

EXHIBIT L

Declaration of Roger Johnson

I, Roger Johnson, declare as follows:

1. I am incarcerated in the E dorm of Cybulski. I will be 55 on April 29 of this year.
2. In prison, I work as a detail worker at Northern, meaning I am transported from Cybulski to Northern in order to clean that prison.
3. When I was cleaning in March, I was not protected at all. I had a pair of rubber gloves, but no mask or hazmat suit or anything.
4. March 28 was my last day of work at Northern. One of the kitchen workers in Northern had tested positive for COVID-19, so they stopped taking us to work.
5. They checked my vital signs back at Cybulski on March 30. I had a high fever. The nurse looked at me strangely and left. I stayed in the unit for a few hours. A couple hours later I was called out with two other individuals. We took COVID tests and then sat there for hours waiting.
6. After a few hours, we were moved to H dorm at Cybulski. We had to move our stuff out ourselves. Then they sent us down to H dorm with bleach and forced us to clean it out ourselves, even though we were all sick. This made no sense. They knew this virus was coming and they knew this would happen way ahead of time. They could have done this weeks ago. Instead, they waited until it actually occurred and then sent sick people down to clean up the dorm.
7. The three of us from E dorm were in H dorm for a week. Once we tested positive, they put us in seg. It's a small cell behind the captains' and lieutenants'

building. The ventilation system there is really bad. I was put in seg with another guy from E dorm. The cell had mold all over the ceiling. I started to complain—I have respiratory issues and it was terrible. There was a toilet in the cell, but I was in there with another guy and there was no privacy. We weren't allowed to leave to use the phone to call, not even to call our emergency contact that we were sick. The COs were trying to avoid the area. The nurses were calling us "little Covies" even before we got our test results. There were guys who had gotten sick before us in E dorm, and they were stuck in a seg cell for 10 days.

8. I started to get upset. I made two requests to mental health before they finally came. A person from mental health came with the nurse and two lieutenants. As I was expressing my concern, she said "People are dying. People are dying." I said, "well, you're trying to kill me." The lieutenant told me you requested to speak to mental health because of this? I said of course, look at the conditions. It was like a joke to her. I just felt like an animal, the way they did this. And even though it was a quarantine area, staff kept coming through to see who was in the cell and breaking the quarantine.

9. The nurse told me I would be leaving soon. I was transferred to Northern the night of April 7, around 10:30 p.m. I was transported in a regular van, with a bunch of other people.

10. When I got to Northern, they took our vital signs—temperature and blood pressure. Then they put us each in a cell for five days, in 2West. I was put in cell 202. We weren't allowed to leave our cells at all, except for one phone call.

11. There were guys close to me from Cybulski. There were guys downstairs from Corrigan and Radgowski. There were some from HCC and Cheshire, all around the

state. There were people in all the cells. I think 2W and 3W were both full.

12. I heard coughing. Some guys were taken out on stretchers and wheelchairs. It was a really sad situation. Staff were wearing hazmat suits.

13. There were two nurses on each shift who took vitals. There was a CO who went around every 30 minutes. That was it. There was no specialized medical care or anything that I saw. I had my property with me. They didn't give us any cleaning supplies—just whatever you already had. I didn't take a shower for two weeks. When I asked why I couldn't take a shower, they said if we took a shower we would get the virus in the air.

14. People starting kicking their doors trying to get a phone call. After three days, they finally let us have one call. I called my mom. That was the only time I got out of my cell when I was at Northern.

15. I was in Northern for a total of five days. After five days, we were told that we would be going back to H dorm at Cybulski. We were also told that before we got back, they would test everyone in E dorm for COVID-19 with new tests. We were supposed to leave Monday, but they took us out early, on Sunday, after taking our temperature.

16. Instead, when we got back to Cybulski, they put us back in E dorm. They told the other people in E dorm we were "cleared," but we didn't have another COVID-19 test, or test negative, or anything like that. Everyone was worried about us being back here. Right now, there are 112 guys in the block and they are not practicing social distancing. You can't.

17. When we got out of quarantine at Northern, there were people already

coming in to take our spots.

18. When I got back to E dorm, guys were taking Tylenol and aspirin to try to hide fevers so they wouldn't get moved out to Northern. Nobody wants to go there. Meanwhile, a lot of guys I know are telling me they probably have the virus because their bodies are aching, they lost their smell and taste, but they don't want to get tested. Still today, in here, you got guys doing a lot of coughing. There's one guy who is overweight, he doesn't look good at all.

19. Recently, staff actually stopped bringing in aspirin so people can't take it any more. But they also stopped taking our temperatures. So everyone is still in here, no vital signs, nothing. There's still no special cleaning. They stopped giving us bleach—just some stuff that looks like bleach. Whoever feels like cleaning, cleans.

20. The officers have a desk here that's right near the counselor's office. They put up tape so that we stay six feet away from it, even though they're sitting up high on an elevated platform. But that just takes six feet of space away from us, so we're all closer together.

21. I'm trying to stay on my bunk and stay away from other people, but it's hard. I wear my mask all the time. It's giving me a sore on my nose. While I was sick, I had a cough for two days and the fever. I am feeling better, trying to get my lungs back, a little weak. I heard someone died. This is scary situation for me. I'm at the end of my bid. To experience this now, it's scary. I don't know what's going to happen next.

22. As we speak, a guy is moving out of my dorm. He requested to be tested and they just moved him to H block. He just packed up his stuff and walked down the hall. There was another guy last night who requested to be tested and they said it came up

positive for antibodies, but they put him back in the unit. This guy is still walking around the cube, with no mask.

23. It's clear to me that DOC did not have a plan for this. They didn't know how to deal with this. It is just crazy.

24. 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.

25. 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.

Executed this 17 day of April, 2020.

Roger Johnson

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