

Case No. S277120

IN THE SUPREME COURT OF CALIFORNIA

ARMIDA RUELAS, et al.,

Plaintiffs-Respondents,

v.

COUNTY OF ALAMEDA, et al.,

Defendants-Petitioners

United States Court of Appeals for the Ninth Circuit, Case No. 21-
16528

Appeal from United States District Court for the Northern District of
California, Case No. 4:19-cv-07637-JST, Hon. Jon S. Tigar

**APPLICATION TO FILE AN AMICUS CURIAE BRIEF IN SUPPORT
OF ARMIDA RUELAS AND PROPOSED AMICUS CURIAE BRIEF BY
LEGAL SERVICES FOR PRISONERS WITH CHILDREN**

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**APPLICATION FOR LEAVE TO FILE
AMICUS CURIAE BRIEF**

Under California Rules of Court, rule 8.520(f), Legal Services for Prisoners with Children (LSPC) requests leave to file the attached amicus curiae brief. We support Petitioner's request that the Court reverse the District Court's dismissal of the case.

LSPC organizes communities impacted by the criminal justice system and advocates to release incarcerated people, restore civil and human rights to the currently and formerly incarcerated, and reunify families and communities. We advocate for families impacted by the criminal justice system, paying particular attention to how criminal convictions, incarceration, and other collateral consequences of criminal justice involvement unfairly burden families.

LSPC has a direct interest in the outcome of this case, as it advocates for the rights of incarcerated individuals and their families. LSPC has relevant expertise and experience in advocating for the rights of incarcerated and detained individual's rights under the California Constitution.

The amicus brief that LSPC intends to submit will provide information on the of Labor Code §1182.12 and its application to all persons performing labor, as well as the policy consequences of the financial burden of substandard wages. This information will be helpful to the Court in deciding this case and will not unduly burden the parties or the Court.

We respectfully ask the Court to accept the attached brief for consideration.

Dated: June 1, 2023

/s/ Kellie Walters
Counsel for Legal Services
for Prisoners with Children

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Support of Plaintiffs-Respondents**

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I. INTRODUCTION AND SUMMARY OF ARGUMENT

The primary focal point of this case is whether non-convicted pre-trial detainees should be entitled to minimum wage and overtime pay for the work they complete for a for-profit corporation. This brief provides two reasons why this court should do so: first, the obligations this court has under §1182.12 of the labor code, and second, the pronounced financial consequences of substandard wages on the families of pre-trial detainees.

First, this court must find that the non-convicted pre-trial detainees are entitled to minimum wage and overtime because the

minimum wage, as established by the surrounding statutes, applies to all individuals working in any industry, with only very specific exceptions. It should be noted that incarcerated workers are not among those exceptions and thus are entitled to the same minimum wage. Any employer who fails to provide adequate compensation is in violation of the Labor Code and should be held accountable in such cases.

Furthermore, our brief also brings to the Court's attention the extreme financial difficulties that the families of pre-trial detainees face as a result of the absence of compensation for their work. Our brief delves into the social and economic research¹ surrounding forced labor and pretrial detention, examining its ramifications on the detainees and their families. As the Court deliberates on the issues brought forward by the parties involved, Amici's counsel respectfully urge the Court to consider their analysis regarding the pronounced financial consequences that accompany any form of detention or incarceration and how it is compounded by the refusal to pay detainees a fair wage for

¹ Despite data limitations, numerous studies have analyzed the effects of incarceration. Unfortunately, most of these studies fail to distinguish between different forms of incarceration, including prison, jail, pretrial detention, or post-conviction incarceration.

their labor. Research conducted in the realm of social science has demonstrated that the negative impact on the families and communities of those who are detained or imprisoned is undeniable.

II. ARGUMENT

A. **The Plain Meaning of Labor Code §1182.12 Applies to All Persons Performing Labor**

The plain meaning of Labor Code §1182.12 applies to all persons performing labor. The text of §1182.12 is clear and unambiguous. Its surrounding statutes support it and convergence upon the same meaning – the minimum wage it sets out applies to all persons in all industries, with very narrow express exceptions. Incarcerated workers are *not* among those exceptions. The minimum wage accordingly applies to them, and any employer not paying sufficient compensation is in violation of the Labor Code and such violations should be remedied in particular cases.

