

EXHIBIT 1

DECLARATION OF ANTHONY SWAIN

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

1. My name is Anthony Swain. I am 43 years old. I am currently incarcerated at the Metro West Detention Center in Miami, Florida in cell 1D2. I have been in jail since February 3, 2016.
2. I have cystic myelomalacia from my C3 to C6 vertebrae. I am a parapalegic. I only have 50 percent of my body remaining. My femur is amputated. I have a crack in my pelvis. I have no feeling in my left arm. I have no feeling in my fingers. I have severe pain in my spinal chord. My entire body aches. My breathing and respiratory system are failing. I am confined to a wheelchair.
3. I am trying my best to take care of myself in the midst of this pandemic, no different from you, no different from any other human being. But it's impossible to do that at this jail. Corrections treats us like we are the scum of the earth, like we don't deserve protection. The cell is filthy and we have no access to hygiene products. Today [on April 3rd] I had to make a mask out of my yellow sock and an elastic string from my catheter bag. We are crowded together with no space between us. We inmates are scared.
4. The cell that I am in houses the most medically vulnerable people in Metro West. There are people in here who have AIDS, people who are recently coming out of surgery, people who are elderly. Despite that, there are no measures taken to protect us from new people who circulate through our cell every day. We see people who are coughing, have fevers, and are otherwise ill, but they aren't tested and we don't know what they have.
5. There was one individual who came in here within the last month who was feeling terrible. They took his temperature and found that it was 103 degrees. It took Corrections almost a week to send him to the hospital. During the entire time he was waiting to go to the hospital, he was mixed in with the rest of us, using the same things we use. Soon after that, there was another person who came in with a sore throat. He told us that he didn't feel well and told us to stay away from him. He was sweating in his sleep, and within a day, he couldn't get up out of bed. They left him in our cell for two days before they sent him to Jackson hospital.
6. There are about five people in my cell who are coughing, or otherwise complaining about being sick.

7. Even staff in here are sick. A cart nurse who passed out our medication was working in our cell for almost a month. The whole time he was here, he was coughing and sneezing. He finally he stopped coming to work, and is now in quarantine. On April 1 at 2 a.m., an officer came over to my friend telling him that she needed his help. She told him that she didn't feel well and asked him to count the trays for her in the hallway. I told my friend to try to take care of himself when he was out there. Only God knows what she is sick with. And even with that being said, she was walking around without a mask. Guards don't wear masks or gloves. There aren't enough masks to go around.
8. During the four years I've been here, I've seen many infectious diseases spread around the cell. Just the other day, we had someone in here with MRSA [methicillin-resistant staphylococcus aureus], which is spread through skin-to-skin contact or contact with a contaminated object. He was in here using all the same things that the rest of us use, but it wasn't until after he left that the officers told us that he was sick with MRSA. How can we protect ourselves if we don't know about someone's contagious disease until after the fact?
9. Earlier this year, one person in my cell had scabies, and they left him in here with us for weeks on end before they moved him to open population. By the time he left, more than ten people in the cell had scabies. Pink eye is always going around. There are about fifteen people who have it in my cell. In addition, new people bring in lice, which is then passed around the cell. There is nothing we can do to protect ourselves, no matter what we try, without the assistance of Corrections.
10. There are already people in Metro West who have coronavirus. The cell right next to mine, 1D4, is quarantined. Officers who work in my cell, 1D2, go over to 1D4 and come back in here. After we hounded them, they told us that one inmate in there has coronavirus, and all the people around him got sick and are quarantined. 1D4 has about 60 people in it, and the last I heard, 22-25 people of them are currently sick. The officers told us there's a lot of people coughing in there, and the inmates don't have masks. None of the officers or nurses want to go in there. I've heard officers from my cell argue in the hall about who is going into the unit, and they try to push the younger officers in the units that are infected. Then, those same officers come right back in here and have contact with us. When they come back, the other officers tell them, "don't come near my desk, stay where you're at." The way I hear the officers talk, it's clear to me that they are in fear for their lives and don't want to take the virus home to their families.

