

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

P.G.,

Plaintiff,

Case No. 5:21-cv-388 (DNH/ML)

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]. I was born in 1985 in Newport, Rhode Island. I have spent most of my life in New York. I live in Watertown, New York with my girlfriend of eight years, [REDACTED], in a house we recently bought together. I work as a driver for a food delivery service.

2. I have struggled with opioid addiction for more than fifteen years. For me, the key to overcoming my addiction is being able to prevent withdrawal symptoms and quiet my cravings for drugs. I have tried just about everything to stop taking drugs over the years—including medication-based treatment, therapy and counseling, and quitting cold turkey. The only form of treatment that has been effective for me is methadone.

3. The non-medication programs I've tried did not help me control my craving for opiates. For example, in 2011, when I attended a 28-day inpatient rehab program that did not include medication, I was in withdrawal the whole time and relapsed as soon as I finished the program. Years later I was still in this cycle of treatment program followed by relapse. I relapsed after completing a three-month intensive therapy program in 2016 called "Shock" at the

Willard Drug Treatment Campus. I so badly wanted to turn my life around and hoped these programs could get me there, but without medication to help control my cravings, I wasn't able to stop going back to drugs.

4. Before methadone, I tried other medications for my opioid addiction but they did not work very well either. I was prescribed Suboxone (a combination of buprenorphine and naloxone) on and off for about ten years starting in 2006. At first, Suboxone was somewhat effective. It helped reduce my cravings for opiates, but did not totally eliminate them. For some periods, I was able to get off heroin, but most of the time I was still using it three or four times a week. After a while, Suboxone stopped working for me entirely. Even though I was taking it at my prescribed dosage, it no longer controlled my cravings or my withdrawal symptoms—including body pains, insomnia, anxiety, body aches, and what I think was a form of depression.

5. I was prescribed Vivitrol (a brand name for naltrexone) for a few months in 2016 and again briefly in 2017. The Vivitrol did not reduce my cravings or withdrawal symptoms at all. Instead, it had a “white knuckle” effect—because the cravings were still there, I was constantly fighting the urge to use drugs, and it was hard to think about anything else. I continued using drugs when I was taking Vivitrol.

6. By contrast, methadone dramatically reduces the cravings and the withdrawal symptoms that made it so hard for me to stay off drugs. I first started methadone treatment in 2018 and that was the first time I felt normal without needing to use illegal drugs. I've now been going to a local clinic for methadone treatment, together with group therapy and individual counseling, for two years. That treatment has helped me manage my addiction and make progress in my recovery in a way that just wasn't possible before. I haven't used any illegal

drugs for six months, and with the stability methadone has brought to my life, I have been able to keep a steady job and buy a home with [REDACTED].

7. I plan to maintain my methadone treatment for the long-term. I believe this treatment will help me continue building my life free from the influence of drugs.

8. I am terrified of being forced off my methadone treatment at the Jefferson County Jail. I know from experience that taking me off my prescribed methadone, or reducing the dosage, would not only cause excruciatingly painful withdrawal symptoms, but also increase the risk that I will relapse, overdose, and even die.

9. Withdrawal is sheer torture. When I've gone through it in the past, everything in my body aches, and it feels like my skin is crawling. I have nausea, vomiting, diarrhea, and chills. I get extremely anxious and jittery. I often cannot get out of bed but also cannot fall asleep. Sometimes I've gone whole weeks without being able to sleep for more than an hour or two a night. The withdrawal is so hard to bear and the cravings are so all-consuming that I relapse. My cravings for opiates become so strong that it's hard to think rationally and to control the amount of drugs I'm using. That's when I've had the biggest risk of overdosing.

10. In fact, I overdosed after getting released from jail in Syracuse in 2016. Against my will, the jail removed me from the Suboxone treatment I had been receiving. I went through severe withdrawal and relapsed soon after leaving the jail. When I overdosed, [REDACTED] heard me fall and hit the floor. I woke up surrounded by police officers who were reviving me with Narcan. If [REDACTED] hadn't called 911 right away, I might not have survived. I was lucky that [REDACTED] was at home when I overdosed, but I'm embarrassed that she saw me like that and that I needed so much help. Experiences like this are why I'm scared the Jefferson County Jail's policy against methadone treatment would jeopardize my life and my recovery.

11. I first used opiates in 2005. I was 19 years old and studying engineering at Jefferson Community College. I had some friends who were using OxyContin and they gave me some to try. Before long, I was using OxyContin every day. I realized I had become addicted to opiates. I wasn't the first person in my family to get caught up in addiction—several people on my dad's side of the family have had substance use disorder.

