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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 WOODROW
STALTER 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

DECLARATION OF WOODROW STALTER

I, Woodrow R. Stalter, 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. I have applied for a CCW permit with the Los Angeles County Sheriff’s Department. I mailed in my application on July 11, **2022**. I know it was received because I sent it via certified mail with a return receipt, and I received the return receipt indicating the application got to LASD. I have followed all LASD requirements in relation to this process and yet am still waiting for a permit.

4. On November 28, 2022, I emailed to check in on when I could expect an update and received what appeared to be a canned response.

5. On June 12, 2023, I emailed again and received a similar response.

6. On June 15, 2023, I received a call from LASD to get my livescan completed, and I did the next day.

7. The livescan cleared all three of its underlying background checks by June 22, 2023.


8. I checked in again on November 6, 2023, and December 17, 2023, and got no substantive update.

9. On January 17, 2024, LASD called me and asked for verification of my name, address, telephone number, and email. They also sent me an email asking for my driver’s license, passport, utility bill, and livescan. It’s not clear to me how much time is left in the process from here.

10. I’ve been waiting over 18 months now merely to receive permission to exercise a constitutional right. That is not acceptable to me, and so I hope Plaintiffs succeed in getting relief from this Court.

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I declare under penalty of perjury that the foregoing is true and correct.
Executed within the United States on January 17, 2024.



Woodrow Stalter
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 WOODROW STALTER IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

on the following parties, as follows:

Mark R Beckington
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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