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 CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

CITY AND COUNTY OF SAN
 FRANCISCO,

Plaintiff,

vs.

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

Defendants.

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

**DECLARATION OF COLLEEN CHAWLA 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, Colleen Chawla, 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 the Deputy Director of Health and Director of Public Policy and Planning for the
6 San Francisco Department of Public Health ("SFPDH"). SFPDH's Office of Policy and Planning
7 monitors, researches, and analyzes public health data, information, and policy; produces public health
8 reports and policy briefs; advocates on behalf of consumers and their health needs; identifies emerging
9 needs and issues and develops strategic plans; recommends and implements improvements to public
10 policy actions through legislation, policies, plans and programs; and staffs, coordinates, and/or leads
11 public health projects, partnerships, and initiatives.

12 3. In my current position I am responsible for (1) coordinating all government relations
13 for SFPDH including interacting with the San Francisco Health Commission (a governing and policy
14 making body of SFPDH), the San Francisco Board of Supervisors, and state and federal governmental
15 agencies; (2) working on citywide health planning and cross-divisional work; and (3) the creation and
16 dissemination of SFPDH policies. I have held these positions for the last 7 years. Prior to becoming
17 Deputy Director, I worked as a governmental relations executive for two private companies, and
18 served as the Assistant Director of Policy and Planning for SFPDH.

19 4. I am familiar with San Francisco's Sanctuary City laws—San Francisco Administrative
20 Code Sections 12H and 12I—as well as SFPDH's policies stemming from these laws. SFPDH uses
21 those laws and policies as tools to encourage San Francisco's residents to feel safe and comfortable
22 accessing medical and mental health treatment. SFPDH's vision is to promote and protect the health
23 and well-being of all San Franciscans. In order to do that thoroughly and effectively, residents must
24 access health services. SFPDH expends significant resources engaging with the community to build a
25 relationship of trust with patients and family members, using all lawful tools to protect our clients'
26 confidential personal information.

27 5. Yet, Executive Order 13768, dated January 25, 2017, and titled "Enhancing Public
28 Safety in the Interior of the United States" (the "Executive Order") threatens that trust and safety.

1 6. Since the issuance of the Executive Order, members of the public as well as SFDPH
2 employees have expressed fear and anxiety; fear that if SFDPH is forced to give personal information
3 to the United States Immigration and Customs Enforcement ("ICE") that it will erode the trust that
4 SFDPH has taken such care to build, discourage individuals from accessing health care, and further
5 destabilize communities.

6 7. Since the Executive Order issued, three SFDPH clinics located in the Mission have
7 reported a drop in patient visits, indicating that patients were frightened and scared to access health
8 services. In a Town Hall meeting on November 22, 2016, SFDPH employees expressed not only fear
9 for their clients and patients, but for themselves if San Francisco is compelled to abandon its Sanctuary
10 City laws.

11 8. In response to this fear and uncertainty, SFDPH has expended significant time and
12 resources to reassure San Franciscans of SFDPH's commitment to confidentiality and to eliminating
13 barriers to health care.

14 9. For example, since issuance of the Executive Order, SFDPH has put out a presentation
15 titled, "Post-Election Sanctuary City" a public information campaign designed to explain how
16 San Francisco's Sanctuary City laws and SFDPH's policies work together, and what San Francisco is
17 doing to safeguard personal information.

18 10. SFDPH's mission is to protect and promote the health of all San Franciscans but it can
19 only do so if community members feel like they can trust the Department enough to access needed and
20 preventative health services.

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

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24 

25
26 COLLEEN CHAWLA