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Superior Court of California,
Sacramento
12/20/2023
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By _____, Deputy
23CV013894

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Attorneys for PLAINTIFFS

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO**

JANE CL-1 ROE, an individual;
JANE LC-2 ROE, an individual;
JANE CB-3 ROE, an individual;
JANE AN-4 ROE, an individual;
JANE SM-5 ROE, an individual;
JANE SH-6 ROE, an individual;
JANE JH-7 ROE, an individual;
JANE MS-8 ROE, an individual;
JANE AJ-9 ROE, an individual;
JANE AH-10 ROE, an individual;
JANE FV-11 ROE, an individual;
JANE SR-12 ROE, an individual;
JANE CN-13 ROE, an individual;
JANE JH-14 ROE, an individual;
JANE RH-15 ROE, an individual;
JANE AM-16 ROE, an individual;
JANE JW-17 ROE, an individual;
JANE TL-18 ROE, an individual;
JANE TA-19 ROE, an individual;
JANE MF-20 ROE, an individual;
JANE RC-21 ROE, an individual;
JANE SC-22 ROE, an individual;
JANE KJ-23 ROE, an individual;
JANE RG-24 ROE, an individual;
JANE TS-25 ROE, an individual;
JANE TM-26 ROE, an individual;
JANE LT-27 ROE, an individual;
JANE MM-28 ROE, an individual;
JANE DW-29 ROE, an individual;
JANE JJ-30 ROE, an individual;
JANE SK-31 ROE, an individual;
JANE JM-32 ROE, an individual;
JANE SM-33 ROE, an individual;

Case No.:

(JCCP No. 5276)

COMPLAINT FOR DAMAGES FOR:

- 1) **SEXUAL ASSAULT**
- 2) **SEXUAL BATTERY**
- 3) **SEXUAL HARASSMENT (CIVIL CODE §51.9)**
- 4) **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
- 5) **VIOLATION OF BANE ACT (CIVIL CODE §52.1)**
- 6) **VIOLATION OF UNRUH ACT (CIVIL CODE § 51)**
- 7) **GENDER VIOLENCE (CIVIL CODE § 52.4)**
- 8) **CONSTRUCTIVE FRAUD (CIVIL CODE § 1573)**
- 9) **NEGLIGENCE**
- 10) **NEGLIGENT HIRING AND SUPERVISION**
- 11) **NEGLIGENT TRAINING**
- 12) **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

DEMAND FOR JURY TRIAL.

BY FAX

1 JANE ED-34 ROE, an individual;
2 JANE AC-35 ROE, an individual;
3 JANE MT-36 ROE, an individual;
4 JANE AC-37 ROE, an individual;
5 JANE AM-38 ROE, an individual;
6 JANE KL-39 ROE, an individual;
7 JANE TP-40 ROE, an individual;
8 JANE JB-41 ROE, an individual;
9 JANE AS-42 ROE, an individual;
10 JANE LW-43 ROE, an individual;
11 JANE KR-44 ROE, an individual;
12 JANE MB-45 ROE, an individual;
13 JANE JD-46 ROE, an individual;
14 JANE SA-47 ROE, an individual;
15 JANE AT-48 ROE, an individual;
16 JANE KG-49 ROE, an individual;
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18 JANE EM-51 ROE, an individual;
19 JANE RE-52 ROE, an individual;
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21 JANE TT-54 ROE, an individual;
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24 JANE AL-57 ROE, an individual;
25 JANE VP-58 ROE, an individual;
26 JANE DK-59 ROE, an individual;
27 JANE LG-60 ROE, an individual;
28 JANE TC-61 ROE, an individual;
JANE SB-62 ROE, an individual;
JANE GE-63 ROE, an individual;
JANE ML-64 ROE, an individual;
JANE TH-65 ROE, an individual;
JANE GH-66 ROE, an individual;
JANE DD-67 ROE, an individual;
JANE DT-68 ROE, an individual;
JANE AG-69 ROE, an individual;
JANE CM-70 ROE, an individual;
JANE NA-71 ROE, an individual;
JANE MT-72 ROE, an individual;
JANE RB-73 ROE, an individual;
JANE LA-74 ROE, an individual;
JANE AV-75 ROE, an individual;
JANE CB-76 ROE, an individual;
JANE BO-77 ROE, an individual;
JANE CM-78 ROE, an individual;
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9 JANE KB-90 ROE, an individual;
10 JANE MM-91 ROE, an individual;
11 JANE CB-92 ROE, an individual;
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13 JANE DR-94 ROE, an individual;
14 JANE MH-95 ROE, an individual;
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JANE HT-116, an individual;
JANE BC-117, an individual;
JANE AW-118, an individual;
JANE JA-119, an individual;
JANE KJ-120, an individual;
JANE RD-121, an individual;
JANE SS-122, an individual;
JANE SP-123, an individual;
JANE TM-124, an individual;
JANE SS-125, an individual;
JANE LB-126, an individual;
JANE BB-127, an individual;
JANE VC-128, an individual;
JANE CC-129, an individual;

1 JANE DH-130, an individual;
2 JANE LJ-131, an individual;
3 JANE AC-132, an individual;
4 JANE JW-133, an individual;
5 JANE SP-134, an individual;
6 JANE SM-135, an individual;
7 JANE KG-136, an individual;
8 JANE AB-137, an individual;
9 JANE VD-138, an individual;
10 JANE SM-139, an individual;
11 JANE SD-140, an individual;
12 JANE RH-141, an individual;
13 JANE ML-142, an individual;
14 JANE LF-143, an individual; and
15 JANE AG-144, an individual;

16 Plaintiffs,

17 vs.

18 STATE OF CALIFORNIA; CALIFORNIA
19 DEPARTMENT OF CORRECTIONS AND
20 REHABILITATION, a governmental entity;
21 GABRIEL AYALA, an individual; STEVE
22 ALARCON, an individual; FERNANDO
23 ARROYO, an individual; MICHAEL BARON,
24 an individual; ANTHONY BRANCO, an
25 individual; FRANK BATTLE, an individual;
26 DUSTIN BROWN, an individual; SEAN
27 BROWN, an individual; FRANK CHAVEZ, an
28 individual; ROBERT JASON DARROW, an
individual; DERRICK DAVIS, an individual;
ROBERT DELGADO, an individual;
FRANCISCO GARCIA, an individual;
FERNANDO GARCIA JR., an individual;
SEAN GUYSON, an individual; ROBERT
HERMOSILLO, an individual; KARL JONES,
an individual; MARK MEDINA, an individual;
RUBEN MENDOZA, an individual; SANTINO
MORALES, an individual; JEFFREY
MULLEN, an individual; FERNANDO
NARANJO, an individual; JAIME PADILLA,
an individual; TOMMY REYES, an individual;
GREGORY RODRIGUEZ, an individual;
SERGIO RIOS, an individual; STEVEN
REYNOLDS, an individual; COREY
SANCHEZ, an individual; ED SCHMITZ, an
individual; JOEY SOLORIO, an individual;

1 SEAN SOSA, an individual; FRANCISCO
2 TAPIA, an individual; ALEJANDRO TRACY,
3 an individual; ISRAEL TREVINO, an
4 individual GARY TURNER R. JR., an
5 individual; CAPTAIN KORAODUS TURNER,
6 an individual; JAMES WHITE, an individual;
7 and DOES 1-500,

8
9 Defendants.

10 Comes now Plaintiffs, JANE CL-1 ROE, an individual; JANE LC-2 ROE, an individual;
11 JANE CB-3 ROE, an individual; JANE AN-4 ROE, an individual; JANE SM-5 ROE, an
12 individual; JANE SH-6 ROE, an individual; JANE JH-7 ROE, an individual; JANE MS-8 ROE,
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4 individual; JANE RH-141, an individual; JANE ML-142, an individual; JANE LF-143, an
5 individual; JANE AG-144, an individual; et al. (“PLAINTIFFS”), and allege:

6 **GENERAL ALLEGATIONS AS TO THE PARTIES**

7 1. This collection of sex abuse survivors, prison inmates in the California Department
8 of Corrections at the time of the abuse, stems from an egregious failure to safeguard detainees who
9 are already deprived of their liberties and freedom that is a heinous misuse of power. The atrocious
10 violation of human rights and outrageous betrayal of the trust not only cause great physical and
11 mental harm to the victims, but also jeopardizes the whole foundation of the criminal justice
12 system, which is supposed to promote safety and rehabilitation. These sexual assaults show a
13 blatant disrespect for the dignity and well-being of those who are already disadvantaged in society.
14 To protect the environment, it is critical that these heinous activities are uncovered, denounced,
15 and dealt with prompt and harsh repercussions.

16 2. Unfortunately, the complaints of sex abuse victims within correctional facilities
17 frequently go unheard, leading to a vicious cycle of silence and additional victimization. The
18 voices of these survivors are marginalized and ignored as a result of structural flaws in the prison
19 system, such as a lack of accountability, a culture of secrecy, and a power dynamic that
20 overwhelmingly favors the guards.

21 3. These victims frequently experience intimidation and threats from the people in
22 charge of their care, which makes it extremely challenging for them to come forward or pursue
23 justice. In addition, the stigma that surrounds those who are jailed further marginalizes their
24 experiences, resulting in doubt and disregard from authorities and the broader public. The fact that
25 these victims, who have already lost their freedom, are being denied justice is a tragic truth.

26 4. This egregious conduct in violation of PLAINTIFFS’ civil liberties, constitutional
27 rights as well as *Penal Code* §§ 243.4(a) and 289.6 makes it a crime to engage in sexual misconduct
28 with an inmate, occurred under color of authority by actors, employees and/or agents of the State

1 of California (hereinafter referred to as “CALIFORNIA” inclusive of DOES 1-500) and California
2 Department of Corrections and Rehabilitation (hereinafter referred to as “CDCR” inclusive of
3 DOES 1-500) while they were detained and housed at various facilities owned and/or run by
4 Defendant CALIFORNIA. (The term “DEFENDANTS” shall reference all Defendants, including,
5 CALIFORNIA and CDCR, its agents and or employees and DOES 1-500 inclusive.)

6 5. DEFENDANTS under color of authority repeatedly sexually abuse inmates in their
7 custody, care, control, and direction by allowing DEFENDANTS to engage in a variety of sexual
8 acts, such as skin-to-skin groping, oral and manual copulation, digital penetration, and even anal
9 penetration, on prisoners. PLAINTIFFS were threatened with bodily violence or the loss of more
10 rights and privileges if they disobeyed DEFENDANTS’ demands, and their privileges were
11 revoked as a punishment.

12 6. At the expense of the vulnerable prisoners, these atrocities were done to satiate
13 DEFENDANTS’ own control, power, and sexual demands. During PLAINTIFFS’ incarceration
14 at the Facilities, DEFENDANTS were aware of all the incidents or should have been. But rather
15 than taking the necessary corrective and preventive measures, DEFENDANTS ratified and
16 endorsed the behavior through their undeniably actions and/or omissions, which sent a signal to
17 PLAINTIFFS that such abuse and harassment is acceptable.

18 **PARTIES**

19 7. PLAINTIFFS were at all times relevant herein residents of the State of California.
20 Due to PLAINTIFFS being victims of sexual abuse and harassment, their identities have been
21 protected in this public filing due to the sensitive and persona nature of the allegations under *Penal*
22 *Code* § 293.

23 8. Defendant CALIFORNIA is, and at all times relevant herein, is a governmental
24 entity within presence in all jurisdictions in the State of California.

25 9. Defendant CDCR is the state of California’s criminal law enforcement organization
26 in charge of managing the parole and state prison systems in CALIFORNIA with its principal
27 office in Sacramento, CA. The following women prisons are managed and control through the
28 CDCR by CALIFORNIA:

1 a. California Institution for Women (“CIW”) is a women’s state prison located in the
2 city of Chino, San Bernardino County, California. It is a female prison facility that
3 houses women convicted of major and violent offenses. Despite its objective to
4 create a safe and secure environment for inmates, CIW has been plagued with
5 sexual abuse. According to reports from former inmates and advocacy groups,
6 sexual abuse is a widespread issue at the facility, with many inmates facing
7 unwelcome sexual advances, physical assault, and rape as a result of power
8 dynamics within the jail, which makes it easier for them to pressure or intimidate
9 women into engaging in sexual activities, leaving them more vulnerable to sexual
10 exploitation. In a 2016 report by the Office of the Inspector General, investigators
11 found that CIW had failed to properly investigate allegations of sexual abuse and
12 harassment, and that staff members who engaged in abusive behavior were not held
13 accountable. The report also noted that female inmates at CIW faced a “pervasive
14 culture of staff sexual misconduct.” Following, in a 2018 investigation by the Los
15 Angeles Times, former CIW inmates and staff members described a pattern of
16 sexual abuse, sexual advances, physical assault, and rape by staff members, often
17 with little recourse for reporting abuse.

18 b. Central California Women’s Facility (“CCWF”) is a female-only California
19 Department of Corrections and Rehabilitation state prison located in Chowchilla,
20 California located across the road from Valley State Prison. CCWF is the second
21 largest female correctional facility in the United States and houses the only State of
22 California death row for women with numerous reports of historical sexual abuse.
23 In 2013, a federal court ordered the state of California to provide mental health care
24 to female inmates who had been sexually abused by staff members at CCWF,
25 following a lawsuit filed by several victims. Following, in a 2014 investigation by
26 the Fresno Bee, former CCWF inmates and staff members described a culture of
27 sexual abuse and harassment at the prison. Inmates reported being subjected to
28 sexual assault and rape by staff members, with little recourse for reporting abuse.

1 Staff members who engaged in abusive behavior were often protected by their
2 colleagues and supervisors, making it difficult for victims to come forward.

3 10. DEFENDANTS GABRIEL AYALA, an individual; STEVE ALARCON, an
4 individual; FERNANDO ARROYO, an individual; MICHAEL BARON, an individual;
5 ANTHONY BRANCO, an individual; FRANK BATTLE, an individual; DUSTIN BROWN, an
6 individual; SEAN BROWN, an individual; FRANK CHAVEZ, an individual; ROBERT JASON
7 DARROW, an individual; DERRICK DAVIS, an individual; ROBERT DELGADO, an
8 individual; FRANCISCO GARCIA, an individual; FERNANDO GARCIA JR., an individual;
9 SEAN GUYSON, an individual; ROBERT HERMOSILLO, an individual; KARL JONES, an
10 individual; MARK MEDINA, an individual; RUBEN MENDOZA, an individual; SANTINO
11 MORALES, an individual; JEFFREY MULLEN, an individual; FERNANDO NARANJO, an
12 individual; JAIME PADILLA, an individual; TOMMY REYES, an individual; GREGORY
13 RODRIGUEZ, an individual; SERGIO RIOS, an individual; STEVEN REYNOLDS, an
14 individual; COREY SANCHEZ, an individual; ED SCHMITZ, an individual; JOEY SOLORIO,
15 an individual; SEAN SOSA, an individual; FRANCISCO TAPIA, an individual; ALEJANDRO
16 TRACY, an individual; ISRAEL TREVINO, an individual GARY TURNER R. JR., an individual;
17 CAPTAIN KORAODUS TURNER, an individual; JAMES WHITE, an individual; and DOES 1-
18 500 are, and at all times relevant herein, were individuals resides in the State of California and
19 acting under color of authority and in the course and scope of their employment with Defendant
20 CALIFORNIA at the time of the sexual misconduct.

21 11. The sexual acts alleged by PLAINTIFFS took place within the State of California
22 by named officers identified as being involved in the conduct and unknown agents, employees
23 and/or servants of CALIFORNIA sued as DOES 1-500 employed by the CALIFORNIA, who were
24 acting within the course and scope of their employment and/or agency with CALIFORNIA at all
25 times referenced herein, and were the individuals who committed the subject acts to PLAINTIFFS
26 and/or was under their complete control and/or active supervision.

27 12. PLAINTIFFS are informed and believe, and on that basis allege, that all
28 DEFENDANTS, including the fictitious Doe Defendants, were at all relevant times acting as actual

1 agents, captive agents or brokers, conspirators, ostensible agents, partners, brokers and/or joint
2 ventures, co-tortfeasors and employees of all other defendants, and that all acts alleged occurred
3 within the course and scope of the agency, employment, partnership, joint venture, conspiracy
4 and/or enterprise, and with the express and/or implied permission, knowledge, consent,
5 authorization and ratification of their co-defendants; however, this allegation is pleaded as an
6 “alternative” theory wherever not doing so would result in a contradiction with other allegations.

7 13. The true names of DOES 1-500 are readily unavailable and unknown to
8 PLAINTIFFS, who therefore sue the Doe Defendants by fictitious names. PLAINTIFFS allege
9 that DEFENDANTS and DOES 1-500, were employees and/or agents of CALIFORNIA during
10 the incidents referenced and were responsible in some way for PLAINTIFFS’ injuries.
11 PLAINTIFFS will amend this Complaint to show their true names and capacities when they have
12 been ascertained.

13 14. Regarding each constitutional violation and tort referenced, PLAINTIFFS allege
14 that DEFENDANTS are vicariously liable for the actions of its individual employees, which
15 actions were within the scope of employment, because imposition of vicarious liability (1) will
16 prevent the recurrence of similar tortious conduct by creating an incentive for vigilance by those
17 in a position to guard against the evil to be prevented; (2) would give greater assurance of
18 compensation to the victim; and (3) would spread the loss among the beneficiaries of the enterprise
19 because of the substantial benefits to the community stemming from lawfully exercising police
20 power.

21 15. All allegations in this Complaint are based on information and belief and/or are
22 likely to have evidentiary support after a reasonable opportunity for further investigation or
23 discovery. Pursuant to *Code of Civil Procedure* 340.16, and in certain instances *Code of Civil*
24 *Procedure* 340.1, PLAINTIFFS bring this Complaint against DEFENDANTS to recover damages
25 suffered by PLAINTIFFS as a result of sexual abuse and other relief available at law and in equity.

26 16. Whenever allegations in this complaint are contrary or inconsistent, such
27 allegations shall be deemed alternative.
28

1 **JURISDICTION AND VENUE**

2 17. The amount in controversy, exclusive of interest and costs, exceeds the
3 jurisdictional minimum of this Court. Accordingly, this Court has jurisdiction over the case at bar.
4 Venue is proper because DEFENDANTS conduct business in the State of California. The
5 coordination under JCCP No. 5276 is merited pursuant to *California Code of Civil Procedure* §
6 404.1, as this action is deemed complex and involves a shared question of fact and law with cases
7 that are pending in other counties and have already been coordinated.

8 **FACTUAL ALLEGATIONS APPLICABLE TO ALL CLAIMS BY PLAINTIFFS**

9 18. At all times material hereto, PLAINTIFFS were in the direct custody, care,
10 supervision, and control of DEFENDANTS, inclusive, due to their physical confinement at the
11 facilities.

12 19. PLAINTIFFS' confinement was court-ordered, mandatory, and the duration and
13 nature of their commitment depended on their compliance to the orders, judgments, demands,
14 and directives of DEFENDANTS, and each of them.

15 20. At all times herein referenced, Defendant DOES 1-500 were in a position of
16 authority, trust, influence, and persuasion over PLAINTIFFS. DOES 1-500 were agents and/or
17 employees of CALIFORNIA, who maintained a special relationship with them to assure them
18 reasonable health, safety, and freedom from undue restraint and abuse. Defendant DOES 1-500
19 abuse of PLAINTIFFS was under color of authority. Defendant CALIFORNIA is liable for the
20 acts, omissions and conduct of its employees pursuant to *California Government Code* §815.2.

21 21. PLAINTIFFS are informed and believe, and on this basis allege, that at all times
22 material hereto, CALIFORNIA hired, trained, and supervised DOES 1-500, to serve as Officers
23 and employees of CALIFORNIA, responsible for the custody, supervision, care, control, direction,
24 safety, and wellbeing of female inmates in these facilities.

25 22. PLAINTIFFS contend that CALIFORNIA failed in all aspects of their duties,
26 including the hiring, retention, training, and supervision of DOES 1-500, including, but not limited
27 to:
28

- a. lack of adequate hiring policies and procedures to prevent sexual predators from having exclusive exercise and control over inmates to sexual abuse them under color of authority while in detention;
- b. unrestricted and unsupervised intimate access to inmates for sexual touching and gratification by DOES 1-500 in violation of *Penal Code* §§ 243.4(a) and 289.6;
- c. Inadequate and/or improper training of DEFENDANT DOES 1-500 to provide safety and security for inmates while in custody against sexual abuse;
- d. Ratification and authorization of the improper sexual misconduct as observed by other DEFENDANTS' employees who allowed the abuse to continue due to blind ignorance, willful ignorance, lack of property supervision and/or improper and avoided training.

23. DEFENDANTS, and each of them, failed to provide supervision to keep inmate reasonably safe from harm and allowed DOES 1-500, who used their position of authority and trust to sexually abuse, molest, and harass, PLAINTIFFS herein.

24. Such sexual conduct was done for DOES 1-500's own sexual gratification and perversion, and performed on and with PLAINTIFFS without their consent, as PLAINTIFFS were unable to give legal consent to such predatory sexual acts given their confinement.

25. PLAINTIFFS are informed and believe, and on that basis allege, that DEFENDANTS, its employees and/or agents knew or should have known that DOES 1-500 had engaged in unlawful sexually abusive and harassing conduct in the past, and/or was continuing to engage in such conduct. DEFENDANTS had a duty to disclose these facts to PLAINTIFFS and others, but negligently and/or intentionally suppressed, concealed, or failed to disclose this information. The duty to disclose this information arose from the special, trusting, confidential, fiduciary relationship between DEFENDANTS and PLAINTIFFS.

26. Based upon information and belief, and alleges thereon, PLAINTIFFS contend there was no formal or informal grievance process relating to the conditions of confinement in which they could make complaints about the sexual abuse and harassment by DOES 1-500. Moreover, to the extent there was a process, PLAINTIFFS at all times were unaware of the process

1 and DEFENDANTS have failed to advise PLAINTIFFS of their rights to complain about the
2 sexual misconduct without fear and/or threat of retaliation or other form of deterrence. Further, to
3 the extent there was a process, PLAINTIFFS at all times were coerced and threatened not to report
4 the sexual abuse through physical and verbal acts of intimidation, actual and/or constructive
5 retaliation and/or other form of deterrence. In addition, when certain PLAINTIFFS made
6 complaints of violence and sexual assault, any formal policy and procedure for grievances fell on
7 deaf ears without recourse, formal hearings, resolution efforts, and/or any other manner of redress.
8 If a formal grievance process had to be commenced under the circumstance, the grievance process
9 at the facilities was “effectively unavailable.” Finally, PLAINTIFFS allege that each of them are
10 no longer in custody and therefore any potential grievance process need not be exhausted prior to
11 making this claim.

12 27. PLAINTIFFS further contend that each of them were targeted after being isolated
13 and control by means of the special relationship between guards and inmates established through
14 detention itself. DOES 1-500, through grooming and isolated confinement, exploited their position
15 of trust and authority resulting in the sexual abuse in violation of *Penal Code* § 243.4(a) and 289.6.

16 28. PLAINTIFFS allege that DEFENDANTS and DOES 1-500 escaped liability and
17 discipline for years based upon DEFENDANTS failure to properly and efficiently investigate the
18 allegations of sexual abuse. Moreover, DEFENDANTS were not disciplined, including
19 termination, due to investigators violating the statute of limitations for investigators of peach
20 officers not taking more than a year to complete their report.

21 **CALIFORNIA AND CDCR VICAROUS LIABILITY FOR ACTS OF OFFICERS**

22 29. PLAINTIFFS contend that at all times herein described, DOES 1-500 who
23 committed the sexual acts and/or who allowed the sexual acts to occur by actions or omissions to
24 act (hereafter, “THE ABUSERS”) as agents, employees, and/or servants of DEFENDANTS acted
25 under color of authority when the sexual abuse and misconduct took place. Under the doctrine of
26 respondeat superior, DEFENDANTS are vicariously liable for torts committed by THE
27 ABUSERS within the scope of their employment. [Under *Govt.C.* 815.2, the respondeat superior
28 doctrine applies to public and private employers in private tort litigation].

1 30. DEFENDANTS are liable for all acts and/or omissions to act by THE ABUSERS
2 in their course and scope of employment given THE ABUSERS, as on-duty officers and/or
3 employees committed these acts and misused their authority by sexually abusing PLAINTIFFS
4 whom they had detained in DEFENDANTS’ facilities. See generally *Mary M. v. City of Los*
5 *Angeles*, (1991) 54 Cal. 3d 202.

6 **SPECIFIC FACTUAL ALLEGATIONS FOR EACH PLAINTIFF**

7 a. **JANE CL-1 ROE:**

- 8 i. Plaintiff JANE CL-1 ROE is a female, born on 4/18/1982, who was sexually
9 abused in 2015 when the conduct alleged herein occurred at CIW.
- 10 ii. Plaintiff JANE CL-1 ROE was committed to physical mandatory
11 confinement at CIW where she encountered DOES Sergeant Ramirez who
12 had unfettered access and control, and used a position of power, trust, and
13 authority to sexually abuse and harass Plaintiff JANE CL-1 ROE under
14 color of authority on behalf of Defendants CALIFORNIA and CDCR, and
15 each of them.
- 16 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
17 means that would justify the sexual misconduct, DOES Sergeant Ramirez
18 isolated Plaintiff JANE CL-1 ROE and then, with his penis, violently raped
19 Plaintiff JANE CL-1 ROE in her anus to the point of bleeding from Plaintiff
20 JANE CL-1 ROE’S anus. DOES Sergeant Ramirez also forced his penis in
21 Plaintiff JANE CL-1 ROE’S mouth. There were over 40 instances of sexual
22 misconduct inflicted by DOES Sergeant Ramirez at CIW on Plaintiff JANE
23 CL-1 ROE.
- 24 iv. Out of fear of retaliation and further confinement, Plaintiff JANE CL-1
25 ROE never reported the sexual misconduct assuming the complaints would
26 be unanswered, dismissed, ignored, and bury without investigation or
27 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
28 CL-1 ROE was systematically and consistently sexually abused in the “safe

1 haven” environment created and controlled by Defendants CALIFORNIA
2 and CDCR, THE ABUSERS, DOES, and each of them.

- 3 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE CL-
4 1 ROE has experienced ongoing and persistent mental, emotional and
5 psychological problems, including, but not limited to: anxiety; depression;
6 feelings of helplessness; insomnia, questioning of sexual identity; lowered
7 self-esteem; moodiness; difficulty in meaningfully interacting with others
8 and intimate relationships; loss of trust and control issues with any persons
9 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
10 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
11 among others.

12 b. **JANE LC-2 ROE:**

- 13 i. Plaintiff JANE LC-2 ROE is a female, born on 10/14/1996, who was
14 sexually abused in 2019 when the conduct alleged herein occurred at CIW.
- 15 ii. Plaintiff JANE LC-2 ROE was assaulted on several occasions while she was
16 committed to physical mandatory confinement at CIW during which DOES,
17 a male correctional officer at CIW, either DOES Correctional Officer
18 Alvarez or Correctional Officer Alejandro Tracy, used his unfettered access
19 and control, and used a position of power, trust, and authority to sexually
20 abuse and harass Plaintiff JANE LC-2 ROE under color of authority on
21 behalf of Defendants CALIFORNIA and CDCR, and each of them.
- 22 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
23 means that would justify the sexual misconduct, DOES isolated Plaintiff
24 JANE LC-2 ROE in restrooms where she was asked by DOES to clean the
25 restroom. Thereafter, in the restrooms, DOES made sexually driven
26 comments to Plaintiff JANE LC-2 ROE before DOES forced Plaintiff
27 JANE LC-2 ROE’S pants down and then touched and digitally penetrated
28 Plaintiff JANE LC-2 ROE’s vagina, and forced Plaintiff JANE LC-2 ROE

1 to touch DOES' penis and perform oral copulation on DOES. DOES
2 threatened Plaintiff JANE LC-2 ROE by stating that if Plaintiff JANE LC-
3 2 ROE did not engage in the demanded sexual acts with DOES, DOES
4 would throw Plaintiff JANE LC-2 ROE in solitary confinement for illegal
5 drugs. Plaintiff JANE LC-2 ROE threatened to report the misconduct, but
6 DOES retaliated by reporting Plaintiff JANE LC-2 ROE for taking food
7 from the kitchen, which resulted in Plaintiff JANE LC-2 ROE being strip
8 searched by DOES and thrown in the "cage."

9 iv. Plaintiff JANE LC-2 ROE was systematically and consistently sexually
10 abused in the "safe haven" environment created and controlled by
11 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
12 of them.

13 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE LC-
14 2 ROE has experienced ongoing and persistent mental, emotional and
15 psychological problems, including, but not limited to: anxiety; depression;
16 feelings of helplessness; insomnia, questioning of sexual identity; lowered
17 self-esteem; moodiness; difficulty in meaningfully interacting with others
18 and intimate relationships; loss of trust and control issues with any persons
19 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
20 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
21 among others.

22 c. **JANE CB-3 ROE:**

23 i. Plaintiff JANE CB-3 ROE is a female, born on 5/30/1993, who was sexually
24 abused in 2020 when the conduct alleged herein occurred at CIW.

25 ii. Plaintiff JANE CB-3 ROE was committed to physical mandatory
26 confinement at CIW where she encountered DOES Correctional Officer
27 Gaytan who had unfettered access and control, and used a position of power,
28 trust, and authority to sexually abuse and harass Plaintiff JANE CB-3 ROE

1 under color of authority on behalf of Defendants CALIFORNIA and
2 CDCR, and each of them.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, DOES Correctional Officer
5 Gaytan isolated Plaintiff JANE CB-3 ROE approximately five (5) times in
6 a chemical supply room where Plaintiff JANE CB-3 ROE was on cleaning
7 duty. During these instances, DOES Correctional Officer Gaytan pushed
8 Plaintiff JANE CB-3 ROE into the room and closed the door. Next DOES
9 Correctional Officer Gaytan groped Plaintiff JANE CB-3 ROE'S vagina
10 and attempted to rape Plaintiff JANE CB-3 ROE after rubbing his exposed
11 penis on Plaintiff JANE CB-3 ROE'S bare vagina.

12 iv. Out of fear of retaliation and further confinement, Plaintiff JANE CB-3
13 ROE only reported the sexual misconduct to another correctional officer
14 who disregarded Plaintiff JANE CB-3 ROE. Plaintiff JANE CB-3 ROE did
15 not report to anyone thereafter, as she assumed the complaints would
16 continue to be unanswered, dismissed, ignored, and bury without
17 investigation or redress thereby allowing the sexual misconduct to continue.
18 Plaintiff JANE CB-3 ROE was systematically and consistently sexually
19 abused in the "safe haven" environment created and controlled by
20 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
21 of them.

22 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE CB-
23 3 ROE has experienced ongoing and persistent mental, emotional and
24 psychological problems, including, but not limited to: anxiety; depression;
25 feelings of helplessness; insomnia, questioning of sexual identity; lowered
26 self-esteem; moodiness; difficulty in meaningfully interacting with others
27 and intimate relationships; loss of trust and control issues with any persons
28 in a position of authority and trust; flashbacks and intrusive thoughts; stress;

1 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
2 among others.

3 d. **JANE AN-4 ROE:**

4 i. Plaintiff JANE AN-4 ROE is a female, born on 3/12/1985, who was
5 sexually abused in 2015 when the sexual misconduct alleged herein
6 occurred at CIW.

7 ii. Plaintiff JANE AN-4 ROE was committed to physical mandatory
8 confinement at CIW where she encountered Defendant Correctional Officer
9 Robert Jason Darrow and DOES Correctional Officer Miranda who had
10 unfettered access and control, and used a position of power, trust, and
11 authority to sexually abuse and harass Plaintiff JANE AN-4 ROE under
12 color of authority on behalf of Defendants CALIFORNIA and CDCR, and
13 each of them.

14 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
15 means that would justify the sexual misconduct, Defendant Darrow entered
16 Plaintiff JANE AN-4 ROE'S cell and closed the door behind him. Then,
17 Correctional Officer Darrow started groping Plaintiff JANE AN-4 ROE'S
18 bare breasts with his bare hands. During another incident, while Plaintiff
19 JANE AN-4 ROE was in the cleaning closet, DOES Correctional Officer
20 Miranda put his bare hand under Plaintiff JANE AN-4 ROE'S pants and
21 groped her bare buttocks. During a third incident, DOES Correctional
22 Officer Miranda entered Plaintiff JANE AN-4 ROE'S cell and began
23 sucking Plaintiff JANE AN-4 ROE'S neck during count time in the
24 morning. During a fourth incident, Defendant Correctional Officer Darrow
25 entered Plaintiff JANE AN-4 ROE'S cell and put his bare hand on Plaintiff
26 JANE AN-4 ROE'S bare vagina, digitally penetrating Plaintiff JANE AN-
27 4 ROE'S vagina for approxiamtely five (5) minutes.

1 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AN-4
2 ROE never reported the sexual misconduct assuming the complaints would
3 be unanswered, dismissed, ignored, and bury without investigation or
4 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
5 AN-4 ROE was systematically and consistently sexually abused in the “safe
6 haven” environment created and controlled by Defendants CALIFORNIA
7 and CDCR, THE ABUSERS, DOES, and each of them.

8 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AN-
9 4 ROE has experienced ongoing and persistent mental, emotional and
10 psychological problems, including, but not limited to: anxiety; depression;
11 feelings of helplessness; insomnia, questioning of sexual identity; lowered
12 self-esteem; moodiness; difficulty in meaningfully interacting with others
13 and intimate relationships; loss of trust and control issues with any persons
14 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
15 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
16 among others.

17 e. **JANE SM-5 ROE:**

18 i. Plaintiff JANE SM-5 ROE is a female, born on 3/8/1987, who was sexually
19 abused in 2014 when the sexual misconduct alleged herein occurred at
20 CCWF.

21 ii. Plaintiff JANE SM-5 ROE was committed to physical mandatory
22 confinement at CCWF where she encountered Defendant Correctional
23 Officer Gregory Rodriguez who had unfettered access and control, and used
24 a position of power, trust, and authority to sexually abuse and harass
25 Plaintiff JANE SM-5 ROE under color of authority on behalf of Defendants
26 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

27 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
28 means that would justify the sexual misconduct, Defendant Correctional

1 Officer Gregory Rodriguez isolated Plaintiff JANE SM-5 ROE in her cell
2 and forced Plaintiff JANE SM-5 ROE to perform oral sexual acts on
3 Defendant Correctional Officer Gregory Rodriguez. At the time of the
4 misconduct, Plaintiff JANE SM-5 ROE was pregnant.

5 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SM-5
6 never reported the sexual misconduct assuming the complaints would be
7 unanswered, dismissed, ignored, and bury without investigation or redress
8 thereby allowing the sexual misconduct to continue. Plaintiff JANE SM-5
9 ROE was systematically and consistently sexually abused in the “safe
10 haven” environment created and controlled by Defendants CALIFORNIA
11 and CDCR, THE ABUSERS, DOES, and each of them.

12 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SM-
13 5 ROE has experienced ongoing and persistent mental, emotional and
14 psychological problems, including, but not limited to: anxiety; depression;
15 feelings of helplessness; insomnia, questioning of sexual identity; lowered
16 self-esteem; moodiness; difficulty in meaningfully interacting with others
17 and intimate relationships; loss of trust and control issues with any persons
18 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
19 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
20 among others.

21 f. **JANE SH-6 ROE:**

22 i. Plaintiff JANE SH-6 ROE is a female, born on 10/14/1980, who was
23 sexually abused in or around 2017 when the sexual misconduct alleged
24 herein occurred at CCWF.

25 ii. Plaintiff JANE SH-6 ROE was committed to physical mandatory
26 confinement at CCWF where she encountered DOES Correctional Officer
27 Block who had unfettered access and control, and used a position of power,
28 trust, and authority to sexually abuse and harass Plaintiff JANE SH-6 ROE

1 under color of authority on behalf of Defendants CALIFORNIA and
2 CDCR, THE ABUSERS, DOES, and each of them.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, DOES Correctional Officer
5 Block, during the time he was having intercourse with Plaintiff JANE SH-
6 ROE'S cellmate, made "jokes" about wanting to see other inmates'
7 breasts as he escorted these women to and from the showers. DOES
8 Correctional Block would also grope these inmates' breasts and buttocks,
9 including Plaintiff JANE SH-6 ROE'S, while escorting them to and from
10 the showers, and he groped JANE SH-6 ROE'S buttocks. DOES
11 Correctional Block also groped Plaintiff JANE SH-6 ROE'S vagina with
12 his bare hands.

13 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SH-6
14 ROE never reported the sexual misconduct assuming the complaints would
15 be unanswered, dismissed, ignored, and bury without investigation or
16 redress thereby allowing the sexual misconduct to continue. Plaintiff was
17 systematically and consistently sexually abused in the "safe haven"
18 environment created and controlled by Defendants CALIFORNIA and
19 CDCR, THE ABUSERS, DOES, and each of them.

20 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SH-
21 6 ROE has experienced ongoing and persistent mental, emotional and
22 psychological problems, including, but not limited to: anxiety; depression;
23 feelings of helplessness; insomnia, questioning of sexual identity; lowered
24 self-esteem; moodiness; difficulty in meaningfully interacting with others
25 and intimate relationships particularly with men; loss of trust and control
26 issues with any persons in a position of authority and trust; flashbacks and
27 intrusive thoughts; stress; nervousness; fear; embarrassment; shame; and
28 loss of enjoyment of life, among others.

1 g. **JANE JH-7 ROE:**

2 i. Plaintiff JANE JH-7 ROE is a female, born on 10/18/1984, who was
3 sexually abused in or around 2017 when the sexual misconduct alleged
4 herein occurred at CCWF.

5 ii. Plaintiff JANE JH-7 ROE was committed to physical mandatory
6 confinement at CCWF where she encountered Defendant Correctional
7 Officer Israel Trevino who had unfettered access and control, and used a
8 position of power, trust, and authority to sexually abuse and harass JANE
9 SH-7 ROE under color of authority on behalf of Defendants CALIFORNIA
10 and CDCR, THE ABUSERS, DOES, and each of them.

11 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
12 means that would justify the sexual misconduct, Defendant Correctional
13 Officer Trevino approached Plaintiff JANE JH-7 ROE while in the janitor's
14 closet, closed the door, and groped Plaintiff JANE JH-7 ROE's bare breast.
15 On another occasion, Defendant Correctional Officer Trevino grabbed
16 Plaintiff JANE JH-7 ROE'S hair to keep her from moving and fondled
17 Plaintiff JANE JH-7 ROE's vagina.

18 iv. Out of fear of retaliation and further confinement, particularly given the fact
19 that Defendant Correctional Officer Trevino threatened Plaintiff JANE JH-
20 7 ROE and said he would get away with the sexual misconduct because he
21 was a correctional officer and Plaintiff JANE JH-7 ROE was a criminal,
22 Plaintiff JANE JH-7 ROE never reported the sexual misconduct assuming
23 the complaints would be unanswered, dismissed, ignored, and bury without
24 investigation or redress thereby allowing the sexual misconduct to continue.
25 Plaintiff JANE JH-7 ROE was systematically and consistently sexually
26 abused in the "safe haven" environment created and controlled by
27 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
28 of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE JH-7
2 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; difficulty in meaningfully interacting with others
6 and intimate relationships; loss of trust and control issues with any persons
7 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
8 nervousness; fear that every male after her sexual assault wanted to touch
9 her Inappropriately; embarrassment; shame; and loss of enjoyment of life,
10 among others.

11 h. **JANE MS-8 ROE:**

- 12 i. Plaintiff JANE MS-8 ROE is a female, born on 5/6/1989, who was sexually
13 abused in or around 2014 and 2021 when the sexual misconduct alleged
14 herein occurred at CCWF.
- 15 ii. Plaintiff JANE MS-8 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered DOES Sergeant Armandi
17 and DOES Correctional Officer Trevino who had unfettered access and
18 control, and used a position of power, trust, and authority to sexually abuse
19 and harass Plaintiff JANE MS-8 ROE under color of authority on behalf of
20 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
21 of them.
- 22 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
23 means that would justify the sexual misconduct, DOES Sergeant Armandi
24 isolated Plaintiff JANE MS-8 ROE and asked Plaintiff JANE MS-8 ROE to
25 show him Plaintiff JANE MS-8 ROE'S breasts. DOES Sergeant Armandi
26 then touched Plaintiff JANE MS-8 ROE'S bare breasts and groped JANE
27 MS-8 ROE'S vagina. Additionally, DOES Correctional Officer Trevino
28 forced JANE MS-8 ROE to go to the restroom and her cell multiple times

1 where DOES Correctional Officer Trevino touched JANE MS-8 ROE'S
2 bare breasts and vagina. Lastly, DOES Correctional Officer Perales groped
3 and digitally penetrated JANE MS-8 ROE'S bare vagina.

4 iv. Out of fear of retaliation and further confinement, Plaintiff JANE MS-8
5 ROE never reported the sexual misconduct assuming the complaints would
6 be unanswered, dismissed, ignored, and bury without investigation or
7 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
8 DL-2 ROE was systematically and consistently sexually abused in the "safe
9 haven" environment created and controlled by Defendants CALIFORNIA
10 and CDCR, THE ABUSERS, DOES, and each of them.

11 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE MS-
12 8 ROE has experienced ongoing and persistent mental, emotional and
13 psychological problems, including, but not limited to: anxiety; depression;
14 feelings of helplessness; insomnia, questioning of sexual identity; lowered
15 self-esteem; moodiness; difficulty in meaningfully interacting with others
16 and intimate relationships; loss of trust and control issues with any persons
17 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
18 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
19 among others.

20 i. **JANE AJ-9 ROE:**

21 i. Plaintiff JANE AJ-9 ROE is a female, born on 8/23/1978, who was sexually
22 abused in or around 2014 when the sexual misconduct alleged herein
23 occurred at CCWF.

24 ii. Plaintiff JANE AJ-9 ROE was committed to physical mandatory
25 confinement at CCWF where she encountered Defendant Correctional
26 Officer Gary Turner R. Jr. who had unfettered access and control, and used
27 a position of power, trust, and authority to sexually abuse and harass
28

1 Plaintiff JANE AJ-9 ROE under color of authority on behalf of Defendants
2 CALIFORNIA and CDCR.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, Defendant Correctional
5 Officer Gary Turner R. Jr. took Plaintiff JANE AJ-9 ROE to a medical
6 center. While en route to the medical center, Correctional Officer Gary
7 Turner R. Jr. pulled down Plaintiff JANE AJ-9 ROE'S pants, and then used
8 his finger to digitally penetrate Plaintiff JANE AJ-9 ROE'S vagina.

9 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AJ-9 ROE
10 never reported the sexual misconduct assuming the complaints would be
11 unanswered, dismissed, ignored, and bury without investigation or redress
12 thereby allowing the sexual misconduct to continue. Plaintiff JANE AJ-9
13 ROE was systematically and consistently sexually abused in the "safe
14 haven" environment created and controlled by Defendants CALIFORNIA
15 and CDCR, THE ABUSERS, DOES, and each of them.

16 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AJ-9
17 ROE has experienced ongoing and persistent mental, emotional and
18 psychological problems, including, but not limited to: anxiety; depression;
19 feelings of helplessness; insomnia, questioning of sexual identity; lowered
20 self-esteem; moodiness; difficulty in meaningfully interacting with others
21 and intimate relationships; loss of trust and control issues with any persons
22 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
23 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
24 among others.

25 j. **JANE AH-10 ROE:**

26 i. Plaintiff JANE AH-10 ROE is a female, born on 7/26/1990, who was
27 sexually abused in or around 2020 when the sexual misconduct alleged
28 herein occurred at CIW.

- 1 ii. Plaintiff JANE AH-10 ROE was committed to physical mandatory
2 confinement at CIW where she encountered DOES Correctional Officer
3 Tracy who had unfettered access and control, and used a position of power,
4 trust, and authority to sexually abuse and harass Plaintiff JANE AH-10 ROE
5 under color of authority on behalf of Defendants CALIFORNIA and
6 CDCR, THE ABUSERS, DOES, and each of them.
- 7 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
8 means that would justify the sexual misconduct, DOES Correctional Officer
9 Tracy isolated Plaintiff JANE AH-10 ROE when he was supposed to be
10 locking Plaintiff JANE AH-10 ROE into her cell during quarantine time.
11 DOES Correctional Officer Tracy then digitally penetrated Plaintiff JANE
12 AH-10 ROE’S vagina. DOES Correctional Officer Tracy told Plaintiff
13 JANE AH-10 ROE that, if she made any noise, Plaintiff JANE AH-10 ROE
14 would spend the rest of her life in CIW.
- 15 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AH-10
16 ROE never reported the sexual misconduct assuming the complaints would
17 be unanswered, dismissed, ignored, and bury without investigation or
18 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
19 AH-10 ROE was systematically and consistently sexually abused in the
20 “safe haven” environment created and controlled by Defendants
21 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 22 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AH-
23 10 ROE has experienced ongoing and persistent mental, emotional and
24 psychological problems, including, but not limited to: anxiety; depression;
25 feelings of helplessness; insomnia, questioning of sexual identity; lowered
26 self-esteem; moodiness; difficulty in meaningfully interacting with others
27 and intimate relationships; loss of trust and control issues with any persons
28 in a position of authority and trust and, particularly, men; flashbacks and

1 intrusive thoughts; stress; nervousness; fear; embarrassment; shame; and
2 loss of enjoyment of life, among others.

3 k. **JANE FV-11 ROE:**

4 i. Plaintiff JANE FV-11 ROE is a female, born on 8/19/1991, who was
5 sexually abused in or around 2016 when the sexual misconduct alleged
6 herein occurred at CCWF.

7 ii. Plaintiff JANE FV-11 ROE was committed to physical mandatory
8 confinement at CCWF where she encountered DOES Correctional Officer
9 Serabia and Defendant Correctional Officer Gabriel Ayala who had
10 unfettered access and control, and used a position of power, trust, and
11 authority to sexually abuse and harass Plaintiff JANE FV-11 ROE under
12 color of authority on behalf of Defendants CALIFORNIA and CDCR, THE
13 ABUSERS, DOES, and each of them.

14 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
15 means that would justify the sexual misconduct, DOES Correctional Officer
16 Serabia pulled Plaintiff JANE FV-11 ROE into the supply closet during his
17 morning shift where he groped Plaintiff JANE FV-11 ROE'S bare breasts
18 and made Plaintiff JANE FV-11 ROE perform oral copulation on him.
19 Additionally, Defendant Correctional Officer Gabriel Ayala cornered
20 Plaintiff JANE FV-11 ROE on the yard in between two bushes where he
21 groped Plaintiff JANE FV-11 ROE'S breasts and buttocks.

22 iv. Out of fear of retaliation and further confinement, Plaintiff JANE FV-11
23 ROE never reported the sexual misconduct of Defendant Correctional
24 Officer Gabriel Ayala assuming the complaints would be unanswered,
25 dismissed, ignored, and bury without investigation or redress thereby
26 allowing the sexual misconduct to continue. Plaintiff JANE FV-11 ROE
27 was systematically and consistently sexually abused in the "safe haven"
28

1 environment created and controlled by Defendants CALIFORNIA and
2 CDCR, THE ABUSERS, DOES, and each of them.

- 3 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE FV-
4 11 ROE has experienced ongoing and persistent mental, emotional and
5 psychological problems, including, but not limited to: anxiety; depression;
6 feelings of helplessness; insomnia, questioning of sexual identity; lowered
7 self-esteem; moodiness; difficulty in meaningfully interacting with others
8 and intimate relationships; loss of trust and control issues with any persons
9 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
10 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
11 among others.

12 1. **JANE SR-12 ROE:**

- 13 i. Plaintiff JANE SR-12 ROE is a female, born on 4/23/1973, who was
14 sexually abused in or around 2014 when the sexual misconduct alleged
15 herein occurred at CCWF.
- 16 ii. Plaintiff JANE SR-12 ROE was committed to physical mandatory
17 confinement at CCWF where she encountered Defendant Correctional
18 Officer Gary Turner R. Jr. who had unfettered access and control, and used
19 a position of power, trust, and authority to sexually abuse and harass
20 Plaintiff JANE SR-12 ROE under color of authority on behalf of
21 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
22 of them.
- 23 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
24 means that would justify the sexual misconduct, Defendant Correctional
25 Officer Gary Turner R. Jr. isolated Plaintiff JANE SR-12 ROE on Plaintiff
26 JANE SR-12 ROE'S way back to her cell from kitchen duty. Defendant
27 Correctional Officer Gary Turner R. Jr. then told Plaintiff JANE SR-12
28 ROE to get a mop and broom to clean up a mess. Accordingly, Plaintiff

1 JANE SR-12 ROE went to the utilities closet when Defendant Correctional
2 Officer Gary Turner R. Jr. came up behind Plaintiff JANE SR-12 ROE and
3 closed the door. Defendant Correctional Officer Gary Turner R. Jr. next told
4 Plaintiff JANE SR-12 ROE to turn around and not make any noise or he
5 would write her up and keep her in jail longer before pushing Plaintiff JANE
6 SR-12 ROE down, opening up his pants, and then raping Plaintiff JANE
7 SR-12 ROE when he violently penetrated Plaintiff JANE SR-12 ROE'S
8 vagina with his penis.

9 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SR-12
10 ROE never reported the sexual misconduct assuming the complaints would
11 be unanswered, dismissed, ignored, and bury without investigation or
12 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
13 SR-12 ROE systematically and consistently sexually abused in the "safe
14 haven" environment created and controlled by Defendants CALIFORNIA
15 and CDCR, THE ABUSERS, DOES, and each of them.

16 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SR-
17 12 ROE has experienced ongoing and persistent mental, emotional and
18 psychological problems, including, but not limited to: anxiety; depression;
19 feelings of helplessness; insomnia, questioning of sexual identity; lowered
20 self-esteem; moodiness; difficulty in meaningfully interacting with others
21 and intimate relationships; loss of trust and control issues with any persons
22 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
23 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
24 among others.

25 m. **JANE CN-13 ROE:**

26 i. Plaintiff JANE CN-13 ROE is a female, born on 1/27/1983, who was
27 sexually abused in or around 2015 or 2016 when the sexual misconduct
28 alleged herein occurred at CCWF.

1 ii. Plaintiff JANE CN-13 ROE was committed to physical mandatory
2 confinement at CCWF where she encountered DOES Correctional Officer
3 named Garcia or Macias who had unfettered access and control, and used a
4 position of power, trust, and authority to sexually abuse and harass Plaintiff
5 JANE CN-13 ROE under color of authority on behalf of Defendants
6 CALIFORNIA and CDCR.

7 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
8 means that would justify the sexual misconduct, DOES Correctional Officer
9 named Garcia or Macias escorted Plaintiff JANE CN-13 ROE to Plaintiff
10 JANE CN-13 ROE'S medical appointment and took her into an office
11 nearby the appointment. DOES correctional officer then told Plaintiff JANE
12 CN-13 ROE that, if she did not do what she was told, the DOES correctional
13 officer would make her life a living hell. DOES correctional officer then
14 started kissing Plaintiff JANE CN-13 ROE and put his hand in Plaintiff
15 JANE CN-13 ROE'S pants before digitally penetrating Plaintiff JANE CN-
16 13 ROE'S vagina. Another time, DOES correctional officer escorted
17 Plaintiff JANE CN-13 ROE to the law library and pulled Plaintiff JANE
18 CN-13 ROE aside into a close nearby the library. Inside the closet, DOES
19 correctional officer attempted to make Plaintiff JANE CN-13 ROE perform
20 oral copulation on him. However, because Plaintiff JANE CN-13 ROE
21 refused, DOES correctional officer restrained Plaintiff JANE CN-13 ROE
22 by pulling her pants down and then digitally penetrated Plaintiff JANE CN-
23 13 ROE'S vagina. Next, the third time, DOES correctional Officer tried to
24 have intercourse with Plaintiff JANE CN-13 ROE, but she refused to
25 cooperate. Then, during a fourth incident, the DOES correctional officer
26 became aggressive when Plaintiff JANE CN-13 ROE refused to have sexual
27 intercourse with him again but, this time, he pushed Plaintiff JANE CN-13
28 ROE against a wall nearly breaking Plaintiff JANE CN-13 ROE'S arm.

