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7	LA VERNE POLICE DÉPARTMENT, LA CHIEF OF POLICE COLLEEN FLORES	VERNE
8		
9	UNITED STATES D	ISTRICT COURT
10	CENTRAL DISTRICT	OF CALIFORNIA
11		
12	CALIFORNIA RIFLE & PISTOL ASSOCIATION, INCORPORATED; THE	Case No. 2:23-cv-10169-SPG-ADS
13	SECOND AMENDMENT FOUNDATION; GUN OWNERS OF	Honorable Sherilyn Peace Garnett Magistrate Judge Autumn D. Spaeth
14	AMERICA, INC.; GUN OWNERS FOUNDATION; GUN OWNERS OF	DEFENDANTS LA VERNE
15	CALIFORNIA INC.; ERICK VELASQUEZ, an individual; CHARLES	POLICE DEPARTMENT AND LA VERNE CHIEF OF POLICE
16	MESSEL, an individual; BRIAN WEIMER, an individual; CLARENCE	COLLEEN FLORES' SUPPLEMENTAL OBJECTIONS
17 18	RIGALI, an individual; KEITH REEVES, an individual; CYNTHIA GABALDON,	TO EVIDENCE SUBMITTED IN SUPPORT OF PLAINTIFFS'
18 19	an individual; and STEPHEN HOOVER, an individual,	MOTION FOR PRELIMINARY INJUNCTION
20	Plaintiffs,	Hearing Date: March 13, 2024 Hearing Time: 1:30 p.m.
21	V.	Courtroom: 5C
22	LOS ANGELES COUNTY SHERIFF'S DEPARTMENT; SHERIFF ROBERT	
23	LUNA in his official capacity; LA VERNE POLICE DEPARTMENT; LA VERNE	
24	CHIEF OF POLICE COLLEEN FLORES, in her official capacity; ROBERT BONTE,	
25	in his official capacity as Attorney General of the State of California; and DOES 1-10,	
26	Defendants.	
27		
28		

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:
 Defendants LA VERNE POLICE DEPARTMENT ("City") and LA VERNE
 CHIEF OF POLICE COLLEEN FLORES hereby submit the following supplemental
 objections to the following evidence submitted in support of Plaintiffs' Motion for
 Preliminary Injunction, on the grounds set forth below:

• Cumberland County, Pennsylvania License to Carry Firearms Webpage, attached as Exhibit A to Plaintiffs' Request for Judicial Notice ("RJN") in Support of Plaintiffs' Motion for Preliminary Injunction;

9 Arizona Department of Public Safety Concealed Weapons and Permits
10 Webpage, attached as Exhibit C to Plaintiffs' RJN in Support of Plaintiffs' Motion for
11 Preliminary Injunction;

Texas Department of Public Safety, License to Carry (LTC) Fee Table,
attached as Exhibit D to Plaintiffs' RJN in Support of Plaintiffs' Motion for Preliminary
Injunction;

Utah Department of Public Safety – "How do I apply for a Concealed
Firearm Permit?" Webpage, attached as Exhibit E to Plaintiffs' RJN in Support of
Plaintiffs' Motion for Preliminary Injunction;

Washington Department of Licensing – Fees, Firearm Dealers Webpage,
attached as Exhibit F to Plaintiffs' RJN in Support of Plaintiffs' Motion for Preliminary
Injunction;

Los Angeles County Sheriff's Department Concealed Carry Weapon
License, Permitium, attached as Exhibit G to Plaintiffs' RJN in Support of Plaintiffs'
Motion for Preliminary Injunction;

Glendora Police Department License to Carry a Concealed Weapon,
Permitium, attached as Exhibit H to Plaintiffs' RJN in Support of Plaintiffs' Motion for
Preliminary Injunction;

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

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Carrying of Concealed Weapons, No. 1141, attached as Exhibit J to Plaintiffs' RJN in
 Support of Plaintiffs' Motion for Preliminary Injunction;

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• Prohibiting the Carrying of Concealed Deadly Weapons, Ordinance no. 84, Charter and Ordinances of the City of Sacramento (1876), attached as Exhibit K to Plaintiffs' RJN in Support of Plaintiffs' Motion for Preliminary Injunction;

