

1 C. D. Michel - S.B.N. 144258
Glenn S. McRoberts - SBN 144852
2 Clinton B. Monfort - S.B.N. 255609
Anna M. Barvir - S.B.N. 268728
3 MICHEL & ASSOCIATES, LLP
180 E. Ocean Boulevard, Suite 200
4 Long Beach, CA 90802
Telephone: 562-216-4444
5 Facsimile: 562-216-4445
Email: cmichel@michellawyers.com

6 Attorneys for Plaintiffs
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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 ESPANOLA JACKSON, PAUL COLVIN,) CASE NO. C09-2143-RS
THOMAS BOYER, LARRY BARSETTI,)
12 DAVID GOLDEN, NOEMI MARGARET) **DECLARATION OF ESPANOLA JACKSON**
ROBINSON, NATIONAL RIFLE) **IN SUPPORT OF MOTION FOR**
13 ASSOCIATION OF AMERICA, INC., SAN) **PRELIMINARY INJUNCTION**
FRANCISCO VETERAN POLICE)
14 OFFICERS ASSOCIATION,)

15 Plaintiffs)
)

16 vs.)
)

17 CITY AND COUNTY OF SAN)
FRANCISCO, THE MAYOR OF SAN)
18 FRANCISCO, AND THE CHIEF OF THE)
SAN FRANCISCO POLICE)
19 DEPARTMENT, in their official capacities,)
and DOES 1-10,)

20 Defendants.)
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DECLARATION OF ESPANOLA JACKSON

1. I, Espanola Jackson, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a seventy-nine-year-old woman and a long-time resident of the City and County of San Francisco, where I currently live alone.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States and the state of California.

4. I currently own at least one lawfully acquired and possessed handgun that I keep in my home for self-defense purposes.

5. In accordance with San Francisco Police Code section 4512, my handgun is currently stored in a lockbox at all times when not carried on my person. I presently want to store my handgun unlocked and operable for immediate self-defense and, but for section 4512, I would not store my handgun in a locked container at all times. If this court declares section 4512 invalid or otherwise enjoins its enforcement, I would keep my handgun operable within my home, i.e., not disabled by a trigger lock or stored in a locked container.

6. In order to comply with San Francisco Police Code section 4512, I currently store my handgun in a lockbox located in my night stand. I am concerned about my ability to quickly and effectively retrieve my handgun in time to defend myself against a violent intruder. For example, if I heard an intruder break into my home in the middle of the night, I would have to turn on the light, find my glasses, find the key to the lockbox, insert the key in the lock and unlock the box (under the stress of the emergency), and then get my gun before being in position to defend myself. That is not an easy task at my age.

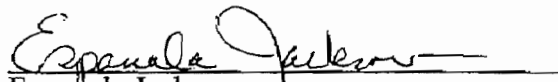
7. San Francisco Police Code section 4512 requires me to keep my handgun in a locked container or disabled by a trigger lock at all times when not carried on my person. It is impractical and dangerous to keep a loaded firearm attached to my body while I sleep. Storing my handgun in a locked container or disabled by a trigger lock at all times when not carried as required by the law greatly impedes my ability to access an operable firearm for immediate self-defense in my

1 home.

2 8. Because San Francisco Police Code section 4512 requires me to store my handgun in a
3 locked safe or disabled with a trigger lock at all times when not carried on my person, I am
4 currently, and will continue to be, irreparably harmed by the ongoing deprivation of my
5 individual, fundamental right to keep an unlocked and loaded firearm in my home for self-defense
6 purposes.

7 9. Because San Francisco Police Code section 4512 requires me to store my handgun in a
8 locked safe or disabled with a trigger lock at all times when not carried on my person, I am
9 currently, and will continue to be, irreparably harmed by the ongoing deprivation of my
10 individual, fundamental right to have an operable firearm available for immediate self-defense in
11 my home.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed within the
13 United States on August __, 2012.

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15 Espanola Jackson

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1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 ESPANOLA JACKSON, PAUL COLVIN,) CASE NO.: CV-09-2143-RS
5 THOMAS BOYER, LARRY BARSETTI,)
6 DAVID GOLDEN, NOEMI MARGARET)
7 ROBINSON, NATIONAL RIFLE) CERTIFICATE OF SERVICE
8 ASSOCIATION OF AMERICA, INC., SAN)
9 FRANCISCO VETERAN POLICE)
10 OFFICERS ASSOCIATION,)
11 Plaintiffs)
12 vs.)
13 CITY AND COUNTY OF SAN)
14 FRANCISCO, THE MAYOR OF SAN)
FRANCISCO, AND THE CHIEF OF THE)
SAN FRANCISCO POLICE)
DEPARTMENT, in their official capacities,)
and DOES 1-10,)
Defendants.)

15 IT IS HEREBY CERTIFIED THAT:

16 I, the undersigned, am a citizen of the United States and am at least eighteen years of age.
17 My business address is 180 E. Ocean Blvd., Suite 200, Long Beach, California, 90802.

18 I am not a party to the above-entitled action. I have caused service of:

19 **DECLARATION OF ESPANOLA JACKSON IN SUPPORT OF**
20 **MOTION FOR PRELIMINARY INJUNCTION**

21 on the following party by electronically filing the foregoing with the Clerk of the District Court
22 using its ECF System, which electronically notifies them.

23 Wayne Snodgrass, Deputy City Attorney
24 Christine Van Aken, Deputy City Attorney
25 Office of the City Attorney
26 1 Drive Carlton B. Goodlett Place
27 City Hall, Room 234
28 San Francisco, CA 94102

29 I declare under penalty of perjury that the foregoing is true and correct. Executed on August
30, 2012.

31 /s/ C. D. Michel
32 C. D. Michel
33 Attorney for Plaintiffs