

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT

JAMAAL CAMERON; RICHARD
BRIGGS; RAJ LEE; MICHAEL
CAMERON; MATTHEW
SAUNDERS, individually and on
behalf of all others similarly situated,

Plaintiffs,

Case 2:20-cv-10949-LVP-MJH

v.

MICHAEL BOUCHARD, in his
official capacity as Sheriff of Oakland
County; CURTIS D. CHILDS, in his
official capacity as Commander of
Corrective Services; OAKLAND
COUNTY, MICHIGAN,

Defendants.

DEFENDANTS' MOTION FOR RECONSIDERATION

NOW COME Defendants, MICHAEL BOUCHARD, CURTIS D. CHILDS and OAKLAND COUNTY, by and through their attorneys, POTTER DeAGOSTINO O’DEA & CLARK, and pursuant to E.D. Mich LR 7.1(g), hereby request the Court to reconsider its ruling in its April 17, 2020 Opinion and Order Granting Plaintiffs’ Motion for Temporary Restraining Order (“TRO”) for the reasons set forth in the brief accompanying this Motion.

POTTER, DeAGOSTINO, O’DEA & CLARK

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Dated: April 20, 2020 spotter@potterlaw.com

BRIEF IN SUPPORT OF MOTION FOR RECONSIDERATION

I. Factual Background

A. Procedural History

Plaintiffs, all convicted felons, filed the instant action on April 17, 2020. Plaintiffs’ Petition, titled “Petition for Writ of Habeas Corpus and Complaint for Injunctive and Declaratory Relief” seeks class certification for potentially all inmates incarcerated at Oakland County Jail and (without legal basis) requests their release

from jail. Throughout April 17th, Plaintiffs' filed a barrage of pleadings. These included an Emergency Motion for Temporary Restraining Order and Motion for Class Certification. After receipt of Plaintiffs' pleadings, Defendants waived service of Plaintiffs' Complaint and the undersigned spoke with Plaintiffs' counsel regarding a proposed briefing schedule. At that time, Plaintiffs' counsel proposed a hearing on Wednesday, April 22, 2020 with Defendants' Response due April 21, 2020. The undersigned advised Plaintiffs' counsel that Defendants could not agree to the proposed schedule but would agree to a hearing on April 24 with Defendants' brief due April 20. This phone call occurred at approximately 3:00 pm. Without any notice to Defendants or the undersigned, Plaintiffs' then proceeded to file their Emergency Motion to Expedite Consideration of Plaintiff's Motion for Temporary Restraining Order which was filed at 4:19 p.m. (R.12). Plaintiffs' Emergency Motion did not request a hearing date on April 22 as previously proposed by Plaintiffs' counsel and instead sought immediate consideration of its Motion for Temporary Restraining Order. It should be noted that the page total of Plaintiffs' filings (including exhibits) on April 17 totaled 615 pages.

Less than two (2) hours after Plaintiffs' Emergency Motion to Expedite Consideration of Plaintiffs' Motion for Temporary Restraining Order and prior to Defendants filing any response to any of Plaintiffs' filings, this Court entered its

Opinion and Order granting Plaintiff's Motion for Temporary Restraining Order. In its Opinion and Order, the Court made a determination that Plaintiffs showed a strong likelihood of success on the merits, entered Plaintiffs' requested TRO and ordered Defendants to take several measures in preparation of the TRO hearing including to provide Plaintiffs and the Court with a list of inmates who are members of the Medically-Vulnerable Subclass and provide Plaintiffs and the Court with a list of individuals in the Medically-Vulnerable Subclass who Defendants object to releasing and the basis for same. Because Defendants were unable to respond to Plaintiff's multiple filings, they were unable to advise the Court of the significant and numerous legal deficiencies in Plaintiffs' filings (notably there being no legal basis for this Court to release inmates as Plaintiffs request) nor were Defendants able to present evidence of the efforts and measures undertaken at the Oakland County Jail well before Plaintiffs' filed their lawsuit.

The Court's Opinion and Order is especially problematic considering the deference entitled to government officials charged with the operation of correctional facilities as discussed in more detail below. The Court's Opinion is further problematic because it permitted Plaintiffs' counsel to make inflammatory and false statements to the media regarding the conditions in the jail and defaming Defendant Bouchard. Plaintiffs' attorney Krithika Santhanam asserted called the situation "dire"

and stated, “if we don’t act swiftly, folks will die.” (Exhibit A, Article). According to Plaintiffs’ counsel Carey McGehee, “the Oakland County jail is particularly bad and something needs to be done not just for our clients and other prisoners, but for the jail staff, vendors and the public.” (Exhibit A). The truth reveals a far different story than what was able to be portrayed in the media following the Court’s Opinion and Order.

B. Oakland County Jail’s Pro-activity and Response to COVID-19

In reality, Defendants have taken an immediate and proactive response to the COVID-19 pandemic to curb an outbreak or spread at the Oakland County Jail. Prior to any confirmed cases, signs were posted throughout the jail advising inmates of the steps being taken to attempt to prevent the virus from entering the facility. (Exhibit B, Affidavit of Captain Curtis Childs, ¶17). This was posted throughout the jail as early as March 11, 2020. (Exhibit B, ¶17; Exhibit C, Sign). The posts advised inmates that extra cleaning was being performed throughout the facility including ultraviolet cleaning. (Exhibit B).

Part of the jail’s attempts to prevent and/or eliminate the spread of COVID-19 from entering and/or spreading throughout the jail has included various hygiene and cleanliness practices inside the jail. The following represent practices incorporated by the jail:

1. Inmates in the main jail receiving area are given showers three times a week and are given whatever soap is needed when they shower. Additionally, two bars of soap are also provided to inmates in receiving area two times per week. In the main jail, the inmates receive two bars of soap two times per week. In the Annex, inmates are allowed to shower daily and soap is provided when they shower. In addition, inmates in the Annex receive two bars of soap twice per week. Furthermore, the desk deputy in each housing area has extra boxes of soap that is available upon request. (Exhibit B, ¶ 5).
2. The jail uses a product called DMQ. The jail only dilutes this product pursuant to the manufacturer's instruction. The product is machine mixed at the jail. DMQ is available to all inmates when requested and no less than three times per day. It is provided to the inmates with food delivery. Inmates are provided sponges and rags in order to use the DMQ. When inmates are transferred between cells, the cells are always disinfected before use by the transferring inmates. (Exhibit B, ¶ 6).
3. Food preparation inmates are provided masks and gloves. Food delivery inmates are also provided masks and gloves. These requirements existed before COVID 19. (Exhibit B, ¶ 7).
4. All inmates are provided fresh, clean laundry once per week. (Exhibit B, ¶ 8).
5. Inmates performing laundry services are provided with gloves and masks and multiple clothing changes per day if requested. COVID 19 laundry is separated from laundry not suspected of COVID 19 contamination. (Exhibit B, ¶ 9).
6. With regard to sinks and toilets contained within cells, cleaning is performed by inmates with DMQ that is provided to them at a minimum of three times per day. (Exhibit B, ¶ 11).

7. With regard to PPE for correctional staff, all correctional staff have been issued masks and gloves. Additionally, N95 masks and face shields have been issued to correctional staff who have contact with inmates who have tested positive for COVID 19. (Exhibit B, ¶ 12)
8. With regard to common areas within the jail, all common areas are disinfected by custodial staff daily. (Exhibit B, ¶ 13).
9. With regard to shower cleanliness, showers in main jail are in cells and are cleaned by the inmates. Showers in Annex are cleaned by the trustees and are to be cleaned after each use by the inmates. The receiving showers are cleaned by trustees immediately after each use. (Exhibit B, ¶ 19).
10. With regard to the holding cells, inmates in the holding cells are not in the same vicinity as the positive and symptomatic inmates who are housed in separate pods. (Exhibit B, ¶ 20).

Hand sanitizer is not given to inmates due to an incident that occurred in October 2019 when inmates attempted to mix the hand sanitizer with other substances in an effort to create drinkable alcohol which resulted in several inmates becoming ill. (Exhibit B, ¶ 18; Exhibit D, Incident Report). With regard to inmates' communication with the medical staff, sick call slips are distributed to the inmates daily and picked up every morning by medical staff. (Exhibit F, Affidavit of Vicki-Lyn Warren, ¶ 3). Sick call slips are the protocol for inmates to self-report COVID-19 symptoms. (Exhibit F, ¶ 3). Individuals who are displaying COVID-19 symptoms are seen daily by the medical staff and assessed accordingly. (Exhibit F, ¶ 3). A full set of vitals is taken once per day. (Exhibit F, ¶ 3). Temperature is taken by the day,

afternoon and midnight medical shifts and therapeutics are administered as needed. (Exhibit F, ¶ 3). On Monday-Friday, each inmate in the facility is visited by a doctor or nurse practitioner at which time they are provided a lengthy verbal education by the doctor or nurse practitioner and are advised to immediately self-report any COVID-19 symptoms. (Exhibit F, ¶ 3).

Unfortunately, despite the jail's best efforts to prevent COVID-19 from entering the jail, an inmate tested positive for COVID-19. Subsequent to the first positive case, Oakland County Jail personnel have been extremely aggressive in preventing further outbreak. If an inmate tests positive, that inmate is transferred into a pod designated for COVID 19 individuals. If an inmate has significant symptoms of COVID 19, that inmate is transferred from their cell and put into an area designated as symptomatic pod. (Exhibit B, ¶ 4). All inmates who had contact with someone who tests positive or has significant symptoms of COVID 19 are then placed into quarantine for 14 days. (Exhibit B, ¶ 4).

This also includes testing of all inmates who have shown symptoms of COVID-19. (Exhibit F, ¶ 15). As of April 18, 2020, 242 inmates had received testing in the form of a swab. (Exhibit F, ¶ 15). Of the 242 tests, only 36 inmates have tested positive. (Exhibit F, ¶ 15). Five (5) of the 36 inmates who have tested positive have been released from custody. (Exhibit F, ¶ 15). Seven (7) of the 36 inmates who have

tested positive have recovered and are no longer quarantined. (Exhibit F, ¶ 15). Thus, 24 inmates remain in quarantine with positive results at the jail. (Exhibit F, ¶ 15). The total jail population as of April 17, 2020 was 742 inmates. (Exhibit I, Daily Inmate Population Report).

The jail has also taken measures to encourage reporting of COVID-19 symptoms by including the waiver of any cost for treatment related to COVID-19 or filing a medical grievance. (Exhibit F, ¶ 15).

C. Plaintiffs' Credibility (or lack thereof)

In support of Plaintiffs' Motion for TRO, Plaintiffs attach declarations containing allegations regarding the conditions of the jail. Because Defendants did not have an opportunity to respond to Plaintiffs' Motion (or allegations set forth in the affidavits), the Court potentially took the affiants and the allegations contained in the affidavits at face value. Interestingly, the affiants' criminal histories are replete with convictions related to crimes involving theft or dishonesty.

Raj Lee's criminal history includes convictions of felony home invasion, felony receiving and concealing stolen property, and most recently felony uttering and publishing counterfeit bills or notes. (Exhibit E, Summary of Criminal Histories).

David Kucharski's criminal history includes convictions of felony receiving and concealing stolen property, felony attempted home invasion, misdemeanor

operating a vehicle with a forgery/alteration/false ID, felony larceny in a building, felony home invasion (multiple convictions), felony attempted breaking and entering, felony tampering with electronic monitoring device and misdemeanor retail fraud. (Exhibit E).

Jamaal Cameron's criminal history includes four convictions of felony uttering and publishing. (Exhibit E).

Matthew Saunders' criminal history includes convictions of felony armed robbery, felony home invasion (1st degree), felony unlawful driving away of a motor vehicle, felony receiving/concealing stolen property, felony breaking and entering a vehicle (multiple convictions).

Richard Briggs' criminal history includes convictions of felony receiving and concealing stolen property (multiple convictions), felony attempted unlawful driving away of a motor vehicle (multiple convictions). (Exhibit E).

Michael Bates' criminal history includes convictions of misdemeanor larceny, felony larceny from a motor vehicle and felony receiving/concealing stolen property. (Exhibit E).

Michael Cameron's criminal history includes convictions of felony receiving and concealing stolen property (multiple convictions) and felony unlawful driving away of a motor vehicle (multiple convictions). (Exhibit E).

Attached as Exhibit E is summary of affiants' criminal histories demonstrating their lack of credibility and corresponding issues with the Court relying on statements made by these individuals who have shown their propensity to repeatedly engage in dishonest acts.

Certainly, one could wonder if these career criminals are not simply looking for a "get-out-of-jail-free" card.

II. The Opinion and Order

This Motion seeks reconsideration of the Court's Opinion and Order dated April 17, 2020 granting Plaintiff's Motion for Temporary Restraining Order and ordering Defendants to take measures in preparation of the TRO hearing related to members of the "Medically-Vulnerable Subclass" identified in Plaintiff's Complaint. The instant motion is brought pursuant to Fed.R.Civ.P. 59(e) which permits a motion to alter or amend a judgment to be filed within 10 days after entry of the judgment.

The Supreme Court has noted that Fed.R.Civ.P. 59(e) was adopted "to mak[e] clear that the district court possesses the power to rectify its own mistakes in the period immediately following entry of judgment." *White v New Hampshire Dep't of Employment Sec.*, 455 U.S. 445, 450; 102 S.Ct. 1162, 1166, 71 L.Ed.2d 325 (1982) (internal quotations omitted); *see also Ray E. Friedman & Co. v Jenkins*, 824 F.2d 657, 660 (8th Cir. 1987). Such a motion is therefore appropriate in cases where the court has based an order on a factual error.

Norman v Arkansas Dep't of Education, 79 F.3d 748, 750 (8th Cir. 1996). "The

purpose of Rule 59(e) is “to allow the district court to correct its own errors, sparing the parties and appellate courts the burden of unnecessary appellate proceedings.” *Howard v United States*, 533 F.3d 472, 475 (6th Cir. 2008) (quoting *York v Tate*, 858 F.2d 322, 326 (6th Cir. 1988)).

Eastern District of Michigan Local Rule 7.1(g) provides the standards for a motion for reconsideration:

[T]he court will not grant motions for rehearing or reconsideration that merely present the same issues ruled upon by the court, either expressly or by reasonable implication. The movant must not only demonstrate a palpable defect by which the court and the parties have been misled but also show that correcting the defect will result in a different disposition of the case.

“Palpable defect” has been defined as “a defect which is obvious, clear, unmistakable, manifest, or plain.” *Chrysler Realty Co., LLC, v Design Forum Architects, Inc.*, 544 F.Supp.2d 609, 618 (2008).

A. The Court Erred When It Determined Plaintiffs Have a Strong Likelihood of Success on the Merits

In order to grant a TRO, the Court must consider (1) whether the movant has a strong likelihood of success on the merits, (2) whether the movant would suffer irreparable injury absent a stay, (3) whether granting the stay would cause substantial harm to others, and (4) whether the public interest would be served by granting the stay. *Ohio Republic Party v Brunner*, 543 F3d 357, 361 (6th Cir.2008).

Where a prison inmate seeks an order enjoining prison officials, this Court is required to proceed with the utmost care and must recognize the unique nature of the prison setting. *Orum v Michigan Dep't of Corrections*, 2018 WL 8369471 *11 (W.D. Mich, December 11, 2018)(citing *Kendrick v. Bland*, 740 F.2d 432 at 438, n.3, (6th Cir. 1984); *Harris v. Wilters*, 596 F.2d 678 (5th Cir. 1979)). In the context of the prison administration, “the interests of identifiable third parties and the public at large weigh against the granting of an injunction. Any interference by the federal courts in the administration of ... prison matters is necessarily disruptive.” The Sixth Circuit has noted:

It is fundamental that the federal forum, as the ultimate guardian of constitutional rights, possesses the authority to implement whatever remedy is necessary to rectify constitutionally infirm practices, policies or conduct.... This broad, equitable authority, however, is tempered by precepts of comity and federalism.... The restraints of federalism must be applied not only when an injunction is sought against the judicial branch of state government, but also when an injunction is urged “against those in charge of an executive branch of any agency of state or **local government**.”.... Thus the federal equity court in fashioning a remedy must afford relief which is “no broader than necessary to remedy the constitutional violation.” *Glover v Johnson*, 855 F2d 277, 286 (6th Cir.1988)(citations and quotations omitted).

* * *

Federal restraint into intrusion of a state penal institution is counseled for at least two reasons:

[J]udicial deference is accorded not merely because the administrator ordinarily will, as a matter of fact in a particular case, have a better grasp

of his domain than the reviewing judge, but also because the operation of our correctional facilities is peculiarly the providence of the Legislative and Executive Branches of our Government not the Judicial.

Kendrick v Bland, 740 F2d 432, 438 (6th Cir.1984)(quotations and citations omitted). See also, *Turner v Safley*, 482 US 78, 85 (1987)(“Where a... penal system is involved, federal courts have ... additional reason to accord deference to the appropriate prison authorities”); *Meachum v Fano*, 427 US 215, 229 (1976)(“Federal courts do not sit to supervise state prisons, the administration of which is of acute interest to the States”). Importantly, a court should assume that, absent an official policy or practice urging unconstitutional behavior, individual government officials will act constitutionally. *City of Los Angeles v Lyon*, 461 US 95, 102 (1983); *O’Shea v Littleton*, 414 US 488, 495-96 (1974).

1. Plaintiff’s Cannot Claim Eighth and Fourteenth Amendment Violations as Part of a Habeas Petition

In its Opinion and Order, the Court stated, “the Court finds that Plaintiffs are likely to succeed on the merits of their claim alleging that jail conditions violate their Eighth and Fourteenth Amendment rights.” (Opinion p. 3). The Court issued its Order without permitting or considering a response from Defendants and without affording any deference to defendant prison officials as required. Consequently, the Court proceeded to issue its Opinion which also failed to consider well established

precedent regarding the inability to file an Eighth/Fourteenth Amendment claim as part of a habeas petition¹.

In *Glaus v Anderson*, 408 F3d 382, 387-88 (7th Cir. 2005), plaintiff alleged defendant prison officials violated his Eighth Amendment rights. Specifically, plaintiff alleged defendants were deliberately indifferent to his serious medical needs which presented a potentially fatal situation. *Id* at 384. The district court denied plaintiff's habeas petition and the Seventh Circuit affirmed the district court holding:

Glaus's habeas corpus petition would be proper if release were among the possible remedies for an Eighth amendment deliberate indifference claim. Unfortunately for Glaus, it is not. If an inmate established that his medical treatment amounts to cruel and unusual punishment, the appropriate remedy would be to call for proper treatment, or to award him damages; release from custody is not an option...

[Glaus's claim] must be brought as either a civil rights claim or possibly a Federal Tort Claims Act claim against the United States or an Administrative Procedures Act challenge[.]

The Sixth Circuit has also held that an inmate may not challenge the conditions of confinement in a habeas petition. *In re Owens*, 525 Fed. App'x 287, 290 (6th Cir.2013). Similarly, in *Burton v McGlasson*, No. 2:14-CV-10693, 2014 WL 700503 (E.D. Mich. Feb. 24, 2014), this Court dismissed plaintiff's habeas petition when plaintiff's petition challenged the conditions of confinement. This Court noted:

¹ Defendants are in the process of preparing a Motion to Dismiss in lieu of Answer to Plaintiffs' Petition pursuant to Fed. R. Civ. P. 12(b)(6).

Where a prisoner is challenging the very fact or duration of his physical imprisonment and the relief that he seeks is a determination that he is entitled to immediate release or a speedier release from that imprisonment, his sole federal remedy is a petition for writ of habeas corpus. *Preiser v. Rodriguez*, 411 U.S. 475, 500, 93 S.Ct. 1827, 36 L.Ed.2d 439 (1973). However, habeas corpus is not available to prisoners who are complaining only of mistreatment during their legal incarceration. See *Lutz v. Hemingway*, 476 F.Supp.2d 715, 718 (E.D.Mich.2007). Complaints like the ones raised by petitioner which involve conditions of confinement “do not relate to the legality of the petitioner's confinement, nor do they relate to the legal sufficiency of the criminal court proceedings which resulted in the incarceration of the petitioner.” *Id.* (quoting *Maddux v. Rose*, 483 F.Supp. 661, 672 (E.D.Tenn.1980)). **A petition for writ of habeas corpus is not the proper vehicle for a prisoner's claim that prison officials have been deliberately indifferent to his medical needs, because release from custody is not an available remedy for a deliberate indifference claim.** See *In re Owens*, 525 Fed. App'x 287, 290 (6th Cir.2013); *Glaus v. Anderson*, 408 F.3d 382, 387 (7th Cir.2005); *Hamilton v. Gansheimer*, 536 F.Supp.2d 825, 841–42 (N.D. Ohio 2008). An inmate like petitioner should therefore bring his medical indifference claim as a civil rights complaint. *Glaus*, 408 F.3d at 386–87. Because petitioner challenges only the conditions of his confinement, his claims “fall outside of the cognizable core of habeas corpus relief.” See *Hodges v. Bell*, 170 Fed. App'x 389, 393 (6th Cir.2006).

Id. at *1 (emphasis supplied). See also, *Martin v Zych*, 2009 WL 398166 (E.D. Mich. Feb. 17, 2009) (holding “petition for writ of habeas corpus is not the proper vehicle for a prisoner's claim that prison officials have been deliberately indifferent to his medical needs, because release from custody is not an available remedy for a deliberate indifference claim”); *Davis v Zych*, 2009 WL 1212489 (E.D. Mich. May 4, 2009) (“[C]laims concerning the conditions of confinement are not cognizable in

a habeas action brought pursuant to 28 U.S.C. §§ 2241 or 2254"); *Crites v Madison County Jail*, 2018 WL 1832919 at *2 (dismissing habeas petition on preliminary review holding deliberate indifference claim was non-cognizable) and *Peterson v Diaz*, 2020 WL 1640008 (E.D. Cal. April 2, 2020)(holding habeas proceedings not appropriate vehicle to raise Eighth Amendment claims related to COVID-19 pandemic).

Here, Plaintiffs have done exactly what has been routinely rejected by numerous federal courts including the Sixth Circuit. *In re Owens, supra*. Plaintiffs have filed a Petition for Habeas Corpus that alleges Eighth and Fourteenth Amendment violations relating to the conditions and confinement of the Oakland County Jail. Unfortunately for Plaintiffs, a habeas petition is not the proper mechanism for challenging conditions and confinement of incarceration. As this Court has previously noted, “A petition for writ of habeas corpus is not the proper vehicle for a prisoner's claim that prison officials have been deliberately indifferent to his medical needs, because release from custody is not an available remedy for a deliberate indifference claim.” Consequently, Plaintiffs cannot show any likelihood of success with regard to their habeas petition as required in order to grant a TRO regarding same. *Chrysler Realty Co., LLC, supra*.

