

# EXHIBIT 6

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

DANIEL GREER	:	CIVIL NO. 3:20-CV-350 (JAM)
	:	
v.	:	
	:	
CONNECTICUT DEPARTMENT	:	
OF CORRECTION, ET AL.	:	MARCH 23, 2020

**DECLARATION OF RABBI DR. SHAUL MARSHALL PRAVER**

I, Rabbi Dr. Shaul Marshall Praver, pursuant to 28 U.S.C. §1246, declare under the pains and penalties of perjury that:

1. I am an ordained rabbi and I am employed by the Connecticut Department of Correction (DOC) as a Jewish Chaplain. I have been a rabbi for approximately 30 years with more than Six years working for the DOC. I provide for religious services to inmates who sign up for Jewish programs and services. I also consult with the Director of Religious Services for DOC with regard to Jewish religious issues such as Kosher dietary requirements. I also consult with and provide advice to the DOC Director of Food Services as well as correctional food services staff, about Kosher requirements and Kosher for Passover requirements for foods and food production. I observe Jewish Kosher dietary law and know what is required to be Kosher for Passover

2. I am familiar with and have personal knowledge of the Department of Correction's Common Fare program, the DOC's Kosher for Passover meals, and Seder plates, which differ from Kosher Common Fare. I am also familiar with the plaintiff, Rabbi Daniel Greer, as I work at Cheshire CI and I have spoken to him on several occasions when I was working at Cheshire CI. I advised him that all food products are completely

kosher including Kosher for Passover food products. I am involved in periodic consultations and monitoring of the Common Fare program in connection with adherence to Kosher dietary requirements, not only with the food items themselves, but the manner and method of food preparation. I have provided my best advice to the Directors of Religious Services and the Chief of Food Services for the DOC regarding how to keep Kosher at Passover, and how the DOC must provide Kosher for Passover meals. They are listening and following my advice.

3. On periodic occasions I visit the DOC production kitchen, review policies, procedures, food labels, and kitchen operations. I speak with the Correctional Food service supervisors, confer with other staff, who join me on my site visit. As a result of these visits, much education, training and improvements take place. The DOC understands the importance of my role and is expanding its program of rabbinical supervision during the years I have been in their employ. The practice of Yotzei V'niknas, which means entering facility kitchens on a random unannounced basis as required under Jewish Kosher Law is increasing in frequency throughout the state facilities. I have reviewed the present procedures, menus and food labels in connection with 2020 Kosher for Passover meal preparation and they are all Kosher for Passover.

4. On March 23, 2020, I inspected the separate food preparation area, in the kitchen at Cheshire CI, in which Kosher for Passover meals will be assembled and I have reviewed all of the menu items on the 2020 Passover menu.

5. All food items on the 2020 Passover menu are Kosher for Passover. An inmate who signs up and chooses to participate in the 2020 Passover meal program will

be eating meals that are entirely consistent with Kosher for Passover dietary law, and would not be forced to choose between following acceptable Jewish Kosher dietary laws and not eating, because both the method of preparation, and the food items themselves are consistent with accepted Kosher for Passover dietary requirements.

6. It does not substantially burden a Kosher inmate's religion to eat the items served by DOC as Kosher for Passover because all the items are permissible and separation procedures are strict. All Passover items are stored separately and prepared in a completely locked and separated area. Extreme precautions are maintained to keep everything separated, including separate individual one-use only Styrofoam containers, disposable utensils, and preparation of such meals is also separated by having rolls of white paper covering all surfaces so that nothing touches any surfaces including the place where the food is stored. The items, e.g. boiled eggs, are pre-boiled and certified Kosher for Passover. I also reviewed and approved all items for the two Seder plates.

7. While I do not disagree with Kosher requirements as set forth in the affidavit of Rabbi Deren, paragraphs 13 and 14, especially with regard to ovens, stoves, pots and pans for cooking and so forth which require a complete "kashering" which would include sanitizing with a blow torch or boiling water, as described in the affidavit of Rabbi Deren, all of that is easily avoided by the DOC Kosher for Passover meals, which do not touch any stove, oven or other surfaces, as they are all ordered specifically to be prepared in advance as Kosher for Passover, and are cold meals, in which every item is permissible and Kosher for Passover.

8. It is for these reasons, described above, and observed by me as I toured the food preparation area and shall do so once again before Passover 2020, that the DOC Kosher for Passover meal program does not in any way force any observant Orthodox Jewish inmate to violate acceptable Kosher for Passover laws. I have respectfully advised Rabbi Greer of all of these facts on several occasions and I have addressed and continue addressing Rabbi Greer's expressed needs and concerns. I understand how upsetting it must be for Rabbi Greer to be away from his family on Passover especially at such an advanced age as Rabbi Greer. I understand that there are holiday customs and conveniences that are not possible while he is incarcerated. However, these aspects stand outside the realm of Kosher for Passover laws and are a different matter entirely. I shall continue to be Rabbi Greer's chaplain advocating for his religious rights and providing him spiritual care to the best of my abilities.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, this 23rd day of March, 23, 2020, I have read the foregoing and it is all true and accurate to the best of my knowledge and belief.

  
Rabbi Dr. Shaul Marshall Praver