IN THE UNITED STATES COURT OF APPEALS

FOR THE NINTH CIRCUIT

Edward Peruta, et al,, Plaintiffs-Appellants, Michael J. Vogler, Intervenor-Pending **v.** County of San Diego, et al., Defendants-Appellees. State of California, Intervenor-Pending	Case No. 10-56971 MOTION FOR LEAVE TO FILE BRIEF ON THE MERITS D.C. No. 3:09-cv-02371-IEG BGS Southern District of California Hon. Irma E. Gonzalez District Judge

PROPOSED INTERVENOR MICHAEL J. VOGLER'S MOTION FOR LEAVE TO FILE A BRIEF ON THE MERITS

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Dated May 21, 2015 Proposed Intervenor appearing Pro Se

PROPOSED INTERVEVNOR MICHAEL J. VOGLER'S MOTION FOR LEAVE TO FILE A BRIEF ON THE MERITS

Proposed Intervenor Michael J. Vogler respectfully moves for leave to file a brief on the merits in these consolidated en banc appeals. Vogler has moved to intervene in Peruta, and that motion is currently pending before the Court in these en banc proceedings. Because Vogler's status in these appeals has not yet been resolved, Vogler is unsure whether his brief – submitted concurrently with this motion – is properly considered an intervenor's brief on the merits or an amicus brief. Accordingly, in the event that Vogler's motion to intervene is granted, Vogler seeks leave to file his brief an intervenor's brief on the merits.

Good cause exists for granting Vogler's request to file an intervenor's brief on the merits. Vogler has not yet filed a merits brief in these proceedings. As set forth in Vogler's motion to intervene, these appeals present issues of exceptional importance to him because the outcome of this case will have direct bearing on his ability to exercise his core Second Amendment right to right to keep and bear arms outside the home for lawful self-defense. Accordingly, Vogler requests that he be permitted to participate in these proceedings as an intervening party, including submission of party brief on the merits.

Alternatively, if the Court denies this motion, Vogler respectfully requests that his brief be filed as an amicus curiae brief pursuant to Federal Rule of Appellate Procedure 29(a)[1]

Dated: May 21, 2015

Respectfully Submitted,

/s/ Michael J. Vogler

Michael J. Vogler
Proposed Intervenor

[1] Pursuant to 9th Cir. R. 27-1, Proposed Intervenor Vogler has made three attempts to confer about this motion with Defendant-Appellees counsel, attorney for County of San Diego James Chapin; twice by telephone and voice mail (May 19 & 20) and once by email (May 20). Defendant-Appellees counsel has not responded to Proposed Intervenor's requests to confer.

9th Circuit Case Number(s) 10-56971

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Signature (use "s/" format) /s/ Michael J. Vogler

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IN THE UNITED STATES COURT OF APPEALS

FOR THE NINTH CIRCUIT

Edward Peruta, et al,	Case No. 10-56971
Plaintiffs-Appellants,	PROPOSED INTERVENOR'S BRIEF ON THE MERITS, OR ALTERNATIVELY AMICUS CURIAE IN SUPPORT OF PLAINTIFF-APPELLANTS
Michael J. Vogler,	
Intervenor-Pending	
v.	D.C. No. 3:09-cv-02371-IEG BGS
County of San Diego, et al.,	
Defendants-Appellees.	Southern District of California Hon. Irma E. Gonzalez District Judge
State of California,	
Intervenor-Pending	

PROPOSED INTERVENOR MICHAEL J. VOGLER'S BREIF ON THE MERITS OR ALTERNATIVELY, BRIEF OF AMICUS CURIAE IN SUPPORT OF PLAINTIFFS-APPELLANTS

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Dated May 21, 2015 Proposed Intervenor appearing Pro Se

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INTERST OF MICHAEL J. VOGLER AS PROPOSED INTERVENOR OR AMICUS CURIAE

Proposed Intervenor Michael J. Vogler ("Vogler") has a clear interest in the outcome of this case because the Court's decision in this case, following the en banc re-hearing order of March 26, 2015, will directly affect his ability to exercise his constitutional right to keep and bear arms outside the home in California for the Second Amendment's core purpose of self-defense. Additionally, the outcome of this case may adversely impact his ability to defend his core Second Amendment rights in a current action against the Pasadena Chief of Police, Phillip Sanchez, and the City of Pasadena ("Pasadena"), which, in part, involves the same question of "good cause" for the issuance of a Concealed Carry Permit (CCW), and the lawful carrying of a handgun for self-defense in California.

