

EXHIBIT 16

**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 LIEUTENANT MICHAEL REIS, DOC

I Michael Reis 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 Detail Crews of the Department of Corrections (DOC). I have served at the DOC for 33 years and have held a position supervising work details since 2002.

WORK DETAILS AND FURLOUGHS

2. The Rhode Island Department of Corrections employs approved inmates on "work details" (**not** the "work release" program) around the state. The inmates leave the facility in the morning and are transported by van to the outside work site or to the Correctional Industries buildings on campus. The inmates are generally not permitted to interact with the general public except as necessary to complete their work assignments. There are approximately sixty to one hundred inmates assigned to work details at any given time, up to sixty on the road/litter crews and up to forty on the Correctional Industries crews.

3. The potential locations of the work details are anywhere within the state borders as needed. Locations and scheduling are coordinated with the R.I. Dept. of Transportation's Highway Maintenance Division.

4. Incarcerated persons may be furloughed for a specific approved reason such as a funeral or a medical procedure. Furloughed inmates are transported to the relevant destination with no stops permitted. They are not permitted to interact with the general public and are usually accompanied by armed correctional officers.


Michael Reis

Signed and sworn to before me at Cranston on this 8th day of June, 2015.


Roy D. Fowler Notary Public

My Commission Expires February 15, 2019