

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA**

**DECLARATION**

STATE OF LOUISIANA    )  
PARISH OF ORLEANS    )

I, Ralph Anderson, declare the following is true to the best of my knowledge.

1. I am 28 years of age and competent to sign this declaration.
2. I am a prisoner at Orleans Parish Prison and expect to be here until I am transferred to Angola Correctional Facility.
3. While in Orleans Parish Prison, I was recovering from a recent surgery on both my legs from a gunshot wound. I entered Orleans Parish Prison in a wheelchair. I was not seen by any medical staff or cleared by a doctor to be removed from my wheelchair but my wheelchair was taken from me and I was given crutches. Less than a week later guards came and took my crutches, again without me seeing any medical staff. I was then placed in a 10 man holding cell in general population. The cell was already overcrowded and I was forced to sleep on the floor, even though I was not recovered from my surgery. I was unable to stand for long periods of time and I was unable to get myself off the ground in the morning. I was forced to ask for assistance from other people being housed in the cell. While I was in the 10 man cell I was very vulnerable to violence because I was unable to defend myself; this caused my belongings to be taken from me multiple times.
4. The only way Orleans Parish Prison and Sheriff Gusman responded to multiple calls and complaints from my family about my current medical condition was to place me on 23 hour lock down protective custody on the 8<sup>th</sup> floor of the House of

Detention. Sheriff Gusman assured my family and I that I would not have a cellmate during my time on the 8<sup>th</sup> floor due to my inability to protect myself and the nature of my condition. On the 14<sup>th</sup> of January, 2012 I received a cellmate. This was after my family and I had been reassured that I would not have a cellmate because of my medical condition and violence I was already subjected to. When my cellmate first arrived I did not feel safe at all. I was very vulnerable because of my medical condition with my legs and I felt that I was open to violence at any time. I filed a grievance on the 14<sup>th</sup> of January the fact that I had a cellmate and was not supposed to have one but I never received a reply.

5. The sliding front of the cell that opens and closes and allows people to enter and leave the cell are being held closed with shackles. I witnessed the Fire Marshal come onto the tier and tell guards that the shackles are a fire hazard and that they need to come down. They did not come down and are still being used to hold the cells closed.

On this, the 30 day of March 2010, I declare under penalty of perjury that the foregoing is true and correct.

By: Ralph Anderson  
Ralph Anderson

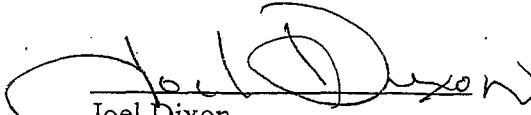
**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA**

**DECLARATION**


STATE OF LOUISIANA    )  
PARISH OF ORLEANS    )

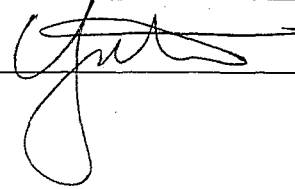
I, Joel Dixon, do hereby declare:

1. I am currently incarcerated in Old Parish Prison in Orleans Parish Prison.
2. During my time in the facility, I have witnessed several incidents of prisoner on prisoner violence.
3. Before I was on the medical tier, I saw one incident of sexual violence. Multiple prisoners locked another man in a cell and raped him. I couldn't see everything that was going on because I was in the adjacent cell, but I could hear everything.
4. Recently on the medical tier, a guy who really needs some mental healthcare lunged at me and scratched me under my jaw with something sharp. It left a mark from my chin to my jaw. I know he needs help and wasn't getting any, because I helped him fill out sick calls before the incident. He told me all the prescription medication he was on prior to coming to jail. He also told me that he wasn't getting that medication in here. As far as I know, he never received treatment.
5. The same guy got in another fight a few weeks later. He was trying to spit on us and gouge people's eyes out. I'm not mad at him. He needs help. Like all of us, he just needs help. If medical had only responded to those sick calls, these fights never would have happened.
6. I have struggled with depression since I've been back here, but I didn't want to say anything because I don't want to go to HOD 10. I even had plans to commit suicide, but was too afraid to ask for help.
7. When a fight or other incident occurs, we are discouraged from reporting it. If someone rats to a guard, the guards will tip off the tier as to who the rat is, so the guys on the tier can punish or intimidate him.
8. Guards aren't around for the fights and then they encourage more violence by telling the prisoners who reports them.
9. They have been painting a lot of the tiers recently, trying to make things look better. But they are merely camouflaging their inadequacies. It is going to take a lot more than paint to make us safe.

