I, YOLANDA HUANG, declare as follows:

1. I am an attorney, licensed to practice in the State of California, and am one of the attorneys for Plaintiffs in the above captioned matter. Everything stated herein is true of my own personal knowledge. If called to testify, I can and will testify as set forth below.

2. In early December, 2017, I learned that there were a number of pregnant women in Santa Rita who were concerned about their treatment while in the custody of the Alameda County Sheriff’s Office. I learned that they were afraid that they would be unable to carry their pregnancies to term, and would not be able to have healthy babies.
3. I learned that Jaclyn Mohrbacher, Erin Ellis and Dominique Jackson were among the women currently pregnant, under the custody and control of the Alameda County Sheriff’s office, and housed at Santa Rita Jail, in Dublin, California.

4. Subsequently, I began requesting contact visits with a number of the women, and had contact visits wherein I confirmed many of the descriptions provided by plaintiff Zepeda.

5. I learned that often, when pregnant women request medical attention for not feeling well, Santa Rita guards deny them medical attention and instead accuse them of abusing illegal drugs. These women are then placed in solitary confinement and required to repeatedly undergo strip searches and body cavity searches.

6. I learned that it is a common practice to place pregnant women into solitary confinement. I learned that it is a common practice to deny pregnant women medical care, and to accuse the pregnant women of using illegal drugs and to then force them to undergo strip searches and body cavity searches. I learned within the last 6 months, a female inmate who was nine (9) months pregnant was placed into solitary confinement and ignored. Despite the fact that the woman screamed for hours, not a single deputy checked on her welfare for an entire duty shift. This woman was forced to deliver her baby, by herself, while housed in solitary confinement. Not until after the baby had been delivered and the crying sounds of an infant could be heard, did a sheriff’s deputy then check on this woman, for the purpose of removing her child.

7. All the women in that housing unit heard and endured listening to the screams of that woman while she delivered her baby, alone, in solitary confinement.

8. I learned that not only are pregnant women held in solitary confinement, but they are placed outside without adequate clothing. In the month of December, pregnant women are held outside until 1:30 am dressed only in a prison jumpsuit and a tee shirt.

9. I learned that the guards regularly encourage these pregnant women to abort their babies, and that these “encouragements” are often communicated in coercive and threatening manners.

10. I learned that routine medical care consists of taking the pregnant women’s vital signs three times a day, which includes waking them up at 2 am.

11. I learned that pregnant women are required to get up at 4 am in order to have breakfast, otherwise they will not receive food.

12. I learned that although there is no jail rule against conversation during meals, the guards in control of women inmates prohibit women from having conversation during meals, and
punish the entire group if any woman attempts to converse during meals. I learned that the
male inmates do not suffer under this oppression.

13. I learned that although there is no jail rule, the guards in control of women inmates do not
allow the women to choose where they sit during meals, and instead order the women to sit in
assigned seats based upon the guard’s discretion. I learned that the male inmates do not suffer
under this oppression.

14. I learned that the Alameda County Sheriff’s Office does not provide a staff obgyn to examine
and evaluate women inmates.

15. Jaclyn Mohrbacher signed a retainer agreement, and consented to be a class representative for
similarly situated individuals. During this visit I encouraged her to file formal grievances in
order to comply with the requirement of exhausting administrative remedies before the
initiation of litigation.

16. That night and the next day, I received numerous phone calls from women inmates at Santa
Rita Jail, including from plaintiffs Jackson and Ellis requesting that I provide assistance, that
they were fearful of not being able to carry their pregnancies to term.

17. I then faxed a letter request to Santa Rita Jail for visits with five (5) additional women
inmates. My intent was to have retainer agreements signed and to work with them to draft
and sign declarations for filing. My initial fax was transmitted on December 21, 2017. After
hearing no response, I faxed twice on December 26, 2017, once in the morning and once in the
evening. I finally received a phone call from Santa Rita on December 27, 2017, confirming
that my appointments had been approved for December 29, 2017. It took one week from
request to scheduling.

18. When I arrived on December 29, 2017 for these legal, contact visits, my first visit was
delayed. When I inquired, I was told that a Sargent had to approve my contact visits. After
waiting almost two hours, a Sergeant Calagari spoke with me. Sgt. Calagari informed me that
I was being denied my contact visits, and that my contact visits henceforth would all be
denied. Sgt. Calagari further told me that I could not have any visits on December 29, 2017,
not even a non-contact visit. He stated that I had to begin the process anew by submitting
new written requests for legal visits.

