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**GEORGE GASCON; LOS ANGELES**  
9 **COUNTY DISTRICT ATTORNEY; LOS**  
10 **ANGELES COUNTY DISTRICT AND**  
11 **COUNTY OF LOS ANGELES**



11 SUPERIOR COURT OF CALIFORNIA  
12 COUNTY OF LOS ANGELES

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

17 Petitioner,

18 v.

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

21 Respondents.  
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**CASE NO. 21STCP03412**

**DECLARATION OF STANLEY YEN IN  
SUPPORT OF RESPONDENTS'  
OPPOSITION TO PETITIONER'S  
MOTION FOR PRELIMINARY  
INJUNCTION**

Judge: Hon. Mitchell L. Beckloff  
Dept.: 86

Complaint Filed: October 12, 2021  
Trial Date: TBD

**DECLARATION OF STANLEY YEN**

I, Stanley Yen, declare as follows:

1. I am the Personnel Officer of the Deputy Los Angeles County District Attorney’s (DA) Office and I have served in that capacity since July 1, 2020.

2. As part of my duties as the Personnel Officer, I am responsible for administering a comprehensive integrated personnel program to support the service and operational needs for the DA’s Office.

3. On March 31, 2020, due to the COVID-19 global pandemic, the Los Angeles County Board of Supervisors implemented a hard-hiring freeze, excluding critical health and safety positions as determined by the Chief Executive Office (“CEO”). The Deputy District Attorney and Deputy Public Defender classifications were not exempt from the hard-hiring freeze and therefore the CEO must approve the submitted Exception to the Hiring Freeze for any transfers or promotions to the DA’s Office. Transfers and promotions were two ways to fill a vacant position (absent an exception to the freeze) within these departments during the hard hiring freeze.

4. It is not unusual for the County to make lateral transfers between departments.

5. The DA’s Office submitted several transfers and promotional requests to the CEO between December 2020 and the Los Angeles County Board of Supervisors’ lifting of the hard-hiring freeze on October 5, 2021. Below is a timeline of those requests and how they were handled.

6. On or about December 2020, the DA’s Office consulted with the CEO, Department of Human Resources (DHR), and County Counsel to transfer an employee from the Public Defender’s (PD) Office holding the unclassified classification of Constitutional Advisor. DHR denied this request because the DA’s Office did not have a comparable Constitutional Advisor position.

7. Following DHR’s denial of the request, the PD’s Office loaned its Constitutional Advisor to the DA’s Office. Indeed, the Constitutional Advisor is still currently on loan to the DA’s Office. Because the Constitutional Advisor was only loaned to the DA’s Office, the Constitutional Advisor is still technically employed with the PD’s Office. In this loan arrangement, the DA’s Office does not have access to any information for which that the Constitutional Advisor may have access to with respect to the PD’s Office. This includes, for example, timecards and performance evaluations





1 as these would have to be generated from the PD's Office. The DA's Office reimburses the PD's  
2 Office for expenses associated with the Constitutional Advisor, including the associated salary and  
3 benefits.

4 8. Thereafter, in late December of 2020, the DA's Office consulted with CEO, DHR, and  
5 County Counsel to transfer Deputy Public Defender (DPD) III, Alisa Blair, to serve as a special  
6 advisor to the DA in the capacity of Deputy District Attorney (DDA) III. DHR reviewed and  
7 approved the administrative reassignment to the DA's Office as it was appropriate under Civil  
8 Service Rules 15.03. DHR determined the DPD III and DDA III classes are of the same rank, there  
9 is no increase in grade, and the employee demonstrated the possession of the skills and aptitudes  
10 required in the position to be changed. The CEO also approved the Exception to Hire for the transfer.  
11 The transfer was not based on merit (i.e. civil service exam), but rather, based on the employee's  
12 experience and the needs of the DA's Office. Non-promotional inter-department transfers and  
13 change in classification such as a DPD III to DDA III does not require a County employee to take a  
14 competitive civil service examination to effect the transfer. The transfer became effective on January  
15 4, 2021.

16 9. Also in late December of 2020, the DA's Office consulted with CEO, DHR, and County  
17 Counsel to transfer DPD IV, Tiffany Blacknell, to serve as a special advisor to the DA in the capacity  
18 of DDA IV. DHR reviewed and approved the administrative reassignment to the DA's Office as it  
19 was appropriate under Civil Service Rules 15.03. DHR determined the DPD IV and DDA IV classes  
20 are of the same rank, there is no increase in grade, and the employee demonstrated the possession  
21 of the skills and aptitudes required in the position to be changed. The CEO also approved the  
22 Exception to Hire for the transfer. The transfer was not based on merit (i.e. civil service exam), but  
23 rather, based on the employee's experience and the needs of the DA's Office. Non-promotional  
24 inter-department transfers and change in classification such as a DPD IV to DDA IV does not require  
25 a County employee to take a competitive civil service examination to effect the transfer. The transfer  
26 became effective on March 1, 2021.

27 10. Also in late December of 2020, the DA's Office consulted with CEO, DHR, and County  
28 Counsel to transfer DPD IV, Shelan Joseph, to serve as a special advisor to the DA in the capacity



1 of DDA IV. DHR reviewed and approved the administrative reassignment to the DA’s Office as it  
2 was appropriate under Civil Service Rules 15.03. DHR determined the DPD IV and DDA IV classes  
3 are of the same rank, there is no increase in grade, and the employee demonstrated the possession  
4 of the skills and aptitudes required in the position to be changed. The CEO also approved the  
5 Exception to Hire for the transfer. The transfer was not based on merit (i.e. civil service exam), but  
6 rather, based on the employee’s experience and the needs of the DA’s Office. Non-promotional  
7 inter-department transfers and change in classification such as a DPD IV to DDA IV does not require  
8 a County employee to take a competitive civil service examination to effect the transfer. The transfer  
9 became effective on April 1, 2021.

10 11. On or about August 2021, the DA’s Office submitted an Exception to Hire request to the  
11 CEO for the promotion of 30 DDA IVs from the DDA IV Eligible List (a competitive civil service  
12 examination). All candidates on the DDA IV Eligible List are employees with the DA’s Office. The  
13 CEO reviewed and approved 15 of the requested 30 promotions. The DA’s Office promoted 15  
14 candidates from the eligible list to the DDA IV position effective September 1, 2021.

15 12. On October 5, 2021, the Los Angeles County Board of Supervisors lifted the hard-hiring  
16 freeze.

17 13. After the lifting of the hard-hiring freeze, the DA’s Office announced the promotion of 52  
18 candidates from the DDA III Eligible List (a competitive civil service examination) to the position  
19 of DDA III. All candidates on the DDA III Eligible List are employees with the DA’s Office. The  
20 promotions will be effective November 1, 2021.

21 14. While the term “DDA V” has been used in some communications within the DA’s Office,  
22 such a classification does not actually exist in practice. In practice, the term “DDA V” refers to the  
23 classification of Head Deputy District Attorney.

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

Executed this 29th day of October 2021, in Los Angeles, California.

Digitally signed by Stanley Yen  
DN: CN = Stanley Yen email = syen@da.lacounty.gov  
C = US O = Administrative Services Bureau OU =  
Human Resources Division  
Date: 2021.10.29 16:00:00 -0800  
**Stanley Yen**  
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Declarant, Stanley Yen





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**SERVICE LIST**

*ADDA vs. George Gascon, et al.*  
LASC Case No.: 21STCP03412

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