11. 1D2 and 1D4 share the same air vents. The only thing that divides our bathrooms is a door. This is the door that the corporal walk between to do checks between the two cells. If I were to write a note on a piece of paper, I could slide it under the door to their cell.
12. Despite all of these things that are happening in here, Corrections hasn't issued any publications, flyers, pamphlets, announcements, or anything else to educate us about the coronavirus or how to keep ourselves safe. Every once in a while, an officer will say to make sure we wash our hands. It seems to me that Corrections is trying to stay out of the way, hoping that the situation in here doesn't go public or hit the news. The information that we have is from the news, or based on things we overhear or get out from nurses, officers, or other inmates. That creates a lot of fear, especially given that we're hearing that the coronavirus is in the cell right next to us.
13. This place is a petri dish for disease. We are in such close quarters. You can stay six feet away from other people on the outside, but for us, we are less than two feet away from other people at all times. There are four rows of beds with eight beds per row. One of the walls has sixteen beds of "medical housing," which is used for people who are coming out of the hospitals or off the streets with an illness. People in medical housing are often coming in here coughing, hacking, and dirty. Medical housing isn't separated in any way from the rest of the cell. The air circulates in here horizontally, meaning that anything that happens on one side of the cell comes to the other side of the cell. In our unit, if you sneeze, cough, or even pass gas, the person on the other side of the unit can smell it.
14. All of us use the same toilets, the same sinks, the same remotes, and the same phones. People all crowd around the same TV. The remote is filthy. I would have to use gloves to touch that thing. We use the same water cooler and a little hot pot to heat water. We don't even have access to personal hygiene products. We can't take any preventative measures to protect ourselves from covid.
15. Corrections does not hire people to sanitize our cells. Instead, they have trustees who do it for free, and who aren't provided with proper protective equipment. They aren't giving masks or gloves to trustees who are doing all the dirty work and cleaning dirty people. The cleaning supplies that we are given aren't real cleaning supplies: they are extremely watered down. We have people in this unit bleeding, yet we don't even have bleach. I've seen blood on the floor because the supposed cleaning products they give us can't even clean that up.
16. On top of that, our cell is disgusting -- which is especially horrible considering that officers tell us that our cell is the cleanest one in Metro West. The base of the telephone

leaks because the shower is on the other side of the phone. The showers are dirty regardless of the cleaning supplies that the trustees use to clean it. I have written multiple grievances about the showers because there is something growing in the handicapped shower that I use. You see plants growing from the floor of the shower, ants running around the floor, and mildew everywhere. I have to write grievance after grievance for the shower to be cleaned -- it usually takes 2-3 months to even get a response. The windows are leaking, the sinks are broken, and there was a rag stuck in the handicapped toilet until recently. There are stains on the ground from people falling and busting their heads open on the floor.

17. I can't trust Corrections to take care of us if we do contract the virus. In my experience, Corrections cuts costs and ignores the medical needs of inmates. For example, I slipped and fell in February 2017, and hurt my wrist. I filed grievance after grievance to be taken to the hospital, but my grievances went unanswered for more than a year. When I was finally taken to the hospital, more than a year and a half later, I no longer had any feeling in my left arm. The doctor at Jackson told that if I'd come sooner, they would have been able to save my wrist. Now, they are going to have to fuse my wrist together.

18. It has also been my experience that Corrections removes people from medical housing as soon as they possibly can because medical housing is more expensive. I have seen Corrections throw sick and injured people into open population with everyone else when they need to be in medical housing. This threatens their safety and the safety of everyone around them.

19. This is a place where I wouldn't want to catch anything.

This declaration was orally sworn to by Anthony Swain on April 3, 2020 because the Metro West Detention Center is currently not permitting documents to be exchanged for signature.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Anthony Swain on April 3, 2020.

A handwritten signature in black ink, appearing to read 'Maya Ragsdale', with a horizontal line extending to the right.

By:

Maya Ragsdale

Date: April 3, 2020

EXHIBIT 2

DECLARATION OF WINFRED HILL

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

1. My name is Winfred Hill. I am 59 years old. I am currently incarcerated at the Metro West Detention Center in Miami, Florida in cell #1D3. I have been in jail since March 6, 2020.
2. I am terrified of getting the virus in here. I have been diagnosed with HIV and diabetes. My body and my immune system are already fighting two diseases, and if I am exposed to the virus, I'm scared that I'll end up dead.
3. I have heard that the virus is already in two cells here. The cell next to mine has a big sign on the door that says "quarantine." There are rumors that someone has the virus in there, but no one really knows what's going on inside. I heard that there's another cell on quarantine as well because someone else tested positive for the virus in there.
4. Corrections hasn't been giving us sufficient information about the coronavirus. There haven't been any announcements. They won't tell us anything, not even if anyone in here has tested positive. We only know what we find out by watching TV. That's scary because we don't know what's going on, how to protect ourselves, or what Corrections is doing to protect us. I don't see anything that they're doing to protect us.
5. I don't feel like there is any way for me to stay safe in here. I am in a cell with 44 other people, and a lot of people in the cell are constantly coughing. We sleep right next to each other, not even a foot away from each other. On top of that, we are forced to share bunks with other people: I share a bunk with one other person. There are too many people in here to practice any kind of distancing.
6. They don't even clean the cells to make sure they're sanitary. We have to clean our cells ourselves. The people who are assigned to clean are called "trustees." They wipe down the phones, but they don't give us enough to actually clean. They give us watered down chemicals. In jail, they try to save, they try to cut stuff, to keep the chemicals stretched out.
7. We're not getting what people outside get. They aren't giving us gloves. People outside have gloves. What about the people in jail? Why don't we have gloves?

