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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 JAY  
 FITZGERALD 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 JAY FITZGERALD**

1  
2 1. I, Jay Fitzgerald, 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 me and my daughter and our enjoyment of the shooting sports.

9 3. I am the father of a junior youth competitive shooter who is a four-  
10 time Skeet All American, a three-time Junior World Champion, and a four-time  
11 California State Lady Champ in shooting. She is also a minor under the age of 18,  
12 residing in California.

13 4. Since the passage of AB 2571, because my daughter is a minor living  
14 in California, she has been cut off from some of the national youth shooting groups.

15 5. For instance, she can no longer receive emails from National Shooting  
16 Sports Association, a leading organization in her chosen area of sport, that would  
17 otherwise alert her to events and registration information for upcoming  
18 competitions.

19 6. My daughter is unable to contact USA Shooting, and they are unable  
20 to reach out to my daughter, because of her age and the reasonable fear that if they  
21 do advertise, market, or otherwise communicate with her (and other minors in  
22 California) the organization will expose itself to substantial civil liability under AB  
23 2571.

24 7. My daughter has also been unable to log into sites to see future  
25 tournaments and standings of the shooters as they compete.

26 8. All publications have stopped coming to my daughter, and coaches are  
27 cancelling training clinics that she would usually attend. We are unsure if we fly  
28 our daughter out of state to train whether the coaches would be in violation of the

1 law because our daughter is a resident of California.

2 9. Communications that we had with recruiting colleges have stopped  
3 because they are unable to communicate with youth in California regarding their  
4 shooting teams and opportunities because of her age and the reasonable fear that if  
5 they do advertise, market, or otherwise communicate with her (and other minors in  
6 California) they will expose themselves to substantial civil liability under AB 2571.

7 10. AB 2571 effectively destroys my daughter's training, opportunities to  
8 compete at the Olympic and World levels and has shut down her communications  
9 with national groups and recruiters.

10  
11 I declare under penalty of perjury that the foregoing is true and correct.  
12 Executed within the United States on July 19, 2022.

13  
14   
15 Jay Fitzgerald  
16 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 JAY FITZGERALD 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