

# **EXHIBIT 6**

1 XAVIER BECERRA  
 Attorney General of California  
 2 ROBERT W. BYRNE  
 SALLY MAGNANI  
 3 MICHAEL L. NEWMAN  
 Senior Assistant Attorneys General  
 4 MICHAEL P. CAYABAN  
 CHRISTINE CHUANG  
 5 EDWARD H. OCHOA  
 Supervising Deputy Attorneys General  
 6 HEATHER C. LESLIE  
 JANELLE M. SMITH  
 7 JAMES F. ZAHRADKA II  
 LEE I. SHERMAN (SBN 272271)  
 8 Deputy Attorneys General  
 300 S. Spring St., Suite 1702  
 9 Los Angeles, CA 90013  
 Telephone: (213) 269-6404  
 10 Fax: (213) 897-7605  
 E-mail: Lee.Sherman@doj.ca.gov  
 11 *Attorneys for Plaintiff State of California*

12  
 13 IN THE UNITED STATES DISTRICT COURT  
 14 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 15 OAKLAND DIVISION  
 16

17 **STATE OF CALIFORNIA; STATE OF**  
 18 **COLORADO; STATE OF**  
 19 **CONNECTICUT; STATE OF**  
 20 **DELAWARE; STATE OF HAWAII;**  
 21 **STATE OF ILLINOIS; STATE OF**  
 22 **MAINE; STATE OF MARYLAND;**  
 23 **COMMONWEALTH OF**  
 24 **MASSACHUSETTS; ATTORNEY**  
 25 **GENERAL DANA NESSEL ON BEHALF**  
 26 **OF THE PEOPLE OF MICHIGAN;**  
 27 **STATE OF MINNESOTA; STATE OF**  
 28 **NEVADA; STATE OF NEW JERSEY;**  
**STATE OF NEW MEXICO; STATE OF**  
**NEW YORK; STATE OF OREGON;**  
**STATE OF RHODE ISLAND; STATE OF**  
**VERMONT; COMMONWEALTH OF**  
**VIRGINIA; and STATE OF WISCONSIN;**

4:19-cv-00872-HSG

**DECLARATION OF James C. Rovella**

Plaintiffs,

v.

**DONALD J. TRUMP, in his official capacity**

1 as President of the United States of America;  
2 **UNITED STATES OF AMERICA; U.S.**  
3 **DEPARTMENT OF DEFENSE; PATRICK**  
4 **M. SHANAHAN**, in his official capacity as  
5 Acting Secretary of Defense; **MARK T.**  
6 **ESPER**, in his official capacity as Secretary of  
7 the Army; **RICHARD V. SPENCER**, in his  
8 official capacity as Secretary of the Navy;  
9 **HEATHER WILSON**, in her official capacity  
10 as Secretary of the Air Force; **U.S.**  
11 **DEPARTMENT OF THE TREASURY;**  
12 **STEVEN T. MNUCHIN**, in his official  
13 capacity as Secretary of the Treasury; **U.S.**  
14 **DEPARTMENT OF THE INTERIOR;**  
15 **DAVID BERNHARDT**, in his official capacity  
16 as Acting Secretary of the Interior; **U.S.**  
17 **DEPARTMENT OF HOMELAND**  
18 **SECURITY; KIRSTJEN M. NIELSEN**, in  
19 her official capacity as Secretary of Homeland  
20 Security;

21  
22  
23  
24  
25  
26  
27  
28  
Defendants.

1 I, James C. Rovella, declare as follows:

2 1. I am Commissioner of the Connecticut Department of Emergency Services and  
3 Public Protection. I have personal knowledge of the facts set forth in this declaration. If called as  
4 a witness, I could and would testify competently to the matters set forth below.

5 2. For at least each of the last five years, state and local law enforcement agencies in  
6 the State of Connecticut have received equitable sharing resources – in both currency and  
7 property – from the federal Treasury Forfeiture Fund (TFF). Those resources are an important  
8 part of supporting effective law enforcement activities in Connecticut, and keeping our  
9 communities safe and secure.

10 3. According to federal audits, in Federal Fiscal Year (FFY) 2018, which ended on  
11 September 30, 2018, Connecticut-based law enforcement received TFF equitable sharing  
12 resources worth a total dollar value of \$1,113,000, with \$1,060,000 in currency and the remainder  
13 in property. In FFY 2017, Connecticut received \$311,000 in TFF equitable sharing resources, all  
14 in currency. In FFY 2016, Connecticut received \$354,000 in TFF equitable sharing resources, all  
15 in currency. In FFY 2015, Connecticut received \$460,000 in TFF equitable sharing resources, all  
16 in currency. And in FFY 2014, Connecticut received \$440,000 in TFF equitable sharing  
17 resources, all in currency.

18 4. In each of the last five years, the Connecticut Department of Emergency Services  
19 and Public Protection (DESPP), which houses the Connecticut State Police, has received a  
20 significant amount of currency through TFF equitable sharing. In State FY (SFY) 2018, ending  
21 June 30, 2018, we received \$335,514; in SFY 2017, we received \$93,637; in SFY 2016, we  
22 received \$51,319; in SFY 2015, we received \$269,251; and in SFY 2014 we received \$335,904.

23 5. Those TFF resources support key aspects of our work that are critical to our  
24 continuing to protect the public. In SFY 2018, for instance, DESPP spent \$108,595 in TFF  
25 equitable sharing funds on travel for necessary training activities; \$42,158 for equipment for line-  
26 of-duty law enforcement personnel; and \$36,971 to support law enforcement operations.

27 6. DESPP regularly, and on an ongoing basis into the current fiscal year, submits  
28 claims to equitable sharing from the TFF. I am not aware of any instances in which Connecticut

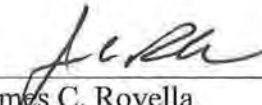


1 has submitted a claim for equitable sharing resources from the Treasury Forfeiture Funds and  
2 been denied its reasonable share of forfeited assets.

3 7. If TFF funds are denied to DESPP, it will negatively impact our ability to train,  
4 equip, and deploy state police officers. Connecticut anticipates a significant budget shortfall in the  
5 upcoming fiscal years, and I do not anticipate that state general funds will be available to replace  
6 resources lost if TFF funds are diverted.

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

9 Executed on Friday, March 29, 2019, at Middletown, Connecticut.

11  
12   
13 James C. Rovella  
14 Commissioner  
15 Department of Emergency Services and  
16 Public Protection

15 State of Connecticut

16 County of Middletown

17 On this the 29<sup>th</sup> day of March, 2019, before me,  
18 Abi Levesque (name of notary), personally appeared  
19 James C. Rovella, known to me (or satisfactorily proven) to be the  
20 person(s) whose name(s) \_\_\_\_\_ (is or are) subscribed to the within instrument and  
acknowledged that James C. Rovella (he/she/they) executed the same for the  
purposes therein contained.

21 In witness whereof I hereunto set my hand.

22 Date: March 29, 2019

23   
\_\_\_\_\_

24 Notary Public

25 Print Name: Abi Levesque

**Abi Levesque**  
**NOTARY PUBLIC**  
**State of Connecticut**  
**My Commission Expires 05/31/2020**

26 My Commission Expires:

27 05/31/2020  
28