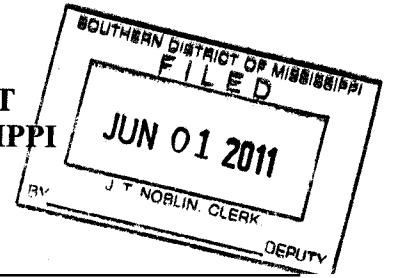
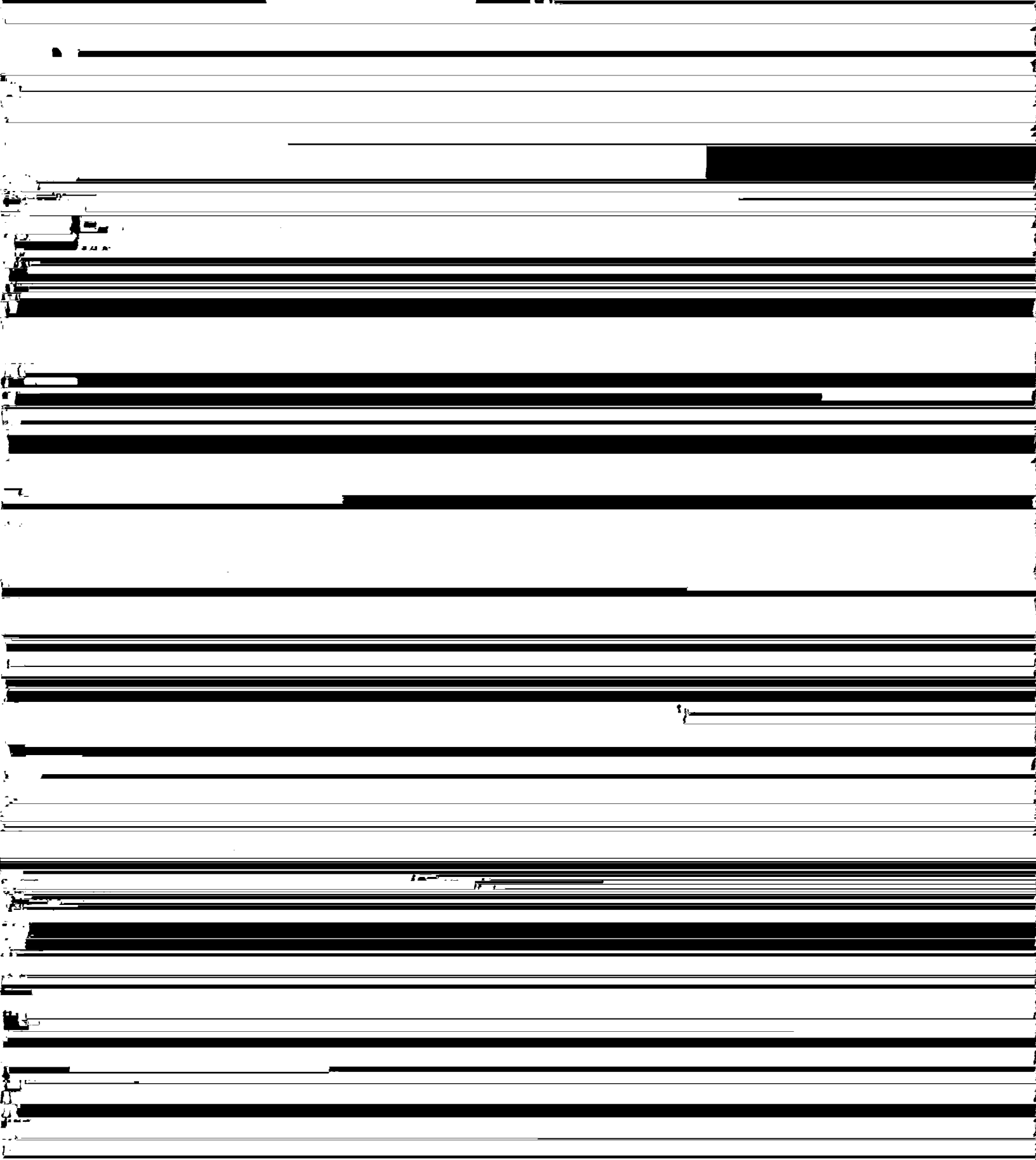


