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14 UNITED STATES DISTRICT COURT  
15 EASTERN DISTRICT OF CALIFORNIA  
16

17 RALPH COLEMAN, et al.,  
18 Plaintiffs,  
19 v.  
20 EDMUND G. BROWN, Jr., et al.,  
21 Defendants.  
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Case No. Civ S 90-0520 LKK-JFM

**EXPERT DECLARATION OF  
JEANNE WOODFORD IN SUPPORT  
OF PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION TO  
TERMINATE**

Judge: Hon. Lawrence K. Karlton

**TABLE OF CONTENTS**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
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22  
23  
24  
25  
26  
27  
28

**Page**

INTRODUCTION ..... 1

I. EDUCATION, BACKGROUND, AND EXPERIENCE WITH CDCR..... 1

II. FOUNDATION FOR EXPERT OPINIONS IN THIS ACTION ..... 3

III. EXPERT OPINIONS IN THIS MATTER..... 4

    A. The Unique Needs of Condemned Inmates..... 4

    B. Crowding and Staffing in Units for the Condemned..... 12

    C. The Specialized Care Program ..... 15

IV. OTHER OPINIONS REGARDING MENTAL HEALTH CARE DELIVERY AT SAN QUENTIN ..... 19

    A. The Adjustment Center..... 19

    B. The Mental Health Assessment Process in RVR Adjudications..... 21

    C. Suicide Prevention / Emergency Response ..... 22

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
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14  
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## TABLE OF ABBREVIATIONS

ACA	American Correctional Association
APP	Acute Psychiatric Program
ASH or Atascadero	Atascadero State Hospital
ASP or Avenal	Avenal State Prison
ASU	Administrative Segregation Unit
BCP	Budget Change Proposal
CAL or Calipatria	Calipatria State Prison
CCC	California Correctional Center
CCCMS	Correctional Clinical Case Manager System
CCI	California Correctional Institution
CCPOA	California Correctional Peace Officers Association
CCWF	Central California Women's Facility
CDCR	California Department of Corrections and Rehabilitation
CEN or Centinela	Centinela State Prison
CIM	California Institute for Men
CIW	California Institute for Women
CMC	California Men's Colony
CMF	California Medical Facility
CMO	Chief Medical Officer
COR or Corcoran	California State Prison/Corcoran
CPR	Cardiopulmonary Resuscitation
CRC	California Rehabilitation Center
CSH or Coalinga	Coalinga State Hospital
CTC	Correctional Treatment Center
CTF	California Training Facility/Soledad
CVSP or Chuckwalla	Chuckwalla Valley State Prison
DMH	Department of Mental Health
DSH	Department of State Hospitals
DOT	Direct Observation Therapy
DVI or Deuel	Deuel Vocational Institute
EOP	Enhanced Outpatient Program
EOP ASU Hub	Enhanced Outpatient Program Administrative Segregation Unit
FOL or Folsom	Folsom State Prison
HDSP or High Desert	High Desert State Prison
ICF	Intermediate Care Facility
ISP or Ironwood	Ironwood State Prison
KVSP or Kern Valley	Kern Valley State Prison
LAC or Lancaster	California State Prison/Lancaster
LVN	Licensed Vocational Nurse

1	LOB	Lack of Bed
2	MCSP or Mule Creek	Mule Creek State Prison
3	MHCB	Mental Health Crisis Bed
4	MHOHU	Mental Health Outpatient Housing Unit
5	MHSDS	Mental Health Services Delivery System
6	NKSP or North Kern	North Kern State Prison
7	OHU	Outpatient Housing Unit
8	OIG	Office of the Inspector General
9	PBSP or Pelican Bay	Pelican Bay State Prison
10	PCP	Primary Care Provider
11	PLRA	Prison Litigation Reform Act
12	PSH or Patton	Patton State Hospital
13	PSU	Psychiatrist Services Unit
14	PVSP or Pleasant Valley	Pleasant Valley State Prison
15	R&R	Reception and Receiving
16	RC	Reception Center
17	RJD or Donovan	Richard J. Donovan Correctional Facility
18	RN	Registered Nurse
19	SAC or Sacramento	California State Prison/Sacramento
20	SATF	California Substance Abuse Treatment Facility (II)
21	SCC or Sierra	Sierra Conservation Center
22	SHU	Segregated Housing Unit
23	SM	Special Master in the <i>Coleman</i> case
24	SNY	Special Needs Yard
25	SOL or Solano	California State Prison/Solano
26	SQ or San Quentin	California State Prison/San Quentin
27	SVPP	Salinas Valley Psychiatric Program
28	SVSP or Salinas Valley	Salinas Valley State Prison
	TB	Tuberculosis
	TTA	Triage and Treatment Area
	UHR	Unit Health Records
	VSPW or Valley State	Valley State Prison for Women
	VPP	Vacaville Psychiatric Program
	WSP or Wasco	Wasco State Prison
	ZZ Cell	Makeshift Temporary Cells Outside of Clinic Areas

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**INTRODUCTION**

I, Jeanne Woodford, declare:

1. I have personal knowledge of the matters set forth herein, and if called as a witness, I could competently so testify. I make this declaration in support of Plaintiffs' Opposition to Defendants' Motion to Terminate Relief in *Coleman v. Brown*.

**I. EDUCATION, BACKGROUND, AND EXPERIENCE WITH CDCR**

2. I received my B.A. from Sonoma State University in 1978. Since that time, I have experience working at all levels of California correctional facilities.

3. In 1978, I became a correctional officer at San Quentin. I worked for the California Department of Corrections and Rehabilitation (CDCR) for the next 27 years in various custodial and management positions, including Correctional Counselor, Program Administrator, Captain, Litigation Coordinator, Associate Warden, Chief Deputy Warden and eventually the Warden of San Quentin from 1999 through 2004.

4. In March 2004, Governor Schwarzenegger appointed me as the Director of what was then the California Department of Corrections. On July 1, 2005, the California Department of Corrections was reorganized and renamed the California Department of Corrections and Rehabilitation. In July 2005, Governor Schwarzenegger appointed me to be the Undersecretary for the CDCR and then the acting Secretary of the Department. I retired from the CDCR in July 2006.

5. From November 2006 until May 2008, I was the Chief Adult Probation Officer for the City and County of San Francisco. In that position, my responsibilities included the administration of the Adult Probation Department, formulating policies and plans for the rehabilitation of adult probationers, managing the budgetary and fiscal activities and services of the organization, working with other agencies to improve services for individuals on adult probation, directing the preparation, approval, review and maintenance of records and reports, and cooperating with various social service agencies, law enforcement bodies and interested groups regarding crime prevention programs and services.

1           6.       I am currently the Executive Director of Death Penalty Focus, a non-profit  
2 organization devoted to the abolition of the death penalty. I am also currently a Senior  
3 Distinguished Fellow at the Chief Justice Earl Warren Institute on Law and Social Policy  
4 at the University of California-Berkeley.

5           7.       I have been involved in evaluations and needs studies for federal, state, and  
6 local correctional facilities, including jail needs studies for the Placer County Jail and for  
7 the cities of Kirkland and Bellevue, Washington. I also participated in investigations of  
8 various civil rights complaints filed by ICE detainees confined in a county correctional  
9 facility in Pinal County, Arizona in 2011. From 2007 through 2010, I was a member of a  
10 task force on the American Bar Association (ABA) Criminal Justice Standards on the  
11 Treatment of Prisoners.

12           8.       In the past seven years I have spoken at more than 60 meetings and  
13 conferences regarding correctional issues, and I have testified before the California State  
14 Legislature and Congress on at least 12 occasions. I have also taught courses regarding  
15 corrections policy in California at Sonoma State University in 2009 and 2010 and through  
16 Stanford University's Continuing Studies program in 2011.

17           9.       In the last five years, I testified as an expert witness in the three-judge  
18 overcrowding trial in the *Plata v. Brown* and *Coleman v. Brown* cases. *See Coleman v.*  
19 *Schwarzenegger*, 2009 U.S. Dist. LEXIS 67943, *aff'd sub nom. Brown v. Plata*, 563 U.S.  
20 \_\_\_, 131 S. Ct. 1910 (2011). I was not compensated for that testimony.

21           10.      A complete description of my educational and employment background is set  
22 forth in my resume and curriculum vitae, which are attached as **Appendix A**.

23           11.      All of my positions with the CDCR included work with prisoners with  
24 mental illness. While a correctional officer, one of my responsibilities was to escort  
25 prisoners to their mental health appointments. As a supervisor in housing units, I was  
26 responsible for ensuring that correctional officers did the same. As a correctional  
27 counselor, I advocated for inmates to be examined by mental health staff. As a manager at  
28 San Quentin and at CDCR headquarters I worked with mental health staff and court-

1 appointed personnel on the improvement of mental health care delivery both at San  
2 Quentin and in the Department generally.

3 12. During the early part of my career at San Quentin, the provision of mental  
4 health services there was governed by the settlement agreement in *Marin v. Rushen*, rather  
5 than by any orders of the *Coleman* court. The *Marin* case came to a close while I was an  
6 administrator at San Quentin, and we worked from that time forward to bring San Quentin  
7 within the *Coleman* framework. As a result, I am very familiar with the *Coleman* case and  
8 requirements.

9 13. I continued to work to improve mental health delivery within the prisons,  
10 within the *Coleman* framework and more generally, while serving as Director,  
11 Undersecretary, and Acting Secretary of the CDCR. The extremely high prison population  
12 during my tenure hampered our efforts in this regard. For example, it was very difficult to  
13 transfer inmates between prisons for appropriate and proper reasons, such as providing  
14 more efficient delivery of services to inmates with similar care needs.

15 **II. FOUNDATION FOR EXPERT OPINIONS IN THIS ACTION**

16 14. I have been asked to provide an expert opinion in this matter. I am being  
17 compensated for my time spent preparing this declaration in this matter at a rate of \$150  
18 per hour or \$1500 per day, and for any time spent testifying in this matter at a rate of \$800  
19 per half day or \$1600 per day.

20 15. My opinions, as detailed below, are based upon my years of correctional  
21 experience, my review of documents provided to me, and an inspection of the facilities and  
22 programs at San Quentin conducted on February 26, 2013. A list of documents provided  
23 to me by Plaintiffs' counsel is attached as **Appendix B**. I also reviewed a number of  
24 documents produced by Defendants subsequent to my site inspection, including copies of  
25 CDCR form 114a custody logs for 20 inmates, classification call sheets for a sample of  
26 condemned inmates who are participants in the Mental Health Services Delivery System  
27 (MHSDS), and classification and Rules Violation Report (RVR) documents copied from  
28 seven of the ten central files that I reviewed while at San Quentin.

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16. The photographs attached as **Photo Exhibits A, B and C**, and explained below, were taken during my site inspection by a uniformed San Quentin custody officer of locations within the prison that I personally visited and viewed.

17. During my inspection of San Quentin, I spoke with a number of correctional administrators, clinical staff, and line correctional officers, sergeants, and lieutenants. I also conducted confidential interviews with four inmates who are participants in the mental health delivery system, as well as one non-confidential interview with an inmate during which two custody officers remained present, and one cell front interview.

