

1 ROB BONTA
Attorney General of California
2 MARK R. BECKINGTON
Supervising Deputy Attorney General
3 CHRISTINA R.B. LÓPEZ
Deputy Attorney General
4 State Bar No. 312610
300 South Spring Street, Suite 1702
5 Los Angeles, CA 90013-1230
Telephone: (213) 269-6106
6 Fax: (916) 324-8835
E-mail: Christina.Lopez@doj.ca.gov
7 *Attorneys for Defendant Rob Bonta*

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

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

18 Plaintiffs,

19 v.

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

25 Defendants.
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2:23-cv-10169

**DEFENDANT ROB BONTA'S ANSWER
TO FIRST AMENDED AND
SUPPLEMENTAL COMPLAINT**

Judge: The Honorable Sherilyn
Peace Garnett

Action Filed: December 5, 2023

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ANSWER

Pursuant to Federal Rules of Civil Procedure 7, 8, and 12, Defendant Rob Bonta, in his official capacity as Attorney General of the State of California, answers Plaintiffs’ First Amended and Supplemental Complaint (ECF No. 55) as follows:

INTRODUCTION¹

1. The Attorney General admits that the quoted language in Paragraph 1 appears in the Second Amendment to the United States Constitution and that the Constitution and authority cited in Paragraph 1 speak for themselves. The remaining allegations in Paragraph 1 are legal arguments and/or conclusions to which no response is required. To the extent any allegations in Paragraph 1 may be deemed factual, the Attorney General denies them.

2. The allegations in the first sentence of Paragraph 2 are characterizations of Plaintiffs’ claims to which no response is required. The allegations in the second sentence of Paragraph 2 are legal arguments and/or conclusions to which no response is required. To the extent any allegations in Paragraph 2 may be deemed factual, the Attorney General denies them.

3. The Attorney General admits that the authorities cited in footnote 1 speak for themselves. The remaining allegations in Paragraph 3 and footnote 1 are legal arguments and/or conclusions to which no response is required. To the extent any allegations in Paragraph 3 and/or footnote 1 may be deemed factual, the Attorney General denies them.

4. The Attorney General admits that the quoted language in Paragraph 4 appears in *New York State Rifle & Pistol Association v. Bruen*, 597 U.S. 1 (2022) and that *Bruen* speaks for itself. The Attorney General lacks sufficient information to form a belief as to the truth of the motivation of the Supreme Court or purpose of the quoted language and on that basis denies the remaining allegations in Paragraph 4.

5. The Attorney General denies the allegations in Paragraph 5.

¹ For the convenience of the Court and the parties, this Answer imports the primary headings utilized by Plaintiffs in the First Amended and Supplemental Complaint. To the extent that any response is required to the substance of the headings, the Attorney General denies all allegations contained in or suggested by the headings.

1 6. The allegations in Paragraph 6 are characterizations of Plaintiffs' claims to which no
2 response is required. To the extent any allegations in Paragraph 6 may be deemed factual, the
3 Attorney General denies them.

4 7. The Attorney General lacks sufficient information to form a belief as to the truth of
5 the allegations in Paragraph 7 and on that basis denies them.

6 8. The allegations in the first sentence of Paragraph 8 are legal argument and/or
7 conclusions to which no response is required. To the extent any allegations in the first sentence
8 of Paragraph 8 may be deemed factual, the Attorney General lacks sufficient information to form
9 a belief as to their truth and on that basis denies them. The Attorney General lacks sufficient
10 information to form a belief as to the truth of the remaining allegations in Paragraph 8 and on that
11 basis denies them.

12 9. The Attorney General lacks sufficient information to form a belief as to the truth of
13 the allegations in Paragraph 9 and on that basis denies them.

14 10. The allegations in Paragraph 10 are legal arguments and/or conclusions to which no
15 response is required. To the extent any allegations in Paragraph 10 may be deemed factual, the
16 Attorney General lacks sufficient information to form a belief as to their truth and on that basis
17 denies them.

18 11. The Attorney General admits that *Bruen* speaks for itself. The remaining allegations
19 in Paragraph 11 are legal arguments and/or conclusions to which no response is required. To the
20 extent any allegations in Paragraph 11 may be deemed factual, the Attorney General lacks
21 sufficient information to form a belief as to their truth and on that basis denies them.

22 12. The Attorney General admits that Senate Bill 2 and the prior law referenced in
23 Paragraph 12 speak for themselves. The Attorney General denies the remaining allegations, if
24 any, in Paragraph 12.

25 13. The allegations in Paragraph 13 are legal argument and/or conclusions to which no
26 response is required. To the extent any allegations in Paragraph 13 may be deemed factual, the
27 Attorney General lacks sufficient information to form a belief as to their truth and on that basis
28 denies them.

1 14. The Attorney General admits that California does not honor carry permits from any
2 state other than California. The Attorney General lacks sufficient information to form a belief as
3 to the truth of the remaining allegations in Paragraph 14 and on that basis denies them.

4 15. The Attorney General admits that the process for obtaining a permit to carry
5 firearms in California is set forth by statute and regulation and that those authorities speak for
6 themselves.

7 16. The Attorney General admits that the authorities cited in Paragraph 16 speak for
8 themselves. The Attorney General otherwise denies the allegations in Paragraph 16.

9 17. The Attorney General admits that the authorities cited in Paragraph 17 speak for
10 themselves. The remaining allegations in Paragraph 17 are legal arguments and/or conclusions to
11 which no response is required. To the extent any allegations in Paragraph 17 may be deemed
12 factual, the Attorney General denies them. The Attorney General denies any constitutional
13 violation.

14 18. The Attorney General admits that the quoted language in Paragraph 18 appears in
15 the Article IV, § 2 of the United States Constitution, and that the Constitution and authority cited
16 in Paragraph 18 speak for themselves. The Attorney General denies the remaining allegations, if
17 any, in Paragraph 18.

18 19. The allegations in Paragraph 19 are characterizations of Plaintiffs' claims to which
19 no response is required. To the extent any allegations in Paragraph 19 may be deemed factual,
20 the Attorney General denies them. The Attorney General denies any constitutional violation.

21 **PARTIES**

22 20. The Attorney General lacks sufficient information to form a belief as to the truth of
23 the allegations in Paragraph 20 and on that basis denies them.

24 21. The Attorney General lacks sufficient information to form a belief as to the truth of
25 the allegations in Paragraph 21 and on that basis denies them.

