

1 C.D. Michel – SBN 144258  
2 Sean A. Brady – SBN 262007  
3 Matthew D. Cubeiro – SBN 291519  
4 MICHEL & ASSOCIATES, P.C.  
5 180 E. Ocean Boulevard, Suite 200  
6 Long Beach, CA 90802  
7 Telephone: (562) 216-4444  
8 Facsimile: (562) 216-4445  
9 Email: cmichel@michellawyers.com

10 Attorneys for Plaintiffs

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

13 KIM RHODE, et al.,  
14 Plaintiffs,

15 v.

16 ROB BONTA, in his official capacity as  
17 Attorney General of the State of  
18 California,

19 Defendant.

Case No.: 3:18-cv-00802-BEN-JLB

**DECLARATION OF KIRK WEIR IN  
SUPPORT OF PLAINTIFFS**

**DECLARATION OF KIRK WEIR**

1  
2 1. I, Kirk Weir, make this declaration of my own personal knowledge and, if  
3 called as a witness, I could and would testify competently to the truth of the matters set  
4 forth herein.

5 2. I am a resident of Nevada County, California. I am a citizen of the United  
6 States who is not prohibited from owning or possessing firearms or ammunition under  
7 state or federal law. I am a permanently disabled veteran, small arms instructor, and  
8 CCW permit holder. I am a member of the California Rifle & Pistol Association,  
9 Incorporated, which is a plaintiff in this action.

10 3. I acquire ammunition for use in self-defense training and hunting. I also  
11 acquire it to keep for home-defense and self defense. California requires that hunters use  
12 non-lead ammunition, which is not as plentiful as lead ammunition.

13 4. Because local ammunition vendors regularly lack inventory of the common  
14 ammunition types that I need, especially the non-lead ammunition required for hunting in  
15 this state, and because it is a 30-minute round trip to the nearest ammunition vendor,  
16 prior to the challenged laws taking effect, I regularly acquired my ammunition from  
17 internet vendors that shipped directly to my residence. I could virtually always find the  
18 ammunition that I needed online, and often at a better price.

19 5. I have noticed marked price increases and scarcity of inventory of the  
20 ammunition I use at my local ammunition vendors since the challenged laws went into  
21 effect.

22 6. Because of the challenged laws, I cannot order online for direct shipment to  
23 my home. This has resulted in me having to spend more time and money trying to acquire  
24 the ammunition that I use from local vendors. And, on some occasions, I have been  
25 unable to find the ammunition that I need from local vendors, while it is regularly  
26 available from online vendors. But for the challenged laws, I would purchase ammunition  
27 from online vendors to have shipped directly to my residence.

28 ///

1 I declare under penalty of perjury that the foregoing is true and correct. Executed  
2 within the United States on August 15, 2023.

3  
4   
5 Kirk Weir  
6 Declarant  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

Case Name: *Rhode, et al. v. Bonta*  
Case No.: 3:18-cv-00802-JM-JMA

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, declare under penalty of perjury that I am a citizen of the United States over 18 years of age. My business address is 180 East Ocean Boulevard, Suite 200 Long Beach, CA 90802. I am not a party to the above-entitled action.

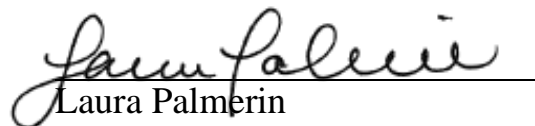
I have caused service of the following documents, described as:

**DECLARATION OF KIRK WEIR IN SUPPORT OF PLAINTIFFS**

on the following parties by electronically filing the foregoing on August 17, 2023, with the Clerk of the District Court using its ECF System, which electronically notifies them.

John D. Echeverria  
Deputy Attorney General  
[john.echeverria@doj.ca.gov](mailto:john.echeverria@doj.ca.gov)  
Anthony P. O'Brien  
Deputy Attorney General  
[anthony.obrien@doj.ca.gov](mailto:anthony.obrien@doj.ca.gov)  
Christina R.B. Lopez  
Deputy Attorney General  
[christina.lopez@doj.ca.gov](mailto:christina.lopez@doj.ca.gov)  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004  
*Attorneys for Defendant Attorney  
General Rob Bonta*

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 17, 2023, at Long Beach, CA.

  
Laura Palmerin