

January 7, 2020

Eric S. Dreiband, Esq.
Assistant Attorney General
Civil Rights Division
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

**Re: Request for Immediate CRIPA Investigation into Conditions of Confinement
in the Mississippi Department of Corrections**

Dear Assistant Attorney General Dreiband:

We write on behalf of the thousands of Mississippians who are currently incarcerated in the custody of the Mississippi Department of Corrections (“MDOC”) and their family members, friends, and communities. The Mississippi prison system is in a state of acute and undeniable crisis, with five deaths in just the last ten days,¹ and a history of preventable deaths and injuries stretching back years. Mississippi has acknowledged the danger presented by severe understaffing and horrific conditions,² but has repeatedly failed to take appropriate action notwithstanding advocacy, litigation, and the pleas of those incarcerated and those who work in Mississippi’s prisons.

As indicated by its track record over the last several years and substantiated by the events of the last ten days, Mississippi is deliberately and systematically subjecting people in its care to a substantial risk of serious harm due to understaffing, in violation of the rights secured and protected by the Eighth Amendment to the United States Constitution, and it is no exaggeration to say more

¹ The deaths are:

- On December 29, 2019, Terrandance Dobbins was killed in a “major disturbance” at SMCI, in which several other individuals were injured.
- On January 1, 2020, Walker Gates was stabbed to death at Parchman during a “major disturbance” at that prison.
- On January 2, Roosevelt Holliman was stabbed to death at Parchman.
- On January 2, Gregory Emary was killed at the Chickasaw County Regional Correctional Facility.
- On January 3, Denorris Howell was killed at Parchman.

See Alissa Zhu, *Inmates Killed During Mississippi’s Prison Violence: Who are They?*, MISS. CLARION LEDGER (Jan. 3, 2020), <https://www.clarionledger.com/story/news/local/2020/01/03/parchman-riot-ms-prison-violence-who-are-inmates-killed/2803405001/>.

² See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs> (Commissioner Pelicia Hall stating she must use lockdowns to maintain order due to inadequate staffing, but that extended lockdowns “create an unsafe environment for my staff”).

lives will be lost absent immediate intervention. Accordingly, we write to request that, pursuant to its authority under the Civil Rights of Institutionalized Persons Act (“CRIPA”), 42 U.S.C. § 1997 *et seq.*, the United States Department of Justice, Civil Rights Division open an investigation into widespread, systemic, inarguably “egregious [and] flagrant” violations of the civil rights of the nearly 20,000 men and women incarcerated by the state of Mississippi.³ This request follows others made by Families Against Mandatory Minimums (FAMM), first made on May 24, 2019, and renewed on November 14, 2019;⁴ and by Representative Bennie Thompson on Monday, January 5, 2020.⁵

I. MDOC BACKGROUND

As of November 2019, the MDOC incarcerates 19,091 people⁶ in three state-run correctional facilities;⁷ three privately-run correctional facilities⁸ operated by the Management and Training Corporation; 15 regional jails; and several community work centers and restitution centers. Notwithstanding sentencing reforms enacted in 2014 that resulted in a modest population reduction, Mississippi has the third highest incarceration rate⁹ of any U.S. state, with approximately 640 people living behind bars per 100,000 residents.¹⁰ In the last five years, Mississippi’s spending on its correctional system has fallen dramatically. Since 2014, spending on MDOC has declined \$ 185 million.¹¹ The state has functionally divested from its correctional system, with deadly consequences for the individuals who live and work within that system.

³ CRIPA, 42 U.S.C. § 1997a(a).

⁴ Letters from Kevin Ring, President, Families Against Mandatory Minimums, to Assistant Attorney General Eric Dreiband (Nov. 14, 2019 and May 24, 2019), available online at <https://famm.org/wp-content/uploads/Parchman-follow-up-letter-Nov-19.pdf>.

⁵ See Cianna Reeves, *Congressman Bennie Thompson Requesting AG Investigation on Prisons*, WJTV (Jan. 5, 2020), <https://www.wjtv.com/news/congressman-bennie-thompson-requesting-ag-investigation-on-prisons/>.

⁶ MISS. DEP’T OF CORRS., *Fact Sheet* (Nov. 1, 2019), <https://www.mdoc.ms.gov/Admin-Finance/MonthlyFacts/2019-11%20Fact%20Sheet.pdf>.

⁷ The three state-run facilities are: Mississippi State Penitentiary (MSP), also known as “Parchman Farm,” in Parchman, MS; South Mississippi Correctional Institution (SMCI), in Leakesville, MS; and Central Mississippi Correctional Facility (CMCF) in Pearl, MS.

⁸ The three privately operated facilities are: East Mississippi Correctional Facility (EMCF), in Meridian, MS; Marshall County Correctional Facility (MCCF), in Holly Springs, MS; and Wilkinson County Correctional Facility (WCCF) in Woodville, MS.

⁹ See SENTENCING PROJECT, *State-by-State Data: State Imprisonment Rate*, <https://www.sentencingproject.org/the-facts/#rankings> (2017).

¹⁰ Based on Mississippi’s 2018 estimated population of 2,986,530. See U.S. CENSUS BUREAU, *State Population Totals and Components of Change: 2010–2019*, <https://www.census.gov/data/tables/time-series/demo/popest/2010s-state-total.html> (last revised Dec. 30, 2019).

¹¹ Jerry Mitchell, *We Reported on Troubled Prisons. Now, Officials and a Gang Have a Shared Goal: Reform*, PROPUBLICA (Sept. 6, 2019), <https://www.propublica.org/article/we-reported-on-troubled-prisons-now-officials-and-a-gang-have-a-shared-goal-reform>.

Indeed, deaths in MDOC custody, which were already higher than the rest of the country, have been rising at an alarming rate. Between 2001 and 2014, about 51 individuals in MDOC custody died per year, an average of about four deaths per month.¹² The state's annual prison death rate during that period was 324 per 100,000 prisoners, higher than the national rate of 255 over the same period.¹³ Since then, deaths have escalated sharply—from 62 in fiscal year 2014 to 85 in fiscal year 2018 and 80 in fiscal year 2019.¹⁴ It is impossible to obtain a precise number of deaths resulting from preventable harm because MDOC has failed to conduct or complete investigations into these deaths, notwithstanding family pleas, pressure from advocacy organizations, and a 2018 request from MDOC Commissioner Pelicia Hall for the Federal Bureau of Investigations to assist the Mississippi Department of Public Safety.¹⁵

The level of violence that pervades Mississippi's prison system is directly linked to the acute understaffing of its prisons. This fact is virtually undisputed, including by Commissioner Hall.¹⁶ In January 2019, MDOC issued an extraordinary press release in which MDOC Commissioner Hall stated that near-capacity prison populations and extreme staff vacancy rates had created a "staffing crisis," which threatened a "pressure cooker type situation" in MDOC's three state-run prisons.¹⁷ At South Mississippi Correctional Institution ("SMCI"), the staff vacancy rate was 48 percent,¹⁸ causing the facility to be on lockdown almost continuously since approximately January

¹² Jon Schuppe & Tereza Frenzel, *Sixteen Prisoners Died in Mississippi Prisons in One Month. Their Families Want to Know Why*, NBC NEWS (Sept. 18, 2018), <https://www.nbcnews.com/news/us-news/15-prisoners-died-one-month-mississippi-their-families-want-know-n905611> (citing Margaret E. Noonan, *Mortality in State Prisons: 2001-2014 Statistical Tables*, BUREAU OF JUSTICE STATISTICS 10 tbl. 11 (Dec. 2016), <https://www.bjs.gov/content/pub/pdf/msp0114st.pdf>).

¹³ Jon Schuppe & Tereza Frenzel, *Sixteen Prisoners Died in Mississippi Prisons in One Month. Their Families Want to Know Why*, NBC NEWS (Sept. 18, 2018), <https://www.nbcnews.com/news/us-news/15-prisoners-died-one-month-mississippi-their-families-want-know-n905611> (citing Margaret E. Noonan, *Mortality in State Prisons: 2001-2014 Statistical Tables*, BUREAU OF JUSTICE STATISTICS 10 tbl. 11 (Dec. 2016), <https://www.bjs.gov/content/pub/pdf/msp0114st.pdf>).

¹⁴ Lauren Gill, *'It's Just Heartbreaking': Families Search for Answers as Death Rate Rises in Mississippi Prisons*, THE APPEAL (Dec. 9, 2019), <https://theappeal.org/its-just-heartbreaking-families-search-for-answers-as-death-rate-rises-in-mississippi-prisons/>.

¹⁵ Michelle Liu, *Cause of Death: Undetermined*, MISS. TODAY (Dec. 4, 2019), <https://mississippitoday.org/2019/12/04/capstone-prison-deaths/> (discussing lack of information regarding the sixteen deaths that occurred in Mississippi's prison system in August 2018).

