

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 KEITH  
REEVES 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 KEITH REEVES**

1. I, Keith Reeves, 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, the Second Amendment Foundation, and Gun Owners of America, all of which are also plaintiffs in this matter.

4. I possess both Arizona and Utah CCW permits, both of which required background checks and safety courses to obtain. These permits are, without any good reason, not honored by California. I am also an NRA-certified pistol instructor and range safety officer.

5. I applied for a CCW permit in January 2014 with La Verne Police Department, and was denied in May 2015 because he was deemed to lack sufficient “good cause,” a criterion the Supreme Court struck down in *Bruen* seven years later. I wish to reapply for a permit but cannot afford to do so due to the excessive application and issuance fees charged by La Verne. Paired with the cost of training and livescan, I will have to spend around \$1,000 or more to exercise this 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, or in the alternative, force California to honor my Arizona and Utah CCW permits.

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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.



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Keith Reeves  
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 KEITH REEVES 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