

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

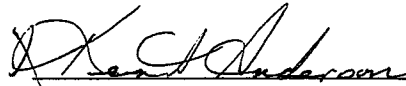
DECLARATION

STATE OF LOUISIANA)
PARISH OF ORLEANS)

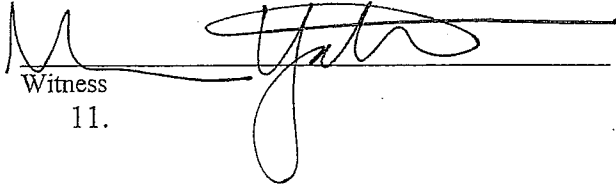
I, Kent Anderson, do hereby declare:

1. I am currently incarcerated on the tenth floor of the House of Detention in Orleans Parish Prison.
2. I suffer from several health conditions including stress and anxiety. My fiancé tried to bring my prescriptions to jail to show the doctors what I was taking on the outside, but the deputy said, "we don't deal with that."
3. I put in several sick calls, but most times they are never answered. It took a really long time and lots of sick calls before I got any medicine. When I filed a grievance on not getting the medicine, they told me to file a sick call.
4. Some of the nurses on duty refuse to pass out medicine.
5. I recently came to the tenth floor of HOD from Old Parish Prison because I was getting really depressed. I told someone that I was thinking about taking pills to kill myself.
6. I was put on suicide watch and when I got off, the psychiatrist was hard to talk to, like I did something wrong. I needed help, but he only spent a couple minutes with me.
7. I put in another sick call last week to see the psychiatrist. I keep having nightmares and am really stressing. When I saw the psychiatrist he told me to talk to a counselor. He said, "I'm a fucking doctor! That's it. I prescribe medicine. If you want to talk, talk to a fucking counselor!"
8. I have met a lot people with mental health issues in here. None of them are getting the help they need. I feel all alone. Sometimes I get claustrophobic. The medicine isn't helping much and there's no one to talk to. It's hard to keep waking up.
9. I believe that this lawsuit is in my best interest. I want to bring this lawsuit so that I can make the prison safer for me and all the other prisoners here now and in the future.
10. I will fairly and adequately represent the interests of all the prisoners in Orleans Parish Prison.

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


Kent Anderson

Sworn before me this 31 day of March 2012.


Witness
11.

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

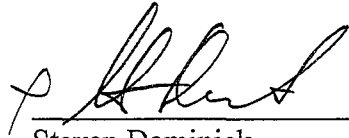
DECLARATION

STATE OF LOUISIANA)
PARISH OF ORLEANS)

I, Steven Dominick, do hereby declare:


1. I am currently incarcerated on a protective custody tier in the House of Detention in Orleans Parish Prison. I am on lockdown for twenty-three hours a day.
2. I have been threatened with knives, jumped, and stabbed. I have also witnessed many stabbings since I have been OPP.
3. Guards do nothing to prevent the violence. In fact, they often instigate it. When severe injury results from a fight, guards fail to respond with urgency. It can take hours for a deputy to come on the tier. Consequently, I have had to apply pressure to knife wounds and called family members to contact 9-1-1 since the guards refuse to help.
4. When I was at Old Parish Prison, they put a transgendered woman on my tier. She was living life fully as a woman and had breasts and everything. Guys were giving her a really hard time and I was worried for her. I kept telling guards they needed to move her. There was also gay, effeminate, white guy on the tier at one point. People would take him into the shower and coerce him to perform oral sex. I didn't see it, but I could hear it. It could happen because we were all alone for hours. I still struggle thinking about how I couldn't protect him.
5. I came to HOD protective custody from Old Parish Prison since I was testifying against someone in a trial. But this isn't protective custody. There are shanks everywhere and everyone's cell pops open. I have informed the jail of this breach in security, but nothing has been done to rectify it.
6. These facilities are not undermanned, they are unmanned. Deputies frequently leave their posts. Guards typically work two floors during one shift, especially in Old Parish Prison. It doesn't matter what facility you are in, you're going to be lucky to escape without some scars.
7. I believe that this lawsuit is in my best interest. I want to bring this lawsuit so that I can make the prison safer for me and all the other prisoners here now and in the future.
8. I will fairly and adequately represent the interests of all the prisoners in Orleans Parish Prison.