1 iv. Out of fear of retaliation and further confinement, Plaintiff JANE CN-13
2 ROE only made one report of the sexual misconduct that occurred following
3 the second of four instances of sexual misconduct. Plaintiff JANE CN-13
4 ROE was fearful to make any further reports, since she never heard back
5 from her one and only, and assumed anything further would be unanswered,
6 dismissed, ignored, and bury without investigation or redress thereby
7 allowing the sexual misconduct to continue. Plaintiff JANE CN-13 ROE
8 was systematically and consistently sexually abused in the “safe haven”
9 environment created and controlled by Defendants CALIFORNIA and
10 CDCR, THE ABUSERS, DOES, and each of them.

11 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE CN-
12 13 ROE has experienced ongoing and persistent mental, emotional and
13 psychological problems, including, but not limited to: anxiety; depression;
14 feelings of helplessness; insomnia, questioning of sexual identity; lowered
15 self-esteem; moodiness; difficulty in meaningfully interacting with others
16 and intimate relationships; loss of trust and control issues with any persons
17 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
18 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
19 among others.

20 n. **JANE JH-14 ROE:**

21 i. Plaintiff JANE JH-14 ROE is a female, born on 10/27/1981, who was
22 sexually abused in or around 2022 when the sexual misconduct alleged
23 herein occurred at CCWF.

24 ii. Plaintiff JANE JH-14 ROE was committed to physical mandatory
25 confinement at CCWF where she encountered DOES Correctional Officer
26 Martinez who had unfettered access and control, and used a position of
27 power, trust, and authority to sexually abuse and harass Plaintiff JANE JH-
28

1 14 ROE under color of authority on behalf of Defendants CALIFORNIA
2 and CDCR.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, DOES Correctional Officer
5 Martinez isolated JANE JH-14 ROE alone in the laundry room where he
6 placed his hand under JANE JH-14 ROE'S pants and underwear before
7 fondling and groping JANE JH-14 ROE'S bare vagina as well as her
8 breasts. During the abuse, DOES Correctional Officer Martinez told JANE
9 JH-14 ROE she would not be getting released from CCWF in July as
10 scheduled. The sexual misconduct occurred on two (2) occasions.

11 iv. Out of fear of retaliation and further confinement, Plaintiff JANE JH-14
12 ROE never reported the sexual misconduct assuming the complaints would
13 be unanswered, dismissed, ignored, and bury without investigation or
14 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
15 JH-14 ROE was systematically and consistently sexually abused in the "safe
16 haven" environment created and controlled by Defendants CALIFORNIA
17 and CDCR, THE ABUSERS, DOES, and each of them.

18 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE JH-
19 14 ROE has experienced ongoing and persistent mental, emotional and
20 psychological problems, including, but not limited to: anxiety; depression;
21 feelings of helplessness; insomnia, questioning of sexual identity; lowered
22 self-esteem; moodiness; difficulty in meaningfully interacting with others
23 and intimate relationships; loss of trust and control issues with any persons
24 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
25 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
26 among others.

27 o. **JANE RH-15 ROE:**

- 1 i. Plaintiff JANE RH-15 ROE is a female, born on 5/21/1973, who was
2 sexually abused in or around 2019 when the sexual misconduct alleged
3 herein occurred at CCWF.
- 4 ii. Plaintiff JANE RH-15 ROE was committed to physical mandatory
5 confinement at CCWF where she encountered DOES Correctional Officer
6 Miller who had unfettered access and control, and used a position of power,
7 trust, and authority to sexually abuse and harass Plaintiff JANE RH-15 ROE
8 under color of authority on behalf of Defendants CALIFORNIA and
9 CDCR.
- 10 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
11 means that would justify the sexual misconduct, DOES Correctional Officer
12 Miller isolated Plaintiff JANE RH-15 ROE in a room while Plaintiff JANE
13 RH-15 ROE was getting cleaning supplies. At this time, DOES Correctional
14 Officer Miller kissed JANE RH-15 ROE on her lips and neck, fondled
15 JANE RH-15 ROE'S bare breasts, and reached under JANE RH-15 ROE'S
16 pants and fondled her vagina.
- 17 iv. Out of fear of retaliation and further confinement, Plaintiff JANE RH-15
18 never reported the sexual misconduct assuming the complaints would be
19 unanswered, dismissed, ignored, and bury without investigation or redress
20 thereby allowing the sexual misconduct to continue. Plaintiff JANE RH-15
21 ROE was systematically and consistently sexually abused in the "safe
22 haven" environment created and controlled by Defendants CALIFORNIA
23 and CDCR, THE ABUSERS, DOES, and each of them.
- 24 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE RH-
25 15 ROE has experienced ongoing and persistent mental, emotional and
26 psychological problems, including, but not limited to: anxiety; depression;
27 feelings of helplessness; insomnia, questioning of sexual identity; lowered
28 self-esteem; moodiness; difficulty in meaningfully interacting with others

1 and intimate relationships; loss of trust and control issues with any persons
2 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
3 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
4 among others.

5 p. **JANE AM-16 ROE:**

- 6 i. Plaintiff JANE AM-16 ROE is a female, born on 1/5/1974, who was
7 sexually abused in or around 2013 and 2014 when the sexual misconduct
8 alleged herein occurred at CCWF.
- 9 ii. Plaintiff JANE AM-16 ROE was committed to physical mandatory
10 confinement at CCWF where she encountered DOES Correctional Officer
11 Malanado who had unfettered access and control, and used a position of
12 power, trust, and authority to sexually abuse and harass JANE AM-16 ROE
13 under color of authority on behalf of Defendants CALIFORNIA and
14 CDCR.
- 15 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
16 means that would justify the sexual misconduct, DOES Correctional Officer
17 Malanado was releasing JANE AM-16 ROE individually for a shower on
18 two (2) occasions when he reached inside of JANE AM-16 ROE’S pants
19 from the back and specifically for JANE AM-16 ROE’S anus, which he
20 then fondled.
- 21 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AM-16
22 ROE reported the sexual misconduct assuming the complaints would be
23 unanswered, dismissed, ignored, and bury without investigation or redress
24 thereby allowing the sexual misconduct to continue. JANE AM-16 ROE
25 was systematically and consistently sexually abused in the “safe haven”
26 environment created and controlled by Defendants CALIFORNIA and
27 CDCR, THE ABUSERS, DOES, and each of them.
- 28

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AM-
2 16 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; difficulty in meaningfully interacting with others
6 and intimate relationships; loss of trust and control issues with any persons
7 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
8 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
9 among others.

10 q. **JANE JW-17 ROE:**

11 i. Plaintiff JANE JW-17 ROE is a female, born on 6/7/1980, who was sexually
12 abused in or around 2022 and 2023 when the sexual misconduct alleged
13 herein occurred at CCWF.

14 ii. Plaintiff JANE JW-17 ROE was committed to physical mandatory
15 confinement at CCWF where she encountered DOES Correctional Officer
16 Davis who had unfettered access and control, and used a position of power,
17 trust, and authority to sexually abuse and harass Plaintiff JANE JW-17 ROE
18 under color of authority on behalf of Defendants CALIFORNIA and
19 CDCR, THE ABUSERS, DOES, and each of them.

20 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
21 means that would justify the sexual misconduct, DOES Correctional Officer
22 Davis entered Plaintiff JANE JW-17 ROE'S cell where he pushed Plaintiff
23 JANE JW-17 ROE down on her bed and put his mouth on JANE JW-17
24 ROE'S vagina. On another occasion, DOES Correctional Officer Davis
25 shoved his hand down JANE JW-17 ROE'S pants multiple times and forced
26 JANE JW-17 ROE to perform oral copulation on him. During a different
27 encounter, DOES Correctional Officer Davis raped JANE JW-17 ROE
28 while in the supply closet.

1 iv. Out of fear of retaliation and further confinement, Plaintiff JANE JW-17
2 ROE never reported the sexual misconduct assuming the complaints would
3 be unanswered, dismissed, ignored, and bury without investigation or
4 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
5 JW-17 ROE was systematically and consistently sexually abused in the
6 “safe haven” environment created and controlled by Defendants
7 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

8 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE JW-
9 17 ROE has experienced ongoing and persistent mental, emotional and
10 psychological problems, including, but not limited to: anxiety; depression;
11 feelings of helplessness; insomnia, questioning of sexual identity; lowered
12 self-esteem; moodiness; difficulty in meaningfully interacting with others
13 and intimate relationships; loss of trust and control issues with any persons
14 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
15 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
16 among others.

17 r. **JANE TL-18 ROE:**

18 i. Plaintiff JANE TL-18 ROE is a female, born on 9/27/1989, who was
19 sexually abused in or around 2013 when the sexual misconduct alleged
20 herein occurred at CCWF.

21 ii. Plaintiff JANE TL-18 ROE was committed to physical mandatory
22 confinement at CCWF where she encountered DOES Correctional Officer
23 Gomez who had unfettered access and control, and used a position of power,
24 trust, and authority to sexually abuse and harass Plaintiff JANE TL-18 ROE
25 under color of authority on behalf of Defendants CALIFORNIA and
26 CDCR, THE ABUSERS, DOES, and each of them.

27 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
28 means that would justify the sexual misconduct, DOES Correctional Officer

1 Gomez forced Plaintiff JANE TL-18 ROE into the porter closet forced
2 Plaintiff JANE TL-18 ROE to perform oral copulation on him before raping
3 Plaintiff JANE TL-18 ROE'S vagina with his penis.

4 iv. Out of fear of retaliation and further confinement, Plaintiff JANE TL-18
5 ROE never reported the sexual misconduct assuming the complaints would
6 be unanswered, dismissed, ignored, and bury without investigation or
7 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
8 TL-18 ROE was systematically and consistently sexually abused in the
9 "safe haven" environment created and controlled by Defendants
10 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

11 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE TL-
12 18 ROE has experienced ongoing and persistent mental, emotional and
13 psychological problems, including, but not limited to: anxiety; depression;
14 feelings of helplessness; insomnia, questioning of sexual identity; lowered
15 self-esteem; moodiness; difficulty in meaningfully interacting with others
16 and intimate relationships; loss of trust and control issues with any persons
17 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
18 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
19 among others.

20 s. **JANE TA-19 ROE:**

21 i. Plaintiff JANE TA-19 ROE is a female, born on 6/1/1992, who was sexually
22 abused in or around 2017 when the sexual misconduct alleged herein
23 occurred at CCWF.

24 ii. Plaintiff JANE TA-19 ROE was committed to physical mandatory
25 confinement at CCWF where she encountered DOES Correctional Officer
26 Mills and DOES Correctional Officer Hernandez who had unfettered access
27 and control, and used a position of power, trust, and authority to sexually
28 abuse and harass Plaintiff JANE TA-19 ROE under color of authority on

1 behalf of Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES,
2 and each of them.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, DOES Correctional Officer
5 Mills sexually assaulted Plaintiff JANE TA-19 ROE at night in the utility
6 room and kitchen. Correctional Officer Mills gave Plaintiff JANE TA-19
7 ROE a job she wanted by way of sexual exchange; DOES Correctional
8 Officer Mills asked Plaintiff JANE TA-19 ROE to show him her breasts in
9 exchange for a job. A couple days into working on the new job, Correctional
10 Officer Mills put his hand under Plaintiff JANE TA-19 ROE'S pants and
11 then digitally penetrated Plaintiff JANE TA-19 ROE'S anal area with his
12 bare fingers. After this incident, Plaintiff JANE TA-19 ROE was taken to a
13 utility room where DOES Correctional Officer Mills threatened her and
14 forced her to perform the same sexual act, which then occurred. DOES
15 Correctional Officer Mills also fondled Plaintiff JANE TA-19 ROE'S bare
16 breasts and digitally penetrated Plaintiff JANE TA-19 ROE'S vagina while
17 putting his hand over Plaintiff JANE TA-19 ROE'S mouth to remain quiet.
18 DOES Correctional Officer Mills also tried to forcefully penetrate Plaintiff
19 JANE TA-19 ROE'S vagina with his penis and put Plaintiff JANE TA-19
20 ROE'S hand onto his penis. These instances of sexual assault took place
21 nearly 30 to forty times. On other occasions, DOES Correctional Officer
22 Hernandez pulled Plaintiff JANE TA-19 ROE aside when she attended
23 school at CCWF. DOES Correctional Officer Hernandez then touched
24 JANE TA-19 ROE'S bare breasts and her buttocks, which occurred on two
25 occasions.

26 iv. Out of fear of retaliation and further confinement, Plaintiff JANE TA-19
27 ROE never reported the sexual misconduct assuming the complaints would
28 be unanswered, dismissed, ignored, and bury without investigation or

1 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
2 TA-19 ROE was systematically and consistently sexually abused in the
3 “safe haven” environment created and controlled by Defendants
4 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

5 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE TA-
6 19 ROE has experienced ongoing and persistent mental, emotional and
7 psychological problems, including, but not limited to: anxiety; depression;
8 feelings of helplessness; insomnia, questioning of sexual identity; lowered
9 self-esteem; moodiness; difficulty in meaningfully interacting with others
10 and intimate relationships; loss of trust and control issues with any persons
11 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
12 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
13 among others.

14 t. **JANE MF-20 ROE:**

- 15 i. Plaintiff JANE MF-20 ROE is a female, born on 8/1/1984, who was
16 sexually abused in or around 2014 when the sexual misconduct alleged
17 herein occurred at CCWF.
- 18 ii. Plaintiff JANE MF-20 was committed to physical mandatory confinement
19 at CCWF where she encountered DOES Correctional Officer Martinez who
20 had unfettered access and control, and used a position of power, trust, and
21 authority to sexually abuse and harass Plaintiff JANE MF-20 under color of
22 authority on behalf of Defendants CALIFORNIA and CDCR, THE
23 ABUSERS, DOES, and each of them.
- 24 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
25 means that would justify the sexual misconduct, DOES Correctional Officer
26 Martinez forced Plaintiff JANE MF-20, who was pregnant at the time, to
27 perform oral copulation him and ejaculated on Plaintiff JANE MF-20’S
28 anus and masturbated on her. DOES Correctional Officer Martinez also

1 forced JANE MF-20 to have sexual intercourse where he put his penis
2 inside of JANE MF-20'S vagina. The oral sexual acts, masturbation, and
3 sexual intercourse fluctuated, but the sexual acts in total occurred
4 approximately eight (8) times.

5 iv. Out of fear of retaliation and further confinement, Plaintiff JANE MF-20
6 never reported the sexual misconduct assuming the complaints would be
7 unanswered, dismissed, ignored, and bury without investigation or redress
8 thereby allowing the sexual misconduct to continue. Plaintiff JANE MF-20
9 was systematically and consistently sexually abused in the "safe haven"
10 environment created and controlled by Defendants CALIFORNIA and
11 CDCR, THE ABUSERS, DOES, and each of them.

12 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE MF-
13 20 ROE has experienced ongoing and persistent mental, emotional and
14 psychological problems, including, but not limited to: anxiety; depression;
15 feelings of helplessness; insomnia, questioning of sexual identity; lowered
16 self-esteem; moodiness; difficulty in meaningfully interacting with others
17 and intimate relationships; loss of trust and control issues with any persons
18 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
19 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
20 among others. Plaintiff JANE MF-20 attempted suicide twice and drinks
21 alcohol frequently.

22 u. **JANE RC-21 ROE:**

23 i. Plaintiff JANE RC-21 ROE is a female, born on 9/13/1985, who was
24 sexually abused in or around 2018 and 2019 when the sexual misconduct
25 alleged herein occurred at CIW.

26 ii. Plaintiff JANE RC-21 ROE was committed to physical mandatory
27 confinement at CIW where she encountered Defendant Correctional Officer
28 Francisco Tapia who had unfettered access and control, and used a position

1 of power, trust, and authority to sexually abuse and harass Plaintiff JANE
2 RC-21 ROE under color of authority on behalf of Defendants
3 CALIFORNIA and CDCR.

4 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
5 means that would justify the sexual misconduct, Plaintiff JANE RC-21
6 ROE went to Defendant Correctional Officer Tapia's office to ask him
7 about JANE RC-21 ROE's bed since another inmate took her bed.
8 Defendant Correctional Officer Tapia then ordered Plaintiff JANE RC-21
9 ROE to sit down before putting his hand in Plaintiff JANE RC-21 ROE'S
10 pants and digitally penetrating Plaintiff JANE RC-21 ROE'S vagina.

11 iv. Out of fear of retaliation and further confinement, Plaintiff JANE RC-21
12 ROE never reported the sexual misconduct assuming the complaints would
13 be unanswered, dismissed, ignored, and bury without investigation or
14 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
15 RC-21 ROE was systematically and consistently sexually abused in the
16 "safe haven" environment created and controlled by Defendants
17 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

18 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE RC-
19 21 ROE has experienced ongoing and persistent mental, emotional and
20 psychological problems, including, but not limited to: anxiety; depression;
21 feelings of helplessness; insomnia, questioning of sexual identity; lowered
22 self-esteem; moodiness; difficulty in meaningfully interacting with others
23 and intimate relationships; loss of trust and control issues with any persons
24 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
25 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
26 among others.

27 v. **JANE SC-22 ROE:**

- 1 i. Plaintiff JANE SC-22 ROE is a female, born on 1/22/1973, who was
2 sexually abused in or around 2014 and 2015 when the sexual misconduct
3 alleged herein occurred at CCWF.
- 4 ii. Plaintiff JANE SC-22 ROE was committed to physical mandatory
5 confinement at CCWF where she encountered Defendant Correctional
6 Officer James White who had unfettered access and control, and used a
7 position of power, trust, and authority to sexually abuse and harass Plaintiff
8 JANE SC-22 ROE under color of authority on behalf of Defendants
9 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 10 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
11 means that would justify the sexual misconduct, Defendant Correctional
12 Officer White isolated Plaintiff JANE SC-22 ROE, watched Plaintiff JANE
13 SC-22 ROE change her clothing, and groped Plaintiff JANE SC-22 ROE'S
14 vagina and breasts.
- 15 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SC-22
16 ROE never reported the sexual misconduct assuming the complaints would
17 be unanswered, dismissed, ignored, and bury without investigation or
18 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
19 SC-22 ROE was systematically and consistently sexually abused in the
20 "safe haven" environment created and controlled by Defendants
21 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 22 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SC-
23 22 ROE has experienced ongoing and persistent mental, emotional and
24 psychological problems, including, but not limited to: anxiety; depression;
25 feelings of helplessness; insomnia, questioning of sexual identity; lowered
26 self-esteem; moodiness; difficulty in meaningfully interacting with others
27 and intimate relationships; loss of trust and control issues with any persons
28 in a position of authority and trust; flashbacks and intrusive thoughts; stress;

1 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
2 among others.

3 w. **JANE KJ-23 ROE:**

4 i. Plaintiff JANE KJ-23 ROE is a female, born on 7/10/1989, who was
5 sexually abused in or around 2019 when the sexual misconduct alleged
6 herein occurred at CCWF.

7 ii. Plaintiff JANE KJ-23 ROE was committed to physical mandatory
8 confinement at CCWF where she encountered Defendant Correctional
9 Officer Anthony Branco who had unfettered access and control, and used a
10 position of power, trust, and authority to sexually abuse and harass Plaintiff
11 JANE KJ-23 ROE under color of authority on behalf of Defendants
12 CALIFORNIA and CDCR.

13 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
14 means that would justify the sexual misconduct, Defendant Correctional
15 Officer Branco took Plaintiff JANE KJ-23 ROE out of Plaintiff JANE KJ-
16 23 ROE'S cell to take the trash out in the middle of the night. At this time,
17 Defendant Correctional Officer Branco pushed Plaintiff JANE KJ-23 ROE
18 into a closet where he grabbed Plaintiff JANE KJ-23 ROE'S hands and
19 placed them onto his penis. Next, on three (3) other occasions, Defendant
20 Correctional Officer Branco took Plaintiff JANE KJ-23 ROE outside to
21 throw out trash and then to a closet where he put his hands up Plaintiff JANE
22 KJ-23 ROE'S shirt, grabbing Plaintiff JANE KJ-23 ROE'S breasts.

23 iv. Out of fear of retaliation and further confinement, Plaintiff JANE KJ-23
24 never reported the sexual misconduct assuming the complaints would be
25 unanswered, dismissed, ignored, and bury without investigation or redress
26 thereby allowing the sexual misconduct to continue. Plaintiff JANE KJ-23
27 was systematically and consistently sexually abused in the "safe haven"
28

1 environment created and controlled by Defendants CALIFORNIA and
2 CDCR, THE ABUSERS, DOES, and each of them.

3 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE KJ-
4 23 ROE has experienced ongoing and persistent mental, emotional and
5 psychological problems, including, but not limited to: anxiety; depression;
6 feelings of helplessness; insomnia, questioning of sexual identity; lowered
7 self-esteem; moodiness; difficulty in meaningfully interacting with others
8 and intimate relationships; loss of trust and control issues with any persons
9 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
10 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
11 among others.

12 x. **JANE RG-24 ROE:**

- 13 i. Plaintiff JANE RG-24 ROE is a female, born on 12/31/1982, who was
14 sexually abused in or around 2021 when the sexual misconduct alleged
15 herein occurred at CCWF.
- 16 ii. Plaintiff JANE RG-24 ROE was committed to physical mandatory
17 confinement at CCWF where she encountered DOES Correctional Officer
18 Rodriguez who had unfettered access and control, and used a position of
19 power, trust, and authority to sexually abuse and harass Plaintiff JANE RG-
20 24 ROE under color of authority on behalf of Defendants CALIFORNIA
21 and CDCR, THE ABUSERS, DOES, and each of them.
- 22 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
23 means that would justify the sexual misconduct, DOES Correctional Officer
24 Rodriguez coerced Plaintiff JANE RG-24 into having sexual intercourse
25 with him and performing oral copulation on him on four (4) to five (5)
26 occasions in various locations including the hall and janitor's closet.
- 27 iv. Out of fear of retaliation and further confinement, Plaintiff JANE RG-24
28 ROE never reported the sexual misconduct assuming the complaints would

1 be unanswered, dismissed, ignored, and bury without investigation or
2 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
3 RG-24 ROE was systematically and consistently sexually abused in the
4 “safe haven” environment created and controlled by Defendants
5 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

6 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE RG-
7 24 ROE has experienced ongoing and persistent mental, emotional and
8 psychological problems, including, but not limited to: anxiety; depression;
9 feelings of helplessness; insomnia, questioning of sexual identity; lowered
10 self-esteem; moodiness; difficulty in meaningfully interacting with others
11 and intimate relationships; loss of trust and control issues with any persons
12 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
13 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
14 among others.

15 y. **JANE TS-25 ROE:**

- 16 i. Plaintiff JANE TS-25 ROE is a female, born on 8/31/1973, who was
17 sexually abused in or around 2017 when the sexual misconduct alleged
18 herein occurred at CCWF.
- 19 ii. Plaintiff JANE TS-25 ROE was committed to physical mandatory
20 confinement at CCWF where she encountered Defendant Correctional
21 Officer Gregory Rodriguez who had unfettered access and control, and used
22 a position of power, trust, and authority to sexually abuse and harass
23 Plaintiff JANE TS-25 ROE under color of authority on behalf of Defendants
24 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 25 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
26 means that would justify the sexual misconduct, Defendant Correctional
27 Officer Rodriguez stopped Plaintiff JANE TS-25 ROE and wrote her up for
28 being late to return from lunch. Defendant Correctional Officer Rodriguez

1 then told Plaintiff JANE TS-25 ROE to meet with him the following week
2 to discuss the write-up. In the meanwhile, Defendant Correctional Officer
3 Rodriguez raided Plaintiff JANE TS-25 ROE'S cell. While inside her cell,
4 Defendant Correctional Officer Rodriguez told Plaintiff JANE TS-25 ROE
5 to put her hand into the cell and into his pocket had a hole where his penis
6 was polking through, asking Plaintiff JANE TS-25 ROE to stroke his penis,
7 for which Plaintiff JANE TS-25 ROE complied, to the point he ejaculated.
8 On another occasion, Defendant Correctional Officer Rodriguez forced
9 JANE TS-25 ROE to miss a meal when he instead digitally penetrated
10 JANE TS-25 ROE'S vagina.

11 iv. Out of fear of retaliation and further confinement, Plaintiff JANE TS-25
12 ROE never reported the sexual misconduct assuming the complaints would
13 be unanswered, dismissed, ignored, and bury without investigation or
14 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
15 TS-25 ROE was systematically and consistently sexually abused in the
16 "safe haven" environment created and controlled by Defendants
17 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

18 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE TS-
19 25 ROE has experienced ongoing and persistent mental, emotional and
20 psychological problems, including, but not limited to: anxiety; depression;
21 feelings of helplessness; insomnia, questioning of sexual identity; lowered
22 self-esteem; moodiness; difficulty in meaningfully interacting with others
23 and intimate relationships; refusal to engage in sexual intercourse; loss of
24 trust and control issues with any persons in a position of authority and trust;
25 flashbacks and intrusive thoughts; stress; nervousness; fear;
26 embarrassment; shame; and loss of enjoyment of life, among others.

27 z. **JANE TM-26 ROE:**

- 1 i. Plaintiff JANE TM-26 ROE is a female, born on 12/11/1967, who was
2 sexually abused in or around 2014 when the sexual misconduct alleged
3 herein occurred at CCWF.
- 4 ii. Plaintiff JANE TM-26 ROE was committed to physical mandatory
5 confinement at CCWF where she encountered Defendant Correctional
6 Officer Ed Schmitz and Defendant Correctional Officer Israel Trevino who
7 had unfettered access and control, and used a position of power, trust, and
8 authority to sexually abuse and harass JANE TM-26 ROE under color of
9 authority on behalf of Defendants CALIFORNIA and CDCR, THE
10 ABUSERS, DOES, and each of them.
- 11 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
12 means that would justify the sexual misconduct, Defendant Correctional
13 Officer Ed Schmitz provided Plaintiff JANE TM-26 ROE with additional
14 phone time and privileges but began fondling Plaintiff JANE TM-26 ROE'S
15 vagina as a form of payment. Further, Defendant Correctional Officer Israel
16 Trevino aggressively fondled Plaintiff JANE TM-26 ROE'S breasts and
17 vagina. The sexual misconduct inflicted on Plaintiff JANE TM-26 ROE
18 occurred approximately ten (10) times.
- 19 iv. Out of fear of retaliation and further confinement, Plaintiff JANE TM-26
20 ROE never reported the sexual misconduct assuming the complaints would
21 be unanswered, dismissed, ignored, and bury without investigation or
22 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
23 TM-26 ROE was systematically and consistently sexually abused in the
24 "safe haven" environment created and controlled by Defendants
25 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 26 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE TM-
27 26 ROE has experienced ongoing and persistent mental, emotional and
28 psychological problems, including, but not limited to: anxiety; depression;

1 feelings of helplessness; insomnia, questioning of sexual identity; lowered
2 self-esteem; moodiness; difficulty in meaningfully interacting with others
3 and intimate relationships; loss of trust and control issues with any persons
4 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
5 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
6 among others.

7 aa. **JANE LT-27 ROE:**

- 8 i. Plaintiff JANE LT-27 ROE is a female, born on 12/6/1985, who was
9 sexually abused in or around 2011 and 2012 when the sexual misconduct
10 alleged herein occurred at CCWF.
- 11 ii. Plaintiff JANE LT-27 ROE was committed to physical mandatory
12 confinement at CCWF where she encountered DOES Correctional Officer
13 Johnson who had unfettered access and control, and used a position of
14 power, trust, and authority to sexually abuse and harass Plaintiff JANE LT-
15 27 ROE under color of authority on behalf of Defendants CALIFORNIA
16 and CDCR, THE ABUSERS, DOES, and each of them.
- 17 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
18 means that would justify the sexual misconduct, DOES Correctional Officer
19 Johnson pushed Plaintiff JANE LT-27 ROE against a wall when Plaintiff
20 JANE LT-27 ROE was on her way to take an educational class, removed
21 Plaintiff JANE LT-27 ROE'S pants and underwear, and then fondled
22 Plaintiff JANE LT-27 ROE'S vagina with his bare hands. DOES
23 Correctional Officer Johnson then penetrated Plaintiff JANE LT-27 ROE'S
24 vagina with his penis.
- 25 iv. Out of fear of retaliation and further confinement, Plaintiff JANE LT-27
26 ROE never reported the sexual misconduct assuming the complaints would
27 be unanswered, dismissed, ignored, and bury without investigation or
28 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE

1 LT-27 ROE was systematically and consistently sexually abused in the
2 “safe haven” environment created and controlled by Defendants
3 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 4 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE LT-
5 27 ROE has experienced ongoing and persistent mental, emotional and
6 psychological problems, including, but not limited to: anxiety; depression;
7 feelings of helplessness; insomnia, questioning of sexual identity; lowered
8 self-esteem; moodiness; difficulty in meaningfully interacting with others
9 and intimate relationships; loss of trust and control issues with any persons
10 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
11 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
12 among others.

13 **bb. JANE MM-28 ROE:**

- 14 i. Plaintiff JANE MM-28 ROE is a female, born on 7/23/1978, who was
15 sexually abused in or around 2022 when the sexual misconduct alleged
16 herein occurred at CCWF.
- 17 ii. Plaintiff JANE MM-28 ROE was committed to physical mandatory
18 confinement at CCWF where she encountered DOES Correctional Officer
19 Birsinio who had unfettered access and control, and used a position of
20 power, trust, and authority to sexually abuse and harass JANE MM-28 ROE
21 under color of authority on behalf of Defendants CALIFORNIA and
22 CDCR, THE ABUSERS, DOES, and each of them.
- 23 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
24 means that would justify the sexual misconduct, DOES Correctional Officer
25 Birsinio watched Plaintiff JANE MM-28 ROE on the yard during workout
26 time, pointed Plaintiff JANE MM-28 ROE out one day, and offered Plaintiff
27 JANE MM-28 ROE to be a porter for the day so as to receive additional
28 privileges such as an extra phone call. Plaintiff JANE MM-28 ROE did the

1 portering thereafter for an entire day with DOES Correctional Officer
2 Birsinio. However, the following day, DOES Correctional Officer Birsinio
3 asked Plaintiff JANE MM-28 ROE to come out to the storage shed to move
4 boxes, but the shed was empty. DOES Correctional Officer Birsinio next,
5 having looked up Plaintiff JANE MM-28 ROE on social media, brought up
6 revealing photos of Plaintiff JANE MM-28 ROE in a derogatory manner
7 and said he liked seeing her “ass” in the photographs. DOES Correctional
8 Officer Birsinio then made Plaintiff JANE MM-28 ROE perform oral
9 copulation on him.

10 iv. Out of fear of retaliation and further confinement, Plaintiff JANE MM-28
11 ROE never reported the sexual misconduct assuming the complaints would
12 be unanswered, dismissed, ignored, and bury without investigation or
13 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
14 MM-28 ROE was systematically and consistently sexually abused in the
15 “safe haven” environment created and controlled by Defendants
16 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

17 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE MM-
18 28 ROE has experienced ongoing and persistent mental, emotional and
19 psychological problems, including, but not limited to: anxiety; depression;
20 feelings of helplessness; insomnia, questioning of sexual identity; lowered
21 self-esteem; moodiness; difficulty in meaningfully interacting with others
22 and intimate relationships; loss of trust and control issues with any persons
23 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
24 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
25 among others.

26 cc. **JANE DW-29 ROE:**

- 1 i. Plaintiff JANE DW-29 ROE is a female, born on 12/7/1969, who was
2 sexually abused in or around 2014 to 2016 when the sexual misconduct
3 alleged herein occurred at CCWF.
- 4 ii. Plaintiff JANE DW-29 ROE was committed to physical mandatory
5 confinement at CCWF where she encountered DOES Correctional Officer
6 Pancotti who had unfettered access and control, and used a position of
7 power, trust, and authority to sexually abuse and harass CCWF under color
8 of authority on behalf of Defendants CALIFORNIA and CDCR, THE
9 ABUSERS, DOES, and each of them.
- 10 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
11 means that would justify the sexual misconduct, DOES Correctional Officer
12 Pancotti took Plaintiff JANE DW-29 ROE behind a building and told
13 Plaintiff JANE DW-29 ROE to “show me the pink,” which was prison talk
14 to pull Plaintiff JANE DW-29 ROE’S pants down and show her vagina.
15 DOES Correctional Officer Pancotti then took off his gloves and fondled
16 and digitally penetrated Plaintiff JANE DW-29 ROE’S vagina. DOES
17 Correctional Officer Pancotti’s other hand went into his pants and he
18 masturbated himself while digitally penetrating Plaintiff JANE DW-29
19 ROE’S vagina. The sexual misconduct inflicted on Plaintiff JANE DW-29
20 ROE occurred 10-15 times and, after each instance, DOES Correctional
21 Officer Pancotti said, “You know the business.”
- 22 iv. Out of fear of retaliation and further confinement, Plaintiff JANE DW-29
23 ROE never reported the sexual misconduct assuming the complaints would
24 be unanswered, dismissed, ignored, and bury without investigation or
25 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
26 DW-29 ROE was systematically and consistently sexually abused in the
27 “safe haven” environment created and controlled by Defendants
28 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE DW-
2 29 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; difficulty in meaningfully interacting with others
6 and intimate relationships; loss of trust and control issues with any persons
7 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
8 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
9 among others.

10 dd. **JANE JJ-30 ROE:**

- 11 i. Plaintiff JANE JJ-30 ROE is a female, born on 8/2/1959, who was sexually
12 abused in or around 2019 when the sexual misconduct alleged herein
13 occurred at CCWF.
- 14 ii. Plaintiff JANE JJ-30 ROE was committed to physical mandatory
15 confinement at CCWF where she encountered DOES Correctional Officer
16 Perez who had unfettered access and control, and used a position of power,
17 trust, and authority to sexually abuse and harass Plaintiff JANE JJ-30 ROE
18 under color of authority on behalf of Defendants CALIFORNIA and
19 CDCR, THE ABUSERS, DOES, and each of them.
- 20 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
21 means that would justify the sexual misconduct, DOES Correctional Officer
22 Perez sexually assaulted Plaintiff JANE JJ-30 ROE when she was
23 hospitalized for 2 days due to illness. During this time, a small alarm went
24 off in Plaintiff JANE JJ-30 ROE'S hospital room and she went to turn it off.
25 However, because Plaintiff JANE JJ-30 ROE was too tired to turn the alarm
26 off, DOES Correctional Officer helped himself into Plaintiff JANE JJ-30
27 ROE'S room and reached underneath Plaintiff JANE JJ-30 ROE'S hospital
28 gown, thereby groping Plaintiff JANE JJ-30 ROE'S vagina. Plaintiff JANE

1 JJ-30 ROE began to scream for help, screaming that DOES Correctional
2 Officer Perez should not be in Plaintiff JANE JJ-30 ROE'S room to begin
3 with. DOES Correctional Officer Perez was then relieved of his duties due
4 to the subject incident.

5 iv. Out of fear of retaliation and further confinement, Plaintiff JANE JJ-30
6 ROE never reported the sexual misconduct assuming the complaints would
7 be unanswered, dismissed, ignored, and bury without investigation or
8 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
9 JJ-30 ROE was systematically and consistently sexually abused in the "safe
10 haven" environment created and controlled by Defendants CALIFORNIA
11 and CDCR, THE ABUSERS, DOES, and each of them.

12 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE JJ-30
13 ROE has experienced ongoing and persistent mental, emotional and
14 psychological problems, including, but not limited to: anxiety; depression;
15 feelings of helplessness; insomnia, questioning of sexual identity; lowered
16 self-esteem; moodiness; difficulty in meaningfully interacting with others
17 and intimate relationships; loss of trust and control issues with any persons
18 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
19 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
20 among others.

21 ee. **JANE SK-31 ROE:**

22 i. Plaintiff JANE SK-31 ROE is a female, born on 11/12/1992, who was
23 sexually abused in or around 2016 when the sexual misconduct alleged
24 herein occurred at CCWF.

25 ii. Plaintiff JANE SK-31 ROE was committed to physical mandatory
26 confinement at CCWF where she encountered Defendant Correctional
27 Officer Steve Alarcon and DOES Correctional Officer Martinez who had
28 unfettered access and control, and used a position of power, trust, and

1 authority to sexually abuse and harass Plaintiff JANE SK-31 ROE under
2 color of authority on behalf of Defendants CALIFORNIA and CDCR, THE
3 ABUSERS, DOES, and each of them.

4 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
5 means that would justify the sexual misconduct, Defendant Correctional
6 Officer Alarcon and DOES Correctional Officer Martinez sexually
7 assaulted Plaintiff JANE SK-31 ROE a total of nine (9) times. During the
8 first incident through the seventh, Plaintiff JANE SK-31 ROE worked in
9 the Bravo Clinic for a year beginning in 2016. During this time, Defendant
10 Correctional Officer Alarcon entered a utility closet, which was also the
11 restroom for inmates, and put his bare hand down Plaintiff JANE SK-31
12 ROE'S pants and fondled Plaintiff JANE SK-31 ROE'S vagina. During the
13 eighth incident, Defendant Correctional Officer Alarcon grabbed JANE
14 SK-31 ROE by her neck and tried to force JANE SK-31 ROE to kiss him
15 while fondling JANE SK-31 ROE'S vagina. During the ninth incident,
16 while working as a porter in the day room, DOES Correctional Officer
17 Martinez grabbed JANE SK-31 ROE from behind and put his bare hands
18 on JANE SK-31 ROE'S bare lower abdomen attempting to put his hands
19 down JANE SK-31 ROE'S pants, but JANE SK-31 ROE was able to fight
20 back.

21 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SK-31
22 ROE never reported the sexual misconduct assuming the complaints would
23 be unanswered, dismissed, ignored, and bury without investigation or
24 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
25 SK-31 ROE was systematically and consistently sexually abused in the
26 "safe haven" environment created and controlled by Defendants
27 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SK-
2 31 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; difficulty in meaningfully interacting with others
6 and intimate relationships; loss of trust and control issues with any persons
7 in a position of authority and trust; flashbacks and intrusive thoughts; stress;
8 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
9 among others.

10 ff. **JANE JM-32 ROE:**

- 11 i. Plaintiff JANE JM-32 ROE is a female, born on 4/2/1982, who was sexually
12 abused in or around 2022 when the sexual misconduct alleged herein
13 occurred at CCWF.
- 14 ii. Plaintiff JANE JM-32 ROE was committed to physical mandatory
15 confinement at CCWF where she encountered DOES Correctional Officer
16 Davis who had unfettered access and control, and used a position of power,
17 trust, and authority to sexually abuse and harass Plaintiff JANE JM-32 ROE
18 under color of authority on behalf of Defendants CALIFORNIA and
19 CDCR, THE ABUSERS, DOES, and each of them.
- 20 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
21 means that would justify the sexual misconduct, DOES Correctional Officer
22 Davis constantly made sexually related comments directed at Plaintiff
23 JANE JM-32 ROE and thereafter groped Plaintiff JANE JM-32 ROE'S
24 buttocks before putting his hand down Plaintiff JANE JM-32 ROE'S pants
25 and digitally penetrating Plaintiff JANE JM-32 ROE'S vagina. When
26 Plaintiff JANE JM-32 ROE'S reacted negatively toward the sexual
27 misconduct, DOES Correctional Officer took away Plaintiff JANE JM-32
28 ROE'S phone privileges.

- 1 iv. Out of fear of retaliation and further confinement, Plaintiff JANE JM-32
2 ROE never reported the sexual misconduct assuming the complaints would
3 be unanswered, dismissed, ignored, and bury without investigation or
4 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
5 JM-32 ROE was systematically and consistently sexually abused in the
6 “safe haven” environment created and controlled by Defendants
7 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 8 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE JM-
9 32 ROE has experienced ongoing and persistent mental, emotional and
10 psychological problems, including, but not limited to: anxiety; depression;
11 feelings of helplessness; insomnia, questioning of sexual identity; lowered
12 self-esteem; moodiness; difficulty in meaningfully interacting with others
13 and intimate relationships; loss of trust and control issues with any persons
14 in a position of authority and trust; loss of trust for and fear of police officers
15 and men; flashbacks and intrusive thoughts; stress; nervousness; fear;
16 embarrassment; shame; and loss of enjoyment of life, among others.

17 gg. **JANE SM-33 ROE:**

- 18 i. Plaintiff JANE SM-33 ROE is a female, born on 2/25/1992, who was
19 sexually abused in or around 2014 when the sexual misconduct alleged
20 herein occurred at CIW.
- 21 ii. Plaintiff JANE SM-33 ROE was committed to physical mandatory
22 confinement at CIW where she encountered Defendant Correctional Officer
23 Gary Turner R. Jr. who had unfettered access and control, and used a
24 position of power, trust, and authority to sexually abuse and harass Plaintiff
25 JANE SM-33 ROE under color of authority on behalf of Defendants
26 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 27 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
28 means that would justify the sexual misconduct, Defendant Correctional

1 Officer Gary Turner R. Jr. came to JANE SM-33 ROE'S cell door, claiming
2 that a lieutenant wanted to speak with JANE SM-33 ROE. In response,
3 Plaintiff JANE SM-33 ROE presented to the front office where Defendant
4 Correctional Officer Gary Turner R. Jr. began kissing JANE SM-33 ROE
5 and putting his tongue down JANE SM-33 ROE'S throat. Defendant
6 Correctional Officer Gary Turner R. Jr. next put his fingers down JANE
7 SM-33 ROE'S underwear and touched JANE SM-33 ROE'S vagina,
8 digitally penetrating her vaginal canal. Further, Defendant Correctional
9 Officer Gary Turner R. Jr. was very persistent on having sexual intercourse
10 with JANE SM-33 ROE. Defendant Correctional Officer Turner brought
11 contraband to CIW as a form of payment for sexual favors.

12 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SM-33
13 ROE never reported the sexual misconduct assuming the complaints would
14 be unanswered, dismissed, ignored, and bury without investigation or
15 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
16 SM-33 ROE was systematically and consistently sexually abused in the
17 "safe haven" environment created and controlled by Defendants
18 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

19 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SM-
20 33 ROE has experienced ongoing and persistent mental, emotional and
21 psychological problems, including, but not limited to: anxiety; depression;
22 feelings of helplessness; insomnia, questioning of sexual identity; lowered
23 self-esteem; moodiness; difficulty in meaningfully interacting with others
24 and intimate relationships; loss of trust and control issues with any persons
25 in a position of authority and trust; loss of trust for and fear of police officers
26 and men; flashbacks and intrusive thoughts; stress; nervousness; fear;
27 embarrassment; shame; and loss of enjoyment of life, among others.

28 hh. **JANE ED-34 ROE:**

- 1 i. Plaintiff JANE ED-34 ROE is a female, born on 4/13/1993, who was
2 sexually abused in or around 2021 when the sexual misconduct alleged
3 herein occurred at CCWF.
- 4 ii. Plaintiff JANE ED-34 ROE was committed to physical mandatory
5 confinement at CCWF where she encountered DOES Correctional Officer
6 Martin who had unfettered access and control, and used a position of power,
7 trust, and authority to sexually abuse and harass Plaintiff JANE ED-34 ROE
8 under color of authority on behalf of Defendants CALIFORNIA and
9 CDCR, THE ABUSERS, DOES, and each of them.
- 10 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
11 means that would justify the sexual misconduct, DOES Correctional Officer
12 Martin forced Plaintiff JANE ED-34 ROE to go into a portable restroom in
13 the C-yard and, on several occasions, groping Plaintiff JANE ED-34 ROE’S
14 breasts and buttocks. On another occasion, DOES Correctional Officer
15 Martin raped JANE ED-34 ROE when he penetrated Plaintiff JANE ED-34
16 ROE’S vagina with his penis.
- 17 iv. Out of fear of retaliation and further confinement, Plaintiff JANE ED-34
18 ROE never reported the sexual misconduct assuming the complaints would
19 be unanswered, dismissed, ignored, and bury without investigation or
20 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
21 ED-34 ROE was systematically and consistently sexually abused in the
22 “safe haven” environment created and controlled by Defendants
23 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 24 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE ED-
25 34 ROE has experienced ongoing and persistent mental, emotional and
26 psychological problems, including, but not limited to: anxiety; depression;
27 feelings of helplessness; insomnia, questioning of sexual identity; lowered
28 self-esteem; moodiness; difficulty in meaningfully interacting with others

1 and intimate relationships; loss of trust and control issues with any persons
2 in a position of authority and trust; loss of trust for and fear of police officers
3 and men; flashbacks and intrusive thoughts; stress; nervousness; fear;
4 embarrassment; shame; and loss of enjoyment of life, among others.

5 ii. **JANE AC-35 ROE:**

6 i. Plaintiff JANE AC-35 ROE is a female, born on 7/22/1993, who was
7 sexually abused in or around 2017 and 2019 when the sexual misconduct
8 alleged herein occurred at CCWF.

9 ii. Plaintiff JANE AC-35 ROE was committed to physical mandatory
10 confinement at CCWF where she encountered DOES Correctional Officer
11 Smith who had unfettered access and control, and used a position of power,
12 trust, and authority to sexually abuse and harass Plaintiff JANE AC-35 ROE
13 under color of authority on behalf of Defendants CALIFORNIA and
14 CDCR, THE ABUSERS, DOES, and each of them.

15 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
16 means that would justify the sexual misconduct, DOES Correctional Officer
17 Smith abused Plaintiff JANE AC-35 ROE in between the cells in early
18 mornings. During this time, DOES Correctional Officer Smith secluded
19 Plaintiff JANE AC-35 ROE on two (2) occasions and groped Plaintiff
20 JANE AC-35 ROE'S vagina and chest.

21 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AC-35
22 ROE never reported the sexual misconduct assuming the complaints would
23 be unanswered, dismissed, ignored, and bury without investigation or
24 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
25 AC-35 ROE was systematically and consistently sexually abused in the
26 "safe haven" environment created and controlled by Defendants
27 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AC-
2 35 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity and no
5 longer being attracted to the opposite sex; lowered self-esteem; moodiness;
6 difficulty in meaningfully interacting with others and intimate relationships;
7 loss of trust and control issues with any persons in a position of authority
8 and trust; loss of trust for and fear of police officers and men; flashbacks
9 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
10 and loss of enjoyment of life, among others.

11 jj. **JANE MT-36 ROE:**

- 12 i. Plaintiff JANE MT-36 ROE is a female, born on 1/28/1978, who was
13 sexually abused in or around 2014 and 2011 when the sexual misconduct
14 alleged herein occurred at CCWF.
- 15 ii. Plaintiff JANE MT-36 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered DOES Correctional Officer
17 Davis and DOES Plant Operations Manager Joe, an electrician, who had
18 unfettered access and control, and used a position of power, trust, and
19 authority to sexually abuse and harass Plaintiff JANE MT-36 ROE under
20 color of authority on behalf of Defendants CALIFORNIA and CDCR, THE
21 ABUSERS, DOES, and each of them.
- 22 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
23 means that would justify the sexual misconduct, while Plaintiff JANE MT-
24 36 ROE was taking out the trash, DOES Correctional Officer Davis
25 approached Plaintiff JANE MT-36 ROE and brushed up on her body. DOES
26 Correctional Officer Davis then forced Plaintiff JANE MT-36 ROE to put
27 Plaintiff JANE MT-36 ROE'S hands down his pants to rub his penis. DOES
28 Correctional Officer Davis wanted Plaintiff JANE MT-36 ROE to perform

1 oral copulation on him, but Plaintiff JANE MT-36 ROE was too scared and
2 did not want to engage. DOES Correctional Officer Davis encouraged
3 Plaintiff JANE MT-36 ROE to fondle his erect penis. DOES Correctional
4 Officer Davis tried to groom Plaintiff JANE MT-36 ROE by providing
5 favors such as bringing Plaintiff JANE MT-36 ROE tobacco. Further, while
6 Plaintiff JANE MT-36 ROE was a floater on the yard, DOES Correctional
7 Davis asked for Plaintiff JANE MT-36 ROE while she was on the yard.
8 DOES Correctional Officer Davis then searched the client for no reason and
9 groped Plaintiff JANE MT-36 ROE. DOES Correctional Officer Davis
10 lifted up Plaintiff JANE MT-36 ROE'S shirt and started rubbing her breasts
11 in front of everyone present, including other inmates and officers.
12 Furthermore, absent any legal authority, reasonable suspicion, probable
13 cause, or other means that would justify the sexual misconduct, Plant
14 operations Manager and electrician, Joe, provided JANE MT-36 ROE with
15 tobacco in exchange for sexual favors. Joe said he would give JANE MT-
16 36 ROE tobacco in exchange for a "hand job." Plaintiff JANE MT-36 ROE
17 was then forced to masturbate Joe until Joe ejaculated. After JANE MT-36
18 ROE refused to perform oral sexual acts on Joe, Joe fired JANE MT-36
19 ROE from the job.

20 iv. Out of fear of retaliation and further confinement, Plaintiff JANE MT-36
21 ROE never reported the sexual misconduct assuming the complaints would
22 be unanswered, dismissed, ignored, and bury without investigation or
23 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
24 MT-36 ROE was systematically and consistently sexually abused in the
25 "safe haven" environment created and controlled by Defendants
26 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

27 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE MT-
28 36 ROE has experienced ongoing and persistent mental, emotional and

1 psychological problems, including, but not limited to: anxiety; depression;
2 feelings of helplessness; insomnia, questioning of sexual identity; lowered
3 self-esteem; moodiness; difficulty in meaningfully interacting with others
4 and intimate relationships; loss of trust and control issues with any persons
5 in a position of authority and trust; loss of trust for and fear of police officers
6 and men; flashbacks and intrusive thoughts; stress; nervousness; fear;
7 embarrassment; shame; and loss of enjoyment of life, among others.

8 **kk. JANE AC-37 ROE:**

- 9 i. Plaintiff JANE AC-37 ROE is a female, born on 2/13/1989, who was
10 sexually abused in or around 2015 when the sexual misconduct alleged
11 herein occurred at CIW and CCWF.
- 12 ii. Plaintiff JANE AC-37 ROE was committed to physical mandatory
13 confinement at CIW where she encountered DOES Correctional Officer
14 Martinez and at CCWF where she encountered DOES Sergeant Navarro
15 who had unfettered access and control, and used a position of power, trust,
16 and authority to sexually abuse and harass Plaintiff JANE AC-37 ROE
17 under color of authority on behalf of Defendants CALIFORNIA and
18 CDCR, THE ABUSERS, DOES, and each of them.
- 19 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
20 means that would justify the sexual misconduct, at CIW, DOES
21 Correctional Officer Martinez released Plaintiff JANE AC-37 ROE from
22 her cell by clicking her door as a signal for her to come out. Then, DOES
23 Correctional Officer Martinez took Plaintiff JANE AC-37 ROE to a supply
24 closet where he kissed Plaintiff JANE AC-37 ROE and fondled her breasts
25 and vagina, skin-to-skin. DOES Correctional Officer Martinez then
26 digitally penetrated Plaintiff JANE AC-37 ROE'S vagina. On another
27 occasion, DOES Correctional Officer Martinez put Plaintiff JANE AC-37
28 ROE'S hand down his pants and forced Plaintiff JANE AC-37 ROE to grab

1 his penis to stimulate him. In the interim, DOES Correctional Officer
2 Martinez gave Plaintiff JANE AC-37 ROE favors in exchange for the sexual
3 abuse such as chewing gum as well as advance notice that her cell would be
4 searched, along with phone call before other inmates. Yet DOES
5 Correctional Officer Martinez also threatened Plaintiff JANE AC-37 ROE
6 that if she reported the sexual abuse, he would put her in the Special
7 Housing Unit (“SHU”). At CCWF, DOES Sergeant Navarro flirted with
8 Plaintiff JANE AC-37 ROE and made sexual comments to her. One time,
9 since Plaintiff JANE AC-37 ROE’S roommate had drugs, Plaintiff JANE
10 AC-37 ROE’S entire room was searched. During this time DOES Sergeant
11 Navarro pulled Plaintiff JANE AC-37 ROE to another room, pulled out his
12 baton, and began rubbing Plaintiff JANE AC-37 ROE’S breasts and vagina
13 with the baton like a sex toy. DOES Sergeant Navarro touched Plaintiff
14 JANE AC-37 ROE’S upper thigh but stopped once he heard someone
15 approaching. During other occasions, Plaintiff JANE AC-37 ROE hid while
16 DOES Sergeant Navarro looked for her. Plaintiff JANE AC-37 ROE had a
17 girlfriend, and DOES Sergeant Navarro proceeded to threaten Plaintiff
18 JANE AC-37 ROE with a write-up when he saw them together.

