

EXHIBIT C

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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 HUGO GONZALEZ, et al., on behalf of
themselves and all others similarly
12 situated,

13 Plaintiffs,

14 v.

15 The GEO Group, Inc., et al.

16 Defendants.
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Case No.: 2:22-cv-04014-JGB-ACCV

**DECLARATION OF STEPHEN
SINCLAIR IN SUPPORT OF
MOTION TO UNSEAL COURT
RECORDS**

Date: March 2, 2026

Time: 9:00 a.m.

Courtroom: 1 (Riverside)

Judge: Hon. Jesus G. Bernal

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DECLARATION OF STEPHEN SINCLAIR

I, Stephen Sinclair, declare under penalty of perjury as prescribed in 28 U.S.C. § 1746 that the following is true and correct:

I. Introduction & Summary of Qualifications

1. I am the CEO of the Justice & Liberty Group LLC. Public Justice has retained me in connection with *Gonzales v. The GEO Group*, Case No. 2:22-cv-04014, pending in the Central District of California. It is my understanding that this lawsuit revolves around a 2020 use-of-force incident inside the Adelanto ICE Processing Center.

2. Public Justice has retained me to provide expert opinions, based on my corrections experience, regarding what types of information, if disclosed, could compromise the safety and security of a carceral institution. In this matter, I have been retained at \$400 an hour. The independent opinions set forth herein are based on my personal and professional knowledge and are expressed to a reasonable degree of professional certainty. If called as a witness to testify, I could and would testify competently thereto.

3. My experience in adult corrections spans 32 years as an employee of the Washington State Department of Corrections (“WADOC”). I began as a Correctional Officer at the Washington State Penitentiary in September 1988 and concluded my career as the agency’s Secretary. I was appointed Secretary of WADOC in April 2017, confirmed by the Washington State Senate in January 2017, and served until May 2021.

1 4. During my career, I have led numerous significant changes within
2 WADOC, many, but not all, of which are highlighted in my Curriculum Vitae
3 (Attachment A).

4 5. Throughout my career, I helped shape policy and practice related to
5 safety and security. I served as a member of WADOC's Captain's Committee,
6 reviewing agency safety and security policies and implementing approved
7 changes at the facility level. For approximately four years, I served as co-chair
8 of the WADOC Statewide Security Advisory Committee, which comprised
9 staff from all levels of the organization and was responsible for evaluating
10 safety and security suggestions from line staff. Adopted changes were
11 incorporated into policy, procedures, and practice. The committee also served
12 as a sounding board for agency-initiated safety and security changes.

13 6. Throughout my career, beginning as a Correctional Investigator, I
14 received ongoing training in criminal investigation. This training included, but
15 was not limited to, instruction at the Washington State Patrol Investigators
16 Academy, the Walla Walla Reserve Police Officer Academy, and numerous
17 other investigator training courses provided by WADOC, the Washington
18 Criminal Justice Training Academy, and other organizations.

19 7. In addition to my work experience, I hold a Master of Public
20 Administration from the University of Washington. I have completed
21 thousands of hours of training sponsored by WADOC, the Washington State
22 Criminal Justice Training Academy, the Washington State Patrol Investigator
23 Academy, the Washington State Tactical Officers Association, and the Walla
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1 Walla Police Department. My experience includes training and hours worked
2 as a Reserve Police Officer with the Walla Walla Police Department.

3 8. I served four years as a Commissioner of the Washington State Criminal
4 Justice Training Academy (2017-2021), overseeing curriculum development
5 for basic academies in Law Enforcement and Corrections, as well as
6 certification standards. I also served four years as a member of the Washington
7 State Sentencing Guidelines Commission (2017-2022). I am an active member
8 of the Correctional Leaders Association (CLA) and the American Correctional
9 Association (ACA). I received the 2020 Tom Clements Award for Innovation
10 from CLA and was recognized by Washington Governor Christine Gregoire
11 in 2009 for excellence in management.

12 9. Since my retirement in May 2021, I have remained active in the
13 corrections field, researching, analyzing, and providing expert opinions in
14 cases involving confinement in city, county, and state-operated confinement
15 facilities. In summary, I have spent much of the past 37 years working with,
16 thinking about, and analyzing adult corrections, focusing on topics including,
17 but not limited to, the use of force, administrative segregation and restrictive
18 housing, prison regulations, correctional operations, and the policies required
19 to operate a safe and humane corrections system and facilities. My expert work
20 has been for both plaintiffs and defendants, and all case involvement during
21 my WADOC career was as a defendant.

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1 **II. Safety & Security in Corrections**

2 10.It is my understanding that the Court has sealed certain information in
3 this case because the defendant has argued that disclosing it would harm safety
4 and security at the detention center. As I understand it, that information
5 includes video footage, a use of force packet, and logs documenting activity
6 in certain dorms.

7 11.To evaluate these arguments, it is important to understand what the term
8 “safety and security” refers to. The term “safety and security” is widely used
9 in corrections; it is nearly a mantra. Correctional staff at all levels use this term
10 to describe their role in the organization or as a reminder to others to refer back
11 to the mission. Through my work as a corrections expert, I have often heard
12 the term used by corrections officials to shield documents from public view. I
13 believe this is unfortunate because it is often not based on genuine safety and
14 security concerns.

15 12.It is worth noting that although immigration detention is technically
16 outside of the “corrections” industry because it involves non-criminal
17 confinement, correctional practices relating to safety and security are equally
18 applicable in civil detention because both civil detention and criminal custody
19 present environments requiring total control over incarcerated people’s
20 movement.

21 13.In Washington State, where I served, I witnessed several legal changes
22 that expanded public disclosure laws, most of which were enacted decades
23 ago. I can clearly remember when these laws took effect and the opposition
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1 they faced. The first term we used was “safety and security” to protect
2 information we believed was vital to our mission. In hindsight, even our
3 arguments then were based on something other than sound logic. Now,
4 decades later, after having lived and worked through these changes, I
5 recognize the minimal impact nearly full disclosure has had on the actual
6 safety and security of the institutions and agencies where I worked. For
7 example, I recall the agency’s use-of-force policy being considered restricted
8 and not available for public viewing. The logic at the time was that disclosure
9 would jeopardize “safety and security” because we didn’t want people,
10 especially incarcerated people, to know all the tools in our toolbox. Over time,
11 that logic crumbled, and even this policy, which we held sacred, is now
12 available on the internet.¹

13 14. Generally, the term “safety” in a carceral setting refers to keeping staff,
14 the incarcerated, and anyone else interacting with a correctional setting safe
15 from unwarranted harm. This is influenced by external and internal safety
16 requirements governed by state and federal agencies (e.g., OSHA, Health
17 Departments, state agencies responsible for ensuring industrial safety). In a
18 carceral setting, operational practices such as movement control, adequate
19 staffing, a grievance system, a functional classification system, and the
20 availability of programming to engage the incarcerated population all
21 intertwine to create safer correctional environments. All correctional

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¹ See <https://www.atg.wa.gov/law-enforcement-use-force-and-de-escalation>.

