

Affidavit of Steven Weil on behalf of Anthony Mays

My name is Steven Weil. I am an attorney who is licensed to practice in the Northern District of Illinois. On April 2, 2020, I spoke to a detainee in the Cook County Jail named Anthony Mays, and he provided me with the following information:

1. Mr. Mays is 38 years old. He is charged as a felon in possession, and is currently detained on Division 8, tier 3F of the Cook County Jail. Mr. Mays is in a congregate living situation. Each cell on his tier has two concrete beds, spaced two feet apart.
2. Anthony Mays is sick. He has diabetes and prior to COVID-19 infecting individuals at the Jail, he was being referred out for evaluation of a heart condition.
3. There are approximately 40 beds on Mr. Mays' tier. The tier is packed with people.
4. New detainees continue to arrive on the tier.
5. There are no grievance forms on the tier. There have been no grievances available for quite a long time.
6. The sick call slips were removed from the tier several days ago. If a detainee feels sick, there is no channel by which to alert healthcare.
7. Many detainees on the tier seem sick.
8. Nobody has come on the tier to pick up trash in two days.
9. Guards on the tier are wearing masks, but no other protective equipment.
10. Mr. Mays does not feel physically safe in his current living conditions.

I declare under penalty of perjury that the foregoing is true and correct.

April 2, 2020
Chicago, Illinois

s/ Steven Weil
Steven Weil

Affidavit of Matthew McLoughlin on Behalf of Mary Hayes for Christopher Zeigler

My name is Matthew McLoughlin. I am the Director of Programs at the Chicago Community Bond Fund. On April 1, 2020, I spoke to Mary Hayes, who provided me the following information about Christopher Zeigler, Ms. Hayes' fiancé, who is a detainee in the Cook County Jail.

1. Mr. Zeigler is 24 years old. He is residing in Division 6 of the Cook County Jail. He is incarcerated on a \$100,000 D Bond that he cannot afford to pay.
2. Mr. Zeigler has MRSA and a compromised immune system.
3. Mr. Zeigler is residing in a one-person cell on his division, however, there are only 6 single person cells in the division. The rest are double occupancy. There are two levels of cells in Mr. Zeigler's division. The entire division is being quarantined.
4. Because they are in quarantine, all people in this division are on lock-down. Detainees are let out of their cells for three hours per day.
5. Yesterday, detainees refused to lock up in their cells because they wanted more time out and they were not being given a clear explanation by guards as to what is happening in the jail. All the detainees who initially refused to lock up were threatened with mace. A sheriff's deputy told Mr. Zeigler and others that since they refused to lock up, they would not be tested for COVID-19.
6. Every detainee in this division shares a shower. There are three showers shared by everyone. Five or six cells of detainees are allowed out at a time to share the shower area. Everyone in the unit shares the same sinks.
7. Mr. Zeigler works to clean up the tier. There are no more Clorox wipes for cleaning. They have not received the normal chemicals to clean the shower stalls. Mr. Zeigler has observed black mold in the shower area.
8. Some nurses and medical staff are wearing protective gear. But detainees have not received any personal protective equipment (PPE).

I am providing this hearsay declaration because of restrictions on visitors and contact with detainees in the Cook County Jail. I declare under penalty of perjury that the foregoing is true and correct.

April 2, 2020
Chicago, Illinois

s/ Matthew McLoughlin
Matthew McLoughlin

Affidavit of Christina Lorenzo on Behalf of Jakeena Leonard for Rafael Ortiz

My name is Christina Lorenzo. I am the Intake Coordinator at the Chicago Community Bond Fund. On April 1, 2020, I spoke to Jakeena Leonard, who provided me the following information about Rafael Ortiz, her fiancé, who is a detainee in the Cook County Jail.