2. Plaintiffs’ Cannot Establish Defendants Are Recklessly Disregarding The Risk Posed by COVID-19

The United States Supreme Court has held, “the treatment a prisoner receives in prison and the conditions under which he is confined are subject to scrutiny under the Eighth Amendment.” *Helling v McKinney*, 509 US 25, 31; 113 S Ct 2475 (1993). In regard to an inmates conditions of confinement, the Supreme Court noted that jail conditions may be “restrictive and even harsh.” *Rhodes v Chapman*, 452 US 337, 347; 101 S Ct 2392 (1981). It is well settled that pursuant to the Eighth Amendment of the United States Constitution, a prison official must “take reasonable measures to guarantee the safety of the inmates.” *Hudson v Palmer*, 468 US 517, 526-527; 104 S Ct 3194 (1984). To raise a cognizable constitutional claim for deliberate indifference to an inmate's safety, an inmate must make a two-part showing: (1) the alleged mistreatment was objectively serious; and (2) the defendant subjectively ignored the risk to the inmate's safety. *Farmer v Brennan*, 511 U.S. 825, 834; 114 S.Ct. 1970 (1994).

In regard to the second element discussed above, the United States Supreme Court has held that in order for a plaintiff to be successful in his deliberate indifference claim, he must show the prison official possessed a state of mind “more blameworthy than negligence.” *Id.* The *Farmer* Court also noted that “acting or

failing to act with deliberate indifference to a substantial risk of serious harm to a prisoner is the equivalent of recklessly disregarding the risk.” *Id.* Importantly, the reckless standard is not one of objectivity. *Id.* at 837-838. Instead, a plaintiff must show the prison officer “consciously disregarded,” a substantial risk of harm. *Id.* at 839. The Sixth Circuit has likewise acknowledged that a plaintiff must show defendant subjectively ignored a risk that was objectively serious. *Leary v Livingston County*, 528 F.3d 438, 442 (6th Cir.2008). The prison official's state of mind must evince “deliberateness tantamount to intent to punish.” *Miller v. Calhoun Cty.*, 408 F.3d 803, 812–13 (6th Cir. 2005) (citing *Horn v. Madison County Fiscal Court*, 22 F.3d 653, 660 (6th Cir.1994)). “[A]n official's failure to alleviate a significant risk that he should have perceived but did not, while no cause for commendation, cannot under our cases be condemned as the infliction of punishment.” *Farmer*, 511 U.S. at 838, 114 S.Ct. 1970.

Deliberate indifference claims are the **same** under the Eighth and Fourteenth Amendments. *Ford v Cnty of Grand Traverse*, 535 F.3d 483, 494-95 (6th Cir.2008); *Hanner v City of Dearborn Heights*, 450 Fed Appx 440, 447 (6th Cir.2011) (“Similar rights are guaranteed to pretrial detainees by the Due Process Clause of the Fourteenth Amendment, which provides the same deliberate indifference standard of care as the Eighth Amendment”), *Goebert v Lee County*, 510 F.3d 1312, 1326 (11th

Cir.2007) (“the standards under the Fourteenth Amendment are identical to those under the Eighth.”).

Plaintiffs cannot show that Defendants have been deliberately indifferent to their needs and thus are unable to show a strong likelihood of success on the merits of their Eighth and Fourteenth Amendment claims because the overwhelming evidence establishes Defendants previously put into place nearly all of the requirements of the Court’s TRO at the jail. Although each individual reacts differently to the virus, fortunately no inmate has been admitted to a hospital due to COVID-19 related symptoms and no inmate has died as a result of COVID-19. The individual components of the Court’s TRO will be addressed separately below.

A. Liquid Hand Soap/Disinfectant Products

Prior to the Court’s Order, OCJ practices included providing hand soap in all cells. (Exhibit Exhibit B, ¶ 5). Two bars of soap are provided to inmates two times per week. (Exhibit B, ¶ 5). Additionally, jail personnel provide disinfectant products (“DMQ”) when requested and no less than three times per day to each cell in the jail. (Exhibit B, ¶ 6).

B. Hand Sanitizer

Defendants do not allow for inmates to possess hand sanitizer and vehemently object to any order regarding same. The OCJ previously provided

inmates with access to sanitizer. (Exhibit B, ¶ 18). Unfortunately, on October 23, 2019, a serious incident occurred involving inmates making alcoholic drinks from hand sanitizer. (Exhibit B, ¶ 18; Exhibit D Incident Report). As a result, several inmates became ill including one inmate who became unresponsive and required hospitalization. (Exhibit D, p. 28). Consequently, any future release of hand sanitizer potentially places inmates at a serious risk to their own health and safety. In addition, because Defendants are on notice of same, they potentially face exposure and liability in the form of a substantive due process claim to the extent an inmate becomes ill due to Defendants providing hand sanitizer to them.

C. Access to Showers/Clean Laundry

Inmates in the main jail receiving area are given showers three times per week. (Exhibit B, ¶ 5). Inmates in the annex have daily access to showers. (Exhibit B, ¶ 5). Inmates are given clean laundry once per week. (Exhibit B, ¶ 8).

D. PPE for Jail Staff

All jail personnel have been issued masks and gloves. (Exhibit B, ¶ 12). Additionally, N95 masks and face shields have been issued to correctional staff who have contact with inmates who have testified positive for COVID-19. (Exhibit B, ¶ 12).

E. Jail Staff Hygiene Efforts

Defendants have taken steps to ensure jail personnel wash their hands with soap and water both before and after touching any person or surface in cells or common areas. (Exhibit B, ¶ 24). This includes signs posted throughout the Jail for all personnel to observe. (Exhibit B, ¶ 24). Jail personnel have access to both soap and water to be used at their disposal. (Exhibit B, ¶ 24).

F. Protocol to Report Symptoms

With regard to inmates' communication with medical staff, sick call slips are distributed to the inmates daily and picked up every morning by medical staff. (Exhibit F, ¶ 3). Sick call slips are the protocol for inmates to self-report COVID-19 symptoms. (Exhibit F, ¶ 3). Individuals who are displaying COVID-19 symptoms are seen daily by the medical staff and assessed accordingly. (Exhibit F, ¶ 3). A full set of vitals is taken once per day. (Exhibit F, ¶ 3). Temperature is taken by the day, afternoon and midnight medical shifts and therapeutics are administered as needed. (Exhibit F, ¶ 3).

G. Testing of COVID-19

Defendants have and continue to test all inmates who displays known symptoms of COVID-19. (Exhibit F, ¶ 15). As of April 18, 2020, 242 COVID-19 tests have been administered to inmates through swab testing. (Exhibit F, ¶ 15). Of the 242 tests performed, only 36 inmates have tested positive for COVID-19. (Exhibit

F, ¶ 15). Five (5) of the positive inmates have been released from custody, seven (7) recovered and returned to general population and 24 remain quarantined in the pod designated for COVID-19 positive inmates. (Exhibit F, ¶ 15).

H. Adequate Spacing

With regard to social distancing, the CDC guidelines expressly recognize the impracticality of providing six (6) feet of spacing for *social distancing* in correctional facilities. (Exhibit B, ¶ 3) And, recognizing the guidelines provide that the six (6) foot spacing strategy has to “...be tailored to the individual space in the facility...” (Exhibit B, ¶ 3) The OCSO has implemented several CDC strategies to reduce COVID-19 transmission by, 1) limiting recreational activities, 2) providing outside catered meals in the housing units or cells, 3) suspending group programs and 4) reducing the number of inmates in group cells where room and classification permit. (Exhibit B, ¶ 3). In addition, the OCSO closed one pod to provide for overflow of newly arrested inmates to allow them fourteen (14) days quarantine, together with the separation of these new inmates into pairs of two. (Exhibit B, ¶ 3) Extraordinary efforts have been made to both reduce overall jail occupancy as well as reduce the number of inmates in group cells. (Exhibit B, ¶ 3) Jail occupancy in joint cells has been reduced by 56%. The remaining jail population consists of single and double cell occupancy. (Exhibit B, ¶ 3).

I. Quarantine of Positive Cases

Inmates who test positive are immediately quarantined from other inmates. (Exhibit B, ¶ 4). There is one specific pod in the jail that has been designated for COVID-19 positive inmates only. (Exhibit B, ¶ 4). These inmates have access to showers, mental health services, reading materials, phone and video calling, communications with counsel and personal property. (Exhibit B, ¶ 4). Inmates who are positive for COVID-19 remain in quarantine for 14 days. (Exhibit B, ¶ 4).

J. Response To Emergencies within an Hour

All medical emergencies receive immediate response from jail personnel. (Exhibit F, ¶ 6).

K. Disinfecting Supplies

See subparagraph (A) above.

L. Communication Regarding COVID-19

Communication including written postings have been posted and/or distributed throughout the Jail. (Exhibit B, ¶ 17; Exhibit C). The communications advise inmates of the steps taken by jail personnel as it pertains to COVID-19. (Exhibit B, ¶ 17). The posting was posted throughout the jail as early as March 11, 2020 and prior to any confirmed cases inside the jail. (Exhibit B, ¶ 17). Medical staff, including a doctor or nurse practitioner, are visiting each housing area Monday-Friday at which time they

are constantly interacting with the inmate population and providing lengthy verbal education regarding the importance of self-reporting COVID-19 symptoms. (Exhibit F, ¶ 4).

M. Training of Staff

Signs are posted throughout the facility reminding jail personnel they are required to wash their hands with soap and water as frequently as possible. (Exhibit B, ¶ 24). The signs also instruct the staff on the proper method and manner to wash their hands. (Exhibit B, ¶ 24). Additionally, as noted above, each housing area is visited by a doctor or nurse practitioner Monday-Friday. (Exhibit F, ¶ 4).

N. Medical Co-Pays

Defendants have waived all charges related to medical co-pays related to COVID-19 related symptoms and/or treatment which includes testing of same. (Exhibit B, ¶ 23).

O. Waiver of charges for Medical Grievances

Defendants have waived charges related to medical grievances during the pandemic. (Exhibit B, ¶ 22).

P. Punitive Transfers/Retaliation

Defendants have never engaged in punitive transfers or threats of transfers to areas of the jail that have higher infection rates for any infraction. (Exhibit B, ¶ 10,

15). As indicated above, inmates who have tested positive are quarantined in a pod that is separate from all those who are not positive for COVID-19. (Exhibit B, ¶ 4).

Q. CDC Recommendations

On March 23, 2020, the Center for Disease Control (“CDC”) issued “Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correction and Detention Centers. (ECF 17 Pg. ID 166, Pgs. 1- 27) Recognizing it is neither feasible nor practical to implement all recommendations, the CDC expressly authorizes Correction and Detention Centers to implement the recommendations according to the “specific needs of...” their facility. *Id pg. 4 of 27*. This guidance encompasses, among other things, “Prevention” and “Management” of the Covid-19 virus in the inmate population.

CDC “Prevention” guidelines are intended to assist facilities in preventing the spread of the virus from outside the facility to inside the facility.

CDC “Management” guidelines are intended to assist facilities in clinically managing confirmed and suspected COVID-19 cases inside the facility. *Id pg. 6 of 27*.

Sheriff Michael Bouchard and the Oakland County Sheriff’s Office (“OCSO”) had already implemented all feasible CDC recommendations relating to inmate safety long before the subject suit.

PREVENTION

Among the recommendations for prevention, the CDC suggest “Cleaning and Disinfecting Practices” be intensified. These recommendations include cleaning and disinfecting surfaces several times a day. *Id pg. 10 of 27*. Long before this suit was filed, the OCSO implemented new procedures requiring cleaning and disinfecting all surfaces identified in the CDC recommendation three (3) times a day. In accord with this new policy, all inmate Trustees and custodial staff clean common areas three (3) times a day with approved disinfectant products. Inmates are given all necessary cleaning supplies to clean their respective cells after each of their three (3) meal. In addition, they are advised that cleaning supplies are readily available and are encouraged to “use them as often as possible”. (Exhibit B, ¶ 5, 6, 19; Exhibit C).

In accord with the CDC recommendations to use “household cleaners and EPA-registered disinfectants effective against the virus that causes COVID-19” [*Id pg. 10 of 27*] the OCSO uses DMQ® a United States Environmental Protection Agency (“EPA”) EPA registered disinfectant. *Id.* (Exhibit G, EPA registration documentation).

In addition to the use of EPA registered cleaning agents, OCSO has also implemented Ultraviolet Germicidal Irradiation (UVGI) technology to supplement

cleaning in the jail environment. (Exhibit C). This technology has become routinely used in a variety of industries to combat COVID-19¹.

The OCSO has implemented the CDC recommendation for posting signage throughout the facility. (Exhibit C). In addition, Monday through Friday, each housing area in the facility is visited by a doctor or nurse practitioner at which time they are constantly interacting with the inmate population and providing lengthy verbal education regarding the importance of self-reporting COVID-19 symptoms. *Id* pgs. 11& 12 of 27; (Exhibit F, ¶ 4).

Inmates are given, free of charge, individual bar soap, running water and towels to wash frequently consistent with CDC recommendations. (Exhibit B, ¶ 5). While Plaintiffs would have the OCSO provide hand sanitizer to inmates, the CDC recognizes the inherent danger of inmate intoxication posed by giving inmates a product containing 60% or more alcohol by volume. This is why the CDC only recommends hand sanitizer if there is no “soap and water” available to the inmates and only if security concerns allow. *Id* pg. 8 of 27. The principal security concern for dispensing hand sanitizer to inmates is “inmate intoxication.” Mixing salt with hand sanitizer is known to convert the semi liquid sanitizer to a liquid form for ease of

¹ For example, see; Effects of Ultraviolet Germicidal Irradiation (UVGI) on N95 Respirator Filtration Performance and Structural Integrity, *J Occup. Environ Hyg.* 2015; 12(8): 509–517; N95 Filtering Facemask Respirator Ultraviolet Germicidal Irradiation (UVGI) Process for Decontamination and Reuse; Nebraska Medicine, *John J Lowe, Katie D Paladino, et al.*

consumption. In October of 2019, inmates were found to have consumed hand sanitizer mixed with rock salt, antifreeze and Kool Aid®. One of the seven (7) was found breathing but unresponsive, even to painful stimuli. (Exhibit D). He was lifted from his top bunk and immediately transported by ALS to the McLaren Oakland Emergency Department. (Exhibit D). Poison control advised the remaining six (6) were to be monitored over the next several hours. (Exhibit D).

In accord with CDC guidelines, the OCSO has implemented a new “pre-intake screening” practice which includes identifying new inmates with COVID-19 complaints and taking all new inmates’ temperature. *Id pg. 11 of 27*. Consistent with the guidelines, OCSO further segregates all new inmates for fourteen (14) days to determine if they develop COVID-19 symptoms or later test positive. *Id pg. 15 of 27*; (Exhibit B ¶ 3). The OCSO also provides all inmates as well as new arrestees with a letter explaining the concerns and policies governing COVID-19 protections in the jail. (Exhibit H).

The CDC guidelines expressly recognize the impracticality of providing six (6) feet of spacing for *social distancing* in correctional facilities. The guidelines provide that this strategy [six (6) foot spacing] will have to “...be tailored to the individual space in the facility...” and “[n]ot all strategies will be feasible in all facilities...” Consequently, the six (6) foot spacing is only one of several strategies that may be

considered for implementation. *Id* pg. 12 of 27. The OCSO has implemented several CDC strategies to reduce transmission by; limiting recreational activities, providing outside catered meals in the housing units or cells, suspending group programs and reducing the number of inmates in group cells where room and classification permit. *Id*; (Exhibit B, ¶ 3).

Long before the subject litigation, the OCSO closed one pod to provide for overflow of newly arrested inmates to allow them fourteen (14) days quarantine, together with the separation of these new inmates into pairs of two. (Exhibit B, ¶ 3). Extraordinary efforts have been made to both reduce overall jail occupancy as well as reduce the number of inmates in group cells. Jail occupancy in joint cells has been reduced by 56%. The remaining jail population consists of single and double cell occupancy. (Exhibit I]).

The OCSO began its efforts to prevent and managed against the spread of COVID-19 in compliance with CDC recommendations and as a part of its own independent policies long before this litigation².

2

In addition to the affidavits of Childs and Warren, attached as Exhibit M is the Affidavit of Sgt. Ryan Terry which sets forth the efforts to prevent COVID-19 transmission in the East Annex. The Court should be aware that the East Annex has not experienced a single positive case of COVID-19.

MANAGEMENT

Consistent with CDC guidelines, the OCSO has been “medically isolate[ing]” all inmates diagnosed with COVID-19 [*Id pgs. 16 of 27*], and “quarantine[ing]” all inmates with any symptoms of COVID-19 [*Id pgs.20 of 27*] regardless of their status in the jail³. All medically isolated or quarantined inmates remain in their cohort until CDC related criteria have been met or they are eligible for release⁴. *Id pgs. 18 & of 27*. Simply put, OCSO has taken extraordinary efforts to comply with the available CDC guidelines at a time of national pandemic. As such, the Court’s determination that Plaintiffs’ have shown a strong likelihood of success contained a palpable defect and should be reversed.

III. This Court Lacks Authority to Enter An Order Releasing Inmates From Oakland County Jail

In regard to a prisoner’s claims regarding conditions and confinement while incarcerated, the United States District Court for the Western District of Michigan recently noted:

The United States Supreme Court has explained that “[f]ederal law

³ The CDC recognizes that Correctional and Detention facilities often lack the physical ability to provide single cell locations for medical isolation and/or quarantine. Consequently, the CDC provides that confirmed COVID cases can be “medically isolated” as a “...cohort, in a large, well ventilated cell with solid walls but without a solid door. *Id pgs. 16 of 27*. Quarantined inmates can be maintained in as a “...cohort in a multi person cell without a solid wall or solid door...” *Id pgs. 21 of 27*

However, it is not feasible to obtain two (2) negative tests in 24 hours pursuant to guidelines because of the unavailability of test kits.

opens two main avenues to relief on complaints related to imprisonment: a petition for habeas corpus, 28 U.S.C. § 2254, and a complaint under the Civil Rights Act of 1987, Rev. Stat. § 1979, as amended, 42 U.S.C. § 1983." *Muhammad v. Close*, 540 U.S. 749, 750 (2004) (per curiam). Causes of action arising from the conditions and circumstances of confinement are brought through claims under § 1983 and are subject to various procedures and consequences set forth in the Prison Litigation Reform Act (PLRA). See *id.*; *Moran v. Sondalle*, 218 F.3d 647, 649 (7th Cir. 2000) (per curiam). Challenges to the validity and duration of a conviction are brought through habeas applications and are subject to different procedures and consequences set forth in the Antiterrorism and Effective Death Penalty Act (AEDPA). See *Muhammad*, 540 U.S. at 750; *Moran*, 218 F.3d at 649. Because the requirements for the two types of lawsuits are different, the Seventh Circuit explained that it was "important to classify [the] cases correctly." *Moran*, 218 F.3d at 649.

The Seventh Circuit also noted that prisoners "may be tempted to choose one route rather than another to avoid" the various procedures and consequences set forth in the two statutes. *Moran*, 218 F.3d at 649. A "hybrid" action involving both types of claims "presents significant problems and courts must be on guard for attempts to use § 1983" to avoid the restrictions contained in the AEDPA. *Spencer v. Barret*, No. 14-10823, 2015 WL 4528052, at *4 (E.D. Mich. July 27, 2015). Where prisoners have sought to bring a hybrid habeas and civil rights claims, courts have directed the prisoners to file separate actions. See, e.g., *Kirk v. Jablonski*, No. 18-cv-288, 2019 WL 1283009, at *1 (D.N.M. Mar. 20, 2019).

Dunbar v. Rozen, No. 1:18-CV-617, 2019 WL 3213757, at *2 (W.D. Mich. July 17, 2019) (attached as Exhibit J).

1. The Conditions of the PLRA Are Not Satisfied

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e, incorporates

the provisions of 18 U.S.C. § 3626, titled “appropriate remedies with respect to prison conditions.” Pursuant to this section, “prospective relief in any civil action with respect to prison conditions shall extend no further than necessary to correct the violation of the Federal right of a particular plaintiff or plaintiffs.” 18 U.S.C. § 3626(a)(1). Courts are instructed “to give substantial weight to any adverse impact on public safety or the operation of the criminal justice system caused by the relief.” *Id.* “Civil action with respect to prison conditions” is defined as “any civil proceeding arising under Federal law with respect to the conditions of confinement and the effects of actions by government officials on the lives of persons confined in prison” but explicitly “does not include habeas corpus proceedings challenging the fact or duration of confinement in prison.” 18 U.S.C. § 3626(a)(2).

Importantly, the PLRA sets forth procedures for consideration of a “prisoner release order.” 18 U.S.C. § 3626(a)(3). A “prisoner release order” includes “any order, including a temporary restraining order or preliminary injunctive relief, that has the purpose or effect of reducing or limiting the prison population, or that directs the release from or nonadmission of prisoners to a prison.” 18 U.S.C. § 3626(g)(4). **A court may not enter a “prisoner release order” unless it “has previously entered an order for less intrusive relief that has failed to remedy the deprivation of the Federal right sought to be remedied” and “the defendant has had a reasonable**

amount of time to comply with the previous court orders.” 18 U.S.C. § 3626(a)(3)(i)-(ii). Once these conditions have been satisfied, only a three-judge panel can consider and issue a “prisoner release order” once it has determined by clear and convincing evidence that “crowding is the primary cause of the violation of a Federal right” and “no other relief will remedy the violation.” 18 U.S.C. § 3626(a)(3)(E)(i)-(ii); *Brown v Plata*, 563 US 493, 512 (2011); *Money v Pritzker*, - - - F. Supp. 3d - - - , 2020 WL 1820660 (N.D. Ill, April 10, 2020).

Courts have routinely denied plaintiffs request for a prison release order due to concerns related to COVID-19 in accordance with the conditions set forth in the PLRA. In *Money, supra*, the court denied plaintiffs’ request to be released from the Illinois Department of Corrections due to alleged concerns regarding the inmates’ safety and wellbeing during the COVID-19 pandemic. *Id* at *1. In its Opinion and Order denying plaintiffs’ requested relief, the court held:

The upshot is that the PLRA prevents this Court from granting the temporary restraining order on the Section 1983 claim, for a number of reasons. First, the statute provides that “no court shall enter a prisoner release order unless * * * a court has previously entered an order for less intrusive relief that has failed to remedy the deprivation of the Federal right,” and the defendants have “had a reasonable amount of time to comply with the previous court orders.” 18 U.S.C. § 3626(a)(3)(A)(i), (ii). Here, there is no such “previous court order[].” *Id*. Second, the statute provides that “only” a “three-judge court” can enter a prisoner release order. 18 U.S.C. § 3626(a)(3)(B). **So, this Court, standing alone, lacks the authority to issue any order that has the “purpose**

or effect of reducing or limiting the prison population.” *Id.*; 18 U.S.C. § 3626(g)(4).

Id at *14 (emphasis supplied).

Similarly, in *Coleman & Plata v Newsom*, 2020 WL 1675775 (E.D. Cal April 4, 2020), plaintiffs sought an order directing the Governor of California and other state officials to release categories of inmates who were low-risk, non-violent and/or close to their release dates and to “release or relocate inmates who, because of their age or other medical conditions, are at a high risk of developing a severe form of COVID-19.” *Id* at *3. In denying plaintiffs’ request, the court noted plaintiffs could not satisfy the PLRA’s “prior order requirement because there have not yet been any orders requiring Defendants to take measures short of release to address the threat of the virus; nor have Defendants had a reasonable time to comply.” *Id* at *4.

