

EXHIBIT 2

Bosch Declaration

DECLARATION OF PAULETTE BOSCH

I, Paulette Bosch, declare as follows:

1. I was incarcerated in the Muskegon County Jail from November of 2012 until April of 2013. I have married since that time. When I was incarcerated, my name was Paulette Gauthier.
2. I had given birth via a Cesarean section to my son three months before my incarceration.
3. When I arrived at the jail, I was placed in the jail's holding tank and left there for approximately 7 days. The holding tank was a tiny cell, no bigger than a walk-in closet. It contained a toilet and a couple of benches. There was no shower and there were no beds.
4. There were as many as 18 other women in the holding tank with me at once. At times there was no room to sit, much less lie down.
5. Because the holding cell was so packed, it was almost impossible to sleep. At times when there were less inmates in the holding cell, women tried to sleep on the floor. But the floor was covered in urine, saliva, and other bodily fluids, and was also full of ants and other insects. Neither I nor other women in the holding tank given blankets or mats to sleep on.
6. The toilet in the holding tank is partially covered. Male guards can and did watch female inmates, including me, using the toilet.
7. During the entire time I was in the holding tank, I was not allowed to shower.
8. During my stay in the holding tank, I noticed that my Cesarean section wound had become infected. The wound remained infected for months. I was told by jail medical staff the infection was Methicillin-resistant Staphylococcus aureus (MRSA).
9. After spending about a week in the holding tank, I was moved into a cell with 11 other woman. The cell had one toilet and one shower in it.
10. That cell was infested with mice and insects. The shower in the cell was covered in dark mold and the toilet leaked and backed up regularly, spilling raw sewage, urine, and menstrual blood into our cell.
11. When I was moved out of the holding tank, MCJ staff confiscated my bra and underwear. I was not provided a replacement bra. I had to wait over a week until my family deposited money in my commissary account so I could purchase one.
12. During my incarceration I was required to wear a one-piece jumpsuit. I had to pull down the

jumpsuit in order to use the toilet, which meant that I was forced to expose my entire body, including my breasts.

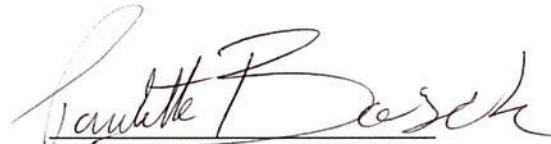
13. Male guards and male inmate trustees were able to see into my and other women's cells when they walked by. They had unobstructed views of my cellmates and I while we were mostly naked using the toilet and while we were undressing to take a shower.
14. I tried to put up a sheet to protect my privacy while using the toilet, but guards ripped the sheet down and reprimanded me for putting it up. Guards put us on lockdown or took away our blankets if we tried to protect our privacy.
15. The plumbing in the jail was constantly broken. Showers would spray extremely hot water that would burn inmates. The hot water caused an incredible amount of pain when it hit my infected C-section wound, and caused the wound to become even more irritated.
16. Because the water was burning hot, I and other women had to collect the hot water in makeshift containers and let it cool down before washing. One time when I was collecting the hot water in a tote bag, the tote bag ripped, spilling scalding hot water all over my body, including on my infected wound. I begged the guards to take me to the medical unit, but the guards refused.
17. Another time, the showers in my cell stopped working for three days in a row, and none of the women were able to bathe.
18. Jail staff forced me to clean and irrigate my infected wound myself. This involved holding open the infected wound, spraying it with what I believe was saline solution, and packing gauze into the wound. Because the cells were so filthy, I did not have any clean, much less sterile place where I could dress my wound.
19. The jail did not provide me enough medical supplies to regularly clean and treat my wound, nor did they follow my doctor's instructions. I would plead for more supplies and more treatment through verbal requests, as well as written kites and grievances, but the staff just kept telling me they did not have the resources and would not help me.
20. The infection was incredibly painful. I would often ask to see medical staff because of the pain, but guards ignored my requests. The wound did not heal properly and has caused serious medical complications and left me with a large scar.
21. During my six month incarceration, I was allowed to go to the gym in the jail twice. The gym was a large space on the first floor. The jail kept exercise equipment locked up in this

- space, but never allowed me or the women I was with to use the equipment.
22. I did not have any other opportunities to exercise. The only way I could move was to walk around my cell.
 23. When I left the jail, I was in terrible physical shape. I was unable to fully rehabilitate from giving birth because I was not allowed to exercise and my Cesarean wound was severely infected.
 24. Guards would constantly make demeaning comments to me and other women. They guards called me “the MRSA girl.” Guards would use racial slurs and refer to the female inmates as “you bitches.” They would also mock women who received food stamps.
 25. Staff did not give us adequate cleaning supplies. The women in the jail knew I had an infection, and I would try my best to clean and disinfect the shower after I used it, but the staff would either refuse to provide cleaning supplies or provide watered down cleaning solutions.
 26. When the guards brought food to the cells, they would take away our meals if we did not come retrieve the food immediately, leaving women without food for long stretches of time.
 27. The drinking fountains in the cells were often broken. This meant that women only received drinking water with their meals. Women would often beg for additional water, but they were ignored.
 28. Guards did not respond to request for menstrual pads. On one occasion, I continually asked for pads for several hours, but I was not provided with any. I bleed into my uniform. The guards refused to provide me with a change of clothes, so I had to wash my uniform the best I could in the sink, wear the wet, stained uniform, and then wait a week, until the next laundry day, for a new uniform.
 29. Guards also ignored my requests for toilet paper.
 30. Some women, including myself, were prescribed two mattresses by the medical staff. This was meant to help women with wounds, stiches, or pins in their bones. Guards either refused to provide us with extra mats, or confiscated them when they were angry with us. I never received the two mattresses I was prescribed.
 31. I wrote approximately 20 grievances about the terrible conditions inside the jail and the treatment of the female inmates. I did not receive responses to any of my grievances. I began mailing the grievances to the jail through the US Postal Service, in the hope that

somebody would actually read them.

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

Dated: 11-21-14


Paulette Bosch