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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

ANAND JON ALEXANDER, Plaintiff, v. RALPH DIAZ, Secretary of CDCR, MARCUS POLLARD, Warden, Richard J. Donovan Correctional Facility, DANIEL PARAMO, former Warden, Richard J. Donovan Correctional Facility E. RAMIREZ, Correctional Officer and DOES 1-70, Inclusive and Jointly and Severally, Defendants.	CASE NO.: '20CV0100 CAB KSC COMPLAINT FOR DAMAGES; DEMAND FOR TRIAL BY JURY

COMES NOW Plaintiff ANAND JON ALEXANDER, by and through his attorney, and hereby alleges:

JURISDICTION

1. This lawsuit for money damages is brought pursuant to the provisions of 42 U.S.C. § 1983 and pendant state law claims. Federal jurisdiction is founded upon the existence of a federal question, the Civil Rights Act, 42 U.S.C. § 1983 and lies under 28 U.S.C. § 1331. The remaining causes of action arise under California state law and lie under the supplemental jurisdiction of this Court (28 U.S.C. § 167).

VENUE

2. Venue in the Southern District of California is proper because the acts or

omissions which form the basis of the claims occurred in this district.

PARTIES and RELEVANT ENTITIES

3. At all times relevant to this complaint, ANAND JON ALEXANDER ("Mr. ALEXANDER" or "Plaintiff") was a lawful permanent resident of the United States residing in San Diego County, California.

4. The California Department of Corrections and Rehabilitation (hereinafter "CDCR"), not sued herein, is and was at all material times mentioned herein a governmental agency organized under the laws and regulations of the State of California. Its headquarters are in Sacramento. CDCR operates all state correctional institutions, oversees a variety of community correctional facilities and camps, and monitors all parolees during their entry back into society.

   a. Richard J. Donovan Correctional Facility is and was at all material times mentioned one such state correctional institution. It is a state prison located on 789 acres in southern San Diego County, California, near the U.S.-Mexico border. It is operated by CDCR. It is the only state prison in San Diego County. According to RJDCF's official web page, it is "a multi-mission institution: RJDCF's primary mission is to provide housing for General Population and SNY, Level I, II, III & IV inmates serving their term of incarceration at RJDCF." "SNY, Level I, II, III & IV" are different classes of inmates, ranked according to various security criteria.

   b. CDCR Correctional Lieutenants and Sergeants are on duty at all CDCR Institutions, including RJDCF, and are assigned to all facilities. They are responsible for the safety and security of inmates, as well as the supervision of personnel below him or her in the chain of command, including sergeants, correctional officers, and other CDCR/RJDCF employees and agents who have a legal duty to appropriately supervise and protect inmates under their care, including Plaintiff. These Lieutenants and Sergeants are tasked with ensuring those people they

supervise properly perform their duties, which include conducting proper safety checks, ensuring inmate safety, ensuring proper housing of inmates and generally supervising inmates.

c. CDCR Correctional Officers are known as "floor officers" and are on-duty at all CDCR Institutions, including RJDCF, and are assigned to all facilities. They are the primary officials with whom prisoners interact. They are responsible for the safety and security of inmates and have a legal duty to appropriately supervise and protect inmates under their care, including Plaintiff. Their duties include conducting proper safety checks, ensuring inmate safety, ensuring proper housing of inmates and generally supervising inmates, including enforcing geographical restrictions. Not all Correctional Officers are "floor officers" but all "floor officers" are Correctional Officers.

d. There are also Correctional Counselors at RJDCF, who conduct classifications designed to properly designate inmates to be housed under particular conditions and in particular locations. Factors they consider include, but are not limited to, status as a prison gang dropout or member, race/ethnicity, offense of conviction, history of violence, and others. (See infra ¶¶ 20-22)

5. At all times relevant hereto, CDCR was responsible for supervising employees conduct, policies, and practices, as well as the hiring, retaining, and training of its employees and agents, including Defendants RALPH DIAZ, MARCUS POLLARD, DANIEL PARAJO, E. RAMIREZ, and DOE Defendants 1-70.

6. RALPH DIAZ, MARCUS POLLARD, DANIEL PARAJO, E. RAMIREZ and DOE Defendants 1-70 are sued in their individual capacities. At all material times, these individual Defendants held titles and participated generally as follows in this matter:

a. Defendant RALPH DIAZ ("DIAZ") was at all relevant times the Secretary

of CDCR, and highest policymaking official of CDCR, responsible for the promulgation of the policies, procedures, and allowance of the practices and customs, pursuant to which the acts of the employees of the CDCR, alleged herein, were committed. DIAZ was charged by law and was responsible for the administration of CDCR and was responsible for the supervision, training, and hiring of persons, agents, and employees working within the CDCR, including prison staff, correctional officers, correctional sergeants, correctional lieutenants, and other staff, and was responsible for the oversight, management, proper housing and classification of CDCR inmates, safety of CDCR inmates, provision of mental health and medical care services to CDCR inmates, protection of CDCR inmates, and compliance with Court orders, inter alia.

b. As of August 12, 2019, Defendant MARCUS POLLARD ("POLLARD") was at all relevant times employed by the CDCR as the Warden of Richard J. Donovan Correctional Facility in San Diego County, California ("RJDCF"). He was responsible for the proper housing and classification of RJDCF inmates, including Plaintiff and Dominic Rizzo, the RJDCF inmate who assaulted Plaintiff, was responsible for the safety and supervision of RJDCF inmates, the provision of mental health and medical care services to RJDCF inmates, and, in general, the protection of RJDCF inmates, including Plaintiff, as well as the promulgation of the policies, procedures, and allowance of the practices and customs, pursuant to which the acts of the employees of RJDCF, alleged herein, were committed. Defendant POLLARD was also charged by law and was responsible for the administration of RJDCF and was responsible for the supervision, training, and hiring of persons, agents, and employees working within RJDCF, including prison staff, correctional officers, correctional sergeants, correctional lieutenants, and other staff, and, inter

alia, mental health staff.

