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10 Attorneys for Plaintiffs

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

13 KIM RHODE, et al.,

14 Plaintiffs,

15 v.

16 XAVIER BECERRA, in his official  
17 capacity as Attorney General of the State  
18 of California,

19 Defendant.

Case No.: 3:18-cv-00802-BEN-JLB

**DECLARATION OF GEORGE DODD**

Hearing Date: August 19, 2019  
Hearing Time: 10:30 a.m.  
Courtroom: 5A  
Judge: Hon. Roger T. Benitez

**DECLARATION OF GEORGE DODD**

2           1.     I, George Dodd, make this declaration of my own personal knowledge and,  
3 if called as a witness, I could and would testify competently to the truth of the matters set  
4 forth herein.

5           2.     I am a 69-year old honorably retired Navy Veteran. I retired from the U.S.  
6 Navy with the rank of 3rd Class Petty Officer, having served as an underwater demolition  
7 specialist and receiving the Bronze Star and Purple Heart during the Vietnam War.

8           3.     I currently reside in Moreno Valley, California, where I have lived for over  
9 40 years. I was born in Missouri and adopted at a young age.

10          4.     I am employed at Turner's Outdoorsman, Inc., a California licensed firearms  
11 dealer and work at its Corona store, where I have worked since 2010. As a condition of  
12 my employment with a California licensed firearms dealer, I am required to maintain a  
13 valid Certificate of Eligibility issued by the California Department of Justice ("DOJ").  
14 Possession of a valid Certificate of Eligibility serves to demonstrate that I am not  
15 prohibited from owning or possessing firearms or ammunition.

16          5.     As part of my duties in connection with my employment, I am required to  
17 initiate firearm and ammunition sales using DOJ's Dealer Record of Sale ("DROS")  
18 Entry System ("DES"). I am also authorized and required to assist customers in handling  
19 both firearms and ammunition and to administer the Firearm Safety Certificate ("FSC")  
20 program as a DOJ Certified Instructor.

21          6.     I lawfully own several firearms. At least one of my firearms should be  
22 recorded in DOJ's Automated Firearm System ("AFS"), having been purchased after  
23 January 1, 2014, from a California licensed firearms dealer. My personal information,  
24 including my residential address, has not changed since this firearm was purchased.

25          7.     I possess a valid California Driver's License with the notation "FEDERAL  
26 LIMITS APPLY" printed on the front of my license. I do not have a U.S. Passport nor a  
27 certified copy of my birth certificate.  
28

1           8.     Because I possess an ID with the notation "FEDERAL LIMITS APPLY,"  
2 DOJ regulations prohibit me from purchasing a firearm or ammunition without providing  
3 additional documentation establishing my lawful presence in the United States. DOJ  
4 regulations list several types of documents that satisfy this requirement. Of those  
5 documents that I would be able to obtain, these include a U.S. Passport or a certified copy  
6 of my U.S. birth certificate.

7           9.     I do not know my biological father's full name because I was adopted at a  
8 young age and am therefore unable to easily obtain a copy of my birth certificate.

9           10.    Because I do not possess a certified copy of my birth certificate, I am also  
10 generally unable to obtain a U.S. Passport. The requirements for the issuance of a U.S.  
11 Passport include providing proof of my citizenship, which normally requires a certified  
12 copy of a birth certificate.

13          11.    Because I do not possess a U.S. Passport or a certified copy of my birth  
14 certificate, I am also generally unable to obtain a REAL ID issued by the California  
15 Department of Motor Vehicles. The requirements for the issuance of a REAL ID include  
16 providing an original or certified copy of an "Identity Document," which includes  
17 documents such as a U.S. Passport or birth certificate.

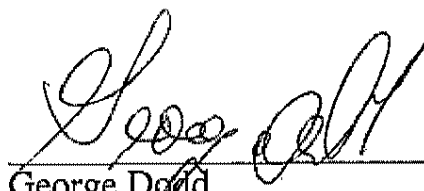
18          12.    DOJ's regulations requiring firearm and ammunition purchasers using ID's  
19 with the notation "FEDERAL LIMITS APPLY" to provide supplemental proof of lawful  
20 U.S. presence will also require me to provide additional documentation when renewing  
21 my Certificate of Eligibility. Without the necessary supplemental documentation, I will  
22 be prohibited from renewing my Certificate of Eligibility and will be unable not only to  
23 acquire firearms and ammunition, but to continue my employment with Turner's  
24 Outdoorsman, Inc.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed  
2 within the United States on JULY 10, 2019.

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5   
6 George Dodd  
7 Declarant  
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**CERTIFICATE OF SERVICE**  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

Case Name: *Rhode, et al. v. Becerra*  
Case No.: 3:18-cv-00802-JM-JMA

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 East Ocean Boulevard, Suite 200 Long Beach, CA 90802. I am not a party to the above-entitled action.

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

**DECLARATION OF GEORGE DODD**

on the following parties by electronically filing the foregoing on July 22, 2019, with the Clerk of the District Court using its ECF System, which electronically notifies them.

Nelson R. Richards  
Deputy Attorney General  
nelson.richards@doj.ca.gov  
2550 Mariposa Mall, Room 5090  
Fresno, CA 93721

*Attorneys for Defendant Attorney General  
Xavier Becerra*

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 22, 2019, at Long Beach, CA.

*s/ Laura Palmerin*  
Laura Palmerin