1 institutions have the additional responsibility to protect those in their custody
2 and care from unreasonable or unjustified physical harm caused by other
3 incarcerated individuals and even staff. In my experience, what influences
4 safety is a broad topic, but what must remain confidential to ensure safety is
5 very narrow.

6 15. In corrections, the term “security,” like safety, is a core responsibility
7 of each staff member and the governing agency. Security involves policies,
8 practices, and a functioning physical plant to ensure incarcerated individuals
9 remain in custody for the period defined by the sentencing courts. It also
10 includes ensuring that incarcerated individuals have access only to items and
11 materials authorized for their use or possession. Everything else is considered
12 contraband.

13 16. “Safety and security” also encompasses a broad responsibility for all
14 criminal justice entities to prevent crimes, investigate when there is probable
15 cause to believe a crime has been committed, and bring to justice those who
16 have committed a crime. It is no secret that crimes are committed in
17 correctional settings, including crimes in our communities that are
18 orchestrated there. Incarcerated individuals and staff can and are engaged in
19 various criminal activities. There are limited circumstances in which exposure
20 of correctional intelligence and investigative matters can jeopardize a criminal
21 investigation and risk the loss of evidence. The public interest is served by
22 investigating these crimes, and there is a loose nexus between safety and
23 security because a lawless correctional facility is not safe or secure.

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1 17. In my opinion, “safety and security” are about keeping people safe from
2 harm, ensuring incarcerated individuals don’t escape custody or evade
3 criminal prosecution when a crime has been committed, and preventing
4 unauthorized items from reaching the incarcerated population. In my opinion,
5 when considering whether to share corrections-related information or
6 documents publicly, the questions to ask are:

7 *1. Will a person or people be physically harmed if this information is made*
8 *public?*

9 *2. Will this information legitimately contribute to an effort for an*
10 *incarcerated individual to escape from custody or any individual to evade*
11 *prosecution for crimes committed?*

12 *3. Will this information directly contribute to the introduction of*
13 *contraband into a correctional facility?*

14 If I had not answered yes to at least one of these questions, I would struggle to
15 understand the logic of concealing information from the public. As a former
16 public official, I recognize that publicly releasing some information can be
17 embarrassing and even lead to tort liability, but it does not follow that
18 disclosing such information would threaten the safety and security of a
19 carceral institution.

20 18. There are a minimal number of documents maintained by correctional
21 agencies that, if revealed to the public, could threaten the safety and security
22 of a correctional institution. What pieces of knowledge could an incarcerated
23 person obtain from the public domain that would threaten the safety and
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1 security of a correctional setting? This also must be balanced against (1) what
2 incarcerated people already know and could themselves share with the public
3 based on their observations and constant interactions with the system's rules
4 and staff that confine them, and (2) what can be relayed to them by free people
5 in the community with access to the vast knowledge of the internet. If the
6 incarcerated population knows it, it should be synonymous with the public
7 knowing it because communication goes both ways.

8 19. Based on my experience, my shortlist of information that will likely
9 have safety and security implications includes:

10 20. ***Confidential Informant Information.*** Information provided by an
11 incarcerated individual or a private citizen to correctional staff or law
12 enforcement to further or assist criminal or administrative investigations that
13 could lead to criminal prosecution should be considered confidential. In
14 correctional settings, the knowledge that someone is providing information to
15 officials greatly increases the likelihood of serious harm. This risk exists in
16 communities as well, but incarcerated individuals can't escape the
17 environmental threat. If an agency's knowledge of someone acting as a
18 confidential informant is revealed, it can and will follow the individual for the
19 remainder of their incarceration, placing them in constant jeopardy.

20 21. ***Detailed Schematics and Drawings.*** On rare occasions, detailed
21 schematics and drawings of a correctional facility's physical structure or
22 security systems can reveal vulnerabilities that could aid escape attempts. This
23 is a classic vulnerability often portrayed in dramatic movies and television.

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1 Unfortunately, some of these portrayals are based on actual events. Once
2 released, such information can't be controlled in today's digitized world, and
3 the vulnerability will persist. It is important to note that incarcerated people
4 can see a large percentage of the facility in their daily lives. Regulatory
5 requirements for the posting of fire exits in living and work areas mean that
6 incarcerated people have some degree of knowledge about schematics from
7 being in those areas. Still, they may not be able to see the potential escape
8 pathways that may exist in the utility infrastructure or ways to defeat security
9 systems from electrical diagrams. There is no harm in revealing what
10 incarcerated people already know.

11 **22. *Emergency Response Checklists/Plans.*** Some facilities and agencies,
12 like mine, may have developed a checklist or plan for staff that outlines
13 specific actions to be taken in any emergency, commonly called Emergency
14 Response Checklists or Plans. These checklists are generally topical,
15 addressing actions for emergencies such as earthquakes, power failures,
16 riots/disturbances, and hostage-taking. If disclosed, these documents could
17 compromise safety and security by revealing too many details about response
18 tactics in an organized crisis event, which could hamper an adequate response.
19 Disclosure of these documents should be reviewed on a case-by-case basis.

20 23. As an example, I have reviewed Bates 13226-0001 – 0005, which is the
21 GEO Emergency Plans Manual Correctional Emergency Response Team
22 (CERT) Activation Plan. This document outlines the detailed tactics used by
23 emergency responders. III Operating Procedures details their phased response
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1 plan, which, if revealed, could jeopardize safety and security. Even this plan
2 could be shared with redactions applied to specific sections.

