

April 12, 2012

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VIA FIRST CLASS MAIL, EMAIL AND FACSIMILE

Re: Ending the Routine Use of Sexually Abusive and Unnecessary Spread-Labia Vaginal Searches of Women Prisoners

Dear Mr. Heyns:

We represent a broad array of civil rights, human rights, health, and religious organizations united in our dedication to stopping the sexual humiliation of women prisoners. We write to demand a decisive end to a degrading type of visual body cavity search practiced at the Women's Huron Valley Correctional Facility (WHV), the only women's prison in the State of Michigan. While an investigation by the American Civil Liberties Union (ACLU) has caused a partial, and likely temporary, modification of the search procedure, we urge you to revise Policy Directive 04.04.110 to explicitly and permanently ban the practice.

The Spread-Labia Vaginal Search and Its Effect on Women Prisoners

When being subjected to the spread-labia vaginal search, women prisoners are forced to remove all of their clothing, sit on a chair, lift their legs into the air, and use their hands to spread open their vaginas as a prison guard peers into their vaginal cavities. Sometimes multiple women are forced to undergo this humiliating search in view of one another. If a woman objects to the search, she can be forced to submit through physical force or punished with solitary confinement.

These searches occur routinely, including after each contact visit, even when guards have no reason to suspect that a particular woman is carrying contraband in her body. Consequently, women who wish to speak with an attorney or religious worker, or have contact visits with their children or other family members, are forced to submit to this sexual humiliation after each visit. These searches also occur after women's shifts in prison jobs, after women receive medical care, and at other times. On one occasion, four kitchen workers were subjected to spread-labia vaginal searches in full view of one another because a guard believed that some chicken might have been stolen from the

kitchen. No exceptions are made for women who are menstruating, pregnant, ill, or have been sexually abused, whether prior to or during their incarceration.

In addition, measures to assure sanitation during these invasive searches are often incomplete or ignored entirely, resulting in women being exposed to the menstrual blood or other bodily fluids of other prisoners when they sit on the chair, including those suffering from serious communicable conditions such as HIV and hepatitis. A disposable liner for use on the chair is rarely if ever provided, and women are seldom permitted to sanitize the chair or wash their hands after the search. At least one woman has suffered a vaginal infection which she believes was contracted during a spread-labia vaginal search.

A woman prisoner described the search as follows in a letter to the ACLU:

They place you in a chair. You are completely naked. I had the officer then tell me, "spread your pussy lips." Then I had one tell me to put my heels on the chair and use my hands to open my lips. ... I feel like I'm being prostituted by these officers ... I am an abused woman, and every time this happens I feel completely lost again.

Another woman wrote:

[A]fter a visit with my brother, I was [] searched in the chair by [a guard], who ordered me to get completely naked, sit on the edge of the chair, open my legs wide, touch myself and open the lips of my vagina. No lining paper or sanitizer were provided. ... I looked at the chair and saw spots from other prisoners' bodies. I could not seat my naked body on these spots, my stomach turned and I became nauseated. In order to comply with [the guard]'s order, I had to place my shirt on the chair, the shirt that I wore back to my housing unit after the strip search, before I sat down butt naked, with disgust. ... After the [] search was completed, there was no soap available at the sink to wash my hands, after I touched myself. I have not had a visit with my brother in a long time to avoid this torturing procedure. I become literally sick before and after each visit. ... Additionally, I am Muslim, and the Muslim religion prohibits women from exposing themselves in any manner or shape, especially in the manner I was being ordered to do so. This procedure violates my religion.

And another:

Because I am a survivor of domestic abuse, this [] search incident has caused me extreme emotional distress and has resulted in flashbacks of the abuse that I endured in my thirty-year marriage to an abusive spouse. When the Officer, a person of authority, ordered me to pose naked in a degrading and humiliating way that I viewed as sexual in nature, I was powerless to refuse; and, I experienced the same feelings of shame, helplessness, and vulnerability that I experienced while being victimized

by my abusive husband. Now, just the thought of a visit causes me to have anxiety attacks for the [] search that I know awaits me and it dredges up those memories of past abuse that I am working so hard to forget.

