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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION – SANTA ANA**

DOROTHY McKAY, DIANA KILGORE,
PHILLIP WILLMS, FRED KOGEN,
DAVID WEISS, and THE CRPA
FOUNDATION,

Plaintiffs,

v.

SHERIFF SANDRA HUTCHENS,
individually and in her official capacity as
Sheriff of Orange County; ORANGE
COUNTY SHERIFF-CORONER
DEPARTMENT; COUNTY OF ORANGE;
and DOES 1-10,

Defendants.

Case No. 8:12-cv-01458 JVS (JPRx)

**DECLARATION OF VICKI SANDS IN
SUPPORT OF DEFENDANTS'
OPPOSITION TO THE MOTION FOR
PRELIMINARY INJUNCTION**

**DATE: October 29, 2012
TIME: 1:30 p.m.
PLACE: Courtroom 10C**

I, Vicki Sands, declare:

1. Unless stated on information and belief, I have personal knowledge of the statements contained in this declaration, and if called upon to testify, I could and would competently testify to the facts stated below. Where statements are made on information and belief, I believe those statements to be true.

2. I am an Information Systems Analyst with the California Department of Justice (“DOJ”) and have worked with the State for 36 years.

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OFFICE OF THE COUNTY COUNSEL
COUNTY OF ORANGE

1 3. As a business and systems analyst, I develop and implement design
2 requirements, system specifications and enhancements for the Automated Criminal History
3 System ("ACHS"). I assist in the development of needs assessments and feasibility study
4 reports; perform multiple activities and provide technical skills for special projects which
5 include, but not limited to ACHS and its sub-files; monitor and respond to ACHS
6 information requests from user groups; write and maintain specifications for automated
7 interfaces with agencies; perform analysis and testing in the development and
8 implementation of design requirements and system enhancements.

9 4. The DOJ maintains a data warehouse copy of the ACHS for extracting
10 statistical information. The County of Orange, through the Office of County Counsel,
11 requested that the DOJ complete a statistical run from the ACHS database to determine the
12 number of criminal identification and index (CII) subjects originating in Orange County
13 with a felony arrest from January 1, 2011 – December 31, 2011. Based on this criteria, I
14 developed queries to search the system and extract appropriate numbers. From this run,
15 31,964 subjects at the time of arrest had an Orange County Originating Agency Identifier
16 (ORI).

17 5. Of these 31,964 subjects with a felony arrest, 10,420 had a felony conviction
18 prior to January 1, 2011, which includes 383 convicted of felony domestic violence
19 pursuant to Penal Code section 273.5.

20 6. Of these 31,964 subjects with a felony arrest, 1,332 had a misdemeanor
21 domestic violence conviction pursuant to Penal Code section 273.5 prior to January 1, 2011,
22 of which 676 also had a prior felony conviction.

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

25 EXECUTED this 9th day of October 2012 at Sacramento, California.

26
27 

28 Vicki Sands, Declarant

CERTIFICATE OF SERVICE

I do hereby declare that I am a citizen of the United States employed in the County of Orange, over 18 years old and that my business address is 333 W. Santa Ana Blvd., Suite 407, Santa Ana, California 92702-1379, and my email address is marz.lair@coco.ocgov.com. I am not a party to the within action.

I hereby certify that I caused the foregoing **DECLARATION OF VICKI SANDS IN SUPPORT OF DEFENDANTS' OPPOSITION TO THE MOTION FOR PRELIMINARY INJUNCTION** to be served on October 9, 2012, upon all counsel of record listed below by electronic filing utilizing the U.S.D.C.'s CM/ECF:

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I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed in Santa Ana, California this 9th day of October, 2012.



Marzette L. Lair

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COUNTY OF ORANGE