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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
12
13

14 **Kim Rhode et al.,**

15 Plaintiffs,
16

17 **v.**

18 **Xavier Becerra, in his official capacity**
19 **as Attorney General of the State of**
California, et al.,

20 Defendants.
21
22

3:18-cv-00802-BEN-JLB

**DECLARATION OF MAYRA G.
MORALES IN SUPPORT OF
DEFENDANT XAVIER
BECERRA'S OPPOSITION TO
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Date: August 19, 2019
Time: 10:30 a.m.
Dept: 5A
Judge: Hon. Roger T. Benitez
23 Action Filed: 4/27/2018
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1 **DECLARATION OF MAYRA G. MORALES**

2 I, MAYRA G. MORALES, declare:

3 1. I am a Staff Services Manager III for the California Department of
4 Justice, Bureau of Firearms. I make this declaration of my own personal
5 knowledge and experience and, if called as a witness, I could and would testify
6 competently to the truth of the matters set forth herein.

7 **BACKGROUND**

8 2. I possess a Bachelor of Science Degree in Speech Pathology. I have been
9 with the Department of Justice (Department) for over 18 years, of which 11 years
10 have been with the Bureau of Firearms. Over that time, I have held various
11 positions. In 2014, I became a Staff Services Manager within the Administration
12 and Special Projects Section where I oversaw all administrative functions of the
13 Bureau of Firearms including legislation, regulations, budgets, facilities, personnel,
14 telecommunication, procurement, and contracts. In April of 2016, I was promoted
15 to a Department of Justice Administrator II within the Regulatory Program Section
16 of the Bureau of Firearms. In this capacity I planned, organized, directed and
17 provided leadership to several programs.

18 3. I have served as a Staff Services Manager III over the Special
19 Assignment Section since April 2018.

20 4. My primary role in this capacity has been to oversee the Reporting and
21 Quality Assurance Section and provide oversight of the implementation of the
22 Ammunition Purchase Authorization Program. Under the direction of the Assistant
23 Bureau Director, I was responsible for the implementation of the Ammunition
24 Purchase Authorization Program that was established by Proposition 63, "Safety for
25 All Act," as amended by Senate Bill 1235. In this capacity, I was a subject-matter
26 generalist for all regulatory sections of the Bureau of Firearms.

**I. THE CALIFORNIA DEPARTMENT OF JUSTICE’S REGULATIONS
GOVERNING AMMUNITION PURCHASES AND TRANSFERS**

5. Proposition 63 was passed by California voters on November 8, 2016.

6. In January 2018, the Bureau of Firearms adopted Ammunition Vendor Licensing regulations, which are codified in title 11 of the California Code of Regulations at sections 4260-4264. These regulations establish the process for an ammunition vendor to obtain a license to sell ammunition and set the fee an ammunition vendor is authorized to charge the purchaser for processing an ammunition sale between two private, non-vendor parties.

7. As of July 31, 2019, there were 2,040 vendors licensed to sell ammunition in California. Of that number, 1,760 were licensed to sell firearms and ammunition and 280 were licensed to sell ammunition only.

8. In December 2018, the Department issued an Initial Statement of Reasons outlining proposed regulations governing the purchase and transfer of ammunition. A copy of that notice is attached to this declaration as Exhibit 1.

9. The Bureau of Firearms held a public comment period beginning on December 14, 2018, and closing on January 31, 2019. (Often referenced as the 45-day comment period—per the Administrative Procedure Act, the requirement is a minimum of 45 days.) During this comment period, the Bureau of Firearms received 219 different comments from 566 members of the public. The comments and the Summary and Response to Comments are part of the rulemaking file, which is publically available.

10. The Bureau of Firearms also held two public hearings for these regulations during the comment period. The first was held on January 29, 2019, in Los Angeles, and the second was held on January 31, 2019, in Sacramento. I was the hearing officer at both hearings. Transcripts of both are included in the final rulemaking file, which is publicly available.

11. The Bureau of Firearms held an additional public comment period beginning on April 18, 2019, and closing on May 8, 2019. (Often referenced as a 15-day comment period—per the Administrative Procedure Act, the requirement for notice of modifications is a minimum of 15 days.) The documents provided for this additional comment period were a Notice of Modification, an Updated Notice of Modification (correcting an incorrect e-mail address and extending the comment period), modifications to the Text of Proposed Regulations, an Initial Statement of Reasons Addendum, and a revised Economic and Fiscal Impact Statement (Std. 399). During this comment period, the Bureau of Firearms received 32 different comments from 139 members of the public. The comments and the Summary and Response to Comments, are all part of the rulemaking file, which is publically available.

