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9 UNITED STATES BANKRUPTCY COURT
 10 EASTERN DISTRICT OF CALIFORNIA
 11 SACRAMENTO DIVISION
 12

13 In re:
 14 CITY OF STOCKTON, CALIFORNIA,
 15 Debtor.

Case No. 2012-32118
 D.C. No. OHS-15
 Chapter 9

**DECLARATION OF ERIC JONES IN
 SUPPORT OF CITY'S
 SUPPLEMENTAL MEMORANDUM
 OF LAW IN SUPPORT OF
 CONFIRMATION OF FIRST
 AMENDED PLAN FOR THE
 ADJUSTMENT OF DEBTS OF CITY
 OF STOCKTON, CALIFORNIA
 (NOVEMBER 15, 2013)¹**

Date: May 12, 2014
 Time: 9:30 a.m.
 Dept: Courtroom 35
 Judge: Hon. Christopher M. Klein

26 ¹ Paragraph 13 of the Order Modifying Order Governing The Disclosure And Use Of Discovery Information And
 27 Scheduling Dates Related To The Trial In The Adversary Proceeding And Any Evidentiary Hearing Regarding
 28 Confirmation Of Proposed Plan Of Adjustment (Dkt. No. 1242, modifying Dkt. No. 1224) contemplates that the
 Parties will submit direct testimony declarations for their respective witnesses by April 21, 2014. Accordingly, the
 declarations submitted in support of this Supplemental Memorandum do not contain all of the information and do not
 attach all of the evidence that will be included in the direct testimony declarations that will be filed on April 21.

1 I, Eric Jones, hereby declare:

2 1. I am the Chief of Police in the City of Stockton, California (“the City” or
3 “Stockton”). I make this declaration in support of the City’s Supplemental Memorandum Of Law
4 In Support Of Confirmation Of First Amended Plan For The Adjustment Of Debts Of City Of
5 Stockton, California (November 15, 2013).

6 2. I have served in the Stockton Police Department in some capacity for over 20
7 years. I became the Chief of Police in March of 2012. Prior to becoming Chief, I served as
8 Assistant Chief from September 2011 to March 2012 and as Deputy Chief from March 2008 to
9 September 2011. I hold a bachelor’s degree in Criminal Justice from California State University,
10 Sacramento, and a Masters of Public Administration from National University. I am a member of
11 the Central Sierra Police Chiefs Association, California Police Chiefs Association, and the
12 International Association of Chiefs of Police. I hold certificates from the Commission on Peace
13 Officer Standards and Training, and am a member of the FBI’s National Academy Law
14 Enforcement Executive Development Association and Police Executive Research Forum.

15 3. On June 28, 2012, I executed a declaration in support of the Statement of
16 Qualifications the City filed on June 29, 2012 (the “June Declaration” or “June Decl.”). On
17 February 15, 2013, I submitted a declaration in support of the City’s Reply to Objections to
18 Statement of Qualifications Under Section 109(c) (the “Reply Declaration” or “Reply Decl.”).
19 *The Continuing Challenges To Public Safety In Stockton*

20 4. As of the date of this Declaration, all of my testimony in the June Declaration and
21 Reply Declaration continues to be true and accurate to the best of my knowledge. The City of
22 Stockton continues to suffer from a disproportionately high crime rate and low number of police
23 officers. Violent crime, despite a reduction in 2013, is still extremely high in Stockton. Already
24 in 2014 (as of March 25), there have been 12 homicides, compared to six homicides at this time
25 last year. Further, although violent crime reduced in 2013, overall crime did not.

26 5. Another major challenge is the continually understaffed police department. Not
27 including positions funded by Measures A and B, as of today the Stockton Police Department has
28 365 budgeted positions (which include the recent COPS hiring grant). Although we have made

1 some incremental progress in our hiring outpacing our attrition, the police department has so far
2 been able to fill only 351 of these positions. This is partly because hiring has outpaced attrition at
3 an extremely slow pace. From January 2012 to date (March 25, 2014), the Stockton Police
4 Department has hired 134 police officers; during the same time period, 104 police officers have
5 left the department through attrition. This attrition itself is a major challenge to public safety,
6 because it takes with it vast experience that is difficult to replace.

7 6. Once the 365 budgeted positions are filled, under Measures A and B the
8 authorized budgeted positions for the police department will increase to 485. The police
9 department believes that if aggressive hiring were to take place, we could potentially reach the
10 485 police officer level about three years from now. But even at the level of 485 police officers,
11 the officer-per-thousand-resident ratio would be only 1.6. This is still far from the 2.0 ratio
12 recommended in 2006 for the City of Stockton by Dr. Anthony Braga, as well as the 2.0 ratio
13 recommended in 2013 by criminal justice consultants David Bennett and Donna Lattin as part of
14 their Marshall Plan report. Stockton needs about 600 police officers to reach the recommended
15 2.0 officer-per-thousand-resident, and even at 485 officers, Stockton will be nowhere near this
16 level.

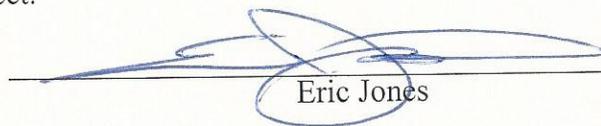
17 7. Additionally problematic is the fact that police officers are still leaving the
18 Stockton Police Department for other police departments. The Stockton Police Department is not
19 competitive in the marketplace with other police departments and this is drastically affecting our
20 retention and recruitment. Of the 104 police officers that left the department from January 2012
21 through March 25, 2014, 44 left for other police departments. I continue to speak with exiting
22 staff as well as various members of the department to keep a pulse on department morale. Most
23 officers, as well as my managers and commanders, continue to tell me that if the Department's
24 CalPERS contract is broken, they will depart to another agency. Others continue to say that they
25 will leave the Department if any additional compensation or benefit cuts occur, or even if they fail
26 to get any of their previous 20-30% cuts restored. The Department morale is fragile, and the
27 continued instability is causing police officers to depart or apply to other law enforcement
28

1 agencies. And all of this is happening at a time when Stockton most needs experienced, high-
2 quality police officers.

3 Importance Of Measure A

4 8. The passage of Measure A was critical for public safety in Stockton. Proceeds
5 from Measure A will fund the Marshall Plan, which will bring 120 additional police officers over
6 an approximate three year period and fund the Office of Violence Prevention and Neighborhood
7 Blitz teams. The proceeds will fund Stockton crime-fighting strategies that have been touted by
8 national experts like Stewart Wakeling of California Partnerships for Safe Communities, United
9 States Attorney for the Eastern District of California Benjamin Wagner, and COPS Office
10 Director Ronald Davis. Without the passage of Measure A and its future addition of staff, we
11 would not be able to combat crime effectively where we are the second-most violent City in the
12 State of California. Unfortunately, as explained above, even with the passage of Measure A we
13 will continue to be an understaffed police department.

14
15 Executed this 31ST day of March 2014, at Stockton, California. I declare
16 under penalty of perjury under the laws of the State of California and the United States of
17 America that the foregoing is true and correct.

18 
19 Eric Jones