3 **24. *Pre-Transport Information.*** Releasing information about transport
4 details of incarcerated individuals can lead to serious consequences, as seen in
5 the 2024 escape from Idaho Department of Corrections. Details like timing,
6 route, and destination should be kept undisclosed before transport to prevent
7 assisted escape. These details become known once transport occurs, as the
8 incarcerated individual knows their route, and they may share it. Routine
9 transparency or disclosure increases risk, especially when transporting high-
10 profile inmates who might face external threats. I support keeping all pre-
11 transport information confidential to mitigate these risks, though some
12 situations, like physician availability or court appearances, may make routine
13 procedures unavoidable. Post-transport information does not pose the same
14 risk. External threats are particularly relevant when transporting notorious
15 inmates, due to potential vigilante attacks. Having performed many transports,
16 I understand the risks involved in providing security for individuals facing
17 high-profile cases.

18 **25. *Other Unique Documents.*** Based on my experience, other unique
19 documents, such as those related to key control and key replacement, may need
20 to be kept confidential. These documents could aid in an escape attempt and
21 should be kept confidential.

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1 **III. Information Commonly Marked Confidential in Litigation,**
2 **Including In This Case**

3 26. Based on my experience as a correctional expert who has reviewed
4 thousands of documents produced in litigation, there are general categories of
5 documents commonly marked confidential for “safety and security” reasons.
6 In my opinion, disclosure of many of these documents would not actually
7 jeopardize safety and security. Each topical area should be reviewed through
8 the lens of the three questions I posed previously. I believe the analysis should
9 also include a more granular level of detail. Does the entire document meet
10 this level of confidentiality, or can only parts of the document be redacted?
11 Often, I see entire documents concealed, including the document’s name, and
12 I struggle with the logic of this approach

13 27. It is my understanding that in this case, the defendant has argued that
14 disclosing video footage, a “use of force packet,” and activity logs from a
15 specific dorm would harm the detention center’s ability to maintain safety and
16 security. While I have not reviewed the individual documents or videos, I
17 cannot say whether that is true. My opinion is that, as a general matter, videos,
18 use of force policies and reports, and activity/movement logs rarely contain
19 information that would jeopardize safety and security if disclosed.

20 28. *Video/Images.* There are generally two kinds of video footage (and
21 related still images). The first is footage from stationary cameras positioned
22 throughout the facility. The second is footage from body-worn or handheld
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1 cameras. Both are commonly treated as confidential, but in my opinion,
2 disclosure would rarely jeopardize safety and security.

3 29.A common concern about footage from a stationary camera is that it
4 may reveal the camera's location or living and work area layouts. However,
5 incarcerated people know where the cameras are because they can see them.
6 As a part of daily life, incarcerated persons are able to observe, and even
7 document their surroundings. Above and beyond this, there is a significant
8 amount of photographs already available online, which show living units,
9 corridors, recreational space etc.
10 (See: <https://www.gettyimages.com/photos/adelanto-detention-center>). So
11 disclosing the footage would not reveal any information they do not already
12 know.

13 30.A second concern is that footage can reveal blind spots in the
14 surveillance system. This is also an unconvincing concern. If a correctional
15 agency discovers a blind spot, it should remedy it immediately so that when
16 any video is made public, the blind spot no longer exists.

17 31.A third concern for both stationery and body-worn cameras is that the
18 footage will reveal specific tactics used to maintain control. I find this concern
19 lacking because if the video in question is a use-of-force incident that occurred
20 in a living unit, it was more than likely witnessed by several incarcerated
21 individuals assigned to that unit. In the field of corrections, it is no secret that
22 emergency responses comes in phases because it is the tactic everyone uses.
23 In addition, there are a significant number of prison use-of-force videos on the
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1 internet that demonstrate the tactics most correctional agencies use, e.g.
2 <https://youtu.be/XvacBXLgkWI?si=HdP6qGh8nQhmL5fe>. Countless times
3 in a correctional institutions incarcerated individuals observe waves of staff
4 responding to incidents, but many times in my career I have heard from post-
5 incident interviews with incarcerated people about how they were still
6 surprised by how many staff showed up.

7 32.As an expert witness, I have provided opinions in approximately 40
8 cases involving city, county, and state confinement facilities. The majority of
9 these cases involved use-of-force or in-custody deaths. In all these cases, from
10 a wide variety of jurisdictions, video evidence was provided where available,
11 often with faces blurred to protect identities. In fewer cases, the video evidence
12 was provided under a protective order. If a legitimate “safety and security”
13 concern exists, why would so many other jurisdictions provide the same type
14 of material? The one caveat I have is that if videos show areas of the facility
15 that are not accessible to incarcerated people or visitors, then there may be
16 some argument to keep what is hidden, confidential. Even in the rare instance
17 where this may be applicable, those portions of videos can be addressed
18 through the courts limiting their distribution to attorneys’ eyes only.

19 33.A growing number of correctional and law enforcement agencies are
20 adopting officer-worn body cameras. The rationale is straightforward: when
21 officers perform their jobs appropriately and follow laws and policies, the
22 video evidence collected can and does exonerate them from false allegations.

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1 Admittedly, the blade cuts both ways, and in some instances it reveals gross
2 negligence or abuse.

3 34. From a correctional administrative perspective, many, if not all,
4 corrections administrators I have spoken with who have implemented body
5 cameras praise them and report a reduction in use-of-force incidents.

6 35. Based on the facts I have described, in my opinion, there is no legitimate
7 penological need or a genuine safety and security justification for preventing
8 the release of video evidence from fixed, handheld, or body-worn cameras.

9 **36. *Use of Force Policies and Reports.*** In general, individual facility
10 policies mirror an agency-wide policy that sets standards that must be met at
11 the facility level. These policies describe standards (outcomes) and may
12 include processes if they are relevant to mitigating risk or required under a
13 statute, but they are generally written broadly about how a particular policy
14 expectation will be carried out. In smaller municipal or county detention
15 facilities, the policy tends to be one and the same. Based on my knowledge of
16 the large volume of policies maintained by WADOC and numerous other
17 agencies, and the policies I have reviewed during my expert work, I have found
18 that policies rarely describe actual tactics that, if revealed, would jeopardize
19 safety and security.

20 37. For example, a transportation policy may require transportation officers
21 to alter their route when transporting individuals to commonly used
22 destinations. An argument could be made that the policy contains detailed
23 tactics for how transports are carried out, and that if revealed, this information
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1 could jeopardize someone’s safety. This is an example where logic plays a
2 vital role because the commonsense statement about altering routes does not
3 increase risk or create a safety concern for anyone involved; the policy itself
4 does not disclose any details about *actual* routes.