12. In May 2019, the Department submitted a Final Statement of Reasons to the Office of Administrative Law. A copy of that final statement of reasons is attached to this declaration as Exhibit 2.

13. The regulations were approved by the California Office of Administrative Law on June 24, 2019 and went into effect on July 1, 2019.

14. The regulations outline the process for three eligibility checks: (1) the Standard Ammunition Eligibility Check; (2) the Certificate of Eligibility Verification Check; and (3) the Basic Ammunition Eligibility Check. (The regulations also contemplate a fourth Firearms Eligibility Check that permits a person to purchase a firearm and ammunition at the same time.)

15. The Standard Ammunition Eligibility Check and the Certificate of Eligibility Verification Check rely on the Department's Dealer Record of Sale (DROS) Entry System (DES). DES is a web-based application used by California firearms dealers to submit firearm background checks to the Department to determine if an individual is eligible to purchase, loan, or transfer a handgun or

1 long gun—and now ammunition—and subsequently receive background and
2 eligibility check determinations.

3 **A. Standard Ammunition Eligibility Checks**

4 16. Section 4302 of title 11 of the California Code of Regulations governs
5 Standard Ammunition Eligibility Checks.

6 17. To determine whether a purchaser or transferee (I will generally refer to
7 these together as “purchaser”) is eligible to purchase or possess (I will generally
8 refer to these together as “purchase”) ammunition under a Standard Ammunition
9 Eligibility Check, the Department, through an automated process in DES, cross-
10 references the purchaser’s name, date of birth, current address, and driver license or
11 other government identification number with the information maintained in the
12 Department’s Automated Firearms System.

13 18. If the purchaser’s information does not match an Automated Firearms
14 System entry, the transaction will be rejected. This usually occurs for one of two
15 reasons: (1) the purchaser’s name, date of birth, current address, driver license or
16 other identification number does not match an entry in the Automated Firearms
17 System and therefore the transaction is rejected; or (2) the purchaser does not have
18 a record in the Automated Firearms System.

19 19. If the purchaser’s information matches an Automated Firearms System
20 entry, the Department determines if the purchaser falls within a class of persons
21 who are prohibited from owning or possessing firearms and ammunition by cross-
22 referencing the Prohibited Armed Persons File (also known as the Armed
23 Prohibited Persons System). If the purchaser is prohibited from owning or
24 possessing firearms and ammunition, the transaction will be denied.

25 20. Purchasers who are rejected on a Standard Ammunition Eligibility Check
26 have the ability to electronically update one or more Automated Firearms System
27 records through the California Firearms Application Reporting System, which is
28 available on the Department’s website at: <https://cfars.doj.ca.gov>. People wishing

1 to correct their records will need to create a California Firearms Application
2 Reporting System account (if they do not already have one), log in, select the
3 “Automated Firearm System Personal Information Update” link, and then enter
4 their current personal information, firearm information, and personal information at
5 time of firearm purchase.

6 21. Address changes are systematically processed. I am informed and
7 believe that, once the application is submitted, and if a match is found in the
8 Automated Firearms System, the time it takes to update one’s address on the system
9 may take less than 10 minutes, but depending on the number of pending
10 applications, may take longer.

11 22. Name changes, identification number changes, and date of birth changes
12 require additional documentation be uploaded in order for an analyst to review and
13 validate the change. I am informed and believe that because an analyst must
14 validate the change, these transaction may take a few hours, but depending on
15 Department workload, can take several days (excluding weekends) to process and
16 subsequently update the record (assuming a match is found in the Automated
17 Firearms System).

18 23. If a person does not know the personal information that was used at the
19 time of purchase of the firearm, they can request to obtain information on all
20 firearms for which they are listed as the purchaser, transferee, or owner in the State
21 of California Automated Firearms System database by submitting an Automated
22 Firearms System Request for Firearm Records (BOF 053) application to the Bureau
23 of Firearms. That form is available on the Department’s website at: [https://oag.ca.](https://oag.ca.gov/firearms/forms)
24 [gov/firearms/forms](https://oag.ca.gov/firearms/forms).