Like the County of San Diego, the City of Pasadena's nearly identical policy for determining "good cause", explicitly excludes self-defense, or fear for one's safety alone, as not being enough to establish "good cause" as a matter of government policy. The exclusionary result of this unconstitutional depravation of Second Amendment rights leaves Proposed Intervenor unable to lawfully defend himself, and his family, in the event of violent public confrontation.

This blanket prohibition imposes such a severe restriction on Plaintiff-Appellants' and Proposed Intervenor Vogler's Second Amendment right to bear arms that it amounts to a total destruction of his core right to self-defense.

Accordingly, Vogler has a strong interest in the determination of the "good cause" questions presented in these consolidated cases.

Vogler has filed a motion to intervene in *Peruta*, and that motion is currently pending before the Court in these en banc proceedings. Accordingly, concurrently with this brief, Vogler is filing a motion for leave to file the brief as an Intervenor's Brief on the Merits, if his motion to intervene is granted. Alternatively, Vogler submits this brief as amicus curiae in support of plaintiffs-appellants pursuant to Federal Rule of Appellant Procedure 29(a).

JURISDICTIONAL STATEMENT

These consolidated appeals arise from actions raising constitutional claims under 42 U.S.C. § 1983, and the district courts had jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343. Each appeal is from a final judgment, and thus this Court has jurisdiction pursuant to 28 U.S.C. § 1291.

INTRODUCTION

The inherent right of self-defense is the core purpose of the Second Amendment's guarantee of the right to keep and bear arms. *District of Columbia v. Heller*, 554 U.S. 570, 592, 630, (2008)

The State of California, under the pretense of regulation, has imposed a near total prohibition on the peoples' right to bear arms, in any manner, by imposing restrictions so severe as to amount to the total destruction of the Second

Amendment's[1] core purpose of self-defense in the event of violent public confrontation.

Because California generally prohibits nearly all of its residents from openly carrying a handgun in public places, Cal. Pen Code §§ 25850, 26350, the only lawful means of exercising the inherent right of self-defense in cases of violent confrontation, and thereby the Second Amendment's core purpose, is by obtaining a concealed carry permit *before* such violent confrontation occurs, if one can be obtained at all. Absurd.

California law imposes stringent concealed carry permit requirements, including a finding of "good cause", Cal Pen. Code § 26150 - § 26225, as subjectively determined by local county or city authorities. Cal. Pen. Code § 26150, 26155.

Because the County of San Diego has adopted a licensing policy, pursuant to Cal Pen. Code § 26160, where providing for adequate self-defense and concern for one's personal safety alone is not considered sufficient "good cause", Policy 218

[1] Under California law, open carry is prohibited in virtually all of the state, regardless of whether the weapon is loaded or unloaded. See Cal. Penal Code §§ 26150, 26155. The only acceptable way a typical responsible, law-abiding citizen can carry a weapon in public for the lawful purpose of self-defense, and thereby exercise his Second Amendment right, is with a concealed carry permit. *Id.* §§ 26150, 26155.

Sheriff's Dept. Co of SD, they have impermissibly enacted a blanket prohibition on concealed carrying by the general citizenry in public, depriving an individual of an adequate means of self-defense, which amounts to a near total destruction of his core Second Amendment right. *Heller I*, 554 U.S. at 629 (quoting *State v. Reid*, 1 Ala. 612, 616-617 (1840)) [which] would not pass constitutional muster "[u]nder any of the standards of scrutiny that [the Supreme Court has] applied to enumerated constitutional rights. *Id*.)