1. Mr. Ortiz is 33 years old. He is residing in Division 2, Dorm 4 of the Cook County Jail. He is incarcerated on a \$40,000 D Bond that he cannot afford to pay.
2. Mr. Ortiz has been experiencing bloody noses and difficulty breathing, but he has not been tested for COVID-19.
3. Mr. Ortiz is living in a dorm with many other people. All of the people in the dorm are sleeping on cots, close together.
4. The people in the dorm must use a shared bathroom and shower area. There is no privacy.
5. The Commissary was shut down last week. Detainees, including Mr. Ortiz, are not receiving any soap, sanitizer, bleach or alcohol wipes.
6. Mr. Ortiz has not seen any jail staff wearing masks or gloves. Detainees are not given personal protective equipment (PPE).
7. A man who was sleeping next to Mr. Ortiz for two weeks was removed from the tier for testing positive. He has not returned.

I am providing this hearsay declaration because of restrictions on visitors and contact with detainees in the Cook County Jail. I declare under penalty of perjury that the foregoing is true and correct.

April 3, 2020
Chicago, Illinois

s/ Christina Lorenzo
Christina Lorenzo

Affidavit of Matthew McLoughlin on Behalf of Shirley Stewart for Vincent Stewart

My name is Matthew McLoughlin. I am the Director of Programs at the Chicago Community Bond Fund. On April 1, 2020, I spoke to Shirley Stewart, who provided me the following information about Vincent Stewart, her son, who is a detainee in the Cook County Jail.

1. Mr. Stewart is 38 years old. He is residing in Division 8 of the Cook County Jail. He is incarcerated on a \$80,000 bond that he cannot afford to pay.
2. Mr. Stewart has Hodgkin's Lymphoma, and his white blood count is currently 33% of the normal rate.
3. Mr. Stewart's division is on lockdown. He resides in a dormitory setting. Everyone in the dormitory shares a microwave for cooking food.
4. He has been given no additional cleaning or sanitizing products since the outbreak of COVID-19 in Illinois and in the Jail. No procedures have changed in the jail, except some people have left.
5. Guards are wearing masks and gloves, though that began only recently. Detainees are not given any personal protective equipment (PPE).

I am providing this hearsay declaration because of restrictions on visitors and contact with detainees in the Cook County Jail. I declare under penalty of perjury that the foregoing is true and correct.

April 2, 2020
Chicago, Illinois

s/ Matthew McLoughlin
Matthew McLoughlin

Affidavit of Christina Lorenzo on Behalf of Judia Jackson for Kenneth Foster

My name is Christina Lorenzo. I am the Intake Coordinator at the Chicago Community Bond Fund. On April 1, 2020, I spoke to Judia Jackson, who provided me the following information about Kenneth Foster, her friend, who is a detainee in the Cook County Jail.

1. Mr. Foster is 39 years old. He resides in Division 2 of the Cook County Jail. He is incarcerated on a \$50,000 D Bond that he cannot afford to pay.
2. Mr. Foster has Stage 4 Stomach Cancer, Lung-Sarcoidosis, high blood pressure, asthma and bronchitis.
3. Mr. Foster is living in a dorm setting in Division 2. He sleeps on a lower bunk. Everyone on his tier sleeps very close together.
4. Social distancing is not possible in the division. Everyone on Mr. Foster's tier shares a shower and bathroom area. Everyone is together all the time and there is very little privacy. People gather in the dayroom.
5. Mr. Foster is receiving soap but no hand sanitizer.
6. The Jail staff plan to cut off access to the Commissary and detainees will not have access to the phones if they do not have money in their account.
7. Mr. Foster has seen the correctional officers wearing masks, but not gloves. Detainees are not given access to personal protective equipment (PPE).
8. The detainees in the division share a shower area. The shower area has not been sanitized.
9. Five or six people from Mr. Foster's dorm have tested positive for COVID-19. So far Mr. Foster is not exhibiting any symptoms and so he has not been tested.
10. The people who tested positive for the virus were removed from the dorm. Mr. Foster does not know what happened to them.

I am providing this hearsay declaration because of restrictions on visitors and contact with detainees in the Cook County Jail. I declare under penalty of perjury that the foregoing is true and correct.

