

C. D. Michel – SBN 144258
cmichel@michellawyers.com
Joshua Robert Dale – SBN 209942
jdale@michellawyers.com
Konstadinos T. Moros – SBN 306610
kmoros@michellawyers.com
Alexander A. Frank – SBN 311718
afrank@michellawyers.com
MICHEL & ASSOCIATES, P.C.
180 E. Ocean Blvd., Suite 200
Long Beach, CA 90802
Telephone: (562) 216-4444
Facsimile: (562) 216-4445
www.michellawyers.com

Attorneys for Plaintiffs California Rifle & Pistol Association, Incorporated and Gun Owners of California, Inc.

Donald Kilmer-SBN 179986
Law Offices of Donald Kilmer, APC
14085 Silver Ridge Road
Caldwell, Idaho 83607
Telephone: (408) 264-8489
Email: Don@DKLawOffice.com

Attorney for Plaintiff The Second Amendment Foundation

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

CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED;
THE SECOND AMENDMENT
FOUNDATION; and 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 KONSTADINOS
T. MOROS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

**Hearing Date: December 2, 2022
Hearing Time: 8:30 a.m.
Courtroom: 6C
Judge: Hon. Stanley Blumenfeld Jr.**

1 I, Konstadinos T. Moros, declare:

2 1. I am a member of the bar of the State of California. I am an attorney at
3 law duly licensed to practice in the State of California and before the District Court
4 for the Central District of California. I am counsel of record for Plaintiffs in this
5 action. I submit this declaration in support of Plaintiffs' Reply Brief in Support of
6 Plaintiffs' Motion for Preliminary Injunction in this matter. I have personal
7 knowledge of the facts stated below, and if I were to be called as a witness, I could
8 and would competently testify under oath as to the matters herein.

9 2. In addition to being one of their attorneys, I am also a dues-paying
10 member of Plaintiff California Rifle & Pistol Association, Incorporated, one of the
11 Plaintiffs in this matter.

12 3. I have a valid license to carry a concealed firearm, issued to me by the
13 Los Angeles County Sheriff. I also previously had a license issued to me by the San
14 Diego County Sheriff when I lived in San Diego County. In order to get such a
15 license in California, I needed to have a background check completed by the
16 California Department of Justice, go through an in-person interview, and complete
17 a safety course and shooting qualification. In total, I have carried daily for years
18 without incident.

19 4. I choose to carry everywhere I go (except where carry is legally
20 prohibited) because I understand that while the need for armed self defense is
21 relatively rare, it isn't about the odds, it's about the stakes. I am married and will
22 soon be a father. I will never allow myself to be the helpless victim of a violent
23 crime and thereby put my family's future at risk. I hope that I will never have to
24 draw my pistol in public, and would only do so to protect myself, my family, or
25 another innocent person from imminent death or serious bodily injury.

26 5. As my wife's family lives in Pasadena, trips to Glendale are frequent
27 for us. My wife and I, and sometimes her family as well, like to go to the
28 Americana at Brand, and when we do, we park at the nearby city-owned parking

1 structures.

2 6. My wife has her Ph.D. in history and teaches history both at the high
3 school and college level, so she often spends time at the Glendale Central Library
4 on Harvard Street. I have frequently accompanied her on her trips to that library.
5 We have also been to parks in Glendale, and other places that would fall under the
6 category of “plazas” or “open space.”

7 7. As I stated previously, I carry everywhere I am legally allowed to do
8 so. Glendale Municipal Code 9.25.040 stops me from carrying in places in
9 Glendale I otherwise would carry in. In doing so, it adds nothing to public safety. I
10 was never any threat in the first place, as I would only ever draw my handgun from
11 concealment for lawful self defense, never to threaten or hurt another person. Yet I
12 am well aware that people with criminal intent could not care less about Glendale’s
13 Ordinance. It does nothing but create “soft targets” for criminals ranging from run
14 of the mill armed robbers all the way up to potential mass killers.

15 8. Because I tend to park most often in the City-owned parking structures
16 near the Americana at Brand, I cannot even bring my firearm with me and leave it
17 locked up in my car because I am technically still in possession of a firearm when I
18 enter the parking structure, even if it is locked up in my vehicle. None of the
19 exceptions listed in Glendale Municipal Code 9.25.050 reference firearms that are
20 stored in vehicles.

21 9. Prior to discovering the existence of Glendale’s Ordinance, I likely
22 accidentally carried on Glendale City Property in violation of the Ordinance on
23 previous trips to the City. While I am always careful to comply with signs that say
24 guns are not allowed in a particular location, I do not recall any such signs being
25 posted on various City property. If I did cross onto City property during those trips,
26 I would have had no notice that I was violating the Ordinance.

27 10. But for Glendale’s Ordinance, I would continue to carry everywhere I
28 went in the City, except for truly sensitive places like schools and courthouses

1 where carry is already legally prohibited anyway under state or federal laws.
2 Glendale's Ordinance violates my Second Amendment right to carry and puts my
3 family's safety in danger, as it similarly harms all of Plaintiff CRPA's members
4 with CCW permits who live in or travel to the City.

5 I declare under penalty of perjury of the laws of the State of California and
6 the United States that the foregoing is true and correct. Executed within the United
7 States on November 09, 2022.

8 *s/Konstadinos T. Moros*

9 Konstadinos T. Moros, declarant
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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *California Rifle and Pistol Association, v. City of Glendale, et al.*
Case No.: 2:22-cv-07346-SB-JC

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 KONSTADINOS T. MOROS IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

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

Michael J. Garcia, City Attorney
Edward B. Kang, Principal Assistant City Attorney
ekang@glendaleca.gov
613 E. Broadway, Suite 220
Glendale, CA 91206
Attorney for Defendants

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

Executed November 9, 2022.


Christina Castron