

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 PAUL COLVIN IN**
ROBINSON, NATIONAL RIFLE) **SUPPORT OF MOTION FOR PARTIAL**
13 ASSOCIATION OF AMERICA, INC. ,SAN) **JUDGMENT ON THE PLEADINGS**
FRANCISCO VETERAN POLICE)
14 OFFICERS ASSOCIATION,)

15 Plaintiffs)

16 vs.)

17 CITY AND COUNTY OF SAN)
FRANCISCO, THE MAYOR OF)
18 SAN 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 PAUL COLVIN

1. I, Paul Colvin, 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 reside in the City and County of San Francisco.

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 handguns are currently stored in a combination-locked safe 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. But for San Francisco Police Code section 613.10(g), I presently intend to purchase expanding and fragmenting ammunition in the City and County of San Francisco that is currently prohibited from sale and purchase under section 613.10(g) for the purpose of self-defense in my home. If this court declares section 613.10(g) invalid or otherwise enjoins its enforcement, I would purchase such ammunition within the City and County of San Francisco for self-defense in my home.

7. But for San Francisco Police Code section 613.10(g), I presently intend to purchase ammunition in the City and County of San Francisco for the purpose of self-defense in my home regardless of whether such ammunition serves a “sporting purpose” to City’s satisfaction. If this court declares section 613.10(g) invalid or otherwise enjoins its enforcement, I would purchase such ammunition within the City and County of San Francisco for self-defense in my home.

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I declare under penalty of perjury that the foregoing is true and correct. Executed within the United States on May 3, 2012.


Sheldon Paul Colvin

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 PAUL COLVIN IN SUPPORT OF MOTION FOR PARTIAL
20 JUDGMENT ON THE PLEADINGS**

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 May
30 17, 2012.

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