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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

DECLARATION OF

AMANDA DAVIS, et al.,)
)
 Plaintiffs)
)
 vs.)
)
 CANYON COUNTY, IDAHO, et al.,)
)
 Defendants)
 _____)

Case No. 1:09-CV-00107-BLW

DECLARATION OF
AMANDA DAVIS

I, Amanda Davis, hereby declare under penalty of perjury pursuant to 28 U.S.C. §
1746, the following:

1. I am twenty-two (22) years old. I am currently incarcerated in the Canyon County Jail in Caldwell, Idaho (hereinafter, "Jail").

2. I first entered the Jail on June 14, 2008. On July 18, 2008, I was placed in L Pod. All beds were already occupied in L Pod and a guard instructed me to sleep on the floor. I was issued one thin mattress. I was approximately 4 ½ months pregnant at the time. I remained on the floor in L Pod for six days when I was moved to H Pod. There was no unoccupied bed in H Pod either, and I was again instructed by a guard to sleep on the floor. I remained on the floor for nearly two weeks in H Pod.

3. It was extremely uncomfortable and painful sleeping on the floor and it hurt my back and my hips. I had bruises on my hips. Prolonged sleep was impossible and I woke up every two or three hours. I asked guards if they would allow me to have a second mattress and they said I could have one only if the medical department authorized it, so I asked the medical department if I could be issued a second mattress. They refused to authorize me to have a second mattress, even though the Jail had many extra mattresses.

4. Finally in August 2008, I was issued a bed in Cell 5 of H Pod. However, due to overcrowding, a female prisoner was placed on the floor in that Cell, and she stayed on the floor for nearly three weeks.

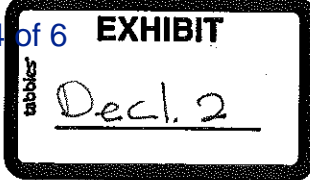
5. I am asthmatic. The mold and filth in my housing unit is having a very harmful effect on my health. I have coughing spells, a runny nose, sneezing, and headaches that I attribute to the unsanitary conditions in the Jail, especially the mold. I have made many requests to Jail staff that they clean and sanitize the living area but nothing is being done.

6. While I was being escorted to the medical department on February 9, 2009, Deputy Riley told me that "jail is not here to make prisoners comfortable but to make them not want to come back." I believe Deputy Riley made this comment to explain why the conditions are so inadequate at the jail.

Dated this _____ day of _____, 2009.

Amanda Davis

[Note: The original of this document has been sent to Ms. Davis for her signature and will be filed with the Court as soon as it is received by counsel for Plaintiffs.]



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DECLARATION OF
ALISHA BAKER

I, Alisha Baker, hereby declare under penalty of perjury pursuant to 28 U.S.C. §
1746, the following:

1. I am currently incarcerated in the Canyon County Jail in Caldwell, Idaho (hereinafter, "Jail").

2. I entered the Jail in early November 2008 and I have been here ever since. In January 2009, I was found guilty of violating rules that are not posted anyplace, and no copy of any Jail rules have ever been given to me. Nor have I ever seen any schedule of punishments that prisoners can receive for violating any of these unpublished rules. I have asked deputies for a copy of the Jail rules but none was provided.

3. When I was convicted of violating unannounced rules, I was sent to segregation. I spent nearly two months in segregation. While there, I repeatedly requested access to the outdoor recreation yard. All my requests were denied. I was told that prisoners in segregation will not be allowed access to the outdoor recreation yard.

4. The Jail has no indoor recreation area or any exercise equipment, either indoor or outdoor. When not incarcerated, I regularly exercise three to five times a week. The lack of opportunities to exercise in the Jail has caused a significant deterioration in my physical and mental health. Combined with the horribly unsanitary conditions of the Jail, the inadequate ventilation, the putrid smell, and the stuffy air, I feel dizzy and drowsy, more depressed than I believe I would otherwise be, and frequently get headaches.

5. Sanitation in the Jail is awful. There is mold everywhere and it is dirty. Most deputies apparently have no desire to ensure that living conditions are tolerable, clean, or healthy. Sanitation in the segregation unit (J Pod) was particularly terrible. The drain in my area was clogged the entire time I was there, and there was a putrid smell coming from it. Deputies only occasionally brought me cleaning supplies, and refused most of my requests for sanitizing agents so that I could try and keep the area clean.

6. I believe that part of the reason I have been subjected to discipline by deputies is because I have frequently written to the ACLU. Recently when I asked a deputy why I was being disciplined rather harshly and targeted for cell searches, the deputy suggested that it was because "you went ahead and joined the ACLU bandwagon." The only thing I have tried to do is improve the living conditions in this Jail for me and other prisoners.

Dated this _____ day of _____, 2009.

Alisha Baker

[Note: The original of this document has been sent to Ms. Baker for her signature and will be filed with the Court as soon as it is received by counsel for Plaintiffs.]