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

5
6 5. I am a member and supporter of Plaintiffs FIREARMS POLICY
7 COALITION, SAN DIEGO COUNTY GUN OWNERS PAC, CITIZENS
8 COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS, and SECOND
9 AMENDMENT FOUNDATION.
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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 Glock 19 Gen5 and/or Springfield Armory Hellcat, which are both handguns in
15 common use for self-defense and lawful purposes and widely sold and possessed
16 outside of California.
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19 7. I wish to purchase the Glock 19 Gen5 because of the ambidextrous
20 slide release. This is crucial to my gun safety training. I specifically train to be
21 able to use both my right hand and my left hand to safely shoot a gun for self-
22 defense purposes. If I were to shoot with my left hand using the current Glock 19
23 Gen3 on Defendants’ Roster, it would be very unsafe because there is no left-
24 handed slide release. Additionally, the Glock 19 Gen3 does not come with
25 adjustable backstraps. I have smaller than average hands and in order to get a solid
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1 and safe grip on the gun, I need the adjustable hand straps. The Glock 19 Gen5
2 provides adjustable straps that makes it more accurate for me to shoot and safer for
3 me to shoot.
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5 8. I wish to purchase the Springfield Armory Hellcat because it is a more
6 appropriate concealed carry handgun that still holds 10 rounds. I am not able to
7 purchase a suitable concealed carry weapon that still holds 10 rounds on
8 Defendants' Roster. I also wish to purchase the Springfield Armory Hellcat
9 because this gun is smaller than the concealed carry weapons on Defendants'
10 Roster. I would be able to get a tighter and overall better grip on the gun. This gun
11 would therefore be safer and more accurate to shoot than any concealed carry gun
12 on Defendants' Roster.
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16 9. Because the handguns that I seek to purchase for lawful purposes are
17 currently excluded from Defendants' Roster of purportedly "safe" handguns,
18 California's Handgun Ban bars me from purchasing and taking possession of such
19 handguns from a licensed retailer, who are likewise prohibited from selling them to
20 me on pain of criminal sanction.
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23 10. I have no other lawful method of purchasing these handguns in
24 California.
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I declare under penalty of perjury that the foregoing is true and correct.

02/14/2021

Executed on _____.



LAURA SCHWARTZ