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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

JOHN PHILIP STIRLING,

Petitioner,

v.

**DEWAYNE HENDRIX, Warden,
FCI Sheridan,**

Respondent.

Case No. 3:20-cv-00712-SB

**SEVENTH DECLARATION OF
COURTNEY WITHYCOMBE,
FEDERAL PUBLIC
DEFENDER INVESTIGATOR**

I, Courtney Withycombe, declare:

1. I am employed by the Federal Public Defender for the District of Oregon as an investigator and have served in this position since 2019. My employment since 2005 has been in criminal defense investigation. My current work involves conducting investigation activities in a range of criminal defense cases, including habeas corpus and compassionate release matters.

2. I have been the lead investigator on the federal habeas petitions, now numbering over 150, that have been filed in this district to challenge the constitutionality of confinement at Sheridan under 28 U.S.C. § 2241. The lead case is *Stirling v. Salazar*, 3:20-cv-00712-SB.
3. This is the seventh declaration I have made regarding information received about conditions at Sheridan experienced by petitioners and other inmates.¹ This seventh Declaration is based on emails and phone calls that I have received from inmates, conversations and emails with family members of inmates, and communications with attorneys during the week of July 25, 2022, and during the week of the hunger strike by Sheridan residents in June 2022.
4. The reports received during the last week describe an unusual and frightening level of violence at the Sheridan prison. Residents there believe they are being retaliated against for alerting their attorneys and filing federal claims to describe the unconstitutional conditions under which they are being held. The reports describe brutal violence, threats, destruction of property, and psychological abuse. In particular, the reports name specific inmates who were beaten, bloodied, intimidated, and in at least one case rendered unconscious and removed on a stretcher.

July Reports of Assaults by Staff, Property Being Destroyed, and Fear of Retaliation:

- We were extracted the other day by SORT teams from across the nation and told that "we did this" and "this is your own damn fault". So we are being RETALIATED against for filing this petition against the prison for mistreatment and excessive lockdowns? Then I personally have very little property and they take my toothbrush, soap dish and soap, shampoo, all spoons and forks, my coffee cup, my drinking

¹ Earlier declarations are docketed at ECF 16; 72; 89; 98; 109.

bottle.All of which I have receipts for.They were slamming old men into walls and choking them out because they cant move very fast. This is an outrage (sent 7/27/2022)

- so i got to do a tort claim...their is a total of 120 people in the unit and 110 of us are doing tort claims...its crazy from radios to shower shoes...from tooth brushes to shorts...my cellie has to use my shower shoes and im using his socks...fuckin nuts...i would say out of the whole unit at the very minium and i just asked a few people how much money do you think that they took from us out of just spite and i said at least 6000\$ and and with the books that our family bought and the commissary and hygine and shoes and clothes and radios we as a hole unit with a 110 people over \$ 10,000...that is crazy ...1 person alone got got 700\$ in food and cloths...i would say me alone is 350 at least ...menice that dont have shit but beans and soups and hygine they got him for 100..and whats fucked up is he dont have shit to get got like that...cups and bowls its just f\$#%d up and **when they came in thay said you YOU GOT THIS COMING..so its retaliation...and i dont know what we did wrong we dont fight we dont make drama..ya their is those people filing paper work becuase of medical and counselors not doing FSA credits properly,,**but as a whole we dont do s%\$t except let them walk all over us..we dont even complain about being locked down all the time for 2+years..pleae forward this to the lawyer and prison policy..and since these new COs have got here we have no yard and no classes just when we started getting back to some kind of normal,,this is what we get and the new COS are trying to fight all of us..saying lets go i wish you would you look big try me..pressing on us..all the time getting in our faces for no reason and they are leaving in a week and some new guy is going to take their place and try to 1 up the last guy..and its all reatallation...whan is going to stop...send this to lisa hay please...at the end of the day i just want to go to school and have yard 1 time a day and go to collage and be bettger than when i got here..they are just playing with our mental health and our freedom...ask the lawyer to please help us...we are all struggling (forwarded from wife of inmate 7/27/2022)
- ms hay,they had a shake down yesterday and throw all my personal property away,i lost over 400 dollars worth of my property,and being that i have a interacial family and they clearly went through my pictures etc,i think what they done to me was racially motivated..i have a cell mate and we had some of the exact same things and they didnt take nothing really from him,but me they took all my shoes the 2 pair they told us we can have,and left me with mitch match shoes,my shower shoes they left me only one,my headphones they took mines but didnt take my cell mates,all my commissary,all my socks and t shirts which i bought at commissary,radios,mp3 player,and much more,im so upset im really thinking of checking myself in the hole and do the reminder of my time in the shu,this place has been so bad for me both mentally and physically,because the racism at this place is something thats so bad its scary,and i say this and im born and raised in louisiana,i can even begin to tell u how disrespected i feel,not only have they totally neglected me medically,and my mental

