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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF SOLANO**

12
13 BaKari Etter, by and through his Guardian ad
Litem, LaKetha Bairfield, Deborah Fernandez
14 Crowder Music, Kenetra Chappelle, Joseph
Duran Jr., individually and on behalf of all others
15 similarly situated,

16 Plaintiffs,

17 v.

18 Solano County, Solano County Sheriff's Office,
19 Solano County Sheriff Brad DeWall, and
iWebVisit.com, LLC,

20 Defendants.

Case No.:

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR PRELIMINARY
INJUNCTION**

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MEMORANDUM OF POINTS AND AUTHORITIES

TABLE OF CONTENTS

NOTICE OF MOTION AND MOTION	I
MEMORANDUM OF POINTS AND AUTHORITIES	II
TABLE OF CONTENTS	II
TABLE OF AUTHORITIES	III
INTRODUCTION	I
BACKGROUND	1
A. County Defendants Contract with Defendant iWebVisit to Ban Contact Visits in Exchange for Money	1
B. Defendants' Family Visit Ban is Causing Irreparable Constitutional Harm	3
1. The Ban Harms Plaintiffs and the Prospective Relief Class	3
2. The Ban Harms Jailed Individuals, Jail Staff, and the Public	4
ARGUMENT	4
I. PLAINTIFFS ARE LIKELY TO PREVAIL ON THE MERITS	5
A. Children and Parents Have Fundamental Rights to Family Relationships Under the California Constitution	5
B. Defendants' Ban on Parent-Child Contact Visits Infringes on Plaintiffs' Fundamental Rights	7
C. Defendants' Ban on Parent-Child Contact Does Not Survive the Scrutiny Demanded by the Due Process and Inalienable Rights Clauses	8
1. Defendants' Ban Fails Heightened Scrutiny Under the Due Process Clause	9
2. Defendants' Ban Fails Heightened Scrutiny Under the Inalienable Rights Clause	11
3. Defendants' Ban Cannot Survive Even a Less Stringent Form of Scrutiny	13
II. THE BALANCE OF THE EQUITIES FAVORS AN INJUNCTION	16
A. Plaintiffs Will Suffer Irreparable Harm if the Injunction is Not Granted	16
B. Defendants Will Not be Harmed by the Injunction	17
CONCLUSION	17

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>Am. Acad. of Pediatrics v. Lungren</i> , 16 Cal. 4th 307 (1997)	11
<i>Amador Valley Joint Union High Sch. Dist. v. State Bd. of Equalization</i> , 22 Cal. 3d 208 (1978)	14
<i>Beard v. Banks</i> , 548 U.S. 521 (2006)	15
<i>Beeman v. Anthem Mgmt, LLC</i> , 58 Cal. 4th 329 (2013)	15
<i>Board of Supervisors v. Local Agency Formation Com.</i> , 3 Cal. 4th 903 (1992)	10
<i>Butt v. California</i> , 4 Cal. 4th 668 (1992)	5, 16
<i>Cooper v. Morin</i> , 49 N.Y.2d 69 (1979)	13
<i>Duarte Nursery, Inc. v. California Grape Rootstock Improvement Com.</i> , 239 Cal. App. 4th 1000 (2015)	9
<i>Easterling v. Thurmer</i> , 880 F.3d 319 (7th Cir. 2018)	15
<i>Hill v. NCAA</i> , 7 Cal. 4th 1 (1994)	8, 11, 12
<i>Hillman v. Britton</i> , 111 Cal. App. 3d 810 (1980)	16
<i>In re Bridget R.</i> , 41 Cal. App. 4th 1483 (1996)	5, 7
<i>In re Brittany S.</i> , 17 Cal. App. 4th 1399 (1993)	8
<i>In re C.P.</i> , 47 Cal. App. 5th 17 (2020)	7

1	<i>In re Carrafa,</i>	
	77 Cal. App. 3d 788 (1978)	9
2	<i>In re French,</i>	
3	106 Cal. App. 3d 74 (1980)	10
4	<i>In re Gallego,</i>	
5	133 Cal. App. 3d 75 (1982)	12
6	<i>In re James R.,</i>	
	153 Cal. App. 4th 413 (2007)	5, 6, 7
7	<i>In re Marilyn H.,</i>	
8	5 Cal. 4th 295 (1993)	5, 7
9	<i>In re Marriage Cases,</i>	
10	43 Cal. 4th 757 (2008)	6
11	<i>In re Marriage of Harris,</i>	
	112 Cal. Rptr. 2d 127 (Ct. App. 2001)	6
12	<i>In re Nicholas H.,</i>	
13	46 P.3d 932 (2002)	17
14	<i>In re Smith,</i>	
15	112 Cal. App. 3d 956 (1980)	1, 15
16	<i>Inmates of Sybil Brand Inst. for Women v. County of Los Angeles,</i>	
	130 Cal. App. 3d 89 (1982)	12
17	<i>Irwin v. City of Hemet,</i>	
18	22 Cal. App. 4th 507 (1994)	6
19	<i>Ketchens v. Reiner,</i>	
20	194 Cal. App. 3d 470 (1987)	16
21	<i>Manning v. Ryan,</i>	
	13 F.4th 705 (8th Cir. 2021)	15
22	<i>Miller v. Carson,</i>	
23	563 F.2d 741 (5th Cir. 1977)	13
24	<i>Ortiz v. L.A. Police Relief Ass'n.,</i>	
25	98 Cal. App. 4th 1288 (2002)	6
26	<i>Overton v. Bazzetta,</i>	
	539 U.S. 126 (2003)	13, 15
27	<i>Payne v. Superior Ct.,</i>	
28	17 Cal. 3d 908 (1976)	9

1	<i>People v. Brisendine,</i>	
	13 Cal. 3d 528 (1975)	14
2	<i>People v. Chavez,</i>	
3	26 Cal. 3d 334 (1980)	14
4	<i>People v. Longwill,</i>	
5	14 Cal. 3d 943 (1975)	14
6	<i>People v. Pettingill,</i>	
	21 Cal. 3d 231 (1978)	14
7	<i>People v. Valencia,</i>	
8	240 Cal. App. 4th Supp. 11 (2015)	10
9	<i>People v. Williams,</i>	
10	17 Cal. 5th 99 (2024)	16
11	<i>Procunier v. Martinez,</i>	
	416 U.S. 396 (1974)	13
12	<i>Public Util. Com'n,</i>	
13	59 Cal. 2d 863 (1963)	14
14	<i>Rhem v. Malcolm,</i>	
15	371 F. Supp 594 (S.D.N.Y)	13
16	<i>Robbins v. Super. Ct.,</i>	
	38 Cal. 3d 199 (1985)	5
17	<i>Ryerse v. Caruso,</i>	
18	No. 1:08-CV-516, 2009 WL 2982756 (W.D. Mich. Sept. 11, 2009)	15
19	<i>Stuard v. Stuard,</i>	
20	244 Cal. App. 4th 768 (2016)	7
21	<i>Susan H. v. Jack S.,</i>	
	30 Cal. App. 4th 1435 (1994)	17
22	<i>Troxel v. Granville,</i>	
23	530 U.S. 57 (2000)	5
24	<i>Turner v. Safley,</i>	
	482 U.S. 78 (1987)	13, 14, 15
25	<i>Tyson v. Tanner, No. 08-CV-4,</i>	
26	445, 2010 WL 2216507 (E.D. La. May 7, 2010)	15
27	<i>Warfield v. Peninsula Golf & Country Club,</i>	
28	10 Cal. 4th 594 (1995)	6

1	<i>White v. Davis,</i>	
	30 Cal. 4th 528 (2003)	16
2	Statutes	
3	Cal. Const. art. I, § 7	8
4	Cal. Const. art. I, § 7(a)	7
5	Cal. Const. art. I, §§ 1, 7	passim
6	Regulations	
7	15 Cal. Code Regs. § 1062(a)(3)	2
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
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1 Detention Facility (“JCDF”), and Stanton Detention Facility (“Stanton”). (Compl. Exs. A–C.)¹ The
2 original Contracts for Stanton and Claybank mandated that those facilities “eliminate all face to
3 face visitation through glass or otherwise and ... utilize video visitation for all non-professional on-
4 site visitors.” (Compl. Exs. A, C.)²

5 Under the Contracts, iWebVisit kicks back a portion of the money it receives for each video
6 call to the Sheriff’s Office. Kickback rates depend on the number of calls the Sheriff’s Office
7 drives through iWebVisit’s platform. The Sheriff’s Office receives 15% of call revenue if the jail
8 maintains an average of 1.5 calls per inmate per month, 20% for an average of 2 calls per inmate
9 per month, and so on, up to 35% of revenue for an average of 3.5 calls per inmate per month.
10 (Compl. Exs. A–C.) To further incentivize County Defendants to deny other forms of human
11 contact and promote video calls, the contracts for JCDF and Claybank allow iWebVisit to
12 terminate the contracts if the average number of video calls per inmate per month falls below 0.75
13 at those facilities. (Compl. Exs. A, B.)

14 The Contracts have been lucrative. Between fiscal year 2020 and 2025, County Defendants
15 made almost half a million dollars from video calls. (Rood Decl. Ex. 1.) Video calls are currently
16 the only way for family members to “visit” their incarcerated loved ones, outside of extremely
17 limited through-glass visits permitted at JCDF. As detailed below, through-glass visits and video
18 calls do not adequately protect the fundamental child-parent relationship and are not adequate
19 substitutes for human contact. *See infra* Section I.B. Video calls are also expensive. They cost
20 between \$5.70 and \$9.00 for a 30-minute video call. Moreover, because video calls can only be
21 made through iWebVisit’s online portal, family members cannot call their loved ones unless they
22 have access to a web-enabled electronic device and possess the digital literacy necessary to
23 schedule a call. (Chappelle Decl. ¶ 9.)

24 ¹ All three contracts are collectively referred to as the “Contracts.” These Contracts were amended
25 in 2017. The amendments eliminated the provisions mandating the restriction and elimination of
contact visits, but by this time, the contact visit ban was already firmly in place.

