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Attorney for Plaintiff Second Amendment Foundation

IN THE UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

JUNIOR SPORTS MAGAZINES  
 INC., RAYMOND BROWN,  
 CALIFORNIA YOUTH SHOOTING  
 SPORTS ASSOCIATION, INC.,  
 REDLANDS CALIFORNIA  
 YOUTH CLAY SHOOTING  
 SPORTS, INC., CALIFORNIA  
 RIFLE & PISTOL ASSOCIATION,  
 INCORPORATED, THE CRPA  
 FOUNDATION, AND GUN  
 OWNERS OF CALIFORNIA, INC.;  
 and SECOND AMENDMENT  
 FOUNDATION,

Plaintiffs,

v.

ROB BONTA, in his official capacity  
 as Attorney General of the State of  
 California; and DOES 1-10,

Defendant.

CASE NO: 2:22-cv-04663-CAS (JCx)

**DECLARATION OF ANNA M. BARVIR  
 IN SUPPORT OF PLAINTIFFS'  
 MOTION FOR PRELIMINARY  
 INJUNCTION**

Hearing Date: August 22, 2022  
 Hearing Time: 10:00 a.m.  
 Courtroom: 8D  
 Judge: Christina A. Snyder

**DECLARATION OF ANNA M. BARVIR**

1  
2 1. I, Anna M. Barvir, am an attorney at the law firm Michel &  
3 Associates, P.C., attorneys of record for Plaintiffs in this action. I am licensed to  
4 practice law before the United States District Court for the Central District of  
5 California. I am also admitted to practice before the Eastern, Northern, and  
6 Southern Districts of California, as well as the courts of the state of California, the  
7 Supreme Court of the United States, and the D.C., Fourth, Ninth, and Tenth Circuit  
8 Courts of Appeals. I have personal knowledge of the facts set forth herein and, if  
9 called and sworn as a witness, could and would testify competently thereto.

10 2. On July 18, 2022, I e-mailed Deputy Attorney General Kevin J. Kelly  
11 via email to inform him of Plaintiffs' intention to file a motion for preliminary  
12 injunction, as well as an ex parte application for an order shortening time to hear  
13 Plaintiffs' anticipated preliminary injunction motion. The Court has not yet ruled on  
14 Plaintiffs' ex parte application, and Mr. Kelly stated that his client would oppose  
15 Plaintiffs' it.

16 3. On or about July 19, 2022, I visited the New York Times website and  
17 viewed and saved a copy of Anna North, *Marketing Guns to Children*, N.Y. Times  
18 (Feb. 19, 2016), *available at* [https://archive.nytimes.com/takingnote.blogs.nytimes.](https://archive.nytimes.com/takingnote.blogs.nytimes.com/2016/02/19/marketing-guns-to-children/)  
19 [com/2016/02/19/marketing-guns-to-children/](https://archive.nytimes.com/takingnote.blogs.nytimes.com/2016/02/19/marketing-guns-to-children/). A true and correct copy is attached  
20 hereto as **Exhibit 28**.

21 4. On or about July 19, 2022, I visited and viewed the official Twitter  
22 feed of Assemblymember Rebecca Bauer-Kahan, the author of Assembly Bill 2571.  
23 From there, I viewed and saved a copy of Press Release, *Assemblymember Bauer-*  
24 *Kahan's Legislation to Regulate Gun Advertisements Targeting Children Heads to*  
25 *the Governor* (June 30, 2022), *available at* [https://twitter.com/BauerKahan/status/](https://twitter.com/BauerKahan/status/1542571180883730433)  
26 [1542571180883730433](https://twitter.com/BauerKahan/status/1542571180883730433). A true and correct copy is attached hereto as **Exhibit 29**.

27 5. On or about July 19, 2022, I visited the official website of  
28 Assemblymember Rebecca Bauer-Kahan, the author of Assembly Bill 2571. From

1 there, I viewed and saved a copy of Press Release, *Assemblymember Bauer-Kahan*  
2 *Introduces Legislation to Regulate Manipulative Gun Advertisements Targeting*  
3 *Children* (Feb. 18, 2022), available at [https://a16.asmdc.org/press-](https://a16.asmdc.org/press-releases/20220218-assemblymember-bauer-kahan-introduces-legislation-regulate-manipulative-gun)  
4 [releases/20220218-assemblymember-bauer-kahan-introduces-legislation-regulate-](https://a16.asmdc.org/press-releases/20220218-assemblymember-bauer-kahan-introduces-legislation-regulate-manipulative-gun)  
5 [manipulative-gun](https://a16.asmdc.org/press-releases/20220218-assemblymember-bauer-kahan-introduces-legislation-regulate-manipulative-gun). A true and correct copy is attached hereto as **Exhibit 30**.

