

EXHIBIT 24

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

Disability Rights South Carolina and 15 Unnamed Plaintiffs as Class Representatives on behalf of themselves and others similarly situated,)	Civil Action No. 4:22-cv-01358-MGL-TER
)	
)	
)	
)	DECLARATION OF [REDACTED]
)	
Plaintiffs,)	
)	
v.)	
)	
Richland County,)	
)	
)	
Defendant.)	

I, [REDACTED], pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is [REDACTED]. I have been incarcerated here at Alvin S. Glenn Detention Center since January 5, 2022. I have been housed in 5 different units but moved 7 different times. These units include Unit Papa, India, Juliet, X-Ray, uniform back to X-ray and moved to Juliet again. Conditions of Unit Papa weren't the worst at the time of my arrival it was decent and almost all cells were livable. Unit India a few cells weren't livable. There were water leaks here and there but it was livable as well. My first time being Juliet was only an overnight stay and the females in Unit Juliet were moved to Unit X-Ray. Unit X-Ray by far has been the worst unit I have ever been in. The living conditions were horrible, a majority of the rooms were unlivable there was a lot of contraband within the light fixtures, mats and visitation booths. We were given a directive by Captain Sligh and Lt. McCollough not to bring our mats that there would be mats given to us in Unit X-Ray. When we arrived at the unit it was full of garbage and contraband numerous amounts of weapons, phones, chargers. Multiple toilets have been snatched off of the wall as holding spots for contraband. Multiple rooms were with broken windows for "fishing rooms". I have found multiple fishing hooks.

2. A couple of months of being in X-Ray they did another mass move of the female to Unit Uniform and moved the "mental Health" females from Unit India into Unit X-Ray as Unit Uniform became the intake dorm for the females. I have been a trustee here for about a year and a half. However, I have been an in dorm trustee and a out-dorm trustee getting paid twenty-one dollars weekly. I have delivered chemicals to all fifteen dorms on a daily basis, folded laundry, pass out dorm supplies, dispose of trash, and clean and mop sally ports 7 days a week from 5 a.m. to 6:00 p.m. for twenty-one dollars a week as an out of dorm trustee. Working as an in-house trustee I serve chow to detainees, hand out the supplies, clean out cells as detainees come and go, refresh cells for mental health detainees who are incapable of doing for themselves, clean the day room and showers, hand out and assign tablets and handle laundry for free. As a dorm worker in the dorm I have bathed mental health patients covered in feces, I have cleaned rooms covered in feces. I have broken up endless amounts of fights to protect other detainees.

3. I am diagnosed with anxiety and depression. I am currently taking 40 mg of busbar, 50 mg of Visteril, and 5 mg of Ziprexa daily. Some days I have to remind the nurses my dosage. Mental health does not come see us as much as they should. When they do come to see us it is only one person and we don't have their full and undivided attention and the maximum amount of time may be about 15 minutes if that. We don't have any type of therapeutic programs. The most they will do is give us a coping skill sheet, coloring pages and some sport of guidelines, no real counseling nor any real therapy. We are only allowed to see the mental health doctor every three months.

4. When on disciplinary there is not much structure. They do not pay attention to the keep separate list, they do not move people back to their original housing arrangements. When placed on disciplinary, we are supposed to be dressed out into a stripe uniform. Speaking of disciplinary my friend that I consider my cousin [REDACTED] was housed in Unit Juliet on "disciplinary charges" she was spit on by another detainee. She received no days on disciplinary but was still housed in a lock-up unit. They are supposed to move the aggressor. On March 2, 2024, [REDACTED] hung herself from the light fixture that was hanging prior to her arrival. Her death could have been avoided if they would have properly housed her and had officer Johnson stayed at her post and not left early. [REDACTED] took her life around 7:00 p.m. that night. The officers are not supposed to leave their assigned post until the count clears. Earlier in that day the officer seen that she was in distress and didn't call mental health. From 4:00 pm. Up until 10-11 p.m.. we did not have an officer. Sergeant McClendon found her hanging during med pass. They took about 20-30 minutes to call the ambulance and the coroner removed the body around 1 or 2 a.m. I watched every single minute of it. The next day mental health came in and hasn't been back as often as they should be. I haven't been able to sleep since that day. I have seen mental health one time since then and have seen the mental health doctor once more. The proper protocol for disciplinary is to be moved back into General Population 90 days after your last write up. They do not follow these procedures. When charged with any in-house charges, you are supposed to see a hearing officer and they are supposed to hear your side of the incident but than likely they side with the officer who wrote the report and our days come from how the incident report was generated. Fifteen to twenty days no matter the charge. When on lockdown, we are locked down for twenty-three hours a day and receive REC for one hour if they feel like RECing the Pods, no television, no phones, and no commissary food, only stale food.

5. In Unit X-Ray, we were three to a room because there was no space in the unit to place others. The rooms in Unit X-Ray are unlivable. The rooms are full of mold, feces, either the sink and toilets are broken completely or either leaking. Some of the toilets don't flush, some sinks do not produce water. On most days in Unit X-Ray, we didn't have any officers and I had to run the unit if we wee let out by Lt. Williams. For the most part we have never ran out soak, tissue or toothbrushes and toothpaste. The things that are mandatory are the things we ran out of the most! Tissue, pads and tampons. On the days we didn't have tissue, they had us wiping with pads. Some days you were left in bloody or soiled uniforms. Detainees have been left in the rooms for days, weeks, months at a time without water, showers, outside time. [REDACTED] [REDACTED] [REDACTED] and more. [REDACTED] has been left in her own feces for days. I had to bathe her no help from staff. [REDACTED] use to smudge the feces on her door.