25 24. Once the application is received by the Bureau of Firearms, the Bureau of
26 Firearms will conduct a diligent search of the Automated Firearms System for their
27 records and will provide the individual with the listing of their firearms records via
28 U.S. mail. The individual can then reference the listing (which notes their personal

1 information at time of purchase or transfer) and use it to submit an Automated
2 Firearm System Personal Information Update application to update their records.

3 **B. Basic Ammunition Eligibility Checks**

4 25. Section 4303 of title 11 of the California Code of Regulations governs
5 Basic Ammunition Eligibility Checks.

6 26. The Department was required by law to develop a procedure in which a
7 person who is not prohibited from purchasing or possessing ammunition may be
8 approved for a single ammunition transaction or purchase. In order to meet this
9 requirement, the Department developed the Basic Ammunition Eligibility Check
10 which closely mirrored the current background check for firearms (without
11 checking federal databases), thereby ensuring consistency in the eligibility checks.
12 A Department analyst manually reviews a purchaser or transferee's records to
13 ascertain the purchaser or transferor is not prohibited from owning or possessing
14 ammunition due to a felony or violent misdemeanor conviction or warrant,
15 domestic violence restraining order, mental health issue, or some combination of
16 these factors.

17 **C. COE Verification Checks**

18 27. Section 4305 of title 11 of the California Code of Regulations governs
19 Certificate of Eligibility Verification Checks.

20 28. To qualify for this type of check, a purchaser must have a current
21 Certificate of Eligibility issued by the Department. To determine if the purchaser
22 or transferee has a current Certificate of Eligibility, the Department, through an
23 automated process in DES, cross-references the Certificate of Eligibility database.
24 If the purchaser does not have a current Certificate of Eligibility, the transaction
25 will be rejected.

26 29. A Certificate of Eligibility Verification Check (COE Verification
27 Checks) may be rejected for the following reasons: (1) personal information
28 provided to the ammunition vendor and entered into DES does not match the

1 information in the Certificate of Eligibility database; (2) the Certificate of
2 Eligibility number provided to the ammunition vendor, and entered into DES does
3 not match the information in the Certificate of Eligibility database; or (3) the
4 Certificate of Eligibility for the purchaser is not current.

5 **II. THE CALIFORNIA DEPARTMENT OF JUSTICE UPGRADES THE DEALER**
6 **RECORD OF SALE ENTRY SYSTEM (DES) TO PROCESS AMMUNITION**
7 **SALES AND TRANSFERS**

8 30. Starting July 1, 2019, California ammunition vendors had access to DES
9 to submit ammunition eligibility checks to the Department, and subsequently
10 receive eligibility determinations through the system. DES also enables
11 ammunition vendors to report information relative to the sale or transfer of
12 ammunition to the Department, at the time of delivery, resulting in a systematic
13 update of the Ammunition Purchase Records File.

14 31. The Department took several steps in the lead-up to the July 1, 2019
15 implementation date. A number of updates were made to DES to implement the
16 new law. The user-facing side of these updates, and how to use them, were
17 described to licensed ammunition vendors in a series of notices and guides.

18 32. On June 7, 2019, the Bureau of Firearms distributed a notice entitled
19 “Ammunition Purchase Authorization Program.” The notice advised dealers that
20 effective July 1, 2019, ammunition vendor licensees would be prohibited from
21 providing a purchaser with ammunition without approval from the Department of
22 Justice, except as otherwise specified. It also advised that the “Ammunition
23 Purchases and Transfers” regulations were being finalized, what equipment would
24 be needed to process transactions through DES, how to enroll in DES, when full
25 access to DES would be available for licensed ammunition vendors, what
26 enhancements were made to DES, that the Department would be updating the DES
27 User Guide and creating an Ammunition Vendor User Guide and both would be
28 released at a later date, and it provided Customer Support Center hours of operation
as well as the contact number. Included with the notice was a Quick Reference

1 Guide that outlined how to create an account in DES (for licensed ammunition
2 vendors) and how to add new ammunition permissions to current users. A copy of
3 that notification and reference guides are attached to this declaration as Exhibit 3.

4 33. On June 28, 2019, the Bureau of Firearms distributed a notice entitled
5 “California Department of Justice Notification Regarding Regulations for
6 Ammunition Purchase or Transfers and Automated Firearms System Information
7 Updates.” The notice advised licensed ammunition vendors and firearms dealers
8 that effective July 1, 2019, persons seeking to purchase or transfer ammunition
9 would have to undergo an eligibility check, and be approved by the Department,
10 prior to the sale or transfer, except as otherwise specified. It also advised that
11 effective July 1, 2019, persons with an outdated Automated Firearms System record
12 would have the ability to correct or update personal information on their Automated
13 Firearms System record via the California Firearms Application Reporting System.
14 The notice provided information on where to locate the relevant regulations as well
15 as contact information for the Customer Support Center. A copy of that notice is
16 attached to this declaration as Exhibit 4.

