V. DEPARTMENT OF DEPARTMENT OF CORRECTIONS. MARTIN IS SEEKING \$16,000 EACH FROM BOTH EMPLOYEES FOR THE REASONS ABOVE, AND ATYPICAL AND SIGNIFICANT HARDSHIP, KNOWING AD 13-17 DRUG TESTING POLICY FOR INMATES AND EMPLOYEES WAS VIOLATED THAT WAS IN PLACE IN 2022.

CLAIM STATED PRISON OFFICIALS ABOVE RETALIATED AGAINST HIM FOR EXERCISING 1ST AMENDMENT RIGHT TO PETITION FOR REDRESS OF GRIEVANCES / LAW SUITS. SEE SIMPSON V. NICKEL, 450 F. 3d 303; AND 1ST AMENDMENT RETALIATION CLAIM STATED: WHERE CAPTAIN T. MUNN ISSUED FALSE REPORT'S, AND RICHARDSON / ALLISON UNDER COLOR OF LAW SENTENCED MARTIN TO TORTURE AND HARASS ILLEGAL INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS. AS A RESULT MARTIN HAS PTSD.

As parts of this complaint, the claimant makes the statements, and answers the following questions, as indicated: (1) Has claim been presented to any state department or officer thereof? when? to whom? (Department)

and that \$ was paid thereon: (2) Has any third person or corporation an interest in this claim? if so, state name and address (Name) (Street or R.F.D. & No.) (City) (State) (Zip Code)

and that the nature thereof is as follows: and was acquired on in the following manner:

THE UNDERSIGNED states on oath that he or she is familiar with the matters and things set forth in the above complaint, and that he or she verily believes that they are true.

LAWRENCE MARTIN (Print Claimant/Representative Name) Lawrence E. Martin (Signature of Claimant/Representative)

SWORN TO and subscribed before me at Brickley (City) (State)

(SEAL) on this 22 day of September 2024 (Date) (Month) (Year)



Paul Harris (Notary Public) My Commission Expires: 12-15-2026 (Month) (Day) (Year)

UNIT LEVEL GRIEVANCE FORM (Attachment I)

Unit/Center [REDACTED]

Name LAWRENCE MARTIN

ADC# [REDACTED] Brks # MAX 4-10 Job Assignment \_\_\_\_\_

FOR OFFICE USE ONLY	
GRV. #	<u>23-02050</u>
Date Received:	<u>11-27-23</u>
GRV. Code #:	<u>305</u>

11/26/23 (Date) STEP ONE: Informal Resolution

11/26/23 (Date) STEP TWO: Formal Grievance (All complaints/concerns should first be handled informally.)  
If the issue was not resolved during Step One, state why: THESE OFFICIALS BELOW RETALIATED, AND MUNN PUT A HIT ON MY LIFE.

\_\_\_\_\_, (Date) EMERGENCY GRIEVANCE (An emergency situation is one in which you may be subject to a substantial risk of physical harm; emergency grievances are not for ordinary problems that are not of serious nature). If you marked yes, give this completed form to the designated problem-solving staff, who will sign the attached emergency receipt. In an Emergency, state why: \_\_\_\_\_

Is this Grievance concerning Medical or Mental Health Services? NO If yes, circle one: medical or mental

BRIEFLY state your one complaint/concern and be specific as to the complaint, date, place, name of personnel involved and how you were affected. (Please Print): MARTIN IS SEEKING 20 MILLION IN DAMAGE AWARD FEDERAL COURT HAS ACKNOWLEDGED PRISON OFFICIAL T. MUNN-WILLIAMS FABRICATED WORK RECORD / WRITTEN STATEMENTS / MARTIN'S INFORMATION, THAT SHE'S NOT A LICENSED TOXICOLOGIST. THE COURTS OWN ADMISSIBLE DOCKET ENTRIES ATTORNEY GENERAL STATED: GET THE RIGHT ONE WHO DID THIS TO HIM, RE: 4:22-CV-01271 KGB LAWRENCE EDWARD MARTIN V. DEXTER PAYNE. POLICY IN PLACE 2022 AD 13-17, ALL TEST MUST GO TO RED WOOD LAB TOXICOLOGIES LIKE INMATE CHARLES GOODWIN TEST TO CONFIRM UNITS OWN TEST. WHEN SEASONED EMPLOYEE MAJOR T. ALLISON / POLICE OFFICER, TOLD ME, DONT WORRY ABOUT YOUR TEST GOING TO THE LAB, AND DEPUTY WARDEN RICHARDSON SAID: WHAT DO YOU WANT TO DO WITH HIM? CLASSIFICATION, 2 YEARS RESTRICTIVE HOUSING. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.