6. When it comes to protecting the detainees, the officers don't interfere they call for assistance and the higher ups respond to it. Ever since [REDACTED] committed suicide we have had an officer in the unit at all times. Another detainee [REDACTED] attempted to set herself on fire with the exposed wires from the lights after she got into a verbal altercation with an officer that almost lead into a physical altercation after that she attempted to set herself on fire. We barely

have had adequate supervision in X-Ray. Females have been jumped, doors have been popped by detainees. Some officers have popped doors and allowed detainees to fight. When there are drugs in the unit most officers allow them to smoke and remain high. I am the only female that I know of that has gotten stabbed as of recently when I got into a fight with another detainee. I was defending myself and the other detainee was given the opportunity to press charges against me when I wasn't the aggressor. As far as the stabbing with the men I've known for it to be on the news but I am unsure of incident reports or charges or any incident reports beyond Alvin S. Glenn Detention Center.

7. Attached hereto is my own hand-written statement that is identical in all material respects to this Declaration.

3/20/2024

Date

[REDACTED]

To whom it may concern

March 22, 2022

My name is [REDACTED]. I have been incarcerated here at Alvin S Glenn Detention Center since January 5 2022. I have been housed in 5 different units but moved 7 different times. These units include Units Papa, India, Juliet, X-Ray and Uniform back to X-Ray and moved to Juliet again. Conditions of Unit Papa weren't the worst at the time of my arrival it was decent and almost all cells were livable. Unit India a few cells weren't livable. There were water leaks here and there but it was livable as well. My first time being in Juliet was only an overnight stay and the females in Unit Juliet were moved to Unit X-Ray. Unit X-Ray by far has been the worst unit I have ever been in. The living conditions were horrible, a majority of the rooms were unlivable there was a lot of contraband within the light fixtures, mats and visitation booths. We were given a directive by Captain Sligh and LT Mc Collough not to bring our mats that there would be mats given to us in Unit X-Ray. When we arrived at the unit it was full of garbage and contraband numerous amounts of weapons, phones and chargers. Multiple toilets have been snatched off of the wall as holding spots for contraband. Multiple rooms were with broken windows for "fishing rooms". I have found multiple fishing hooks.

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I am diagnosed with anxiety and depression. I am currently taking 40 mg of busbar, 50 mg of Vistaril, and 5 mg of Zipaxa daily. Some days I have to remind the nurses of my dosage. Mental health does not come see us as often as they should. When they do come to see us it is only one person and we don't have their full and undivided attention and the maximum amount of time may be about 15 minutes of that. We don't have any type of therapeutic programs. The most they will do is give a coping skill sheet, coloring pages and some sort of guidelines, no real counseling nor any real therapy. We are only allowed to see the mental health doctor every three months.

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seen back as often as they should be. I haven't been able to sleep since that day. I can vision her hanging and I can hear the ciling cracking. I have seen mental health one time since then and have seen the mental health doctor once more. The proper protocol for disciplinary is to be moved back into General Population 90 days after your last write up. They fail to follow these procedures. When charged with any in house charges, you are supposed to see a hearing officer and they are supposed to hear your side of the incident but more than likely they side with the officers who wrote the report and our days come from how the incident report was generated. fifteen to twenty days no matter the charge. When on lockdown, we are locked down for twenty three hours a day and receive REC for one hour if they feel like RECing the pods, no television, no phones, and no commissary and only state food.

In Unit X-Ray, we were three to a room because there was no space in the unit to place others. The rooms in Unit X-Ray are unlivable. The rooms are full of live wires, mold, feces either the sink and toilets are broken completely or either leaking. Some of the toilets don't flush, some sinks do not produce water. I have shocked myself with the live wires before on the wall by the door. I have saved detainees life from a fire from the wires in X36. In most days in Unit X-Ray we didn't have an officer LT Williams would unlock the cells and I would run the unit. The intercoms do not work or are missing from the wall. For the most part we have never ran out of soap, toothbrushes or toothpaste.

The things that are mandatory are the things that we ran out of the most which are tissue, pads and tampons. On the days that we didn't have tissue they had us wiping with pads. Some days we were left in bloody or soiled uniforms. Detainees have been left in the rooms for days, weeks, months at a time without water showers or outside time [REDACTED] and more. [REDACTED] has been left in her own feces for days. I had to bathe her on my own with no help from the staff. [REDACTED] use to smudge the feces on her door.

When it comes to protecting the detainees, the officers don't interfere they call for assistance and the higher ups respond to it. Ever since [REDACTED] committed suicide we have had an officer in the unit at all times. Another detainee [REDACTED] attempted to set herself on fire with the exposed wires from the lights after she got into a verbal altercation with an officer that almost lead into a physical altercation after that that's when she attempted to set herself on fire. We barely have had any adequate supervision in X-ray. Females have been jumped, doors have been popped by detainees by either the panel not being disabled or by calling Central Control on the officer's phone. Some officers have popped doors and allowed detainees to fight. When there are drugs in the unit most officers allow them to smoke and remain high. I am the only female that I know of that has gotten stabbed as of recently when I got into a fight with another detainee, I was defending myself and the other detainee was given the opportunity to press charges against me when I went the

aggressor. As far as the stabbing with the men I've known for it
to be on the news but I am unsure of incident reports or
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