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CLERK OF DISTRICT COURT  
EASTERN DISTRICT OF CALIF.  
AT SAN FRANCISCO  
BY \_\_\_\_\_

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15 IN THE UNITED STATES DISTRICT COURT

16 FOR THE EASTERN DISTRICT OF CALIFORNIA

17 LILLIAN ROBBINS, as administratrix  
18 of the estate of Kathy Robbins, deceased,  
19 and as surviving mother and heir of Kathy  
20 Robbins; and JAMES ROBBINS, SR., as the  
21 surviving father and heir of Kathy Robbins,

22 Plaintiffs,

CIVIL ACTION NO.:  
CIVS-85-0675 RAR

23 vs.

24 COUNTY OF GLENN, CALIFORNIA;

AMENDED CIVIL RIGHTS  
COMPLAINT FOR DAMAGES

25 ROGER L. ROBERTS, individually and  
26 in his official capacity as Sheriff  
of the County of Glenn, California;

C.B. HARRISON, TODD JAMES,  
VIRGINIA COLLINS, JOHN EDWARDS,  
J.L. BRANDENBERGER, DIANA KILLEBREW,  
BECKY BARTUCCO, VIRGINIA INGRAHAM,  
FRAN LANGFORD, and PETER R. RAMIREZ,  
individually and in their official  
capacities as jailers, deputy jailers,  
or other employees of the Sheriff's  
Department, County of Glenn,  
California; JANE HAHN, individually  
and in her official capacity as  
Chief Probation Officer of the  
County of Glenn, California;



1 GEORGE A. EDWARDS, GEORGE F. PRIDE,  
2 JOE WILLIAMS, and KEITH C. HANSEN,  
3 individually and in their official  
4 capacities as past and present members  
5 of the Board of Supervisors of the  
6 County of Glenn, California;

7 Defendants.

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8 INTRODUCTORY STATEMENT

9 1. This is a civil rights action for damages resulting from the  
10 wrongful death of a 15 year-old girl, Kathy Robbins, in the Glenn  
11 County Jail on August 29, 1984. The Glenn County Jail is a county-  
12 operated facility, located at 543 West Oak Street, Willows, California,  
13 that defendants use to incarcerate juveniles and adult inmates. Lillian  
14 Robbins, as administratrix of the estate of Kathy Robbins, brings claims of  
15 Kathy Robbins, for unlawful and unconstitutional treatment at the hands of  
16 defendants, that survive her death. Lillian Robbins and James Robbins,  
17 Sr., as surviving heirs of Kathy Robbins, bring wrongful death claims for  
18 their own loss and injuries resulting from the death of their daughter.

19 JURISDICTION

20 2. This Court has jurisdiction of this action under 28 U.S.C.  
21 § 1343(3), this being an action to redress the deprivation, under color of  
22 state law, of rights secured by the Constitution of the United States and  
23 the Civil Rights Act, 42 U.S.C. § 1983.

24 3. This Court also has jurisdiction of this action under 28 U.S.C.  
25 § 1343(4), this being an action to recover damages under acts of  
26 Congress providing for the protection of civil rights, specifically the  
Civil Rights Act, 42 U.S.C. § 1983.







1           10. Defendants C.B. HARRISON, TODD JAMES, VIRGINIA COLLINS, JOHN  
2 EDWARDS, J.L. BRANDENBERGER, DIANA KILLEBREW, BECKY BARTUCCO, VIRGINIA  
3 INGRAHAM, FRAN LANGFORD, and PETER RAMIREZ are, and were at the time of  
4 Kathy Robbins's death, jailers, deputy jailers, and other employees of the  
5 Glenn County Sheriff's Department. In such capacities, they are respon-  
6 sible for the day-to-day operation of the Glenn County Jail and the  
7 safety and welfare of inmates incarcerated therein. Defendants are sued  
8 individually and in their official capacities.

9           11. Defendant JANE HAHN is, and was at the time of Kathy Robbins's  
10 death, the Chief Probation Officer of the County of Glenn, California. In  
11 this capacity, she is responsible under, inter alia, §§ 628, 852, and 854  
12 of the California Welfare and Institutions Code, for detaining minors in  
13 the Glenn County Jail. Defendant is sued individually and in her official  
14 capacity.

