

SWORN DECLARATION OF CLINTON E. GALLOWAY

I, Clinton E. Galloway, declare the under penalty of perjury, that:

- 1) I make this declaration of my own personal knowledge and if called as a witness I could and would testify to the facts stated herein.
- 2) I am a 55 year old African American residing in the City of Los Angeles.
- 3) I have known Gene Forte for 37 years and was the best man for him at his wedding to his wife of Chinese heritage, Eileen.
- 4) My father and mother, along with all of my family members have always considered Gene to be part of our family in every sense of the word.
- 5) Gene's children always refer to me as Uncle Clinton, and in fact, I consider them my nieces and nephews.
- 6) Gene always introduces me in public to others as one of his very best and oldest friends.
- 7) I traveled to Los Banos and stayed with Gene and his family on May 4th through May 6th, 2007.
- 8) At the time I went to Los Banos, I was not aware that the May Day Fair was taking place nor did I have any expectation of meeting Mayor Jones.
- 9) On the morning of May 5th, 2007, I accompanied Gene due to his being requested to participate in the May Day Fair Parade.
- 10) On May 5th, 2007, Gene pointed out to me Mayor Tommy Jones who was having a conversation with a female occupant of the car parked in front of us which Gene told me was going to carry Merced County Supervisor Jerry O'Banion.
- 11) Gene left the car we were sitting in and proceeded to talk with Mayor Jones.
- 12) Gene returned to the car and said that Mayor Jones would talk to him in a few minutes.
- 13) After several minutes of waiting, Gene then approached Mayor Jones and the two of them engaged in a conversation out of my hearing distance.
- 14) Gene then called me over to he and Mayor Jones and introduced me to Mayor Jones.
- 15) Until Gene introduced me to Mayor Jones, I had never met or spoken with Mayor Jones.
- 16) Gene asked Mayor Jones to repeat to me what Mayor Jones had just told him.
- 17) Mayor Jones then told me that he knew for a fact that Gene was a member of the KKK and that he was dangerous.
- 18) I then told Mayor Jones that I had known Gene for over thirty years and that I was absolutely positive that Gene was not a member of the Ku Klux Klan.
- 19) Gene and I then returned to his car.
- 20) A few minutes later, a gentleman walked by that Gene engaged in conversation and introduced me to as being Supervisor Jerry O'Banion.
- 21) Gene told Supervisor O'Banion in my presence that Mayor Jones said that he knew for a fact that Gene was a dangerous member of the KKK.
- 22) Supervisor O'Banion laughed and said, "You're kidding?" I then told Supervisor O'Banion that Mayor Jones also told me directly that he knew for a fact that Gene was a dangerous member of the KKK.

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- 23) A few minutes after that Gene engaged another individual in a conversation that was walking by and introduced him to me as being Fire Chief Chet Guintini.
- 24) Gene then told Fire Chief Guintini that Mayor Jones told Gene that he knew for a fact that Gene was a dangerous member of the KKK.
- 25) Chief Guintini, laughed and said the same thing as Supervisor Jerry O'Banion, "You're kidding me, right?"
- 26) I then told Chief Guintini that Mayor Jones told me directly that he knew for a fact that Gene was a dangerous member of the KKK.
- 27) From knowing Gene for over thirty years, I could see that he was greatly distressed over what Mayor Tommy Jones had said.
- 28) Gene had shared with me the information about Mayor Jones saying that he had been framed by Los Banos Police Department officers by their planting crack cocaine in his car.
- 29) I told Gene jokingly that from Mayor Jones' irrational statements in telling myself, a fellow African American who considers Gene one of his best friends and brother, that he knows for a fact Gene is a dangerous member of the KKK, it appears that Mayor Jones may still be smoking crack.
- 30) Gene shared with me his concerns about not knowing how many people Mayor Jones has been telling that Gene is a dangerous member of the KKK.
- 31) Gene told me that he was worried that if radical racists were to believe that the statements of Mayor Jones saying that Gene was a dangerous member of the KKK were true, that his wife and children could be in danger.
- 32) I also believe that Gene and his family could be in danger of harm from radical racists if they were to believe that Gene was a dangerous member of the KKK.

I declare such under the penalty of perjury under the laws of the State of California on this day of May 8th, 2007 in the County of Los Angeles.



Clinton E. Galloway