

**DECLARATION OF [REDACTED]**

I, [REDACTED], certify under penalty of perjury that the following statement is true and correct pursuant to 28 U.S.C. § 1746.

1. My name is [REDACTED]. I am [REDACTED]

years old. I am currently incarcerated at

Central Detention Facility

in Washington, D.C., in the [REDACTED] unit. I have been at this facility since

[REDACTED]



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2. I suffer from asthma. I carry an inhaler. I have an asthma attack about once a week.
3. The first time I heard about coronavirus was on the news in January.
4. No one from DOC has ever met with me or my unit to discuss coronavirus or COVID with me or any other residents.
5. No one from Unity Health has ever met with me or my unit to discuss COVID with me or any other residents.
6. An inmate on my unit was locked into his cell 73 cell about 2 days ago. He was quarantined. The staff did not tell us anything. I learned this from another inmate. He was suspected of having coronavirus. I do not know if medical saw him. I do not know if he went to the infirmary. I never saw anyone go into his cell to provide medical care.
7. There are at least 5 people on my unit who are coughing frequently. No one from the staff approaches them when they

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cough to ask them to cover their mouths or to offer medical care.

8. When I use the phone to call my loved ones, I have to stand right next to other inmates, including inmates who are coughing.
9. The phones we use are not cleaned or sanitized between each use.
10. There is a backup at the infirmary so that it will take time to be seen.
11. If I put in a sick call slip, I will not be seen by sick call for 2-3 days.
12. I work in the kitchen. I have seen others who work in the kitchen complain of being sick and ask to go to the infirmary. One of the kitchen staff was coughing. Another inmate in the kitchen was sick with flu like symptoms. Neither of them were seen by sick call or the infirmary. Both inmates kept working in the kitchen while sick.
13. If I tell a CO that I am too sick to go to work, I am told to go to work anyway. The only way to get out of

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work for illness if if the Infirmary or sick call gives you a slip. But since we can't get to the infirmary or sick call the day we begin to feel sick, we are forced to work sick or we face punishment.

14. Kitchen workers' declarations of being sick are ignored. Inmates are working in the kitchen today who are coughing. Inmates are working in the kitchen today who have told CDS that they have diarrhea.
15. We are now making food in the CDF kitchen for both CDF and CTF.
16. In the kitchen we get hairnets and Beard guards and gloves. We do not get masks. We wear white clothes. We get back different ones every day. Sometimes they don't seem like they have been washed between shifts because when we ~~get~~ to put them on there are dirty clothes and old hairnets in the bin we get the white kitchen clothes out of.
17. The CDS told me that they get their temperatures taken on the way into the building. They did not say whether they have to take surveys. If you pass the survey you get

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a green or pink dot sticker to put on your badge. I have seen people inside the facility without a dot sticker on their badges every day since that procedure started.

18. Once new inmates are assigned to a permanent housing unit, if they later get reassigned to detail, they move to our unit <sup>no quarantining</sup> to see whether they have gotten sick since entering the jail.
19. There are signs up in our unit that describe COVID-19. The signs do not tell us what the symptoms are. The signs tell us not to spread misinformation about COVID, but the signs do not give us the correct information we should know.
20. There are signs up in the unit with the light hearted slogan "keep calm and Wash your hands." I feel that the signs trivialize what is going on.
21. Staff assume that we get information about COVID from the news or from family phone calls. People whose red time is not during the news or who don't talk to family wouldn't be able to find out if corona



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has gone airborne or mutated or could otherwise hurt us in some new way.

22. When we travel from our unit to work, we are packed to people into an elevator about 6 feet by 6 feet wide.
23. When inmates or staff bring food trays to the units, the inmates are not wearing masks. Some Staff do not wear gloves.
24. The staff do not have access to masks. Some of them wear homemade masks they bring from home. One staff member on a unit (I think it was South 1) was wearing a red bandana over his face ~~today~~ The white shirts, only some wear masks.
25. When inmates exhibit symptoms they are not being taken seriously or given treatment promptly.
26. I filed a complaint on March 29, 2020, about un-screened inmates being transferred to my unit. On April 1, 2020, the grievance was returned to me with no response. I spoke to [REDACTED] on <sup>APPROX. MAR 28TH</sup> April 1. [REDACTED] told me that they will not stop transferring inmates between units.

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There is no reason to stop transferring inmates, [REDACTED] said, because medical has not given us a reason to stop transferring inmates between units.

27. Video visitation still takes place. Loved ones come to the video visiting center. The DOC Staff member who works in the video visiting center to screen loved ones making a visit came in person to my unit about two weeks ago. He was not wearing gloves or a mask.
28. Inmates, not DOC staff, clean common areas of housing units. Inmates clean a few times a day, raising the same dirty rags each time they clean. The rags are ~~changed~~<sup>new</sup> laid on a rail to dry at the end of each day as though they are to be utilized the next day.
29. The cleaning solution is refilled by the detail workers. The DOC staffer who refills the bottles left yesterday before the cleaning inmates could refill the bottles from the large jug he brought to refill, and so many of the cleaners had no cleaning solution yesterday.

