Declarations of Incarcerated Persons in Support of Plaintiffs' Additional Briefing Re: Motion for an OSC Re: Contempt (Doc. 375)

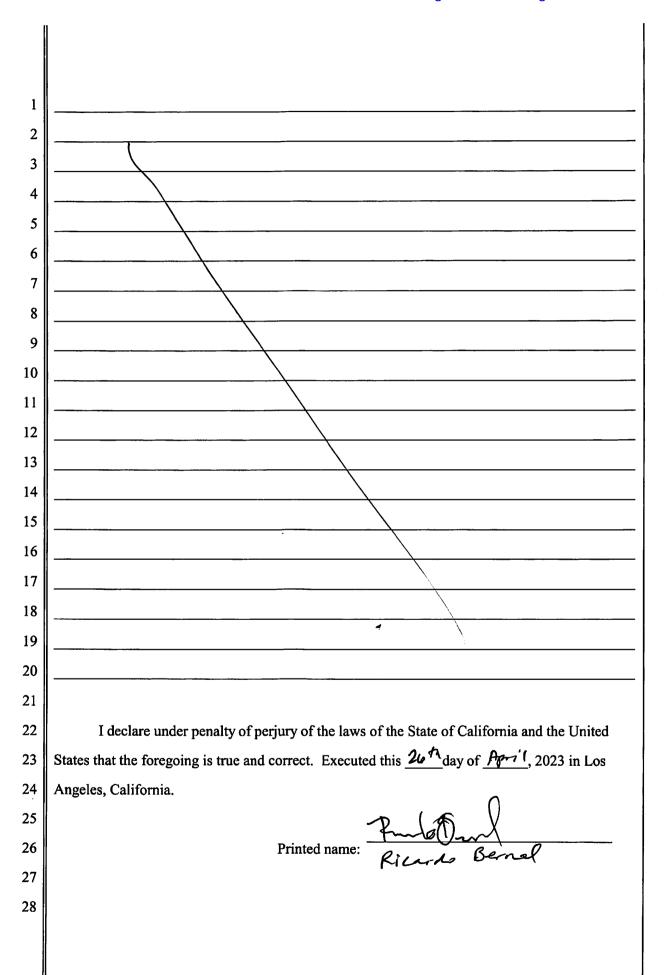
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Declaration of Ricardo Bernal 1 I, Ricardo Bernal, hereby declare: 2 I make this declaration based on my own personal knowledge and if 3 1. called to testify I could and would do so competently as follows: 4 2. My booking number is 6592636. 5 After my arrest, I was taken to St. Francis hospital for a CAT scan on 3. my shoulder and for my face. 7 4. From the hospital I was taken to South Gate Station jail. I stayed there 8 for 2 or 3 hours and after that they took me to IRC. 9 5. I got to IRC at around 11am on Tuesday, April 25. 10 I got a shower and then went to medical. I went upstairs and got 11 6. Ibuprofen. 12 I was in IRC clinic area overnight. I slept in the chair, but the pain in 13 7. my shoulder kept waking me up. 14 The pain in my shoulder is a 7 on a scale of 1-10. 8. 15 9. No one has told me what I'm waiting for. 16 Custody staff bought me to a custody line cell at around 1 pm. 10. 17 I tried to sleep on the floor of the cell, but it's not that comfortable in 11. 18 19 there. My head pain is also a 7 on a scale of 1 to 10. 12. 20 I declare under penalty of perjury of the laws of the State of California and 21 the United States that the foregoing is true and correct. Executed this 26th day of 22 April, 2023 in Los Angeles, California. 23 24 25 26 Ricardo Bernal 27 28

I, Melissa L. Camacho, interviewed Ricardo Bernal in the IRC on April 26, 2023, took notes and then wrote up his declaration while in the IRC, which is attached. I read Mr. Bernal 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 this 1st day of June, 2023 in Los Angeles, California. /s/ Melissa L. Camacho Melissa L. Camacho