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



Steven Dominick

Sworn before me this 31 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, Anthony Gioustavia, do hereby declare:

1. I am a pre-trial detainee incarcerated at Old Parish Prison in Orleans Parish Prison.
2. An older, bigger guy attacked me when I first rolled in. Guards weren't around when it happened. It lasted a long time.
3. I have seen lots of other fights. One time some men grabbed this little guy when he was sleeping and started to fight him. Another time, there were two guys with knives fighting on the open tier. One of them got stabbed in the mouth and twice in the back. Other guys with knives were watching and were waiting to fight.
4. Guards are never around when fights break out, which is often. They usually come by for count time and then leave again for hours. I don't feel like they are doing much to protect any of us.
5. I believe that this lawsuit is in my best interest. I want to bring this lawsuit so that I can make the prison safer for me and all the other prisoners here now and in the future.
6. I will fairly and adequately represent the interests of all the prisoners in Orleans Parish Prison

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

X Anthony Gioustavia
Anthony Gioustavia

Sworn before me this 1 day of April, 2012.

Witness [Signature]

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

DECLARATION

STATE OF LOUISIANA)
PARISH OF ORLEANS)

I, Jimmie Jenkins, do hereby declare:

1. I am a pre-trial detainee currently incarcerated on the tenth floor of the House of Detention in Orleans Parish Prison.
2. I am locked in my cell for twenty-three hours a day, but the locks pop so people can get out when the guards aren't looking.
3. Before I was arrested, I was taking prescription medication for my bipolar disorder. I have not gotten my medication here in OPP.
4. It's hard without my medicine in here and not being able to talk to a counselor or social worker. Plus, there are fights all the time. I came over to the psych tier in order to get some help after a guy stabbed me up in Old Parish Prison. I have been hit here too and seen lots of other fights. I just got punched a couple weeks ago when a guy was trying to steal my cookies.
5. I thought it would be better on HOD 10, but guards leave us unattended just like they do in Old Parish Prison and I still haven't had any mental healthcare.
6. I believe that this lawsuit is in my best interest. I want to bring this lawsuit so that I can make the prison safer for me and all the other prisoners here now and in the future.
7. I will fairly and adequately represent the interests of all the prisoners in Orleans Parish Prison.

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

Jimmie Jenkins
Jimmie Jenkins

Sworn before me this 31 day of March, 2012.

[Signature]
Witness

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

DECLARATION

STATE OF LOUISIANA)
PARISH OF ORLEANS)

I, Greg Journee, do hereby declare:

1. I am a pre-trial detainee currently incarcerated on the seventh floor of the House of Detention in Orleans parish Prison.
2. Before I got to HOD, I was in Old Parish Prison. There, I had to move because of threats I was getting. When the warden finally moved me he said, "you know this is a jail facility. I can't make sure that nothing happens to you."
3. When I moved to HOD I was jumped by a bunch of guys right after I got on the tier. Some of them held me while another one stabbed me over and over. I was bleeding all over and yelled for a deputy. No one came until the next day. When a guard finally came, he didn't do anything. I never even received medical attention.
4. All of the cells pop in all of the tiers and guards leave us alone. People on my tier have shanks so big, they look like kitchen knives. Guys can get out and come get you any time. The guards aren't going to do anything to stop it. I don't think anyone is safe in here.
5. I believe that this lawsuit is in my best interest. I want to bring this lawsuit so that I can make the prison safer for me and all the other prisoners here now and in the future.
6. I will fairly and adequately represent the interests of all the prisoners in Orleans Parish Prison.

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

Greg Journee
Greg Journee

Sworn before me this 31 day of March 2012.

M. Yates
Witness

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

DECLARATION

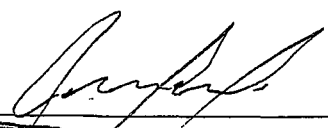
STATE OF LOUISIANA)
PARISH OF ORLEANS)

I, Richard J. Lanford, do hereby declare:

1. I am currently incarcerated in the Conchetta facility in Orleans Parish Prison. I have also been held at the House of Detention and the Old Parish facilities.
2. Since my arrest in August 2011, I have been jumped at least three times, and other inmates have attempted to sexually assault me and threatened to kill me numerous times. I have sustained multiple physical injuries as a result of these attacks, and have had to be taken to the hospital for surgery to treat broken bones and lacerations experienced as a result of getting jumped.
3. I was placed in the Old Parish facility because my bail was really high. Old Parish is where they keep the most violent offenders – yet my offense was not violent. Putting me in there with violent people exposed me to a lot of physical and emotional harm, stress, anxiety, and fear.
4. The first time I was jumped in September, my arm was twisted behind me. As a result, I can't move my arm. I am in a lot of pain but the guards say my arm is fine and won't give me medical attention to see if the ligaments in my arm are torn. When I reported this incident right away to the guards, they told me I was lying and refused to get me help or to move me away from the inmates who jumped me.
5. I was jumped again in November and had my cheekbone and jaw broken. The guards ignored me and made me wait over an hour before giving me any medical attention. I had to be taken to the hospital for surgery to have these injuries fixed.
6. Just weeks later, I was jumped in the medical tier of the Old Parish facility where I was recovering from surgery required to repair my broken cheekbone and jaw. I was jumped by a guy who thought I was a rat for complaining about getting jumped earlier.
7. Because I reported getting jumped all three times so I could get medical attention, everywhere I go men call me a rat – in my cell, on my tier, at court. I never know when I might run into someone who wants to hurt me.

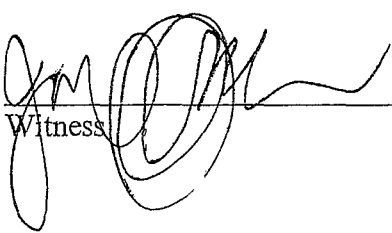
8. Because of the severe violence and threats I was receiving in the Old Parish facility, I both asked and my judge ordered that I be moved to Conchetta but it took months for me to be moved. Now that I am in Conchetta, I'm on a tier with one of the men who attacked me at the Old Parish facility. I still don't feel safe.
9. The guards keep these facilities unsafe. Guards patrol two floors at once, so my tiers have gone without supervision for long periods of time. When guards are present, they ignore us and sleep. When I was recovering on the medical tier at the Old Parish facility, the guards would leave our cells open, which caused me to get attacked again.
10. I have seen violence happen constantly in the House of Detention and in the Old Parish Prison facilities. This violence includes men getting jumped, and men with knives stabbing other inmates.
11. I am being prescribed pain medication as a result of the numerous injuries I have sustained from other inmates. The nurses bring me large quantities of my pain medication at a time – usually enough to last me for one to two weeks. Having this many pills on me at once threatens my safety – other inmates know that I have large amounts of pills on me and threaten to attack me if I don't give them away.
12. I am extremely depressed as a result of the violence and conditions in this place. I am constantly looking over my shoulder, convinced someone else is going to try and get me. I feel like I have aged ten years in the six months I've spent here.
13. I know that sexual assault happens here from other inmates, and I have had inmates attempt to sexually assault me. I would rather die than have someone do that to me. Having that happen to me is my worst nightmare.
14. We are treated like animals here. The conditions are horrible – there is mildew everywhere and it is making me sick. Toilets are always broken and the food is disgusting.
15. I believe that this lawsuit is in my best interest. I want to bring this lawsuit so that I can get my physical injuries fixed, and to make the prison safer for me and all the other prisoners here now and in the future.
16. I will fairly and adequately represent the interests of all the prisoners in Orleans Parish Prison.

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



Richard Lanford

Sworn before me this 1st 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, Leonard Lewis, hereby declare:

1. I am a pre-trial detainee currently housed on the ninth floor of the House of Detention. This is a protective custody tier. I am locked in my cell twenty-three hours a day.
2. I was transferred to HOD from Old Parish Prison about seven months ago, because I am testifying against another prisoner. But time and again jail officials keep putting me in unsafe situations with him. I have been threatened, beat up and stabbed multiple times in different buildings since my arrest. No one responds when I ask for help. No one is safe in here.
3. During the 2010 summer I was in the holding tank. A deputy put me in a cell with a guy that knew the prisoner I'm testifying against. He stabbed me up a bunch of times. The guard knew he was my enemy, but he didn't care. I think he wanted to see one of us get hurt.
4. I filed a grievance, asking that a supervisor deal with the deputy. The grievance I got back said I was placed in the holding cell by mistake.
5. I filed another grievance because that is not an acceptable mistake to make. My life is on the line. I asked in my Step Two grievance, "what if I would have got hurt real bad?"
6. The next response said that the matter was already taken care of. I filed a third grievance, saying that the other guy had a knife and if it wasn't for a female deputy who passed by, I would have been cut up.
7. Two years later, I received a response to that grievance from Sheriff Gusman himself. It should not take two years to take me seriously. No one cares about my safety or anyone else's in this place. I know because in those two years it took to get a response, I was jumped several more times.
8. After I was on protective custody, they took me to court with general population. I ended up getting stabbed and jumped by a bunch of guys when I was on the docks waiting for court.
9. I got jumped again by a couple of guys when I came back after another time in court. Someone yelled out, "I heard you were a rat." The cells were open and this guy came