Lawrence Martin  
Inmate Signature

11/26/2023  
Date

If you are harmed, threatened because of your use of the grievance process, report it immediately to the Warden or designee.

**THIS SECTION TO BE FILLED OUT BY STAFF ONLY**

This form was received on 11/26/23 (date), and determined to be Step One and/or an Emergency Grievance (Yes or No). This form was forwarded to medical or mental health? \_\_\_\_\_ (Yes or No). If yes, name of the person in that department receiving this form: \_\_\_\_\_ Date \_\_\_\_\_

Sgt A Willen [REDACTED] Sgt A Willen  
PRINT STAFF NAME (PROBLEM SOLVER) Staff Signature Date Received

Describe action taken to resolve complaint, including dates: RECEIVED not a grievable matter

DEC 22 2023

Sgt A Willen 11/26/23  
Staff Signature & Date Returned

[Signature]  
INMATE GRIEVANCE SUPERVISOR  
ADMINISTRATIVE SERVICES  
Inmate Signature & Date Received 11/26/23

This form was received on 11/26/20 (date), pursuant to Step Two. Is it an Emergency? \_\_\_\_\_ (Yes or No).

Staff Who Received Step Two Grievance: Sgt A Willen Date: 11/26/23

Action Taken: \_\_\_\_\_ (Forwarded to Grievance Officer/Warden/Other) Date: \_\_\_\_\_

If forwarded, provide name of person receiving this form: \_\_\_\_\_ Date: \_\_\_\_\_

DISTRIBUTION: YELLOW & PINK - Inmate Receipts; BLUE - Grievance Officer; ORIGINAL - Given back to Inmate after Completion of Step One and Step Two.

WARDEN'S/CENTER SUPERVISOR'S DECISION

INMATE NAME: Martin, Lawrence E.

ADC #: [REDACTED]

GRIEVANCE #: 123-02050

WARDEN/CENTER SUPERVISOR'S DECISION:

Inmate Martin, you stated in your grievance that, " Martin is seeking 20 million in damage award Federal court has acknowledged prison official T. Munn-Williams fabricated work record/written statements/Martin's information, that she's not a licensed toxicologist. The courts own admissible docket entries Attorney General stated: Get the right one who did this to him, RE: 4:22-CV-01271 KGB Lawrence Edward Martin V. Dexter Payne. Policy in Place 2022 AD13-17, all test must go to Redwood Lab Toxicology like inmate Charles Goodwin test to confirm units own test. When seasoned employee Major T. Allison/Police Officer, told me, don't worry about your test going to the lab, and Deputy Warden Richardson said: What do you want to do with him @ classification, 2 years Restrictive Housing. Intentional infliction of emotional distress."

Captain Williams denies your allegations of fabricating documentation. She stated that you were present when your drug test was being conducted. Deputy Warden Richardson stated that you were given a release plan to remain disciplinary free for two (2) months to be considered for release to general population. However, you have not provided any evidence to support your claims in your grievance above. Therefore, your grievance is without merit.

SIGNATURE OF WARDEN/SUPERVISOR OR DESIGNEE

Moses Jackson, TO

12/16/23  
Date

Supt  
Title

RECEIVED  
DEC 22 2023

INMATE'S APPEAL

If you are not satisfied with this response, you may appeal this decision within five working days by filling in the information requested below and mailing it to the appropriate Chief Deputy/Deputy/Assistant Director along with the Unit Level Grievance Form. Keep in mind that you are appealing the decision to the original grievance. Do not list additional issues, which are not part of your original grievance as they will not be addressed. Your appeal statement is limited to what you write in the space provided below.

WHY DO YOU DISAGREE WITH THE ABOVE RESPONSE? THE FEDERAL COURT STATED IN MARTIN V. PAYNE, [REDACTED] 4:22-CV-1271 KGB THAT CAPTAIN T. M. WILLIAMS DOES NOT HAVE A TOXICOLOGIST LICENSE! THUS, BY NOT SENDING MY TESTS TO LAB [REDACTED] [RED WOOD LAB TOXICOLOGIES] TO CONFIRM [REDACTED] UNIT TESTS YOU COMMIT PERJURY AND FILED FALSE REPORTS, FELONY'S! PLUS, CAPTAIN T. MUNN PUT A HIT OUT ON ME I'VE HEARD INMATES SAY THEY WANT IT, RICHARDSON IS THE ENEMY, HIM AND MAJOR ALLISON SENTENCING ME TO 2 YEARS RESTRICTIVE HOUSING, FURTHER ALLISON, MAJOR STATED DONT WORRY ABOUT YOUR TESTS GOING TO LAB THIS IS THE MAJOR / POLICE OFFICER -- CK SENDINE YOUR TEST TO LAB, AND NOW TRYING

Jawunx Mart  
12/16/23

I STATED A RELEASE PLAN TO LET ME BE MURDERED BY INMATES CAPTAIN MUNN HIRED TO KILL ME IN POPULATION. STAND YOUR GROUND LAW IN EFFECT, STAFF IS PLAYING WITH MY LIFE. YOU BETTER DO THE RIGHT THING'S, IM NOT GOING.

