

EXHIBIT 11

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENWOOD/ANDERSON DIVISION

Disability Rights South Carolina and 15) Civil Action No. 8:22-cv-01358-MGL-MB
Unnamed Plaintiffs as Class)
Representatives on behalf of)
themselves and others similarly)
situated,)
)
Plaintiffs,)
)
v.)
)
Richland County,)
)
Defendant.)

DECLARATION OF
[REDACTED]

I, [REDACTED] pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct:

1. Hello, my name is [REDACTED], I have been inmate at Alvin S. Glenn since December 3, 2023. The conditions that we are living in are inhumane and others very hazardous. I see favoritism with CO with other inmates. I have witnessed death twice. The lack of organization of this detention center has caused health, mental and physical damage to us living here currently. After 2 days of being here I started a timeline and wrote down every major error I could keep track of.

2. I started being housed on Delta Unit, December 6, 2023 was the first major incident I experienced at ASGDC. Another inmate was found unconscious laying on another bunk. Inmates ran to officer station yelling code blue while another inmate performed CPR and others grabbed cooler for ice. During this time 5-6 officers stood around watching inmates save a life, not 1 attempted CPR. 1 officer had Narcan he administered it after us working on her for 10-15 minutes. After the total of 30-35 minutes EMS showed and took her. After this terrible incident I started keeping track.

3. I was in Delta from December 5-13th, 2023 Delta is open dorms that housed about 35-40 female inmates. During this time no working lights in either bathrooms, including the showers. Several male inmates climbed through our ceiling which could of raped or harmed us. We went days without toilet paper and was told there wasn't any. Providing 1 water cooler, there was several times I was able to get 1 cup per day. December 13, 2023 at 3:30 p.m. I still had not received lunch. I attempted to escape the detention center on December 13, 2023.

4. After being recaptured, December 13, 2023, my new housing unit was X-Ray. They put me in room X-Ray 34. The conditions of cell was horrible. They kept me in cell for 6 days, no running water in sink and toilet did not flush. I asked for grievances and to be moved. Never received a grievance it took for officer from Richland County Sheriff Department request my move to new cell and that didn't happen to next day.

5. X-Ray is a behind the door unit, not 1 cell had working lights. Water puddles laid on floor due to all the bad toilets and sinks from our cells. There has been several days no water is available for us. I had put in several sick calls for lower back pain. It took for my mother to call for them to pull me. They attempted to draw blood for testing of kidneys both attempts failed due to dehydration this was in January. They never tired again. They sent me back to give urine sample in cup was instructed to give to CO. Urine sample was thrown out. Sat for days never gave to nurse. We would go days of being locked down without any rec time. We would go hours in between meals without a CO event on unit. In Delta a CO was only present during med pass. During my stay here I have went 3 times without being fed. We would eat dinner in the dark due to no lights. We would put stuff under our doors to keep rats out of cells.

6. February 22, 2024, the women in X-ray moved to Juliet which I am currently being housed in a cell that water leaks from toilet and again no working lights. They struggle to keep water on the unit and we have days no rec is given. On March 2, 2024 another terrible incident took place that could have been avoided or helped. Inmate [REDACTED] committed suicide in cell next to me. I am in X-36, she was in X-37. That day CO Dukes came on unit we was locked

down. Inmate ██████ asked if she was mental health. She was told no. CO served us dinner locked down she left. I heard ██████ on tablet talking. Then it became silent until I heard light fixture sound of falling. Didn't know at time that was noise I was hearing. This day after CO fed us no other CO came on what time that was noise I was hearing. This day after CO fed us no other CO came on until almost 11 p.m. for med pass. Nobody checked on us and due to there lack of staff and again conditions because light fixtures are exposed with wire hanging etc. has resulted in the death of a 22 year old girl.

7. I have re-wrote my timeline to provide you a copy of a more day to day troubles of my current stay at Allen S. Glenn that are below.

8. December 3, 2023 – Came to Alvin S. Glenn on an unknown warrant for FLA.

9. December 5, 2023 – Heard noises in ceiling and was told male inmates travel through our dorm ceiling to get outside.

10. December 5 – 10th – Asked for grievances from several different officers; no one ever brought me any back. Was worried with male inmates traveling through ceiling after being raped by someone who was then an inmate (before we were incarcerated).