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION



_____)
I H by and through his next friend _____)

himself it would be okay—because there would be one less child to care for inside of the facility. Another staff member threatened to come to a child's house and harm his



5. Defendant Hinds County is a governmental entity with responsibility to “establish and maintain detention facilities, shelter facilities . . . or any other facility necessary to carry on the work of the youth court.” Miss. Code Ann. § 43-21-19. Hinds County is the entity with ultimate responsibility to secure and protect the rights of children held at Henley-Young.

JURISDICTION AND VENUE

6. The named Plaintiff’s cause of action arises under the Eighth and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983

7. Jurisdiction in this Court is proper pursuant to 28 U.S.C. § 1331.

8. Venue in this Court is proper under 28 U.S.C. § 1391(b). Defendant resides in this district, and the events and omissions complained of occurred in this district.

CLASS ACTION ALLEGATIONS

9. The named Plaintiff brings this suit on his own behalf and on behalf of all children who are, or will in the future be, imprisoned at the Henley-Young Juvenile Justice Center.

10. The class is so numerous that joinder of all members is impractical. Henley-Young has the capacity to house 84 youth at one time and well over 300 youth pass through the facility in a one-year time period. Accordingly, the Defendant has subjected hundreds of children to abusive conditions. Further, because children remain at Henley-Young for varying lengths of time, and the population changes on a

11. There are questions of law and fact common to all class members, including

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

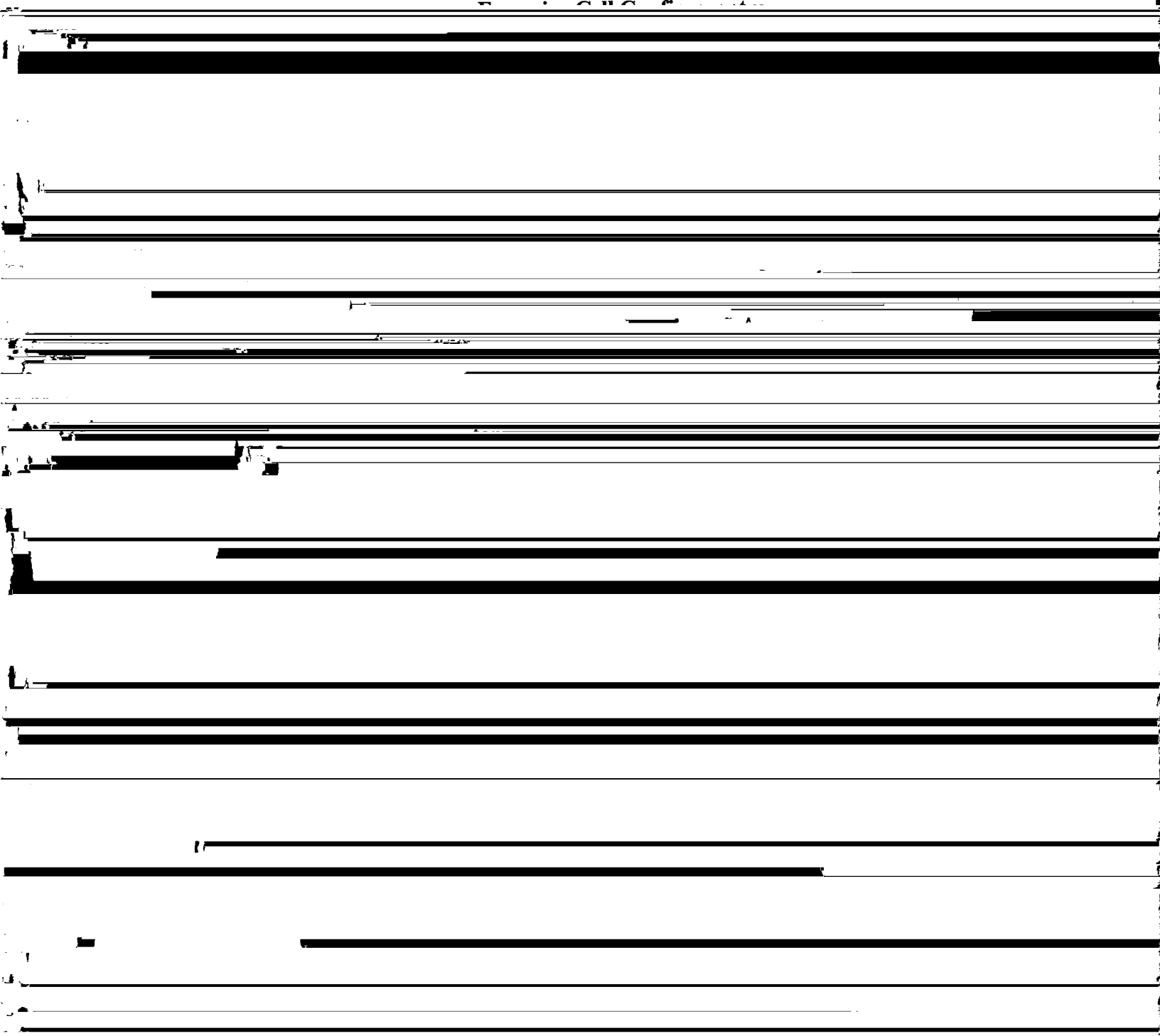
[REDACTED]