¹⁶ See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

¹⁷ MISS. DEP'T OF CORR., *SMCI Staffing Crisis Prompts Lockdown and Visitation Cancellation*, January 25, 2019, <https://www.mdoc.ms.gov/Pages/SMCI-Staffing-Crisis-Prompts-Lockdown-and-Visitation-Cancellation.aspx>.

¹⁸ MISS. DEP'T OF CORR., *SMCI Staffing Crisis Prompts Lockdown and Visitation Cancellation*, January 25, 2019, <https://www.mdoc.ms.gov/Pages/SMCI-Staffing-Crisis-Prompts-Lockdown-and-Visitation-Cancellation.aspx>.

2019.¹⁹ At Central Mississippi Correctional Facility (“CMCF”), it was 46 percent.²⁰ At the Mississippi State Penitentiary at Parchman (“Parchman”), it was 42 percent.²¹ Together, more than 670 security staff positions went unfilled across the three facilities.²² The situation has remained dire over the course of 2019. As of the end of October 31, 2019, state personnel board figures for correctional officer positions showed that SMCI had only 119 of 224 budgeted positions filled; CMCF had 213 out of 445 filled; and Parchman had 261 out of 512 filled.²³ As a result, from July 2017 to July 2019, the number of corrections officers in the three major state facilities fell from 905 to 627, without *any* corresponding reduction in prisoner population.²⁴ These prisons are operating with little over half the staff minimally required to operate them safely.

Mississippi currently pays the lowest salaries for correctional staff of any state in the country,²⁵ with correctional officers receiving an entry level salary of \$24,900.²⁶ A family of four living on this salary would fall below the federal poverty line.²⁷ By failing to staff its prisons adequately to protect people in its care from violence, Mississippi is also exposing its employees to unacceptable levels of workplace danger. Staff are routinely required to work long stretches of overtime to cover for vacancies, causing potentially unsafe conditions due to staff exhaustion.²⁸

¹⁹ Jerry Mitchell, *Ticking Time Bomb: Violence Surges Among Guard Shortage, Lockdown at Mississippi Prison*, USA TODAY (Aug. 19, 2019), <https://www.usatoday.com/story/news/investigations/2019/08/19/prison-violence-surges-mississippi-prison-amid-guard-shortage/2054554001/>.

²⁰ MISS. DEP’T OF CORR., *SMCI Staffing Crisis Prompts Lockdown and Visitation Cancellation*, January 25, 2019, <https://www.mdoc.ms.gov/Pages/SMCI-Staffing-Crisis-Prompts-Lockdown-and-Visitation-Cancellation.aspx>.

²¹ MISS. DEP’T OF CORR., *SMCI Staffing Crisis Prompts Lockdown and Visitation Cancellation*, January 25, 2019, <https://www.mdoc.ms.gov/Pages/SMCI-Staffing-Crisis-Prompts-Lockdown-and-Visitation-Cancellation.aspx>.

²² *MS Prisons ‘A Pressure Cooker,’ MDOC Commissioner Warns. Staff Shortage Leads to Lockdown.*, CLARION LEDGER (Jan. 27, 2019), <https://www.clarionledger.com/story/news/2019/01/27/ms-prison-lockdown-mdoc-cites-staff-shortage-more-lockdowns-possible/2694591002/>.

²³ Miss. State Personnel Board, MDOC Personnel Statistics (Oct. 31, 2019).

²⁴ See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

²⁵ Kendall Downing, *Low Pay Contributes to Staffing Problems at Mississippi Prisons*, WLOX (Aug. 22, 2019), <https://www.wlox.com/2019/08/23/low-pay-contributes-staffing-problems-mississippi-prisons/>; see, e.g., U.S.

Bureau of Labor Statistics, *Occupational Employment and Wages* (May 2018), <https://www.bls.gov/oes/current/oes333012.htm>. This data contains wage information for all “correctional officers and jailers” regardless of employer, and thus also includes, for instance, people employed by county jails. Nonetheless, it points to the stark lack of investment in corrections personnel in Mississippi. The states with the lowest mean hourly wages are all in the Deep South: Louisiana at \$16.53, Arkansas at \$16.40, Tennessee at \$17.05, Alabama at \$17.67, and Georgia at \$16.49. Mississippi trails all of its neighbors by a substantial margin, with an average hourly wage of just \$14.83.

²⁶ See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

²⁷ See Annual Update of the HHS Poverty Guidelines, 84 Fed. Reg. 1167–68 (Feb. 1, 2019).

²⁸ Reported to MacArthur Justice Center.

Commissioner Hall has called these vacancies “alarming,”²⁹ and by any objective measure, they are. In April 2019, the Civil Rights Division issued a report in which it cited the Alabama Department of Corrections (“ADOC”) for “egregious” and “dangerous” systemwide understaffing that contributed to likely violations of the Eighth Amendment rights of Alabama prisoners.³⁰ ADOC maintains a staffing ratio of 9.9 prisoners per correctional officer.³¹ At the end of October 2019, each MDOC state-run facility had ratios worse than Alabama’s: 12.5 prisoners per correctional officer at Parchman; 17.1 prisoners per correctional officer at CMCF; and an incredible 22.3 prisoners per correctional officer at SMCI,³² which former MDOC Commissioner Robert L. Johnson called “unconscionable” and unsafe.³³

The staffing situation is somewhat less transparent but equally troubling at Mississippi’s three privately run state facilities, Wilkinson County Correctional Facility (“Wilkinson”), Marshall County Correctional Facility (“Marshall”), and East Mississippi Correctional Facility (“EMCF”). All three facilities are operated under contract by Management and Training Corporation (“MTC”). At Wilkinson and Marshall, following recent wage increases,³⁴ guard compensation starts at \$11.25 per hour.³⁵ A leaked December 2018 MTC audit of Wilkinson revealed that more than a third of staff positions were vacant, and the prison was “severely burdened” due to 89 percent annual staff turnover.³⁶ At EMCF, according to 2017 deposition testimony, a captain with more than ten years’ experience was paid \$36,000 per year, with no overtime eligibility,³⁷ entry level correctional officers were paid approximately \$9.50 per hour—around \$20,000 per year³⁸—

²⁹ Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

³⁰ U.S. DEP’T OF JUSTICE, *Investigation of Alabama’s State Prisons for Men* 9–10 (Apr. 2, 2019), <https://www.justice.gov/crt/case-document/file/1149971/download>.

³¹ Jerry Mitchell, *Violent, Ongoing Hell: Mississippi Prisons May Be Worse than Alabama’s. Will DOJ Step in?*, CLARION LEDGER (Aug. 21, 2019), <https://www.clarionledger.com/story/news/2019/08/21/mississippi-prisons-conditions-worse-than-alabama-doj-violence-cruel-unusual-punishment/2055478001/>.

³² See MISS. DEP’T OF CORRS., *Daily Inmate Population – October 2019* (Nov. 8, 2019), <https://www.mdoc.ms.gov/Admin-Finance/Documents/2018%20Annual%20Report.pdf>.

³³ See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

³⁴ Joseph Neff & Alysia Santo, *What Happened When No One Wanted Dangerous, Low-Paying Guard Jobs? Wilkinson County Prison Put Gangs In Charge*, MISS. TODAY (Jun. 26, 2019), <https://mississippitoday.org/2019/06/26/what-happened-when-no-one-wanted-dangerous-low-paying-guard-jobs-wilkinson-county-prison-put-gangs-in-charge/>.

³⁵ See Kendall Downing, *Low Pay Contributes to Staffing Problems at Mississippi Prisons*, WLOX (Aug. 22, 2019), <https://www.wlox.com/2019/08/23/low-pay-contributes-staffing-problems-mississippi-prisons/>.

³⁶ Joseph Neff & Alysia Santo, *Corporate Confession: Gangs Ran This Private Prison*, THE MARSHALL PROJECT (Jun. 26, 2019), <https://www.themarshallproject.org/2019/06/26/corporate-confession-gangs-ran-this-private-prison>.

³⁷ Deposition of Christopher Dykes 12:7-13, 14, 51:11-22, *Dockery v. Hall*, No. 3:13-cv-326 (S.D. Miss. Mar. 21, 2017) (on file with Southern Poverty Law Center).

³⁸ Deposition of Christopher Dykes 52:4-11, *Dockery v. Hall*, No. 3:13-cv-326 (S.D. Miss. Mar. 21, 2017) (on file with Southern Poverty Law Center); see also Kendall Downing, *Low Pay Contributes to Staffing Problems at*

and an officer with seven years' experience still made only \$10.90 per hour.³⁹ Eldon Vail, the former commissioner of the Washington Department of Corrections, analyzed EMCF's staffing patterns and testified that the facility was systematically and dangerously understaffed.⁴⁰ Reportedly, at Marshall, shifts that require between 19 and 27 officers are routinely staffed by only five or six, sometimes leading to a single correctional officer overseeing an entire unit of more than 200 prisoners.⁴¹ In short, both public and privately-run prisons are dangerously understaffed due to Mississippi's refusal to pay staff an adequate wage.

