BETWEEN THE BARS P.O. BOX 425103 CAMBRIDGE MA 02142

554..

WRITING A FEW WORDS FOR "BLOG READERS" AS WANTING SOME "FEED BACK" AS TO THE "PRESENTED DOCUMENTS" AS TO THE "STRUGGLES OF PRISON LIFE" FOR THE "BASIC NECESSITIES" AS MOST "CITIZENS" THINK WE ARE LIVING THE "LIFE OF" "LUXURY" BUT THEY WOULD NOT TRADE PLACES WITH ANY OF US HERE INSIDE THESE "WALLS EVERYDAY" AS WE ARE "NOT LINDSEY LOHAN" AS THEY USE HER AS A "MODEL" TO "SUPPORT" THE "PROPAGANDA" AS TO "HUMANLY TREATMENT" WHEN YOU HAVE THE "RIGHT RESOURCES" THEN YOU CAN GET "FAIR, EQUAL JUSTICE" FROM THE "JUDICIAL" SYSTEM..

BUT THE FIGHT GOES ON AS IVE GOTTEN "BAD NEWS" ON MY CIVIL SUIT FOR
BEING "DENIED SUITABILITY FOR PAROLE" EVEN THOUGH I HAVE A "WRIT OF HABEAS"
CORPUS PENDING AND IT LOOK GOOD, BASED ON RECENT LAW THAT JUST CAME DOWN
A FEW DAYS AGO..AS I "NEED AN ATTORNEY FOR MY "PAROLE LAWSUIT" OR IN THE
"ALTERNATIVE MONIES KEEP HOPE ALIVE" AS THE "GUARDS HATES ME FOR WHAT I DO
IN THE COURTS..BUT THE "BOARD OF PRISON" FEELS I SHOULD BE HERE BUT IVE
"SUCCEEDED" IN MY "GOAL" AS BEING A "LEGAL ASSISTANT" AS GETTING A "JOB"
IS THE "HARD PART"..

PLEASE WRITE ME DIRECT ..

JIMMIE STEPHEN C56483 22-H3-L P.O. BOX 4000 VACAVILLE CALIFORNIA..95696

DATE 5-9-11

Jan Alla

Am Slephe

JIMMIE STEPHEN C56483 CSP-SOLANO 22 H3 L PO BOX 4000 VACAVILLE CA 95696-4000

Pimp My 'Fro



JIMMIE STEPHEN C56483 P.O. BOX 4000 VACAVILLE CALIFORNIA ...

> CV-09-1516--MCE-K.TM CV-10-1678-KJN-PC

DEAR ATTORNEYS

I AM REQUESTING REPRESENTATING IN "PRO BONO" AS TO ONGOING "CIVIL RIGHT" CASES PENDING IN USDC EASTERN DISTRICT UNDER "42 USC 1983"EVEN THOUGH I AM "SKILLED IN LAW" AND "LITIGATION" I NEED THE OUTSIDE INTERVENTION BASED IN PART TO "RETALIATION"..AS THESE 2 CASES MAY BE "DOWNLOADED"..

- 1. THE FIRST CASE 1516 DEALS WITH "DENTAL DENIAL" SINCE 2005. AS ACCEPTED UNDER "IMMINENT DANGER EXCEPTION" UNDER 28 USC 1915-G. WITH WARDENS BEING ALSO RESPONSIBLE FOR "OVERCROWDING CAUSING DISEASES" INCLUDING "VENTILLATION SYSTEM" AS T WAS "NO HAPPY" SO I WENT, TO 9TH CIRCUIT ON "REST OF ISSUES" THEY WERE DENIED AS LACK OF "JURISDICTION" ...
- 2.. THE "SECOND CASE" INVOLVES THE "FIRST CASE" "GRANTING" COMPLAINT AS TO WARDENS HERE AT SOLANO AS TO "OVERCROWDING" AND "VENTILLATION" WHEN "TESTED "POSITIVE" AFTER "PROLONGED" "REQUESTED" "COLONOSOPY EXAMINATION" SINCE ARRIVAL OF 11-18-08. AS "DENIED" PROLONGED WILLFULLY". WITH "RISK OF HARM"...

AS AFTER FIRST SUMMONED FOR "COLONOSOPY" ON 1-8-10 OVER ONE YEAR SINCE ARRIVAL AS ON "5" DIFFERENT APPOINTMENTS FOR "COLONOSOPY" DID IT OCCUR ON 6-7-10 AS DOCTOR ORDERED REFERRED FOR "URGENT" "EMERGENCY" "SURGERY" AS THE "SURGERY" DID "NOT" HAPPEN UNTIL 7-21-10..OVER "45" DAYS..AS I DID AN "URGENT" "EMERGENCY" APPEAL AND DID THE ORIGINAL LAWSUIT BY HAND AS I KNOW THEY SCAN YOUR MAIL HERE. . SO I MANAGED TO "FILE" BEFORE THE SURGERY TOOK PLACE AS SOON AS THEY FOUND OUT THEY "ORDERED" THE "SURGERY"...

AS IM WAITING FOR THE COURT TO ISSUE "RUILING" ON 1678.. PLEASE RESPOND:

Jan Stoller

JIMMIE STEPHEN C56483 22-H-3-L P.O. BOX 4000

VACAVILLE CALIFORNIA. 95696.

APR 2 7 2010

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICTOF CALIFORNIA
DEPUTY CLERK

"ORIGINAL PAGES # 10...

"PRATT V ROWLAND" 65 F3D 802

(9TH 1995)..

"JURISDICTION".. WHEN ONGING "RETALIATION" ECT. AS TO
"DEFENDANTS" WHEN "TRANSFERRED" FROM "PRISON TO PRISON".."WILLFULLY".