8. Every day, there are new people coming into the cell, usually around four people per day. There are new guards coming in here every day too. Some of them wear masks, some wear gloves, but not all of them. They go home every day. So if someone has gotten it on the outside, what are we going to do to prevent it from being spread in here? We are exposed to whatever people are bringing from the outside.
9. There are people being brought in from the streets who are coming into the cell coughing. We don't know if they have coronavirus or not. Even when people are coughing, Corrections doesn't send them down to get checked up. No one is coming through the cell and testing people for the virus or taking people's temperatures to see if they have a fever.
10. If someone wants to get checked up, we have to make a "sick call" to go down to the medical clinic. It takes 4-5 days to get a response to a sick call. Most of the time, if we get a response to our sick calls, the most they'll do for us is give us a cold pack. It isn't until we're feeling like we're about to die that we get help.
11. We are people, but we aren't being acknowledged as people. We're just here and they aren't protecting us from anything.

This declaration was orally sworn to by Winfred Hill on April 4, 2020 because the Metro West Detention Center is currently not permitting documents to be exchanged for signature.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Winfred Hill on April 4, 2020.



By:

Maya Ragsdale

Date: April 4, 2020

EXHIBIT 3

DECLARATION OF ALEN BLANCO

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

1. My name is Alen Blanco. I am 39 years old. I am currently incarcerated at the Metro West Detention Center in Miami, Florida in cell 2C2. I have been in jail since December 27, 2019.
2. The fear I have for my safety and health has been making me lose sleep. As inmates, we rely on MDCR to protect us during this time of crisis, but the precautions in here are slim to none. If the virus were to enter our cell, it would spread like wildfire.
3. I am particularly vulnerable to COVID-19. I have had severe asthma since I was born. If the virus comes in here, what happens then? I'm already compromised because of my asthma, and will be severely at risk. There are a lot of other people in here who have preexisting medical conditions or who are elderly. Older people and people with health problems are particularly worried. We are all scared.
4. Even during the best of times, getting medical help at Metro West isn't easy. When I first came to the jail, I put in a medical request for an inhaler, but it took three months for MDCR to give me my inhaler. If I don't have an inhaler, and I have an asthma attack, it's hard for me to breathe. During the time I didn't have an inhaler in jail, I had three asthma attacks. I rely on my inhaler a lot. Each inhaler they give us has 200 pumps, and I've already had to use it 15 times.
5. On top of this, I've been feeling terrible over the last week. My throat hurts, my chest hurts, I am having trouble breathing, I am constantly having a dry cough, and I feel weak. I have been really scared because my symptoms match the ones I've seen in the news for coronavirus, and the symptoms hurt especially badly because of my asthma. I put in the medical slip to get checked out, and I had to wait three days to get called down to see a nurse. During that three day period, I was in general population with everyone else.
6. When I was called down to the clinic to see the nurse, there were many people waiting, but we were not told to sit six feet apart. I asked for a mask and gloves, but was denied, despite the fact that there are sick people in the medical unit. When it was my time to talk to the nurse, I told him my symptoms, including that I have a dry cough. The nurse did a routine check up and gave me a cold pac, which is just a tylenol cold pill. I specifically asked to be tested for coronavirus due to my symptoms, but the nurse told me that there

were no tests available. I don't feel safe going back to the clinic, because I have no idea what I could catch down there. I still feel sick and am coughing constantly.