19 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AC-37
20 never reported the sexual misconduct assuming the complaints would be
21 unanswered, dismissed, ignored, and bury without investigation or redress
22 thereby allowing the sexual misconduct to continue. Plaintiff JANE AC-37
23 was systematically and consistently sexually abused in the “safe haven”
24 environment created and controlled by Defendants CALIFORNIA and
25 CDCR, THE ABUSERS, DOES, and each of them.

26 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AC-
27 37 ROE has experienced ongoing and persistent mental, emotional and
28 psychological problems, including, but not limited to: anxiety and post-

1 traumatic stress disorder; depression; feelings of helplessness; insomnia,
2 questioning of sexual identity; lowered self-esteem; moodiness; difficulty
3 in meaningfully interacting with others and intimate relationships; loss of
4 trust and control issues with any persons in a position of authority and trust;
5 loss of trust for and fear of police officers and men; flashbacks and intrusive
6 thoughts; stress; nervousness; fear; embarrassment; shame; and loss of
7 enjoyment of life, among others.

8 **ii. JANE AM-38 ROE:**

- 9 i. Plaintiff JANE AM-38 ROE is a female, born on 7/6/1979, who was
10 sexually abused in or around 2013 to 2019 when the sexual misconduct
11 alleged herein occurred at CCWF.
- 12 ii. Plaintiff JANE AM-38 ROE was committed to physical mandatory
13 confinement at CCWF where she encountered Defendant Israel
14 Correctional Officer Trevino who had unfettered access and control, and
15 used a position of power, trust, and authority to sexually abuse and harass
16 Plaintiff JANE AM-38 ROE under color of authority on behalf of
17 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
18 of them.
- 19 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
20 means that would justify the sexual misconduct, Defendant Correctional
21 Officer Trevino was a roamer at CCWF where he took advantage of
22 Plaintiff JANE AM-38 ROE in known blind spots. On one occasion,
23 Plaintiff JANE AM-38 ROE was filling a mop bucket with water when
24 Defendant Correctional Officer Trevino came over and pulled out his penis
25 from his pants, pulled off Plaintiff JANE AM-38 ROE'S pants, and began
26 to penetrate Plaintiff JANE AM-38 ROE'S vagina with his penis.
27 Defendant Correctional Officer Trevino also tried to "purchase" Plaintiff
28 JANE AM-38 ROE from Plaintiff JANE AM-38 ROE'S girlfriend when

1 Plaintiff JANE AM-38 ROE first arrived at CCWF. This continued to occur
2 on several occasions, and Defendant Correctional Officer Trevino
3 penetrated Plaintiff JANE AM-38 ROE vaginally with his penis more than
4 twenty (20) times.

5 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AM-38
6 ROE never reported the sexual misconduct assuming the complaints would
7 be unanswered, dismissed, ignored, and bury without investigation or
8 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
9 AM-38 ROE was systematically and consistently sexually abused in the
10 “safe haven” environment created and controlled by Defendants
11 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

12 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AM-
13 38 ROE has experienced ongoing and persistent mental, emotional and
14 psychological problems, including, but not limited to: anxiety; depression;
15 feelings of helplessness; insomnia, questioning of sexual identity; lowered
16 self-esteem; moodiness; difficulty in meaningfully interacting with others
17 and intimate relationships; loss of trust and control issues with any persons
18 in a position of authority and trust; loss of trust for and fear of police officers
19 and men; flashbacks and intrusive thoughts; stress; nervousness; fear;
20 embarrassment; shame; and loss of enjoyment of life, among others.

21 mm. **JANE KL-39 ROE:**

22 i. Plaintiff JANE KL-39 ROE is a female, born on 5/22/1962, who was
23 sexually abused in or around 2015 to 2016 when the sexual misconduct
24 alleged herein occurred at CCWF.

25 ii. Plaintiff JANE KL-39 ROE was committed to physical mandatory
26 confinement at CCWF where she encountered Defendant Correctional
27 Officer Fernando Naranjo who had unfettered access and control, and used
28 a position of power, trust, and authority to sexually abuse and harass

1 Plaintiff JANE KL-39 ROE under color of authority on behalf of
2 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
3 of them.

4 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
5 means that would justify the sexual misconduct, while Plaintiff JANE KL-
6 39 ROE was falling behind at work exchange on or about five (5) to (6)
7 occasions, Defendant Correctional Officer Naranjo put his hand down
8 Plaintiff JANE KL-39 ROE'S top and groped her bare breasts.

9 iv. Out of fear of retaliation and further confinement, Plaintiff JANE KL-39
10 ROE never reported the sexual misconduct assuming the complaints would
11 be unanswered, dismissed, ignored, and bury without investigation or
12 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
13 KL-39 ROE was systematically and consistently sexually abused in the
14 "safe haven" environment created and controlled by Defendants
15 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

16 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE KL-
17 39 ROE has experienced ongoing and persistent mental, emotional and
18 psychological problems, including, but not limited to: anxiety; depression;
19 feelings of helplessness; insomnia, questioning of sexual identity; lowered
20 self-esteem; moodiness; difficulty in meaningfully interacting with others
21 and intimate relationships; loss of trust and control issues with any persons
22 in a position of authority and trust; loss of trust for and fear of police officers
23 and men; flashbacks and intrusive thoughts; stress; nervousness; fear;
24 embarrassment; shame; and loss of enjoyment of life, among others.

25 nn. **JANE TP-40 ROE:**

26 i. Plaintiff JANE TP-40 ROE is a female, born on 3/1/1980, who was sexually
27 abused in or around 2014 when the sexual misconduct alleged herein
28 occurred at CCWF.

- 1 ii. Plaintiff JANE TP-40 ROE was committed to physical mandatory
2 confinement at CCWF where she encountered Defendant Correctional
3 Officer Michael Baron who had unfettered access and control, and used a
4 position of power, trust, and authority to sexually abuse and harass Plaintiff
5 JANE TP-40 ROE under color of authority on behalf of Defendants
6 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 7 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
8 means that would justify the sexual misconduct, Defendant Correctional
9 Officer Baron groped Plaintiff JANE TP-40 ROE’S bare breasts over ten
10 (10) times in the CCWF game room or supply closet and forced himself on
11 Plaintiff JANE TP-40 ROE. During these occasions, Defendant
12 Correctional Officer Baron forced himself on JANE TP-40 ROE during
13 which he would kiss Plaintiff JANE TP-40 ROE’S neck before forcing his
14 hands up Plaintiff JANE TP-40 ROE’S shirt to feel her bare breasts.
- 15 iv. Out of fear of retaliation and further confinement, Plaintiff JANE TP-40
16 ROE never reported the sexual misconduct assuming the complaints would
17 be unanswered, dismissed, ignored, and bury without investigation or
18 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
19 TP-40 ROE was systematically and consistently sexually abused in the
20 “safe haven” environment created and controlled by Defendants
21 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 22 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE TP-
23 40 ROE has experienced ongoing and persistent mental, emotional and
24 psychological problems, including, but not limited to: anxiety; depression;
25 feelings of helplessness; insomnia, questioning of sexual identity; lowered
26 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
27 with others and intimate relationships; loss of trust and control issues with
28 any persons in a position of authority and trust; loss of trust for and fear of

1 police officers and men; flashbacks and intrusive thoughts; stress;
2 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
3 among others.

4 oo. **JANE JB-41 ROE:**

- 5 i. Plaintiff JANE JB-41 ROE is a female, born on 7/13/1979, who was
6 sexually abused in or around 2015 when the sexual misconduct alleged
7 herein occurred at CCWF.
- 8 ii. Plaintiff JANE JB-41 ROE was committed to physical mandatory
9 confinement at CCWF where she encountered Defendant Correctional
10 Officer Israel Trevino who had unfettered access and control, and used a
11 position of power, trust, and authority to sexually abuse and harass Plaintiff
12 JANE JB-41 ROE under color of authority on behalf of Defendants
13 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 14 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
15 means that would justify the sexual misconduct, Defendant Correctional
16 Officer Trevino entered Plaintiff JANE JB-41 ROE'S cell at night and told
17 her roommates to leave. Defendant Correctional Officer Trevino then
18 forced Plaintiff JANE JB-41 ROE up against the sink and fondled Plaintiff
19 JANE JB-41 ROE'S bare breasts with his bare hands as he rubbed his penis
20 against Plaintiff JANE JB-41 ROE'S leg.
- 21 iv. Out of fear of retaliation and further confinement, Plaintiff JANE JB-41
22 ROE never reported the sexual misconduct assuming the complaints would
23 be unanswered, dismissed, ignored, and bury without investigation or
24 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
25 JB-41 ROE was systematically and consistently sexually abused in the "safe
26 haven" environment created and controlled by Defendants CALIFORNIA
27 and CDCR, THE ABUSERS, DOES, and each of them.
- 28

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE JB-
2 41 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
6 with others and intimate relationships; loss of trust and control issues with
7 any persons in a position of authority and trust; loss of trust for and fear of
8 police officers and men; flashbacks and intrusive thoughts; stress;
9 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
10 among others.

11 pp. **JANE AS-42 ROE:**

- 12 i. Plaintiff JANE AS-42 ROE is a female, born on 10/17/1976, who was
13 sexually abused in or around 2021 to 2022 when the sexual misconduct
14 alleged herein occurred at CCWF.
- 15 ii. Plaintiff JANE AS-42 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered DOES Correctional Officer
17 Tyra who had unfettered access and control, and used a position of power,
18 trust, and authority to sexually abuse and harass Plaintiff JANE AS-42 ROE
19 under color of authority on behalf of Defendants CALIFORNIA and
20 CDCR, THE ABUSERS, DOES, and each of them.
- 21 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
22 means that would justify the sexual misconduct, DOES Correctional Officer
23 Tyra walked into Plaintiff JANE AS-42 ROE'S room and said, if Plaintiff
24 JANE AS-42 ROE wanted to go home, she must perform oral copulation
25 on him. DOES Correctional Officer Tyra then dropped his pants and
26 aggressively forced Plaintiff JANE AS-42 ROE to perform oral copulation
27 on him as well as swallow his semen. On another occasion, DOES
28 Correctional Officer Tyra took Plaintiff JANE AS-42 ROE to a supply

1 closet room and aggressively forced Plaintiff JANE AS-42 ROE to perform
2 oral copulation on him again. On a third occasion, DOES Correctional
3 Officer Tyra took Plaintiff JANE AS-42 ROE to a supply closet after lunch
4 where he forced Plaintiff JANE AS-42 ROE to perform oral copulation on
5 him once more.

6 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AS-42
7 ROE never reported the sexual misconduct assuming the complaints would
8 be unanswered, dismissed, ignored, and bury without investigation or
9 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
10 AS-42 ROE was systematically and consistently sexually abused in the
11 “safe haven” environment created and controlled by Defendants
12 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

13 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AS-
14 42 ROE has experienced ongoing and persistent mental, emotional and
15 psychological problems, including, but not limited to: anxiety; depression;
16 feelings of helplessness; insomnia, questioning of sexual identity; lowered
17 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
18 with others and intimate relationships; loss of trust and control issues with
19 any persons in a position of authority and trust; loss of trust for and fear of
20 police officers and men; flashbacks and intrusive thoughts; stress;
21 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
22 among others.

23 qq. **JANE LW-43 ROE:**

24 i. Plaintiff JANE LW-43 ROE is a female, born on 7/22/1978, who was
25 sexually abused in or around 2009 to 2011 when the sexual misconduct
26 alleged herein occurred at CCWF.

27 ii. Plaintiff JANE LW-43 ROE was committed to physical mandatory
28 confinement at CCWF where she encountered DOES Correctional Officer

1 Johns who had unfettered access and control, and used a position of power,
2 trust, and authority to sexually abuse and harass Plaintiff JANE LW-43
3 ROE under color of authority on behalf of Defendants CALIFORNIA and
4 CDCR, THE ABUSERS, DOES, and each of them.

5 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
6 means that would justify the sexual misconduct, DOES Correctional Officer
7 Johns was supposed to monitor Plaintiff JANE LW-43 ROE but approached
8 Plaintiff JANE LW-43 ROE, unzipped his own pants, and placed his hand
9 on Plaintiff JANE LW-43 ROE'S shoulder to hold her in place, using the
10 other hand to grab Plaintiff JANE LW-43 ROE by the wrist/forearm, and
11 force Plaintiff JANE LW-43 ROE'S hand onto his bare penis.

12 iv. Out of fear of retaliation and further confinement, Plaintiff JANE LW-43
13 ROE never reported the sexual misconduct assuming the complaints would
14 be unanswered, dismissed, ignored, and bury without investigation or
15 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
16 LW-43 ROE was systematically and consistently sexually abused in the
17 "safe haven" environment created and controlled by Defendants
18 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

19 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE LW-
20 43 ROE has experienced ongoing and persistent mental, emotional and
21 psychological problems, including, but not limited to: anxiety; depression;
22 feelings of helplessness; insomnia, questioning of sexual identity; lowered
23 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
24 with others and intimate relationships; loss of trust and control issues with
25 any persons in a position of authority and trust; loss of trust for and fear of
26 police officers and men; flashbacks and intrusive thoughts; stress;
27 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
28 among others.

1 rr. **JANE KR-44 ROE:**

2 i. Plaintiff JANE KR-44 ROE is a female, born on 10/31/1961, who was
3 sexually abused in or around 2005 to 2017 when the sexual misconduct
4 alleged herein occurred at CCWF.

5 ii. Plaintiff JANE KR-44 ROE was committed to physical mandatory
6 confinement at CCWF where she encountered DOES Correctional Officer
7 Barren who had unfettered access and control, and used a position of power,
8 trust, and authority to sexually abuse and harass Plaintiff JANE KR-44 ROE
9 under color of authority on behalf of Defendants CALIFORNIA and
10 CDCR, THE ABUSERS, DOES, and each of them.

11 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
12 means that would justify the sexual misconduct, DOES Correctional Officer
13 Barren escorted Plaintiff JANE KR-44 ROE from the gym to Plaintiff
14 JANE KR-44 ROE'S unit while she was helping put away chairs in the gym.
15 DOES Correctional Officer Barren then forced Plaintiff JANE 44-ROE to
16 masturbate and perform oral copulation on him. DOES Correctional Officer
17 Barren then forced Plaintiff JANE KR-44 ROE to engage in sexual
18 intercourse with him. The oral copulation and sexual intercourse reoccurred
19 on approximately 14 to 19 more occasions.

20 iv. Out of fear of retaliation and further confinement, Plaintiff JANE KR-44
21 ROE never reported the sexual misconduct assuming the complaints would
22 be unanswered, dismissed, ignored, and bury without investigation or
23 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
24 KR-44 ROE was systematically and consistently sexually abused in the
25 “safe haven” environment created and controlled by Defendants
26 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

27 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE KR-
28 44 ROE has experienced ongoing and persistent mental, emotional and

1 psychological problems, including, but not limited to: anxiety; depression;
2 feelings of helplessness; insomnia, questioning of sexual identity; lowered
3 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
4 with others and intimate relationships; loss of trust and control issues with
5 any persons in a position of authority and trust; loss of trust for and fear of
6 police officers and men; flashbacks and intrusive thoughts; stress;
7 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
8 among others.

9 ss. **JANE MB-45 ROE:**

- 10 i. Plaintiff JANE MB-45 ROE is a female, born on 9/17/1983, who was
11 sexually abused in or around 2004 to 2016 when the sexual misconduct
12 alleged herein occurred at CCWF.
- 13 ii. Plaintiff JANE MB-45 ROE was committed to physical mandatory
14 confinement at CCWF where she encountered Defendant Correctional
15 Officer Gary Turner R. Jr. and Defendant Correctional Officer Corey
16 Sanchez who had unfettered access and control, and used a position of
17 power, trust, and authority to sexually abuse and harass Plaintiff JANE MB-
18 45 ROE under color of authority on behalf of Defendants CALIFORNIA
19 and CDCR, THE ABUSERS, DOES, and each of them.
- 20 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
21 means that would justify the sexual misconduct, Defendant Correctional
22 Officer Gary Turner R. Jr. bent Plaintiff JANE MB-45 ROE over a
23 bathroom sink and raped Plaintiff JANE MB-45 ROE'S vagina with his
24 penis. During other instances of sexual misconduct, Defendant Correctional
25 Officer Gary Turner R. Jr. forced Plaintiff JANE MB-45 ROE to perform
26 oral copulation on him in the game room. The sexual abuse inflicted by
27 Defendant Correctional Officer Gary Turner R. Jr. on Plaintiff JANE MB-
28 45 ROE occurred over twenty times. Additionally, Defendant Correctional

1 Officer Corey Sanchez sexually abused Plaintiff JANE MB-45 ROE nearly
2 the same amount of times. However, during these instances, Defendant
3 Correctional Officer Sanchez took Plaintiff JANE MB-45 ROE into a
4 freezer and forced Plaintiff JANE MB-45 ROE to perform oral copulation
5 on him.

6 iv. Out of fear of retaliation and further confinement, Plaintiff JANE MB-45
7 ROE never reported the sexual misconduct assuming the complaints would
8 be unanswered, dismissed, ignored, and bury without investigation or
9 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
10 MB-45 ROE was systematically and consistently sexually abused in the
11 “safe haven” environment created and controlled by Defendants
12 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

13 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE MB-
14 45 ROE has experienced ongoing and persistent mental, emotional and
15 psychological problems, including, but not limited to: anxiety; depression;
16 feelings of helplessness; insomnia, questioning of sexual identity; lowered
17 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
18 with others and intimate relationships; loss of trust and control issues with
19 any persons in a position of authority and trust; loss of trust for and fear of
20 police officers and men; flashbacks and intrusive thoughts; stress;
21 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
22 among others.

23 tt. **JANE JD-46 ROE:**

24 i. Plaintiff JANE JD-46 ROE is a female, born on 7/6/1973, who was sexually
25 abused in or around 2015 when the sexual misconduct alleged herein
26 occurred at CCWF.

27 ii. Plaintiff JANE JD-46 ROE was committed to physical mandatory
28 confinement at CCWF where she encountered Defendant Correctional

1 Officer Mark Medina and Defendant Correctional Officer Israel Trevino
2 who had unfettered access and control, and used a position of power, trust,
3 and authority to sexually abuse and harass Plaintiff JANE JD-46 ROE under
4 color of authority on behalf of Defendants CALIFORNIA and CDCR, THE
5 ABUSERS, DOES, and each of them.

6 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
7 means that would justify the sexual misconduct, Defendant Correctional
8 Officer Medina instructed Plaintiff JANE JD-46 ROE to show him Plaintiff
9 JANE JD-46 ROE'S breasts in an inmate bathroom if she wanted to be
10 placed in her desired cell. Plaintiff JANE JD-46 ROE complied and
11 Defendant Correctional Officer Medina touched Plaintiff JANE JD-46
12 ROE'S breasts. On another occasion, Defendant Correctional Officer
13 Trevino escorted Plaintiff JANE JD-46 ROE to a medical unit that did not
14 have cameras because it was still under construction. Defendant
15 Correctional Officer Trevino then forced Plaintiff JANE JD-46 ROE to
16 perform oral copulation on him.

17 iv. Out of fear of retaliation and further confinement, Plaintiff JANE JD-46
18 ROE never reported the sexual misconduct assuming the complaints would
19 be unanswered, dismissed, ignored, and bury without investigation or
20 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
21 JD-46 ROE was systematically and consistently sexually abused in the "safe
22 haven" environment created and controlled by Defendants CALIFORNIA
23 and CDCR, THE ABUSERS, DOES, and each of them.

24 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE JD-
25 46 ROE has experienced ongoing and persistent mental, emotional and
26 psychological problems, including, but not limited to: anxiety; depression;
27 feelings of helplessness; insomnia, questioning of sexual identity; lowered
28 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting

1 with others and intimate relationships; loss of trust and control issues with
2 any persons in a position of authority and trust; loss of trust for and fear of
3 police officers and men; flashbacks and intrusive thoughts; stress;
4 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
5 among others.

6 uu. **JANE SA-47 ROE:**

- 7 i. Plaintiff JANE SA-47 ROE is a female, born on 7/20/1992, who was
8 sexually abused in or around 2018 when the sexual misconduct alleged
9 herein occurred at CCWF.
- 10 ii. Plaintiff JANE SA-47 ROE was committed to physical mandatory
11 confinement at CCWF where she encountered Defendant Correctional
12 Officer Robert Hermosillo who had unfettered access and control, and used
13 a position of power, trust, and authority to sexually abuse and harass
14 Plaintiff JANE SA-47 ROE under color of authority on behalf of
15 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
16 of them.
- 17 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
18 means that would justify the sexual misconduct, Defendant Correctional
19 Officer Hermosillo approached JANE SA-47 ROE and made comments
20 about her appearance. Defendant Correctional Officer Hermosillo then
21 fondled JANE SA-47 ROE'S vagina and digitally penetrated JANE SA-47
22 ROE'S vagina. On another occasion, during shower time, Defendant
23 Correctional Officer Hermosillo handcuffed JANE SA-47 ROE and took
24 JANE SA-47 ROE to the shower area. During this time, Defendant
25 Correctional Officer Hermosillo digitally penetrated JANE SA-47 ROE'S
26 vagina again.
- 27 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SA-47
28 ROE never reported the sexual misconduct assuming the complaints would

1 be unanswered, dismissed, ignored, and bury without investigation or
2 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
3 SA-47 ROE was systematically and consistently sexually abused in the
4 “safe haven” environment created and controlled by Defendants
5 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

6 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SA-
7 47 ROE has experienced ongoing and persistent mental, emotional and
8 psychological problems, including, but not limited to: anxiety; depression;
9 feelings of helplessness; insomnia, questioning of sexual identity; lowered
10 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
11 with others and intimate relationships; loss of trust and control issues with
12 any persons in a position of authority and trust; loss of trust for and fear of
13 police officers and men; flashbacks and intrusive thoughts; stress;
14 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
15 among others.

16 vv. **JANE AT-48 ROE:**

- 17 i. Plaintiff JANE AT-48 ROE is a female, born on 4/3/1965, who was sexually
18 abused in or around 2010 to 2012 when the sexual misconduct alleged
19 herein occurred at CCWF.
- 20 ii. Plaintiff JANE AT-48 ROE was committed to physical mandatory
21 confinement at CCWF where she encountered DOES Correctional Officer
22 Martinez who had unfettered access and control, and used a position of
23 power, trust, and authority to sexually abuse and harass Plaintiff JANE AT-
24 48 ROE under color of authority on behalf of Defendants CALIFORNIA
25 and CDCR, THE ABUSERS, DOES, and each of them.
- 26 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
27 means that would justify the sexual misconduct, DOES Correctional Officer
28 Martinez offered Plaintiff JANE AT-48 ROE food as a form of payment for

1 working as his porter. After the initial form of payment (i.e., food), DOES
2 Correctional Officer Martinez separated Plaintiff JANE AT-48 ROE with
3 her girlfriend, Ericka, during her work duty assignment so they could
4 participate in a threesome. During this time, to facilitate the threesome,
5 DOES Correctional Officer Martinez brought them marijuana, tobacco,
6 heroin, and crystal meth. During various threesomes, DOES Correctional
7 Officer Martinez entered Ericka's cell and he, Ericka, and Plaintiff JANE
8 AT-48 ROE penetrated each other's genitals. DOES Correctional Officer
9 Martinez never wore condoms, and instead ejaculated in paper towels. On
10 other occasions, DOES Correctional Officer fondled Plaintiff JANE AT-48
11 ROE'S breasts and slammed her against a wall, pushing her down and
12 penetrating her vagina from behind. Plaintiff JANE AT-48 ROE noticed
13 that DOES Correctional Officer Martinez had a birth mark on his penis area.
14 The sexual abuse occurred over 100 times.

- 15 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AT-48
16 ROE never reported the sexual misconduct assuming the complaints would
17 be unanswered, dismissed, ignored, and bury without investigation or
18 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
19 AT-48 ROE was systematically and consistently sexually abused in the
20 "safe haven" environment created and controlled by Defendants
21 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 22 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AT-
23 48 ROE has experienced ongoing and persistent mental, emotional and
24 psychological problems, including, but not limited to: anxiety; depression;
25 feelings of helplessness; insomnia, questioning of sexual identity; lowered
26 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
27 with others and intimate relationships; loss of trust and control issues with
28 any persons in a position of authority and trust; loss of trust for and fear of

1 police officers and men; flashbacks and intrusive thoughts; stress;
2 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
3 among others.

4 ww. **JANE KG-49 ROE:**

- 5 i. Plaintiff JANE KG-49 ROE is a female, born on 11/22/1982, who was
6 sexually abused in or around 2014 when the sexual misconduct alleged
7 herein occurred at CCWF.
- 8 ii. Plaintiff JANE KG-49 ROE was committed to physical mandatory
9 confinement at CCWF where she encountered Defendant Correctional
10 Officer Sergio Rios who had unfettered access and control, and used a
11 position of power, trust, and authority to sexually abuse and harass Plaintiff
12 JANE KG-49 ROE under color of authority on behalf of Defendants
13 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 14 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
15 means that would justify the sexual misconduct, Defendant Correctional
16 Officer Rios called Plaintiff JANE KG-49 ROE in to perform an entrance
17 interview. At this time, Defendant Correctional Officer Rios asked Plaintiff
18 JANE KG-49 ROE how she felt on drugs, which led to sexual-related
19 questions. Defendant Correctional Officer Rios then pulled out his erect
20 penis and began to masturbate. Correctional Officer Rios thereafter put his
21 bare hand underneath Plaintiff JANE KG-49 ROE's shirt and bra, fondling
22 her breasts. Defendant Correctional Officer Rios also rubbed Plaintiff JANE
23 KG-49 ROE'S bare vagina underneath her underwear.
- 24 iv. Out of fear of retaliation and further confinement, Plaintiff JANE KG-49
25 ROE never reported the sexual misconduct assuming the complaints would
26 be unanswered, dismissed, ignored, and bury without investigation or
27 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
28 KG-49 ROE was systematically and consistently sexually abused in the

1 “safe haven” environment created and controlled by Defendants
2 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 3 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE KG-
4 49 ROE has experienced ongoing and persistent mental, emotional and
5 psychological problems, including, but not limited to: anxiety; depression;
6 feelings of helplessness; insomnia, questioning of sexual identity; lowered
7 self-esteem; moodiness; difficulty in meaningfully interacting with others
8 and intimate relationships; loss of trust and control issues with any persons
9 in a position of authority and trust; loss of trust for and fear of police officers
10 and men; flashbacks and intrusive thoughts; stress; nervousness; fear;
11 embarrassment; shame; and loss of enjoyment of life, among others.

12 **xx. JANE KJ-50 ROE:**

- 13 i. Plaintiff JANE KJ-50 ROE is a female, born on 4/18/1995, who was
14 sexually abused in or around 2014 when the sexual misconduct alleged
15 herein occurred at CCWF.
- 16 ii. Plaintiff JANE KJ-50 ROE was committed to physical mandatory
17 confinement at CCWF where she encountered Defendant Correctional
18 Officer Gregory Rodriguez who had unfettered access and control, and used
19 a position of power, trust, and authority to sexually abuse and harass
20 Plaintiff JANE KJ-50 ROE under color of authority on behalf of Defendants
21 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 22 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
23 means that would justify the sexual misconduct, Defendant Correctional
24 Officer Rodriguez approached Plaintiff JANE KJ-50 ROE while in solitary
25 confinement and demanded that Plaintiff JANE KJ-50 ROE open her
26 mouth. Defendant Correctional Officer Rodriguez proceeded to stick his
27 fingers inside Plaintiff JANE KJ-50 ROE’S mouth. Defendant Correctional
28 Officer Rodriguez then instructed Plaintiff JANE KJ-50 ROE to bend over

1 and, after complying, pulled Plaintiff JANE KJ-50 ROE'S pants and
2 underwear down before sticking his fingers in Plaintiff JANE KJ-50 ROE'S
3 vagina. Defendant Correctional Officer Rodriguez next removed his fingers
4 and then his pants, sticking his penis into Plaintiff JANE KJ-50 ROE'S
5 vagina.

6 iv. Out of fear of retaliation and further confinement, Plaintiff JANE KJ-50
7 ROE never reported the sexual misconduct aside from telling her mother,
8 assuming the complaints would be unanswered, dismissed, ignored, and
9 bury without investigation or redress thereby allowing the sexual
10 misconduct to continue. However, Plaintiff JANE KJ-50 ROE did confide
11 in her mother about the abuse. Plaintiff JANE KJ-50 ROE was
12 systematically and consistently sexually abused in the "safe haven"
13 environment created and controlled by Defendants CALIFORNIA and
14 CDCR, THE ABUSERS, DOES, and each of them.

15 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE KJ-
16 50 ROE has experienced ongoing and persistent mental, emotional and
17 psychological problems, including, but not limited to: anxiety; depression;
18 feelings of helplessness; paranoia; insomnia, questioning of sexual identity;
19 lowered self-esteem; moodiness; drug abuse; difficulty in meaningfully
20 interacting with others and intimate relationships; loss of trust and control
21 issues with any persons in a position of authority and trust; loss of trust for
22 and fear of police officers and men; flashbacks and intrusive thoughts;
23 suicidal ideations; stress; nervousness; fear; embarrassment; shame; and
24 loss of enjoyment of life, among others.

25 yy. **JANE EM-51 ROE:**

26 i. Plaintiff JANE EM-51 ROE is a female, born on 1/28/1966, who was
27 sexually abused in or around 2013 when the sexual misconduct alleged
28 herein occurred at CCWF and CIW.

1 ii. Plaintiff JANE EM-51 ROE was committed to physical mandatory
2 confinement at CCWF where she encountered Defendant Correctional
3 Officer Michael Baron, and various DOES correctional officers at CIW
4 whose names Plaintiff JANE EM-51 ROE cannot recall, who had unfettered
5 access and control, and used a position of power, trust, and authority to
6 sexually abuse and harass Plaintiff JANE EM-51 ROE under color of
7 authority on behalf of Defendants CALIFORNIA and CDCR, THE
8 ABUSERS, DOES, and each of them.

9 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
10 means that would justify the sexual misconduct, Defendant Correctional
11 Officer Baron entered Plaintiff JANE EM-51 ROE'S room while she was
12 alone and in the restroom. When Defendant Correctional Officer Baron
13 came into the restroom, he put his bare hands up Plaintiff JANE EM-51
14 ROE'S shirt and groped her breasts. After Defendant Correctional Officer
15 Baron was done, he told Plaintiff JANE EM-51 ROE that if she said
16 anything, she would be in trouble and he had the authority to do whatever
17 he wanted to her. Another time, Defendant Correctional Officer Baron came
18 and got Plaintiff JANE EM-51 ROE from her room, bringing her to a game
19 room where they sat down together. Defendant Correctional Officer Baron
20 then groped Plaintiff JANE EM-51 ROE, who was wearing shorts at the
21 time without underwear on because she was about to go to sleep. While they
22 were sitting down, Defendant Correctional Officer Baron put his bare hands
23 down her shorts and touched her vagina, which made her jump up from her
24 seat in shock. At the time, Defendant Correctional Officer Baron looked
25 like he had been drinking, and he smelled like alcohol. Plaintiff JANE EM-
26 51 ROE then asked Defendant Correctional Officer Baron very loudly,
27 "What are you doing?" and kept her volume the same as she fought back a
28 little bit. Defendant Correctional Officer Baron told Plaintiff JANE EM-51

1 ROE to go back to her room and he will “check her” again. The next day,
2 Defendant Correctional Officer Baron began with various restrictions such
3 as refusing to permit Plaintiff JANE EM-51 ROE to go outside, and locking
4 her in her cell so she missed dinner. Defendant Correctional Officer Baron
5 told Plaintiff JANE EM-51 ROE, “If you let me have it, I will bring you
6 anything you want”” Defendant Correctional Officer Baron would
7 constantly flirt with Plaintiff JANE EM-51 ROE and say things like, “I
8 know you want it, you know you want it, you know you like it.” Defendant
9 Correctional Officer Baron also spanked Plaintiff JANE EM-51 ROE’S
10 buttocks as she would pass by. Furthermore, at CIW, various DOES
11 correctional officers whose names Plaintiff JANE EM-51 ROE cannot
12 recall made sexual requests directed at her.

13 iv. Out of fear of retaliation and further confinement, Plaintiff JANE EM-51
14 ROE never reported the sexual misconduct assuming the complaints would
15 be unanswered, dismissed, ignored, and bury without investigation or
16 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
17 EM-51 ROE was systematically and consistently sexually abused in the
18 “safe haven” environment created and controlled by Defendants
19 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

20 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE EM-
21 51 ROE has experienced ongoing and persistent mental, emotional and
22 psychological problems, including, but not limited to: post-traumatic stress
23 disorder; anxiety; depression; feelings of helplessness; insomnia,
24 questioning of sexual identity; suicidal ideations; lowered self-esteem;
25 moodiness; drug abuse; difficulty in meaningfully interacting with others
26 and intimate relationships; loss of trust and control issues with any persons
27 in a position of authority and trust; loss of trust for and fear of police officers
28

1 and men; flashbacks and intrusive thoughts; stress; nervousness; fear;
2 embarrassment; shame; and loss of enjoyment of life, among others.

3 **zz. JANE RE-52 ROE:**

4 i. Plaintiff JANE RE-52 ROE is a female, born on 10/30/1980, who was
5 sexually abused in or around 2013 to 2018 when the sexual misconduct
6 alleged herein occurred at CCWF and CIW.

7 ii. Plaintiff JANE RE-52 ROE was committed to physical mandatory
8 confinement at CCWF where she encountered DOES Correctional Officer
9 Johnson and DOES Correctional Officer Guerrero, and various correctional
10 officers at CIW, who had unfettered access and control, and used a position
11 of power, trust, and authority to sexually abuse and harass Plaintiff JANE
12 RE-52 ROE under color of authority on behalf of Defendants
13 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

14 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
15 means that would justify the sexual misconduct, at CCWF, DOES
16 Correctional Officer Guerrero fondled Plaintiff JANE RE-52 ROE'S body
17 and forced her to perform oral copulation on him. DOES Correctional
18 Officer Guerrero also used a baton to touch Plaintiff JANE RE-52 ROE'S
19 vagina. DOES Correctional Officer Johnson further groped Plaintiff JANE
20 RE-52 ROE'S vagina. The abuse at CCWF occurred about three (3) times
21 a week. At CIW, various DOES correctional officers whose names are
22 unknown at this time strip searched Plaintiff JANE RE-52 ROE. During this
23 time, the DOES correctional officers required Plaintiff JANE RE-52 ROE
24 to spread her private parts during the strip searches and proceeded to do it
25 themselves as well. Flashlights were used to look inside Plaintiff JANE RE-
26 52 ROE'S vagina. The abuse at CIW occurred too many times for Plaintiff
27 JANE RE-52 ROE to count.

- 1 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
2 means that would justify the sexual misconduct, DOES Correctional Officer
3 Hernandez threatened to write Plaintiff JANE AH-53 ROE up if she did not
4 comply with sexual acts. While in the shower, DOES Correctional Officer
5 Hernandez touched Plaintiff JANE AH-53 ROE and penetrated Plaintiff
6 JANE AH-53 ROE’S vagina with his bare hands. The abuse occurred for
7 approximately three (3) months and approximately twelve (12) times.
- 8 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AH-53
9 ROE never reported the sexual misconduct assuming the complaints would
10 be unanswered, dismissed, ignored, and bury without investigation or
11 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
12 AH-53 ROE was systematically and consistently sexually abused in the
13 “safe haven” environment created and controlled by Defendants
14 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 15 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AH-
16 53 ROE has experienced ongoing and persistent mental, emotional and
17 psychological problems, including, but not limited to: post-traumatic stress
18 disorder; anxiety; depression; feelings of helplessness; insomnia,
19 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
20 difficulty in meaningfully interacting with others and intimate relationships;
21 loss of trust and control issues with any persons in a position of authority
22 and trust; loss of trust for and fear of police officers and men; flashbacks
23 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
24 and loss of enjoyment of life, among others.

25 bbb. **JANE TT-54 ROE:**

- 26 i. Plaintiff JANE TT-54 ROE is a female, born on 10/23/1975, who was
27 sexually abused in or around 2013 when the sexual misconduct alleged
28 herein occurred at CCWF and CIW.

1 ii. Plaintiff JANE TT-54 ROE was committed to physical mandatory
2 confinement at CCWF where she encountered Defendant Correctional
3 Officer Gregory Rodriguez, DOES Correctional Officer Hernandez, and
4 Defendant Correctional Officer Jaime Padilla who had unfettered access
5 and control, and used a position of power, trust, and authority to sexually
6 abuse and harass Plaintiff JANE TT-54 ROE under color of authority on
7 behalf of Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES,
8 and each of them.

9 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
10 means that would justify the sexual misconduct, at CCWF, Defendant
11 Correctional Officer Rodriguez fondled Plaintiff JANE TT-54 ROE
12 underneath her clothes and sexually penetrated Plaintiff JANE TT-54
13 ROE'S vagina. Further, at CCWF, DOES Correctional Hernandez forced
14 Plaintiff JANE TT-54 ROE to perform oral copulation on him too many
15 times to count. Additionally, at CIW, Plaintiff JANE TT-54 ROE signed
16 into a gym class to exercise. While at the gym, Defendant Correctional
17 Officer Padilla forced Plaintiff JANE TT-54 ROE to perform oral
18 copulation on him and then raped Plaintiff JANE TT-54 ROE with no
19 protection.

20 iv. Out of fear of retaliation and further confinement, Plaintiff JANE TT-54
21 ROE reported the sexual misconduct only to a nurse whose name Plaintiff
22 JANE TT-54 ROE cannot recall. Plaintiff JANE TT-54 otherwise never
23 reported the sexual misconduct assuming the complaints would be
24 unanswered, dismissed, ignored, and bury without investigation or redress
25 thereby allowing the sexual misconduct to continue. Plaintiff JANE TT-54
26 ROE was systematically and consistently sexually abused in the "safe
27 haven" environment created and controlled by Defendants CALIFORNIA
28 and CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE TT-
2 54 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety resulting in
4 anxiety attacks; depression; feelings of helplessness; insomnia, questioning
5 of sexual identity; lowered self-esteem; moodiness; drug abuse; difficulty
6 in meaningfully interacting with others and intimate relationships; loss of
7 trust and control issues with any persons in a position of authority and trust;
8 loss of trust for and fear of police officers and men; flashbacks and intrusive
9 thoughts; stress; nervousness; fear; embarrassment; shame; and loss of
10 enjoyment of life, among others. Further, JANE TT-54 ROE contracted
11 Acquired Immunodeficiency Syndrome (“AIDS”).

12 ccc. **JANE SM-55 ROE:**

- 13 i. Plaintiff JANE SM-55 ROE is a female, born on 4/22/1969, who was
14 sexually abused in or around 2014 when the sexual misconduct alleged
15 herein occurred at CCWF.
- 16 ii. Plaintiff JANE SM-55 ROE was committed to physical mandatory
17 confinement at CCWF where she encountered DOES Correctional Officer
18 Hall who had unfettered access and control, and used a position of power,
19 trust, and authority to sexually abuse and harass Plaintiff JANE SM-55 ROE
20 under color of authority on behalf of Defendants CALIFORNIA and
21 CDCR, THE ABUSERS, DOES, and each of them.
- 22 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
23 means that would justify the sexual misconduct, DOES Correctional Officer
24 Hall took advantage of Plaintiff JANE SM-55 ROE when JANE SM-55
25 ROE spent two to three months in the A yard. During this time, DOES
26 Correctional Officer Hall told Plaintiff JANE SM-55 ROE to “clean” his
27 area, but instead forced Plaintiff JANE SM-55 ROE to perform oral
28 copulation on him while he groped Plaintiff JANE SM-55 ROE’S vagina.

1 This was always skin-to-skin contact. While Plaintiff JANE SM-55 ROE
2 was alone, DOES Correctional officer Hall fondled Plaintiff JANE SM-55
3 ROE’S breasts and felt her body as he bribed Plaintiff JANE SM-55 ROE
4 with extra phone calls. If DOES Correctional Officer Hall believed he was
5 going to get caught for the sexual misconduct, he would tell Plaintiff JANE
6 SM-55 ROE to clean. Plaintiff JANE SM-55 ROE witnessed DOES
7 Correctional Officer Hall tell other inmates to “clean” his area as he
8 proceeded to sexually abuse them as well.

9 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SM-55
10 ROE never reported the sexual misconduct assuming the complaints would
11 be unanswered, dismissed, ignored, and bury without investigation or
12 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
13 SM-55 ROE constantly received threats from peers such as, “You are going
14 to the hole,” “you are going to lose your days,” “who is going to believe
15 you,” and “no one is going to believe you.” Plaintiff JANE SM-55 ROE was
16 systematically and consistently sexually abused in the “safe haven”
17 environment created and controlled by Defendants CALIFORNIA and
18 CDCR, THE ABUSERS, DOES, and each of them.

19 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SM-
20 55 ROE E has experienced ongoing and persistent mental, emotional and
21 psychological problems, including, but not limited to: anxiety and post-
22 traumatic stress disorder; difficulty eating; depression; feelings of
23 helplessness; insomnia, questioning of sexual identity; lowered self-esteem;
24 moodiness; drug abuse; difficulty in meaningfully interacting with others
25 and intimate relationships; loss of trust and control issues with any persons
26 in a position of authority and trust; loss of trust for and fear of police officers
27 and men; flashbacks and intrusive thoughts; stress; nervousness; fear;
28 embarrassment; shame; and loss of enjoyment of life, among others.

1 ddd. **JANE CB-56 ROE:**

2 i. Plaintiff JANE CB-56 ROE is a female, born on 12/10/1974, who was
3 sexually abused in or around 2014 when the sexual misconduct alleged
4 herein occurred at CCWF.

5 ii. Plaintiff JANE CB-56 ROE was committed to physical mandatory
6 confinement at CCWF where she encountered DOES Correctional Officer
7 Nelson who had unfettered access and control, and used a position of power,
8 trust, and authority to sexually abuse and harass Plaintiff JANE CB-56 ROE
9 under color of authority on behalf of Defendants CALIFORNIA and
10 CDCR, THE ABUSERS, DOES, and each of them.

11 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
12 means that would justify the sexual misconduct, DOES Correctional Officer
13 Nelson secluded Plaintiff JANE CB-56 ROE and spanked Plaintiff JANE
14 CB-56 ROE'S buttocks. DOES Correctional Officer Nelson then rubbed
15 Plaintiff JANE CB-56 ROE'S vagina and groped her breasts. Because
16 Plaintiff JANE CB-56 ROE did not run away, DOES Correctional Officer
17 Nelson undressed Plaintiff JANE CB-56 ROE and forced oral copulation
18 on Plaintiff JANE CB-56 ROE'S vagina as he groped her breasts. DOES
19 Correctional Officer Nelson would not let Plaintiff JANE CB-56 ROE leave
20 until he finished masturbating in front of Plaintiff JANE CB-56 ROE.
21 DOES Correctional Officer Nelson gave Plaintiff JANE CB-56 ROE extra
22 plates of food, items from the store, and threatened her with more time if
23 she reported the sexual misconduct to anyone.

24 iv. Out of fear of retaliation and further confinement, Plaintiff JANE CB-56
25 ROE never reported the sexual misconduct assuming the complaints would
26 be unanswered, dismissed, ignored, and bury without investigation or
27 redress thereby allowing the sexual misconduct to continue. DOES
28 Correctional Officer Nelson threatened Plaintiff JANE CB-56 ROE with

1 extra time at CCWF. Plaintiff JANE CB-56 ROE was systematically and
2 consistently sexually abused in the “safe haven” environment created and
3 controlled by Defendants CALIFORNIA and CDCR, THE ABUSERS,
4 DOES, and each of them.

- 5 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE CB-
6 56 ROE has experienced ongoing and persistent mental, emotional and
7 psychological problems, including, but not limited to: anxiety and post-
8 traumatic stress disorder; depression; feelings of helplessness; insomnia,
9 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
10 difficulty in meaningfully interacting with others and intimate relationships;
11 loss of trust and control issues with any persons in a position of authority
12 and trust; loss of trust for and fear of police officers and men; flashbacks
13 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
14 and loss of enjoyment of life, among others.

15 eee. **JANE AL-57 ROE:**

- 16 i. Plaintiff JANE AL-57 ROE is a female, born on 4/27/1989, who was
17 sexually abused in or around 2013 when the sexual misconduct alleged
18 herein occurred at CCWF.
- 19 ii. Plaintiff JANE AL-57 ROE was committed to physical mandatory
20 confinement at CCWF where she encountered Defendant Correctional
21 Officer Fernando Garcia who had unfettered access and control, and used a
22 position of power, trust, and authority to sexually abuse and harass Plaintiff
23 JANE AL-57 ROE under color of authority on behalf of Defendants
24 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 25 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
26 means that would justify the sexual misconduct, Defendant Correctional
27 Officer Garcia entered Plaintiff JANE AL-57 ROE’S cell around bedtime
28 to see her before she was relocated from CCWF. At this time, Defendant

1 Correctional Officer Garcia took Plaintiff JANE AL-57 ROE from her cell
2 and into a game room where he began to hug and kiss Plaintiff JANE AL-
3 57 ROE. Defendant Correctional Officer Garcia then began to disrobe
4 Plaintiff JANE AL-57 ROE and fondle her genitals and breasts, skin-to-
5 skin. Defendant Correctional Officer Garcia next sexually penetrated
6 Plaintiff JANE AL-57 ROE, inserting his penis into Plaintiff JANE AL-57
7 ROE'S vagina.

8 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AL-57
9 ROE never reported the sexual misconduct assuming the complaints would
10 be unanswered, dismissed, ignored, and bury without investigation or
11 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
12 AL-57 ROE was systematically and consistently sexually abused in the
13 "safe haven" environment created and controlled by Defendants
14 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

15 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AL-
16 57 ROE has experienced ongoing and persistent mental, emotional and
17 psychological problems, including, but not limited to: anxiety and post-
18 traumatic stress disorder; depression; feelings of helplessness; insomnia,
19 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
20 difficulty in meaningfully interacting with others and intimate relationships;
21 loss of trust and control issues with any persons in a position of authority
22 and trust; loss of trust for and fear of police officers and men; flashbacks
23 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
24 and loss of enjoyment of life, among others.

25 **fff. JANE VP-58 ROE:**

26 i. Plaintiff JANE VP-58 ROE is a female, born on 8/9/1967, who was sexually
27 abused in or around 2014 to 2015 when the sexual misconduct alleged
28 herein occurred at CCWF.

- 1 ii. Plaintiff JANE VP-58 ROE was committed to physical mandatory
2 confinement at CCWF where she encountered DOES Correctional Officer
3 Hernandez or DOES Correctional Officer Alvarez who had unfettered
4 access and control, and used a position of power, trust, and authority to
5 sexually abuse and harass Plaintiff JANE VP-58 ROE under color of
6 authority on behalf of Defendants CALIFORNIA and CDCR, THE
7 ABUSERS, DOES, and each of them.
- 8 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
9 means that would justify the sexual misconduct, DOES Correctional Officer
10 Hernandez or Alvarez groped Plaintiff JANE VP-58 ROE during a clean-
11 up period when Plaintiff JANE VP-58 ROE had agreed to clean up cells to
12 get phone calls in exchange. During this time, DOES Correctional Officer
13 Hernandez or Alvarez groped Plaintiff JANE VP-58 ROE’S buttocks and
14 breasts twice, pinching her nipples, as he fondled her.
- 15 iv. Out of fear of retaliation and further confinement, Plaintiff JANE VP-58
16 ROE never reported the sexual misconduct assuming the complaints would
17 be unanswered, dismissed, ignored, and bury without investigation or
18 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
19 VP-58 ROE was systematically and consistently sexually abused in the
20 “safe haven” environment created and controlled by Defendants
21 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 22 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE VP-
23 58 ROE has experienced ongoing and persistent mental, emotional and
24 psychological problems, including, but not limited to: anxiety and panic
25 attacks; depression; feelings of helplessness; insomnia, questioning of
26 sexual identity; lowered self-esteem; moodiness; drug abuse; difficulty in
27 meaningfully interacting with others and intimate relationships; loss of trust
28 and control issues with any persons in a position of authority and trust; loss

1 of trust for and fear of police officers and men; flashbacks and intrusive
2 thoughts; stress; nervousness; fear; embarrassment; shame; and loss of
3 enjoyment of life, among others.

4 ggg. **JANE DK-59 ROE:**

- 5 i. Plaintiff JANE DK-59 ROE is a female, born on 2/14/1987, who was
6 sexually abused in or around 2014 to 2015 when the sexual misconduct
7 alleged herein occurred at CCWF.
- 8 ii. Plaintiff JANE DK-59 ROE was committed to physical mandatory
9 confinement at CCWF where she encountered DOES Correctional Officer
10 Flores who had unfettered access and control, and used a position of power,
11 trust, and authority to sexually abuse and harass Plaintiff JANE DK-59 ROE
12 under color of authority on behalf of Defendants CALIFORNIA and
13 CDCR, THE ABUSERS, DOES, and each of them.
- 14 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
15 means that would justify the sexual misconduct, DOES Correctional Officer
16 Flores repeatedly abused Plaintiff JANE DK-59 ROE while she was at
17 CCWF. During this time, Correctional Officer Flores called Plaintiff JANE
18 DK-59 ROE and started groping her. Meanwhile, DOES Correctional
19 Officer Flores lifted Plaintiff JANE DK-59 ROE'S shirt and caressed her
20 breasts. Further, Correctional Officer Flores groped Plaintiff JANE DK-59
21 ROE'S buttocks and vagina.
- 22 iv. Out of fear of retaliation and further confinement, Plaintiff JANE DK-59
23 ROE never reported the sexual misconduct assuming the complaints would
24 be unanswered, dismissed, ignored, and bury without investigation or
25 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
26 DK-59 ROE was systematically and consistently sexually abused in the
27 "safe haven" environment created and controlled by Defendants
28 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE DK-
2 59 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
6 with others and intimate relationships; loss of trust and control issues with
7 any persons in a position of authority and trust; loss of trust for and fear of
8 police officers and men; flashbacks and intrusive thoughts; stress;
9 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
10 among others.