19. Sgt. Calagari stated that this was standard policy for Santa Rita. Sgt. Calagari stated that
Santa Rita had now classified me as not the attorney of record. Sgt. Calagari informed me
that he was enforcing standard Santa Rita policy but Sgt. Calagari was unable to cite the policy. He stated that his supervisor was Lt. Hattaway. Sgt. Calagari refused to discuss with me, the situation where I had been previously permitted to have contact visits with inmates. He refused to review the paperwork I had already submitted, and stated that I had to leave and fax anew, a request for legal visits. He stated that Santa Rita had to re-process my clearance for legal visits.

20. Attached as Exhibit A are two facsimile requests, one transmitted on December 13, 2017 and one on December 18, 2017. In both of these cases Santa Rita Jail responded within 24 hours to schedule legal, contact visits with plaintiffs and potential members of the class. My legal contact visit with plaintiffs Kelsey Erwin and Jaclyn Mohrbacher took place on December 15th and December 21, 2017.

21. Attached as Exhibit B are the requests transmitted via facsimile to Santa Rita Jail on December 22, 2017, and twice on December 26, 2017. Santa Rita Jail did not respond until December 27, 2017, and when I appeared for the visits at the agreed upon date, December 29, 2017, I was denied all visits.

22. Jaclyn Mohrbacher began filing grievances regarding her treatment after our December 21, 2017 legal contact visit. This was confirmed in a telephone conversation we have had subsequently. I believe and assert based upon information and belief that the five (5) day delay required to respond to my facsimile request for a legal contact visit, and the denial of my legal contact visits on December 29, 2017, is part of the Alameda County Sheriff’s Office actions to deny legal representation to plaintiffs and the class of women they represent, and to prevent plaintiffs and the class they represent from being able to assert their legal rights to redress, and to prevent public examination of the abuse and sadistic treatment of women, particularly pregnant women, under their custody and control.

23. Attached as Exhibit C is the declaration that I planned to have plaintiff Mohrbacher review and sign if I had been allowed to continue with legal contact visits. This declaration is based upon her recitation of her experience in Santa Rita Jail.

24. Attached as Exhibit D is the declaration I planned to have female prisoner Denise Rohrbacher review and sign if I had been allowed to have my previously scheduled legal contact visit. This declaration is based upon her recitation of her experience in Santa Rita Jail, provided in a telephone call.
25. Attached as Exhibit E is the declaration I planned to have female prisoner Dominique Jackson review and sign if I had been allowed to have my previously scheduled with legal contact visit. This declaration is based upon information she provided in multiple telephone calls. I declare under penalty of perjury that the foregoing is true and correct, executed in Oakland, California, this 2\textsuperscript{nd} day of January, 2018.

/s/ Yolanda Huang
YOLANDA HUANG
EXHIBIT A
YOLANDA HUANG
ATTORNEY AT LAW

Date: Dec. 13, 2017

Santa Rita Jail – Via Facsimile: 925-803-7118

Re: Legal Visit Request s— Kelsey Erwin, PFN: BLK401
Monica Nunes, PFN BCJ178
Ruben Febo PFN: BEM444

Dear Santa Rita Jail:

I am requesting a contact visits for Friday December 15, 2017 or Monday December 18, 2017, as follows:

Erwin: 1 p.m.
Nunes: 2 p.m.
Febo: 3 p.m.

I am requesting a contact visits because I need to review documents with each inmate and possibly obtain signatures. I estimate that I will need 60 minutes for each visit.

Please call me on my direct line: 510-329-2140 to confirm the date and time for this visit.

Sincerely,

Yolanda Huang

PO BOX 5475•BERKELEY•CA•94705
PHONE: 510 329 2140 • FAX: 510-580-9410 • YHUANG.LAW@GMAIL.COM
YOLANDAHUANG
ATTORNEY AT LAW

Date: December 18, 2017

Santa Rita Jail – Via Facsimile: 925-803-7118

Re: Legal Visit Request – Jaclyn Mohrbacher, PFN: ULW440

Dear Santa Rita Jail:

I would like to request a contact visit either Thursday, December 21st at 1 p.m. or Wednesday, Dec.20th anytime in the afternoon. I am requesting a contact visit because I need to review documents with Ms. Mohrbacher and also obtain her signature on documents. I estimate that I will need 60 minutes for this visit.