26 22. The Attorney General lacks sufficient information to form a belief as to the truth of
27 the allegations in the first sentence of Paragraph 22 and on that basis denies them. The remaining
28 allegations in Paragraph 22 are characterizations of Plaintiffs' claims to which no response is

1 required. To the extent any of the remaining allegations in Paragraph 22 may be deemed factual,
2 the Attorney General denies them.

3 23. The Attorney General lacks sufficient information to form a belief as to the truth of
4 the allegations in Paragraph 23 and on that basis denies them.

5 24. The Attorney General lacks sufficient information to form a belief as to the truth of
6 the allegations in Paragraph 24 and on that basis denies them.

7 25. The Attorney General lacks sufficient information to form a belief as to the truth of
8 the allegations in Paragraph 25 and on that basis denies them.

9 26. The Attorney General lacks sufficient information to form a belief as to the truth of
10 the allegations in Paragraph 26 and on that basis denies them.

11 27. The Attorney General lacks sufficient information to form a belief as to the truth of
12 the allegations in Paragraph 27 and on that basis denies them.

13 28. The Attorney General lacks sufficient information to form a belief as to the truth of
14 the allegations in Paragraph 28 and on that basis denies them.

15 29. The Attorney General lacks sufficient information to form a belief as to the truth of
16 the allegations in Paragraph 29 and on that basis denies them.

17 30. The allegations in Paragraph 30 are characterizations of Plaintiffs' claims to which
18 no response is required. To the extent any allegations in Paragraph 30 may be deemed factual,
19 the Attorney General lacks sufficient information to form a belief as to their truth and on that
20 basis denies them.

21 31. The Attorney General lacks sufficient information to form a belief as to the truth of
22 the allegations in Paragraph 31 and on that basis denies them.

23 32. The Attorney General lacks sufficient information to form a belief as to the truth of
24 the allegations in Paragraph 32 and on that basis denies them.

25 33. The Attorney General lacks sufficient information to form a belief as to the truth of
26 the allegations in Paragraph 33 and on that basis denies them.

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1 34. The Attorney General admits that the statute cited in Paragraph 34 speaks for itself.
2 The Attorney General lacks sufficient information to form a belief as to the truth of the remaining
3 allegations in Paragraph 34 and on that basis denies them.

4 35. The allegations in Paragraph 35 are characterizations of Plaintiffs' claims to which
5 no response is required. To the extent any allegations in Paragraph 35 may be deemed factual,
6 the Attorney General lacks sufficient information to form a belief as to their truth and on that
7 basis denies them.

8 36. The allegations in Paragraph 36 are characterizations of Plaintiffs' claims to which
9 no response is required. To the extent any allegations in Paragraph 36 may be deemed factual,
10 the Attorney General lacks sufficient information to form a belief as to their truth and on that
11 basis denies them.

12 37. The Attorney General lacks sufficient information to form a belief as to the truth of
13 the allegations in Paragraph 37 and on that basis denies them.

14 38. The Attorney General lacks sufficient information to form a belief as to the truth of
15 the allegations in Paragraph 38 and on that basis denies them.

16 39. The Attorney General lacks sufficient information to form a belief as to the truth of
17 the allegations in Paragraph 39 and on that basis denies them.

18 40. The Attorney General lacks sufficient information to form a belief as to the truth of
19 the allegations in Paragraph 40 and on that basis denies them.

20 41. The Attorney General lacks sufficient information to form a belief as to the truth of
21 the allegations in the first two sentences of Paragraph 41 and on that basis denies them. The
22 allegations in last sentence of Paragraph 41 are legal arguments and/or conclusions to which no
23 response is required. To the extent the allegations in the last sentence of Paragraph 41 may be
24 deemed factual, the Attorney General denies them.

25 42. The Attorney General lacks sufficient information to form a belief as to the truth of
26 the allegations in Paragraph 42 and on that basis denies them.

27 43. The Attorney General lacks sufficient information to form a belief as to the truth of
28 the allegations in Paragraph 43 and on that basis denies them.

1 44. The Attorney General lacks sufficient information to form a belief as to the truth of
2 the allegations in Paragraph 44 and on that basis denies them.

3 45. The Attorney General lacks sufficient information to form a belief as to the truth of
4 the allegations in the first two sentences of Paragraph 45 and on that basis denies them. The
5 allegations in last sentence of Paragraph 45 are legal arguments and/or conclusions to which no
6 response is required. To the extent the allegations in the last sentence of Paragraph 45 may be
7 deemed factual, the Attorney General denies them.

8 46. The Attorney General denies that the option to require a psychological exam as part
9 of the process for obtaining a carry permit is unconstitutional. The Attorney General lacks
10 sufficient information to form a belief as to the truth of the remaining allegations in Paragraph 46
11 and on that basis denies them.

12 47. The Attorney General lacks sufficient information to form a belief as to the truth of
13 the allegations in Paragraph 47 and on that basis denies them.

14 48. The Attorney General admits that *Bruen* speaks for itself. The Attorney General
15 lacks sufficient information to form a belief as to the truth of the remaining allegations in
16 Paragraph 48 and on that basis denies them.

17 49. The Attorney General denies that the option to require a psychological exam as part
18 of the process for obtaining a carry permit is unconstitutional. The Attorney General lacks
19 sufficient information to form a belief as to the truth of the remaining allegations in Paragraph 49
20 and on that basis denies them.

21 50. The Attorney General lacks sufficient information to form a belief as to the truth of
22 the allegations in Paragraph 50 and on that basis denies them.

23 51. The allegations in the second sentence of Paragraph 51 are legal arguments and/or
24 conclusions to which no response is required. To the extent the allegations in the second sentence
25 of Paragraph 51 may be deemed factual, the Attorney General denies them. The Attorney
26 General lacks sufficient information to form a belief as to the truth of the remaining allegations in
27 Paragraph 51 and on that basis denies them.

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1 52. The Attorney General lacks sufficient information to form a belief as to the truth of
2 the allegations in Paragraph 52 and on that basis denies them.

3 53. The Attorney General admits that California does not honor carry permits from
4 Nevada and that the process for obtaining a permit to carry firearms in California is set forth by
5 statute and regulation, which authorities speak for themselves. The Attorney General lacks
6 sufficient information to form a belief as to the truth of the remaining allegations in Paragraph 53
7 and on that basis denies them.

8 54. The allegations in the last sentence of Paragraph 54 are characterizations of
9 Plaintiffs' claims to which no response is required. To the extent any allegations in the last
10 sentence of Paragraph 54 may be deemed factual, the Attorney General lacks sufficient
11 information to form a belief as to their truth and on that basis denies them. The Attorney General
12 lacks sufficient information to form a belief as to the truth of the remaining allegations in
13 Paragraph 54 and on that basis denies them.

