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Attorneys for Plaintiffs

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

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

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

**DECLARATION OF BRANDON COMBS IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

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

Plaintiffs,

v.

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

Defendants.

1 I, Brandon Combs, 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 CEO and President of Firearms Policy Coalition (“FPC”).

5 3. FPC is a non-profit organization incorporated under the laws of Delaware  
6 with its principal place of business in Clark County, Nevada.

7 4. As set forth in the organization’s founding documents, the purposes of  
8 FPC are:

9 a. To protect and defend the Constitution of the United States and the  
10 People's rights, privileges and immunities deeply rooted in this Nation's  
11 history and tradition, especially the inalienable, fundamental, and  
12 individual right to keep and bear arms;

13 b. To protect, defend, and advance the means and methods by which the  
14 People of the United States may exercise those rights, including, but not  
15 limited to, the acquisition, collection, transportation, exhibition, carry,  
16 care, use, and disposition of arms for all lawful purposes, including, but  
17 not limited to, self-defense, hunting, and service in the appropriate militia  
18 for the common defense of the Republic and the individual liberty of its  
19 citizens;

20 c. To foster and promote the shooting sports and all lawful uses of arms;  
21 and,

22 d. To foster and promote awareness of, and public engagement in, all of the  
23 above.

24 5. FPC’s efforts are focused on the right to keep and bear arms and adjacent  
25 issues including freedom of speech, due process, unlawful searches and seizures,  
26 separation of powers, asset forfeitures, privacy, encryption, and limited government.

27 6. FPC works to achieve the Organization’s mission—defending and  
28 promoting the People’s rights, especially the fundamental, individual Second

1 Amendment right to keep and bear arms, advancing individual liberty, and restoring  
2 freedom—through litigation, research, scholarly publications, amicus briefing,  
3 legislative and regulatory action, grassroots activism, education, outreach, and other  
4 programs.

5 7. FPC Law (FPCLaw.org) is the nation’s first and largest public interest  
6 legal team focused on the right to keep and bear arms and the leader in the Second  
7 Amendment litigation and research space.

8 8. The constitutional rights and interests that FPC seeks to protect in this  
9 lawsuit are germane to the organization’s purposes.

10 9. FPC typically has members and supporters in all 50 U.S. States and the  
11 District of Columbia. See <https://www.firearmspolicy.org/about>.

12 10. Plaintiffs Lana Rae Renna, Danielle Jaymes, Laura Schwartz, Michael  
13 Schwartz, John Klier, Justin Smith, John Phillips, Cheryl Prince, Darin Prince, Ryan  
14 Peterson, PWGG, L.P., North County Shooting Center, Inc., and Gunfighter Tactical,  
15 LLC, are members of FPC.

16 11. FPC has law-abiding members in the State of California, like and  
17 including the named Individual Plaintiffs, who desire to purchase constitutionally  
18 protected arms for self-defense or other lawful purposes but cannot because the arms  
19 are not currently on or eligible under California’s Unsafe Handgun Act to be added to  
20 Defendants’ Handgun Roster.

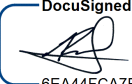
21 12. FPC has law-abiding members in the State of California, like and  
22 including the named Retailer Plaintiffs, who desire to sell constitutionally protected  
23 arms for self-defense or other lawful purposes but cannot because the arms are not  
24 currently on or eligible under California’s Unsafe Handgun Act to be added to  
25 Defendants’ Handgun Roster.

26 13. These individual and retailer members would each undertake the desired  
27 and protected activity but for the criminal liability that they face under the laws,  
28 regulations, policies, practices, and customs being challenged in this action.

1           14. FPC represents its members and supporters, who include gun owners,  
2 prospective gun owners, licensed California firearm retailers, and others, and brings  
3 this action on behalf of its members and similarly situated members of the public.

4           15. FPC’s members and similarly situated members of the public have been  
5 adversely and directly harmed by Defendants’ enforcement of the laws, regulations,  
6 policies, practices, and customs challenged in this case.

7           I declare under penalty of perjury under the laws of the United States America  
8 and State of California that the foregoing is true and correct. Executed on December  
9 22, 2022.

DocuSigned by:  
  
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BRANDON COMBS

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