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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 SHERWIN  
DAVID PARTOWASHRAF 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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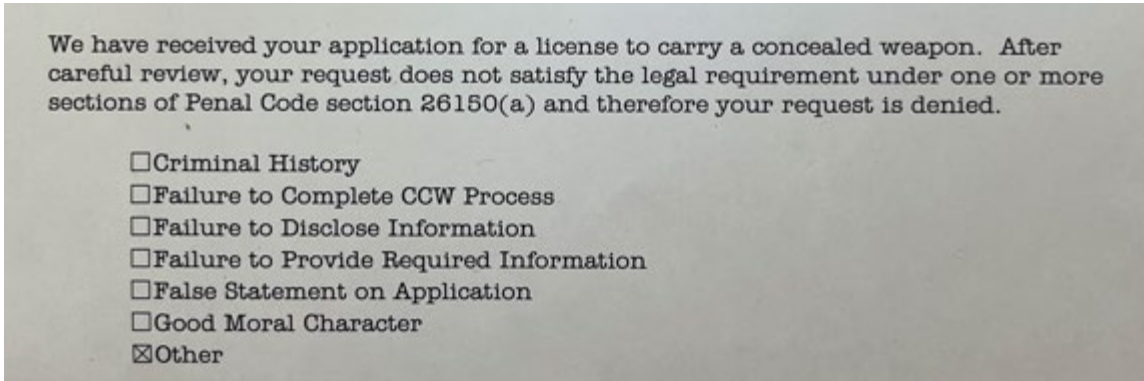
**DECLARATION OF SHERWIN DAVID PARTOWASHRAF**

I, Sherwin Partowashraf, 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.

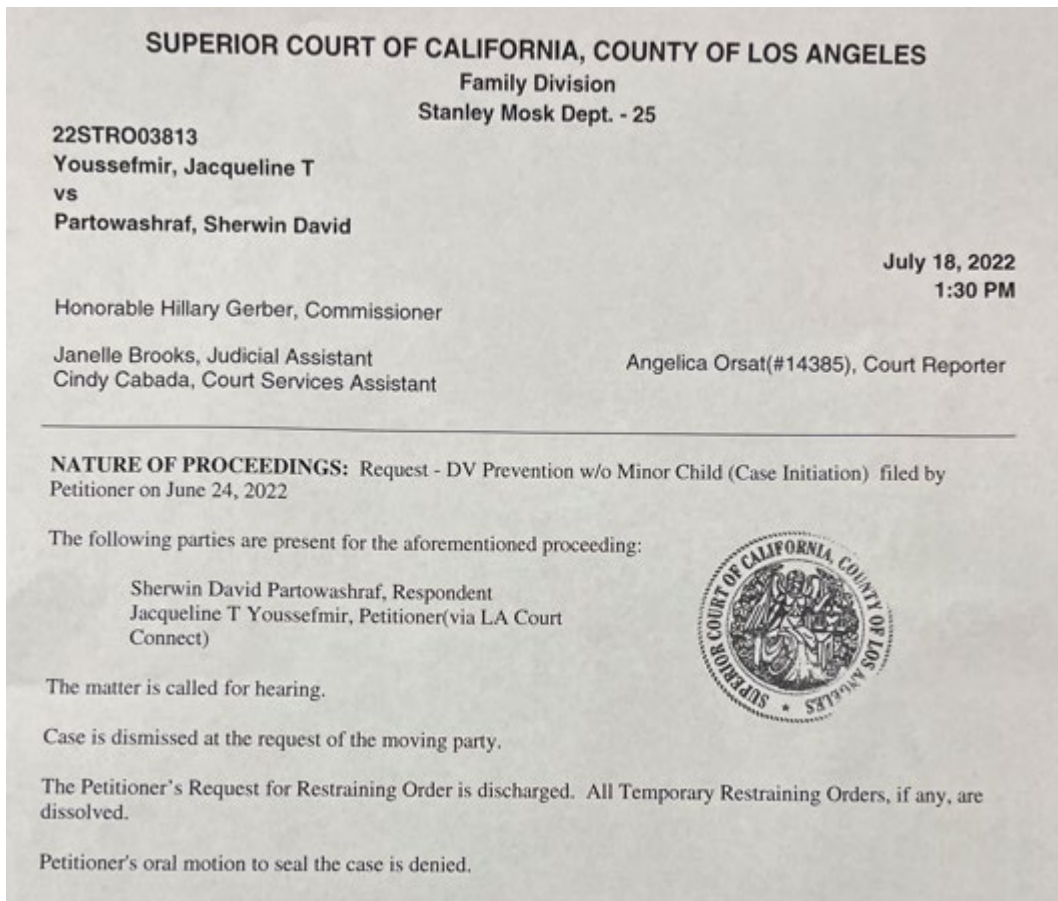
3. After waiting over a year and a half on my application, on October 3, 2023, my application for a CCW permit was denied by the Los Angeles County Sheriff’s Department. Even though California law requires a reason for the denial be given, the reasoning for the denial was nothing more than a checkmark next to “other”:



4. When I called and spoke to a Sergeant employed by LASD, he explained that I was denied because someone had filed a temporary restraining order against me last year. I responded to him that the case had been dismissed as without merit and the judge dissolved the temporary restraining order. It did not matter, that was apparently enough to deny me my constitutional right to bear arms. The Sergeant also erroneously claimed California was a “may issue” state, and told me there was no appeals process.

5. The temporary restraining order was filed by an ex-girlfriend against

1 me after an attempt to extort me had failed. I attended a hearing at Stanley Mosk  
2 Courthouse, as did she, and at that hearing, she asked that the case be dismissed.  
3 She also asked that the proceedings be sealed to hide what she did, which I  
4 opposed, and thankfully the judge denied that oral motion.



20 6. When I had initially received the temporary restraining order, I  
21 complied and surrendered my firearms to the West Valley Police station. After the  
22 order was dissolved, I was able to pick up my firearms from the police.

23 7. None of this information was withheld from LASD. During the  
24 interview for my CCW, I informed the interviewing officer of the complete history  
25 of the temporary restraining order and its dissolution, and provided LASD a copy of  
26 the minute order included above.

27 8. I should not have my constitutional right denied to me because of false  
28 claims against me that were immediately dismissed once they came before a judge.

1 If I were a danger to anyone, my firearms would not have been returned to me  
2 following the dissolution of the temporary restraining order.

3 9. The Second Amendment is critically important to me. Last year, I was  
4 the victim of a home invasion, and the district attorney prosecuted the criminal  
5 involved. Thankfully, I was not harmed. But due to LASD's unconstitutional denial  
6 of my CCW permit, if I face a similar danger out in public, I will have no effective  
7 means of self defense.

8 10. My right to carry depends on this Court confirming that LASD may  
9 not use unconstitutional criteria to deny CCW permit applications. Temporary  
10 restraining orders that are ultimately dissolved are not grounds for the denial of  
11 constitutional rights. I hope this Court grants Plaintiffs' requested injunction in full.

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

13 Executed within the United States on January 15, 2024.

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17 Sherwin David Partowashraf  
18 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 SHERWIN DAVID PARTOWASHRAF 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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Office of the Attorney General  
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[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:

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Caroline Shahinian, Deputy County Counsel  
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*Attorneys for Defendants La Verne Police Department and La Verne Chief of Police Colleen Flores*

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

Executed January 26, 2024

  
Christina Castron