**III. EXPERT OPINIONS IN THIS MATTER**

**A. The Unique Needs of Condemned Inmates**

18. At the time of my site inspection, there were currently 691 condemned inmates housed at San Quentin in three main areas – the East Block, the Adjustment Center, and North Segregation. It is also my understanding that several condemned inmates are housed within the Correctional Treatment Center (CTC) on a permanent or semi-permanent basis, either for medical reasons or as participants in the “Specialized Care for the Condemned” mental health program. I toured each of these areas during my site inspection. My overarching opinion with respect to the mental health needs of the condemned population is that while there have been great improvements, the program offered to the condemned inmates and the policies applicable to them are insufficient to address their particular and unique concerns.

19. I have reviewed Defendants’ expert report prepared by Dr. Dvoskin, Dr. Scott, and Dr. Moore, and was surprised to find that these experts did not speak to or apparently even assess the adequacy of the mental health services provided to the condemned population. Defendants’ experts’ opinions regarding the excellence of the CDCR’s mental health screening, referral, and treatment systems entirely fail to take into account the functioning of those systems with respect to the condemned population, which is at high risk for mental health problems. It is my understanding that Defendants’ experts

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1 conducted a two-day site inspection of San Quentin, including of the units where  
2 condemned prisoners are housed. It is also my understanding that Defendants' experts  
3 were asked not to assess the Specialized Care for the Condemned program, which I  
4 understand to be a major feature of the mental health program offered to the condemned  
5 population.

6       20. Condemned inmates present unique custodial challenges that can complicate  
7 their mental health status and treatment process. Condemned inmates have even less  
8 control than the general prison population over their housing assignments, their  
9 programming options, and certainly their lengths of stay in prison. All of these factors are,  
10 in my experience, significant mental health stressors. In order to adequately address their  
11 mental health needs, custody and mental health staff must work closely together to develop  
12 and operate an effective, coherent program that proactively addresses these unique  
13 custodial challenges.

14       21. On the headquarters level, I experienced during my tenure at San Quentin  
15 and at the CDCR a systematic failure to properly account for the needs of those on death  
16 row. I saw no evidence during my present review to indicate that this problem has been  
17 ameliorated. For example, I reviewed a COMPSTAT data report containing information  
18 about inmate characteristics, disciplinary incidents, appeals data, and programming  
19 participation, all of which in my experience was critical to appropriate management of the  
20 institution. The report did not identify inmate numbers delineated according to the three  
21 distinct missions of San Quentin (Reception Center, Condemned, and General Population).  
22 It also failed to provide any usable information about the numbers of condemned inmates  
23 who are classified as Grade A (in my experience, a designation meaning that those inmates  
24 are given as many privileges as possible, similar to general population inmates, despite  
25 remaining in high-security housing) or Grade B (a designation meaning that those inmates  
26 are given limited privileges and for custodial purposes treated in a manner similar to

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1 administrative segregation or security housing unit (SHU) inmates).<sup>1</sup> In the absence of this  
2 data, it seems very difficult if not impossible to make appropriate decisions about the  
3 condemned population, including decisions about the provision of space and staffing  
4 sufficient to properly manage their mental health needs.

5       22. On the institution level, my conversations with institution staff throughout  
6 the course of my inspection reflected a consistent failure to appropriately consider the  
7 unique nature of death row in institution decision-making. For example, North  
8 Segregation houses Grade A condemned inmates and permits them to mingle with one  
9 another in open areas of the tiers for several hours a day. It is quieter and, from a custodial  
10 perspective, more open than East Block or the Adjustment Center, and thus is widely  
11 considered the most desirable housing location for condemned inmates. However, when I  
12 visited, I was informed that there are no MHSDS inmates housed in North Segregation.  
13 There does not appear to be a specific institutional policy preventing MHSDS inmates  
14 from being housed in North Segregation; however, it is clear that inmates believe this to be  
15 the policy and believe that if they are diagnosed as needing mental health care, they will be  
16 moved away from North Segregation. This is a significant disincentive that very likely  
17 could preclude an inmate from seeking necessary care, and one that San Quentin has  
18 evidently made no effort to address. It is also my understanding that North Segregation  
19 inmates are not provided with regular monitoring of their mental health status by either  
20 custody or mental health staff. That is, they do not receive the regular casual custodial  
21 contact that non-segregation inmates receive, because the unit is designed to maintain  
22 physical barriers between inmates and staff. This type of contact is important as it allows  
23 custody staff to monitor inmates for signs of mental health deterioration. Nor do inmates

24 \_\_\_\_\_  
25  
26 <sup>1</sup> The distinction between Grade A and Grade B inmates also affects their level of mental  
27 health monitoring, as it is my understanding that Grade A, non-MHSDS condemned  
28 inmates housed in East Block and North Segregation receive mental health staff rounding  
only twice per month, even though those units are for other purposes considered  
segregated housing units.

1 in North Segregation receive the frequent mental health rounding and cell front status  
2 checks required for segregation inmates, because as I was informed while visiting the unit,  
3 mental health staff perform rounds there only twice per month. Therefore, the  
4 opportunities for mental health staff to monitor these inmates for signs of deterioration are  
5 very limited.

6 23. It is also my opinion that new arrivals on death row should be closely  
7 monitored for signs of mental health deterioration or crisis. I was informed during my site  
8 inspection that there were three newly-condemned inmates who had recently arrived at San  
9 Quentin and who were all housed in the Adjustment Center. Staff in that housing unit  
10 were not able to immediately identify those individuals and did not appear to have made  
11 any particular provisions for monitoring them. I was also informed that none were  
12 *Coleman* class members, but it was unclear whether mental health screening had yet  
13 occurred for those individuals. It is my experience that newly-condemned inmates often  
14 experience extreme mental health distress and suicidal ideation. The lack of a specific  
15 protocol or practice for monitoring of such inmates reflects the lack of an organized plan  
16 for the mental health screening and treatment of condemned inmates that takes their unique  
17 circumstances into account.

18 24. With respect to inmates who have spent many years on death row, San  
19 Quentin does not appear to have a coherent way to regularly assess whether those inmates  
20 are experiencing mental health deterioration. It is my understanding that the average  
21 length of stay on California's death row is 25 years. Condemned inmates do not transfer  
22 between prisons in the way that other inmates do over the course of this long incarceration,  
23 nor do they routinely experience changes in custody status of the sort that would trigger  
24 mental health evaluations for non-condemned inmates. As a result, they are not regularly  
25 re-evaluated for their mental health needs.

26 25. During my tenure at San Quentin, I worked with Dr. Ponath, a senior San  
27 Quentin mental health staff member, to establish a system and a schedule to complete a  
28 mental health evaluation of every condemned inmate. This systematic reassessment was

1 conducted in late 2003 or early 2004, and to the best of my knowledge, was the last such  
2 complete mental health reassessment of every condemned inmate. I was surprised to learn  
3 during my site inspection that regular mental health screenings of condemned inmates who  
4 are not currently participants in the mental health delivery system are not provided.

5 26. During my visit to San Quentin, I was provided with data indicating that only  
6 25 of 691, or 3.6%, of the condemned population are receiving mental health services at  
7 the Enhanced Outpatient Program (EOP) level of care. This seemed significantly lower  
8 than I would expect based upon my experience working with condemned inmates, whom I  
9 found to be substantially more prone to severe depression and other mental health  
10 problems than the general prison population. Although an additional 156 condemned  
11 inmates are reportedly receiving mental health services at the Correctional Clinical Case  
12 Management System (CCCMS) level of care, the low percentage of EOP inmates  
13 indicates to me a serious problem with under-assessment of condemned inmates' mental  
14 health needs.

15 27. Separate from any generalized assessment program, during my site  
16 inspection, I inquired of staff how they monitor condemned inmates for mental health  
17 deterioration. The answers I received indicated that there is informal monitoring by  
18 custody staff but that there is no regularly conducted screening or testing. I was also  
19 informed that there are no written protocols requiring mental health assessment of inmates  
20 whose behavior I would consider a mental health "red flag," for example, inmates who  
21 refuse to attend yard or take showers on a regular basis.

22 28. I reviewed CDCR form 114a custody logs in each of the housing units we  
23 visited where MHSDS inmates were housed. Custody officers are required to record  
24 detailed information on the 114a log regarding all services as well as regular and  
25 significant daily activities offered for each inmate in segregated housing conditions,  
26 including those on death row. During my tenure at San Quentin, I relied upon these logs to  
27 assess whether inmates were receiving adequate yard time, whether custodial staff on  
28 particular units were adhering to policies regarding yard and shower offerings, and

1 whether particular individuals were refusing to leave their cells. I consider the 114a logs  
2 to be the best and most accurate source of information about the daily activities of inmates,  
3 including about abrupt changes in particular inmates' usual patterns that may reflect  
4 mental health issues.

5 29. Many of the 114a logs that I reviewed during my February inspection did not  
6 demonstrate that adequate yard time had even been offered to the particular inmates, and  
7 many of the logs reflected alarmingly high rates of refusals of yard time and/or showers.  
8 On East Block in particular, many 114a logs spanning the three weeks prior to my  
9 inspection did not contain *any* documentation of offered yard time at all. I also saw in the  
10 114a logs many examples of inmates whose pattern of yard and/or shower refusal would  
11 have lead me to refer them for mental health assessment had I encountered them while  
12 working at San Quentin.

13 30. Subsequent to my site inspection, Defendants produced expanded samples of  
14 the 114a logs for my review. Attached as **Exhibit 12 to the Confidential Declaration of**  
15 **Jane Kahn Filed under Seal** are the 114a logs for one inmate whose records were  
16 produced in that sample, whom I understand to be a participant in the MHSDS system at  
17 the CCCMS level of care. This condemned inmate was housed in East Block from the  
18 beginning of the logs produced (October 5, 2012) through February 12, 2012. There is no  
19 documentation that this inmate attended *or was even offered* yard of any kind from  
20 October 5, 2012 through February 12, 2013. As noted in the 114a log instructions, offered  
21 and refused yard time should be recorded in Column 2 of each sheet. In addition, during  
22 this entire four-month period, the 114a logs reflect that this inmate showered only five  
23 times. He also frequently refused cleaning materials for his cell. Beginning on December  
24 30, 2012, this inmate began to refuse meals and trash pickup on a near-daily basis, but was  
25 not seen by mental health staff for more than a week. After he was "cleared" by mental  
26 health staff on January 7, 2013, this inmate continued to refuse meals, trash pickup,  
27 showers, and cleaning supplies throughout January and February. This inmate then had to  
28 be forcibly extracted from his cell on February 12, 2013 because he would not submit to

1 having his vital signs taken for purposes of monitoring an influenza outbreak in East  
2 Block, according to other documents produced by Defendants that I have reviewed. He  
3 was then transferred to the Adjustment Center where the 114a logs document his  
4 continued refusals of yard time and showers. He also refused to be interviewed by me  
5 during my site inspection, according to staff in the Adjustment Center. This is an excellent,  
6 if dreadful, example of the utility of the 114a logs in detecting mental health deterioration  
7 by death row inmates. It is my opinion that this inmate should have been transferred for  
8 mental health evaluation immediately following the forcible cell extraction, and that his  
9 activities as reflected in the 114a logs from the Adjustment Center indicate that he remains  
10 in urgent need of a referral for mental health evaluation.