11 hhh. **JANE LG-60 ROE:**

- 12 i. Plaintiff JANE LG-60 ROE is a female, born on 7/7/1986, who was sexually
13 abused in or around 2017 when the sexual misconduct alleged herein
14 occurred at CCWF.
- 15 ii. Plaintiff JANE LG-60 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered DOES Doctor Gonzales who
17 had unfettered access and control, and used a position of power, trust, and
18 authority to sexually abuse and harass Plaintiff JANE LG-60 ROE under
19 color of authority on behalf of Defendants CALIFORNIA and CDCR, THE
20 ABUSERS, DOES, and each of them.
- 21 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
22 means that would justify the sexual misconduct, DOES Doctor Gonzales
23 was tasked with examining Plaintiff JANE LG-60 ROE for vaginal
24 discharge but instead proceeded to penetrate Plaintiff JANE LG-60 ROE'S
25 vagina with his fingers. During this time, DOES Doctor Gonzales massaged
26 Plaintiff JANE LG-60 ROE'S clitoris. This abuse occurred on two (2)
27 occasions. DOES Doctor Gonzales also stated in Spanish how beautiful
28 Plaintiff JANE LG-60 ROE'S vagina was.

1 iv. Out of fear of retaliation and further confinement, Plaintiff JANE LG-60
2 ROE never reported the sexual misconduct assuming the complaints would
3 be unanswered, dismissed, ignored, and bury without investigation or
4 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
5 LG-60 ROE was systematically and consistently sexually abused in the
6 “safe haven” environment created and controlled by Defendants
7 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

8 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE LG-
9 60 ROE has experienced ongoing and persistent mental, emotional and
10 psychological problems, including, but not limited to: anxiety; depression;
11 feelings of helplessness; insomnia, questioning of sexual identity; lowered
12 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
13 with others and intimate relationships; loss of trust and control issues with
14 any persons in a position of authority and trust; loss of trust for and fear of
15 police officers and men; flashbacks and intrusive thoughts; stress;
16 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
17 among others.

18 iii. **JANE TC-61 ROE:**

19 i. Plaintiff JANE TC-61 ROE is a female, born on 8/29/1979, who was
20 sexually abused in or around 2016 when the sexual misconduct alleged
21 herein occurred at CCWF.

22 ii. Plaintiff JANE TC-61 ROE was committed to physical mandatory
23 confinement at CCWF where she encountered Defendant Correctional
24 Officer Dustin Brown who had unfettered access and control, and used a
25 position of power, trust, and authority to sexually abuse and harass Plaintiff
26 JANE TC-61 ROE under color of authority on behalf of Defendants
27 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

1 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
2 means that would justify the sexual misconduct, Defendant Correctional
3 Officer Brown called Plaintiff TC-61 ROE into his office on approximately
4 six (6) occasions and rubbed his body against Plaintiff TC-61 ROE’S body
5 including Plaintiff TC-61 ROE’S vagina. Defendant Correctional Officer
6 Brown claimed he was checking Plaintiff TC-61 ROE for contraband.
7 Defendant Correctional Officer Brown then fondled Plaintiff TC-61 ROE’S
8 bare breasts before putting his hands in Plaintiff TC-61 ROE’S pants and
9 digitally penetrating Plaintiff TC-61 ROE’S vagina. Defendant Correctional
10 Officer Brown also pulled out his penis and masturbated until completion.
11 Defendant Correctional Officer Brown threatened Plaintiff TC-61 ROE
12 with more time at CCWF if she reported the sexual abuse, and provided
13 Plaintiff TC-61 ROE with cigarettes, candy, and free phone calls as the
14 sexual abuse continued.

15 iv. Out of fear of retaliation and further confinement, Plaintiff JANE TC-61
16 ROE never reported the sexual misconduct assuming the complaints would
17 be unanswered, dismissed, ignored, and bury without investigation or
18 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
19 TC-61 ROE was systematically and consistently sexually abused in the
20 “safe haven” environment created and controlled by Defendants
21 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

22 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE TC-
23 61 ROE has experienced ongoing and persistent mental, emotional and
24 psychological problems, including, but not limited to: anxiety; depression;
25 feelings of helplessness; insomnia, questioning of sexual identity; lowered
26 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
27 with others and intimate relationships; loss of trust and control issues with
28 any persons in a position of authority and trust; loss of trust for and fear of

1 police officers and men; flashbacks and intrusive thoughts; stress;
2 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
3 among others.

4 **jjj. JANE SB-62 ROE:**

- 5 i. Plaintiff JANE SB-62 ROE is a female, born on 1/26/1976, who was
6 sexually abused in or around 2015 or 2016 when the sexual misconduct
7 alleged herein occurred at CCWF.
- 8 ii. Plaintiff JANE SB-62 ROE was committed to physical mandatory
9 confinement at CCWF where she encountered Defendant Correctional
10 Officer Joey Solorio who had unfettered access and control, and used a
11 position of power, trust, and authority to sexually abuse and harass Plaintiff
12 JANE SB-62 ROE under color of authority on behalf of Defendants
13 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 14 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
15 means that would justify the sexual misconduct, Defendant Correctional
16 Officer Solorio called Plaintiff JANE SB-62 ROE for what he called “help
17 in the supply closet.” When Plaintiff JANE SB-62 ROE entered the supply
18 closet, Defendant Correctional Officer Solorio closed the door and pushed
19 Plaintiff JANE SB-62 ROE to her knees. At the time, Defendant
20 Correctional Officer Solorio was standing up with his pants unzipped before
21 he forced Plaintiff JANE SB-62 ROE to perform oral copulation on him and
22 then forced Plaintiff JANE SB-62 ROE to kiss him. On another occasion,
23 again the supply closet, Defendant Correctional Officer Solorio tried to rape
24 Plaintiff JANE SB-62 ROE by pulling Plaintiff JANE SB-62 ROE’S pants
25 down and bending her over, intending to insert his penis into Plaintiff JANE
26 SB-62 ROE’S vagine. Due to noise outside, however, Defendant
27 Correctional Officer Solorio’s penis did not stay erect and he could not
28 continue the sexual abuse.

1 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SB-62
2 ROE never reported the sexual misconduct assuming the complaints would
3 be unanswered, dismissed, ignored, and bury without investigation or
4 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
5 SB-62 ROE was systematically and consistently sexually abused in the
6 “safe haven” environment created and controlled by Defendants
7 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

8 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SB-
9 62 ROE has experienced ongoing and persistent mental, emotional and
10 psychological problems, including, but not limited to: anxiety and post-
11 traumatic stress disorder; depression; feelings of helplessness; insomnia,
12 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
13 difficulty in meaningfully interacting with others and intimate relationships;
14 loss of trust and control issues with any persons in a position of authority
15 and trust; loss of trust for and fear of police officers and men; flashbacks
16 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
17 and loss of enjoyment of life, among others.

18 kkk. **JANE GE-63 ROE:**

19 i. Plaintiff JANE GE-63 ROE is a female, born on 5/10/1989, who was
20 sexually abused in or around 2016 when the sexual misconduct alleged
21 herein occurred at CCWF.

22 ii. Plaintiff JANE GE-63 ROE was committed to physical mandatory
23 confinement at CCWF where she encountered DOES Doctor Gonzalez who
24 had unfettered access and control, and used a position of power, trust, and
25 authority to sexually abuse and harass Plaintiff JANE GE-63 ROE under
26 color of authority on behalf of Defendants CALIFORNIA and CDCR, THE
27 ABUSERS, DOES, and each of them.

1 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
2 means that would justify the sexual misconduct, Plaintiff JANE GE-63
3 ROE presented to DOES Doctor Gonzalez for a spider bite that required
4 medical attention. This initial visit with DOES Doctor Gonzalez was the
5 start of him harassing Plaintiff JANE GE-63 ROE and requiring that she
6 present to the medical office almost daily. DOES Doctor Gonzalez called
7 Plaintiff JANE GE-63 ROE to the medical office and touched her breasts
8 without gloves. DOES Doctor Gonzalez also reached into Plaintiff JANE
9 GE-63 ROE’S pants without gloves and touched Plaintiff JANE GE-63
10 ROE’S vagina as Plaintiff JANE GE-63 ROE tried to resist the sexual abuse
11 by crossing her legs. On another occasion, DOES Doctor Gonzalez called
12 Plaintiff JANE GE-63 ROE into the medical office where he pulled Plaintiff
13 JANE GE-63 ROE’s pants down and laid Plaintiff JANE GE-63 ROE on a
14 small table where he raped Plaintiff JANE GE-63 ROE with his penis.
15 Plaintiff JANE GE-63 ROE tried to resist but the sexual abuse only
16 continued.

17 iv. Out of fear of retaliation and further confinement, Plaintiff JANE GE-63
18 ROE never reported the sexual misconduct assuming the complaints would
19 be unanswered, dismissed, ignored, and bury without investigation or
20 redress thereby allowing the sexual misconduct to continue. However,
21 Plaintiff JANE GE-63 ROE’S cellmate, Yesenia whose last name is
22 unknown at this time, noticed that DOES Doctor Gonzalez would
23 constantly call Plaintiff JANE GE-63 ROE to the medical office.
24 Meanwhile, Plaintiff JANE GE-63 ROE was systematically and
25 consistently sexually abused in the “safe haven” environment created and
26 controlled by Defendants CALIFORNIA and CDCR, THE ABUSERS,
27 DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE GE-
2 63 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety and post-
4 traumatic stress disorder; depression; feelings of helplessness; insomnia,
5 questioning of sexual identity; loss of appetite; lowered self-esteem;
6 moodiness; drug abuse; difficulty in meaningfully interacting with others
7 and intimate relationships; loss of trust and control issues with any persons
8 in a position of authority and trust; loss of trust for and fear of police officers
9 and men; flashbacks and intrusive thoughts; stress; nervousness; fear;
10 embarrassment; shame; and loss of enjoyment of life, among others.

11 **III. JANE ML-64 ROE:**

- 12 i. Plaintiff JANE ML-64 ROE is a female, born on 12/21/1973, who was
13 sexually abused in or around 2019 when the sexual misconduct alleged
14 herein occurred at CCWF.
- 15 ii. Plaintiff JANE ML-64 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered DOES Correctional Officer
17 Bernal who had unfettered access and control, and used a position of power,
18 trust, and authority to sexually abuse and harass Plaintiff JANE ML-64
19 ROE under color of authority on behalf of Defendants CALIFORNIA and
20 CDCR, THE ABUSERS, DOES, and each of them.
- 21 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
22 means that would justify the sexual misconduct, DOES Correctional Officer
23 Bernal cornered Plaintiff JANE ML-64 ROE behind a door and forced
24 Plaintiff JANE ML-64 ROE'S hand down his pants making skin-to-skin
25 contact with DOES Correctional Officer Bernal's penis. DOES
26 Correctional Officer Bernal then began fondling JANE ML-64 ROE'S
27 breasts and moved down to Plaintiff JANE ML-64 ROE'S vagina, putting
28 his hands under Plaintiff JANE ML-64 ROE'S clothing and fondling and

1 digitally penetrating Plaintiff JANE ML-64 ROE’S vagina. DOES
2 Correctional Officer Bernal said, “Don’t you want this.” Plaintiff JANE
3 ML-64 ROE replied, “No, I do not want this.” Nevertheless, DOES
4 Correctional Officer Bernal rubbed his own penis and told Plaintiff JANE
5 ML-64 ROE, “You make me so hard.” On another occasion, Plaintiff JANE
6 ML-64 ROE was inside DOES Correctional Officer Bernal’s office to
7 change the trash. While under the desk, DOES Correctional Officer grabbed
8 Plaintiff JANE ML-64 ROE by the back of her head and pushed her head
9 down to his genitals, forcing Plaintiff JANE ML-64 ROE to perform oral
10 copulation on him. Meanwhile, DOES Correctional Officer Bernal asked,
11 “Don’t you want this? You haven’t had it in awhile.” Plaintiff JANE ML-
12 64 ROE replied saying she did not want to engage in his sexual advances.
13 DOES Correctional Officer Bernal then put his hand inside Plaintiff JANE
14 ML-64 ROE’S clothing and fondled her bare vagina with his bare hands.
15 DOES Correctional Officer Bernal gave Plaintiff JANE ML-64 ROE
16 special treatment and lured her to be in isolation with him.

17 iv. Out of fear of retaliation and further confinement, Plaintiff JANE ML-64
18 ROE never reported the sexual misconduct assuming the complaints would
19 be unanswered, dismissed, ignored, and bury without investigation or
20 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
21 ML-64 ROE was systematically and consistently sexually abused in the
22 “safe haven” environment created and controlled by Defendants
23 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

24 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE ML-
25 64 ROE has experienced ongoing and persistent mental, emotional and
26 psychological problems, including, but not limited to: anxiety and post-
27 traumatic stress disorder; depression; feelings of helplessness; insomnia,
28 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;

1 difficulty in meaningfully interacting with others and intimate relationships;
2 loss of trust and control issues with any persons in a position of authority
3 and trust; loss of trust for and fear of police officers and men; flashbacks
4 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
5 and loss of enjoyment of life, among others.

6 mmm. **JANE TH-65 ROE:**

- 7 i. Plaintiff JANE TH-65 ROE is a female, born on 10/6/1984, who was
8 sexually abused in or around 2020 when the sexual misconduct alleged
9 herein occurred at CCWF.
- 10 ii. Plaintiff JANE TH-65 ROE was committed to physical mandatory
11 confinement at CCWF where she encountered DOES Correctional Officer
12 Gomez who had unfettered access and control, and used a position of power,
13 trust, and authority to sexually abuse and harass Plaintiff JANE TH-65 ROE
14 under color of authority on behalf of Defendants CALIFORNIA and
15 CDCR, THE ABUSERS, DOES, and each of them.
- 16 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
17 means that would justify the sexual misconduct, DOES Correctional Officer
18 Gomez took Plaintiff JANE TH-65 ROE out of the shower for a strip search
19 for contraband where he groped her vagina and digitally penetrated her
20 vagina. DOES Correctional Officer Gomez also entered Plaintiff JANE TH-
21 65 ROE'S cell and forced her to undress before groping Plaintiff JANE TH-
22 65 ROE'S vagina and digitally penetrating Plaintiff JANE TH-65 ROE'S
23 vagina. This sexual abuse occurred on approximately six (6) occasions.
24 During this time, DOES Correctional Officer Gomez told Plaintiff JANE
25 TH-65 ROE that no one would believe her if she reported the abuse.
- 26 iv. Out of fear of retaliation and further confinement, Plaintiff JANE TH-65
27 ROE never reported the sexual misconduct assuming the complaints would
28 be unanswered, dismissed, ignored, and bury without investigation or

1 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
2 TH-65 ROE was systematically and consistently sexually abused in the
3 “safe haven” environment created and controlled by Defendants
4 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 5 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE TH-
6 65 ROE has experienced ongoing and persistent mental, emotional and
7 psychological problems, including, but not limited to: anxiety and post-
8 traumatic stress disorder; depression; feelings of helplessness; insomnia,
9 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
10 difficulty in meaningfully interacting with others and intimate relationships;
11 loss of trust and control issues with any persons in a position of authority
12 and trust; loss of trust for and fear of police officers and men; flashbacks
13 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
14 and loss of enjoyment of life, among others.

15 nnn. **JANE GH-66 ROE:**

- 16 i. Plaintiff JANE GH-66 ROE is a female, born on 2/14/1989, who was
17 sexually abused in or around 2020 when the sexual misconduct alleged
18 herein occurred at CCWF.
- 19 ii. Plaintiff JANE GH-66 ROE was committed to physical mandatory
20 confinement at CCWF where she encountered Defendant Correctional
21 Officer Robert Delgado who had unfettered access and control, and used a
22 position of power, trust, and authority to sexually abuse and harass Plaintiff
23 JANE GH-66 ROE under color of authority on behalf of Defendants
24 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 25 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
26 means that would justify the sexual misconduct, Defendant Correctional
27 Officer Delgado approached Plaintiff JANE GH-66 ROE from behind while
28 Plaintiff JANE GH-66 ROE was in the cafeteria grabbing items from a

1 refrigerator. At the time, Defendant Correctional Officer Delgado put his
2 bare hands inside Plaintiff JANE GH-66 ROE'S shirt and underneath her
3 bra, groping Plaintiff JANE GH-66 ROE'S bare breasts. On another
4 occasion, in the same location, Defendant Correctional Officer Delgado
5 approached Plaintiff JANE GH-66 ROE from behind and rubbed his erect
6 penis on Plaintiff JANE GH-66 ROE'S buttocks.

7 iv. Out of fear of retaliation and further confinement, Plaintiff JANE GH-66
8 ROE never reported the sexual misconduct assuming the complaints would
9 be unanswered, dismissed, ignored, and bury without investigation or
10 redress thereby allowing the sexual misconduct to continue. Defendant
11 Correctional Officer Delgado threatened Plaintiff JANE GH-66 ROE with
12 more time at CCWF. Plaintiff JANE GH-66 ROE was systematically and
13 consistently sexually abused in the "safe haven" environment created and
14 controlled by Defendants CALIFORNIA and CDCR, THE ABUSERS,
15 DOES, and each of them.

16 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE GH-
17 66 ROE has experienced ongoing and persistent mental, emotional and
18 psychological problems, including, but not limited to: anxiety; depression;
19 feelings of helplessness; insomnia, questioning of sexual identity; unhealthy
20 relationship with food; lowered self-esteem; moodiness; drug abuse;
21 difficulty in meaningfully interacting with others and intimate relationships;
22 loss of trust and control issues with any persons in a position of authority
23 and trust; loss of trust for and fear of police officers and men; flashbacks
24 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
25 and loss of enjoyment of life, among others.

26 ooo. **JANE DD-67 ROE:**

- 1 i. Plaintiff JANE DD-67 ROE is a female, born on 5/29/1989, who was
2 sexually abused in or around 2017 when the sexual misconduct alleged
3 herein occurred at CCWF.
- 4 ii. Plaintiff JANE DD-67 ROE was committed to physical mandatory
5 confinement at CCWF where she encountered DOES Correctional Officer
6 Negretti and a DOES doctor whose name Plaintiff JANE DD-67 ROE
7 cannot recall, both of whom had unfettered access and control, and used a
8 position of power, trust, and authority to sexually abuse and harass Plaintiff
9 JANE DD-67 ROE under color of authority on behalf of Defendants
10 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 11 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
12 means that would justify the sexual misconduct, DOES Correctional Officer
13 Negretti told Plaintiff JANE DD-67 ROE to go to the cop shop. Plaintiff
14 JANE DD-67 ROE complied. DOES Correctional Officer Negretti then told
15 Plaintiff JANE DD-67 ROE to get on her knees and open her mouth.
16 Plaintiff JANE DD-67 ROE fought back, but DOES Correctional Officer
17 Negretti forced Plaintiff JANE DD-67 ROE to perform oral copulation on
18 him. However, because Plaintiff JANE DD-67 ROE rebelled, DOES
19 Correctional Officer Negretti constantly had Plaintiff JANE DD-67 ROE'S
20 cell searched, destroying Plaintiff JANE DD-67 ROE and Plaintiff JANE
21 DD-67 ROE'S roommates' possessions. Yet Plaintiff JANE DD-67 ROE'S
22 roommates blamed Plaintiff JANE DD-67 ROE and physically attacked
23 Plaintiff JANE DD-67 ROE, causing Plaintiff JANE DD-67 ROE to require
24 medical attention. Thereafter, on a second and third incident of sexual
25 abuse, DOES Correctional Officer Negretti told Plaintiff JANE DD-67
26 ROE to go to the cop shop again. Plaintiff JANE DD-67 ROE complied
27 because she was afraid of her cell getting destroyed daily. During this
28 second occasion, DOES Correctional Officer Negretti forced Plaintiff

1 JANE DD-67 ROE to perform oral copulation on him. Next, during a fourth
2 incident, DOES Correctional Officer Negretti brought Plaintiff JANE DD-
3 67 ROE to the supply closet behind the cop shop demanding that she get
4 inside and stay still. On this occasion, DOES Correctional Officer Plaintiff
5 JANE DD-67 ROE forced Plaintiff JANE DD-67 ROE to bend over, pulled
6 down Plaintiff JANE DD-67 ROE'S pants, and violently raped Plaintiff
7 JANE DD-67 ROE'S vagina with his penis. During a fifth incident, DOES
8 Correctional Officer Negretti brought Plaintiff JANE DD-67 ROE to the
9 supply closet behind the cop shop again where he told Plaintiff JANE DD-
10 67 ROE to get inside and stay still. During this time, DOES Correctional
11 Officer Negretti violently raped Plaintiff JANE DD-67 ROE'S vagina and
12 anus with his penis. Thereafter, during further instances of sexual
13 misconduct bringing the total instances to nine (9), a DOES doctor at CCWF
14 whose name Plaintiff JANE DD-67 ROE cannot recall contacted Plaintiff
15 JANE DD-67 ROE to perform a mammogram. However, the DOES
16 doctor's initial examination was sexual in nature, which only continued
17 during mammograms that he continuously ordered. The abuse worsened
18 with each "mammogram" visit. Eventually, Plaintiff JANE DD-67 ROE
19 fought back to the point that the DOES doctor stopped abusing Plaintiff
20 JANE DD-67 ROE.

21 iv. Plaintiff JANE DD-67 ROE informed a CCWF sergeant about the abuse
22 whose name Plaintiff JANE DD-67 ROE cannot recall. Plaintiff JANE DD-
23 67 ROE was systematically and consistently sexually abused in the "safe
24 haven" environment created and controlled by Defendants CALIFORNIA
25 and CDCR, THE ABUSERS, DOES, and each of them.

26 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE DD-
27 67 ROE has experienced ongoing and persistent mental, emotional and
28 psychological problems, including, but not limited to: anxiety; depression;

1 feelings of helplessness; insomnia, questioning of sexual identity; lowered
2 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
3 with others and intimate relationships; loss of trust and control issues with
4 any persons in a position of authority and trust; loss of trust for and fear of
5 police officers and men; flashbacks and intrusive thoughts; stress;
6 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
7 among others.

8 ppp. **JANE DT-68 ROE:**

- 9 i. Plaintiff JANE DT-68 ROE is a female, born on 7/29/1986, who was
10 sexually abused in or around 2016 to 2017 when the sexual misconduct
11 alleged herein occurred at CCWF and CIW.
- 12 ii. Plaintiff JANE DT-68 ROE was committed to physical mandatory
13 confinement at CCWF and CIW where she encountered Defendant
14 Correctional Officer Gregory Rodriguez at CCWF and DOES Correctional
15 Officer at CIW whose name she cannot recall but possibly Correctional
16 Officer Karl Jones who had unfettered access and control, and used a
17 position of power, trust and authority to sexually abuse and harass Plaintiff
18 JANE DT-68 ROE under color of authority on behalf of Defendants
19 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 20 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
21 means that would justify the sexual misconduct, Defendant Correctional
22 Officer Rodriguez forced Plaintiff JANE DT-68 ROE off the yard and into
23 a janitor's closet at CCWF where she performed oral copulation on him.
24 During this time, Defendant Correctional Officer Rodriguez threatened to
25 throw Plaintiff JANE DT-68 ROE into the Special Housing Unit ("SHU")
26 or extend her prison sentence if she were to tell anyone about the sexual
27 misconduct. The abuse repeated a second occasion in the same location.
28 Thereafter, in the medical wing, where Plaintiff JANE DT-68 ROE

1 remained due to high blood pressure, DOES Correctional Officer Rodriguez
2 entered Plaintiff JANE DT-68 ROE'S hospital cell and put his penis on
3 Plaintiff JANE DT-68 ROE'S forehead. Defendant Correctional Officer
4 Rodriguez then forced Plaintiff JANE DT-68 ROE to perform oral
5 copulation on him and had her wait to leave until Defendant Correctional
6 Officer Rodriguez ejaculated on the floor. Defendant Correctional Officer
7 Rodriguez returned to Plaintiff JANE DT-68 ROE'S hospital cell thereafter
8 wanting more oral copulation, which she was required to perform, and
9 ejaculated on Plaintiff JANE DT-68 ROE'S face. Plaintiff JANE DT-68
10 ROE had been warned that this was commonly required of Defendant
11 Correctional Officer Rodriguez, by fellow inmates, if an inmate were to
12 present for medical attention.

13 iv. Out of fear of retaliation and further confinement, Plaintiff JANE DT-68
14 ROE never reported the sexual misconduct assuming the complaints would
15 be unanswered, dismissed, ignored, and bury without investigation or
16 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
17 DT-68 ROE was systematically and consistently sexually abused in the
18 "safe haven" environment created and controlled by Defendants
19 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
20 Nevertheless, at CIW, Correctional Officer whose last name is possibly
21 Jones went into a janitor's closet with Plaintiff JANE DT-68 ROE was
22 grabbing supplies. The Correctional Officer then grabbed and fondled
23 Plaintiff JANE DT-68 ROE'S breasts and proceeded to put his hand under
24 her shirt, rubbing Plaintiff JANE DT-68 ROE'S vagina as well. The
25 Correctional Officer offered Plaintiff JANE DT-68 ROE special treatment
26 by bringing her candy and cigarettes, constantly flirting with Plaintiff JANE
27 DT-68 ROE as well.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE DT-
2 68 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety and post-
4 traumatic stress disorder; depression; feelings of helplessness; insomnia,
5 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
6 difficulty in meaningfully interacting with others and intimate relationships;
7 loss of trust and control issues with any persons in a position of authority
8 and trust; loss of trust for and fear of police officers and men; flashbacks
9 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
10 and loss of enjoyment of life, among others.

11 qqq. **JANE AG-69 ROE:**

- 12 i. Plaintiff JANE AG-69 ROE is a female, born on 5/8/1982, who was
13 sexually abused in or around 2015 when the sexual misconduct alleged
14 herein occurred at CCWF.
- 15 ii. Plaintiff JANE AG-69 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered DOES Correctional Officer
17 Garcia who had unfettered access and control, and used a position of power,
18 trust, and authority to sexually abuse and harass Plaintiff JANE AG-69
19 ROE under color of authority on behalf of Defendants CALIFORNIA and
20 CDCR, THE ABUSERS, DOES, and each of them.
- 21 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
22 means that would justify the sexual misconduct, DOES Correctional Officer
23 Garcia entered Plaintiff JANE AG-69 ROE'S cell and made sexual
24 comments to her. DOES Correctional Officer Garcia then forced Plaintiff
25 JANE AG-69 ROE remove her clothes and raped Plaintiff JANE AG-69
26 ROE'S vagina with his penis.
- 27 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AG-69
28 ROE never reported the sexual misconduct assuming the complaints would

1 be unanswered, dismissed, ignored, and bury without investigation or
2 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
3 AG-69 ROE was systematically and consistently sexually abused in the
4 “safe haven” environment created and controlled by Defendants
5 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 6 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AG-
7 69 ROE has experienced ongoing and persistent mental, emotional and
8 psychological problems, including, but not limited to: anxiety; depression;
9 feelings of helplessness; insomnia, questioning of sexual identity; lowered
10 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
11 with others and intimate relationships; loss of trust and control issues with
12 any persons in a position of authority and trust; loss of trust for and fear of
13 police officers and men; flashbacks and intrusive thoughts; stress;
14 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
15 among others.

16 **rrr. JANE CM-70 ROE:**

- 17 i. Plaintiff JANE CM-70 ROE is a female, born on 12/30/19980, who was
18 sexually abused in or around 2018 when the sexual misconduct alleged
19 herein occurred at CCWF.
- 20 ii. Plaintiff JANE CM-70 ROE was committed to physical mandatory
21 confinement at CCWF where she encountered Defendant Correctional
22 Officer Steven Reynolds who had unfettered access and control, and used a
23 position of power, trust, and authority to sexually abuse and harass Plaintiff
24 JANE CM-70 ROE under color of authority on behalf of Defendants
25 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 26 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
27 means that would justify the sexual misconduct, Defendant Correctional
28 Officer Reynolds offered Plaintiff JANE CM-70 ROE drugs and tobacco in

1 exchange for sex with him, but Plaintiff JANE CM-70 ROE never accepted
2 the offer. Nevertheless, one day Plaintiff JANE CM-70 ROE was returning
3 from retrieving her medication when Defendant Correctional Officer
4 Reynolds then pushed Plaintiff JANE CM-70 ROE to the ground,
5 handcuffed her, and punched her several times. Plaintiff JANE CM-70
6 ROE'S face was covered in blood. Defendant Correctional Officer
7 Reynolds next stuck his hand under Plaintiff JANE CM-70 ROE'S pants
8 and digitally penetrated Plaintiff JANE CM-70 ROE'S vagina. Defendant
9 Correctional Officer Reynolds then threatened Plaintiff JANE CM-70 ROE,
10 stating that if Plaintiff JANE CM-70 ROE ever told anyone about the sexual
11 misconduct, Plaintiff JANE CM-70 ROE would receive her third strike at
12 CCWF and she would spend her entire life in jail.

13 iv. Out of fear of retaliation and further confinement, Plaintiff JANE CM-70
14 ROE never reported the sexual misconduct assuming the complaints would
15 be unanswered, dismissed, ignored, and bury without investigation or
16 redress thereby allowing the sexual misconduct to continue. However, after
17 CCWF, Plaintiff JANE CM-70 ROE had a panic attack after being detained
18 and transported to the Lexington County Jail in South Carolina. The officers
19 at Lexington County Jail whose names Plaintiff JANE CM-70 cannot recall
20 inquired as to her Plaintiff JANE CM-70 ROE'S reaction, and Plaintiff
21 JANE CM-70 ROE ultimately disclosed the sexual abuse she endured at
22 CCWF. The officers at Lexington County Jail then filed a complaint against
23 Defendant Correctional Officer Steven Reynolds, assuring Plaintiff JANE
24 CM-70 ROE that abuse is not tolerated in jail. Plaintiff JANE CM-70 ROE
25 was systematically and consistently sexually abused in the "safe haven"
26 environment created and controlled by Defendants CALIFORNIA and
27 CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE CM-
2 70 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
6 with others and intimate relationships, as well as maintaining a job; loss of
7 trust and control issues with any persons in a position of authority and trust;
8 loss of trust for and fear of police officers and men; flashbacks and intrusive
9 thoughts; stress; nervousness; fear; embarrassment; shame; and loss of
10 enjoyment of life, among others.

11 sss. **JANE NA-71 ROE:**

- 12 i. Plaintiff JANE NA-71 ROE is a female, born on 2/19/1983, who was
13 sexually abused in or around 2016 when the sexual misconduct alleged
14 herein occurred at CCWF.
- 15 ii. Plaintiff JANE NA-71 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered DOES Correctional Officer
17 Valdez who had unfettered access and control, and used a position of power,
18 trust, and authority to sexually abuse and harass Plaintiff JANE NA-71 ROE
19 under color of authority on behalf of Defendants CALIFORNIA and
20 CDCR, THE ABUSERS, DOES, and each of them.
- 21 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
22 means that would justify the sexual misconduct, DOES Correctional Officer
23 Valdez escorted Plaintiff JANE NA-71 ROE to the laundry room where he
24 opened the laundry mat door for Plaintiff JANE NA-71 ROE to do laundry.
25 DOES Correctional Officer Valdez then made a comment to Plaintiff JANE
26 NA-71, "You look good," before asking Plaintiff JANE NA-71 ROE to
27 bend over. DOES Correctional Officer Valdez next pulled down Plaintiff
28 JANE NA-71 ROE'S basketball shorts and underwear and penetrated

1 Plaintiff JANE NA-71 ROE’S vaina with his penis. DOES Correctional
2 Officer Valdez threatened Plaintiff JANE NA-71 ROE not to tell anyone
3 about the sexual abuse.

4 iv. Out of fear of retaliation and further confinement, Plaintiff JANE NA-71
5 ROE never reported the sexual misconduct assuming the complaints would
6 be unanswered, dismissed, ignored, and bury without investigation or
7 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
8 NA-71 ROE was systematically and consistently sexually abused in the
9 “safe haven” environment created and controlled by Defendants
10 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

11 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE NA-
12 71 ROE has experienced ongoing and persistent mental, emotional and
13 psychological problems, including, but not limited to: anxiety; depression;
14 feelings of helplessness; insomnia, questioning of sexual identity; lowered
15 self-esteem; moodiness; drug abuse causing her to lose custody of her child;
16 difficulty in meaningfully interacting with others and intimate relationships;
17 loss of trust and control issues with any persons in a position of authority
18 and trust; loss of trust for and fear of police officers and men; flashbacks
19 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
20 and loss of enjoyment of life, among others.

21 **ttt. JANE MT-72 ROE:**

22 i. Plaintiff JANE MT-72 ROE is a female, born on 10/12/1965, who was
23 sexually abused in or around 2017 to 2018 when the sexual misconduct
24 alleged herein occurred at CCWF.

25 ii. Plaintiff JANE MT-72 ROE was committed to physical mandatory
26 confinement at CCWF where she encountered DOES Correctional Officer
27 Solorio who had unfettered access and control, and used a position of
28 power, trust, and authority to sexually abuse and harass Plaintiff JANE MT-

1 72 ROE under color of authority on behalf of Defendants CALIFORNIA
2 and CDCR, THE ABUSERS, DOES, and each of them.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, DOES Correctional Officer
5 Solorio began flirting with Plaintiff JANE MT-72 ROE when he would
6 walk to the back of the building inside the clinic where Plaintiff JANE MT-
7 72 ROE was a clerk. Plaintiff JANE MT-72 ROE was always by herself
8 while everyone else was working. DOES Correctional Officer Solorio then
9 began pulling out his penis and requiring Plaintiff JANE MT-72 ROE to
10 perform oral copulation on him, and Plaintiff JANE MT-72 ROE complied
11 since she wanted to maintain her job. Thereafter, DOES Correctional
12 Officer Solorio began covering for Plaintiff JANE MT-72 ROE'S regular
13 officer. During a lockdown, DOES Correctional Officer Solorio was
14 standing behind Plaintiff JANE MT-72 ROE in the clinic as Plaintiff JANE
15 MT-72 ROE noticed him touching his (own) genitals. Plaintiff JANE MT-
16 72 ROE tried to ignore this. However, as Plaintiff JANE MT-72 ROE'S
17 sweatshirt fell from a chair, DOES Correctional Officer Solio asked
18 Plaintiff JANE MT-72 ROE to pick the sweatshirt up and hang it up on his
19 erect penis. Then, DOES Correctional Officer Solorio penetrated Plaintiff
20 JANE MT-72 ROE'S vagina with his penis from behind. Thereafter,
21 Plaintiff JANE MT-72 ROE'S room was searched.

22 iv. Out of fear of retaliation and further confinement, Plaintiff JANE MT-72
23 ROE never reported the sexual misconduct assuming the complaints would
24 be unanswered, dismissed, ignored, and bury without investigation or
25 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
26 MT-72 ROE was systematically and consistently sexually abused in the
27 "safe haven" environment created and controlled by Defendants
28 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE MT-
2 72 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
6 with others and intimate relationships; loss of trust and control issues with
7 any persons in a position of authority and trust; loss of trust for and fear of
8 police officers and men; flashbacks and intrusive thoughts; stress;
9 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
10 among others.

11 uuu. **JANE RB-73 ROE:**

- 12 i. Plaintiff JANE RB-73 ROE is a female, born on 3/27/1991, who was
13 sexually abused in or around 2020 and 2021 when the sexual misconduct
14 alleged herein occurred at CCWF.
- 15 ii. Plaintiff JANE RB-73 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered DOES Correctional Officer
17 Rodriguez and another DOES correctional officer, whose name Plaintiff
18 JANE RB-73 ROE cannot recall, who had unfettered access and control,
19 and used a position of power, trust, and authority to sexually abuse and
20 harass Plaintiff JANE RB-73 ROE under color of authority on behalf of
21 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
22 of them.
- 23 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
24 means that would justify the sexual misconduct, a DOES correctional
25 officer whose name Plaintiff JANE RB-73 ROE cannot recall pulled
26 Plaintiff JANE RB-73 ROE into a utility room while Plaintiff JANE RB-73
27 ROE had a last minute appointment to see a doctor. Plaintiff JANE RB-73
28 ROE'S mouth was covered as the DOES correctional officer fondled

1 Plaintiff JANE RB-73 ROE’S breasts as Plaintiff JANE RB-73 ROE tried
2 to fight him off. On another occasion, DOES Correctional Officer
3 Rodriguez tried to fix a tent in Plaintiff JANE RB-73 ROE’S room that was
4 used to create privacy. However, DOES Correctional Officer Rodriguez
5 tried to put his penis on Plaintiff JANE RB-73 ROE’S face. Plaintiff JANE
6 RB-73 ROE reacted by biting DOES Correctional Officer Rodriguez who
7 proceeded to yell and express body language as if he was going to hit
8 Plaintiff JANE RB-73 ROE. Plaintiff JANE RB-73 ROE then leaned back
9 as DOES Correctional Officer Rodriguez tried to get on top of Plaintiff
10 JANE RB-73 ROE and put his penis in front of Plaintiff JANE RB-73
11 ROE’S face.

12 iv. Out of fear of retaliation and further confinement, Plaintiff JANE RB-73
13 ROE tried to file a grievance concerning the sexual misconduct but assumed
14 the complaints would be unanswered, dismissed, ignored, and bury without
15 investigation or redress thereby allowing the sexual misconduct to continue.
16 The grievance, however, was avoided by CCWF and neve processed.
17 Plaintiff JANE RB-73 ROE still tried to submit two or three grievances with
18 different people including a counselor and a nurse in another department.
19 Plaintiff JANE RB-73 ROE was systematically and consistently sexually
20 abused in the “safe haven” environment created and controlled by
21 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
22 of them.

23 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE RB-
24 73 ROE has experienced ongoing and persistent mental, emotional and
25 psychological problems, including, but not limited to: anxiety and post-
26 traumatic stress disorder; depression; feelings of helplessness; insomnia,
27 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
28 difficulty in meaningfully interacting with others and intimate relationships;

1 loss of trust and control issues with any persons in a position of authority
2 and trust; loss of trust for and fear of police officers and men; flashbacks
3 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
4 and loss of enjoyment of life, among others.

5 vvv. **JANE LA-74 ROE:**

- 6 i. Plaintiff JANE LA-74 ROE is a female, born on 2/5/1972, who was sexually
7 abused in or around 2015 when the sexual misconduct alleged herein
8 occurred at CCWF.
- 9 ii. Plaintiff JANE LA-74 ROE was committed to physical mandatory
10 confinement at CCWF where she encountered Defendant Correctional
11 Officer Gregory Rodriguez who had unfettered access and control, and used
12 a position of power, trust, and authority to sexually abuse and harass
13 Plaintiff JANE LA-74 ROE under color of authority on behalf of
14 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
15 of them.
- 16 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
17 means that would justify the sexual misconduct, Defendant Correctional
18 Officer Rodriguez repeatedly made Plaintiff JANE LA-74 ROE stay back
19 in the “bubble” (i.e., middle unit by the townhall) during inmate count.
20 During each instance, which amounted to approximately sixteen (16) counts
21 of sexual abuse over a four (4) month period, Defendant Correctional
22 Officer Rodriguez sat on a table and made Plaintiff JANE LA-74 ROE get
23 to her knees, forcing Plaintiff JANE LA-74 ROE to perform oral copulation
24 on him.
- 25 iv. Out of fear of retaliation and further confinement, Plaintiff JANE LA-74
26 ROE never reported the sexual misconduct assuming the complaints would
27 be unanswered, dismissed, ignored, and bury without investigation or
28 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE

1 LA-74 ROE was systematically and consistently sexually abused in the
2 “safe haven” environment created and controlled by Defendants
3 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 4 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE LA-
5 74 ROE has experienced ongoing and persistent mental, emotional and
6 psychological problems, including, but not limited to: anxiety; depression;
7 feelings of helplessness; insomnia, questioning of sexual identity; lowered
8 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
9 with others and intimate relationships; loss of trust and control issues with
10 any persons in a position of authority and trust; loss of trust for and fear of
11 police officers and men; flashbacks and intrusive thoughts; stress;
12 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
13 among others.

14 www. **JANE AV-75 ROE:**

- 15 i. Plaintiff JANE AV-75 ROE is a female, born on 3/23/1987, who was
16 sexually abused in or around 2017 when the sexual misconduct alleged
17 herein occurred at CCWF.
- 18 ii. Plaintiff JANE AV-75 ROE was committed to physical mandatory
19 confinement at CCWF where she encountered Defendant Correctional
20 Officer Gregory Rodriguez who had unfettered access and control, and used
21 a position of power, trust, and authority to sexually abuse and harass
22 Plaintiff JANE AV-75 ROE under color of authority on behalf of
23 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
24 of them.
- 25 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
26 means that would justify the sexual misconduct, Defendant Correctional
27 Officer Rodriguez went into the cooler where Plaintiff JANE AV-75 ROE
28 was located with her back to the door, hugging Plaintiff JANE AV-75 ROE

1 from behind. Defendant Correctional Officer Rodriguez then put his hands
2 down Plaintiff JANE AV-75 ROE'S pants and underwear, touching Plaintiff
3 JANE AV-75 ROE'S vagina. Then, Defendant Correctional Officer
4 Rodriguez used an unknown object and tried to penetrate Plaintiff JANE
5 AV-75 ROE'S vagina with the object. However, Plaintiff JANE AV-75
6 ROE managed to escape. Defendant Correctional Officer Rodriguez told
7 Plaintiff JANE AV-75 ROE that no one would believe her if she reported
8 the sexual abuse because she was an inmate. On another occasion, Plaintiff
9 JANE AV-75 ROE was in the dishwashing area with one door used to enter
10 and exit. Meanwhile, Defendant Correctional Officer Rodriguez entered
11 the room and cornered Plaintiff JANE AV-75 ROE before grabbing
12 Plaintiff JANE AV-75 ROE and lifting her. Defendant Correctional Officer
13 Rodriguez then told Plaintiff JANE AV-75 ROE, "The first time was good,
14 but this time I will get you." Defendant Correctional Officer Rodriguez next
15 reached under Plaintiff JANE AV-75 ROE'S pants and underwear, fondling
16 Plaintiff JANE AV-75 ROE'S vagina while kissing Plaintiff JANE AV-75
17 ROE.

18 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AV-75
19 ROE never reported the sexual misconduct assuming the complaints would
20 be unanswered, dismissed, ignored, and bury without investigation or
21 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
22 AV-75 ROE was systematically and consistently sexually abused in the
23 "safe haven" environment created and controlled by Defendants
24 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

25 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AV-
26 75 ROE has experienced ongoing and persistent mental, emotional and
27 psychological problems, including, but not limited to: anxiety and post-
28 traumatic stress disorder; depression; feelings of helplessness; insomnia,

1 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
2 difficulty in meaningfully interacting with others and intimate relationships;
3 loss of trust and control issues with any persons in a position of authority
4 and trust; loss of trust for and fear of police officers and men; flashbacks
5 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
6 and loss of enjoyment of life, among others.

7 xxx. **JANE CB-76 ROE:**

- 8 i. Plaintiff JANE CB-76 ROE is a female, born on 12/16/1994, who was
9 sexually abused in or around 2018 when the sexual misconduct alleged
10 herein occurred at CCWF.
- 11 ii. Plaintiff JANE CB-76 ROE was committed to physical mandatory
12 confinement at CCWF where she encountered Defendant Correctional
13 Officer Gregory Rodriguez who had unfettered access and control, and used
14 a position of power, trust, and authority to sexually abuse and harass
15 Plaintiff JANE CB-76 ROE under color of authority on behalf of
16 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
17 of them.
- 18 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
19 means that would justify the sexual misconduct, Defendant Correctional
20 Officer Rodriguez pulled Plaintiff JANE CB-76 ROE'S pants down and
21 then put his hands down Plaintiff JANE CB-76 ROE'S pants, fondling
22 Plaintiff JANE CB-76 ROE'S vagina and buttocks. This sexual abuse
23 occurred three (3) times, once behind the portal restrooms, once on the side
24 of the 501/502 building, and once in the housing unit where there was a
25 blind spot.
- 26 iv. Out of fear of retaliation and further confinement, Plaintiff JANE CB-76
27 ROE never reported the sexual misconduct assuming the complaints would
28 be unanswered, dismissed, ignored, and bury without investigation or

1 redress thereby allowing the sexual misconduct to continue. Defendant
2 Correctional Officer Rodriguez also threatened to make Plaintiff JANE CB-
3 76 ROE'S life "hell" at CCWF. Plaintiff JANE CB-76 ROE was
4 systematically and consistently sexually abused in the "safe haven"
5 environment created and controlled by Defendants CALIFORNIA and
6 CDCR, THE ABUSERS, DOES, and each of them.

- 7 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE CB-
8 76 ROE has experienced ongoing and persistent mental, emotional and
9 psychological problems, including, but not limited to: anxiety and post-
10 traumatic stress disorder; depression; feelings of helplessness; insomnia,
11 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
12 difficulty in meaningfully interacting with others and intimate relationships;
13 loss of trust and control issues with any persons in a position of authority
14 and trust; loss of trust for and fear of police officers and men; flashbacks
15 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
16 and loss of enjoyment of life, among others.

17 yyy. **JANE BO-77 ROE:**

- 18 i. Plaintiff JANE BO-77 ROE is a female, born on 4/24/1987, who was
19 sexually abused in or around 2013 or 2014 when the sexual misconduct
20 alleged herein occurred at CIW.
- 21 ii. Plaintiff JANE BO-77 ROE was committed to physical mandatory
22 confinement at CIW where she encountered Defendant Correctional Officer
23 Sean Brown who had unfettered access and control, and used a position of
24 power, trust, and authority to sexually abuse and harass Plaintiff JANE BO-
25 77 ROE under color of authority on behalf of Defendants CALIFORNIA
26 and CDCR, THE ABUSERS, DOES, and each of them.
- 27 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
28 means that would justify the sexual misconduct, Defendant Correctional

1 Officer Brown told Plaintiff JANE BO-77 ROE to follow him after a count
2 when everyone was in their respective cell. Plaintiff JANE BO-77 ROE
3 asked Defendant Correctional Officer Brown where he was taking Plaintiff
4 JANE BO-77 ROE but he told Plaintiff JANE BO-77 ROE to be quiet and
5 follow him. In between the A and B side, there was a mutipurpose room that
6 connected both units. Defendant Correctional Officer Brown walked
7 Plaintiff JANE BO-77 ROE into this area where it was dark and pushed
8 Plaintiff JANE BO-77 ROE onto a table, telling Plaintiff JANE BO-77 ROE
9 to be quiet. Plaintiff JANE BO-77 ROE began yelling, screaming that she
10 wanted to return to her cell. Meanwhile, Defendant Correctional Officer
11 Brown pulled his pants down after removing his belt, and then held Plaintiff
12 JANE BO-77 ROE'S arms down. Defendant Correctional Officer Brown
13 reminded Plaintiff JANE BO-77 ROE to be quiet or he would throw
14 Plaintiff JANE BO-77 ROE in solitary confinement. Then, Defendant
15 Correctional Officer Brown continued pushing Plaintiff JANE BO-77 ROE
16 on the table and penetrated Plaintiff JANE BO-77 ROE'S vagina with his
17 penis. Plaintiff JANE BO-77 ROE began crying so Defendant Correctional
18 Officer Brown pushed Plaintiff JANE BO-77 ROE off and told Plaintiff
19 JANE BO-77 ROE to get on her knees, putting his penis in Plaintiff JANE
20 BO-77 ROE'S face and forcing Plaintiff JANE BO-77 ROE to perform oral
21 copulation on him. When the sexual abuse ended, which had lasted 20-30
22 minutes, Plaintiff JANE BO-77 ROE left the room. Defendant Correctional
23 Officer Brown next made Plaintiff JANE BO-77 ROE shower and wash
24 Plaintiff JANE BO-77 ROE'S vagina, which she did as he watched Plaintiff
25 JANE BO-77 ROE bathe herself. On another occasions, Defendant
26 Correctional Officer Brown pushed Plaintiff JANE BO-77 ROE around,
27 touched Plaintiff JANE BO-77 ROE'S body including her vagina, and made
28

1 comments to Plaintiff JANE BO-77 ROE that she should show Defendant
2 Correctional Officer Brown her vagina.

3 iv. Out of fear of retaliation and further confinement, Plaintiff JANE BO-77
4 ROE never reported the sexual misconduct assuming the complaints would
5 be unanswered, dismissed, ignored, and bury without investigation or
6 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
7 BO-77 ROE was systematically and consistently sexually abused in the
8 “safe haven” environment created and controlled by Defendants
9 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

10 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE BO-
11 77 ROE has experienced ongoing and persistent mental, emotional and
12 psychological problems, including, but not limited to: anxiety; depression;
13 feelings of helplessness; insomnia, questioning of sexual identity; lowered
14 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
15 with others and intimate relationships; loss of trust and control issues with
16 any persons in a position of authority and trust; loss of trust for and fear of
17 police officers and men; flashbacks and intrusive thoughts; stress;
18 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
19 among others.

20 *zzz.* **JANE CM-78 ROE:**

21 i. Plaintiff JANE CM-78 ROE is a female, born on 5/15/1979, who was
22 sexually abused in or around 2014 when the sexual misconduct alleged
23 herein occurred at CCWF.

24 ii. Plaintiff JANE CM-78 ROE was committed to physical mandatory
25 confinement at CCWF where she encountered Defendant Correctional
26 Officer Gregory Rodriguez who had unfettered access and control, and used
27 a position of power, trust, and authority to sexually abuse and harass
28 Plaintiff JANE CM-78 ROE under color of authority on behalf of

1 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
2 of them.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, Defendant Correctional
5 Officer Gregory Rodriguez served as Plaintiff JANE CM-78 ROE'S shift
6 supervisor while Plaintiff JANE CM-78 ROE was employed in B yard.
7 Plaintiff JANE CM-78 ROE was alone in the area where dishes were
8 washed when Defendant Correctional Officer Rodriguez approached
9 Plaintiff JANE CM-78 ROE and fondled Plaintiff JANE CM-78 ROE'S
10 breasts and bare vagina under underwear. This sexual abuse occurred four
11 (4) times. During one instance, Defendant Correctional Officer Rodriguez
12 took out his penis and attempted to force Plaintiff JANE CM-78 ROE to
13 perform oral copulation on him, but he overheard someone approaching
14 which preventing further abuse. Meanwhile, Defendant Correctional
15 Officer Rodriguez managed to digitally penetrate Plaintiff JANE CM-78
16 ROE'S vagina. Defendant Correctional Officer Rodriguez threatened
17 Plaintiff JANE CM-78 ROE if she spoke out, stating he would write
18 Plaintiff JANE CM-78 ROE up and no one would believe Plaintiff JANE
19 CM-78 ROE.

20 iv. Out of fear of retaliation and further confinement, Plaintiff JANE CM-78
21 ROE never reported the sexual misconduct assuming the complaints would
22 be unanswered, dismissed, ignored, and bury without investigation or
23 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
24 CM-78 ROE was systematically and consistently sexually abused in the
25 "safe haven" environment created and controlled by Defendants
26 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

27 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE CM-
28 78 ROE has experienced ongoing and persistent mental, emotional and

1 psychological problems, including, but not limited to: anxiety and post-
2 traumatic stress disorder; depression; feelings of helplessness; insomnia,
3 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
4 difficulty in meaningfully interacting with others and intimate relationships;
5 loss of trust and control issues with any persons in a position of authority
6 and trust; loss of trust for and fear of police officers and men; flashbacks
7 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
8 and loss of enjoyment of life, among others.

9 aaaa. **JANE MK-79 ROE:**

- 10 i. Plaintiff JANE MK-79 ROE is a female, born on 11/16/1981, who was
11 sexually abused in or around 2022 when the sexual misconduct alleged
12 herein occurred at CCWF.
- 13 ii. Plaintiff JANE MK-79 ROE was committed to physical mandatory
14 confinement at CCWF where she encountered DOES Correctional Officer
15 Davis who had unfettered access and control, and used a position of power,
16 trust, and authority to sexually abuse and harass Plaintiff JANE MK-79
17 ROE under color of authority on behalf of Defendants CALIFORNIA and
18 CDCR, THE ABUSERS, DOES, and each of them.
- 19 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
20 means that would justify the sexual misconduct, DOES Correctional Officer
21 Davis held Plaintiff JANE MK-79 ROE back when other inmates were sent
22 to the chow hall (kitchen). Then, DOES Correctional Officer Davis
23 instructed Plaintiff JANE MK-79 ROE to go to the janitor's closet where
24 he forced Plaintiff JANE MK-79 ROE to perform oral copulation on him
25 until he ejaculated in Plaintiff JANE MK-79 ROE'S mouth. DOES
26 Correctional Officer Davis then let Plaintiff JANE MK-79 ROE return to her
27 cell and, at times, offered Plaintiff JANE MK-79 ROE special treatment
28

1 with candy and snacks. The sexual abuse occurred approximately ten (10)
2 times.

