

Case No. 23-4354 and 23-4356

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**IN THE UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

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RENO MAY, ET AL.,  
*Plaintiffs- Appellees,*

v.

ROB BONTA, IN HIS OFFICIAL CAPACITY AS  
ATTORNEY GENERAL OF CALIFORNIA,  
*Defendant-Appellant.*

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On Appeal from the United States District Court  
for the Central District of California  
No. 8:23-cv-01696-CJC-ADSx  
The Honorable Cormac J. Carney, Judge

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**APPELLEES' SUPPLEMENTAL EXCERPTS OF RECORD  
VOLUME I OF I**

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C. D. Michel  
Joshua Robert Dale  
Alexander A. Frank  
Konstadinos T. Moros  
MICHEL & ASSOCIATES, P.C.  
180 East Ocean Blvd., Suite 200  
Long Beach, CA 90802  
(562) 216-4444  
[cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)

Donald Kilmer  
Law Offices of Donald Kilmer, APC  
14085 Silver Ridge Rd.  
Caldwell, Idaho 83607  
(408) 264-8489  
[don@dklawoffice.com](mailto:don@dklawoffice.com)

*Counsel for Plaintiffs-Appellants*

*(Additional caption appears on next page)*

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February 16, 2024

SER-0001

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**IN THE UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

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MARCO ANTONIO CARRALERO, ET AL.,  
*Plaintiffs-Appellants,*

v.

ROB BONTA, IN HIS OFFICIAL CAPACITY AS  
ATTORNEY GENERAL OF CALIFORNIA,  
*Defendant-Appellee.*

---

On Appeal from the United States District Court  
for the Central District of California  
No. 8:23-cv-01798-CJC-ADSx  
The Honorable Cormac J. Carney, Judge

---

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
4 [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
5 Konstadinos T. Moros – SBN 306610  
6 [kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
7 MICHEL & ASSOCIATES, P.C.  
8 180 E. Ocean Blvd., Suite 200  
9 Long Beach, CA 90802  
10 Telephone: (562) 216-4444  
11 Facsimile: (562) 216-4445

12 Donald Kilmer-SBN 179986  
13 Law Offices of Donald Kilmer, APC  
14 14085 Silver Ridge Road  
15 Caldwell, Idaho 83607  
16 Telephone: (408) 264-8489  
17 Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF ALAN  
GOTTLIEB IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF ALAN GOTTLIEB**

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1. I, Alan Gottlieb, am the Vice President of Plaintiff Second Amendment Foundation (hereinafter “SAF”). I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. SAF is a non-profit membership and donor-supported organization classified under IRC section 501(c)(4) and incorporated under the laws the state of Washington with its headquarters in Bellevue, Washington.

3. SAF has over 700,000 members and supporters nationwide, including thousands of members in California. SAF is dedicated to promoting a better understanding about our constitutional heritage to privately own, possess, and carry firearms through educational and legal action programs designed to better inform the public about gun control issues.

4. SAF has been a pioneer in innovative defense of the right to keep and bear arms, through its publications and public education programs like the Gun Rights Policy Conference. SAF also expends significant sums of money sponsoring public interest litigation to defend its own interests to disseminate information to like-minded individuals, in an individualized setting like a gun show, but SAF also seeks to defend the interests of its members in lawsuits like this present effort.

5. Many SAF members in California have valid and current concealed carry weapon (“CCW”) permits, which enables them to lawfully carry a concealed firearm in public, so that they can defend themselves (and potentially others) with lethal force in the event of a life-threatening emergency situation.

6. Because SB 2 would prohibit SAF’s members in California from carrying in many places where they often carry and are accustomed to concealed carrying a firearm, the utility of their CCWs, and thus their right to be armed for self-defense in public, will be severely curtailed and outright eliminated in many common locations.

1 7. For example, under SB 2 they cannot carry where alcohol for consumption  
2 on the premises is served. That means they cannot conceal carry at restaurants they  
3 patronize on a regular basis, nor carry in the parking area outside such an  
4 establishment.

5 8. SB 2 also prohibits SAF members in California from concealed carrying in  
6 parks and public lands they often frequent. And under SB 2, carry is prohibited at  
7 urgent care facilities which SAF members have used in the past for rapid medical  
8 attention and would use in the future. Under SB 2, carry is prohibited at financial  
9 institutions such as banks that SAF members frequent.

10 9. Perhaps most significantly, under SB 2, concealed carry is prohibited at any  
11 privately owned commercial establishment that does not affirmatively display  
12 notice that the establishment tolerates concealed carry at the establishment's  
13 premises. There are many local businesses that SAF members frequent that will  
14 likely not post such signs, forcing them to either not carry there or stop patronizing  
15 them.

16 10. These are just a few examples of how SB 2 harms our members. Suffice it to  
17 say, SAF believes that SB 2 is abhorrent and incompatible with the general right of  
18 Americans, including Californians who are SAF members, to carry a firearm in  
19 public for self-defense.

20  
21 I declare under penalty of perjury that the foregoing is true and correct.  
22 Executed within in the United States on September 29, 2023.

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25 Alan Gottlieb,  
26 Declarant for Plaintiff SAF  
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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

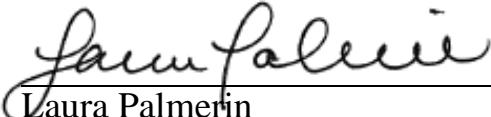
**DECLARATION OF ALAN GOTTLIEB IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
4 [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
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18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF ANDREW  
HARMS IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF ANDREW HARMS**

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1. I, Andrew Harms, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of Los Angeles County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

4. I have a valid and current California concealed carry weapon (“CCW”) permit issued by the Glendale Police Department.

5. I legally carry a concealed firearm with me on a daily basis, so that I may be armed and be able to defend myself, my wife, our two children, and potentially others in the event of a life-threatening emergency situation. Prior to SB 2, I only didn’t carry my pistol when planning on going to one of the few places where carry was not permitted, such as a school or courthouse, or when I intended to have a drink with dinner.

6. Because SB 2 will prohibit me from carrying in many places where I am accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus my right to be armed for self-defense in public, will be outright eliminated in nearly all common contexts.

7. For example, under SB 2 I cannot carry in any establishment where alcohol is served, even if I do not intend to drink. That means I cannot conceal carry at most of the restaurants that I patronize on a regular basis, nor can I even carry in the parking area of such an establishment.

8. As the father of two young children, places like parks, playgrounds, and public libraries are regular places I go to with my children. Under SB 2, I cannot



1 carry in any of those places and thus cannot effectively protect my children.

2 9. Those two provisions of SB 2 are hardly the only two that will impact me. I  
3 can't carry while I stop at a gas station to fill up my car, because most gas stations  
4 sell lottery tickets inside, making them off-limits for carry. Under SB 2, carry is  
5 also prohibited at urgent care facilities which I have utilized in the past for medical  
6 attention and would use in the future. Carry is also prohibited at financial  
7 institutions such as my local bank that I frequent, and a variety of other places that I  
8 regularly visit.

9 10. Perhaps most significantly, under SB 2, concealed carry is prohibited at any  
10 privately owned commercial establishment that does not affirmatively display  
11 notice that the establishment tolerates concealed carry at the establishment's  
12 premises. There are many local businesses that I frequent that will likely not post  
13 such signs, forcing me to either not carry there or stop patronizing them. Even the  
14 ones that are willing to post such signs may be off limits for other reasons, like  
15 when they share a parking lot with a business that sells alcohol.

16 11. These are, of course, just a few examples of how SB 2 will affect me, and as  
17 I go about my daily life, I am sure to discover several more. SB 2 will essentially  
18 destroy my constitutional right to carry, as so few of the places I go to on a daily  
19 basis will permit carry, and I don't want to expose my firearm to theft by constantly  
20 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would  
21 continue to carry in all of these places as I did before the law took effect.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed on September 29, 2023.

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Andrew Harms  
Declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

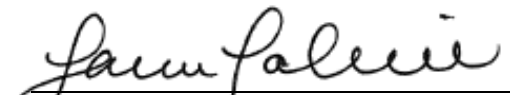
**DECLARATION OF ANDREW HARMS IN SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
cmichel@michellawyers.com  
2 Sean A. Brady – SBN 262007  
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10 Attorneys for Plaintiffs

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13 **SOUTHERN DIVISION**

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17 ISABELLE R. BARRETTO, an  
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18 individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
19 individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
20 DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
21 OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
22 OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
23 CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

24 Plaintiffs,

25 v.

26 ROBERT BONTA, in his official  
capacity as Attorney General of the  
27 State of California, and DOES 1-10,

28 Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF ANTHONY  
MIRANDA IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF ANTHONY MIRANDA**

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1. I, Anthony Miranda, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of Kings County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

4. I have a valid and current California concealed carry weapon (“CCW”) permit issued by the Kings County Sheriff’s Department.

5. I legally carry a concealed firearm with me on a daily basis, so that I may be armed and be able to defend myself and potentially others in the event of a life-threatening emergency situation. Prior to SB 2, I only didn’t carry my pistol when planning on going to one of the few places where carry was not permitted, such as a school or courthouse, or when I intended to have a drink with dinner.

6. Because SB 2 would prohibit me from carrying in many places where I am accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus my right to be armed for self-defense in public, will be outright eliminated in nearly all common contexts.

7. For example, under SB 2 I cannot carry in any establishment where alcohol is served, even if I do not intend to drink. That means I cannot conceal carry at most of the restaurants that I patronize on a regular basis, such as Chili’s, Applebees, Buffalo Wild Wings, and local establishments such as Figaro’s in Hanford, El Tarasco in Hanford, and Sal’s in Selma. Nor can I even carry in the parking area of such establishments. Under SB 2, I also cannot carry at the Hanford mall that I often visit for shopping and going to movies because it has restaurants that serve

1 alcohol, making the mall and its parking lot out of bounds under SB 2.

2 8. Those two provisions of SB 2 are hardly the only two that will impact me. I  
3 can't carry while I stop at a gas station to fill up my car, because most gas stations  
4 sell lottery tickets inside, making them off-limits for carry. Under SB 2, carry is  
5 also prohibited at urgent care facilities which I have utilized in the past for medical  
6 attention and would use in the future. Carry is also prohibited at financial  
7 institutions such as my local bank that I frequent, and a variety of other places that I  
8 regularly visit.

9 9. Because SB 2 forbids carry in playgrounds, it restricts me walking around  
10 within the community I live in while carrying, because the community has a  
11 playground in the middle of it. That playground and all streets or sidewalks  
12 adjacent to it are now off-limits. The mailbox I regularly walk to in order to retrieve  
13 my mail, for example, is right across the street from the playground.

14 10. A major fear of mine in relation to SB 2 however is that it restricts carry in  
15 churches. In recent years, there have been numerous attacks on people of faith at  
16 places of worship. For that reason, prior to SB 2, I always carried at church. SB 2  
17 takes that right away from me, but I know that it will not stop any violent criminals  
18 from carrying unlawfully into my church. SB 2 disarms me and other peaceable  
19 individuals who respect the law, thereby empowering criminals.