5 38.As an additional example, consider a governing policy for the Special
6 Emergency Response Team (SERT) or the Hostage Rescue Team (HRT).
7 These policies will spell out the purpose or intent of the policy and then set
8 requirements such as:

- 9 • The selection process for membership would include physical
10 standards to be met, psychological testing to be completed, and
11 the like.
- 12 • Authorized weaponry—like a sidearm (pistol), longarm (rifle),
13 and a myriad of less lethal force options available to corrections
14 and law enforcement today (e.g., Pepper spray, Taser, 40mm
15 Sponge Round, etc.).
- 16 • Other authorized equipment—Uniforms, helmets, breaching
17 tools, etc.
- 18 • Team structure—Team Leader, Assistant Team Leader, Squad
19 leaders, breachers, designated marksmen (snipers), etc.
- 20 • (Rarely, if at all) Communications practices, including
21 frequencies used and storage location of weaponry. NOTE: All
22 of this information regarding facility-specific tactical details, if
23 included, should be redacted. See paragraph 23.

24 39.One could argue that disclosing these governing policies could
compromise safety and security: “our most elite tactical unit will be
compromised, and people could die as a result.” This is not even close to being
true. One could search Google to see what commonly used S.W.A.T.
equipment is or what the requirements are to be on a S.W.A.T. team. Only the

1 tactics used by these teams could, if revealed, compromise safety and security.
2 The tactics used to resolve a situation are defined at the time of the incident by
3 the officer's training, the environment, and the crisis to be resolved, not the
4 policy. Depending on the agency, the policy may include information such as
5 radio frequencies, storage locations, and other minutiae that should be
6 redacted, but it is not necessary to exclude the entire policy.

7 40. Policies related to emergency response bodies, such as the policy I
8 described above, are among the most sensitive and, some might argue, should
9 be confidential. However, in my opinion, they do not need to be. If these
10 policies contain specific information as I described like radio frequencies, call
11 signs or weapons storage locations, this specific information can be redacted.

12 41. As previously mentioned, policies related to use of force have been
13 thought of as some of the most “confidential” policies in corrections. This
14 thinking has largely changed in the correctional field, and it is not unusual for
15 correctional facilities to make their use-of-force policies available to the
16 public. Again, these general policies rarely discuss facility-specific tactical
17 details.

18 42. In this case, as the Court already noted, the use-of-force policy at
19 Adelanto must comply with the Department of Homeland Security’s
20 Performance-Based National Detention Standards, which are available to the
21 public. See <https://www.ice.gov/doclib/detention-standards/2025/nds2025.pdf>. Any Adelanto-specific policy is unlikely to
22 significantly deviate from this publicly accessible policy.
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1 43.PBNDS 2.8 (“Use of Force and Restraints”) requires documentation of
2 use of force incidents and an “After-Action Review.” Based on my knowledge
3 of similar documentation and reporting requirements in the correctional field,
4 it is my opinion that these kinds of documents can be disclosed and routinely
5 are in all other jurisdictions I have worked with. Again, these documents may
6 ultimately reveal misconduct, but that does not mean that the information, if
7 disclosed, would jeopardize the safety and security of a facility.

8 **44. *Internal Movement and Activity Records.*** Routine records of internal
9 daily movements or activities, such as sick call, medical appointments, visits,
10 segregation rounds, and unit logs, document information after-the-fact and
11 pose no safety or security threat if disclosed. These records are a necessary
12 and routine part of correctional recordkeeping.

13 45. After reviewing some of the dorm logs that have been submitted in this
14 case (Docket No. 60-4), it is my opinion that these kinds of logs document
15 information that, if disclosed, would not jeopardize the facility’s safety and
16 security. These documents primarily memorialize the unit’s daily activities,
17 which all incarcerated people can and do observe. Occasionally, an officer may
18 make a notation about a specific inmate and suspect activities, so the next shift
19 is aware and can keep a closer eye on the situation. None of this information
20 if known would cause a “safety & Security” concern.

21 46. In my experience reviewing countless critical incidents that resulted in
22 adverse outcomes, such as excessive or unnecessary use of force, suicide,
23 escape, and even homicide, the single most valuable piece of information is
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1 the video from before and after the incident, along with the unit logs. These
2 can be reconciled to determine whether the actions recorded in the log are
3 consistent with what is viewable in the video. If an officer logs that they
4 conducted a tier or safety check as required by policy, it is recorded in the unit
5 log.

6 47. In my experience, this is a common area of failure, because staff “Pencil
7 Whip” the task. This is a commonly used expression used to describe when an
8 officer logs that they performed their safety checks or other required activities
9 when they did not. Unfortunately, incidents of pencil-whipping safety checks
10 are very common in post-incident investigations. For the staff person who
11 engages in the activity, it is grounds for discipline.

12 48. ***Information Relating to Staffing.*** It is my understanding that GEO has
13 argued that the dorm logs and videos “provide an insight as to how GEO staffs
14 its facilities.” I struggle to think of what “safety & Security” concern this could
15 relate to. Remember that incarcerated individuals can observe staff 24-7, and
16 they do. All correctional staff are taught this in their basic academy.
17 Incarcerated individuals already know the routines of assigned staff, so what
18 is wrong with the general public learning the activities of federal contractors?

19 49. To the extent GEO is concerned that information could reveal that it
20 had, or has, a staffing shortage, I can’t even imagine how this information
21 would jeopardize safety and security. The incarcerated population already
22 knows there is a problem because they experience it firsthand. After all,
23 programs and activities are shut down due to staffing shortages, and staff work
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1 multiple shifts as a matter of routine. It is impossible to keep this information
2 secret. As I previously stated, if the incarcerated population knows it, it should
3 be synonymous with the public knowing it because communication goes both
4 ways.

5 50.It should be no secret that correctional agencies nationwide are
6 struggling to staff their facilities post-COVID-19 and, for many jurisdictions,
7 for years before the pandemic. This fact is occasionally reported in the media.
8 From my experience, recruiting and retaining staff, including correctional and
9 medical staff, has been an ongoing challenge for most correctional agencies.

10 51.Before I was Secretary of WADOC, I was the Director of Prisons, and
11 one of our challenges was recruitment and retention. To address this, I had
12 reports developed that were reviewed routinely to track the vacancy rate at any
13 given facility. When a facility was experiencing or about to experience staffing
14 shortages, I could direct agency resources and strategies to help the facility. It
15 was an essential part of my role.

