

# **EXHIBIT 3**

SAMUEL GOLDEN  
FLANAGAN vs CALIFORNIA ATTORNEY GENERAL

May 01, 2017

1

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

\_\_\_\_\_  
MICHELLE FLANAGAN, SAMUEL GOLDEN,  
DOMINIC NARDONE, JACOB PERKIO, and  
THE CALIFORNIA RIFLE & PISTOL  
ASSOCIATION,

Plaintiff(s),

vs.

CALIFORNIA ATTORNEY GENERAL XAVIER  
BECERRA, in his official capacity  
as Attorney General of the State  
of California, SHERIFF JAMES  
McDONNELL, in his official  
capacity as Sheriff of Los Angeles  
County, California, and DOES 1-10,

Defendants.

CASE NO. 2:16-cv-06164  
JAK-AS

DEPOSITION OF

SAMUEL GOLDEN

May 1, 2017

2:39 p.m.

300 South Spring Street  
Suite 1702  
Los Angeles, California

Maria Lozano, CSR NO. 13687



**Li Decl. Ex. 3 - 002**

800.211.DEPO (3376)  
EsquireSolutions.com

SAMUEL GOLDEN  
FLANAGAN vs CALIFORNIA ATTORNEY GENERAL

May 01, 2017

2

APPEARANCES OF COUNSEL

For the Plaintiff(s):

MICHEL & ASSOCIATES, P.C.  
SEAN A. BRADY, ESQ.  
180 East Ocean Boulevard  
Suite 200  
Long Beach, California 90802  
562.216.4444  
sbrady@michellawyers.com

For the Defendants:

STATE OF CALIFORNIA DEPARTMENT OF JUSTICE  
OFFICE OF THE ATTORNEY GENERAL  
P. PATTY LI, ESQ.  
455 Golden Gate Avenue  
Suite 11000  
San Francisco, California 94102  
415.703.1577  
patty.li@doj.ca.gov



SAMUEL GOLDEN  
FLANAGAN vs CALIFORNIA ATTORNEY GENERAL

May 01, 2017

3

## INDEX OF EXAMINATION

WITNESS: SAMUEL GOLDEN

EXAMINATION

PAGE

BY MS. LI

4

## INFORMATION REQUESTED

(None)

## INDEX TO EXHIBITS

Exhibit	Description	Page
7	Notice of deposition	5
8	Application, PSG00017	12

**ESQUIRE**  
DEPOSITION SOLUTIONS**Li Decl. Ex. 3 - 004**800.211.DEPO (3376)  
EsquireSolutions.com

SAMUEL GOLDEN  
FLANAGAN vs CALIFORNIA ATTORNEY GENERAL

May 01, 2017

4

DEPOSITION OF SAMUEL GOLDEN

May 1, 2017

SAMUEL GOLDEN,

having been first duly sworn through the court reporter,  
testified as follows:

EXAMINATION

BY MS. LI:

Q. Hi, can you please state your name and spell your last name for the record?

A. Samuel Thomas Golden, G-o-l-d-e-n.

Q. Have you ever had your deposition taken before?

A. Yes.

Q. Approximately when was that?

A. I don't recall.

Q. Was it months ago, years ago?

A. Years.

Q. The court reporter is recording everything that we say so we should try to only one person speaking at a time; that means I will try to let you finish answering the question before I ask my next question. And if you could let me finish asking a question before you start to answer, that would be great. If you need to take a break at any time, just let me know. If there's a question pending and you need



SAMUEL GOLDEN  
FLANAGAN vs CALIFORNIA ATTORNEY GENERAL

May 01, 2017  
18

1 Q. Without --

2 A. Or the ability to carry and defend myself.

3 Q. And do you have a preference in terms of carrying  
4 concealed or carrying openly?

5 A. Yes.

6 Q. What is your preference?

7 A. Concealed.

8 Q. And can you tell me why?

9 A. Because I believe that open carry can be a problem  
10 in of itself. If a bad person -- if a bad guy wants to take  
11 something from me and he can see that I have a gun, he'll  
12 probably kill me before he takes what he wants. If he  
13 doesn't see I have a gun, I might have a fighting chance.

14 Q. So you think concealed carry is safer for you in  
15 terms of if you were to encounter a bad guy?

16 A. Yes.

17 Q. Are there any other reasons why you prefer a  
18 concealed carry over open carrying?

19 A. I'm not crazy about everybody and their brother  
20 knowing that I have a gun. I don't want to advertise that  
21 I'm carrying a firearm, I just want to be able to carry,  
22 that's it.

23 Q. So is that -- is that a safety concern for -- on  
24 your part? You think it's safer for you or rather you think  
25 carrying openly could be a bit more dangerous for you?

SAMUEL GOLDEN  
FLANAGAN vs CALIFORNIA ATTORNEY GENERAL

May 01, 2017

19

1 A. I believe it's more dangerous and I believe it  
2 could cause people to jump to a conclusion that is not  
3 correct.

4 Q. What kind of conclusion?

5 A. Somebody that's anti-gun could just freak out  
6 because I'm -- I happen to be standing next to them in the  
7 grocery line with a gun on my hip.

8 Q. So even if open carry were permitted that person  
9 might, quote, unquote, freak out, might have an oversized  
10 reaction? Is that what you mean?

11 A. Yes.

12 Q. Did you decide to join this lawsuit after you  
13 learned that your most recent application to the L.A. County  
14 Sheriff had been denied?

15 A. No.

16 Q. When was -- when were you informed that your most  
17 recent application had been denied?

18 A. After I joined the lawsuit.

19 Q. But you -- you had previously applied and been  
20 denied before the lawsuit at some point; is that right?

21 A. Correct. But when I joined the lawsuit, my last  
22 correspondence from the Sheriff's Department was not that  
23 they were denying me, but that they were not making any  
24 decisions because they were waiting for --

25 Q. Peruta?