3 iv. Out of fear of retaliation and further confinement, Plaintiff JANE MK-79
4 ROE never reported the sexual misconduct assuming the complaints would
5 be unanswered, dismissed, ignored, and bury without investigation or
6 redress thereby allowing the sexual misconduct to continue. Correctional
7 Officer Davis also told Plaintiff JANE MK-79 ROE that no one would
8 believe her and would further threatened her not to tell anyone about the
9 sexual abuse. Plaintiff JANE MK-79 ROE was systematically and
10 consistently sexually abused in the “safe haven” environment created and
11 controlled by Defendants CALIFORNIA and CDCR, THE ABUSERS,
12 DOES, and each of them.

13 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE MK-
14 79 ROE has experienced ongoing and persistent mental, emotional and
15 psychological problems, including, but not limited to: anxiety and post-
16 traumatic stress disorder; depression; feelings of helplessness; insomnia,
17 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
18 difficulty in meaningfully interacting with others and intimate relationships;
19 loss of trust and control issues with any persons in a position of authority
20 and trust; loss of trust for and fear of police officers and men; flashbacks
21 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
22 and loss of enjoyment of life, among others.

23 bbbb. **JANE ST-80 ROE:**

24 i. Plaintiff JANE ST-80 ROE is a female, born on 7/6/1992, who was sexually
25 abused in or around 2016 to 2017 when the sexual misconduct alleged
26 herein occurred at CCWF.

27 ii. Plaintiff JANE ST-80 ROE was committed to physical mandatory
28 confinement at CCWF where she encountered Defendant Correctional

1 Officer Frank Battle who had unfettered access and control, and used a
2 position of power, trust, and authority to sexually abuse and harass Plaintiff
3 JANE ST-80 ROE under color of authority on behalf of Defendants
4 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

5 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
6 means that would justify the sexual misconduct, Defendant Correctional
7 Officer Battle sexually abused Plaintiff JANE ST-80 ROE approximately
8 twelve (12) times. To illustrate the abuse, on one occasion while on the yard,
9 while sitting next to Plaintiff JANE ST-80 ROE, Defendant Correctional
10 Officer Battle digitally penetrated Plaintiff JANE ST-80 ROE'S anus
11 underneath Plaintiff JANE ST-80 ROE'S clothes and grabbed Plaintiff
12 JANE ST-80 ROE'S buttocks hard. On another occasion, Plaintiff JANE
13 ST-80 ROE went to her room and Defendant Correctional Officer Battle
14 grabbed Plaintiff JANE ST-80 ROE and digitally penetrated Plaintiff JANE
15 ST-80 ROE'S vagina and rubbed Plaintiff JANE ST-80 ROE'S nipples,
16 caressing Plaintiff JANE ST-80 ROE'S butt as well. This reoccurred
17 approximately four (4) to five (5) more times. On another occasion,
18 Defendant Correctional Officer Battle permitted Plaintiff JANE ST-80 ROE
19 to wash her clothes when he forced Plaintiff JANE ST-80 ROE to perform
20 oral copulation on him by grabbing Plaintiff JANE ST-80 ROE'S hair and
21 pushing her down toward his penis, while fondling Plaintiff JANE ST-80
22 ROE'S breasts, and ejaculated in Plaintiff JANE ST-80 ROE'S mouth. On
23 another occasion, while Defendant Correctional Officer Battle was working
24 in the building at night, he sent Plaintiff JANE ST-80 ROE to her room
25 instead of proceeding onto dinner because Plaintiff JANE ST-80 ROE was
26 wearing slippers. During this time, Defendant Correctional Officer Battle
27 digitally penetrated Plaintiff JANE ST-80 ROE'S vagina and demanded
28 that Plaintiff JANE ST-80 ROE masturbate his penis. Plaintiff JANE ST-80

1 ROE complied. However, Defendant Correctional Officer Battle then
2 threatened Plaintiff JANE ST-80 ROE, saying that if Plaintiff JANE ST-80
3 ROE told anyone about the sexual abuse, he would put Plaintiff JANE ST-
4 80 ROE in jail for the rest of her life and Plaintiff JANE ST-80 ROE would
5 have to see him forever. On another occasion, Plaintiff JANE ST-80 ROE
6 moved back to 515 and Defendant Correctional Officer Battle let Plaintiff
7 JANE ST-80 ROE wash again where he forced Plaintiff JANE ST-80 ROE
8 to perform oral copulation and fondled Plaintiff JANE ST-80 ROE'S
9 breasts. There were nearly five (5) more instances of sexual abuse thereafter
10 that consisted of oral copulation or digital penetration into Plaintiff JANE
11 ST-80 ROE'S vagina.

12 iv. Out of fear of retaliation and further confinement, Plaintiff JANE ST-80
13 ROE never reported the sexual misconduct assuming the complaints would
14 be unanswered, dismissed, ignored, and bury without investigation or
15 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
16 ST-80 ROE was systematically and consistently sexually abused in the
17 "safe haven" environment created and controlled by Defendants
18 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

19 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE ST-
20 80 ROE has experienced ongoing and persistent mental, emotional and
21 psychological problems, including, but not limited to: anxiety; depression;
22 feelings of helplessness; insomnia, questioning of sexual identity; lowered
23 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
24 with others and intimate relationships; loss of trust and control issues with
25 any persons in a position of authority and trust; loss of trust for and fear of
26 police officers and men; flashbacks and intrusive thoughts; stress;
27 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
28 among others.

1 cccc. **JANE VN-81 ROE:**

- 2 i. Plaintiff JANE VN-81 ROE is a female, born on 9/23/1998, who was
3 sexually abused in or around 2022 when the sexual misconduct alleged
4 herein occurred at CCWF.
- 5 ii. Plaintiff JANE VN-81 ROE was committed to physical mandatory
6 confinement at CCWF where she encountered DOES Correctional Officer
7 Davis who had unfettered access and control, and used a position of power,
8 trust, and authority to sexually abuse and harass Plaintiff JANE VN-81 ROE
9 under color of authority on behalf of Defendants CALIFORNIA and
10 CDCR, THE ABUSERS, DOES, and each of them.
- 11 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
12 means that would justify the sexual misconduct, DOES Correctional Officer
13 Davis fondled Plaintiff JANE VN-81 ROE'S breasts and buttocks, as well
14 as Plaintiff JANE VN-81 ROE'S vagina in a supply room where the toilet
15 paper was stored. DOES Correctional Officer Davis told Plaintiff JANE
16 VN-81 ROE that he would provide Plaintiff JANE VN-81 ROE with items
17 from outside of CCWF if Plaintiff JANE VN-81 ROE had sexual
18 intercourse with him. Plaintiff JANE VN-81 ROE informed her roommates
19 at the time of the foregoing. On another occasion, DOES Correctional
20 Officer Davis pulled Plaintiff JANE VN-81 ROE outside of her room and
21 secluded Plaintiff JANE VN-81 ROE, pulling her pants down. DOES
22 Correctional Officer Davis then had sexual intercourse with Plaintiff JANE
23 VN-81 ROE standing up. On another occasion, while Plaintiff JANE VN-
24 81 ROE worked as a porter, she passed by DOES Correctional Officer Davis
25 and asked for a cigarette. DOES Correctional Officer Davis then provided
26 Plaintiff JANE VN-81 ROE a cigarette. A week or two (2) later, C DOES
27 orrectional Officer Davis left twenty (20) ciagrettes for Plaintiff JANE VN-
28 81 ROE under her bed. Thereater, DOES Correctional Officer Davis told

1 Plaintiff JANE VN-81 ROE not to repeat any of the foregoing because he
2 would get in trouble and fired, and he provides for his family.

3 iv. Out of fear of retaliation and further confinement, Plaintiff JANE VN-81
4 ROE never reported the sexual misconduct assuming the complaints would
5 be unanswered, dismissed, ignored, and bury without investigation or
6 redress thereby allowing the sexual misconduct to continue, with the
7 exception of telling her roommates as noted above. Plaintiff JANE VN-81
8 ROE was systematically and consistently sexually abused in the “safe
9 haven” environment created and controlled by Defendants CALIFORNIA
10 and CDCR, THE ABUSERS, DOES, and each of them.

11 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE VN-
12 81 ROE has experienced ongoing and persistent mental, emotional and
13 psychological problems, including, but not limited to: anxiety; depression;
14 feelings of helplessness; insomnia, questioning of sexual identity; lowered
15 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
16 with others and intimate relationships; loss of trust and control issues with
17 any persons in a position of authority and trust; loss of trust for and fear of
18 police officers and men; flashbacks and intrusive thoughts; stress;
19 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
20 among others.

21 dddd. **JANE AT-82 ROE:**

22 i. Plaintiff JANE AT-82 ROE is a female, born on 8/23/1979, who was
23 sexually abused in or around 2016 when the sexual misconduct alleged
24 herein occurred at CCWF.

25 ii. Plaintiff JANE AT-82 ROE was committed to physical mandatory
26 confinement at CCWF where she encountered DOES Correctional Officer
27 Johnson who had unfettered access and control, and used a position of
28 power, trust, and authority to sexually abuse and harass Plaintiff JANE AT-

1 82 ROE under color of authority on behalf of Defendants CALIFORNIA
2 and CDCR, THE ABUSERS, DOES, and each of them.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, DOES Correctional Officer
5 Johnson took Plaintiff JANE AT-82 ROE into the reception area and
6 reached under Plaintiff JANE AT-82 ROE’S gown, groping Plaintiff JANE
7 AT-82 ROE’S buttocks.

8 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AT-82
9 ROE never reported the sexual misconduct assuming the complaints would
10 be unanswered, dismissed, ignored, and bury without investigation or
11 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
12 AT-82 ROE was systematically and consistently sexually abused in the
13 “safe haven” environment created and controlled by Defendants
14 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

15 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AT-
16 82 ROE has experienced ongoing and persistent mental, emotional and
17 psychological problems, including, but not limited to: anxiety and post-
18 traumatic stress disorder; depression; feelings of helplessness; insomnia,
19 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
20 difficulty in meaningfully interacting with others and intimate relationships;
21 loss of trust and control issues with any persons in a position of authority
22 and trust; loss of trust for and fear of police officers and men; flashbacks
23 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
24 and loss of enjoyment of life, among others.

25 eeee. **JANE TM-83 ROE:**

26 i. Plaintiff JANE TM-83 ROE is a female, born on 5/18/1978, who was
27 sexually abused in or around 2014 when the sexual misconduct alleged
28 herein occurred at CCWF.

- 1 ii. Plaintiff JANE TM-83 ROE was committed to physical mandatory
2 confinement at CCWF where she encountered DOES Correctional Officer
3 Rodriguez who had unfettered access and control, and used a position of
4 power, trust, and authority to sexually abuse and harass Plaintiff JANE TM-
5 83 ROE under color of authority on behalf of Defendants CALIFORNIA
6 and CDCR, THE ABUSERS, DOES, and each of them.
- 7 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
8 means that would justify the sexual misconduct, DOES Correctional Officer
9 Rodriguez took Plaintiff JANE TM-83 ROE to the laundry room area and
10 forced Plaintiff JANE TM-83 ROE to remove her clothes before groping
11 Plaintiff JANE TM-83 ROE’S breasts and buttocks skin-to-skin. This
12 sexual abuse occurred on two (2) occasions. On another occasion, DOES
13 Correctional Officer Rodriguez took Plaintiff JANE TM-83 ROE to the
14 laundry area room again and attempted to sodomize Plaintiff JANE TM-83
15 ROE. Plaintiff JANE TM-83 ROE tried her best to fight DOES Correctional
16 Officer Rodriguez off of her while he threatened to get Plaintiff JANE TM-
17 83 ROE more time in the correctional facility if she reported the abuse to
18 anyone, adding “It is my word against yours.”
- 19 iv. Out of fear of retaliation and further confinement, Plaintiff JANE TM-83
20 ROE never reported the sexual misconduct assuming the complaints would
21 be unanswered, dismissed, ignored, and bury without investigation or
22 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
23 TM-83 ROE was systematically and consistently sexually abused in the
24 “safe haven” environment created and controlled by Defendants
25 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 26 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE TM-
27 83 ROE has experienced ongoing and persistent mental, emotional and
28 psychological problems, including, but not limited to: anxiety; depression;

1 feelings of helplessness; insomnia, questioning of sexual identity; lowered
2 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
3 with others and intimate relationships; loss of trust and control issues with
4 any persons in a position of authority and trust; loss of trust for and fear of
5 police officers and men; flashbacks and intrusive thoughts; stress;
6 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
7 among others.

8 ffff. **JANE EH-84 ROE:**

- 9 i. Plaintiff JANE EH-84 ROE is a female, born on 7/14/1964, who was
10 sexually abused in or around 2009 to 2012 and 2012 to 2015 when the
11 sexual misconduct alleged herein occurred at CCWF.
- 12 ii. Plaintiff JANE EH-84 ROE was committed to physical mandatory
13 confinement at CCWF where she encountered Defendant Correctional
14 Officer Israel Trevino who had unfettered access and control, and used a
15 position of power, trust, and authority to sexually abuse and harass Plaintiff
16 JANE EH-84 ROE under color of authority on behalf of Defendants
17 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 18 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
19 means that would justify the sexual misconduct, between 2009 and 2012,
20 Defendant Correctional Officer Trevino was inside a trailer behind the
21 prison where he tried to pull down Plaintiff JANE EH-84 ROE'S pants and
22 proceeded to fondle Plaintiff JANE EH-84 ROE'S breasts. Defendant
23 Correctional Officer Trevino also grabbed Plaintiff JANE EH-84 ROE'S
24 face as he tried kissing Plaintiff JANE EH-84 ROE. Defendant Correctional
25 Officer Trevino managed to get Plaintiff JANE EH-84 ROE'S pants down
26 and had pulled his own pants down. Fortunately, Defendant Correctional
27 Officer Trevino heard some keys making noise and told Plaintiff JANE EH-
28 84 ROE to get away from him so Plaintiff JANE EH-84 ROE returned to

1 her job and Defendant Correctional Officer Trevino left. On another
2 occasion during this period, where classes were held, Defendant
3 Correctional Officer Trevino fondled Plaintiff JANE EH-84 ROE'S breasts
4 and touched Plaintiff JANE EH-84 ROE'S vagina. During a third incident,
5 in or around 2015, Defendant Correctional Officer Trevino fondled Plaintiff
6 JANE EH-84 ROE'S breasts behind the same trailer. Defendant
7 Correctional Officer Trevino always intimidated Plaintiff JANE EH-84
8 ROE and would routinely stand in front of the kitchen and look at her
9 disrespectfully. Further, Defendant Correctional Officer Trevino told
10 Plaintiff JANE EH-84 ROE, "I can make your day worse" and "I can ruin
11 your life," so as to keep Plaintiff JANE EH-84 ROE scared of him and not
12 repeat the sexual misconduct.

13 iv. Out of fear of retaliation and further confinement, Plaintiff JANE EH-84
14 ROE never reported the sexual misconduct assuming the complaints would
15 be unanswered, dismissed, ignored, and bury without investigation or
16 redress thereby allowing the sexual misconduct to continue. As a result,
17 Plaintiff JANE EH-84 ROE ended up switching jobs because she was so
18 scared of Defendant Correctional Officer Trevino. Plaintiff JANE EH-84
19 ROE was systematically and consistently sexually abused in the "safe
20 haven" environment created and controlled by Defendants CALIFORNIA
21 and CDCR, THE ABUSERS, DOES, and each of them.

22 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE EH-
23 84 ROE has experienced ongoing and persistent mental, emotional and
24 psychological problems, including, but not limited to: anxiety; depression;
25 feelings of helplessness; insomnia, questioning of sexual identity; lowered
26 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
27 with others and intimate relationships; loss of trust and control issues with
28 any persons in a position of authority and trust; loss of trust for and fear of

1 police officers and men; flashbacks and intrusive thoughts; stress;
2 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
3 among others.

4 gggg. **JANE HM-85 ROE:**

- 5 i. Plaintiff JANE HM-85 ROE is a female, born on 10/1/1989, who was
6 sexually abused in or around 2014 when the sexual misconduct alleged
7 herein occurred at CCWF.
- 8 ii. Plaintiff JANE HM-85 ROE was committed to physical mandatory
9 confinement at CCWF where she encountered DOES Correctional Officer
10 Barring who had unfettered access and control, and used a position of
11 power, trust, and authority to sexually abuse and harass Plaintiff JANE HM-
12 85 ROE under color of authority on behalf of Defendants CALIFORNIA
13 and CDCR, THE ABUSERS, DOES, and each of them.
- 14 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
15 means that would justify the sexual misconduct, DOES Correctional Officer
16 Barring began by kissing Plaintiff JANE HM-85 ROE and pulled Plaintiff
17 JANE HM-85 ROE'S hair before pushing Plaintiff JANE HM-85 ROE over
18 a railing and penetrating Plaintiff JANE HM-85 ROE'S vagina with a
19 flashlight. On another occasion, DOES Correctional Officer Barring
20 digitally penetrated Plaintiff JANE HM-85 ROE and raped Plaintiff JANE
21 HM-85 ROE by inserting his penis in Plaintiff JANE HM-85 ROE'S
22 vagina. A female officer named "Patella" worked with DOES Correctional
23 Officer Barring and turned the other way during the aforementioned sexual
24 abuse. This sexual misconduct occurred approximately 11 times, which
25 included inside the cop shop, Plaintiff JANE HM-85 ROE'S cell, out on a
26 docket, and in the main yard by the gym and laundromat.
- 27 iv. Out of fear of retaliation and further confinement, Plaintiff JANE HM-85
28 ROE never reported the sexual misconduct assuming the complaints would

1 be unanswered, dismissed, ignored, and bury without investigation or
2 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
3 HM-85 ROE was systematically and consistently sexually abused in the
4 “safe haven” environment created and controlled by Defendants
5 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 6 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE HM-
7 85 ROE has experienced ongoing and persistent mental, emotional and
8 psychological problems, including, but not limited to: anxiety; depression;
9 feelings of helplessness; insomnia, questioning of sexual identity; lowered
10 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
11 with others and intimate relationships; loss of trust and control issues with
12 any persons in a position of authority and trust; loss of trust for and fear of
13 police officers and men; flashbacks and intrusive thoughts; stress;
14 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
15 among others.

16 hhhh. **JANE MJ-86 ROE:**

- 17 i. Plaintiff JANE MJ-86 ROE is a female, born on 5/16/1993, who was
18 sexually abused beginning in or around 2013 when the sexual misconduct
19 alleged herein occurred at CCWF and CIW.
- 20 ii. Plaintiff JANE MJ-86 ROE was committed to physical mandatory
21 confinement at CCWF and CIW where she encountered DOES Correctional
22 Officer Williams and other male DOES correctional officers whose names
23 Plaintiff JANE MJ-86 ROE cannot recall who had unfettered access and
24 control, and used a position of power, trust, and authority to sexually abuse
25 and harass Plaintiff JANE MJ-86 ROE under color of authority on behalf of
26 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
27 of them.

1 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
2 means that would justify the sexual misconduct, DOES Correctional Officer
3 Williams at CCWF entered Plaintiff JANE MJ-86 ROE’S cell pretending
4 to do a search. However, instead, DOES Correctional Officer Williams
5 forced Plaintiff JANE MJ-86 ROE to spread her legs and digitally
6 penetrated Plaintiff JANE MJ-86 ROE’S vagina and anus. While
7 penetrating Plaintiff JANE MJ-86 ROE, DOES Correctional Officer
8 Williams licked Plaintiff JANE MJ-86 ROE’S neck and breasts.
9 Meanwhile, DOES Correctional Officer Williams threatened to put Plaintiff
10 JANE MJ-86 ROE in the hole if she did not comply. This sexual abuse at
11 CCWF occurred a few times a week and during the night. On another
12 occasions, DOES Correctional Officer Williams put Plaintiff JANE MJ-86
13 ROE in the “bubble” several times to sexual abuse Plaintiff JANE MJ-86
14 ROE. DOES Correctional Officer Williams gave Plaintiff JANE MJ-86
15 ROE special treatment during this time such as outside food and snacks as
16 a “reward.” Other male DOES correctional officers at CCWF would touch
17 Plaintiff JANE MJ-86 ROE inappropriately, but Plaintiff JANE MJ-86 ROE
18 does not recall their names. Furthermore, At CIW, male DOES correctional
19 officers whose names Plaintiff JANE MJ-86 ROE does not recall would
20 bribe Plaintiff JANE MJ-86 ROE and other inmates with special treatment
21 to get sexual gratification.

22 iv. Out of fear of retaliation and further confinement, Plaintiff JANE MJ-86
23 ROE never reported the sexual misconduct assuming the complaints would
24 be unanswered, dismissed, ignored, and bury without investigation or
25 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
26 MJ-86 ROE was systematically and consistently sexually abused in the
27 “safe haven” environment created and controlled by Defendants
28 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE MJ-
2 86 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
6 with others and intimate relationships; loss of trust and control issues with
7 any persons in a position of authority and trust; loss of trust for and fear of
8 police officers and men; flashbacks and intrusive thoughts; stress;
9 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
10 among others.

11 **iiii. JANE PF-87 ROE:**

- 12 i. Plaintiff JANE PF-87 ROE is a female, born on 6/11/1990, who was
13 sexually abused in or around 2018 when the sexual misconduct alleged
14 herein occurred at CCWF and CIW.
- 15 ii. Plaintiff JANE PF-87 ROE was committed to physical mandatory
16 confinement at CIW and CCWF where she encountered DOES Sergeant
17 Martinez and Defendant Correctional Officer Tommy Reyes who had
18 unfettered access and control, and used a position of power, trust, and
19 authority to sexually abuse and harass Plaintiff JANE PF-87 ROE under
20 color of authority on behalf of Defendants CALIFORNIA and CDCR, THE
21 ABUSERS, DOES, and each of them.
- 22 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
23 means that would justify the sexual misconduct, DOES Sergeant Martinez
24 at CIW escorted Plaintiff JANE PF-87 ROE to a bathroom for a
25 drug/alcohol test after Plaintiff JANE PF-87 ROE and her cellmate were
26 taken out of their cells while still in nightgowns. DOES Sergeant Martinez
27 began making lude comments and stating he could make Plaintiff JANE PF-
28 87 ROE'S test go away, even though Plaintiff JANE PF-87 ROE knew she

1 would pass the test. While hiding her genitalia from sight while she peed,
2 DOES Sergeant Martinez began touching Plaintiff JANE PF-87 ROE'S
3 body and stated Plaintiff JANE PF-87 ROE could give him oral copulation
4 or let him touch Plaintiff JANE PF-87 ROE. DOES Sergeant Martinez then
5 took one of his gloves off and began digitally penetrating Plaintiff JANE
6 PF-87 ROE'S vagina while groping Plaintiff JANE PF-87 ROE'S buttocks.
7 DOES Sergeant Martinez then pulled out his penis and forced Plaintiff
8 JANE PF-87 ROE to perform oral copulation on him until he ejaculated in
9 her month. Once DOES Sergeant Martinez stopped, he went outside and
10 said, "Okay, I'll see what I can do." DOES Sergeant Martinez and the other
11 officers at CIW began laughing and cheering with each other. Thereafter,
12 DOES Sergeant Martinez would try and kiss and touch Plaintiff JANE PF-
13 87 ROE. Furthermore, at CCWF, Defendant Correctional Officer Reyes
14 fondled Plaintiff JANE PF-87 ROE'S breasts and buttocks. In the interim,
15 Defendant Correctional Reyes always gave Plaintiff JANE PF-87 ROE a
16 hard time because she would style her hair in a mohawk with jail soap.
17 Defendant Correctional Officer Reyes would not let Plaintiff JANE PF-87
18 ROE eat at the chow hall (kitchen) because of this "outlandish" hairstyle.
19 On an occasion, Defendant Correctional Officer Reyes took Plaintiff JANE
20 PF-87 ROE to a restroom to wash the soap out of her hair and get rid of the
21 mohawk. However, Defendant Correctional Officer Reyes then forced
22 Plaintiff JANE PF-87 ROE'S head in the sink by grabbing her neck and
23 shoving her face into the water and spanking Plaintiff JANE PF-87 ROE'S
24 buttocks.

25 iv. Out of fear of retaliation and further confinement, Plaintiff JANE PF-87
26 ROE never reported the sexual misconduct, with the exception of confiding
27 in her roommate at CIW, assuming the complaints would be unanswered,
28 dismissed, ignored, and bury without investigation or redress thereby

1 allowing the sexual misconduct to continue. Plaintiff JANE PF-87 ROE was
2 systematically and consistently sexually abused in the “safe haven”
3 environment created and controlled by Defendants CALIFORNIA and
4 CDCR, THE ABUSERS, DOES, and each of them.

- 5 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE PF-
6 87 ROE has experienced ongoing and persistent mental, emotional and
7 psychological problems, including, but not limited to: anxiety and post-
8 traumatic stress disorder; depression; feelings of helplessness; insomnia,
9 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
10 difficulty in meaningfully interacting with others and intimate relationships;
11 becoming a lesbian and now married to a woman; loss of trust and control
12 issues with any persons in a position of authority and trust; loss of trust for
13 and fear of police officers and men; flashbacks and intrusive thoughts;
14 stress; nervousness; fear; embarrassment; shame; and loss of enjoyment of
15 life, among others.

16 **jjjj. JANE EP-88 ROE:**

- 17 i. Plaintiff JANE EP-88 ROE is a female, born on 11/15/1983, who was
18 sexually abused in or around 2016 when the sexual misconduct alleged
19 herein occurred at CCWF.
- 20 ii. Plaintiff JANE EP-88 ROE was committed to physical mandatory
21 confinement at CCWF where she encountered Defendant Correctional
22 Officer Santino Morales who had unfettered access and control, and used a
23 position of power, trust, and authority to sexually abuse and harass Plaintiff
24 JANE EP-88 ROE under color of authority on behalf of Defendants
25 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 26 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
27 means that would justify the sexual misconduct, Defendant Correctional
28 Officer Morales bumped into Plaintiff JANE EP-88 ROE while she was in

1 the chow hall (kitchen) on two (2) occasions. During both instances,
2 Defendant Correctional Officer Morales proceeded to put his hand
3 underneath Plaintiff JANE EP-88 ROE’S clothes and, with his bare hands,
4 fondled Plaintiff JANE EP-88 ROE’S breasts, and kissed Plaintiff JANE
5 EP-88 ROE’S lips.

6 iv. Out of fear of retaliation and further confinement, Plaintiff JANE EP-88
7 ROE never reported the sexual misconduct assuming the complaints would
8 be unanswered, dismissed, ignored, and bury without investigation or
9 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
10 EP-88 ROE was systematically and consistently sexually abused in the
11 “safe haven” environment created and controlled by Defendants
12 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

13 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE EP-
14 88 ROE has experienced ongoing and persistent mental, emotional and
15 psychological problems, including, but not limited to: anxiety; depression;
16 feelings of helplessness; insomnia, questioning of sexual identity; lowered
17 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
18 with others and intimate relationships; loss of trust and control issues with
19 any persons in a position of authority and trust; loss of trust for and fear of
20 police officers and men; flashbacks and intrusive thoughts; stress;
21 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
22 among others.

23 kkkk. **JANE HA-89 ROE:**

24 i. Plaintiff JANE HA-89 ROE is a female, born on 12/18/1984, who was
25 sexually abused in or around 2020 when the sexual misconduct alleged
26 herein occurred at CCWF.

27 ii. Plaintiff JANE HA-89 ROE was committed to physical mandatory
28 confinement at CCWF where she encountered DOES Correctional Officer

1 Davis who had unfettered access and control, and used a position of power,
2 trust, and authority to sexually abuse and harass Plaintiff JANE HA-89 ROE
3 under color of authority on behalf of Defendants CALIFORNIA and
4 CDCR, THE ABUSERS, DOES, and each of them.

5 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
6 means that would justify the sexual misconduct, DOES Correctional Officer
7 Davis put a kite (i.e., note) under Plaintiff JANE HA-89 ROE’S door and
8 told Plaintiff JANE HA-89 ROE to stay back for dinner, so Plaintiff JANE
9 HA-89 ROE complied. Then, DOES Correctional Officer Davis handcuffed
10 Plaintiff JANE HA-89 ROE and pushed against a wall before he raped
11 Plaintiff JANE HA-89 ROE by inserting his penis inside Plaintiff JANE
12 HA-89 ROE’S vagina. DOES Correctional Officer Davis then made
13 Plaintiff JANE HA-89 ROE shower to wash herself, watching Plaintiff
14 JANE HA-89 ROE doing so. This incident repeated itself on another
15 occasion.

16 iv. Out of fear of retaliation and further confinement, Plaintiff JANE HA-89
17 ROE never reported the sexual misconduct assuming the complaints would
18 be unanswered, dismissed, ignored, and bury without investigation or
19 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
20 HA-89 ROE was systematically and consistently sexually abused in the
21 “safe haven” environment created and controlled by Defendants
22 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

23 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE HA-
24 89 ROE has experienced ongoing and persistent mental, emotional and
25 psychological problems, including, but not limited to: anxiety and post-
26 traumatic stress disorder; depression; feelings of helplessness; insomnia,
27 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
28 difficulty in meaningfully interacting with others and intimate relationships;

1 loss of trust and control issues with any persons in a position of authority
2 and trust; loss of trust for and fear of police officers and men; flashbacks
3 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
4 and loss of enjoyment of life, among others.

5 **III. JANE KB-90 ROE:**

- 6 i. Plaintiff JANE KB-90 ROE is a female, born on 11/20/1972, who was
7 sexually abused in or around 2018 when the sexual misconduct alleged
8 herein occurred at CCWF.
- 9 ii. Plaintiff JANE KB-90 ROE was committed to physical mandatory
10 confinement at CCWF where she encountered DOES Correctional Officer
11 Flores, DOES Doctor “Big Hands,” and an older DOES correctional officer
12 whose name Plaintiff JANE KB-90 ROE cannot recall who had unfettered
13 access and control, and used a position of power, trust and authority to
14 sexually abuse and harass Plaintiff JANE KB-90 ROE under color of
15 authority on behalf of Defendants CALIFORNIA and CDCR, THE
16 ABUSERS, DOES, and each of them.
- 17 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
18 means that would justify the sexual misconduct, DOES Correctional Officer
19 Flores followed behind Plaintiff JANE KB-90 ROE on four (4) occasions
20 into a supply closet while Plaintiff JANE KB-90 ROE was trying to get
21 cleaning supplies, before groping Plaintiff JANE KB-90 ROE’S genitals
22 and breasts under Plaintiff JANE KB-90 ROE’S clothes and under Plaintiff
23 JANE KB-90 ROE’S underwear. DOES Correctional Officer Flores then
24 digitally penetrated Plaintiff JANE KB-90 ROE’s vagina. During
25 approximately six (6) more instances of sexual abuse, DOES Doctor “Big
26 Hands” repeatedly called Plaintiff JANE KB-90 ROE back in his office for
27 an examination, always justifying the visit with a “concern” for Plaintiff
28 JANE KB-90 ROE’S health. However, the DOES doctor only examined

1 Plaintiff JANE KB-90 ROE’S vagina and was very rough, digitally
2 penetrating Plaintiff JANE KB-90 ROE’S vagina with two (2) of his fingers
3 without wearing gloves and his fingers were extremely big. This sexual
4 misconduct was painful and on several occasions, the DOES doctor caused
5 Plaintiff JANE KB-90 ROE’S to bleed. The DOES doctor was also known
6 for this sexual abuse and did this to many inmates. On another five (5)
7 instances of sexual misconduct, an older DOES officer whose name
8 Plaintiff JANE KB-90 ROE cannot recall entered Plaintiff JANE KB-90
9 ROE’S cell and asked Plaintiff JANE KB-90 ROE to bend over before
10 proceeding to grope Plaintiff JANE KB-90 ROE’S vagina, buttocks, and
11 breasts. After the older DOES correctional officer finished, he told Plaintiff
12 JANE KB-90 ROE that if she reported the sexual abuse, he would make
13 sure that Plaintiff JANE KB-90 ROE stayed longer in prison than needed.

14 iv. Out of fear of retaliation and further confinement, Plaintiff JANE KB-90
15 ROE never reported the sexual misconduct assuming the complaints would
16 be unanswered, dismissed, ignored, and bury without investigation or
17 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
18 KB-90 ROE was systematically and consistently sexually abused in the
19 “safe haven” environment created and controlled by Defendants
20 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

21 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE KB-
22 90 ROE has experienced ongoing and persistent mental, emotional and
23 psychological problems, including, but not limited to: anxiety; depression;
24 feelings of helplessness; insomnia, questioning of sexual identity; lowered
25 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
26 with others and intimate relationships; loss of trust and control issues with
27 any persons in a position of authority and trust; loss of trust for and fear of
28 police officers and men; flashbacks and intrusive thoughts; stress;

1 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
2 among others.

3 mmmm. **JANE MM-91 ROE:**

- 4 i. Plaintiff JANE MM-91 ROE is a female, born on 8/7/1978, who was
5 sexually abused in or around 2013 when the sexual misconduct alleged
6 herein occurred at CCWF.
- 7 ii. Plaintiff JANE MM-91 ROE was committed to physical mandatory
8 confinement at CCWF where she encountered Defendant Correctional
9 Officer Gregory Rodriguez who had unfettered access and control, and used
10 a position of power, trust, and authority to sexually abuse and harass
11 Plaintiff JANE MM-91 ROE under color of authority on behalf of
12 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
13 of them.
- 14 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
15 means that would justify the sexual misconduct, Defendant Correctional
16 Officer Rodriguez pulled Plaintiff JANE MM-91 ROE aside while on the
17 way to the chow hall (kitchen) and fondled Plaintiff JANE MM-91 ROE'S
18 breasts underneath her clothes along with her vagina. On another occasion,
19 Defendant Correctional Officer Rodriguez entered Plaintiff JANE MM-91
20 ROE'S cell and fondled Plaintiff JANE MM-91 ROE'S breasts and
21 buttocks underneath her clothes. On another occasion, Defendant
22 Correctional Officer Rodriguez popped open Plaintiff JANE MM-91
23 ROE'S door of her cell to check on Plaintiff JANE MM-91 ROE. Defendant
24 Correctional Officer Rodriguez then said derogatory remarks to Plaintiff
25 JANE MM-91 ROE before sliding his hands down the back of Plaintiff
26 JANE MM-91 ROE'S shirt and pants, before going underneath Plaintiff
27 JANE MM-91 ROE'S clothing so he could fondle Plaintiff JANE MM-91
28 ROE'S buttocks and vagina. The derogatory remarks continued, and the

1 remarks occurred nearly daily when Defendant Correctional Officer
2 Rodriguez told Plaintiff JANE MM-91 ROE that he wanted to lick and
3 touch Plaintiff JANE MM-91 ROE’S breasts. Meanwhile, Defendant
4 Correctional Officer Rodriguez let Plaintiff JANE MM-91 ROE take items
5 and various food from the kitchen in return for the sexual misconduct.

6 iv. Out of fear of retaliation and further confinement, Plaintiff JANE MM-91
7 ROE never reported the sexual misconduct assuming the complaints would
8 be unanswered, dismissed, ignored, and bury without investigation or
9 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
10 MM-91 ROE was systematically and consistently sexually abused in the
11 “safe haven” environment created and controlled by Defendants
12 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

13 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE MM-
14 91 ROE has experienced ongoing and persistent mental, emotional and
15 psychological problems, including, but not limited to: anxiety and post-
16 traumatic stress disorder; depression; feelings of helplessness; insomnia,
17 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
18 difficulty in meaningfully interacting with others and intimate relationships;
19 loss of trust and control issues with any persons in a position of authority
20 and trust; loss of trust for and fear of police officers and men; flashbacks
21 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
22 and loss of enjoyment of life, among others.

23 nnnn. **JANE CB-92 ROE:**

24 i. Plaintiff JANE CB-92 ROE is a female, born on 6/7/1969, who was sexually
25 abused in or around 2013 to 2014 when the sexual misconduct alleged
26 herein occurred at CCWF.

27 ii. Plaintiff JANE Plaintiff JANE MM-91 ROE ROE was committed to
28 physical mandatory confinement at CCWF where she encountered DOES

1 Correctional Officer Flores who had unfettered access and control, and used
2 a position of power, trust, and authority to sexually abuse and harass
3 Plaintiff JANE CB-92 ROE under color of authority on behalf of
4 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
5 of them.

6 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
7 means that would justify the sexual misconduct, DOES Correctional Officer
8 Flores opened Plaintiff JANE CB-92 ROE'S cell door each morning for
9 work as Plaintiff JANE CB-92 ROE was a kitchen worker. On one morning,
10 DOES Correctional Officer Flores took Plaintiff JANE CB-92 ROE to the
11 shop where he made Plaintiff JANE CB-92 ROE bend over and raped
12 Plaintiff JANE CB-92 ROE. This occurred on multiple occasions.
13 Thereafter, on two (2) more instances of sexual misconduct, DOES
14 Correctional Officer Flores raped Plaintiff JANE CB-92 ROE in the staff
15 restroom. DOES Correctional Officer Flores ejaculated inside Plaintiff
16 JANE CB-92 ROE'S vagina and required Plaintiff JANE CB-92 ROE to
17 clean herself. During other instances, DOES Correctional Officer Flores
18 ejaculated on Plaintiff JANE CB-92 ROE'S back. DOES Correctional
19 Officer Flores gave Plaintiff JANE CB-92 ROE tobacco and food from
20 outside CCWF in exchange for the sexual abuse.

21 iv. Out of fear of retaliation and further confinement, Plaintiff JANE CB-92
22 ROE never reported the sexual misconduct assuming the complaints would
23 be unanswered, dismissed, ignored, and bury without investigation or
24 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
25 CB-92 ROE was systematically and consistently sexually abused in the
26 "safe haven" environment created and controlled by Defendants
27 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE CB-
2 92 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety and post-
4 traumatic stress disorder; depression; feelings of helplessness; insomnia,
5 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
6 difficulty in meaningfully interacting with others and intimate relationships;
7 loss of trust and control issues with any persons in a position of authority
8 and trust; loss of trust for and fear of police officers and men; flashbacks
9 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
10 and loss of enjoyment of life, among others.

11 oooo. **JANE AD-93 ROE:**

- 12 i. Plaintiff JANE AD-93 ROE is a female, born on 7/5/1994, who was
13 sexually abused in or around 2021 when the sexual misconduct alleged
14 herein occurred at CCWF and CIW.
- 15 ii. Plaintiff JANE AD-93 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered DOES Correctional Officer
17 Garcia, and CIW where she encountered various DOES correctional
18 officers whose names Plaintiff JANE AD-93 ROE cannot recall, who had
19 unfettered access and control, and used a position of power, trust and
20 authority to sexually abuse and harass Plaintiff JANE AD-93 ROE under
21 color of authority on behalf of Defendants CALIFORNIA and CDCR, THE
22 ABUSERS, DOES, and each of them.
- 23 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
24 means that would justify the sexual misconduct, DOES Correctional Officer
25 Garcia at CCWF threatened Plaintiff JANE AD-93 ROE that if she did not
26 go to “classes” or participate, he would write her up. DOES Correctional
27 Officer Garcia then forced Plaintiff JANE AD-93 ROE to go inside his office
28 where he removed Plaintiff JANE AD-93 ROE’S pants and digitally

1 penetrated Plaintiff JANE AD-93 ROE'S vagina. On another occasion,
2 DOES Correctional Officer Garcia tried to pull out his penis, but Plaintiff
3 JANE AD-93 ROE kept fighting him off and getting loud so he finished
4 touching Plaintiff JANE AD-93 ROE'S body and then dismissed her.
5 DOES Correctional Officer Garcia tried to take advantage of Plaintiff JANE
6 AD-93 ROE by telling Plaintiff JANE AD-93 ROE that he would bring her
7 goodies from outside CCWF in exchange for sexual favors. Thereafter, at
8 CIW, various DOES correctional officers, whose names Plaintiff JANE
9 AD-93 ROE cannot recall, made sexual comments to Plaintiff JANE AD-
10 93 ROE.

11 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AD-93
12 ROE never reported the sexual misconduct assuming the complaints would
13 be unanswered, dismissed, ignored, and bury without investigation or
14 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
15 AD-93 ROE was systematically and consistently sexually abused in the
16 "safe haven" environment created and controlled by Defendants
17 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

18 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AD-
19 93 ROE has experienced ongoing and persistent mental, emotional and
20 psychological problems, including, but not limited to: anxiety and post-
21 traumatic stress disorder; depression; feelings of helplessness; insomnia,
22 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
23 difficulty in meaningfully interacting with others and intimate relationships;
24 loss of trust and control issues with any persons in a position of authority
25 and trust; loss of trust for and fear of police officers and men; flashbacks
26 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
27 and loss of enjoyment of life, among others.

28 pppp. **JANE DR-94 ROE:**

- 1 i. Plaintiff JANE DR-94 ROE is a female, born on 4/2/1991, who was
2 sexually abused in or around 2017 when the sexual misconduct alleged
3 herein occurred at CCWF.
- 4 ii. Plaintiff JANE DR-94 ROE was committed to physical mandatory
5 confinement at CCWF where she encountered DOES Correctional Officer
6 Brown who had unfettered access and control, and used a position of power,
7 trust, and authority to sexually abuse and harass Plaintiff JANE DR-94 ROE
8 under color of authority on behalf of Defendants CALIFORNIA and
9 CDCR, THE ABUSERS, DOES, and each of them.
- 10 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
11 means that would justify the sexual misconduct, DOES Correctional Officer
12 Brown entered Plaintiff JANE DR-94 ROE’S cell while she was inside with
13 another roommate. DOES Correctional Officer Brown then fondled Plaintiff
14 JANE DR-94 ROE’S breasts underneath her clothes.
- 15 iv. Out of fear of retaliation and further confinement, Plaintiff JANE DR-94
16 ROE never reported the sexual misconduct assuming the complaints would
17 be unanswered, dismissed, ignored, and bury without investigation or
18 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
19 DR-94 ROE was systematically and consistently sexually abused in the
20 “safe haven” environment created and controlled by Defendants
21 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 22 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE DR-
23 94 ROE has experienced ongoing and persistent mental, emotional and
24 psychological problems, including, but not limited to: anxiety and post-
25 traumatic stress disorder; depression; feelings of helplessness; insomnia,
26 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
27 difficulty in meaningfully interacting with others and intimate relationships;
28 loss of trust and control issues with any persons in a position of authority

1 and trust; loss of trust for and fear of police officers and men; flashbacks
2 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
3 and loss of enjoyment of life, among others.

4 qqqq. **JANE MH-95 ROE:**

- 5 i. Plaintiff JANE MH-95 ROE is a female, born on 5/17/1980, who was
6 sexually abused in or around 2014 when the sexual misconduct alleged
7 herein occurred at CCWF.
- 8 ii. Plaintiff JANE MH-95 ROE was committed to physical mandatory
9 confinement at CCWF where she encountered Defendant Correctional
10 Officer Gregory Rodriguez who had unfettered access and control, and used
11 a position of power, trust, and authority to sexually abuse and harass
12 Plaintiff JANE MH-95 ROE under color of authority on behalf of
13 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
14 of them.
- 15 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
16 means that would justify the sexual misconduct, Defendant Correctional
17 Officer Rodriguez decided to search Plaintiff JANE MH-95 ROE for no
18 reason. However, instead of a search, Defendant Correctional Officer
19 Rodriguez had Plaintiff JANE MH-95 ROE get naked and touched inside
20 Plaintiff JANE MH-95 ROE'S leg before digitally penetrating her vagina
21 skin-to-skin.
- 22 iv. Out of fear of retaliation and further confinement, Plaintiff JANE MH-95
23 ROE submitted a request to report the sexual misconduct but assumed her
24 complaints would be unanswered, dismissed, ignored, and bury without
25 investigation or redress thereby allowing the sexual misconduct to continue.
26 Plaintiff JANE MH-95 ROE was systematically and consistently sexually
27 abused in the "safe haven" environment created and controlled by
28

1 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
2 of them.

- 3 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE MH-
4 95 ROE has experienced ongoing and persistent mental, emotional and
5 psychological problems, including, but not limited to: anxiety and post-
6 traumatic stress disorder; depression; feelings of helplessness; insomnia,
7 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
8 difficulty in meaningfully interacting with others and intimate relationships;
9 loss of trust and control issues with any persons in a position of authority
10 and trust; loss of trust for and fear of police officers and men; flashbacks
11 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
12 and loss of enjoyment of life, among others.

13 rrrr. **JANE LJ-96 ROE:**

- 14 i. Plaintiff JANE LJ-96 ROE is a female, born on 9/17/1975, who was
15 sexually abused in or around 2020 when the sexual misconduct alleged
16 herein occurred at CCWF.
- 17 ii. Plaintiff JANE LJ-96 ROE was committed to physical mandatory
18 confinement at CCWF where she encountered DOES Correctional Officer
19 R. Smith who had unfettered access and control, and used a position of
20 power, trust, and authority to sexually abuse and harass Plaintiff JANE LJ-
21 96 ROE under color of authority on behalf of Defendants CALIFORNIA
22 and CDCR, THE ABUSERS, DOES, and each of them.
- 23 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
24 means that would justify the sexual misconduct, DOES Correctional Officer
25 Smith reprimanded Plaintiff JANE LJ-96 ROE on the way to class by taking
26 Plaintiff JANE LJ-96 ROE into a bathroom and trying to kiss Plaintiff
27 JANE LJ-96 ROE and digitally penetrate her vagina. DOES Correctional
28 Officer Smith stopped when he heard someone approaching and then

1 threatened Plaintiff JANE LJ-96 ROE with the hole if she reported the
2 sexual misconduct. Meanwhile, DOES Correctional Officer Smith gave
3 Plaintiff JANE LJ-96 ROE special treatment including cigarettes.

4 iv. Out of fear of retaliation and further confinement, Plaintiff JANE LJ-96
5 ROE never reported the sexual misconduct assuming the complaints would
6 be unanswered, dismissed, ignored, and bury without investigation or
7 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
8 LJ-96 ROE was systematically and consistently sexually abused in the “safe
9 haven” environment created and controlled by Defendants CALIFORNIA
10 and CDCR, THE ABUSERS, DOES, and each of them.

11 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE LJ-
12 96 ROE has experienced ongoing and persistent mental, emotional and
13 psychological problems, including, but not limited to: anxiety and post-
14 traumatic stress disorder; depression; feelings of helplessness; insomnia,
15 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
16 difficulty in meaningfully interacting with others and intimate relationships;
17 loss of trust and control issues with any persons in a position of authority
18 and trust; loss of trust for and fear of police officers and men; flashbacks
19 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
20 and loss of enjoyment of life, among others.

21 ssss. **JANE DT-97 ROE:**

22 i. Plaintiff JANE DT-97 ROE is a female, born on 1/2/1995, who was sexually
23 abused in or around 2016 when the sexual misconduct alleged herein
24 occurred at CCWF.

25 ii. Plaintiff JANE DT-97 ROE was committed to physical mandatory
26 confinement at CCWF where she encountered Defendant Captain Koraodus
27 Turner who had unfettered access and control, and used a position of power,
28 trust and authority to sexually abuse and harass Plaintiff JANE DT-97 ROE

1 under color of authority on behalf of Defendants CALIFORNIA and
2 CDCR, THE ABUSERS, DOES, and each of them.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, Defendant Captain Turner
5 pulled Plaintiff JANE DT-97 ROE out of her cell to a private room and said,
6 “Anyone can do anything to you here.” Defendant Captain Turner then put
7 his hand underneath Plaintiff JANE DT-97 ROE’S shirt and fondled her
8 breasts skin-to-skin, touching her genitals.

9 iv. Out of fear of retaliation and further confinement, Plaintiff JANE DT-97
10 ROE never reported the sexual misconduct assuming the complaints would
11 be unanswered, dismissed, ignored, and bury without investigation or
12 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
13 DT-97 ROE was systematically and consistently sexually abused in the
14 “safe haven” environment created and controlled by Defendants
15 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

16 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE DT-
17 97 ROE has experienced ongoing and persistent mental, emotional and
18 psychological problems, including, but not limited to: anxiety; depression;
19 feelings of helplessness; insomnia, questioning of sexual identity; lowered
20 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
21 with others and intimate relationships; loss of trust and control issues with
22 any persons in a position of authority and trust; loss of trust for and fear of
23 police officers and men; flashbacks and intrusive thoughts; stress;
24 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
25 among others.

26 **tttt. JANE PM-98 ROE:**

- 1 i. Plaintiff JANE PM-98 ROE is a female, born on 5/29/1969, who was
2 sexually abused in or around 2018 when the sexual misconduct alleged
3 herein occurred at CCWF.
- 4 ii. Plaintiff JANE PM-98 ROE was committed to physical mandatory
5 confinement at CCWF where she encountered Defendant Correctional
6 Officer Gregory Rodriguez who had unfettered access and control, and used
7 a position of power, trust and authority to sexually abuse and harass Plaintiff
8 JANE PM-98 ROE under color of authority on behalf of Defendants
9 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 10 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
11 means that would justify the sexual misconduct, Defendant Correctional
12 Officer Rodriguez entered Plaintiff JANE PM-98 ROE'S cell and grabbed
13 Plaintiff JANE PM-98 ROE'S breasts underneath her clothes. Defendant
14 Correctional Officer Rodriguez also reached into Plaintiff JANE PM-98
15 ROE'S pants and digitally penetrated her vagina as he threatened Plaintiff
16 JANE PM-98 ROE to have her case paperwork taken away so she would do
17 more time if she reported the sexual abuse. This sexual misconduct occurred
18 15 times. Defendant Correctional Officer Rodriguez also forced Plaintiff
19 JANE PM-98 ROE to perform oral copulation on him until he ejaculated on
20 her face or body. The sexual misconduct occurred approximately four (4)
21 to five (5) times. Defendant Correctional Officer Rodriguez also tried to
22 penetrate Plaintiff JANE PM-98 ROE'S vagina with his penis, but he
23 stopped because he heard someone coming.
- 24 iv. Out of fear of retaliation and further confinement, Plaintiff JANE PM-98
25 ROE never reported the sexual misconduct assuming the complaints would
26 be unanswered, dismissed, ignored, and bury without investigation or
27 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
28 PM-98 ROE was systematically and consistently sexually abused in the

1 “safe haven” environment created and controlled by Defendants
2 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 3 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE PM-
4 98 ROE has experienced ongoing and persistent mental, emotional and
5 psychological problems, including, but not limited to: anxiety and post-
6 traumatic stress disorder; depression; feelings of helplessness; insomnia,
7 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
8 difficulty in meaningfully interacting with others and intimate relationships;
9 loss of trust and control issues with any persons in a position of authority
10 and trust; loss of trust for and fear of police officers and men; flashbacks
11 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
12 and loss of enjoyment of life, among others.

