

MIDDLE DISTRICT OF LOUISIANA

January February March April May June July August September October November December
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

UNITED STATES DISTRICT COURT

Alex A. b-1 and through
his guardian Mollie Smith,
et al.

v.

Governor John Bel Edwards
in his official capacity, et al.

3:22-cv-573

I, [REDACTED], hereby declare the following
to be true under penalty of perjury:

① I am 15 years-old and making this declaration
of my own free will. Everything in this
declaration is true to the best of my
personal knowledge.

② I normally reside in Orleans Parish with
my grand mother Angela Williams. I live
with ~~my~~ Germond Turner, my older brother,
at my grand mother's house. We all live
together in the East.

③ I am currently in OJJ custody.
My full term date is 2028.

④ I was taken into OJJ custody
on approximately April 12 or 13, 2022.

January February March April May June July August September October November December
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

⑤ I am presently housed at OTJ's West Feliciana Campus at Angola. I got moved here in either September or October 2022.

⑥ I am currently in B-Pod. I have been in B-Pod for about a month. Before B-Pod, I was in A-Pod. I was in A-Pod about a month and a half. The main difference between them is that we get snacks twice a day in B pod - we only got one snack a day in A pod - and sometimes we can play the X-Box in B-Pod.

⑦ Before being moved to Angola, I was first put in Bridge City in Jefferson Parish in April ~~2020~~ 2022. I was moved to St. Martinville in July or August of 2022.

January February March April May June July August September October November December
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

9) I came to Angola from St. Martinville.

7) At the other facilities I have been, I was receiving substance abuse treatment. I do not receive substance abuse counseling at Angola. I found the substance abuse counseling very helpful and want to have it again.

10) At Bridge City, I got to see my family more. My nephew and my brother visited me at Bridge City in Jefferson Parish. My nephew and my brother have not visited me at Angola. Being able to talk to them was helpful to me.

11) In my cell, there is mold in the sink. I can see mold in the pipes where the water comes out of. I have to brush my teeth with this water where the mold is. I have to drink out of the taps of where the mold is. I have to put my mouth up to the taps where the mold is whenever I brush my teeth.

~~14) While I was in Doc A, a DOC guard said O.D. hit him. O.D.'s guards started spraying me on all of us even though we weren't involved.~~

12) I see DOC guards every day. Every time there's a fight between the kids or staff, DOC responds.

January February March April May June July August September October November December
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

⑬ While I was on Pod A, a youth hit a guard. OJJ and DOC guards came into the classroom and started grabbing all the kids. There were 8 of us ^{kids} in the room. Only one youth had hit the guard. DOC ordered everyone on the wall. The DOC guards grabbed and twisted my arm. They hurt me. I was not part of the fight. After this incident, all of us were locked in our cells for 3 or 4 days without leaving. We did not get to leave our cells at all for those 3 or 4 days except for to use the showers.

⑭ About 3 or 4 times our whole pod has been locked down and we are not able to leave our cells except to shower. They would keep us locked in the whole weekend.

P 4 of 8

January February March April May June July August September October November December
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

⑭ When DOC guards arrive, all OTJ staff say the situation is out of their hands and whatever DOC says goes.

⑮ On another time, we were in the dining hall. A boy struck a guard. The staff got him on the ground and were punching him. The staff started macing all of us. No one else had hit any of the guards but they were macing us all. The staff was hitting the first boy while he was on the ground being maced.

⑯ I have seen mace used one other time, but I was not hit. Another boy was maced.

⑰ In the incident in the classroom, DOC staff came in with sticks

January February March April May June July August September October November December
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

with bands around their hands. I was scared because I didn't know what they were going to do with the sticks and I know OIJ won't stop DOL.

18) When it is cold here, we won't get hot water and cannot take shower. Every time it rains hard nearby, the power goes out and we get locked in our cells except for lunch and dinner.

19) When we can't go outside for recreation, we all just play X-Box in the dining room.

20) If we can't go outside, we can't exercise. No staff member tries to lead in door exercise.

22) When the power goes out after it rains, sometimes we get locked in our cells a whole day. We don't get to go to the classroom for school.

January February March April May June July August September October November December
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

the power is out.

(23) Even if they transfer me to another facility, I am worried they will ship me back here to Angola. This is much worse than the other facilities.

(24) Every day, they lock us in our cells alone at 5pm. We don't get out until around 6:45am the next day. During school days, we get locked back in our cell about 5 times during the day before 5pm.

(25) On non-school days, we are locked up most of the day. We only get out for rec twice for 3 hours a piece, and for meals. Otherwise we're locked up alone.

PA + 0

January February March April May June July August September October November December
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

I declare under penalty
of perjury pursuant to
28 USC 1746 that the
foregoing declaration is true
and accurate



[Handwritten Signature]
Christopher Monell, witness