

CHARLES B. COHLER  
111 Sutter Street  
San Francisco, California 94104  
Telephone: 434-0900

Attorney for plaintiff  
Robert Charles Jordan, Jr.

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT  
OF CALIFORNIA, SOUTHERN DIVISION

ROBERT CHARLES JORDAN, JR.,  
Plaintiff,  
vs.  
STATE OF CALIFORNIA, et al.,  
Defendants.

No. 44786.

<sup>A</sup>  
AFFIDAVIT OF DICK RAE JERRELL

STATE OF CALIFORNIA        )  
                                  )    ss.  
COUNTY OF MONTEREY        )

<sup>A</sup>  
DICK RAE JERRELL, being duly sworn, deposes and says:

1. My true name is Dick Rae Jerrell. I am currently detained at the Correctional Training Facility, Soledad, California.

2. From approximately August 24, 1965 through August 27, 1965 I was detained in a so-called "strip cell". This is the only time that I have been in a strip cell at Soledad.

3. When I was taken to the strip cell in the morning I was not permitted to wear anything at all; in the evening I was given coveralls, shorts, T-shirt and socks (the same and

1 only clothes I was given for approximately fifteen days).  
2 In the cell was a small amount of toilet paper, only one  
3 day's supply; I had no toilet paper or anything to use for  
4 toilet paper for the other four days. The only other fur-  
5 nishing of any sort in this strip cell was a thin canvas mat.

6 4. Twice a day I was given a small cup of water and  
7 occasionally the cup was refilled once at that time.

8 5. When I first came to the strip cell I pushed  
9 the accumulated waste down the commode with my hands. During  
10 the five days I was in the strip cell it was not cleaned by  
11 anyone. The flaps on the wall directly outside the bars  
12 were sometimes left open and sometimes left closed. I  
13 never made any noise or disturbance while I was in the strip  
14 cell. I never had a shower while in the strip cell.

15 6. On only one occasion while I was in the strip  
16 cell did a Medical Technical Assistant or anyone who seemed  
17 to be a Medical Technical Assistant ask how I was. That one  
18 time the MTA opened the flap, asked if I was O.K. and slammed  
19 the flap shut before I could tell him that there was some-  
20 thing I wanted.

21 If sworn as a witness I could competently testify  
22 to the above facts.

23 I declare under penalty of perjury that the foregoing  
24 is true and correct to the best of my knowledge.

25  
26  
27 Dick Rae Jerrell  
Dick Rae Jerrell

DPJ  
Lud

28 Subscribed and Sworn to before me  
29 this 11th day of June, 1966.

30 Claudia Waggoner  
NOTARY PUBLIC CLAUDIA WAGGONER  
State of California



My Commission Expires Feb. 13, 1967