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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 STEPHEN  
HOOVER 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 STEPHEN HOOVER**

1. I, Stephen Hoover, 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 resident of the State of Florida. I am a PhD candidate at the Center for Complex Systems and Brain Sciences in the Charles E. Schmidt College of Science at Florida Atlantic University. I am a citizen of the United States who is not prohibited from owning or possessing firearms under state or federal law. I own firearms and have a Florida-issued CCW permit. I am a member of the California Rifle & Pistol Association and the Second Amendment Foundation, both which are plaintiffs in this action.

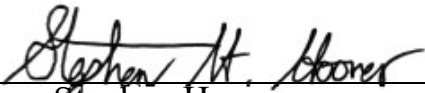
3. I spent a significant amount of time in California in the Summer of 2023, and I plan to return for work and/or leisure purposes.

4. While I was in California last summer, I sought to obtain a California CCW permit from the Monterey County Sheriff’s Department, as California would not honor my Florida CCW permit, but I still desired to be able to exercise my right to carry for self-defense. Yet in spite of otherwise meeting the criteria for eligibility, my application was denied because I was deemed ineligible for a CCW permit under Penal Code Section 26150(a)(3), as I am not a resident of the county I applied in, nor a resident of California.

5. I believe California’s total prohibition on nonresident carry is unconstitutional. All of my other constitutional rights are present when I visit California, the right to bear arms should be as well. California should have to honor my Florida permit.

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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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Stephen Hoover  
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 STEPHEN HOOVER 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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[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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*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