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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)

**SUPPLEMENTAL DECLARATION OF
ALAN GOTTLIEB IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Hearing Date: October 17, 2022
Hearing Time: 10:00 a.m.
Courtroom: 8D
Judge: Christina A. Snyder

SUPPLEMENTAL DECLARATION OF ALAN GOTTLIEB

1
2 1. I, Alan Gottlieb, am the Executive Vice President and a founder of
3 Plaintiff Second Amendment Foundation (“SAF”), a plaintiff in the above-entitled
4 action. I make this declaration of my own personal knowledge and, if called as a
5 witness, I could and would testify competently to the truth of the matters set forth
6 herein.

7 2. AB 2571, as adopted on June 30, 2022, and as currently enforced bars
8 SAF from publishing and distributing any communications that may promote the
9 use of firearm-related products directly to minors or in ways that are likely to be
10 attractive to them. This prohibits SAF from actively advertising to and recruiting
11 youth members into the organization, publishing Second Amendment materials
12 depicting youth engaged in activities where they are using firearm-related products,
13 promoting recreational and competitive shooting events that may be sponsored by
14 SAF, and otherwise promoting youth shooting activities in California. It also
15 restricts SAF’s 2AGaming initiative, which seeks to grow the Second Amendment
16 community by reaching out to people who play video games, especially minors and
17 young adults who play games that focus on guns.

18 3. To prevent substantial civil liability under the new law, SAF has been
19 forced to stop these communications to anyone under the age of 18 in California,
20 thus limiting lawful speech to many young Californians who desire to learn more
21 about live fire experience and membership in SAF. But for the adoption and
22 enforcement of AB 2571, SAF would continue to sponsor these outreach
23 communications to people of all ages as it has done for years. And if the law is
24 enjoined, SAF will in fact resume these activities.

25 4. AB 2571, as passed on June 30, 2022, and currently enforced, bars
26 SAF from distributing SAF-branded merchandise and giveaways (or “swag”),
27 including but not limited to t-shirts, hats, other clothing, toys, games, pins, stickers,
28 buttons, to promote the organization and solicit memberships and/or financial

1 support, as well as to spread pro-gun messages and slogans.

2 5. But for the adoption and enforcement of AB 2571, SAF would
3 continue distributing SAF-branded merchandise and giveaways (or “swag”),
4 including but not limited to t-shirts, hats, other clothing, toys, games, pins, stickers,
5 buttons, to promote the organization and solicit memberships and/or financial
6 support, as well as to spread pro-gun messages and slogans. And if the law is
7 enjoined, CRPA would in fact resume engaging in these activities.

8 6. Even if AB 160 goes into effect, and some limited exemptions are
9 made to California’s ban on firearm-related speech, the AB 160 amendments to AB
10 271 do very little to address the vagueness and overbreadth concerns that plaintiffs
11 identified in their complaint and moving papers. In fact, by adding *even more*
12 unclear language rather than taking it away, the amendments make the law in many
13 ways *more vague and more overbroad*. We thus remain unsure exactly what speech
14 is prohibited or permitted going forward. That confusion chills SAF’s speech.

15 I declare under penalty of perjury that the foregoing is true and correct.
16 Executed within the United States on September 28, 2022.

17 /s/ Alan Gottlieb
18 Alan Gottlieb
19 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:

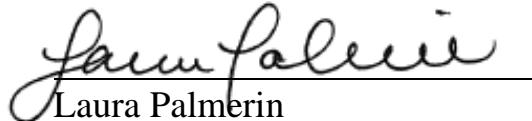
**SUPPLEMENTAL DECLARATION OF ALAN GOTTLIEB IN SUPPORT
OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

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 September 28, 2022.


Laura Palmerin