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February 21, 2023

VIA U.S. CERTIFIED MAIL

Robert G. Luna, Sheriff
Los Angeles County Sheriff's Department
211 W Temple Street
Los Angeles, CA 90012

9314 8699 0430 0104 6847 97

Office of the County Counsel
Kenneth Hahn Hall of Administration
500 West Temple Street #648
Los Angeles, CA 90012

9314 8699 0430 0104 6849 88

County Counsel Sheriff Services
Hall of Justice
211 W Temple Street, 8th Floor
Los Angeles, CA 90012

9314 8699 0430 0104 6857 25

Re: LASD's Unconstitutional CCW Processing Wait Times

Dear Sheriff Luna:

Our firm represents the California Rifle & Pistol Association (CRPA), which was founded in 1875 and has been working to uphold the right of Californians to keep and bear arms ever since. On behalf of CRPA, we would like to congratulate you on being elected Sheriff of Los Angeles County. We wish you all the best as you take on the challenges of that office.

We write today concerning a number of complaints we have received from CRPA members related to the excessive amount of time the Los Angeles County Sheriff's Department (LASD) is taking to process CCW permit applications. CRPA understands that as you have only recently been sworn in as Sheriff, you didn't cause this problem. However, as the Sheriff, it is now your duty to see to it that all law-abiding applicants have their CCW permit applications processed in accordance with state and federal law. Right now, many of our members' constitutional rights are being denied as their permit applications languish for month after month.

Your predecessor made important strides in honoring the constitutional right to carry, both before and after the landmark ruling of *N.Y. State Rifle & Pistol Ass'n v. Bruen*, 597 U.S. ___, 142 S. Ct. 2111 (2022) ("*Bruen*"). Unfortunately, the long processing times were never addressed, even after LASD only began accepting applications for residents who live in unincorporated parts of the county or contract cities last August.

Several CRPA members applied last summer following the *Bruen* decision, and their applications have had little or no action. Following an application submission, it frequently takes an applicant over six months or longer just to get the initial interview, which is only the first step in the process. Some CRPA members have been waiting over a year since their application was first submitted. This violates *Bruen*, which explained that “because any permitting scheme can be put toward abusive ends, we do not rule out constitutional challenges to shall-issue regimes where, for example, **lengthy wait times** in processing license applications or exorbitant fees deny ordinary citizens their right to public carry.” *Bruen*, 142 S. Ct. at n.9 (emphasis added). The lengthy processing times also violate California law, which states that permit decisions must be made within 90 days of the initial application or 30 days after receipt of the applicant’s background check from the Department of Justice, whichever is later. Cal. Penal Code § 26205.

The right to carry a firearm for self-defense is a fundamental constitutional right. Sheriffs should not treat that finding lightly nor disregard the laws of this state. If these issues are not corrected soon, CRPA will have no choice but to file a lawsuit to see to it that *Bruen* and California Law are honored by LASD. That is not CRPA’s first preference, as we would much rather work with you to find ways to fix these issues and gradually bring LASD into compliance.

As such, we propose the following: if LASD is willing to inform CRPA of the measures it will promptly take to reduce processing times, and to provide updates over the coming months confirming that processing times are finally coming down, then CRPA is willing to hold off on litigation for now. This would give you, as the new Sheriff, a fair amount of time to correct the situation you inherited from your predecessor. We believe such an arrangement would be much more favorable to LASD than a potential preliminary injunction ruling that forces the department to *immediately* take no longer than 90 days to process applications, which is what we would seek if we were forced to file a lawsuit. Given how clear both *Bruen* and California law are on excessive wait times, we are confident we would prevail in court if it came to that.

To the extent LASD under your leadership intends to quickly work to correct the processing time issue, CRPA is happy to offer its guidance and assistance on any questions you may have. If we do not receive any response, or if your response indicates that you will do nothing to correct the current unacceptably long processing times, then we will have no other recourse but to turn to the courts for relief. We’ll wait until **March 13, 2023** to hear back from you. After that, if no response is received, we’ll advise CRPA that a lawsuit is their only option.

Sincerely,
Michel & Associates, P.C.



Konstadinos T. Moros



February 28, 2023

Dear WALZ GROUP:

The following is in response to your request for proof of delivery on your item with the tracking number: **9314 8699 0430 0104 6847 97**.

Item Details

Status:	Delivered, Front Desk/Reception/Mail Room
Status Date / Time:	February 27, 2023, 03:47 p.m.
Location:	LOS ANGELES, CA 90012
Postal Product:	First-Class Mail®
Extra Services:	Certified Mail™ Return Receipt Electronic
Recipient Name:	Robert G Luna Sheriff Los Angeles County Sheri


Shipment Details

Weight:	1.0oz
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Destination Delivery Address

Street Address:	211 W TEMPLE ST FL 12
City, State ZIP Code:	LOS ANGELES, CA 90012-4455

Recipient Signature

Signature of Recipient:	 E. LUNA
Address of Recipient:	211 Temple

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Sincerely,
United States Postal Service®
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Washington, D.C. 20260-0004



February 28, 2023

Dear WALZ GROUP:

The following is in response to your request for proof of delivery on your item with the tracking number: **9314 8699 0430 0104 6857 25**.

Item Details

Status:	Delivered, Front Desk/Reception/Mail Room
Status Date / Time:	February 27, 2023, 03:47 p.m.
Location:	LOS ANGELES, CA 90012
Postal Product:	First-Class Mail®
Extra Services:	Certified Mail™ Return Receipt Electronic
Recipient Name:	County Counsel Sheriff Services Hall of Justice



Shipment Details

Weight:	1.0oz
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Destination Delivery Address

Street Address:	211 W TEMPLE ST FL 8
City, State ZIP Code:	LOS ANGELES, CA 90012-4455

Recipient Signature

Signature of Recipient:	
Address of Recipient:	

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475 L'Enfant Plaza SW
Washington, D.C. 20260-0004



October 19, 2022

Dear WALZ GROUP:

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Item Details

Status: Delivered, Left with Individual
Status Date / Time: October 18, 2022, 11:14 a.m.
Location: HAMILTON, MT 59840
Postal Product: First-Class Mail®
Extra Services: Certified Mail™
Return Receipt Electronic
Recipient Name: Matthew Janes Second Amendment Sports Inc

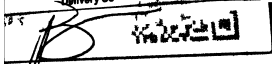
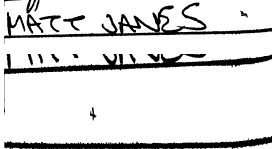
Shipment Details

Weight: 2.0oz

Destination Delivery Address

Street Address: 319 RICKETTS RD
City, State ZIP Code: HAMILTON, MT 59840-9528

Recipient Signature

Signature of Recipient:	
Address of Recipient:	

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