

EXHIBIT A
DECLARATION OF PLAINTIFF LEONARD RUEBE
IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION

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16 **UNITED STATES DISTRICT COURT**
17 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

18 **LANA RAE RENNA, et al.,**
19 **Plaintiffs,**

20 **vs.**

21 **ROB BONTA, et al.,**
22 **Defendants.**

Case No.: 20-cv-2190-DMS-DEB

**DECLARATION OF
PLAINTIFF LEONARD RUEBE
IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION**

Date: October 7, 2022
Time: 1:30 p.m.
Department: 13A
Hon.: Dana M. Sabraw

23 I, Leonard Ruebe, declare as follows:

24 1. I am an adult resident of the County of Los Angeles County, California,
25 and am a named Plaintiff in the above matter. I have personal knowledge of the facts

1 stated herein, and if called as a witness, I could competently testify to these facts.

2 2. I am peaceable, law-abiding citizen who is not prohibited under state or
3 federal law from exercising my right to keep and bear arms.

4 3. I am a member of Plaintiffs Firearms Policy Coalition, Second
5 Amendment Foundation, Citizens Committee for the Right to Keep and Bear Arms,
6 and San Diego County Gun Owners PAC.

7 4. On September 28, 2022, the ban on Computerized Numerical Code
8 (“CNC”) milling machines went into effect under Assembly Bill No. 1621, generally
9 prohibiting the purchase, receipt, or possession of CNC machines whose sole or
10 primary function is to self-manufacture or self-assemble a firearm, including a
11 completed frame or receiver or a firearm precursor part.

12 5. As an ordinary, law-abiding person, I do not meet any of the exceptions
13 to the CNC Ban and I am therefore prohibited from purchasing, receiving, or
14 possessing any such machines under California Penal Code section 29185.

15 6. I am now subject to criminal prosecution and sanction under Penal Code
16 section 29185 for attempting to do so.

17 7. I previously acquired a CNC milling machine in or around 2017 in a
18 lawful purchase, which cost me approximately \$2,500.

19 8. The CNC machine facilitates the manufacture and assembly of some of
20 the most popular firearms in the country by assisting the user in efficiently and
21 properly finishing 80%-complete frames and receivers of such firearms.

22 9. I acquired the machine for purposes of undertaking multiple home-
23 based CNC manufacturing projects, including the self-manufacture and assembly of
24 firearms, and specifically handguns of popular types that are neither “dangerous”
25 nor “unusual” and that are commonly used for self-defense and other lawful
26 purposes.
27

28 10. But for California’s ban on the self-manufacture or assembly of

1 firearms that the State deems “unsafe” handguns, those homemade handguns would
2 include one or more handguns excluded from the State’s roster of “Handguns
3 Certified for Sale.”

4 11. However, because it is now illegal for me to possess or use such a
5 machine in the manufacture or assembly of firearms, I fear criminal prosecution and
6 sanction for any such continued possession or use of the machine.

7 12. Also, as a law-abiding person, I seek to comply with the law.

8 13. Consequently, on September 29, 2022, in compliance with the
9 dispossession mandate of Penal Code section 29185, I relinquished possession of my
10 CNC machine and any further ability to use it, by shipping it out of state and into the
11 possession of a third party where its possession is not prohibited.

12 14. But for the CNC Ban, I would retain possession and use of the CNC
13 machine at my residence in California for the otherwise lawful purposes that I had
14 acquired it.

15 15. The CNC machine is now inaccessible and of no use to me for these
16 purposes.

17 16. For so long as the California’s CNC Ban remains in effect, the CNC
18 machine will remain of no use to me for these purposes and I cannot lawfully acquire
19 or use another one for any such home-based manufacturing or assembly projects.
20

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

22 Executed on 10/01/2022.

23
24
25 
26 _____
LEONARD RUEBE