

# EXHIBIT 17

**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 CHIEF INSPECTOR ROBERT CATLOW, DOC**

I Robert Catlow hereby declare that the following information is true and correct to the best of my knowledge and belief:

**BACKGROUND**

1. I am the Chief Inspector of the Internal Affairs Unit of the Department of Corrections (DOC). I have served at the DOC for 29 years and have held this position since 2012.

### **POLICE AND FIRE SERVICES AT THE ACI**

2. The Rhode Island State Police (RISP) maintains an office at the ACI staffed by two detectives. All requests for police assistance regarding potential criminal offenses originating at the ACI are first directed to the RISP.
3. Staff at the ACI might reach out directly to the Cranston Police Department (CPD) simply for notification of the following situations: an escape; a major incident or work strike; a safety hazard that might affect the general public; a work crew assignment within the City; or an incident where the CPD might be able to respond more quickly than the RISP.
4. Staff at the ACI uses the following procedures for fire issues. There is an internal radio code for fire. Upon notification of a potential fire issue, using the chain of command, correctional officer staff make a determination as to whether the issue can be handled within the facility or whether a 911 call is necessary. All corrections staff are equipped with a key to access emergency fire alarm call boxes and police phones which are placed strategically throughout the facilities. All fire alarm call boxes are wired directly to the Cranston Fire Department (CFD).
5. Persons incarcerated at the ACI are not permitted or able to make direct calls to the CPD or the CFD requesting assistance for themselves or their visitors.
6. Police, Fire or Emergency responses to the ACI by the RISP or the CPD are only recorded by the DOC if there is a serious injury or the incident qualifies as one of certain enumerated types of "Unusual Incidents" according to DOC policy. These reports are not computerized or searchable.

  
Robert Catlow

Signed and sworn to before me at Cranston on this 8<sup>TH</sup> day of June, 2015.

  
Roy D. Fowler      Notary Public

My Commission Expires February 15, 2019