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9  
 10 IN THE UNITED STATES DISTRICT COURT  
 11 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
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 14 **B&L PRODUCTIONS, INC., d/b/a**  
 15 **CROSSROADS OF THE WEST, et**  
 16 **al.,**

17 Plaintiffs,

18 v.

19 **GAVIN NEWSOM, et al.,**

20 Defendants.

8:22-cv-01518 JWH (JDEx)

**DECLARATION OF ELENE  
 MCGEE IN SUPPORT OF STATE  
 DEFENDANTS' SUPPLEMENTAL  
 BRIEF**

Date: February 10, 2023  
 Time: 9:00 a.m.  
 Courtroom: 9D  
 Judge: The Honorable John W.  
 Holcomb  
 Action Filed: August 12, 2022

21 I, Elene McGee, declare as follows:

22 1. I am employed by the California Department of Justice, Office of the  
 23 California Attorney General, in the Division of Law Enforcement, Bureau of  
 24 Firearms, as a Staff Services Manager II. My duties include planning, organizing,  
 25 directing and administering the work of professional staff responsible for a diverse  
 26 set of tasks and functions which are managed by four Staff Services Managers who  
 27 oversee the Training, Information and Compliance Unit and the Licensing and  
 28

1 Certificate of Eligibility Unit. I review and evaluate work flow and quality of  
2 work; ensure processing time lines and deadlines are met by all units; establish and  
3 maintain project priorities; monitor and exercise control over assigned  
4 resources/projects in accordance with DLE/Bureau policies and procedures; and  
5 make recommendations to bureau-level management. I implement new  
6 programs/procedures, manage projects and allocate resources. I have personal  
7 knowledge of the following facts, and if called as a witness, I could and would  
8 testify competently thereto.

9 2. The Bureau of Firearms maintains the Centralized List of Firearms  
10 Dealers, and the registry of all licensed ammunition vendors.

11 3. The dealers on the Centralized List of Firearms Dealers are eligible to  
12 sell firearms and ammunition as well as process private party transfers, internet  
13 sales, and pawn broker/consignment (if properly licensed) transactions in the State  
14 of California. In order to be eligible, they have to obtain: (1) a valid federal firearm  
15 license, (2) any regulatory or business license(s) required by local government, (3)  
16 a valid Seller's Permit issued by the California Department of Tax and Fee  
17 Administration, (4) a Certificate of Eligibility issued by the California Department  
18 of Justice, (5) a license granted by the licensing authority of the respective city and  
19 county, and (6) a valid listing on the DOJ Centralized List of Firearms Dealers.

20 4. Licensed Ammunition Vendors are eligible to sell ammunition in the  
21 State of California. To be eligible to sell ammunition in the State of California, the  
22 vendor must obtain: (1) a valid federal firearm license, if the applicant is federally  
23 licensed, (2) any regulatory or business license(s) required by local government, (3)  
24 a valid Seller's Permit issued by the California Department of Tax and Fee  
25 Administration, and (4) a certificate of eligibility issued by the Department of  
26 Justice.



**CERTIFICATE OF SERVICE**

Case **B&L Productions, Inc., et** No. **8:22-cv-01518 JWH**  
Name: **al. v. Gavin Newsom, et al.** **(JDEx)**

I hereby certify that on January 27, 2023, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**DECLARATION OF ELENE MCGEE IN SUPPORT OF STATE DEFENDANTS' SUPPLEMENTAL BRIEF**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on January 27, 2023, at Los Angeles, California.

Carol Chow  
Declarant

/s/Carol Chow  
Signature