

C.D. Michel – SBN 144258  
Sean A. Brady – SBN 262007  
Anna M. Barvir – SBN 268728  
Matthew D. Cubeiro – SBN 291519  
MICHEL & ASSOCIATES, P.C.  
180 E. Ocean Boulevard, Suite 200  
Long Beach, CA 90802  
Telephone: (562) 216-4444  
Facsimile: (562) 216-4445  
Email: cmichel@michellawyers.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

VIRGINIA DUNCAN, RICHARD  
LEWIS, PATRICK LOVETTE, DAVID  
MARGUGLIO, CHRISTOPHER  
WADDELL, CALIFORNIA RIFLE &  
PISTOL ASSOCIATION,  
INCORPORATED, a California  
corporation,

Plaintiffs,

v.

XAVIER BECERRA, in his official  
capacity as Attorney General of the State  
of California; and DOES 1-10,

Defendants.

Case No: 17-cv-1017-BEN-JLB

**DECLARATION OF MICHAEL  
BARRANCO IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

Date: June 13, 2017  
Time: 10:00 a.m.  
Dept: 5A  
Judge: Hon. Roger T. Benitez

**DECLARATION OF MICHAEL BARRANCO**

1  
2 1. I, Michael Barranco, am a Director and the Treasurer of the California Rifle &  
3 Pistol Association, Incorporated (CRPA), a plaintiff in the above-entitled action. I make  
4 this declaration of my own personal knowledge and, if called as a witness, I could and  
5 would testify competently to the truth of the matters set forth herein.

6 2. CRPA is a non-profit membership organization classified under section  
7 501(c)(4) of the Internal Revenue Code and incorporated under the laws of California,  
8 with headquarters in Fullerton, California.

9 3. Founded in 1875, CRPA seeks to defend the Second Amendment and advance  
10 laws that protect the rights of individual citizens. CRPA works to preserve the  
11 constitutional and statutory rights of gun ownership, including the right to self-defense,  
12 the right to hunt, and the right to keep and bear arms. CRPA is also dedicated to  
13 promoting the shooting sports, providing education, training, and organized competition  
14 for adult and junior shooters. CRPA's members include law enforcement officers,  
15 prosecutors, professionals, firearm experts, and members of the public.

16 4. I know of CRPA members who currently own lawfully obtained magazines  
17 over ten rounds that they choose to own and use for lawful purposes, including self-  
18 defense.

19 5. I know of CRPA members who currently own lawfully obtained magazines  
20 over ten rounds who intend to comply with the law and dispossess themselves of those  
21 magazines by July 1, 2017, under threat of criminal enforcement under California Penal  
22 Code section 32310(c)-(d).

23 6. I know of CRPA members who currently own lawfully obtained magazines  
24 over ten rounds who, but for the imminent enforcement of California Penal Code section  
25 32310(c)-(d), would continuously retain possession of their lawfully obtained magazines  
26 over ten rounds within the state of California for lawful purposes. If this court declares  
27 California Penal Code section 32310 to be invalid or otherwise enjoins its enforcement, I  
28 believe that those members would immediately continue to possess a magazine or

1 magazines over ten rounds.

2 7. I know of CRPA members who, because of California Penal Code section  
3 32310, will be irreparably harmed by the unconstitutional physical taking of their  
4 lawfully acquired and possessed property without government compensation.

5 8. I know of CRPA members who, because of California Penal Code section  
6 32310, will have their lawfully owned magazines stripped of their use and will be  
7 irreparably harmed by the unconstitutional regulatory taking of their lawfully acquired  
8 and possessed property without government compensation.

9 I declare under penalty of perjury that the foregoing is true and correct. Executed  
10 within the United States on MAY 25, 2017.

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12   
13 Michael Barranco  
14 Declarant  
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Defendant.

Case No: 17-cv-1017-BEN-JLB

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, declare under penalty of perjury that I am a citizen of the United States over 18 years of age. My business address is 180 E. Ocean Boulevard, Suite 200 Long Beach, CA 90802. I am not a party to the above-entitled action.

I have cause service of the following documents, described as:

**DECLARATION OF MICHAEL BARRANCO IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY INJUNCTION**

on all parties by placing a copy in a separate envelope, with postage fully prepaid, for each address named below and depositing each in the U.S. Mail at Long Beach, CA, on May 26, 2017.

Ms. Alexandra Robert Gordon  
Mr. Anthony P. O'Brien  
California Department of Justice  
1300 I Street, Suite 125  
Sacramento, CA 95814

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 26, 2017, at Long Beach, CA.

  
Laura Palmerin