

# **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
and all others similarly situated,	:	
	:	CIVIL ACTION NO. 20-1959
Plaintiffs-Petitioners,	:	
	:	(Schiller, J.)
v.	:	
	:	
CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	
	:	

**DECLARATION OF NAEEM BEYAH**

I, Naeem Beyah, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 33 years old and currently incarcerated at Curran-Fromhold Correctional Facility (CFCF).
2. I am currently housed on Unit D2P4.
3. The jail started issuing soap to the block on Wednesdays, but there is not enough soap to distribute to everyone who signs for it. Unit D2 consists of four pods but only receives one box of soap with a count of 140 bars. This is not enough to be divided between all 4 pods on Unit D2.
4. If someone runs out of soap or does not receive a bar, staff typically tell them to wait until the next distribution day.
5. Our out-of-cell time is still drastically cut short because there is a lack of staff. On Friday, November 27 and Saturday, November 28, 2020, for example, the unit received no out-of-

cell time because not enough COs came to work. On Sunday, November 29, 2020, the unit received about 30 minutes of out-of-cell time.

6. The staffing shortage similarly affects cleaning and sanitation.

7. I am a block worker. Sometimes even those of us who are block workers are not permitted out of our cells to work because there is not enough staff on the unit. When there are not enough staff members working on the unit, only one block worker will be let out to get people water or mail, but not to clean.

8. Cleaning is also hampered by the lack of cleaning supplies and equipment. As a result, common areas are not cleaned properly on a daily basis.

9. Block workers only receive two spray bottles with cleaning solution, which are less than a quarter full, so we have to stretch the solution with water. This is not enough to clean the phones, tables, and other frequently touched surfaces four times a day.

10. We have never received supplies to clean our cells twice per week. There has been no weekly General Inspection (GI) cleaning since the beginning of the pandemic.

11. If we want to clean our cells, we have to buy laundry detergent from commissary to use as cleaning solution.

12. The phones are not cleaned after every use because we do not have enough disinfectant.

13. I only have two cloth masks.

14. There is no weekly mask distribution. Staff tell us that there is a shortage of masks.

15. On the limited occasions that there have been mask distributions, there are not enough masks for everyone on the unit. If you are not in the first 20 or so people to receive the signature sheet, you are not going to get a mask.

16. Damaged masks—or masks with writing on the front—are often confiscated but not replaced with new ones.

17. D2P4 has not had a uniform or sheet exchange for the past two months.

18. Some staff members still do not wear their masks correctly while they are on the unit. Some staff members pull their masks down while they speak to incarcerated people.

19. From November 12 to November 17, 2020, our unit was on quarantine because one incarcerated person on the unit had a high fever; however, the facility did not test the rest of us for COVID-19. While on quarantine, we were unable to receive hot food from commissary or attend court dates. We were also locked in our cells even more than normal and unable to clean the block.

Pursuant to 28 U.S.C. § 1746, I, Naeem Beyah, declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of December, 2020.

  
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Naeem Beyah

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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Defendants-Respondents.	:	
	:	

**DECLARATION OF EMANUEL BRYANT**

I, Emanuel Bryant, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am currently incarcerated at the Philadelphia Industrial Correctional Center (PICC). I am currently housed on J Unit, where I am in disciplinary custody, also known as “the hole.” I was previously housed on E Unit and was the block representative.
2. When I was first placed on disciplinary custody, I was sent to the psychiatric ward because there was no room in the hole. I was forced to strip and wear a smock from October 21–23, 2020 before being placed in the hole.
3. The staff members in the hole do not change their gloves between passing out trays and completing other tasks in the unit. I do not believe that the guards care about the safety of the prisoners or the prison conditions.

4. I do not receive a free bar of soap each week. I have not received soap since I was sent to the hole in October. The staff do not provide free soap when I run out. I asked a guard for soap on October 28, 2020, and he told me that he did not have any soap available.

5. I do not receive a clean hand towel each week.

6. I am only permitted to shower once a week.

7. My housing unit is not cleaned four times a day. The phones are not cleaned after every use. I do not receive cleaning supplies to clean my cell and sleeping area twice a week nor do I receive cleaning supplies when I request them.

8. I cannot have my masks, towels, and underwear washed twice a week. I also cannot have my linens and uniforms washed once a week. Typically, our clothes are washed twice a month. The staff forge our signatures on the compliance sheets to indicate that our items are washed even when they are not.

