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8 Attorney of Record on Welf. & Inst. Code section  
602 petitions for some "Youth Detained in  
9 Juvenile Halls and Camps in Los Angeles  
County," Petitioners

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF LOS ANGELES

12 EDMUND D. EDELMAN CHILDREN'S COURT, DEPARTMENT 416

13  
14 Center for Juvenile Law and Policy, and  
15 Independent Juvenile Defender Office

16 On behalf of,

17 ALL YOUTH DETAINED IN JUVENILE  
HALLS AND CAMPS IN LOS ANGELES  
18 COUNTY

19 Petitioners,

20 vs.

21 SUPERIOR COURT OF LOS ANGELES  
COUNTY,

22 Respondent,

23 COUNTY OF LOS ANGELES,  
24 PEOPLE OF THE STATE OF CALIFORNIA,

25 Real Parties in Interest.

LASC Case No.: JW2020-01

**BRIEF IN SUPPORT OF PETITION FOR  
WRIT OF MANDATE**

Judge: Brett Bianco  
Date: May 11, 2020  
Time: 1:30 a.m.

Petition Filed: April 15, 2020  
OSC Issued: April 28, 2020

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**TO: THE HONORABLE BRETT BIANCO, JUDGE OF THE SUPERIOR COURT:**

The Alternate Public Defender represents hundreds of justice-involved youth in the Los Angeles County juvenile delinquency courts on petitions filed under Welfare and Institutions Code section 602. Her deputies represent over 100 clients who are currently detained in the juvenile halls and camps throughout the county. In that capacity, the Alternate Public Defender submits this brief and asks this Court to grant the relief requested in the Petition for Writ of Mandate filed on April 14, 2020, by Petitioners, Center for Juvenile Law and Policy and Independent Juvenile Defender Office.

Dated: May 7, 2020

Respectfully Submitted,  
ERIKA ANZOATEGUI  
ALTERNATE PUBLIC DEFENDER

By: /s/ *Megan Gallow*  
MEGAN GALLOW  
DEPUTY ALTERNATE PUBLIC DEFENDER



1 **II. STATEMENT OF PROCEEDINGS**

2 On April 14, 2020, Petitioners, Center for Juvenile Law and Policy, hereinafter “CJLP,” and  
3 Independent Juvenile Defender Office, hereinafter “IJDO,” by and through their attorney, Patricia  
4 Soung, filed a Petition for Writ of Mandate, hereinafter “Petition,” in the California Supreme Court.  
5 Petitioners asked the California Supreme Court to issue a writ of mandate, commanding the Los  
6 Angeles Superior Court to “promote the immediate and substantial reduction of youth populations  
7 in halls and camps” and “ensure the safety and health of youth in juvenile halls and camps.” (See  
8 Petition, p. 37.) Petitioners requested numerous specific orders to be made to accomplish those  
9 objectives. (*Ibid.*)

10 On April 22, 2020, the California Supreme Court transferred the Petition to the Court of  
11 Appeal, Second Appellate District, with directions to issue an order to show cause returnable before  
12 the Los Angeles Superior Court addressing whether juveniles detained in Los Angeles County  
13 juvenile facilities are being denied due process under the Fourteenth Amendment by being held in  
14 conditions that could subject them to contracting the COVID-19 virus, and if so, what remedies can  
15 be lawfully ordered. The People of the State of California and the County of Los Angeles were  
16 deemed the real parties in interest.

17 On April 23, 2020, the Court of Appeal ordered real parties in interest to show cause in a  
18 return before the Superior Court addressing whether juveniles detained in Los Angeles County  
19 juvenile facilities are being denied due process under the Fourteenth Amendment by being held in  
20 conditions that could subject them to contracting the COVID-19 virus, and, if so, what remedies can  
21 be lawfully ordered.