14 55. The allegations in Paragraph 55 are characterizations of Plaintiffs' claims to which
15 no response is required. To the extent any allegations in Paragraph 55 may be deemed factual,
16 the Attorney General lacks sufficient information to form a belief as to their truth and on that
17 basis denies them.

18 56. The Attorney General lacks sufficient information to form a belief as to the truth of
19 the allegations in Paragraph 56 and on that basis denies them.

20 57. The Attorney General lacks sufficient information to form a belief as to the truth of
21 the allegations in Paragraph 57 and on that basis denies them.

22 58. The Attorney General admits that California does not honor carry permits from
23 Florida and that the process for obtaining a permit to carry firearms in California is set forth by
24 statute and regulation, which authorities speak for themselves. The Attorney General lacks
25 sufficient information to form a belief as to the truth of the remaining allegations in Paragraph 58
26 and on that basis denies them.

27 59. The allegations in Paragraph 59 are characterizations of Plaintiffs' claims to which
28 no response is required. To the extent any allegations in Paragraph 59 may be deemed factual,

1 the Attorney General lacks sufficient information to form a belief as to their truth and on that
2 basis denies them.

3 60. The Attorney General admits that the statutes cited in Paragraph 60 speak for
4 themselves. The Attorney General lacks sufficient information to form a belief as to the truth of
5 the remaining allegations in Paragraph 60 and on that basis denies them.

6 61. The Attorney General denies that the process for obtaining a carry permit in
7 California is unconstitutional. The Attorney General lacks sufficient information to form a belief
8 as to the truth of the remaining allegations in Paragraph 61 and on that basis denies them.

9 62. The Attorney General denies that the process for obtaining a carry permit in
10 California is unconstitutional. The Attorney General lacks sufficient information to form a belief
11 as to the truth of the remaining allegations in Paragraph 62 and on that basis denies them.

12 63. The Attorney General denies that the process for obtaining a carry permit in
13 California is unconstitutional and any implication that the Second Amendment needs to be
14 “restored” in California. The Attorney General lacks sufficient information to form a belief as to
15 the truth of the remaining allegations in Paragraph 63 and on that basis denies them.

16 64. The Attorney General denies that the process for obtaining a carry permit in
17 California is unconstitutional and any implication that other firearm restrictions in California
18 challenged by Plaintiff CRPA are “unlawful.” The Attorney General lacks sufficient information
19 to form a belief as to the truth of the remaining allegations in Paragraph 64 and on that basis
20 denies them.

21 65. The Attorney General admits the allegations in Paragraph 65.

22 66. The Attorney General admits that Defendant Robert Luna is the elected Sheriff of
23 Los Angeles County and that the statute cited in Paragraph 66 speaks for itself. The Attorney
24 General lacks sufficient information to form a belief as to the truth of the remaining allegations in
25 Paragraph 66 and on that basis denies them.

26 67. The Attorney General admits the allegations in Paragraph 67.

27 68. The Attorney General admits that Defendant Colleen Flores was formerly the Chief
28 of Police of the La Verne Police Department, that Defendant Samuel Gonzales succeeded

1 Defendant Colleen Flores as the Chief of Police of the La Verne Police Department, and that the
2 statute cited in Paragraph 68 speaks for itself. The Attorney General lacks sufficient information
3 to form a belief as to the truth of the remaining allegations in Paragraph 68 and on that basis
4 denies them.

5 69. The Attorney General admits that he, Rob Bonta, is the Attorney General of
6 California and that Article V, section 13 of the California Constitution sets for the duties of that
7 office and speaks for itself. The Attorney General denies any allegations in Paragraph 69
8 inconsistent therewith.

9 70. The allegations in the last sentence of Paragraph 70 are characterizations of relief
10 Plaintiffs seek to which no response is required. To the extent any allegations in the last sentence
11 of Paragraph 70 may be deemed factual, the Attorney General denies them. The Attorney
12 General lacks sufficient information to form a belief as to the truth of the remaining allegations in
13 Paragraph 70 and on that basis denies them.

14 **JURISDICTION AND VENUE**

15 71. The Attorney General admits that the statutes cited in Paragraph 71 speak for
16 themselves and that this Court has jurisdiction over Plaintiffs' claims.

17 72. The Attorney General admits that the statutes cited in Paragraph 72 speak for
18 themselves. The remaining allegations in Paragraph 72 are legal arguments and/or conclusions to
19 which no response is required. To the extent any remaining allegations in Paragraph 72 may be
20 deemed factual, the Attorney General denies them.

21 73. The Attorney General admits that the statutes cited in Paragraph 73 speak for
22 themselves and that venue in this juridical district is proper.

23 **GENERAL ALLEGATIONS**

24 74. The Attorney General admits that the quoted language in Paragraph 74 appears in
25 *District of Columbia v. Heller*, 554 U.S. 570 (2008) and that *Heller* speaks for itself. The
26 remaining allegations in Paragraph 74 are legal arguments and/or conclusions to which no
27 response is required. To the extent any allegations in Paragraph 74 may be deemed factual, the
28 Attorney General denies them.

1 75. The Attorney General admits that *McDonald v. City of Chicago*, 561 U.S. 742
2 (2010) speaks for itself. The remaining allegations in Paragraph 75 are legal arguments and/or
3 conclusions to which no response is required. To the extent any allegations in Paragraph 75 may
4 be deemed factual, the Attorney General denies them.

5 76. The Attorney General admits that the quoted language in Paragraph 76 appears in
6 *Heller* and that the cited authorities speak for themselves. The remaining allegations in Paragraph
7 76 are legal arguments and/or conclusions to which no response is required. To the extent any
8 allegations in Paragraph 76 may be deemed factual, the Attorney General denies them.

9 77. The Attorney General admits that the quoted language in Paragraph 77 appears in
10 *Bruen* and that *Bruen* speaks for itself. The remaining allegations in Paragraph 77 are legal
11 arguments and/or conclusions to which no response is required. To the extent any allegations in
12 Paragraph 77 may be deemed factual, the Attorney General denies them.

13 78. The Attorney General admits that the quoted language in Paragraph 78 appears in
14 *Bruen* and that *Bruen* speaks for itself.

15 79. The Attorney General admits that the quoted language in Paragraph 79 appears in
16 *Bruen* and that *Bruen* speaks for itself. The remaining allegations in Paragraph 79 are
17 characterizations of Plaintiffs' claims and legal arguments and/or conclusions to which no
18 response is required. To the extent any allegations in Paragraph 79 may be deemed factual, the
19 Attorney General denies them.