30. I have never heard an announcement advising people to clean. I have not heard such an announcement either in person or over the PA system telling people to clean.
31. No one inspects the inmates work after they clean to see if the areas are clean.
32. There is a closet of cleaning supplies on my unit meant for inmates to use to clean their cells. That closet is kept locked. Cbs frequently deny access to the closet when an inmate asks for cleaning supplies. I saw someone ask for cleaning supplies and get denied yesterday.
33. We have sinks in our cells. There is no communal sink to wash hands. When we are having communal rec time. I cannot wash my hands after playing chess or using the phones without sacrificing the remainder of my rec time. The doors to the cells are opened every hour on the hour, so if I ask to wash my hands I am told to wait until the hour mark during rec time.
34. My sink has warm and cold water. It does not get hot.
35. We get one roll of toilet paper per week. It is not enough for a week.



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Laundry is once per week, but there are no laundry bags, so you can't wash your clothes if you can't find one or didn't get one when you came in. It has been months since new inmates got laundry bags.

37. If you are at work when the laundry service comes around, there is no way to get your clothes laundered.

38. Inmates wash clothes in their sinks and toilets. They do that because the laundry service often gives people staph infections because clothes do not come back clean. I get pimples that I was told were a staph infection when I use the laundry in the jail.

39. I have never seen professional cleaners who were not inmates cleaning.

40. The cleaning supplies are watered down. I was on the programming unit at CTF [REDACTED]

[REDACTED] One of our chores was to water down the cleaning solution for my unit, 25% cleaner, 75% water.

41. ~~Not~~ I have no access to hand sanitizer. There is hand sanitizer in the kitchen but nowhere else at CDF. At CTF, the hand sanitizer dispensers were filled with surface cleaner like Orange Glo, instead of with sanitizer.

[REDACTED]

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42. Inmates need more guidance in ~~good's~~ <sup>meals</sup> ~~meals~~ contamination such as dirty mop and dirty water ~~for~~ <sup>not</sup> that is used throughout the unit.

43. I know about social distancing from the news. No staff or anyone who works at DDC has ever told me about it. It's laughable to talk about it here because its impossible here.

44. In the kitchen, I am only a few inches from other inmate kitchen staff.

45. When the CTF kitchen closed, the CTF kitchen staff were brought over to work at the CDF kitchen. Many of those staff are sick or coughing. I move my work station in the kitchen to try to avoid being near kitchen staff from CTF.

46. DDC assumes that we know what is going on, but we have little information about this illness.

54 47. When we have rec on modified schedules, the unit is not adequately cleaned between rec shifts.

55. Some cleaners volunteer in the kitchen and then do not clean.

49. I do not believe that DOC knows that people can be asymptomatic carriers. I learned about asymptomatic carriers only from phone calls with loved ones. I think DOC does not know because they act like if someone isn't obviously sick there is no risk.

50. No one tells us what is going on. The signs do not tell us. If I were in lockdown and had lost TV or phone privileges I would have no idea what corona is.

51. People on my <sup>unit</sup> still give each other high fives. People still eat and drink each other's food and beverage bottles. Staff do not warn people these things are unsafe.

52. The kiosk that we order commissary from is almost never cleaned. It was visibly dirty with fingerprints when I saw it earlier today.

53. No one has told us not to lick our fingers.

54. Other inmates cough on me or in my vicinity.

55. Four of the ~~contract~~ staff from Summit in the kitchen have coughs. They continue to come to work. They have been sick ten days. I saw all four of them in the



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kitchen today.

56. I think I'm going to die. Because I am asthmatic, I believe I am going to contract COVID, and that I will receive grossly inadequate medical care. I am very scared that I am going to die within just a few months of my release date.
57. I am concerned that the CCR will stop coming to work because they don't get the proper equipment to feel safe being around us.
58. I know that CDC guidelines say we should stay 6 feet apart and there shouldn't be gatherings of 10 or more people. Those guidelines are not followed. They are putting my health and safety at risk.
59. They will lock us down and isolate people for punishment but they are not properly isolating people who have symptoms even though they clearly know how to.
60. I believe I could die in jail. I've been in jail [REDACTED] months and I just want to go home alive. I fear that I will not live to see my [REDACTED] release date.

[REDACTED]  
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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed on the 17<sup>th</sup> day of April 2020, in Washington, D.C.

[Redacted]  
\_\_\_\_\_  
Central Detention Facility  
1901 D Street SE  
Washington, DC 20003

~~Correctional Treatment Facility~~  
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