7. I'm not the only person in my cell who is coughing. There are numerous people who are sick and coughing, and new people come in coughing frequently. One person in my cell said his chest was hurting and he has been coughing, but he told me that MDCR refused to test him. No one in my cell, regardless of whether or not we have any symptoms, is being tested or screened. If we want to go to the clinic, we have to put in a medical slip ourselves, and then wait at least three days to be seen.
8. I've been hearing on the news how contagious the virus is, and how fast it's spreading in other jails like Rikers. I'm really worried about the same thing happening in Metro West. We're packed into a cell that makes it impossible to practice any of the recommendations that we see on the news. I share a cell with 63 other people, but I saw in the news that we are recommended not to be in gatherings of more than 10 people at a time. We sleep at arms length from each other, but I saw that we are supposed to stay at least six feet away from other people. I am 5 feet 6 inches tall and I can reach across and touch the other bunk. There is a bunk underneath me as well. There is no way to practice any kind of distancing.
9. There are also new people coming in and out every day. We never know what new inmates coming in may be exposing us to. A few weeks back, one inmate came in with a mask. The guards were scared of him. He was in the cell for two weeks, and he was coughing the entire time. We were never told what he had and I never saw him go to the medical unit. The same goes for officers. An officer told me they worked a shift right before coming into our unit where he was in a cell that was quarantined. He said that the whole cell was quarantined, which would include at least fifty people. We are trapped in our cells and are vulnerable to whatever people are bringing in.
10. To make matters worse, we are forced to share everything. Our only source of water is a tiny little water cooler. In order to get water, we have to fill up our empty, used water bottles. People drink out of the water bottle, and then put the water bottle right up to the spigot, touching the spigot, which means that any saliva left on the mouthpiece of the bottle gets on the spout where the water comes out of. I sometimes avoid drinking water for that reason.
11. We also share three showers, four sinks, and eight toilets between us (multiple sinks, showers, and toilets are broken). The bathrooms are really dirty, as are the sink areas. The

showers are disgusting. We have to share phones, which are dirty and aren't sanitized between uses. I always put a sock on the phone when I use it to try to protect myself.

12. We also don't have free access to basic products to keep ourselves clean. We don't have toilet paper. We don't have tissue paper. We don't have access to proper hygiene products. We are given state soap, which isn't antibacterial. To have antibacterial soap, you have to buy it from the commissary, which I do once a week. I buy extra antibacterial soap when I can so that other people around me who can't afford it can protect themselves too.
13. We can't even wash our clothes right now. The laundry is broken, and even when it was working, there often wasn't any laundry detergent available so I had to create my own mixture to wash my clothes. I'd mix my soap from the commissary with state soap and water.
14. The air ventilation system in here is also terrible. The air vents are extremely dirty and it's so dusty in the cells. I can see the lining coming from the filter, from one room to the next, so it seems to me that the air is shared between cells, throughout the floor.
15. I think that these conditions are the reason why there have been other outbreaks since I've been in jail. We are too packed close to each other to prevent the spread of illnesses. For example, a simple cold has been going around for about two weeks now and more than 15 people are coughing and sneezing.
16. This situation isn't safe for the correctional officers either. One of the officers told me this week that they have to bring their own protective gear to work, and if they do get sick on the job, that they will not get workman's compensation. That concerns me because that is an incentive for people to come to work, even if they are feeling sick.
17. To make matters worse, Corrections isn't telling us anything. We learned that there was an officer who tested positive for coronavirus from the news. We're the last ones to know, we're in the dark. Everything we find out about, we learn through the news. Every guard tells us something different, and there are no announcements that are made about what's going on.
18. I have tried to file grievances repeatedly, asking the officers at every shift. Each time, officers tell me that they have to go somewhere else to get the forms, and when I check back with them, they tell me to just wait. I filed one grievance on April 3 because Corrections only brought a few grievances to our cell and other people wanted to file

grievances as well, and so there were not enough grievance forms for me to file about every issue that I have. The grievance that I wrote pertained to our lack of access to masks. I could not write about any of the other concerns that I have about our lack of protection from coronavirus by Corrections, because each grievance must be very specific or it will be rejected.

19. I can only imagine what the coronavirus would do if it was in here, how far it would spread, how fast it would go. As much as they say we're safe and the virus is not in the building, we hear and see otherwise. All I'm asking is a chance to have the medical care and protection that people have on the outside.

This declaration was orally sworn to by Alen Blanco on April 3, 2020 because the Metro West Detention Center is currently not permitting documents to be exchanged for signature.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Alen Blanco on April 3, 2020.

A handwritten signature in black ink, appearing to read 'Maya Ragsdale', with a horizontal line extending from the end of the signature.

