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Superior Court of California
County of Los Angeles

NOV 12 2015

Sherri R. Carter, Executive Officer/Clerk
By: Jennifer De Luna, Deputy

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF LOS ANGELES
10 STANLEY MOSK COURTHOUSE

11 SHASTA COUNTY SHERIFF THOMAS BOSENKO,
12 SAN BERNARDINO COUNTY SHERIFF JOHN
McMAHON, KERN COUNTY SHERIFF DONNY
13 YOUNGBLOOD, SAN LUIS OBISPO COUNTY
SHERIFF IAN S. PARKINSON, SACRAMENTO
14 COUNTY SHERIFF SCOTT JONES, EL DORADO
COUNTY SHERIFF JOHN D'AGOSTINI, SISKIYOU
15 COUNTY SHERIFF JON LOPEY, TOULUMNE
COUNTY SHERIFF JAMES MELE, STANISLAUS
16 COUNTY SHERIFF ADAM CHRISTIANSON,
MERCED COUNTY SHERIFF VERN, TEHAMA
17 COUNTY SHERIFF DAVID HENCRATT,
HUMBOLDT COUNTY SHERIFF MICHAEL,
18 MENDOCINO COUNTY SHERIFF THOMAS D.
ALLMAN, SUTTER COUNTY SHERIFF J. PAUL
19 PARKER, MODOC COUNTY SHERIFF MICHAEL
POINDEXTER, FRESNO COUNTY SHERIFF
20 MARGARET MIMS, MADERA COUNTY SHERIFF
JAY VARNEY, AMADOR COUNTY SHERIFF
21 MARTIN RYAN, LASSEN COUNTY SHERIFF
DEAN F. GROWDON, COLUSA COUNTY SHERIFF
22 JOE GAROFALO, NEVADA COUNTY SHERIFF
KEITH ROYAL, TULARE COUNTY SHERIFF MIKE
23 BOUDREAUX, YUBA COUNTY SHERIFF STEVE
DURFOR, PLAINTIFF KINGS COUNTY SHERIFF
24 DAVID ROBINSON, PLUMAS COUNTY SHERIFF
GREGORY HAGWOOD, TRINITY COUNTY
25 SHERIFF BRUCE HANEY, SOLANO COUNTY
SHERIFF THOMAS A. FERRARA, GLENN COUNTY
26 SHERIFF RICHARD L. WARREN JR., BUTTE
COUNTY SHERIFF KORY L. HONEA, SIERRA
27 COUNTY SHERIFF TIM STANDLEY, CHAD
CHEUNG, PAUL WOLCOTT, JAMES WILEY, PAUL
28 NORDBERG, JULIO BERNAL, KENNETH

Case No.: BS158682

**DECLARATION OF PLAINTIFF
KENNETH TAKAHASHI IN SUPPORT
OF EX PARTE MOTION TO STAY
ENFORCEMENT OF LAMC SECTION
46.30, ALTERNATIVELY, FOR
TEMPORARY RESTRAINING ORDER
AND ORDER TO SHOW CAUSE**

Date: November 12, 2015

Time: 8:30 a.m.

Dept.: 85

Judge: Honorable James C. Chalfant

Action Filed: October 23, 2015

1 TAKAHASHI, LAW ENFORCEMENT ALLIANCE OF
2 AMERICA, INC., CALIFORNIA RIFLE AND PISTOL
ASSOCIATION, CALIFORNIA RESERVE PEACE
OFFICERS ASSOCIATION,

3 Plaintiffs and Petitioners,

4 vs.

5 THE CITY OF LOS ANGELES, MAYOR ERIC
6 GARCETTI, in his official capacity, LOS
ANGELES POLICE DEPARTMENT CHIEF CHARLIE
7 BECK, in his official capacity, and DOES 1-10,

8 Defendants and Respondents

9
10 **DECLARATION OF KENNETH TAKAHASHI**

11 I, Kenneth Takahashi, declare as follows:

12 1. I am a plaintiff in the above-entitled action. I make this declaration of my own personal
13 knowledge and, if called as a witness, I could and would testify competently to the truth of the
14 matters set forth herein.

15 2. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the
16 United States or the state of California. I have never been found by any law enforcement agency,
17 any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms
18 in any manner.

19 3. I am a resident of the city of Torrance, California.

20 4. I am a certified firearm safety instructor and the owner of Forward Assist Training, LLC,
21 a firearm safety and training school with base operations in Azusa, California.

22 5. I am a competition shooter for the International Practical Shooting Confederation.

23 6. I lawfully own and possess within the city of Torrance ammunition magazines with the
24 capacity to hold more than ten rounds that are prohibited by section 46.30 of the Los Angeles
25 Municipal Code.

26 7. As part of my business operations for Forward Assist Training, LLC, I provide several
27 firearm training classes each month. These classes range from basic handgun safety courses to
28 advanced training for private security and law enforcement personnel. My base of operations for

1 my training classes is located in Azusa, California. I also provide training classes at other
2 locations throughout California.

