

Group Exhibit C
Declarations

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Kenneth Baines

1. My name is Kenneth Baines. I have been incarcerated in the IDOC since 2019 and my Mandatory Supervised Release date is in 2031.
2. I have been at Pontiac in the North House Modified Treatment Center (MTC) since February 2019.
3. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. ~~I have been in segregation in the RTU since about _____.~~
4. Because of cancellations of yard and mental health groups, I have often been in my cell for 21 to 24 hours a day for the last several months. There are weeks when both yard and groups are cancelled.

5. I am scheduled to attend mental health groups two times a week, but that has not been happening.

a. As of September 2, 2021, I had not had a mental health group in over a week.

b. As of October 6, 2021, I only got two mental health groups.

They last for around an hour. In the month of September I never refused a mental health group, but sometimes they say that I did.

6. I am supposed to see my QMHP (qualified mental health professional) every 30 days. For those sessions, I see the QMHP Benner. These sessions happen cellfront and are not Confidential. These sessions only last around three minutes.

7. The only other structured out of cell time offered to me is supposed to be my multidisciplinary staffing meeting, but that has not and that happens about _____ times a month. happened for around two months.

8. We are supposed to go to yard three times a week, but that is also canceled a lot

The week of September 2, yard was was not canceled. ~~Since then,~~ As of October 6, 2021, we have not had yard for two weeks.

9. We do not have dayrooms or any other recreation.

10. Last week, I got out of my cell for showers only.

11. Because of all the time locked down in my cell, I feel very overwhelmed even though I have nothing to do. I can't talk about my problems to anyone. I pace back and forth and talk to myself because there is nothing else to do.

12. On around sept. 10, I was placed on crisis watch. I spent about five on watch.

13. While on watch, my daily assessments with the QMHP were cellfront and lasted between 2 and 5 minutes.

~~The only other out-of-cell treatment or activity I had on watch was~~ I did not get any out of cell treatment or activities on watch. They once offered me an extra food tray if I would sit out and skip out of cell time. I refused, but still did not get any out of cell time.

14. The week after I came off of crisis watch, I was not seen for an individual counseling session with my QMHP. The follow-up was five days after I came off watch. They came to my cell, asked me to sign a paper, and left. It only lasted a few seconds.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October __, 2021.


Kenneth Baines

Witnessed by: 
Sarah Blair

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Tyshawn^GBarnes

1. My name is Tyshawn^GBarnes. I have been incarcerated in the IDOC since ~~April 1990~~ and my Mandatory Supervised Release date is in April 2022.
2. I have been at Pontiac in the North House Modified Treatment Center (MTC) since May 20, 2021.
3. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. I have been in segregation in the RTU since about May 20, 2021.
4. Because of cancellations of yard and mental health groups, I have often been in my cell for 24 hours a day for the last several months. There are weeks when both yard and groups are cancelled.

5. I am scheduled to attend mental health groups 5 times a week, but that has not been happening.

a. As of September 2, 2021, I had not had a mental health group in over a week.

b. As of October 6, 2021, I attended group only once the previous week

6. I am supposed to see my QMHP (qualified mental health professional) every 30 days. For those sessions, I see the QMHP Dr Benner

7. The only other structured out of cell time offered to me is Showers

and that happens about 9 times a month.

8. We are supposed to go to yard three times a week, but that is also canceled a lot

The week of September 2, yard was was not canceled. Since then, it is canceled most of the time

9. We do not have dayrooms or any other recreation.

10. Last week, I got out of my cell for one group, one yard
and one shower

11. Because of all the time locked down in my cell, I feel messed up.
I cannot function correctly. I feel
Anxious, and have pent up energy

~~12. On _____, I was placed on crisis watch. I spent about _____
on watch.~~

~~13. While on watch, my daily assessments with the QMHP were _____~~

~~The only other out-of-cell treatment or activity I had on watch was _____~~

~~14. The week after I came off of crisis watch, I was/was not seen for an individual counseling
session with my QMHP.~~

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 6, 2021.



Tyshawn Barnes

Witnessed by: Kyle Johnson 

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION**

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Jaki Bell

1. My name is Jaki Bell. I have been incarcerated in the IDOC since 2011 and my Mandatory Supervised Release date is in 2029.
2. I have been at Pontiac in the South Mental Health Unit since June 3, 2019.
3. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. I have been in segregation in the RTU since about June 9, 2011.
4. Because of cancellations of yard and mental health groups, I have often been in my cell for 24 hours a day for the last several months. There are weeks when both yard and groups are cancelled. Even when I call for a crisis team, they only speak with me at cell-front.
5. I am scheduled to attend mental health groups 2 or 3 times a week, but that has not been happening.
 - a. As of September 2, 2021, all of my mental health groups had been cancelled for about two weeks.

