

KATHLEEN JONES, et al., on behalf of
themselves and all individuals similarly
situated,

Plaintiffs,

v.

GEORGE W. HAYMAN, et al.,

Defendants.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION – GENERAL
EQUITY
MERCER COUNTY

Docket No. C-123-07

**CERTIFICATION OF
KATHLEEN JONES**

Kathleen Jones hereby certifies as follows:

1. I am a medium-security status prisoner confined in unit 1EE in New Jersey State Prison (NJSP). I am a plaintiff in the above captioned case.
2. On Wednesday, April 2, 2008, a sergeant took me out of my work shift, telling me that SID [the Special Investigations Division] wanted to talk to me. I was taken to the little room in unit 1EE where they draw blood.
3. A man named Leto Salvatore and a woman whose last name is Jones were in the room. They said they were from SID.
4. During the meeting, the way they talked to me and the things they asked made me feel cornered. I felt like it was an interrogation, and like they were trying to trick me.
5. At first they asked me if I was familiar with the letter that was going around. By “the letter,” they meant the statement that some of the other women have signed and that were sent to the court. They said “Would you be comfortable saying the

letter came from an inmate?" They seemed to want me to tell them that it came from an inmate.

6. They asked when I came here to NJSP, and they asked if I agreed that programs are getting better and that we're getting more things than when we first got here. They were trying to get me to agree that things are good here.
7. Mr. Salvatore said that just yesterday, he had spent about two hours with Ms. Ricci. He said "I know she's very concerned," about the women prisoners. I said I wanted things in the prison to change. Mr. Salvatore said that Ms. Ricci takes our needs really seriously and is doing all that she can for us. I told him that I don't think she cares at all. I said that when she comes on the unit she doesn't talk to the women, and when women call out to her, she ignores them. When I said these things, Mr. Salvatore looked at me like he didn't want to hear them.
8. Then Mr. Salvatore started talking about Edna Mahan Correctional Facility. He tried to get me to agree that things are bad there, because of the group housing there. He said that it's crazy over there. He was trying to establish that because there are single cells here and a smaller unit, that it's much better here than in Edna Mahan. I told him that we're in our cells too much and that there are people here who don't like to be locked in. Mr. Salvatore tried to convince me that things are better here.
9. When I tried to tell Mr. Salvatore that most of us are medium security status, he didn't let me finish. He said, "Yah, but you can't tell me that you'd rather be there than here." The way he talked didn't sound professional to me, his tone was bullying.

10. Mr. Salvatore referred to Leslie Nelson, a woman who was held here before and who first got in contact with the ACLU lawyers. He said, "You know where she is now?" I knew that Ms. Nelson had been sent back to EMCF because she was so stressed out by being brought here that the psychiatrist ordered her to be sent back. Mr. Salvatore said that if women really wanted to go back, they could take the medical route. By that, I think he meant that if women really want to go back, they can say they have a mental illness and go on medication so they'll be sent back.
11. Mr. Salvatore asked me about a certification I had made previously. He had the certification with him, but he didn't show it to me. He tried to say that something I said to him contradicted something in my certification. I told him that I wasn't saying anything inflated or exaggerated, that there are injustices happening and that what I've said is true.
12. Mr. Salvatore started talking to me about the Administrative Remedy Form process. I told him that I don't think some of the forms I handed in ever made it out of the unit to administrators. Mr. Salvatore said, "Come on, you're saying of all three shifts, all these officers, there's not a single officer you can trust?" His tone was unpleasant and patronizing.
13. Mr. Salvatore said it sounded like I only had a few complaints about phone calls and panties and bras, and he wanted to me sign a statement to that effect. I could tell that he wanted me to say that it wasn't that bad here, or even that I wanted to back out of the lawsuit. I refused to sign any statement.
14. At the end, Mr. Salvatore told me not to tell anyone about our meeting.

15. Mr. Salvatore never asked me whether my meetings with my lawyers had been listened in to. He didn't ask about the forms that the women have to sign before they can see an ACLU lawyer.

I certify that the foregoing statement made by me is true. I am aware that if the foregoing statement is willfully false, I am subject to punishment.

Dated: 4/10/08

By: Kathleen Jones

Kathleen Jones