11       31. I selected several individuals to interview based on the information contained  
12 within their 114a logs related to rates of yard and shower refusal. Many, if not all, of the  
13 individuals to whom I spoke appeared to me to be in need of higher levels of mental health  
14 care than they were receiving. For example, I spoke with a condemned inmate, currently  
15 housed on East Block, who identifies as a transgender woman. This Caucasian individual,  
16 who appeared to be in her early 30s, had long hair and a feminine presentation. She was  
17 willing to engage with me about her mental health care and status. She reported to me that  
18 she does not attend group yard because of safety concerns, which I believe may relate to  
19 her transgender status and feminine appearance. I reviewed documents in this inmate's  
20 central file which indicated to me that she was removed from assignment to a group yard  
21 on August 8, 2012 pending an investigation of her safety concerns, and that the  
22 investigation remained ongoing as of October 24, 2012. Inmates with safety concerns or  
23 those who cannot participate in group yards attend yard in walk-alone yard cages.  
24 Attached as **Photo Exhibit A** to this declaration is a photograph of a walk-alone yard  
25 space on the "yard side" of East Block. This inmate reported to me that in lieu of  
26 appropriate accessible out-of-cell activities, she spends up to 10 hours per day pacing in  
27 her cell. My review of this inmate's central file and mental health records, which reveal a  
28 history of mental health crisis bed stays, hunger strikes, concerns about her high risk of

1 self-mutilation, and suicide attempts, indicate to me that although this inmate is designated  
2 as being at the EOP level of care, she is in need of a higher level of mental health care than  
3 can be provided at San Quentin. I would have referred her for an evaluation regarding her  
4 need for such care had I encountered her while working at San Quentin.

5 32. I spoke with another condemned inmate in East Block who reported that he  
6 goes to yard only about one time per month, and only to the walk-alone yard space as  
7 pictured in **Photo Exhibit A**. As this space is under a roof, this inmate reported to me that  
8 he sees the sun only about once a week for about five minutes at a time when he goes to  
9 mental health groups in the Correctional Treatment Center (CTC), a hospital building  
10 located near East Block. This Hispanic individual who appeared to be in his late 40s  
11 seemed to be very seriously depressed with a troubling flat affect. He was willing to speak  
12 with me, but offered very short and non-elaborative answers. My review of this inmate's  
13 central file indicated that he is assigned to a walk-alone yard space by his own request, and  
14 that he has a history of reported suicidal ideation and inpatient hospitalizations. Although  
15 his mental health records indicate he is designated as being at the EOP level of care, I  
16 would have referred him for an evaluation regarding his possible need for a higher level of  
17 care than can be provided at San Quentin had I encountered him while working at San  
18 Quentin.

19 33. During my tenure at San Quentin I found that condemned inmates routinely  
20 failed to attend their classification hearings, which are conducted approximately every 90  
21 or 120 days, or more frequently if circumstances warrant. An inmate's failure to  
22 participate in classification committee hearings eliminates an important source of  
23 information regarding an inmate's mental health status, and further contributes to the need  
24 for an organized program of periodic re-assessment of condemned inmates' mental health  
25 needs. I reviewed 10 central files of condemned inmates with serious mental illness during  
26 my site inspection, all of whom are currently or were previously identified to Plaintiffs'  
27 counsel as participants in the Specialized Care for the Condemned Program, and it appears  
28 to continue to be the case that condemned inmates do not attend their classification



1 hearings. For example, I reviewed the central file of an inmate who has, based upon the  
2 documentation provided to me, not attended a classification committee hearing since  
3 August 5, 2004. In the intervening years, the classification committee has discussed him  
4 in absentia approximately 22 times. A second inmate apparently has not attended a  
5 classification committee hearing in more than five years, since August 16, 2007. A third  
6 inmate has not attended a hearing in nearly five years, since May 22, 2008. Another  
7 inmate has attended his classification committee hearing only twice since August 2006, in  
8 July and September 2009. He has thus apparently not attended a classification committee  
9 hearing in more than three years.

10 34. Further, although I did not review the central files of condemned inmates not  
11 already identified as *Coleman* class members, it is my experience that many condemned  
12 inmates who are not identified as requiring mental health services do in fact require such  
13 care. In the absence of any comprehensive program of re-assessment and in the absence of  
14 an inmate's participation in classification committee hearings, there appears to be no  
15 adequate mental health screening mechanism in place on death row.

16 **B. Crowding and Staffing in Units for the Condemned**

17 35. I testified before the three-judge court that, in my opinion, at least five  
18 percent of housing within a prison or system should be vacant in order to manage the  
19 movement of prisoners appropriately. This remains my opinion. Without a five percent  
20 vacancy rate, it is very difficult to permit movements of prisoners so as to ensure  
21 appropriate housing and delivery of medical and mental health care.

22 36. I am aware that in April 2011, the Governor announced that he was  
23 cancelling a long-planned project to construct a new housing facility for condemned  
24 inmates. According to documents I have reviewed, this project would have provided  
25 housing for 1,152 condemned inmates and added visitor, medical, and mental health  
26 facilities to accommodate the needs of that inmate population. My understanding is that  
27 the project was cancelled for budgetary reasons. To my knowledge, no subsequent plan or  
28 proposal has been put forth to properly accommodate California's rapidly growing death



1 row population.

2 37. At the current time, there is insufficient capacity to appropriately house the  
3 growing condemned population within the units currently used for that purpose. I was  
4 informed during my site inspection that there are seven cells remaining among the non-  
5 segregation units housing condemned inmates. It is my understanding that San Quentin  
6 receives an average of two newly-condemned inmates per month. Thus, in approximately  
7 four months, the condemned population will exceed the cell space set aside for it.

8 38. I was informed during my inspection that a plan has been submitted to  
9 CDCR Headquarters to allow the expansion of the condemned population into D (Donner)  
10 section, which I understand to be currently housing general population inmates. Plaintiffs'  
11 counsel requested a copy of such a proposal, to the extent that any exists in writing, and  
12 did not receive any documentation thereof. In my experience, even if such a proposal is  
13 currently pending at the Headquarters level, it will take longer than three months to  
14 adequately convert D section to housing suitable for the condemned and to hire, or retrain,  
15 staff sufficient to operate D section as condemned housing. It is also my recollection that  
16 there are no office spaces within D section that would be suitable for use either by mental  
17 health staff or for mental health treatment, which would require additional custody staff to  
18 routinely transport inmates from that area to the CTC for mental health care.

19 39. It is also my opinion that there appears to be inadequate physical space  
20 within the existing condemned housing units to provide appropriate recreational activities  
21 that, in my experience, are critical to the maintenance of long-term mental health stability.  
22 For example, I was told that the walk-alone area on the "yard side" of East Block is used  
23 both for EOP recreational therapy and other groups, and for exercise time for inmates who  
24 require a higher-security yard. I was not provided with any documentation of an organized  
25 plan and schedule permitting both uses to be carried out in a manner that allows adequate  
26 time for both.

27 40. Inmates who attend open group yards on the "bay side" of East Block  
28 reportedly have to choose between yard time and attendance at scheduled treatment

1 activities, because they are required to remain out on the yard for the entire four hours they  
2 are scheduled to be there without regard to other appointments. The “bay side” group  
3 yards are also reportedly extremely crowded, with over 50 inmates using one small section  
4 of the yard at a time. Attached as **Photo Exhibit B** is a photograph of one of the group  
5 yards on the “bay side,” and reflects the paucity of space available for the use of such a  
6 large number of inmates.

7 41. Generally speaking, there did not appear to be enough yard space across the  
8 units housing condemned inmates to accommodate all of those inmates. During my tenure  
9 at San Quentin, Grade A condemned inmates received up to six hours of yard time a day,  
10 seven days a week. I was informed during my site inspection that condemned inmates on  
11 group yard are offered yard time every other day for up to four hours and that condemned  
12 inmates assigned to walk-alone yards are offered up to 10 hours of yard time per week, but  
13 the 114a logs that I reviewed do not support this. Based on my understanding of the  
14 various uses to which the walk-alone yards are put (for exercise, for therapeutic groups,  
15 and for recreational therapy groups), and on the numbers of inmates assigned those yards,  
16 there does not appear to be adequate space for every inmate who is assigned to attend the  
17 walk-alone yards to actually do so. I was also informed that inmates as a matter of practice  
18 are not permitted to re-enter the housing unit once they have exited for yard time, which  
19 can be a significant disincentive for inmates assigned to spend four hours in the sunless,  
20 bare, concrete-floored walk-alone cages that precludes them from attending the yard at all.  
21 I reviewed extensive documentation on the units in the form of CDCR form 114a logs, as  
22 detailed in Paragraphs 28 and 29 above, from which it appears that yard time is frequently  
23 not even offered to condemned or administrative segregation inmates.

24 42. In addition to the inadequate physical space on San Quentin’s yards, there  
25 appeared to me to be insufficient resources available on the yards to allow for adequate  
26 and appropriate programming. I spoke with a recreational therapist during my visit who  
27 was conducting a group activity among inmates who were using separate walk-alone  
28 cages. He informed me that San Quentin’s recreational therapists must purchase at their

1 own expense equipment—in this case, a board game set—for use in their programs. I also  
2 observed on the group yards that there is very little seating, and was told that one inmate  
3 was permitted to carry a bucket out to the yard as an accommodation for his mobility  
4 impairment. As noted above, inmates are not generally permitted to re-enter the housing  
5 unit once they have exited for yard; the limited resources available on the group yards can  
6 be a disincentive that precludes the increasing number of older and mobility-impaired  
7 inmates from accessing any yard time at all.

8 43. It also remains my opinion, as at the time of my prior testimony before the  
9 three-judge court, that adequate numbers of custodial staff are necessary to provide  
10 prisoners with timely access to medical and mental health care. Custody staff are required  
11 to escort inmates to mental health services, not only for routine appointments but also  
12 when inmates are in need of emergency or urgent treatment. In addition, custody staff play  
13 a crucial role in alerting mental health providers when prisoners are experiencing mental  
14 health deterioration or crises. It is essential to the well-being and indeed the survival of  
15 prisoners with mental health needs that custodial officers perform these functions. I was  
16 informed by one lieutenant with whom I spoke during my site inspection that the new  
17 standardized staffing model does not provide San Quentin with sufficient custodial staff to  
18 meet its needs. I was also concerned to discover during my visit that, although it is my  
19 understanding that the EOP administrative segregation “hub” at San Quentin is scheduled  
20 to close in the near future, staff at the institution seemed unaware of this pending closure  
21 and were unable to speak to its ramifications for custody staffing in the institution as a  
22 whole. I have also reviewed documents indicating that there is no dedicated mental health  
23 staffing for condemned inmates as a whole, and certainly insufficient mental health  
24 staffing for the specialized care program.