- b. As of September 28, 2021, all of my mental health groups have been cancelled all month.
6. I am supposed to see my QMHP (qualified mental health professional) twice every 30 days. For those sessions, I see the QMHP at cell front, and it is not confidential.
 7. The only other structured out of cell time offered to me is visits with psychiatry, which are also cell-front, and that happens about once a month.
 8. We are supposed to go to yard three times a week, but that is also canceled a lot. The week of September 2, 2021, our yard was cancelled. Since then, we have had yard once, on Monday, September 20th.
 9. We do not have dayrooms or any other recreation.
 10. Last week, I got out of my cell for one visit with my family. Visits with my family once a week are the only times I get out of my cell, other than the instances written above.
 11. Because of all the time locked down in my cell, I feel depressed every day. Not going to yard means I can't get exercise or fresh air. I feel frustrated and agitated. Being in my cell all day drives me crazy.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on ~~September~~ ^{October} 5, 2021.


Jaki Bell

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Taylor Cano

1. My name is Taylor Cano. I have been incarcerated in the IDOC since 2017 and my Mandatory Supervised Release date is in 2026.
2. I have been at Pontiac in the North House Modified Treatment Center (MTC) since January 2020.
3. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. ~~I have been in segregation in the RTU since about _____~~
4. Because of cancellations of yard and mental health groups, I have often been in my cell for 24 hours a day for the last several months. There are weeks when both yard and groups are cancelled.

10 hours

5. I am scheduled to attend mental health groups ~~2-3~~ times a week, but that has not been happening. As of October 6, 2021, I had not had a group in over 2 weeks. Otherwise, I had no groups in the month of September.

6. I am supposed to see my QMHP (qualified mental health professional) every 30 days. For those sessions, I see the QMHP Benner, but haven't seen him since July because he keeps reschedule rescheduling them.

7. The only other structured out of cell time offered to me is the multidisciplinary team meeting. My last one was in early August. They only last around 10 minutes.

and that happens about _____ times a month.
now happening cellfront.

Psychiatrist meetings are

8. We are supposed to go to yard three times a week, but that is also canceled a lot.

The week of September 2, 2021, our yard was canceled. Since then, yard has been happening only about once a week.

9. We do not have dayrooms or any other recreation.

10. Last week, I got out of my cell for yard only one time - from 11:30 AM to 2:00 PM. I was not offered groups. I do get to go for showers three times a week.

11. Because of all the time locked down in my cell, there is nothing to do.
~~and I isolate~~ I like going to yard and want
them to bring back dayroom.

~~12. On _____, I was placed on crisis watch. I spent about _____
on watch.~~

~~13. While on watch, my daily assessments with the QMHP were _____~~

~~The only other out-of-cell treatment or activity I had on watch was _____~~

~~14. The week after I came off of crisis watch, I was/was not seen for an individual counseling
session with my QMHP.~~

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 6, 2021.

[Signature]
Nyleen Cano

Witnessed by: [Signature]

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v:)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Anthony Davis

1. My name is Anthony Davis. I have been incarcerated in the IDOC since 2014 and I am ineligible for parole.
2. I have been at Pontiac in the North House Modified Treatment Center (MTC) since January 2021.
3. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. ~~I have been in segregation in the RTU since about~~ _____.
4. Because of cancellations of yard and mental health groups, I have often been in my cell for 23 to 24 hours a day for the last several months. There are weeks when both yard and groups are cancelled.

5. I am scheduled to attend mental health groups five times a week, but that has not been happening.
- a. As of September 2, 2021, I had not received any mental health groups since being transferred to the wing On August 27, 2021.
- b. As of October 6, 2021, I have only been given two groups.
We are told that groups are canceled because of staffing issues
6. I am supposed to see my QMHP (qualified mental health professional) every 30 days. For those sessions, I see the QMHP Benner. Our last one on one session was around four months ago and was held cellfront, which was not confidential. It only lasted five or six minutes.
7. The only other structured out of cell time offered to me is my interdisciplinary team meeting for around five minutes
and that happens about one times a month.
8. We are supposed to go to yard three times a week, but that is also canceled a lot Between August 27, 2021, when I was transferred to this wing, and September 2, 2021, I received no yard time. Since then, they have run yard only four times from 11:30 AM to 2:00PM each time. We do not get the option to go to the gym even when it is cold.
9. We do not have dayrooms or any other recreation.