1	Declaration of Ricards Burnel
2	I, hicardo berno , hereby declare:
3	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. <u>My booknymater is 6592636.</u>
6	3. After my arrest, 1 west was then + St. Francis Hospital
7	for a CAT Scan on my shoulder and for my face.
8	4. From the waspital of was folcen to South hate Station jail.
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19	10. Cushedy Strft brought me to a cush by line cell at
20	around pm.
21	11. I tried to Sleep on the floor of the Cell, but
22	its not that comfortable in there.
23	12. My head pain is also a 7 m a scale of 1 + 10.
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- I, Carlos Martinez Cruz, 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. Right now, I am currently housed in IRC 231-D Pod.
 - 3. I was arrested on Friday, April 28, 2023. I had court that day and I was told I would be brought here to County Jail but that I would be released around 9 or 10 pm, that same day. The judge had ordered my conditional release.
 - 4. Instead I am still here in LA County Jail. Today is Monday, May 1, 2023.
 - 5. I arrived to the IRC around 7/8pm on Friday, 4/28/23. I was brought up to 231 in the wee hours of Sunday, 4/30/23. I spent more than 24 hours in the IRC.
 - 6. During that time, I was not provided a pillow, blanket, toothpaste, nor toothbrush. It was really cold there.
 - 7. To get any sleep, I had to sleep on the floor. Other people who were there also had to sleep on the floor.
 - 8. During this process, I was asked if I have a diagnosis. I told them I have anxiety and I receive medication to help with my rehabilitation from substance use.
 - 9. For the last six months I have been taking medicine for my anxiety and substance use disorder. My doctor in the community is Wesley Health Center with Dr. Gomez. She is the one who prescribed me 450 mgs of Wellbutrin and an injection of vivitrol. Wellbutrin helps me with my anxiety. I take that every day. The injection of vivitrol is once a month. Due to court dates, I was not able to go last week to the clinic to get my shot. That was the first time I did not get my injection, but it was because of court.
 - 10. Without my anxiety medication, I don't feel well. My anxiety is at a high level. I have headaches. I feel like throwing up. It does not help that there's

1 so much noise and it smells bad. 2 11. My neighbor spends all day yelling and that does not help with my anxiety. 12. The plumbing is not working so that means neither do the bathrooms. We 3 4 can use the toilet but then all the water seeps out on to the floor. The entire 5 dorm smells like sewage. 13.Until I arrived to IRC-231, that was the first time I received a hot meal. 6 When I was in the Clinic, it was only burritos and peanut butter and jelly 8 sandwiches. 9 14.I had an allergic reaction while I was in the Clinic. I'm not sure what caused 10 it. It may have been the peanut butter sandwich. I broke out in hives and I was given a pill – I think it was Benadryl. 11 12 15. Yesterday evening a psychologist came to visit me and asked me what 13 medicine I take and if would accept a comparable medicine. I said yes. The 14 doctor said I would receive the medicine within an hour. That was yesterday and I still have not receive nor been offered my medicine. 15 16 16. Aside from the anxiety, my medicine helps me with sleep. I've barely slept 17 here. 17. In my current dorm (231-D Pod) it feels hot. I have not been able to take a 18 19 shower because the plumbing is not working. Yesterday I received my tooth paste and toothbrush. 20 21 18. During my interview with a nurse at the IRC, I heard when she spoke with 22 my partner, Karla Hernandez, to ask about my prescriptions and prescriber. 23 My partner gave her all the information. 24 19. The nurse said she would put in an order but that did not happen. 20. The last time I was here, I also told them about my medicine. The doctor put 25 the order in for my medicine without issue. But since I was released a little 26 27 later, I ended up not receiving it.

21. During my time in the IRC Clinic, there was trash on the floor, there was

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Declaration of Carlos Martinez CNZ 1 I. Carlos Martinez Cruz 2 , hereby declare: 3 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: Ahonta estay en el +PC-231-Dpod. 5 3. Fui arrestado el viernes, Abril 28 del 2023. Den Twe corte ese 6 dia y me diferon que me iba a traer al condado pero que iba a 7 salir como a las 9 o 108 de la noche, ese mismo dia. El Mez 8 habia ordenado mi libertad condicional. 4. En vez, todavia sigo aqui en la carcel de l condado. Hoy 10 es el 1 de mayo de 2023, un lunes. 5. Hegse at IPC como a las 7/8pm el viernes, 4/28/23. Me 12 subteron al 231 en la madrugada de 1 domingo, 4/30/23. 13 Passe mas de 24 hovas en el IRC. 14 6. Durante ese trempo, no me dieron almohada, cobija, pasta para 15 los dientes, ni cepillo. Hacia mucho frio alli. 16 7. Parn dormir, ture que dormir en el suelo. La otra gente 17 que esta alli tambien durmio en el piso. 18 8. Purante el proceso, me preguntaran si tengo un diagnostice. Yo Is informe que tengo ansiedad y pecibo medicamento para 20 ayudarme con mi fehabilitación del uso de drogas. 21 1. ya tengo 6 meses que tomo nediciona para mi ansiedad 22 y uso de substancia, mi doctor en la comunidad elles wesley Health 23 center con la Dra. Giornez. Ella me dio la receta de: 450 mg de 24 Wellbutrin y una inyecion de vivitrol. El wellbutrin me ayuda con 25 la anstellad. Me la tomo cada dia. La injection de uvitrol es una vez al mes. Con eso de la corte, no pude in la semana parada 27 a la clinica para allo mi injecto h. & Fue la prinera Vez que 28

