

1 C.D. Michel – SBN 144258
cmichel@michellawyers.com
2 Joshua Robert Dale – SBN 209942
jdale@michellawyers.com
3 Alexander A. Frank – SBN 311718
afrank@michellawyers.com
4 Konstadinos T. Moros – SBN 306610
kmoros@michellawyers.com
5 MICHEL & ASSOCIATES, P.C.
180 E. Ocean Boulevard, Suite 200
6 Long Beach, CA 90802
Telephone: (562) 216-4444
7 Facsimile: (562) 216-4445

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
California corporation,

17 Plaintiffs,

18 v.

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

21 Defendants.
22

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

**DECLARATION OF RENO MAY IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

23 1. I, Reno May, 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 Sonoma County, California.

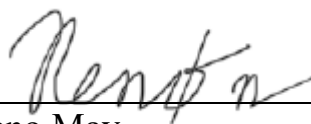
27 3. I am a law-abiding adult who is not prohibited from owning firearms under
28 the laws of the United States of America or the State of California. I have never been

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 would purchase Off-Roster firearms such as a fifth generation Glock 19
4 and a Sig Sauer P365, Ruger LCP Max, Smith & Wesson Shield Plus, and Staccato P, at
5 a firearms retailer if I were able to. I would attempt to purchase those firearms at a
6 retailer, but I am aware that it would not be lawful for a dealer to sell an Off-Roster
7 firearm to me. I would use these pistols for self-defense and other activities such as
8 recreational target shooting, competitive target shooting, and lawful concealed carry.

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

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

19 
20 _____
21 Reno May
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