9. I do not have four masks. Masks are not distributed or exchanged weekly. We are forced to sign the compliance sheet to indicate that we have four masks or that we received masks, but most people only have one mask. The staff do not replace damaged, ripped, or torn masks.

10. The staff members do not wear masks while they are inside the facility and they do not enforce mask usage of the inmates. Not everyone wears masks outside their cells.

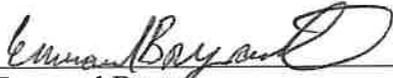
11. I do not receive 45 minutes of out-of-cell time each day. The staff forge signatures on the compliance sheets to indicate that we received out-of-cell time when we did not.

12. When I was on E Unit, CO Abraham Fofana repeatedly told me to forge other inmates' signatures. He asked me to go around to get inmates to sign for recreation, soap, laundry, and linen exchange. But if they did not sign, I was instructed to forge their signatures.

13. Once CO Fofana saw that I would not accommodate his order to forge inmate signatures, he and CO Syretta Smith wrote me up with a disciplinary infraction for having too much reading material in my cell. I was also written up for complaining about the conditions on the unit.

14. When I made legitimate complaints about being asked to forge signatures, CO Fofana took away my position as a block representative.

Pursuant to 28 U.S.C. § 1746, I, Emanuel Bryant, declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of November, 2020.

  
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Emanuel Bryant

**IN THE UNITED STATES DISTRICT COURT  
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Defendants-Respondents.	:	
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**DECLARATION OF KENNETH CLARK**

I, Kenneth Clark, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 63 years old and currently incarcerated at Curran-Fromhold Correctional Facility (CFCF) on Unit C1P4.
2. I am living with a bad hernia and I have not received proper medical attention, despite submitting sick call requests.
3. I have bottom-tier and bottom-bunk status because I have problems with my knee, but from early September until late November, 2020, I was housed on the top tier in a top bunk. It was incredibly painful to have to walk up and down stairs and up and down the bunk ladder every day.
4. I was previously housed on unit B1P1 with other incarcerated men who are older or who have medical issues, but I was transferred to C1P4 on September 2, 2020, with no explanation.

5. Out-of-cell time on C1P4 is still inconsistent, especially on the weekends.
6. On weekends, we are lucky to come out of our cells at all, and, if we do, it is generally for only about 30 minutes. For example, on Saturday, November 14, 2020 and Sunday, November 15, 2020, the top tier did not come out all day. On Saturday, November 21; Sunday, November 22; and Monday, November 23, 2020, we were let out for only about 20 minutes each day.
7. Sometimes the correctional officers leave for lunch and do not come back to let us out of our cells.
8. On days when we are not permitted adequate out-of-cell time, we are unable to shower, speak on the phone with loved ones, or go outside for fresh air.
9. We are not let out frequently enough to make phone calls or take showers every day because not enough staff members come to work.
10. There is a signature sheet that we are told to sign to come out of our cells, but sometimes we sign and still are not allowed to come out of our cells.
11. I have three face masks.
12. Staff began passing out new masks the first week of December 2020. Prior to December, I only had one mask, which I had to wash myself so that it was clean enough to wear.
13. Masks are not easily replaced when they are damaged or ripped. When we ask for a replacement, staff members tell us we have to wait for the next distribution.
14. We are given one small bar of soap each week, but it is not enough to last the whole week. I run out of soap every week and have to buy additional soap from commissary.
15. When we run out of soap in between distributions, correctional officers will not provide us with another bar of soap.

16. The common areas of C1P4 are not cleaned four times per day. Depending on which correctional officer is on duty, the block workers are told to clean up to two times a day. For the most part, only the floors and tables are cleaned. Frequently touched surfaces, such as door handles, are not cleaned.

17. Phones are not cleaned after every use. When we ask for bleach to clean them ourselves before using them, some correctional officers will provide cleaning solution, but others will not.

18. Since I was transferred to C1P4 in September, there has been no mention of General Inspection (GI) cell cleaning.

19. I have only been able to get cleaning supplies to clean my own cell three times in the three months that I have been on C1P4.

20. We have to clean our cells with our personal bar of soap, water, and old rags. This is not only insufficient disinfectant to clean our cells properly, but it also means that we run out of our personal bar of soap more quickly.

21. Staff members do not wear masks most of the time, including when they are on the unit interacting with incarcerated people. Even in medical, staff members do not consistently wear masks.

