

EXHIBIT E

Declaration of William Bruno

I, William Bruno, declare as follows:

1. I have been incarcerated at Brooklyn Correctional Institution for almost four years. I am fifty years old. I am housed in D Dorm of Brooklyn CI. To my knowledge, there are 114 people housed in my dorm.
2. D Dorm has been in lockdown for about a month. The lockdown means that we don't leave D Dorm anymore to eat lunch with other dorms or to go to rec. We still go outside once or twice per day. Other than that, we spend pretty much all of our time inside D Dorm.
3. D Dorm is one big, open area. It has a single dayroom, which we can use from 8:00am to 11:00pm every day. That means that all 114 of us are in the dayroom at once. We play cards there and watch TV. Usually, we are about 1-2 feet away from each other. I have never been told by CDOC to "social distance" from other people, or to keep 6-8 feet between me and every other person. Even if I was told to do that, it wouldn't be possible because there is not enough space. I believe the total size of D Dorm is 120 feet by 65 feet. This includes sleeping areas and the day room, but not the showers. I believe these are the dimensions because the tiles on the floor are each twelve-inch squares, and I counted the tiles.
4. In D Dorm, we do not have cells. Instead, we sleep in "cubes." "Cubes" are separated from the day room by walls that are about eight feet high, and that leave a gap of around six or seven feet between the top of the walls and the ceiling. Each cube sleeps six people on three bunk beds. When we sleep, we are probably 2-3 feet apart from the people in the other bunks. There's probably about an arm's

length between the people who share a bunk bed. These measurements are my best guesses.

5. CDOC gave each of the prisoners in D Dorm two masks. The masks are made of a tan cloth that looks to me kind of like the “inmate prison tans,” and are lined with cotton. CDOC told us that we can use the masks at our own discretion. I only wear mine when I go out of D Dorm for medical visits, or when I am talking on the phone. I don’t wear my mask when I am inside D Dorm. Most other prisoners don’t either. I would guess that maybe 5% of people wear their masks when they are inside D Dorm.
6. The prison gives me soap. Usually, prisoners have to buy soap, but for about the last three weeks, the prison has been giving us bars of soap for free. They have told us to wash our hands often. I probably wash my hands a dozen times a day. I see other people in D Dorm washing their hands often as well.
7. D Dorm is cleaned three times per day by prison workers. They are supposed to clean the table tops too, but they can’t because they don’t have supplies. I clean on the third shift. I am still expected to do my job right now. If I refused to work, I would probably be written up for that.
8. Most of the guards wear masks all of the time, but some do not. Their masks are blue, but I think they are made from the same material as ours. A lot of staff wear gloves. I also see them using hand sanitizer from machine dispensers. Prisoners are not allowed to use the dispensers. Staff have also told us that they have their temperatures taken every day before they come into the prison. But I cannot verify that.

9. I have been on medicine for Hepatitis C, so, luckily, I am allowed to go up to medical every day. But for everyone else, it is taking longer than usual right now to get seen by medical. For example, we've been waiting for our flu shots for about three months, and we still haven't gotten them. The medical staff has told us that they haven't had time to give us all flu shots because they have been busy with other things. I do not know what the things are that they are busy with.
10. To my knowledge, I have not come into contact with anyone who has tested positive for coronavirus. I have not noticed anyone in my dorm with cough, fever, diarrhea, nausea, and / or vomiting. But I have heard that so far there have been seven people in B Dorm who have symptoms.
11. 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.
12. I have authorized Sophia Angelis 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.

William Bruno`

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