

# **EXHIBIT 1**

MICHELLE FLANAGAN  
MICHELLE FLANAGAN vs CALIFORNIA ATTORNEY

April 26, 2017  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MICHELLE FLANAGAN, SAMUEL  
GOLDEN, DOMINIC NARDONE,  
JACOB PERKIO, and THE  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION,

Plaintiffs,

vs.

No. 2:16-cv-06164  
JAK-AS

CALIFORNIA ATTORNEY  
GENERAL XAVIER BECERRA, in  
his official capacity as  
Attorney General of the  
State of California,  
SHERIFF JAMES McDONNELL, in  
his official capacity as  
Sheriff of Los Angeles  
County, California, and  
DOES 1-10,

Defendants.

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DEPOSITION OF  
MICHELLE FLANAGAN

Wednesday, April 26, 2017

9:35 A.M. - 10:10 A.M.

300 S. Spring Street, Suite 1702  
Los Angeles, California

Nancy Collier Hamada, CSR No. 5819



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APPEARANCES OF COUNSEL

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INDEX OF EXAMINATION

WITNESS: MICHELLE FLANAGAN

EXAMINATION PAGE

BY MS. LI 5

INFORMATION REQUESTED

(NONE)

WITNESS INSTRUCTION NOT TO ANSWER

| Page | Line |
|------|------|
| 10   | 24   |
| 19   | 15   |

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
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18  
19  
20  
21  
22  
23  
24  
25

INDEX TO EXHIBITS

| Exhibit | Description                                                      | Page |
|---------|------------------------------------------------------------------|------|
| 1       | Notice of Deposition                                             | 7    |
| 2       | Flanagan's application<br>package to carry a concealed<br>weapon | 29   |

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
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DEPOSITION OF MICHELLE FLANAGAN

Wednesday, April 26, 2017

MICHELLE FLANAGAN,

having been first duly sworn, testifies as follows:

EXAMINATION

BY MS. LI:

Q Good morning.

A Good morning.

Q My name is Patty Li. I represent the California Attorney General in this litigation which is known as Flanagan vs. Becerra.

Can you state your full name and spell the last name for the record?

A Michelle Flanagan, F, as in Frank, l-a-n-a-g-a-n.

Q Thank you. Do you understand that you are testifying here today under the same oath that you would take if you were to testify in a courtroom?

A Yes.

Q Have you ever had your deposition taken?

A Many years ago, and I don't even remember why. I think it was a car accident or something,

1 Wherever I go, I would like the -- to legally be  
2 able to carry a firearm, whether it be open or  
3 concealed, however is legally allowed, but I do  
4 strongly believe that I should have the right to  
5 protect myself.

6 BY MS. LI:

7 Q Do you have a preference in terms of  
8 carry concealed versus carrying openly if it were  
9 allowed for you to carry in public?

10 A My preference is concealed.

11 Q Can you tell me why?

12 A Because not everyone takes owning a  
13 firearm or handling a firearm as seriously as I  
14 do. There are people who would possibly be upset  
15 that I was carrying a firearm if they didn't know  
16 me, and I wouldn't want to upset anyone I was  
17 around. I feel it much more professional to not  
18 show everyone my business. I don't walk around  
19 with my wallet open or my cell phone open.  
20 Therefore, carrying concealed seems to me to be  
21 much more professional and responsible.

22 Q So it sounds like if you had a choice  
23 between carrying concealed and carrying openly,  
24 you would choose to carry concealed; is that  
25 correct?