c. Prior to August 12, 2019, Defendant DANIEL PARAMO ("PARAMO ") was at all relevant times employed by the CDCR as the Warden of Richard J. Donovan Correctional Facility in San Diego County, California ("RJDCF"). employed by the CDCR as the Warden of Richard J. Donovan Correctional Facility in San Diego County, California ("RJDCF"). He was responsible for the proper housing and classification of RJDCF inmates, including Plaintiff and Dominic Rizzo, the RJDCF inmate who assaulted Plaintiff, was responsible for the safety and supervision of RJDCF inmates, the provision of mental health and medical care services to RJDCF inmates, and, in general, the protection of RJDCF inmates, including Plaintiff, as well as the promulgation of the policies, procedures, and allowance of the practices and customs, pursuant to which the acts of the employees of RJDCF, alleged herein, were committed. Defendant POLLARD was also charged by law and was responsible for the administration of RJDCF and was responsible for the supervision, training, and hiring of persons, agents, and employees working within RJDCF, including prison staff, correctional officers, correctional sergeants, correctional lieutenants, and other staff, and, inter alia, mental health staff.

i. On information and belief, it is highly probable that Defendant PARAMO was either present at the classification meeting when it was decided, via committee override discretion, that Rizzo would be housed on a Level III yard, as opposed to the appropriate Level IV yard, or Defendant PARAMO was notified of the decision, and failed to reverse it, in effect approving of it.

d. Defendant E. RAMIREZ at all material times, was a CDCR Correctional Officer who was on-duty in Facility D at RJDCF at the time Plaintiff was

assaulted, and was responsible or the safety and security of inmates in Facility D. He was required to properly perform his duties, including conducting safety checks, supervising inmates, and performing other tasks to ensure inmate safety, proper housing and the safety of RJDCF inmates in the facility he was in charge of, ensuring that the periodic supervision.

e. Defendants DOES 1-10 were CDCR Lieutenants and/or Sergeants that were on-duty at the time Plaintiff was assaulted. Their duties are described above in ¶ 4(b).

f. Defendants DOES 11-30 were CDCR Correctional Officers or other CDCR employees that were on duty at relevant times. Their duties are described above in ¶ 4(c).

g. Defendants DOES 31-50 were, at all materials times, responsible for the proper housing and classification of RJDCF inmates, including Plaintiff and Rizzo, and made the decision to house these inmates together. Their duties are described above in ¶ 4(d).

h. DOES 51-70 were, at all material times, responsible for providing medical care, including mental health treatment, to inmates at RJDCF, including, but not limited to, ensuring inmates, including Plaintiff, were treated, if indicated, with proper medications.

7. The true names or capacities, whether individual, corporate, associate, or otherwise, of Defendants named herein as DOES 1 through 70 are unknown to Plaintiff, who therefore sues said Defendants by said fictitious names. Plaintiff will amend this Complaint to show said Defendants' true names and capacities when the same have been ascertained. Plaintiff is informed, believes, and thereon alleges that all Defendants sued herein as DOES are in some manner responsible for the acts, omissions, and injuries alleged herein. Some of the DOE Defendants 1 through 70 may have the same identity.

8. Mr. ALEXANDER is informed and believes and therefore alleges that at all

times mentioned herein that the acts of DOES 1-70 were done under the color and pretense of the statutes, ordinances, regulations, customs and usages of the State of California. Mr. ALEXANDER is informed and believes and therefore alleges that at all times mentioned herein that DOES 1-70 were the agents, servants, and/or employees of CDCR and were, in doing the acts herein alleged, acting within the course and scope of this agency and/or employment, and with the permission, consent and authority of CDCR, and the State (not sued herein) is therefore responsible for the occurrences hereinafter alleged; and that Mr. ALEXANDER' injuries were proximately caused by the actions of Defendants.

9. Prior to the filing of this Complaint and on or about November 18, 2019,Mr. ALEXANDER filed a written claim with the State of California for the injuries alleged herein as required by, inter alia, California Government Code §§ 905, 905.2 and 945.4. On or about December 24, 2019,Mr. ALEXANDER' claims were deemed rejected as a matter of law due to the lack of a formal written denial within 45 days. The administrative claims process need not be followed as a prerequisite to bringing suit as to the claims brought under 42 U.S.C. § 1983. Patsy v. Board of Regents, 457 U.S. 496 (1982); Heath v. Cleary, 708 F.2d 1376, 1378 (9th Cir. 1983).

10. Further, Mr. ALEXANDER has complied with the provisions of the Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), to the extent required.

GENERAL ALLEGATIONS

11. ANAND JON ALEXANDER, CDCR #AB1337, is an Indian-born, American fashion designer who graduated from the Parsons School of Design and was listed in Newsweek's "Who's Next in 2007? " He has received many awards and recognitions and has been named a cultural ambassador of India for his contribution to fashion. He won the "Rising Star Award" for Fashion Week of the Americas and "Designer of the Year" at the Vancouver Fashion Week. He was a celebrity host for MTV Asia and has appeared on VH1's America's Next

Top Model with Tyra Banks and on E! with high profile muses like Ivanka Trump, Paris Hilton, and Michelle Rodriguez.

12. A few months after receiving investment capital from several Wall Street investment banks in 2007, he was arrested and indicted on sexual assault claims in Los Angeles, followed by similar filings in New York City and then Texas. In November 2008, following a jury trial in Los Angeles that has been flagged with several anomalies, there was a mixed verdict (guilty, not guilty, and hung)[1].

13. Although the evidence showed there were "no assault related findings," as evidenced by the lack of physical injuries on anyone, and he had no history of violence, drugs, or gangs, the trial court sentenced him to 14 years plus 45 years to life in prison. The conviction was upheld on appeal (*People v. Alexander,* 2012 Cal. App. Unpub. LEXIS 4547 (2012).

14. Mr. ALEXANDER initiated the Interstate Agreement on Detainers and favorably resolved his New York and Texas based charges by May of 2018. Based on these favorable changes of circumstances, alongside evidence that was mostly previously withheld and or newly discovered, a Writ of Habeas Corpus is currently pending in the Central District of California (USDC Case No. CV 13-09302-DDP (GJS)).