Because those blanket "good cause" prohibitions impose such a severe restriction on Plaintiff-Appellants', (and Proposed Intervenor's), inherent right of self-defense, when combined with the State's open carry prohibition, that they amount to the total destruction of the core purpose the Second Amendment's right to keep and bear arms. Accordingly, San Diego's "good cause" policy is unconstitutional and must be struck down.

ARGUMENT

On June 26, 2008, the Supreme Court of the United States, following a detailed and historical analysis of the Second Amendment of the United States Constitution, concluded that the Second Amendment codified a pre-existing, individual right to keep and bear arms and that the central component of that right is self-defense, *Dist. Of Columbia v. Heller*, 554 U.S. 570, 577 (2008), and

accordingly, struck down a District of Columbia law that banned handgun possession in the home. *Id*. at 628-629.

Two years later, in *McDonald v. City of Chicago*, 561 U.S. 742 (2010), the Supreme Court affirmed its *Heller* decision, "[T]his court held that the Second Amendment protects the right to keep and bear arms for the purpose of self-defense…" *Id*. and opined that self-defense, recognized since ancient times as a "basic right", was the "central component" of the Second Amendment guarantee. *Id*. The Supreme Court also concluded that that right restricted not only the federal government, but through Due Process Clause of the Fourteenth Amendment applied to the States as well. *Id*.

A. The Right Of Self-Defense, The Core Component Of The Second Amendment's Right To Keep And Bear Arms Applies Not Just In the Home, But Outside The Home As Well.

When the Supreme Court handed down its landmark decision in *Dist. Of Columbia v. Heller*, 554 U.S. 570 (2008), concluding that the right to self-defense was the core component of the Second Amendment's the right to keep and bear arms, *Id*. at 577, it seems apparent that the Court intended, if even impliedly, that the Second Amendment's right to keep and bear arms for the purpose of self-

defense by the general citizenry[2] is not limited to the home, but extends to public places as well.

One need look no further than the first sentence of *McDonald v. City of Chicago*, 561 U.S. 742 (2010), to understand the Court's intent; "Two years ago, in District of Columbia v. Heller, 544 U.S. ___, this Court held that the Second Amendment protects the right to keep and bear arms for the purpose of self-defense **and** stuck down a District of Columbia law that banned the possession of handguns in the home" (emphasis added). *Id*. The "**and**" in their decision is telling. The Court accomplished *two separate things* with its *Heller* decision; (1) affirming the guaranteed Second Amendment right to keep and bear arms for self-defense and, (2) consequently, struck down a D.C. law that infringed on that right by completely banning the possession of handguns in the home.

The Fourth Circuit understood the Supreme Court's intent to apply *Heller* to public places, not just in the home. Accordingly, in *United States v. Masciandaro*, 638 F.3d 458, 467 (4th Cir. 2011) the Fourth Circuit concluded, "the right to 'protect [oneself] against both *public* and private violence…thus extending the

[2] The Supreme Court in Heller I explained: "Nothing in our opinion should be taken to cast doubt on the longstanding prohibitions on the possession of firearms by felons and the mentally ill, or laws forbidding the carrying of firearms in sensitive places such as schools and government buildings, or laws imposing conditions and qualifications on the commercial sale of arms. *Id*. at 626-27.

right in some from to wherever a person could become exposed to public or private violence."

The Seventh Circuit also understood the Supreme Court's intent, as expressed in *Heller* and *McDonald* that the Second Amendment right to keep and bear arms for self-defense extends beyond the home; "bearing a weapon inside the home does not exhaust this definition of "carry". For one thing, the very risk occasioning such carriage, "confrontation" is not limited to the home." *Moore v. Madigan*, 702 F.3d 933, 936 (7th Cir. 2012).