6 6. On or about July 13, 2022, I visited and viewed the official Twitter  
7 feeds of Governor Gavin Newsom and Assemblymember Rebecca Bauer-Kahan.  
8 From there, I searched for “tweets” wherein they referenced Assembly Bill 2571 or  
9 AB 2571. I then saved a copy of each “tweet” search result. A true and correct copy  
10 of a collection relevant “tweets” from Governor Gavin Newsom and  
11 Assemblymember Rebecca Bauer-Kahan is attached hereto as **Exhibit 31**.

12 7. On or about July 19, 2022, I visited <https://wildlife.ca.gov/>, the official  
13 website for the State of California, Department of Fish & Wildlife. From there, I  
14 navigated to the page for “California Hunter Education” and viewed and saved a  
15 copy of State of California – Department of Fish & Wildlife DFW Form 1043:  
16 Student Consent. A true and correct copy is attached hereto as **Exhibit 32**.

17  
18 I declare under penalty of perjury that the foregoing is true and correct.  
19 Executed within the United States on July 19, 2022

20 s/ Anna M. Barvir

21 Anna M. Barvir

22 Declarant  
23  
24  
25  
26  
27  
28

# **EXHIBIT 28**

## The New York Times

The Opinion Pages

### Taking Note

# The Editorial Page Editor's Blog Marketing Guns to Children

By Anna North February 19, 2016 10:05 am

The gun industry markets a variety of products explicitly to children, a new report shows, from armed stuffed animals to lighter versions of rifles. And some see kids as a vital group of future gun buyers who need to be brought into the fold at a young age.

The report, called “Start Them Young” and issued on Thursday by the Violence Policy Center, lists a variety of firearms meant at least partly for children. It mentions the Crickett rifle, a gun made for children by the company Keystone Sporting Arms. Keystone’s website and some of its merchandise bear the image of “Davey Crickett,” a gun-wielding cartoon insect. The company sells Davey Crickett hats, dog tags and pins, as well as a Davey Crickett Beanie Baby, listed as “not for children under three years of age.”

Keystone’s website also sells books featuring “Little Jake,” a boy who uses his gun to bring down a bear and save an African village from a marauding elephant. The publisher of the books says Little Jake is actually older than he looks: “Little Jake is a fictional character in his late teens. While small in stature so that young children may relate to him, Little Jake is old enough to hunt and fish safely on his own without adult supervision.”

“Start Them Young” also cites the rise of .22-caliber versions of higher-caliber rifles, often produced with lightweight materials. According to an article in the trade magazine Shooting Sports Retailer, “these guns bring the coolness and fun of the tactical rifle to kids and less serious shooters.” The website of the retailer Gander Mountain describes one such weapon thus: “Designed for the indoor range and the youth shooter, this Carbon15 .22 LR Rimfire lightweight is sure to add new dimensions to your Bushmaster shooting pleasure. Operational controls are functionally and ergonomically identical to AR-15 type rifles.”

The report makes the case that the gun industry and some gun-rights advocates see putting guns in the hands of children as a crucial recruitment move. In a 2012 report, the National Shooting Sports Foundation, the gun industry's trade association, explicitly recommended that gun manufacturers market to children: "To help hunting and target shooting get a head start over other activities, stakeholders such as managers and manufacturers should target programs toward youth 12 years old and younger. This is the time that youth are being targeted with competing activities." An online ad for a Marlin XT rifle features a father and son and boasts, "FOR THE FUTURE OF OUR SPORT, IT'S THE MOST POWERFUL FIREARM ON EARTH." And the editor-in-chief of the magazine Junior Shooters wrote in 2012:

Each person who is introduced to the shooting sports and has a positive experience is another vote in favor of keeping our American heritage and freedom alive. They may not be old enough to vote now, but they will be in the future. And think about how many lives they will come in contact with that they can impact!

In 2015, at least 282 people were accidentally shot by a child under 18, according to the group Everytown for Gun Safety. This year, the count is already up to 33.

And while weapons designed for children may be lighter, they are still deadly — "Start Them Young" notes that a five-year-old Kentucky boy accidentally killed his two-year-old sister with a Crickett rifle in April 2013. He had gotten the gun as a birthday present.

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California Notices

California Notices

# **EXHIBIT 29**





## **Assemblymember Bauer-Kahan’s Legislation to Regulate Gun Advertisements Targeting Children Heads to the Governor**

*AB 2571 would prohibit the dangerous advertising of firearms to children and youth.*

For Immediate Release

June 30, 2022

Contact: Shawn Kumagai – [Shawn.Kumagai@asm.ca.gov](mailto:Shawn.Kumagai@asm.ca.gov)

925-244-1600 office

**Sacramento, CA** – Today, AB 2571 by Assemblymember Rebecca Bauer-Kahan (D-Orinda), which prohibits marketing firearms to children, passed the Assembly Floor on concurrence with a vote of 56 -14 This bill is part of Governor Newsom’s priority package of gun control measures, which will go into effect immediately upon his signature.