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

JIMMIE STEPHEN C#56483	CV-09-1516-MCE	
(Name of Plaintiff) P.O. BOX 4000-20-A-2-UP	(Case Number)	3
(Address of Plaintiff) VACAVILLE CALIFORNIA95696		
*.	5.	
VS.	COMPLAINT	
	"CORRECTED" AMENDED # 2.	
"DR F. ZHANG"	"FRCP" # 15	
	WITH "SUPPLEMENT"	
ET AL DEFENDANTS		
(Names of Defendants)	-	
I. Previous Lawsuits:		
I. Previous Lawsuits:	7	(X .
A. Have you brought any other la	wsuits while a prisoner: XYes	□ No
B If your answer to A is yes how	many?: Describe the	lawsuit in the space
below. (If there is more than one lawsuit,		
using the same outline)	ER" DATED 4-15-10)	
1. Parties to this previous laws	uit:	
Plaintiff	JIMMIE STEPHEN C#56483	
Defendants		
Detendants	"DR HOXIE" ET AL DEFENDANTS	<u> </u>
	Y A PRISONER IN FILING A COMPLAINT	
INDED THE C	WII DICTLE YOU AS IT OF 1003	D 17 C 100

2	. Court (if Federal Court, give name of District; if "USDC" CENTRAL LOS ANGELES CALIFORNIA		of County)
3	. Docket Number08-56533		
4	. Name of judge to whom case was assignedA.	H. "STOTLER"	
5	. Disposition (For example: Was the case dismissed? Wa		
6	. Approximate date of filing lawsuit5-16-08.		
7	. Approximate date of disposition2-26-	10	
II. Exhaus	tion of Administrative Remedies		2
A.	Is there a grievance procedure available at your inst	titution?	□ No
В.	Have you filed a grievance concerning the facts rela		
	If your answer is no, explain why not	⊠ Yes	
C.	Is the grievance process completed?	₩ Yes	□ No
III. Defend	lants		
pos for	Item A below, place the full name of the defendant ition in the second blank, and his/her place of employment of a	oyment in the third blan any additional defendan	nk. Use item B
A. ''S	Defendant "F, ZHANG" is OLANO STATE PRISON" at 2100 PE	s employed as <u>"'DENTI</u> 'ABODY RDVACAVILL	ST" E CALIFORNIA
		95969	
4	Additional defendants 1"C/O GUERRERO".2"DR "C/O MOSBY"5"C/O PINES"6"LTA KOSH	ER"7"C/O RICHA	RDSON"
8.,	"WARDEN HAVILAND"9 WARDEN SISTO"10.	."WARDEN SWARTHOUT	"11WARDEN
	OWN"12"DIRECTOR TILTON" 13"SGT CL		
11 RDr	R TILTON"16"CCPOA PRESIDENT JIMENEZ".	.1/''GOVERNOR SCH	ARZENEGGER'' &
"JI	T" "ALL DEFENDANTS" RESIDE AT "SOLANO" STA MENEZ""SCHARZENEGGER" "ALL DEFENDANTS"	"SUFP" IN "INDIVID	TAL AND OFFIC-
LAL	CAPACITY. UNDER "COLOR OF LAW" AS A "CD" 3). "BOARD OF PRISON TERMS". (32). DEFENDANT	CR FMPLOYEE". ECT.	, OFFICE
(10	. (32). ARLEMAN		E NEXT PAGE)

Case 2:09-cv-01516-MCE-KJM Document 31 Filed 04/27/10 Page 3 of 10 "DEFENDANTS": EMPLOYED AT "BPT" P.O. BOX 4036 SACRAMENTO CALIF 95812-4036..(1).R."OYEYEMI""PSYCH".. "DEFENDANTS: EMPLOYED AT "CMC": (10.. "DR HOXIE".. (2).. COUNSELOR "OSHIRO"..(3)..M."CORNELIOUS"..(4)..WARDEN "MARSHAL".
(5)D.C. "CASTILLO".. P.O. BOX 8101..SAN LUIS OBISPO. "DEFENDANTS": EMPLOYED AT "DONOVAN" AT 480 ALTA RD SAN DIEGO CALIF. (1)"DR LEE"(2)"DR ANTIQUE"(3)"SGT J.N. CLARKE"(4)"SGT "ARMENTA" (5) M. "ESPINUZA" (6) "WARDEN HERNANDEZ"...

(8) W. "SORIANO"

Do not give any legal arguments of cite any cases of facts statutes. Attach extra sheets if necessary.) UPON "ARRIVAL" OF 11-14-08 FROM "CMC" PRISON PLAINTIFF WAS SUPPOSE TO BE PLACED ON "PRIORITY DENTAL LIST" FOR "PARTIALS" DENTURES" BUT IS "PRESENTLY" BEING "DENIED" "RIGHT TO EAT PROPERLY" WHEN "GUMS BLEED" WITH "NERVES" EXPOSED" ECT BY "DR ZHANG" WHEN "PAIN EXIST" AS "PARTIALS WILLFULLY DENIED" DEPRIVED" SINCE 2005. AS "BASIC HUMAN NEED". BASED ON "WILLFUL OVERCROWDING"AS "TACTICS" BY "CDCR" IN PAST IS "TRANSFER FROM PRISON TO PRISON"..GFROM 3-27-07 WILLFULLY TOLD BY "DR HOXIE" OF "CMC" AS TO "NOT HAVING ANY SUPPORT" FOR "PARTIALS" ON "RIGHT SIDE OF MOUTH" AS ALL "TEETH" WERE "WILLFULLY EXTRACTED" WHEN COULD'VE BEEN "SAVED"AS "TEETH" TIL 11-14-08. ONGOING" "DENTURES" PARTIALS" DENIED".