health which i have paper work to prove all i speak,but now its this,this place have really messed my head up and damn near just feel like giving up,i been here close to 3 yrs and ive never seen the things that goes on at this plcae..im asking u to please help,being that **im apart of this lawsuit**,and i literally have no place to turn at this point...im in desperate need of help,because this is inhumane,and human surrage at it finest...thank u,also thank u for the paperwork u sent me to help with my motion,its huge to what i hope to accomplish..thanks again (sent 7/29/2022)

- This week the warden Dewayne Hendrix ordered officers from outside the institution to come in and shake us down. They shook down unit 2A last week, I could see through the window them bringing out some black man unconscious cuffed and strapped face-down to a stretcher, I was probably 75 feet away and I could see blood dripping from the stretcher. They removed several other inmates in handcuffs, those who "bucked" (i.e. stood up for themselves in any way, asked for respect, "talked back"). We heard from other inmates how the shakedown worked, they came in and gave green duffel bags (I later measured them to be 4 cubic feet, my locker is 10 cubic feet), told all the inmates that they had to fill the green bags with all their property. They were given less than an hour to pack their entire life into a bag; there is no rule that says all your things have to fit in a duffel bag.

The unit filled with dozens of cops, rushing in, all unfamiliar, none with nametags. They crowded systematically around the entire walls around the unit to the door and opened the first cell. They opened cells and one by one grabbed the people inside and slammed them against the wall, jammed their elbows into the inmate's backs, screaming into their ears to put their hands up. Some inmates were told to put their hands up, then told to pull their pants up by another officer, and when they dropped their hands to pull their pants up, the officers picked them up and slammed them onto the ground. They then cuffed them up and took them to the ice-room. Always the ice-room, where there's no cameras, and beat them. That's where they took the man I saw unconscious on the stretcher. I saw many other people get dragged to the ice-room when they came for us.

That was last Thursday. They took the weekend off. Monday they came for the unit across the hall, 3B. We were locked down and given a frozen box lunch with 2 crackers, a slice of baloney, 4 pieces of bread, and a packet of peanut butter. We have eaten that every meal for 4 days, 3 times a day. We saw through the window inmates dragged out of 3B, bleeding, bruised and swollen, being dragged out to the SHU.

They came for our unit, 3A, yesterday on Tuesday, July 26. We were given our green bags, and told to fill them, we were given no other instruction. Then, they came. Rushing it, the unit filled with cops, just like 2A said it was. They lined the walls. They started 6 doors down from me, yanking inmates out and smashing them against the wall, screaming into their ear. One inmate, [name redacted], told them "get the f#\$k off of me", and I watched, helplessly through my window, as the 5 police picked him up, 4 feet in the air, and slammed him into the ground. I heard the smack as he

hit the ground over all the bustle in the unit. I watched the cops get on top of him, and saw their arms cocking back as they punched him over and over and over. They realized that they wanted to beat him worse than they already had. So they took him into the shower by the ice-room and beat him, I could hear his screams from across the unit. (Sent 7/28/2022)

- This week at Sheridan FCI, the warden Dewayne Hendrix brought in dozens of officers from outside the institution to shake us down. I'm convinced that this action was done entirely in retaliation for the 2241 habeas corpus filing that has been organized by the office of the Federal Public Defenders and Lisa Hay. Several officers have made statements to me personally, as well as to other inmates, that this is true, and have said that they are going to file because it isn't right. I hope that they'll keep their honor and their word.