Just as in *Money* and *Coleman*, *supra*, the PLRA is implicated in the instant case because Plaintiffs’ Petition for Habeas Corpus seeks a “prisoner release order.” Specifically, Plaintiffs’ Petition for Habeas Corpus requests an order to “release all Medically Vulnerable Petitioners/Plaintiffs and Subclass Members of transferring them to home confinement.” (Plaintiff’s Petition, p. 67). Also similar to *Money* and *Coleman*, Plaintiffs’ request has no legal support and similarly has no likelihood of success. Prior to Plaintiffs’ habeas petition, no court has ever entered an order for

“less intrusive relief.” 18 U.S.C. 3626(a)(3)(A)(i); *Gillette v Prosper*, 858 F3d 833, 837 (3d Cir. 2017). Just as the *Money* court held when facing concerns related to COVID-19, “there is no such ‘previous court order.’” *Money*, at *14. Because no prior order has been entered, it is impossible for Plaintiffs to show that Defendants had a “reasonable amount of time to comply with the prior court orders.” *Id*; 18 U.S.C. 3626(a)(3)(A)(ii). Thus, Plaintiffs cannot show that either requirement of the PLRA is satisfied. Moreover, even if Plaintiffs could show the requirements were satisfied, this Court alone would not have the authority to order release of Plaintiffs or any other inmates of Oakland County Jail. Instead, a three judge panel would need to consider the requested “prisoner release order” after making a determination that there is clear and convincing evidence that “crowding” is the primary cause of constitutional violation and no other relief is sufficient. 18 U.S.C. § 3626(a)(3)(E)(i)-(ii). Simply put, just as the *Money* court held, “this Court, standing alone, lacks the authority to issue any order that has the ‘purpose or effect of reducing or limiting the prison population.’” Therefore, to the extent the Court’s Opinion and Order contemplated possible release of Plaintiffs and/or other inmates at Oakland County Jail (see Opinion and Order p. 7), it contained a palpable defect and was inconsistent with established authority. Consequently, the Order should be reconsidered and set aside.

IV. Plaintiffs' Have Failed to Exhaust Required Available State Remedies

In addition to the PLRA precluding Plaintiffs' request for release, their petition for writ of habeas corpus has no likelihood for success because Plaintiffs failed to exhaust the requisite available state remedies prior to filing the instant action.

Pursuant to 28 U.S.C. § 2254(b)(1):

An application for writ of habeas corpus on behalf of a person in custody pursuant to the judgment of a State court shall not be granted unless it appears that - (A) the applicant has exhausted the remedies available in the courts of the State; or (B)(i) there is an absence of available State corrective process; or (ii) circumstances exist that render such process ineffective to protect the rights of the applicant.

See also, *O'Sullivan v Boerckel*, 526 US 838, 845 (1999). The exhaustion requirement "serves to minimize friction between our federal and state systems of justice by allowing the State an initial opportunity to pass upon and correct alleged violations of prisoners' federal rights. *Duckworth v Serrano*, 454 US 1, 3 (1981). Moreover, the Sixth Circuit has held, "[A] federal habeas petitioner "must first exhaust the remedies available in state court by fairly presenting his federal claims before the state court; the federal court will not review unexhausted claims." *Irick v Bell*, 565 F3d 315, 323 (6th Cir.2009)(citations and quotations omitted). " A federal court will not review claims that were not entertained by the state court due to ... the petitioner's failure to raise those claims in the state courts while state remedies were

available....” *Id* at 323-324 (citations and quotations omitted). This includes presentation of the claims to the state appellate courts where review is discretionary and part of the ordinary appellate procedure in the state. *O’Sullivan*, 526 US at 847. “Where state remedies remain available to the habeas petitioner who has not fairly presented his constitutional claim(s) to the state courts, the exhaustion doctrine precludes a federal court from granting him relief on that claim,..” *Perruquet v Briley*, 390 F3d 505, 514 (7th Cir. 2004).

The *Money*, *supra*, the court applied the exhaustion requirements to a situation involving plaintiffs who sought release due to concerns related to the COVID-19 pandemic. In *Money*, the court dismissed plaintiffs’ habeas petition holding that plaintiffs’ failed to raise their claims in the state courts. The court noted that the state courts were available for emergency matters. *Id* at *21. Notably, the court held, “[T]o be sure, exhaustion requirements can (and should) be waived when relief is truly unavailable. But waiving them here - when state courts clearly were available...would turn the habeas system upside down.” *Id* at *22.

Just as in *Money*, Plaintiffs in the instant action attempt to “turn the habeas system upside down” through their blatant disregard of available state remedies. *Id*. Plaintiffs have not and cannot show that they pursued their claims in any state court prior to filing the instant action. This alone is fatal to Plaintiffs’ habeas petition. 28

U.S.C. § 2254(b)(1); *Irick, supra*. While it is anticipated Plaintiffs may argue that the state courts in Michigan are not available, this argument is without merit. The Oakland County Circuit Court has entered multiple orders indicating it remains available to handle “emergency matters.” (See Exhibit K, Oakland County Court Administrative Order, “[T]his Order is amended to continue emergency procedures...”). The Oakland County Circuit Court’s Order is consistent with the Michigan Supreme Court’s Administrative Order dated March 15, 2020 which states, “Trial Courts may adjourn...any criminal matters where the defendant is not in custody; where a criminal defendant is in custody, trial courts should expand the use of videoconferencing when the defendant consents.” (Exhibit L, Order). Indeed, Oakland County Circuit Court remains available to handle non-emergency matters as well. (See Exhibit K, “[N]on-emergency matters may be heard by audio or video conferencing...”). Simply put, Oakland County Circuit Court, and the available appeals court in Michigan remain available to hear emergency and non-emergency related issues. Despite the availability of the state courts, Plaintiffs failed to raise their claims in state court prior to filing the instant action. Therefore, Plaintiffs habeas petition contains a significant procedural defect and has no likelihood of success as required in order for the Court to enter a TRO. Once again, to the extent the Court’s TRO contemplates release of Plaintiffs and/or any subclass of same from Oakland

County Jail, it contains a palpable defect and should be reconsidered and ultimately set aside.

V. Closing Comments

Of course, Plaintiffs' counsel knows that neither this Court nor the Oakland County Sheriff has the authority to release inmates once detained in the jail. Had Plaintiff's counsel reached out in good faith to Sheriff Bouchard or his representatives they would have discovered the Sheriff's department had already undertaken to seek compassionate releases of inmates considered at risk. Plaintiffs' could have disclosed to this court and to the media in their press release that in March of this year, before any inmate tested positive for COVID-19, Sheriff Bouchard directed Major Charles Snarey to compile a list of medically vulnerable inmates to be evaluated for compassionate release. On March 30, 2020, the nursing staff prepared letters for submission to various Oakland County judges seeking the release of some inmates considered "at risk". For reasons known only to the respective judges, some but not all "at risk" patients were released from the jail by court order. This information is being compiled and will be submitted to the court in a subsequent brief. Sheriff Bouchard is continuing to evaluate all new arrestees who have been housed in the jail since the original evaluation. Those deemed appropriate will be referred to the appropriate judge to be considered for compassionate release.

Finally, Defendants would be remiss if they did not address the immediate negative consequences of this Court entering its TRO late Friday afternoon. Almost immediately upon entry of the Order, Plaintiffs' attorneys issued a press-release regarding the Order and throughout the course of the weekend missed no opportunity to defame Sheriff Bouchard. As this Court can see from the extensive evidence presented in this Brief, the Court's conclusion that "Oakland County has not imposed even the most basic safety measures recommended by health experts..." could not be further from the truth. As a result, Plaintiffs' attorneys disparaging comments in the media regarding Sheriff Bouchard are outrageous and one could argue are politically motivated.

It is anticipated that Plaintiffs' attorneys might argue that there was no damage to Sheriff Bouchard by the entry of the TRO because he is already executing the specific provisions of the TRO. However, this would be a disingenuous argument at best. The actions of the Plaintiffs' attorneys over the weekend have the potential of causing significant damage to the trust that exists between Sheriff Bouchard and the residents of Oakland County whom Sheriff Bouchard has served as their Sheriff for over 20 years. Sheriff Bouchard has received numerous national awards recognizing his excellence in serving as Oakland County Sheriff. In addition, and perhaps most important in today's political environment, he has served the County without any hint

of impropriety or public scandal. Finally, as the Court can see from the evidence set forth in this Brief, his actions in light of the COVID-19 crisis have saved lives and not risked lives. Not a single Oakland County inmate has had the need to be hospitalized, nor has an Oakland County inmate died as a result of COVID-19 exposure.

Where does Sheriff Bouchard go to reclaim his reputation in today's Twitter/Instagram/Facebook driven society?

RELIEF REQUESTED

WHEREFORE, Defendants respectfully request that this Honorable Court rescind its April 17, 2020, Opinion and Order granting Plaintiffs' Motion for Temporary Restraining Order and scheduling a hearing for April 24, 2020 wherein Defendants are required to take measures prior to the hearing regarding the identity of "class members" for the reasons set forth above.

Respectfully submitted,

POTTER DeAGOSTINO O'DEA & CLARK

s/ STEVEN M. POTTER (P33344)

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Dated: April 20, 2020

CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2020, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record, and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: N/A.

/s/ STEVEN M. POTTER (P33344)
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EXHIBIT A

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Oakland County Jail sued by groups wanting inmates vulnerable to COVID-19 released

Published 1 day ago | Coronavirus in Michigan | FOX 2 Detroit

FOX 2 - Civil Rights groups filed a federal lawsuit, demanding the release of vulnerable inmates at Oakland County Jail.

They argue that inmates aren't being protected from COVID-19, and that for some, remaining behind bars could become a death sentence.

Oakland County Jail sued by groups wanting inmates vulnerable to COVID-19 released

Civil Rights and racial justice groups have sued the Oakland County Jail in federal court calling for the release of medically vulnerable inmates who could be in dire straits if they contract COVID-19.

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Man Who Called Rise of NVIDIA Doubles Down on Prediction

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"This is a dire situation," said Krithika Santhanam, attorney with

Advancement Project's national office. "If we don't act swiftly, folks will die. And that point can't be stressed enough."

Civil Rights and racial justice groups have sued the Oakland County Jail in federal court calling for the release of medically vulnerable inmates who could be in dire straits if they contract COVID-19.

"I'm concerned, I'm worried about my child because he can get infected and I know if he gets infected in there he's not going to get the proper care," said Teresa Drake, whose son is incarcerated. "My son has kidney damage and liver damage and from my understanding, he has high risk for corona virus."

The Oakland County Sheriff's office says several deputies and 31 inmates have tested positive for COVID-19.

The infected inmates are in quarantine. Those bringing the lawsuit say not enough is being done prevent an outbreak.

"The shared toilets and showers are filthy, filled with insects, dirt and clumps of hair," said Phil Mayor, ACLU attorney. "People have to sleep on concrete floor without bunks nearly cuddling each other. Next door, people who are being quarantined are held in the exact same conditions."

"Ultimately we don't think the Oakland County jail can do the single most important thing the CDC and medical experts have urged as the only way to protect from exposure and transmission which is social distancing," said Santhanam.

A federal judge issued a temporary restraining order Friday demanding certain protections for inmates be put in place within 10 days.

The sheriff's office says they've been doing everything the judge ordered, except for providing inmates with hand sanitizer.

"You know most hand sanitizer has 65 to 75 percent alcohol in it," said Undersheriff Michael McCabe, Oakland County Sheriff's Office. "We had hand sanitizer in several areas of the jail and we had to take it out. They were drinking the hand sanitizer. We had four inmates who became intoxicated."

McCabe says the jail sent the names of 29 inmates with underlying health conditions to district and circuit court judges to be released and 20 of them were.

He went on to say the jail, which has been on lockdown the past three weeks, is one of the cleanest in the Midwest. The kitchen was shut down and they are giving inmates bagged lunches to prevent the spread of COVID-19 and come Monday they are bringing in prepped meals for inmates at three times the cost of their normal food service.

"We're working diligently to make sure the facility is clean that they are receiving the medical care that they need," McCabe said, quipping, "for the attorneys who filed the lawsuit we've come up with a program called 'Adopt a con.' If they want, we can gladly turn them over and they can put them in their basement. how's that?"

The Oakland County Sheriff's Office says a few of its deputies who tested positive and went into quarantine were able to get back to work.

EXHIBIT B

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT

JAMAAL CAMERON; RICHARD
BRIGGS; RAJ LEE; MICHAEL
CAMERON; MATTHEW
SAUNDERS, individually and on
behalf of all others similarly situated,

Case 2:20-cv-10949-LVP-MJH

Plaintiffs,

v.

MICHAEL BOUCHARD, in his
official capacity as Sheriff of Oakland
County; CURTIS D. CHILDS, in his
official capacity as Commander of
Corrective Services; OAKLAND
COUNTY, MICHIGAN,

Defendants.

AFFIDAVIT OF CAPTAIN CURTIS CHILDS

Captain Curtis Childs, being first duly sworn, deposes and states:

1. That this Affidavit is made of my own personal knowledge and that if I am sworn to testify, I can give competent testimony of my own personal knowledge in support of each paragraph of this Affidavit regarding conditions at the main jail.
2. That I have been employed by the Oakland County Sheriff's Office ("OCSO") since January 22, 1992. At all times relevant to the instant action I have

worked as a Captain at the Oakland County Jail since August 24, 2013. Myself and Captain Molinar are the only direct reports to Major Charles Snarey who has overall responsibility for the jail.

3. With regard to social distancing, the CDC guidelines expressly recognize the impracticality of providing six (6) feet of spacing for *social distancing* in correctional facilities. And, recognizing the guidelines provide that the six (6) foot spacing strategy has to “...be tailored to the individual space in the facility...” the OCSO has implemented several CDC strategies to reduce COVID-19 transmission by;
 - a. limiting recreational activities,
 - b. contracted for outside catered meals in the housing units or cells,
 - c. suspending group programs and
 - d. reducing the number of inmates in group cells where room and classification permit.
 - e. Continued and increased usage of UVI technology to supplement jail cleaning.

In addition, the OCSO closed one pod to provide for overflow of newly arrested inmates to allow them fourteen (14) days quarantine, together with the separation of these new inmates into pairs of two. Extraordinary efforts have been made to both reduce overall jail occupancy as well as reduce the

number of inmates in group cells. Jail occupancy in joint cells has been reduced by 56%. The remaining jail population consists of single and double cell occupancy.

4. With regard to quarantine procedures, if an inmate tests positive, that inmate is transferred into a pod designated for COVID-19 individuals. If an inmate has significant symptoms of COVID-19, that inmate is transferred from their cell and put into an area designated as symptomatic pod. All inmates who had contact with someone who tests positive or has significant symptoms of COVID-19 are then placed into quarantine for 14 days. All quarantined inmates and inmates who have tested positive have access to showers, mental health services, reading materials, phone and video calling, communications with counsel and personal property. All inmates have been provided with a face mask.
5. With regard to the issue of soap, the jail does not have liquid soap. Inmates in the main jail receiving area are allowed to shower three times a week and are given soap when they shower. Additionally, two bars of soap are also provided to inmates in receiving area two times per week. In the main jail, the inmates receive two bars of soap two times per week. In the Annex, inmates are allowed to shower daily and soap is provided when they shower. In addition, inmates in the Annex receive two bars of soap twice per week. Furthermore,

the desk deputy in each housing area has extra boxes of soap that is available upon request.

6. With regard to disinfectant, the jail uses a product called DMQ. The jail only dilutes this product pursuant to the manufacturer's instruction. The product is machine mixed at the jail. DMQ is available to all inmates when requested and no less than three times per day. It is provided to the inmates with food delivery. Inmates are provided sponges and rags in order to use the DMQ. When inmates are transferred between cells, the cells are always disinfected before use by the transferring inmates.
7. With regard to food preparation and food delivery, food preparation inmates are provided masks and gloves. Food delivery inmates are also provided masks and gloves. These requirements existed before COVID-19.
8. With regard to laundry exchange, all inmates are provided fresh, clean laundry once per week.
9. With regard to laundry services, inmates performing laundry services are provided with gloves and masks and multiple clothing changes per day if requested. COVID-19 laundry is separated from laundry not suspected of COVID-19 contamination.
10. With regard to inmate grievances, including COVID-19 grievances, all corrections officers are instructed to not retaliate against an inmate who wants

to write out a grievance. All correctional staff are instructed to pass out grievance forms multiple times per day.

11. With regard to sinks and toilets contained within cells, cleaning is performed by inmates with DMQ that is provided to them at a minimum of three times per day.
12. With regard to PPE for correctional staff, all correctional staff have been issued masks and gloves. Additionally, N95 masks and face shields have been issued to correctional staff who have contact with inmates who have tested positive for COVID-19.
13. With regard to common areas within the jail, all common areas are disinfected by custodial staff daily.
14. With regard to inmate deaths related to COVID-19, no inmates who have tested positive for COVID-19 have died while at the jail. Additionally, no inmates have had symptoms severe enough to require hospitalization.
15. With regard to allegations that the main jail and/or the holding tanks are used to coerce behavior modification or as punishment, all correctional staff are trained not to threaten any inmate to achieve behavior modification. Additionally, transferring an inmate to the main jail from the Annex or East Annex does not occur for the purpose of punishing the inmate.

16. With regard to trusty job change, if a trusty refuses to do a specific job, that trusty could be given an extra detail or given discipline and removed from the program. Trusty's cannot refuse to work, however, an inmate can request to be removed from the trusty program all together.
17. With regard to COVID-19 information, a COVID-19 information sheet is posted throughout the jail. COVID-19 information was posted throughout the jail as early as March 11, 2020.
18. With regard to hand sanitizer, it is not used in the jail because as recently as October 2019, inmates attempted to mix the hand sanitizer with other substances in an effort to create drinkable alcohol which resulted in several inmates becoming ill.
19. With regard to shower cleanliness, showers in main jail are in cells and are cleaned by the inmates. Showers in the Annex are cleaned by the trusties and are to be cleaned after each use by the inmates. The receiving showers are cleaned by trusties immediately after each use.
20. With regard to the holding cells, inmates in the holding cells are not in the same vicinity as the positive and symptomatic inmates who are housed in separate pods.
21. With regard to pest control, the jail contracts with a third-party vendor for pest control whose services are utilized on an as needed basis.

22. With regard to inmate grievances, no inmate is charged for filing a medical grievance.

23. With regard to medical co-pays, no inmate is charged with a medical co-pay with regard to COVID-19 related symptoms including testing.

24. With regard to jail staff, signs for jail staff are posted throughout the facility requiring the jail staff to wash their hands with soap and water as frequently as possible. The signs also instruct the jail staff on the proper method and manner to wash their hands.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

Further, Affiant sayeth not.

Dated: April 19, 2020

/s/Captain Curtis Childs
CAPTAIN CURTIS CHILDS
*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above Affidavit. I am an attorney admitted to the Eastern District of Michigan. On April 19, 2020, I personally spoke with Captain Curtis Childs and read this Affidavit to him. Captain Childs told me that the information in the above Affidavit is true, and gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/Steven M. Potter (P33344)
Steven M. Potter (P33344)
Attorney for Defendants

EXHIBIT C

COUNTY OF OAKLAND
OFFICE OF THE SHERIFF

MICHAEL J. BOUCHARD



I want to take a few minutes and provide you with information on some of the steps we are taking here in the jail. These steps have been implemented to try and keep the coronavirus from entering the facility. So far, these steps have produced positive results and as of today, we do NOT have any known cases within the facility. The harsh reality is that may change but know that we are preparing for a worst-case scenario.

We are conducting extra cleaning throughout the facility. Utilizing sanitation sprays and additional Ultraviolet light equipment to supplement the cleaning.

We are asking for your assistance by making sure you are cleaning thoroughly within your housing areas. Cleaning supplies are readily available. Please use them as often as possible. Also, please practice good hygiene. **Wash your hands regularly and don't touch your face.**

We have put in place extra steps during our admission into jail. We are questioning and visibly monitoring any new arrest brought into the facility to try and determine if medical clearance is needed.

We have taken steps to make the jail even more sanitary by reducing people entering the facility, which you are aware of because of the current visitation situation. Professional visits are also being done using video visitation. Again, these steps have been put in place to protect you as well as us and those that may enter the facility.

The entire criminal justice system is involved in monitoring this situation.

Other changes may happen in the future based on circumstances as this situation is changing daily.

The Sheriff's Office is in daily communication with our health care provider as well as the Oakland County Health Department so that we keep current with the constantly changing situation

The Sheriff's Office and our partners want to assure you that we are taking this situation very seriously and taking as many precautions as we can. We will continue to monitor the situation going forward and will communicate again in the future when there is something you need to be aware.

Thank you and please make sure you are washing your hands!

Captain Curtis D. Childs

EXHIBIT D

CR No: 190209286



OAKLAND COUNTY SHERIFF OFFICE

1200 N TELEGRAPH ROAD
PONTIAC MI 48341
248-858-5000



Case Report

Administrative Details:

CR No 190209286	Subject C3370 - Inmate / Prisoner Incident
Report Date/Time 10/23/2019 19:55	Occurrence Date/Time 10/23/2019 19:55
Location 1201 N TELEGRAPH RD	Call Source FOP
Dispatched Offense C3370 Inmate / Prisoner Incident	Verified Offense C3370 Inmate / Prisoner Incident
County 63 - Oakland	City/Twp/Village 89 - Pontiac
Division Main Jail 3	

Action Requested:

- | | |
|--|--------------------------------------|
| <input type="checkbox"/> Arrest warrant | <input type="checkbox"/> Review only |
| <input type="checkbox"/> Search warrant | <input type="checkbox"/> Forfeiture |
| <input type="checkbox"/> Juvenile petition | <input type="checkbox"/> Other |

CR No: 190209286



Offenses:		
C3245 - Sick Care For Medical [OSLANDEROSJ (02580)]		
IBR Code / IBR Group /	Offense File Class	
Crime Against	Location Type 15 - Jail/Prison/Penitentiary/Corrections Fac	Offense Completed Not Applicable
Domestic Violence No	Hate/Bias 00 - None (No Bias)	
Using A-Alcohol: No C-Computer Equipment: No D-Drugs/Narcotics: No	Cargo Theft	

C3370 - Inmate / Prisoner Incident [OSLANDEROSJ (02580)]		
IBR Code / IBR Group /	Offense File Class	
Crime Against	Location Type 15 - Jail/Prison/Penitentiary/Corrections Fac	Offense Completed Not Applicable
Domestic Violence No	Hate/Bias 00 - None (No Bias)	
Using A-Alcohol: No C-Computer Equipment: No D-Drugs/Narcotics: No	Cargo Theft	

People:

[REDACTED] (S-SUSPECT) [OSPERRYW (00967)]									
Last Name [REDACTED]		First Name [REDACTED]		Middle Name [REDACTED]		Suffix		Mr/Mrs/Ms	
Aliases			Driver License#		DL State	DL Country USA	Personal ID#		
DOB (Age) [REDACTED]	Sex M	Race WHITE	Ethnicity Unknown	Birth City & State undefined	Birth Country undefined	Country of Citizenship			
Complexion	Build	Teeth	Height 5' 7"	Weight 160	Attire				
Street Address [REDACTED]			Apt #	County	Country USA	Home Phone [REDACTED]		Work Phone	
City [REDACTED]		State MI	Zip 48220	Cell Phone UNKNOWN	Email				
SSN [REDACTED]		MDOC/PRN#							
Passport#	Passport Country of Issue	School undefined		School City undefined		Grade undefined	Active Military Status		
Alerts				On Probation/Parole No		Habitual Offender Status			
Notes Inmate is one of several that drank hand sanitizer alcohol. PBT .099									

SUMMERS, RYAN (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]									
PE:	W.Type: CF	Last Name Summers		First Name Ryan		Middle Name		Suffix	Mr/Mrs/Ms DEPUTY
DOB (Age)	Sex M	Race WHITE	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			

CR No: 190209286



Street Address 1201 N Telegraph Road		Apt #	County OAKLAND	Country USA	Home Phone UNKNOWN	Work Phone
City Pontiac		State MI	Zip 48341	Cell Phone UNKNOWN	Email	
Phone/Email						
Type				Description		
BU-Business Phone #1				248-858-5000		
Notes Deputy assisting in cell shake down.						