10. Last week, I got out of my cell for around four and a half hours for
one yard and one group.

11. Because of all the time locked down in my cell, I've become anxious. When
I'm supposed to have group or yard the next day, I will
spend the night anticipating getting to leave my cell
only to have it canceled. I suffer from anxiety, racing
thoughts, and boredom. I have no chance to interact
with others or have a community. I am anxious about
going back to general population because I
have forgotten how to interact with people after
spending so much time in my cell. I have nothing
to do but I still feel exhausted and overwhelmed.

12. On _____, I was placed on crisis watch. I spent about _____
~~on watch.~~

13. While on watch, my daily assessments with the QMHP were _____

~~The only other out-of-cell treatment or activity I had on watch was _____~~


14. ~~The week after I came off of crisis watch, I was/was not seen for an individual counseling~~
~~session with my QMHP.~~

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 6, 2021.



Anthony Davis

Witnessed by: _____
Sarah Blair, Attorney

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION**

ASHOOR RASHO, et al.,

Plaintiffs,

v.

ROB JEFFREYS, et al.,

Defendants.

)
)
) No. 1:07-CV-1298-MMM-JEH
)
) Judge Michael M. Mihm
)
)
)
)

Declaration of Class Member Darren Evans

1. My name is Darren Evans. I have been incarcerated in the IDOC since 2014. I have been in the South Mental Health Unit at Pontiac since Dec. 2019.
2. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. I am general population status in the RTU.
3. Because of cancellations of yard and mental health groups, I have often been in my cell for 23 or more hours a day for the last several months. There are weeks when both yard and groups are cancelled. Mental health staff ~~check on us~~ do rounds at cell front. The out of cell time most consistently provided is showers three times a week.
more days ~~out~~ than not we do not get out of our cells at all.
4. I do not receive ten hours of structured out of cell time each week even though I am in RTU level of care.

5. As of September 2, 2021, I believe I was only scheduled for one mental health group per week for two hours. Even that one group was cancelled a lot, leaving me with no structured out of cell time.

my treatment plan says I should have 2-6 hours of groups per week, but that does not happen.

6. Lately, the mental health groups have been not run.

7. The only other structured out of cell time offered to me is individual

counseling with my QMHP

and that happens about once a month.

8. We are supposed to go to yard three times a week. As of September 2, 2021, at best we were getting yard once a week and sometimes not at all. Since then, it has

been the same with yard mostly cancelled. We have been to yard 2 or 3 times this month.

9. We do not have dayrooms or any other recreation.

10. I am in general population (not segregation) but we have not been allowed to go have meals in the dining room.

[Type here]

[Type here]

11. Last week, I only got out of my cell for medical care.

12. Because of all the time locked down in my cell, I feel that my mental illness is deteriorating and causes me to self harm just to get out of my cell. There is no opportunity to use the coping skills I have learned to deal with my mental illness because I'm alone in my cell all the time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September __, 2021.

Darren Evans

Witnessed by: _____

13. On 9/9/21 I was placed on crisis watch. I spent 15 ~~days~~ on watch.

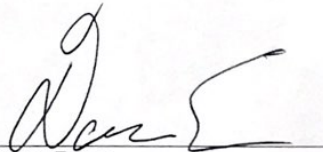
14. While on watch, my daily assessments with the QMHP were cell front
except for a couple times.


The only other out-of-cell treatment or activity I had on watch was when I
self-harmed and went to the health
care unit.

15. The week after I came off of crisis watch, ~~Lee~~ was not seen for an individual counseling session with my QMHP. I've been in my cell since I came off of watch.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 21 2021.


Darren Evans

Witnessed by: 

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Brett Frain

1. My name is Brett Frain. I have been incarcerated in the IDOC since September, 2020, and my Mandatory Supervised Release date is in May, 2023.

2. I have been at Pontiac in the North House Modified Treatment Center (MTC) since February 22, 2021

3. I am designated as General Population (GP) and Residential Treatment Unit (RTU) level of care. [REDACTED]

4. Because of cancellations of yard and mental health groups, I have often been in my cell for 24 hours a day for the last several months. There are weeks when both yard and groups are cancelled.

b. As of October 6, 2021, I was being provided about
Two groups a week.

6. I am supposed to see my QMHP (qualified mental health professional) every 30 days. For those sessions, ~~_____~~ I have not been assigned a QMHP since Ms Jan left and Berner stopped coming.

