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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

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11 Adam Richards, et al., ) Case No. 2:09-CV-01235-MCE-KJM  
12 Plaintiffs, )  
13 v. ) DECLARATION OF JULIANNE VERSNEL  
Ed Prieto, et al., ) IN SUPPORT OF MOTION FOR SUMMARY  
14 Defendants. ) JUDGMENT  
15 Fed. R. Civ. Proc. 56  
16

17 I, Julianne Versnel, am competent to state, and declare the following based on my  
18 personal knowledge:

19 1. I am the Director of Operations for the Second Amendment Foundation, Inc.  
20 (“SAF”).

21 2. SAF is a non-profit membership organization incorporated under the laws of  
22 Washington with its principal place of business in Bellevue, Washington. SAF has over 650,000  
23 members and supporters nationwide, including many in California. The purposes of SAF include  
24 promoting the exercise of the right to keep and bear arms; and education, research, publishing  
25 and legal action focusing on the Constitutional right to privately own and possess firearms, and  
26 the consequences of gun control.

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1           3.       SAF expends its resources encouraging exercise of the right to bear arms, and  
2 advising and educating their members, supporters, and the general public about the policies with  
3 respect to the public carrying of handguns in California, including in Yolo County. The issues  
4 raised by, and consequences of, Defendants' policies, are of great interest to SAF's constituency.  
5 Defendants' policies regularly cause the expenditure of resources by SAF as people turn to it for  
6 advice and information.

7           4.       Defendants' policies bar SAF's members and supporters from obtaining permits  
8 to carry handguns.

9           5.       SAF's members and supporters regularly carry functional handguns in public for  
10 self-defense where allowed. SAF's members and supporters in Yolo County would do so, but  
11 refrain from doing so because they fear arrest, prosecution, fine, and imprisonment for lack of a  
12 license to carry a handgun.

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

14           Executed this the 13 day of January, 2011.

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17 Julianne Versnel

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