

EXHIBIT B-11

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

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

DECLARATION OF KRISHNAVENI GUNDU

1. My name is Krishnaveni Gundu. 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 co-founder and the current Executive Director of Texas Jail Project (“TJP”). TJP is a non-profit organization that advocates for and with individuals incarcerated in Texas county jails and their loved ones. Our work focuses on organizing impacted families through stories, testimonies, and community-building. TJP holds jails, as well as the entire criminal punishment system, accountable—informing lawmakers and the public alike about civil rights violations, mistreatment, and medical neglect inside Texas’s county jails, and demanding concrete policy changes at the local and state level.

3. At the Texas Judicial Commission on Mental Health, I serve on an advisory group called the Collaborative Council and its Data and Legislative Research committees. I was previously an invited member of the criminal justice, pro bono and mental health statewide

committees of the Texas Coordinating Council on Veterans Services and an invited member on the Intellectual and Developmental Disability Advisory Committee that was mandated by the 86th Texas Legislature in 2019.

4. I was appointed to and currently serve as a voting member on the Texas Commission on Jail Standards' ("TCJS") Administrative Rules Advisory Committee, which reviews the Commission's minimum standards and makes recommendations for changes. Both the current and prior Executive Director of TCJS have had a strong relationship with TJP, and have expressed to me an understanding and appreciation of our role as accountability partners.

5. Through my work with TJP, I have more than 19 years of experience monitoring jail conditions, assisting loved ones in navigating the criminal legal system, and organizing with Texas communities affected by pretrial detention.

I. Pretrial Detention Harms Indigent Arrestees, Their Families, and Their Communities.

6. As part of TJP's standard accountability work in Harris County, we receive letters and phone calls from individuals confined in the Harris County Jail and their loved ones. We also receive requests for support from government stakeholders such as public defenders and service providers. Many times, in these communications, people seek assistance such as navigating the jail's medical system or contacting their public defense attorney. To conduct this work, we regularly survey and review stories and data from across the state.

7. Across these accounts of pretrial detention and requests for assistance, common themes have emerged. Individuals detained pretrial are almost invariably in jail because they cannot afford to post their secured bond amount. That means, if they had the money to pay their bond, they would be released. But because they lack the money to post their bond, they must

remain detained until either they find the money for bond, the bond is lowered by the court, or their case is resolved.

8. Based on my decades of experience monitoring Harris County Jail, I have found that pretrial detention separates families, destabilizes people's lives, and disrupts people's healthcare. For arrestees suffering from mental health disabilities, pretrial detention can accelerate their decompensation. Because of these serious consequences on the lives of arrestees, Harris County should strive to minimize, wherever possible, its use of pretrial detention.

9. Across the thousands of individuals we have worked with, the most common harm of pretrial detention is that it separates families, potentially causing lasting damage. We have worked with mothers, fathers, sons, and daughters, all detained because they cannot afford cash bail. By removing a parent from a child's life, pretrial detention inflicts serious emotional damage on both the parent and young person.

10. Removing someone from their family and community can also have serious financial consequences. Individuals frequently come to us seeking emergency financial assistance because pretrial detention makes it impossible for them to go to work, keep their job, pay their rent, or provide for their families.

11. Even brief stays in Harris County Jail can interrupt a person's healthcare. We frequently coordinate with appointed defense attorneys, Harris Health, and the Harris County Sheriff's Office, to ensure individuals detained in the Harris County Jail receive adequate medical care. In our experience, jail disrupts a person's continuity of care. For example, someone may be receiving consistent psychiatric treatment in the community, taking certain doses of medication, and regularly seeing the same healthcare professional. Confinement in jail disrupts that continuity, frequently resulting in less trusting provider-patient relationships, providing the wrong dose of

medication, or missing pre-existing conditions that the person either forgets to share or intentionally hides due to mistrust.

12. Even when a person does seek medical care in jail, the provision of that care can be significantly delayed, turning manageable medical issues into full blown emergencies. In my experience, that is because jail medical staff do not have the same resources that community-based providers can access and what resources they do have are frequently strained.

