

### Third Affidavit of Cassie Hurd

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

1. This supplements the two previous affidavits I have submitted in this case.
2. I am a graduate of UMASS Boston with a Bachelor's degree in Sociology and American Studies.
3. I have been working with persons with substance use disorder and those who are unhoused for more than 15 years.
4. In the early 2000s, I worked for 3 years at Bay State Community Health providing peer education to young people regarding public health and substance use. I also am an active member in the organization Safe Injection Facilities in Massachusetts Now (SIFMA Now!), which advocates for the implementation and expansion of evidence-based harm reduction strategies, including supervised consumption sites in Massachusetts, for people who use substances, including those with substance use disorder.
5. I joined MAAP, then a program of the American Friends Service Committee, in 2006 as a program assistant. I became the program coordinator in 2009, and the Executive Director in 2017. My daily role at MAAP entails working closely with unhoused people and people with substance use disorder to explore their needs—including material, physical and mental health needs—as well as ways to meet those needs. This has included meeting with people during our twice-weekly drop-in space in Cambridge and at least weekly visits to meet with those who are unhoused on the streets of Boston. During my 15 years at MAAP, I have regularly worked with unhoused people who have spent time in congregate shelters in Boston, including Pine Street, 112 Southampton Street, and Woods-Mullen on a weekly basis, and previously worked with community members who stayed at Long Island before it closed.
6. I have received specialized training in trauma informed care, harm reduction, overdose recognition and response, and problem solving and safety planning through multiple trainings from DPH-licensed presenters. I have also provided bystander awareness training to support unhoused people who are unsheltered to Harvard Divinity School students.

7. In my capacity as Executive Director of MAAP, I was present at the Mass and Cass displacements that occurred in August 2019 discussed in my previous affidavits.
8. This year, in my capacity as Executive Director of MAAP, I did outreach and met up with community members living in the Mass & Cass area on a regular basis and quite frequently since August when rumors of displacements began to spread. Most recently, I have been there in person on September 15<sup>th</sup>, September 20<sup>th</sup>, October 25<sup>th</sup>, October 26<sup>th</sup>, October 28<sup>th</sup>, November 1<sup>st</sup>, November 3<sup>rd</sup>, November 8<sup>th</sup>, November 10<sup>th</sup>, November 12<sup>th</sup>, and November 13<sup>th</sup>. During these outreach sessions, people living on Mass and Cass approached me because of the trusting relationships we had built over the past few years. I also approached people, and offered material support. Many of these conversations evolved to safety planning and strategizing about ways to reduce risk of death in the face of the encampment sweeps. With their permission, I am often present or very nearby when they talk to other service providers, including medical staff and housing search providers. In conjunction with this work, I personally witnessed the encampment displacements discussed in my previous affidavits and in addition was present as people were pressured to leave on November 12, 2021.
9. I was not at Mass & Cass on November 5<sup>th</sup> because I had not seen any notices for a planned displacement on that date. Nevertheless, the City did displace people on that date.
10. At each of the displacement actions I have observed and offered support at since October 19, BPHC staff move in groups, often crowding around individual tents, urging people to move along, forcing residents to leave with whatever they can carry or move with them. After residents move away, either BPHC staff or other unhoused individuals they or someone has hired, step in and tear down the shelter and throw it and all that remains in it into the street for pick up by City garbage trucks that soon come by. BPHC police and BPD officers are often waiting close by or just down the street.
11. During the post-October 19 displacements I have personally observed, I never heard BPHC staff or any other government employee offer a resident an alternative housing option that was immediately available other than a congregate shelter bed. Indeed, I have heard residents tell BPHC staff that they cannot go to congregate shelters because of various circumstances,

including disabilities, in response to which I have only heard BPHC staff tell the residents that congregate shelter is better than the streets.

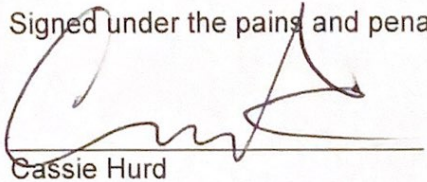
12. Since the post-October 19 displacements began, many people with whom I have close relationships through MAAP have fled the area without any alternative shelter or housing options. One of our community members moved to the woods because she was forced to leave the encampment and was not offered any alternative housing options that would meet her needs and was scared of arrest if she remained, even though that meant she would be disconnected from access to daily medication. I have lost touch with at least half a dozen people who had previously interacted with MAAP on a regular basis.
13. Since November 1, 2021, on various days there has been a C-6 transport vehicle on the corner of Theodore Glynn and Southampton; other police regularly drive through and sometimes run their sirens or bark orders at residents from their cars. Against the backdrop of the general police presence and the creation of the “community response session” of the BMC at Suffolk County House of Correction,” people have become increasingly afraid of arrests, particularly as more and more areas in the Mass & Cass area have been cleared out and fenced off and they have been told they cannot remain.
14. Because one of the services we offer at MAAP is consultation about safety planning, I have familiarized myself with the general policies and practices at each of the primary Boston shelters for single adults. I have personally visited Pine Street Inn, 112 Southampton Street, and Woods-Mullen shelters and have had many conversations with residents as Mass & Cass who have stayed there and feel they cannot do so again.
15. In my professional capacity, I know people who are unable to stay in the shelters due to mental health issues that prevent their ability to conform to some of the shelter’s rules or that render the heavily congregate setting of these shelters severely traumatizing.
16. In my professional capacity, I know an individual who was unable to stay in a shelter because they could not store the needles that they needed to use injectable testosterone as part of their transition.
17. In my professional capacity, I know people who have either been banned from shelters due to behavioral incidents stemming from their mental health issues or who are uncertain whether they have been barred from a shelter

and are afraid to return because they fear they will be charged with trespass if they do so.

18. As of Saturday, November 13<sup>th</sup>, I saw approximately 35 tents in New Market Triangle and 15 tents on Atkinson Street.

19. There are many reasons why the storage options “offered” by the City or BPHC are not real options. For one thing, the quantity that can be stored is limited. For another, as discussed in prior affidavits, the phone numbers to arrange storage in advance of displacements regularly go nowhere. For another, and very importantly, people need the items in their possession for daily survival and cannot have them locked in a storage facility until they hopefully, someday will be permanently housed.

Signed under the pains and penalties of perjury this 15<sup>th</sup> day of November, 2021.

A handwritten signature in dark ink, appearing to read 'Cassie Hurd', written over a horizontal line. The signature is stylized and cursive.

Cassie Hurd