EXHIBIT G
Declaration of Marcus Champagne

1. I, Marcus Champagne, declare as follows:

2. I have been incarcerated at Hartford Correctional Center (HCC) since February 20th, 2020. I am 24 years old. I am housed in Dorm 4 of HCC. To my knowledge, there are 120 people housed in my unit, 60 on each side.

3. I have severe asthma, and multiple immune disorders (psoriasis, eczema, and alopecia).

4. Our facility has been on lockdown every day for about a month. During this period of lockdown, I can only leave the dorm to shower and use the phone.

5. I sleep approximately 4 feet above and approximately 4 feet away from the people in the next beds over. Our sleeping area is not cleaned or sanitized by staff. Two inmates have left to go to medical with fevers and the staff did not wipe down their areas. We do not get provided cleaning supplies other than two bars of soap in the past month. Most recently, we received a bar of soap on April 13th, 2020.

6. I eat my meals in my dorm, and the CO who passes them out doesn’t wear gloves or a mask.

7. I share 4 showers with approximately 60 other people. The showers are not sanitized, they are only cleaned with hot water.

8. Since the onset of the coronavirus pandemic, I have observed staff re-using gloves and gloves and failing to wear masks. CO’s have told me that they are scared, because they are not provided with masks and have to bring their own. They haven’t been able to find enough at stores.

9. Staff have provided me with one mask made out of cloth. The vast majority of
inmates have been wearing the same cloth mask for the past 2 weeks without washing it.

10. I have come into contact with someone in my facility who has tested positive for the coronavirus. The prison staff did not go through proper precautions to clean afterward. They sprayed his bunk one time with water, but no bleach. In addition, people have been sick and asking to go to medical and have been denied. I’ve seen 3 or 4 people sick with coronavirus symptoms, and only 2 have gone to medical. One of those people had been asking repeatedly for the entire day. Both of the people who have been to medical didn’t come back to the dorm.

11. Right now, I am sleeping two bunks away from someone who tested positive for COVID-19 and was sent to Northern, then moved back to Hartford CC after two days. He was quarantined at Hartford for 16 days, he told me. I feel nervous about sleeping so close to someone who tested positive.

12. I feel like I’m a lab rat trapped in a small place waiting to get sick.

13. The Commissioner has been saying that the CO’s are getting the proper amount of gloves and disinfectants, but from what I see, they’re not getting anything at all.

14. 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.

15. 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 23rd day of April, 2020.
Marcus Champagne

by ___________