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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 RODNEY COLLINS  
IN SUPPORT OF RESPONDENTS'  
OPPOSITION TO MOTION FOR  
PETITIONER'S PRELIMINARY  
INJUNCTION**

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

Complaint Filed: October 12, 2021  
Trial Date: TBD



1 I, Rodney Collins, declare as follows:

2 1. I am the Assistant Director of the Los Angeles County Department of Human  
3 Resources, and I have served in that capacity since July 2020. Prior to that, I held the position of  
4 Senior Human Resources Manager (2016 - July 2020) and Senior Advocate (2006 - 2016). I have  
5 personal knowledge of the matters set forth herein and, if called to do so, could and would testify  
6 competently thereto, except as to those matters based on information and belief, and as to those  
7 matters, I believe them to be true.

8 2. As part of my duties as the Assistant Director of the Los Angeles County Department  
9 of Human Resources (“DHR”), I am responsible for Countywide Talent Assessment Division,  
10 Workforce Employee Development, Talent Solutions Division. Each of the divisions I manage work  
11 to create employment opportunities and to develop a ready and able workforce. Additional  
12 responsibilities include assisting departments with various personnel requests and supporting special  
13 projects as necessary.

14 3. Pursuant to Civil Service Rule 15.03, the Los Angeles County District Attorney’s  
15 Office (the “District Attorney's Office”) requested that Tiffiny Townend Blacknell (“Ms.  
16 Blacknell”) be reclassified from Deputy Public Defender IV to Deputy District Attorney IV. I  
17 analyzed this request based on the civil service rules and requirements. Specifically, I analyzed 1)  
18 whether the reclassification was to a class of the same rank and grade; 2) whether Ms. Blacknell has  
19 demonstrated possession of the skills and aptitudes required in the position of Deputy District  
20 Attorney IV; and 3) whether there were any significant issues of concern with Ms. Blacknell’s  
21 current performance in the position of Deputy Public Defender IV.

22 4. On December 21, 2020, I recommended approval of the request to change the  
23 classification on the basis that Mr. Blacknell’s reclassification from Deputy Public Defender IV to  
24 Deputy District Attorney IV would be a reclassification to a position of the same rank and grade;  
25 that Ms. Blacknell demonstrated possession of the skills and aptitudes required in the position of  
26 Deputy District Attorney IV; and that there were no significant issues of concern with Ms.  
27 Blacknell’s current performance in the position of Deputy Public Defender IV. A true and correct  
28



1 copy of a memo, dated December 21, 2020, setting forth my analysis and recommendations  
2 regarding the reclassification of Ms. Blacknell is attached hereto as Exhibit 1.

3 5. The Director of Human Resources, Lisa Garrett, approved the request to reclassify  
4 Ms. Blacknell.

5 6. After DHR approved the request, the District Attorney's Office transferred Ms.  
6 Blacknell from her position as a Deputy Public Defender IV to the position Deputy District Attorney  
7 IV. Similarly, the District Attorney's Office transferred other Deputy Public Defenders to the  
8 equivalent Deputy District Attorney positions. At the time, the District Attorney's Office did not  
9 deny any promotions to any other Deputy District Attorneys.

10 7. Pursuant to Civil Service Rule 15.03, the District Attorney's Office requested that  
11 Shelan Joseph ("Ms. Joseph") be reclassified from Deputy Public Defender IV to Deputy District  
12 Attorney IV. I analyzed this request based on the civil service rules and requirements. Specifically,  
13 I analyzed 1) whether the reclassification was to a class of the same rank and grade; 2) whether Ms.  
14 Joseph has demonstrated possession of the skills and aptitudes required in the position of Deputy  
15 District Attorney IV; and 3) whether there were any significant issues of concern with Ms. Joseph's  
16 current performance in the position of Deputy Public Defender IV.

17 8. I recommended approval of the request to change the classification on the basis that  
18 Mr. Joseph's reclassification from Deputy Public Defender IV to Deputy District Attorney IV would  
19 be a reclassification to a position of the same rank and grade; that Ms. Joseph had demonstrated  
20 possession of the skills and aptitudes required in the position of Deputy District Attorney IV; and  
21 that there were no significant issues of concern with Ms. Joseph's current performance in the  
22 position of Deputy Public Defender IV.

23 9. The Director of Human Resources, Lisa Garrett, approved the request to reclassify  
24 Ms. Joseph and Ms. Joseph's reclassification became effective April 1, 2021.

25 10. After DHR approved the request, the District Attorney's Office transferred Ms.  
26 Joseph from her position as a Deputy Public Defender IV to the position Deputy District Attorney  
27 IV. Similarly, the District Attorney transferred other Deputy Public Defenders to the equivalent  
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1 Deputy District Attorney positions. At the time, the District Attorney’s Office did not deny any  
2 promotions to any other Deputy District Attorneys.

3 11. Pursuant to Civil Service Rule 15.03, the District Attorney’s Office requested that  
4 Alisa Blair (“Ms. Blair”) be reclassified from Deputy Public Defender III to Deputy District  
5 Attorney III. I analyzed this request based on the Civil Service Rules and requirements. Specifically,  
6 I analyzed 1) whether the reclassification was to a class of the same rank and grade; 2) whether Ms.  
7 Blair has demonstrated possession of the skills and aptitudes required in the position of Deputy  
8 District Attorney III; and 3) whether there were any significant issues of concern with Ms. Blair’s  
9 current performance in the position of Deputy Public Defender III.