15. There has been a ground swell of public support as his legal proceedings have

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[1] Of the initial 59 counts, 37 were dismissed before trial. The guilty verdicts included seven counts of committing a lewd act on a child (CA Pen. Code, §288(c)(1)), contributing to the delinquency of a minor (§272(a)(1)), sexual battery by restraint (§243.4(a)), attempted forcible oral copulation (§§288a(c)(2), 664), forcible rape (§261(a)(2)), two counts of sexual penetration by a foreign object (§ 289(a)(1)), using a [17 year old] minor for sex acts (§311.4(c)), [and the same 17 year old] for possession of child pornography (§ 311.11(a)), and misdemeanor sexual battery (§243.4 (e)(1)). The jury found he committed crimes against multiple victims within the meaning of §667.61, subsection (b). He was acquitted of multiple similar counts.

received national and international media coverage[2]. While in custody, Mr. ALEXANDER has been actively involved in positive programming, has acknowledged the existence of blurred lines between his personal and professional relationships, has recognized the immoral lifestyle he was part of in the fashion industry. Nevertheless he holds steadfast to his innocence. He has been a model prisoner and recognized for his commitment towards rehabilitation.

16. Initial CDCR Housing Reviews reflect that he is Race Eligible (RE) and may be housed with another inmate of any race. He has no escape history. He has never been involved in an incident that was race related. He has no non-confidential offender separation concerns. He has no enemy/safety concerns. He has no history of aggression towards staff or other inmates. He has no history of in-cell assaultive behavior and no history of incarcerated sexual assault. He claims no affiliation with any gangs. He was designated as a Sensitive Needs Yard (SNY) inmate.

17. He reported to CDCR on 10/9/09 and was housed at North Kern State Prison Reception Yard. He was received as a Level III inmate. He was extradited to New York City and housed in Rikers Island in January of 2010. Upon the resolution of his New York cases, on June 11, 2013 he transferred to the California Correctional Institution (CCI) as a Level III inmate. In 2014, he was transferred from CCI as a level III inmate to RJ Donovan as a Level III inmate.

18. In August 23, 2018, over a month ahead of his scheduled annual committee, Mr. ALEXANDER had a classification review hearing where he was told the decision was to reclassify him as a Level II inmate.

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[2] See e.g. www.davisvanguard.org/2019/10/analysis-was-wrongfully-convicted-fashion-designer-victim-of-racial-prejudice-on-the-part-of-the-prosecutor/ (attached hereto)

19. From his arrival at CCI through May 19, 2019 (while at RJ Donovan), he was housed in a sensitive needs yard. He was housed at RJ Donovan D yard until May 30, 2019, when he was transferred to general population and moved to E Yard.

20. According to CDCR policies, Article 46 - Inmate Housing Assignments, No. 54046.1: "… All [Inmate Housing Assignments ("IHAs")] shall be made on the basis of available information, individual case factors, and objective criteria necessary to assign appropriate housing for all inmates. The IHA policy will ensure housing practices are made consistent with the safety, security, and treatment of the inmate, as well as the safety and security of the public, staff, and institutions."

21. According to CDCR policies, Article 46 - Inmate Housing Assignments, No. 54046.3: "The Warden/Administrator of the institution/facility shall be responsible for maximizing proper bed utilization, ensuring inmates are appropriately housed at the institution, implementing departmental policy in accordance with prison design and institution safety and security. Staff must use correctional experience and training, correctional awareness, and a sense of correctional reasonableness to determine suitability for dormitory, celled, and single-celled housing."

22. According to CDCR policies, Article 46 - Inmate Housing Assignments, No. 54046.4: "All staff involved in the review and approval of an inmate's housing assignment must be cognizant of all available factors to be considered prior to determining an inmate housing assignment." Factors considered include, but are not limited to:

    a. Length of sentence.

    b. Enemies and victimization history.

    c. Criminal influence demonstrated over other inmates.

    d. Vulnerability of the inmate due to medical, mental health, and disabilities.

e. Reason(s) for segregation.

f. History of "S" suffix determination.

g. History of in-cell assaults and/or violence.

h. Prison gang or disruptive group affiliation and/or association.

i. Nature of commitment offense.

23. This lawsuit stems from an event which occurred on May 18, 2019. On that date, in D Yard, he was the victim of a grievous assault perpetrated by another inmate. It was likely a racially motivated hate crime. The attack caused grave bodily injuries, including multiple stab wounds to his face and right eye (requiring over a dozen stitches at the upper orbital)[3], five facial fractures, a lower orbital floor blowout, sinus and nasal fractures, a deviated septum, a 50% abrasion of the right cornea, long term impairment of his vision and respiration, serious nerve damage, PTSD, psychological collateral damage, ongoing therapy, work, and education restriction. At least two serious surgeries have been recommended by medical experts and they presently cannot rule out permanent damage.

24. Mr. ALEXANDER, a "first tier" resident, was waiting by the telephones to call his mother for her 70th birthday (May 18, 2019) when a Level IV inmate named Dominic Rizzo[4], CDCR #V04967[5], a "second tier" inmate, somehow managed

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[3] See Exhibit 1.

[4] He was convicted of murder, attempted murder, and street terrorism, and it was found to be true that the conspiracy to commit murder and attempted murder offenses were committed for the benefit of a criminal street gang, and the attempted murder offense was committed with willful premeditation and deliberation. The trial court sentenced Rizzo to 25 years to life. See *People v. Rizzo* (Apr. 8, 2005, G032981) ___Cal.App.4th___ [2005 Cal. App. Unpub. LEXIS 3225].

[5] A correctional officer (not sued herein) advised Plaintiff that Rizzo was "a beast" and stated "I don't know why he is on my yard." This correctional

to/or was allowed to sneak up on Mr. ALEXANDER from behind and stab Mr. ALEXANDER multiple times in the face. While bloodied and blacked out on the floor, Mr. ALEXANDER was kicked and beaten. This attack on Mr. ALEXANDER was nothing less than an attempted murder committed by Rizzo. Dayroom access at every CDCR cell institution alternates day room activity such that first and second tier inmates would not be allowed to come into physicial contact with each other. This is for inmate control, officer safety and the protection of both.

25. It was followed by a subsequent death threat on May 25th by Justin Simons CDCR #AK5535, Rizzo's accomplice. 4 days after a compatibility chrono was filed based upon the assault, Simons told Plaintiff "Don't mess with my pops. You had better plead guilty (to the RVR) or your eye will be the least of your problems. Do you know how many people we have taken out on this yard?" When Plaintiff expressed that he had no idea who Simons was referring to (having not ever met or even seen Rizzo up to this point) Simons said "Rizzo is my pops. We are more related than family. Both Rizzo and Simons are known white supremacists[6].

