- 1	,		
1	DENNIS J. HERRERA, State Bar #139669	. ,	v
2	City Attorney WAYNE K. SNODGRASS, State Bar #148137	4	1
1	VINCE CHHABRIA, State Bar #208557	ė .	,
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7	Attorneys for Defendants		*
8	CITY AND COUNTY OF SAN FRANCISCO,	et al.	
9	CUREDION COURS OF T		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
- 1	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
10	COUNTY OF SAN FRANCISCO		
11	UNLIMITED JURISDICTION		
12		i i	
13	PAULA FISCAL, LARRY P.	Case No. 05-505960	·
	BARSETTI, REBECCA KIDDER, DANA DRENKOWSKI, JOHN	DECLARATION O	F DIANE
14	CANDIDO, ALAN BYARD, ANDREW SIRKIS, NATIONAL RIFLE	BRADFORD IN SUPPORT OF CITY'S OPPOSITION TO PETITION FOR	
15	ASSOCIATION, SECOND	WRIT OF MANDA	
16	AMENDMENT FOUNDATION, CALIFORNIA ASSOCIATION OF	Hearing Date:	February 15, 2006
17	FIREARMS RETAILERS, LAW	Hearing Judge:	James L. Warren
	ENFORCEMENT ALLIANCE OF AMERICA, and SAN FRANCISCO	Time: Place:	9:30 a.m. 301
18	VETERAN POLICE OFFICERS		
19	ASSOCIATION,	Date Action Filed: Trial Date:	Dec. 28, 2005 None Scheduled
20	Plaintiffs and Petitioners,	ı	
1	vs.		•
21	CITY AND COUNTY OF SAN	·	
22	FRANCISCO, SAN FRANCISCO	To the state of th	COPY
23	POLICE CHIEF HEATHER FONG in her official capacity and SAN		
24	FRANCISCO POLICE DEPARTMENT,		

Defendants and Respondents.

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## I, Diane Bradford, declare as follows:

- 1. I lost my oldest child to gun violence in San Francisco. I submit this declaration in support of Proposition H, and in support of the City's Opposition to the Petition for a Writ of Mandate.
- 2. On July 5, 2005 at about 8:15 a.m., I was getting ready to leave my house in Bayview and go to work when I looked out the window and saw police officers staring at my house. I opened the window and asked if I could help them, and they responded that they needed to talk to me.
- 3. When I went outside, they starting asking me questions about my daughter, Deanne Bradford, her estranged husband, Roger Johnson, and their two year-old son, James. They asked whether I had spoken with Roger that day, and if I knew where James' babysitter was. I did not know why they were asking these questions, and I did not know the answers.
- 4. A few minutes later I received a call on my cell phone from one of Deanne's friends. She told me that Deanne had been shot, and was lying on the ground outside of William Cobb School in San Francisco.
- 5. I asked the police officers if this was true. They said they did not know, but they had been instructed to escort me to the school. During the drive, I did not know what happened to my daughter.
- 6. When we arrived at the school, there were crowds of police cars and news reporters. Everything became a blur. At some point, a man approached me and told me that he was the coroner, and that my daughter had been killed by multiple gunshot wounds.
- 7. As I later learned, it was her husband, Roger Johnson, who killed Deanne. Earlier that year, they had become involved in a custody dispute over their son James. One week prior to my daughter's murder, the court awarded custody of James to Deanne. Deanne was raising James, and her five other children, on her own.
- 8. On the morning of her death, Deanne took James to the babysitter, and then dropped her other children off at William Cobb School.
- 9. Deanne walked the children into the school. When she came back out Roger, was there waiting for her with a legally-owned handgun. He shot Deanne multiple times, killing her.

- 10. Later that day, Roger used the same handgun to kill himself. I was told that Roger had no criminal record, but that he had a history of emotional problems and he had attempted suicide when he was a technique.
- 11. Deanne left behind six minor children: James, who is two years old; Roman, who is five; Anthony, who is seven; Ananda, who is nine; Antania, who is ten; and Denise, who is twelve.
- 12. I am now taking care of two of Deanne's children Anthony and Denise. My nephew is raising Ananda and Antania, and my other nephew is raising Roman. My youngest daughter is now raising James.
- 13. The death of my daughter has changed my life forever. Even though I did not see

  Deanne die, I have a repeated image in my mind of her being shot. Over and over again, I see

  Roger sneaking up behind her at the school and shooting her.
- 14. When I told the children that their mother had been killed, they were hysterical.

  They still talk about her every day. They remember all the nice things she did for them, and what a good mother she was.
- 15. The children also talk about Roger. They remember how badly he treated their mother. Sometimes they even say they wish they could kill Roger.
- 16. I take Denise and Anthony to grief counseling in Oakland every Thursday. Ananda and Antania have also been going to counseling regularly, but their sessions were just cancelled. I am trying to find them new counseling, hopefully in Oakland with Denise and Anthony.
- 17. I am a native Bayview resident and have lived here all my life. The gun violence in Bayview has gotten much worse here over the years, and lately it has been terrible. I cannot escape gun violence even when I go to church. Just in the past few weeks, two boys who lived across the street from my church were killed by guns. One of those boys was killed right outside of the church, and we all heard the gunshots during services

Executed January 19, 2006, in San Francisco, California.

DIANE HRADFORD