13 uuuu. **JANE SS-99 ROE:**

- 14 i. Plaintiff JANE SS-99 ROE is a female, born on 5/11/1985, who was
15 sexually abused in or around 2015 when the sexual misconduct alleged
16 herein occurred at CCWF.
- 17 ii. Plaintiff JANE SS-99 ROE was committed to physical mandatory
18 confinement at CCWF where she encountered Defendant Correctional
19 Officer Gregory Rodriguez who had unfettered access and control, and used
20 a position of power, trust and authority to sexually abuse and harass Plaintiff
21 JANE SS-99 ROE under color of authority on behalf of Defendants
22 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 23 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
24 means that would justify the sexual misconduct, Defendant Correctional
25 Officer Rodriguez stopped Plaintiff JANE SS-99 ROE while she was en
26 route to a a medical office, pushed Plaintiff JANE SS-99 ROE into a supply
27 closet where cleaning items were stored, and said, “You’ve been acting like
28 a slut and I will show you what I do to sluts.” Defendant Correctional

1 Officer Rodriguez then put his hands on Plaintiff JANE SS-99 ROE’S hips
2 and raped Plaintiff JANE SS-99 ROE by inserting his penis in Plaintiff
3 JANE SS-99 ROE’S vagina, while threatening Plaintiff JANE SS-99 ROE:
4 “Don’t tell anyone. Who are they going to believe, an inmate or me?”

5 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SS-99
6 ROE never reported the sexual misconduct assuming the complaints would
7 be unanswered, dismissed, ignored, and bury without investigation or
8 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
9 SS-99 ROE was systematically and consistently sexually abused in the “safe
10 haven” environment created and controlled by Defendants CALIFORNIA
11 and CDCR, THE ABUSERS, DOES, and each of them.

12 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SS-
13 99 ROE has experienced ongoing and persistent mental, emotional and
14 psychological problems, including, but not limited to: anxiety; depression;
15 feelings of helplessness; insomnia, questioning of sexual identity; lowered
16 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
17 with others and intimate relationships; loss of trust and control issues with
18 any persons in a position of authority and trust; loss of trust for and fear of
19 police officers and men; flashbacks and intrusive thoughts; stress;
20 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
21 among others.

22 vvvv. **JANE ER-100 ROE:**

23 i. Plaintiff JANE ER-100 ROE is a female, born on 7/31/1970, who was
24 sexually abused in or around 2021 when the sexual misconduct alleged
25 herein occurred at CCWF.

26 ii. Plaintiff JANE ER-100 ROE was committed to physical mandatory
27 confinement at CCWF where she encountered DOES Correctional Officer
28 Rodriguez as well as two (2) DOES male correctional officers, whose name

1 Plaintiff JANE ER-100 ROE cannot recall, who had unfettered access and
2 control, and used a position of power, trust and authority to sexually abuse
3 and harass Plaintiff JANE ER-100 ROE under color of authority on behalf
4 of Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and
5 each of them.

6 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
7 means that would justify the sexual misconduct, DOES Correctional Officer
8 Rodriguez took Plaintiff JANE ER-100 ROE into a room and told Plaintiff
9 JANE ER-100 ROE to strip down and get ready. Plaintiff JANE ER-100
10 ROE began crying, but DOES Correctional Officer Rodriguez told her not
11 to make any noise and take her pants off. Plaintiff JANE ER-100 ROE
12 complied and removed her pants before DOES Correctional Officer
13 Rodriguez sodomized Plaintiff JANE ER-100 ROE'S anus with his penis.
14 Plaintiff JANE ER-100 ROE then panicked so DOES Correctional Officer
15 Rodriguez stopped the sexual abuse and got angry, proceeding to tell
16 Plaintiff JANE ER-100 ROE not to say anything about the sexual abuse. On
17 another occasion, Plaintiff JANE ER-100 ROE was on her way to make a
18 phone call when a male DOES correctional officer, whose name Plaintiff
19 JANE ER-100 ROE does not recall, followed Plaintiff JANE ER-100 ROE
20 into a restroom, forced Plaintiff JANE ER-100 ROE to perform oral
21 copulation on him, and ejaculated as he fondled Plaintiff JANE ER-100
22 ROE'S breasts. This abuse reoccurred in this restroom and in the chow hall
23 (kitchen) approximately four (4) more times. Thereafter, on a few more
24 occasions in the restroom, another male DOES correctional officer, whose
25 name Plaintiff JANE ER-100 ROE does not recall, forced Plaintiff JANE
26 ER-100 ROE to remove her pants as he fondled Plaintiff JANE ER-100
27 ROE'S breasts and raped her.

1 iv. Out of fear of retaliation and further confinement, Plaintiff JANE ER-100
2 ROE never reported the sexual misconduct assuming the complaints would
3 be unanswered, dismissed, ignored, and bury without investigation or
4 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
5 ER-100 ROE was systematically and consistently sexually abused in the
6 “safe haven” environment created and controlled by Defendants
7 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

8 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE ER-
9 100 ROE has experienced ongoing and persistent mental, emotional and
10 psychological problems, including, but not limited to: anxiety; depression;
11 feelings of helplessness; insomnia, questioning of sexual identity; lowered
12 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
13 with others and intimate relationships; loss of trust and control issues with
14 any persons in a position of authority and trust; loss of trust for and fear of
15 police officers and men; flashbacks and intrusive thoughts; stress;
16 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
17 among others.

18 www. **JANE CC-101 ROE:**

19 i. Plaintiff JANE CC-101 ROE is a female, born on 8/4/1992, who was
20 sexually abused in or around 2021 when the sexual misconduct alleged
21 herein occurred at CIW.

22 ii. Plaintiff JANE CC-101 ROE was committed to physical mandatory
23 confinement at CIW where she encountered DOES Correctional Officer
24 Wood who had unfettered access and control, and used a position of power,
25 trust and authority to sexually abuse and harass Plaintiff JANE CC-101
26 ROE under color of authority on behalf of Defendants CALIFORNIA and
27 CDCR, THE ABUSERS, DOES, and each of them.

1 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
2 means that would justify the sexual misconduct, DOES Correctional Officer
3 Wood unlocked the shower and told Plaintiff JANE CC-101 that he wanted
4 to “suck on her titties.” As DOES Correctional Officer Wood said this, he
5 saw someone doing laundry, unlocked a shower, and threw Plaintiff JANE
6 CC-101 inside the shower, pulling up Plaintiff JANE CC-101’S skirt and
7 putting his mouth on Plaintiff JANE CC-101’S breasts. On another
8 occasion, DOES Correctional Officer Wood approached Plaintiff JANE
9 CC-101, who was lifting a trashcan to empty into a dumpster, and fondled
10 her vagina before smelling her hair. DOES Correctional Officer Wood told
11 Plaintiff JANE CC-101 that he wanted to have a relationship with Plaintiff
12 JANE CC-101 after she got out of prison. DOES Correctional Officer Wood
13 proceeded to harrass Plaintiff JANE CC-101. The sexual abuse continued
14 on another occasion.

15 iv. Out of fear of retaliation and further confinement, Plaintiff JANE CC-101
16 ROE never reported the sexual misconduct assuming the complaints would
17 be unanswered, dismissed, ignored, and bury without investigation or
18 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
19 CC-101 ROE was systematically and consistently sexually abused in the
20 “safe haven” environment created and controlled by Defendants
21 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

22 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE CC-
23 101 ROE has experienced ongoing and persistent mental, emotional and
24 psychological problems, including, but not limited to: anxiety and post-
25 traumatic stress disorder; depression; feelings of helplessness; insomnia,
26 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
27 difficulty in meaningfully interacting with others and intimate relationships;
28 loss of trust and control issues with any persons in a position of authority

1 and trust; loss of trust for and fear of police officers and men; flashbacks
2 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
3 and loss of enjoyment of life, among others.

4 **xxxx. JANE BM-102 ROE:**

- 5 i. Plaintiff JANE BM-102 ROE is a female, born on 2/8/1983, who was
6 sexually abused in or around 2018 when the sexual misconduct alleged
7 herein occurred at CCWF.
- 8 ii. Plaintiff JANE BM-102 ROE was committed to physical mandatory
9 confinement at CCWF where she encountered DOES Correctional Officer
10 Molden or Mullen who had unfettered access and control, and used a
11 position of power, trust and authority to sexually abuse and harass Plaintiff
12 JANE BM-102 ROE under color of authority on behalf of Defendants
13 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 14 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
15 means that would justify the sexual misconduct, DOES Correctional Officer
16 Molden or Mullen pulled Plaintiff JANE BM-102 ROE out of her A yard
17 cell and took her to a utility closet “to clean.” Instead, however, DOES
18 Correctional Officer Molden or Mullen pushed Plaintiff JANE BM-102
19 ROE down onto the ground and forced Plaintiff JANE BM-102 ROE to
20 perform oral copulation on him until he ejaculated. After the sexual abuse,
21 DOES Correctional Officer Molden or Mullen gave Plaintiff JANE BM-
22 102 ROE special treatment such as pizza, but he soon became rude toward
23 Plaintiff JANE BM-102 ROE because Plaintiff JANE BM-102 ROE did not
24 want to be pulled out of her cell further since she now knew that she would
25 get sexually abused.
- 26 iv. Out of fear of retaliation and further confinement, Plaintiff JANE BM-102
27 ROE never reported the sexual misconduct assuming the complaints would
28 be unanswered, dismissed, ignored, and bury without investigation or

1 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
2 BM-102 ROE was systematically and consistently sexually abused in the
3 “safe haven” environment created and controlled by Defendants
4 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 5 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE BM-
6 102 ROE has experienced ongoing and persistent mental, emotional and
7 psychological problems, including, but not limited to: anxiety; depression;
8 feelings of helplessness; insomnia, questioning of sexual identity; lowered
9 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
10 with others and intimate relationships; loss of trust and control issues with
11 any persons in a position of authority and trust; loss of trust for and fear of
12 police officers and men; flashbacks and intrusive thoughts; stress;
13 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
14 among others.

15 yyy. **JANE JS-103 ROE:**

- 16 i. Plaintiff JANE JS-103 ROE is a female, born on 11/22/1990, who was
17 sexually abused in or around 2018 when the sexual misconduct alleged
18 herein occurred at CCWF.
- 19 ii. Plaintiff JANE JS-103 ROE was committed to physical mandatory
20 confinement at CCWF where she encountered DOES Correctional Officer
21 Avalos who had unfettered access and control, and used a position of power,
22 trust and authority to sexually abuse and harass Plaintiff JANE JS-103 ROE
23 under color of authority on behalf of Defendants CALIFORNIA and
24 CDCR, THE ABUSERS, DOES, and each of them.
- 25 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
26 means that would justify the sexual misconduct, DOES Correctional Officer
27 Avalos bribed Plaintiff JANE JS-103 ROE with Victoria’s Secret
28 undergarments, body sprays, and other outside products to get sexual

1 favors. DOES Correctional Officer Avalos raped Plaintiff JANE JS-103
2 ROE at least five (5) to six (6) times by inserting his penis in Plaintiff
3 JANE JS-103 ROE'S vagina and ejaculating every time on Plaintiff JANE
4 JS-103 ROE'S vagina, stomach, or back. DOES Correctional Officer
5 Avalos also groped Plaintiff JANE JS-103 ROE and made her perform oral
6 copulation on him.

7 iv. Out of fear of retaliation and further confinement, Plaintiff JANE JS-103
8 ROE never reported the sexual misconduct assuming the complaints would
9 be unanswered, dismissed, ignored, and bury without investigation or
10 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
11 JS-103 ROE was systematically and consistently sexually abused in the
12 "safe haven" environment created and controlled by Defendants
13 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

14 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE JS-
15 103 ROE has experienced ongoing and persistent mental, emotional and
16 psychological problems, including, but not limited to: anxiety; depression;
17 feelings of helplessness; insomnia, questioning of sexual identity; lowered
18 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
19 with others and intimate relationships; loss of trust and control issues with
20 any persons in a position of authority and trust; loss of trust for and fear of
21 police officers and men; flashbacks and intrusive thoughts; stress;
22 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
23 among others.

24 *zzzz.* **JANE SP-104 ROE:**

25 i. Plaintiff JANE SP-104 ROE is a female, born on 10/26/1985, who was
26 sexually abused in or around 2015 when the sexual misconduct alleged
27 herein occurred at CCWF.
28

- 1 ii. Plaintiff JANE SP-104 ROE was committed to physical mandatory
2 confinement at CCWF where she encountered DOES Correctional Officer
3 E, known as “Mr. E,” who had unfettered access and control, and used a
4 position of power, trust and authority to sexually abuse and harass Plaintiff
5 JANE SP-104 ROE under color of authority on behalf of Defendants
6 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 7 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
8 means that would justify the sexual misconduct, DOES Correctional Officer
9 E entered Plaintiff JANE SP-104 ROE’S room while she was alone and
10 said, “You think you’re a man? Well, let me show you.” DOES Correctional
11 Officer E then put his hand under Plaintiff JANE SP-104 ROE’S shirt and
12 groped Plaintiff JANE SP-104 ROE’S bare breast. This sexual misconduct
13 occurred again on another occasion.
- 14 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SP-104
15 ROE never reported the sexual misconduct assuming the complaints would
16 be unanswered, dismissed, ignored, and bury without investigation or
17 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
18 SP-104 ROE was systematically and consistently sexually abused in the
19 “safe haven” environment created and controlled by Defendants
20 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 21 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SP-
22 104 ROE has experienced ongoing and persistent mental, emotional and
23 psychological problems, including, but not limited to: anxiety and post-
24 traumatic stress disorder; depression; feelings of helplessness; insomnia,
25 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
26 difficulty in meaningfully interacting with others and intimate relationships;
27 loss of trust and control issues with any persons in a position of authority
28 and trust; loss of trust for and fear of police officers and men; flashbacks

1 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
2 and loss of enjoyment of life, among others.

3 aaaaa. **JANE LP-105 ROE:**

- 4 i. Plaintiff JANE LP-105 ROE is a female, born on 7/30/1974, who was
5 sexually abused in or around 2015 when the sexual misconduct alleged
6 herein occurred at CCWF.
- 7 ii. Plaintiff JANE LP-105 ROE was committed to physical mandatory
8 confinement at CCWF where she encountered DOES Correctional Officer
9 Rodriguez who had unfettered access and control, and used a position of
10 power, trust and authority to sexually abuse and harass Plaintiff JANE LP-
11 105 ROE under color of authority on behalf of Defendants CALIFORNIA
12 and CDCR, THE ABUSERS, DOES, and each of them.
- 13 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
14 means that would justify the sexual misconduct, DOES Correctional Officer
15 Rodriguez grinded his body on Plaintiff JANE LP-105 ROE’S buttocks and
16 put his hands on Plaintiff JANE LP-105 ROE’S vagina. DOES Correctional
17 Officer Rodriguez also entered Plaintiff JANE LP-105 ROE’S room to
18 bother Plaintiff JANE LP-105 ROE. Thereafter, DOES Correctional Officer
19 DOES Rodriguez called Plaintiff JANE LP-105 ROE out of her cell and put
20 his hands down Plaintiff JANE LP-105 ROE’S pants, grinding his body on
21 Plaintiff JANE LP-105 ROE’S body again.
- 22 iv. Out of fear of retaliation and further confinement, Plaintiff JANE LP-105
23 ROE never reported the sexual misconduct assuming the complaints would
24 be unanswered, dismissed, ignored, and bury without investigation or
25 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
26 LP -105 ROE was systematically and consistently sexually abused in the
27 “safe haven” environment created and controlled by Defendants
28 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE LP-
2 105 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
6 with others and intimate relationships; loss of trust and control issues with
7 any persons in a position of authority and trust; loss of trust for and fear of
8 police officers and men; flashbacks and intrusive thoughts; stress;
9 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
10 among others.

11 bbbbb. **JANE KB-106 ROE:**

- 12 i. Plaintiff JANE KB-106 ROE is a female, born on 12/16/1979, who was
13 sexually abused in or around 2014 when the sexual misconduct alleged
14 herein occurred at CIW.
- 15 ii. Plaintiff JANE Plaintiff JANE KB-106 ROE ROE was committed to
16 physical mandatory confinement at CIW where she encountered Defendant
17 Correctional Officer Frank Chavez who had unfettered access and control,
18 and used a position of power, trust and authority to sexually abuse and
19 harass Plaintiff JANE KB-106 ROE under color of authority on behalf of
20 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
21 of them.
- 22 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
23 means that would justify the sexual misconduct, Defendant Correctional
24 Officer Chavez handcuffed Plaintiff JANE KB-106 ROE to the stairs that
25 went up to a loft while Plaintiff JANE KB-106 ROE was doing aerobics
26 exercises in the auditorium with another women. Defendant Correctional
27 Officer Chavez proceeded to intimidate Plaintiff JANE KB-106 ROE with
28 losing her privileges before forcing Plaintiff JANE KB-106 ROE to

1 masturbate him, making skin-to-skin contact. This reoccurred two (2) more
2 occasions in the beginning of 2014 and then a dozen or more times
3 thereafter.

4 iv. Out of fear of retaliation and further confinement, Plaintiff JANE KB-106
5 ROE never reported the sexual misconduct assuming the complaints would
6 be unanswered, dismissed, ignored, and bury without investigation or
7 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
8 KB-106 ROE was systematically and consistently sexually abused in the
9 “safe haven” environment created and controlled by Defendants
10 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

11 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE KB-
12 106 OE has experienced ongoing and persistent mental, emotional and
13 psychological problems, including, but not limited to: anxiety and post-
14 traumatic stress disorder; depression; feelings of helplessness; insomnia,
15 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
16 difficulty in meaningfully interacting with others and intimate relationships;
17 loss of trust and control issues with any persons in a position of authority
18 and trust; loss of trust for and fear of police officers and men; flashbacks
19 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
20 and loss of enjoyment of life, among others.

21 cccc. **JANE ZB-107 ROE:**

22 i. Plaintiff JANE ZB-107 ROE is a female, born on 3/1/1976, who was
23 sexually abused in or around 2014 when the sexual misconduct alleged
24 herein occurred at CCWF.

25 ii. Plaintiff JANE ZB-107 ROE was committed to physical mandatory
26 confinement at CCWF where she encountered DOES Correctional Officer
27 Hodges who had unfettered access and control, and used a position of
28 power, trust and authority to sexually abuse and harass Plaintiff JANE ZB-

1 107 ROE under color of authority on behalf of Defendants CALIFORNIA
2 and CDCR, THE ABUSERS, DOES, and each of them.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, DOES Correctional Officer
5 Hodges entered Plaintiff JANE ZB-107 ROE'S cell and told Plaintiff JANE
6 ZB-107 ROE that he would pay her for sexual intercourse. Plaintiff JANE
7 ZB-107 ROE declined. However, DOES Correctional Officer Hodges then
8 groped Plaintiff JANE ZB-107 ROE'S breasts, vagina, and buttocks
9 underneath her clothes anyways. Then, DOES Correctional Officer Hodges
10 gave Plaintiff JANE ZB-107 ROE cigarettes and fast food to bribe Plaintiff
11 JANE ZB-107 ROE and keep her quiet about the sexual abuse, threatening
12 to harm Plaintiff JANE ZB-107 ROE as well if she told anyone.

13 iv. Out of fear of retaliation and further confinement, Plaintiff JANE ZB-107
14 ROE never reported the sexual misconduct assuming the complaints would
15 be unanswered, dismissed, ignored, and bury without investigation or
16 redress thereby allowing the sexual misconduct to continue, particularly
17 because of DOES Correctional Officer Hodges threatening to harm Plaintiff
18 JANE ZB-107 ROE if she reported, as well as the idea that no one would
19 believe Plaintiff JANE ZB-107 ROE and reporting would cause her to be in
20 segregation. Plaintiff JANE ZB-107 ROE was systematically and
21 consistently sexually abused in the "safe haven" environment created and
22 controlled by Defendants CALIFORNIA and CDCR, THE ABUSERS,
23 DOES, and each of them.

24 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE ZB-
25 107 ROE has experienced ongoing and persistent mental, emotional and
26 psychological problems, including, but not limited to: anxiety and post-
27 traumatic stress disorder; depression; feelings of helplessness; insomnia,
28 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;

1 difficulty in meaningfully interacting with others and intimate relationships;
2 loss of trust and control issues with any persons in a position of authority
3 and trust; loss of trust for and fear of police officers and men; flashbacks
4 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
5 and loss of enjoyment of life, among others.

6 dddddd. **JANE MM-108 ROE:**

- 7 i. Plaintiff JANE MM-108 ROE is a female, born on 8/30/1999, who was
8 sexually abused in or around 2020 when the sexual misconduct alleged
9 herein occurred at CCWF.
- 10 ii. Plaintiff JANE MM-108 ROE was committed to physical mandatory
11 confinement at CCWF where she encountered DOES Deputy Hernandez
12 who had unfettered access and control, and used a position of power, trust
13 and authority to sexually abuse and harass Plaintiff JANE MM-108 ROE
14 under color of authority on behalf of Defendants CALIFORNIA and
15 CDCR, THE ABUSERS, DOES, and each of them.
- 16 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
17 means that would justify the sexual misconduct, DOES Deputy Hernandez
18 began flirting with Plaintiff JANE MM-108 ROE, which then led to the first
19 incident of sexual abuse whereby DOES Deputy Hernandez told Plaintiff
20 JANE MM-108 ROE that she had nice breasts. DOES Deputy Hernandez
21 proceeded to lift up Plaintiff JANE MM-108 ROE'S shirt and take out
22 Plaintiff JANE MM-108 ROE'S breasts very aggressively before fondling
23 her breasts skin-to-skin. On many other occasions, DOES Deputy
24 Hernandez touched Plaintiff JANE MM-108 ROE'S breasts as well as her
25 buttocks. Thereafter, near the entrance of the nurse's office, DOES Deputy
26 Hernandez stood close to Plaintiff JANE MM-108 ROE and rubbed his
27 body on Plaintiff JANE MM-108 ROE'S body and smacked Plaintiff JANE
28 MM-108 ROE'S buttocks while she passed. On another occasion, DOES

1 Deputy Hernandez put his penis on a window to show the print of his penis
2 so Plaintiff JANE MM-108 ROE could see.

3 iv. Out of fear of retaliation and further confinement, Plaintiff JANE MM-108
4 ROE never reported the sexual misconduct assuming the complaints would
5 be unanswered, dismissed, ignored, and buried without investigation or
6 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
7 MM-108 ROE was systematically and consistently sexually abused in the
8 “safe haven” environment created and controlled by Defendants
9 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

10 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE MM-
11 108 ROE has experienced ongoing and persistent mental, emotional and
12 psychological problems, including, but not limited to: anxiety; depression;
13 feelings of helplessness; insomnia, questioning of sexual identity; lowered
14 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
15 with others and intimate relationships; loss of trust and control issues with
16 any persons in a position of authority and trust; loss of trust for and fear of
17 police officers and men; flashbacks and intrusive thoughts; stress;
18 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
19 among others.

20 eeeee. **JANE KL-109ROE:**

21 i. Plaintiff JANE KL-109 ROE is a female, born on 12/2/1983, who was
22 sexually abused in or around 2015 to 2018 when the sexual misconduct
23 alleged herein occurred at CCWF.

24 ii. Plaintiff JANE KL-109 ROE was committed to physical mandatory
25 confinement at CCWF where she encountered Defendant Correctional
26 Officer Israel Trevino and DOES Correctional Officer Alvarez who had
27 unfettered access and control, and used a position of power, trust and
28 authority to sexually abuse and harass Plaintiff JANE KL-109 ROE under

1 color of authority on behalf of Defendants CALIFORNIA and CDCR, THE
2 ABUSERS, DOES, and each of them.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, Defendant Correctional
5 Officer Trevino reached inside Plaintiff JANE KL-109 ROE'S pants and
6 fondled and digitally penetrated Plaintiff JANE KL-109 ROE'S vagina with
7 his bare fingers. Defendant Correctional Officer Trevino also forced
8 Plaintiff JANE KL-109 ROE to perform oral copulation on him several
9 times. This sexual abuse occurred on Fridays and, during the abuse,
10 Defendant Correctional Officer Trevino told Plaintiff JANE KL-109 ROE
11 not to say anything, and also gave Plaintiff JANE KL-109 ROE special
12 treatment such as tobacco. Further, DOES Correctional Officer Padilla
13 entered Plaintiff JANE KL-109 ROE'S cell at night and fondled Plaintiff
14 JANE KL-109 ROE'S vagina on two (2) occasions, giving Plaintiff JANE
15 KL-109 ROE special treatment in the interim such as food at night. Lastly,
16 DOES Correctional Officer Alvarez took Plaintiff JANE KL-109 ROE from
17 the kitchen where she worked to the janitor's room. During this time, DOES
18 Correctional Officer tried to bribe Plaintiff JANE KL-109 ROE in exchange
19 for sexual favors and made sexual comments toward Plaintiff JANE KL-
20 109 ROE repeatedly.

21 iv. Out of fear of retaliation and further confinement, Plaintiff JANE KL-109
22 ROE never reported the sexual misconduct assuming the complaints would
23 be unanswered, dismissed, ignored, and bury without investigation or
24 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
25 KL-109 ROE was systematically and consistently sexually abused in the
26 "safe haven" environment created and controlled by Defendants
27 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE KL-
2 109 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety and post-
4 traumatic stress disorder; depression; feelings of helplessness; insomnia,
5 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
6 difficulty in meaningfully interacting with others and intimate relationships;
7 loss of trust and control issues with any persons in a position of authority
8 and trust; loss of trust for and fear of police officers and men; flashbacks
9 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
10 and loss of enjoyment of life, among others.

11 ffff. **JANE SA-110 ROE:**

- 12 i. Plaintiff JANE SA-110 ROE is a female, born on 3/30/1989, who was
13 sexually abused in or around 2017 when the sexual misconduct alleged
14 herein occurred at CCWF.
- 15 ii. Plaintiff JANE SA-110 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered DOES Correctional Officer
17 Avalos who had unfettered access and control, and used a position of power,
18 trust, and authority to sexually abuse and harass Plaintiff JAN SA-110 ROE
19 under color of authority on behalf of Defendants CALIFORNIA and
20 CDCR, THE ABUSERS, DOES, and each of them.
- 21 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
22 means that would justify the sexual misconduct, DOES Correctional Officer
23 Avalos began making sexual comments toward Plaintiff JANE SA-110
24 ROE such as “Mmmm, can I get that?” and “what is underneath your
25 clothes?” Thereafter, things escalated to the point that DOES Correctional
26 Officer Avalos rubbed his body against Plaintiff JANE SA-110 ROE and
27 grabbed Plaintiff JANE SA-110 ROE’s body in the hallway, in her cell, and
28 in the laundromat, including but not limited to Plaintiff JANE SA-110

1 ROE’S breasts, vagina, and buttocks, while making sexual comments to
2 Plaintiff JANE SA-110 ROE.

3 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SA-110
4 ROE never reported the sexual misconduct assuming the complaints would
5 be unanswered, dismissed, ignored, and bury without investigation or
6 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
7 SA-110 ROE was systematically and consistently sexually abused in the
8 “safe haven” environment created and controlled by Defendants
9 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

10 v. As a directly and proximate result of the sexual abuse, Plaintiff SA-110
11 ROE has experienced ongoing and persistent mental, emotional and
12 psychological problems, including, but not limited to: anxiety; depression;
13 feelings of helplessness; insomnia, questioning of sexual identity; lowered
14 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
15 with others and intimate relationships; loss of trust and control issues with
16 any persons in a position of authority and trust; loss of trust for and fear of
17 police officers and men; flashbacks and intrusive thoughts; stress;
18 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
19 among others.

20 ggggg. **JANE LA-111 ROE:**

21 i. Plaintiff JANE LA-111 ROE is a female, born on 6/21/1982, who was
22 sexually abused in or around 2016 when the sexual misconduct alleged
23 herein occurred at CCWF.

24 ii. Plaintiff JANE LA-111 ROE was committed to physical mandatory
25 confinement at CCWF where she encountered DOES Correctional Officer
26 Smithy who had unfettered access and control, and used a position of power,
27 trust, and authority to sexually abuse and harass Plaintiff JANE LA-111
28

1 ROE under color of authority on behalf of Defendants CALIFORNIA and
2 CDCR, THE ABUSERS, DOES, and each of them.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, DOES Correctional Officer
5 Smithy, who worked in the 503 tower where he monitored CCWF with a
6 sniper, forced Plaintiff JANE LA-111 ROE into a room and locked the door
7 behind him. At this time, DOES Correctional Officer Smithy then pulled
8 down Plaintiff JANE LA-111 ROE'S pants and raped Plaintiff JANE LA-
9 111 ROE vaginally with his penis. This sexual abuse reoccurred on another
10 occasion and, during these times, DOES Correctional Officer Smithy
11 ejaculated on Plaintiff JANE LA-111 ROE before dismissing her.

12 iv. Out of fear of retaliation and further confinement, Plaintiff JANE LA-111
13 ROE never reported the sexual misconduct assuming the complaints would
14 be unanswered, dismissed, ignored, and bury without investigation or
15 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
16 LA-111 ROE was systematically and consistently sexually abused in the
17 "safe haven" environment created and controlled by Defendants
18 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

19 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE LA-
20 111 ROE has experienced ongoing and persistent mental, emotional and
21 psychological problems, including, but not limited to: anxiety and post-
22 traumatic stress disorder; depression; feelings of helplessness; insomnia,
23 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
24 difficulty in meaningfully interacting with others and intimate relationships;
25 loss of trust and control issues with any persons in a position of authority
26 and trust; loss of trust for and fear of police officers and men; flashbacks
27 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
28 and loss of enjoyment of life, among others.

1 hhhhh. **JANE ML-112 ROE:**

- 2 i. Plaintiff JANE ML-112 ROE is a female, born on 3/21/1995, who was
3 sexually abused in or around 2017 when the sexual misconduct alleged
4 herein occurred at CCWF.
- 5 ii. Plaintiff JANE ML-112 ROE was committed to physical mandatory
6 confinement at CCWF where she encountered Defendant Correctional
7 Officer Arroyo and DOES Correctional Officer Martinez and DOES
8 Correctional Officer Diaz who had unfettered access and control, and used
9 a position of power, trust and authority to sexually abuse and harass Plaintiff
10 JANE ML-112 ROE under color of authority on behalf of Defendants
11 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 12 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
13 means that would justify the sexual misconduct, Defendant Correctional
14 Officer Arroyo entered the nurse's station on approximately four (4)
15 occasions forcing Plaintiff JANE ML-112 ROE to have sexual intercourse
16 with him where he ejaculated in a towel or condom before dismissing
17 Plaintiff JANE ML-112 ROE back to her cell. Defendant Correctional
18 Officer Arroyo gave Plaintiff JANE ML-112 ROE special treatment in
19 exchange for the sexual abuse such as outside food and candy. Further, on
20 approximately ten (10) more occasions, Defendant Correctional Officer
21 Arroyo entered Plaintiff JANE ML-112 ROE'S cell reached underneath
22 Plaintiff JANE ML-112 ROE'S garments and fondled his or her genitalia
23 and Plaintiff JANE ML-112 ROE'S buttocks in exchange for soda, food,
24 candy, and dessert. On another occasion, DOE Correctional Officer
25 Martinez entered Plaintiff JANE ML-112 ROE'S room, handcuffed
26 Plaintiff JANE ML-112 ROE, and pushed Plaintiff JANE ML-112 ROE
27 onto a metal desk where he undressed her and digitally penetrated her
28 vagina. During this time, DOES Correctional Officer Martinez told Plaintiff

1 JANE ML-112 ROE how “tight” her vagina was and kept inserting more
2 fingers into her vagina during the abuse, which was extremely painful and
3 humiliating. Meanwhile, DOES Correctional Officer Martinez threatened
4 Plaintiff JANE ML-112 ROE with making her life “hell” and prolonging
5 her sentence if she reported the abuse, knowing that Plaintiff JANE ML-
6 112 ROE had almost served all of her time by then. Finally, DOES
7 Correctional Officer Diaz made sexual comments to and about Plaintiff
8 JANE ML-112 ROE, saying things such as, “How do you get her to behave
9 like that?,” “Can I get a turn?,” “Show me how it’s done, I want to know,”
10 and “Can you do that to me.” All in all, the sexual abuse at CCWF occurred
11 approximately sixteen (16) times.

12 iv. Out of fear of retaliation and further confinement, Plaintiff JANE ML-112
13 ROE never reported the sexual misconduct assuming the complaints would
14 be unanswered, dismissed, ignored, and bury without investigation or
15 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
16 ML-112 ROE was systematically and consistently sexually abused in the
17 “safe haven” environment created and controlled by Defendants
18 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

19 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE ML-
20 112 ROE has experienced ongoing and persistent mental, emotional and
21 psychological problems, including, but not limited to: anxiety; depression;
22 feelings of helplessness; insomnia, questioning of sexual identity; lowered
23 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
24 with others and intimate relationships; loss of trust and control issues with
25 any persons in a position of authority and trust; loss of trust for and fear of
26 police officers and men; flashbacks and intrusive thoughts; stress;
27 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
28 among others.

1 iiii. **JANE AC-113 ROE:**

2 i. Plaintiff JANE AC-113 ROE is a female, born on 5/10/1976, who was
3 sexually abused in or around 2012 to 2016 when the sexual misconduct
4 alleged herein occurred at CCWF.

5 ii. Plaintiff JANE AC-113 ROE was committed to physical mandatory
6 confinement at CCWF where she encountered DOES Correctional Officer
7 Denzel and DOES Correctional Officer Youngblood who had unfettered
8 access and control, and used a position of power, trust and authority to
9 sexually abuse and harass Plaintiff JANE AC-113 ROE under color of
10 authority on behalf of Defendants CALIFORNIA and CDCR, THE
11 ABUSERS, DOES, and each of them.

12 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
13 means that would justify the sexual misconduct, DOES Correctional Officer
14 Denzel patted down Plaintiff JANE AC-113 ROE while she was in her cell
15 before lifting up Plaintiff JANE AC-113 ROE’S gown and groping Plaintiff
16 JANE AC-113 ROE’S body. DOES Correctional Officer Denzel then asked
17 Plaintiff JANE AC-113 ROE to perform oral copulation on him, but
18 Plaintiff JANE AC-113 ROE refused. DOES Correctional Officer Denzel
19 then digitally penetrated Plaintiff JANE AC-113 ROE’S vagina while
20 telling her to be quiet or she would be sent to the hole. DOES Correctional
21 Officer Denzel then rubbed his genitals on Plaintiff JANE AC-113 ROE’S
22 body while grabbing her breasts underneath her clothes. DOES Correctional
23 Officer Denzel also forced Plaintiff JANE AC-113 ROE to digitally
24 penetrate herself in front of him, threatening Plaintiff JANE AC-113 ROE
25 by saying, “You gonna go to the hole if you don’t do it.” Additionally,
26 DOES Correctional Officer Denzel flashed a flashlight into Plaintiff JANE
27 AC-113 ROE’S cell, requiring Plaintiff JANE AC-113 ROE to expose a
28 naked body part. If Plaintiff JANE AC-113 ROE did not comply, DOES

1 Correctional Denzel threatened to place Plaintiff JANE AC-113 ROE in
2 solitary confinement. The abuse before DOES Correctional Officer Denzel
3 occurred approximately ten (10) times. Furthermore, on another six (6)
4 occasions, DOES Correctional Officer Youngblood stared at Plaintiff JANE
5 AC-113 ROE while in her room or in the shower before forcing Plaintiff
6 JANE AC-113 ROE to kiss another inmate, digitally penetrate another
7 roommate’s vagina, grope another inmate, or lick another inmate’s breasts
8 or vice versa so he could relieve himself by ejaculating. Meanwhile, DOES
9 Correctional Officer Youngblood threatened Plaintiff JANE AC-113 ROE
10 with a room change or being placed in solitary confinement so Plaintiff
11 JANE AC-113 ROE complied.

12 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AC-113
13 ROE never reported the sexual misconduct assuming the complaints would
14 be unanswered, dismissed, ignored, and bury without investigation or
15 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
16 AC-113 ROE was systematically and consistently sexually abused in the
17 “safe haven” environment created and controlled by Defendants
18 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

19 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AC-
20 113 ROE has experienced ongoing and persistent mental, emotional and
21 psychological problems, including, but not limited to: anxiety and post-
22 traumatic stress disorder; depression; feelings of helplessness; insomnia,
23 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
24 difficulty in meaningfully interacting with others and intimate relationships;
25 loss of trust and control issues with any persons in a position of authority
26 and trust; loss of trust for and fear of police officers and men; flashbacks
27 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
28 and loss of enjoyment of life, among others.

1 **jjjj. JANE NN-114 ROE:**

- 2 i. Plaintiff JANE NN-114 ROE is a female, born on 4/6/1982, who was
3 sexually abused in or around 2014 when the sexual misconduct alleged
4 herein occurred at CCWF.
- 5 ii. Plaintiff JANE NN-114 ROE was committed to physical mandatory
6 confinement at CCWF where she encountered DOES Correctional Officer
7 Alvarez who had unfettered access and control, and used a position of
8 power, trust and authority to sexually abuse and harass Plaintiff JANE NN-
9 114 ROE under color of authority on behalf of Defendants CALIFORNIA
10 and CDCR, THE ABUSERS, DOES, and each of them.
- 11 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
12 means that would justify the sexual misconduct, DOES Correctional Officer
13 Alvarez began interrogating Plaintiff JANE NN-114 ROE about why she
14 was at CCWF, which progressed to DOES Correctional Officer Alvarez
15 groping and fondling Plaintiff JANE NN-114 ROE skin-to-skin. DOES
16 Correctional Officer Alvarez next began following Plaintiff JANE NN-114
17 ROE into various locations such as a broom closet where he would rub his
18 body against Plaintiff JANE NN-114 ROE'S buttocks and put his hands
19 inside Plaintiff JANE NN-114 ROE'S shirt and pinch Plaintiff JANE NN-
20 114 ROE'S nipples skin-to-skin. At one point, Plaintiff JANE NN-114 ROE
21 wrote a letter before reading it aloud to DOES Correctional Officer Alvarez
22 about how bad the sexual abuse made her feel, which fortunately made
23 DOES Correctional Officer Alvarez stop further abuse of Plaintiff JANE
24 NN-114 ROE.
- 25 iv. Out of fear of retaliation and further confinement, Plaintiff JANE NN-114
26 ROE never reported the sexual misconduct, outside of telling DOES
27 Correctional Alvarez directly, assuming the complaints would be
28 unanswered, dismissed, ignored, and bury without investigation or redress

1 thereby allowing the sexual misconduct to continue. Plaintiff JANE NN-
2 114 ROE was systematically and consistently sexually abused in the “safe
3 haven” environment created and controlled by Defendants CALIFORNIA
4 and CDCR, THE ABUSERS, DOES, and each of them.

- 5 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE NN-
6 114 ROE has experienced ongoing and persistent mental, emotional and
7 psychological problems, including, but not limited to: anxiety; depression;
8 feelings of helplessness; insomnia, questioning of sexual identity; lowered
9 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
10 with others and intimate relationships; loss of trust and control issues with
11 any persons in a position of authority and trust; loss of trust for and fear of
12 police officers and men; flashbacks and intrusive thoughts; stress;
13 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
14 among others.

15 kkkkk. **JANE TT-115 ROE:**

- 16 i. Plaintiff JANE TT-115 ROE is a female, born on 11/26/1996, who was
17 sexually abused in or around 2017 to 2018 when the sexual misconduct
18 alleged herein occurred at CCWF.
- 19 ii. Plaintiff JANE TT-115 ROE was committed to physical mandatory
20 confinement at CCWF where she encountered Defendant Correctional
21 Officer Jeffrey Mullen who had unfettered access and control, and used a
22 position of power, trust, and authority to sexually abuse and harass Plaintiff
23 JANE TT-115 ROE under color of authority on behalf of Defendants
24 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 25 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
26 means that would justify the sexual misconduct, Defendant Correctional
27 Officer Mullen pulled Plaintiff JANE TT-115 ROE out of the chow (i.e.,
28 kitchen) line and said, “What are you doing here? You look like a porn star,

1 and you got a porn star name.” Defendant Correctional Officer Mullen then
2 spanked Plaintiff JANE TT-115 ROE’S buttocks and told her to get back to
3 chow. The sexual abuse continued to the point Defendant Correctional
4 Officer Mullen forced Plaintiff JANE TT-115 ROE to masturbate his penis
5 until he ejaculated in a tissue or on Plaintiff JANE TT-115 ROE’S body.
6 Defendant Correctional Officer Mullen also raped Plaintiff JANE TT-115
7 ROE in a closet when he forced his penis into Plaintiff JANE TT-115
8 ROE’S vagina. Defendant Correctional Officer Mullen also forced Plaintiff
9 JANE TT-115 ROE to grind her buttocks on his penis and fondled Plaintiff
10 JANE TT-115 ROE’S breasts. During other occasions, Defendant
11 Correctional Officer Mullen made Plaintiff JANE TT-115 ROE give him
12 oral copulation. Plaintiff JANE TT-115 ROE was expected, of Defendant
13 Correctional Officer Mullen, to be changing her clothes in front of him or
14 show him Plaintiff JANE TT-115 ROE’S naked body as he passed by her
15 cell at nighttime. Defendant Correctional Officer Mullen expected a
16 relationship with Plaintiff JANE TT-115 ROE once she got out of CCWF.
17 In exchange for the sexual abuse, Defendant Correctional Officer Mullen
18 gave Plaintiff JANE TT-115 ROE special treatment including, but not
19 limited to, cologne, extra phone calls, products from Victoria’s Secret,
20 cigarettes, MAC lipstick, outside food, and chocolate covered strawberries
21 for Valentine’s Day.

22 iv. Plaintiff JANE TT-115 ROE reported the sexual misconduct and the facility
23 proceeded to drag Plaintiff JANE TT-115 ROE out of her cell at
24 approximately 5:00 a.m., forcing Plaintiff JANE TT-115 ROE to do a
25 pregnancy test, and then shipped Plaintiff JANE TT-115 ROE off to CIW.
26 Plaintiff JANE TT-115 ROE was also placed in solitary confinement where
27 she could not speak with anyone for approximately 21 days, and had to beg
28 for a shower.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE TT-
2 115 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety and post-
4 traumatic stress disorder; depression; feelings of helplessness; insomnia,
5 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
6 difficulty in meaningfully interacting with others and intimate relationships;
7 loss of trust and control issues with any persons in a position of authority
8 and trust; loss of trust for and fear of police officers and men; flashbacks
9 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
10 and loss of enjoyment of life, among others.

11 IIIII. **JANE HT-116 ROE:**

- 12 i. Plaintiff JANE HT-116 ROE is a female, born on 8/5/1968, who was
13 sexually abused in or around 2020 when the sexual misconduct alleged
14 herein occurred at CCWF.
- 15 ii. Plaintiff JANE HT-116 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered Defendant Sergeant
17 Fernando Garcia Jr. who had unfettered access and control, and used a
18 position of power, trust and authority to sexually abuse and harass Plaintiff
19 JANE HT-116 ROE under color of authority on behalf of Defendants
20 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 21 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
22 means that would justify the sexual misconduct, Defendant Sergeant Garcia
23 asked Plaintiff JANE HT-116 ROE to come to an office where he ultimately
24 pulled Plaintiff JANE HT-116 ROE close to him, unzipped his pants, pulled
25 out his penis, and pushed Plaintiff JANE HT-116 ROE onto her knees
26 telling Plaintiff JANE HT-116 ROE to “suck it.” Plaintiff JANE HT-116
27 ROE complied and performed oral copulation on Defendant Sergeant
28 Garcia until he ejaculated in a condom and disposed of the condom

1 thereafter. Defendant Sergeant Garcia also aggressively groped Plaintiff
2 JANE HT-116 ROE underneath her clothing whenever he had the chance,
3 and digitally penetrated Plaintiff JANE HT-116 ROE'S vagina while
4 aggressively groping Plaintiff JANE HT-116 ROE'S buttocks. On another
5 occasion, Defendant Sergeant Garcia almost snatched Plaintiff JANE HT-
6 116 ROE while she passed by a window to engage in further sexual abuse.

7 iv. Out of fear of retaliation and further confinement, Plaintiff JANE HT-116
8 ROE never officially reported the sexual misconduct assuming the
9 complaints would be unanswered, dismissed, ignored, and bury without
10 investigation or redress thereby allowing the sexual misconduct to continue.
11 However, Plaintiff JANE HT-116 ROE did inform Correctional Officer and
12 Warden Polaris, whose first name is unknown at this time, about the sexual
13 abuse and was then directed to a warden who said that nothing could be
14 done in response. Plaintiff JANE HT-116 ROE also told Correctional
15 Officer Brown, whose first name is unknown at this time but who worked
16 in the Investigative Services Unit, about the sexual abuse, but this officer
17 too said that nothing could be done in response. Plaintiff JANE HT-116
18 ROE eventually called CCWF headquarters to file a 602, but nothing was
19 done in response. Plaintiff JANE HT-116 ROE was systematically and
20 consistently sexually abused in the "safe haven" environment created and
21 controlled by Defendants CALIFORNIA and CDCR, THE ABUSERS,
22 DOES, and each of them.

23 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE HT-
24 116 ROE has experienced ongoing and persistent mental, emotional and
25 psychological problems, including, but not limited to: anxiety and post-
26 traumatic stress disorder; depression; feelings of helplessness; insomnia,
27 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
28 difficulty in meaningfully interacting with others and intimate relationships;

1 loss of trust and control issues with any persons in a position of authority
2 and trust; loss of trust for and fear of police officers and men; flashbacks
3 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
4 and loss of enjoyment of life, among others.

5 mmmmm. **JANE BC-117 ROE:**

- 6 i. Plaintiff JANE BC-117 ROE is a female, born on 9/28/1993, who was
7 sexually abused in or around 2019 when the sexual misconduct alleged
8 herein occurred at CCWF.
- 9 ii. Plaintiff JANE BC-117 ROE was committed to physical mandatory
10 confinement at CCWF where she encountered DOES Correctional Officer
11 Seagraves who had unfettered access and control, and used a position of
12 power, trust and authority to sexually abuse and harass Plaintiff JANE BC-
13 117 ROE under color of authority on behalf of Defendants CALIFORNIA
14 and CDCR, THE ABUSERS, DOES, and each of them.
- 15 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
16 means that would justify the sexual misconduct, DOES Correctional Officer
17 Seagraves called Plaintiff JANE BC-117 ROE out of her cell and into the
18 officers' desk where he told Plaintiff JANE BC-117 ROE that he wanted
19 her to be good and, if she told anyone about any abuse that would soon
20 ensue, he would make sure Plaintiff JANE BC-117 ROE was never released
21 from CCWF. DOES Correctional Officer Seagraves then made Plaintiff
22 JANE BC-117 ROE perform oral copulation on him, which was so
23 aggressive that Plaintiff JANE BC-117 ROE threw up. On other occasions,
24 DOES Correctional Officer Seagraves took Plaintiff JANE BC-117 ROE to
25 a restroom or found her in the kitchen when she was on duty, put his hand
26 under Plaintiff JANE BC-117 ROE'S shirt and bra, and groped Plaintiff
27 JANE BC-117 ROE'S breasts and pinched her nipples very hard. DOES
28 Correctional Officer Seagraves also forcefully put his hand down Plaintiff

1 JANE BC-117 ROE’S pants and digitally penetrated Plaintiff JANE BC-
2 117 ROE’S vagina and anus. On other occasions, in the same locations,
3 DOES Correctional Officer Seagraves raped Plaintiff JANE BC-117 ROE
4 vaginally and sodomized her, ejaculating in Plaintiff JANE BC-117 ROE’S
5 anus. During the sexual assault, which was extremely violent, DOES
6 Correctional Officer Seagraves threatened Plaintiff JANE BC-117 ROE
7 with extra time in prison, saying he would blame Plaintiff JANE BC-117
8 ROE for drug possession. The sexual abuse occurred approximately 40 to
9 50 times. Additionally, Plaintiff JANE BC-117 ROE witnessed DOES
10 Correctional Officer Seagraves grope another inmate’s buttocks, close to
11 her vagina.

12 iv. Out of fear of retaliation and further confinement, Plaintiff JANE BC-117
13 ROE never reported the sexual misconduct assuming the complaints would
14 be unanswered, dismissed, ignored, and bury without investigation or
15 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
16 BC-117 ROE was systematically and consistently sexually abused in the
17 “safe haven” environment created and controlled by Defendants
18 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

19 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE BC-
20 117 ROE has experienced ongoing and persistent mental, emotional and
21 psychological problems, including, but not limited to: anxiety and post-
22 traumatic stress disorder; depression; feelings of helplessness; insomnia,
23 questioning of sexual identity; lowered self-esteem; moodiness; drug abuse;
24 difficulty in meaningfully interacting with others and intimate relationships;
25 loss of trust and control issues with any persons in a position of authority
26 and trust; loss of trust for and fear of police officers and men; flashbacks
27 and intrusive thoughts; stress; nervousness; fear; embarrassment; shame;
28 and loss of enjoyment of life, among others.

1 nnnnn. **JANE AW-118 ROE**

2 i. Plaintiff JANE AW-118 ROE is a female, born on 12/9/1988, who was
3 sexually abused in or around 2020 when the sexual misconduct alleged
4 herein occurred at CCWF.

5 ii. Plaintiff JANE AW-118 ROE was committed to physical mandatory
6 confinement at CCWF where she encountered DOES Correctional Officer
7 Bronco who had unfettered access and control, and used a position of
8 power, trust and authority to sexually abuse and harass Plaintiff JANE AW-
9 118 ROE under color of authority on behalf of Defendants CALIFORNIA
10 and CDCR, THE ABUSERS, DOES, and each of them.

11 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
12 means that would justify the sexual misconduct, DOES Correctional Officer
13 Bronco approached Plaintiff JANE AW-118 ROE while she was cleaning a
14 restroom, put his hand under Plaintiff JANE AW-118 ROE'S shirt, and
15 grobed her breasts skin-to-skin. DOES Correctional Officer Bronco also
16 rubbed his body against Plaintiff JANE AW-118 ROE and also put his hand
17 under Plaintiff JANE AW-118 ROE'S shirt while she was cleaning a
18 restroom. When Plaintiff JANE AW-118 ROE told DOES Correctional
19 Officer Bronco to stop, he became aggressive; Plaintiff JANE AW-118
20 ROE tried to remove DOES Correctional Officer Bronco's arm off Plaintiff
21 her breast, for instance, but he would grab Plaintiff JANE AW-118 ROE
22 closer and tell Plaintiff JANE AW-118 ROE not to say anything. This abuse
23 occurred approximately six (6) times. Meanwhile, DOES Correctional
24 Officer Bronco threatened Plaintiff JANE AW-118 ROE with the loss of
25 her job or embarrassment.

26 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AW-118
27 ROE never reported the sexual misconduct assuming the complaints would
28 be unanswered, dismissed, ignored, and bury without investigation or

1 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
2 AW-118 ROE was systematically and consistently sexually abused in the
3 “safe haven” environment created and controlled by Defendants
4 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 5 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AW-
6 118 ROE has experienced ongoing and persistent mental, emotional and
7 psychological problems, including, but not limited to: anxiety; depression;
8 feelings of helplessness; insomnia, questioning of sexual identity; lowered
9 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
10 with others and intimate relationships; loss of trust and control issues with
11 any persons in a position of authority and trust; loss of trust for and fear of
12 police officers and men; flashbacks and intrusive thoughts; stress;
13 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
14 among others.