26 ² JCDF offers two free 30-minute through-glass visits per week. This is mandated by a California
27 regulation that states any jail that offered in-person visitation prior to January 1, 2017 cannot
eliminate it entirely. 15 Cal. Code Regs. § 1062(a)(3). JCDF offers the minimum number of
28 through-glass visits legally allowed by law. Stanton and Claybank did not offer in-person visitation
as of January 1, 2017, and therefore are not subject to this regulation.

1 **B. Defendants’ Family Visit Ban is Causing Irreparable Constitutional Harm**

2 Defendants’ Family Visit Ban irreparably harms Plaintiffs and the Prospective Relief Class,
3 as well as the public and everyone who is detained in or works at the County’s detention facilities.

4 **1. The Ban Harms Plaintiffs and the Prospective Relief Class**

5 Plaintiffs currently have no way of hugging or even touching their children and parents.
6 Fifteen-year-old BaKari Etter’s relationship with his father has changed because they are unable to
7 touch or hug each other; BaKari feels distanced and disconnected from his father. (Etter Decl. ¶ 9.)
8 Defendants have deprived Deborah Fernandez of her relationship with her best friend and primary
9 caregiver, her son, since his pretrial incarceration began in 2024. (Fernandez Decl. ¶ 2–5.) She is
10 only able to speak with him using the extremely limited free video calls³ and, when her very fixed
11 income allows, occasional paid video and phone calls. (*Id.* ¶ 8.) This inability to touch or hug her
12 son—or even to look him in the eyes—fills her with “grief and anxiety.” (*Id.* ¶ 12.) Defendants
13 have prevented Kenetra Chappelle from hugging her daughter since her daughter’s incarceration
14 began in 2021. (Chappelle Decl. ¶ 2.) After having through-glass visits with her daughter at JCDF,
15 which were “painful” because she was not able to touch her daughter, Ms. Chappelle has been
16 unable to even sit in the same room as her daughter since she was transferred to Stanton in summer
17 2025. (*Id.* ¶ 5.) She has not yet told her daughter of her lupus diagnosis because she wants to do so
18 when she can be with her daughter to physically comfort her. (*Id.* ¶ 7.) Joseph Duran Jr. has not had
19 physical contact with his son at any point during his son’s time in jail as a result of the Family Visit
20 Ban. (Duran Jr. Decl. at ¶¶ 2, 10.) He cannot “hold him, hold his hand, sit beside him, or look him
21 in the eye in the same room.” (*Id.* ¶ 12.) This lack of contact visits makes him feel “distant” from
22 his son and brings back feelings similar to when Mr. Duran Jr. himself was incarcerated, making
23 him feel “less confident as a father.” (*Id.* ¶ 17.)

24 Preventing children and parents from having physical contact has profound consequences.
25 Children’s well-being depends on their ability to maintain healthy attachments to their caregivers.
26 (Compl. Ex. E ¶ 22.) Repeated and regular contact—especially physical touch—is essential to
27 those attachments and affects children’s social connections, emotional regulation, and comfort. (*Id.*

28 ³ iWebVisit offers one free remote video call per week for individuals incarcerated in Stanton.
(Fernandez Decl. ¶ 9.)

¶¶ 23–27.) The incarceration of a parent, even for a short time, places immense strain on the parent-child relationship, causing severe, negative consequences that can affect them for the remainder of their lives. (*Id.* ¶ 35; 40–43.) Children whose parents are incarcerated risk negative physical, emotional, and behavioral health outcomes both while their parent is incarcerated and after. (*Id.* ¶¶ 36–37.) Preserving positive parent-child relationships can mitigate the harms of having an incarcerated parent. Similarly, parents of incarcerated individuals are at risk of negative health consequences, including suicidality, PTSD, anxiety, and depression. (*Id.* ¶ 67.) It is therefore vitally important for parents to have contact with their incarcerated children as well. (*Id.* ¶¶ 69–70.) But without the opportunities for face-to-face interaction and positive physical touch, family bonds inevitably weaken, and a parent and child’s health and well-being suffer. (Compl. Ex. E ¶ 66.)

2. The Ban Harms Jailed Individuals, Jail Staff, and the Public

Empirical data show banning contact visits also harms incarcerated people, jail staff, and the public at large. These bans eliminate incarcerated people’s primary source of optimism and make it more difficult to prepare for reentry. Contact visits lower the likelihood of self-harm, including suicide. (Compl. Ex. D ¶ 17.) Banning contact visits also harms staff. Contact visitation reduces conflict between incarcerated individuals and between incarcerated individuals and staff, decreasing the rate of violence in detention facilities. (Compl. Ex. F ¶ 16.) This, in turn, boosts staff morale, improving job satisfaction, staff recruitment, and retention. (*Id.* ¶ 76.)

Banning contact visits undermines community safety. Incarcerated people who receive sustained family contact through visitation are less likely to return to jail or prison after release. (Compl. Ex. D ¶¶ 22–28.; *see also* Compl. Ex. F ¶ 101.) They also enjoy better reentry outcomes. They are more likely to reestablish productive social and familial roles, are more likely to have access to social capital, and are more likely to find employment. (Compl. Ex. D ¶¶ 29–30, 35–36.)

Restrictions on family visits, and especially the total elimination of human contact, harms not only Plaintiffs, but everyone at the jail and the public at large. (Compl. Ex. D ¶ 47.)

ARGUMENT

In granting a preliminary injunction, the Court weighs two “interrelated” factors: “(1) the likelihood that the moving party will ultimately prevail on the merits and (2) the relative interim

1 harm to the parties from issuance or nonissuance of the injunction.” *Butt v. California*, 4 Cal. 4th
2 668, 677–78 (1992). These two factors operate on a sliding scale: “the greater the plaintiff’s
3 showing on one, the less must be shown on the other to support an injunction.” *Id.* The court must
4 exercise its discretion “in favor of the party most likely to be injured.” *Robbins v. Super. Ct.*, 38
5 Cal. 3d 199, 205 (1985) (internal quotation marks and citations omitted).

6 **I. PLAINTIFFS ARE LIKELY TO PREVAIL ON THE MERITS**

7 The California Constitution guarantees a fundamental right to maintain the parent-child
8 relationship. Cal. Const. art. I, §§ 1, 7. Regulations that interfere with this right are subject to
9 heightened scrutiny. Even under a less searching standard, the blanket prohibition on visits is so
10 arbitrary, counterproductive, and harmful that it would fail any applicable standard of review.

11 **A. Children and Parents Have Fundamental Rights to Family Relationships Under
12 the California Constitution**

13 The right to maintain the parent-child relationship is protected by the California
14 Constitution. Infringements on that right are subject to heightened scrutiny.

15 The right of parents to the care, custody, and control of their children is one of the oldest,
16 most fundamental rights recognized under both the state and federal constitutions. *See, e.g., In re*
17 *Marilyn H.*, 5 Cal. 4th 295, 306 (1993) (“A parent’s interest in the companionship, care, custody
18 and management of his children is a compelling one, ranked among the most basic of civil
19 rights.”); *Troxel v. Granville*, 530 U.S. 57 (2000) (“[T]he interest of parents in the care, custody,
20 and control of their children [] is perhaps the oldest of the fundamental liberty interests recognized
21 by this Court.”).

22 “[T]he child’s interest in the parent-child relationship is at least as important and as worthy
23 of protection as the parent’s interest.” *In re James R.*, 153 Cal. App. 4th 413, 438 (2007).
24 “[C]hildren’s interests also include the elementary and wholly practical needs of the small and
25 helpless to be protected from harm and to have stable and permanent homes in which each child’s
26 mind and character can grow, unhampered by uncertainty and fear of what the next day or week or
27 court appearance may bring.” *In re Bridget R.*, 41 Cal. App. 4th 1483, 1503–04 (1996), *as modified*
28 *on denial of reh’g* (Feb. 14, 1996).

1 California courts construe the right to family relationships broadly. *See, e.g., Irwin v. City of*
2 *Hemet*, 22 Cal. App. 4th 507, 517–18 (1994) (parents and children of individual who died in jail
3 adequately alleged deprivation of their right to familial relationships); *In re James R.*, 153 Cal.
4 App. 4th 413, 428–29 (2007) (child has right to visitation with parents, even while incarcerated).

5 This fundamental right is protected by the Inalienable Rights Clause, which states: “All
6 people are by nature free and independent and have inalienable rights. Among these are enjoying
7 and defending life and liberty, acquiring, possessing, and protecting property, and pursuing and
8 obtaining safety, happiness, and privacy.” Cal. Const. art. I, § 1.

9 The right to privacy encompasses several rights, including the right to personal autonomy,
10 privacy of information, intimate association, and expressive association. *See Ortiz v. L.A. Police*
11 *Relief Ass’n.*, 98 Cal. App. 4th 1288, 1302 (2002); *see also In re Marriage Cases*, 43 Cal. 4th 757,
12 814 (2008) (“[O]ne component of our state constitutional right of privacy” is the “right of intimate
13 association.”)

14 The right of intimate association protects family relationships, including those between
15 parent and child, as “an intrinsic element of personal liberty”:

16 [T]he highly personal relationships that are sheltered by this
17 constitutional guaranty [to intimate association] are exemplified by
18 ‘those that attend the creation and sustenance of a family — marriage
19 ..., childbirth ..., the raising and education of children ... and
20 cohabitation with one’s relatives....’ ... ‘Family relationships, by their
21 nature, involve deep attachments and commitments to the necessarily
22 few other individuals with whom one shares not only a special
23 community of thoughts, experiences, and beliefs but also distinctly
24 personal aspects of one’s life.’

25 *In re Marriage Cases*, 43 Cal. 4th at 814 (quoting *Warfield v. Peninsula Golf & Country Club*, 10
26 Cal. 4th 594, 624 (1995)); *see also In re Marriage of Harris*, 112 Cal. Rptr. 2d 127, 139 (Ct. App.
27 2001), *review granted and opinion superseded*, 37 P.3d 379 (Cal. 2002), and *aff’d in part and*
28 *remanded*, 34 Cal. 4th 210, 96 P.3d 141 (2004) (“A parent’s fundamental liberty interest is
protected by the California Constitution, specifically, article I, section 1.”).

