

EXHIBIT Q

Declaration of Luis Pagan

1. I, Luis Pagan, declare as follows:
2. I have been incarcerated at Northern Correctional Institution since June 2017. I am 34 years old. I have asthma and an autoimmune disorder. I am currently housed in 1 East unit at Northern. To my knowledge, there are about 40 people housed in my unit.
3. I get 1 hour out of cell per day for recreation and 15 minutes to shower. Rec is in outdoor cages with 8 people at a time. Prior to the pandemic it was 6 people at a time. Since the pandemic started, they've added 2 people who were transferred in from Walker to my rec, and now it is 8 people at a time. Rec takes place in 3 cages, one of which is approximately 5 feet by 9 feet, and 2 of which are smaller. 4 people are in the larger cage and 2 in each smaller cage at the same time.
4. I don't have a cell-mate, but 2-3 officers enter my cell per day to take me to rec, the phone, or the showers. It is not the same 2-3 officers each day.
5. My sleeping area is not cleaned nor sanitized by staff. We are provided cleaning supplies to clean our own spaces on Saturdays, though it is not enough supplies to last throughout the week because the officers keep coming in and out of my cell.
6. I eat my meals in my cell. The guards who bring my food are wearing gloves, but they do not change their gloves between holding our food and touching unsanitized handcuffs.
7. The staff have provided us with one bar of soap since the pandemic started. Other than that, when I've needed soap in the past two weeks, I've gotten it from the commissary for a fee. I do not have access to hand sanitizer.
8. I do not have a shower in my cell. I share a shower with approximately 40 other people in

the tier. There's a single slot in the shower that everyone's towels sit on, and towels are not laundered between showers. I also share 4 phones with my entire unit. Handcuffs and shackles are used repeatedly throughout the day, and are not sanitized between uses.

9. Since the onset of the coronavirus pandemic, I have observed staff wearing masks and gloves, but not gowns. My temperature has been taken a few times in response to an unrelated infection, but staff are not consistently taking inmates' temperatures despite the fact that I was informed by a correctional officer that a kitchen worker at Northern has tested positive for COVID-19.
10. Staff have provided me with guidance about how to protect myself and others from coronavirus transmission. They have provided me with two pieces of paper encouraging us to wash our hands and clean our cells. However, it is difficult to follow the advice about sanitizing because we don't always have LEMONALL, the provided cleaning material, and correctional officers are constantly coming in and out of our cells. They have provided me with one mask made out of cloth on approximately April 1st.
11. I have come into contact with approximately 6 correctional officers in the past week who have been coughing and sneezing. They have continued to work as normal and told me "it's just allergies."
12. People at my facility have tried raising concerns with prison staff about their handling of the coronavirus. They ask for more cleaning supplies, they ask staff to wear the DOC-issued masks instead of the smaller, thinner ones many are wearing, and they ask staff to change their gloves. Prison staff have responded by refusing to give more cleaning supplies, saying that it's too hot to wear the larger masks, and refusing to change

their gloves. As a result, many inmates are refusing to leave their cells, including to shower, because they are concerned about the staff's gloves.

13. When I seek treatment for a medical condition, it is usually a significant wait to see a doctor. When I sought treatment for a root canal, it took from September to January to see a doctor. I'm currently waiting to see a doctor for knee pain and a lump in my knee. It's been a month and half since I first started requesting treatment and I haven't received treatment yet.
14. People are no longer being pulled out of cell for mental health counseling, which previously happened once per week for people receiving mental health treatment.
15. 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.
16. I have authorized Madeline Batt 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 8th day of April, 2020.

Luis Pagan

by  _____