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RECEIVED

Nov 21 2022

SC Court of Appeals

To: The Honorable Jenney Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: The State vs. Brittany V. Martin 2022-001444 STATUS UPDATE

DATE: November 21, 2022

Dear Ms. Kitchings,

Ms. Martin delivered her child on Friday, and she was returned to the Camile Graham detention today.

There was no opportunity provided for her child to bond with her nor obtain sufficient breast milk.

Please see the affidavit attached. Please add this item and status update to the appeal file.

Sincerely,

Dr. Sybil Dione Rosado, Esq.

Cc: William Blitch via electronic mail.

Appeal from the Sumpter County
Honorable R. Kirk Griffin, Circuit Court Judge
Appellate Case No. 2022-001444

THE STATE,

Respondent,

v.

BRITTANY V. MARTIN,

Appellant.

AFFIDAVIT

Personally appeared before me, Keoshia Gaines, who being duly sworn, attests to the following:

I.

I am Keoshia Gaines and I am a Doula and Executive Director at the Lotus Alliance. The Lotus Alliance is a non-profit agency that is committed to providing compassionate support for birthing people housed by the South Carolina Department of Corrections. Through evidence-based educational sessions, emotional and physical labor support, postpartum community groups, and legislative advocacy. Our goal is to improve birth outcomes and postpartum wellness for our program's mothers and their babies.

II.

Through my position, I am aware of the overwhelming scientific evidence that breastfeeding is critical for the establishment of a positive parental infant bond and preventing numerous mental and physical health issues for both the baby and mother.

III.

Documented research based scientific evidence indicates that breastfed babies are also less likely to have ear infections, stomach bugs, a lower risk of asthma, obesity, type 1 diabetes, and sudden infant death syndrome (SIDS). Sudden infant death syndrome (SIDS) is the sudden and unexplained death of a baby younger than 1 year old. SIDS is sometimes called crib death. This is because the death may happen when the baby is sleeping in a crib. SIDS is one of the leading causes of death in babies from ages 1 month to 1 year. It happens most often between 2 and 4 months old. For reasons that aren't well-understood, nonwhite infants are more likely to develop SIDS. Breast-feeding for at least six months lowers the risk of SIDS.

IV.

Ms. Martin's son, Donnell Simmons, died on 1-1-08 of (SIDS) at the age of four months.

V.

Babies who've had siblings or cousins die of SIDS are at higher risk of SIDS.

VI.

I believe that preventing Ms. Martin from breastfeeding her child for at least six months will unjustifiably increase the child's risk of death from SIDS and put Ms. Martin at risk for severe postpartum depression and anxiety.

VII.

WHEREFORE, the undersigned hereby certifies that the above is true to the best of her knowledge and recollection.

Keoshia Gaines
Keoshia Gaines Doula and Executive
Director, The Lotus Alliance

SWORN to before me this 20th day of November 2022.

Dr. Sybil Rosado
Notary Public for South Carolina

My Commission Expires 6/24/24