State lawmakers have preliminarily rejected plans to address the well-publicized staffing crisis. For the upcoming 2021 fiscal year, MDOC requested budget increases that would allow it to raise salaries and fill additional positions.⁴² Instead, on December 11, 2019, the Mississippi Joint Legislative Budget Committee released budget recommendations that would see overall budget *reductions* of between 2.9 and 6.6 percent for each of the three state-run prisons from fiscal year 2020 to fiscal year 2021.⁴³

II. FACTUAL⁴⁴ AND LEGAL ALLEGATIONS

A. Failure to Protect From Harm Resulting in Widespread Deaths and Serious Injury

MDOC has the constitutional obligation to protect the individuals in its custody from harm at the hands of officers or other incarcerated individuals. Rampant overincarceration and acute understaffing at MDOC is so severe that it is functionally impossible for facility personnel to adequately manage the institutions and individuals charged to their care, resulting in brutal, foreseeable, and preventable deaths and injuries as the incarcerated individuals are left to

Mississippi Prisons, WLOX (Aug. 22, 2019), <https://www.wlox.com/2019/08/23/low-pay-contributes-staffing-problems-mississippi-prisons/>.

³⁹ Deposition of Shawanda Wallace 13:7-8, 200:9-11, *Dockery v. Hall*, No. 3:13-cv-326 (S.D. Miss. Mar. 9, 2017) (on file with Southern Poverty Law Center).

⁴⁰ See, e.g., Expert Report of Eldon Vail 5–11, *Dockery v. Hall*, No. 3:13-cv-326, ECF No. 801-1 (S.D. Miss. Nov. 16, 2018).

⁴¹ Reported to MacArthur Justice Center.

⁴² See MISS. DEP'T OF CORRS., *CMCF Budget Request for Fiscal Year Ending June 30, 2021* (Jul. 31, 2019), <http://www.lbo.ms.gov/PublicReports/AllReportsForAgency?FiscalYear=2021&AgencyFileNumber=558-00> (requesting \$18.529 million increase for salaries, wages, and fringe benefits); MISS. DEP'T OF CORRS., *Parchman Budget Request for Fiscal Year Ending June 30, 2021* (Jul. 31, 2019), <http://www.lbo.ms.gov/PublicReports/AllReportsForAgency?FiscalYear=2021&AgencyFileNumber=559-00> (requesting \$14.72 million increase for salaries, wages, and fringe benefits); MISS. DEP'T OF CORRS., *SMCI Budget Request for Fiscal Year Ending June 30, 2021* (Jul. 31, 2019), <http://www.lbo.ms.gov/PublicReports/AllReportsForAgency?FiscalYear=2021&AgencyFileNumber=560-00> (requesting \$11.765 million increase for salaries, wages, and fringe benefits).

⁴³ See MISS. JOINT. LEGIS. BUDGET COMM., *Fiscal Year 2021 Legislative Budget Committee Recommendations* 24–25 (Dec. 11, 2019), http://www.lbo.ms.gov/pdfs/fy21_jlbc_rec.pdf.

⁴⁴ We have learned of many incidents referenced in this letter directly from affected individuals. This information is presented without identifying information in order to preserve the anonymity and confidentiality of those individuals.

themselves to fight for control of the facilities. Five deaths have occurred in just the last 10 days. Mississippi officials placed the entire prison system on lockdown after the first killing, which ostensibly raised security to the highest level and is intended to prevent any further violence, yet four more people were killed shortly thereafter.

Three of these deaths (and two escapes)⁴⁵ have occurred at **Mississippi State Penitentiary (Parchman)** just since January 1, 2020. Parchman is the state's second- largest prison, with a capacity of 3,560 and a population of 3,252 men as of December 2019.⁴⁶ The recent killings include:

- On January 1, Walker Gates, 25, was stabbed to death at Parchman during a “major disturbance” at that prison.
- On January 2, 2020, Roosevelt Holliman, 32, was stabbed to death at Parchman.
- On January 3, Denorris Howell, 36, died of neck-related injuries following a fight at Parchman.⁴⁷

And on January 4, two individuals escaped from Parchman, demonstrating that the facility is not under control notwithstanding the involvement of multiple local law enforcement entities.⁴⁸

MDOC has failed to provide any accountability or transparency to date, with more information coming from the Sunflower County (Parchman) coroner than the entity charged with running Mississippi's prison system. Coroner Heather Burton, who has held her position for 12 years, has stated that three killings in three days at Parchman is “unprecedented,” adding that “[t]hings are kind of surreal at this point Every time the phone rings at this point, it's another one.”⁴⁹ Indeed, the public statements made by Mississippi officials make it clear they are trying to shift blame for the violence resulting from the failure of leadership and management to adequately staff

⁴⁵ See *Two Prisoners Escape Mississippi Prison After Weeks of Violence*, WMC NEWS (Jan. 4, 2020), <https://www.wmctionnews5.com/2020/01/04/two-inmates-escape-mississippi-prison-after-week-violence/>.

⁴⁶ MISS. DEP'T OF CORRS., Daily Inmate Population (Dec. 2019), <https://www.mdoc.ms.gov/Admin-Finance/DailyInmatePopulation/2019-12%20Daily%20Inmate%20Population.pdf>.

⁴⁷ Alissa Zhu, *Inmates Killed During Mississippi's Prison Violence: Who are They?*, MISS. CLARION LEDGER (Jan. 3, 2020), <https://www.clarionledger.com/story/news/local/2020/01/03/parchman-riot-ms-prison-violence-who-are-inmates-killed/2803405001/>.

⁴⁸ See Audrey McNamara, *Two Inmates Escape from Mississippi Prison Amid Week of Deadly Violence*, CBS NEWS (Jan. 4, 2020), <https://www.cbsnews.com/news/mississippi-prison-escape-two-inmates-escape-from-parchman-prison-amid-week-of-deadly-violence-2020-01-04/>.

⁴⁹ Luke Ramseth, Alissa Zhu & Lici Beveridge, *'Gangs are at War': Fifth Mississippi Prison Death Reported as Violence Continues*, USA TODAY (Jan. 4, 2020), <https://www.usatoday.com/story/news/nation/2020/01/03/parchman-riot-fifth-inmate-killed-amid-mississippi-prison-violence/2809758001/>.

the facility to the victims and incarcerated men and women rather than acknowledge that such violence is the predictable and preventable result of rampant overincarceration and understaffing.⁵⁰

The killings are occurring in an atmosphere of chaos and confusion due to MDOC's failure to communicate basic information to families with loved ones incarcerated at Parchman and other facilities where violence has erupted. Multiple fires have been reported at Parchman, with smoke reportedly making it difficult to see and breathe. Numerous outside law enforcement agencies have been called in, and the public liaison officer for one of them, the Tutwiler Fire Department, reported that "it's a mess over there."⁵¹ Family members are reaching out to advocates and the press to express fear for the health and safety of their loved ones. Burton reported that so many individuals have been injured that Parchman's on-site 128-bed medical unit is cannot handle them all.⁵² One mother reported that other prisoners told her that her son was stabbed in the eye during one of the uprisings but MDOC has not responded to her requests for information; she fears he is in danger of losing it.⁵³ An individual with a family member inside Parchman reported that as many as ten to twelve additional individuals may have been killed.⁵⁴ Images purporting to show the bodies of individuals injured or killed have circulated on the internet.⁵⁵ *Mississippi Clarion Ledger* reported that it has repeatedly asked MDOC for information about the injured but has received no response.⁵⁶

Since the violence began, MDOC officials have reportedly re-opened Parchman's Unit 32, a decrepit facility that has been shuttered since 2010 as result of litigation challenging horrific

⁵⁰ See, e.g., Jacob Gallant, *MDOC: Gangs Contributed to Deaths, Violence Inside Prisons*, WLBT (Jan. 3, 2020), <https://www.wlbt.com/2020/01/03/mdoc-gangs-contributed-violence-deaths-inside-prisons/> (quoting Governor-Elect Tate Reeves' statement regarding criminal prosecution of alleged perpetrators, "Grateful to those working to restore order and safety. That is the first priority. Then we need answers and justice on the people who perpetrated this violence. Any loss of life is tragic and must be addressed."). See also Scott Simmon, 'Order Has Been Restored' at Parchman, Governor Says, WAPT, Jan. 6, 2020, <https://www.wapt.com/article/order-has-been-restored-at-mississippi-prison-governor-says/30415804> (quoting Governor Phil Bryant as stating "'Someone asked earlier, 'Who's responsible for what's happening at Parchman?' The inmates -- the inmates are the ones that take each other's lives. Inmates are the ones that fashion weapons out of metal. The inmates are the ones that do the damage to the very rooms that they are living in. I would say, look to the inmates.'").

⁵¹ Clay McFerrin, *Parchman Situation Said to Be 'Under Control'*, THE SUN-SENTINEL (Jan. 2, 2020), <https://www.tallahatchienews.ms/front-page/slideshow-news/parchman-situation-said-be-under-control#sthash.q2wk6IIA.dpbs>.

