

**FILED**  
Superior Court of California  
County of Los Angeles

**NOV 14 2022**

Sherr R. Carter, Executive Officer/Clerk of Court  
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Cristina Grijalva

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*Attorneys for Plaintiffs*

*\*Pro Hac Vice applications forthcoming*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

23 Phillip Urquidi, Daniel Martinez, Susana  
Perez, Terilyn Goldson, Gerardo Campos, and  
24 Arthur Lopez, on behalf of themselves and all  
other similarly situated, and Clergy and Laity  
25 United for Economic Justice ("CLUE"),  
Reverend Jennifer Gutierrez, Reverend Gary  
26 Williams, and Rabbi Aryeh Cohen,  
individually,

Plaintiffs,

vs.

Case No. **22STCPO4044**  
**DECLARATION OF SUSANA PEREZ**

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City of Los Angeles, Los Angeles County, Los Angeles County Sheriff's Department, Sheriff Alex Villanueva, Los Angeles Police Department, and Chief Michel R. Moore,

Defendants.

11/14/2022

## DECLARATION OF SUSANA PEREZ

- ① My name is Susana Perez I am 48 years old and I live in Los Angeles.
- ② I was arrested on Wednesday and taken to Van Nuys jail.
- ③ I was given a pink piece of paper that says my bail was set at \$70,000.
- ④ I have been incarcerated since Wednesday because I cannot afford to pay bail.
- ⑤ If I could pay and get out right away, I would.
- ⑥ I do not have anyone else who can bail me out right now. I don't think my family can afford to bail me out. I tried to call them to ask but it is sometimes hard to reach them.
- ⑦ No one from the jail or the LAPD told me why my bail is set at that amount. I don't know who decides that or how. All they told me is that it's because of a felony.

⑧ No one told me about any other options for getting out of jail if I cannot afford to pay bail.

⑨ I had not heard about bail deviation until my attorney told me about it today.

~~⑩ No one told me about any other opt~~

⑩ I have not had any opportunity to speak with a judge or the probation department about my ability to afford bail.

⑪ I cannot afford to hire an attorney and I do not have a public defender yet for this case.

⑫ My boyfriend and I live out of our van. It is a struggle to take care of my basic needs.

⑬ I have received food stamps and welfare benefits but they were recently cut off because I did not complete the recertification paperwork on time.

(15) As soon as I can get out of jail, I need to complete my re-certification paperwork because I have no other regular source of income.

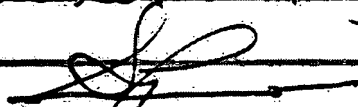
(16) Being in jail is holding up that process. It is also keeping me away from my family.

(17) When I suffer, my family suffers too.

(18) I want a safe and stable place to live and I want to help other people who struggle like me.

(19) I have helped my attorneys investigate my case. I want to represent people like me who are being kept in jail because they cannot afford to pay. I want to represent those people in a class action lawsuit.

I, Susanna Perez, declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

  
Signature

11/13/22  
Date

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