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14 Attorneys for Plaintiffs

15 **UNITED STATES DISTRICT COURT**
16 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

17 DONALD MCDOUGALL, an
18 individual; JULIANA GARCIA, an
19 individual; SECOND AMENDMENT
20 FOUNDATION; CALIFORNIA GUN
21 RIGHTS FOUNDATION; and
22 FIREARMS POLICY COALITION,
INC.,

23 Plaintiffs,

24 vs.

25 COUNTY OF VENTURA,
26 CALIFORNIA; BILL AYUB, in his
27 official capacity; WILLIAM T. FOLEY,
28 in his official capacity; ROBERT
LEVIN, in his official capacity; and

Case No. 2:20-cv-02927

**DECLARATION OF GENE
HOFFMAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

1 VENTURA COUNTY PUBLIC
2 HEALTH CARE AGENCY,

3
4 Defendants.

5
6 **DECLARATION OF GENE HOFFMAN**
7

8 I, Gene Hoffman, declare as follows:

- 9 1. I am the Chairman of Plaintiff California Gun Rights Foundation (“CGF”)
10 and reside in the County of San Mateo, California.
11
- 12 2. CGF is a non-profit organization incorporated under the laws of California,
13 with a place of business in Sacramento, California.
14
- 15 3. CGF’s purposes are to protect, defend, and advance rights and liberties,
16 including, without limitation, Californians’ individual right to keep and bear
17 arms; those codified and uncodified rights protected under the Constitution
18 of the United States and the Constitution of the State of California; and all
19 other charitable and educational activities as permissible under law.
20
- 21 4. CGF serves its members and the public through research, education, legal
22 action, outreach, and other programs.
23
- 24 5. CGF has members and supporters, who have all the indicia of membership,
25 in the State of California, including in the county of Ventura.
26
- 27 6. CGF represents its members and supporters—who include gun owners,
28

1 individuals who wish to acquire firearms and ammunition, licensed California
2 firearm retailers, shooting ranges, trainers and educators, and others—and
3 brings this action on behalf of itself, its members, supporters who possess all
4 the indicia of membership, and similarly situated members of the public.
5

6 7. As detailed in the Plaintiffs’ First Amended Complaint, Plaintiffs, Plaintiffs’
7 members, and other similarly situated individuals would exercise the
8 fundamental human right to acquire, keep, bear, and practice proficiency
9 training and shooting with arms – including firearms, ammunition, magazines,
10 and appurtenances – for lawful purposes including self-defense, and would do
11 so, but for fear of liability and prosecution under Defendants’ laws, orders,
12 policies, practices, customs, and enforcement actions.
13

14 8. CGF has and continues to expend and divert resources, and has been and
15 continues to be adversely and directly harmed, because of Defendants’ laws,
16 policies, orders, practices, customs, and enforcement actions.
17

18 9. Accordingly, and for reasons set for in Plaintiffs’ application and motion, I
19 respectfully ask this Court to grant the motion for preliminary injunction.
20

21 I declare under penalty of perjury that the foregoing is true and correct.
22

23 Executed on April 14, 2020.
24

25
26 
27 Gene Hoffman
28