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Attorneys for Los Angeles County (ADDA)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

ASSOCIATION OF DEPUTY DISTRICT
ATTORNEYS FOR LOS ANGELES
COUNTY (ADDA),

Petitioner,

v.

GEORGE GASCÓN, LOS ANGELES
COUNTY DISTRICT ATTORNEY; LOS
ANGELES COUNTY DISTRICT
ATTORNEY'S OFFICE; COUNTY OF
LOS ANGELES; DOES 1 through 50,
inclusive,

Respondents.

Case No. 21STCP03412

**DECLARATION OF JACQUELYN
LACEY IN SUPPORT OF
PETITIONER'S POINTS AND
AUTHORITIES IN REPLY TO
RESPONDENTS' OPPOSITION TO
OSC RE: PRELIMINARY
INJUNCTION**

Date: November 10, 2021
Time: 9:30 a.m.
Place: Dept. 86

1 **DECLARATION OF JACQUELYN LACEY**

2 I, Jacquelyn Lacey, hereby declare as follows:

3 1. I am not a party to the above entitled action. I make this declaration based upon
4 my own personal knowledge of the facts set forth herein.

5 2. I was the Los Angeles County District Attorney from 2012 until 2020. Prior to
6 being the elected District Attorney, I was the Chief Deputy for the Los Angeles District
7 Attorney’s Office for one year. Prior to that, I served as an Assistant District Attorney. Prior to
8 that I was the Director of Specialized Prosecution. Prior to that assignment I was the Director of
9 Central Operations. All of these positions involved participating in transfer and promotion
10 decisions.

11 3. Prior to being in management, I served as a Deputy District Attorney I, II, III, and
12 IV. Before being hired as a Deputy District Attorney Grade I, I served as a city attorney for the
13 City of Santa Monica.

14 4. As the District Attorney and the Chief Deputy, I had oversight responsibilities for
15 all personnel decisions within the Office.

16 5. During my tenure as District Attorney and Chief Deputy, there were no lateral
17 transfers of deputy public defenders or alternate public defenders into the position of deputy
18 district attorney.

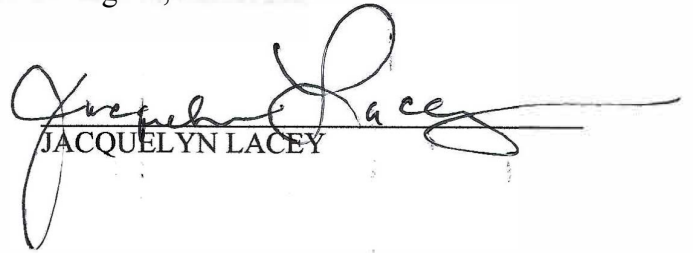
19 6. The lack of any lateral transfers of deputy public defenders or deputy alternate
20 public defenders into positions of deputy district attorneys for the past 15 years is because the
21 skill sets for public defenders and alternate public defenders are different than those of
22 prosecutors. They are not similarly situated professionals.

23 7. The only manner in which an employee of the Public Defender’s Office or the
24 Alternate Public Defender’s Office is able to demonstrate that they possess the skills and
25 aptitudes required to perform the duties of a deputy district attorney, is for them to start in the
26 Office as a new hire, at Grade I, and establish their skills to the satisfaction of their supervisors
27 in the office. To demonstrate their possession of the skills and aptitudes necessary to hold the
28 positions of DDA III or IV, they must additionally successfully pass the promotional

1 examination for each such rank.

2 I declare under penalty of perjury the foregoing is true and correct.

3 Sworn this 2nd day of November, 2021 at Los Angeles, California.

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6 JACQUELYN LACEY
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1 PROOF OF SERVICE

2 STATE OF CALIFORNIA)
3 COUNTY OF LOS ANGELES) ss.

4 I am a citizen of the United States; I am over the age of eighteen years and not a
5 party to the within action; my business address is 811 Wilshire Boulevard, 17th Floor, Los
6 Angeles, California 90017.

7 On the date written below, I served the within:

8 **DECLARATION OF JACQUELYN LACEY IN SUPPORT OF**
9 **PETITIONER'S POINTS AND AUTHORITIES IN REPLY TO**
10 **RESPONDENTS' OPPOSITION TO PETITIONER'S MOTION FOR**
11 **PRELIMINARY INJUNCTION**
12 *Association of Deputy District Attorneys for Los Angeles County (ADDA) v.*
13 *George Gascón, Los Angeles County District Attorney, et al.*
14 LASC Case No. 21STCP03412

15 on the interested parties in said action as follows:

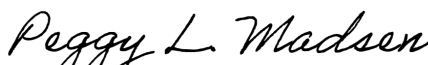
16 Justin H. Sanders (SBN 211488)
17 jsanders@sandersroberts.com
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20 Shawn P. Thomas (SBN 302593)
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24 **SANDERS ROBERTS LLP**
25 1055 West 7th Street, Suite 3200
26 Los Angeles, CA 90017

27 **BY MAIL:** I am readily familiar with the firm's practice of collection and
28 processing correspondence by mailing. Under that practice, it would be deposited with the U.S.
Postal Service on that same day with postage fully prepared at Los Angeles, California in the
ordinary course of business. I am aware that on motion of the party served, service is presumed
invalid if postal cancellation date or postage meter date is more than one day after date of deposit
for mailing in affidavit.

BY ELECTRONIC MAIL (E-MAIL): I transmitted the document(s) via
electronic mail using web mail through the electronic mail server gmail.com and no error was
reported by the mail administrator. Pursuant to California Rules of Court, Rule 2006(d), I
printed the confirmation of the e-mail transmission.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 3, 2021 at Los Angeles, California.


Peggy Madsen