OR "ALTERNATIVE" TO "PARTIALS" WHEN "NO TEETH" TO "SUPPORT" DENIURES" ECT..

V. Relief. "FARROW V WEST" 320 F3D 1235. (11TH 2005) STATE "IMMINENT"

DANGER EXCEPTION" APPLICABLE WHEN DENIED "DENIURES" FOR "15" "MONTHS" ... (CONTINUED NEXT PAGE).. (State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.) IST 5TH 8TH 14TH A..""JURY TRIAL DEMANDED" B. . 'DAMAGES' IN SUM OF \$10,000 EACH DEFENDANT PLUS \$100,000 PUNITIVE EACH.. C. ."INJUNCTIVE" RELIEF AGAINST "RETALIATION" "MEDICAL" DENIALS" OR ANY TYPE OF "LIMITATIONS" TO MAKE "TOOTH" FUNCTIONS "WHOLE".. D. . "ORDER STRIKING" "3-STRIKE ORDER" OF 2006. UNDER "FRCP # 12-B... E. . "APPOINTMENT OF ATTORNEY" FORTHWITH.. F. "SINGLE BED" CELL STATUS".. FORTHWITH.. Signed this 24THday of APRIL (Signature of Plaintiff)

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

· 4-24-10 · . (Date)

1 ..

(Signature of Plaintiff)

"CONTINUED" ...

"TRANSFER" "FROM PRISON TO PRISON" # 1-A. "DELIBERATE INDIFFERENCE"
"RECKLESS DISREGARD" WHEN
"SERIOUS DENTAL" NEEDS
"WILLFULLY" "DEFENDANTS.

."DR ZHANG"..

2. "DR HOXIE".. 2.."DR HUALL 3.."DR LEE"..

4.. "DR ANTIOUE" ...

PLAINTIFF "DENTAL NEEDS" RISE TO RISKS" OF "FUTURE HARM" WHEN BASED IN "2 PARTS" THE "RIGHT TO DENTURES, PARTIALS" ARE "WILLFULLY" "DENIED""DELAYED" BASED ON "WILLFUL OVERCROWDING" SINCE 5-1-05 AS ARE "ONGOING" AS OF 9-26-09. AS ALL "RIGHTS CHILLED". IST,5TH 8TH & 14TH..

WHEN PLAINTIFF HAS "ONLY ONE TOOTH" TO "CHEW" ON IN "BACK OF MOUTH"...
B. THE "2ND" PART WHEN "GUMS DECLINE" AWAY FROM "TEETH" EXPOSING
SENSITIVE NERVES" THAT PRODUCE "PAIN WHEN BRUSHING" TOUCHING" ECT... WITH "RISKS OF INFECTIONS" INTURN WITH "RISKS OF MORE SERIOUS" "AIL-MENTS" INCLUDING "POISONING OF THE BLOOD STREAM" AND "RISK OF HEART"

"ATTACKS" ECT.. "ONGOING AS OF 9-26-09".. "PAIN AND SUFFERING".. ECT..
C..AS_"DENTIST_ZHANG" WILLFULLY DENIED"TEETH""TREATMENT_SINCE_11-14-08. ARE "WILLFULLY" PLACING PLAINTIFF "LIFE" WELL BEING AT RISKS". WHEN PRACTICE AT "SOLANO" IS "EXTRACTIONS". EVEN THOUGH PLAINTIFF "SERIOUS DENTAL NEEDS" IS "2 PART". AS OF 9-26-09. AS THE EXCUSE OF "FUNDS" BY "ZHANG" AND "CDCR" VIOLATE THE "8TH AMENDMENT"...

D...TO "THWARF" PLAINTIFF "ACCESS TO DENTAL" THE POLICY CUSTOM PRACTICE IS TO "WILLFULLY" TRANSFER FROM PRISON TO PRISON". AS PLAIN-TIFF HAS BEEN TO "3" "PRISONS" SINCE "2005". WHEN RIGHTS TO "IST" AMENDMENT PROTECTED RIGHTS OF ACCESS" "PRACTICED BY FILING GRIEVANCE" FOR "SERIOUS DENTAL NEEDS". "FROM 5-1-05" TO 3-27-07 "DENIED" RIGHT"
TO "TEETH" OR "DENTAL TREATMENT" BY "LEE" ANTIQUE" AND HOXIE ... ONGOING"...

E.. "INJURIES" ARE "ONGOING" AS TO "SERIOUS DENTAL NEEDS" AS OF 9-26-09 INCLUDING "PAIN" "PAIN AND IRRITATING WHEN BRUSHING TEETH" INCLUDING "BLEEDING" "SORENESS" WHEN "NERVES EXPOSED" AS IN PART DOES PLACE PLAINTIFF "HEALTH AND SAFETY" IN "JEOPARDY" WHEN "WIRES" FROM "PARTIALS DENTURES" "IRRITATE" THE "NERVES" OF "DECLINE GUMS" WHEN "NERVES EXPOSED". FROM 3-27-07 TIL 11-14-08""DR HOXIE" "WILLFULLY DENIED"
"TEETH""TREATMENT" ECT. "ONGOING AS OF 4-20-10". "FARROW V WEST" 320 F3D

1235.(11TH 2005)..

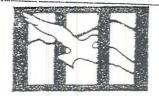
#-2."DECIBERATE INDIFFERENCE" "RECKLESS DISREGARD" WHEN "SERIOUS" MEDICAL" NEEDS "WILLFULLY DELAYED"...

"DEFENDANTS":

1.."DR CHEN":: 2.. "C/O RICHARDSON" ...