Any student of history knows that using one's position of authority to force another person to strip completely naked and pose in a degrading manner in their presence is a technique used to humiliate, degrade, and strip away a person's last vestige of dignity. It is the ultimate form of control, domination, and humiliation designed to break an individual

And another woman, who was subjected to a group search:

There are no words in the human vocabulary that can express how I felt as I was forced to strip down butt naked in front of other women. . . . I [saw] naked bodies that I didn't want to see, and I felt as if I was being raped all over again, like I had been raped in the streets. It broke my self-esteem down so low because I have these ugly scars all over my body from the beatings that I suffered in the streets from different men when I was getting high off of drugs. But this time I had to face the abuse sober I realize that we have very little privacy once we become inmates, but we are still human beings and we still have rights.

The Spread-Labia Vaginal Search Defeats Rehabilitation While Serving No Security Purpose

Among departments of corrections across the country, Michigan is alone in routinely subjecting women prisoners to the seated, spread-labia vaginal search. Elsewhere, prisoners leaving a contact visit or work duty undergo a strip search wherein they bend forward at the waist to expose their vagina and anus, spreading their buttocks cheeks to permit inspection, and/or squat and cough to dislodge any concealed contraband. While such standard strip searches are invasive, they are far less traumatizing to women prisoners than the spread-labia vaginal search because they do not require women to handle their own genitals, nor remain face-to-face with a guard while exposing themselves, nor suffer a danger of infection by sitting in a chair used by other naked prisoners.

Michigan's women prisoners are forced to undergo both of the standard strip searches, and in addition to perform the spread-labia vaginal display. The spread-labia search confers no added increment of security, because although it is more degrading, it is no more thorough than a strip search. Manual exposure reveals only the entrance of the vagina and therefore cannot expose contraband concealed higher in the vaginal cavity. The addition of the degrading vaginal search to the standard search therefore serves no conceivable institutional interest. As a means of discovering concealed contraband, the

spread-labia search is also ineffective for another reason: the source of most illicit drugs available in prison is not prisoners, but prison staff.¹

Given the ineffectiveness of the spread-labia vaginal search, it is unsurprising that the Department of Corrections (DOC) has failed to articulate any need for this procedure, despite being given numerous opportunities to do so. In response to requests by the ACLU, the DOC admitted that it has no records documenting any security or other need that would justify such an extreme intrusion. Moreover, the peculiar search carried out in WHV has produced no results. When asked repeatedly by the ACLU for Contraband Recovery Records that, according to written policy, must be filed each time contraband is discovered on a prisoner's body, the DOC produced none. Instead, the DOC claimed – utterly implausibly – that no such records are maintained. The DOC has thus failed to show that the standard strip search procedure is inadequate to maintain institutional security, nor that the spread-labia vaginal search springs from any real need or has yielded any results.

Although the spread-labia search has no benefits, it extracts a terrible cost. Women subjected to the search report feeling overwhelmingly humiliated, degraded, and devastated. They describe the search as revolting, stomach-turning, pornographic, voyeuristic, and assaultive, and report feeling as if they have been raped, or subjected to physical or mental torture. In the aftermath of a search, one woman reported feeling “powerless, ashamed, and worthless.” Some women have foregone visits with their loved ones because they simply cannot tolerate the abusive search. Forcing women to submit to a traumatic and invasive search as the price of holding their children is unconscionable.

