

Exhibit 37-15

SUPPLEMENTAL DECLARATION OF ANTHONY SWAIN

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

1. My name is Anthony Swain. I am 43 years old. I am incarcerated at the Metro West Detention Center in Miami, Florida in cell 1D2. I am concerned for my safety and for the safety of other people who are incarcerated with me as well as the officers who work in this jail.
2. There is a lot of movement in and out of my cell, and I think that is one of the reasons why the virus is spreading so quickly throughout Metro West. Officers continue to go back and forth between the quarantined cells and my cell. For example, on Sunday, April 12th, nurses from my cell put their shield and protective gear on before going into 1D4, which was on quarantine at the time. After spending time in the quarantined unit, they came right back into my cell, passing all of the bunks, and walked back to their office inside of my unit. They took their protective gear off in their office, and then trashed it in the common trash can inside of my cell.
3. Additionally, on April 16, there was a fight in 1D4, which was on quarantine at the time. All of the officers from my unit ran over to 1D4 without any protection, through the bathroom door that connects 1D2 and 1D4. When they came back to my cell, they didn't change their clothes or their gloves. They also brought back the belongings of someone from the quarantined cell into my cell, including his purge bag, which is a plastic bag where we keep our belongings like our food and clothes. They were sorting through his stuff at their desk in my cell and were making note of his personal property before they moved him to another unit.
4. There are also officers and nurses who walk throughout the building, from cell to cell, on a frequent basis. On April 20 in the afternoon, a nurse named Mrs. Green came into my cell to take temperatures of people who are on a list. She was wearing a full yellow medical gown and a shield. I had never seen her before so I asked her where she was coming from. She said she was a nurse and that she's taking temperatures in all of the units. She came in here without changing any of her clothing, and she didn't change her gloves.
5. Similarly, around 1:30-2:00 am on April 21, someone from my cell who I've known for about three years left to go to federal prison. He was transported on a bus with about 60 people. The federal penitentiary wasn't accepting anyone from any jail at the time and so the group of prisoners were returned back to TGK. At TGK they were all housed in a cell together before being dispersed back to their original jails. The person from my cell got back to my cell on Tuesday morning at around 10:30 am and told me that there were two

people on the bus who had coronavirus. I saw him get called to the clinic at Metro West that same day and when he got back to my cell about twenty minutes later, he told me that he had gotten his mouth swabbed to test for coronavirus. The nurses have been wearing yellow medical gowns in my cell since then, and they said it's because of his situation.

6. At the time I am giving this declaration, three days later, he remains in my cell. He is not isolated from the rest of us. He continues to share the same table, bathroom, TV, water cooler, the hand soap bottle. I have even seen him at the tables gambling with other immuno-compromised people in here since he got back. We, people who are incarcerated in this cell, haven't been given gowns or tests or any form of protection while he waits for his test result and we aren't able to maintain distance from him.
7. Finally, we started having mandatory rec time a few weeks ago. During rec time, none of the officers have told us what cell shares the yard with us, despite the fact that people talk and greet each other through the chain link fence that separates the yard.
8. On top of that, social distancing is still impossible in my cell, which makes the cell a breeding ground for the virus. Right now, there are three people crowded around the TV in the common area. In the bathrooms, the toilets, sinks, and showers are made out of stainless steel, which I've heard is where the virus can live for multiple days. MDCR only cleans them once or twice a week.
9. The soap bottle is like a lotion bottle with a dispenser that you have to press in order for the soap to come out. That bottle is sitting on the officer's desk, and everyone in the cell uses it. The dispenser has never been cleaned, and the daily cleaning supplies remain watered down. We still don't have access to any kind of detergent to clean high-touch areas of our cell.
10. I noticed changes in my unit, especially right before the inspection that occurred this past Saturday. Prior to the inspection of the unit, a sergeant came into the unit and I heard him notify the officers of the inspection. A short time after this, officers began to scrub the unit down and move the beds around. When the inspector came, I started to approach them to talk to them, and the corporal turned around and shunned me off, saying that they are not here to answer your questions. I asked her if I could please just ask one question, and she shook her head and told me that if I tried to say anything to them, she'd lock me up, meaning she'd put me in a disciplinary holding cell.
11. One of the nurses told me soon after the lawsuit was filed, "I thank you because if we had said the same thing, we would have lost our job." A couple of officers also told me that they appreciate me for speaking up, and said that if they file complaints and grievances about things going on in the jail, they just get moved from the working position that

they're in to a different working position or to a different jail. One of the officers told me on the elevator, "it took an inmate for all of this stuff to happen? Why did it have to take an inmate?"

This declaration was orally sworn to by Anthony Swain on April 24, 2020 because the Metro West Detention Center is currently not permitting documents to be exchanged for signature.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Anthony Swain on April 24, 2020.

A handwritten signature in black ink, appearing to read 'Maya Ragsdale', with a horizontal line extending to the right.

By:

Maya Ragsdale

Date: April 24, 2020