IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:26-cv-04837-NRN

GENE HOFFMAN; and
FIREARMS POLICY COALITION, INC.,

Plaintiffs,

v.

CITY AND COUNTY OF DENVER, COLORADO;
ARMANDO SALDATE III, in his official capacity as Director of the Colorado Bureau of Investigation;
COLONEL MATTHEW C. PACKARD, in his official capacity as Chief of the Colorado State Patrol;
JOHN WALSH, in his official capacity as District Attorney for the City and County of Denver, Colorado;
RON THOMAS, in his official capacity as Chief of Police for the Denver Police Department; and
ELIAS DIGGINS, in his official capacity as Sheriff of Denver,

Defendants.

DECLARATION OF GENE HOFFMAN

I, Gene Hoffman, am competent to state and declare the following based on my personal knowledge:

1. I am a law-abiding citizen of the United States and a resident of California.

2. I am over 21 years of age and am eligible, under federal and state law, to possess, acquire, purchase, and receive firearms, including handguns.

3. I am a member of Firearms Policy Coalition, Inc.

4. I am the lawful owner of a handgun and hold valid concealed-carry permits from the states of California, Utah, Arizona, and Florida.

5. I regularly carry a handgun on my person for self-defense while in public, including when I travel out of state, as permitted by federal, state, and local law.

6. My son is enrolled at Colorado State University in Fort Collins, Colorado. I travel to Colorado to visit him at least two or three times per year and will continue to do so for the foreseeable future. During these trips, I stay with friends who live in Denver, and I spend time in public areas and establishments within Denver city and county limits.

7. I last visited Denver in May 2026. My next trip to Denver is scheduled for January 2027.

8. As a nonresident whose home state lacks reciprocity with Colorado, I cannot obtain a concealed-carry permit from Colorado, nor does Colorado recognize my non-California permits as valid. Denver also prohibits open carry within city and county limits.

9. I am also unable to possess a handgun in the parking area while visiting the campus of Colorado State University, where my son is enrolled, or in the parking area of certain government buildings. By carrying a handgun while traveling in Colorado, I also risk violating the Gun Free School Zones Act because I cannot obtain a concealed-carry permit from Colorado.

10. Because of Colorado's and Denver's restrictions, I do not and cannot publicly carry a handgun in Denver. I also do not and cannot carry a handgun in the parking areas of Colorado State University and certain government buildings, or within 1,000 feet of any school zone. But for the restrictions, I would exercise my constitutional right to publicly carry a handgun in Denver and throughout Colorado for self-defense,

either open or concealed as permitted by law, during my trips to the city and state, including during my next trip in January 2027.

11. I am able and willing to complete all the steps necessary under Colorado law to obtain a concealed-carry permit. Other than my status as a nonresident, I could satisfy all the criteria for obtaining such a permit. I have not applied for a Colorado-issued permit because I am plainly ineligible as a nonresident.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my information, knowledge and belief.

Dated: October 2, 2026

Gene Hoffman