UPON "ARRIVAL" OF 11-16-08 PLAINTIFF "MEDICAL" CONDITION CHANGED WHEN "OVERCROWDED DORMS" AND "GERMS" CAUSED PLAINTIFF "SERIOUS FLU" "INFECTIONS" OF THE "THROAT AND MOUTH""NOSE" AREAS..AS WAS "WILLFULLY DENIED" RIGHT TO SEE "DR CHEN" UNTIL 1-5-09. WHEN "OVERCROWDED". AREA AS "RISKS OF CONTACTING HIPATITUS" AND OTHER DISEASES WHEN PLAINTIFF "CONTRACTED TUBERCULOSIS" IN 2005. WHEN "SCREENING" PRACTICES OF THE HOUSING AT SOLANO IS "INADEQUATE" WHEN "DORMS BREED DISEASES" WHEN "VENTILIATION SYSTEM" IS "INADEQUATE" AND KNOWLEDGE OF "WARDEN SISTO" -"SWARTHOUT"...AS OF 9-26-09...AS "IMMINENT DANGER!" "SERIOUS PHYSICAL". "INJURIES".. WHEN "HEART BYPASS" AND "PUNCTURED LUNG" CONTRIBUTE TO A "CHRONIC NEEDS" WITH PRIORITY CARE, AS OF 4-20-10"ONGOING"...

> "ANDREWS V CERVANTES" 493 F3D 1047(9TH 2007).."IMMINENT DANGER" EXCEPTION" WHEN PLACED WITH EXCESS TO "DISEASES" ...



MEMORANDUM

PRISON LAW OFFICE

General Delivery, San Quentin. 2A 94964-0001 Telephone (415) 457-9144 * Fax (415) 457-9151 www.prison.aw.com

Director: Donald Specter

Staff Attorneys: Susan Christian Steven Fama Rachel Farbiarz Penny Godbold Megan Hagier

Alison Hardy 🗸 Vibeke Martin

Millard Murphy Sara Norman

Zoe Schönfeld

Judith Rosenberg

E. Ivan Truiillo

Date:

From:

To:

1/25/2008

Alison Hardy/SW

Re:

Perez 3 - Individual Inmate Exhausted Dental Concern - Request for Review

Jimmie Stephen, C-56483

CMC

Charles Antonen. Deputy Attorney General

Mr. Stephen has exhausted his administrative remedies on the issue of receiving repair of his teeth (IAB # 0708017, Log # CMC-07-01748).

According to the Second Level's Decision, Mr. Stephen was classified as Priority 2 on 5/8/07. The response goes on to state that Mr. Stephen was triaged for a "new and separate dental issue" on 6/13/07, which was resolved on 6/19/07. The response, which was written on 8/29/07, states that Mr. Stephen "would continue to receive treatment as a DPC 2 patient."

Mr. Stephen writes that he still has not received partials or treatment to repair his teeth.

Please respond to the following:

- 1. When did Mr. Stephen last see a dentist regarding the possible need for partials or repair of his teeth? What were the results of this appointment?
- 2. Please describe Mr. Stephen's current treatment plan.

Board of Directors

Penelope Cooper, President . Michele Walkin Hawk, Vice President . Marshall Krause, Treasurer Honorable John Burton · Felecia Gaston · Christiane Hipps · Margarer Johns Cesar Lagleva · Laura Magnani · Michael Marcum · Ruth Morgan · Dennis Roberts

"RIGHT, PRIVILEGE" TO OWN "TELEVISIONS" WHEN OVERCROWDED"..ECT

2-A. THE "DORMS OF SOLANO YARD # 4" HAVE "ONE TOILET" PER "30" PRISONERS AS "INADEQUATE" AND "HEALTH AND SAFETY" "RISK". ON 8-30-09 PLAINTIFF REQUESTED "DISINFECTANT" FROM "C/O RICHARDSON" AND WAS IN-TURN "WILLFULLY DENIED" WHEN I WAS "NOT TALKING TO HIM BUT A "FEMALE" "GUARD"...AS MORE LENIENT...AS "TOILETS" SINKS" "MUST" BE "STERILIZED" "AFTER EACH USE" THIS IS DENIED UPON "APPEAL" WAS "DENIED BY "WARDEN BROWN" .. UNDER "HAVILAND" .. "AIDS" "HIPATITUS" "VALLEY FEVER" "PLUS" "TB" ARE "CONTRACTED EASILY" IN "DORM SETTING" ESPECIALLY WITH "3-TIER"
"BEDS" ECT.. "WARDEN SISTO" IS AWARE OF THIS PROBLEM. AIDED BY "JIMINEZ"...
B.. "BASIC HUMAN NEEDS" INCLUDE PROTECTION FROM "RISKS OF DISEASE

OR CONTAGIOUS DISEASES"...WHEN "VENTILLATION SYSTEM" IS "INADEQUATE" AS 'WARDEN SISTO'"HAVILAND'"BROWN'"SWARTHOUT" ARE AWARE OF THE STATE OF "VENTILLATION" IN "DORMS # 20,21,22,23" WHEN "DORMS # 19, AND 24" "ONLY HOUSE MEDICAL WITH AIR CONDITIONING" NEEDS SUCH AS "HOT MEDS"... AND "PSYCH MEDS"..AS "DORMS # 20-23" "VENTILIATION" WHEN REACHES 90 DEGREES "MUST HAVE A FAN" BUT "PROVIDES INADEQUATE" "AIR" BASED ON "NO CIRCULATION OF COOL AIR" WHEN "FANS" BLOW OUT "HOT AIR" .. CAUSING "EXTREME HARDSHIP" AND "PAIN UNECESSARILY". AS OF 9-26-09 "ONGOING".
WHEN "OVERCROWDED" AS "RISKS OF VIOLENCE" DISEASES" AS A "BASIC HUMAN NEED". IN ADDITION THE "WILLFUL CONFISCATION OF TELEVISIONS" OF 6-30-09 ADDS FURTHER "RISKS OF VIOLENCE" ECT. "SAFETY AND SECURITY". . ECT. . (DISINFECTANT DISPENSERS DENIED) 5TH, 8TH AND 14TH VIOLATED & IST.. BY "WARDEN BROWN" OF 8-30-09).. "ONGOING AS OF 4-20-10"...

