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21 Attorneys for Plaintiffs

22 **UNITED STATES DISTRICT COURT**

23 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

24 ADAM BRANDY, et al.,
25
26 Plaintiffs,

27 vs.

28 ALEX VILLANUEVA, in his official
capacity as Sheriff of Los Angeles
County, California, and in his capacity as

Case No. 2:20-cv-02874

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

1 the Director of Emergency Operations, et
2 al.,

3 Defendants.

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6 **DECLARATION OF GENE HOFFMAN**

7 I, Gene Hoffman, declare as follows:

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1. I am the Chairman of Plaintiff California Gun Rights Foundation (“CGF”).
 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, the County of Los Angeles, the City of Los Angeles, the City of Burbank, and other jurisdictions, including those for which Defendant County of Los Angeles and Defendant Sheriff Villanueva

- 1 and his Los Angeles County Sheriff’s Department provides law enforcement
2 services.
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4 6. CGF’s members include Plaintiffs Adam Brandy, Jonah Martinez, Daemion
5 Garro, Jason Montes, Alan Kushner, Tom Watt, Gun World, Match Grade
6 Gunsmiths, The Target Range, and A Place To Shoot, Inc.
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8 7. CGF represents its members and supporters—who include gun owners,
9 individuals who wish to acquire firearms and ammunition, licensed California
10 firearm retailers, shooting ranges, trainers and educators, and others—and
11 brings this action on behalf of itself, its members, supporters who possess all
12 the indicia of membership, and similarly situated members of the public.
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14 8. As detailed in the Plaintiffs’ First Amended Complaint, Plaintiffs, Plaintiffs’
15 members and customers, and other similarly situated individuals would
16 exercise the fundamental human right to acquire, keep, bear, and practice
17 proficiency training and shooting with arms – including firearms, ammunition,
18 magazines, and appurtenances – for lawful purposes including self-defense,
19 and would do so, but for fear of liability and prosecution under Defendants’
20 laws, orders, policies, practices, customs, and enforcement actions.
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24 9. CGF has and continues to expend and divert resources, and has been and
25 continues to be adversely and directly harmed, because of Defendants’ laws,
26 policies, orders, practices, customs, and enforcement actions.
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1 10. Accordingly, and for reasons set for in Plaintiffs' application, I respectfully
2 ask this Court to: (A) Declare that the operation of firearm and ammunition
3 product manufacturers, retailers, importers, distributors, and shooting ranges
4 are "essential" so that firearm and ammunition product manufacturers,
5 retailers, importers, distributors, and shooting ranges may continue to operate;
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7 (B) Grant Plaintiffs' application and issue a temporary restraining order and a
8 preliminary injunction enjoining State and Local Defendants from enforcing
9 their Orders and enforcement policies, practices, and customs that individually
10 and/or collectively violate the Second, Fifth, and Fourteenth Amendments, to
11 restore the status quo ante and so that firearm and ammunition product
12 manufacturers, retailers, importers, distributors, and shooting ranges may
13 continue to operate; and, (C) Grant all other and further relief, including
14 injunctive relief, against Defendants as necessary to effectuate the Court's
15 judgment, or as the Court otherwise deems just and equitable.

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17 I declare under penalty of perjury that the foregoing is true and correct.
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20 Executed on March 30, 2020.
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Gene Hoffman