

No. 98317-8

SUPREME COURT OF THE STATE OF WASHINGTON

SHYANNE COLVIN, SHANELL DUNCAN, TERRY KILL, LEONDIS
BERRY, and THEODORE ROOSEVELT RHONE,

Petitioners,

v.

JAY INSLEE, Governor of the State of Washington, and STEPHEN
SINCLAIR, Secretary of the Washington State Department of Corrections,

Respondents.

DECLARATION OF JASON STREIFF

Nicholas Allen, WSBA #42990
Nicholas B. Straley, WSBA #25963
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Attorneys for Petitioners

I, Jason Streiff, do hereby certify and declare as follows:

1. I am an inmate at Coyote Ridge Corrections Center in Connell, Washington. My DOC # is 417934.
2. In 2019, I was sentenced to 54 months in prison. My case is currently on direct appeal to Division Two of the Court of Appeals. On May 8, 2020, the superior court denied my motion for release pending appeal.
3. Conditions in Coyote Ridge are currently horrendous. Because COVID-19 is spreading through the prison, since around June 11th, I have been locked down in my cell. At first, we were locked in for 48 hours and then we were locked in 23 hours and 40 minutes a day. Currently, we are locked in 23.5 hours a day. I share the cell with three other people with no bathroom and no inside water. In the half hour that I am let out of my cell, I have to shower, use the toilet, make phone calls, use the microwave and get more water and ice. I have not been outside in fresh air for over a month. I have not had any exercise at all.
4. Food is brought to us in the cell two times a day. We are supposed to get two hot meals a day but by the time the food comes it is cold. We currently get four 16 oz bottles of water in the cell during the whole day. If I need more water to drink, we have to get it when we are let out.
5. Inside the cell, there is no social distancing possible at all. The cell is very small with two sets of bunk beds with a table in between the bunks.
6. Twice time a day, someone from medical comes by and takes our temperature. One of my cell mates was taken out yesterday because he had a temperature.
7. My cell lacks a toilet and a sink. The toilets and sinks are located outside on the tier. If I need to go to the toilet during the day, we have to make a request to a guard or another prisoner and wait for someone to tell us we can go to the bathroom. Sometimes it has taken up to an hour and a half before we can go to the bathroom.
8. Between those limited times to access a toilet, there are times when I cannot help myself and I have to urinate into a small bottle. My other cell mates have done the same thing, and the smell inside the cell is not good.

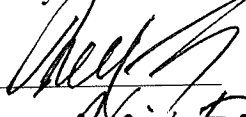
I certify and declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

I cannot sign this document as I am in Connell, Washington, and my lawyer is in Seattle, but it has been read to me and I consent to him signing it on my behalf.

DATED this 19th day of June 2020 at Connell Washington.



Jason Streiff

by 
No. 174