

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 STEVEN
BAYRD IN SUPPORT OF
PLAINTIFFS**

DECLARATION OF STEVEN BAYRD

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2 1. I, Steven Bayrd, make this declaration of my own personal knowledge and,
3 if 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 citizen of the United States who is not
6 prohibited from owning or possessing firearms or ammunition under state or federal law.
7 I am a retired Los Angeles Sheriff's Department Reserve Deputy Sheriff. I am a member
8 of the California Rifle & Pistol Association, Incorporated, who is a plaintiff in this action.

9 3. My residence is located in a rural area of Riverside County. Because the
10 postal service will not deliver directly to my house, I use a Post Office Box to receive
11 mail. For that reason, my driver's license lists my P.O. Box and not my physical address.

12 4. Because I do not have my residential address on my driver's license, both
13 ammunition vendors I have attempted to purchase ammunition from have refused to
14 process my purchase through the State's system because they said I lacked sufficient
15 proof of residency to qualify to purchase ammunition under the challenged laws.

16 5. The local postmaster issued me a letter linking my P.O. box to my physical
17 address. Despite providing that letter and other documentation of my physical address
18 (bills) to them, no ammunition vendor has accepted such documentation as sufficient
19 proof of residency to qualify for purchasing ammunition under the challenged laws.

20 6. As a result, I have been unable to acquire ammunition from a licensed
21 vendor since the challenged laws took effect. But for the challenged laws, I would
22 purchase ammunition for home defense or other lawful purposes but I am unaware of any
23 lawful way for me to do so with my current ID under the challenged laws.

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

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Steven Bayrd
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.

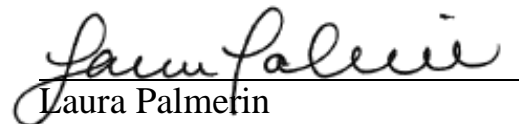
I have caused service of the following documents, described as:

DECLARATION OF STEVEN BAYRD 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
Anthony P. O'Brien
Deputy Attorney General
anthony.obrien@doj.ca.gov
Christina R.B. Lopez
Deputy Attorney General
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