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14 IN THE UNITED STATES DISTRICT COURT
 15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16 THE UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 THE STATE OF CALIFORNIA; EDMUND
 20 GERALD BROWN JR., Governor of
 California, in his official capacity; and
 21 XAVIER BECERRA, Attorney General of
 California, in his official capacity,

22 Defendants.
 23

Case No. 2:18-cv-00490-JAM-KJN

Hon. John A. Mendez

**DECLARATION OF ANGELICA
 SALAS IN SUPPORT OF MOTION
 TO INTERVENE OF THE
 CALIFORNIA PARTNERSHIP TO
 END DOMESTIC VIOLENCE AND
 THE COALITION FOR HUMANE
 IMMIGRANT RIGHTS**

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29 **pro hac vice application forthcoming*
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1 I, Angelica Salas, upon my personal knowledge, hereby submit this declaration pursuant
2 to 28 U.S.C. § 1746 and declare as follows:

3 1. I am the Executive Director of the Coalition for Humane Immigrant Rights
4 ("CHIRLA"). I have been employed by CHIRLA for 23 years.

5 2. CHIRLA is a non-profit corporation which has offices in Los Angeles,
6 Porterville, San Bernardino, and Sacramento. CHIRLA is a statewide immigrant rights
7 organization whose mission is to advance the human and civil rights of immigrants and refugees,
8 promote harmonious multi-ethnic and multi-racial human relations, and empower immigrants
9 and their allies to build a more just and humane society. CHIRLA was founded in 1986.

10 3. CHIRLA has approximately 13,000 members in communities across the State,
11 including in southern California, the Central Valley, and northern California. The majority of
12 our members are Latino. Many are immigrants, both documented and undocumented, but others
13 are citizens in mixed-status families (in which some members are documented or citizens and
14 others are not), recipients of Deferred Action for Childhood Arrivals (DACA), and citizen allies.

15 4. CHIRLA's members regularly meet with each other in regional committees.
16 Committee meetings can range from a small handful of people to hundreds. In addition, our
17 student members hold regional statewide conference calls and meetings throughout the year.
18 During these meetings, our members plan local advocacy campaigns, share information, and
19 discuss issues that are affecting them, their families, and their local communities. The main
20 takeaways from these meetings are then reported to CHIRLA's leadership and influence
21 CHIRLA's programmatic agenda. This reporting is how CHIRLA learns about the issues that
22 are affecting our members on the ground.

23 5. In addition to organizing our members, CHIRLA serves immigrant communities
24 in California in a number of other ways. We provide education in the form of know-your-rights
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1 trainings, workshops, and educational literature about a variety of immigration and public
2 benefits issues. We provide direct legal services ranging from help with asylum applications to
3 help applying for U visas, T visas, and protection under the Violence Against Women Act. We
4 mobilize our members to engage in advocacy, lobbying, and to tell their stories in the media. We
5 engage in direct political advocacy with legislators and local officials in California. And we run
6 a hotline where members can receive information and referrals to available legal services and
7 other resources.

9 6. Our services reach tens of thousands of Californians each year, including
10 members and non-members. For example, over the last three years, our education programs
11 have reached over 625,000 people. Our hotline fields over 18,000 calls per year. Our legal team
12 has assisted 25,000 people in the last three years. And during the same period, CHIRLA helped
13 immigrants with close to 10,000 DACA applications.

15 7. The California Values Act was one of our biggest legislative priorities in recent
16 years. Since local police started collaborating heavily with federal immigration officials in 2011
17 and 2012 by sharing information through Secure Communities, our members have increasingly
18 expressed fear of reporting crimes, serving as witnesses, and interacting with other government
19 agencies, like DMVs, public schools, and public hospitals. This fear has become much worse
20 under the stepped-up federal immigration enforcement since 2017, with immigrants and
21 members of mixed-status families terrified to make use of public services. The climate of fear
22 created by local-federal communication and collaboration is hard to overstate.

