

December 24, 2022

Mr. Brian Bush
Hamilton County Sheriff's Office
600 Market Street
Chattanooga, Tennessee 37402
VIA EMAIL: bbush@hcsheiff.gov

Dear Mr. Bush,

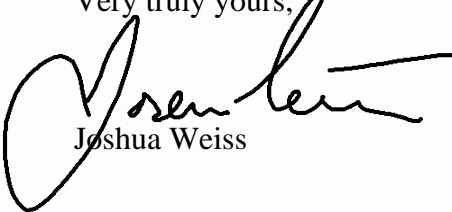
Today December 24, 2022, I went to visit my client Jason Chen, an inmate at the Silverdale Correctional Facility operated by the Hamilton County Sheriff's Office. While I appreciate Captain Knight and Sergeant Poteet's assistance in setting up an attorney visit on short notice and on Christmas Eve Day, what I came to discover is appalling and beyond the acceptable standards of the treatment of inmates.

Mr. Chen was brought out into the attorney client meeting area wearing a short-sleeved red jumpsuit. He was visibly shivering and shaking, and his teeth were chattering hard enough that he could barely speak. As you and every other Chattanooga knows, this is one of the coldest weather temperatures the area has endured in some time. The temperature had dipped to single digit numbers and the wind chill makes it feel as if it were in negative. I asked him why he wasn't wearing a long sleeve shirt, a jacket, or socks! To my surprise, he said they had only given a jumpsuit just to meet with me. In his cell, he is only allowed a t-shirt and underwear to wear. I asked him if his cell is at least warm, and he estimated it to be forty something degrees. He has been given only one thin blanket but no mattress or pad. He said no one will give him any bedding, extra blankets, or warm clothing. He is being denied access to the commissary to buy essential products. During our meeting, I had to request a blanket to wrap around him just so he could speak coherently. The jail staff I saw were wearing multiple layers, jackets, and hats and here is my client, wearing a short-sleeved jumpsuit. This is unacceptable.

If you recall, on December 14, I emailed you and requested that Mr. Chen be allowed to take a shower, which was allowed that same day. That was Mr. Chen's last shower and has been there for almost a month. He has access to a shower, but he is not afforded a soap, shampoo, or a towel. Therefore, if he wants to shower, he must either air dry in freezing cold temperatures or use his clothes or the sole blanket he is given. Again because he is being refused access to the commissary, he also has no access to a toothbrush, toothpaste, or a comb. Mr. Chen has lost about twenty pounds since coming into custody – he does not look good. I addressed these issues with Sergeant Poteet, and he said he would see what he could do. However, I want to ensure that these issues are addressed immediately, and I respectfully implore you to act with urgency.

These conditions go beyond negligence and neglect – they are flagrantly unconstitutional. I am scheduled to see Mr. Chen on Thursday, December 29, 2022. If these concerns are not addressed and rectified by that date, John Cavett and I will not hesitate to file an emergency petition and injunction in federal court. I sincerely hope that is unnecessary. I can only imagine that you are as appalled as I am about these conditions; therefore, I thank you in advance for your assistance in getting this resolved as soon as possible.

Very truly yours,



Joshua Weiss