

1 Alan Gura, Calif. Bar No.: 178221
2 Gura & Possessky, PLLC
3 101 N. Columbus St., Suite 405
4 Alexandria, VA 22314
5 703.835.9085/Fax 703.997.7665

6 Donald E.J. Kilmer, Jr., Calif. Bar No.: 179986
7 Law Offices of Donald Kilmer, A.P.C.
8 1645 Willow Street, Suite 150
9 San Jose, CA 95125
10 408.264.8489/Fax 408.264.8487

11 Jason A. Davis, Calif. Bar No.: 224250
12 Davis & Associates
13 27201 Puerta Real, Suite 300
14 Mission Viejo, CA 92691
15 949.310.0817/Fax 949.288.6894

16 IN THE UNITED STATES DISTRICT COURT
17 FOR THE EASTERN DISTRICT OF CALIFORNIA

18	Ivan Peña, et al.,)	Case No. 2:09-CV-01185-KJM-CKD
19	Plaintiffs,)	
20)	<u>DECLARATION OF GOTTLIEB</u>
21	v.)	
22)	In Support of Plaintiffs' Motion
23	Stephen Lindley,)	For Summary Judgment
24	Defendant.)	
25	_____)	

26 I, Alan Gottlieb, am competent to state, and to declare the following based on my
27 personal knowledge:

28 1. I am the Founder and Executive Vice President of the Second Amendment
29 Foundation, Inc.

30 2. The Second Amendment Foundation, Inc. ("SAF") is a non-profit membership
31 organization incorporated under the laws of Washington with its principal place of business in
32 Bellevue, Washington.

33 3. SAF has over 650,000 members and supporters nationwide, including many in the
34 state of California.

1 4. The purposes of SAF include education, research, publishing and legal action
2 focusing on the Constitutional right to privately own and possess firearms, and the consequences
3 of gun control.

4 5. SAF expends their resources encouraging exercise of the right to bear arms, and
5 advising and educating their members, supporters, and the general public about the legality of
6 particular firearms. The issues raised by, and consequences of, Defendant's policies, are of great
7 interest to CGF constituencies.

8 6. Defendant's policies regularly cause the expenditure of resources by SAF as
9 people turn to our organizations for advice and information.

10 7. Defendant's policies bar the board members and supporters of CGF from
11 obtaining numerous, if not most, handguns.

12 8. Members and supporters of the Second Amendment Foundation, Inc. ("SAF")
13 would acquire new semiautomatic handguns of the kind in common use throughout the United
14 States, for traditional lawful purposes including self-defense, but cannot do so owing to
15 California's rostering scheme.

16 9. California's handgun rostering scheme substantially limits commerce in (and
17 therefore SAF members and supporters' access to) unrostered handguns, since no dealer can
18 stock these firearms. This results in a significant loss of choice and price competition for
19 members and supporters of SAF.

20 10. Members and supporters of SAF who seek to conduct private party sales of off-
21 roster firearms would suffer increased costs in transporting and transferring their firearms from
22 out-of-state dealers even were these transfers lawful. They would not suffer these costs if the
23 firearms were available for sale in California.

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11. Defendants' policies make firearms less accessible to the public, reduce the opportunity for selection and purchase, lessen price competition, and impose additional expenses on the purchase of firearms.

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

Executed this the 24th day of October, 2013, in Bellevue, WA.



Alan Gottlieb
Executive Vice President / Founder
Second Amendment Foundation