

EXHIBIT Z

Declaration of Joshua Wilcox

I, Joshua Wilcox, declare as follows:

1. I have been incarcerated at Cheshire Correctional Institution since January 2020. I am 27 years old. My sentence ends on May 27, 2020.

2. I was housed in South Block-5, a general population unit, until Monday. To my knowledge, there are about 100 people housed in my unit.

3. South Block-5 is double-celled, with two tiers. We are in our cells 22 hours a day. We get out once first shift and once second shift. When we get out, we are allowed to use phones or take a shower. We share 12 to 13 phones spread out around the dayroom. They usually aren't sanitized between uses, but they started giving us Lemonall and letting us clean them between uses.

4. The cleaning regimen in my unit is pretty much the same as it was before, except they don't let us do cell cleanup anymore. They usually would come in every week to let us clean out our cells, but since the pandemic, they don't let us do that anymore. Usually, on Wednesdays and Fridays, we were on lockdown for training purposes, and we would be able to clean out our cells during that time, but since the pandemic they stopped doing that.

5. We share six showers among the whole unit. Nothing is really sanitized after everyone uses it. There were a couple COs that had COVID-19 in Cheshire, but nobody in my block was sick that I'm aware of.

6. At the beginning of April, they passed out a bar of soap per person. As of Monday, they had not done it again. You can buy soap from the commissary but it's not antibacterial. It's the same price as it was before.

7. On April 2, they passed out masks. The warden had come in earlier and said we could all get gloves, but the COs said no, so we don't have gloves. We got a second mask about a week and a half ago. Some people are wearing them and some people are not.

8. About the half the COs are wearing blue cloth masks. The rest are not.

9. We still don't have any social visits. We are getting two extra phone calls.

10. 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.

11. I have authorized Elana Bildner 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 23 day of April, 2020.

Joshua Wilcox

by

