

EXHIBIT X

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

THE STATE OF CALIFORNIA; EDMUND G.
BROWN, JR., GOVERNOR OF
CALIFORNIA, IN HIS OFFICIAL
CAPACITY; AND XAVIER BECERRA,
ATTORNEY GENERAL OF CALIFORNIA,
IN HIS OFFICIAL CAPACITY,

Defendants.

CASE NO. 2:18-CV-490

DECLARATION OF ASSISTANT SPECIAL
AGENT IN CHARGE SIR G. STREETER

I, Sir G. Streeter, hereby declare and state as follows:

1. I am an Assistant Special Agent in Charge with U.S. Department of Homeland Security (DHS), U.S. Immigration and Enforcement (ICE), Homeland Security Investigations (HSI), in the Sacramento office, which is part of the HSI San Francisco Area of Responsibility. I have held this position since November 2016. In this position, I manage approximately thirty-nine special agents and approximately twenty-three support personnel and task force officers in the Central Valley, which includes the counties of Sacramento, San Joaquin and Kern (and surrounding counties).
2. HSI is the investigative arm of the DHS and has authority to enforce a diverse array of federal laws, including but not limited to, transnational gang and drug trafficking activity, financial crimes, money laundering and bulk cash smuggling, human smuggling and trafficking, cybercrimes including child pornography, and customs and export violations.
3. I have over 27 years of law enforcement experience with ICE HSI and its predecessor the Immigration and Naturalization Service (INS). From May 1991 to December 2001, I was an Immigration Inspector with INS at John F. Kennedy International Airport, Queens, New

1 York and Hartsfield Jackson International Airport, Atlanta, Georgia. From December 2001 to
2 August 2009 I was a Special Agent with the HSI office located in Atlanta, Georgia. In
3 August 2009, I was promoted to Supervisory Special Agent in that office and I served in that
4 position until June 2012, whereupon I transferred to the ICE Academy, located at the Federal
5 Law Enforcement Training Center as the Section Chief for HSI Special Agent Basic Training
6 until October 2016. In November 2016, I was promoted to Assistant Special Agent in
7 Charge and assigned to the HSI office in Sacramento, California.

- 8 4. I am aware that Defendants filed an opposition to Plaintiff's Motion for Preliminary
9 Injunction of *United States v. California, et. al.*, Case No. 2:18-cv-490. I have reviewed the
10 declaration of Christopher Caligiuri, ECF 75-1, filed in support of Defendants' opposition to
11 Plaintiff's Motion for Preliminary Injunction. The facts in this declaration are based on my
12 personal knowledge or upon information provided to me in my official capacity.
- 13 5. In the Sacramento Valley Area, the promulgation and passage of SB 54 has negatively
14 affected HSI's ability to investigate and enforce criminal violations of federal law, which in
15 turn, has affected public safety.
- 16 6. While it is true that HSI has not had any issues with its participation in the Tax Recovery and
17 Criminal Enforce Task Force (TRaCE), as stated by Chris Caligiuri, the HSI Sacramento
18 office has encountered problems relating to its participation in another criminal task force.
19 For example, earlier this year, the Sacramento Police Department refused to work with HSI
20 on an Organized Crime Drug Enforcement Task Force (OCDETF) investigation despite
21 having worked with HSI on this task force for several years. The principal mission of the
22 OCDETF program is to identify, disrupt, and dismantle the most serious drug trafficking and
23 money laundering organizations and those primarily responsible for the nation's drug supply,
24 to mount a comprehensive attack against organized drug traffickers in the Sacramento Valley
25 through collaborative involvement of federal, state and local law enforcement agencies,
26 including but not limited to, the Drug Enforcement Administration (DEA), the Internal
27 Revenue Service, the Federal Bureau of Investigation, Homeland Security Investigations,
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1 U.S. Customs and Border Protection Air and Marine Operations, U.S. Marshals Service, the
2 California Highway Patrol, the Elk Grove Police Department (EGPD), the Sacramento
3 County Sheriff's Department, and the Placer County Sheriff's Department.

4 7. In 2014, the OCDETF, including DEA, HSI and the EGPD began investigating a number of
5 indoor marijuana grows in residential neighborhoods throughout the Sacramento area linked
6 to an international criminal organization based in China. Sacramento PD was involved in the
7 investigation, and in on or about July 2017 it participated in an enforcement operation
8 targeting indoor marijuana grows along with the other members of the task force, including
9 HSI. However, in 2018, during the planning stages to execute a larger enforcement operation
10 targeting this criminal organization, Sacramento PD refused to participate and would not
11 provide personnel or marked vehicles for the OCDETF operation because ICE was involved.
12 As the operation involved the execution of eighty-one (81) Federal search warrants across the
13 region, an alternate source for security during this high-risk operation was needed. Thus,
14 HSI had to bring in Special Response Teams from throughout the country to provide this
15 security. Sacramento PD's refusal to work with HSI not only required DHS to expend
16 additional money bringing in special agents from across the country, their absence increased
17 the risk for agents and officers executing the search warrants.

18 8. Many of the indoor marijuana grows associated with this criminal organization are heavily
19 fortified, have monitored camera systems and "security" at adjacent locations to prevent
20 burglaries and "rip-offs" from rival criminal organizations. By having local marked police
21 units available, the likelihood of armed resistance is decreased.

22 9. During the operation, fifteen guns were seized, along with 38,212 marijuana plants, 114.9kg
23 processed marijuana, and \$100,891 in U.S. currency.

24 10. The information in this declaration is current and accurate as of June 8, 2018.

25 I declare, under penalty of perjury under 28 U.S.C. § 1746, that the foregoing is true and correct to the
26 best of my knowledge, information, and belief.

1 Executed in Sacramento, California on this 8th day of June 2018,

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5 Sir G. Streeter
6 Assistant Special Agent in Charge
7 Homeland Security Investigations
8 U.S. Immigration and Enforcement
9 U.S. Department of Homeland Security
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