

DECLARATION OF CARLOS DE LA GUERRA

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I, CARLOS DE LA GUERRA, declare as follows:

1. I am employed as an Assistant City Attorney with the Los Angeles City Attorney's Office. I have personal knowledge of all the facts set forth herein and if called upon to testify, I could and would do so competently. As to those matters of which I am informed and believe, I believe them to be true and accurate.

2. I am one of the attorneys representing Defendant City of Los Angeles in the Ex Parte Application for Temporary Restraining Order currently pending in *Bruce Boyer v. City of Los Angeles*, CV 12-04005 GAF (FFMx).

3. On May 8, 2012, Assistant City Attorney Debra Gonzales and I had a conference call with Plaintiff Bruce Boyer, wherein we informed him that the City had no interest in prohibiting him and his Sons of Liberty from exercising their First Amendment rights to express their disagreement with the Gun Buyback Program. We attempted to explain to Mr. Boyer that restricted areas were only open to those persons who had firearms to turn in. As more fully set forth in the Declaration of Detective Rick Tompkins, for the safety and security of all persons, those areas where the weapons are being removed from vehicles and being handled to render them safe are restricted to City personnel, police officers and those persons who are turning in the firearms.

4. On May 10, 2012, Assistant City Attorney Debra Gonzales and I had a phone conversation with Mr. Boyer's counsel, George Wallace. As more fully set forth in the Declaration of Debra Gonzales, we explained the City's position to Mr. Wallace. Mr. Wallace acknowledged that the positions of the parties were not far apart, and that the City's position was not unreasonable. Nevertheless, Mr. Wallace stated that we should file our response as requested by the Court and allow the Court to make the final determination.

5. I am informed and believe that one of the locations where the Gun Buyback will take place is the Los Angeles Fire Department training center. Though public property, use of the training center property is limited to Fire Department personnel and persons conducting Fire Department business.

1 6. On May 10, 2012, I printed two pages from the website "sonsoflibertyla.com."
2 Attached hereto as Exhibit "1" is a true and correct copy of the two pages entitled "May 12th, 2012
3 action. SonsofLibertyLA: Turn'in the tables on the L.A. gun buy-backs." I am informed and
4 believe that Plaintiff Bruce Boyer operates the website known as "sonsoflibertyla.com."

5 I swear under penalty of perjury under the laws of the United States that the foregoing is true
6 and correct. Executed this 10th day of May, 2012 at Los Angeles, California.

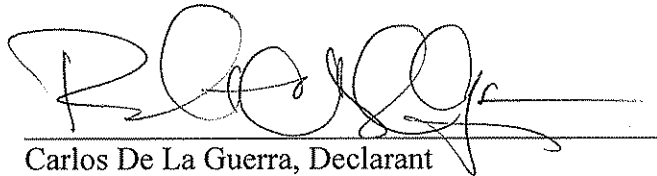
7
8 
9 Carlos De La Guerra, Declarant

EXHIBIT 1

SONS OF LIBERTY NEWS ---- GUN BUYBACK PROGRAM

[Return to Home Page](#)

[DUI CHECKPOINTS](#) | [CHECKPOINT REPORTS](#) | [WHY HAVE CHECKPOINTS?](#) | [4th AMENDMENT](#)



We support the CRPA & NRA but do not endorse other organizations

SonsofLibertyLA files for Federal Civil Rights Protection May 8th 2012

May 12th, 2012 action. SonsofLibertyLA: Turn'in the tables on the L.A. gun buy-backs.

Come on out and join the fun! This is a boots on the ground event to show the Regime and it's backers that the Patriots are out and we are taking back our Country! Show up wave the flag and stand up for your liberty in the face of the Regime.

The City of L.A. is scheduled to operate another "Gun buy-back" Saturday May 12th, 2012. Sons of Liberty LA has showed up to counter these sham propaganda events the last two years, as we turn the tables on their games. We will deploy teams at all locations to expose their fraud and propaganda for what it is. The City and it's co-sponsoring groups are doing all the publicity to get a turn-out for their media circus.

Their plan is to have people line up in their cars, a gun in the trunk, they wait in line on the street. Wait times can be from 1-2 hrs! There should be six (6) locations. Mission Hills; Fire Academy, (Dodger Stadium area), Mid City, two in So. LA and one in Wilmington. They are offering a \$100 Ralph's card, \$200 for an 'assault weapon'!

My Plan is to turn the tables on them and make this the LAST gun buy back in America. If we can establish a template for turning the tables on them, their propaganda is at an end. Three of the sites are churches. They are putting these churches at risk of great liability exposure and manipulating them I am working to show these churches that they are doing wrong to participate in these political shams.

To protect us from the abuses to our Civil rights that LAPD has inflicted in the past two years, we are having our Attorney, George Wallace file for an Emergency Civil Rights protective order in Federal Court. This order will clearly define that we have our rights to attend City events. That we may participate and interact with other attendees and deliver our political message.

1. We will man each of the sites with two 'Ropers' (who will talk to the folks in line to steer them to the gun stores; A videographer for our protection; Have three, NEED Three more.