3 8. I regularly use magazines with capacity to accept more than ten rounds that are prohibited
4 by the City of Los Angeles as part of the training courses that I provide through Forward Assist
5 Training to individuals, security guards and law enforcement officers who carry such magazines
6 in the course and scope of their duties. I use these magazines at training courses I provide in
7 Azusa, California, as well as other training locations throughout California.

8 9. In order to travel to my training courses in Azusa, California and other locations in
9 California, I regularly travel through the City of Los Angeles. I am unable to transport my
10 lawfully owned magazines with capacity to accept more than ten rounds for use in my normal
11 business practices in Azusa, California, and other locations in California without traveling
12 through Los Angeles.

13 10. As of November 19, 2015, I will be unable to transport my lawfully owned magazines
14 through the City of Los Angeles for use in the course of my business operations for Forward
15 Assist Training, LLC without violating section 46.30 and thus subjecting myself to arrest and
16 criminal prosecution.

17 11. I travel outside California with my lawfully owned magazines with the capacity to accept
18 more than ten rounds that are prohibited by section 46.30.

19 12. In order to travel outside California, I must travel through the City of Los Angeles. I am
20 unable to transport my lawfully owned magazines with capacity to accept more than ten rounds
21 outside California without traveling through Los Angeles.

22 13. As of November 19, 2015, I will be unable to transport my lawfully owned magazines
23 through the City of Los Angeles to travel in and out of the state of California without violating
24 section 46.30 and thus subjecting myself to arrest and criminal prosecution.

25 14. I travel with my lawfully owned magazines with capacity to accept more than ten rounds
26 to locations throughout California for use in shooting competitions.

27 15. In order to travel to shooting competitions that I attend in locations throughout California,
28 I must travel through the City of Los Angeles. I am unable to transport my lawfully-owned

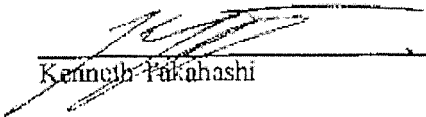
1 magazines with the capacity to accept more than ten rounds to shooting competitions at locations
2 throughout California without traveling through Los Angeles.

3 16. As of November 19, 2015, I will be unable to transport my lawfully owned magazines
4 through the City of Los Angeles to attend shooting competitions throughout California without
5 violating section 46.30 and thus subjecting myself to arrest and criminal prosecution.

6 17. I fear arrest and criminal prosecution if I travel through Los Angeles on or after
7 September 19, 2015 with my lawfully owned magazines with capacity to accept more than ten
8 rounds that are prohibited by section 46.30.

9 I declare under the penalty of perjury under the laws of the State of California that the
10 forgoing is true and correct.

11
12 Executed this 3 day of November, 2015, in Torrance, California.

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Kenneth Takahashi

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF LOS ANGELES

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

7 On November 9, 2015, I served the foregoing document(s) described as

8 **DECLARATION OF PLAINTIFF KENNETH TAKAHASHI IN SUPPORT OF EX
9 PARTE MOTION TO STAY ENFORCEMENT OF LAMC SECTION 46.30,
10 ALTERNATIVELY, FOR TEMPORARY RESTRAINING ORDER AND ORDER TO
11 SHOW CAUSE**

12 on the interested parties in this action by placing [] the original [X] a true and correct copy
13 thereof addressed as follows:

14 Mr. Benjamin Chapman
15 Deputy City Attorney
16 200 North Main Street, 9th Floor,
17 Los Angeles, California, 90012
18 Phone: (213) 473-6858
19 E-mail: benjamin.chapman@lacity.org

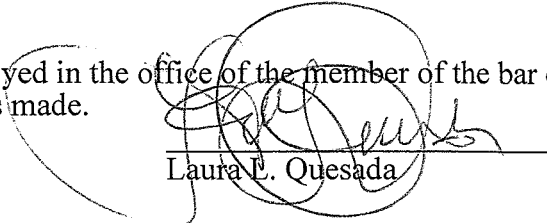
20 X (**BY MAIL**) As follows: By placing the sealed envelope for collection and mailing. I am
21 "readily familiar" with the firm's practice of collection and processing correspondence for
22 mailing. Under the practice it would be deposited with the U.S. Postal Service on that
23 same day with postage thereon fully prepaid at Long Beach, California, in the ordinary
24 course of business. I am aware that on motion of the party served, service is presumed
25 invalid if postal cancellation date is more than one day after date of deposit for mailing an
26 affidavit.
27 Executed on November 9, 2015, at Long Beach, California.

28 (**VIA 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 with ordinary business practices.
Executed on November __, 2015, at Long Beach, California.

X (**VIA ELECTRONIC MAIL**) As follows: I served a true and correct copy by electronic
transmission. Said transmission was reported and completed without error.
Executed on November 9, 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