⁵² China Lee, *One Inmate Killed, Others Injured During Riot at Parchman*, WLOX (Jan. 2, 2020), <https://www.wlox.com/2020/01/02/fire-reported-state-prison-parchman/>.

⁵³ Luke Ramseth, Alissa Zhu & Lici Beveridge, 'Gangs are at War': Fifth Mississippi Prison Death Reported as Violence Continues, USA TODAY (Jan. 4, 2020), <https://www.usatoday.com/story/news/nation/2020/01/03/parchman-riot-fifth-inmate-killed-amid-mississippi-prison-violence/2809758001/>.

⁵⁴ SPLC Telephone Call, January 4, 2020.

⁵⁵ Nathan Dimoff, *Prison Riots Started By Corrections Officers in Gangs, Inmates Claim*, PINAC NEWS (Jan. 4, 2020), <https://newsmaven.io/pinacnews/eye-on-government/mississippi-prison-riots-started-by-corrections-officers-in-gangs-inmates-claim-jP7sQ6TaDEG4c9Pqw6FSdw>.

⁵⁶ Luke Ramseth, Alissa Zhu & Lici Beveridge, 'Gangs are at War': Fifth Mississippi Prison Death Reported as Violence Continues, USA TODAY (Jan. 4, 2020), <https://www.usatoday.com/story/news/nation/2020/01/03/parchman-riot-fifth-inmate-killed-amid-mississippi-prison-violence/2809758001/>.

conditions of confinement and mistreatment of incarcerated individuals.⁵⁷ SPLC has reviewed a video purportedly taken inside Unit 32 since it was reopened that show men walking through standing water in hallways with paint peeling off the walls, covered in black mold, and water faucets and showers that do not turn on.⁵⁸ We have received reports that there is no running water or electricity at Unit 32. According to data collected from MDOC's inmate locator, at least 100 men have been housed at Unit 32 since MDOC began transferring men there on January 2, 2020, and SPLC has received information that suggests this number is underinclusive and may be as high as 500 men.⁵⁹ None of the individuals on Units 29 or 32 have been able to call out since the lockdown began, so their families have no idea whether they are safe or among the 128 injured individuals hospitalized at Parchman, or injured and hospitalized offsite.

The violence occurring at Parchman is not limited to last week's events.

- The coroner reported that she was aware of at least four similar uprisings that occurred during 2019.⁶⁰
- A parent reported that her child has been in Parchman's medical unit since mid-December 2019. She has repeatedly called the prison for more information and was unable to get a response. After several days, an incarcerated person told her that her son's throat had been slit. She is still doesn't know the status of her son.⁶¹
- Two deaths occurred the same night less than two months ago, on November 19, 2019; Michael Anderson, who was 26 years old, and Larry Walker, who was 28. MDOC has refused to release the causes of death pending autopsies and investigations.⁶²
- At least one of six individuals who died at Parchman in July 2019 was the victim of a homicide.⁶³

⁵⁷ Nathan Dimoff, *Prison Riots Started By Corrections Officers in Gangs, Inmates Claim*, PINAC NEWS (Jan. 4, 2020), <https://newsmaven.io/pinacnews/eye-on-government/mississippi-prison-riots-started-by-corrections-officers-in-gangs-inmates-claim-jP7sQ6TaDEG4c9Pqw6FSdw>; see Order of Dismissal Without Prejudice By Agreement of the Parties, *Presley v. Epps*, 4:05-cv-00148-JAD (N.D. Miss. Aug. 2, 2010), <https://www.clearinghouse.net/chDocs/public/PC-MS-0005-0012.pdf>.

⁵⁸ See, e.g., *Video: Purportedly Shows Parchman Inmates Being Housed in Condemned Unit 32 & Forced to Sleep on Floors*, BLACK WITH NO CHASER (Jan. 5, 2020), <https://blackwithnochaser.com/video-purportedly-shows-parchman-inmates-being-housed-in-condemned-unit-32-forced-to-sleep-on-floors/>.

⁵⁹ Data on file with SPLC.

⁶⁰ Bryan Davis Publisher, *One Confirmed Dead in Second Parchman Riot in as Many Days*, ENTERPRISE-TOCSIN (Jan. 2, 2020), <https://www.enterprise-tocsin.com/front-page-slideshow-news/one-confirmed-dead-second-parchman-riot-many-days#sthash.GlStqmixdpbs>.

⁶¹ Telephone call with SPLC.

⁶² Bryan Davis Publisher, *One Confirmed Dead in Second Parchman Riot in as Many Days*, ENTERPRISE-TOCSIN (Jan. 2, 2020), <https://www.enterprise-tocsin.com/front-page-slideshow-news/one-confirmed-dead-second-parchman-riot-many-days#sthash.GlStqmixdpbs>.

⁶³ Michelle Liu, *Coroner: Six Parchman Inmates Dead This Month, Including Two Who Served Time on Death Row*, MISS. TODAY (Jul. 16, 2019), <https://mississippitoday.org/2019/07/16/coroner-six-parchman-in-mates-dead-this-month-including-two-who-served-time-on-death-row/>.

The violence due to rampant overincarceration and understaffing is also not limited to particular facilities but is occurring throughout the system. In the absence of staffing adequate to maintain control and perform basic correctional functions, gangs effectively run prisons throughout the Mississippi prison system. **Wilkinson County Correctional Facility** (Wilkinson) is located in Woodville, Mississippi and has a capacity of 1000 with a population of 941 men as of December, 2019.⁶⁴ It is one of Mississippi's three privately run prisons, all of which are operated by a private company based in Utah, Management and Training Corporation (MTC). A December 2018 internal audit of MTC obtained by the Marshall Project revealed that prison officials openly acknowledged that gangs were in control of the facility:

The prevalence of not only STG⁶⁵ activity, but staff's tolerance of it, cannot be understated. Gang graffiti is evident throughout the facility. STG leaders are surrounded by "their" security at all times; outside their cell door, while they are showering and anywhere they go.⁶⁶

Overincarceration and understaffing result in the inability to keep people safe, and individuals at Wilkinson are subjected to extreme violence. Recent examples include:

- In December of 2019, an incarcerated man and correctional officer were injured in a stabbing incident.⁶⁷
- In November 2018, a prisoner assaulted staff, stole an officer's keys, and proceeded to free five other people from their cells. Together, the six men barricaded the housing pod from the inside, removed another person from his cell, and stabbed him repeatedly. Staff were unable to get inside for more than half an hour. Auditors noted this incident was caused in part by staffing shortages.⁶⁸
- On August 20, 2018, Nija Syvallus Bonhomme, 24, was killed after a fight.⁶⁹ Family members and their lawyer confirmed it was a gang killing.⁷⁰

⁶⁴ MISS. DEP'T OF CORRS., Daily Inmate Population (Dec. 2019), <https://www.mdcc.ms.gov/Admin-Finance/DailyInmatePopulation/2019-12%20Daily%20Inmate%20Population.pdf>.

⁶⁵ "STG" stands for "Security Threat Group," a correctional term for prison gangs. See generally *Gangs (Security Threat Groups)*, NAT'L INST. OF CORRS., <https://nicic.gov/gangs-security-threat-groups> (last visited Jan. , 2020).

⁶⁶ Joseph Neff & Alysia Santo, *Corporate Confession: Gangs Ran This Private Prison*, THE MARSHALL PROJECT (Jun. 26, 2019), <https://www.themarshallproject.org/2019/06/26/corporate-confession-gangs-ran-this-private-prison> (citing MANAGEMENT & TRAINING CORP., *Wilkinson County Correctional Facility Comprehensive Audit 6* (Dec. 20, 2018)).

⁶⁷ Sarah Fowler, *Wilkinson Correctional Facility Guard Stabbed. He was Transporting an Inmate*, MISSISSIPPI CLARION LEDGER, Dec. 10, 2019, <https://www.clarionledger.com/story/news/local/2019/12/10/prison-guard-stabbed-inmate-wilkinson-county-correctional-facility-ms/2634227001/>.

⁶⁸ MANAGEMENT & TRAINING CORP., *Wilkinson County Correctional Facility Comprehensive Audit 5* (Dec. 20, 2018).

⁶⁹ Waverly McCarthy, *Wilkinson Correctional Facility Inmate Dies After Fight*, WLBT (Aug. 23, 2018), <https://www.wlbt.com/story/38930211/wilkinson-county-correctional-facility-inmate-dies-after-fight/>.

⁷⁰ *Killings in Wilkinson County Correctional Facility in 2017 and 2018*, THE MARSHALL PROJECT (Jun. 25, 2019), <https://www.themarshallproject.org/documents/6167953-Wilkinson-Killings-2017-to-2018>.