20 11. These are, of course, just a few examples of how SB 2 affects me, and as I  
21 go about my daily life, I am sure to discover several more. SB 2 has essentially  
22 destroyed my constitutional right to carry, as so few of the places I go to on a daily  
23 basis will permit carry, and I don't want to expose my firearm to theft by constantly  
24 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would  
25 continue to carry in all of these places as I did before the law took effect.

26

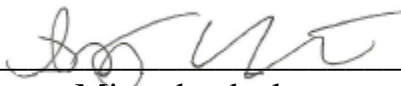
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 29, 2023.

  
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Anthony Miranda, declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

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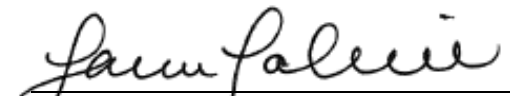
**DECLARATION OF ANTHONY MIRANDA IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

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

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California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

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18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
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21 **SOUTHERN DIVISION**

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28 individual; BARRY BAHRAMI, an  
individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF BARRY  
BAHRAMI IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney



**DECLARATION OF BARRY BAHRAMI**

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1. I, Barry Bahrami, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of San Diego County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

4. I have a valid and current California concealed carry weapon (“CCW”) permit issued by the San Diego County Sheriff’s Department and have carried for over twenty years.

5. I carry on a daily basis, so that I may be armed and be able to defend myself, and *far* more importantly, my children, in the event of a life-threatening emergency situation. Prior to SB 2, I only didn’t carry my pistol when planning on going to one of the few places where carry was not legally permitted, such as a school or courthouse, or when I intended to have a drink with dinner.

6. In my 20 years with a CCW permit, I have carried concealed virtually everywhere it is legal to do so including sports events, public parks, public buildings, and on public transit. Not once has there ever been a single issue nor has my gun ever magically jumped out of the holster and started shooting anyone. It is my chosen method to keep myself and my family safe. I am trained and capable of using my concealed firearm to protect my family should it ever become necessary.

7. My son is 10 and my daughter is 9. I am a very active and involved father. It's a job I absolutely love. We go everywhere California has to offer. I do mean everywhere. My son is a massive train fan and he especially loves freight trains. And so we are often near the railroad to watch them go by, at all hours of the

1 day and (mostly) night. We are also often by the railyard to watch the freight trains  
2 depart and arrive, which is in a fairly troubled part of town where crime happens  
3 from time to time. We frequently ride the trains too, and I carry when we do so as  
4 allowed by law. This includes weekend trips between Oceanside and San Clemente  
5 on the Metrolink to get ice cream by the pier.

6 8. My daughter loves animals, so we are often at zoos, in and around Balboa  
7 Park, the cliffs (a state park) and other areas you can probably imagine. Balboa  
8 Park itself has crime issues, and so I’m sure to always carry there as well.

9 9. As the father of two children, you can imagine we are also at public parks  
10 and playgrounds - a lot. The public park where my son likes to launch his model  
11 rocket is next to a school. Children running around are the perfect soft target for  
12 deranged and evil individuals. And as a licensed concealed carrier, I have always  
13 been armed and ready to protect my children.

14 10. Both of my children also enjoy public libraries, and we visit both the local  
15 Encinitas Library on Cornish Drive, as well as the San Diego Central Library when  
16 we are downtown.

17 11. Now, California and our “leadership” under Governor Newsom want to  
18 effectively take away my right to defend my children by turning nearly everywhere  
19 into a so-called “sensitive place”. Governor Newsom, of course, will not be giving  
20 up armed security for *his* family or *his* children - “sensitive place” or not - but I am  
21 to disarm even though no criminal will obey this foolish law.

22 12. Because SB 2 will prohibit me from carrying in many places where I am  
23 accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus  
24 my right to be armed for self-defense in public, will be outright eliminated in nearly  
25 all common contexts. I will be legislated out of my Constitutionally guaranteed  
26 right to bear arms and put in a position where I must break the law to protect my  
27 children in any meaningful way. The law will only serve to disarm me and make  
28 my entire family defenseless at the crucial moment when we need our second

1 amendment right the most.

2 13. These are, of course, just a few examples of how SB 2 will affect me, and as  
3 I go about my daily life, I am sure to discover several more. SB 2 will essentially  
4 destroy my constitutional right to carry, as so few of the places I go to on a daily  
5 basis will permit carry, and I don't want to expose my firearm to theft by constantly  
6 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would  
7 continue to carry in all of these places as I did before the law took effect.

8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed on September 29, 2023.

*Barry Bahrami*

\_\_\_\_\_  
Barry Bahrami  
Declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

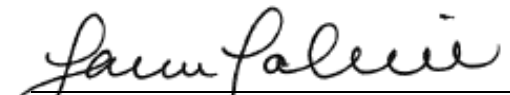
**DECLARATION OF BARRY BAHRAMI IN SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
cmichel@michellawyers.com  
2 Sean A. Brady – SBN 262007  
sbrady@michellawyers.com  
3 Konstadinos T. Moros – SBN 306610  
kmoros@michellawyers.com  
4 MICHEL & ASSOCIATES, P.C.  
180 E. Ocean Blvd., Suite 200  
5 Long Beach, CA 90802  
Telephone: (562) 216-4444  
6 Facsimile: (562) 216-4445

7 Donald Kilmer-SBN 179986  
Law Offices of Donald Kilmer, APC  
8 14085 Silver Ridge Road  
Caldwell, Idaho 83607  
9 Telephone: (408) 264-8489  
Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

10 Attorneys for Plaintiffs

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **SOUTHERN DIVISION**

14 RENO MAY, an individual;  
15 ANTHONY MIRANDA, an individual;  
ERIC HANS, an individual; GARY  
16 BRENNAN, an individual; OSCAR A.  
BARRETTO, JR., an individual;  
17 ISABELLE R. BARRETTO, an  
individual; BARRY BAHRAMI, an  
18 individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
19 individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
20 DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
21 OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
22 OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
23 CALIFORNIA RIFLE & PISTOL  
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24 Plaintiffs,

25 v.

26 ROBERT BONTA, in his official  
capacity as Attorney General of the  
27 State of California, and DOES 1-10,

28 Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF BRIAN R.  
MARVEL, PRESIDENT OF PEACE  
OFFICERS RESEARCH  
ASSOCIATION OF CALIFORNIA IN  
SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY  
INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF BRIAN R. MARVEL**

1  
2 I, Brian R. Marvel, declare:

3 1. Since 2018, I have served as the elected President of Peace Officers  
4 Research Association of California (“PORAC”). I am a Police Officer, and as the  
5 President of PORAC, I represent the interests of law enforcement on a daily basis  
6 both in California and nationally. I also serve on the Governor’s Medal of Valor  
7 Review Board, and the California Peace Officers Memorial Foundation  
8 (“CPOMF”). I am a former Navy veteran qualified as a small arms instructor and  
9 armorer.

10 2. Founded in 1953, PORAC is a professional federation of local, state,  
11 and federal law enforcement agencies that represents over 80,000 law enforcement  
12 and public safety professionals in California. It is the largest law enforcement  
13 organization in California and the largest statewide association in the Nation. It has  
14 a significant presence in Sacramento where it lobbies on behalf of its membership.

15 3. PORAC’s mission is to maintain a leadership role in organizing,  
16 empowering, and representing the interests of rank-and-file peace officers. It works  
17 to identify the needs of the law enforcement community and provide programs to  
18 meet those needs through conducting research, providing education and training,  
19 and defining and enhancing standards for professionalism. Its goal is to protect the  
20 rights and benefits of officers while also creating an environment in which the law  
21 enforcement community can interact and work toward achieving common goals and  
22 objectives.

23 4. PORAC believes that law-abiding citizens have a Constitutional right  
24 to be armed for self-defense. Self-defense "is one of the inalienable rights  
25 guaranteed by the constitution of the state.” (*People v. McDonnell* (1917) 32  
26 Cal.App. 694; Cal. Const. Art. 1, § 1.) “Central to the rights guaranteed by the  
27 Second Amendment is ‘the inherent right of self-defense.’” (*United States v.*  
28 *Torres*, 911 F.3d 1253 (9th Cir. 2019), citing *District of Columbia v. Heller*, 554

1 U.S. 570 (2008).) Thus, the Second Amendment is an important part of American  
2 life for both law enforcement officers and members of the public. Armed citizens  
3 do for themselves what law enforcement cannot always be there to do.

4 5. I am submitting this declaration because California’s newly enacted  
5 Penal Code section 26230, passed as part of S.B. 2, is out of step with PORAC’s  
6 values. PORAC believes in encouraging citizens who wish to exercise their  
7 Constitutional right to carry to go through the legal process to do so and acquire  
8 concealed handgun licenses (“CCW permits”). S.B. 2 undermines that goal by  
9 rendering CCW permits effectively impossible to exercise in California by defining  
10 nearly every location a purported “sensitive place” where carry is prohibited. This  
11 will undoubtedly discourage people from even applying for CCW permits, which is  
12 perhaps part of the goal behind the law.

13 6. PORAC supports criminal background investigations, firearm safety  
14 training and proficiency verifications, but PORAC must oppose Senate Bill  
15 (“S.B.”) 2 unless amended to incorporate sensitive places definitions that are  
16 consistent with *New York State Rifle & Pistol Association, Inc. v. Bruen*, 142 S.Ct.  
17 2111 (2022). As our members have a duty both to enforce California criminal  
18 statutes and to uphold the Constitution, firearm legislation primarily targeting law-  
19 abiding citizens must be carefully and constitutionally drafted.

20 7. While PORAC agrees with some of the sensitive places listed in  
21 section 26230, such as schools, courthouses and polling places, under S.B. 2 nearly  
22 every public place is designated a “sensitive place” where carry is forbidden, even  
23 with a CCW permit. The expansiveness of this legislation’s “sensitive places”  
24 definition is exceeded only by the outright prohibition on concealed carried in the  
25 New Mexico Department of Health's “Public Health Emergency Order Imposing  
26 Temporary Firearm Restrictions” which was enjoined on September 13, 2023.  
27 (Nat'l Ass'n for Gun Rts. v. Grisham, No. 1:23-CV-00771-DHU-LF, 2023 WL  
28 5951940 (D.N.M. Sept. 13, 2023).) Law abiding citizens would be deemed

1 criminals in California simply for exercising their constitutional right to bear arms,  
2 while a criminal intent on causing harm with a firearm will not be deterred by these  
3 sensitive places designations. In fact, someone intent on committing a mass murder  
4 will likely chose to do so in a “sensitive” place, where he or she is less likely to  
5 encounter armed victims.

