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Attorneys for Plaintiffs

**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 CYNTHIA
 GABALDON IN SUPPORT OF
 PLAINTIFFS' MOTION FOR
 PRELIMINARY INJUNCTION**

42 U.S.C. §§ 1983 & 1988

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

DECLARATION OF CYNTHIA GABALDON

1. I, Cynthia Gabaldon, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of Los Angeles County, California and reside within the City of La Verne.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

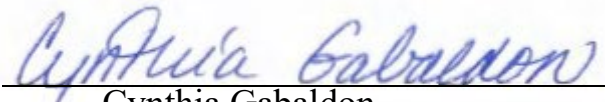
4. I have owned and trained with firearms for most of my life.

5. Encouraged by the Supreme Court's ruling in *Bruen*, I decided it was time to obtain a CCW permit. Unfortunately, the exorbitant fees La Verne charges have dissuaded me from applying. I am self-employed and have a son in college, so an extra \$1,000 expense is too much for me at this time. I am thus priced out of a constitutional right.

6. On principle, I also do not want to subject myself to the psychological examination requirement, something that most issuing authorities in California (including LASD) do not require.

7. I hope this Court will force La Verne to reduce its fees and drop its psychological examination. I am also willing to instead obtain an Arizona CCW permit, which is far more affordable, if this Court orders California to honor the permits of other states.

I declare under penalty of perjury that the foregoing is true and correct.
Executed within the United States on January 12, 2024.


Cynthia Gabaldon
Declarant

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 CYNTHIA GABALDON 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
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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:

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

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

Executed January 26, 2024


Christina Castron