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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 CARES TUCSON,
19 COMMUNITY ON WHEELS,

20 Proposed Intervenors

Case No. C20234363

**AFFIDAVIT OF VICTORIA
DEVASTO**

(Honorable Greg Sakall)

- 21 1. My name is Victoria DeVasto. 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 and declare, under penalty of perjury, that the foregoing is
24 true and correct.
- 25 2. I am the co-founder and current community coordinator of Community on Wheels.
- 26

1 We are a group of Tucson residents and community members who engage in mutual
2 aid, direct service provision, and advocacy on behalf of unhoused residents of Tucson.

3
4 3. Community on Wheels is a community-led organization whose objective is to provide
5 essential items, services, and advocacy for unhoused individuals in Tucson while
6 developing a trusting relationship with them. We seek to build and maintain
7 community with all residents of Tucson, without casting the vulnerable aside.

8
9 4. Community on Wheels was formed in 2020 by me and another Tucson resident in
10 response to the housing insecurity and food scarcity that resulted from the COVID-19
11 pandemic. At the outset, I bought a van that Community on Wheels used to reach
12 people throughout Tucson and to distribute food to them. Today, we have additional
13 members and continue to use the distribution van to reach unhoused people
14 throughout Tucson.

15
16 5. Community on Wheels is composed of community volunteers who come together in
17 solidarity with their unhoused neighbors in Tucson. Together, we source donations,
18 pick up donated goods, set up the weekly distribution events, and travel around
19 Tucson to provide essential services for unhoused people.

20
21 6. We also engage in advocacy on homelessness issues, particularly the increasing lack
22 of affordable housing in Tucson. We have a social media presence on several
23 platforms that connects our community to each other, we organize protests demanding
24 reform to Tucson's inadequate response to homelessness, and we encourage our
25

1 members to contact their elected leaders and show up at Tucson City Council
2 meetings to demand the same.

- 3
- 4 7. Beginning in December 2020, Community on Wheels has operated a weekly
5 distribution in Santa Rita Park. The purpose of these weekly events is twofold: to
6 distribute meals and other necessities, and to build community with our unhoused
7 neighbors. We distribute essential items including hygiene products, food, and water.
8 This weekly distribution reaches around fifty to seventy people each week.
- 9
- 10 8. This weekly distribution requires preparation throughout the week. Community on
11 Wheels purchases supplies and spreads the message of the distribution drive to
12 unhoused people, and other volunteers, to ensure that they show up on Saturday to
13 receive and distribute supplies, respectively.
- 14
- 15 9. Community on Wheels also operates a weekly mobile distribution on Sundays,
16 alongside Community Cares Tucson, which travels around downtown Tucson where
17 many unhoused people spend time.
- 18
- 19 10. Through this mobile distribution, Community on Wheels can assist unhoused people
20 in Tucson who may not be in Santa Rita Park on Saturdays.
- 21
- 22 11. During all these distributions, we speak to the unhoused people that we serve, who
23 relate their stories to us and update us on their lives.
- 24
- 25 12. Based on my interaction with unhoused people in Tucson, unhoused people in Tucson
26 are widely distributed, transient, and often relocate between different parks and

1 washes.

- 2 13. These parks and washes include Santa Rita Park, Armory Park, and Navajo Wash
3 Park, as well as other encampment sites throughout Tucson.
4
- 5 14. We also partner with other organizations and local businesses to provide other
6 services to unhoused people in Tucson. Based on my interactions with these
7 organizations and local businesses, they have done, and plan to continue, direct
8 outreach in Navajo Wash Park.
9
- 10 15. These services include harm reduction services and housing support.
- 11 16. Community on Wheels organizes monthly Naloxone trainings in downtown Tucson,
12 which are necessary because of the increase in overdose deaths of unhoused
13 individuals throughout Tucson. In fact, I have recently responded to, and reversed,
14 five overdoses in Santa Rita Park. These monthly trainings are attended by residents
15 of Tucson, both housed and unhoused. These trainings are critical because unhoused
16 people, alongside community volunteers, are each other's support system.
17
- 18 17. Community on Wheels also assists unhoused people to fill out housing assessments,
19 which are supposed to place unhoused people in housing.
20
- 21 18. While Community on Wheels seeks to continue the distributions and provide these
22 services, our activities are continually frustrated by Tucson's ongoing sweeps of its
23 parks and encampments where unhoused people reside.
24
- 25 19. Based off my interaction with unhoused people, these sweeps threaten unhoused
26

1 people with arrest, who have no adequate shelter to return to, and disperse them
2 throughout Tucson. I am told these sweeps often occur without notice.
3

4 20. I have heard reports of police entering tents without cause, running identity checks,
5 and arresting anyone who may have outstanding warrants.

6 21. Tucson's sweeps scatter unhoused people across Tucson, bar them from entering
7 parks that we rely on for central distributions, and discourage them from obtaining
8 necessary services.
9

10 22. I have been informed several times that Tucson residents needing services could not
11 access the distributions run by Community on Wheels because they were displaced by
12 Tucson's sweeps.
13

14 23. After a sweep, Community on Wheels has to track down and reestablish connections
15 with unhoused people to provide them with services and life-sustaining necessities,
16 which we otherwise would not have to do.
17

18 24. There have been multiple instances where we have been unable to track down an
19 individual, only to later learn they were jailed or hospitalized. These sweeps therefore
20 impact our provision of services to unhoused people and threaten the community
21 relationships we build.
22

23 25. Community on Wheels has also been forced to spend money to replace personal
24 property that was lost or destroyed due to sweeps. These include tents, sleeping bags,
25 tarps, and other essential items.
26

- 1 26. Based on my experience interacting with, and building relationships with, unhoused
2 people who reside outside in Tucson, many need services and material provisions that
3 Tucson fails to provide.
4
- 5 27. These include adequate and available shelter, public showers, public bathrooms,
6 laundry services, storage facilities, garbage bins, adequate park clean-up, outreach
7 teams, and essential items, such as basic hygiene products and, at the moment,
8 supplies to stay warm in the winter.
9
- 10 28. Unhoused people in Tucson also need harm reduction supplies, including safe use
11 supplies such as clean needles and sharps deposit boxes as well as safe use sites.
12 These are currently unavailable where unhoused people reside.
13
- 14 29. Unhoused people also need additional garbage disposal sites, including garbage cans
15 in parks and washes throughout Tucson.
16
- 17 30. Based on my experience, unhoused people, who often have nowhere else to go,
18 cannot avoid the consequences of being human, including waste excretion, seeking
19 shelter in public spaces, storing belongings in public spaces, and cleaning themselves
20 in public spaces, without the provision of resources and services by Tucson.
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31. Based on my experience and the interactions that I have had with unhoused people in Tucson, Tucson should address the above-listed needs of unhoused people to avoid further harm to unhoused residents without criminalizing them for being unhoused.

While this is not an exhaustive list, providing it would be a start.

Date: December 12, 2023
Tucson, Arizona



Victoria De Vasto