17 34. On the same day, the Bureau of Firearms distributed a notice entitled
18 “Regarding Availability of Instructional User Guides Related to Upcoming
19 Ammunition Sale Requirements,” and a quick reference guide that provided
20 instructions on how to submit ammunition transactions. A copy of that notice and
21 quick reference guide is attached to this declaration as Exhibit 5.

22 35. Also on the same day, the Bureau of Firearms posted on its website
23 updated and new DES user guides relating to the ammunition sales requirements.
24 The user guides provide an overview of the DES functions and provide direction on
25 how to use the system in relation to ammunition transactions. Copies of those user
26 guides are attached to this declaration as Exhibits 6 and 7.

III. THE CALIFORNIA DEPARTMENT OF JUSTICE’S EMERGENCY REGULATIONS GOVERNING THE IDENTIFICATION REQUIREMENTS FOR FIREARMS AND AMMUNITION PURCHASES AND TRANSFERS

36. As a result of my job duties, I am aware that in 2015, the California Department of Motor Vehicles started issuing driver licenses and identification cards with the notation “FEDERAL LIMITS APPLY” printed on the front under California State Assembly Bill (AB) 60 (AB 60), Stats. 2013, Ch. 524.

37. I am also aware that, as of January 22, 2018 California driver licenses and identification cards with the words “FEDERAL LIMITS APPLY” on the front are now issued to both: (1) persons applying under AB 60; and (2) persons who are able to submit satisfactory proof that their presence in the United States is authorized under federal law, but choose not to apply for a “REAL ID” driver license or identification card. REAL ID driver licenses comply with minimum requirements for various official federal purposes, and do not bear the “FEDERAL LIMITS APPLY” disclaimer.

38. As a result of my job duties, I have learned that some firearms dealers refused to accept “FEDERAL LIMITS APPLY” licenses issued on or after January 22, 2018, because they have been advised by their attorneys or have heard from advocacy groups that such licenses are being issued to AB 60 applicants.

39. For purchasers with “FEDERAL LIMITS APPLY” driver licenses issued before January 22, 2018, it should be readily apparent from the face of the license whether the applicant is an AB 60 license holder. For those applicants with “FEDERAL LIMITS APPLY” licenses issued after January 22, 2018, however, there is no practical way to determine from the face of the license whether the applicant is an AB 60 license holder.

40. In response to these concerns, the Department issued a Finding of Emergency on June 7, 2019, stating the need to promulgate an emergency regulation addressing the identification requirements for firearms and ammunition

1 purchases and eligibility checks. A copy of that Finding of Emergency is attached
2 to this declaration as Exhibit 8.

3 41. The Finding of Emergency references a document titled “National Rifle
4 Association Institute for Legislative Action, California Special Alert: Update
5 Regarding Use of Non-REAL IDs for Firearm Purchases,” March 22, 2018 (NRA
6 Update). That document is part of the rulemaking file, to which I have access. A
7 true and correct copy of the NRA Update is attached to this declaration as
8 Exhibit 9.

9 42. The Finding of Emergency also references a document titled “U.S.
10 Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives,
11 Open Letter to All California Federal Firearms Licensees,” which was incorrectly
12 listed as being dated June 30, 2018. The correct date of the letter is June 30, 2016
13 (ATF June 2016 Letter). That document is part of the rulemaking file, to which I
14 have access. A true and correct copy of the ATF June 2016 Letter is attached to
15 this declaration as Exhibit 10.

16 43. Department records, to which I have access, also contain an April 9, 2018
17 letter from Michel & Associates, P.C. to Attorney General Xavier Becerra
18 regarding a Pre-Litigation Demand to Rescind Policy Prohibiting Purchase of
19 Firearms Using Non-Real IDs (Michel Letter). A true and correct copy of the
20 Michel Letter is attached to this declaration as Exhibit 11.

21 44. The Emergency Regulation was codified in the California Code of
22 Regulations at title 11, section 4045.1. It went into effect on June 27, 2019.

