

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

COUNTY OF OCEAN, et al. Plaintiffs, v. GURBIR S. GREWAL, et al., Defendants. AND ROBERT A. NOLAN, et al., Plaintiffs, v. GURBIR S. GREWAL, et al., Defendants.	CONSOLIDATED CIVIL ACTION NO. 3:19-CV-18083-FLW-TJB DECLARATION OF MICHAEL A. GAIMARI, SR., CHIEF OF POLICE OF BRIDGETON, NEW JERSEY, IN SUPPORT OF DEFENDANTS' BRIEF IN OPPOSITION TO PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION
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I, MICHAEL A. GAIMARI, SR. declare as follows:

1. I am the Chief of Police for the City of Bridgeton, New Jersey.
2. I have been a police officer in Bridgeton for 32 years. For 22 of those years, I worked as a Detective, Detective-Sergeant, and Detective-Lieutenant, and carried out criminal investigations. On two occasions, the Department dispatched me to serve in a supervisory capacity on the

Cumberland County Narcotics Task Force and Organized Crime Bureau. I have served as Chief of Police since 2015.

3. I submit this declaration in support of Defendants' brief in opposition to Plaintiffs' motion for a preliminary injunction. I am familiar with the matters set forth herein, either from personal knowledge or on the basis of documents and information that I have reviewed.
4. As Chief of Police, I oversee a Department of 82 employees, including 65 full-time officers, 3 Class II officers, 1 animal control officer, 7 telecommunications officers, and a civilian staff of 6. My Department is committed to providing the highest quality of law enforcement services in order to protect the safety and welfare of approximately 25,000 residents. Bridgeton is an ethnically diverse community and includes a substantial population of first-, second-, and third-generation immigrants from Mexico and Central America.
5. Our main priority as law enforcement officers is to deter and solve crime and bring criminals to justice. Based on my training and experience, it is my opinion that access to information, including information from members of the public, is a fundamental component in preventing and solving crime. I also believe this to be a proposition with which any law enforcement professional would agree. Both quantity and quality of

- information matters. To solve and prevent criminal activity, we aim to obtain the most information, and the most accurate information, possible.
6. Based on my training and experience, it is my opinion that a critical tool for obtaining access to more information, and more accurate information, is building and maintaining trust among our community members, who would be a primary source of that information.
 7. Over my 32-year career with the Bridgeton Police Department, I have seen the problems that arise when members of the public are afraid to cooperate with police either due to fear of retaliation from the offenders, or, in this case, fear of deportation. On many occasions, we received calls from people who either were alleged victims of crime or had information pertaining to a criminal investigation. However, out of fear of being contacted again by police—and potentially bringing attention from immigration authorities to themselves, family members, or neighbors—they many times would offer aliases and/or inaccurate address information, preventing officers/detectives following up with them and hindering a number of investigations. Sometimes those people eventually are identified, and sometimes they are not. When we cannot verify or follow up on the information provided by a member of the public, it often is of little use to a criminal investigation causing a substantial number of these

investigations to be left unsolved empowering those who are committing these crimes to continue conducting criminal activity. Additionally, the criminal element committing these crimes, in most cases both armed and strong-armed street robberies, frequently have the awareness that the victims they prey on may not cooperate with authorities increasing the chances of them not being brought to justices. Unfortunately information received from those that are arrested and informants on the street indicate these victims are commonly referred to as “walking ATMs” by those committing these crimes.

8. Over the past several years, and as a result of this concern, Bridgeton has carried out a number of initiatives designed to build community trust, and ultimately to help make our community more safe. It therefore welcomed the Attorney General’s issuance of Directive 2018-6, also known as the Immigrant Trust Directive, which helps us build that trust.
9. After the Directive was issued, we held a community outreach meeting in Bridgeton to explain its purpose and content. The meeting allowed us to explain that our primary concerns are crime-solving and public safety, not turning our residents over to immigration authorities.
10. We held a second such meeting with the community in December 2019. We were pleasantly surprised by the highly positive feedback we received

from leaders from churches and other local community groups, as well as local advocates. It was apparent that the highly positive feedback from the December 2019 meeting was the result of the Directive having been in effect over the several prior months and in addition to the department's efforts, and it was a strong sign that we were having success in developing a more cooperative relationship between Bridgeton police and Bridgeton residents.

11. The Directive helps my officers to solve crimes. In order to arrest, charge, and ultimately convict criminals, we need the assistance of witnesses and victims. As stated above, it has been my experience that undocumented immigrants, or their family or friends, avoid talking to law enforcement out of fear of deportation, even when they are the victims of crime. The Directive provides us with the authority we need to calm those fears and allow witnesses and victims to participate in the criminal proceedings.

12. The Department's policy is not to ask any victim or witness about their immigration status, and therefore our officers would not know if someone is undocumented or not. We now can advise and remind the community that not only is this the Department's policy, but one mandated Statewide by the Attorney General's Directive.

13. The importance of the Directive in Bridgeton became especially clear this

fall. Local, regional, and national media have extensively covered the September 2019 disappearance of a five-year-old girl, whose grandparents were immigrants. She was taken from a park in Bridgeton and has been missing ever since. For a case like this, the Directive has allowed us to reassure undocumented immigrants in Bridgeton and in the surrounding communities who may be familiar with her whereabouts or have helpful information that it is safe to come forward to their local police officers. Even with the efforts of investigators in assuring the public, there remains hesitancy among the immigrant population to cooperate with authorities and investigators still wholeheartedly believe there is information vital to the investigation within this population. Any court-imposed reversal of this Directive would deal a crucial blow in the continued investigation into this child's disappearance.

14. In recent years, we have turned a corner in community trust-building—which I attribute in large part to the Directive. I have observed victims and witnesses become more forthcoming with information, provide more accurate descriptions of suspects, and make themselves more available to participate in photo spreads, line-ups, and investigations. The Directive is a key tool in our crime-fighting arsenal.

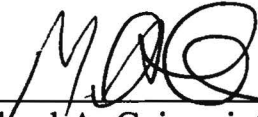
15. Based on my training and experience, it is also my opinion that any claim

that the Directive undermines public safety is inaccurate. I have not seen any indication that my community has been made less safe since the Directive went into effect.

16. Based on my training and experience, it is my opinion that undermining the Directive at this stage would undo several years' worth of efforts my Department invested into building and maintaining trust within the community. If, as a consequence of this, my Department begins to receive less information, or less accurate information, concerning current or future criminal investigations, that would make the community less safe.

I declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct to the best of my personal knowledge.

Executed on January 20, 2020.



Michael A. Gaimari, Sr.
Chief of Police
City of Bridgeton