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

10
11 ROBERT CHARLES JORDAN, JR.,
12 Plaintiff,
13 vs.
14 STATE OF CALIFORNIA, et al.,
15 Defendants.

No. 44786

16
17 AFFIDAVIT OF HERMAN LOUIS ALEXANDER

18 STATE OF CALIFORNIA)
19 COUNTY OF MONTEREY) ss.

20 HERMAN LOUIS ALEXANDER, being duly sworn, deposes
21 and says:

22 1. My true name is Herman Louis Alexander. I am
23 currently detained at the Correctional Training Facility,
24 Soledad, California.

25 2. From approximately June 24, 1965 through June 29,
26 1965 I was detained in a so-called strip cell. This is the
27 only time I have been in a strip cell at Soledad. When I
28 came into the strip cell there was general filth, including
29 human bodily waste all over. I asked the officer on duty
30 to clean it up and I asked him to let me have something to

1 clean it out with myself, but he didn't do either. I used
2 old paperlunch sacks which were lying on the floor to try
3 to scrape the waste on the floor into one corner by the
4 so-called commode.

5 3. During the six days I was in this strip cell
6 the flaps and door were kept closed all the time except
7 when they were opened for feeding and delivering my mail,
8 and except on one occasion when a visiting Catholic priest
9 opened the flap himself to ask how I was. I couldn't read
10 my mail in the dark and the officer closed the flaps as
11 soon as he had thrown the mail in. I felt two openings
12 for ventilation in the rear wall but I never felt anyair
13 moving in orout.

14 4. All my clothes were taken from me when I was
15 taken to the strip cell, and I was nude for all of the six
16 days. There was not even a canvas mat to sleep on, and no
17 furnishings of any kind. I tried to sleep on the old paper
18 lunch sacks. The paper lunch sacks were also the only thing
19 I could use as toilet paper. I couldn't sleep any more
20 than about two hours during the day and had to remain
21 standing almost all the time. The reason I couldn't sleep
22 and the reason I had to stand up was that the only time
23 the so-called commode was "flushed" was once a day at mid-
24 night, and the "flushing" was really flushing out into the
25 cell, not draining the commode. I couldn't keep the waste
26 shoved back far enough to let me lie down.

27 5. I was only offered water once aday in a very
28 small plastic cup, and I was never given more than one cup
29 full of water. I did not have a shower at anytime during
30 the six days I was in thisquiet cell.

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6. I only was visited by a Medical Technical Assistant one one of the six days I was in the strip cell. At that time I told him that my back hurt, but he didn't do anything about it. After I saw the Medical Technical Assistant I also asked an officer on duty if I couldn't please see the doctor. I was never visited while in the strip cell by any doctor, including the Chief Medical Officer.

7. When I was released from the strip cell I fell from weakness and dizziness.

Herman Louis Alexander
Herman Louis Alexander

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

Claudia Waggoner

NOTARY PUBLIC CLAUDIA WAGGONER
State of California



My Commission Expires Feb. 13, 1967