

1 XAVIER BECERRA
Attorney General of California
2 THOMAS PATTERSON
Senior Assistant Attorney General
3 MICHAEL NEWMAN
SATOSHI YANAI
4 Supervising Deputy Attorneys General
CHRISTINE CHUANG
5 ANTHONY HAKL
CHEROKEE DM MELTON
6 LEE I. SHERMAN
Deputy Attorneys General
7 State Bar No. 272271
300 S. Spring Street
8 Los Angeles, CA 90013
Telephone: (213) 269-6404
9 Fax: (213) 897-7605
E-mail: Lee.Sherman@doj.ca.gov
10 *Attorneys for Defendants*

11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE EASTERN DISTRICT OF CALIFORNIA
13
14

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

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

**SUPPLEMENTAL DECLARATION OF
CHEROKEE MELTON IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

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

24
25
26
27
28

1 I, Cherokee Melton, declare as follows:

2 1. I am a member of the California State Bar, admitted to practice before this Court,
3 employed by the Office of the California Attorney General as a Deputy Attorney General, and
4 counsel to Defendants in this action.

5 2. On May 4, 2018, I signed a declaration in support of Defendants' Opposition to
6 Plaintiff's Motion for Preliminary Injunction in the above captioned case and docketed on the
7 Court's electronic case filing system (ECF) as Document 74-2.

8 3. In paragraph 2 of that declaration, I stated that the Attorney General's Office
9 began visiting California detention facilities that hold civil immigration detainees, pursuant to AB
10 103. In paragraph 3, I listed the county-owned facilities that the Attorney General's Office had
11 visited as of February 2018. That list only included the five county-owned facilities that are used
12 by Immigration and Customs Enforcement (ICE). It did not include the Yolo County Juvenile
13 Detention Facility which, upon information and belief, contracts with the Office of Refugee
14 Resettlement to hold juvenile civil immigration detainees.

15 4. In order to correct the record for the Court and make clear that pursuant to AB 103
16 the Attorney General's Office has visited six county-owned civil immigration detention facilities
17 in total, I am submitting an amended declaration with corrections made to paragraph 3. I have
18 also changed the date of signing to today's date. I have not made any other changes to the
19 declaration I filed on May 4 in support of Defendants' Opposition to Plaintiff's Motion for
20 Preliminary Injunction nor have I made any changes to the exhibits attached to my declaration
21 filed on May 4.

22 I declare under penalty of perjury under the laws of the United States that the foregoing is
23 true and correct and that this declaration was executed on May 14, 2018 in Los Angeles,
24 California.

25
26 
27 CHEROKEE MELTON
28