6 8. The existing sensitive places definitions provide a proper balancing of  
7 legitimate safety concerns against self-defense rights. S.B. 2 fails to adhere to the  
8 directive of the Supreme Court in *Bruen*, and instead seeks to obviate its efficacy.  
9 This legislation is so extreme, S.B. 2 even bans carry in private businesses open to  
10 the general public unless the property owners affirmatively puts up a sign  
11 welcoming people with firearms. Many businesses may be hesitant to post such  
12 notices for fear of being forced into a political controversy or pressured by public  
13 officials. The prohibition even extends to public transposition, imposing  
14 discriminatory impacts on people of lesser means and harming the environment.

15 9. PORAC’s members will be required to enforce this law, which will  
16 subject them to claims of civil rights violations and discrimination from otherwise  
17 law-abiding citizens. Enforcement of this legislation is also likely to lead to  
18 negative interactions with members of the public that may damage public  
19 confidence in law enforcement or lead to avoidable assaults on officers.

20 10. Moreover, the Assembly Committee on Appropriations estimates that  
21 the costs of implementing this bill will be as high as \$16.8 million for the state  
22 Department of Justice in fiscal year 2025-26 and an ongoing cost of \$13.9 million  
23 annually.

24 [https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill\\_id=202120220](https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=202120220)  
25 [SB2#](#) The report also found that “unknown but significant” reimbursable costs will  
26 be imposed on local law enforcement agencies.

27 11. These costs will divert PORAC members from suppressing and  
28 investigating crimes and instead require them to implement a Constitutionally



1 suspect licensing regime which will not improve public safety. "In California, no  
2 shooting by a CCW holder has ever occurred at an existing protected location or  
3 one proposed by S.B. 2." (*SB 2 – A Law in Search of a Crime*, Steve Smith,  
4 September 19, 2023, Pacific Research Institute at  
5 <https://www.pacificresearch.org/sb-2-a-law-in-search-of-a-crime/>.) Burdening law  
6 enforcement officers with enforcing arbitrary restriction on where otherwise law  
7 abiding and licensed citizens can carry will impair their ability to stop actual public  
8 safety threats.

9 12. These rules simply make no sense from a law enforcement perspective.  
10 S.B. 2 has little impact on violent individuals who are likely to commit crimes with  
11 firearms, who will ignore the law and obviously do not bother getting CCW permits  
12 in the first place.

13 13. It's important to keep in mind that getting a CCW permit in California  
14 requires considerable effort and expense. Applicants subject themselves to a  
15 months-long process that includes considerable expense, a mandatory training  
16 course, a thorough background check conducted by the Department of Justice, and  
17 sometimes even a psychological exam in certain jurisdictions. People who are  
18 willing to go through this process before they exercise their right to carry are  
19 simply not likely to break the law; quite the opposite – they demonstrate a  
20 tremendous law-abiding predisposition. Criminals intent on committing gun  
21 violence are not going to obtain concealed carry permits, nor refrain from  
22 committing gun crimes in areas simply because its labeled a "sensitive place."

23 14. For these reasons, PORAC joins with several other law enforcement  
24 organizations in opposing S.B. 2's overly expansive "sensitive places" restrictions.  
25 For example, the California State Sheriffs' Association gave testimony to the State  
26 Senate saying in part "[t]he circumstance of a CCW holder committing a crime is  
27 exceedingly rare yet this bill imposes overreaching provisions that will likely be  
28 challenged in court, leaving uncertainty in issuance procedures. Instead of focusing

1 *on a law-abiding population, efforts should address preventing gun crimes*  
2 *committed by those who disobey the law and holding them accountable.”* PORAC  
3 entirely agrees.

4 15. There is no principled reason why all law-abiding citizens in  
5 California who get CCW permits should not be able to carry a firearm in most  
6 places permitted prior to the enactment of S.B. 2. PORAC believes in the  
7 legitimacy of the entire Constitution, and that means the right of the people to keep  
8 and bear arms under the Second Amendment. As peace officers, we have an  
9 obligation to safeguard people’s Constitutional rights. We urge this Court to grant  
10 Plaintiffs’ requested preliminary injunction.

11 16. On August 15, 2023, Attorney General Rob Bonta issued a press  
12 release stating, “[g]un violence is America’s disease, and it’s infecting our  
13 communities and traumatizing our families. Protecting public safety and preventing  
14 further devastation from these tragedies is my top priority.” (Attorney General  
15 Bonta Releases First-Ever Data Report by DOJ’s Office of Gun Violence  
16 Prevention, [https://oag.ca.gov/news/press-releases/attorney-general-bonta-releases-  
17 first-ever-data-report-doj%E2%80%99s-office-gun-violence?print=true](https://oag.ca.gov/news/press-releases/attorney-general-bonta-releases-first-ever-data-report-doj%E2%80%99s-office-gun-violence?print=true)) As a  
18 father and the President of PORAC, I agree the Attorney General’s concerns, but  
19 unfortunately this legislation will have no appreciable impact on gun violence.

20 17. I strongly believe that scarce law enforcement resources and personnel  
21 should be directed at suppressing violent crime and prosecuting those who use  
22 firearms to commit violent crimes to the fullest. Currently, progressive prosecutors  
23 in large urban counties, such as Los Angeles and Contra Costa, have adopted  
24 policies and directives effectively prohibiting enforcement of the Three Strikes law  
25 and Penal Code section 12022.53. These laws had dramatically reduced gun  
26 violence in California by ensuring that the most dangerous criminals who use  
27 firearms in the commission of specified crimes are off the streets and incarcerated  
28 for meaningful sentences.

1           18. Penal Code section 12022.53 applies to the most serious felonies, such  
2 as murder, rape, mayhem, kidnapping, robbery, carjacking, lewd acts on a child,  
3 and assault with a firearm on a peace officer or firefighter. In response to surging  
4 gun violence, the California Legislature enacted these sentence enhancements to  
5 disincentivize criminals from using guns while committing crimes, thereby  
6 reducing the public risk of death or great bodily injury. Persons convicted of  
7 enumerated felonies who use firearms in the commission of their crimes are subject  
8 to enhancements of 10 years for possession of the firearm, 20 years if they  
9 discharge the firearm, and 25 years to life if the discharge causes great bodily injury  
10 or death.

11           19. District Attorney Gascón issued Special Directive 20-08.02 on  
12 December 18, 2020, which states in part, “[t]he following sentence enhancements  
13 and allegations shall not be pursued in any case and shall be withdrawn in pending  
14 matters: ... Firearm allegations pursuant to Penal Code section 12022.53 shall not  
15 be filed, will not be used for sentencing, and will be dismissed or withdrawn from  
16 the charging document.”

17           20. District Attorney Price has adopted similar directives prohibiting  
18 Alameda County prosecutors from charging over 100 sentencing enhancements.  
19 (See, [https://www.alcoda.org/a-statement-from-alameda-county-district-attorney-  
20 pamela-y-price-on-special-directive-23-01/](https://www.alcoda.org/a-statement-from-alameda-county-district-attorney-pamela-y-price-on-special-directive-23-01/) .) Prices’ Special Directive 23-01,  
21 March 1, 2023, provides that “[f]irearm allegations pursuant to Penal Code section  
22 12022.53 shall not be filed and will not be used for sentencing, and will be  
23 dismissed or withdrawn from the charging document.”

24           21. Rather than encumber California’s already overburdened peace  
25 officers with enforcing feel-good legislation designating most public places as  
26 sensitive areas, public officials should actually enforce existing law which make it a  
27 crime for prohibited persons, such as felons, to possess any gun, anywhere.  
28 Enforcement of S.B. 2’s sensitive places definition will entangle law enforcement

1 officers in unending legal proceedings over the infringement of the Constitutional  
2 Rights of law-abiding citizens who completed safety training and passed through  
3 background checks as a prerequisite to obtaining a CCW permit.

4 22. The willful nonenforcement of existing gun laws targeting actual  
5 public safety threats has already led to dire consequences. Sadly, on June 14, 2022,  
6 two El Monte peace officers were murdered by a gang member who, by all  
7 accounts, should have been in prison after being arrested for unlawful possession of  
8 a firearm. Due to the failure of the District Attorney in Los Angeles to enforce  
9 prohibited persons laws these two officers were murdered.

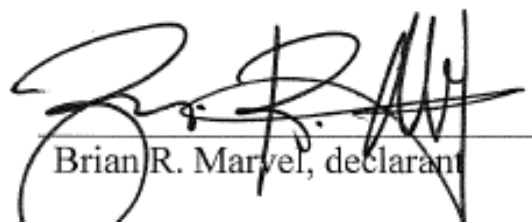
10 23. In fact, the Attorney General appears to have abdicated his  
11 constitutional and statutory authority to “step in and prosecute” these gun cases “to  
12 ensure that the laws of the state are enforced rather than to insulate criminal  
13 defendants from enforcement of the laws.” (*People v. Honig* (1996) 48 Cal.App.4th  
14 289, 354.) The California constitution requires the Attorney General “to see that the  
15 laws of the State are uniformly and adequately enforced.” (Cal. Const., art. V, §  
16 13.) Government Code section 12250 also authorizes the Attorney General to  
17 assume full responsibility for enforcing criminal laws within each county and  
18 permits the Governor to direct the Attorney General to do so in the public interest.

19 24. Invalidating this ineffectual, politically motivated legislation may  
20 force the State of California, the Attorney General, and local prosecutors to fulfil  
21 their public obligation to actually reduce and prevent gun violence, firearm injury,  
22 and related trauma by imposing serious consequences on those who use firearms to  
23 commit violent crimes.

24 25. PORAC supports reasonable and longstanding definitions of sensitive  
25 places where concealed carry is not permitted. PORAC also supports narrowly  
26 tailored training and proficiency requirements, and good moral character  
27 requirements that grant discretion to deny CCW violent or serious felony suspects  
28 and convicts. However, I believe this legislation extends far beyond the

1 permissible parameters under *Bruen* and will place PORAC members in the  
2 untenable position of enforcing an unconstitutional law or facing charges of  
3 insubordination.

4 I declare under penalty of perjury of the laws of State of California and the  
5 United States that the foregoing is true and correct. Executed within the United  
6 States on September 29, 2023.

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10 Brian R. Marvel, declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

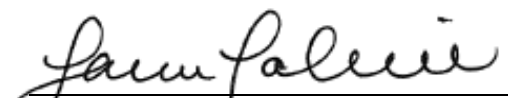
**DECLARATION OF BRIAN R. MARVEL, PRESIDENT OF PEACE OFFICERS RESEARCH ASSOCIATION OF CALIFORNIA IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
4 [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
5 Konstadinos T. Moros – SBN 306610  
6 [kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
7 MICHEL & ASSOCIATES, P.C.  
8 180 E. Ocean Blvd., Suite 200  
9 Long Beach, CA 90802  
10 Telephone: (562) 216-4444  
11 Facsimile: (562) 216-4445

12 Donald Kilmer-SBN 179986  
13 Law Offices of Donald Kilmer, APC  
14 14085 Silver Ridge Road  
15 Caldwell, Idaho 83607  
16 Telephone: (408) 264-8489  
17 Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF ERIC HANS IN  
SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY  
INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF ERIC HANS**

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1. I, Eric Hans, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of Riverside County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

4. I have a valid and current California concealed carry weapon (“CCW”) permit issued by the Riverside County Sheriff’s Department. Because I frequently travel out of state for my work, I also have a CCW permit issued by the State of Arizona, which is valid in that state as well as in Nevada.

