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County of San Diego
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5 Attorneys for Defendants County of San Diego, William D. Gore, Jan Caldwell,
Thomas Seiver, Brendan Cook, Jesse Allensworth, James Breneman, Michael Proctor,
6 San Diego County Sheriff's Department and Bonnie Dumanis

7
8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

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11 AMERICAN NEWS AND INFORMATION)
SERVICES, INC., a Connecticut Corporation;)
12 EDWARD A. PERUTA; and JAMES C.)
PLAYFORD,)

13 Plaintiffs,

14 v.

15 WILLIAM D. GORE, individually and in his)
official capacity as San Diego County Sheriff;)
16 JAN CALDWELL, individually and in her)
official capacity as San Diego County)
17 Sheriff's Department Public Affairs Director;)
THOMAS SEIVER,)
18 San Diego County Sheriff's Department)
Deputy, individually; BRENDAN COOK,)
19 San Diego County Sheriff's Department)
Deputy, individually; JESSE)
20 ALLENSWORTH, San Diego County)
Sheriff's Department Deputy, individually;)
21 JAMES BRENEMAN, San Diego County)
Sheriff's Department Deputy, individually;)
22 MICHAEL PROCTOR, San Diego County)
Sheriff's Department Deputy, individually;)
23 JOHN DOE 1-10; San Diego County Sheriff's)
Department; WILLIAM LANSDOWNE,)
24 individually and in his official capacity as San)
Diego Police Chief; JOHN DOE 1-10; San)
Diego Police Department; and BONNIE)
25 DUMANIS, individually and in her official)
capacity as San Diego County District)
26 Attorney; JOHN DOE 1-10; San Diego)
County District Attorney's Office,)
27 individually,

28 Defendants.

No. 12-cv-2186-BEN(KSC)

DECLARATION OF JAN CALDWELL
IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT

Date: April 22, 2016
Time: 10:30 a.m.
Dept.: 5A - Courtroom of the
Honorable Roger T. Benitez
Trial Date: None

1 I, JAN CALDWELL, declare as follows:

2 1. I am the Public Information Officer for the San Diego County Sheriff's
3 Department. I have held this position since 2006.

4 2. My responsibilities include:

5 (i) Planning, and directing the Sheriff's media and public relations activities;

6 (ii) Providing communication to the media and the public on departmental
7 functions and issues;

8 (iii) Formulating and implementing procedures, standards, and guidelines for the
9 collection, review, and presentation of information to be communicated to the public
10 through the media;

11 (iv) Scheduling media conferences, media releases, and public services
12 announcements;

13 (v) Directing the development and implementation of methods for
14 communicating information to the public, by the use of videos, e-mail, social media,
15 brochures, media releases, presentations, graphic displays, photographs, fact sheets,
16 directories, annual reports, or other mediums;

17 (vi) Supervising staff who manage the website, social media and video
18 production, as well as a deputy assigned to San Diego County Crime Stoppers.

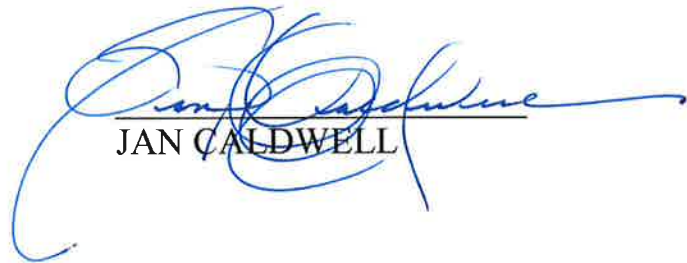
19 3. I am aware that James Playford was arrested for interfering with deputies at
20 some crime scenes in 2010-2012. I had no contact with those deputies in the making of
21 those arrests and have never given direction to a deputy regarding arrests of any kind.
22 Sheriff Gore has not given me any direction regarding Mr. Playford at any time.

23 4. After Playford was convicted of violation of Penal Code section 148 in May
24 2012, he was arrested again at a multiple-fatality accident scene on May 25, 2012, also
25 for interfering with deputies at a crime scene. Because of his increasingly aggressive
26 behavior, on May 31, 2012, I sent a photograph of Playford to the front desk at the
27 Sheriff's Administrative Center on Ridgehaven Court for security concerns. The
28 photograph was not distributed to deputies in the field.

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2 5. Since 2009, I have been conducting in-house media training for deputies and
3 civilian staff of the Sheriff's Department. The training includes information about the
4 rights of media and the public and the current trends in social media and the impacts on
5 law enforcement. The training provided to deputies, professional staff, new supervisors,
6 and Search and Rescue volunteers also includes blocks of instruction on the various types
7 of media, policy and procedure on working with the media, interview training/scenarios,
8 media release preparation, media conference considerations, and Joint Information
9 Centers. Deputies also receive media training in the Regional Academy during their
10 initial P.O.S.T. certified training.

11 I declare under penalty of perjury under California law that the foregoing is true
12 and correct.

13 Executed in San Diego, California, March 18, 2016.

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16 JAN CALDWELL
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