

**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 R [REDACTED] G [REDACTED]**

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

1. My name is [REDACTED]. I am fifty-one years old, and I live in Watertown, New York. I was detained at Jefferson County Jail from December 21, 2021, to February 3, 2022. During those six weeks, I went through terribly painful withdrawal after the jail forced me to stop my prescribed treatment for opioid use disorder (“OUD”).

2. I have been living with OUD for more than three decades. My dependence on opioids began in 1989, when I was prescribed an opioid painkiller following a root canal operation. I became addicted to heroin shortly after this, snorting and injecting it.

3. Addiction runs in my family. I have three siblings who are living with opioid addiction.

4. Even though I overdosed in 2004, I could not stop using heroin. My opioid addiction was too powerful—it took over my life. It did not allow me to make rational decisions.

I found myself doing whatever I could to support my addiction, including shoplifting, because I became sick if I did not have heroin.

5. I have had experiences with non-medication treatment programs, but any success with those programs was extremely short-lived—I could not escape negative thoughts and intense opioid cravings.

6. I first received medication to treat my OUD in 2013, when I was prescribed Suboxone. The therapeutic dosage I was receiving before my most recent incarceration was 16mg per day. Receiving a therapeutic dosage of Suboxone has been effective at managing my addiction. It takes away those intense opioid cravings, regulates me, and helps me think positively. Suboxone makes me feel alive.

7. Suboxone helps me finish simple everyday tasks, keeping me focused and giving me the energy and motivation to get things done. Because of the stability Suboxone treatment has given me, I have been able to complete almost four semesters of an associate degree in chemical dependency at Jefferson Community College. I am motivated to finish this degree so that I can help support others who are battling addiction like I am. I returned to school after I was released from Jefferson County Jail and am now completing my final semester.

8. Although I have relapsed on several occasions since starting Suboxone treatment, those relapses have been brief and were the result of my Suboxone dosage not being high enough to fully suppress my opioid cravings. I stabilized and was able to stop using illicit opioids when my treatment provider increased my dosage.

9. I only experienced an extended relapse once since starting Suboxone treatment—a relapse that nearly cost me my life—immediately after a period in jail when my medication was cut off. From 2017 to 2018, my Suboxone treatment was stopped when I was in the custody of

Oneida County Jail for approximately one year. My resulting withdrawal symptoms and cravings for opioids were unbearable, and I relapsed almost immediately when I was released. Within a couple of days, I overdosed on heroin and almost died before being revived with Narcan.

10. I have been forced off my Suboxone treatment at Jefferson County Jail twice before my most recent incarceration, in 2015 and 2020. I was detained for about two to three months each time. And each time, the jail refused to allow me to continue my Suboxone treatment despite knowing that I had been actively receiving that treatment prior to my detention. The withdrawal I underwent each time the jail cut off my treatment was excruciating—both physically and mentally. I experienced bone aches, sleeplessness, and anxiety. I felt my skin crawl and was not able to eat or drink. I also suffered severe stomach cramps that caused me to constantly vomit, urinate, and defecate on myself. The withdrawals lasted for six to eight weeks.

11. Because of my horrible experiences at the jail previously, I tried to make sure the jail would not stop my treatment again this time. When I was taken into the Jefferson County Jail's custody on December 21, 2021, I brought my Suboxone prescription, notified jail staff of my OUD at intake, and requested continuation of my Suboxone treatment. But nurse LuAnne Beutel told me, "You're not going to get that here" because the jail does not provide Suboxone.

12. Every day for at least a week after my admission to the jail, I asked repeatedly for my Suboxone medication. But it made no difference. Correction officers told me, "I don't know why you're doing this," because the jail was not going to provide my medication. Officer Baker told me to "grow up" and "stop whining."

13. I also tried to file a grievance about getting my medication but that didn't go anywhere. I first requested a grievance form on December 23, but the jail staff did not give me a form until more than a week later. When I finally got the form, I filled it out in front of Sergeant

Larkin. I asked him whether grievances asking for Suboxone were ever granted, and he said no. Sergeant Dettmir informed me about a week later that the jail denied my grievance. Then, I appealed the denial of my grievance. When I gave my appeal to Sergeant Dettmir to send to Albany, he told me that it was pointless, because regardless of what the outcome of the appeal is in Albany, the jail would not give me Suboxone. I never got a decision on the appeal.

14. As a result of being denied Suboxone, I experienced withdrawal symptoms even worse than those I suffered the previous two times the Jefferson County Jail discontinued my Suboxone therapy. I had insomnia, dreams about drugs, chills, nausea, bone aches, and mood swings. Without my medication, I constantly battled intense opioid cravings. I was losing hope for the future and felt like my world was going to end. I was not given access to my medication at any point during my time at the jail. This experience took a big toll on me psychologically.

15. I had a hard time getting re-stabilized after my most recent detention and withdrawal at Jefferson County Jail. I am terrified of ending up in the same situation again. I want to build a better life for myself. For that to happen, I have to stay on my medication treatment. Suboxone puts things into perspective and helps me build this better life. The longer I am on Suboxone, the more I have to live for.

Executed on: February 28, 2022  
Watertown, NY

