

Affidavit of Rachel Bolton

I, Rachel Bolton, state that the following is a true and accurate statement to the best of my knowledge and belief:

1. I am the program and outreach coordinator at Material Aid and Advocacy Program (“MAAP”), and have been in this role for approximately six months. Prior to joining MAAP, I worked for a year and a half as the outreach coordinator at the Access: Drug User Health Program, which is run through Fenway Health. Access is a state-sanctioned and state-funded needle exchange program, and is also one of the state’s pilot sites for the distribution of Narcan to intravenous drug users and their network of family and friends to reverse potentially fatal overdose. Before Access, I worked as direct care staff at the Women’s Lunch Place, which is a daytime shelter that serves more than 150 women daily and advocacy center, for two years.
2. I have a degree in politics from Pitzer College in California. I have received training to administer Narcan in 2018, and in 2021, I was certified as a master trainer—which is someone who trains people to become Narcan trainers—by the Massachusetts Department of Public Health. I have also been trained by Riverside Community Health, the Justice Resource Institute, and Reach Beyond Domestic Violence in trauma-informed care for unhoused people, people who have survived domestic or sexual violence, people experiencing mental health issues and people who use substances.
3. Collectively, I have been working with unhoused people, people with mental health issues, and people who use substances in Boston for more than four years. Through these professional experiences, I have interacted with people in these communities on a daily basis, speaking with them about their needs and exploring different ways to try to meet those needs. At MAAP, we have a twice-weekly drop-in for unhoused people to access community and material aid. We also go out to the streets to speak with people on at least a weekly basis.
4. In my role as a volunteer, and later, as a full-time employee at MAAP, I have been doing weekly outreach to people living in the Mass & Cass area for about a year. During this time, I have personally observed Boston Health Care for the Homeless doctors and nurses provide medical treatments to people who are residing in the area, and have seen how easy it is for them to find their patients to provide medical care at Mass & Cass.
5. Since September 2021, I have been in the area between 2-3 times a week. During these visits, I provide a selection of offerings that people have identified as useful—including food, water, trash bags, masks, condoms, hand sanitizers and wipes—and speak with people about their safety planning. As

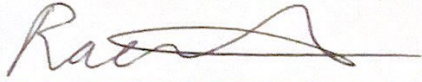
people have become increasingly anxious about the displacements, I have brainstormed with people about the potential risks of moving away from community and medical providers and what they can do to try to address those risks.

6. I personally witnessed the September sweeps that occurred before the Executive Order was issued. During these displacements, I heard BPD officers say “you have to move,” and Office of Recovery Services’ employees tell people, “you can’t be here,” without offering any alternative housing options. In September, many people who were displaced from Topeka moved to another location within the Mass and Cass area.
7. I also personally witnessed post-October 19th displacements that occurred after the Executive order was issued, including on November 1, November 3, November 8, November 10, and saw the attempts to displace people on November 12.
8. Based on my professional training, I know that best practices for street outreach and trauma informed care involve a limited number of people approaching individuals with support and alternatives, and then respect people when they express that an offering is not viable for them.
9. The post-October 19th displacements that I personally witnessed did not reflect these practices. Instead, I saw groups of 7-10 BPHC employees surround people and crowd them while telling them they could not stay in this location. I heard BPHC employees repeatedly tell people that congregate shelter was their alternative option. I never heard a BPHC employee acknowledge that someone may not be able to stay in a congregate shelter because of a physical or mental health issue and/or because of a safety concern. To the contrary, in response to people indicating that they could not go to a shelter, I have heard BPHC employees state that a shelter was going to be a better place for them. I never heard a BPHC employee offer an alternative housing option to shelters that was immediately available to the person at the time of the displacement.
10. As the post-October 19th displacements have continued, I have seen BPHC and City employees begin the morning going tent-to-tent to wake people and tell them it is time to pack up. BPHC will then initially focus on and surround the people who have begun to move. As the day progresses, I have heard BPHC employees say “get moving” to people who are still in the area; again, the only immediately available alternative I have ever heard a BPHC employee offer at the time of the displacement are shelters.

11. On November 10th, I heard a City employee from the Office of Recovery Services tell a woman who said she was moving to New Market Triangle, “there are no other spots to go, we are sweeping there on Friday.” That same day, I heard a BPHC employee say “alright, let’s wrap this up” while circling his finger in front of a fully set up tent, indicating that people needed to finish the task of clearing out someone’s residence.
12. I have also personally witnessed the disposal of people’s personal property during the post-October 19th displacements. I have never seen an instance in which a person was offered enough containers to store all of their belongings; in every case, I have seen people forced into a choice about what they were going to carry or throw away. I have never seen a government employee explain how a person could have regular access to items in storage. Without such regular access, storage is not a real choice for people who are being asked to move items that they rely upon on a daily basis.
13. I have personally witnessed people whose items have been thrown out during the post-October 19th displacements. As a tent or other shelter is taken down by BPHC or others, the tent and all that is still inside or beside it is then pushed into the road and loaded onto a garbage truck. I saw a man in his 70s who saw all of his belongings thrown into the garbage truck, including his tent and his mattress. He was understandably devastated, as he had no idea what he was going to do that night. I also saw a woman sitting in the street on a wheelchair without a tent. She explained to me that despite her efforts, BPHC threw away her tent. As a result, she said, “I am still here, I just don’t have my tent.”
14. Based on my years of experience working with the unhoused community, I am very familiar with the policies, rules and environment at Pine Street, 112 Southampton Street and Woods-Mullen. I have seen many instances where congregate shelter is not appropriate for a person, including due to their mental health needs. Many of the women who I worked with at the Women’s Lunch Space lived in a shelter. During my time at the Women’s Lunch Space, I personally worked with at least 10-15 people to brainstorm alternatives to a shelter that was not viable for them because their mental health issues had been triggered or exacerbated by the congregate living environment.
15. I have personally seen an increase in people who are living by themselves or in less safe environments in Boston post-October 19th displacements. On November 3, Cassie Hurd and I drove to the South Bay Shopping Center, as an extra outreach precaution to check-in on folks who may have been pushed out of the Mass & Cass area. When we arrived, we saw a person who was splayed on the ground. Because we had happened to arrive at that moment, we were able to sit with the person for two hours, monitor his breathing and

responsiveness, and then identify people who could sit with him with Narcan on hand to make sure his needs were met. I do not know what would have happened if we had not happened to arrive when we did, as people are no longer surrounded by their community with people who know how to take care of them if something happens. People had that kind of support when they were residing in the Mass and Cass area.

Signed under the pains and penalties of perjury this 16th day of November, 2021.

A handwritten signature in black ink, appearing to read "Rachel Bolton", written over a horizontal line.

Rachel Bolton