22 On April 28, 2020, the Superior Court issued an order to show cause which noted that  
23 Probation is a real party in interest. The order directed the parties to address the following:

24 (1) the Court’s authority and jurisdiction to grant the relief prayed in the petition, e.g.,  
25 authority to make determinations regarding detention upon a standard different from that set forth  
26 in Welfare and Institutions Code section 635, 636, and 778;

27 (2) any matters related to the petition that are pending before the Court of Appeal or the  
28 Supreme Court, or have resulted in a determination by the Court of Appeal or the Supreme Court;

1 (3) the current conditions of the juvenile halls and camps, specifically, relating to the  
2 circumstances surrounding COVID-19;

3 (4) the probable effect or consequences of the release of minors in detention based on the  
4 criteria set forth in the petition on the health and safety of the minors and the public;

5 (5) the status of the parties' efforts to review and present to the Court individual cases for  
6 release; and

7 (6) the existence of any alternative remedies.

8 This brief will address issues that relate to the conditions of confinement and suggest an  
9 alternative remedy.

10 **III. THE CURRENT CONDITIONS IN JUVENILE HALLS AND CAMPS DO NOT**  
11 **EFFECTIVELY MITIGATE AGAINST THE SPREAD OF THE COVID-19 VIRUS**

12 Probation has devised several measures to help prevent and mitigate against the spread of  
13 the COVID-19 virus in their juvenile halls and camps. Unfortunately, not all of the new protocols  
14 and procedures have been, and in some cases cannot be, implemented effectively across all  
15 Probation-run facilities. Consequently, youth in Los Angeles County detention facilities are being  
16 denied due process under the Fourteenth Amendment by being held in conditions that could subject  
17 them to contracting the COVID-19 virus.

18 **A. Probation Has Not Implemented Social Distancing Protocols**

19 Probation has not effectively implemented social distancing guidelines at Los Angeles  
20 County juvenile facilities. (See Probation's Return to Petition for Writ of Mandate, filed on May 5,  
21 2020, hereinafter "Probation's Return," pp. 6, 11.) Contrary to Probation's claims, youth report  
22 that many of their hall units and camp dorms house more than the recommended maximum of six  
23 youth. When discussing the reality of social distancing measures in the halls and camps, the  
24 majority of youth represented by the Alternate Public Defender reported that the guidelines are not  
25 enforced.

26 Not all juvenile facilities are "staggering meals and requiring youth to sit at different tables  
27 from one another." (Probation's Return, p. 11.) Only half of the youth reported efforts by staff to  
28 implement social distancing during meals. Youth in some locations confirmed that one seat is kept

1 empty between each youth while sitting at the table. However, other youth reported that they still  
2 sit directly next to each other during meals on seats that are permanently attached to the tables. This  
3 leaves a substantial number of youth with no ability to maintain a safe distance from other youth.

4 Maintaining proper social distance while sleeping is incredibly difficult in juvenile camps.  
5 Youth detained in juvenile halls sleep in individual cells; however, those in the camp facilities sleep  
6 in military-dorm-style settings with about 4 feet between each bed. (See Probation’s Return, pp.  
7 11, 12.) In part, this is due to the fact that the furniture is bolted to the ground. Recently, some  
8 youth reported that there is now an empty bed between them and the next youth.

9 Social distancing guidelines are not enforced during day-room activities or recreation time.  
10 Contrary to the assertion made by Probation, no youth reported that staff is staggering times to watch  
11 television and play games. (See Probation’s Return, p. 11.) Youth indicate that they sit in close  
12 proximity to each other while engaging in day-room activities. During recreation, youth report  
13 playing basketball, handball, or throwing a football around. Contrary to the assertion made by  
14 Probation, no youth indicated that group exercise is limited to six youth at a time. (*Ibid.*) During  
15 these activities they come into contact with each other and, obviously, the equipment.

16 Social distancing efforts are thwarted when youth are transferred between Probation-run  
17 facilities. Jennifer Kaufman, Bureau Chief of the Residential Treatment Services Bureau for  
18 Probation, asserts in her declaration that under Probation’s COVID-19 Operations Plan, “all  
19 movement between the halls and camps has been temporarily suspended.” (See Probation’s Return,  
20 Exhibit A, p. 4.) While the Alternate Public Defender agrees that there was a short temporary  
21 suspension of movement in April, she asserts that her clients have been, and currently are being,  
22 transferred between juvenile halls and camps during the COVID-19 virus pandemic. Comments  
23 from youth indicate that there is widespread movement as units close due to a decreasing population.  
24 In addition, when the juvenile court has made disposition orders for a camp community placement,  
25 youth are being transferred.