11. December 6, 2023 – Inmate ██████ was found O.D. Code Blue was yelled. There happened to be guard on unit at time. Not 1 CO attempted any CPR on her. CO had Narcan who waited 10-15 minutes to use it. Inmates performed CPR for 30-40 minutes before any EMS came and took her to hospital. The only time a guard was on Delta was during med pass, other than that inmates was alone in open dorm.

12. December 11 and 12, 2023 – Several male inmates have been traveling through ceiling.

13. December 13, 2023 – I asked officer for grievances, water cooler, and toilet paper at 3:30 p.m. before deciding to try and leave. I did not get a grievance form. No toilet paper or water was brought to unit.

14. December 13, 2023 – After being recaptured, no dinner was given. I was moved to Unit X-Ray for 15 day lock-up. X-Ray 34 toilet did not flush. I was told to be there just for the night.

15. December 14, 2023 – Never served me breakfast; gave me double lunch tray; but no dinner.

16. December 15, 2023 – Turned on sink, it flooded. Told CO sink was about to overflow. She asked my name and said welcome to X-Ray. Asked for grievance. None was ever brought. Never moved me or allowed to clean cell for 2 days water on floor. I was in X-Ray 34 without a flushing toilet or running sink water for 5 days before moving me to X-Ray 20.

17. December 13-16th – Every time I asked for water, I was told they had no cup for me. After a full 2 days, an inmate put water in a baggie for me to drink out of. And after a day or two inmates found me a cup to use.

18. December 17, 2023 – Went to bond court. Went back to booking with other women. Officer Gray made several flirtatious remarks to us in kitchen. Got us 2 trays and 2 juices a piece. He told me to look him up after I made bail that he would like to do some things to me.

19. December 17, 2023 – Ask for grievances again request denied.

20. December 18, 2023 – Started period asked for underwear due to they took mine and never provided me with any. Was told they didn't have any pads only tampons and no underwear. I bled through 2 uniforms. Asked for grievances CO had none.

21. December 21, 2023 – Write a request about money all missing from account as well as it saying bad pin. Trying to order hygiene.

22. December 22, 2023 – Asked CO for grievance and to check about my pin. She had no grievances and said no response about my bad pin.

23. December 22, 2023 – Lawyer came to see me. He was very nice!

24. December 22, 2023 – First time eating a tray, food is gross.

25. December 23, 2023 – Moved into cell X-Ray 28, Cell flooded upstairs.

26. December 24, 2023 – Locked down all day. No hour out!
27. December 25, 2023 – Put another request in about money missing in account and bad pin.
28. December 27, 2023 – Received new pin still doesn't work/was to get out of 15 day lock up at 18:00, was told I am on administrative hold. Showed officer my paper CO Jefferson. Delta Unit – No officer ever there except med pass!!!
 - X-Ray unit first 6 days was only out 2 times. No cell has any lights inside wires hanging out from most light fixtures in cells.
 - She said she would show it to Lt. Pickney. When Jefferson returned to unit without paper in hand, I asked for it in return. She never brought it back.
29. December 28, 2023 – Asked Jefferson for paper with sanction on it. She said Lt. Pinkney has yet to give it back to her. I am still on 23- hour lockdown.
 - C/O asked grievance form from – Lt. Holmes; CO – pregnant one? Johnson; Corpal Davis – when he shut water off. Told him about missed meals, etc.; CO Jeffersons; CO Hayden; Hardwell.
30. December 31, 2023 – Put in another request for pin - \$ on account. Also, put request into classification about still being on lockdown after my 15 days. We did not get fed lunch until 4:15 p.m. No CO came on unit since breakfast that was served at 7:30 a.m. No water was given, not even our 1 hour out was given. They gave us a bag lunch and dinner tray at same time since lunch was forgotten.
31. January 1, 2024 – Nobody came out for recreation time. Forgot our dinner. We finally got dinner after 7:00 p.m.
32. January 2, 2024 – Was told by Lt. Williams I'm off pre-hearing lockdown after I was out for 20 minutes was told to go back to cell. Turned in sick call about hep. B.
33. January 3, 2024 – No recreation given; laundry day never happened; short on CO. Inmate worker came back to our unit X-Ray stated she had tried to get a CO to come feed us our

dinner. It had been sitting in Sally Port for a hour already. The CO stated she will get to us when she gets to us. It took another hour and 10 minutes for CO to come. Our dinner sat in Sally Port for over 2 hours. It was cold and due to no lights in cells, we eat in dark. Dinner was served at 8:06 p.m.

