

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 **IN THE 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.; ERICK  
17 VELASQUEZ, an individual; CHARLES  
MESSEL, an individual; BRIAN WEIMER,  
18 an individual; CLARENCE RIGALI, an  
individual; KEITH REEVES, an individual,  
19 CYNTHIA GABALDON, an individual; and  
STEPHEN HOOVER, an individual,

20 Plaintiffs,

21 v.

22  
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  
KONSTADINOS T. MOROS IN  
SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY  
INJUNCTION**

Hearing Date: March 13, 2024  
Hearing Time: 1:30 p.m.  
Courtroom: 5C  
Judge: Hon. Sherilyn Peace Garnett

1 I, Konstadinos T. Moros, declare:

2 1. I am a member of the bar of the State of California. I am an attorney at  
3 law duly licensed to practice in the State of California and before the District Court  
4 for the Central District of California. I am counsel of record for Plaintiffs in this  
5 action. I submit this declaration in support of Plaintiffs' Motion for Preliminary  
6 Injunction in this matter. I have personal knowledge of the facts stated below, and if  
7 I were to be called as a witness, I could and would competently testify under oath as  
8 to the matters herein.

9 2. On January 16, 2024, I emailed Monica Choi Arredondo, Bruce A.  
10 Lindsay, and Sandra K. Sandoval, counsel for the La Verne Police Department and  
11 La Verne Chief of Police Colleen Flores, to inquire whether the La Verne Police  
12 Department intended to raise the psychological exam fee from \$150 to \$400. On  
13 January 25, I received a response that the City's contractor had indeed increased the  
14 fee, but passing the increased cost to applicants would require City Council  
15 approval. It is not yet clear whether the City Council intends to vote to pass that  
16 expense onto applicants.

17 3. On January 24, 2024, , I visited Cumberland County's webpage titled  
18 "License to Carry Firearms", located at [https://www.cumberlandcountypa.gov/  
19 3094/License-to-Carry-Firearms](https://www.cumberlandcountypa.gov/3094/License-to-Carry-Firearms). A true and correct copy of that webpage, as it  
20 appeared when I retrieved it online, is attached as Exhibit A to Plaintiffs' Request  
21 for Judicial Notice.

22 4. On January 23, 2024, I visited the MyCCW webpage for the La Verne  
23 Police Department. MyCCW is a contractor working with the La Verne Police  
24 Department to process all CCW permit applicants. The webpage, located at  
25 <https://myccw.us/department?La-Verne-Police-Department>, links to a fee schedule  
26 that is available at [https://docs.google.com/document/d/1g\\_oOI4RbXAmUa3  
27 SiqwhFTvlBaY5ZIs\\_VOUtSdQocOEU/preview](https://docs.google.com/document/d/1g_oOI4RbXAmUa3SiqwhFTvlBaY5ZIs_VOUtSdQocOEU/preview). A true and correct copy of that fee  
28 schedule, as it appeared when I retrieved it online, is attached as Exhibit B to

1 Plaintiffs' Request for Judicial Notice.

2 5. On January 23, 2024, I visited the Arizona Department of Public  
3 Safety's Concealed Weapons and Permits webpage, located at [https://www.azdps.  
4 gov/services/public/cwp](https://www.azdps.gov/services/public/cwp). A true and correct copy of that webpage, as it appeared  
5 when I retrieved it online, is attached as Exhibit C to Plaintiffs' Request for Judicial  
6 Notice.

7 6. On January 23, 2024, I visited the Texas Department of Public  
8 Safety's Licensing and Registration webpage. That webpage, located at  
9 <https://www.dps.texas.gov/section/handgun-licensing/licensing-registration>,  
10 contains a link to a License to Carry Fee Table. A true and correct copy of that fee  
11 table, as it appeared when I retrieved it online, is attached as Exhibit D to Plaintiffs'  
12 Request for Judicial Notice.

13 7. On January 23, 2024, I visited the Utah Department of Public Safety's  
14 webpage titled "How do I apply for a Concealed Firearm Permit?", located at  
15 [https://bci.utah.gov/concealed-firearm/how-do-i-apply-for-a-concealed-firearm-  
16 permit](https://bci.utah.gov/concealed-firearm/how-do-i-apply-for-a-concealed-firearm-permit). A true and correct copy of that webpage, as it appeared when I retrieved it  
17 online, is attached as Exhibit E to Plaintiffs' Request for Judicial Notice.

