

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

M.C. and T.G., on behalf of themselves and all
similarly situated individuals,

Plaintiff,

v.

JEFFERSON COUNTY, NEW YORK, et al.,

Defendants.

Case No. 6:22-cv-190 (DNH/ATB)

DECLARATION OF M. [REDACTED] C. [REDACTED]

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

1. My name is [REDACTED]. I am 29 years old, and I have spent my whole life in New York. I live in Croghan, New York with my girlfriend of four years.

2. I am diagnosed with severe opioid use disorder (“OUD”) and have struggled with opioid addiction since I was a teenager. My drug use started after I broke my leg and ankle in a four-wheeler accident when I was in my mid-teens. I was prescribed Percocet for my injuries and soon I didn’t feel right without it. Because I had become dependent, I bought pills on the street after my prescription ran out. That escalated into more serious opioid use and by the time I was 18 years old, I was addicted to heroin.

3. OUD has almost cost me my life. I’ve overdosed several times. On one of those occasions, I collapsed when I was on my way to visit my brother. I was very lucky that my girlfriend was with me and was able to revive me with Narcan. I had to be taken by ambulance to the hospital. Another time, I passed out at my brother’s house. I don’t remember what happened,

but my brother says I was unconscious for about ten minutes and turned deathly pale. I came to only after he tried everything to wake me up, including massaging my sternum for several minutes.

4. Opioid addiction has also taken a heavy toll on my whole family. My oldest brother was in a really bad place with heroin until about five years ago, when he started treatment with methadone and was able to turn his life around. My father, who was my best friend, died from an overdose three years ago. Although we did not have a good relationship when I was growing up, we reconnected as adults and did everything together. We would go hunting and fishing and even lived together for more than two years. I was devastated by his death.

5. I've tried again and again to overcome my addiction. Over the years, I've gone to at least ten different rehabilitation programs, including inpatient programs. I've done all kinds of therapy and group counseling. But without medication to help control my opioid cravings, I would always end up relapsing.

6. I knew that I had to try something different if I wanted to put my drug use behind me. So, in around 2015, I began seeing a doctor in Watertown who prescribed me Suboxone. Although the Suboxone helped reduce my cravings more than any other rehabilitation program I had tried before, it did not allow me to stop using drugs completely, even when I was on a full dose of 16 mg per day. I stayed on the Suboxone treatment for about a year and half, but I was still using opioids on and off during that period.

7. In around May 2017, I switched to methadone to treat my OUD. My brother had started getting methadone treatment at the Credo Community Center in Watertown, and he told

me it helped him more than any other treatment he had tried. Because Suboxone had not worked well for me, I also made an appointment at Credo and the doctor there prescribed me methadone.

8. My brother was right: Methadone was a game changer for me. Once I was on a therapeutic dose, my cravings almost completely vanished. For the first time since I started using opioids, I felt like I was in control of my own mind and body. I wasn't thinking about drugs constantly, and instead had the energy and motivation to go out into the world and work on getting my life back on track. I started doing some landscaping jobs, which I loved because I enjoy working outside. To help support my methadone treatment, I also voluntarily went to Narcotics Anonymous meetings—including every day for more than two months at one point.

9. Methadone made such a difference in my life that about a month after I started taking it, my girlfriend also began getting treatment at Credo. We have been going to Credo together ever since and leaning on each other in our recovery.

10. But twice since I started receiving methadone, my treatment was disrupted by incarceration. Both times, the withdrawal I went through was awful beyond imagination—much, much worse than even withdrawing from heroin.

11. The first time was in early 2019, when I was at the Lewis County Jail for about two months for a probation violation. During those two months, my withdrawal was severe and agonizing. I had extreme body aches and bone aches, cold sweats, and restless legs. For the first few weeks, I couldn't sleep for more than an hour most days. I was so sick and disoriented that I had hallucinations and became paranoid that people were coming into my cell to hurt me.

12. The second time I was taken off my methadone treatment was in September 2019. I was at the Lewis County Jail for about five months. And again, the withdrawal was awful,

including the same extreme aches, sweats, restlessness, insomnia, and disorientation that I had suffered through before.

13. What made these experiences worse was that without methadone, my opioid cravings came back. They became stronger the longer I was without my medication. As a result, each time I was released I went back to using drugs.

14. Thankfully, for the past two years, I have been able to maintain consistent methadone treatment at Credo and stay away from opioid use. I am now on a therapeutic dosage of 185 mg per day, which has helped me control my cravings. I finally feel like I can live a normal life. I'm living with my girlfriend in our own apartment in Croghan, and we support each other in our treatment. Most important of all, I am a part of the lives of my kids. I have three young sons, and we do all sorts of fun things together. We go bowling and watch movies, and because they love being outdoors just like I do, we do a lot of swimming, hiking, and playing catch.

15. It has been a long and hard road for me to get to this point in my recovery from OUD. I'm so scared that my progress will be undone if the Jefferson County Jail ends my methadone treatment, and I am willing to serve as a class representative in this class action lawsuit seeking to ensure that other class members like me are provided with agonist medication for OUD in the jail's custody. The two times I was taken off methadone in jail before were the sickest I have ever been in my life. I am petrified to have to go through that again. Just as scary to me is the prospect of relapsing again without my medication. Having spent weeks shaking and screaming on the floor of my jail cell when I was taken off methadone before, I know how desperate withdrawal can make me to take drugs to stop the pain. And with all the fentanyl out

there now, any relapse could kill me. I cannot bear the thought of that because I want to be there for my girlfriend and watch my children grow up.

Executed on: February 28, 2022
Croghan, NY

