

ORIGINAL

U.S. DISTRICT COURT DISTRICT OF TEXAS FILED OCT 15 2008 CLERK, U.S. DISTRICT COURT By <u>[Signature]</u> Deputy

INMATE DECLARATION

RE: Dallas County Texas Jail
Deadly Conditions of Confinement

United States v. Dallas Co. Texas
N.D. Tex USDC Case No. # 3:07-cv-01559

I, Lakeith Amir-Sharif, TDCJ # 1505969
being presently incarcerated in the Texas
penal system [J. H. Byrd Unit], declare
under penalty of perjury that the following
statements are true and correct based
on my personal knowledge:

1.) A copy of this document is being sent
to the federal court/judge presiding over
the above-referenced case, and to Adan
Munoz, Jr, Executive Director, Texas Commission
on Jail Standards.

2.) I suffer from chronic illnesses that
have been made known to the defendants
in the referenced federal lawsuit, upon my
arrival to the Dallas County jail on August
28, 2008.

3.) As a result of my own federal litigation

(1 of 3)

3.) cont - Against the same defendants about health and safety violations, they knew or should of known of my chronic care needs and responded appropriately.

4.) From August 28, 2008 to September 25, 2008, at which time I was transferred from the Dallas County jail back to TDCJ, I "NEVER" received any medications.

This is despite the fact that I brought with me my medications, for epileptic seizures, asthma, T.B., genital warts, oral ulcers and chest pains, and they were given to book-in staff.

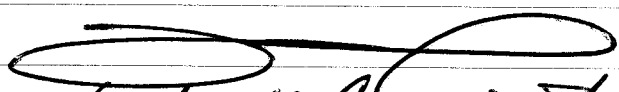
5.) Moreover, all my grievances went ignored and this includes my September 22, 2008, letter of complaint to Parkland Hospital - Onsite Director Mr. Patrick Jones.

6.) This lapse in care, particularly of someone as myself, is unacceptable and unnecessarily exposed me to potentially life-threatening harm. It further illustrates the deliberate indifference of jail staff to my health and safety, and that of others confined there.

7.) I "NEVER" received any follow-up and was forced to sleep on the floor beside

- 7.) cont - The toilet because no procedure was in place, or was followed, to ensure [low-bunk, low-floor] standard seizure precaution protocol was followed by jail staff responsible with housing assignment duties.
- 8.) There remains serious mold contamination [and trash] in the heating ventilation and air-conditioning system, thus exposing myself and others to a rotten source of Legionnaire's Disease.
- 9.) Some cells, especially in the jail's North Tower has so much trash cluttered inside the ventilation system that little to no air can properly circulate in the affected cells.
- 10.) Cleaning supplies are issued but mops are not being adequately cleaned out by trustees between uses. Also trustees are not being made to wash hands and wear clean clothing before handling food served.

Dated on: October 06, 2008


Laketh Amir-Jariff (#1505969)
Byrd Unit, 21 F.M. 247
Huntsville, TX 77320
(3 of 3)

October 06, 2008

United States District Court
Northern District of Texas
Attn: Office of The Clerk
1100 Commerce Street
Dallas, Texas 75242-1699

RE: Case No. 3:07-cv-1559-N ^{U.S. v. Dallas Co. TEXAS}
Exhibit Submitted For Filing - Dallas Jail Conditions

Dear Clerk:

Please file the enclosed
Declaration in the above-referenced
case as an exhibit.

Thank You,

Laketh Amir-Sharif (#1505969)
J.H. Byrd Unit, 21 F.M. 247
Huntsville, Texas 77320

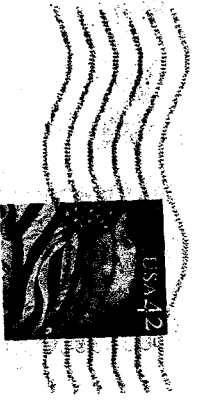
LAB/(1) ENCLOSURE

cc: Prison Legal News.com
Austin - American Statesman
U.S. Dept. of Justice - Special Litigation Section

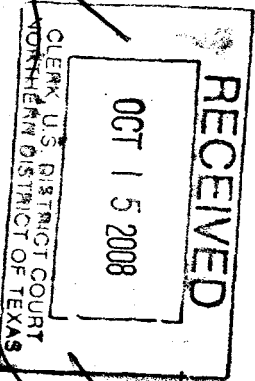
LOKETH Amie Sheriff (# 1505969)
J.H. Byrd Unit

21 E.M. 247
Abilene, Texas 77320

09 OCT 2008 PM 7 L



[Handwritten signature]



U.S. District Court
Abilene District of Texas
Office of The Clerk
1100 Commerce Street
Abilene, Texas
75602-4037

[Large handwritten signature]

1100 Commerce Street
Abilene, Texas 75602-4037