

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

SEAN SWAIN,	:	Case No. 4:14-cv-2074
Plaintiff,	:	Judge Benita Y. Pearson
v.	:	
GARY C. MOHR, <i>et al.</i> ,	:	
Defendants.	:	

AFFIDAVIT OF AMANDA MOON-THOMAS

STATE OF OHIO)
) ss
COUNTY OF UNION)

Now comes Amanda Moon-Thomas, having been first duly cautioned, and states and affirms as follows:

1. My name is Amanda Moon-Thomas.
2. I have personal knowledge of the facts in this affidavit.
3. I am competent to testify about these facts.
4. I am employed by the Ohio Department of Rehabilitation and Correction ("ODRC") as the Program Administrator III. I have been employed as the Program Administrator III for 7 months. I have been employed by ODRC for 18 years.
5. My duties as the Program Administrator III are to assist the Managing Director of Operations, who is in charge of all prison and Adult Parole Authority field operations. I work on special projects for the Managing Director of Operations, including handling the operational aspects of JPay.

6. JPay kiosks are located at the Institutions. These JPay kiosks allow inmates to interact with family and friends outside the Institutions by use of electronic mail, and recently, Video Visitation. More recently, ODRC allowed JPAY to briefly offer VideoGrams through their kiosks.
7. Video Visitation consists of pre-arranged and approved live video conference between inmate and approved visitor, typically 30 to 60 minutes in length. A description of the JPay video visitation program is attached hereto as Exhibit A.
8. Video Visitation is offered to inmates at ODRC on an individual, case-by-case visit, at the discretion of each Warden of the ODRC Institution, or the Warden's designee.
9. JPay has not suspended the Video Visitation at ODRC Institutions. JPay did not announce that Video Visitation was suspended for ODRC.
10. The JPay VideoGram program consists of the creation or recording of a 30 second video clip by an inmate, or by a family member or friend. The VideoGram is then viewed by the inmate at a kiosk, or by the person on the outside using the JPay software. A description of the JPay VideoGram program is attached hereto as Exhibit B.
11. A VideoGram JPay pilot program was implemented at the Lebanon Correctional Institution ("LECI") in order to determine whether the VideoGram JPay program would be implemented statewide.
12. JPay agreed to develop a screen to catch security violations before the program was implemented statewide.
13. The VideoGram JPay program was implemented statewide on February 12, 2012, but because some of the Institutions were unable to review the quality assurance program to

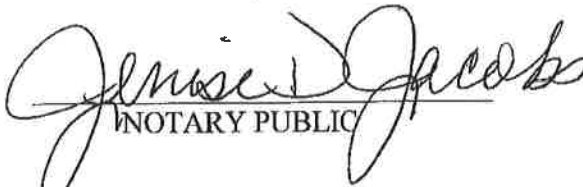
ensure the security screening was adequate, the VideoGram JPay program was placed on hold until the Institutions were satisfied that the security screening was adequate.

14. Some of the previously-paid-for VideoGrams were screened by the Institutions and sent.

FURTHER AFFIANT SAYETH NAUGHT.


AMANDA MOON-THOMAS

Sworn to me and signed in my presence this 2 day of March 2015.


NOTARY PUBLIC

My commission expires:

1-7-20