

RLS RAINS LUCIA STERN, PC

Peter A. Hoffmann
Attorney at Law
PHoffmann@RLSlawyers.com

July 13, 2015

VIA ELECTRONIC MAIL, FACSIMILE & FIRST CLASS MAIL

Sheriff Ross Mirkarimi
San Francisco Sheriff's Department
City Hall, Room 456
1 Carlton Goodlett Place
San Francisco, CA 94102

Re: Grievance and Demand to Meet & Confer regarding ICE Procedures Directives

Dear Sheriff Mirkarimi:

On behalf of the San Francisco Deputy Sheriffs' Association ("SFDSA" or "Association"), please accept this correspondence as a formal grievance and demand to initiate the meet and confer process concerning the San Francisco Sheriff's Department's ("Department") March 9, 2015 directive titled "Immigration & Custom Enforcement Procedures (ICE)" and its subsequent directive titled "Immigration & Custom Enforcement Procedures (ICE) Contact and Communication" issued on March 13, 2015.

As evidenced by the tragic death of Kate Steinle on July 1st, the Department's refusal to coordinate, much less cooperate, with federal law enforcement agencies recklessly compromises the safety of sworn personnel, citizens, and those who merely come to visit the San Francisco area. Given that the Department unilaterally implemented these changes without discussing the matter during its monthly labor-management meetings with the Association, much less satisfied its meet and confer obligations with the SFDSA as required by Article I.G. ("Negotiation Responsibility") of the Memorandum of Understanding ("MOU") between the City & County of San Francisco ("CCSF") and sections 3504-3505 of the Meyers-Milias-Brown Act ("MMBA") (Government Code section 3500 *et seq.*), the Association hereby demands that the Department immediately rescind the directives and comply with its statutory and contractual obligations to meet and confer in good faith before seeking to implement any changes to longstanding Department policies and procedures designed to safeguard law abiding citizens. Moreover, it is the Association's sincere belief that any changes that the Department might pursue should honor Ms. Steinle's life by correcting the Department's flawed philosophy so that the people of San Francisco – citizens, visitors, and employees alike – are safer in the future. Alternatively, should

Sheriff Ross Mirkarimi

Re: Grievance and Demand to Meet & Confer regarding ICE Procedures Directives

July 13, 2015

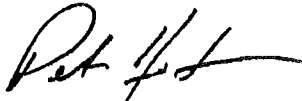
Page 2

the Department adhere to your directives to limit future communications with ICE, the SFDSA believes that only the sheriff – and not deputized personnel – should review and personally approve (or deny) each ICE Immigration Detainer, ICE Administrative Warrant, ICE Internal Order to Detain or Release, ICE entries in NCIC, and other requests from ICE.

Thank you for your prompt attention to this important matter. The Association looks forward to your written response on or before July 24, 2015.

Respectfully,

RAINS LUCIA STERN, PC

A handwritten signature in black ink, appearing to read "Peter A. Hoffmann", written in a cursive style.

Peter A. Hoffmann

PAH:my

cc: Eugene Cerbone, SFDSA President
Martin Gran, Employee Relations Director
Jim Bickert, RLS