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20 **UNITED STATES DISTRICT COURT**  
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 CALIFORNIA RIFLE & PISTOL  
23 ASSOCIATION, INCORPORATED; THE  
24 SECOND AMENDMENT FOUNDATION;  
25 GUN OWNERS OF AMERICA, INC.;  
26 GUN OWNERS FOUNDATION; GUN  
27 OWNERS OF CALIFORNIA, INC.;  
28 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)

**REQUEST FOR JUDICIAL  
NOTICE 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 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Under Federal Rule of Evidence 201, Plaintiffs California Rifle & Pistol  
3 Association, Incorporated, The Second Amendment Foundation, Gun Owners of  
4 America, Inc., Gun Owners Foundation, Gun Owners of California, Inc., Erick  
5 Velasquez, Charles Messel, Brian Weimer, Clarence Rigali, Keith Reeves, Cynthia  
6 Gabaldon, and Stephen Hoover request that the Court take judicial notice of the  
7 following documents in support of Plaintiffs' Motion for Preliminary Injunction:

8 1. **Cumberland County, Pennsylvania License to Carry Firearms**  
9 **Webpage.** A true and correct copy of this document is attached as **Exhibit A.**  
10 Exhibit I is a webpage maintained by the local government of Cumberland County  
11 Pennsylvania and pertains to their procedures for issuing CCW permits. It is  
12 available online at [https://www.cumberlandcountypa.gov/3094/License-to-Carry-](https://www.cumberlandcountypa.gov/3094/License-to-Carry-Firearms)  
13 [Firearms](https://www.cumberlandcountypa.gov/3094/License-to-Carry-Firearms) (last visited Jan. 24, 2024).

14 2. **La Verne Police Department CCW Fee Schedule.** A true and correct  
15 copy of this document is attached as **Exhibit B.** Exhibit B is the fee schedule  
16 maintained my MyCCW, a contractor working with the La Verne Police  
17 Department to process all CCW permit applicants, and is available online at  
18 [https://docs.google.com/document/d/1g\\_oOI4RbXAmUa3SiqwhFTvlBaY5ZIs\\_VO](https://docs.google.com/document/d/1g_oOI4RbXAmUa3SiqwhFTvlBaY5ZIs_VO)  
19 [UtSdQocOEU/preview](https://docs.google.com/document/d/1g_oOI4RbXAmUa3SiqwhFTvlBaY5ZIs_VO) (last visited Jan. 23, 2024).

20 3. **Arizona Department of Public Safety Concealed Weapons and**  
21 **Permits Webpage.** A true and correct copy of this document is attached as **Exhibit**  
22 **C.** Exhibit C is a website maintained by the government of the State of Arizona,  
23 and is available online at <https://www.azdps.gov/services/public/cwp> (last visited  
24 Jan. 23, 2024). The website includes a fee schedule of the fees charged for CCW  
25 permit applications.

26 4. **Texas Department of Public Safety, License to Carry (LTC) Fee**  
27 **Table.** A true and correct copy of this document is attached as **Exhibit D.** Exhibit  
28 D is retrievable from a website maintained by the government of the State of Texas,

1 and is available online at [https://www.dps.texas.gov/section/handgun-](https://www.dps.texas.gov/section/handgun-licensing/licensing-registration)  
2 [licensing/licensing-registration](https://www.dps.texas.gov/section/handgun-licensing/licensing-registration) (last visited Jan. 23, 2024), by clicking the “fee  
3 schedule” link on that page.

4       5.     **Utah Department of Public Safety – “How do I apply for a**  
5 **Concealed Firearm Permit?” Webpage.** A true and correct copy of this document  
6 is attached as **Exhibit E**. Exhibit E is a website maintained by the government of  
7 the State of Utah, and is available online at [https://bci.utah.gov/concealed-](https://bci.utah.gov/concealed-firearm/how-do-i-apply-for-a-concealed-firearm-permit)  
8 [firearm/how-do-i-apply-for-a-concealed-firearm-permit](https://bci.utah.gov/concealed-firearm/how-do-i-apply-for-a-concealed-firearm-permit) (last visited Jan. 23, 2024).  
9 The website includes a fee schedule of the fees charged for CCW permit  
10 applications.