1. The plain meaning of a statute's text is the primary criterion of its construction

This Court has long stressed that textual clarity is the starting point of interpretation and, when found, the end point. "It is a settled

principle in California law that 'When statutory language is thus clear and unambiguous there is no need for construction, and courts should not indulge in it.'" *In re Waters of Long Valley Creek Stream System* (1979) 25 Cal.3d 339, 348 (citing *Solberg v. Superior Court* (1977) 19 Cal.3d 182, 198). When there is "express, unambiguous language," when a law conveys an "unambiguous command," there is no authority for a court to "go behind the express terms of the provision in search of legislative intent" contrary to the express text. *In re Lance W.* (1985) 37 Cal.3d 873, 886.

It is not for nothing that William Blackstone places text in first position on his list of methods of interpretation of the laws. "Words are generally to be understood in their usual and most known signification [...] their general and popular use."² The "general and popular use" does not hold when there is a "technical term."³ The words in which the Labor Code sections at issue are written employ no such technical language but are words that ordinary persons can comprehend.

² Blackstone, 1 COMMENTARIES, Intro., Sect. II.

³ Ibid.

Here, the wage laws of Division 2, Part 4, Chapter 1 are said to apply in “any[...] industry” and to “men, women and minors” unless employed as outside salesmen or in a national service program defined by federal law. Labor Code, §1171. There is no exclusion for persons incarcerated in any facilities; specifically, persons in jail, be they pretrial or postconviction or civilly detained. Nor are there exclusions for persons in prison or other state institutions of incarceration. Hence, the plain meaning is that the rules apply to them all.

Section 1182.12 (a) establishes that “the minimum wage for all industries shall be not less than” a set amount as of a given date; subsequent clauses in that code section gradually increased the amount by increments, up to \$15, as current. Labor Code §1182.12 (b). The section was most recently revised in the 2016 legislative session and did not then include any exclusions for incarcerated workers. Therefore it should be presumed that the legislature intended what it expressly said in the text – that the minimum wage applies to all.

2. Reasonableness of reading is the touchstone of ordinary language.

In reading a statute, the interpret seeks not subjective intention but an “objectified’ intent – the intent that a reasonable person would

gather from the text of the law.”⁴ The text is “what the legislature said.”⁵

When a literal reading produces absurd results or results clearly inconsistent with its purpose, a reading that goes contrary to the literal is appropriate. These are the fifth and fourth statutory construction canons, respectively, discussed by Blackstone.⁶ Even a court rejecting the notion that plain meaning can furnish a rigid, absolute rule, acknowledges that “the language of the statute is the most important factor to be considered[...]. [A]ll language has limits, in the sense that we are not free to attribute to legislative language a meaning that it simply will not bear in the usage of the English language.”⁷

In the present context, it is simple not reasonable to attribute a meaning to the statute that its language cannot plausibly bear. “All” in

⁴ Antonin Scalia, *A MATTER OF INTERPRETATION* (1997), 17.

⁵ *Id.* at 18. On the point of textual priority, Justice Scalia’s liberal interlocutors agreed. “The law [...] is what Congress has said, which is fixed by the best interpretation of the language it used[...].” Ronald Dworkin, “Comment” in *Id.* at 118. Lawrence Tribe, though restricting his remarks to federal statutes, voiced a position on the “primacy of text” that would apply equivalently for state statutes. *Id.* at 74.

⁶ Blackstone, 1 *COMMENTARIES*, Intro., Sect. II.

⁷ *State v. Courchesne*, 262 Conn. 537, 563-564 (Conn. 2003). The opinion from the high court of Connecticut is worth citing due to its extensive, painstaking analysis of statutory construction principles.

“the minimum wage for all industries” means all industries. Labor Code §1182.12. Section 1171 makes clear that “the provisions of this chapter shall apply to and include men, women and minors employed in *any occupation, trade, or industry* [...]” with enumerated exceptions.⁸ The legislature could hardly have been clearer in stating the general applicability of the minimum wage laws.