15           12. Defendants GEORGE A. EDWARDS, GEORGE F. PRIDE, JOE WILLIAMS, and  
16 KEITH C. HANSEN were, at the time of Kathy Robbins's death, members of the  
17 Board of Supervisors of the County of Glenn, California. As such, these  
18 defendants exercise the powers of the County of Glenn and are responsible  
19 under, inter alia, §§ 850, 851, 853 and 870 of the California Welfare  
20 and Institutions Code §§ 25351, 25380, 25382, and 29602 of the Californ-  
21 ia Government Code, and § 4015 of the California Penal Code for establi-  
22 shing, providing, maintaining, and operating a suitable house or place  
23 for the detention of persons alleged to come within the jurisdiction of the  
24 juvenile court, and for maintaining, operating, and staffing the Glenn  
25 County Jail. These defendants are sued individually and in their official  
26 capacities.





FACTUAL ALLEGATIONS

1  
2 13. On Saturday, August 25, 1984, at approximately 12:30 a.m., while  
3 walking down the street with a girlfriend in Orland, California,  
4 plaintiffs' decedent Kathy Robbins, who had been reported as a runaway,  
5 was taken into custody by Officer Eric Vining of the Orland Police  
6 Department, placed in handcuffs, and transported to the Glenn County Jail.

7 14. When Kathy Robbins and Officer Vining arrived at the Glenn County  
8 Jail on August 25, 1984, defendants refused to contact Kathy's mother, to  
9 release Kathy to her mother or other members of her family, or to place her  
10 in a non-secure alternative to the jail such as Glenn House, a group home  
11 in nearby Orland, California.

12 15. On August 25, 1984, when Kathy Robbins was taken into custody,  
13 there was space available at Glenn House, and Kathy could have been placed  
14 there.

15 16. When Kathy Robbins arrived at the Glenn County Jail on August 25,  
16 1984, defendants decided to incarcerate her in the jail. They conducted a  
17 strip search of her person, then lodged her alone in a male juvenile cell in  
18 the jail. Although she manifested physical indications of previous  
19 suicide attempts, defendants locked her up by herself in an isolated  
20 cell.

21 17. The cell in which defendants lodged Kathy Robbins measures  
22 approximately twelve feet by twelve feet and nine feet, eight inches in  
23 height. It has a solid steel door with a small mesh screen window, which  
24 measures approximately 3-1/2 x 5-3/4 inches. The window is five feet from  
25 the floor. The cell contains two metal bunk beds, a table and bench, a  
26 toilet and a shower space. At the time of Kathy Robbins's death, there



1 was a metal guardrail attached to the top bunk of each bed.

2 18. Defendants incarcerated Kathy Robbins in the male juvenile cell  
3 at the Glenn County Jail from Saturday morning, August 25, 1984, to Wednes-  
4 day, August 29, 1984, at 8:30 a.m., when they took her to a detention  
5 hearing in Juvenile Court. At that hearing, defendant HAHN recommended  
6 that Kathy remain in custody until September 7, 1984. The Juvenile Court  
7 ordered that the matter be continued to a later date and that Kathy remain  
8 incarcerated in the jail. Defendants then returned Kathy to the male  
9 juvenile cell at the Glenn County Jail.

10 19. On Wednesday, August 29, 1984, at approximately 5:40 p.m.,  
11 defendant VIRGINIA COLLINS found Kathy Robbins unconscious and hanging in a  
12 kneeling position from the guardrail of the top bunkbed by a sheet wrapped  
13 around her neck. Defendant COLLINS left Kathy Robbins hanging from the  
14 bunkbed and went to summon defendants JOHN EDWARDS and J.L. BRANDENBERGER.  
15 Defendants EDWARDS and BRANDENBERGER released Kathy Robbins from the  
16 bunkbed and called for medical assistance. Kathy Robbins was transported  
17 to Glenn General Hospital where medical staff attempted to resuscitate her.  
18 At approximately 7:04 p.m., Kathy Robbins was pronounced dead.

19 20. At the time Kathy Robbins was taken into custody on August 25,  
20 1984, defendants failed and refused to notify her mother, LILLIAN ROBBINS,  
21 that she was incarcerated in the Glenn County Jail.

22 21. From the time of Kathy Robbins' initial incarceration in the Glenn  
23 County Jail on August 25, 1984, until her death on August 29, 1984,  
24 defendants failed and refused to facilitate contacts between Kathy  
25 Robbins and her mother, LILLIAN ROBBINS.

26 22. From the time of Kathy Robbins's initial incarceration in the Glenn



1 County Jail on August 25, 1984, until her death on August 29, 1984,  
2 defendants failed and refused to allow plaintiff LILLIAN ROBBINS to visit  
3 her daughter except for a short visit on Monday, August 27, 1984.

