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Attorneys for Plaintiffs

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

CALIFORNIA RIFLE & PISTOL
 ASSOCIATION, INCORPORATED; THE
 SECOND AMENDMENT FOUNDATION;
 GUN OWNERS OF AMERICA, INC.;
 GUN OWNERS FOUNDATION; GUN
 OWNERS OF CALIFORNIA, INC.; ERICK
 VELASQUEZ, an individual; CHARLES
 MESSEL, an individual; BRIAN WEIMER,
 an individual; CLARENCE RIGALI, an
 individual; KEITH REEVES, an individual,
 CYNTHIA GABALDON, an individual; and
 STEPHEN HOOVER, an individual,

Plaintiffs,

v.

LOS ANGELES COUNTY SHERIFF'S
 DEPARTMENT; SHERIFF ROBERT
 LUNA, in his official capacity; LA VERNE
 POLICE DEPARTMENT; LA VERNE
 CHIEF OF POLICE COLLEEN FLORES,
 in her official capacity; ROBERT BONTA,
 in his official capacity as Attorney General
 of the State of California and DOES 1-10,

Defendants.

CASE NO: 8:23-cv-10169-SPG
 (ADSx)

**DECLARATION OF
 KONSTADINOS T. MOROS IN
 SUPPORT OF PLAINTIFFS'
 MOTION FOR PRELIMINARY
 INJUNCTION**

Hearing Date: March 13, 2024
 Hearing Time: 1:30 p.m.
 Courtroom: 5C
 Judge: Hon. Sherilyn Peace Garnett

1 I, Konstadinos T. Moros, declare:

2 1. I am a member of the bar of the State of California. I am an attorney at
3 law duly licensed to practice in the State of California and before the District Court
4 for the Central District of California. I am counsel of record for Plaintiffs in this
5 action. I submit this declaration in support of Plaintiffs' Motion for Preliminary
6 Injunction in this matter. I have personal knowledge of the facts stated below, and if
7 I were to be called as a witness, I could and would competently testify under oath as
8 to the matters herein.

9 2. On January 16, 2024, I emailed Monica Choi Arredondo, Bruce A.
10 Lindsay, and Sandra K. Sandoval, counsel for the La Verne Police Department and
11 La Verne Chief of Police Colleen Flores, to inquire whether the La Verne Police
12 Department intended to raise the psychological exam fee from \$150 to \$400. On
13 January 25, I received a response that the City's contractor had indeed increased the
14 fee, but passing the increased cost to applicants would require City Council
15 approval. It is not yet clear whether the City Council intends to vote to pass that
16 expense onto applicants.

17 3. On January 24, 2024, , I visited Cumberland County's webpage titled
18 "License to Carry Firearms", located at [https://www.cumberlandcountypa.gov/](https://www.cumberlandcountypa.gov/3094/License-to-Carry-Firearms)
19 [3094/License-to-Carry-Firearms](https://www.cumberlandcountypa.gov/3094/License-to-Carry-Firearms). A true and correct copy of that webpage, as it
20 appeared when I retrieved it online, is attached as Exhibit A to Plaintiffs' Request
21 for Judicial Notice.

22 4. On January 23, 2024, I visited the MyCCW webpage for the La Verne
23 Police Department. MyCCW is a contractor working with the La Verne Police
24 Department to process all CCW permit applicants. The webpage, located at
25 <https://myccw.us/departments/La-Verne-Police-Department>, links to a fee schedule
26 that is available at [https://docs.google.com/document/d/1g_oOI4RbXAmUa3](https://docs.google.com/document/d/1g_oOI4RbXAmUa3SiqwhFTvlBaY5ZIs_VOUtSdQocOEU/preview)
27 [SiqwhFTvlBaY5ZIs_VOUtSdQocOEU/preview](https://docs.google.com/document/d/1g_oOI4RbXAmUa3SiqwhFTvlBaY5ZIs_VOUtSdQocOEU/preview). A true and correct copy of that fee
28 schedule, as it appeared when I retrieved it online, is attached as Exhibit B to

1 Plaintiffs' Request for Judicial Notice.

2 5. On January 23, 2024, I visited the Arizona Department of Public
3 Safety's Concealed Weapons and Permits webpage, located at [https://www.azdps.
4 gov/services/public/cwp](https://www.azdps.gov/services/public/cwp). A true and correct copy of that webpage, as it appeared
5 when I retrieved it online, is attached as Exhibit C to Plaintiffs' Request for Judicial
6 Notice.

