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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 PLAINTIFF KIM
RHODE**

DECLARATION OF PLAINTIFF KIM RHODE

1
2 1. I, Kim Rhode, 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 California and a plaintiff in this action. I am a law-abiding
6 citizen of the United States who is not prohibited from owning or possessing firearms or
7 ammunition under state or federal law.

8 3. I am a competitive double trap and skeet shooter. I have been a competitive
9 shooter for over 30 years. I am a six-time Olympic medal winner in those disciplines for
10 the United States of America. As such, I shoot thousands of rounds training to represent
11 the United States.

12 4. Prior to the Challenged Laws taking effect, I would acquire thousands of
13 rounds of specialized ammunition required for training and competitions that I participate
14 in via direct shipment from the manufacturer in bulk quantities, as well as from the
15 National Governing Body of the Olympic Committee, USA shooting. I would receive
16 those shipments either at my home or at a range where I was competing and training.
17 Oftentimes I received the ammunition at a range in Arizona when one of my competitions
18 would take place there and then transport the ammunition remaining after that
19 competition into California via a pick-up truck. Sometimes I would receive my allotment
20 from USA Shooting in Arizona for being on the U.S. Team and transport it home after
21 the match.

22 5. Because the Challenged Laws now prevent me from acquiring this
23 ammunition directly from the manufacturer or USA Shooting in either fashion, I have had
24 to leave a substantial amount of ammunition stored in Arizona and in Texas because I
25 could not bring it back into California on my person.

26 6. I have also had to make arrangements with various shooting range locations
27 in California to store my ammunition that is shipped to the ranges, but I cannot remove
28 that ammunition from any range's premises. I am constantly at the mercy of each range

1 as to whether I even have that option, because a range could refuse receipt. Dealing with
2 this is time away from my training and imposes burdens other Olympic athletes do not
3 have to face. There are also financial burdens, as I had to spend \$2,500 to \$3,200 for
4 several containers to store ammunition at various shooting ranges in California.
5 Exacerbating the problem is that the ammunition I use for Olympic competition is not
6 readily available for purchase at any California ammunition vendor or range and is
7 difficult to acquire. The ammunition that I use for training and competition is specialized
8 for exclusive use in International and Olympic matches, so it is not readily available. It
9 has a lower amount of shot and moves faster which makes it illegal to use in other
10 shooting competitions. If the range does not sell the ammunition that I need to train and I
11 do not have any ammunition shipped to them, then I cannot train at that range. This limits
12 where I can train to only a few ranges.

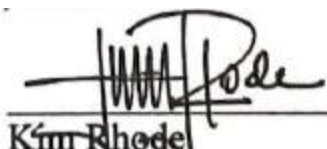
13 7. Prior to the Challenged Laws taking effect, I would also have self-defense
14 ammunition delivered directly to my home from out-of-state vendors.

15 8. But for the Challenged Laws, I would have my training and self-defense
16 ammunition shipped directly to my residence.

17 9. But for the Challenged Laws, I would have brought and would continue to
18 bring ammunition that I acquired in other states back to California on my person to use
19 for lawful purposes, including training, competition, and self-defense.
20

21 I declare under penalty of perjury that the foregoing is true and correct. Executed
22 within the United States on August 17, 2023.

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Kim Rhode
Declarant

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.

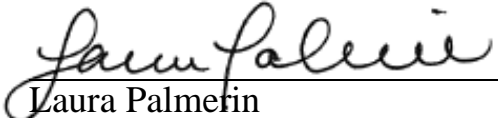
I have caused service of the following documents, described as:

DECLARATION OF PLAINTIFF KIM RHODE

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.

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


Laura Palmerin