

C. D. Michel – SBN 144258
cmichel@michellawyers.com
 Joshua Robert Dale – SBN 209942
jdale@michellawyers.com
 Konstadinos T. Moros – SBN 306610
kmoros@michellawyers.com
 Alexander A. Frank – SBN 311718
afrank@michellawyers.com
 MICHEL & ASSOCIATES, P.C.
 180 E. Ocean Blvd., Suite 200
 Long Beach, CA 90802
 Telephone: (562) 216-4444

Donald Kilmer-SBN 179986
 Law Offices of Donald Kilmer, APC
 14085 Silver Ridge Road
 Caldwell, Idaho 83607
 Telephone: (408) 264-8489
 Email: Don@DKLawOffice.com

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 DAVID
 BROADY 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 DAVID BROADY

I, David Broady, declare as follows:

1. I am a resident of Nevada, and make this Declaration stating my personal knowledge of the following set forth herein.

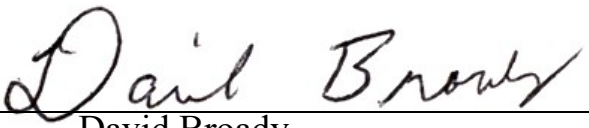
2. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or any state. I am a member of the California Rifle & Pistol Association, a plaintiff in this matter.

3. I am a retired California prosecutor, last working as a Senior Deputy District Attorney for the Placer County DA's office from 1995 to 2020. Before that, I worked in the Riverside County DA's office from 1991 to 1995. I had California CCW permits in Riverside County and later Placer County, from the early 1990s until 2020 when I moved to Nevada. Since then I have had a Nevada CCW permit, but I cannot obtain a California CCW permit to allow me to exercise my right to carry in the Golden State. California also will not honor my Nevada permit.

4. I frequently am in California because I still own property in Placer County, and I visit family in the foothills, the Bay Area and San Diego. I also remain an active member of both the California and Nevada State Bars.

5. I urge this Court to grant Plaintiffs' requested motion for preliminary injunction and force California to honor my Nevada CCW permit. Alternatively, California should at least allow me to apply to obtain a California CCW permit, so I can once again carry in the state as I did for almost 30 years. But should the Court decide to go that route, I hope it requires California to have a quick and affordable process, I should not have to wait many months and pay high fees just to exercise a constitutional right I already have a permit for in another state.

1 I declare under penalty of perjury that the foregoing is true and correct.
2 Executed within the United States on January 15, 2024.

3
4 
5 David Broady
6 Declarant
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 DAVID BROADY 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
cshahinian@counsel.lacounty.gov

*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
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury that the foregoing is true and correct.
Executed January 26, 2024


Christina Castron