

COMMONWEALTH OF MASSACHUSETTS
SUFFOLK SUPERIOR COURT

MITCHELL MATORIN, and
LINDA SMITH

Plaintiffs,

v.

COMMONWEALTH OF
MASSACHUSETTS, and its EXECUTIVE
OFFICE OF HOUSING & ECONOMIC
DEVELOPMENT,

Defendants

Civil Action No. 2084-CV-01344

AFFIDAVIT OF MEGAN SANDEL

I, Megan Sandel, hereby declare as follows:

1. I am over the age of 18 and am otherwise capable of making this Affidavit. I make this declaration based on my personal knowledge except where I have indicated otherwise.

2. I am currently a physician at Boston Medical Center, where I focus on children's health as part of a world-class pediatrics department. BMC serves a disproportionate share of indigent children and over 70% of our patients are either without health insurance or on Mass Health.

3. I have been a pediatrician for 21 years, graduating from the Boston Combined Residency Program in Pediatrics at Boston Medical Center and Boston Children's Hospital in 1999. In addition to my work as a doctor, I serve on the following community boards: Health Resources in Action, Citizen's Housing and Planning Association, Asthma Regional Council of New England, and the Massachusetts Chapter of the American Academy of Pediatrics.

4. I witness daily the impact of poverty on health; nothing does more damage than the lack of a safe, reliable place to live.

5. In addition to the byproducts of homelessness, such as inadequate nutrition and poor environmental controls, the very fact of insecurity around where to sleep at night leads to greater rates of illness and greater severity of illness when it occurs.

6. The COVID-19 pandemic makes these impacts even more extreme. To keep the virus from spreading, households need to have private space to dine, sleep and interact with each other without non-household members sharing the physical environment. This cannot happen in congregate settings such as shelters and nursing homes, and certainly not on the streets without shelter.

7. Homeless families and individuals tend to have poor access to regular health care and thus rely on emergency rooms for care at the very time when we should not have non-infected people entering ERs—both because the risk of their becoming infected is great and because all emergency health personnel are needed to treat COVID-19 cases.

8. Low-income households have few or no resources to weather a financial storm. COVID-19 has created such a storm and has left many without funds to pay both rent and food bills.

9. Preserving these tenancies is in the public interest by keeping people out of shelters and emergency rooms. Stable housing is absolutely essential to assure the health of individuals and to protect the public health. An eviction moratorium is the only way to achieve this with the speed necessary to effectively combat the spread of COVID-19.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on this 24 the day of July, 2020.

Madel

Megan Sandel