

1 C. D. Michel – SBN 144258  
cmichel@michellawyers.com  
2 Joshua Robert Dale – SBN 209942  
jdale@michellawyers.com  
3 Konstadinos T. Moros – SBN 306610  
kmoros@michellawyers.com  
4 Alexander A. Frank – SBN 311718  
afrank@michellawyers.com  
5 MICHEL & ASSOCIATES, P.C.  
180 E. Ocean Blvd., Suite 200  
6 Long Beach, CA 90802  
Telephone: (562) 216-4444  
7

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

11 Attorneys for Plaintiffs

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED; THE  
15 SECOND AMENDMENT FOUNDATION;  
GUN OWNERS OF AMERICA, INC.;  
16 GUN OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
17 ERICK VELASQUEZ, an individual;  
CHARLES MESSEL, an individual;  
18 BRIAN WEIMER, an individual;  
CLARENCE RIGALI, an individual;  
19 KEITH REEVES, an individual, CYNTHIA  
GABALDON, an individual; and  
20 STEPHEN HOOVER, an individual,

21 Plaintiffs,

22 v.

23 LOS ANGELES COUNTY SHERIFF’S  
DEPARTMENT; SHERIFF ROBERT  
LUNA, in his official capacity; LA VERNE  
24 POLICE DEPARTMENT; LA VERNE  
CHIEF OF POLICE COLLEEN FLORES,  
25 in her official capacity; ROBERT BONTA,  
in his official capacity as Attorney General  
26 of the State of California; and DOES 1-10,

27 Defendants.  
28

Case No.: 8:23-cv-10169-SPG  
(ADSx)

**DECLARATION OF BRIAN  
WEIMER IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: March 13, 2024  
Hearing Time: 1:30 p.m.  
Courtroom: 5C  
Judge: Hon. Sherilyn Peace Garnett

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF BRIAN WEIMER**

1. I, Brian Weimer, am a plaintiff in the above-entitled 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. I am a current resident of Los Angeles County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

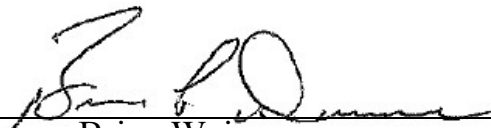
4. I am employed by Los Angeles County as a firefighter on Catalina Island.

5. I submitted a CCW permit application with the Los Angeles County Sheriff's about a year ago, in January of 2023. As of the date of this declaration, I still have not received a permit.

6. As I understand from other applicants including other plaintiffs in this matter, I likely have at least six more months of waiting left to go, and maybe more. I hope this Court will vindicate my right to carry and order LASD to either process permits rapidly, or allow me to carry pending the outcome of my application. Otherwise, my right to carry is being denied to me for extraordinary amounts of time.

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

Executed within the United States on January 12, 2024.

  
\_\_\_\_\_  
Brian Weimer  
Declarant

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

Case Name: *California Rifle and Pistol Association, et al., v. Los Angeles County Sheriff's Dept., et al.*

Case No.: 8:23-cv-10169-SPG (ADSx)

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 BRIAN WEIMER IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

on the following parties, as follows:

Mark R Beckington  
Jane E. Reilley  
Christina R.B. Lopez, Deputy Attorney General  
California Department of Justice  
Office of the Attorney General  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013-1230  
[jane.reilley@doj.ca.gov](mailto:jane.reilley@doj.ca.gov)  
[Christina.Lopez@doj.ca.gov](mailto:Christina.Lopez@doj.ca.gov)  
*Attorney for Defendants*

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

Additionally, the following parties were served by transmitting a true copy via electronic mail as follows:

Dawyn R. Harrison, County Counsel  
Caroline Shahinian, Deputy County Counsel  
Office of the County Counsel  
500 W Temple St Ste 648  
Los Angeles, CA 90012-3196  
[cshahinian@counsel.lacounty.gov](mailto:cshahinian@counsel.lacounty.gov)

*Attorneys for Defendants Los Angeles County Sheriff's Department and Sheriff Robert Luna*

Bruce A. Lindsay  
Monica Choi Arredondo  
JONES MAYER  
3777 N. Harbor Blvd.  
Fullerton, CA 92835  
[bal@jones-mayer.com](mailto:bal@jones-mayer.com)  
[mca@jones-mayer.com](mailto:mca@jones-mayer.com)

*Attorneys for Defendants La Verne Police Department and La Verne Chief of Police Colleen Flores*

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

Executed January 26, 2024

  
Christina Castron

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28