

EXHIBIT D

Declarations of 12 Current or Recent Detainees

INDEX OF DETAINEE DECLARATIONS

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EXHIBIT D-1

Declaration of Rhonda Jones

DECLARATION OF RHONDA JONES (R.J.)

I, Rhonda Jones (R.J.), being competent to make this declaration and having personal knowledge of the matters stated herein, declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age. The statements contained in this declaration are based on my personal knowledge and are true and correct. I am aware that they will be used in a court of law.
2. I am a 58-year-old woman incarcerated at the Clayton County Jail in Jonesboro, Georgia. My inmate number is 2124969. I have been here since April 9, 2020.
3. I have had a lot of health problems in recent years. I have been hospitalized for pneumonia twice in the past 8 months. I was hospitalized for 3 days in February 2020 and for 7 days in October 2019. I also have chronic obstructive pulmonary disease (COPD) and hepatitis C. My health status puts me at special risk for a bad outcome if I get sick with the coronavirus.
4. I have not received any information about Covid-19 and its symptoms from either the jail or the medical staff. There are no signs in the jail telling us what we should be doing to protect ourselves.

5. I am currently assigned to Housing Unit 3, Pod 3. I think that there are about 40 women in the pod where I live. We sleep in cells with metal doors. There is a common area in the pod with tables, showers, phones, and an electronic kiosk.

6. Each cell is designed for two people and has two bunks. However, there are three people in my cell. Two women sleep on the bunk bed. I sleep on the floor on a thin mattress.

7. We stay in our cells for about 22 or 23 hours per day on most days. At most, we get about an hour of out-of-cell time, called "free time," in the morning, and another hour later in the day. During free time, people come out to shower, use telephones, sit at tables, or use the kiosk. About 12-15 women are let out for free time at once. After one group of people returns to their cells at the end of free time, the next group comes out for free time.

8. Even though free time is limited to 12-15 people at a time, many more people congregate for other activities. For example, everyone comes out at once and lines up for their afternoon meal trays; people just line up like normal, with only a foot or two between us. Similarly, for pill call, which is twice per day, the officer pops all of our cell door locks. At that time, almost everyone comes out in a big crowd. People who take medication line up to get it from the nurse, with

only a foot or two between each person. Also, as I noted above, we spend most of our time in our cells with three people in the cell; there is no way for everyone in the cell to stay six feet apart consistently.

9. We are also together in large groups when we go to the medical unit. I go to the medical unit three times per week to have my blood drawn and my blood pressure checked. When I go to the medical unit, I wait in a crowded cage with up to about 20 other women. Some people wear masks; some do not. There is not enough space for us to stay six feet apart. We wait in the cage until our names are called.

10. To my knowledge, the jail has not taken steps to improve sanitation here due to the coronavirus. Many people use the same telephones, showers, tables, and kiosk, without those items being sanitized between uses.

11. We are not given what we need to keep our cells clean enough to protect us from getting sick. The only cleaning supplies provided regularly by the jail are a broom and a dirty mop that is passed from cell to cell. Occasionally, we are given a small amount of cleaning spray; however, it is not nearly enough. One day a couple weeks ago, a trustee came around with a cleaner in a spray bottle. She sprayed a tiny quantity of cleaner in my sink, a half-teaspoon at most. Then she moved on to the next cell.

12. Plumbing is a problem at this jail. In my cell, toilet water leaks out of the toilet fixture onto the floor. I would estimate that about a gallon of toilet water is on the floor at any one time. It has a putrid odor. I put blankets at the base of the toilet to sop up the water. The leaking toilet has been a consistent problem since I arrived in the jail. I filed a grievance about the toilet water on my cell floor at some point before May 7 (I do not recall the exact date) but I never received a response. There are puddles of water in the common area too, where water has leaked out from people's in-cell toilets. You have to step over puddles to get to the phones.

13. The jail only issues one jumpsuit, one pair of rubber shoes, one towel and washcloth, and bedding. People do not get underwear or bras unless they have money to buy them from the jail store. For about the first 6 weeks of my incarceration, I didn't have underwear or a bra.

14. I am one of the few people in my pod who has a mask to help reduce the spread of coronavirus. Most of the people in my pod still do not have real masks. Instead, people use various things to cover their faces, like towels, ripped-up underwear, and pieces of sheets. Just a few days ago, a few more women in my dorm got masks from the medical staff at my urging. While in the medical unit, I saw what looked like a full box of masks on a nurse's desk. This surprised me

because, for the last two months, almost no detainees have had masks, even if they are elderly or sick. I asked the nurse if she could give masks to some of the detainees too. After that, the nurse handed out a few masks to other detainees.

15. I am extremely concerned about my risk of catching coronavirus at this jail, and I have tried to file a grievance about the things the jail is failing to do to protect us.

16. The grievance procedure was not explained to me at orientation. No one gave me an inmate handbook or other document explaining the grievance procedure. I know that I can submit a grievance on the kiosk, and I have tried to do so, but I do not know what rules apply, if any.

17. I have filed about six grievances since I've been at this jail, including the one discussed above about standing toilet water in my cell.

18. I have never received a response to any of my grievances.

19. On previous occasions, after I have submitted a grievance on the kiosk, the kiosk listed the grievance as "pending." At some point, for reasons that are totally unclear to me, the "pending" indicator was changed to "resolved." I do not know how the grievances are "resolved" since I never received any response to them.

20. At the moment, I cannot file any new grievances because I am at my

grievance limit. I know this because when I have tried to file a grievance about the jail's failure to protect people from the coronavirus, a message appears on the screen telling me that I have reached my grievance limit. To my knowledge, there is no way for me to withdraw my already-filed grievances so that I can file a new grievance.

21. I even asked an officer if I could file a paper grievance instead of filing a grievance through the kiosk. She said that I could not. The jail does not accept paper grievances from inmates. Grievances must be submitted in the kiosk, the officer told me.

22. If I could, I would file a grievance about the jail's failure to protect me and others in the jail from Covid-19. I have a history of serious respiratory illness and I often have trouble breathing as it is. I am scared that I could get sick and die from the coronavirus in this jail.

I swear under penalty of perjury that the information given herein is true and correct, and I understand that a false answer to any item may result in a charge of false swearing.

Sworn by me this 21 day of June, 2020.

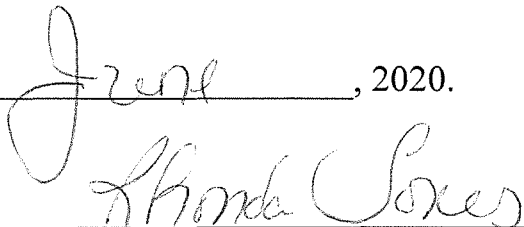

Rhonda Jones (R.J.)

EXHIBIT D-2

Declaration of Randolph Mitchell

DECLARATION OF RANDOLPH MITCHELL

I, Randolph Mitchell being competent to make this declaration and having personal knowledge of the matters stated herein, declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age. The statements contained in this declaration are based on my personal knowledge and are true and correct. I am aware that they will be used in a court of law.

2. **Background.** I am 72 years old. I have been common-law married for about 25 years and I have two adult children and two adult stepchildren. I worked for about 15 years for the Ford Motor Company in Hapeville, Georgia. I am now mostly retired, but I do some lawn care and yard work to earn enough of a living.

3. I am incarcerated in the Clayton County Jail in Jonesboro, Georgia. I have served about 10 months out of a 12-month sentence for misdemeanor simple battery. I was booked into the jail on August 9, 2019. I have been here ever since. I am in Housing Unit 5, Cell 504.

4. **My Cell.** I sleep in a small cell with a metal door. The cell has two bunks, but there are three people in my cell. I sleep in the bottom bunk. Another man sleeps in the top bunk about three feet away from me. A third man sleeps on

the floor with his head near the toilet.

5. **Out-of-Cell Time.** We are required to stay inside of our cells for most of the day. We used to get about two hours out of our cells per day. Recently, we are locked in our cells for about 23 hours per day or more. There are some days on which I am not let out of my cell at all.

6. When we have out-of-cell time, officers let people out in groups of about 12 men at a time. People are in a hurry to use the phones, showers, toilet, and the kiosk during the limited time we get out of our cells. The surfaces of phones, showers, toilets, and kiosks are not cleaned between uses.

7. There are certain times during the day when it is not possible to keep “socially distant” from one another. One of those times is when we are waiting in the pill call line. Officers pop the doors to our cells all at once and everyone who takes medicine is instructed to form a long, single-person line. People stand like they usually do in lines, with each person about 18 inches from the person in front and behind him. Another example is when we are waiting in line for our meal trays. For our afternoon meal, we wait in a long line to get our trays and then take them back to our cells. There is no social distancing in the meal tray line either. The other place where there is no social distancing is in the medical unit’s waiting room. We all sit in chairs in a waiting room, and sometimes there are a lot of

people there waiting together.

8. **Yard.** We never go to the outside yard. Although I have seen that there is a covered, outside yard with a basketball court, I have never been there. I have not been taken out for fresh air to the covered yard even one time during my ten months in jail.

9. **Cleaning.** We clean our cell the best we can using a mop bucket that is brought around infrequently. To give an example, on one recent morning, an inmate worker gave us a mop bucket with dirty-looking water, but no mop in it. If there was cleaning product in it, I could not tell. We poured some of the water into the sink and used toilet paper to wipe it around the sink basin and knob. We also wiped the door handle and other surfaces with toilet paper.

10. We are not given sponges or rags for cleaning. Sometimes we use our towels or bits of our clothes as rags for cell-cleaning. But we only have one towel and it is rarely laundered. (Just last week, my towel was laundered for the first time in about four months). If I use my towel to clean the cell, then I can't use that towel for anything else, like drying off after a shower.

11. **Laundry and Hygiene.** We have problems getting clean laundry. Sometimes our sheets are taken to be laundered, but they don't come back from the laundry for a week or two. For that time, we have no sheets and sleep on our

plastic mats. As noted above, our towels are rarely laundered. We are told to wash our towels in the shower, but we don't have enough soap to do that.

12. The jail does not provide a way for people to regularly shave or get haircuts. I had one haircut since being at the jail. That was last summer. My hair and beard are getting very long.

13. **Medical Problems and Concerns.** I have not been feeling well since about the middle of May. On May 15, a friend helped me submit a request to see the doctor on the kiosk. Nothing happened. On about May 19, I again put in a medical request to see the doctor.

14. On or around May 23, I was finally called to the medical unit. By that time, I was short of breath and had headaches. I also had a pain in my side and my stomach was cramping and upset.

15. In the waiting room, where we wait to see a nurse, there is no effort to "social distance" people. There were about 12-13 people while I was there. We were sitting side by side in chairs.

16. When I saw the nurse, I told her that I was having trouble breathing and that I had pain in my side. She said that I would be called back to see a doctor. I have not seen a doctor.

17. I recently asked a nurse to be tested for Covid-19. She told me that

they do not test inmates.

18. I take medications for high blood pressure and a problem with my heart. I see a doctor in the free world for my heart condition. I have been told by my doctor that I have a heart murmur and will soon need a pacemaker.

19. **No Masks Provided.** Even though I am 72 years old, and even though there is a Covid-19 outbreak at the jail, no one on the jail staff or medical staff gave me a mask until early June. Before that, I had to buy a homemade mask from another detainee in exchange for two packets of soup. My mask was made of cloth torn from a T-shirt and the elastic from a pair of underwear. The jail gave me a mask one day after I had a legal visit with an attorney and complained that I was having to use a makeshift mask and could not get a real one.

20. About three or four weeks ago, I asked an officer for a real mask because I was worried about catching the coronavirus. She said she could not give me a mask because masks were only for officers and trustees.

21. Because of my age, I am concerned about how sick I might get if I catch the virus. I have about two months left on my misdemeanor sentence. I asked an officer if I could be eligible for “good time.” But the officer said no. I was told I can’t get “good time” because only trustees get it.

22. I have not received any information from the jail staff about Covid-19

or how to protect myself. There are no signs in the dorm about protecting ourselves from Covid-19.

23. No one on the jail staff has ever given me any information that I can recall about how to file a grievance. I never received a copy of the jail's inmate handbook. I do not know for sure the correct way to use the grievance system. In the past, when I need to file a grievance, I asked another detainee for help with the kiosk machine in my dorm. I don't think I have ever received a response to any grievance that was put into the kiosk on my behalf.

24. I recently asked another detainee for help in submitting a grievance about how the jail is not doing what it should to stop the outbreak of coronavirus. The kiosk screen showed that I had "used up" all my grievances and could not file any more.

I swear under penalty of perjury that the information given herein is true and correct, and I understand that a false answer to any item may result in a charge of false swearing.

Sworn by me this 21st day of June, 2020.


Randolph Mitchell

EXHIBIT D-3

**Declaration of
Barry Watkins**

DECLARATION OF BARRY WATKINS (B.W.)

