

AFFIDAVIT

John Galipeau, the acting Warden of Westville Correctional Facility, which is part of the Indiana Department of Correction, affirms and swears to the following:

1. That the Defendant, Richard Allen, is housed in the Westville Correctional Facility in the segregation unit.
2. That the Defendant is housed in that unit for his protection.
3. That the cell that the Defendant is housed in is a 12 X 8 cell which is the standard size cell in that facility.
4. That the correctional officers guarding the Defendant are assigned to that unit by myself and command.
5. That Correctional Officers at Westville Correctional Facility were allowed to wear any patches on their vests until the allegations made by the Defense in their motion.
6. That Westville Correctional Facility offers religious services if there are at least 5 individuals that practice the religion in the complex and to date we have not had more than 5 individuals in the complex request to hold services related to Odinism.
7. That the Defendant is on video while he is in his cell and when he is moved from his cell.
8. That the Defendant is monitored by at least 3 correctional officers at all times during movement.
9. That Sergeant Randy Jones and Sergeant Joshua Robinson were never placed on duty at the cell door to act as suicide companion of the Defendant one on one.
10. That I have never received any reports that Sergeant Randy Jones and Sergeant Joshua Robinson have mistreated the Defendant.
11. That no one in the facility has ever been ordered by command to threaten, harass or put the Defendant in danger.
12. That the Defendant is housed by himself and does not have any direct contact with other inmates.
13. That I do not have an agenda or a vested interest in keeping the Defendant incarcerated in a facility that is ripe with connections to Odinism.
14. That Westville Correctional facility has very few inmates that practice Odinism.
15. That none of those inmates are housed with or next to the Defendant.

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: _____

John Galipeau, Warden
Westville Correctional Facility