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Of Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

**PRISON LEGAL NEWS, a project of the
HUMAN RIGHTS DEFENSE CENTER,**

No. CV12-0071-SI

Plaintiffs,

v.

DECLARATION OF BRYAN CUTRIGHT

**COLUMBIA COUNTY; COLUMBIA
COUNTY SHERIFF'S OFFICE; JEFF
DICKERSON, individual and in his capacity
as Columbia County Sheriff,**

**In Support of Defendants' Response to
Plaintiff's Motion for a Preliminary Injunction**

Defendants.

I, Bryan Cutright, declare as follows:

1. I am a Sergeant at the Columbia County Jail (the Jail). I have worked for the Columbia County Sheriff's Office for about seventeen years, all of which was at the Jail. The statements in this declaration are based on my personal knowledge.
2. I am familiar with how the corrections staff at the Jail inspects mail. I estimate that we receive about fifty pieces of mail per day addressed to inmates. Approximately ten to fifteen pieces of mail are legal mail. The rest of the mail is primarily personal mail from an inmate's family or friends. Personal mail must be inspected thoroughly for contraband and for prohibited

content. Each piece of mail is scanned via the use of a bar code scanner as incoming or outgoing mail. I estimate that inmates send about forty pieces of mail per day to whomever they wish.

3. Before the postcard policy was implemented in 2010, the Jail received personal mail in envelopes of a variety of sizes. The envelope was opened and the envelope and papers inside were inspected for contraband, such as sticky substances or prohibited items. Both sides of the paper were inspected to see if prohibited content was discussed. The inmates used pencil and notepad paper to draft letters. Their outgoing mail was inspected for contraband and for prohibited content. Although there is less risk that outgoing mail contains contraband, it still must be inspected. On average, the booking deputy spent 1.5 to 3 hours of his or her shift on inspecting the incoming and outgoing mail, depending on the volume of mail.

4. In March, 2010, when the Jail began to require most incoming and outgoing mail to be on a postcard, the time it took the booking deputy to inspect incoming and outgoing mail was reduced by one-third (approximately 30 to 60 minutes depending on the volume of mail). Some of the factors making inspecting postcard-sized mail quicker are: (a) postcards are easy to hold in one's hand (b) postcards are easy to turn over to inspect both sides (c) postcards are on thick paper, which makes them durable and (d) it is easier and quicker to scan postcards than other types of paper such as notepad paper. There is also less risk of contraband being present because a postcard is a standard-sized single piece of paper; contraband—such as bodily fluids and small metal objects—can be hidden between sheets of paper.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Respectfully submitted this 20th day of February, 2012.

By:


Bryan Cutright