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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 ROBERT
MACOMBER 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, ROBERT MACOMBER, 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 enforcement
13 thereof, I would purchase for self-defense and other lawful purposes a Sig P365
14 and self-manufacture a Glock 43 Polymer 80, both of which are 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 would like to self-manufacture the Glock 43 Polymer 80 to use it as
20 a concealed carry handgun for self-defense. The Glock 17 and Glock 19 that are
21 on Defendants’ Roster are too large to use for a concealed carry weapon. The
22 Glock 43 is designed to be a concealable weapon. Another reason I would like to
23 self-manufacture the Glock 43 is because it carries 8 rounds and can still be used
24 for concealed carry.
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