



The Commonwealth of Massachusetts

County of Plymouth

Sheriff's Department

Plymouth County Correctional Facility

26 Long Pond Road

Plymouth, MA 02360

Telephone: (508) 830-6200

Fax: (508) 830-6201

www.pcsdma.org



Joseph D. McDonald, Jr.
Sheriff

Gerald C. Pudolsky
Special Sheriff

Accredited by:



American Correctional Association

September 9, 2021

Mario N. Parades
Prisoners' Legal Services
50 Federal Street
4th Floor
Boston, MA 02110

Krista Oehlke
ACLU of Massachusetts
211 Congress Street
Boston, Ma 02110

RE: Public Records Request

Dear Ms. Oehlke and Mr. Parades:

I am in receipt of your 7 page letter dated September 2, 2021. We have denied your request for a fee waiver. Please send payment to the Plymouth County Sheriff's Department for the amount of \$425 and once received, we will begin the work of locating, segregating and redacting those records which I indicated in my August 18th letter were responsive.

With regard to your requests 4 and 5, I had provided months of data regarding testing and vaccinations at our facility, at no cost, and I explained that should you want to maintain your request as written, asking us to provided that data specifically for ICE detainees, we would need to undertake the significant task of reviewing all of the testing and vaccinations done at this facility and individually looking up each inmate to determine their custody status. We have administered well over 1,000 tests since July 1st. We estimate that to have our staff look up each of these tests to provide you with the details you are requesting will take approximately 80 hours of work. If you would like our staff to begin this task to provide these records, please submit payment of \$2,000 and we will begin that work once received. If you would like to discuss other ways to narrow your request, I am happy to speak with you further.

To the extent that some of this response is a denial of your request, under G.L. c. 66, you have the right of appeal to the supervisor of records under subsection (a) of section 10A and the right to seek judicial review of an unfavorable decision by commencing a civil action in the superior court under subsection (c) of section 10A.

Sincerely,

/s/ Jessica L. Kenny

Jessica L. Kenny
Deputy General Counsel
Plymouth County Sheriff's Department
24 Long Pond Road
Plymouth, Ma 02360
direct: 508-732-1867
jkenny@pcsdma.org

ABINGTON BRIDGEWATER BROCKTON CARVER DUXBURY EAST BRIDGEWATER HALIFAX HANOVER HANSON HINGHAM
HULL KINGSTON LAKEVILLE MARION MARSHFIELD MATTAPOISETT MIDDLEBOROUGH NORWELL PEMBROKE PLYMOUTH
PLYMPTON ROCHESTER ROCKLAND SCITUATE WAREHAM WEST BRIDGEWATER WHITMAN