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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)

**SUPPLEMENTAL REQUEST
FOR JUDICIAL NOTICE IN
SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY
INJUNCTION (COMBINED
REPLY)**

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 submitted in rebuttal to support the Combined Reply in
8 Support of Plaintiffs' Motion for Preliminary Injunction:

9 1. **Florida Department of Agriculture and Consumer Services**
10 **Acceptable Firearms Training Documentation Webpage.** A true and correct
11 copy of this document is attached as **Exhibit L.** Exhibit L is available online at
12 [https://www.fdacs.gov/Consumer-Resources/Concealed-Weapon-](https://www.fdacs.gov/Consumer-Resources/Concealed-Weapon-License/Applying-for-a-Concealed-Weapon-License/Acceptable-Firearms-Training-Docummentation)
13 [License/Applying-for-a-Concealed-Weapon-License/Acceptable-Firearms-](https://www.fdacs.gov/Consumer-Resources/Concealed-Weapon-License/Applying-for-a-Concealed-Weapon-License/Acceptable-Firearms-Training-Docummentation)
14 [Training-Docummentation](https://www.fdacs.gov/Consumer-Resources/Concealed-Weapon-License/Applying-for-a-Concealed-Weapon-License/Acceptable-Firearms-Training-Docummentation) (last visited Feb. 24, 2024).

15 2. **Florida Department of Agriculture and Consumer Services**
16 **Eligibility Requirements for a Florida Concealed Weapon License Webpage.** A
17 true and correct copy of this document is attached as **Exhibit M.** Exhibit M is
18 available online at [https://www.fdacs.gov/Consumer-Resources/Concealed-](https://www.fdacs.gov/Consumer-Resources/Concealed-Weapon-License/Applying-for-a-Concealed-Weapon-License/Eligibility-Requirements)
19 [Weapon-License/Applying-for-a-Concealed-Weapon-License/Eligibility-](https://www.fdacs.gov/Consumer-Resources/Concealed-Weapon-License/Applying-for-a-Concealed-Weapon-License/Eligibility-Requirements)
20 [Requirements](https://www.fdacs.gov/Consumer-Resources/Concealed-Weapon-License/Applying-for-a-Concealed-Weapon-License/Eligibility-Requirements) (last visited Feb. 24, 2024).

21 3. **Riverside County Sheriff's Department Concealed Carry License**
22 **Webpage, Permitium.** A true and correct copy of this document is attached as
23 **Exhibit N.** Exhibit N is available online at
24 <https://riversideca.permitium.com/ccw/start> (last visited Feb. 24, 2024).

25 4. **San Bernardino County Sheriff's Department Concealed Carry**
26 **License Webpage, Permitium.** A true and correct copy of this document is
27 attached as **Exhibit O.** Exhibit O is available online at
28 <https://sbcsd.permitium.com/ccw/start> (last visited Feb. 24, 2024).

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

9 Most of these exhibits are either directly from government websites, or the
 10 websites of contractors working with those governments to handle CCW permit
 11 application processing. “[A] court can take judicial notice of a government's
 12 website.” *EVO Brands, LLC v. Al Khalifa Grp. LLC*, 657 F. Supp. 3d 1312, 1321
 13 (C.D. Cal. 2023), citing *Daniels–Hall v. National Education Association*, 629 F.3d
 14 992, 999 (9th Cir. 2010) (taking judicial notice of information on the websites of
 15 two school districts because they were government entities).

16 Judicial notice of these records is therefore appropriate.

17
 18 Respectfully submitted,

19 Dated: February 28, 2024

MICHEL & ASSOCIATES, P.C.

/s/ C.D. Michel

 C.D. Michel
 Counsel for Plaintiffs

22 Dated: February 28, 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:

SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION (COMBINED REPLY)

on the following parties, as follows:

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

by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

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

Executed February 28, 2024


Christina Castron