### DEPUTY/ASSISTANT DIRECTOR'S DECISION

INMATE NAME: Martin, Lawrence E.      ADC #: [REDACTED]      GRIEVANCE#: [REDACTED] 123-02050

**CHIEF DEPUTY/DEPUTY/ASSISTANT DIRECTOR'S DECISION:**

On 11/26/2023, you stated the following complaint: Martin is seeking 20 million in damage award Federal court has acknowledged prison official T. Munn-Williams fabricated work record/written statements/Martin's information, that she's not a licensed toxicologist. The courts own admissible docket entries Attorney General stated: Get the right one who did this to him, RE: 4:22-CV-01271 KGB Lawrence Edward Martin V. Dexter Payne. Policy in Place 2022 AD13-17, all test must go to Redwood Lab Toxicology like inmate Charles Goodwin test to confirm units own test. When seasoned employee Major T. Allison/Police Officer, told me, don't worry about your test going to the lab, and Deputy Warden Richardson said: What do you want to do with him @ classification, 2 years Restrictive Housing. Intentional infliction of emotional distress.

The Warden responded to your appeal on 12/16/2023, by stating the following: Captain Williams denies your allegations of fabricating documentation. She stated that you were present when your drug test was being conducted. Deputy Warden Richardson stated that you were given a release plan to remain disciplinary free for two (2) months to be considered for release to general population. However, you have not provided any evidence to support your claims in your grievance above. Therefore, your grievance is without merit.

Your appeal was received on 12/22/2023. After reviewing your appeal and supporting documentation, I find staff deny your allegations. You have failed to provide any evidence to substantiate your allegations. Without further evidence, I must find your appeal without merit.

Appeal denied

DIRECTOR

Please be advised that if you appeal this decision to the U.S. District Court, a copy of this Chief Deputy/Deputy/Assistant Director's Decision must be attached to any petition or complaint or the Court may dismiss your case without notice. You may also be subject to paying filing fees pursuant to the Prison Litigation Act of 1995.

**ARKANSAS STATE CLAIMS COMMISSION**

(501)682-1619  
FAX (501)682-2823



KATHRYN IRBY  
DIRECTOR

101 EAST CAPITOL AVENUE  
SUITE 410  
LITTLE ROCK, AR 72201-3823

December 17, 2024

Lawrence E. Martin (ADC [REDACTED])  
[REDACTED]

RE: **Claim No. 250817 – deficient filing**

---

Dear Mr. Martin,

The Claims Commission is in receipt of your claim documents. However, you do not state which state agency or department you believe to be responsible for your damages. Additionally, our office notes that you did not provide the amount sought on your claim form.

If your claim is against a state agency or department, please write that agency or department name on the line of your enclosed claim form that reads "State agency involved," provide the amount sought, and return the completed form to our office. If your claim is not against a state agency or department, you will need to file your claim elsewhere.

Sincerely,

Mika Tucker

ES: cmcdaniel

Enclosures (claim form file-marked 11/21/2024)



Arkansas State Claims Commission

NOV 21 2024

RECEIVED

Please print in ink or type

BEFORE THE STATE CLAIMS COMMISSION Of the State of Arkansas

- Mr. Mrs. Ms. Miss

Lawrence E. Martin (ADC [redacted]) Claimant

vs.

State of Arkansas, Respondent

Do Not Write in These Spaces. Claim No., Date Filed (Month, Day, Year), Amount of Claim \$, Fund.

COMPLAINT

Lawrence E. Martin (ADC [redacted]), the above named Claimant

(State) (Zip Code) (Daytime Phone No.) County of represented by (City) (Legal Counsel, if any, for Claim) says:

State agency involved: Amount sought:

Month, day, year and place of incident or service: THE STATE, AS A JAILER, HAD A DUTY TO EXERCISE

Explanation: REASONABLE CARE FOR THE PROTECTION OF MARTIN'S LIFE AND HEALTH FROM DEPUTY WARDEN, MICHAEL RICHARDSON; MAJOR, T. ALLISON WHO ON OR AROUND DECEMBER 2022, TELLING MR. MARTIN; RESTRICTIVE HOUSEING 2 YEARS AT MAX CLASSIFICATION AND TELLING MARTIN DONT WORRY ABOUT YOUR TESTS GOING TO RED WOOD LAB TOXICOLOGY'S - NO OPPERTUNITY FOR REBUTTAL. SEE WATKINSON V. DEPARTMENT OF DEPARTMENT OF CORRECTIONS. MARTIN IS SEEKING \$ 16,000 EACH FROM BOTH EMPLOYEES FOR THE REASONS ABOVE, AND ATYPICAL AND SIGNIFICANT HARDSHIP, KNOWING AD 13-17 DRUG TESTING POLICY FOR INMATES AND EMPLOYEES WAS VIOLATED THAT WAS IN PLACE IN 2022.