5. I legally carry a concealed firearm with me on a daily basis, so that I may be armed and be able to defend myself and potentially others in the event of a life-threatening emergency situation. Prior to SB 2, I only didn’t carry my pistol when planning on going to one of the few places where carry was not permitted, such as a school or courthouse, or when I intended to have a drink with dinner.

6. Because SB 2 would prohibit me from carrying in many places where I am accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus my right to be armed for self-defense in public, will be outright eliminated in nearly all common contexts.

7. For example, under SB 2 I cannot carry in any establishment where alcohol is served, even if I do not intend to drink. That means I cannot conceal carry at most of the restaurants that I patronize on a regular basis, nor can I even carry in the parking area of such establishments. Under SB 2, I also cannot carry at the local mall that I often visit for shopping because it has restaurants that serve alcohol,



1 making the mall and its parking lot out of bounds.

2 8. Those two provisions of SB 2 are hardly the only two that will impact me. I  
3 can't carry while I stop at a gas station to fill up my car, because most gas stations  
4 sell lottery tickets inside, making them off-limits for carry. Under SB 2, carry is  
5 also prohibited at urgent care facilities which I have utilized in the past for medical  
6 attention and would use in the future. Carry is also prohibited at financial  
7 institutions such as my local bank that I frequent, and a variety of other places that I  
8 regularly visit.

9 9. SB 2 has a particular impact on me because the nature of my work involves  
10 constant travel around Southern California. I drive to unfamiliar areas I have never  
11 been to before, and would have no way of knowing if a particular area is off limits  
12 under SB 2 for a reason that is not obvious (e.g. perhaps an athletic facility or a  
13 restaurant that serves alcohol is tucked away in the other end of a strip mall I  
14 parked in making the parking lot a prohibited place, and I don't know that). Besides  
15 my local bank, my work also involves me depositing large sums of money at banks  
16 throughout the state, and when I do so, I'd like to be able to defend myself in case  
17 someone tries to harm me to steal that money. SB 2 takes the effective means of  
18 self-defense away from me.

19 10. Even when I am in my own neighborhood SB 2 harms me. I live directly  
20 across the street from a city park, and I frequently go for walks in that very park  
21 while carrying, and I want to continue to be able to do so. I also carry at church  
22 every Sunday. These places will now be off limits to me if I want to exercise my  
23 constitutional right to carry.

24 11. These are, of course, just a few examples of how SB 2 affects me, and as I  
25 go about my daily life, I am sure to discover several more. SB 2 has essentially  
26 destroyed my constitutional right to carry, as so few of the places I go to on a daily  
27 basis will permit carry, and I don't want to expose my firearm to theft by constantly  
28 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would

1 continue to carry in all of these places as I did before the law took effect.

2 I declare under penalty of perjury that the foregoing is true and correct.

3 Executed on September 28, 2023.



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5 Eric Hans, declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

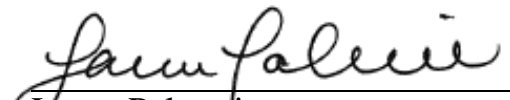
**DECLARATION OF ERIC HANS IN SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
4 [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
5 Konstadinos T. Moros – SBN 306610  
6 [kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
7 MICHEL & ASSOCIATES, P.C.  
8 180 E. Ocean Blvd., Suite 200  
9 Long Beach, CA 90802  
10 Telephone: (562) 216-4444  
11 Facsimile: (562) 216-4445

12 Donald Kilmer-SBN 179986  
13 Law Offices of Donald Kilmer, APC  
14 14085 Silver Ridge Road  
15 Caldwell, Idaho 83607  
16 Telephone: (408) 264-8489  
17 Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
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OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF ERICH PRATT  
IN SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY  
INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

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**DECLARATION OF ERICH PRATT**

1. I, Erich Pratt, am the Senior Vice President of Gun Owners of America, Inc. (“GOA”), and the Senior Vice President of Gun Owners Foundation (“GOF”); both are Plaintiffs in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. GOA is a California non-stock corporation and a not-for-profit membership organization with its principal place of business in Springfield, Virginia, exempt from federal income taxes under Section 501(c)(4) of the U.S. Internal Revenue Code. GOA was formed in 1976 to preserve and defend the Second Amendment rights of gun owners. GOA has more than 2 million members and supporters across the country, including residents within this judicial district and throughout the State of California.

3. GOF is a Virginia non-stock corporation and a not-for-profit legal defense and educational foundation with its principal place of business in Springfield, Virginia, exempt from federal income taxes under Section 501(c)(3) of the U.S. Internal Revenue Code. GOF was formed in 1983 and is supported by gun owners across the country, within this judicial district, and throughout the State of California who will be irreparably harmed by the implementation and enforcement of SB 2.

4. Many GOA and GOF members and supporters in California have valid and current concealed carry weapon (“CCW”) permits, which enable them to lawfully carry a concealed firearm in public so that they can defend themselves (and potentially others) in the event of a life-threatening emergency situation.

5. Because SB 2 would prohibit GOA and GOF members and supporters in California from carrying a concealed firearm in many places where they often carry and are accustomed to carrying such firearms, the utility of their CCWs, and thus their right to be armed for self-defense in public, will be severely infringed,

1 curtailed, and outright eliminated in many common locations.

2 6. For example, under SB 2, GOA and GOF members and supporters cannot  
3 carry concealed firearms where alcohol is served for consumption on the premises.  
4 Accordingly, they cannot conceal carry at restaurants they patronize on a regular  
5 basis, nor in the parking area outside such establishments.

6 7. SB 2 also prohibits GOA and GOF members and supporters in California  
7 from carrying concealed firearms in parks and public lands they often frequent. In  
8 addition, SB 2 prohibits carry at urgent care facilities which GOA and GOF  
9 members and supporters have used in the past for rapid medical attention and would  
10 use in the future. And, under SB 2, carry is prohibited at financial institutions such  
11 as banks that GOA and GOF members and supporters frequent.

12 8. Perhaps most significantly, under SB 2, concealed carry is prohibited at any  
13 privately owned commercial establishment that does not affirmatively display  
14 notice that the establishment tolerates or supports concealed carry on the premises.  
15 There are many local businesses that GOA and GOF members and supporters  
16 frequent that almost certainly will not bother to post such signs that are politically  
17 unpopular in much of California, forcing persons either to not carry there or stop  
18 patronizing these locations entirely.

19 9. These are just a few examples of how SB 2 harms the members and  
20 supporters of GOA and GOF. SB 2 renders most of California off-limits and utterly  
21 un navigable to GOA and GOF members and supporters attempting to exercise their  
22 enumerated constitutional right to “bear arms” as they go about their daily lives.

23 10. In other words, GOA and GOF’s members and supporters are representative  
24 of those affected by SB 2’s unconstitutional mandates, which has a ubiquitous and  
25 negative effect not only on gun owners across the state but also on the general  
26 public, by depriving the public of a responsible, armed citizenry, which contributes  
27 to “the security of a free state.”

28 11. Protection of these rights and interests advanced in this litigation is germane

1 to GOA and GOF’s respective missions, which includes efforts to preserve and  
2 protect the Second Amendment and the rights of Americans to keep and bear arms.  
3 GOA and GOF routinely litigate cases throughout the country on behalf of their  
4 members and supporters, and GOA and GOF are capable of fully and faithfully  
5 representing the interests of their members and supporters without participation by  
6 each such person.

7 12.Suffice it to say, GOA and GOF believe that SB 2 is abhorrent and  
8 incompatible with the general right of Americans, including Californians who are  
9 GOA and GOF members and supporters, to carry a firearm in public for self-  
10 defense.

11 I declare under penalty of perjury that the foregoing is true and correct.  
12 Executed within the United States on September 29, 2023.

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15 Erich Pratt, declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

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Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:


**DECLARATION OF ERICH PRATT IN SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin



1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
4 [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
5 Konstadinos T. Moros – SBN 306610  
6 [kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
7 MICHEL & ASSOCIATES, P.C.  
8 180 E. Ocean Blvd., Suite 200  
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10 Telephone: (562) 216-4444  
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17 Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
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DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF GARY  
BRENNAN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF GARY BRENNAN**

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1. I, Gary Brennan, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of San Diego County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am an approved CCW instructor for the San Diego County Sheriff’s Department. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

4. I have a valid and current California concealed carry weapon (“CCW”) permit issued by the San Diego County Sheriff’s Department.

5. I legally carry a concealed firearm with me on a daily basis, so that I may be armed and be able to defend myself and potentially others in the event of a life-threatening emergency situation. Prior to SB 2, I only didn’t carry my pistol when planning on going to one of the few places where carry was not permitted, such as a school or courthouse, or when I intended to have a drink with dinner.

6. Because SB 2 would prohibit me from carrying in many places where I am accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus my right to be armed for self-defense in public, will be outright eliminated in nearly all common contexts.

7. For example, under SB 2 I cannot carry in any establishment where alcohol is served, even if I do not intend to drink. That means I cannot conceal carry at most of the restaurants that I patronize on a regular basis, nor can I even carry in the parking area of such establishments.

8. Those two provisions of SB 2 are hardly the only two that will impact me. I

1 can't carry while I stop at a gas station to fill up my car, because most gas stations  
2 sell lottery tickets inside, making them off-limits for carry. Under SB 2, carry is  
3 also prohibited at urgent care facilities which I have utilized in the past for medical  
4 attention and would use in the future. Carry is also prohibited at financial  
5 institutions such as my local bank that I frequent, and a variety of other places that I  
6 regularly visit.

7 9. I am the President of the San Diego County Wildlife Federation, a position  
8 that involves frequent hikes through public lands. While I understand that SB 2 has  
9 an exception for lands available for hunting or shooting ranges, much of the land I  
10 hike and travel through, whether in my roles as President of the Federation or just  
11 recreationally, does not qualify for this exception. As I am sometimes alone in the  
12 wilderness, or with just a small amount of people, the need for effective self-  
13 defense against criminal attack or an attack by a wild animal is a major concern. SB  
14 2 has taken that away from me.

15 10. My role as President of the Federation also sometimes involves me  
16 depositing large sums of money at banks besides just my local bank. When I do so,  
17 I'd like to be able to defend myself in case someone tries to harm me to steal that  
18 money. SB 2 does not allow me to do so.