16 52.Certain staffing information may compromise safety and security in a
17 narrow area. If the area or facility is facing extreme staffing challenges, it may
18 make the difficult decision to close critical security posts related to perimeter
19 security and other vital internal control points. In this instance, which posts are
20 vacant and when they are vacant should not be shared. These would be “yes”
21 answers to my guiding questions 2 and 3. Again, this is a narrow subset of
22 information related to a specific situation. If documents about staffing contain
23 this information, it can be redacted. In my opinion, outside this narrow subset
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1 of information related to key security posts, the only risk of disclosing staffing
2 information is possible embarrassment in the public eye for failing to staff your
3 facilities fully. Even this is doubtful given the labor shortages most
4 organizations are facing.

5 **IV. Conclusion**

6 53. Based on my experience in corrections, many documents and records
7 are created daily, and most are routinely available to the public. I have
8 provided examples of the narrow subset of documents that should be kept
9 confidential to ensure the safety and security of our correctional institutions,
10 but that subset is extremely limited. I have also explained why I think the types
11 of materials that have been sealed in this case are unlikely to harm the safety
12 and security of Adelanto if disclosed.

13 54. I acknowledge that it is easier to determine what should and shouldn't
14 be made public when one has spent as many years as I have in the field of
15 corrections. The courts face a daunting task in making these decisions. I
16 assume it is difficult to know the harm that can be caused to plaintiffs and
17 defendants alike by withholding information that could influence the outcome
18 of litigation. But as explained in this declaration, it is my opinion that only a
19 minimal number of documents maintained by correctional agencies could, if
20 revealed to the public, threaten the safety and security of a correctional
21 institution.

22 I certify that, to the best of my knowledge and belief:

23 i. The statements of fact in this report are true and correct.

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Attachment A

STEPHEN SINCLAIR

Justice & Liberty Group, LLC

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Executive Summary

Over 30 years of progressive experience in adult male and female corrections from serving as a Correctional Officer to being appointed Secretary of the Washington State Department of Corrections by Gov. Jay Inslee in 2017. Accountable for over 19,000 supervised individuals and over 17,000 incarcerated individuals within 12 correctional facilities and 12 work release facilities.

Experience with all levels in corrections settings within a state correctional system including maximum custody (restrictive housing), work release, reentry, and community corrections. Specialty areas include restrictive housing reform, violence reduction, use of force, programming, gender-responsive/trauma-informed services, correctional culture change, roster management/staffing and emergency response.

Developed and co-directed the highly successful Sustainable Practices Lab (SPL) at the Washington State Penitentiary, resulting in thousands of incarcerated individuals receiving training and work experience in conservation, horticulture, aquaculture, carpentry, and many other fields. The program has produced hundreds of thousands of pounds of produce for the facility and local residents needing food. Additionally, SPL has significantly reduced landfill waste through repairs and recycling of goods and materials including reclamation of over 30,000 board feet of wood.

Co-directed the [Sustainability in Prisons Project](#). Which is a unique partnership between WADOC and the Evergreen State College. Through this program we brought environmental sustainability practices, science and nature into our corrections facilities to enrich the lives of the incarcerated population. Today some of these programs are credit bearing, allowing incarcerated individuals to receive college credits for their participation and a foundation for re-entry.

I delicately and successfully navigated and developed years-long productive relationships with numerous diverse stakeholders, including the state legislature, victim advocates, Columbia Legal Services, Disability Rights Washington, NAACP, Teamsters Local 117, and the Washington Federation of State Employees.

Recipient of the 2020 Tom Clements Award for Innovation by the Correctional Leaders Association and recognized by Governor Christine Gregoire in 2009 For Excellence in Management.

In 2021, after retiring from 32 years with the Washington State Department of Corrections, I started the Justice & Liberty Group, LLC (JALG). As an expert, I have produced several reports for clients and participated in depositions as well as provided trial testimony. In January of 2022, JALG was retained

by the Kansas Department for Aging and Disability Services to conduct an extensive security review and cultural assessment of the Larned State Hospital, following two recent elopements of patients. This review included analysis staffing, supervision, & span of control.

My experience as an expert witness has been informative and educational because it has given me the opportunity to conduct forensic reviews of situations that have not gone well. This is a unique opportunity because, late in my career in corrections, I was rarely able to delve into and do my analysis of the incidents that went wrong in the agency. Doing this work now has informed my opinions a great deal and helps me see the common but sometimes unique failures that result in negative outcomes for correctional agencies and facilities.

My work as an expert has also enabled me to view countless policies and practices of jails and correctional agencies nationwide. I understand the commonalities of correctional work and the risks these organizations take when they are not responsive to an evolving world.

Knowledge, Skills, and Abilities

Culture Change

Expert understanding of the value of creating a balance between security practices and incarcerated individual programs to create a safe and humane correctional environment for the incarcerated and the staff who work there. Significant experience through multiple levels of leadership in leading employees through change to enhance correctional culture, improve practices, and deliver better outcomes.

Systems Change

Demonstrated ability to analyze complex situations to find systemic changes that enhance correctional environments, increasing the defensibility of practice and reducing tort liability. Specialized expertise in creating agency policy to address emerging issues based on case law and being proactive to increase humanity in the correctional system.

Stakeholder Engagement and Policy Development

Extensive experience working with elected and non-elected members of the legislature and other stakeholder groups, including victim advocates and families of incarcerated individuals, to find policy solutions to complex social problems and build strategic efforts to move these initiatives forward. Significant experience testifying at hearings and developing relationships with key elected officials with influence over the agency and its budget.

Guided many challenging and adversarial meetings to successful resolutions, including collective bargaining agreements, agency policy, and public policy. Key stakeholders included Columbia Legal Services, Disability Rights Washington, NAACP, Teamsters Local 117, and the Washington Federation of State Employees.

Labor Relations

Skilled negotiator working with labor unions or special interest groups with a demonstrated ability to find solutions and achieve mutually beneficial outcomes. Led effort to create new Collective Bargaining Agreement (CBA) language to change an age-old practice impacting bid rights for staff assigned to restrictive housing. In subsequent CBA negotiations with the Teamsters Local 117, they successfully negotiated, for the first time, interest arbitration in a state contract with WADOC.

Crisis Management

Skilled crisis manager, having successfully led various facilities and groups through numerous crises in a complex authorizing environment. Implemented incident command structure to quickly establish a highly organized response to acute and ongoing crises, including 16 months of agency leadership during the COVID-19 pandemic.