13. The risks of jail-based healthcare are particularly acute for pregnant women. We have received many requests for assistance from pregnant women, or their loved ones, detained in the Harris County Jail. Due to the stress and anxiety of jail, these pregnancies are frequently higher risk. And disrupting that person's care by detaining them only magnifies those risks. As a result, we have worked with numerous families who suffered a miscarriage while detained in the Harris County Jail.

14. Lastly, we regularly receive requests for assistance from individuals with intellectual or developmental disabilities. For these folks, jail rapidly accelerates their decompensation, meaning that they quickly begin to lose whatever intellectual capacity they had prior to being detained in jail.

15. The impacts of pretrial detention can have life or death consequences as dozens of people have died in the jail, the vast majority of which were detained pretrial on unaffordable bail.

16. Overall, pretrial detention inflicts an immense harm on people detained in jail, their families and communities, and the broader health of the community. Because of these harms, TJP advocates for a decreased emphasis on pretrial detention, wherever safe and feasible, and a greater reliance on the public health system to provide people the treatment they need and deserve.

II. The *ODonnell* Consent Decree Prevents Some of the Harms of Pretrial Detention.

17. In my decades of experience working with people detained in county jails and their families, I have found the *ODonnell* Consent Decree reduces the preventable harms of pretrial detention discussed above. The Consent Decree ensures the prompt release of the majority of misdemeanor arrestees on unsecured bond.

18. In late 2022, TJP began interviewing people released from the Harris County Jail, one to two times a week for approximately six months. We stood outside the jail and spoke to people as they left. These interviews gave me further insight into conditions inside the Harris County Jail. They also resulted in the creation of Texas Freedom Stories, a short documentary about people released on General Order Bonds (“GOBs”). The documentary shares true and accurate depictions of the experiences of the interviewees. The experiences shared in the documentary are a representative sample of the deeply personal experiences that my organization is aware of.

19. A true and correct copy of the documentary is available at: <https://vimeo.com/760070752?fl=pl&fe=sh>. More information on the documentary project is available at: <https://www.texasfreedomstories.org/>.

20. The documentary centers on two individuals in Houston, Texas: Terranisha, a 31-year-old sole provider for her several kids, as well as a business owner; and Gavin, a 20-year-old devout Christian and provider for his family, working multiple jobs, as a ranch hand by day and construction worker by night. Both Terranisha and Gavin were charged with misdemeanors in Harris County, and released on a GOB.

III. Vacating the Consent Decree and GOB Process Would Likely Worsen Jail Overcrowding and the Harms of Pretrial Detention.

21. I understand that the Attorney General of Texas and four of the sixteen County Criminal Courts at Law Judges have asked the Court to vacate the Consent Decree or, at a minimum, significantly change Local Rule 9 to do away with the GOB process. I would expect this policy change to increase pretrial detention and increase the harms of pretrial detention that my organization works so hard to mitigate.

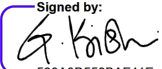
22. For years, Harris County, has incarcerated people at rate that far outpaces its ability to safely provide staff for, and supervise, the number of people detained in the jail. The inmate-to-staff ratio resulted in the Harris County Jail not only being out of compliance with state standards set by TCJS, but being placed under a remedial order from the Attorney General.

23. In the last year, though, the jail population has reduced significantly from a FY 2025 high of 9,808 to the current population of 8,349. These decreases brought Harris County Jail back into compliance with TCJS. In previous years, Harris County also contracted with out-of-county and out-of-state private facilities to detain thousands of people each year to keep their staffing ratios in compliance. As I understand it, Harris County cancelled one of these contracts and is now in the process of cancelling the remaining contracts because of reductions in the jail population.

24. Getting rid of GOBs could undermine this progress. According to the court-appointed monitors' most recent report, just under 28,000 people a year receive GOBs. I am not aware of any plan in place to deal with this increased volume. Harris County Jail has already been disciplined by TCJS and the Attorney General for understaffing relative to its population. Forcing another 28,000 people through the system would surely result in more people being detained for

longer. And inflicting the harms of pretrial detention on these people unnecessarily will only result in greater instability in these people's lives while the jail struggles to care for them.

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

Signed by:

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8/25/2026

Krishnaveni Gundu

Date