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As parts of this complaint, the claimant makes the statements, and answers the following questions, as indicated: (1) Has claim been presented to any state department or officer thereof? when? to whom? and that the following action was taken thereon:

and that \$ was paid thereon: (2) Has any third person or corporation an interest in this claim? if so, state name and address

and that the nature thereof is as follows: and was acquired on, in the following manner:

THE UNDERSIGNED states on oath that he or she is familiar with the matters and things set forth in the above complaint, and that he or she verify believes that they are true.

LAWRENCE MARTIN

(Print Claimant/Representative Name)

[Handwritten signature]

COVER LETTER

DEC 23 2024

RECEIVED

DEAR CLAIMS COMMISSION,

12/19/24

ON THE ABOVE DATE @ 9:10

PM CAPTAIN PAUL HARRIS CALLED MARTIN TD LEGAL MAIL  
CALL, HE COPIED THE ENCLOSED STATE CLAIMS COMMISSION  
DOCUMENTS, ILLEGALLY SHREDDED ALL ORIGINAL STATE CLAIM  
COMMISSION DOCUMENTS SAID: THIS IS HOW ALL INCOM-  
ING MAIL IS NOW DONE. WHICH IS ILLEGAL AND MARTIN  
HAD NO CONTROL NOR POWER OVER HOW THE MATTER  
WAS HANDLED. THE STATE CLAIM COMMISSION NEEDED  
THE DESTROYED DOCUMENTS RETURNED TO THEM. THE  
ORIGINAL DOCUMENTS WERE DESTROYED BY CAPTAIN PAUL  
HARRIS ON 12/19/2024 @ 9:10 PM.

SINCERELY

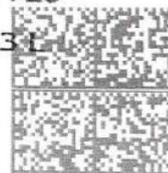
James Martin # [REDACTED]  
[REDACTED]  
[REDACTED]

CONTACT DEPUTY WARDEN BRANDON DAVIS, WARDEN  
OF OPERATIONS.



LITTLE ROCK AR 720

17 DEC 2024 PM 3:14



quadiant

FIRST-CLASS MAIL  
IMI

\$000.69<sup>0</sup>

12/17/2024 ZIP 72201  
043M31225072

US POSTAGE

STATE CLAIMS COMMISSION  
PITOL AVE., SUITE 410  
LITTLE ROCK, ARKANSAS 72201-3823

12/27

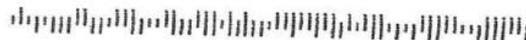
DEC 18 2024

FARU

Lawrence E. Martin (ADJ) [REDACTED]



72360-097070



**ARKANSAS STATE CLAIMS COMMISSION**

(501)682-1619  
FAX (501)682-2823



KATHRYN IRBY  
DIRECTOR

101 EAST CAPITOL AVENUE  
SUITE 410  
LITTLE ROCK, AR 72201-3823

December 17, 2024

Lawrence E. Martin (ADC [REDACTED])  
[REDACTED]

RE: **Claim No. 250817 – deficient filing**

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Dear Mr. Martin,

The Claims Commission is in receipt of your claim documents. However, you do not state which state agency or department you believe to be responsible for your damages. Additionally, our office notes that you did not provide the amount sought on your claim form.

If your claim is against a state agency or department, please write that agency or department name on the line of your enclosed claim form that reads "State agency involved," provide the amount sought, and return the completed form to our office. If your claim is not against a state agency or department, you will need to file your claim elsewhere.

Sincerely,

Mika Tucker

ES: cmcdaniel

Enclosures (claim form file-marked 11/21/2024)

Arkansas State Claims Commission

NOV 21 2024

RECEIVED

Please print in ink or type

BEFORE THE STATE CLAIMS COMMISSION Of the State of Arkansas

- Mr Mrs Ms Miss

Lawrence E. Martin (ADC [redacted]), Claimant

vs.