“Guns are not toys-- they are deadly weapons,” said Assemblymember Bauer-Kahan. “California has some of the strongest gun laws in the country and it is unconscionable that we still allow advertising weapons of war to our children. Our kids have a right to live long, happy lives, free of gun violence.”

Gun manufacturers view children as their next generation of advocates, targeting them with everything from children’s books about guns to special smaller weapons designed to make it easier for children to hold and shoot. The advertising for these weapons is completely shameless. Children in California are not allowed to buy or own a gun, yet guns are advertised specifically to children across all forms of media including cartoons, video games, and social media. Gun manufacturers use children’s books, mascots, apparel, guns adorned in cartoons, and brightly colored logos to appeal specifically to children and youth.[1] Firearm companies have expanded to advertising on social media platforms in order to connect youth to their gun-selling websites. These platforms include YouTube, Twitter, social media influencers, and streaming services that children and youth disproportionately frequent.



AB 2571 would prohibit firearm manufacturers from continuing their malicious and manipulative marketing programs targeting children and youth. It would allow the California Attorney General or a district attorney, city attorney, or a county counsel in California to bring a civil action for a violation. Additionally, it would prohibit a firearm industry member from using, disclosing, or compiling a minor's personal information if that information is intended to be used for advertising or marketing to that minor.

Gun violence has been cited as the third leading cause of death for Californian children and youth between ages 1-17. In 2021 nationwide, there were approximately 259 unintentional shootings by children, resulting in 104 deaths and 168 injuries.[2] 91% of the victims in these shootings by children were also under 18, often siblings of the children who did the shooting. This violence is pervasive and the trend is rising. Action to keep weapons out of the hands of children is long overdue.

AB 2571 is joint authored by Asm. Mike Gipson (D-Los Angeles), and coauthored by Asm. Jesse Gabriel (D-Woodland Hills), Asm. Christina Garcia (D - Downey), Asm. Miguel Santiago (D-Los Angeles), and Asm. Phil Ting (D – San Francisco).

###

[1] starttheyoung.pdf (vpc.org)

[2] <https://www.npr.org/2021/08/31/1032725392/guns-death-children>

# **EXHIBIT 30**

# Assemblymember Bauer-Kahan Introduces Legislation to Regulate Manipulative Gun Advertisements Targeting Children

## AB 2571 restricts dangerous advertising of firearms to children and youth.

### FOR IMMEDIATE RELEASE:

**Friday, February  
18, 2022**

Jordan Curley  
Chief of Staff  
916-319-2016  
[Jordan.curley@asm.ca.gov](mailto:Jordan.curley@asm.ca.gov)

**Sacramento, CA** – At a press conference today in San Diego, Assemblymember Rebecca Bauer-Kahan (D-Orinda), joined Governor Gavin Newsom, Attorney General Rob Bonta and others in announcing the introduction of AB 2571. AB 2571 seeks to restrict the malicious and manipulative firearms marketing geared towards children and youth. This bill comes at a time where California has experienced a collision of two major public health crises over the past years: COVID-19 and gun violence.

“California is a leader and one of the states with the strongest gun laws, it is remarkable that we still allow the marketing of weapons of war to our children” said

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CA 95814  
Phone: (916)  
319-2016  
Fax: (916)  
319-2116

### District Office

12677  
Alcosta  
Boulevard,  
Suite 395

Assemblymember Bauer-Kahan, "Your children, my three kids, have a right to live long, happy lives, free of gun violence."

San Ramon,  
CA 94583  
Phone: (925)  
244-1600

Gun violence has been cited as the third leading cause of death for Californian children and youth between ages 1-17. Approximately 3 million children are directly exposed to gun violence each year- at home, at school, in their communities, and social media. Exposure to gun violence has resulted in children's injuries, emotional trauma, and death.

The gun industry has targeted a younger audience through children's books, mascots, apparel, and guns adorned in cartoons and brightly colored logos to appeal specifically to children and youth.<sup>[1]</sup> Firearm companies have expanded to advertising on social media platforms to connect youth to their gun selling websites. These platforms include YouTube, Twitter, social media influencers, and streaming services that children and youth disproportionately frequent.

The last time any attempts to regulate firearm marketing was in 2014 through the unsuccessful passage of the federal Children's Firearm Marketing Safety Act. Since then, gun violence by and affecting children has skyrocketed - in 2021 alone there were approximately 259 unintentional shootings by children, resulting in 104 deaths and 168 injuries.<sup>[2]</sup>

AB 2571 will limit the type of advertising and marketing geared towards children and youth.