7. The only other structured out of cell time offered to me is yard and
showers. Yard ~~_____~~ is offered about Half the time
and ~~_____~~ happens about 12 times a month.
Showers

8. We are supposed to go to yard three times a week, but that is also canceled a lot

The week of September 2, yard was ~~_____~~ canceled. Since then, yard
has been canceled half the time.

9. We do not have dayrooms or any other recreation.

11. Because of all the time locked down in my cell, I've gotten used
to making the best of my time
in the cell.

12. On _____, I was placed on crisis watch. I spent about a week and a
half
on watch.

13. While on watch, my daily assessments with the QMHP were cellfront.

The only other out-of-cell treatment or activity I had on watch was none

14. The week after I came off of crisis watch, 6 was not seen for an individual counseling session with my QMHP.

BRETT FRAIN

Brett Frain

Witnessed by:

Kyle Johnson 

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Lavell Holloway

1. My name is Lavell Holloway. I have been incarcerated in the IDOC since 2012 and I am scheduled to go home on Mandatory Supervised Release in 2025.
2. I have been at Pontiac in the South Mental Health Unit since January 28, 2021
3. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care.
4. In June and July, our groups and yard time were cancelled a lot. I was in my cell most of the time.
5. My mental health groups have continued to be cancelled since then. In August, most of my groups were cancelled. My mental health treatment file shows that my groups were held only on _____; they were cancelled on August 7, 2021
19. I have not received mental health groups since the two in August.


6. I am often not allowed to go to yard. I was often in my cell for 23-24 hours a day. Other than groups, when I am not on crisis watch I only get out of my cell to go to yard twice in August and ~~not at all~~ once in September.
I get to go out to shower three days a week.
I had an individual therapy session on Aug, 19 and monthly psychiatric visits that are sometimes cell front.
7. We do not have dayrooms or any other recreation.
8. Because of all the time locked down in my cell, I don't have anything to keep me busy + my thoughts occupied so I get stuck in my own head which increases my anxiety + stress; both cause me to act out or self-harm as a means to get help + exert some control. The isolation causes me to become emotionally numb. Coping with the hopelessness is difficult especially since it seems like no one at Pontiac cares.
9. On Wednesday, September 22, 2021, I asked for a crisis team response but the staff person refused to get me one. I have been having a hard time because of the lock downs. Inside my cell, I set a fire on my leg. I now have serious burns on my leg and am on crisis watch in the healthcare unit. I feel like I hit bottom. This place is making me do things I don't want to do; to do things that I don't want to do.
10. I have been on crisis watch ~~since~~ from September 22 through September 30.
11. While on watch, my daily assessments with the QMHP have been at cell front.

The only other out-of-cell treatment or activity I have had on watch was

nothing.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 6, 2021.


Lavell Holloway

Witnessed by: _____


Nicole Schult

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Denzel Irons

1. My name is Denzel Iron. I have been incarcerated in the IDOC since 2019 and my Mandatory Supervised Release date is in 2023.
2. I have been at Pontiac in the South Mental Health Unit since April 2021.
3. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. I have been in ~~segregation in~~ the RTU since about September 2020.
4. Because of cancellations of yard and mental health groups, I have often been in my cell for 24 hours a day for the last several months. There are weeks when both yard and groups are cancelled.

5. I am scheduled to attend mental health groups two to three times a week, but that has not been happening.

a. As of September 2, 2021, all of my mental health groups had been cancelled for about two weeks.

b. As of ~~September 28~~ ^{October 6}, 2021, I haven't attended any groups since at least the beginning of August

6. I am supposed to see my QMHP (qualified mental health professional) every 30 days. For those sessions, I see the QMHP Goodwin

7. The only other structured out of cell time offered to me is _____
_____ and that happens about _____ times a month.

8. We are supposed to go to yard three times a week, but that is also canceled a lot. The week of September 2, 2021, our yard was cancelled. Since then,

I've been to yard 2-3 times, for approximately 3 hours each time, total

9. We do not have dayrooms or any other recreation.

10. Last week, I got out of my cell for for 2 15 minute showers.

I didn't have yard or mental health groups last week.

11. Because of all the time locked down in my cell, my mind races because I

don't have anything to keep me busy, which increases my anxiety. I have increased depression because I can't socialize

or get emotional support from my friends in my cell house.

Being isolated + not getting out of my cell makes me want to "bug up" and act out to get attention and to protest all the time we're stuck in our cells + not going outside to yard at all.

Assaults on the gallery have increased, which gets me to thinking that I should act out as it might be a means to take some control of my situation.