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officer stated he was going to write a Confidential Information Memorandum to Rizzo's file on the grounds that Rizzo was a Level IV with a history of violence. A correctional sergeant (not sued herein) thereafter intervened and advised Plaintiff that a 115 Rules Violation Report had been authored and was pending. That same sergeant advised Plaintiff to delay the hearing and demand the reporting officer testify. That same sergeant also advised Plaintiff that "you are safer here, but if convicted you will stay at a level III yard." Other correctional officers (not sued herein) subsequently told Plaintiff that Rizzo had admitted to the 115 Rules Violation Report and expressed surprise that Plaintiff wasn't leading guilty also. None of this documentation has been produced.

[6] See *People v. Jeffries* (Apr. 8, 2010, No. G042058) ___Cal.App.4th___ [2010 Cal. App. Unpub. LEXIS 2555], wherein Mr. Rizzo testified under

26. Plaintiff told a correctional officer (not sued herein) about the threat. He advised Plaintiff's options were: (1) go to the hole and nothing happens to Rizzo or Simons; (2) lose and get sent to a Level III yard elsewhere; or (3) win and go to a Level II yard. That correctional officer suggested Plaintiff prepare for the hearing. A few days later, specifically May 29, 2019, Simons was banging on Plaintiff's cell door. He displayed a shank, called Plaintiff a motherfucker, and said "I'm going to get you, there is a green light." Plaintiff reported the threat and on information and belief both Simons and Rizzo's cells were searched. For

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a grant of immunity that he "ran" Public Enemy Number 1 (PENI) in 2006. According to the Anti-Defamation League, PENI is an unusual hybrid of a racist skinhead gang, street gang and prison gang. Since the early 2000s, the group has grown considerably, particularly in California, where it originated, and has also spread to nearby states. PENI's increasing strength stems to a large degree from its ability to position itself as a white power criminal organization capable of operating both on the streets and in the prison yards as foot soldiers for older, more established white supremacist prison gangs, such as the Aryan Brotherhood...The group has also raised its profile in the California prison system, where incarcerated members attempt to gain more recruits and influence. PENI's increasing strength stems to a large degree from its ability to position itself as a white power criminal organization capable of operating both on the streets and in the prison yards as foot soldiers for older, more established white supremacist prison gangs, such as the Aryan Brotherhood....a regular inmate can only be sentenced to a SHU if he is a threat to institutional security or has been rigorously proven to be an associate of a prison gang (Donald Mazza, Nick Rizzo and Devlin Stringfellow, three top PENI were all given SHU sentences in this way). PENI members play an important role in California's prison gang structure, thanks in large part to the Aryan Brotherhood." see www.adl.org/education/resources/profiles/public-enemy-number-one.html

16 members of the Aryan Brotherhood were recently indicted. www.justice.gov/usao-edca/pr/aryan-brotherhood-members-and-associates-charged-racketeering-directing-murders-and

his protection, Plaintiff was locked in his cell. No required written record of a cell lock was provided to Plaintiff as he requested.

27. CDCR and the Defendants failed to protect Mr. ALEXANDER, by knowingly allowing a known violent Level IV assailant to be housed with, and have open access to, Mr. ALEXANDER, a Level II low risk inmate with no history of violence classified as a sensitive needs inmate. At no time should these two inmates have been on the same yard, much less the same floor, at the same time.

28. Further, the staff at RJ Donovan have attempted to cover up the incident in several ways, going so far as to try and incriminate Mr. ALEXANDER, the only actual victim.

a. No criminal referral pursuant to 15 CCR § 3316 has been made to local prosecuting authorities even though the stabbing and vicious beating of Mr. ALEXANDER prima facie qualifies as an "attempted murder"; "assault with a deadly weapon" and the infliction of "great bodily injury." On information and belief, RJDCF has a voluminous of history of District Attorney referrals for far less serious incidents, including Plaintiff's cellmate, who was assaulted without any weapons.

b. Despite the seriousness of the attack and Mr. ALEXANDER's injuries, it took over 10 days after the incident before Mr. ALEXANDER was transferred to an appropriate sensitive needs lower yard. Mr. ALEXANDER had been previously endorsed to a lower level yard and had been actively perusing this transfer was supposed to have been transferred as far back as September 2018. Any excuse of lack of "bed space" to have moved him to a lower yard sooner or that right after being stabbed, blinded and under serious medication. Mr. ALEXANDER allegedly signed some "marriage chrono" will be shown as unavailing.

c. Defendant RAMIREZ, the reporting CDCR Corrections Officer, prepared a false Rules Violation Report relating that the assault was no more than

"fighting" (i.e. mutual Combat) and reported no serious injuries with respect to Mr. ALEXANDER. Medical records clearly show otherwise7. Rizzo suffered no injuries and, as noted above, went on to plead guilty to a rules violation[8].

29. The institution failed (or refused) to transfer Mr. ALEXANDER to a lower-level yard as recommended because they told them it was be contingent on the outcome of the RVR hearing (based on the false report of "fighting"). A true finding (i.e. guilty verdict) would have the effect of raising his points and make him ineligible for such a transfer. Mr. ALEXANDER was given a hearing on May 30, 2019, where the Rules Violation Report was dismissed at the last moment[9]. He was then transferred out to lower level II (E Yard) within the same hour. This clearly indicates an attempt to avoid having the reporting officer answer difficult questions under penalty of perjury and to keep the incident under wraps.

30. It took over 7 months of administrative appeals to obtain the above referenced incident report and to have those involved in the stabbing/assault or death threats

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[7] See attached photograph of injuries.

[8] On information and belief, even after pleading guilty to this assault, Rizzo (a Level IV "override") was allowed to stay on the yard for at least another three months where he went on to assault other inmates.

[9] On May 30, a correctional sergeant (not sued herein) advised Plaintiff that his hearing was "right now" but im I'm go delay it until Lt. Ortiz comes onto duty next shift." It was Plaintiff's impression that Lt. Ortiz was more fair than the on duty lieutenant. Plaintiff was held in the gym until the hearing was to start. Presented with a photo lineup, Plaintiff identified himself and Simons. Plaintiff was told that "the hearing is just a formality, just dont call the officer (Defendant RAMIREZ) to testify and we are going to move you out of here." He was taken straight from the gym to E yard, where he remains today. This was when he learned that the officer who saw the assault/attempted murder was about 72 feet away.

placed on Mr. ALEXANDER's "enemy list.[10]" The basis of the "RVR hearing" dismissal has not been provided to date despite a request.