> # 3.. "SELECTIVE RETALIATION" WHEN "WILLFULLY FILED FALSE" AND "MISLEADING CHARGES" FOR "IST" AMENDMENT ACCESS TO COURT" ...

"DEFENDANTS":

1.. "PINES"... 2..'MOSBY''...

ON 3-28-09 PLAINTIFF WAS "WILLFULLY" SUBJECTED TO "SELECTIVE" 4.. "SGT CLARK".. AND "DISCRIMATORY" "RETALIATIONS" BY "C/O PINES" AND "C/O MOSBY"
IN CONCERT. WHEN PLAINTIFF REQUESTED "PASS TO LAW LIBRARY" AS "PATTERN" OF PLAINTIFF SINCE 11-14-08..ON 3-28-09 PLAINTIFF FIRST REQUESTED A "PASS AT 7;00 AM" TO 'MOSBY" AND TOLD TO COME BACK AT 8;30 AM..AT 8;15 AM 'MOSBY' TOLD PLAINTIFF TO ASK "PINES" WHOM STATED SHE WOULD NEVER "WRITE PLAINTIFF A PASS EVER" AND "YELLED" FOR PLAINTIFF TO GET AWAY FROM "DESK" AS POLICY, CUSTOM, PRACTICE, OF "PINES" IS TO "PROVOKE" INCITE" TO "PUSH ALARM" TO "SEGREGATE" OR "RISK OF VIOLENCE"...

B. PLAINTIFF SAT AT "TABLES ABOUT 12 FEET AWAY" AND WATCHED C/O "MOSBY" "WRITE 3 PASSES" TO LIBRARY. AS THE PRACTICE OF SOLANO 4 YARD WHEN YOUR "BUILDING HAS LAW LIBRARY" EVEN THOUGH YOUR "BUILDING DONT" YOU MAY GO TO "LIBRARY WITH PASS"..OF 3-28-09..PLAINTIFF "HAD LIBRARY FROM 7;30 AM TO 2;00 AM. AS WAS "WILLFULLY DENIED" WHEN OTHERS WERE ALLOWED AS HAD 'NO CONFRONTATION PERSONALLY WITH 'MOSBY' OR 'PINES' BEFORE THE ACTS OF 3-28-09.. "ONGOING RETALIATION AS OF 4-20-10".. C..ON 3-28-09 "PINES" DID "FABRICATE WRITE UP" TO "CAUSE HARM"

"DENY PAROLE" OR "RISKS" ECT..THE "WRITE UP" CONSISTED OF PLAINTIFF
ALLEGED "LOOKING AT HER" ..AS PLAINTIFF WAS IN FACT LOOKING AT "MOSBY
AND PINES" AND SAW "RIGHTS WILLFULLY VIOLATED" "WHEN MOSBY WROTE" "3"
"PASSES TO LIBRARY" THIS DAY 3-28-09. "ONGOING RETALIATION" AS OF 4-20-10..

D. "PINES WRITE UP" FOR "LOOKING" WHEN "HER DESK SITS IN FRONT"

OF "OPEN SHOWERS" AND "OPEN TOILETS" ALL "MALES". "WHEN OPEN BUILDINGS".

E.. PLAINTIFF OF 3-28-09 REQUESTED TO SEE "SARGEANT" AND WAS DENIED BY "MOSBY" AND "PINES" AS A "RIGHT" WHEN DENIED "LIBRARY" WHEN

"BUILDING # 20" HAD "LIBRARY ACCESS" OF 3-28-09. FROM 7;30 TO 2;00 AM
AND WAS DENIED ACCESS". "YARD OF 3-28-09""OPENED AT 12;30 AM..
F.. AT 12;30 AM PLAINTIFF WENT TO AND SAW "SGT ECK" WHOM WILLFULLY "STATED PLAINTIFF HAD TO GO TO LIBRARY WHEN HAD YARD AS THIS
IS "NEW POLICY" BY "ECK" AS ON "APPEAL" SAME STATED BY HEARING "SGT CLARK" OF 4-30-09..AS "NO NOTICE OR CHANCE TO APPEAL" "NEW RULE" AS BEEN GOING TO LIBRARY SINCE 11-14-08" ON "ARRIVAL". BY "PASS" WHEN "PLAINTIFF BUILDING HAS LIBRARY" BUT "NO YARD"...

G.. "RISKS OF SAFETY AND SECURITY" BY ACT OF A "CAMPAIGN OF HARASSMENT" FOR "IST AMENDMENT PROTECTED RIGHTS"..WHEN "PATTERN EXIST OF RETALIATION" AS ON 8-9-05 11-27-05 AND 9-19-06 PLAINTIFF WILLFULLY "SEGREGATED" AS "ALL "3""DISMISSED" ON "APPEAL" ECT. 228 DAYS SEGREGATED".

H. "PINES" ECT AS "HOUSING OFFICER" IS RESPONSIBLE FOR "COMPATI-BLE'"CFLIMATES" FOR PLAINTIFF SINCE 1-18-09 AS "DENIED""5 TIMES".

I. "RISKS OF DENIAL OF PAROLE" FOR "WRITE UP "CHRONO" OF 3-28-09..

BY "PINES" AIDED AND ABEITED BY "MOSBY". AS "BPT HEARING OF 7-14-10". IST 5TH & 14TH...

