

EXHIBIT 3

SAMUEL GOLDEN
FLANAGAN vs CALIFORNIA ATTORNEY GENERAL

May 01, 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,)

Plaintiff(s),)

vs.)

CASE 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.)

DEPOSITION OF
SAMUEL GOLDEN

May 1, 2017

2:39 p.m.

300 South Spring Street
Suite 1702
Los Angeles, California

Maria Lozano, CSR NO. 13687



1 APPEARANCES OF COUNSEL

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INFORMATION REQUESTED

(None)

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DEPOSITION OF SAMUEL GOLDEN

May 1, 2017

SAMUEL GOLDEN,
having been first duly sworn through the court reporter,
testified as follows:

EXAMINATION

BY MS. LI:

Q. Hi, can you please state your name and spell your last name for the record?

A. Samuel Thomas Golden, G-o-l-d-e-n.

Q. Have you ever had your deposition taken before?

A. Yes.

Q. Approximately when was that?

A. I don't recall.

Q. Was it months ago, years ago?

A. Years.

Q. The court reporter is recording everything that we say so we should try to only one person speaking at a time; that means I will try to let you finish answering the question before I ask my next question. And if you could let me finish asking a question before you start to answer, that would be great. If you need to take a break at any time, just let me know. If there's a question pending and you need

1 Q. Without --

2 A. Or the ability to carry and defend myself.

3 Q. And do you have a preference in terms of carrying
4 concealed or carrying openly?

5 A. Yes.

6 Q. What is your preference?

7 A. Concealed.

8 Q. And can you tell me why?

9 A. Because I believe that open carry can be a problem
10 in of itself. If a bad person -- if a bad guy wants to take
11 something from me and he can see that I have a gun, he'll
12 probably kill me before he takes what he wants. If he
13 doesn't see I have a gun, I might have a fighting chance.

14 Q. So you think concealed carry is safer for you in
15 terms of if you were to encounter a bad guy?

16 A. Yes.

17 Q. Are there any other reasons why you prefer a
18 concealed carry over open carrying?

19 A. I'm not crazy about everybody and their brother
20 knowing that I have a gun. I don't want to advertise that
21 I'm carrying a firearm, I just want to be able to carry,
22 that's it.

23 Q. So is that -- is that a safety concern for -- on
24 your part? You think it's safer for you or rather you think
25 carrying openly could be a bit more dangerous for you?

1 A. I believe it's more dangerous and I believe it
2 could cause people to jump to a conclusion that is not
3 correct.

4 Q. What kind of conclusion?

5 A. Somebody that's anti-gun could just freak out
6 because I'm -- I happen to be standing next to them in the
7 grocery line with a gun on my hip.

8 Q. So even if open carry were permitted that person
9 might, quote, unquote, freak out, might have an oversized
10 reaction? Is that what you mean?

11 A. Yes.

12 Q. Did you decide to join this lawsuit after you
13 learned that your most recent application to the L.A. County
14 Sheriff had been denied?

15 A. No.

16 Q. When was -- when were you informed that your most
17 recent application had been denied?

18 A. After I joined the lawsuit.

19 Q. But you -- you had previously applied and been
20 denied before the lawsuit at some point; is that right?

21 A. Correct. But when I joined the lawsuit, my last
22 correspondence from the Sheriff's Department was not that
23 they were denying me, but that they were not making any
24 decisions because they were waiting for --

25 Q. Peruta?