Florida Department of Agriculture and Consumer Services Acceptable
 Firearms Training Documentation Webpage, attached as Exhibit L to Plaintiffs'
 Supplemental Request for Judicial Notice in Support of Plaintiffs' Motion for
 Preliminary Injunction;

Florida Department of Agriculture and Consumer Services Eligibility
Requirements for a Florida Concealed Weapon License Webpage, attached as Exhibit
M to Plaintiffs' Supplemental Request for Judicial Notice in Support of Plaintiffs'
Motion for Preliminary Injunction;

- Riverside County Sheriff's Department Concealed Carry License
 Webpage, Permitium, attached as Exhibit N to Plaintiffs' Supplemental Request for
 Judicial Notice in Support of Plaintiffs' Motion for Preliminary Injunction; and
- San Bernardino County Sheriff's Department Concealed Carry License
 Webpage, Permitium, attached as Exhibit O to Plaintiffs' Supplemental Request for
 Judicial Notice in Support of Plaintiffs' Motion for Preliminary Injunction.

• •			
20	Material objected to:	Objections :	Ruling on
21			Objection
22	29. Cumberland	• Not relevant (FRE 401): Another	□ Sustained
23	County, Pennsylvania	jurisdiction's concealed carry weapon	□ Overruled
24	License to Carry	("CCW") permit requirements are irrelevant	
25	Firearms Webpage,	to the determination of the reasonableness	
26	attached as Exhibit A to	of the City's CCW permitting process.	
27	Plaintiffs' Request for	• <u>Hearsay (FRE 801, 802)</u> : The summary	
28	Judicial Notice in	of the contents of the psychological	



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1 2	Material objected to:	Objections :	<u>Ruling on</u> Objection
3	Support of Plaintiffs'	examination constitutes inadmissible	
4	Motion for Preliminary	hearsay.	
5	Injunction ("Plaintiffs'	• Probative value outweighed by	
6	RJN")	prejudicial effect (FRE 403): The probative	
7		value of the proffered evidence is	
8		substantially outweighed by a danger of	
9		unfair prejudice and confusing the issues.	
0	30. Arizona	• Not relevant (FRE 401): Another	□ Sustained
1	Department of Public	jurisdiction's concealed carry weapon	□ Overruled
2	Safety Concealed	("CCW") permit requirements are irrelevant	
3	Weapons and Permits	to the determination of the reasonableness	
4	Webpage, attached as	of the City's CCW permitting process.	
5	Exhibit C to Plaintiffs'	• Hearsay (FRE 801, 802): The summary	
6	RJN.	of the contents of the psychological	
7		examination constitutes inadmissible	
8		hearsay.	
9		• Probative value outweighed by	
0		prejudicial effect (FRE 403): The probative	
1		value of the proffered evidence is	
2		substantially outweighed by a danger of	
3		unfair prejudice and confusing the issues.	
4	31. Texas Department	• Not relevant (FRE 401): Another	□ Sustained
5	of Public Safety,	jurisdiction's concealed carry weapon	□ Overruled
6	License to Carry (LTC)	("CCW") permit requirements are irrelevant	
7	Fee Table, attached as	to the determination of the reasonableness	
8	Exhibit D to Plaintiffs'	of the City's CCW permitting process.	



Material objected to:	Objections :	Ruling on Objection
RJN.	California law explicitly allows issuing	
	authorities to charge reasonable fees	
	associated with processing CCW	
	applications and allow issuing authorities to	
	require that an applicant pass a	
	psychological test before issuing a CCW	
	permit. See Cal. Pen. Code §§ 26190(c), (e).	
	• Hearsay (FRE 801, 802): The summary	
	of the contents of the psychological	
	examination constitutes inadmissible	
	hearsay.	
	• Probative value outweighed by	
	prejudicial effect (FRE 403): The probative	
	value of the proffered evidence is	
	substantially outweighed by a danger of	
	unfair prejudice and confusing the issues.	
32. Utah Department of	• Not relevant (FRE 401): Another	🗆 Sustaine
Public Safety – "How	jurisdiction's concealed carry weapon	🗆 Overrule
do I apply for a	("CCW") permit requirements are irrelevant	
Concealed Firearm	to the determination of the reasonableness	
Permit?" Webpage,	of the City's CCW permitting process.	
attached as Exhibit E to	• Hearsay (FRE 801, 802): The summary	
Plaintiffs' RJN.	of the contents of the psychological	
	examination constitutes inadmissible	
	hearsay.	
	• Probative value outweighed by	



