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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 JACK
SKADSEM 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 JACK SKADSEM

I, Jack M. Skadsem, declare as follows:

1. I am a resident of Los Angeles County, California, 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 the state of California. I am a member of the California Rifle & Pistol Association, a plaintiff in this matter.

3. In the wake of *Bruen*, I applied for a CCW permit with the Los Angeles County Sheriff’s Department. My application was hand delivered on July 8, **2022**. I have followed all LASD requirements in relation to this process and yet am still waiting for a permit.

4. In the first week of November 2023, around 16 months after I had delivered my application, I called to inquire what was taking so long. I was told my application was “entered into the system” on October 31, 2022, just over a year prior, but no investigator had yet been assigned to my case.

5. On January 10, 2024, I received both an email and voice mail from LASD requesting scanned copies of my current driver’s license and a utility bill. I was told these documents were required before an investigator could be assigned. I tried to return the telephone call several times over the next two days but never could reach the LASD employee who had called me. I emailed the requested documents within hours of the email from LASD on January 10.

6. On January 18, 2024, I received a telephonic interview with the CCW Unit and spoke with Deputy Yoon. The Deputy was very professional, and I believe the call went smoothly. However, I was disappointed to hear that it would be approximately *three more months* before I will get approval to proceed to training, and then an uncertain amount of time after that to be issued my permit.

7. My story stands as an example of how long LASD is taking to process CCW permits – over 18 months so far, with a minimum of at least three more

1 months to go. It could very well be a two-year total process by the time a permit is
2 issued. This is a serious violation of my constitutional rights, and I submit that this
3 Court should grant Plaintiffs' requested motion for preliminary injunction.

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I declare under penalty of perjury that the foregoing is true and correct.
Executed within the United States on January 18, 2024.



Jack Skadsem

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 JACK SKADSEM 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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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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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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