22. Laundry is inconsistent on C1P4 because the block worker who is responsible for picking up facility laundry is not always let out of his cell and allowed to pick up the block's clean uniforms and sheets. We have to wait two to three weeks between laundry exchanges.

Pursuant to 28 U.S.C. § 1746, I, Kenneth Clark, declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of December, 2020.

  
Kenneth Clark

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**DECLARATION OF HAKIMA HARRIS**

I, Hakima Harris, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 35 years old and currently incarcerated at ASDCU, on Unit B.
2. I was transferred from Mod-3 to ASDCU in early October.
3. The conditions at Mod-3 were very bad.
4. There was mold and chipped paint in many of the cells.
5. Some of the mold had been painted over and the smell of the mold mixed with the paint was making some of the women feel ill.
6. I had a very bad ear infection while housed on Mod-3. I submitted multiple sick call notes and the infection worsened, resulting in pus coming out of my ear. I was not properly treated with antibiotics until after I was transferred to ASDCU.
7. There are around 40 people in the dorm at ASDCU and at least five people in each cube.

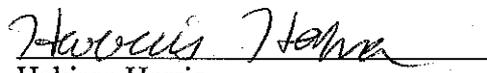
8. There is no room for social distancing.
9. I do not feel safe at ASDCU because the custody levels are all mixed up, with women who should be in segregated custody levels all living together.
10. B Unit frequently runs out of toilet paper.
11. We do not receive clean hand towels every week. I have been washing my hand towel myself in my cell to keep it clean.
12. B Unit is not cleaned four times a day. Typically, it is cleaned once during the morning shift and once in the evening shift.
13. I have been working as a unit worker for two months and I was not paid for the first six weeks that I was working. I continued to clean even though I was not being paid to try to keep the unit hygienic to prevent the spread of COVID-19. I did not get paid until I submitted a grievance to report the issue.
14. We are only given very diluted cleaning products to use to clean the unit. I do not believe we are cleaning with proper disinfectant.
15. The phones are not cleaned before we use them.
16. We do not regularly receive cleaning supplies to clean our cubicles.
17. When we request cleaning supplies for our cubicles, we are refused most of the time.
18. The masks that they are giving us are used. I can tell because they are wrinkly, stained, and smell different than the new ones we were initially given.
19. I still see staff members working in the facility without wearing masks.
20. On October 20, 2020 two Captains informed us that someone on B Unit had been exposed to COVID-19.

21. We were quarantined for two weeks as a result. For several days, they did not test everyone and just took our temperatures, but eventually they did swab everyone on the unit. We never received any test results but were taken off of quarantine after two weeks.

22. While quarantined, we were denied any time outside.

23. During quarantine, sick calls were conducted on the unit where they could be overheard by other incarcerated women and staff. We had no privacy when we spoke to a nurse or doctor during what should have been confidential conversations. People with medical issues were not receiving proper medical care because they could not leave the unit.

Pursuant to 28 U.S.C. § 1746, I, Hakima Harris, declare under penalty of perjury that the foregoing is true and correct. Executed this 2nd day of December, 2020.

  
Hakima Harris

**IN THE UNITED STATES DISTRICT COURT  
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	:	

**DECLARATION OF JOHN MASTERSON**

I, John Masterson, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 31 years old and currently incarcerated at Riverside Correctional Facility (RCF).
2. I am currently housed on Unit E.
3. Out-of-cell time on Unit E is still inconsistent.
4. Some days we come out late because of staff shortages. Other days we are not permitted to come out of our cells at all.
5. Some days our recreation time is cut short because letting us out of our cells is up to the discretion of correctional officers (COs). For example, on November 11, 2020, our recreation time was shortened by 20 minutes because the CO on duty said he was passing out food first, even though this can be done while we are out of our cells.

6. We are required to sign a signature sheet when we come out of our cells and even on some days when we are not allowed to come out. For example, on November 19, 2020, I had to sign the signature sheet even though I was not let out of my cell at all on that day.

7. When we are not allowed to leave our cells, or are not let out for a long enough time period, we are unable to make phone calls to our family or take showers.

8. We do not receive a bar of soap every week. We receive soap about once a month.

9. Every time I have asked staff members for soap, they say they do not have any or cannot give it to me.

10. If we want soap, we have to buy it from commissary.

11. Unit E has not been cleaned properly. Block workers are usually locked in their cell for most of the day and are therefore unable to clean. More recently, cleaning has improved but only after people on Unit E tested positive for COVID-19.

