

Exhibit H

**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 Ricardo Harris

1. I have personal knowledge of all of the facts in this declaration. I promise that everything written here is true or correct. I know that I might be called as a witness in this case to explain the facts in this declaration. If I am called as a witness, I will testify to the facts written here.

2. My name is Ricardo Harris. I am in Central State Prison. I was transferred here in 2018 from Augusta State Medical Prison. Before that I was at Georgia Diagnostic and Classification prison starting in August 2015.

3. I was born profoundly Deaf. I use American Sign Language (“ASL”) to communicate with others. I started learning ASL when I was 12 years old. I am not fluent in English. I cannot understand people unless they sign to me in ASL.

4. Most staff here know that I am Deaf because they have seen me here for many years. Sometimes, new staff start here and do not know that I am Deaf until they see my blue badge that says “Deaf.” I got this badge in 2018.

5. It is very hard to be Deaf here. I don’t think any of the staff here are trained on how to interact with Deaf people. They always ignore me when I ask for video remote interpreting (“VRI”). Most of the time, officers talk to me with only their voice even though they know I am

Deaf. They are very dismissive of me and the other Deaf people here. I miss a lot of important information and opportunities to get information just because I am Deaf. Nothing has changed since we started this lawsuit.

Announcements and Notifications

6. I often miss announcements and notifications because I do not hear them. No one from the prison makes sure I get the announcements. I think the officers do not care about their responsibilities.

7. The only way I know when there is an announcement or notification is when I see other incarcerated people start to leave the day room. When I see other incarcerated people moving around, I have to try to ask them what is going on to make sure I did not miss something. I still miss announcements because the staff and incarcerated people do not tell me about them.

8. For chow call, an officer walks by the window in the day room for E dorm and tells a hearing incarcerated person inside through the glass that it is chow time. Then that incarcerated person shouts out chow time to everyone in the dorm.

1. I usually miss lunch or dinner about three times a week. Usually I am in my room and no one tells me that chow time is happening. I feel left out. Sometimes when I miss chow call, I try to tell the officer that I missed it because I was Deaf. They always refuse to let me go in and eat. Sometimes I see the officers give hearing incarcerated people special treatment and let them go to chow whenever they want.

9. I miss breakfast every day because I can't hear the announcement and no one tells me. This impacts my ability to get enough nutrition and stay healthy. If the announcements were accessible, I would eat breakfast every day.

10. I always miss the announcements for yard call. They usually happen three times a week in the morning. Yard call is the only chance we get to be outside in the fresh air. I sit in my room every day and no one tells me when I can go. Prison staff think that I do not want to go outside. But I do want to go out. I have not been able to do any rec activities outside in years. This is terrible for my mental health. It is very depressing to be inside these four walls all the time and only go outside for chow and for sick call one or two times a year.

11. When the warden comes in for inspection, I always see her talking to the other people. I don't know if she's making announcements or sharing important information.

12. Sick call and other kinds of call outs work through a slip system. At night, an officer drops off slips of papers on the table in the day room. These slips have people's names, times, and the reason for the call out. That's how we know if we have a call out to go to the next day.

Effective Communication in Medical Encounters

13. The last time I received information about my health in a way I could understand was in summer 2024. A nurse told me through VRI that I had high cholesterol. She gave me a month's supply of medication. I kept the medication with me and took it for the next month. It ran out and they didn't give me any more. After that, I did not get any more information about my high cholesterol for the rest of 2024, all of 2025, and 2026 so far. I did not get any medical call outs to talk about my health in all that time.

14. In April 2026, I started feeling some tingling in my legs on and off about every three days. I was worried that it could be related to my high cholesterol or nerve damage. I did not know for sure. So I filled out a sick call slip to get blood work to figure out what was going on. When I went for my blood draw, there was no VRI. I waited three weeks for my results and I got no information. So in May, I filled out another sick call slip to get a blood draw again. I thought if

I did it again, someone would tell me what was going on with my health. I was wrong.

15. I went back for my second blood draw in May 2026. It happened very fast again. I felt like the goal was to rush me through the process. There was no time or way for me to communicate with the nurses about my health. There was no VRI again. If there was VRI, I would have asked the nurse about my April results. After doing my blood work two times without any results, I gave up asking for blood work. I did not want to keep getting blood tests if the prison medical staff won't tell me what is happening with my health.

16. Then on October 1, 2026, I got another blood draw. I did not ask for it. I don't know why I got it. There was no VRI again. I could not ask the nurse about my April and May results. I still don't have any results or information from my three blood draws.

17. I want to stay healthy, and I am very worried about my health. I cannot get any information about my medical care or my health on my own because I am Deaf and incarcerated in GDC. My deaf girlfriend has contacted GDC about my health many times, but GDC never responds.

18. Because of my experiences here, I do not trust GDC staff. I always see other hearing incarcerated people talk with Warden Brown when she walks through the prison. I have seen hearing incarcerated people complain to the warden or the deputy warden about their health issues. After they do that, I see the warden or the deputy warden use their radio to call medical. And then the hearing person gets to go to medical. Hearing incarcerated people can fix their health quickly just because they are hearing and can communicate.

19. But I can't do that because I can't communicate. I want to be able to talk to the warden or the deputy warden about my health too, but they never use VRI. If I could talk to them, I would ask them to ask the nurse about my blood tests and what is going on with my health.

Warden Brown knows I am deaf because I show her my deaf badge. I have waved at her so she will look at me, but she just looks at me and leaves. This has happened more than a few times. Every time it happens to me, it makes me feel powerless. But I am not surprised because I have been in prison for a long time and nothing has changed. No one ever pays attention to what I need.

20. Hearing incarcerated people can talk to the nurses or staff about their health issues. I can't do that. So I have no idea what I need to do to take care of my health. I am worried that when I am released, a doctor will tell me that I have health conditions that I did not know about. I also do not know how I will explain my health history to a doctor, because I do not know what has happened with my health while I have been in prison. I am worried that my health has gotten worse while I have been here, and that I may live a shorter life because of being here.

21. I feel like an animal in a zoo here. Staff here mostly ignore me or laugh at me, like I am not a person.

22. I live in E dorm, and the guard booth there is always empty. This means that people from other dorms can come in whenever they want. One day, someone came into E dorm from K dorm and everyone felt unsafe. I am scared of people from K and J dorms because they are more violent. People from other dorms have stolen our stuff in E dorm.

23. I feel unsafe here because I am Deaf. Staff still use their voice with me even though they know I am Deaf. They do not try to provide accessible information to me. All the problems I talk about here happen because I am Deaf. I feel very discouraged. I do not know what I can do to make sure that Deaf people in prison here get equal treatment like hearing incarcerated people.

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 5, 2026

/s/Ricardo Harris

Ricardo Harris