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7
8 **IN THE UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **WESTERN DIVISION**

11 MICHELLE FLANAGAN, et al.,

12 Plaintiffs,

13 v.
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15 CALIFORNIA ATTORNEY
GENERAL XAVIER BECERRA, in
his official capacity as Attorney
16 General of the State of California, et
al.,

17 Defendants.
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Case No: 2:16-cv-06164-JAK-AS

**DECLARATION OF SAMUEL
GOLDEN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

Judge: John A. Kronstadt
Hearing Date: November 6, 2017
Hearing Time: 8:30 AM
Courtroom: 10B

Action Filed: August 17, 2016
Trial Date: February 6, 2018

DECLARATION OF SAMUEL GOLDEN

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2 1. I, Samuel (“Thomas”) Golden, am a plaintiff in the above-entitled action.
3 I make this declaration of my own personal knowledge and, if called as a witness, I
4 could and would testify competently to the truth of the matters set forth herein.

5 2. I am over the age of 21 and a current resident of Los Angeles County,
6 California.

7 3. I satisfy all applicable requirements to possess a firearm under state and
8 federal law and currently own a handgun.

9 4. I am not prohibited from owning firearms under the laws of the United
10 States or the state of California. I have never been found by any law enforcement
11 agency, any court, or any other government agency to be irresponsible, unsafe, or
12 negligent with firearms in any manner.

13 5. I am a Certified Carry License Instructor for California, Utah, and Florida.

14 6. I am also one of the trainers qualified to teach the Carry License training
15 course to individuals applying for a Carry License with the Los Angeles County
16 Sheriff. I have trained at least 10,000 shooters at almost every level.

17 7. I applied with Los Angeles County Sheriff James McDonnell for a Carry
18 License in Los Angeles County, using the California Department of Justice’s
19 standard application form that the Sheriff’s Department provided me. I asserted as
20 my “good cause” a desire to carry a firearm for self-defense, particularly because I
21 had been threatened by multiple individuals who claimed they would easily be able
22 to steal my guns from me.

23 8. Sheriff McDonnell denied my application for lack of “good cause” because
24 according to the him, I did not face a significant enough threat to warrant a Carry
25 License.

26 9. I do not currently qualify for any of the exceptions to California’s carry
27 restrictions that would allow me to carry a firearm outside my home for self-defense
28 in some manner.


1 10. I fear that if I am attacked, I will not be able to protect myself, because I
2 cannot lawfully carry a firearm outside my home in any manner.

3 11. I wish to immediately exercise my constitutional right to carry a firearm in
4 public for self-defense, but I am precluded from doing so because I am unable to
5 obtain a license to carry a firearm and California generally prohibits me from
6 carrying a firearm in any manner, openly or concealed, without such a license.

7 12. But for California's comprehensive restrictions on the public carriage of
8 firearms and my inability to obtain a Carry License, I would lawfully carry a
9 firearm in non-sensitive public places for self-defense, but I refrain from doing so
10 for fear of liabilities for violating one or more of California's laws that criminalize
11 my doing so.

12 13. I am thus completely barred from exercising my right to bear arms for
13 self-defense without risking criminal prosecution.

14 I declare under penalty of perjury that the foregoing is true and correct.
15 Executed within the United States on September 11, 2017.

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19 Samuel Golden
20 Declarant
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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

Case Name: *Flanagan, et al. v. California Attorney General Xavier Becerra, et al.*
Case No.: 2:16-cv-06164-JAK-AS

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**DECLARATION OF SAMUEL GOLDEN IN SUPPORT OF PLAINTIFFS'
MOTION FOR SUMMARY JUDGMENT**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Xavier Becerra, Attorney General of California	<i>Attorneys for Attorney</i>
P. Patty Li, Deputy Attorney General	<i>General of the State of</i>
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Jonathan M. Eisenberg, Deputy Attorney General	
E-mail: Jonathan.Eisenberg@doj.ca.gov	
300 South Spring Street, Suite 1702	
Los Angeles, CA 90013	

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 11, 2017

/s/ Laura Palmerin

Laura Palmerin