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13 Attorneys for Plaintiffs

14 **UNITED STATES DISTRICT COURT**  
15 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

16 LANA RAE RENNA, an individual;  
17 DANIELLE JAYMES, an individual;  
18 HANNAH SPOUSTA, an individual;  
19 LAURA SCHWARTZ, an individual;  
20 MICHAEL SCHWARTZ, an individual;  
21 ROBERT MACOMBER, an individual;  
22 CLINT FREEMAN, an individual;  
23 RICHARD BAILEY, an individual;  
24 JOHN KLIER, an individual; JUSTIN  
25 SMITH, an individual; JOHN  
26 PHILLIPS, an individual; PWGG, L.P., a  
27 California Limited Partnership;  
28 CHERYL PRINCE, an individual;  
DARIN PRINCE, an individual; NORTH  
COUNTY SHOOTING CENTER, INC.,  
a California Corporation; RYAN  
PETERSON, an individual;  
GUNFIGHTER TACTICAL, LLC, a  
California Limited Liability Company,  
FIREARMS POLICY COALITION,

Case No. 3:20-cv-02190-DMS-DEB

**DECLARATION OF PLAINTIFF  
CHERYL PRINCE IN SUPPORT  
OF PLAINTIFFS' OPPOSITION  
TO DEFENDANTS' MOTION TO  
DISMISS**

Date/Time: To Be Set By Court  
Time: 13A  
Judge: Hon. Dana M. Sabraw  
Trial Date: None set  
Action Filed: 11/10/2020

1 INC.; SAN DIEGO COUNTY GUN  
2 OWNERS PAC; CITIZENS  
3 COMMITTEE FOR THE RIGHT TO  
4 KEEP AND BEAR ARMS; and  
5 SECOND AMENDMENT  
6 FOUNDATION,

7 Plaintiffs,

8 vs.

9 XAVIER BECERRA, in his official  
10 capacity as Attorney General of  
11 California; and LUIS LOPEZ, in his  
12 official capacity as Director of the  
13 Department of Justice Bureau of  
14 Firearms,

15 Defendants.

16 I, CHERYL PRINCE, declare as follows:

17 1. I am an adult resident of the County of San Diego, California, and am  
18 a named Plaintiff in the above matter. I have personal knowledge of the facts  
19 stated herein, and if called as a witness, I could competently testify to these facts.

20 2. This declaration is executed in support of Plaintiffs' Opposition to  
21 Defendants' Motion to Dismiss.

22 3. I am not prohibited under state or federal law from possessing,  
23 receiving, owning, or purchasing a firearm.

24 4. I am a member and supporter of Plaintiffs FIREARMS POLICY  
25 COALITION, SAN DIEGO COUNTY GUN OWNERS PAC, CITIZENS

1 COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS, and SECOND  
2 AMENDMENT FOUNDATION.

3  
4 5. I hold an active license to carry a concealed weapon (“CCW”) issued  
5 by my county sheriff, after proving “good cause” and “good moral character” to  
6 my licensing authority, successfully completing a course of training on the law and  
7 firearms proficiency under § 26165 and passing an extensive Live Scan-based  
8 background check and placement into the State’s system for monitoring law  
9 enforcement contact, arrests, and criminal convictions (“Rap Back”).  
10  
11

12 6. But for California’s Handgun Ban and Defendants’ active  
13 enforcement thereof, I would purchase for self-defense and other lawful purposes a  
14 Sig Sauer P365, a handgun in common use for self-defense and lawful purposes  
15 and widely sold and possessed outside of California.  
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18 7. Because the handgun that I seek to purchase for lawful purposes is  
19 currently excluded from Defendants’ Roster of purportedly “safe” handguns,  
20 California’s Handgun Ban bars me from purchasing and taking possession of such  
21 handguns from a licensed retailer, who are likewise prohibited from selling them to  
22 me on pain of criminal sanction.  
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25 8. I have no other lawful method of purchasing this handgun in  
26 California.  
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on 02/15/2021.



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CHERYL PRINCE