no recibi mi inyecion, pero fue por que tuve corte, 10. Sin mi medicina de ansiedad, me stento mal. Mi ansiedal esta a un nivel atto. tengo dolor de cabeza, como que meda garas de 3 vomitar. noayida que hay mucho rido y nuele mal. 4 11. Mi vecimo se la pasa gritando y no me ayuda con la 5 ansredad. 6 12. La tubenz no sivve so tampoco los banos. Podemos usar 7 el baño pero despulo toda la agua sale al piso. Todo 8 el domitiono huela a suciedad. 13. Husta gre negue at IRC-231, fre la primera vez que 10 recibe comida calverte. Chando estaba en la clurca 11 nomas burritus y sandwiches de peanut britter 12 14. Cuando estaba el la clinica tre una reacción atergica. 13 No se que lo causo, A la mejor el peanot Butter sandwich. Ronchas me salveron y me diteron una pastilla - creo que fue Benadryl. 16 Is. Ayer en la tarde una psizologa me uno a visitar yme pregunto que medicina tomo y si aceptana una medicina comparable, le dije que si. La do dora de)o que iba recubit medicina entre una hora, Eso fue ager y todanu 20 po a no me han ofrecido ni he recibido mimediana. 21 16. tparte de la ansiedad, mi medicina me ayuda pava dormir. A duras apenas que dormido 17. En mi damardo ahorita (231-DPod) se siente catrente. no me he podido Barrar porque la tiberia no sime. Ayer reable mi pasta de dientes y cepillo. 18. Durante mientrensta con la enferma, yo escuche coundo 27 ella habbo con mi pareja, Karla Hernandez 28 preguntar subre mi receta y gover la Receto. Mi pareja div toda la información.

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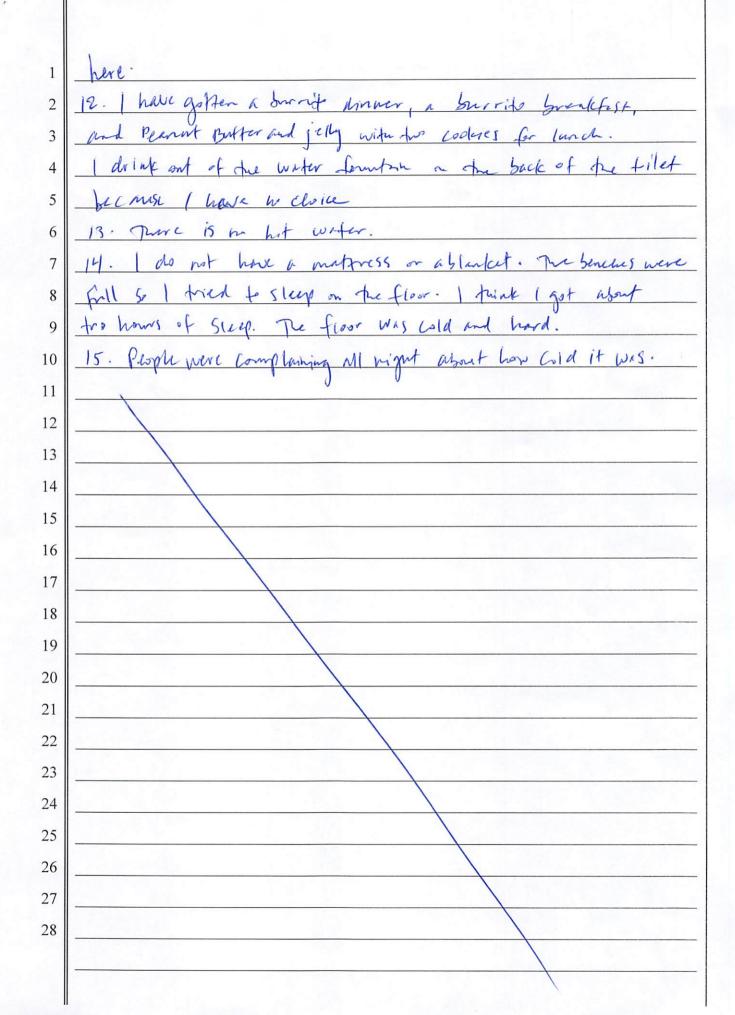
Declaration of Eric Radford