19 11. These are, of course, just a few examples of how SB 2 affects me, and as I  
20 go about my daily life, I am sure to discover several more. SB 2 has essentially  
21 destroyed my constitutional right to carry, as so few of the places I go to on a daily  
22 basis will permit carry, and I don't want to expose my firearm to theft by constantly  
23 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would  
24 continue to carry in all of these places as I did before the law took effect.

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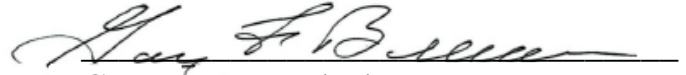
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 29, 2023.

  
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Gary Brennan, declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

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I am not a party to the above-entitled action. I have caused service of:

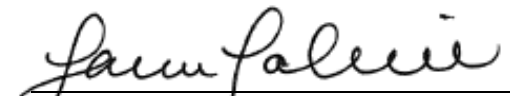
**DECLARATION OF GARY BRENNAN IN SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
4 [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
5 Konstadinos T. Moros – SBN 306610  
6 [kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
7 MICHEL & ASSOCIATES, P.C.  
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18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
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21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
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AMENDMENT FOUNDATION; GUN  
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OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF ISABELLE R.  
BARRETTO IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF ISABELLE R. BARRETTO**

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1. I, Isabelle R. Barretto, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of Ventura County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner.

4. I have a valid and current California concealed carry weapon (“CCW”) permit issued by the Ventura County Sheriff’s Department, as does my husband Oscar who is also a Plaintiff in this matter.

5. I legally carry a concealed firearm with me on a daily basis, so that I may be armed and be able to defend myself and potentially others in the event of a life-threatening emergency situation. Prior to SB 2, I only didn’t carry my pistol when planning on going to one of the few places where carry was not permitted, such as a school or courthouse.

6. Because SB 2 would prohibit me from carrying in many places where I am accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus my right to be armed for self-defense in public, will be outright eliminated in nearly all common contexts.

7. For example, under SB 2 I cannot carry in any establishment where alcohol is served, even though my husband and I do not drink. That means I cannot conceal carry at most of the restaurants that I patronize on a regular basis, nor can I even carry in the parking area of such establishments.

8. Those two provisions of SB 2 are hardly the only two that will impact me. I can’t carry while I stop at a gas station to fill up my car, because most gas stations sell lottery tickets inside, making them off limits for carry. Under SB 2, carry is

1 also prohibited at financial institutions such as my local bank that I frequent, and a  
2 variety of other places that I regularly visit. The parks my husband and I often go to  
3 for family barbeques are now unavailable to us if we are exercising our right to  
4 carry.

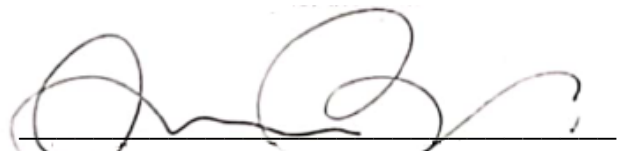
5 9. A major reason my husband and I maintain carry permits and carry regularly  
6 is due to his former career as a Bail Fugitive Recovery Agent. He constantly fears  
7 that he may run into someone from that old career who may wish to do him harm as  
8 retribution, and I share that fear and worry for our safety. SB 2 massively restricting  
9 where our CCW permits are effective will put us in real danger.

10 10. My husband and I also frequently attend church and teach Sunday School.  
11 Prior to SB 2, we carried to church in case of a violent attack against people of faith  
12 like us. Now, we will no longer be able to do so. Even if our church was willing to  
13 post signs allowing us to carry, the church's parking lot being on government-run  
14 airport grounds restricts it anyway under SB 2.

15 11. These are, of course, just a few examples of how SB 2 affects me, and as I  
16 go about my daily life, I am sure to discover several more. SB 2 has essentially  
17 destroyed my constitutional right to carry, as so few of the places I go to on a daily  
18 basis will permit carry, and I don't want to expose my firearm to theft by constantly  
19 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would  
20 continue to carry in all of these places as I did before the law took effect.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed on September 29, 2023.

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25 Isabelle R. Barretto, declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

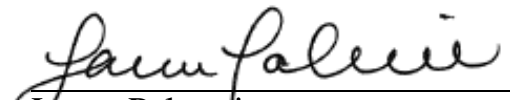
**DECLARATION OF ISABELLE R. BARRETTO IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
4 [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
5 Konstadinos T. Moros – SBN 306610  
6 [kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
7 MICHEL & ASSOCIATES, P.C.  
8 180 E. Ocean Blvd., Suite 200  
9 Long Beach, CA 90802  
10 Telephone: (562) 216-4444  
11 Facsimile: (562) 216-4445

12 Donald Kilmer-SBN 179986  
13 Law Offices of Donald Kilmer, APC  
14 14085 Silver Ridge Road  
15 Caldwell, Idaho 83607  
16 Telephone: (408) 264-8489  
17 Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF JOSE FLORES  
IN SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY  
INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF JOSE FLORES**

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1. I, Jose Flores, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of Fresno County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

4. I have recently been approved for a California concealed carry weapon (“CCW”) permit with the Fresno County Sheriff’s Department and expect to receive it soon in the mail.

5. I am a first-generation Mexican American small business owner and advocate for our Second Amendment rights. I come from a family of entrepreneurs who own multiple businesses in Fresno. During my high school years, in January 2012, a tragic incident occurred right outside our family's small restaurant. Witnessing a brutal murder where a man was mercilessly stabbed multiple times deeply impacted me. It was a transformative experience that reinforced my unwavering belief in the importance of the right to self-defense and the Second Amendment. Since I became eligible to purchase a firearm, I have been an avid gun owner, with a genuine interest in protecting and preserving our constitutional right to keep and bear arms.

6. While SB 2 will obviously limit me from carrying nearly everywhere once I have my permit, the law affects me in a slightly more unique way as well. I am the owner and operator of Flores Flooring Solutions, a small business in Fresno which includes a showroom open to the public. Plenty of people in Fresno have CCW permits, and I have no issue with such individuals carrying in my showroom.

1 Citizens with CCW permits aren't the ones I worry about when it comes to crime,  
2 as I know that criminals don't bother going through the legal process to get a  
3 permit. If anything, those with CCW permits make me feel safer, and I want to  
4 continue to treat them as welcome customers in my business.


5 7. However, given my background as a business owner, I understand the  
6 implications of having signage that indicates concealed carry is permitted. It forces  
7 my business to publicly take a position on a contentious issue and may needlessly  
8 alienate customers who oppose gun rights. Further, I don't want to be a part of  
9 legitimizing California's unconstitutional scheme by agreeing to put up such a sign  
10 if I want to support the Second Amendment. Americans generally have the right to  
11 carry firearms and shouldn't need to have permission to do so at every private  
12 business they visit. If a business like mine wants to make it known that we prohibit  
13 carry, it can put up a sign saying so, just as businesses have traditionally done for  
14 all sorts of things they want to declare not allowed on their property.

15 8. Moreover, burglary and theft are a frequent concern for any business in  
16 California, and I fear putting up a "guns allowed" sign may make my business an  
17 even more desirable target for thieves, because they may believe I store firearms on  
18 the premises.

19 9. For all those reasons, and for my own right to carry once I get my CCW  
20 permit, I sincerely hope this court enjoins SB 2.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed on September 29, 2023.

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25 Jose Flores  
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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

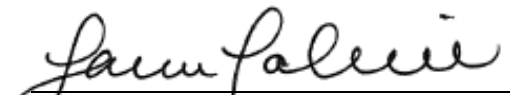
**DECLARATION OF JOSE FLORES IN SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
4 [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
5 Konstadinos T. Moros – SBN 306610  
6 [kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
7 MICHEL & ASSOCIATES, P.C.  
8 180 E. Ocean Blvd., Suite 200  
9 Long Beach, CA 90802  
10 Telephone: (562) 216-4444  
11 Facsimile: (562) 216-4445

12 Donald Kilmer-SBN 179986  
13 Law Offices of Donald Kilmer, APC  
14 14085 Silver Ridge Road  
15 Caldwell, Idaho 83607  
16 Telephone: (408) 264-8489  
17 Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF MORIS  
DAVIDOVITZ IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF MORIS DAVIDOVITZ**

I, Moris Davidovitz, declare as follows:

1. I am a resident of Marin County, California, and make this Declaration stating my personal knowledge of the following set forth herein.

2. I am an adult, age 71, who is not prohibited from owning firearms under the laws of the United States of America or the State of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner. I have received more than sixteen hours of instruction in the safe use of firearms including handguns and the laws of California regarding the possession and use of firearms including handguns. I have many hours of live fire practice with firearms including handguns. The instruction including live fire instruction I have received includes concealed carry defensive use of handguns.

3. I am an attorney licensed to practice in California state courts since December 1976. I also have been admitted to practice in other courts, including the United States District Court for the Central District of California, the United States Ninth Circuit Court of Appeal, and the United States Supreme Court. I am rated by Martindale-Hubbell “Judicial Preeminent AV”. I have volunteered to courts, as an appointed mediator for the Sonoma Superior Court and for the Sacramento Superior Court, and as a pro tem settlement judge for the San Francisco Superior Court. I currently practice law in two law firms: as an employee in the Cooper & Scully, P.C. office located in San Francisco, California and as the owner of Davidovitz + Bennett located in Marin County, California.

4. I have a valid and current License to Carry Concealed Weapon Within the State of California (“CCW”), for three handguns, issued by the Marin County Sheriff. The “Reason For License” stated on that CCW is “protection”. As I had communicated to the Marin County Sheriff during the interview process for my application for a CCW, my primary reason for obtaining a CCW was for the

1 protection of myself, my spouse of some 47 years who is age 70, and my minor  
2 grandchildren who reside nearby ages 3 through 10.

3 5. SB 2 would prohibit me from carrying a concealed handgun in many  
4 places where I desire to carry in order to protect and defend myself, my spouse, and  
5 my minor grandchildren in the event of an imminent threat to life or serious bodily  
6 harm, as detailed below. As such, SB 2 would effectively and practically strip away  
7 that protection and defense.

8 6. My spouse and I have reduced our work schedules to permit us more  
9 time for activities together, with friends, and with our grandchildren. We  
10 increasingly enjoy such activities as going to restaurants, movie theatres, the San  
11 Francisco ballet, the San Francisco symphony, and more throughout urban areas  
12 such as in San Francisco, Oakland, and Berkeley. Participating in such activities  
13 involves our driving to the locations, parking our car sometimes in a parking  
14 garage, and walking in streets to and from the activity.