State of Arkansas, Respondent

Do Not Write in These Spaces Claim No. Date Filed DEC 23 2024 Amount of Claim \$ Fund

COMPLAINT

Lawrence E. Martin (AD [redacted]), the above named Claimant, of [redacted] (City)

(State) (Zip Code) (Daytime Phone No.) County of represented by (Legal Counsel, if any, for Claim)

of (Street and No.) (City) (State) (Zip Code) (Phone No.) (Fax No.) says

State agency involved: ARKANSAS DEPT. OF CORRECTION Amount sought: 32,000.00

Month, day, year and place of incident or service: THE STATE, AS A JAILER, HAD A DUTY TO EXERCISE REASONABLE CARE FOR THE PROTECTION OF MARTIN'S LIFE AND HEALTH FROM DEPUTY WARDEN, MICHAEL RICHARDSON, MAJOR, T. ALLISON WHO ON OR AROUND DECEMBER 2022, TELLING MR. MARTIN: RESTRICTIVE HOUSEING 2 YEARS AT MAX CLASSIFICATION AND TELLING MARTIN DONT WORRY ABOUT YOUR TESTS GOING TO RED WOOD LAB TOXICOLOGY'S - NO OPPERTUNITY FOR REBUTTAL. SEE WATKINSON V. DEPARTMENT OF DEPARTMENT OF CORRECTIONS. MARTIN IS SEEKING \$16,000 EACH FROM BOTH EMPLOYEES FOR THE REASONS ABOVE, AND ATYPICAL AND SIGNIFICANT HARDSHIP, KNOWING AD 13-17 DRUG TESTING POLICY FOR INMATES AND EMPLOYEES WAS VIOLATED THAT WAS IN PLACE IN 2022.

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and that \$ was paid thereon: (2) Has any third person or corporation an interest in this claim? if so, state name and address

(Name) (Street or R.F.D. & No.) (City) (State) (Zip Code) and that the nature thereof is as follows:

and was acquired on in the following manner

THE UNDERSIGNED state or oath that he or she is familiar with the matters and claims in this claim...

COMPLAINT

Lawrence E. Martin (ADC [redacted]), the above named Claimant, of [redacted] (City)

(State) (Zip Code) (Daytime Phone No.) County of \_\_\_\_\_ represented by \_\_\_\_\_ (Legal Counsel, if any, for Claim)

of \_\_\_\_\_ (Street and No.) (City) (State) (Zip Code) (Phone No.) (Fax No.) say

State agency involved: \_\_\_\_\_ Amount sought: \_\_\_\_\_

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and that the nature thereof is as follows: \_\_\_\_\_; and was acquired on \_\_\_\_\_, in the following manner

THE UNDERSIGNED states on oath that he or she is familiar with the matters and things set forth in the above complaint, and that he or she verily believe that they are true.

LAWRENCE MARTIN (Print Claimant/Representative Name)

[Signature] (Signature of Claimant/Representative)

SWORN TO and subscribed before me at Brickeys (City) (State)

(SEAL) on this 22 day of September, 2024 (Date) (Month) (Year)



[Signature] (Notary Public) My Commission Expires: 12-15-2026 (Month) (Day) (Year)

**From:** [Kris Higdon \(DOC\)](#)  
**To:** [ASCC New Claims](#)  
**Cc:** [Kathryn Irby](#); [Mika Tucker](#); [Yolanda Charles \(DOC\)](#)  
**Subject:** RE: CLAIM: Lawrence E. Martin v. ADC, Claim No. 250817  
**Date:** Thursday, February 6, 2025 1:51:22 PM

---

Received.

Kris Alan Higdon (Mr.)  
Deputy General Counsel  
1302 Pike Ave., Suite C  
North Little Rock, AR 72114  
Cell: (870) 643-1364  
[Kris.a.higdon@doc.arkansas.gov](mailto:Kris.a.higdon@doc.arkansas.gov)

---

**From:** ASCC New Claims <[ASCC.New.Claims@arkansas.gov](mailto:ASCC.New.Claims@arkansas.gov)>  
**Sent:** Thursday, February 6, 2025 1:50 PM  
**To:** Kris Higdon (DOC) <[Kris.A.Higdon@doc.arkansas.gov](mailto:Kris.A.Higdon@doc.arkansas.gov)>  
**Cc:** Kathryn Irby <[Kathryn.Irby@arkansas.gov](mailto:Kathryn.Irby@arkansas.gov)>; Mika Tucker <[Mika.Tucker@arkansas.gov](mailto:Mika.Tucker@arkansas.gov)>; Yolanda Charles (DOC) <[Yolanda.Charles@doc.arkansas.gov](mailto:Yolanda.Charles@doc.arkansas.gov)>  
**Subject:** CLAIM: Lawrence E. Martin v. ADC, Claim No. 250817

Dear Mr. Higdon,

Please confirm receipt of the attached claim file. The agency may file its response to this claim electronically by sending it to [ascpcleadings@arkansas.gov](mailto:ascpcleadings@arkansas.gov), with a copy to the claimant pursuant to the Arkansas Rules of Civil Procedure.

Please contact Mika Tucker with any questions.