I, Barry Watkins (B.W.), being competent to make this declaration and having personal knowledge of the matters stated herein, declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age. The statements contained in this declaration are based on my personal knowledge and are true and correct. I am aware that they will be used in a court of law.
2. I am a 60-year-old man incarcerated at the Clayton County Jail in Jonesboro, Georgia. I am awaiting trial. My inmate number is 1973257. I have been here since August 31, 2018. My bail is set at \$5,500.
3. I have Type 1 diabetes. Outside of the jail, I manage my diabetes by monitoring my blood sugar and controlling my blood sugar levels through my diet and regular insulin injections.
4. I am currently assigned to Housing Unit 5, Pod 1. The pod has 16 cells. There are eight cells on the ground level and eight more cells on an upper level connected to the ground by stairs and a walkway.
5. Outside of the cells on the ground floor, there is a day area with tables, five telephones spaced about 18 to 24 inches apart, three showers, and a shared bathroom. There is also a kiosk that we use to buy items from commissary and submit sick call requests.

6. To my knowledge, the jail is separated into eight different housing units. Housing units 1, 3, 5, and 7 are on the bottom level of the jail, arranged in a square. Housing units 2, 4, 6, and 8 are upstairs. Each housing unit contains six

pods, *AT LEAST IN THE FOUR UNITS I HAVE PERSONALLY SEEN.*

B.K.
7. In addition to the housing units, there are eight dorms where the trustees and some of the weekenders and work release people are housed. I know this because I walk past these dorms several times a day on my way to and from insulin call in the medical wing.

8. Each cell is around 7 feet by 11 feet and contains a bunk bed, a toilet, and a sink. It only has space for two people, but we have three people in our cell. That is not unusual; on a typical day almost every one of the 16 cells in my dorm has three people in the cell. The third person sleeps on the floor, next to the toilet.

9. When I first arrived at the jail, detainees in the housing units got *Four* ~~two~~ *B.K.* hours a day of out of cell time. Since March, however, we only get about 60 to 90 minutes out of our cells each day.

10. On most days, we are let out once in the morning and once in the afternoon. The officer on duty often lets us out of our cells late and instructs us to return to our cells early. We are let out in groups of four cells at a time. My cell group's out of cell time in the morning is usually cut off early by lunch. There are also many days when the officer on duty only lets us out once. On a typical day, I

spend nearly 23 hours inside my cell.

B.K.C.
11. We have only a small amount of time every day to fit in tasks like showering, using the kiosk, and making telephone calls to our loved ones. During out of cell time there are 12 people hurrying to do the same things. ~~Two~~ ^{THREE} of the five phones do not work, ~~and a third has very poor audio quality, so everyone lines up to use the same two phones.~~ People do not keep six feet of distance between them, particularly when using the showers, phones, or the kiosk.

12. In 21 months at the jail, I have never been allowed out into the “yard.”

B.K.C.
13. We get meals twice a day. The first meal of the day is brought to us in our cells by trustees around ~~5:00~~ ^{4:00} a.m. Around ~~11:00~~ ^{9:30 To} a.m., the jail officer opens our door so that we can exit our cells to receive our second meal. We line up as we were instructed in orientation, in a single-file line, and we wait for our turn to pick up our lunch tray along with a dinner consisting of a sandwich ^{AND POTATO CHIPS} in a bag. There is no way to retrieve your food while maintaining social distancing, and jail staff make no effort to encourage or allow us to maintain distance.

B.K.C.
14. ^{Twice} ~~Once~~ a day, a nurse and a jail officer come into the dorm to distribute medication, also known as “pill call.” Everyone who takes daily medications comes out of their cell and lines up close together in a line. The only way to get your medication is to come into close contact with around 20 other people. *B.K.C.*

15. We have limited access to personal hygiene items. Each week we are

given two rolls of toilet paper, a small tube of toothpaste, and a four-ounce bottle of liquid jail soap. We use jail soap to wash our hands, wash our bodies and hair in the shower, wash our clothes, and clean our cells. Four ounces does not last any of us for the whole week.

X B.K.
16. We do not receive opportunities to cut our hair or shave our beards, ~~unless we are going to court.~~

X B.K.
17. Our clothes are also unclean. I have not received a clean jail-issued jumpsuit in 1 weeks. *Sometimes it takes two weeks to get a jumpsuit.* My underclothes have not been taken to be laundered in over a month.

18. Our sheets are rarely cleaned, and when they are cleaned, we do not receive replacement sheets for long periods of time. My dormmates and I must often sleep directly on our mattresses for over two weeks because we have no sheets. This has happened multiple times in the past three months.

19. The jail rarely launders our towels and wash ~~clothes~~ *cloths*. In the 21 *X B.K.* months I have been at the jail, my towel has never been laundered. Those of us with working toilets wash our towels and underclothes in the toilet.

20. The cells in my dorm are extremely unsanitary. Most cells are dirty with mildew and bits of spilled food from our meal trays. In a number of cells, toilet water leaks onto the floor.

21. I have been in this jail for 21 months. The jail's sanitation has

generally worsened during my time here.

22. In mid-May, after it became known that there was a serious outbreak of coronavirus at the jail, the trustees stopped coming to our dorm and regular detainees were put in charge of cleaning. The regular detainees took it upon themselves to clean more regularly. Specifically, they started mopping more frequently, cleaning out the showers, and wiping down the phones. They still did not have access to bleach or strong cleaning solutions. This uptick in cleaning lasted for a little over two weeks. In late May, the trustees returned to the dorm and the cleaning went back to the way it had been before. I have not observed the jail take any coordinated effort to improve sanitation or hygiene in response to the COVID-19 outbreak.

23. We are unable to sanitize the interiors of our cells. Every week or two, we get passed a mop bucket. The water inside is usually too dirty to use. My understanding is that there is one mop for the entire housing unit. Since hearing about Covid-19, we have occasionally asked the officer on duty for bleach or any chemicals that kill viruses and bacteria, but they never given us anything like that as far as I know.

24. The only thing we can use to clean our cells is our towel or spare bits of toilet paper. If I use my towel to clean, I have to wash it in the toilet and dry it off before my next shower.

25. The common areas are rarely cleaned. Dirt, mold, and mildew have accumulated all over. The telephones, tables, and kiosk are not sanitized consistently, much less between uses.

26. Twice a day, I am allowed out of my cell to go to insulin call with the other diabetics in my dorm. Insulin call is typically held once around 2:00 p.m. or 3:00 p.m. and again around 3:00 a.m. At these times, the officer on duty opens my cell door, and I walk with the other 10 to 15 diabetics in my dorm to the waiting room of the medical wing.

27. In the waiting room, we form a single file line as we wait to be called in to have our blood sugar tested and receive our insulin. The jail does not always release the same number of dorms for insulin call. Some days, the jail officers release two dorms at once, and there will be 20 to 30 people in line. Other days, the officers release more dorms at once, and there are 50 to 75 people lined up within a few feet of one another. The jail has not taken any steps to change the insulin call protocol to better protect us during the COVID-19 pandemic.

28. When I first arrived at the jail, in what the jail calls “orientation,” I was instructed on some of the jail’s many rules. For example, detainees must turn and face the wall any time an officer enters our room, and we have to keep our personal roll of toilet paper with the end folded in a “V” at all times. It is my understanding that the “V” is for the initials of the sheriff, Victor Hill.

29. The officers in the jail are quick to use excessive physical force on detainees when they believe detainees have broken these rules. The Scorpion Response Team, or “SRT,” is responsible for cell inspections and is known for being physically abusive to detainees.

30. One particularly upsetting occasion took place in April 2020. During lunch distribution, the supply of chips ran out halfway through the line. After people received their lunch trays, an officer called one of the tiers of cells back into the lunch line to get a bag of chips. One man, E.N., got in line from the wrong tier. A large SRT officer grabbed him. E.N. did not resist in any way. I watched as the officer taunted him, hit him, and shot him with a taser. The officer then brought E.N. back to his cell. As he entered the cell, the officer told E.N.’s cellmate to get on the ground. The cellmate, K.B., did not get on the ground quickly enough, and the SRT officer used his taser to shoot K.B. in the head.

31. In March, I began hearing about the Covid-19 pandemic from my adult children by telephone. From them and from detainees who more recently entered the jail, I’ve grown to understand that this virus has completely changed the world and killed many people.

32. Officers in the jail have given us no information at all about Covid-19 and its symptoms. The only things I know about Covid-19 I learned from other people in my dorm or from my kids.

33. I am 60 years old and diabetic. I have heard from other people that my age and medical condition make me more vulnerable to Covid-19. I do not know why that is or whether there are things I can do to protect myself.

34. The only piece of information I have received from the jail staff about Covid-19 was when they told me I need to put a towel or sheet over my face in order to go to the jail's medical wing.

35. Until recently, nobody in my dorm had a real mask. I used a makeshift mask made from a pair of boxer briefs.

36. At the end of May, I was given a blue surgical mask. I think it is because I am diabetic. That mask has not been cleaned or replaced.

37. Jail staff do not take our concerns about Covid-19 seriously. About one month ago, I became extremely sick. I had a fever, a cough, diarrhea, and aches all over my body. I could barely move, and I couldn't eat. I relied heavily on my cellmate, A.R., for assistance. I was sick for nearly two weeks, and I still feel as though I am recovering from it. At one point, about 6 or 7 days after I began experiencing symptoms, I asked a nurse for medical assistance. She told me that I did not have a fever and sent me back to my cell. Bill

38. When I was sick, I still had to go to medical twice a day with all the other diabetics and stand in a single file line to get my supply of insulin. This was over a month before the jail handed out masks to the diabetics.

39. Within a week or two, one of my cellmates became sick and started vomiting in our cell. I used the emergency assistance button to call to an officer. Over the intercom, the officer told me that they would not come check on my cellmate “unless he is passed out or bleeding.” Those were the officer’s exact words.

40. I put in a medical request for my cellmate, and after Two days, he was called to the medical unit. He came back within 1 hours/~~minutes~~. When he came back, he told me that the medical staff had taken his temperature. When he didn’t have a fever, they sent him back to his cell without any treatment or guidance of any kind.


41. In mid-May, I asked one of the nurses at insulin call if I could be tested for the coronavirus. I told her that my cellmates and I had all been sick with symptoms related to Covid-19 and that we were concerned we might have the virus. The nurse told me that I couldn’t receive a test if I wasn’t running a fever.

She did not take my temperature to see if I was feverish. ~~To my knowledge,~~ ^{AT THE TIME, I HAD NO} ~~the~~ ^{OF THE} jail ~~has not tested~~ ^{TESTING} anybody in my dorm. ~~NOW, I~~ ^{NOW, I} ~~HE~~ ^{HAVE HEARD THAT SOME} ~~TRANITEES~~ ^{TRANITEES HAVE BEEN TESTED.}

42. I submitted a grievance around May asking the jail for information about Covid-19 and how I can protect myself. I haven’t received a response. That does not surprise me. When I have filed other grievances in the past, they were left pending for months without a response. I do not know of any

BKL
BKL

way to withdraw one of my grievances so I can file another.

43. In the past ²²two months, I have experienced great personal loss. First, I  learned that my wife and the mother of my children had passed away. Then I was told that one of my granddaughters had died in a tragic car accident. I am unable to grieve or process these losses because my mind is occupied by fear of Covid-19.

44. I feel as though the jail treats me and my fellow detainees like our lives are disposable and unworthy of protection just because we were arrested. But our health and safety matters too.

I swear under penalty of perjury that the information given herein is true and correct, and I understand that a false answer to any item may result in a charge of false swearing.

Sworn by me this 21 day of June, 2020.



Barry Watkins (B.W.)

EXHIBIT D-4

**Declaration of
Michael Singleton**

DECLARATION OF MICHAEL SINGLETON

I, Michael Singleton, being competent to make this declaration and having personal knowledge of the matters stated herein, declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age. The statements contained in this declaration are based on my personal knowledge and are true and correct. I am aware that they will be used in a court of law.
2. **Background.** I am 59 years-old. I have been incarcerated in the Clayton County Jail in Jonesboro, Georgia since February 17, 2020. I am presently in Housing Unit 5, Pod 5, Cell 105.
3. **My Cell.** I live in a small cell that contains two beds. There is about three feet of space in between the beds, and the toilet is approximately six feet away from my bed. Normally three detainees sleep in my cell, but currently there are only two. Because my cell is around the corner from the showers, water often seeps in under the door and spreads across the floor of my cell. As a result, the floor is frequently wet and moldy, despite how often we clean it. My roommate and I use our blankets, towels, and facecloths to soak up the water and get rid of the mold because officers won't provide us with other cleaning materials.
4. **Social Distancing Concerns.** Officers open our cells at the same

time and place us in single file line in order to receive our second meal of the day. This meal tray line consists of about 15-20 detainees, and the officers impose no social distancing. When we are released for free time, which is at most twice a day for one hour, everyone rushes to use the shower, phones, and kiosk. This means that roughly 15-20 detainees are attempting to use common areas at the same time. We have three working phones, with about two feet of space between each one. Officers do not impose social distancing during these times, nor do they provide us with masks. Common areas, kiosks, and phones are not cleaned or wiped down in between uses.