15 7. SB 2 would prohibit me from carrying a concealed handgun during  
16 such events in order to protect and defend my spouse. Absent a sign granting  
17 permission, I would not be able to carry a concealed handgun into a parking garage,  
18 moreover I do not see how I could practically determine in advance whether a  
19 parking garage was posting a sign with permission. Also, I could not carry a  
20 concealed handgun while walking the streets to and from a restaurant because  
21 almost every restaurant I am familiar with serves alcoholic beverages of some kind,  
22 so that SB 2 would prohibit me from carrying a concealed handgun into a  
23 restaurant. Also, I could not carry a concealed handgun while walking the streets to  
24 and from the San Francisco ballet or the San Francisco symphony because from my  
25 personal experience there those venues serve alcoholic beverages during  
26 intermission, so that SB 2 would prohibit me from carrying a concealed handgun  
27 into those venues. I accompany my spouse shopping in a mall area and  
28 supermarkets which have multiple points of entry; I cannot see how I could



1 practically examine each entry point for the presence of a sign in some undefined  
2 location granting permission for entry with firearms before entering the mall or  
3 supermarket with my spouse, which would tend to dissuade me from carrying a  
4 concealed handgun to any mall or supermarket. I would no longer feel safe going to  
5 the Orpheum Theatre in San Francisco without the ability to carry a concealed  
6 handgun because attending there means parking in and walking in a section of San  
7 Francisco known as the “Tenderloin”, which is an area exhibiting open air drug use  
8 and aggressive conduct in the public streets. Also, in my experience movie theatres  
9 are more and more serving alcoholic beverages to encourage attendance (for  
10 example, the Rafael Film Center in San Rafael, the AMC Kabuki in San Francisco,  
11 the Castro Theatre in San Francisco), so that SB 2 would prohibit me from  
12 protecting my spouse by carrying a concealed handgun into or walking in the streets  
13 to and from such movie theatres, because SB 2 would prohibit me from carrying a  
14 concealed handgun in such venues.

15 8. I often (usually each week) provide childcare to my four  
16 grandchildren, ages 3 to 10, who reside close to me. They are in households where  
17 both parents work, and so their parents rely on me and my spouse to provide  
18 childcare including transportation for each of the grandchildren. I take very  
19 seriously my responsibility to protect my grandchildren (and other minor children  
20 who may from time to time be in my care): I have current certification by the  
21 American Red Cross in Adult and Pediatric First Aid/CPR/AED, and by the  
22 American Heart Association in Basic Life Support. In my car I carry a first aid kit  
23 which includes equipment for trauma care. My mobile phone has applications for  
24 poison control, first aid, and locating hospital emergency rooms.

25 9. The childcare I provide includes transportation, such as to athletic  
26 events (soccer practice and games for the 10 year old grandson), parks with  
27 playgrounds for all of the children, toy stores and book stores for certain  
28 grandchildren, and therapy sessions for certain grandchildren who have special

1 needs. Sometimes the grandchildren want to stop into an ice cream store or get a  
2 soft drink from a convenience store. Participating in such activities involves  
3 driving to the locations, parking my car sometimes in a parking garage, and walking  
4 in streets to and from the activity. SB 2 would prohibit me from carrying a  
5 concealed handgun during such events in order to protect and defend my  
6 grandchildren. Absent a sign granting permission, I would not be able to carry a  
7 concealed handgun into a parking garage, moreover I do not see how I could  
8 practically determine in advance whether a parking garage was posting a sign with  
9 permission. SB 2 would prohibit me from carrying a handgun while walking with  
10 my grandchildren to and from a playground, an athletic event, a toy store, a book  
11 store, an ice cream store, a therapy facility, a shopping mall, and certainly a  
12 convenience store as they sell alcoholic beverages. As happens with young  
13 children, on occasion while driving them a grandchild urgently needs to use a  
14 restroom, which means quickly entering a restaurant or a convenience store at a gas  
15 station; SB 2 would prohibit me from such entry with a concealed handgun as those  
16 locations serve or sell alcoholic beverages, so at very best SB 2 would require that  
17 in the presence of and observation by my grandchildren I unholster a holstered  
18 concealed handgun and then lock the handgun in the rear of my car (and then, on  
19 return to my car, reverse the process, again in the presence of and observation by  
20 my grandchildren). I do not wish to expose my young grandchildren to the  
21 handling of handguns and to respond to their inevitable curiosity about handgun  
22 handling, so the restrictions resulting from SB 2 would tend to dissuade me from  
23 the exercise of my Constitutional right to bear arms for my defense and the defense  
24 of my grandchildren.

25 10. SB 2 also would restrict me from the exercise of my Constitutional  
26 right to bear arms for my own defense, in connection with my travel as part of my  
27 providing services as an attorney. To access my law office at the law firm Cooper  
28 & Scully, P.C. in San Francisco I drive from my home in Marin County to San

1 Francisco and park my car in a certain parking garage where I have received a  
2 security clearance to park, and then walk the public streets to the law office. That  
3 garage does not post permission to enter with firearms, so SB 2 would prohibit me  
4 from carrying a concealed handgun in that garage and so I would not have access to  
5 a concealed handgun to walk the public streets to and from my law office in San  
6 Francisco. Further, as part of my law practice with the law firm of Davidovitz +  
7 Bennett, I provide legal assistance without a fee charge to persons, often in San  
8 Francisco, who have modest legal problems who are not in a position to retain an  
9 attorney for assistance with such legal problems. Davidovitz + Bennett does not  
10 have an office in San Francisco, so that in order to meet with such clients I often  
11 must meet the person in a restaurant in San Francisco convenient to their location.  
12 SB 2 would prohibit me from carrying a concealed handgun while walking the  
13 public streets to or from such a location, or in such a location because it serves  
14 alcoholic beverages.

15 11. I feel that SB 2 is a pernicious restriction on the free practice of my  
16 Jewish religious faith, to the extent that I believe the free exercise of religious faith  
17 includes the exercise of the Constitutional right to protect oneself, one’s family, and  
18 one’s parishioners in the practice of one’s religious faith. I am aware of Mr. Doug  
19 Imhoff, the husband of Vice-President Harris, at a roundtable on antisemitism at the  
20 White House in December 2022, warning of an “epidemic of hate facing our  
21 country.” I am aware of a May 2023 report by the Anti-Defamation League of an  
22 audit showing in 2022 a 36% increase over 2021 of reported incidents of  
23 antisemitic assault, harassment and vandalism in the United States, and which is the  
24 largest number of incidents against Jews in the U.S. since the organization began its  
25 assessments in 1979. I am aware of the recent deaths and injuries by a gunman at  
26 the Tree of Life synagogue in Pittsburg, and reports of law enforcement preventing  
27 serious threats against Jewish communities. I therefore have concern over the safety  
28 of myself, my family, and my parishioners attending religious services in my

1 community synagogue Rodef Shalom, especially during the Jewish High Holy  
2 Days where hundreds congregate in one location in observance. That synagogue  
3 does not post a sign granting permission to enter with firearms, moreover during the  
4 Jewish High Holy Days because of hundreds of congregants the synagogue uses the  
5 Marin County Civic Center for observance. The Civic Center may qualify as a  
6 government building or a commercial building, which I understand would be a  
7 prohibited area under SB 2. Thus, SB 2 would prohibit my carrying a concealed  
8 handgun for protection in my community synagogue or for religious services held  
9 at the Civic Center, including the ability to carry a concealed handgun while  
10 walking to or from religious services.

11 12. Until recently when I heard about the passage of SB 2, I was not  
12 involved in any associations promoting Second Amendment rights or “gun rights”,  
13 nor active in those issues. With the passage of SB 2, however, I want a recognized  
14 association to advocate for me against what I feel to be the unconstitutional  
15 restrictions imposed by SB 2 on me in the protection of myself, my family, and  
16 others, so I have become a member of the California Rifle and Pistol Association, a  
17 Plaintiff in the action herein. I support Plaintiff California Rifle and Pistol  
18 Association advocating on my behalf in this action.

19 13. To the limited extent I am able to carry a concealed handgun anymore  
20 under the restrictions imposed on me by SB 2, it will be necessary for me either to  
21 subject my handgun to theft by more frequently leaving it in my vehicle (a  
22 Chevrolet Bolt, with a hatchback not including a locked trunk) while parked away  
23 from my home or else be dissuaded from even bringing my handgun. As a  
24 responsible, law-abiding person, this increased risk of theft of my handgun because  
25 of the effect of SB 2 I feel to be a chilling effect on what limited concealed carrying  
26 ability may be left to me from the application of SB 2 restrictions.

27 I declare under penalty of perjury under the laws of the State of California  
28 that the foregoing is true and correct and was executed on September 29, 2023, in

1 Greenbrae, California.

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Moris Davidovitz, declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

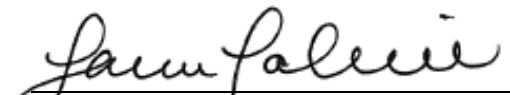
**DECLARATION OF MORIS DAVIDOVITZ IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
4 [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
5 Konstadinos T. Moros – SBN 306610  
6 [kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
7 MICHEL & ASSOCIATES, P.C.  
8 180 E. Ocean Blvd., Suite 200  
9 Long Beach, CA 90802  
10 Telephone: (562) 216-4444  
11 Facsimile: (562) 216-4445

12 Donald Kilmer-SBN 179986  
13 Law Offices of Donald Kilmer, APC  
14 14085 Silver Ridge Road  
15 Caldwell, Idaho 83607  
16 Telephone: (408) 264-8489  
17 Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF OSCAR A.  
BARRETTO, JR. IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

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**DECLARATION OF OSCAR A. BARRETTO, JR.**

1. I, Oscar A. Barretto, Jr., am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of Ventura County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner.

4. I have a valid and current California concealed carry weapon (“CCW”) permit issued by the Ventura County Sheriff’s Department, as does my wife Isabelle who is also a Plaintiff in this matter.

5. I legally carry a concealed firearm with me on a daily basis, so that I may be armed and be able to defend myself and potentially others in the event of a life-threatening emergency situation. Prior to SB 2, I only didn’t carry my pistol when planning on going to one of the few places where carry was not permitted, such as a school or courthouse.

6. Because SB 2 would prohibit me from carrying in many places where I am accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus my right to be armed for self-defense in public, will be outright eliminated in nearly all common contexts.

7. For example, under SB 2 I cannot carry in any establishment where alcohol is served, even though my wife and I do not drink. That means I cannot conceal carry at most of the restaurants that I patronize on a regular basis, nor can I even carry in the parking area of such establishments.

8. Those two provisions of SB 2 are hardly the only two that will impact me. I can’t carry while I stop at a gas station to fill up my car, because most gas stations sell lottery tickets inside, making them off limits for carry. Under SB 2, carry is



1 also prohibited at financial institutions such as my local bank that I frequent, and a  
2 variety of other places that I regularly visit. The parks my wife and I often go to for  
3 family barbeques are now unavailable to us if we are exercising our right to carry.

