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**Attorneys for Movant for Intervention**

**IN THE DISTRICT COURT**  
**FOR THE NORTHERN MARIANA ISLANDS**

<b>DAVID J. RADICH and LI-RONG RADICH,</b>	)	<b>No. 1:14-CV-00020</b>
	)	
<b>Plaintiffs,</b>	)	<b>DECLARATION</b>
	)	<b>OF A. KODEP</b>
<b>vs.</b>	)	<b>OGUMORO-ULUDONG</b>
	)	
<b>ROBERT GUERRERO,</b>	)	
<b>in his official capacity as Commissioner</b>	)	
<b>of the CNMI Department of Public Safety, and</b>	)	
<b>LARISSA LARSON,</b>	)	
<b>in her official capacity as Secretary</b>	)	
<b>of the CNMI Department of Finance,</b>	)	
	)	
<b>Defendants.</b>	)	
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<b>TANAPAG MIDDLE SCHOOL PARENT</b>	)	
<b>TEACHER STUDENT ASSOCIATION,</b>	)	
	)	
<b>Movant for Intervention.</b>	)	
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I, A. Kodep Ogumoro-Uludong, declare as follows:

1. I am President of the Tanapag Middle School Parent Teacher Student Association (PTSA).

2. Tanapag Middle School is a public middle school for sixth through eighth grade students, located in Tanapag, Saipan, CNMI. It was established in 2014 as part of an overall

1 reorganization of the public elementary and middle school system on Saipan. This is its second  
2 school year in existence. Tanapag Middle School primarily serves students residing in the  
3 northern villages of Saipan: Tanapag, San Roque, As Matuis and Capitol Hill. It has  
4 approximately 200 students.

5 3. The PTSA is a non-profit corporation established under CNMI law. Its membership is  
6 composed of the parents, teachers and students of Tanapag Middle School.

7 4. The PTSA opposes the legalization of handguns in the CNMI, because handguns add  
8 a new and dangerous threat to the welfare of our students. A handgun in the home or school  
9 creates new opportunities for murder, assault and suicide, as well as attempts and threats to  
10 commit them, not to mention accidental death and injury from gunshot. A handgun can be easily  
11 carried, brandished and used even by children too young to fully appreciate its danger. Unlike a  
12 long gun, it is easily concealed and carried from place to place, including into the school.  
13 Furthermore, it has a cool and tough image with a natural appeal to adolescents.

14 5. We recognize that there are steps we can take to try to protect our students from the  
15 various dangers posed by handguns. For example, we could install metal detectors at the school  
16 gate, hire security guards, train teachers in tactics for calming down or disarming shooters,  
17 conduct “active shooter” drills for students, teach classes in gun safety, conduct random searches  
18 of student backpacks, even arm teachers with guns of their own. We do not want to do these  
19 things. We do not want metal detectors or security guards in our school. We do not want the  
20 authoritarian climate of anxiety and insecurity that such things tend to create. We do not want a  
21 “security state” in our school. Furthermore, we recognize that even totally effective security at  
22 school would not protect our students at home or out in the community.

