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7 Attorneys for Defendants
8 CITY AND COUNTY OF SAN FRANCISCO, et al.

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SAN FRANCISCO
11 UNLIMITED JURISDICTION

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13 PAULA FISCAL, LARRY P.
BARSETTI, REBECCA KIDDER,
14 DANA DRENKOWSKI, JOHN
CANDIDO, ALAN BYARD, ANDREW
15 SIRKIS, NATIONAL RIFLE
ASSOCIATION, SECOND
16 AMENDMENT FOUNDATION,
CALIFORNIA ASSOCIATION OF
17 FIREARMS RETAILERS, LAW
ENFORCEMENT ALLIANCE OF
18 AMERICA, and SAN FRANCISCO
VETERAN POLICE OFFICERS
ASSOCIATION,

19 Plaintiffs and Petitioners,

20 vs.

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22 CITY AND COUNTY OF SAN
FRANCISCO, SAN FRANCISCO
23 POLICE CHIEF HEATHER FONG in
her official capacity and SAN
24 FRANCISCO POLICE DEPARTMENT,
and Does 1-25,

25 Defendants and Respondents.
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Case No. 05-505960

**DECLARATION OF LIEUTENANT
JOHN HENNESSEY IN SUPPORT OF
CITY'S OPPOSITION TO PETITION
FOR WRIT OF MANDATE**

Hearing Date: February 15, 2006
Hearing Judge: James L. Warren
Time: 9:30 a.m.
Place: 301

Date Action Filed: Dec. 28, 2005
Trial Date: None Scheduled

1 I, Lieutenant John Hennessey, declare as follows:

2 1. I am presently employed as the Officer in Charge of the Homicide Detail for the San
3 Francisco Police Department ("SFPD"). I have held this position for three years, and have been
4 employed by the SFPD for a total of 32 years.

5 2. My office carefully tracks the homicides committed each year in San Francisco,
6 including the manner in which the victims were killed. The following table identifies the number
7 of homicide victims each year for the past five years, the number of those victims who were killed
8 by firearms, and the percentage of the victims who were killed by firearms.

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Year	Total Homicides	Firearm Homicides	Percentage of Homicides by Firearm
2001	64	39	61%
2002	68	40	59%
2003	70	49	70%
2004	88	63	72%
2005	96	80	83%

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20 3. As this table indicates, the number of homicides in San Francisco has increased each
21 year for the past five years.

22 4. The number of firearms homicides have increased dramatically as well, more than
23 doubling during the past five years.

24 5. The most recent homicide came on Saturday, January 21, 2006. A man was shot and
25 killed in the Bayview during a carjacking.

26 6. Firearms homicides have not only increased in real numbers; they have increased as
27 a percentage of the overall homicides as well. As the above table shows, over the past three years
28

1 – and particularly in 2005. – there has been a dramatic increase in the use of firearms during the
2 commission of a homicide.

3 7. Although the SFPD does not have a readily available breakdown of the number of
4 firearms homicides committed by handguns as opposed to long guns, I know from my experience
5 as the Officer in Charge of Homicide Detail that the vast majority of firearms homicides over the
6 past three years involved the use of a handgun.

7 Furthermore, I know from my experience that the vast majority of firearms incidents take
8 place in San Francisco's southern neighborhoods, specifically Bayview/Hunter's Point, the Mission
9 District, Visitacion Valley, Ingleside and Potrero Hill.

10 Executed January _____, 2006, in San Francisco, California.

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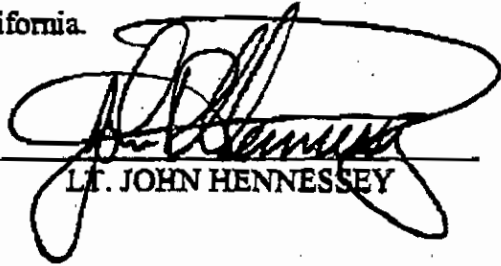
LT. JOHN HENNESSEY

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10 Executed January 25, 2006, in San Francisco, California.

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13 LT. JOHN HENNESSEY
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