

# **EXHIBIT W**

### **Declaration of Christopher Russell**

1. I, Christopher Russell, declare as follows:
2. I have been incarcerated at Northern Correctional Institution since Monday, April 20th. Prior to that I had been incarcerated at Bridgeport Correctional Center since approximately the 21<sup>st</sup> of January. I am 29 years old. I am housed in a block at Northern they are using for medical isolation, in a cell by myself. 6 people were transferred with me from Bridgeport to Northern.
3. At Bridgeport, prior to coming to Northern, I was in a cell block that housed 20 people. We slept less than 6 feet apart from one another, probably 3 or 4 feet.
4. We ate meals all together in the dayroom, less than 3 feet apart. All 20 of us were on top of one another.
5. Since the coronavirus started, we had our cells cleaned once. Our cells were supposed to be cleaned every Monday, but they weren't. We would ask for spray bottles and paper towels to wipe down tables and they wouldn't give us those.
6. Correctional officers had masks, but were wearing them around their necks. We were told they were optional and the correctional officers didn't have to wear them.
7. After my mother had told me the news was reporting that there were COVID-19 cases in the Department of Correction, I asked Correctional Officers at Bridgeport about it. They told me it wasn't true, and the news was lying.
8. I started feeling symptoms last Thursday, April 16<sup>th</sup>, and I told my block officer. He repeatedly told me he would call me down to medical but he never did. I was not sent to medical until Sunday, April 19<sup>th</sup>.
9. When I was sent to medical, they took my temperature. I had a fever but they didn't test

me for COVID-19. However, they sent me to a cell at Bridgeport with two people who had already tested positive. They left me in the cell for twenty-four hours with the two COVID-positive people.

10. After 24 hours in the cell, I was sent to Northern. I still had not been tested.
11. A day after arriving at Northern, April 21<sup>st</sup>, I was tested for COVID-19. They have not yet told me the results. When I asked the medical staff, they did not respond. They pretty much just looked at me and walked away.
12. At Northern, I am in a cell by myself. I get 30 minutes out of cell per day to make two phone calls.
13. I can't shower at all while I'm here. I have no access to recreation. I have no access to my property. I cannot order commissary. I feel like they are punishing us for having COVID-19.
14. I was given a care package of a toothbrush and toothpaste, soap, and shampoo when I arrived at Northern. But it's not very useful because we can't shower. If we want to wash, we have to do so in the sink, which is not clean.
15. At Northern, the CO's are wearing masks.
16. The cells are disgusting and dirty. The toilets and sinks are all grimy. There's toilet paper with urine on it on the floor of my cell. It looks like the cells have not been cleaned in a while.
17. The cells are made of solid concrete and freezing cold. This has made it hard for me to sleep and breathe. I have asthma and the cold air makes it hard to breathe.
18. When I arrived at Northern, I did not have my inhaler. I only got it back last night after I woke up in the middle of night and told them I couldn't breathe. There is a buzzer I can

press in the cell, but I couldn't get up to press it because I couldn't move or breathe. I couldn't do anything until a CO came around on tour. I asked him to call medical, but he didn't do so immediately. Medical didn't come until after his next tour, fifteen minutes later.

19. The only medical care I receive here is Tylenol and Mucinex. Neither of them help. They take my temperature and blood pressure twice per day. They have not told me what would happen if my fever was too high.
20. Medical staff have told me I can leave Northern 14 days after arriving.
21. 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.
22. 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 22<sup>nd</sup> day of April, 2020.

Christopher Russell

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