

DECLARATION OF JIMMIE KNOTEN

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

1. My name is Jimmie Knoten. I am 67 years old and of sound mind.
2. I am currently detained in the East Baton Rouge Parish Prison. I was arrested and booked on July 19, 2020. My bond amount is \$25,000, and I'm only in the jail because I can't afford my bond.
3. Before I was arrested, I lived in an apartment by myself. I plan to go back to live there once I'm released.
4. In the past year, my wife died of HIV and both my father and sister passed away.
5. I have Post-Traumatic Stress Disorder (PTSD) from serving in the Vietnam War. I receive disability benefits for that. I also have asthma, hepatitis C, liver and lung disease, depression, and high blood pressure.
6. The jail knows about my medical conditions, but they do not give me any medication for my PTSD, hepatitis C, or an inhaler for my asthma. I've gotten only high blood pressure medication at the jail.
7. When I was brought to the jail, the guards held me in central booking for three to four days. The nurses didn't check my temperature or for any other symptoms of coronavirus. They also didn't test me for coronavirus. There were 10-15 other men in the cell with me. We all laid right next to each other and sat right next to each other. There was no other space. I had to sleep on the floor because there were no beds and not enough benches, and other guys slept right next to me. We all shared one toilet. The guards didn't give us any cleaning supplies and they only gave us one bar of soap to use to wash our hands. We didn't get hand sanitizer and couldn't take a shower to clean ourselves. The jail didn't do anything special to try to protect us against the coronavirus.
8. Around July 23, 2020, the guards put me on the A3 line, one of the lines where the jail quarantines new intakes.
9. Every cell was full on A3. There were about 24 people on the line, four in each cell, and a lot of them were coming and going even though we were supposed to be in quarantine with no new people for 14 days.
10. The guards gave us old, white, used cloth masks, and we wore them on the line most of the time. They gave cleaning supplies to one man who mopped the halls and cleaned the shower. I'm not sure how often the shower got cleaned. I used the same mop to try to keep my cell clean. But it was so dirty and nasty back there, it was filthy with dirt and dust.

11. The guards really only came on the line to feed us three times a day. Otherwise, we had to slam and kick the door to get their attention and get them to come on the line. Sometimes, they didn't wear masks.
12. One of my three cell mates on A3 was coughing up real bad, all day and all night. He wouldn't wear a mask, so I asked him to cover his mouth, but he wouldn't listen. He got moved out of A3, after we shared a cell for about 8-10 days, to a general population line.
13. Around August 5th, 2020, I started coughing really hard. I had a fever, felt hot and cold, and my blood pressure went up while I was sick. I was coughing so much that the other men around me got worried enough to call medical to get me checked. At medical, the nurse tested me for coronavirus.
14. The nurse told the guards to move me to B2, where I stayed for only a day with two other people in different cells, who were both waiting for coronavirus test results. B2 was nasty and filthy too. The day after I got to B2, I learned that I had tested positive for coronavirus. The two men on the line with me tested negative.
15. The guards moved me to B3, a lockdown line for people who have coronavirus, around August 7th. There was a 50 year-old man who also had coronavirus here with me, but he was moved to a general population line about four to five days after I got here.
16. When I was moved to B3, I lost all of my belongings from the A3 line because I couldn't go back and get my stuff. I couldn't get my mask, so the guards gave me another mask, but it was too big for me and slipped off my face. I asked for another one that would fit me, but they waited a week before giving me a new one.
17. In B3, we each have our own cells and we try to keep six feet apart because we know how important it is. But the guards never told us to stay apart from each other and they don't enforce any social distancing or masks.
18. The other man on the line woke me up to clean the cells every morning. He kept me active and handled everything around here. Even though we cleaned the line every day, it's still pretty dirty. After he was moved out of here and since I'm by myself, I wake up early and clean every day. I mopped about five or six times today just to get myself doing something and keeping my mind active. The guards don't give us anything to clean with, so the other guy used to get a cup of bleach from the hall man for us to clean and wipe things down. When I ask for cleaning supplies, the guards give me a mop and mop bucket with water and some cleaning solution in it. I think that cleaning solution might be bleach. Sometimes it takes several hours before they give me anything.
19. The only medical care I get in here is temperature checks twice daily and pill calls. The nurses give me only orange pills that taste like oranges for the coronavirus and my blood pressure pill. They don't even give me the proper medication I need for my PTSD, hepatitis C, or asthma. The nurses still haven't given me an inhaler, so sometimes I still

find it hard to breathe. When I ask for any of the medicine I still need, they just brush it off and ignore me like they didn't hear me.

20. The guards don't ever come to check up on us. They only come to give us food. It's hard to get anyone to come to the line, even if I'm in trouble.
21. One time, we needed the guards' attention because I didn't feel well. I was having trouble breathing, my fever was up, and my blood pressure was really high. The other man had to scream and shout, shake the bars, and bang and kick on the door to get the guards' attention. When he was ignored, he called his wife so she could tell the jail to get me medical attention. When I finally saw the nurse, she gave me only Tylenol and Mucinex. If I was to get really sick with coronavirus, I don't believe they have ventilators or nothing like that here. They don't care if I die or nothing. Now that I'm alone in here, if I need help again, it might be too late.
22. The guards did not provide us with any information about how to keep ourselves safe from coronavirus or what makes people more susceptible to contracting it.
23. Since getting coronavirus, I had to miss a court date because I'm on lockdown. I would probably already be out of here with credit for time served because the person who filed the charges against me dropped the charges.

This declaration was orally sworn to by Jimmie Knoten on August 18, 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 Jimmie Knoten on August 18, 2020.

By: 
Miriam R. Nemeth
Date: August 18, 2020