It started with unfamiliar faces. These officers wore darker clothing, like some sort of semi-formal uniform, had on different types of stab-vests. They wore shirts that said "Sheridan Disruption Unit". They stared at us hatefully as we walked out of the cafeteria for breakfast. It was unusually quiet, and everyone had a bad feeling.

No moves were called, no school, or law-library. We watched through the window as the horde of officers trudged, jack-boots, stab-vests, and gloves, down the walkway to 2-Building, and turned left into 2A. People that spoke up for themselves and their fellow captives were dragged to the ground and beaten. We watched helplessly through the window as several men were dragged from the building in handcuffs, one black man was hogtied with handcuffs linked backwards to his leg-shackles lying facedown on a stretcher. From over a hundred feet away, through a dirty window frosted over with our breath, I could see the blood dripping off his head onto the ground. Officer redacted, an officer who has worked in Sheridan prior to this event, and has never assaulted an inmate as far as I've seen, told me the next day that these mens' captain, Nunez, had punched this man while his subordinates held him, slammed his head into the ground several times, and choked him with both hands while he lay handcuffed on the ground. I told Coyle that when these men were gone, the blame would fall to the officers who work here permanently, and that he needs to report what he saw to get ahead of it. He said he would, I hope he decides to honor that. That was our first indication of what was going to happen to us. That was Thursday, July 21.

On Monday July 25, we were locked down while they shook down the unit 3B, across the hall from me. It became obvious that this was going to be a systematic assault to the entire institution, but I could never have guessed, even by seeing the several bloody, beaten inmates coming out of 3B, how bad it was going to really be. We were fed peanut butter and jelly sandwiches for every meal for 3 days. You'd feel the insulin spike from the sugar, and crash an hour later, starving and tired.

On Tuesday, July 26, they came for us.

First, green duffel bags were brought into the unit. We were told that everything in our possession has to fit in this green duffel bag. The bag fits 4 cubic feet, the locker that we are provided by the institution is 10 cubic feet, and there is nothing in the BOP policy that says everything has to fit in the locker. Shoes, for example, can be under the bed, and clothes can be hanging up. We packed what we could into the small space that was provided to us, we prioritized family pictures over food that our families had paid for, packed what few books we could, Muslims chose to keep their prayer rugs instead of clothes, radios, and headphones. He feverishly packed, terrified of what comes next.

And then they came. Dozens of men rushing in. They wore black tape over their name-tags, they had no protective gear, masks or spit-shields or anything, at least 40 of them and we can't even hug our family or visit with them because of "Covid-19 restrictions". They lined up against the walls and began systematically opening cells and pulling people out, they would tell you to back out of your cell with your hands on your head, and when you reached the opening, several men would seize you at once, pull you aside, and slam you against the wall, and jam their elbow into your back, pushing you against the wall, screaming threats into your ear. I heard "PUT YOUR FUCKING HANDS UP". Several times I heard "PUT YOUR HANDS UP OR I'LL FUCKING KILL YOU". I watched a man named Bradford Johnson, a young black man, pulled from his cell and slammed against the wall, he said something to these men that I couldn't hear, the officer that had seized him screamed an inch away from his ear, over the bustle of the whole shakedown, I heard that across the unit. "PULL YOUR PANTS UP"

When he reached down to pull his pants up, I watched 5 men pick him up, in a coordinated maneuver they'd obviously talked about before, and lift him as high as they could reach, and slam him face-first into the ground.

I heard his head smack the ground, like a baseball hitting a catcher's mitt. I heard him cry out and the officers cocked back and punched him in the back and sides of his head, there was at least 5 men on top of him. They then dragged him up the stairs and into the shower, where there's no cameras, and I heard the screams and they beat him. The worst part is how, eventually, the screams stopped, and they picked him up and carried him out of the unit. I haven't seen him since.

