

EXHIBIT B-7

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**MARANDA LYNN ODONNELL, §
*et al***

Plaintiffs,

v.

HARRIS COUNTY, TEXAS, *et al*

Defendants.

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CIVIL ACTION NO. 4:16-CV-01414

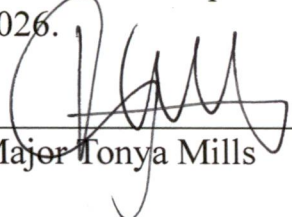
DECLARATION OF MAJOR TONYA MILLS

1. My name is Tonya Mills. The facts set forth are based on my personal knowledge. I am over 18 years of age.
2. I am Major with the Detention Management Bureau with the Harris County Sheriff's Office. I have been in this position since June 2026. I oversee the day-to-day operations of the Joint Processing Center (JPC). Prior to my current role, I was the Director of Justice Innovation with the Harris County Office of County Administration.
3. If General Order Bonds were eliminated, I would be responsible for overseeing changes at the Harris County JPC and other Sheriff's Office facilities.
4. I have been asked to give an estimate of the financial cost to the Harris County Sheriff's Office if General Order Bonds were eliminated. My estimates are based on Monitor Report data and other data from various Harris County databases.
5. Other stakeholders such as Harris County Pre-Trial Services, Harris County Public Defender's Office, Harris County District Attorney's Office, the County Courts and Harris Health would also be impacted. My estimates do not address the costs or impacts to those—or any other—Harris County departments.
6. If General Order Bonds were eliminated, additional jail beds would be needed due to an increase in the jail population. This is a direct result of longer processing times during which the Harris County Sheriff's Office must keep defendants in custody. Without General Order Bonds available for defendants charged only with misdemeanors, the jail population would have been higher by an average of 134 people each day in 2025, and Harris County would have paid an additional \$5.13 million to house, feed, and guard them. If General

Order bonds are eliminated, that cost will likely continue, or increase, each year.

7. The JPC has limited capacity. The capacity for Intake (initial screening) is 30 people at a time.
8. The capacity for Receiving (where arrestees are held awaiting detailed processing) is 200 people at a time. Arrestees now spend an average of 20-24 hours in Receiving. GOB arrestees are processed on average in about 10-18 hours while non-GOB arrestees are processed on average in around 36 hours. If General Order Bonds were eliminated, the processing time in Receiving would increase and likely fill up the holding areas. This would require additional holding areas and staff. If this capacity is reached, the JPC would also need to open additional posts.
9. Even if additional holding areas were not required, the JPC would require additional staff to aid in processing, primarily for additional security due to larger number of people in the Receiving area. I estimate an annual additional security staff cost of \$2.2M.
10. If General Order Bonds were eliminated, we would most likely need three additional posts to hold detainees in housing areas (the approximate 134 inmate increase). Because this staffing does not exist today, there would be an approximate \$3.5M cost to add staff for these three posts for year one. In subsequent years, these new staff would be calculated into the daily rate and would be inclusive in the overall cost.
11. I have learned that elimination of General Order Bonds would also require processing an estimated 70 additional defendants a day by Pre-Trial Services. This estimate can be reconciled with my 134-jail bed day estimate because, absent General Order Bonds, arrestees will be held for more than 24, possibly pushing 48 hours.
12. Finally, the Sheriff's office has developed a plan to reduce outsourced inmates by 550 in Fiscal Year 2027 and eliminate the need to send local detainees to Olla, Louisiana. If General Order Bonds are eliminated, the Sheriff will likely need to abandon this plan and maintain the contract. Assuming a stable jail population of 8,500, the Sheriff would need to outsource about 140 outsourced beds at a cost of \$4.6 million per year.

I declare under penalty of perjury that the foregoing is true and correct. Dated 9.17.2026, 2026.


Major Tonya Mills