

EXHIBIT F

1 Paul Gattone
2 Arizona Bar #012482
3 Law Office of Paul Gattone
4 301 S. Convent
5 Tucson, AZ 85701
6 gattonecivilrightslaw@gmail.com
7 (520) 623-1922
8 *Attorneys for Proposed Intervenors*

9 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
10 **IN AND FOR THE COUNTY OF PIMA**

11 ALLISON BRADFORD; MICHAEL
12 CARLSON; and ADRIAN WURR,

13 Plaintiffs,

14 v.

15 CITY OF TUCSON, a body politic in the
16 State of Arizona,

17 Defendant.

18 COMMUNITY CARE TUCSON,
19 COMMUNITY ON WHEELS,

20 Proposed Intervenors

Case No. C20234363

**AFFIDAVIT OF ELIZABETH
CASEY**

(Honorable Greg Sakall)

- 21 1. My name is Elizabeth Casey. I am over the age of 18, am of sound mind, and am
22 competent to make this declaration. I submit this affidavit in support of the Motion to
23 Intervene in this matter under penalty of perjury and declare that the foregoing is true
24 and correct.
- 25 2. I am a community coordinator of Community Care Tucson, an organization that
26

1 provides charity, direct services, and support to the unhoused population in Tucson. I
2 have been with Community Care Tucson for over two-and-a-half years. I am part of
3 its core member group and have spent countless hours interacting with, listening to,
4 and responding to the needs of unhoused people in Tucson.
5

- 6 3. Community Care Tucson is a community-led unincorporated service and advocacy
7 organization that provides life sustaining supplies, human connection, and dignity to
8 our unhoused neighbors.
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- 10 4. Community Care Tucson was formed in 2020 by a small group of Tucson residents in
11 response to the housing insecurity that resulted, in part, from the COVID-19
12 pandemic. Volunteers with Community Care Tucson dedicate their time to assist the
13 community by handing out food and necessary supplies to those in need.
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- 15 5. The individual members of Community Care Tucson joined together based on mutual
16 consent to show our unhoused neighbors that they deserve care, compassion, dignity,
17 and safety. We still operate with that common purpose today.
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- 19 6. Community Care Tucson takes on many roles. Community Care Tucson meets a
20 vulnerable population where they are, and responds to the urgent needs that are not
21 met by Tucson itself or other local and state government organizations.
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- 23 7. Community Care Tucson operates a weekly distribution in Armory Park on
24 Wednesdays. Community Care Tucson purchases and hands out necessary goods for
25 unhoused people's daily survival, including safety supplies, clean needles, first aid,
26 clothing, blankets, handwarmers, food, snacks, and hydration.

- 1 8. Community Care Tucson, alongside Community on Wheels, also operates a weekly
2 mobile distribution on Sundays. This mobile distribution operates in, and moves
3 around, downtown Tucson. It provides essential supplies and support to unhoused
4 people who reside throughout Tucson, and who may not be able to reach the other
5 weekly distributions due to transportation or other unmet needs.
6
- 7 9. Community Care Tucson partners with other organizations and volunteers to obtain
8 items and services for unhoused people in Tucson. These organizations include direct
9 service providers and mutual aid organizations who also serve unhoused people
10 throughout Tucson, including at Navajo Wash.
11
- 12 10. Community Care Tucson also picks up donated goods, recruits new volunteers,
13 participates in fundraising activities, and connects unhoused people to services at their
14 request.
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- 16 11. By its activities, Community Care Tucson has created a network of unhoused people
17 in Tucson who rely on the services it provides.
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- 19 12. Community Care Tucson also operates a weekly mobile distribution, alongside
20 Community on Wheels, on Sundays in downtown Tucson where many unhoused
21 residents spend time.
- 22 13. Through this mobile distribution, Community Care Tucson is able to assist unhoused
23 people in Tucson who may not be in Armory Park on Wednesdays.
24
- 25 14. Based on my interaction with unhoused people in Tucson, the unhoused population is
26 widely distributed, transient, and relocates between parks and washes in Tucson.

- 1 15. These parks and washes include Santa Rita Park, Armory Park, and Navajo Wash
2 park, as well as other encampment sites throughout Tucson.
- 3
4 16. This population relocates so often because of sweeps conducted by the City of
5 Tucson. City officials who conduct these sweeps threaten unhoused people with
6 arrest, disperse those who may have nowhere else to go, and often cause the loss of
7 personal property.
- 8
9 17. These sweeps target people who lack adequate shelter. Tucson's ill-informed policies
10 have led to dire circumstances for unhoused people in Tucson, such as being forced to
11 reside outside in parks or washes without proper material support, health, and
12 wellness support.
- 13
14 18. The sweeps occur at all hours, day and night. Reports of people being dragged out of
15 their tents without shoes are not uncommon.
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17 19. As recently as November 19, 2023, Community Care Tucson served an unhoused
18 person who experienced being pushed out of Navajo Wash Park within this past year
19 by Tucson police.
- 20
21 20. I also received reports from unhoused people that Tucson conducts sweeps ahead of
22 popular tourist events, such as the Tucson Gem Show.
- 23
24 21. Once unhoused people are threatened with arrest and removed from public space,
25 Tucson often uses tractor trailers to destroy the property that the unhoused people are
26 forced to leave behind.
22. Based on my experience responding to the needs of unhoused people after a sweep,

1 Tucson fails to notify the unhoused before they conduct sweeps.

2 23. Multiple unhoused people have expressed to me that they have lost their property
3 after a sweep. I have been told that Tucson has bulldozed multiple encampment sites
4 with a tractor trailer post-sweep.

