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14 Attorneys for Plaintiffs

15 **UNITED STATES DISTRICT COURT**
16 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

17 DONALD MCDOUGALL, an
18 individual; JULIANA GARCIA, an
19 individual; SECOND AMENDMENT
20 FOUNDATION; CALIFORNIA GUN
21 RIGHTS FOUNDATION; and
22 FIREARMS POLICY COALITION,
23 INC.,

24 Plaintiffs,

25 vs.

26 COUNTY OF VENTURA,
27 CALIFORNIA; BILL AYUB, in his
28 official capacity; WILLIAM T. FOLEY,
in his official capacity; ROBERT
LEVIN, in his official capacity; and

Case No. 2:20-cv-02927

**DECLARATION OF ALAN
GOTTLIEB IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

1 VENTURA COUNTY PUBLIC
2 HEALTH CARE AGENCY,

3 Defendants.
4

5 **DECLARATION OF ALAN GOTTLIEB**

6
7 I, Alan Gottlieb, declare as follows:

- 8 1. I am the Executive Vice President of the Second Amendment Foundation, Inc.
9 (“SAF”).
10
11 2. SAF is a non-profit corporation organized under the laws of the State of
12 Washington with its principal place of business in Bellevue, Washington.
13
14 3. SAF has over 650,000 members and supporters nationwide, including in the
15 county of Ventura.
16
17 4. The purposes of SAF include promoting the exercise of the right to keep and
18 bear arms and legal action focusing on the constitutional right to privately own
19 and possess firearms.
20
21 5. SAF also promotes research and education on the consequences of abridging
22 the right to keep and bear arms and on the historical grounding and importance
23 of the right to keep and bear arms as one of the core civil rights of United
24 States citizens.
25
26 6. As detailed in the Plaintiffs’ First Amended Complaint, Plaintiffs, Plaintiffs’
27 members, and other similarly situated individuals would exercise the
28

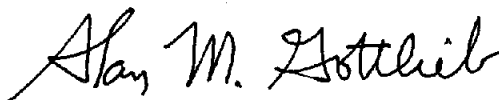
1 fundamental human right to acquire, keep, bear, and practice proficiency
2 training and shooting with arms – including firearms, ammunition, magazines,
3 and appurtenances – for lawful purposes including self-defense, and would do
4 so, but for fear of liability and prosecution under Defendants’ laws, orders,
5 policies, practices, customs, and enforcement actions.
6

7
8 7. SAF has and continues to expend and divert resources, and has been and
9 continues to be adversely and directly harmed, because of Defendants’ laws,
10 policies, orders, practices, customs, and enforcement actions.
11

12 8. Accordingly, and for reasons set for in Plaintiffs’ application and motion, I
13 respectfully ask this Court to grant motion for preliminary injunction.
14

15
16
17
18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed on April 14, 2020.

20 
21 Alan Gottlieb