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21 Attorneys for Plaintiffs

22 **UNITED STATES DISTRICT COURT**

23 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

24 ADAM BRANDY, et al.,
25
26 Plaintiffs,

27 vs.

28 ALEX VILLANUEVA, in his official
capacity as Sheriff of Los Angeles
County, California, and in his capacity as

Case No. 2:20-cv-02874

**DECLARATION OF BRANDON
COMBS IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR TEMPORARY
RESTRAINING ORDER AND
ISSUANCE OF PRELIMINARY
INJUNCTION**

1 the Director of Emergency Operations, et
2 al.,

3 Defendants.
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6 **DECLARATION OF BRANDON COMBS**

7 I, Brandon Combs, declare as follows:

- 8 1. I am the President of Firearms Policy Coalition, Inc. (“FPC”).
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10 2. FPC is a non-profit organization incorporated under the laws of Delaware,
11 with a place of business in Sacramento, California.
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13 3. FPC’s mission is to defend and promote the People’s rights—especially the
14 fundamental, individual Second Amendment right to keep and bear arms—
15 advance individual liberty, and restore freedom. To that end, FPC’s purposes
16 are: (A) To protect and defend the Constitution of the United States and the
17 People’s rights, privileges and immunities deeply rooted in this Nation’s
18 history and tradition, especially the inalienable, fundamental, and individual
19 right to keep and bear arms; (B) To protect, defend, and advance the means
20 and methods by which the People of the United States may exercise those
21 rights, including, but not limited to, the acquisition, collection,
22 transportation, exhibition, carry, care, use, and disposition of arms for all
23 lawful purposes, including, but not limited to, self-defense, hunting, and
24 service in the appropriate militia for the common defense of the Republic
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and the individual liberty of its citizens; (C) To foster and promote the shooting sports and all lawful uses of arms; and, (D) To foster and promote awareness of, and public engagement in, all of the above.

4. FPC serves its members and the public through legislative advocacy, grassroots advocacy, litigation and legal efforts, research, education, outreach, and other programs.
5. FPC has members and supporters, who have all the indicia of membership, in the State of California. FPC also has members in the County of Los Angeles, the City of Los Angeles, the City of Burbank, and other jurisdictions, including those which Defendant County of Los Angeles and Defendant Sheriff Villanueva and his Los Angeles County Sheriff's Department provides law enforcement services.
6. FPC's members include Plaintiffs Adam Brandy, Jonah Martinez, Daemion Garro, Jason Montes, Alan Kushner, Tom Watt, Gun World, Match Grade Gunsmiths, The Target Range, and A Place To Shoot, Inc.
7. FPC represents its members and supporters—who include gun owners, individuals who wish to acquire firearms and ammunition, licensed California firearm retailers, shooting ranges, trainers and educators, and others—and brings this action on behalf of itself, its members, supporters who possess all the indicia of membership, and similarly situated members of the public.

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8. As detailed in the Plaintiffs’ First Amended Complaint, Plaintiffs, Plaintiffs’ members and customers, and other similarly situated individuals would exercise the fundamental human right to acquire, keep, bear, and practice proficiency training and shooting with arms – including firearms, ammunition, magazines, and appurtenances – for lawful purposes including self-defense, and would do so, but for fear of liability and prosecution under Defendants’ laws, orders, policies, practices, customs, and enforcement actions.

9. FPC has and continues to expend and divert resources, and has been and continues to be adversely and directly harmed, because of Defendants’ laws, policies, orders, practices, customs, and enforcement actions.


10. Accordingly, and for reasons set for in Plaintiffs’ application, I respectfully ask this Court to: (A) Declare that the operation of firearm and ammunition product manufacturers, retailers, importers, distributors, and shooting ranges are “essential” so that firearm and ammunition product manufacturers, retailers, importers, distributors, and shooting ranges may continue to operate; (B) Grant Plaintiffs’ application and issue a temporary restraining order and a preliminary injunction enjoining State and Local Defendants from enforcing their Orders and enforcement policies, practices, and customs that individually and/or collectively violate the Second, Fifth, and Fourteenth Amendments, to restore the status quo ante and so that firearm and ammunition product

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manufacturers, retailers, importers, distributors, and shooting ranges may continue to operate; and, (C) Grant all other and further relief, including injunctive relief, against Defendants as necessary to effectuate the Court’s judgment, or as the Court otherwise deems just and equitable.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 30, 2020.



Brandon Combs