into my cell and started fighting me. Some other guys came and joined in against me. Deputy Lyons knew it was going to happen. He locked the interlock so I couldn't run off the tier. I yelled for help, but it took a long time to get a deputy's attention.

10. My whole face was swollen from the fight and I think my nose was broken. A nurse just gave me an ice pack.
11. I filed another grievance on it, and Warden Louque said SOD was investigating. But I haven't heard anything from SOD since. They moved me up to another PC floor, but I still feel unsafe.
12. We're not actually in protective custody up here. The deputies are never around and all the cells pop open. No one is doing their job. They're all just busy covering up for each other.
13. On March 27, 2012 I went to court, but was brought with the guy I am testifying against. Everyone knows I'm not supposed to be in court with him. Everyone knows I'm testifying against him. They just don't care. I told someone from the Special Operations Division that I was not supposed to be with that guy, but he wouldn't do anything.
14. I was walking right behind him into court. When we were by the judge's desk he turned around and said, "stupid bitch." Then he spit in my face. I'm lucky he didn't do something worse. The DA saw what happened and asked if I was OK, but SOD didn't do a thing.
15. I filed another grievance on this when I got back to jail from court, the same day. I don't think those grievances do a thing, though, and sometimes you can't even get a form or turn it in. The mail lady hasn't been by for weeks and the last time I saw her, she said they didn't have any more copies of the forms.
16. We're on our own in here. I just pray that I make it out of here alive. People die back here. I don't want to be the next one to die, and I don't think anyone else should die back here either.
17. I believe that this lawsuit is in my best interest. I want to bring this lawsuit so that I can make the prison safer for me and all the other prisoners here now and in the future.
18. I will fairly and adequately represent the interests of all the prisoners in Orleans Parish Prison.

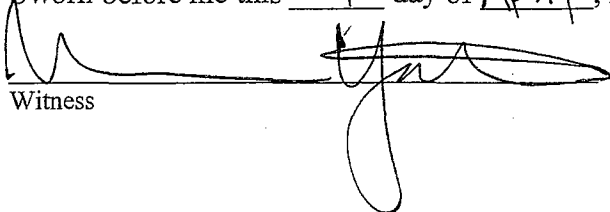
On this, the ___ day of _____ 2012, I declare under penalty of perjury that the foregoing is true and correct.

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



Leonard Lewis

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, Euell Sylvester, do hereby declare:

1. I am currently a pre-trial detainee, incarcerated in the House of Detention in Orleans Parish Prison. I am protective custody and am supposed to be on lockdown for twenty-three hours a day.
2. Prior to my arrest, I pressed charges on someone. When I was arrested, the jail didn't check for this conflict. They put me in the same building as my defendant, who put a hit on me.
3. Because of the hit, a lot of guys came up to me one night and started giving me a hard time. Things escalated until they stripped me, restrained me and beat me in the middle of the night. Some of them had knives. They hit me with their slippers and mop buckets. The beating tore the skin off my back.
4. They sexually assaulted me including anal penetration.
5. During the attack, a deputy came on the floor, but he never looked into the tier. If he had, he would have seen what was happening. But deputies don't really care about what happens to us.
6. The next morning I did not receive any medical treatment. I never got a rape kit even after I reported what happened. I had to file something to get HIV/STD testing and it took months for them to even give me that.
7. Since the beating in Old Parish Prison, guards have put me in contact with my defendant and my attackers a few more times. It's like they want to see me get messed up.
8. I'm on protective custody now, but I still don't feel safe. All the cells pop and guys are always threatening me, both on the tier and when I go to court. They tell me they're going to beat me up. I complain to guards and ask them to move me, but they refuse.
9. Anywhere they put me, I'm not going to be safe. All of our safety is at risk. The guards aren't doing their jobs and there are knives everywhere. Plus, I think they try to set up the fights. I don't care why anyone is in this jail. We are still human beings and we do not deserve this. This violence has got to stop.