12. For most of the time I have been housed on this unit, the phones were not cleaned after each use. At the most, phones were cleaned once per day. Now, the phones are being cleaned after each use, but only after people on the unit tested positive for COVID-19.

13. We were not receiving cleaning supplies to clean our cells on any regular basis or schedule until someone on the unit tested positive for COVID-19. Now there is a bottle of cleaning solution available that we can request.

14. General Inspection (GI) cleanings still do not occur each week as they did before the COVID-19 pandemic began.

15. Mask exchange does not happen every week. I got four masks about three months ago and I have not gotten new masks since then.

16. I wash my masks myself in my cell with soap or shampoo that I buy from commissary.

17. When masks are ripped or damaged, staff do not always replace them. When staff do replace ripped or damaged masks, it takes a long time and the masks are not new, but rather used, recycled masks.

18. A block rep made an announcement in late-October that if our masks are damaged, we will have to pay \$3 for a replacement.

19. If we do not have a mask, we are not allowed out of our cells.

20. Laundry is not done every week.

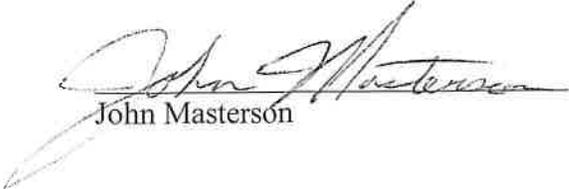
21. I have to wash my shirts and underwear in my cell's sink, which is attached to the toilet, because laundry is not done regularly.

22. I have to use soap that I buy from commissary to do my personal laundry.

23. I have not received clean sheets since I arrived at RCF two months ago. I have had the same sheets since I was transferred to this facility.

24. Some staff members still do not wear masks while they are working in the facility.

Pursuant to 28 U.S.C. § 1746, I, John Masterson, declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of November, 2020.



John Masterson

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**DECLARATION OF JOEL MEDINA**

I, Joel Medina, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 25 years old and currently incarcerated at Curran-Fromhold Correctional Facility (CFCF).
2. I am currently housed on Unit A2P2.
3. Before my transfer to A2P2 on November 1, 2020, I was housed on Unit B2P3.
4. Prior to my transfer to Unit B2P3, I was housed for 43 days on quarantine Unit B1P4 in a multipurpose room with other people who told me they had already tested positive for COVID-19. We were locked in for many of the 43 days with no change of clothes and no access to our families.
5. Out-of-cell time on Unit B2P3 was also inconsistent. For example, from October 22, 2020 through October 25, 2020, we were locked in our cells for four days straight.

6. On November 1, 2020, the day I was moved to Unit A2P2, I was denied recreation time.

7. On Unit A2P2, we are required to sign a sheet to leave our cells, but the times are not filled in until after, so we do not know whether the signatures sheets accurately reflect how much out-of-cell time we receive.

8. I only have three masks.

9. Unit A2P2 is not cleaned four times a day. It is being cleaned about once a day. Many of the frequently touched surfaces are not being cleaned, such as the railings and tables.

10. The phones are not cleaned after each use. The phones are only cleaned once per day after many people have used them.

11. I have never received supplies to clean my cell. There is no weekly GI (General Inspection) cleaning.

12. When we ask for cleaning supplies, staff members say that we will get them later but we never do.

13. We do not receive uniform exchanges or clean sheets every week. We get clean laundry about every two weeks.

14. People who do not have money on their books cannot send out mail because the jail will not provide even one free stamp or envelope.

15. We are not permitted to go to the law library. This makes it very difficult for us to prepare for our cases.

Pursuant to 28 U.S.C. § 1746, I, Joel Medina, declare under penalty of perjury that the foregoing is true and correct. Executed this 2nd day of December, 2020.

  
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Joel Medina

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**DECLARATION OF ROLAND RIVERS**

I, Roland Rivers, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 34 years old and currently incarcerated at Philadelphia Industrial Correctional Center (PICC).
2. I am currently housed on Unit C.
3. Over Thanksgiving weekend, our out-of-cell time was severely reduced. On Saturday and Sunday, November 28-29, 2020 we were only allowed to leave our cells for 20 minutes each day.
4. Because of the lack of out-of-cell time, many of us were not able to contact our families for the holiday.
5. As we only had 20 minutes, we had to choose between taking a shower and making a phone call.