11       6.     **Washington Department of Licensing – Fees, Firearm Dealers**  
12 **Webpage.** A true and correct copy of this document is attached as **Exhibit F**.  
13 Exhibit F is a website maintained by the government of the State of Washington,  
14 and is available online at [https://www.dol.wa.gov/professional-licenses/firearms-](https://www.dol.wa.gov/professional-licenses/firearms-dealers/fees-firearms-dealers)  
15 [dealers/fees-firearms-dealers](https://www.dol.wa.gov/professional-licenses/firearms-dealers/fees-firearms-dealers) (last visited Jan. 23, 2024). The website includes a fee  
16 schedule of the fees charged for CCW permit applications.

17       7.     **Los Angeles County Sheriff’s Department Concealed Carry**  
18 **Weapon License, Permitium.** A true and correct copy of this document is attached  
19 as **Exhibit G**. Exhibit G is a webpage maintained by Permitium, a software service  
20 used by the Los Angeles County Sheriff’s Department to process CCW permit  
21 applications, and is available online at <https://lasd.permitium.com/entry> (last visited  
22 Jan. 23, 2024).

23       8.     **Glendora Police Department License to Carry a Concealed**  
24 **Weapon, Permitium.** A true and correct copy of this document is attached as  
25 **Exhibit H**. Exhibit H is a webpage maintained by Permitium, a software service  
26 used by the Glendora Police Department to process CCW permit applications, and  
27 is available online at <https://glendorapdca.permitium.com/ccw/start> (last visited Jan.  
28 23, 2024).

1           9.     **La Verne Police Department Information on Psychological**  
2 **Assessment.** A true and correct copy of this document is attached as **Exhibit I.**  
3 Exhibit I is information on La Verne’s psychological examination required of all  
4 CCW permit applicants and was published by the La Verne Police Department. It is  
5 available online at <https://www.lvpd.org/uploads/Psychological%20Assesment.pdf>  
6 (last visited Jan. 23, 2024).

7           10.    **Fred L. Button, ed., General Municipal Ordinances of the City of**  
8 **Oakland, California (Oakland, CA; Enquirer, 1895), p. 218, Sec. 1, An**  
9 **Ordinance to Prohibit the Carrying of Concealed Weapons, No. 1141.** A true  
10 and correct copy of this document is attached as **Exhibit J.** Exhibit J is a copy of a  
11 historical ordinance from the City of Oakland that was enacted in 1890.

12           11.    **Prohibiting the Carrying of Concealed Deadly Weapons,**  
13 **Ordinance no. 84, Charter and Ordinances of the City of Sacramento (1876).**  
14 A true and correct copy of this document is attached as **Exhibit K.** Exhibit K is a  
15 copy of a historical ordinance from the City of Sacramento that was enacted in  
16 1876.

17           A court shall take judicial notice of such a fact if requested by a party and  
18 supplied with the necessary information. *See* Fed. R. Evid. 201(d). Judicial notice  
19 of Exhibits A through K is proper because the documents for which this request is  
20 made are “capable of accurate and ready determination by resort to sources who  
21 accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b)(2). Indeed, “[a]  
22 trial court may presume that public records are authentic and trustworthy.”  
23 *Gilbrook v. City of Westminster*, 177 F.3d 839, 858 (9th Cir. 1999) (taking judicial  
24 notice of agency report).

25           Most of these exhibits are either directly from government websites, or the  
26 websites of contractors working with those governments to handle CCW permit  
27 application processing. “[A] court can take judicial notice of a government's  
28 website.” *EVO Brands, LLC v. Al Khalifa Grp. LLC*, 657 F. Supp. 3d 1312, 1321

1 (C.D. Cal. 2023), citing *Daniels–Hall v. National Education Association*, 629 F.3d  
2 992, 999 (9th Cir. 2010) (taking judicial notice of information on the websites of  
3 two school districts because they were government entities).

4 As for the two historical ordinances cited from the nineteenth century, those  
5 are also subject to judicial notice. See *Baird v. Bonta*, No. 2:19-CV-00617-KJM-  
6 AC, 2023 WL 9050959, at \*7 (E.D. Cal. Dec. 29, 2023) (taking judicial notice of  
7 historical laws and regulations governing public carry of weapons).

8 Judicial notice of these records is therefore appropriate.

9  
10 Respectfully submitted,

11 Dated: January 26, 2024

**MICHEL & ASSOCIATES, P.C.**

*/s/ C.D. Michel*

C.D. Michel

Counsel for Plaintiffs

14 Dated: January 26, 2024

**LAW OFFICES OF DON KILMER**

*/s/ Don Kilmer*

Don Kilmer

Counsel for Plaintiff The Second Amendment  
Foundation

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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:

**REQUEST FOR JUDICIAL NOTICE 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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Verne Chief of Police Colleen  
Flores*

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

Executed January 26, 2024

  
Christina Castron