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## STATEMENT OF THE CASE

### **There is an uncontrolled outbreak of COVID-19 at the Prince George's County Jail.**

The Jail's actions fueled this outbreak, and it has also failed to take appropriate action in response.

The people housed there—predominantly pretrial detainees—are under a constant and substantial threat of contracting the disease, and those already infected receive grossly substandard medical treatment (if they receive treatment at all).

Because jails are particularly vulnerable to COVID-19, the CDC has recommended basic measures these facilities should take to control the spread of the virus and treat infected prisoners—for example, providing prisoners with free access to soap and evaluating prisoners for symptoms.

The Jail has ignored these and other public health recommendations.

As a result, the nearly 600 people now imprisoned at the Jail are denied even the minimal precautions necessary to mitigate against the risks of COVID-19.

The people confined in the Jail regularly wait a week or more for medical attention. The spaces they share with other prisoners are not adequately sanitized. They are denied basic hygienic supplies. Symptomatic inmates are regularly turned away by medical staff, returning to general housing where they will surely infect others.

Prisoners who test positive for COVID-19 are confined in filthy isolation cells, where the walls are covered in feces, mucus, and blood. They are barely monitored and receive no real treatment.

By maintaining these conditions, Defendant McDonough has needlessly exposed the people imprisoned in the Jail to a highly infectious and potentially fatal disease. This violates prisoners' Eighth and Fourteenth Amendment rights. ■