4 23. From the time of Kathy Robbins's initial incarceration in the Glenn  
5 County Jail until her death on August 29, 1984, defendants failed and  
6 refused to deliver to her telephone messages that had been left by her  
7 mother, LILLIAN ROBBINS.

8 24. From the time of Kathy Robbins's initial incarceration in the Glenn  
9 County Jail until her death on August 29, 1984, defendants failed and  
10 refused to deliver to her reading materials that had been left for her by  
11 her mother, LILLIAN ROBBINS.

12 25. From the time of Kathy Robbins's initial incarceration in the  
13 Glenn County Jail until her death on August 29, 1984, defendants failed and  
14 refused to provide her with adequate clothing. Instead, defendants  
15 required Kathy to wear jail-issue inmate jumpsuits.

16 26. From the time of Kathy Robbins's initial incarceration in the Glenn  
17 County Jail until her death on August 29, 1984, defendants failed to  
18 prevent her from coming or remaining in contact with adult inmates in the  
19 Glenn County Jail. Instead, defendants allowed and authorized adult  
20 inmates to have direct contact with Kathy.

21 27. Defendants failed to conduct adequate medical and psychological  
22 screening of Kathy Robbins at the time she was initially incarcerated in  
23 the Glenn County Jail. Defendants failed to observe, note, and act upon  
24 physical indications that Kathy Robbins had previously attempted to commit  
25 suicide. Defendants failed to take reasonable precautions to prevent Kathy  
26 Robbins from committing suicide.



1           28. From the time of Kathy Robbins's initial incarceration in the  
2 Glenn County Jail until her death on August 29, 1984, defendants failed to  
3 conduct adequate monitoring of Kathy in her cell in order to insure her  
4 safety and protect her from harm. Defendants failed to conduct any visual  
5 observation of Kathy Robbins for intervals of up to several hours.

6           29. From the time of Kathy Robbins's initial incarceration in the Glenn  
7 County Jail until her death on August 29, 1984, defendants failed to  
8 provide Kathy with adequate medical and mental health services.

9           30. From the time of Kathy Robbins's initial incarceration in the Glenn  
10 County Jail until her death on August 29, 1984, defendants failed to  
11 provide adequately trained staff for Kathy's care and custody.

12           31. From the time of Kathy Robbins's initial incarceration in the  
13 Glenn County Jail until her death on August 29, 1984, defendants failed to  
14 provide adequate supervision of the staff and employees who were  
15 responsible for Kathy's care and custody.

16           32. From the time of Kathy Robbins's initial incarceration in the  
17 Glenn County Jail until her death on August 29, 1984, defendants  
18 incarcerated Kathy in a filthy, dark, depressing, isolated, prison-like cell.

19           33. From the time of Kathy Robbins's initial incarceration in the  
20 Glenn County Jail until her death on August 29, 1984, Kathy was subjected  
21 to harassment, psychological abuse, and intimidation by defendants,  
22 including threats of extensive incarceration in the jail.

23           34. From the time of Kathy Robbins' initial incarceration in the Glenn  
24 County Jail until her death on August 29, 1984, defendants failed and  
25 refused to provide Kathy with any opportunities for exercise or recreation.

26           35. From the time of Kathy Robbins's initial incarceration in the Glenn





1 County Jail until her death on August 29, 1984, defendants failed and  
2 refused to provide Kathy with any programming, regular activities, or  
3 materials to occupy her time. Instead, defendants required Kathy to spend  
4 hours and days alone in a bare cell with nothing to do.

5 36. Prior to the death of Kathy Robbins, defendants received a report  
6 dated October 12, 1983, entitled "Final Report on the Jail Needs Assessment  
7 Study, Glenn County, Willows, California." The report was prepared by  
8 Hughes, Heiss & Associates of San Mateo, California, and by Patrick  
9 Sullivan & Associates of San Luis Obispo, California. The report included  
10 a chapter on "Evaluation of the Existing Jail Facility." The first section  
11 of the evaluation chapter began with the statement, "1. AS CURRENTLY  
12 STRUCTURED, THE JAIL MAKES MANAGEMENT AND CONTROL OF THE INMATE POPULATION  
13 DIFFICULT." The section stated:

14 The configuration of available housing space makes segregation  
15 of the inmate population extremely difficult if not impossible.  
16 . . . The ability to segregate the population reflecting the above  
listed needs makes it difficult for the sheriff to ensure the  
safety of either the custodial staff or the inmate population.

17 The existing facility configuration is extremely inefficient  
18 from the staffing perspective. The jail is divided into a  
19 number of distinct areas which cannot be observed by staff  
20 from any central location. As a result, it is extremely  
difficult for existing staff to manage and observe the  
inmate population. . . .