1 The Due Process Clause of the California Constitution also protects the parent-child
2 relationship. Cal. Const. art. I, § 7(a); *Stuard v. Stuard*, 244 Cal. App. 4th 768, 782–84 (2016)
3 (describing “fundamental parenting right” as protected liberty interest under federal and state
4 constitution). “A parent’s interest in the companionship, care, custody and management of his
5 children is a compelling one, ranked among the most basic of civil rights. Likewise, natural
6 children have a fundamental independent interest in belonging to a family unit.” *In re Marilyn H.*, 5
7 Cal. 4th 295, at 306 (internal citations omitted); *see also In re James R.*, 153 Cal. App. 4th at 429
8 (analyzing right to family integrity under federal and state due process clause); *In re Bridget R.*, 41
9 Cal. App. 4th at 1503-04 (same); *In re C.P.*, 47 Cal. App. 5th 17, 29 (2020) (due process clause of
10 both federal and state constitution protect against “unreasonable government interference with
11 parental rights”).
12

13 **B. Defendants’ Ban on Parent-Child Contact Visits Infringes on Plaintiffs’**
14 **Fundamental Rights**

15 Banning all parent-child contact interferes with their constitutionally protected relationship.
16 Intimacy depends on physical presence and touch as vital parts of a loving, successful parent-child
17 relationship. Mr. Duran Jr. describes how video calls only serve to remind him of what he is
18 missing: being able to hug his son. (Duran Jr. Decl. ¶ 16.) Ms. Chappelle discusses how hard it has
19 been for her not to be able to tell her daughter about her lupus diagnosis, because she does not want
20 to share this major health news through a screen. (Chappelle Decl. ¶ 7.) Scientific research explains
21 how deep Plaintiffs’ injuries run. Children with incarcerated parents are more likely to become
22 delinquent, to underperform academically, and to have emotional difficulties like depression or
23 aggression, behavioral problems like attention difficulties, and even physical health problems like
24 migraines and high cholesterol. (Compl. Ex. E ¶ 37.) Contact visits help mitigate these and other
25 grave harms. The more children visit their incarcerated parents, the more likely the parent and child
26 will maintain a feeling of closeness after release, which increases the likelihood that the family unit
27 will stay intact and that the parent and child will live together or at least visit more frequently. (*Id.*
28 at ¶ 46.) Children who visit their incarcerated parents, especially through contact visitation, have

1 lower reported rates of depression and fewer behavioral problems compared with those who do not
2 have similar visitation; contact visits similarly mitigate negative health impacts for parents of
3 incarcerated adult children. (*Id.* at ¶ 61, 67, 70; *see also supra* Section B.1.)

4 Video calls, phone calls, letters, and messaging are not substitutes for human contact.
5 Contact visits strengthen parent-child relationships more than these other means of
6 communication—including in-person visits without physical contact—which prevent parents from
7 cradling a newborn or hugging their children and holding their hands. (Danielle Haverkate and
8 Kevin Wright, *The differential effects of prison contact on parent-child relationship quality and*
9 *child behavioral changes*, 5 *Corrections: Policy, Practice, & Research*, 222–44 (2020), available at
10 https://static.prisonpolicy.org/scans/Haverkate_Wright_2020.pdf.) Non-contact alternatives cannot
11 satisfy a child’s elemental need to be held or a parent’s hardwired need to hold their hand. Without
12 in-person contact, family bonds weaken, leading to lasting harm. *See In re Brittany S.*, 17 Cal. App.
13 4th 1399, 1407 (1993) (“limiting contact to letters and telephone calls ... virtually assured the
14 erosion (and termination) of any meaningful relationship between [mother and daughter]”).

15 Nor are video calls an option for many people. Some are too young to set up an account or
16 to engage in a video call, have too little income to pay for calls, live with a disability that makes the
17 calls impracticable or impossible, or lack the necessary internet access or technical know-how. (*See*
18 *Chappelle Decl.* ¶ 9.) Each 30-minute video call scheduled through iWebVisit (aside from the first
19 hour of visits, which are offered at no cost in what amounts to an empty gesture) costs anywhere
20 from \$5.70 to \$9.00. (*Chappelle Decl.* ¶ 6.) One in three families with incarcerated family members
21 report going into debt just to stay in touch with their incarcerated loved one. (*Compl. Ex. F* at ¶
22 120.)

23 **C. Defendants’ Ban on Parent-Child Contact Does Not Survive the Scrutiny**
24 **Demanded by the Due Process and Inalienable Rights Clauses**

25 Defendants’ ban is subject to heightened scrutiny under the Due Process Clause (Cal.
26 Const. art. I, § 7) and to a similar framework under the Privacy Clause (Cal. Const. art. I, § 1). *See*
27 *Hill v. NCAA*, 7 Cal. 4th 1, 34 (1994) (affirming state must demonstrate a compelling interest when
28 invading a vital privacy interest). Although analysis of the particular doctrinal contours of parents’

1 and children's rights to family visits with their incarcerated loved ones is a relatively novel issue
2 under the California Constitution for this Court to decide, what is clear is that this fundamental
3 interest in family contact—which exists in every other context of government intervention into the
4 family—does not disappear simply because someone's parent or child is confined to a local jail cell
5 awaiting trial. Even if Defendant's particular circumstances justify reasonable restrictions on
6 Plaintiffs' fundamental rights, such policies must be grounded in evidence and reasoned decision
7 making, and narrowly drawn to meet the state's compelling interests. The entire fundamental rights
8 inquiry is not rendered off limits just because the government has jailed a person's child or parent,
9 just as the government could not knowingly serve food that made a jailed individual sick or fail to
10 treat common medical problems. Importantly, the heightened scrutiny that must be used to analyze
11 the Family Visit Ban still allows jails to do what is necessary and justified for jail security,
12 requiring only that deprivations of the fundamental right be a close fit with a compelling interest
13 and based on evidence such that they are not greater than what is necessary to run the jail. But a
14 complete, permanent ban on human contact does not meet this standard under any reasonable
15 understanding of the state of the evidence and reasonable alternatives. People in jail also still retain
16 certain fundamental liberty interests, as do their non-jailed loved ones, and significant state
17 interference with those basic interests must be justified, *see, e.g., In re Carraga*, 77 Cal. App. 3d
18 788, 791-92 (1978), especially where the jailed person is a presumed innocent awaiting trial, as is
19 the case with most individuals in Solano County jails.

20 **1. Defendants' Ban Fails Heightened Scrutiny Under the Due**
21 **Process Clause**

22 Children and parents have a fundamental right to maintain family relationships under the
23 Due Process Clause, and a state action that infringes on that relationship triggers heightened
24 scrutiny.

25 Such state action "can be upheld only if necessary to effect an overriding governmental
26 interest," and a "government must show that its interest cannot be satisfied by alternative methods
27 less restrictive of the individual right abridged." *Payne v. Superior Ct.*, 17 Cal. 3d 908, 914 (1976);
28 *Duarte Nursery, Inc. v. California Grape Rootstock Improvement Com.*, 239 Cal. App. 4th 1000,

1 1009 (2015) (if “fundamental right” is being violated, “[e]nhanced scrutiny applies” and
2 infringement must be “narrowly tailored to serve a compelling state interest”).

3 County Defendants’ blanket ban on child-parent contact fails both stages of the inquiry:
4 County Defendants cannot show an overriding or compelling state interest, and any asserted state
5 interest could be satisfied by less restrictive alternatives.

6 County Defendants have no valid interest in preventing children and parents from physical
7 contact with their incarcerated loved ones, or in turning a profit by charging children to speak with
8 their parents by phone or video. While public and institutional security and safety are valid
9 interests, banning all family visits does not further them. Indeed, just the opposite is true: bans on
10 contact visits undermine safety by increasing violence in the jail, undermining staff safety, and
11 making it more likely that people inside the jail will be rearrested for new offenses following their
12 release, starting the cycle over anew. (*See* Compl. Ex. D ¶¶ 26, 47; Compl. Ex. F ¶¶ 49, 71.)
13 California prison regulations, which generally allow contact visitation with up to five visitors at a
14 time, including minors, recognize contact visits as “a means of *increasing safety* [and] maintaining
15 family . . . connections.” 15 C.C.R. § 3170(a) (emphasis added). Courts, too, have recognized the
16 critical role of contact visits in prison. *See, e.g., In re French*, 106 Cal. App. 3d 74, 85 (1980)
17 (“Contact visits are deemed to be a critical part of correctional policy in California.”).

18 A regulation can only survive heightened scrutiny if it is “narrowly tailored” to serve a
19 compelling or overriding governmental interest, which means that it must be “the least restrictive
20 and least harmful means of satisfying the government’s goal.” *People v. Valencia*, 240 Cal. App.
21 4th Supp. 11, 23 (2015); *see also Board of Supervisors v. Local Agency Formation Com.*, 3 Cal.
22 4th 903, 913 (1992) (“When a law impinges on certain fundamental rights [...] the classification
23 [must be] narrowly drawn to achieve the goal by the least restrictive means possible.”).

24 The Family Visit Ban does not meet this standard. Data shows banning contact visits leads
25 to no drop in, and sometimes even an increase in, contraband. (Compl. Ex. F ¶ 88.) Myriad
26 alternative policies do not require ending family visits for everyone indefinitely. For instance,
27 California’s state prisons generally permit contact visitation, with individual exceptions when
28 physical contact would “seriously endanger” safety or security, or temporary restrictions after

1 refusal to follow visitation rules. 15 C.C.R. § 3170(d)(1). County jails and state prisons across the
2 country implement these alternatives every day and are still able to keep the community safe while
3 allowing children and parents to see and touch their incarcerated loved ones. (*See* Compl. Ex. F ¶¶
4 43–58.) So do a number of California juvenile detention facilities. (Compl. Ex. F ¶¶ 38–41.)