3. Incarcerated Workers are Employees, Whether Employed by the State or its Subdivisions or by a Private Contractor

Labor Code Section 1182.12 (b) (3) provides: "For purposes of this subdivision, 'employer' means *any person* who directly or indirectly, or through an agent or any other person, employs or exercises control over the wages, hours, or working conditions of any person. For purposes of this subdivision, 'employer' includes the state, political subdivisions of the state, and municipalities." (emphasis added)

Accordingly, when the California Department of Corrections assigns incarcerated persons in prison to such services as food service or cleaning of spaces outside their own living quarters, CDCR is functioning as an employer. When a local jail does the same, it is an

⁸ Labor Code §1171 (emphasis added).

employer. When a private company, such as Aramark, is the legal person acting directly or indirectly, it is an employer under §1182.12(b)(3). The text is general and emphatic in its repeated use of the universal quantifier “any.” There are no exceptions.

An employee is defined logically by the same Section 1182, subparagraph (b)(3). They are the “any person” over whose wage, hours, and working conditions the “employer” exercises control; they are the “person” who is “employ[ed]” by the employer. There is no other plausible or reasonable way to read the language of the statute. Here is a typical dictionary definition of the term: “*one employed by another usually for wages or salary and in a position below the executive level.*”⁹

Labor Code Section 1182.12 contains no exceptions for persons in jails. Nor does any other labor statute. The plain meaning of the text and context reveal that the minimum wage, and related protections, apply to incarcerated workers, that is, persons doing work while incarcerated.

⁹ “Employee.” Merriam-Webster.com Dictionary, <https://www.merriam-webster.com/dictionary/employee>. Accessed 1 Jun. 2023. (emphasis added)

4. The District Court's Dicta that the Labor Code Does Not Apply to Persons in Prison Is Groundless

In the Northern District of California federal District Court, Judge Tigar wrote: "As this Court noted in its previous order, the Penal Code presumes that the Labor Code does not apply to convicted state prison inmates unless specifically indicated. ECF No. 46 at 19; see Cal. Penal Code § 2811 ('[I]n no event shall [state prisoner compensation] exceed one-half the minimum wage provided in Section 1182 of the Labor Code, except as otherwise provided in this code.') [...] . To that end, while the Penal Code explicitly addresses employment and wages of state prisoners, see, e.g., Cal. Penal Code §§ 2811, 2700, it does not explicitly address such matters for pretrial detainees confined in county jails. The Court reads this omission to imply that the California legislature did not intend to exclude pretrial detainees from the Labor Code's protections."¹⁰

The last point, that pretrial detainees in jails are not excluded from the Labor Code, is surely correct. There is no basis to read in an exclusion.

¹⁰ 4:19-cv-07637-JST, Dkt 66, at 18.

However, Judge Tigar's reasoning in the first portion of the quoted passage turns statutory construction on its head. Ignoring the unambiguous language of the Labor Code, he reads into it a massive exclusion on the basis of an implied meaning of the Penal Code; however, the Penal Code doesn't imply what Judge Tigar thinks it does either. Therefore, the conclusion that persons incarcerated in prison are excluded from the Labor Code is doubly wrong. The relationship between the two codes that he imputes is not there. As the Labor Code is not ambiguous, there was no need to appeal to extrinsic evidence of its intent; and the provisions of the Penal Code cited do not have the extent or implications suggested. Penal Code 2700 contemplates that workers can and will be compensated but does not say anything about the wage rate. Hence, it is compatible with applying Labor Code 1182.12. There is no conflict between those statutes to resolve, so the Labor Code, which expressly apply generally, should govern.

Penal Code Section 2811, in contrast, is an ambiguous, indeed, outright incoherent statute. On the surface it apparently purports to set a 50% wage cap for some, but not all, persons working in prison, namely, those under the Prison Industry Authority. However, it pegs

that supposed cap to a nonexistent provision in Labor Code Section 1182. It is the very essence of “decimalized” code sections – as distinct from subdivisions with a code section – that a decimal section is a separate section of the code. Therefore, “1182” cannot be taken to mean “1182.12” – they are not the same section. The interpretation of section references in the Penal Code, of all places, has to be exact. Therefore, Section 2811 does not have the cross-reference that Judge Tigar’s statement presupposes. In terms of current effect, Penal Code Section 2811 is effectively abrogated. It was adopted in 2005. The current Labor Code 1182.12 dates from 2016. Had the legislature intended to incorporate a reference of the latter into the former, it could have done so at that time, but it chose not to.

Accordingly, Labor Code 1182.12’s minimum wage trumps the incoherency of Penal Code Section 2811 as read by Judge Tigar. His inference that pretrial detainees in jail are not exempt from the Labor Code is certainly correct; however, it is also true that postconviction incarcerated persons, whether in jail or prison, are not exempt either.

