

EXHIBIT B-10

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARANDA LYNN O'DONNELL, et al.	)	
Plaintiffs,	)	
v.	)	Case No. 16-cv-01414
HARRIS COUNTY, TEXAS, et al.	)	(Class Action)
Defendants.	)	The Honorable Lee H. Rosenthal
	)	U.S. District Judge
	)	

DECLARATION OF JANNELL ROBLES

1. My name is Jannell Robles. The facts set forth in this declaration are based on my personal knowledge, unless otherwise indicated. If called as a witness, I could and would testify thereto. I am over eighteen years of age and of sound mind to declare to the facts stated herein.

2. I am currently an attorney in private practice in Harris County, Texas. I have previously worked in the Harris County criminal justice system as a public defender, district attorney, and hearing officer. Based on my experience in this system, I believe the Consent Decree is necessary for the local courts and jail to function without unworkable backlogs, delays, and overcrowding.

3. I have seen firsthand how the pretrial practices established by the Consent Decree ensure pretrial detention of misdemeanor arrestees is the exception to the rule.

4. Getting rid of General Order Bonds or making other changes to the Consent Decree that make it harder for misdemeanor arrestees to be quickly released threatens to return the system to widespread unnecessary pretrial detention of misdemeanor arrestees while overwhelming an

already fragile pre-trial system. This is likely to result in unworkable backlogs and delays in both the jail and the courts.

I. My Career Background.

5. I have been licensed to practice law in the state of Texas since 2016. I have worked as a Harris County Criminal Law Hearing Officer presiding over probable cause and bail hearings (also referred to as “magistration hearings” or “Article 15.17 hearings”), an Assistant Public Defender in the bail division, and an Assistant District Attorney, prosecuting misdemeanors.

6. After graduating from South Texas College of Law in 2016, I worked in private practice representing non-citizens in immigration proceedings.

7. In June 2017, I started as a prosecutor with the Harris County District Attorney’s Office (“DAO”) in the misdemeanor division. I also worked as a juvenile and then felony prosecutor.

8. After two years, in June 2019, I went to work as an Assistant Public Defender with the Harris County Public Defender’s Office (“PDO”) in the Bail Division, and then moved to the PDO’s Felony Division. I remained with the PDO until July 2022.

9. In July 2022, I was appointed by a committee of elected judges to work as a Harris County Criminal Law Hearing Officer. I remained in this position through June 2024, when I returned to the PDO Felony Division.

10. Since May 2026, I have been employed in private practice.

II. My experience as an Assistant District Attorney Prosecuting Misdemeanor Arrestees.

11. In June of 2017, when I started my employment as a prosecutor, Judge Lee H. Rosenthal had just issued a preliminary injunction ruling, enjoining Harris County’s misdemeanor bail practices.

12. I observed that people released pretrial were often able to secure an acquittal or dismissal, while those who were detained were far more likely to plead guilty.

13. I also observed that even when defendants had missed court, their lawyers routinely explained that there were barriers to appearance, like lack of transportation or child care, or the inability to miss a shift at a new job. Nevertheless, I was required by office policy, under then-District Attorney Kim Ogg, to move for bond forfeiture any time a defendant missed court, regardless of the reason.

III. My experience as an Assistant Public Defender in the Criminal District Courts.

14. From June 2019 to July 2022, I worked as an Assistant Public Defender. When I started in the Office, Rule 9 was already in effect, and the Consent Decree was entered shortly thereafter, in November 2019.

15. I worked primarily in the Bail Division, which means I met people in the hours after they had just been arrested.

16. My clients were people charged with felony offenses and misdemeanor cases involving the “carveout” offenses—*i.e.* those people charged with more serious misdemeanors or who had been accused of violating a condition of pre-trial supervision—who *must* be detained until a magistration hearing and who *may* be detained after a hearing under Rule 9 using unaffordable bail.

17. At that time, magistration dockets were scheduled for three hours and generally had twenty-five to thirty people on them.

18. The list of people on each docket was released to the PDO two hours before it started. Thus, if there were two public defenders on the shift, each attorney would have about twelve to fifteen people to interview within two hours, giving us each, at best, 10 minutes with

each client. There were occasionally shifts where I had to conduct all these interviews myself, because the other attorney was delayed in magistration. We sometimes struggled to fully develop evidence relevant to the bail hearing, for example a person's ties to the community, but we could not do so because of the time constraints. There were many instances where, during a bail argument at magistration, a client would interrupt me to provide relevant information that was not shared during the initial interview. If we had longer to interview clients, we could more fully develop the facts necessary to making arguments relevant to bail.

19. In the brief time I had with each client, there was a lot of ground to cover. Sometimes the first thing I had to do was spend time finding my clients, for example, if they were stuck in the booking process or sleeping in the chairs from exhaustion.

