

EXHIBIT 8

Collins Declaration

DECLARATION OF STASHIA COLLINS

I, Stashia Collins, declare as follows:

1. I am currently an inmate at the Muskegon County Jail serving a 8 month sentence for fraud.
2. I was booked into the jail on August 5, 2014.
3. When I arrived at the jail I spent about four or five days in the holding tank.
4. The holding tank is a tiny cell, about ten feet by fifteen feet. It has concrete benches, a toilet, which is partially covered by a waist-high wall, and a sink.
5. The waist-high wall does not provide sufficient privacy, and male guards and male inmates were able to see me and all other women in the holding tank using the toilet.
6. At times, as many as eighteen other women were placed in the holding tank with me. We were often not able to sit or lay down because there was not enough room.
7. The holding tank does not have beds or mats to sleep on. I had to sleep on a bench or the cold, dirty floor. The floor was covered in dirt and there were insects everywhere.
8. The sink attached the toilet did not work while I was in the holding tank. I was only provided liquid with my meals and was unable to wash my hands.
9. After spending four or five days in the holding tank, I was moved to a two-person cell in the day room. The day room is a common area with tables and a shower. There is a guard station in this room. The common area is surrounded by small cells. The small cells contain a toilet and two bunks.
10. Male guards are able to look into my cell when I am changing or using the toilet through a window. I have tried to put up sheets to cover this window while I am using the toilet, in order to have a small amount of privacy. When I try to do this, guards, including a guard named Officer DeYoung, tear the sheets down and reprimand me. Guards have punished me

for attempting to protect my privacy by putting me on lockdown. I have seen them do the same thing to other women in the jail.

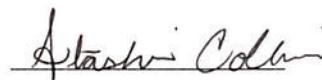
11. At some point, I was moved from the day room to the larger 12-woman cells in an area known as the cell blocks. The cell blocks are 12-woman cells off a cat walk. The cells in the cell blocks each contain a toilet and a shower. One wall of the cell blocks is made of bars. Male guards walking past this wall are able to see me and other women using the toilet and undressing before entering the shower.
12. The shower in the cell blocks is covered in mold. We are not provided with adequate cleaning supplies to keep our cell clean and hygienic. The jail is also full of insects and vermin.
13. The shower also shoots out scalding hot water. Women in the jail have to collect the hot water in containers and let it cool before bathing.
14. Guards do not respond to requests for toilet paper, tissue, or feminine hygiene products. On one occasion, during the week of November 21, 2014, I asked a guard named Ivan Morris for feminine hygiene products first thing in the morning, around 6:00 AM. Mr. Morris ignored my repeated requests, and I was not provided pads until 5:00 PM that day. By then, I had bled into my clothing. I was not provided with clean clothing for hours. I have seen other women who were refused pads bleed through their clothes as well.
15. The jail has a large area on the first floor that is used as a gym. I have been incarcerated for five months, and I have only been taken to the gym once. The gym contains exercise equipment, which is kept locked up. Guards do not allow women to use this equipment.
16. I am usually locked down in my cell for most of the day every day. The only opportunity I have to exercise is to move around my cell. I have gained weight and lost muscle mass since

my incarceration, and I am worried that I will leave the jail in poor health because I am not able to exercise.

17. The jail is also incredibly cold during the winter. When guards take away women's blankets as punishment, or when we are without them during laundry day, we are left in the freezing cold cells in only our thin jumpsuits for hours or even days.
18. I am African-American. Guards use racist and sexist language regularly. Guard Ivan Morris uses the word "nigger" in front of me and other African-American inmates.
19. Guards ignore verbal requests and kites about the above issues. I have filed grievances about mistreatment by guards, lack of toiletries, lack of cleaning supplies, cross-gender viewing, and other issues. Staff have not responded to many of the issues, and when they have responded they have told me there is nothing they can do to fix the problem.

Pursuant to 28 U.S.C. § 1746, I state under penalty of perjury under the laws of the United States that the above statements are true and correct to the best of my knowledge, information, and belief.

Dated: 11/21/14



Stashia Collins