

DECLARATION OF KENETRA CHAPPELLE

I, Kenetra Chappelle, declare as follows:

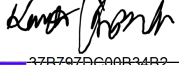
1. I am over 18 years old. I have personal knowledge of the facts set forth in this declaration and, if called to testify, could and would competently testify to them.
2. I am the mother of Kam Isis Davison. Kam has been incarcerated in the Solano County jails since November 5, 2021. She was detained at the Justice Center Downtown Facility (JCDF) in Fairfield, California, until the summer of 2025, when she was transferred to Stanton Correctional Facility, where she remains today.
3. I currently live in Emeryville, California. I am the full-time caregiver for my youngest daughter, who is six years old and has been diagnosed with autism. She requires care all day, every day, including bathing her, feeding her, homeschooling her, and providing her with her medication. Because of my caregiving responsibilities, I am not able to work or earn income outside the home. I am living on a fixed income and my financial situation has been very difficult.
4. Kam was actively involved in my life before being incarcerated. She came around about twice each week to help me straighten up the house, to help me care for her younger sister, or to share a meal with us. Even though Kam was an adult, I was still mothering her. I was always sensing what she needed and reaching out to her. I would send her pictures and prayers. I would feed her when she came by—she especially liked when I cooked gumbo. We have always had a close bond and that has not changed, even though not being able to visit in person makes it harder.
5. When Kam was at JCDF, I was able to go to the jail and see her through a glass pane. Those interactions were difficult. It was painful to see Kam and not be able to touch her. The phones provided for the through-glass conversations barely worked, so we struggled to hear each other. I did not have a car at the time, so I would take an Amtrak train to Fairfield and then an Uber to the jail. It was not an easy trip, but it was worth it. The money I spent on transportation required me to forgo basic necessities, but I was willing to do so to see my daughter in person. Since Kam's transfer to Stanton, we can only make phone or video calls remotely. I have not been able to sit in the same room as my daughter since she was transferred there last summer.
6. I speak with Kam by phone about once each week, sometimes a little more often. I see her on video only occasionally, usually when she is already on a video call with another family member. The quality of the video calls is very bad. The calls are glitchy and sometimes freeze. The camera angle is always off; I can rarely see Kam's full face. I have never scheduled a video call with Kam. The rate of video calls — which has shifted between \$5.70 and \$9 per call — is more than I can afford.
7. In March 2025, I was diagnosed with lupus. It causes me a lot of physical pain, fatigue, and sleeplessness, and has given rise to anxiety and depression. I have avoided telling Kam about my diagnosis. I want to share this news with her during a contact visit. When

I tell her, I want to be able to hold her, console her, and reassure her that I am okay. It's now been over a year that I've been carrying this news without sharing it with my daughter. I recognize that, because of my participation in this lawsuit, I may not be able to wait until I can hug my daughter before sharing my diagnosis with her. Although that thought distresses me, I feel it's worth it if my participation might prevent other people from experiencing the same pain of separation.

8. My youngest daughter, who is six years old, is extremely close to Kam. Kam helped me care for her throughout her infancy and has always been protective of her. When Kam was at JCDF, I would bring my youngest to see Kam through the glass. Those interactions were very hard for my youngest. She would get very upset that she could see Kam but not touch her or hug her. We went, because being close to Kam mattered. Since Kam was moved to Stanton, we cannot even see her through glass, and my youngest daughter has lost the only way she had of being in the same room as her sister.
9. The video-only policy has also made it very challenging for Kam to stay in touch with her two grandmothers. The technology is very difficult for both of them to operate. One of them could not even figure out how to establish an account. They would be better able to stay connected to Kam if they could visit her in person.
10. On April 1, 2026, Kam's father died suddenly. Our family has leaned on each other to grieve. Kam has not been able to. Without in-person visits, she cannot sit with her father's mother, who is also grieving the loss of her son. The two of them cannot hold each other or comfort each other. Kam is grieving her father essentially alone.
11. Video and phone cannot give me what I need with my daughter. I cannot put my hand on her face. I cannot hug her. She cannot look into my eyes the way she could if we were in the same room. There are things a mother and her daughter need to share in person, about how we are each really doing, that we cannot say on a call we know is being monitored and recorded. The lack of contact visits has put a strain on my relationship with Kam. Being physically present with her would let me show her that I am here. It would let her feel that, no matter what she is going through, she is still loved.
12. If the Solano County jails allowed family contact visits, I would visit Kam every week. I would bring her younger sister to see her, and I would help her grandmothers see her too.
13. It would mean the world to be able to hug my daughter again. It would give me a chance to show her that her family is still here for her, especially now that she is grieving the loss of her father.
14. I understand that this case seeks to restore in-person family visits at the Solano County jails. I want to be a plaintiff in this case. I have talked with my lawyers about what it means to be involved in a class action lawsuit, including that the case may take years to resolve and that I may be asked to give a deposition or appear in court. I want to be involved. I want to help the other families who are living through what Kam and I are living through.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 29.00 day of June, 2026, in Emeryville,
California.

Signed by:

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Kenetra Chappelle