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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

Deanna Sykes, et al.,) Case No. 2:09-CV-01235-MCE-KJM
Plaintiffs,)
v.) **PLAINTIFF ADAM RICHARDS'S**
John McGinness, et al.,) **DECLARATION IN SUPPORT**
Defendants.) **OF SUMMARY JUDGMENT**
) **Fed. R. Civ. Proc. 56**

I, Adam Richards, am competent to state, and declare the following based on my personal knowledge:

1. I am a law abiding resident of Yolo County.
2. I am authorized and qualified under Federal and State law to purchase and possess firearms.
3. In March, 2009, I contacted Defendant Prieto's office to inquire about the process for obtaining a permit to carry a handgun. Defendant Prieto's office advised me that the desire to have a gun available for self-defense would not constitute "good cause" for the issuance of the permit, and that I should not apply because doing so would be a futile act.
4. I was further advised that as a matter of policy, my application would also not be considered unless I first applied to the Chief of Police in the City of Davis, where I reside.
5. I subsequently applied to Davis Police Chief Lanny Black for a permit to carry a handgun.

1 On April 1, 2009, Police Chief Black denied my application for a handgun carry permit,
2 stating that for budgetary reasons his department no longer processes handgun carry
3 permit applications, and suggested that I seek a permit from Sheriff Prieto.

4 6. I want to exercise my Second Amendment right to carry a handgun for personal
5 protection.

6 7. I want a handgun carry permit so that I can protect myself and my family. However, I
7 received no threats of violence and I am unaware of any specific threat to me or my
8 family.

9 8. I have read Defendant Prieto's written policy declaring that "self-protection and
10 protection of family (without credible threats of violence)" is among "examples of invalid
11 reasons to request a permit," – this is perfectly consistent with my experience in
12 unsuccessfully seeking a permit to carry a handgun.

13 9. I have an understanding that I lack "good cause" to obtain a permit as that term is defined
14 and implemented by Defendants Prieto and Yolo County.

15 10. I fear arrest, prosecution, fines and imprisonment were I to carry a handgun without a
16 permit. But for the lack of a handgun carry permit and fear of prosecution, I would carry
17 a handgun in public for self-defense.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed this 4th day of August, 2009

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A handwritten signature in blue ink, appearing to read "Adam Richards", is written over a horizontal line.

21 Adam Richards
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