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6 Attorneys for Plaintiffs
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 NATIONAL RIFLE ASSOCIATION OF
AMERICA; JOHN DOE,

11 Plaintiffs,

12 vs.

13 CITY OF LOS ANGELES; ERIC
14 GARCETTI, in his official capacity as
Mayor of City of Los Angeles; HOLLY
15 L. WOLCOTT, in her official capacity as
City Clerk of City of Los Angeles; and
16 DOES 1-10,

17 Defendants.
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Case No.: 2:19-cv-03212 SVW (GJSx)

**SUPPLEMENTAL
DECLARATION OF TIFFANY D.
CHEUVRONT IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES**

Hearing Date: June 15, 2020
Hearing Time: 1:30 p.m.
Judge: Stephen V. Wilson
Courtroom: 10A

1 **SUPPLEMENTAL DECLARATION OF TIFFANY D. CHEUVRONT**

2 I, Tiffany D. Cheuvront, declare as follows:

3 1. I am an attorney licensed to practice law in the state of California and
4 before the United States District Court for the Central District of California. I am an
5 attorney at the law firm Michel & Associates, P.C. (“MAPC”), attorneys of record
6 for Plaintiffs in this action. I have personal knowledge of the facts set forth herein
7 and, if called and sworn as a witness, could and would testify competently thereto.

8 2. I have over 20 years of experience working on local, state, and federal
9 government issues. I was a registered lobbyist for the state of Tennessee, where I
10 worked to make changes to state law and policies on behalf of nonprofit
11 organizations. After moving to California, I was in a position to oversee state
12 legislative efforts and the lobbying personnel for a nonprofit organization.

13 3. For more than 7 years, I served on the National Tribal Budget
14 Committee, where I gained experience developing federal policy for Indian tribal
15 governments and working with Tribal governments across the nation in concerted
16 efforts around policy.

17 4. I have drafted Congressional testimony and provided testimony at
18 federal hearings while working with members of Congress on legislative issues. And
19 I have served on various stakeholder groups to develop policy alongside elected
20 officials at the local, state, and federal levels.

21 5. Within my first year at Michel & Associates, I took over the firm’s local
22 legislative advocacy efforts on behalf of our clients, the California Rifle & Pistol
23 Association, Incorporated, and the National Rifle Association of America. In that
24 role, I track and monitor ongoing local efforts throughout the state to pass firearm-
25 related ordinances and resolutions. I work with advocates and elected officials
26 throughout the state, researching and drafting position letters and legal opinions
27 about the constitutional implications of proposed local gun laws. And I travel around
28 the state on behalf of clients to speak at legislative hearings and provide testimony

1 on proposed local actions.

2 6. In addition to my work on local advocacy at Michel & Associates, my
3 main focus is civil litigation, with a concentration on civil rights and constitutional
4 law. For example, most recently, I served on the team that litigated *B&L*
5 *Productions, Inc. v. 22nd District Agricultural Association*, S.D. Cal. Case No. 19-
6 cv-00134, a First Amendment challenge to the 22nd DAA’s 2019 moratorium on
7 gun show events at the Del Mar Fairgrounds. *B&L Productions* is similar in both
8 issue and argument to the matter at hand. Both involve issues of First Amendment
9 discrimination against my clients with associational and direct standing. And both
10 received lengthy constitutional analyses from the reviewing court in support of our
11 arguments. The *B&L Productions* matter resulted in a favorable decision granting
12 preliminary injunctive relief and ordering the DAA to reinstate the gun show while
13 litigation proceeded. Almost immediately after the district court granted that relief,
14 the DAA reached out to settle plaintiffs’ claims. The parties have since successfully
15 settled, and the case was dismissed.

16 7. Notably, after we successfully obtained preliminary relief in the *B&L*
17 *Productions* case, I was contacted by a board member of the First Amendment
18 Coalition (and retired judge) to ask if my firm’s work on the case could be presented
19 to the organization’s members as a “textbook” argument on the relevant First
20 Amendment issues for associations.

21 8. For this matter against the Los Angeles disclosure ordinance, I was
22 responsible for researching, compiling, and analyzing the legislative history,
23 newspaper articles, social media postings, and other evidence necessary to prove the
24 City’s unlawful intent. I essentially monitored all of the City’s actions which
25 culminated in the enactment of the ordinance.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed within the United States on June 1, 2020.



Tiffany D. Chevront
Declarant

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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *National Rifle Association, et al., v. City of Los Angeles, et al.*
Case No.: 2:19-cv-03212 SVW (GJSx)

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:

**SUPPLEMENTAL DECLARATION OF TIFFANY D. CHEUVRONT IN
SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES**

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

Benjamin F. Chapman
Los Angeles City Attorney
200 N. Main St., Suite 675
Los Angeles, CA 90012
benjamin.chapman@lacity.org
Attorneys for Defendants

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

Executed June 1, 2020.

s/ Laura Palmerin

Laura Palmerin