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7 Attorneys for Plaintiffs

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION**

11 MICHELLE FLANAGAN et al.,

12 Plaintiffs,

13 v.  
14

15 CALIFORNIA ATTORNEY  
GENERAL XAVIER BECERRA, in his  
16 official capacity as Attorney General of  
the State of California, et al.,

17 Defendants.  
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Case No.: 2:16-cv-06164-JAK-AS

**DECLARATION OF RICK TRAVIS  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR SUMMARY  
JUDGMENT**

Judge: John A. Kronstadt  
Hearing Date: November 6, 2017  
Hearing Time: 8:30 AM  
Courtroom: 10B

Action Filed: August 17, 2016  
Trial Date: February 6, 2018

**DECLARATION OF RICK TRAVIS**

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2 1. I, Rick Travis, am the Executive Director for Plaintiff CALIFORNIA RIFLE  
3 & PISTOL ASSOCIATION, INCORPORATED (hereafter “CRPA”). I make this  
4 declaration of my own personal knowledge and, if called as a witness, I could and  
5 would testify competently to the truth of the matters set forth herein.

6 2. CRPA is a non-profit membership and donor-supported organization  
7 classified under 501(c)(4) and incorporated under the laws of California with its  
8 headquarters in Fullerton, California.

9 3. Founded in 1875, the CRPA seeks to defend the Second Amendment and  
10 advance laws that protect the rights of individual citizens. CRPA works to preserve  
11 the constitutional and statutory rights of gun ownership, including the right to self-  
12 defense, the right to hunt, and the right to keep and bear arms. CRPA is also dedicated  
13 to promoting the shooting sports, providing education, training, and organized  
14 competition for adult and junior shooters.

15 4. CRPA’s members include law enforcement officers, prosecutors,  
16 professionals, firearm experts, and members of the public of all law-abiding  
17 individuals, including the fundamental right to “bear” or “carry” firearms for the core  
18 lawful purpose of self-defense.

19 5. I am informed and aware that law-abiding CRPA members who reside in  
20 Los Angeles County applied for Carry Licenses to carry a firearm for self-defense and  
21 were denied.

22 6. I am informed that law-abiding CRPA members who reside in Los Angeles  
23 County wish to obtain a Carry License, but refrain from applying and wasting their  
24 time and financial resources given that such application would be futile in light of Los  
25 Angeles County Sheriff James McDonnell’s official “good cause” policy.

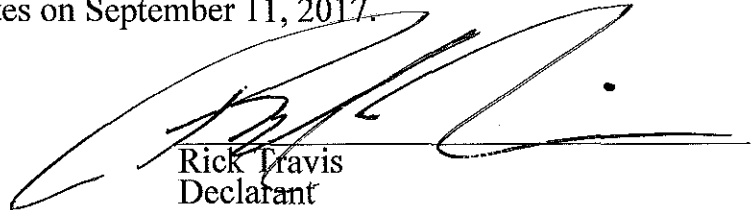
26 7. I know members of Plaintiff CRPA desire and intend to exercise their  
27 constitutional right to carry a firearm in public for self-defense, but they are precluded  
28 from doing so because they are unable to obtain a license to carry a firearm and

1 California law generally prohibits them from carrying a firearm in any manner openly  
2 or concealed, without such a license.

3 8. But for California's comprehensive restrictions on the public carriage of  
4 firearms and CRPA members' inability to obtain a carry license, CRPA members  
5 residing in Los Angeles County would immediately begin carrying a firearm in public  
6 for self-defense, but they refrain from doing so for fear of liabilities for violating one  
7 or more of California's laws that criminalize this conduct.

8 9. These CRPA members are thus prohibited from carrying a firearm for self-  
9 defense without risking criminal prosecution for exercising their constitutional right to  
10 bear arms.

11 I declare under penalty of perjury that the foregoing is true and correct.  
12 Executed within the United States on September 11, 2017.

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15 Rick Travis  
16 Declarant  
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**CERTIFICATE OF SERVICE**  
**IN THE UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**WESTERN DIVISION**

Case Name: *Flanagan, et al. v. California Attorney General Xavier Becerra, et al.*  
Case No.: 2:16-cv-06164-JAK-AS

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**DECLARATION OF RICK TRAVIS IN SUPPORT OF PLAINTIFFS’  
MOTION FOR SUMMARY JUDGMENT**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Xavier Becerra, Attorney General of California	<i>Attorneys for Attorney</i>
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E-mail: Jonathan.Eisenberg@doj.ca.gov	
300 South Spring Street, Suite 1702	
Los Angeles, CA 90013	

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

Executed September 11, 2017

/s/ Laura Palmerin

Laura Palmerin