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Attorney for Plaintiff Second Amendment Foundation

IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED;
SECOND AMENDMENT
FOUNDATION; GUN OWNERS OF
CALIFORNIA, INC,

Plaintiffs,

v.

CITY OF GLENDALE; GLENDALE
CHIEF OF POLICE CARL
POVILAITIS, in his official capacity;
GLENDALE CITY CLERK SUZIE
ABAJIAN, in her official capacity; and
DOES 1-10,

Defendants.

CASE NO: 2:22-cv-07346-SB-JC

**DECLARATION OF SAM PAREDES
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

42 U.S.C. §§ 1983 & 1988

Hearing Date: December 2, 2022

Hearing Time: 8:30 a.m.

Courtroom: 6C

Judge: Hon. Stanley Blumenfeld Jr

DECLARATION OF SAM PAREDES

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2 1. I, Sam Paredes, am the Executive Director of Gun Owners of California, Inc.
3 (“GOC”), a plaintiff in the above-entitled action. I make this declaration of my own
4 personal knowledge and, if called as a witness, I could and would testify
5 competently to the truth of the matters set forth herein.

6 2. GOC is recognized as a 501(c)(4) non-profit mutual benefit corporation
7 under the Internal Revenue Code and a recognized non-profit membership
8 corporation under the state of California. GOC is incorporated in the state of
9 California and is currently headquartered in El Dorado Hills, California.

10 3. GOC is dedicated to the preservation and restoration of the Second
11 Amendment in California. It was formed for the express purpose of promoting,
12 encouraging, and advocating for the purchase, use, and ownership of firearms and
13 related products. GOC opposes legislation that it deems harmful to the right to keep
14 and bear arms, while fighting to protect the Second Amendment rights of all
15 Californians at the capitol, in the courts, and through elections. GOC strongly
16 believes that the rights enshrined in the Second Amendment guarantees those
17 enshrined by the First Amendment.

18 4. Many GOC members in Southern California have valid and current
19 concealed carry weapon (“CCW”) permits, which enables them to lawfully carry a
20 concealed firearm in public, so that they can defend themselves (and potentially
21 others) with lethal force in the event of a life-threatening emergency situation.

22 5. Glendale Municipal Code generally bans possession on “city property” of
23 any ammunition or firearm, whether loaded or unloaded. The term “city property”
24 is defined to include effectively all public property within the City of Glendale, as
25 well as some private property, with the only exception being streets/roads and
26 sidewalks.

27 6. This includes, at minimum, 47 parks and recreation facilities, all City
28 playgrounds, eight public libraries, three downtown parking structures and other

1 City-owned or operated parking lots, the Glendale Civic Auditorium and civic
2 center complex, a youth center, an emergency center, undefined “open spaces” and
3 “plazas”, and an unknowable amount of properties in the possession of private
4 companies or individuals under contract with the city.

5 7. In sum, other than streets/roads and sidewalks, the Ordinance makes it
6 unlawful for the typical, law-abiding person to possess a firearm or ammunition on
7 any public property (or publicly controlled property) in the City of Glendale.

8 8. Glendale’s Ordinance most burdens GOC members who either live in
9 Glendale or travel to the City on a regular basis. It prevents them from carrying in
10 non-sensitive places where they should be allowed to do so based on the Supreme
11 Court’s recent landmark ruling in *New York State Rifle & Pistol Association v.*
12 *Bruen*. The result is that the utility of their CCWs permit, and thus their right to be
13 armed for self-defense in public, is severely curtailed or outright eliminated when
14 they visit the City of Glendale.

15 9. Moreover, many GOC members would likely not even *know* they are
16 breaking the law, because Glendale has no requirement mandating that places
17 where firearm possession is prohibited post signs saying so. GOC members, like all
18 other citizens who legally carry, would have little reason to assume that they are not
19 allowed to carry in, for example, a parking structure, a library, or a park. They thus
20 may find themselves in legal jeopardy if they are ever caught with a firearm they
21 had no idea they were not allowed to possess at a particular city-owned location.

22 10. This is an especially precarious situation for GOC members with carry
23 permits who *don’t* live in or regularly go to Glendale, but do go there from time to
24 time. Such individuals are even less likely to be aware of Glendale’s Ordinance
25 given their limited interaction with the City.

26 11. In sum, Glendale’s Ordinance violates the Second Amendment by restricting
27 the right to carry in clearly non-sensitive places, with no exception for people who
28 have a CCW permit. This law negatively affects GOC members who have CCW

1 permits and live in Glendale or visit the City, especially those who have no idea
2 that they are breaking the law because they are not on notice that they are doing so.

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

4 Executed within in the United States on October 20, 2022.

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8 Sam Paredes, declarant
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