

FILED
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County of Santa Clara, California
By: [Signature]

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14 Attorneys for [Proposed] Intervenors, Steven Haug and Silicon Valley Taxpayers Association, a
15 California non-profit corporation.

17 SUPERIOR COURT OF THE STATE OF CALIFORNIA
18 COUNTY OF SANTA CLARA

19 THE PEOPLE OF THE STATE OF
20 CALIFORNIA on the RELATION of SAN
JOSE POLICE OFFICERS' ASSOCIATION,
21 *Plaintiff,*
22 v.
23 CITY OF SAN JOSE, and CITY COUNCIL OF
SAN JOSE,
24 *Defendants.*
25

CASE NO. 113-CV-245503
**DECLARATION OF STEVEN HAUG
IN SUPPORT OF APPLICATION TO
INTERVENE**
DATE: April 12, 2016
TIME: 9:00 A.M. **BY FAX**
DEPT: 7
JUDGE: McGowen

26 I, Steven Haug, declare as follows:
27 1. The following statements are based on my personal knowledge. If called upon to do so,
28 I would competently testify to them.

1 2. I have been a resident, taxpayer and registered voter of the City of San Jose since 1978.

2 3. I retired in 2002 after serving 4 years in United States Air Force and working for over
3 25 years in the software industry. Attached hereto as **Exhibit A** is a true and correct copy of my
4 resume, showing my professional experience. I have owned my home since 1983.

5 4. My retirement consists of Social Security retirement benefits and personal savings. I do
6 not receive any pension or health benefits from the City of San Jose.

7 5. I serve as the treasurer for the Silicon Valley Taxpayers Association ("SVTA"). I have
8 experience in finance and accounting from working on financial software projects and performing
9 accounting for my personal business. This experience assisted me in understanding financial benefits
10 of Measure B, "The Sustainable Retirement Benefits and Compensation Act", to the City of San Jose.

11 6. I supported Measure B. As a registered voter of San Jose, I voted for the passage of
12 Measure B on June 5, 2012. As a registered voter of San Jose, I benefited in a direct way from passage
13 of Measure B. Section 1504-A of Measure B empowered me and all San Jose voters to approve future
14 increases in retiree payments and health benefits:

15 The voters expressly reserve the right to consider any change in matters
16 related to pension and other post employment benefits. Neither the City
17 Council, nor any arbitrator appointed pursuant to Charter Section 1111,
18 shall have authority to agree to or provide any increase in pension and/or
19 retiree healthcare benefits without voter approval, except that the Council
20 shall have the authority to adopt Tier 2 pension benefit plans within the
21 limits set forth herein

22 7. Measure B was approved by a majority of San Jose voters. I believe without Measure
23 B, rising pension costs will be passed down to taxpayers, including me, or City services to its residents
24 will continue to be curtailed to support increasing pension costs. Also, if Measure B is invalidated, I
25 will be deprived of the express authority granted to me and other San Jose voters to approve increases
26 in pension and retiree healthcare benefits.

27 8. I also believe that without Measure B the residents of San Jose, such as myself, will face
28 higher city costs and reduced services as city funds are shifted from important city services to pay for

1 increased pension and related employee and retiree costs. Measure B will lessen the pressure on the
2 City's finances.

3 9. I believe the settlement framework modifying Measure B, as well as any judgment
4 nullifying Measure B, would personally harm me as a voter of San Jose by nullifying my constitutional
5 right to vote and join with other like-minded voters to enact Measure B pension reforms. As a resident
6 of San Jose, I have a direct and personal interest in ensuring the City directs its limited resources to
7 essential services and maintains its fiscal viability free from increased pension obligations.

8 10. I will also be personally impacted if Measure B is nullified or modified, because the
9 prospect of increased local taxes to support rising pension costs and essential municipal services, and
10 ensure the city's solvency would put a strain on my fixed income from the limited retirement benefits
11 I receive and could make it impossible for me to be able to afford my home. I voted for Measure B
12 so that San Jose residents and voters like myself are authorized to approve pension increases.

13 I declare under penalty of perjury under the laws of California that the foregoing is true and
14 correct. Executed this 2nd of March, 2016 at San Jose, California.

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16 
17 Steven Haug

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EXHIBIT A

STEVEN B. HAUG
1053 Belvedere Lane
San Jose, Ca. 95129-2957

(408) 255-9274
<http://www.sbhinc.biz>
Email: steven_haug@sbhinc.biz

QUALIFICATIONS:

Over twenty-five years experience designing and implementing software for a wide range of platforms. Contracting since 1992. Incorporated in 1994.

SOFTWARE/HARDWARE SKILLS:

- C, C++, COBOL, Pascal, SPL, TAL Programming Languages
- MPE/iX, Korn shell and TACL shell scripts
- HP3000 MPE VE & MPE/iX
- HP9000 UNIX Workstation and Multi-user Systems
- HPImage, ALLBASE, Oracle, KSAM, V/3000, XDB, HPSRC, QUIZ, Suprtool
- Custom build and upgrade Intel based PC's, provide IT support for small business

WORK EXPERIENCE:

INTUIT, Mountain View, CA

August 2000 - September 2000

- Analyze process used to build one of the companys products. Made recommendation for short and long term changes to correct process deficiencies as well as hardware changes. Upgraded the build process to provide additional capability, eliminate problems and reduce costs until a long term solution could be implemented. All work was done on PC platform running Windows.