"Gun manufacturers are responsible for the killings that result from their marketing of guns specifically to our children- the mass shooting at Sandy Hook Elementary being one of the most egregious examples of this. Gun

manufacturers target kids with everything from children’s books about guns to special smaller weapons to make it easier for them to hold and shoot. The gun manufacturers are targeting our children to maximize profits, without any concern for the countless lives lost by children to gun violence” said Assemblymember Bauer-Kahan, “Taking away this tool of violent indoctrination from the gun industry is a vital step to ending the cycle of gun violence and protecting California’s kids.”

At the press conference, Governor Newsom noted, “I have no issue with guns or gun owners. I have serious issues with gun violence. I have serious issues with a company that thinks it’s okay to market a JR-15 modeled after a weapon of war, an AR-15 that took the lives of 20 precious first graders and six adults at Sandy Hook, and to promote it with a skull and bone and a pacifier. How the hell do they think that’s okay”? “Selling stickers, t-shirts, and hats marketing not a toy gun, but a JR-15, to start them early.”

AB 2571 now awaits assignment to committee.

[1] [starttheyoung.pdf \(vpc.org\)](https://www.vpc.org/starttheyoung.pdf).

[2] <https://www.npr.org/2021/08/31/1032725392/guns-death-children>

## Contact

**Capitol Office:** State Capitol

Sacramento, CA 95814

Tel: (916) 319-2016 | Fax: (916) 319-2116

**District Office:**

12677 Alcosta Boulevard, Suite 395

San Ramon, CA 94583

Tel: (925) 244-1600

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California State Assembly Democratic Caucus

# **EXHIBIT 31**





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**Asm Rebecca Bauer-Kahan** ✓  
@BauerKahan

Gun manufacturers are responsible for the killings that result from their marketing of guns specifically to our children. Taking away this tool of violent indoctrination from the gun industry is a vital step to ending the cycle of gun violence and protecting Ca's kids [#ab2571](#)



#### Assemblymember Bauer-Kahan Introduces Legislation to Regulate Manipulative Gun Advertisements Targeting Children

**AB 2571 restricts dangerous advertising of firearms to children and youth.**  
**Sacramento, CA** — At a press conference today in San Diego, Assemblymember Rebecca Bauer-Kahan (D-Orinda), joined Governor Gavin Newsom, Attorney General Rob Bonta and others in announcing the introduction of AB 2571. AB 2571 seeks to restrict the misleading and manipulative firearms marketing geared towards children and youth. This bill comes at a time when California has experienced a collision of two major public health crises over the past year: COVID-19 and gun violence.

"California is a leader and one of the states with the strongest gun laws, it is remarkable that we still allow the marketing of weapons of war to our children," said Assemblymember Bauer-Kahan. "Your children, my three kids, have a right to live long, happy lives, free of gun violence."

Gun violence has been cited as the third leading cause of death for Californian children and youth between ages 1-17. Approximately 3 million children are directly exposed to gun violence each year at home, at school, in their communities, and social media. Exposure to gun violence has resulted in children's injuries, emotional trauma, and death.

The gun industry has targeted a younger audience through children's books, mascots, apparel, and guns adorned in cartoons and brightly colored logos to appeal

The last time any attempts to regulate firearms marketing was in 2014 through the unsuccessful passage of the federal Children's Firearms Marketing Safety Act. Since then, gun violence by and affecting children has skyrocketed - in 2021 alone there were approximately 259 unintentional shootings by children, resulting in 194 deaths and two injuries.

AB 2571 will limit the type of advertising and marketing geared towards children and youth.

"Gun manufacturers are responsible for the killings that result from their marketing of guns specifically to our children. The mass shooting at Sandy Hook Elementary being one of the most egregious examples of this. Gun manufacturers target kids with everything from children's books about guns to special smaller weapons to make it easier for them to hold and shoot. The gun manufacturers are targeting our children to maximize profits, without any concern for the countless lives lost by children to gun violence," said Assemblymember Bauer-Kahan. "Taking away this tool of violent indoctrination from the gun industry is a vital step to ending the cycle of gun violence and protecting California's kids."

At the press conference, Governor Newsom stated, "I have no issue with guns or gun owners. I have serious issues with gun violence. I have serious issues with a company that thinks it's okay to market a .38 S&W handgun to a 10-year-old child, as AB 15 that took the lives of 20 precious first graders and six adults at Sandy Hook, and to promote it with a skull and crossbones and a pacifier. How the hell do they think that's okay? Selling stickers, t-shirts, and hats marketing not a toy gun, but a .38 S&W, so start them early."

AB 2571 now awaits assignment to committee.

11:36 AM · Feb 18, 2022 · Twitter Web App

35 Retweets 26 Quote Tweets 109 Likes



Tweet your reply

Reply

**Cat Jones** @CatLucyJones · Feb 18

Rep ying to @BauerKahan  
Thank you!