20 80. The Attorney General admits that the quoted language in Paragraph 80 appears in
21 California Penal Code section 26150(a) and that the cited statutes speak for themselves.

22 81. The Attorney General admits that the quoted language in Paragraph 80 appears in
23 California Penal Code section 26205 and that section 26205 and the prior law cited in footnote 2
24 speak for themselves.

25 82. The Attorney General admits that the quoted language in Paragraph 82 appears in
26 California Penal Code section 26190(b)(2) and that section 26190 and the prior law cited in
27 footnote 3 speak for themselves.
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1 83. The Attorney General admits that the quoted language in Paragraph 83 appears in
2 California Penal Code section 26175(g) and that section 26175 and *Bruen* speak for themselves.
3 The Attorney General lacks sufficient information to form a belief as to the truth of the
4 allegations in Paragraph 83 regarding local requirements and on that basis denies them. The
5 remaining allegations in Paragraph 83 are legal arguments and/or conclusions to which no
6 response is required. To the extent any allegations in Paragraph 83 may be deemed factual, the
7 Attorney General denies them.

8 84. The Attorney General admits that local issuing authorities have the option to require
9 a psychological exam as part of the process for obtaining a carry permit. The Attorney General
10 denies that the option to require a psychological exam as part of the process for obtaining a carry
11 permit is unconstitutional.

12 85. The Attorney General admits that *Bruen* speaks for itself. The Attorney General
13 denies that the option to require a psychological exam as part of the process for obtaining a carry
14 permit is unconstitutional. The remaining allegations in Paragraph 85 are legal arguments and/or
15 conclusions to which no response is required. To the extent any of the remaining allegations in
16 Paragraph 85 may be deemed factual, the Attorney General denies them.

17 86. The Attorney General admits that local issuing authorities have the option to require
18 a psychological exam as part of the process for obtaining a carry permit and that the process for
19 obtaining a permit to carry firearms in California is set forth by statute and regulation, which
20 authorities speak for themselves. The Attorney General denies that the option to require a
21 psychological exam as part of the process for obtaining a carry permit is unconstitutional. The
22 remaining allegations in Paragraph 86 are legal arguments and/or conclusions to which no
23 response is required. To the extent any of the remaining allegations in Paragraph 86 may be
24 deemed factual, the Attorney General denies them.

25 87. The Attorney General admits that *Bruen* speaks for itself. The Attorney General
26 denies that the option to require a psychological exam as part of the process for obtaining a carry
27 permit is unconstitutional.

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1 88. The Attorney General admits that the statutes and Senate Bill 2 cited in Paragraph 88
2 speak for themselves. The remaining allegations in Paragraph 88 are legal arguments and/or
3 conclusions to which no response is required. To the extent any allegations in Paragraph 88 may
4 be deemed factual, the Attorney General denies them.

5 89. The allegations in Paragraph 89, including footnote 4, are characterizations of
6 Plaintiffs' claims to which no response is required. To the extent any allegations in Paragraph 89
7 or footnote 4 may be deemed factual, the Attorney General denies them.

8 90. The Attorney General admits that the quoted language in Paragraph 90 appears in
9 California Penal Code section 26202(a)(9) and that section 26202 and Senate Bill 2 speak for
10 themselves. The remaining allegations in Paragraph 90 are legal arguments and/or conclusions to
11 which no response is required. To the extent any of the remaining allegations in Paragraph 90
12 may be deemed factual, the Attorney General denies them.

13 91. The Attorney General admits that the quoted language in Paragraph 91 appears in
14 California Penal Code section 26202(a)(10) and that section 26202 speaks for itself.

15 92. The Attorney General admits that California Penal Code section 26202(a)(3) and
16 Senate Bill 2 speak for themselves. The remaining allegations in Paragraph 92 are legal
17 arguments and/or conclusions to which no response is required. To the extent any of the
18 remaining allegations in Paragraph 92 may be deemed factual, the Attorney General denies them.

19 93. The Attorney General admits that the quoted language in Paragraph 93 appears in
20 California Penal Code section 26202(a)(5) and that section 26202 and Senate Bill 2 speak for
21 themselves. The remaining allegations in Paragraph 93 are legal arguments and/or conclusions to
22 which no response is required. To the extent any of the remaining allegations in Paragraph 93
23 may be deemed factual, the Attorney General denies them.

24 94. The Attorney General denies that any of the criteria set forth in California Penal
25 Code section 26202(a) are unconstitutional. The allegations in the first sentence of Paragraph 94
26 are legal arguments and/or conclusions to which no response is required. The allegations in the
27 last sentence of Paragraph 94 are a characterization of the relief Plaintiffs seek to which no
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1 response is required. To the extent any of the allegations in Paragraph 94 may be deemed factual,
2 the Attorney General denies them.

3 95. The Attorney General denies that California Penal Code sections 26202(a)(3), (5), or
4 (9) are unconstitutional. The allegations in Paragraph 95 are characterizations of Plaintiffs'
5 claims to which no response is required. To the extent any of the allegations in Paragraph 95 may
6 be deemed factual, the Attorney General lacks sufficient information to form a belief as to their
7 truth and on that basis denies them.

8 96. The Attorney General admits that *Bruen* and the letters referred to in Paragraph 96
9 speak for themselves. The Attorney General lacks sufficient information to form a belief as to the
10 truth of the remaining allegations in Paragraph 96 and on that basis denies them.

11 97. The Attorney General admits that the Legal Alert referred to in Paragraph 97 and
12 *Bruen* speak for themselves. The remaining allegations in Paragraph 97 are legal arguments,
13 legal conclusions, and/or characterizations of Plaintiffs' claims to which no response is required.
14 To the extent any of the remaining allegations in Paragraph 97 may be deemed factual, the
15 Attorney General denies them.

16 98. The Attorney General admits that *Bruen* and the letter referred to in Paragraph 98
17 speak for themselves. The remaining allegations in Paragraph 98 and footnote 5 are legal
18 arguments and/or conclusions or characterize Plaintiffs' claims to which no response is required.
19 To the extent any of the remaining allegations in Paragraph 98 and/or footnote 5 may be deemed
20 factual, the Attorney General lacks sufficient information to form a belief as to their truth and on
21 that basis denies them.

22 99. The Attorney General admits that the correspondences and responses referred to in
23 Paragraph 99 speak for themselves. The Attorney General lacks sufficient information to form a
24 belief as to the truth of the remaining allegations in Paragraph 99 and on that basis denies them.

