

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

|  |   |                |
|--|---|----------------|
| _____                                    | ) |                |
| GEOFFREY PESCE,                          | ) |                |
|  | ) | C.A. No. _____ |
| Plaintiff,                               | ) |                |
|  | ) |                |
| v.                                       | ) |                |
|  | ) |                |
| KEVIN F. COPPINGER, in his official      | ) |                |
| capacity as Essex County Sheriff,        | ) |                |
| AARON EASTMAN, in his official           | ) |                |
| capacity as Superintendent of the Essex  | ) |                |
| County House of Corrections - Middleton, | ) |                |
|  | ) |                |
| Defendants.                              | ) |                |
| _____                                    | ) |                |

**DECLARATION OF RICHARD PESCE**

Pursuant to 28 U.S.C. § 1746, I, Richard Pesce, declare as follows:

1. I am 67 years old and live in Ipswich, Massachusetts, and am the father of Geoffrey Pesce.
2. My son, Geoffrey, suffers from opioid use disorder. With the guidance and care of physicians and clinicians, Geoffrey has been treated with medication-assisted treatment for almost two years. As part of this treatment, Geoffrey takes a prescribed dose of methadone every morning. The methadone keeps Geoffrey's substance use disorder in remission and allows him to lead a more normal life.
3. Geoffrey has lived with my wife and I both during periods of active addiction and during periods of medication-assisted treatment, so I have seen firsthand the life-changing benefits of methadone in my son's life.
4. When Geoffrey was young, he showed an innate mechanical ability. He could look at something and just know how to pull it apart and put it back together. His grandfather was an engineer and the two of them used to work on machines together all the time in the basement. It made sense when Geoffrey started working as a machinist soon after high school.

5. Unfortunately, he was introduced to opioids at work. This quickly led to several years of chaos in his life, as well as ours. It was an absolute nightmare.
6. Geoffrey lived with us at various times during his years of active addiction. When Geoffrey was using opioids, he was an entirely different person. The drugs controlled him, and he was not able to control what he was doing. He would do anything to get more drugs. He lied all of the time. In 2013, Geoffrey had a son. Unfortunately, the power of the drugs were so strong that he could not stop using even though he adored his son. Both he and the mother of the child continued to use opioids, and the Department of Children and Family Services wanted to take the child. Instead, my wife and I took guardianship of our grandson.
7. Geoffrey tried to stop using opioids several times before, but nothing worked. He would go through detox for a week and get out of the facility and go straight to his drug dealer because nothing had curbed his addiction. As a father, it was heart-wrenching to see my son go through this time and again.
8. I know that Geoffrey even tried Suboxone, but it was not able to help him achieve active long-term recovery. I was terrified that we were going to lose our child.
9. This all changed in December 2016 when Geoffrey began his methadone treatment.
10. As a result of the methadone, Geoffrey has been in active recovery for almost two years. My wife and I were first concerned about Geoffrey moving back home – we were afraid based on all of our experiences when he was using -- but we are extremely happy with how it has turned out. His thought processes are clear. He fixes everything in our house. And Geoffrey is back to doing what he loves, working as a machinist, contributing to the finances of our household, and spending time with his son. It has been incredible to see Geoffrey reconnect with his son, who looks at him like a father again. I had been afraid that would never happen. But because of the methadone treatment, it has. I feel like we finally got our son back.
11. I understand that under its current policy, the Essex County House of Correction – Middleton, Geoffrey will be barred from access to his methadone treatment during his imminent incarceration.

This terrifies me. I know that withdrawal is extremely physically painful, and I don't want my son to go through that. I am also very worried about the high risk of relapse and overdose. Geoffrey will be in jail, the cravings will have returned, and he will be surrounded by drugs. And his mother and I can't even be there to support him. I am afraid if he goes to jail without methadone that he will die.

12. I know first-hand about the fatal consequences of drug addiction. In our small town of about 13,000 people, I personally know at least six people who have died because of their opioid use. I don't want my son to join that list. I am afraid that, without methadone, Geoffrey could lose control over his opioid use disorder, with dangerous and potentially deadly consequences.

13. His methadone clinic is only a mile down the road from the Essex County House of Correction – Middleton. If they would let me, I would drive him to the clinic every single day. I just want to keep my son alive.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 18, 2018



Richard Pesce