

EXHIBIT K

Declaration of Zain Hussain

I, Zain Hussain, declare as follows:

1. I have been incarcerated at Cybulski since June 1, 2018. I am 43 years old. I am housed in E block, which houses the Second Chance Program. I have completed all the programming they have asked me to and more. To my knowledge, there are close to 100 housed in this block.

2. I am a kitchen worker at Northern. I have done this job for 19 months. I usually wake up at 3:30 a.m. and go in to Northern from 4 a.m. until 11 a.m., seven days a week. Last June, I switched to second shift, which is 11 a.m. to 5 p.m., also seven days per week.

3. After Sunday, March 29, we stopped going to work at Northern. When we were leaving to go to Northern that day on second shift, a kitchen worker was coming back from first shift and sweating bullets. They took his temperature, which was 103.7. They still sent us to work at Northern that day, but that was our last day of work.

4. The first people to get sick in E block were taken out on March 30. There was one guy taken out with a fever of 104. He was really sick. They started moving them from E block to another block, H block, which is usually the intake block at Cybulski. Even though they were sick, they made them clean out the block. They then put them in seg, two to a cell. They were in there for days, unable to take a shower. Then they moved them to Northern.

5. People continue to be taken out of my block because they are sick. There were a couple people taken out of E block in the last week. The two people that they took out last Friday, April 10, were pretty bad. They had fevers and looked like death. I know

some people have been hospitalized at UCONN.

6. They were doing temperature checks for a week, checking temperatures once per day, but then they stopped. The last time they did it was April 11.

7. I asked a medical worker if I could be tested for COVID-19. She said I could, but that if I wanted to get tested, I would have to pack up my stuff and go wait in H block with everyone else who had been tested to wait for the test results. So I would be put in with a bunch of other people who are definitely sick with fever, while I waited for my result. I decided not to.

8. A guy yesterday had chest pains and got a rapid test. He works for the laundry department here. He said he wasn't scared of Northern. In 10 minutes they told him he had the antibodies but you're not positive any more. He's back in the block now.

9. There have been 10 or 11 guys so far who have come back from Northern. They haven't been retested for COVID-19, to my knowledge. They just bring them back when their symptoms are gone and don't have fevers. Some people still haven't come back.

10. I have asthma and diabetes. I have two asthma inhalers. I had pneumonia twice in 2017. I have never been higher than a Level 2 inmate here.

11. There's no social distancing here. If I use the microwave or toilet, someone goes and uses it right after me. They are serving food to us right in the block. We eat on our bunks or on tables. The block is one big room with cubes for sleeping around the outside. There are 15 cubes, with eight guys to a cube. Each cube has four bunk beds, about four feet apart. We share one bathroom with three urinals and four stalls. We share six or seven showers. The tiermen clean twice a day. If I use the phone, I

clean it with stuff that looks like windex.

12. COs started wearing masks after a couple of them caught the virus. I wear my mask most of the time, but I wonder what the point is because you can't social distance in here. The mask is a tan material, the same as our pants.

13. I understand we all broke the law. The in people here are trying. They gave us some bleach for a time, then lemonall products and glass cleaner for the phones. But what is the point of keeping us in here like this when we're all on top of each other. Put us on an ankle monitor and let us out. I have a house to go to. I have a home where my fiancee has never been in trouble, in Connecticut, and a job waiting for me.

14. I declare under penalty of perjury that the foregoing is true and correct. I would testify to the same statements above if called to do so in court.

15. I have authorized Elana Bildner to affix my signature to this declaration for me, because I am incarcerated, and it would take a minimum of seven days for me to receive a document in the mail, sign it in front of a notary, and return it by mail, assuming I could do so.

Executed this 17th day of April, 2020.

Zain Hussain

by  _____