20. Once I located each client, I needed to interview them about their ties to the community, their ability to get to court, the reasons for any prior missed court appearances, their criminal history, and alternatives to detention we could propose that would give the magistrate assurances that unaffordable bail was unnecessary.

21. Then, I informed them of their rights and advised them on how to conduct themselves in court.

22. As I tried to collect and convey the information I needed to properly represent a client, they were usually desperate to ask their own questions.

23. I was often unable to thoroughly respond in the time I had with each person.

24. If the person had additional complicating circumstances, such as an immigration hold or the possibility of a protective order, the time would be even more compressed.

25. As explained, based on my experience as a public defender in the Bail Division, it would be extremely difficult to represent clients at bail hearings ethically and competently with

any less time with each client. It was incredibly difficult to meet someone for the first time and then have a substantive conversation about facts relevant to bail, probable cause, and any other extenuating circumstance the person may have been facing in ten minutes or less. Any less time would be nearly impossible.

IV. My Experience as a Harris County Criminal Law Hearing Officer.

26. From July 2022 to June 2024, I worked as a Harris County Criminal Law Hearing Officer. As a hearing officer, I was responsible for making the initial probable cause and bail determinations under Article 15.17 of the Texas Code of Criminal Procedure.

27. I worked the weekend night shifts—which are the busiest. I was scheduled to work ten hours overnight from Friday into Saturday, twelve hours from Saturday into Sunday, and twelve hours from Sunday into Monday. However, there were times I worked fifteen-hour shifts either to complete my tasks or because we were short-staffed.

28. Within each ten- or twelve-hour shift, there were typically two hearing officers on duty, and four dockets. We each typically presided over two dockets—scheduled for three hours each—consisting of approximately twenty-five to thirty people charged with class B or higher misdemeanor and felonies each shift. Many of those individuals had multiple charges. On my shift, we also had to do Class C dockets scheduled for 9:00 P.M. and 3:00 A.M. Each on-duty hearing officer would be responsible for one of them.

29. Dockets themselves were rushed. To start, they typically began hours behind schedule.

30. Before being placed on a docket, each person needed to meet with Pretrial Services and a public defender.

31. Correctional officers had to find and move all 25 or 30 individuals into my courtroom.

32. And sometimes the docket scheduled to occur directly before mine would run over. For example, if there were a higher-than-usual number of people on the docket, the hearings were more complex, or many people had multiple charges.

33. Delays at each step of the process were common and would snowball.

34. When we were able to finally hear cases, I never felt like I had enough time, especially if I knew we were already behind schedule.

35. I could spend an average of six minutes for each individual.

36. There was a significant amount of work that had to be done in addition to presiding over the dockets.

37. Each shift, we were presented with mental health warrants that needed to be reviewed under the relevant statute and, if appropriate, signed.

38. At the start of each shift, I would confront a stack of around thirty arrest warrants.

39. I fielded phone calls and emails throughout the night.

40. Magistrates are also required to consider warrants to obtain blood from people suspected of crimes, often related to driving while intoxicated. Arrests for driving while intoxicated were most prevalent during weekend night shifts as compared to all other shifts, so those of us on the weekend night shift typically had numerous blood warrants to review and approve or reject.

41. We also sometimes had to make probable cause determinations prior to the hearing docket. The law requires magistrates to review probable cause for a warrantless misdemeanor arrest within 24 hours of the arrest and for a warrantless felony arrest within 48 hours of the arrest.

We typically made probable-cause determinations at the magistrature hearings. But if cases were approaching the deadlines to consider probable cause, we had to review the charging documents filed by the prosecutor prior to the dockets to determine whether they sufficiently supported probable cause for each element of the charged offense.

42. I also spent time before the hearing dockets preparing for the cases. The case list for each docket came out two hours beforehand, so assuming I had all the materials from pre-trial services, I would try to review files before the docket started to familiarize myself with the upcoming cases, which helped the hearings run more smoothly. This process is sometimes called “early presentment.”

43. During my review, I routinely noticed cases involving people whom I felt comfortable releasing on a personal bond prior to the hearing.

44. In these situations, I would issue the personal bond, and the person would be shifted into the release process, instead of appearing at magistrature.

45. This process of reviewing cases allowed me to reduce the number of people on the docket and devote more time to each of the other people appearing before me.

46. At best, I could spend about four minutes with each case file. Often, I had even less time because I needed to triage other tasks.

47. There was so little time that I could not even take breaks to heat up my food or use the restroom.

48. Whether a person is released or detained prior to trial can impact the outcome of their case, whether they retain custody of their kids, whether they keep their job, and whether they can pay their rent or mortgage. These are life-altering decisions. Hearing officers are forced to make them with very limited time and information.

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

DocuSigned by:

JANNEL ROBLES

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Jannell Robles

8/25/2026

Date