I watched all this in horror through the small window in my cell, and watched them come cell to cell, beating and slamming everybody they touched. My heartrate was spiking, I felt like I was having a panic-attack. I heard a key slid into the door of my cell....I said "you never asked me a question", and I felt a gloved hand bang my head a second time off the wall. This time I felt like it hurt less, but disoriented me more. I was dizzy and felt like throwing up."DON'T TALK BACK TO ME, I'll FUCKING KILL YOU".....

The hands pulled me off the wall and flipped me around, and I saw the adjacent wall speeding toward me. I had a split second to feel fear, pure terror, before the wall hit my face and split my lip open. I was thrown sideways to another officer, and shoved against the wall. I felt an elbow jammed in my back. I looked sideways, there were cell doors lined up along the wall, and the spaces between cells each had a terrified inmate jammed into the wall, each with a correctional officer shoving his elbow into their back.

"NEXT!"

One by one, we're shoved to the next space, slammed again, the elbow replaced. I saw many acts of violence, and screams and threats.

I comply, walking slowly up the stairs, I feel blood leaking down my face and I'm afraid to wipe it away. I walk up the stairs, and am directed around the corner to the density scanner. ...

I'm lined up stumbling from the unit out the door, looking around me at my fellow captives, some bleeding and beaten, some merely shocked, some with eyes already swollen shut. I walk out the front door and feel a tremendous weight fall from my shoulders as I feel that first breeze blow onto my face, and realize that I'm outside of that slaughterhouse and I'm safe, for now. Another officer stands in front of me next to a stack of cardboard boxes, he looks over my bleeding lip and bruised face and stricken, terrified eyes, reaches in and hands me a box lunch of peanut butter and jelly, and with a big smile he says, "Have a nice day!"

The green duffel bag thing was obviously somebody's idea of a cruel joke. We essentially packed our own trashbags. My shower shoes we gone, all my clothing and food, all my coffee, my headphones were broken in half, my family pictures had been shredded, and many of them I could see were thrown in the toilet.

I've been in federal prison, mostly on this compound, for 10 years. At the end of this assault, I have an mp3 player, a taped-up half-broken pair of headphones, 3 bowls, and 10 books. I have no clothing, food, coffee, most of my legal work is gone. It's obviously easier for me to give a list of what's left than what's missing. When we came back to the unit, we were given our new cell assignments and a small bag of whatever property was left. I heard somebody complain that most of their property was missing, and one of the anonymous mercenary cops tell him that he'd "throw you in a cell with a sex offender and make him f*** you in the a**. Get the f*** out of here".

As I'd previously said. I've been in prison for 10 years. I've done a significant amount of time for a nonviolent drug offense. I've paid my dues, in my opinion, especially after 2 and a half years of covid lockdown, but in my judge's opinion, I still have 4 more years to do. I've never seen anything as systematically violent as what I saw

happen on July 26 in my unit. I've been requesting that the cops take pictures of my injuries for the file, but I've been told that "I just don't learn, do I."...

Well, the cops just came in and systematically beat the shit out of every inmate in the institution because of that lawsuit. They knew it, the cops working here know it, and every inmate damn sure knows now it too, so you better get us something out of it, because we just paid the price for what we've all done together, and we put our trust in you to carry that torch. My face is still swollen, my lips crack when I smile or yawn... Please, make it worth the pain Thank You,. (sent 7/28/2022)

