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VIA EMAIL ONLY

December 16, 2020

Mr. Timothy Bojanowski
Struck, Love, Bojanowski & Acedo, PLC
3100 West Ray Road, Suite 300
Chandler, AZ 85226
tbojanowski@strucklove.com

RE: *Parsons v. Shinn*, 2:12-CV-00601
COVID-19 Practices at ASPC-Florence, East Unit

Dear Mr. Bojanowski:

We recently received reports of COVID-19 positive patients being housed with COVID-19 negative patients in ASPC-Florence's East Unit. We would appreciate additional information about how Florence is testing people for COVID and placing them in quarantine or isolation, as set forth below.

Dorm 1

According to reports from class members in East Unit, 18 of 39 incarcerated persons in Dorm 1 tested positive for COVID-19 in mid-November. All 18 class members appeared on Ms. Hesman's November 24, 2020 weekly report of class members who tested positive for COVID-19. *See* Exhibit A.

According to eOMIS, these 18 class members were tested on November 11, 2020, and their results became available on November 14. It does not appear that medical staff recorded encounters with these class members between November 11 and November 14, 2020, or recorded encounters unrelated to COVID-19. *See* Exhibit B. There is no mention in the medical records of why these class members were tested, whether they should have been quarantined pending results and how/if they were subsequently isolated when they tested positive. The only indication of any possible isolation is a provider review note from November 16, 2020, that states, "Isolation of I/M until cleared." A similar note appears in all 18 class members' medical records. *See* Exhibit C. The provider review notes do not explain where these 18 class members were isolated.

Hut 2 (Charlie Cluster)

According to recent reports from class members on East Unit, eleven people living in Charlie Cluster are currently quarantining in place. Because we are not produced a list of class members on quarantine, we cannot confirm if COVID-19 positive class members are housed in Charlie Cluster at this time. However, we do know of one person who lives in Charlie Cluster: [REDACTED]

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According to [REDACTED]'s medical records, he was seen by medical staff on November 20 and November 27, 2020, for a "Segregation Visit" on East Unit. These are the only two recorded "Segregation Visits." According to these encounters, [REDACTED] was on quarantine for COVID-19 exposure. His medical records do not list that he has been tested for COVID-19. *See Exhibit D.*

Hut 8 (Fox Cluster)


Similarly, according to class member reports, eight people in Fox Cluster were quarantined together. Six of eight were subsequently moved to Kasson Unit for isolation. *See Exhibit A.* However, prior to being moved, these six class members were allowed to attend work, school, and program with the general population. According to one report, class members in Fox Cluster were allowed to eat chow with everyone else until the day before the whole unit was placed on a precautionary quarantine because the test results from Fox Cluster had come back.

Given the above information, we request responses to the following questions:

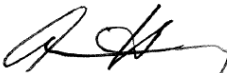
1. How often are class members at Florence – East Unit tested and under what circumstances? Was everyone in Dorm 1, Hut 2, and Hut 8 tested for COVID-19? Why or why not?
2. What measures were taken to isolate and separate the 18 class members in Dorm 1 who tested positive for COVID-19? Were these class members housed in Dorm 1 or moved elsewhere on East Unit? Were they sharing airspace with anyone who had not yet been tested or tested negative for COVID-19?
3. According to eOMIS, at least one person in Hut 2 was placed on quarantine for exposure to COVID-19. Were others in Hut 2 also placed on quarantine? Why or why not? If Hut 2 was placed on quarantine, were class members quarantined separately, in small cohorts, or all together in a shared airspace?
4. Are people who have been tested in East Unit due to a possible exposure or COVID symptoms allowed to interact with the general population while awaiting their test results? What is the protocol while someone awaits test results, are they quarantined until the results are returned?

Thank you for your prompt attention to this matter.

Sincerely,



Tania Amarillas
Investigator



Alison Hardy
Senior Staff Attorney