> # 4.."DUE PROCESS""EQUAL PROTECTION OF LAW" AS "BASIC HUMAN NEED"..

"DEFENDANTS": 1.. "KOSHER".. 2.."B.P.T."..

ON 4-10-09 PLAINTIFF OVERHOOD "LTA KOSHER" STATE WHEN LAST "2" "TYPEWRITERS ARE BROKEN" THEY WOULD "NOT BE REPLACED" AS PRACTICE OF "LTA KOSHER" IS TO "WILLFULLY DESTROY TYPEWRITERS WHEN REPAIRABLE" SINCE "ARRIVAL" OF 11-14-08. AS "NEW POLICY" OF "NOT REPLACING TYPE-WRITERS" OR "ELIMINATING OF TYPEWRITERS" VIOLATED "RIGHTS TO DUE PRO-CESS"..ECT..OB "CHANCE TO APPEAL".. "NO NOTICE" BY "KOSHER"..

B. PLAINTIFF "RISKS" OF "PAROLE DENIALS" WHEN "LIBRARY" OFFERS "BOARD OF PRISON TERMS" "TYPING SKILLS" PARALEGAL "LEGAL ASSISTANT" "BOARD OF PRISON TERMS" "TYPING SKILLS" PARALEGAL "LEGAL ASSISTANT
"LEGAL RESEARCH" ECT. AS WELL AS "ELIGIBILITY OF EMPLOYMENT". AND THE
"HIGH STANDARDS OF BPT" AS WELL AS "BPT MANDATORY INSIGHT" IS FORFILLED BY LIBRARY AS OF 9-26-09. AND "GRANTING OF PAROLE". AS UNDER
"SHAPIKUS" "INSIGHT" IS "MANDATORY" AS "LAW LIBRARY" FORFILLS THESE
STANDARDS OF "BPT". BY "SCHARZENEGGAR" AND "M. JIMINEZ" "DENIED".

C. AS AN "ADA" PLAINTIFF "DISABILITIES" INCLUDE "UN LEGIBLE"

"DOCÚMENTS" TO THE COURTS AS REQUIRE "LEGIBLE DOCUMENTS" WHEN FACTS STATE "TYPED DOCUMENTS" ARE "MORE LIKELY" TO BE "HEARD" THAT "NON" "TYPED DOCUMENTS" FOR "ACCESS TO COURT". "AS OF 4-20-10 ONGOING"...

D. THE "EDUCATION DEPT AT SOLANO" CONSISTS OF OVER "50" OR MORE "TYPEWRITERS" THAT DO NO MORE THAN MENIAL TYPING OF DAILY "ROSTERS" WHEN LIBRARY "TYPEWRITERS MUST BE LEGAL TYPING" ...

E.."CERTIFICATION OF LAW LIBRARY" IS "MANDATORY" AS "SAME" "STATUS" AS A "CHURCH". WHEN MANDATORY TO HAVE "PULLPIT" AS "LAW LIBRARY" "MUST HAVE TYPEWRITERS"...EQUAL PROTECTION OF LAW". AS "WARDEN BROWN "HAVILAND" SISTO" SWARTHOUT" ARE AWARE OF THE "LIBRARY" PROBLEMS ECT.

F.."INMATE WELFARE FUNDS" MEAN "MONIES" "WILLFULLY CONFISCATED" WHEN PLAINTIFF PURCHASE FROM "CDCR VENDORS" ECT. AS THESE "MONIES" ARE "SUPPOSE TO BE USED FOR "TYPEWRITERS" SPORTS EQUIPMENT" MOVIES"... AS THE "RISKS OF FREEDOM""BY DENIAL OF PAROLE" WHEN "PROPOSITION # 9" 'MANDATE UP TO 15 YEAR DENIALS' BY "BPT". AS OF 9-16-09'ONGOING".
WHEN "PROPOSITION # 9" IS BEING "ILLEGALLY" USED OF 7-14-10 AS PLAINTIFF "ARRESTED" OF 6-6-89 BY "BPT" AND "SCHARZENEGGAR"..AS "EX POST FACTO".. IST. 5TH & 14TH..

"DEFENDANTS":

5.."CAMPAIGN OF HARASSMENT"

"ABUSE OF AUTHORITY" BY

"RETALITORY TACTICS"..

"WILLFULLY"..

1.."GREEN".
2.."CORNELIOUS"..

3.."OYEYEMI"...

UPON "ARRIVAL OF 11-14-08" PLAINTIFF WAS "ASSIGNED" "COUNS-ELOR GREEN" WHOM DUTIES IS TO "RECORD FROM C-FILES" "CORRECT" AND "LEGAL AUTHENTIC" "CERTIFIED DOCUMENTS" INFORMATION TO "ENHANCE" "CHANCES OF PAROLE BY BPT" BY "JOBS, "EDUCATION" BY GPL" "CHRONOS" AS BUT ON 12-2-08 THE DATE OF "INITIAL 3 PANEL CLASSIFICATION" PLAINTIFF WAS "REFERRED AS A MENTAL DISORDER OFFENDER" OR "MDO" "WITHOUT NOTICE" OR "CHANCE TO APPEAL". AS ACTS OF 12-2-08 WERE "WILLFULY" WHEN PLAINTIFF "PRESENT" AT "HEARING OF 12-2-08". WHEN UPON "3" OR MORE "REQUESTS" "COUNSELOR GREEN" REFUSED TO SEND A "COPY" OF SAID "CLASSIFICATION HEARING" OF 12-2-08.