By:

Maya Ragsdale

Date: April 3, 2020

EXHIBIT 4

DECLARATION OF DEONDRE WILLIS

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

1. My name is Deondre Willis. I am 24 years old. I am currently incarcerated at the Metro West Detention Center in Miami, Florida in cell 2C2. I have been in jail since late 2019.
2. I suffer from epilepsy and have had over 20 seizures in jail already. Every time I have a seizure, I feel weak and need to sleep the rest of the day. I've had to be transported to Jackson Hospital multiple times due to my seizures.
3. I know about coronavirus only because of the news and by talking to friends and family. We watch the news all day to try to get any information and guidance we can. Corrections doesn't give us any information or instructions about it. They haven't made any announcements. The most any officer has told us is to just wash our hands. I don't even know if anyone in the jail has coronavirus. I heard that an officer in Turner Guilford Knight has it, but I don't know if that's true.
4. I feel like my life is in danger in here because of coronavirus. I hate being in here because I see and hear people coughing around me all day. There are constantly new people coming in and out of the jail -- officers, medical personnel, and new people coming in from the streets who are coming from Turner Guilford Knight -- and we are just here, trapped, and don't even know if the people around us are infected.
5. I'm worried about how coronavirus is going to affect my epilepsy. I know if it gets over here, I won't be able to protect myself from it because we're all so close together and nothing is sanitary. And when I get afraid or too excited, that's when I catch seizures.
6. The medical service here is so bad. Corrections only takes you out of the cell if it is really bad, like if someone has seizures. If we have another issue, like symptoms of coronavirus, you have to request to go to the medical wing. Even if you request to go to the medical wing, you have to put in a sick card and wait at least 2-3 days to hear back. Medical isn't making people go down to get their temperatures taken. I saw a paper saying they're only taking care of emergencies. They said if it isn't serious, don't write a sick card.
7. It is impossible to stay away from people in here even though I try as much as I can. I live in a cell with 68 people. I sleep right next to another person, probably about one foot away from the person beside me and one foot away from the person on the top. I sleep next to an old man who is more than 60 years old, and he just eats and coughs all day. I

always tell him to cover his mouth and go to the doctor, but he won't. He still hasn't gone to the doctor, and no one has come up to check his temperature or to test him for the virus.

8. We all share six phones and one water cooler. There are 6-8 tables in the common area, which also has two televisions. Everyone uses the same remote. In the common areas, everyone uses the same cards and dominoes every day. Corrections made the trustees wipe everything in the cells down about two weeks ago, but that area hasn't been cleaned since.
9. There are 6 toilets, and there are always lines of people waiting to use them. The bathrooms are never clean. There are only three working showers for 68 people, and two of the showers are boarded up. The bathroom floor is always filled with standing water, which is disgusting.
10. Phones aren't cleaned. To use the phones, we wrap a shirt around the phone to protect ourselves. The trustees clean the cell at shift change and at that time, they spray down the phones. But, there are 60-70 men using the phones, so as soon as they clean it, people line up to use the phone back to back. That cleaning isn't enough to keep all the common areas sanitized given the number of people who are constantly crowded together, using everything throughout the day.
11. We have to drink out of the same water cooler. I try to press it with my elbow, and we all drink out of that together. I hate touching the sinks in the bathroom, and I try to put a whole lot of toilet paper on the toilet before I use it, when toilet paper is available. We don't have anything to protect ourselves, not even hand sanitizer. We don't have toilet paper. We don't have gloves. All they give us is a thin bar of soap. The laundry has been broken and was finally hooked back up today.
12. It's very cold in here, so people walking around with their hands in their pants all day.

This declaration was orally sworn to by Deondre Willis on April 3, 2020 because the Metro West Detention Center is currently not permitting documents to be exchanged for signature.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Deondre Willis on April 3, 2020.



