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11 Attorneys for Plaintiffs

12 **UNITED STATES DISTRICT COURT**  
13 **SOUTHERN DISTRICT OF CALIFORNIA**

15 Lana Rae Renna; Danielle Jaymes; Laura  
16 Schwartz; Michael Schwartz; Robert  
17 Macomber; Clint Freeman; John Klier;  
18 Justin Smith; John Phillips; Cheryl  
19 Prince; Darin Prince; Ryan Peterson;  
20 PWGG, L.P.; North County Shooting  
21 Center, Inc.; Gunfighter Tactical, LLC;  
22 Firearms Policy Coalition, Inc.; San  
23 Diego County Gun Owners PAC;  
24 Citizens Committee for the Right to  
25 Keep and Bear Arms; and Second  
26 Amendment Foundation,

Plaintiffs,

v.

24 Robert Bonta, Attorney General of  
25 California; and Luis Lopez, Director of  
26 the California Department of Justice  
27 Bureau of Firearms,

Defendants.

Case No.: 20-cv-2190-DMS-DEB

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

Date:  
Time:  
Courtroom 13A (13th Floor)  
Hon. Dana M. Sabraw

1 I, Alan Gottlieb, declare:

2 1. I have personal knowledge of the matters set forth in this declaration, and  
3 would be able to testify competently to these facts if called as a witness.

4 2. I am the Executive Vice President of the Second Amendment  
5 Foundation, Inc. (“SAF”) and the Chairman of the Citizens Committee for the Right  
6 to Keep and Bear Arms (“CCRKBA”).

7 3. SAF is a non-profit educational foundation incorporated under the laws  
8 of Washington with its principal place of business in Bellevue, Washington. SAF  
9 seeks to preserve the effectiveness of the Second Amendment through educational and  
10 legal action programs. SAF has over 720,000 members and supporters nationwide,  
11 including thousands of members in California and many in the County of San Diego,  
12 California. SAF’s members include Individual Plaintiffs who desire to purchase  
13 constitutionally protected arms for self-defense or other lawful purposes which are not  
14 currently on or eligible under the Unsafe Handgun Act to be added to Defendants’  
15 Handgun Roster, and Retailer Plaintiffs who desire to sell the same to their eligible  
16 law-abiding customers. These members would each undertake the desired and  
17 protected activity but for the criminal liability that they face under the laws,  
18 regulations, policies, practices, and customs being challenged in this action.

19 4. CCRKBA is a nonprofit organization incorporated under the laws of  
20 Washington with its principal place of business in Bellevue, Washington. CCRKBA  
21 is dedicated to promoting the benefits of the right to bear arms. CCRKBA has  
22 thousands of members throughout California, including many in the County of San  
23 Diego, California. CCRKBA’s members include Individual Plaintiffs who desire to  
24 purchase constitutionally protected arms for self-defense or other lawful purposes  
25 which are not currently on or eligible under the Unsafe Handgun Act to be added to  
26 Defendants’ Handgun Roster and Retailer Plaintiffs who desire to sell the same to  
27 their eligible law-abiding customers. These members would each undertake the  
28 desired and protected activity but for the criminal liability that they face under the

1 laws, regulations, of perjury under the laws of the United States America and State of  
2 California that the foregoing is true and correct. Executed December 21, 2022.

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4 *Alan M. Gottlieb*

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8 ALAN GOTTLIEB

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