

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JAMAAL CAMERON; RICHARD BRIGGS; RAJ LEE;
MICHAEL CAMERON; MATTHEW SAUNDERS,
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

MICHAEL BOUCHARD, in his official capacity as
Sheriff of Oakland County; CURTIS D. CHILDS, in his
official capacity as Commander of Corrective Services;
OAKLAND COUNTY, MICHIGAN,

Defendants.

Case No.

DECLARATION OF JAMAAL CAMERON

I, Jamaal Cameron, declare:

I make this declaration based upon my own personal knowledge, and if called to testify, I could and would do so competently.

1. I am currently serving a sentence in Oakland County Jail (“the Jail”). I have been here since March 11, 2020. My release date is August 28, 2020.
2. I suffer from bronchitis and have for much of my life. I have also been diagnosed with hypertension since coming to the Jail. I also have sleep apnea, which was diagnosed shortly before I came to the Jail. Because of my sleep apnea, I sometimes do not breathe at night for a period of 15-30 seconds. I am supposed to have a c-pac machine to sleep with to alleviate the apnea, but before the COVID-19 crisis started, I was told by a nurse that the jail does not have a machine and I would not be given one. Because of my medical conditions, I am terrified that if I am exposed to coronavirus I might die as a result. No one deserves that.

3. Until yesterday, I was a food trustee and was housed in the annex building. The annex is one of two jail buildings and is divided into an eastern and western portion. I was housed in the western portion. The other building is the main building. Everyone in the jail knows that there has been a coronavirus outbreak in the main building, and someone in the eastern section of the annex was recently moved to the main building as well based on suspicion of exposure.
4. As a food trustee, my job was to finalize the preparation of food and pass it out to people in the annex. Most of the food is pre-prepared in the main kitchen, which is located in the main building. Everyone knows that a kitchen trustee in the main building was diagnosed with the coronavirus. In addition, a cousin of mine worked for Aramark, the outside contractor that provides food services in the main building kitchen. She was diagnosed with coronavirus less than two weeks ago, and is now hospitalized and fighting for her life. The food that I had to work with was carried over from the main building by Aramark employees in plastic carts and containers. Sometimes the Aramark employees had on gloves, sometimes they did not.
5. Yesterday, we just received news that we would have to do more of the food preparation work in the annex because of the outbreak in the main building. However, the food still comes from the main building's kitchen and some of the processing (like slicing of meat) occurs there in the infected kitchen space. I was worried both because infected supplies from the main building pose a fatal risk to me and other trustees, and because if any of us are infected, we will be passing it on to everyone else through the food preparation process.
6. Because I was worried for my safety, I asked to be transferred to an alternate trustee duty, such as cleaning bathrooms or something like that. My request was denied.
7. As a trustee, I was given a single flimsy pair of plastic gloves to wear when I did my work. I was not given a mask. No one detained in the annex has a mask. Accordingly, I passed out food every day to the other people detained in the annex without proper protective equipment.
8. As a medically vulnerable food trustee, I feared for my life from having to handle food that is brought over from the main kitchen and handled there first. When I raised concerns about continuing to do this work in light of the risks to me with Mr. Ketterwell, the supervisor in charge of food distribution, he

told me there was no coronavirus in the main kitchen and I had nothing to worry about. When I told him I knew that wasn't true, he threatened to send me to the main building—where, again, there is known to be an outbreak—if I kept asking questions or requesting protection.

9. This morning, I told the jailors that I was not willing to do the food preparation because I was afraid of getting sick. I was punished by being moved to the main jail building and put into the worst cell, which people call “the Tank.” The tank has no beds. There are ten of us in the cell, and we have to sleep on a concrete floor with a thin blanket that is not enough to keep anyone warm. We are all extremely close to each other and are essentially forced to cuddle. We are in Cell R4. The cell immediately next to ours is Cell R5, and that is where people with coronavirus are being held. I could reach out my hand from my cell and reach into cell R5. Everyone in my cell shares one toilet and one sink. There is a bar of soap at the sink, but no way to wash the toilet or sink. When I have to sit on the toilet, I will be sitting on the same dirty, steel toilet as everyone else. When I was placed in this cell, I was not given a mask. We've asked for masks, but haven't received any yet. While I was on the phone with my attorney, a cell mate of mine asked for a grievance form because of the unhygienic conditions here. The guard refused to give him a form and walked away.
10. It is common for the guards in the annex to threaten us with being moved to the main building where the coronavirus outbreak is located. This is particularly common when people ask for facts about the coronavirus. One person who I saw ask a guard for a mask for his own protection was told by a guard that he was being a smart ass and was told to go sit on a shared bench. There are no signs anywhere in the annex providing us with information about coronavirus and we are not able to ask the guards for information because they threaten us when we do.
11. Even the guards in the annex frequently do not have masks and gloves. A few do, but most do not. Mostly, they only use gloves when checking our temperatures. Once a week, the guards conduct “changeout,” meaning that our sheets and things are replaced. During changeout, guards search our room. They are not wearing gloves and masks during changeout.
12. I lived in a room called a “quarter,” which is basically a barracks-style room. It has 32 beds, approximately 25 of which were occupied. There are four quarters, two on each of two floors, in the western section of the annex. In

my quarter, I had a bunkmate, whose bunk was approximately 3 feet below mine; basically the same as a normal kids' bunk bed. The bunk across from mine was much less than six feet away as well. I could reach out and easily touch the person across from me if they reach out as well. It is impossible to maintain six feet of separation when lying in my bunk and even more impossible during the day when people are up and moving around.

