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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  
DANIELLE JAYMES 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, DANIELLE JAYMES, 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 stated  
19 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 possess a valid COE issued by the Defendants' Department of Justice  
25 Bureau of Firearms.

1           5.     I am a member and supporter of Plaintiffs FIREARMS POLICY  
2 COALITION, SAN DIEGO COUNTY GUN OWNERS PAC, CITIZENS  
3  
4 COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS, and SECOND  
5 AMENDMENT FOUNDATION.

6  
7           6.     I hold an active license to carry a concealed weapon (“CCW”) issued  
8 by my county sheriff, after proving “good cause” and “good moral character” to  
9 my licensing authority, successfully completing a course of training on the law and  
10 firearms proficiency under § 26165 and passing an extensive Live Scan-based  
11 background check and placement into the State’s system for monitoring law  
12 enforcement contact, arrests, and criminal convictions (“Rap Back”).  
13  
14

15           7.     But for California’s Handgun Ban and Defendants’ active  
16 enforcement thereof, I would purchase for self-defense and other lawful purposes a  
17 Sig 365, G43X, Glock 19 Gen5, Sig P320, and/or Nighthawk Lady Hawk, all of  
18 which are handguns in common use for self-defense and other lawful purposes and  
19 widely sold and possessed outside of California.  
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22           8.     The Sig 365 and G43X are specifically designed as concealed carry  
23 weapons. The Sig 365, specifically, is the smallest 9 mm handgun that would be  
24 easy for a woman to use as a concealed carry handgun. The handguns on  
25 Defendants’ Roster are not even close to being small enough to be concealed carry  
26 weapons, especially for a woman. I do not wish to carry a gun in a large purse,  
27  
28

1 which is what I currently have to do with the guns on Defendants' Roster. I want  
2 to be able to have easy access to the handgun somewhere on my person for self-  
3 defense purposes, which I would be able to do with both the Sig 365 and G43X.  
4 The concealed carry weapons on Defendants' Roster are not practical caliber-wise.  
5 They only offer .22 mm concealed carry handguns for self-defense, and I would  
6 not feel comfortable defending myself with a .22 mm handgun as opposed to a  
7 9mm.  
8

9  
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11 9. I would use the Glock 19 Gen5 and Sig P320 as home defense  
12 handguns. The Glock 19 Gen5 is the newest generation of the Glock 19. The  
13 Glock 19 Gen3 is the version on Defendants' Roster. The Glock 19 Gen3 was  
14 developed many years ago and has outdated technology. Both the Glock 19 Gen5  
15 and Sig P320 have had have newer technology and better safety features that  
16 makes them easier and safer to use for self-defense purposes than the guns on  
17 Defendants' Roster.  
18

19  
20 10. I wish to purchase the Nighthawk Lady Hawk because it is a gun  
21 specifically designed for women and smaller hands. It is easier to hold onto and  
22 fits my hands better than the guns on Defendants' Roster. I would be able to use  
23 this gun more safely and accurately than the guns currently available to purchase  
24 on Defendants' Roster.  
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11. Because the handguns that I seek to purchase for lawful purposes are currently excluded from Defendants’ Roster of purportedly “not unsafe” handguns, California’s Handgun Ban bars me from purchasing and taking possession of them from a licensed retailer, who are likewise prohibited from selling them to me on pain of criminal sanction.

12. I have no other lawful method of purchasing these handguns in California.

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

02/13/2021

Executed on \_\_\_\_\_.



\_\_\_\_\_  
DANIELLE JAYMES