34. January 4, 2024 – Got 2 hours out/dinner at 5:00 p.m.

35. January 5, 2024 – No recreation time (no staff) heard there was another attempt escape during the night!

36. January 6, 2024 – 2 hours out/no water unit after 5.

37. January 7, 2024 – No recreation/no water till dinner.

38. January 8, 2024 – CO Mitchell refused my recreation due to my celly.

39. January 10, 2024 – Nurse came to get me. I lost 13 lbs since I been here. I'm 181.0 lbs. came in at 193.6. Also could not draw blood to dehydrated, supposed to try again Sunday.

40. January 11, 2024 – Must have no staff. Breakfast wasn't served until 8:30 a.m. hour 3 ½ late. No recreation.

41. January 14, 2024 – Breakfast came at 9:15 a.m. due to no CO to feed us. No recreation.

42. January 16, 2024 – Still no blood was drawn from nurse. Was informed by [REDACTED] that my urine sample sat for two days on CO desk. They threw it away!! Mother called. No return call to her.

43. January 17, 2024 – Nurses came. Took another urine sample. They tried to draw blood for cultures. Still to dehydrated.

44. January 19, 2024 – No recreation/nurse gave me bottle of water at 11:25 p.m.

45. January 20, 2024 – No recreation/Sgt. Pinckney took bottle of water. Said it was contraband.

46. January 21, 2024 – We had 30 minutes of recreation time. Breakfast at 8:10 a.m. Lunch at 11 and dinner at 3:45 p.m. Sgt. Pinckney.

47. January 22, 2024 – P.M. there was several lawyers that came on unit looking inside unit and cells. Moved to X-15.

48. January 23, 2024 – AM – the same people returned expecting cells and was watching med pass. My celly [REDACTED] takes meds. She asked for water and Sgt. Holmes told her just act for the white people.

49. January 24, 2024 – 30 minute recreation.

50. January 25, 2024 – No recreation/water given once.

51. January 26, 2024 – No recreation.

52. January 27, 2024 – 30 minutes of recreation. Breakfast at 9:16 a.m. CO Mitchell did not give water with lunch; refused it to everyone who asked.

53. January 28, 2024 – No recreation/Sgt. Holmes gave water at dinner. Inmates asked for pads and tampons. Told we didn't have any left handed out what was left already.

54. January 31, 2024 – No nurse still has tried to draw blood again!

55. February 1, 2024 – No recreation.

56. February 2, 2024 – No recreation.

57. February 3, 2024 – 2 hours out recreation/no laundry done.

58. February 4, 2024 – 2 hours recreation.

59. February 5, 2024 – No recreation.

60. February 6, 2024 – No recreation/CO left at 1:00 p.m. No CO came back until dinner which was served at 6:15 p.m.

61. February 8, 2024 – No recreation.

62. February 9, 2024 – No recreation.

63. February 10, 2024 – 1 hour recreation; no water; moved to X-Ray 36 which was a room with black spots on walls and ceiling due to fire.

64. February 11, 2024 – No recreation – water served during dinner.

65. February 17 – No recreation.

66. February 22, 2024 – No recreation; had preliminary; moved to Juliet (J-36) toilet leaks from bottom to flush, and its completely removed from wall. No lights in cell.

67. Attached hereto is my own hand-written statement that is the same in all material respects as this Declaration.

6-11-2024
Date

[REDACTED]

Mr. Stuart

3-12-24

Hello, my name is [REDACTED] I have been inmate at Alvin S. Glenn since December 3, 2023. The conditions that we are living in our inhumane and others very hazardous. I see favoritism with clo's with other inmates. I have witnessed death twice. The ^{lack of} organization of this ~~se~~ detention center has caused health, mental and physical damage to us living here currently. After 2 days of being here I started a timeline and wrote down ever major error I could keep track of.

I started being housed on Delta unit, December 6, 2023 was the first major incident I experienced at ASGDC. Another inmate was found unconscious laying on another bunk. Inmates ran to officer station yelling code blue while another inmate performed CPR and others grabbed cooler for ice. During this time 5-6 officers stood around watching inmates save a life not 1 attempted CPR. 1 officer had no can he administered it after us working on her for 10-15 mins, after the total of 30-35 mins EMS showed and took her. After this terrible incident I started keeping track.