Please call me on my direct line: 510-329-2140 to confirm the date and time for this visit.

Sincerely,

Yolanda Huang
EXHIBIT B
YOLANDA HUANG  
ATTORNEY AT LAW

Date: December 22, 2017

Santa Rita Jail – Via Facsimile: 925-803-7118

Re: Legal Visit Requests  
Dominique Jackson; BID632 HU 24A  
Erin Ellis; BBG504 HU 24C  
Alice Fausto; BJC 211 HU 24C  
Denise Rohrbacher; ULR 142 HU 24C

Dear Santa Rita Jail:

I would like to request a contact visit Tuesday, December 26th starting at 11 a.m. one hour per visit until completed (11, 12, 1, 2) Wednesday, Dec. 20th anytime in the afternoon. I am requesting a contact visit because I need to review documents with Ms. Mohrbacher and also obtain her signature on documents. I estimate that I will need 60 minutes for each visit. If it is not possible to have visits with all four women, my priorities are for visits with Dominique Jackson, Erin Ellis, Denise Rohrbacher and then Alice Fausto, in this order.

Please call me on my direct line: 510-329-2140 to confirm these visits. Thank-you.

Sincerely,

Yolanda Huang

PO BOX 5475 • BERKELEY • CA • 94705
PHONE: 510 329 2140 • FAX: 510-580-9410 • YHUANG.LAW@GMAIL.COM
YOLANDA HUANG
ATTORNEY AT LAW

Date: December 26, 2017

Santa Rita Jail – Via Facsimile: 925-803-7118

Re: Legal Visit Requests
   Dominique Jackson; BID632 HU 24A
   Erin Ellis; BBG504 HU 24C
   Denise Rohrbacher; ULR 142 HU 24C
   Alice Fausto; BJC 211 HU 24C
   Dawn Dedrick, ULW471, HU 24B

Dear Santa Rita Jail:

My original letter request sent on Friday the 22nd may have been confusing. I have not heard back from you, so I am assuming there will be no contact visits today. If there can be contact visits today, please call me asap.

If there are no visits today, I would like to request contact visits starting at 10 a.m., one hour per visit each until completed (10, 11, 12, 1, 2) either Thursday, December 28th or Friday, December 29th. I am requesting contact visits because I need to review documents with these women and also obtain their signatures on documents. If it is not possible to have visits with all five women on one day, my priorities are for visits in the following order: Dominique Jackson, Erin Ellis, Denise Rohrbacher, Alice Fausto and then Dawn Dedrick. Thank-you.

I am attaching a letter from the attorney of record for Dawn Dedrick, consenting to my legal visit.

Please call me on my direct line: 510-329-2140 to confirm these visits.

Sincerely,

Yolanda Huang

PO BOX 5475 • BERKELEY • CA • 94705
PHONE: 510-329-2140 • FAX: 510-580-9410 • YHUANG.LAW@GMAIL.COM
2nd fax request
925-873-7108
To Santa Rita Jail

Sex attached.

Please let me know if

requested visits can be

scheduled.

Yours truly

Cover + 2
I, JACLYN MOHRBACHER, declare:

1. I am one of the named plaintiffs in this case. I make this declaration of my own knowledge and if asked to testify, can and will testify as stated herein.

2. I am currently in a jail at Santa Rita Jail. I entered into Santa Rita at the beginning of November, and I was already pregnant. The pregnancy test administered by the jail confirmed my pregnancy.

3. I am unaware of any “care plan” that has been developed due to my pregnancy. The only care I receive that is different than what the rest of the women prisoners receive, is that my vital signs are monitored three times day, including every day at 2 a.m. This means they
wake me up every night at 2 am to take my blood pressure. The only other difference is
that I am provided with 8 ounces of milk at lunch, and receive a snack with another 8
ounces of milk. Breakfast is at 3:30 or 4 a.m., and if I am unable to get up to go to
breakfast, which is most days, then I must endure 18-19 hours of no food from dinner to
lunch. Lunch is usually a peanut butter and jelly sandwich with either an apple or a cookie.
The snack is the same as lunch. Dinner is rice or pasta with beans and some mushy
vegetable, and a few slices of bread. Everyone gets the same food except that we get 8
ounces of milk.

