

1 C.D. Michel-SBN 144258
2 Anna M. Barvir-SBN 268728
3 Tiffany D. Cheuvront-SBN 317144
4 MICHEL & ASSOCIATES, P.C.
5 180 East Ocean Blvd., Suite 200
6 Long Beach, CA 90802
7 Telephone: (562) 216-4444
8 Fax: (562) 216-4445
9 Email: cmichel@michellawyers.com

10 Attorneys for Plaintiffs Junior Sports Magazines Inc., Raymond Brown, California
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.

14 Donald Kilmer-SBN 179986
15 Law Offices of Donald Kilmer, APC
16 14085 Silver Ridge Road
17 Caldwell, Idaho 83607
18 Telephone: (408) 264-8489
19 Email: Don@DKLawOffice.com

20 Attorney for Plaintiff Second Amendment Foundation

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 STEVE GOMEZ
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 STEVE GOMEZ

1
2 1. I, Steve Gomez, am the President of The CRPA Foundation (CRPAF),
3 a plaintiff in the above-entitled action. I make this declaration of my own personal
4 knowledge and, if called as a witness, I could and would testify competently to the
5 truth of the matters set forth herein.

6 2. CRPAF is a 501(c)(3) non-profit organization incorporated under the
7 laws of the state of California, with headquarters in Fullerton, California.

8 3. CRPAF was formed for the purpose of promoting and advocating for
9 the lawful purchase, use, and ownership of firearms and related products. CRPAF
10 defends the rights of all gun owners and users, including youth, to use, own, train,
11 and speak about firearms and their association with the gun culture.

12 4. Since 2004, CRPAF has raised funds to benefit eligible programs
13 supportive of advancing its mission and ensuring the continued fight to protect the
14 Second Amendment rights of all law-abiding citizens in California who to choose to
15 own a gun for sport, hunting, and personal protection. Grants from CRPAF benefit a
16 variety of constituencies throughout California, including youth, women, gun
17 collectors, hunters, target shooters, law enforcement, adaptive shooters, and those
18 who choose to own a gun to defend themselves and their families.

19 5. CRPAF is dedicated to fostering youth leadership skills through
20 programs that engage kids, teenagers, and young adults in wildlife conservation,
21 hunting heritage and traditions, and competitive and recreational shooting sports.

22 6. Through its Youth Scholarship Program, CRPAF supports college-
23 bound students that believe in the preservation of the Second Amendment and
24 conservation of wildlife in California. These students serve as ambassadors for the
25 shooting sports, hunting, and the Second Amendment as they share their viewpoints
26 with the next generation. A true and correct copy of the CRPAF webpage
27 highlighting the California Youth Ambassadors Program is attached hereto as
28 **Exhibit 21.**

1 7. CRPAF supports, promotes, sponsors, or participates in youth
2 recreational events specifically for youth or where youth are extremely likely to be
3 in attendance and where youth lawfully use, handle, observe, or otherwise possess
4 firearms, ammunition, and related products.

5 8. CRPAF also creates and distributes a wide variety of informational
6 bulletins and brochures that are distributed throughout the state, as well as
7 informative research and articles concerning all manner of firearm-related issues.
8 All of these publications are meant to bring awareness to issues, laws, and general
9 information that gun owners and shooters of all ages should be aware of in a state
10 that is historically unfriendly towards the Second Amendment.

11 9. Further, in response to countless requests from CRPA and CRPAF
12 supporters for such content, CRPAF has been working to create, publish, and
13 distribute an activity book specifically for younger children to teach them about gun
14 safety and their constitutional rights, including the Second Amendment.

15 10. Because of the enactment and enforcement of AB 2571, CRPAF has
16 had to pull some of its publications, "clean" the CRPAF webpage, and will be
17 unable to promote our kid-friendly activity book. If we continue these activities
18 unabated, I reasonably believe that the organization will be subject to substantial
19 liability under AB 2571.

20 11. But for the enactment and enforcement AB 2571, CRPAF would
21 continue to offer this and other dynamic content concerning and promoting the
22 possession and use of firearms throughout California regardless of the age of the
23 participant, as is our First Amendment right.

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

26
27 

28 Steve Gomez
Declarant

EXHIBIT 21

CALIFORNIA YOUTH AMBASSADORS

Congratulations to our scholarship winners! A special thanks to [generous donors and supporters](#) of the CRPA Foundation that make this Scholarship Program possible.



