

Affidavit of Matthew McLoughlin on Behalf of Mary Hayes for Christopher Zeigler

My name is Matthew McLoughlin. I am the Director of Programs at the Chicago Community Bond Fund. On April 1, 2020, I spoke to Mary Hayes, who provided me the following information about Christopher Zeigler, Ms. Hayes' fiancé, who is a detainee in the Cook County Jail.

1. Mr. Zeigler is 24 years old. He is residing in Division 6 of the Cook County Jail. He is incarcerated on a \$100,000 D Bond that he cannot afford to pay.
2. Mr. Zeigler has MRSA and a compromised immune system.
3. Mr. Zeigler is residing in a one-person cell on his division, however, there are only 6 single person cells in the division. The rest are double occupancy. There are two levels of cells in Mr. Zeigler's division. The entire division is being quarantined.
4. Because they are in quarantine, all people in this division are on lock-down. Detainees are let out of their cells for three hours per day.
5. Yesterday, detainees refused to lock up in their cells because they wanted more time out and they were not being given a clear explanation by guards as to what is happening in the jail. All the detainees who initially refused to lock up were threatened with mace. A sheriff's deputy told Mr. Zeigler and others that since they refused to lock up, they would not be tested for COVID-19.
6. Every detainee in this division shares a shower. There are three showers shared by everyone. Five or six cells of detainees are allowed out at a time to share the shower area. Everyone in the unit shares the same sinks.
7. Mr. Zeigler works to clean up the tier. There are no more Clorox wipes for cleaning. They have not received the normal chemicals to clean the shower stalls. Mr. Zeigler has observed black mold in the shower area.
8. Some nurses and medical staff are wearing protective gear. But detainees have not received any personal protective equipment (PPE).

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/ Matthew McLoughlin
Matthew McLoughlin