

# **EXHIBIT J**

### **Declaration of Chaz Gulley**

1. I, Chaz Gulley, declare as follows:
2. I have been incarcerated at Corrigan-Radgowski Correctional Center since May 2019. I am 35 years old. I am housed in the restrictive housing unit, which houses inmates from both the Corrigan and Radgowski buildings of my facility. To my knowledge, there are 48 people housed in my unit.
3. My facility has been on lockdown every day since approximately March 31<sup>st</sup>, after people within the facility started testing positive for COVID-19. During this period of lockdown, I usually get 15-minute showers on Mondays, Wednesdays, and Fridays. I've been told I can choose between half an hour of rec and half an hour phone call each day, and I've always chosen the phone call, but sometimes they don't allow phone calls at all. That is the only time I am allowed out of my cell. I eat meals in my cell.
4. I don't have a cell-mate. My sleeping area is not cleaned nor sanitized by staff. I am not provided cleaning supplies to clean my own cell. I can request someone to come clean my cell, but that won't happen during lockdowns.
5. The staff provide us with soap when we request it. I do not have access to hand sanitizer.
6. Our unit shares approximately 2 showers for 48 people. I also share 1 phone with the entire unit. Handcuffs are not sanitized between uses, and anyone who comes out of cell in my unit has to wear handcuffs.
7. Since the onset of the coronavirus pandemic, I have observed staff wearing masks and gloves, but not consistently. It depends on the day how many staff are actually wearing protective equipment.

8. Staff have provided me with a memo of guidance about how to protect myself and others from coronavirus transmission, and one mask made out of cloth.
9. 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.
10. 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 8<sup>th</sup> day of April, 2020.

Chaz Gulley

By  \_\_\_\_\_