25 100. The Attorney General admits that the statement by Sheriff Alex Villanueva set forth
26 in Paragraph 100 and California Penal Code section 26150 speak for themselves. The remaining
27 allegations in Paragraph 100 are legal arguments and/or conclusions to which no response is
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1 required. To the extent any of the remaining allegations in Paragraph 100 may be deemed
2 factual, the Attorney General denies them.

3 101. The allegations in Paragraph 101 are legal arguments and/or conclusions to which no
4 response is required. To the extent any of the allegations in Paragraph 101 may be deemed
5 factual, the Attorney General denies them.

6 102. The Attorney General admits that *Bruen* speaks for itself. The Attorney General
7 lacks sufficient information to form a belief as to the truth of the remaining allegations in
8 Paragraph 102 and on that basis denies them.

9 103. The Attorney General admits that the letter quoted and discussed in Paragraph 103
10 speaks for itself. The Attorney General lacks sufficient information to form a belief as to the
11 truth of the remaining allegations in Paragraph 103 and on that basis denies them.

12 104. The Attorney General admits that the correspondence and letter referred to and
13 reproduced in Paragraph 104 speak for themselves. The Attorney General lacks sufficient
14 information to form a belief as to the truth of the remaining allegations in Paragraph 104 and on
15 that basis denies them.

16 105. The Attorney General admits that the letter referred to in Paragraph 105 speaks for
17 itself. The Attorney General lacks sufficient information to form a belief as to the truth of the
18 remaining allegations in Paragraph 105 and on that basis denies them.

19 106. The Attorney General admits that the letter quoted in Paragraph 106 speaks for
20 itself. The Attorney General lacks sufficient information to form a belief as to the truth of the
21 remaining allegations in Paragraph 106 and on that basis denies them.

22 107. The Attorney General lacks sufficient information to form a belief as to the truth of
23 the allegations in Paragraph 107 and on that basis denies them.

24 108. The Attorney General admits that the Public Records Act response quoted in
25 Paragraph 108 speaks for itself. The Attorney General lacks sufficient information to form a
26 belief as to the truth of the remaining allegations in Paragraph 108 and on that basis denies them.

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1 109. The Attorney General admits that the correspondence and letter referred to in
2 Paragraph 109 speak for themselves. The Attorney General lacks sufficient information to form a
3 belief as to the truth of the remaining allegations in Paragraph 109 and on that basis denies them.

4 110. The Attorney General admits that the web page quoted and cited in Paragraph 110
5 and footnote 6 speaks for itself. The Attorney General lacks sufficient information to form a
6 belief as to the truth of the remaining allegations in Paragraph 110 and on that basis denies them.

7 111. The Attorney General lacks sufficient information to form a belief as to the truth of
8 the allegations in Paragraph 111 and on that basis denies them.

9 112. The Attorney General lacks sufficient information to form a belief as to the truth of
10 the allegations in Paragraph 112 and on that basis denies them.

11 113. The Attorney General admits that the web pages cited in Paragraph 113 and
12 footnotes 7–13 speak for themselves. The Attorney General lacks sufficient information to form
13 a belief as to the truth of the remaining allegations in Paragraph 113 and on that basis denies
14 them.

15 114. The allegations in the first sentence of Paragraph 114 characterize Plaintiffs claims
16 to which no response is required. To the extent any of the allegations in the first sentence in
17 Paragraph 114 and the remaining allegations in Paragraph 114 may be deemed factual, the
18 Attorney General lacks sufficient information to form a belief as to their truth and on that basis
19 denies them.

20 115. The Attorney General admits that the web pages cited in Paragraph 115 and
21 footnotes 14 and 17–18 speak for themselves. The Attorney General lacks sufficient information
22 to form a belief as to the truth of the remaining allegations in Paragraph 115, including footnotes
23 15–16, and on that basis denies them.

24 116. The Attorney General admits that the web pages cited in Paragraph 116 and
25 footnotes 19–22 speak for themselves. The Attorney General lacks sufficient information to form
26 a belief as to the truth of the remaining allegations in Paragraph 113 and on that basis denies
27 them.

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1 117. The Attorney General admits that *Bruen* speaks for itself and denies any
2 constitutional violation. The Attorney General lacks sufficient information to form a belief as to
3 the truth of the remaining allegations in Paragraph 117 and on that basis denies them.

4 118. The Attorney General admits that *Bruen* speaks for itself and denies any
5 constitutional violation. The Attorney General lacks sufficient information to form a belief as to
6 the truth of the remaining allegations in Paragraph 118 and on that basis denies them.

7 119. The Attorney General admits that the web page cited in Paragraph 119 and footnote
8 23 speaks for itself. The Attorney General lacks sufficient information to form a belief as to the
9 truth of the remaining allegations in Paragraph 119 and on that basis denies them.

10 120. The Attorney General admits that California Penal Code section 26190 speaks for
11 itself and denies any constitutional or statutory violation. The Attorney General lacks sufficient
12 information to form a belief as to the truth of the remaining allegations in Paragraph 120,
13 including subparts a and b and footnote 24, and on that basis denies them.

14 121. The Attorney General denies any constitutional violation. The Attorney General
15 lacks sufficient information to form a belief as to the truth of the remaining allegations in
16 Paragraph 121 and on that basis denies them.

17 122. The Attorney General denies that the option to require a psychological exam as part
18 of the process for obtaining a carry permit is unconstitutional. The Attorney General lacks
19 sufficient information to form a belief as to the truth of the remaining allegations, if any, in
20 Paragraph 122 and on that basis denies them.

21 123. The Attorney General lacks sufficient information to form a belief as to the truth of
22 the allegations in Paragraph 123 and on that basis denies them.

23 124. The Attorney General lacks sufficient information to form a belief as to the truth of
24 the allegations in Paragraph 124 and on that basis denies them.

25 125. The Attorney General denies that the option to require a psychological exam as part
26 of the process for obtaining a carry permit is unconstitutional. The Attorney General lacks
27 sufficient information to form a belief as to the truth of the remaining allegations in Paragraph
28 125 and on that basis denies them.

1 126. The Attorney General denies that the option to require a psychological exam as part
2 of the process for obtaining a carry permit is unconstitutional. The Attorney General lacks
3 sufficient information to form a belief as to the truth of the remaining allegations, if any, in
4 Paragraph 126 and on that basis denies them.

5 127. The Attorney General lacks sufficient information to form a belief as to the truth of
6 the allegations in Paragraph 127 and on that basis denies them.

7 128. The Attorney General admits that California does not honor carry permits from any
8 state other than California. The Attorney General lacks sufficient information to form a belief as
9 to the truth of the remaining allegations in Paragraph 128 and on that basis denies them.

