

**UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF WISCONSIN**

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**J.T.**, by and through his next friend,  
Sakeena Jackson, for themselves and all  
others similarly situated, N.L., and L.G.

Plaintiffs,

v.

Case No.: 17-CV-47

**JON E. LITSCHER**, in his official capacity  
as Secretary of the Wisconsin Department  
of Corrections, et al.,

Defendants.

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**DECLARATION OF TERESA ABREU**

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STATE OF ILLINOIS                    )  
  ) SS.  
COOK COUNTY                         )

I, TERESA ABREU, pursuant to 28 U.S.C. § 1746, declare and state, under penalty of perjury, as follows:

1. I am a Monitor, duly assigned in the above captioned case to assess compliance with the Consent Decree, implement recommendations in the February 2018 technical assistance report, as well as comment on any observations and/or updates during my routine site visits to the Defendants.
2. On July 24 and 25, 2025, I completed my twenty-third site visit.
3. Following that visit, I authored a report, which was filed with the Court on October 2, 2025. (Dkt. 163). In that report, I indicated that the Defendants achieved substantial compliance with all provisions of the Agreement.
4. On November 21, 2025, I completed my twenty-fourth site visit.
5. Following the visit, I authored a report, which was filed with the Court on January 28, 2026. (Dkt. 164). In that report, I indicated that the Defendants achieved substantial compliance with all provisions of the Agreement.

6. This accomplishment reflects years of deliberate and meaningful reform, including the elimination of OC spray, the removal of punitive room confinement, the reduction of restraint usage and confinement in general, the implementation of a robust behavior management system and programming, efforts to reduce idleness, and a strong emphasis on staff wellness. These measures have produced a demonstrable improvement in the safety, climate, and culture of the facilities.
7. Per the Consent Decree, the Court shall grant a motion and the Agreement shall terminate and all claims shall be dismissed if the Administrative Code has been amended to codify certain material terms of the Consent Decree and the Monitor has certified, in two consecutive inspections of each operational Type I juvenile correctional facility, that such facilities are operating in compliance with sections III.A, B, C, and D of the Consent Decree. (See Dkt. 107, at 10).
8. The above results constitute two consecutive reporting periods in which I hereby certify that the Defendants have achieved substantial compliance with all provisions of the Consent Decree.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 28<sup>th</sup> day of January, 2026.

BY: s/ Teresa Abreu  
TERESA ABREU