

Declarations of Incarcerated Persons in Support of Plaintiffs' Motion for An Order
to Show Cause re: Contempt

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Exhibit 1

Declaration of Alberto Aguilera

I, Alberto Aguilera, declare the following:

1. I am making this declaration based on my personal experiences and if called to testify, I am willing and able to do competently testify the following:
2. I am in cell 206 in the IRC.
3. I have been here for more than 12 hours. I arrived on Monday.
4. Prior to being here, I was in a supermax for approximately 2 weeks.
5. Prior to supermax I was here at the IRC. They keep moving me around.
6. It is very cold in this cell. They have not provided us with anything to sleep – such as a pillow or a blanket.
7. They did not provide toilet paper until the ACLU representatives said something about it.
8. I just want a place to sleep. I have not been told when they will provide me with a bed.
9. My booking number is: 6476266.
10. Today is Wednesday, October 19, 2022. It is 1pm.
11. I am desperate to see my family. I want to leave.
12. I was interviewed by ACLU representative, Marisol Dominguez-Ruiz, while I was held in cell 206 at IRC on October 19, 2022. She interviewed me in Spanish, wrote the declaration on my behalf and reviewed the content prior to my signing of it.

I declare under the penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this day 19 day of Oct., 2022 in Los Angeles, California.

I, Marisol Dominguez-Ruiz, interviewed Mr. Aguilera in the IRC on October 19, 2022, took notes and then wrote up his declaration in Spanish, which is attached. I read Mr. Aguilera the declaration, he approved its contents and signed it. I translated and have reviewed the word-processed version of this declaration and declare that it accurately reflects the content of the handwritten, signed version. I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed February 25, 2023, in Los Angeles, California.

A handwritten signature in black ink, appearing to read 'Marisol Dominguez-Ruiz', with a stylized, cursive script.

Marisol Dominguez-Ruiz

La Declaración De Alberto Aguilera

1 Yo, Alberto Aguilera, declaro lo siguiente:

- 2 1. Yo hago esta declaración basado de mi propia experiencia
- 3 y si me llaman a testificar yo puedo hacerlo y lo haría con
- 4 competencia lo siguiente:
- 5 2. Yo estoy en la celda 206 de IRC.
- 6 3. He estado aquí por mas de 12 horas. Llegue el lunes.
- 7 4. Antes de llegar aquí estaba en Supermax por aproximadamente
- 8 2 semanas.
- 9 5. Antes de Supermax estaba aquí en IRC. Me siguen
- 10 moviendo.
- 11 6. Hace mucho frío en esta celda. No nos dan algo para
- 12 dormir. - una almohada o cobija.
- 13 7. No nos dieron papel de Baño hasta que las representantes
- 14 de ACLU dijeron algo.
- 15 8. Yo nomas quiero un lugar para dormir. No me han
- 16 dicho cuando me van a dar una cama.
- 17 9. Mi numero de Booking es: 6476260
- 18 10. Hoy es miercoles, 19 de Octubre del 2022. Son las 1pm.
- 19 11. Me siento desesperado por ver a mi familia. Tengo ganas
- 20 de salir.
- 21 12. Representantes del ACLU, Marisol Domínguez-Ruiz, me entrevistó
- 22 en la celda 206 del IRC el 19 de Octubre del 2022. Ella
- 23 me entrevistó en español y escribió esta declaración por mi
- 24 parte y repaso todo los contenidos antes de que yo firmara.

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 19 day of Oct, 2022 in Los Angeles, California.

Printed name: ALBERIO

Exhibit 2

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Declaration of Darryl Beck 6550731

I, Darryl Beck, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. I was arrested last Thursday and taken to a jail in Encino. I stayed in the Encino jail in a single cell until Tuesday. I did not get any showers there.

3. I went to court on Tuesday, and the court set a high bail. From court they transported me to IRC.

4. I got into the IRC around 8 pm. I gave them my clothes and then took a shower with a group of 40 men. I was in the shower for 45 minutes to a hour. There was no soap in the shower.

5. After the shower I went to the area with chairs and TVs. It was at around the time of shift change.

6. I did not sleep that night. There are no beds. I laid down on the floor in the cage area.

7. Sometime during the night two guys got into a fight and fell on top of the bench I was trying to sleep under. They stepped on my feet. I was using my shoes as a pillow, so it hurt more since they fell on my cold bare feet.

8. I saw a medical provider on Wednesday night. I don't have any medical needs.

9. I asked to see a psych or mental health provider due to the circumstance I was in.

10. At 1 am I was interviewed by mental health. I told him that I don't need meds.

11. On the floor around the toilet in the IRC there was pee and feces and trash and toilet paper.

12. I never felt like I have enough to eat. I got two slices of bread with a peanut butter pack and a jelly pack, 2 cookies, and orange juice. It was the same

1 meal except for dinner, you get a burrito.

2 13. At around 2:30 am they moved a group of about 40 to the holding area
3 I am in now.

4 14. In this room I have a foam mattress, no cover, no pillow, no sheet, and
5 one blanket.

6 15. It's always cold here.

7 16. I do not have a toothpaste or toothbrush. There is a small bar of soap.

8 17. The toilet works and there is a water fountain on top of it.

9 18. There is a shower, but it's completely open. I don't have a towel, and
10 it's cold, and I share this cell with many people and am scared of getting athlete's
11 foot or gangrene or staph infection.

12 19. There is a phone that works and one phone does not.

13 20. I was told this is temporary housing.

14 21. The TV in the wall is brand new and stuck on advertisements like
15 Walmart.

16 22. No one has come by to pick up trash. We made a trash bag out of the
17 large food bags. When it's full we give them to the trustees.

18 23. I feel like I'm losing it. I'm afraid of losing my jobs if I don't get out
19 soon and my apartment.

20 24. The vents in the ceiling are covered with plastic. A group before us
21 must have used spoons to stick the plastic over the vent. I leave it that way because
22 it's cold in here.

23 25. I also feel sorry for the circumstances I am in and wish I could have
24 met you, judge, in a different platform.

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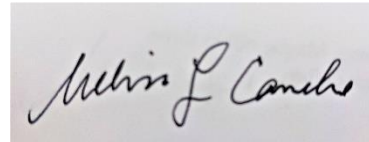
26 I declare under penalty of perjury of the laws of the State of California and
27 the United States that the foregoing is true and correct. Executed this 16th day of
28 February, 2023, in Los Angeles, California.

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Darryl Beck

I, Melissa Camacho, interviewed Mr. Beck in Men’s Central Jail 6050 on February 16, 2023, took notes and then wrote up his declaration, which is attached. I read Mr. Beck the declaration, he approved its contents and signed it. I have reviewed this word-processed version of this declaration and declare that it accurately reflects the content of the handwritten, signed version.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed February 24, 2023, in Los Angeles, California.

A rectangular box containing a handwritten signature in cursive script that reads "Melissa Camacho".

Melissa Camacho

1 Declaration of Darryl Beck 6550731

2 I, Darryl Beck, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I was arrested last Thursday and taken to
6 a jail in Encino. I stayed in the Encino jail in a
7 single cell until Tuesday. I did not get any
8 showers there.

9 3. I went to court on Tuesday, and the court set
10 a high bail. From court they transported
11 me to IRC.

12 4. I got into the IRC around 8 pm. I gave them ^{DS}
13 my clothes and then took a shower with a group ^{of 40 men}. I was
14 in the shower ~~area~~ for 45 minutes to a hour.
15 There was no soap in the shower.

16 5. After the shower ~~we were waiting for~~
17 ~~a group of about 45.~~ I went to the area with chairs
18 and TVs. It was at around the time of shift change.

19 6. I did not sleep that night. There are no beds.
20 I laid down on the floor in the cage area.

21 7. Sometime during the night 4 or 5 guys got into a
22 fight and fell on top of the bench I was trying to
23 sleep under. They stepped on my feet. I was using
24 my shoes as a pillow, so it hurt more since they
25 fell on my cold ^{bare} feet. ^{DS}

26 8. I saw a medical provider on Wednesday night.
27 I don't have any medical needs.

28 9. I asked to see a psych or mental health

1 provider due to the circumstance I was in.

2 10. At 1 am I was interviewed by mental health.

3 I told him that I don't need meds.

4 11. ~~On~~ On the floor around the toilet ^{in the IRC} there was

5 pee and feces and trash and toilet paper.

6 12. I never felt like I had enough to eat.

7 I got two slices of bread with a peanut butter pack and

8 a jelly pack, 2 cookies, and orange juice. It was the

9 same meal except for dinner, you get a burrito.

10 18. At around 2:30 am they moved a group of about

11 40 to the holding area I am in now.

12 19. In this room I have a foam mattress, no cover, no

13 pillow, no sheet, and one blanket.

14 20. It's always cold here.

15 21. I do not have toothpaste or toothbrush. There is a small

16 bar of soap.

17 22. The toilet works and there is a water fountain top of it.

18 23. There is a shower, but it's completely open, I don't have a

19 towel, and it's cold, and I share this cell with many people

20 and am scared of getting athlete's foot or gangrene or staff infection.

21 24. There is a phone that works and one phone does not.

22 25. I was told this is temporary housing.

23 26. The TV in the hall is brand new and stuck a

24 advertisements like Walmart.

25 27. No one has come by to pick up trash. We made a

26 trash bag out of the large food bags. When it's full we

27 give them to the trustees.

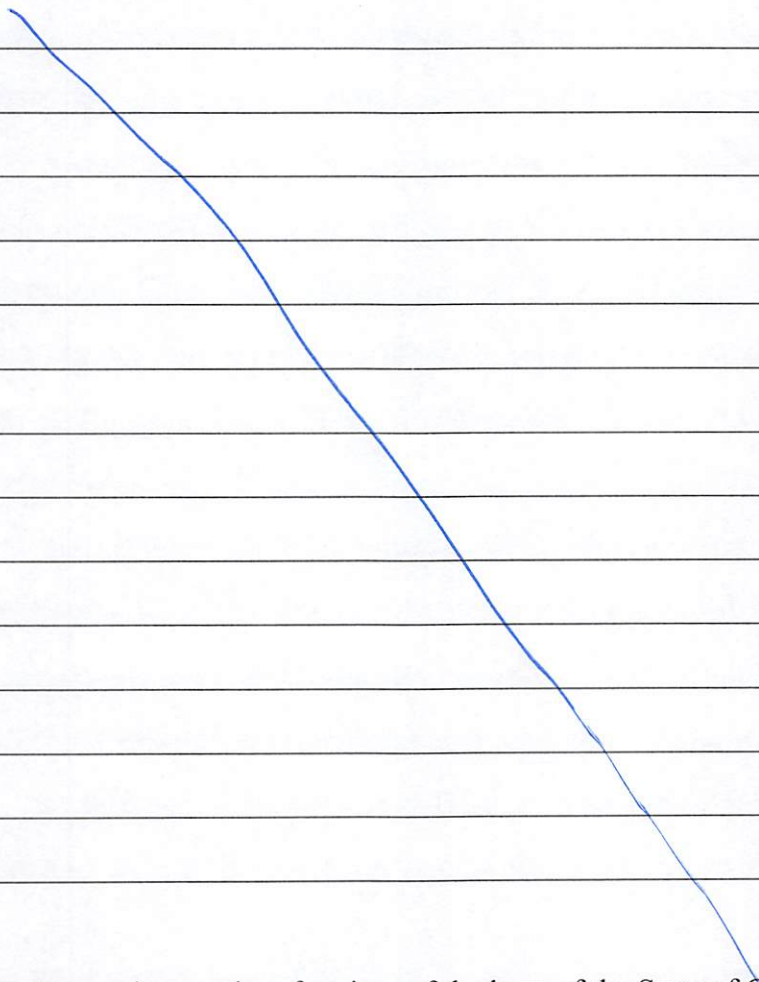
28 28. I feel like I'm losing it. I'm afraid of losing

my job if I don't get out soon and my apartment.

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29. The vents in the ceiling are covered with plastic. A group before us ^{most had} used spoons to stick the plastic over the vent. I leave it that way because it's cold in here.

30. I also feel sorry for the circumstance I am in and wish I could have met you ^{in person} in a different platform.



I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 16th day of Feb., 2023 in Los Angeles, California.

Printed name: 
Darryl Beck

Exhibit 3

Declaration of Quincy Brown

I, Quincy Ray Brown, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. I have been here at the IRC for ten days.

3. I have been diagnosed with the following: diabetes, bipolar disorder and schizophrenia. I take Abilify and Trazodone. Trazodone normally helps me sleep. Without it, I can't stay awake for days. I have not received my mental health medications the whole time I've been incarcerated.

4. I have been housed in a single cell at IRC 231.

5. At the time of my arrest, I hurt my shoulder. I have only received one dose of medication for the pain. But I still have pain.

6. My cell is not regularly cleaned.

7. I have not had access to a shower since I arrived.

8. I have not been able to contact my family. I have not been able to make phone calls since I got here.

9. I do not have a blanket and mattress in my cell.

10. I asked for a written complaint but never received one.

11. I asked to speak to a sergeant but was told by staff I am not allowed to do so, then they slammed my food tray door.

12. I was told I would be transferred to MCJ about 6-7 days ago but have not received further information.

13. I feel upset and stressed by the fact that I have been waiting here for days, without my mental health meds or a shower or a phone call.

14. There is usually trash piled in my cell. They don't come clean it.

15. ACLU representatives Amanda Goad and Marisol Dominguez-Ruiz interviewed me in IRC 231 on October 19 and took notes. They wrote out this declaration on my behalf and went over its contents with me before I signed.

1 I declare under penalty of perjury of the laws of the State of California and
2 the United States that the foregoing is true and correct. Executed this 19th day of
3 October, 2022 in Los Angeles, California.

4

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Quincy Brown

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7 I, Marisol Dominguez-Ruiz, interviewed Mr. Brown in the IRC on October
8 19, 2022, took notes and then wrote up his declaration, which is attached. I read
9 Mr. Brown the declaration, he approved its contents and signed it. I have reviewed
10 this word-processed version of this declaration and declare that it accurately
11 reflects the content of the handwritten, signed version.

12

13 I declare under penalty of perjury of the laws of the State of California and
14 the United States that the foregoing is true and correct. Executed February 24,
15 2023, in Los Angeles, California.