5. **Yard.** In the four months I've been in jail, officers have only allowed us to go outside in the yard once, on May 22. However, because I was on a legal call, and our access to the kiosk, shower and phone is so limited, I didn't go outside that day.

6. **Laundry and Hygiene.** There are two working showers in my housing unit that we can access during the times we are let out. We are given no supplies to clean them and it's been months since officers assigned anyone else to clean. The jail does not provide detainees with enough bodywash soap. I get one bottle every Wednesday, and have to use it to clean myself, my towels, my facecloths, and the moldy floor. I have had the same towel for the four months that

I've been in jail. Staff workers have never taken it to be cleaned, which is why I have to use bodywash soap to clean it myself. My bed linens were taken to be laundered on May 10, and I just got them back the week of June 22. So, for 6 weeks, I had to sleep on an old, bare mattress. I have not been provided cleaning products other than bodywash since at least March 2020.

7. **Medical Problems and Concerns.** I have high blood pressure, but do not receive medication to treat it because I cannot afford it. I was in a car accident prior to being incarcerated, which resulted in ligament damage and a fractured hand. Lately, I've been experiencing bad headaches. On May 20 and 21 I requested to see a nurse, and although I got aspirin the next day, I did not see a doctor until mid-June. At that visit, the doctor drew my blood. I still have not gotten medical care to address the original reason for my medical request – which was extreme pain in my fractured hand.

8. **Masks and COVID-19 Protection.** Only new detainees are receiving masks. The rest of us are forced to make our own masks. I constructed mine out of a piece of torn bedsheet. I clean it with the jail-issued bodywash. Officers do not provide masks or gloves to detainees who serve us food.

9. I have spoken with some of the new detainees. They informed me that the only thing the jail did at intake was to take their temperature and hold them in a

sperate housing unit between 3 and 7 days before placing them in the general population.

10. I have not been tested for COVID-19, nor have I had my temperature taken at the jail, even though I had cold-like symptoms during the third week of May 2020. That same week, I requested to be tested for COVID-19, but I was not tested.

11. **COVID-19 Information.** I have not received any information from the jail staff about COVID-19, or how to protect myself. On April 20, I was taken to a judge for sentencing and put at risk of infection because I had to wait in a holding cell with around 25 other detainees, where only a handful of people – 6 or 7 of new detainees – had masks.

12. **Officer Violence.** The jail is known as being a “hands-on” and violent jail. Last month when a detainee tried to get a second bag of chips from the meal tray line, I watched as an officer beat him up and tased him, clearly using excessive force.

13. **Grievances and the Kiosk.** I filed a grievance on or around May 15 about the jail's lack of disinfectant and cleaning supplies, as well as their failure to provide detainees with masks, and I referenced the virus. I also filed a grievance on or around May 8 about a different subject. I have not received a response to either

grievance. At the end of May, I submitted an appeal on the kiosk, asking why the two grievances from May 8 and May 15 were not answered. I did not get a response to my appeal, but I saw on the kiosk that this appeal had been closed out on June 4. I don't know what that means. Sometimes, officers block detainees from using the kiosk, which means they cannot submit medical requests.

I swear under penalty of perjury that the information given herein is true and correct, and I understand that a false answer to any item may result in a charge of false swearing.

Sworn by me this 24th day of June, 2020.

s/Michael Singleton

Michael Singleton (signed with
express permission)

EXHIBIT D-5

Declaration of M.B.

DECLARATION OF M [REDACTED] B [REDACTED]

I, M [REDACTED] B [REDACTED] being competent to make this declaration and having personal knowledge of the matters stated herein, declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age. The statements contained in this declaration are based on my personal knowledge and are true and correct. I am aware that they will be used in a court of law.

2. **Background.** I am 52 years old. I am incarcerated in the Clayton County Jail in Jonesboro, Georgia. I was booked into the jail on May 17, 2019. I have been here ever since. I am in Housing Unit 3, Pod 3.

3. **My Cell.** I live in a small cell. The cell has two bunks, but there are three people in my cell. I sleep in the bottom bunk. Another woman sleeps in the top bunk. A third woman sleeps on the floor with her head near the toilet.

4. **Out-of-Cell Time.** We are required to stay in our cells for most of the day. Officers let us out for one hour in the morning and one hour later in the day. On days when the jail is short-staffed, we only get out of our cells for about one hour per day. We are let out in groups of about 10 or 12 women at a time.

5. During out-of-cell time, people hurry to use the phones, the shower, and the kiosk. The phones are very close together. People talk on the phones at

the same time right next to each other. The surfaces of phones, showers, and kiosks are not cleaned between uses.

6. There is no effort by officers or jail staff to keep people “socially distant” from each other during certain times of day. One of those times is when we are waiting in the pill call line. I take medications. Officers open our cell doors all at once. People who need medicine form a line, with each person close to the person in front of and behind her. Another example is when we are waiting in line for our meal trays. For our afternoon meal, we wait in a long line to get our trays and go back to our cells to eat. There is no social distancing in the meal tray line. The other place where there is no social distancing is in the medical unit’s waiting room. We all sit in chairs in a room, and sometimes there are a lot of people there waiting together.

7. **Plumbing.** There are plumbing problems at this jail. In many cells, the toilets don’t flush and waste builds up in the bowls. In my own cell, the sink water smells like feces and contains visible, black particles that settle in the bottom of a cup. For those reasons, I avoid drinking the water from my cell’s sink.

8. There are also puddles on the floor of the dorm. Twice, I have slipped and fallen on a foul-smelling puddle that leaks out of a closet and pools near the entrance to my cell. The first time was in December 2019. The second time was

in May 2020. That last time, I believe I pinched a nerve and I was in pain.

9. **Yard.** We never get taken to the outside yard for fresh air and exercise. I have been taken outside to the yard only one time in over a year. On that occasion, officers had sprayed mace in the dorm and later took us out because of the fumes. That was last summer.

10. **Cleaning.** For cleaning out cells, a bucket and mop are circulated from cell to cell on weekday mornings. Never on weekends. Sometimes we get paper towels to clean in-cell surfaces. Often, there are no paper towels and we have to use toilet paper instead (if we haven any left, which we often don't).

11. **Laundry and Hygiene.** We have problems getting clean laundry. I have been wearing the same dirty jumpsuit for a month. I am able to buy my undergarments from the jail store. But some women don't have money and can't. The jumpsuits we get are old and stained with other women's sweat and menstrual blood.

12. **Medical Problems and Concerns.** I have had a lot of health problems in recent years. From about 2013 until 2016, I received treatment (including chemotherapy) for breast cancer. Before I got arrested, I was under the care of doctors at Southern Regional Medical Center in Riverdale, Georgia. My condition is supposed to be monitored regularly, but that has not been happening

while I've been incarcerated. I also have a thyroid condition for which I take medication. I believe I have been receiving the wrong dose of thyroid medication.

13. **Masks.** I recently asked an officer for a mask to protect me from the coronavirus. The officer said no. So I tie a scrap of old, ripped underwear around my face as a makeshift mask.

14. I have not been tested for the coronavirus at the jail.

15. I am scared to death of getting the coronavirus. I worry that the coronavirus could make me very sick due to my health status and age.

16. I have not received any information from the jail staff about coronavirus or how to protect myself. There are no signs in the dorm about how we can protect ourselves from the coronavirus.

17. No one on the jail staff has ever given me any information that I can recall about how to file a grievance. I never received a copy of the jail's inmate handbook.

18. I need to see the doctor. My chest feels tight and my body aches. I am having chills, I feel sweaty, and I am having shortness of breath. I worry that I am having symptoms of the coronavirus. But I have not been able to see anyone on the medical staff despite my efforts to ask for care.

19. My kiosk access is "on restriction" right now. This is because I

received a disciplinary report for allegedly being in someone else's room. I have no access to the kiosk at all. I cannot file a grievance or a medical request. This has been the case for weeks. I just checked the kiosk again today, and still I cannot use it either to file a grievance or to request to go to the medical unit.

I swear under penalty of perjury that the information given herein is true and correct, and I understand that a false answer to any item may result in a charge of false swearing.

Sworn by me this 3rd day of June, 2020.

██████████

██████████ (signed with express
permission)

EXHIBIT D-6

Declaration of C.C.

DECLARATION OF [REDACTED] (C.C.)

I, [REDACTED] (C.C.), being competent to make this declaration and having personal knowledge of the matters stated herein, declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age. The statements contained in this declaration are based on my personal knowledge and are true and correct. I am aware that they will be used in a court of law.
2. I am a 57-year-old man incarcerated at the Clayton County Jail in Jonesboro, Georgia. My inmate number is [REDACTED]. I have been here since December 2019. I am awaiting trial on a drug charge. My bond is set at \$75,000. I cannot afford to make bond.
3. My primary health issue is diabetes, for which I take insulin. I also have chronic pain from a car accident where I was run over by a car. From the accident, I now have pins and rods in my leg, and fractured disks in my back.
4. I am currently assigned to Housing Unit 4, Cell 616. This room is a secure cell, otherwise known as “the hole.” I have been quarantined here for 14 days, since June 10.
5. On or around June 10, I was placed in quarantine after one of my two cellmates, T.Q., showed symptoms of COVID-19. All three of us were put in the

same cell, Cell 616 in Housing Unit 4. It looked like the room had not been cleaned for me. The floor had dirt and grime on it, and the toilet bowl had solid black rings around it. My roommates, T.Q. and J.W., and I asked an officer for soap and cleaning supplies to clean the cell ourselves, but we were not given any.

6. Around two days after being placed in quarantine, I was tested for COVID-19. To date, 13 days later, I still do not know the results of my test. For the first eight days of quarantine, I was not allowed to use a phone to talk to my family. They later told me that they were extremely worried about whether I was alright. I was not alright. I was very sick for 4 to 5 days with a fever, body aches, chest pain and congestion, and a headache so intense it felt like a migraine. I never saw a doctor, and I never received any medicine or other medical treatment. I still have headaches.

7. When I was in general population, I was on a sliding scale to determine when I needed insulin. In early June, I saw the jail's healthcare provider, who changed my treatment to insulin injections twice per day, along with oral medication. I have only gotten my insulin injections twice per day for 4 of the 15 days I have been in quarantine. For the remaining 11 days, I have only gotten one insulin injection per day, instead of two I am supposed to get. The last time I got my required two doses of insulin was on June 24, 2020, after I finished a call with

a lawyer. This inconsistent management and treatment of my diabetes has had a significant and negative impact on my blood sugar and on my body, overall.

8. In order to get my insulin in quarantine, I must stick my arm through a small, rectangular cut-out in the door. This cut-out has a metal flap that is pushed from the inside to fold down into a little tray. It is about 12 to 14 inches wide and around 3 inches tall. I have never seen an officer or anyone else clean this metal slot in the door. No officer has ever given me cleaning supplies to clean it. Still, every day I stick my bare arm through this slot in the door and lay it on the metal tray that folds down, while a nurse injects me with the insulin I need to survive.

9. My cellmate, T.Q., and I also receive all our meals through this dirty metal slot in the door.

10. My third cellmate, J.W., was released from quarantine after around 10 days and could return to general population, but my cellmate, T.Q., and I are still in Housing Unit 4, Cell 616 together. Neither of us knows how long we must be here.

11. Prior to my quarantine, I was housed in Housing Unit 5, Pod 5. This is sometimes called the “old man’s dorm.” I believe the cells are 8 feet wide and 10 feet long. The cell doors are metal with a 2-foot-long and 3-inch-wide window. There’s a window in the cell but it’s sandblasted so you can’t see out of it.

12. The conditions of the jail are horrible. Detainee workers conduct some cleaning in the common spaces, like the tables, windows, and door handles. We are responsible for cleaning our own cells, but we are not given any chemicals or disinfectant. I do my best to clean with my personal issued soap.

13. On May 21, 2020, no one in my dorm received soap during the hygiene call. The hygiene call happens once a week and we usually get soap, toothpaste, and toilet paper. This means that most people in my dorm went without soap for a week.

14. When I was not in quarantine, we only got about an hour or less of out-of-cell time each day. Usually, this was in the evenings. Once or twice a week, the officer on duty would let us out in the morning as well. The only other times we would leave our cells were for things like pill calls, insulin, or legal visits.

15. When I was in general population, lunch was between 10 a.m. and 12 p.m., and meals were served outside of the cells. We lined up in a single file line without any social distancing to receive our trays. We then brought the trays back to our cells to eat.

16. Before my quarantine, when I was in Housing Unit 5, Pod 5, I was in a two-bed cell. I had two roommates. When I first arrived at the jail, I was profiled for a bottom bunk because of chronic pain I have from the car accident. I was

supposed to immediately get a bottom bunk, but the first 45 days at the jail I slept on a 2-inch-thick mat on the floor. I then was moved to a top bunk, where it was difficult and painful for me to climb up. I now have a bottom bunk.

17. My cell in Housing Unit 5, Pod 5 would flood and had leakage problems for about six weeks because the toilet did not work. Because of this, my two cellmates and I were forced to urinate in our sink.