23 45. The same day, the Department issued an notice titled “California
24 Department of Justice Update Regarding the Use of ‘Federal Limits Apply’ Driver
25 License and Identification Cards to Perform Eligibility Checks.” A true and correct
26 copy of the notice is attached to this declaration as Exhibit 12.

IV. THE AMMUNITION ELIGIBILITY CHECK SYSTEM AND RULES GO INTO EFFECT ON JULY 1, 2019.

46. The ammunition eligibility check system went live the morning of July 1, 2019.

47. As part of my job duties, I can request data from the Department's Application Development Bureau regarding ammunition eligibility transactions. I have obtained data for the period starting July 1 and ending July 31, 2019—the first calendar month that the ammunition eligibility check process was in place.

48. Total number of ammunition transactions processed, including transactions that were rejected or where the purchaser was denied: 62,083.

49. At least 106 transactions were denied because prohibited persons had attempted to purchase ammunition.

50. Standard Ammunition Eligibility Checks: 57,553.

a. Standard Ammunition Eligibility Check approvals: 46,702.

b. Standard Ammunition Eligibility Check rejections: 10,837.

c. Standard Ammunition Eligibility Check denials: 14.

51. COE Verification Checks: 880.

a. COE Verification Check approvals: 768.

b. COE Verification Check rejections: 112 (this number may include denials).

52. Basic Ammunition Eligibility Checks: 3,798.

a. Basic Ammunition Eligibility Check approvals: 3,536.

b. Basic Ammunition Eligibility Check denials: 92.

c. Basic Ammunition Eligibility Check rejections: 22.

53. Average time to check a purchaser's eligibility in a Standard Ammunition Eligibility Check: 1 second.

54. Average time check a purchaser's eligibility in a COE Verification Check: 1 second.

1 55. Average time, in Standard Ammunition Eligibility Check, from when the
2 dealer submits the eligibility check to DES through when the dealer hits the
3 “Deliver” button at the end of the Submit Ammunition Purchase process (ending
4 the transaction in DES): 4 minutes, 57 seconds.

5 56. Average time, in COE Verification Check, from when the dealer submits
6 the eligibility check to DES through when the dealer hits the “Deliver” button at the
7 end of the Submit Ammunition Purchase process (ending the transaction in DES):
8 11 minutes, 5 seconds.

9 57. Based on my knowledge of DES and the ammunition eligibility check
10 process, I understand that these numbers provide a good estimate of how long the
11 average Standard Ammunition Eligibility Check and COE Verification Check take,
12 once the personal information field in DES is populated (most of which is done by
13 magnetic swipe), and excluding the time it takes to print and sign the Dealer Record
14 of Sale.

15 58. The COE Verification Check average is likely higher than the Standard
16 Ammunition Eligibility Check average because there are fewer COE Verification
17 Checks overall, and some outliers may have affected the average—e.g., transactions
18 where the eligibility check was submitted and the customer left the store and
19 returned the next day, creating a gap of several hours in the transaction.

20 59. I am aware that a number of nonparty ammunition vendors submitted
21 declarations in this matter representing the length of time it takes them to process
22 ammunition transactions. For each of these vendors, I requested and obtained data
23 from July 1 to and including July 31, 2019, showing the average time, in Standard
24 Ammunition Eligibility Check and COE Verification Checks, from when the dealer
25 submits the eligibility check to DES through when the dealer hits the “Deliver”
26 button at the end process (ending the transaction in DES).

27 60. Bill Ortiz and Turner’s Outdoorsman: 5 minutes, 17 seconds.

28 61. David Burwell and Norco Armory: 4 minutes, 31 seconds.

62. Chris Puehse and Foothill Ammo, Inc.: 2 minutes, 42 seconds.

63. Travis Morgan and Guns, Fishing and Other Stuff: 3 minutes, 46 seconds.

64. Ethan Bartel and Royal Loan: 3 minutes, 12 seconds.

65. Myra Lowder and Mosquito Creek Outfitters: 3 minutes, 38 seconds.

66. Daniel Gray and Discount Gun Mart: 6 minutes, 3 seconds.

67. I am also aware that Plaintiff Denise Welvang submitted a declaration in this matter representing the amount of time it took to process an ammunition transaction at Gun World in Burbank, California, on July 13, 2019. I requested records involving Ms. Welvang be pulled for that day.

68. The records show that she engaged in a Standard Ammunition Eligibility Check at Gun World on the afternoon of July 13. In that transaction, the time from when the vendor submitted the eligibility check through when the dealer hit the “Deliver” button at the end process (ending the transaction in DES) took less than a minute.

