

MAR 16 2000

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

*Let this be  
filed as  
approved +  
so ordered*

**FILED**

MAR 9 - 2000

NANCY MAYER-WHITTINGTON, CLERK  
U.S. DISTRICT COURT

C.A. No. 74-285

*Hogan, J.  
March 6, 2000*

WILLIAM DIXON, et al.,

Plaintiffs,

v.

ANTHONY A. WILLIAMS, et al.

Defendants.

**CONSENT ORDER**

WHEREAS the District of Columbia has represented to the Court and the parties that it is committed to operating the District's mental health system in compliance with the Court's orders, and whereas the parties agree to a process by which the operation of the mental health system shall be returned to the District of Columbia, it is hereby ORDERED:

1. The Receiver, Scott Nelson, shall immediately begin the process set out below to transition the return of the mental health system to the District of Columbia government.
2. Effective April 1, 2000, Dennis R. Jones shall be appointed Transitional Receiver.
3. The Transitional Receiver shall promptly designate an acting Chief Operating Officer who shall be responsible for day-to-day operations of the mental health system and who shall assist the Transitional Receiver with implementing the Court's decrees and orders. In addition, the Transitional Receiver shall promptly develop, in consultation with the parties, a cost-effective plan designed to implement the orders and decrees in this case. Any contested issues regarding the content of the plan shall be resolved by the Court. The District of Columbia government shall be required to implement the plan.
4. By April 1, 2000, Dr. Nelson shall transfer the duties and responsibilities set forth in paragraphs 1-6 of the Court's June 13, 1997 Order, as well as all powers specified in the June 13, 1997 Order, to the Transitional Receiver. Dr. Nelson shall work with the

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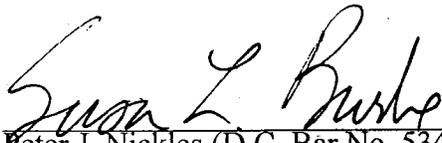
Transitional Receiver to ensure an orderly transition consistent with the obligations imposed by the Court's orders in this case.

5. By May 1, 2000, Dr. Nelson shall receive one month (160 hours) of severance pay from the defendants. In addition, Dr. Nelson shall be reimbursed in an amount not to exceed \$20,000 for those expenses incurred prior to May 1, 2001, that defendants are required to pay pursuant to the September 21, 1998 Court order.
6. By January 1, 2001 at the earliest, or April 1, 2001 at the latest, as determined by the Transitional Receiver, the day-to-day operations of the mental health system shall be returned to the District of Columbia government.
7. Immediately upon the transfer required by paragraph 6, above, there shall commence a probationary period not to exceed six months to determine if the District of Columbia has the capacity to implement, and is implementing, the plan. During the probationary period, the Transitional Receiver shall monitor the District's operation of the mental health system. If at any time during the probationary period the Transitional Receiver determines that the District of Columbia government lacks the capacity to implement, or is not implementing, the plan, the Transitional Receiver may petition the Court for an order returning the day-to-day operations of the mental health system to the Transitional Receiver. Any contested issues regarding the petition shall be resolved by the Court.
8. Sixty days following commencement of the probationary period, the parties shall submit to the Court for approval the criteria for termination of the decrees and orders in this case as well as a schedule for the monitoring referred to in paragraph 10, below. Any contested issues regarding the termination criteria or schedule shall be resolved by the Court.
9. At the conclusion of the probationary period, if the Transitional Receiver certifies that the District of Columbia government has the capacity to implement and is implementing the plan, the Transitional Receivership shall be vacated. The parties may submit any dispute regarding the Transitional Receiver's determination directly to the Court.
10. After the Transitional Receivership is vacated pursuant to paragraph 9 above, the former Transitional Receiver shall monitor the District of Columbia government's compliance with the implementation plan, consistent with the schedule required by paragraph 8, above. The Transitional Receiver, as a result of monitoring the District of Columbia government's compliance with the implementation plan, shall no later than October 30, 2001, submit to the Court recommendations regarding the termination of the orders in this case. Any contested issues regarding the termination recommendation shall be resolved by the Court.
11. The Transitional Receiver shall make reasonable efforts to exercise his authority in a manner consistent with: (1) the laws and regulations of the District of Columbia; and (2) the authority and directives of the Control Board and the Chief Financial Officer.