18. Sleeping on the floor is a truly miserable experience. Many of the cells flood and the mat does not provide protection from flooding. My roommate in Housing Unit 5, Pod 5 who slept on the floor was moved to another cell because of the leakage. However, the jail tried to put two other men on the floor in the cell. Each time they had to convince the guards to move them to a different cell because of the flooding.

19. I filed a grievance in January because the jail did not provide me with diabetic sacks, which include peanut butter sandwiches and applesauce that help maintain blood sugar levels. I hadn't received these for months.

20. On 5/20/2020, I did not receive my insulin at the usual 2 p.m. time. Instead, I was called out at 3:00 p.m. and didn't receive insulin until 3:30 p.m. At this point, my blood sugar levels were dangerously high, and I had to receive much more insulin than normal. This was the first time I didn't get my insulin at the

normal time and I believe the jail did this purposely to make me miss my legal call. Officer T. Price claimed he had called me out at 2 p.m. for my insulin, but I am sure this is not true.

21. There are no limits on sick calls, but they are rarely answered in a timely manner. I once waited three months to get a tooth pulled after putting in a grievance.

22. Almost no one has face masks to protect them from Covid-19. The only people who get real masks are those at intake. Those of us without masks do our best to protect ourselves using t-shirts, boxers, or towels as masks. I am very worried about my health because the jail does so little to protect prisoners from getting COVID-19.

23. One grievance about my diabetes cleared recently, and I filed a new grievance about Covid-19. On or around May 12, 2020 I grieved that the jail is not following the CDC guidelines and requested that everyone at the jail receive real masks. I received a response about a week later, on or around May 19, 2020, when I had access to a kiosk. The response said something to the effect of “I am unaware of the CDC guidelines and protocols.” It also said that they don’t hand out masks to “inmates.” Around two days later, on or around May 21, 2020, I submitted an appeal. I hand-wrote the appeal, addressed it to the attention of the grievance

officer, Officer Glynn, and gave it to the unit officer. To date, I have not gotten a response to my appeal.

24. I have never seen a detainee handbook, and one is not accessible on the kiosk.

25. I swear under penalty of perjury that the information given herein is true and correct, and I understand that a false answer to any item may result in a charge of false swearing.

Sworn by me this 25th day of June, 2020.

/s/ [REDACTED]
[REDACTED] (C.C.)
(signed with express permission)

EXHIBIT D-7

Declaration of J.H.

DECLARATION OF [REDACTED] (J.H.)

I, [REDACTED] (J.H.), being competent to make this declaration and having personal knowledge of the matters stated herein, declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age. The statements contained in this declaration are based on my personal knowledge and are true and correct. I am aware that they will be used in a court of law.

2. I am 51 years old. I currently reside in Morrow, Georgia with my girlfriend. I currently work as an installer and floorer for Carpets by Leon, a company based out of Morrow, Georgia.

3. I was recently incarcerated at the Clayton County Jail in Jonesboro, Georgia for more than five months. I first entered the jail on or around January 3, 2020 and I was released on or around June 19, 2020. I was held on a \$7,000 bond that I could not afford to pay. I was released after my case was adjudicated on June 18, 2020.

4. I had never been incarcerated at the Clayton County Jail before January 3, 2020.

5. Following my release on June 19, I have been in self-imposed quarantine because I believe I was exposed to COVID-19 at the jail. I have been

experiencing fever, shortness of breath, a sore throat, body aches, and fatigue since at least June 16, 2020. I am awaiting the results of a COVID-19 test from June 22, three days after my release, because I was never tested at the Clayton County Jail despite my several requests in May and June. I specifically recall that I requested a test on or around June 16 at the onset of my current symptoms. I was not tested at that time. I am very worried about infecting my girlfriend and other people in my community.

6. It is my understanding that I am at high risk for COVID-19 complications due to my hypertension.

7. I spent most of my time in the jail in Housing Unit 5, Pod 5. That pod has 16 cells, with eight on the ground level and eight more above.

8. The cells are only about 8 feet by 10 feet. The cell doors are metal with a narrow glass window, approximately 4 inches by 24 inches. Most if not all of the cells in my pod had three men in each cell, even though there are only two bunks. I slept on the top bunk in my cell. A third man slept on a thin plastic mat on the floor with his head less than three feet from the cell's toilet.

9. All of the cells I viewed personally were unhygienic, covered in mold, food waste from meals eaten in-cell, and infested with roaches, spiders, and ants. While I tried to clean my cell as much as possible, we were rarely given the

supplies to do so. Officers brought out a mop bucket filled with dirty water once or twice per month. We did not have any other materials with which to clean our cells except my cellmates' personal towels that they wanted to keep clean for showers. I was never issued a towel or washcloth in my time at the jail. I was not alone in this regard: several other men in my dorm did not have towels or washcloths.

10. I never received bleach or any other chemicals with which to clean my cell during my time at the jail.

11. The toilet in my cell did not work in February or March. To use the bathroom during that time, my cellmates and I had to wait until out-of-cell "free time" to use the shared toilet in the common area. This meant that we had to wait many hours between opportunities to use the "day room" toilet.

12. At least four cells in my pod recently had toilets that flooded and stopped working. Some flooded cells still had a third person sleeping on the floor with nothing but a mat as a buffer from the toilet water on the floor. Other cells had no running water. These plumbing issues often remained unresolved for months.

13. Outside of our cells, there is a "day room" with tables, a kiosk, six phones, and three showers. The phones are only about 18 inches apart. The showers were covered in black mold and were rarely cleaned.

14. On a typical day, there was a single officer stationed in a glass booth overlooking all six pods in my housing unit. This one officer was responsible for monitoring all 96 cells in my housing unit. If each pod was similar to mine, the officer would have to monitor nearly three hundred men. That officer rarely left the booth. A second officer would come to conduct count or to accompany a nurse for daily pill calls.

15. There was no social distancing maintained during pill calls when I received medication for my hypertension. On a typical day, a nurse, accompanied by an officer, brought a pill cart into the pod. Between fifteen and twenty men received medication during pill call. We were all let out of our cells at the same time. We then had to line up single file to receive our medication at the direction of officers and nurses. We were less than two feet from each other. There was no social distancing maintained, nor were we ever instructed by jail staff to space ourselves apart.

16. There was also no social distancing when we received our second meal of the day. For our first meal, between 4:00 a.m. and 5:00 a.m., trustees brought breakfast trays to our cells. Between 10:00 a.m. and noon, however, we exited our cells to retrieve a lunch tray, along with a sandwich and chips for dinner. When we left our cells, we lined up single file, about one foot from each other, to

receive our trays. Half of the cells were let out at a time with approximately twenty-four men waiting close together to receive their meals.

17. My cellmate who slept on the floor, J.K., ate his meals while sitting on the toilet in our cell.

18. To my knowledge, the jail did not change or improve sanitation procedures during my time at the jail. Common areas were filthy, and the “inmate workers” who cleaned these areas told me that they themselves were afraid of getting sick without proper protective equipment. The phones, kiosk, and showers in the “day room” were not cleaned between uses. Our cells only received the little cleaning that we were able to conduct with irregular mop access and our personal soap.

19. The jail did not provide enough toilet paper, soap, and toothpaste. We were each given only one 4 oz. bottle of soap, which we had to make last for a week’s worth of showers, washing our clothes, and cleaning our cell. I ran out of soap every week. There were also weeks in which we did not receive one or more of these hygiene products.

20. During my time at the jail, there was infrequent access to laundry and the turnaround time was unpredictable. When I turned in my sheets for laundry, it often took multiple weeks to receive them back. In the meantime, I had to sleep on

my mattress without any sheets. My jumpsuit was rarely laundered. I often spent weeks wearing the same jumpsuit. As stated earlier, I was never issued a towel or washcloth. After showers, I would just put my often-unclean jumpsuit back on while I was still wet.

21. I did not have access to a haircut or shaving equipment during my time at the jail. As the months progressed, I increasingly felt embarrassed by my unkempt and disheveled appearance.

22. I did not see the sky or feel the sun during the entire time I was in the jail. The jail has a “yard” we can see through a door, but we were not once allowed to use it.

23. We received very little out-of-cell time during my months in the jail. When I first arrived at the jail, we received two hours of “free time” on a typical day. During my last few months in the jail, we often received only one hour or less out of our cells each day. There were even some days when we were not let out of our cells at all.

24. During out-of-cell time, four cells, or about 12 men, were let out at a time. Men in my dorm needed to shower, call their loved ones or lawyers, and use the kiosk before we were called back to our cells. There was always a rush to do these things in the limited time allowed; people would congregate to use showers,

phone, or kiosk. Some men also needed to use the day room toilet if their cell toilet was not working. And those men who didn't have running water in their cells also had to bring back water to their cells to drink. The jail staff did not encourage or require any distancing efforts. The phones and kiosk were rarely cleaned, and they were certainly not cleaned between uses.

25. The jail staff did not give me any information about COVID-19 while I was incarcerated at the jail, beyond indicating that I should make my own mask. I was given no other instructions on how to protect myself, and no information about the virus itself. There were no signs posted and no handouts distributed. I became quite anxious as I began hearing worrying reports from loved ones and other detainees about the COVID-19 pandemic.

26. I created my own mask from boxer shorts, which I used for most of my time in the jail. I received a mask from the medical staff a few weeks prior to my release. However, many men in my dorm still did not have masks when I was released on June 19, 2020.

27. I first realized that there were confirmed cases of COVID-19 in the jail when Officer Campbell told me himself during count that he had tested positive in early May. He further told me that he had experienced "very bad" symptoms. I also heard from a man in my dorm who received a newspaper in the

mail that Clayton County courthouse staff had contracted the virus.

28. From family, friends, other detainees, and limited TV news access, I learned about some of the symptoms of COVID-19, including fever, sore throat, coughing, and breathing trouble.

29. Many of the men in my dorm told me that they were experiencing some or all of these symptoms. Frequently, I could see or hear for myself that this was true during out-of-cell time, pill calls, and mealtimes. I often heard men beating on their cell doors for more than half an hour to get an officer's attention when they started experiencing symptoms. Often, men would give up before an officer arrived to check on the problem.

30. For example, when I began experiencing worsening symptoms on or around June 16, I attempted to seek immediate medical assistance to protect my own health and the health of those in my dorm. As noted above, I was experiencing fever, shortness of breath, body aches, fatigue, and a sore throat. I pressed the emergency button in my cell, but no officer came to check on me. I do not believe that anyone in my cell ever successfully received help using this button. At count, I explained my symptoms to an officer and pleaded with him for medical assistance. He told me to put in a sick call request. Following count, I asked a nurse, Ms. Johnson, for assistance during my daily pill call. She, too, told me to put in a sick

call request. During my next brief period of out-of-cell time, I put in a sick call request at the kiosk, requesting urgent medical care and a COVID-19 test.

31. I did not receive a test or any medical treatment before I was released on June 19. No one called me to the medical unit. In fact, two days later, I attended a “video court” hearing that put more than twenty other detainees and officers at risk for exposure if I did have the virus at that time.

32. On June 18, 2020, one day prior to my release, I was brought out of my cell to await my “video court” hearing. Prior to my hearing, I spent approximately three hours in a waiting room, also known as the “law library.” I had never had access to the law library before that date. In that room, I sat side-by-side and back-to-back with approximately twenty other people in folding chairs. It was not possible to maintain social distance. Only approximately 10 people had real masks. Others had towels or other self-made masks. Three women were visibly pregnant, and one of these women had no mask at all, not even a towel. When it was close to my time to be seen by the judge, I was brought out into a hallway to stand and wait in a single file line. There was no social distancing in the hallway either. From the hallway, I was told to wait in a small “video room” with six other people. I had my video hearing in this small room. After my hearing, I walked by myself back to my cell.

33. Members of the jail's Scorpion Response Team (SRT) were often arbitrarily and needlessly rough with detainees. These officers were responsible for conducting regular, monthly inspections of our cells. Violence from these SRT team officers was a regular occurrence. It appeared to me that the SRT officers intended to cause as much fear in us as possible.

34. I personally witnessed these SRT officers slam compliant detainees into the floor with little provocation, drag handcuffed detainees across the floor of the dorm, spray pepper spray in the faces of my fellow detainees, and punch a detainee in the back of the head with a closed fist. SRT officers used their tasers frequently. They often pulled out their tasers and threatened people for minor instances of perceived "misconduct." For example, SRT officers regularly point their tasers at detainees for moving back to our cells too slowly. This happened to me and my cellmates on multiple occasions. I also witnessed one man get tased when he was already in handcuffs and not doing anything to resist.

35. The stress of my experience at the jail took an enormous toll on me. In five and a half months, I lost thirty pounds. At times, my loved ones told me that I appeared almost unrecognizable.

36. My time in the jail took a toll on my mental health as well. I started experiencing anxiety attacks in January, and approximately once per month

thereafter. These were characterized by rapid breathing, accelerated heart rates, and severe headaches. I had not experienced these anxiety attacks prior to my time at the jail. I have experienced night terrors every night since my release. When I visited a primary care doctor following my release, he prescribed me anxiety medication and referred me to a psychiatrist for further evaluation.