25 **C. The Specialized Care Program**

26 44. I was asked to review the Specialized Care for the Condemned program that  
27 is purportedly offered to treat the mental health needs of certain condemned inmates at San  
28 Quentin. My understanding is that the inmates in the program are those deemed in clinical

1 need of greater than EOP level of care and/or in need of inpatient mental health care. My  
2 understanding is that CDCR's policy is that condemned inmates may not be transferred to  
3 DSH (Department of State Hospitals) intermediate care facility (ICF) inpatient care.

4 45. First, the program as it is currently in operation is too nebulous to fully  
5 evaluate its functionality from a custody perspective. I was given a brief tour of the beds  
6 set aside within the CTC for this program, and I believe that it could operate effectively  
7 given appropriate trained staffing and resources. However, I saw no evidence that such  
8 staffing has yet been designated or trained. I inquired as to whether there was adequate  
9 staffing and was told in vague terms that there was "enough," but was not offered any  
10 specifics. For example, I was told by an institution psychiatrist that inmates housed in the  
11 CTC for purposes of the Specialized Care Program would have access to yard space on  
12 East Block for treatment groups and for exercise. But transporting inmates to East Block  
13 for these purposes would require significant custodial staff time and effort, and I neither  
14 saw nor was told of any evidence of a staffing plan that would permit such yard usage.

15 46. I have reviewed an August 15, 2011 status report prepared by San Quentin  
16 staff regarding the provision of care to participants in the Specialized Care program, as  
17 well as several other status reports and memoranda regarding the program. All of the  
18 memoranda I reviewed reflected serious concerns regarding the role and participation of  
19 custody staffing in implementing an effective specialized care program for condemned  
20 inmates. Most troublingly, the August 15, 2011 memorandum, attached as **Exhibit 13 to**  
21 **the Sealed Declaration of Jane Kahn**, indicated that for approximately two weeks, little  
22 to no mental health services were provided as a result of an unexplained conflict between  
23 custody and mental health staff regarding scheduling of activities. In my experience, it is  
24 extraordinary for institution staff to have prepared a memorandum of this nature, and the  
25 events recounted herein reflect a serious breakdown in protocols and expectations.  
26 Subsequent documents indicated that this had been resolved, although did not specify in  
27 what manner or whether steps had been taken to prevent a recurrence of the issue. I also  
28 reviewed documents indicating that institutional staff has long been aware of the need for

1 increased custody and mental health staffing for the specialized care program, and has  
2 gotten little to no support from headquarters in securing that staffing. It is troubling to me  
3 that more than 18 months subsequent to the August 15, 2011 memorandum, San Quentin  
4 was still unable to provide specifics regarding the custody staffing or protocols for the  
5 specialized care program. This is another aspect in which the program, as it exists today,  
6 is too vaguely defined to be properly evaluated.

7         47.     Second, in my opinion, there is no custodial justification for a categorical  
8 ban on transferring condemned inmates to intermediate inpatient care at appropriate, high-  
9 security DSH facilities, such as those located inside of Salinas Valley State Prison (SVSP)  
10 or California Medical Facility (CMF). Instead of the blanket ban currently imposed to  
11 prevent condemned inmates from accessing care, a policy requiring individualized  
12 assessment of the mental health needs and security concerns of each individual prior to  
13 transfer for ICF care should be developed and implemented. Such an individualized  
14 assessment should consider case-specific factors such as age, disability, legal status, and  
15 disciplinary history. It is my opinion that were such an assessment conducted of the  
16 individuals currently receiving “specialized care” at San Quentin, many if not all would be  
17 deemed both in need of a transfer to ICF care and suitable for such a transfer from a  
18 custodial perspective.

19         48.     Part of such an individualized assessment would likely be to examine the  
20 Rules Violation Report (RVR) histories of each of the individuals, which in my experience  
21 provides a window as to their overall level of security risk. I reviewed ten years of RVR  
22 histories for ten individuals whom I was told were either presently or previously on the list  
23 of participants in the Specialized Care Program, and saw nothing in these histories  
24 supporting the conclusion that these individuals could not be safely transferred to ICF care  
25 if in need of such care. For example, one of the individuals has had only one RVR in his  
26 more than 25 years on death row, which he received when he was the victim of an assault  
27 in 1987. Another individual had no RVR more recent than 1995, and that for a non-violent  
28 offense (the destruction of a blanket in his cell); a third individual had no RVR more recent

1 than 1999, and that for failing to maintain an acceptable level of hygiene in his cell – often  
2 a key indicator to custody staff that an inmate is experiencing mental health deterioration.  
3 A fourth individual, whose central file contained many documents regarding hunger strikes  
4 and generally reflected a serious need for mental health care, did not have any RVRs at all.  
5 None of these individuals present risks greater than those of Level IV high-security non-  
6 condemned inmates who are routinely permitted access to ICF programs. Even the  
7 individual with the most recent RVRs, from 2009 and 2011 for racially-charged outbursts  
8 directed at staff, appeared to me to be an individual in need of significant mental health  
9 intervention, and not an individual too dangerous to receive such care. A second  
10 individual received an RVR in 2009 for delaying a peace officer after he reported suicidal  
11 ideation. Again, every indication is that this inmate requires a very significant level of  
12 mental health care and should, at the very least, be carefully assessed regarding his need  
13 and suitability for inpatient care.

14         49. It is my experience and understanding that condemned inmates are routinely  
15 transferred from San Quentin to various community facilities for medical care. In my  
16 opinion, if these transfers are possible and routinely managed from a custodial perspective,  
17 there should be no custodial bar to effecting similar transfers to high-security DSH  
18 facilities. In addition, I am aware that condemned inmates are permitted to transfer to  
19 DSH facilities for acute care when necessary, and are able to participate safely in  
20 established DSH acute psychiatric programs (APP) at CMF.

21         50. It is my opinion that, from a custodial perspective, condemned inmates could  
22 also participate safely in established ICF programs at CMF. I am generally familiar with  
23 the facilities and security arrangements at CMF, and believe that it is capable of safely  
24 managing condemned inmates in need of ICF care. I am also informed that there are  
25 unused spaces within the “L Wing” at CMF; it is my opinion that one such space could be  
26 safely used, with appropriate physical modifications, planning and staffing, to provide  
27 inpatient programming to condemned individuals if the CDCR determined them to require  
28 a segregated unit.

1           51. I am informed that various CDCR personnel, including Secretary Beard  
2 during his deposition, expressed opinions to the effect that condemned inmates often prefer  
3 to remain on death row in their so-called community, and that this is offered as a  
4 justification for refusing to transfer condemned inmates for ICF care. Ultimately, any  
5 decisions about whether a condemned inmate is transferred to ICF care should be based  
6 upon his need for such care and not upon staff's views of his preferences.

7 **IV. OTHER OPINIONS REGARDING MENTAL HEALTH CARE DELIVERY**  
8 **AT SAN QUENTIN**

9 **A. The Adjustment Center**

10           52. During my inspection, I also reached a number of conclusions about facilities  
11 and programs at San Quentin that are used by both condemned and non-condemned  
12 *Coleman* class members.

13           53. I visited the Adjustment Center, where it is my understanding that both  
14 condemned and non-condemned administrative segregation inmates are housed. Within  
15 the Adjustment Center, I visited a group room that was dirty and crowded with treatment  
16 cages, some of which were rusty. A photograph of three of the cages in this group room is  
17 attached as **Photo Exhibit C** to this declaration. The room, which I was informed is also  
18 used as a law library, appeared to lack appropriate and safe exits, and generally seemed to  
19 be an unsafe space for both inmates and staff. In my experience, conducting group  
20 treatment in such an environment would be a deterrent both to the institution's ability to  
21 staff the program, and to inmates' willingness to participate in treatment.

22           54. I was also informed by a senior psychiatrist who accompanied me on my  
23 inspection that groups held in the Adjustment Center have neither a settled and predictable  
24 mental health staff member leading the group, nor a regular roster of inmates attending the  
25 group. It is my experience that inmates with mental health needs are most likely to attend  
26 group treatment if they know both who will be leading a particular group and who else will  
27 be attending. The policy or practice of providing stability in neither respect to inmates in  
28 the Adjustment Center is a deterrent to their accessing needed mental care.



1           55. I was also very concerned that in the Adjustment Center, three inmates  
2 refused to come out of their cells when I requested to interview them. I selected these  
3 inmates to interview based upon the high rates of yard and shower refusals reflected in  
4 their 114a logs. One such high-refusal inmate who was willing to come for an interview,  
5 held non-confidentially with custody staff remaining in the room, appeared to be openly  
6 paranoid and delusional. In spite of his clean appearance, this African-American  
7 individual expressed a variety of delusions, including that he was being subjected to some  
8 kind of electroshock therapy in his housing at the Adjustment Center. I also found it  
9 unusual that the presence of custody staff in this interview did not preclude this inmate  
10 from openly expressing his delusions. My conversation with him highlights that there can  
11 be a discrepancy between an inmate's outward appearance and his actual mental health  
12 status, and emphasizes the need for regular assessment of individuals who do not routinely  
13 leave their cells. I was told, and this inmate's health records confirm, that he is CCCMS.  
14 Had I encountered him while working at San Quentin, I would have referred him for a  
15 mental health evaluation as a very likely candidate for a higher level of care.

16           56. While in the Adjustment Center, I observed a prominent sign stating that "all  
17 inmates must be 'stripped out' upon return from any appointment held outside the"  
18 Adjustment Center, including mental health appointments. I understand this to mean that  
19 Adjustment Center inmates are subject to strip searches after returning from, *e.g.*, the CTC  
20 where many mental health appointments and groups are held. In my opinion, this policy  
21 may create a deterrent to care for some inmates and, while it may be necessary in the case  
22 of individuals housed in the Adjustment Center as a result of legitimate security concerns,  
23 need not necessarily apply to every Adjustment Center inmate. The blanket application of  
24 this policy to every inmate housed in the Adjustment Center, regardless of an individual's  
25 actual security risk, is a further negative ramification of the fact that the condemned  
26 housing units are operating at levels of crowding that preclude custody staff from making  
27 individualized housing and security decisions, and that the Adjustment Center is housing  
28 more different types of inmates with various custodial needs than can be properly



1 managed.

2 57. I am aware that it is currently CDCR policy to provide 30 minute wellness  
3 checks for individuals in administrative segregation, such as the Adjustment Center, only  
4 for the first 21 days that an individual is in administrative segregation. I have reviewed the  
5 Declaration of Walter Kautzky, filed in 2006 in this matter, and agree with his position,  
6 which is also the standard of the American Correctional Association, that all administrative  
7 segregation inmates should be observed by a correction officer at least every 30 minutes.  
8 *See* Declaration of Walter L. Kautzky in Support of Plaintiffs' Objections to Defendants'  
9 Plan to Address Suicide Trends in Administrative Segregation Units, Oct. 31, 2006,  
10 Docket No. 2012. I am informed that Defendants' experts Dr. Joel Dvoskin and Dr. Jackie  
11 Moore also endorsed this position during their depositions in this matter. In particular, I  
12 agree that 30 minute welfare checks permit the identification of mental health and  
13 custodial crises before they escalate, and that they permit the faster identification and  
14 prevention of suicide attempts. It is my understanding that current CDCR policy requires  
15 such checks only within the first 21 days of an inmate's confinement to administrative  
16 segregation; CDCR should expand 30 minute welfare checks to all administration  
17 segregation and condemned inmates without delay.