\* \* \* \* \*

21 The jail lacks a minimal medical examining facility. . . .

22 The facility fails to provide equal housing opportunities for  
23 female inmates. As currently structured, it is extremely  
24 difficult to provide female inmates equal access to outdoor  
25 recreation. Location of the exercise yard adjacent to the  
male housing area makes it extremely difficult to employ the  
area for outdoor exercise for female inmates.

26 It is extremely difficult to maintain the sight and sound  
separation for juvenile inmates when they are housed in the



1 main jail which are required by law. If the sight and sound  
2 segregation standards are met through locking doors dividing  
3 the juvenile section from the remainder of the jail,  
observation and control of juveniles inmates for safety  
purposes is extremely difficult.

4 The section concluded, "In short, as currently configured, the jail is  
5 essentially inconsistent with efficient detention and correction  
6 operations. The inability to segregate the inmate population poses  
7 potential inmate safety problems and raises potential county liability  
8 issues should serious inmate injuries or assaults occur."

9 37. The second section of the evaluation chapter of the October,  
10 1983, report on the Glenn County Jail began with the statement, "2. THE  
11 EXISTING JAIL FACILITY IS CHARACTERIZED BY SERIOUS FIRE AND LIFE SAFETY  
12 PROBLEMS," and discussed the fire and life safety deficiencies in the jail.

13 38. The third section of the evaluation chapter of the October, 1983,  
14 report on the Glenn County Jail began with the statement, "3. FACILITY  
15 OPERATING SYSTEMS ARE SERIOUSLY DETERIORATED AND NEED TO BE REPLACED OR  
16 REPAIRED." The section stated, "The entire plumbing system has seriously  
17 deteriorated, breaks down frequently, and presents a continuing health  
18 problem for both staff and inmates." The section also discussed the  
19 deficiencies in the electrical system in the jail.

20 39. The evaluation chapter of the October, 1983, report on the Glenn  
21 County Jail stated, "[T]he facility does not meet current Board of  
22 Corrections standards for housing inmates for extended periods in local  
23 detention facilities."

24 40. Although the defendants had notice of the health and safety  
25 deficiencies of the Glenn County Jail long before the death of Kathy  
26 Robbins, through the October, 1983, report on the Glenn County Jail, they



1 failed and refused to take adequate steps to remedy those deficiencies.  
2 Such failure and refusal by the defendants subjected Kathy Robbins to  
3 serious health and safety dangers.

4 41. It is the policy, practice, and custom of defendants to detain  
5 and incarcerate juveniles at the Glenn County Jail.

6 42. It is the policy, practice, and custom of defendants to  
7 transport juveniles to the Glenn County Jail in handcuffs.

8 43. It is the policy, practice, and custom of defendants to delay  
9 contacting the parents of juveniles detained at the Glenn County Jail.

10 44. It is the policy, practice, and custom of defendants to refuse  
11 to release juveniles detained at the Glenn County Jail to family members  
12 or to place them in non-secure alternatives to the jail.

13 45. It is the policy, practice, and custom of defendants to incar-  
14 cerate juveniles in filthy, dark, depressing, isolated, prison-like  
15 cells in the Glenn County Jail.

16 46. It is the policy, practice, and custom of defendants to subject  
17 juveniles to strip searches prior to their incarceration at the Glenn  
18 County Jail.

19 47. It is the policy, practice, and custom of defendants to fail to  
20 conduct adequate medical and psychological screening of juveniles incar-  
21 cerated at the Glenn County Jail.

22 48. It is the policy, practice, and custom of defendants to main-  
23 tain a cell in the Glenn County Jail for the incarceration of juveniles,  
24 and to incarcerate juveniles therein, which measures approximately  
25 twelve feet by twelve feet and nine feet, eight inches in height, with a  
26 solid steel door with a small mesh window measuring approximately 3-1/2



1 by 5-3/4 inches which is five feet from the floor, and containing a  
2 table, bench, toilet, shower space, and two metal bunkbeds with metal  
3 guardrails attached to the top bunk.

4 49. It is the policy, practice, and custom of defendants to con-  
5 tinue to incarcerate juveniles in the Glenn County Jail following the  
6 juvenile's detention hearing in Juvenile Court.

7 50. It is the policy, practice, and custom of defendants to  
8 unreasonably restrict contacts between juveniles incarcerated at the Glenn  
9 County Jail and their parents.

10 51. It is the policy, practice, and custom of defendants to refuse  
11 to deliver phone messages from parents to juveniles incarcerated at the  
12 Glenn County Jail.