I was in Delta from December 5-13th, 2023. Delta is open dorm that housed about 35-40 female inmates. During this time no working lights in either bathrooms, including the showers. Several male inmates climbed through our ceiling which could of raped or harmed us. We went days without toilet paper was told there wasn't any. Providing 1 water cooler there was several times I was able to get 1 cup per day. December 13rd at 3:30pm I still had not received lunch. I attempted to escape the detention center on December 13, 2023.

After being recaptured December 13, 2023 my new housing unit was X-ray. They put me in room X-ray 34 the conditions of cell was horrible. They kept me in cell for 6 days, no running water in sink & toilet did not

②

3/12/24

flush, I asked for grievances and to be moved. Never received a grievance and it took for officer from Richland Co Sheriff Dept request my move to new cell, and that didn't happen to next day.

X-ray is a behind the door unit, not 1 cell had working lights. Water puddles layed on floor due all the bad toilets and sinks from our cells. There has been several days no water is available for us. I had put in several sick calls for lower back pain. It took for my mother to call for them to pull me. They attempted to draw blood for testing of kidneys both attempts failed due to dehydration this was in January, they never tried again. They sent me back to give urine sample in cup was instructed to give to clo. Urine sample was throw out, sat for days never gave to nurse. We would go days of being locked down without any rec time. We would go hours in between meals without a clo even on unit. Delta a clo was only present during med pass. During my stay here I have went 3 times without being fed. We would eat dinner in the dark due to no lights. We would stuff under our doors to keep rats out of cells.

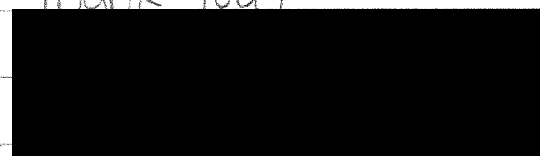
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3-12-24

I heard light fixture sound of falling. Didn't know at time that was noise I was hearing. This day after c/o fed us no other c/o came on unit until almost 11pm for med pass. Nobody checked on us and due to there lack of staff and again conditions because light fixtures are exposed w/ wire hanging etc. has resulted in the death of a 22 year old girl.

I have re-wrote my timeline to provide you a copy of a more day to day troubles of my current stay at Allen S. Glenn. If you have any questions or like to speak to me I have no issues with doing so.

Thank You,



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December 5, 2023 - heard noises in ceiling was told male inmates travel through our dorm ceiling to get outside.

Dec 5-10th - Asked for grievances from several different officers no one ever brought me any back. Was worried w/ male inmates traveling through ceiling of being raped by inmate.

December 6th? 2023 - Inmate [redacted] was found O.D. Code Blue was yelled there happened to be guard on unit @ time. Not 1 C/O attempted any CPR on her out of several C/O I had norecan who waited 10-15 mins to use it. Inmates performed CPR for 30-40 mins before any EMS came & took her to hospital. The Only time a guard was on Delta was during med pass, other then that inmates was alone in open dorm.

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December 13, 2023 after being recaptured no dinner was given I was moved to unit X-Ray for 15 day lock up. X-Ray 34 toilet did not flush I was told to be there just for the night.

December 14th 2023 - Never Served me breakfast, gave me double lunch tray, but no dinner.

December 15th 2023 - turned on sink it flooded told C/O sink was about to overflow she asked my name & said welcome to X-Ray. ^{Asked for grievance no one ever brought it.} Never moved me or allowed to clean cell for 2 days water on floor. I was in X-ray 34 without a flushing toilet or running sink water for 5 days before moving me to X-ray 20.

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December 21, 2023 - Wrote a request about money all missing from account as well as it saying bad pin. Trying to order hygiene.

December 22 2023 - Asked c/o for grievance and to check about my pin she had no grievances & said no response about my bad pin.

December 22, 2023 - Lawyer came to see me. He was very nice!

December 22, 2023 - first time eating a tray food is Gross!

December 23, 2023 - moved into cell X-ray 28, cell flooded upstairs

December 24, 2023 - Locked down all day No hour out!