7 6. On January 23, 2024, I visited the Texas Department of Public
8 Safety's Licensing and Registration webpage. That webpage, located at
9 <https://www.dps.texas.gov/section/handgun-licensing/licensing-registration>,
10 contains a link to a License to Carry Fee Table. A true and correct copy of that fee
11 table, as it appeared when I retrieved it online, is attached as Exhibit D to Plaintiffs'
12 Request for Judicial Notice.

13 7. On January 23, 2024, I visited the Utah Department of Public Safety's
14 webpage titled "How do I apply for a Concealed Firearm Permit?", located at
15 [https://bci.utah.gov/concealed-firearm/how-do-i-apply-for-a-concealed-firearm-
16 permit](https://bci.utah.gov/concealed-firearm/how-do-i-apply-for-a-concealed-firearm-permit). A true and correct copy of that webpage, as it appeared when I retrieved it
17 online, is attached as Exhibit E to Plaintiffs' Request for Judicial Notice.

18 8. On January 23, 2024, I visited the Washington Department of
19 Licensing's webpage titled "Fees, Firearm Dealers", located at
20 [https://www.dol.wa.gov/professional-licenses/firearms-dealers/fees-firearms-
21 dealers](https://www.dol.wa.gov/professional-licenses/firearms-dealers/fees-firearms-dealers). A true and correct copy of that webpage, as it appeared when I retrieved it
22 online, is attached as Exhibit F to Plaintiffs' Request for Judicial Notice.

23 9. On January 23, 2024, I visited the Los Angeles County Sheriff's
24 Department's Permitium webpage, located at <https://lasd.permitium.com/entry>.
25 Permitium is a software service used by the Los Angeles County Sheriff's
26 Department to process CCW permit applications. A true and correct copy of that
27 webpage, as it appeared when I retrieved it online, is attached as Exhibit G to
28 Plaintiffs' Request for Judicial Notice.

1 10. On January 23, 2024, I visited the Glendora Police Department's
2 Permitium webpage, located at <https://glendorapdca.permitium.com/ccw/start>.
3 Permitium is a software service used by the Glendora Police Department to process
4 CCW permit applications. A true and correct copy of that webpage, as it appeared
5 when I retrieved it online, is attached as Exhibit H to Plaintiffs' Request for Judicial
6 Notice.

7 11. On January 23, 2024, I visited the La Verne Police Department's CCW
8 webpage, located at <https://www.lvpd.org/#Home/> From there, I retrieved
9 information distributed by LVPD about the required psychological assessment,
10 available online directly in PDF form at [https://www.lvpd.org/uploads/](https://www.lvpd.org/uploads/Psychological%20Assesment.pdf)
11 [Psychological%20Assesment.pdf](https://www.lvpd.org/uploads/Psychological%20Assesment.pdf). A true and correct copy of that PDF, as it
12 appeared when I retrieved it online, is attached as Exhibit I to Plaintiffs' Request
13 for Judicial Notice.

