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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  
DARIN 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, DARIN 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 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 am an owner and manager of Plaintiff NORTH COUNTY  
25 SHOOTING CENTER, INC. ("NCSC"), the proprietor of the business, and the  
26

1 individual licensee associated with the dealership, including by and through the  
2 Defendants and their Bureau of Firearms.

3  
4 5. I am a member and supporter of Plaintiffs FIREARMS POLICY  
5 COALITION, SAN DIEGO COUNTY GUN OWNERS PAC, CITIZENS  
6 COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS, and SECOND  
7 AMENDMENT FOUNDATION.  
8

9  
10 6. I possess a current COE issued by the Defendants’ Department of  
11 Justice Bureau of Firearms.

12  
13 7. I hold an active license to carry a CCW issued by my county sheriff  
14 under Penal Code § 26150, *et seq.*, after proving “good cause” and “good moral  
15 character” to that licensing authority, successfully completing a course of training  
16 on the law and firearms proficiency under § 26165, passing an extensive Live  
17 Scan-based Department of Justice background check, and placement into the “Rap  
18 Back” system for monitoring law enforcement contact, arrests, and criminal  
19 convictions.  
20

21  
22 8. But for California’s Handgun Ban and Defendants’ active  
23 enforcement thereof, I would purchase for self-defense and other lawful purposes a  
24 Sig Sauer P320 AXG Scorpion, a handgun in common use for self-defense and  
25 other lawful purposes and widely sold and possessed outside of California.  
26  
27  
28

1 9. Because the handguns that I seek to purchase for lawful purposes are  
2 currently excluded from Defendants’ Roster of purportedly “safe” handguns,  
3  
4 California’s Handgun Ban bars me from purchasing and taking possession of such  
5 handguns from a licensed retailer, who are likewise prohibited from selling them to  
6 me on pain of criminal sanction.  
7

8 10. I have no other lawful method of purchasing these handguns in  
9 California.  
10

11 11. Further, as the proprietor of Plaintiff NCSC, but for California’s  
12 Handgun Ban and Defendants’ active enforcement thereof, I would make  
13 commercially available all handguns in common use for self-defense and other  
14 lawful purposes that are widely sold and possessed outside of California, which are  
15 currently excluded from Defendants’ handgun Roster, and sell and transfer them to  
16 law-abiding customers.  
17  
18

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

20 Executed on <sup>02/15/2021</sup> \_\_\_\_\_.

*Darin L Prince*

\_\_\_\_\_  
DARIN PRINCE