  
Joel Dixon

Sworn before me this 1 day of April, 2012.

  
Witness



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA

DECLARATION

STATE OF LOUISIANA     )  
PARISH OF ORLEANS     )

I, Brent Gill, do hereby declare:

1. I am currently incarcerated in the Temporary Detention Facility in Orleans Parish Prison.
2. Before I got here, I was in the Broad Street Work Release program.
3. I had a lot of problems over there. Guards weren't giving me paychecks, they threatened me and tried to get me to fight them.
4. I started filing grievance after grievance for all of these things, but I never got a response back. One time I heard one of the guards say, "He just don't know. He keeps writing grievances, and we're just gonna keep ripping them up." I think they started retaliating against me since I kept filing grievances on them.
5. I have also seen guards throw grievances away.
6. After a while I started filling out two grievances at a time so I could give my attorneys a copy of what I was writing.
7. I don't know what else I'm supposed to do to get my money back or make sure I'm safe, since I never get a response to my grievances.

On this, the 1 day of 4<sup>th</sup> Month 2012, I declare under penalty of perjury that the foregoing is true and correct.

X Brent Gill  
Brent Gill

Sworn before me this 1 day of 4<sup>th</sup> month 2012.

M. Yates

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA**

**DECLARATION**

STATE OF LOUISIANA     )  
PARISH OF ORLEANS     )

I, Joshua Hobson, do hereby declare:

1. I was formerly incarcerated in Orleans Parish Prison from late November 2011 to the middle of December 2011.
2. During my time there I witnessed guards encourage violence and cheer fights on between inmates until the first blood was drawn. I had to remain constantly alert to an attack from guards or other guys on my tier. When I tried to draw attention to the situation, I was intimidated, harassed and ignored by the Sheriff's staff.
3. When I first arrived I was put in a holding cell in the House of Detention before my First Appearance. While I was waiting I witnessed a guard drag two bleeding inmates down the hallway. The guard threw them into the holding cell with me. One had a dime size hole in his head. After a little while, the guard came back and dragged the two men out of the cell to the elevator where he threw them in like trash and said, "serves you to niggers right."
4. In early December I was dragged out of my bed at night by several guards. They threatened to hurt me and hit me a few times in an attempt to intimidate me from publicizing the appalling conditions.
5. In addition to the violence and abusive guards, the grievance procedure is non-existent. Prisoners in OPP have absolutely no way of reporting problems. While in custody, I tried three different times to file grievances. The first time I tried to turn one into a guard, he read it in front of me and then ripped the grievance into little pieces in front of my face. The second and third times I filed a grievance, deputies took the forms, but I never received a response.
6. As a result of all of this I became hopeless. I stopped eating and couldn't sleep. These were the worst weeks of my life.

I declare under penalty of perjury that the foregoing is true and correct, this the 31  
day of March, 2012.

  
Joshua Hobson

Sworn before me this ~~30~~ day of March, 2012.

  
Witness

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA**

**DECLARATION**

STATE OF LOUISIANA     )  
PARISH OF ORLEANS     )

I, J.J., hereby declare:

1. I am a pre-trial detainee currently incarcerated in the House of Detention. I am locked in a cell with my cell-mate for twenty-three hours a day.
2. I was transferred to Orleans Parish Prison from the Youth Study Center four days after my arrest and spent several months in Templeman Phase V.
3. During my time in Orleans Parish Prison, I have been beaten up by tier-mates, abused by guards and neglected by medical staff. I am afraid for my life. This is no place for a juvenile.

**HOD 10**

4. Early on in Templeman V, I got really depressed and thought about hurting myself. Before I did, though, I reported my thoughts of suicide. In October I was moved to the tenth floor of the House of Detention for suicide watch.
5. When I arrived on HOD 10, guards made me strip down in front of several people and put me in a vest without any shoes. Then the guards put me in a shower that was full of urine and semen. I asked for my shoes, but the deputies refused to give them to me. Because I didn't want to sit or lay down in the mess, I stood in the entire night.
6. During the night I spent in HOD, I heard someone get raped. When he told the guard the next day, the guard said "you're lying." Another time I saw a guard pepper spray a prisoner.
7. Since that incident I am afraid to tell the guards if I feel suicidal. I asked to see a nurse twice for depression but no one came to see me. I do not want to tell them if I feel like hurting myself, though, because I do not want to be sent back to the tenth floor.



