

Exhibit I

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

RICARDO HARRIS, *et al.*,
Plaintiffs, v.
**GEORGIA DEPARTMENT OF
CORRECTIONS, *et al.*,**
Defendants.

Civil Action No. 5:18-cv-365-TES

Declaration of Jorae Smith

1. This paper describes things that have happened to me personally. Everything in this paper happened to me. I promise that everything written here is true and correct. In some places, I say that I believe something is true. That means that I believe that fact is true, but I cannot promise that it is true. I know that I might be called as a witness in this case, and that I might be asked to explain these facts in person. If this happens, I will say the same things that are written in this paper.

2. My name is Jorae Smith. I am in prison at Baldwin State Prison. Before Baldwin State, I was in other prisons: Central State Prison, Georgia Classification Prison in Jackson, Coastal State Prison, Georgia State Prison, Valdosta State Prison, Wilcox State Prison, and Augusta State Medical Prison. I have been in GDC since 2016.

3. I am deaf. I lost my hearing due to an infection at five years old. I am not fluent in written English. My language is American Sign Language (ASL). I went to a mainstream public school (not a deaf school) with a sign language interpreter. Reading and writing English was always really hard for me. When I first started school, I didn't know what sign language was, but I started to pick some signs up from other deaf kids in the school.

4. When I got to Baldwin State Prison in 2024, I had to fill out a grievance to let the

prison staff know that I am deaf. Even though it was obvious that I couldn't hear or understand anything the staff was saying, they didn't do anything to help me until I filled out a grievance.

5. Being in Baldwin today feels a lot like how it felt in the Georgia Classification Prison way back in 2016. I had no communication access then and I have no access now. Hardly any of the staff here bother to communicate with me in a way that I can understand. It makes me very frustrated and depressed. It was really difficult when I knew nothing about my rights. Now I know about my rights, but GDC still isn't doing what it should do.

6. I miss a lot in prison because GDC doesn't help me with my hearing disability. It is unsafe to be in prison because GDC doesn't give me what I need. Baldwin State Prison is a dangerous place to begin with. If you add in being deaf, it is even more dangerous because I don't get all the context that hearing people do.

Announcements and Notifications

7. I miss announcements and notifications because I don't hear them and no one tells me about them.

8. On August 25, 2026, I was moved to M3 dorm at Baldwin. It is a large room with bunkbeds holding 55 other inmates. I do not know why I was moved there, but it is much worse than where I was before, the K4 dorm which had the I Am Community program.

9. I have a seizure disorder that requires that I take the medication Keppra two times every day. I know that if I don't take my Keppra, I can get more frequent and severe seizures. This risk of severe seizures scares me.

10. For a long time, I was allowed to keep my Keppra with me so that I could take it when I need it. Being allowed to keep your medicines like this is called KOP, which I believe means "keep on person."

11. In 2025, I was told I could not keep Keppra KOP anymore. So now I need to get a dose from prison staff twice every day.

12. But, in the M3 dorm I'm in now, the staff just announces pill call with their voice and say "pill call". That's the only way I know that it is time for pill call. Because I'm deaf, I can't hear that announcement. If I don't respond, they move on and I miss my medication. I know I can have seizures if I miss this medication.

13. I have missed this medication three times in the last month. Each time I missed the medication, I had a seizure.

14. On September 21, 2026, I missed morning pill call for my Keppra. Later that morning, I had a seizure. The seizure happened on my bed and other inmates tried to flag down an officer. Thankfully the staff got medical attention before anything too bad happened.

15. On the afternoon of September 23, after missing my morning and afternoon doses of Keppra, I had another seizure on my bed. This time, other inmates in M3 couldn't find any staff at all. An inmate had to use a wall phone to call a family member after not being able to find staff. The family member called the prison and got staff to come down to check on me.

16. On September 26, I missed two doses of Keppra in a row over the weekend and I had another seizure in my bed. I had white foam coming out of my mouth. Again, the other inmates couldn't find any staff at all and had to call family members from a wall phone to get the staff to come.

