

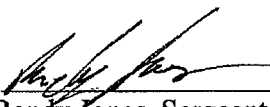
AFFIDAVIT

Sergeant Randy Jones, Correctional Officer at Westville Correctional Facility, which is part of the Indiana Department of Correction, affirms and swears to the following:

1. That I am a Correctional Officer at Westville Correctional Facility.
2. That I have been assigned to WCU unit of Westville Correctional Facility since December 11, 2022, currently assigned to B Pod.
3. That I have been an acting supervisor in A Pod, where the Defendant is housed, since late February/early March of 2023.
4. That I do not practice Odinism and that Norse Paganism Heathenry is my practicing religion.
5. That I do wear patches on my uniform that identify me as someone who practices Norse Paganism Heathenry.
6. That I started wearing the patches 6 or 7 months ago and I did not stop wearing my patches until September 22nd, 2023, when ordered by my command to remove the patches.
7. That the patches do not represent racism or a hatred for anyone.
8. That I am not part of a cult.
9. That I am not part of a radical hate group.
10. That the patches show my dedication to my faith and to my country.
11. That the Defendant is filmed with a handheld camera when he is moved from the cell for his safety.
12. That I interacted with the Defendant when I was in charge of holding the handheld camera to film his movements when he is moved from his cell to another area within the facility.
13. That I was also assigned periodically to check on the Defendant at his door with his 15-minute checks implemented by his mental health plan.
14. That during the door checks, I would walk to the Defendant's cell, make sure he is okay and not at risk of self-harm and then walk away.
15. That I have never threatened the Defendant.
16. That I have never had a one-on-one conversation with the Defendant about Odinism.
17. That I do not know anything about the practice of Odinism.
18. That I have never had a one-on-one conversation with the Defendant where I tried to influence him in any way.
19. That I have gone above and beyond to not use any kind of force on the Defendant, even though there have been times when use of force was justified by standard operating procedures.
20. That there have been times when I have gone above and beyond in order to be gentler with the Defendant to prevent him from getting tased.

21. That the Defendant was tased twice between May 9th, 2023 and May 25th, 2023 because we could not get him to comply with our orders.
22. That I have never had an excessive force complaint filed against me while I have been employed at Westville Correctional Facility.
23. That I have been employed with the Department of Corrections since April 4th, 2022, and that this job is my passion and what I love doing.

I swear, under penalty of perjury, as specified by IC 35-44-2-1, that the foregoing representations are true and accurate to the best of my knowledge.

Signed: 
Randy Jones, Sergeant
Westville Correctional Facility