

EXHIBIT 3

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

STEVEN J. HAYES : CIVIL NO. 3:14CV01203 (AWT)

v. :

ANTHONY BRUNO, ET AL. : SEPTEMBER 18, 2014

AFFIDAVIT OF RABBI ROBERT SCHECTMAN

I, Rabbi Robert Schectman, being duly sworn, depose and say that:

1. I am an ordained rabbi and I was employed by the Connecticut Department of Correction (DOC) as a Jewish Chaplain. I retired on May 1, 2013, after more than 14 years working for DOC. I provided for religious services to Jewish inmates and consulted with the Director of Religious Services for DOC with regard to Jewish religious issues, such as Kosher dietary requirements. I also consulted with and provided advice to the DOC Director of Food Services with regard to Kosher requirements for foods and food production. I personally observe Jewish Kosher dietary law, and have provided expert affidavits to this Court on the subject of Kosher requirements on prior occasions.

2. I am familiar with the Department of Correction's Common Fare program and I am familiar with the plaintiff, Steven Hayes, having worked at Osborn CI and Northern CI, and having spoken to him on several occasions when I was working in the Connecticut DOC.

3. I was involved in development of the Common Fare program in connection with the Islamic chaplains, and in particular DOC's Islamic expert, Imam

Hasan, and expert dietary officials. I was also involved in on going compliance and monitoring of issues related to the Common Fare menu for more than thirteen years. On periodic occasions I visited the York CI production kitchen, and other DOC facilities' kitchens, inspected the kitchens, reviewed policies, procedures and food labels, and kitchen operations. I have spoken with the Correctional Food service supervisors, conferred with Imam Hasan, who joined me on my site visits and I monitored the Common Fare program periodically for at least ten years or more. I also reviewed the present procedures, menus and food labels in connection with preparing the affidavit in this case. I reaffirm and incorporate by reference herein my prior affidavit in Salathiel Thompson v. Lantz, 3:04-CV-2084(AWT)(Doc. #143-4) a copy of which is attached.

4. Common Fare provides a completely acceptable menu for Kosher inmates to eat. It is completely permissible for Kosher inmates to eat fish, and all of the other items on the Common Fare menu. It does not substantially burden a Kosher inmate's religion to eat the items on Common Fare because all of the items are permissible. The Common Fare diet does not provide Kosher meat, but it is obviously not totally vegetarian since there is ample provision of fish. The Common fare diet is permissible for Kosher inmates.

5. Part of my duties as consultant to the DOC was to provide for on-going monitoring for compliance with Kosher dietary requirements. I am familiar with the requirements of maintaining a Kosher kitchen, including the requirements of keeping all Kosher items separate and apart from non-Kosher items. This includes separation in storage, handling, preparation and food service. In his CT DOC position as the former

Director of Food Services, Mr. Frank worked with me, regarding Common Fare production and food items for the Connecticut DOC. I have also consulted with the present Director of Food Services, Mr. Michael Bibens.

6. I have reviewed the Common Fare menu and production kitchen and I advised Fr. Bruno, the Director of Religious Services, Mr. Frank, the former Director of Food Services, and Mr. Bibens, the present Director of Foods Services, that the Common Fare Menu as produced here in the Connecticut DOC conforms with Kosher requirements.

7. In my opinion, to a reasonable degree of professional certainty, the Common Fare meals provided by DOC for Kosher inmates are prepared in such a manner as to maintain adequate separations and are in compliance with Kosher dietary requirements.

I have read the foregoing and it is all true and accurate to the best of my knowledge and belief.


Rabbi Robert Schectman

Subscribed and sworn to before me this 19th day of September, 2014.


Commissioner of the Superior Court
Notary Public
My Commission Expires: _____