These personal costs, in turn, undermine the institutional goal of rehabilitating women and reducing recidivism. Humiliating body searches exacerbate trauma and mental illnesses, making reentry into society more difficult, and thus recidivism more likely.² The damage done to women prisoners is especially pronounced because “[a]pproximately eighty percent of women behind bars have been the victims of domestic violence,”³ and over half have been physically or sexually abused.⁴ Rehabilitation is further undercut as women forego visits with family, clergy, and others to avoid the spread-labia vaginal search. Time after time, “studies have shown that family contact during incarceration is

¹ In its extensive 1995 investigation of conditions in Michigan's women's prisons, the United States Department of Justice concluded, in light of the evidence it had collected, that the source of drugs in the prisons was correctional staff, not prisoners. Letter from Deval L. Patrick, Assistant Attorney General, Civil Rights Division, Department of Justice, to John Engler, Governor, State of Michigan (March 27, 1995) [hereinafter “DOJ Findings Letter”]. This finding is consistent with common sense – the staff and video surveillance attending prisoner contact visits, and the near total ban on physical contact between prisoners and visitors, make passing contraband extremely difficult. Moreover, even if contraband changes hands, the size of the vaginal cavity limits the potential volume of contraband to a small amount.

² See TERRY KUPERS, M.D., PRISON MADNESS: THE MENTAL HEALTH CRISIS BEHIND BARS AND WHAT WE MUST DO ABOUT IT 135 (1999) (stating that humiliating treatment of women in prison can worsen mental illness and make reentry more difficult).

³ *Id.* at 114.

⁴ DORIS J. JAMES, BUREAU OF JUSTICE STATISTICS, U.S. DEPARTMENT OF JUSTICE, PROFILE OF JAIL INMATES 2002, available at <http://bjs.ojp.usdoj.gov/content/pub/pdf/pji02.pdf>.

associated with lower recidivism rates.”⁵ In short, asking women to achieve rehabilitation in prison, while inflicting needless degradation and suffering that actually undermines their rehabilitation, is senseless, sadistic, and self-defeating.

The Routine Use of the Spread-Labia Vaginal Search Is Unconstitutional and Violates Human Rights Norms

The spread-labia search is not only a policy failure, but a legal one as well, raising grave concerns under the Fourth and Eighth Amendments to the United States Constitution. While visual inspections of prisoners’ bodies have been ruled legally permissible under certain circumstances, in this case, the requirement that prisoners hold open their vaginas for inspection on a routine basis and without reasonable suspicion – when considered in conjunction with the standard strip search already designed to uncover contraband – becomes so gratuitous as to constitute unnecessary and wanton infliction of suffering.⁶ Moreover, courts have acknowledged that the sexual abuse histories of many women prisoners adds to the trauma caused by invasive strip searches and heightens constitutional concerns.⁷ Forcing women to undergo the search after visits with lawyers and religious workers raises additional concerns relating to access to legal representation and the courts, and the exercise of religious freedoms.⁸

The enhanced strip search also conflicts with international human rights standards.⁹ International norms require that body searches be “carried out in a manner consistent

⁵ Nancy G. La Vinge, et al., *Examining the Effect of Incarceration and In-Prison Family Contact on Prisoners’ Family Relationships*, 21 J. CONTEMP. CRIM. JUST. 314, 316 (2005) (citations omitted); see also Rebecca L. Naser & Christy A. Visher, *Family Members’ Experiences with Incarceration and Reentry*, 7 W. CRIMINOLOGY REV. 20, 21 (2006) (“[A] remarkably consistent association has been found between family contact during incarceration and lower recidivism rates.”) (citations omitted). Family contact is also associated with better behavior during incarceration. “Inmates who maintain family ties are less likely to accept norms and behavior patterns of hardened criminals and become part of a prison subculture.” Shirley R. Klein et al., *Inmate Family Functioning*, 46 INT’L J. OFFENDER THERAPY & COMP. CRIMINOLOGY 95, 99 (2002) (citations omitted).