13 52. It is the policy, practice, and custom of defendants to refuse to  
14 deliver reading materials provided by their parents to juveniles  
15 incarcerated at the Glenn County Jail.

16 53. It is the policy, practice, and custom of defendants to require  
17 juveniles incarcerated at the Glenn County Jail to wear inadequate jail-  
18 issue inmate jumpsuits.

19 54. It is the policy, practice, and custom of defendants to allow  
20 juveniles incarcerated at the Glenn County Jail to have direct contact  
21 with adult inmates in the jail.

22 55. It is the policy, practice, and custom of defendants to fail to  
23 take adequate precautions to prevent juveniles incarcerated at the Glenn  
24 County Jail from committing suicide.

25 56. It is the policy, practice, and custom of defendants to fail to  
26 adequately observe, note, or act upon indications that a juvenile





1 incarcerated at the Glenn County Jail may have suicidal tendencies.

2 57. It is the policy, practice, and custom of defendants to fail to  
3 conduct adequate monitoring or visual observations of juveniles incar-  
4 cerated at the Glenn County Jail.

5 58. It is the policy, practice, and custom of defendants to fail to  
6 provide juveniles incarcerated at the Glenn County Jail with adequate  
7 medical and mental health services.

8 59. It is the policy, practice, and custom of defendants to fail to  
9 provide adequately trained staff for the care and custody of juveniles  
10 incarcerated at the Glenn County Jail.

11 60. It is the policy, practice, and custom of defendants to fail to  
12 provide adequate supervision of the staff and employees at the Glenn  
13 County Jail.

14 61. It is the policy, practice, and custom of defendants to subject  
15 juveniles incarcerated at the Glenn County Jail to harrassment, psycho-  
16 logical abuse, intimidation, and threats of extensive incarceration.

17 62. It is the policy, practice, and custom of defendants to fail to  
18 provide juveniles incarcerated in the Glenn County Jail with opportuni-  
19 ties for exercise or recreation or with materials to occupy their time.

20 63. It is the policy, practice, and custom of defendants to fail to  
21 ensure the safety of either the custodial staff or the inmate population  
22 at the Glenn County Jail.

23 64. It is the policy, practice, and custom of defendants to  
24 incarcerate juveniles in the Glenn County Jail, even though it is extremely  
25 difficult for staff to manage and observe juveniles in the jail.

26 65. It is the policy, practice, and custom of defendants to



1       incarcerate female juveniles in the Glenn County Jail, even though the jail  
2       lacks adequate housing for female juveniles.

3               66. It is the policy, practice, and custom of defendants to  
4       incarcerate juveniles in the Glenn County Jail, even though the jail lacks  
5       a minimal medical examining facility.

6               67. It is the policy, practice, and custom of defendants to  
7       incarcerate juveniles in the Glenn County Jail, even though it is extremely  
8       difficult to provide female inmates in the jail with access to outdoor  
9       recreation.

10              68. It is the policy, practice, and custom of defendants to incar-  
11       cerate juveniles in the Glenn County Jail, even though it is extremely  
12       difficult, if not impossible, to maintain sight and sound separation  
13       between juvenile and adult inmates.

14              69. It is the policy, practice, and custom of defendants to  
15       incarcerate juveniles in the Glenn County Jail, even though adequate  
16       observation and control of juvenile inmates for safety purposes is  
17       extremely difficult, if not impossible, in the jail.

18              70. It is the policy, practice, and custom of defendants to  
19       incarcerate juveniles in the Glenn County Jail, even though the jail  
20       poses severe problems for inmate safety.

21              71. It is the policy, practice, and custom of defendants to  
22       incarcerate juveniles in the Glenn County Jail, even though the jail  
23       contains serious fire and life safety problems.

24              72. It is the policy, practice, and custom of defendants to  
25       incarcerate juveniles in the Glenn County Jail, even though the jail  
26       contains seriously deteriorating plumbing and electrical systems that



1 present continuing health problems for both staff and inmates.

2 73. It is the policy, practice, and custom of defendants to  
3 incarcerate juveniles in the Glenn County Jail, even though the jail  
4 does not meet current Board of Correction standards for housing inmates  
5 for extended periods in local detention facilities.

6 74. It is the policy, practice, and custom of defendants to  
7 incarcerate juveniles in the Glenn County Jail, even though the jail is  
8 not operated in a manner consistent with the juveniles' safety and well-  
9 being.

10 75. It is the policy, practice, and custom of defendants to allow  
11 the deficiencies noted in the October, 1983, evaluation of the Glenn  
12 County Jail to continue without taking adequate steps to remedy them.

