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HOSPITALITY HOUSE; COALITION ON
HOMELESSNESS; AND FAITHFUL FOOLS

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ATTORNEYS FOR PROPOSED
INTERVENORS COALITION ON
HOMELESSNESS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

HASTINGS COLLEGE OF THE LAW, a public trust
and institution of higher education duly organized
under the laws and the Constitution of the State of
California; FALLON VICTORIA, an individual;
RENE DENIS, an individual; TENDERLOIN
MERCHANTS AND PROPERTY ASSOCIATION, a
business association; RANDY HUGHES, an
individual; and KRISTEN VILLALOBOS, an
individual,

Plaintiffs,

v.

CITY AND COUNTY OF SAN FRANCISCO, a
municipal entity,

Defendant.

Case No. 4:20-cv-3033-JST

**DECLARATION OF SARAH
MATTHIAS DENNISON IN
SUPPORT OF PROPOSED
INTERVENORS' MOTION
FOR INTERVENTION**

Date: July 22, 2020

Time: 2:00 P.M.

Place: Courtroom 6, Second Floor

Judge: Hon. Jon S. Tigar

Complaint Filed: May 4, 2020

Trial Date: None Set

Action Filed: May 4, 2020

1 I, SARAH MATTHIAS DENNISON (AKA Sam Dennison), declare:

2 1. I am the Co-Director of Faithful Fools, a non-profit organization and a Proposed
3 Intervenor in *Hastings College of the Law, et al. v. City & County of San Francisco*: Case No.:
4 4:20-cv-03033-JST. I make this Declaration in support of Proposed Intervenor's Motion for
5 Intervention.

6 2. The facts set forth below are known to me personally and are also based upon my
7 review of the files of the plaintiffs in this case. I have first-hand knowledge of these facts. If
8 called as a witness, I could and would testify competently, under oath, to such facts.

9 3. Faithful Fools is a live-work community organization based in the heart of the
10 Tenderloin District at 234 Hyde Street in San Francisco, California.

11 4. Our organization was established in 1998 by a Unitarian Universalist Minister and
12 a Franciscan who founded a community dedicated to deep personal change in the service of deep
13 social change. Its mission is to foster awareness and analysis of deteriorating social conditions in
14 the United States and the world at large, seen from the level of the streets, and to facilitate
15 individual and collective responses thereto. Our organization meets people where they are—
16 whether housed or unhoused— through arts, education, advocacy, and accompaniment. We
17 strive to raise awareness of the needs of unsheltered San Franciscans and to address racism and
18 fundamental human rights of people experiencing homelessness.

19 5. I am Co-Director of the organization, and I have been with Faithful Fools for nine
20 years. I both live and work at the organization. Our organization focuses on the needs of people
21 experiencing homelessness in the Tenderloin. I come to this work with personal experience,
22 having spent time as a homeless youth in the Tenderloin district in the early 1980's. When I was
23 living on the streets, I depended on the generosity of other individuals in the Tenderloin
24 neighborhood. I now dedicate my life full-time to providing that same generosity and sense of
25 community that was so important to me when I was experiencing homelessness.

26 6. Faithful Fools runs a number of programs for housed and unhoused Tenderloin
27 residents, including a weekly interfaith bible study session, writing workshops, movie nights,
28 street retreats, and community working groups. We also regularly assist our unsheltered

1 neighbors with meeting their immediate needs, whether it means connecting them to other
2 service providers, general problem solving, or providing other assistance. Every individual has
3 different needs and we try to meet them where they are in that moment.

4 7. During COVID-19 there has been an increase in the number of tents in the
5 Tenderloin district and within San Francisco in general. Prior to the pandemic, there were
6 approximately 700 tents throughout San Francisco, and now there are likely a few thousand.
7 Yet, I do not think it means that there was a huge rise in the number of homeless people in San
8 Francisco. Before the pandemic, although there were only 700 tents, it's been estimated that
9 between 7,000 to 9,000 people live on the streets of San Francisco at any given time. This
10 means that the majority of people who were on the streets before the pandemic were sleeping on
11 the concrete or somewhere without a tent. I believe this is partially a result of to the City's
12 practice over the last several years to remove tents from City streets. This pandemic made the
13 number of people who are living on the streets much more visible because of the distribution of
14 tents, distributed by homeless advocates such as Faithful Fools and other organizations. In other
15 words, the pandemic has made visible many of the things that were previously invisible, it does
16 not mean the number of people experiencing homelessness grew substantially.

