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10 *of the State of California*

11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
13 WESTERN DIVISION  
14

15 **STEVEN RUPP; STEVEN**  
16 **DEMBER; CHERYL JOHNSON;**  
17 **MICHAEL JONES;**  
18 **CHRISTOPHER SEIFERT;**  
19 **ALFONSO VALENCIA; TROY**  
20 **WILLIS; and CALIFORNIA RIFLE**  
21 **& PISTOL ASSOCIATION,**  
22 **INCORPORATED,**

Plaintiffs,

23 v.

24 **ROB BONTA, in his official capacity**  
25 **as Attorney General of the State of**  
26 **California; and DOES 1-10,**

Defendants.

Case No. 8:17-cv-00746-JLS-JDE

**DECLARATION OF JOHN D.**  
**ECHEVERRIA IN SUPPORT OF**  
**DEFENDANT'S MOTION FOR**  
**SUMMARY JUDGMENT**

Date: July 28, 2023  
Time: 10:30 a.m.  
Courtroom: 8A  
Judge: Hon. Josephine L. Staton  
Trial Date: None set  
Action Filed: April 24, 2017

I, John D. Echeverria, hereby declare and state the following:

1. I am a Deputy Attorney General at the California Department of Justice and serve as counsel to Defendant Rob Bonta, in his official capacity as Attorney General of the State of California (“Defendant”), in the above-titled matter. I make this declaration in support of Defendant’s Motion for Summary Judgement. Unless otherwise stated, I have personal knowledge of the facts set forth herein and am competent to testify thereto.

2. In support of the concurrently filed Motion for Summary Judgment, Defendant relies on Defendant’s Exhibits 1 through 46, filed previously in support of and in opposition to the prior motions for summary judgment. *See* Dkts. 76, 90.

3. Attached hereto are true and accurate copies of the following additional exhibits, which Defendant also relies on in support of the concurrently filed Motion for Summary Judgment:

<b>Exhibit Number</b>	<b>Document Description</b>	<b>Page Number</b>
47	Supplemental Expert Report and Declaration of Lucy P. Allen	1558-1616
48	Supplemental Sur-Rebuttal Expert Report and Declaration of Lucy P. Allen	1617-1635
49	Supplemental Expert Report and Declaration of Dennis Baron	1636-1680
50	Supplemental Expert Report and Declaration of Ryan Busse	1681-1711
51	Corrected Supplemental Sur-Rebuttal Expert Report and Declaration of Ryan Busse	1712-1736
52	Supplemental Expert Report and Declaration of Saul Cornell	1737-1793
53	Supplemental Expert Report and Declaration of John J. Donohue	1794-1839
54	Supplemental Expert Report and Declaration of Louis Klarevas	1840-1945
55	Supplemental Sur-Rebuttal Expert Report and Declaration of Louis Klarevas	1946-1968
56	Supplemental Expert Report and Declaration of Brennan Rivas	1969-1992
57	Supplemental Expert Report and Declaration of Randolph Roth	1993-2066