15 ooooo. **JANE JA-119 ROE:**

- 16 i. Plaintiff JANE JA-119 ROE is a female, born on 7/6/1989, who was
17 sexually abused in or around 2014 or 2015 when the sexual misconduct
18 alleged herein occurred at CCWF.
- 19 ii. Plaintiff JANE JA-119 ROE was committed to physical mandatory
20 confinement at CCWF where she encountered Defendant Correctional
21 Officer Israel Trevino who had unfettered access and control, and used a
22 position of power, trust and authority to sexually abuse and harass Plaintiff
23 JANE JA-119 ROE under color of authority on behalf of Defendants
24 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 25 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
26 means that would justify the sexual misconduct, Defendant Correctional
27 Officer Trevino went to open a maintenance room for Plaintiff JANE JA-
28 119 ROE who was working as a porter at the time along with another

1 inmate. Defendant Correctional Officer Trevino let Plaintiff JANE JA-119
2 ROE enter the room and pass him to get Plaintiff JANE JA-119 ROE'S
3 tools. As Plaintiff JANE JA-119 ROE walked in, however, Defendant
4 Correctional Officer Trevino approached Plaintiff JANE JA-119 ROE from
5 behind and groped Plaintiff JANE JA-119 ROE, putting one hand inside
6 Plaintiff JANE JA-119 ROE'S shirt and groping her breast. Meanwhile,
7 Defendant Correctional Officer Trevino's other hand grabbed Plaintiff
8 JANE JA-119 ROE'S body. In response, Plaintiff JANE JA-119 ROE
9 panicked and she hit Defendant Correctional Officer Trevino with her
10 elbow as she yelled, "What the heck!" Defendant Correctional Officer
11 Trevino panicked himself and let Plaintiff JANE JA-119 ROE go. Plaintiff
12 JANE JA-119 ROE informed her mother later that night abuse the sexual
13 abuse.

14 iv. Out of fear of retaliation and further confinement, Plaintiff JANE JA-119
15 ROE never reported the sexual misconduct assuming the complaints would
16 be unanswered, dismissed, ignored, and bury without investigation or
17 redress thereby allowing the sexual misconduct to continue, aside from
18 informing her mother as stated above. Plaintiff JANE JA-119 ROE was
19 systematically and consistently sexually abused in the "safe haven"
20 environment created and controlled by Defendants CALIFORNIA and
21 CDCR, THE ABUSERS, DOES, and each of them.

22 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE JA-
23 119 ROE has experienced ongoing and persistent mental, emotional and
24 psychological problems, including, but not limited to: anxiety; depression;
25 feelings of helplessness; insomnia, questioning of sexual identity; lowered
26 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
27 with others and intimate relationships; loss of trust and control issues with
28 any persons in a position of authority and trust; loss of trust for and fear of

1 police officers and men; flashbacks and intrusive thoughts; stress;
2 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
3 among others.

4 ppppp. **JANE KJ-120 ROE:**

- 5 i. Plaintiff JANE KJ-120 ROE is a female, born on 1/11/1989, who was
6 sexually abused in or around 2015 when the sexual misconduct alleged
7 herein occurred at CCWF.
- 8 ii. Plaintiff JANE KJ-120 ROE was committed to physical mandatory
9 confinement at CCWF where she encountered Defendant Correctional
10 Officer Gregory Rodriguez who had unfettered access and control, and used
11 a position of power, trust and authority to sexually abuse and harass Plaintiff
12 JANE KJ-120 ROE under color of authority on behalf of Defendants
13 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 14 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
15 means that would justify the sexual misconduct, Defendant Correctional
16 Officer Rodriguez began calling Plaintiff JANE KJ-120 ROE beautiful
17 while letting her work as a porter and perform duties such as cleaning floors.
18 However, Defendant Correctional Officer Rodriguez proceeded to get
19 closer to Plaintiff JANE KJ-120 ROE while in a cleaning closet, and
20 cornered Plaintiff JANE KJ-120 ROE against a wall, putting his face close
21 to hers so she could feel Defendant Correctional Officer Rodriguez
22 breathing. Defendant Correctional Officer Rodriguez then touched Plaintiff
23 JANE KJ-120 ROE'S bare breasts and put his hand in Plaintiff JANE KJ-
24 120 ROE'S pants before digitally penetrating Plaintiff JANE KJ-120
25 ROE'S vagina. On another occasion, a few days after the first, in the same
26 cleaning closet, Defendant Correctional Officer Rodriguez began talking
27 sexually to Plaintiff JANE KJ-120 ROE, asking her how long it had been
28 since she had been touched and also asked Plaintiff JANE KJ-120 ROE how

1 bad she wanted it. Defendant Correctional Officer Rodriguez next turned
2 Plaintiff JANE KJ-120 ROE around, kissed Plaintiff JANE KJ-120 ROE'S
3 neck, pulled her pants down, and penetrated Plaintiff JANE KJ-120 ROE'S
4 vagina with his penis—without a condom—and ejaculated inside Plaintiff
5 JANE KJ-120 ROE'S vagina. Plaintiff JANE KJ-120 ROE then showered.
6 The sexual intercourse occurred about ten (10) times. During these
7 occasions, Defendant Correctional Officer Rodriguez would either ejaculate
8 inside Plaintiff JANE KJ-120 ROE'S vagina or on the floor, making
9 Plaintiff JANE KJ-120 ROE clean the floor thereafter. Subsequently, in the
10 same cleaning closet, Defendant Correctional Officer Rodriguez pushed
11 Plaintiff JANE KJ-120 ROE'S shirt up and sucked on Plaintiff JANE KJ-
12 120 ROE'S chest before taking Plaintiff JANE KJ-120 ROE'S pants off,
13 lifting up Plaintiff JANE KJ-120 ROE'S leg, and performing oral sex on
14 Plaintiff JANE KJ-120 ROE before having sexual intercourse with Plaintiff
15 JANE KJ-120 ROE. Plaintiff JANE KJ-120 ROE also performed oral
16 copulation on Plaintiff JANE KJ-120 ROE. During all relevant times in
17 which the aforementioned sexual abuse occurred, once the sexual abuse
18 occurred, Plaintiff JANE KJ-120 ROE received special treatment from
19 Defendant Correctional Officer Rodriguez including snacks, chips, soda,
20 and fast food. Defendnat Correctional Officer Rodriguez also let Plaintiff
21 JANE KJ-120 ROE use the phone once in awhile.

22 iv. Out of fear of retaliation and further confinement, Plaintiff JANE KJ-120
23 ROE never reported the sexual misconduct assuming the complaints would
24 be unanswered, dismissed, ignored, and bury without investigation or
25 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
26 KJ-120 ROE was systematically and consistently sexually abused in the
27 “safe haven” environment created and controlled by Defendants
28 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE KJ-
2 120 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
6 with others and intimate relationships; loss of trust and control issues with
7 any persons in a position of authority and trust; loss of trust for and fear of
8 police officers and men; flashbacks and intrusive thoughts; stress;
9 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
10 among others.

11 qqqqq. **JANE RD-121 ROE:**

- 12 i. Plaintiff JANE RD-121 ROE is a female, born on 12/21/1978, who was
13 sexually abused in or around 2014 when the sexual misconduct alleged
14 herein occurred at CCWF.
- 15 ii. Plaintiff JANE RD-121 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered DOES Correctional Officer
17 Lavine and DOES Correctional Officer Rhodes who had unfettered access
18 and control, and used a position of power, trust and authority to sexually
19 abuse and harass Plaintiff JANE RD-121 ROE under color of authority on
20 behalf of Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES,
21 and each of them.
- 22 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
23 means that would justify the sexual misconduct, DOES Correctional Officer
24 Lavine groped Plaintiff JANE RD-121 ROE’S breasts while she wearing a
25 medical gown, without undergarments, in “805” due to a low blood sugar
26 attack rendering her unconscious. DOES Correctional Officer Lavine then
27 rubbed Plaintiff JANE RD-121 ROE’S legs, making his way up to her
28 vagina and next fondled her bare vagina. DOES Correctional Officer Lavine

1 possibly digitally penetrated Plaintiff JANE RD-121 ROE’S vagina during
2 this time, but she cannot recall for certain because of her medical condition
3 at the time. In exchange for the sexual abuse, DOES Correctional Officer
4 Lavine gave Plaintiff JANE RD-121 ROE special treatment such as
5 allowing her to leave work early. On another occasion, DOES Correctional
6 Officer Rhodes approached Plaintiff JANE RD-121 ROE and told Plaintiff
7 JANE RD-121 ROE that she could give him oral copulation and no one
8 would see because there were no cameras in the area. DOES Correctional
9 Officer Rhodes then pulled out his penis that was in his hand while he was
10 touching himself. DOES Correctional Officer Rhodes then asked Plaintiff
11 JANE RD-121 ROE if she liked what she saw (i.e., his penis). Plaintiff
12 JANE RD-121 ROE responded, “No,” and managed to escape before
13 performing oral copulation on DOES Correctional Officer Rhodes.

14 iv. Out of fear of retaliation and further confinement, Plaintiff JANE RD-121
15 ROE never reported the sexual misconduct assuming the complaints would
16 be unanswered, dismissed, ignored, and bury without investigation or
17 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
18 RD-121 ROE was systematically and consistently sexually abused in the
19 “safe haven” environment created and controlled by Defendants
20 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

21 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE RD-
22 121 ROE has experienced ongoing and persistent mental, emotional and
23 psychological problems, including, but not limited to: anxiety; depression;
24 feelings of helplessness; insomnia, questioning of sexual identity; lowered
25 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
26 with others and intimate relationships; loss of trust and control issues with
27 any persons in a position of authority and trust; loss of trust for and fear of
28 police officers and men; flashbacks and intrusive thoughts; stress;

1 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
2 among others.

3 rrrrr. **JANE SS-122 ROE:**

- 4 i. Plaintiff JANE SS-122 ROE is a female, born on 5/7/1987, who was
5 sexually abused in or around 2016 when the sexual misconduct alleged
6 herein occurred at CCWF.
- 7 ii. Plaintiff JANE SS-122 ROE was committed to physical mandatory
8 confinement at CCWF where she encountered DOES Correctional Officer
9 Gutierrez who had unfettered access and control, and used a position of
10 power, trust and authority to sexually abuse and harass Plaintiff JANE SS-
11 122 ROE under color of authority on behalf of Defendants CALIFORNIA
12 and CDCR, THE ABUSERS, DOES, and each of them.
- 13 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
14 means that would justify the sexual misconduct, DOES Correctional Officer
15 Gutierrez began complimenting Plaintiff JANE SS-122 ROE, telling her
16 how beautiful she was and that he wanted to see more of her and get to know
17 her. However, DOES Correctional Officer Gutierrez proceeded, on another
18 day during lock down, to ask Plaintiff JANE SS-122 ROE if he could show
19 Plaintiff JANE SS-122 ROE something. Next, DOES Correctional Officer
20 Gutierrez pulled out his penis and asked Plaintiff JANE SS-122 ROE what
21 she wanted to do with it. DOES Correctional Officer Gutierrez then forced
22 Plaintiff JANE SS-122 ROE to perform oral copulation on him. On another
23 occasion, DOES Correctional Officer Gutierrez was walking around the
24 facility when he demanded that every time he flashed his flashlight, Plaintiff
25 JANE SS-122 ROE must reveal her breasts. DOES Correctional Officer
26 Gutierrez then flashed his flashlight, but Plaintiff JANE SS-122 ROE did
27 not comply with the demand. Accordingly, DOES Correctional Officer
28 Gutierrez threatened Plaintiff JANE SS-122 ROE by saying he would cause

1 her more jail time if she did not comply. Thus, Plaintiff JANE SS-122 ROE
2 began complying and showing her breasts. On another occasion, in the
3 laundry room while doing laundry, DOES Correctional Officer Gutierrez
4 approached Plaintiff JANE SS-122 ROE from behind and groped her body,
5 pulling Plaintiff JANE SS-122 ROE'S hips against his and began saying
6 things like, "If I can bend you have this washer, I would." DOES
7 Correctional Officer Gutierrez then grabbed Plaintiff JANE SS-122 ROE'S
8 hand and placed it on his penis and grabbed Plaintiff JANE SS-122 ROE'S
9 breasts. Furthermore, DOES Correctional Officer Gutierrez entered Plaintiff
10 JANE SS-122 ROE'S cell while she was alone and removed Plaintiff JANE
11 SS-122 ROE'S shirt and bra leaving her in her underwear. DOES
12 Correctional Officer Gutierrez then got into Plaintiff JANE SS-122 ROE'S
13 bed and made Plaintiff JANE SS-122 ROE perform oral copulation on him
14 and a hand job to the point of ejaculation in Plaintiff JANE SS-122 ROE'S
15 hand. During the aforementioned sexual abuse, DOES Correctional Officer
16 Gutierrez threatened Plaintiff JANE SS-122 ROE with more time if she
17 reported the sexual abuse and said he knew where to find her if she told
18 anyone after leaving the facility. DOES Correctional Officer Gutierrez also
19 told Plaintiff JANE SS-122 ROE that no one would ever believe her if she
20 reported the sexual abuse.

- 21 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SS-122
22 ROE never reported the sexual misconduct assuming the complaints would
23 be unanswered, dismissed, ignored, and bury without investigation or
24 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
25 SS-122 ROE was systematically and consistently sexually abused in the
26 "safe haven" environment created and controlled by Defendants
27 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SS-
2 122 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
6 with others and intimate relationships; loss of trust and control issues with
7 any persons in a position of authority and trust; loss of trust for and fear of
8 police officers and men; flashbacks and intrusive thoughts; stress;
9 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
10 among others.

11 sssss. **JANE SP-123 ROE:**

- 12 i. Plaintiff JANE SP-123 ROE is a female, born on 11/10/1975, who was
13 sexually abused in or around 2014 when the sexual misconduct alleged
14 herein occurred at CCWF.
- 15 ii. Plaintiff JANE SP-123 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered DOES Correctional Officer
17 Daryl who had unfettered access and control, and used a position of power,
18 trust and authority to sexually abuse and harass Plaintiff JANE SP-123 ROE
19 under color of authority on behalf of Defendants CALIFORNIA and
20 CDCR, THE ABUSERS, DOES, and each of them.
- 21 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
22 means that would justify the sexual misconduct, DOES Correctional Officer
23 Daryl asked Plaintiff JANE SP-123 ROE to step out of her room to ask
24 smoke screen questions before leading Plaintiff JANE SP-123 ROE into a
25 maintenance closet where he fondled Plaintiff JANE SP-123 ROE'S thighs
26 and breasts skin-to-skin. DOES Correctional Officer Daryl then groped
27 Plaintiff JANE SP-123 ROE'S breasts. This sexual abuse occurred again
28 except DOES Correctional Officer Daryl also fondled Plaintiff JANE SP-

1 123 ROE’S vagina skin-to-skin. On another occasion, in the maintenance
2 closet, DOES Correctional Officer Daryl approached Plaintiff JANE SP-
3 123 ROE and began flirting with her before cornering her against a wall.
4 DOES Correctional Officer Daryl then touched Plaintiff JANE SP-123
5 ROE’S breasts and ran his hand down Plaintiff JANE SP-123 ROE’S arm,
6 grabbing Plaintiff JANE SP-123 ROE’S hand and rubbing it up and down
7 his penis. DOES Correctional Officer Daryl’s penis was erect at the time.
8 DOES Correctional Officer Daryl then rubbed Plaintiff JANE SP-123
9 ROE’S vagina with his fingers skin-to-skin. In exchange for the sexual
10 abuse, DOES Correctional Officer Daryl gave Plaintiff JANE SP-123 ROE
11 special treatment such as cookies.

12 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SP-123
13 ROE never reported the sexual misconduct assuming the complaints would
14 be unanswered, dismissed, ignored, and bury without investigation or
15 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
16 SP-123 ROE was systematically and consistently sexually abused in the
17 “safe haven” environment created and controlled by Defendants
18 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

19 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SP-
20 123 ROE has experienced ongoing and persistent mental, emotional and
21 psychological problems, including, but not limited to: anxiety; depression;
22 feelings of helplessness; insomnia, questioning of sexual identity; lowered
23 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
24 with others and intimate relationships; loss of trust and control issues with
25 any persons in a position of authority and trust; loss of trust for and fear of
26 police officers and men; flashbacks and intrusive thoughts; stress;
27 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
28 among others.

1 **JANE TM-124 ROE:**

- 2 i. Plaintiff JANE TM-124 ROE is a female, born on 6/18/1993, who was
3 sexually abused in or around 2018 when the sexual misconduct alleged
4 herein occurred at CCWF.
- 5 ii. Plaintiff JANE TM-124 ROE was committed to physical mandatory
6 confinement at CCWF where she encountered DOES Lieutenant Pacheco
7 and DOES Captain, whose name Plaintiff JANE TM-124 ROE cannot recall
8 (“DOES Captain”) who had unfettered access and control, and used a
9 position of power, trust and authority to sexually abuse and harass Plaintiff
10 JANE TM-124 ROE under color of authority on behalf of Defendants
11 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 12 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
13 means that would justify the sexual misconduct, DOES Lieutenant Pacheco
14 continuously—nearly daily—summoned Plaintiff JANE TM-124 ROE to
15 his office to purportedly sign disciplinary forms, but instead forced Plaintiff
16 JANE TM-124 ROE to perform oral copulation on him. DOES Lieutenant
17 Pacheco proceeded to rape Plaintiff JANE TM-124 ROE and force Plaintiff
18 JANE TM-124 ROE to have anal sexual intercourse with him. DOES
19 Lieutenant Pacheco threatened Plaintiff JANE TM-124 ROE with
20 prostitution charges if she reported any of the sexual abuse, all of which was
21 skin-to-skin. Meanwhile, DOES Captain also sexually abused Plaintiff
22 JANE TM-124 ROE, forcing Plaintiff JANE TM-124 ROE to perform oral
23 copulation on him and to have sexual intercourse with him too. In fact,
24 DOES Lieutenant Pacheco permitted DOES Captain to use his office for the
25 sexual abuse DOES Captain forced Plaintiff JANE TM-124 ROE to endure.
- 26 iv. Out of fear of retaliation and further confinement, Plaintiff JANE TM-124
27 ROE never reported the sexual misconduct assuming the complaints would
28 be unanswered, dismissed, ignored, and bury without investigation or

1 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
2 TM-124 ROE was systematically and consistently sexually abused in the
3 “safe haven” environment created and controlled by Defendants
4 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 5 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE TM-
6 124 ROE has experienced ongoing and persistent mental, emotional and
7 psychological problems, including, but not limited to: anxiety; depression;
8 feelings of helplessness; insomnia, questioning of sexual identity; lowered
9 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
10 with others and intimate relationships; loss of trust and control issues with
11 any persons in a position of authority and trust; loss of trust for and fear of
12 police officers and men; flashbacks and intrusive thoughts; stress;
13 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
14 among others.

15 uuuuu. **JANE SS-125 ROE:**

- 16 i. Plaintiff JANE SS-125 ROE is a female, born on 10/7/1998, who was
17 sexually abused in or around 2019 to 2020 when the sexual misconduct
18 alleged herein occurred at CCWF.
- 19 ii. Plaintiff JANE SS-125 ROE was committed to physical mandatory
20 confinement at CCWF where she encountered Defendant Correctional
21 Officer Sean Sosa who had unfettered access and control, and used a
22 position of power, trust and authority to sexually abuse and harass Plaintiff
23 JANE SS-125 ROE under color of authority on behalf of Defendants
24 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 25 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
26 means that would justify the sexual misconduct, Defendant Correctional
27 Officer Sosa sexually assaulted Plaintiff JANE SS-125 ROE on
28 approximately fifteen (15) occasions in which he would first try to get as

1 close to Plaintiff JANE SS-125 ROE as he could before putting his bare
2 hands on Plaintiff JANE SS-125 ROE'S body, groping her, and then
3 removing Plaintiff JANE SS-125 ROE'S pants before fondling Plaintiff
4 JANE SS-125 ROE'S vagina and breasts, as well as digitally penetrating
5 Plaintiff JANE SS-125 ROE'S vagina skin-to-skin. On other occasions,
6 Defendant Correctional Officer Sosa demanded that Plaintiff JANE SS-125
7 ROE flash her naked body when he did his rounds. Meanwhile, Defendant
8 Correctional Officer Sosa threatened Plaintiff JANE SS-125 ROE if she
9 reported the sexual abuse, saying he would write her up if she reported or
10 she would get more jail time if she reported.

11 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SS-125
12 ROE never reported the sexual misconduct assuming the complaints would
13 be unanswered, dismissed, ignored, and bury without investigation or
14 redress thereby allowing the sexual misconduct to continue until she
15 proceeded with filing an actual report in 2021. Plaintiff JANE SS-125 ROE
16 was systematically and consistently sexually abused in the "safe haven"
17 environment created and controlled by Defendants CALIFORNIA and
18 CDCR, THE ABUSERS, DOES, and each of them.

19 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SS-
20 125 ROE has experienced ongoing and persistent mental, emotional and
21 psychological problems, including, but not limited to: anxiety; depression;
22 feelings of helplessness; insomnia, questioning of sexual identity; lowered
23 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
24 with others and intimate relationships; loss of trust and control issues with
25 any persons in a position of authority and trust; loss of trust for and fear of
26 police officers and men; flashbacks and intrusive thoughts; stress;
27 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
28 among others.

1 vvvvv. **JANE LB-126 ROE:**

- 2 i. Plaintiff JANE LB-126 ROE is a female, born on 2/11/1985, who was
3 sexually abused in or around 2015 when the sexual misconduct alleged
4 herein occurred at CIW.
- 5 ii. Plaintiff JANE LB-126 ROE was committed to physical mandatory
6 confinement at CIW where she encountered DOES Correctional Officer
7 Turner who had unfettered access and control, and used a position of power,
8 trust and authority to sexually abuse and harass Plaintiff JANE LB-126
9 ROE under color of authority on behalf of Defendants CALIFORNIA and
10 CDCR, THE ABUSERS, DOES, and each of them.
- 11 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
12 means that would justify the sexual misconduct, DOES Correctional Officer
13 Turner entered Plaintiff JANE LB-126 ROE’S cell at night and fondled her
14 vagina, exposing his private parts to Plaintiff JANE LB-126 ROE and
15 rubbing his private parts against Plaintiff JANE LB-126 ROE’S bare skin.
16 DOES Correctional Officer Turner also demanded oral copulation from
17 Plaintiff JANE LB-126 ROE who refused. The sexual abuse occurred on
18 approximately two (2) to three (3) occasions.
- 19 iv. Out of fear of retaliation and further confinement, Plaintiff JANE LB-126
20 ROE never reported the sexual misconduct assuming the complaints would
21 be unanswered, dismissed, ignored, and bury without investigation or
22 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
23 LB-126 ROE was systematically and consistently sexually abused in the
24 “safe haven” environment created and controlled by Defendants
25 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 26 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE LB-
27 126 ROE has experienced ongoing and persistent mental, emotional and
28 psychological problems, including, but not limited to: anxiety; depression;

1 feelings of helplessness; insomnia, questioning of sexual identity; lowered
2 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
3 with others and intimate relationships; loss of trust and control issues with
4 any persons in a position of authority and trust; loss of trust for and fear of
5 police officers and men; flashbacks and intrusive thoughts; stress;
6 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
7 among others.

8 wwwwww. **JANE BB-127 ROE:**

- 9 i. Plaintiff JANE BB-127 ROE is a female, born on 9/17/1993, who was
10 sexually abused in or around 2023 when the sexual misconduct alleged
11 herein occurred at CCWF.
- 12 ii. Plaintiff JANE BB-127 ROE was committed to physical mandatory
13 confinement at CCWF where she encountered Defendant Correctional
14 Officer Derrick Davis who had unfettered access and control, and used a
15 position of power, trust and authority to sexually abuse and harass Plaintiff
16 JANE BB-127 ROE under color of authority on behalf of Defendants
17 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 18 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
19 means that would justify the sexual misconduct, Defendant Correctional
20 Officer Davis sexually abused JANE BB-127 ROE approximately 10 to 15
21 times, which included groping JANE BB-127 ROE'S buttocks while she
22 walked by, rubbing his penis against JANE BB-127 ROE'S buttocks,
23 demanding that JANE BB-127 ROE flash him while he was doing rounds,
24 raping JANE BB-127 ROE'S vagina with his penis, sodomizing JANE BB-
25 127 ROE, forcing JANE BB-127 ROE to kiss him, putting his mouth on
26 JANE BB-127 ROE'S breasts, and trying to get JANE BB-127 ROE to give
27 perform oral copulation on him. Meanwhile, Defendant Correctional
28 Officer Davis cyberstalked JANE BB-127 ROE'S famly and would make

1 comments that her children are cute and told JANE BB-127 ROE that he
2 would make her life a living hell if she reported any of the sexual abuse.

3 iv. Out of fear of retaliation and further confinement, Plaintiff JANE BB-127
4 ROE never reported the sexual misconduct assuming the complaints would
5 be unanswered, dismissed, ignored, and bury without investigation or
6 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
7 BB-127 ROE was systematically and consistently sexually abused in the
8 “safe haven” environment created and controlled by Defendants
9 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

10 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE BB-
11 127 ROE has experienced ongoing and persistent mental, emotional and
12 psychological problems, including, but not limited to: anxiety; depression;
13 feelings of helplessness; insomnia, questioning of sexual identity; lowered
14 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
15 with others and intimate relationships; loss of trust and control issues with
16 any persons in a position of authority and trust; loss of trust for and fear of
17 police officers and men; flashbacks and intrusive thoughts; stress;
18 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
19 among others.

20 xxxxx. **JANE VC-128 ROE:**

21 i. Plaintiff JANE VC-128 ROE is a female, born on 6/8/1994, who was
22 sexually abused in or around 2022 when the sexual misconduct alleged
23 herein occurred at CCWF.

24 ii. Plaintiff JANE VC-128 ROE was committed to physical mandatory
25 confinement at CCWF where she encountered DOES Correctional Officer
26 Davis who had unfettered access and control, and used a position of power,
27 trust and authority to sexually abuse and harass Plaintiff JANE VC-128
28

1 ROE under color of authority on behalf of Defendants CALIFORNIA and
2 CDCR, THE ABUSERS, DOES, and each of them.

3 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
4 means that would justify the sexual misconduct, DOES Correctional Officer
5 Davis told Plaintiff JANE VC-128 ROE to show him how things worked
6 around the facility as Plaintiff JANE VC-128 ROE was a porter for the A
7 Yard. However, DOES Correctional Officer Davis proceeded to take
8 Plaintiff JANE VC-128 ROE to a supply closet and forced Plaintiff JANE
9 VC-128 ROE to perform oral copulation on him until he ejaculated into a
10 rag. This sexual abuse occurred approximately five (5) times.

11 iv. Out of fear of retaliation and further confinement, Plaintiff JANE VC-128
12 ROE never reported the sexual misconduct assuming the complaints would
13 be unanswered, dismissed, ignored, and bury without investigation or
14 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
15 VC-128 ROE was systematically and consistently sexually abused in the
16 “safe haven” environment created and controlled by Defendants
17 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

18 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE VC-
19 128 ROE has experienced ongoing and persistent mental, emotional and
20 psychological problems, including, but not limited to: anxiety; depression;
21 feelings of helplessness; insomnia, questioning of sexual identity; lowered
22 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
23 with others and intimate relationships; loss of trust and control issues with
24 any persons in a position of authority and trust; loss of trust for and fear of
25 police officers and men; flashbacks and intrusive thoughts; stress;
26 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
27 among others.

28 yyyyy. **JANE CC-129 ROE:**

- 1 i. Plaintiff JANE CC-129 ROE is a female, born on 7/16/1981, who was
2 sexually abused in or around 2014 when the sexual misconduct alleged
3 herein occurred at CCWF.
- 4 ii. Plaintiff JANE CC-129 ROE was committed to physical mandatory
5 confinement at CCWF where she encountered DOES Correctional Officer
6 Orosco who had unfettered access and control, and used a position of power,
7 trust and authority to sexually abuse and harass Plaintiff JANE CC-129
8 ROE under color of authority on behalf of Defendants CALIFORNIA and
9 CDCR, THE ABUSERS, DOES, and each of them.
- 10 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
11 means that would justify the sexual misconduct, DOES Correctional Officer
12 Orosco called Plaintiff JANE CC-129 ROE out of the gym stating that she
13 had duties and needed to dump the trash before pulling her pants down and
14 penetrating her vagina with his penis. The sexual abuse occurred on
15 approximately three (3) occasions. In addition, DOES Correctional Officer
16 Orosco groped Plaintiff JANE CC-129 ROE’S breasts underneath her
17 clothes on a fourth occasion. Meanwhile, DOES Correctional Officer
18 Orosco threatened Plaintiff JANE CC-129 ROE with more time in the
19 facility and said he would plant drugs in Plaintiff JANE CC-129 ROE’S
20 locker.
- 21 iv. Out of fear of retaliation and further confinement, Plaintiff JANE CC-129
22 ROE never reported the sexual misconduct assuming the complaints would
23 be unanswered, dismissed, ignored, and bury without investigation or
24 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
25 CC-129 ROE was systematically and consistently sexually abused in the
26 “safe haven” environment created and controlled by Defendants
27 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
28

1 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE CC-
2 129 ROE has experienced ongoing and persistent mental, emotional and
3 psychological problems, including, but not limited to: anxiety; depression;
4 feelings of helplessness; insomnia, questioning of sexual identity; lowered
5 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
6 with others and intimate relationships; loss of trust and control issues with
7 any persons in a position of authority and trust; loss of trust for and fear of
8 police officers and men; flashbacks and intrusive thoughts; stress;
9 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
10 among others.

11 *zzzzz.* **JANE DH-130 ROE:**

- 12 i. Plaintiff JANE DH-130 ROE is a female, born on 5/6/1978, who was
13 sexually abused in or around 2017 when the sexual misconduct alleged
14 herein occurred at CCWF.
- 15 ii. Plaintiff JANE DH-130 ROE was committed to physical mandatory
16 confinement at CCWF where she encountered Defendant Correctional
17 Officer Sean Guyson who had unfettered access and control, and used a
18 position of power, trust and authority to sexually abuse and harass Plaintiff
19 JANE DH-130 ROE under color of authority on behalf of Defendants
20 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.
- 21 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
22 means that would justify the sexual misconduct, Defendant Correctional
23 Officer Guyson forced Plaintiff JANE DH-130 ROE into a supply closet
24 and violently squeezed and fondled Plaintiff JANE DH-130 ROE’S breasts
25 underneath her clothes.
- 26 iv. Out of fear of retaliation and further confinement, Plaintiff JANE DH-130
27 ROE never reported the sexual misconduct assuming the complaints would
28 be unanswered, dismissed, ignored, and bury without investigation or

1 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
2 DH-130 ROE was systematically and consistently sexually abused in the
3 “safe haven” environment created and controlled by Defendants
4 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 5 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE DH-
6 130 ROE has experienced ongoing and persistent mental, emotional and
7 psychological problems, including, but not limited to: anxiety; depression;
8 feelings of helplessness; insomnia, questioning of sexual identity; lowered
9 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
10 with others and intimate relationships; loss of trust and control issues with
11 any persons in a position of authority and trust; loss of trust for and fear of
12 police officers and men; flashbacks and intrusive thoughts; stress;
13 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
14 among others.

15 aaaaaa. **JANE LJ-131 ROE:**

- 16 i. Plaintiff JANE LJ-131 ROE is a female, born on 12/11/1967, who was
17 sexually abused in or around 2014 when the sexual misconduct alleged
18 herein occurred at CCWF.
- 19 ii. Plaintiff JANE LJ-131 ROE was committed to physical mandatory
20 confinement at CCWF where she encountered DOES Correctional Officer
21 Gardner who had unfettered access and control, and used a position of
22 power, trust and authority to sexually abuse and harass Plaintiff JANE LJ-
23 131 ROE under color of authority on behalf of Defendants CALIFORNIA
24 and CDCR, THE ABUSERS, DOES, and each of them.
- 25 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
26 means that would justify the sexual misconduct, DOES Correctional Officer
27 Gardner began making derogatory and sexual comments toward Plaintiff
28 JANE LJ-131 ROE such as saying what he would do to her if she ever gave

1 him a chance, sexually. DOES Correctional Officer Gardner also told
2 Plaintiff JANE LJ-131 ROE he could make her time there difficult or easy
3 based on compliance with sexual acts. One time, while returning to her cell
4 from retrieving a package, DOES Correctional Officer Garder stuck his
5 hand inside Plaintiff JANE LJ-131 ROE'S shirt and bra before cupping
6 Plaintiff JANE LJ-131 ROE'S breast with one hand and squeezing hard.
7 Plaintiff JANE LJ-131 ROE'S breast was red from DOES Correctional
8 Officer Gardner squeezing so hard. After the sexual abuse, DOES
9 Correctional Officer Gardner laughed as if the sexual abuse was funny.
10 Before leaving Plaintiff JANE LJ-131 ROE'S room, DOES Correctional
11 Officer Gardner told Plaintiff JANE LJ-131 ROE that no one would believe
12 her if she reported the sexual abuse. On several another occasions, DOES
13 Correctional Officer Gardner approached Plaintiff JANE LJ-131 ROE from
14 behind and rubbed his body and penis against Plaintiff JANE LJ-131
15 ROE'S body. Meanwhile, DOES Correctional Officer Gardner gave
16 Plaintiff JANE LJ-131 ROE special treatment such as bringing her outside
17 food and tobacco, along with avoiding searches of her room while searches
18 in the facility were taking place. Further, DOES Correctional Officer
19 Gardner bragged to Plaintiff JANE LJ-131 ROE and told her about sexual
20 abuse he intended on performing on other inmates.

21 iv. Out of fear of retaliation and further confinement, Plaintiff JANE LJ-131
22 ROE never reported the sexual misconduct, other than telling a nurse one
23 time whose name Plaintiff JANE LJ-131 ROE does not recall, assuming the
24 complaints would be unanswered, dismissed, ignored, and bury without
25 investigation or redress thereby allowing the sexual misconduct to continue.
26 Plaintiff JANE LJ-131 ROE was systematically and consistently sexually
27 abused in the "safe haven" environment created and controlled by
28

1 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
2 of them.

- 3 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE LJ-
4 131 ROE has experienced ongoing and persistent mental, emotional and
5 psychological problems, including, but not limited to: anxiety; depression;
6 feelings of helplessness; insomnia, questioning of sexual identity; lowered
7 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
8 with others and intimate relationships; loss of trust and control issues with
9 any persons in a position of authority and trust; loss of trust for and fear of
10 police officers and men; flashbacks and intrusive thoughts; stress;
11 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
12 among others.

13 bbbbbb. **JANE AC-132 ROE:**

- 14 i. Plaintiff JANE AC-132 ROE is a female, born on 5/24/1988, who was
15 sexually abused in or around 2013 to 2014 when the sexual misconduct
16 alleged herein occurred at CCWF.
- 17 ii. Plaintiff JANE AC-132 ROE was committed to physical mandatory
18 confinement at CCWF where she encountered DOES Correctional Officer
19 Mount and Defendant Correctional Officer Ruben Mendoza who had
20 unfettered access and control, and used a position of power, trust and
21 authority to sexually abuse and harass Plaintiff JANE AC-132 ROE under
22 color of authority on behalf of Defendants CALIFORNIA and CDCR, THE
23 ABUSERS, DOES, and each of them.
- 24 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
25 means that would justify the sexual misconduct, DOES Correctional Officer
26 Mount pulled Plaintiff JANE AC-132 ROE out of her cell at nighttime and
27 confided in her about his home life, even crying at times. Meanwhile, as a
28 sergeant rolled into the area with his bike, DOES Correctional Officer

1 Mount told Plaintiff JANE AC-132 ROE to hide in a cabinet of his cubicle.
2 The sergeant never entered the area. However, DOES Correctional Officer
3 Mount proceeded to fondle Plaintiff JANE AC-132 ROE'S breasts and
4 vagina before digitally penetrating Plaintiff JANE AC-132 ROE'S vagina,
5 concluding by saying, "Yummy." On another occasion, DOES Correctional
6 Officer Mount appeared under the influence as he tried having sexual
7 intercourse with Plaintiff JANE AC-132 ROE by the trashcans outside, but
8 Plaintiff JANE AC-132 ROE refused and was able to run away after DOES
9 Correctional Officer Mount fondled Plaintiff JANE AC-132 ROE'S breasts
10 and vagina. DOES Correctional Officer Mount gave Plaintiff JANE AC-
11 132 ROE special treatment as the sexual abuse occurred including food,
12 cigarettes, an dcandy. On other occasions, Defendant Correctional Officer
13 Mendoza sexually abused Plaintiff JANE AC-132 ROE approximately
14 twenty-eight (28) times. During the sexual abuse, Defendant Correctional
15 Officer Mendoza pulled out his penis and made Plaintiff JANE AC-132
16 ROE masturbate him to the point of ejaculation in the hospital where
17 supplies were held. Further, Defendant Correctional Officer Mendoza
18 pulled up Plaintiff JANE AC-132 ROE'S shirt and orally stimulated her
19 breasts skin-to-skin. Defendant Correctional Officer Mendoza also digitally
20 penetrated Plaintiff JANE AC-132 ROE'S vagina. On other occasions,
21 Defendant Correctional Officer Mendoza had sexual intercourse with
22 Plaintiff JANE AC-132 ROE and ejaculated on Plaintiff JANE AC-132
23 ROE'S back. The sexual abuse occurred every week for about five (5)
24 months.

25 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AC-132
26 ROE never reported the sexual misconduct assuming the complaints would
27 be unanswered, dismissed, ignored, and bury without investigation or
28 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE

1 AC-132 ROE was systematically and consistently sexually abused in the
2 “safe haven” environment created and controlled by Defendants
3 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 4 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AC-
5 132 ROE has experienced ongoing and persistent mental, emotional and
6 psychological problems, including, but not limited to: anxiety; depression;
7 feelings of helplessness; insomnia, questioning of sexual identity; lowered
8 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
9 with others and intimate relationships; loss of trust and control issues with
10 any persons in a position of authority and trust; loss of trust for and fear of
11 police officers and men; flashbacks and intrusive thoughts; stress;
12 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
13 among others.

14 cccccc. **JANE JW-133 ROE:**

- 15 i. Plaintiff JANE JW-133 ROE is a female, born on 12/30/1980, who was
16 sexually abused in or around 2016 to 2017 when the sexual misconduct
17 alleged herein occurred at CCWF.
- 18 ii. Plaintiff JANE JW-133 ROE was committed to physical mandatory
19 confinement at CCWF where she encountered a DOES Correctional Officer
20 whose name Plaintiff JANE JW-133 ROE does not recall and DOES
21 Correctional Officer Rodriguez who had unfettered access and control, and
22 used a position of power, trust and authority to sexually abuse and harass
23 Plaintiff JANE JW-133 ROE under color of authority on behalf of
24 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
25 of them.
- 26 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
27 means that would justify the sexual misconduct, a DOES Correctional
28 Officer whose name Plaintiff JANE JW-133 ROE cannot recall made a

1 sexual comment about Plaintiff JANE JW-133 ROE’S mouth as she was
2 walking to get books her mother had sent her. Namely, this DOES
3 Correctional Officer told Plaintiff JANE JW-133 ROE that it looks like she
4 “sucks good dick” and “I sure do like your mouth, maybe we’ll see how that
5 works later.” On another occasion, DOES Correctional Officer Rodriguez
6 searched Plaintiff JANE JW-133 ROE by patting her body down before
7 putting his hand in between Plaintiff JANE JW-133 ROE’S legs. DOES
8 Correctional Officer Rodriguez then rubbed Plaintiff JANE JW-133 ROE’S
9 vagina with his fingers and proceeded to put his hands under Plaintiff JANE
10 JW-133 ROE’S bra, groping Plaintiff JANE JW-133 ROE’S breasts skin-
11 to-skin as Plaintiff JANE JW-133 ROE physically shook extremely hard in
12 fear. Then, DOES Correctional Officer Rodriguez said, “Too bad we don’t
13 have more time, I’ll see you later.” DOES Correctional Officer Rodriguez
14 next threatened Plaintiff JANE JW-133 ROE by saying if she told anyone
15 about the sexual abuse, there would be consequences.

16 iv. Out of fear of retaliation and further confinement, Plaintiff JANE JW-133
17 ROE never reported the sexual misconduct assuming the complaints would
18 be unanswered, dismissed, ignored, and bury without investigation or
19 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
20 JW-133 ROE was systematically and consistently sexually abused in the
21 “safe haven” environment created and controlled by Defendants
22 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

23 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE JW-
24 133 ROE has experienced ongoing and persistent mental, emotional and
25 psychological problems, including, but not limited to: anxiety; depression;
26 feelings of helplessness; insomnia, questioning of sexual identity; lowered
27 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
28 with others and intimate relationships; loss of trust and control issues with

1 any persons in a position of authority and trust; loss of trust for and fear of
2 police officers and men; flashbacks and intrusive thoughts; stress;
3 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
4 among others.

5 dddddd. **JANE SP-134 ROE:**

- 6 i. Plaintiff JANE SP-134 ROE is a female, born on 6/13/1984, who was
7 sexually abused in or around 2014 when the sexual misconduct alleged
8 herein occurred at CCWF.
- 9 ii. Plaintiff JANE SP-134 ROE was committed to physical mandatory
10 confinement at CCWF where she encountered DOES Correctional Officer
11 Trevino who had unfettered access and control, and used a position of
12 power, trust and authority to sexually abuse and harass Plaintiff JANE SP-
13 134 ROE under color of authority on behalf of Defendants CALIFORNIA
14 and CDCR, THE ABUSERS, DOES, and each of them.
- 15 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
16 means that would justify the sexual misconduct, DOES Correctional Officer
17 Trevino asked Plaintiff JANE SP-134 ROE to go clean the “hut.” As
18 Plaintiff JANE SP-134 ROE complied and cleaned the hut, DOES
19 Correctional Officer Trevino entered the hut and closed the door behind him
20 before asking Plaintiff JANE SP-134 ROE, “Hey, do you want to have some
21 fun?” Plaintiff JANE SP-134 ROE replied, “No,” and DOES Correctional
22 Officer Trevino said, “Well if you don’t do this my way, I’m going to make
23 your stay difficult.” DOES Correctional Officer Trevino next put Plaintiff
24 JANE SP-134 ROE’S hand into his pants and made Plaintiff JANE SP-134
25 ROE masturbate him. DOES Correctional Officer Trevino told Plaintiff
26 JANE SP-134 ROE not be scared and to “[d]o as you’re supposed to do.”
27 Meanwhile, Plaintiff JANE SP-134 ROE cried. However, DOES
28 Correctional Officer Trevino replied, “The more you cry, the worse it will

1 get for you.” DOES Correctional Officer Trevino then proceeded to
2 digitally penetrate Plaintiff JANE SP-134 ROE’s vagina with his bare hands
3 while masturbating himself until he ejaculated into Plaintiff JANE SP-134
4 ROE’S hand. DOES Correctional Officer Trevino also groped Plaintiff
5 JANE SP-134 ROE’S breasts and put his mouth on her breasts a handful of
6 times then and thereafter. In fact, DOES Correctional Officer Trevino
7 groped and touched Plaintiff JANE SP-134 ROE’S body nearly every time
8 he saw Plaintiff JANE SP-134 ROE. Aside from the groping, the
9 aforementioned sexual abuse including masturbation and digital penetration
10 of Plaintiff JANE SP-134 ROE by DOES Correctional Officer Trevino
11 occurred approximately four (4) times.

12 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SP-134
13 ROE never reported the sexual misconduct assuming the complaints would
14 be unanswered, dismissed, ignored, and bury without investigation or
15 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
16 SP-134 ROE was systematically and consistently sexually abused in the
17 “safe haven” environment created and controlled by Defendants
18 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

19 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SP-
20 134 ROE has experienced ongoing and persistent mental, emotional and
21 psychological problems, including, but not limited to: anxiety; depression;
22 feelings of helplessness; insomnia, questioning of sexual identity; lowered
23 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
24 with others and intimate relationships; loss of trust and control issues with
25 any persons in a position of authority and trust; loss of trust for and fear of
26 police officers and men; flashbacks and intrusive thoughts; stress;
27 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
28 among others.

1 eeeee. **JANE SM-135 ROE:**

2 i. Plaintiff JANE SM-135 ROE is a female, born on 4/7/1979, who was
3 sexually abused in or around 2014 when the sexual misconduct alleged
4 herein occurred at CCWF.

5 ii. Plaintiff JANE SM-135 ROE was committed to physical mandatory
6 confinement at CCWF where she encountered DOES Correctional Officer
7 Trevino and DOES Correctional Officer Flores who had unfettered access
8 and control, and used a position of power, trust and authority to sexually
9 abuse and harass Plaintiff JANE SM-135 ROE under color of authority on
10 behalf of Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES,
11 and each of them.

12 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
13 means that would justify the sexual misconduct, Defendant Correctional
14 Trevino continuously brushed his body up against Plaintiff JANE SM-135
15 ROE'S buttocks and put his hands down Plaintiff JANE SM-135 ROE'S
16 pants to touch her genitals. On another occasion, Defendant Correctional
17 Officer Trevino pulled down Plaintiff JANE SM-135 ROE'S pants and
18 fondled her vagina in the staff bathroom. Additionally, Defendant
19 Correctional Officer Trevino tried to have sexual intercourse with Plaintiff
20 JANE SM-135 ROE during all instances of sexual misconduct as well as
21 oral copulation, but Plaintiff JANE SM-135 ROE managed to fight him off
22 of her. Defendant Correctional Officer Trevino did digitally penetrate
23 Plaintiff JANE SM-135 ROE'S vagina on two of the occasions of sexual
24 misconduct. Further, Defendant Correctional Officer Trevino masturbated
25 himself in front Plaintiff JANE SM-135 ROE when she refused to perform
26 oral copulation on him, and also while watching Plaintiff JANE SM-135
27 ROE clean. Meanwhile, Defendant Correctional Officer Trevino threatened
28 to move Plaintiff JANE SM-135 ROE away from her cellmate if she did not

1 comply with his sexual abuse demands. Further, Defendant Correctional
2 Officer Trevino provided Plaintiff JANE SM-135 ROE with extra treatment
3 including letting Plaintiff JANE SM-135 ROE take extra cleaning supplies
4 to her cell. DOES Correctional Officer Flores consistently grabbed his
5 genitalia in front of Plaintiff JANE SM-135 ROE. During the sexual abuse,
6 however, DOES Correctional Officer Flores pulled out his penis and
7 grabbed Plaintiff JANE SM-135 ROE’S hand, forcing her to touch his
8 penis. On other occasions, DOES Correctional Officer Flores fondled
9 Plaintiff JANE SM-135 ROE’S breasts. Further, DOES Correctional
10 Officer Flores performed random patdown searches and, during those
11 searches, fondled Plaintiff JANE SM-135 ROE’S genitalia. DOES
12 Correctional Officer Flores also demanded that Plaintiff JANE SM-135
13 ROE perform oral copulation on him by forcing her head down toward his
14 penis. Meanwhile, DOES Correctional Officer Flores bribed Plaintiff JANE
15 SM-135 ROE with tobacco.

16 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SM-135
17 ROE never reported the sexual misconduct assuming the complaints would
18 be unanswered, dismissed, ignored, and bury without investigation or
19 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
20 SM-135 ROE was systematically and consistently sexually abused in the
21 “safe haven” environment created and controlled by Defendants
22 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

23 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SM-
24 135 ROE has experienced ongoing and persistent mental, emotional and
25 psychological problems, including, but not limited to: anxiety; depression;
26 feelings of helplessness; insomnia, questioning of sexual identity; lowered
27 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
28 with others and intimate relationships; loss of trust and control issues with

1 any persons in a position of authority and trust; loss of trust for and fear of
2 police officers and men; flashbacks and intrusive thoughts; stress;
3 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
4 among others.

5 fffff. **JANE KG-136 ROE:**

- 6 i. Plaintiff JANE KG-136 ROE is a female, born on 5/30/1980, who was
7 sexually abused in or around 2015 when the sexual misconduct alleged
8 herein occurred at CIW.
- 9 ii. Plaintiff JANE KG-136 ROE was committed to physical mandatory
10 confinement at CIW where she encountered DOES Correctional Officer
11 Darrow who had unfettered access and control, and used a position of
12 power, trust and authority to sexually abuse and harass Plaintiff JANE KG-
13 136 ROE under color of authority on behalf of Defendants CALIFORNIA
14 and CDCR, THE ABUSERS, DOES, and each of them.
- 15 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
16 means that would justify the sexual misconduct, DOES Correctional Officer
17 Darrow watched Plaintiff JANE KG-136 ROE while she exercised and
18 proceeded to brush his body against Plaintiff JANE KG-136 ROE'S body.
19 Further, while Plaintiff JANE KG-136 ROE was cleaning the training area,
20 she went to get additional cleaning supplies in the supply closet. DOES
21 Correctional Officer Darrow followed Plaintiff JANE KG-136 ROE inside
22 the closet, approached Plaintiff JANE KG-136 ROE from behind, and then
23 grabbed Plaintiff JANE KG-136 ROE'S breasts skin-to-skin. DOES
24 Correctional Officer Darrow also massaged his penis on Plaintiff JANE
25 KG-136 ROE'S buttocks.
- 26 iv. Out of fear of retaliation and further confinement, Plaintiff JANE KG-136
27 ROE never reported the sexual misconduct assuming the complaints would
28 be unanswered, dismissed, ignored, and bury without investigation or

1 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
2 KG-136 ROE was systematically and consistently sexually abused in the
3 “safe haven” environment created and controlled by Defendants
4 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 5 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE KG-
6 136 ROE has experienced ongoing and persistent mental, emotional and
7 psychological problems, including, but not limited to: anxiety; depression;
8 feelings of helplessness; insomnia, questioning of sexual identity; lowered
9 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
10 with others and intimate relationships; loss of trust and control issues with
11 any persons in a position of authority and trust; loss of trust for and fear of
12 police officers and men; flashbacks and intrusive thoughts; stress;
13 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
14 among others.

15 gggggg. **JANE AB-137 ROE:**

- 16 i. Plaintiff JANE AB-137 ROE is a female, born on 2/28/1975, who was
17 sexually abused in or around 2018 when the sexual misconduct alleged
18 herein occurred at CCWF.
- 19 ii. Plaintiff JANE AB-137 ROE was committed to physical mandatory
20 confinement at CCWF where she encountered DOES Correctional Officer
21 Velez who had unfettered access and control, and used a position of power,
22 trust and authority to sexually abuse and harass Plaintiff JANE AB-137
23 ROE under color of authority on behalf of Defendants CALIFORNIA and
24 CDCR, THE ABUSERS, DOES, and each of them.
- 25 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
26 means that would justify the sexual misconduct, DOES Correctional Officer
27 Velez entered Plaintiff JANE AB-137 ROE’S cell during dinner time as
28 Plaintiff JANE AB-137 ROE preferred to stay in her cell during this period.

1 DOES Correctional Officer Velez then removed his gloves and reached
2 underneath Plaintiff JANE AB-137 ROE’S pants and underwear before
3 touching Plaintiff JANE AB-137 ROE’S vagina skin-to-skin. DOES
4 Correctional Officer Velez next forced Plaintiff JANE AB-137 ROE to
5 perform oral copulation on him. This sexual abuse occurred on two
6 occasions. During another occasion, DOES Correctional Officer Velez
7 forced Plaintiff JANE AB-137 ROE to remove her clothes and have sexual
8 intercourse with him.

9 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AB-137
10 ROE never reported the sexual misconduct assuming the complaints would
11 be unanswered, dismissed, ignored, and bury without investigation or
12 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
13 AB-137 ROE was systematically and consistently sexually abused in the
14 “safe haven” environment created and controlled by Defendants
15 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

16 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AB-
17 137 ROE has experienced ongoing and persistent mental, emotional and
18 psychological problems, including, but not limited to: anxiety; depression;
19 feelings of helplessness; insomnia, questioning of sexual identity; lowered
20 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
21 with others and intimate relationships; loss of trust and control issues with
22 any persons in a position of authority and trust; loss of trust for and fear of
23 police officers and men; flashbacks and intrusive thoughts; stress;
24 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
25 among others.

