

EXHIBIT 4

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

KIM RHODE, et al.,

Plaintiffs,

v.

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

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

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

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

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

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

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

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

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

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.

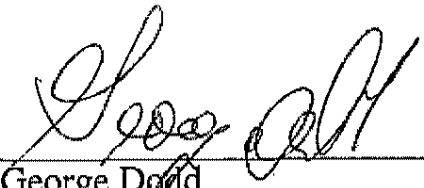
18 12. DOJ's regulations requiring firearm and ammunition purchasers using ID's
19 with the notation "FEDERAL LIMITS APPLY" to provide supplemental proof of lawful
20 U.S. presence will also require me to provide additional documentation when renewing
21 my Certificate of Eligibility. Without the necessary 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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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
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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