I have also gained 20 pounds because I can't exercise

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 6, 2021.


Denzel Irons

Witnessed by:


Nicole Schultz

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Jonathan Lankford

1. My name is Jonathan Lankford. I have been incarcerated in the IDOC since December 2012, and my Mandatory Supervised Release date is in October, 2043.

2. I have been at Pontiac in the North House Modified Treatment Center (MTC) since February 4, 2020

3. I am designated as General Population (GP) and Residential Treatment Unit (RTU) level of care. I was in segregation in the RTU FROM about February 4, 2020 to June 6, 2021

4. Because of cancellations of yard and mental health groups, I have often been in my cell for 24 hours a day for the last several months. There are weeks when both yard and groups are cancelled.

5. I am scheduled to attend mental health groups 3 times a week.
- a. As of September 2, 2021, I was being provided 3 hours a weeks of group time.
 - b. As of October 6, 2021, I have only attended 8 groups this past month because of lack of staff and other inmates being prioritized.
6. I am supposed to see my QMHP (qualified mental health professional) every 30 days. For those sessions, I see the QMHP ~~DR. CAROL BANNER~~ Banner.
7. The only other structured out of cell time offered to me is yard time
when there is enough staff
and that happens about 3 times a month.
8. We are supposed to go to yard three times a week, but that is also canceled a lot
The week of September 2, yard (was) was not canceled. Since then, lock downs
have prevented attendance for yard
except for on 3 occasions
9. We do not have dayrooms or any other recreation.
10. Last week, I got out of my cell for yard on Monday
and showers

11. Because of all the time locked down in my cell, I am unable to
fulfill my religious obligations. I am
unable to attend schooling. Being
locked in the cell for days at a time
has increased my anxiety and
makes me feel stiff from lack of
movement.

12. On June 3rd, I was placed on crisis watch. I spent about 4 days
on watch.

13. While on watch, my daily assessments with the QMHP were cell front
occasionally in a soothing room.

The only other out-of-cell treatment or activity I had on watch was none

14. The week after I came off of crisis watch, I ~~was~~ was not seen for an individual counseling
session with my QMHP. I was seen 2 or 3 weeks
later

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 6, 2021.


Jonathan Lankford

Witnessed by: Kyle Johnson 

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION**

ASHOOR RASHO, et al.,)	
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Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
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v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Curtis McTizic

1. My name is Curtis McTizic. I have been incarcerated in the IDOC since 2014 with a mandatory supervised release date in 2029. I have been in the South Mental Health Unit at Pontiac since January 2021.
2. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. I am general population status in the RTU.
3. Because of cancellations of yard and mental health groups, I have often been in my cell for 23 or more hours a day for the last several months. There are weeks when both yard and groups are cancelled. We do not even always get our showers.
4. I do not receive ten hours of structured out of cell time each week even though I am in RTU level of care.
5. As of September 2, 2021, I had not been to any mental health groups in about 3 weeks because they kept being cancelled. Lately, the mental health groups have been cancelled. I have not been to group in a month. Groups have been cancelled a lot for many months.

6. We are supposed to go to yard three times a week. As of September 2, 2021, yard had been cancelled for two weeks. Since then, yard gets cancelled every week. We get one yard a week at most.
7. We do not have dayrooms or any other recreation.
8. I am in general population (not segregation) but we have not been allowed to go have meals in the dining room.
9. Last week, I did not get out of my cell. We did not get showers, group, or yard.
10. Because of all the time locked down in my cell, I'm getting worse and different mental illness. The walls are closing in on me. Sometimes I hit the wall or hurt myself. It is making me worse. It is all building up in me.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 10-5, 2021.


Curtis McTizic



IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Jason Murray

1. My name is Jason Murray. I have been incarcerated in the IDOC since 2003, when I was 21 years-old. I am scheduled to go home on Mandatory Supervised Release on November 21, 2022.

2. I have been at Pontiac in the South Mental Health Unit since December 19, 2020.

3. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. I have been in segregation in the RTU since about June 21, 202.

4. Because of cancellations of yard and mental health groups, I have often been in my cell for 23 or more hours a day for the last several months. There are weeks when both yard and groups are cancelled. Mental health staff check on us at cell front. The only out of cell time regularly provided is showers three times a week, and that is only when the facility is not on Level 1 Lockdown. Staff often try to convince us to give up our showers in exchange for extra meal trays.

