

**Exhibit B – Declaration of Arthur Johnson**



based upon scores from IQ tests administered at age 8 (score of 70) and age 14 (score of 63).

4. On December 22, 1979, I was removed from the general prison population and placed in solitary confinement at SCI Pittsburgh for allegedly being involved in an escape attempt. A few hours after being placed in solitary confinement, I was shipped to SCI Huntingdon. I remain in solitary confinement to this day, more than 36 years later. I am currently held at SCI Frackville.
5. I was held in solitary confinement at SCI Huntingdon from December 22, 1979 until sometime in 1985, when I was transferred back to SCI Pittsburgh.
6. I was held in solitary confinement at SCI Pittsburgh from 1985 until November 1989.
7. In November 1989, I was transferred to the custody of the Federal Bureau of Prisons (BOP). While I was in BOP custody, I spent 3-4 weeks in the general population.
8. In April 1990, I was transferred back to DOC custody at SCI Graterford, and was immediately returned to solitary confinement. I remained in solitary confinement at SCI Graterford until 1995.

9. In 1995, I was transferred to SCI Greene and again placed in solitary confinement. Between 1995 and 2004, I was held in solitary confinement at SCI Greene.
10. In May 2004, I was transferred to SCI Rockview. One month later, in June 2004, I was transferred to SCI Smithfield, where I was held until January 2005. I was held in solitary confinement at SCI Rockview and SCI Smithfield during the entire time I was at those prisons.
11. In January 2005, I was transferred to SCI Forest, where I remained in solitary confinement until November 2009, when I was transferred to SCI Huntingdon, where I remained for approximately 53 days, still being held in solitary confinement.
12. In January 2010, I was transferred back to SCI Rockview, where I was held until January 2013. I remained in solitary confinement this entire time.
13. In January 2013, I was transferred to SCI Frackville and continued in solitary confinement. I remain in solitary confinement at SCI Frackville at the present time.
14. All told, as of the date of this Complaint, I have spent more than 36 years in solitary confinement. This is more than half of my 63-year life and virtually the entirety of my time in prison.
15. During my 36 years in solitary confinement, I have spent 23 or 24 hours per day alone in my cell. I am not permitted to interact with other people

beyond short, necessary interactions with guards, and I am not exposed to anything going on in the outside world.

16. During my over 36 years in solitary confinement, my cell has been about 7 feet by 12 feet, smaller than many cages used to hold animals at zoos.
17. While I have been in solitary confinement, my cell has been lighted 24-hours per day, with no break during day or night.
18. For all of the 36 years that I have been in solitary confinement, I have been allowed at most one hour of time outside, five days a week, in a fenced-in exercise cage that is slightly larger than my cell, and I have been allowed this time only if weather conditions are acceptable, as determined by prison staff.
19. During my solitary confinement period, I have never been allowed to be in the exercise cage with another person.
20. For the past 36 years of solitary confinement, I have not had access to any exercise or recreational equipment.
21. For the past 36 years of solitary confinement, I have been forced to eat all of my meals alone in my cell.
22. For the past 36 years of solitary confinement, the Pennsylvania DOC has not allowed me to work, take classes, or participate in any activities within the prison.

23. Each time I leave my cell I am forced to undergo a mandatory strip-search. This includes every time I go to the exercise cage and to any medical appointment. To the best of my recollection, this strip-search policy has been in effect since sometime in the 1980s.
24. For all of my time in solitary confinement, I have been prohibited from having any visits with friends or loved ones that involve any physical contact, such as a handshake or a hug. All visits have been through a partition.
25. Save for the few months that I was in BOP custody, beyond necessary contact with prison staff, I have not touched another human since 1979.
26. Since my transfer to SCI Greene in 1995, every cell I have been in has had a solid steel door with narrow windows, which permits at most a highly constricted view onto the cell-block.
27. The solid steel door prevents prisoners from speaking to one another on the cell-block, increasing the isolation of prisoners in solitary confinement.
28. Prisoners in solitary confinement are prohibited from communicating with other inmates. Inmates can only hear each other in the solitary confinement unit when we yell, which is forbidden. If we violate this rule, we can be given a misconduct and punished with further time in solitary confinement.
29. During my time at SCI Greene between 1995 and 2004, I was told on multiple occasions by then-Superintendent Ben Varner that I would never

be released from solitary confinement. This has caused me to believe that my solitary confinement is permanent, continuing until I die.