MILES, JENNIFER (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]							
PE:	W.Type: CF	Last Name Miles		First Name Jennifer	Middle Name	Suffix	Mr/Mrs/Ms LT.
DOB (Age)	Sex F	Race WHITE	Ethnicity	Birth City & State	Birth Country	Country of Citizenship	
Street Address 1201 N Telegraph Road		Apt #	County OAKLAND	Country USA	Home Phone UNKNOWN	Work Phone	
City Pontiac		State MI	Zip 48341	Cell Phone UNKNOWN	Email		
Phone/Email							
Type				Description			
BU-Business Phone #1				248-858-5000			
Notes Main Jail Lieutenant notified.							

(O-OTHER) (B-BUSINESS, ETC.) [OSLANDEROSJ (02580)]							
PE:	W.Type:	Name ST. Joseph Mercy Oakland				Suffix	Mr/Mrs/Ms
DOB (Age)	Sex	Race UNKNOWN	Ethnicity	Birth City & State	Birth Country	Country of Citizenship	
Street Address 44405 Woodward Ave		Apt #	County	Country	Home Phone	Work Phone	
City Pontiac		State MI	Zip 48341	Cell Phone	Email		
Notes Hospital where inmate was transported to.							

(O-OTHER) (B-BUSINESS, ETC.) [OSLANDEROSJ (02580)]							
PE:	W.Type:	Name STAR EMS				Suffix	Mr/Mrs/Ms
DOB (Age)	Sex	Race UNKNOWN	Ethnicity	Birth City & State	Birth Country	Country of Citizenship	
Notes Transportation to hospital.							

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]							
PE:	W.Type: MS	Last Name [REDACTED]		First Name [REDACTED]	Middle Name [REDACTED]	Suffix	Mr/Mrs/Ms Inmate
Aliases #415800		Driver License# [REDACTED]		DL State MI	DL Country	Personal ID#	
DOB (Age)	Sex M	Race WHITE	Ethnicity	Birth City & State undefined	Birth Country undefined	Country of Citizenship	
Street Address [REDACTED]		Apt #	County	Country	Home Phone [REDACTED]	Work Phone	

CR No: 190209286



City PONTIAC		State MI	Zip 48341	Cell Phone UNKNOWN	Email
Passport#	Passport Country of Issue	School undefined	School City undefined	Grade undefined	Active Military Status
Alerts			On Probation/Parole No	Habitual Offender Status	
Notes Inmate Housed in E3. PBT:0.00					

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]

PE:	W.Type: MS	Last Name [REDACTED]	First Name [REDACTED]	Middle Name [REDACTED]	Suffix	Mr/Mrs/Ms Inmate
Aliases #379796		Driver License#	DL State	DL Country	Personal ID#	
DOB (Age) [REDACTED]	Sex M	Race WHITE	Ethnicity	Birth City & State undefined	Birth Country undefined	Country of Citizenship
Street Address 4 [REDACTED] AVE		Apt #	County	Country	Home Phone [REDACTED]	Work Phone
City [REDACTED] MI		State MI	Zip [REDACTED]	Cell Phone UNKNOWN	Email	
Passport#	Passport Country of Issue	School undefined	School City undefined	Grade undefined	Active Military Status	
Alerts			On Probation/Parole No	Habitual Offender Status		
Notes Inmate who notified Supervisor Perry. Inmate refused P.B.T.						

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]

PE:	W.Type: MS	Last Name [REDACTED]	First Name [REDACTED]	Middle Name [REDACTED]	Suffix	Mr/Mrs/Ms Inmate
Aliases #422717		Driver License#	DL State MI	DL Country	Personal ID#	
DOB (Age) [REDACTED]	Sex M	Race BLACK/AFRICAN AMERICAN	Ethnicity	Birth City & State undefined	Birth Country undefined	Country of Citizenship
Eye Color Brown	Hair Color Black	Hair Style	Hair Length	Facial Hair		
Complexion	Build Heavy	Teeth	Height 5' 4"	Weight 150	Attire	
Street Address [REDACTED] NORFOLK		Apt #	County	Country	Home Phone [REDACTED]	Work Phone
City [REDACTED] MI		State MI	Zip [REDACTED]	Cell Phone UNKNOWN	Email	
Passport#	Passport Country of Issue	School undefined	School City undefined	Grade undefined	Active Military Status	
Alerts			On Probation/Parole No	Habitual Offender Status		
Notes Inmate Housed in E3. PBT:0.00						

CR No: 190209286



[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	[REDACTED]	[REDACTED]					
Aliases			Driver License#	DL State	DL Country	Personal ID#			
#218169									
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
[REDACTED]	M	BLACK/AFRICAN AMERICAN		undefined	undefined				
Street Address		Apt #	County	Country	Home Phone	Work Phone			
[REDACTED]					[REDACTED]				
City		State	Zip	Cell Phone	Email				
[REDACTED]		MI	48030-1872	UNKNOWN					
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status				
		undefined	undefined	undefined	d				
Alerts				On Probation/Parole	Habitual Offender Status				
				No					
Notes									
Inmate Housed in E3.									
PBT:0.00									

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	[REDACTED]	[REDACTED]					
Aliases			Driver License#	DL State	DL Country	Personal ID#			
#424631				MI					
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
[REDACTED]	M	WHITE		undefined	undefined				
Street Address		Apt #	County	Country	Home Phone	Work Phone			
[REDACTED]					[REDACTED]				
City		State	Zip	Cell Phone	Email				
[REDACTED]		MI	[REDACTED]	[REDACTED]					
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status				
		undefined	undefined	undefined	d				
Alerts				On Probation/Parole	Habitual Offender Status				
				No					
Notes									
Inmate Housed in E3.									
PBT:0.00									

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	[REDACTED]	[REDACTED]					
Aliases			Driver License#	DL State	DL Country	Personal ID#			
#360716									
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
[REDACTED]	M	[REDACTED]		undefined	undefined				
Eye Color	Hair Color	Hair Style	Hair Length	Facial Hair					
Blue	Brown	Straight	Short						
Complexion	Build	Teeth	Height	Weight	Attire				
Fair	Medium		5' 11"	200					
Street Address		Apt #	County	Country	Home Phone	Work Phone			
[REDACTED]					[REDACTED]				
City		State	Zip	Cell Phone	Email				
[REDACTED]									

CR No: 190209286



[REDACTED]		MI	[REDACTED]	UNKNOWN		
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status	
		undefined	undefined	undefined		
Alerts			On Probation/Parole	Habitual Offender Status		
			No			
Notes						
Inmate Housed in E3.						
PBT: .091						

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]						
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate
	MS	[REDACTED]	[REDACTED]			
Aliases		Driver License#		DL State	DL Country	Personal ID#
#421754						
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship
[REDACTED]	M	[REDACTED]		[REDACTED]		
Street Address		Apt #	County	Country	Home Phone	Work Phone
[REDACTED]					[REDACTED]	
City		State	Zip	Cell Phone	Email	
[REDACTED]		MI	48101	UNKNOWN		
SSN	MDOC/PRN#					
[REDACTED]						
Alerts			On Probation/Parole	Habitual Offender Status		
			No			
Notes						
Inmate Housed in E3.						
PBT:0.00						

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]						
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate
	MS	[REDACTED]	[REDACTED]	[REDACTED]		
Aliases		Driver License#		DL State	DL Country	Personal ID#
#423888						
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship
01/13/1980 (39)	M	[REDACTED]		undefined	undefined	
Complexion	Build	Teeth	Height	Weight	Attire	
			[REDACTED]	[REDACTED]		
Street Address		Apt #	County	Country	Home Phone	Work Phone
[REDACTED]					[REDACTED]	[REDACTED]
City		State	Zip	Cell Phone	Email	
[REDACTED]		MI	[REDACTED]	UNKNOWN		
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status	
		undefined	undefined	undefined		
Employer		Employer Address		Employer Phone	Occupation	Employer CSZ
				[REDACTED]		
Alerts			On Probation/Parole	Habitual Offender Status		
			No			
Notes						
Inmate Housed in E3.						
PBT: .045.						

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]

CR No: 190209286



PE:	W.Type: MS	Last Name [REDACTED]	First Name [REDACTED]	Middle Name [REDACTED]	Suffix	Mr/Mrs/Ms Inmate
Aliases #412464			Driver License# [REDACTED]	DL State	DL Country	Personal ID#
DOB (Age) [REDACTED]	Sex M	Race UNKNOWN	Ethnicity	Birth City & State undefined	Birth Country undefined	Country of Citizenship
Eye Color Blue	Hair Color	Hair Style	Hair Length	Facial Hair		
Complexion	Build	Teeth	Height [REDACTED]	Weight [REDACTED]	Attire	
Street Address [REDACTED]			Apt #	County	Country	Home Phone [REDACTED]
City [REDACTED]			State MI	Zip [REDACTED]	Cell Phone UNKNOWN	Email
Passport#	Passport Country of Issue	School undefined	School City undefined	Grade undefined	Active Military Status	
Alerts				On Probation/Parole No	Habitual Offender Status	
Notes Inmate Housed in E3. PBT:0.00						

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]						
PE:	W.Type: MS	Last Name [REDACTED]	First Name [REDACTED]	Middle Name [REDACTED]	Suffix	Mr/Mrs/Ms Inmate
Aliases #398723			Driver License#	DL State	DL Country	Personal ID#
DOB (Age) [REDACTED]	Sex M	Race [REDACTED]	Ethnicity	Birth City & State undefined	Birth Country undefined	Country of Citizenship
Eye Color Brown	Hair Color	Hair Style	Hair Length	Facial Hair		
Complexion	Build	Teeth	Height	Weight 0	Attire	
Street Address [REDACTED]			Apt #	County	Country	Home Phone [REDACTED]
City [REDACTED]			State MI	Zip [REDACTED]	Cell Phone UNKNOWN	Email
Passport#	Passport Country of Issue	School undefined	School City undefined	Grade undefined	Active Military Status	
Alerts				On Probation/Parole No	Habitual Offender Status	
Notes Inmate Housed in E2. PBT:0.00						

[REDACTED] Z (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]						
PE:	W.Type: MS	Last Name [REDACTED]	First Name [REDACTED]	Middle Name	Suffix	Mr/Mrs/Ms Inmate
Aliases #394726			Driver License#	DL State	DL Country	Personal ID#
DOB (Age) [REDACTED]	Sex M	Race UNKNOWN	Ethnicity	Birth City & State	Birth Country	Country of Citizenship

CR No: 190209286



Complexion	Build	Teeth	Height 5' 10"	Weight 235	Attire	
Street Address		Apt #	County	Country USA	Home Phone	Work Phone
City		State MI	Zip 48021	Cell Phone UNKNOWN	Email	
Notes Inmate Housed in E2. PBT:0.00						

(O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]						
PE:	W.Type: MS	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate
Aliases #036944		Driver License#		DL State MI	DL Country	Personal ID#
DOB (Age)	Sex M	Race	Ethnicity	Birth City & State undefined	Birth Country undefined	Country of Citizenship
Eye Color Brown	Hair Color Bald	Hair Style		Hair Length	Facial Hair Clean Shaven	
Complexion	Build	Teeth	Height 5' 8"	Weight 165	Attire	
Street Address		Apt #	County	Country	Home Phone	Work Phone
City		State MI	Zip 48342	Cell Phone UNKNOWN	Email	
Passport#	Passport Country of Issue	School undefined	School City undefined	Grade undefined	Active Military Status d	
Alerts				On Probation/Parole No	Habitual Offender Status	
Notes Inmate Housed in E2. PBT:0.00						

(O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]						
PE:	W.Type: MS	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate
Aliases #429412		Driver License#		DL State MI	DL Country	Personal ID#
DOB (Age)	Sex M	Race	Ethnicity	Birth City & State DETROIT Michigan	Birth Country USA	Country of Citizenship
Eye Color Brown	Hair Color Black	Hair Style Afro		Hair Length Short	Facial Hair Clean Shaven	
Complexion	Build Heavy	Teeth	Height 5' 7"	Weight 180	Attire	
Street Address		Apt #	County	Country	Home Phone UNKNOWN	Work Phone
City		State MI	Zip	Cell Phone	Email	
SSN	MDOC/PRN#					
Alerts				On Probation/Parole	Habitual Offender Status	

CR No: 190209286



Notes		No
Inmate Housed in E2. PBT:0.00		

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	[REDACTED]	[REDACTED]					
Aliases		Driver License#		DL State	DL Country	Personal ID#			
#306880		[REDACTED]		MI					
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
[REDACTED]	M	[REDACTED]		undefined	undefined				
Eye Color	Hair Color	Hair Style	Hair Length	Facial Hair					
Brown									
Complexion	Build	Teeth	Height	Weight	Attire				
			6' 0"	160					
Street Address		Apt #	County	Country	Home Phone	Work Phone			
[REDACTED]					[REDACTED]				
City	State	Zip	Cell Phone	Email					
[REDACTED]	MI	[REDACTED]	UNKNOWN						
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status				
		undefined	undefined	undefined					
Alerts			On Probation/Parole	Habitual Offender Status					
			No						
Notes									
Inmate Housed in E2. PBT:0.00									

[REDACTED] (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms DEPUTY			
	CF	Kajy	Avis						
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
	M	WHITE							
Street Address		Apt #	County	Country	Home Phone	Work Phone			
1201 N Telegraph Road			OAKLAND	USA	UNKNOWN				
City	State	Zip	Cell Phone	Email					
Pontiac	MI	48341	UNKNOWN						
Phone/Email									
Type					Description				
BU-Business Phone #1					248-858-5000				
Notes									
Deputy assisting in cell shake down.									

ALEE, JILLIAN (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms DEPUTY			
	CF	Alee	Jillian						
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
	F	WHITE							
Street Address		Apt #	County	Country	Home Phone	Work Phone			
1201 N Telegraph Road			OAKLAND	USA	UNKNOWN				
City	State	Zip	Cell Phone	Email					

CR No: 190209286



Pontiac	MI	48341	UNKNOWN	
Phone/Email				
Type		Description		
BU-Business Phone #1		248-858-5000		
Notes Deputy assisting in cell shake down.				

MARRA, SALVATORE (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name		First Name		Middle Name		Suffix	Mr/Mrs/Ms Supervisor
	CF	Marra		Salvatore					
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
	M	WHITE		OAKLAND	USA				
Street Address			Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Road				OAKLAND	USA	UNKNOWN			
City		State	Zip	Cell Phone	Email				
Pontiac		MI	48341	UNKNOWN					
Phone/Email									
Type					Description				
BU-Business Phone #1					248-858-5000				
Notes Classification Supervisor.									

WHITING, ADAM (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name		First Name		Middle Name		Suffix	Mr/Mrs/Ms Sergeant
	CF	Whiting		Adam					
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
	M	WHITE		OAKLAND	USA				
Street Address			Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Road				OAKLAND	USA	UNKNOWN			
City		State	Zip	Cell Phone	Email				
Pontiac		MI	48341	UNKNOWN					
Phone/Email									
Type					Description				
BU-Business Phone #1					248-858-5000				
Notes Main Jail Sergeant.									

JORDAN, ZACHARY (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name		First Name		Middle Name		Suffix	Mr/Mrs/Ms Sergeant
	CF	Jordan		Zachary					
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
	M	WHITE		OAKLAND	USA				
Street Address			Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Road				OAKLAND	USA	UNKNOWN			
City		State	Zip	Cell Phone	Email				
Pontiac		MI	48341	UNKNOWN					
Phone/Email									
Type					Description				
BU-Business Phone #1					248-858-5000				
Notes Main Jail Sergeant.									

CR No: 190209286



LANDEROS, JORGE (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]										
PE:	W.Type:	Last Name			First Name			Middle Name	Suffix	Mr/Mrs/Ms
	CF	Landeros			Jorge					DEPUTY
DOB (Age)		Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
		M	WHITE							
Street Address				Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Road					OAKLAND	USA	UNKNOWN			
City			State	Zip	Cell Phone	Email				
Pontiac			MI	48341	UNKNOWN					
Phone/Email										
Type					Description					
BU-Business Phone #1					248-858-5000					
Notes										
Deputy assigned in Trusty Dorm.										

HICKS, BRIANA (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]										
PE:	W.Type:	Last Name			First Name			Middle Name	Suffix	Mr/Mrs/Ms
	CF	Hicks			Briana					DEPUTY
DOB (Age)		Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
		F	WHITE							
Street Address				Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Road					OAKLAND	USA	UNKNOWN			
City			State	Zip	Cell Phone	Email				
Pontiac			MI	48341	UNKNOWN					
Phone/Email										
Type					Description					
BU-Business Phone #1					248-858-5000					
Notes										
Deputy assisting in cell shake down.										

PERRY, WILLIAM (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]										
PE:	W.Type:	Last Name			First Name			Middle Name	Suffix	Mr/Mrs/Ms
	CF	Perry			William					Supervisor
DOB (Age)		Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
		M	WHITE							
Street Address				Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Road					OAKLAND	USA	UNKNOWN			
City			State	Zip	Cell Phone	Email				
Pontiac			MI	48341	UNKNOWN					
Phone/Email										
Type					Description					
BU-Business Phone #1					248-858-5000					
Notes										
Laundry/Trusty Dorm Supervisor.										

GANEY, MARK (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]										
PE:	W.Type:	Last Name			First Name			Middle Name	Suffix	Mr/Mrs/Ms
	CF	Ganey			Mark					DEPUTY
DOB (Age)		Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
		M	WHITE							
Street Address				Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Road					OAKLAND	USA	UNKNOWN			
City			State	Zip	Cell Phone	Email				

CR No: 190209286



Pontiac	MI	48341	UNKNOWN	
Phone/Email				
Type		Description		
BU-Business Phone #1		248-858-5000		
Notes Deputy assisting in cell shake down.				

PELT, DALE (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]										
PE:	W.Type:	Last Name			First Name			Middle Name	Suffix	Mr/Mrs/Ms
	CF	Pelt			Dale					DEPUTY
DOB (Age)		Sex	Race	Ethnicity	Birth City & State		Birth Country	Country of Citizenship		
		M	WHITE							
Street Address				Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Road					OAKLAND	USA	UNKNOWN			
City			State	Zip	Cell Phone		Email			
Pontiac			MI	48341	UNKNOWN					
Phone/Email										
Type					Description					
BU-Business Phone #1					248-858-5000					
Notes Deputy assisting in cell shake down.										

BURKE JR, BRIAN (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]										
PE:	W.Type:	Last Name			First Name			Middle Name	Suffix	Mr/Mrs/Ms
	CF	Burke Jr			Brian					DEPUTY
DOB (Age)		Sex	Race	Ethnicity	Birth City & State		Birth Country	Country of Citizenship		
		M	WHITE							
Street Address				Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Road					OAKLAND	USA	UNKNOWN			
City			State	Zip	Cell Phone		Email			
Pontiac			MI	48341	UNKNOWN					
Phone/Email										
Type					Description					
BU-Business Phone #1					248-858-5000					
Notes Deputy assisting in cell shake down.										

ALLEN, ERIN (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]										
PE:	W.Type:	Last Name			First Name			Middle Name	Suffix	Mr/Mrs/Ms
	CF	Allen			Erin					DEPUTY
DOB (Age)		Sex	Race	Ethnicity	Birth City & State		Birth Country	Country of Citizenship		
		M	WHITE							
Street Address				Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Road					OAKLAND	USA				
City			State	Zip	Cell Phone		Email			
Pontiac			MI	48341						
Phone/Email										
Type					Description					
BU-Business Phone #1					248-858-5000					
Notes Deputy working Laundry Dorm.										

CR No: 190209286



OGANS, ROSS (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]										
PE:	W.Type:	Last Name			First Name			Middle Name	Suffix	Mr/Mrs/Ms
	CF	Ogans			Ross					DEPUTY
DOB (Age)		Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
		M	WHITE							
Street Address				Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Road					OAKLAND	USA	UNKNOWN			
City			State	Zip	Cell Phone	Email				
Pontiac			MI	48341	UNKNOWN					
Phone/Email										
Type					Description					
BU-Business Phone #1					248-858-5000					
Notes										
Deputy assisting in cell shake down.										

OTTO, BRYAN (O-OTHER) (L-LAW ENFORCEMENT OFFICER) [OSLANDEROSJ (02580)]										
PE:	W.Type:	Last Name			First Name			Middle Name	Suffix	Mr/Mrs/Ms
	CF	Otto			Bryan					DEPUTY
DOB (Age)		Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
		M	WHITE							
Street Address				Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Road					OAKLAND	USA	UNKNOWN			
City			State	Zip	Cell Phone	Email				
Pontiac			MI	48341	UNKNOWN					
Phone/Email										
Type					Description					
BU-Business Phone #1					248-858-5000					
Notes										
Deputy assisting in cell shake down.										

WINCHEL, TYLER (O-OTHER) (MP-MEDICAL PERSONNEL) [OSLANDEROSJ (02580)]										
PE:	W.Type:	Last Name			First Name			Middle Name	Suffix	Mr/Mrs/Ms
	MD	Winchel			Tyler					EMT
DOB (Age)		Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
		M	WHITE							
Street Address				Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Rd							UNKNOWN			
City			State	Zip	Cell Phone	Email				
Pontiac			MI	48341	UNKNOWN					
Notes										
Main Jail Clinic Staff.										

WILLIAMS, ADRIAN (O-OTHER) (MP-MEDICAL PERSONNEL) [OSLANDEROSJ (02580)]										
PE:	W.Type:	Last Name			First Name			Middle Name	Suffix	Mr/Mrs/Ms
	MD	Williams			Adrian					RN
DOB (Age)		Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
		U	UNKNOWN							
Street Address				Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Rd							UNKNOWN			
City			State	Zip	Cell Phone	Email				
Pontiac			MI	48341	UNKNOWN					
Notes										
Main Jail Clinic Staff.										

CR No: 190209286



KACHADURIAN, KAREN (O-OTHER) (MP-MEDICAL PERSONNEL) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name		First Name		Middle Name		Suffix	Mr/Mrs/Ms RN
	MD	Kachadurian		Karen					
DOB (Age)		Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship		
		F	WHITE						
Street Address			Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Rd						UNKNOWN			
City		State	Zip	Cell Phone	Email				
Pontiac		MI	48341	UNKNOWN					
Notes									
Main Jail Clinic Staff.									

