



Ventana Wildlife Society

Conserving Native Wildlife and their Habitats

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October 21, 2025

Clerk of Court
U.S. Court of Appeals for the Ninth Circuit
P.O. Box 193939
San Francisco, CA 94119-3939

Re: Request for Issuance of Mandate – *Rhode v. Bonta*, No. 20-55437

Dear Honorable Judges and Clerk of Court,

As Executive Director of Ventana Wildlife Society, I respectfully urge the Ninth Circuit Court of Appeals to issue its mandate in *Rhode v. Bonta* without further delay. Every day that the mandate remains pending, hunters and ranchers in California remain unable to purchase non-lead ammunition online—a condition that continues to harm wildlife, particularly the endangered California condor.

California law requires the use of non-lead ammunition for hunting, yet the state also limits online or mail-order ammunition sales under Penal Code §§ 30312 and 30314. This dual policy has made non-lead ammunition, especially in small calibers, nearly impossible to obtain across much of the state. Hunters and ranchers who wish to comply with the non-lead requirement often cannot, leaving them few legal, practical options. The result is continued deposition of lead fragments in the environment, which scavengers ingest when feeding on lead-shot carcasses. Lead poisoning remains the primary cause of mortality in the California condor and affects numerous other species.

Your Court's ruling in *Rhode v. Bonta* recognized that the state's face-to-face ammunition-purchase requirement is unconstitutional under the Second Amendment. Until the mandate issues, however, that unconstitutional barrier remains in effect—impeding lawful commerce and undermining conservation progress. Prompt issuance of the mandate would remove a critical obstacle to non-lead ammunition access, aligning legal reality with the shared goal of eliminating unintended lead poisoning in wildlife.

On behalf of responsible hunters, ranchers, and all who care about wildlife conservation, I respectfully urge the Ninth Circuit to pass down its mandate without further delay. Thank you for your attention and your continued service in upholding both constitutional rights and the public interest.

Respectfully,

Kelly Sorenson
Executive Director

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