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5	Attorneys for Movant for Intervention	
6	IN THE DISTRICT COURT FOR THE NORTHERN MARIANA ISLANDS	
7	DAVID J. RADICH and LI-RONG RADICH,	No. 1:14-CV-00020
8	Plaintiffs,) DECLARATION
9	vs.	OF A. KODEP OGUMORO-ULUDONG
10	ROBERT GUERRERO,	
11	in his official capacity as Commissioner	
12	of the CNMI Department of Public Safety, and LARISSA LARSON,)
13	in her official capacity as Secretary of the CNMI Department of Finance,)
14	Defendants.)))
15	TANAPAG MIDDLE SCHOOL PARENT	
16	TEACHER STUDENT ASSOCIATION,	
17	Movant for Intervention.	
18)
19	I, A. Kodep Ogumoro-Uludong, declare as follows:	
20	1. I am President of the Tanapag Middle School Parent Teacher Student Association	
21	(PTSA).	
22	2. Tanapag Middle School is a public middle school for sixth through eighth grade	
23	students, located in Tanapag, Saipan, CNMI. It was established in 2014 as part of an overall	
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reorganization of the public elementary and middle school system on Saipan. This is its second school year in existence. Tanapag Middle School primarily serves students residing in the northern villages of Saipan: Tanapag, San Roque, As Matuis and Capitol Hill. It has approximately 200 students.

- 3. The PTSA is a non-profit corporation established under CNMI law. Its membership is composed of the parents, teachers and students of Tanapag Middle School.
- 4. The PTSA opposes the legalization of handguns in the CNMI, because handguns add a new and dangerous threat to the welfare of our students. A handgun in the home or school creates new opportunities for murder, assault and suicide, as well as attempts and threats to commit them, not to mention accidental death and injury from gunshot. A handgun can be easily carried, brandished and used even by children too young to fully appreciate its danger. Unlike a long gun, it is easily concealed and carried from place to place, including into the school. Furthermore, it has a cool and tough image with a natural appeal to adolescents.
- 5. We recognize that there are steps we can take to try to protect our students from the various dangers posed by handguns. For example, we could install metal detectors at the school gate, hire security guards, train teachers in tactics for calming down or disarming shooters, conduct "active shooter" drills for students, teach classes in gun safety, conduct random searches of student backpacks, even arm teachers with guns of their own. We do not want to do these things. We do not want metal detectors or security guards in our school. We do not want the authoritarian climate of anxiety and insecurity that such things tend to create. We do not want a "security state" in our school. Furthermore, we recognize that even totally effective security at school would not protect our students at home or out in the community.

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1	6. We do not want to be put in the position where we need to be concerned about	
2	developing such protective policies, or need to rely on them. There are already more than	
3	enough threats that we need to be concerned about protecting our students from, such as drugs	
4	domestic violence in the home, and sexual abuse. The threat of gun violence is a problem we	
5	have never had before, and we do not want it now. We recognize that handguns pose a serious	
6	problem for schools in the United States. We have been able to rely on our geographic isolation	
7	and our strict gun laws to protect us from this plague until now. We wish to continue to do so.	
8	7. We therefore seek to intervene in this matter, for the purpose of appealing the district	
9	court's decision.	
10	I declare upon penalty of perjury under the laws of the United States and the	
11	Commonwealth of the Northern Mariana Islands that the foregoing is true and correct.	
12	Executed at Saipan, CNMI, this 27 th day of April, 2016.	
13		
14	/s/A. Kodep Ogumoro-Uludong	
15	A. KODEP OGUMORO-ULUDONG	
16	1000-09-160427-PL-M intervene-DEC (kodep)	
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