14 12. On January 24, 2024, I visited Duke University's Center for Firearms
15 Law website, which contains a repository of historical gun laws. There, I retrieved a
16 copy of: Fred L. Button, ed., General Municipal Ordinances of the City of Oakland,
17 California (Oakland, CA; Enquirer, 1895), p. 218, Sec. 1, An Ordinance to Prohibit
18 the Carrying of Concealed Weapons, No. 1141. The webpage for that ordinance in
19 Duke's repository can be found at: [https://firearmslaw.duke.edu/laws/fred-l-button-](https://firearmslaw.duke.edu/laws/fred-l-button-ed-general-municipal-ordinances-of-the-city-of-oakland-california-oakland-ca-enquirer-1895-p-218-sec-1-an-ordinance-to-prohibit-the-carrying-of-concealed-weapons-no-1141)
20 [ed-general-municipal-ordinances-of-the-city-of-oakland-california-oakland-ca-](https://firearmslaw.duke.edu/laws/fred-l-button-ed-general-municipal-ordinances-of-the-city-of-oakland-california-oakland-ca-enquirer-1895-p-218-sec-1-an-ordinance-to-prohibit-the-carrying-of-concealed-weapons-no-1141)
21 [enquirer-1895-p-218-sec-1-an-ordinance-to-prohibit-the-carrying-of-concealed-](https://firearmslaw.duke.edu/laws/fred-l-button-ed-general-municipal-ordinances-of-the-city-of-oakland-california-oakland-ca-enquirer-1895-p-218-sec-1-an-ordinance-to-prohibit-the-carrying-of-concealed-weapons-no-1141)
22 [weapons-no-1141](https://firearmslaw.duke.edu/laws/fred-l-button-ed-general-municipal-ordinances-of-the-city-of-oakland-california-oakland-ca-enquirer-1895-p-218-sec-1-an-ordinance-to-prohibit-the-carrying-of-concealed-weapons-no-1141). A true and correct copy of the ordinance is attached as Exhibit J
23 to Plaintiffs' Request for Judicial Notice.

24 13. On January 24, 2024, I visited Duke University's Center for Firearms
25 Law website, which contains a repository of historical gun laws. There, I retrieved a
26 copy of: Prohibiting the Carrying of Concealed Deadly Weapons, Ordinance no. 84,
27 Charter and Ordinances of the City of Sacramento (1876). The webpage for that
28 ordinance in Duke's repository can be found at: <https://firearmslaw.duke.edu/>

1 [laws/prohibiting-the-carrying-of-concealed-deadly-weapons-ordinance-no-84-](#)
2 [charter-and-ordinances-of-the-city-of-sacramento-1876](#). A true and correct copy of
3 the ordinance is attached as Exhibit K to Plaintiffs' Request for Judicial Notice.

4 I declare under penalty of perjury of the laws of the State of California and
5 the United States that the foregoing is true and correct. Executed within the United
6 States on January 26, 2024.

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8 */s/Konstadinos T. Moros*
Konstadinos T. Moros, declarant
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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *California Rifle and Pistol Association, et al., v. Los Angeles County Sheriff's Dept., et al.*

Case No.: 8:23-cv-10169-SPG (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**DECLARATION OF KONSTADINOS T. MOROS IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

on the following parties, as follows:

Mark R Beckington
Jane E. Reilley
Christina R.B. Lopez, Deputy Attorney General
California Department of Justice
Office of the Attorney General
300 South Spring Street, Suite 1702
Los Angeles, CA 90013-1230
jane.reilley@doj.ca.gov
Christina.Lopez@doj.ca.gov
Attorney for Defendants

by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Additionally, the following parties were served by transmitting a true copy via electronic mail as follows:

Dawyn R. Harrison, County Counsel
Caroline Shahinian, Deputy County Counsel
Office of the County Counsel
500 W Temple St Ste 648
Los Angeles, CA 90012-3196
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*Attorneys for Defendants Los Angeles
County Sheriff's Department and Sheriff
Robert Luna*

Bruce A. Lindsay
Monica Choi Arredondo
JONES MAYER
3777 N. Harbor Blvd.
Fullerton, CA 92835
bal@jones-mayer.com
mca@jones-mayer.com

*Attorneys for Defendants La
Verne Police Department and La
Verne Chief of Police Colleen
Flores*

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

2 Executed January 26, 2024

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4 Christina Castron

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