5. I am on the schedule to attend two mental health groups a week, but often do not get to go because of cancellations.
 - a. As of September 2, 2021, I had not had a mental health group since July 2021.
 - b. As of September 28, 2021, I still have not had a mental health group since July 2021.
6. Correctional officers come and tell us that our mental health groups are being cancelled and most of the time the mental health staff do not come to inform us about the cancellations.
7. I am supposed to see my QMHP (qualified mental health professional) every 30 days.
8. During Level 1 Lockdowns, they do not take us out of our cells for other mental health treatment like sick call, requests for crisis response, and crisis assessments. Even when we aren't on lockdown, my visits with my QMHP and other mental health staff are all cell-front.
9. The only other structured out of cell time offered to me was a visit with the psychiatrist last week, which was also held cell-front and not confidential.

10. We are supposed to go to yard three times a week, but that is also canceled a lot. At best, we usually might get one yard a week.

For example, the week of September 2, 2021, our yard was cancelled. Since then, yard has only been run once per week.

11. We do not have dayrooms or any other recreation.

12. Because of all the time locked down in my cell, I feel trapped, like the walls are caving in on me. Between the chaos around me and being surrounded by my thoughts, I feel hopeless and doomed. The only way to stretch my legs and talk to mental health is by calling a crisis team.


13. On July 12, 2021, I was placed on crisis watch. I spent 4 days on watch. On September 8, 2021, I was placed on crisis watch again, and I was discharged from that watch on September 14, 2021.

14. While on watch, my daily assessments with the QMHP were out-of-cell on weekdays and at cell front on the weekend. I did not have any other out-of-cell treatment or activity while on watch.

15. The week after I came off of crisis watch, I was seen for an individual counseling session with my QMHP, but it was at cell-front.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September ____, 2021.


Jason Murray

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v,)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member ^{Dante} ~~Deonte~~ Patterson

1. My name is ^{Dante} ~~Deonte~~ Patterson. I have been incarcerated in the IDOC since 2010 and my Mandatory Supervised Release date is in 2030.
2. I have been at Pontiac in the South Mental Health Unit since February 1, 2021
3. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. I have been in the RTU since about 2016.
4. Because of cancellations of yard and mental health groups, I have often been in my cell for 22-24 hours a day for the last several months. There are weeks when both yard and groups are cancelled.

5. I am scheduled to attend mental health groups two to three times a week.
- a. As of September 2, 2021, all of my mental health groups had been cancelled for about two weeks.

b. As of ^{Oct 6}~~September 20~~, 2021, I have not been to any groups since mid August 2021.

6. I am supposed to see my QMHP (qualified mental health professional) every 30 days. For those sessions, I see the QMHP Kray
But it has been months since I had an individual one-on-one MHP session.

7. ~~The only other structured out of cell time offered to me is~~
I don't receive any other structured out of cell time.
~~and that happens about~~ _____ ~~times a month~~

8. We are supposed to go to yard three times a week, but that is also canceled a lot
The week of September 2, 2021, our yard was cancelled. Since then,

I've been to yard only 3-4 times total. I was recently told that we would only be offered yard once a week on Sundays. The yard on October 3 (Sunday) was cancelled.

9. We do not have dayrooms or any other recreation.

10. Last week, ~~I got out of my cell for~~ I didn't get out of my
cell at all.

11. Because of all the time locked down in my cell, it's a struggle to be so isolated. I
need help to handle a lot of the issues that were caused by the long time
I've spent in segregation. I think about hurting myself + others every day.
I am increasingly more angry. I suffer physical pain in my chest + more headaches

12. I was placed on crisis watch from around 9/13/2021-9/17/2021 and
9/30/21- 10/4/2021. While on watch, my daily assessments with the
QMHP were cell front. I did not receive any out-of cell
treatment or activity while on watch.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 6, 2021.



Donte Patterson

Witnessed by: 
Nicole Schult

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION**

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Ronald Patterson

1. My name is Ronald Patterson. I have been incarcerated in the IDOC since 2010, when I was 18 years-old.

2. I have been at Pontiac in the South Mental Health Unit since August 2020.

3. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. On about July 25, 2021, I was placed on segregation status in the RTU.

4. Because of cancellations of yard and mental health groups, I have often been in my cell for 23 or more hours a day for the last several months. There are weeks when both yard and groups are cancelled. Mental health staff check on us at cell front instead of having out of cell treatment. The only out of cell time regularly provided is showers three times a week.

5. I am on the schedule to attend mental health groups, but often do not get to go.

a. As of September 2, 2021, I had not been pulled out for mental health groups in about two and half weeks. In August, I went on crisis watch several times because that was the only way to get any mental health treatment.

b. As of September 28, 2021, I have been on watch again since last Thursday (5 days), but before that my groups were cancelled.

