

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

DECLARATION OF MOHAMMED QAISI, DMD, MD

I, Mohammed Qaisi, DMD, MD, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, and if called upon to testify at trial, hearing, or deposition would state, based upon my personal knowledge, the following:

1. I am the Residency Program Director for the Oral and Maxillofacial Surgery (“OMFS”) outpatient clinic at the John H. Stroger, Jr. Hospital of Cook County (“Stroger”), which operates under Cook County Health (“CCH”), an agency of Cook County. I have served in this capacity since approximately the end of 2016.

2. I am also an attending physician at Stroger OMFS and have been in this position since approximately February 2016. As an attending physician, I both supervise residents and provide care to patients at Stroger OMFS.

3. Currently, there are three full-time attending physicians, one part-time attending physician, and ten residents employed at Stroger OMFS. This has been the approximate level of staffing since I have been an attending physician at Stroger OMFS. Attending physicians and residents provide care to patients during normal business hours in the outpatient setting.

Additionally, attending physicians and residents provide call coverage for the Stroger Emergency Department and treat detainees there, as needed, for emergencies.

4. A detainee who is referred to Stroger OMFS from Cermak Health Services (“Cermak”), the CCH operating unit that provides healthcare to Cook County Jail (“Jail”) detainees, can be seen and treated by any attending or resident.

5. Over the past four years, I have supervised non-emergency extractions on dozens of Jail detainees who are referred to Stroger OMFS. Of these detainees, I do not recall seeing any detainee where I believed the detainee’s dental condition was such that it required treatment sooner than the scheduled appointment date or was negatively impacted in any way.

6. For extractions deemed routine by a Cermak dentist, a referral order is placed into Cerner, the electronic medical records system used by CCH. Routine referrals for oral surgery are scheduled based on the next available date. Scheduling detainees the next available date for routine oral surgery is appropriate, as these detainees have been evaluated by a Cermak dentist and do not need to be prioritized based on urgency.

7. If a detainee needs an expedited appointment because of an urgent dental condition, Cermak dental staff has the ability to prioritize and escalate referrals to Stroger OMFS. In my experience, there have been numerous times where additional detainees were sent on a “walk-in basis” to Stroger OMFS due to this prioritization process.

8. If a detainee needs emergency care as determined by Cermak staff, the detainee may be sent to the Emergency Department at Stroger for care. I have personally been involved in the care of such detainees.

9. Detainees who are referred to Stroger OMFS by a Cermak dentist for extractions are generally seen and treated the same day regardless of the complexity or number of teeth

extracted. In contrast, members of the general public who require complex or multiple extractions are generally seen for an initial consultation and then scheduled a future appointment, which could be ninety days out.

10. Members of the general public generally can be seen at Stroger OMFS in one of two ways: by a referral from a dentist or by calling a designated phone number with a limited number of slots. This phone line is open on a first come, first served basis, Tuesday through Friday, until the limited number of available slots are filled. As stated above, the initial appointment is usually a consultation appointment. Thus, based on this, Jail detainees have more reliable access to oral surgery at Stroger OMFS than members of the general public.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 4, 2020

By: 
Mohammed Qaisi, DMD, MD