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- I, Eric Radford, hereby declare:
 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 6550481.
- 3. On Thursday night at around 10:30 pm, I was put in holding cell 215 in the IRC.
- 4. Before this cell, I was housed at Wayside supermax also known as North County Correctional Facility.
- 5. I was brought to IRC so I could be released. I was told by a deputy that I can't be released because my probation officer hasn't come to pick me up.
 - 6. I have been in this cell for over 16 hours.
- 7. There is no toilet paper in this cell. There hasn't been any toilet paper the whole time I've been in this cell. A few hours ago, a trustee slid some paper towels under the door for me to use.
- 8. The toilet isn't clean but it's usable. It is stained from dirty water sitting there for too long. It takes a lot of courage for me to sit on the toilet.
- 9. Right now I'm the only one in this cell. There have been as many as 12 people in here. The last person left a couple hours ago, and he was here when I arrived at 10:30 last night.
- 10. My cell is full of trash. There are two bags full of entire burritos one from dinner last night and one from breakfast this morning. There are empty cartons, some plastic bags and more burritos on the floor and on the window shelves.
 - 11. No one has come to take out any trash since I've been here.
- 12. I have gotten a burrito dinner, a burrito breakfast and peanut butter and jelly with two cookies for lunch. I drink out of the water fountain in the back of the toilet because I have no choice.

1 13. There is no hot water. 2 14. I do not have a mattress or a blanket. The benches were full so I tried to sleep on the floor. I think I got about two hours of sleep. The floor was cold and 3 4 hard. 15. People were complaining all night about how cold it was. 5 6 I declare under penalty of perjury of the laws of the State of California and 7 8 the United States that the foregoing is true and correct. Executed this 21st day of 9 April, 2023 in Los Angeles, California. 10 Eric Radford 11 12 13 I, Melissa L. Camacho, interviewed Eric Radford in the IRC on April 21, 2023, took notes and then wrote up his declaration while in the IRC, which is 14 attached. I read Eric Radford the declaration, he approved its contents and signed 15 16 it. I have reviewed this word processed version of this declaration and declare that 17 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 18 United States that the foregoing is true and correct. Executed this 1st day of June, 19 2023 in Los Angeles, California. 20 21 22 23 24 /s/ Melissa L. Camacho 25 Melissa L. Camacho 26 27 28

Declaration of Eric Radford 1 I, Eric Radford , hereby declare: 2 I make this declaration based on my own personal knowledge and if called to 3 testify I could and would do so competently as follows: My beoling number is 655 0481. 5 3. On Thursday night at around 10:30 pm, I was put in holding cell 215 in the IRC. 4. Before puis cell, I was housed at wayside supermax, also known as North County Correctional Facility. 5. I was brought to IRC So I could be released. I was fold by a deputy that I can't be released because my probation officer hagit come to prick me up. 6. I have been in fuis cell for over 16 hours. 13 7. There is no toilet paper in this cell. There hasn't been any filet paper pre whole time live Jeen in this cell. A few hours ago, a frustee stid some paper towels under ofen door for me to use. 17 8. The filed isn't clear, but it's usable. It is stained from dirty water Sitting there for to long. It takes a It of Courage for me & sit on the filet. 9. Right how I'm the only one in this Cell. There have been as many as 12 people in here. The last person left a comple homs ago, and he was here when I writed at 10:32 last origet. 10. My Cell is full of from. There are the bags full of entire 24 Jonavitos- from dinner last night and one from breakfish twis 25 morning. There are empty contons, Small plastic bags and more furrits on the from and on the window suclus. 11. No me hes come to take out any trash since the been 28



