

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

|  |   |                     |
|--|---|---------------------|
| DAVID J. RADICH and LI-RONG RADICH,      | ) |                     |
|  | ) |                     |
| Plaintiffs,                              | ) |                     |
|  | ) |                     |
| v.                                       | ) | Case No. 1:14-CV-20 |
|  | ) |                     |
| JAMES C. DELEON GUERRERO, in his         | ) |                     |
| official capacity as Commissioner of the | ) |                     |
| Department of Public Safety of the       | ) |                     |
| Commonwealth of Northern Marianas        | ) |                     |
| Islands,                                 | ) |                     |
|  | ) |                     |
| Defendant.                               | ) |                     |

**DECLARATION OF DAVID J. RADICH**

I, DAVID J. RADICH, am competent to state, and declare the following based on my own personal knowledge:

1. I am one of the Plaintiffs in the above-captioned matter.

2. I was born in California, and I am a United States citizen. I am also an honorably discharged United States Navy veteran who served in the Gulf War. I was formerly a teacher in the Detroit Public School system in Michigan before moving to Tinian, CNMI to work for the Public School system there, and then I moved to Saipan in 2008 to work for an environmental consulting firm. I have been married to my wife Li-Rong since 2009.

3. I have been and continue to be extremely concerned about the self-defense of my wife and myself. In 2010, while I was away and Li-Rong was at home alone, our home was invaded and Li-Rong was attacked and beaten, resulting in injuries including two broken ribs, facial contusions, and a suspected broken orbital bone and eye socket. She eventually recovered physically, but both she and I incurred medical bills for Li-Rong's care.

4. CNMI's prohibition on my possession a handgun significantly limits my ability to protect my family and myself in the event of violence. At the same time, my inability (due to CNMI law) to obtain a Weapons Identification Card (WIC) for self-defense purposes significantly limits my ability to protect my family and myself in the event of violence.

5. On or about July 31, 2013, Li-Rong and I applied to the CNMI Department of Public Safety for a WIC.

6. In the 60 days following our application, we received neither a WIC nor a denial.

7. In early-September, 2013, I contacted the Defendant's office regarding Li-Rong's and my still-pending WIC applications, and a representative told me that our applications were being reviewed by the Attorney General's office.

8. As of the date of this Declaration, my wife and I have still not had our WIC applications approved or denied.

9. The Defendant has denied my wife and me the ability to legally register and possess handguns for immediate self-defense.

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

Executed this \_\_\_\_\_ day of January, 2015.

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David J. Radich

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Executed this 9<sup>TH</sup> day of January, 2015.



David J. Radich