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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 CANON 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 CANON

1
2 1. I, Anna Canon, make this declaration of my own personal knowledge
3 and, if called as a witness, I could and would testify competently to the truth of the
4 matters set forth herein.

5 2. I am not a party to this litigation, but support Plaintiffs' Motion for
6 Preliminary Injunction and ask this Court to grant the requested relief because of
7 the direct impact that enactment and enforcement of Assembly Bill 2571 has on my
8 work with youth shooting programs.

9 3. I am currently employed as the Head Coach of the Orland High School
10 Clay Target Team and the State Director of the California State High School Clay
11 Target League.

12 4. In 2014, I began looking for activities for students that were not in
13 contact sports and discovered sporting clays. I grew up hunting and shooting with
14 firearms and wanted to share that experience with my children. Drawing upon my
15 ability to teach at the high school level, my experience in firearms and hunting, and
16 a desire to share my respect for and support of the constitutional rights we all have
17 to the next generation, I began a youth sporting clay team at Orland High School in
18 Orland, California.

19 5. I was drawn to the shooting sports because of the ability of all to
20 participate. Currently, we have a student with spina bifida participating on the
21 Orland High School Clay Target Team. The shooting sports provide him with the
22 ability to compete at the high school level just like his brothers and friends.

23 6. That first year, the team included five students including my sons who
24 had already completed the state course on hunter's safety from the California
25 Department of Fish and Game. But my small starter team grew and eventually
26 joined the California Youth Shooting Sports Association (CYSSA), competing
27 against youth their own ages at numerous ranges in northern and central California.

28 7. In about 2018, I worked with the USA High School Clay Target

1 League to form the California State High School Clay Target League. We had 36
2 students join that first year from two different schools. Currently, we have 354
3 youth athletes in three disciplines with two seasons shooting trap, sporting clays,
4 and skeet.

5 8. AB 2571 is, however, making it impossible for the California High
6 School Clay Target League to continue its mission to promote the shooting sports
7 amongst California high schoolers. In fact, the law prompted the organization to
8 halt the promotion of events and recruitment of youth to participate in the next
9 season because such communications necessarily involve the promotion of the use
10 of firearms and related products directly to teens.

11 9. I can no longer promote the work of the California State High School
12 Clay Target League, our student successes, solicit sponsorships that would promote
13 firearm-related products to youth in the program, or adequately train the team. I
14 reasonably fear that any attempt by the organization to engage in these activities
15 exposes the organization to substantial liability under AB 2571.

16 10. The entire California State High School Clay Target League is “down”
17 until this Court issues an injunction enjoining the enforcement of the law so that we
18 may resume our work with youth or until we can determine whether there is any
19 way at all to continue our important work notwithstanding the enforcement of AB
20 2571, something that appears highly unlikely.

21 11. Because of the importance of safety, all of my youth shooters are
22 required to attend California’s Hunter’s Safety courses, which equip them with the
23 knowledge necessary as a hunter for their entire lives. AB 2571 is, however,
24 extinguishing many vital opportunities for my youth shooters to take these courses.
25 Indeed, many course have been canceled because the trainers and facilities that host
26 these events fear that they cannot train anyone under the age of 18 years.

27 12. AB 2571 is damaging youth shooting sports for many California
28 students who have used participation in the shooting sports as an instrument to

1 improve their grades, as a break from dealing with tough issues of being a kid, and
2 as a steppingstone to go on to college shooting teams.

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

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

5 

6 Anna Canon
7 Declarant

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 CANON 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