DECLARATION OF ROBERT RAPHAEL SCHULTZ

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

- 1. My name is Robert Schultz. I am 52 years old. My DOC number is 137892. I live at MCF-Faribault.
- 2. I live in unit K2B and have been there since April 2020. Before that, I was in unit 4D.
- 3. I am scared I will get COVID-19 in this prison.
- 4. There are about 100 people in the unit. We can't social distance, especially when we're in our rooms.
- 5. I am also worried because the ventilation system is connected room to room. I think because the ventilation runs throughout the whole building, all four units in each building would be affected. And all the air is recirculated so there is never any fresh air.
- 6. The DOC hasn't done enough to make sure the common areas are clean. There is a hand-sanitizer outside of the unit, which inmates can only use if we are on the patio. During the lockdown, we weren't allowed on the patio. Now, we go out there twice a day. Basically, the hand-sanitizer is only for the COs. And it is empty a lot of the times. For example, it has been empty for 4-5 days now.
- 7. Sometimes, there are spray bottles in the common area. But we only get a certain number of bottles each week, so if we run out, we don't get more. We run out all the time. That includes cleaning supplies like toilet cleaner and general disinfectant for the cells as well.
- 8. There aren't any cleaning supplies around the shower to use, and our rule book states that we can't clean the shower. There is one spray bottle hanging up by the phones but most of the time it's empty. The swampers, inmates who clean, won't fill it back up because they are limited on what they can give us per day. I don't think there has been an increase in the cleaning supplies available to us since COVID-19 hit.
- 9. I don't think the DOC hired extra swampers to clean in our unit. There are still the same swampers and temp-swampers—employees in training.
- 10. In April or May, the DOC gave us two small bars of soap. The bar lasts at the most a week.
- 11. I applied for Conditional Medical Release around maybe June. I have a bad kidney and bad lungs. I have diagnoses for these issues, but I don't know what the diagnoses are called. I can't exercise because it's too hard to breathe when I do. My kidney doesn't work.
- 12. In July, the DOC informed me they denied my release because they didn't know if I would pose a threat to public safety. I was surprised because my release date is January 25, 2021, less than 6 months away. And when I get released, I won't be on intensive supervision because my MNSTARR score is low. I'll just be on regular parole or supervision. If I was released, I would live with my mom in Wells, Minnesota.
- 13. If inmates here test positive for COVID-19, they are quarantined for two weeks.

 According to one of the guards, people were being quarantined in 3 different units. A couple people were in quarantine elsewhere and then moved into my unit. That was concerning to me because the people could've been positive. They told me they didn't

- have a negative test before they were moved to my unit. This didn't make sense, especially because they were testing everyone at that time. So the DOC was testing everyone except the people who tested positive.
- 14. DOC made Anagram workers work at the balloon shop throughout the pandemic because it was "essential" for them to work so the DOC would get the money for Anagram. At the balloon shop, they fold balloons. I don't think balloons are essential. I think lives are more essential than balloons. It seemed they were more worried about money than lives.

DATED: August 27, 2020

9-17-20

/s Robert Schultz

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