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 CITY AND COUNTY OF SAN FRANCISCO

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

17 CITY AND COUNTY OF SAN
 18 FRANCISCO,

19 Plaintiff,

20 vs.

21 DONALD J. TRUMP, President of the United
 States, UNITED STATES OF AMERICA,
 22 JOHN F. KELLY, Secretary of United States
 Department of Homeland Security,
 23 JEFFERSON B. SESSIONS, Attorney General
 of the United States, DOES 1-100,

24 Defendants.

Case No. 3:17-cv-00485-WHO

**DECLARATION OF COMMANDER PETER
 WALSH IN SUPPORT OF CITY AND
 COUNTY OF SAN FRANCISCO'S MOTION
 FOR PRELIMINARY INJUNCTION**

Date: April 12, 2017
 Time: 2:00 p.m.
 Judge: Honorable William H. Orrick
 Dept: Courtroom 2

Date Filed: January 31, 2017

Trial Date: Not set

1 I, Peter Walsh, declare as follows:

2 1. I am a resident of the State of California. I have personal knowledge of the facts set
3 forth in this declaration and, if called as a witness, could and would testify competently to the matters
4 set forth below.

5 2. I am currently a Commander with the San Francisco Police Department (“SFPD”)
6 working as a Special Assistant to the Chief of Staff. In that role I oversee the Risk Management
7 Office as well as the operations and personnel in the Internal Affairs—Criminal Unit, Internal
8 Affairs—Administrative Unit, Body Camera Unit, Early Intervention Systems, and the Legal Division.
9 I am also responsible for keeping abreast of legislative issues and how federal and state laws might
10 affect SFPD.

11 3. I am a 25 year veteran of the SFPD. During my tenure with SFPD, I have served as an
12 officer at three District Stations—Park, Mission and Ingleside; have worked in various investigative
13 bureaus including Sex Crimes, Burglary, Special Investigations, and Internal Affairs; and was
14 promoted several times, including serving as Captain in the Risk Management Office. I have spent my
15 career interviewing victims and witnesses of crime and implementing community policing strategies.

16 4. I am familiar with San Francisco’s Sanctuary City laws—San Francisco Administrative
17 Code Sections 12H and 12I—and SFPD’s policies stemming from those laws. Those laws limit
18 sharing personal information in order to “foster respect and trust between law enforcement and
19 residents.” S.F. Admin. Code Section 12I.1.

20 5. I am also familiar with Executive Order 13768, dated January 25, 2017, and titled
21 “Enhancing Public Safety in the Interior of the United States” (the “Executive Order”).

22 6. Fostering trust and confidence between law enforcement and the community is vitally
23 important to SFPD. Without it, residents do not feel comfortable reporting crimes, serving as
24 witnesses, or assisting in investigations, thus harming San Francisco as a whole and making it
25 impossible for SFPD to effectively protect and serve its residents.

26 7. SFPD has dedicated significant time and resources to building bridges into
27 communities in San Francisco and encouraging a mutual respect between law enforcement and
28 members of the community. For years, San Francisco has been using various “community policing”

1 strategies, aimed at “creat[ing] safer communities, address[ing] the root causes of violence, and
2 preserv[ing] healthy and vibrant neighborhoods in San Francisco.” S.F. Admin. Code Section 2A.83.
3 These ties have been integral to reducing, preventing, and responding to crime—aiding victims and
4 witnesses, improving public safety, and making people feel safe contacting law enforcement. They
5 make San Francisco as a city, safer.

6 8. Yet despite SFPD’s community policing strategies and the relationships that have been
7 building for decades, the Executive Order has eroded some of the community’s trust in SFPD. San
8 Franciscans are scared. SFPD is noticing a reluctance to talk to law enforcement and fear and
9 confusion surrounding SFPD’s relationship with the United States Immigration and Customs
10 Enforcement (“ICE”).

11 9. In addition, instances of actual and suspected ICE activity in San Francisco, combined
12 with statements from the Trump administration suggesting that local governments must cooperate with
13 ICE or face possible enforcement, and the administration’s references to San Francisco as a Sanctuary
14 City, compound the confusion and fear.

15 10. San Francisco’s Sanctuary City laws have helped people feel a level of comfort
16 reaching out to police and other law enforcement. The largest group benefitted by the Sanctuary City
17 laws are victims of crime, who trust that they can report a crime without fear that their involvement
18 will lead to their removal.

19 I declare under penalty of perjury that the foregoing is true and correct and that this declaration
20 was executed on March 7, 2017 at San Francisco, California.

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24 COMMANDER PETER WALSH