

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

LaShawn Jones, et al.)	
)	
)	CLASS ACTION
)	Case No. 2:12cv00859
Plaintiffs,)	
v.)	
)	
MARLIN GUSMAN, Sheriff, Orleans Parish, et al.)	
)	
Defendants.)	

**PLAINTIFFS’ NOTICE OF SUPPLEMENTAL FILING IN SUPPORT OF CLASS
CERTIFICATION**

Today, the United States Department of Justice released its Report on Sexual Victimization in Prisons and Jails (“DOJ Report”) (Exhibit 1). This report contains the findings of the Review Panel on Prison Rape (“Panel”). The Panel held hearings in Washington D.C. during the fall of 2011 during which Orleans Parish Prison (“OPP”) was identified as a jail that had reported an unusually high incidence of sexual abuse and victimization. *epo, , III.*

The DOJ Report describes in detail the culture of sexual violence and the lack of accountability that permeates OPP. These findings confirm many of the allegations contained in the Plaintiffs’ complaint. For this reason, the Plaintiffs hereby file a copy of the Report with this Honorable Court, in support of their motion for class certification.

As a jail that has a high incidence of sexual abuse and victimization, the Panel carefully investigated OPP operations. *epo, , .* The investigation consisted of requests for supplemental data from the Orleans Parish Sheriff’s office, notarized statements from Sheriff Gusman, who was unable to appear in person before the U.S. Department of Justice Panel

- 4) The Panel concurs with the DOJ Civil Rights Divisions which concluded that “Staffing levels at OPP are inadequate to protect inmates from harm.” . *d-*
- 5) The Panel also recommended that OPP implement an objective classification system that “protects vulnerable inmates from sexual assault.” . *d-*

Given the DOJ Report’s relevance to the instant case, and the significant factual overlap between the Panel’s conclusions and the Plaintiff’s allegations in the instant case, the Plaintiffs respectfully provide this Report to the Court in support of their Motion for Class Certification. This Report makes clear that the violations outlined in Plaintiffs’ complaint are system-wide in nature, such that class certification is appropriate.

RESPECTFULLY SUBMITTED, this the 9th day of April 2012.

I/s/ Katie M. Schwartzmann
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent by email to all parties by the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System. A copy is also being placed in the U.S. Mail.

This 9th day of April, 2012.

/s/ Katie Schwartzmann