

1 Raymond M. DiGuiseppe
2 The DiGuiseppe Law Firm, P.C.
3 4320 Southport-Supply Road, Suite 300
4 Southport, NC 28461
5 Tel.: 910-713-8804
6 Email: law.rmd@gmail.com

7 Michael P. Sousa
8 Law Offices of Michael P. Sousa, APC
9 3232 Governor Dr., Suite A
10 San Diego, CA 92122
11 Tel.: 858-453-6122
12 Email: msousa@msousalaw.com

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
RICHARD BAILEY 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, RICHARD BAILEY, declare as follows:

17 1. I am an adult resident of Coronado, California, and am a named
18 Plaintiff in the above matter. I have personal knowledge of the facts stated herein,
19 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 the elected Mayor of Coronado, California.

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

6. But for California’s Handgun Ban and Defendants’ active enforcement thereof, I would purchase for self-defense and other lawful purposes a Glock 19 Gen5, a handgun which is in common use for self-defense and other lawful purposes, widely sold and possessed outside of California.

7. Because the handgun that I seek to purchase for these constitutionally protected purposes is currently excluded from Defendants’ Roster of purportedly “not unsafe” handguns, California’s Handgun Ban bars me from purchasing and taking possession of such handguns from a licensed retailer, who are likewise prohibited from selling them to me on pain of criminal sanction.

8. I have no other lawful method of purchasing this handgun in California.

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

02/15/2021

Executed on _____.



RICHARD BAILEY