5. This Court Need Not Rule on the Status of Persons in Prison

The previous section of the present brief argues that persons in prison are subject to the protections of the Labor Code, including minimum wage, as properly interpreted. In the alternative, this Court could decline to reach that question. The principle of judicial restraint supports the policy of avoiding reaching issues that are not properly before the court; and since this plaintiffs only assert claims as to their situation in jail, and those similarly situated, the question of prison need not arise. The Court could prudently reserve that issue for a future occasion.

B. The Negative Consequences of Pretrial Detention Are Unfairly Imposed Upon Those with The Least Amount of Resources

1. The Scope of Pre-Trial Detention

In the United States, there are approximately 11 million new jail admissions every year,¹¹ with approximately 79% of them awaiting

¹¹ ZHEN ZENG, BUREAU OF JUSTICE STATISTICS, OFFICE OF JUSTICE PROGRAMS, U.S. DEPT OF JUSTICE, NCJ 251210, JAIL INMATES IN 2016 (2020).

trial.¹² Shockingly, jails accommodate 18 times more people than prisons on an annual basis.¹³ Currently, there are 427,000 legally innocent individuals in the US who are awaiting trial while incarcerated.¹⁴ Worse yet, California locks up “549 per 100,000,” including “prisons, jails, immigration detention, and juvenile justice facilities.”¹⁵ Specifically, there are 458,000 people involved in the criminal legal system in California and 78,000 of them are in local jails.¹⁶

A significant number of those detainees are dependent on their family members who must spend their own meager resources on the expenses such as a 15-minute phone call, averaging \$2.03 in

¹² Evan M. Lowder, Chelsea M. A. Foudray, and Madeline McPherson , *Proxy Assessments and Early Pretrial Release: Effects on Criminal Case and Recidivism Outcomes* 28 Psych. Pub. Pol. And L. 374 (2022)

¹³ Copp, Jennifer E. and William D. Bales. "Jails and Local Justice System Reform: Overview and Recommendations." *The Future of Children*, vol. 28 no. 1, 2018, p. 103-124. *Project MUSE*, doi:10.1353/foc.2018.0005.

¹⁴ Wendy Sawyer and Peter Wagner, *Mass Incarceration: The Whole Pie 2023*, Prison Policy Initiative (May 30, 2023), <https://www.prisonpolicy.org/reports/pie2023.html>

¹⁵ Prison Policy Initiative, *California Profile*, <https://www.prisonpolicy.org/profiles/CA.html> (June 1, 2023)

¹⁶ Id. (this includes people on parole, probation, incarcerated in state prison, incarcerated in federal prison, detained in local jails, youth, and those involuntarily committed.)

California,¹⁷ or the exorbitant items at the canteen (e.g \$1.39 for a package of ramen noodles, which would otherwise cost \$.25 at a grocery store) just to provide their loved ones with basic necessities.¹⁸

2. Many in Pretrial Detention are Charged with minor or non-violent offenses and will either not be convicted or never see a trial.

Of the 427,000 pre-trial detainees, 290,000 of them have been charged with non-violent offenses.¹⁹ Data from Philadelphia reveals that between 2006 and 2013, 60% of pretrial detainees were charged with nonviolent crimes and 28% faced misdemeanor charges.²⁰

Additionally, in 2015, 35% of pretrial jail admissions in New York City

¹⁷ Prison Policy Initiative, *State of Phone Justice 2022*, https://www.prisonpolicy.org/phones/state_of_phone_justice_2022.html (June 1, 2023)

¹⁸ Lisa Fernandez, *Protest at Santa Rita Jail over 'inedible' food and rising commissary prices*, KTVU FOX 2, January 20, 2022. (reports a contract that Santa Rita jail has with a vendor guaranteeing the jail \$500,000 a year in sales)

¹⁹ Wendy Sawyer and Peter Wagner, *Mass Incarceration: the Whole Pie 2023*, Prison Policy Initiative (last accessed May 30, 2023), <https://www.prisonpolicy.org/reports/pie2023.html>