37. I witnessed men completely broken, physically and mentally, by their experiences at the jail. I saw more men cry in my time at the jail than I have throughout my whole life. The combination of isolation, fear of COVID-19, and filthy conditions was very hard to bear.

38. I feared every day that I would not make it out alive to see my girlfriend and my three children. I missed the thirteenth birthday of my youngest son. I remember thinking that I was not going to live to see his fourteenth birthday.

I swear under penalty of perjury that the information given herein is true and correct, and I understand that a false answer to any item may result in a charge of false swearing.

Sworn by me this **25th** day of **June**, 2020.

/s/

(J.H.) (signed with
express permission)

EXHIBIT D-8

Declaration of F.S.

DECLARATION OF [REDACTED] (F.S.)

I, [REDACTED] (F.S.), being competent to make this declaration and having personal knowledge of the matters stated herein, declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age. The statements contained in this declaration are based on my personal knowledge and are true and correct. I am aware that they will be used in a court of law.

2. I am a 27-year-old woman who currently resides in Jonesboro, Georgia with my young children. I was recently incarcerated at the Clayton County Jail in Jonesboro, Georgia for approximately two months on a drug possession charge. I first entered the jail on or around March 6, 2020 and I was released on or around May 7, 2020. I had never been incarcerated at the Clayton County jail before.

3. When I first entered the jail, I spent approximately one week in Housing Unit 2, which is referred to as the "orientation dorm." I slept on the floor in the orientation dorm.

4. I spent most of my time in the jail in Housing Unit 3, Pod 3. I also spent a brief time in Housing Unit 3, Pod 4. Both pods have 16 cells, with eight on the ground level and eight more above.

5. The cells are very small, each about 10 feet by 6 feet. Each cell door is metal, with a narrow three-foot-long window. The cell doors pop open only when the officer presses a button from the officer booth. Outside the cells, there is a common area with several tables, two kiosks, six phones, and three showers. The phones are only approximately one foot apart.

6. On a typical day, there was one officer stationed in a booth overlooking all six pods in my Housing Unit. This one officer was responsible for monitoring all of the nearly three hundred people in my Housing Unit.

7. Each cell is designed for two detainees and has two bedframes set up in a bunkbed formation. However, most if not all of the cells in Housing Unit 3, Pods 3 and 4 held three people during my time at the jail. That means there were 48 people in each pod.

8. In each cell, the third person sleeps on the floor. The person on the ground sleeps on a very thin mattress placed directly on the cell floor.

9. I slept on the floor during the entirety of my time at the jail. I spent time in four different cells in Housing Unit 3, and I slept on the floor in each cell. While I slept, my head was never more than two feet from the toilet.

10. We were fed meals twice per day. Early in the morning, between 4:00 a.m. and 5:00 a.m., we each received a breakfast tray. Between 10:00 a.m. and

noon, we received a lunch tray and a bag with a sandwich in it for dinner. For the second meal, we exited our cells and lined up single file, mere inches from each other, to receive our trays. Half of the dorm was let out at a time. There was no social distancing at all.

11. There was also no social distancing during daily pill calls when I received medication for my depression. All women who received medication were let out of our cells at the same time. Sometimes, we lined up single file, and at other times, we formed a large crowd to wait for pill distribution. We were only inches apart.

12. To my knowledge, the jail took no steps to improve sanitation procedures during my time at the jail. The common areas were cleaned infrequently by inmate workers, who were themselves afraid of getting sick without proper protective equipment. The phones and kiosks in the common areas were not cleaned between uses.

13. We never received bleach or chemicals with which to clean our cells. Once per week, on Mondays, the jail provided one mop and one broom to the whole dorm for cell cleaning. There was always a race to use the mop before the water became dirty and unusable, which happened quickly. Sometimes, inmate workers sprayed our toilets with a cleaning spray. No other parts of our cells were

cleaned.

14. The jail did not provide enough hygiene products. We were given deficient quantities of toilet paper, liquid soap, and toothpaste during weekly hygiene distribution. This included one small bottle of liquid soap, one or two rolls of toilet paper, and a small tube of toothpaste. However, often, one or more of the hygiene products was unavailable. This meant that some weeks no one received their small bottle of soap. The soap distributed during this hygiene call was our only material with which to clean our cells, wash our hands, and use in the shower. We were unable to clean ourselves during the weeks we were not provided soap at hygiene call.

15. The jail did not provide me with feminine hygiene products when I needed them. On the night when I got my period, I asked three officers for help in getting a pad or tampon. Specifically, I asked one officer during his round distributing laundry, one officer during count, and one officer during pill call. All three refused my request and told me that the jail did not have any sanitary napkins to provide, or any additional sanitary products of any kind. I had to place a spare sheet between my legs while I slept. My cellmates did not have any pads to spare. It was uncomfortable and embarrassing to be bleeding through the sheet that night.

16. I asked another officer for help the following morning; I was told

again that there were no sanitary napkins. On multiple occasions, I pressed the button in my cell to ask for a pad, but no one came. I finally beat on my door until an officer came. But I still did not receive a tampon or pad.

17. I did not receive any sanitary napkins or pads until three days after I first requested them, and I only received them then from another detained woman, not from the jail. I was so distraught that my cellmates were able to find another woman in the jail who agreed to provide spare pads for my use.

18. During my time in the jail, we often received only one hour out of our cells each day. We stayed in our cells for 23 hours per day on most days. During “free time,” approximately 12 people were let out of their cells at a time. Many people spent their limited free time using the phones, which are very close together. There was not consistent distance maintained during free time, nor did the officers or jail staff encourage any distancing efforts. In fact, I was not fully aware of the importance of social distancing at the time.

19. During my time at the jail, I began hearing reports from family and friends about the Covid-19 pandemic. While the outside world was taking action to stop the spread of the virus, those of us incarcerated in the jail were not told anything about the disease’s symptoms or how to slow the spread of the virus by the jail staff. All of the information I received about Covid-19 came from my

family, friends, and the rare occasions that the TV was turned on and set to a news station.

20. I began to realize the severity of Covid-19 when some officers stopped showing up to work at the jail. It is my understanding that a number of officers got sick with Covid-19.

21. The only thing we were told to do by the jail staff in response to Covid-19 was to create our own masks by wrapping a towel or other piece of clothing around our faces when we left our cells. I was not issued a mask nor was anyone in my dorm. I used a cut-up sheet as a makeshift mask.

22. From family and friends, I learned about some of the symptoms of Covid-19, including fever, coughing, and breathing trouble.

23. When my cellmate began experiencing some of these symptoms, the jail staff did nothing to protect me or other women in my dorm from infection. In mid-April, my cellmate, C.H., returned from court and began experiencing fever, a sore throat, migraine headaches, achiness, sweating, and vomiting. She looked very sick and required help to do even the smallest tasks. For example, I retrieved her lunch tray during afternoon mealtime and helped her up when she needed to use the bathroom.

24. At one point, C.H. coughed up blood, which made me very afraid for

her safety and my own. I pressed the button for officer assistance, but no one came to check on us. When an officer came by for count, I told her about the alarming symptoms. C.H. was told to put in a sick call request for medical assistance. C.H. was too sick to leave the cell to put in a sick call request at the kiosk, so no sick call request was ever submitted. C.H. slept throughout most of the following days. I tried to fan her with extra clothing and make her as comfortable as possible. As far as I know, C.H. did not receive medical treatment for her illness.

25. Approximately three days after C.H. began experiencing symptoms, I began experiencing pounding headaches, sore throat, chills, and vomiting. I pressed the in-cell button for assistance, but no officer came to our cell. During count, I told an officer about my symptoms, but I, too, was told to put in a sick call request. I put in a sick call request stating my symptoms and requesting urgent medical care, but it was a week before I was seen by a nurse during pill call. At that time, I was given Tylenol, but no other treatment or guidance. I was never brought to medical to receive care of any kind.

26. When I tried to request medical assistance during daily pill calls in the week after I began experiencing symptoms, I was told to submit a sick call request and wait for further care. Thus, I had to wait through a week of symptoms before I saw a nurse for my illness.

27. My cellmate, C.H., and I experienced symptoms for approximately two weeks during which time we were not treated for Covid-19 or isolated from other women in our dorm. I continued to line up single file during mealtimes and pill calls. I was never tested for Covid-19.

28. Officers at the jail were very rough physically with detainees at the jail. At the beginning of each month, at an unknown time and date, officers, who we understood to be a "SRT team," barged into our cells to check for contraband. The officers would scream loudly, regardless of the time of day or night. They would often physically remove us from the cells, even if we weren't resisting. We were aggressively strip searched while officers pushed us up against the walls or pressed us into the floor. Both female and male officers conducted these searches, and I felt terrified during each search.

29. My experience at the jail contributed to a severe depressive episode that required medication for the first time in six years. I was first diagnosed with clinical depression in 2013 after which time I was prescribed medication for approximately one year. I remained off any depression medication for six years until my experience at the jail caused a major depressive episode that once again required the prescription of medication.

30. I also experienced significant anxiety attacks, beginning

approximately two weeks after I entered the jail. I started to have multiple anxiety attacks per week, with rapid breathing and chest pain. These attacks were worse than I had ever experienced in my life. I am still experiencing anxiety attacks more than a month after my time at the jail.

31. I was terrified for my safety throughout the entirety of my time at the Clayton County Jail. The jail was not taking the threat of Covid-19 seriously. I did not believe that the jail cared about my health and well-being. I constantly feared that I would not return to my five young children who depend on me for support. I felt hopeless and heart broken.

I swear under penalty of perjury that the information given herein is true and correct, and I understand that a false answer to any item may result in a charge of false swearing.

Sworn by me this 18 day of June, 2020.


(F.S.) 

EXHIBIT D-9

Declaration of A.W.

DECLARATION OF [REDACTED] (A.W.)

I, [REDACTED] (A.W.), being competent to make this declaration and having personal knowledge of the matters stated herein, declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age. The statements contained in this declaration are based on my personal knowledge and are true and correct. I am aware that they will be used in a court of law.
2. I am a 54-year-old man. I currently live in Decatur, Georgia, with my girlfriend.
3. I was recently incarcerated at the Clayton County Jail in Jonesboro, Georgia. I served a 100-day sentence for a misdemeanor conviction of “Battery Provoke.” I entered the jail on or around March 4, 2020 and I was released on or around June 11, 2020.
4. I spent most of my time at the jail in Housing Unit 5, Pod 1. In the pod, there are eight cells on the ground level and another eight on a second-floor level, which you can get to by going up the stairs to the walkway that connects the upper cells.
5. Outside of the cells, there is a day room with some tables, three showers, five phones, and a kiosk, which is a small computer screen where you can send messages, purchase things from commissary, and submit medical requests.

6. In a typical day in my dorm, we were only given an hour of time outside of our cells. We would be let out in groups of 12 for about 30 minutes in the morning, and about 30 minutes in the afternoon, after the 3 p.m. count. Most days, we spent about 23 hours in our cells.

7. During out of cell time, we all hurried to shower, talk on the phone, and use the kiosk. No one instructed us to physically distance ourselves from one another during these times. There were no signs in the dorm telling us how to protect ourselves from COVID-19, and neither jailers nor medical staff otherwise provided any such information.

8. Each of the 16 cells in my pod was clearly meant to hold two people, but each one had three people inside it. The cells are about 7 feet by 12 feet in size. With three people in it, there was hardly any space to move. There was a single bunk bed where two of the people slept. The third person in each cell had to sleep on the floor.

9. In my cell, Cell 5114, I was the person who slept on the floor. This was particularly uncomfortable because of the lack of hygiene in the cell. The cell was so hot that I could only sleep with my head facing out, toward the cooler air in the day room. However, this alignment meant that my head was less than a foot away from the open toilet. When my cellmates used the toilet during the night, I

would wake up, turn my head in the other direction, and try to ignore what was happening.

10. The toilet leaked in my cell, making sleeping on the floor even worse. I would often wake up to find that the roughly 3-inch-thick mattress I was laying on was soaked with toilet water.

11. Each morning, my cellmates and I attempted to clean up the water in our cell. We would first ask the officer conducting morning count for a spare blanket. Sometimes, the officer would get us one, and we would use the blanket to soak up the water that had leaked onto our cell floor during the night and squeeze it back into the toilet. On days when the officer refused to give us an extra blanket, we waited until the next count, four or five hours later, and made the same request to the new officer on duty. Until we received a blanket, our cell floor was wet.

12. In other cells in the dorm, the toilet did not work at all. In some of those cells, flushing the toilet would cause it to overflow. People in those cells had to wait to use the common area bathroom during out of cell time. Because the officer on duty did not always let us out of our cells as planned, people in my dorm were sometimes unable to use the bathroom for 24 hours or longer.

