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Attorney for Plaintiffs John Doe #1, John Doe #2,
John Doe #3 and John Doe #4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

JOHN DOE #1, an individual;
JOHN DOE #2, an individual;
JOHN DOE #3, an individual; and
JOHN DOE #4, an individual;

Plaintiffs,

vs.

JOHN KERRY, in his official
capacity as Secretary of State of the
United States; JEH JOHNSON, in his
official capacity as Secretary of
Homeland Security; 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. 16-cv-00654-PJH

DECLARATION OF ATTORNEY
ALEXANDER L. LANDON IN SUPPORT
OF PLAINTIFFS' REQUEST FOR ORDER
TO SHOW CAUSE RE PRELIMINARY
INJUNCTION

1 I, Alexander L. Landon, declare as follows:

2 1. I currently reside in the State of California.

3 2. I was admitted as an attorney to the California Bar on January 5, 1972,
4 and have practiced law without interruption since that time.

5 3. I am a sole practitioner and a Certified Specialist in Criminal Law by the
6 California State Bar Board of Legal Specialization.

7 4. I am an adjunct law professor at the University of San Diego School Law
8 where I teach criminal law courses.

9 5. I am a member of the board of directors of the California Reform Sex
10 Offender Laws, a statewide non-profit organization, dedicated to protecting the U.S.
11 Constitution by restoring the civil rights of sex offenders ("registrants").

12 6. As an attorney, I have successfully represented clients in obtaining
13 Certificates of Rehabilitation (CoR's) in San Diego County. Although those
14 registrants have obtained CoR's and are no longer required to register as sex
15 offenders, their travel outside the country will be reported to foreign nations pursuant
16 to notification provisions of the International Megan's Law. I am aware that
17 registrants who obtain a CoR may no longer be required to resregister as sex offenders,
18 but they will have their travel outside the country reported to foreign nations pursuant
19 to notification provisions of the International Megan's Law.

20 7. In order to apply for a CoR, a registrant must first demonstrate that he is
21 eligible. That is, he must (a) obtain a dismissal of his offense pursuant to California
22 Penal Code Section 1203.4, (b) be free of any subsequent felony conviction, (c) wait
23 for at least 10 years after his release and (d) reside in the state of California for at
24 least 5 years prior to application. While there are no available statistics, it is believed
25 that less than 1 percent or about 1,000 registrants in the State of California are eligible
26 to apply for a CoR.

1 8. In order to obtain a CoR, a registrant must prove to a Superior Court
2 judge that he has lived an honest and upright life, conducted himself with sobriety and
3 industry and exhibited good moral character. In addition, he must demonstrate that he
4 has conformed to and obeyed all the laws of the land.

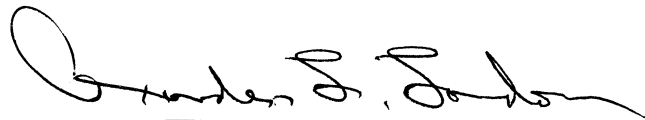
5 9. The CoR process for each registrant includes an investigation conducted
6 by an Office of the District Attorney in many cases, a comprehensive psychological
7 evaluation by a Ph.D. psychologist and letters of recommendation from community
8 leaders, clergy and/or family members. This process often takes at least 12 months
9 and costs more than \$5,000.

10 10. The decision of a Superior Court judge to grant a CoR is discretionary
11 and must include a written determination that the registrant has been rehabilitated.

12 11. As a criminal law practitioner, I frequently speak with individuals who
13 have been convicted of sex offenses. The offenses for which these individuals have
14 been convicted include, but are not limited to, public indecency (public urination and
15 streaking after high school graduation), creation and distribution of child pornography
16 (nude “selfies” sent to fellow high school students), and statutory rape (teen sex).

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20 I declare under penalty of perjury of the laws of the United States that the foregoing is
21 true and correct.

22
23 Dated: February 16, 2016



Alexander L. Landon