Material objected	to: Objections:	<u>Ruling on</u> Objection
	prejudicial effect (FRE 403): The probative	
	value of the proffered evidence is	
	substantially outweighed by a danger of	
,	unfair prejudice and confusing the issues.	
33. Washington	• Not relevant (FRE 401): Another	□ Sustained
Department of	jurisdiction's concealed carry weapon	
Licensing – Fees,	("CCW") permit requirements are irrelevant	
Firearm Dealers	to the determination of the reasonableness	
Webpage, attached	as of the City's CCW permitting process.	
Exhibit F to Plainti	ffs' California law explicitly allows issuing	
RJN.	authorities to charge reasonable fees	
	associated with processing CCW	
	applications and allow issuing authorities to	
	require that an applicant pass a	
,	psychological test before issuing a CCW	
	permit. See Cal. Pen. Code §§ 26190(c), (e).	
,	• Hearsay (FRE 801, 802): The summary	
,	of the contents of the psychological	
	examination constitutes inadmissible	
	hearsay.	
	• Probative value outweighed by	
	prejudicial effect (FRE 403): The probative	
	value of the proffered evidence is	
	substantially outweighed by a danger of	
,	unfair prejudice and confusing the issues.	
34. Los Angeles	• Not relevant (FRE 401): Another	□ Sustained



Material objected to:	Objections:	<u>Ruling on</u> Objection
County Sheriff's	jurisdiction's concealed carry weapon	
Department Concealed	("CCW") permit requirements are irrelevant	
Carry Weapon License,	to the determination of the reasonableness	
Permitium, attached as	of the City's CCW permitting process.	
Exhibit G to Plaintiffs'	• Hearsay (FRE 801, 802): The summary	
RJN.	of the contents of the psychological	
	examination constitutes inadmissible	
	hearsay.	
	• Probative value outweighed by	
	prejudicial effect (FRE 403): The probative	
	value of the proffered evidence is	
	substantially outweighed by a danger of	
	unfair prejudice and confusing the issues.	
35. Glendora Police	• Not relevant (FRE 401): Another	🗆 Sustainee
Department License to	jurisdiction's concealed carry weapon	🗆 Overrule
Carry a Concealed	("CCW") permit requirements are irrelevant	
Weapon, Permitium,	to the determination of the reasonableness	
attached as Exhibit H to	of the City's CCW permitting process.	
Plaintiffs' RJN.	• Hearsay (FRE 801, 802): The summary	
	of the contents of the psychological	
	examination constitutes inadmissible	
	hearsay.	
	• Probative value outweighed by	
	prejudicial effect (FRE 403): The probative	
	value of the proffered evidence is	
	substantially outweighed by a danger of	



Material objected to:	Objections :	<u>Ruling on</u> Objection
	unfair prejudice and confusing the issues.	
36. Fred L. Button, ed	• Not relevant (FRE 401): Another	□ Sustained
General Municipal	jurisdiction's concealed carry weapon	
Ordinances of the City	("CCW") permit requirements are irrelevant	
of Oakland, California	to the determination of the reasonableness	
(Oakland, CA;	of the City's CCW permitting process.	
Enquirer, 1895), p. 218	• <u>Hearsay (FRE 801, 802)</u> : The summary	
Sec. 1, An Ordinance t	o of the contents of the psychological	
Prohibit the Carrying o	f examination constitutes inadmissible	
Concealed Weapons,	hearsay.	
No. 1141, attached as	• <u>Probative value outweighed by</u>	
Exhibit J to Plaintiffs'	prejudicial effect (FRE 403): The probative	
RJN.	value of the proffered evidence is	
	substantially outweighed by a danger of	
	unfair prejudice and confusing the issues.	
37. Prohibiting the	• Not relevant (FRE 401): Another	🗆 Sustained
Carrying of Concealed	jurisdiction's concealed carry weapon	
Deadly Weapons,	("CCW") permit requirements are irrelevant	
Ordinance no. 84,	to the determination of the reasonableness	
Charter and Ordinance	s of the City's CCW permitting process.	
of the City of	• <u>Hearsay (FRE 801, 802)</u> : The summary	
Sacramento (1876),	of the contents of the psychological	
attached as Exhibit K t	examination constitutes inadmissible	
Plaintiffs' RJN.	hearsay.	
	• <u>Probative value outweighed by</u>	
	prejudicial effect (FRE 403): The probative	