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1 **Declaration of Daniel Ray** 2 I, Daniel Ray (6592771), hereby declare: I make this declaration based on my own personal knowledge and if 3 1. 4 called to testify I could and would do so competently as follows: On April 25, 2023, I turned myself into for a parole violation. 5 2. When I came to the IRC, I was detoxing from alcohol. I went into 6 3. cardiac arrest and was sent to the ER at LA County – USC Medical Center. 7 I returned to the IRC and in a mental health screening, told the staff 8 4. 9 person that I was on psychiatric medication for anxiety, including Lexapro. 10 5. I told the screener that I was getting medication from Charter Oaks 11 I was prescribed medication at Charter Oaks most recently around 6. April 13, 2023. I was in a program at Charter Oaks for around 8 days then went to 12 13 another program called Puente House. I last took Lexapro at Puente House around April 17, 2023. 14 7. 15 The screener at IRC said I would see a clinician soon, but I have not received any medication yet. Today is May 11. 16 17 8. Today I saw a clinician, but she said I was not on her list and could not see me today. She told me they are short staffed. 18 I feel a lot of anxiety. I try and do breathing exercise on my bunk. I 19 9. feel the anxiety in my chest and my heart starts beating really fast. I feel like a cat 20 21 on a hot tin roof.

10. On the streets I had meds. Here I am denied that.

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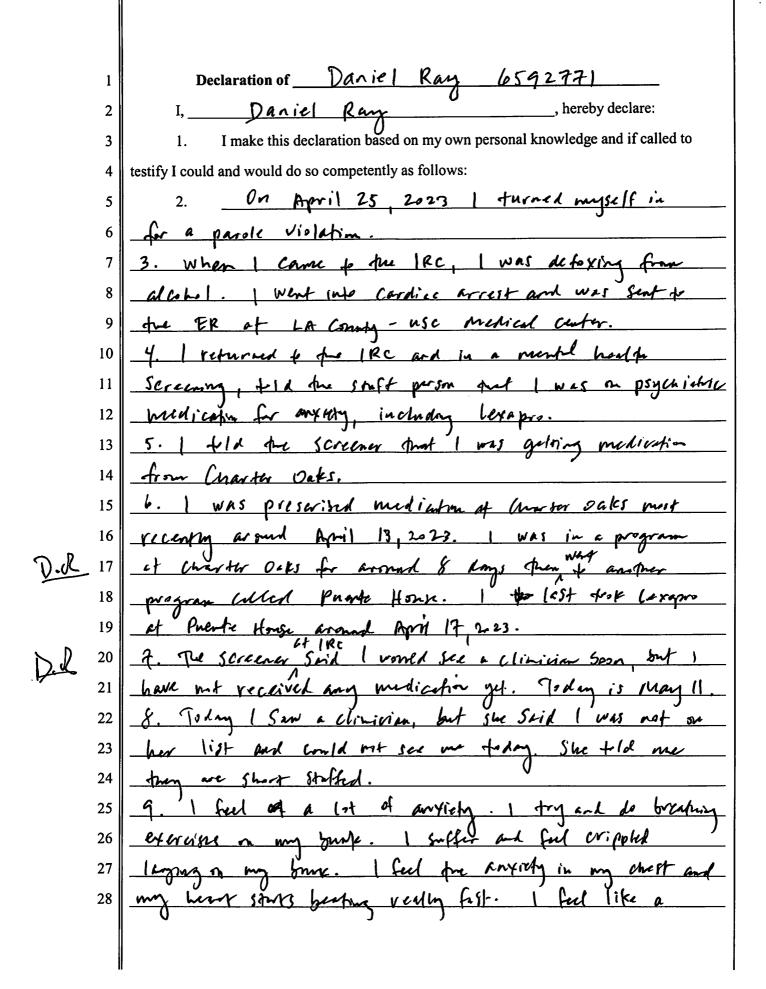
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I am currently housed in Pitchess North 3-C bunk 69. 11.

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 11th day of May, 2023 in Los Angeles, California.

Daniel Ray

I, Melissa L. Camacho, interviewed Daniel Ray in Pitchess North, 3-C on May 11, 2023, took notes and then wrote up his declaration while in the Pitchess North, which is attached. I read Mr. Ray 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 this 6th day of June, 2023 in Los Angeles, California. /s/ Melissa L. Camacho Melissa L. Camacho



1	cat ma bot fin roof.
2	10. 0- pre street I had meds. Here I am deviced pat.
3	10. 0- for street 1 had meds. Here I am denied pat. 11. I am arrowly housed in Pitchess North 3-C beach 69.
4	J
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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 11 had ay of 2023 in Los
24	Angeles, California.
25	Danker
26	Printed name: Daniel Rang
27	0
28	

