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9 Attorneys for Federal Defendants and  
10 Defendant United States of America.

11 **IN THE UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

13 CALIFORNIA COALITION FOR WOMEN  
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;  
14 G.M.; A.S.; and L.T., individuals on behalf of  
themselves and all others similarly situated,

15 Plaintiffs

16 v.

17 UNITED STATES OF AMERICA FEDERAL  
BUREAU OF PRISONS, a governmental entity;  
18 BUREAU OF PRISONS DIRECTOR  
COLETTE PETERS, in her official capacity;  
19 FCI DUBLIN WARDEN THAHESHA JUSINO,  
in her official capacity; OFFICER  
20 BELLHOUSE, in his individual capacity;  
OFFICER GACAD, in his individual capacity;  
21 OFFICER JONES, in his individual capacity;  
LIEUTENANT JONES, in her individual  
22 capacity; OFFICER LEWIS, in his individual  
capacity; OFFICER NUNLEY, in his individual  
23 capacity; OFFICER POOL, in his individual  
capacity; LIEUTENANT PUTNAM, in his  
24 individual capacity; OFFICER SERRANO, in  
his individual capacity; OFFICER SHIRLEY, in  
25 his individual capacity; OFFICER SMITH, in his  
individual capacity; and OFFICER VASQUEZ,  
26 in her individual capacity,

27 Defendants.  
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CASE NO. 4:23-CV-04155-YGR

**UNITED STATES’ APRIL 12, 2024 NOTICE**

**FILED UNDER SEAL**

1 In compliance with the Court’s Order at Doc. 88, the United States of America respectfully  
2 notifies the Court of its intent to transfer the following adults in custody (AICs) from FCI Dublin:

- 3 • A [REDACTED] A [REDACTED],
- 4 • C [REDACTED] E [REDACTED] A [REDACTED] H [REDACTED]
- 5 • R [REDACTED] B [REDACTED],
- 6 • K [REDACTED] D [REDACTED],
- 7 • R [REDACTED] E [REDACTED] d [REDACTED] E [REDACTED],
- 8 • R [REDACTED] F [REDACTED],
- 9 • Y [REDACTED] H [REDACTED] d [REDACTED] M [REDACTED],
- 10 • S [REDACTED] L [REDACTED],
- 11 • T [REDACTED] M [REDACTED],
- 12 • S [REDACTED] M [REDACTED],
- 13 • M [REDACTED] M [REDACTED],
- 14 • M [REDACTED] M [REDACTED],
- 15 • [REDACTED] M [REDACTED] R [REDACTED]-P [REDACTED],
- 16 • J [REDACTED] P [REDACTED] B [REDACTED],
- 17 • E [REDACTED] [REDACTED],
- 18 • A [REDACTED] S [REDACTED],
- 19 • A [REDACTED] V [REDACTED], and
- 20 • F [REDACTED] V [REDACTED] G [REDACTED] B [REDACTED].

21 Each of these individuals were listed on the parties’ witness lists, and many of them also  
22 testified at the evidentiary hearing. These individuals, along with the remainder of the inmate  
23 population, will be transferred from FCI Dublin in the coming week due to the closure of the facility.

24 As explained in Docs. 236-2, 236-4, this information is highly sensitive. Disclosure of such  
25 information to the public, to inmates, and even to opposing counsel would be detrimental to facility  
26 management and would increase risk to BOP staff and inmates alike. Mindful of the ongoing safety and  
27 security concerns, counsel for the United States respectfully requests that the Court keep this highly  
28 sensitive information and this filing under seal and *ex parte* until such time as this information is

1 appropriate for broader release. As noted in Doc. 236-4, counsel for the United States has the same  
2 security concerns if this information is released only to a single member of Plaintiffs' legal team. But the  
3 United States defers to the Court on if, when, and how to disclose the information in this notice to  
4 Plaintiffs' counsel. To the extent any such disclosure of this information is made only to a single  
5 member of Plaintiffs' legal team prior to BOP's broader release, which is likely to occur Monday, April  
6 15, 2024, the government requests that the Court enter a protective order to ensure the strictest  
7 confidentiality of this information.

8 Dated this 12th day of April, 2024.

9  
10 JESSE A. LASLOVICH  
11 United States Attorney

12 /s/ Madison L. Mattioli  
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14 ABBIE J.N. CZIOK  
15 MARK STEGER SMITH  
16 TIMOTHY A. TATARKA  
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18 Attorneys for Federal Defendants  
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