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Marisol Dominguez-Ruiz

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1 Declaration of Quincy Brown

2 I, Quincy Ray Brown, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I have been here at the IRC for ten days.

6 3. I have been diagnosed with the following: diabetes, bipolar disorder
7 and schizophrenia. I take abilify and trazodone. Trazodone normally
8 helps me sleep. without it, I can't stay awake for days. I have not
9 received my mental health medications the whole time I've been
10 incarcerated.

11 4. I have been housed in a single cell at IRC 231.

12 5. At the time of my arrest, I hurt my shoulder. I have only
13 received one dose of medication for the pain. But I still have pain.

14 6. My cell is not regularly cleaned

15 7. I have not had access to a shower since I arrived.

16 8. I have not been able to contact my family. I have not been
17 able to make phone calls since I got here.

18 9. I do have a blanket and mattress in my cell.

19 10. I asked for a written complaint but never received one.

20 11. I asked to speak to a sergeant but was told by staff I am not
21 allowed to do so, then they ~~slammed~~ ^{slammed} my food tray down.

22 12. I was told I would be transferred to MCJ about 6-7 days
23 ago but have not received further information.

24 13. I feel upset and stressed by the fact that I have been waiting
25 here for days, without my mental health meds or a shower or a phone call.

26 13. There is usually trash piled in my cell. They don't come clean it.

27 14. ACLU representatives Amanda Goad and Marisol Dominguez-Ruiz
28 interviewed me in IRC 231 on October 19 and took notes. They wrote

1 out this declaration on my behalf and went over its contents
2 with me before I signed.

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22 I declare under penalty of perjury of the laws of the State of California and the United
23 States that the foregoing is true and correct. Executed this 19th day of October, 2022 in Los
24 Angeles, California.

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26 Printed name: _____

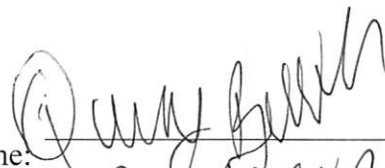
27 
28 Quincy Ray Brown

Exhibit 4

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Declaration of Reggie Candler 6504142

I, Reggie Candler, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. I was arrested in the fall of 2022. I think it was September 18, 2022. Before I was arrested I was taking 200 mg Seroquel.

3. I have been diagnosed with bi-polar and I hear voices. But the Seroquel helps stop the voices.

4. When I was arrested I was taken to the IRC. I told the doctor that I was taking Seroquel and needed to keep taking it. I told them they could contact Telecare and confirm I had a Seroquel prescription. But I did not get my meds.

5. It took me about two months before I got my meds. When I was off my meds I was hearing voices a lot. I also got paranoid and felt like people were following me and taking information from my brain.

6. I am housed in 162 pod in TTCF. It is filthy here. There is feces on the walls. I try to keep my cell clean but they do not give me gloves. The toilet was caked up with shit when I got to my cell and I have to use a bread wrapper and pair of boxers to clean it up. There was also food and maybe shit on the light fixture.

7. There are also bugs and gnats all over. I wake up in a cold sweat and bugs on my face.

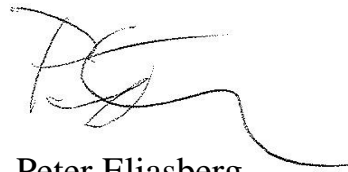
I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 3rd day of February 2023, in Los Angeles, California.

Reggie Candler

I, Peter Eliasberg, interviewed Mr. Candler in the Twin Towers on February

1 3, 2023, took notes and then wrote up his declaration, which is attached. I read Mr.
2 Candler the declaration, he approved its contents and signed it. I have reviewed
3 this word-processed version of this declaration and declare that it accurately
4 reflects the content of the handwritten, signed version.

5 I declare under penalty of perjury of the laws of the State of California and
6 the United States that the foregoing is true and correct. Executed February 24,
7 2023 in Los Angeles, California.

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11 Peter Eliasberg

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1 Declaration of REGGIE CANDLER 6504142

2 I, REGGIE CANDLER, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I was arrested in the fall
6 of 2022. I think it was September,
7 18, 2022. Before I was arrested
8 I was taking 200 mg Seroquel

9
10 3) I have been diagnosed with
11 Bi-Polar and I hear voices
12 But the Seroquel helps stop
13 the voices.

14
15 4) When I was arrested I
16 was taken to IJC. I told the
17 doctors that I was taking
18 Seroquel and needed to keep
19 taking it. I told them they
20 could contact Telecare and
21 confirm I had a Seroquel
22 prescription. But I did not
23 get my meds.

24
25 5) It took me about two months
26 before I got my meds.
27 When I was off my meds
28 I was hearing voices a lot
I also got paranoid and

1 felt like people were following
2 me and taking information
3 from my brain
4

5 6) I am housed in ~~the~~¹⁶² pod in
6 ITCF. It is filthy here. There
7 is feces on the walls. I try
8 to keep my cell clean but they
9 do not give me gloves.

10 The toilet was caked up
11 with shit when I got to my
12 cell + I had to use a
13 bread wrapper + pair of
14 boxers to clean it up. There
15 was also food + maybe shit
16 on the light fixture.

17 7) There are bugs + gnats - all
18 over. I wake up in a
19 cold sweat + bugs on my
20 face
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22 I declare under penalty of perjury that the contents of this document are true and correct. Executed this 24th day of February 2023 in Los Angeles, California.

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Barbara Candler

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 3rd day of February, 2023 in Los Angeles, California.

Printed name:

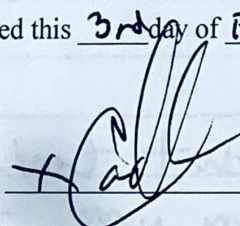

Reggie Candler

Exhibit 5

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Declaration of Richard Henry Cisneros 6543008

I, Richard Henry Cisneros, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:
2. I am currently housed in IRC-231 Pod A, cell 11.
3. I have been housed here for about four days.
4. I first arrived to the IRC on Monday, January 30, 2023. I was there for about 24 hours. I was seen by a mental health provider.
5. During my evaluation, I told the mental health professional that I am taking medication for my mental health diagnoses.
6. I am diagnosed with schizophrenia, depression, and anxiety. When I am in the community, I am prescribed with Gababiven [sic], another medication for sleep, and a third medication I can't recall the name of.
7. I thought I would receive medication once I told them but I've yet to receive any medication.
8. I have not been seen by a mental health provider since the first day I was evaluated.
9. The last time I had access to my medication and took my medication was on Monday (1/30/23), the day of my arrest.
10. In the community, I am seen by Telecare provider. I go to a facility in Norwalk for treatment.
11. Since I have arrived I have not had access to a shower.
12. The third medication might be Abilify.
13. The last time I was here was in 2022 for at least three (3) months due to a parole violation. During that time I received the appropriate medication and a psych professional would talk to me. I was housed in MCJ-2900.
14. Without my medication, I feel lost, I feel anxiety.
15. When I am in the community I am consistent about taking my

1 medication.

2

3 I declare under penalty of perjury of the laws of the State of California and
4 the United States that the foregoing is true and correct. Executed this 3rd day of
5 February 2023, in Los Angeles, California.

6

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Richard Cisneros

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9 I, Marisol Dominguez-Ruiz, interviewed Mr. Cisneros in the IRC on
10 February 3, 2023, took notes and then wrote up his declaration, which is attached. I
11 read Mr. Cisneros the declaration, he approved its contents and signed it. I have
12 reviewed this word-processed version of this declaration and declare that it
13 accurately reflects the content of the handwritten, signed version.

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I declare under penalty of perjury of the laws of the State of California and
the United States that the foregoing is true and correct. Executed February 24,
2023, in Los Angeles, California.

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Marisol Dominguez-Ruiz

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1 Declaration of Richard Henry Cisneros, Booking #16543008

2 I, Richard Henry Cisneros, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I am currently housed in IRC - 231 Pod A, cell 11.

6 3. I have been housed here for about four days.

7 4. I first arrived to the IRC on Monday, January 30, 2023.

8 I was there for about 24 hours. I was seen by a mental
9 health provider.

10 5. During my evaluation, I told the mental health professional
11 that I am taking medication for my mental health diagnoses.

12 6. I am diagnosed with schizophrenia, depression, and anxiety. When
13 I am in the community I am prescribed with gabapentin, another
14 medication for sleep, and a third medication I can't recall the name of.

15 7. I thought I would receive medication once I told them but I've
16 yet to receive any medication.

17 8. I have not been seen by a mental health provider since the
18 first day I was evaluated.

19 9. The last time I had access to my medication and took my
20 medication was on Monday (1/30/23), the day of my arrest.

21 10. In the community, I am seen by Telecare provider. I go to
22 a facility in Norwalk for treatment.

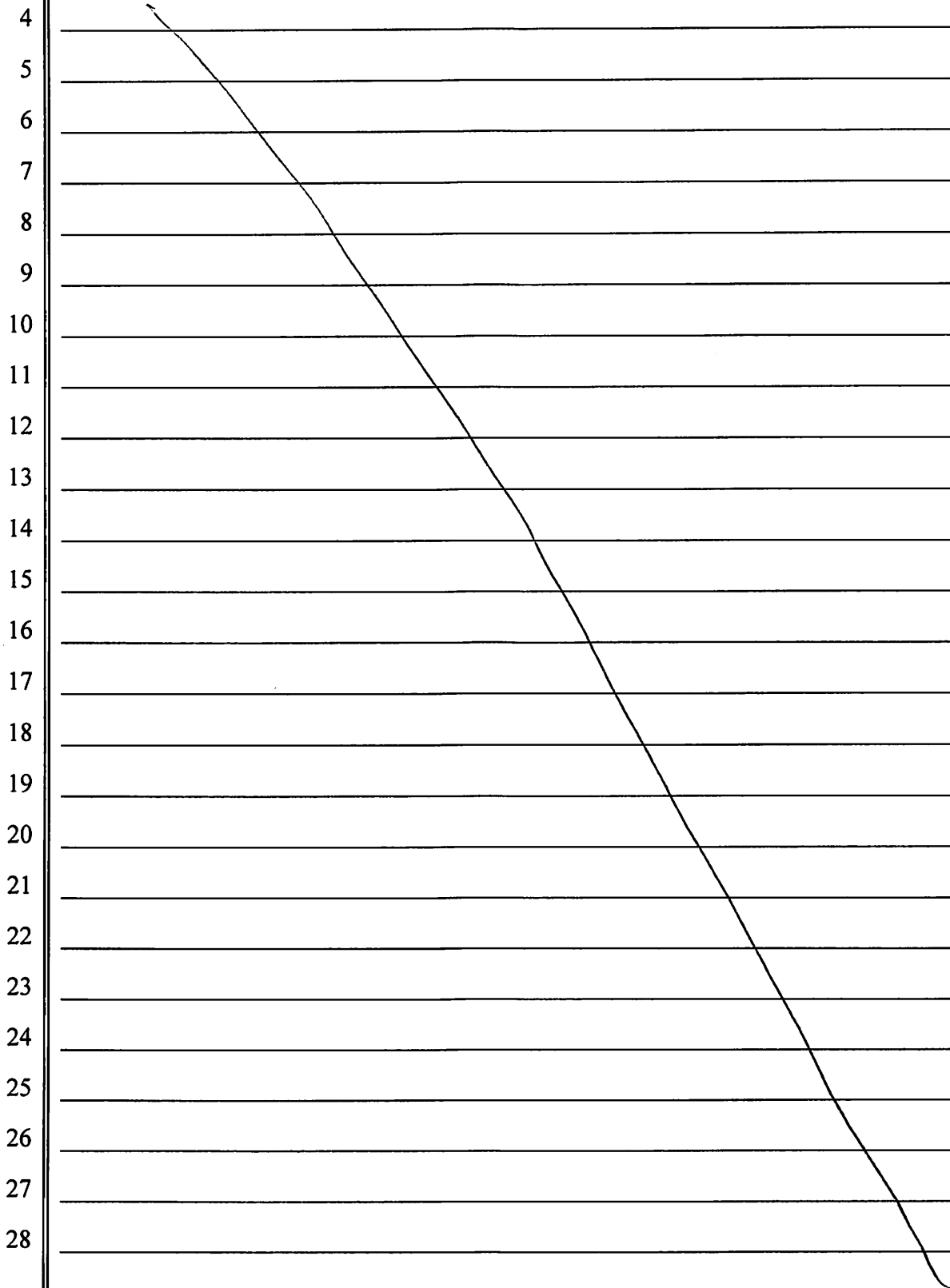
23 11. Since I have arrived I have not ~~been~~ ~~given~~ had access to
24 a shower.

25 12. The third medication might be ability.

26 13. The last I was here was in 2022 for at least three (3) months
27 due to a parole violation. During that time I received the
28 appropriate medication and a psych professional would talk to me.
I was housed in MCJ - 2900.

1 14. Without my medication, I feel lost, I feel anxiety. RC

2 15. When I am in the community I am ^{consistent} about taking my
3 medication.



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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 3rd day of Feb, 2023 in Los Angeles, California.

Printed name: Richard Cisneros
Richard CISNEROS

Exhibit 6

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Declaration of Raymond Crowley 6499348

I, Raymond Crowley, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. My booking number is 6499348.

3. I was diagnosed with schizophrenia at age 12.

4. I was diagnosed with Tardive Dyskinesia at age 22.

5. In the community I take 5 mgs of Artane twice a day and 400 mgs of Seroquel once per day at night, and 150 mgs of Wellbutrin per day.

6. I graduated from the ODR program in Harmony House in August 2022.

7. An Amity case manager coordinates my mental health medications: the Artane and the Seroquel and Wellbutrin. I was most recently in a program called Mentors at La Brea and Washington.

8. I was arrested in Lancaster on November 10, 2022.

9. The last day I took my medications before arrest was November 9, 2022.

10. At IRC, I told medical about my meds. I also told mental health about my medications. I did not receive any medication in IRC.

11. I then went to MCJ 2900 after IRC. I was in IRC for less than one day.

12. In MCJ 2900 I talked to a clinician. She could not start my medication because she was not a psychiatrist. I told her I was getting meds through Amity.

13. At IRC I started feeling symptoms from not being on medications. I was hearing voices, seeing faces in my food and in the wall. I told the mental health clinician that I was having these symptoms. I was also shaking and my leg became numb.

