

# EXHIBIT 15

**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 ERNEST MYERS, JR., DOC**

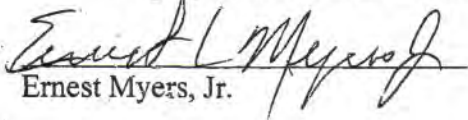
I Ernest Myers, Jr. hereby declare that the following information is true and correct to the best of my knowledge and belief:

**BACKGROUND**

1. I am the Supervisor of the Work Rehabilitation Program Unit (Work Release) of the Department of Corrections (DOC). I have served at the DOC for twenty-six years and have held a position in this Unit since 1989.

## WORK RELEASE AND FURLOUGHS

2. The Rhode Island Department of Corrections offers limited work release programs or furloughs for persons incarcerated at the ACI. Other than to attend one of the various courts or work release approved employment there are no opportunities for incarcerated persons to leave the grounds of the ACI (except for home confinement) that are not described here. Work Release, Work Details, Home Confinement and Furloughs are all limited and prescribed by state statutes and DOC policies. Home Confinement sentences are considered "incarceration" although the inmate is confined to his/her approved residence anywhere in the state.
3. Incarcerated persons who are classified to Minimum Security and approved for "work release" (not "work details") sign out of the facility at the beginning of their work day and sign back in at the end of such day. There are approximately fifteen to twenty-five inmates so approved and classified at any given time. Right now there are fifteen.
4. Incarcerated persons approved for the work release program either by court order (per state statute) or upon their own application, may work only at approved employment locations within the state.

  
Ernest Myers, Jr.

Signed and sworn to before me at Cranston on this 3rd day of June, 2015.

  
Roy D. Fowler      Notary Public

My Commission Expires February 15, 2019