- hey i just wanted to informe you of the stuff that happend to us on july 25th this monday they called in a bunch of c/o s from another institution that were called in to mess everything up and serch our cells but while they were here they assaulted a bunch of people through us out side cussed us out and tossed our belongings in the trash we cant get back ,that was shoes ,food radio, pictures, laundry, exc. its really odd because the c/o s here cant even control them and they dissrespect them as well they dont have name tags and they take people out of the cameras view so they can ruff you up(sent 7/28/2022)
- as of Monday the 25 of july guards entered fci sherdan and began to strip search our rooms and take our personal property,we were fed sack lunches for 3 days no hot meals, and our linen was taken away numerous inmates were assaulted by these gaurds and as of today i have gone 3 days with no linen i have had to sleep in my sweats an jacket to keep warm.(sent 7/28/2022 DB.)
- This email is in regards to the ongoing Psychological Torture I continue to have to endure here at FCI Sheridan. I am pretty sure you are tired of these emails but who else will listen because it seems as if no one is! However I understand this is jail and searches will be conducted but when you conduct these searches with Malice that is different and makes me wonder more like "is these staff are really trying to break me down mentally" because I feel as if they are! Not only was I robbed for my Canteen that was all sealed and unopened but they switched every inmate cell and not one inmate were given cleaning supplies to clean these new cells especially when Covid going around in this Facility (in 2 Units Right now) when I personally asked staff not knowing their names because most of them had their name tags removed I was told " we don't care about Covid you will get a chance to clean your cells when we have time." that was yesterday! We were forced to sleep in unsanitized cells! The level of disregard and the dehumanization that these officers in FCI Sheridan imposes on me and I am sure other inmates is becoming overwhelming! And yet we are left to sit and wonder what is next! I never been so depressed in my life and I feel this trauma caused here will forever leave a scar on me! (sent 7/29/2022)
- This email is to continue to inform you of the conditions at F.C.I Sheridan.

Its been about 3 weeks sense my unit ran out of HDQ sanitizer. They have been filling the sanitizer bottle with a random cleaner that does not sanitize. There was active covid cases last week and there are new cases this week. We still remain on level 2 operations and are mixing with the rest of the prison still.

The last 2 weeks they have been doing a institutional shake down with a specials team from people from other prisons. These same guys have shook down every unit. They aren't wearing any face coverings potentially continuing the spread of Covid-19. This specials team has also been randomly harassing inmates to provoke into assault.

We still have no education, they First Step Act classes are limited to just 3 or 4 programs and there are still no Vocational Education availability going on the 18 months I've been here. The staff is still very unprofessional and disrespectful. (sent 7/29/2022)

- I WOULD LIKE TO INFORM YOU THAT F.C.I SHERIDAN HAD THIS BIG SERCH OF THE UNITS,YARD ECT.THEY CAME THROUGH AND TOOK ALOT OF EVERYONES PERSONAL PROPERTY AND THROUG IT OUT.I LOST EVERYTHING MISS HAY.ALL MY LEAGAL WORK,PERSONAL PICTUERS,RADIO.THEY JUST DESTOED MY CELL AND MIXED ALL OF OUR STUFF TOGETHER,MY CELL MATE.THROUGH US UP ON THE WALL.CALLED ME A PEACE OF SHIT AND HOW DO YOU LIKE LOUSING YOUER CELL TO A CHO-MO.I SEEN THEM PUT HAND ON A FRIND OF MINE AND DRAG HIM OFF CAMRA AND SLAM HIS FACE IN THE ICE MACHINE.NOW I GET THAT THEY HAVE TO DO SERCHES .MAKE SURE THINGS ARE THE WAY THERE SOPPSED TO BE.BUT TO COME IN LIKE THEY DID,PUT HANDS ON PEOPLE,TAKE THERE PERSONAL PROPERTY,LEAGAL WORK,PHONE NUMBERS,PICTUERS AND JUST DEGRAD PEOPLE LIKE THEY DID.CALLING US PUNKS AND PEICES OF SHIT IT JUST WRONG AND UNPERFESHONAL.PLEASES FORGIVE THE SPELLING.MRS HAY,I LOST ALL MY STUFF,EVERYTHING,BUT THATS NOT WHAT IM ASKING TO GET BACK,IM JUST SAYING THAT WE ARE GETTING MESSED WITH REALLY BAD DOWN HERE AND FOR WHAT,I DONT KNOW THAT ANYONE DID ANYTHING TO DESERVE THIS KIND OF TREATMENT.PLEASE HAVE SOME ONE COME DOWN AND LOOK INTO THIS OK.THIS IS JUST WRONG.THANK YOU FOR YOUER TIME.(sent 7/28/2022)
- The guards did a search of the prison and the only thing they left in my sons cell was family photos. They took 100 dollars worth of food that I payed for. I'm on disability so my income is very limited. When the guards raided the cells they told the inmates that they came with the "DEVILS BLESSING" And they were not wearing name tags