14. The same symptoms continued when I was in MCJ. I was in MCJ for

1 a little less than 3 weeks.

2 15. I was transferred to Twin Towers 131 F-Pod. I am still in 131 F-Pod.

3 16. In Twin Towers I put in forms for my medication and explained my
4 symptoms. They took me to urgent care. In urgent care the nurse practitioner said
5 she could not help me with medication and that I had to wait to see the psychiatrist.

6 17. My symptoms continued in Twin Towers, but I felt a little better
7 being in a dorm setting with TV and people to talk to. In MCJ I was in a 6 person
8 cell.

9 18. A little after Christmas, no later than the first week of January, a
10 psychiatrist came to see me. She asked me about my diagnosis, symptoms and
11 medication. She said she could not give me Artane, Seroquel, or Wellbutrin unless
12 I was taking it on the street. I gave her the number to my Amity Foundation case
13 manager.

14 19. That night, I got my first dosage of medications. Just the Artane and
15 Seroquel. The psychiatrist offered to put me on Effexor instead of Wellbutrin, but I
16 declined because I am worried about how side effects could interfere with my
17 Tardive Dyskinesia.

18 20. After about a week or two of being on my medications, I stopped
19 hearing voices.

20 21. About two and a half weeks after starting the Artane, the symptoms of
21 muscle twitching became manageable.

22 22. I have received my medication every day since it started.

23

24 I declare under penalty of perjury of the laws of the State of California and
25 the United States that the foregoing is true and correct. Executed this 3rd day of
26 February 2023, in Los Angeles, California.

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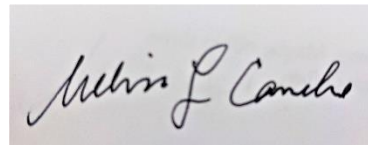
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Raymond Crowley

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I, Melissa Camacho, interviewed Mr. Crowley in Twin Towers on February 3, 2023, took notes and then wrote up his declaration, which is attached. I read Mr. Crowley the declaration, he approved its contents and signed it. I have reviewed this word-processed version of this declaration and declare that it accurately reflects the content of the handwritten, signed version.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed February 24, 2023, in Los Angeles, California.

A rectangular box containing a handwritten signature in cursive script that reads "Melissa L. Camacho".

Melissa Camacho

1 Declaration of Raymond Crowley

2 I, Raymond Crowley, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. My booking number is 6499348.

6 3. I was diagnosed with Schizophrenia at age 12.

7 4. I was diagnosed with Tardive Dyskinesia at age 22.

8 5. In the community I take 5 mgs of Artane twice
9 a day and 400 mgs of Seroquel once per day at
10 night, and 150 mgs of Wellbutrin per day.

11 6. I graduated from the ODR program in Harmony
12 House in August 2022.

13 7. An Amity case manager coordinates my mental
14 health medications: the Artane and the Seroquel and Wellbutrin.
15 I was most recently in a program called Mentors at
16 La Brea and Washington.

17 8. I was arrested in Lancaster on November 10, 2022.

18 9. The last day I took my medications before arrest
19 was November 9, 2022.

20 10. At IRC, I told medical about my meds.

21 I also told mental health about my medications. I did not
22 receive any medication at the
23 IRC

24 11. I then went to MCT 2900 after IRC. I was in
25 IRC for less than one day.

26 12. In MCT 2900 I talked to a clinician. She could
27 not start my medication because she was not a psychiatrist.
28 I told her I was getting meds through Amity.

13. At IRC I started feeling symptoms from not being on
medications. I was hearing voices, seeing faces in my

1 food and in the wall. I told the mental health
2 clinician that I was having these symptoms. I was
3 also shaking and my leg became numb.

4 14. The same symptoms continued when I was in
5 MCT. I was in MCT for a little less than
6 3 weeks.

7 15. I was transferred to Twin Towers 131 F-Pod.
8 I am still in 131 F-Pod.

9 16. In Twin Towers I put in forms for my medication
10 and explained my symptoms. They took me to
11 urgent care. In urgent care the nurse practitioner
12 said she could not help me with medication and that
13 I had to wait to see the psychiatrist.

14 17. My symptoms continued in Twin Towers, but
15 I felt a little better being in a dorm setting with
16 TV and people to talk to. In MCT I was in a
17 6 person cell.

18 18. A little after Christmas, no later than the first
19 week of January, a psychiatrist came to see me.

20 She asked me about my diagnosis, symptoms and PC
21 medication. She ~~then~~ said she could not give ~~me~~ me
22 Artane, Seroquel, or Wellbutrin unless ~~to~~^I was taking it
23 on the street. I gave her the number to my Amity
24 Foundation case manager.

25 19. That night, I got my first dosage of medications.
26 Just the Artane and Seroquel. The psychiatrist
27 offered to put me on Effexor instead of Wellbutrin,
28 but I declined because I am worried about how
side effects would interfere with my Tardive Dyskinesia.

RC

- 1 ^{After} 20. ~~About~~ a week or ^{two} ~~weeks and a half~~ of being on
- 2 my medications, I stopped hearing voices.
- 3 21. About two and a half weeks after starting
- 4 the Artane, the symptoms of muscle twitching
- 5 became manageable.
- 6 22. I have received my medication every
- 7 day since it started.

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22 I declare under penalty of perjury of the laws of the State of California and the United

23 States that the foregoing is true and correct. Executed this 3 day of February, 2023 in Los

24 Angeles, California.

25 Raymond Crowley

26 Printed name: Raymond Crowley

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Exhibit 7

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Declaration of Elder Escobar 6553175

I, Elder Escobar, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:
2. I am here in the Inmate Reception Center Clinic. I have been here since 2/15/23 in the morning.
3. I have only been seen by medical evaluation but have not been seen by mental health. I was told to wait.
4. I have slept on the chairs – I was told not to sleep on the floor even though there are a couple of people on the floor covering themselves with plastic bags for warmth.
5. I asked for blankets but I was told I couldn't have one because there are not enough. At one point I had a plastic bag so I could sit on it while I sat on the floor because the floor is dirty. They took the plastic bag away as well.
6. Yesterday there was not enough food for everyone so we had to wait until more food was brought. Yesterday I only received lunch and dinner.
7. Yesterday, 2/16/23, there was not enough toilet paper. Today they put toilet paper available so we could grab some.
8. I have been told I need to wait for mental evaluation so I can go to housing.
9. I have been at the IRC for more than 24 hours.
10. Inside the caging cell the toilet has been clogged while I've been here.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 17th day of February, 2023, in Los Angeles, California.

Elder Escobar

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I, Marisol Dominguez-Ruiz, interviewed Mr. Escobar in the IRC on February 17, 2023, took notes and then wrote up his declaration, which is attached. I read Mr. Escobar the declaration, he approved its contents and signed it. I have reviewed this word-processed version of this declaration and declare that it accurately reflects the content of the handwritten, signed version.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. February 24, 2023, in Los Angeles, California.



Marisol Dominguez-Ruiz

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Declaration of Elder Escobar, #6553175

I, Elder Escobar, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. I am here in the Inmate Reception Center clinic. I have been here since 2/15/23 in the morning.

3. I have only been seen ^{by} ~~my~~ medical evaluation but have not been seen by mental health. I was told to wait

4. I have slept on the chairs - I was told not to sleep on the floor even though there are a couple of people on the floor covering themselves in plastic bags for warmth.

5. I asked for blankets but I was told I couldn't have one because there are not ~~to~~ enough. At one point I had a plastic bag so I could sit on it while I sat on the floor because the floor is dirty. They took the plastic bag away as well.

6. Yesterday ~~there was~~ there was not enough food for everyone so we had to wait until more food was brought. Yesterday I only received lunch and dinner. ~~the~~

7. Yesterday, 2/16/23, there was not enough toilet paper. Today they put toilet paper available so we could grab some.

8. I have been told I need to wait for mental evaluation so I can go to housing.

9. I have been at the IRC for more than 24 hours.

10. Inside the caging cell the toilet has been clogged while I've been here.

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 17 day of FEB, 2023 in Los Angeles, California.

Printed name: E. Escobar
Elder Escobar

Exhibit 8

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Declaration of Lester Evans 6484313

I, Lester Evans, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. My booking number is 6484313.

3. I was brought to IRC on Monday October 17, 2022 at around 11:00 am.

4. I went through the booking process and then waited in the IRC clinic until Monday at around 10 pm.

5. I was brought to custody line cell 216 at around 10 pm on Tuesday. I was told I was waiting for a bed.

6. The cell got dirty, like a pig pen. They did not come to clean until it was massively dirty. We had to ask them to empty the trash can when it was completely full.

7. The cell is cold. One person covered the vent with a garbage bag to try and block the cold air.

8. At one point the cell had about 18 people in it. People were packed in and sleeping on the benches, under the benches, and laying next to each other on the ground.

9. I got dinner in cell 216 on Tuesday night. After dinner those of us in 216 were called out of the cell. We joined people from other cells in the hallway. We were all told we were going to temporary housing.

10. They took me with the group to IRC 231. People in the cell were banging on the doors. At least one person was putting feces on the door. I heard a guard yelling at him to stop “putting shit on the door.” I only got about one and a half hours of sleep.

11. I got breakfast in IRC 231. After breakfast I was brought back to the IRC custody line cell 216. I was told that I am still waiting for a bed.

1 12. When I returned to the cell there was a garbage bag covering urine on
2 the floor. We have told the guards about the urine on the floor but no one has come
3 to clean it.

4 13. We are treated like animals. When I need to go to the bathroom and
5 we are out of paper, we ask for paper, but they won't bring it for hours.

6 14. I did a 37 year prison sentence. This is worse. It's filthy. People
7 shouldn't live like this.

8 15. ACLU representative Melissa Camacho interviewed me in the custody
9 line cell on October 19 and took notes. She wrote out this declaration on my behalf
10 and went over its contents with me before I signed.

11

12 I declare under penalty of perjury of the laws of the State of California and
13 the United States that the foregoing is true and correct. Executed this 19th day of
14 October, 2022, in Los Angeles, California.

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Lester Evans

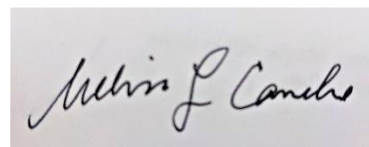
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18 I, Melissa Camacho, interviewed Mr. Evans in the IRC on October 19, 2022,
19 took notes and then wrote up his declaration, which is attached. I read Mr. Evans
20 the declaration, he approved its contents and signed it. I have reviewed this word-
21 processed version of this declaration and declare that it accurately reflects the
22 content of the handwritten, signed version.

23 I declare under penalty of perjury of the laws of the State of California and
24 the United States that the foregoing is true and correct. Executed February 24,
25 2023, in Los Angeles, California.

26

27



28

Melissa Camacho

1 Declaration of Lester Evans 6484313

2 I, Lester Evans, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. My booking number is 6484313.

6 3. I was brought to IRC on Monday October 17, 2022 at
7 around 11:00 pm.

8 4. I went through the booking process and then waited in
9 the IRC Clinic until ~~Tuesday~~ ^{Monday} at around 10 pm.

LE

10 5. I was brought to custody line cell 216 at around
11 10 pm on Tuesday. I was told I was waiting for a bed.

12 6. The cell got dirty, like a pig pen. They did not come
13 to clean until it was massively dirty. We had to ask them
14 to empty the trash can when it was completely full.

15 7. The cell is cold. One person covered the vent with a garbage
16 bag to try and block the cold air.

17 8. At one point the cell had about 18 people in it. People
18 were packed in and sleeping on the benches, under the benches,
19 and laying next to each other on the ground.

20 9. I got dinner in cell 216 on Tuesday night. After
21 dinner those of us in 216 were called out of the cell. We
22 joined people from other cells in the hallway. We were all
23 told we were going to temporary housing.

24 10. They took me with the group to IRC 231, Epod. I
25 was given a mattress and blanket and a bed in the day
26 room.

27 11. I could not sleep in IRC 231. People in the cells were
28 banging on the doors. At least one person was putting ~~out~~ feces

1 on the door. I heard a guard yelling at him to stop "putting
2 shit on the door." I only got about one and a half
3 hours of sleep.

4 12. I got breakfast in IRC 231. After breakfast I was brought
5 back to the IRC custody line cell 216. I was told that I am
6 still waiting for a bed.

7 13. When I returned to the cell there was a garbage bag covering
8 urine on the floor. We have told guards about the urine on the
9 floor but no one has come to clean it.

10 14. We are treated like animals. When I need to go to
11 the bathroom and we are out of paper, we ask for paper but
12 they won't bring it for hours.

13 15. I did a 37 year prison sentence. This is worse.
14 It's filthy. People shouldn't live like this. Animals live
15 like this.

16 16. ACLU representative Melissa Camacho interviewed
17 me in the custody line cell on October 19 and took notes.
18 She wrote out this declaration on my behalf and went over
19 its contents with me before I signed
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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 19th day of October, 2022 in Los Angeles, California.

Printed name: *[Signature]*
vester EVAN

Exhibit 9

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Declaration of Bobby Fernandez 6509128

I, Bobby Fernandez, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:
2. I am currently housed at Men’s Central Jail in Dorm 5550.
3. I was arrested on December 16, 2022 for a probation violation.
4. At the time of my arrest I was prescribed medication, including Zoloft, Suboxone, and Depakote [sic]. The last time I took my medication was the day of my arrest.
5. My medication was prescribed by Wesley Health Center and by LA Cada. I would pick up my medication from CVS. My insurance is Blue Shield.
6. My prescription requires me to take my medication daily. Although I do get my seizure medication (Keppra) in jail I have not received my medication for anxiety (Zoloft) and Suboxone.
7. While I was in court on 12/16/22, I began to have seizures. From there I was sent to Norwalk Community Hospital. I was hospitalized for 5 or 6 days.
8. At Norwalk Community Hospital, I was not given any medication.
9. On Dec. 21, 2022, deputies picked me up from Norwalk Community Hospital and was brought to IRC.
10. I was at IRC for two days. I arrived on a Friday evening.
11. While I was at IRC, I was put in one cell for about a day and a half and in another cell for about 12 hours.
12. I was in each cell longer than 12 hours.
13. The temperature at the IRC was very cold. I was not provided a blanket. I asked for one but was told “we could not get one.” I did not have a mattress.
14. At one point, I had to kick the door to get deputies attention so I could get toilet paper.