30. As my time in solitary confinement grew longer, I began experiencing increasing feelings of anxiety and frustration, loneliness, difficulty concentrating, memory loss, and depression.
31. My heightened anxiety, concentration and memory problems, loneliness, and depression have gotten progressively worse each year.
32. I experience ongoing and increasing feelings of depression as my period in solitary confinement continues; life in solitary confinement causes me to feel hopeless about my future.
33. The depression I experience makes it hard for me to perform or enjoy basic activities and tasks such as concentrating, sleeping, exercising, getting out of bed, reading, and writing.
34. I have had increasing difficulty sleeping. I wake up frequently throughout the night and have difficulty getting back to sleep.
35. The 36 years that the Pennsylvania DOC has kept me from human contact and interaction has caused me to not feel emotions like I once did. I can no longer understand the feelings of others. I feel flat and depressed.
36. I have increased difficulty concentrating; I have difficulty sustaining thought or focusing on a subject for more than a few minutes. This problem has gotten worse each year as my solitary confinement has continued.

37. When reading, I no longer have the ability to concentrate on what I am reading. When writing, I must write increasingly shorter letters to family and friends, as I can no longer concentrate long enough to write letters.
38. I have suffered severe damage to my short-term memory. I struggle to remember acts performed minutes or hours earlier.
39. I fear I may never recover normal capacity for emotion or caring feelings for others; I feel distant from other people.
40. There are often times when I go days without speaking to another person.
41. My meetings with mental health staff at SCI Frackville and the other DOC prisons have almost always been little more than short, repetitive interviews at my cell door. When I have met with mental health staff outside of my cell, the meetings have never been detailed, but have only asked me general questions. The staff do not seem to know much about me, and they do not ask.
42. Prison officials have told me that I will remain in solitary confinement based on my past disciplinary record in prison, referring only to allegations and incidents that are more than 25 years old. Prison officials' references to my disciplinary record are always vague and do not explain how these very old incidents justify continuing my solitary confinement today.
43. In June 2015, then-Deputy Miller told me at a PRC hearing that he did not think I could make it in the general population because I have been in

solitary confinement too long. This statement shows the hopeless nature of my situation; prison officials say I have been held in solitary confinement for so long that I now must be held there permanently.

44. I have not been accused of any serious disciplinary infraction in more than 25 years.

45. Since returning from the federal BOP in 1990, I have had three disciplinary infractions.

46. The most recent disciplinary infraction, which happened in 2013, occurred when I was given a prescribed multivitamin. I decided not to take the vitamin until I ate because taking the vitamin on an empty stomach had caused me stomach upset in the past. I forgot that I had the multivitamin, and it was determined to be contraband when I had it in my cell.

47. Prior to that infraction, in 1999, I received a disciplinary infraction at SCI Greene for covering a vent in my cell with a blanket because I was cold. I also received a write up in the 1990s for possessing a rolled-up magazine, which was deemed a weapon.

48. Other than these three infractions, I have not had any disciplinary infractions since I returned from the BOP in 1990.

49. In the past, my DOC records stated that I said that I did not believe that anyone should be held in prison, and that I would escape if I had the chance. This was not an accurate statement. I never did and still do not

have those beliefs, and I will only challenge my conviction and sentence through use of the courts.

51. I have no intentions of attempting to escape if I am returned to general population.

52. I intend to continue abiding by all DOC rules and regulations and am committed to participating in whatever programming is offered in order to re-enter the general prison population.

  
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Arthur Johnson

Dated: April 26, 2016, Frackville, PA.