26 hhhhhh. **JANE VD-138 ROE:**

- 1 i. Plaintiff JANE VD-138 ROE is a female, born on 6/20/1985, who was
2 sexually abused in or around 2014 when the sexual misconduct alleged
3 herein occurred at CCWF.
- 4 ii. Plaintiff JANE VD-138 ROE was committed to physical mandatory
5 confinement at CCWF where she encountered DOES Correctional Officer
6 Turner who had unfettered access and control, and used a position of power,
7 trust, and authority to sexually abuse and harass Plaintiff JANE VD-138
8 ROE under color of authority on behalf of Defendants CALIFORNIA and
9 CDCR, THE ABUSERS, DOES, and each of them.
- 10 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
11 means that would justify the sexual misconduct, DOES Correctional Officer
12 Turner asked Plaintiff JANE VD-138 ROE to come closer to him and then
13 brought Plaintiff JANE VD-138 ROE to the side of a bathroom where no
14 one could see him place his hand inside her shirt and fondle her breasts skin-
15 to-skin. DOES Correctional Officer Turner then put his hand down Plaintiff
16 JANE VD-138 ROE'S pants and inside her underwear before fondling her
17 vagina with his fingers and next digitally penetrating her vagina. DOES
18 Correctional Officer Turner told Plaintiff JANE VD-138 ROE that he would
19 give her anything she asked for so long as she did not tell anyone. On
20 another occasion, inside a bathroom and DOES Correctional Officer Turner
21 entered, grabbed Plaintiff JANE VD-138 ROE, and stuck his hand inside
22 Plaintiff JANE VD-138 ROE'S pants forcefully before rubbing his bare
23 fingers on Plaintiff JANE VD-138 ROE'S vagina. DOES Correctional
24 Officer Turner threatened Plaintiff JANE VD-138 ROE with write-ups and
25 losing her release date if she did not comply with his demands.
- 26 iv. Out of fear of retaliation and further confinement, Plaintiff JANE VD-138
27 ROE never reported the sexual misconduct assuming the complaints would
28 be unanswered, dismissed, ignored, and bury without investigation or

1 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
2 VD-138 ROE was systematically and consistently sexually abused in the
3 “safe haven” environment created and controlled by Defendants
4 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 5 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE VD-
6 138 ROE has experienced ongoing and persistent mental, emotional and
7 psychological problems, including, but not limited to: anxiety; depression;
8 feelings of helplessness; insomnia, questioning of sexual identity; lowered
9 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
10 with others and intimate relationships; loss of trust and control issues with
11 any persons in a position of authority and trust; loss of trust for and fear of
12 police officers and men; flashbacks and intrusive thoughts; stress;
13 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
14 among others.

15 **iiiiii. JANE SM-139 ROE:**

- 16 i. Plaintiff JANE SM-139 ROE is a female, born on 10/22/1980, who was
17 sexually abused in or around 2014 when the sexual misconduct alleged
18 herein occurred at CCWF.
- 19 ii. Plaintiff JANE SM-139 ROE was committed to physical mandatory
20 confinement at CCWF where she encountered Defendant Correctional
21 Officer Gregory Rodriguez who had unfettered access and control, and used
22 a position of power, trust, and authority to sexually abuse and harass
23 Plaintiff JANE SM-139 ROE under color of authority on behalf of
24 Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES, and each
25 of them.
- 26 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
27 means that would justify the sexual misconduct, Defendant Correctional
28 Officer Rodriguez followed Plaintiff JANE SM-139 ROE into a room in the

1 D yard and groped Plaintiff JANE SM-139 ROE’S body. Defendant
2 Correctional Officer Rodriguez then stuck his bare hands into Plaintiff
3 JANE SM-139 ROE’S pants, touching Plaintiff JANE SM-139 ROE’S
4 vagina, and then digitally penetrating Plaintiff JANE SM-139 ROE’S
5 vagina. Plaintiff JANE SM-139 ROE tried to push Defendant Correctional
6 Officer Rodriguez off of her and Defendant Correctional Officer Rodriguez
7 replied by sticking his finger into his mouth and saying, “Tastes good. I
8 cannot wait to taste you.” On another occasion, Defendant Correctional
9 Officer Rodriguez entered Plaintiff JANE SM-139 ROE’S cell, pushed
10 Plaintiff JANE SM-139 ROE up against a wall, and forcefully kissed
11 Plaintiff JANE SM-139 ROE on the mouth. Thereafter, during another
12 instance of sexual assault, Defendant Correctional Officer Rodriguez woke
13 up Plaintiff JANE SM-139 ROE who was in her cell sleeping, forced his
14 hands down Plaintiff JANE SM-139 ROE’S pants without any gloves on,
15 and aggressively digitally penetrated Plaintiff JANE SM-139 ROE’S vagina
16 and groped Plaintiff JANE SM-139 ROE’S breasts.

17 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SM-139
18 ROE never reported the sexual misconduct assuming the complaints would
19 be unanswered, dismissed, ignored, and bury without investigation or
20 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
21 SM-139 ROE was systematically and consistently sexually abused in the
22 “safe haven” environment created and controlled by Defendants
23 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

24 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SM-
25 139 ROE has experienced ongoing and persistent mental, emotional and
26 psychological problems, including, but not limited to: anxiety; depression;
27 feelings of helplessness; insomnia, questioning of sexual identity; lowered
28 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting

1 with others and intimate relationships; loss of trust and control issues with
2 any persons in a position of authority and trust; loss of trust for and fear of
3 police officers and men; flashbacks and intrusive thoughts; stress;
4 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
5 among others.

6 **jjjjj. JANE SD-140 ROE:**

- 7 i. Plaintiff JANE SD-140 ROE is a female, born on 6/7/1970, who was
8 sexually abused in or around 2014 when the sexual misconduct alleged
9 herein occurred at CCWF.
- 10 ii. Plaintiff JANE SD-140 ROE was committed to physical mandatory
11 confinement at SD-140 where she encountered DOES Correctional Officer
12 Thomas who had unfettered access and control, and used a position of
13 power, trust, and authority to sexually abuse and harass Plaintiff JANE SD-
14 140 ROE under color of authority on behalf of Defendants CALIFORNIA
15 and CDCR, THE ABUSERS, DOES, and each of them.
- 16 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
17 means that would justify the sexual misconduct, DOES Correctional Officer
18 Thomas entered Plaintiff JANE SD-140 ROE'S cell, made Plaintiff JANE
19 SD-140 ROE face the wall, and rubbed Plaintiff JANE SD-140 ROE'S
20 breasts skin-to-skin. Meanwhile, DOES Correctional Officer Thomas
21 pressed his body against Plaintiff JANE SD-140 ROE'S body, rubbing his
22 bare genitals against Plaintiff JANE SD-140 ROE'S buttocks until he
23 ejaculated. This sexual abuse occurred on approximately four (4) occasions.
24 Further, DOES Correctional Officer Turner threatened Plaintiff JANE SD-
25 140 ROE with solitary confinement, kicking her out of the unit, and
26 prolonging her release date if she reported the abuse to anyone.
- 27 iv. Out of fear of retaliation and further confinement, Plaintiff JANE SD-140
28 ROE reported the sexual misconduct to the Investigative Services Unit

1 though assumed the complaints would be unanswered, dismissed, ignored,
2 and bury without investigation or redress thereby allowing the sexual
3 misconduct to continue. Plaintiff JANE SD-140 ROE was systematically
4 and consistently sexually abused in the “safe haven” environment created
5 and controlled by Defendants CALIFORNIA and CDCR, THE ABUSERS,
6 DOES, and each of them.

- 7 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE SD-
8 140 ROE has experienced ongoing and persistent mental, emotional and
9 psychological problems, including, but not limited to: anxiety; depression;
10 feelings of helplessness; insomnia, questioning of sexual identity; lowered
11 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
12 with others and intimate relationships; loss of trust and control issues with
13 any persons in a position of authority and trust; loss of trust for and fear of
14 police officers and men; flashbacks and intrusive thoughts; stress;
15 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
16 among others.

17 kkkkkk. **JANE RH-141 ROE:**

- 18 i. Plaintiff JANE RH-141 ROE is a female, born on 3/25/1986, who was
19 sexually abused in or around 2019 when the sexual misconduct alleged
20 herein occurred at CCWF.
21 ii. Plaintiff JANE RH-141 ROE was committed to physical mandatory
22 confinement at CCWF where she encountered DOES Correctional Officer
23 Avalos and DOES Correctional Officer Saucedo who had unfettered access
24 and control, and used a position of power, trust, and authority to sexually
25 abuse and harass Plaintiff JANE RH-141 ROE under color of authority on
26 behalf of Defendants CALIFORNIA and CDCR, THE ABUSERS, DOES,
27 and each of them.

1 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
2 means that would justify the sexual misconduct, DOES Correctional Officer
3 Avalos followed Plaintiff JANE RH-141 ROE into a janitor's closet and
4 cloesd the door before removing his pants, exposing his penis, and stating,
5 “You know what to do.” Plaintiff JANE RH-141 ROE then performed oral
6 copulation on DOES Correctional Officer Avalos until he ejaculated in
7 Plaintiff JANE RH-141 ROE'S mouth. This sexual abuse reoccurred
8 approximatley two (2) more times. Further, in exchange for the sexual
9 abuse, DOES Correctional Officer Avalos gave Plaintiff JANE RH-141
10 ROE heroin. On approximately two (2) to three (3) more occasions inside a
11 janitor's closet, DOES Correctional Officer Avalos wore a condom as he
12 inserted his penis inside Plaintiff JANE RH-141 ROE'S vagina until
13 ejaculation. During one of these occasions, someone named DOES
14 Correctional Officer Vang watched DOES Correctional Officer Avalos
15 penetrate Plaintiff JANE RH-141 ROE'S vagina with his penis. After each
16 instance of this sexual abuse, DOES Correctional Officer Avalos also gave
17 Plaintiff JANE RH-141 ROE's heroin, and also allowed Plaintiff JANE
18 RH-141 ROE to use the laundry room, leave her cell when inamtes were in
19 lockdown, and inform Plaintiff JANE RH-141 ROE about an approaching
20 cell search so she would not get caught with the drugs DOES Correctional
21 Officer Avalos provided. DOES Correctional Officer Avalos also
22 threatened Plaintiff JANE RH-141 ROE if she reported the abuse and said,
23 “I had a girl go in the lifer's room and locked her in there as she got beat
24 up. She was fucked up and had to go to 805.” On another occasion, DOES
25 Correctional Officer Saucedo grabbed Plaintiff JANE RH-141 ROE'S
26 buttocks, breasts, and vagina, and made sexual comments toward her. This
27 sexual abuse occurred nearly once a week for several months.
28

1 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
2 means that would justify the sexual misconduct, DOES Correctional Officer
3 Trevino pepper sprayed Plaintiff JANE ML-142 ROE before handcuffing
4 her and putting his hands up Plaintiff JANE ML-142 ROE’S shirt skin-to-
5 skin. Specifically, DOES Correctional Officer Trevino squeezed Plaintiff
6 JANE ML-142 ROE’S breasts forcefully and then touched Plaintiff JANE
7 ML-142 ROE’S body barehanded. DOES Correctional Officer Trevino told
8 Plaintiff JANE ML-142 ROE not to open her mouth so as to report the
9 sexual abuse or her roommates would know why their room was getting
10 “hit.”

11 iv. Out of fear of retaliation and further confinement, Plaintiff JANE ML-142
12 ROE never reported the sexual misconduct assuming the complaints would
13 be unanswered, dismissed, ignored, and bury without investigation or
14 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
15 ML-142 ROE was systematically and consistently sexually abused in the
16 “safe haven” environment created and controlled by Defendants
17 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

18 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE ML-
19 142 ROE has experienced ongoing and persistent mental, emotional and
20 psychological problems, including, but not limited to: anxiety; depression;
21 feelings of helplessness; insomnia, questioning of sexual identity; lowered
22 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
23 with others and intimate relationships; loss of trust and control issues with
24 any persons in a position of authority and trust; loss of trust for and fear of
25 police officers and men; flashbacks and intrusive thoughts; stress;
26 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
27 among others.

28 mmmmmm. **JANE LF-143 ROE:**

- 1 i. Plaintiff JANE LF-143 ROE is a female, born on 7/21/1981, who was
2 sexually abused in or around 2018 when the sexual misconduct alleged
3 herein occurred at CCWF.
- 4 ii. Plaintiff JANE LF-143 ROE was committed to physical mandatory
5 confinement at CCWF where she encountered DOES Correctional Officer
6 Trevino who had unfettered access and control, and used a position of
7 power, trust, and authority to sexually abuse and harass Plaintiff JANE LF-
8 143 ROE under color of authority on behalf of Defendants CALIFORNIA
9 and CDCR, THE ABUSERS, DOES, and each of them.
- 10 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
11 means that would justify the sexual misconduct, DOES Correctional Officer
12 Trevino was allegedly taking Plaintiff JANE LF-143 ROE to a medical
13 appointment after Plaintiff JANE LF-143 ROE got into a fight, but instead
14 took Plaintiff JANE LF-143 ROE to a private room in the hall. On the way,
15 DOES Correctional Officer Trevino made inappropriate comments to
16 Plaintiff JANE LF-143 ROE about wanting to have sexual intercourse with
17 her. DOES Correctional Officer Trevino then asked Plaintiff JANE LF-143
18 ROE if she would perform oral copulation on him, but Plaintiff JANE LF-
19 143 ROE refused. Thereafter, DOES Correctional Officer Trevino grabbed
20 and fondled Plaintiff JANE LF-143 ROE'S vagina. Next, DOES
21 Correctional Officer Trevino exposed his penis to Plaintiff JANE LF-143
22 ROE and took Plaintiff JANE LF-143 ROE'S hand roughly, placing
23 Plaintiff JANE LF-143 ROE'S bare hand on his penis skin-to-skin, making
24 Plaintiff JANE LF-143 ROE fondle his penis.
- 25 iv. Out of fear of retaliation and further confinement, Plaintiff JANE LF-143
26 ROE never reported the sexual misconduct assuming the complaints would
27 be unanswered, dismissed, ignored, and bury without investigation or
28 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE

1 LF-143 ROE was systematically and consistently sexually abused in the
2 “safe haven” environment created and controlled by Defendants
3 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

- 4 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE LF-
5 143 ROE has experienced ongoing and persistent mental, emotional and
6 psychological problems, including, but not limited to: anxiety; depression;
7 feelings of helplessness; insomnia, questioning of sexual identity; lowered
8 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
9 with others and intimate relationships; loss of trust and control issues with
10 any persons in a position of authority and trust; loss of trust for and fear of
11 police officers and men; flashbacks and intrusive thoughts; stress;
12 nervousness; fear; embarrassment; shame; and loss of enjoyment of life,
13 among others.

14 nnnnnn. **JANE AG-144 ROE:**

- 15 i. Plaintiff JANE AG-144 ROE is a female, born on 3/18/1989, who was
16 sexually abused in or around 2019 when the sexual misconduct alleged
17 herein occurred at CCWF.
- 18 ii. Plaintiff JANE AG-144 ROE was committed to physical mandatory
19 confinement at CCWF where she encountered DOES Correctional Officer
20 Tyrah who had unfettered access and control, and used a position of power,
21 trust, and authority to sexually abuse and harass Plaintiff JANE AG-144
22 ROE under color of authority on behalf of Defendants CALIFORNIA and
23 CDCR, THE ABUSERS, DOES, and each of them.
- 24 iii. Absent any legal authority, reasonable suspicion, probable cause, or other
25 means that would justify the sexual misconduct, DOES Correctional Officer
26 Tyrah approached Plaintiff JANE AG-144 ROE who was working in the
27 kitchen, reached under Plaintiff JANE AG-144 ROE’S shirt and under her
28

1 bra, and groped Plaintiff JANE AG-144 ROE’S bare breasts. This sexual
2 assault occurred on approximately three (3) occasions.

3 iv. Out of fear of retaliation and further confinement, Plaintiff JANE AG-144
4 ROE never reported the sexual misconduct assuming the complaints would
5 be unanswered, dismissed, ignored, and bury without investigation or
6 redress thereby allowing the sexual misconduct to continue. Plaintiff JANE
7 AG-144 ROE was systematically and consistently sexually abused in the
8 “safe haven” environment created and controlled by Defendants
9 CALIFORNIA and CDCR, THE ABUSERS, DOES, and each of them.

10 v. As a directly and proximate result of the sexual abuse, Plaintiff JANE AG-
11 144 ROE has experienced ongoing and persistent mental, emotional and
12 psychological problems, including, but not limited to: anxiety; depression;
13 feelings of helplessness; insomnia, questioning of sexual identity; lowered
14 self-esteem; moodiness; drug abuse; difficulty in meaningfully interacting
15 with others and intimate relationships; loss of trust and control issues with
16 any persons in a position of authority and trust; loss of trust for and fear of
17 police officers and men; flashbacks and intrusive thoughts; stress;

18 31. DEFENDANTS and agents and/or employees failed to take reasonable steps and
19 implement reasonable safeguards to avoid acts of unlawful sexual conduct, including preventing
20 abuse of PLAINTIFFS by THE ABUSERS, avoiding placement of THE ABUSERS in a function
21 or environment in which direct contact with, and complete control of, its inmates is an inherent
22 part of that function or environment. Instead, DEFENDANTS, and each of them, ignored and
23 concealed the sexual abuse, and sexual harassment, of PLAINTIFFS and others. DEFENDANTS
24 and agents and/or employees failed to properly supervise THE ABUSERS at CALIFORNIA and
25 CDCR mandatory confinement facilities, which led to many inmates, including PLAINTIFFS,
26 being repeatedly sexually abused, molested, and harassed.

27 32. DEFENDANTS and agents and/or employees failed to take reasonable steps and
28 implement reasonable safeguards to prevent acts of sexual conduct by THE ABUSERS and DOES

1 1-500, including, but not limited to, permitting a “safe haven environment” in which THE
2 ABUSERS and DOES 1-500 were given opportunities and locals to isolate, control, and directly
3 contact inmates for their own sexual gratification without supervision or monitoring.

4 33. Had DEFENDANTS and agents and/or employees properly supervised and
5 controlled the environment, instead of ignoring and concealing the sexual abuse and harassment,
6 PLAINTIFFS contend the abuse would have been avoided and/or detected thereby preventing
7 THE ABUSERS and DOES 1-500 from sexually assaulting inmates for their own sexual
8 gratification.

9 34. In subjecting PLAINTIFFS to the sexual abuse and harassment, DEFENDANTS
10 and agents and/or employees acted willfully and maliciously with the intent to harm PLAINTIFFS,
11 and in conscious disregard of PLAINTIFFS’ rights, so as to constitute malice and/or oppression
12 under California Civil Code section 3294. PLAINTIFFS are informed, and on that basis allege,
13 that specifically, DEFENDANTS and agents and/or employees acted in concert, and under their
14 authority as a correctional and rehabilitative residential center within Defendants CALIFORNIA
15 and CDCR’S female justice system, with reckless disregard for the concern of the inmates in its
16 charge. DEFENDANTS and agents and/or employees acted intentionally in creating an
17 environment that harbored molesters, placed PLAINTIFFS at inherent and devastating risk of
18 harm, and ignored clear warning signs and their duties to report sexual abusers in their ranks, in
19 order to maintain a façade of normalcy and to maintain the funding of the CDCR.

20 35. The safety of inmates entrusted and confined at CALIFORNIA and CDCR was
21 devastatingly compromised due to DEFENDANTS and agents and/or employees’ desire to
22 maintain the status quo and circumvent any public scrutiny for their misconduct. These willful,
23 malicious, and/or oppressive acts, as alleged herein above, were ratified by the officers, directors,
24 and/or managing agents of DEFENDANTS and agents and/or employees, thereby entitling them
25 to punitive damages according to proof.

26 36. DEFENDANTS and agents and/or employees acts and/or omissions to acts in the
27 commission of the sexual abuse was done by agents and/or employees who prevented and/or
28 deterred the victims from coming forward through threats of intimidation and violence, and

1 therefore DEFENDANTS should be estopped from asserting the limitations of any claims statute.

2
3 **FIRST CAUSE OF ACTION**

4 **SEXUAL ASSAULT**

5 **(Against DEFENDANTS and DOES 1-500)**

6 37. PLAINTIFFS incorporate by reference the allegations set forth above as though
7 fully set forth herein.

8 38. DEFENDANTS and agents and/or employees in committing the acts herein
9 alleged, intended to subject PLAINTIFFS to sexual abuse and molestation while PLAINTIFFS
10 were confined to CALIFORNIA and CDCR mandatory confinement facilities, all while they acted
11 in the course and scope of their agency/employment.

12 39. In so doing, they intended to cause harmful or offensive contact with PLAINTIFFS’
13 persons, and/or intended to put PLAINTIFFS in imminent apprehension of such contact.

14 40. DEFENDANTS and agents and/or employees placed PLAINTIFFS in imminent
15 apprehension of harmful or offensive contact, and PLAINTIFFS actually and reasonably believed
16 that DEFENDANTS and agents and/or employees had the ability to make harmful or offensive
17 contact with PLAINTIFFS’ persons.

18 41. PLAINTIFFS did not consent to DEFENDANTS and agents and/or employees
19 intended harmful or offensive contact with PLAINTIFFS’ persons, or to their intent to place
20 PLAINTIFFS in imminent apprehension of such contact.

21 42. In committing the acts herein alleged, DEFENDANTS and agents and/or
22 employees violated PLAINTIFFS’ right, pursuant to *Civil Code* § 43, of protection from bodily
23 restraint or harm, and from personal insult.

24 43. In committing the acts herein alleged, DEFENDANTS and agents and/or
25 employees violated their duty, pursuant to *Civil Code* § 1708, to abstain from injuring the persons
26 of PLAINTIFFS or infringing upon their rights.

27 44. As a direct and proximate result of the conduct of DEFENDANTS, individually,
28 jointly, and/or severally, PLAINTIFFS sustained severe emotional distress and physical pain,

1 emotional anguish, fear, anxiety, humiliation, embarrassment, and other physical and emotional
2 injuries, damages (both economic and noneconomic), and permanent disability, in the past,
3 present, and future. The injuries suffered by PLAINTIFFS are substantial, continuing, and
4 permanent. PLAINTIFFS are entitled to damages in an amount to be determined by proof at trial.

5 45. DEFENDANTS and agents and/or employees' acts also constitute conduct
6 intended by them to cause injury to PLAINTIFFS and despicable, malicious, and/or oppressive
7 conduct that is carried on with willful and conscious disregard for the rights and safety of others
8 in direct violation of *Civil Code* section 3294, subdivision (a). PLAINTIFFS are, therefore, entitled
9 to punitive damages against DEFENDANTS and each of them in an amount to be determined by
10 proof at trial.

11 **SECOND CAUSE OF ACTION**

12 **SEXUAL BATTERY (CIVIL CODE § 1708.5)**

13 **(Against DEFENDANTS and DOES 1-500)**

14 46. PLAINTIFFS incorporate by reference the allegations set forth above as though
15 fully set forth herein.

16 47. At all times herein referenced, DEFENDANTS and agents and/or employees were
17 employees of Defendants CALIFORNIA and CDCR and/or other governmental entities to be
18 shown according to proof, during which time THE ABUSERS and DOES 1-500 were acting within
19 the scope of their agency and employment.

20 48. During PLAINTIFFS' confinement at CALIFORNIA and CDCR mandatory
21 confinement facilities, DEFENDANTS and agents and/or employees intentionally, recklessly, and
22 wantonly did acts which were intended to, and did, result in harmful and offensive contact with
23 intimate parts of PLAINTIFFS' persons, during PLAINTIFFS' time at CALIFORNIA and CDCR
24 mandatory confinement facilities all while they acted in the course and scope of their
25 agency/employment with CALIFORNIA and CDCR in violation of *Penal Code* §§ 243.4(a) and
26 289.6.

27 49. Further, PLAINTIFFS did not consent to the harmful contact with PLAINTIFFS'
28 person.

1 emotional distress, or done in reckless disregard of the probability of causing PLAINTIFFS to
2 suffer humiliation, embarrassment, mental anguish, and/or severe physical and/or emotional
3 distress.

4 62. DEFENDANTS and agents and/or employees, and each of them, were in a position
5 of authority, trust, influence and persuasion over PLAINTIFFS and responsible for maintaining
6 a special relationship.

7 63. THE ABUSERS and DOES 1-500's abuse of PLAINTIFFS was an abuse of their
8 authority as an agent and/or employee of DEFENDANTS and agents and/or employees and
9 performed while in the course and scope of their employment under color of law.

10 64. PLAINTIFFS' trust in DEFENDANTS and agents and/or employees for their
11 safety and wellbeing, turned to fear and intimidation by virtue of DOES 1-500 and DEFENDANTS
12 and agents and/or employees' wrongful conduct.

13 65. PLAINTIFFS contend said misconduct was authorized, ratified, adopted and/or
14 approved of by DEFENDANTS and agents and/or employees.

15 66. DEFENDANTS and agents and/or employees conduct as alleged herein was
16 beyond the bounds of decency accepted within society and was intentional, outrageous, malicious,
17 and committed for the purpose of causing PLAINTIFFS to suffer humiliation, embarrassment,
18 mental anguish, and/or severe physical and/or emotional distress, or done in reckless disregard of
19 the probability of causing PLAINTIFFS to suffer humiliation, embarrassment, mental anguish,
20 and/or severe physical and/or emotional distress.

21 67. As a direct and proximate result of the conduct as herein alleged, PLAINTIFFS
22 have suffered great mental pain, embarrassment, humiliation, distress, anguish and suffering,
23 all to her damages in an amount according to proof at trial.

24 68. DEFENDANTS and agents and/or employees' conduct described herein was
25 intentional and malicious and done for the purpose of causing, or with the substantial certainty that
26 such conduct would cause, PLAINTIFFS to suffer humiliation, mental anguish, and emotional and
27 physical distress.

1 PLAINTIFFS' complaints of being sexually abused further violated PLAINTIFFS' constitutional
2 protections under California and the United States.

3 75. DEFENDANTS and agents and/or employees, knowingly, with gross negligence,
4 and in deliberate indifference to the Constitutional rights of citizens, maintain and permit an
5 official policy and custom of permitting the occurrence of the types of wrongs set forth
6 hereinabove and hereafter, including violation of PLAINTIFFS' Fourth and Fourteenth
7 Amendments to be free from an unlawful sexual abuse.

8 76. PLAINTIFFS contend that DEFENDANTS and agents and/or employees failed to
9 adhere to their own policies and procedures and/or failed to have any in the first place to prevent
10 this harm, including, but not limited to, the deliberately indifferent training of its officers and/or
11 employees in conducting, training, monitoring and supervising unlawful violations of professional
12 misconduct by way of color of authority such as:

- 13 a. Physical assault and abuse of inmates by officers, supervisors and/or other higher-
14 ranking officers with final policymaking authority for DEFENDANTS and agents
15 and/or employees that were subsequently poorly investigated and/or covered up by
16 DEFENDANTS and agents and/or employees.
- 17 b. Intentional violation of DEFENDANTS and agents and/or employees' supervision
18 policies and procedures by officers, supervisors and/or other higher-ranking
19 officers with final policymaking authority for DEFENDANTS and agents and/or
20 employees in order to avoid evidencing improper assault and abuse on citizens by
21 DEFENDANTS and agents and/or employees.
- 22 c. Sexual harassment, extortion and intimidation by officers, supervisors and/or other
23 higher-ranking officers with final policymaking authority for DEFENDANTS and
24 agents and/or employees.
- 25 d. Abuse and assault against inmates, minorities and citizens with disabilities by
26 officers, supervisors and/or other higher-ranking officers with final policymaking
27 authority for DEFENDANTS and agents and/or employees as part of an accepted
28

1 practice that were subsequently poorly investigated and/or covered up by
2 DEFENDANTS and agents and/or employees to avoid legal consequences.

3 e. Sexual abuse and assault against inmates in custody by officers, supervisors and/or
4 other higher-ranking officers with final policymaking authority for DEFENDANTS
5 and agents and/or employees as defined as cruel and unusual punishment deeply
6 offensive to human dignity and not part of the penalty that criminal offenders pay
7 for their offenses against society.

8 f. Failure to report or investigate allegations of sexual misconduct by Defendants
9 CALIFORNIA and CDCR who were required to do so, both under its own policies
10 and procedures, as well as under federal mandate by the Fourteenth Amendment,
11 and California law.

12 77. As a direct cause of DEFENDANTS and agents and/or employees' wrongful
13 conduct intended to and actually interfered with PLAINTIFFS' Constitutional Rights to be free
14 from gender discrimination, (b) free speech, (c) cruel and unusual punishment, and (d) Due Process
15 under the United States' Constitution, specifically the Fifth and Fourteenth Amendments.

16 78. PLAINTIFFS' rights pursuant to California *Civil Code* §52.1 were violated,
17 causing injuries and damages in an amount to be proved at the time of trial.

18 79. Due to the conduct of DEFENDANTS and agents and/or employees, and each of
19 them, PLAINTIFFS have been required to incur attorneys' fees and will continue to incur attorneys'
20 fees, and pursuant to California Civil Code § 52.1 are entitled to recovery of said fees.

21 80. In addition, DEFENDANTS and agents and/or employees acted willfully and
22 maliciously with the intent to harm PLAINTIFFS, and in conscious disregard of PLAINTIFFS'
23 rights, entitling PLAINTIFFS to punitive and/or exemplary damages, attorney's fees, other
24 damages pursuant to Civil Code section 52(b)(1), and a temporary restraining order or a
25 preliminary or permanent injunction ordering DEFENDANTS and agents and/or employees to
26 refrain from conduct or activities as alleged herein, stating "VIOLATION OF THIS ORDER IS

27 A CRIME PUNISHABLE UNDER SECTION 422.77 OF THE PENAL CODE," and other
28 such relief as the court deems proper.

1 **SIXTH CAUSE OF ACTION**

2 **VIOLATION OF UNRUH ACT (CIVIL CODE § 51)**

3 **(Against DEFENDANTS and DOES 1-500)**

4 81. PLAINTIFFS re-allege and incorporate by reference the allegations set forth above
5 herein.

6 82. PLAINTIFFS claim that DEFENDANTS and agents and/or employees denied,
7 aided or incited a denial of, and/or discriminated or made a distinction that denied full and equal
8 accommodations, advantages, facilities, privileges, and/or services to PLAINTIFFS, including, but
9 not limited to, violations under *Civil Code* 52.3 and 52.45.

10 83. PLAINTIFFS' civil rights were violated by DEFENDANTS and agents and/or
11 employees when through its agents, actors an employees, intentionally concealed complaints of
12 sexual abuse, molestation and harassment by THE ABUSERS and DOES 1-500 who had
13 unfettered access to sexually abuse PLAINTIFFS, by and through their position and color of
14 authority.

15 84. Despite its knowledge, Defendants CALIFORNIA and CDCR allowed inmates to
16 be in direct care, contact, supervision, control and direction of THE ABUSERS and DOES 1-500,
17 thereby exposing PLAINTIFFS to sexual abuse and denying each to full and equal access to safe
18 residential facilities, treatment and services.

19 85. A motivating reason for DEFENDANTS and agents and/or employees' conduct
20 was its perception of PLAINTIFFS' sexual orientation, gender, race, ancestry, and/or national
21 origin as Defendants CALIFORNIA and CDCR knew that their inmates were ordered to be
22 confined, and thus, would be unwittingly subjected to these unwarranted sexual assaults.

23 86. PLAINTIFFS contend that their sexual orientation, gender, race, ancestry and/or
24 national origin made him an easy susceptible target to discrimination and abuse by
25 DEFENDANTS and agents and/or employees.

26 87. As a direct cause of DEFENDANTS and agents and/or employees' conduct,
27 PLAINTIFFS' rights were violated, causing injuries, harm and damages in an amount to be proved
28 at the time of trial.

1 88. PLAINTIFFS contend that DEFENDANTS and agents and/or employees' conduct
2 was a substantial factor in causing PLAINIFFS' harm.

3 89. Due to the conduct of DEFENDANTS and agents and/or employees, PLAINTIFFS
4 have been required to incur attorneys' fees and will continue to incur attorneys' fees, all to
5 PLAINTIFFS' damage in a sum to be proved at trial.

6 **SEVENTH CAUSE OF ACTION**

7 **GENDER VIOLENCE (CIVIL CODE §52.4)**

8 **(Against Defendant DOES 1-500)**

9 90. PLAINTIFFS re-allege and incorporate by reference herein each and every
10 allegation contained above as though fully set forth and brought in this cause of action.

11 91. Defendant through acts and/or omissions committed sexual abuse and gender
12 violence on PLAINTIFFS in violation of *Penal Code* § 293 based, in part, on PLAINTIFFS'
13 gender that was both a physical intrusion and/or physical invasion of a sexual nature under coercive
14 conditions.

15 92. The alleged wrongful and elicit conduct was authorized, ratified and/or adopted
16 under color of authority by Defendants CALIFORNIA and CDCR'S actions and/or omissions to
17 act by way of its negligent hiring, supervision, and training of THE ABUSERS and DOES 1-500.

18 93. As a direct and proximate result of the sexual misconduct, PLAINTIFFS are
19 entitled to actual damages, compensatory damages, punitive damages, attorneys fees, injunctive
20 relief, any combination of those, or any other appropriate relief and costs pursuant to *Civil Code* §
21 52.4, against all DEFENDANTS.

22 **EIGHTH CAUSE OF ACTION**

23 **CONSTRUCTIVE FRAUD (Civil Code § 1573)**

24 **(Against Defendants and DOES 1-500)**

25 94. PLAINTIFFS re-allege and incorporate by reference herein each and every
26 allegation contained above as though fully set forth and brought in this cause of action.

1 95. PLAINTIFFS claim they were harmed because DEFENDANTS and agents and/or
2 employees, and each of them, misled them by failing to provide PLAINTIFFS with complete and
3 accurate information.

4 96. During PLAINTIFFS' commitment at CALIFORNIA and CDCR, DEFENDANTS
5 and agents and/or employees and PLAINTIFFS maintained a special relationship over
6 PLAINTIFFS' well-being and safety such that DEFENDANTS and agents and/or employees, and
7 each of them, provide rehabilitation services, education and supervision over these inmates *in loco*
8 *parentis* much like a teacher would in an academic situation and/or other qualified institutions for
9 correction and rehabilitation of inmates, thus establishing a confidential, fiduciary, and special
10 relationship with PLAINTIFFS.

11 97. DEFENDANTS and agents and/or employees, and each of them, were
12 PLAINTIFFS guardian for their wellbeing and safety through this established special relationship
13 in which they took affirmative responsibility to protect them against the wrongful and negligent
14 conduct described above, and in so doing, gained an advantage over PLAINTIFFS relating to their
15 safety, security in order to maintain their status as correctional facility of high moral ground and
16 reputation.

17 98. DEFENDANTS and agents and/or employees' special relationship with
18 PLAINTIFFS established a duty to:

- 19 a. Thoroughly investigate claims of sexual abuse against these PLAINTIFFS.
- 20 b. Maintain detailed hiring policies and procedures for screening appropriate
21 employees and/or agents to guard the safety and security of PLAINTIFFS against
22 this heinous sexual abuse while under color of authority.
- 23 c. Demonstrate proper supervision of all employees and/or agents of Defendants
24 CALIFORNIA and CDCR with adequate training on mandatory reporting
25 requirements with defined policies and procedures to look for improper and/or
26 reasonably suspicious conduct;

- 1 d. Avoid locale and access to PLAINTIFFS in isolated areas as a “safe-haven” for the
2 transmission of sexual abuse without adequate or actual supervision of those
3 secluded areas;
- 4 e. Refuse to THE ABUSERS and DOES 1-500 and other molesters, in positions of
5 trust and authority, within DEFENDANTS and agents and/or employees’
6 institutions;
- 7 f. Terminating individuals and criminal prosecuting those, including THE ABUSERS
8 and DOES 1-500 for sexual abuse under color of authority after holding themselves
9 out in public as being trustworthy and authoritative;
- 10 g. Avoid giving DEFENDANTS and agents and/or employees, and each of them,
11 positions of power within Defendants CALIFORNIA and CDCR and over inmates
12 within their unfettered and unmonitored control; and
- 13 h. Prosecuting for the sexual acts that THE ABUSERES and DOES 1-500 had
14 engaged in with PLAINTIFFS.
- 15 99. DEFENDANTS and agents and/or employees’ breach of their duties by:
- 16 a. Failing to report and conduct reasonable investigations of the sexual misconduct;
- 17 b. Failing to hire, supervise, and train incompetent individuals to maintain special
18 relationships with their wards with unrestrained access and control over their well-
19 being;
- 20 c. Failing to issue warnings about perpetrators in their camps and facilities that preyed
21 on inmates and were the subject of ongoing investigation;
- 22 d. Failing to have proper mechanisms and guards in place to prevent its employees
23 and/or agents from having isolated and uncontrolled time with inmates that
24 provided a secluded environment for which the sexual abuse to take place;
- 25 e. Not having, adopting, following, and/or conforming with any policies and
26 procedures for the hiring, control, supervision and training of Defendants
27 CALIFORNIA and CDCR employees and/or agents at its facilities;
- 28

1 f. Continuing to place inmates with DEFENDANTS and agents and/or employees
2 despite having prior complaints of sexual misconduct without safeguards and/or
3 remediation; and

4 g. Failing to provide PLAINTIFFS with a mechanism by which to make complaints
5 that would be heard and adjudicated regarding the sexual abuse without recourse,
6 retaliation or other forms of punishment and discipline.

7 100. DEFENDANTS and agents and/or employees misrepresentations, suppression and
8 concealment of acts did reasonably caused PLAINTIFFS to forbear on their rights and were
9 intended to mislead PLAINTIFFS from any knowledge or information about the commitment of
10 unlawful or sexual misconduct by THE ABUSERS and DOES 1-500, and others, and that there
11 was no need for them to take further action or precaution.

12 101. DEFENDANTS and agents and/or employees, and each of them, knew or should
13 have known at the time they misrepresented the true facts regarding the heinous sexual conduct
14 that resulted in misleading impressions preventing PLAINTIFFS from escaping the sexual
15 misconduct that induced others, such as benefactors and donors financially supporting Defendants
16 CALIFORNIA and CDCR, from learning of these facts thereby avoiding damage to reputation,
17 funding, power, and avoid civil and criminal liability.

18 102. DEFENDANTS and agents and/or employees, tortiously conspired with each other
19 in the perpetration of this fraud and misrepresentations by concealing, either through actual acts
20 or blind ignorance, the sexual misconduct of PLAINTIFFS under the color of authority of THE
21 ABUSERS and DOES 1-500.

22 103. PLAINTIFFS were induced to act or induced not to act, based upon the fraud and
23 misrepresentations and concealment of false fact that there were no allegations of criminal or
24 sexual abuse and that PLAINTIFFS were safe within their care, custody, control, and direction of
25 DEFENDANTS and agents and/or employees.

26 104. Through this fraud, DEFENDANTS and agents and/or employees impliedly
27 signified that THE ABUSERS and DOES 1-500 were safe and fit to provide inmates in their care,
28 control, custody, supervision, and direction, when they knew or should have known the facts were

1 contrary based upon prior suppressed information of numerous prior occasions of sexually,
2 physically, and mentally abused inmates in their custody.

3 105. Because of PLAINTIFFS' gender, and status as inmates, they were especially
4 susceptible and vulnerable to this egregious control and illicit misconduct.

5 106. DEFENDANTS and agents and/or employees had the duty to obtain and disclose
6 information relating to sexual misconduct and misrepresented, concealed, or failed to disclose the
7 information they knew or should have known about through reasonable investigation.

8 107. PLAINTIFFS justifiably relied upon DEFENDANTS and agents and/or employees
9 for information relating to sexual misconduct despite its inaccuracies and misrepresentations,
10 while DEFENDANTS and agents and/or employees acting in concert intended to or actual
11 concealed and defrauded others, including PLAINTIFFS regarding the information relating to the
12 sexual misconduct of THE ABUSERS and DOES 1-500 through a woeful lack of proper
13 investigation, supervision, and monitoring of misconduct with inmates in their care, custody and
14 control.

15 108. By so concealing and misrepresenting facts, DEFENDANTS and agents and/or
16 employees committed at least one act in furtherance of the conspiracy to the detriment of
17 PLAINTIFFS, and each of them.

18 109. As a direct and proximate result of the conduct of DEFENDANTS and agents
19 and/or employees, individually, jointly, and/or severally, PLAINTIFFS sustained injuries and
20 damages according to proof.

21 110. PLAINTIFFS further contend DEFENDANTS and agents and/or employees' acts
22 and/or omissions to act through fraud and concealment was willful and malicious with the intent
23 to harm PLAINTIFFS in conscious disregard of their rights, with ratification and authorization by
24 the officers, directors, and/or managing agents of DEFENDANTS and agents and/or employees,
25 such that it constitutes malice and/or oppression under California Civil Code section 3294 and
26 thereby entitles them to punitive damages according to proof.

27 **NINTH CAUSE OF ACTION**

28 **NEGLIGENCE**

1 **(Against DEFENDANTS and DOE1 through 500)**

2 111. PLAINTIFFS re-allege and incorporate by reference herein each and every
3 allegation contained above as though fully set forth and brought in this cause of action.

4 112. DEFENDANTS and agents and/or employees, and each of them, had a duty
5 through their special relationship with PLAINTIFFS to protect them from being sexual abuse
6 under color of authority by Defendants CALIFORNIA and CDCR employees and/or agents in the
7 course and scope of their agency. DEFENDANTS and agents and/or employees owed
8 PLAINTIFFS a special fiduciary relationship that law enforcement and/or persons in position of
9 authority dealing with vulnerable inmates committed to their custody, owe to protect them from
10 harm.

11 113. At all times prior to, during and subsequently, DEFENDANTS and agents and/or
12 employees knew and/or should have known that THE ABUSERS and DOES 1-500 did were
13 planning, conspiring and/or committing sexual abuse on PLAINTIFFS that had been entrusted to
14 them and instructed to provide for their safety, care and welfare.

15 114. DEFENDANTS and agents and/or employees breached their duties of care to
16 PLAINTIFFS by their acts and/or omissions to act in their failing to adequately hire, supervise,
17 monitor, control and train its employees and/or agents, including, but not limited to, THE
18 ABUSERS and DOES 1 through 500, which provided a controlled environment in which they
19 would sexually abuse inmates with ongoing and unrestricted secluded access to PLAINTIFFS.

20 115. DEFENDANTS and agents and/or employees, and each of them, further hide the
21 conduct from PLAINTIFFS, the public and other law enforcement agencies as part of a systemic
22 scheme of fraud and concealment to prevent others from leaving the truth of the ongoing and
23 pervasive sexual abuse occurring within the confined walls of Defendants CALIFORNIA and
24 CDCR facilities with defenseless inmates.

25 116. PLAINTIFFS also allege that DEFENDANTS and agents and/or employees, and
26 each of them, botched their duties and responsibilities of investigating and pursuing all information
27 of claimed sexual abuse and/or providing a safe platform for PLAINTIFFS to report the abuse
28

1 without threats or fear of violence of retaliation for reporting the sexual abuse against the very
2 individuals responsible for their protection.

3 117. DEFENDANTS and agents and/or employees breached their duty of care to
4 PLAINTIFFS which was the direct and proximate cause of their sexual abuse resulting in
5 significant permanent damages and harm according to proof.

6 **TENTH CAUSE OF ACTION**

7 **NEGLIGENT HIRING AND SUPERVISION**

8 **(Against DEFENDANTS and DOES 1-500)**

9 118. PLAINTIFFS re-allege and incorporate by reference herein each and every
10 allegation contained above as though fully set forth and brought in this cause of action.

11 119. PLAINTIFFS allege that at all times mentioned herein, THE ABUSERS and DOES
12 1-500 were an agents and employees of Defendants CALIFORNIA and CDCR, and performed
13 the acts herein while in the course and scope of their agency and employment of at the time of
14 the subject sexual abuse. Moreover, PLAINTIFFS contend said misconduct was authorized,
15 ratified, adopted and/or approved of by DEFENDANTS and agents and/or employees, and DOES
16 1-500, inclusive.

17 120. PLAINTIFFS also contend that Defendants CALIFORNIA and CDCR are
18 vicariously liable for the tortious sexual acts of other DEFENDANTS and agents and/or
19 employees, and each of them, flowing from his employment with DEFENDANTS and agents
20 and/or employees while acting in the course and scope of their employment as it: 1) may prevent
21 recurrence of similar tortious conduct because it creates a strong incentive for vigilance by those
22 in a position to guard substantially against the evil to be prevented, 2) would give greater
23 assurance of compensation to the victim; and 3) would spread the risk of loss among the
24 beneficiaries of the enterprise because of the substantial benefits that the community derives from
25 the lawful exercise of police power.

26 121. The employees and/or agents of DEFENDANTS and agents and/or employees
27 have a special relationship with PLAINTIFFS which imposes upon them an affirmative duty to
28 take reasonable steps to protect them from reasonably foreseeable risks of harm.

1 122. THE ABUSERS and DOES 1-500 were in a position of authority, trust, influence
2 and persuasion over PLAINTIFFS as employee and/or agent of Defendants CALIFORNIA and
3 CDCR, responsible for maintaining the special relationship with the general public, including
4 PLAINTIFFS.

5 123. THE ABUSERS and DOES 1-500's sexual abuse of PLAINTIFFS was an abuse
6 of their authority as an agent and/or employee of Defendants CALIFORNIA and CDCR.

7 124. The employees and/or agents of DEFENDANTS and agents and/or employees
8 failed to use reasonable care in hiring and supervising their employees and/or agents who had
9 actual and constructive knowledge and/or notice that the manner and means of hiring created a
10 dangerous environment for the general public, including PLAINTIFFS, and THE ABUSER and
11 DOES 1-500's acts and propensity to commit such acts. Nonetheless, Defendants
12 CALIFORNIA and CDCR employees and/or agents took no remedial steps to protect the public,
13 including PLAINTIFFS.

14 125. The employees and/or agents of DEFENDANTS knew or should have known that
15 employment practices which failed to screen or investigate employees and/or agents with
16 propensity to commit sexual abuse or improper touching would create a dangerous environment
17 for PLAINTIFFS.

18 126. The employees and/or agents of Defendants CALIFORNIA and CDCR knew or
19 should have known about THE ABUSER and DOES 1-500's sexual abuse and improper touching
20 of persons such as PLAINTIFFS. Despite such knowledge, DEFENDANTS' employees and/or
21 agents ignored and failed to investigate or remedy THE ABUSER and DOES 1-500's conduct in
22 any way, thereby placing the community at risk of harm, including PLAINTIFFS.

23 127. Despite the knowledge of DEFENDANTS' employees and/or agents, they
24 nevertheless negligently hired, retained, and supervised their personnel, including THE ABUSER
25 and DOES 1-500.

26 128. The employees and/or agents of Defendants CALIFORNIA and CDCR owed
27 PLAINTIFFS a duty to protect them from unlawful sexual abuse and touching. Defendants
28 CALIFORNIA and CDCR'S employees and/or agents knew or should have known that failure to

1 properly supervise their personnel and investigate their conduct would subject persons, such as
2 PLAINTIFFS, to an unreasonable risk of being unlawfully sexually abused and touched.

3 129. As a direct and proximate result of negligent hiring and/or supervision of
4 Defendants CALIFORNIA and CDCR employees and/or agents, PLAINTIFFS suffered and
5 continues to suffer injury damages in an amount according to proof.

6 **ELEVENTH CAUSE OF ACTION**

7 **NEGLIGENT TRAINING**

8 **(Against DEFENDANTS and DOES 1-500)**

9 130. PLAINTIFFS re-allege and incorporate by reference into this cause of action each
10 and every allegation set forth in each and every paragraph of this Complaint.

11 131. PLAINTIFFS allege that at all times mentioned herein, THE ABUSERS and DOES
12 1-500 were an agent and employee of DEFENDANTS and each other and that THE ABUSERS
13 and DOES 1-500 performed the acts herein while in the course and scope of their agency and
14 employment of said DEFENDANTS at the time of the subject incident.

15 132. Moreover, PLAINTIFFS contends said misconduct was authorized, ratified,
16 adopted and/or approved of by DEFENDANTS and agents and/or employees, THE ABUSERS
17 and DOES 1-500, inclusive.

18 133. PLAINTIFFS also contend that DEFENDANTS and agents and/or employees are
19 vicariously liable for the tortious sexual acts of THE ABUSERS and DOES 1-500 flowing from
20 their employment with DEFENDANTS while acting in the course and scope of his employment
21 as it: 1) may prevent recurrence of similar tortious conduct because it creates a strong incentive
22 for vigilance by those in a position to guard substantially against the evil to be prevented , 2) would
23 give greater assurance of compensation to the victim; and 3) would spread the risk of loss
24 among the beneficiaries of the enterprise because of the substantial benefits that the community
25 derives from the lawful exercise of police power.

26 134. The employees and/or agents of DEFENDANTS have a special relationship
27 with PLAINTIFFS, which imposes upon them an affirmative duty to take reasonable steps to
28 protect them from reasonably foreseeable risks of harm.

1 142. PLAINTIFFS re-allege and incorporate by reference into this cause of action each
2 and every allegation set forth in each and every paragraph of this Complaint.

3 143. The employees and/or agents of DEFENDANTS have with their citizens a
4 special relationship, which imposes upon them an affirmative duty to take reasonable steps to
5 protect its citizens from reasonably foreseeable risks of harm.

6 144. PLAINTIFFS allege that at all times mentioned herein, THE ABUSERS and DOES
7 1-500 were an agent and employee of Defendants CALIFORNIA and CDCR inclusive, and that
8 THE ABUSERS and DOES 1-500 performed the acts herein while in the course and scope of
9 their agency and employment at the time of the subject incident.

10 145. Moreover, PLAINTIFFS contend said misconduct was authorized, ratified, adopted
11 and/or approved of by DEFENDANTS and agents and/or employees, and that liability flows from
12 their employment with Defendants CALIFORNIA and CDCR while acting in the course and scope
13 of employment as it: 1) may prevent recurrence of similar tortious conduct because it creates a
14 strong incentive for vigilance by those in a position to guard substantially against the evil to be
15 prevented, 2) would give greater assurance of compensation to the victim; and 3) would spread the
16 risk of loss among the beneficiaries of the enterprise because of the substantial benefits that the
17 community derives from the lawful exercise of police power.

18 146. THE ABUSERS and DOES 1-500 were in a position of authority, trust, influence
19 and persuasion over PLAINTIFFS. THE ABUSERS and DOES 1-500 were an agent of
20 Defendants CALIFORNIA and CDCR, responsible for maintaining the special relationship with
21 the community, including PLAINTIFFS.

22 147. THE ABUSERS and DOES 1-500'S sexual abuse of PLAINTIFFS was therefore
23 also an abuse of their authority as an agent of Defendants CALIFORNIA and CDCR.

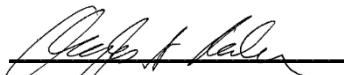
24 148. The employees and/or agents of DEFENDANTS breached their duty to protect
25 its citizens, including PLAINTIFFS, from reasonably foreseeable risks of sexual abuse when it
26 failed to use reasonable care in hiring and/or supervising and/or training its employees and/or
27 agents from reasonably foreseeable risks of sexual abuse and touching and detect and report
28 reasonable suspicion of sexual abuse and improper touching.

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- h. For prejudgment and post-judgment interest according to any applicable provision of law in an amount to be proven at trial but in no event less than the minimum jurisdictional amount of this Court on all causes of action; and
- i. For such further other relief as the Court may deem just, proper, and appropriate.

Dated: December 20, 2023

ABIR COHEN TREYZON SALO, LLP

By: 
Douglas A. Rothen, Esq.
Schyler S. Katz, Esq.
Attorneys for PLAINTIFFS

1 **DEMAND FOR JURY TRIAL**

2 PLAINTIFFS hereby demand a jury trial in the instant action on all stated claims for relief.

3
4 Dated: December 20, 2023

ABIR COHEN TREYZON SALO, LLP

5
6 By:



Douglas A. Rothen, Esq.

Schyler S. Katz, Esq.

Attorneys for PLAINTIFFS