and the ones with name tags were not their correct names. They removed his cell mate and took him to where there were no cameras and beat him up. He came back with bruises on his face. They were moved to different cells and they were only given a mattress. They did not give them a blanket until after midnight. They get locked in their cells for days very often. They were also locked outside for 8 hours with a jug of water and no cups. This is a horrible way to treat these men. I'm in fear for my son's safety every day. There is also dirt and garbage EVERYWHERE and they have been denied cleaning supplies. This is awful. I pray to God that somebody can help these men. This is cruelty to the max. I hope you are the right person that I have been searching for. My son gave me all of this information. I'm afraid for his safety. This is really serious. Thank you very much and I hope to get a response from you. . (sent 7/27/2022 by a parent of inmate)

- They have officers here from other higher security institutions helping with unit raids and stuff so it is just crazy right now, they are being even worse with the other units, running into their cells and slamming them up against the wall and stuff. I've seen a couple people come out on stretchers with swollen faces. They did it to one of the guys in my unit as well when they did the search in our unit. I don't know what's happening, it's crazy, people are saying it's retaliation for all the lawsuits or whatever which seems crazy to me that they would just do more of the things that people are suing them about in retaliation for them suing. Makes no sense but nothing makes sense here. (email forwarded from a parent of inmate on 7/27/2022)
- I talked to my son again from FCI Sheridan and they sent a letter out to you last night. So he said it's the group of guards that come in, he thinks they are called the sert team? They would not give them confiscation forms for all the stuff they took from them they are telling them they have to donate their belongings to the prison. They come in to cause devastation to these men, egging them on calling them punk bitches. They still have no sheets or toilet paper. They say they are there to f them up. They are also being denied medical. At one point they went 4 weeks with no water. The guards came around once a week with water buckets to flush their toilets. When they lock them down they are fed nothing but bologna sandwiches and denied showers. What should other people do that don't have family to email you? (sent by a parent of inmate on 7/27/2022)
- so i got to do a tort claim...their is a total of 120 people in the unit and 110 of us are doing tort claims...its crazy from radios to shower shoes...from tooth brushes to shorts...my cellie has to use my shower shoes and im using his socks...fuckin nuts...i would say out of the whole unit at the very minium and i just asked a few people how much money do you think that they took from us out of just spite and i said at least 6000\$ and and with the books that our family bought and the comissary and hygine and shoes and clothes and radios we as a hole unit with a 110 people over \$ 10,000...that is crazy ...1 person alone got got 700\$ in food and cloths...i would say me alone is 350 at least ...menice that dont have shit but beans and soups and hygine

they got him for 100..and whats fucked up is he dont have shit to get got like that...cups and bowls its just f\$#%d up and **when they came in thay said you YOU GOT THIS COMING..so its retaliation...and i dont know what we did wrong we dont fight we dont make drama..ya their is those people filing paper work becuase of medical and counselors not doing FSA credits properly,,**but as a whole we dont do s%\$t except let them walk all over us..we dont even complain about being locked down all the time for 2+years..pleae forward this to the lawyer and prison policy..and since these new COs have got here we have no yard and no classes just when we started getting back to some kind of normal,,this is what we get and the new COS are trying to fight all of us..saying lets go i wish you would you look big try me..pressing on us..all the time getting in our faces for no reason and they are leaving in a week and some new guy is going to take their place and try to 1 up the last guy..and its all reatalation...whan is going to stop...send this to lisa hay please...at the end of the day i just want to go to school and have yard 1 time a day and go to collage and be bettger than when i got here..they are just playing with our mental health and our freedom...ask the lawyer to please help us...we are all struggling (forwarded from wife of inmate 7/27/2022)