18 8. On January 23, 2024, I visited the Washington Department of  
19 Licensing's webpage titled "Fees, Firearm Dealers", located at  
20 [https://www.dol.wa.gov/professional-licenses/firearms-dealers/fees-firearms-  
21 dealers](https://www.dol.wa.gov/professional-licenses/firearms-dealers/fees-firearms-dealers). A true and correct copy of that webpage, as it appeared when I retrieved it  
22 online, is attached as Exhibit F to Plaintiffs' Request for Judicial Notice.

23 9. On January 23, 2024, I visited the Los Angeles County Sheriff's  
24 Department's Permitium webpage, located at <https://lasd.permitium.com/entry>.  
25 Permitium is a software service used by the Los Angeles County Sheriff's  
26 Department to process CCW permit applications. A true and correct copy of that  
27 webpage, as it appeared when I retrieved it online, is attached as Exhibit G to  
28 Plaintiffs' Request for Judicial Notice.

1           10. On January 23, 2024, I visited the Glendora Police Department's  
2 Permitium webpage, located at <https://glendorapdca.permitium.com/ccw/start>.  
3 Permitium is a software service used by the Glendora Police Department to process  
4 CCW permit applications. A true and correct copy of that webpage, as it appeared  
5 when I retrieved it online, is attached as Exhibit H to Plaintiffs' Request for Judicial  
6 Notice.

7           11. On January 23, 2024, I visited the La Verne Police Department's CCW  
8 webpage, located at <https://www.lvpd.org/#Home/> From there, I retrieved  
9 information distributed by LVPD about the required psychological assessment,  
10 available online directly in PDF form at [https://www.lvpd.org/uploads/  
11 Psychological%20Assesment.pdf](https://www.lvpd.org/uploads/Psychological%20Assesment.pdf). A true and correct copy of that PDF, as it  
12 appeared when I retrieved it online, is attached as Exhibit I to Plaintiffs' Request  
13 for Judicial Notice.

14           12. On January 24, 2024, I visited Duke University's Center for Firearms  
15 Law website, which contains a repository of historical gun laws. There, I retrieved a  
16 copy of: Fred L. Button, ed., General Municipal Ordinances of the City of Oakland,  
17 California (Oakland, CA; Enquirer, 1895), p. 218, Sec. 1, An Ordinance to Prohibit  
18 the Carrying of Concealed Weapons, No. 1141. The webpage for that ordinance in  
19 Duke's repository can be found at: [https://firearmslaw.duke.edu/laws/fred-l-button-  
20 ed-general-municipal-ordinances-of-the-city-of-oakland-california-oakland-ca-  
21 enquirer-1895-p-218-sec-1-an-ordinance-to-prohibit-the-carrying-of-concealed-  
22 weapons-no-1141](https://firearmslaw.duke.edu/laws/fred-l-button-ed-general-municipal-ordinances-of-the-city-of-oakland-california-oakland-ca-enquirer-1895-p-218-sec-1-an-ordinance-to-prohibit-the-carrying-of-concealed-weapons-no-1141). A true and correct copy of the ordinance is attached as Exhibit J  
23 to Plaintiffs' Request for Judicial Notice.

24           13. On January 24, 2024, I visited Duke University's Center for Firearms  
25 Law website, which contains a repository of historical gun laws. There, I retrieved a  
26 copy of: Prohibiting the Carrying of Concealed Deadly Weapons, Ordinance no. 84,  
27 Charter and Ordinances of the City of Sacramento (1876). The webpage for that  
28 ordinance in Duke's repository can be found at: <https://firearmslaw.duke.edu/>

1 [laws/prohibiting-the-carrying-of-concealed-deadly-weapons-ordinance-no-84-](#)  
2 [charter-and-ordinances-of-the-city-of-sacramento-1876](#). A true and correct copy of  
3 the ordinance is attached as Exhibit K to Plaintiffs' Request for Judicial Notice.

4 I declare under penalty of perjury of the laws of the State of California and  
5 the United States that the foregoing is true and correct. Executed within the United  
6 States on January 26, 2024.

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*/s/Konstadinos T. Moros*  
Konstadinos T. Moros, 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 KONSTADINOS T. MOROS 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*

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

Executed January 26, 2024

  
Christina Castron