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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 KEITH
 REEVES 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 KEITH REEVES

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

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

7 3. I am a law-abiding adult who is not prohibited from owning firearms under
8 the laws of the United States of America or the state of California. I am a member
9 of the California Rifle & Pistol Association, the Second Amendment Foundation,
10 and Gun Owners of America, all of which are also plaintiffs in this matter.

11 4. I possess both Arizona and Utah CCW permits, both of which required
12 background checks and safety courses to obtain. These permits are, without any
13 good reason, not honored by California. I am also an NRA-certified pistol instructor
14 and range safety officer.

15 5. I applied for a CCW permit in January 2014 with La Verne Police
16 Department, and was denied in May 2015 because he was deemed to lack sufficient
17 “good cause,” a criterion the Supreme Court struck down in *Bruen* seven years
18 later. I wish to reapply for a permit but cannot afford to do so due to the excessive
19 application and issuance fees charged by La Verne. Paired with the cost of training
20 and livescan, I will have to spend around \$1,000 or more to exercise this
21 constitutional right.

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

25 7. I hope this Court will force La Verne to reduce its fees and drop its
26 psychological examination, or in the alternative, force California to honor my
27 Arizona and Utah CCW permits.

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



Keith Reeves
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 KEITH REEVES IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY INJUNCTION**

on the following parties, as follows:

Mark R Beckington
Jane E. Reilley
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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 Castro