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August 27, 2026

VIA U.S. Mail

Glendale Police Department Interim Chief Robert William
131 N. Isabel Street
Glendale, CA 91206

City of Glendale Attorney's Office
613 E. Broadway., Suite 220
Glendale, CA 91206

Re: Excessive CCW Application and Renewal Fees

To the Glendale Police Department:

We write on behalf of the California Rifle and Pistol Association, Incorporated ("CRPA"), its members, and law-abiding gun owners who reside or work within the City of Glendale and are subject to your Department's fee schedule for obtaining a license to carry a concealed weapon ("CCW") under California Penal Code sections 26150 through 26235.

It has come to our attention that your Department has dramatically increased its CCW fees. Apparently, Glendale now charges \$1,078 for new CCW applications and \$828 for renewals.¹ When combined with the additional costs that applicants must bear for mandatory training courses, Live Scan fingerprinting, and psychological examinations, the total cost to obtain or renew a CCW license through your Department can exceed \$2,000. These fees are among the highest in the state.

I. Glendale's Fees Exceed the Statutory Limits of Penal Code § 26190

California Penal Code section 26190 strictly limits the fees that a local licensing authority may charge CCW applicants. Subdivision (b)(1) provides that a city may charge "an additional fee in an amount equal to the reasonable costs for processing the application for a new license or a license renewal, issuing the license, and enforcing the license." Subdivision (c) further provides that "[i]n no case shall the local fees exceed the reasonable costs to the licensing authority." These are not aspirational guidelines. They are statutory mandates.

¹ <https://glendalepdca.permitium.com/ccw/start>

A fee of \$1,078 for new applications and \$828 for renewals bears no plausible relationship to the actual and reasonable administrative costs of processing a CCW application, conducting a background investigation, and issuing a license. By way of comparison, the Los Angeles County Sheriff's Department, which processes CCW applications for the most populous county in the nation, charges a \$43 initial application fee and a \$173 issuance fee, for a combined total of \$216. Orange County charges a \$300 local fee. Sacramento County charges a \$48 application fee and a \$190 issuance fee. Glendale's fees are multiples of what comparable and far larger jurisdictions charge, and there is no reasonable basis for such a disparity.

We are aware of no cost study or analysis that would justify fees at this level. If your Department has prepared such a study, we request that it be provided to us promptly. We have separately submitted a Public Records Act request seeking all documents related to the calculation and establishment of these fees.

II. Mandatory Psychological Examinations Without Individualized Cause

To the extent your Department requires all CCW applicants to undergo a psychological examination, that practice exceeds the authority granted by Penal Code section 26190(e) and violates several provisions of the U.S. Constitution. Subdivision (e)(1) provides that the licensing authority *may* require a psychological assessment on an initial application, but does not mandate one for every applicant. Subdivision (e)(2) provides that additional psychological assessment on renewal "shall be required only if there is compelling evidence of a public safety concern to indicate that an assessment is necessary."

Imposing a blanket requirement of psychological testing—at additional cost to the applicant—is unconstitutional, both on its face and as applied to any applicant without a history of mental illness. Indeed, it functions as yet another financial barrier to exercising fundamental Second Amendment rights rather than as a legitimate public safety measure. Moreover, imposing mandatory psychological testing as a condition for exercising fundamental rights—without an individualized showing supported by probable cause, admissible evidence, notice and an opportunity to be heard, right to counsel, right to cross-examine a witness, and the right to appeal—violates applicants' procedural due process rights under the Fourteenth Amendment.

III. The Constitutional Framework After *Bruen*

In *New York State Rifle & Pistol Association v. Bruen*, 597 U.S. 1 (2022), the Supreme Court reaffirmed that the right to keep and bear arms for self-defense is a fundamental, individually held right that extends beyond the home. The Court invalidated discretionary licensing schemes that impose subjective or overly burdensome requirements on the exercise of that right and held that firearm regulations must be consistent with the Nation's historical tradition of firearm regulation.

A fee structure that requires applicants to pay more than \$2,000 to exercise a constitutional right is inconsistent with any historical tradition. It is a wealth qualification, pure and simple. It prices out law-abiding residents of modest means and disproportionately burdens the very communities that most need access to lawful self-defense. Such a scheme cannot withstand scrutiny under the framework established by the Supreme Court in *Bruen*.

IV. Active Litigation Against Jurisdictions with Comparable Fee Structures

Glendale is not operating in a vacuum. CRPA, together with the Second Amendment Foundation, filed suit in September 2025 against the Santa Clara County Sheriff's Department over a materially similar fee structure. In *Blank v. Santa Clara County Sheriff's Department*, No. 5:25-cv-08027 (N.D. Cal.), the plaintiffs challenge Santa Clara's \$976 application fee and mandatory psychological examination as unconstitutional burdens on Second Amendment rights. That case, currently pending before Judge Edward J. Davila, alleges that Santa Clara's fees "merely substitut[e] an unconstitutional wealth qualification for a corrupt political patronage scheme that has the effect of suppressing its residents' Second Amendment rights." Glendale's fees now far exceed those challenged in *Blank*.

Additionally, in September 2025, the United States Department of Justice filed its first-ever affirmative lawsuit in support of gun owners, alleging that the Los Angeles County Sheriff's Department engaged in a pattern and practice of infringing Second Amendment rights through its CCW permitting process. The federal government's willingness to bring enforcement actions against California law enforcement agencies for CCW-related violations underscores the seriousness with which these issues are being treated at every level.

Other California jurisdictions have already reformed their practices in response to this legal landscape. The City of La Verne, following a lawsuit by CRPA, agreed to significantly reduce its CCW application fees, which had previously exceeded \$1,000, and paid CRPA's attorneys' fees as part of a settlement. La Verne's experience illustrates that jurisdictions that persist in maintaining excessive fee structures face substantial litigation risk and financial exposure.

V. Requested Action

We respectfully request that the Glendale Police Department take the following steps within twenty-one (21) days of the date of this letter:

1. Immediately reduce its CCW application and renewal fees to amounts that reflect the actual, reasonable costs of processing applications and issuing licenses, consistent with the mandates of both Penal Code § 26190(b) and (c) and the U.S. Constitution.
2. Provide CRPA with a detailed accounting of the costs your Department incurs in processing a CCW application, issuing a license, and enforcing the license, including all staff time, equipment, software, and overhead components, so that the reasonableness of any revised fee schedule can be independently evaluated.

3. Eliminate any blanket requirement that all CCW applicants submit to a psychological examination and limit such examinations to the circumstances permitted by Penal Code § 26190(e).
4. Review and align the Department's overall CCW fee structure and application process with the constitutional standards articulated in *Bruen* and the practices of other California jurisdictions.

CRPA is committed to working with local jurisdictions to bring their CCW practices into compliance with state and federal law. We would prefer to resolve this matter cooperatively. Should the Department decline to take corrective action within the timeframe specified above, however, CRPA is prepared to pursue all available legal remedies to protect the rights of its members and the broader community of law-abiding gun owners, including litigation seeking injunctive and declaratory relief, as well as attorneys' fees under 42 U.S.C. § 1988.

Thank you for your attention to this matter. We look forward to your prompt response.

Sincerely,
Michel & Associates, P.C.

A handwritten signature in dark ink, appearing to read 'MC', with a stylized flourish extending from the end.

Matthew Cubeiro