18 **B. The Mental Health Assessment Process in RVR Adjudications**

19 58. I observed a complete RVR adjudication hearing for one individual, and part  
20 of a hearing for a second. Both individuals were non-condemned inmates housed, to my  
21 understanding, in Carson section, an administrative segregation unit.

22 59. In the case of the complete RVR hearing that I observed, the inmate had  
23 received the RVR for refusing a transfer from administrative segregation to general  
24 population housing and will now be referred to classification with a recommendation for a  
25 SHU term, after having been found guilty. A mental health assessment had been  
26 conducted for this CCCMS prisoner but, in my opinion, did not provide any helpful  
27 substantive input. The inmate's reasons for refusing the transfer were unclear and were  
28 apparently not explored by mental health prior to the hearing or by the adjudicating officer

1 at the hearing, but in my experience, inmates with mental health issues often view transfers  
2 to mainline housing and to shared cells with great, if resolvable, trepidation. It would have  
3 been helpful to have had more substantive input from mental health and/or to have had his  
4 mental health clinician at the hearing. In my opinion, this is not an inmate who presents a  
5 danger meriting an expensive SHU placement; his concerns about transfer to the mainline  
6 at San Quentin could very likely have been addressed without resorting to use of limited  
7 SHU resources as a punishment. Following this inmate's probable SHU term (which may  
8 be served at San Quentin due to a backlog in transferring inmates sentenced to SHU terms  
9 or may require transfer to another facility), the issue underlying this RVR will have  
10 remained unaddressed and unresolved. It is thus very likely to result in subsequent  
11 unnecessary RVRs. I interviewed this inmate at cell front following the hearing, but was  
12 not able to adequately explore this issue with him given the setting.

13         60. During the RVR hearing time that I observed, another inmate refused to  
14 attend the hearing for an RVR he had received for refusing to attend a mental health  
15 appointment. The hearing officer dismissed the RVR without input from the inmate. I  
16 received confusing information from the hearing officer about whether and how mental  
17 health staff would follow-up on the refusal to attend the hearing. Upon reviewing this  
18 inmate's health records records, I became aware that he recently spent ten months in a  
19 DSH inpatient program, and has only recently returned to San Quentin where he is housed  
20 in administrative segregation. The circumstances surrounding this RVR, the hearing, and  
21 the lack of a clear protocol for follow-up following a refusal to attend the hearing do not  
22 seem custodially appropriate to me for an inmate whose mental state is clearly quite  
23 fragile. Nor was it apparent why this prisoner was housed in administrative segregation  
24 upon his return from a DSH psychiatric hospitalization.

25         **C. Suicide Prevention / Emergency Response**

26         61. I have reviewed the internal CDCR suicide reports for suicides completed at  
27 San Quentin from 2010 through August 2012, a total of eight suicides. I have the  
28 following opinions regarding three of the suicides, which I found particularly problematic

1 in various custodial respects.

2           62. I have reviewed the report of an August 28, 2010 suicide by an inmate  
3 housed in North Segregation, who apparently had no contact with mental health staff  
4 between approximately 1990 and his death. As discussed above in Paragraphs 24-26, I  
5 find the lack of an organized screening program or process for long-term death row  
6 inhabitants troubling. In addition, this inmate's suicide was precipitated by the  
7 commutation of his sentence to life without parole and his fears about moving to a general  
8 population prison, which in my opinion should have triggered a mental health evaluation.  
9 I was also very concerned to note the conclusion of the suicide reviewer that this inmate  
10 was found in rigor mortis at least several hours prior death. It is my understanding that  
11 custody officers in North Segregation are required to check inmates' wellbeing at least  
12 once per hour, which should have precluded this long interval between death and  
13 discovery.

14           63. I have reviewed the report of a November 17, 2011 suicide by a condemned  
15 inmate housed on East Block. The suicide report reflects that this inmate, who was  
16 admitted to San Quentin in 1999, was seen only six times by mental health clinicians in  
17 more than a decade on death row. The last contact, approximately four months before the  
18 inmate's suicide, concluded that he was not in need of further mental health services.  
19 Again, I am concerned that San Quentin's lack of a protocol for the regular complete  
20 evaluation of long-term condemned inmate's mental health states may have played a factor  
21 in permitting this inmate to slowly deteriorate within intervention. In addition, as in the  
22 suicide reviewed above, this inmate was found in a state of rigor mortis indicating death  
23 several hours before discovery, notwithstanding custody orders requiring hourly fire and  
24 security checks on East Block. The suicide reviewer questioned the veracity of  
25 documentation reflecting the completion of such checks, given the inmate's condition upon  
26 discovery. I share that concern.

27           64. I have reviewed the report of a May 27, 2012 suicide by a condemned inmate  
28 housed on East Block. The suicide report reflects that this inmate was a participant in the

1 MHSDS at the CCCMS level of care. In my opinion, the suicide report does not  
2 adequately assess the role that staff harassment may have played in this suicide. The  
3 inmate complained about a particular staff member harassing him and getting other  
4 inmates to harass him, particularly following televised reports of his crime. The inmate  
5 was either delusional about this harassment or it was actually a problem; in either case, the  
6 circumstances surrounding the allegation merit more investigation than they appear to have  
7 received. For example, the suicide reviewer does not appear to have looked for or  
8 reviewed any CDCR form 602 appeals filed by this inmate about the alleged harassment.  
9 It is also significant to me that the suicide reviewer noted that the inmate could not have  
10 moved cells in order to get away from his harassers without finding another inmate with  
11 whom to switch cells. This is an effect of East Block's, and death row's, operation at full  
12 capacity levels.

13         65. I am more broadly concerned about the high number of appeals filed by  
14 inmates at San Quentin that are "screened out," that is, not answered on their merits by  
15 institution staff. The COMPSTAT data that I reviewed in advance of my site inspection  
16 indicated that in December 2012, 416 of 482 appeals, or approximately 86%, were  
17 screened out. In my experience, this indicates that there are a very significant number of  
18 inmate concerns that are not being addressed, potentially including issues like the above  
19 inmate's allegations of staff harassment. It is also concerning to me that the number of  
20 appeals even filed by inmates has dropped significantly, with 175 fewer appeals filed in  
21 December of 2012 than in January of 2012. This decline limits the information available  
22 to staff regarding inmates' needs, including their mental health needs.

23         66. I also reviewed the California Prison Health Care Services "Death Review  
24 Summary" and related documentation for an inmate who died in the San Quentin CTC  
25 MHC unit while on 1:1 suicide watch on December 20, 2010. The review concluded that  
26 this was an unintentional overdose rather than a suicide. I was gravely concerned about  
27 the missing and incomplete reports from the individuals involved in the inadequate and  
28 inexplicably delayed response to this inmate's need for emergency medical care. In

1 particular, it appears that the Certified Nursing Assistant (CNA) tasked with the 1:1  
2 observation was the first to notice the inmate's serious medical condition, but that  
3 individual did not sound a medical emergency alarm. Instead, the CNA notified a  
4 Registered Nurse within the unit, who notified a physician. But the alarm was ultimately  
5 not sounded until 10 minutes after a correctional counselor stated that someone needed to  
6 see the inmate, and CPR did not commence for 24 minutes after that statement. During my  
7 tenure at San Quentin, the CDCR's rule was that any staff member who saw a medical  
8 emergency was required to sound an alarm without delay. I am informed that current  
9 policy is that CNAs are not permitted to speak with inmates on suicide watch, which may  
10 in part explain why the CNA did not investigate the inmate's status and sound an alarm.  
11 In any event, this death reflects a dramatic failure on the part of CDCR staff to  
12 appropriately respond to a serious medical emergency when one was experienced by  
13 someone on suicide watch.

14

15 I declare under penalty of perjury under the laws of the United States and the State  
16 of California that the foregoing is true and correct, and that this declaration is executed at  
17 San Francisco, California this 14<sup>th</sup> day of March, 2013.

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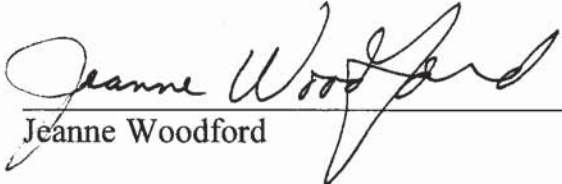
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Jeanne Woodford

# **PHOTO EXHIBIT A**

SQ Walk-Alone Yard Space on the “Yard Side” of East Block





## **PHOTO EXHIBIT B**

SQ Group Yard Space on “Bay Side” of East Block







# **PHOTO EXHIBIT C**

SQ Adjustment Center: Treatment Cages in Group Room



**APPENDIX A TO DECLARATION OF  
JEANNE WOODFORD**

*Jeanne S. Woodford*

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Benicia, CA 94510  
Home: (707) 746-1712  
Cell: (707) 853-0928  
E-mail: [jeannewoodford@comcast.net](mailto:jeannewoodford@comcast.net)*

**OBJECTIVE:** **Utilize my experience in criminal justice to improve public safety through evidence based practices and reform.**

**EDUCATION:**

*1974 - Associate of Arts Degree  
Santa Rosa Junior College  
Santa Rosa, California  
Liberal Arts*

*1978 - Bachelor of Arts Degree  
Sonoma State University  
Rohnert Park, California  
Criminal Justice, emphasis on Psychology and Sociology*

**CAREER EXPERIENCE:**

**11/10 to Present Senior Fellow Berkeley Center for Criminal Justice**

Work on a variety of criminal justice projects. Provide leadership and assistance to Student interns engaged in criminal justice policy development.

**4/11 to Present Executive Director Death Penalty Focus**

Death Penalty Focus  
870 Market St. Suite 859  
San Francisco, Ca. 94102

Provide leadership and management of Death Penalty Focus, a non-profit dedicated to the mission of ending the death penalty.

