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18 *Attorneys for Plaintiffs*

19 **Pro Hac Vice applications forthcoming*

20 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

21 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

22
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.

Case No.

**DECLARATION OF TERILYN
GOLDSON**

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

Defendants.

Declaration of Terilyn Goldson

1. I am 37 years old. I was born in Hawaii and have lived in the Los Angeles_{area} for about 25 years.
2. I was arrested on Wednesday, November 9 at around 5:30pm and taken to Lakewood and then booked into CRDF that night. No one told me what I was being arrested for. ~~For~~
3. When I was booked into the jail, my clothes were taken from me and I was forced to wear a gown with velcro fasteners that does not cover me or keep me warm. I was placed in a section of the jail where there are people with mental health problems. It is impossible to sleep because people keep screaming. When I asked, they told me this was because they think I may be suicidal. I am not suicidal; I was just anxious when I was booked because I was recently assaulted and almost raped.
4. I was given a receipt for the property I had on me when I was arrested, but I don't recall getting any paperwork showing my charge or anything about my case.

5. No one here has told me anything about bail. I have since come to understand that I am being held on \$75,000 money bail. No one at the jail has asked me whether I have the means to pay that amount of money, and there's no way that I could. I can't even afford to pay a bail bond company a fraction of that amount.
6. No one I know can afford to pay my bail to get me released. I have family members who love me - my grandma, my dad and my aunt - but that's so much money I can't imagine how they would be able to help me.
7. I have two young children, ages 4 and 6. I try to see them as much as I can, but they now live with their father. I was making arrangements to see my children this weekend. But because I've been in jail since Wednesday, I missed that chance.

8. Before I had children, I worked as a paralegal for a law firm. But I struggle to make ends meet these days. I am on welfare and receive food stamps, and I am homeless. I have been homeless since June 2022, when I was evicted from my home.
9. I have mainly stayed in various tent communities since then, trying to stay safe and warm. Most recently I was sleeping in a tent near the Del Amo Blue Line. But I was assaulted and almost raped, so I tried to move to a shelter. But the shelter turned me away, ^{even though I had a referral,} because they had not received some paperwork from a supervisor. I have a case worker at the Multi service center (MSC). If I weren't in jail right now, I would be at the MSC trying to get housing.
10. In the time I've been here in jail, I have not been appointed a public defender, and no one has offered me the chance to talk to a judge.
11. If I could pay bail to be released, I would.

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12. I believe it is wrong for them to keep people in jail simply because they don't have enough money.
13. I understand that this declaration will be used for a class action lawsuit challenging the practice of jailing people because they can't afford bail. I have talked to my attorneys, and even once I am released from jail I am willing and prepared to serve as a class representative to seek justice for other people in Los Angeles County who had this happen to them. What I'm going through should not happen to anyone.

Executed on this 13th day of November, 2022, in
Los Angeles County

Terilyn Goldson

Terilyn Goldson

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14 **Pro Hac Vice applications forthcoming*