10 129. The Attorney General admits that the process for obtaining a permit to carry
11 firearms in California is set forth by statute and regulation and that those authorities speak for
12 themselves. The remaining allegations in Paragraph 129 are legal arguments and/or conclusions
13 to which no response is required. To the extent any allegations in Paragraph 129 may be deemed
14 factual, the Attorney General denies them.

15 130. The Attorney General admits that California does not honor carry permits from any
16 state other than California and that the process for obtaining a permit to carry firearms in
17 California is set forth by statute and regulation, which authorities speak for themselves.

18 131. The Attorney General admits that the quoted language in Paragraph 131 appears in
19 *Heller* and that *Heller* speaks for itself. The remaining allegations in Paragraph 131 are legal
20 arguments and/or conclusions to which no response is required. To the extent any allegations in
21 Paragraph 131 may be deemed factual, the Attorney General denies them.

22 132. The Attorney General admits that the laws referred to in Paragraph 132 speak for
23 themselves. The Attorney General denies the remaining allegations in Paragraph 132.

24 133. The Attorney General admits that the quoted language in Paragraph 133 appears in
25 *Obergefell v. Hodges*, 576 U.S. 644 (2015) and that *Obergefell* speaks for itself. The remaining
26 allegations in Paragraph 133 are legal arguments and/or conclusions to which no response is
27 required. To the extent any allegations in Paragraph 133 may be deemed factual, the Attorney
28 General denies them.

1 134. The Attorney General admits that *Obergefell* speaks for itself. The remaining
2 allegations in Paragraph 134 are legal arguments and/or conclusions to which no response is
3 required. To the extent any allegations in Paragraph 134 may be deemed factual, the Attorney
4 General denies them.

5 135. The Attorney General admits that the quoted language in Paragraph 135 appears in
6 *Shuttlesworth v. City of Birmingham*, 394 U.S. 147 (1969) and that *Shuttlesworth* speaks for
7 itself. The Attorney General denies that any individual is permitted to defy California law. The
8 remaining allegations in Paragraph 135 are legal arguments and/or conclusions to which no
9 response is required. To the extent any allegations in Paragraph 135 may be deemed factual, the
10 Attorney General denies them.

11 **PLAINTIFFS SEEK DECLARATORY AND INJUNCTIVE RELIEF**

12 136. The Attorney General admits that *Bruen* speaks for itself and denies any
13 constitutional violation. The remaining allegations in Paragraph 136 are legal arguments and/or
14 conclusions to which no response is required. To the extent any allegations in Paragraph 136 may
15 be deemed factual, the Attorney General denies them.

16 137. The Attorney General admits that the district court opinion and statutes cited in
17 Paragraph 137 and footnote 26 speak for themselves and denies any constitutional violation. The
18 Attorney General lacks sufficient information to form a belief as to the truth of the remaining
19 allegations in footnote 26 and on that basis denies them. The remaining allegations in Paragraph
20 137 and footnote 25 are characterizations of Plaintiffs claims and the relief Plaintiffs seek to
21 which no response is required. To the extent any of the remaining allegations in Paragraph 137,
22 including footnote 25, may be deemed factual, the Attorney General denies them.

23 138. The allegations in Paragraph 138 are characterizations of the relief Plaintiffs seek to
24 which no response is required. To the extent any of the allegations in Paragraph 138 may be
25 deemed factual, the Attorney General denies them.

26 139. The Attorney General admits that California Penal Code section 26150 speaks for
27 itself. The remaining allegations in Paragraph 139 are legal arguments and/or conclusions to
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1 which no response is required. To the extent any allegations in Paragraph 139 may be deemed
2 factual, the Attorney General denies them.

3 140. The Attorney General denies that the option to require a psychological exam as part
4 of the process for obtaining a carry permit is unconstitutional. The remaining allegations in
5 Paragraph 140 are characterizations of the relief Plaintiffs seek to which no response is required.
6 To the extent any of the remaining allegations in Paragraph 140 may be deemed factual, the
7 Attorney General denies them.

8 141. The Attorney General admits that California Penal Code section 26190 speaks for
9 itself. The remaining allegations in Paragraph 141 are legal arguments and/or conclusions to
10 which no response is required. To the extent any allegations in Paragraph 141 may be deemed
11 factual, the Attorney General denies them.

12 142. The Attorney General admits that *Bruen* and California Penal Code section
13 26190(f)(1) speak for themselves and denies that the option to require a psychological exam as
14 part of the process for obtaining a carry permit is unconstitutional. The remaining allegations in
15 Paragraph 142 are legal arguments and/or conclusions to which no response is required. To the
16 extent any allegations in Paragraph 142 may be deemed factual, the Attorney General denies
17 them.

18 143. The allegations in Paragraph 143 and footnote 27 are characterizations of Plaintiffs'
19 claims and the relief Plaintiffs seek to which no response is required. To the extent any of the
20 allegations in Paragraph 143, including footnote 27, may be deemed factual, the Attorney General
21 denies them. The Attorney General denies that the relief described in the allegations in Paragraph
22 143 is warranted or proper.

23 144. The allegations in Paragraph 144 are characterizations of the relief Plaintiffs seek to
24 which no response is required. To the extent any of the allegations in Paragraph 144 may be
25 deemed factual, the Attorney General denies them. The Attorney General denies that the relief
26 described in the allegations in Paragraph 144 is warranted or proper.

27 145. The allegations in Paragraph 145 are characterizations of the relief Plaintiffs seek to
28 which no response is required. To the extent any of the allegations in Paragraph 145 may be

1 deemed factual, the Attorney General denies them. The Attorney General denies that the relief
2 described in the allegations in Paragraph 145 is warranted or proper.

3 146. The Attorney General admits that *Bruen* speaks for itself. The remaining allegations
4 in Paragraph 146, including subparts a–h, are legal arguments and/or conclusions to which no
5 response is required. To the extent any allegations in Paragraph 146, including subparts a–h, may
6 be deemed factual, the Attorney General denies them.

7 **FIRST CLAIM FOR DECLARATORY AND INJUNCTIVE RELIEF**
8 **U.S. CONST. AMENDS. II, XIV**
9 **RIGHT TO BEAR ARMS**
10 **42 U.S.C. § 1983**

11 **AGAINST DEFENDANTS LOS ANGELES COUNTY SHERIFF'S**
12 **DEPARTMENT, SHERIFF ROBERT LUNA, AND DOES 1-10**

13 147. The Attorney General re-alleges and incorporates by references his answers in the
14 foregoing paragraphs as if set forth fully herein.