- On January 31, 2018, a security camera captured the murder of Brad Fitch, who spent only six hours on Wilkinson's Unit F before he was shanked to death in a way one reporter called both "nonchalant" and "not unusual."⁷¹
- Also on January 31, 2018, Thomas Burks, 54, died as a result of strangulation after his original cellmate forced him to move to a new cell.⁷² MDOC officials reportedly did not notice he was living in the wrong cell until his new cellmate killed him.⁷³
- On May 8, 2017, Joseph Mc Govern, 24, was killed.⁷⁴
- On August 31, 2017, Deandre Davis, 39, died, reportedly after a fight. One prisoner was reportedly convicted of manslaughter as a result with as many as three others set for trial.⁷⁵
- On February 2, 2017, Eric Heinz, 33, was killed, reportedly after a fight.⁷⁶

The audit noted that Wilkinson's warden cooperates with gang leaders to maintain order in the facility. The warden reported "that is how Mississippi prisons operate – 'It ain't right, but[] it's the truth.'"⁷⁷

The warden appears to be correct. Due to rampant overincarceration and understaffing, gang control is prevalent at facilities throughout Mississippi. For example, the December 29, 2019 killing of Terrandance Robbins at **Southern Mississippi Correctional Institute (SMCI)** set off the violence that is currently consuming the prison system. SMCI is located in Leakesville, Mississippi and has a capacity of 3,082 and a population of 2,649 men as of December 2019.⁷⁸ Jimmy Anthony of the Mississippi Association of Gang Investigators (MAGI) reported that he has contacts within the system who told him that guards engaged in contraband and the narcotics trade had given keys to inmates which allowed them to get to inmates they wanted to attack.⁷⁹

⁷¹ *Killings in Wilkinson County Correctional Facility in 2017 and 2018*, THE MARSHALL PROJECT (Jun. 25, 2019), <https://www.themarshallproject.org/documents/6167953-Wilkinson-Killings-2017-to-2018>.

⁷² *Killings in Wilkinson County Correctional Facility in 2017 and 2018*, THE MARSHALL PROJECT (Jun. 25, 2019), <https://www.themarshallproject.org/documents/6167953-Wilkinson-Killings-2017-to-2018>.

⁷³ *Killings in Wilkinson County Correctional Facility in 2017 and 2018*, THE MARSHALL PROJECT (Jun. 25, 2019), <https://www.themarshallproject.org/documents/6167953-Wilkinson-Killings-2017-to-2018>.

⁷⁴ *Killings in Wilkinson County Correctional Facility in 2017 and 2018*, THE MARSHALL PROJECT (Jun. 25, 2019), <https://www.themarshallproject.org/documents/6167953-Wilkinson-Killings-2017-to-2018>.

⁷⁵ *Killings in Wilkinson County Correctional Facility in 2017 and 2018*, THE MARSHALL PROJECT (Jun. 25, 2019), <https://www.themarshallproject.org/documents/6167953-Wilkinson-Killings-2017-to-2018>.

⁷⁶ *State Inmate at Wilkinson County Dies*, MISS. DEP'T OF CORRS. (Feb. 27, 2017), <https://www.mdoc.ms.gov/Pages/State-Inmate-at-Wilkinson-County-Dies.aspx>.

⁷⁷ Joseph Neff & Alysia Santo, *Corporate Confession: Gangs Ran This Private Prison*, THE MARSHALL PROJECT (Jun. 26, 2019), <https://www.themarshallproject.org/2019/06/26/corporate-confession-gangs-ran-this-private-prison>.

⁷⁸ MISS. DEP'T OF CORRS., *Daily Inmate Population* (Dec. 2019), <https://www.mdoc.ms.gov/Admin-Finance/DailyInmatePopulation/2019-12%20Daily%20Inmate%20Population.pdf>.

⁷⁹ Therese Apel, *Investigators Say Gangster Disciples and Vice Lords Fighting in State Prisons*, WLBT (Jan. 4, 2020), <https://www.wlbt.com/2020/01/04/investigators-say-gangster-disciples-vice-lords-fighting-state-prisons/>. Anthony claims that other MAGI members had been warning state officials for years about increasing gang activity around the

SMCI said on the record in 2019 that the facility is controlled by gangs because there are not adequate staff to keep control.⁸⁰ During a tour of SMCI, a “high-ranking prison official” told state representative Jay Hughes and a local newspaper editor that gangs were running the facility and that staff were not safe.⁸¹ The accounts of gang control at SMCI are particularly egregious and shocking: people report that gangs assign residents to cells and beds, overriding the formal MDOC assignments; control access to phones; photograph prisoners, using contraband cell phones, to create and maintain unofficial databases; determine when and where individuals may eat and shower; and enforce fines against those who break gang-written rules.⁸² Gang members, with the knowledge and acquiescence of staff, have conducted their own strip searches in order to locate stolen contraband.⁸³ The problems at SMCI are well-documented, but over a year after changes were supposed to be made to address the critical security concerns, these problems persist.⁸⁴

Unsurprisingly, there is a staggering record of violence at SMCI. In 2018, 55 people were charged with assault, including nine against officers, and one murder.⁸⁵ Some examples of the egregious violence at SMCI include:

- In July 2019, Elijah Anderson was left on the prison floor for hours after having his head “slammed into a concrete wall” by gang members, according to his sister.⁸⁶ She reported that he was in an “almost vegetative state” due to bleeding in his brain.”⁸⁷

state: “This is reality. It’s happening today. It’s been building for about three years, and we’ve talked about it, we’ve tried to share it. This is not kids playing basketball on the corner. This is a multi-billion-dollar narcotics business.” *Id.*

⁸⁰ See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

⁸¹ See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

⁸² See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>; Affidavit of Tyler Comans, Jun. 17, 2019 (on file with Southern Poverty Law Center); Affidavit of Roy Ransom, May 15, 2019 (on file with Southern Poverty Law Center); Affidavit of David Gray, Jun. 26, 2019 (on file with Southern Poverty Law Center); Affidavit of Mario Rucker, Nov. 28, 2018 (on file with Southern Poverty Law Center).

⁸³ Affidavit of Dwaliue Deon Carter, Jun. 5, 2019 (on file with Southern Poverty Law Center).

⁸⁴ Doug Walker, *First Ever Meeting Reveals Severe Staff Shortages at South Mississippi Prison*, WLOX (Sept. 18, 2018), <https://www.wlox.com/2018/09/18/first-ever-meeting-reveals-severe-staff-shortages-south-mississippi-prison/>.

⁸⁵ See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

⁸⁶ See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

⁸⁷ Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

- In April 2019, Henry Armstead was beaten and burned so severely that he fell into a coma and had to be hospitalized and placed on a ventilator.⁸⁸
- In April 2019, Jeffery Wilemon was assaulted by gang members for disobeying the rules set by the gang and threatened with further beatings if he sought assistance. He was held hostage for 12 hours before being allowed to seek medical attention, at which point he had to be airlifted to a hospital for treatment to his severely damaged intestines, gallbladder, and spleen.⁸⁹
- In August 2018, an individual broke into the cell of Tony Howard Jr., doused him with gasoline and set him on fire.⁹⁰
- On August 3, 2018, Willie Hollingshead died at the age of 36. A year and a half later, MDOC has yet to release a cause of death beyond listing the death as a homicide. When Hollingshead's brothers retrieved his body from the mortuary to bury him, they noticed blue marks under his neck and bruises on his head, leading the family to conclude he was likely strangled.⁹¹
- On May 29, 2018 Eddie Shorty was ignored by guards overnight as he and other residents yelled for help while his cellmate beat him. Mr. Shorty had begged to be protected from his cellmate for weeks to no avail. Officers conducted no security checks, and a nurse eventually found Mr. Shorty bleeding in his cell in the overnight hours of May 30, 2018. Shorty died of blunt force injuries and strangulation.⁹²

Gang members also work key jobs in the daily administration of SMCI, allowing them unfettered discretion to grant or withhold crucial necessities. They work in the kitchen and food service and use that influence to withhold food in order to hoard or sell it or to punish disfavored prisoners.⁹³ The targets of this behavior must supplement their diets with food purchased from canteen if they can, or otherwise go hungry. Gangs also control the distribution of mattresses and blankets; unaffiliated individuals have gone weeks without being issued proper mattresses or bedding.⁹⁴

⁸⁸ Jimmie E. Gates, *'They Tried to Kill My Son.' Inmate in a Coma and Mother Wants Answers*, CLARION LEDGER (May 7, 2019), <https://www.clarionledger.com/story/news/politics/2019/05/07/prison-inmate-in-coma-mother-wants-answers-smci-mdoc-lockdown-guard-shortage/3661770002/>.

⁸⁹ See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

⁹⁰ Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

⁹¹ Michelle Liu, *Cause of Death: Undetermined*, MISS. TODAY (Dec. 4, 2019), <https://mississippitoday.org/2019/12/04/capstone-prison-deaths/>.

⁹² See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

⁹³ Affidavit of Eddie Joseph Brown, May 22, 2019 (on file with Southern Poverty Law Center); Affidavit of David Gray, May 22, 2019 (on file with Southern Poverty Law Center).

⁹⁴ Affidavit of Fredrick Bliss, May 15, 2019 (on file with Southern Poverty Law Center).

