

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

JOSEPH SCLAFANI, MICHAEL FEINSTEIN,  
and BRET CAPPOLA,

Plaintiffs,

CAROL A. MICI, in her official capacity as  
Commissioner of the Massachusetts Department  
of Corrections,

DOUGLAS DEMOURA, in his official capacity  
as Superintendent of MCI-Cedar Junction, and  
STEVE SILVA, in his official capacity as  
Superintendent of MCI-Norfolk,

Defendants.

C.A. No.

**DECLARATION OF PETER WALLACE**


Pursuant to 28 U.S.C. § 1746, Peter Wallace, declare as follows:

1. I am 46 years old. I was released from incarceration at MCI-Cedar Junction on December 10, 2019. I now live in Quincy, Massachusetts.
2. I have been diagnosed with opioid use disorder. Before I was incarcerated, my doctor in Quincy prescribed me 12 mg of Suboxone per day to treat my opioid use disorder. I was on my medically prescribed Suboxone for two and a half years.
3. Thanks to Suboxone, I entered into active recovery. The Suboxone kept the symptoms of opioid use disorder, like cravings, at bay. I did not use any illicit substances while I was on my prescribed Suboxone. I was proud of those two and a half years in active recovery. It was one of the best times of my entire life. I learned so much about what actual life was during that period of recovery.
4. I was incarcerated at the end of the summer of 2018 for missing probation appointments and failing to pay probation fees. During the start of my incarceration, there was no access to prescribed Suboxone and I was forced to detox. The withdrawal from my medically prescribed Suboxone was terrible and lasted about 30 days.
5. At the beginning of 2019, I heard that the Department of Correction might be starting a Suboxone program. At the time, I was at MCI-Shirley, and I started asking medical staff if I could get back on my prescribed Suboxone treatment. I put in many sick slips explaining that I had been prescribed Suboxone in the community and asking to be given access to the medication. But they would not do so.
6. I was transferred to MCI-Cedar Junction on July 26, 2019. Once again, I started asking whether I could get back on my prescribed Suboxone treatment. Both my mental health

provider and Dr. Hameed told me that Suboxone is only available at MCI-Cedar Junction for the first 90 days of incarceration and the last 90 days before release.

7. My release date was December 10, 2019. Since I was not yet 90 days from release when I started asking for treatment, the providers at MCI-Cedar Junction did not allow me to restart my Suboxone treatment. Dr. Hameed said I couldn't be put on the buprenorphine because I had more than 90 days left and therefore was not yet eligible for a buprenorphine prescription.
8. During my time at MCI-Cedar Junction, I also heard several nurses say that the buprenorphine program was only for 90 days.
9. Finally, around September 16, Dr. Hameed prescribed me 2 mg per day of buprenorphine. She said I was at my 90-day mark, so she would now prescribe my medication. She bumped me up to 4 mg per day of buprenorphine around October 16, and 8 mg per day of buprenorphine around November 12.
10. Even though I am now back out in the community, I don't want anyone to have to go through withdrawal from their prescribed buprenorphine treatment while they are at MCI-Cedar Junction. I know how awful withdrawal is, and I believe people shouldn't be denied access to their medicine.

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

  
Peter Wallace

Executed on December \_\_\_\_, 2019