26 **B. The Use of Personal Protective Equipment is Inconsistent in Juvenile Facilities**

27 In congregate settings, personal protective equipment is essential to curtail the spread of the  
28 COVID-19 virus. Probation asserts that its staff is required to wear N-95 masks when working inside

1 juvenile halls and camps. (See Probation’s Return, p. 13.) According to the youth represented by  
2 the Alternate Public Defender, staff are now consistently wearing masks. Probation asserts that  
3 youth detained in camps have been provided with several cloth masks that are washed regularly and  
4 youth in halls are provided with a surgical mask that is replaced daily. (*Ibid.*) The practice of  
5 distributing masks seems to vary widely between facilities. No youth reported receiving a new  
6 disposable mask daily. Some youth reported that they are provided a new disposable mask every  
7 other day and others reported that the frequency was one new mask per week. A few youth reported  
8 that if a mask is damaged or lost, it is not immediately replaced.

9 Probation asserts that staff are required to wear gloves when touching a youth and that the  
10 youth are provided gloves when handling food or cleaning. (See Probation’s Return, p. 13.) Youth  
11 report that staff wear gloves only in some of the facilities. Some youth have reported being provided  
12 with gloves, but the majority have not. It is unclear whether those youth were engaged in cleaning.

13 **C. Medically Fragile Youth and Non-Violent Offenders Remain in Juvenile Hall**

14 In a letter submitted to the Board of Supervisors on April 9, 2020, Probation asserted that  
15 the only medically fragile youth who were detained in their facilities consisted of four pregnant  
16 girls.<sup>1</sup> However, the term “medically fragile” in relation to the COVID-19 pandemic encompasses  
17 much more than pregnancy. The Centers For Disease Control and Prevention, “the CDC,” advises  
18 that people with asthma, severe obesity, chronic lung disease, diabetes, serious heart conditions,  
19 chronic kidney disease being treated with dialysis, liver disease, and those who are  
20 immunocompromised are at higher risk for severe illness if infected with the COVID-19 virus.<sup>2</sup>

21 In their Return, Probation asserts “there are currently no detained youth who have a  
22 compromised immune system...” (Probation’s Return, p. 8.) Although that may be true, Probation  
23 failed to address youth detained in their facilities who have an underlying medical condition. The  
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25 <sup>1</sup> Letters from Ray Leyva to the Board of Supervisors, *Efforts to Prevent Covid-19 Among Justice-*  
26 *Involved Populations (Item No. 13, Agenda of March 31, 2020)* (April 9, 16, 21, 24, and 30, 2020)  
< <http://file.lacounty.gov/SDSInter/bos/supdocs/144977.pdf>>

27 <sup>2</sup> Centers for Disease Control and Prevention, *Coronavirus Disease 2019 (COVID-19), Groups at*  
28 *Higher Risk for Severe Illness*, <<https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/groups-at-higher-risk.html>> (as of May 5, 2020.)

1 Alternate Public Defender represents several youth with a documented history of asthma and who  
2 have regularly used an inhaler while in detention. Out of 112 youth interviewed between March 30,  
3 2020, and April 10, 2020, 35 youth reported a diagnosis of asthma, 27 of those youth reported using  
4 an inhaler regularly while detained. The majority of those youth reported that a nurse maintains  
5 control of their inhaler. Consequently, Probation has records of these “medically fragile” youth and  
6 chose not to include them in their letters to the Board of Supervisors and in their Return.

7 A large percentage of the youth detained in Probation-run facilities are non-violent  
8 offenders. Ms. Kauffman asserts in her declaration that “only youth arrested for crimes that require  
9 mandatory detention are being admitted and held at juvenile halls” and that “all other youth are  
10 being screened by the District Attorney and Public Defender prior to their detention hearings.” (See  
11 Probation’s Return, Exhibit A, p. 4.) These statements are incorrect. Welfare and Institutions Code  
12 section 625.3 defines the mandatory category of minors that must remain in Probation’s custody  
13 pending a detention hearing. It states, “...a minor who is 14 years of age or older and who is taken  
14 into custody by a peace officer for the personal use of a firearm in the commission or attempted  
15 commission of a felony or any offense listed in subdivision (b) of Section 707 shall not be released  
16 until that minor is brought before a judicial officer.” (Welf. & Inst. Code § 625.3)