VEATCH, DANIELLE (O-OTHER) (MP-MEDICAL PERSONNEL) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name		First Name		Middle Name		Suffix	Mr/Mrs/Ms LPN
	MD	Veatch		Danielle					
DOB (Age)		Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship		
		F	WHITE						
Street Address			Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Rd						UNKNOWN			
City		State	Zip	Cell Phone	Email				
Pontiac		MI	48341	UNKNOWN					
Notes									
Main Jail Clinic Staff.									

WARREN, VICKI (O-OTHER) (MP-MEDICAL PERSONNEL) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name		First Name		Middle Name		Suffix	Mr/Mrs/Ms RN
	MD	Warren		Vicki					
DOB (Age)		Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship		
		F	UNKNOWN						
Street Address			Apt #	County	Country	Home Phone	Work Phone		
1201 N Telegraph Rd						UNKNOWN			
City		State	Zip	Cell Phone	Email				
Pontiac		MI	48341	UNKNOWN					
Notes									
Main Jail Clinic Staff.									

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name		First Name		Middle Name		Suffix	Mr/Mrs/Ms Inmate
	MS	[REDACTED]		[REDACTED]		[REDACTED]			
Aliases			Driver License#	DL State	DL Country	Personal ID#			
#307700			[REDACTED]	MI					
DOB (Age)		Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship		
[REDACTED]		M	WHITE	undefined	undefined	undefined			
Eye Color		Hair Color		Hair Style		Hair Length		Facial Hair	
Green		Brown		Straight		Short		Clean Shaven	
Complexion		Build	Teeth	Height	Weight	Attire			
		Medium		6' 3"	180				
Street Address			Apt #	County	Country	Home Phone	Work Phone		
[REDACTED]					USA	[REDACTED]			
City		State	Zip	Cell Phone	Email				
[REDACTED]		MI	48328	UNKNOWN					
SSN		MDOC/PRN#							
[REDACTED]									
Passport#	Passport Country of Issue	School		School City		Grade	Active Military Status		
		undefined		undefined		undefined			
Alerts					On Probation/Parole	Habitual Offender Status			

CR No: 190209286



		No
Notes		
Inmate Housed in W3.		
PBT:0.00		

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	MARVIN	[REDACTED]					
Aliases		Driver License#		DL State	DL Country	Personal ID#			
#409824		[REDACTED]		MI					
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
[REDACTED]	M	UNKNOWN		undefined	undefined				
Street Address		Apt #	County	Country	Home Phone	Work Phone			
[REDACTED]			Wayne	USA	[REDACTED]				
City		State	Zip	Cell Phone	Email				
[REDACTED]		MI	[REDACTED]	UNKNOWN					
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status				
		undefined	undefined	undefine	d				
Alerts				On Probation/Parole	Habitual Offender Status				
				No					
Notes									
Inmate Housed in W3.									
PBT:0.00									

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	[REDACTED]	[REDACTED]					
Aliases		Driver License#		DL State	DL Country	Personal ID#			
#422676		[REDACTED]		MI					
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
[REDACTED] (24)	M	[REDACTED]		undefined	undefined				
Complexion	Build	Teeth	Height	Weight	Attire				
			6' 2"	195					
Street Address		Apt #	County	Country	Home Phone	Work Phone			
[REDACTED]				USA	[REDACTED]				
City		State	Zip	Cell Phone	Email				
[REDACTED]		MI	[REDACTED]	UNKNOWN					
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status				
		undefined	undefined	undefine	d				
Alerts				On Probation/Parole	Habitual Offender Status				
				No					
Notes									
Inmate Housed in W3.									
PBT:0.00									

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	GREGORY	ALLEN					
Aliases		Driver License#		DL State	DL Country	Personal ID#			
#215651		[REDACTED]		MI					
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			

CR No: 190209286



[REDACTED] (19)		M	WHITE	undefined	undefined	
Eye Color	Hair Color		Hair Style		Hair Length	
Blue	Brown				Facial Hair	
Complexion	Build	Teeth	Height	Weight	Attire	
			5' 11"	185		
Street Address		Apt #	County	Country	Home Phone	Work Phone
[REDACTED]			Oakland	USA	[REDACTED]	
City		State	Zip	Cell Phone	Email	
[REDACTED]		MI	[REDACTED]	UNKNOWN		
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status	
		undefined	undefined	undefine	d	
Alerts				On Probation/Parole	Habitual Offender Status	
				No		
Notes						
Inmate Housed in W3.						
PBT:0.00						

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]						
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate
	MS	[REDACTED]	[REDACTED]	[REDACTED]		
Aliases		Driver License#		DL State	DL Country	Personal ID#
#371646		[REDACTED]		MI		
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship
[REDACTED]	M	WHITE		undefined	undefined	
Eye Color	Hair Color		Hair Style		Hair Length	
Brown	Brown		Straight		Short	
Complexion	Build	Teeth	Height	Weight	Attire	
	Medium		5' 11"	155	Clean Shaven	
Street Address		Apt #	County	Country	Home Phone	Work Phone
[REDACTED]					[REDACTED]	000000000
City		State	Zip	Cell Phone	Email	
[REDACTED]		MI	48430	UNKNOWN		
SSN	MDOC/PRN#					
[REDACTED]						
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status	
		undefined	undefined	undefine	d	
Employer	Employer Address		Employer Phone	Occupation	Employer CSZ	
			000000000			
Alerts				On Probation/Parole	Habitual Offender Status	
				No		
Notes						
Inmate Housed in W3.						
PBT:0.00						

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]						
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate
	MS	[REDACTED]	[REDACTED]	[REDACTED]		
Aliases		Driver License#		DL State	DL Country	Personal ID#
#424876		[REDACTED]				
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship
[REDACTED] (22)	M	[REDACTED]		undefined	undefined	

CR No: 190209286



Eye Color Brown		Hair Color Black		Hair Style		Hair Length		Facial Hair	
Complexion		Build		Teeth		Height 5' 10"		Weight 235	
Street Address [REDACTED]		Apt #		County Oakland		Country USA		Home Phone	
City Southfield		State MI		Zip [REDACTED]		Cell Phone UNKNOWN		Email	
Passport#		Passport Country of Issue		School undefined		School City undefined		Grade undefined	
Alerts		On Probation/Parole No		Habitual Offender Status					
Notes Inmate Housed in W3. PBT:0.00									

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]										
PE:	W.Type: MS	Last Name [REDACTED]			First Name [REDACTED]			Middle Name [REDACTED]		Suffix
Aliases #430555										
DOB (Age) [REDACTED] (30)		Sex M	Race [REDACTED]		Ethnicity AMERICAN	Birth City & State undefined		Birth Country undefined		Country of Citizenship
Complexion		Build		Teeth		Height 6' 0"		Weight 205		
Street Address [REDACTED]		Apt #		County Wayne		Country USA		Home Phone [REDACTED]		
City [REDACTED]		State MI		Zip 48141		Cell Phone UNKNOWN		Email		
Passport#		Passport Country of Issue		School undefined		School City undefined		Grade undefined		
Alerts		On Probation/Parole No		Habitual Offender Status						
Notes Inmate Housed in W3. PBT:0.00										

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]										
PE:	W.Type: MS	Last Name [REDACTED]			First Name [REDACTED]			Middle Name NORMAN		Suffix
Aliases #149116										
DOB (Age) [REDACTED]		Sex M	Race [REDACTED]		Ethnicity	Birth City & State undefined		Birth Country undefined		Country of Citizenship
Eye Color Brown		Hair Color Brown		Hair Style		Hair Length		Facial Hair		
Complexion		Build		Teeth		Height 5' 5"		Weight 165		
Street Address [REDACTED]		Apt #		County		Country		Home Phone [REDACTED]		
City		State		Zip		Cell Phone		Email		

CR No: 190209286



Passport#		Passport Country of Issue		School		School City		Grade		Active Military Status	
				MI		UNKNOWN		undefined		undefined	
Alerts						On Probation/Parole			Habitual Offender Status		
						No					
Notes											
Inmate Housed in W2.											
PBT:0.00											

[REDACTED] (O-OTHER) (IN-INMATE) [OSPERRYW (00967)]												
PE:	W.Type:	Last Name			First Name			Middle Name			Suffix	Mr/Mrs/Ms Inmate
	MS	[REDACTED]			[REDACTED]							
Aliases				Driver License#				DL State	DL Country	Personal ID#		
									USA			
DOB (Age)		Sex	Race	Ethnicity		Birth City & State		Birth Country		Country of Citizenship		
[REDACTED] (30)		M	[REDACTED]	Unknown								
Complexion		Build		Teeth		Height		Weight	Attire			
						5' 11"		200				
Street Address				Apt #	County		Country		Home Phone		Work Phone	
[REDACTED]					[REDACTED]		USA		[REDACTED]			
City			State	Zip	Cell Phone		Email					
[REDACTED]			MI	[REDACTED]								
SSN		MDOC/PRN#										
[REDACTED]												
Notes												
Inmate housed in E-2 tested for B.A.C. .000												

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]												
PE:	W.Type:	Last Name			First Name			Middle Name			Suffix	Mr/Mrs/Ms Inmate
	MS	[REDACTED]			JEREMY			[REDACTED]				
Aliases				Driver License#				DL State	DL Country	Personal ID#		
#169767				[REDACTED]				MI				
DOB (Age)		Sex	Race	Ethnicity		Birth City & State		Birth Country		Country of Citizenship		
[REDACTED]		M	[REDACTED]	undefined		undefined		undefined				
Eye Color		Hair Color		Hair Style		Hair Length		Facial Hair				
Brown		Brown										
Complexion		Build		Teeth		Height		Weight	Attire			
						5' 10"		190				
Street Address				Apt #	County		Country		Home Phone		Work Phone	
[REDACTED]					Oakland		USA		[REDACTED]			
City			State	Zip	Cell Phone		Email					
[REDACTED]			MI	48329	UNKNOWN							
SSN		MDOC/PRN#										
[REDACTED]												
Passport#		Passport Country of Issue		School		School City		Grade		Active Military Status		
				undefined		undefined		undefined		undefined		
Alerts						On Probation/Parole			Habitual Offender Status			
						No						
Notes												
Inmate Housed in W2.												
PBT:0.00												

CR No: 190209286



[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	[REDACTED]	[REDACTED]					
Aliases			Driver License#	DL State	DL Country	Personal ID#			
#410646			[REDACTED]	MI					
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
[REDACTED]	M	[REDACTED]		undefined	undefined				
Complexion	Build	Teeth	Height	Weight	Attire				
			5' 7"	257					
Street Address		Apt #	County	Country	Home Phone	Work Phone			
[REDACTED]					[REDACTED]				
City	State	Zip	Cell Phone	Email					
[REDACTED]	MI	48165	UNKNOWN						
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status				
		undefined	undefined	undefined					
Alerts				On Probation/Parole	Habitual Offender Status				
				No					
Notes									
Inmate Housed in W2.									
PBT:0.00									

[REDACTED] (O-OTHER) (IN-INMATE) [OSPERRYW (00967)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	[REDACTED]	[REDACTED]					
Aliases			Driver License#	DL State	DL Country	Personal ID#			
					USA				
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
[REDACTED]	M	[REDACTED]		undefined	undefined				
Eye Color	Hair Color	Hair Style	Hair Length	Facial Hair					
Brown	Black								
Complexion	Build	Teeth	Height	Weight	Attire				
			5' 7"	165					
Street Address		Apt #	County	Country	Home Phone	Work Phone			
[REDACTED]					[REDACTED]				
City	State	Zip	Cell Phone	Email					
[REDACTED]	MI	48234							
SSN	MDOC/PRN#								
[REDACTED]									
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status				
		undefined	undefined	undefined					
Alerts				On Probation/Parole	Habitual Offender Status				
				No					
Notes									
Inmate housed in E-1 tested for B.A.C. .000									

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	[REDACTED]	[REDACTED]					
Aliases			Driver License#	DL State	DL Country	Personal ID#			

CR No: 190209286



#230121		[REDACTED]		MI			
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship	
[REDACTED]	M	[REDACTED]	[REDACTED]	undefined	undefined		
Eye Color		Hair Color		Hair Style		Facial Hair	
Brown		Brown					
Complexion	Build	Teeth	Height	Weight	Attire		
Dark	Thin		6' 0"	180			
Street Address			Apt #	County	Country	Home Phone	Work Phone
[REDACTED]						[REDACTED]	
City		State	Zip	Cell Phone	Email		
[REDACTED]		MI	[REDACTED]	UNKNOWN			
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status		
		undefined	undefined	undefined			
Alerts				On Probation/Parole	Habitual Offender Status		
				No			
Notes							
Inmate Housed in W2.							
PBT:0.00							

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]							
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate	
	MS	[REDACTED]	[REDACTED]	[REDACTED]			
Aliases			Driver License#	DL State	DL Country	Personal ID#	
#427062			[REDACTED]	MI			
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship	
[REDACTED]	M	[REDACTED]	[REDACTED]	undefined	undefined		
Eye Color		Hair Color		Hair Style		Facial Hair	
Brown		Black		Straight			
Complexion	Build	Teeth	Height	Weight	Attire		
	Heavy		5' 9"	210			
Street Address			Apt #	County	Country	Home Phone	Work Phone
[REDACTED]						[REDACTED]	
City		State	Zip	Cell Phone	Email		
[REDACTED]		MI	48127	UNKNOWN			
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status		
		undefined	undefined	undefined			
Alerts				On Probation/Parole	Habitual Offender Status		
				No			
Notes							
Inmate Housed in W2							
PBT:0.00							

[REDACTED] (O-OTHER) (IN-INMATE) [OSPERRYW (00967)]							
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate	
	MS	[REDACTED]	[REDACTED]	[REDACTED]			
Aliases			Driver License#	DL State	DL Country	Personal ID#	
					USA		
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship	
[REDACTED]	M	[REDACTED]	[REDACTED]	undefined	undefined		

CR No: 190209286



Eye Color Brown		Hair Color Black		Hair Style		Hair Length		Facial Hair	
Complexion		Build		Teeth		Height 5' 11"		Weight 160	
Street Address [REDACTED]		Apt #		County Wayne		Country USA		Home Phone [REDACTED]	
City [REDACTED]		State MI		Zip 48224		Cell Phone		Email	
SSN [REDACTED]		MDOC/PRN#							
Passport#		Passport Country of Issue		School undefined		School City undefined		Grade undefined	
								Active Military Status	
Alerts				On Probation/Parole No		Habitual Offender Status			
Notes Inmate housed in E-1 tested for B.A.C. .000									

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]										
PE:	W.Type: MS	Last Name [REDACTED]			First Name [REDACTED]			Middle Name [REDACTED]		Suffix
	Mr/Mrs/Ms Inmate									
Aliases #430110				Driver License# [REDACTED]			DL State MI	DL Country	Personal ID#	
DOB (Age) [REDACTED]		Sex M	Race WHITE		Ethnicity	Birth City & State undefined	Birth Country undefined	Country of Citizenship		
Eye Color Brown		Hair Color Brown		Hair Style		Hair Length		Facial Hair		
Complexion Medium		Build Thin		Teeth		Height 5' 10"		Weight 135		Attire
Street Address [REDACTED]		Apt #		County		Country		Home Phone [REDACTED]		Work Phone [REDACTED]
City [REDACTED]		State MI		Zip 48071		Cell Phone UNKNOWN		Email		
SSN [REDACTED]		MDOC/PRN#								
Passport#		Passport Country of Issue		School undefined		School City undefined		Grade undefined		Active Military Status
Employer			Employer Address			Employer Phone 313585628	Occupation		Employer CSZ	
						7				
Alerts				On Probation/Parole No		Habitual Offender Status				
Notes Inmate Housed in W2 PBT:0.00										

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]										
PE:	W.Type: MS	Last Name [REDACTED]			First Name [REDACTED]			Middle Name [REDACTED]		Suffix
	Mr/Mrs/Ms Inmate									
Aliases #429150				Driver License# [REDACTED]			DL State MI	DL Country	Personal ID#	
DOB (Age) [REDACTED]		Sex M	Race BLACK/AFR		Ethnicity	Birth City & State undefined	Birth Country undefined	Country of Citizenship		

CR No: 190209286



Complexion	Build	Teeth	Height 6' 4"	Weight 185	Attire
Street Address ████████████████████		Apt #	County	Country	Home Phone ██████████
City ██████████		State MI	Zip ██████████	Cell Phone UNKNOWN	Email
Passport#	Passport Country of Issue	School undefined	School City undefined	Grade undefined	Active Military Status
Alerts			On Probation/Parole No	Habitual Offender Status	
Notes Inmate Housed in W2 PBT:0.00					

██████████ (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]

PE:	W.Type: MS	Last Name ██████████	First Name ██████████	Middle Name ██████████	Suffix	Mr/Mrs/Ms Inmate
Aliases		Driver License# ██████████	DL State MI	DL Country	Personal ID#	
DOB (Age) ██████████	Sex M	Race WHITE	Ethnicity	Birth City & State undefined	Birth Country undefined	Country of Citizenship
Eye Color Hazel	Hair Color Brown	Hair Style	Hair Length	Facial Hair		
Complexion Medium	Build Medium	Teeth	Height 5' 10"	Weight 145	Attire	
Street Address ████████████████████		Apt #	County	Country	Home Phone ██████████	Work Phone
City ██████████		State MI	Zip ██████████	Cell Phone UNKNOWN	Email	
Passport#	Passport Country of Issue	School undefined	School City undefined	Grade undefined	Active Military Status	
Alerts			On Probation/Parole No	Habitual Offender Status		
Notes Inmate Housed in W2 PBT:0.00						

██████████ (O-OTHER) (IN-INMATE) [OSPERRYW (00967)]

PE:	W.Type: MS	Last Name ██████████	First Name ██████████	Middle Name ██████████	Suffix	Mr/Mrs/Ms Inmate
Aliases		Driver License#	DL State	DL Country USA	Personal ID#	
DOB (Age) ██████████	Sex M	Race ██████████	Ethnicity Unknown	Birth City & State	Birth Country	Country of Citizenship
Complexion	Build	Teeth	Height 6' 2"	Weight 180	Attire	
Street Address ████████████████████		Apt #	County	Country USA	Home Phone ██████████	Work Phone
City ██████████		State MI	Zip 48203	Cell Phone UNKNOWN	Email	
SSN ██████████	MDOC/PRN#					

CR No: 190209286



Notes
Inmate housed in E-1 tested for bac. .000

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]											
PE:	W.Type:	Last Name			First Name			Middle Name		Suffix	Mr/Mrs/Ms Inmate
	MS	[REDACTED]			[REDACTED]			[REDACTED]			
Aliases				Driver License#				DL State	DL Country	Personal ID#	
#353331				[REDACTED]				MI			
DOB (Age)	Sex	Race	Ethnicity		Birth City & State	Birth Country		Country of Citizenship			
[REDACTED]	M	[REDACTED]	[REDACTED]		undefined	undefined					
Eye Color		Hair Color		Hair Style		Hair Length		Facial Hair			
Brown		Black		Straight		Short		Clean Shaven			
Complexion	Build	Teeth		Height	Weight	Attire					
	Thin			5' 11"	160						
Street Address				Apt #	County	Country	Home Phone		Work Phone		
[REDACTED]							[REDACTED]				
City			State	Zip	Cell Phone		Email				
[REDACTED]			MI	48390	UNKNOWN						
Passport#	Passport Country of Issue		School		School City		Grade	Active Military Status			
			undefined		undefined		undefined				
Alerts						On Probation/Parole		Habitual Offender Status			
						No					
Notes											
Inmate Housed in W1											
PBT:0.00											

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]											
PE:	W.Type:	Last Name			First Name			Middle Name		Suffix	Mr/Mrs/Ms Inmate
	MS	[REDACTED]			[REDACTED]			[REDACTED]			
Aliases				Driver License#				DL State	DL Country	Personal ID#	
#137789				[REDACTED]							
DOB (Age)	Sex	Race	Ethnicity		Birth City & State	Birth Country		Country of Citizenship			
[REDACTED]	M	UNKNOWN	[REDACTED]		undefined	undefined					
Street Address				Apt #	County	Country	Home Phone		Work Phone		
[REDACTED]						USA	[REDACTED]				
City			State	Zip	Cell Phone		Email				
[REDACTED]			MI	49680	UNKNOWN						
Passport#	Passport Country of Issue		School		School City		Grade	Active Military Status			
			undefined		undefined		undefined				
Alerts						On Probation/Parole		Habitual Offender Status			
						No					
Notes											
Inmate Housed in W1											
PBT:0.00											

[REDACTED] (O-OTHER) (IN-INMATE) [OSPERRYW (00967)]											
PE:	W.Type:	Last Name			First Name			Middle Name		Suffix	Mr/Mrs/Ms Inmate
		[REDACTED]			[REDACTED]			[REDACTED]			
Aliases				Driver License#				DL State	DL Country	Personal ID#	
								USA			
DOB (Age)	Sex	Race	Ethnicity		Birth City & State	Birth Country		Country of Citizenship			
[REDACTED]	M	[REDACTED]	[REDACTED]		undefined	undefined					
Notes											

CR No: 190209286



Street Address [REDACTED]		Apt #	County Wayne	Country USA	Home Phone [REDACTED]	Work Phone
City [REDACTED]		State MI	Zip [REDACTED]	Cell Phone UNKNOWN	Email	
Passport#	Passport Country of Issue	School undefined	School City undefined	Grade undefined	Active Military Status	
Alerts				On Probation/Parole No	Habitual Offender Status	
Notes Inmate housed in E-1 tested for BAC. .000						

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]

PE:	W.Type: MS	Last Name [REDACTED]	First Name [REDACTED]	Middle Name [REDACTED]	Suffix	Mr/Mrs/Ms Inmate
Aliases #361346		Driver License#		DL State	DL Country	Personal ID#
DOB (Age) [REDACTED]	Sex M	Race UNKNOWN	Ethnicity	Birth City & State undefined	Birth Country undefined	Country of Citizenship
Complexion	Build	Teeth	Height 6' 0"	Weight 200	Attire	
Street Address [REDACTED]		Apt #	County	Country	Home Phone [REDACTED]	Work Phone
City [REDACTED]		State MICHIGAN	Zip [REDACTED]	Cell Phone UNKNOWN	Email	
Passport#	Passport Country of Issue	School undefined	School City undefined	Grade undefined	Active Military Status	
Alerts				On Probation/Parole No	Habitual Offender Status	
Notes Inmate Housed in W1 PBT: .059						

[REDACTED] (O-OTHER) (IN-INMATE) [OSPERRYW (00967)]

PE:	W.Type:	Last Name [REDACTED]	First Name [REDACTED]	Middle Name [REDACTED]	Suffix	Mr/Mrs/Ms
Aliases		Driver License#		DL State MI	DL Country USA	Personal ID#
DOB (Age) [REDACTED]	Sex M	Race [REDACTED]	Ethnicity	Birth City & State undefined	Birth Country undefined	Country of Citizenship
Eye Color Brown	Hair Color Black	Hair Style Straight	Hair Length Short	Facial Hair Goatee and Mustache		
Complexion Medium	Build Medium	Teeth	Height 6' 1"	Weight 195	Attire	
Street Address [REDACTED]		Apt #	County	Country	Home Phone	Work Phone
City [REDACTED]		State MI	Zip 48329	Cell Phone [REDACTED]	Email	
SSN [REDACTED]	MDOC/PRN#					
Passport#	Passport Country of Issue	School undefined	School City undefined	Grade undefined	Active Military Status	
Alerts				On Probation/Parole No	Habitual Offender Status	

