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18 *Attorneys for Plaintiffs*

19 **Pro Hac Vice applications forthcoming*

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21 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

22 **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,

27 Plaintiffs,

28 vs.

FILED
Superior Court of California
County of Los Angeles

NOV 14 2022

Sherri R. Carter, Executive Officer/Clerk of Court
By C. Grijalva Deputy
Cristina Grijalva

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Case No.

22STCPO4044

**DECLARATION OF DANIEL
MARTINEZ**

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

4 Defendants.
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11/14/2022

Declaration of Daniel Martinez

1. My name is Daniel Martinez. I am 39 years old. I've lived in the San Fernando Valley most of my life and currently live in Sunland-Tujunga, which I consider home.
2. I was arrested for an alleged offense on Thursday, November 10. The officers who arrested me took me to the Foothill Police Station. Later that night, they brought me here, to the jail in the LAPD station in Van Nuys. I have been here ever since.
3. After I was booked I was given a pink piece of paper that says my bail is set at \$20,000. No one has discussed the bail with me or explained why it is set at \$20,000.
4. I asked an officer here at Van Nuys if I could be cited out. He said: No, you can bail out by paying the amount on the paper.
5. I cannot afford to pay \$20,000 to get released. I cannot even afford a fraction of this to pay a company. I called a bail bond company last night and they said they would not bond me out unless I could pay \$2,000 up front. I can't

6. No one has asked me if I have the ability to pay my bail amount.

7. I have often been homeless and struggle to pay for housing. Right now I live with friends and contribute to rent however much I can. I have been there close to a year, and my housemates and I are a tight-knit community. These friends have also struggled with being homeless and could not post my bond.

8. I don't have any family members who could bail me out. They couldn't afford it, either.

9. To support myself, I do odd jobs. I love working with my hands, and I'm good at it. I also have received food stamps this year.

10. I had an interview for a construction job scheduled for yesterday - Friday, November 11. The starting pay was \$17 an hour, going up to \$22. This job would have meant steady income and the chance to get an apartment.

11. I missed the interview because I am in jail.

12. I do not have any assets, a bank account, or savings.

13. ~~My~~ Besides rent, my expenses include child support, my phone bill and groceries, and supporting my close friend and housemate with a disability who can't work.

14. I also have debts - hospital bills, ~~debt~~ debt from college classes I took, and more.

15. I struggle to meet the basic necessities of life.

16. I learned that I could call a phone number to try to get my bail lowered from the lawyer taking my declaration. It was on the back of my pink slip. No one at the jail told me ~~about~~ about it.

17. I called the (800) number and got a message that said "This line has been disconnected." Then I tried the collect number, but no one answered.

18. That was yesterday. I tried again today and got through. I was asked my booking number. Then the lady told me I didn't qualify. I asked why. She didn't know. She never asked me if I could afford my bail, or anything

else besides my booking number.

19. I have not been given a public defender or the chance to talk to a judge. No one has even told me when I'm going to court. I don't know of any way to get out besides paying.

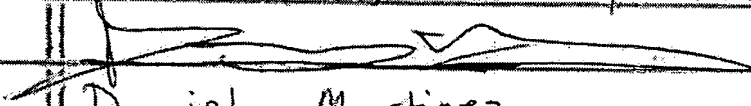
20. I want to get out. I have not been outside or felt the sun since I was arrested. They do not let us out, and there are no windows. The jail is dirty and cold.

21. I'm worried the job opportunity is gone and I want to get out as soon as I can so I can get in touch with them before the chance is gone.

22. If I could buy my release, I would.

23. I understand that this declaration will be used in a class action lawsuit. I have spoken to my attorneys and am prepared to be a class representative who advocates for the interests of all other people who are stuck in jail for the same reason as me - inability to pay.

I 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.


Daniel Martinez

Executed on this 12th day of November, 2022, in Los Angeles, CA.

11/14/2022

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14 **Pro Hac Vice applications forthcoming*