1 15. The toilet of the cell I was in did not work. It did not flush. It seemed
2 to be backed up. I told deputies when they opened the tray slot. This was the
3 medical clinic cell.

4 16. One of the cells I was in was behind medical clinic – it is where they
5 hold k-10s. These are different from cells in the hall.

6 17. There was no trash can so there was trash on the floor.

7 18. While at IRC, I only received a meal on Saturday evening. It was only
8 a burrito. There was no juice or liquids provided. I did not have access to drinking
9 water.

10 19. The Saturday I was at IRC, around 1 AM, I went man down. I
11 received attention within 15-20 minutes. I was back in my cell by 2 AM after being
12 in urgent care.

13 20. At IRC, I received a medical evaluation. I gave them my medical
14 papers from Norwalk Community Hospital. I told them about all the medication I
15 am on. I was told they would look into it. I told them I got prescriptions from LA
16 Cada and Wesley Health Center. I felt like they were trying to hurry me up.

17 21. On Sunday, I was moved to 3500 in Men’s Central Jail around 9 pm.

18 22. While at 3500, I submitted 3 slips for medication. I was informed I’d
19 be there for a short time. I was not allowed to use the phone. I was told it’s because
20 I am on fishrow. I did not have a blanket at 3500.

21 23. I arrived to my current dorm on Tuesday, after Christmas, 12/27/22.

22 24. I slept on the floor the first night without a mattress or blanket
23 because there was no bunk. I asked for a bunk and mattress and a deputy said they
24 were working on it.

25 25. I have not received my medication – Zoloft and Suboxone.

26 26. I put in a slip three days ago. Yesterday, I approached a psych person
27 and asked to see a doctor. I was told I needed to wait my turn. As of today, I have
28 not been seen by a mental health provider.

1 Declaration of Bobby Fernandez, 6509128

2 I, BOBBY Fernandez, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I am currently housed at Men's Central Jail in
6 Dorm 5550.

7 3. I was arrested on December 16, 2022 for a parole probation
8 violation

9 4. At the time of my arrest I was prescribed medication,
10 including Zoloft, Suboxone, and Depacot. The last time I
11 took my medication was the day of my arrest.

BF

12 5. My medication was prescribed by Dr. Wesley ^{Health Center} and by
13 LA Cash Health Center, I would pick up my medication
14 from CVS. My insurance is Bliveshield.

BF

15 6. My prescription requires me to take my medication
16 daily. Although I do get my seizure medication (Kepra) in jail
17 I have not received my medication for anxiety (Zoloft)
18 and suboxone.

19 7. While I was in court on 12/16/22, I began to have
20 seizures. From there I was sent to Norwalk Community
21 Hospital. I was hospitalized for 5 or 6 days.

22 8. At Norwalk Community Hospital, I was not given any
23 medication.

24 9. On Dec. 21, 2022 deputies picked me up from Norwalk
25 Community Hospital and was brought to IRC.

26 10. I was at IRC for two days. I arrived on a Friday
27 evening.

28 11. While I was at IRC, I was put in one cell for about a

1 day and a half and in another cell for about 12 hours.

2 12. I was in each cell longer than 12hrs.

3 13. The temperature at the IRC was very cold. I was
4 not provided a Blanket. I asked for one but was told
5 "we could not get one." I did not have a mattress.

6 14. At one point, I had to kick the door to get deputies
7 attention so I could get toilet paper.

8 15. The toilet of the cell I was in did not work. It did not
9 flush. It seemed to be backed up, I told deputies
10 when they opened the tray slot. This was the medical clinic cell.

11 16. One of the cells I was in was behind medical clinic -
12 it is where they hold K-10s. These are different from cells in ^{the} hall.

13 17. There was no trash can so there was ~~an~~ trash on
14 the floor

15 18. While at IRC, I only received a meal on Saturday
16 evening. It was only a Burrito. There was no juice or
17 liquids provided. I did not have access to drinking
18 water.

19 19. The Saturday I was at IRC, around 1 AM, I went Mandown.
20 I received attention within 15-20 minutes. I was back in
21 my cell by 2:30 AM after being in urgent care.
22 BF

23 20. At IRC, I received a medical evaluation. I gave
24 them my medical papers from Norfolk Community
25 Hospital. I told them about all the medication I am on.
26 I was told they would look into it. I told them I got
27 prescriptions from LA Cara and Wesley Health Center.
28 ~~As~~ I felt like they were trying to hurry me up.

BF

1 21 on Sunday, I was moved to 3500 ^{in Men's Central Jail} around 9pm.

2 22. While at 3500, I submitted 3 slips for medication.

3 I was informed I'd be there for a short time. I was not
4 allowed to use the phone. I was told it's because I am
5 on fishrow. I did have a blanket at 3500.

6 23. I arrived to my current dorm on Tuesday, after
7 Christmas, 12/27/22.

8 24. I slept on the floor ^{the first night} without a mattress or blanket because there
9 was no bunk. I asked for a bunk and mattress and a deputy said they were
10 working on it.

10 25. I have not received my medication - zoloff & suboxone.

11 26. I put in a slip three days ago. Yesterday, I approached
12 a psych person and asked to see a doctor. I was told I
13 needed to wait my turn. As of today, I have not been
14 seen by a Mental Health provider.

15 27. I am experiencing symptoms because I have not
16 received medication. I feel agitated, I cannot sleep, I am
17 sweaty, I keep needing to use the restroom, I am restless.

18 28. I received my seizure medication in 3500, about three
19 days after arriving in 3500, and I receive it every day. The
20 medication, however, is not the same as my prescription, ^{which} and it
21 gives me headaches and makes me feel like I could still have a seizure.

22 I declare under penalty of perjury of the laws of the State of California and the United
23 States that the foregoing is true and correct. Executed this 12th day of January, 2023 in Los
24 Angeles, California.

25
26 Printed name: Bobby Fernandez
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Exhibit 10

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Declaration of Jaime Garcia Alfaro 6525026

I, Jaime Garcia Alfaro, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. I am currently housed in Twin Towers 171 – B Pod, cell 2.

3. I am diagnosed with depression, bipolar disorder, anxiety, and schizophrenia.

4. I take 6 different types of medication when I am in the community, one of the meds includes Busbar.

5. I have a long history of mental health issues. I was first diagnosed around age of 16. I am now 29 years old.

6. Two weeks prior to my arrest I did forget to take my medication because I was working a lot. But in general, I am consistent about taking my medication when I am in the community.

7. I was arrested on Jan. 20, 2023 and was held at Santa Monica Police Station for 1 or 2 days. I told them I needed medications but nothing was done.

8. I was brought to IRC around 1/23/23 and stayed there for about 24 hours. While there, I was asked if I wanted to be in general population. I said, “Yes but I need my medication.”

9. At IRC, I let them know I need medication for my mental health. I was told someone would come talk to me.

10. I was housed in general population but did not receive any medication. I had to fill out a medical slip for my glasses to get their attention to ask for my psych medication.

11. During this visit I was asked if I was suicidal and I said yes, and that I felt anxious and could not sleep.

12. From there I was moved to a different single cell in Twin Towers. I was given a suicide watch gown, no blanket and no mattress were provided.

1 13. During those four days, I was visited by a clinician who asked if I'd
2 consider Remron [sic] for medication. I agreed to it. However, I have not received
3 any Remron [sic] or other psych medication.

4 14. I was also visited by a clinician who asked me if I felt suicidal.

5 15. After 4 days, I was transferred to my current cell in TTCF-171-B2.
6 This cell is very dirty, toilet leaks, smells, it is moldy. I feel my skin drying out
7 from smell. I have not been given a shower or had access to a shower for about a
8 week.

9 16. I have not received any psych medication since my incarceration. I've
10 told staff here I need my medication.

11 17. I can't sleep, I am experiencing memory loss, shift of emotions,
12 sometimes I feel angry, sometimes I am okay. It is a range of emotions.

13

14 I declare under penalty of perjury of the laws of the State of California and
15 the United States that the foregoing is true and correct. Executed this 3rd day of
16 February 2023, in Los Angeles, California.

17

18

Jaime Garcia Alfaro

19

20 I, Marisol Dominguez-Ruiz, interviewed Mr. Alfaro in Twin Towers
21 Correctional Facility on February 3, 2023, took notes and then wrote up his
22 declaration, which is attached. I read Mr. Alfaro the declaration, he approved its
23 contents and signed it. I have reviewed this word-processed version of this
24 declaration and declare that it accurately reflects the content of the handwritten,
25 signed version.

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I declare under penalty of perjury of the laws of the State of California and
the United States that the foregoing is true and correct. Executed February 24,
2023, in Los Angeles, California.

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Marisol Dominguez-Ruiz

1 Declaration of Jaime Garcia Alfaro, # 6525026

2 I, Jaime Garcia Alfaro, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I am currently housed in Twin Towers¹⁷¹ - B Pod, cell 2.

6 3. I am diagnosed with depression, bipolar disorder, anxiety
7 and schizophrenia.

8 4. I take 6 different types of medication when I am in the
9 community, one of the med includes Buspar.

10 5. I have a long history of mental health issues. I
11 was first diagnosed around age of 16. I am now
12 29 years old.

13 6. Two weeks prior to my arrest I did forget to take my medication
14 because I was working a lot. But in general, I am consistent
15 about taking my medication when I am in the community.

16 7. I was arrested on Jan. 20, 2023 and was held at
17 Santa Monica Police Station for 1 or 2 days... I told them
18 I needed medications but nothing was done.

19 8. I was brought to IRC around 1/23/23 and stayed
20 there for about 24 hours. While there, I was asked
21 if I wanted to be in general population. I said "yes
22 but I need my medication."

23 9. At IRC, I let them know I need medication for
24 my mental health. I was told someone would come
25 talk to me.

26 10. I was housed in general population but did not
27 receive any medication. I had to fill out a medical
28 slip for my glasses to get their attention to ask
for my psych medication

1 11. During this visit I was asked if I was suicidal and I
2 said yes, and that I felt anxious & could not sleep.

3 12. From there I was moved to a different single^{cell} in
4 Twin Towers. I was given a suicide watch, ~~no~~ Blanket
5 and no mattresses were provided. ↳ gown JOT

6 13. During those four days, I was visited by a clinician
7 who asked if I'd consider Remeron for medication, I
8 agreed to it. However, I have not received any
9 Remeron or other psych medication

10 14. I was also visited by a clinician who asked me if I
11 felt suicidal.

12 15. After 4 days, I was transferred to my current cell.
13 in ~~room~~ TTCF - 171-B2. This cell is very dirty, toilet
14 leaks, smells, it is moldy. I feel my skin drying out
15 from smell. I have not been given a shower / or had
16 access to a shower for about a week.

17 16. I have not received any psych medication since my
18 incarceration. I've told staff here I need my medication

19 17. I can't sleep, I am experiencing memory loss, shift
20 of emotions, sometimes I feel angry, sometimes I am
21 okay. It is a range of emotions.

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 3rd day of Feb, 2023 in Los Angeles, California.

Printed name: X Jaime Garza-Ramirez


Exhibit 11

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Declaration of Heriberto Garcia 6553876

I, Heriberto Garcia, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:
2. I am currently in holding cell 209.
3. I have been in this holding cell for a while – the longest time from everyone else in this cell. I don’t know how long I’ve been here because when I ask about the time the deputies will give inaccurate times or make it confusing.
4. I arrived to jail, the IRC, on Feb 15, 2023, sometime in the morning.
5. I was supposed to go to court but was told I could not go because my Covid test was still being processed.
6. While at IRC, I was only seen by medical, not a mental health provider.
7. I have not had access to showers since my arrival.
8. I do not have a toothbrush or any hygiene materials and I would like that. I did request a toothbrush but was denied.
9. Prior to arriving to holding cell 209, I was at the IRC clinic.
10. I need ibuprofen for my back pain.
11. I don’t have a blanket but I have asked for one. I have not received anything. It is cold in here.
12. I told deputies every time they walked by that I had court today, but I still missed court.
13. At West Valley (in San Bernardino) I was tested for Covid and it was negative then.
14. I have noT been able to sleep because of the conditions – doors are constantly shut, it’s loud, and cold.

1 I declare under penalty of perjury of the laws of the State of California and
2 the United States that the foregoing is true and correct. Executed this 17th day of
3 February, 2023, in Los Angeles, California.

4
5 Heriberto Garcia
6

7 I, Marisol Dominguez-Ruiz, interviewed Mr. Garcia in the IRC on February
8 17, 2023, took notes and then wrote up his declaration, which is attached. I read
9 Mr. Garcia the declaration, he approved its contents and signed it. I have reviewed
10 this word-processed version of this declaration and declare that it accurately
11 reflects the content of the handwritten, signed version.

12 I declare under penalty of perjury of the laws of the State of California and
13 the United States that the foregoing is true and correct. February 24, 2023, in Los
14 Angeles, California.

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17 Marisol Dominguez-Ruiz
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1 Declaration of Heriberto Garcia, #6553876

2 I, Heriberto Garcia, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I am currently in holding cell 209.

6 3. I have been in this holding cell for a while - the longest
7 time from everyone else in this cell. I don't know how long
8 I've been here because when I ask about time the
9 deputies will give inaccurate times or make it confusing.

10 4. I arrived to jail, the IRC, on Feb 15, 2023 sometime in
11 the morning.

12 5. I was supposed to go to court but was told I could not go
13 because my covid test was still being processed

14 6. While at IRC I was only seen by medical not a mental health provider.

15 7. I have not had access to showers since my arrival.

16 8. I do not have a toothbrush or any hygiene materials
17 and I would like that. I did request a toothbrush but was denied.

18 9. Prior to arriving to holding cell 209, I was at the IRC clinic

19 10. I need ibuprofen for my back pain

20 11. I don't have a blanket but I have asked for one. I
21 have not received anything. It is cold in here.

22 12. I told deputies everytime ^{times} I walked by that I had court
23 today. but I still missed court.

24 13. At West Valley (in San Bernardino) I was tested for
25 covid and it was negative then.

26 14. I have not been able to sleep because of the conditions -
27 doors are constantly shut, its bad, and cold

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 17 day of 2, 2023 in Los Angeles, California.

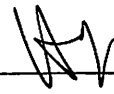
Printed name: 
Heriberto Goren.

