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

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

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

Plaintiffs,

v.

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

Defendants.

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

**DECLARATION OF MARIO
SANTELLAN 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

1. I, Mario Santellan, am a plaintiff in the above-entitled action. I 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 current resident of Orange County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under

1 the laws of the United States of America or the State of California. I have never been
2 found by any law enforcement agency, any court, or any other government agency to be
3 irresponsible, unsafe, or negligent with firearms in any manner.

4 4. I would purchase Off-Roster firearms such as a fifth generation Glock 19
5 and a Sig Sauer P365 at a firearms retailer if I were able to. I would attempt to purchase
6 those firearms at a retailer, but I am aware that it would not be lawful for a dealer to sell
7 an Off-Roster firearm to me. I would use these pistols for recreational target shooting and
8 lawful concealed carry.

9 5. I am aware that California law does not prohibit acquiring Off-Roster
10 handguns in private party transactions. I do not want to purchase an Off-Roster handgun
11 in a private party transaction because of the egregious price markups, the logistical
12 difficulty of coordinating with sellers, the limited availability of the Off-Roster firearms I
13 am interested in, and the fact that I would prefer to buy these handguns in new condition.

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

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Mario Santellan
Declarant