- A client, at the FCI, also talked about guards retaliating against people who complain and frequently mention the lawsuit. He said they are being unusually cruel. He said one man had photographs of his daughter who recently died in his cell. He'd been asking the guards to speak to his daughter before she died and it pissed them off. They then came into his cell and ripped the photographs up. The client said he's been in a lot of prisons in his life and he's never seen anything as bad as it is now.(sent from attorney)
- not feeling well they threw out all my meds in the raid and everyone lost so much stuff, thye threw away my books and most of my commissary and personal items...its terrible whats goin on (email forwarded by parent of inmate on 7/29/2022)

Inmates and Families Are Reporting Abuse, Neglect and Retaliation at the Detention Center:

- It is unfortunate I am again writing this letter regarding Sheridan Detention Center. I have written to BOP, the Detention Center and yourself months ago.

Unfortunately, the concerns that have been addressed are clearly just that...concerns. Lets not isolate these concerns to myself....these are concerns of many many inmates as well as civilians. It is understood by many that you were addressing these matters (approiximately 2 years prior) and to date there is no update available.

These inmates continue to have the few rights they have to be violated. Using isolation as incarceration is a psychological breakdown of the mind. Forbidding there to be "visitation" again is psychological abuse. I continue to be broken in hearing and knowing the mental state my son is being forced to endure. Add his mental state

with his medical issues (THAT ARE NEVER ADDRESSED DUE TO NO MEDICAL STAFF) makes any normal person seek resolution. These folks cannot reach out or obtain any help ...they cant even have someone listen to them....Covid and or "understaffed" is not justification for this.

Because my prior correspondence appears to be without regard or validation I will begin corresponding with another level of the system. Our system surely does not condone these behaviors (or lack of) as the American way. I am 100% convinced this will continue as long as those with "power" are permitted to work the "powerless" Reaching out to the other level of the system will allow all the behind the doors mistreatment to be known. I anticipate a media /news coverage to address a detention center that has become one of abuse and neglect (sent by parent of inmate on 6/17/2022)

- 06/25/2022 @ 3:30am: Hunger Strike, Day 5 - Institution CERT TEAM (30 Officers in Riot Gear) crashed into the unit and began extricating inmates by force, one cell at a time. They came with Fire extinguishers full of bear mace, pepper spray, and riot batons. They removed inmate (redacted name) and his cellie, as well as 4 other representatives from various races. The detainees were removed in their under shorts and slippers only, handcuffed while in the cell, and taken to cold rooms (freezing cold holding cells). CERT Team continued to repeat this process cell by cell with every man in Unit J2. The bunk areas and cells were maliciously tossed and all minor contraband confiscated. Administration was attempting to flex its muscles in the most painful manner available to them, outside of physically beating the detainees. The search and shakedown lasted until 7:00am, Then TV sets were unplugged. No showers' were offered or given, no cosmetics/hygiene were offered or given. Full 24 hour lockdown remained. (forwarded by attorney to our office)
- In the middle of the hunger strike, guards rushed in in the middle of the night and dragged everyone out of their cells. They took food inmates had and stomped it on the floor while taunting them They left most of them in holding cells with no clothing and blankets for two days. (sent from attorney)
- A client, who is mentally ill, said he's stopped asking guards about getting mental health treatment because the guards get very angry and yell about how they are being sued and retaliate against people who complain. He said all the guards are from other states and are here temporarily. He said it feels like they intentionally picked guards who would be as cruel as possible. (sent from an attorney)
- Being fully aware of you continued attempts at addressing the conditions at the Detention Center I am not satisfied with the results you are given. Let me address the conditions over the last 3 weeks. It continues to get worse.