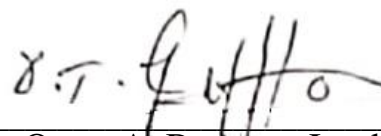
4 9. I have specific personal safety concerns thanks to my former career. I am a  
5 retired California Bail Fugitive Recovery Agent (colloquially known as a “bounty  
6 hunter”), a role which saw me deal with many unsavory individuals who likely still  
7 harbor ill-will towards me. Indeed, that former role is one of the major reasons I  
8 decided that my wife and I should get CCW permits. Now, SB 2 will make those  
9 permits mostly useless and, I fear, has put our lives in danger.

10 10. I also require regular visits for medical attention given my need for physical  
11 therapy and to treat my diabetes. On these visits, I have always carried, but SB 2  
12 makes medical facilities prohibited places.

13 11. My wife and I also frequently attend church and teach Sunday School. Prior  
14 to SB 2, we carried to church in case of a violent attack against people of faith like  
15 us. Now, we can no longer do so. Even if our church was willing to post signs  
16 allowing us to carry, the church’s parking lot being on government-run airport  
17 grounds restricts it anyway under SB 2.

18 12. These are, of course, just a few examples of how SB 2 affects me, and as I  
19 go about my daily life, I am sure to discover several more. SB 2 has essentially  
20 destroyed my constitutional right to carry, as so few of the places I go to on a daily  
21 basis will permit carry, and I don’t want to expose my firearm to theft by constantly  
22 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would  
23 continue to carry in all of these places as I did before the law took effect.

24 I declare under penalty of perjury that the foregoing is true and correct.  
25 Executed on September 29, 2023.

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27 \_\_\_\_\_  
28 Oscar A. Barretto, Jr., declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

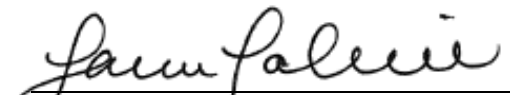
**DECLARATION OF OSCAR A. BARRETTO, JR. IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
cmichel@michellawyers.com  
2 Sean A. Brady – SBN 262007  
sbrady@michellawyers.com  
3 Konstadinos T. Moros – SBN 306610  
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9 Telephone: (408) 264-8489  
Email: Don@DKLawOffice.com

10 Attorneys for Plaintiffs

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **SOUTHERN DIVISION**

14 RENO MAY, an individual;  
15 ANTHONY MIRANDA, an individual;  
ERIC HANS, an individual; GARY  
16 BRENNAN, an individual; OSCAR A.  
BARRETTO, JR., an individual;  
17 ISABELLE R. BARRETTO, an  
individual; BARRY BAHRAMI, an  
18 individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
19 individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
20 DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
21 OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
22 OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
23 CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,,  
24

Plaintiffs,

v.

26 ROBERT BONTA, in his official  
capacity as Attorney General of the  
27 State of California, and DOES 1-10,  
28

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF PETE  
STEPHENSON IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF PETE STEPHENSON**

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1. I, Pete Stephenson, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of Alameda County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

4. I have a valid and current California concealed carry weapon (“CCW”) permit issued by the Alameda County Sheriff’s Department.

5. I am a married father of two children that lives and works in the City of Livermore. I was born and raised in California and am a veteran who was honorably discharged with the E-4 rank in the mid-2000s. I applied for an Alameda County CCW permit on the night of the *Bruen* ruling and was issued the permit earlier this year. I regularly carry for self-defense of myself and my family wherever it is lawful to do so.

6. While I live in Livermore, I am a frequent visitor to San Francisco with my family. We visit Fisherman's Wharf, museums, parks, and other popular destinations. While there, I and my family will visit banks (e.g. to withdraw cash from an ATM), dine in restaurants, go shopping, and otherwise enter typical privately-owned businesses that are open to the public like shops, galleries, and so forth, just as we do back home in Livermore.

7. On these regular trips to San Francisco, the easiest way to travel is often by BART from the Dublin/Pleasanton station near Livermore to stations in San Francisco and back. SB 2 will make this impossible if I want to exercise my right to carry, because it bans carry on public transportation.

1 8. Prior to SB 2, I only didn't carry my pistol when planning on going to one of  
2 the few places where carry was not permitted, such as a school or courthouse, or  
3 when I intended to have a drink with dinner.

4 9. Because SB 2 will prohibit me from carrying in many places where I am  
5 accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus  
6 my right to be armed for self-defense in public, will be outright eliminated in nearly  
7 all common contexts. All of the places I listed above will be off-limits for carry  
8 now, with the exception perhaps of any businesses that choose to put up a sign  
9 affirmatively allowing those with CCW permits to carry within them (which will  
10 certainly not be common here in a region quite hostile to gun rights).

11 10. SB 2 will essentially destroy my constitutional right to carry, as so few of  
12 the places I go to on a daily basis will permit carry, and I don't want to expose my  
13 firearm to theft by constantly leaving it in my vehicle. And when I am using public  
14 transportation, there is no vehicle to store it in anyway. But for SB 2 and my fear of  
15 criminal prosecution, I would continue to carry in all of these places as I did before  
16 the law took effect.

17 I declare under penalty of perjury that the foregoing is true and correct.  
18 Executed on September 29, 2023.



21 Pete Stephenson  
22 Declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

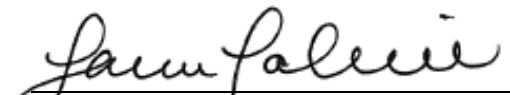
**DECLARATION OF PETE STEPHENSON IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
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17 Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
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DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF RICHARD  
MINNICH IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF RICHARD MINNICH**

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1. I, Richard Minnich, am the Treasurer of the California Rifle & Pistol Association, Incorporated (CRPA), a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. CRPA is a non-profit membership organization classified under section 501(c)(4) of the Internal Revenue Code and incorporated under the laws of California, with its headquarters in Fullerton, California.

3. Founded in 1875, CRPA seeks to defend the Second Amendment and advance laws that protect the rights of individual citizens. CRPA works to preserve the constitutional and statutory rights of gun ownership, including the rights to self-defense, the right to hunt, and the right to keep and bear arms. CRPA is also dedicated to promoting the shooting sports, providing education, training, and organized competition for adult and junior shooters. CRPA’s members include law enforcement officers, prosecutors, professionals, firearm experts, and members of the public.

4. CRPA’s membership includes thousands of individuals who possess current and valid California issued CCW licenses to carry a concealed firearm in public.

5. Because SB 2 would prohibit CRPA’s members from carrying in many places where they often carry and are accustomed to concealed carrying a firearm, the utility of their CCWs, and thus their right to be armed for self-defense in public, will be severely curtailed and outright eliminated in many common locations.

6. For example, under SB 2 they cannot carry where alcohol for consumption on the premises is served. That means they cannot conceal carry at restaurants they patronize on a regular basis, nor carry in the parking area outside such an establishment.

7. SB 2 also prohibits CRPA members in California from concealed carrying in parks and public lands they often frequent. And under SB 2, carry is prohibited at

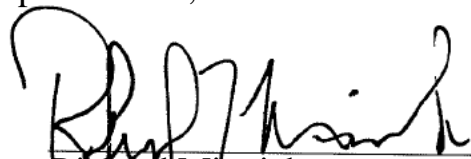


1 urgent care facilities which CRPA members have used in the past for rapid medical  
2 attention and would use in the future. Under SB 2, carry is prohibited at financial  
3 institutions such as banks that CRPA members frequent.

4 8. Perhaps most significantly, under SB 2, concealed carry is prohibited at any  
5 privately owned commercial establishment that does not affirmatively display  
6 notice that the establishment tolerates concealed carry at the establishment's  
7 premises. There are many local businesses that CRPA members frequent that will  
8 likely not post such signs, forcing them to either not carry there or stop patronizing  
9 them.

10 9. These are just a few examples of how SB 2 harms our members. Suffice it to  
11 say, CRPA believes that SB 2 is abhorrent and incompatible with the general right  
12 of Americans, including Californians who are CRPA members, to carry a firearm in  
13 public for self-defense.

14 I declare under penalty of perjury that the foregoing is true and correct.  
15 Executed within in the United States on September 29, 2023.

16   
17  
18 Richard Minnich  
19 Declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

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Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:


**DECLARATION OF RICHARD MINNICH IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
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18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
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24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
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OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF RENO MAY IN  
SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY  
INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF RENO MAY**

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1. I, Reno May, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of Sonoma County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

4. I have a valid and current California concealed carry weapon (“CCW”) permit issued by the Sonoma County Sheriff’s Department.

5. I legally carry a concealed firearm with me on a daily basis, so that I may be armed and be able to defend myself, my wife, and potentially others in the event of a life-threatening emergency situation. Prior to SB 2, I only didn’t carry my pistol when planning on going to one of the few places where carry was not permitted, such as a school or courthouse, or when I intended to have a drink with dinner.

6. Because SB 2 will prohibit me from carrying in many places where I am accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus my right to be armed for self-defense in public, will be outright eliminated in nearly all common contexts.

7. For example, under SB 2 I cannot carry in any establishment where alcohol is served, even if I do not intend to drink. That means I cannot conceal carry at most of the restaurants that I patronize on a regular basis, nor can I even carry in the parking area of such an establishment. Under SB 2, I also cannot carry at the Santa Rosa mall that I often visit because there is a fitness center there as well as restaurants that serve alcohol, making the mall and its parking lot out of bounds under SB 2.

1       8. Those two provisions of SB 2 are hardly the only two that will impact me. I  
2 can't carry while I stop at a gas station to fill up my car, because most gas stations  
3 sell lottery tickets inside, making them off-limits for carry. Under SB 2, carry is  
4 also prohibited at urgent care facilities which I have utilized in the past for medical  
5 attention and would use in the future. Carry is also prohibited at financial  
6 institutions such as my local bank that I frequent, and a variety of other places that I  
7 regularly visit.

8       9. Perhaps most significantly, under SB 2, concealed carry is prohibited at any  
9 privately owned commercial establishment that does not affirmatively display  
10 notice that the establishment tolerates concealed carry at the establishment's  
11 premises. There are many local businesses that I frequent that will likely not post  
12 such signs, forcing me to either not carry there or stop patronizing them. Even the  
13 ones that are willing to post such signs may be off limits for other reasons. For  
14 example, Sportsmans Arms, my local gun dealer, shares a parking lot with several  
15 other businesses, including an establishment that serves alcohol. Because of that, I  
16 cannot carry so much as in the parking lot that is necessary to cross to get to  
17 Sportsmans Arms, even if Sportsmans Arms puts up a sign permitting carry.

18       10. Under SB 2, I can no longer continue to carry at the gym where I regularly  
19 work out. Even if that gym posts a sign allowing legal carry, it likely qualifies as an  
20 "athletic facility" under SB 2.

21       11. SB 2 also affects my carry rights when I travel. My wife and I visit San  
22 Francisco often, and I have carried on the BART trains several times. Having seen  
23 the news, I know crimes on BART have become more common, and I want to be  
24 prepared to defend my wife as well as myself in the event of such an attack. SB 2  
25 bars me carrying on BART in the future, because it restricts carry on public  
26 transportation.

