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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
RAYMOND BROWN 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 RAYMOND BROWN

1 1. I, Raymond Brown, am a plaintiff in the above-entitled action and
2 make this declaration of my own personal knowledge and, if called as a witness, I
3 could and would testify competently to the truth of the matters set forth herein.

4 2. AB 2571, as adopted on June 30, 2022, and as currently enforced bars
5 me from actively coaching youth in the shooting sports in California because,
6 during my training and coaching sessions with young shooters, minors lawfully use,
7 handle, observe, and otherwise possess firearm-related products. Depending on the
8 student's needs, I might also engage in discussions with or provide
9 recommendations to youth shooters concerning firearm-related products that are
10 most suitable for young and/or beginner shooters. These activities necessarily
11 involve advertising, marketing, or arranging for the placement of communications
12 promoting the use of firearm-related products—*directly to minors* and in ways
13 likely to be attractive to minors.

14 3. To prevent substantial liability under the new law, I have stopped
15 offering courses in California specifically for youth and have barred youth under 18
16 from participating my general classes. I have also been forced to remove all
17 mention of youth shooting from my website for fear of violating AB 2571.


18 4. But for the adoption and enforcement of AB 2571, I would continue to
19 coach youth in shooting and hunting and would continue to suggest firearm-related
20 products to my minor students throughout California. I would also continue making
21 mention of youth shooting on my website. If the law is enjoined, I would in fact
22 immediate resume these activities.

23 5. Even if AB 160 goes into effect, and some limited exemptions are
24 made to California's ban on firearm-related speech that would allow me to offer or
25 promote firearm training and hunting courses, the amended law expressly exempts
26 only speech that offers or promotes these programs, it does not exempt the speech
27 that takes place during those programs. As such, if I choose to resume offering such
28 that takes place during those programs. As such, if I choose to resume offering such

1 courses to youth under 18 after the AB 160 amendments take effect, I must still
2 carefully censor my speech since such courses inherently include speech promoting
3 firearm-related products, including recommendations about specific products.
4 Because of the enactment and enforcement of AB 2571 (even as amended by AB
5 160), I no longer feel comfortable speaking to youth about what equipment,
6 firearms, and ammunition they should use for their sport or recreational shooting.
7 All equipment I promote to youth would be “attractive to minors” because those
8 particular minors are involved in a sport where they use firearms and firearm-
9 related equipment. It is natural that I would tell them about the best products to use
10 just like any other coach in other sports would tell their youth about.

11 6. But for the adoption and enforcement of AB 2571 (and the AB 160
12 amendments), I would continue to coach youth in shooting and hunting and would
13 continue to suggest firearm-related products to my minor students throughout
14 California. I would also continue making mention of youth shooting on my website.
15 If the law is enjoined, I would in fact immediately resume these activities.

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

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19 
20 Raymond Brown
21 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 RAYMOND BROWN 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.

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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