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Attorneys for Petitioners-Plaintiffs

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
CENTRAL DISTRICT

TURNER’S OPERATIONS, INC., a
California corporation; TRADERS LOAN
AND JEWELRY, INC., a California
corporation; FFLGuard, LLC, a Delaware
limited liability company; and CALIFORNIA
RIFLE & PISTOL ASSOCIATION,
INCORPORATED, a California corporation,

Petitioners-Plaintiffs,

v.

ERIC GARCETTI, in his official capacity as
Mayor of the City of Los Angeles;
MICHAEL N. FEUER, in his official
capacity as City Attorney of the City of Los
Angeles; MICHAEL MOORE, in his official
capacity as Chief of the Los Angeles Police
Department; CITY OF LOS ANGELES; and
DOES 1-25,

Respondents-Defendants.

Case No.: 20STCP01258

**SUPPLEMENTAL DECLARATION OF
BILL ORTIZ IN SUPPORT OF EX PARTE
APPLICATION TO STAY
ENFORCEMENT OF LOS ANGELES
ORDER REQUIRING LICENSED
FIREARM DEALERS TO CLOSE OR
ALTERNATIVELY, FOR TEMPORARY
RESTRAINING ORDER AND ORDER TO
SHOW CAUSE**

Hearing Date: April 13, 2020
Hearing Time: 8:30 a.m.
Department: 1

Action Filed: April 3, 2020

SUPPLEMENTAL DECLARATION OF BILL ORTIZ

I, Bill Ortiz, declare:

1. I am the Vice President of Compliance of Turner's Operations, Inc. d/b/a Turner's Outdoorsman ("Turner's"), one of the petitioners in this action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. On April 9, 2020, I submitted a declaration in support of an ex parte application to stay enforcement of the order from the City of Los Angeles requiring Turner's to close its Reseda location.

3. Since submitting my original declaration, I have become aware that another plaintiff-petitioner in this action, Traders Loan, has received clarification from the City of Los Angeles that it may continue to engage in the business of selling and transferring firearms because it is considered a "financial institution" and therefore an "essential business" within the meaning of the City's Order. It is also my understanding that Traders Loan is considered a "financial institution" because it holds a secondhand dealer's license jointly approved and issued by City of Los Angeles and California Department of Justice allowing Traders Loan to engage in activities that include firearms taken in trade, taken in pawn, accepted for sale on consignment, or accepted for auction.

4. Turner's Reseda location, which has been ordered closed by the City of Los Angeles, holds the same secondhand dealer's license as Trader's Loan, thereby lawfully allowing Tuner's Reseda location to engage in activities that include firearms taken in trade, taken in pawn, accepted for sale on consignment, or accepted for auction.

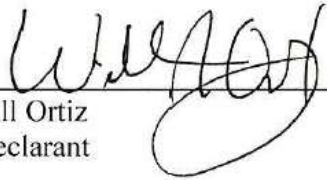
5. In addition to firearms, Turner's Reseda location also services the fishing industry and law enforcement personnel, which according to the Mayor's revised April 10, 2020, order are both included among those activities that are considered "essential." This includes sales of firearms and ammunition to officers of the Los Angeles Police Department.

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

3 Executed on April 13, 2020, at Rancho Cucamonga, California.

4
5 
6 Bill Ortiz
Declarant

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF LOS ANGELES

4 I, Laura Palmerin, 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 Boulevard, Suite 200, Long Beach, California 90802.

7 On April 13, 2020, I served the foregoing document(s) described as

8 **SUPPLEMENTAL DECLARATION OF BILL ORTIZ IN SUPPORT OF EX PARTE**
9 **APPLICATION TO STAY ENFORCEMENT OF LOS ANGELES ORDER REQUIRING**
10 **LICENSED FIREARM DEALERS TO CLOSE OR ALTERNATIVELY, FOR**
11 **TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE**

12 on the interested parties in this action by placing

13 [] the original

14 [X] a true and correct copy

15 thereof by the following means, addressed as follows:

16 Benjamin F. Chapman, Deputy City Attorney

17 Email: benjamin.chapman@lacity.org

18 Jonathan H. Eisenman, Deputy City Attorney

19 Email: jonathan.eisenman@lacity.org

20 200 North Main Street, 7th Floor, City Hall East

21 Los Angeles, CA 90012

22 Fax No.: (213) 978-0763

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

_____ X (BY ELECTRONIC MAIL) As follows: I served a true and correct copy by electronic
transmission to the emails shown above. Said transmission was reported and completed
without error.

_____ X (STATE) I declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct.

Executed on April 13, 2020, at Long Beach, California.



Laura Palmerin