

**Affidavit of Christina Lorenzo on Behalf of Andjine Doret for Brandon Mathis**

My name is Christina Lorenzo. I am the Intake Coordinator at the Chicago Community Bond Fund. On April 2, 2020, I spoke to Andjine Doret, who provided me the following information about Brandon Mathis, her partner, who is a detainee in the Cook County Jail.

1. Mr. Mathis is 26 years old. He resides in Division 11 of the Cook County Jail. He is incarcerated on a \$40,000 D Bond that he cannot afford to pay.
2. Mr. Mathis was previously shot in the throat, and his throat was reconstructed, making it hard for him to breathe. He had open heart surgery when he was a child. He suffers from blood clots and swelling in his feet, but he is not receiving medication.
3. Mr. Mathis is living in a cell with another cellmate. Mr. Mathis sleeps on the lower bunk. The cell has not been cleaned.
4. Social distancing is not possible in the division. All detainees are close together when they are in the common room, on the phones, or in the dayroom.
5. The detainees in the division share a shower area. The shower area has not been sanitized.
6. Mr. Mathis has not been given soap or sanitizer. Detainees are not being given personal protective equipment (PPE).
7. Two men in the division got sick with the virus (COVID-19). Both were transferred off the deck. Mr. Robinson does not know what happened to them.
8. Two people tested positive for COVID-19 on the deck across from Mr. Mathis. Jail staff took the belongings of those individuals and threw them out, and then sanitized the cell.
9. Mr. Mathis has not been tested for COVID-19 but he has started to feel sick. He feels hot and like he cannot breathe, and suffers headaches.

I am providing this hearsay declaration because of restrictions on visitors and contact with detainees in the Cook County Jail. I declare under penalty of perjury that the foregoing is true and correct.

April 2, 2020  
Chicago, Illinois

s/ Christina Lorenzo  
Christina Lorenzo