

DECLARATION OF DEVONTE STEWART

I, Devonte Stewart, certify under penalty of perjury that the following statement is true and correct pursuant to 28 U.S.C. § 1746.

1. My name is Devonte Stewart. I am 25 years old and of sound mind.
2. I am currently detained pretrial at the East Baton Rouge Parish Prison in East Baton Rouge, Louisiana. I have been in the jail since January 22, 2019. My bond is \$24,000, and I also have three holds keeping me in jail. One of those holds is a bench warrant in Caddo Parish that was issued when I missed court in early 2019, after I had already been booked into the East Baton Rouge Parish Prison. My criminal attorney has been trying to get my holds lifted, but she hasn't been able to get any of them removed yet.
3. I previously submitted a declaration in this case dated May 22, 2020 describing my experience in the jail with coronavirus and with the jail's response to the virus.
4. Since that declaration, I spent about 45 days on B3, one of the coronavirus lockdown lines that had been condemned before the virus hit. I missed court dates, including one where I was supposed to take a plea deal for time served and two years of parole. This made no sense to me—I should have been released so I could get the proper care I needed, since the jail wasn't treating us right.
5. While I was on B3, the jail brought at least 12 other men onto the line with me, and we all shared the same space, even while I was trying to recover. Some of the guys never even got tested for coronavirus. The jail regularly moved guys on and off the line. Around late May, after we filed this case, the jail finally unlocked our cells during the day. The cells were already full with four people each, and there were too many people for us to socially distance in the cells.
6. When my attorneys got to do the inspection in this case, the jail moved people off the lockdown lines and back to their general population lines just to make it look good, even though those people still tested positive. The jail moved people about 3 days before the inspection. B3 had been full, but there were only a few of us back there during the inspection. The jail is slick like that and moves people around a lot.
7. We told the nurses and guards that our shower didn't work. The nurse agreed that we needed a working shower to keep up with our hygiene, but the guard said it was irrelevant—he didn't even care about getting us hot water. The nurse disagreed with him, but still the shower never got fixed. And the jail staff lied to our families about how well the shower worked when we had family members call in.
8. I finally got off the coronavirus lockdown line on June 10th.
9. When I got back to general population, I learned that I had developed high blood pressure after I recovered from the coronavirus. I had never had high blood pressure before. No one in my family has high blood pressure, I'm not overweight, I don't smoke, and I eat pretty healthy. I'm really concerned about my health because I know high blood pressure

is a serious thing. I also get light-headed regularly, and I'm not sure if this is related to my high blood pressure or not. This is new since I had the coronavirus.

10. We still can't be six feet apart in the day room or during roll call and shift change. We still have to stand right behind each other, about one foot apart, for pill call.
11. I'm now on high blood pressure medicine and I get that medicine during pill call. But at least one nurse refuses to give me my medicine if I'm not lined up in a straight line right behind the other men for pill call. I've seen other men not get their medications if they're not lined up close together either.
12. Some of the guards on the line aren't wearing their masks, and they don't tell any of the detainees to wear their masks, except when they take someone off the line.
13. I spent some time on lockdown in M02 for a disciplinary issue since I've been back in general population. While I was on M02, the guards brought someone on the line with us who had tested positive for coronavirus. They took him off pretty quickly, but they told us we needed to quarantine for 14 days anyways, regardless of our disciplinary charge. The guys on the line got mad, so the jail took back that rule and let us go back to general population after about 10 days. I spent 13 total days on disciplinary lockdown.

This declaration was orally sworn to by Devonte Stewart on August 10, 2020 because the East Baton Rouge Parish Prison is currently not permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I have read the foregoing in its entirety to Devonte Stewart on August 10, 2020.

By: 
Miriam Nemeth
Date: August 10, 2020