²⁰ Megan Stevenson, *Distortion of Justice: How the Inability to Pay Bail Affects Case Outcomes*, Oxford Academic, <https://academic.oup.com/jleo/article/34/4/511/5100740> (last accessed June 1, 2023)

were for misdemeanor charges.²¹ Research has shown that a significant portion of individuals who are detained before their trial could have been released if granted pretrial release. Studies indicate that 20% to 50% of pretrial detainees end up having their charges dismissed or being acquitted, depending on the location.²²

If an individual is unable to achieve acquittal or dismissal, it may be beneficial to consider taking a plea deal. Opting for a plea bargain, whether it is agreed upon or decided by a judge or jury, provides a chance to secure release from jail. This can mean relocating from jail to home or to a prison with better conditions. However, individuals facing minor charges may have the option to choose "time served" or probation.²³

²¹ Preeti Chauhan et al., *Trends In Custody: N.Y.C. Dep't Of Correction, 2000-2015* (John Jay Univ./Misdemeanor Justice Project, New York, N.Y.), (April 5, 2017), https://datacollaborativeforjustice.org/wp-content/uploads/2020/04/DOC_Custody_Trends.pdf (last accessed June 1, 2023).

²² Megan Stevenson, *Distortion of Justice: How the Inability to Pay Bail Affects Case Outcomes*, Oxford Academic, <https://academic.oup.com/jleo/article/34/4/511/5100740> (last accessed June 1, 2023)

²³ Paul Heaton, Sandra Mayson & Megan Stevenson, *The Downstream Consequences of Misdemeanor Pretrial Detention*, 69 Stan. L. Rev. 711 (2017)

For those who have a family to support, this possibility can be quite appealing since it allows for a return to the workforce and the elimination of the costs associated with detention.

3. Pre-Trial Detention Serves as a Punishment for those with limited resources.

The impact of bail on a defendant can vary greatly depending on their available resources. For those with limited financial means, it can be a devastating blow, while for those who are more well-off, it may be seen as only a minor inconvenience. For example, in New York, if the bail is set at \$500 or less, a mere 15% of defendants can make the payment.²⁴

Also, people being detained within jail have a significantly lower income than those who are not. The median income of a detainee prior to their detention was \$15,109 annually. This is 48% less than the median income of similarly aged people who are not detained or incarcerated.²⁵ Further, people detained within jails are even more

²⁴ Nick Pinto, *The Bail Trap*, N.Y. Times, August 13, 2015

²⁵ Bernadette Rabuy and Daniel Kopf, *Detaining the Poor: How Money Bail Perpetuates an Endless Cycle of Poverty and Jail Time*, Prison Policy Initiative), <https://www.prisonpolicy.org/reports/pie2023.html> (last accessed May 30, 2023)

poverty stricken than those incarcerated within state prisons. “[I]n 2015 dollars, the median annual income of a person in a local jail was, prior to their incarceration, 79% of the median pre-incarceration income for a person in state prison.”²⁶

a) It further punishes the families who also have limited resources

When thinking about incarceration, it's essential to take into account how it can affect multiple areas of life, specifically housing stability and financial security. While there is a wealth of research on the broader impact of incarceration, it's equally crucial to evaluate these similarly significant collateral consequences.

When a defendant is taken into custody, their household income is typically disrupted, causing further strain on their family. Moreover, defendants often need to turn to their loved ones for bail, leading to missed school or work as they scramble to secure bail or find a bail bond.

²⁶ Id citing Bernadette Rabuy and Daniel Kopf, *Prisons of Poverty: Uncovering the Pre-Incarceration Incomes of the Imprisoned*, Prison Policy Initiative <https://www.prisonpolicy.org/reports/income.html> (last accessed May 30, 2023)

Based on studies, it seems that post-release from incarceration, there may be enduring adverse effects on various socioeconomic and health-related aspects.²⁷ A short stay in jail can have negative consequences on an individual's ability to maintain stable housing, employment, and custody of their children.²⁸ Furthermore, various studies have found a connection between past imprisonment and bias in employment opportunities,²⁹ lower wages, decreased employment rates, and very limited opportunities for upward economic mobility.³⁰

Incarceration has significant effects on the health and well-being of those connected to individuals who are currently or formerly

²⁷ Jeremy Travis, Bruce Western, & Steve Redburn, *The Growth Of Incarceration In The United States: Exploring Causes And Consequences* (2014), <https://nap.nationalacademies.org/catalog/18613/the-growth-of-incarceration-in-the-united-states-exploring-causes> (last accessed June 1, 2023).

