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*Attorneys for Plaintiffs*

11 UNITED STATES DISTRICT COURT  
12 FOR THE EASTERN DISTRICT OF CALIFORNIA  
13

14 WILLIAM WIESE, et al.,  
15 Plaintiffs,  
16 vs.  
17 ROB BONTA, in his official capacity as  
18 Attorney General of California, et al.,  
19 Defendants.  
20

Case No. 2:17-cv-00903-WBS-KJN

**DECLARATION OF TODD NIELSEN IN  
SUPPORT OF PLAINTIFFS' MOTION AND  
MOTION FOR SUMMARY JUDGMENT**

**[FRCP 56]**

Date: None Set  
Judge: Hon. William B. Shubb

21 DECLARATION OF TODD NIELSEN  
22

23 I, Todd Nielsen, declare as follows:

24 1. I am an adult resident of Mapleton, Utah, and a named plaintiff in this matter. I  
25 have personal knowledge of the facts stated in this declaration, and if called as a witness, could  
26 competently testify thereto. This declaration is executed in support of Plaintiffs' Motion for  
27 Summary Judgment.  
28

SEILER EPSTEIN LLP  
Attorneys at Law

1           2.       I am not prohibited from possessing or acquiring firearms under State or federal  
2 law.

3           3.       I am a member of organizational plaintiffs California Gun Rights Foundation  
4 (formerly named “The Calguns Foundation”), Firearms Policy Coalition, FPC Action Foundation  
5 (formerly named “Firearms Policy Foundation”), and Second Amendment Foundation.

6           4.       Prior to the year 2000, and while in California, I lawfully acquired standard  
7 firearm magazines capable of holding over ten rounds (cartridges) of ammunition that the State  
8 bans as “large-capacity” magazines.

9           5.       As an honorably retired police officer who served over 20 years with the San Jose  
10 Police Department, I regularly used such magazines while on the force.

11           6.       Since retiring, I have continued to participate in and conduct training for other  
12 law-abiding citizens and law enforcement officers in the lawful use of such magazines, through  
13 my business Nielsen Training and Consulting.

14           7.       I regularly travel back to California from Utah at least four times a year, and I  
15 conduct firearms training classes each time I travel there. These classes are for both civilian and  
16 law enforcement officers or officers in training.

17           8.       But for California’s ban on “large-capacity” magazines, I would bring with me,  
18 possess, and use such magazines while in California both for my own lawful personal self-  
19 defense and for the instruction of my students in the lawful use of such magazines. I would also  
20 acquire more such magazines to use for these purposes while in California.

21           9.       Unless and until the enforcement of the State’s “large-capacity” magazine ban  
22 laws is declared unconstitutional and enjoined, these laws will continue to adversely affect my  
23 right to keep and bear arms for self-defense and other lawful purposes in California.

24           I declare under penalty of perjury that the foregoing is true and correct. Executed on  
25 Mar 30, 2023

26 \_\_\_\_\_

27   
Todd Nielsen (Mar 30, 2023 19:15 MDT)

28 Todd Nielsen