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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JANICE ALTMAN, *et al.*,
Plaintiffs,

vs.

COUNTY OF SANTA CLARA,
CALIFORNIA, *et al.*,

Defendants.

Case No. 4:20-cv-02180-JST

**DECLARATION OF ALAN GOTTLIEB
IN SUPPORT OF PLAINTIFFS’
APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND
ISSUANCE OF PRELIMINARY
INJUNCTION**

DECLARATION OF ALAN GOTTLIEB

I, Alan Gottlieb, declare as follows:

1. I am the Executive Vice President of the Second Amendment Foundation, Inc. (“SAF”).

- 1 2. SAF is a non-profit corporation organized under the laws of the State of
2 Washington with its principal place of business in Bellevue, Washington.
- 3 3. SAF has over 650,000 members and supporters nationwide, including in the
4 Counties of Santa Clara, Contra Costa, Alameda, and San Mateo, California.
- 5 4. The purposes of SAF include promoting the exercise of the right to keep and
6 bear arms and legal action focusing on the constitutional right to privately own
7 and possess firearms.
- 8 5. SAF also promotes research and education on the consequences of abridging
9 the right to keep and bear arms and on the historical grounding and importance
10 of the right to keep and bear arms as one of the core civil rights of United
11 States citizens.
- 12 6. As detailed in the Plaintiffs' First Amended Complaint, Plaintiffs, Plaintiffs'
13 members and customers, and other similarly situated individuals would
14 exercise the fundamental human right to acquire, keep, bear, and practice
15 proficiency training and shooting with arms – including firearms, ammunition,
16 magazines, and appurtenances – for lawful purposes including self-defense,
17 and would do so, but for fear of liability and prosecution under Defendants'
18 laws, orders, policies, practices, customs, and enforcement actions.
- 19 7. SAF has and continues to expend and divert resources, and has been and
20 continues to be adversely and directly harmed, because of Defendants' laws,
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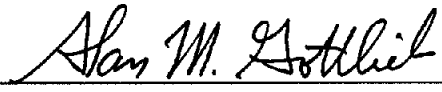
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policies, orders, practices, customs, and enforcement actions.

8. Accordingly, and for reasons set for in Plaintiffs' application and motion, I respectfully ask this Court to grant the application and/or motion for preliminary injunction.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 9, 2020.


Alan Gottlieb