<b>Exhibit Number</b>	<b>Document Description</b>	<b>Page Number</b>
58	Supplemental Sur-Rebuttal Expert Report and Declaration of Randolph Roth	2067-2090
59	Supplemental Expert Report and Declaration of Robert Spitzer	2091-2346
60	Supplemental Sur-Rebuttal Expert Report and Declaration of Kevin Sweeny	2347-2387
61	Supplemental Expert Report and Declaration of Colonel (Ret.) Craig Tucker	2388-2404
62	Supplemental Sur-Rebuttal Expert Report and Declaration of Colonel (Ret.) Craig Tucker	2405-2414
63	Supplemental Expert Report and Declaration of Michael Vorenberg	2415-2486
64	Supplemental Sur-Rebuttal Expert Report and Declaration of Michael Vorenberg	2487-2507
65	Advanced Research Projects Agency, Field Test Report, AR-15 Armalite Rifle (1962)	2508-2563
66	U.S. Army, Rifle & Carbine Manual, TC-3-22 (May 2016)	2564-2816
67	R. Blake Stevens & Edward C. Ezell, <i>The Black Rifle: M16 Retrospective</i> (1994) (excerpt)	2817-2821
68	Nick Kirkpatrick et al., <i>What Does an AR-15 Do to a Human Body? A Visual Examination of the Deadly Damage</i> , Wash. Post, Mar. 27, 2023, available at <a href="https://tinyurl.com/4vfz4y4b">https://tinyurl.com/4vfz4y4b</a> (interactive) (last visited May 25, 2023)	2822-2832
69	Wash. Post Staff, <i>We Spent 7 Months Examining the AR-15's Role in America. Here's What We Learned</i> , Wash. Post, Mar. 27, 2023	2833-2836
70	Alex Horton, et al., <i>Decades of Marketing Reinvented the AR-15 into a Top-Selling Firearm</i> , Wash. Post, Mar. 27, 2023	2837-2861
71	Hannah Allam, <i>Armed with AR-15s, Extremist and Militia Groups Anticipate Civil Unrest</i> , Wash. Post, Mar. 27, 2023	2862-2873
72	Todd C. Frankel, et al., <i>How the AR-15 Became a Powerful Political, Cultural Symbol in America</i> , Wash. Post, Mar. 27, 2023, available at <a href="https://tinyurl.com/26tpcmav">https://tinyurl.com/26tpcmav</a> (interactive) (last visited May 25, 2023)	2874-2895
73	Robert Klemko, <i>As Guns Saturate the United States, Police Turn to the AR-15</i> , Wash. Post, Mar. 27, 2023	2896-2906

<b>Exhibit Number</b>	<b>Document Description</b>	<b>Page Number</b>
74	Sally Buzbee, <i>Why We Are Showing the Impact of Bullets from an AR-15 on the Human Body</i> , Wash. Post, March 27, 2023	2907-2909
75	Michael Levenson, <i>Parents Were Asked to Give DNA Samples to Help Identify Victims</i> , N.Y. Times, May 25, 2022	2910-2911
76	Silvia Foster-Frau & Holly Bailey, <i>Sutherland Springs Survivors Haunted by an AR-15's Carnage, Trauma</i> , Wash. Post, Mar. 27, 2023	2912-2922
77	Alan Feuer, et al., <i>After Texas Mall Shooting, Searching for Motive and Grieving for Children</i> , N.Y. Times, May 8, 2023	2923-2926
78	Palmetto State Armory, About Palmetto State Armory, <a href="https://tinyurl.com/42kt2en3">https://tinyurl.com/42kt2en3</a> (last visited May 25, 2023)	2927-2935
79	Chris Linville, <i>AR-15 vs M4: Exploring Key Differences &amp; Similarities</i> , GunsAmericaDigest.com, May 18, 2023, <a href="https://tinyurl.com/2p8s5zbt">https://tinyurl.com/2p8s5zbt</a> (last visited May 25, 2023)	2936-2946
80	Jack Healy et al., <i>At Least 5 Dead and 25 Injured in Gunman's Rampage at an L.G.B.T.Q. Club in Colorado</i> , N.Y. Times, Nov. 20, 2022	2947-2954
81	Jeremy White & K.K. Rebecca Lai, <i>What We Know About the Gun Used in the Monterey Park Shooting</i> , N.Y. Times, Jan. 26, 2023	2955-2961
82	Adeel Hassan & Emily Cochrane, <i>What We Know About the Nashville School Shooting</i> , N.Y. Times, May 20, 2023	2962-2969
83	Kevin Williams et al., <i>Gunman Who Killed Five in Louisville Left Note and Bought Rifle Legally</i> , N.Y. Times, Apr. 11, 2023	2970-2975
84	J. David Goodman et al., <i>After Mass Killings in Texas, Frustration but No Action on Guns</i> , N.Y. Times, May 7, 2023	2976-2983
85	Mem. from Rep. Carolyn B. Maloney to Members of the H.R. Comm. on Oversight & Reform, July 27, 2022	2984-3007
86	The Violence Project, <i>Key Findings</i> , <a href="https://tinyurl.com/bdf4hsay">https://tinyurl.com/bdf4hsay</a> (last visited May 25, 2023)	3008-3019

Exhibit Number	Document Description	Page Number
87	Alex Yablon, <i>The Simple Physics that Makes Some Bullets Deadlier than Others</i> , The Trace, June 21, 2017	3020-3028

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 26, 2023, at San Francisco, California.

/s/ John D. Echeverria

John D. Echeverria  
Deputy Attorney General