13 76. As a proximate result of the foregoing policies, practices,  
14 acts and omissions of the defendants, plaintiffs' decedent Kathy Robbins  
15 suffered fatal injuries.

#### 16 LEGAL CLAIMS

17 77. For plaintiffs' legal claims, each enumerated below, they reallege  
18 Paragraphs 1 through 76 above, as if fully set forth herein, in each and  
19 every statement of claim, and further allege:

20 78. Since at least October, 1983, defendants have had actual notice  
21 that the Glenn County Jail was not operated in a manner consistent with the  
22 safety and well-being of juveniles incarcerated therein.

23 79. Defendants were responsible for the following policies,  
24 practices, acts, or omissions regarding plaintiffs' decedent Kathy  
25 Robbins:

26 a. Negligently, carelessly, recklessly, and with callous



1 indifference to the rights and safety of Kathy Robbins, failing and  
2 refusing to notify Kathy's mother, LILLIAN ROBBINS, that Kathy was  
3 incarcerated in the Glenn County Jail.

4 b. Negligently, carelessly, recklessly, and with callous  
5 indifference to the rights and safety of Kathy Robbins, failing and  
6 refusing to facilitate contacts or visits between Kathy and her mother.

7 c. Negligently, carelessly, recklessly, and with callous  
8 indifference to the rights and safety of Kathy Robbins, failing and  
9 refusing to allow Kathy's mother to visit Kathy except for a short visit on  
10 Monday, August 27, 1984.

11 d. Negligently, carelessly, recklessly, and with callous  
12 indifference to the rights and safety of Kathy Robbins, failing and  
13 refusing to deliver to Kathy telephone messages that had been left by her  
14 mother.

15 e. Negligently, carelessly, recklessly, and with callous  
16 indifference to the rights and safety of Kathy Robbins, failing and  
17 refusing to deliver to Kathy reading materials that had been left for her  
18 by her mother.

19 f. Negligently, carelessly, recklessly, and with callous  
20 indifference to the rights and safety of Kathy Robbins, failing and  
21 refusing to provide Kathy with adequate clothing, but, instead, requiring  
22 Kathy to wear jail-issue inmate jumpsuits.

23 g. Negligently, carelessly, recklessly, and with callous  
24 indifference to the rights and safety of Kathy Robbins, failing to prevent  
25 Kathy from coming or remaining in contact with adult inmates, but, instead,  
26 allowing and authorizing adult inmates to have direct contact with Kathy.





1 h. Negligently, carelessly, recklessly, and with callous  
2 indifference to the rights and safety of Kathy Robbins, failing to conduct  
3 adequate medical and psychological screening of Kathy at the time she was  
4 initially incarcerated; failing to observe, note, and act upon physical  
5 indications that Kathy had previously attempted to commit suicide; and  
6 failing to take reasonable precautions to prevent Kathy Robbins from  
7 committing suicide.

8 i. Negligently, carelessly, recklessly, and with callous  
9 indifference to the rights and safety of Kathy Robbins, failing to conduct  
10 adequate monitoring of Kathy in her cell in order to insure her safety and  
11 protect her from harm.

12 j. Negligently, carelessly, recklessly, and with callous  
13 indifference to the rights and safety of Kathy Robbins, failing to provide  
14 Kathy with adequate medical and mental health services.

15 k. Negligently, carelessly, recklessly, and with callous  
16 indifference to the rights and safety of Kathy Robbins, failing to provide  
17 adequately trained staff for Kathy's care and custody.

18 l. Negligently, carelessly, recklessly, and with callous  
19 indifference to the rights and safety of Kathy Robbins, failing to provide  
20 adequate supervision of the staff and employees who were responsible for  
21 Kathy's care and custody.

22 m. Negligently, carelessly, recklessly, and with callous  
23 indifference to the rights and safety of Kathy Robbins, incarcerating Kathy  
24 in a filthy, depressing, isolated, prison-like cell.

25 n. Negligently, carelessly, recklessly, intentionally, and with  
26 callous indifference to the rights and safety of Kathy Robbins, subjecting



1 Kathy to harassment, psychological abuse, and intimidation.

2 o. Negligently, carelessly, recklessly, and with callous  
3 indifference to the rights and safety of Kathy Robbins, failing and  
4 refusing to provide Kathy with opportunities for exercise or recreation.