4. When I have to go to court, the process begins at 4 a.m. First we must wait in several
rounds of ice cold concrete holding cells with no seating or inadequate sealing. No one gets
extra clothing and I only have a jumpsuit and a tee shirt to wear. All of us, including those
of us who are pregnant are required to stand for long periods of time in the crowded and
cold holding cells. In the first holding cell there are no seats. In the second holding cell
there is space for maybe 5 to 8 people. We all take turns sitting. There are always three
times the number of people as seats. So, most of the time, if I cannot stand, I have to sit on
the cold, hard concrete floor, or lie down on the cold concrete floor.

5. In Santa Rita, the men are processed first. Returning from court, often women prisoners
are not returned from court to the jail often until 4 or 5 p.m.. Once we return to the jail, we
then have to wait in another series of filthy, cold holding cells often until 8 p.m. Court days
are 16 to 17 hour days.

6. There is a woman, ______, who provides us with some health care, but I do not like her
and do not trust her, because she is always promoting abortions. The first time I saw her, I
told her that I did not want an abortion, that I wanted to have this baby. Then ____ began to
tell me that my baby was dead and that I should have an abortion. Although I refused to
consent to an abortion, she scheduled me for an abortion. When I refused to go, she had two
men come to my housing pod, trying to forcibly take me to have an abortion. When I again
refused to agree to an abortion, the deputies yelled at me and told me I was on drugs. From
then on, their treatment of me grew more abusive and worse.

7. From that time on, if I requested medical care, or said I was not feeling well, the housing
guards, including deputies Famanian, Pope and Divine would all tell me that my problem
was that I was on drugs, and they would strip me, meaning they would subject me to the
humiliating and degrading practice of doing strip search and body cavity search. To do these searches, they would take me and often another pregnant woman and put us in the isolation or solitary confinement cells. We would have to stay there for hours. Then they would often take us to another room, make us strip naked, squat, and show our vagina and anal cavities, our mouth.

8. One day, when I complained of not being well and requested a medical visit, defendant Divine again accused me of using drugs, and placed me into solitary confinement. I repeatedly denied using drugs and requested that defendant Divine administer a urine test to prove that I was not using drugs. Defendant Divine ignored all of these repeated requests. Defendant Caine laughed and scoffed at Mohrbacher’s request for a urine drug test, and the two locked me into the solitary confinement cell.

9. On another day, a number of guards swarmed the pod doing searches in the housing pod, and again placed plaintiff me into solitary confinement. Some significant time passed and they moved me into an outside holding pen. This was in December, when the weather is cold. I was dressed only in a prison jumpsuit and a tee shirt. I was held in the freezing cold, outside for many hours until 1:30 a.m. before being released back into the pod.

10. Due to the stress and abuse I suffer daily at the hands of defendant guards, I am spotting blood vaginally. During one of these harassment sessions, I was spotting. Defendant Divine demanded that I strip and when she saw that I was bleeding, she demanded that I wipe the blood away so she could do the search. I asked her for some pads or a paper towel. Defendant Divine picked up a garbage can and told me to use something from the can. I had no choice, but under the threats of reprisals and punishment, used a used menstrual pad to wipe myself so that defendant Divine could conduct the invasive, offensive and demeaning sadistic strip search and body cavity search.

11. I have seen the Santa Rita guards physically shake and assault pregnant prisoners.

12. Once, when the guards came in at 6 am and demanded that we get up and stand so they could conduct another search, defendant Divine came to me and told me that I looked terrible, and she thought I was dead. The guards again accused me of using drugs and again ignored my request for a urine test to prove that I was not using drugs.

13. During one of these searches, defendant Divine took the food that I had purchased from the commissary and using her unclean, unwashed, ungloved hand, put her fingers through
all of my food. By doing what she was doing, defendant Divine was wasting that food and making me waste my money, because I could no eat food that she had run her fingers through.

14. I have agreed to be a class representative for similarly situated individuals.

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

Dated: Dec.__, 2017

JACLYN MOHRBACHER
I, DENISE ROHRBACHER, declare as follows:

1. I am currently a female prisoner in Santa Rita Jail and everything stated herein is true of my own knowledge. If called to testify, I can and will testify as set forth below.