13. Nearly all of the cells in my dorm were covered in mildew and mold.

14. Our ability as detainees to clean our cells was severely limited by a lack of cleaning supplies. A single mop and bucket were passed around the entire

housing unit. On the rare occasion that it reached our cell, the bucket was full of dirty water. It never appeared to have any soap or bleach in it that I could see or smell. We asked both the trustees and the officers for access to cleaning solutions, such as chemical cleaners or bleach, but they always said no.

15. On or around May 14, I filed a grievance asking the jail for assistance cleaning up the mold in my cell. Within a week, I received a response saying that the jail would send “sanitation” to clean it up. Nobody ever came to clean up the mold or provided us with supplies to do it ourselves.

16. On or around May 27, I filed a second grievance asking why no one from sanitation had ever come to address the issue. When I left the jail, this second mold grievance was still pending, and the mold was still there in my cell.

17. The limited supplies made it difficult to maintain personal hygiene. Each week, we were supposed to be given a small 4 oz. bottle of jail soap, two rolls of toilet paper, and a small tube of toothpaste, but sometimes you would not get your ration of supplies and you had to beg an officer to give you some.

18. The soap was particularly hard to ration for a week, as we needed to use it if we wanted to wash our hands, clean our jail-issued spork, use it to shower, or wash our own towels or clothes. Despite my best efforts, I often used up all my soap within three or four days.

19. For the most part, we detainees had to wash our own garments. In the 100 days I spent at the jail, my towel was never exchanged or cleaned by the jail and my jail-issued uniform was changed roughly every three weeks.

20. Laundry was rarely collected or returned by the jail. I spent about half of my time in jail sleeping directly on the plastic mattress because I had no sheets to use on my bed. That mattress was never cleaned or sanitized. Even when the jail moved someone out of the cell, their old mattress was not sprayed or wiped down by anyone before the staff put a new person in the cell.

21. I did not observe any improvements in cleaning while I was at the jail. The showers had mildew and were cleaned at most every two weeks. The common areas were rarely cleaned by the trustees. The phones and kiosk were rarely wiped off.

22. We received two meals each day. Around 4:00 a.m. an “inmate worker,” or trustee, would push a breakfast tray through our door to each of us. The trustees would bring the trays, sometimes uncovered, up the stairs to the upper level. There, they would place the trays directly on the walkway floor, which was covered in mildew, before taking one or two trays to a cell at a time.

23. Around 10:00 a.m. or 11:00 a.m., we received a lunch tray as well as a bag with a cold sandwich that we were meant to save for dinner. At this meal, the officer in the booth would open all the cell doors and instruct us to line up in a

single file line to get our tray and bag. People lined up as they normally do. There was less than a foot of space between people in line. There was no physical distancing at all.

24. Once a day, a nurse and an officer would enter the dorm to distribute medications at what is known as “pill call.” The officer would yell “pill call, line up!” and we would get in a line to receive our medication. On these occasions physical distancing between people was never mentioned by jail or medical staff and never achieved. I had to attend pill call to receive my hypertension medication, so I had little choice but to get into these lines with other people who also needed medication.

25. Small rule infractions at the jail are met with verbal or even physical abuse.

26. One of the jail’s rules is that the end of every detainee’s roll of toilet paper must always be folded into a “V” shape, even when the roll is inside their personal bin. It is my understanding that the “V” is for Victor, as in Sheriff Victor Hill.

27. A special group of officers, called the “Scorpion Response Team,” or “SRT,” conducted regular security inspections in my dorm. However, instead of focusing on security, these searches ended up focusing on whether a detainee had made their bed correctly or folded their toilet paper into the required “V” shape.

28. The SRT officers terrorized detainees for breaking even minor rules. During one routine search of our dorm, an SRT officer decided that a man in the cell next to mine had not folded the “V” in his toilet paper the right way. The officer called several other SRT members over. Together, they berated the man and “tossed” his cell, taking all of his things—his mattress, sheets, canteen food, and bin full of personal items—and throwing them off the second-floor walkway onto the day room floor below.

29. After taking away his possessions, the SRT team left and the cell door locked behind them. The man could not retrieve his mattress, sheets, and personal items until the next morning. He spent that night sleeping directly on the metal bunk.

30. The jail officers were often unnecessarily rough with detainees. In early April, I watched as a member of the SRT, Officer Wynn, took an older detainee out of the dorm and walked him in the direction of visitation. The older detainee was in handcuffs. Suddenly, Officer Wynn grabbed the man by his shirt, flung him on the floor, and punched the man three or four times. The officer then pulled the man back to his feet and led him away.

31. I was concerned that if I told people about the conditions in the jail, the SRT team would retaliate against me by finding an excuse to beat me up or

give me another charge. I worried about this because I had seen it happen to other people. For this reason, I did not speak up until I left the jail.

32. In late March, I heard from my girlfriend and other family members about the escalating crisis of COVID-19. However, for the next three months, I learned nothing about the virus from any members of the jail or jail medical staff. They didn't give me any informational sheet, make any announcements, or put up any signs.

33. The only time jail staff ever told me anything about the virus occurred when an officer verbally told people in my dorm that we had to put something over our face if we wanted to go to the day room or the medical unit. They did not give us anything to put over our faces.

34. Like many of my dormmates, I attempted to protect myself by taking a bedsheet and wrapping it around my face and my nose. It was uncomfortable and it stank. Other people used towels or underclothes.

35. I was never given a real mask. Nobody in my dorm was given a jail-issued mask until early June, at which point some people began to receive them. On June 11, when I left the jail, several people in my dorm still did not have masks.

36. My family members told me enough about the virus for me to know that I was at risk. They told me that older people and people with pre-existing

conditions were at greater risk if they were infected. This worried me because I am 54 years old and have hypertension that I treat with medication.

37. I observed the jail make almost no changes at all to detainee life during my time there. The only difference I ever saw was that the jail started giving us only an hour of “free time” each day instead of two hours.

38. I saw one of my cellmates, J., treated particularly badly. It’s my understanding that J. had epilepsy, because he had several seizures in the time that we lived next to each other.

39. In April, J. was working out in our cell when he fell to the ground and started shaking against the door. I went to him and laid his body down flat, then turned him on his side so that he wouldn’t swallow his tongue. The emergency assistance button in our cell didn’t work, so my cellmate and I started banging on the door to try to get a jail officer’s attention. It took us 30 minutes to get an officer’s attention and nearly an hour more for staff from the medical unit to arrive with a stretcher.

40. On one day in early May, J. told me he had COVID-19. That same day, he was removed from our pod. All his things—his sheets, blanket, and his personal possessions—were all still there in his cell by his bed, next to us.

41. The next day, an officer came to retrieve J.’s possessions. We asked the officer to be tested for the virus, telling him that if J. had it, we might have it

too. The officer disregarded these requests. Neither he nor anybody else ever cleaned our cell after J. was removed.

42. Later that same day, I was moved to the cell next door. Two new detainees were moved into my and J.'s old cell. One of the men received J.'s old mattress. To my knowledge, that mattress was never cleaned off.

43. In early June, after J. had been gone for over a month, jail staff brought J. back to his cell. J. told me that he had been sent to the ICU at Southern Regional Medical Center, in Riverdale.

44. I was never tested for COVID-19 while I was at the jail.

I swear under penalty of perjury that the information given herein is true and correct, and I understand that a false answer to any item may result in a charge of false swearing.

Sworn by me this 21 day of June, 2020.



(A.W.)

EXHIBIT D-10

Declaration of W.L.M.

DECLARATION OF W [REDACTED] L [REDACTED] M [REDACTED] (W.L.M.)

I, W [REDACTED] L [REDACTED] M [REDACTED] (W.L.M.), being competent to make this declaration and having personal knowledge of the matters stated herein, declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age. The statements contained in this declaration are based on my personal knowledge and are true and correct. I am aware that they will be used in a court of law.
2. I am 57 years old. I have been incarcerated at the Clayton County Jail since May 2, 2020. My inmate number is [REDACTED] I am awaiting trial on charges of shoplifting, identity fraud, and forgery. Bond was set on my charges, but I cannot afford it.
3. I am currently assigned to Housing Unit 7, Dorm 3, Cell 7312.
4. When I first arrived at the jail on or around May 2, I had my temperature and blood pressure taken by a nurse. She did not ask me any questions about any symptoms I was experiencing, nor did she ask about any recent, potential exposure to COVID-19. After this brief screening, I heard the nurse tell an officer that I was “clear to come in.” Following this screening, I spent approximately eight hours in “intake” before I was transferred to the “orientation dorm.” For those eight hours, I was held in a small holding cell— about six feet by ten feet— with approximately six other people. There was only about one foot of

distance between the men in this holding cell. I was not issued a mask at intake. No one in this intake cell was wearing a mask.

5. After intake, I spent about one week in the “orientation dorm.” The orientation dorm looks much like the other dorms in the jail. There are 16 two-bed cells with three or sometimes even four men in each cell. There were approximately 48 men in the orientation dorm with me during that week. I slept on the floor during my time there because there were already two other men in my cell. I received no instructions or inmate handbook at this time, nor have I received any since.

6. We were not let out of our cells at all; I did not have the chance to use the showers or phones during my time in the orientation dorm. It is my understanding that my time in the “orientation dorm” was not a COVID-19-related quarantine period, but simply a regular part of the intake protocol for this jail. I know this because after I left orientation, people in my dorm who had entered the jail before March told me that they had gone through the same week-long orientation period.

7. During my time in the “orientation dorm,” I was identified as someone who may have diabetes. I had never been diagnosed with diabetes in the past but swelling in my foot led the medical staff to believe I was diabetic.

8. For the next six weeks, I was instructed to join diabetic call at around 3:00 a.m. each day. Sometimes, approximately three times per week, I joined diabetic call in the afternoons as well. Each time, a nurse would check my blood sugar level.

9. At medical during diabetic call, I would stand near approximately 30 other people in a closely packed group or single file line as we waited to see a nurse. We were only about six inches from each other while awaiting treatment from the medical staff. At diabetic call in mid-June, a member of the medical staff told me that I did not have to go to diabetic call any longer.

10. I receive daily medication for high cholesterol during pill call. At pill call, a nurse enters our dorm and approximately 18 men leave their cells and line up to receive their medication from the nurse. There is no physical distancing between men as this happens. Approximately three times per week, the nurse positions the pill cart near the officer booth to conduct pill call with two or three dorms at once. At those times, there are as many as 50 men, all with medical conditions that require daily medication, crowding around one nurse. There is another W█████ M█████ in my dorm; the medical staff has switched our medication on at least three occasions, which caused me to experience negative side effects like elevated heart rates and difficulty sleeping.

11. I have spent most of my time in the jail in Housing Unit 7, Dorm 3. On or around May 9, 2020, I was transferred from the “orientation dorm” to Housing Unit 7, Dorm 3. When I arrived, an officer placed me in cell 7315. Upon entering the cell, there was an overpowering smell of feces from an overflowing toilet. I alerted an officer. He brought me to 7316, which had a similarly overpowering odor of feces and urine. I asked the officer to be placed in another cell. Finally, I was placed in cell 7312, where I remain today.

12. My current dorm has 16 cells, but one cell is out-of-commission due to maintenance issues. Most if not all of the cells in my dorm have three people in each two-person cell. One person sleeps on the floor in each of these cells. I slept on the floor of my cell until July 2, 2020.

13. The cells and dorm common areas are unsanitary. They are covered in black mold, and cleaning is irregular. Common areas and surfaces, including phones, kiosks, and showers, are not cleaned or wiped down between uses.

14. On a typical day, we remain in our cells for 23 hours. Sometimes we do not get out at all. I have not been outside during my two months in the jail.

15. I have never been issued a towel or washcloth during my time at the jail. For most of my time in jail, I used my socks as both my towel and my washcloth. Recently, I was able to purchase a spare washcloth from a trustee for

two bags of potato chips that I ordered from commissary. I still do not have a towel.

16. I have also gone without sheets on my mattress for the last six weeks. I have requested sheets from several different officers to no avail.

17. I have received no information about COVID-19 from the jail. There have been no written postings or verbal communications from the jail security staff or jail medical staff about preventive measures or the disease's symptoms. Everything I know about COVID-19, including its common symptoms, I learned from loved ones.

18. On or around May 9, 2020, upon my arrival in Cell 7312, my new cellmate, E.R., told me that the entire dorm had been tested for COVID-19 earlier that same day, around 1:30 p.m. E.R. himself had been tested because he had experienced severe symptoms consistent with COVID-19, including fever, difficulty breathing, cold sweats, headaches, and diarrhea. While the worst of his symptoms had passed by the time I arrived, over the next several days, I saw E.R. experience some of these symptoms, including difficulty breathing, headaches, and body aches.

19. I felt so afraid being trapped in a small cell with a man experiencing COVID-19 symptoms and awaiting a test result; I knew that it was only a matter of time before I was infected. I couldn't believe that the jail placed me in a cell with a

symptomatic man awaiting the results of a COVID-19 test. I still did not have a mask. It felt as though my health did not matter to jail staff.

20. E.R. told me that many other men in our dorm and housing unit were experiencing similar symptoms. I personally witnessed men in my dorm coughing at mealtimes, “free time,” and pill call. Few of these men had masks.