6. We have not been receiving stamped envelopes to use to contact our families. Since the pandemic began, we have maybe received four stamped envelopes. A lot of the men on Unit C cannot afford stamps from commissary so are unable to write to their loved ones or attorneys.

7. On Saturday, November 28, 2020, I watched a correctional officer forge signatures on the recreation signature sheet.

8. The housing unit is not cleaned properly four times per day.

9. Tables and TV sets are not being wiped down, despite being touched frequently.

10. Phones are not being cleaned after every use.

11. Only the showers and the floors are being cleaned, but not four times per day. At the most, they are being cleaned twice per day.

12. When the pandemic began, the workers cleaned common spaces more frequently, but since the summer, the cleaning has dropped off.

13. We are not given specific time to clean our cells and are only allowed to do so during our limited recreation time. General Inspection (GI), which consisted of regularly scheduled cell cleaning, is not happening anymore.

14. We are not provided cleaning supplies to clean our cells unless we specifically request them. When we request cleaning supplies, it is inconsistent and up to individual correctional officers' discretion whether we receive supplies.

15. Our unit only has two house brooms and they are both broken and dirty and need to be replaced.

16. I only have three face masks.

17. There is no weekly distribution of face masks. I wash my own in order to keep it clean.

18. For a few weeks, COs made us sign a sheet saying that we were receiving new masks, but we never actually received them.

19. Other people housed on my unit do not have four face masks either. I have shared my extra masks with other incarcerated people who do not have a single wearable mask.

20. Many staff members pull their masks down below their mouths when they speak to us.

21. Grievance forms are not generally available to the people housed on my unit. There are no grievance forms on the table with the commissary forms, as there were in the past. In order to get a grievance form, we have to ask correctional officers directly.

22. I have asked for grievance forms on several occasions and been denied them. When we ask for grievance forms, staff tell us that they do not have any more.

Pursuant to 28 U.S.C. § 1746, I, Roland Rivers, declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of November, 2020.

  
Roland Rivers

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**DECLARATION OF MAURICE SMITH**

I, Maurice Smith, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 27 years old and currently incarcerated at Philadelphia Industrial Correctional Center (PICC).
2. I am currently housed on Unit G2.
3. Unit G2 is not cleaned four times a day.
4. The only part of the unit that is cleaned daily is the showers, which are only cleaned twice or maybe three times per day.
5. The phones are not cleaned after each use. I have only seen the phones cleaned twice in the five months that I have been on this unit.
6. We do not receive the opportunity to clean our cells twice per week.
7. We are permitted to clean our cells twice per month, every other Sunday.

8. Even when we are permitted clean, we are not given proper supplies such as bleach or disinfectant.

9. It is very difficult to get any type of cleaning supplies. We cannot even get a broom to sweep our cells out. Staff do not give us anything to clean the sink, toilet, or floors.

10. Staff only pass out toilet paper about once a month. When we request toilet paper, they say that they do not have any. We often run out of toilet paper.

11. We do not receive a bar of soap every week. Soap is passed out about once per month.

12. If we run out of soap, we have to repeatedly beg for more before we are able to get another bar.

13. I only have one mask.

14. The last time they passed out masks was over a month ago and they only gave everyone one mask each.

15. People on my unit do not have four masks each. Most people only have one mask.

16. We had to sign a paper that says we have four masks, but we do not have four masks.

17. We are only allowed one laundry day each week, which is supposed to be Thursday; however, we still cannot have our laundry done some weeks because there is not enough soap.

18. Sheets and uniforms are not consistently washed every week. It is more like twice per month.

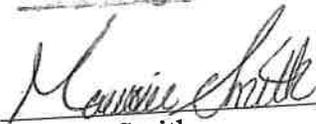
19. Staff members only wear masks when their supervisors are present. Otherwise, they take them off.

20. There are only four phones on the unit, so it is very hard to get a chance to use the phone to contact my family.

21. Recreation time is still inconsistent. For example, the weekend of November 27-29, 2020, we were only let out for about 20 minutes each day.

22. I was not able to speak to my family over the Thanksgiving holiday. Other men on my unit were also unable to speak with their families.

Pursuant to 28 U.S.C. § 1746, I, Maurice Smith, declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of December, 2020.

  
\_\_\_\_\_  
Maurice Smith