Templeman V

8. In Templeman V the other guys on tier harassed, threatened, beat and abused us in every way possible. They pulled shanks on us, stole our stuff and contaminated our food.
9. Guys were getting raped on the tier.
10. The guards yelled at us and called us rats for talking to our lawyers about what is happening.
11. Even after I was protective custody I got jumped because the guards do not protect us.

House of Detention

12. When I got out of Templeman, they put me on a maximum security tier in HOD with adults. All the cells popped open and one of the adults hit one of the kids who came over with me. Guards were not on the tier to protect us. I have never been so scared in my life.
13. I'm still scared when I leave my tier to go to attorney visits or court because those guys in Templeman have people all over this jail who can get me. Guards don't do much to protect me and it only takes a second to get stabbed. Only takes a second to lose your life. I am also worried about new kids coming to Templeman V. I have heard that guys are still getting jumped back there. There's nowhere safe for us.

On this, the 1 day of April 2012, I declare under penalty of perjury that the foregoing is true and correct.

X J. J.  
J.J.

Sworn before me this 1 day of April, 2012.

[Signature]  
Witness

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA**


**DECLARATION**

STATE OF LOUISIANA    )  
PARISH OF ORLEANS    )

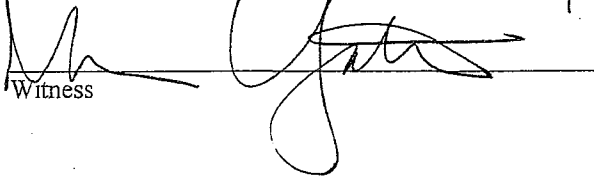
I, Nicholas Miorana, do hereby declare:

1. Around Mardi Gras I grew extremely depressed. I asked to see a psychiatrist, but guards told me I had to go to HOD 10 to see a psychiatrist, so I said I was suicidal in order to get sent there.
2. When I arrived, I was first put in the suicide tank. I waited in my underwear with other guys. I couldn't use a phone to call anyone. Guards wouldn't let us out to go to the bathroom. The following morning I saw the psychiatrist. When he learned I was never suicidal and just wanted to talk to someone about my troubles, he became angry. He had a really bad attitude and kept telling me if I want to talk, talk to a social worker. But it's almost impossible to get an appointment with the social worker here.
3. I asked to go back to Old Parish, but guards put me on the tier with this small, young guy who was just coming on too. I watched as some bigger guys stabbed the little one a bunch of times in the neck and his body. Two of them had knives. The little guy tried to fight back and was yelling loudly. Guards finally came and opened the gate to the tier, but wouldn't come on the tier.
4. The kid made his way out and immediately lay down. His blood was pooling all around him. I came off with him because I didn't want to stay on that tier after that. It took a long time before the ambulance arrived.
5. Guys have almost died on the tier because guards are never around. Sometimes it takes 30 or 45 minutes of banging on the door before guards respond.
6. This is serious. You can die in here. You can easily be killed any day. On some tiers, inmates have shackles. There are at least two to ten knives on every tier. If you report something, though, you'll probably get stabbed up. Animals can't live back here, much less human beings.

On this, the 1 day of April 2012, I declare under penalty of perjury that the foregoing is true and correct.

  
Nicholas Miorana

Sworn before me this 1 day of April, 2012.

  
Witness

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA

DECLARATION

STATE OF LOUISIANA    )  
PARISH OF ORLEANS    )

I, Damon Patterson, hereby declare:

1. I am a pre-trial detainee currently housed in the Tents in Orleans Parish Prison.
2. Since my arrest, I have witnessed several violent incidents including fights between inmates and beatings by guards. I try to stay out of it and stay safe. No one in safe in here, though.
3. After a few days in the House of Detention I was transferred to Tent One. I didn't have any problems there, but I saw one guy get stabbed up. He was hurt so badly that they put him in the Hole to heal up. They put guys in the Hole since you don't get visitation when you're in there. That way your family can't see how bad you're hurt.
4. It's not just inmate on inmate violence in there. I've seen guards beating on people in Tent One. They take guys into the back area by their office. They tell everyone to get away from the gate and then they beat the guys up. It happened a lot, usually during the night shift. The guys that have been beaten up by guards were mostly young and almost always were handcuffed for the beating.
5. Later on, I was transferred to Tent Six where I am now. Tent Five and Six are worse than the other tents. They are a cesspool for violence and corruption. Since I have been in Tent Six I've seen fights and stabbings.
6. Fights are allowed in here. Guards let them do it, either by putting guys together they know are going to fight, or by not stopping the fights once guys get into it. But mostly it's because they're never around. You only see a guards a few times a day.

