

EXHIBIT F

Declaration of Angel Caballero

I, Angel Caballero, declare as follows:

1. I have been incarcerated at Corrigan for a little over a year. I am 44 years old. I am housed in Bravo Pod ("B Pod") of Corrigan Correctional Institution. To my knowledge, there are 96 people housed in my unit.

2. Our facility has been on lockdown since approximately April 1. That's when I started keeping track. For a few days when the lockdown first began, we got 15 minutes out of our cell for rec. Beginning Friday, April 3rd we got no time out of cell for a few days after COs got into an altercation with an inmate.

3. Now we get at most 30 minutes of rec. Outside of our cells.

4. During rec, inmates can either take a shower or use the phone. There's usually no time for both. People have to choose between getting in touch with their loved ones and taking a shower. If you're not using the phone or the shower, then you can't come out of the cell.

5. On my pod, people are housed two-to-a-cell. They're allowing six people to take rec at once, releasing six people from three cells at a time. My cellmate and I have been taking rec with the same group of four inmates every weekday since at least April 5.

6. Since April 5, I've been coming into contact with about 13 people daily. This includes my cellmate, the four other inmates we encounter during rec, and then approximately eight different COs. There are four COs per shift, and they take three shifts every 24 hours.

7. I share my cell with one other person. It's six feet by nine feet. We sleep approximately three feet apart. We sleep in a regular bunk; I've got the top bunk and he's

got the bottom. There are two chairs inside the cells so everything is really tight. The furthest amount of distance that we can have between us while in the cell is nine feet.

That would require one person to sleep on the floor by the door.

8. COs pass our meals through the door. We eat all of our meals in our cell.

9. Inmate workers mop the dayroom, but it doesn't seem to get very clean. They'll mop it once during the first shift and once during the second shift. They don't usually mop during the third shift. The dayroom floors are only mopped sometimes.

There's often still garbage left all over the tier.

10. We've been asking the COs for cleaning detergent and we haven't gotten any. We've been asking for two weeks now, and they've only given us a bar of soap to wash our hands with. We have to use this bar of soap to clean our living quarters as well.

11. It's a small bar of soap. I try to keep my cell clean by ripping pieces of fabric from my towel and using soap or shampoo to clean the floors.

12. The staff passed out soap on April 1st and on April 6th. They pass out a bar of soap about once a week. The last time I got soap was last week, the week of April 13.

13. The staff passed out one mask April 1st and another mask about a week later, on April 6th. The masks are made out of cloth. Today the COs exchanged our old masks for new ones. I wash my mask every day using the bar of soap using the sink in my cell.

14. Only some of the staff wear masks, and they only wear masks sometimes. Those that wear masks, wear masks made out of cloth. I don't see staff members washing their hands regularly, and they don't seem to carry hand sanitizer. They wear latex

gloves.

15. The inmates on our unit share six showers. They don't clean the showers after each use, and I don't know how often the showers are cleaned.

16. There are three phones per pole, and inmates can only stand about two feet away from each other when using the phones. The phones are not regularly cleaned. Sometimes inmates will wipe the phone down with a paper towel between uses, and I know that sometimes COs will direct an inmate worker to wipe the phone down using a watered down solution.

17. The staff has not provided medical services. I have several medical conditions: asthma, fatty liver disease, mild liver fibrosis, and high cholesterol. Since being at Corrigan, I have not received one of my preventative asthma medications. I have been trying to see a doctor for two months, and have filed a grievance. I still have not been able to see a doctor, and I have not gotten my preventative asthma medication.

18. At the beginning of the coronavirus pandemic, we received a staff memo that basically instructs us not to contact medical services unless we're showing symptoms of COVID-19.

19. I understand that I'm at higher risk because of my asthma and other chronic health conditions. I have repeatedly asked multiple staff members--the warden, unit manager, my counselor, and lieutenants--what kind of precautions they're taking for people like me, who have asthma and health conditions. No one has given me a response.

20. There are two people on my tier who I believe have had COVID-19. They share a cell and they began to get sick around April 2 or April 3. Since they began to get sick, they were forbidden to leave their cell. They were forbidden to shower, to make

phone calls, or to even clear the trash out of their cell. The only treatment that I could see is that a staff member would come in once per shift to take their temperature. They were in this isolation for two weeks, and have recently been released back onto the tier.

21. I regularly spoke to these guys when they were isolated in their cell. The cell in which they were isolated was very close to the phones. You could easily speak to them through an opening at the bottom of the door. I know that one of the guys actually tested positive for coronavirus, and so I assume that his cellmate also had it.

22. I spoke to the COs about their bad treatment of these sick guys. I argued that those guys should get showers, and that what the COs were doing was wrong. No one made any changes.

23. I have not been tested for coronavirus, and as far as I know, no one else on the tier has been.

24. I am very stressed because I don't want to get sick. I have asthma so I'm at risk, and I don't want to bring anything home to my moms and get her sick. When I ask staff members what they're doing to protect us, they tell me not to worry about it because I'm getting out in about 30 days. I don't want to go home in a body bag.

25. 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.

26. 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/Angel Caballero

by Faith Barksdale