²⁸ Evan M. Lowder, Chelsea M. A. Foudray, and Madeline McPherson, *Proxy Assessments and Early Pretrial Release: Effects on Criminal Case and Recidivism Outcomes* 28 Psych. Pub. Pol. And L. 374 (2022)

²⁹ Devah Pager, *The Mark of a Criminal Record*, 108 AM. J. SOC. 937-75 (2003)

https://inequality.stanford.edu/sites/default/files/media/media/pdf/Reference%20Media/Pager_2003_Crime%20and%20the%20Legal%20System.pdf (last accessed June 1, 2023)

³⁰ Becky Pettit & Christopher J. Lyons, *Incarceration And The Legitimate Labor Market: Examining Age Graded Effects On Employment And Wages*, 43 Law & Soc'y Rev. 725 * (2009)

incarcerated. Partners or family members of incarcerated individuals often experience financial strain,³¹ low home ownership rates, low vehicle ownership rates, and general reduced wealth.³² Children of incarcerated parents also face numerous challenges, such as housing instability³³ and lower educational achievement.³⁴ These implications highlight the need for a better understanding of the complex effects of incarceration on families and communities, including the manner by which we can lessen the financially punitive effects on the families.

Short periods of incarceration or pre-trial detention can still have a negative impact on families. People who have been detained for 3 days

³¹ Amanda Geller, Irwin Garfunkel, & Bruce Western, *Paternal Incarceration and Support for Children in Fragile Families*, Demography (2011) <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3220952/> (last accessed June 1, 2023)

³² Katherine Beckett & Allison Goldberg, The Effects Of Imprisonment In A Time Of Mass Incarceration, 51 Crime & Just. 349 (2022)

³³ Amanda Geller, Irwin Garfunkel, & Bruce Western, *Paternal Incarceration and Support for Children in Fragile Families*, Demography (2011) <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3220952/> (last accessed June 1, 2023).

³⁴ Rosa M. Cho, *Understanding the Mechanism Behind Maternal Imprisonment and Adolescent School Dropout*, 60 Fam. Rel. 272, 272-89 (2011), <https://www.jstor.org/stable/41236766> (last accessed June 1, 2023)

suffered missing work, the loss of their jobs, an inability to care for family members.³⁵ Unfortunately, the bail system often targets communities that have limited financial resources. This means that families who are already struggling must bear the burden of paying for bail, making phone calls to their loved ones, traveling for visitations, and covering other essential expenses. To do this family members must “borrow from friends and family, raid retirement plans, cut back on food, bills, and holiday presents, miss rent payments, and sell personal property[.]”³⁶

4. Offering detainees a fair wage for their labor can alleviate the financial burden of detention that both they and their families face.

Constitutional and Labor rights aside, this court has the rare opportunity to lessen the devastation that pre-trial detention can have on the families of detainees. A detainee who has a paycheck in their hands at the end of the week can continue to provide for their families. Additionally, that detainee will not have to rely on the already strapped

³⁵ Jamie Fellner, et al., *Not in It for Justice: How California’s Pretrial Detention and Bail System Unfairly Punishes Poor People*, Human Rights

³⁶ *Id.*

resources of their family for visits, telephone calls, and canteen items. Furthermore, offering detainees a fair wage will especially support people of color and their families, who are disproportionately impacted by pretrial detention. It is crucial to recognize and address these disparities to promote a justice system that allows people the opportunity to prosper and advance rather than handicap them further.

III. CONCLUSION

In consideration of the detrimental impact that pretrial detention can have on both public safety and the socioeconomic welfare of detainees, it is recommended that the court take measures to mitigate the economic harm by ensuring that detainees receive a fair wage and apply the Labor Code's wage protections to incarcerated workers. This will not only enable them to support their loved ones financially but also provide a safety net upon their eventual release.

DATED: June 1, 2023

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I, Kellie Walters, counsel for amicus curiae, do hereby certify that Microsoft Word, the word processing program used to generate this brief, the word count of this brief is 4,030.

/s/ Kellie Walters

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I, Kellie Walters, an attorney, state that I delivered the above

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This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

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

6/1/2023

Date

/s/Kellie Walters

Signature

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Legal Services for Prisoners with Children

Law Firm