On this, the 1 day of April 2012, I declare under penalty of perjury that

the foregoing is true and correct.

X Damon Patterson  
Damon Patterson

Sworn before me this 1 day of April, 2012.

[Signature]  
Witness

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA**

**DECLARATION**

STATE OF LOUISIANA     )  
PARISH OF ORLEANS     )

I, Jelpi Picou, an individual of the age of majority, do hereby state:

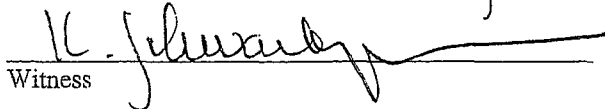
1. That I was incarcerated in Orleans Parish Prison for one year and was released on or around July 15, 2011.
2. During this period, I witnessed systemic prisoner on prisoner violence as well as abuse and neglect by the guards in several Orleans Parish Prison facilities.
3. For instance, I was held temporarily in the Templeman V facility directly across from the juvenile tier. There were no visual obstructions between the tiers, and guards often encouraged us to watch the juveniles beat each other for entertainment.
4. Guards are aware of the rampant violence on the juvenile tier of Templeman V, yet, they do nothing to curb or prevent it. In fact, they provoke violence by turning off the televisions, aware that the lack of stimulation leads to fights.
5. Prisoner on prisoner violence is not contained to the juvenile tier of Templeman V. A culture of violence exists across all facilities under Sheriff Gusman's control, due to the guards' failure to patrol tiers, enforce safety measures and respond efficiently to emergencies.

6. I witnessed most violent acts occurring when guards were absent from the tier for several hours at a time. When guards do make rounds, they perpetuate the violence by taunting and inciting prisoners through verbal abuse. The resulting experience of humiliation and emasculation among the prisoners leads to increased instances of aggression.
7. On the rare occasion that guards are present for a physical altercation, they wait either for its conclusion or until prisoners to draw blood before responding to scene.
8. On top of the hostile and unsafe environment, OPP lacks an established grievance system. If you file a grievance about someone on your tier, the guard tells them within in minutes which puts you at risk. If you file a grievance against a guard, they usually rip it up and throw it away. Consequently, you feel cut off from any type of order. You are totally on your own.
9. Due to the pervasive violence across facilities coupled with the lack of available institutional remedies, juveniles suffering physical and sexual abuse in Templeman V will not benefit from transferring to an adult facility. Prisoners and guards alike identify the weakest targets to attack, thus putting juveniles at a heightened risk in facilities outside of Templeman V.

I declare under penalty of perjury that the foregoing is true and correct, this the 18<sup>th</sup> day of January, 2012.

  
Jelpi Picou

Sworn before me this 18<sup>th</sup> day of January, 2012.

  
Witness

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA**

**DECLARATION**

STATE OF LOUISIANA     )  
PARISH OF ORLEANS     )

I, Paul Robinson, do hereby declare:

1. I am currently incarcerated on the tenth floor of the House of Detention in Orleans Parish Prison.
2. I am afraid for my life in here. They're really stabbing people up. I have heard guards beat on people, I have seen guys get in fights, and guys have attacked me too.
3. When I was in Old Parish Prison my cellmate pushed me, and I fell and hit my face on the toilet. My face was swollen. My nose was also busted and bleeding. I didn't tell the guards I got in a fight, but they moved me anyway. I never did get medical attention for my face, though. There's no help in this place.
4. Now I'm on the tenth floor and I'm afraid to come off of it because people are waiting to get me back in Old Parish Prison. People are out to get you all over this jail and guards don't stop it. Guards encourage it. The tenth floor isn't even safe. I just checked off my tier because I was afraid for my life. I've never done that before because it makes you look weak.
5. All the cells pop open up here and guards only come through a few times a shift. I think I would only be safe on PC. We're all in a house of danger back here.

On this, the 1 day of April 2012, I declare under penalty of perjury that the foregoing is true and correct.



X Paul Robinson  
Paul Robinson

Sworn before me this 1 day of April, 2012.

