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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 STEPHEN  
HOOVER IN SUPPORT OF  
PLAINTIFFS**

**DECLARATION OF STEPHEN HOOVER**

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

5 2. I am a resident of the State of Florida. I am a PhD candidate at the Center for  
6 Complex Systems and Brain Sciences in the Charles E. Schmidt College of Science at  
7 Florida Atlantic University. I am a citizen of the United States who is not prohibited from  
8 owning or possessing firearms or ammunition under state or federal law. I own firearms  
9 and have a Florida-issued CCW permit. I am a member of the California Rifle & Pistol  
10 Association, Incorporated, which is a plaintiff in this action.

11 3. I spent a significant amount of time in California in the Summer of 2023,  
12 and I plan to return for work and/or leisure purposes. Because I am not a resident of  
13 California, I cannot lawfully purchase ammunition in the state, with the limited exception  
14 of using it exclusively on-site at a licensed shooting range. There is thus no avenue for  
15 me to acquire ammunition for defense of myself and dwelling, or other lawful purposes,  
16 while staying in California.

17 4. On Wednesday, July 19th, 2023, I attempted to purchase ammunition at a  
18 sporting goods store located in Monterey, California. I asked two employees to check if  
19 they could sell me ammunition. One of the two employees called someone, I assume a  
20 supervisor, over the in-store telephone. I waited while the person on the other end of the  
21 phone conferred with the employee I was speaking with. The employee then informed me  
22 that I would not be allowed to purchase ammunition because I was not a California  
23 resident.

24 5. But for the challenged laws, which preclude non-residents of California like  
25 me, from purchasing ammunition outside of use at a licensed shooting range, I would buy  
26 ammunition while in California during my visits in the state for defense of my person and  
27 dwelling and other lawful purposes.

28 ///

I declare under penalty of perjury that the foregoing is true and correct. Executed within the United States on August 16, 2023.

A handwritten signature in blue ink, appearing to read "Stephen Hoover", is written over a horizontal line.

Stephen Hoover  
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 STEPHEN HOOVER 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.

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*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