

We the following declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct:

1. We are over the age of eighteen (18), are of sound mind, willfully and voluntarily make this declaration and would testify in court to these statements.
2. We are current sheltered in the Emergency Non-Congregate Sheltering (COVID-19) Program (hereinafter “Equus”) at the Fairfield Inn (located at 3900 Old Town Ave. San Diego, CA 92110) and/or Comfort Inn (located at 2380 Moore St, San Diego, CA 92110).
3. We are under the care and support of Equus Work Force Solution (formally known as ResCare Workforce Services)
4. We meet the definition of “chronically homeless” as defined by the regulations issued by the U.S. Department of Housing and Urban Development (HUD). 24 C.F.R. § 91.5(1).
5. We were verbally advised by employees of Equus that our present sheltered situation was permanent until they found us permanent housing.
6. We have been subjected to unethical conduct by employees of Equus.
7. We did not receive the proper trained care, support services and assistance from employees of Equus, including but not limited to: housing, mental health, drug and/or alcohol assistance, medical care and/or welfare benefit connection.
8. We have been subjected to unhealthy and unsafe living conditions. For example, the unreasonable exposure to COVID-19 given that Equus failed to do COVID-19 testing on new sheltered entries, Equus employees and security here at the Fairfield Inn and/or Comfort Inn. Further, Equus also failed to properly check the severities of new entries psychological stability and criminal histories prior to intermixing entries together at the motels.
9. We fear retaliation from Equus in exercising our First Amendment right to seek redress of these and/or other grievances against them.
10. As a result of Equus conduct we have unreasonably been subjected to emotional distress, e.g., nightmares, anxiety, depression.
11. We are unversed in the law and, need legal assistance in this matter and are unable to afford legal representation.

DECLARATION IN SUPPORT OF EQUUS COMPLAINT- 1

## DECLARATION IN SUPPORT OF EQUUS COMPLAINT-2

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