B. PLAINTIFF THROUGH "APPEALS OFFICE" FINALLY FORCED "GREEN" TO "PRODUCE A COPY" OF SAID HEARING AS "RECEIVED 3-5-09". AS THE STATED "INFORMATION IS CONTAMINATED" AND "RISKS OF PAROLE OF 8-9-10 BY BPT" IS "HINDERED" OR "CHANCES ARE "NON EXISTANT". WHEN "NO DIPLOMA" WITH AN "FALSE" _ GPL OF 4.0". AS "PATTERN" OF "RISKS" OF "PAROLE" BY "CORNELIOUS" FOR ACTS DID OF 6-6-07 AT "CMC" WHEN "WILLFULLY PLACED IN SCHOOL" WHEN HAVE "HIGH SCHOOL DIPLOMA" OF "1971". AND UPON "APPEAL" WAS "WRITTEN UP" BY SAME LADY WHOM TOOK "APPEAL" OF 6-6-07. WHEREBY "CONTAMINATING ENTIRE C FILES". AS A "RIGHT TO WORK PIA" "DENIED" AS OF 12-2-08" ONGOING" WHEN "WORKED" "PIA" "PRIOR TO WRITE UP OF 6-6-07" FOR ALLEGED "NOT PARTICIPATING AS "INJURY" INCLUDES "DENIAL JOBS" "TRADES" "A-1-A" STATUS". ECT. AS "ONGOING" AS OF 4-24-10. "RISKS OF DENIAL OF PAROLE" INCREASED.

C.. THE "REFERRAL AS A MDO" CONSISTS OF "RISKS OF POSSIBLE TASCADERO" HOUSING WITH "MANDATORY MEDICAL" MEDICINES" TO "THWARF THINKING CAPACITY" ECT. AS ACTS BY "GREEN" OF 12-2-08" "NEGATE" "PAROLE ELIGIBILITY" BY "CONTAMINATED C FILES" WHEN "GREEN" IS "SCHEDULED" TO DO PLAINTIFFS "BOARD OF PRISON TERMS" REPORT OF 7-14-10... "WITH RISKS OF HARM" BY "DENIAL OF PAROLE" WILLFULLY"... "WHEN WILLFULLY WITHELD".BY "COUNSELOR GREEN" NO NOTICE". AS OF 2-11-10 "PSYCH OYEYEMI" USED THESE "FALSE REPORTS FOR "BPT" ASSESSMENT" FOR 7-14-10..TO "MISLEAD" TO DENY "ELIGIBILITY FOR RELEASE" ECT IST,5TH &14TH...

#"6.."WILLFUL CAMPAIGN OF HARASS-MENT" FOR "IST AMENDMENT" "PROTECTED RIGHTS"..

"DEFENDANTS":
1.."GUERRERO"...

PLAINTIFF UPON "ARRIVAL AT SOLANO ON 11-16-08 WAS "WILLFULLY"
"RELOCATED TO A 3-TIER" BUNK AS A "LIFER" PRISONER WHEN ""3-TIER
BUNKS ARE ILLEGAL"..AS "HIGH RISK OF DISEASES" AS PLAINTIFF DID
CONTACT AN "INFECTION" IN "THROAT""NOSE""MOUTH" ECT..WHEN BUNKS
ARE "SIMILIAR TO A DEAD PERSONS COFFIN" WHEREAS "CANNOT" "SIT UP
OR EXERCISE ON BUNK"..WHEN OTHERS WITH "2-TIER" BUNKS CAN..

B. ON 11-25-08,12-1-08, AND 1-7-09 PLAINTIFF WAS WILLFULLY "HARASSED""THREATENED" BY "C/O GUERRERO" TO SIT ON "STOOL" FOR "COUNT" AS THERE ARE "SPECIAL STOOLS" FOR "3-TIER" "BUNKS" WHERE AS SHOWING "KNOWLEDGE" OF VIOLATIONS OF 8TH. BY WARDEN"SISTO" "JIMINEZ" "HAVILAND""BROWN""SWARTHOUT""TILTON". ECT. WHEN "RISKS OF DISEASE "VIOLENCE""WHEN "DISINFECTANT DISALLOWED" TO "POPULATION" WHEN OTHER PRISONS HAVE "DISINFECTANT DISPENSERS". AS "BASIC HUMAN NEEDS". AS "RELOCATED OF 1-17-09 AFTER WROTE GUERRERO" UP. "AS" PLAINTIFF "PRIOR CONTRACTED" THE "TB YIRUS" OF 5-1-05 IN"OVERCROWDED""PRISONS" UNDER HERNANDEZ, MARSHAL, SISTO". ECT. IST, 5TH 8TH, 14TH.

"ONGOING AS OF 4-20-10"..

Case 2:09-cv-01516-MCE-KJM Document 31 Filed 04/27/10 Page 10 ANTS''. 1... OSHIRO''

"OVERALL IMMINENT DANGER EXCEPTIONS" UNDER "28 USC 1915"... "WHEN WILLFULLY""TRANSFERRED" FROM "PRISON TO PRISON" "TO THWARF LITIGATIONS"ECT ... AS "PATTERN" ...

2.. "BRAVO" ... 3.."SGT ARMENTA"... "ESPINOZA" ... "SGT CLARKE" 6. "BELTON" 7.."SORIANO" 8.. "CASTILLO"...

