

EXHIBIT 26

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. My name is [REDACTED]. I am a high school graduate and I am currently incarcerated at ASGDC. I have been here for 2 years and 9 months. When I first got here on June 17, 2021 I was housed in PAPA unit. In the fall of 2022, I was moved to India unit. In the spring of 2023, I was moved to X-Ray unit. Then in the beginning of 2024, I was moved to Juliet unit. I have been a dorm worker for extended periods of time since X-Ray unit. Dorm working includes feeding, and cleaning but during my time working my duties extended far beyond that. Dorm work does not include any monetary for women in ASGDC. However, it does include dealing with many physically dangerous situations. It also demands facing many situations that are mentally damaging.

2. I myself am diagnosed with bipolar disorder, as well as some personality disorder issues. I am on Tegretol which serves as a mood stabilizer for me. There were times, especially during my time being housed in X-Ray that I did not receive my medication for many nights in a row. Sometimes I would have to utilize the security phone in order to get an officer to come down

to administer our medication. Some nights no one came at all. I received no form of therapy. There is none available. They offer printed word searches or printed lists of coping skills that is the extent of therapy. My mind is active and there is very little to stimulate it here. It seems to me that they are under the impression that mental illness and mental retardation are mutually exclusive. The two obviously do not go hand in hand. To be mentally ill here is to be treated like your suffering from an intellectual malady instead of an emotional one. I see my clinician every few months if I am lucky. I'm asked a few questions. My PTSD needs are often ignored as long as I'm not have any outburst. No outbursts here equals a happy staff and an unhappy detainee.

3. I live in the "lock-up" unit. I have my entire stay. I could be placed on 23 and 1 rec reschedule for a disciplinary sanction but most days that is my schedule when I am not on a sanction. My canteen could be removed if I were on sanction and I could rec alone. That rarely happens though. I have been living in a high security unit for 33 months. I have ben given no option to step down or to earn any better housing. People with similar charges and more disciplinary actions have been giving the opportunity I now could not imagine living in an open dorm. The thought of not having a door cause me stress. I do not "like to be in lock up" but I can't imagine not being in lock-up. As I said I have been behind a door for a very long time. The thought of not having a door gives me bad anxiety.

4. During my time as a dorm worker and even during my times off I have watched women go months without an opportunity to wash, without hygiene or feminine suppose, and without running water. I have seen women locked in rooms with toilets full of feces or without a sink or toilet in the room at all. I have had to help shower women like [REDACTED] who were in states of deep psychosis. Other women weren't lucky enough to receive help from anyone. [REDACTED], [REDACTED], [REDACTED], [REDACTED], those are a few names of women whom I have seen endure conditions that would have animal activists up in arms and a zoo closed down if its animals were treated so badly. I have seen them endure neglect that would send a pet owner seen them endure neglect that would send a pet owner to jail. Do we deserve that?

5. [REDACTED]. She was my friend. She was a young mother. She was full of life. Now she is a memory. On her last day she sobbed. She was far from the usual fiery, energetic, young woman we knew and loved. When I served her meals, I knew she was not herself. I tried to comfort her. The officer working that day rushed me out of her room. She said "come on I ain't got time to deal with all that." Officer Johnson left her shift early that as she does most days. At around 4 we were left alone. Around 7 they cut my friend down from her light fixture. It could have been avoided.

6. I lost my husband in October 2023 on Board River Prison yard. His name was [REDACTED] the same way. How many of us have to die? Our lives matter. My husband was a white man convicted of murder. [REDACTED] was a spirited young black woman convicted of nothing. Their lives mattered. So do their deaths. We ask that [REDACTED] name be added to the list of names of other young black lives list to blue on black crime and negligence.

7. Stabbings and fights are often a part of life here. Investigations into those situations are not. Many of us will carry physical and mental scars from this place for the rest of our lives. There is nothing here to better us. It I often a fight for survival. We came to a county detention center to await trial for a few months and we stay here for extended periods of time. Many people show up here accused of a crime and in their fight to survive leave guilty of crimes worse than the ones they were accused of. I hope this letter helps.

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

June 11, 2024
Date

[REDACTED]
[REDACTED]

To whom it may concern,

3.12.2024

My name is [REDACTED]. I am a high school graduate and I am currently incarcerated at ASGDC. I have been here for 2 years and 9 months. When I first got here on June 17, 2021, I was housed in PAPA unit. In the fall of 2022, I was moved to India unit. In the spring of 2023, I was moved to X-RAY unit. Then in the beginning of 2024, I was moved to Juliet unit. I have been a dorm worker for extended periods of time since X-Ray unit. Dorm working includes feeding, and cleaning but during my time working my duties extended far beyond that. Dorm work does not include any monetary for women in ASGDC, however it does include dealing with many physically dangerous situations. It also demands facing many situations that are mentally damaging.

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I live in the "lock-up" unit. I have my entire stay. I could be placed on 23 and 1 rec schedule for a disciplinary sanction but most days that is my schedule when I am not on a sanction. My canteen could be removed if I were on sanction and I could rec alone. That rarely happens though. I have been living in a high security unit for 33 months now. I have been given no option to step down or to earn any better housing. People with similar charges and more disciplinary action have been given the opportunity. I now could not imagine living in an open dorm. The thought of not having a door causes me stress. I do not "like to be in lock up" but I can't imagine not being in lock-up. As I said I have been behind a door for a very long time. The thought of not having a door gives me bad anxiety.

During my time as a dorm worker and even during my times off I have watched women go months without an opportunity to wash, without hygiene or feminine supplies, and without running water. I have seen women locked in rooms with toilets full of feces or without a sink or toilet in the room at all. I have had to help shower women like [REDACTED] who were in states

of deep psychosis. Other women weren't lucky enough to receive help from anyone. [REDACTED], [REDACTED],

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I lost my husband in Oct of 2023 on Broad River Prison Yard. His name was [REDACTED] the same way. How many of us have to die? Our lives matter. My husband was a white man convicted of murder. [REDACTED] was a spirited young black woman convicted of nothing. Their lives mattered. So do their deaths. We ask that [REDACTED] name be added to the list of names of other young black lives lost to blue on black crime and negligence.

Stabbings and fights are often a part of life here. Investigations into those situations are not. Many of us will carry physical and mental scars from this place for the rest of our lives. There is nothing here to better us. It is often a fight for survival. We came to a county detention center to await trial for a few months and we stay here for extended periods of time. Many people show up here accused of a crime and in their fight to survive leave guilty of crimes worse than the ones they were accused of. I hope this letter helps.

Sincerely,