Deaths from unchecked violence have also occurred at **Central Mississippi Correctional Facility** (CMCF). Located in Pearl, Mississippi, CMCF is MDOC's largest facility, with a capacity of 4,094 and a population of 3,678 men and women as of December 2019.⁹⁵

- A woman incarcerated at CMCF died on December 12, 2019.⁹⁶ Reportedly, her death came shortly after she was beaten by staff in response to a disciplinary infraction.⁹⁷
- In late 2019, at CMCF, an individual was assaulted by gang members, despite having told several supervisory staff members beforehand that he feared he was at risk.⁹⁸
- On July 7, 2019, another woman, Veronica Boatman, died at CMCF. Her cause of death is listed as a homicide.⁹⁹
- On August 23, 2018, Nicole Rathmann died at CMCF just five days short of her release date. Her mother reported that she had suffered head injuries the month before her death from beatings, including being hit in the head with the phone and sustaining an injury that required four staples, and soon thereafter being beaten with a lock placed inside a sock.¹⁰⁰ MDOC told her mother the death was caused by an aneurysm but the source of the aneurysm was unclear, with one Mississippi official reportedly attributing it to meth use.¹⁰¹

The risk of violence and injury from rampant overincarceration and understaffing is not limited to incarcerated individuals but extends to officers and staff as well. **Marshall County Correctional Facility**, operated by MTC, is located in Holly Springs, Mississippi and has a capacity of 1,000 with a population of 996 men as of December 2019.¹⁰² In April 2019, one person captured an incident on a contraband cellphone in which a guard was beaten by other prisoners and left without

⁹⁵MISS. DEP'T OF CORR., Daily Inmate Population (Dec. 2019), <https://www.mdoc.ms.gov/Admin-Finance/DailyInmatePopulation/2019-12%20Daily%20Inmate%20Population.pdf>.

⁹⁶ Keisha Rowe, *Officials Investigating after Inmate Found Dead at Central Mississippi Correctional*, CLARION LEDGER (Dec. 13, 2019), <https://www.clarionledger.com/story/news/local/2019/12/13/inmate-found-dead-central-mississippi-correctional-facility/2642851001/>.

⁹⁷ Reported to Southern Poverty Law Center.

⁹⁸ Reported to Southern Poverty Law Center.

⁹⁹ Matt Clark & David M. Reutter, *Mississippi Prison Deaths Spike for Second Year; Disturbing Photos Revealed*, PRISON LEGAL NEWS (Oct. 7, 2019), <https://www.prisonlegalnews.org/news/2019/oct/7/mississippi-prison-deaths-spike-second-year-disturbing-photos-revealed/>.

¹⁰⁰ Michelle Liu, *Nicole Rathman Was Set to Go Home From Prison. She died Five Days Before Seeing Freedom*, MISS. TODAY (Aug. 31, 2018), <https://mississippitoday.org/2018/08/31/she-was-set-to-go-home-from-prison-she-died-five-days-before-seeing-freedom/>.

¹⁰¹ Michelle Liu, *Nicole Rathman Was Set to Go Home From Prison. She died Five Days Before Seeing Freedom*, MISS. TODAY (Aug. 31, 2018), <https://mississippitoday.org/2018/08/31/she-was-set-to-go-home-from-prison-she-died-five-days-before-seeing-freedom/>.

¹⁰²MISS. DEP'T OF CORR., Daily Inmate Population (Dec. 2019), <https://www.mdoc.ms.gov/Admin-Finance/DailyInmatePopulation/2019-12%20Daily%20Inmate%20Population.pdf>.

medical care for several minutes. Prisoners set a fire before help arrived.¹⁰³ In a federal civil rights case concerning conditions at **Eastern Mississippi Correctional Facility (EMCF)**, plaintiffs presented evidence that incarcerated individuals were routinely assaulted by others in the absence of staff presence or intervention.¹⁰⁴ The warden suggested staff were afraid to intervene, and MDOC's own court monitor refused to testify in open court out of fear of retribution from gang members.¹⁰⁵ EMCF is located in Meridian, Mississippi and has a capacity of 1500 with a population of 1,235 as of December, 2019.¹⁰⁶ Approximately 80% of the individuals incarcerated at EMCF have serious mental illness.¹⁰⁷

These are only some of the incidents of violence that rampant overincarceration and systemic understaffing have enabled in Mississippi's prisons. Because our knowledge is limited to what is publicly reported and the complaints that we receive, we think it likely that this is only the tip of the iceberg.

B. Failure to Perform Counts, Resulting in Increased Risk of Harm and Escapes

Due to overincarceration and inadequate staffing, Mississippi fails to ensure the performance of basic correctional tasks in its prisons that are necessary to maintain secure facilities. A chief example is the performance of prisoner counts, the routine practice in which prison staff verify that no individuals are missing and that the right people are in the right places. In testimony and press statements, current and former senior MDOC officials have agreed that accurate counts are the most important security-related task in corrections.¹⁰⁸

Yet abundant evidence indicates that counts are not performed correctly or consistently in Mississippi prisons, facilitating escapes and increasing the likelihood that individuals may move between cells or units to harm others without detection. For example:

¹⁰³ *Cellphone Video Shows Aftermath of Attack on Marshall County Prison Guard*, WMC5 (Apr. 5, 2019), <https://www.wmactionnews5.com/2019/04/05/cellphone-video-shows-aftermath-marshall-county-prison-guard-beating/>.

¹⁰⁴ Timothy Williams, *Inside a Private Prison: Blood, Suicide, and Poorly Paid Guards*, NEW YORK TIMES, April 23, 2018, <https://www.nytimes.com/2018/04/03/us/mississippi-private-prison-abuse.html>. See also, Arielle Dreher, *Private Prison on Trial: Inmates at "Bleak" Facility Tell Harrowing Stories*, JACKSON FREE PRESS, May 2, 2018, <https://www.jacksonfreepress.com/news/2018/may/02/private-prison-trial-in-mates-bleak-facility-tell-h/>.

¹⁰⁵ Arielle Dreher, *Private Prison on Trial: Inmates at "Bleak" Facility Tell Harrowing Stories*, JACKSON FREE PRESS, May 2, 2018, <https://www.jacksonfreepress.com/news/2018/may/02/private-prison-trial-in-mates-bleak-facility-tell-h/>.

¹⁰⁶ MISS. DEP'T OF CORR., *Daily Inmate Population* (Dec. 2019), <https://www.mdoc.ms.gov/Admin-Finance/DailyInmatePopulation/2019-12%20Daily%20Inmate%20Population.pdf>.

¹⁰⁷ Whitney Downard, *Doctor Calls Conditions at East Mississippi Correctional Facility "The Worst,"* THE MERIDIAN STAR, March 15, 2008, https://www.meridianstar.com/news/doctor-calls-conditions-at-east-mississippi-correctional-facility-the-worst/article_e8066086-2868-11e8-8c97-13427e6c659f.html.

¹⁰⁸ Trial Tr. vol. 13, 41:11-22, *Dockery v. Hall*, No. 3:13-cv-326 (S.D. Miss. Mar. 13, 2018) (on file with Southern Poverty Law Center) (Anthony Compton, MDOC Director of Private and Regional Prisons: "Counting inmates is the

- In October 2019, MDOC announced that an individual named Matthew Craig McKamey had escaped from Parchman. In fact, McKamey never left his housing unit, and another man named Darrie Price was missing—a fact that MDOC never publicized.¹⁰⁹
- In July 2019, one prisoner escaped from Parchman and two others escaped from CMCF in the same week.¹¹⁰
- In 2019, at least three people escaped from SMCI.¹¹¹
- At Wilkinson, auditors observed that counts were not properly supervised and were performed in violation of numerous policies, including that prisoners must provide identification, that no movement is allowed during counts, that food slots must be closed, that double counts must be conducted, that cell windows must be uncovered, and that staff must look into cells.¹¹² On one housing unit, “staff never even entered the pod to attempt a count.”¹¹³
- An SMCI memo from the facility’s superintendent strongly suggested that staff were falsifying prisoner counts.¹¹⁴
- Trial evidence adduced in March and April 2018 showed that counts were not being conducted properly at EMCF in 29 out of 32 months between 2014 and 2017.¹¹⁵

The failure to accurately, reliably, and routinely perform counts is one egregious example of Mississippi’s utter inability or refusal to adequately supervise people in its care, which exposes

number one priority in corrections.”); Michelle Liu, *Remember the Guy Who Escaped from Parchman? It Was Actually a Different Guy. Now the Misidentified Man’s Mother Fears Retaliation*, MISS. TODAY, (Oct. 21, 2019), <https://mississippitoday.org/2019/10/21/remember-the-guy-who-escaped-from-parchman-it-was-actually-a-different-guy-now-the-misidentified-mans-mother-fears-retaliation/> (retired Parchman superintendent Emmitt Sparkman: “Count is the most important thing you do to make sure you’ve got everybody there.”).

