



AFFIDAVIT OF MICHAEL D. FREEMAN Med.Dr., Ph.D., MScFMS, MPH, MFFLM

NOW COMES, Dr. Michael D. Freeman, who after being duly sworn, deposes and states under oath as follows:

1. I have been asked to provide an analysis regarding whether incarcerating Mr. Jussie Smollett in an Illinois jail or prison poses a potentially deadly risk to his health from an epidemiological and medical perspective.
2. It is my opinion that the incarceration of Mr. Smollett, in jail or prison, poses a substantially increased risk to his health.
3. The **COVID-19 pandemic**, also known as the **coronavirus pandemic**, is an ongoing global pandemic of coronavirus disease 2019 (COVID-19) caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).
4. As of 6 March 2022, the pandemic had caused more than 445 million cases and approximately 6 million deaths worldwide, making it the deadliest pandemic in recent history.
5. Prisons and jails all around the United States of America, including Illinois, have been particularly hit with the Covid pandemic at every wave of the pandemic.
6. Incarceration in a jail or prison setting poses a heightened danger to Mr. Smollett's health when taking his current health status, including compromised immunity, into account.
7. My qualifications to render the opinions described herein are as follows:
8. I am a doctor of medicine and an epidemiologist, and my field of expertise is forensic medicine and forensic epidemiology. I hold a doctor of medicine degree (Med.Dr.) from Umeå University (Sweden), a (Ph.D.) in epidemiology in epidemiology from Oregon State University, a master of forensic medical sciences (MScFMS) from the University of Verona and the Academy of Forensic Medical Sciences (UK), and a master of public health (MPH) in epidemiology and biostatistics, also from Oregon State University, *inter alia*. I have completed a 2-year postdoctoral fellowship in forensic pathology at Umeå University in Sweden, and am a member of the Faculty of Forensic and Legal Medicine (FFLM) of the Royal College of Physicians (UK), equivalent to board certification in forensic medicine. I am a fellow of the American College of Epidemiology (ACE) and the American Academy of Forensic Sciences (AAFS). I am a US Fulbright fellow, having held a 3-year

appointment as a Fulbright Specialist in the field of Forensic Medicine with the U.S. Department of State (2017-20).

9. I serve as a tenured Associate Professor of Forensic Medicine and Epidemiology at Maastricht University (NL), and a Clinical Professor of Psychiatry at Oregon Health and Science University (OHSU) School of Medicine. I have taught at these institutions for the past 24 years in forensic medicine and epidemiology. I currently serve or have served as an associate editor or editorial board member of 13 peer reviewed scientific journals, and have published approximately 220 scientific papers, abstracts, book chapters and books on topics largely related to scientific methods of causal evaluation. I have provided testimony in more than 400 civil and criminal trials in state and Federal court throughout the United States, Canada, Australia, and Europe. Please see my CV for further details.

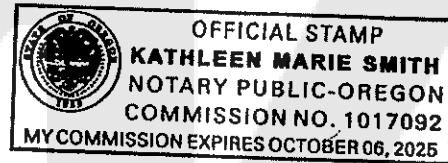
*FURTHER AFFIANT SAYETH NOT.*



Michael D. Freeman Med.Dr., Ph.D., MScFMS, MPH, MFFLM

Sworn to and subscribed before me  
this 7<sup>th</sup> day of MARCH, 2022.

  
NOTARY PUBLIC



My Commission Expires: 10.06.2025