5 2. Defendants’ Ban Fails Heightened Scrutiny Under the Inalienable 6 Rights Clause

7 Under the Inalienable Rights Clause, the government must demonstrate a “compelling state
8 interest” when it effectuates an “obvious invasion of an interest fundamental to personal
9 autonomy” such as “the freedom to pursue consensual familial relationships.” *Hill v. Nat’l*
10 *Collegiate Athletic Assn.*, 7 Cal. 4th 1, 34 (1994). Even if the government can establish a
11 compelling state interest, a plaintiff can rebut this by “showing there are feasible and effective
12 alternatives to defendant’s conduct which have a lesser impact on privacy interests.” *Id.* at 40.

13 Here, Defendants’ action clearly impacts children’s and parents’ freedom of association and
14 expression under the state constitution’s right to privacy. (*See generally supra* Section I.A.)

15 Plaintiffs can establish the three elements required to prove this claim, which triggers
16 heightened scrutiny. These elements are “(1) a legally protected privacy interest; (2) a reasonable
17 expectation of privacy in the circumstances; and (3) conduct by defendant constituting a serious
18 invasion of privacy.” *Hill*, 7 Cal. 4th at 39–40, 66. Parents and children have a legally protected
19 privacy interest in their relationships with each other. (*See supra* Section A.1.) In this context,
20 privacy does not merely refer to having contact with family members in private; it also
21 encompasses the ability to conduct these activities without state intrusion or interference. *Hill*, 7
22 Cal 4th at 311. While children and parents may reasonably expect some interference with the
23 parent-child relationship while their loved ones are incarcerated—for instance, designated visiting
24 hours or being observed by jail staff during a visit—they have a reasonable expectation that they
25 will be able to continue to maintain a parent-child relationship. And County Defendants cannot
26 point to a history of infringing the right to maintain family relationships to justify the conclusion
27 that Plaintiffs have no right to privacy in these relationships. *Am. Acad. of Pediatrics v. Lungren*,
28 16 Cal. 4th 307, 339 (1997) (“[I]t plainly would defeat the voters’ fundamental purpose in

1 establishing a *constitutional* right of privacy if a defendant could defeat a constitutional claim
2 simply by maintaining that statutory provisions or past practices that are inconsistent with the
3 constitutionally protected right eliminate any ‘reasonable expectation of privacy’ with regard to the
4 constitutionally protected right.”)⁴

5 In other words, the blanket ban is an “obvious government action impacting freedom of
6 expression and association,” triggering heightened scrutiny. *Id.* at 34. It constitutes a serious and
7 obvious invasion of the fundamental right to intimate association. *Hill* at 34. The challenged policy
8 is an absolute ban on all in-person contact, for as long as a parent or child resides in one of County
9 Defendant’s facilities. Unlike a policy that merely limits or incidentally affects family contact,
10 County Defendants have directly prohibited a basic and essential form of family contact.⁵ Because
11 this ban cannot survive heightened scrutiny, it fails.

14 ⁴ Even were a fundamental interest not at stake, the Family Visit Ban would still fail the balancing
15 test acknowledged by *Hill*, which compares plaintiffs’ privacy interests against countervailing
16 interests. 7 Cal. 4th at 37. Plaintiffs’ interests in maintaining their familial relationships are among
17 the most fundamental in our society. (*See supra* Section I.A.) And, as discussed above (*supra*
18 section I.A.2), Defendants’ interests are actually harmed by the visitation ban.

19 ⁵ Previous cases considering incarcerated individuals’ rights to contact visits are not on point. In
20 *Inmates of Sybil Brand Inst. for Women v. County of Los Angeles*, 130 Cal. App. 3d 89 (1982),
21 plaintiffs brought a challenge to contact visits under the Equal Protection clause, alleging a men’s
22 jail had been ordered by a federal court to have contact visits, but contact visits were still banned in
23 the women’s jail. The appellate court did not opine on the constitutionality of the ban but instead
24 ruled the trial court was the proper place to raise this issue. *Id.* at 112. In *In re Gallego* 133 Cal.
25 App. 3d 75, 85 (1982), an incarcerated mother argued that, “under her peculiar circumstances,” she
26 was particularly entitled to contact visits with her child. The *Gallego* court thus applied a standard
27 for assessing the validity of a jail policy “where no express guarantee of the Constitution is alleged
28 to be breached.” *Id.* at 80. The *Gallego* decision is thus inapplicable here, where Plaintiffs allege
Defendants’ blanket policy violates the constitutional rights of all those with a parent or child in
jail. That case did not analyze the plaintiff’s child’s right of due process and privacy, nor any
fundamental right. Moreover, the case presented key circumstances not present here, including the
lack of an adequate area or staff for in-person visitation, and the necessity for visitors to go into the
“heart of the security area” to have visits. *Id.* at 85. The court noted that future construction and
planned “improvement of the jail facilities” might change the analysis. *Id.* The court therefore
explicitly limited its conclusions to the record before it. *Id.* Here, Plaintiffs have presented a
comprehensive record for why Defendants’ ban violates their constitutional rights, and the *Gallego*
decision is no impediment to the Court finding so here. Even when courts afford policies some
deference, “total abdication of responsibility[] to prison and jail officials” is improper. *Id.* at 81.

1 inmates, and on the allocation of prison resources generally,” and (4) the availability of reasonable
2 and less intrusive alternatives, which “may be evidence that the regulation is not reasonable” and is
3 instead an “exaggerated response.” 482 U.S. at 89–90. This represents a long, slow retreat from due
4 process protections for incarcerated individuals in the federal courts, which has been much
5 criticized both by legal scholars and some of the Justices themselves.

6 California need not, and should not, follow recent federal trends away from protecting the
7 fundamental rights of those whose loved ones are incarcerated. “[T]he California Constitution is,
8 and always has been, a document of independent force.” *People v. Brisendine*, 13 Cal. 3d 528,
9 549–50 (1975). Even where the language of the California Constitution is similar or identical to its
10 federal counterpart, the state provisions may provide more robust protection. *Id.* at 550 (“It is a
11 fiction too long accepted that provisions in state constitutions textually identical to the Bill of
12 Rights were intended to mirror their federal counterpart.”). State constitutional claims “cannot be
13 resolved by a mechanical invocation of current federal precedent” and courts have an “obligation to
14 exercise independent legal judgment in ascertaining the meaning and application of state
15 constitutional provisions.” *People v. Chavez*, 26 Cal. 3d 334, 352 (1980). While decisions of the
16 United States Supreme Court may serve as “persuasive authority,” they are “to be followed by
17 California courts only when they provide no less individual protection than is guaranteed by
18 California law.” *People v. Longwill*, 14 Cal. 3d 943, 951 n.4 (1975). Moreover, courts must
19 interpret the California Constitution to “meet ‘changed conditions and the growing needs of the
20 people.’” *Amador Valley Joint Union High Sch. Dist. v. State Bd. of Equalization*, 22 Cal. 3d 208,
21 245 (1978) (quoting *Los Angeles Met. Trans. Auth. v. Public Util. Com’n*, 59 Cal. 2d 863, 869
22 (1963)). This is true “regardless of the narrower manner in which decisions of the United States
23 Supreme Court may interpret provisions of the federal Constitution.” *People v. Pettingill*, 21 Cal.
24 3d 231, 247–48 (1978). Therefore, California courts cannot abandon heightened scrutiny and
25 default to the federal standard of review of policies infringing upon fundamental rights.

26 But even if this Court were to apply a less searching standard despite the fundamental
27 nature of the rights at stake, the blanket prohibition on parent-child visits is so arbitrary, broad, and
28 counterproductive that it would fail any legal test that balances the relevant interests. Though

1 “[s]ome curtailment” of the right to familial association may be required by the exigencies of the
2 jail or prison context, the Supreme Court has never held or “impl[ied] that any right to intimate
3 association is altogether terminated by incarceration.” *Overton*, 539 U.S. at 131. For instance, the
4 Supreme Court struck down an “almost complete ban on [prisoners’] decision to marry.” *Turner*,
5 482 US at 99. And federal courts have held that “prison officials who permanently or arbitrarily
6 deny an inmate visits with family members” violate the Constitution. *Manning v. Ryan*, 13 F.4th
7 705, 708 (8th Cir. 2021); *see also Easterling v. Thurmer*, 880 F.3d 319, 323 n.6 (7th Cir. 2018);
8 *Tyson v. Tanner*, No. 08-CV-4445, 2010 WL 2216507, at *8–9 (E.D. La. May 7, 2010); *Beard v.*
9 *Banks*, 548 U.S. 521, 535 (2006); *Ryerse v. Caruso*, No. 1:08-CV-516, 2009 WL 2982756, at *8
10 (W.D. Mich. Sept. 11, 2009). Since the Supreme Court decided *Turner*, and since the Court’s
11 remarks about intimate family in *Bazzetta*, no federal appellate court has upheld a total ban on
12 family visits at a prison, let alone at a jail where people are detained *pretrial*. And no federal court
13 has *ever* upheld *any* visitation policy enforced to generate profit, as the record demonstrates here.

14 Here, the blanket ban cannot be justified by any legitimate penological goal. The many
15 other institutions that maintain security while promoting parent-child contact also show that there is
16 no “plausible reason[]” for the contact visitation ban. *See Beeman v. Anthem Mgmt, LLC*, 58 Cal.
17 4th 329, 364 (2013) (internal quotation mark omitted). At least one California Court of Appeal has
18 struck down a similar ban on child visitation because it was “an excessive response” to security
19 concerns and therefore not reasonably related to a legitimate government objective. *In re Smith*,
20 112 Cal. App. 3d at 969. The court there noted that its “task is all the more exacting when the
21 restriction is justified on the grounds of institutional security because almost *any* condition or
22 restriction could be condoned by jailers for that legitimate goal.” *Id.* at 968. Here, there is no
23 evidence that County Defendants banned contact visits based on security concerns, especially
24 where the evidence shows that contact visits are not a significant source of contraband entering
25 facilities (Compl. Ex. F ¶¶ 90–92), and bans on contact visitation actually undermine penological
26 interests such as jail security and rehabilitation. (Section C.2, *infra*.) Rather, County Defendants
27 banned contact visits to increase revenue from video calls through contracts with iWebVisit. The
28 Court should not ignore “the realities of the subject matter,” or allow the County Defendants to

1 justify their ban with an “invented fictitious purpose” when their real goal is profit. *People v.*
2 *Williams*, 17 Cal. 5th 99, 125 (2024). For these reasons, Plaintiffs are likely to succeed on the
3 merits of their claim no matter what standard of review applies.