1

**Matt** @tweetingmatty · Feb 18

Rep ying to @BauerKahan  
Can you show me an example of an advertisement?

1

**Jason Armstrong** @Jasonarm92 · Feb 18

That would be a no. Notice in the press release California simultaneously has some of the toughest gun laws and spiking gun violence, proving yet again words on paper written by politicians aren't the panacea people doing evil or reckless things. Bauer-Kahan can't be this dumb.

1

**William** @Keshtath · Feb 18

Rep ying to @BauerKahan  
Violent indoctrination...

Search Twitter

### Relevant people

**Asm Rebe...** ✓  
@BauerKahan

Follow

Assemblymember to the 16th District covering parts of Contra Costa and Alameda Counties.

### What's happening

MLB · 1 hour ago

**Mets at Braves**

Trending with [#LFGM](#),  
[Charlie Morton](#)

**#SolarOpposites** 🌞

New Season streaming on Hulu.

Promoted by Solar Opposites

Trending

**Perjury**

7,147 Tweets

Trending in United States

**Jayson Tatum**

A viral photo of a supposed Michael B. Jordan wax figure has some saying that it resembles Celtics star Jayson Tatum instead.

A tribute to the Original,  
Traditional, One-Hundred-Percent, Red-Blooded,  
Two-Fisted, All-American Christmas...

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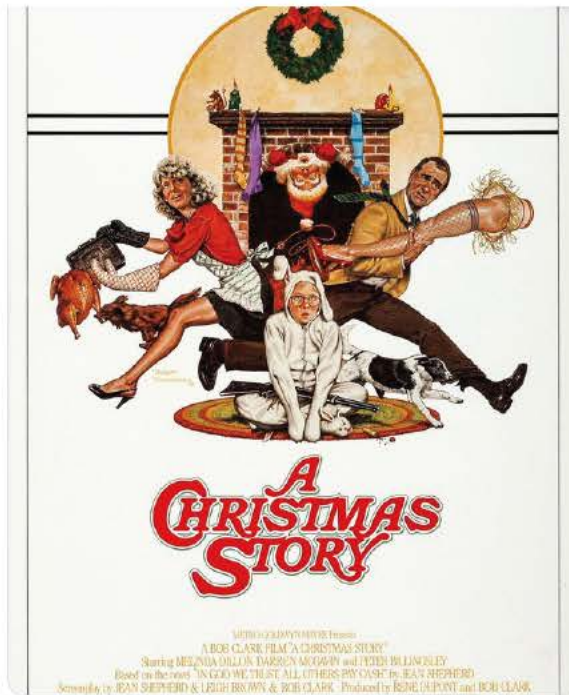
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1

**Tony Simon** @2nd4Everyone · Feb 18

Rep ying to @BauerKahan

Chi dren can t purchase guns. Nice try though.

6

**Millz** @mi\_z\_un imited · Feb 18

Rep ying to @BauerKahan

How about you fix your socioeconomic prob em that is the root cause. But what do know m not a po itician.

1

**Don Shift** @DonShift3 · Feb 18

Rep ying to @BauerKahan

Just cut to the chase and make guns i ega a ready, wou d you?

2
 1
 1

**Michael v19.3.7 (PCore: Voluntary...** @ion ... · Feb 18

guns are forever ega in the united states

1
 
 11

**Don Shift** @DonShift3 · Feb 18

was being ironic because they're trying to out aw them by the death of a thousand cuts instead of just getting to the point.

1
 
 5

**Michael v19.3.7 (PCore: Voluntary...** @ion ... · Feb 18

yaya i dig you

there s no room to be ironic here...they enjoy taking the guns ironica y too

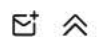
1
 
 2

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← **Tweet**



**Asm Rebecca Bauer-Kahan** ✓  
@BauerKahan

One step closer to holding gun companies accountable for targeting our children. [#AB2571](#) has passed the Assembly Judiciary Committee.

10:23 AM · Apr 26, 2022 · Twitter Web App

51 Retweets 33 Quote Tweets 223 Likes



Tweet your reply

Reply



**W@tt\$** @dunkergeist76 · Apr 26

Rep ying to @BauerKahan

When do we start holding Car companies accountable for drunk drivers? Or Politicians accountable for their lack of following The Constitution, and Bill of Rights? Heck, even enforcing the AOC who WONT pay dues.



8



**DW** @TheDrewWech · Apr 26

Rep ying to @BauerKahan

Hollywood glorifies why not go after them?

1



12



**W@tt\$** @dunkergeist76 · Apr 26

Go after Arnold and Sy who specifically have said "Guns are bad"...but every one of their damn movies have guns..go figure.



4



**Robert Boojahideen** @Rob\_Bojahideen · Apr 26

Rep ying to @BauerKahan

My favorite quote regarding unconstitutional gun control. "The Government isn't the one taking your rights away. People in the Government are taking your rights away. People who have names and addresses."



