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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 GENE HOFFMAN, JR.  
14 Ed Prieto, et al., ) IN SUPPORT OF MOTION FOR SUMMARY  
15 Defendants. ) JUDGMENT  
Fed. R. Civ. Proc. 56

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17 I, Gene Hoffman, Jr., am competent to state, and declare the following based on my  
18 personal knowledge:

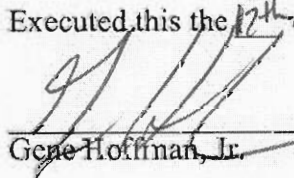
- 19  
20 1. I am the Chairman of the Calguns Foundation, Inc. ("CGF").  
21 2. The Calguns Foundation, Inc. is a non-profit organization incorporated under the  
22 laws of California with its principal place of business in Redwood City,  
23 California. The purposes of CGF include supporting the California firearms  
24 community by promoting education for all stakeholders about firearm laws, rights  
25 and privileges, and securing the civil rights of California gun owners, who are  
26 among its members and supporters.

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3. CGF expends its resources encouraging exercise of the right to bear arms, and advising and educating their members, supporters, and the general public about the policies with respect to the public carrying of handguns in California, including in Yolo County. The issues raised by, and consequences of, Defendants' policies, are of great interest to CGF's constituency. Defendants' policies regularly cause the expenditure of resources by CGF as people turn to it for advice and information.
4. Defendants' policies bar CGF's members and supporters from obtaining permits to carry handguns.
5. CGF's members and supporters regularly carry functional handguns in public for self-defense where allowed. CGF's members and supporters in Yolo County would do so, but refrain from doing so because they fear arrest, prosecution, fine, and imprisonment for lack of a license to carry a handgun.

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

Executed this the 12<sup>th</sup> day of January, 2011.

  
\_\_\_\_\_  
Gene Hoffman, Jr.