

EXHIBIT Y

Declaration of Anthony Toscano


1. I, Anthony Toscano, declare as follows:
2. I have been incarcerated at Willard-Cybulski Correctional Institution since November 2019. I am 30 years old. I am housed in A dorm of Willard-Cybulski. To my knowledge, there are 75 people housed in my unit. Usually, my unit holds a little over 100 people, but many people have been transferred out recently, a lot of whom have been sick.
3. Right now, I get 20 minutes out of the dorm per day of outdoor recreation with 9 other people. I also use shared phones and showers that are located in the dorm.
4. In my dorm, we sleep approximately 2 feet apart. Our sleeping area is not cleaned nor sanitized by staff. We can request cleaning supplies to clean our own spaces.
5. I eat my meals in my dorm. During mealtimes, we are spaced less than six feet apart.
6. The staff initially did not provide us with enough soap, but less than two weeks ago started giving us soap more consistently and now I have enough.
7. I share 9 showers with approximately 75 other people in the unit. I also share 6 phones with my entire unit. The phones and showers are typically sanitized once per day.
8. Since the onset of the coronavirus pandemic, I have observed staff wearing masks and gloves, though not all of the staff wear them.
9. Staff have provided me with a one-page pamphlet guidance about how to protect myself and others from coronavirus transmission. They have provided me with two masks made out of cloth in approximately the first week of April.
10. I have come into contact with at least 3 people in my facility who have shown symptoms of coronavirus. They were removed from the facility, but none of their spaces were

cleaned. We were not told what happened to these people.

11. In my unit, people are asking staff for more information, but we keep getting different responses from different correctional officers.
12. 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.
13. 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 14 day of April, 2020.

Anthony Toscano

By  _____