6. No other structured out of cell time offered to me. My treatment plan says I am supposed to have individual counseling but that does not happen. The QMHP and psychiatrist come to the cell front. I refuse to talk to them cell front because other people can hear.

7. We are supposed to go to yard three times a week, but that is also canceled a lot. For example, the week of September 2, 2021, our yard was cancelled. Since then, I have not been to yard. They put me on "yard restriction" for a disciplinary ticket on July 25, 2021.

8. We do not have dayrooms or any other recreation so I have no unstructured out-of-cell time other than showers.

9. Because of all the time locked down in my cell, I have been self-harming and going on watch. I need to get out of my cell because in my cell I have negative thoughts that I cannot get away from.

10. I have been placed on crisis watch multiple times since July 2021.

11. While on watch, my daily assessments with the QMHP are cell front. There is no confidentiality to speak about my mental health issues.

12. When I have come off of crisis watch, I have not been seen for an individual counseling session with my QMHP. The only follow-up is the daily assessment on the day they let you off of crisis watch.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 2 2021.


M16553
Ronald Patterson

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION**

ASHOOR RASHO, et al.,

Plaintiffs,

v.

ROB JEFFREYS, et al.,

Defendants.

)
)
) No. 1:07-CV-1298-MMM-JEH

) Judge Michael M. Mihm
)
)
)

Declaration of Class Member Jacob Pitts

1. My name is Jacob Pitts. I have been incarcerated in the IDOC since 2020 and my Mandatory Supervised Release date is December 20, 2024.
2. I have been at Pontiac in the South Mental Health Unit since June 10, 2021.
3. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. I have been on segregation status in the RTU since about June 2021, with the exception of September 3 to 10th, 2021, when I was briefly in general population.
4. Because of cancellations of yard and mental health groups, I have often been in my cell for 23 or more hours a day for the last several months. There are weeks when both yard and groups are cancelled. Mental health staff check on us at cell front. The only out of cell time most consistently provided is showers three times a week.
5. I am on the schedule to attend mental health groups, but often do not get to go.
 - a. As of September 2, 2021, I was getting to go to a mental health group about once a week for a total of about two hours.

- b. As of September 28, 2021, I have not had any groups for at least 30 days.
- c. When group is not cancelled, security staff sometimes bring meal trays at the same time as our mental health groups. We have to choose between eating the meal warm or going to group.
6. The only other structured out of cell time offered to me is one daily assessment during crisis watch yesterday,
~~and that happens about _____ times a month.~~ September 27, 2021.
All other daily assessments since I went on crisis watch on September 23, 2021, have been conducted cell-front without a confidential, out-of-cell option.
7. We are supposed to go to yard three times a week, but that is also canceled a lot. We ~~are~~ ^{were} lucky to get to go to yard once every week or two, prior to September.
During the month of September, I have not been offered yard at all.
8. We do not have dayrooms or any other recreation.
9. Last week, I got out of my cell for moving to crisis watch placement - nothing else.

10. Because of all the time locked down in my cell, I feel anxious and lethargic. The lack of physical recreation has effected me physically. Without anything to do, I'm left to ruminate on problems and distresses.

11. On July 30, 2021, I was placed on crisis watch. I spent 19 (days) weeks on watch. I also went on crisis watch on September 23, 2021 and am currently on watch. I also was on crisis watch from September 10 to 14, 2021.

12. While on watch, my daily assessments with the QMHP were almost all conducted cell-front.

The only other out-of-cell treatment or activity I had on watch was nothing.

13. The week after I came off of crisis watch, I was was not seen for an individual counseling session with my QMHP. Despite coming off watch on September 14, I was not seen by the QMHP until September 23, and it was a non-confidential, cell-front session with a security officer present.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 28, 2021.

Jacob P. Pitts
Jacob Pitts

Witnessed by: Samantha Reed

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Derrick Scaggs

1. My name is Derrick Scaggs. I have been incarcerated in the IDOC since 2018 and I am scheduled to go home on Mandatory Supervised Release in two years, on December 22, 2023.
2. I have been at Pontiac in the South Mental Health Unit since January 2021.
3. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care.
4. In June and July, our groups and yard time were cancelled a lot. I was in my cell most of the time.
5. On July ~~23~~²⁵, 2021, we were able to go out to the yard. I got into a fight with another prisoner. In the disciplinary case for the fight and for not following an order to cuff up, I was given three months of segregation time, yard restriction, lost visitation, and lost good time credit.

