

**EXHIBIT 3**

Vos Declaration

## DECLARATION OF DENISE VOS

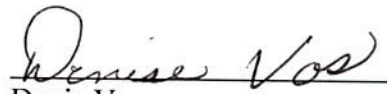
I, Denise Vos, declare as follows:

1. I was an inmate in the Muskegon County Jail from June of 2011 until February of 2012, as well as on prior occasions.
2. I spent several hours in the holding tank when I arrived. The holding tank is where inmates are held while they are being processed into the jail. It has benches and a toilet, but no bed or shower.
3. The jail contains a few holding tanks, but in my experience, the guards always use a very small cell to hold the women. I would estimate that the holding tank was no larger than ten feet by twelve feet.
4. The holding tank was full of trash and bugs, and it was overcrowded with other inmates.
5. The toilet in the holding tank was partially covered by a half-sized wall. Male guards watched women, including me, using that toilet.
6. The water fountain in the holding tank was not working. I and other women were only provided drinking water with their meals.
7. I spent part of my incarceration in the 12-woman cell, part in a 6-woman cell, and another part in the day room surrounded by two-person cells.
8. The 12-woman cell contained a shower and a toilet. At times the cell actually contained 14 women due to overcrowding. The extra women were forced to sleep on the ground.
9. During the winter the cells became incredibly cold, especially at night. Women, including me, had to sleep on small mats on the freezing cold floor. Sometimes guards confiscated my and other women's blankets as punishment.
10. The day room was a central area surrounded by small cells. Each of the small cells contained a toilet. There was a shower area next to a guard station on one side of the day room.
11. Male guards in the day room could see me using the toilet, showering, dressing, and undressing.
12. When I used the toilet, I had to take off my one piece uniform and expose my entire naked body. When I tried to protect my privacy by placing a small piece of toilet paper over the window of the cell, male guards would open the cell door, rip the toilet paper off the window,

- and slam the door behind them. This happened repeatedly.
13. Once, when I was using the toilet, a guard named David Gutowski began passing out things to inmates while I was sitting on the toilet, naked, in front of him.
  14. Male guard and male inmate trustees would routinely walk by the cells and look in to see women, including me, using the bathroom, undressing, or showering.
  15. In all of the different cells I was in, the plumbing was constantly broken. The shower in the day room leaked and left pools of water on the floor. I often had to step into an ankle deep pool of standing water in order to take a shower.
  16. Every single shower in the jail that I ever used was covered in dark mold.
  17. During my incarceration, I saw part of the ceiling in the day room crumbling and falling on inmates.
  18. We were almost always locked in our cells for twenty-four hours a day, seven days a week, with no chance to exercise. I was only taken to the gym two or three times during the entire eight-nine months of my incarceration, and then only when my cell was being shaken down. When I asked to go to the gym, guards told that they did not have the time or staff, or that the men were already using the gym.
  19. When women, including myself, asked for toilet paper, we were often ignored for hours or days.
  20. Guards also ignored women's requests for feminine hygiene products. I observed women who were menstruating bled on their clothes, and they were not provided clean clothes until the next laundry day.

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: 11-25-14

  
Denise Vos