PLAINTIFF "COMMITTMENT OFFENSE" "NEGATES" "INTEGRATION" UNDER THE "JOHNSON" AND "CDRC RULES" BUT PLAINTIFF "WILLFULLY RETALIATED" BY "COUNSELOR OSHIRO" OF 6-1-08 WHEN HE "WILLFULLY APPROVED" PLAINTIFF FOR "INTEGRATED CELLMATE WHEN INTEVIEWED" PERSONALLY WITH "CONTAMIN-ATED" "C FILE" UNDER "3269" IS "WILLFUL ERROR" AS DONE TO "CAUSE HARM" TO "RETALIATE" TO INJURE" ECT. FOR "IST AMENDMENT PROTECTED RIGHTS OF" "ACCESS TO COURT" FOR "FILING GRIEVANCES" ECT. AS ARRIVED AT "CMC ON 3-27-07 FROM DONOVAN ..AS "APPEALS COORDINATORS""VELA" AND "ENGLER" "WILLFULLY" REFUSED TO ENTERTAIN APPEALS FOR 3269 VIOLATIONS AS WAS "TRANSFERRED ON 11-14-08 TO "SOLANO"..AS "TRANSFER FROM PRISON" TO PRISON" TO "THWARF"IMMINENT DANGER EXCEPTION"...WHEN "UNREASONABLE RISKS" TO "CAUSE HARM" BY "OSHIRO" UNDER "MARSHAL" ...

(A).. THE "C FILE" IS "SAME REPORTS" USED BY "PSYCH OYEYEMI" OF 2-11-10 TO DO "BPT REPORT" FOR SCHEDULED HEARING OF 7-14-10..AS WELL AS THE "WILLFUL MDO" REFERRAL OF 11-14-08 BY "COUNSELOR GREEN". "CONTAMINATION".

(B)..PRIOR TO "TRANSFER" TO "CMC" OF 3-27-07 ON 9-29-06 PLAINTIFF WAS "WILLFULLY ASSAULTED" BY "GUARDS BRAVO" "ARMENTA" ECT WHILE SITTING "TYPING" IN "LAW LIBRARY" AS OVER "200 PAGES OF LEGAL DOCUMENTS WILLFULLY "STOLEN""DESTROYED" BY "ARMENTA" AS WELL AS "PRESCRIPTION EYEGLASSES" AS TOOK "7 MONTHS TO "REPLACE".. "WILLFULLY SEGREGATED" FOR "108" DAYS.. "FALSELY".

(C)..ON 11-27-05 PLAINTIFF WAS "WILLFULLY SEGREGATED FOR "45""DAYS"..

BY "GUARD ESPINOZA" ON "FALSE CHARGES" ...

(D)..ON 8-9-05 PLAINTIFF "WILLFULLY SEGREGATED" AGAIN ON "FALSE" AND MISLEADING CHARGES BY "SGT CLARKE" AS USED "FALSE EVIDENCE" TO "SEGREGATE" FOR "75 DAYS" AS "VICTIM BELTON "FIRED FROM JOB ILLEGALLY" WRONGFUL BY CLARKE.

(E)..ON 10-4-06 DEFENDANT "SORIANO" WILLFULLY "WROTE FALSE" WRITE UP" ON PLAINTIFF FOR "REFUSING TO CELL" WITH ANOTHER "RACE" UNDER "OPERATIONAL PROCC-UDER" # 85..WHEN "EFFECTIVE DATE OF O.P. # 85" WAS, IS 12-1-06..AS "GUILT" FINDINGS" MEANT RELEIVING OF ALL "PERSONAL PROPERTY" UNDER "3190"..AS "ASSESSED" '60 DAYS".. OF 10-25-06. UNDER "HERNANDEZ""TILTON".. AS "3 WRITE UPS" OF 8-9-05 11-27-05 AND 9-29-06 "ALL DISMISSED" .. AS ON LAST "WRITEUP" OF '9-29-06 THE "ENT-IRE YARD" WAS "CLOSED BY "HERNANDEZ" AND "TRANSFERRED" OVER 1,000 PRISONERS..

(F)..ON 6-30-07 PLAINTIFF "BLACK CIVIL RIGHTS" "SCRAPBOOK" WAS "WILLFULLY" "DESTROYED" BY "CASTILLO" WITHOUT NOTICE" OR "CHANCE TO APPEAL"..OR "RELIEF"...

IST 5TH 8TH & 14TH

(DEFENDANTS)

8. "RIGHT" PRIVILEGE" TO "POSSESS" TV S".

1.. "SWARTHOUT" ... 2.."SISTO"..

PLAINTIFF STATE THE "RIGHT TO POSSESS TELEVISIONS" BY "LIFERS" ADA S" "RIGHT""PRIVILEGE" IS BEING DENIED BY WARDEN SWARTHOUT" BASED ON "UNCOD-ED" BUILDINGS # 19 AND #24 OF "SOLANO" WHEN THE MAIN "LIFER BUILDINGS" # 20-23 ARE 'NOT FIRE HAZARD' OR "SECURITY" VIOLATIONS ARE ADMITTED BY "SWARTHOUT" DATED 3-23-10. AS OF 4-20-10 THE STATE OF "OVERCROWDING" AS "POPULATION WISE" FORCES "100" PRISONERS PER TELEVISION WITH A "SERIOUS" AND "EXTREME RISK OF VIOLENCE". WHEN "PROPOSITION # 9" BY "BPT" AND COVERNOR SCHARZENEGGAR" MANDATES UP TO "15 YEAR DENIAL TO "LIFERS" OR "NEW" "SENTENCE" WHEN "EX POST FACTO" WHEN PLAINTIFF ARRESTED 6-6-89..WHEN "NO" "JOBS""TRADES"ECT TO OCCUPY "IDLE TIME OF PLAINTIFF PRISONERS" ECT. AS OF 4-24-10 "TELEVISIONS" "ALLOWED" "BUT" UNDER "ATTRITION" WHEN "BROKEN" ECT..
WHEN REASONS STATED BY "SISTO" SWARTHOUT" ARE "INACCURATE" "WRONG" DECEPTIVE".
WITH "RISK OF HARM" VIOLENCE". TO "CAUSE HARM" ECT. BY DISABILITIES" AND
"EXTENDED TERMS IN PRISONS" UNDER "PROP # 9". ECT. IST 5TH 8TH & 14TH..