CR No: 190209286



Notes
Inmate housed in E-1 tested for BAC. .000

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	[REDACTED]	[REDACTED]					
Aliases		Driver License#		DL State	DL Country	Personal ID#			
#364438		[REDACTED]		MI					
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
[REDACTED]	M	[REDACTED]	[REDACTED]	undefined	undefined				
Street Address		Apt #	County	Country	Home Phone	Work Phone			
[REDACTED]					[REDACTED]				
City		State	Zip	Cell Phone	Email				
[REDACTED]		MI	[REDACTED]	UNKNOWN					
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status				
		undefined	undefined	undefined	d				
Alerts				On Probation/Parole	Habitual Offender Status				
				No					
Notes									
Inmate Housed in W1									
PBT:0.00									

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	[REDACTED]	[REDACTED]					
Aliases		Driver License#		DL State	DL Country	Personal ID#			
#426890		[REDACTED]		MI					
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
[REDACTED]	M	[REDACTED]	[REDACTED]						
Street Address		Apt #	County	Country	Home Phone	Work Phone			
[REDACTED]					[REDACTED]				
City		State	Zip	Cell Phone	Email				
[REDACTED]		MI	48329	UNKNOWN					
Alerts				On Probation/Parole	Habitual Offender Status				
				No					
Notes									
Inmate Housed in W1									
PBT:0.00									

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]									
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate			
	MS	[REDACTED]	[REDACTED]	[REDACTED]					
Aliases		Driver License#		DL State	DL Country	Personal ID#			
#233956		[REDACTED]		MI					
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
[REDACTED]	M	WHITE	[REDACTED]	undefined	undefined				
Eye Color	Hair Color	Hair Style	Hair Length	Facial Hair					
Brown	Brown								
Complexion	Build	Teeth	Height	Weight	Attire				
			5' 11"	186					
Street Address		Apt #	County	Country	Home Phone	Work Phone			

CR No: 190209286



City		State	Zip	Cell Phone	Email
██████████		MI	48329	UNKNOWN	██████████
SSN	MDOC/PRN#				
██████████	██████████				
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status
██████████	██████████	undefined	undefined	undefined	d
Alerts				On Probation/Parole	Habitual Offender Status
██████████				No	██████████
Notes					
Inmate Housed in W1					
PBT:0.00					

██████████ (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]							
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate	
	MS	██████████	██████████	██████████			
Aliases			Driver License#	DL State	DL Country	Personal ID#	
#301436			██████████	MI			
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship	
██████████	M	██████████		undefined	undefined		
Eye Color	Hair Color	Hair Style	Hair Length	Facial Hair			
Brown	Black	Afro	Short				
Complexion	Build	Teeth	Height	Weight	Attire		
			5' 5"	160			
Street Address		Apt #	County	Country	Home Phone	Work Phone	
██████████					██████████		
City	State	Zip	Cell Phone	Email			
██████████	MI	48340	UNKNOWN	██████████			
SSN	MDOC/PRN#						
██████████	██████████						
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status		
██████████	██████████	undefined	undefined	undefined	d		
Alerts				On Probation/Parole	Habitual Offender Status		
██████████				No	██████████		
Notes							
Inmate Housed in W1							
PBT:0.00							

██████████ (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]							
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate	
	MS	██████████	██████████	██████████			
Aliases			Driver License#	DL State	DL Country	Personal ID#	
#348106							
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship	
██████████	M	██████████		undefined	undefined		
Street Address		Apt #	County	Country	Home Phone	Work Phone	
██████████					UNKNOWN		
City	State	Zip	Cell Phone	Email			
██████████	MI	48030	██████████	██████████			

CR No: 190209286



Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status
		undefined	undefined	undefined	
Alerts			On Probation/Parole	Habitual Offender Status	
			No		
Notes					
Inmate Housed in W1 PBT:0.00					

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]						
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate
	MS	[REDACTED]	[REDACTED]	[REDACTED]		
Aliases		Driver License#	DL State	DL Country	Personal ID#	
#347029		[REDACTED]	MI			
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship
[REDACTED]	M	WHITE		undefined	undefined	
Eye Color	Hair Color		Hair Style	Hair Length		Facial Hair
	Brown					Unshaven/Stubble
Street Address		Apt #	County	Country	Home Phone	Work Phone
[REDACTED]					UNKNOWN	
City		State	Zip	Cell Phone	Email	
[REDACTED]		MI	48324	[REDACTED]		
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status	
		undefined	undefined	undefined		
Alerts			On Probation/Parole	Habitual Offender Status		
			No			
Notes						
Inmate house in W1 PBT:0.00						

[REDACTED] (O-OTHER) (IN-INMATE) [OSLANDEROSJ (02580)]						
PE:	W.Type:	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms Inmate
	MS	[REDACTED]	[REDACTED]	[REDACTED]		
Aliases		Driver License#	DL State	DL Country	Personal ID#	
#429563		[REDACTED]	MI			
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship
[REDACTED]	M	[REDACTED]		undefined	undefined	
Complexion	Build	Teeth	Height	Weight	Attire	
			6' 0"	205		
Street Address		Apt #	County	Country	Home Phone	Work Phone
[REDACTED]					UNKNOWN	
City		State	Zip	Cell Phone	Email	
[REDACTED]		MI	48342	UNKNOWN		
Passport#	Passport Country of Issue	School	School City	Grade	Active Military Status	
		undefined	undefined	undefined		
Alerts			On Probation/Parole	Habitual Offender Status		
			No			
Notes						
Inmate house in W1 PBT:0.00						

CR No: 190209286



Property:			
1306 - Recording - Compact Disk CD / DVD 5427 [OSLANDEROSJ (02580)]			
Property Class	IBR Type	UCR Type	
27	27 - Recordings-Audio/Visual	F - TV's, Radios, Stereos, Etc...	
Status		Count	Value
I - Information Only		1	1
Description	Disposition	Evidence Tag	
DVD copy of CR#190209286			
Recovered Date/Time	Location	Owner	
		[]	
Notes			
Inmate Block Jared #429351			
Tag#142849, Property Locker#33.			

Narrative:	
CR No: 190209286-001 Written By: OSLANDEROSJ (02580) Date: 10/24/2019 04:02 AM	
SOURCE:	
Supervisor Perry.	
INFORMATION:	
<p>At Approximately 1850 hours Deputies were assembled to conduct a cell shake down to look for contraband in the Trusty Dorm. Supervisor Perry was verbally informed by Inmate [REDACTED] (#379796) that there were inmates in Trusty Dorm making alcoholic drinks from hand sanitizer and then selling it. While conducting the cell shake down extra blankets and uniforms were also found in all cells. An unknown red liquid was found in a clear cup in cell E3(See attached Picture). Upon further investigation I smelled an odor, similar to alcohol from, the unknown red liquid. This unknown red liquid was later tested by Deputy Ogans using a Preliminary Breath Test (P.B.T). At 1937 hours the unknown red liquid was tested and indicated a positive test for alcohol. All inmates housed in the Trusty Dorm were tested using a P.B.T by Deputies Ogans and Allen. Inmate [REDACTED] refused to take the P.B.T and received a Category I Jail Infraction (ticket) for refusal to submit to a P.B.T.</p>	
INMATE MEDICAL:	
<p>While Deputies Ogans and Allen were conducting a P.B.T test in cell W2 Inmate [REDACTED] #429351 was observed laying down on his bunk and was ordered multiple times to get out of his bunk and exit the cell for a P.B.T. Inmate [REDACTED] did not respond to the orders he was given and Deputy Ogans, Allen, Pelt and Otto approached Inmate Block and attempted to wake him up, to which he did not respond. Inmate [REDACTED] was assisted from his bunk to the floor by Deputies Ogans, Otto, Allen, and Burke. Deputy Ogans then attempted to get vitals signs on Inmate [REDACTED] but was unsuccessful at finding a good pulse. Clinic staff was called via the prep radio to step over to W2 to access Inmate [REDACTED] due to him having a faint pulse. Medical personnel Vicki Warren, Danielle Veatch, Karen Kachadurian, Adrian Williams, and Tyler Winchel all arrived to W2. Inmate [REDACTED] was accessed by medical personnel in the cell. Per medical</p>	

CR No: 190209286



staff Inmate was to be taken down to the clinic for medical management. Inmate [REDACTED] was placed on the Mega Mover and transported to the clinic by Deputies Otto, Ogans, Burke, Ganey, and Summers. Per Registered Nurse Warren, Inmate [REDACTED] was to be transported by STAR Advanced Ambulance to St. Joseph Mercy Oakland Hospital due to Inmate [REDACTED] being unresponsive. STAR was contacted by Supervisor Hall at 1923 Hours. STAR arrived at approximately 1940 hours and Inmate [REDACTED] was transported by Deputies Kajy and Alee via ambulance to St. Joseph Mercy Oakland Hospital. A DVD copy of Inmate [REDACTED] being transported to the clinic on the Mega Mover was burned and placed in Property Locker #33 with tag#142849.

ADDITIONAL INFORMATION:

The following inmates tested positive for alcohol when given a P.B.T

[REDACTED] #361346 P.B.T results .059

Inmate was issued a Category I Jail Infraction for possession of alcohol (Hand Sanitizer).

Inmate was given a witness statement. See attached witness statement for further information.

Inmate was read and given Advise of Rights. See attached.

[REDACTED] #360121 P.B.T results .099

Inmate was issued a Category I Jail Infraction for possession of alcohol (Hand Sanitizer).

Inmate was given a witness statement. See attached witness statement for further information.

Inmate was read and given Advise of Rights. See attached.

[REDACTED] #423888 P.B.T results .045

Inmate was issued a Category I Jail Infraction for possession of alcohol (Hand Sanitizer).

Inmate was given a witness statement. See attached witness statement for further information.

Inmate was read and given Advise of Rights. See attached.

[REDACTED] #360716 P.B.T results .091

Inmate was issued a Category I Jail Infraction for possession of alcohol (Hand Sanitizer).

Inmate was given a witness statement. See attached witness statement for further information.

Inmate was read and given Advise of Rights. See attached.

[REDACTED] #379796 refused P.B.T

Inmate was issued a Category I Jail Infraction for possession of alcohol (Hand Sanitizer).

Inmate was issued a Category I Jail Infraction for refusal to submit to a Preliminary Breath Test (P.B.T).

Inmate was given a witness statement. See attached witness statement for further information.

Inmate was read and given Advise of Rights. See attached.

ACTION TAKEN:

Supervisor Perry, Sergeant Jordan and Sergeant Whiting were all present, who then notified Classification Supervisor Marra of the incident. Lieutenant Miles was also notified of the incident.. Per Supervisor Marra, all inmates who tested positive in the P.B.T were to be re-classed to the receiving tanks and removed from Trusty status pending the results of their ticket hearings. All Category I Jail Infractions for Possession of Alcohol (hand Sanitizer) were signed by Sergeant Bishop and Supervisor Perry.

CR No: 190209286



All property from the inmates who received tickets were bagged, tagged and placed in the property room. All locks and laundry bags were collected from inmates being re-classed. All inmates who received tickets signed the ticket and were provided the white copy. Inmate ██████████ #361346 refused to sign the ticket and was provided the white copy. Supervisor Perry stated he would review video footage. Deputy Allen stated he would conduct the interviews. Event placed into IMACS.

STATUS: Closed Pending ticket hearing.

CR No: 190209286-002 Written By: OSALLENE (02292) Date: 10/23/2019 11:53 PM

INTERVIEW WITNESS ██████████ #361346: Inmate ██████████ was advised of his rights and chose to waive his rights. ██████████ stated he had heard rumors of people drinking. He went to cell E3 and tried a drink from ██████████ ██████████ said they were using hand sanitizer and salt from the loading docks, then filtering it threw hair nets to make a form of alcohol. See witness statement attached.

INTERVIEW WITNESS ██████████ #423888: Inmate ██████████ was advised of his rights and chose to waive his rights. Lanvers stated Tom offered him a drink in a plastic cup. He took a couple drinks and asked what it was. ██████████ told ██████████ it was liquor, pepsi, and koolaid. ██████████ said he went to bed after and woke up to the cell being raided. See witness statement attached.

INTERVIEW WITNESS ██████████ #360716: Inmate ██████████ was advised of his rights and chose to waive his rights. ██████████ stated he woke up when the shake down started. He has only heard rumors of people drinking hand sanitizer but never seen it in person. He also told me he has made alcohol with fruit but said he doesn't know how they do it with hand sanitizer. ██████████ denied ever having tried any alcohol in trusty dorm. See witness statement attached.

INTERVIEW WITNESS ██████████ #360121: Inmate ██████████ was advised of his rights and chose to waive his rights. ██████████ stated he went back to cell E3 because he heard they had alcohol. he had a couple of drinks right before the shake down. See witness statement attached.

INTERVIEW WITNESS ██████████ #379796: Inmate ██████████ was advised of his rights and chose to waive his rights. ██████████ stated ██████████ and ██████████ have been making liquor using hand sanitizer and salt. The salt comes from the loading docks and the hand sanitizer comes from the cabinet behind the desk in trusty dorm. See witness statement

CR No: 190209286



attached.

CR No: 190209286-003 Written By: OSPERRYW (00967) Date: 10/24/2019 02:11 AM

SUPPLEMENTAL INFORMATION: Inmate ██████████ #379796 approached me at approximately 6:00 PM. and wanted me to know that there were people in the dorm making alcoholic drinks from hand sanitizer and selling it. As he was speaking to me, there was an odor of intoxicants coming from his breath. Nowacek's speech was slurred' his eyes were bloodshot, and he was swaying as he stood in front of me. I asked how much he had to drink, and he said "Just a little". He told me the midnight laundry guys ██████ (██████ #360716) and ██████ (██████ #421754) were making and selling the liquid. He also told me that they were drunk in E-3, and someone was drunk on the west side.

I told Deputies Landeros and Allen what I was told and went to the Sergeant's office and spoke with Sgt. Jordan. Soon after this, the Sergeant was able to get CET members together to start a "shake down" in the dorm. All inmates currently in the dorm were given a P.B.T. During the search it was learned that 6 inmates had been drinking. All cells were searched.

CR No: 190209286-004 Written By: OSPELTD (02136) Date: 10/25/2019 07:17 PM

Supplemental Report: After speaking with Deputy Allen about his interviews with the inmates, Deputy Allen told me that they had used ice melting rock salt to separate the alcohol from the hand sanitizer from the loading dock by the kitchen. Due to my work location being the kitchen five days a week, I looked at camera footage to see when the salt was taken. On the date of 10/19/2019 at 6:07 am, Inmate ██████████ #423888 was seen on camera taking ice melting salt out of the bin. A DVD copy if this footage was placed in evidence under tag #142889 and locker 33. Because this happened I spoke with day shift Deputy Muhlitrer about putting locks on the salt bin. as of 10/25/2019 there is now two pad locks to keep the salt secure.

Attachments:					
File Name	File Type	Comments	Date	By	Role
Attachments Included In This Report:					
Red Liquid Drink.jpg	pjpeg	Red Liquid Drink	10/24/2019 08:11 PM	LANDEROS, JORGE	POLICEOFFICER
Advise of Rights.pdf	pdf	Advise of rights	10/24/2019 07:43 PM	LANDEROS, JORGE	POLICEOFFICER
Category I Infractions.pdf	pdf	Category I Infractions	10/24/2019 07:57 PM	LANDEROS, JORGE	POLICEOFFICER
Witness Statement.pdf	pdf	Witness Statements	10/24/2019 07:57 PM	LANDEROS, JORGE	POLICEOFFICER

EXHIBIT E

CRIMINAL HISTORY OF AFFIANTS

RAJ LEE (DYLON LEE)

Incident Date: 04/09/2014

- Count 1, Felony Home Invasion – 2nd Degree: **Found Guilty**
- Count 2, Ordinance Violation Home Invasion – 2nd Degree: **Found guilty**

Incident Date: 07/26/2016

- Count 1, Felony Weapons – Firearms – Possession By Felony: **Pled Guilty**
- Count 2, Felony Weapons-Carrying Concealed: **Pled Guilty**

Incident Date: 02/09/2017

- Count 1, Felony Stolen Property – Receiving and Concealing – Motor Vehicle: **Found Guilty**

Incident Date: 11/15/2019

- Count 1, Felony Uttering and Publishing Counterfeit Bills or Notes: **Pled Guilty**

CRIMINAL HISTORY OF AFFIANTS

DAVID KUCHARSKI

Incident Date: 04/05/1999

- Count 1, Felony Stolen Property-Receiving/Concealing-\$1,000 Or More But Less Than \$20,000: **Pled Guilty**
- Count 2, Felony Police Officer – Fleeing – Third Degree – Penal Code: **Pled Guilty**
- Count 3, Felony Malicious Destruction Fire/Police Property: **Pled Guilty**

Incident Date: 09/30/1999

- Count 1, Attempt-Felony Home Invasion – 1st Degree: **Pled Guilty**

Incident Date: 03/28/2002

- Count 1, Felony Malicious Destruction Fire/Police Property: **Pled Guilty**
- Count 2, Felony Financial Transaction Device – Possession: **Pled Guilty**
- Count 3, Felony Financial Transaction Device – Possession: **Pled Guilty**
- Count 4, Felony Escape – Awaiting Trial For Misdemeanor: **Pled Guilty**
- Count 5, Misdemeanor Operating – License – Forgery/Alteration/False ID: **Pled Guilty**
- Count 6, Misdemeanor Operating – No License/Multiple Licenses: **Pled Guilty**

Incident Date: 06/08/2002

- Count 1, Felony Malicious Destruction Fire/Police Property: **Pled Guilty**
- Count 2, Felony Financial Transaction Device – Possession: **Pled Guilty**
- Count 3, Felony Financial Transaction Device – Possession: **Pled Guilty**
- Count 4, Felony Escape – Awaiting Trial For Misdemeanor: **Pled Guilty**
- Count 5, Misdemeanor Operating – License – Forgery/Alteration/False ID: **Pled Guilty**
- Count 6, Misdemeanor Operating – No License/Multiple Licenses: **Pled Guilty**

Incident Date: 05/04/2004

- Count 1, Felony Larceny In A Building: **Pled Guilty**
- Count 2, Misdemeanor License Plate/Registration/Title – Unlawful Use: **Pled Guilty**
- Count 3, Misdemeanor Operating – No License/Multiple Licenses: **Pled Guilty**

Incident Date: 12/08/2004

- Count 1, Misdemeanor Assault or Assault and Battery: **Pled Guilty**

Incident Date: 03/19/2005

- Count 1, Felony Home Invasion – 2nd Degree: **Pled Guilty**

CRIMINAL HISTORY OF AFFIANTS

DAVID KUCHARSKI (Continued)

Incident Date: 02/26/2010

- Count 1, Attempt-Felony Breaking & Entering – A Building With Intent: **Pled Guilty**

Incident Date: 04/10/2011

- Count 1, Felony Home Invasion – 1st Degree: **Pled Nolo Contendere**
- Count 2, Felony Breaking & Entering – A Building With Intent: **Pled Nolo Contendere**

Incident Date: 01/13/2017

- Count 1, Felony Controlled Substance-Possess (Cocaine, Heroin or Another Narcotic) Less Than 25 Grams: **Pled Guilty**

Incident Date: 03/27/2019

- Count 1, Felony Tampering With Electronic Monitoring Device: **Pled Guilty**

Incident Date: 02/11/2020

- Count 1, Misdemeanor Retail Fraud – 2nd Degree: **Pled Guilty**

CRIMINAL HISTORY OF AFFIANTS

JAMAAL CAMERON

Incident Date: 02/13/2004

- Count 1, Misdemeanor Operating-License Suspended, Rev, Denied/Allowing Susp Person To Operate-2nd Or Sub Off: **Pled Guilty**

Incident Date: 03/11/2004

- Count 1, Felony Uttering And Publishing: **Pled Guilty**

Incident Date: 04/09/2004

- Count 1, Felony Uttering And Publishing: **Pled Guilty**
- Count 2, Felony Uttering And Publishing: **Pled Guilty**

Incident Date: 06/10/2004

- Count 1, Felony Uttering And Publishing: **Pled Guilty**

Incident Date: 02/09/2014

- Count 1, Misdemeanor Operating-License Suspended, Rev, Denied/Allowing Susp Person To Operate-2nd Or Sub Off: **Pled Guilty**

Incident Date: 09/05/2019

- Count 1, Felony Weapons-Carrying Concealed: **Pled Guilty**

CRIMINAL HISTORY OF AFFIANTS

MATTHEW SAUNDERS

Incident Date: 03/17/1997

- Count 1, Felony Motor Vehicle-Unlawful Driving Away: **Juvenile Adjudication**

Incident Date: 06/01/1998

- Count 1, Felony Motor Vehicle-Unlawful Driving Away: **Juvenile Adjudication**
- Count 3, Felony Motor Vehicle-Unlawful Driving Away: **Juvenile Adjudication**
- Count 4, Felony, Breaking & Entering – A Vehicle To Steal Property Over \$5: **Juvenile Adjudication**
- Count 8, Felony Motor Vehicle-Unlawful Driving Away: **Juvenile Adjudication**
- Count 9, Felony, Breaking & Entering – A Vehicle To Steal Property Over \$5: **Juvenile Adjudication**

Incident Date: 02/21/2001

- Count 1, Felony Armed Robbery: **Pled Guilty**
- Count 3, Felony Weapons Felony Firearm: **Pled Guilty**

Incident Date: 04/24/2001

- Count 1, Felony Home Invasion – 1st Degree: **Pled Guilty**
- Count 2, Felony Motor Vehicle-Unlawful Driving Away: **Pled Guilty**
- Count 3, Felony Police Officer – Fleeing – Third Degree – Vehicle Code: **Pled Guilty**
- Count 4, Felony Stolen Property-Receiving/Concealing-\$1,000 Or More But Less Than \$20,000: **Pled Guilty**
- Count 5, Misdemeanor Failure To Stop At Scene Of A Personal Injury Accident: **Pled Guilty**
- Count 6, Felony Breaking & Entering – A Vehicle With Damage To Vehicle: **Pled Guilty**
- Count 7, Felony Breaking & Entering – A Vehicle With Damage To Vehicle: **Pled Guilty**

CRIMINAL HISTORY OF AFFIANTS

JASON ARSINEAU

Incident Date: 09/04/2001

- Count 1, Ordinance Violation Operating – Impaired: **Pled Guilty**

Incident Date: 09/26/2013

- Count 3, Misdemeanor Domestic Violence: **Pled Guilty**

Incident Date: 09/13/2019

- Count 1, Felony Operating – While Intoxicated/Impaired – 3rd Offense Notice: **Pled Guilty**

CRIMINAL HISTORY OF AFFIANTS

RICHARD BRIGGS

Incident Date: 11/01/2003

- Count 1, Felony Motor Vehicle-Unlawful Driving Away: **Found Guilty**
- Count 2, Felony Stolen Property – Receiving and Concealing – Motor Vehicle: **Found Guilty**
- Count 4, Felony Police Officer – Fleeing – Second Degree – Vehicle Code: **Found Guilty**