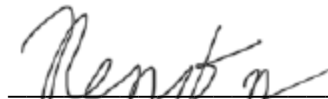
27       12. These are, of course, just a few examples of how SB 2 will affect me, and as  
28 I go about my daily life, I am sure to discover several more. SB 2 will essentially

1 destroy my constitutional right to carry, as so few of the places I go to on a daily  
2 basis will permit carry, and I don't want to expose my firearm to theft by constantly  
3 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would  
4 continue to carry in all of these places as I did before the law took effect.

5 I declare under penalty of perjury that the foregoing is true and correct.

6 Executed on September 29, 2023.

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Reno May, declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

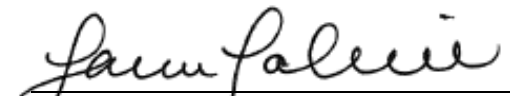
**DECLARATION OF RENO MAY IN SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
4 [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
5 Konstadinos T. Moros – SBN 306610  
6 [kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
7 MICHEL & ASSOCIATES, P.C.  
8 180 E. Ocean Blvd., Suite 200  
9 Long Beach, CA 90802  
10 Telephone: (562) 216-4444  
11 Facsimile: (562) 216-4445

12 Donald Kilmer-SBN 179986  
13 Law Offices of Donald Kilmer, APC  
14 14085 Silver Ridge Road  
15 Caldwell, Idaho 83607  
16 Telephone: (408) 264-8489  
17 Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF SAM PAREDES  
IN SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY  
INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney



**DECLARATION OF SAM PAREDES**

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1. I, Sam Paredes, am the Executive Director of Gun Owners of California, Inc. (“GOC”), a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. GOC is recognized as a 501(c)(4) non-profit mutual benefit corporation under the Internal Revenue Code and a recognized non-profit membership corporation under the state of California. GOC is incorporated in the state of California and is currently headquartered in El Dorado Hills, California.

3. GOC is dedicated to the preservation and restoration of the Second Amendment in California. It was formed for the express purpose of promoting, encouraging, and advocating for the purchase, use, and ownership of firearms and related products. GOC opposes legislation that it deems harmful to the right to keep and bear arms, while fighting to protect the Second Amendment rights of all Californians at the capitol, in the courts, and through elections. GOC strongly believes that the rights enshrined in the Second Amendment guarantees those enshrined by the First Amendment.

4. Many GOC members in California have valid and current concealed carry weapon (“CCW”) permits, which enables them to lawfully carry a concealed firearm in public, so that they can defend themselves (and potentially others) with lethal force in the event of a life-threatening emergency situation.

5. Because SB 2 would prohibit GOC’s members in California from carrying in many places where they often carry and are accustomed to concealed carrying a firearm, the utility of their CCWs, and thus their right to be armed for self-defense in public, will be severely curtailed and outright eliminated in many common locations.

6. For example, under SB 2 they cannot carry where alcohol for consumption on the premises is served. That means they cannot conceal carry at restaurants they


1 patronize on a regular basis, nor carry in the parking area outside such an  
2 establishment.

3 7. SB 2 also prohibits GOC members in California from concealed carrying in  
4 parks and public lands they often frequent. And under SB 2, carry is prohibited at  
5 urgent care facilities which GOC members have used in the past for rapid medical  
6 attention and would use in the future. Under SB 2, carry is prohibited at financial  
7 institutions such as banks that GOC members frequent.

8 8. Perhaps most significantly, under SB 2, concealed carry is prohibited at any  
9 privately owned commercial establishment that does not affirmatively display  
10 notice that the establishment tolerates concealed carry at the establishment's  
11 premises. There are many local businesses that GOC members frequent that will  
12 likely not post such signs, forcing them to either not carry there or stop patronizing  
13 them.

14 9. These are just a few examples of how SB 2 harms our members. Suffice it to  
15 say, GOC believes that SB 2 is abhorrent and incompatible with the general right of  
16 Americans, including Californians who are GOC members, to carry a firearm in  
17 public for self-defense.

18  
19 I declare under penalty of perjury that the foregoing is true and correct.  
20 Executed within in the United States on September 29, 2023.

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25 Sam Paredes, declarant  
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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

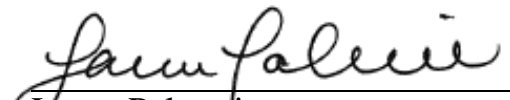
**DECLARATION OF SAM PAREDES IN SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin

1 C. D. Michel – SBN 144258  
cmichel@michellawyers.com  
2 Sean A. Brady – SBN 262007  
sbrady@michellawyers.com  
3 Konstadinos T. Moros – SBN 306610  
kmoros@michellawyers.com  
4 MICHEL & ASSOCIATES, P.C.  
180 E. Ocean Blvd., Suite 200  
5 Long Beach, CA 90802  
Telephone: (562) 216-4444  
6 Facsimile: (562) 216-4445

7 Donald Kilmer-SBN 179986  
Law Offices of Donald Kilmer, APC  
8 14085 Silver Ridge Road  
Caldwell, Idaho 83607  
9 Telephone: (408) 264-8489  
Email: Don@DKLawOffice.com

10 Attorneys for Plaintiffs

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **SOUTHERN DIVISION**

14 RENO MAY, an individual;  
15 ANTHONY MIRANDA, an individual;  
ERIC HANS, an individual; GARY  
16 BRENNAN, an individual; OSCAR A.  
BARRETTO, JR., an individual;  
17 ISABELLE R. BARRETTO, an  
individual; BARRY BAHRAMI, an  
18 individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
19 individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
20 DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
21 OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
22 OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
23 CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

24 Plaintiffs,

25 v.

26 ROBERT BONTA, in his official  
capacity as Attorney General of the  
27 State of California, and DOES 1-10,

28 Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF DR. SHELDON  
HOUGH IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF DR. SHELDON HOUGH**

1  
2 1. I, Sheldon Hough, am a plaintiff in the above-entitled action. I make this  
3 declaration of my own personal knowledge and, if called as a witness, I could and  
4 would testify competently to the truth of the matters set forth herein.

5 2. I am a current resident of San Bernardino County, California.

6 3. I am a law-abiding adult who is not prohibited from owning firearms under  
7 the laws of the United States of America or the state of California. I have never  
8 been found by any law enforcement agency, any court, or any other government  
9 agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a  
10 member of the California Rifle & Pistol Association, another plaintiff in this matter.

11 4. I am a veteran who served four years as a Navy Corpsman (medic) attached  
12 to the Marines during the Vietnam war. I graduated from the USC School of  
13 Dentistry in 1980. I am the President of the board of Hi-Desert Water District (a  
14 special district in the State of California). I have served on that board for 17 years  
15 and this is the second 4-year election cycle where I was re-elected unopposed. I am  
16 the former President of the Rotary Club of Yucca Valley.

17 5. I have a valid and current California concealed carry weapon (“CCW”)  
18 permit issued by the San Bernardino County Sheriff’s Department.

19 6. I legally carry a concealed firearm with me on a daily basis, so that I may be  
20 armed and be able to defend myself and potentially others in the event of a life-  
21 threatening emergency situation. Prior to SB 2, I only didn’t carry my pistol when  
22 planning on going to one of the few places where carry was not permitted, such as a  
23 school or courthouse.

24 7. Because SB 2 would prohibit me from carrying in many places where I am  
25 accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus  
26 my right to be armed for self-defense in public, will be outright eliminated in nearly  
27 all common contexts.

28 8. For example, under SB 2 I cannot carry in any establishment where alcohol is

1 served. My wife and I have been married since 1970 and have made a commitment  
2 to never drink. That means I cannot conceal carry at most of the restaurants that I  
3 patronize on a regular basis, nor can I even carry in the parking area of such  
4 establishments, even though there is absolutely zero risk of me becoming  
5 intoxicated while carrying.

6 9. Those two provisions of SB 2 are hardly the only two that will impact me. I  
7 can't carry while I stop at a gas station to fill up my car, because most gas stations  
8 sell lottery tickets inside, making them off-limits for carry. Under SB 2, carry is  
9 also prohibited at urgent care facilities which I have utilized in the past for medical  
10 attention and would use in the future. Carry is also prohibited at financial  
11 institutions such as my local bank that I frequent, and a variety of other places that I  
12 regularly visit.

13 10. I run a dental office in the Yucca Valley and have practiced dentistry since  
14 1981. For many years now, I have carried while at work for my own safety and the  
15 safety of my staff. SB 2 insultingly took away my right to carry in my own clinic  
16 due to its prohibitions on carrying in medical facilities.

17 11. I assume that many of my patients legally carry as well, as many people in  
18 San Bernardino County have CCW permits. I have no issue with peaceable people  
19 carrying into my dental office. Yet now, under SB 2, if I want to continue to allow  
20 people to do so, I must put up a sign on my door affirmatively allowing concealed  
21 carry. This forces my business to publicly take a position on a contentious issue,  
22 and may needlessly alienate patients who oppose gun rights. Further, I don't want  
23 to be a part of legitimizing California's unconstitutional scheme by agreeing to put  
24 up such a sign if I want to support the Second Amendment. Americans generally  
25 have the right to carry firearms, and shouldn't need to have permission to do so at  
26 every private business they visit.

27 12. And, of course, even if such a sign were not required, my patients are also  
28 barred from carrying for the same reason I am given SB 2's restrictions on carrying


1 in medical facilities. I oppose both of those provisions, and indeed, all of SB 2’s  
2 new restrictions on places where carry is no longer allowed.

3 13. These are, of course, just a few examples of how SB 2 affects me, and as I go  
4 about my daily life, I am sure to discover several more. SB 2 will essentially  
5 destroy my constitutional right to carry, as so few of the places I go to on a daily  
6 basis will permit carry, and I don’t want to expose my firearm to theft by constantly  
7 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would  
8 continue to carry in all of these places as I did before the law took effect.

9 I declare under penalty of perjury that the foregoing is true and correct.

10 Executed on September 29, 2023.

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Dr. Sheldon Hough, declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

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I am not a party to the above-entitled action. I have caused service of:

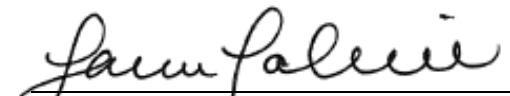
**DECLARATION OF DR. SHELDON HOUGH IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

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

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin



### **CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2024, an electronic PDF of APPELLEES' SUPPLEMENTAL EXCERPTS OF RECORD VOLUME I OF I was uploaded to the Court's CM/ECF system, which will automatically generate and send by electronic mail a Notice of Docket Activity to all registered attorneys participating in the case. Such notice constitutes service on those registered attorneys.

Date: February 16, 2024

**MICHEL & ASSOCIATES, P.C.**

*s/C.D. Michel*  
\_\_\_\_\_  
C.D. Michel  
*Counsel for Plaintiffs-Appellees*