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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

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12 RONALD NORDSTROM,) **CASE NO. 2:15-cv-07607-DMG-FFM**
13)
14 Plaintiff,) **FIRST AMENDED COMPLAINT**
15) **FOR SECOND AMENDMENT**
16 vs.) **VIOLATION- 42 U.S.C. § 1983**
17) **JURY TRIAL DEMANDED**
18 VENTURA COUNTY SHERIFF) **ATTORNEY FEES REQUESTED 42**
19 GEOFF DEAN,) **U.S.C. § 1988**
20 Defendants.)
21)
22)
23)
24)

25 COMES NOW Plaintiff, Ronald Nordstrom, pursuant to 42 U.S.C. § 1983.
26 Plaintiff alleges violations of his Second Amendment Rights by Defendant.

27 **INTRODUCTION**

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1. The California Legislature has mandated that the only method by which a resident of the State can bear arms for the purpose of self-defense outside the home is with a permit to carry a concealed weapon.
 2. Plaintiff is a resident of Ventura County and so applied to the county Sheriff for a permit to exercise his Fundamental Right.

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15. Thereafter, Defendant advised Plaintiff that there was no appeal process available to him.

16. Plaintiff is a law abiding citizen who has complied with all the requirements for the issuance of a permit to carry a concealed weapon and is not prohibited from owning or possessing a firearm.

17. Defendant, an elected official, denied Plaintiff’s license determining that he was not of “good moral character”. Such determination was not based upon any lawful standard, and instead was entirely based upon Defendant’s personal feelings.

18. Defendant’s improper exercise of discretion violates Plaintiff’s Second Amendment right to bear arms for self-defense and under Cantwell v. Connecticut (1940) 310 U.S. 296, and its progeny, States and localities may not condition a license necessary to engage in constitutionally protected conduct on the grant of a license officials have discretion to withhold.

PRAYER FOR RELIEF

19. For an order requiring Defendant to issue a Permit to Plaintiff without delay.

20. Such damages as permitted by law.

21. Costs and Attorneys’ fees pursuant to 42 U.S.C. § 1988.

January 14, 2016

_____/s/_____
Jonathan W. Birdt