12. Around 2008 or 2009, the price of OxyContin pills went up and I couldn't afford them anymore. I began using heroin because I had become addicted to opiates and because it was cheaper. That was when things spiraled out of control. I dropped out of college and my parents kicked me out of the house.

13. In late 2011, I was arrested for two misdemeanors related to my addiction—petit larceny and criminal possession of a controlled substance in the 7th degree—and served six months in jail at the Onondaga County Justice Center in Syracuse. I went through weeks of extremely agonizing withdrawal in jail because I was not given any medication: my whole body ached, I had frequent fits of vomiting and diarrhea, and I had severe anxiety that led to many sleepless nights. Going through withdrawal in jail was even more painful than going through it at home because I couldn't talk to my family or my counselor for support and being in a claustrophobic cell made my anxiety worse.

14. The next few years, from 2013 to 2016, were some of the most difficult of my life. I was using heroin more than I had before and stealing to support my habit. As a result, I was in and out of jail for charges like possession and petit larceny. I regret all the things I did during this period. They were wrong and I am sorry that I behaved that way.

15. I was desperate to get off heroin, but by this point every treatment option I had tried had failed, including medications like Suboxone and Vivitrol. Whatever treatment I was receiving, I continued to have cravings for drugs and withdrawal symptoms and couldn't break free.

16. Things changed in 2018 when I enrolled in a new treatment program using methadone, a different medication for treating opioid use disorder, at Conifer Park clinic in Liverpool. The methadone made a big difference. The clinic started me at a low dosage (30 mg per day) and gradually increased it to find the right dosage to make me feel stable. By the time the dosage was 90 mg per day, my cravings were much weaker so I was using around one-tenth as much heroin as I was before taking methadone. Of course, my goal was to get off heroin completely and I wasn't where I wanted to be yet, but I was doing so much better than before. I realized that, unlike all the other treatments I had tried, methadone was helping me a lot.

17. Although the methadone treatment was helping a lot, I had to stop going to the Conifer Park clinic after about two months. The clinic was 60 miles from where I lived in Watertown, so I had to drive more than two hours each day, seven days a week, to get my methadone doses. There was often a long line to get the dose, and I also had to attend group and individual therapy sessions at the clinic as well as appointments with doctors and nurses. Added together, the clinic visits were taking up more than three hours most days, and sometimes as much as seven hours. I was exhausted from making the journey every day and struggling to maintain enough hours in my job as a waiter because I could only take shifts that started in the late afternoon.

18. In late 2018, a methadone clinic opened at the Credo Community Center in Watertown, near where I live. I signed up and, after being on a waitlist for a few weeks, was

finally able to resume methadone treatment. I started on a dosage of 30 mg per day. For the first couple of months, the dosage was not enough to control my addiction and I was still using heroin. That led to my arrest in March 2020 for petit larceny. As the clinic gradually increased my dosage over several months to 140 mg, I began feeling better and better.

19. Things got much better since I got to a dosage of 140 mg. At that dosage, I was mostly able to stop using drugs. Before the COVID-19 pandemic hit, I stayed off drugs completely for several months thanks to the methadone treatment and the support and counseling the Credo clinic provided. I had a positive routine and support network from my daily visits to the clinic. The nursing staff would check in with me daily about my dosage and my counselor and I met weekly to discuss my recovery goals and stressors in my life. Unfortunately, many of the services I had received through Credo weren't available during the pandemic, so for a while I could not participate in therapy or counseling. Without my routine and support network and with the new added stress and isolation caused by the pandemic, staying off drugs was more of a struggle. I used drugs on a few occasions, but much less frequently than in the past. In fact, I've been able to stay off drugs completely for the last six months. So although the road hasn't been completely smooth, overall I've been really happy with the progress I've made in the last year. It's been a long time since I've felt this hopeful about my recovery.

20. As a result of my methadone treatment, I've been holding down a steady job as a food delivery driver, bought a house together with my girlfriend [REDACTED], and got a loan and started making payments for the car I use to do deliveries. Once in a while, [REDACTED] and I go birdwatching at the park. These may sound like pretty unremarkable things, but they mean a lot to me after all the struggles I've been through.

21. Although I have done well when receiving methadone treatment, there have been three interruptions in my treatment since I began receiving methadone in 2018. All of those interruptions have been extremely painful.

