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Superior Court of California
County of Los Angeles

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7
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 WARNKE,
17 TEHAMA COUNTY SHERIFF DAVID HENCRATT,
HUMBOLDT COUNTY SHERIFF MICHAEL
18 DOWNEY, MENDOCINO COUNTY SHERIFF
THOMAS D. ALLMAN, SUTTER COUNTY SHERIFF
19 J. PAUL PARKER, MODOC COUNTY SHERIFF
MICHAEL POINDEXTER, FRESNO COUNTY
20 SHERIFF MARGARET MIMS, MADERA COUNTY
SHERIFF JAY VARNEY, AMADOR COUNTY
21 SHERIFF MARTIN RYAN, LASSEN COUNTY
SHERIFF DEAN F. GROWDON, COLUSA COUNTY
22 SHERIFF JOE GAROFALO, NEVADA COUNTY
SHERIFF KEITH ROYAL, TULARE COUNTY
23 SHERIFF MIKE BOUDREAUX, YUBA COUNTY
SHERIFF STEVE DURFOR, KINGS COUNTY
24 SHERIFF DAVID ROBINSON, PLUMAS COUNTY
SHERIFF GREGORY HAGWOOD, TRINITY
25 COUNTY SHERIFF BRUCE HANEY, SOLANO
COUNTY SHERIFF THOMAS A. FERRARA, GLENN
26 COUNTY SHERIFF RICHARD L. WARREN JR.,
BUTTE COUNTY SHERIFF KORY L. HONEA,
27 SIERRA COUNTY SHERIFF TIM STANDLEY, CHAD
CHEUNG, PAUL WOLCOTT, JAMES WILEY, PAUL
28 NORDBERG, JULIO BERNAL, KENNETH

Case No.: BS158682

**DECLARATION OF PLAINTIFF PAUL
WOLCOTT 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
4 Plaintiffs and Petitioners,

5 vs.

6 THE CITY OF LOS ANGELES, MAYOR ERIC
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 PAUL WOLCOTT**

11 I, Paul Wolcott, 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 an honorably retired California peace officer who resides in the city of Lomita,
20 California.

21 4. In accordance with state law, I lawfully own and possess within my Lomita residence
22 ammunition magazines with the capacity to accept more than ten rounds that are prohibited by
23 section 46.30 of the Los Angeles Municipal Code.

24 5. I am currently employed in the city of Los Angeles, California, as a Senior Manager for
25 Corporate Security Operations & Special Events.

26 6. In the regular course and scope of my employment duties, and as part of my normal
27 business practices, I carry a firearm containing a magazine with the capacity to accept more than
28 ten rounds within Los Angeles that is prohibited by section 46.30.

1 7. I regularly travel outside Lomita with my lawfully owned magazines that are prohibited
2 by section 46.30 to shooting ranges to practice my marksmanship skills.

3 8. I also travel outside Lomita with these magazines to qualify and re-qualify for firearm-
4 related licenses, including those that I maintain for purposes of my employment. These licenses
5 and permits include an Exposed Firearm Permit issued by the California Department of Consumer
6 Affairs, a Security Guard Registration issued pursuant California Business and Professions Code
7 section 7582, and a retired law enforcement Identification Certificate issued pursuant to
8 California Penal Code section 25905.

9 9. As of November 19, 2015, I will be unable to transport my lawfully owned magazines
10 with capacity to accept more than ten rounds for use in my normal business practices in Los
11 Angeles, California without violating section 46.30 and thus subjecting myself to arrest and
12 criminal prosecution.

13 10. As of November 19, 2015, I will be unable to transport these magazines through the City
14 of Los Angeles to shooting ranges where I practice my marksmanship skills and locations where I
15 qualify and requalify for the firearm-related licenses I maintain for purposes of my employment
16 without violating section 46.30 and thus subjecting myself to arrest and criminal prosecution.

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

19 12. In order to travel from my home to locations outside California, I must travel through the
20 City of Los Angeles.

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

25 ///

26 ///

27 ///

28 ///

1 14. I fear arrest and criminal prosecution if I travel to my employment in Los Angeles or if I
2 travel through Los Angeles on or after September 19, 2015 with my lawfully owned magazines
3 with capacity to accept more than ten rounds that are prohibited by section 46.30.

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

6 Executed this 4TH day of November, 2015, in LOS ANGELES, California.

7
8 
9 Paul Wolcott

PROOF OF SERVICE

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

I, Laura L. 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 November 12, 2015, I served the foregoing document(s) described as

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

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

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

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

Executed on November 12, 2015, at Long Beach, California.

 (**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 12, 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