5
6 24. Community Care Tucson has developed a trusting relationship with many unhoused
7 people in Tucson, including those who stay in Armory Park, Santa Rita Park, Navajo
8 Wash Park, and other parks and washes throughout Tucson. We interact with many
9 of the same people every week.

10
11 25. Community Care Tucson's activities are continually frustrated by Tucson's ongoing
12 sweeps of its parks and encampments where unhoused people reside.

13 26. In preparation for sweeps, Community Care Tucson does outreach to unhoused people
14 to warn them and try to minimize harm to their persons and property.

15
16 27. After a sweep, Community Care Tucson has to track down and reestablish
17 connections with unhoused people to provide them with services and life-sustaining
18 necessities, which Community Care Tucson, otherwise would not have to do.

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20 28. Community Care Tucson spends money to replace property that was destroyed in
21 sweeps, including blankets (to keep people warm) and duffle bags (to store people's
22 property).

23
24 29. Community Care Tucson also spends money to house people who otherwise have
25 nowhere else to go, either because of sweeps or the lack of adequate shelter in
26 Tucson. Over Labor Day 2023, we bought a four-day hotel stay for two women and

1 their two children after every domestic violence shelter told them the shelters were
2 full.

3
4 30. Outside of providing material support and responding to Tucson's sweeps,
5 Community Care Tucson also solicits feedback from unhoused people and responds
6 to their requests to fit their individual needs. By doing so, Community Care Tucson is
7 best able to respond to immediate concerns and address crises that arise.

8
9 31. Based on my conversations and experience assisting unhoused people, many cannot
10 obtain shelter in existing Tucson homeless shelters for various reasons. These include
11 that unhoused people do not want to be torn away from their community, partners,
12 and friends, yet shelters often require this and limit people's access to their
13 communities and partners. That unhoused people do not want to give up their pets,
14 some of whom are kept for emotional support, yet shelters often limit people's access
15 to their pets. That the sobriety requirements are difficult for those with substance
16 abuse illnesses. That you cannot use cellphones inside some shelters. That you are
17 required to leave some shelters during the day. That many shelters do not allow
18 children. And that many shelters have curfew requirements that impact when people
19 can leave, and thus force people to choose between shelter and a job.

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22 32. These issues are all on top of the lack of adequate shelter space and beds itself.

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24 33. Multiple unhoused people have told me that Tucson's "housing assessments," which
25 are supposed to place unhoused people in housing, has not materialized. Just last
26 week, one unhoused person told me they filled out the assessment a year ago and have

1 not heard back.

2 34. I have also heard from women who flee domestic violence that there is no available
3 room in domestic violence shelters.

4 35. Through my work at Community Care Tucson, I have become aware that housing
5 options that allow and encourage unhoused people to seek shelter are critical. Tucson
6 lacks these. For example, Tucson operates Deep-Freeze shelters, but currently opens
7 them up in only two scenarios: (1) when it is forty degrees or below and it is raining,
8 or (2) when it is thirty-five degrees or below. Not only are these temperatures too
9 low—Tucson has had sixteen environmental element deaths in its houseless
10 population this year—but there are not enough Deep-Freeze shelters.

11 36. Additionally, for those individuals who reside in public space with no adequate
12 shelter, more material support is necessary. Based off my experience, material
13 support may also alleviate some of the alleged concerns Tucson residents allege
14 regarding unhoused people.

15 37. For example, unhoused people are in desperate need of emergency blankets, hats,
16 gloves, and socks. Socks are all the more important because of the rain that unhoused
17 people cannot avoid.

18 38. Unhoused people also need mobile showers and public bathrooms. While Tucson
19 owns a mobile shower trailer, there is only one trailer with just a few showers in it,
20 they are often broken, and they are not available at all times. Tucson lacks any public
21 bathrooms, either in the parks where unhoused people reside or even outside.

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39. Unhoused people also need laundry services, which are only available for unhoused people, and only for women, at one shelter, in Tucson.

40. Furthermore, unhoused people in Tucson need storage facilities. Many unhoused residents tell me that they cannot seek work because they may lose their property if it is left unattended. While the Tucson public library has lockers, there are only twenty of them and they are very small.

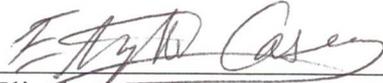
41. Finally, unhoused people need additional support including garbage disposal, park cleanups, mobile medical care stations, and peer support to guide them through challenging times.

42. Based on my experience, these services are necessary because unhoused people, who often have nowhere else to go, cannot avoid the consequences of being human, including waste excretion, seeking shelter in public spaces, storing belongings in public spaces, cleaning themselves in public spaces, and forming community in public spaces, absent these services.

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43. Based on my experience and the interactions I have had with the unhoused population in Tucson, Tucson should address these above-listed needs to avoid further harm to unhoused people themselves without criminalizing them for being unhoused. While this is not an exhaustive list, it would be a start.

Date: December 12, 2023
Tucson, Arizona


Elizabeth Casey

