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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

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

25 Plaintiffs and Petitioners,

26 vs.

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

Defendants and Respondents.

Case No. 05-505960

**DECLARATION OF LIEUTENANT  
COLLEEN FATO OH 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

A rectangular stamp with the word "COPY" in a bold, sans-serif font. To the left of the word is a small square icon containing a stylized letter 'C'.

1 I, Lieutenant Colleen Fatooh, declare as follows:

2 1. I am presently employed as the Director of Youth Service the San Francisco  
3 Police Department ("SFPD"). I have been coordinating Youth Service programs for the past  
4 six years, and have been employed by the SFPD for a total of 20 years.

5 2. Approximately three years ago, in response to the increase in gun violence at  
6 or near San Francisco's schools, the Police Department and the San Francisco Unified,  
7 School District ("SFUSD") adopted a "lockdown" policy to protect schoolchildren from  
8 firearms.

9 3. To implement this policy, the Police Department orders a school "locked  
10 down" whenever it determines that its students may be threatened by gun violence. We  
11 work with school employees to shut off all entrances and exits to the school and to ensure  
12 that nobody can leave or enter the building until the threat has been neutralized.

13 4. Since the beginning of this school year – which began in September 2005 –  
14 we have been forced to lock down at least 10 schools due to the threat of gun violence.

15 5. Most recently, just before Thanksgiving we were forced to lock down seven  
16 schools in the Visitation Valley area: Burbank Middle School, Hillcrest Elementary School,  
17 Visitation Valley Elementary School, Burton High School, the San Francisco Elementary  
18 School, Saint Elizabeth's Elementary School and E.R. Taylor Elementary School. We  
19 locked down these schools after receiving reports of an armed homicide suspect running  
20 through McClaren Park nearby.

21 6. During the previous week, we were forced to lock down Burnett Child  
22 Development Center in Bayview after a gunman was seen across the street. Because the  
23 Burnett Center hosts an after school program for children from numerous other schools, we  
24 were forced to divert approximately 25 buses full of children that were on their way to the  
25 Center before it was locked down. The parents of these children had to be contacted and  
26 informed that they needed to pick up their children.

27 7. More recently, we have had several gun-related incidents at or near the  
28 schools. For example, on Wednesday, January 18, 2006, officers exchanged fire with two

1 students on the campus of Luther Burbank Middle School. The school was not locked down  
 2 because the students were apprehended. On Friday, January 20, 2006, a student was shot  
 3 and injured in Potrero Hill. And about three weeks ago, a child was reported to have  
 4 brandished a handgun on the Burton High School campus. Although he was not  
 5 apprehended, officers caught *another* student with a handgun while investigating the initial  
 6 report.

7 8. In my experience, since we began locking down schools about three years  
 8 ago, almost all of the lockdowns have taken place in San Francisco's southern  
 9 neighborhoods, specifically Bayview/Hunter's Point, the Mission District, Visitacion Valley,  
 10 Ingleside and Potrero Hill.

11 Executed January 24, 2006, in San Francisco, California.

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 LT. COLLEEN FATOOH

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