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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **SOUTHERN DIVISION**

11 STEVEN RUPP; STEVEN DEMBER;  
12 CHERYL JOHNSON; MICHAEL  
JONES; CHRISTOPHER SEIFERT;  
13 ALFONSO VALENCIA; TROY WILLIS;  
DOUGLAS GRASSEY; DENNIS  
14 MARTIN; and CALIFORNIA RIFLE &  
PISTOL ASSOCIATION,  
15 INCORPORATED,

16 Plaintiffs,

17 v.

18 XAVIER BECERRA, in his official  
capacity as Attorney General of the State  
19 of California; and DOES 1-10,

20 Defendant.  
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Case No: 8:17-cv-00746-JLS-JDE

**DECLARATION OF RICHARD  
TRAVIS IN SUPPORT OF MOTION  
FOR PRELIMINARY INJUNCTION**

Hearing Date: December 15, 2017

Hearing Time: 2:30 p.m.

Courtroom: 10A

Judge: Hon. Josephine L. Staton

**DECLARATION OF RICHARD TRAVIS**

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2 1. I, Richard Travis, am the Executive Director for Plaintiff CALIFORNIA  
3 RIFLE & PISTOL ASSOCIATION, INCORPORATED (hereafter “CRPA”). I make this  
4 declaration of my own personal knowledge and, if called as a witness, I could and would  
5 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 IRC section 501(c)(4) and incorporated under the laws of California with  
8 its 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 the  
11 constitutional and statutory rights of gun ownership, including the right to self-defense,  
12 the right to hunt, and the right to keep and bear arms. CRPA is also dedicated to  
13 promoting the shooting sports, providing education, training, and organized competition  
14 for adult and junior shooters.

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

19 5. I know members of Plaintiff CRPA who already possess rifles meeting the  
20 new definition of “assault weapon” who will not be able to meet California’s registration  
21 requirements because they do not know and do not have any readily available source to  
22 discover: (1) the exact date they acquired the rifle; or (2) the name or address of the  
23 individual or business from whom they acquired the rifle.

24 6. I have been informed that some of these CRPA members intend to  
25 dispossess themselves of their “assault weapons” to avoid risking criminal prosecution  
26 for illegal possession of an unregistered “assault weapon.” I have also been informed that  
27 but for being unable to meet California Penal Code section 30900, subdivision (b)(3)’s  
28 requirements to provide the exact date they acquired their “assault weapons” and the

1 address of the individual or business from whom they acquired them, at least some of  
2 these CRPA members would register their “assault weapons” and continue to possess  
3 them.

4 7. Prior to the filing of this lawsuit, I was informed that DOJ had submitted  
5 proposed regulations regarding the registration of newly classified “assault weapons” on  
6 or about December 30, 2016. The proposed regulations did not address how DOJ would  
7 process “assault weapon” registration applications for individuals who do not know, and  
8 have no readily available source to discover, the exact date on which the firearm was  
9 acquired or the name and/or address of the individual or business from whom it was  
10 acquired.

11 8. In response to these proposed regulations, Plaintiff CRPA instructed its legal  
12 counsel to prepare and submit a letter of comment. This comment letter was submitted on  
13 January 9, 2017 and addressed numerous problems with those proposals, including an  
14 explanation that some lawful owners of “assault weapons” would be unable to provide  
15 the date they acquired their “assault weapons” or the name or address of the person or  
16 entity from which they acquired them.

17 9. The following month, I was informed that DOJ voluntarily withdrew its  
18 proposed regulations regarding the registration of newly classified “assault weapons” on  
19 February 13, 2017.

20 10. Three months later, and after this lawsuit had been filed, I was informed  
21 DOJ resubmitted proposed regulations regarding the registration of newly classified  
22 “assault weapons” on or about May 15, 2017. This second set of proposed regulations  
23 was substantially similar to the first, and still did not address how DOJ would process  
24 “assault weapon” registration applications for individuals who do not know, and have no  
25 readily available source to discover, the exact date on which the firearm was acquired or  
26 the name and address of the individual or business from whom it was acquired.

27 11. In response, CRPA instructed its legal counsel to prepare and submit another  
28 letter of comment. This comment letter was submitted on June 19, 2017 and again

1 pointed out the same problem.

2 12. On or about June 26, 2017, I was informed that DOJ's second set of  
3 proposed regulations regarding the registration of newly classified "assault weapons"  
4 were officially rejected by the Office of Administrative Law.

5 13. The following month, I was informed that DOJ submitted a third set of  
6 proposed regulations regarding the registration of newly classified "assault weapons" on  
7 July 21, 2017. This third set of proposed regulations was substantially similar to DOJ's  
8 first two proposals, and still lacked any clarification on how DOJ would process "assault  
9 weapon" registration applications for individuals who do not know, and have no readily  
10 available source to discover, the exact date on which the firearm was acquired or the  
11 name and address of the individual or business from whom it was acquired.

12 14. In response, CRPA instructed its legal counsel to prepare and submit another  
13 letter of comment. But before CRPA's legal counsel could do so, I was informed that  
14 DOJ's regulations were officially adopted on or about August 2, 2017.

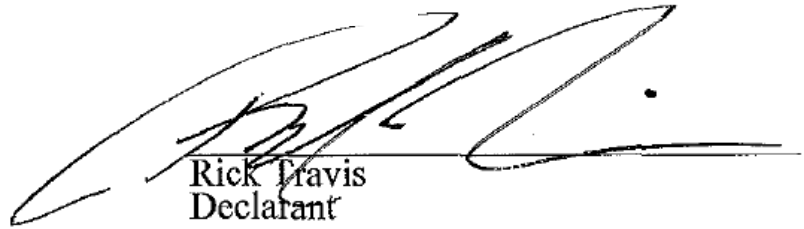
15 15. Because DOJ's regulations fail to address how DOJ would process "assault  
16 weapon" registration applications for individuals who do not know, and have no readily  
17 available source to discover, the exact date on which the firearm was acquired or the  
18 name and address of the individual or business from whom it was acquired, and because  
19 DOJ had otherwise failed to provide any additional guidance to Plaintiffs or similarly  
20 situated individuals on what to do in such a situation, Plaintiff CRPA's legal counsel  
21 amended the complaint in this lawsuit to challenge that requirement.

22 16. In addition to amending the complaint, CRPA's legal counsel also prepared  
23 and filed a separate lawsuit in California's superior court challenging the recently enacted  
24 regulations regarding the registration of "assault weapons" on the grounds that they  
25 violate California's Administrative Procedures Act. That lawsuit, titled *Villanueva v.*  
26 *Becerra*, Case No. 17CECG03093, was filed in Fresno County Superior Court on  
27 September 8, 2017.

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

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Rick Travis  
Declarant

**CERTIFICATE OF SERVICE**

IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

Case Name: *Rupp, et al. v. Becerra*  
Case No.: 8:17-cv-00746-JLS-JDE

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 RICHARD TRAVIS IN SUPPORT OF  
MOTION FOR PRELIMINARY INJUNCTION**

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  
Peter H. Chang  
Deputy Attorney General  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102  
E-mail: peter.chang@doj.ca.gov

I declare under penalty of perjury that the foregoing is true and correct. Executed November 14, 2017.

/s/Laura Palmerin  
Laura Palmerin