April 2, 2020
Chicago, Illinois

s/ Christina Lorenzo
Christina Lorenzo

Affidavit of Christina Lorenzo on Behalf of Crystal Smith for Sharita Parks

My name is Christina Lorenzo. I am the Intake Coordinator at the Chicago Community Bond Fund. On April 1, 2020, I spoke to Crystal Smith, who provided me the following information about Sharita Parks, her wife, who is a detainee in the Cook County Jail.

1. Ms. Parks is 35 years old. She is residing in Division 8 of the Cook County Jail. She is incarcerated on a \$100,000 D Bond that she cannot afford to pay.
2. Ms. Parks is living in an open dorm with 5 other women. Each of the women are sleeping on cots very close to one another.
3. All of the women in the dorm are sharing a bathroom and shower area.
4. All detainees in Ms. Park's division eat together. It is crowded in the eating area.
5. A woman in the dorm tested positive. She was removed from the dorm.

I am providing this hearsay declaration because of restrictions on visitors and contact with detainees in the Cook County Jail. I declare under penalty of perjury that the foregoing is true and correct.

April 2, 2020
Chicago, Illinois

s/ Christina Lorenzo
Christina Lorenzo

Affidavit of Christina Lorenzo on Behalf of Jala Burns for Charles James Wimberly

My name is Christina Lorenzo. I am the Intake Coordinator at the Chicago Community Bond Fund. On April 1, 2020, I spoke to Jala Burns, who provided me the following information about Charles James Wimberly, the father of her child, who is a detainee in the Cook County Jail.

1. Mr. Wimberly is 22 years old. He is residing in Division 6 of the Cook County Jail. He is incarcerated on a \$10,000 D Bond that he cannot afford to pay.
2. Mr. Wimberly has bronchitis, for which he is not receiving any medication.
3. Mr. Wimberly is living in a cell with another cellmate.
4. The detainees in the division have a shared shower area. Mr. Wimberly does not have access to soap. He has not received hand sanitizer since last week.
5. This weekend is the last weekend they are getting commissary. The Jail is cutting off access to the commissary after the weekend.
6. The Jail does not provide personal protective equipment (PPE) to detainees. Mr. Wimberly uses his shirt to cover the phone, because staff are not cleaning the phones.
7. A few people have been removed from the division because they were visibly sick. Mr. Wimberly does not know if they got tested for COVID-19, or tested positive for COVID-19, but they have not returned to the division.

I am providing this hearsay declaration because of restrictions on visitors and contact with detainees in the Cook County Jail. I declare under penalty of perjury that the foregoing is true and correct.

April 2, 2020
Chicago, Illinois

s/ Christina Lorenzo
Christina Lorenzo

Affidavit of Christina Lorenzo on Behalf of Mary Robinson for Terrance Robinson

My name is Christina Lorenzo. I am the Intake Coordinator at the Chicago Community Bond Fund. On April 1, 2020, I spoke to Mary Robinson, who provided me the following information about Terrance Robinson, her son, who is a detainee in the Cook County Jail.

1. Mr. Robinson is 26 years old. He is residing in Division 6 of the Cook County Jail. He is incarcerated on a \$200,000 D Bond that he cannot afford to pay.
2. Mr. Robinson has bronchitis, and he is receiving medication for depression. He has had a fever and scratchy throat for a week.
3. Mr. Robinson is living in a cell with another cellmate. Mr. Robinson sleeps on the lower bunk.
4. The detainees in the division share a shower area. Mr. Robinson does not have access to soap or sanitizer.
5. Division 6 is on lockdown, and detainees are only being let out of their cell for a couple hours a day, five detainees at a time.
6. Two men in the division got sick with the virus. Both were transferred off the deck. Mr. Robinson does not know what happened to them.
7. While COs are wearing masks and gloves, detainees are not given personal protective equipment (PPE).

I am providing this hearsay declaration because of restrictions on visitors and contact with detainees in the Cook County Jail. I declare under penalty of perjury that the foregoing is true and correct.