21. On or around May 12, and approximately three days after my placement in a cell with E.R., I began experiencing shortness of breath, coughing, headaches, diarrhea, cold sweats, fatigue, and body aches.

22. During diabetic call on or around May 12, I told the nurse about my new symptoms while standing in line to get my blood sugar checked. The nurse got upset with me and said that I had disturbed the line. The nurse told me to put in a sick call request about these symptoms.

23. The following day, on or around May 13, I again told a nurse about my symptoms at diabetic call. She told me she would check in with the doctor about the possibility of getting tested. I had still not been issued a mask by the jail at that time. I felt like I was endangering other men at diabetic call who were standing right next to me.

24. I was then tested for COVID-19 at medical on or around May 14, 2020. I then waited for my test results for more than two weeks.

25. While we all waited for our test results, another sick man was put in our cell. On or around May 13, another man, E.P., was moved from another cell in our dorm into the cell with E.R. and me. E.P. was experiencing symptoms like E.R., including shortness of breath, fever, headaches, and fatigue.

26. On or around May 18, approximately nine days after the testing in my dorm on May 9, a nurse came to my cell and told E.P. that he was one of eight men in our dorm who had tested positive for COVID-19. E.R. had been moved to a different cell in the dorm some days earlier, so I did not hear what the nurse told him about his COVID-19 test.

27. After test results were returned to the men in my dorm, not including my own test results, we were all given masks for the first time during my time in the jail. Then we were placed on lockdown for approximately the next six days. During this time, we were not permitted to leave our cells at all, not even to shower or to make a phone call.

28. The two weeks after my COVID-19 test, including the time we were under lockdown, were some of the darkest days of my life. I began to experience severe symptoms and excruciating pain. I had such severe bowel problems that I did not stand to urinate for approximately nine days because of my inability to hold down food and water. I went through 14 rolls of toilet paper in approximately ten days. I would have to beg an officer for more toilet paper on my way back from

diabetic call each night. I lost about fifteen pounds over those two weeks. I was weak and fatigued, and I struggled to make it back and forth from medical during diabetic call. Worst of all, I had immense difficulty breathing.

29. One night during those two weeks stands out as the most terrifying night of my life. Approximately ten days after I first began experiencing these symptoms, on or around May 23, 2020, my condition took another turn for the worse. At approximately 1:00 a.m., I began to feel severe pain in my lungs; it felt as if my lungs were going to collapse. I could not breathe. I began to bang on my cell door because the emergency call button in my cell does not work. My cellmate, E.R., told me that banging on the door would not work either: no one was coming to help. I believed I was going to die that night.

30. Eventually, the banging on the door caught the attention of a trustee (“inmate worker”), who was cleaning in my dorm. I began to wave toilet paper in the cell door window to flag him down. Through the crack in my door, I told him that I was having difficulty breathing and asked him to get an officer. The trustee went to the officer booth. When he returned, he told me that the officer had told him that I had to wait until count to speak with an officer. At this point in the night, the next count was over six hours away. I did not think I was going to make it another six hours.

31. My condition worsened over the following hours. I laid my face on the floor near the crack under the door, trying desperately to get air to my lungs.

32. At count time, my symptoms were still quite severe. I told the officer about my difficulty breathing and begged him for medical attention. The officer told me to wait until “free time” (when we are briefly let out of our cells) to submit a sick call request or to speak with a nurse at pill call.

33. Later that day, I spoke with the nurse at pill call about my symptoms. She told me that she would talk to the doctor and have me brought to medical. I waited, but I was never called to medical, nor did I ever receive any medical attention for my COVID-19 symptoms.

34. I finally received a test result on or around May 29, 2020, more than two weeks after I had been tested. I had tested positive for COVID-19.

35. I have filed multiple grievances about this treatment and the jail’s failure to protect me and my dormmates from COVID-19. Each time, my grievance is removed from the kiosk without a response, meaning it is no longer listed under my active grievances. No one has ever told me about a grievance “appeal” in writing or verbally, nor have I seen any “appeal” option on the kiosk. And moreover, I had nothing to appeal since I have never received a response to any of my COVID-19 grievances. Instead, I have continued to file new grievances about the jail’s response to COVID-19.

36. While the worst of my symptoms have passed, I am still experiencing significant respiratory problems, including difficulty breathing.

37. I have been terrified for my life throughout my time at this jail. As I have told my loved ones, this experience has been like a nightmare. I have two children, and I did not think I was going to make it home to see them.

I swear under penalty of perjury that the information given herein is true and correct, and I understand that a false answer to any item may result in a charge of false swearing.

Sworn by me this 7 day of July, 2020.

/s/ W ■ L ■ M ■

W ■ L ■ M ■ (W.L.M.) (signed
with express permission)

EXHIBIT D-11

Declaration of D.H.

DECLARATION OF [REDACTED] (D.H.)

I, [REDACTED] (D.H.), being competent to make this declaration and having personal knowledge of the matters stated herein, declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age. The statements contained in this declaration are based on my personal knowledge and are true and correct. I am aware that they will be used in a court of law.
2. I am 28 years old. I have been incarcerated at the Clayton County Jail in Jonesboro, Georgia since February 26, 2020, serving a nine-month sentence for a technical probation violation. My inmate number is [REDACTED].
3. During my time in the jail, I have primarily been held in Trustee Dorm 1 and Trustee Dorm 3.
4. I am a trustee, or an incarcerated worker. Trustees do jobs around the jail, like cleaning other dorms, preparing food in the kitchen, and serving food to detainees at mealtimes. We work long hours—usually 12 hour shifts or longer, seven days a week. In exchange, we get “good time” credit, which means that for every 30 days we work we are supposed to get eight days taken off of our sentence.
5. The trustee dorms are open dorms. In the open dorms, all spaces are common spaces, and there is no way to stay six feet apart from others. We eat around tables that pack four chairs around a 4 ft. by 4 ft. tabletop. We all sleep in

bunk beds that are arranged in pairs. There are about 24 sets of bunk beds, or about 48 beds. Each bed is within four or five feet of three other beds. We all use the same bathroom, phones, and kiosk.

6. The trustee dorms are crowded and unsanitary. Trustee Dorm 1, the one I am currently in, has about 40 people in it right now. The day room is roughly 20 ft. by 50 ft. In the evenings, when people are back from their work shifts, the day room becomes extremely crowded. There are leaks all over the dorm. The floor and the showers are covered in mold.

7. It is one trustee's job to keep the dorm clean, but he lacks the materials to do it. The only cleaning solution he has is the jail's own "brand" of watered-down cleaning liquid, which is mixed at the jail. I frequently go to the warehouse in connection with my trustee duties. There, I can see the area where the jail's cleaning solution is mixed and diluted. When I smell the bottle, it seems to me that it's mostly water. I have asked officers to borrow the cleaning solution that the staff members use, which appears to actually disinfect surfaces. They have always refused these requests.

8. In these dorms, there is no way to reliably get help in the event of an emergency. Both Dorm 3 and Dorm 1 have no emergency call button, appear to have no cameras, and have no staff stationed inside the dorm. In the event of an

emergency, we have only two options: bang on the door until a staff person comes or call a loved one and see if they can contact the jail.

9. A few weeks ago, we heard the trustees in Dorm 3 across the hall banging on their door and went to our door to look through the window. Inside their dorm, a man was seemingly unconscious and laying on the ground in their common area. We knew from talking to those men that the phones in Dorm 3 weren't working, so a man in my dorm called his wife on the dorm phone and asked her to call the jail to tell them someone was hurt in Dorm 3. It took about 15 to 20 minutes before a jail staff person finally responded to the dorm.

10. From when I arrived at the jail in late February through most of April 2020, I did not observe any trustees or other detainees receive any face protection from the jail or medical staff. Instead, in early April, jail officials told us to cover our faces using sheets or towels.

11. I was finally given a disposable paper mask in late-April, but within a few days one of the straps on the back of the mask broke. The mask would not stay on my face, and so I asked a jail officer for a new one. The officer became angry with me and told me to use a towel. I continued to use my towel to cover my face until mid-May, when I was given a new disposable paper mask.

12. In April and May, I worked the night shift as a trustee worker in Housing Unit 7, where I would clean and distribute meals in the six dorms in the

housing unit. The problems with sanitation and crowding I saw in the general housing units were even worse than in the trustee dorm. Just about everyone in the general jail population was sleeping three to a cell. Many dorms were covered in mold. It was gross and unsanitary.

13. In April, four or five people in Trustee Dorm 3 started getting extremely sick with symptoms of COVID-19. One of these men slept on the bed directly across from me. Another one was my partner on my work shift. These men were bed-ridden, coughing, vomiting, yellowish in the face, and had high fevers. However, they remained in the same dormitory with the rest of us who were not showing symptoms of COVID-19.

14. Jail officers and medical staff were aware that people in the dorm were showing symptoms of COVID-19. Officers walked through the dorms every day for count and observed people coughing. I heard one of the particularly sick men, I.A., ask the officer who supervised our shift several times to go to medical, telling him about his symptoms. The officer eventually allowed I.A. to go see medical, but I.A. reappeared in our dorm the same day, and told us that medical sent him back.

15. Despite knowing that people in the dorm were symptomatic, no one from the jail did anything to separate me and other non-infected people from the sick people. No one tested us for COVID-19 or checked our temperatures. Jail

officers instructed the other trustees and me to continue carrying out our jobs around the jail. All of these jobs involved moving around different parts of the jail and coming into close proximity with detainees in other housing units.

16. About a week later, two of the people with the worst symptoms were removed from our dorm and taken to the infirmary. The sick men who were removed were M.G., the man who slept just feet away from me, and I.A., the man who I had been working alongside.

17. After the men were removed, the jail staff did not clean the dorm or the area where the sick men had been, instruct us to clean those areas, or supply us with additional cleaning materials to clean those areas. The bunk across from me held M.G.'s belongings for five or six days before they were retrieved. I took it upon myself to track down a spray bottle of watered-down cleaning liquid and sprayed down the neighboring bunk. No other cleaning was done.

18. Still I was not tested for COVID-19. No one came around to take our temperatures. No one from the jail or medical staff told us what was going on or provided any information about what we could do to protect ourselves.

19. Once I started to see signs of COVID-19 infections in the jail, I grew fearful of catching the virus and of spreading the virus to others in my role as a trustee. The other trustee on my shift, I.A., had gotten sick and was sent to the infirmary. I was sure the same would happen to me. I knew people were sick in

Housing Unit 7 because on multiple occasions, when people were removed from the unit to the infirmary, it was my responsibility to retrieve their personal items and bring them to the infirmary. The officer on duty during my shift said two of the dorms in the unit were under quarantine. I pled with him not to go into those dorms. I told him I was afraid and that I had a one-year-old daughter that I wanted to see again. But the officer said he would take away my good time if I did not do it, so I entered each dorm with only my towel wrapped around my face. Within a week, I was sick.

20. I started feeling sick in late April, around a week after I first observed men in my dorm becoming sick. I was having hot and cold flashes. My ribs and whole body ached, and I was experiencing bad headaches. I couldn't eat, and when I did, I felt like I would throw up. I couldn't taste or smell but didn't know it was COVID-19 because I was not familiar with the symptoms at the time.

21. I was not alone. I began hearing a growing number of people in my dorm complaining about headaches and appearing unwell.

22. At the time, I didn't know what the symptoms of COVID-19 were. The jail staff had never told me anything about the symptoms of COVID-19 beyond asking us if we had a fever. There were no informational signs about COVID-19 anywhere in the detainee living areas. We detainees had to ask one another to try to share knowledge and figure out if we might have symptoms.

23. I attempted to get medical attention. I told an officer some of my symptoms and he gave me permission to go to the medical wing. When I arrived, I told a nurse about all my symptoms. The nurse took my vitals and told me my blood pressure was elevated. He said this was probably because I had just eaten some soup. I tried to insist that I knew my body and could tell that I was unwell, but he sent me back to my dorm. I was not given a test for COVID-19.

24. For approximately the next two weeks, I continued to follow orders and do my trustee job while I was sick and actively symptomatic. With a towel wrapped around my face as a mask, I spent 12 hours every day passing food trays in and out of dorms in another housing unit and attempting to clean up in the common areas.

25. Around May 7, medical staff came to the dorm and tested each of the roughly 30 trustees in the dorm. I was tested. The tests were pending for about five days. While we waited for our test results, two more trustees were removed from the dorm. However, the remaining trustees and I continued to do our jobs, as required by the jail administration.

26. When the tests came back, around May 12, two nurses came to our dorm and called us up one by one to inform us of our test results. They told me that I had tested positive and handed me a paper mask. Speaking amongst ourselves as trustees, it was clear that almost everyone in the dorm had tested

positive. Only about four to six people in the dorm said that they had tested negative. Those people had not received masks from the nurses.

27. Only on or about May 12, after the majority of our dorm tested positive for COVID-19 did jail officials place our dorm into an alleged “quarantine.” By this time, I had already been sick for roughly three weeks. We were locked down in “quarantine” for approximately the next 17 days. Trustees were no longer let out of the dorm, including the trustees who appeared healthy and the trustees who had tested negative.

