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Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CALIFORNIA REFORM SEX OFFENDER  
LAWS, a California Non-Profit Organization;  
JOHN DOE #1, an individual; JOHN DOE #2,  
an individual; JOHN DOE #3, an individual;  
JOHN DOE #4, an individual; and JOHN DOE  
#5, an individual;

Plaintiffs.

vs.

JEH JOHNSON, in his official capacity as  
Secretary of Homeland Security; JOHN H.  
KERRY, in his official capacity as Secretary of  
State of the United States; LORETTA LYNCH,  
in her official capacity as Attorney General of  
the United States; SARAH SALDANA, in her  
official capacity as Assistant Secretary of  
Immigration and Customs Enforcement; R. GIL  
KERLIKOWSKE, in his official capacity as  
Commissioner of U.S. Customs and Border  
Protection; DAVID HARLOW, in his official  
capacity as Acting Director of the United States  
Marshals Service; and DOES 1 to 20, inclusive.

Defendants.

Case No.: 4:16-CV-654-PJH

**DECLARATION OF CHARLENE  
STEEN, Ph.D., IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION**

I, Charlene Steen, declare as follows:

1. I am a competent adult over 18 years of age and a resident of the State of California.

1           2.     The statements in this declaration are true and if called upon to do so, I  
2 could and would testify competently to the matters set forth below. This information is  
3 based upon my personal knowledge and on sources of the type which researchers in my  
4 field rely upon in our work.

5 **DEFINITIONS**

6           3.     In this declaration, the term, “Public Registry” refers to one of the  
7 collection of public websites maintained by or under the auspices of the governments of  
8 US states, possessions, and the District of Columbia, which websites provide the names,  
9 photographs, and other identifying information of people who have been convicted of  
10 any of a designated set of crimes. The designated crimes that lead to inclusion on the  
11 Public Registries are generally of a sexual nature, although they may also include arson,  
12 kidnapping, and a number of violent crimes.

13           4.     In addition to the Public Registries, some jurisdictions also maintain related  
14 databases of information that is not available to the public. A Public Registry together  
15 with its associated non-public database is called together the jurisdiction’s “Registry.”  
16 This declaration focuses attention primarily on the Public Registries.

17           5.     The first state Registry (not yet a Public Registry) was started by California  
18 in 1947 and gradually other states implemented the idea until all states had one by 1996.  
19 The crimes for which people were initially put on the Registries were mostly engaging in  
20 or soliciting homosexual acts until such acts were decriminalized nationwide in 2003.  
21 My research has not determined which state first put its Registry on a public website  
22 (starting the first Public Registry), but this appears to have occurred in the early or mid-  
23 1990s. In 2003, federal legislation required all states to have a Public Registry.

24           6.     Although there are other countries in which Registries are maintained, to  
25 my knowledge there is no Public Registry maintained anywhere outside the United  
26 States.

**MY EXPERTISE**

7. I was graduated from the University of California Los Angeles (UCLA) with a bachelor of arts degree; from California State University Long Beach with a master of arts degree; from Northrop College of Law with a juris doctorate degree; from California State University Sacramento with a master of social works degree; and from Wright Institute with a Ph.D. degree in psychology. I am a retired licensed psychologist, social worker and a former licensed attorney. I am the author of four books regarding the treatment of registered sex offenders, including “Choices: A Relapse Prevention Workbook for Female Offenders ” and “The Adult Relapse Prevention Workbook.”

**ATTACKS ON PEOPLE AND PROPERTY MOTIVATED BY PUBLIC REGISTRIES**

8. One of the striking facts that I observed in my work with registrants is the enmity with which many people regard any person who appears on a Public Registry, including but not limited to, the California Megan’s Law website, usually without knowing anything about the nature of the crime that caused them to so appear. In both my business and professional lives, I frequently hear complaints from people about being attacked verbally or physically or their property being vandalized because they or a member of their household appear on a Public Registry. Schoolchildren of whom a parent appears on a Public Registry are often harassed and bullied by classmates who are made aware of this fact by their parents or by fliers posted in their neighborhoods with information obtained from the Public Registry.

9. To my knowledge, all Public Registries provide warnings to users not to use their information to harass, intimidate, or injure any person appearing thereon. However, those warnings appear to be widely ignored and appear to be seldom or weakly enforced. I occasionally hear complaints from people that police departments and sheriff offices decline to take action on reports of property damage or physical injury to people who appear on a Public Registry or their households.

**VIGILANTE ATTACKS AND MURDERS USING PUBLIC REGISTRIES**

10. There is no official record of attacks on persons or property motivated by the appearance of an individual on a Public Registry. To my knowledge, there has been no formal academic or professional study of such data. Thus it is impossible to know how frequently such attacks occur and to estimate the cost in dollars, lives, and human suffering of the registrants and their family members. The best that can be done is to report anecdotally on the worst cases that have come to national attention.

11. In January 1995, only a few months after their state instituted its Public Registry, Kenneth Kerkes of Phillipsburg, NJ, and his son, Kenneth Jr., found a neighbor, Michael Groff, on that registry. They broke into the home at Groff's address at 3 a.m. intending to beat up Groff but instead mistakenly beat up another man who was staying there.