17 8. The current situation is a complicated one and I understand that we are not going
18 to solve San Francisco's housing crisis in one day, or even in a couple of weeks. However, it is
19 frustrating when it appears that the City has great emergency plans in place for so many crises,
20 such as an earthquake or other natural disasters, but it is still struggling to respond to the
21 economic disaster that we have been facing for the last few decades, particularly homelessness. I
22 think that this has become especially apparent during the current COVID-19 health pandemic.
23 The City created clear plans and took concrete steps for housed residents, through its Shelter in
24 Place Orders and health recommendations, yet it largely failed to develop plans for unhoused
25 residents, including those in the Tenderloin. For example, in addition to the shelter in place
26 order, the City also closed various City streets so that people could walk, bike, and otherwise be
27 on outside more safely, but has failed to take similar steps in the Tenderloin. The City's
28

1 response has been too slow and seriously under-resourced. There have been a number of
2 proposed plans to address the situation, but few have been realized.

3 9. Faithful Fools has had to divert its resources to provide additional services to
4 unhoused individuals because of the City's inaction during the COVID-19 pandemic. We spent
5 approximately \$2,000 on tents for persons trying to shelter in place on the streets. We have
6 provided tents and sleeping bags to people released from jail and people discharged from the
7 hospital directly to the streets with very little other than their clothes. During the weeks it took
8 the City to formulate a plan to shelter the most vulnerable people in hotels, we located and paid
9 for hotel rooms for homeless individuals who are medically vulnerable and who could not risk
10 waiting for the City.

11 10. In one example, when we went to try and get a hotel room for a man with heart
12 troubles and schizophrenia, we had trouble finding a room because the City was leasing up
13 rooms and leaving many of them empty, but unavailable for other people who needed to rent
14 them. He was not eligible for the City Project Roomkey program, because at that time the
15 program only placed persons in hotels if they tested positive for COVID-19, or if the placement
16 was necessary to reduce the shelter population. This individual needed to get off the streets, and
17 it took several days to find him a place that was affordable and available.

18 11. Our organization has had to seek donations of masks, hand-sanitizer, and other
19 protective tools for our unhoused neighbors. After the City's shelter in place order went into
20 effect, Faithful Fools tried to connect with San Francisco's Emergency Operations Center to
21 bring services to the corner of Turk Street and Hyde Street, an area of the Tenderloin that is
22 particularly impacted by the increase in tents during the pandemic. We asked the City for
23 additional toilets, hand washing stations, and water to provide to unhoused persons in the
24 Tenderloin area. The City failed to adequately respond, and so we had to purchase water, hand-
25 sanitizer, and masks for unsheltered people residing on the streets. We ordinarily would have
26 used those fundraising resources to support our programs and other services.

27 12. When I heard about this lawsuit, filed by UC Hastings and other individuals,
28 Faithful Fools also spent resources advocating for the interests of unsheltered Tenderloin

1 residents. We joined the Coalition on Homelessness, Hospitality House, and 25 other homeless
2 advocates and service providers in that request for UC Hastings to sign a pledge. Specifically,
3 we asked Hastings for a commitment to protect, and include in any resolution of this case, the
4 civil and human rights of people experiencing homelessness. When we learned that UC Hastings
5 refused, I knew that Faithful Fools had an obligation stemming from our mission statement and
6 purpose to become involved in this lawsuit to represent the rights and interests of people
7 experiencing homelessness.

8 12. I believe there is a real risk that this lawsuit will result in the City moving large
9 numbers of people from place to place, exacerbating the trauma of homelessness that
10 compromises the physical and mental health of people experiencing homelessness. When people
11 lose access to their support networks and service providers, they often lose access to critical
12 medications for chronic health conditions (hypertension, diabetes, etc.) which can increase the
13 likelihood of death and disability. I work regularly with persons with disabilities, and this will
14 have a profoundly harmful effect on these individuals. For people with mental health conditions
15 disrupting access to services even for short periods of time increases the likelihood that they will
16 suffer serious acute episodes that can easily be prevented when they are in a stable location.

17 13. Reading the lawsuit, it was clear to me that the complicated and challenging
18 living conditions of the Tenderloin for unsheltered residents, that I see at Faithful Fools on a
19 daily basis, is not being represented or portrayed. People are struggling to live day-to-day,
20 especially during this pandemic. Any resolution of this lawsuit needs to involve organizations
21 that represent the interests of people experiencing homelessness in the solution.

22 14. For these reasons, Faithful Fools files this motion to intervene to make sure
23 unhoused Tenderloin residents' interests are protected.

24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct to the best of my knowledge. Executed on June 8, 2020 in San
26 Francisco, California.

27 

28 SARAH MATTHIAS DENNISON