28. The jail’s medical staff largely ignored everyone in our dorm during “quarantine.” Those of us who were sick received no treatment whatsoever for our symptoms. The only times a nurse came to our dorm was to conduct pill call for people who already received medication for preexisting conditions.

29. While in “quarantine,” jail staff treated us like animals. The nurses doing pill call didn’t enter the dorm—instead, they passed pills through a narrow crack in the door. To avoid entering the dorm, officers frequently took the cart holding our food trays and kicked it so that it rolled through the doorway and into the room.

30. We were also prevented from telling our loved ones what was happening to us. All my kiosk messages to family members that mentioned COVID-19 remained pending indefinitely on the kiosk and never reached the

person I was sending them to. Other trustees told me the same thing happened to them as well.

31. The handful of people in our dorm who had tested negative for COVID-19 were locked down with the rest of us and had no masks. They shared all the same spaces with people who had tested positive, slept within six feet of people who had tested positive, and used the same bathroom and phone as people who tested positive. Even R.H., the man assigned to clean the dorm during “quarantine,” had tested positive. Although we were locked down together, the people who had tested negative on May 12 were not tested a second time.

32. I was originally told by jail staff that the jail would wait until every trustee who had previously tested positive had tested negative twice before lifting the trustee dorm “quarantine.” But we were only tested once more, on or around May 24. Within two days of that test, the “quarantine” was abruptly ended.

33. On or about the morning of May 26, jail staff entered the dorm, informed us that everyone who had previously tested positive had tested negative in the latest test, and sent us back to work around the jail that same day. The trustees who had tested negative on or around May 12 were not given a second test before the “quarantine” was lifted, but they too were sent back to work in other parts of the jail.

34. Around the middle of May, while I was “quarantine,” I submitted a medical request asking for paperwork showing that I tested positive for COVID-19. My request was denied. The jail’s response said testing paperwork is only available after I am released from custody.

35. The kiosks in the dorms only let us have two grievances pending at a time. The jail takes months to answer grievances. I have two old grievances pending on my kiosk screen. I submitted one of the grievances in March and the other one in early May. Nearly four months have passed since I filed the first one. I would like to file a grievance about how the jail is treating us during this pandemic, but I can’t do that until the jail resolves one of my old grievances.

36. In the past week, I have seen the jail make two minor changes. On or around July 8, they gave each trustee in my dorm a white fabric mask. These masks are a bit better than the paper ones we had been using because we can rinse them, but they feel homemade. They are made of thin cotton, like the fabric on a t-shirt, and they have no filter or pocket for a filter. Then, on or around July 9, jail staff put up several pieces of paper in the dorm telling us to wear our masks and observe social distancing. Despite these instructions, jail services have not changed at all. Our bunks are still less than 6 feet apart and the jail staff continue to order us into close lines with other people every day.

37. About a month ago, in early June, I was transferred to a new dorm and a new trustee position. I am now in Trustee Dorm 1, and my new job is running the car wash for the vehicles of the Clayton County Sheriff's Department. I work the department car wash from 6 a.m. to 6 p.m., seven days a week. From my position in the parking lot and garage, I observe quite a bit.

38. In the last six weeks, I have seen two bodies removed from the jail. First, in late May, I watched as a black van with the name of a funeral home on the side pulled up to the garage door, and jail staff wheeled out a full body bag on top of a stretcher. The jail staff loaded the body bag into the back of the funeral van, and it pulled away.

39. Then, on or around the morning of July 8, I watched as an ambulance pulled up to the garage door. A man was brought out on a stretcher, accompanied by EMTs. I could see that he was not breathing, and his feet were blue. An EMT was trying to resuscitate him. I recognized the man on the stretcher as a friend named M.D. M.D. was a trustee who left the jail each day to work outside of the jail. He would swing by the garage most mornings and evenings to chat with me on his way to and from his job. I couldn't believe what I was seeing. I had just talked to him less than a week earlier. He had told me he only had a few weeks left on his sentence and would be going home soon. The EMTs loaded him into

the ambulance, closed the doors, and they sped away. An officer later told me that M.D. had died.

40. I am scheduled to be released from the jail in August, and it could not come soon enough.

41. This whole experience has been a nightmare. I have two daughters, and I just want to make it out of here alive to hold them again.

I swear under penalty of perjury that the information given herein is true and correct, and I understand that a false answer to any item may result in a charge of false swearing.

Sworn by me this 14 day of July, 2020.

/s/ D [REDACTED] H [REDACTED] (by express permission)

[REDACTED] (D.H.)

EXHIBIT D-12

Declaration of R.L.

DECLARATION OF [REDACTED] (R.L.)

I, [REDACTED] (R.L.), being competent to make this declaration and having personal knowledge of the matters stated herein, declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age. The statements contained in this declaration are based on my personal knowledge and are true and correct. I am aware that they will be used in a court of law.
2. I am 48 years old. My LE number is [REDACTED].
3. I am what the jail calls a “weekender.” Weekenders arrive at the jail on Friday evening and leave on Sunday evening. We do not stay at the jail during the week.
4. I am serving a sentence of 50 weekends in the Clayton County Jail for a drug conviction. I began serving my sentence on the first weekend of January 2020, and I am scheduled to complete my sentence in December 2020.
5. In the last several months, I have become very anxious about reporting to the jail for the weekends. It’s well-known that COVID-19 has spread throughout the jail. Inmate workers have told me that there were infections in their dorm. But, in spite of the outbreak, the jail staff told me and other weekenders that we had to continue reporting to the jail unless a doctor on the outside writes a note to the jail saying we have COVID-19 or another urgent medical condition.

6. A few weekends ago, I saw that three of the other weekenders in our dorm were getting sick. They were coughing a lot and they each remained in bed for the whole weekend. The next weekend, they did not come back to the jail. They have not been back since.

7. Having to report to the jail every weekend during the COVID-19 pandemic has cut me off from my family and my support system. Normally, I live with my parents, but my parents are both medically vulnerable to COVID-19. My father is 70 years old and has a disease called gastroesophageal reflux disease, which has caused blood vessels in his stomach to burst on two occasions in the past. My mother is 66 years old and struggles with high blood pressure. Due to my parents' advanced age and health issues, it isn't safe for me to stay with them after spending time in the jail. I can't quarantine for the recommended two weeks because I must return to the jail each weekend. As a result, I have been homeless and sleeping in my car since the middle of March.

8. I'm scared of getting COVID-19 at the jail, but my understanding is that a warrant for my arrest would be issued if I fail to appear on even one weekend. My probation officer told me she is shocked that the jail is still instructing me to report during the outbreak at the jail, but she said she can't protect me from an arrest warrant if I don't appear. I'm worried about violating the terms of my sentence. When I was first arrested, I spent two days in the jail's

general population housing units before I received a bond. That was a horrible experience, even before the coronavirus. I was held in cramped, unsanitary, and dangerous conditions with very little out of cell time. I keep coming back to the jail because I don't want to risk being sent back there.

9. Intake has barely changed at all since the pandemic began in March. I go through intake at the jail every weekend. On Fridays, I arrive at the jail around 5:40 p.m. Other weekenders and people on work release, usually about 10 to 12 people, gather outside the back gate to the jail and wait to be brought inside. Everyone is usually wearing masks. We wait until an officer comes to get us, usually around 6:30 p.m. or later. When the officer arrives, they usually order us to get in a single file line, only a step or two apart, before bringing us in to the jail.

10. The officer walks us through the building to the entrance to the intake area. We wait by the door as a nurse takes each of our temperatures. The nurses only check the temperature of detainees, not staff. Every week, I see arresting officers who are bringing new arrestees to the jail walk straight in without a temperature check. On one occasion, I heard the nurse on duty ask out loud why she was taking detainees' temperatures if she wasn't taking the temperature of the officers who are bringing people into the jail. A few staff members shrugged and shook their heads, but I didn't hear anyone answer her.

11. We proceed through intake with no efforts by jail staff to tell people to observe social distancing. Once inside, we are pressed into the same small space along with other “new admissions” to the jail as an officer searches us. We are then guided to the window where we pay our weekly “room and board” fee of 30 dollars and receive our receipt. After that, we are ordered to sit in chairs arranged in a tight row. We sit there for anywhere from 30 minutes to 3 hours until officers come to “dress us out” in our jail clothing.

12. Once we are dressed, we are usually placed in an intake holding cell before we are taken to our dorm. The holding cell is about 10 ft. by 10 ft. in size and there are often about 20 people inside it. There is rarely even enough room to sit down. We typically spend anywhere from 15 minutes to 2 hours in the holding cell before we are taken to our dorm, where we arrive between 9 and 11 p.m.

13. Weekenders and work release people live in an open dormitory, with bunk beds arranged in groups of four beds close together.

14. Every weekend, even during the pandemic, there have been new people in our dorm who have just begun their weekender or work release sentence. Last weekend, July 17-19, 2020, one man in the dorm was a new weekender. He told me he had just been sentenced to serve five weekends.

15. When I am at the jail, I do not see jail staff make any efforts to allow us to maintain social distancing. The weekend before last, when I arrived at the

jail, I saw the jail had hung up some pieces of paper in the dorm that say everybody should always wear a mask and practice social distancing. The jail continues to have us line up close together to receive our meals and to escort us throughout the jail.

16. The jail has not given us any information at all about COVID-19 or its symptoms. However, because I spend my weekdays on the outside and have access to the news and the internet, I understand that COVID-19 is a serious and deadly virus and that social distancing is critical to avoiding infection, so I do my best to keep space between myself and the other people in the dorm.

17. In April, jail staff handed out masks to me and the other weekenders at intake and said if we didn't bring our mask back each weekend, they would charge us five dollars for a new one. Then, in late April, Officer Claiborne told us all that we must bring our own mask each weekend; we would not be able to buy a replacement from the jail. He told us that if we didn't bring a mask, the jail will "turn [us] around and put a warrant on [us]." Since that announcement, I have brought my own mask.

18. Until recently, the trustees who come into our dorm to feed us were not always wearing real masks. Even in May, some of them were still wearing a tee shirt wrapped around their heads when they entered our dorm to distribute our food trays.

19. Our dorm is extremely unhygienic. There is mold on the bunk areas, and we are not given appropriate cleaning materials. The only thing in the dorm I receive for cleaning is a bottle of liquid which we are told is a 3-in-1 shampoo, soap, and shaving cream. We receive nothing else to clean with.

20. We are not given access to any hand sanitizer. I asked an officer if I could bring in some hand sanitizer from outside and was told I could not.

21. The showers are disgusting to the point of being unusable. There are three shower stalls and all three are covered in mold. The showers are so gross that I don't even shower when I'm at the jail. In my time at the jail, I have only seen someone use the shower once.

22. We don't drink the water in the dorm. The water that comes out of the fountain is brown. Those of us who can bring money with us use it to buy water from the store.

23. The orderly assigned to clean our dorm is not given adequate cleaning supplies. The orderly often expresses his frustration to me and my dormmates that he does not have the materials necessary to keep the dorm clean. The only cleaning material he has is a single bottle of blue liquid to spray. He sometimes lends it to me and others. It does not smell like bleach or other chemical cleaners. My impression is that it covers up bad smells, but it does not disinfect, kind of like Febreze. Often, when people go to use the bathroom, they spray it into the air as

an air freshener. I've heard the orderly ask officers for "real cleaner" multiple times, but I've never seen him get any.

24. The weekend before last, I heard the dorm orderly asking an officer for a mop. He said the dorm had not been mopped in two weeks. When I left that Sunday evening, he still had not received a mop.

25. On several occasions, there have not been any mats in our dorm when we arrive on Friday night. When this happens, we usually either sleep directly on the steel bedframes or stay up all night, and hope that an officer will help us get mats the next day.

26. In January, during my first weekend in the jail, there were no mats when we arrived. Several detainees used the dorm phone to call family members and ask them to call the jail to tell them that our dorm did not have enough mats for everyone. Later that day, Sheriff Hill, a captain, and several members of the SRT team burst into the dorm. The Sheriff yelled at us while the SRT team tossed all of our things into a pile in the middle of the floor. He yelled that he hates all weekenders, that we are "fake criminals," and that we "remind [him] of nerdy businessmen that work nine to five during the week but want to be in a bike gang during the weekend." Ever since that incident, we no longer ask family members to call the jail when we need something, like mats. We just go without mats and sleep on the steel bedframes.

27. The experience of having to repeatedly go in and out of the jail during this pandemic is terrifying. I constantly worry that I could get COVID-19 from being in the jail, or that I could bring it in or out of the jail with me. I'm concerned for my family's health, as well as my own. I spend my weeks unable to hug my parents or sleep in my bed, dreading Friday evening, when I have to return to the jail.

I swear under penalty of perjury that the information given herein is true and correct, and I understand that a false answer to any item may result in a charge of false swearing.

Sworn by me this 19 day of July, 2020.

/s/ [REDACTED] (by express permission)

[REDACTED] (R.L.)