Thank you,  
Caitlin

**Caitlin McDaniel**  
*Administrative Specialist II*  
**Arkansas State Claims Commission**  
101 East Capitol Avenue, Suite 410  
Little Rock, Arkansas 72201  
(501) 682-1619

**From:** [Kris Higdon \(DOC\)](#)  
**To:** [ASCC Pleadings](#)  
**Cc:** [Tawnie Rowell \(DOC\)](#)  
**Subject:** Lawrence Mart v. ADC, 250817  
**Date:** Wednesday, February 26, 2025 7:46:44 AM  
**Attachments:** [Rule 12\(b\)-MTD.pdf](#)

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Please see attached motion to dismiss.

Kris Alan Higdon (Mr.)  
Deputy General Counsel  
1302 Pike Ave., Suite C  
North Little Rock, AR 72114  
Cell: (870) 643-1364  
[Kris.a.higdon@doc.arkansas.gov](mailto:Kris.a.higdon@doc.arkansas.gov)

## BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

LAWRENCE MARTIN [REDACTED]

CLAIMANT

v

NO. 250817

ARKANSAS DEPARTMENT OF CORRECTIONS  
DIVISION OF CORRECTION

RESPONDENT

RULE 12(b)(6) MOTION TO DISMISS

Comes Now the Respondent, Arkansas Department of Corrections (ADC), for its Motion to Dismiss, states:

1. The inmate's claim should be dismissed pursuant to the Arkansas Rules of Civil Procedure (ARCP) 12(b)(6) as it fails to state facts upon which relief can be granted.

2. On a motion to dismiss pursuant to Rule 12(b)(6) of the Arkansas Rules of Civil Procedure the courts treat the facts alleged in complaints as true and view them in the light most favorable to the plaintiff. Dockery v Morgan, 2011 Ark. 94.

3. "However, [Arkansas's] rules require fact pleading, and a complaint must state facts, not mere conclusions, in order to entitle the pleader to relief." *Id.* The Court should "treat only the facts alleged in the complaint as true but not the plaintiff's theories, speculation, or statutory interpretation." *Id.*

4. An "important mechanism for weeding out meritless claims [is a] motion to dismiss for failure to state a claim." Fifth Third Bancorp v. Dudenhoeffer, 573 U.S. 409, 425 (2014).

5. Legal conclusions, unsupported conclusions, and unwarranted inferences must be ignored and fail to withstand a Rule 12(b)(6) motion. *See Farm Credit Svcs. v American State Bank*, 339 F.3d 764 (8<sup>th</sup> Cir. 2003).

6. A pleading must contain a “short and plain statement of the claim showing that the pleader is entitled to relief. *Ashcraft v Iqbal*, 556 U.S. 662 (2009).

7. Although detailed factual allegations are not required, more than “unadorned, the-defendant-unlawfully-harmed-me-accusations” are required. *Id.*

8. To survive a motion to dismiss, a complaint must contain sufficient factual matter that, when accepted as true, state a claim to relief that is plausible on its face. *Id.*

9. A claim is facially plausible “when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged.” *Id.*

10. Pro Se parties are not given special treatment and are held to the same standard as a licensed attorney. *Pressler v. Ark. Publ. Serv. Comm’n*, 2011 Ark. App. 512, at 9, 385 S.W.3d 349, 355 (citing *Elder v. Mark Ford & Assocs.*, 103 Ark. App. 302, 288 S.W.3d 702 (2008)).

11. Whether a plaintiff is represented by counsel or is appearing *pro se*, his complaint must allege specific facts sufficient to state a claim. *See Martin v Sargent*, 780 F.2d 1334, 1337 (8<sup>th</sup> Cir. 1985).

12. A complaint must state facts, not mere conclusions, in order to satisfy the requirements of Rule 8 of the Arkansas Rules of Civil Procedure. *Doe v Weiss*, 2010 Ark. 150.

13. Because the doctrine of sovereign immunity does not bar plaintiff from litigating his 42 U.S.C. § 1983 claim against defendant individually in state or federal courts of general

jurisdiction, the Arkansas Claims Commission has no jurisdiction over the constitutional claim.

Smith v. Johnson, 779 F.3d 867 (8th Cir. 2015).

14. Claimant clearly and unambiguously makes claims of violations of his constitutional rights.

15. Claimant makes no other claims for any other cause of action in his petition.

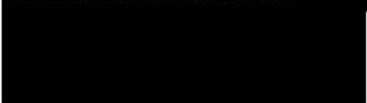
WHEREFORE, Respondent prays that the motion be granted, the complaint dismissed, and all other just and proper relief to which it may be entitled.

