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18	DARRYL DUNSMORE, ERNEST	Case No. 3:20-cv-00406-AJB-WVG
19	ARCHULETA, ANTHONY EDWARDS, REANNA LEVY, JOSUE LOPEZ,	DECLARATION OF ISAIAH
20	CHRISTOPHER NELSON, CHRISTOPHER NORWOOD, and	GLENN IN SUPPORT OF PLAINTIFFS' MOTIONS FOR
21	LAURA ZOERNER, on behalf of themselves and all others similarly situated,	PRELIMINARY INJUNCTION AND PROVISIONAL CLASS
22	Plaintiffs,	CERTIFICATION
23	v. SAN DIEGO COUNTY SHERIFF'S	Judge: Hon. Anthony J. Battaglia
24	DEPARTMENT, COUNTY OF SAN DIEGO, CORRECTIONAL	Trial Date: None Set
25	HEALTHCARE PARTNERS, INC., LIBERTY HEALTHCARE, INC., MID-	
26	AMERICA HEALTH, INC., LOGAN	
27	HAAK, M.D., INC., SAN DIEGO COUNTY PROBATION DEPARTMENT,	
28	and DOES 1 to 20, inclusive, Defendants.	
I		

DECLARATION OF ISAIAH GLENN IN SUPPORT OF PLAINTIFFS' MOTIONS FOR PRELIMINARY INJUNCTION AND PROVISIONAL CLASS CERTIFICATION

[3903205.1]

Case No. 3:20-cv-00406-AJB-WVG

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DECLARATION OF ISIAH GLENN

I, Isiah Glenn, declare:

- 1. I have personal knowledge of the matters set forth herein, and if called as a witness, I could and would competently so testify.
- 2. I have been incarcerated at the San Diego County Jail ("the Jail") since January 13, 2022. I was booked into the Jail at Central, but am currently housed at George Bailey Jail in housing module 1C. My booking number is 2201576. I am 29 years old.
- 3. I estimate that there are approximately 160 men in housing module 1C, which is comprised of four separate housing units each with approximately 40 people. My housing unit has one urinal and two toilets for the approximately 40 people in the unit. The urinal is filthy and disgusting; it is discolored and caked with a fungus or some other kind of deposit that is many different colors. The urinal fills up with water and gets clogged around ten or more times a day. When this happens, the liquid in the bottom of the urinal spills over and dumps out onto the floor of the bathroom, forming a large pool of liquid that, over time, makes its way towards a drain on the floor. People in my housing unit regularly walk through this liquid while in the bathroom, and then track the urine and water mixture throughout the housing unit when they exit the bathroom. Custody staff will not give us mops to use, so we have to use balled-up towels instead. There are lots of gnats in the bathroom, which I think come up through the drain pipes.
- 4. I have no access to any programming at the Jail. There are no rehabilitative programs. There are no Alcoholics Anonymous (AA) or Narcotics Anonymous (NA) programs. There are no individual or group therapy programs. I have not been offered yard access even once since I was incarcerated. I would participate in programs if they were available, especially programs to help with depression and anxiety.

[3880092.1]

DECLARATION OF ISIAH GLENN

- 5. I am mixed race, and am considered "Other" at the Jail as opposed to "White," "Black," or "Mexican." Some custody staff treat people differently according to their race. For example, White deputies are more likely to be responsive to granting requests from White people than Black or Mexican people.
- 6. Race dynamics at the Jail are very tense. Each racial group at the Jail has its own rules, which are enforced by incarcerated people and which are acknowledged and accepted by custody staff. In my housing unit, Others and Blacks share bed space in the dorm. I can pick an empty bed and sleep there as long as it is recognized as an Other or Black bed. However, I cannot choose to occupy an empty White or Mexican bed. If I did so, there would be a fight.
- 7. The Jail is a very dangerous place because fights regularly occur without any intervention from custody staff. Throughout all Jail facilities, George Bailey is widely known as "the Thunderdome" or "the Dome" because there are so many fights at this facility. I have been at George Bailey for about one month, and during this time I have witnessed between ten and fifteen fights. Two days ago, I witnessed a fight where three people beat up another person for saying something that offended them.
- 8. Fights in the Dome typically last a short time under thirty seconds and are conducted in a part of the housing unit that is called "the Pocket." There are numerous Pockets within the George Bailey facility. Pockets are spaces where there are no cameras and guards cannot see what is going on. Many fights occur when one racial group wants to discipline one of their members for not following the rules of that group.
- 9. I have also witnessed fights at Central. For example, about a month and a half ago, I saw a man get his ribs broken in unit 8D. Two White men



[3880092.1]

beat another White man for about 13 seconds because he stole a sandwich. The White victim was mentally ill. Custody staff did not come during the fight. Eventually, they charged an Other man with the assault – even though he was not involved in the fight. The Other man who was charged was also mentally ill.

I want the Jail to be a safer and more hygienic place for all people. I 10. also want the Jail to provide programs like AA, NA, therapy, and yard. Collectively, we are extremely bored and are deprived from activities that would enrich our lives and make us more successful when we return to the community.

I declare under penalty of perjury under the laws of California and the United States of America that the foregoing is true and correct, and that this declaration is executed at San Diego County Jail in San Diego, California this _____th day of

DECLARATION OF ISI