*On or about July 19 an inmate returned to the unit after being covid tested...the inmate returned saying "yep I tested positive". Now just how in the hell is the facility following Covid protocol ? Why was he allowed back in the unit ? Then a covid lockdown was ordered for the entire unit. 11 inmates out of 120 tested positive. Isolate the 11 not the entire unit.

*The lockdown forbids these inmates from any phone availability....no email.....so isolation from family is again a psychological breakdown of the mind.

*The inmates are given a sack lunch with a peanut butter sandwich and a form of a pretzel. Not even a piece of fruit. School lunches are far better then this as well since when is this ample amount for grown men ?

*The inmates are allowed 15 min every other day for showers. Unacceptable

*The inmates that have court dates or attorney consultations have had their appointments canceled. They have no attorney phone calls or emails. Not even legal.

*The inmates have no medical care. Refills for medication are ignored and the inmate has none to take.

*Many inmates continue to have mental breakdowns resulting in yelling and crying for hours to "make them stop". Part of the mental breakdown mentioned earlier.

*These inmates have had no rec/outside time in over a month.

*The inmates are forbidden from going to the store. Not feeding them nutritional meals and limiting then to care of personal hygiene matters is compounded when their ability to purchase their own product is taken away.

I have written letters to US Attorney and Kate Brown. I will now send one to Mayor. All these letters and your input in the conditions of this facility are a task no one should have to continue to complete. This is a system that is so corrupt it makes one feel embarrassed to be American. What must be done to make "them" understand that things are as bad as you have been telling them?

The mental damage already forced upon my son is severe. His medical conditions (that are ignored) added with his forced upon mental state will surely end up in an extremely dangerous condition. While we are going through the time consuming legal process to make one accountable for this treatment ...these inmates continue with inhuman treatment resulting in "violation of rights" being imposed as well as a population that is having their mental state altered. I will conclude this correspondence by saying that this population of inmates has assumed "charges"...however...they are legally innocent.

This part of our corrupt system needs to be accountable...no one seems to be so release the appropriate inmates. Should my correspondence be needed for your communication with any person to bring this to an end...please feel free to share. (sent by a parent 7/25/22)

- On July 5th, an attorney reported that she spoke to her client in the J2 unit of the FDC who reported that after a group of residents raised complaints with the administration

in June about the conditions and started a hunger strike, they were mistreated. The concerns they raised included the limited time outside their cells, lack of access to medical treatment, insufficient COVID protocols, staff opening legal mail outside the presence of the inmates, lack of access to the computer room, and limited or no outside recreational time. The unit was then locked down for ten days, beginning on Wednesday, June 22, 2022. The client explained that normally while on lockdown, an officer will pass out hygiene items, such as toilet paper, soap, toothbrushes, toothpaste, and razors, but no one provided these items to the J2 Unit during the ten day lockdown. In the early hours of June 26, 4:30 a.m., staff in riot gear entered the J2 Unit. They were wearing helmets, stab vests, shock shields, and combat boots. One of the officers was also carrying a video camera. The officers went to several cells and ordered the individuals to submit to restraints and led them out of the cells handcuffed and in their underwear. When the individuals returned to their cells, they were trashed. Personal photos were ripped off the wall, clothing, bedding, and other personal belongings were thrown on the floor, cleaning supplies were removed, and food packaging was opened. The next day, the staff unplugged all the televisions on the unit. The televisions remained unplugged for three to four days. The people in J2 were not allowed showers for six days. It was blistering hot in their cells during the daytime, and the staff would only turn on the air conditioning at night. The only relief from the heat and the only means of bathing was to take a bird bath in the sink.

In conclusion, I have been the primary point of contact in our office for inmates and their families regarding concerns about the conditions at Sheridan since the end of March 2020. In this seventh declaration, I have recorded recent pleas for help that our office has received.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct; that the statements set forth above are based on my own knowledge where indicated, or based on received reports from others that are corroborated by their consistency with other reports, and I believe those statements to be true; and that this declaration was executed on July 31, 2022, in Portland, Oregon.

/s/ Courtney Withycombe

Courtney Withycombe
FPD Investigator