

Affidavit of Tyneshia Perkins

My name is Tyneshia Perkins. I was detainee in the Cook County Jail until I was released on March 26, 2020.

1. Until recently, I resided in Division 5, Tier 2D of the Cook County Jail. There were 40 women on the deck and two women per cell. The division was moldy and there were bugs everywhere.
2. I shared a cell until the time I left. The cell was approximately 8 feet by 6 feet. The only way to be separate from my cellmate was to both be in our beds. I slept on the upper bunk. We shared a toilet and sink in the cell. We could stay separate in the day room.
3. There were 6 showers, but 3 showers were broken, so the 40 women mostly shared 3 showers. There were 3 toilets and one sink with 3 faucets in the common area.
4. When the city went on lockdown, the food changed. There were several days where we only received bread and no longer got milk with dinner. There were 3 tables in the dayroom, with 5 or 6 people sitting at each table for meals. If you came to eat during the second shift, the food would have been sitting out for a while. Occasionally, we received meals in our cells.
5. We received one small bar of soap each week. If we wanted more soap or other hygiene products, we had to buy them. I had to buy my own soap because I have sensitive skin from eczema.
6. By the time I left, I did not witness any procedural changes in response to COVID-19. We did not receive a lot of information about the pandemic. We did not receive additional hygiene or sanitation supplies.
7. Some guards wore gloves and masks but not all of them did. Detainees did not receive masks, gloves, or other personal protective equipment (PPE). The officers told us that if we made our own masks, they would be considered contraband.

I declare under penalty of perjury that the foregoing is true and correct.

April 3, 2020
Chicago, Illinois

s/ Tyneshia Perkins
Tyneshia Perkins