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

13 KIM RHODE, et al.,

14 Plaintiffs,

15 v.

16 ROB BONTA, in his official capacity as  
17 Attorney General of the State of  
18 California,

19 Defendant.

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

**DECLARATION OF RICHARD  
MINNICH ON BEHALF OF  
PLAINTIFF CALIFORNIA RIFLE &  
PISTOL ASSOCIATION,  
INCORPORATED**

**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 this action. I make this declaration of my  
4 own personal knowledge and, if called as a witness, I could and would testify  
5 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 California,  
8 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 the  
11 constitutional and statutory rights of gun ownership, including the rights 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. CRPA's members include law enforcement officers,  
15 prosecutors, professionals, firearm experts, and members of 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. I am aware of many CRPA members who have been harmed by California's  
22 ammunition sales restrictions being challenged in this action ("the Challenged Laws").

23 6. I am aware of CRPA members who have been refused an ammunition sale  
24 because their driver's license or identification card has a "FEDERAL LIMITS APPLY"  
25 notation and they lacked the required supplemental documentation.

26 7. I am aware of CRPA members who have been rejected an ammunition  
27 transaction, even though they were not prohibited from acquiring ammunition or firearms  
28 under any state or federal laws, and do not know that the CFARS website exists.

1           8.     I am aware of CRPA members who have been rejected an ammunition  
2 transaction, even though they were not prohibited from acquiring ammunition or firearms  
3 under any state or federal laws, and because they were either unaware of the steps that  
4 they could take to overcome their rejection or alternative options to qualify for an  
5 ammunition purchase, or could not figure out how to update their records in the CFARS  
6 website, they gave up on trying to lawfully purchase ammunition in California.

7           9.     I am aware of CRPA members who have been rejected an ammunition  
8 transaction, even though they were not prohibited from acquiring ammunition or firearms  
9 under any state or federal laws, and decided to purchase a firearm that they would not  
10 have otherwise purchased because they either believed it was their only option to get into  
11 DOJ's system to be able to buy ammunition or to avoid having to pay the \$19 Basic  
12 Check every time they purchased ammunition.

13          10.    I am aware of CRPA members who have been rejected an ammunition  
14 transaction, even though they were not prohibited from acquiring ammunition or firearms  
15 under any state or federal laws, and because they could not determine how to correct  
16 issues with their AFS records on the CFARS website, have had to request a copy of their  
17 AFS records from DOJ and have reported waiting months for DOJ to respond with a  
18 copy of their AFS records.

19          11.    I am aware of CRPA members who acquire ammunition outside of  
20 California, particularly on hunting trips, competitions, or training events, and leave it  
21 behind because it is impractical and costly to have it shipped to a licensed vendor in  
22 California to process.

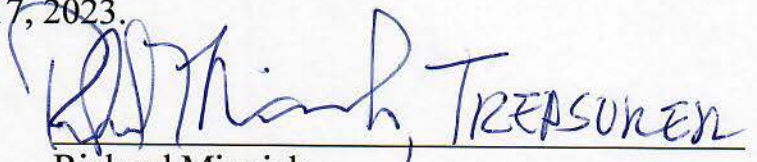
23          12.    I am aware of CRPA members who are not California residents and because  
24 they are not, have been unable to purchase ammunition from a licensed vendor while  
25 visiting California.

26          13.    I am aware of CRPA members who must pay significant fees to a licensed  
27 California ammunition vendor to process ammunition transfers from out-of-state vendors  
28

1 for ammunition that the members could not locate in-state, which costs they would not  
2 have incurred if the Challenged Laws did not prohibit direct shipping to their homes.

3 14. I am aware of CRPA members who have had licensed California  
4 ammunition vendors refuse to process their ammunition transfers from out-of-state  
5 vendors, as required under the Challenged Laws for a California resident to receive  
6 ammunition from an out-of-state vendor.

7  
8 I declare under penalty of perjury that the foregoing is true and correct. Executed  
9 within in the United States on August 17, 2023.

10  TREASURER

11 Richard Minnich  
12 Declarant  
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**CERTIFICATE OF SERVICE**  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

Case Name: *Rhode, et al. v. Bonta*  
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 MINNICH ON BEHALF OF PLAINTIFF  
CALIFORNIA RIFLE & PISTOL ASSOCIATION, INCORPORATED**

on the following parties by electronically filing the foregoing on August 17, 2023, with the Clerk of the District Court using its ECF System, which electronically notifies them.

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San Francisco, CA 94102-7004  
*Attorneys for Defendant Attorney  
General Rob Bonta*

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 17, 2023, at Long Beach, CA.

  
Laura Palmerin