

DECLARATION OF KEON JACKSON

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

1. My name is Keon Jackson. I am 36 years old. I am currently incarcerated at the Correctional Treatment Facility in Washington, D.C. I am in the RSAT unit. I got on this unit on February 25, 2020.
2. Our unit has a television and the men on our unit regularly watch the news. We see the situation that is unfolding and we are afraid. We do not think CTF and the Department of Corrections is taking coronavirus seriously. In fact, I know that they are not taking it seriously, because when I and other inmates raise our concerns about the virus, the counselors on our unit tell us that we should stop watching the news. The counselors say that the media is blowing the virus out of proportion.
3. Our unit has "group" sessions every day, usually four times a day for around an hour to an hour and a half. In these group sessions, all of the men on the unit come out of our cells and sit in a circle. We sit in plastic chairs in a big group of around 30 people. In these groups, we have to sit less than a foot apart.
4. I have seen on the news that President Trump and health officials have said that people should not gather in groups of more than 10 people and that we should be six feet apart.
5. Several times I have raised the guidance about not gathering in groups larger than 10 and staying six feet apart with DOC staff and they told me I was hyping this up and told me to stop watching the news.
6. As of March 24, 2020, our unit was still meeting in this large group.
7. In the group sessions that we have every day for several hours, we have many people from outside CTF coming every day. Around five to six people a day come from the outside, including clinicians, people from Narcotics Anonymous, other people who lead programs. These outside participants bring their own pens and papers. In our group sessions, we have to pass these pens and papers around, so that by the end of a session, around 30 men have touched these objects.
8. On March 16, 2020, I was in the RSAT unit and there were several people from outside CTF, like clinicians and programming staff, who had entered the unit. Then I heard an announcement over the CTF loudspeaker asking everyone who had entered the CTF that morning to come back down to security for coronavirus screening. CTF had already let in people from outside the facility into our unit before screening them.
9. I have also seen on the news that people should be washing their hands regularly. On the RSAT unit, we have sinks in our individual cells. As of around March 21, 2020, CTF




officers started locking our cells during group sessions. There is no sink in the RSAT unit common area, so for several hours a day, we are unable to wash our hands.

10. CTF also has not given us the soap or cleaning products we need. March 21st, was the first time CTF gave me a free bar of soap, and I have been on my unit since February 25th. If you can't afford to buy soap at the commissary, you don't have any soap except for the single bar they gave us on March 21st.
11. When I came on the unit in February 25, 2020, there was a hand sanitizer dispenser on the wall that inmates in the RSAT unit could use. Recently though, CTF officials took the dispenser off of the wall and placed it behind glass so that only officers could use hand sanitizer.
12. My unit has also been giving us cleaning supplies but they are watered down. My unit has also been using the same old mops for months and they are molding and stinking up the unit.
13. CTF has not been cleaning the showers any more frequently. They have cleaned the showers in my unit once or twice since I have been on the unit for a month.
14. I am especially worried about my safety at CTF. [REDACTED]
15. Because I am worried about my safety, I filed an emergency grievance with Director Quincy Booth on March 24, 2020. I want CTF and the Department of Corrections to take the threat the virus poses to us seriously and to do everything they can to keep us safe.

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 25th day of March 2020, in Washington, D.C.



Keon Jackson
Correctional Treatment Facility
1901 E Street SE
Washington, DC 20003