HEWLETT-PACKARD/AGILENT, Santa Clara, CA

May 1998 – January 2002

- Upgrade the literature distribution system to work with LAN printers, for Y2K compliance and changes related to the company split. Order processing programs are COBOL and Quiz accessing Image databases on a MPE/iX system. The order entry part of the system consists of C programs accessing an Oracle database on HP-UX. Converted part of the system using an Informix database to use an Oracle database.

HEWLETT-PACKARD, Mountain View, CA

February 1998 – December 1998

- Test and enhance the order router process that is used to route orders to legacy systems and SAP. Programs are COBOL accessing Image databases. All code was converted for Y2K compliance and translated into C.

HEWLETT-PACKARD, Palo Alto, CA

May 1995 – October 1997

- Enhance the world wide employee database building new interfaces to other systems using ALLBASE, C and Batchnet. Convert world wide employee system to Oracle and HPUX platform. Enhance the US personnel warehouse and other personnel systems.

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OCS Technologies, Pleasanton, CA

January 1995 - June 1995

- Worked on computer aided dispatch software using C, COBOL, TCP/IP, HP Image and HPSRC. Developed a data loader to convert customer data into a format used by OCS software. Implemented version control procedures for all OCS product files.

HEWLETT-PACKARD, Palo Alto, CA

July 1993 - October 1994

- Created the world wide employee database, WEDB, using ALLBASE, C and Batchnet. As a team member, helped create a personnel warehouse for all US employees using ALLBASE and C. Rewrote HP's affirmative action personnel system using COBOL, HPImage, V/3000 and Jetform.

HEWLETT-PACKARD, Santa Clara, CA

February 1993 - May 1993

- Worked as team member to migrate a large DB2 database to ALLBASE. Developed C programs and MPE/iX shell scripts. Developed and ran various jobs for IBM mainframe.

HEWLETT-PACKARD, Palo Alto, CA

June 1992 - January 1993

- Enhanced HP's external reporting system ERP using ALLBASE, KSAM and C. Enhanced the world wide asset management system OASIS using COBOL, HPImage, V/3000 and HPBRW.

TANDEM COMPUTERS, Cupertino, CA

July 1990 - February 1992

Senior Software Designer

- Modified the QA Backup/Restore test library to improve error detection.
- Developed various QA tools using C, TACL shell scripts, Autotester and various UNIX tools.

HEWLETT-PACKARD

August 1977 - June 1990

Senior Software Engineer (1981 - 1990)

HEWLETT-PACKARD, Cupertino, CA

- Designed and developed tools to automate the build process for the MPE/iX operating system.
- Developed a configuration management system to load source files onto MPE/iX build systems. Processing time was reduced from eight hours to twenty minutes with human errors eliminated. This was a client server application running five active parallel processes on two systems.
- Maintained global structure definition files for MPE/iX OS.
- Developed a release management system for UNIX workstations and UNIX multi-user systems.

STEVEN B. HAUG

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- Developed a tape copy utility that can copy any tape format. This tool is widely used at many HP divisions because of its flexibility, ease of use, reliability and performance. This tool uses privileged no wait I/O for concurrent access of up to nine tape drives.
- Enhanced a source code statistics tool, adding the ability to parse assembly and C language syntax. Doubled performance by using low level I/O calls.
- Developed a problem tracking system used during the development phase of the MPE/iX operating system. The tool was written in COBOL & PASCAL using an HPImage database.

HEWLETT-PACKARD, Various divisions

- Designed and developed a state of the art cost accounting system for semiconductor manufactures to replace CA-10. The new system added many new features including National Language Support while improving performance 1700%. Developed a tool similar to Adager to erase HPImage dataset as part of a project to use HPImage as a relational database.
- Designed and developed data communications for a world wide financial reporting system FRS using X.25 networks.
- Provided technical training for junior software engineers.

Manufacturing Systems Manager (1977 - 1981)

- Promoted from programmer.
- Managed programming staff responsible for manufacturing and related systems.
- Designed and developed a cost accounting system for the Microwave Semiconductor Division.
- Enhanced manufacturing, order processing and document control systems.
- Provided technical support for division MIS department.
- Performed hardware requirement and disaster recovery planning for MIS department.

RIVERSIDE COUNTY DATA PROCESSING CENTER

1976 - 1977

Programmer Analyst

- Worked on the design of a new index generating system for the county Records Office.

UNITED STATES AIR FORCE

1969 - 1973

Programmer

- Designed, developed, maintained and scheduled military business systems.

EDUCATION:

Cal Poly Pomona BS Business Administration (cum laude) Major: Business Data Processing
1977

University of Nebraska at Omaha 1972 - 1973

Williamsport Area Community College, Pennsylvania 1968 - 1969