31. Furthermore, the institution dragged out Mr. ALEXANDER's request for a second opinion on surgery to such a point that, the delay made it impossible to go ahead with the recommended surgeries due to the time lapse. This has resulted in potential additional risks. His double vision and nerve damage are projected to be long-lasting, if not permanent, and has already compromised his day-to-day activities including his rehabilitation efforts, educational and vocational programs. Further, the institution failed to treat a deviated septum.. On a similar note, despite going through the 602 process, the institution has not cleared access to dental surgery[11]. Further despite a medical chrono requiring complete rest or light duty, Plaintiff was put on heavy duty, to start at 5 am. However, as a result of administrative appeals, this assignment was excused.

32. To its credit, the mental health department seems to be the only part of the institution that has reasonably assisted and documented of Mr. ALEXANDER's extraordinary suffering, PTSD, and other cruel and unusual punishment. He lives

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[10] Once at E yard, Plaintiff began making inquiries of new arrivals to try to get information. Inmate John Boland (CDCR AR8194) told Plaintiff that Rizzo had assaulted 2 other people in a race related incident on D Yard. In retaliation, a Samoan inmate allegedly stabbed Rizzo and therefore Rizzo was moved for his safety. In E yard, Plaintiff was sexually harrassed by his cellmate, who was thereafter evicted from the cell based upon a prior history. None of these events has apparently been documented either.

[11] CDCR currently limits root canals to only the first six front teeth while Mr. ALEXANDER requires two root canals towards his back teeth. These teeth are quite close to his injuries and an infection of his rear teeth could prove devastating. Plaintiff was given the option to pay for an outside dentist to perform this needed surgery. The Institution has refused to accommodate him.

in constant fear, not just from safety concerns of being targeted as a minority in any of the California prisons, but due to the deliberate indifference, subsequent cover up, and betrayal of the custody and care his life to which the prison was entrusted.

33. The CDCR's actions in allowing the attack to occur, followed by a brazen attempt to cover up, shows an overt deliberate indifference. Separately, their failure to provide necessary ongoing medical treatment constitutes further deliberate indifference to Mr. ALEXANDER's safety and welfare. The harm is extraordinary.

34. In sum, the institution failed to (1) follow its own rules, (2) keep necessary documentation of the event, and (3) initiate a referral to the District Attorney for consideration of formal charges against the assailant. Mr. ALEXANDER continues to have an exemplary in-custody record of successfully participating in rehabilitation programs with zero indication or incidents of violence.

FIRST CLAIM FOR RELIEF
42 U.S.C. § 1983
(FAILURE TO PROTECT INMATE FROM HARM
[Against All Defendants]

35. Mr. ALEXANDER incorporates by reference and realleges paragraph 1-34 of this complaint.

36. By the actions and omissions described above, Defendants, and each of them, acting under the color of state law in their individual capacities, deprived Mr. ALEXANDER of the right to have his safety and life protected while in the custody of the State of California as secured by the Eighth Amendment, by subjecting him, or through their deliberate indifference, allowing others to subject him, to a deprivation of these rights to be protected.

a. "[W]hen the State takes a person into its custody and holds him there against his will, the Constitution imposes upon it a corresponding duty to assume some responsibility for his safety and general well-being."

DeShaney v. Winnebago Cty. Dep't of Soc. Servs., 489 U.S. 189, 199-200 (1989). Indeed, detainees in jails and prisons are "restricted in their ability to fend for themselves" and are, therefore, far more vulnerable than the general population. See *Hare v. City of Corinth*, 74 F.3d 633, 639 (5th Cir. 1996). It is long settled that "prison officials have a duty . . . to protect prisoners from violence at the hands of other prisoners" because corrections officers have "stripped [the inmates] of virtually every means of self-protection and foreclosed their access to outside aid." *Farmer v. Brennan*, 511 U.S. 825, 833 (1994) (internal quotation marks omitted). The risk of inmate-on-inmate violence in the prison setting - especially in a level IV facility - is well known. Prison officials, lieutenants, sergeants, and correctional officers are not permitted to "bury their heads in the sand" and ignore these obvious risks to the inmate populations that they have an affirmative duty to protect. See *Walton v. Dawson*, 752 F.3d 1109, 1119 (8th Cir. 2014)

37. The listed Defendants knew or had reason to know that housing Mr. ALEXANDER with a violent inmate like Rizzo, who posed a substantial risk of serious harm to Mr. ALEXANDER, in view of the multitude of factors as described above.

38. At the time Mr. ALEXANDER was attacked by Rizzo, Defendants RAMIREZ and DOES 11-30 were the floor officers that were responsible for conducting proper cell checks, supervising inmates, and were responsible for protecting inmates from inmate-on-inmate violence.

39. By the actions and omissions described above, the individually named Defendants violated 42 U.S.C. § 1983, depriving Plaintiff of the following well-settled constitutional right(s) that are protected by the First and Eighth Amendments to the U.S. Constitution:

a. The right to be protected from violence at the hands of other prisoners

while in custody and confined in a state prison, as well as the right to one's liberty in bodily integrity, as secured by the Eighth Amendment;

b. The listed Defendants' failure to intervene, prevent, or stop the constitutional violations by others, when Defendants were in a position to so intervene when such violations were occurring, also renders such Defendant(s) liable for these violations.

40. The above acts and omissions, while carried out under color of law, have no justification or excuse in law, and instead constitute a gross abuse of governmental authority and power, shock the conscience, are fundamentally unfair, arbitrary and oppressive, and unrelated to any activity in which governmental officers may appropriately and legally undertake in the course of protecting persons or property, or ensuring civil order. The above acts and omissions were consciously chosen from among various alternatives.

41. Defendants subjected Plaintiff to their wrongful conduct, depriving Plaintiff of the rights described herein, knowingly, maliciously, and with conscious and reckless disregard for whether the rights and safety of Plaintiff and others would be violated by their acts and/or omissions.

