

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

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John Doe et al.	:	
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<i>Plaintiff,</i>	:	
	:	
v.	:	C.A. NO. PC-2022-06877
	:	
Governor Daniel McKee	:	
	:	
<i>Defendant</i>	:	
	:	
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AFFIDAVIT

I, Joseph Lindstrom, being duly sworn, hereby deposes and says:

1. I am a Chief of Program Development and am employed by the State of Rhode Island. I have been in my current position since November, 2022. Prior to that time, I worked for the National Low Income Housing Coalition from February, 2013 to March, 2022. From April 2007 until January 2009, I led the legislative committee for the Homeless Services Consortium of Dane County in Wisconsin. From April, 2001 until September, 2004 I also ran homeless outreach for Tellurian UCAN, Inc. in Wisconsin.
2. On Saturday December 10, 2022, I was present at the State House encampment for fifteen hours, from 7:00AM until 10:00PM, performing direct outreach to the persons encamped there. I left the area only for short periods of time to obtain food or to go get additional office supplies/answer phone calls inside the State House. During that time, I personally went from tent to tent multiple times and made contact with all persons there.
3. On Sunday December 11, 2022, I was present at the State House encampment for twelve and a half hours, from 8:00AM until 8:30PM. I left the area only for short periods of time

to obtain food or to go get additional office supplies/answer phone calls inside the State House. During that time, I personally went from tent to tent multiple times and made contact with all persons there.

4. On Monday December 12, 2022, I was present at the State House encampment on and off throughout the day and then continuously from 6:00PM until 8:15PM. During that time, I personally went from tent to tent multiple times and made contact with all persons there.
5. On Tuesday December 13, 2022 (date I am signing this affidavit), I was present at the State House encampment from 9:00AM to 10:00AM. During that time, I personally went from tent to tent and made contact with all persons there. I also went to the Amtrak Station and Providence Place Mall in an attempt to locate individuals from the encampment who may have been at those locations so that I could offer them shelter. It is my intention to return to the encampment this afternoon and to remain there through the evening.
6. Below is a summary of my outreach efforts (*updates from 12/13/2022 in red and italicized*):
 - a. I spoke with Frank Leonard and offered him shelter at Harrington Hall. Frank Leonard declined this shelter offer. Frank indicated that he is only interested in permanent housing or a hotel room.
 - b. I spoke with Gregory Wright and offered him shelter at Emmanuel House, Harrington Hall, and the Providence Rescue Mission. Gregory Wright declined these shelter offers and is interested only in permanent housing or a hotel room. *Offered Emmanuel House again; declined again.*

- c. I spoke with Robert Carmoday and offered him shelter at Harrington Hall. Robert Carmoday declined this shelter offer. I spoke with him again on a subsequent day and offered him Emmanuel House and Robert Carmoday declined this shelter offer.
- d. I spoke with Charles Watson and Joalene Shreffler. I offered them shelter at the Providence Rescue Mission. Both declined. *Offered again; declined again.*
- e. I spoke with Louis Medico and offered sober housing at New Hope Christian Ministry and also shelter at Providence Rescue Mission. Louis Medico declined these shelter offers. *Offered Emmanuel House again; declined again.*
- f. I spoke with Donna Bouthillier who indicated that she was not interested in a shelter offer. Despite this, I attempted to find her again to offer her an open bed later in the day, but she was not present. I was able to contact Donna Bouthillier on December 12, 2022 and offered her Providence Rescue Mission. Donna Bouthillier declined this shelter offer.
- g. I spoke with Lisa Hodges who indicated that she is interested in shelter but that she will not separate from her dog and most shelters do not allow animals. Lisa Hodges reported that Crossroads does allow animals, but that she is no longer allowed at Crossroads because her dog bit another person. She indicated she would return to Crossroads if allowed. *Attempts continue to find housing that will accept her with her dog.*
- h. I spoke with Adam Northrop who indicated that he is homeless but that he does not sleep at the encampment. *Offered Emmanuel House and it was accepted, but Adam did not come to the van at the predetermined time.*

- i. I spoke with Alexandria Gonzalez who indicated that she was homeless fifteen years ago, but that she is not currently homeless or using the encampment.
- j. During my continuous time at the encampment, I did not observe the following individuals in the area of the encampment: Christine Clairborne (*offered through counsel; declined*), Jermaine Johnson (*could not reach at number provided*), Pamela Sivo (*could not reach at number provided*), Michael Procaccianti (*could not reach at number provided*), Philip Unrine (*offered Emmanuel House and he declined; currently housed*), CJ Miller (*not homeless- activist*), Joseph Papineau (*not homeless- activist*), Brandon Hong (*upon information and belief, not homeless*), Michael Nugent (*upon information and belief, incarcerated*), Gavin Finnerty (*list says "contact case worker" but no number provided*), Christine Gonzalez (*at Thrive*), Rachel Jordan (*living with boyfriend; housed*), Herbert Jordan (*at Crossroads, sheltered*), or Kimberly Haas (*at Crossroads, sheltered*).
- k. During my time at the encampment, I interacted with fourteen individuals whose names were not listed by Plaintiff's counsel. (As of December 11, 2022 it was thirteen individuals, but one new person was first present at the encampment on December 12, 2022 bringing the number to fourteen.) Of those, I offered shelter to seven persons who accepted shelter. I offered shelter to two persons who declined shelter. Two of the persons were only interested in a shelter where they could remain during the day due to a disability. Shelter has been arranged for those individuals but I could not locate them again at the encampment on December 12, 2022 or so far on December 13, 2022. Three additional persons could not be found again at the encampment when a shelter bed became available. I intend to continue to seek out the

five individuals who I have not been able to locate again, I went today to the Amtrak Station and the Providence Place Mall in furtherance of that effort. As noted above, I will also return to the encampment today in furtherance of that effort. *Could not find the three individuals I was looking for yesterday. I contacted couple yesterday through phone. Kept saying they would return and waited until 11pm. They did not arrive. If they return today I will offer shelter.*

Joe Lindstrom

Print Name: Joseph Patrick Lindstrom

Subscribed to and sworn to before me the 14th day of December, 2022.

Nancy J. Russolino

NOTARY PUBLIC

My Commission Expires: January 17, 2024



CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2022, the within document was electronically filed and served on all counsel of record through the Rhode Island Superior Court Case Management System by means of the electronic filing system (EFS) and is available for viewing and/or downloading by counsel of record.

/s/ Stephen D. Lapatin _____