

1 ARNOLD & PORTER LLP  
 SHARON DOUGLASS MAYO Bar. No. 150469  
 2 90 New Montgomery Street, Suite 600  
 San Francisco, California 94105  
 3 Telephone: (415) 365-3000  
 Facsimile: (415) 356-3099  
 4 E-mail: sharon.mayo@aporter.com

5 Attorneys for Defendant, John Bondanella

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

RAHINAH IBRAHIM, an individual,

Plaintiff,

v.

DEPARTMENT OF HOMELAND  
SECURITY, et al.,

Defendants.

) Case No. C 06-0545 WHA

)  
)  
) DECLARATION OF JOHN BONDANELLA  
) IN SUPPORT OF MOTION TO DISMISS

)  
) Date: June 29, 2006  
) Time: 8:00 a.m.  
) Judge: The Hon. William Alsup  
) Ctrm: 9, 19th Floor

1 I, John Bondanella, hereby declare as follows:  
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3 1. The matters stated herein are of my own personal knowledge and based upon a  
4 review of my own personal records. If called upon as a witness, I could and would testify  
5 competently to the matters stated herein.

6 2. I am a resident of the Commonwealth of Virginia. I have lived in the same house in  
7 Virginia since February 1992, except for a temporary relocation to the State of Pennsylvania  
8 between May 2000 through June 2003, during which time I kept my home in Virginia.

9 3. I am currently an employee of the Transportation Security Administration ("TSA")  
10 in Arlington, Virginia. I have been a TSA employee since May 2005.

11 4. From June 2004 through May 2005, I was an employee of US Investigations  
12 Services, Inc. ("USIS"), a Virginia corporation that provides certain services to the United States  
13 government under contract. On January 2, 2005, I was a watch officer in the Transportation  
14 Security Operations Center, Transportation Security Administration, Department of Homeland  
15 Security.

16 5. I was employed by the RAND Corporation ("RAND"), a nonprofit research institute,  
17 as a full-time staff member from April 1987 through June 2004. After my voluntary retirement in  
18 June 2004, I served under contract to RAND as an adjunct staff member from June 2004 through  
19 May 2005. None of my RAND employment pertained to the Department of Homeland Security, to  
20 TSA, or to USIS.

21 6. While employed by RAND, I was a resident of the State of California from  
22 approximately April 1987 through February 1992.

23 7. In February 1992 I relocated to the RAND office in the District of Columbia, and  
24 purchased the home where I currently reside in the Commonwealth of Virginia. Upon leaving the  
25 State of California, I permanently relinquished any interest I had in any property located in  
26 California, I closed any bank or other accounts I had opened in California, and I stopped paying  
27 California taxes. At no point since I left California have I ever intended to move back to that state.  
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1 My daughter remained in the State of California until June 1994 to complete her college studies at a  
2 private university.

3 8. I temporarily left Virginia from May 2000 through June 2003 and moved to the State  
4 of Pennsylvania, for purposes of my employment with RAND.

5 9. In June 2003 I moved back to the Commonwealth of Virginia, where I continue to  
6 reside today. In Virginia, I continued my employment with RAND until my voluntary retirement  
7 from the institute in 2004. I then served under contract to RAND as an adjunct staff member from  
8 June 2004 to May 2005.

9 10. Beginning in 1992, when I moved from California, and continuing until 2004, when  
10 I stopped working for RAND, I made occasional return trips to California as required by my  
11 employment with RAND. At no time did I usually ever make more than four trips to California per  
12 year during 1992 to 1999 and usually not more than two trips per year during 2000-2003. Each and  
13 every one of these trips was directly related to my employment with RAND, except for a trip in or  
14 around May/June 1994 to attend my daughter's graduation. My last trip to California as a RAND  
15 employee was in or around August 12-16 of 2003.

16 11. While employed by USIS from June 2004 through May 2005, I did not travel to  
17 California. During my employment with the TSA since May 2005, I have not traveled to  
18 California. My only contacts with the State of California since June 2004 have been to receive  
19 occasional telephone calls from law enforcement or airline personnel calling from that state (along  
20 with telephone calls from nearly every other state, from foreign countries, and from RAND).

21 12. I was not served with the complaint in this action while present in California; a copy  
22 of the complaint was sent to me at the TSA via certified mail. I do not consent to the jurisdiction of  
23 this Court, and appear in this action involuntarily in connection with this motion to dismiss.

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13. Defending this action in California would pose a significant burden on me in time, effort and expense.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed on May 22, 2006 in Fairfax, Virginia.

By:   
JOHN BONDANELLA