

## DECLARATION OF DAMEON HENLEY

My name is Dameon Henley. I declare under penalty of perjury that the following is true and correct to the best of my knowledge.

1. My name is Dameon Henley. I am 33 years old. My DOC number is 247805. I am imprisoned at MCF-Lino Lakes
2. Before I was moved to my current unit—South D—I was in the treatment unit at the prison. I completed the 6-8 month TRIAD program, and I was a mentor and worked as a clerk for the program. I am waiting to get a job in the unit as a swamper. I am on the waiting list.
3. I am concerned I will get COVID-19 in this prison.
4. In my unit, I think there are more than 75 people with 2 people to a room. It isn't possible to social distance, even when only half of the unit is out in the common area, because we all use the same phones, and the phones are right next to each other. We also have to wait in line for the phones. It's the same with the showers, because we have to wait in line for the showers.
5. I have seen a couple hand-washing stations installed since the start of the pandemic. One is in health services, and the other is by the kitchen. So unless you are going to health services or the kitchen, you don't have access to these stations. There was always a hand-sanitizer station inside of the treatment unit, that didn't change with the pandemic. I can't remember if there is one in South D because I just got here.
6. I have chronic asthma and since March, I have had a pinched nerve in my back that causes my leg to go numb. I have to use an inhaler every night.
7. I don't think I've received proper medical care since the pandemic.
8. In around March, I asked for sick call because my leg was going numb. I couldn't walk for more than 10 steps, or stand for more than 5-10 minutes without it going numb. The COs told me that I could only see a doctor if I had COVID-19 symptoms or was dealing with a life-threatening emergency. Eventually, I was in so much pain that the COs agreed to call health services and let me go down there to see a nurse.
9. When I was able to see health services, I told them about my leg going numb and I was in a lot of pain. I thought all of this was because of a pinched nerve. But I've never felt pain like that. A nurse gave me medication. When that didn't help, the nurse told me I could use ice and heat, so I used my own heating pad.
10. In about April or May, I was finally able to go to health services to see a doctor. The doctor told me he would put me on the lists for an MRI and an injection for the pain. Around that same time, a supervising nurse put me on the list for a bottom bunk because I was in so much pain I couldn't climb up or down the ladder for the top bunk. I did get a bottom bunk.
11. In maybe May, one night, the pain was so bad I couldn't bear it. I got out of bed and crawled on my hands and knees to the common area after the CO agreed to let me out of my cell. I asked to go to health services. The COs made some calls but told me I would have to wait until the next day. The next day, health services called me down. They only asked me about the medication they gave me. They told me that there wasn't anything

else they could do because I had a pinched nerve. I told them the medication hadn't helped.

12. In June, I finally got a cortisone shot to help with the pain at an outside clinic. I also got an MRI there, where I was told I had a herniated disc at L5 that was causing a pinched nerve. When I got back from the clinic, I did not have to quarantine and went back to my regular unit. So for three months, I was in excruciating pain from the pinched nerve.
13. The doctor at the prison had recommended physical therapy. But because of COVID-19, physical therapy was gone for a while. The first time I saw a physical therapist was around June, after I got the shot. The physical therapist gave me stretches to do. The stretches didn't help and they hurt. Then the pandemic got really bad. I was in a lot of pain—I was crooked, bent over, and couldn't walk. I kept sending kites to health service, asking for help, but I didn't get any response.
14. A month after my first shot, I got another cortisone shot in July. It didn't help with the pain, but it did straighten me out. I waited two weeks until after the shot and then sent in a kite saying that my leg and foot were going numb. I asked to see the doctor. A nurse told me I was on the doctor's list and it would be another two weeks.
15. As of September 19, 2020, I still haven't seen the doctor. I did see a physical therapist at the end of August, who put me on a list to see the neurosurgeon.
16. I applied for Conditional Medical Release in April or May. The DOC denied me, because they said my medical situation wasn't severe enough.
17. If released, I would live with my fiancé or my cousin in North Minneapolis.

DATED: September 19, 2020

/s/ Dameon Henley