Exhibit 12

Declaration of Christian E. Gonzalez 6549640

I, Christian E. Gonzalez, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. I am currently housed in MCJ 6050 – cell 1.

3. I was first arrested last Thursday, 2/9/23, around 7 am. By 8 am, I was taken to the police station on 3rd Street and Mednik. I was there from 2/9/23 until Tuesday 2/14/23.

4. During my time at the station I was allowed one shower and was fed the usual: peanut butter and jelly sandwiches.

5. On Tuesday 2/14/23 I went to court and was held in the holding cells from 7 am til about 5 pm.

6. Around 7 pm or 8 pm I was brought to the Inmate Reception Center on 2/14/23.

7. At IRC I was only asked if I was high and what I was using at the time of my arrest. They did not ask if I needed any other help. This check was done by medical.

8. At IRC, we waited in the medical area. There was no separation of people with mental health needs, people who felt suicidal. The only separation was by chairs. I did not sleep at the IRC because I did not feel comfortable sleeping on the floor, as that was the only way to sleep.

9. I was given toilet paper, just a few sheets, after a third, fourth or fifth request.

10. It was freezing cold in the IRC. I am pretty sure there was a freeze warning on Wednesday 2/15/23, but still not given a blanket. I could see blankets available but we were not given them because I was told that it is just processing, not housing. Channel 5 reported the freeze warning.

11. I was in the IRC for almost 42 hours.

1 12. Medical checked my blood pressure, she said it was high and told me
2 to drink water. I did not see the medical professional again after this. She never
3 looked me in the eyes to check on me.

4 13. I saw a psych person for about two minutes this morning around 2 am
5 on 2/16/23, right before being brought to my current cell. That's when I was asked
6 if I was high and what I was taking. That was the extent of a psych eval for me.

7 14. Today, 2/16/23 around 2 am I was transferred to MCJ-6050 medical
8 unit. I was told I was being moved because I had been at the IRC for a long time.

9 15. At one point, a supervisor saw me and said” “You're still here
10 homie.” He was surprised.

11 16. I had to ask a trustee for boxers otherwise I'd be without underwear.

12 17. The floor in IRC was dirty.

13 18. The talk with medical felt very routine – just in and out. No
14 individualized question to see my needs. I do think I need further help but no one
15 has asked me what type of help I need since my arrest.

16 19. I've never sought help but I would like it.

17 20. My last shower was on 2/14/23 during the booking process. I feel like
18 I smell. I told the person taking my declaration to keep some distance because I
19 feel like I smell due to no showers for a few days.

20
21 I declare under penalty of perjury of the laws of the State of California and
22 the United States that the foregoing is true and correct. Executed this 16th day of
23 February, 2023, in Los Angeles, California.

24
25 Christian Gonzalez

26
27 I, Marisol Dominguez-Ruiz, interviewed Mr. Gonzalez in the Men's Central
28 Jail 6050 on February 16, 2023, took notes and then wrote up his declaration,

1 which is attached. I read Mr. Gonzalez the declaration, he approved its contents
2 and signed it. I have reviewed this word-processed version of this declaration and
3 declare that it accurately reflects the content of the handwritten, signed version.

4 I declare under penalty of perjury of the laws of the State of California and
5 the United States that the foregoing is true and correct. February 24, 2023, in Los
6 Angeles, California.

7 

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9 Marisol Dominguez-Ruiz

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1 Declaration of Christian E. Gonzalez, Booking # 6549640

2 I, Christian E. Gonzalez, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I am currently housed in MCJ 6050 - cell 1.

6 3. I was first arrested last Thursday, 2/9/23, around 7am.
7 By 8am, I was taken to the police station on 3rd street and
8 Mednik. I was there from 2/9/23 until Tuesday 2/14/23.

9 4. During my time at the station I was allowed one shower
10 and was fed. meals: peanut butter & jelly sandwiches.

11 5. On Tuesday 2/14/23 I went to court and ^{was} held in the
12 holding cells from 7am til about 5pm.

13 6. Around 7pm or 8pm I was brought to the Intake Reception
14 center, on 2/14/23.

15 7. At IRC I was only asked if I was high and what I was
16 using at the time of my arrest. They did not ask if I needed
17 any other help. This check was done by medical.

18 8. At IRC, we waited in the medical area. There was no separation
19 of people with mental health needs, people who felt suicidal. The
20 only separation was by chairs. I did not sleep at the IRC because
21 I did not feel comfortable sleeping on the floor, as that was the
22 only way to sleep.

23 9. I was given toilet paper, just a few sheets, after a third,
24 fourth or fifth request.

25 10. It was freezing cold in the IRC. I am pretty sure
26 there was a freeze warnings on Wednesday, 2/15/23. but still not
27 given a blanket. I could see blankets available but we were
28 not given them because I was told that it is just processing,
not housing. channel 5 reported the freeze warning

1 11. I was in the IRC for almost 42 hours.

2 12. Medical checked my blood pressure, she said it was high
3 and told me to drink water. I did not see the medical
4 professional again after this. She never looked me in the eyes to check on me.

5 13. I saw a psych person for about two minutes this morning
6 around 2 AM on 2/16/23, right before being brought
7 to my current cell. That's when I was asked if I
8 was high and what was I taking. That was the
9 extent of a psych eval for me.

10 14. Today, ~~2/16/23~~ ^{2/16/23} around 2 AM ^{cg} I was transferred to MCJ-6050
11 medical unit. I was told I was being moved because
12 I had been at the IRC for ~~the~~ a long time.

13 15. At one point, a supervisor saw me and said: "You're
14 still here ~~in~~ ^{cg} ~~the~~ ^{cg} ~~unit~~ ^{cg}." He was surprised.

15 16. I had to ask a trustee for boxers otherwise I'd be
16 without underwear.

17 17. The floor in IRC ~~is~~ was dirty.

18 18. The talk w/ medical felt very routine - just in and out.

19 ~~not~~ individualized questions to see my needs. I do think
20 I need further help but no one has asked me
21 what type of help I need since my arrest.

22 19. I've never sought help but I would like it.

23 20. My last shower was on 2/14/23 ~~and~~ during the booking process.

24 I feel like I smell. I told the person taking my declaration
25 to keep some distance because I feel like I smell due to
26 no showers for a few days.

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 16 day of Feb, 2023 in Los Angeles, California.


Printed name:  _____
CHRISTIAN
GONZALEZ

Exhibit 13

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Declaration of Sergio Huerta 6549564

I, Sergio Huerta, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:
2. I am currently housed in MCJ 6050, cell 1.
3. I was arrested last week on Thursday, 2/9/23 around 12:50 am.
4. I was at the police station on Broadway and 77th. I was there until Tuesday, 2/14/23. I was not allowed out of my cell – not even to shower. I did get fed.
5. On 2/14/23, I was taken to court. Around 6 pm I was brought to the Inmate Reception Center (IRC).
6. While I was at IRC I was held in the medical waiting room since that Tuesday, 2/14/23. While at IRC, I slept on the floor. Everyone took turns on the floor. I was not provided a blanket because I was told it was temporary even though I could see blankets available.
7. In IRC, I was not given access to shower. For food, I was only given peanut butter and jelly sandwiches. The food comes in a see through plastic bag, 1 piece of bread, peanut butter pack, jelly pack, and two cookies.
8. I had to ask for toilet paper at IRC.
9. While at IRC, I did not get seen by a psych or any mental health evaluation.
10. I told them (the medical team) that I have a diagnosis and it should be in the Exodus system the jail uses. When I am in the community I take my medication.
11. I don't know my official diagnosis but I do suffer from anxiety, depression, and hearing voices. It might be PTSD.
12. I do know I am getting some type of medication but I don't know what it is for. I get pills twice a day.

1 13. I should be in a detoxing unit but instead I am in 6050 clinic.

2 14. The phones do not work here in MCJ 6050.

3 15. Today at 2 am, I was transferred from the IRC to MCJ 6050 –
4 medical. I was told that because I was one of the people who was at IRC the
5 longest I would be transferred to MCJ-6050.

6 16. I was in IRC for over forty-eight hours.

7 17. I was not provided with a trashcan in this cell. I created one with the
8 plastic bags that they bring lunch in.

9
10 I declare under penalty of perjury of the laws of the State of California and
11 the United States that the foregoing is true and correct. Executed this 16th day of
12 February, 2023, in Los Angeles, California.

13
14 Sergio Huerta
15

16 I, Marisol Dominguez-Ruiz, interviewed Mr. Huerta in Men's Central Jail
17 6050 on February 16, 2023, took notes and then wrote up his declaration, which is
18 attached. I read Mr. Huerta the declaration, he approved its contents and signed it.
19 I have reviewed this word-processed version of this declaration and declare that it
20 accurately reflects the content of the handwritten, signed version.

21 I declare under penalty of perjury of the laws of the State of California and
22 the United States that the foregoing is true and correct. February 24, 2023, in Los
23 Angeles, California.

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26 Marisol Dominguez-Ruiz
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1 Declaration of Sergio Huerta, Booking # 6549564

2 I, Sergio Huerta, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I am currently housed in MCJ 6050, cell 1.

6 3. I was arrested last week on Thursday, 2/9/23, around 12:50 am.

7 4. I was at the police station on Broadway and 77th. I was there
8 until Tuesday, 2/14/23. I was not allowed ^{out} of my cell - not even
9 to shower. I did get fed.

10 5. On 2/14/23, I was taken to court. Around 6pm I was brought
11 to the Inmate Reception Center (IRC).

12 6. While I was at IRC I was held in the medical waiting room
13 since that Tuesday, 2/14/23. While at IRC, I slept on the floor.
14 Everyone took turns on the floor. I was not provided a blanket
15 because I was told it was temporary even though I could
16 see blankets available.

17 7. In IRC, I was not given access to shower. For food, I was
18 only given peanut butter & jelly sandwiches. The food comes in
19 a see through plastic bag, 1 piece of bread, peanut butter pack, jelly
20 pack, and two cookies.

21 8. I had to ask for toilet paper at IRC.

22 9. While at IRC, I did not ^{SH} get seen by a psych or any mental
23 health evaluation.

24 10. I told them (the medical team) that I have a diagnosis and I
25 should be in the Echos system the jail uses. When I am in the
26 community I take my ^{SH} medication.

27 11. I don't know my official diagnosis but I do suffer from
28 anxiety, depression, and hearing voices. It might be PTSD.

1 12. I do know I am getting some type of medication but I
2 dont what it is for. I get pills twice a day

3 13. I should be in a detoxing unit but instead I am
4 in 6050 clinic.

5 14. The phones do not work here in MCJ 6050.

6 15. Today at 2am, I was transferred from the IRC to
7 MCJ 6050 - medical. I was told that because I was one
8 of the people who was at IRC the longest I would be
9 transferred to MCJ - 6050.

10 16. I was in IRC for over forty-eight hours.

11 17. ~~I~~ I was not provided with a trash can in this cell. I
12 created one with the plastic bags that they bring lunch in.

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 16 day of Feb, 2023 in Los Angeles, California.


x 
Printed name: x Huerta Sergio

Exhibit 14

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Declaration of Marvin Irvin 6550382

I, Marvin Irvin, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. My booking number is 6550382.

3. I was arrested at 4:00 am on Friday Feb. 10. I was taken to 77th Street jail.

4. While I was there in the jail I received a low dose of Zoloft and Remeron. I usually take these medications in the community, but I hadn't been on them for a couple months before the arrest. I wasn't in a stable housing situation, so it was hard to stay on my prescriptions.

5. On Wednesday I went to court. The court set a high bail.

6. I was brought to IRC on a full bus. We got here around 7:00 pm on Wednesday.

7. I was able to shower but there was no soap in the shower.

8. Once I got into the clinic area it was cold and crowded. I suffer from arthritis so it was hard to try and sleep scrunched up on chairs and benches.

9. I was not offered and did not get a mattress or a blanket.

10. I have not gotten any sleep since I've been here.

11. On Thursday it was crowded. I saw some people get burritos for dinner, but I only got peanut butter and jelly. Most of the people with me in the clinic only got peanut butter and jelly. I was frustrated I did not get a real dinner.

12. They did not give me the Remeron and Zoloft in IRC. Tuesday the 14th was the last time I took those medications.

13. I think I am experiencing side effects from being off the medications. The lights look a little brighter. I am watching out for side effects because I've experienced them before in times I've gone off of my medications.

14. Augusta Hawkins or Exodus urgent care are my prescribers in the

1 community as well as other hospitals.

2 15. The last time I was in LA County Jail was about five years ago. I
3 think I was in Twin Towers.

4 16. In the IRC I thought I was clear for housing but today – Friday – they
5 told me I was waiting for mental health.

6 17. Yesterday and today I saw minor fights between people, like people
7 throwing sandwiches at each other. Earlier today I saw someone throw a carton at
8 someone else. Deputies displayed a taser and then took him out of IRC.

9 18. I talked to mental health staff about my medication. I thought I would
10 start my medication on Thursday, but I haven't yet.

11 19. At around 12:10 pm today, while I was talking with Melissa, the
12 ACLU attorney, I heard my name called over the intercom. Then I was escorted to
13 another area. Melissa continued interviewing me there.

14 20. I am excited to get out of the situation in the IRC clinic.

15 21. I know once I get my medication and a bed I'll be able to sleep some.

16 22. It's better up here because there's less confrontation.

17 23. I have anxiety, PTSD, chronic schizophrenia, and depression.

18

19 I declare under penalty of perjury of the laws of the State of California and
20 the United States that the foregoing is true and correct. Executed this 17th day of
21 February, 2023, in Los Angeles, California.

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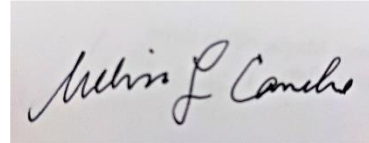
Marvin Irvin

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25 I, Melissa Camacho, interviewed Mr. Irvin in the IRC Clinic and IRC 231 on
26 February 17, 2023, took notes and then wrote up his declaration, which is attached.
27 I read Mr. Irvin the declaration, he approved its contents and signed it. I have
28 reviewed this word-processed version of this declaration and declare that it

1 accurately reflects the content of the handwritten, signed version.

2 I declare under penalty of perjury of the laws of the State of California and
3 the United States that the foregoing is true and correct. Executed February 24,
4 2023, in Los Angeles, California.

