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AUG 25 2015

FRESNO COUNTY SUPERIOR COURT

By \_\_\_\_\_ LP - DEPUTY

7  
8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF FRESNO

10 KIM BELEMJIAN; JONATHAN  
11 FAIRFIELD; T.J. JOHNSTON; MATTHEW  
12 PIMENTEL; STANLEY ROY; FFLGUARD,  
INC.; CALIFORNIA RIFLE AND PISTOL  
ASSOCIATION;

13 Plaintiffs,

14 vs.

15 KAMALA D. HARRIS, in her official  
16 capacity as Attorney General for the State of  
California; STEPHEN LINDLEY, in his  
17 official capacity as CHIEF OF THE  
CALIFORNIA DEPARTMENT OF JUSTICE  
18 BUREAU OF FIREARMS; CALIFORNIA  
DEPARTMENT OF JUSTICE; and DOES 1 -  
19 10;

20 Defendants.

CASE NO. 15-CE-CG-00029

**DECLARATION OF EDWARD  
WORLEY IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES**

Date: December 16, 2015  
Time: 3:30 pm  
Dept.: 503  
Judge: Honorable Alan M. Simpson

Action Filed: January 6, 2015

**DECLARATION OF EDWARD WORLEY**

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I, Edward Worley, declare as follows:

1. I am employed by the National Rifle Association, Inc. I attend regulatory meetings, including meetings held by the California Department of Justice. I have personal knowledge of the statements made herein, and if called as a witness, I could and would competently testify under oath to the matters that I have set forth in this declaration.

2. Senate Bill 683 (“SB 683”), was signed into law by Governor Edmund Brown on October 11, 2013. The bill created the Firearm Safety Certificate Program (“FSC Program”), an expansion and replacement of the now-defunct *Handgun* Safety Certificate Program. It also amended the Penal Code to require that long-gun purchasers successfully perform a “long-gun safe-handling demonstration” before taking possession of the firearm. Finally, SB 683 directed Defendant Department of Justice (“Department”) to adopt regulations establishing the “long-gun safe-handling demonstrations” before the laws were set to take effect on January 1, 2015.

3. On or about May 14, 2014, Assistant Chief of Defendant Department of Justice Bureau of Firearms, Mr. Steve Buford, e-mailed me and others copied to schedule a “stakeholder meeting” to discuss the transition of the Handgun Safety Certificate Program to the Firearm Safety Certificate Program. According to Mr. Buford’s e-mail, I understood the purpose of the meeting was to obtain the input of stakeholders in support of the implementation of SB 683. I thanked Mr. Buford for the update.

4. On or about May 29, 2014, I attended a meeting hosted by Defendant Department for FSC Program stakeholders, including firearm dealers and representatives of firearm-rights organizations. Defendant Stephen Lindley was in attendance.

5. At the May 2014 meeting, Defendant Department requested feedback regarding the implementation of SB 683, including the operation of the FSC Program and the long-gun safe-handling demonstrations. Defendant Department did not mention, however, anything concerning the drafting, consideration, and adoption of permanent or emergency regulations in compliance with the Administrative Procedure Act.



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**PROOF OF SERVICE**

I, Laura Quesada, am employed in the City of Long Beach, Los Angeles County, California. I am over the age eighteen (18) years and am not a party to the within action. My business address is 180 East Ocean Blvd., Suite 200, Long Beach, California 90802.

On August 25, 2015, I served the foregoing document(s) described as:

**DECLARATION OF EDWARD WORLEY IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS FEES**

on the interested parties in this action by placing  
[ ] the original  
[X] a true and correct copy  
thereof enclosed in sealed envelope(s) addressed as follows:

Mr. Jeffrey Rich  
Deputy Attorney General  
1300 I Street  
Sacramento, CA 95814

       **(PERSONAL SERVICE)** I caused such envelope to delivered by hand to the offices of the addressee.

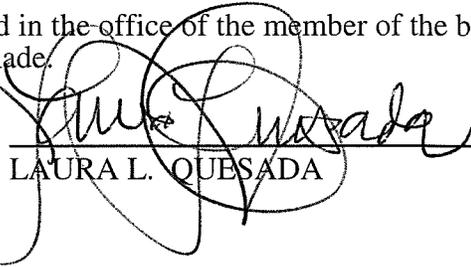
Executed on \_\_\_\_\_, 2015, at Long Beach, California.

  X   **(OVERNIGHT MAIL)** As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for overnight delivery by UPS/FED-EX. Under the practice it would be deposited with a facility regularly maintained by UPS/FED-EX for receipt on the same day in the ordinary course of business. Such envelope was sealed and placed for collection and delivery by UPS/FED-EX with delivery fees paid or provided for in accordance.

Executed on August 25, 2015, at Long Beach, California.

  X   **(STATE)** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

       **(FEDERAL)** I declare that I am employed in the office of the member of the bar of this court at whose direction the service was made.

  
\_\_\_\_\_  
LAURA L. QUESADA