Leadership Development

Extensive experience mentoring and developing leaders to be successful in their organizations. Significant role in redefining leadership teams to build trust amongst members and establish shared operating norms for teams.

Innovation

As a Correctional Investigator and later Correctional Sergeant, I created a unique escape response team called the Inmate Recovery Team (IRT). The team is based on three principles: Command and control, Community Involvement, and man-tracking skills. Working as an investigator and an active member of the Washington State Penitentiary's Special Emergency Response Team, I researched escapes from the Penitentiary over the previous ten years. I learned that most escapees remained in the immediate area for 72 hours after escaping the secure perimeter. Logic at the time was that once someone escaped, they caught a ride and were no longer in the community. My research proved this wasn't true and that inmate recovery was possible with a coordinated escape response by specially trained staff. After a few escape responses and recoveries, the IRT concept was adopted statewide as the accepted method of escape response. The training academy I developed for this specialized team has since been used to train hundreds of WADOC staff and numerous city, county, state, and federal law enforcement officers.

This spirit of innovation remained with me for my entire career, resulting in numerous initiatives that became practice.

Accomplishments

Secretary – WADOC Headquarters 2017-2021

- Led agency transformation to strengthen alignment between the strategic goal to reduce recidivism and agency operations by establishing a separate division responsible for successful reentry.
- Developed a successful new strategic approach to funding the agency budget, resulting in the largest budget increase in the agency's history.
- Successfully competed for and was selected by the Vera Institute restrictive housing reform initiative "*Safe Prisons, Safe Communities: From Isolation to Dignity and Wellness Behind Bars*"
- Led delegation to Norway to engage in knowledge sharing and immersive learning experience about their world-renowned approach to corrections.
- Established a foundation for significant culture change through extensive work with AMEND and the Norwegian correctional system to adapt best practices to the Washington corrections system as part of a broader effort to shift the agency's culture.

- Successfully led and navigated numerous political dynamics to pass legislation to improve correctional outcomes (see legislative successes)
- Transformed executive management team from dysfunctional to highly cohesive and trusting, eliminated silos, and increased collaboration. Before this transformation the team was evaluated and determined to be exceptionally dysfunctional based on the "*The Five Dysfunctions of a Team*" assessment. The post-evaluation using the same tool showed a significantly improved culture. Post assessment by the [Coraggio Group](#) showed these improvements - Trust +93%, Conflict +53%, Commitment +68%, Accountability+50%, Results +72%
- Coalesced agency staff from the bottom up to change the agency mission statement and values to reflect the importance of delivering humane and people-centered corrections work.
- Ensured integration of agency values in daily work by changing the employee evaluation process to prioritize adherence to and demonstrating agency values as primary expectations.
- Drove implementation of the agency's first-ever Dynamic Risk tool to assess incarcerated individuals' risk to re-offend.
- Successfully developed and implemented the first WADOC Transgender, Intersex, and/or Gender Non-conforming Housing and Supervision policy.

Prisons Director - WADOC Headquarters 2014-2017

- Implemented agency policy that eliminated punishment for self-harm by individuals with mental illness. Reduced length of segregation time for offenders in crisis and improved conditions of confinement.
- Effectively managed the division budget by ending the fiscal year under budget.
- Designed and implemented an outcomes-based management system for the Prisons Division that focuses on results through performance metrics and quarterly performance reviews.
- Created a headquarters outcome-based management system for statewide program managers to clarify roles and responsibilities and better align efforts to agency outcomes.
- Implemented incentives to decrease energy use and carbon production in prison facilities.
- Partnered with colleagues to change the internal audit process to monitor individual facility corrective action plans in the areas of Safety, Operations Inspections, Emergency Management, and Critical Incident Reviews. Facility operations became more efficient, agency policy compliance increased, and agency risk was reduced.
- Partnered with Chief Financial Officer to create a facility fiscal management system to better manage the division's budget. The use of this system has created a common language and process. This has resulted in increased performance and better-trained emerging leaders with the skills necessary to manage with limited resources effectively.
- Facilitated the launch of bee-keeping programs at all 12 correctional facilities following a successful partnership with the Sustainability in Prisons Project to co-host a statewide Bee Summit to promote an expansion of beekeeping within the correctional system.
- Served as agency lead for Teamsters Collective Bargaining Agreement for the 2017-2019 biennium.

Deputy Director Prisons - WADOC HQ 2011-2012

- As Deputy Director partnered with the [Vera Institute](#) to evaluate the use of max custody in WADOC. This resulted in changes in practice that significantly reduced the use of max custody beds and operating costs.
- Initiated partnership with Disability Rights Washington to better serve offenders with disabilities who are housed in specialized units and max custody. The effectiveness of this relationship has prevented potential litigation and improved our service to individuals with disabilities.
- Agency lead for Teamster 117 Collective bargaining
- Initiated significant changes to the agency's Restrictive Housing policy resulting in a 40% reduction of time spent in Restrictive Housing pending administrative action.

Superintendent – Washington State Penitentiary 2008-2014

- Reduced violence by applying several strategies, including the Prisons [Cease Fire Model \(intervention of gang violence\)](#), Earned Incentive Program, Creation of Sustainable Practices Lab (Job Creation), and Max Custody Congregate Programming. Maintained a 30% violence reduction at the Washington State Penitentiary. (<https://results.wa.gov/archived-decrease-rate-violent-infractions-prison>)
- Created the [Sustainable Practices Lab](#) to reduce idleness and give incarcerated individuals the to contribute to our communities and local non-profits. Currently employs over 120 people.
- Partnered with facility Business Advisors to create a fiscal management system that increased ownership and accountability for facility budgets. Reduced facility expenditures by \$1,000,000 in the first year in food service and plant maintenance.
- One of the first states in the nation to create congregate programming in maximum custody so those with the greatest need could be afforded opportunities for change. Significantly reduced rate of return to max custody. Engaged staff in shifting culture to reduce violence against staff and the need for uses of force.
- Partnered with Washington State University to start a [Monarch butterfly](#) rearing program in a specialized living unit to improve the diminishing Monarch population.
- Instituted an Earned Incentive Program (incentive-based level system) to expand incentives for well-behaving individuals. This system allowed individuals who demonstrated good behavior to have expanded access to recreational activities, fundraising events, and other incentives.
- Re-started facility gardening program to decrease food costs and provide more fresh vegetables for the facility population. Reduced food costs and harvested over 175,000 pounds of fresh produce, which went to the facility kitchens and local non-profit organizations.

