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8

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

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

20 Plaintiff,

21 v.

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

27 Defendants.
28

Case No. 2:23-cv-10169-SPG-ADS

**DECLARATION OF REGINA R.
CHAVEZ IN SUPPORT OF
DEFENDANTS LOS ANGELES
COUNTY SHERIFF'S
DEPARTMENT AND SHERIFF
ROBERT LUNA'S OPPOSITION
TO PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Judge: Hon. Sherilyn Peace
Garnett

Hearing Date: March 13, 2024

Hearing Time: 1:30 p.m.

Courtroom: 5C

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1 I, Regina R. Chavez, declare:

2 1. I am a custody assistant in the Conceal Carry Weapon (CCW) Unit of
3 the Los Angeles County Sheriff's Department (LASD).

4 2. I am writing this declaration to inform the Court about the process for
5 obtaining a CCW permit in Los Angeles County and to provide the Court with
6 copies of materials related to the denial of Erick Velasquez' CCW application.

7 3. LASD is currently working through a backlog of CCW applications
8 that materialized in the wake of the *Bruen* decision.

9 4. Before the *Bruen* decision, applicants who applied for a CCW permit
10 in California had to demonstrate good cause for the permit to issue, which limited
11 the number of applications that LA County received. During this pre-*Bruen* time
12 period—from early 2021 through July 2022—LASD accepted initial CCW
13 applications from any of the 28 participating law enforcement agencies in LASD's
14 MOU, which eventually led to all of LA County. LASD did so even where those
15 residents lived in municipalities that could process their CCW applications
16 instead.

17 5. On June 24, 2022, following the *Bruen* decision, the California
18 Attorney General directed issuing authorities to no longer enforce the good cause
19 requirement in the CCW permitting regime. LASD subsequently received a
20 massive influx of CCW applications, approximately 1000–1200 per month for at
21 least six months. Prior to *Bruen*, LASD staff were able to handle the volume of
22 incoming applications. But the post-*Bruen* influx strained LASD's capacity.

23 6. Since then, LASD has made a number of changes to improve its
24 response times.

25 7. *First*, LASD implemented an electronic application system. Prior to
26 May 2023, LASD received all applications for CCWs by hard paper copy. LASD
27 employees then manually inputted those applications into LASD's online
28 system—a time- and labor-intensive process. On May 22, 2023, LASD launched

1 its automated application system Permitium, through which applicants can apply
2 directly online. This system eliminated LASD employee time spent inputting new
3 applications into the system.

4 8. *Second*, LASD staff members have been putting forth their best
5 efforts to timely process CCW applications, including working overtime. Before
6 January 2024, LASD typically had around five investigators who handled both
7 renewals and initial applications, though the number of investigators fluctuated.
8 During that time, the staff was able to process approximately 20-30 applications
9 per week. LASD, with the assistance of available support personnel from other
10 units, now has four permanent investigators dedicated to initial applications who
11 are assigned approximately 45 applications each week and one investigator
12 focused solely on CCW renewals who can process the background on
13 approximately 40 applications per week. Despite its budget limitations, LASD is
14 currently working to add additional investigators to the team.

15 9. *Third*, LASD worked with law enforcement agencies to clarify the
16 specific cities for which it would handle CCW applications. As of August 2022,
17 LASD limited first-time applicants to residents residing within LASD's contract
18 cities and LASD's unincorporated communities. Due to this change, the number
19 of applications on a monthly basis significantly declined.

20 10. Notwithstanding LASD's efforts to improve processing times, a
21 significant backlog remains. There are approximately 7,300 paper applications
22 submitted before the shift to Permitium and approximately 2,100 applications
23 submitted via Permitium that still need to be processed. In addition, the county-
24 wide applications that LASD granted before the *Bruen* decision are now up for
25 renewal, which is adding additional volume to the backlog. Currently, LASD is
26 working through paper applications that were manually entered into LASD's
27 tracking system in December 2022, though LASD would have received these hard
28 copy applications months before then.

1 11. Beyond the volume concerns, there are additional factors affecting
2 the processing timeline.

3 12. Applications as received often require LASD investigators to follow
4 up with applicants to procure further documentation and information, causing
5 additional delays.

6 13. For a period of time, background checks conducted by the
7 Department of Justice often took longer than anticipated to complete. That was
8 entirely outside LASD's control.

9 14. LASD experienced staffing shortages, budget constraints, and office
10 relocation measures, which delayed processing applications.

11 15. Last, LASD also had a change in administration following the
12 election of a new sheriff, causing delay in the approval and issuance of CCW
13 licenses.

14 16. Attached hereto as Exhibit 1 is a true and correct copy of the Los
15 Angeles Sheriff's Department's denial of Mr. Velasquez' carry a concealed
16 weapon application.

17 17. Attached hereto as Exhibit 2 is a true and correct copy of the police
18 reports retrieved during processing of Mr. Velasquez' carry a concealed weapon
19 application.

20 I declare under the penalty of perjury under the laws of the United States of
21 America that the foregoing is true and correct.

22
23 Executed on February 21, 2024.

24
25 */s/ Regina R Chavez*

26 Regina R. Chavez