By:
Maya Ragsdale
Date: April 3, 2020

EXHIBIT 5

DECLARATION OF BAYARDO CRUZ

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

1. My name is Bayardo Cruz. I am 30 years old. I am currently incarcerated at the Metro West Detention Center in Miami, Florida in cell 2C2. I have been in jail since May 22, 2019.
2. I am in fear for my life due to coronavirus because I have moderate asthma and chronic bronchitis. Recently, I have had a dry cough. People are coughing around me all the time, and some people look like they're really sick. There are no routine check-ups for anyone, and people who are coughing aren't being tested or getting their temperatures taken to see if we're carrying the virus. I am really scared.
3. Despite how bad the situation seems from the news, Corrections isn't doing anything to protect us. They haven't given us any guidelines or information about how to stay safe in these times. They haven't made any announcements. The most they did was put a memo on the wall saying that court was cancelled and that there is mandatory yard time. Many people in the cell with me can't read, so they can't even understand these memos.
4. Corrections also hasn't given us any information about whether anyone in Metro West has tested positive for coronavirus. When I asked officers if anyone has tested positive, they told me that no one in Metro West has been affected by the coronavirus. In general, they act like they don't want to talk about it. But, I have heard rumors that there are entire cells in Metro West that are on quarantine without any access to commissary, because one of the inmates in the cell tested positive for coronavirus.
5. We live in very close quarters, which makes me especially concerned for my safety. There are more than 50 people who live in the cell with me. The way our cell is set up is like a small gymnasium with beds all along the outside with a 10 foot by 10 foot area in the middle. The bunks are side by side, only 1-2 feet away from the next bunk, and 2 feet away from the top bunk. The common area in the middle has two TVs (one in Spanish, one in English), and multiple tables and chairs. There are at least five people in front of each TV at all times, and people sit at the tables playing dominoes. We can't get more than an arms-length of distance from other people at any time.
6. Given how packed my cell is, I can't get distance from new inmates who are recently arrested and might have coronavirus. There are new people coming in and out constantly.

We don't know if new people coming in have it, or even if officers have it -- we have to be worried about them too. The courts are closed and they aren't transporting us to hearings anymore. Yet, new people are coming into the cell every day. If they are going to stop transporting us out of the jail, they should stop transporting new people into the jail too.

7. In terms of our general safety, Corrections is doing nothing to protect us. Our cells aren't sanitized. Corrections doesn't hire janitorial staff to clean or sanitize the facility cells or hallways. They say that we have to clean our cells by ourselves. I am a trustee in the cell, meaning that I have been assigned to help keep our cell clean. I do the best I can with what I'm given, but the chemicals they provide for us are really watered down and don't sanitize the areas we're cleaning. We don't have bleach. We don't have face masks. I am scared and am trying to find the best way to protect myself and the people who I live with.
8. To get products that are actually hygienic, we have to buy them. People who don't have money for commissary get one hygiene pack per month, which includes a small soap that doesn't sanitize, one pen, one envelope, one stamp, one deodorant that doesn't work, and one comb. They don't provide us with anything to protect ourselves such as gloves, face masks, or hand sanitizer, and these items aren't available through commissary either. They started to give us more state soap recently, which aren't antibacterial. I have to spend about \$30/week to order my personal hygiene products, including antibacterial soap.
9. On top of that, we share just a few toilets, sinks, and showers between more than 50 people. There are ten open toilets in the back, but two are broken. There are seven phones, but one is broken. Each time I use a phone, I put a sock over it because phones aren't cleaned between each use. There are three showers for all of us. There should be five showers, but two are boarded up (and have been for the entire time I've been in this cell). There is usually a line of at least 6 people waiting to use the showers, standing right next to each other. The showers aren't cleaned between uses, and they're dirty. The only time they're clean is for the first person who uses them. You never know what the person who was in the shower before you was carrying.
10. We all get water from the same small water cooler, where you have to press a button in order for the water to come out. That button is always dirty, and so I try to protect myself by putting my shirt over my finger before I touch it.

11. Our laundry machine is broken, so we have been hand washing our clothes using the state soap, which is not antibacterial. We were told they put a work order in, but in my experience, things take at least a month to get repaired.
12. On top of that, the ventilation in the cell is bad. The air is really dusty. The filters are dirty, and the floors are always dusty. I have never seen maintenance clean the filters or change them.
13. They do pat downs of us when we come back to the cell after rec time, but don't change gloves between touching each person.
14. I am trying to take as many precautions as I can to protect myself and others around me, but there is only so much I can do.
15. I attempted to file a grievance on April 1, 2020, but Corrections said they did not have any forms. I asked them to talk to a corporal outside, but they said they didn't have one either.
16. This is a serious situation and I hope somebody takes this matter into their hands.

This declaration was orally sworn to by Bayardo Cruz on April 3, 2020 because the Metro West Detention Center is currently not permitting documents to be exchanged for signature.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Bayardo Cruz on April 3, 2020.