Associate Superintendent - Callam Bay Corrections Center & Washington State Penitentiary 2004-2008

- Led an effort to establish assigned seating in the dining hall that eliminated large-scale fights and significantly reduced one-on-one altercations.
- Worked with office clerical staff to develop violence trends and data collection systems which was instrumental in violence reduction efforts.
- Created a workgroup of managers, supervisors, and officers focused on reducing facility violence through data analysis.
- Created a work group to review current practices in population management of the facility segregation unit.

- One of only two agency staff selected to participate in the Executive Excellence Program presented by the University of Washington.

Captain – Clallam Bay Corrections Center

- Worked with Roster Manager to create overtime trend analysis to manage overtime spending better. Significantly reduced overtime expenditures.
- Created a local Emergency Response Committee to develop a group of subject matter experts to participate in local and statewide audits.
- Led a group of managers and supervisors through a successful audit that resulted in exceptional marks for the facility's security practices.
- Developed a partnership with regional law enforcement agencies to share resources in various mutual aid events.
- Selected to represent the department in contract negotiations for legislated civil service reform in 2005.
- Designed & implemented facility movement control system (system modeled by other facilities).
- Implemented roster management procedures that dramatically reduced employee grievances related to roster management.
- Received Governor's recognition for facilitating a process improvement team to streamline correctional officer hiring procedures. Greatly increased number of qualified correctional officer applicants which reduced overtime related to vacancies by 150%.
- Facility recognition for exceptional practices - developed, planned and led Correctional Lieutenants in process to prepare facility for departmental security management audits
- Implemented and coordinated Inmate Recovery Team (escape response team) at Clallam Bay Corrections Center and with sister facility.
- Coordinated participation of facility emergency response teams in regional border and narcotics enforcement effort involving local, state and federal law enforcement agencies.
- Planned and coordinated numerous facility wide searches.
- Developed facility violence trend analysis system to better determine where to deploy appropriate resources for targeted results. Reduced facility violence by over 50%.
- Acted as leader of the Security Management group for the development of the CBCC Strategic Plan.

Additional Positions Held

| | |
|---|--------------------|
| Shift Lieutenant Washington State Penitentiary | 1997 - 2000 |
| Correctional Sergeant Washington State Penitentiary | 1995 - 1999 |
| Correctional Investigator Washington State Penitentiary | 1992 - 1995 |
| Correctional Officer Washington State Penitentiary | 1988 - 1992 |

Special Assignments

| | |
|---|-------------|
| Special Emergency Response Team Washington State Penitentiary Squad Leader | 1989 - 2000 |
| Inmate Recovery Team Washington State Penitentiary Team Leader Department Coordinator | 1995 - 2000 |
| United States Army Honorably Discharged | 1984 - 1988 |

Groups/Organizations

| | |
|---|----------------|
| Washington Criminal Sentencing Taskforce (Legislative Body) Member | 2020 - 2021 |
| Washington Criminal Justice Training Academy Commissioner | 2017 - 2021 |
| Washington Sentencing Guidelines Commission Member | 2017 -2021 |
| Sustainability in Prisons Project Co-Director | 2016 - 2021 |
| Correctional Leaders Association Program and Training Committee, Chair Restrictive Housing Committee, Member | 2017 - Present |
| Correctional Peace Officer Foundation Member | 2017 -2021 |
| American Correctional Association Member | 2014 - Present |
| Walla Walla Valley Early Learning Coalition Member | 2008 - 2011 |
| Walla Walla Chamber of Commerce Member | 2008 - 2014 |
| Walla Walla Executive Alliance Member | 2008 - 2014 |

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|--|--------------------|
| Inmate Recovery Team Academy Lead Instructor; Agency Coordinator | 2001 - 2008 |
| Boy Scouts of America Scout Master | 2003 - 2004 |
| Statewide Emergency Response Committee Lead Instructor; Agency Coordinator | 2000 - 2005 |
| Departmental Emergency Response Auditor Lead Instructor; Agency Coordinator | 2000 - 2008 |
| Departmental Security Management Auditor Lead Instructor; Agency Coordinator | 2003 - 2008 |

Education/Training

| | |
|---|----------------------------------|
| Master of Public Administration (MPA) The University of Washington, Daniel J. Evans School of Public Affairs | 2007 Graduate |
| Cascade School of Executive Excellence Dan Evans School of Public Affairs, University of Washington | 2006 |
| Law Enforcement Officer, Reserve Washington State Criminal Justice and Training Commission Reserve Law Enforcement Academy | March 1997 – October 1997 |
| Washington State Patrol Investigator Washington State Patrol Academy | September 1992 |
| Correctional Officers Academy Washington State Criminal Justice and Training Commission | December 1988 |
| Emergency Medical Technician Pikes Peak Community College Colorado Spring, CO | 1987 - 1988 |

Other Training/Certifications

| | |
|---|---------------|
| • Mid-Management | November 2000 |
| • First Level Supervision | March 1996 |
| • Tracking Operations for Technical Teams | April 1994 |
| • Drug Investigator | April 1993 |
| • Audio Intelligence Devices (Montana CJTC) | May 1993 |
| • Advanced SWAT | April 1991 |
| • SWAT Basic | October 1989 |
| • Emergency Response Instructor | April 1998 |

- Universal Tracking September 1997
- Firearms Instructor Update April 1997
- H&K MP5 Operator January 1997
- Modified Tactical Team November 1996
- Firearms Instructor June 1996
- Electronic Restraint Devices January 1996
- Polaroid Photography for Law Enforcement October 1995
- Tactical Tracking Instructor September 1995
- Instructor Development September 1995
- The Reid Tech. of Interview & Interrogation May 1995
- Washington State Patrol ACCESS/WACIC 1992 - 1998
- Inmate Tele-monitoring Operations January 1993
- Explosive Entry Techniques January 1991

Case Work

1. **Deposition & Testimony** - Darold R.J Stenson v. Eldon Vail, et al. No. 08-2-02080-8 (March 2009)
(Prevailed in the trial)

NOTE: All of the following work has been accomplished since May 2021.