42. As a direct and proximate result of the foregoing unconstitutional actions, omissions, practices, and/or procedures of Defendants, and each of them, Plaintiff sustained injuries and damages, as set forth above. Plaintiff is therefore entitled to general and compensatory damages in an amount to be proven at trial.

43. In committing the acts alleged above, the individually named Defendants acted maliciously and/or were guilty of a wanton and reckless disregard for the rights, safety, and emotional well-being of Plaintiff, and by reason thereof, Plaintiff is entitled to punitive damages and penalties allowable under 42 U.S.C. § 1983 and other state and federal law against these individual Defendants in an amount according to proof at the time of trial in order to deter the defendants from engaging in similar conduct and to make an example by way of monetary

punishment.

44. Plaintiff is also entitled to reasonable costs and attorney's fees under 42 U.S.C. § 1988.

SECOND CLAIM FOR RELIEF
42 U.S.C. § 1983
SUPERVISORY LIABILITY
[Against Defendants DIAZ, POLLARD, PARAJO and DOES 1-10 Only]

45. Mr. ALEXANDER incorporates by reference and realleges paragraph 1-34 of this complaint.

46. As supervisors, Defendants DIAZ, POLLARD, PARAJO and DOES 1-10, and each of them, permitted and failed to prevent the unconstitutional acts of other Defendants and individuals under their supervision and control, and failed to properly supervise such individuals, with deliberate indifference to the rights of Mr. ALEXANDER. Each of these supervising Defendants either directed his or her subordinates in conduct that violated Plaintiff's rights, OR set in motion a series of acts and omissions by his or her subordinates that the supervisor knew or reasonably should have known would deprive Plaintiff of rights, OR knew his or her subordinates were engaging in acts likely to deprive Mr. ALEXANDER of rights and failed to act to prevent his or her subordinate from engaging in such conduct, OR disregarded the consequence of a known or obvious training deficiency that he or she must have known would cause subordinates to violate Plaintiff's rights, and in fact did cause the violation of Mr. ALEXANDER's rights.

47. Furthermore, each of these supervising Defendants is liable in their failures to intervene in their subordinates' apparent violations of Plaintiffs' rights.

48. As a direct and proximate result of the foregoing unconstitutional actions, omissions, practices, and/or procedures of Defendants DIAZ, POLLARD, PARAJO and DOES 1-10, Plaintiff sustained injuries and damages, as set forth above. Plaintiff is therefore entitled to general and compensatory damages in an

amount to be proven at trial.

49. In committing the acts alleged above, Defendants DIAZ, POLLARD, PARAJO and DOES 1-10, acted maliciously and/or were guilty of a wanton and reckless disregard for the rights, safety, and emotional well-being of Plaintiff, and by reason thereof, Plaintiff is entitled to punitive damages and penalties allowable under 42 U.S.C. § 1983 and other state and federal law against Defendants in an amount according to proof at the time of trial in order to deter the defendants from engaging in similar conduct and to make an example by way of monetary punishment.

50. Plaintiff is also entitled to reasonable costs and attorney's fees under 42 U.S.C. § 1988.

THIRD CLAIM FOR RELIEF
42 U.S.C. § 1983
DELIBERATE INDIFFERENCE TO MEDICAL CONDITION
[Against All Defendants]

51. Mr. ALEXANDER incorporates by reference and realleges paragraph 1-34 of this complaint.

52. In doing the acts alleged herein, Defendants, and each of them, breached their duty under the Eighth Amendment to the U.S. Constitution to refrain from deliberate indifference to Mr. ALEXANDER's medical condition, meaning in this case they were required to ensure that Mr. ALEXANDER, who was in their custody, was provided with appropriate medical treatment for severe, life threatening injuries.

53. Mr. ALEXANDER evidenced a serious medical need, and failure to treat his condition by providing root canal surgery would result in further significant injury or the unnecessary and wanton infliction of pain. Defendants were deliberately indifferent through their purposeful act or failure to respond to his medical need and the delay led to further unnecessary pain, discomfort and injury.

54. As a direct and proximate result of the foregoing unconstitutional actions, omissions, practices, and/or procedures of Defendants, and each of them, Plaintiff sustained injuries and damages, as set forth above. Plaintiff is therefore entitled to general and compensatory damages in an amount to be proven at trial.

55. In committing the acts alleged above, Defendants, and each of them, acted maliciously and/or were guilty of a wanton and reckless disregard for the rights, safety, and emotional well-being of Plaintiff, and by reason thereof, Plaintiff is entitled to punitive damages and penalties allowable under 42 U.S.C. § 1983 and other state and federal law against Defendants in an amount according to proof at the time of trial in order to deter the defendants from engaging in similar conduct and to make an example by way of monetary punishment.

56. Plaintiff is also entitled to reasonable costs and attorney's fees under 42 U.S.C. § 1988.

FOURTH CLAIM FOR RELIEF
VIOLATION OF CIVIL CODE § 52.1(b)
[Against All Defendants]

57. Mr. ALEXANDER incorporates by reference and realleges paragraph 1-34 of this complaint.

58. By their acts, omissions, customs, and policies, Defendants, and each of them, acting in concert/conspiracy, as described above, and with threat, intimidation, and/or coercion, violated Plaintiff's rights under California Civil Code § 52.1 and the following clearly established rights under the United States Constitution and California Constitution and law:

a. Plaintiff's right to be free from deliberate indifference to Mr. ALEXANDER's safety needs while in CDCR custody as an inmate, as secured by the Eighth Amendment to the United States Constitution and the California Constitution, Article 1, Section 7;

b. The right to enjoy and defend life and liberty; acquire, possess, and protect

property; and pursue and obtain safety, happiness, and privacy, as secured by the California Constitution, Article 1, Section 1; and

c. The right to protection from bodily restraint, harm, or personal insult, as secured by California Civil Code § 43.

59. Separate from, and above and beyond, Defendants' attempted interference, interference with, and violation of Plaintiff's rights, Defendants violated Plaintiff's rights by the following conduct, among other conduct, constituting threat, intimidation, or coercion:

a. Intentionally and/or with deliberate indifference, failing to protect Mr. ALEXANDER from violence; and/or

b. Intentionally and/or with deliberate indifference, failing to provide appropriate medical care, thereby subjecting Mr. ALEXANDER to needless and severe suffering; and/or

c. Failing to protect Mr. ALEXANDER from physical harm from gang members, including a fear of an imminent risk of injury or death.