2022



Sophia-Liesl Klages, Texas A&M University – \$1000 Wildlife Conservation Scholarship



Carly Moran, Hillsdale College – \$1000 Shooting Sports Scholarship

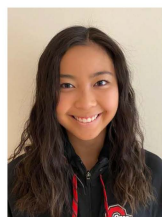


Sarah Mard, Vanderbilt University – \$1000 Shooting Sports Scholarship



Hays Turner, High Point University – \$1000 Wildlife Conservation Scholarship

2021



Natalie Katsuyama, The Ohio State University – \$1000 Shooting Sports Scholarship



Martin McKenna, Cal State Fresno – \$1000 Wildlife Conservation Scholarship

- Anthony Bertelsen, Boise State – \$500 Shooting Sports Scholarship
- Ethan Johnson, Cal State San Marcos – \$500 Shooting Sports Scholarship
- Jocelynn Rodriguez, Clovis Community College – \$500 Wildlife Conservation Scholarship
- Pearl Smith, Vanguard University – \$500 Special Scholarship Written Essay
- Katelyn Lowry, Cal Poly, San Luis Obispo – \$250 Shooting Sports Scholarship
- Hunter Seymore, Texas Tech – \$250 Shooting Sports Scholarship

Additional Resources

- [CRPA Foundation Scholarship Program](#)



California Rifle & Pistol Association
Headquarters & Training Center

271 E. Imperial Highway,
Suite 620
Fullerton, California 92835

P: (714) 992-2772
800-305-2772
E: contact@crpa.org

8am to 4:30pm, Monday to Friday

DONATE NOW

Support Your Second Amendment Rights

The California Rifle & Pistol Association, founded in 1875, provides training in the safe, responsible, and enjoyable use of firearms; sanctions competitive shooting state championships; and fights for the constitutional right to keep and bear arms for those who choose to own a gun in California for sport, hunting, or self-defense.

SUBSCRIBE

E-news Subscription

Follow the latest news, events and activities of the California Rifle & Pistol Association by signing up for our e-news! All subscribers will receive exclusive alerts and invitations to events through out California.

CRPA VOLUNTEERS



Volunteer

Looking for a way for you and your family to get engaged in protecting the Second Amendment? We have all kinds of opportunities for serving and learning more about what we do.



CRPA FOUNDATION SCHOLARSHIP PROGRAM

We know that the future and well-being of the Second Amendment depends on ensuring that tomorrow's leaders are invested in.

The CRPA Foundation (CRPAF) Scholarship Program supports current and incoming college students that believe in the preservation of the Second Amendment, and conservation of wildlife in California. CRPAF seeks to foster growth of pro-2A communities on college campuses and is committed to supporting pro-2A students who carry a passion in all that they do. If you have a passion for the Second Amendment, hunting and conservation, or just simply love to shoot, apply for a CRPAF Scholarship today! Current and incoming college students that demonstrate financial need may apply for any open scholarship.

The deadline to apply is March 31.



Fletcher Diehl Memorial Wildlife Conservation Scholarship – \$1,000

The Fletcher Diehl Memorial Wildlife Conservation Scholarship – named after Fletcher Diehl, CRPA member and conservationist– is dedicated to service-oriented student leaders who are active in the community and in the mission to preserve California wildlife.

Shooting Sports Scholarship – \$1,000

The Shooting Sports Scholarship is dedicated to service-oriented student leaders who demonstrate passionate engagement in the shooting sport community.

APPLY TODAY!

Applying for a Scholarship

To be considered for a CRPA Foundation Scholarship, please include the following material at the time of application:

- Copy of Acceptance Letter from chosen college,
- Most Recent Unofficial Transcript,
- Completed Scholarship Application,
- and Typed Essay (500-750 word count).

Mail all materials to:

CRPA Foundation Scholarship Program
271 E. Imperial Hwy, Ste. 620 Fullerton, CA
92835, or email your application to
contact@crpa.org.

FLETCHER DIEHL

Fletcher was born on December 9, 1937 in San Diego, California. Fletcher grew up in the area and spent time learning from his father who owned and operated a propeller shop near where Petco Park is located today. Fletcher graduated from San Diego High School and was a San Diego State alumni and one of their best fans. His father used to hand out Sees' lollypops at all the home football games, to the entire section. He loved all sports and played for his high school football team.

