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9 ALVIN DOE and PAUL A. GLADDEN

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SUPERIOR COURT OF CALIFORNIA

COUNTY OF SACRAMENTO

ALVIN DOE and PAUL A. GLADDEN,

Plaintiffs,

v.

KAMALA D. HARRIS, in her official capacity
as Attorney General of California; and
STEPHEN J. LINDLEY, in his official capacity
as Chief of the California Department of Justice
Bureau of Firearms,

Defendants.

Case No.: 34-2014-00163821

**DECLARATION OF PAUL A. GLADDEN
IN SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

1 I, Paul A. Gladden, declare:

2 1. I am a Plaintiff in this matter. I have personal knowledge of the matters set forth in
3 this declaration, and would be able to testify competently to these facts if called as a witness.

4 2. I hold a federal firearms license as a collector of curios and relics, issued pursuant
5 to Chapter 44 (commencing with Section 921) of Title 18 of the United States Code. I also have a
6 current certificate of eligibility issued by the California Department of Justice ("DOJ"). True and
7 correct copies of my current federal firearms license and certificate of eligibility are attached to
8 this declaration as Exhibits 1 and 2. I also have a license to carry a concealed weapon issued by
9 the sheriff in San Joaquin County.

10 3. More than once in the past, I have applied to purchase multiple non-curio or relic
11 handguns within a thirty-day period based on the statutory exemption in Penal Code section
12 27535(b)(9), and those applications were approved.

13 4. I am aware of the DOJ's new enforcement policy that interprets the licensed
14 collectors' exemption in Penal Code section 27535(b)(9) to apply only to applications to purchase
15 curios or relics.

16 5. But for the fear of prosecution or other adverse action by the DOJ or law
17 enforcement agencies, I would submit additional applications to purchase non-curio or relic
18 handguns that would violate the DOJ's enforcement policy.

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct. Executed June 4, 2014 in California.

21
22 
23 PAUL A. GLADDEN

EXHIBIT 1



DEPARTMENT OF JUSTICE
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
LICENSE (18 U.S.C. CHAPTER 44)

Under the provisions of 18 U.S.C., 921-929, and 27 CFR Part 478, you are licensed to collect curios and relics, within the limitations set forth in the law and regulations, until the expiration date shown. See "WARNINGS" and "NOTICES" on reverse.

THE PRIVILEGES GRANTED BY THIS LICENSE APPLY ONLY TO FIREARMS CLASSIFIED AS CURIOS AND RELICS.

DIRECT ATF
CORRESPONDENCE
TO

Chief, Federal Firearms Licensing Center (FFLC)
Bureau of Alcohol, Tobacco, Firearms and Explosives
244 Needy Road
Martinsburg, West Virginia 25405-9431

Telephone: 1-866-662-2750 Fax: 1-866-257-2749
E-mail: NLC@atf.gov ATF website: <http://www.atf.gov>

LICENSE
NUMBER

9-68-077-03-4K-02867

EXPIRATION
DATE

October 1, 2014

NAME

GLADDEN, PAUL A

Premises Address CHANGES? You must notify the FFLC at least 30 days before the move.
Redacted

TYPE OF LICENSE

COLLECTOR OF CURIOS AND RELICS

CHIEF, FEDERAL FIREARMS LICENSING CENTER (FFLC)

Patricia Power

PURCHASING CERTIFICATION

I certify that this is a true copy of a license issued to me to collect curios and relics.

Mailing Address CHANGES? Mail is NOT forwarded. Notify the FFLC of any changes.

GLADDEN, PAUL A
Redacted

(Original Signature of Licensee)

THIS LICENSE DOES NOT AUTHORIZE THE HOLDER TO ENGAGE
IN THE BUSINESS OF DEALING IN ANY FIREARMS

ATF F 8A (5310.17) (7-97)



DEPARTMENT OF JUSTICE
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
MARTINSBURG, WEST VIRGINIA

Dear Licensee:

Enclosed you will find your Federal Firearms License. This license entitles you as a collector of firearms, classified as curios and relics, to acquire curios and relics in interstate commerce. The license DOES NOT authorize you to be engaged in the business of dealing in curios and relics or any other type of firearm. No privileges are granted by this license for firearms NOT classified as curios or relics.

If this is your first license, publications and an initial supply of forms which relate to the conduct of business as a federal licensee will be mailed from the ATF Distribution Center, P.O. Box 5950, Springfield, Virginia, 22150-5950. Upon receipt of the packet, please use ATF F 1600.8 to order additional forms. Please allow ten days for delivery of your packet. After reviewing the information, if you have questions or problems concerning recordkeeping requirements or other information, contact your local ATF Area Office or you may call the Licensing Center in Martinsburg, West Virginia at (866) 662-2750.

Note you have received only one original license. DO NOT SIGN THE ORIGINAL LICENSE prior to making copies, as the signature on each certified copy must be an original.

A Federal Firearms License does not permit you to receive, sell, or transfer firearms or ammunition without first obtaining the proper State and/or local license, if any. Please check with your local authorities.

ATF Federal Firearms Licensing Center

EXHIBIT 2

KAMALA D. HARRIS
Attorney General

State of California
DEPARTMENT OF JUSTICE



DIVISION OF LAW ENFORCEMENT
BUREAU OF FIREARMS
P.O. BOX 160367
SACRAMENTO, CA 95816-0367
Telephone: (916) 227-2153
Fax: (916) 227-1021

February 13, 2014

PAUL A GLADDEN

Redacted

Certificate of Eligibility Number: 16433

CERTIFICATE OF ELIGIBILITY (COE)
CONFIRMATION NOTICE

The California Department of Justice, Bureau of Firearms has received and processed your COE application. Your new certificate is enclosed. Please note the expiration date on your certificate.

California Penal Code sections 26700, 26705, 27200 and 29050 require that all firearms dealers, firearms manufacturers, certain manufacturer employees, and gun show producers possess a valid COE.

If you have any questions, please contact the Firearms Licensing and Permits Section at the number listed above.

Sincerely,

A handwritten signature in dark ink, appearing to read "Stacy Heinsen".

STACY HEINSEN, Manager

Firearms Licensing and Permits Section
Bureau of Firearms

For **KAMALA D. HARRIS**
Attorney General

State of California
Department of Justice

CERTIFICATE OF ELIGIBILITY

Number: 16433

Issued to:

PAUL A GLADDEN

This is to certify that the Department of Justice, Bureau of Firearms has completed a firearms eligibility check on the above named individual. As of the date of issue, there is nothing that would prohibit the individual from acquiring or possessing a firearm.

Date of Issue: **March 28, 2014**

Expiration Date: **March 27, 2015**

Signature of Issuing Officer: _____

Shen