4 **II. THE BALANCE OF THE EQUITIES FAVORS AN INJUNCTION**

5 In addition to the likelihood of success on the merits, courts also evaluate “the relative
6 interim harm to the parties from issuance or nonissuance of the injunction.” *Butt v. State of*
7 *California*, 4 Cal.4th 668, 678 (1992). “The ultimate goal of any test to be used in deciding whether
8 a preliminary injunction should issue is to minimize the harm which an erroneous interim decision
9 may cause.” *White v. Davis*, 30 Cal. 4th 528, 554 (2003) (emphasis omitted).

10 Here, Plaintiffs and the putative class will continue to suffer irreparable harm each day
11 without an injunction: because they will continue to suffer an ongoing violation of their
12 constitutional rights, along with the attendant economic and psychological harms. Moreover,
13 evidence shows that the type of visitation ban perpetuated by Defendants actually *harms* jails and
14 the community at large. Thus, the balance of the equities favors an injunction.

15 **A. Plaintiffs Will Suffer Irreparable Harm if the Injunction is Not Granted**

16 Every day that passes is one in which Plaintiffs cannot touch, hug, or hold their parents or
17 children. This ongoing violation of Plaintiffs’ fundamental right to maintain family relationships
18 continues to cause them irreparable harm. *See, e.g., Hillman v. Britton*, 111 Cal. App. 3d 810, 826
19 (1980) (finding substantial likelihood ordinance violated due process and “[i]n light of the
20 constitutional rights repressed it is clear that appellants will suffer irreparable harm if the injunction
21 does not issue”); *Ketchens v. Reiner*, 194 Cal. App. 3d 470, 480 (1987) (regulation was vague and
22 overbroad; question of interim harm was “not a close one” because “[t]he loss of First Amendment
23 freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury”).

24 Plaintiffs also suffer emotional and psychological harms with lifelong repercussions. (*See*
25 *supra* Section C.1.) Plaintiffs describe the toll that this separation takes on them and their
26 relationships. (Fernandez Decl. ¶ 11; Duran Jr. Decl. ¶ 17; Chappelle Decl. ¶ 11.; Etter Decl. ¶ 9.)
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28

1 **B. Defendants Will Not be Harmed by the Injunction**

2 Preliminary injunctive relief would not meaningfully harm County Defendants. The evidence
3 establishes that allowing contact visits reduces misconduct in the jails, reduces rearrest rates for those
4 released from jail, and improves staff morale and retention. (Compl. Ex. D ¶¶ 18—36; Compl. Ex. F
5 ¶¶ 59—82.) Enjoining County Defendants’ Family Visit Ban would increase the safety and security
6 of the jails, lower recidivism, and ultimately save money. Indeed, the injunction would bring County
7 Defendants into compliance with standards set by the American Correctional Association, American
8 Bar Association, and industry practice, all of which encourage in-person contact visitation for
9 incarcerated individuals. (Compl. Ex. F ¶¶ 24—58.) And because an injunction would benefit
10 children and parents throughout the community, *see supra* Section II.A, it would also promote the
11 state’s and Defendants’ interests in preserving family units and protecting the wellbeing of children.
12 *See, e.g., In re Nicholas H.*, 46 P.3d 932, 938 (2002), as modified (July 17, 2002) (quoting *Susan H.*
13 *v. Jack S.*, 30 Cal. App. 4th 1435, 1442 (1994)) (“The state has an ‘interest in preserving and
14 protecting the developed parent-child . . . relationships which give young children social and
15 emotional strength and stability.’”).
16 Because Plaintiffs and the Class members are harmed each day that an injunction does not issue,
17 while the issuance of an injunction would not meaningfully harm County Defendants, the balance of
18 equities weighs in favor of granting the injunction.

19 **CONCLUSION**

20 For the foregoing reasons, Plaintiffs respectfully request the Court enjoin County Defendants
21 from enforcing their Family Visit Ban during the pendency of this litigation.

22 Dated: July 22, 2026

BRAUNHAGEY & BORDEN LLP

24 By: /s/Matthew Borden
Matthew Borden

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SOLANO

13 BaKari Etter, by and through his Guardian ad
14 Litem, LaKetha Bairfield, Deborah Fernandez
15 Crowder Music, Kenetra Chappelle, Joseph
16 Duran Jr., individually and on behalf of all
17 others similarly situated,

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Plaintiffs,

v.

Solano County, Solano County Sheriff's Office,
Solano County Sheriff Brad DeWall, and
iWebVisit.com, LLC,

Defendants.

Case No.

**DECLARATION OF JOSEPH
DURAN JR.**

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DECLARATION OF JOSEPH DURAN JR.

I, Joseph Duran Jr., 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 father of Joseph Duran III; I call him Joe. Joe was born on August 22, 1988, and is now 37 years old. He has been incarcerated in the Solano County jails since August 26, 2022. He is currently detained at Stanton Correctional Facility in Fairfield, California.
3. I currently live in San Bruno, California. I am 60 years old. I am a laborer in a construction union.
4. When Joe was small, he was always at my side. I never sent him to daycare. The one time I tried, he cried and ran back to me, and I could not bear it. I took him with me everywhere. I ran a company at the time and brought him with me to work. When I worked on cars, he wanted to know every step. He was inquisitive, and he wanted to learn everything I knew.
5. In 1993, when Joe was four years old, I was detained in the California state prison system. I served twenty-four years before being released in 2015. During that time, I was detained at several facilities, including Pelican Bay, Mule Creek, Corcoran, Folsom, San Quentin, and Solano State Prison.
6. Because I lived through twenty-four years of incarceration myself, I know what physical contact with family means to an incarcerated person, and I know what its absence does to a family.
7. During my time at Pelican Bay, I had three overnight visits with Joe. His mother brought him to see me. Those visits strengthened our bond immensely; I especially enjoyed watching movies with him and cooking for him during those visits. After the third visit, the facility changed its policy, and I no longer had access to overnight family visits. It felt like the prison had erected a new wall between my son and me.
8. At Mule Creek, I had one contact visit with Joe. At Folsom, I had several contact visits — my parents brought all three of my children there, including Joe. Those visits, where I could hold my son in my arms, helped me maintain my bond with Joe.
9. At Corcoran, I was permitted to see Joe only once, and it was through a glass pane. He was about nine or ten years old. My parents brought him. He sat across the glass from me, and we tried to talk through the phone. It was so heartbreaking that I almost lost it. Joe started crying as soon as he saw me and I couldn't hold him to console him. Having to see my young son and not be able to touch him was excruciating. It was awful to be in the same room as my child, but to still be cut off from him.

10. The last time I held my son was during a contact visit at Solano State Prison in or around 2003. He was about fifteen years old. Joe is now thirty-seven. I have not been able to have physical contact with him in more than twenty years.
11. Joe and I have not been free at the same time since he was a small child. By the time I was released from prison in 2015, Joe was already incarcerated. Because I was on parole, I was not eligible to visit Joe while he was in state prison. I would drive his mother to the prison so she could visit him, but I would have to wait in the car.
12. Now that he is at Stanton Correctional Facility, the only way I can see my son is by iWebVisit video call. I cannot hold him, hold his hand, sit beside him, or look him in the eye in the same room. The closest I can get to my son is on a screen.
13. Joe and I do video calls every weekend. I have paid iWebVisit for more video calls than I can remember. We also talk on the phone multiple times during the week. We talk about how he is doing inside, his progress, and what is going on with the rest of the family. He often tells me he is proud of how far I have come since my own incarceration. I try to share my life with him through the screen. When I traveled to Memphis, I took Joe through Graceland over video. I try to show him the world when I can—we call it “virtual sightseeing.”
14. These video calls are expensive; I have paid a lot of money to iWebVisit to schedule video calls with Joe. These calls do not replace contact visits. They are limited, insufficient, incomplete, and frustrating. There are things a father wants to do that you cannot do over a screen. I cannot put my hand on his shoulder. I cannot hug him. I cannot sit next to him in silence. When the video call ends, I feel a deep sense of loss that I cannot be with him in person. I have learned, from my own years inside, that physical touch is essential to maintaining love, care, and human connection. Without it, people lose their connection.
15. In my life, I have experienced almost every kind of communication a family can have with someone in custody — overnight visits, contact visits, through-glass, and video calls. Relying on anything other than contact visits really takes something away from the relationship. Through-glass is heartbreaking. Video is even further removed.
16. I have lost two of my other sons. Knowing what it means to lose a child has made me even more aware of how much physical contact with the children I have left matters. Every weekend that I am only able to see Joe through a screen, I am reminded that I have not been able to put my arms around him in more than twenty years.
17. The lack of contact visits has affected me as a father and as a person. When I was incarcerated, the absence of physical contact with my children made me feel less confident as a father. I felt a distance and inadequacy that I could not close from a phone or a letter. I am living that feeling again now, on the other side of the wall, watching my son go through what I went through — and with even less access to contact visits than I had when I was in prison.

18. If Stanton allowed family contact visits, I would visit Joe as often as the facility allowed. I would drive from where I live to Stanton without question. I would do it even for just a single hug.

19. I understand that this case seeks to restore family contact 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 a plaintiff in a class action — including that my name and Joe's name may become public, that I may have to testify, and that the case may receive media attention. I want to do this anyway. I want other families to be able to hold their loved ones at Stanton. I have lived this twice now — once as a father inside, and now as a father on the outside. I do not want any other parent or child to have to live it.

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

Executed this 16 day of June, 2026, in San Bruno, California.

