

1 Alan Gura (Calif. Bar No. 178221)
2 Gura & Possessky, PLLC
3 101 N. Columbus St., Suite 405
4 Alexandria, VA 22314
5 703.835.9085/Fax 703.997.7665

6 Donald E.J. Kilmer, Jr. (Calif. Bar No. 179986)
7 Law Offices of Donald Kilmer, A.P.C.
8 1645 Willow Street, Suite 150
9 San Jose, CA 95125
10 408.264.8489/Fax 408.264.8487

11 Jason A. Davis (Calif. Bar No. 224250)
12 Davis & Associates
13 27281 Las Ramblas, Suite 200
14 Mission Viejo, CA 92691
15 949.310.0817/Fax 949.288.6894

16 IN THE UNITED STATES DISTRICT COURT
17 FOR THE EASTERN DISTRICT OF CALIFORNIA

18	Ivan Peña, et al.,)	Case No. 2:09-CV-01185-FCD-KJM
19)	
20	Plaintiffs,)	DECLARATION OF GENE HOFFMAN,
21)	JR. IN SUPPORT OF MOTION FOR
22)	SUMMARY JUDGMENT
23	v.)	[Fed. R. Civ. P. 56]
24)	
25	Wilfredo Cid,)	Date: Oct. 2, 2009
26)	Time: 10:00 a.m.
27	Defendants.)	Dept: 2, 15 th Floor
28)	Judge: Frank C. Damrell, Jr.
			Trial Date: None
			Action Filed: April 30, 2009

DECLARATION OF GENE HOFFMAN, JR.

1
2 I, Gene Hoffman, Jr., am competent to state, and to declare the following based on my
3 personal knowledge:

4 1. I am the Chairman of the Calguns Foundation, Inc. ("CGF").

5 2. CFG is a non-profit organization incorporated under the laws of California with its
6 principal place of business in Redwood City, California.

7 3. The purposes of CGF include supporting the California firearms community by
8 promoting education for all stakeholders about California and federal firearm laws, rights and
9 privileges, and securing, defending and protecting the civil rights of California gun owners,
10 who are its members and supporters.

11 4. CGF expends their resources encouraging exercise of the right to bear arms, and
12 advising and educating their members, supporters, and the general public about the legality of
13 particular firearms. The issues raised by, and consequences of, Defendant's policies, are of
14 great interest to CGF constituencies.

15 5. Defendant's policies regularly cause the expenditure of resources by CGF as people
16 turn to our organization for advice and information.

17 6. Defendant's policies bar the board members and supporters of CGF from obtaining
18 numerous, if not most, handguns.

19 7. Exhibit A is a true and correct copy of documents provided to me by the State of
20 California in response to a request for official records pursuant to the California Public
21 Records Act, Cal. Government Code §6250, et seq.

22 8. Exhibit B is a true and correct copy of: Jon Vernick, e al., "*I Didn't Know the Gun*
23 *Was Loaded': An Explanation of Two Safety Devices That Can Reduce the Risk of*
24 *Unintentional Firearm Injuries.*" 20 Journal of Public Health Policy No. 4. (1999).

25 9. Exhibit C is a true and correct copy of the certified Legislative History of "Unsafe
26 Handgun Bill" Author Bill File.

27 10. Exhibit D is a true and correct copy of the certified Legislative History of "Unsafe
28 Handgun Bill" Senate Floor Analysis.

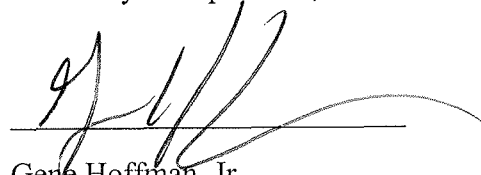
1 11. Exhibit H is a true and correct copy of documents provided to me by the State of
2 California in response to a request for official records pursuant to the California Public
3 Records Act, Cal. Government Code §6250, et seq.

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

5 Executed this the 1st day of September, 2009.

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7

A handwritten signature in black ink, appearing to read "Gene Hoffman, Jr.", is written over a horizontal line. The signature is stylized and cursive.

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Gene Hoffman, Jr.
Chairman
Calguns Foundation, Inc.

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