

EXHIBIT O

Declaration of Kezlyn Mendez

1. I am an adult.

2. I have been incarcerated at MacDougall Walker Correctional Institution on and off since 2014. I am 33 years old. I am housed in N pod. To my knowledge, there are around 66 people housed in N pod.

3. We are not on lockdown, but our movement is restricted. We get three hours and 30 minutes total out of cell per day. We use our time out of cell to shower and use the phone. We can also play cards, chess, and dominoes. We are allowed to go outside and play basketball. There is no social distancing when we are out of our cells.

4. I am in a cell by myself. My sleeping area is not cleaned or sanitized by staff. I am provided with diluted cleaning supplies to clean my own space.

5. We eat meals in the dayroom of the unit. During mealtimes, we are spaced about a foot apart.

6. The staff do not provide us with soap. When I have needed soap in the past two weeks, I have gotten it from commissary for a fee. I sometimes cannot buy other items I need from commissary so that I can afford soap. I do not have access to hand sanitizer.

7. I do not have a shower in my cell. I share eight showers with approximately 12 other people. On the tier below me, roughly 40 people share eight showers. The showers are typically cleaned three times per day. The showers are cleaned with diluted cleaner. The showers are not sufficiently clean.

8. I also share eight phones with my entire unit. The phones sometimes get used about 50 times in between cleanings. I put a sock over the phone before I use it to protect against germs.

9. I work as a barber, and I am still expected to work. I try to wipe down all of my equipment in between each haircut.

10. Since the onset of the coronavirus pandemic, I have observed some staff wearing masks. I have not observed staff wearing gloves.

11. Several staff members in my facility have tested positive for COVID-19. I saw one of these staff members standing within a foot of someone who was incarcerated.

12. Staff have not provided me with guidance about how to protect myself and others from coronavirus transmission. They provided me with a used cloth mask about two weeks ago.

13. I have not come into contact with anyone who has tested positive for the coronavirus. However, there are people in my unit who were recently transferred from another prison where they lived in an open dormitory with someone who tested positive. I have come into contact with people who have been coughing.

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 Wynne Muscatine Graham to affix my signature to this affidavit 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 15th day of April, 2020.

Kezlyn Mendez
by [Signature]