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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 CHARLES
MESSEL 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

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DECLARATION OF CHARLES MESSEL

1. I, Charles Messel, 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 a Navy veteran, a property owner, a member of the local yacht club, and a volunteer contractor for the communications department of the Monrovia Police Department, where I help keep several emergency amateur radio repeaters running for the department. For this volunteering role I had to pass a livescan background check to confirm I was a law-abiding citizen.

5. I submitted a CCW permit application with the Los Angeles County Sheriff's Department all the way back on July 1, 2022. As of the date of this declaration, I still have not received a permit.

6. In April of 2023, I reached out to find out what was taking so long. The response I received stated "We were several months behind in opening and entering applications in our tracking system. Although you applied earlier, your application wasn't entered into our tracking system until 11/2/22. We are currently working on applications that went into our tracking system in July of 2022. Thank you for your patience."

7. As of the date of this declaration my application is over 18 months old. This is a ridiculous situation, and LASD is not treating this with the urgency due a constitutional right. 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.

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I declare under penalty of perjury that the foregoing is true and correct.
Executed within the United States on January 12, 2024.



Charles Messel
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, 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 CHARLES MESSEL 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
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jane.reilley@doj.ca.gov
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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:

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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

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