

**Exhibit D**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

Karen Davidson,	)
Debbie Flitman,	)
Eugene Perry,	)
Sylvia Weber, and	)
American Civil Liberties Union	)
of Rhode Island, Inc.,	)
	)
Plaintiffs,	)
	)
vs.	) Civil Action No. 1:14-cv-00091-L-LDA
	)
	)
City of Cranston, Rhode Island	)
	)
Defendant.	)

**AFFIDAVIT OF CAITLIN O'CONNOR, DOC**

I Caitlin O'Connor hereby declare that the following is true to the best of my knowledge and belief:

**BACKGROUND**

1. I serve as Principal Research Technician for the R.I. Department of Corrections Planning & Research Unit. I have held this position since November 2010.
2. As a keeper of records I have forwarded documents and other information to Legal Counsel for the DOC pursuant to a subpoena request served upon the DOC

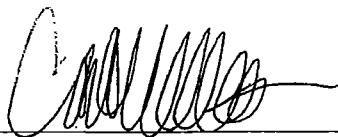
in February of 2015. These documents have been recorded in good faith in the ordinary course of business, not in preparation for this or any other litigation.

3. The Adult Correctional Institutions (ACI) first facility was constructed in 1878. Additional facilities were opened on the State grounds in 1978, 1981, 1982, 1992, 2010 and 2011. The ACI has always continuously existed at most of the same present locations, best described as the following list of addresses: Intake Service Center, 18 Slate Hill Road; Minimum Security, 16 Howard Ave.; Medium Security, 51 West Road; Maximum Security, 1375 Pontiac Ave.; High Security, 54 Power Road; Women Minimum Security, 7 Fleming Road; Women Maximum Security, 13 Fleming Road.

#### **CHARACTERISTICS OF POPULATION INCARCERATED AT THE ACI**

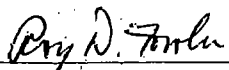

4. At any given time, approximately 37.4% of those incarcerated at the ACI have been convicted of felonies. Approximately 34.25% have been convicted of misdemeanors. Approximately 33.69% are being detained prior to trial.
5. Regarding the previously provided Excel spreadsheets containing the ACI population statistics files labeled "AT Stock 3-31-10", "Sent stock 3-31-10", "AT Releases CY10", and "Sent Releases CY10", the following caveats apply. Re-running historical files may not always produce the exact same information that was reported at the time. These files are run monthly, and then merged. Running them this many years after the fact there could be discrepancies due to a lag in record keeping/data input. However, I do not believe any discrepancies would be

significant. The addresses included in the first two worksheets listed above *were self-reported by the offender upon commitment*, with each row representing one offender. In the second two spreadsheets which contain release data, the releases are based on events, not people. In other words, an offender could be released, recommitted, and subsequently released again in the same time period. Each row indicates a release event. Again, the addresses included were also *self-reported by the offender upon commitment*. Note that an awaiting trial (AT) offender on the release sheet may have been "released" to a sentence and remained at the ACI, possibly causing an overlap between the two files.



Caitlin O'Connor

Signed and sworn to before me at Cranston on this 1<sup>st</sup> day of June, 2015.

   
Roy D. Fowler Notary Public

My Commission Expires February 15, 2016