17 During the pandemic, the Alternate Public Defender has been appointed at detention  
18 hearings to represent youth that fall outside of that definition. Shawn N. Randolph, Head Deputy  
19 District Attorney of the Juvenile Division, stated in her declaration attached to the District  
20 Attorney’s Return to Petition of Writ of Mandate, hereinafter “District Attorney’s Return,” that only  
21 49.6% of youth currently housed in a camp facility committed offenses listed under Welfare and  
22 Institutions Code section 707, subdivision (b). (District Attorney’s Return, Exhibit A, p. 11.)  
23 Appallingly, there are still four youth detained (as of April 17, 2020) for misdemeanor offenses.  
24 (*Ibid.*) Ms. Randolph also represented that Probation has determined that 35% of the youth currently  
25 detained in juvenile camps would not pose a public safety risk if released early from camp. (*Id.* at  
26 p. 13.) At no point during the pandemic has the Alternate Public Defender participated in any  
27 screening of youth being held in Probation’s custody prior to a detention hearing.

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1 A COVID-19 virus outbreak in the juvenile halls and camps will endanger the lives of youth,  
2 facility staff, families of the staff, and the broader public. This risk has caused medical professionals  
3 to call on state governors, courts and detention facilities to “[i]mmediately release children in  
4 detention...who can safely return to the home of their families and/or caretakers.”<sup>3</sup> As of May 4,  
5 2020, 19 Probation staff members have tested positive for the COVID-19 virus. (See Probation’s  
6 Return, p. 8.) As a result, at least 65 youth have spent time in quarantine.<sup>4</sup> Although no youth has  
7 tested positive for the COVID-19 virus, only 21 out of 556 youth have been administered a test: that  
8 is only 3.75% of the population. (*Id.* at pp. 6, 7.) Holding medically fragile and non-violent  
9 offenders who pose no public safety risk under the current conditions in Probation-run facilities  
10 denies those youth due process under the Fourteenth Amendment.

11 **D. Detained Youth are not Receiving Adequate Education**

12 Detained youth are not receiving adequate education during the pandemic. The Alternate  
13 Public Defender has made a sustained effort to stay apprised of the educational opportunities  
14 afforded to detained youth. Probation asserts that they are working to enhance educational services  
15 through the use of videoconferencing and other technologies and they claim that online remote  
16 learning is now live at all facilities.. (See Probation’s Return, pp. 15, 19.) However, comments  
17 from youth indicate that online learning is currently utilized only at Campus Kilpatrick and some  
18 units within Barry J. Nidorf Juvenile Hall.

19 The majority of youth did indicate that they have been told virtual learning will soon be  
20 implemented. However, for the last several weeks, the majority of students have been provided  
21 with educational packets to complete and are receiving no instruction. (*Id.* at p. 18.) Probation staff  
22 have been tasked with reviewing completed educational packets. (*Ibid.*) Most youth report that the  
23 packets are not tailored to their skill level. Probation seemingly tries to justify this method of  
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25 <sup>3</sup> Letter from Physicians for Criminal Justice Reform to State Governors, State and Local Juvenile  
26 Detention and Correctional Departments, and Juvenile Court Judges and Magistrates (March 22,  
2020) <<https://njdc.info/wp-content/uploads/PFCJR-Statement.pdf>>

27 <sup>4</sup> Letters from Ray Leyva to the Board of Supervisors, *Efforts to Prevent Covid-19 Among*  
28 *Justice-Involved Populations (Item No. 13, Agenda of March 31, 2020)* (April 9, 16, 21, 24, and  
30, 2020) < <http://file.lacounty.gov/SDSInter/bos/supdocs/144977.pdf>>

1 educating youth by stating that students attending “other school districts within Los Angeles County  
2 have shifted to in-home learning for the remainder of the school year.” (*Id.* at p. 19.) While  
3 technically accurate, this statement is misleading because students at other school districts within  
4 Los Angeles County are currently being taught by their teachers via videoconference platforms.<sup>5</sup> It  
5 is imperative that all detained youth have access to a live teacher and be given lessons and  
6 assignments that are appropriate for their level of achievement.