2



**Jimmy Meyer** @Gigantor68 · Apr 27

Rep ying to @BauerKahan and @gunpolicy

Awesome!! Can't wait to sue Chevy for my bad driving!!



**Pro Libertate** @Pro\_Libertate · Apr 26

Rep ying to @BauerKahan and @gunpolicy

"To preserve liberty, it is essential that the whole body of the people always possess arms, and be taught alike, especially when young, how to use them...."

Federal Farmer XV (Richard Henry Lee) January 25, 1788

1



3



13



Search Twitter

### Relevant people



**Asm Rebecca Bauer-Kahan** ✓  
@BauerKahan

Follow

Assembly member to the 16th District covering parts of Contra Costa and Alameda Counties.

### What's happening

MLB · 1 hour ago

**Mets at Braves**

Trending with [Charlie Morton](#)



**#SolarOpposites**

New Season streaming on Hulu.

Promoted by Solar Opposites

Food · Trending

**Five Guys**

2,285 Tweets

Trending

**Perjury**

7,434 Tweets

The US ... · 1 hour ago

**Good Morning America's**



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**B Chapp 22** @chamette123 · Apr 26

Amen Brother!!



2

**Spicy McHaggis** @MoeFugger76 · Apr 26

Replying to @BauerKahan

Why not focus your attention on the underlying causes of firearm deaths?



39

**Dr. Mauser** @Dr\_Mauser · Apr 26

And if you don't want to focus on suicide, then your next best bet is to go after drug gangs and other criminals.

This Tweet is from an account that no longer exists. [Learn more](#)

Show replies

**BadProcessTweeter** @SunnyShades561 · Apr 26

Replying to @BauerKahan and @gunpolicy

Hold people liable for her district and stock purchases



1

**Khyle** @thisdudekhye · Apr 26

Replying to @BauerKahan and @gunpolicy

Why hold car manufacturers responsible for people using them to cause accidents and killing people?



3

**Beer For My Horses** @ParkinJon · Apr 26

Replying to @BauerKahan and @gunpolicy

Wouldn't it be easier to simply make it illegal to sell a gun to a minor?? Oh, wait 😞



47

**Namronmada** @ADAMNAMRON · Apr 26

Replying to @BauerKahan and @gunpolicy

How about hold criminals accountable for their decisions

**Boss Chonk, Hunter of Fascists and...** @bos... · Apr 27

Replying to @BauerKahan

Gun companies are not "targeting our children" with ads.

**Silicon Strategies** @siliconstrat · Apr 26

Replying to @BauerKahan and @gunpolicy

I know a ton about marketing, and can attest that kids would not be a meaningful audience for gun makers (aside from Daisy or junior hunters).

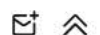
Hence, the bias is pointless.



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Tweet

## Tweet



**Asm Rebecca Bauer-Kahan** ✓  
@BauerKahan

[#AB2571](#) to protect children from gun advertising has passed Senate Judiciary! Firearm companies shamelessly market to our youngest children, while accidental shootings by children skyrocket. This must end, and will end by AB 2571 banning these reckless advertisements.

3:36 PM · Jun 14, 2022 · Twitter Web App

7 Retweets 1 Quote Tweet 17 Likes



Tweet your reply

Reply



**AmericanMitch** @american\_mitch · Jun 14

Rep ying to @BauerKahan  
Do you have examples?

At a ?

m a constituent of yours and have questions.



**Xeisenberg-XRP** @Majestic\_XRP · Jun 16

Rep ying to @BauerKahan  
It's difficult to take anyone serious when trying to legislate something they know little about...



instagram.com  
Nuance Bro (@nuancebro) · Instagram ree



## More Replies



**Superman Fan** @supermanfan19 · Jun 3

Rep ying to @BauerKahan  
So... you're protecting children from... the [#1stAmendment](#)? Please explain your funding source for the costs of the lawsuit in your future. [#CaliforniaLawyers](#)



**B Chapp 22** @chamette123 · Jun 14

Rep ying to @BauerKahan  
Bah, bah, bah. I have lived in California my whole life. Never seen a gun advertised, ever! Like ever! You are a liar and you are gaslighting to your constituents!!



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**Asm Rebecca Bauer-Kahan** ✓  
@BauerKahan

Follow

Assembly member to the 16th District covering parts of Contra Costa and Alameda Counties.

## What's happening

MLB · 1 hour ago

**Mets at Braves**

Trending with [Charlie Morton](#)



**#SolarOpposites**

New Season streaming on Hulu.