5 A rectangular box containing a handwritten signature in cursive script that reads "Melissa Camacho".

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7 Melissa Camacho
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1 Declaration of Marvin Irvin 6550382

2 I, Marvin Irvin, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. My booking number is 6550382.

6 3. I was arrested at 4:00 am on Friday Feb. 10. I
7 was taken to 7th Street jail.

8 4. While I was there in the jail I received a low dose of
9 Zoloft and Remeron. I usually take these medications in
10 the community, but I hadn't been on them for a couple months
11 before the arrest. I wasn't in a stable housing situation, so
12 it was hard to stay on my prescriptions.

13 5. On Wednesday I went to court. The court set a high
14 bail.

15 6. I was brought to IRC on a full bus. We got here around
16 7:00 pm on Wednesday.

17 7. I was able to shower but there was no soap in
18 the shower.

19 8. Once I got into the clinic area it was cold and
20 crowded. I suffer from arthritis so it was hard to
21 try and sleep scrunched up on chairs and benches.

22 9. I was not offered and did not get a mattress
23 or a blanket.

24 10. I have not gotten any sleep since I've been here.

25 11. On Thursday it was crowded. I saw some people get
26 burritos for dinner, but I only got peanut butter and
27 jelly. Most of the people with me in the clinic only
28 got peanut butter ^{and jelly}. I was frustrated I did not get
used

1 a real dinner.

2 12. They did not give me the Remeron and Zoloff in IRC.
3 Tuesday the 14th was the last time I took those
4 medications.

5 13. I think I am experiencing side effects from being
6 off of the medications. The lights look a little
7 brighter. I am watching out for side effects because
8 I've experienced them before in times I've gone off
9 of my medications.

10 14. Augusta Hawkins or Exodus Urgent Care are my
11 prescribers in the community as well as other hospitals.

12 15. The last time I was in LA County Jail was
13 about five years ago. I think I was in Twin Towers.

14 16. In the IRC I thought I was clear for housing
15 but today - Friday - they told me I was waiting
16 for mental health.

17 17. Yesterday and today I saw minor fights
18 between people, like people throwing sandwiches at
19 each other. Earlier today I saw someone throw
20 a carton at someone else. Deputies ~~then~~ displayed a
21 taser and then took him out of IRC.

22 18. I talked to mental health staff about my medication.
23 I thought I would start my medication on Thursday,
24 but I haven't yet. ~~I~~

25 19. At around 12:00 pm today, while I was talking
26 with Melissa, the ACLU attorney, I heard my
27 name called over the intercom. Then I was
28 escorted to another area. Melissa continued
interviewing me there.

1 20. I am excited to get out of the situation in
2 the IRC Clinic.

3 21. I know once I get my medication and a
4 bed I'll be able to sleep some.

5 22. It's better up here because there's less
6 confrontation.

7 23. I have anxiety, PTSD, chronic schizophrenia, and depression.
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22 I declare under penalty of perjury of the laws of the State of California and the United
23 States that the foregoing is true and correct. Executed this 17th day of February, 2023 in Los
24 Angeles, California.

25
26 Printed name: Marvin, Elvin
Marvin Irvin
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Exhibit 15

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Declaration of Jonah Jones 6552896

I, Jonah Jones, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:
2. Came to IRC on Thursday about 5 am. I was arrested and taken to 77th police station after I was arrested for a parole violation.
3. When I came to IRC, I was put in cell no. 36 for three hours before I went to court in Compton.
4. Came back from court about 11 am on Thursday.
5. When I returned from court, I got jail clothes and saw someone who asked me screening questions at the processing booths in IRC.
6. I told them I was taking Haldol. I have been diagnosed for bipolar and schizophrenia. Haldol helps keep me calm. I also take a drug for insomnia but I do not remember the name. I told them I get the meds from my doctor at Augusta Hawkins in Watts near MLK Hospital.
7. Despite my asking, I have not gotten my meds. I have been told I can't get meds till I see a psychiatrist. They have not told me why I have not gotten out of IRC into permanent housing.
8. I was in jail about 3-6 months ago. I went from IRC to Wayside. I told them I needed Haldol and sleeping meds but I never got them. I was in Wayside for about 3 months. I never saw a psychiatrist the whole time I was in jail.

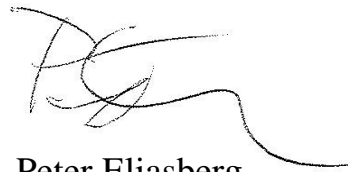
I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 17th day of February, 2023, in Los Angeles, California.

Jonah Jones

1 I, Peter Eliasberg, interviewed Mr. Jones in the IRC on February 17, 2023,
2 took notes and then wrote up his declaration, which is attached. I read Mr. Jones
3 the declaration, he approved its contents and signed it. I have reviewed this word-
4 processed version of this declaration and declare that it accurately reflects the
5 content of the handwritten, signed version.

6 I declare under penalty of perjury of the laws of the State of California and
7 the United States that the foregoing is true and correct. Executed February 24,
8 2023, in Los Angeles, California.

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Peter Eliasberg

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Declaration of Jonah Jones 6552896

I, Jonah Jones, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. Came to IRL on Thursday about 5am. I was arrested and taken to 77th police station after I was arrested for a parole violation.

3) When I came to IRL, I was put in cell no. 26 for three hours before I went to court in Compton.

4) Came back from court about 11am on Thursday.

5) When I returned from court, I got jail clothes + saw someone who asked me screening questions at the processing booth in IRL

6) I told them I was taking Maldol. ~~for~~ I have been diagnosed for bipolar + schizophrenia. Maldol helps keep me calm. I also take a drug for insomnia but I do not remember the name.

1 I told them I get the meds
2 from my doctor at Augusta
3 Hawkins in Watts near MLK
4 Hospital.

6 b) Despite my asking, I have
7 not gotten my meds. nor I
8 have been told I can't get
9 meds till I see a psychiatrist.
10 They have not told me why
11 I have not gotten out of
12 ICE into permanent housing.

14 ~~If I was~~ I was in jail
15 about 3-4 months ago.
16 I went from ICE to
17 Wayside. I told them I
18 needed Haldol and sleeping
19 meds but I never got them
20 I was in Wayside for about
21 3 months. I ~~did~~ never
22 ~~psych~~ saw a psychiatrist
23 the whole time I was in
24 jail.

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 17 day of February, 2023 in Los Angeles, California.


Printed name: 
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Exhibit 16

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Declaration of John Stephen Mayes 6540629

I, John Stephen Mayes, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:
2. I am currently housed in IRC 231 – E Pod.
3. I was arrested on Friday, 2/10/23, around 8 pm. I was finally brought to the Inmate Reception Center (IRC) on Wednesday, 2/15/23, around 5/6 pm.
4. I was at the IRC medical holding area for over 24 hours.
5. Sometime around late last night (2/16/23) and early this morning (2/17/23) I was brought to my current holding cell.
6. While I was in IRC clinic I slept on the floor and on broken chairs.
7. It was very cold and uncomfortable. I was not issued a blanket.
8. The food at IRC was bad – all we had was peanut butter and jelly sandwiches. We received lunch around 3:20 pm after we had been shouting we were hungry.
9. For dinner, the deputies, about 10 to 15 deputies, forced us into a room so we could get our dinner. The whole experience was intimidating – the deputies had a paintball gun and smoke grenade and vest.
10. Since arriving, I have not been seen by a mental health provider. I was told that I need to be seen by a mental health provider so I can get housing.
11. In the past I have participated in mental health diversion programs.
12. At one point I have been diagnosed with schizophrenia but Exodus. I was prescribed 100 mgs of Trazadone.
13. I don't take medication.
14. While I'm here in jail I would like to receive medication to help with anxiety and depression. It is an intense situation and medication would help.
15. While I was at IRC, I only saw pill call completed once and that was after the intense dinner distribution scenario.

1 16. After I was brought to IRC-231 E-Pod, I was taken to court and then
2 brought back to IRC-231 E-Pod.

3 17. I had been here for about 10 minutes when I saw the ACLU
4 representative, who I met yesterday, while I was at the IRC clinic area. The ACLU
5 representative, Marisol Dominguez-Ruiz, is the same person who is taking my
6 declaration.

7 18. At IRC, I saw someone on the front bench who tightened his
8 handcuffs to the point of his arms turning red. He was sort of pushing himself off.

9 19. At IRC clinic, I saw one detainee throw things at another detainee and
10 the deputies did nothing, even though they saw everything.

11

12 I declare under penalty of perjury of the laws of the State of California and
13 the United States that the foregoing is true and correct. Executed this 19th day of
14 February, 2023, in Los Angeles, California.

15

16

John Mayes

17

18 I, Marisol Dominguez-Ruiz, interviewed Mr. Mayes in the IRC on February
19 19, 2023, took notes and then wrote up his declaration, which is attached. I read
20 Mr. Mayes the declaration, he approved its contents and signed it. I have reviewed
21 this word-processed version of this declaration and declare that it accurately
22 reflects the content of the handwritten, signed version.

23

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25

I declare under penalty of perjury of the laws of the State of California and
the United States that the foregoing is true and correct. February 24, 2023, in Los
Angeles, California.

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28



Marisol Dominguez-Ruiz

1 Declaration of John Stephen Mayes, Booking # 6540629

2 I, John Stephen Mayes, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I am currently housed in IRC 231 - E Pad.

6 3. I was arrested on Friday, 2/10/23, around 8pm. I was
7 finally brought to the Inmate Reception Center (IRC) on
8 wednesday, 2/15/23, around 5/6pm.

9 4. I was at the IRC medical holding area for over
10 24 hours.

11 5. Sometime around late last night (2/16/23) and early this
12 morning (2/17/23) I was brought to my current holding cell.

13 6. While I was in IRC clinic I slept on the floor and on broken
14 chairs.

15 7. It was very cold and uncomfortable. I was not issued a
16 blanket.

17 8. The food at IRC was bad - all we had was peanut butter and
18 jelly sandwiches. We received lunch around 3:20pm after
19 we had been shouting we were hungry.

20 9. For dinner, the deputies, about 10 to 15 deputies, forced us into
21 a room so we could get our dinner. The whole experience was
22 intimidating - the deputies had a paintball gun and smoke grenade and vest

23 10. Since arriving, I have not been seen ~~any~~ by a mental health
24 provider. I was told that I need to be seen by a mental
25 health provider so I can get housing.

26 11. In the past I have ~~been~~ participated in mental health
27 diversion programs.

28 12. At one point I have been diagnosed with schizophrenia. by Exodus
I was ~~also~~ prescribed 100mg of trazadone.

1 13. I don't take medication

2 14. While I'm here in jail I would like to receive medication to
3 help with anxiety and depression. It is an intense situation and
4 medication would help.

5 15. While I was at IRC, I only saw pill call completed once
6 and that was after the intense dinner distribution scenario.

7 16. After I was brought to IRC-231 E-Pod, I was taken to
8 court and then brought back to IRC-231 E-Pod.

9 17. I had been here for ~10 minutes when I saw the ACLU
10 representative, who I met yesterday, while I was at
11 the IRC clinic area. The ACLU representative, Mansol
12 Dominguez-Ruiz, is the same person who is taking my declaration.

13 18. At IRC, I saw someone on the front bench who tightened
14 his handcuffs to the point of his arms were turning red. He
15 was sort of pushing himself off.

16 19. At IRC clinic, I saw one detainee throw things at another
17 detainee and the deputies did nothing, even though they
18 saw everything.

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 17 day of Feb, 2023 in Los Angeles, California.

Printed name: John Mayes
J. Mayes

Exhibit 17

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Declaration of Shauntee Rodgers 6477945

I, Shauntee Rodgers, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:
2. My booking number is 6477945.
3. I was at court on October 6, 2022. I was brought from court to IRC around 8 pm.
4. I went through the booking process. I took a shower, but there was no soap in the shower.
5. I had a chest x-ray and then was brought to a cell. I think I was put in the cell between 10:30 and 11 pm.
6. When I first arrived, there were four people in the cell. For the last five or six hours I have been the only person in the cell.
7. To try to sleep at night I laid down on the metal bench and put my shirt on my face. I have slept for only 3 or 4 hours.
8. This morning I was given food at 4:00 am. They did not feed me again until 12:40 pm.
9. No one has told me why I am waiting.
10. I have not been able to use the phone because there is no phone in this cell.

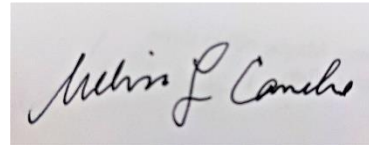
I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 7th day of October 2022, in Los Angeles, California.

Shauntee Rodgers

I, Melissa Camacho, interviewed Mr. Rodgers in the IRC on October 7,

1 2022, took notes and then wrote up his declaration, which is attached. I read Mr.
2 Rodgers the declaration, he approved its contents and signed it. I have reviewed
3 this word-processed version of this declaration and declare that it accurately
4 reflects the content of the handwritten, signed version.

5 I declare under penalty of perjury of the laws of the State of California and
6 the United States that the foregoing is true and correct. Executed February 24,
7 2023, in Los Angeles, California.

8 A rectangular box containing a handwritten signature in black ink that reads "Melissa Camacho".

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10 Melissa Camacho
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1 Declaration of Rodgers, Shauntee 6477945

2 I, Shauntee Rodgers, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. My booking number is 6477945.

6 3. I was at court on October 6, 2022. I was
7 brought from Court to IRC around 8:00 pm.

8 4. I went through the booking process. I took a
9 shower, but there was no soap in the shower.

10 5. I had a chest X-Ray and then was brought to
11 a cell. I think I was put in the cell between 10:30 and 11 pm.

12 6. When I first arrived, there were four people in
13 the cell. For the last five or six hours I have been
14 the only person in the cell.

15 7. To try to sleep at night I laid down on the metal
16 bench and put my shirt on my face. I have slept for
17 only 3 or 4 hours.

18 8. This morning I was given food at 4:00 am. They
19 did not feed me again until 12:45 pm.

20 9. No one has told me why I am waiting.

21 10. I have not been able to use the phone because there
22 is no phone in this cell.

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Exhibit 18

Declaration of Erick Scoby 6476943

I, Erick Scoby, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. Arrested in Los Angeles and came to jail from police station about October 4, 2022.

