



January 16, 2019

Via US Mail and Email

Justin Wold
Store Manager
Ammo Brothers
1554 Brookhollow Dr. B
Santa Ana CA, 92705
SantaAna@AmmoBros.com

Dear Mr. Wold,

I am an attorney with the Council on American-Islamic Relations, Greater Los Angeles Area Chapter (CAIR-LA). CAIR-LA is a nonprofit American Muslim civil rights advocacy organization with the mission to enhance the understanding of Islam, protect civil rights, promote justice and empower American Muslims.

I am writing because my office has received reports that your store displays and sells window decals and bumper stickers that contain Islamophobic sentiments. Specifically, these stickers contain anti-Muslim statements, which seek to target and demonize Muslims because of their religion. There are multiple stickers which refer to "infidels" and one that depicts a "pork eating crusader". These each have the purpose of targeting Islam and expressing disdain and intolerance towards the religion. The context that these are displayed in a gun store is particularly problematic since the stickers serve to incite anti-Muslim sentiment and promote violence against Muslims. The targeting of individuals due to their religion is against both federal and state law. Illegal action that targets individuals due to religion, or ethnicity or national origin, qualifies as a hate crime.

The solicitation of a crime of violence is a federal offense and applies to an individual or entity that induces or "otherwise endeavors to persuade" another to violence. *See 18 U.S. Code § 373*. Notably, speech that incites or produces lawless action is not protected under the First Amendment. Both legal provisions would function to subject your store to liability, should one of your patrons take violent action against a Muslim or the Muslim community.

Moreover, your store is in violation of California's Bane Act, which protects individuals from threats, intimidation, or coercion, which interferes with their state or federal statutory and constitutional rights. *See California Civil Code §52.1*. For example, Ammo Brothers could be charged with violating the Bane Act if a Muslim entered the store intending to make a purchase, viewed the stickers and became intimidated and concerned about his safety, and felt it necessary to leave the store without making his intended purpose. Penalties for violating the Bane Act include minimum damages of \$1,000, injunctive relief, and attorney fees, among others.



Council on American-Islamic Relations

Los Angeles Area Chapter

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Ammo Brother's display and sale of anti-Muslim stickers also violates California's Ralph Act, which provides that individuals have the right to be free of discriminatory violence and threats against themselves and their property. *See California Civil Code §§ 51.7 and 52(b)*. The Ralph Act provides penalties for any individual or entity who commits threats or violence against another motivated by the victim's religion or national origin, among others. These penalties include damages to compensate the victim for harm, punitive damages, and a civil penalty of \$25,000.

CAIR-LA strongly urges you to immediately remove all stickers, decals, and other items displaying an anti-Muslim or Islamophobic sentiment from your store. Should you fail to do so, and we learn that the products have led to harm or otherwise injured an individual's rights because of their Islamophobic sentiment, we will not hesitate to pursue legal action to the full extent possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Pat Shnell".

Patricia Shnell, Esq.

Civil Rights Attorney

Council on American-Islamic Relations

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