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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

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

Plaintiff,

v.

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

Defendants.

No. CV 12-71-SI

DECLARATION OF SHARON R. BERG

I, Sharon R. Berg, declare as follows:

1. I am over the age of 18 and I am competent to testify. The statements of fact contained herein are based on my personal knowledge.

2. I am Bradley L. Berg's mother. Brad has been incarcerated at the Columbia County Jail since January 2011.

3. I wrote many letters to Brad while he was incarcerated in other correctional facilities. I value being able to stay in touch with Brad. It is important to me that Brad is able to share his concerns with me without being concerned about privacy.

4. The Postcard-Only Policy at the Columbia County Jail has been very frustrating for me. I have a lot to share with Brad. It seems like as soon as I start writing a message to Brad on a postcard I have to end my message because of the size limitations, unless I send multiple postcards which means I have to buy additional stamps.

5. I am concerned about the lack of privacy. I don't want to share confidential information with Brad on a postcard that people I don't know can read. He told me he has the same privacy concerns, and does not feel he can communicate with me about matters that he feels are confidential.


6. Conforming my communications with Brad to the Jail's restrictive Postcard-Only Policy is a hassle. I don't ordinarily have postcards on hand and have to make a special trip to the post office or the souvenir section in a store to buy postcards. They can be more expensive than stationary which can get spendy. I tried making my own, using card stock from the craft store, but the Post Office returned the postcards to me as unacceptable, which only added to my frustration.

7. I do not drive, so it is difficult for me to visit Brad in person. The letters we wrote to each other when he was incarcerated at other facilities in the past were our primary means of communication. The Jail's Postcard-Only Policy has severely limited our ability to communicate with each other.

8. I am very fortunate in that Brad is not only my son but my good friend. I miss him very much. Every week I wish I could write him a letter, but I know I can't.

I declare under penalty of perjury of the laws of the United States of America and the State of Oregon that the foregoing is true and correct to the best of my knowledge.

DATED this 01 day of MAR., 2012 at Portland, Oregon.

  
Sharon R. Berg

**CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2012, I electronically filed the foregoing to the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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*/s/ Katherine C. Chamberlain*

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