

EXHIBIT R

Declaration of Johnathan Pape

I, Johnathan Pape, declare as follows:

1. I have been incarcerated at Corrigan since May 2019. I am 27 years old. I am housed in B Unit of Corrigan, and I have been here for about a year. To my knowledge, there are approximately 100 people housed in my unit.

2. On March 30th, my cellmate said that he had a headache and asked the correctional officer to go to the nurse. The COs said that he had a sore throat. When he came back from the nurse, staff said that he had to be quarantined and that I had to be moved to quarantine with him.

3. When they said I had to move and I asked the nurse, “why am I being moved? Why do I have to quarantine if I don’t have any symptoms?” The nurse said I could take it up with the Lieutenant, but refused to call the Lieutenant down.

4. The next morning, a correctional officer (CO) came to move us to the cell where we’d be isolated. The CO said that if we refused to move, we’d be taken to segregation.

5. We moved from our normal cell, 222 which is in a corner, down a couple of cells 225, which is in the middle of the tier, on its own tier. The new cell looked like a standard regular cell, identical to our normal cell. It had a bunk bed, toilet, desk, and window. The most space my cellmate and I could have from each other was four feet. We were always bumping into each other when we walked around the cell at the same time.

6. Other inmates regularly walked past our cell when going to showers or to use the phone. There was no trap so the COs would have to open the door when they brought us our meals. There was a gap between the cell door and the floor; it was enough to squeeze a book

through. We were easily able to talk to other inmates through this gap, so it didn't seem like there was any point in moving us.

7. The situation was bad, especially how we were treated when we were in quarantine. We were not allowed to leave the cell for any reason for 15 days. When we moved, no one told us that we'd be subjected to having no shower and no phone calls for 15 days. I'd never heard of being stuck inside a cell that long.

8. The whole time we were in quarantine, we didn't get new jumpsuits or new bedrolls. They didn't give us any tools or detergent to clean the cell for the whole 15 days. They never picked up our meal trays or any leftover food after we were done eating, and they only emptied the garbage one time while we were in there. It was disgusting.

9. We weren't allowed to use the phones to tell our families what happened. The COs rarely picked up and delivered our mail because they were scared to touch it. The main way we were able to communicate was by talking to other inmates through the gap at the bottom of the door. It was the only way that I could really be heard.

10. We didn't get much medical care while we were in the cell. Once per day, staff would come by and take our temperature and stick a device on our fingers.

11. I'd already been dealing with high blood pressure for a while before we went into the quarantine cell. Before going into the quarantine cell, the nurse would routinely take my blood pressure. No one took my blood pressure the entire 15 days we were in quarantine.

12. Prior to going into the cell, I had a skin rash. Medical had given me lotion for the rash, and the lotion ran out when I was in isolation. When I told the staff that the lotion had run out and that I needed more, a nurse came, looked at me through the door, and said I was fine. She

didn't come inside or touch me to examine the rash.

13. My cellmate never showed any symptoms of COVID-19 besides the headache. I never showed symptoms. The entire time we were in isolation, I never had a fever and I don't think my cellmate had a fever.

14. After 10 days of being in the cell, my roommate was tested for COVID-19 but they never told him his results. Someone came down to test him while I was sleeping, so I never got a test.

15. Even though he didn't show symptoms, I didn't like the position that I was being put in, being isolated with someone who supposedly already has this virus. I felt like it was cruel, that they were forcing it on me.

16. Now, I think that if people did get sick, they wouldn't say anything now that they've seen what happened to us. If they do get sick, they're going to hide it.

17. They treated us worse than animals.

18. 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.

19. I have authorized Faith Barksdale 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 22 day of April, 2020.

s/Johnathan Pape_____

by Faith Barksdale _____