Incident Date: 06/11/2004

- Count 1, Felony Police Officer – Fleeing – Second Degree – Vehicle Code: **Pled Guilty**
- Count 2, Felony Stolen Property – Receiving and Concealing – Motor Vehicle: **Pled Guilty**
- Count 3, Attempt-Felony Motor Vehicle-Unlawful Driving Away: **Pled Guilty**
- Count 4, Misdemeanor Operating – License Suspended, Revoked, Denied: **Pled Guilty**

Incident Date: 02/26/2007

- Count 1, Attempt-Felony Motor Vehicle-Unlawful Driving Away: **Pled Guilty**

Incident Date: 04/27/2019

- Count 2, Ordinance Violation Operating Without A License On Person: **Pled Guilty**

CRIMINAL HISTORY OF AFFIANTS

MICHAEL BATES

Incident Date: 06/07/2006

- Count 1, Ordinance Violation Operating – License Suspended, Revoked, Denied: **Pled Guilty**

Incident Date: 06/04/2011

- Count 1, Ordinance Violation Police Officer – Assaulting/Resisting/Obstructing: **Pled Guilty**
- Count 2, Ordinance Violation Disorderly Person: **Pled Guilty**

Incident Date: 07/28/2019

- Count 2, Misdemeanor Alcohol – Open Container In Vehicle: **Pled Guilty**
- Count 3, Misdemeanor Larceny - \$200 Or More But Less Than \$1,000: **Pled Guilty**

Incident Date: 08/09/2019

- Count 1, Felony Larceny – From A Motor Vehicle: **Pled Guilty**
- Count 2, Felony Stolen Property-Receiving/Concealing-\$1,000 Or More But Less Than \$20,000: **Pled Guilty**

CRIMINAL HISTORY OF AFFIANTS

MICHAEL CAMERON

Incident Date: 08/04/1994

- Count 1, Felony Stolen Property-Receive & Conceal in Excess of \$100: **Pled Guilty**
- Count 2, Felony Motor Vehicle-Unlawful Driving Away: **Pled Guilty**
- Count 3, Felony Stolen Property-Receive & Conceal in Excess of \$100: **Pled Guilty**
- Count 4, Felony Motor Vehicle-Unlawful Driving Away: **Pled Guilty**
- Count 5, Felony Stolen Property-Receive & Conceal in Excess of \$100: **Pled Guilty**

Incident Date: 10/05/1998

- Count 1, Misdemeanor Operating-Suspended or Revoked License: **Pled Guilty**

Incident Date: 04/07/1999

- Count 3, Felony Assault with Dangerous Weapon: **Pled Guilty**

Incident Date: 01/30/2000

- Count 1, Attempt-Misdemeanor Assault with Dangerous Weapon: **Pled Guilty**

Incident Date: 02/12/2015

- Count 1, Misdemeanor Domestic Violence: **Pled Nolo Contendere**

Incident Date: 08/15/2018

- Count 1, Felony Controlled Substance-Possess (Cocaine, Heroin or Another Narcotic) Less Than 25 Grams: **Pled Guilty**

Incident Date: 02/13/2019

- Count 1, Felony Controlled Substance-DEL/MFG (Cocaine, Heroin or Another Narcotic) Less Than 50 Grams: **Pled Guilty**
- Count 2, Felony Controlled Substance-Possess (Cocaine, Heroin or Another Narcotic) Less Than 25 Grams: **Pled Guilty**

EXHIBIT F

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT

JAMAAL CAMERON; RICHARD
BRIGGS; RAJ LEE; MICHAEL
CAMERON; MATTHEW
SAUNDERS, individually and on
behalf of all others similarly situated,

Case 2:20-cv-10949-LVP-MJH

Plaintiffs,

v.

MICHAEL BOUCHARD, in his
official capacity as Sheriff of Oakland
County; CURTIS D. CHILDS, in his
official capacity as Commander of
Corrective Services; OAKLAND
COUNTY, MICHIGAN,

Defendants.

AFFIDAVIT OF VICKI-LYN WARREN

VICKI-LYN WARREN, being first duly sworn, deposes and states:

1. That this Affidavit is made of my own personal knowledge and that if I am sworn to testify, I can give competent testimony of my own personal knowledge in support of each paragraph of this Affidavit.
2. That I have been employed by Wellpath since March 1, 2012. Wellpath is an outside contractor for the Oakland County Sheriff's Office. Wellpath provides medical and dental services for the inmate population at the Oakland County

Jail. At all times relevant to the instant action I have worked as the Health Services Administrator for the Oakland County Jail since 2014.

3. With regard to inmates' communication with the medical staff, sick call slips are distributed to the inmates daily and picked up every morning by medical staff. Sick call slips are the protocol for inmates to self-report COVID-19 symptoms and any other problem they have. Individuals who are displaying COVID-19 symptoms are seen daily by the medical staff and assessed accordingly. A full set of vitals is taken once per day. Temperature is taken by the day, afternoon and midnight medical shifts and therapeutics are administered as needed.
4. On Monday-Friday, each housing area in the facility is visited by a doctor or nurse practitioner at which time they are constantly interacting with the inmate population and providing lengthy verbal education regarding the importance of self-reporting COVID-19 symptoms.
5. No inmate is charged any amount of money for the treatment of COVID-19. Nor is any inmate charged with filing a medical grievance.
6. All emergencies, including all COVID-19 emergencies are responded to immediately.
7. With regard to inmate Jamaal Cameron, Mr. Cameron denied all medical conditions during his intake on March 20, 2020.

8. On April 1, 2020, Mr. Cameron submitted a sick call slip stating, “a guy in my cell says I stop breathing when I sleep”. Mr. Cameron never disclosed a sleep apnea issue during intake.
9. With regard to inmate Richard Briggs, on March 29, 2020, Mr. Briggs complained of not feeling well. He was evaluated by an EMT and had a temperature of 98.7. His oxygen saturation level was 98%. On April 2, 2020, during the afternoon medication pass, he yelled out that he had Coronavirus. When the medical staff went to evaluate him, he refused to allow the NP to see him. He demanded that he should go to the hospital and told us that he had a Constitutional right to visit the hospital whenever he wanted. Mr. Briggs has never exhibited any symptoms associated with Coronavirus.
10. With regard to inmate Michael Cameron, although Mr. Cameron’s affidavit states that he suffers from hypertension, cardiac disease and obesity, he did not disclose any of those diseases during this medical pre-screening at the time of intake. Additionally, contrary to Mr. Cameron’s affidavit, no one in the East Annex has reported symptoms of COVID-19, including Mr. Cameron.
11. With regard to inmate Raj Lee (a/k/a Dylon Lee), Mr. Lee is correct that inmates in the East Annex receive a 30 day supply of their prescribed medication in order to eliminate unnecessary contact and the inmate population.

12. With regard to inmate David Kucharski, Mr. Kucharski denied suffering from asthma at intake. Mr. Kucharski has never submitted a single sick call slip to the medical staff. He has been tested twice for the flu with negative results because he was identified as a contact to flu.
13. With regard to Jason Arsineau, Mr. Arsineau never submitted a medical slip to be seen by medical staff even though the medical staff pass out and pick up medical slips daily and are in the housing areas several times per day.
14. With regard to the inmates housed in the East Annex, no one has reported any COVID-19 symptoms to medical staff. Additionally, the correctional staff has not reported any inmate with COVID-19 symptomology to the medical staff.
15. As of Saturday, April 18, 2020, 242 inmates have been tested for COVID-19. Of this number 36 have tested positive. Five (5) positives have been released from custody, seven (7) have recovered and returned to general population, 24 are still quarantined in the 2E Pod which is the COVID positive quarantine area. Twenty-four test results are still outstanding. No inmate housed at the East Annex has tested positive for COVID-19.
16. That the total number of inmates quarantined as of April 18, 2020 in the jail is 315.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

Further, Affiant sayeth not.

Dated: April 19, 2020

/s/Vicki-Lyn Warren

VICKI-LYN WARREN

*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above Affidavit. I am an attorney admitted to the Eastern District of Michigan. On April 19, 2020, I personally spoke with VICKI-LYN WARREN and read this Affidavit to him. VICKI-LYN WARREN told me that the information in the above Affidavit is true, and gave me verbal consent to sign on her behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/Steven M. Potter (P33344)

Steven M. Potter (P33344)

Attorney for Defendants

EXHIBIT G



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 6, 2018

Jamie N. Venable
Regulatory Affairs Specialist
1110 Spartan Drive
Maumee, OH 43537

Subject: CSF Notification per PRN 98-10 – Add ABN and Alternate CSF 2
Product Name: DMQ
EPA Registration Number: 5741-20
Application Date: March 20, 2018
Decision Number: 539882 & 539886

Dear Ms. Venable:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The CSFs submitted with your application have been stamped “Notification” and placed in our files.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 11/29/2007
- Alternate CSF 1 dated 11/29/2007
- Alternate CSF 2 dated 03/28/2018

Any CSFs other than those listed above are superseded/no longer valid.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

The alternate brand name X-Effect has been added to the product record.

If you have any questions, please contact Mohammad Alavi at (703) 347-0522 or by email at Alavi.mohammad@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Eric Miederhoff".

Eric Miederhoff
Product Manager 31
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

Master Label for DMQ EPA Reg. No. 5741-20
Spartan Chemical Company, Inc. 5/23/2018

Page 1 of 7

Front Copy

DMQ®
(Damp Mop Neutral Disinfectant Cleaner)
(Non-Acid Disinfectant Bathroom Cleaner)
(Neutral Cleaner Disinfectant with Fresh Lavender Fragrance)
(text in parenthesis is optional)

[Alternate Brand Names]
NABC Concentrate
X-Effect

Clean on the Go® 1
For use only with Spartan Clean on the Go dispenser.

Non-alkaline disinfectant cleaner concentrate specially designed to clean and disinfect high gloss floors!
Non-acid disinfectant cleaner concentrate specially designed to clean and disinfect toilet bowls and restroom surfaces!

Sanitizer at 2 oz. per gallon.
30 Second Sanitizing Activity!
Sanitizes in 30 Seconds
Bactericide/Virucide*
Effective against Antibiotic-Resistant Bacteria**
Kills 99.9% of bacteria*** in 30 Seconds.

Kills Staphylococcus aureus and Salmonella enterica.
*Kills Hepatitis C Virus (HCV), Hepatitis B Virus (HBV), HIV-1 (AIDS Virus), Herpes simplex Virus Type 2 and Influenza A₃/Hong Kong viruses on hard, nonporous inanimate surfaces.
**Kills Staphylococcus aureus-MRSA and Enterococcus faecalis-VRE.
***Staphylococcus aureus and Enterobacter aerogenes

(Note to EPA, the following kill claim expression is optional:)
Kills Staphylococcus aureus (ATCC 6538) and Salmonella enterica (ATCC 10708).
*Kills Hepatitis C Virus (HCV), Hepatitis B Virus (HBV), HIV-1 (AIDS Virus), Herpes simplex Type 2 and Influenza A₃/Hong Kong viruses on hard, nonporous inanimate surfaces.
**Kills Staphylococcus aureus-MRSA (ATCC 33593) and Enterococcus faecalis-VRE (ATCC 51575).
***Staphylococcus aureus and Enterobacter aerogenes (ATCC 13048)

ACTIVE INGREDIENT:	
Alkyl (C ₁₄ -50%, C ₁₂ -40%, C ₁₆ -10%)	
dimethyl benzyl ammonium chlorides.....	4.50%
INERT INGREDIENTS:	95.50%
TOTAL:	100.00%

E.P.A. Reg. No. 5741-20 E.P.A. Est. No. 5741-OH-1

Keep Out of Reach of Children
DANGER
See side panel for additional precautionary statements.

FOR COMMERCIAL AND INDUSTRIAL USE
SPARTAN CHEMICAL COMPANY, INC., 1110 Spartan Drive, Maumee, Ohio 43537

NET CONTENTS:

NOTIFICATION

5741-20

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

08/06/2018

Master Label for DMQ
Spartan Chemical Company, Inc.

EPA Reg. No. 5741-20
5/23/2018

Page 2 of 7

Back Side Copy

DMQ®
(Damp Mop Neutral Disinfectant Cleaner)
(Non-Acid Disinfectant Bathroom Cleaner)
(Neutral Cleaner Disinfectant with Fresh Lavender Fragrance)
(text in parenthesis is optional)

[Alternate Brand Names]
NABC Concentrate
X-Effect

DMQ retains the beauty of high gloss floors with the added effectiveness of a disinfectant!

Formulated for use in daily maintenance programs, (DMQ)(Product Name) is a proven one-step cleaner disinfectant in the presence of moderate amounts of organic soil.

This product [or product name] is a non-acid formulation designed to disinfect, sanitize, clean and deodorize [insert surfaces] [and]. This product [or product name] is for use [throughout] [the] [in] [and] [Insert use sites]

This product [or product name] is used to clean, disinfect, sanitize, and deodorize [Insert Surfaces] [throughout] [the] [in] [and] [Insert use sites]

This product [or product name] is a non-acid formulation designed to disinfect, sanitize, clean and deodorize [Insert Surfaces] [throughout] [the] [in] [and] [Insert use sites]

[Surfaces:]

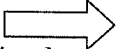
Countertops, floors, walls, glazed ceramic tile, glazed porcelain, shower walls, toilet bowls, urinals, chrome, shower curtains and doors, vanity tops, tub and sink surfaces and fixtures, bathtubs, showers, sinks, fiberglass, synthetic marble, stainless steel, glass, vinyl, other hard nonporous bathroom surfaces, other hard, non-porous environmental surfaces.

[Use Sites:]

Schools, public buildings, restaurants, bars, cafeterias, office buildings, transportation terminals, lodging/hospitality establishments, hotels, motels, churches, factories, manufacturing sites/facilities, food processing plants, apartment buildings, athletic/recreation facilities, public restrooms, homes, home, bathroom, bathrooms, restrooms.

(DMQ)(Product Name) provides 700 ppm of quaternary germicide at use-dilution.

(Note to EPA, the following phrases within brackets are optional)

[Reorder Point] 
[Reorder Information:]
[(Company name & address)]
[(Phone number)]
[(Website address)]

Directions for Use:

Master Label for DMQ
Spartan Chemical Company, Inc.

EPA Reg. No. 5741-20
5/23/2018

Page 3 of 7

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Preliminary cleaning is required for heavily soiled areas.

One-Step Cleaning and Disinfecting Toilet Bowls and Urinals

1. Remove water from the bowl by forcing it over the trap with a swab mop.
2. Liberally apply (DMQ)(Product Name) at 2 oz. per gallon of water to the exposed surfaces. Swab the exposed surfaces including under the rim.
3. Allow (DMQ)(Product Name) to remain wet on surfaces for 10 minutes.
4. Flush toilet or urinal and rinse swab mop thoroughly.

One-Step Cleaning/Deodorizing/Disinfecting Hard, Non-Porous Surfaces:

For one-step cleaning, deodorizing, and disinfecting in the presence of 5% organic soil use (DMQ)(Product Name) at 2 oz. per gallon of water. Apply with a mop, cloth or coarse spray device. Treated surface must remain wet for 10 minutes. Allow to air dry or wipe off with a clean cloth or paper towel.

Cleaning, Sanitizing and Deodorizing Hard Non-Porous Surfaces:

Use (DMQ)(Product Name) at 2 oz. per gallon of water. Apply with a mop, cloth or coarse spray device. Treated surface must remain wet for 30 seconds. Wipe off with a clean cloth or allow to air dry. When used as directed for sanitization this product is effective against Staphylococcus aureus and Enterobacter aerogenes.

Prepare fresh solution daily or more often if solution becomes visibly dirty, diluted, or soiled. Rinsing of floors is not necessary except before application of a floor finish or polish.

Before using this product in food processing areas, all food products and packaging materials must be removed from the room or carefully protected. After use, all food contact surfaces must be thoroughly rinsed with potable water before reuse. Do not use this product to disinfect or clean utensils, glasses, dishes, or cookware.

*KILLS HCV, HBV AND HIV ON PRE-CLEANED ENVIRONMENTAL SURFACES/OBJECTS PREVIOUSLY SOILED WITH BLOOD/BODY FLUIDS in settings in which there is an expected likelihood of soiling of inanimate surfaces/objects with blood or body fluids, and in which the surfaces/objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of Hepatitis C Virus (HCV), Hepatitis B Virus (HBV) and human immunodeficiency virus Type 1 (HIV-1) (associated with AIDS).

SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HCV, HBV AND HIV-1 ON SURFACES OR OBJECTS SOILED WITH BLOOD/BODY FLUIDS:

PERSONAL PROTECTION: Exposure to blood or body fluids must be avoided by use of barrier protection such as latex or other impervious gloves. Face shields and impervious gowns must also be worn if splashing of blood or body fluids may occur.

CLEANING PROCEDURES: Blood and other body fluids must be thoroughly cleaned from surfaces and objects before application of (DMQ)(Product Name).

CONTACT TIME: Leave surfaces wet for 10 minutes.

DISPOSAL OF INFECTIOUS MATERIAL: Contaminated cleaning materials, blood and other body fluids must be autoclaved and/or disposed of according to local regulations for infectious waste disposal.

Master Label for DMQ
Spartan Chemical Company, Inc.

EPA Reg. No. 5741-20
5/23/2018

Page 4 of 7

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER. Corrosive. Causes irreversible eye damage. Harmful if absorbed through the skin. Harmful if swallowed. Do not get in eyes, skin or on clothing. Wear protective eye wear (goggles/face shield/safety glasses), rubber gloves and protective clothing. *After product is diluted in accordance with the directions for use, protective eye wear is not required.* Wash thoroughly with soap and water after handling and before eating, drinking, smoking tobacco, chewing gum, or using the toilet. Remove contaminated clothing and wash clothing before reuse.

(NOTE TO EPA -The following text will be used on five gallon pails and larger containers only)

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

FIRST AID

If in eyes:	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
If on skin:	-Take off contaminated clothing. -Rinse skin immediately with plenty of water for 15-20 minutes. -Call a poison control center or doctor for treatment advice.
If swallowed:	-Call a poison control center or doctor immediately for treatment advice. -Have person sip a glass of water if able to swallow. -Do not induce vomiting unless told to do so by a poison control center or doctor. -Do not give anything by mouth to an unconscious person.
24 HOUR MEDICAL EMERGENCY NUMBER: 888- 314-6171	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

(NOTE TO EPA -The following text will be used with packets containing 2 fl .oz or less of product)

DISPOSAL: Do not reuse empty packet. Discard in trash.

(NOTE TO EPA –

The following text will be used on containers of 1 gallon or less which are unable to be rinsed.)

STORAGE AND DISPOSAL

Master Label for DMQ
Spartan Chemical Company, Inc.

EPA Reg. No. 5741-20
5/23/2018

Page 5 of 7

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry area inaccessible to children.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Replace cap and discard in trash.

(NOTE TO EPA –

The following text will be used on containers of 5 gallons or less which are rinsable.)

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry area inaccessible to children.

Pesticide Disposal: Pesticide wastes may be hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: Nonrefillable container. Do not reuse or refill container. Triple rinse as follows: Fill container ¼ full with water and recap. Shake for 10 seconds. Drain for 10 seconds after the flow begins to drip. Follow Pesticide Disposal instructions for rinsate disposal. Repeat procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

(NOTE TO EPA – The following text will be used on containers of 5 gallons or greater)

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry area inaccessible to children.

Pesticide Disposal: Pesticide wastes may be hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: Nonrefillable container. Do not reuse or refill container. Triple rinse as follows: Fill container ¼ full with water. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn container over onto its other end and tip it back and forth several times. Follow Pesticide Disposal instructions for rinsate disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill

SPARTAN CHEMICAL COMPANY, INC. 1110 Spartan Drive, Maumee, Ohio 43537
Questions? 800-537-8990/ www.spartanchemical.com

(Note to EPA: The following is an optional phrase)

Fax On Demand Material Safety Data Sheet: 888-383-4666, No. (XXXX)

Master Label for DMQ
Spartan Chemical Company, Inc.

EPA Reg. No. 5741-20
5/23/2018

Page 6 of 7

Secondary Container Label for Diluted Product

DMQ®
(Damp Mop Neutral Disinfectant Cleaner)
(Non-Acid Disinfectant Bathroom Cleaner)
(Neutral Cleaner Disinfectant with Fresh Lavender Fragrance)
(text in parenthesis is optional)

[Alternate Brand Names]
NABC Concentrate
X-Effect

User Prepared Ready-To-Use Solution

E.P.A. Reg. No. 5741-20

ACTIVE INGREDIENT IN CONCENTRATED PRODUCT:

Alkyl (C₁₄-50%, C₁₂-40%, C₁₆-10%) dimethyl benzyl ammonium chlorides... 4.50%

The product in this container is diluted as directed on the pesticide product label.
Follow the directions for use on the pesticide label when applying this product. The product in this container with pesticide is not for sale and is for storage and use.

(Optional phrases)
Read material safety data sheet before using.
See first aid statement on pesticide product label.

KEEP OUT OF REACH OF CHILDREN

Harmful if absorbed through the skin. Harmful if swallowed. Do not get in eyes, skin or on clothing.
Wash thoroughly with soap and water after handling and before eating, drinking, smoking tobacco,
chewing gum, or using the toilet. Remove contaminated clothing and wash clothing before reuse.

MEDICAL EMERGENCY: 888-314-6171

SPARTAN CHEMICAL COMPANY, INC.
1110 Spartan Drive, Maumee, Ohio 43537
1-800-537-8990/ www.spartanchemical.com

Master Label for DMQ
Spartan Chemical Company, Inc.

EPA Reg. No. 5741-20
5/23/2018

Page 7 of 7

(Packet Label -2 fl. oz. or less)

DMQ®
(Damp Mop Neutral Disinfectant Cleaner)
(Non-Acid Disinfectant Bathroom Cleaner)
(Neutral Cleaner Disinfectant with Fresh Lavender Fragrance)
(text in parenthesis is optional)

[Alternate Brand Names]
NABC Concentrate
X-Effect

Add contents of packet to XXX of water for a 1:64 dilution.

ACTIVE INGREDIENT:	
Alkyl (C ₁₄ -50%, C ₁₂ -40%, C ₁₆ -10%) dimethyl benzyl ammonium chlorides.....	4.50%
INERT INGREDIENTS:	<u>95.50%</u>
TOTAL:	100.00%

Keep Out of Reach of Children
DANGER

EPA Reg. No. 5741-20 EPA Est. No. 5741-OH-1

SEE OUTER CONTAINER FOR PRECAUTIONARY STATEMENTS AND USE DIRECTIONS.

DISPOSAL: Do not reuse empty packet. Discard in trash.

FOR COMMERCIAL AND INDUSTRIAL USE
SPARTAN CHEMICAL COMPANY, INC.,
1110 Spartan Drive, Maumee, Ohio 43537
1-800-537-8990 /www.spartanchemical.com

NET CONTENTS:

EXHIBIT H

COUNTY OF OAKLAND
OFFICE OF THE SHERIFF

MICHAEL J. BOUCHARD



Here is updated information on some of the steps we are continuing to take here in the jail. These steps have been implemented to try and keep the coronavirus from spreading throughout the facility. We do have COVID-19 positive cases and are managing those effectively with the help of our medical personnel.

