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7 CHIEF OF POLICE COLLEEN FLORES

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10
11 CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED; THE
12 SECOND AMENDMENT FOUNDATION;
GUN OWNERS OF AMERICA, INC.;
13 GUN OWNERS FOUNDATION; GUN
OWNERS OF CALIFORNIA INC.; ERICK
14 VELASQUEZ, an individual; CHARLES
MESSEL, an individual; BRIAN WEIMER,
15 an individual; CLARENCE RIGALI, an
individual; KEITH REEVES, an individual;
16 CYNTHIA GABALDON, an individual; and
STEPHEN HOOVER, an individual,

17 Plaintiffs,

18 v.

19 LOS ANGELES COUNTY SHERIFF'S
20 DEPARTMENT; SHERIFF ROBERT
LUNA in his official capacity; LA VERNE
21 POLICE DEPARTMENT; LA VERNE
CHIEF OF POLICE COLLEEN FLORES,
22 in her official capacity; ROBERT BONTE,
in his official capacity as Attorney General
23 of the State of California; and DOES 1-10,

24 Defendants.

Case No. 2:23-cv-10169-SPG-ADS

*Honorable Sherilyn Peace Garnett
Magistrate Judge Autumn D. Spaeth*

**NOTICE RE SUPPLEMENTAL
DECLARATION OF LT. CHRIS
DRANSFELDT IN SUPPORT OF
DEFENDANTS CITY OF LA
VERNE AND LA VERNE CHIEF
OF POLICE COLLEEN FLORES'
OPPOSITION TO PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

NOTICE

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants City of La Verne and Chief Colleen Flores (“La Verne Defendants”)

respectfully submit this Notice regarding the Supplemental Declaration of Lt. Chris Dransfeldt filed in support of La Verne Defendants’ Opposition to Plaintiffs’ Motion for Preliminary Injunction, on May 24, 2024 [ECF No. 48-1].

Said Supplemental Declaration is highly relevant on the issue of the CCW fees associated with the issuance of CCW licenses/permits by the La Verne Police Department as it contains updated data on the current fees charged throughout Los Angeles County by 46 jurisdictions. Given the “as applied” challenge directed by Plaintiffs at the CCW process and fees associated with the La Verne Defendants’ CCW licensing/permitting process, the data shows that the average CCW fee in Los Angeles County is \$784.70 compared to the fees of \$786.00 associated with the La Verne Defendants’ CCW process.

Dated: May 24, 2024

JONES MAYER

By: /s/Bruce A. Lindsay

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