17. They took me to the medical unit for all three of those seizures, but they still won't allow me to keep my Keppra KOP. But the staff doesn't do anything to make sure that I know it's time for pill call.

18. When I got to medical after each of these seizures, I never had Video Relay

Interpretation (VRI). I was never able to explain to the doctors what happened or have the doctors explain to me what happened.

19. I last filed a grievance on August 3, 2026 about VRI access, including in medical. On September 2, 2026, I got a response which said that I had failed to follow the procedure for filing a grievance. I feel like it is impossible to solve my problems through the grievance process. All of the process has to be done in English, and English is not my language. ASL is my language.

20. In the M dorm, officers don't tell me when pill call is because they expect me to learn about pill call by myself. An officer told me "if you miss your pills, why are you in prison anyway?" It feels like he's blaming me for missing pill call and saying that I need to watch out for myself. But I can't do that the same way that hearing people can. It feels that everyone is responsible for themselves in prison, and the officers don't have any responsibility to help me get information.

21. I feel like I have to do everything for myself. I have to stay up all the time on high alert trying so I don't miss pill call. Otherwise, I'll miss my medication. I try to sleep a lot because I don't have anything to do—there's no work, no activities, and no way to contact my family.

22. I am frustrated when I miss these announcements. All the hearing inmates can hear these announcements from the staff, but where do I get this information? It is not fair.

23. Before I was moved to M3 dorm, I was in K4 dorm. When I was there, an officer would come in my room and alert me to when it was time to get my medication. So I know it is possible that staff can alert me about when it is time to get my medication.

Effective Communication in Medical and Mental Health Encounters

24. In the beginning of August 2026, I was attacked by a 19-year-old inmate who

wanted to steal my property. He came into my room, he robbed me, punched me in the face, and then he ran out into the hallway. I followed him out of the room, but I never hit him. He picked up a broom and hit me again across the head with the broom handle. I immediately fell to the ground. The impact to my head caused me to have a seizure for two hours.

25. The next thing I remember is waking up in the hospital bed handcuffed. I couldn't sign at all and couldn't ask for VRI. The officer didn't tell the hospital staff that I was deaf. I spent the night there.

26. The next morning, they took me back to Baldwin. They took me to medical first. They just checked my blood pressure and they didn't do anything else. They didn't provide any VRI. I didn't have any opportunity to ask questions or find out what happened to me. If I was hearing, I would have asked the nurse if I got a concussion from the head injury and if there was anything I should be worried about.

27. In August, there was a follow up blood draw, but, again, there wasn't any VRI. On Friday September 25, I had another blood draw, again without VRI.

28. I am supposed to get results from the blood draw, but I haven't yet. I had a medical appointment on Tuesday, September 29 to find out about my results. I went to medical that day, but there was not any VRI and they didn't tell me any of the results from my blood draw. I had to have my weight and blood pressure done. I went to see a doctor, but there was no VRI. She talked, I did my best to understand, but I didn't really understand a lot of what she said. I asked for VRI and the doctor said that her supervisor needed to get VRI from the warden or the deputy warden. I tried to lip read. The appointment lasted maybe 10 minutes. I think she said that my blood pressure is normal, but they didn't tell me what the numbers are. I am assuming that she was saying everything else was normal, but I couldn't really understand. I asked her about my head, but I

couldn't really tell what I was supposed to do next or if I needed to follow up with a specialist when I get out.

29. If I had VRI, the appointment would have been different. I would have been trying to understand more about my symptoms. I would have asked if I had a concussion from the broomstick incident. I would be asking about my old appointments too, and the notes from those appointments when I didn't have VRI, so I can understand my medical history. I know that a CT scan they did in 2024 shows a traumatic brain injury. Did the broom stick to my head make my brain injury worse? What do I need to do to be sure my brain is okay?

30. I know that I have never had VRI in a medical appointment at Baldwin. So I don't have a lot of hope that my questions will be answered.