April 2, 2020
Chicago, Illinois

s/ Christina Lorenzo
Christina Lorenzo

Affidavit of Christina Lorenzo on Behalf of Andjine Doret for Brandon Mathis

My name is Christina Lorenzo. I am the Intake Coordinator at the Chicago Community Bond Fund. On April 2, 2020, I spoke to Andjine Doret, who provided me the following information about Brandon Mathis, her partner, who is a detainee in the Cook County Jail.

1. Mr. Mathis is 26 years old. He resides in Division 11 of the Cook County Jail. He is incarcerated on a \$40,000 D Bond that he cannot afford to pay.
2. Mr. Mathis was previously shot in the throat, and his throat was reconstructed, making it hard for him to breathe. He had open heart surgery when he was a child. He suffers from blood clots and swelling in his feet, but he is not receiving medication.
3. Mr. Mathis is living in a cell with another cellmate. Mr. Mathis sleeps on the lower bunk. The cell has not been cleaned.
4. Social distancing is not possible in the division. All detainees are close together when they are in the common room, on the phones, or in the dayroom.
5. The detainees in the division share a shower area. The shower area has not been sanitized.
6. Mr. Mathis has not been given soap or sanitizer. Detainees are not being given personal protective equipment (PPE).
7. Two men in the division got sick with the virus (COVID-19). Both were transferred off the deck. Mr. Robinson does not know what happened to them.
8. Two people tested positive for COVID-19 on the deck across from Mr. Mathis. Jail staff took the belongings of those individuals and threw them out, and then sanitized the cell.
9. Mr. Mathis has not been tested for COVID-19 but he has started to feel sick. He feels hot and like he cannot breathe, and suffers headaches.

I am providing this hearsay declaration because of restrictions on visitors and contact with detainees in the Cook County Jail. I declare under penalty of perjury that the foregoing is true and correct.

April 2, 2020
Chicago, Illinois

s/ Christina Lorenzo
Christina Lorenzo

Affidavit of Christina Lorenzo on Behalf of Myesha McLemore for Sean Alexander

My name is Christina Lorenzo. I am the Intake Coordinator at the Chicago Community Bond Fund. On April 2, 2020, I spoke to Myesha McLemore, who provided me the following information about Sean Alexander, her boyfriend, who is a detainee in the Cook County Jail.

1. Mr. Alexander is 19 years old. He is currently in Division 11 of the Cook County Jail. He is incarcerated on a \$70,000 D Bond that he cannot afford to pay.
2. Mr. Alexander has sickle cell anemia. He should be receiving medication for the disease but is not currently being medicated.
3. Prior to being transferred to Division 11, Mr. Alexander was living in Division 6 with a cellmate. For two days, up until March 6, he also lived in Division 2 in a dorm-style setting.
4. Mr. Alexander is currently housed in a two-person cell with a cellmate. Mr. Alexander sleeps on the upper bunk. The bunks are very close together. Mr. Alexander shares a sink and toilet with his cellmate. They have not been given cleaning products to clean their cell. Mr. Alexander and his cellmate clean as well as they can with what they can buy from the commissary.
5. Social distancing is not possible in the division. All residents are close together when in the common area. All residents share the shower area.
6. Mr. Alexander stated to Ms. McLemore that the detainees in Division 11 are being given soap but not sanitizer. While jail staff have sprayed (disinfected) the common area, they have not disinfected the individual cells.
7. Some—but not all—of the jail staff wear masks and gloves. Mr. Alexander does not have access to gloves or masks. Another resident in his division had started cutting up shirts to use as masks, but that resident then tested positive for COVID-19, and so the other residents stopped using those shirt masks.
8. Anyone with a temperature that was too high has been removed to quarantine, though Mr. Alexander does not know where that is. The person who tested positive was removed from the deck, and jail staff threw out his belongings and moved his cellmate into a different cell with another person. That other person is now coughing, and jail staff have told him not to touch the remotes and to keep in his cell.

I am providing this hearsay declaration because of restrictions on visitors and contact with detainees in the Cook County Jail. I declare under penalty of perjury that the foregoing is true and correct.

April 2, 2020
Chicago, Illinois

s/ Christina Lorenzo
Christina Lorenzo