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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 JOSH  
SAVANI 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.

4  
5  
6 **DECLARATION OF JOSH SAVANI**

7 I, Josh Savani, declare as follows:

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10 1. I am the Director of Research and Information of the National Rifle  
11 Association of America, Inc. (“NRA”).  
12  
13 2. NRA is a 501(c)(4) nonprofit corporation organized under the laws of the  
14 State of New York with its principal place of business in Fairfax, Virginia.  
15  
16 3. NRA has over 5 million members and supporters nationwide, including in  
17 California, and Los Angeles County, California.  
18  
19 4. These members include Plaintiff Jonah Martinez.  
20  
21 5. In Accordance with Article II of the NRA’s bylaws, the NRA’s purposes and  
22 objectives include “To protect and defend the Constitution of the United States,  
23 especially with reference to the God-given inalienable right of the individual  
24 American citizen guaranteed by such Constitution to acquire, possess ...  
25 transfer ownership of, and enjoy the right to use, keep and bear arms, in order  
26 that the people may exercise their individual rights of ... defense of family,  
27 person, and property.”  
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6. 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.

7. NRA 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.

8. 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 manufacturers,

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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.

Josh Savani 