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11 Attorneys for Plaintiff, The People of the
State of California, et al.
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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF ALAMEDA**

15 THE PEOPLE OF THE STATE OF
CALIFORNIA ex rel John A. Russo, City
16 Attorney for the City of Oakland,

17 Plaintiff,

18 v.

19 NORTH SIDE OAKLAND, a criminal street
gang sued as an unincorporated
20 association, and DOE ONE through DOE
SEVENTY, inclusive,

21 Defendants.
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Case No. RG10498901

**ASSIGNED FOR ALL PURPOSES
TO JUDGE ROBERT B. FREEDMAN -
DEPARTMENT 20**

**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF THE PEOPLE'S
CONSOLIDATED REPLY BRIEF IN
RESPONSE TO (1) BRIEFS FILED BY
FRIENDS OF THE COURT AND (2)
DEFENDANT YOUNG'S SUPPLEMENTAL
OPPOSITION TO PRELIMINARY
INJUNCTION, DECLARATIONS IN
SUPPORT THEREOF, AND EVIDENTIARY
OBJECTIONS**

Date: May 27, 2010

Time: 2:00 p.m.

Department: One

Action Filed: February 18, 2010

Trial Date: not assigned

1 Pursuant to California Evidence Code sections 452(h) and 453 et seq., Plaintiff
2 respectfully asks this court to take judicial notice of the following research publications:

- 3 1. "North Oakland – Community Information Book 2001", Alameda County Health Services
4 Agency, Public Health Department, Community Assessment, Planning, and Education Unit.
5 Attached hereto as Exhibit A.
- 6 2. Raffy Astvasadoorian, *California's Two-Prong Attack Against Gang Crime and Violence:
7 The Street Terrorism Enforcement and Prevention Act and Anti-Gang Injunctions*, 19 J. Juv.
8 L. 272, 273 -274 (1998). Attached hereto as Exhibit B.
- 9 3. Anthony A. Braga and Christopher Winship, *Critic: Partnership, accountability, and
10 innovation: clarifying Boston's experience with pulling levers*. Attached hereto as Exhibit C.
- 11 4. Cheryl L. Maxson, Karen M. Hennigan, and David C. Sloane, "*Its Getting Crazy Out
12 There*": *Can a Civil Gang Injunction Change a Community?*, (2005) 4 Criminology and
13 Pub. Pol'y 577. Attached hereto as Exhibit D.
- 14 5. Jeffrey Grogger, *The Effects of Civil Gang Injunctions on Reported Violent Crime: Evidence
15 From Los Angeles County* (2002) 45 J. L. & Econ. 69. Attached hereto as Exhibit E.

15 DATED: May 25, 2010

16 JOHN A. RUSSO, City Attorney
17 BARBARA J. PARKER, Chief Assistant City Attorney
18 ROCIO V. FIERRO, Supervising Attorney
19 AMBER R. MACAULAY, Deputy City Attorney

20 By: _____\s\ AMBER R. MACAULAY
21 Attorneys for Plaintiff
22 The People of the State of California, et al.
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PROOF OF SERVICE
The People of the State of California, et al. v. North Side Oakland, et al.
Alameda County Superior Court No. RG10498901

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is City Hall, One Frank H. Ogawa Plaza, 6th Floor, Oakland, California 94612. On the date set forth below, I served the within document:

REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF THE PEOPLE’S CONSOLIDATED REPLY BRIEF IN RESPONSE TO (1) BRIEFS FILED BY FRIENDS OF THE COURT AND (2) DEFENDANT YOUNG’S SUPPLEMENTAL OPPOSITION TO PRELIMINARY INJUNCTION, DECLARATIONS IN SUPPORT THEREOF, AND EVIDENTIARY OBJECTIONS

by e-mailing the document(s) listed above to the person(s) set forth below:.

Michael Haddad, Esq. Julia Sherwin, Esq. Haddad & Sherwin 505 Seventeenth Street Oakland, CA 94612 Attorneys for Defendant Yancie Young Haddad.sherwin@sbcglobal.net	Jory Steele, Esq. 39 Drumm Street San Francisco, CA 94111 Attorneys for amicus curiae, ACLU Jsteele@aclunc.org
Kendra Fox-Davis, Esq. 131 Steuart Street, Suite 400 San Francisco, CA 94105 Attorneys for amicus curiae, LCCR kfoxdavis@lccr.com	Andrea Auer, Esq. 1611 Telegraph Avenue Suite 1100 Oakland, CA 94612 Attorneys for amicus curiae aaue@averlaw.com
Andrew Steckler Alameda County Public Defender’s Office 1401 Lakeside Drive, Suite 400 Oakland, CA 94612 Attorneys for amicus curiae Andrew.steckler@acgov.org	

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- by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below, or as stated on the attached service list, on this date before 5:00 p.m.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Oakland, California addressed as set forth.
- by causing personal delivery by _____ of the document(s) listed above to the person(s) at the address(es) set forth below.
- by personally delivering the document(s) listed above to the person(s) set forth below.

Roy Johnson, Jr. In Propria Persona 886 52 nd Street Oakland, CA 94608	Bao Viet Ngo In Propria Persona 2140 Highland Road Pinole, CA 94806
Anthony Smith In Propria Persona 2717 Fruitvale Avenue, Apt. A Oakland, CA 94601	Anthony Price PFN BDE054 Santa Rita Jail 5325 Broder Boulevard Dublin, CA 94568
Brian Downing In Propria Persona 5206 Anapolis Avenue San Pablo, CA 94806	Derris Dillard In Propria Persona 5428 Market Street Oakland, CA 94608
Stephon Anthony PFN BGF001 Santa Rita Jail 5325 Broder Boulevard Dublin, CA 94568	Marcelus Collins CDCR #AC8843 San Quentin Reception Center 1 Main Street San Quentin, CA 94964
Darrel Easley Register #12506-111 Federal Correctional Institution Herlong P.O. Box 800 Herlong, CA 96113	Tyrone Elebeck In Propria Persona 843 44 th Street Oakland, CA 94608

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Donta Easley c/o Andrew A. Steckler Assistant Public Defender Alameda County Public Defender's Office 1401 Lakeside Drive, Suite 400 Oakland, CA 94612	Samuel Flowers PFN BFF551 Santa Rita Jail 5325 Broder Boulevard Dublin, CA 94568
Tyrone Jackson In Propria Persona 2341 Valley Street, #10 Oakland, CA 94612	Chanzae Johnson In Propria Persona 6620 Helen Court Oakland, CA 94608
Christopher Patrick PFN BCN624 Santa Rita Jail 5325 Broder Boulevard Dublin, CA 94568	Lucious Taylor PFN BDX204 Santa Rita Jail 5325 Broder Boulevard Dublin, CA 94568
Eric Tullis In Propria Persona 405 Sycamore, #10 Hayward, CA 94544	Rafael Campbell PFN BDE069 Santa Rita Jail 5325 Broder Boulevard Dublin, CA 94568

I am readily familiar with the City of Oakland's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 25, 2010, at Oakland, California.

BARBARA J. WOODS