

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

CHRISTINE M. FINNIGAN,)	
)	
Plaintiff,)	Civil Action No. 1:21-cv-00341
)	
v.)	Hon. Steven C. Seeger
)	Mag. Sheila M. Finnegan
JAMES MENDRICK, in his official)	
capacity as Sheriff of DuPage County;)	
ANTHONY ROMANELLI, in his official)	
capacity as the Chief of the Corrections)	
Bureau of the DuPage County Sheriff's)	
Office,)	
)	
Defendants.)	

DECLARATION OF CHRISTINE FINNIGAN

Pursuant to 28 U.S.C. § 1746, I, Christine Finnigan, declare as follows:

1. I am 53 years old and live in Chicago, Illinois.
2. I am a person in active recovery from opioid use disorder (OUD). If I can't take my methadone while I am in the DuPage County Jail, I am scared for my life.
3. Addiction has ravaged my family. I have four brothers, three of whom passed from heroin overdoses, all at the age of 26. Most recently, my youngest brother's daughter passed on Christmas Eve. She was also 26.
4. I got multiple DUIs in the 1990s because I struggled with drinking. This was a huge wake-up call. I went to an inpatient alcohol rehabilitation center and stopped drinking alcohol for the next sixteen years.
5. However, just before I entered treatment for alcoholism, I was prescribed Vicodin in 1998 after a car accident. I also was prescribed Tylenol #3, an opioid pain reliever, from a dentist for dental pain. Over the next four to five years, I found myself taking more Vicodin just

to be able to function. I couldn't even get out of bed without taking Vicodin. I realized then that I had an addiction to opioids.

6. My addiction prevented me from thinking clearly, maintaining good relationships with my family, concentrating, and taking care of myself. I tried to come off of Vicodin five times, but I couldn't. The withdrawals were too much.

7. My life changed for the better around 2002, when I decided to get treatment for my addiction and was prescribed Suboxone by a physician. I took prescribed Suboxone for over ten years. With Suboxone treatment, I was able to raise my four kids, as well as have custody of two of my nephews. I also held a job for many years managing a club in Stone Park, Illinois. In 2011, I opened my own nail salon.

8. My mother passed away in 2012. I became very depressed.

9. A year or two later, I stopped taking Suboxone cold turkey because it was becoming harder to get a prescription for it and the cost was rising. During withdrawal, I was constantly craving drugs. I was always sick and I never felt right. I had insomnia, severe body aches so that I never felt comfortable, and overwhelming anxiety. I got things done, but I was nowhere near the person I had been when I was taking Suboxone. I felt like I had to force myself just to function.

10. After stopping Suboxone, my life started to go in a tail spin. During this time, I lost my job, my salon, my home, my mind, and the progress I made in my recovery. During this period, I started drinking again – after having stopped for 16 years.

11. I also developed a seizure disorder and always felt shaky.

12. In 2016, I was arrested for charges including a DUI, which is why I face time in jail today. I have been working to make my life better since then, by regaining my recovery,

repairing relationships with my family, working, and making sure I do not get into trouble again. I take full responsibility for my actions, and on January 28, 2021, I pled guilty to this offense. I will report to the DuPage County Jail on February 25, 2021. Documentation of my disposition is attached as **Exhibit 1**.

13. In August 2019, a co-worker introduced me to a methadone clinic, the Bobby Buonauro Clinic. I was open to going to the clinic because my only surviving brother, age 62, has been on methadone for 12 years. He spent most of his adult life in prison, but methadone turned his life around. He has gotten married, adopted a disabled boy, has his own company, and is involved with his church.

14. In August 2019, my physician at the Bobby Buonauro Clinic diagnosed me with OUD and prescribed medication for addiction treatment (MAT) with methadone. I am in active recovery from my OUD.

15. I am terrified that if I am unable to remain on my methadone during my time at the DuPage County Jail, I will not be able to control my addiction, and I will relapse, overdose, and die. I am also worried about my seizure disorder coming back if I am not on methadone.

16. Since starting methadone in August 2019, I can think more clearly, take care of myself, and pay my bills. I am not currently using illegal drugs. I finally feel like myself again. I have no cravings whatsoever. Methadone works better for me than Suboxone did.

17. I work on my recovery every day and know that I have to fight to stay in recovery. I even have my own small online recovery group.

18. My son drives me to the Bobby Buonauro clinic twice a month so that I can pick up my methadone. I take methadone every day. I may take methadone for years, possibly even for the rest of my life, so that I can maintain my recovery.

19. I am scared that if the DuPage County Jail doesn't let me stay on methadone, I might die. The last time I wasn't able to stay on my MAT, my life spun completely out of control. I don't know if I can do that again.

20. In 2004, my brother had to go through detox in the DuPage County Jail.

21. In early January 2021, before this lawsuit began, I even had a conversation on Facebook Messenger with Sheriff Mendrick by contacting him on his personal Facebook page. Sheriff Mendrick talked about a whole array of programs the jail has, but never said that MAT was available. He said that they "do full detox" and "are working on getting the one month shot (suspended solution) of buprenorphine." He did not mention any program that provided current access to methadone or buprenorphine. Documentation of this conversation is attached as **Exhibit 2.**

22. I asked Sheriff Mendrick "I'm curious as to the protocol if someone where [sic] to come in and are on a MAT program. Do they just stop them cold turkey?" Sheriff Mendrick never responded to this question. **Exhibit 2.**

23. I am willing to go to the jail for a physical evaluation before my report date if necessary, so that the jail medical staff can determine that methadone is medically appropriate for my OUD and avoid interruption of my treatment.

24. I am horrified at the thought of going through detox. I honestly don't know if I can. The prospect of this feels like a panic attack that never ends. My mind is always racing about what is going to happen. It is like an impending feeling of doom that never goes away. I don't want to feel the way I did when I went off of Suboxone cold turkey—craving opioids and feeling sick all the time, never being able to sleep, having horrible body aches, and constant anxiety.

25. I read about Paul Lamoureux, a young man who was denied his Suboxone at the DuPage County Jail and died of an overdose shortly after his release from the DuPage County Jail. I am afraid that would happen to me.

26. I recognize the wrong things that I have done in my life, especially my DUIs. My recovery is so important to me, not only because it helps stabilize my life, but because it makes me a more responsible person and member of my community. I am not trying to get out of my sentence. I just want to have access to the medication that saved my life. I do not want my jail sentence to reverse the hard-won progress I have made in my recovery and I do not want it to kill me.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed February 4, 2021

/s/ Christine Finnigan

Christine Finnigan