69. The records also show that before Ms. Welvang went to Gun World she purchased ammunition at American Gun Works. In that transaction, the time from when the vendor submitted the eligibility check through when the dealer hit the “Deliver” button at the end process (ending the transaction in DES) took just over a minute.

V. REPORTED ISSUES WITH THE AMMUNITION ELIGIBILITY CHECK SYSTEM.

70. Since the July 1, 2019 rollout of the ammunition eligibility check process on DES, the Department has received feedback and inquiries from the public.

71. The Department operates a Customer Support Center, which fields calls from hotlines for licensed firearms dealers and ammunition vendors, law enforcement agencies, Department certified instructors, and the public. The hotline for licensed firearms dealers and ammunition vendors is called the DES Customer

1 Support Center, and is available daily, 8:00 a.m. to 9:00 p.m. The center is
2 specifically intended to assist licensed firearms dealers and ammunition vendors
3 with their business needs. Firearms dealers and ammunition vendors may call the
4 center with technical questions.

5 72. During the first week of July, there was a spike in the number of calls per
6 day fielded by all members of the Customer Support Center. Most of those calls
7 related to ammunition purchases. For that first week, callers may have had to wait
8 or call back due to the high volume of calls. Since then, however, the number of
9 calls per day has dropped significantly, but remains above the monthly average.
10 The Bureau of Firearms anticipates a general increase in calls moving forward as a
11 new program has been implemented and that will continue to generate calls.

12 73. Since the ammunition eligibility check process has been in effect, the
13 Department has received notice of technical issues with DES and ammunition
14 eligibility checks. I am aware of some of the issues that have been raised, and the
15 steps that have been taken to address them. I will describe two examples of these
16 issues.

17 74. First, the week of July 1, the Department received notices that a few
18 Standard Ammunition Eligibility Checks were delayed due to the system not
19 accommodating people who have more than two first names. A fix was
20 implemented on July 25, 2019.

21 75. Second, there have been reports that the “Caliber” dropdown menu in the
22 “Transaction and Ammunition Information” step does not contain all calibers of
23 ammunition. I have been informed that the Department is currently researching
24 whether any calibers are missing and anticipates implementing a fix, if one is
25 necessary.

26 76. I am aware that a number of nonparty ammunition vendors submitted
27 declarations stating that they have been unsuccessful in having their magnetic card
28 readers populate the “gender, hair color, eye color, height, weight, place of birth,

1 and telephone number” fields in DES. Place of birth and telephone number are not
2 included on California driver licenses or identification cards, and therefore cannot
3 be populated using the magnetic card reader. With regard to the other fields, the
4 Department has not received any calls regarding the magnetic card reader not
5 populating gender, hair color, eye color, height, or weight. At this time, the
6 Department has no reason to believe that DES is preventing that information from
7 being populated by magnetic swipe.

8 77. I am aware that a number of nonparty ammunition vendors submitted
9 declarations suggesting that they cannot process ammunition transactions for
10 customers whose driver licenses or identification cards list a P.O. Box as their
11 address. I am also aware that these nonparty ammunition vendors have stated that
12 they believe that California law and Department regulations do not allow
13 ammunition vendors to manually edit a customer’s address as reflected on their
14 driver license or identification.

15 78. If the identification card or driver license has a P.O. Box listed, the dealer
16 can manually enter the current address into the “Personal Information” field in the
17 Standard Ammunition Eligibility Check. It is recommended, however, that dealers
18 obtain documentation from the purchaser with the purchaser’s current address to
19 verify what they are entering on the transaction is accurate. The Department is not
20 aware of any regulation or Penal Code that states ammunition vendors cannot
21 manually input or edit a customer’s address. The Department has issued guidance
22 regarding P.O. boxes on the Bureau of Firearms Frequently Asked Questions
23 website at: <https://oag.ca.gov/firearms/apfaqs>.

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing
2 is true and correct.

3
4 Executed on: August 2, 2019

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7 MAYRA G. MORALES
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CERTIFICATE OF SERVICE

Case Name: **Rhode v. Becerra** No. **3:18-cv-00802-BEN-JLB**

I hereby certify that on August 5, 2019, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

DECLARATION OF MAYRA G. MORALES IN SUPPORT OF DEFENDANT XAVIER BECERRA'S OPPOSITION TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on August 5, 2019, at Sacramento, California.

Tracie L. Campbell

Declarant

/s/ *Tracie Campbell*

Signature