Promoted by Solar Opposites

Entertainment · Trending

**#CoryMonteith**

2,022 Tweets

Trending

**Perjury**

7,267 Tweets

**Glamour** · 2 hours ago

**Sophia Bush on Why the**



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**Asm Rebecca Bauer-Kahan** ✓  
@BauerKahan

[#AB2571](#) to end gun advertising to children has passed the Senate! Firearm companies are advertising shamelessly to our kids. Guns are the leading cause of death for children and we must end this dangerous marketing now.

9:34 PM · Jun 29, 2022 · Twitter Web App

24 Retweets 1 Quote Tweet 109 Likes



Tweet your reply

Reply



**Asm Rebecca Bauer-Kahan** ✓ @BauerKahan · Jun 29  
Rep ying to @BauerKahan  
@MomsDemand @bradybuzz @Everytown  
@GiffordsCourage @StudentsDemand



2



11



**Jen B** @jpen98 · Jun 30  
Rep ying to @BauerKahan  
Thank you @BauerKahan for your leadership on this issue!  
Together we can [#EndGunViolence!](#) [#CALeg](#)



2



**Emily A** 🙌 **Text READY to 6...** @Emi yAi... · Jun 29  
Rep ying to @BauerKahan  
Thank you @BauerKahan for your seemingly end less efforts to promote sensible gun violence prevention legislation. This @MomsDemand volunteer appreciates you 🙌🙌🙌



1



7



**Cat Jones** @CatLucyJones · Jun 29  
Rep ying to @BauerKahan  
Thank you Asm. RBK!



1



6



**Wendy Wheatcroft, MED** 🧠 @Wendy4SD · Jun 29  
Rep ying to @BauerKahan and @ChinaKatSun  
Thank you, sister!!!!



1



8



**Patricia Boe** @RestingBoeFace · Jun 29  
Rep ying to @BauerKahan  
🙌🙌🙌



1



6



**Emily** @e\_c an · Jun 29  
Rep ying to @BauerKahan

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**Asm Rebe...** ✓  
@BauerKahan

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**Mets at Braves**

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[#SolarOpposites](#)

New Season streaming on Hulu.

📺 Promoted by Solar Opposites

Trending

**Sean Hannity**

5,449 Tweets

Politics · Trending

**92% of Democrats**

People react to President Joe Biden's comment to a reporter during the White House Congressional Picnic on Tuesday that a 'poll' showed that 92% of Democrats, if it ran, would vote for me'

15.7K Tweets

**POPSUG...** ✓ · Last night

**Lily James Looks Like a Totally Different Person With Blunt Fringe and Bleached Brows**



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## Thread



**Asm Rebecca Bauer-Kahan** ✓  
@BauerKahan

Proud to have partnered with Governor Newsom to save young lives with [#AB2571](#). Guns are not toys. There is no reason a child should have a gun so they should not see predatory ads for these weapons.



**Gavin Newsom** ✓ @GavinNewsom · Ju 1  
Governor candidate, CA

This is an AR-15. A weapon of war. The gun industry is open y marketing these to K DS. With cartoons and mini JR-15s.

These don't be ong in the hands of our kids or on our streets.

just signed 2 bi s that ban ghost guns and these sick marketing p oys.



8:29 AM · Ju 1, 2022 · Twitter Web App

7 Retweets 1 Quote Tweet 40 Likes



Tweet your reply

Reply



**Asm Rebecca Bauer-Kahan** ✓ @BauerKahan · Ju 1

Rep ying to @BauerKahan  
[@MomsDemand](#)

[@bradybuzz](#)

[@Everytown](#)

[@GiffordsCourage](#)

[@StudentsDemand](#)

1



9



**Patricia Boe** @RestingBoeFace · Ju 2

Rep ying to @BauerKahan

So gratefu for your eadership on gun sense egis ation!



1

3



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**Asm Rebe...** ✓  
@BauerKahan

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**Gavin New...** ✓  
@GavinNewsom

Follow

Governor candidate, CA  
Husband to [@JenSiebe Newsom](#) and father. 40th Governor of Ca ifornia. Former Lt. Governor of Ca ifornia. Former San Francisco Mayor. Persona account.

## What's happening

MLB · 1 hour ago

**Mets at Braves**

Trending with [Charlie Morton](#)



**#SolarOpposites** 🌞

New Season streaming on Hu u.

🔖 Promoted by So ar Opposites

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**Gavin Newsom** ✓

@GavinNewsom

Governor candidate, CA

This is VILE.

A skull &amp; crossbones with a pacifier on weapon of war.

Made to look “cute” to appeal to kids.

The manufacturer calls this a “JR-15.”

Every NRA-backed politician should condemn this.



6:28 PM · Feb 16, 2022 · Twitter for iPhone

1,638 Retweets 1,249 Quote Tweets 7,496 Likes



Tweet your reply

Reply

**Firearms Policy Coalition** @gunpolicy · Feb 16

Rep'ing to @GavinNewsom

You're a vile tyrant. Leave people alone.

