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7 Attorneys for Defendants,  
COUNTY OF SAN MATEO, CARLOS BOLANOS  
8 And SCOTT MORROW

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 OAKLAND DIVISION  
12

13 JANICE ALTMAN, et. al.,

14 Plaintiffs,

15 v.

16 SANTA CLARA COUNTY, et.al,

17 Defendants  
18  
19

Case No. 20-cv-02180-JST

**DECLARATION OF JENNA MCALPIN IN  
SUPPORT OF DEFENDANTS'  
OPPOSITION TO PLAINTIFFS' MOTION  
FOR A PRELIMINARY INJUNCTION**

Date: May 20, 2020  
Time: 2:00 p.m.  
Dept: Courtroom 6 – 2nd Floor  
1301 Clay Street, Oakland, CA 94612  
Before: Honorable Jon S. Tigar

1 I, Jenna B. McAlpin, declare as follows:

2 1. I am a Criminal Records Manager for the Sheriff's Office of the County of San Mateo and  
3 have held that position since 2014. The following matters set forth in this declaration are within my  
4 personal knowledge (unless otherwise indicated), and if called as a witness, I could and would testify  
5 competently thereto.

6 2. I make this declaration in support of Defendants' Opposition to Plaintiffs' Motion for a  
7 Preliminary Injunction in the above-captioned action.

8 3. As a Criminal Records Manager, I am responsible for managing and coordinating  
9 operations for multiple functional areas relating to the Sheriff's Office's Records Unit. This unit manages  
10 the repository for the County of San Mateo's criminal records, and through the Criminal Records Bureau,  
11 is the official criminal record keeper for the County. Among other things, the unit maintains the County's  
12 records of written warnings and criminal citations issued by San Mateo County Sheriff's Deputies in  
13 connection with law enforcement. I am familiar with the maintenance system for such records, including  
14 records relating to enforcement of the shelter-in-place orders by the County Health Officer dated March  
15 16, and 31, 2020 (the "Orders"), which I have reviewed in connection with providing this declaration.

16 4. The County has issued written warning citations related to the Orders and citations for  
17 violations. Warnings have been issued to individuals engaged in non-essential travel or other non-essential  
18 activity, such as at parks or beaches. Warnings have been issued to businesses or business representatives  
19 largely related to non-essential construction activities. None of the written warnings or citations have been  
20 issued to nor concerned the operation of a firearms or ammunition retailer.

21 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
22 is true and correct. Executed this 21<sup>st</sup> day of April, at Redwood City, California.

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26 Jenna B. McAlpin  
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