



3. Prior to the alleged assaults on January 10, 2020, I regularly communicated with Mr. Kirkland through email, which he was able to access through his tablet. However, after the alleged assaults, all communication was disrupted. Between January 8, 2020, when I last visited with Mr. Kirkland, and January 28, 2020, when I next saw him in court, I emailed Mr. Kirkland three times with information regarding his case. He did not respond to any of my communications.

5. On January 28, 2020, when I next met with Mr. Kirkland at Hamden Superior Court, he reported to me that all his property was removed from his cell after the alleged assaults, including his legal paperwork, his tablet, and the medical brace that he wore on his leg. He appeared in court in prison slippers, and reported these were the only shoes he had been permitted.

6. Mr. Kirkland reported seeing dogs biting prisoners and officers using tasers. He also witnessed officers wearing plastic knuckles and striking inmates. He and all other prisoners were forced to strip down to their underwear and sent to the gym. During this time, all personal property was removed from their cells.

7. All the while that Mr. Kirkland observed the officers assaulting the prisoners, he reports that he was unable to access the law library, had no access to his legal paperwork, and could not communicate with me, his lawyer.

8. As a result of my inability to communicate with Mr. Kirkland, I was unable to prepare additional arguments regarding his appeal that he wished to pursue. This has caused delay in my ability to pursue all legal arguments necessary for his appeal and review of his conviction.

Signed under the pains and penalties of perjury this 9<sup>th</sup> day of February 2020.

/s/ Merritt Schnipper  
Merritt Schnipper, BBO# 676543