

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA :

v. : **CRIM. NO. 14-287-1 (FLW)**

MENDEL EPSTEIN :

AFFIDAVIT OF ALPHONSO LINLEY, M.D.

I, Alphonso Linley, being first duly sworn, hereby depose and state as follows:

1. I am a physician and the Acting Clinical Director at the Federal Correctional Institution, Otisville (“FCI Otisville”), a medium security federal correctional institution with an adjacent minimum security satellite camp (the “Camp”) and a detention center operated by the Federal Bureau of Prisons (“BOP”).
2. On April 14, 2020, Defendant Mendel Epstein presented with a cough and shortness of breath. [Ex. A, Medical Records of Mendel Epstein, pp. 66-67]. He was then transferred to FCI Otisville’s Isolation Unit, which is located in the main facility.
3. While in the Isolation Unit, Defendant was given individualized medical treatment, and tested for COVID-19. [Ex. A. p. 67]. When his condition did not improve, he was sent to the hospital the morning of April 16, 2020. [Ex. A p. 60-65]
4. On April 17, 2020, Defendant’s results came back positive for COVID -19. [Ex. A. p. 54]. While in the hospital, Defendant initially was treated with

supplemental oxygen, which was determined to be unnecessary on April 21, 2020. [Ex. A. p. 45]. He was never placed on a ventilator.

5. Defendant was discharged from the hospital on April 22, 2020. At that time, he was again placed in the Isolation Unit where he was monitored and treated, including having his vital signs tested at least twice a day.

Defendant's condition rapidly improved. Defendant has exhibited no signs of fever or other symptoms since his release from the hospital. His oxygen saturation levels and other vital signs are within normal parameters. [Ex. A P. 1-44].


6. Accordingly, on May 5, 2020, Defendant was released back to the Camp. Although Defendant is a high-risk patient, his present condition is stable, and his medical needs can adequately be addressed by the staff at FCI Otisville.

7. First, the Camp is a suitably clean, germ-free environment for Defendant's recovery. Defendant is currently one of sixty-three Campers living in a space designed to hold approximately one hundred and fifty, and the staff works diligently to insure it is kept clean.

8. Second, Defendant's condition will be carefully monitored by the medical staff. Should Defendant show any symptoms of a relapse of COVID-19, he would immediately either be placed in the Isolation Unit or taken to the hospital for treatment depending on the severity of the symptoms.

I swear that all of the foregoing statements made by me are true to the best of my knowledge. I know that if any of the foregoing statements made by me knowingly are false, I may be subject to punishment.

5/8/2020
Date



Dr. Alphonso Linley, M.D.