

1 DONNA R. ZIEGLER [142415]  
County Counsel  
2 By: KRISTY L. VAN HERICK [SBN 178685]  
Assistant County Counsel  
3 K. SCOTT DICKEY [SBN 184251]  
Assistant County Counsel  
4 RAYMOND L. MACKAY [SBN 113230]  
Senior Deputy County Counsel  
5 CLAY J. CHRISTIANSON [SBN 143024]  
Deputy County Counsel  
6 Office of the County Counsel, County of Alameda  
1221 Oak Street, Suite 450  
7 Oakland, California 94612  
Telephone: (510) 272-6700  
8

9 Attorneys for COUNTY OF ALAMEDA,  
10 GREGORY AHERN, and ERICA PAN

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 OAKLAND DIVISION  
14

15 JANICE ALTMAN, et al.  
16 Plaintiffs,  
17 v.  
18 COUNTY OF SANTA CLARA, et al.  
19 Defendants.  
20  
21

Case No. 4:20-cv-02180-JST

**DECLARATION OF COLBY STAYSA IN  
SUPPORT OF DEFENDANTS'  
OPPOSITION TO APPLICATION FOR A  
PRELIMINARY INJUNCTION**

Date: May 20, 2020  
Time: 2:00 p.m.  
Judge: Jon S. Tigar  
Ctrm: 6

22  
23 I, Colby Staysa, declare:

24 1. I am a Division Commander for the Alameda County Sheriff's Office (ACSO) and  
25 have been employed by the Sheriff's Office since January of 1998.

26 2. The matters set forth in this Declaration are within my personal knowledge and if  
27 called as a witness, I could and would testify to the following competently.

28 ///

1 3. The matters stated in my Declaration support Defendants' Memorandum of Points  
2 and Authorities in Opposition to Plaintiffs' Motion for a Preliminary Injunction in this lawsuit.

3 4. During my employment, I have been assigned to patrol, special operations,  
4 investigations, and administration. I have worked at the ACSO Eden Township Division in every  
5 rank from Deputy to Division Commander. I have been the Division Commander of the Eden  
6 Township Division since February of 2019.

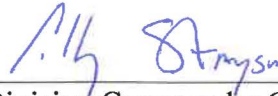
7 5. As the Division Commander located at the Eden Township headquarters, I manage  
8 ACSO's Youth and Family Services Bureau and Eden Township Substation. Collectively, the  
9 units operate patrol, investigations, traffic, crime prevention, and school resource officers. All  
10 Sheriff's Office law enforcement services provided to the unincorporated areas of Alameda  
11 County fall under my command.

12 6. As part of my responsibilities, I have been charged with enforcement of the public  
13 health Orders issued by Erica Pan, M.D., the Interim Public Health Officer for the County of  
14 Alameda. The public health Orders were issued on March 16 and then March 30, 2020. I am  
15 familiar with the Orders.

16 7. Deputy Sheriffs of the Alameda County Sheriff's Office have enforced the public  
17 health Orders against various non-essential businesses since the issuance of the initial public  
18 health Order. ACSO receives complaints about non-compliance with the public health Orders as  
19 well as through observation during their patrols. The Deputy Sheriffs issued warnings to non-  
20 essential businesses including but not limited to smoke shops, nail salons, barbershops, massage,  
21 floor stores, and martial arts studios. Warnings were given to two gun retail stores and they  
22 complied with the Orders. Altogether, 37 warnings were issued by ACSO and all of the  
23 businesses closed and complied. No businesses were cited.

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

26 Executed on the 29<sup>TH</sup> day of April 2020, at San Leandro, California.

27   
28 \_\_\_\_\_  
Division Commander Colby Staysa