

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 CYNTHIA
GABALDON 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 CYNTHIA GABALDON

1. I, Cynthia Gabaldon, 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 and reside within the City of La Verne.

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.

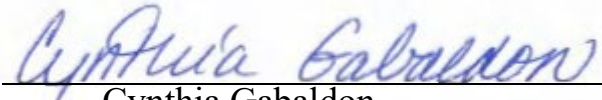
4. I have owned and trained with firearms for most of my life.

5. Encouraged by the Supreme Court’s ruling in *Bruen*, I decided it was time to obtain a CCW permit. Unfortunately, the exorbitant fees La Verne charges have dissuaded me from applying. I am self-employed and have a son in college, so an extra \$1,000 expense is too much for me at this time. I am thus priced out of a constitutional right.

6. On principle, I also do not want to subject myself to the psychological examination requirement, something that most issuing authorities in California (including LASD) do not require.

7. I hope this Court will force La Verne to reduce its fees and drop its psychological examination. I am also willing to instead obtain an Arizona CCW permit, which is far more affordable, if this Court orders California to honor the permits of other states.

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



Cynthia Gabaldon
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 CYNTHIA GABALDON 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
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

*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
mca@jones-mayer.com

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

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

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

Executed January 26, 2024


Christina Castron