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 NATIONAL ABORTION FEDERATION

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

NATIONAL ABORTION FEDERATION,

Plaintiff,

v.

BIOMAX PROCUREMENT SERVICES LLC,
 THE CENTER FOR MEDICAL PROGRESS,
 DAVID DALEIDEN (aka "ROBERT SARKIS"),
 and TROY NEWMAN,

Defendants.

Case No. 3:15-cv-3522

Judge:

**DECLARATION OF MARK
 MELLOR IN SUPPORT OF
 NATIONAL ABORTION
 FEDERATION (NAF)'S MOTION
 FOR A TEMPORARY
 RESTRAINING ORDER AND
 PRELIMINARY INJUNCTION**

1 I, MARK MELLOR, declare as follows:

2 1. My name is Mark Mellor. I make this Declaration in Support of National Abortion
3 Federation's (NAF's) Motion for a Temporary Restraining Order and Preliminary Injunction. I
4 have personal knowledge of the facts set forth in this declaration, unless otherwise indicated, and
5 if called to testify, I could testify competently thereto.

6 2. I am a Security Consultant who directs the Security Program at the National
7 Abortion Federation (NAF). Prior to joining NAF in September of 2013, I worked for a national
8 security provider, specializing in high risk security events and close protection duties for nine
9 years. In this role I was responsible for security and protective intelligence for the host
10 broadcasting network for the 2010 Winter Olympics. From 2007-2013, I provided private
11 security for Vancouver physician Gary Romalis, an abortion provider who survived two attempts
12 on his life by anti-abortion extremists. In 1994, Dr. Romalis suffered a severe gunshot wound to
13 his left thigh, and six years later in 2000, he was stabbed. Both injuries could have been fatal.

14 3. Throughout my career, my experience has been concentrated in providing
15 specialized security services, including threat risk assessments and physical security of buildings,
16 and providing advice on security solutions. I was introduced to NAF meetings through my
17 position with Dr. Romalis and began working with the onsite conference security team in 2007.

18 4. I led the Security detail team for NAF's 2012 Annual Meeting in Vancouver
19 before directing the NAF Security Department in 2013. I was personally responsible for
20 overseeing security at our 2014 Annual Meeting in San Francisco, and 2015 Annual Meeting in
21 Baltimore.

22 5. NAF implements a multi-faceted program to help ensure the security of our
23 members and safe access to reproductive health care clinics. As part of the NAF Security team, I
24 provide 24/7 emergency assistance to NAF members, conduct trainings and security assessments
25 of facilities and homes, support our members during large-scale protests occurring throughout the
26 U.S. and Canada, respond to individual security incidents at member facilities, convene
27 community law enforcement briefings, monitor anti-abortion activities, and protect attendees at
28 NAF meetings.

1 6. The safety and security of NAF meeting attendees is of the utmost importance to
2 NAF. We go to great lengths to ensure a safe, secure, and intimidation-free environment for
3 Annual Meeting attendees each year, and have security measures in place that are not common at
4 other conferences. These security precautions start long before the actual conference begins.
5 NAF's Security Department is involved in the selection process for conference hotels in order to
6 ensure that sites meet our strict security guidelines. When screening sites, we prioritize the
7 location and floor of meeting space, and the ability to secure NAF meeting rooms and restrict
8 access from others in the hotel. We often reject hotel sites for security reasons. Once a site is
9 selected, my department implements a comprehensive security plan for each conference.

10 7. NAF goes to great lengths to make sure that the dates and locations of our
11 meetings do not fall into the wrong hands. Unlike most other organizations, we do not post
12 information about our meeting dates and locations on our public website, and only give this
13 information out to members and trusted others. All emails about the conference remind recipients
14 to: "Please be mindful of security concerns and do not forward this email or share information
15 about NAF meetings." We email a security reminder to all registered attendees the week before
16 the meeting, reminding them not to post their travel plans or information about the meeting on
17 social media. Attendees are prohibited from posting information related to content and/or the
18 location of NAF's Annual Meeting on social media of any kind. This is communicated to
19 attendees in the security reminder email, in the conference Final Program, and through signs
20 posted at the registration booth and throughout the meeting space. Media representatives are
21 regularly not allowed at NAF meetings, and media personnel are not informed about the meeting.

