

1 George M. Lee (SBN 172982)
2 gml@seilerepstein.com
3 **SEILER EPSTEIN LLP**
4 275 Battery Street, Suite 1600
5 San Francisco, California 94111
6 Phone: (415) 979-0500
7 Fax: (415) 979-0511

8 Adam Kraut, Esq.
9 akraut@fpclaw.org
10 **FIREARMS POLICY COALITION**
11 1215 K Street, 17th Floor
12 Sacramento, CA 95814
13 (916) 476-2342
14 *Admitted Pro Hac Vice*

15 Attorneys for Plaintiffs

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

18 JANICE ALTMAN, *et al.*,
19 Plaintiffs,

20 vs.

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

23 Defendants.

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

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

24 **DECLARATION OF GENE HOFFMAN**

25 I, Gene Hoffman, declare as follows:

- 26 1. I am the Chairman of Plaintiff California Gun Rights Foundation (“CGF”)
27 and reside in the County of San Mateo, California.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2. CGF is a non-profit organization incorporated under the laws of California, with a place of business in Sacramento, California.
3. CGF’s purposes are to protect, defend, and advance rights and liberties, including, without limitation, Californians’ individual right to keep and bear arms; those codified and uncodified rights protected under the Constitution of the United States and the Constitution of the State of California; and all other charitable and educational activities as permissible under law.
4. CGF serves its members and the public through research, education, legal action, outreach, and other programs.
5. CGF has members and supporters, who have all the indicia of membership, in the State of California, including in the counties of San Mateo, Alameda, Santa Clara, and Contra Costa.
6. CGF represents its members and supporters—who include gun owners, individuals who wish to acquire firearms and ammunition, licensed California firearm retailers, shooting ranges, trainers and educators, and others—and brings this action on behalf of itself, its members, supporters who possess all the indicia of membership, and similarly situated members of the public.
7. As detailed in the Plaintiffs’ First Amended Complaint, Plaintiffs, Plaintiffs’ members and customers, and other similarly situated individuals would exercise the fundamental human right to acquire, keep, bear, and practice

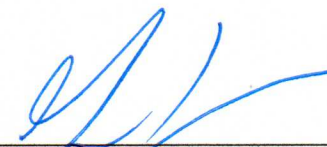
1 proficiency training and shooting with arms – including firearms, ammunition,
2 magazines, and appurtenances – for lawful purposes including self-defense,
3 and would do so, but for fear of liability and prosecution under Defendants’
4 laws, orders, policies, practices, customs, and enforcement actions.
5

6 8. CGF has and continues to expend and divert resources, and has been and
7 continues to be adversely and directly harmed, because of Defendants’ laws,
8 policies, orders, practices, customs, and enforcement actions.
9

10 9. Accordingly, and for reasons set for in Plaintiffs’ application and motion, I
11 respectfully ask this Court to grant the application and/or motion for
12 preliminary injunction.
13

14
15 I declare under penalty of perjury that the foregoing is true and correct.

16 Executed on April 9, 2020.

17
18
19
20 
Gene Hoffman