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11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE EASTERN DISTRICT OF CALIFORNIA  
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14

15 **THE UNITED STATES OF AMERICA,**  
16  
17 **Plaintiff,**  
18 **v.**  
19 **THE STATE OF CALIFORNIA; EDMUND**  
20 **GERALD BROWN JR., Governor of**  
21 **California, in his official capacity; and**  
22 **XAVIER BECERRA, Attorney General of**  
23 **California, in his official capacity,**  
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27  
28 **Defendants.**

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

**DECLARATION OF JEFFREY F. ROSEN IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

Judge: Honorable John A. Mendez  
Action Filed: March 6, 2018

1 I, JEFFREY F. ROSEN, declare and state as follows:

2 1. I am the elected District Attorney of Santa Clara County. I have worked as a  
3 prosecutor for 22 years and was elected District Attorney in 2010.

4 2. I submit this Declaration in support of the State of California's opposition to the  
5 United States' motion for preliminary injunction. I have personal knowledge of the facts stated  
6 herein and, if called as a witness, I could testify to them competently under oath.

7 3. As District Attorney, my duty under California law is to oversee the prosecution of  
8 all state and local crimes within Santa Clara County. My office prosecutes cases involving a wide  
9 range of criminal activity, including but not limited to fraud, elder abuse, homicide, burglary,  
10 robbery, domestic violence, human trafficking, drug trafficking, rape, child molestation, gang  
11 violence, and high-tech crime.

12 4. I understand that in enacting the "California Values Act," (SB 54), the Legislature  
13 found that "[a] relationship of trust between California's immigrant community and state and  
14 local agencies is central to the public safety of the people of California" and that "[t]his trust is  
15 threatened when state and local agencies are entangled with federal immigration enforcement,  
16 with the result that immigrant community members fear approaching police when they are  
17 victims of, and witnesses to, crimes, seeking basic health services, or attending school, to the  
18 detriment of public safety and the well-being of all Californians." These findings are fully  
19 consistent with my experience as a District Attorney and prosecutor.

20 5. The District Attorney's Office did not enforce federal immigration law before SB  
21 54 and does not do so now. Nor does the District Attorney's Office ask about or track  
22 information on immigration status when it investigates and prosecutes state and local crimes. SB  
23 54 did not alter these practices either.

24 6. The mission of the District Attorney's Office is to investigate and prosecute cases  
25 in pursuit of justice on behalf of the People of the State of California. This pursuit is improved  
26 when people do not fear that their participation in a criminal prosecution will give rise to  
27 deportation or other adverse immigration consequences.

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