

EXHIBIT 1

**IN THE CHANCERY COURT FOR THE STATE OF TENNESSEE
TWENTIETH JUDICIAL DISTRICT, DAVIDSON COUNTY**

KEVIN BURNS, et al.,)	
)	
Plaintiffs,)	
)	
v.)	<u>CAPITAL CASE</u>
)	
FRANK STRADA, et al.,)	No. 25-0414-IV
)	
Defendants.)	CHANCELLOR PERKINS

DECLARATION OF JILLIAN BRESNAHAN

I, Jillian Bresnahan, under Tennessee Rule of Civil Procedure 72, make the following Declaration under penalty of perjury, and declare and state as follows:

1. I am over the age of eighteen and have personal knowledge of the information contained in this Declaration.
2. I am a licensed physician assistant. I obtained my Doctor of Business Administration in December of 2019 from North Central University. I currently serve as Assistant Commissioner of Clinical Services for the Tennessee Department of Correction (TDOC).
3. In my current position, among other duties and responsibilities, I oversee the delivery of medical services for a population of over 20,000 offenders in TDOC's custody.
4. TDOC provides medical care through contracted medical providers. Each TDOC facility includes an institutional infirmary for clinically appropriate treatment. When care must be delivered outside the institution, offenders are transported to hospitals or other third-party providers. These third-party providers do not practice within TDOC facilities and are not contractually obligated to do so.

5. I am aware that offender Byron Black underwent the implantation of a Cardiac Implantable Electronic Device (CIED) in May 2024 at Nashville General Hospital. Ongoing care for Mr. Black's CIED is managed by providers at that facility.

6. I am aware of the legal proceedings in which Mr. Black's legal team has requested the CIED be turned off or deactivated via the interrogation method by a qualified clinician. I inquired with Nashville General Hospital about the ability to turn off the CIED at Mr. Black's request at his execution on August 5, 2025. I was informed that the third-party providers at Nashville General Hospital are willing to deactivate the CIED at the hospital on August 4, 2025. They will not, however, come to the prison and turn off the device at his execution.

7. I am aware of the court's recent order requiring TDOC to have the necessary medical or certified technical professional present, along with any necessary equipment, at Mr. Black's execution to deprogram and deactivate his CIED. TDOC cannot comply with this requirement. TDOC has no authority to compel third-party providers to render care within its facilities, nor does it employ any staff or possess any equipment capable of deactivating the device.

8. Since the court's recent order, I contacted Mr. Black's third-party medical providers to ask whether they would voluntarily attend the execution to deactivate the CIED. They have declined.

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

Executed this 21 July 2025.

/s/ 
JILLIAN BRESNAHAN, DBA
Assistant Commissioner, Clinical Services