1 **Declaration of Michael Valani** 2 I, Michael Valani, hereby declare: I make this declaration based on my own personal knowledge and if 3 1. 4 called to testify I could and would do so competently as follows: 5 My booking number is 6591721. 2. I was arrested on Sunday the 23rd in Lancaster, CA. 6 3. I was taken to the Lancaster jail, but I take medication for Epilepsy. I 4. 7 8 was told that they had to bring me down to the county jail so I could get my 9 medication. 10 5. On Monday, April 24 I was brought to the IRC. I arrived around mid-day. 11 6. 12 They gave me clothes, but I didn't get a shower. 7. 13 8. I was in the medical clinic area overnight. At some point, I had to go 14 upstairs to emergency. I have fractured bones in my back from a seizure on April 15 5, 2023. I told people in the IRC clinic area that I was in pain, so they sent me to 16 emergency. 17 Medical staff gave me a shot when I was in emergency, then I went 9. back down to the IRC clinic. 18 19 I didn't have a mattress or a blanket. I tried to sleep sitting up in the 10. chairs, but I couldn't. 20 21 The toilets were dirty and had urine on the seats. 11. 22 12. I had burritos and orange juice to eat. 23 13. I did not get any toothbrush or soap. 24 14. Early in the morning I was put in a holding cell with other people who

15. I was shuffled into different cells while they were trying to organize us by which court we were going to.

had to go to court. This was the morning of Tuesday the 25th.

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16. I went to court in Lancaster. At that time – mid day Tuesday – the last

time I'd been able to brush my teeth was before I left Lancaster jail on Monday 1 2 morning. I felt really dirty. The last time I had access to soap was in Lancaster jail. I didn't talk to anyone at court. Eventually an officer told me my 3 17. charge was rejected. 4 I got back on the bus to go from Lancaster to the IRC. 5 18. I went into a cell in the IRC. Then I was taken to a place in Twin 6 19. 7 Towers where I had a bed. 8 20. At some time during the night, the custody staff moved me to Men's 9 Central Jail 5700. 10 21. I have been told that I am supposed to be released. 11 22. On the way back from Lancaster, an officer on the bus told me I would be released Tuesday or Wednesday. 12 I received my epilepsy medication in the IRC and a muscle relaxer for 13 23. my back. 14 15 16 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 26th day of 17 18 April, 2023 in Los Angeles, California. 19 20 Michael Valani 21 22 I, Melissa L. Camacho, interviewed Michael Valani in Men's Central Jail on April 23 26, 2023, took notes and then wrote up his declaration while in Men's Central Jail, 24 which is attached. I read Mr. Valani the declaration, he approved its contents and signed it. I have reviewed this word processed version of this declaration and 25 declare that it accurately reflects the content of the handwritten, signed version. 26 27 I declare under penalty of perjury of the laws of the State of California and the 28

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United States that the foregoing is true and correct. Executed this 1st day of June, 2023 in Los Angeles, California. /s/ Melissa L. Camacho Melissa L. Camacho

	1	Declaration of Michael Valani		
	2	I, <u>Michael Valani</u> , 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 6591721.		
	6	3. I was arrested on Sunday the 23rd in Lancister, CA.		
	7	4. 1 was taken to the lancaster jail, but I take		
	8	medicalin for Epilepsy. I was told that they had to		
	9	bring me down to the county jail & I could get my		
	10	medication.		
	11	5. On Monday, April 24 I was brought to the IRC.		
	12	6. I arrived around mid-day.		
	13	7. Then gave me clothes, but I didn't get a shower.		
MU	14	8. I was in the medical climic area. At some point, 1		
	15	had to go upstrivs to emergency. I have fractured somes		
	16	in my back from a Sciture on April 5, 2023. 1+1d		
	17	people in the IRC Clinic area for I was in pain, & truy		
	18	Gent me to emergency. Missical Stiff ()		
MU	19	9. They gave me a shot when I was in emergency than I		
	20	want back down to the per clinic.		
	21	10. I didn't have a matricis or a blanket. I tried to		
	22	Sierp sitting up in the chans, but I conedat.		
MA	23	11. The trilets were dirty and had me in the sects.		
	24	12. I had burritos and wange juice to est.		
	25	13. I did not get any toop brush or soap.		
	26	14. Early in the morning I was put in a holding		
	27	cell with other people who had to go to court. This was		
	28	the morning of presday for 25th.		
		~		