[REDACTED]

[REDACTED]

Youth Court. It may also hold youth for up to 90 days as a post-adjudication disposition. Miss. Code Ann. § 43-21-605(1)(k). Youth are regularly incarcerated at Henley-Young both before and after disposition.

16. This complaint describes conditions that currently exist and gives examples involving specific youth who are and recently were incarcerated at Henley-Young.



20. The Defendant fails to provide minimally adequate mental health services for the length in its custody. The Defendant has a policy and practice of denying the

[REDACTED]

been provided his medication. In response to this denial, J.H.'s mother brought his pills to the detention center. If J.H.'s mother had been unable to bring the medication to Henley-Young, it is likely that he would have been deprived of his medication for the duration of his detention. Despite his pronounced mental health needs, J.H. received no mental health counseling or treatment for the duration of his imprisonment at Henley-Young.

24. In April 2011, Henley-Youth staff denied W.J., a sixteen-year-old youth with serious mental health needs, the Melatonin, Cagentin, and Zyrtec that he regularly

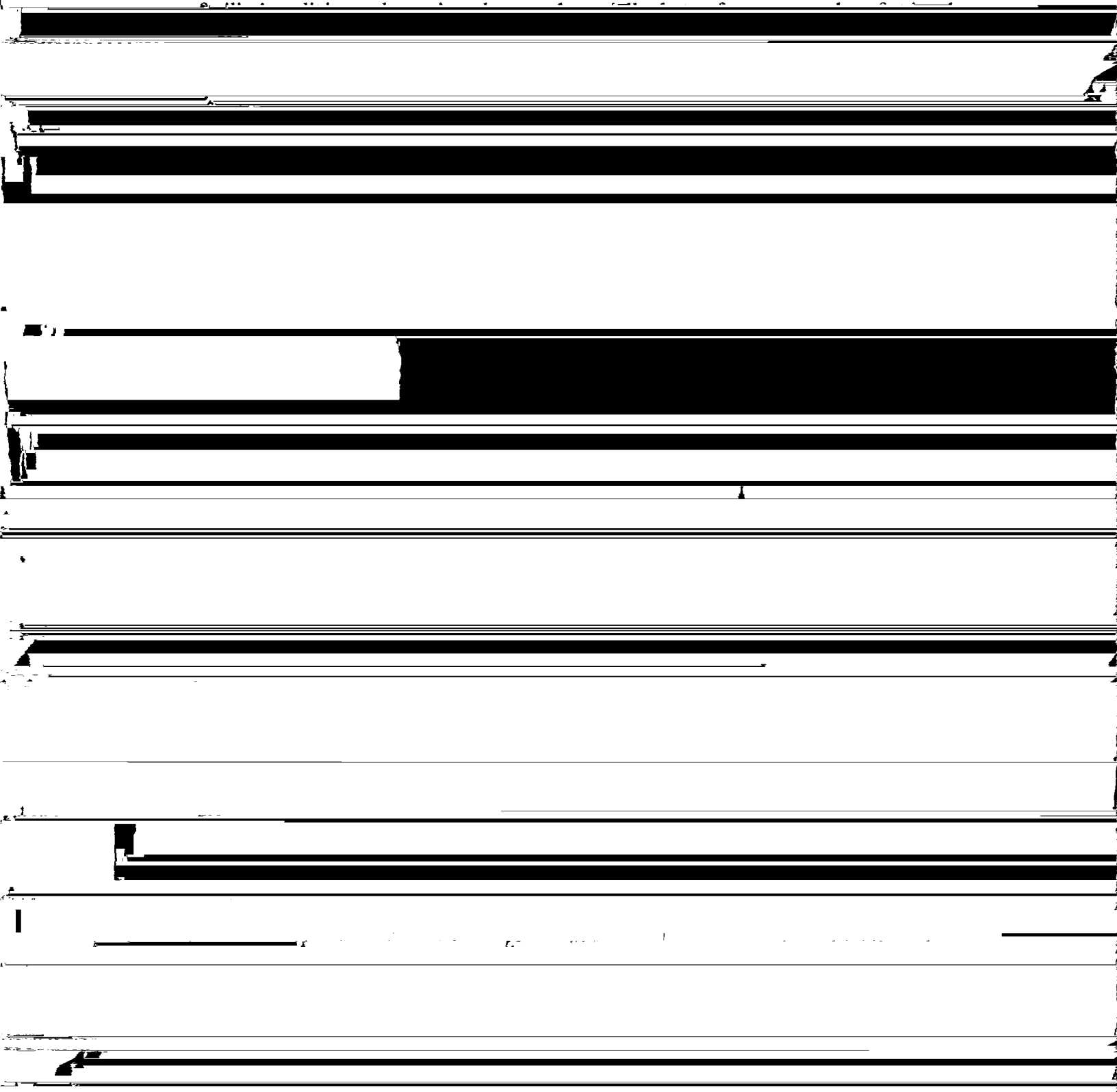
took in order to treat his mental health needs and to help him sleep. As a result of this denial, W.J. often had trouble falling asleep.

Verbal Abuse

27 Staff at Henley Young routinely subject youth confined at the facility to

verbal and physical abuse. The staff at the facility routinely subject youth to

31. The Defendant has a custom and/or practice of placing an unnecessary burden on a youth's ability to maintain contact with their family members. This communication is essential for children's treatment and rehabilitation and for their eventual reintegration into the community. It is also important to ensure that the



allowed the children in their custody to languish in an abusive facility despite having clear notice that these violations persist.

CAUSES OF ACTION

25 Plaintiff incorporates by reference all of the above factual allegations to

support the following claims:

[REDACTED]

ATI

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. Declare that the acts and omissions of the Defendant violate the federal law;

§ 1983, 42 U.S.C. § 1983, et al. (collectively, "§ 1983")

[REDACTED]

CERTIFICATE OF SERVICE

I, Corrie W. Cockrell, an attorney for the plaintiff, hereby certify that on June 1, 2011, a true and correct copy of the foregoing document was delivered to the Attorney for the Hinds County Board of Supervisors via hand delivery and electronic mail. Notice of this filing will be sent by e-mail to all parties by the Court's electronic filing system.

Dated: June 1, 2011



/s/ Corrie W. Cockrell, Miss. Bar No. 102376
Southern Poverty Law Center