

EXHIBIT 6

Speers Declaration

DECLARATION OF TAMMY SPEERS

I, Tammy Speers, declare as follows:

1. I was an inmate in the Muskegon Country Jail from approximately March 20, 2014, to August 28, 2014.
2. When I arrived at the jail, I was experiencing opiate withdrawal. Jail staff placed me in a small holding cell, roughly the size of a large closet, for about seven days.
3. As many as 18 other women were placed in the cell with me. There was often no room to sit or lie down.
4. I vomited and had diarrhea while I was detoxing in the holding cell. However, I was left in my street clothes, without access to a shower, soap, a towel, a blanket, or a tooth brush for seven days. I had dried vomit in my hair and diarrhea on my clothes. I was not allowed to shower or change.
5. When there was room, I tried to sleep on the floor of the holding cell at night without any mattress or padding. The floor of the holding cell was covered in vomit, spit, urine, and insects.
6. I had several cuts and scrapes that became seriously infected while I was in the holding tank. The wounds remained opened for months. The medical staff told me that the infection was Methicillin-resistant Staphylococcus aureus (MRSA).
7. The toilet in the holding cell is in full view of guards. Male guards were able to see me and all other female inmates using the toilet.
8. After a week in the holding tank, I was moved into a two-person cell the day room. The day room is a central living space with a shower and a guard station. It is surrounded by small two-person cells.
9. I was provided a uniform, but no shoes. Jail staff told me that they were out of shoes. I requested a pair of shoes every day for 2 months. In the meantime, I was forced to walk barefoot on the filthy, cold floor, which often had backed up toilet water or mouse feces on it. After two months the staff gave me a pair of men's size 14 shoes. I am a women's size 6.5.
10. I wore these shoes into the shower, because the floor around the shower was covered in mold and standing water. The oversized shoes caused me to lose my balance and fall. I hit my


face against the ground and chipped a tooth.

11. During my incarceration the showers often shot out scalding hot water. One time, I was badly burnt on my scalp and thigh by extremely hot water.
12. The hot water also burned my open MRSA sores, that I had become infected while I was in the holding cell. I told the jail staff that I could not use the shower because it was further inflaming my wounds. Instead of addressing the plumbing, guards gave me empty soda bottles to collect water in order to bathe.
13. Women in the jail have to collect the water in any containers they can find and let it cool before bathing. Guards mocked us and told us that we were taking "bird baths."
14. The shower and toilets often leaked and left standing water in the cells. The plumbing in the cell blocks leaked hot water constantly for days on end. Many of the drinking fountains do not work. Women, including me, were locked down for hours at a time without any drinking water. We became very thirsty.
15. Toilets were backed up and left the cells smelling of urine and human feces.
16. The jail did not provide inmates with adequate cleaning supplies to deal with overflowing toilets, mold, and mouse feces. Women had to beg for a small cart of cleaning supplies. The cleaning agents were watered down and ineffective.
17. During winter, the cells became extremely cold at night. I have arthritis and it became very painful because the cells were so cold.
18. None of the women I met were given regular opportunities to exercise. During my six month incarceration, I was taken to the jail's gym three times, and then just for short periods while my cell was searched. The only chance that I or other women had to move is by walking around the cells or the day room.
19. The jail has large open space in its basement. This space is commonly referred to as the gym. There are several pieces of workout equipment locked up in the gym. Guards never made this equipment available to me or any of the female inmates I was with while I was incarcerated
20. As a result of lack of exercise, I left the jail with sores and gained about 30 pounds of body fat. When I left the jail, I was in the worst physical shape I have ever been in.
21. Jail staff did not respond to requests by me or by other women for toilet paper, cleaning supplies, or feminine hygiene products.

22. On one occasion, staff ignored my request for pads for 2 days, and I was left to bleed through my uniform.
23. After this incident, the jail also did not provide me clean underwear. I was forced to wash my own, and go without any while it dried.
24. Women, including me, regularly had to go without toilet paper or pads for long periods of time.
25. I was required to wear a one-piece uniform, which meant that when I needed to use the bathroom, I had to take the entire uniform almost completely off, leaving me mostly naked in front of the male guards and trustees.
26. Female inmates, including me, would sometimes try to put up a sheet or a piece of plastic to gain some privacy while changing or using the bathroom. Guards would immediately tear them down. I observed that the guards disciplined women for trying to protect their privacy by moving them into lockdown or taking privileges away.
27. I filled out grievance forms and kites about the terrible conditions in the jail, but never received a response. None of these problems were addressed while I was incarcerated. Jail staff only responded to one grievance.
28. In fact, guards retaliated against me for filing grievances. Once, guards put me in a suicide prevention suit and placed me back in the holding cell for 72 hours to punish me for filing grievances. The suicide suit, which guards called a "Bam Bam" suit, is a heavy smock. When they placed me in it, I had to remove all of my other clothes.
29. One guard told me that I'd "make my life so much easier if I stopped filing these grievances."
30. Guards also refused to provide me grievance forms, or told me to stop complaining and that I just had a "snotty Grand Haven attitude."
31. A number of the guards regularly use racial slurs and refer to female inmates as "bitches."
32. For example, a guard told me, "You're exactly my type, it's a shame you're such a bitch."
33. I heard white guards refer to black female inmates as "niggers" and say things like, "I don't date your kind."

Pursuant to 28 U.S.C. § 1746, I state under penalty of perjury under penalty of perjury that the foregoing is true and correct.

Dated: 11/20/14



Tammy Speers