

EXHIBIT B-8

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARANDA LYNN O'DONNELL, et al.	)	
	)	
Plaintiffs,	)	
	)	Case No. 16-cv-01414
v.	)	(Class Action)
	)	The Honorable Lee H. Rosenthal
HARRIS COUNTY, TEXAS, et al.	)	U.S. District Judge
	)	
Defendants.	)	
	)	

DECLARATION OF DETENTION OFFICER AMY LINDSEY

1. My name is Amy Lindsey. The facts set forth in this declaration are based on my personal knowledge, unless otherwise indicated, and, if called as a witness, I could and would testify thereto. I am over eighteen years of age and of sound mind to declare to the facts stated herein.

2. I am a Detention Officer with the Harris County Sheriff's Office ("HCSO"). I serve as a Receiving Quality Control ("Receiving QC") Officer in the receiving area of the Joint Processing Center ("JPC"), which means that I direct where arrestees need to go in the intake and booking process, and ensure that each person is moving through that process as efficiently as possible. I have been a HCSO employee since 2015 and have worked at the JPC helping to process arrestees for the last seven years, since 2019.

A. Processing of arrestees at the JPC.

3. The JPC is the facility that processes people arrested by any of the dozens of law enforcement agencies with jurisdiction to make arrests in Harris County. When a law enforcement agency, such as the Houston Police Department, makes an arrest for a Class A or B misdemeanor

or felony offense, the arresting agency will bring the person to the JPC for processing. The JPC also processes certain people arrested based on a warrant in a Class C misdemeanor case.

4. Once a person arrives at the JPC, the person is brought in through the first floor where the person is searched and given jail-issued clothing. Jail staff also take the person's fingerprints. As part of the intake process, jail staff conduct an intake screening that assesses the arrested person's needs for social services referral, any medical vulnerabilities, and their criminal history. For some people, their answers will immediately trigger medical treatment, meaning they go straight to the medical unit within the JPC.

5. Those who are not automatically referred to medical during their intake screening, will be taken to the second floor to continue through the process. On the second floor, there is a large room that holds about 200 people, including HCSO employees. Jail staff refer to this room as "Receiving." There are holding cells, booths for the Harris County Public Defender's Office ("HCPDO"), and many rows of chairs. The magistrate courtrooms are accessible through doors in Receiving. Many arrestees spend several hours in Receiving.

6. As a Receiving QC, I am responsible for ensuring that individuals in Receiving get where they need to go. That means directing arrestees, HCSO employees on duty, and civilian personnel to the appropriate locations, such as ensuring that arrestees can meet with Pre-Trial Services and the public defender to be scheduled for and attend a timely magistration.

7. This is a dynamic and complicated process. First, arrestees will meet with and be interviewed by an employee of Pre-Trial Services ("PTS"). Arrestees who do not receive a General Order Bond ("GOB") will then meet with the public defender who will represent them at their bail hearing. These non-GOB eligible arrestees will then be scheduled for a magistration hearing, after which, they will be sent back into Receiving to await the next steps. Based on the outcome of the

court appearance, the arrestee will either complete the rest of the booking process or proceed with the releasing process. Because of the number of arrestees and departments/entities involved, the booking process that occurs after magistration can take over 24-hours.

8. For individuals designated to receive a GOB, their process is much quicker. They meet with someone from PTS and then move from Receiving to our pre-release area. On average, a person who receives a GOB will be released within about sixteen hours of arriving at the jail.

9. Receiving is an area with many moving parts. It requires dozens of county employees to work together to process arrestees quickly, fairly, and efficiently. On an average day, HCSO processes anywhere from 275 to 380 arrestees a day through the JPC. That means, on an average eight-hour shift, I'm responsible for ensuring that 100 or more arrestees get to where they need to go. A delay in getting an arrestee to their public defender interview, for example, can set the whole process back by delaying magistration dockets or delaying other arrestees' public defender interviews. Each step in the system can become a potential bottleneck, delaying the pre-trial process for everyone.

10. The more arrestees who must be processed through the entire booking process, the greater the likelihood of delays and bottlenecks. Every person who is released on a GOB is another person who does not continue waiting for their opportunity to speak with an available public defender; another person who does not have to be added to one of the limited dockets for magistration; and another person who does not need to be guided from place to place by the JPC's finite number of officers. If we had to do a complete booking process for all arrestees currently receiving GOBs, the JPC would be constantly overloaded with arrestees, making delays more likely.

11. If arrestees were no longer released on GOBs the resulting process delays could have an adverse impact on operations. For instance, I believe the system would struggle to set bail within 48 hours. And if the JPC is overwhelmed with delays, it will make it difficult to ensure that every misdemeanor and felony arrestee has probable cause determined within 48 hours. If that deadline is not met, I understand that, under state law, the person will be released.

12. Delays can increase safety concerns. In managing such a large population of arrestees, I have found that some become aggressive and combative the longer they wait in one area. When we encounter a backlog, that is when behavioral issues, including violence, can occur. If the process slows down, that could lead to a delay in arrestees being interviewed by Pre-Trial, the public defenders, and by medical personnel.

13. An increase in arrestees could increase overall safety concerns for arrestees and staff, alike. Additionally, detention personnel at the JPC are responsible for the security of civilian staff such as medical personnel, pretrial services, public defenders, and any other civilians who may be working, volunteering, or touring the facility. The demand for safety in Receiving would place greater responsibility on all detention personnel at the JPC.

14. In a system with budgeted resources that requires the cooperation of multiple departments and law enforcement agencies, GOBs have proven critical. GOBs are estimated to make up as much of 60% of arrestees coming into Receiving. On an average, less populated day, we can process about 71 people with GOBs. On days when the jail population is higher, the number of arrestees processed with GOBs would also be higher.

15. Promptly releasing these low-risk offenders is a win-win. We get to focus more resources on supervising the more serious cases, while the arrestee is promptly released without having to be in jail for an additional 12-24 hours. Many of the arrestees released on GOBs are first-

time offenders or individuals with a lower-risk profile compared to other individuals processed at JPC. As a detention officer, I acknowledge that GOBs allow detention staff to focus on felony offenders.

16. Without the GOBs, more resources would be needed to process the hundreds of arrestees every week who are currently released on GOBs, which would delay PTS interviews and HCPDO consultations, result in bigger and slower magistration dockets, and lead to even potential unnecessary overcrowding in the JPC. The JPC is not built to handle a quantity of people beyond maximum capacity for long periods of time.

I declare under penalty of perjury that the foregoing is true and correct.

Amy Lindsey
Detention Officer Amy Lindsey
Harris County, Texas

8/25/26
Date