22. The first interruption was when I stopped going to the Conifer Park clinic because it was hours from my house and going to the appointments every day made it hard for me to keep a job. I went through withdrawal and almost immediately went back to using drugs like I had before doing the treatment.

23. The second interruption was when I was held for about six weeks at the Jefferson County Jail around March and April 2019, not long after I started my methadone treatment at the Credo clinic. I told the correctional officer who booked me into the jail and the nurse who did my medical exam that I was taking prescribed methadone for my opioid use disorder and needed to continue the treatment. They both told me the jail does not provide methadone. They did not give me any other form of medication, so I suffered three weeks of awful withdrawal symptoms, including pain throughout my body, nausea, vomiting, diarrhea, anxiety, and sleeplessness.

24. The third interruption was during the two months I was at the Onondaga County Justice Center between October and December 2020. Although the jail provides methadone, I did not receive my dose for four or five days because of a mix-up with paperwork. Once the paperwork was processed, the jail had to restart my dosage at 30 mg because of the gap in my treatment. I went through withdrawal during the gap, and even once I was given 30 mg doses of methadone, I experienced strong opioid cravings and withdrawal symptoms.

25. Because I have been charged with violating the terms of my probation for the arrest that led to my incarceration in Onondaga County in October 2020, I could be taken to the Jefferson County Jail again any day now. After I was released from the jail in Onondaga

County, my probation officer told me that I would be put in jail for my probation violation charge.

26. The possibility of losing my methadone treatment has been all I can think about ever since I realized that I could end up back in the Jefferson County Jail. I am so worried about being taken off my methadone at the jail that after my release from the Onondaga County Justice Center, I decided to stay at a low dosage instead of returning to the 140 mg dosage that had worked well for me before. I continued taking 30 mg per day for three months but recently had to increase the dosage to 60 mg because the cravings and withdrawal symptoms were becoming too hard to bear. I still have cravings at 60 mg, so I may have to increase my dosage again despite my fear of being removed from methadone at a higher dosage. Even so, the prospect of going from a 140 mg dosage to zero at the Jefferson County Jail is so terrifying that I would rather survive on the reduced dosage for now. I've even tried to force myself to skip doses some days, even though I start to experience withdrawal when I do, because I am really, really scared of going from my current dosage to zero.

27. My addiction has devastated the last fifteen years of my life. But more than that, it has caused me to hurt and disappoint the people I love over and over again. It's been really hard for [REDACTED] to watch me go through cycles of relapse and spend time in jail while she has to take care of everything by herself. Seeing my struggles has also been very stressful for my parents. They've spent many hours pleading with me to find a way to stop using drugs.

28. Because of my addiction, I also did a lot of things that I knew were wrong even as I was doing them. I have shoplifted and stolen many times to pay for drugs. I am not proud of the things I used to do, and I know I'll never live it down, but I want to put that behind me so I can focus on making amends to myself, my friends and family, and the community.



29. I have never felt more hopeful for the future than during the last year and a half, since I've been able to continue my methadone treatment at the Credo Clinic. I am beginning to believe I can have a permanent recovery and get on the right path for good.

30. Because I am in recovery, I now have a good relationship with my family. I have dinner with my dad regularly. I'm also close with my mom and speak to her on the phone all the time. We took a lot of precautions this past year because of the pandemic but now that she is vaccinated, I have been able to visit her again. I hang out with [REDACTED]'s nephew every week. He treats me like his best friend, and I've been teaching him how to ride the dirt bike he got for his birthday.

31. Most of all, [REDACTED] has stood by me through all of my ups and downs over the last eight years, and I want to repay her by becoming a stable, reliable partner. She's been instrumental in my working towards recovery because she helps keep me accountable for doing the things I need to do. For example, she encourages me to make appointments for treatment and makes sure I follow through. And even when I've relapsed in the past, she hasn't been mean or judgmental, but she makes clear that she is not happy about it and that I need to take action to change. She has never stopped supporting me. Now that I am moving in a good direction with my recovery, I want to be able to do all the normal things with her that we've missed out on because of my addiction—things like taking her out to dinner and going on vacations.

32. Methadone treatment has made all of this possible. I don't know if I would be able to handle the pain of being taken off it. I've already been through forced withdrawal in the Jefferson County Jail once, and I've overdosed after having my medication cut off in jail. So I know how brutal the experience is, and how high the stakes are for my life. All I want is to put my drug addiction behind me and continue building a life for myself. I know from my many

years of undergoing different treatments that methadone treatment is my only realistic hope of doing that.

Dated: April 25, 2021  
Watertown, NY