7 **E. Detained Youth do not have Access to Adequate Mental Health Services**

8 Receiving appropriate and adequate mental health care is essential for youth to achieve their  
9 rehabilitative goals. Probation claims that the Department of Mental Health, “DMH,” is still  
10 providing in-person mental health evaluation, treatment, and therapy at juvenile halls and camps.  
11 (See Probation’s Return, p. 16.) This statement is misleading: Probation admits that in-person  
12 mental health services are reserved for “youth for whom mental health treatment is essential” and  
13 that for “less urgent appointments, remote treatment and therapy is being conducted telephonically.”  
14 (*Id.* at p. 17.)

15 It is unclear how Probation and DMH define “essential.” Regardless, the Alternate Public  
16 Defender asserts that youth are being denied access to adequate mental health services during the  
17 pandemic. Every youth represented by the Alternate Public Defender, who receives mental health  
18 services, indicated that they have received only brief phone check-ins from their therapists.  
19 Although Probation indicates that they have installed infrastructure that will allow youth to have  
20 videoconference mental health therapy session with DMH doctors and counselors, it has not yet  
21 transpired. (*Id.* at pp. 6, 18.) It is unclear whether DMH plans to utilize videoconference therapy  
22 sessions with youth whose mental health needs have been deemed “less urgent.”

23 **F. Youth are not Given Adequate Access to Family and Loved Ones**

24 A large part of the court’s rehabilitative effort for each youth focuses on building healthy  
25 relationships with family and loved ones. This is often implemented through family therapy sessions  
26 while a minor is detained. The Alternate Public Defender agrees that the suspension of in-person

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28 <sup>5</sup> See, e.g., Los Angeles Unified School District’s website, *Resources For Families During School Closure* < <https://achieve.lausd.net/resources>> (As of May 5, 2020.)

1 visitation is essential during the pandemic. To counter-balance this loss, Probation claims that youth  
2 have been given three free phone calls per week to maintain family contact. (Probation’s Return, p.  
3 20.) Youth in the juvenile camps have reported that this is accurate; however, youth in juvenile  
4 halls have reported that they are allowed only one 10-minute phone call per week. Several youth  
5 have reported that phone calls are withheld for allegations of misbehavior. (*Id.* at p. 21.) No youth  
6 reported knowledge of the Google Duo computer-based platform or the availability of iPhones for  
7 Facetime calls. (*Id.* at pp. 20-21.)

8 **IV. PROBATION SHOULD EXERCISE ITS DISCRETION TO RELEASE YOUTH**  
9 **UNDER GOVERNMENT CODE SECTION 8658**

10 As an alternative remedy, this Court can affirm Probation’s inherent power under  
11 Government Code section 8658 to release youth from its detention facilities during the pendency of  
12 the COVID-19 virus pandemic. Government Code section 8658 gives the Probation Officer  
13 authority to release youth in any case in which an emergency endangers their lives if housing them  
14 in a safe place is not possible. The Office of the Attorney General released an information bulletin  
15 on April 14, 2020, addressed to all California Sheriffs and Probation Officers opining that  
16 Government Code section 8658 applies to juvenile detention facilities.<sup>6</sup> Despite the fact that the  
17 Attorney General is the state’s top lawyer and law enforcement official, Probation has taken the  
18 position that release decisions must be ordered by the juvenile court. (See Probation’s Return, pp.  
19 7, 24.) They are incorrect.

20 The Probation Officer is in a unique position to determine whether a young person should  
21 be released in order to protect them against any unsafe condition caused by the COVID-19 virus.  
22 Probation Officers, not bench officers, are required under the Welfare and Institutions Code to  
23 determine whether youth delivered to their custody should, or must, remain detained. (Welf. & Inst.  
24 Code §§ 628, 628.1, 629.1.) The District Attorney and Probation omit this fact in their Returns.  
25 Shockingly, their arguments imply that it is solely within the purview of a juvenile bench officer to  
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27 <sup>6</sup> State of California Department of Justice, Office of the Attorney General, Xavier Becerra,  
28 *Information Bulletins, COVID-19 and Statutory Authority Under Government Code Section 8658*  
(April 14, 2020) < <https://oag.ca.gov/sites/all/files/agweb/pdfs/publications/2020-dle-05.pdf?>>.