20

115

3,994

**Kevin Dalton** @KevinUncensored · Feb 16

Rep'ing to @GavinNewsom

This is VILE

Focus on the people literally dying on the sidewalks of California instead of a perfectly legal .22 caliber rifle you think is scary



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## Relevant people

**Gavin Newsom** ✓

@GavinNewsom

Governor candidate, CA

Follow

Husband to  
[@JenSiebe Newsom](#) and  
 father. 40th Governor of  
 California. Former Lt.  
 Governor of California.  
 Former San Francisco Mayor.  
 Persona account.

## What's happening

MLB · 1 hour ago

**Mets at Braves**Trending with #LFGM,  
[Charlie Morton](#)

#SolarOpposites 🌞

New Season streaming on Hulu.

Promoted by Solar Opposites

Trending

**Perjury**

7,229 Tweets

Trending in United States

**Jayson Tatum**

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**Gavin Newsom** ✓

@GavinNewsom

Governor candidate, CA

This is an AR-15. A weapon of war. The gun industry is openly marketing these to KIDS. With cartoons and mini JR-15s.

These don't belong in the hands of our kids or on our streets.

I just signed 2 bills that ban ghost guns and these sick marketing ploys.

From **Office of the Governor of California** ✓

7:07 AM · Ju 1, 2022 · Twitter for iPhone

2,742 Retweets 1,480 Quote Tweets 15.9K Likes



Tweet your reply

Reply

**Jeremy Knauff** ✓ @jeremyknauff · Ju 1

Rep ying to @GavinNewsom

👉 My kid knows how to handle a weapon better than you.



Search Twitter

## Relevant people

**Gavin New...** ✓

@GavinNewsom

Follow

Governor candidate, CA

Husband to

@JenSiebe Newsom and

father. 40th Governor of Ca

ifornia. Former Lt.

Governor of Ca ifornia.

Former San Francisco Mayor.

Persona account.

## What's happening

MLB · 1 hour ago

**Mets at Braves**Trending with #LFGM,  
Charlie Morton

#SolarOpposites

New Season streaming on Hu u.

Promoted by So ar Opposites

Po itics · Trending

**Jim Jordan**

141K Tweets

The US... · 2 hours ago

Good Morning America's



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# **EXHIBIT 32**



State of California – Department of Fish and Wildlife

**STUDENT CONSENT**

DFW 1043 (NEW 01/05/17)



This form must be turned in before class begins in order to participate in the class.

Note to Instructor – This form shall be retained for a period of 3 years.

1)

Provide student name and review release information

STUDENT NAME: \_\_\_\_\_

I understand there is an inherent risk in the use of firearms. I hereby RELEASE the State of California, the Department of Fish and Wildlife and all other departments, agencies, commissions, boards, institutions, officials, employees and agents of the State, from any and all liability for any and all causes of actions which I [we] may hereafter have on account of any and all injuries to the participant's person or property, including death, arising out of or related in any way to the Participant's participation in the Department of Fish and Wildlife Hunter Education Course, whether such injury results from the negligence of the State of California, the Department of Fish and Wildlife or any other departments, agencies, commissions, boards, institutions, officials, employees and agents of the State. or from any other cause.

2)

Based on the student's age, complete Box A Or Box B

**A) Student is 17 years old or younger**

I, \_\_\_\_\_, give my consent for my son/daughter, to participate in this hunter education course and give my express permission for my son/daughter to handle, manipulate and / or use firearms. **I have read this release and understand and agree to its terms.**

\_\_\_\_\_  
Signature of parent or guardian\_\_\_\_\_  
Date (mm/dd/yy)**B) Student is 18 years old or older****I have read this release and understand and agree to its terms.**\_\_\_\_\_  
Signature of student\_\_\_\_\_  
Date (mm/dd/yy)

3)

Mark appropriate box

Any person is allowed to participate in a Hunter Education course. However, certain individuals are restricted or prohibited from possessing firearms, ammunition, and/or dangerous weapons because of a court order, prior conviction, immigration status, or other reason.

☐ NOT RESTRICTED – the student named above is NOT restricted or prohibited from possessing firearms, ammunition, and/or dangerous weapons.

☐ RESTRICTED – the student named above is restricted or prohibited from possessing firearms, ammunition, and/or dangerous weapons. Speak with the instructor prior to the class.

**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *Junior Sports Magazines, Inc., et al. v. Bonta*  
Case No.: 2:22-cv-04663-CAS (JCx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**DECLARATION OF ANNA M. BARVIR IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY INJUNCTION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Kevin J. Kelly, Deputy Attorney General  
[kevin.kelly@doj.ca.gov](mailto:kevin.kelly@doj.ca.gov)  
300 South Spring Street, Suite 9012  
Los Angeles, CA 90013  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed July 20, 2022.

  
\_\_\_\_\_  
Laura Palmerin