13. Our quarter was not cleaned or disinfected in any way, except a weekly vacuuming. Everyone was responsible for their own bunk area. I tried to keep my area clean, but several guys in my quarter left food lying around or are otherwise dirty. The only disinfectant available in our section of the jail is called DMQ and there are a couple of bottles in the bathroom. We are not allowed to have any in our quarter. So we have no way to clean our bunks, the shared door to our quarter, and other commonly touched surfaces in the quarter. Even the DMQ in the bathroom is highly diluted. I can tell because before the coronavirus hit, the DMQ was a deep yellow color. Now the bottles are nearly clear. A guard told us that DMQ will not kill the coronavirus anyhow. We do not have access to bleach or Clorox to clean any shared spaces or in the bathroom.
14. We request medical attention by completing "kites," which are distributed by the nurses themselves every morning.
15. However, since last week, the nurses stopped making daily rounds to distribute kites in the annex. We then had no way to request medical attention. Luckily, none of the other guys in my quarter had showed symptoms of COVID-19 yet, but if they had, I do not know how we could have gotten treatment. The only way any of us were checked medically is that they took our temperature a few times a day. Before they stopped coming by, a nurse told me that the doctor will not return to the Jail until May.
16. When the nurses stopped coming, a meeting was held in the day room for everyone in our four quarters who regularly receives medication. The nurses provided a 30-day supply of medication to each person and told them to keep track of it themselves. I was keeping my medicine in my locker and hoping it didn't get stolen. I will have no way to replace it if it does. At this meeting, there were approximately 40 people, all of whom had medical conditions that forced us to rely on medication, packed into the day room. If I had put my arms out and spun in a circle, I probably would have hit 4 or 5 other guys.

17. In the western portion of the annex, each floor (so, two quarters) shares a single bathroom. The bathrooms are nasty. Whenever I enter the shower it is filled with clumps of hair, dirt, and dead insects. I try to push this disgusting mess around with a squeegee, but it is impossible to really clean, and the only cleaning fluid available anyway is the diluted DMQ I described above. There are six showerheads, but only two work, and they are right next to each other. There is no privacy between showers and the two that work are closer than 6 feet.
18. There are six toilets in the bathroom. Sometimes there is only one roll of toilet paper for all six toilets, meaning that it has to be passed from toilet to toilet. The only way to clean the toilet is to wipe with DMQ, and there is nothing to use to wipe other than the limited toilet paper.
19. I am lucky when it comes to soap because I had pre-purchased a supply that may last me through the month from the commissary before it closed last week. But now the commissary is now closed. For people who did not pre-purchase soap, the only access they have to soap are shared bars of non-anti-bacterial motel-style soap that are provided in the bathroom. Most of the other guys in my quarter did not have their own supply of soap.
20. After washing your hands in the bathroom, there are no paper towels or other way to dry your hand. Many people shake their hands to dry them, spreading water and germs all over the place.
21. We are not given access to hand sanitizer of any kind.
22. We are not given access to Kleenex.
23. The ventilation in the annex building is awful. I woke up every day with a dry mouth and often with bloody boogers. My bunkmate had a bloody nose every morning. I once saw a guy touch one of the air vents and knock down a solid block of dust that was blocking the vents.
24. Laundry came once a week in the annex. That is when inmates get a uniform change and blankets. However, as a kitchen trustee, I was lucky and got a new uniform every day.
25. Everyone in my quarter was a trustee, so I understand a lot about the trustee system and their duties. The laundry trustees in the annex also do laundry that

comes from the main building, meaning that laundry trustees have had to handle infected dirty linens. Several laundry trustees quit as a result. If a trustee says they want to quit because of the dangers of the job, they are moved to the main building where the coronavirus outbreak is.

26. A guy I know filed a grievance about being forced to work in the kitchen in unsafe conditions. He was told that if he filed a grievance he'd be moved to the tank and his good time credits would be taken away. He filed a grievance anyhow, and was moved to the tank. Now that I, too, have been moved to the tank he is my cellmate.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

April 10, 2020

/s/Jamaal Cameron
Jamaal Cameron

*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above declaration. I am an attorney admitted to the Eastern District of Michigan. On April 10, 2020, I personally spoke with Jamaal Cameron and read this declaration to him. Mr. Cameron told me that the information in the above declaration is true, and gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/Philip Mayor
Philip Mayor