Respectfully submitted,

/s/ Kris Alan Higdon  
 Kris Alan Higdon #2004115  
 Deputy General Counsel  
 Arkansas Department of Corrections  
 1302 Pike Ave., Suite C  
 North Little Rock, AR 72114  
 Telephone: (501) 682-9593  
 Kris.a.higdon@doc.arkansas.gov

CERTIFICATE OF SERVICE

I, Kris Alan Higdon, hereby certify that a true and correct copy of the foregoing has been served upon persons set out below, on this 26<sup>th</sup> day of February 2025.

LAWRENCE MARTIN   


/s/ Kris Alan Higdon  
 Kris Alan Higdon

**From:** [Misty Scott](#) on behalf of [ASCC Pleadings](#)  
**To:** [Tawnie Rowell \(DOC\)](#); [Miles S. Morgan](#); [Trent Rigdon \(DOC\)](#); [Taylor Reavis \(DOC\)](#)  
**Cc:** [Yolanda Charles \(DOC\)](#); [ASCC Pleadings](#); [Mika Tucker](#)  
**Subject:** ORDER: Lawrence Martin v. ADC, Claim No. 250817  
**Date:** Monday, July 21, 2025 10:28:35 AM  
**Attachments:** [Lawrence Martin v. ADC .pdf](#)  
[Lawrence Martin-order2.pdf](#)

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Dear Counselors:

Please see attached. Contact Mika Tucker with any questions.

Thank you,

*Misty*

**Misty Scott**  
**Arkansas State Claims Commission**

**ARKANSAS STATE CLAIMS COMMISSION**

(501) 682-1619  
FAX (501) 682-2823



KATHRYN IRBY  
DIRECTOR

101 EAST CAPITOL AVENUE  
SUITE 410  
LITTLE ROCK, ARKANSAS  
72201-3823

July 21, 2025

Mr. Lawrence Martin (ADC [REDACTED])  
[REDACTED]

Ms. Tawnie Rowell  
Mr. Miles Morgan  
Mr. Trent Rigdon  
Ms. Taylor Reavis  
Arkansas Division of Correction  
1302 Pike Avenue, Suite C  
North Little Rock, Arkansas 72114

(via email)

Re: ***Lawrence Martin v. Arkansas Division of Correction***  
Claim No. 250817

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Dear Mr. Martin, Ms. Rowell, Mr. Morgan, Mr. Rigdon, and Ms. Reavis:

Enclosed please find an Order entered on July 18, 2025, by the Arkansas State Claims Commission. If you have any questions, please do not hesitate to contact my office.

Sincerely,

Mika Tucker

ES: msscott

## BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

LAWRENCE MARTIN (ADC [REDACTED])

CLAIMANT

V.

CLAIM NO. 250817

ARKANSAS DIVISION OF  
CORRECTION

RESPONDENT

ORDER

Now before the Arkansas State Claims Commission (the “Commission”) is a motion filed by the Arkansas Division of Correction (the “Respondent”) to dismiss the claim of Lawrence Martin (the “Claimant”). Based upon a review of the motion, the arguments made therein, and the law of Arkansas, the Commission hereby finds as follows:

1. Claimant filed his claim on December 23, 2024, seeking \$32,000.00 in damages related to his allegations that Respondent’s employees denied him “an opportunity for rebuttal” regarding drug testing. Claimant mentions issues of retaliation, classification and his First Amendment Rights.

2. Respondent filed a motion to dismiss, arguing, *inter alia*, that Claimant is making constitutional claims, and the Commission does not have jurisdiction.

3. Claimant did not respond to the motion.

4. The Commission agrees with Respondent that Claimant’s claim is premised upon alleged constitutional violations. Because such claims can be brought a court of general jurisdiction, the Commission does not have jurisdiction to hear them. *See* Ark. Code Ann. § 19-10-204.

5. If Claimant believes that he has federal law claims against individual employees or claims of constitutional violations, those claims can be brought in a court of general jurisdiction.

*See* Ark. Code Ann. § 19-10-204.

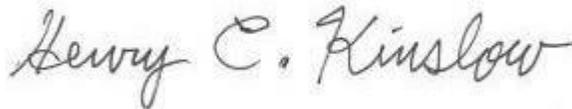
6. Respondent's motion is GRANTED pursuant to Ark. R. Civ. Proc. 12(b), and Claimant's claim is DISMISSED.

IT IS SO ORDERED.