3. I entered IRC approximately October 6, 2022.

4. I have been diagnosed with PTSD, bipolar, depression, schizoaffective disorder, and anxiety.

5. When I was arrested I was taking Benadryl to help with my insomnia, Buspirone for anxiety and Seroquel for psychosis.

6. When I was processed into IRC I told a doctor I was taking all the drugs above in the community and told them I needed to keep taking my meds. Doctor told me doctor could not give me meds till I got into permanent housing and saw a psychiatrist. I kept telling him I needed my meds but doctor said I'd have to wait.

7. I tried to deal with effects of not taking meds as best I could. I started having visions and hearing voices saying my name. My mind was racing and couldn't control my thoughts.

8. I was previously in LA county jail. When I was there before I got meds. So I think they have a record that I take psych meds.

9. My best recollection is I stayed in IRC for a day to a couple of days. Then I was transferred to MCJ 5300 where I am currently housed.

10. I did not get any meds till November 19. I only got meds after I told a judge I needed meds and wasn't getting them. The judge issued a court order for me to get a medical evaluation. Only after the court order did I get my meds.

11. I suffered terribly until I got my meds.

12. I have seen other people in my dorm who tell me they are not getting

1 meds and some of them are really disturbed.

2

3 I declare under penalty of perjury of the laws of the State of California and
4 the United States that the foregoing is true and correct. Executed this 8th day of
5 December, 2022, in Los Angeles, California.

6

7

Erick Scoby

8

9 I, Peter Eliasberg, interviewed Mr. Scoby in Men's Central Jail on December
10 8, 2022, took notes and then wrote up his declaration, which is attached. I read Mr.
11 Scoby the declaration, he approved its contents and signed it. I have reviewed this
12 word-processed version of this declaration and declare that it accurately reflects the
13 content of the handwritten, signed version.

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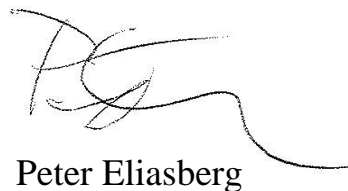
I declare under penalty of perjury of the laws of the State of California and
the United States that the foregoing is true and correct. Executed February 24,
2023, in Los Angeles, California.

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Peter Eliasberg

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1 Declaration of Erick Scoby 6476943

2 I, Erick Scoby, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. Arrested in LA Angeles and came
6 to jail from police station about Oct. 4 2021

7 3. I Entered IRC approximately Oct 6, 2022

8 4. I have been diagnosed with
9 PTSD, bipolar, depression + trigia
10 affective disorder and anxiety

11 5. When I was arrested ²⁰²¹ taking
12 benadryl to help with my insomnia
13 Bupropion for anxiety and Serquel
14 for psychosis

15 5. When I was processed into IRC
16 I told a doctor I was taking
17 all the drugs above in the

18 community + told them I needed
19 to keep taking my meds. Doctor
20 told me ~~doctor~~ would not give
21 me meds till I got into permanent
22 housing and saw a psychiatrist. I kept
23 telling him I needed my meds
24 but doctor said I'd have to
25 wait.

26 5/ I tried to deal with effects of
27 not taking meds as best I
28 could. I started having visions
+ hearing voices saying my name

1 My mind was racing & couldn't
2 control my thoughts.

3
4 6) I was previously in LA County
5 jail. When I was there before
6 I got meds. So I think they
7 have a record that I take
8 psych meds.

9
10 7) My best recollection is I
11 stayed in IRC for a day to
12 a couple of days. Then
13 I was transferred to MCJ 5300
14 where I am currently housed

15 8) I did not get my meds till
16 November 19. I only got meds
17 after I told a judge I needed
18 meds & wasn't getting them.
19 The judge issued a court order
20 for me to get a medical evaluation.
21 Only then did I get my meds
after the court order

22 9) I suffered terribly until I got
23 my meds

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25 10) I have seen other people
26 in my dorm who tell me they
27 are not getting meds & some
28 of them are really disturbed

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 8th day of Dec, 2022 in Los Angeles, California.

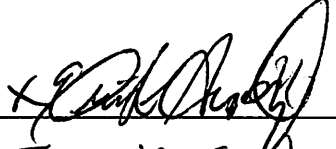
Printed name: 
Eric S. Jones

Exhibit 19

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Declaration of Kevin Scott 6540334

I, Kevin Scott, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. My booking number is 6540334.

3. I am currently housed in IRC 231 in a single cell.

4. I have been diagnosed with depression and anxiety and agoraphobia.

5. I am concerned I may have to be diagnosed with other mental illnesses. I also hear voices.

6. In the community I take Prozac at 40 mg per day at morning. I take Buspar, 10 mg twice per day at morning and dinner. I take Vistaril 25 mg 3 times per day.

7. I was arrested in Hawthorne on January 20, 2023.

8. The last time I took my medicine was January 19, 2023.

9. I was in a cell near the IRC clinic for about two days. I was in the same cell the whole time.

10. I did not have a mattress or a blanket.

11. I was in the cell by myself.

12. After about two days, mental health talked to me at the front of the cell.

13. I told them the medications I am taking, the dosage, the time of day and that I get it through POC. POC is the mental health provider through parole.

14. I always get medication when I'm in jail.

15. Mental health did not tell me when I would get my medication.

16. About 12 hours later, I was taken to IRC 231.

17. I have been in IRC for about 10 days.

18. I haven't spoken to anyone from mental health here.

19. I believe I am here because they are waiting for a space to open up for

1 me somewhere else.

2 20. I have had one shower since coming to IRC 231.

3 21. My anxiety is going through the roof. Everything is a negative
4 thought. I feel like I'm not going to be alright. My mind is going a million miles an
5 hour. I'm hearing voices.

6 22. My brother died 3 weeks ago, and I feel like the voices are fueling my
7 anxiety and depression. I feel hopeless and like everything is going to go wrong.

8 23. I still have not been given any of my medication.

9 24. I have been to court twice since I've been here.

10

11 I declare under penalty of perjury of the laws of the State of California and
12 the United States that the foregoing is true and correct. Executed this 3rd day of
13 February, 2023, in Los Angeles, California.

14

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Kevin Scott

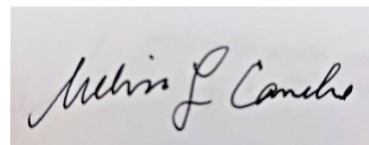
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17 I, Melissa Camacho, interviewed Mr. Scott in the IRC 231 on February 3,
18 2023, took notes and then wrote up his declaration, which is attached. I read Mr.
19 Scott the declaration, he approved its contents and signed it. I have reviewed this
20 word-processed version of this declaration and declare that it accurately reflects the
21 content of the handwritten, signed version.

22 I declare under penalty of perjury of the laws of the State of California and
23 the United States that the foregoing is true and correct. Executed February 24,
24 2023, in Los Angeles, California.

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Melissa Camacho

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1 Declaration of Kevin Scott

2 I, Kevin Scott, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. My booking number is 6540334.

6 3. I am currently housed in IRC 231 in a single cell.

7 4. I have been diagnosed with depression and
8 anxiety and agoraphobia.

9 5. I am concerned I may have to be diagnosed
10 with other mental illnesses. I also hear voices.

11 6. In the community I take Prozac at 40 mg per
12 day in the morning. I take Bus Par, 10 mg twice
13 per day at morning and dinner. I take Vistaril 25 mg.
14 3 times per day.

15 7. I was arrested in Hawthorne on January 20, 2023.

16 8. The last time I took my medicine was January 19, 2023.

17 9. I was in a cell near the IRC clinic for about
18 two days. I was in the same cell the whole time.

19 10. I did not have a mattress or a blanket.

20 11. I was ⁱⁿ the cell by myself.

21 12. After about two days, mental health talked to me at the
22 front of the cell.

23 13. I told them the medications, ^{I am taking} the dosage, the time of
24 day and that I get it through POC. POC is the
25 mental health provider through Parole.

26 14. I always get medication when I'm in jail.

27 15. Mental health did not tell me when I would start
28 my medication.

- 1 16. About 12 hours later, I was taken to IRC 231.
- 2 17. I have been in IRC for ~~many~~ about 10 days.
- 3 18. I haven't spoken to anyone from mental health here.
- 4 19. I believe I am here because they are waiting for
- 5 a space to open up for me somewhere else.
- 6 20. I have had one shower since coming to IRC 231.
- 7 21. My anxiety is going through the roof. Everything is a
- 8 negative thought. I feel like I'm not going to be alright.
- 9 My mind is going a million miles an hour. I'm hearing voices.
- 10 22. My brother died 3 weeks ago, and I feel like the voices
- 11 are feeling my anxiety and depression. I feel hopeless and
- 12 like everything is going to go wrong.
- 13 23. I still have not been given any of my medication.
- 14 24. I have been to court twice since I've been here.

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 3 day of February 2023 in Los Angeles, California.

Printed name: Kevin Scott
Kevin Scott

Exhibit 20

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Declaration of Paul Silvas 6534332

I, Paul Silvas, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. I was arrested on about January 13, 2023, in Norwalk for violating a restraining order. When I was arrested I was on heroin and meth. I was hallucinating when I came to jail but they did not give me anything to help detox.

3. Before my arrest, I was taking Remeron, I think 45 mg and 15 mg Buspiron[e]. I take them for depression, anxiety and insomnia.

4. Since I have been in Twin Towers 242 I have twice told a clinician I take meds in the community and I really need them. But I still have not gotten my meds.

5. Without my meds, my anxiety ramps up. I feel very stressed. My depression has increased and I cannot sleep. I also have been getting brain zaps.

6. This has happened to me before. I was arrested and jailed a few months ago and it took at least a month for me to get my Remeron in the jail. I told them I have also been on Buspirone, but I never got it.

7. Right now I am in 242 pod in Twin Towers. I have been told this is temporary housing and they are going to move me to permanent housing but I do not know when.

8. I am on suicide watch and have to wear a suicide gown. They won't even give me a pencil because they say I might hurt myself. But they still won't give me my medication.


I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 3rd day of February, 2023, in Los Angeles, California.

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Paul Silvas

I, Peter Eliasberg, interviewed Mr. Silvas in the IRC on February 3, 2023, took notes and then wrote up his declaration, which is attached. I read Mr. Silvas the declaration, he approved its contents and signed it. I have reviewed this word-processed version of this declaration and declare that it accurately reflects the content of the handwritten, signed version.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed February 24, 2023, in Los Angeles, California.



Peter Eliasberg

1 Declaration of Paul Silvas B/N 6534332

2 I, Paul Silvas, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I was arrested on about
6 January 13, 2023 in Norwalk
7 for violating a restraining order.
8 When I was arrested I was
9 on heroin + meth. I was
10 hallucinating when I came to
11 jail but they did not give
12 me anything to help detox.
13 Before my arrest,

14 3) I was taking prozac, I
15 think 45 mg + 15 mg
16 Prozac. I take them for
17 depression, anxiety + insomnia.

18 4) Since I have been in
19 Twin Towers 242 I have
20 twice told a clinician I
21 take meds in the community
22 + I really need them. But
23 I still have not gotten my
24 meds.

25 5) Without my meds, my anxiety
26 ramps up. I feel very stressed.
27 My depression has increased and
28 I cannot sleep. I also have
been getting brain zaps.

1 6) This has happened to
2 me before. I was
3 arrested and jailed a few
4 months ago and it took at
5 least a month for me to
6 get my Parson in the jail.
7 I told them I had also been
8 on Busparin, but I never
9 got it.

10
11 7) Right now in am in 242
12 pol in Twin Towers. I have
13 been told this is temporary
14 housing + they are going to
15 move me to permanent housing
16 but I do not know when.

17
18 8) I am on suicide watch and
19 have to wear a suicide gown.
20 They won't even give me a pencil
21 because they say I might hurt
22 myself. But they still when
23 give me my medication.
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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 3rd day of February, 2023 in Los Angeles, California.

Printed name: Paul Silvas
Paul Silvas

Exhibit 21

Declaration of Juan Manuel Tapia 6542462

I, Juan Manuel Tapia, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. I am currently housed in Men's Central Jail, dorm 5500.

3. I was arrested on January 27, 2023 and was transferred to the Inmate Reception Center on January 28, 2023.

4. While at the Inmate Reception Center, I underwent a mental health evaluation. I informed the staff that I have a mental health diagnosis and I take medication. I was told they would look into this to see if I could get my medication.

5. I am diagnosed with the following: posttraumatic stress disorder, depression, anxiety, and ADHD.

6. I was diagnosed with ADHD at age 13; at age 18 I was diagnosed with depression; and at 20 years old, I was diagnosed with PTSD and anxiety.

7. I am prescribed with Lexapro and Seroquel. I take 20 mgs of Lexapro (Escitalopram) and 50 mgs of Seroquel (Quetiapine). I take my medication consistently while I am in the community.

8. In the community, I also see a therapist at Wellnest, once a week, 1 hour each time. I've seen my therapist since April 2022.

9. Since my arrival at LA County Jail, I have not received my medication and have not received any psych/counseling services.

10. I did receive pain medication for my shoulder. I got in an altercation on January 29, 2023 due to a trigger of my PTSD and lack of medication. I felt anxious and nervous and got in altercation in which I hurt my shoulder.

11. I currently feel anxious, scared, depressed because I don't have my medication. At night I hear voices and have trouble falling asleep.

12. The last time I was in LACJ was in 2020 and I did not experience this

1 issue with my medication. I received my medication almost the next day.

2 13. The showers in my dorm are non-functional – the water is scalding
3 hot. Sometimes, not enough food is delivered to my dorm so not everyone gets a
4 meal.

5 14. My therapist in the community is Dr. Manny Hernandez.
6

7 I declare under penalty of perjury of the laws of the State of California and
8 the United States that the foregoing is true and correct. Executed this 10th day of
9 February, 2023, in Los Angeles, California.

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Juan Tapia

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I, Marisol Dominguez-Ruiz, interviewed Mr. Tapia in Men’s Central Jail on
February 10, 2023, took notes and then wrote up his declaration, which is attached.
I read Mr. Tapia the declaration, he approved its contents and signed it. I have
reviewed this word-processed version of this declaration and declare that it
accurately reflects the content of the handwritten, signed version.

I declare under penalty of perjury of the laws of the State of California and
the United States that the foregoing is true and correct. February 24, 2023, in Los
Angeles, California.