60. As a direct and proximate result of the foregoing unconstitutional actions, omissions, practices, and/or procedures of Defendants, Plaintiff sustained injuries and damages, as set forth above. Plaintiff is therefore entitled to general and compensatory damages in an amount to be proven at trial.

61. In committing the acts alleged above, Defendants acted maliciously and/or were guilty of a wanton and reckless disregard for the rights, safety, and emotional well-being of Plaintiff, and by reason thereof, Plaintiff is entitled to punitive damages and penalties allowable under 42 U.S.C. § 1983 and other state and federal law against Defendants in an amount according to proof at the time of trial in order to deter the defendants from engaging in similar conduct and to make an example by way of monetary punishment.

62. Plaintiff is also entitled to reasonable costs and attorney's fees under Civil Code § 52.1.

FIFTH CLAIM FOR RELIEF
Negligence
[Against All Defendants]

63. Mr. ALEXANDER incorporates by reference and realleges paragraph 1-34 of this complaint.

64. Defendants were negligent in regards to Mr. ALEXANDER's health, safety and welfare, and breached that duty of care.

65. Defendants breached their mandatory duties to act with due care in the execution and enforcement of any right, law, or legal obligation.

66. At all material times, each Defendant owed Mr. ALEXANDER the duty to act with reasonable care. These general duties of reasonable care and due care owed to Mr. ALEXANDER by all Defendants include, but are not limited, to the following specific obligations:

a. To provide safe and appropriate CDCR custody for Mr. ALEXANDER, including reasonable classification, monitoring, and housing, and ensuring proper cell checks, supervision, and monitoring;

b. To obey federal law, Supreme Court and Ninth Circuit precedent, and Court Orders for the care and safety of inmates, such as Mr. ALEXANDER;

c. To use generally accepted prison, custodial, institutional, law enforcement, and other inmate-safety-ensuring procedures that are reasonable and appropriate for Plaintiff's status and history as a CDCR inmate;

d. To prevent prisoners from engaging in and participating in illegal activities which can precipitate inmate-on-inmate violence;

e. To refrain from abusing their authority granted to them by law; and,

f. To refrain from violating Plaintiffs' rights guaranteed by the United States and California Constitutions, as set forth above, and as otherwise protected by law.

67. As a direct and proximate result of the foregoing unconstitutional actions, omissions, practices, and/or procedures of Defendants, Plaintiff sustained injuries and damages, as set forth above. Plaintiff is therefore entitled to general and compensatory damages in an amount to be proven at trial.

68. Plaintiff is also entitled to reasonable costs and attorney's fees under applicable law.

SIXTH CLAIM FOR RELIEF
GOVERNMENT CODE § 845.6
FAILURE TO SUMMON OR PROVIDE
IMMEDIATELY NECESSARY MEDICAL CARE
[Against All Defendants]

69. Mr. ALEXANDER incorporates by reference and realleges paragraph 1-34 of this complaint.

70. In doing the acts alleged herein, Defendants and each of them, breached their duty of care to Mr. ALEXANDER to summon/provide medical care. Said duty of care arose under, inter alia, Penal Code § 2652-2653 and California Government Code § 845.6.) Specifically, the Defendants are liable under California Government Code § 845.6 because they knew, or had reason to know that Mr. ALEXANDER was in need of immediate medical care and they failed to take reasonable action to summon or provide such medical care.

71. The State of California, by and through Defendant CDCR, is vicariously liable, pursuant to California Government Code § 815.2.

72. As a direct and proximate result of the foregoing unconstitutional actions, omissions, practices, and/or procedures of Defendants, Plaintiff sustained injuries and damages, as set forth above. Plaintiff is therefore entitled to general and compensatory damages in an amount to be proven at trial.

73. In committing the acts alleged above, Defendants acted maliciously and/or were guilty of a wanton and reckless disregard for the rights, safety, and emotional well-being of Plaintiff, and by reason thereof, Plaintiff is entitled to punitive damages against Defendants in an amount according to proof at the time of trial

in order to deter the defendants from engaging in similar conduct and to make an example by way of monetary punishment.

74. Plaintiff is also entitled to reasonable costs and attorney's fees under applicable law.

PRAYER FOR RELIEF

WHEREFORE, Mr. ALEXANDER prays for judgment against as follows against each and every Defendant herein, jointly and severally:

1. For general and compensatory damages against Defendants and each of them according to proof, which is fair, just, and reasonable;
2. For exemplary and punitive damages under 42 U.S.C. § 1983, federal law, and California law, in an amount according to proof and which is fair, just, and reasonable against all Defendants;
3. All other damages, penalties, costs, interest, and attorneys' fees as allowed by, inter alia, 42 U.S.C. §§ 1983 and 1988; California Civil Code §§ 52 et seq., 52.1
4. For such other and further relief as the Court deems proper, including but not limited to Declaratory Relief if appropriate.

DEMAND FOR JURY TRIAL

Mr. ALEXANDER hereby demands a jury trial on all causes of action.

Respectfully Submitted,

Dated: January 14, 2020

s/ Keith H. Rutman
KEITH H. RUTMAN
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Analysis: Was Wrongfully Convicted Fashion Designer a Victim of Racial Prejudice on the Part of Prosecutor?

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In 2008, Anand Jon Alexander, a rising star in the fashion design world, was convicted of multiple counts of sexual assault and received a life sentence in prison. He is widely believed to have been wrongfully convicted of these crimes.

As his petition for commutation filed by his attorneys notes, "Mr. Alexander's tainted trial and unreliable verdict and subsequently disproportionate prison sentence has resulted in a travesty of justice."

Jeffrey Deskovic, himself an exoneree and head of the Jeffrey Deskovic Foundation, told the Vanguard, "Anand Jon's case is fraught with prosecutorial misconduct and bad lawyering. It is no wonder he was wrongfully convicted."

In a letter, Mr. Deskovic, who will be the Vanguard's keynote speaker in a few weeks (http://progressive-prosecution.eventbrite.com), added, "I have never seen a wrongful conviction case as broad and complex as this one. It's absolutely stunning!"

