

EXHIBIT 1

Timeline of Reported Deaths at Monterey County Jail Since 2015

Date of Death <i>Reverse Chronology</i>	Name or Identification of Deceased Individual	Means of Death	Source
<p>June 9, 2023</p>	<p>J.G.¹</p>	<p>"A little after 3 p.m. on June 9, deputies found a 47-year-old man unresponsive in his cell... [he] was to a local hospital and pronounced dead at approximately 3:40 PM."</p>	<p>Chris Hagel, <i>Monterey County Jail inmate dies while in custody on Friday</i>, KSBW (Salinas) (Jun. 10, 2023), https://tinyurl.com/ywnkm8ed</p>
<p>May 22, 2023</p>	<p>M.M.²</p>	<p>"The deceased inmate, only identified as a 63-year-old man, was found unresponsive in his cell around 11 p.m. on Monday. He was pronounced dead at the scene by paramedics."</p>	<p>Josh Copitch, <i>63-year-old Monterey County Jail inmate's death under investigation</i>, KSBW (Salinas) (May 23, 2023), https://tinyurl.com/5tw5n2ep</p>

¹ Doc. 796.

² Doc. 792.

<p>April 7, 2023</p>	<p>Jimmy Hall</p>	<p>"Deputies began life-saving measures around 1:30 p.m. until fire and medical agencies arrived on the scene to take over. The inmate was then taken to the hospital to receive continued treatment but died approximately three hours later."</p>	<p>Kingston Rivera, <i>Monterey County Jail inmate dies in custody, investigation underway</i>, KSBW (Salinas) (Apr. 8, 2023), https://tinyurl.com/afvt6tsr</p>
<p>January 4, 2023</p>	<p>M.M.³</p>	<p>"On Jan. 4, just five days after newly elected Sheriff Tina Nieto was sworn in, a person in custody was discovered dead, from an apparent hanging, the Sheriff's Office reports."</p>	<p>Sara Rubin, <i>People are still dying inside Monterey County Jail</i>, Monterey County Weekly (Jan. 26, 2023), https://tinyurl.com/235s4vuh</p>
<p>November 12, 2022</p>	<p>David Sand</p>	<p>"According to [David Sand's father], Sheriff's detectives told him David was found in his jail cell unresponsive. Sand says detectives told him David had cut himself and it appeared he was attempting to write a message in blood on the wall. Sand does not know what was written. He was told photos were taken."</p>	<p>Pam Marino, <i>Another inmate dies at Monterey County Jail under uncertain circumstances</i>, Monterey County Weekly (Nov. 15, 2022), https://tinyurl.com/4txnpsv7</p>

³ Doc. 763.

April 20, 2022	Juan Carlos Chavez	"The Sheriff's Office was expected to release a statement with some additional details about Chavez's case on May 11, after the Weekly went to print. For now, they confirm that he was alone in a cell and believe he died from suicide. (Chavez's family disputes that official account and is calling for an investigation into his death.)"	Sara Rubin, <i>A crisis of deaths by suicide continues to plague the Monterey County Jail</i> , Monterey County Weekly (May 12, 2022), https://rb.gy/1hsvc
September 24, 2021	Sergio Gonzales	"Gonzalez tested positive for Covid on Sept. 19—five days after jail officials publicly acknowledged an outbreak and two days after cases jumped from 30 to 130—the lawsuit states. On Sept. 24 he had shortness of breath, chest pain and weakness, followed by unconsciousness. He was rushed to Natividad where he died in the emergency room. An autopsy ruled his death was due to complications of Covid."	Pam Marino, <i>Family sues Monterey County and sheriff Steve Bernal for death of inmate with Covid-19</i> , Monterey County Weekly (Sept. 19, 2022), https://tinyurl.com/mvjs6zhd
August 6, 2021	Thomas Pollacci	"Pollacci was found dead in his cell early in the morning of Friday, Aug. 6, according to a spokesperson for the Monterey County Sheriff's Department. Suicide is suspected, but an investigation into his death is underway."	Sara Rubin, <i>Convicted rapist found dead in Monterey County Jail while awaiting a hearing on whether to declare him a sexually violent predator</i> , Monterey County Weekly (Aug. 6, 2021), https://tinyurl.com/m8uv3mhs