Material objected to:	Objections :	<u>Ruling on</u> Objection
	value of the proffered evidence is	
	substantially outweighed by a danger of	
	unfair prejudice and confusing the issues.	
38. Florida Department	• Not relevant (FRE 401): Another	🗆 Sustaine
of Agriculture and	jurisdiction's concealed carry weapon	🗆 Overrule
Consumer Services	("CCW") permit requirements are irrelevant	
Acceptable Firearms	to the determination of the reasonableness	
Training	of the City's CCW permitting process.	
Documentation	• Hearsay (FRE 801, 802): The summary	
Webpage, attached as	of the contents of the psychological	
Exhibit L to Plaintiffs'	examination constitutes inadmissible	
Supplemental Request	hearsay.	
for Judicial Notice in	• Probative value outweighed by	
Support of Plaintiffs'	prejudicial effect (FRE 403): The probative	
Motion for Preliminary	value of the proffered evidence is	
Injunction ("Plaintiffs'	substantially outweighed by a danger of	
Supplemental RJN").	unfair prejudice and confusing the issues.	
39. Florida Department	• Not relevant (FRE 401): Another	🗆 Sustaine
of Agriculture and	jurisdiction's concealed carry weapon	🗆 Overrule
Consumer Services	("CCW") permit requirements are irrelevant	
Eligibility	to the determination of the reasonableness	
Requirements for a	of the City's CCW permitting process.	
Florida Concealed	• Hearsay (FRE 801, 802): The summary	
Weapon License	of the contents of the psychological	
Webpage, attached as	examination constitutes inadmissible	
Exhibit M to Plaintiffs'	hearsay.	



1 2	<u>Material objected to</u> :	Objections:	<u>Ruling on</u> Objection
3	Supplemental RJN.	• Probative value outweighed by	
4		prejudicial effect (FRE 403): The probative	
5		value of the proffered evidence is	
6		substantially outweighed by a danger of	
7		unfair prejudice and confusing the issues.	
8	40. Riverside County	• Not relevant (FRE 401): Another	□ Sustained
9	Sheriff's Department	jurisdiction's concealed carry weapon	□ Overruled
10	Concealed Carry	("CCW") permit requirements are irrelevant	
11	License Webpage,	to the determination of the reasonableness	
12	Permitium, attached as	of the City's CCW permitting process.	
13	Exhibit N to Plaintiffs'	• Hearsay (FRE 801, 802): The summary	
14	Supplemental RJN.	of the contents of the psychological	
15		examination constitutes inadmissible	
16		hearsay.	
17		• Probative value outweighed by	
18		prejudicial effect (FRE 403): The probative	
19		value of the proffered evidence is	
20		substantially outweighed by a danger of	
21		unfair prejudice and confusing the issues.	
22	41. San Bernardino	• Not relevant (FRE 401): Another	□ Sustained
23	County Sheriff's	jurisdiction's concealed carry weapon	□ Overruled
24	Department Concealed	("CCW") permit requirements are irrelevant	
25	Carry License	to the determination of the reasonableness	
26	Webpage, Permitium,	of the City's CCW permitting process.	
27	attached as Exhibit O to	• <u>Hearsay (FRE 801, 802)</u> : The summary	
28	Plaintiffs' Supplemental	of the contents of the psychological	



1 Material objected to	<u>o:</u> <u>Objections</u> :	Ruling on Objection
3 RJN.	examination constitutes inadmissible	
4	hearsay.	
5	• <u>Probative value outweighed by</u>	
6	prejudicial effect (FRE 403): The probative	
7	value of the proffered evidence is	
	substantially outweighed by a danger of	
	unfair prejudice and confusing the issues.	
Dated: March 4, 2024	4 JONES MAYER	
	By: /s/Bruce A. Lindsay Bruce A. Lindsay Monica Choi Arredondo Attorneys for Defendants, LA VERNE POLICE DEPAF VERNE CHIEF OF POLICE FLORES	RTMENT, L COLLEEN
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