6. My mental health groups have continued to be cancelled since then. In August, most of my groups were cancelled. My mental health treatment file shows that my groups were held only on August 19 and 25; they were cancelled on August 3, 9, 10, 13, 16, 17, 18, 20, ~~23~~, 24, 27, 30, and 31. I have not received mental health groups since the two in August.

7. Because of the disciplinary incident on July 25, they will not let me go to yard. Even before I went on crisis watch, I was often in my cell for 23-24 hours a day. Other than groups, when I am not on crisis watch I only get out of my cell to go to

Shower on Mondays, Wednesdays + Fridays

8. We do not have dayrooms or any other recreation.

9. Because of all the time locked down in my cell, I am more frustrated since I can't get out. My anxiety has increased + I pace my cell a lot. I am more impulsive + angry which makes it more likely that I will act out + get in trouble. I have more feelings of self-harm just so I could have a possibility of getting out of my cell

10. On Wednesday, September 22, 2021, I asked for a crisis team response but the staff person refused to get me one. I have been having a hard time because of the disciplinary case and the lock downs. Inside my cell, I set a fire on my leg. I now have serious burns on my leg and am on crisis watch in the healthcare unit. I feel like I hit bottom. This place is making me do things I don't want to do; to do things that I don't want to do.

11. I have been on crisis watch ~~since~~ ^{from} September 22nd and was on crisis watch in August ^{through October 1st}.

12. While on watch, my daily assessments with the QMHP have been at cell front.

The only other out-of-cell treatment or activity I have had on watch was

nothing

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 6, 2021.



Derrick Scaggs

Witnessed by:



Nicole Schult

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

ASHOOR RASHO, et al.,)	
)	
Plaintiffs,)	No. 1:07-CV-1298-MMM-JEH
)	
v.)	Judge Michael M. Mihm
)	
ROB JEFFREYS, et al.,)	
)	
Defendants.)	

Declaration of Class Member Denzel Walker

1. My name is Denzel Walker. I have been incarcerated in the IDOC since 2014 and I have been in the South Mental Health Unit at Pontiac ~~since~~ for 2 years.
2. I am designated as seriously mentally ill (SMI) and Residential Treatment Unit (RTU) level of care. I have been on segregation status in the RTU since about June 2021.
3. Because of cancellations of yard and mental health groups, I have often been in my cell for 23 or more hours a day for the last several months. There are weeks when both yard and groups are cancelled. Mental health staff check on us at cell front. The only out of cell time most consistently provided is showers three times a week.
4. I do not receive ten hours of structured out of cell time each week even though I am in RTU level of care and segregation.

[Type here]

[Type here]

5. I am scheduled to go to groups twice a week for two hours at a time. If both groups are not cancelled, I get about 4 hours of structured out of cell time a week. Lately, the mental health groups have been cancelled. I last went to mental health group 5 weeks ago. I do not refuse to go, they are cancelled.
6. The only other structured out of cell time offered to me is my one on one with my QMHP, ~~that~~ and that happens about one ~~to~~ (1) time a month.
7. We are supposed to go to yard three times a week for three and half hours each time (8:30 am to 12:00 pm), but that is also canceled a lot. As of September 2, 2021, we only ^{had} yard twice in two weeks. Since then, I have maybe been allowed to go to yard twice. In the last week, all the yard has been cancelled.
8. We do not have dayrooms or any other recreation.
9. Last week, I only got out of my cell for showers (3x week) and when I called for a crisis team. But usually when we ask for a crisis team response they have been doing cell front too.

[Type here]

[Type here]

10. Because of all the time locked down in my cell, I feel trapped.
I get paranoid. It makes me want
act out to make something happen.
I feel very agitated. Yesterday I got
tickets for staff assaults ~~because~~ because
of this. I have hardly been out of
my cell for 5 weeks.

*I also overdid
on pills
yesterday.*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September __, 2021.

Denzel Walker

Witnessed by: _____

11. On 9/27 I was placed on crisis watch. I spent days/weeks on watch.
This is the first time I have been on watch
in over a year.

12. While on watch, my daily assessments with the QMHP were
It has only been one day, I have not
The only other out-of-cell treatment or activity I had on watch was had
an assessment or other treatment
since being placed on watch
yesterday afternoon.

13. ~~The week after I came off of crisis watch I was/was not seen for an individual counseling
session with my QMHP.~~

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 28, 2021.

Denzel Walker
Denzel Walker

Witnessed by: [Signature]