2. I was convicted on April 3, 2017, and am due to be released in late January, 2018. While I have been in Santa Rita this past 9 months, I personally witnessed a situation where a very pregnant woman was arrested and placed in my housing unit. She was only in my housing unit a short time, so I did not get her name.

3. She complained of not feeling well. One day, she was in so much pain that she could not walk and had to crawl on her hands and knees. The defendants in this case, instead of taking
her to receive medical care, placed her into an isolation cell. There is an isolation cell near
the housing unit, off of a hallway.

4. While in the isolation cell, this woman began to scream, and yell. She was banging on her
metal door. What the guards did instead of providing her with help or trying to see what was
wrong, instead closed the window to her door, so she could not see out, and no one could see
in. Closing the window also slightly muffled this poor woman’s screaming.

5. This woman’s screams became louder. She was crying. As far as I could tell, not a single
deputy went over to try and see what was wrong.

6. This went on for hours, and hours. This went on over to the next guard shift change.

7. It was agonizing and torture for us to hear her scream like that.

8. Finally, we could hear the crying of a baby. Apparently, this woman had given birth, alone.

9. Only after we could hear the crying of the baby, did the deputies finally go over and open her
door. Thank goodness the baby lived.

I make this declaration under penalty of perjury under the laws of the State of California.
December __, 2017

DENISE ROHRBACHER
EXHIBIT E
I DOMINIQUE JACKSON, declare:

1. I am currently a pregnant prisoner inside of Santa Rita Jail. I make this declaration of my own true knowledge.

2. I am currently 17 weeks pregnant. I was pregnant at the time I entered into the custody and control of the Alameda County Sheriff’s Office.

3. Prior to being incarcerated, my treating obstetrician at Highland Hospital had informed me that I am pregnant with twins, and that I have a high risk pregnancy due to being pregnant with twins, and due to my own health risks. I suffered a cardiac arrest previously and was
taking cardiac medication. I am unaware of a plan of care, and have not seen an obstetrician since becoming a prisoner.

4. Some of the pregnant women are receive routine and daily vital signs monitoring. I have not, and I have not had any contact with medical personnel for over 2 weeks. Since my incarceration, I have had a headache. I get dizzy and a headache when I stand or have to stand for any period of time. When I tell the defendant deputies that I do not feel well, their response is that I need counseling, and they completely discount my request for medical attention.

5. I am not receiving the necessary prescription medication which had been prescribed for me by my obstetrician.

6. And, I am not receiving sufficient food. I often feel hungry. I receive watery oatmeal for breakfast. I receive peanut butter and jelly on thin slices of bread for lunch and breakast. And for dinner I receive a plain beef patty and plain potatoes. My diet is completely deficient in fresh fruits and vegetables, and the quantity is insufficient, given that I have twins.

7. I have been seen by the nurse practitioner here, Lucy. She is the only medical personnel on staff, and she treats everyone. She is not a specialist in obstetrics, and does not seem to understand my concerns and issues.

8. I want to carry my babies to term, and I wish to deliver, healthy babies. Given the conditions that I am experiencing and the lack of medical care, I am extremely worried that I will be unable to carry my babies to term, or that my babies will suffer some adverse consequences due to the harmful conditions, lack of a nutritious and sufficient diet and treatment I am experiencing.

9. On or about December 1, 2017 I contacted attorney Yolanda Huang and expressed my distress and concern over the lack of medical care that I was receiving and asked for her assistance in intervening on my behalf.

10. I know that on December 29, 2017, attorney Huang had scheduled a legal contact visit. However, after she arrived, Santa Rita Jail denied her the visits.

11. I am asking the Court for a temporary restraining order so that I can receive the urgent medical care which I and my babies need, and an adequate, nutritious healthy diet which is required by 15 CCR 3355.2(h)1. I am not receiving either a balanced diet, nor a nutritious diet. And the quantity of food is not sufficient.
12. I am willing to be a plaintiff in this case and to represent all potential class members.
I make this declaration under penalty of perjury under the laws of the State of California, executed in
Dublin, California.

Dated: December ___, 2017

________________________________________
DOMINIQUE JACKSON