5 p. Negligently, carelessly, recklessly, and with callous  
6 indifference to the rights and safety of Kathy Robbins, failing and  
7 refusing to provide Kathy with any programming, regular activities, or  
8 materials to occupy her time, but, instead, requiring Kathy to spend hours  
9 and days in jail in a bare cell with nothing to do.

10 q. Negligently, carelessly, recklessly, and with callous  
11 indifference to the rights and safety of Kathy Robbins, maintiaining a  
12 juvenile cell with a guardrail that enabled Kathy to commit suicide.

13 r. Negligently, carelessly, recklessly, and with callous  
14 indifference to the rights and safety of Kathy Robbins, failing and  
15 refusing to take adequate steps to remedy the deficiencies in the Glenn  
16 County Jail that had been noted in the October, 1983, evaluation report.

17 80. Defendants engaged in a course of conduct with respect to Kathy  
18 Robbins that was willful, wanton, and grossly negligent, and so blatant-  
19 ly indifferent to her rights and safety as to evidence intentional  
20 maltreatment.

21 81. As a direct and proximate result of defendants' willful, reck-  
22 less, and deliberate failure to properly maintain and supervise juven-  
23 iles in the Glenn County Jail, Kathy Robbins died in her cell at the  
24 jail on August 29, 1984.

25 82. As a direct and proximate result of the aforementioned  
26 policies, practices, acts and omissions of the defendants Kathy Robbins



1 died in her cell at the jail on August 29, 1984.

2 LEGAL CLAIMS OF PLAINTIFF LILLIAN ROBBINS AS  
3 ADMINISTRATRIX OF THE ESTATE OF KATHY ROBBINS

4 83. For plaintiff's legal claims, plaintiff realleges paragraphs 1  
5 through 82 above, as if fully set forth herein, and further alleges:

6 84. The policies, practices, acts, and omissions of the defendants  
7 complained of herein constituted punishment of Kathy Robbins during her  
8 arrest, incarceration, and confinement in the Glenn County Jail, and  
9 violated Kathy Robbins's constitutional right to due process of law.

10 LEGAL CLAIMS OF LILLIAN ROBBINS AND JAMES ROBBINS, SR.,  
11 AS SURVIVING PARENTS AND HEIRS OF KATHY ROBBINS

12 85. For plaintiffs' legal claims, plaintiffs reallege paragraphs 1  
13 through 82 above, as if fully set forth herein, and further allege:

14 86. The policies, practices, acts, and omissions of the defendants  
15 complained of herein deprived plaintiffs of their parental relationship  
16 with their daughter, Kathy Robbins, and caused her wrongful death, and  
17 violated plaintiffs' constitutional right to due process of law.

18 PRAYER FOR RELIEF

19 WHEREFORE, plaintiffs pray that this Court:

20 A. Assume jurisdiction of this action;

21 B. Award LILLISN ROBBINS, as administratrix of the estate of Kathy  
22 Robbins:

23 1. General damages against each of the defendants in the  
24 amount of \$1,000,000, or such damages as may be proved at trial, for the  
25 pain, suffering, and injuries to which they subjected Kathy Robbins  
26 during her lifetime.

2. Punitive damages against each of the defendants, except



1 defendant COUNTY OF GLENN, CALIFORNIA, in the amount of \$9,000,000, or  
2 such damages as may be proved at trial, for the willful, wanton,  
3 reckless, and deliberate disregard of the rights and safety of Kathy  
4 Robbins. Such punitive damages are necessary to penalize defendants and  
5 their agents for such conduct.

6 C. Award LILLIAN ROBBINS and JAMES ROBBINS, SR., as surviving  
7 parents and heirs of Kathy Robbins:

8 1. General damages against each of the defendants in the  
9 amount of \$1,000,000, or such damages as may be proved at trial, for the  
10 severe emotional and physical distress, anxiety, and anguish plaintiffs  
11 suffered by reason of the death of Kathy Robbins, as well as for the  
12 deprivation of decedent's care, support, comfort, society, counsel,  
13 financial support and contributions, future earnings, services,  
14 companionship, protection, guidance, and advice.

15 2. Special damages against each of the defendants in the  
16 amount of \$2,000, or such damages as may be proved at trial, for funeral  
17 costs and other final expenses of the decedent.

18 3. Deterrent damages against each of the defendants in the  
19 amount of \$9,000,000, or such damages as may be proved at trial, to  
20 deter defendants and their agents from such conduct in the future and to  
21 deter others from similar conduct.

22 D. Award plaintiffs the costs of this proceeding, including  
23 attorney's fees and such other and further relief as to this Court

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1 seems just and proper.