Signed by:

Joseph Duran Jr.

70950AB9F61C400...

Joseph Duran Jr.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SOLANO

Case No.

**DECLARATION OF KENETRA
CHAPPELLE**

BaKari Etter, by and through his Guardian ad
Litem, LaKetha Bairfield, Deborah Fernandez
Crowder Music, Kenetra Chappelle, Joseph
Duran Jr., individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

Solano County, Solano County Sheriff's Office,
Solano County Sheriff Brad DeWall, and
iWebVisit.com, LLC,

Defendants.

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DECLARATION OF KENETRA CHAPPELLE

I, Kenetra Chappelle, declare as follows:

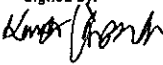
1. I am over 18 years old. I have personal knowledge of the facts set forth in this declaration and, if called to testify, could and would competently testify to them.
2. I am the mother of Kam Isis Davison. Kam has been incarcerated in the Solano County jails since November 5, 2021. She was detained 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:

37B797DC0003402...

Kenetra Chappelle

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[ADDITIONAL COUNSEL

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9 *Attorneys for Plaintiffs*

10

SUPERIOR COURT OF THE STATE OF CALIFORNIA

11

COUNTY OF SOLANO

12

13

BaKari Etter, by and through his Guardian ad
Litem, LaKetha Bairfield, Deborah Fernandez
Crowder Music, Kenetra Chappelle, Joseph
Duran Jr., individually and on behalf of all
others similarly situated,

16

Plaintiffs,

17

v.

18

19

Solano County, Solano County Sheriff's Office,
Solano County Sheriff Brad DeWall, and
iWebVisit.com, LLC,

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Defendants.

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23

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Case No.

**DECLARATION OF DEBORAH
FERNANDEZ CROWDER MUSIC**

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DECLARATION OF DEBORAH FERNANDEZ CROWDER MUSIC

I, Deborah Fernandez Crowder Music, 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 currently live in Vallejo, California. I am 70 years old. I have serious health conditions, including emphysema, chronic obstructive pulmonary disease, asthma, and high blood pressure. I rely on a nebulizer every four hours to breathe. I sometimes rely on a wheelchair for mobility. Because of my health, I am not able to work, and I live on a fixed income.
3. I am the mother of Fenton Warren. Fenton is 49 years old. He is my firstborn son. He has been incarcerated in the Solano County jails since August 21, 2024. He is currently detained at Stanton Correctional Facility in Fairfield, California.
4. Throughout most of Fenton's childhood, he lived with me and I took care of him. Fenton has Tourette syndrome, and he needed more attention than most kids. As a result, we were inseparable for much of his youth. Starting when he was seven, however, I was separated from him on three occasions while I served three separate terms of incarceration. Each time I was arrested, I spent some time at Claybank Detention Facility before being transferred to state prison. This was back in the 1980s and at that time, I was permitted to have contact visits with Fenton while I was detained at Claybank. The visits lasted an hour. Fenton could sit on my lap and give me hugs. I was able to give Fenton things I had purchased at commissary, like candy bars. I was also able to gift him things I'd made for him, like hats, gloves, and scarves I'd crocheted while in jail. Fenton would also bring gifts for me, like drawings he had made. Those visits always brought us closer. They helped me get through a very difficult period and they made it clear to Fenton that I had not forgotten him.
5. In addition to being my son, Fenton is also my best friend. Before he was incarcerated, we lived together and he was my primary caregiver. He helped me with the things I

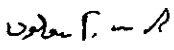
cannot do on my own. When I needed a wheelchair, Fenton was the one who went out and got it for me. He is the only reliable family member I have.

6. Fenton has several tattoos dedicated to me. One says, "Mama's Boy." Another is a portrait of my face. He got these tattoos because of how close we are.
7. Fenton recently received a 14-year sentence. His final sentencing hearing is scheduled for July 17, 2026. After that hearing, I understand that he will likely be transferred to state prison in Delano, California.
8. Because Stanton Correctional Facility does not allow in-person family visits, I have not been able to hug Fenton, hold his hand, or sit in the same room as him (other than at court proceedings) since he was transferred to Stanton. The only way I can see my son is through iWebVisit video calls.
9. Each week, Fenton uses his one free iWebVisit video call to talk with me. When I can afford it, I pay for an additional video call, but I often cannot afford it. Every dollar I spend on iWebVisit is a dollar I am not spending on food, on hygiene supplies, or on doing my laundry. I regularly have to choose between seeing my son and meeting my own basic needs.
10. The video calls are not a real substitute for being in the same room as my son. The picture is often either glitchy or blurry. It freezes in the middle of a sentence, and I find myself talking to a still image of Fenton's face on a screen. The calls also drop often. I do not feel like we are spending meaningful time together.
11. Even when the video calls work properly, I cannot speak freely with my son. I am aware that the iWebVisit calls are closely monitored and recorded. I have heard the click on the line that tells me someone is listening. Knowing that the calls are monitored changes what I am comfortable saying to Fenton, and what I believe he is willing to say to me. There are things a mother and her son should be able to share with each other in private — about how we are each really doing — but we cannot say those things when we know someone else is on the line.

12. Even when the calls work, they cannot give me what I need with my son. I cannot put my hand on his face. I cannot hug him. He cannot look into my eyes and see how much I miss him. I am heartbroken that I cannot visit my son in person. Not being able to hug him or look him in the eye fills me with a grief and anxiety I carry with me every single day. There are mornings I wake up and it is the first thing on my mind, and it makes it hard to get up and face the day. At my age, and with my health, I do not have much energy to spare; so much of the energy I have is being spent on this pain and sadness.
13. Because of my age and my health, I do not know how much time I have left. Fenton's sentence is 14 years. He is likely to be transferred to a prison in Delano, California. I am not sure whether I will have the health or the means to travel to visit him. His time at Stanton may be the last chance to visit him in person, yet the facility's policy is preventing me from doing so. I am afraid that I will never again get to hug my son as his mother.
14. If the Solano County jails allowed family contact visits, I would go at any time of day and on any day of the week. I have a car, and I would drive there no matter what. Nothing would keep me away. I would be there as often as the jail would let me.
15. It would mean everything to me to be able to hug my son again, even one more time. It would mean showing him that we still have each other.
16. I understand that this case seeks to bring family contact visits back to the Solano County jails. I want to be a plaintiff in this case. I talked to my lawyers about what it means to be involved in a class action lawsuit. I want to help the other families who are living through what Fenton and I are living through. Even if this case only helps them, I want to do that. I live the pain every day. I do not want anyone else to have to.

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

Executed this 23.00 day of June, 2026, in Martinez, California.

Signed by:

721CEAFF29304C4...

Deborah Fernandez Crowder Music

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[ADDITIONAL COUNSEL

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9 *Attorneys for Plaintiffs*

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

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COUNTY OF SOLANO

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BaKari Etter, by and through his Guardian ad
Litem, LaKetha Bairfield, Deborah Fernandez
Crowder Music, Kenetra Chappelle, Joseph
Duran Jr., individually and on behalf of all
others similarly situated,

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Plaintiffs,

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v.

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Solano County, Solano County Sheriff's Office,
Solano County Sheriff Brad DeWall, and
iWebVisit.com, LLC,

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Defendants.

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Case No.

DECLARATION OF BAKARI ETTER

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DECLARATION OF BAKARI JACOBY ETTER

I, BaKari Jacoby Etter, declare as follows:

1. I am 15 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 live with my grandma in Vallejo, California, where I attend high school. I am about to start 10th grade. I have two older sisters, Auvionce and Cierra. They both have the same mom and dad as me.
3. My dad is Jacoby Etter. He has been in jail at Stanton Correctional Facility in Solano County for nearly two years.
4. I have always had a connection with my dad. Before he was in jail, I saw him at least once or twice a month. I knew him well. I was so grateful to have a dad and to tell people about him. I always treasured my time with him. When we were together, I would always learn something new. I could tell he cared about who I was becoming. He'd come to my sports games and it would mean so much to me.
5. There's one memory of my dad that is especially important to me. It was around 2020, when I was about six or seven. My dad and I were at a park, and I wanted him to buy me something: a Voltron action figure. He said, "no" and I had a really bad reaction. I yelled at him and called him names. But instead of reacting back, my dad used it as a teaching moment. He talked to me about how to keep my cool, and he gave me advice about how to make something of myself. In the end, he got me the thing I had asked for, and he gave me some cash too. He told me to do something creative with it. That is the kind of thing my dad would do to teach me how to be a better man. That is the kind of interaction I feel I can't really have with my dad anymore since we can't see each other in person.
6. My dad always had a special way of teaching me things. Sometimes he would give me life advice in the form of a riddle, and I loved unpacking the wisdom hidden inside. Right before he went to jail, my dad told me one of these riddles. I'm still trying to figure out

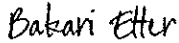
what that riddle means. I would love to be able to go into the jail and talk it through with him in person.

7. Since my dad has been in jail, we mostly stay in touch by talking on the phone. It's nice to talk to my dad, but it's not the same as being together in the same room. Plus, the phone calls cut off in the middle of conversation sometimes. And there are people listening in on the calls. I don't feel like I can say everything I want to say to my dad on those phone calls.
8. My older sisters use iWebVisit to have video calls with my dad. Sometimes I join in their calls, but not too often. I do not really get much out of the video calls. If I can't see my dad in person, I don't really see the point of a video call.
9. Ever since my dad went to jail, I haven't been able to hug him, touch him, or be in the same room as him. I feel our relationship changing. I notice myself feeling less connected to him. I can tell that I'm distancing myself from him even though I don't want to; I notice myself cutting our calls shorter, losing interest in our conversations, and giving shorter responses. Some days are extra hard, like my birthday and Father's Day. On those days, I feel especially sad that the jail won't let me see him.
10. If the Solano County jail permitted contact visits, I would definitely go visit my dad in person. I want to see him with my own eyes. I want to give him a hug. I want to have a conversation that is just between him and me, without someone listening on the line. I'd try to see him as much as possible. There are some conversations that are better to have in person and I want desperately to have those conversations with my dad again. I'd want to talk to him about my love life, my friendships, my school life and my life outside of school. And I'd want him to see how much I've grown physically.
11. I know that seeing my dad in person would be really emotional. I don't think I could keep my composure. But I'd visit him anyways because it's so important. I don't take it for granted that I have a dad. I have many friends who don't have dads, either because their dads died or were never around to begin with. I feel lucky that I have a dad and that he wants to be involved in my life. So, even if it were emotional to visit, it would still be a big priority for me.