[Signature]  
Witness

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA


DECLARATION

STATE OF LOUISIANA     )  
PARISH OF ORLEANS     )

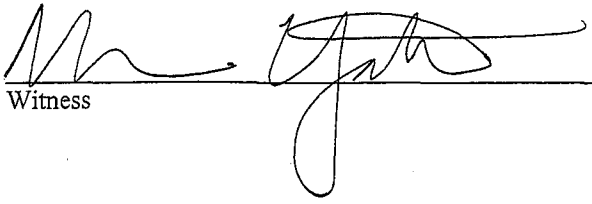
I, Ben Sabine, do hereby declare:

1. I am currently incarcerated in Old Parish Prison in Orleans Parish Prison, waiting for a bed to open up in a rehab program.
2. I'm on the medical tier right now because I was on crutches when I was arrested. I had just gotten a tumor taken out of my leg.
3. A little while ago, one of the guys I was cool with gave some of my pills away. I got upset with him and then he put his shoes on to fight. While we were fighting in the back away from the guards, two other guys came up behind me and hit me on the head and face over and over like they were boxing. I was seeing stars by the end. When it was over, my eyes were swollen and black and I had to get stitches at LSU for a cut under my eye.
4. Another time a guy on the tier stabbed someone up when he thought someone stole his stuff. The guy that got stabbed had to run to the window and start banging on it to get someone's attention. He was yelling, "I got stabbed! I got stabbed!"
5. For all of these fights, guards weren't around. Because I'm on a medical tier, though, it is the safest tier to be on. I can't imagine what goes down on the regular tiers.

On this, the 1 day of April 2012, I declare under penalty of perjury that the foregoing is true and correct.

  
Ben Sabine

Sworn before me this 1 day of April, 2012.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end, positioned above a horizontal line.

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Witness

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA**

**DECLARATION**

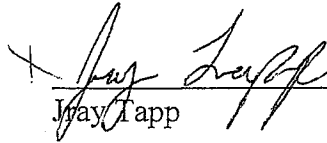
STATE OF LOUISIANA     )  
PARISH OF ORLEANS     )

I, Jray Tapp, do hereby declare:

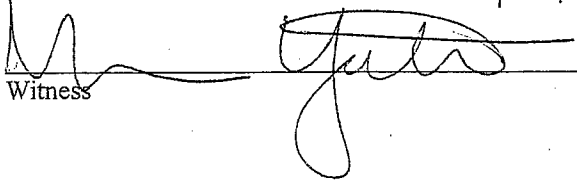
1. I was incarcerated in Old Parish Prison in February and March of 2012.
2. The weeks I spent in OPP were the worst weeks of my life. Immediately after booking I was put on the tenth floor. I spent some time in the suicide tank and then was released to a cell with a ton of other people in it. I didn't have a bed or a mat, so I asked a guard if I could have a mat. He sent another inmate in with one. I went to grab it, but he stabbed me in the back in the neck. I passed out and when I came to, there were two guys kicking and stomping me. I tried to fight back, but they just kept hitting me. They stabbed me again, and I passed out a second time. They stole my shoes when I was blacked out.
3. Altogether, they stabbed me once in the neck, multiple times in the head and the back. My hand was also sliced when I tried to grab the knife. I also had two black eyes and my face was all swollen up.
4. It took a while for guards to respond. Then the nurses came. It took even longer for an ambulance to get there. The whole time I was just lying in my own blood. I was in shock. I was shaking. There was blood oozing everywhere and I couldn't breathe. Then I started coughing up blood and stuff.
5. Guards were yelling at me to shut up. They said I wasn't even hurt that bad. I told them I couldn't move my head, so one of them grabbed my neck and yanked it around to prove that I could.
6. When I got to the hospital, they gave me fluids and cleaned out my wounds. A few hours later they brought me to jail and put me back on the tenth floor, but a different tier. One of the guys in my cell needed a colostomy bag. Since he didn't have one, he was just making a mess all over himself and the cell. I didn't have a mat or a bed and I slept on the floor for a few nights.
7. They moved me to the Tents after a few more days. But some big guy came up and told me I took his rack. He put his shoes on for a fight. Then he slammed me on the ground a couple of times and hit me too. My face puffed back up and he bruised my elbow. The worst part was that my stab wounds opened back up.

8. I'm really lucky to have made it out of there alive, but I'm worried about everyone still in OPP. I'm not the only person this has happened to and I know that it will continue to happen unless some action is taken.

On this, the 1 day of April 2012, I declare under penalty of perjury that the foregoing is true and correct.

  
Jay Tapp

Sworn before me this 1 day of April, 2012.

  
Witness