2 Dated this 6th day of September, 1985.

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GREER M. SMITH

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Attorney for Plaintiffs

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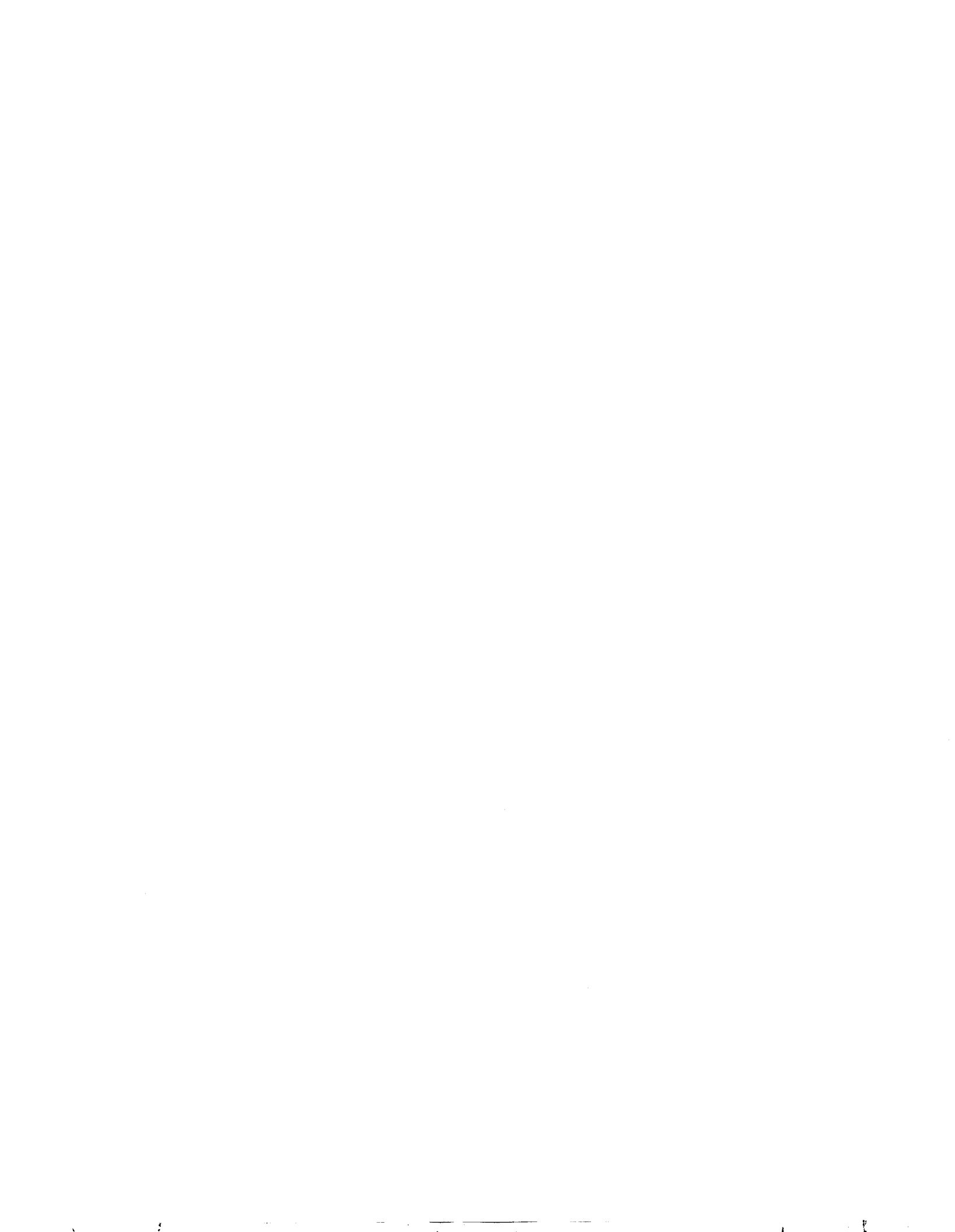
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PROOF OF SERVICE

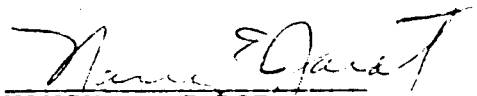
I hereby certify that a true and correct copy of the following document was mailed to:

Leonard G. Krup  
Frost, Krup and Atlas  
134 West Sycamore Street  
Willows, California 95988

postage prepaid, by United States Mail, on this 9th day of September, 1985:

AMENDED CIVIL RIGHTS COMPLAINT FOR DAMAGES.

DATED: September 9, 1985.

  
NANCY E. JACOT