15 148. The allegations in Paragraph 148 are not directed to the Attorney General and thus
16 no response by him is required. To the extent any allegations in Paragraph 148 require a
17 response, the Attorney General denies them.

18 149. The allegations in Paragraph 149 are not directed to the Attorney General and thus
19 no response by him is required. To the extent any allegations in Paragraph 149 require a
20 response, the Attorney General denies them.

21 150. The allegations in Paragraph 150 are not directed to the Attorney General and thus
22 no response by him is required. To the extent any allegations in Paragraph 150 require a
23 response, the Attorney General denies them.

24 151. The allegations in Paragraph 151 are not directed to the Attorney General and thus
25 no response by him is required. To the extent any allegations in Paragraph 151 require a
26 response, the Attorney General denies them.

27 152. The allegations in Paragraph 152 are not directed to the Attorney General and thus
28 no response by him is required. To the extent any allegations in Paragraph 152 require a
response, the Attorney General denies them.

1 153. The allegations in Paragraph 153 are not directed to the Attorney General and thus
2 no response by him is required. To the extent any allegations in Paragraph 153 require a
3 response, the Attorney General denies them.

4 **SECOND CLAIM FOR DECLARATORY AND INJUNCTIVE RELIEF**
5 **U.S. CONST. AMENDS. II, XIV**
6 **RIGHT TO BEAR ARMS**
7 **42 U.S.C. § 1983**

8 **AGAINST DEFENDANTS LA VERNE POLICE DEPARTMENT, LA VERNE**
9 **CHIEF OF POLICE SAMUEL GONZALEZ, AND DOES 1-10**

10 154. The Attorney General re-alleges and incorporates by references his answers in the
11 foregoing paragraphs as if set forth fully herein.

12 155. The allegations in Paragraph 155 are not directed to the Attorney General and thus
13 no response by him is required. To the extent any allegations in Paragraph 155 require a
14 response, the Attorney General denies them.

15 156. The allegations in Paragraph 156 are not directed to the Attorney General and thus
16 no response by him is required. To the extent any allegations in Paragraph 156 require a
17 response, the Attorney General denies them.

18 157. The allegations in Paragraph 157 are not directed to the Attorney General and thus
19 no response by him is required. To the extent any allegations in Paragraph 157 require a
20 response, the Attorney General denies them.

21 158. The allegations in Paragraph 158 are not directed to the Attorney General and thus
22 no response by him is required. To the extent any allegations in Paragraph 158 require a
23 response, the Attorney General denies them.

24 159. The allegations in Paragraph 159 are not directed to the Attorney General and thus
25 no response by him is required. To the extent any allegations in Paragraph 159 require a
26 response, the Attorney General denies them.

27 160. The allegations in Paragraph 160 are not directed to the Attorney General and thus
28 no response by him is required. To the extent any allegations in Paragraph 160 require a
response, the Attorney General denies them.

THIRD CLAIM FOR DECLARATORY AND INJUNCTIVE RELIEF
U.S. CONST. AMENDS. II, XIV
RIGHT TO BEAR ARMS
42 U.S.C. § 1983

AGAINST ATTORNEY GENERAL ROB BONTA, AND DOES 1-10

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4 161. The Attorney General re-alleges and incorporates by references his answers in the
5 foregoing paragraphs as if set forth fully herein.

6 162. The Attorney General admits that the quoted language in Paragraph 162 appears in
7 *Bruen* and that *Bruen* speaks for itself. To the extent any allegations in Paragraph 162 may be
8 deemed factual, the Attorney General denies them.

9 163. The allegations in Paragraph 163 are legal arguments and/or conclusions to which no
10 response is required. To the extent any allegations in Paragraph 163 may be deemed factual, the
11 Attorney General denies them.

12 164. The Attorney General admits that California does not honor carry permits from any
13 state other than California and that the process for obtaining a permit to carry firearms in
14 California is set forth by statute and regulation, which authorities speak for themselves.

15 165. The allegations in Paragraph 165 are legal arguments and/or conclusions to which no
16 response is required. To the extent any allegations in Paragraph 165 may be deemed factual, the
17 Attorney General denies them.

18 166. The allegations in Paragraph 166 are characterizations of Plaintiffs' claims to which
19 no response is required. To the extent any allegations in Paragraph 166 may be deemed factual,
20 the Attorney General denies them.

21 167. The allegations in Paragraph 167 are legal arguments and/or conclusions to which no
22 response is required. To the extent any allegations in Paragraph 167 may be deemed factual, the
23 Attorney General denies them.

24 168. The allegations in Paragraph 168 are legal arguments and/or conclusions to which no
25 response is required. To the extent any allegations in Paragraph 168 may be deemed factual, the
26 Attorney General denies them.

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1 **FOURTH CLAIM FOR DECLARATORY AND INJUNCTIVE RELIEF**
2 **VIOLATIONS OF THE CALIFORNIA PENAL CODE**
3 **AGAINST DEFENDANTS LOS ANGELES COUNTY SHERIFF'S**
4 **DEPARTMENT, SHERIFF ROBERT LUNA, AND DOES 1-10**

5 169. The Attorney General re-alleges and incorporates by references his answers in the
6 foregoing paragraphs as if set forth fully herein.

7 170. The allegations in Paragraph 170 are not directed to the Attorney General and thus
8 no response by him is required. To the extent any allegations in Paragraph 170 require a
9 response, the Attorney General denies them.

10 171. The allegations in Paragraph 171 are not directed to the Attorney General and thus
11 no response by him is required. To the extent any allegations in Paragraph 171 require a
12 response, the Attorney General denies them.

13 172. The allegations in Paragraph 172 are not directed to the Attorney General and thus
14 no response by him is required. To the extent any allegations in Paragraph 172 require a
15 response, the Attorney General denies them.

16 173. The allegations in Paragraph 173 are not directed to the Attorney General and thus
17 no response by him is required. To the extent any allegations in Paragraph 173 require a
18 response, the Attorney General denies them.

19 **FIFTH CLAIM FOR DECLARATORY AND INJUNCTIVE RELIEF**
20 **VIOLATIONS OF THE CALIFORNIA PENAL CODE**
21 **AGAINST DEFENDANTS LA VERNE POLICE DEPARTMENT, LA VERNE**
22 **CHIEF OF POLICE SAMUEL GONZALEZ, AND DOES 1-10**

23 174. The Attorney General re-alleges and incorporates by references his answers in the
24 foregoing paragraphs as if set forth fully herein.

25 175. The allegations in Paragraph 175 are not directed to the Attorney General and thus
26 no response by him is required. To the extent any allegations in Paragraph 175 require a
27 response, the Attorney General denies them.

