

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-00190-DNH-ATB

**DECLARATION OF DANIEL PISANIELLO, M.D.**

Pursuant to 28 U.S.C. § 1746, I, Daniel Pisaniello, declare as follows:

1. I am the Medical Director at the Credo Community Center for the Treatment of Addictions, located in Watertown, New York. I have held that position for five years.

2. I received my M.D. from Albany Medical College in 1986 and have practiced medicine for 35 years. I am board certified in both family medicine and addiction medicine. I have worked as an addiction specialist on a part-time basis for 30 years, and a full-time basis for the past five years.

3. As Medical Director, I oversee M█████ C█████ treatment at Credo. ██████ is diagnosed with opioid use disorder. I determined, after considering ██████ individual clinical profile and all available treatment options, that methadone is the necessary medication to treat his opioid use disorder.

4. ██████ is currently prescribed a daily methadone dose of 185 mg. That is a high dose reflecting the severity of his medical condition.

5. Involuntarily withdrawing ██████ from his methadone treatment is medically contraindicated. Because of his high dosage, ██████ would experience severe and extended

withdrawal symptoms if he is not allowed to continue taking his methadone medication daily. This severe withdrawal would likely set in within 24 to 48 hours of any interruption in his dosing. Discontinuing [REDACTED]'s treatment would also put him at greater risk of dangerous overdose and jeopardize his recovery from opioid use in the long term.

6. Therefore, it is very important that [REDACTED] be allowed to continue his daily methadone treatment without interruption during his incarceration.

7. If [REDACTED] is incarcerated at the Jefferson County Jail, the Credo Community Center is willing and ready to continue his treatment.

Daniel Pisaniello, M.D.  
Daniel Pisaniello, M.D.

Dated: 2/28/2022

Watertown, NY