By:

Maya Ragsdale

Date: April 3, 2020

EXHIBIT 6

DECLARATION OF RONNIEL FLORES


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

1. My name is Ronniel Flores. I am 23 years old. I am currently incarcerated at the Metro West Detention Center in Miami, Florida in cell 2C2. I have been in jail since January 12, 2020.
2. I have asthma and Type 1 diabetes. Per my jail schedule, I am supposed to get insulin shots at 4 a.m. and 4 p.m., but my blood sugar has been all over the place since I've been incarcerated. It's been spiking to more than 600. The medical staff at the jail has been totally unconcerned. When my insulin spikes, I've been told by nurses to go back to my cell because it's not time for my shot. If I were not incarcerated, I would have insulin available to me at all times. Without insulin, I could go into a diabetic coma.
3. Since the coronavirus outbreak, I have been too worried to go to some of my 4 a.m. insulin sessions because the clinic is so crowded at that time with diabetics from everywhere in the jail. All the diabetics are supposed to go to the clinic at the same time, and everyone is crowded into the same small room as we wait to get our shots. We aren't given masks or gloves, and I can't get far enough away from people to stay safe. We sit right next to other inmates, side by side. Nurses do not take our temperature when we go to the clinic to manage our diabetes.
4. I started having difficulty breathing on Monday, March 30th. I put in a doctor's request, but it takes 2-3 days before someone even sees the request, and in my experience, it usually takes a week before I'll actually be called down to see anyone in the clinic. Today, which is Friday, April 3, I still haven't been called down to see the nurse. No one is taking our temperatures in the cell or doing any other kind of testing. The last time I had my temperature taken was when I saw a doctor two months ago. That is the only time my temperature has ever been taken.
5. Every day, there are new people added to my cell who have come in from Turner Guilford Knight, which is where people are processed when they first get arrested, and a lot of them are coughing. I've asked them whether they were tested before they were transferred to Metro West and they told me that they haven't been. There are also a lot of new officers in the cell. Before coronavirus, there used to be the same guards in our cells every day. Now, new officers come into my cell who I am not familiar with. Any one of the people who come in and out of our cell could bring the virus in and there's nothing we can do to protect against it.

6. My cell is so crowded that it feels like a health hazard. There is no way for me to stay away from other people, even though I try. There are about 65 people who live in the cell with me. The beds are about an arms-length away from each other. Today, Corrections put up a sign saying that we should sleep head to foot instead of head to head, which still doesn't leave 6 feet of space away from each other. There are tables in a small common area inside of the dorm, where people sit right next to each other. People are also crammed together during rec time outside, where we play basketball.
7. We have to share everything in here. There are 7 phones in our unit, shared between all 65 of us. The phones are cleaned once at night. It isn't safe to touch those phones, so I put a sock over the phones every time I use them to protect myself. We share showers, toilets, and sinks. None of the things that we share are cleaned between uses, and anyways, Corrections doesn't clean, they have inmates clean with watered down products.
8. We don't have any of the cleaning products necessary to protect ourselves from the coronavirus. We don't have real soap. We don't have hand sanitizer. We don't have paper towels. We're out of toilet paper. The laundry machine is broken, so we have to wash our clothes by hand with state soap. Yet, there are so many things around us that could transmit infection, because they are constantly touched by other people in here, like the TV remote and the button to get water from the water cooler. I have never seen those things cleaned, and so I use my uniform to press those buttons.
9. Corrections doesn't give us any information about the coronavirus, not even telling us if other people in the jail have tested positive for the virus. I heard that the third floor is on quarantine and one entire unit has been shut down. I also heard that three officers in TGK have it.
10. We're stuck in here without protection.

This declaration was orally sworn to by Ronniel Flores on April 3, 2020 because the Metro West Detention Center is currently not permitting documents to be exchanged for signature.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Ronniel Flores on April 3, 2020.


By:
Maya Ragsdale

Date: April 3, 2020

EXHIBIT 7

DECLARATION OF PETER BERNAL

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

1. My name is Peter Bernal. I am 35 years old. I'm a single father of two. I am currently incarcerated at the Metro West Detention Center in Miami, Florida in cell 1D3. I have been in jail since February 2, 2020.
2. I am writing this declaration to express my fear of the pandemic that is affecting us all, but particularly those of us who are incarcerated in jails in Miami-Dade County. I am writing as an inmate who is diagnosed with chronic asthma, which causes severe respiratory problems. As such, I am at high risk if I come into contact with the coronavirus.
3. I feel that I am in a petri dish for growth and contamination.
4. My declaration is based on my current knowledge of the coronavirus. It is important for me to note that my information is entirely based on what is being said on television and conversations with my loved ones outside. The Department of Corrections has not educated us sufficiently about the coronavirus or how to take precautions. When I ask correctional officers about the virus, they give me excuses about why they can't answer, including that they are not permitted to tell us. I haven't been told whether there are confirmed cases of coronavirus in the facility. I heard rumors that there were positive cases that were identified in Metro West, and that entire cells are on quarantine in the facility. We don't know why they're in quarantine -- I just heard that someone saw a sign on the door that says "quarantine."
5. We as inmates do not have access to the medical care that is required to keep us safe. Corrections isn't taking steps to test anyone or take people's temperatures, even when people are displaying symptoms. We need to have our temperatures taken consistently and for people who are confined in our cells to be tested. It's scary for us because there are people coming in from the outside who are coughing in our confined environment where there is no air circulation. Air filters in the cell aren't changed.
6. There are people coming into the cell constantly who place us at risk. Nurses and correctional officers come from the outside, and oftentimes aren't even wearing gloves or masks. When they are, they don't change their gloves or masks when entering from another cell.

