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

12 SUPERIOR COURT OF CALIFORNIA

13 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
20 COUNTY DISTRICT ATTORNEY; LOS
21 ANGELES COUNTY DISTRICT
22 ATTORNEY'S OFFICE; COUNTY OF LOS
ANGELES, DOES 1 through 50, inclusive,

23 Respondents.

CASE NO. 21STCP03412

**DECLARATION OF SHEILA WILLIAMS
IN SUPPORT OF RESPONDENTS'
OPPOSITION TO MOTION FOR
PRELIMINARY INJUNCTION**

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

Complaint Filed: October 12, 2021
Trial Date: TBD



DECLARATION OF SHEILA WILLIAMS

I, Sheila Williams, declare under penalty of perjury that the following is true and correct:

1. I have been employed with the County of Los Angeles since 1994. In that time, I have held various positions based in budget and finance. Currently, I am Senior Manager, for the Chief Executive Office (CEO) of the County of Los Angeles (“County”). I have held this position since 2014. As Senior Manager, I oversee the budget for County departments within the Public Safety Cluster, which includes the following departments: Sheriff, Fire, Coroner, LA-RICS, Animal Care and Control, Agriculture, Weights and Measures, Probation, Trial Courts Grand Jury, District Attorney, Public Defender, and Alternate Public Defender. I overseeing the planning and evaluation of Public Safety Cluster departmental budgets, implementing fiscal controls, and developing financial and budget recommendations, reports and strategies. In addition, I am responsible for management of the Department of Justice issues dealing with suicide in the jails and coordinating the oversight of the diversion programs aimed at reducing recidivism and the jail population throughout the County. In this capacity, I serve as a direct liaison working closely with the County Board of Supervisors and other governmental jurisdictions, community partners and stakeholders. Prior to my role as Senior Manager, I was the Budget Manager over the County’s Public Safety Cluster, with the same budget oversight duties described above. I have personal knowledge of the matters set forth herein and, if called to do so, could and would testify competently thereto, except as to those matters based on information and belief, and as to those matters, I believe them to be true.

2. A position or “item” for a salaried employee within the Public Safety Cluster is assigned a Payroll Title for budgeting and payroll classification purposes. Generally, the Payroll Title for an employee who transfers between departments within the Public Safety Cluster does not change if (1) the employee’s salary does not change and (2) the new role involves the same general skill set as the employee’s prior role. However, the Payroll Title does not determine the employee’s duties in his or her new role; to whom he or she reports; or other indicia of departmental employment. In other words, the Payroll Title is simply a line-item within the County’s budget for the purpose of processing payroll. Typically, while serving in his or her new role, the employee has



1 no contact with his or her prior departmental employer and the new department is considered to be
2 his or her current employer. He or she is provided a new employee identification card and email
3 account and access only to his or her current department’s network and systems. Except for the
4 payroll classification, the employee’s ties to his or prior departmental employer are completely
5 severed.

6 3. Similarly, the County often utilizes a “loan/borrow” arrangement between
7 departments, again, for budgetary reasons. This usually occurs where a department is short-staffed
8 of employees with a particular skillset and one department “borrows” (the “borrowing department”)
9 an employee from another department (the “loaning department”) to fulfill that need. The borrowing
10 department typically reimburses the loaning department the cost of the employee’s salary and
11 benefits on a monthly basis. Thus, the borrowing department submits the employee’s timesheets to
12 the loaning department for processing, and the loaning department then invoices the borrowing
13 department for the reimbursement. This arrangement is governed by an interdepartmental Direct
14 Service Order (DSO), which tracks the flow of funding between the departments countywide. A
15 Memorandum of Understanding (MOU) may also be utilized if no reimbursement is required,
16 however, no MOU or DSO is required. Under either scenario, the loaned employee is considered to
17 be only the employee of the borrowing department for all purposes other than the source of his or
18 her salary and benefits. Again, the employee has no contact with his or her prior departmental
19 employer and the new department is considered to be his or her current employer. He or she is
20 provided a new employee identification card and email account and access only to his or her current
21 department’s network and systems.

22 4. Transfers between county departments are not unusual and happen frequently.
23 Transfers can be conducted at the request of the employee or facilitated by the County of Los
24 Angeles. Interdepartmental transfers are effective within 30 days upon request for a release date in
25 accordance with Civil Service Rule 15.02. Employees are transferred to either a budgeted and
26 available similar item or classification or to an item or classification within 2.5 percent of their
27 existing salary. In this case, the employees were transferred to an equivalent classification with no
28 impact to their current salary.



1 5. On October 28, 2021, I conducted a search of our records to determine the
2 employment history of Alisa Blair, Tiffany Blacknell and Shelan Joseph. Herein is a description of
3 each attorney’s employment history since 2012. Unfortunately, our current human resources system
4 was not in existence until 2012, so I was unable to obtain any information prior to 2012.

5 6. A search revealed that Alisa Blair was assigned to Deputy Public Defender Grade II
6 as of April 1, 2012. On December 1, 2014, Ms. Blair was promoted to Deputy Public Defender
7 Grade III. On January 4, 2021, Ms. Blair was transferred as a Deputy District Attorney Grade III.

8 7. For all purposes, Ms. Blair is considered to be an employee of the District Attorney’s
9 Office where she works on a full-time basis. She has access only to the District Attorney’s network
10 and systems; has a District Attorney Office employee identification card, email account, and
11 building keycard access. 100% of her current job duties are in service to the District Attorney’s
12 Office. By contrast, Ms. Blair no longer has a Public Defender email account or access to its network
13 and systems.

14 8. Our system shows that Tiffany Blackwell was assigned to Deputy Public Defender
15 Grade III as of April 1, 2012. On July 1, 2019, Ms. Blair was promoted to Deputy Public Defender
16 Grade IV. On March 1, 2021, Ms. Blair was transferred as a Deputy District Attorney Grade IV.

17 9. For all purposes, Ms. Blacknell is considered to be an employee of the District
18 Attorney’s Office where she works on a full-time basis. She has access only to the District
19 Attorney’s network and systems; has a District Attorney Office employee identification card, email
20 account, and building keycard access. 100% of her current job duties are in service to the District
21 Attorney’s Office. By contrast, Ms. Blacknell no longer has a Public Defender email account or
22 access to its network and systems.

23 10. Our system shows that Shelan Joseph was assigned to Deputy Public Defender Grade
24 IV as of April 1, 2012. On April 1, 2021, Ms. Joseph was transferred as a Deputy District Attorney
25 Grade IV.

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SERVICE LIST

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

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