⁶ See *Whitley v. Albers*, 475 U.S. 312 (1986) (“unnecessary and wanton” infliction of pain on prisoners violates Eighth Amendment); *Jordan v. Gardner*, 986 F.2d 1521, 1526-29 (9th Cir. 1993) (even clothed searches of female prisoners by male guards rises to the level of unnecessary and wanton infliction of pain); *Way v. County of Ventura*, 445 F.3d 1157, 1159 (9th Cir. 2006) (search in which jail detainee arrested on drug charges was forced to “spread her labia ... to allow a check of the vaginal area” required reasonable suspicion).

⁷ *Jordan*, 986 F.2d at 1525-26; see also *Everson v. Mich. Dep’t of Corrections*, 222 F. Supp. 2d 864, 885 (E.D. Mich. 2002) (citing testimony regarding abuse faced by women prisoners), *rev’d on other grounds*, 391 F.3d 737 (6th Cir. 2004).

⁸ See *Wood v. Hancock County*, 245 F. Supp. 2d 231, 239 (D. Me. 2003) (finding insufficient evidence of a security need for strip searches after visits, “let alone” after “visits with attorneys”).

⁹ International Covenant on Civil and Political Rights (ICCPR) art. 7, Dec. 16, 1966, 1966 U.S.T. Lexis 521, 999 U.N.T.S. 171 (“No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.”); art. 10(1) (“All persons deprived of their liberty shall be treated with humanity and with respect for the inherent dignity of the human person.”); Convention Against Torture and Cruel, Inhuman, or Degrading Treatment or Punishment (CAT), Dec. 10, 1984, S. Treaty Doc. No. 100-20(1988), 1465 U.N.S.T. 85. (prohibiting both torture by public officials and other treatment, falling short of torture, which is cruel, inhuman or degrading). Over a decade ago, the United States ratified the ICCPR and the CAT. The use of torture and other cruel, inhuman, or degrading treatment also violates customary international law.

with the dignity of the person who is being searched.”¹⁰ In particular, the systematic use of the spread-labia vaginal search where there is no individualized reason to suspect that a woman is carrying contraband renders it an excessive and disproportionate intrusion into human privacy and dignity.¹¹ Human rights standards dictate that, even under circumstances justifying a body search, such searches cannot be performed in a demeaning manner, such as by forcing prisoners to assume positions they find degrading.¹² The United Nations Committee Against Torture has specifically found that “inspections of female private parts can constitute cruel or degrading treatment,”¹³ and the Inter-American Commission on Human Rights has declared that, to be lawful, a body search must meet a multi-part test under which the search “must be absolutely necessary to achieve the security objective,” and can only be used where there is no viable alternative.¹⁴ The spread-labia vaginal search fails to meet any of these internationally accepted standards.

Efforts to End the Search and Prison Officials’ Evasive Response

The women confined in WHV and their advocates have for years attempted to reach a resolution with prison authorities that would end the spread-labia vaginal search. The response of prison administrators has been to ignore, rebuff, and evade those appeals, and when pressed, to rewrite prison rules in a post hoc effort to justify their actions and evade further scrutiny. Dozens of women have lodged formal grievances detailing the degrading and unhygienic nature of the search. Some of those who grieved have suffered retaliation and harassment, and many others have remained silent for fear of retribution. Even the efforts of a non-governmental organization and private attorneys to resolve the matter failed in the face of prison officials’ apparent devotion to the degrading spread-labia search.

See, e.g., RESTATEMENT (THIRD) OF THE FOREIGN RELATIONS LAW OF THE UNITED STATES §§ 331 cmt. e; 702(d) cmt. n (1987).

¹⁰ U.N. Human Rights Committee, CCPR General Comment No. 16: Article 17 (Right to Privacy), The Right to Respect of Privacy, Family, Home and Correspondence, and Protection of Honour and Reputation (Apr. 8, 1988), <http://www.unhcr.org/refworld/docid/453883f922.html>.