Marisol Dominguez-Ruiz

1 Declaration of Juan Manuel Tapia, Booking #6542462

2 I, Juan Manuel Tapia, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I am currently housed in Men's Central Jail, room 5500.

6 3. I was arrested on January 27, 2023 and was transferred to
7 the Inmate Reception Center on January 28, 2023.

8 4. While at the Inmate Reception Center, I underwent a mental
9 health evaluation. I informed the staff that I have a

10 mental health diagnosis and I take medication. I was told
11 they would like interviews to see if I could get my medication.

12 5. I am diagnosed with the following: posttraumatic stress
13 disorder, depression, anxiety and ADHD. JT

14 6. I was diagnosed with ADHD at age ~~10~~ 13; at 18 I was
15 diagnosed with depression; and at 20 years old, I was
16 diagnosed with PTSD and anxiety. JT

17 7. I am prescribed with Lexapro and Seroquel. I take 20 mgs
18 of Lexapro (escitalopram) and 50mgs of Seroquel (quetiapine). I take
19 my medication consistently while I am in the community.

20 8. In the community, I also see a therapist at Wellnest, once
21 a week, ~~for~~ 1 hour each time. I've seen my therapist since April 2022.

22 9. Since my arrival at LA County Jail, I have not received
23 my medication and have not received any psych/counseling
24 services.

25 10. I did receive pain medication for my shoulder. I got in an
26 altercation on January 29, 2023 due to a trigger of my
27 PTSD and lack of medication. I felt anxious and nervous
28 and got in altercation in which I hurt my shoulder.

JT

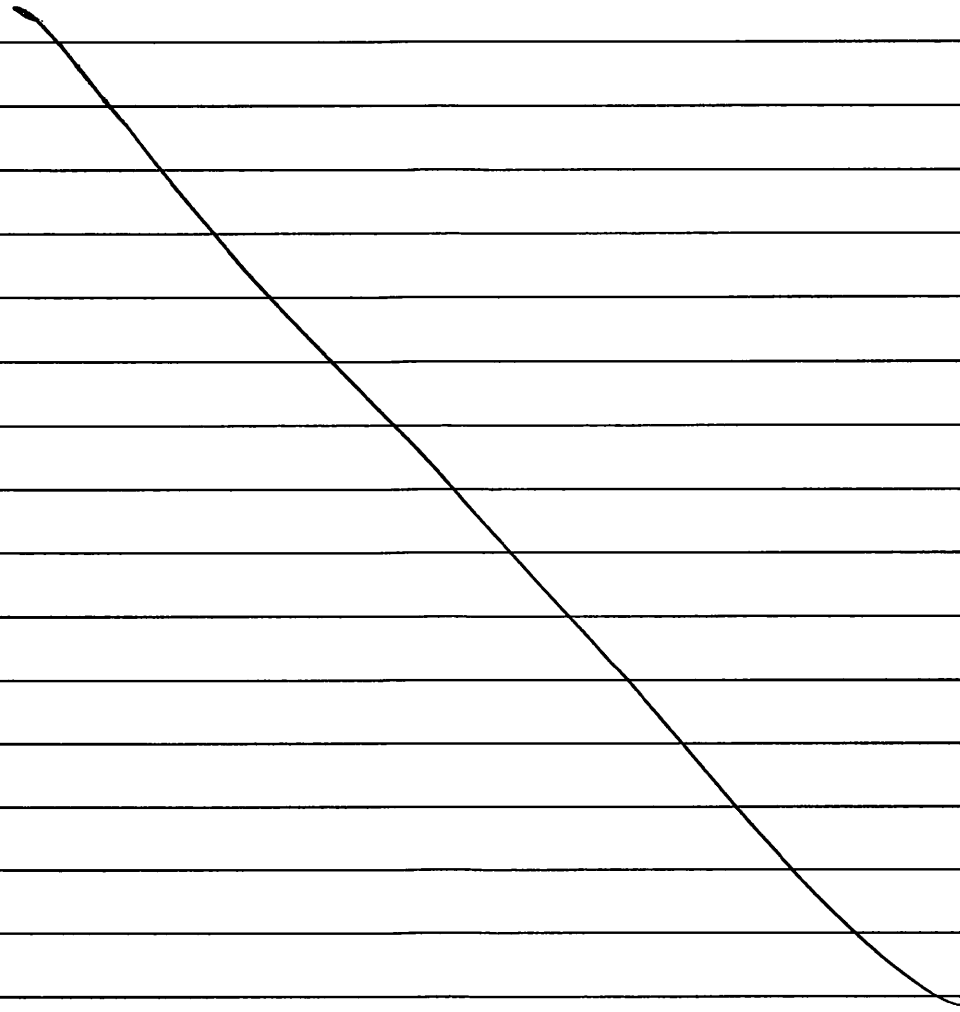
1 11. I currently feel anxious, scared, ~~depressed~~ depressed because
2 I don't have my medication. At night I hear voices and
3 have trouble falling asleep

4 12. The last time I was in LACTJ was in 2020 and I
5 did not experience this issue w/ my medication. I received
6 my medication almost the next day.

7 13. The showers in my dorm are non-functional: the water is
8 scalding hot. Sometimes, not enough food is delivered to my dorm
9 so not ~~each~~ everyone gets a meal.

10 14. My therapist in the community is DR. Manny Hernandez

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 10 day of 02, 2023 in Los Angeles, California.

Printed name: _____

X



Juan Tapia

Exhibit 22

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Declaration of Angel Vasquez 6553874

I, Angel Vasquez, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:
2. I am currently in holding cell 209.
3. I arrived to the IRC clinic on Wednesday, 2/15/23.
4. It feels like I have been in this holding cell for about two days. At one point I was in holding cell 208 and then switched to holding cell 209.
5. The last meal I received was around 3 am.
6. I am waiting for permanent housing. I have not been told when I'll be moved.
7. I have back pain but have not received any medicine for back pain.
8. I also have dental needs but nothing has been done about this.
9. I asked for a phone call but was told "no phones here" in the holding cell area.
10. I have a blanket but only because another detained person gave it to me. No one else in the holding cell has a blanket. It is cold in here. There are nine other people in the cell with me. There are no mattresses in the cell. If I want to sleep, I have to lay on the floor or a bench.
11. Any time I'm outside of the cell the deputies call us insulting names such as "stupid" or "bitches." These names are just the tip of the iceberg.
12. Downstairs at IRC is better than up here because at least we could use phones.
13. I was not seen by a mental health provider. I would like to see one. I am feeling anxious being in this cell.
14. I was seen by a medical provider. He told me I would be cleared for housing – at least he believed I'd have housing in a couple of hours – but I'm still here in this holding cell.

1 15. I can't even exercise in this cell because I don't want to smell.

2 16. Whenever I try to reach the deputies on intercom, I get ignored. To
3 get their attention, we have to say someone is having a heart attack.

4 17. No one has come to clean the holding cell. It's only sort of clean
5 because the guys inside have cleaned it.

6 18. The water fountain works but you have to put your mouth close to it.

7 19. I asked for a mask but was told to wait until the nurse pill call showed
8 up. "No masks up here."

9 20. I have not had access to a shower. Lips hurt because I don't have
10 chapstick. No hygiene materials have been provided. I only have access to some
11 communal toilet.

12

13 I declare under penalty of perjury of the laws of the State of California and
14 the United States that the foregoing is true and correct. Executed this 17th day of
15 February, 2023, in Los Angeles, California.

16

17

Angel Vasquez

18

19 I, Marisol Dominguez-Ruiz, interviewed Mr. Vasquez in the IRC on
20 February 17, 2023, took notes and then wrote up his declaration, which is attached.
21 I read Mr. Vasquez the declaration, he approved its contents and signed it. I have
22 reviewed this word-processed version of this declaration and declare that it
23 accurately reflects the content of the handwritten, signed version.

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1 I declare under penalty of perjury of the laws of the State of California and
2 the United States that the foregoing is true and correct. February 24, 2023, in Los
3 Angeles, California.

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6 Marisol Dominguez-Ruiz

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1 Declaration of Angel Vasquez, # 0553874

2 I, Angel Vasquez, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I am currently in holding cell 209.

6 3. I arrived to the IRC clinic on Wednesday, 2/15/23.

7 4. It feels like I have been in this holding cell for about
8 two days. At one point I was in holding cell 208 and
9 then switched to holding cell 209.

10 5. The last meal I received was around 3AM

11 6. I am waiting for permanent housing. I have not been
12 told when I'll be moved

13 7. I have back pain but have not received any medicine
14 for back pain

15 8. I also have dental needs but nothing has been about
16 this.

17 9. I asked for a phone call but was told "no phones here"
18 in the holding cell area.

19 10. I have a blanket but only because another detained person
20 gave it to me. No one else in the holding cell has a blanket.
21 It is cold in here. There are ~~ten~~ nine other people in the cell with me.
22 There are no mattresses in the cell. If I want to sleep, I
23 have to lay on the floor or a bench.

24 11. Any time I'm outside of the cell the deputies call us insulting
25 names such as "stupid" or "bitches." These names are
26 just the tip of the ice berg

27 12. Downstairs at IRC is better than up here because at least
28 we could use phones.

1 13. I was not seen by a mental health provider. I would like to
2 see one. I am feeling anxious ~~about~~ being in this cell.

3 14. I was seen by a medical provider. He told me I would
4 be cleared for holding - at least he believed I'd have
5 housing in a couple of hours - but I'm still here in this
6 holding cell.

7 15. I can't even exercise in this cell because I don't want
8 to smell.

9 16. Whenever I try to reach the deputies on intercom, ~~they~~ I get
10 ignored. To get their attention, we have to say someone is
11 having a heart attack.

12 17. No one has come to clean the holding cell. It's only sort
13 of clean because the guys inside have cleaned it.

14 18. The water fountain ~~knicks~~ but you have to put your math
15 close to it.

16 19. I asked for a mask but was told to wait until the
17 nurse pill call showed up. "no masks up here."

18 20. ~~we~~ I have not had access shower. Lips hurt because
19 I don't have chapstick. No hygiene materials have
20 been provided. ~~we~~ I only ~~have~~ have access to some
21 communal toilet.

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[A large, illegible handwritten signature or scribble is present across the top half of the page, starting from line 1 and extending down to line 21.]

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 17 day of FEB, 2023 in Los Angeles, California.

Printed name: Angel Vasquez
[Handwritten signature]

Exhibit 23

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Declaration of James Webb 6549978

I, James Webb, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:
2. I have been in holding cell 122 for almost three days.
3. I arrived to the IRC on Tuesday (2/14) or Monday (2/13).
4. I have not received a blanket.
5. I have not been allowed to make a phone call.
6. I had to ask for toilet paper. The toilet is working.
7. There are six people in the holding cell – no one has blankets.
8. It is very cold in the holding cell.
9. I asked to use the phone but I was told to wait.
10. I had surgery on Thursday, 2/9/23 because my ring finger on my right hand was injured. My bandage has not been changed since yesterday morning (2/15/23).
11. My bandaged finger hurts right now and feels itchy.
12. As I was doing this declaration with the ACLU representative, I finally received my lunch, at 3:30 pm. My previous meal was sometime in the AM.
13. I asked for a blanket but was denied because I was told this is not housing.
14. I have not been told when I'd be moved.
15. I have HIV which makes the need for clean bandages that much more important.
16. I am receiving my medicine for HIV – it's been done in a timely manner.
17. I have been seen my medical and mental health evaluations. And I am still here in the holding cell 122 holding cell even though I've done all the evaluations.

1 18. There are no mattresses.

2 19. The intercom doesn't work so if someone were to have a heart attack
3 we can't communicate. We need to yell to get their attention for help and for toilet.

4
5 I declare under penalty of perjury of the laws of the State of California and
6 the United States that the foregoing is true and correct. Executed this 16th day of
7 February, 2023, in Los Angeles, California.

8
9 James Webb

10

11 I, Marisol Dominguez-Ruiz, interviewed Mr. Webb in the IRC on February
12 16, 2023, took notes and then wrote up his declaration, which is attached. I read
13 Mr. Webb the declaration, he approved its contents and signed it. I have reviewed
14 this word-processed version of this declaration and declare that it accurately
15 reflects the content of the handwritten, signed version.

16 I declare under penalty of perjury of the laws of the State of California and
17 the United States that the foregoing is true and correct. February 24, 2023, in Los
18 Angeles, California.

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Marisol Dominguez-Ruiz

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1 Declaration of James Webb, Booking # 6549978

2 I, James Webb, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I have been in holding cell 122 for almost
6 three days.

7 3. I arrived to the IRC on Tuesday (2/14) or Monday (2/13).

8 4. I have not received a blanket.

9 5. I have not been allowed to make one phone call.

10 6. I had to ask for toilet paper. The toilet is working.

11 7. There are six people in the ~~cell~~ holding cell - no one has
12 blankets.

13 8. It is very cold in the holding cell.

14 9. I asked to use the phone but I was ~~asked~~ ^{told} to wait.

15 10. I had surgery on Thursday, 2/9/23 because my ring finger
16 on my right ^{hand} was injured. My bandage has not been
17 changed since yesterday morning (2/15/23).

18 11. My bandaged finger hurts right now and feels itchy.

19 12. As I was doing this declaration with the ACLU representative
20 I finally received my lunch, ~~at~~ at 3:30pm. My previous
21 meal was sometime in the AM.

22 13. I asked for blanket but was denied because I was told
23 this is not housing.

24 14. I have not been told when I'd be moved.

25 15. I have HIV which makes the need for clean bandages
26 that much more important.

27 16. I am receiving my ~~medical~~ medicine for HIV - it's
28 been done in a timely manner.

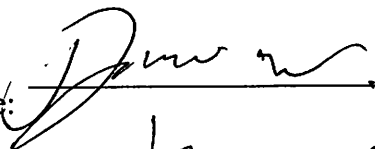
1 17. I have been seen my medical and mental
2 health evaluations. And I am still here in the holding cell
3 122 holding cell. even though I've done all the evalu
4 is. There are no mattresses.

5 19. The intercom doesn't work so if someone were to have
6 a heart attack we can't communicate. We need to
7 yell to get their attention for help and for toilet

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I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed this 16 day of 2, 2023 in Los Angeles, California.

Printed name: 
JAMES WILBER