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8 Attorneys for Plaintiffs Lance Boland, Mario  
Santellan, Reno May, Jerome Schammel, and  
9 California Rifle & Pistol Association,  
Incorporated

10  
11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **SOUTHERN DIVISION**

14 LANCE BOLAND, an individual;  
MARIO SANTELLAN, an individual;  
15 RENO MAY, an individual; JEROME  
SCHAMMEL, an individual; and  
16 CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED, a  
17 California corporation,

18 Plaintiffs,

19 v.

20 ROBERT BONTA, in his official  
capacity as Attorney General of the State  
21 of California; and DOES 1-10,

22 Defendants.

**CASE NO.: 8:22-cv-01421-CJC(ADSx)**

**DECLARATION OF LANCE  
BOLAND IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**Hearing Date: December 19, 2022**

**Hearing Time: 1:30 p.m.**

**Courtroom: 6B**

**Judge: Honorable Cormac J. Carney**

23 1. I, Lance Boland, am a plaintiff in the above-entitled action. I make this  
24 declaration of my own personal knowledge and, if called as a witness, I could and would  
25 testify competently to the truth of the matters set forth herein.

26 2. I am a current resident of Orange County, California.

27 3. I am a law-abiding adult who is not prohibited from owning firearms under  
28 the laws of the United States of America or the State of California. I have never been

1 found by any law enforcement agency, any court, or any other government agency to be  
2 irresponsible, unsafe, or negligent with firearms in any manner.

3 4. I operate a firearms training business. Individuals of all experience levels,  
4 but very often people with no previous firearms experience, come to my training school  
5 to learn how to safely handle and shoot handguns. Most of these people do so because  
6 they want to imminently acquire a firearm for self-defense and want to familiarize  
7 themselves beforehand.

8 5. Because essentially all on-Roster semiautomatic firearms are designed to  
9 favor right-handed shooters, left-handed shooters are at a disadvantage when they come  
10 to my training school, and are further disadvantaged when they go to lawfully purchase a  
11 handgun at a dealer and learn that the options are limited. There are many handguns  
12 featuring critical firearm controls that can be ergonomically optimized for left-handed  
13 shooters that I would like to obtain for training purposes and that I would recommend to  
14 my students, but the Roster impedes that from happening because these handguns are  
15 Off-Roster.

16 6. In my experience as a shooter and a trainer, being able to quickly activate  
17 the safety on a semi-automatic pistol to make it able to fire is vital in a self-defense  
18 scenario. I train my students that when a perpetrator is within 21 feet of them, if they are  
19 not drawing and firing their firearm, the perpetrator can close that gap and disarm them  
20 very quickly. A left-handed shooter is highly disadvantaged in a situation where they are  
21 forced to use a handgun that has an external safety that is designed for and intended to be  
22 used by a right-handed shooter. A left-handed shooter in that situation would need to  
23 transfer the firearm to their right hand to be able to manipulate the safety in the way it  
24 was designed to be used. That slows down the shooter and wastes precious time in a  
25 defensive encounter. If that isn't possible, then the position of the safety switch requires a  
26 left-handed shooter to spend additional time reaching to the off-side of their pistol  
27 because the switch on a right-handed pistol is on the outside of the left-handed shooter's  
28 hand and not readily visible—or requires the left-handed shooter to twist the pistol to be

1 able to see where the safety switch is as they are attempting to activate it—this can also  
2 cost vital time that can result in a perpetrator closing the gap and disarming the shooter.  
3 In either scenario, the left-handed operator is disadvantaged because they can't operate  
4 the handgun as it was designed to be operated and that slows down the operator when  
5 time is of the essence in a potentially life or death scenario.

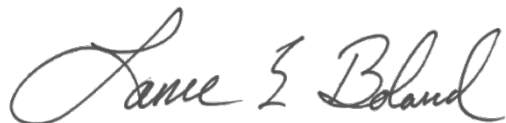
6 7. In my experience as a trainer, being able to quickly eject an empty magazine  
7 and reload a new magazine can also be vital in a self-defense scenario. Foremost, it is  
8 vital to enabling the shooter to take advantage of the benefit of a semi-automatic firearm:  
9 quick loading and reloading to be able to continue to fight off a perpetrator. Further,  
10 when semi-automatic pistols malfunction, the procedure for clearing them often includes  
11 ejecting and reinserting the magazine or inserting a new magazine. A left-handed shooter  
12 is highly disadvantaged in a situation where they must use a handgun that has a magazine  
13 release that is designed for and intended to be used by a right-handed shooter. A left-  
14 handed shooter in that situation would need to transfer the firearm to their right hand to  
15 be able to manipulate the magazine release in the way it was designed to be used. That  
16 slows down the shooter and wastes precious time in a defensive encounter. When the  
17 magazine release button is on the off-side of the shooter's strong hand, that makes it more  
18 difficult to ascertain where the release button is and press it if they can't switch their grip  
19 hand. Like with safety switches, if the magazine release is not in view of the shooter  
20 because it is on the outside of the pistol for a left-handed shooter, it may require the  
21 shooter to drop his or her aim and twist the pistol to be able to view the grip and ascertain  
22 where the button is. In a self-defense situation, this can cause the shooter to lose time to  
23 defend him or herself and cause the shooter to lose sight of the perpetrator. Both  
24 situations can make the shooter's ability to defend themselves much more difficult, and  
25 can turn a defensible situation into one that turns deadly for the victim.

26 8. In my experience as a shooter and trainer, the ability to quickly acuate the  
27 slide-release mechanism on a semiautomatic pistol is also critical for quickly operating  
28 the gun and clearing malfunctions. Virtually all semiautomatic firearms lock back the

1 action of the firearm in the open position once the magazine has been fully depleted of  
2 ammo. The shooter will then eject the empty magazine, insert a fresh magazine, and then  
3 need to depress the slide release to load a round of ammunition into the chamber of the  
4 gun for firing. This can be done very quickly for a right-handed shooter because the  
5 ergonomics are such that the left hand is perfectly positioned to depress the slide release  
6 after completing insertion of the new magazine, or the shooter's right-hand thumb can  
7 activate it quite easily as well. But its much harder for a lefthanded shooter to execute  
8 this manipulation, which delays re-gripping and re-aiming the pistol, when using a  
9 handgun that has right-handed controls. Without a doubt, a left-handed shooter is highly  
10 disadvantaged in a situation where they must use a handgun that has a slide release that is  
11 designed for and intended to be used by a right-handed shooter. A left-handed shooter in  
12 that situation would need to transfer the firearm to their right hand to be able to  
13 manipulate the slide release in the way the gun is designed to be used, or use their support  
14 hand in an unusual way. Having to do either slows down the shooter and wastes precious  
15 time in defensive encounter.

16 9. There are models of Off-Roster firearms that I would like to obtain in the  
17 primary retail market for my own self-defense purposes and for training purposes at my  
18 school, without having to incur the exorbitant price markups that are normal in the  
19 secondary market – if those firearms are even available in the secondary market. Without  
20 question, my left-handed students are disadvantaged by the limited selection of options  
21 the Roster imposes.

22 I declare under penalty of perjury of the laws of the State of California and the  
23 United States that the foregoing is true and correct. Executed within in the United States  
24 on November 15, 2022.

25   
26

27 Lance Boland  
28 Declarant