

EXHIBIT 7

Kitchens Declaration

DECLARATION OF LONDORA KITCHENS

I, Londora Kitchens, declare as follows:

1. I was incarcerated at the Muskegon County Jail from approximately January 23, 2014 until September 2014.
2. When I entered the jail, I spent the first approximately 72 hours of my sentence in a holding tank with approximately 11 other women. The holding tank is a small cell, about the size of a large closet, with benches.
3. While in the holding tank, I slept on the cement floor without even a mat. It was hard to find space on the floor, because there were so many women. I was not given an opportunity to shower during the days I was in the holding tank.
4. Some of the women in the holding tank were detoxing or were ill, and the tank was disgusting. There was one sink in the holding tank, but it was broken. During the three days I was held in the holding tank I was unable even to wash my hands. I also could not get drinking water between meals.
5. In the holding tank there was only one toilet. The toilet was in full view of the guard station. During the 3 days I was held in the holding tank, male guards watched me using the toilet.
6. After spending approximately three days in the holding tank I was moved to the cell blocks. During my incarceration, I was housed in both cells 36 and 37, each time with 11 other women. In these cells male guards could see us showering, changing, and using the toilet from the "cat walk." The cat walk is a walkway that goes past a wall of bars looking into the cells.
7. We hung up a bed sheet by the toilet and shower in an attempt to have some privacy. However, guards told us we were not allowed to have a sheet, and there we did not get any privacy when using the shower.
8. In both cells 36 and 37 the toilets routinely overflowed, flooding our cells with sewage water and urine.
9. On July 13, 2014, I was moved from the cell blocks to the day room. The day room has a common area, designed as living space, surrounded by tiny two-person cells.
10. In the day room the male guards could see me using the toilet through the window in my cell.

One guard told us we were not allowed to put anything on the windows that might give us privacy while using the toilet.

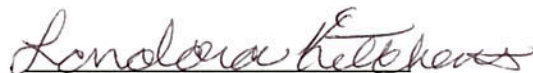
11. Being viewed by others while showering, changing, menstruating, and toileting is humiliating and degrading.
12. My family has a history of diabetes. I am very concerned about my physical fitness and overall health. In particular, I am concerned with developing diabetes. Prior to being incarcerated I had a family membership at the local YMCA. At the YMCA I walked on the treadmill and lifted weights. I also walked in the neighborhood to maintain my health and weight.
13. During my incarceration I gained a significant amount of body fat. I asked at least eight different times to be taken to the jail's gym. In the six months I was incarcerated, I was taken to the gym only four times. On those four occasions the only reason we were taken to the gym was because our cells were being searched.
14. I did everything I could within my tiny cell to maintain my health. I calculated that 212 laps around my cell was roughly 1 mile. I tried to do 212 laps around my cell, but it was very difficult and often impossible because my cell was full of other inmates.
15. The facilities at the jail are disgusting and unsanitary. There is mold in the shower. Since being in the jail my toenails have turned dark. The shower curtain in the day room, which is our only source of privacy while we showered, is falling down. Several other inmates had visible infections that we have been told were Methicillin-resistant Staphylococcus aureus (MRSA), These women lived in the day room and the cell blocks with us and used the same shower., even though MRSA is highly contagious
16. I worked as a trustee in the jail, which means I did a lot of the cleaning. The cleaning solution provided to us appeared to be watered down and did not smell like cleaner. In my experience the cleaner was ineffective. When cleaning, I felt like I am just moving around dirty water and not really getting anything clean.
17. The jail was infested with insects. There were black "sewer bugs" in the shower area and in the basement where I attended classes. I was bitten on multiple occasions by these bugs. The bites hurt, and the areas of the bites swelled and itched.
18. I also contacted a toenail fungus in the jail that turned my toenails black.
19. I requested toilet tissue and sanitary napkins from jail officials on several occasions but my

requests were ignored. For example on July 13, 2014, I was menstruating and was out of sanitary napkins. I filled out a kite requesting more sanitary napkins and did not receive any for over four hours. During this period, Officer Grieves told me that I was “shit out of luck,” and I better not “bleed on the floor.”

20. The day room was over-crowded. Six women were housed, not in cells, but on cots in the day room itself. Inmates housed in cells had to leave their cell doors unlocked so the women who are housed in the day room have access to the toilets in the cells.
21. We were on lockdown, not able to leave our tiny cells for approximately 17 hours a day.
22. On August 11, 2014, I was moved out of a cell in the day room to a bunk in the day room. This meant I had even less privacy than before, but it also meant I was no longer on lockdown the majority of the day.
23. I am African-American. Ivan Morris, a guard at the jail, refers to African-American inmates as “your kind.” I have heard him say, “you’re in a cage like animals in a zoo.”
24. I have filed several grievances about the above issues, but I have not received a response. Guards often refused to provide grievance forms.
25. I understand that I made a mistake in breaking the law. However, nobody deserves to be forced to live like an animal and to be treated like one. We are women deserving of basic respect, sanitary conditions, bodily privacy, and simply to be treated like the women we are. Most inmates here have already been through so much. Being treated so inhumanely makes rehabilitation more difficult.

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: 11-21-14


Londora Kitchens