1 make detention determinations. In fact, it is only *after* the Probation Officer makes the decision to  
2 keep a young person detained that a bench officer reviews that decision by holding a detention  
3 hearing under Welfare and Institutions Code section 632. There is no reason to believe that  
4 Probation is not equipped to employ a similar evaluative process when exercising their power  
5 under Government Code section 8658. This Court should encourage them to do so.

6 **V. CONCLUSION**

7 Probation has adopted many guidelines to mitigate against the spread of the COVID-19 virus  
8 within its juvenile halls and camps. Unfortunately, the implementation of those guidelines varies  
9 significantly between each of its facilities. As a result, youth in Los Angeles County detention  
10 facilities are being denied due process under the Fourteenth Amendment by being held in conditions  
11 that could subject them to contracting the COVID-19 virus. Therefore, the Alternate Public  
12 Defender asks this Court to grant the relief requested in the Petition.

13  
14 DATED: May 7, 2020

ERIKA ANZOATEGUI  
ALTERNATE PUBLIC DEFENDER

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16 By: /s/ *Megan Gallow*  
17 MEGAN GALLOW  
18 DEPUTY ALTERNATE PUBLIC DEFENDER  
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# EXHIBIT A

## Declaration of Cesar Sanchez

EXHIBIT A

**DECLARATION OF CESAR SANCHEZ**

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I, Cesar Sanchez, hereby declare under the penalty of perjury that the following is true and correct:

1. I am an attorney licensed to practice in the State of California. I am employed by the Los Angeles County Law Offices of the Alternate Public Defender. I am the Division Chief in charge of the Juvenile Division of that office. In that capacity, I manage our operations in all of the juvenile delinquency courts in Los Angeles County.
2. Beginning on March 18, 2020, I have participated in meetings with Judge Lawson, Supervising Judge of the Los Angeles County Delinquency Courts, and representatives of the District Attorney’s Office, Public Defender’s Office, the Independent Juvenile Defender Office, and Los Angeles County Probation regarding the effects that the COVID-19 virus has had on justice-involved youth and court operations.
3. As a way to monitor the safety of the Alternate Public Defender’s detained juvenile clients during the COVID-19 virus pandemic, I created a team comprised of three deputy alternate public defenders and three psychiatric social workers and tasked them with maintaining regular contact with detained clients regarding the effects that the COVID-19 virus has had on their conditions of confinement. To accomplish this task, an interview form was created that solicited the following information:
  - a. Whether and what the client had been told about the COVID-19 virus;
  - b. The existence of any underlying health condition and whether the client has been receiving treatment;
  - c. Any current symptoms consistent with the COVID-19 virus;
  - d. Current sleeping arrangement;
  - e. Access to soap, water, hand sanitizer and/or disinfecting wipes;
  - f. Changes in facility cleaning routines;
  - g. Implementation of social distancing measures;
  - h. Access to and form of education;

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- i. Access to and method of receiving mental health services; and
  - j. Opportunities to stay in touch with their family.
4. To date, the team has conducted over 250 interviews with a total of 124 clients.
5. Follow-up interviews were conducted by the deputy alternate public defender assigned to represent the client if individualized conditions of confinement and/or health-related concerns reported by a team member warranted a more in-depth investigation.

Executed on this 7<sup>th</sup> day of May, 2020, at Los Angeles, California.

/s/ *Cesar Sanchez*  
Cesar Sanchez

**DECLARATION OF ELECTRONIC SERVICE**  
**CASE JW2020-01**  
**ALL YOUTH DETAINED IN JUVENILE HALLS AND CAMPS**  
**IN LOS ANGELES COUNTY V. SUPERIOR COURT**

The undersigned declares under the penalty of perjury that the following is true and correct:

I am over eighteen years of age, not a party to the instant cause and employed as a Deputy Alternate Public Defender at the Law Offices of the Alternate Public Defender, located at 210 W. Temple Street, 18<sup>th</sup> Floor, Los Angeles, California, 90012.

On this date, May 7, 2020, I served the attached document titled “Brief in Support of Petition for Writ of Mandate” via electronic mail to the following recipients at the following e-mail addresses prior to the 1:30 p.m. filing deadline set by the court:

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Executed on this 7<sup>th</sup> day of May, 2020, at Los Angeles, California.

/s/ *Megan Gallow*  
\_\_\_\_\_  
MEGAN GALLOW