12. I understand that this case is about restoring contact visits at the Solano County jails so that kids like me can see our parents. I have talked with my lawyer about what it means to be involved in a class action lawsuit. I want to be involved in the case so that other kids and families do not have to go through what my family and I are going through.

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

Executed this 15 day of July, 2026, in Vallejo,
California.

Signed by:

6E8FE90E209342D...

BaKari Etter

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8 [ADDITIONAL COUNSEL
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9 *Attorneys for Plaintiffs*

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **COUNTY OF SOLANO**

13 BaKari Etter, by and through his Guardian ad
14 Litem, LaKetha Bairfield, Deborah Fernandez
Crowder Music, Kenetra Chappelle, Joseph
15 Duran Jr., individually and on behalf of all
others similarly situated,

16 Plaintiffs,

17 v.

18
19 Solano County, Solano County Sheriff's Office,
Solano County Sheriff Brad DeWall, and
20 iWebVisit.com, LLC,

21 Defendants.

Case No.

**DECLARATION OF HADLEY ROOD IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

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1 I, Hadley Rood, declare:

2 1. I am licensed to practice before this Court and am counsel of record for Plaintiffs. I
3 make this declaration based on personal knowledge. If called as a witness, I could and would testify
4 competently to the facts stated herein.

5 2. Attached as **Exhibit 1** is a true and correct copy of revenue sheets from the Solano
6 County Inmate Welfare Fund ("IWF") from fiscal years 2020-2025.

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

9
10 Dated: July 22, 2026

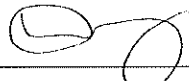
By: 
Hadley Rood

EXHIBIT 1

INMATE WELFARE FUND
STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCE
FOR THE PERIOD ENDING JUNE 30, 2021

	<u>Prior Year</u> <u>Actual</u>	<u>FY2020-21</u> <u>Budget</u>	<u>FY2020-21</u> <u>Actuals</u>	<u>% Actual to</u> <u>Budget</u>
Revenues:				
9230 Marriage Licenses	\$ 207	\$ 488	2,196	450%
9401 Interest Income	38,909	48,000	17,779	37%
9406 Commissary Sales	466,520	351,000	610,230	174%
9407 Telephone Commissions	-	-	-	0%
9412 Video Visitation	63,370	36,000	189,258	526%
9703 Other Revenue (Bail Ads)	45,570	30,000	43,662	146%
Total Revenues	\$ 614,576	\$ 465,488	\$ 863,125	185%
Expenditures:				
1110 Salary/Wages - Regular	\$ -	\$ -	-	0%
1121 Salary/Wages - Extra Help	62,422	72,800	59,649	82%
1210 Retirement - Employer	13,912	18,400	14,443	78%
1220 FICA - Employer	4,661	5,569	4,452	80%
2015 Inmate Clothing and Supplies	23,977	23,746	13,927	59%
2023 Communication-Voicemail	392	-	-	0%
2025 Cellular Communication Service	-	-	495	0%
2026 Cell Phone Allowance	386	480	336	70%
2030 Food	1,481	-	2,135	0%
2035 Household Expense	1,175	612	986	161%
2120 Maintenance Equipment	240	-	-	0%
2170 Memberships	50	125	300	240%
2180 Books & Subscriptions	15,057	20,000	6,257	31%
2200 Office Expense	1,199	1,296	820	63%
2201 Equipment Under \$1,500	5,623	2,925	693	24%
2203 Computer Components<\$1,500	199	-	-	0%
2205 Postage	6,179	4,000	365	9%
2245 Contracted Service	363,311	571,500	255,318	45%
2250 Other Professional Services	8,851	8,109	6,723	83%
2266 Central Data Processing	14,936	13,547	11,503	85%
2271 Software Rental/Subscription	1,400	-	-	0%
2310 Education & Training	1,112	500	445	89%
2312 Special Departmental Expense	301	15,000	130	1%
2335 Travel Expense	-	1,000	-	0%
2337 Meal/Refreshments	15	-	-	0%
3710 Countywide Admin Overhead	2,690	6,735	6,735	100%
5040 Trans-out-POB's	952	1,140	934	82%
Total Expenditures	\$ 530,521	\$ 767,484	\$ 386,646	50%
Net Increase in Fund Balance			\$ 476,479	

Fund Balance July 1, 2020	\$ 1,964,886
Change in Fund Balance	476,479
Fund Balance June 30, 2021	\$ 2,441,365

INMATE WELFARE FUND
STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCE
FOR THE PERIOD ENDING JUNE 30, 2022

	<u>Prior Year</u> <u>Actual</u>	<u>FY2021-22</u> <u>Budget</u>	<u>FY2021-22</u> <u>Actuals</u>	<u>% Actual to</u> <u>Budget</u>
Revenues:				
9230 Marriage Licenses	\$ 2,196	\$ -	1,864	-
9401 Interest Income	17,779	20,000	8,657	43%
9406 Commissary Sales	610,230	468,000	534,915	130%
9412 Video Visitation	189,258	120,000	162,376	158%
9703 Other Revenue (Bail Ads)	43,662	40,000	44,835	109%
Total Revenues	\$ 863,125	\$ 648,000	\$ 752,647	116%
Expenditures:				
1121 Salary/Wages - Extra Help	59,649	72,800	63,700	88%
1131 Salary/Wages - Overtime	-	-	15	-
1210 Retirement - Employer	14,443	21,083	16,545	78%
1220 FICA - Employer	4,452	5,569	4,758	85%
2015 Inmate Clothing and Supplies	13,927	21,440	25,109	117%
2025 Cellular Communication Service	495	492	(34)	-7%
2026 Cell Phone Allowance	336	-	408	-
2030 Food	2,135	-	-	0%
2035 Household Expense	986	1,040	2,599	250%
2120 Maintenance Equipment	-	-	1,542	-
2122 Fuel & Lubricants	-	-	89	-
2170 Memberships	300	125	-	0%
2180 Books & Subscriptions	6,257	18,500	2,448	13%
2200 Office Expense	820	750	463	62%
2201 Equipment Under \$1,500	693	2,800	7,622	272%
2204 Computer Related Items:<\$500	-	-	113	-
2205 Postage	365	4,000	459	11%
2245 Contracted Service	255,318	561,500	293,168	52%
2250 Other Professional Services	6,723	14,094	2,800	20%
2266 Central Data Processing	11,503	13,210	13,003	98%
2271 Software Rental/Subscription	-	-	519	-
2280 Publications and Legal Notices	-	-	3,278	-
2301 Small Tools & Instruments	-	-	1,663	-
2310 Education & Training	445	13,000	-	0%
2312 Special Departmental Expense	130	51,500	2,011	4%
2335 Travel Expense	-	1,000	-	0%
3710 Countywide Admin Overhead	6,735	10,006	10,006	100%
5040 Trans-out-POB's	934	1,147	1,003	87%
Total Expenditures	\$ 386,646	\$ 814,056	\$ 453,287	47%
Net Increase in Fund Balance			\$ 299,360	
Fund Balance July 1, 2021				\$ 2,441,365
Change in Fund Balance				299,360
Fund Balance June 30, 2022				\$ 2,740,725

INMATE WELFARE FUND
STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCE
FOR THE PERIOD ENDING JUNE 30, 2023

	<u>Prior Year</u> <u>Actual</u>	<u>FY 2022-23</u> <u>Budget</u>	<u>FY 2022-23</u> <u>Actual</u>	<u>% Actual to</u> <u>Budget</u>
Revenues:				
9230 Marriage Licenses	\$ 1,864	\$ -	\$ 3,216	0%
9401 Interest Income	8,657	10,000	64,914	649%
9406 Commissary Sales	534,915	432,000	486,769	113%
9412 Video Visitation	162,376	144,000	128,029	89%
9703 Other Revenue (Bail Ads)	44,835	40,000	75,688	189%
Total Revenues	\$ 752,647	\$ 626,000	\$ 758,616	121%
Expenditures:				
1121 Salary/Wages - Extra Help	63,700	72,800	63,268	87%
1131 Salary/Wages - Overtime	15	-	-	0%
1210 Retirement - Employer	16,545	21,738	17,819	82%
1220 FICA - Employer	4,758	5,569	4,824	87%
2015 Inmate Clothing and Supplies	25,109	32,500	16,659	51%
2025 Cellular Communication Service	(34)	540	-	0%
2026 Cell Phone Allowance	408	-	462	0%
2030 Food	-	-	17	0%
2035 Household Expense	2,599	1,500	726	48%
2120 Maintenance Equipment	1,542	-	570	0%
2121 Maintenance-Special Equipments	-	-	186	0%
2122 Fuel & Lubricants	89	-	93	0%
2140 Maintenance-Bldgs & Improvement	-	-	2,176	0%
2170 Memberships	-	125	300	240%
2180 Books & Subscriptions	2,448	16,000	6,090	38%
2200 Office Expense	463	750	3,094	413%
2201 Equipment Under \$1,500	7,622	6,300	14,386	228%
2202 Controlled AssetsComputer Related	-	-	1,734	0%
2203 Computer Components<\$1,500	113	-	-	0%
2204 Computer Related Items<\$500	-	-	35	0%
2205 Postage	459	4,000	1,793	45%
2206 Controlled AssetsComputer Related	-	-	2,655	0%
2216 Maintenance/Service Contracts	-	-	319	0%
2245 Contracted Service	293,168	760,000	299,557	39%
2250 Other Professional Services	2,800	14,094	7,306	52%
2266 Central Data Processing	13,003	13,431	17,823	133%
2270 Software	-	-	434	0%
2271 Software Rental/Subscription	519	-	530	0%
2280 Publication and Legal Notices	3,278	-	3,901	0%
2301 Small Tools & Instruments	1,663	-	740	0%
2310 Education & Training	-	13,500	44,175	327%
2312 Special Departmental Expense	2,011	78,000	27,300	35%
2335 Travel Expense	-	1,000	1,498	150%
2337 Meals/Refreshments	-	-	443	0%
3710 Countywide Admin Overhead	10,006	-	3,982	0%
4303 Equipment	-	-	14,350	0%
5040 Trans-out-POB's	1,003	1,150	979	85%
Total Expenditures	\$ 453,287	\$ 1,042,997	\$ 560,224	54%
Net Increase in Fund Balance			\$ 198,392	
Fund Balance July 1, 2022			\$ 2,740,725	
Change in Fund Balance			198,392	
Fund Balance June 30, 2023			\$ 2,939,117	

