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10 Attorneys for Plaintiffs,
THE PEOPLE OF THE STATE OF CALIFORNIA,
11 and Real Party in Interest,
THE CITY AND COUNTY OF SAN FRANCISCO
12

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF SAN FRANCISCO

15 UNLIMITED JURISDICTION

16 THE PEOPLE OF THE STATE OF
CALIFORNIA, acting by and through San
17 Francisco City Attorney Dennis J. Herrera,

18 Plaintiff,

19 vs.

20 MARTIN R. GUAJARDO; CHRISTOPHER
STENDER; IMMIGRATION PRACTICE
21 GROUP; and DOES 1 through 20, inclusive,

22 Defendants.
23
24

Case No.

**DECLARATION OF JAGDEEP SINGH IN
SUPPORT OF THE PEOPLE'S APPLICATION
FOR PRELIMINARY INJUNCTION**

25 1. My name is Jagdeep Singh. I was born in India. I came to the United States without
26 inspection in 1999.
27

1 2. After I arrived in the United States I met and married Kulwinderjit Kaur. My wife has a green
2 card and expects to obtain United States citizenship soon.

3 3. We have two sons who are United States citizens. They are four and seven years old.

4 4. We live in Pleasant Hill, California. I work as a cashier in a liquor store.

5 5. I applied for political asylum in 2000 and it was denied. I subsequently applied for voluntary
6 departure. That was granted.

7 6. I first met Martin Guajardo in March 2007.

8 7. I was detained by ICE from December 2006 to March 2007. While I was in ICE custody my
9 brother-in-law and uncle went to Guajardo for legal advice about my case because they had heard he
10 was a good lawyer in the Punjabi community. Guajardo told them that he would get me out of jail, get
11 me a green card, and win my case.

12 8. I went to meet with Guajardo at his office at 555 Clay Street in San Francisco the day after I
13 was released from ICE custody in March 2007. Guajardo told me that he could get me political
14 asylum.

15 9. Later, Guajardo told me that he could get me a green card through my wife.

16 10. I have since been informed that I would have had a better chance of adjusting my status if I had
17 voluntarily left the United States and tried to apply for a green card from India.

18 11. I terminated my relationship with Guajardo on August 16, 2010. My wife and I were frustrated
19 because Guajardo kept making promises about what would happen in my case but he didn't do
20 anything. I went to see a new lawyer, Cara Jobson, on the same day. Ms. Jobson recommended that I
21 voluntarily leave the United States and apply for relief from India. I will be leaving the United States
22 on August 27, 2010.

23 12. Between March 2007 and August 2010 my wife and I paid Guajardo a total of \$95,000. We
24 borrowed some of this money from my brother-in-law. We used up all the savings we had paying
25 Guajardo. After I retained Guajardo I would pay much of my salary towards his legal bills.

1 13. We made some of the payments in cash and some by credit card. We always gave the money
2 directly to Guajardo.

3 14. Guajardo never told me or my wife, either orally or in writing, that he was no longer an
4 attorney or that he had resigned from the state bar with charges pending.
5

6 15. No one else at IPG, including Christopher Stender, ever told me or my wife, either orally or in
7 writing, that Guajardo was no longer an attorney or that he had resigned from the bar with charges
8 pending.

9 16. When Guajardo's law office became Immigration Practice Group, Guajardo never told me it
10 was because he was no longer a lawyer. He told me that it was because he was expanding his practice.

11 17. At some point I heard from others in the Punjabi community that Guajardo had lost his law
12 license. When I asked Guajardo about this, he told me the suspension was only for one or two months.

13 18. I continued to ask Guajardo about his license. He told me inconsistent things. He told me not
14 to worry about it and that "these things happen." He told me "I'm still you're attorney and I'll take
15 care of your case."

16 19. Guajardo made promises to me about my case up through August 2010. He told me not to
17 worry and that I would be able to stay here with my wife and kids.

18 20. Guajardo also told me that because I had appealed my case when I hired him, my voluntary
19 departure got stayed. I asked him about this almost every time I saw him. Even on August 16, 2010
20 he told me I still had days left in which I could voluntarily depart.

21 21. My wife sat in on some, but not all, of the meetings I had with Guajardo.

22 22. Guajardo recorded the conversation during our meetings with an audio recording device. I am
23 not sure if the recorder was on for the entire time throughout our meetings.

24 23. I met with Guajardo about every two months from March 2007 to August 2010. He would call
25 me and tell me to come in and meet with him. Sometimes we waited for three to four hours to see
26
27

1 him. He didn't seem to know the details of my case very well. He asked me to pay him more money
2 every time I came to meet with him.

3 24. There was usually another person or two people present every time I met with Guajardo. I did
4 not know who these people were. They never said anything of us. They usually sat at the computer
5 and worked on the computer. Guajardo talked to us about our case, gave us advice, and talked about
6 his legal strategy. I thought that Guajardo was in charge of the other attorneys.

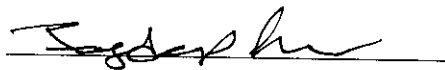
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8 25. I met another lawyer who worked with Guajardo named Christopher Stender. He sat in on
9 some of our meetings with Guajardo but he never said anything to us. I never spoke directly to him.

10 26. Guajardo usually spoke to the other people in Spanish. I do not speak or understand Spanish.

11 27. Several months ago, my brother-in-law, Harry, came to a meeting with Guajardo. Harry
12 speaks Spanish. While we were in the conference room with Guajardo, Guajardo called someone on
13 the phone. Guajardo told the other person in Spanish not to use any English words because I was
14 being a pain. My brother in law said they were talking about how much time I had left. Guajardo said
15 another appeal would give me six months but the other person on the phone said in Spanish it would
16 probably be two weeks.

17 28. Up through the last time I saw him, Guajardo told me not to worry and that he would get me a
18 green card. This week before I leave for India I had to move my wife and children out of our home
19 and in with her brother because I will no longer be able to work here and support them.

20
21 I declare under penalty of perjury that the foregoing is true and correct and was executed on
22 August 24, 2010 at San Francisco, California.

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24 

25 Jagdeep Singh