¹⁰⁹ Michelle Liu, *Remember the Guy Who Escaped from Parchman? It Was Actually a Different Guy. Now the Misidentified Man’s Mother Fears Retaliation*, MISS. TODAY, (Oct. 21, 2019), <https://mississippitoday.org/2019/10/21/remember-the-guy-who-escaped-from-parchman-it-was-actually-a-different-guy-now-the-misidentified-mans-mother-fears-retaliation/>.

¹¹⁰ Jimmie E. Gates, *Escaped Inmates’ Prison Clothes Found Near Business. Manhunt On in Rankin County*, CLARION LEDGER (Jul. 8, 2019), <https://www.clarionledger.com/story/news/2019/07/08/2-escaped-prison-in-mates-rankin-county-mississippi/1672169001/>.

¹¹¹ Jerry Mitchell, *Ticking Time Bomb: Violence Surges Among Guard Shortage, Lockdown at Mississippi Prison*, USA TODAY (Aug. 19, 2019), <https://www.usatoday.com/story/news/investigations/2019/08/19/prison-violence-surges-mississippi-prison-amid-guard-shortage/2054554001/>.

¹¹² MANAGEMENT & TRAINING CORP., *Wilkinson County Correctional Facility Comprehensive Audit* 4, 13–14 (Dec. 20, 2018).

¹¹³ MANAGEMENT & TRAINING CORP., *Wilkinson County Correctional Facility Comprehensive Audit* 4 (Dec. 20, 2018).

¹¹⁴ See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

¹¹⁵ Trial Tr. vol. 13, 12:22 – 13:24, *Dockery v. Hall*, No. 3:13-cv-326 (S.D. Miss. Mar. 13, 2018) (on file with Southern Poverty Law Center).

them to a risk of serious harm. Without accurate counts, staff cannot know if unaccounted-for persons are being assaulted, suffering medical emergencies, or otherwise in need of immediate assistance. Understaffing also puts the broader community at risk because it facilitates escapes, which are distressingly common at Mississippi prisons.

C. Lockdowns and Access to Programming

Even before the recent epidemic of violence at MDOC facilities, prisons around the state were regularly placed on extended lockdown because of violence and understaffing. Mississippi prisons routinely lack sufficient staff to safely allow people housed in general population out of their cells. The result is that prisoners frequently spend days and weeks locked down 22 hours a day or more, with no access to recreation, showers, opportunities to interact with anyone else, no educational or rehabilitative programming, or visitation by family.¹¹⁶ These lockdowns affect incarcerated people indiscriminately, without respect to any security threats they pose or disciplinary infractions they have committed, and can start and end without warning. These lockdowns also prevent individuals from participating in programming and work that allows them to earn good time credit toward their sentences. The inability of MDOC to manage its prisons safely contributes to lengthier sentences for individuals who are abiding by the rules but are prevented from engaging in rehabilitative and educational programming.

The use of lockdowns is constant and widespread.

- In January 2019, due to a “staffing crisis,” MDOC publicly placed SMCI on indefinite lockdown and cancelled all visitation and other privileges.¹¹⁷ In April 2019, Commissioner Hall reiterated that the suspension of nearly all privileges was required due to staffing.¹¹⁸ The lockdown was publicly known to be ongoing as of August 2019.¹¹⁹ Privately, people report that the lockdowns continue essentially unabated at SMCI, though the first family visitation in nearly a year was reportedly allowed in December 2019.¹²⁰

¹¹⁶ Jimmie E. Gates, *Treated Like 'Animals': Lockdown at Prison over Guard Shortage Entering 4th Month*, CLARION LEDGER (Apr. 29, 2019), <https://www.clarionledger.com/story/news/politics/2019/04/29/prison-lockdown-conditions-called-inhumane-not-enough-guards-mississippi-leakesville-smci-mdoc/3472313002/>.

¹¹⁷ MISS. DEP'T OF CORR., *SMCI Staffing Crisis Prompts Lockdown and Visitation Cancellation*, January 25, 2019, <https://www.mdoc.ms.gov/Pages/SMCI-Staffing-Crisis-Prompts-Lockdown-and-Visitation-Cancellation.aspx>.

¹¹⁸ Jimmie E. Gates, *Treated Like 'Animals': Lockdown at Prison over Guard Shortage Entering 4th Month*, CLARION LEDGER (Apr. 29, 2019), <https://www.clarionledger.com/story/news/politics/2019/04/29/prison-lockdown-conditions-called-inhumane-not-enough-guards-mississippi-leakesville-smci-mdoc/3472313002/>.

¹¹⁹ See Jerry Mitchell, *Inside The Prison Where Inmates Set Each Other On Fire and Gangs Have More Power Than Guards*, PROPUBLICA (Aug. 19, 2019), <https://www.propublica.org/article/leakesville-south-mississippi-correctional-institution-prison-gangs>.

¹²⁰ Reported to Southern Law Center and American Civil Liberties Union of Mississippi.

- Men at Parchman have reported they go weeks at a time on lockdown without access to showers or outside recreation.¹²¹ One mother told SPLC her son had not seen sunlight in seven months.¹²²
- In September 2019, individuals at CMCF privately reported that they were locked down 24 hours per day at least two days per week, even in general population, without access to showers or any out-of-cell privileges. People held in protective custody were also not being given any access to classes or other programming, though they should be allowed the same privileges as those in general population of the same custody level.¹²³
- In MTC's December 2018 audit of Wilkinson, auditors found that, according to prison logs, those people held in solitary confinement were not being given adequate access to recreation. People held in solitary confinement suffer even greater harm due to inadequate staffing. Because they are locked down in their cells all day, they rely on correctional officers to provide their every need, including meals, medication, medical attention, and access to showers and recreation. Moreover, upon reviewing video evidence, the auditors found that almost all of the recreation time that *was* documented on those logs was falsified and did not actually did not take place.¹²⁴ The audit concluded that two whole housing pods received *no recreation at all for sixty days*, and that one pod received recreation on a single day—when residents were left outside for more than seven hours so that a drug-sniffing dog could search their cells.¹²⁵ The audit could not even discern when people in general population had last received outdoor recreation but placed the most likely date in August, some four months prior to the audit.¹²⁶
- At Marshall, prisoners have been urged to falsify programming roll sheets, representing that they attended classes when they were not held.¹²⁷ Also at Marshall, people commonly receive meals four or five hours late due to understaffing, requiring urgent intervention to keep up diabetic patients' blood sugar.¹²⁸
- Beginning in October 2018, a "statewide incident" prompted a systemwide lockdown that lasted for at least three weeks.¹²⁹

¹²¹ Reported to Southern Poverty Law Center.

¹²² Telephone call with SPLC.

¹²³ Reported to Southern Poverty Law Center.

¹²⁴ MANAGEMENT & TRAINING CORP., *Wilkinson County Correctional Facility Comprehensive Audit 4* (Dec. 20, 2018).

¹²⁵ MANAGEMENT & TRAINING CORP., *Wilkinson County Correctional Facility Comprehensive Audit 4* (Dec. 20, 2018).

¹²⁶ MANAGEMENT & TRAINING CORP., *Wilkinson County Correctional Facility Comprehensive Audit 4* (Dec. 20, 2018).

¹²⁷ Reported to MacArthur Justice Center.

¹²⁸ Reported to MacArthur Justice Center.

¹²⁹ Therese Apel, *All MDOC Facilities on Lockdown After 'Statewide Incident'*, MISSISSIPPI CLARION LEDGER, October 22, 2018, <https://www.clarionledger.com/story/news/local/2018/10/22/all-mdoc-facilities-locked-down-after-statewide-incident/1730842002/>. See also,

Extended lockdowns may violate the federal rights of people in prison, who can spend days and weeks locked in their cells in conditions amounting to solitary confinement without access to basic privileges including recreation, showers, and visitation.¹³⁰ Such conditions may cause substantial harm in violation of the Eighth Amendment.¹³¹ Where they cause people not to receive access to services and programming to which they are entitled under policy, these conditions may also result in the deprivation of protected liberty interests in violation of the Due Process Clause of the Fourteenth Amendment.¹³²

III. POOR FACILITIES, INADEQUATE HEALTHCARE, AND OTHER CONSTITUTIONALLY DEFICIENT CONDITIONS AT MDOC

The widespread failure of MDOC to provide constitutional care to the individuals in its custody is not limited to its failure to protect them from harm. MDOC houses individuals in outdated, decrepit facilities with serious sanitation, plumbing, heating, and electrical problems. SPLC has received frequent reports of standing water and sewage, nonfunctioning or malfunctioning lighting, black mold, exposed wiring, gas leaks, contaminated water, and inedible and inadequate food.

Advocates have been attempting to remedy the brutal conditions at Parchman since the 1970s through lawsuits challenging infrastructural, environmental, and medical conditions at the prison.¹³³ Recent media reports and advocacy confirm that Parchman's physical plant, medical services, and mental health care are in a desperate state:

MISS DEP'T OF CORRS., *Lockdown Ended for Remaining Facilities* Press Release (Nov. 21, 2018), <https://www.mdoc.ms.gov/News/PressReleases/Lockdown%20Ended%20for%20Remaining%20Facilities.pdf>.

