

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

P.G.,

Plaintiff,

Case No.

v.

JEFFERSON COUNTY, NEW YORK, et al.,

Defendants.

DECLARATION OF [REDACTED]

Pursuant to 28 U.S.C. § 1746, I, [REDACTED], declare as follows:

1. My name is [REDACTED]. [REDACTED] is my boyfriend. We have been together for over eight years, and live together in Watertown, New York, in a house we recently bought together. I work as a patient access registrar at the Samaritan Medical Center.

2. I have known [REDACTED] (or [REDACTED], as I call him) for fourteen years, and we have been in a relationship for more than eight years. [REDACTED] has been fighting his opioid addiction the whole time we have been together, but we have always been committed to each other. I can't imagine my life without [REDACTED].

3. [REDACTED] is a wonderful and kind man. He's my number one support system. He's always encouraging me to be positive and to not be a "hamster"—his way of saying I shouldn't be afraid to take advantage of opportunities to better myself. I also know I can depend on him. When I had knee surgery and couldn't walk for several weeks, he would carry me around the house and take care of me. Another time, I was distraught because my cat was sick and we thought she might have a brain tumor. I wanted to stay by the cat's side and slept with the cat in the living room. During that time, [REDACTED] took care of everything around the house and helped me

with the cat. In fact, he will do anything to help anyone even if they don't ask him to. For example, he helps elderly people at the grocery store load their groceries. Helping is instinctual for him.

4. It is scary when someone you love is involved with drugs. You never know what damage the drugs might do to them and if they might overdose or even die.

5. [REDACTED] has struggled many times to get off drugs in the time we have been together. He has tried so many different kinds of treatments and programs to try and overcome his addiction.

6. [REDACTED] wasn't able to make much progress with staying off drugs until he joined the methadone treatment program. Before he started methadone treatment, he was in and out of jail and doing real harm to himself and to those who loved him. For a while, Suboxone gave him some help, but after some time it stopped being effective. I've known [REDACTED] long enough to be able to tell when he was close to relapsing. He's normally very calm and chill, but when the Suboxone stopped working for him you could tell that he was on edge and having cravings.

7. Methadone is different. Since [REDACTED] started the program at the Credo clinic I can tell he is a lot more free from the hold that the drugs used to have on him. When he's taking methadone he is much calmer from day to day, and he says he doesn't constantly think about using heroin. As [REDACTED] explains it, relapse can be like a reflex in that he turns to drugs out of instinct when there is stress in his life. But he says methadone takes away that instinct—his body does not react by craving drugs when he is stressed out.

8. [REDACTED] has made a lot of progress in his recovery with the combination of methadone treatment and therapy he is doing at Credo. He's been able to hold down a job and be more

responsible about spending the money he makes. We were able to buy a house and he bought a car. We couldn't have done any of this before his treatment gave him a feeling of security.

9. [REDACTED]'s relationship with his family has improved, too. He is better able to be there for them. For example, he helps his mother clean and do chores around the house. He also spends a lot of his time with my nephew. Every time I see my nephew he asks where Uncle [REDACTED] is. [REDACTED] loves being Uncle [REDACTED]!

10. But [REDACTED] needs more time in his current treatment program to reach stability and free himself from drugs in a way that will last. I'm terrified about what will happen to [REDACTED] if he's taken to the Jefferson County Jail and forced off his medication. Without his methadone doses, I'm worried that he will relapse and get very badly hurt, or even die.

11. I've seen what happens when [REDACTED] can't get his medication. About five years ago, [REDACTED] was taken off his medication in jail. He wasn't able to resist his cravings for drugs after getting released even though he tried and he went back to using. Not long after he was released, he was in the bathroom when I heard a crash. He had overdosed and fallen. I immediately called an ambulance, and they were able to save him. I feel lucky that I was home but it was terrifying. After you see that happen one time to someone you love, you don't want it to happen ever again.

12. Even if [REDACTED] doesn't overdose without methadone, he will go through withdrawal. It's also hard for me to watch him suffer through that. He tries to hide the symptoms from me because he doesn't want me to worry but it's obvious that the experience is extremely painful for him. I can see his muscles spasm, and his limbs jerk uncontrollably. He gets sick in his stomach. Withdrawal also takes a mental toll on him. He cries a lot because he says he feels depressed and anxious.

13. [REDACTED] has told me that he is so scared of being taken off methadone completely at the Jefferson County Jail that, for the past few months, he has chosen to stay at a much lower dosage than he is used to. The reduced dosage has been hard for him. He gets cravings and has had withdrawal symptoms. He also moves much more slowly than usual. During the pandemic, we've liked to get outside by going to the park and birdwatching, but since he's been on the lower dosage he takes so long to get ready that we almost never make it outside. He says he is enduring this because going from his regular dosage to total withdrawal at the jail would be too painful.

14. I have been with [REDACTED] for long enough and seen enough of his struggles against his addiction to know that for him, methadone treatment is the difference between staying on a path of recovery and relapse. Thanks to his treatment, he has not used any illicit drugs for more than six months. It has not been easy, but he has come so far.

15. I am truly worried that [REDACTED] will die if the jail doesn't let him continue to get his methadone medication. I'm afraid that when he comes home, he'll overdose and I'll lose him. Opioid addiction is a sickness that so many people are affected by and I don't understand why someone who is sick should be denied treatment just because they are in jail.

Dated: April 22, 2021
Watertown, NY

[REDACTED]