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

JAMES FAHR; DESIREE
BERGMAN; COLIN RUDOLPH;
SAN DIEGO COUNTY GUN
OWNERS PAC and, FIREARMS
POLICY COALITION, INC.,

Plaintiffs,

v.

CITY OF SAN DIEGO,
CALIFORNIA; and DAVID NISLEIT,
in his official capacity as Chief of
Police of San Diego City, California,

Defendants.

Case No.: '21CV1676 BAS BGS

DECLARATION OF COLIN RUDOLPH

I, Colin Rudolph, am competent to state and declare the following based on my personal knowledge:

1. I am a resident of San Diego, California.
2. I am a responsible, peaceable citizen not disqualified from exercising my right to possess firearms and ammunition.
3. I have a California Concealed Carry Permit.
4. I am not a licensed firearms manufacturer, importer, or dealer.
5. I am a member of Plaintiffs FPC and SDCGO.
6. I own and possess an uncompleted NFO, which I lawfully acquired before enactment of the Ban. My understanding is that this component would be an unfinished frame or unfinished receiver under the new definition of and prohibition against unserialized “unfinished frames” or “unfinished receivers” under San Diego’s Ban.
7. I desire and intend to use my unfinished frame or receiver, now prohibited under the Ordinance to construct a California-compliant firearm for my own self-defense, defense of others, and other lawful purposes.
8. My unfinished frame or receiver now prohibited under the Ordinance is of a type that would allow for the construction of a California-compliant AR-15-platform semi-automatic rifle in common use for lawful purposes by citizens throughout California and the United States.
9. I desire and intend to use for all lawful purposes, including self-defense,

defense of others, and proficiency training at my local shooting range in the exercise of my rights secured under the Second Amendment, the firearm that I would otherwise construct but for the Ban.

10. But for the Ordinance and Defendants' imminent enforcement of it, I would retain my now-prohibited unfinished frame or receiver and use it to construct such a firearm in common use for such purposes.

11. However, because of the Ordinance and Defendants' imminent enforcement of it, I must dispossess myself of the property within 30 days of the Ordinance's enactment or face criminal prosecution under § 53.18(c)(1) and thus forfeit the ability to use it for such protected purposes.

12. I also desire and intend to purchase, acquire, possess, and transport in San Diego additional unfinished frames and receivers prohibited under the Ordinance in the future so that I may construct other California-compliant firearms for my own self-defense, defense of others, and other lawful purposes in the exercise of my rights secured under the Second Amendment.

13. But for the Ordinance and Defendants' enforcement of it, I would exercise my constitutional right to purchase, acquire, possess, and transport in San Diego unfinished frames and receivers for the lawful and constitutionally protected purpose of constructing firearms in common use for self-defense, defense of others, and other lawful purposes.

I, Colin Rudolph, verify that I am a Plaintiff named in this action and all the information herein is true and correct to the best of my information, knowledge, and belief.

Dated: September 23, 2021

C. Rudolph

Colin Rudolph