

C.D. Michel-SBN 144258  
 Anna M. Barvir-SBN 268728  
 Tiffany D. Cheuvront-SBN 317144  
 MICHEL & ASSOCIATES, P.C.  
 180 East Ocean Blvd., Suite 200  
 Long Beach, CA 90802  
 Telephone: (562) 216-4444  
 Fax: (562) 216-4445  
 Email: cmichel@michellawyers.com

Attorneys for Plaintiffs 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.

Donald Kilmer-SBN 179986  
 Law Offices of Donald Kilmer, APC  
 14085 Silver Ridge Road  
 Caldwell, Idaho 83607  
 Telephone: (408) 264-8489  
 Email: Don@DKLawOffice.com

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 ALLISON  
 RANGEL 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 ALLISON RANGEL**

1  
2 1. I, Allison Rangel, am the President of Redlands California Youth Clay  
3 Shooting Sports, Inc. ("RCYCSSL"), a plaintiff in the above-entitled action. I make  
4 this declaration of my own personal knowledge and, if called as a witness, I could  
5 and would testify competently to the truth of the matters set forth herein.

6 2. RYCSSL is a 501(c)(3) nonprofit organization incorporated under the  
7 laws of the state of California and headquartered in Redlands, California.

8 3. RYCSSL is committed to growing clay shooting sports among the  
9 youth within the Southern California region. To that end, RYCSSL offers  
10 participation in youth clay shooting program, the Redlands Clay Crushers Junior  
11 Trap Team, which consists of youth shooters in ages ranging from 10 to 18 years  
12 old.

13 4. The mission of the Redlands Clay Crushers Junior Trap Team is to  
14 allow youth shooters the opportunity to safely and responsibly participate in clay  
15 shooting sports, including American Trap, Skeet, International Skeet, Olympic  
16 Bunker, and Sporting Clays. RYCSSL and the Redlands Clay Crushers Junior Trap  
17 Team consistently focus on firearm safety in a fun, yet skill-based environment.  
18 One of their principal goals is to strengthen connections within families and  
19 communities through a lifelong love of recreational shooting sports.

20 5. Through this program, RYCSSL regularly engages with minors  
21 through advertising, marketing, and other communications promoting youth  
22 competitive shooting events and practices where firearms, ammunition, and related  
23 products are lawfully possessed, handled, and used by youth.

24 6. To promote participation and attendance at such events requires that  
25 RYCSSL distribute printed and electronic communications concerning these events  
26 and programs. These communications might include images and/or written  
27 depictions of minors handling or using firearms and related products. These  
28 shooting events and programs also involve signage, discussions, branded

1 merchandise, and other communications depicting minors enjoying or otherwise  
2 encouraging minors to possess and use lawful firearms for lawful purposes.

3 7. RCYCSSL communicates with its current and prospective youth  
4 participants and their parents through its website and on social media. These  
5 mediums serve to introduce coaching staff, advertise practice schedules and  
6 registration deadlines, provide links to important shooting resources, and promote  
7 participation in youth shooting teams generally.

8 8. RCYCSSL also provides recommendations on which firearm and  
9 related products are most suitable its young shooters' competitive and recreational  
10 shooting needs.

11 9. The passage of AB 2571 has caused great concern and confusion  
12 among our youth shooters and parents, as well as our organization. Indeed,  
13 RCYCSSL is unsure what can and cannot be communicated to our current and  
14 prospective youth participants and their families as a result of AB 2571. We are  
15 thus curbing the promotion of events on our website, social media, and any  
16 communications to youth in California. We reasonably fear that any attempt by the  
17 organization to engage in these activities exposes the organization to substantial  
18 liability under AB 2571.

19 10. But for the enactment and enforcement of AB 2571, we would  
20 currently be promoting our various upcoming youth shooting events to minors in  
21 the program, encouraging new youth shooter participation, registering youth for the  
22 new season, and posting general news and information about participation in youth  
23 shooting sports.

24 11. RCYCSSL can no longer provide information on these events to youth,  
25 and this will greatly limit the participation and the ability of youth to compete. But  
26 for the implementation of AB 2571 RCYCSSL would continue to share competitive  
27 shooting opportunities and resources with youth in California.  
28

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

2 Executed within the United States on July 19, 2022.

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Allison Rangel  
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 ALLISON RANGEL 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