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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 JANICE ALTMAN
IN SUPPORT OF PLAINTIFFS' EX
PARTE APPLICATION FOR
TEMPORARY RESTRAINING ORDER,
OR IN THE ALTERNATIVE,
ISSUANCE OF PRELIMINARY
INJUNCTION**

DECLARATION OF JANICE ALTMAN

I, Janice Altman, declare as follows:

1. I am an adult resident of the City of San Jose, County of Santa Clara,

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California, and am a named plaintiff in the above matter. I have personal knowledge of the facts stated herein, and if called as a witness, I could competently testify to these facts.

2. This declaration is executed in support of Plaintiffs’ Application for Temporary Restraining Order and Issuance of Preliminary Injunction.
3. In light of the developing situation involving the spread of COVID-19, I became concerned about inmate releases, crime, and other current and possible dangers caused by the coronavirus pandemic.
4. I am not prohibited from possessing firearms or ammunition under federal and state law.
5. I desire to exercise my fundamental right to keep and bear arms for self-defense and purchase a firearm and ammunition for self-defense and other purposes. I also desire to exercise my fundamental right to practice proficiency shooting with firearms and ammunition.
6. But for the Defendants’ Orders and actions and reasonable fear of prosecution under those Orders and enforcement actions, I would acquire firearms and ammunition, and practice proficiency and safety with those arms and ammunition at a shooting range, for lawful and constitutionally protected purposes including self-defense.
7. Unlike other constitutionally protected products that can be purchased online

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and shipped directly to me, under federal and state law, I cannot purchase a firearm online and have it shipped to my home.

8. Unlike individuals in other states, under State law, I cannot lawfully purchase ammunition online and have it shipped directly to my home.
9. In order for me to comply with federal and State law, I can only acquire and take possession of firearms in a face to face transaction at a duly licensed firearm retailer.
10. In order for me to comply with California law, I can only acquire and take possession of ammunition in a face to face transaction at a duly licensed firearms retailer or ammunition vendor.
11. Firearm and ammunition product manufacturers, retailers, importers, distributors, and shooting ranges are “Essential Businesses” to me because, in order for me to comply with California law, I can only purchase firearms and ammunition personally, in face to face transactions, at a licensed firearm and/or ammunition vendor.
12. Defendants’ Orders and actions have resulted in firearm and ammunition retailers and shooting ranges being closed in where I reside, in the City of San Jose and the County of Santa Clara, and in other neighboring and nearby cities and counties, including the County of Alameda, the County of San Mateo, and the County of Contra Costa, among other jurisdictions.

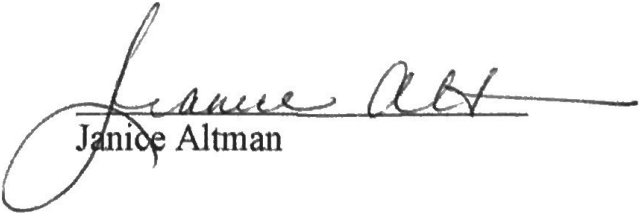
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13. I possess a valid firearms safety certificate (“FSC”) as required by the State of California in order to purchase or acquire a firearm.

14. I want to exercise my right to acquire, keep, bear, and practice proficiency training and shooting with arms – including firearms, ammunition, magazines, and appurtenances – for lawful purposes including self-defense, and would do so, but for the reasonable and imminent fear of arrest and criminal prosecution under Defendants’ laws, policies, orders, practices, customs, and enforcement.

15. 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.


Janice Altman