A law-enforcement/attorney on our side to keep the Regime people in check.
We Have three Need three more.

Hagglers and blockers: Have several, can use as many as can come out. These hagglers have the ability to actually snarl the event into a pretzel, legally of course!

2. Each site will have one or more vehicles displaying a 4'x 8' banner reading
"Top \$\$\$ paid for your gun, cash!" Our people will have \$\$\$ for guns shirts to wear.

3. Our 'estimators/ropers' will offer to give them a free valuation. We will have two part NCR receipt books. The roper will write down the make, model, serial# and 'condition notes'. Send them over with that ticket and the map with driving directions printed up as "the gun store is only 12 miles from here!"

We call the gun store to get a confirmation of the gun's value, (yes, if the estimator is knowledgeable, he does not "need to be on the phone" but read on) the gun store rep will conf that the gun appears to be worth say \$200.00 cash! (The attendee would much prefer \$200 cash, or more to a \$100 gift card! If the 'gun' is a paperweight, we can tell them it's a paperweight, go get a gift card, NEXT!

4. We will have our videographers out to video our actions, those of the LAPD to insure that if they violate our rights and a Federal Court order, there will be video evidence of it. In addition by videoing the event, we may well deter those who seek to destroy criminal evidence under the LAPD's promise of anonymity.

5. I am inviting the Hagglers and Blockers to come out. These folks will get to drive into the buyback (repeatedly) and then haggle with them. If they are giving away gift cards for a 'gun' then "I want TWO, OK make it three gift cards!" "That is an Assault rifle, so I want the \$200 gift card". "Hold on there, I did not say you could take it out of my trunk, now put it back". A haggler that speaks 'Portuguese' would be hysterical, like anyone would know that what he was speaking was 'Portuguese'!

Maybe someone speaks 'Swedish', Ukrainian would be nice. Farsi and Chinese (any dialect) would be most welcome! Now my 90 year old mother will be coming out as a haggler, (yes she drives, now imagine how funny it will be them arguing with a 90 year old woman that her 'gun' is not real and she insists on THREE gift cards, and of course she is speaking Norwegian!" That's one for the U-Tube video! NOTE: There is no need to actually have a gun in the trunk, the purpose is just to haggle. Old BB guns and water-pistols would be preferred! These people will get to have more fun than anyone should be allowed to, but I am willing to let them!

We had one fellow last year whose car 'stalled' repeatedly, and then he haggled with them! If we can slow down the line to a crawl, people will leave to go to the gun stores! I recommend that no one bring a real gun of any type as they are looking to entrap people. They cannot make giving them a gun a condition for receiving a gift card! How many gift cards can our attendees collect?

When the news media, who will already be out there, stick a camera in a face, we will make the following points:

1. Why would anyone want a gift card when they can get cash???? Unless the 'gun' is really just a piece of junk, a paperweight. Or, it's stolen, and they want it to disappear???
2. We will be donating many of these guns to women who need protection. Our NRA instructors will provide them with full instruction. That is how to make the City safer, not by turning guns into scrap.

3. If the City/Regime actually cared about protecting people, they would give the guns away to the twenty-five women a day in this City who receive a Court approved Restraining order, as they are in danger. The politicians are more concerned with promoting their own false images than protecting the women of Los Angeles.
4. These events are a fraud. They allow criminals to dispose of murder weapons as any gun turned in can no longer be used as evidence. Last year I had the LAPD 'Gun unit' Det. Thompkins confirm this fact, on camera with the news-media, the reporterette was speechless. This also constitutes a destruction of evidence violation of PC 135. To see that the City would do this confirms that their agenda is political.

I will supply all materials, sign-trailers, banners etc. I am putting together money/investors to secure funds for purchases where needed.
I am looking for a gun store that is closer to S. LA. Wilmington, NEED ONE.

Have several investors putting in money to buy guns (we are talking about buying 1/2 of 2,500 guns (the other 1/2 are junk), that's 1,200 guns at \$200 ea, that are worth 2-3 times that, works out to \$240,000 to buy \$480-720,000 worth of guns for \$250,000!) NEED more investors.

The gun stores will act as agents for those who want to pay them to buy up quantities of guns. The guns will either be transferred to the buyer, or the buyer can have the gun store sell them on a consignment basis. There are agreements drawn up. The buyer's fee is \$50 plus \$25 DROS fee and something for the ropers \$25-\$50.00 depending on the 'deal' the gun is purchased for. Some very valuable guns will earn the ropers \$100.

I want to make sure that every roper gets a 'pick of the litter' gun for their work. Beyond that, I am expecting to work with men and women that have honor and integrity. We can all make some money, protect the women in our community and defend Our 2nd Amendment at the same time!

Bruce Boyer 818 799-0759

Bruce@SonsofLibertyLA.com NOTES:

If they have a weapon that the gun store could not buy (assault rifle) might it be worth it for them to drive to Arizona, for \$1,500??? Bet they would! Need an AZ/NV contact.

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CBS STORY ON MAY 12, 2012 GUN BUYBACK PROGRAM