	1 2 3 4 5 6 7 8 9 10	Justin H. Sanders (SBN 211488) jsanders@sandersroberts.com Sabrina C. Narain (SBN 299471) snarain@sandersroberts.com Shawn P. Thomas (SBN 302593) sthomas@sandersroberts.com Matthew D. Barzman (SBN 309063) mbarzman@sandersroberts.com SANDERS ROBERTS LLP 1055 West 7th Street, Suite 3200 Los Angeles, CA 90017 Telephone: (213) 426-5000 Facsimile: (213) 234-4581 Attorneys for Respondents GEORGE GASCON; LOS ANGELES COUNTY DISTRICT ATTORNEY; LOS ANGELES COUNTY DISTRICT AND COUNTY OF LOS ANGELES	
	11	SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES	
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DSTATUTION OF THE CARDINAL CONTRACT OF THE CAR	13	COUNTIONE	OS ANGELES
	14 15	ASSOCIATION OF DEPUTY DISTRICT	CASE NO. 21STCP03412
	15	ATTORNEYS FOR LOS ANGELES COUNTY (ADDA),	DECLARATION OF SHEILA WILLIAMS IN SUPPORT OF RESPONDENTS'
	17	Petitioner,	OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION
	18	V.	Judge: Hon. Mitchell L. Beckloff
	19	ANGELES COUNTY DISTRICT Complaint Filed: October 12, 2021	Complaint Filed: October 12, 2021
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		- 1 - DECLARATION OF SHEILA WILLIAMS IN SUP	
	MOTION FOR PRELIMINARY INJUNCTION		

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DECLARATION OF SHEILA WILLIAMS

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

3 1. I have been employed with the County of Los Angeles since 1994. In that time, I 4 have held various positions based in budget and finance. Currently, I am Senior Manager, for the 5 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 6 7 Safety Cluster, which includes the following departments: Sheriff, Fire, Coroner, LA-RICS, Animal 8 Care and Control, Agriculture, Weights and Measures, Probation, Trial Courts Grand Jury, District 9 Attorney, Public Defender, and Alternate Public Defender. I overseeing the planning and evaluation of Public Safety Cluster departmental budgets, implementing fiscal controls, and developing 10 11 financial and budget recommendations, reports and strategies. In addition, I am responsible for 12 management of the Department of Justice issues dealing with suicide in the jails and coordinating 13 the oversight of the diversion programs aimed at reducing recidivism and the jail population 14 throughout the County. In this capacity, I serve as a direct liaison working closely with the County 15 Board of Supervisors and other governmental jurisdictions, community partners and stakeholders. 16 Prior to my role as Senior Manager, I was the Budget Manager over the County's Public Safety 17 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 18 19 as to those matters based on information and belief, and as to those matters, I believe them to be 20 true.

2. 21 A position or "item" for a salaried employee within the Public Safety Cluster is 22 assigned a Payroll Title for budgeting and payroll classification purposes. Generally, the Payroll 23 Title for an employee who transfers between departments within the Public Safety Cluster does not 24 change if (1) the employee's salary does not change and (2) the new role involves the same general 25 skill set as the employee's prior role. However, the Payroll Title does not determine the employee's 26 duties in his or her new role; to whom he or she reports; or other indicia of departmental 27 employment. In other words, the Payroll Title is simply a line-item within the County's budget for 28 the purpose of processing payroll. Typically, while serving in his or her new role, the employee has - 2 -Case No.: 21STCP03412



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

SANDERS SOUTH STREET SUITE 3200 LOS ANGELES, CA 90017

3. Similarly, the County often utilizes a "loan/borrow" arrangement between 6 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 department typically reimburses the loaning department the cost of the employee's salary and 10 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.

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

- 3 -

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

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

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

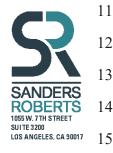
Our system shows that Tiffiny Blackwell was assigned to Deputy Public Defender
 Grade III as of April 1, 2012. On July 1, 2019, Ms. Blair was promoted to Deputy Public Defender
 Grade IV. On March 1, 2021, Ms. Blair was transferred as a Deputy District Attorney Grade IV.

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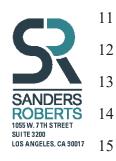
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For all purposes, Ms. Joseph is considered to be an employee of the District
 Attorney's Office where she works on a full-time basis. Her has access only to the District
 Attorney's network and systems; has a District Attorney Office employee identification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

8 I declare under penalty of perjury, under the laws of the State of California, that the
9 foregoing is true and correct and that this Declaration was executed on October 28, 2021 at
10 Cerritos, California.

Sheila Williams Digitally signed by Sheila Williams Date: 2021.10.28 14:57:04 -07'00' By:

Sheila Williams





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- 5 -

	1	PROOF OF SERVICE	
	2	STATE OF CALIFORNIA, COUNTY OF LOS ANGELES	
	3	I, Blanca Reyes am a citizen of the United States, over 18 years of age and am not a party to the within action. My business address is 1055 W. 7 th Street, Suite 3200, Los Angeles,	
	4	CA 90017, which is located in the County of Los Angeles where the service took place. My electronic service address is: breyes@sandersroberts.com.	
	5	On October 29, 2021 I served the foregoing document(s) described as:	
	6	DECLARATION OF SHEILA WILLIAMS IN SUPPORT OF RESPONDENTS'	
	7	OPPOSITION TO PETITIONER'S MOTION FOR PRELIMINARY INJUNCTION	
	8 9	on all interested parties in this action by placing a true and correct copy thereof enclosed in a sealed envelope addressed as stated in the attached service list:	
	10	<u>VIA MAIL</u> I am readily familiar with this office's practice for collection and processing	
	11	of correspondence for mailing with the U.S. Postal Service. Per that practice the within correspondence will be deposited with the U.S. Postal Service on the same day shown on this affidavit in a sealed envelope with postage fully prepaid in the ordinary course of	
	12	business.	
\mathbf{Q}	13	<u>VIA FACSIMILE</u> I caused such document to be transmitted via facsimile to the addressee(s) from the facsimile machine of Sanders Roberts LLP whose fax number is	
SANDERS SOLVERT US WARTH STREEL US ANGELES, CA 300T	14	(213) 234-4581. No error was reported by the machine and pursuant to Rule 2008(e)(3), I caused the machine to print a record of the transmission.	
	15	VIA ELECTRONIC MAIL I caused a PDF version of the documents to be transmitted	
	16	by electronic mail to the party(s) identified on the attached service list using the e-mail address(es) indicated, per their stipulation. I did not receive, within a reasonable time	
	17	after transmission, any electronic message or other indication that the transmission(s) were unsuccessful.	
	18	<u>VIA PERSONAL SERVICE</u> I caused such envelope(s) to be delivered by a process server employed by Express Network the attached documents to the office(s) of the	
	19	addressee.	
	20	<u>VIA OVERNIGHT DELIVERY (FEDERAL EXPRESS)</u> I caused the attached document(s) to be delivered via overnight delivery to the recipients shown on the	
	21 22	attached service list.	
	22	I declare under penalty of perjury that the foregoing is true and correct. Executed on	
	23	October 29, 2021, at Los Angeles, California.	
	25		
	26	<u>/s/ Blanca Reyes</u> Blanca Reyes	
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	28		
		CERTIFICATE OF SERVICE	