10. I believe that this lawsuit is in my best interest. I want to bring this lawsuit so that I can make the prison safer for me and all the other prisoners here now and in the future.

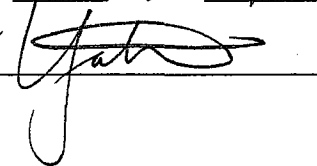
11. I will fairly and adequately represent the interests of all the prisoners in Orleans Parish Prison.

On this, the 30 day of March 2012, I declare under penalty of perjury that the foregoing is true and correct.


Euell Sylvester

Sworn before me this 30 day of March 2012.


Witness



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

DECLARATION

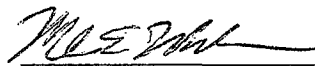
STATE OF LOUISIANA)
PARISH OF ORLEANS)

I, Mark Walker, do hereby declare:

1. I am currently incarcerated in Orleans Parish Prison on a medical tier in Old Parish Prison.
2. I am diagnosed with bipolar disorder and am legally blind.
3. Since my arrest in October 2011, I have been in the House of Detention, Orleans Parish Prison, Conchetta and the Tents. I have not been safe from harm in any of these facilities. I have been raped, beat up by guards, jumped by prisoners, had my stuff stolen, and denied access to mental healthcare. Nobody, especially those of us with a physical or mental disability, are safe here.
4. Shortly after my arrest, I was forced to perform oral sex while I was sitting on the toilet. I started making noise as loud as I could, but people in the cell got mad at me for yelling and the guards didn't check on me. I reported it to a guard afterwards, but he didn't believe me.
5. I was put on homicide/suicide watch after the assault because I told the guard if he did not protect me, I would defend myself. On suicide watch I asked for grievances to report the rape. Guards kept telling me, "We don't have any," or "It's not even worth giving you a grievance because I can't give you a pen to fill it out since you're on suicide watch." I had to ask every day for weeks until I obtained a grievance form and pen.
6. I don't think the grievances I wrote were ever turned in because people from the special investigation division didn't come see me for forty-one days after the assault. I didn't tell them everything because they interviewed me in front of other prisoners and I didn't feel comfortable.
7. It took a really long time for the jail to give me HIV testing. I still have not gotten my results back.
8. Before they moved me from HOD 10, I was jumped a couple times. In Tent One I was jumped again repeatedly and had cleaning solution sprayed in my eyes. I was moved around different tents and I kept getting jumped. Guards were never around to protect me or to break up the fights. I think they were smoking outside.

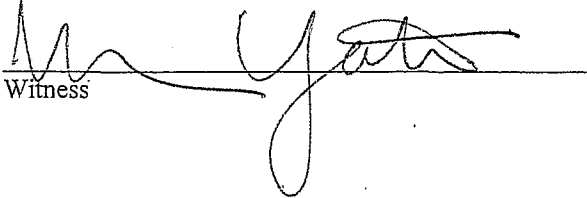
9. In December a guard told me to pack up. I obeyed, but he said that I hit him with my mat when I grabbed it to go. He got so mad that he took me and beat me up in the back part of Tent One. I was handcuffed and couldn't protect myself. He beat me so badly that a female deputy, who had been laughing at first, finally stepped in to stop him.
10. Now I'm in Old Parish. Recently a guy was harassing me in the shower. When I tried to tell jail officials about it they said to me, "do what you gotta do."
11. I have filed multiple sick calls for a variety of complaints. When I finally saw medical, they said that my sick calls were never put in the computer. How can I see the social worker if they do not put my sick calls in the system?
12. The guards do not patrol the tiers, they do not respond to verbal complaints or grievances. Like everyone else in here, I am constantly in fear for my well-being.
13. I believe that this lawsuit is in my best interest. I want to bring this lawsuit so that I can make the prison safer for me and all the other prisoners here now and in the future.
14. I will fairly and adequately represent the interests of all the prisoners in Orleans Parish Prison.

On this, the 30 day of March 2012, I declare under penalty of perjury that the foregoing is true and correct.



Mark Walker

Sworn before me this 30 day of March, 2012.



Witness