He started hunting early in his life but didn't get into predator hunting until he met the likes of Gene Cobb and Jack Bransford. Jack has fond memories of mentoring Fletcher in the art of predator calling. After a few rocky starts, and a few funny stories for later, he took to the art to become a master caller. Fletcher even ended up judging the Western Predator Calling Championship. He has recorded distress calls for at least one manufacturer and has represented E.L.K.S Inc. and Buck Knives.

Fletcher became a Hunter Education Instructor in 1966 and continued his passion for teaching up to the very end. Mentoring hundreds of Game Wardens, Instructors and youth became a passion for almost sixty years. He took student instructors and volunteered thousands of hours to them teaching to help instructors provide quality instruction and increase a deep understanding of conservation and hunter safety.

Corporate giants such as Buck Knives were heavily influenced by the work of Fletcher and soon they became training sites where he would replicate himself into budding new instructors while teaching new hunters their first skill sets. CJ Buck of Buck Knives was a fond friend of Fletcher's. Fletcher taught Hunter Education for California at the Buck Knives factory in Santee for many years. The Buck family let Fletcher use the cafeteria as a school room. Students had the opportunity to shop in the attached store during our breaks. Even I still have about 15 buck knives or more in my house. CJ Buck, after taking the reins of the company, also would sponsor Fletcher into numerous SHOT Shows. Fletcher in return, talked to many hunting shops during his travels and drummed up business for the company.

Fletcher married Marion Wickens-Diehl since July 14, 1971. Marion was a wonderfully tough, but gentle woman who was suffering from a terrible disease, Scleroderma. With Marion having the disease, it led Fletcher to joining the Greater San Diego Chapter of the Scleroderma Foundation, later he and Marion become active board members and Fletcher served as the Chapter President. Marion was living with the disease, but unfortunately had an incident where she fell and hit the ground so hard, she preceded Fletcher on May 6, 2011. Fletcher, to his last days, helped folks from all over the United States deal with the terrible disease.

Fletcher spent time encouraging sound conservation principles among the general public and worked to inform politicians on the subject matter. He was a champion of the Second Amendment and our shooting and hunting rights. Fletcher was a lifetime member of the CRPA. While never listed as a recruiter, Fletcher often would get interested shooters and hunters to join the CRPA and he was a contributing writer for the Associations "Firing Line Magazine".

Fletcher retired from San Diego Gas and Electric after many years and he never forgot a customer, or where they lived. Fletcher continued his work until coming down with Covid Pneumonia during the pandemic and passed on 3 February 2022 at the age of 84 leaving a conservation legacy that spanned the vast majority of his life serving the public and wildlife for future generations.

DOWNLOAD THE APPLICATION TODAY!

Scholarship Recipients



California Rifle & Pistol Association
Headquarters & Training Center

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Fullerton, California 92835

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800-305-2772
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CRPA VOLUNTEERS

Volunteer

Looking for a way for you and your family to get engaged in protecting the Second Amendment? We have all kinds of opportunities for serving and learning more about what we do.



The CPRA Foundation (CPRAF) awards grants annually to promote the above aspects of the Second Amendment. The CPRAF focuses its support on preserving public access to hunting and wildlife conservation, firearm safety, firearm and shooting education, educational publications and media, and organizations that further engagement, outreach, and interpretation of the public in the shooting sports.

The CPRAF Foundation Grant program is made possible through the fundraising efforts of its volunteer donor program and generous donors and sponsors. CPRAF are always in need of:

- Personal firearms and hunting safety.
- Enhance the membership skills of those participating in shooting sports.
- Educate the general public with respect to firearm in their historic, technological, artistic, constitutional contributions to the general well-being of the public at large.
- Identify and create circumstances including youth, women, disabled shooters, gun collectors, law enforcement officers, hunters, and competitive teams.
- Promote, educate, and present the findings enumerated under the Second Amendment of the United States Constitution.

BE SAFE. SHOOT STRAIGHT. FIGHT BACK!

CRPA
OF CALIFORNIA

CRIPASUPPORTS.COM

Application Process Guidelines

The CRPA Foundation provides financial support to eligible projects, programs, and organizations through its grant program.