December 25, 2023 - Put another request in about money missing in account & Bad Pin

December 27, 2023 - Received new pin still doesn't work / Was to get out of 15 day lock up @ 18:00, was told I'm on Admin hold showed officer my paper c/o Jefferson Della Unit - No officer ever was there except med pass!!!

she said she would show it to Lt Pickney. When Jefferson returned to unit w/o paper X-Ray Unit - first 6 days was only out 2 times. No Cell has any lights inside wires hanging out from most light fixtures in cell.

in hand I asked for it in return. She never brought it back

December 28, 2023 - Asked Jefferson for paper w/ Sanction on it she said Lt Pickney has yet to give it back to her. I am still on 23 hr lock down
- C/o Asked Grievance form from -

Lt: Holmes

c/o: Pregnant One? Johnson

Corpal Davis when he shut water off. Told him about missed meals etc.

c/o - Jeffersons

c/o - Hayden

Hardwell

12-31-23 - Put in another request for Pm/1st on account. Also put request into classification about still being on lockdown after my 15 days. We did not get fed lunch until 1:45 pm no c/o came on unit since breakfast that was served @ 7:30 am. No water was given, not even our 1 hour but was given. They gave us a bag lunch @ dinner tray @ same time since lunch was forgotten.

1-1-24 - Nobody came out for Rec time. Forgot our dinner we finally got dinner after 7 pm

1-2-24 - Was told by Lt Williams I'm off pre hearing lockdown after I was out for 20 mins was told to go back to cell. Turned in Sick Call about hep B

1-3-24 - NO Rec given / Laundry day never happened short on c/o. Inmate worker came back to our unit & Ray stated she had tried to get a c/o to come feed us our dinner it had been sitting in Sally Port for a hour already, they (c/o) stated she will get to OS when she gets to us. It took another hour & 10 mins for c/o to come. Our dinner sat in Sally Port for over 2 hours it was cold & due to no lights in cells we eat in dark. Dinner was served @ 8:00 am

1-4-24 - Got 2 hours out / dinner @ 5 pm

1-5-24 - No Rec time (no staff) heard there was another attempt escape during the night!

1-6-24 - 2 hours out / No water until after 5

1-7-24 - No Rec / No water till dinner

1-8-24 - C/o Mitchell refused my rec due to my cell

1-10-24 - Nurse came to get me I lost 13 lbs since I been here I'm 181.0 lbs came in 193.6. Also could not draw blood to dehydrated, supposed to try again Sunday.

1-11-24 - Must have no staff breakfast wasn't served until 8:30 am hour & 1/2 late. NO REC

1-12-24 - NO REC

1-14-24 - Breakfast came @ 9:15 due to ~~no~~ c/o to feed us. NO REC

1-16-24 - Still no blood was drawn from Nurse, who informed by Taylor Wardlaw that my urine sample sat for 2 days on c/o desk they threw it away! Mother called no returned call to her.

1-17-24 - Nurses came took another urine sample they tried to draw blood for cultures still to dehydrated.

1-19-24 - NO REC / Nurse gave me bottle of water @ 11:25 pm

1-20-24 - NO REC / Sgt Pickney took bottle of water said it's Contraband

1-

[REDACTED]

1-21-2024-We had 30 mins of rec time. Breakfast @ 8:10 Lunch @ 11
dinner @ 3:45 Sgt Pickney

1-22-24 P.M. there was several lawyers that came on
unit looking inside unit & cells. Moved to X-15

1-23-24 Am the same people returned expecting cells and
was watching med pass My Celly Jacqueline Kirpatrick
took meds she asked for water #Sgt Holmes told her
just act for the white people. 1-24-24 30 min Rec

1-25-24 No Rec / Water given once

1-26-24 No Rec

1-27-24 30 mins of Rec, Breakfast @ 9:16 am. c/o Mitchell did not
give water w/ lunch & refused it to everyone who
asked.

1-28-24 No Rec / Sgt Holmes gave water @ dinner, Inmates
asked for pads & TP was told we didn't have any
left handed out what was left already.

1-31-24 No nurse still has tried to draw blood again!

2-1-24 No Rec

2-2-24 No Rec

2-3-24 2 Hours out Rec / No laundry done


2-4-24 2 Hour Rec

2-5-24 No Rec

2-6-24 No Rec / cb left @ 1pm no c/o came back until dinner which
was served @ 6:15 pm

2-8-24 No Rec

2-9-24 No Rec



2-10 - 1 hr Rec - NO water - moved to x-ray 36 which was a room w/ black
soot on walls & ceiling due to fire.

2-11 - NO Rec - water served during dinner

2-17 - NO Rec

2-22 - NO Rec - had Prelim - moved to Juliet (J-36) toilet leaks from button
to flush, and it's completely removed from wall. No light in cell.