However, where those laws, regulations, and entities clearly prevent the Transitional Receiver from carrying out the duties and responsibilities set forth in this Order, the Transitional Receiver may petition the Court to waive any requirements imposed thereby.

12. The Transitional Receiver shall consult on a regular and ongoing basis with class members and other consumers, mental health providers, and other stakeholders in the District of Columbia's mental health system and government. The Transitional Receiver is encouraged to promote consumer involvement in the planning, evaluation, and delivery of Dixon-related services.
13. The Transitional Receiver shall have access to all relevant District of Columbia personnel, records, and facilities.
14. The Defendants shall be responsible for all costs incurred in the implementation of the policies, plans, and decisions of the Transitional Receiver relating to the fulfillment of this Order.
15. The Transitional Receiver shall be indemnified in the same manner and to the same extent as other agency heads within the District of Columbia government.

Agreed to for plaintiffs:

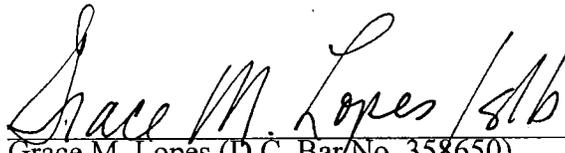


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Mental Health Division  
St. Elizabeth's Hospital  
2700 MLK Avenue, SE  
Washington, D.C. 20032  
(202) 645-8400

Dated: February 29, 2000

## Curriculum Vitae

**Name:** Dennis R. Jones

**Address:** Midtown Community Mental Health Center  
1001 W. 10th Street  
Indianapolis, IN 46202  
(317)630-8800

**Home Address:** 5365 N. Washington Blvd.  
Indianapolis, IN 46220  
(317)252-2656

**Place of Birth:** Akron, OH

**Date of Birth:** October 27, 1945

**Education:** Wheaton College  
Wheaton, IL  
B.A. 1967  
Major in Literature

Indiana University  
Indianapolis, IN  
Master of Social Work (M.S.W.) 1969  
Major in Casework

Butler University  
Indianapolis, IN  
Master of Business Administration (M.B.A.) 1977  
Major in Financial Management

### Professional Experience:

February 1996 - to Present      Director, Midtown Community Mental Health Center

September 1994 - February 1996      Administrator, Midtown Community Health Center and  
Special Consultant, Indiana University Department Of Psychiatry

July 1988 - September 1994      Commissioner, Texas Department of Mental Health & Mental Retardation

July 1981 - June 1988      Commissioner, Indiana Department of Mental Health

1979 - 1981      Executive Director, Indiana Council of Community Mental Health Centers

CV-VITAE.WPD  
April 13, 1998

- 1976 - 1979 Administrator, Midtown Community Mental Health Center, Indianapolis, IN
- 1974 - 1976 Program Director, Midtown Community Mental Health Center, Indianapolis, IN
- 1971 - 1974 Team Director, Midtown Community Mental Health Center, Indianapolis, IN
- 1969 - 1971 Clinical Social Worker, Midtown Community Mental Health Center, Indianapolis, IN

**Professional Memberships (Boards or Commissions) From 1981 to Present:**

- Addiction Services Advisory Council - Chair 1981 - 1988
- Governor's Commission on Future Directions in Mental Health (Secretary) 1981 - 1982
- Juvenile Justice Task Force 1984 - 1988
- Governor's Task Force on Drunk Driving 1983 - 1988
- Interdepartmental Board for Human Services 1981 - 1988
- National Association for State Mental Health Program Directors

Board Member	1985 - 86
Treasurer	1986 - 87
President	1988 - 89

- Search & Screen Committee for Director of NIMH 1987
- National Advisory Mental Health Council 1986 - 1990
- Advisory Council University of Texas School of Social Work 1989 - 1991
- Advisory Board - Indiana University School of Social Workers 1995
- Board of Visitors - Indiana University School of Nursing 1995

**Awards:**

- Charles Bosma Award for Outstanding Service to Mental Health 1984
- Indiana University School of Social Work Outstanding Alumni Award 1984
- Recipient Sagamore of Wabash 1987
- Outstanding Achievement Award Texas Alliance for the Mentally Ill 1991
- Outstanding Service Award, Texas Society of Psychiatric Physicians 1991