Similarly, having reviewed the evidence of factual innocence that was withheld by the police for over a decade, Exoneree Obie Anthony, founder of Exoneratednation.org, and former California Assemblywoman Patty Lopez, the author of Assembly Bill 1909, described the injustice against Anand Jon Alexander as "one of the worst cases of police misconduct…utterly shocking…poster boy victim of 1909 violations."

Corey Parker, Counsel for American Justice Alliance, argues in his amicus curiae brief, "Unless this Court rectifies this wrongful conviction, minority groups and individuals in the State of California will live in fear of being subject to such similar state-sponsored discrimination and underhanded, unconstitutional tactics by the very law enforcement tasked with protecting them."

Appellate Attorney Julia Anna Trant adds, "I am convinced that Mr. Alexander's conviction is one of the worst miscarriages of justice I have ever encountered in my work as a legal professional. While working on Mr. Alexander's case, I could not stop being astounded by the amount of violations of Mr. Alexander's constitutional rights, the rules of criminal procedure, and the rules of evidence."

While there are a number of complaints, including jury misconduct, Brady violations and police misconduct, a lesser-known but serious problem with his trial was the subtle but overt and egregious (https://visitor.r20.constantcontact.com/d.jsp?llr=dfdf98bab&p=oi&m=1101518769315&sit=99enzcbcb&f=64669ab4-a397-4800-9775-08e36bfe25c9)appeal to racial and religious prejudice.

In pretrial motions, the defense was able to get the judge to keep race and religion out of the case. However, they kept coming back in.

For instance, in a debate over whether a book would be admitted into evidence, the defense argued that "the court already said we're keeping religion out of this case."

During voir dire, Deputy DA Young noted, "I thought earlier when the court ruled we wouldn't delve into religion, it wouldn't touch on that area, so I didn't object to it originally, but I thought it got into the moral, religious, spiritual areas we were trying to stay from."

The judge noted, "I'm not going to permit it," and later clarified, "No, it's out, I'm not going to allow it."

However, despite the court's admonishment, Ms. Young on behalf of the state was able to get racial issues before the jury during her closing arguments.

Mr. Parker writes, "Mr. Alexander's conviction has been tainted by myriad due process violations and inescapable prejudice. The role that race, religion, and national origin played in his conviction has shaken the belief of Amici that South Asians, Middle Easterners, and other minorities can receive equal protection under the laws of this state."

We can see these appeals in the transcript of Deputy DA Frances Young's rebuttal closing arguments. The alleged victims are 19 girls – who are white.

Ms. Young sets the scene, noting that all of the girls described the same scene – an assault on a "cruddy air mattress… with dirty sheets, dirty towels, smelly t-shirts."

She argued, "You know that Ferrari T-shirt that the clerk has. I don't know if you want to do that, take a whiff of it. It's not pleasant. It corroborates exactly what they said. He smelled. His apartment was disgusting."

Later she added, "They all told you he smelled."

As Mr. Parker points out, this is not an accident. He writes, "Mr. Alexander was a filthy outsider to the community, a 'dirty' and 'smelly' 'Hindu from India,' who read foreign Hebrew symbols 'from right to left'…"

Mr. Alexander, from India, also has a Jewish background.

Mr. Parker argued, "The gratuitous remarks made in Mr. Alexander's case served no purpose other than to 'inflame and prejudice the minds of the jurors against the defendant because he happened to be a [South Asian immigrant].'"

But perhaps more egregious, Ms. Young played on racial stereotypes as well.

She noted in her rebuttal, "Being a minority, I noticed that they were all white."

She was able to work in the reference subtly, despite official judicial admonishment not to bring race into the equation.

Here the DA uses that longtime racial dog whistle, the fear of the white jurors that innocent, young, white girls or women will become the victims of a predatory person of color.

Mr. Parker argues, "Insinuating that a minority defendant preys upon white women is a highly inflammatory tactic that has been consistently treated as prosecutorial misconduct warranting relief."

He notes that Florida's high court reversed a death sentence because the prosecutor's inquiry into the race of past victims was a "deliberate attempt to insinuate that appellant had a habit of preying on white women."

Previously, courts found this to be a prejudicial error in a case where the prosecution argued that the black defendant told the white victim "something about white people having been taking advantage of the colored people and, of course, he wanted to get even with the white people."

Argues Mr. Parker, "Statistics have shown decisively that a victim's race can powerfully sway a jury, even to the extent that the race of a victim can play a dispositive role in whether a defendant lives or dies."

Mr. Parker adds, "After portraying Mr. Alexander as a mystical and smelly foreigner, the prosecution maximized the prejudicial impact by presenting a contrast with the whiteness of the alleged victims. Beyond merely insinuating that Mr. Alexander had a preference for white women, the prosecution directly told the jury that he preyed specifically and exclusively on white women. This tactic presents a clear case of misconduct, and its prejudicial impact cannot reasonably be questioned."

In a recent Supreme Court case, the court ruled, in reviewing the history of the state of Mississippi's peremptory strikes in the Flowers case, that evidence "strongly supports the conclusion that the State's use of peremptory strikes in Flowers' sixth trial was motivated in substantial part by discriminatory intent."

Indeed, the state attempted to strike all 36 black prospective jurors over the court of the first four trials – Curtis Flowers has been tried six separate times for his alleged role in the murder of four employees of a Mississippi furniture store.

Mr. Flowers is black; three of the four victims were white. The US Supreme Court ultimately found that the trial court "committed clear error in concluding that the State's peremptory strike of black prospective juror Carolyn Wright was not motivated in substantial part by discriminatory intent."

In this case, the prosecutor has improperly injected race into a trial, as Mr. Parker argues. This would tend to "undermine [the courts'] strong commitment to rooting out bias, no matter how subtle, indirect or veiled."

As Patty Lopez, a former California Assemblymember noted in her letter to US Judge Dean Pregerson in January, in support of the writ of habeas corpus, the trial judge on the record stated he was "troubled" with this case and "not happy with the way the [prosecutors] handled this case.""

Obie Anthony, another exoneree, told the Vanguard, "In any case prosecutorial misconduct is egregious and in my opinion bad acting prosecutor should be held accountable, and where there are echoes of misconduct, one should want to take a look, such is the Anand Alexander case."

There are a lot of problems with the case of Anand Jon Alexander, but appeals to racial and religious prejudice were clear and overt during his trial and need to be rectified during the post-conviction process.

—David M. Greenwald reporting

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