7. I've been seeing a lot of people who are coughing in the cell. If we [people who are incarcerated] see someone coughing, we tell them to fill out a medical request form. When people do fill out a request form and go to the medical unit, they report back and tell us they were just given a pill as part of a cold pack with no testing.
8. Last week, I felt irritation in the back of my throat, so I filled out a request. Usually, it takes two to three days to be seen, but with everything going on with the coronavirus, it's been taking longer than usual. When I finally was called down to the clinic, they didn't take my temperature. They just gave me tylenol as part of a cold pack. They didn't administer any tests.
9. As an in-cell trustee, I see how it is impossible to sanitize the cell. We lack cleaning supplies and equipment. It is difficult to get detergents to clean and to get equipment to clean up with, like mop heads and mop sticks. There is also a shortage of gloves. Sometimes we get gloves, sometimes we don't. We try as much as we can not to reuse gloves but we can't help it because of the shortage. When we have to reuse gloves, all we're doing is carrying bacteria around.
10. Part of my duties as a trustee is to serve food. Food is transported from different facilities without proper sanitation. Sometimes we are being told to serve food without gloves, which means that we are required to open the trays and check the food in them with our bare hands. For example, on February 31, 2020 at around 3:40 pm, one of the officers came into the cell as we were receiving our dinner trays to pass out. He informed us quietly that they were out of gloves, but told us that we needed to keep preparing the trays. I prepared the trays with my bare hands.
11. When I'm not doing my duties as a trustee, I stay in my bunk to try to avoid contact with other people, but it is impossible to practice social distancing. The cell is set up as a day room, and the bunks are lined up around the wall. There is about two feet between bunks. The person who sleeps on top of you in the bunk bed is about three feet away from you. Correctional officers have a paper sign up saying to sleep opposite of the person next to you, but even following that procedure does not allow us to have six feet of distance.
12. According to an Inside Edition Report I saw on television, when someone coughs or sneezes, their mucus could travel up to four feet. Despite the fact that there are 32 people in my cell instead of the usual 60-70 people, we still can't maintain more than a couple of feet of distance from each other. In order to maintain the proper distance of six feet, there

would have to be a maximum of 15 people in our cell at a time. Why doesn't the social distancing that people are urged to practice outside not apply to inmates?

13. We share everything in here. Where we drink water from, an orange water cooler, is touched by every inmate without being able to sanitize it between uses. There is a very small common area in the middle of the cell. In the common areas where we sit, we are unable to sanitize it due to lack of supplies and chemicals. The limited number of phones we share aren't cleaned between each use.
14. I have tried to fill out grievances, but I haven't been able to because of the lack of grievance forms in my cell. We get grievance forms from our counselor, who appears between one and three times a week. When the counselor comes and we ask him for grievances, he just says that "I'm working on it, I'm working on it" and then does not provide the grievance forms.
15. I feel worried because at least when you're out there, you can control your diet which is really important. I'm a chef and I make sure I cook foods that keep me healthy and help with my immune system. In here, the food is unhealthy.
16. I firmly believe that we as inmates are not being protected adequately. We are not given the same chance to prevent contamination and avoid spreading the virus as people outside are. I cannot express enough how scary this experience has been for me.
17. I am writing this declaration not only to raise awareness but to be given the same fair chance of surviving this pandemic that is affecting everyone worldwide. As a firm believer that all lives are equal, I am begging for the Department of Corrections to take action to protect us.

This declaration was orally sworn to by Peter Bernal on April 4, 2020 because the Metro West Detention Center is currently not permitting documents to be exchanged for signature.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Peter Bernal on April 4, 2020.



By:

Maya Ragsdale

Date: April 4, 2020