June 6, 2021	Barry Sumagang	"Sumagang, who was arrested a day after the May 29 killing, was found hanging in his cell about 10pm Sunday night, according to Monterey County Sheriff's Office spokesman Cmdr. Darrell Simpson. Sumagang was in a single cell and found during a routine check."	<i>Suspect in workplace killing outside of Mann Packing Facility dies of apparent suicide in Monterey County Jail</i> , Monterey County Weekly (Jun. 8, 2021), https://tinyurl.com/2p9fh94x
March 19, 2021	Carlos Patino Regalado	"Her son, Carlos Patino Regalado, was in and out of jail and struggling with mental health issues. He was 22 when he was arrested on Feb. 16, 2021. He was placed on and off suicide watch and was alone in cell G104 when he was found hanging from an air flow grate. He was transported to the hospital, where he died six days later."	Sara Rubin, <i>A crisis of deaths by suicide continues to plague the Monterey County Jail</i> , Monterey County Weekly (May 12, 2022), https://tinyurl.com/2rb6st8s
December 22, 2019	Rafael Ramirez Lara	"On the day Lara died, the sound of his toilet flushing "over and over could be heard from the dayroom of the unit," the complaint noted. Lara could be heard coughing and vomiting as well. Witnesses stated that water was running under the cell door. MCJ staff noted the water, but no one made a welfare check on Lara. At approximately 12:12 p.m., he was discovered "face-down and unresponsive on the floor of his cell in a pool of fluid and blood." Lara was taken to the NMC and pronounced dead."	Casey Bastian, <i>\$775,000 Paid for Mentally Ill California Jail Detainee Who Compulsively Drank Water Until He Died</i> , Prison Legal News (Jun. 15, 2023), https://tinyurl.com/muebsrkz

June 2, 2019	Manuel Anthony Vasquez	"Vasquez was taken off life support at Natividad four days after he was discovered alone in a cell, his sister, Christina Vasquez, 46, said Monday. She said he was found in his cell at about 3 p.m. Thursday and jail staff notified her at 9:30 a.m. Friday that her brother was at Natividad."	Joe Szydowski, <i>Monterey County Jail inmate dies after hanging himself, deputies say</i> , Californian (Jun. 4, 2019), https://tinyurl.com/r9sncu9b
December 14, 2015	Lara Ann Gillis	"Gillis was arrested in Marina on Dec. 4, 2015, on suspicion of being under the influence of a controlled substance and resisting arrest. On Dec. 5 she was found unresponsive inside her county jail cell and taken to Natividad Medical Center, where she never regained consciousness before she died on Dec. 14."	Pam Marino, <i>Children of woman who died in custody will receive \$825,000 from county and medical provider</i> , Monterey County Weekly (Sept. 17), https://tinyurl.com/yn9rv45e
August 18, 2015: HERNANDEZ SETTLEMENT AGREEMENT ENTERED			
January 21, 2015	Mark Vasquez Pajas	"Jail staff also didn't perform adequate checks on Pajas, who was found face down in his own vomit at about 2:12 p.m., [the family's attorney] said. He was taken to Natividad, where he was pronounced dead, court records show. Medical experts testified he died from a cardiac event involving an arrhythmia, possibly exacerbated by substance abuse and underlying medical conditions."	Joe Szydowski, <i>Jury awards \$1.6M to family of Monterey County Jail inmate who died</i> , Californian (Feb. 7, 2019), https://tinyurl.com/mr28d7m4
May 23, 2012: HERNANDEZ COMPLAINT FILED			