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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 SAM PAREDES 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 SAM PAREDES

1
2 1. I, Sam Paredes, am the Executive Director of Gun Owners of
3 California, Inc. ("GOC"), a plaintiff in the above-entitled action. I make this
4 declaration of my own personal knowledge and, if called as a witness, I could and
5 would testify competently to the truth of the matters set forth herein.

6 2. GOC is recognized as a 501(c)(4) non-profit mutual benefit
7 corporation under the Internal Revenue Code and a recognized non-profit
8 membership corporation under the state of California. GOC is incorporated in the
9 state of California and is currently headquartered in El Dorado Hills, California.

10 3. GOC is dedicated to the preservation and restoration of the Second
11 Amendment in California. It was formed for the express purpose of promoting,
12 encouraging, and advocating for the purchase, use, and ownership of firearms and
13 related products. GOC opposes legislation that it deems harmful to the right to keep
14 and bear arms, while fighting to protect the Second Amendment rights of all
15 Californians at the capitol, in the courts, and through elections. GOC strongly
16 believes that the rights enshrined in the Second Amendment guarantees those
17 enshrined by the First Amendment.

18 4. In service of its mission, GOC annually supports youth shooting teams
19 by raising contributing financial resources to their programs and has sponsored
20 individual talented young shooters through their careers as juniors looking to earn
21 scholarships at major universities. Through this work, Plaintiff GOC regularly
22 engages with minors through advertisements, sponsorships, and other
23 communications promoting events where "firearm-related products" are used.

24 5. GOC also engages in pure political speech concerning the exercise of
25 the constitutional right to own, possess, and use firearms for lawful purposes,
26 including speech about firearm use and safety, hunting, and the shooting sports.

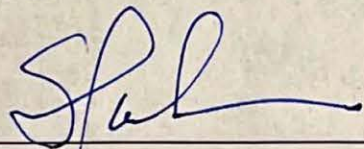
27 6. The passage of AB 2571 has caused great concern within our
28 organization. Indeed, the enactment and enforcement of AB 2571 restricts GOC's

1 ability to engage in speech concerning firearms and related products (including the
2 promotion of its youth scholarship programs for young competitive shooters)
3 directly with minors or in ways that are designed, intended, or reasonably appear to
4 be attractive to minors. This means that GOC must halt or drastically limit the
5 distribution of advertisements, mentions, recruitment information, and other content
6 so that those under 18 years of age are not likely to receive it. Otherwise, I
7 reasonably believe that the organization will be subject to substantial liability under
8 AB 2571 for engaging in such activities.

9 7. The passage of AB 2571 has also caused great confusion within the
10 organization over what speech is allowed or not allowed under the law. This
11 confusion chills the speech of GOC and its thousands of members across the state
12 because we are unsure what can be said without fear of violating the law and being
13 subject to substantial liability.

14 8. But for the enactment and enforcement of AB 2571, GOC would
15 continue to engage in speech concerning firearms and related products, including
16 the promotion of its youth scholarship programs for young competitive shooters, as
17 well as its political speech about the rights to keep and bear arms for lawful
18 purposes, including hunting and the shooting sports.

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

22
23
24 
25 Sam Paredes
26 Declarant
27
28

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 SAM PAREDES 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