¹¹ *See, e.g.,* *Lorse v. the Netherlands*, no. 52750/99, Eur. Ct. H.R. para. 67, 73-74 (2003) *available at* <http://cmiskp.echr.coe.int/tkp197/view.asp?item=1&portal=hbkm&action=html&highlight=lorse&sessionid=85533496&skin=hudoc-en>. Systematic strip-searching diminished human dignity, gave rise to feelings of anguish, and was capable of humiliating and debasing a prisoner. In combination with other security measures, it amounted to inhuman or degrading treatment in violation of international law.); *Van Der Ven v. The Netherlands*, no. 50901/99, 2003-II Eur. Ct. H.R. paras. 61, 67; Comm. Against Torture, Consideration of Rep. Submitted by States Parties under Art. 19 of the Convention: Concluding Observations of the Comm. Against Torture. Hong Kong Special Administrative Region. U.N. Doc. CAT/C/HKG/CO/4 (Jan. 19, 2009) (condemning the routine strip searching of persons entering police custody, and requiring that such searches occur only “where there is a reasonable and clear justification,” and “with the least intrusive means and in full conformity” with CAT).

¹² *Valašinas v. Lithuania*, no. 44558/98, 2001-VIII Eur. Ct. H.R. para. 117; *Van Der Ven v. the Netherlands*, no. 50901/99, 2003-II Eur. Ct. H.R. paras. 58, 61, 67.

¹³ Comm. Against Torture, Consideration of Rep. Submitted by States Parties under Art. 19 of the Convention: Concluding Observations of the Comm. Against Torture. Honduras, para. 22, U.N. Doc. CAT/C/HND/CO/1 (June 23, 2009).

¹⁴ *X & Y v. Argentina*, Case 10.506, Inter-Am. Comm’n H.R., Report No. 38/96, para. 72 (1996).

This official intransigence is especially troubling in light of the long history – extending to the present day – of sexual abuse, harassment, and humiliation in Michigan’s women’s prisons. The targeting of women prisoners in Michigan for sexual abuse, often with official knowledge and complicity, has been widespread, incontrovertibly documented, and judicially acknowledged to an extent surpassing every other state in the country.¹⁵ In 1995, the federal Department of Justice found abuse by both male and female guards against women prisoners within a universally coercive and fear-pervaded prison environment.¹⁶ Ubiquitous abusive acts by staff ranged from rape to sexually abusive pat-down searches and some forms of sexual degradation involving no touching at all.¹⁷ In addition to the Justice Department, the Michigan Women’s Coalition, Human Rights Watch, and the United Nations Commission on Human Rights all substantiated sexual abuse against women prisoners in Michigan, including the abusive use of body searches.¹⁸

Women prisoners’ claims of a pervasively sexualized and abusive environment have also been proven in court. The 1996 case, *Nunn v. Michigan Department of Corrections*, in which women prisoners alleged rampant sexual misconduct, privacy violations, and retaliation, ended in an almost four million dollar settlement.¹⁹ In 1997, the Justice Department filed suit challenging sexual misconduct and other abusive conditions; that case settled two years later. Most recently, systemic sexual harassment and abuse going as far back as 1991 and involving a third of prison guards was proven to the satisfaction of two juries in the massive class action lawsuit *Neal v. Michigan Department of Corrections*.²⁰ The resulting 2009 settlement cost Michigan taxpayers over one hundred million dollars.

In light of this history, as well as the fact that the search procedure serves no practical end, it is hardly surprising that the women prisoners experience the search as little more than an officially sanctioned form of sexual humiliation.²¹ That this degradation is officially

¹⁵ In *Everson v. Mich. Dept. of Corrections*, a court found “The problem of sexual abuse and other mistreatment of female inmates has long plagued the MDOC.” 391 F.3d 737, 741 (6th Cir. 2004).

¹⁶ DOJ Findings Letter, *supra* note 1.

¹⁷ With no legitimate purpose, officers were found to watch prisoners dress and undress, shower, and use the toilet. Another abusive practice involving no touching was the urinalysis procedure, whereby women were forced to stand naked and urinate into a cup while “an officer bends down in front of the prisoner, placing her face only inches from the crotch area.” DOJ Findings Letter, *supra* note 1, at 4.

