

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF LOUISIANA**

ALEX A., by and through his guardian,  
Molly Smith; BRIAN B.; and CHARLES  
C., by and through his guardian Kenione  
Rogers, individually and on behalf of all  
others similarly situated,

Plaintiffs,

DANIEL D. by and through his guardian,  
Angela Williams, EDWARD E., by and  
through his guardian Jernita Williams, and  
FRANK F., by and through his guardian,  
Taquita Morgan,

Proposed Plaintiffs,

v.

GOVERNOR JOHN BEL EDWARDS, in  
his official capacity as Governor of  
Louisiana; WILLIAM SOMMERS,<sup>1</sup> in his  
official capacity as Deputy Secretary of the  
Office of Juvenile Justice, JAMES M.  
LEBLANC, in his official capacity as  
Secretary of the Louisiana Department of  
Public Safety & Corrections,

Defendants.

Civil Action No. 3:22-cv-573-SDD-RLB

**MOTION FOR LEAVE TO AMEND  
COMPLAINT**

**EXHIBIT 2**

**FRANK F. DECLARATION  
REDACTED**

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<sup>1</sup> On November 18, 2022, Gov. Edwards announced the resignation of Dep. Sec. Sommers and the appointment of Otha “Curtis” Nelson as his replacement. <https://gov.louisiana.gov/index.cfm/newsroom/detail/3892> Because Sommers was sued in his official capacity, Nelson is automatically substituted as a Defendant. Fed. R. Civ. P. 25(d). Plaintiff leaves Sommers as a Defendant until the clerk is ordered to change the caption, and also replace him as a party with Nelson in the proposed Second Amended Class Action Complaint, filed simultaneously with this motion.

Alex A., by and through his  
guardian, Molly Smithe,  
et al.  
Plaintiffs

v.

Governor John Bel Edwards,  
in his official capacity as  
Governor of Louisiana, et  
al.  
Defendants

22-CV-573

I, **Redacted**, hereby declare the following  
to be true under penalty of perjury:

- (1) I am 16 years-old and am making this declaration  
of my own free will. Everything in this declaration  
~~is~~ is true to the best of my personal knowledge.
- (2) I normally reside in East Baton Rouge Parish  
with my mom and grandma and grandpa.  
My mom's name is Taquita Morgan. My  
grandma's name is Clara Dorsey.
- (3) I am currently in OTJ custody. My full term  
date is June 7, 2024.
- (4) I was taken into OTJ custody on or  
around September 20, 2020.
- (5) I am presently housed at OTJ's West Feliciana  
campus at Angela. I got moved here  
on or around March 8, 2023.
- (6) I am currently in C-Pod. I have been

in C Pod for about a week. Before C-Pod, I was in B-Pod.

- (7) Before being moved to Angola, I was first put in a group home. Then I was moved Swanson around March 2021. I was there for three months until I was put in another group home. I went back to Swanson on or around October 2021.
- (8) I came to Angola after furlough from Swanson.
- (9) At the other facilities I have been, I have not had to be alone in a cell every day. I am alone in my cell every day from around 4 pm to 8 am. Most of the time I sleep.
- (10) The past two days, I have been alone in my cell all day. I was not allowed to come out except to shower, and I did not get to talk to anyone.
- (11) The food here is terrible. It is much worse than other facilities in OJJ where I've been.
- (12) I have an Individualized Education Program (IEP), and one of the accommodations I'm supposed to get is having materials read aloud to me. That doesn't happen here.

(13) At Swanson, I got grasp therapy for an hour every day. The grasp therapy was helpful to me. I do not get grasp therapy here at Angola.

(14) We don't always have hot water in the bathroom to take a shower.

(15) When I was at Swanson, I got to use the phone to call home. That was my favorite thing to do. I do not get to use the phone to call home when I work. I just get a video visit twice a week.

(16) This is the worst OJS facility I have been in. It's even worse than St. Martinville, where I had to be quarantined before entering Swanson again in October 2021.

(17) I have never been allowed to go outside for recreation on the weekends.

3/21/23  
Date

**Redacted**

[Signature]  
Ashley Darter, witness