12. In April 2003, Lawrence Trant downloaded a list of addresses in Concord, MA, from the Public Registry and began checking them off as he set them on fire. Later that month, he was arrested when he confronted one of the men on his list, Lawrence Sheridan, with a baseball bat and knife and stabbed him.

13. In February 2004, police in Bakersfield, CA, distributed a flyer with information from the Public Registry about Vincent Verdile. About two weeks later, Gabriel Garcia was at Verdile's front door with a knife, threatening to kill him and kicking in his door until police shot and killed him to prevent his entry into the home with the knife.

14. In August 2005, Michael Mullen went to an address in Bellingham, WA, that he found listed on the Public Registry. He impersonated an FBI agent in order to gain entry to the residence, where he then shot and killed registrants Hank Eisses and Victor Vasquez.

15. In April 2006, Stephen Marshall took the addresses of William Elliott and Joseph Gray of Corinth, ME, from the Public Registry. He first went to Elliott's home

1 where he shot and killed him. Then he went to Gray's home and did the same to him. He  
2 intended to continue killing people on the Public Registry until he shot and killed  
3 himself when approached by police about the murders. Elliott was on the Public Registry  
4 because he had sex when he was 19 with his girlfriend three weeks before her 16<sup>th</sup>  
5 birthday.

6 16. In September 2006, Donald Keegan was charged with attempted murder for  
7 plotting to set on fire the Long Island, NY, residence of four men listed on the Public  
8 Registry.

9 17. In November 2007, Ivan Oliver of Lakeport, CA, misinterpreted  
10 information on the Public Registry about his new neighbor, Michael Dodele, to mean  
11 that Dodele's crime had been with a child, which it had not. Worried therefore for his  
12 four-year-old son's safety, he went to Dodele's home and stabbed him 65 times, killing  
13 him.

14 18. In August 2009, Steven Banister chose the Palm Springs, CA, address of  
15 Edward Keeley from the Public Registry. He and Travis Cody then went the 75-year-old  
16 man's home, where they robbed and killed him.

17 19. In June 2012, Patrick Drum shot and killed Gary Blanton, who was on the  
18 Public Registry and rented a room in the same house as him in Sequim, WA. He then  
19 drove to the home of registrant Jerry Ray in nearby Agnew and fatally shot him as well.  
20 Drum said he killed the men "because they were sex offenders" and that he had planned  
21 on killing more of them until he was caught. Blanton was on the Public Registry  
22 because he had sex with his girlfriend when he was a senior in high school and she was a  
23 freshman. In a court hearing, Blanton's widow reported that people who considered  
24 Drum a hero had stalked her home, spat on her family, and thrown things at her car.

25 20. In December 1, 2012, in San Juan Capistrano, CA, Robert Vasquez  
26 murdered Bobby Ray Rainwater after Vasquez learned that Rainwater was a registrant.  
27  
28



1 Both men lived in the same trailer park. Rainwater was attacked from behind and was  
2 stabbed so many times practically decapitated.

3 21. On July 22, 2013, in Lockhart, SC, Jeremy Moody murdered registrant  
4 Charles Parker and his wife, Gretchen Parker, inside their home. Moody pretended to  
5 have car problems outside the home and asked to use the couple's home phone to call a  
6 tow truck. After his arrest, Moody told police that he killed Mr. and Mrs. Parker  
7 because Mr. Parker was a registered sex offender.

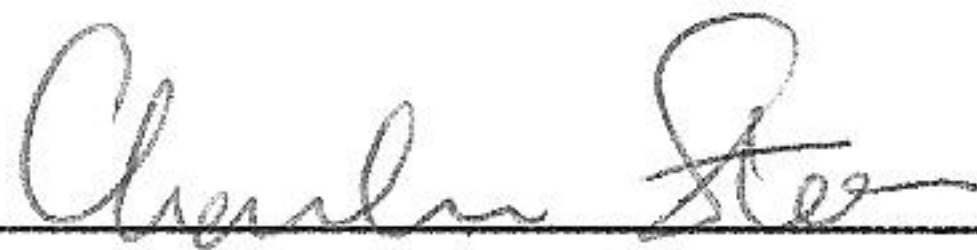
8 22. On August 12, 2013, in Salinas, CA, an unknown assailant murdered  
9 registrant Donald Crisp as he stood in the driveway of his home. Police officers have a  
10 description of the assailant's car but have not yet arrested anyone.

11 23. On September 8, 2013, in Greenfield, CA, registrant Julio Rodarte was shot  
12 outside his home. Police officers have a description of the man who shot him; however,  
13 no one has yet been arrested.

14 24. On September 19, 2015, in Redding, CA, registrant Roy Matagora was shot  
15 and significantly injured by Timothy Gould when he opened the front door of his home.  
16 After his arrest, Mr. Gould told police that he shot Mr. Matagora because he is a sex  
17 offender.

18 I declare under penalty of perjury under the laws of the State of California  
19 that the foregoing is true and correct to the best of my knowledge.

20  
21 Dated: February 17, 2016

  
Charlene Steen, Ph.D.