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Attorneys For Plaintiff COUNTY OF SANTA CLARA

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14 COUNTY OF SANTA CLARA,  
15 Plaintiff,  
16 v.

17 DONALD J. TRUMP, President of the  
18 United States of America, JOHN F. KELLY,  
19 in his official capacity as Secretary of the  
20 United States Department of Homeland  
21 Security, DANA J. BOENTE, in his official  
22 capacity as Acting Attorney General of the  
23 United States, JOHN MICHAEL "MICK"  
MULVANEY, in his official capacity as  
Director of the Office of Management and  
Budget, and DOES 1-50,  
Defendants.

Case No. 5:17-cv-00574-WHO

**DECLARATION OF SANTA CLARA  
COUNTY DISTRICT ATTORNEY  
JEFFREY F. ROSEN**

Date: April 5, 2017  
Time: 2:00 p.m.  
Dept.: Courtroom 2  
Judge: Hon. William H. Orrick

Date Filed: February 3, 2017

Trial Date: Not yet set

1 I, JEFFREY F. ROSEN, hereby declare as follows:

2 1. I am the elected District Attorney of Santa Clara County. I make this declaration  
3 based on personal knowledge.

4 2. The District Attorney's Office serves a population of about 1.9 million. The  
5 District Attorney's Office has more than 550 employees, including 190 deputy district attorneys,  
6 and prosecutes approximately 40,000 cases each year.

7 3. As District Attorney, I oversee the prosecution of all state crimes within Santa  
8 Clara County. I have worked as a prosecutor for 22 years.

9 4. The mission of the District Attorney's Office is to investigate and prosecute cases  
10 in pursuit of justice. This pursuit is improved when people do not fear that their participation in a  
11 criminal prosecution will give rise to deportation or other adverse immigration consequences.

12 5. The District Attorney's Office does not ask about or formally track information on  
13 immigration status in the investigation or prosecution of state crimes.

14 6. Crimes happen in all communities. The whole community benefits when everyone  
15 in the community feels safe to report crimes, act as witnesses, and participate in trials.

16 7. In my experience, immigrants do not live in isolated, crime-ridden neighborhoods,  
17 nor do statistics indicate that they more likely to commit crimes than United States citizens.

18 8. Fear of deportation has ripple effects on entire communities and families. This is  
19 because families and communities are often made up of members with various immigration  
20 statuses, and families and communities may fear reporting crimes or serving as witnesses due to  
21 fear that an undocumented member may be deported.

22 9. As one example, fear of deportation often arises in the context of domestic  
23 violence cases, where abusers may use deportation as a threat to keep victims from reporting  
24 abuse to law enforcement, or where victims may not want to report abuse out of fear that the  
25 abuser (who is a co-parent and/or wage-earner) will be deported.

26 10. Undocumented individuals can report and help with the prosecution of crimes  
27 committed by those with lawful status.

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