

C. D. Michel – SBN 144258  
[cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
Joshua Robert Dale – SBN 209942  
[jdale@michellawyers.com](mailto:jdale@michellawyers.com)  
Konstadinos T. Moros – SBN 306610  
[kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
Alexander A. Frank – SBN 311718  
[afrank@michellawyers.com](mailto:afrank@michellawyers.com)  
MICHEL & ASSOCIATES, P.C.  
180 E. Ocean Blvd., Suite 200  
Long Beach, CA 90802  
Telephone: (562) 216-4444  
Facsimile: (562) 216-4445  
[www.michellawyers.com](http://www.michellawyers.com)

Attorneys for Plaintiffs California Rifle & Pistol Association and Gun Owners of California, Inc.

Donald Kilmer-SBN 179986  
Law Offices of Donald Kilmer, APC  
14085 Silver Ridge Road  
Caldwell, Idaho 83607  
Telephone: (408) 264-8489  
Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

Attorney for Plaintiff Second Amendment Foundation

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

CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED;  
SECOND AMENDMENT  
FOUNDATION; GUN OWNERS OF  
CALIFORNIA, INC,

Plaintiffs,

v.

CITY OF GLENDALE; GLENDALE  
CHIEF OF POLICE CARL  
POVILAITIS, in his official capacity;  
GLENDALE CITY CLERK SUZIE  
ABAJIAN, in her official capacity; and  
DOES 1-10,

Defendants.

**CASE NO: 2:22-cv-07346-SB-JC**

**DECLARATION OF RICHARD  
MINNICH IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

**Hearing Date: December 2, 2022**

**Hearing Time: 8:30 a.m.**

**Courtroom: 6C**

**Judge: Hon. Stanley Blumenfeld Jr.**

**DECLARATION OF RICHARD MINNICH**

1  
2 1. I, Richard Minnich, am the Treasurer of the California Rifle & Pistol  
3 Association, Incorporated (CRPA), a plaintiff in the above-entitled action. I make  
4 this declaration of my own personal knowledge and, if called as a witness, I could  
5 and would testify competently to the truth of the matters set forth herein.

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

9 3. Founded in 1875, 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 rights to self-  
12 defense, the right to hunt, and the right to keep and bear arms. CRPA is also  
13 dedicated to promoting the shooting sports, providing education, training, and  
14 organized competition for adult and junior shooters. CRPA's members include law  
15 enforcement officers, prosecutors, professionals, firearm experts, and members of  
16 the public.

17 4. Many CRPA members in Southern California have valid and current  
18 concealed carry weapon ("CCW") permits, which enables them to lawfully carry a  
19 concealed firearm in public, so that they can defend themselves (and potentially  
20 others) with lethal force in the event of a life-threatening emergency situation.

21 5. Glendale Municipal Code generally bans possession on "city property" of  
22 any ammunition or firearm, whether loaded or unloaded. The term "city property"  
23 is defined to include effectively all public property within the City of Glendale, as  
24 well as some private property, with the only exception being streets/roads and  
25 sidewalks.

26 6. This includes, at minimum, 47 parks and recreation facilities, all City  
27 playgrounds, eight public libraries, three downtown parking structures and other  
28 City-owned or operated parking lots, the Glendale Civic Auditorium and civic

1 center complex, a youth center, an emergency center, undefined “open spaces” and  
2 “plazas”, and an unknowable amount of properties in the possession of private  
3 companies or individuals under contract with the city.

4 7. In sum, other than streets/roads and sidewalks, the Ordinance makes it  
5 unlawful for the typical, law-abiding person to possess a firearm or ammunition on  
6 any public property (or publicly controlled property) in the City of Glendale.

7 8. Glendale’s Ordinance most burdens CRPA members who either live in  
8 Glendale or travel to the City on a regular basis. It prevents them from carrying in  
9 non-sensitive places where they should be allowed to do so based on the Supreme  
10 Court’s recent landmark ruling in *New York State Rifle & Pistol Association v.*  
11 *Bruen*. The result is that the utility of their CCWs permit, and thus their right to be  
12 armed for self-defense in public, is severely curtailed or outright eliminated when  
13 they visit the City of Glendale.

14 9. Moreover, many CRPA members would likely not even *know* they are  
15 breaking the law, because Glendale has no requirement mandating that places  
16 where firearm possession is prohibited post signs saying so. CRPA members, like  
17 all other citizens who legally carry, would have little reason to assume that they are  
18 not allowed to carry in, for example, a parking structure, a library, or a park. They  
19 thus may find themselves in legal jeopardy if they are ever caught with a firearm  
20 they had no idea they were not allowed to possess at a particular city-owned  
21 location.

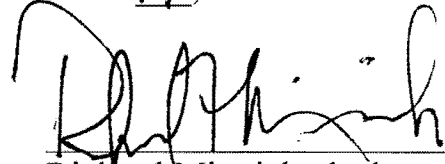
22 10. This is an especially precarious situation for CRPA members with carry  
23 permits who *don’t* live in or regularly go to Glendale, but do go there from time to  
24 time. Such individuals are even less likely to be aware of Glendale’s Ordinance  
25 given their limited interaction with the City.

26 11. In sum, Glendale’s Ordinance violates the Second Amendment by restricting  
27 the right to carry in clearly non-sensitive places, with no exception for people who  
28 have a CCW permit. This law negatively affects CRPA members who have CCW

1 permits and live in Glendale or visit the City, especially those who have no idea  
2 that they are breaking the law because they are not on notice that they are doing so.

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

4 Executed within in the United States on October 19, 2022.

5  
6  
7 

8 Richard Minnich, declarant  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28