**5/86 to PRESENT Correctional Consultant and Educator**

*Involved in volunteer and contract work to improve the criminal justice system. I have been a guest speaker at UC Berkeley Law School, Stanford Law School, Stanford School of Public Policy, Santa Clara School of Law and various community groups. I have written Op-Ed pieces and testified in front of US Congress and the California Legislature. I have taught criminal justice classes at Sonoma State University and Stanford. I am currently consulting on a federally funded Women's Reentry grant for the City and County of San Francisco. I have served as an expert witness in death penalty cases.*



*11/06 to 05/08*

***Chief Adult Probation Officer, San Francisco Adult Probation Department***

*Management and leadership of the San Francisco Adult Probation Department: I lead staff through a strategic planning process to establish the goals, values and mission of the San Francisco Adult Probation Department. Assisted staff with implementation of evidence based practices and began caseload management focused on successfully completing probation. I also meet with the Mayor, the Courts, the District Attorney, the Public Defender, the Sheriff and Community Groups to improve communication and the effectiveness of the Probation Department. Budget: Eleven Million Dollars.*

*07/05 to 07/06*

***Appointed by Governor Arnold Schwarzenegger: Undersecretary of the California Department of Corrections and Rehabilitation (CDCR)***

*Responsibilities included leading major policy, program and organization change; representing the Administration before the Legislature, Department of Finance, and other state, federal, and local government, and constituent group. Provide administrative direction to all CDCR staff. Chaired the Corrections Standard Authority and the Prison Industries Board. I also lead efforts to bring accountability to the CDCR through data driven decision-making. I continued my efforts to advocate for rehabilitation and a sentencing commission for California. Budget: Eight billion dollars.*

*03/04 to 07/05*

***Appointed by Governor Arnold Schwarzenegger: Director Department of Corrections***

*Responsible for the administration of 32 State prisons, 38 conservation camps, more than 185 parole units, and contracts with 50 public or private community-based facilities or centers. In this capacity, I served as the Chair, Prison Industry Board. As the Director I worked with the Secretary of the Agency to add Rehabilitation to the mission of the CDC. I also lead efforts to address conditions of confinement for inmates to include overcrowding, health care and mental health care. I advocated for the expansion of visiting for the incarcerated and their families. I also started the gender responsive commission to create policies and appropriate programs for women incarcerated in the CDC. Budget: Six billion dollars.*

**02/99 to 02/04**

**Warden San Quentin State Prison**

*Responsible for the leadership and management of San Quentin State Prison. San Quentin has three primary missions: Reception Center, condemned housing, and a level II general population. Developed and implemented programs for prisoners including The Success Dorm; the first reentry program in a California prison. Budget: One hundred and ten million dollars.*

**08/97 to 02/99**

**Chief Deputy Warden  
San Quentin State Prison  
San Quentin, CA 94964**

*Directly responsible for the day-to-day operation of San Quentin State Prison: 1,500 staff and a prisoner population of 5,800. Budget: \$110,000,000*

**04/96 to 8/97**

**Associate Warden, Correctional Facility  
San Quentin State Prison  
San Quentin, California 94964**

*Directly responsible for managing San Quentin's Central Services Division. Primary responsibility for perimeter security, yards, gates, wall posts, dining hall, Receiving and Release and visiting and mail programs. Additional responsibilities include the position of San Quentin's Equal Employment Opportunity (EEO) Coordinator. Managed a custody personnel budget of \$56,000,000.*

**06/78 to 4/96**

***Held a variety of positions within the California Department of Corrections to include: Correctional Officer, Correctional Counselor, Program Administrator and Captain. I was also the Litigation Coordinator for three years, which provided extensive experience with court compliance and monitoring.***

**APPOINTMENTS:**

- *Walden House Board of Directors*
- *Prison Industries Authority Board Member (appointed by California Senate Rules Committee)*
- *Governors Leadership Institute*
- *Class A (non-alcoholic) Trustee with the General Services Board for Alcoholic Anonymous*
- *John Jay College of Criminal Justice Advisory Committee*
- *Governors Technology Services Board for the Department of technology Services*
- *Council on Mentally Ill Offenders (Chair)*
- *Correctional Standards Authority (Chair)*
- *Friends Outside Sacramento Chapter (Honorary Chair)*

**CURRICULUM VITAE OF JEANNE S WOODFORD**

<u>DATE</u>	<u>TITLE</u>
March 19, 2004	California Judicial Council in Monterey - Speaker
April 21, 2004	Senate Budget Sub 2 Committee Hearing - Speaker
April 22, 2004	Briefing Director's Introduction Remarks Little Hoover Commission
May 4, 2004	Opening Statement (Senator Romero) Hearing
May 5, 2004	Assembly Oversight Hearing-Budget - Speaker
May 21, 2004	Medal of Valor-California State Capitol-Speaker
June 1, 2004	Joint Hearing Assembly Committee on Health - Speaker
June 8, 2004	Friends Outside Annual Dinner-Keynote Speaker
June 23, 2004	Confirmation Opening Remarks Senate Rules
June 28, 2004	Statewide Training of Chief Probation Officers – Keynote Speaker
August 16, 2004	Mule Creek State Prison Media Event with the Governor - Speaker
August 23, 2004	NOVA Conference Speaker
September 13, 2004	5 <sup>th</sup> Annual Centerforce Inside/Out Summit – Keynote Speaker
September 15, 2004	League of Women Voters-Speaker
September 17, 2004	Odyssey-Speaker
September 29, 2004	Legislative Hearing “The Inmate Health Care Challenge: Fixing a Broken System in Light of the Deukmejian Report” (Senate Select Committee on Government Oversight and Senate Select Committee on the California Correctional System) - Speaker
October 9, 2004	California Judges Association Conference in Monterey-Panel w/Senator Jackie Speier
December 8, 2004	Sonoma State University Perspective on the Future - Speaker
January 2005	Article: Managing Death Row – co-writer. Appeared in Managing Special Populations in Jails & Prisons text
February 8, 2005	Senate Select Committee on the California Correctional System (Hearing on Racial Segregation in Prisons) – Speaker
February 23, 2005	Sonoma County Peace Officer of the Year Banquet-Keynote Speaker
March 10, 2005	Harvard University, John F. Kennedy School



**CURRICULUM VITAE OF JEANNE S WOODFORD**

	of Government Forum-Panel on Corrections – Panel Member
March 16, 2005	Forensic Mental Health Conference Speaker
<u>DATE</u>	<u>TITLE</u>
April 21, 2005	Citizen’s Advisory Committee Conference, Opening Remarks
April 23, 2005	California Correctional Supervisor’s Organization Keynote Speaker
April 24, 2005	Hospitals & Institutions Conference Speech
May 12, 2005	Alcoholic’s Anonymous Volunteers in Parole Keynote Speaker
May 25, 2005	Rehabilitation Conference Speaker
June 6, 2005	National Institute of Corrections Faith-Based Conference. Washington D.C. – Speaker
June 14, 2005	Friends Outside Annual Dinner Speaker
June 24, 2005	Basic Correctional Officer Academy Graduation – Speaker
July 20, 2005	California Youth Authority Medal of Valor – Speaker
July 27, 2005	Channel City Club Keynote Speaker
October 17, 2005	Educators Keynote Speaker-Lake Tahoe
October 20, 2005	Employers Forum “San Diego County’s Undiscovered Labor Resource” (Community Reentry Project) Keynote Speaker
October 21, 2005	Basic Correctional Officer Academy Graduation – Speaker
January 25, 2006	Little Hoover Commission (Sacramento) Opening Remarks
February 1, 2006	Fire Chiefs Return to Work Coordinators Conference – Opening Remarks
February 2, 2006	Senate Hearing “Have California’s Prisons Been Rehabilitated” – Speaker
May 19, 2006	Medal of Valor Speaker-California State Capitol
May 23, 2006	Coalition of Alcohol and Drug Associations Public Policy Conference – Morning Speaker
May 27, 2006	Sonoma State Commencement Exercises
June 8, 2006	American Institute of Architects National Convention and Design Exposition – Speaker
August 2006	Los Angeles Times article titled: “Why I quit the Prison System”
November 27, 2006	Speaker at USC Annenberg Institute for Justice and Journalism

**CURRICULUM VITAE OF JEANNE S WOODFORD**

February 4, 2007	Article: The Future of Prison Design featured in the American Institute of Architect's magazine
May 18, 2007	Sonoma Learning – Sonoma State University Speaker
July 14, 2007	Judicial Council of California Symposium – Speaker
July 17, 2007	Sonoma State – Speaker
September 6, 2007	Northern California Service League – 12 <sup>th</sup> Annual Reentry Conference – Speaker
September 11, 2007	Hastings Law School, San Francisco – Speaker
October 23, 2007	Eighth Annual Inside/Out Summit – Critical Juncture – Innovative Solutions for Addressing the Impacts of Youth & Adult Incarceration in our communities – Speaker
November 2007	Association of Women Executives in Corrections – Speaker
November 28, 2007	White House Faith & Community Initiatives National Summit on Prisoner Re-entry – Speaker
January 23, 2008	USC Annenberg Institute for Justice and Journalism – Speaker
March 4, 2008	Center for Collaborative Solutions (CCS) Annual Labor Management Conference – Presenter/Speaker
March 14, 2008	UC Berkeley – Violence Conference – Speaker
March 15, 2008	USF – Symposium – Solutions for California Prisons – Speaker
March 31, 2008	John Jay College of Criminal Justice – Speaker
April 22, 2008	Testified before the US Subcommittee on Crime, Terrorism, and Homeland Security in support of revising the Prison Litigation Reform Act
May and June 2008	Review and audit of the San Mateo Youth Services Center following and escape of a youth facing an adult trial as an adult
September 24, 2008	Testified before the California Legislative Subcommittee in support of Proposition 5
October 7, 2008	Centerforce Summit Forum panel participant, Rohnert Park California
October 10, 2008	Berkeley Law Center Conference panel

**CURRICULUM VITAE OF JEANNE S WOODFORD**

October 2008	Signed rebuttal to argument in favor of Proposition 9 for the California General Election official voter information guide
November 6, 2008	American Institute of Architects speaker regarding design influence on corrections
November 8, 2008	Panel participant with American Institute of Art and Design discussing the influence of Architectural design on criminal justice reform
January 2009	Appointing to the Prison Industries Authority (PIA) Board by Senate Rules
February 3, 2009	Testified as an expert before the Federal Three Judge Panel regarding the impact of overcrowding on health care and mental health treatment.
February 27, 2009	Speaker Berkeley Criminal Justice Forum
March 9, 2009	Speaker Sonoma State University Criminal Justice Forum
March 19, 2009	Speaker Hastings School of Law, Defining the Problem-The State of Criminal Justice in Ca.
April 2009	Entered into 5 month contract with Drug Policy Alliance to develop criminal justice policy strategy for Ca.
May 2009 through August 2009	Volunteered consulting services at the request of Legislators working on Ca. Correctional budget issues
May 2009	Editorial in San Diego Tribune regarding corrections and accountability
June 30, 2009	Guest speaker The Fellowship Forum, a group of Stanford graduates and Hewitt Packard executives
August 12, 2009	Interviewed for Time Magazine regarding corrections in Calif. (On-line edition)
August 13, 2009	Interviewed for NPR- All Things Considered, regarding correctional issues in Ca.
September and October 2009	Taught a series of classes at Sonoma State University entitled Overview of Corrections
September 2009	Jail needs study Cities of Kirkland and Bellevue, Washington.
October 1, 2009	Guest Speaker Saint Mary's College Moraga, Ca.
October 2, 2009	Guest Speaker University of California Berkeley
October 21, 2009	Taught class to Los Angeles Public Defenders