2. Report, **Deposition & Testimony** – December 14, 2021, Vincent Keith Bell v. Yvette Williams, Michele Fisher, City and County of San Francisco et al., Case No.: 3:18-cv-01245-SI, U.S. District Court, Northern District of California, San Francisco Division. (Prevailed at trial)

3. Report & **Deposition** - Jack Emmitt Williams v. Lawrence, et al., Case No. 3:19-cv-01369-CRB (PR), U.S. District Court, Northern District of California, San Francisco Division. (Settled)

4. Report & **Deposition** – Maurice L. Wallace, #R-10764 v. John Baldwin, et al., Case No. 17-cv-00576-DWD, U.S. District Court, Southern District of Illinois. (On-going)

5. Report – Odelvin Jacinto Martinez as Administrator of the Estate of Ferdy Isais Jacinto Martinez v. County of Rockland et.al., Case # 21-cv-1276, U.S. District Court Southern District of New York (Settled)

6. Report & **Testimony** - Dewayne Earl Bartholomew - Pierce County Superior Court No. 1 Case #. 81-1-00579-1 (Positive Result)

7. Report & **Deposition** – John Rapp (for Nicholas Winton Rapp) vs. NaphCare, Inc., et al., case # 3:21-cv-05800. Galanda Broadman, PLLC (On-going)

8. Reports (3) & Deposition (3) - Sidley Austin, LLP (All cases on-going) (Some cases information pending expert disclosure)

- Report, **Deposition & Testimony** - Wonder Williams vs. Anthony J. Annucci et al., Case No. 9:20-cv-0147-(BKS-TWD)(Prevailed at the trial)

- Report & **Deposition** – Troy Hendrix vs Anthony J. Annucci, et al, Case No. 9:20-cv-743 (GTS/TWD)

- Report & **Deposition** – Lee Woods vs Anthony J. Annucci, et al, Case No. 9:20-cv-570 (BKS/CFH)

- Report – Shondell Paul vs Anthony J. Annucci, et al., Case No. 9:21-cv-000476 (BKS) (TWD)

- Report – Kayson Pearson vs Anthony J. Annucci, et al., Case No. 9:20-cv-1175

9. Retained – Makyyla Holland vs Broome County; David E. Harder et al Case No 22-CV-00297-DNH-CFH, United States District Court for the Northern District of New York, Paul, Weiss, Rifkind, Wharton & Garrison LLP (Settled)

10. **Testimony** – State of Oregon vs James Samuel Defrank - Malheur County 9th Judicial District of Oregon Case #11094090C (Not Guilty)

11. Report – Kristi Goldstein vs City of Philadelphia case No. 2:21-CV-01433, United States District Court for the Eastern District of Pennsylvania, Pennsylvania Institutional Law Project (Settled)

12. Report – Gonzalez vs TDCJ Case no. DCCV21-2825-87, District Court of Anderson County, Texas & Gonzalez vs Lumpkin et al. Case No. 6:21-cv-351, United States District Court for the Eastern District of Texas. Edwards Law, Austin, Texas (On-going)

13. Retained – Oregon Public Defense Services Commission, Office of Public Defense Services resentencing Anthony Scott Garner Case No. 981296 Clatsop County, Oregon (Case resolved)

14. Report – Michael T. Smith, (for Jeana Michelle Rogers) vs NaphCare, Inc., & Kitsap County case No. 3:22-cv-05069-DGE. Galanda Broadman, PLLC (Settled)

15. Report & **Deposition** – Ethan Lofton, by and through Veda Leary as Guardian of Ethan Lofton v. Franklin County Mississippi, Amite County, Mississippi Case No. 5:22-CV-0052-DCB-BWR, The Eichelberger Law Firm, PLLC, Mississippi (Settled)

16. Report – David Derahn, Pierce County Public Defender's Office (On-going)

17. Retained – American Civil Liberties Union (ACLU) National Office (Case Resolved)

18. Report & **Deposition** – Victoria Mannina vs District of Columbia. Case No. 15-cv-931 (ACR), US Dist. Court for the Dist. of Columbia. Bickerman Dispute Resolution, LLC.

19. Declarations – Rosas vs Robert Luna Sheriff of Los Angeles County. Case No. CV-12-00428 DDP (MRW), US Dist. Court Central Dist. Of California, Western Division. Retained by ACLU Foundation of Southern California, ACLU National Prison Project & Paul Hastings LLP.

20. Report –John Doe vs City of New York and New York Health and Hospitals Case No. 20-cv-6393, United States District Court, Southern District of New York Kelner & Kelner. NY, NY (Settled)

21. Report – Estate of Robert Jackson vs City of New York et al. Case No. 22-cv-02208, United States District Court, Southern District of New York. Kelner & Kelner. NY, NY

22. Report – Jones vs Clemons. Case No. 5:20-cv-00372-MHH-JHE, US District Court, Northern District. Southern Poverty Law (Alabama)

23. Retained - Hogan Lovells (Massachusetts) (Case information withheld pending expert disclosure)

24. Report – Chadwick Sweet vs Pendleton Correctional Facility, Case No. 49D06-2009-CT-32867, State of Indiana, Marion Superior Court, County of Marion. Teresa L. Todd, Attorney

25. Retained – Law Offices of David A. Kaufman, APC (Case information withheld pending expert disclosure)

26. Retained – Proskauer Los Angeles, CA (Case information withheld pending expert disclosure)

27. Retained – Whiteford Law, Delaware (Case information withheld pending expert disclosure)

28. **Deposition** – Estate of Robert Munger vs The State of Washington Case No. 22-2-01428-34, Thurston County Superior Court, State of Washington

30. Retained - Oregon Public Defense Services Commission, Office of Public Defense Services (Case information withheld pending expert disclosure)

Consulting

JALG was Commissioned by the Kansas Department for Aging and Disability Services to conduct a Security Review and Cultural Assessment of the Larned State Hospital. January 2022 – April 2022

Member of Steering Committee for The Moss Group, who is working on BJA's Improving Institutional Corrections Training Academy Training, FY 19 Comprehensive Corrections Training and Technical Assistance (BJA Training Scan) project.

Consultant for KHO11 of Houston, TX, for an on-camera opinion on Harris County Jail Use of Force incidents.

Plumas County Jail inspection to provide opinion on ending long-standing consent decree.

Collective Bargaining & Personnel Matters

Washington PERC # 128405-I-16 Arbitrator's R18

FMCS No. 161203-0576-6 DOC# 1082-3096 Arbitrator's R11

Publications

Politico, Opinion | Why Pell Grants Can Help Fight the Pandemic, December 4, 2020