¹⁸ See *Everson*, 391 F.3d 737 at 741; HUMAN RIGHTS WATCH, ALL TOO FAMILIAR: SEXUAL ABUSE OF WOMEN IN U.S. STATE PRISONS 224-80 (1996); Special Rapporteur on Violence Against Women, *Report of the Mission to the United States of America on the Issue of Violence Against Women in State and Federal Prisons*, 145-51, U.N. Doc. E/CN.4/1999/68/Add.2 (Jan. 4, 1999). Human Rights Watch concluded that “rape, sexual assault or abuse, criminal sexual contact, and other misconduct by corrections staff are continuing and serious problems within the women’s prisons in Michigan [and] have been tolerated over the years at both the institutional and departmental levels.” HUMAN RIGHTS WATCH, *supra*, at 323.

¹⁹ *Nunn v. Mich. Dept. of Corrections*, No. 96-CV-71416-DT (E. Dist. Mich. dismissed following settlement on Apr. 25, 2007).

²⁰ *Neal v. Mich. Dept. of Corrections*, No. 96-006986, slip op. (Mich. Ct. App. Jan. 27, 2009).

²¹ Sexual abuse need not involve physical contact; rather, it is an act of power, aggression and control involving a sexual element. The United States Centers for Disease Control and Prevention define non-contact sexual abuse as follows: “Non-contact sexual abuse does not include physical contact of a sexual nature between the perpetrator and the victim. It includes acts such as voyeurism; intentional exposure of

endorsed by prison officials is evident from officials' adoption, codification, and relentless defense of the search procedure. In June 2011, faced with overwhelming opposition to the spread-labia vaginal search – some of which argued that the search was nowhere specified in prison operating procedure – WHV Warden Millicent Warren simply rewrote the operating procedure, adding to it that “a prisoner may be required to manually spread the lips of her vagina with her hands.”²² Having changed the rules to suit their desires, prison officials proceeded to reject prisoner grievances based on this new language.

The rules were changed again when, facing an ACLU investigation, Warden Warren circulated a notice to some, but not all, prison staff purporting to change the institution's operating procedure back to its original language. The warden's memo states that guards are “no longer authorized” to require women to sit in a chair and manually spread their vaginal lips.²³ Subsequently, women are still being forced to spread open their vaginal lips with their hands, often with no soap or sanitizer provided, although they are not now being required to be seated during the search. The memo has therefore had little practical effect. As a legal matter, moreover, the memo does not, and could not, change the prison's operating procedure nor the DOC's policy directive, which require each woman to “spread the lips of her vagina, to allow inspection.”²⁴ Indeed, even if the warden's muddled instructions were to effectuate a temporary cessation of the intrusive search, the change undoubtedly comes in response to public scrutiny, and could easily be reversed as soon as the spotlight is turned off. As Warden Warren has amply demonstrated, she can at any moment issue a memorandum changing purported institutional procedure at will.

We, the undersigned organizations and individuals, demand a definitive end to the sexually abusive spread-labia vaginal search. To ensure that this despicable practice does not recur, the Michigan Department of Corrections must amend its department-wide search rule – namely Policy Directive 04.04.110 – to prohibit prison officials from

an individual to exhibitionism; unwanted exposure to pornography; verbal or behavioral sexual harassment; threats of sexual violence to accomplish some other end; or taking nude photographs of a sexual nature of another person without his or her consent or knowledge, or of a person who is unable to consent or refuse.” Centers for Disease Control and Prevention, *Sexual Violence: Definitions*,