**CURRICULUM VITAE OF JEANNE S WOODFORD**

	Office "An Overview of California Prisons"
October 27, 2009	Lead panel discussion regarding Criminal Justice and the State of California
October 2009 to present	Contracted for Needs Study Placer County Jail
February 2010	Contracted to assist implementing the Second Chance Reentry Grant for the City and County of San Francisco
February 2010	ABA Criminal Justice Standards on Treatment of Prisoners completed. I was a member of the task force for a portion of the five-year project.
April 12, 2010	Appeared on Pod Cast regarding Correctional Reform for the UC Berkeley Criminal Justice Center
April 13, 2010	Taught six week course at Sonoma State University regarding the State of Corrections in California
May 11, 2010	Testified before the Ca. Legislature regarding Options for Improving Prison Operations and Outcomes
June 30, 2010	Testified before the Ca. Legislature regarding SB 399, The Fair Sentencing for Youth Act.
September and October 2010	Taught six week course at Sonoma State University regarding the State of Corrections in California
November 3, 2010	Attend Cal RAPP training and participate in strategic planning to assist SF Adult Probation to implement evidence based practices and procedures.
November 9, 2010	Began as a Senior Fellow at the Berkeley Center for Criminal Justice.
November 15, 2010	Guest speaker for Dr. Barbara Bloom regarding corrections in California; Sonoma State University
November 17, 2010	Panelist at the American Society of Criminologist.
November 18, 2010	Testified before the Little Hoover Commission Topic: Reorganization of the California Department of Corrections
December 2, 2010	Three Strikes Conference Stanford University
January 4, 2010	Speaker Hastings Law School Topic: Corrections in California
January 7, 2011	Presenter SALT Award to the Prison Law Office for Human Rights work.
January 20, 2011	Speaker UC Irvine Topic: Death Penalty and California Criminal Justice

**CURRICULUM VITAE OF JEANNE S WOODFORD**

February 8, 2011	Speaker-Stanford for Professor Nation, Public Policy class
February 22, 2011	Speaker-Stanford School of Law, Joan Petersilia class on Criminal Justice
March 31, 2011 thru May 19, 2011	Attorney General transition team meeting-Smart on Crime Project
April 5, 2011	Speaker-1 <sup>st</sup> Congregation Church of Sonoma
April 6, 2011	Speaker-UC Berkeley Criminal Justice Course
April 18, 2011	Speaker-UC Berkeley, Dr. Krisberg Class
April 26, 2011	Speaker-Mills College, Death Penalty Symposium
April 2011 to present	Expert Armstrong v. Brown, United States District Court Northern District of California C-94-2307 CW ADA Case.
May 2011 to present	Expert for New York State Office of Children and Family Services regarding violence in NY Juvenile Secure facilities.
May 2, 2011	Speaker-USC 3-Strikes Conference
May 3, 2011	Speaker Oakmont Symposium Topic: The State of Corrections
May 10, 2011	Speaker-SF Public Defender's Conference on Criminal Justice
June 7, 2011	Guest Speaker-Bob Edwards KQED
June 26, 2011	Guest Speaker-CVS Channel 5
June 28, 2011	Guest Speaker National Latino Peace Officers Sonoma County Chapter
August 1, 2011	Guest Ron Owen Radio Show KGO
August 4, 2011	Guest Pacifica Radio
August 8, 2011	Guest KCEO Radio, Kent Peters Show
August 10, 2011	Speaker Chevron Retirees Luncheon Topic Criminal Justice in California
August 11, 2011	Speaker Junior State of America, Sacramento, Ca.
August 14, 2011	Guest KGO Lara Starr Producer
August 17, 2011	Testified before Ca. Legislative Appropriations Committee regarding SB 490 bill to place death penalty on the Ca. ballot
August 30, 2012	Debate San Mateo DA Wagstaff SF ACLU
September 13, 2011	Speaker Fountain Grove Men's Club topic: Criminal Justice in Calif.
September 15, 2011	Speaker Solano Reentry Council Topic: The importance of Reentry Councils
September 22, 2011	Guest KGO Peter Collins Show
September 24, 2011	Guest Speaker PAX Christi Event in LA

**CURRICULUM VITAE OF JEANNE S WOODFORD**

	regarding the Death Penalty
October 13, 2011	Speaker Hastings Law School Professor Blocks class
October 27, 2011	Participated in Realignment Panel Hastings Law School.
November 3, 2011	Speaker Mt. Diablo Peace and Justice Conference
November 6, 2011	Speaker Ignatius Church San Francisco
November 13, 2011	Speaker Grace Episcopal Church Bakersfield, Ca. Topic: The Death Penalty
November 14, 2011	Speaker California State University Bakersfield
November 29, 2011	Speaker Rotary Club of San Francisco
November 30, 2011	Speaker Berkeley Women's Club
December 6, 2011	Speaker Marin Bar Association Topic: The Death Penalty in California
December 14, 2011	Guest KCBS Jeff Ball Host
January 9, 2012	Guest KQED Cate Cochran CBC Radio Canada
January 10, 2012	Speaker Saint Mary's College Speakers Series
January 17, 2012	Speaker Trinity United Methodist Church
January 17, 2012	Speaker Sisters of Saint Joseph of Orange
January 18, 2012	Speaker Law Offices of the Public Defender Riverside
January 18, 2012	Speaker Scripps College Balch Hall
January 25, 2012	Speaker for the showing of the movie Incendiary, The Metreon San Francisco
January 26, 2012	Speaker San Ramon Valley Democratic Club
January 31, 2012	Speaker Women of Westminster Tiburon
February 1, 2012	Speaker Merage School UC Irvine event held in SF
Fall Semester 2012	Professor UC Hastings School of Law Course: Overview of Criminal Justice
February 6, 2012	UCLA Law School Forum on the death penalty
February 11, 2012	Panel Hastings School of Law Topic: Realigning California's Criminal Justice System
February 16, 2012	Speaker Los Altos Country Club
February 24, 2012	LMU Restorative Justice Panel
February 26, 2012	Speaker Berkeley Sunday Gathering Topic: Death Penalty
March 1, 2012	Safe Ca Signature Filing Press Conference
March 7, 2012	Speaker Sacramento Jesuit High School
March 14, 2012	Speaker SF Academy of Architecture for Justice

**CURRICULUM VITAE OF JEANNE S WOODFORD**

March 16, 2012	Speaker Caleb Foote Symposium UC Berkeley Topic: Realignment
April 5, 2012	Guest Canadian Radio the Matt Holmes Show
April 12, 2012	Debate Saint Mary's College Death Penalty LA Deputy DA Stirling
April 16, 2012	Speaker UC Berkeley Professor C Gardner
April 19, 2012	Speaker Santa Clara University School of Law
April 24, 2012	Panel Golden Gate University topic: Death Penalty
April 27, 2012	Speaker ACLU Sonoma County Annual Dinner
May 8, 2012	Speaker The Arthur Benjamin High School Sacramento
May 10, 2012	Guest Student Radio Station El Cerrito
May 14, 2012	Speaker Heald College Concord
May 16, 2012	Guest Bruce Robinson Radio Show Rohnert Park
May 17, 2012	Speaker Diocese of San Diego
May 20, 2012	Speaker Sunday Gathering Pacific Palisades
May 21, 2012	Speaker Young Democrats LA.
June 5, 2012	Speaker Ron Owen Show KGO Radio
June 7, 2012	Speaker Sheriffs Association Meeting Placer Co.
June 17, 2012	Speaker Unitarian Universalist Breakfast Forum San Francisco
June 27, 2012	LA Press Victims Press Conference
July 25, 2012	KTVU Radio Interview
July 26, 2012	Speaker Vanguard Court Watch of Yolo County
August 13, 2012	Guest KRXA Hal Ginsberg show
August 16, 2012	Speaker Democratic Women Club Monterey
August 17 <sup>th</sup> , 2012	Speaker St. Paul's Episcopal Church Monterey
August 18, 2012	Speaker Old Mission Church Monterey
August 19, 2012	Speaker United Methodist Church Atascadero
August 30, 2012	Debate Death Penalty DA Wagstaff
September 7, 2012	Speaker Marin Library Mill Valley
September 12, 2012	KQED Forum Radio Guest
September 13, 2012	Speaker UC Berkeley, Professor David Onek
September 18, 2012	Testified before California Legislature Prop 34
September 20, 2012	Speaker Safe Ca. Event LA
September 25, 2012	Speaker USF ST Thomas More Society
September 25, 2012	Speaker Christ the King Church Pleasant Hill
September 27, 2012	Speaker Stanford University Law School
September 27, 2012	Speaker Stanford Chapter of the NAACP
September 30, 2012	Debate Asian Pacific Islander Political Forum



**CURRICULUM VITAE OF JEANNE S WOODFORD**

	Sacramento Deputy Sacramento DA
October 2, 2012	NPR Richard Gonzales
October 5, 2012	Speaker California Agriculture Leadershi
October 7, 2012	Speaker Holy Families Catholic Church LA
October 9, 2012	Catholic Press Conference Church of Saint Raphael and Mission San Rafael
October 23, 2012	Debate Prop 34 Congregation Sha'ar DA Wagstaff
October 24, 2012	Speaker Alamo Woman's Club Walnut Creek
October 25, 2012	Guest Democracy Now
October 25, 2012	San Jose Mercury News on line Debate Death Penalty McGregor Scott
October 26, 2012	Guest Fox Radio
October 29, 2012	Guest KALW Radio
November 1, 2012	Guest KCBS Radio
November 8, 2012	Capitol Weekly Panel Post-Mortem Conference 2012 Election
November 13, 2012	Guest KQED radio
November 21, 2012	Guest KQED radio host Dick Gordon
November 28, 2012	Faculty Miller Implementation Training Conference Atlanta, Georgia
December 9, 2012	Recipient of the Chief Justice Earl Warren Civil Liberties Award ACLU of Northern California
January 31, 2013	Speaker UC Berkeley Wine and Crime event
February 6, 2013	Panelist in Sonoma State University career day
February 8, 2013	Awarded the June Morrison-Tom Gitchoff Founders Award Western Society of Criminologist

**APPENDIX B TO DECLARATION OF  
JEANNE WOODFORD**

**APPENDIX B TO THE DECLARATION OF JEANNE WOODFORD**

<b>DOCUMENT</b>
Decl. Of Jeanne Woodford ISO Pls.’ Renewed Motion To Require Defs. To Track And Accommodate Needs Of <i>Armstrong</i> Class Members Housed In County Jails And Ensure Access To A Grievance Procedure And Motion To Enforce 2001 Permanent Injunction, 8/4/11 [Dkt. 1913]
Notice Of Motion And Motion To Terminate Under The Prison Litigation Reform Act [18 U.S.C. § 3626(b)] And To Vacate The Court’s Judgment And Orders Under Federal Rule Of Civil Procedure 60(b)(5), 1/7/13, [Dkt. 4275]
Memorandum Of Points And Authorities ISO Motion To Terminate Under The Prison Litigation Reform Act [18 U.S.C. § 3626(b)] And To Vacate The Court’s Judgment And Orders Under Federal Rule Of Civil Procedure 60(b)(5), 1/7/13, [Dkt. 4275-1]
Decl. of Laura Ceballos ISO Motion To Terminate Under The Prison Litigation Reform Act [18 U.S.C. § 3626(b)] And To Vacate The Court’s Judgment And Orders Under Federal Rule Of Civil Procedure 60(b)(5), 1/7/13, [Dkt. 4275-2]
Decl. of Diana Toche ISO Motion To Terminate Under The Prison Litigation Reform Act [18 U.S.C. § 3626(b)] And To Vacate The Court’s Judgment And Orders Under Federal Rule Of Civil Procedure 60(b)(5), 1/7/13, [Dkt. 4275-3]
Decl. of Debbie J. Vorous ISO Motion To Terminate Under The Prison Litigation Reform Act [18 U.S.C. § 3626(b)] And To Vacate The Court’s Judgment And Orders Under Federal Rule Of Civil Procedure 60(b)(5), 1/7/13, [Dkt. 4275-4]
Exhibit 1 to Vorous Decl., 1/7/13, [Dkts.4275-5 through 4275-9]
Exhibit 2 to Vorous Decl., 1/7/13, [Dkt. 4279]
Decl. Of Rick Johnson ISO Motion To Terminate Under The Prison Litigation Reform Act [18 U.S.C. § 3626(b)] And To Vacate The Court’s Judgment And Orders Under Federal Rule Of Civil Procedure 60(b)(5), 1/7/13, [Dkt. 4276]
Decl. Of Tim Belavich ISO Motion To Terminate Under The Prison Litigation Reform Act [18 U.S.C. § 3626(b)] And To Vacate The Court’s Judgment And Orders Under Federal Rule Of Civil Procedure 60(b)(5), 1/7/13, [Dkt. 4277]