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ARKANSAS STATE CLAIMS COMMISSION  
Dee Holcomb




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ARKANSAS STATE CLAIMS COMMISSION  
Henry Kinslow, Chair




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ARKANSAS STATE CLAIMS COMMISSION  
Sylvester Smith

DATE: July 18, 2025

**Notice(s) which may apply to your claim**

- (1) A party has forty (40) days from transmission of this Order to file a Motion for Reconsideration or a Notice of Appeal with the Claims Commission. Ark. Code Ann. § 19-10-211(a)(1). If a Motion for Reconsideration is denied, that party then has twenty (20) days from the transmission of the denial of the Motion for Reconsideration to file a Notice of Appeal with the Claims Commission. Ark. Code Ann. § 19-10-211(a)(1)(B)(ii). A decision of the Claims Commission may only be appealed to the General Assembly. Ark. Code Ann. § 19-10-211(a)(3).
- (2) If a Claimant is awarded less than \$15,000.00 by the Claims Commission at hearing, that claim is held forty (40) days from the date of disposition before payment will be processed. *See* Ark. Code Ann. § 19-10-211(a). Note: This does not apply to agency admissions of liability and negotiated settlement agreements.
- (3) Awards or negotiated settlement agreements of \$15,000.00 or more are referred to the General Assembly for approval and authorization to pay. Ark. Code Ann. § 19-10-215(b).

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

NOTICE OF APPEAL 19-10-211 [2] [1]Arkansas  
State Claims Commission

JUL 31 2025

CLAIMANT  
RECEIVED

LAWRENCE MARTIN ADC# [REDACTED]

V. CLAIM NO. 250817

ARKANSAS DIVISION OF CORRECTION

RESPONDENT

RE: ORDER IN ABOVE CASE.

CLAIMANT'S CORRESPONDENCE TO STATE CLAIMS COMMISSION  
WAS DISCARDED AS IT IS STATUS OF CLAIM ETC.

CLAIMANT FILED A HABEAS CORPUS PETITION IN  
U.S. DISTRICT COURT EASTERN DIVISION 600 WEST CAPITOL  
[REDACTED] SUITE 402 LITTLE ROCK, ARKANSAS 72201 LAWRENCE  
MARTIN V. DEXTER PAYNE, CASE NO. 4:22-CV-01271-KGB.  
ON APPEAL, LAWRENCE MARTIN V. DEXTER PAYNE, CASE NO.  
23-3505 CLAIMANT CAUGHT RESPONDENTS IN FEDERAL -  
COURT COMMITTING PERJURY, FALSIFYING AND ALTERING  
DOCUMENTS 24-1 TO 24-4, CLAIMANT'S CASE MADE THE  
NEWS ONE OF THE ATTORNEY GENERALS GOT FIRED: MS.  
KARAN V. WALLACE WAS FIRED. THE MAGISTRATE AND  
CHIEF DISTRICT JUDGE GOT CAUGHT UP COVERING UP  
PERJURY, AND THEY VIOLATED THE INMATE/EMPLOYEE DRUG  
TESTING POLICY THAT WAS IN PLACE IN 2022, CLAIMANT'S  
RIGHT TO NOT BE PUNISHED, WAS CLEARLY ESTABLISHED!. WHAT  
HAPPENED NEXT WAS THE UNITED STATES DISTRICT COURT CASE  
NUMBER 4:22-CV-01271 KGB; EIGHTH CIRCUIT COURT OF APPEALS;  
[REDACTED] UNITED STATES SUPREME COURT AND STATE CLAIMS COM-  
MISSION DID NOT GIVE CLAIMANT OPPORTUNITY TO LITIGATE

PERJURY, RESPONDENTS FALSIFIED DOCUMENTS AND DID NOT SEND CLAIMANT ~~DRUG~~ DRUG TESTS TO LAB TO CONFIRM THE UNIT'S TEST, NEVERTHELESS, DISTRICT COURT ACKNOWLEDGED NONE OF THE RESPONDENTS WERE LICENSED TOXICOLOGISTS.

RES JUDICATA - OPPORTUNITY TO LITIGATE DOCTRINE OF RES JUDICATA DOES NOT APPLY IF PARTY [MARTIN] HAS NOT HAD OPPORTUNITY TO LITIGATE ISSUE OF PERJURY, TESTS. MARTIN, CLAIMANT, HAS REQUESTED 4 WEEKS AGO THE U.S. DEPARTMENT OF JUSTICE IN LITTLE ROCK, ARKANSAS TO INVESTIGATE AND FILE CRIMINAL CHARGES AGAINST RESPONDENTS FOR: 18 U.S.C.A. § 1519 DESTRUCTION, ALTERATION, - FALSIFICATION OF RECORDS IN FEDERAL INVESTIGATIONS; § 2 J. 2. OBSTRUCTION OF JUSTICE; § 1001 STATEMENTS OR ENTRIES GENERALLY; § 242 DEPRIVATION OF RIGHTS UNDER COLOR OF LAW; AND 004.03-1-832 DISCRIMINATION AND RACIAL ISSUES.

☐ SINCERELY,

Jacqueline Martin

7/24/25