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

**DECLARATION OF DAVID
BROADY 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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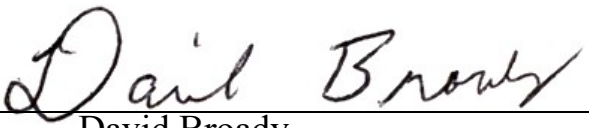
DECLARATION OF DAVID BROADY

I, David Broady, declare as follows:

1. I am a resident of Nevada, and make this Declaration stating my personal knowledge of the following set forth herein.
2. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or any state. I am a member of the California Rifle & Pistol Association, a plaintiff in this matter.
3. I am a retired California prosecutor, last working as a Senior Deputy District Attorney for the Placer County DA’s office from 1995 to 2020. Before that, I worked in the Riverside County DA’s office from 1991 to 1995. I had California CCW permits in Riverside County and later Placer County, from the early 1990s until 2020 when I moved to Nevada. Since then I have had a Nevada CCW permit, but I cannot obtain a California CCW permit to allow me to exercise my right to carry in the Golden State. California also will not honor my Nevada permit.
4. I frequently am in California because I still own property in Placer County, and I visit family in the foothills, the Bay Area and San Diego. I also remain an active member of both the California and Nevada State Bars.
5. I urge this Court to grant Plaintiffs’ requested motion for preliminary injunction and force California to honor my Nevada CCW permit. Alternatively, California should at least allow me to apply to obtain a California CCW permit, so I can once again carry in the state as I did for almost 30 years. But should the Court decide to go that route, I hope it requires California to have a quick and affordable process, I should not have to wait many months and pay high fees just to exercise a constitutional right I already have a permit for in another state.

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I declare under penalty of perjury that the foregoing is true and correct.
Executed within the United States on January 15, 2024.



David Broady
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 DAVID BROADY IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

on the following parties, as follows:

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Christina R.B. Lopez, Deputy Attorney General
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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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I declare under penalty of perjury that the foregoing is true and correct.

Executed January 26, 2024


Christina Castron