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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA (FRESNO DIVISION)

JANINE CHANDLER, et al.,

Plaintiffs,

v.

CALIFORNIA DEP'T OF CORRECTIONS
 AND REHABILITATION, et al.,

Defendants.

Case No. 1:21-cv-01657-JLT-HBK

**DECLARATION OF AMIE ICHIKAWA
 IN SUPPORT OF PLAINTIFFS'
 OPPOSITION TO MOTION TO
 DISMISS**

I, Amie Ichikawa, hereby declare:

1. I make this declaration based on my own personal knowledge. I am over the age of 18 and competent to testify. If called to testify, I could and would do so as follows:
2. I am a 40 year-old woman and resident of California. I was incarcerated in Central California Women's Facility (CCWF) from June 2009 to August of 2013.

- 1 3. In 2021, I founded Woman II Woman, a domestic California non-profit corporation to
2 provide peer support, preparedness for the Board of Parole Hearings, and to act as a
3 resource hub for women who need transitional services upon release. Prior to
4 incorporation, we had been providing these services in an informal capacity for some time
5 already.
- 6 4. We communicate with women on every yard and in every unit in CCWF daily by phone,
7 jpay (inmate email) and regular mail.
- 8 5. As a result of the time I spent personally housed at CCWF, combined with my ongoing
9 contact with women still incarcerated at that facility, I am familiar with the layout of the
10 facility, including the size and location of the living areas, the common areas, and offices.
- 11 6. CCWF has 4 yards: A, B, C, and D yards. Each unit has 32 rooms, each room houses 8
12 women. Each yard has 4 units that house women of security levels 1-4 together. Each unit
13 has 32 rooms, each room houses 8 women. This is different from men's facilities where
14 they are segregated by security levels and other factors like gang affiliation. A-yard is
15 receiving, administrative segregation, and death row. B-yard has a disability program,
16 where they house inmates with disabilities or conditions, as well as many of the elderly
17 residents, that require special care or consideration. Many of these inmates are particularly
18 vulnerable to neglect (including medical neglect) and abuse. B-yard also has the puppy
19 program, where women train service dogs. B, C and D yards are all for women of levels
20 1-4.
- 21 7. These rooms were originally designed to house 4 people. This prison always operates well
22 above capacity. During my term, rooms were almost always full with 8 prisoners, the gym
23 was used as a dorm for overflow housing and at one point there were women housed in

1 the day rooms. Each cell is approximately 246 sq. ft. and houses eight women with four
2 bunk beds, eight tall lockers, a toilet, shower, two sinks with mirrors, and a movable table
3 and chair. All photos and footage used by the media have been taken in men's prisons.
4 Women's prisons are designed entirely different and are unique in the prison industrial
5 complex. Women are not "on the tier". Our rooms are congested and on a single level over
6 600 acres. A photograph of a cell at CCWF is attached as Exhibit A. While I did not take
7 this photograph, I can attest that it accurately depicts a typical cell.

- 8 8. The toilet and shower have doors, but both doors have a huge, open hole cut out at the top
9 and at the bottom so the C.O.'s (Correctional Officers) can see who's in there and what
10 you are doing. The areas in the room are 1-4. One is the worst and referred to as "the
11 freeway" as it is next to the sinks, in front of the toilet and has no privacy what so ever.
12 Two is against a wall, three and four are the most desirable being that they are corner
13 bunks and offer the most privacy possible. There is a two foot space between those bunks
14 and their lockers.
- 15 9. These conditions are difficult to live in. The layout and limited space does cause tension
16 between room mates. Being in a position where you are observed while you sleep, shower,
17 shit and shave 24 hours a day, 7 days a week, has a deep impact on one's mental health.
18 Paranoia, anxiety, "flashing", which is what inmates refer to dissociative episodes as are
19 all indicative of symptoms of Complex-PTSD. This was my experience that was prior to
20 the implementation of SB132. These circumstances compounded with being forcefully
21 housed with men with penises is exactly how I would define cruel and unusual
22 punishment. Being that women have vaginas, the penis becomes weaponized in the mind
23

1 of the 90% of survivors of sexual abuse that make up the population of incarcerated
2 women in California.

3 10. Once you are classified and medically cleared during your time on A yard, which is the
4 reception center (approximately 6 week process) you go “over the wall” to your
5 permanently assigned housing. Not long after being housed, you receive a work ducat
6 with your job assignment. Some inmates are assigned jobs on their controlling yards as
7 porters, clerks, dining workers, etc while others are assigned jobs in other areas of the
8 prison that require them to go through “work change” to the common/shared vocational,
9 medical, central kitchen, educational, PIA, and joint venture areas.

10 11. Anyone with a ducat for medical, psych, R&R (release and receiving) where you pick up
11 quarterly packages and books, can access these open areas. The dining workers also have
12 access to neighboring yards as the kitchens are shared: A and B, C and D. I have
13 witnessed inmates use the kitchens to navigate their way to enemies. I have witnessed
14 people on ducats fight behind “work change”. I have witnessed people fight in school that
15 are all from different yards. Being housed on different yards from people with enemy
16 concerns or safety issues does not in anyway ensure one’s safety. I have attached a
17 birds-eye view of the facilities at CCWF as Exhibit B. The image is from Birds eye, which
18 is a google image, and I personally marked it up the image to indicate where yards and
19 other areas are within the facility.

20 12. When enemy concerns arise there is only one other prison most women with a security
21 level above two can transfer to: CIW. CIW does not regularly accept inmates sentenced to
22 death or LWOP because there’s no electric fence. Exceptions are made from time to time
23 but the options for transfers to other facilities are horribly limited for women. Two out of

1 the 35 prisons in California are women's prisons. This is one of the reasons many women
2 remain complacent and silent when they have issues, because there is nowhere else for
3 them to go anyway.

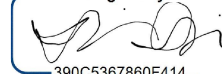
4 13. The yards are stacked against each other and are only separated by a chain link fence.

5 Anytime the yards are open and anytime inmates are allowed movement, communication
6 from yard to yard occurs.

7 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED
8 STATES THAT THE FOREGOING IS TRUE AND CORRECT.

9 SIGNED IN LOS ANGELES, CALIFORNIA ON MAY 31, 2022.

DocuSigned by:



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Amie Ichikawa

Exhibit A

EXHIBIT A



Exhibit B

Exhibit B