24 8. CHIRLA devoted major resources to advocating for the Values Act's enactment.
25 First, we engaged in direct advocacy with legislators, explaining to them how the Values Act
26 would help our members and make all Californians safer by ensuring that immigrant
27 communities feel secure working with police. We also organized lobby days, in which we
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1 brought up to 100 members to Sacramento to lobby for the Values Act. Second, we organized
2 grassroots advocacy amongst our members, so that they could share their stories with the public.
3 We coordinated rallies in favor of the bill and ran a call center to urge voters to call their senators
4 and representatives to express their support. Third, we engaged in extensive media work to
5 express our support for the bill. This involved talking to reporters, going on television and radio,
6 and putting out press releases to educate Californians about the need for this law.
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8 9. The Values Act is especially important to CHIRLA's members who have been
9 victims of crime. As our members have made abundantly clear to us, immigrant victims of crime
10 (or those in mixed-status families) are frequently too afraid of local police collaboration with
11 ICE to report crimes and take advantage of public resources for victims. That is especially true
12 for survivors of domestic violence ("DV") or sexual assault. For survivors, the fear is often not
13 only for themselves, but for family members and other loved ones, as those crimes often take
14 place in the home or in intimate relationships. The Values Act allows them to interact with the
15 police without fear that they could be deported or have their loved ones torn away from them.
16 Since the Values Act came into effect, we have heard through our member committees that
17 immigrants and mixed-status families are more confident in accessing public services.
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20 10. This increased willingness to interact with law enforcement has helped us serve
21 members who have experienced or witnessed crimes by providing legal services that are tailored
22 to their needs. Our legal staff helps immigrant crime victims apply for U visas, immigrant
23 trafficking victims apply for T visas, and immigrant victims of domestic violence apply for
24 protection through the Violence Against Women Act. The Values Act makes CHIRLA's work
25 easier in these regards by fostering trust of the law enforcement officials who are crucial to
26 pursuing these forms of immigration relief.
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1 11. If the Values Act was struck down, it would sow confusion and panic amongst
2 our members, and amongst other immigrants across California. Based on my experience prior to
3 the Values Act and what we have heard from our members, I expect that immigrant crime
4 reporting would plummet. As an example, as the federal government ramped up deportation
5 operations early last year, reporting of domestic violence amongst Latinas went down
6 dramatically in California. That effect has been widely reported, both within CHIRLA's
7 membership and in the news.¹ An injunction of the Values Act would have a similar effect for
8 our members. Indeed, every year numerous members are the victim of crimes, including DV and
9 sexual assault, and I expect that in the absence of the Values Act, members who would otherwise
10 report those crimes would be too afraid to do so. If they know that their police or other local
11 officials may report them to ICE and help bring about their deportation—or the deportation of
12 their loved ones—they will not come forward.

15 12. An injunction against the Values Act would also decrease morale amongst
16 CHIRLA's members, because it would signal to them that they do not have control over what
17 policies their state government pursues. After spending so much time and energy to hold our
18 state elected officials accountable, I fear that many members would become disillusioned with
19 state politics if they learned that the federal government could undo the State's choice to limit its
20 work with ICE. Members would also not know whom to hold accountable for overzealous or
21 arbitrary deportations, because the only people they have direct control over—their elected state
22 and local officials—would suddenly be unable to follow their instructions. This would be a
23 significant blow to CHIRLA's organizing and advocacy, which is based around holding elected
24 leaders accountable.

28 ¹ See, for example, Rob Arthur, *Latinos in Three Cities Are Reporting Fewer Crimes Since Trump Took Office*, FiveThirtyEight.com, May 18, 2017, <https://53eig.ht/2rjgs40>.

1 13. An injunction against the Values Act would also have a major effect on CHIRLA
2 itself as an organization. We would be forced to take resources from other services, organizing,
3 and civic engagement programs, and instead devote them to educating our members about their
4 interactions with local police and other government entities. We would hold know-your-rights
5 trainings workshops to address those interactions that we currently do not have to provide with
6 the Values Act in place. And we would have to divert resources to provide more legal services
7 to members who are detained because of increased police-ICE collaboration.
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9 14. Under the Values Act, a statewide policy governs local collaboration with ICE. If
10 the Values Act was struck down, all of a sudden a patchwork of local policies would govern
11 instead. CHIRLA would therefore be forced to reallocate staff time and resources to educate
12 members across the state about the wide range of local policies that govern in their region. We
13 would also have to devote energy and resources to educating elected officials and advocating
14 better local policies. We had to expend our time and resources on both of these tasks before the
15 Values Act took effect, and would need to do so again.
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17 15. A final effect on CHIRLA's work, if the Values Act was enjoined, is that I would
18 expect our hotline to receive many more calls than it currently does. Members would have many
19 new questions about what the injunction means and how they should protect themselves and their
20 families now that the Values Act no longer applies. This increased hotline activity would force
21 us to devote more staff time to answering calls and advising both members and non-members,
22 which would mean fewer resources to commit to other forms of program work, including legal
23 services, education, and civic engagement. Through our hotline and in our committee meetings
24 we would also have to counsel individuals who are victims and witnesses of crime as to how to
25 seek out police protection in jurisdictions that are collaborating with ICE.
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16. I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 4, 2018
Los Angeles, California



Angelica Salas
Executive Director
Coalition for Humane Immigrant Rights