¹³⁰ *E.g.*, *Turley v. Rednour*, 729 F.3d 645, 652 (7th Cir. 2013) (prisoner stated an Eighth Amendment claim by alleging "a pattern of prison-wide lockdowns, which . . . occurred for flimsy reasons or no reason at all"). Separately, courts have found conditions of solitary confinement to violate the Eighth Amendment. *See, e.g.*, Order, *Braggs v. Dunn*, No. 2:14-cv-00601-MHT-TFM at *205 (M.D. Ala. Jun. 27, 2017), ECF No. 1285 (Alabama Department of Corrections' solitary confinement practices regarding mentally ill prisoners violate the Eighth Amendment); *Porter v. Clarke*, 290 F. Supp. 3d 518, 529, 532 (E.D. Va. 2018) (citing "rapidly evolving information available about the potential harmful effects of solitary confinement" in holding Virginia Department of Corrections' practices unconstitutional); *Palokovic v. Wetzel*, 854 F.3d 209, 226 (3d Cir. 2017); *Indiana Protection & Advocacy Services Comm'n v. Comm'r*, 2012 WL 6738517 (S.D. Ind., Dec. 31, 2012); *Jones 'El v. Berge*, 164 F. Supp. 2d 1096, 1101-02 (W.D. Wis. 2001).

¹³¹ *See, e.g.*, *Norwood v. Woodford*, 661 F. Supp. 2d 1148, 1155-56 (S.D. Ca. 2009) (five-week denial of outdoor recreation could constitute Eighth Amendment violation); *Lopez v. Smith*, 203 F.3d 1122, 1133 (9th Cir. 2000) (same, for six-and-a-half-week denial).

¹³² *See Sandin v. Conner*, 515 U.S. 472, 484 (1995) (liberty interest may exist where regulations provide for "freedom from restraint which . . . imposes atypical and significant hardship on inmate in relation to ordinary incidents of prison life"); *Wilkerson v. Goodwin*, 774 F.3d 845, 848-49 (5th Cir. 2014) (liberty interest implicated by extended placement in solitary confinement for 23 hours per day without full exercise privileges or human contact).

¹³³ *See, e.g.*, *Gates v. Collier*, 349 F. Supp. 881 (N.D. Miss. 1972); *Presley v. Epps*, No. 4:05-CV-00148 (N.D. Miss. June 22, 2005).

- A June 2019 Mississippi Department of Health inspection documented “more than 400 cells with problems such as flooding and leaks, lack of lights, power and water, broken toilets and sinks as well as missing pillows and mattresses.”¹³⁴
- In April of 2018, two men were found dead of apparent suicide.¹³⁵ Five more prisoner deaths followed that August at the facility.
- In November 2019, a man killed himself at Parchman. Though he had previously complained of suicidal ideation, he was placed in a single-man cell with the means to kill himself and left without staff supervision. Reportedly, staff did not discover his body for as long as 20 hours.¹³⁶
- In 2015, the MacArthur Justice Institute led a campaign to improve the deplorable conditions on Mississippi’s death row at Unit 29 at Parchman.¹³⁷ Death row prisoners reported an initial improvement to the number of leaks and plumbing defects, but recent reports indicate significant backsliding. In addition, several death row prisoners regularly complain of chronic medical care issues, which go ignored in the context of improving conditions.

These systemic conditions problems are not limited to Parchman. Mississippi spent only \$3,770 on healthcare per inmate in 2015. The national median expenditure was almost twice that, at \$5,720.¹³⁸ Prisoner deaths related to chronic, but treatable, medical conditions are common, as are suicides, and poor conditions are endemic throughout MDOC. The following are just a few examples:

- 58-year old Ricky Martin died at CMCF after complaining to guards that he was having trouble breathing. The guards went to sleep. Hours later, when help finally arrived, the facility’s defibrillator did not work.¹³⁹
- 57-year old Albert McGee died in SMCJ in August 2018 allegedly due to complications from diabetes, a chronic illness usually manageable with appropriate care.¹⁴⁰

¹³⁴ Michelle Liu, *No Water, No Lights and Broken Toilets: Parchman Health Inspection Uncovers Hundreds of Problems, Many Repeat Violations*, MISS. TODAY, <https://mississippitoday.org/2019/08/05/no-water-no-lights-and-broken-toilets-parchman-health-inspection-uncovers-hundreds-of-problems-many-repeat-violations> (Aug. 5, 2019).

¹³⁵ Sarah Fowler, *One Month, 16 Dead in MDOC Custody*, MISS. CLARION LEDGER, <https://www.clarionledger.com/story/news/2018/09/04/16-in-mates-dead-mdoc-custody-august/1195953002/> (Sept. 4, 2018).

¹³⁶ Reported to Southern Poverty Law Center.

¹³⁷ See *MacArthur Justice Center Students Enforce Death Row Settlement* (Feb. 9, 2017), <https://law.olemiss.edu/macarthur-justice-center-students-visit-parchman/>.

¹³⁸ Matt McKillop, *Prison Health Care Spending Varies Dramatically by State*, PEW, <https://www.pewtrusts.org/en/research-and-analysis/articles/2017/12/15/prison-health-care-spending-varies-dramatically-by-state> (Dec. 15, 2017).

¹³⁹ Michelle Liu & Alex Rozier, *Mississippi Short on Answers in Rash of Jail Inmate Deaths*, https://www.meridianstar.com/news/state/mississippi-short-on-answers-in-rash-of-jail-inmate-deaths/article_6000bd8d-053a-5cbb-848a-34aca8ab7d98.html (Aug. 24, 2018).

¹⁴⁰ Jon Schuppe & Teresa Frenzel, *16 Prisoners Died in One Month in Mississippi. Their families Want to Know Why*, NBC NEWS, <https://www.nbcnews.com/news/us-news/16-prisoners-died-one-month-mississippi-their-families-want-know-n905611> (Sept. 1, 2018).

- In 2017, individuals incarcerated at EMCF went on a hunger strike to protest the conditions inside the facility.¹⁴¹ In 2018, Plaintiffs presented evidence at a civil rights trial challenging conditions at EMCF of squalor, rats, and preventable deaths.¹⁴² In 2019, at least two men committed suicide at EMCF.¹⁴³

The constitutional failures of Mississippi's prison system are not limited to a single issue, nor a single facility. Rather, they are profound and widespread, resulting from years of neglect compounded by severe understaffing. Only a system-wide constitutional investigation, combined with decarceration efforts, can resolve the crisis.

IV CONCLUSION

Mississippi's officials and legislators have been well aware of but taken no steps to remedy the overincarceration and understaffing crisis that has been building for years, resulting in dozens of deaths and culminating in the violence of the last two weeks. State officials acknowledge but simply refuse to address the dangerous, widespread staffing shortages at state and privately-operated MDOC facilities. As a result, some 20,000 people in MDOC custody are systemically exposed to substantial risks of serious harm in violation of the Eighth Amendment. They are held in conditions amounting to solitary confinement due to arbitrary, indefinite lockdowns caused by a lack of staff. Their basic human needs—for food, water, warmth, exercise, medical attention, and more—go ignored and unfulfilled. They are exposed to persistent threats of violence, including from gangs that effectively manage housing units and control the lives of people residing there, in the absence of sufficient numbers of correctional staff.

Mississippi's deliberate indifference to the risk of harm caused by overincarceration and grossly inadequate staffing violates the federal rights of the people in its custody and care. Public reporting, political pressure, and private advocacy have failed to achieve meaningful results. Nothing short of investigation and, if necessary, enforcement action by the Department of Justice will compel Mississippi to cease violating the federal constitutional rights of people held in its decaying and understaffed prisons. We urge the Department of Justice to immediately open a CRIPA investigation into the Mississippi Department of Corrections for failure to protect the individuals it incarcerates from harm.

¹⁴¹ Jimmie E. Gates, *Treated Like 'Animals:' Lockdown at Prison Over Guard Shortage Entering Fourth Month*, MISSISSIPPI CLARION LEDGER, April 29, 2019, <https://www.clarionledger.com/story/news/politics/2019/04/29/prison-lockdown-conditions-called-inhumane-not-enough-guards-mississippi-leakesville-smci-mdoc/3472313002/>

¹⁴² Arielle Dreher, *Private Prison Trial Stars Today Over Alleged Squalor, Rats, Deaths*, JACKSON FREE PRESS, March 5, 2018, <https://www.jacksonfreepress.com/news/2018/mar/05/private-prison-trial-starts-today-over-alleged-squ/>.

¹⁴³ See Michelle Liu, *Deaths Up Threefold at Private East Mississippi Prison Where Inmate Died Last Week*, MISSISSIPPI TODAY, Jan. 24, 2019. November 2019 suicide reported to Southern Poverty Law Center.

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