

**DECLARATION OF TOMMIE TELFAIR**

I, Tommie Telfair, am over the age of 18 and fully competent to make the following declaration:

1. I am currently incarcerated at the Federal Correctional Institution at Fort Dix. My Federal Bureau of Prisons Register Number is 28646-050. In 2010, I was convicted of conspiracy and possession with intent to distribute heroin. My current release date is February 2024. I am listed as a BOP “chronic care inmate” with nerve damage, stomach issues, and hip and knee injuries. On April 1, 2020 I was approved for surgery due to neurological damage in my back, which I believe also compromises my immune system.

2. I have been at Fort Dix since 2011 and, since February of this year, have been housed in the east compound in Building 5752 in a 12-man room. For months, I have witnessed many people in my building experiencing symptoms that are descriptive of COVID-19. My cellmate and I have had various symptoms but have not been tested for COVID-19.

3. My cellmate has been very sick for a while. He showed signs of sickness in March 2020 and in the weeks between March and April, he fainted twice. He was evaluated by medical but was not tested.

4. Additionally, I have witnessed four other men in my building being very ill. Their symptoms have included vomiting, long-term coughs, chills, headaches, sinus trouble, mucus and runny nose, hot and cold temperature checks, and unusual tiredness. To my knowledge, they have not been evaluated by medical and have not been tested for the virus. Other than my cellmate who fainted, none of us have been evaluated by medical for COVID-19 symptoms beyond the every-other-day temperature checks.

5. To my knowledge, no one in the east compound has been tested for COVID-19. I believe people are afraid of reporting symptoms to medical for fear of ending up in quarantine. Also, as a result of the long hours which it tends to take to be seen by medical, when we feel ill, we are forced to self medicate using medications from commissary, which hardly ever work, and are even more difficult to access now with controlled moves and the decreased staff-to-inmate ratio.

/s/ Tommie Telfair (by consent)

I, Tess Borden, certify that I reviewed the information contained in this declaration with Tommie Telfair by correspondence on May 20, 2020 and that, at that time, he certified that the information contained in this declaration was true and accurate to the best of his knowledge.

/s/ Tess Borden  
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