

## FACTUAL ALLEGATIONS

### **A. COVID-19 Is Highly Infectious and Dangerous**

### **B. COVID-19 is Causing a Crisis in Prince George's County**

Because the majority – 64 percent – of Prince George's County is Black, the people of Prince George's County are more susceptible to COVID-19 than other counties across the state.

### **C. Jails and Prisons Are Exceedingly Vulnerable to COVID-19**

Containing this virus has been difficult in the community and it is almost impossible in correctional health settings. As a result, people will die behind bars of coronavirus who would have survived in the community.

### **D. There is a COVID-19 Outbreak at the Prince George's County Jail**

As one prisoner described it, "I feel like everyone in the unit is catching it...[I]t seems like almost everyone is sick."

### **E. The Jail Has Not Taken Basic Precautions to Prevent the Spread of COVID-19**

Jail staff do not regularly clean and sanitize shared amenities. The Jail's limited attempts at social distancing measures are markedly careless. Jail guards and medical staff routinely disregarded prisoners' COVID-19 symptoms.

### **F. The Jail's Limited Containment Methods Are Ineffective and Counterproductive**

Prisoners must remain in their cells for 23 hours per day. The lockdown policy traps prisoners in close proximity to people who may be sick.

### **G. The Jail's Conditions Increase the Risk of Severe Illness and Death**

Sick prisoners in general population lack access to medical care. Some who have made sick calls were seen by medical staff weeks later or not at all. The Jail has discontinued mental health services.

## FACTUAL ALLEGATIONS [cont.]

### **H. The Jail Has Failed to Effectively Manage Positive Cases of COVID-19**

Prisoners who are to be tested for COVID-19 are placed in medical isolation cells. The cells are filthy. For up to five days, prisoners have no soap and no toothbrush. They are not allowed to shower. They cannot change their clothes, even as they are soaked in sweat.

### **I. The Jail Maintains an Overdetention Policy for Prisoners with COVID-19**

Although the Jail has failed to control the outbreak within its walls, it has resorted to unlawful means to control the virus's spread outside of them: the Jail refuses to release COVID-positive prisoners who have paid bail (or are otherwise legally entitled to release) until it deems them non-contagious. ■