Screenings are occurring for any employee or provider entering the facility and we continue to advise any employee who does not feel well to stay home. We are still conducting extra cleaning throughout the facility. Utilizing sanitation sprays and additional Ultraviolet light equipment to supplement the cleaning. **We continue to ask for your assistance by making sure you are cleaning thoroughly within your housing areas.** Cleaning supplies are readily available. Please use them as often as possible. Also, please practice good hygiene. **Wash your hands regularly and don't touch your face.**

The extra steps we have put in place during our admission into jail are still ongoing. We are questioning and visibly monitoring any new arrest brought into the facility to try and determine if medical clearance is needed. Every new person being lodged is given a mask. This is in addition to every person in every cell being given a mask to use.

You are all aware of the restrictions within the facility as far as visitation, recreation, commissary and changes in the meals. Again, these steps have been put in place to protect you as well as us during these times. We are looking at ways to return these items back to normal as soon as **safely** possible. To try and offset some of these restrictions we have added one additional free visit and phone call and inmate workers get two free visits and one phone call thru IC Solutions.

It must be reiterated that other changes could still occur in the future based on circumstances as this situation is very fluid. Various areas have been quarantined and some of those quarantines are starting to be lifted if symptoms are not present in anyone housed in that location.

The Sheriff's Office is in constant communication with our health care provider as well as the Oakland County Health Department so that we keep current with the constantly changing situation. The Sheriff's Office and our partners want to assure you that we continue to take this situation very seriously and are taking as many precautions as we can to protect everyone.

Thank you. Please make sure you are washing your hands and wearing the mask you were given!

Captain Curtis D. Childs

EXHIBIT I



**Daily Inmate Population Report for
Friday 4/17/2020**



Summary

Main Jail	Capacity	Inmates
* 1G EAST	32	4
* HOLDING FOR RIDE-OUTS	0	0
* I-BLOCK HOLDING	15	6
* INTAKE	109	32
* PRE-BOOKING	0	0
* TEMP OVERFLOW HOLDING	0	0
Non-General Pop Subtotal	156	42
Main Jail	Capacity	Inmates
CLINIC	7	3
K-BLOCK	25	19
OCJL-ANNEX	440	202
OCJL-GENERAL POPULATION	638	377
General Population Subtotal	1,110	601
Satellites	Capacity	Inmates
EAST ANNEX	398	99
Satellites Subtotal	398	99
95% of General Population	1,433	700
Total of General Population	1,508	700
In Custody Total	1,664	742

Main Jail

Cell Block	Capacity	Inmates
A	110	59
B	110	66
C	110	82
D	110	72
EAST BLOCK	36	7
WEST BLOCK	36	18
I	66	41
N1	28	19
N2	32	13
General Population Main Jail Subtotal	638	377

Annex

Cell Block	Capacity	Inmates
1E WEST	16	14
1G WEST	32	16
H1	64	54
Female Subtotal	112	84
E2	48	29
F1	64	36
F2	64	34
G2	64	19
Male Subtotal	240	118
General Population Annex Subtotal	440	202

* NOTE: These inmates not included in the Total of General Population.

EXHIBIT J

Dunbar v. Rozen, Slip Copy (2019)

2019 WL 3213757

2019 WL 3213757

Only the Westlaw citation is currently available.

United States District Court, W.D.

Michigan, Southern Division.

Joseph Gregory DUNBAR, #129278, Plaintiff,

v.

Bradley ROZEN and Robert Woldhuis, Defendants.

No. 1:18-cv-617

Signed 07/17/2019

Attorneys and Law Firms

Joseph Gregory Dunbar # 129278, Coldwater, MI, pro se.

Elizabeth R. Husa Briggs, Dustin Ray Senneker, Kyla Lillian Ragatzki, Michigan Department of Attorney General, Lansing, MI, for Defendants.

ORDER ADOPTING REPORT AND RECOMMENDATION and MODIFYING REPORT AND RECOMMENDATION AS TO OBJECTION 7 (HABEAS CLAIM)

Paul L. Maloney, United States District Judge

*1 The magistrate judge issued a report recommending the Court deny three motions filed by Plaintiff Joseph Dunbar. (ECF No. 120.) Dunbar filed objections. (ECF No. 123.) For the reasons provided below, Dunbar's objections are overruled and the Court will adopt the report and recommendation.

I.

The standards for considering objections to a report and recommendation are well-settled. After being served with a report and recommendation (R&R) issued by a magistrate judge, a party has fourteen days to file written objections to the proposed findings and recommendations. 28 U.S.C. § 636(b)(1); Fed. R. Civ. P. 72(b)(2). A district court judge reviews de novo the portions of the R&R to which objections have been filed. 28 U.S.C. § 636(b)(1); Fed. R. Civ. P. 72(b)(3). Only those objections that are specific are entitled to a de novo review under the statute. *Mira v. Marshall*, 806 F.2d 636,

637 (6th Cir. 1986) (per curiam). "[A]n objection that does nothing more than state a disagreement with the magistrate's suggested resolution, or simply summarizes what has been presented before, is not an 'objection' as that term is used in the context of Federal Rule of Civil Procedure 72." *Brown v. City of Grand Rapids*; Michigan, No. 16-2433, 2017 WL 4712064, at *2 (6th Cir. June 16, 2017).

II.

Objection 1. Lack of Facts

Dunbar contends the report and recommendation lacks facts. This objection is overruled. Rule 72, not Rule 52, governs the report and recommendation. Neither rule specifies a particular format for a finding of fact or a proposed finding of fact. Neither rule requires each and every finding of fact or proposed finding of fact be specifically numbered. Through the discussion of each motion, the magistrate judge sets for the proposed findings of fact for each recommendation.

Objection 2. Date of Screening

Dunbar contends the magistrate judge erred when stating that the petition was screened on July 12, 2017. This objection is overruled. The magistrate judge correctly stated that a screening occurred on July 12, 2017. Dunbar is correct that a screening also occurred on May 6, 2015. Correction of any error does not alter any of the material facts or recommendations relevant to this R&R.

Objections 3 and 4

Neither of these objections address a material fact set forth in the R&R. These two objections merely recite some history of this lawsuit. At best, these objections identify issues resolved in other orders that are not part of the report and recommendation. These objections are overruled.

Objection 5. Lack of Proper Support for Summary Judgment Motions

Dunbar argues Defendants have failed to support their motions for summary judgment with properly sworn affidavits. This objection is overruled. This objection does not address any proposed finding of fact, conclusion of law, or recommendation in the report and recommendation. The magistrate judge does not address any motion filed by Defendants in this R&R.

Dunbar v. Rozen, Slip Copy (2019)

2019 WL 3213757

Objection 6. Jury Trial

Dunbar asserts his right to a jury trial. This objection is overruled. The objection does not address any proposed finding of fact or conclusion of law in the report and recommendation. Dunbar has not explained how his right to a jury trial is implicated by the recommended disposition of any of his motions resolved in this report and recommendation. Furthermore, the right to a jury trial does not preclude dismissal of claims through well-established pretrial procedures and motions.

Objection 7. § 2241 Habeas Petition

*2 In resolving Dunbar's motion for rehearing, the magistrate judge explained why no habeas claim was before the Court as part of this lawsuit. (R&R at 3 PageID.881.) Dunbar objects, referring to a footnote in the order transferring this lawsuit from the Eastern District to the Western District of Michigan. (ECF No. 85 Order of Transfer at 1 n.1 PageID.474).

Dunbar's objection is overruled. The magistrate judge correctly and accurately described the status of Dunbar's habeas claim.

In addition, the R&R is MODIFIED to supplement the R&R with the following discussion to clarify the status of any habeas claim in this lawsuit.

After remand from the Sixth Circuit, Judge Denise Hood conducted a primary screening of the complaint under 28 U.S.C. § 1915(e)(2). (ECF No. 47.) Judge Hood addressed the viability of Dunbar's challenge to the length of his state court sentence as a § 1983 claim. (Id. at 4-5 PageID.343-44.) The civil rights challenge to the length of his sentence was dismissed as barred by *Heck v. Humphrey*, 512 U.S. 477 (1994). (Id.) Finding no other viable claims against Defendant DeWayne Burton, the warden of the facility where Dunbar is incarcerated, Judge Hood dismissed the civil rights complaint against Defendant Burton. (Id. at 9 PageID.348.) Defendant Burton has never been served with the summons and complaint.

The United States Supreme Court has explained that "[f]ederal law opens two main avenues to relief on complaints related to imprisonment: a petition for habeas corpus, 28 U.S.C. § 2254, and a complaint under the Civil Rights Act of 1987, Rev. Stat. § 1979, as amended, 42 U.S.C. § 1983." *Muhammad v. Close*, 540 U.S. 749, 750 (2004) (per

curiam). Causes of action arising from the conditions and circumstances of confinement are brought through claims under § 1983 and are subject to various procedures and consequences set forth in the Prison Litigation Reform Act (PLRA). See *id.*; *Moran v. Sondalle*, 218 F.3d 647, 649 (7th Cir. 2000) (per curiam). Challenges to the validity and duration of a conviction are brought through habeas applications and are subject to different procedures and consequences set forth in the Antiterrorism and Effective Death Penalty Act (AEDPA). See *Muhammad*, 540 U.S. at 750; *Moran*, 218 F.3d at 649. Because the requirements for the two types of lawsuits are different, the Seventh Circuit explained that it was "important to classify [the] cases correctly." *Moran*, 218 F.3d at 649.

The Seventh Circuit also noted that prisoners "may be tempted to choose one route rather than another to avoid" the various procedures and consequences set forth in the two statutes. *Moran*, 218 F.3d at 649. A "hybrid" action involving both types of claims "presents significant problems and courts must be on guard for attempts to use § 1983" to avoid the restrictions contained in the AEDPA. *Spencer v. Barret*, No. 14-10823, 2015 WL 4528052, at *4 (E.D. Mich. July 27, 2015). Where prisoners have sought to bring a hybrid habeas and civil rights claims, courts have directed the prisoners to file separate actions. See, e.g., *Kirk v. Jablonski*, No. 18-cv-288, 2019 WL 1283009, at *1 (D.N.M. Mar. 20, 2019).

Since his lawsuit was filed, the courts have consistently treated Dunbar's lawsuit as a civil rights lawsuit brought under § 1983. In her initial review of the lawsuit, Judge Hood determined Dunbar filed a civil rights complaint under § 1983 and not an application for habeas relief. Dunbar did not seek reconsideration of that conclusion. Judge Hood dismissed Dunbar's civil rights challenge to the length of his sentence as barred by *Heck v. Humphrey*. Dunbar did not seek reconsideration of that conclusion. Judge Hood did not order the summons and complaint be served on Warden Burton, who would have been the only proper defendant for a habeas claim. Dunbar did not seek reconsideration of that conclusion. Magistrate Judge R. Steven Whalen granted Dunbar's application to proceed without prepayment of the filing fee and allowed the \$350 filing fee to be paid over time by withdrawals from his prison trust fund. (ECF No. 46.) That amount is the filing fee for a civil action, and not the filing fee for a habeas application, which is only five dollars. The one exception to treating the lawsuit as a civil rights claim rather than habeas claim is the footnote contained in the magistrate judge's order transferring the case from the Eastern District to

Dunbar v. Rozen, Slip Copy (2019)

2019 WL 3213757

the Western District. That comment is not binding and fails to note that all of the claims brought against Defendant Burton had been dismissed.

*3 As this case has been litigated, Dunbar has not presented a habeas application to challenge the duration of his sentence. He does not have a pending habeas claim.

Objection 8

This objection does not address any finding of fact or conclusion of law set forth in the R&R. Rather, Dunbar merely asserts that he has viable claims. This objection is overruled.

III.

Having reviewed the objections de novo, the Court **ADOPTS** the Report and Recommendation as the Opinion of this Court, with **MODIFICATIONS** to supplement the discussion of Objection 7.

Dunbar's motion for a rehearing (ECF No. 101) is **DENIED**; his motion for default judgment (ECF No. 103) is **DENIED**; and his motion for summary judgment (ECF No. 110) is **DENIED**.

IT IS SO ORDERED.

All Citations

Slip Copy, 2019 WL 3213757

End of Document

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EXHIBIT K



Circuit Court

County of Oakland

1200 N TELEGRAPH RD DEPT 404
PONTIAC, MICHIGAN 48341-0404

SHALINA KUMAR
CHIEF JUDGE

SIXTH JUDICIAL CIRCUIT
OF MICHIGAN
(248) 858-5280
FAX 248-975-9784
kumars@oakgov.com

Sixth judicial Circuit Court COVID-19 State of Emergency Procedures

This Order of the Sixth Judicial Circuit Court is issued in response to the COVID-19 (Coronavirus) outbreak and the resulting states of emergency declarations issued by President Donald J. Trump and Governor Gretchen Whitmer, and as authorized by Michigan Supreme Court Administrative Order No. 2020-1.

This Order is issued to implement emergency procedures to reduce the risk of transmission of COVID-19, and to protect the health and safety of the public and all who conduct business in the Circuit Court. This Order shall take immediate effect and continue for 30 calendar days or as otherwise stated in this Order, or until further notice by the court.

The Sixth Judicial Circuit Court will remain open to handle only essential operations as follows:

Criminal Cases

- Arraignments on the information will be done by mail for the next 30 days;
- Emergency bond motions;
- Arraignments on bench warrants and warrants for violations of probation;
- All criminal jury trials scheduled for the next 30 days will be adjourned. Criminal jury trials in progress as of March 16 will continue;
- Sentencing hearings for in-custody defendants will be held by video unless objected to by the defense, and in that case may be adjourned; and
- All criminal calls through March 31 will be adjourned.

Juvenile Cases

- Preliminary hearings for all delinquency and child protective proceedings;
- Issuance of and arraignments on all OTTICs;
- Violation of probation hearings when detention is requested;
- Emergency removal hearings for child protective proceedings;
- In-custody designated and adult court waiver arraignments;
- Safe delivery of newborn hearings;
- Reimbursement department bench warrant dismissal hearings;
- Parental by pass hearings;
- Disposition hearings for in-custody juveniles will be done by video; and
- All trials will be adjourned for 30 days.

Domestic Relations Cases

- Divorce, custody and parenting time matters alleging an immediate threat of harm to the children; and
- All family division motion calls will be adjourned through March 31. Emergency motions may be heard by telephone when possible.

Friend of the Court Matters

- Early intervention conferences shall be adjourned or handled telephonically, if possible;
- The SMILE Program shall be offered electronically only;
- The FOC payment window will remain open;
- FOC child support reviews will continue;
- Custody and parenting time investigations and parenting time disputes will be addressed using telephone interviews only;
- FOC arraignments on bench warrants will continue; and
- Referee hearings will be adjourned when possible or conducted by telephone when necessary.

Personal Protection Orders

- In-custody arraignments on bench warrants for violation of PPOs by video;
- Contested show cause hearings if defendant remains in custody after arraignment;
- Personal Protection Order petitions of an emergency nature alleging an immediate threat of harm;
- Hearings on a request for entry of a PPO on a case by case basis; and
- Bail hearings for PPO respondents will continue per current practice.

Civil Cases

- Requests for emergency show cause and injunctive orders will be reviewed by the assigned judge or the judge on call;
- Business Court emergencies will be reviewed by the assigned judge or the judge on call; and
- Civil jury and bench trials will be adjourned for 30 days or until further notice by the court.
- No in-person civil motion calls will be conducted through March 31. Motions may be filed and heard, via telephone, at the discretion of the court; and
- Case evaluation hearings scheduled to be heard in the next 30 days will be adjourned until further notice by the court.

The Chief Judge will hear all infectious disease petitions brought by the Oakland County Health Department or the Oakland County Department of Corporation Counsel on behalf of Oakland County.

Public viewing of court video records will be suspended for the next 30 days or until further notice by the court.

All proceedings of the Adult Treatment and Juvenile Drug Courts will be adjourned through April 1, or until further notice by the court.

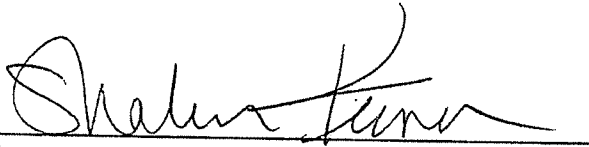
All matters not referenced above will be suspended or adjourned for 30 days, or as otherwise stated in this Order, until further notice by the Court.

All matters referenced above that will continue per current practice will be handled by video or audio conferencing, if practicable.

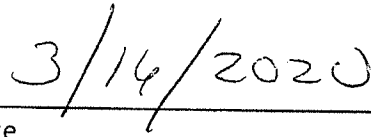
The assigned judge on any matter referenced above may deviate from the provisions of this Order for good cause and upon approval by the Chief Judge.

Questions about the status of specific cases must be directed to the assigned judge's chambers.

IT IS SO ORDERED



Shalina D. Kumar
Chief Circuit Judge



Date

EXHIBIT L

Order

Michigan Supreme Court
Lansing, Michigan

March 15, 2020

Bridget M. McCormack,
Chief Justice

ADM File No. 2020-08

David F. Viviano,
Chief Justice Pro Tem

Administrative Order No. 2020-1

Stephen J. Markman
Brian K. Zahra

In Re Emergency Procedures in
Court Facilities

Richard H. Bernstein
Elizabeth T. Clement
Megan K. Cavanagh,
Justices

Governor Whitmer having declared a state of emergency in response to the serious health risks posed by COVID-19, trial courts are authorized to implement emergency measures to reduce the risk of transmission of the virus and provide the greatest protection possible to those who work and have business in our courts. In support of this goal, on order of the Court, each trial court judge may implement emergency measures regarding court operations to enable continued service while also mitigating the risk of further transmission of the virus. Subject to constitutional and statutory limitations, such emergency measures may include:

1. Trial courts may adjourn any civil matters and any criminal matters where the defendant is not in custody; where a criminal defendant is in custody, trial courts should expand the use of videoconferencing when the defendant consents;
2. In civil cases, trial courts should maximize the use of technology to enable and/or require parties to participate remotely. Any fees currently charged to allow parties to participate remotely should be waived;
3. Trial courts may reduce the number of cases set to be heard at any given time to limit the number of people gathered in entranceways, lobbies, corridors, or courtrooms;
4. Trial courts should maximize the use of technology to facilitate electronic filing and service to reduce the need for in-person filing and service;
5. Trial courts should, wherever possible, waive strict adherence to any adjournment rules or policies and administrative and procedural time requirements;
6. Trial courts should coordinate with the local probation departments to allow for discretion in the monitoring of probationers' ability to comply with conditions without the need for amended orders of probation;

7. Trial courts should take any other reasonable measures to avoid exposing participants in court proceedings, court employees, and the general public to the COVID-19 virus;
8. In addition to giving consideration to other obligations imposed by law, trial courts are urged to take into careful consideration public health factors arising out of the present state of emergency: a) in making pretrial release decisions, including in determining any conditions of release, b) in determining any conditions of probation;
9. If a Chief Judge or the court's funding unit decides to close the court building to the public, the Chief Judge shall provide SCAO with the court's plan to continue to provide critical services, including handling emergency matters.

The emergency measures authorized in this order are effective until close of business Friday, April 3, 2020, or as provided by subsequent order.

During the state of emergency, trial courts should be mindful that taking reasonable steps to protect the public is more important than strict adherence to normal operating procedures or time guidelines standards. The Court encourages trial courts to cooperate as much as possible with the efforts of the Governor and other state and local officials to mitigate the spread of COVID-19, consistent with our duty to provide essential court services, protect public safety, and remain accessible to the public.

It is so ordered, by unanimous consent.



I, Larry S. Royster, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

March 15, 2020

Handwritten signature of Larry S. Royster in black ink.

Clerk

EXHIBIT M

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT

JAMAAL CAMERON; RICHARD
BRIGGS; RAJ LEE; MICHAEL
CAMERON; MATTHEW
SAUNDERS, individually and on
behalf of all others similarly situated,

Case 2:20-cv-10949-LVP-MJH

Plaintiffs,

v.

MICHAEL BOUCHARD, in his
official capacity as Sheriff of Oakland
County; CURTIS D. CHILDS, in his
official capacity as Commander of
Corrective Services; OAKLAND
COUNTY, MICHIGAN,

Defendants.

AFFIDAVIT OF SERGEANT RYAN TERRY

SERGEANT RYAN TERRY, being first duly sworn, deposes and states:

1. That this Affidavit is made of my own personal knowledge and that if I am sworn to testify, I can give competent testimony of my own personal knowledge in support of each paragraph of this Affidavit regarding conditions at the East Annex.

2. That I have been employed by the Oakland County Sheriff's Office since 2011. At all times relevant to the instant action I have worked as a Sergeant in the East Annex of the Oakland County Jail since August 2019.
3. The East Annex is a dormitory style correction facility which provides each inmate with freedom of movement around their assigned dorm. The Annex is divided into an East and West dormitory. All inmates in the West dormitory are trusties.
4. With regard to food preparation, on April 10, 2020, all food preparation was moved to the East Annex as a result of COVID-19 issues with the jail's food vendor, Aramark. In the East Annex, all trusties working in food preparation wear gloves and masks. All food preparation surfaces are disinfected after each meal.
5. No one is allowed to access the food prep room unless they are assigned to that detail.
6. With regard to soap, bar soap is available to all inmates upon request at the dorm officer's desk and is available at sinks within the East Annex for handwashing.
7. With regard to reclassification of inmates, inmates are not moved or reclassified under threat. Supervisors in the East Annex only move inmates as a result of rule violations, classification changes or health and safety issues.

No inmate was ever classified back to the main jail from the East Annex from “suspicion of exposure to COVID-19”.

8. With regard to inmate laundry which is performed in the East Annex, COVID-19 laundry is segregated from non-COVID-19 laundry. All trustees working in the laundry wear gloves. Masks are also available to all inmates in the East Annex. Inmates performing laundry services are allowed multiple clothing changes per day.
9. With regard to personal protective equipment for corrections staff, deputies always wear gloves when touching with inmates. All deputies have access to masks to be worn at their discretion.
10. With regard to disinfectant, all inmates in the West dorm of the East Annex have a key available to them to the supply room where the DMQ disinfectant is stored. They are responsible for cleaning their bunk areas and have access to DMQ at all times. With regard to the East dorm, disinfectant is available to inmates by request from the dorm deputy at all times.
11. With regard to medical call slips, medical call slips are readily available in the East Annex to any inmate who wants one.
12. With regard to assessing COVID-19, deputies take the temperature of every inmate twice per shift/six (6) times per day.

13. With regard to cleaning showers and bathrooms, they are cleaned daily by trustees using the DMQ disinfectant.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

Further, Affiant sayeth not.

Dated: April 19, 2020

/s/Sergeant Ryan Terry

SERGEANT RYAN TERRY

*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above Affidavit. I am an attorney admitted to the Eastern District of Michigan. On April 19, 2020, I personally spoke with SERGEANT RYAN TERRY and read this Affidavit to him. SERGEANT RYAN TERRY told me that the information in the above Affidavit is true, and gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/Steven M. Potter (P33344)

Steven M. Potter (P33344)

Attorney for Defendants