

DECLARATION OF RON HILL

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

1. My name is Ron Hill. My DOC ID is 161390. I am imprisoned at MCF-Faribault in Linden, the medical unit.
2. There are roughly 90 people in this unit. I have been in this unit for two years.
3. I have a number of health conditions. I have hypertension, breathing problems and a lung issue due to an internal decapitation and a double stroke. I have physical limitations too. My left leg drags and I need to use a walker. I also can't raise my left arm more than 45 degrees. I have had pneumonia twice, and I run out of breath easily. I can't go more than a few minutes without stopping to take a large and deep breath. I also use a feeding tube.
4. I am scared I will get COVID-19 in the prison.
5. In March of 2020, when the news started covering the COVID-19 pandemic, it was chaos in the prison. The DOC didn't know what to do or how to do it. Staff were coming in and out of the units not wearing masks. They were being very careless. Besides not wearing masks, the staff was not social distancing. It seemed like the staff was treating COVID-19 like the cold or the flu. In fact, nursing staff specifically told me not to worry about COVID-19, because it is like the cold or the flu.
6. It is not possible to social distance in the Linden unit. In the wing of the unit that I'm in, there are 4 beds per room, and the beds are side by side. Because the rooms are about 15x20 feet, it is not possible to be 6 feet apart from your roommates. Each room also has a toilet. There is a spray bottle with diluted germicide in it to clean the toilet area. I can tell it is diluted because of the color. Instead of being dark green, it is more of a lime green. We aren't given any towels to wipe down the toilet after we spray it. We only have toilet paper. Because I am nice to one of the inmates who cleans, sometimes he will give me an extra towel or rag to use.
7. In my unit, there is one shower per wing, for about 30 people. There is a spray bottle with diluted germicide but again, no towels provided to wipe down the showers.
8. I first applied for Conditional Medical Release in April of 2020. I was denied. The denial letter stated that if I were to contract COVID-19, I wouldn't be in grave danger.
9. If released on Conditional Medical Release, I would live with a family friend in Faribault.

10. I reapplied for Conditional Medical Release in May of 2020, approximately 10 weeks ago, and as of August 5, 2020, I have not heard about the status of my application.
11. If an inmate complained of symptoms of the virus, he would be locked up in the Restricted Living Unit known as the RLU, for 23 hours a day, like he was being punished.
12. I was one of the people who was locked away in the RLU, and I was locked away twice.
13. On or about April 27, 2020, I complained to nursing staff about having chills. I thought I had pneumonia again. I wasn't showing any other symptoms of COVID-19. I was given a COVID-19 test and moved to the RLU right away. The next morning, less than 24 hours after the test, a doctor told me I tested negative. But I was still kept in the RLU for 15 days. I wasn't the only person this happened to.
14. On or about July 3, 2020, I went to the hospital briefly to have an issue with my feeding tube fixed. When I returned to the prison, I was given a COVID-19 test and again moved to the RLU. Less than 48 hours later, a doctor told me that I had tested negative. Even though I had a negative test, I was kept in the RLU for 18 days.
15. In the RLU, COs would put tags on the cell doors to show who had tested positive for COVID-19 and who was still awaiting testing results. No one would clean the common area after someone at the RLU who had a tag was let out for their 1 hour per day. That is a problem because not all people in that unit were confirmed positive. Some were still waiting for their tests and could be negative, like I was.
16. While I was in the RLU both times—for a total of 32 days—I didn't receive proper care. I take medication 3 times per day, and because of my feeding tube, I get the majority of my nutrition through roughly 64 ounces of supplements, like Ensure. The staff repeatedly failed to bring me my medication and my supplements on time. I would have to constantly remind them and request them. The nurses also forgot about my feeding tube and the supplements I take many times. One day, I did not receive my supplements and medicine until 11 P.M.—3 hours after I was supposed to have them. When my medicine and supplements are delayed, I get hunger pains and extreme nerve pain in my neck due to the internal decapitation.
17. During the lockdown, which started in mid-March, inmates kept getting transferred to the Linden unit, sometimes directly from the hospital after being there for many days. This concerned me because it showed that there wasn't a coherent policy for when people had to go to the RLU from the hospital, as I had been put there for 18 days after my brief visit to the hospital. It also concerned me because the people who were being transferred could have had the virus.

18. The first time I was given a mask was the end of March. The mask I was given is hard for me to breathe in because it is extremely thick—like a canvas cloth. When I've told the guards I can't breathe in the mask, they tell me there is nothing they can do about it. When I went to the hospital to fix an issue with my feeding tube, I got two masks that are easier for me to breathe with.
19. Up until the beginning of July, the COs and the healthcare staff weren't wearing their masks consistently. I still see some COs without masks behind their desks, which are inside the unit. I also still see healthcare professionals in their offices behind glass talking to each other without masks.

DATE: August 5, 2020

August 25, 2020

/s/ Ron Hill

