

State of New York
County of New York

Before me, the undersigned authority, personally came and appeared:

Anne Leddin Gell

Who, after being duly sworn, said:

I am an attorney licensed in New York. I graduated from Columbia University Law School in 2009. My undergraduate degree is also from Columbia in 2003. I am a Lawyers Earthquake Response Network Fellow volunteering in Port-au-Prince, Haiti, with the Bureau des Avocats Internationaux (BAI). I have been in this position since September, 2010.

On November 20, 2010, I visited the Haitian prison in Saint Marc with my colleague Beatrice Lindstrom who is also a LERN lawyer, and Regine Theodat, a Haitian-American attorney with the Lamp Foundation.

St. Marc is in the Artibonite Valley, where the cholera outbreak started in mid October 2010. People are suspected of contracting cholera from the waters of the Artibonite river which provides most of the water for drinking, washing clothes and sanitation for the area.

The St. Marc prison held 411 prisoners when we visited. The population consisted of 379 men, 18 women and 14 minors. A chalkboard tells us that half the prisoners are awaiting trial, half (198) are serving sentences. Those in pre-trial detention are not separated from convicted prisoners.

The prison is a two story concrete building with an open courtyard in the middle. In the middle of the courtyard is a pump which provides water for the prisoners.

The prison cells were concrete on three sides with metal bars in front facing the courtyard. In each cell there were about twenty men. There was one cell for all 18 women. There was no running water or washbowl or toilet in the cells. There were buckets in each cell. Prisoners defecate in the buckets in their cells.

Cholera was first reported in the prison a week before we visited. When we visited there were 24 cases of cholera suspected among the prisoners.

Prison officials advised us that there is no clean water for the prisoners. The water from the prison pump came from the Artibonite river, the source of cholera. This is the only source for washing or drinking. Prison officials told us they treat the water from the pump with donated purification chemicals so that prisoners do not get rashes from bathing and washing their clothes in the water. However, the water treatments do not clean the water enough for safe drinking.

Despite this, the prisoners get all of their drinking water from this pump.

There were two cells which were set aside for cholera patients. They were on the second floor of the prison also facing the courtyard.

The first cell was for prisoners suspected of having cholera because they were symptomatic with diarrhea and vomiting – there were about 15 people sitting in that cell. There were no toilets and no running water.

Next door was the cholera cell. The cell was for prisoners who were severely sick and dehydrated. There were six or seven people in this cell. All were laying down on elevated mats. All had IVs in their arms. They were on “cholera beds” where round holes were cut in the middle of the mats with a bucket underneath. This cell was quiet. There was one caregiver in this cell with the prisoners. The caregiver was a woman prisoner.

Food for prisoners in Haiti is mainly provided by family members on the outside. At the entrance to the prison was a sign setting out the times when people could deliver food.

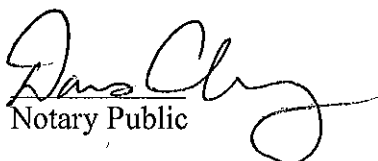
At the time of our visit, one prisoner had already died in this prison from cholera. As of November 20, cholera had spread to many of Haiti’s prisons including the main prison in Port-au-Prince. The International Committee for the Red Cross reported in late November that at least six prisons in Haiti have cholera. 174 detainees had been treated so far and 22 prisoners had died.

As of November 19, 2010, the day before our visit to St. Marc prison, the government of Haiti reported there were 1,186 reported deaths from cholera and 19,646 reported cases of cholera. As of mid December the government of Haiti reported there were 2,323 reported deaths from cholera and 104,614 confirmed cases.

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Sworn to before me this 16th day of December 2010.



Notary Public

DARIUS CHAPNEY
Notary Public, State of New York
No. 02CH6136665
Qualified in Kings County
Commission Expires Nov. 14, 2014