

**DECLARATION OF** [REDACTED]

I, [REDACTED] make the following declaration based on my personal knowledge and declare under the penalty of perjury that the following is true and correct to the best of my knowledge and belief

1. My name is [REDACTED] I am 59 years old, and competent to give testimony. I am currently incarcerated at Deerfield Correctional Center. My Offender ID number is [REDACTED]
2. I have been at Deerfield since [REDACTED] Prior to that, I was housed at [REDACTED] since my arrest on [REDACTED] I reside in a dormitory style pod unit; with bunk beds, approximately 18 inches apart. It is not possible to stay 6 feet from each other. This is a geriatric unit; all of us are over 50 years old. There are 99 men in my pod.
3. I have high blood pressure and high cholesterol; I am taking two prescriptions: Lipitor and Losartin.
4. I have received no communications or education regarding COVID from prison staff. There is some information about COVID posted on the walls.
5. A counselor in our building tested positive for COVID in April. Thereafter, everyone in my pod was tested for COVID in April, 2020. Nobody in my pod was positive. Results were received April 23, 2020. 83 inmates who were positive within Deerfield were housed in the gym.
6. My housing has not changed due to COVID. We have not been tested since the April testing.
7. I have experienced some possible COVID symptoms, including shortness of breath. This was in early April. I told a nurse and was given oxygen treatment.
8. I am allowed to shower/bathe every day. I occasionally have access to a sink and soap for handwashing. I am provided one bar of soap per week. Soap is not regularly changed in the dispensers in the bathrooms. It is not always available.
9. Common items are cleaned by inmates about three times daily but this is not monitored. As of yesterday, the cleaning product being used is a pink colored cleaner that they call germicide. I have no clue what is in it.
10. Hand sanitizer is replenished twice weekly. We have to beg for it. It is not alcohol based.

11. If I request, I am provided with a spray bottle to clean. I have no clue what the cleaning product is but it is created in the chemicals room. It's the pink liquid they call germicide.
12. I was given two disposable masks last month. We were told that was a one time deal. They are no longer available. I have two cloth sneeze guards; one is taken to be cleaned every night. We are supposed to wear masks in the day area, but not everyone is doing this.
13. I have access to clean clothing every day. You can wash your clothing with cold water; or you can send it out. Most don't like to send it out because it smells like chemicals when it is returned.
14. Bedding is getting washed every other day.
15. Correctional staff do not wear face masks regularly and nobody wears gloves. Nurses are not wearing masks.
16. Correctional staff move within the same building between two pods. Nurses move from building to building within the facility. On July 23, 2020, staff from all over Deerfield came to our pod for a shakedown. This took about four hours during which we had to stay outside while the staff looked through all of our stuff.
17. I estimate approximately forty individuals were moved from Deerfield within the last month or so. I do not know for certain but they may have been moved to St. Bride's.
18. I believe I am eligible for early release. On May 12, 2020, I along with others, did what we were instructed to do which was fill out a form regarding early release. I was not eligible at that time, but would be eligible on May 19, 2020. However, I was then told that I could not resubmit the early release request until a new executive order came out. On June 1, 2020 I resubmitted but I have heard nothing on this.
19. I am very concerned about my health and the health of everyone here. I am concerned because staff do not wear masks. I am concerned because of my lack of access to hand sanitizers and inability to socially distance. I have been in the re-entry program for two and a half years and have met all the requirements. I have serious, chronic underlying medical conditions: high blood pressure and high cholesterol.

I, Kathleen Larkin, reviewed this agreement with [REDACTED] and received his verbal assent to all of its terms on August 5, 2020 at approximately 2pm via telephone call while he was incarcerated at Deerfield Correctional Facility.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

8/5/20