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11 Attorneys for Plaintiffs

12 UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 HOUSING IS A HUMAN RIGHT,  
15 et al.,

Case No. 8:19-cv-00388 PA KES

16 Plaintiffs,

DECLARATION OF BROWN IN  
SUPPORT OF REQUEST FOR  
TEMPORARY RESTRAINING ORDER

17 v.

18 COUNTY OF ORANGE, et al.

Date: None  
Time: None  
Ctrm: 9A

19 Defendants.  
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Declaration of WILLIAM BROWN JR.

1. My name is William Brown Jr. All the facts stated below are true and I could testify competently to them if called as a witness.

2. I have been homeless in San Clemente for about three years. I am working with Orange County Health Care to try and get access to healthcare and housing.

3. I am disabled and have some difficulty getting around because I am legally blind. With my severe and progressive visual impairment, I often rely on others for assistance. Due to the new ordinance, I am afraid I will get cited or arrested for sleeping outside. I am using a broom as a seeing eye stick to make sure I do not crash when I walk.

4. I came to check the new camping area. Due to my disability, I struggled to find the entrance. The security guard had to come let me in. I tried to use the porta potty. Luckily, Maura (a volunteer) was there. She walked me to the bathroom and showed me the handwashing station. She warned me that the bathrooms were full so I did not sit on the full toilet. I could tell that if I had, I would have been touching people's waste.

5. I am working with Mercy House and hope to get an eye surgery soon. Until then, I will need to stay in places I am familiar with or that can accommodate my disability. This site is not appropriate for me. It has no protection from sun, wind, rain, or other elements. It is open space and, as I am unable to see well, that does not help me navigate the space. I am more vulnerable due to my disability so I need to know who stays in the area but here there is no service provider and I cannot select a spot directly next to a friend who can keep an eye out for me.

6. I returned to the sleeping location another day and was able to get a

1 spot. Despite the location being inappropriate for my disabilities, I am afraid I will  
2 be cited or arrested if I stay other places. After moving in, I asked the security  
3 guard to call and have the porta potty serviced because it was overflowing and  
4 particularly hard for me to use given my limitations.

5 7. The security guard explained that his phone was not holding a charge  
6 so he could not make any calls. I immediately realized that if there were an  
7 emergency, no one would be able to call for help. There is no source of power so  
8 my friends cannot charge their phones. Security does not have a working phone. It  
9 is very scary for someone with my limited visibility to be confined in a fenced-in  
10 area with only one exit, and no phone to call for help in an emergency. I am  
11 worried that I would be trapped in the event of a fire.

12 I declare under penalty of perjury that the forgoing is true and correct.

13 Executed on this 4<sup>th</sup> day of June 2019 in San Clemente, California.

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16 William Brown Jr.  
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