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ORIGINAL FILED  
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 JOE  
22 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 STEVEN DEMBER  
FOR CALIFORNIA RIFLE AND PISTOL  
ASSOCIATION 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  
7 GARCETTI, in his official capacity, LOS  
ANGELES POLICE DEPARTMENT CHIEF CHARLIE  
BECK, in his official capacity, and DOES 1-10,

8 Defendants and Respondents  
9

10 **DECLARATION OF STEVE DEMBER**  
**FOR THE CALIFORNIA RIFLE AND PISTOL ASSOCIATION**

11 I, Steve Dember, declare as follows:

12 1. I am the Treasurer of the California Rifle and Pistol Association, a named plaintiff in this  
13 action. I have personal knowledge of the statements made herein, and if called as a witness, I  
14 could and would competently testify under oath to the matters that I have set forth in this  
15 declaration.

16 2. The CRPA is a non-profit membership organization classified under section 501(c)(4) of  
17 the Internal Revenue Code and incorporated under the laws of California, with headquarters in  
18 Fullerton, California. In my capacity as Treasurer of the Board of Directors of the CRPA, I  
19 prepare, review, and keep the ledgers and financial records of the organization. I am also  
20 responsible, along with other CRPA board members, for determining the organizational goals of  
21 the CRPA.

22 3. CRPA is dedicated to the preservation and advancement of the civil rights of its individual  
23 members and the public. CRPA promotes the responsible use of firearms for lawful purposes  
24 including self-defense, hunting, and shooting sports.

25 4. CRPA provides education, training, and organized competition for adult and junior  
26 shooters. CRPA's membership is comprised of a diverse cross-section of the general public,  
27 including competitive and recreational shooters, hunters, youth, women, police, firearm experts,  
28 trainers, and parents who choose to own a firearm.

1 5. In this suit, CRPA represents the interests of its members, including individuals, police  
2 officers, and retired officers who are too numerous to conveniently bring into this action  
3 individually. These members' interests include their ownership and possession of magazines with  
4 the capacity to accept more than ten rounds in the city of Los Angeles, and their ability to travel  
5 into Los Angeles with their lawfully owned magazines, without being subjected to arrest and  
6 criminal prosecution.

7 6. CRPA members residing in the city of Los Angeles, California, lawfully own and possess  
8 within their Los Angeles residences ammunition magazines with the capacity to accept more than  
9 ten rounds that are prohibited by section 46.30 of the Los Angeles Municipal Code.

10 7. CRPA members reside outside the city of Los Angeles and travel into and through the  
11 city of Los Angeles with magazines with the capacity to accept more than ten rounds for use in  
12 shooting competitions and marksmanship training, during the course of their employment, to  
13 display at conventions, trade shows, and other events, to transport between their privately owned  
14 properties, and for self-defense purposes, including pursuant to statewide carry permits issued by  
15 California sheriffs.

16 8. CRPA members are subject to arrest and criminal prosecution under section 46.30 for  
17 possessing their lawfully owned magazines with the capacity to accept more than ten rounds in  
18 the city of Los Angeles on or after November 19, 2015.

19 9. CRPA members travel into and through Los Angeles with magazines that are prohibited  
20 by section 46.30 during the course and scope of their employment duties and in the normal course  
21 of their business operations.

22 10. As of November 19, 2015, CRPA members will be unable to transport their lawfully  
23 owned magazines into or through the City of Los Angeles for use in the course of their normal  
24 business operations without violating section 46.30 and thus subjecting themselves to arrest and  
25 criminal prosecution.

26 11. CRPA members travel outside California with their lawfully owned magazines with the  
27 capacity to accept more than ten rounds that are prohibited by section 46.30.  
28

1 12. In order to travel outside California, CPRA members must travel through the City of Los  
2 Angeles. CRPA members are unable to transport their lawfully owned magazines with capacity to  
3 accept more than ten rounds outside California without traveling through Los Angeles.

4 13. As of November 19, 2015, CRPA members will be unable to transport their lawfully  
5 owned magazines through the City of Los Angeles to travel in and out of the state of California  
6 without violating section 46.30 and thus subjecting themselves to arrest and criminal prosecution.

7 14. CRPA members travel with their lawfully owned magazines with capacity to accept more  
8 than ten rounds to locations throughout California for use in shooting competitions.

9 15. CRPA members are authorized to carry, throughout California, firearms that California  
10 Sheriffs, including plaintiffs, have authorized CRPA members to carry pursuant to permits issued  
11 under section 26150 of the California Penal Code, including firearms with magazines having  
12 capacities over ten rounds that are prohibited by section 46.30.

13 16. CRPA members are subject to arrest and prosecution if they travel through the city of Los  
14 Angeles on or after November 19, 2015, while carrying firearms with magazines having  
15 capacities over ten rounds that they have been authorized to carry pursuant to statewide licenses  
16 issued under California Penal Code section 26150.

17 17. CRPA members residing in areas of California that are surrounded by the City of Los  
18 Angeles are in possession of magazines with the capacity to hold more than ten rounds. These  
19 members are effectively "landlocked" and thus unable to travel between their homes and  
20 destination inside and outside California without traveling through the City of Los Angeles and  
21 thus subjecting themselves to criminal arrest and prosecution.

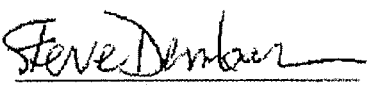
22 18. CRPA members residing in the greater Los Angeles area are unable to travel to areas  
23 within California or outside California using the LAX airport, which is subject to section 46.30,  
24 while in possession of their lawfully owned magazines with the capacity to hold more than ten  
25 rounds without subjecting themselves to criminal arrest and prosecution under section 46.30.

26 19. CRPA members fear arrest and criminal prosecution under section 46.30 for possessing  
27 their lawfully owned magazines with the capacity to accept more than ten rounds in the city of  
28 Los Angeles on or after November 19, 2015.

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

Executed this 4<sup>th</sup> day of November, 2015 in La Habra, California.

  
Steve Dember

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 4, 2015, I served the foregoing document(s) described as

8 **DECLARATION OF STEVEN DEMBER FOR CALIFORNIA RIFLE AND PISTOL  
9 ASSOCIATION IN SUPPORT OF EX PARTE MOTION TO STAY ENFORCEMENT OF  
10 LAMC SECTION 46.30, ALTERNATIVELY, FOR TEMPORARY RESTRAINING  
11 ORDER AND ORDER TO 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](mailto:benjamin.chapman@lacity.org)

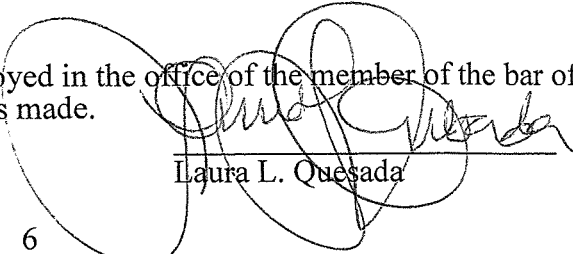
20 X (BY MAIL) As follows: By placing the sealed envelope for collection and mailing. I am  
21 "readily familiar" with the firm's practice of collection and processing correspondence for  
22 mailing. Under the practice it would be deposited with the U.S. Postal Service on that  
23 same day with postage 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 4, 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 4, 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.

28   
Laura L. Quesada