

EXHIBIT B

1 I, Asia Davis, declare the following to be true and correct to the best of my recollection:

2 1. I have personal knowledge of the facts set forth below and if called and sworn as a witness,
3 would testify competently thereto.

4 2. I am currently incarcerated by the California Department for Corrections and
5 Rehabilitation (“CDCR”) at the Central California Women’s Facility (“CCWF”) in Chowchilla,
6 California. My CDCR Number is WF9357. I reside in Unit 507 and was residing in Unit 507 when the
7 events described below occurred.

8 3. I met Jonathan Robertson (a/k/a Syiaah Skylit) (CDCR# WB1151), another person in
9 custody at CCWF, in late April or early May 2022. We quickly became close friends and began to spend
10 time together on the B-Facility yard.

11 4. Jonathan identifies as transgender and is comfortable being referred to by any pronouns.
12 Jonathan also goes by the names Sky and Syiaah. I use the name Jonathan and male pronouns to refer to
13 him.

14 5. On the afternoon of May 19, 2022, I had not eaten or had anything to drink. It was hot that
15 day and I was sitting with Jonathan and some other people on the yard. I was drinking a small cup of
16 pruno (alcohol). I had a few sips and Jonathan and I briefly kissed and caressed each other.

17 6. Shortly after, due to the lack of food, heat, and dehydration, I became dizzy and nauseous
18 and went to the porta-potty to vomit. Jonathan, concerned for me, entered the porta-potty as well, and
19 rubbed my back while I vomited.

20 7. While I was sick in the porta-potty, Michelle Calvin (WB1127), opened the door and
21 encouraged Jonathan to leave out of concern for his safety, specifically the consequences if custody staff
22 found him in the porta-potty with me.

23 8. When Jonathan left, I could hear other people in custody yelling and questioning his
24 presence in the porta-potty with me. Although I was unable to move and my eyes were closed, I heard
25 Officer Martinez instruct Jonathan to exit the yard and return to his unit.

26 9. I was assisted back to my room by some other people in custody. I remember them asking
27 me if Jonathan had hurt me and I told them he had not hurt me. I fell asleep when I got back to my room.

28 10. That evening, I was taken to the hospital. I later learned my roommates were concerned

1 because they were unable to wake me, and I appeared to be having difficulty breathing. I was medically
2 evaluated, re-hydrated and returned to my unit.

3 11. The next morning, May 20, 2022, I met Jonathan on the yard, and we spoke about the
4 events of the previous day. Jonathan was very concerned for me having learned I had gone to the hospital
5 the previous evening.

6 12. Later that morning, I learned Jonathan had been accused of sexually assaulting me, had
7 been placed in a programming cage and was questioned.

8 13. I was also questioned by a sergeant from the Investigative Services Unit (“ISU”) regarding
9 this allegation and I told them Jonathan was my best friend and that he did not and would never hurt me.

10 14. I was also given a Rules Violation Report (“RVR”) indicating I had engaged in consensual
11 sexual acts with Jonathan on the yard the previous day.

12 15. After being questioned by the ISU sergeant, I returned to my unit. While there I was told
13 that Jonathan was on the yard and was being threatened by a group of people in custody due to the false
14 sexual assault allegation.

15 16. I made my way to the yard, but by the time I got there, Jonathan had been taken from the
16 yard by custody staff and was being questioned in a programming cage again. I told the group who were
17 agitated and claiming Jonathan had raped me that he had not harmed me at all.

18 17. Among that group were individuals who continued to insist, despite my repeated denials,
19 that Jonathan had raped me.

20 18. As the rumor that I had been raped by Jonathan spread, I repeatedly informed everyone
21 who asked that he had not harmed and would never harm me.

22 19. I am very concerned for Jonathan as he is being held indefinitely in isolation due to an
23 investigation and threats to his safety that resulted from these false allegations and rumors.

24 20. I have since learned that the false allegations and rumors that Jonathan raped me were made
25 public to prevent transgender women, nonbinary, and intersex people from living in institutions designated
26 for women under a new law, Senate Bill 132.

27 21. I am not aware of any sexual violence perpetrated by a transgender, nonbinary or intersex
28 person who has transferred to CCWF under Senate Bill 132.

1 I, Asia Davis, declare under penalty of perjury, that the foregoing is true and correct to the best
2 of my knowledge and ability.

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4 Executed on 6-24, 2022, at Chowchilla, California.

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8 Asia Davis
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