Even the Ninth Circuit, in its panel opinion in *Peruta v. County of San Diego*, 742 F.3d 1144 (9th Cir. 2014) the majority agreed that the intent of the Supreme Court could not be more clear[3]: "Our conclusion that the right to bear arms includes the right to carry an operable firearm outside the home for the lawful purpose of self-defense is perhaps unsurprising—other circuits faced with this question have expressly held, or at the very least have assumed, that this is so. *Moore*, 702 F.3d at 936 ("A right to bear arms thus implies a right to carry a loaded

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[3] In Granting en banc rehearing in Peruta, the Ninth circuit provided that the panel opinion "[s]hall not be cited as precedent by or to any court of the Ninth circuit." 2015 WL 1381862, at *1. While the opinion was thus stripped of precedential and preclusive force, it retains its persuasive value. See, e.g. Los Angeles Cnty. V. Davis, 440 U.S. 625, 646 n.10 (1979) (Stewart, J., dissenting); Los Angeles Cnty. V. Davis, 440 U.S. 625, 646 n.10 (1979) (Bybee, J., concurring);, id at 729-35 (Thomas, J., concurring in part and dissenting in part).

gun outside the home."); see also, e.g., *Drake*, 724 F.3d at 431 (recognizing that the Second Amendment right " *may* have some application beyond the home"); *Woollard v. Gallagher*, 712 F.3d 865, 876 (4th Cir.2013) ("We ... assume that the Heller right exists outside the home...."); *Kachalsky*, 701 F.3d at 89 (assuming that the Second Amendment "must have some application in the very different context of the public possession of firearms")." *Id*. at 1166

The United States District Court for the District of Columbia agrees. Judge Fredrick Scullen, Jr. sums it up well in *Palmer v. District of Columbia*, 2014 U.S. Dist. Lexis 101945; 2014 WL 3702854, "The [Supreme] Court found [in *Heller*] support for the proposition that the Second Amendment secures an individual right to carry in case of confrontation means nothing if not the general right to carry a common weapon outside the home for self-defense. Furthermore, as the court in *Peruta* correctly pointed out (emphasis added), "with Heller on the books, the Second Amendment's original meaning is now settled in at least two relevant respects". *Peruta*, 742 F.3d at 1155. "First, *Heller* clarifies that the keeping and bearing of arms is, and *has always been*, an individual right. Id. (citing *Heller*, 554 U.S. at 616, 128 S. Ct. 2783) Second, the right is, and *has always been* oriented to the end of self-defense." Id. (citation omitted)."…This Court, joining with most of the other courts that have addressed this issue, reached the same conclusion."

There is little doubt that the Supreme Court's decisions in *Heller* and *McDonald* intended that the Second Amendment's right to keep and bear arms by a private law abiding citizen extended not just to in the home, but outside the home as well.

Accordingly, the Court should find that Plaintiff-Appellant's (and Proposed Intervenor's) Second Amendment right to keep and bear arms for the core purpose of self-defense exists not just in the home, but outside the home as well.

B. Because California's "good cause" requirement, as applied by the County of San Diego, amounts to a total destruction of the Second Amendment's core right of self-defense, it must be struck down.

Where the constitutionality of a firearm law or regulation is challenged, the Ninth Circuit generally uses two-step approach to determine whether the challenged law or regulation impermissibly infringes on the Second Amendment. The first step in this analysis requires that the court determine whether a particular statutory provision impinges on a right the Second Amendment protects. If it does, the court proceeds to determine whether the provision at issue unlawfully burdens that right under the appropriate level of scrutiny. *See United States v. Chovan*, 735 F.3d 1127, (9th Cir. 2013).

Where a challenged regulation implicates the Second Amendment, but does not burden the core right to bear arms in self-defense, intermediate scrutiny is

appropriate. *Id*. at 1138. However, for cases involving the destruction of a right at the core of the Second Amendment intermediate scrutiny is not appropriate, *Peruta*. 742 F.3d 1144 (9th Cir. 2014), because it is an infringement under any light. *Heller*, 554 U.S. at 629 (quoting Reid, 1 Ala. at 616-17); *see also Heller II*, 670 F.3d at 1271(Kavanaugh, J., dissenting).