28 176. The allegations in Paragraph 176 are not directed to the Attorney General and thus
 no response by him is required. To the extent any allegations in Paragraph 176 require a
 response, the Attorney General denies them.

1 177. The allegations in Paragraph 177 are not directed to the Attorney General and thus
2 no response by him is required. To the extent any allegations in Paragraph 177 require a
3 response, the Attorney General denies them.

4 178. The allegations in Paragraph 178 are not directed to the Attorney General and thus
5 no response by him is required. To the extent any allegations in Paragraph 178 require a
6 response, the Attorney General denies them.

7 179. The allegations in Paragraph 179 are not directed to the Attorney General and thus
8 no response by him is required. To the extent any allegations in Paragraph 179 require a
9 response, the Attorney General denies them.

10 180. The allegations in Paragraph 180 are not directed to the Attorney General and thus
11 no response by him is required. To the extent any allegations in Paragraph 180 require a
12 response, the Attorney General denies them.

13 **SIXTH CLAIM FOR DECLARATORY AND INJUNCTIVE RELIEF**
14 **U.S. CONST. AMENDS. XIV**
15 **EQUAL PROTECTION**
16 **42 U.S.C. § 1983**

17 **AGAINST ATTORNEY GENERAL ROB BONTA, AND DOES 1-10**

18 181. The Attorney General re-alleges and incorporates by references his answers in the
19 foregoing paragraphs as if set forth fully herein.

20 182. The Attorney General admits that the processes for obtaining a California
21 identification card or driver's license are set forth by statute, regulation, or other rule and that
22 those authorities speak for themselves. The Attorney General lacks sufficient information to form
23 a belief as to the truth of the remaining allegations in Paragraph 182 and on that basis denies
24 them.

25 183. The Attorney General lacks sufficient information to form a belief as to the truth of
26 the allegations in Paragraph 183 and on that basis denies them.

27 184. The Attorney General lacks sufficient information to form a belief as to the truth of
28 the allegations in Paragraph 184 and on that basis denies them.

1 185. The Attorney General admits that the process for obtaining a permit to carry
2 firearms in California is set forth by statute and regulation and that those authorities speak for
3 themselves.

4 186. The allegations in Paragraph 186 are legal arguments and/or conclusions to which no
5 response is required. To the extent any allegations in Paragraph 186 may be deemed factual, the
6 Attorney General denies them.

7 187. The Attorney General admits that the authorities cited in Paragraph 187 speak for
8 themselves. The remaining allegations in Paragraph 187 are legal arguments and/or conclusions
9 to which no response is required. To the extent any allegations in Paragraph 187 may be deemed
10 factual, the Attorney General denies them.

11 **SEVENTH CLAIM FOR DECLARATORY AND INJUNCTIVE RELIEF**
12 **U.S. CONST. ART. IV, § 2**
13 **PRIVILEGES AND IMMUNITIES CLAUSE**
14 **42 U.S.C. § 1983**

15 **AGAINST ATTORNEY GENERAL ROB BONTA, AND DOES 1-10**

16 188. The Attorney General re-alleges and incorporates by references his answers in the
17 foregoing paragraphs as if set forth fully herein.

18 189. The Attorney General admits that the Privileges and Immunities Clause of Article
19 IV, § 2 of the United States Constitution and other authorities quoted and cited in Paragraph 189
20 speak for themselves.

21 190. The Attorney General lacks sufficient information to form a belief as to the truth of
22 the allegations in Paragraph 190 and on that basis denies them.

23 191. The Attorney General admits that the process for obtaining a permit to carry
24 firearms in California is set forth by statute and regulation and that those authorities speak for
25 themselves. The Attorney General lacks sufficient information to form a belief as to the truth of
26 the remaining allegations in Paragraph 191 and on that basis denies them.

27 192. The Attorney General lacks sufficient information to form a belief as to the truth of
28 the allegations in Paragraph 192 and on that basis denies them.

1 193. The allegations in Paragraph 193 are legal arguments and/or conclusions to which no
2 response is required. To the extent any allegations in Paragraph 193 may be deemed factual, the
3 Attorney General denies them.

4 194. The allegations in Paragraph 194 are legal arguments and/or conclusions to which no
5 response is required. To the extent any allegations in Paragraph 194 may be deemed factual, the
6 Attorney General denies them.

7 **EIGHTH CLAIM FOR DECLARATORY AND INJUNCTIVE RELIEF**
8 **U.S. CONST. AMENDMENT XIV**
9 **DUE PROCESS OF LAW**
10 **42 U.S.C. § 1983**

11 AGAINST LOS ANGELES COUNTY SHERIFF’S DEPARTMENT, SHERIFF
12 ROBERT LUNA, LA VERNE POLICE DEPARTMENT, LA VERNE CHIEF OF
13 POLICE SAMUEL GONZALEZ, ATTORNEY GENERAL ROB BONTA, AND
14 DOES 1-10

15 195. The allegations in Paragraph 195 are legal arguments and/or conclusions to which no
16 response is required. To the extent any allegations in Paragraph 195 may be deemed factual, the
17 Attorney General denies them.

18 196. The allegations in Paragraph 196 are legal arguments and/or conclusions to which no
19 response is required. To the extent any allegations in Paragraph 196 may be deemed factual, the
20 Attorney General denies them.

21 197. The allegations in Paragraph 197 are legal arguments and/or conclusions to which no
22 response is required. To the extent any allegations in Paragraph 197 may be deemed factual, the
23 Attorney General denies them.

24 198. The allegations in Paragraph 198 are legal arguments and/or conclusions to which no
25 response is required. To the extent any allegations in Paragraph 198 may be deemed factual, the
26 Attorney General denies them.

27 199. The allegations in Paragraph 199 are legal arguments and/or conclusions to which no
28 response is required. To the extent any allegations in Paragraph 199 may be deemed factual, the
Attorney General denies them.

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PRAYER FOR RELIEF

WHEREFORE, the Attorney General prays that:

- 1. Plaintiffs take nothing by reason of their First Amended and Supplemental Complaint;
- 2. Judgment be entered in favor of the Attorney General and adverse to Plaintiffs;
- 3. The Attorney General be awarded costs in defending this action; and
- 4. The Attorney General be awarded any such further relief that the Court may deem just and proper.

Dated: October 28, 2024

Respectfully submitted,

ROB BONTA
Attorney General of California
MARK R. BECKINGTON
Supervising Deputy Attorney General

s/ Christina R.B. López
CHRISTINA R.B. LÓPEZ
Deputy Attorney General
Attorneys for Defendant Rob Bonta