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CITY AND COUNTY OF SAN FRANCISCO, et al.

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

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

19 Plaintiffs and Petitioners,

20 vs.

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

25 Defendants and Respondents.

Case No. 05-505960

**DECLARATION OF KATHY HOOD  
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, Kathy Hood, declare as follows:

2 1. Last year, my son, Roger Young Jr., became homicide victim number 57 in San  
3 Francisco for 2004, after being shot twice in the back of the head by a handgun. I submit this  
4 declaration in support of Proposition H, and in support of the City's Opposition to the Petition for a  
5 Writ of Mandate.

6 2. In the early morning of July 24<sup>th</sup>, 2004, I received a call from Roger's friend. The  
7 friend said that she had heard gunshots from a residence where Roger had just entered on Plymouth  
8 Avenue in Ingleside.

9 3. I immediately called the Taraval Police Station to tell them who I was and what I  
10 heard. They instructed me to go to San Francisco General Hospital to see my son.

11 4. I went with my husband to the hospital. The staff told us that they did not know  
12 where Roger was, and they told us to wait.

13 5. We waited for about five hours at the hospital, not knowing what had happened to  
14 Roger. During this time various family members arrived. We called all of Roger's friends to try  
15 and find out if they had seen him. We even called CityTow to ask about Roger's car. CityTow  
16 told us that they had Roger's car, but that it had been put on a "homicide hold."

17 6. As we were getting ready to leave the hospital we overheard two hospital staff  
18 members discussing a shooting incident. One of the staff members told the other one that there had  
19 been a shooting in a residence on Plymouth Avenue, that two people were in surgery, and that a  
20 third person was killed at the scene.

21 7. At this point we began to assume that Roger had been killed, but my family and I  
22 rushed to the Taraval Police Station to find out for sure. When I walked into the police station and  
23 identified myself, the officer in the reception area said, "M'aam, I'm really sorry but your son didn't  
24 make it."

25 8. I do not remember what happened after that, other than hearing my sister screaming  
26 in the background. The next thing I remember is that I was back in the car in the police station  
27 parking lot. Two homicide inspectors came to the car and explained to me what happened.  
28

1 9. I was told that Roger had gone to a friend's house on Plymouth Avenue. When he  
2 arrived, a burglary was taking place. The robbers had ransacked the upstairs and downstairs areas  
3 of the house. They had shot and killed Roger's friend, and shot a woman who was visiting there as  
4 well. The woman survived but is permanently disabled.

5 10. The police told me they believed the robbers were leaving the house when Roger  
6 came to the door. They shot Roger twice to the back of the head. The killers have not been found.

7 11. Before he died, Roger lived with his fiancé, Lois Brandon, and their daughter, Kelani  
8 Young. Roger and Lois were supposed to be married on July 25<sup>th</sup>, 2004 – the day after he was  
9 murdered.

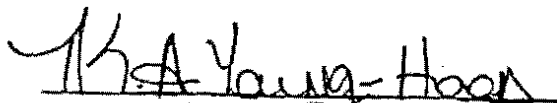
10 12. Kelani is three years old. Since Roger was killed, I have been helping Lois raise  
11 Kelani. Kelani is still asking for her father, more than a year after his death.

12 13. Roger was my only son, and I raised him on my own. His death has changed my  
13 entire life. I often feel paranoid and have difficulty being in crowds. Although I grew up in San  
14 Francisco, and although my family is still there, I now live in the East Bay and am afraid to return  
15 to the City.

16 14. Since my son's death, I have had terrible difficulties at work, and have been forced to  
17 change jobs several times. Now I work as a welfare eligibility worker in the City and County of  
18 San Francisco Human Services Agency. I help needy parents with children obtain benefits from  
19 the Aid for Families with Dependent Children program.

20 Sometimes, helping these families reminds me of my blessings because I am working with  
21 people who are less fortunate. Other times, it is difficult for me to work with families with  
22 children because it reminds me that I lost my son. But I plan to stick with my job and do the best I  
23 can. I am hoping God is using me and my experience to help families with children to better  
24 appreciate their blessings.

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

26  
27   
28 KATHY HOOD