31. The time where I was hit with a broom stick also injured my arm. My arm felt weird like it torqued. I got an x-ray in medical, but I couldn't ask any questions or understand the instructions because I did not have VRI.

32. I have honestly given up on going to medical and meeting with doctors because I know that they won't understand me and I won't understand them. It's pointless to go because I can't communicate with them. There's never VRI. They expect me to write back and forth with them. I can't just write down all the information they want from me. It takes too long. And I know they aren't writing everything down that they would tell me if I was hearing and they could talk to me.

33. I had surgery done across the front of my forehead. I want to know what's happening with my brain. When I try to do work, I'm getting "brain zaps." I have flashbacks and trauma from difficult moments in my life because I believe that I have PTSD. I get headaches, bad dreams, and lots of pressure in my head. They can happen anywhere.

34. My body temperature regulation is all over the place. I want to know more about that and what I should do. I don't know why it's going back and forth.

35. I am coming up for release at the end of November. Who should I see on the outside when I get out in November? I don't know what doctors I need to go to when I get out. How will I get my medications when I get out?

36. Not being able to communicate with medical staff is depressing and disappointing. There is no way to express yourself. So I just have to sit on it all. I'm not suicidal now, but I used to be in my first few years here because I felt like I couldn't communicate with anyone—my family, staff, anybody—and I felt alone. Life in GDC felt completely overwhelming to me. It's been a long road.

37. My physical health is worse because I'm deaf and I don't have communication access in GDC. The only communication I have is on the weekends when my girlfriend comes to visit. If I was hearing, I could ask medical staff those questions and get them answered. If I was hearing, I'd be better prepared for my transition to the free world. I would know a lot more about my health.

38. My mental health counselor uses VRI, so I know it's possible that staff could use it at Baldwin. But that's it, otherwise I haven't seen any VRI at all at Baldwin, including at medical.

39. Ms. Ammons is my mental health counselor and she uses VRI. I have follow ups with her on some Fridays when I need to ask her something. But that is the only place where I have VRI access at Baldwin. My mental health is okay, I am just trying to get through. In the free world, I want to meet with a therapist who I can communicate with in ASL every 2 weeks to make my mental health better.

The M Dorm at Baldwin State Prison is Unsafe

40. I feel so unsafe in M dorm. There is a gang war going on here and the staff knows about it. The M dorm has been on lockdown for the last 3 weeks.

41. It is so bad in M dorm that I was on a temporary two week break from my plumbing work. My boss is a GDC staff person. He told me that I am on break from work because it's not safe for me to be walking around in M dorm. I agree. When I was in K4 dorm, I could do the work safely and my supervisor asked the warden to move me back to K4 but the warden refused. So now I'm just in bed all day in my dorm room. It's real frustrating.

42. Last week, they lifted lockdown for workers only. Now we are escorted by GDC staff to and from our work assignments.

43. M3 and the overall M dorm are very short staffed. They aren't doing count that much. At night, there are no staff around in the booth. If there is an emergency at night, hearing inmates can use a wall phone to make a phone call. But I can't use the wall phone because I am deaf and Baldwin has not set up a videophone that works for me.

44. There is a videophone kiosk in M3 but it doesn't work because when I try to make a call, it says "Sorry your request cannot be processed at this time. Please try again later." The warden tested it one morning and saw that message, and took a picture of it with her phone. She asked me which videophone I should be using, and I tried to explain to her the Purple videophone they had in Central State Prison. I'm not sure if she is going to do anything about it. The videophone in M3 still doesn't work. So there is no way for me to report an emergency.

45. Because there's so much gang violence in M dorm, I fear for my life here. I don't know why I am here.

I promise that everything in this paper is true and correct. I know that this is a serious paper. I know that I am signing this paper “under penalty of perjury.” This means that if I lie, I could get a new criminal charge against me for lying. I promise that I am telling the truth.

Dated: October 6, 2026

/s/Jorae Smith

Jorae Smith