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10 Attorneys for Plaintiffs

11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 KIM RHODE, et al.,

14 Plaintiffs,

15 v.

16 XAVIER BECERRA, in his official
17 capacity as Attorney General of the State
18 of California,

19 Defendant.

Case No.: 3:18-cv-00802-BEN-JLB

**DECLARATION OF RICHARD
TRAVIS**

Hearing Date: August 19, 2019
Hearing Time: 10:30 a.m.
Courtroom: 5A
Judge: Hon. Roger T. Benitez

DECLARATION OF RICK TRAVIS

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2 1. I, Richard Travis, make this declaration of my own personal knowledge and,
3 if called as a witness, I could and would testify competently to the truth of the matters set
4 forth herein.

5 2. I am the Executive Director of the California Rifle & Pistol Association,
6 Incorporated (“CRPA”), a nonprofit membership and donor-supported organization
7 qualified as a tax-exempt under 26 U.S.C. § 501(c)(4) with its headquarters in Fullerton,
8 California. CRPA is a plaintiff in this action.

9 3. Founded in 1875, CRPA seeks to defend the civil rights of all law-abiding
10 individuals, including the fundamental right to acquire and possess ammunition. CRPA
11 regularly provides guidance to California gun owners regarding their legal rights and
12 responsibilities. In addition, CRPA is dedicated to promoting the shooting sports and
13 providing education, training, and organized competition for adult and junior shooters.
14 CRPA members include law enforcement officers, prosecutors, professionals, firearm
15 experts, and the public.

16 4. In this suit, CRPA represents the interest of the tens of thousands of its
17 members who reside in or visit the state of California, including in San Diego County,
18 and who are too numerous to conveniently bring in this action individually. Those
19 members’ interests include their intent to exercise their constitutionally protected right to
20 acquire and otherwise transact in ammunition.

21 5. Many of CRPA’s members have been adversely affected by California’s
22 new ammunition sales restrictions, including those that took effect on January 1, 2018,
23 and more recently on July 1, 2019.

24 6. I am aware of CRPA members who were not provided any guidance from
25 DOJ regarding the July 1, 2019.

26 7. I am aware of CRPA members who have been denied an ammunition sale
27 because their driver’s license or identification card have a “FEDERAL LIMITS APPLY”
28 notation and they lacked the required supplemental documentation.

1 8. I am aware of CRPA members who have been denied ammunition purchases
2 as of July 1, 2019, because their California issued identification contains a “FEDERAL
3 LIMITS APPLY” notation and they did not or do not otherwise have the ability to
4 provide supplemental proof of lawful U.S. presence as required by DOJ’s new emergency
5 regulation.

6 9. I am aware of CRPA members who are unable to renew their existing
7 Certificate of Eligibility issued by DOJ because their California issued identification
8 contains a “FEDERAL LIMITS APPLY” notation and they do not otherwise have the
9 ability to provide supplemental proof of lawful U.S. presence, as required by DOJ’s new
10 emergency regulation.

11 10. I am aware of CRPA members who are reporting ammunition transaction
12 processing times ranging anywhere from 20-30 minutes—often longer—as a result of the
13 new July 1, 2019, ammunition transaction requirements.

14 11. I am aware of CRPA members who have been have been denied an
15 ammunition transaction that are not prohibited from owning or possessing firearms.

16 12. I am aware of CRPA members who are not California residents but who visit
17 California.

18 13. I am aware of CRPA members who, to correct any issues with their AFS
19 records for purposes of purchasing ammunition, have been forced to request a copy of
20 their AFS records. These same individuals have reported times as long as three to four
21 months before DOJ has responded with a copy of their AFS records.

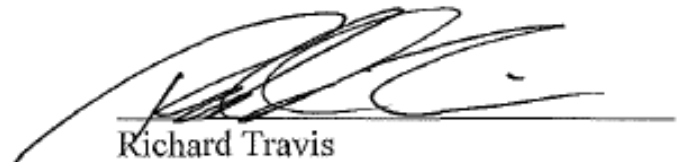
22 14. I am aware of CRPA members and employees who have submitted
23 Certificate of Eligibility applications which have taken several weeks to process and costs
24 over \$71 when submitting an initial application.

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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 July 22, 2019.

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5 Richard Travis
6 Declarant
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CERTIFICATE OF SERVICE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

Case Name: *Rhode, et al. v. Becerra*
Case No.: 3:18-cv-00802-JM-JMA

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, declare under penalty of perjury that I am a citizen of the United States over 18 years of age. My business address is 180 East Ocean Boulevard, Suite 200 Long Beach, CA 90802. I am not a party to the above-entitled action.

I have caused service of the following documents, described as:

DECLARATION OF RICHARD TRAVIS

on the following parties by electronically filing the foregoing on July 22, 2019, with the Clerk of the District Court using its ECF System, which electronically notifies them.

Nelson R. Richards
Deputy Attorney General
nelson.richards@doj.ca.gov
2550 Mariposa Mall, Room 5090
Fresno, CA 93721

*Attorneys for Defendant Attorney General
Xavier Becerra*

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 22, 2019, at Long Beach, CA.

s/ Laura Palmerin
Laura Palmerin