3JC: Notice Of Motion And Motion To Vacate Or Modify Population Reduction Order; Memorandum Of Points And Authorities ISO Motion, 1/7/13, [Dkt. 2506]
3JC: Decl. Of Robert A. Barton ISO Defs.' Motion To Vacate Or Modify Population Reduction Order, 1/7/13, [Dkt. 2507]
3JC: Decl. Of Jeffrey Beard, Ph.D, ISO Defs.' Motion To Vacate Or Modify Population Reduction Order, 1/7/13, [Dkt. 2508]
3JC: Defs. Response To Oct. 11, 2012 Order To Develop Plans To Achieve Required Prison Population Reduction, 1/7/13, [Dkt. 2511]
3JC: Decl. Of Brenda Grealish ISO Defs.' Response To Order To Develop Plans To Achieve Required Prison Population Reduction, 1/7/13, [Dkt. 2512]
3JC: Decl. Of Kathleen Allison ISO Defs.' Response To Order To Develop Plans To Achieve Required Prison Population Reduction, 1/7/13, [Dkt. 2513]
3JC; Decl. Of Michael Stainer ISO Defs.' Response To Order To Develop Plans To Achieve Required Prison Population Reduction, 1/7/13, [Dkt. 2514]
Decl. of Chris Meyer ISO Motion To Terminate Under The Prison Litigation Reform Act [18 U.S.C. § 3626(b)] And To Vacate The Court's Judgment And Orders Under Federal Rule Of Civil Procedure 60(b)(5), 1/7/13, [Dkt. 4278]
Special Master 25 <sup>th</sup> Round Monitoring Report Re Defs.' Compliance, 1/18/13, [Dkt. 4298]
Special Master's Report On Expert Patterson's report re Suicides in 2011, 1/25/13 [Dkt. 4307]
Dr. Raymond Patterson's Expert Report re: CDCR Suicides in 2011, 1/25/13, [Dkt. 4308]
Special Master's 2011 Suicide Report Redacted List
Pls.' Response To Defs.' Objections And Motion To Strike Or Modify Portions Of The Twenty-Fifth Round Monitoring Report Of The Special master (Fed. R. Civ. P. 53), 2/11/13, [Dkt. 4324]
Decl. Of Jane E. Kahn ISO Of Pls.' Response To Defs.' Motion To Strike Or Modify Portions Of The Twenty-Fifth Round Monitoring Report Of The Special Master (Fed. R. Civ. P. 53), 2/11/13, [Dkt. 4325]
Def's.' Objections And Motion To Strike Or Modify Portions Of Special Master's Report On Suicides Occurring In California Department Of Corrections And Rehabilitation Facilities in 2011, 2/11/13, [Dkt. 4326]
Office Of The Inspector General Use of Force Report, Jan. – June 2012
Office Of The Inspector General Use of Force Report, July – Dec. 2011

Office Of The Inspector General Use of Force Report, Nov. 2011
Article 2 – Use Of Force, Department Of Operations Manual, Updated Through Jan. 1, 2012
CDCR Report To The Special Master re CCCMS Mental Health Assessments, June 3, 2011
10/26/11 CDCR Memo re RVR Training
11/3/11 CDCR Memo re Revision To The Mental Health Assessment Request Process For Rules Violation Reports (Update)
MHSDS Program Guide, Inmate Disciplinary Process and Chps. 5, 6, 10, 12-4-17 to 12-4-21)
Order re Recommendations on Suicide Prevention and Policies, 6/9/05
CACHES Emergency Medical Response, Revised 7/2/12
12/12/08 CDCR Memo re Revised 30 Minute Welfare Check Process
3/5/11 CDCR Memo re MUCH Use Of Mechanical Restraints And Escort Policies
8/29/12 CDCR letter re Completion of Suicide Resistant Beds
12/5/11 Order re Suicide Resistant Beds
8/29/12 Order re Suicide Resistant Beds
<i>Coleman v. Wilson</i> , 912 f. Supp. 1282 (1995) E.D. Cal
<i>Coleman v. Wilson</i> , Findings And Recommendations, 6/6/06, [Dkt. 547]
3JC Opinion And Order re Plata, 8/4/09, [Dkt 2197]
<i>Brown v. Plata</i> , 131 S. Ct. 1910 (2011)
Order To Show Cause re Defs Obj. & Mtn. To Strike Or Modify Portions of 25 <sup>th</sup> Special Master Report, 2/13/13, [Dkt. 4335]
3JC Pls. Opposition To Defs.’ Motion To Vacate Or Modify Population Reduction Order And Counter Motion For Further Relief, 2-12-13, [Dkt. 2528]
Excerpt: SQ Suicides From 2012 Special Master’s Report, [Dkt 4376], 3-13-13
Plaintiffs’ Expert File:Inmate Deaths
SQ Management Report
SQ Institutional Summary: excerpted from Special Master’s 25 <sup>th</sup> Round Monitoring Report on Compliance, 1/18/13 [Dkt. 4298]
SQ Case Studies: excerpted from Special Master’s 25 <sup>th</sup> Round Monitoring Report on Compliance, 1/18/13 [Dkt. 4298]

SQ General Summary: excerpted from Special Master's 23 <sup>rd</sup> Round Monitoring Report on Compliance, 12/1/11 [Dkt. 4124]
SQ Institutional Summary: excerpted from Special Master's 23 <sup>rd</sup> Round Monitoring Report on Compliance, 12/1/11 [Dkt. 4124]
SQ Institutional Case Studies: excerpted from Special Master's 23 <sup>rd</sup> Round Monitoring Report on Compliance, 12/1/11 [Dkt. 4124]
General and SQ Specific: excerpted from 3JC Supplemental Expert Report Of Pablo Stewart, M.D., 10/30/08, [Dkt. 3221]
3JC; Defs. Feb 2013 Status Report On Institution Populations, 2/15/16
CDCR Weekly Population Reports, Jan. 2010 Through Feb. 2013
CCHCS 22 <sup>nd</sup> Tri-Annual Report Of The Federal Receiver's Turnaround Plan Of Action, Sept. 1- Dec 31, 2012, 1/25/13
OIG Report, SQ Medical Inspection Results Cycle 3, 8/2012
Compstat DAI Reports
4/30/10 CDCR Letter To Special Master re Specialized Care
3JC Pls. 2nd Request For Inspection Notice, 2-1-13
3JC Pls. Statement In Response To Oct 11, 2012 Order Re Population Reduction, 1/7/13, [Dkt. 4283]
3JC Decl. Of James Austin ISO Of Pls.' Statement In Response To October 11, 2012, Order, 1/7/13, [Dkt. 4283-1]
3JC Decl. Of Steven Fama ISO Of Pls.' Statement In Response To October 11, 2012, Order, 1/7/13, [Dkt. 4283-2]
3JC Decl. Of Michael W. Bien ISO Of Pls.' Statement In Response To October 11, 2012, Order, 1/7/13, [Dkt. 4283-3]
3JC Pls. Proposed Order 1/7/13, [Dkt 4283-7]
3JC Defs' Response To Oct. 11, 2012 Order To Develop Plans To Achieve Required Prison Population Reduction, 1/7/13, [Dkt 4284]
3JC Decl. Of Brenda Grealish ISO Defs.' Response To Oct. 11, 2012 Order To Develop Plans To Achieve Required Prison Population Reduction, 1/7/13, [Dkt 4285]
3JC Decl. Of Kathleen Allison ISO Defs.' Response To Oct. 11, 2012 Order To Develop Plans To Achieve Required Prison Population Reduction, 1/7/13, [Dkt 4286]
3JC Decl. Of Michael Stainer ISO Defs.' Response To Oct. 11, 2012 Order To Develop Plans To Achieve Required Prison Population Reduction, 1/7/13, [Dkt 4287]

3JC Dec. Of Paul B. Mello ISO Defs.’ Response To Oct. 11, 2012 Order To Develop Plans To Achieve Required Prison Population Reduction, 1/7/13, [Dkt 4288]
eUHR of multiple SQ Inmates
RVR LOP Training Material
1/25/12 DAPO memo re Specialized Care for the Condemned: CTC Expansion
8/15/11 Brief Status Report: Specialized Care For The Condemned, MHSDS San Quentin
5/25/11 DAPO Specialized Care For The Condemned - Budget Hearing Status Report
12/01/11 Executive Status Report: Specialized Care For The Condemned
09/07/11 Brief Status Report: Specialized Care For The Condemned, MHSDS San Quentin
Decl. Of Walter L. Kautzky ISO Pls.’ Objections To Defs.’ Plan To Address Suicide Trends In Administrative Segregation Units, 10/31/06, [Dkt. 2012]
The Future of California Corrections Blueprint, Full Report
Decl. of Jeanne Woodford ISO Of Pls.’ Opposition To Defs.’ Motion To Dismiss And/Or Motion For Summary Judgment/Adjudication, 9/29/08, [Dkt. 3056]
Mental Health Assessment Training
Plaintiffs’ Expert file: Relevant Press Reports, compiled for SQ expert tour
Plaintiffs’ Expert file: Pls.’ <i>Armstrong</i> Monitoring Notes
News Article: “AP Exclusive: Inmate lawsuits cost Calif. \$200M”, The Sacramento Bee, 2/11/13
Plaintiffs’ Expert File: Inmate Deaths and Suicide Reports
Report Of Doyle Wayne Scott, 11/9/07
Report of Ronald Shanksy, 11/9/07
Plaintiffs’ Expert File: Prison Staffing, compiled for SQ Expert Tour
Plaintiffs’ Expert File: Prison Mental Health Care, compile for SQ Expert Tour
Plaintiffs’ Expert File: DSH Report Data (SQ Specific), compiled for SQ Expert Tour
Publication: ACLU Public Safety Realignment, California At A Crossroads
Publication: ACLU Assessment – California Prison Realignment 1 Year Anniversary



News Article: "Jerry Brown cancels plan for \$356-million death row", LA Times, 4-29-11

Cover Letters, Tseng-Woodford re Expert Materials Enclosed