INMATE WELFARE FUND
STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCE
FOR THE PERIOD ENDING JUNE 30, 2024

	<u>Prior Year</u>	<u>Actual</u>	<u>FY 2023-24</u> <u>Budget</u>	<u>FY 2023-24</u> <u>Actuals</u>	<u>% Actual to</u> <u>Budget</u>
Revenues:					
9230 Marriage Licenses	\$	3,216	\$ -	\$ 1,960	0%
9401 Interest Income		64,914	10,000	121,306	18%
9406 Commissary Sales		486,769	360,000	349,413	52%
9412 Video Visitation		128,029	120,000	129,191	19%
9703 Other Revenue (Bail Ads)		75,688	36,000	66,108	10%
Total Revenues	\$	758,616	\$ 526,000	\$ 667,978	100%
Expenditures:					
1121 Salary/Wages - Extra Help		63,268	87,200	78,205	8%
1131 Salary/Wages - Overtime		-	-	240	0%
1210 Retirement - Employer		17,819	24,276	23,790	2%
1220 FICA - Employer		4,824	6,671	6,004	1%
1230 Health Ins-Employer		-	-	11,060	1%
1270 Accrued Leave CTO Payoff		-	-	2,722	0%
2011 Clothing & Personal Supplies		-	-	412	0%
2015 Inmate Clothing and Supplies		16,659	26,000	36,857	4%
2025 Cellular Communication Service		-	720	456	0%
2026 Cell Phone Allowance		462	-	38	0%
2030 Food		17	-	-	0%
2035 Household Expense		726	1,000	120	0%
2120 Maintenance Equipment		570	-	3,826	0%
2121 Maintenance-Special Equipments		186	-	-	0%
2122 Fuel & Lubricants		93	-	-	0%
2140 Maintenance-Bldgs & Improvement		2,176	-	39,952	4%
2170 Memberships		300	125	250	0%
2171 Professional License & Cert		-	-	460	0%
2180 Books & Subscriptions		6,090	14,000	11,769	1%
2200 Office Expense		3,094	1,000	777	0%
2201 Equipment Under \$1,500		14,386	12,300	15,854	2%
2202 Controlled AssetsComputer Related		1,734	-	-	0%
2203 Computer Components<\$1,500		-	-	4,546	0%
2204 Computer Related Items<\$500		35	-	-	0%
2205 Postage		1,793	2,500	898	0%
2206 Controlled AssetsComputer Related		2,655	-	-	0%
2216 Maintenance/Service Contracts		319	-	-	0%
2245 Contracted Service		299,557	684,100	584,896	58%
2250 Other Professional Services		7,306	12,283	6,071	1%
2266 Central Data Processing		17,823	17,227	14,867	1%
2270 Software		434	-	1,660	0%
2271 Software Rental/Subscription		530	-	4,530	0%
2280 Publication and Legal Notices		3,901	-	-	0%
2301 Small Tools & Instruments		740	-	-	0%
2310 Education & Training		44,175	7,500	89,898	9%
2312 Special Departmental Expense		27,300	40,000	15,520	2%
2335 Travel Expense		1,498	1,000	7	0%
2336 Travel Out-of-State		-	-	3,377	0%
2337 Meals/Refreshments		443	-	1,134	0%
2350 County Garage Service ¹		-	-	-	0%
3710 Countywide Admin Overhead		3,982	8,427	8,427	1%
4301 Equipment-Vehicles		-	-	4,500	0%
4303 Equipment		14,350	30,000	34,978	3%
5010 Operating Transfers Out		-	-	265	0%
5040 Trans-out-POB's		979	1,415	-	0%
5052 Trans-out-Fleet		-	10,000	-	0%
Total Expenditures	\$	560,224	\$ 987,744	\$ 1,008,366	100%
Net Increase in Fund Balance				\$ (340,388)	

Fund Balance July 1, 2023	\$ 2,939,117
Change in Fund Balance	\$ (340,388)
Fund Balance June 30, 2024	\$ 2,598,729

¹ \$1,266.96 incorrectly charged to the IMF was removed to properly reflect FY23/24 IMF expenses.

INMATE WELFARE FUND
STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCE
FOR THE PERIOD ENDING JUNE 30, 2025

	<u>Prior Year</u> <u>Actual</u>	<u>FY 2024-25</u> <u>Budget</u>	<u>FY 2024-25</u> <u>Actual</u>	<u>% Actual to</u> <u>Budget</u>
Revenues:				
9230 Marriage Licenses	\$ 1,960	\$ 2,500	\$ 612	0%
9401 Interest Income	121,306	70,982	107,304	151%
9406 Commissary Sales	349,413	325,000	331,058	102%
9412 Video Visitation	129,192	120,000	147,595	123%
9603 Photo/Microfiche Copies	-	-	195	0%
9701 Misc Sales - Taxable	-	-	544	0%
9703 Other Revenue (Bail Ads)	66,108	50,400	40,959	81%
Total Revenues	\$ 667,979	\$ 568,882	\$ 628,267	110%
Expenditures:				
1121 Salary/Wages - Extra Help	78,205	87,200	34,272	39%
1131 Salary/Wages - Overtime	240	-	-	0%
1210 Retirement - Employer	23,790	20,923	4,649	22%
1220 FICA - Employer	6,004	6,365	2,622	41%
1230 Health Ins - Employer	11,060	12,257	4,347	35%
1270 Accrued Leave CTO Payoff	2,722	-	-	0%
2011 Clothing & Personal Supplies	412	500	358	72%
2015 Inmate Clothing and Supplies	36,857	30,000	20,882	70%
2025 Cellular Communication Service	456	504	552	110%
2026 Cell Phone Allowance	38	-	-	0%
2035 Household Expense	(45)	1,500	-	0%
2120 Maintenance Equipment	3,826	-	5,035	0%
2140 Maintenance-Bldgs & Improvement	39,952	-	33,602	0%
2170 Memberships	250	125	-	0%
2171 Professional Licenses & Cert	460	-	-	0%
2180 Books & Subscriptions	11,770	15,500	4,401	28%
2200 Office Expense	776	1,500	1,024	68%
2201 Equipment Under \$1,500	15,854	18,000	95,403	530%
2203 Computer Components<\$1,500	4,546	-	-	0%
2205 Postage	898	500	1,162	232%
2206 Controlled AssetsComputer Related	-	-	29,827	0%
2239 Legal Services	55,366	70,000	43,536	62%
2245 Contracted Service	529,530	647,960	457,030	71%
2250 Other Professional Services	6,071	52,456	13,358	25%
2266 Central Data Processing	14,867	17,328	3,061	18%
2270 Software	1,660	-	-	0%
2271 Software Rental/Subscription	4,530	-	5,202	0%
2280 Publication and Legal Notices	-	-	5,914	0%
2281 Advertising/Marketing	-	-	20	0%
2301 Small Tools & Instruments	-	-	375	0%
2310 Education & Training	90,064	194,572	182,183	94%
2312 Special Departmental Expense	15,520	34,500	34,365	100%
2335 Travel Expense	7	1,000	-	0%
2336 Travel Out-Of-State	3,377	-	-	0%
2337 Meals/Refreshments	1,134	1,000	1,445	145%
3157 Employment Ancillary	-	160,054	105,509	66%
3710 Countywide Admin Overhead	8,427	18,664	18,664	100%
4301 Equipment - Vehicles	4,500	-	-	0%
4303 Fixed Assets - Equipment	34,978	31,500	6,232	20%
5010 Operating Transfers Out	265	-	-	0%
5040 Trans-out-POB's	-	1,350	-	0%
Total Expenditures	\$ 1,008,367	\$ 1,425,258	\$ 1,115,030	78%
Net Increase in Fund Balance			\$ (486,763)	

Fund Balance July 1, 2024	\$ 2,598,729
Change in Fund Balance [†]	(486,763)
Fund Balance June 30, 2025	\$ 2,111,966

[†] \$1,286.96 credit to correct a FY2023/24 expense was removed to properly reflect FY2024/25 expense.

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7 [ADDITIONAL COUNSEL

8 LISTED ON NEXT PAGE]

9 *Attorneys for Plaintiffs*

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF SOLANO**

13 BaKari Etter, by and through his Guardian ad
14 Litem, LaKetha Bairfield, Deborah Fernandez
15 Crowder Music, Kenetra Chappelle, Joseph
Duran Jr., individually and on behalf of all
others similarly situated,

16 Plaintiffs,

17 v.

18
19 Solano County, Solano County Sheriff's Office,
20 Solano County Sheriff Brad DeWall, and
iWebVisit.com, LLC,

21 Defendants.

Case No.

**PROPOSED ORDER GRANTING
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

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1 Plaintiffs' Motion for Preliminary Injunction came for hearing before this Court on
2 _____. All interested parties having appeared through counsel, and after full
3 consideration of the parties' papers, the arguments of counsel, and all other files and papers herein,
4 and for good cause appearing, Plaintiffs' motion is **GRANTED**.

5 **IT IS SO ORDERED.**

6
7 Dated: _____, 2026

Honorable Superior Court Judge