22 8. In advance of our meetings, NAF security staff travel to the meeting site at least
23 once in order to assess the security risks and needs at the hotel and the surrounding area. I visited
24 the Westin St. Francis in San Francisco on September 18, 2013 and the Hyatt Regency Baltimore
25 two times: December 10, 2014 and January 30, 2015. During these advance meetings I met with
26 hotel management and hotel security to discuss security issues and explain the overall plan we
27 would implement and how hotel security would be integrated into that plan. I also coordinated
28 with local police officials, FBI, and fire and rescue personnel to review security issues, potential

1 threats, and the security needs of NAF members. NAF employed security officers for the onsite
2 conference security team, including hotel security, security staff from partner organizations, and
3 off-duty local law enforcement officers.

4 9. NAF security staff typically arrive prior to the beginning of each conference to set
5 up the security team and their assignments; orient security staff about procedures and protocols;
6 arrange for the safe receipt of mail and packages at the hotel; and finalize the involvement of K-9
7 teams. For the 2014 and 2015 Annual Meetings, I arrived in San Francisco on Thursday,
8 April 3, 2014 and Baltimore on Thursday, April 16, 2015.

9 10. During the conferences, I supervised the onsite security team and was available on
10 a 24/7 basis in case any issues occurred. My team and I worked with K-9 security personnel to
11 patrol NAF meeting space and the Exhibit Hall with explosive detector dogs.

12 11. Upon arrival, each attendee must show photo ID and sign a confidentiality
13 agreement before obtaining their meeting materials and gaining access to meeting areas.
14 Attendees are given a name badge, which they must wear in order to enter any NAF meeting
15 rooms. Throughout the entire conference, we have security officers posted at strategic locations
16 throughout the meeting areas and outside entrances to meeting rooms. One of their primary
17 responsibilities is checking to ensure that everyone entering a meeting room is wearing a NAF
18 badge. Security staff will restrict access to meeting areas for anyone without a visible NAF badge.

19 12. During the conference, all signage uses a version of the NAF logo, which omits
20 the words "National Abortion Federation" so that non-meeting attendees in the hotel are not
21 alerted to NAF's presence. We also work with the hotel to make sure that our full name is not
22 listed in any public hotel schedules or bulletins. Attendees and staff are advised to remove their
23 conference badges when they leave the meeting areas, including in elevators, in order to decrease
24 the chances of non-meeting attendees learning about the meeting.

25 13. For security reasons, NAF does not allow luggage or large bags to be brought into
26 meeting or event rooms. Meeting attendees must make arrangements to store luggage in their
27 hotel room or with the hotel concierge who is alerted to the need for extra baggage handling
28 personnel on the last day of NAF's meeting.

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14. There is a reminder of NAF’s unique security guidelines in each Annual Meeting Final Program, and attendees are advised:

- You must wear your meeting badge at all times during the meeting, including all day and evening sessions and receptions/social events.
- You should remove your name badge when you leave the meeting area(s) within the hotel; including elevators, and when you leave the hotel.
- Stay alert and aware of your surroundings both in the hotel and around the conference city.
- When in your hotel room, please store your meeting materials out of sight.
- Keep personal information (e.g., hotel room number, phone number) confidential.

15. Since the videotapes were released, we have advised our members to be on heightened alert and to contact our Security Department with any concerns. We have seen an increase in “off hour” correspondence with our members. We have also worked with the security in the building where the NAF office is located to make sure they are following strict protocols for admittance to our floor. Additionally, I have been in contact with the hotel management and hotel security staff for our next two U.S. meetings to let them know that information about our dates and locations has been compromised, and that we may need to take additional security precautions for those meetings.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 30 day of July, 2015 at Washington, D.C.



MARK MELLOR