The general focus of CRPA Foundation grants are to:

- Promote firearm and hunting education, training, and safety.
- Enhance the marksmanship skills of those participating in the shooting sports.
- Educate the public with respect to firearms in their historic, technological, artistic, constitutional contribution to the general well-being of the public at large.
- Provide a variety of constituencies including youth, women, adaptive shooters, gun collectors, law enforcement officers, hunters, and competitive shooting teams.
- Promote, educate, and protect the rights enumerated under the Second Amendment of the United States Constitution.

Eligible Applicants:

Eligible organizations or groups may apply for a CRPA Foundation (CRPAF) grant for a qualifying project or program. Eligibility is determined solely by the CRPA Foundation. Applicants shall not discriminate against any member, person, or other user of its facilities or equipment based on age, race, religion, sex, or national origin. Applicants are not required to have association with the CRPA Foundation to receive funds under this grant program. Eligible applicants as defined by the CRPA Foundation Board of Trustees:

- IRS 501 (c) recognized entity (must submit IRS Determination Letter with application).
- Any organization, association, or other entity with a unique federal employer identification number (EIN) issued by the IRS (must submit a signed copy of the IRS 2-9 form disclosing this number).
- State recognized nonprofit organization (must submit copy of state nonprofit registration).

1

Grant requests must support, foster, and further purposes of the CRPA Foundation Articles of Incorporation and Mission Statement. These purposes are as follows:

Applications must be received by email at contact@crpa.org prior to the deadline for consideration.

1. Download and review the [CRPA Foundation Grant application](#) and [CRPA Foundation Application checklist](#).
2. Complete the application and submit by email to contact@crpa.org with all required documentation.
3. Please carefully review the list of required documentation:

IRS 501 (c)(3) recognized entity must include a copy of the 501(c)(3) IRS Determination Letter.
State recognized nonprofit organizations must include a copy of its state nonprofit registration.

Any organization, association or other entity requesting a grant that has a unique federal employer identification number must include a signed copy of the IRS 34-6 form: [discussing this number](#).

June 1st, October 1st

Final Reports must be submitted by email to contact@crpa.org and the green coordinator assisting on your application within 90 days of the end of the grant period detailing:

- Such reports shall include but are not limited to:

Such reports shall include but are not limited to:

- For any portion of a grant award made by check, copies of receipts and paid invoices for items purchased with grant funds must be included.

The Application Process

The Application Process

What is the average amount awarded to mentees? The average grant award from the CFSFA Foundation is valued at just over \$2,000.

Is this the only grant program through the CIPA Foundation?
Yes.

How do I detail my requested items in the application, or how do I create my grant request list?
Applicants must provide a detailed grant request list on an excel spreadsheet that must include all items sought through the CIPA Foundation Grant Program request. Once this list is created, attach it to the application.

Does my organization:

My organization is a _____ . Possibly if you are not a 501(c)(3) and the only users are your members, you are probably not eligible. However, if you are a private membership-only club, _____ membership club that also provides access to qualified groups (government or 501(c)(3) affiliate) or provides qualified charitable activities, Am I eligible to apply? you may be eligible for funding. To be considered for funding, you would have to provide proof of substantial public benefit.

Yes, however, the process differs depending on the specific organization. Your Board/ Council may apply directly to the CPUSA Foundation. Application for any individual Venture Group, Naval County Unit, or Boy Scout Troop must be submitted by an organization that takes on the role of its fiscal sponsor for that group. This organization must also meet the CPUSA Foundation's grant eligibility requirements to receive funding. In these instances, the fiscal sponsor is responsible for administering the grant and ensuring the grant award is utilized as stated in the application, as well as for all reporting requirements under the grant. Before applying, the fiscal sponsor should be advised of any restrictions that the parent organization has imposed on your proposed grant, including restrictions related to any equipment or other items you may request from the CPUSA Foundation.

Are there any reporting requirements at the conclusion of my project or program?	Yes. Grantees must provide a final report to the CDFR Foundation due within 90 days of the end of the grant period. See the Final Report Requirements section above for details.
My organization has not yet filed a final report from last year.	Yes. An application may be submitted for consideration. However, all outstanding final report requirements must be completed before any new awards will be made.
How do I apply for funding for the current cycle?	Please refer to the Final Report Requirements section above.
May I complete my final report?	

For questions, please email contact@crps.org.

California Rifle & Pistol Association © 11/15/2022

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 STEVE GOMEZ 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