<http://www.cdc.gov/violenceprevention/sexualviolence/definitions.html>. Similarly, the Supreme Court of Canada held that the essence of a sexual assault is conduct that violates the sexual integrity or dignity of the complainant, and need not involve sexual contact, or even sexual gratification on the part of the officer. *R. v. Chase*, [1987] 2 S.C.R. 293 (Can.). *See also* *R. v. Golden*, [2001] 3 S.C.R. 679 (Can.) (sexual abuse occurs when a person's sexual integrity is infringed); Paul R. Schuldiner, *Visual Rape: A Look at the Dubious Legality of Strip Searches*, 13 J. MARSHALL L.R. 273 (1980); Amanda George, *Strip Searches: Sexual Assault by the State*, in *WITHOUT CONSENT: CONFRONTING ADULT SEXUAL VIOLENCE*, Patricia Weiser Easteal (ed., 1993).

²² Memorandum from Millicent Warren, Warden, Women's Huron Valley Correctional Facility, to All Concerned (June 3, 2011) (on file with the ACLU).

²³ Notice to Staff from Millicent Warren, Warden, Women's Huron Valley Correctional Facility, (Dec. 13, 2011) (on file with the ACLU).

²⁴ Mich. Dep't of Corrections WHV - Women's Huron Valley Correctional Facility Operating Procedure 04.04.110, at 3 (on file with the ACLU); Mich. Dep't. of Corrections Policy Directive 04.04.110, at 2 available at http://www.michigan.gov/documents/corrections/04_04_110_337349_7.pdf; *Jordan v. Pugh*, 504 F.Supp.2d 1109, 1118 & nn.21-23 (D. Colo. 2007) (Officials' memorandum purporting to modify policy cannot change or replace the unequivocal language of the policy.).

forcing women to manually spread their vaginal labia and from requiring women to be seated during body searches. The revised policy may exempt from this ban cases where there exists individualized suspicion of concealed contraband, but should provide that, in such cases, the search is to be carried out by medical personnel. Such a reform, imposed from outside the walls of the women's prison, is essential to protect prisoners from future abuse of power by prison officials.

Sincerely,

American Civil Liberties Union
American Civil Liberties Union of Michigan
American Friends Service Committee – MI Criminal Justice Program
American University, Washington College of Law, Project on Addressing Prison Rape
Center for Civil Justice
Chicago Legal Advocacy for Incarcerated Mothers
Citizens Alliance on Prisons and Public Spending
Crossroad Bible Institute
Destiny and Purpose Community Outreach
The Elephant Circle
Grassroots Leadership
Hope 4 Healing Hearts, Inc.
Just Detention International
Justice Now
Law Students for Reproductive Justice
League of Women Voters of Michigan
Legal Services for Prisoners with Children
Metro-Detroit Chapter of the Coalition of Labor Union Women (CLUW)
Michigan CURE
Michigan State University College of Law Civil Rights Clinic
Michigan Women's Justice & Clemency Project
MindFreedom International
National Latina Institute for Reproductive Health
Nokomis Foundation
Our Bodies Ourselves
Rabbis for Human Rights – North America
State Bar of Michigan Prisons & Corrections Section
United Methodist Church, General Board of Church and Society
Urban Justice Center
Women On the Rise Telling HerStory (WORTH)
Devika Baldeo, Sister Inside Specialist, Women On the Rise Telling HerStory – WORTH
Erika Lorraine Davis, Butler Davis, PLLC
Hope Metcalf, Lecturer, Yale Law School
Tim Johnson, Department Chair, University of Michigan Department of Obstetrics and Gynecology
Daniel Manville, Associate Clinical Professor, Civil Rights Clinic, Michigan State University College of Law

Sheryl Kubiak, Michigan State University School of Social Work

Cc: Rick Snyder, Governor, State of Michigan

Jonathan M. Smith, Chief, Special Litigation Section, Civil Rights Division,
United States Department of Justice

Rashida Manjoo, United Nations Special Rapporteur on Violence Against Women

Juan Méndez, United Nations Special Rapporteur on Torture and Other Cruel,
Inhuman or Degrading Treatment or Punishment