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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

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FOR THE COUNTY OF LOS ANGELES

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CENTRAL DISTRICT

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ANTHONY MARIO ASSENZA, et al.,

) CASE NO.

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Plaintiffs and Petitioners,

) **DECLARATION OF BRIAN PAUL SOHAN
GOLDSTEIN**

18

vs.

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THE CITY OF LOS ANGELES, et al.

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Defendants and Respondents.

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1 the transportation of controlled narcotic substances, as well as large sums of money, which makes
2 me an extremely vulnerable target.

3 8. In order to protect myself, I contacted Burt Jacobson, an associated attorney in this
4 case, to assist me with the application process for applying for a carry concealed weapons license.

5 9. My carry concealed weapons application was mailed to the Los Angeles Police
6 Department Gang and Operations Support Division in May of 2010.

7 10. I received notice from the LAPD that my May application was rejected for two
8 reasons: (1) I did not use a current version of the carry concealed weapon license application form
9 and (2) the application was signed without being signed in the presence of an officer.

10 11. In the LAPD's rejection letter, they provided what they termed their current
11 application form, which looked identical to the application form I originally submitted. I filled out
12 the form and submitted my revised carry concealed weapons form to the same LAPD Gang Unit.
13 I thereafter received a phone call and was told I needed to be interviewed by a police officer. My
14 interview with a police officer took place a few days thereafter and the interview lasted
15 approximately 30 minutes. I was informed that I would be contacted regarding the status of my
16 application.

17 12. My application was received by the Los Angeles Police Department on June 16,
18 2010. Attached hereto is a true and accurate copy of the correspondence I received from the Los
19 Angeles Police Department confirming their receipt of my carry concealed weapon license
20 application at Exhibit A.

21 13. At least four months passed and I never received any update with respect to my
22 carry concealed weapons application. I asked Mr. Jacobson to assist me in obtaining information
23 about the status of my revised carry concealed weapons license application. Mr. Jacobson sent a
24 letter to the Los Angeles Police Department, dated October 26, 2010, inquiring into the status of
25 my submitted application. He also attached a newspaper clipping from the Los Angeles Times
26 dated October 8, 2010. This article concerned a narcotics robbery that took place by two men who
27 were dressed as uniformed police officers and was attached to illustrate my need to obtain a carry
28 concealed weapons license due to the nature of my occupation. I was copied on this letter.

1 Attached hereto is a true and accurate copy of Mr. Jacobson's October 26, 2010 letter at Exhibit
2 B.

3 14. On January 13, 2011, Mr. Jacobson received a fax from the Los Angeles Police
4 Department indicating that my carry concealed weapons application was denied in September
5 2010. He forwarded this fax to me. Attached hereto is a true and accurate copy of the fax
6 received concerning the September 7, 2010 denial letter at Exhibit C.

7 15. I never received the aforementioned September 2010 denial letter until Mr.
8 Jacobson forwarded me a copy of the letter in January of 2011 in response to his October of 2010
9 letter to LAPD.

10 16. Pursuant to the denial letter and Mr. Jacobson's formal demand that I be presented
11 to the advisory panel for a review, my carry concealed weapons license application and its
12 accompanying documents were reviewed by the advisory board in March 2011. Attached hereto
13 is a true and accurate copy of Mr. Jacobson's formal demand at Exhibit D.

14 17. On April 4, 2011, I received a call from Officer Bun from the Los Angeles Police
15 Department. He informed me that the Los Angeles Police Department had received the advisory
16 panel's recommendation that I should be issued a carry concealed weapons license. Officer Bun
17 informed me that the Chief of Police would take the advisory panel's recommendation under
18 consideration and the Chief of Police would contact me with his final determination. I was
19 informed that I would receive a final decision regarding my carry concealed weapons license
20 application within approximately the same time period as it took for me to receive my first denial
21 letter, which took approximately three months.

22 18. Despite my efforts of showing good cause, submitting a carry concealed weapons
23 license application twice, and interviewing with a police officer, I still have failed to receive a
24 carry concealed weapons license.

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1 19. Although the LAPD sent me an application form as described above, at no time
2 was I ever provided by the LAPD or City of Los Angeles a copy of the written policies of the
3 LAPD regarding the handling of an application for a carry concealed weapons license.

4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct. If called to testify, I would testify to the above facts.

6 Dated: April 4, 2011

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8 Brian Paul Sohan Goldstein

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