

301196

said paper, which was introduced on the trial of the original case, said Conley said, responding to said rule:

"11. Respondent shows that through no fault of the County Sheriff, a sufficient inside force of guards has been provided by the County Authorities, only one man being paid by the County to guard twenty cell blocks distributed in twenty wings and over five floors; that it is a physical impossibility for this one man to keep up or even know what is transpiring on five different floors, or twenty separate immense wall and steel blocks, distributed through a large building; that with this inadequate force, which this Respondent is advised the Sheriff of this County has complained about, it is an absolute impossibility for the best Sheriff in the world or the best trained deputies to know exactly what is going on at any and all times or any reasonable part of the time; that the keys to practically all of the cell blocks are carried by 'convicted criminals', known as 'trusties', who turn in and out parties entering or leaving cell blocks, and while they have general instructions covering their duties, it is an impossibility for the inside deputy to know whether each is discharging his duty properly at all times; that the food is prepared and distributed in the County prison itself and practically by 'convicted criminals,' whose disregard for law and principle is written upon the criminal records of this State, that owing to this condition men have been known to saw through solid steel bars and cages and escape to freedom; that it would be easy for any one to reach or harm respondent or to poison him through his food, that the 'trusty turn keys' who are convicts can easily swear to admissions against the interest of this respondent, even though such admissions might not be made; that the friends of the Defendant in this case are allowed to pour constantly into the jail at all hours of the day and up to a late hour of the night, and are in close touch with many of these 'trusty turnkeys', and 'trusty attaches' of the jail; that while a prisoner at the County Prison before his transfer to the City Prison, a goodly number of people were admitted to the cell block to talk with Respondent,