10 12. On December 21, 2020, I recommended approval of the request to change the  
11 classification on the basis that Mr. Blair’s reclassification from Deputy Public Defender III to  
12 Deputy District Attorney III would be a reclassification to a position of the same rank and grade;  
13 that Ms. Blair had demonstrated possession of the skills and aptitudes required in the position of  
14 Deputy District Attorney III; and that there were no significant issues of concern with Ms. Blair’s  
15 current performance in the position of Deputy Public Defender III. A true and correct copy of a  
16 memo (with certain nonmaterial confidential employee information redacted), dated December 21,  
17 2020, setting forth my analysis and recommendations regarding the reclassification of Ms. Blair is  
18 attached hereto as Exhibit 1.

19 13. The Director of Human Resources, Lisa Garrett, approved the request.

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# EXHIBIT 1

December 21, 2020

To: Lisa Garrett

From: Rodney Collins

### CHANGE IN CLASSIFICATION REQUEST

The District Attorney requests that three Public Defender employees be allowed to change classifications. Pursuant to Civil Service Rule 15.03, Change of Classification. The rule provides as follows:

- A. Whenever it is found necessary to change the classification of an employee from a **nonsupervisory class, supervisory class in a bargaining unit as certified by ERCOM**, or managerial class in the Sheriff, to any other class, such change may be made administratively by the appointing power or powers, provided **both classes are of the same rank, there is no increase or decrease in grade**, and **the employee has demonstrated the possession of the skills and aptitudes required in the position to which the employee is to be changed**. Such change of classification **may be made only with the approval of the director of personnel**.

The employees and specific positions for which the change of classification is requested is noted below:

NAME (EE#)	Current Classification	Requested Classification
Tiffany Townend [REDACTED]	Deputy Public Defender IV (DPD IV)	Deputy District Attorney IV (DDA IV)
Alisa R. Blair [REDACTED]	Deputy Public Defender III (DPD III)	Deputy District Attorney III (DDA III)
[REDACTED]		

#### **TIFFANY TOWNEND, Deputy Public Defender IV**

A review of Ms. Townend's employee file and work history reflects no significant issues of concern with current performance in the position of Deputy Public Defender IV. The employee began her employment in 2002 and has held her current DPD IV position since July 1, 2019. Mr. Gascon, District Attorney has communicated with Mr. Ricardo Garcia his intention to have the employee transferred to the Office of the District Attorney. In communication with the Departmental Human Resources Manager there were no concerns raised with the employee's performance.

The CEO Classification unit, managed by Ann Havens, reviewed the DPD IV and DDA IV and assessed and found that 1) both classes are of the same rank and 2) there is no increase or decrease in grade. Please see the below chart analyzing the DPD IV and DDA IV position.

It is anticipated that if this or any change in classification is approved that the Union may raise concerns.

**Recommendation:** Approve change in classification

**ALISA R. BLAIR, Deputy Public Defender III**

Ms. Alisa Blair currently holds the position of Deputy Public Defender III. Ms. Blair's work performance as a DPD III is stellar. Her most recent PE's reflect Very Good and an indication that she "assigns herself the most challenging cases filed in the Los Padrinos branch." She has spent a significant amount of time focused on minors with complicated social backgrounds, serious trauma, mental illness and abuse. There are Equity complaints for the employee.

Like the DPD IV analysis, CEO communicated that the change in classification from DPD III to DDA III is of the same rank and grade.

**Recommendation:** Approve change in classification





**ATTACHMENT "A"**

	<b>DEPUTY DISTRICT ATTORNEY IV (9274)</b>	<b>DEPUTY PUBLIC DEFENDER IV (9252)</b>
Salary	\$11,395.36 - \$16,659.56	\$11,395.36 - \$16,659.56
Definition	Performs the most difficult legal work in the prosecution of criminal cases.	Performs the most difficult legal work required in representing the defense in criminal cases assigned to the Public Defender and supervises subordinates performing legal work of a lower level of difficulty.
Class Standards	In addition to the knowledge, skills, and abilities of a Deputy District Attorney I, II and III, positions allocable to this class are responsible for 1) prosecuting the most difficult and complex felony, juvenile, appellate, or other types of cases requiring a high degree of initiative, skill and specialized legal knowledge; 2) supervising a small staff of attorneys as a Calendar Deputy, Deputy-in-Charge of an area office, or section head; or 3) acting as assistant to a higher level position. This class encompasses administrative, lead person, and full supervisory positions and is the first level at which full supervisory or full administrative duties may be assigned. Direction received at this level is general in nature and primarily pertains to policy.	Positions allocable to this class are characterized by assignments involving (1) representing the defense in the most difficult and complex felony cases, including the defense of capital cases, which require a high degree of initiative, skill and specialized legal knowledge, and/or (2) as an area office or section head, <b><i>supervising other attorneys</i></b> in the performance of their duties. Positions in this class may also act as first assistant to a Head Deputy in charge of a branch office. Direction received at this level is general in nature and primarily pertains to policy.
MR	Two years of experience as a Deputy District Attorney III in the service of Los Angeles County.	Two years of experience as a Deputy Public Defender III.
License	Admission to practice law in California.	Admission to practice law in all courts in California.

**CLASS SPECIFICATION**

**DEPUTY PUBLIC DEFENDER IV**

**DEPUTY DISTRICT ATTORNEY IV**

**CLASS SPECIFICATION**

**DEPUTY PUBLIC DEFENDER III**

**DEPUTY DISTRICT ATTORNEY III**

## CLASS SPECIFICAT



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**SERVICE LIST**

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

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ANGELES COUNTY (ADDA)**

