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11 Youth Shooting Sports Association, Inc., Redlands California Youth Clay Shooting
12 Sports, Inc., California Rifle & Pistol Association, Incorporated, The CRPA
13 Foundation, and Gun Owners of California, Inc.

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21
22 IN THE UNITED STATES DISTRICT COURT

23 CENTRAL DISTRICT OF CALIFORNIA

24 JUNIOR SPORTS MAGAZINES
25 INC., RAYMOND BROWN,
26 CALIFORNIA YOUTH SHOOTING
27 SPORTS ASSOCIATION, INC.,
28 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 ALAN GOTTLIEB
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 ALAN GOTTLIEB

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2 1. I, Alan Gottlieb, am the Executive Vice President and a founder of
3 Plaintiff Second Amendment Foundation (“SAF”), a plaintiff in the above-entitled
4 action. I make this declaration of my own personal knowledge and, if called as a
5 witness, I could and would testify competently to the truth of the matters set forth
6 herein.

7 2. SAF is a 501(c)(3) nonprofit corporation under the Internal Revenue
8 Code.

9 3. SAF is incorporated in the state of Washington and headquartered in
10 Bellevue, WA.

11 4. Founded in 1974, SAF is dedicated to promoting a better
12 understanding of the country’s constitutional heritage to privately own and possess
13 firearms.

14 5. SAF has over 750,000 members and supporters nationwide, including
15 thousands in California.

16 6. SAF carries on many educational and legal action programs designed
17 to better inform the public about the gun control debate. It has been a pioneer in
18 innovative defense of the right to keep and bear arms through its publications,
19 public education programs, legal action, and events like the annual Gun Rights
20 Policy Conference.

21 7. It is critical to the success of SAF that its promotional material,
22 publications, and messages about the “right to keep and bear arms” be permitted to
23 reach a broad public audience, including minors and young adults.

24 8. Membership is open, and informational material is available to anyone
25 no matter their age or citizenship.

26 9. The SAF website provides a list of resources, ways to connect,
27 sponsorship opportunities, and news regarding the fight for the protection of the
28 rights of all gun owners.

1 10. SAF sponsors and supports an initiative called 2AGaming. This is an
2 outreach program funded by SAF with the goal of growing the Second Amendment
3 Community.

4 11. 2AGaming functions by reaching out to people who play video games,
5 especially people who play games that focus on guns. This outreach necessarily
6 includes minors and young adults who play such games.

7 12. Part of the purpose of 2AGaming is to persuade gamers, whose
8 experience with firearms may – at first – be limited to a digital experience, to seek
9 out friends and shooting clubs to obtain the necessary training and make that first
10 trip to a range for a live fire experience.

11 13. SAF hopes to educate the younger generation on safety and where
12 their gun rights come from, and also seeks to shift the political culture in the United
13 States from one that demonizes and fears guns, to an attitude of respect and
14 protection for our nation’s Second Amendment heritage.

15 14. Support and information for the 2AGaming can be found at
16 <https://www.saf.org/gaming/>. The program has received favorable press coverage
17 at [https://www.breitbart.com/politics/2020/01/30/2nd-amendment-gaming-](https://www.breitbart.com/politics/2020/01/30/2nd-amendment-gaming-spreading-gun-rights-message-via-video-games/)
18 [spreading-gun-rights-message-via-video-games/](https://www.breitbart.com/politics/2020/01/30/2nd-amendment-gaming-spreading-gun-rights-message-via-video-games/).

19 15. SAF also produces SAF-branded merchandise or “swag” that it gives
20 out to promote itself, to increase memberships, encourage participation in shooting
21 sports, and spread its Second Amendment message. The ban on merchandizing
22 codified in AB 2571 would include a ban on SAF branded t-shirts, hats, other
23 clothing, toys, games, pins, stickers, buttons, etc. that “promote” a “firearm industry
24 member.”

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

2 Executed within the United States on July 18, 2022.

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/s/ Alan Gottlieb

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Alan Gottlieb

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Declarant

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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 ALAN GOTTLIEB 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
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