But, where a law under the pretense of regulating, amounts to a destruction of that enumerated constitutional right it will not pass constitutional muster, "[u]nder any of the standards of scrutiny" Id. at 628–29, 128 S.Ct. 2783. Simply put, a law that destroys (rather than merely burdens) a right central to the Second Amendment must be struck down. *Id*.

Because under California Law, open carry is prohibited in virtually all of the state, regardless of whether the weapon is loaded or unloaded, Cal. Penal Code §§ 26150, 26155, the only acceptable way a typical responsible, law-abiding citizen can carry a weapon in public for the Second Amendment's core purpose of self-defense is with a concealed carry permit. *Id.* §§ 26150, 26155. *Peruta v. County of San Diego*, 742 F.3d 1144 (9th Cir. 2014). There is no other way.

Consequently, California law imposes stringent concealed carry permit requirements, including a finding of "good cause", Cal Pen. Code § 26150 - § 26225, as determined, subjectively, by local county sheriffs or city police chiefs. Cal. Pen. Code § 26150, 26155. Without a finding of "good cause", (County of

San Diego effectively excludes self-defense, i.e. "concern for one's safety alone is not enough" from the meaning of "good cause") a CCW license will not be issued, and the applicant will be deprived the right to exercise his core Second Amendment right of self-defense, in any manner outside the home. Combined with the State's open carry ban, that person will be left unable to defend himself or herself when violent confrontation occurs.

Yet Defendant-Appellees, and proposed intervenor State of California, argue that the Court should not consider the State's handgun prohibitions and regulations in toto, because the question before the court deals only with *concealed* handguns. Nonsense. This is a disingenuous straw man argument that nonsensically parses the Second Amendment into meaninglessness.

The Court must consider that *the only way* a person can exercise his or her Second Amendment right, the chosen method of the State of California, is by concealed carry. Period. The State's licensing scheme, as applied by San Diego's "good cause" policy goes far beyond merely "burdening" a core right of the Second Amendment. It effectively destroys it, because concern for one's safety alone, i.e. self-defense, is not sufficient reason, according to the Sheriff of the County of San Diego, to trigger the Constitutional right contained within the Second Amendment. The Supreme Court has held otherwise.

Yet, Defendant-Appellees, and proposed intervenor State of California, suggest that the Court should pretend the State's *concealed* carry regulations operate in a vacuum, independent from the State's open carry ban. Not only do they misapprehend the issue, but this is deceptive. The core purpose of the Second Amendment cannot exist where, one the one hand, the means to exercise one's right of self-defense is banned outright, and on the other, so restrictive as to exclude that very right from the at definition of "good cause" at the core of the Second Amendment right to keep and bear arms. Deprived if you do. Deprived if you don't.

Additionally, Defendant-Appellees and proposed intervenor State of California wrongly ask the court to employ an intermediate level of scrutiny test of their licensing scheme because they claim it lies outside the "core purpose" of the Second Amendment. Nonsense. The Supreme Court has spoken. Self-defense is a core purpose of the Second Amendment and, for cases involving the destruction of a right at the core of the Second Amendment, with the State's licensing scheme does, as applied by Defendant-Appellees, intermediate scrutiny is not appropriate, *Peruta,* 742 F.3d 1144 (9th Cir. 2014) because, under the pretense of regulation, County of San Diego's policy destroys, rather than merely burdens, a right central to the Second Amendment. It be struck down.

CONCLUSION

Because the Second Amendment's guarantee of the right to keep and bear arms extends beyond the home and into public places as well; and San Diego's "good cause" policy, as applied to Plaintiff-Appellants, amounts to the total destruction of their core right of self-defense under the Second Amendment. It must be struck down.

Dated May 21, 2015

Respectively Submitted,

/s/Michael J. Vogler

Michael J. Vogler
Proposed Intervenor