

affidavit

State of Missouri)

) ss.

County of Cole)

I, William Irving # 182906, being first duly sworn upon my oath, depose and state:

1) I attest that in the last (18) eighteen months (1½ years) since about around August of 2022 or better, specifically in Administrative Segregation ("Ad-Seg") Housing Unit #7 ("H.U.#7") I and other prisoners similarly situated have been subjected to the following unconstitutional confinement in violation of our (8th) Eighth Amendment right to the U.S. Constitution and (14th) Fourteenth Amendment right by these Supervisors and their subordinates under their control and direction Superintendent Ms. Doris Falkenrath # E0116678; Assistant Warden Raina Martin # E00120257; COV. Major Norman Graham; COIV. Captain Debra Reed; Functional Unit Manager Mark Leonard # E0-100392; COII. Jeffery Tallent # E0118561; COII. Sgt. Lenny; and COII. Sgt. J. Sanni # E0140418

2) Unsafe Conditions, Emergency Call Buttons are not being answered by all three (3) shifts in H.U.#7 as a result (3) three prisoners have been found dead (1) one in cell 7-A-104 around October of 2021 (note: he tried to self-declare an medical emergency at 8:00pm medication pass, nurse (Kurl) and

guard told him to f-ck-off!). At least (7-11) seven-to-eleven (or more) prisoners have been stabbed (i.e. Kyrie-Hughes; etc.) for guard deliberately putting prisoners not assigned to their cells into their cells, and guards disaffording prisoners (majority of times) to self-declare medical emergencies.

3) Sick calls have only been done (3 or 4) three or four times instead of (5) five days per week.

4) Unsanitary Conditions. Showers and wings have went multiple months "filthy" and highly health-hazardous littered with trash; food; human feces upon toilet paper mentally disturbed prisoners push in the wing (several times piles of shit have been found in showers) and wings often wreak of urine and human feces. Guards repeatedly have stopped prisoner walkmen workers from adequately cleaning.

5) Haircuts (are supposed to be done once per month have only been done twice in ten (10) months. Prisoners have developed sores on their scalps are eating hair in their food unable to get a haircut or shave.

6) Denial of weekly reading books. Reading books

have not been and or not being passed out each week to all prisoners, nor are guards/supervisors going to get books from library every (2) two weeks.

7) Deprivation of clean clothing/bedding. Guards refused to do laundry until recently.

8) It should be noted that all guards and supervisors assigned to H.U.#7 deliberately curbed their job duties by going in case workers' offices to sleep; watch football games; eat snacks; and sexually harass women employees which breached our Constitutional Rights.

Pursuant to 28 U.S.C. § 1746 I declare upon the penalty of perjury that the facts stated herein are true and correct.

Date: 2/24/2023

Wm. Irving
affiant