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12 Sports, Inc., California Rifle & Pistol Association, Incorporated, The CRPA  
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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  
SAM PAREDES 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

1                                   **SUPPLEMENTAL DECLARATION OF SAM PAREDES**

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.     AB 2571, as passed on June 30, 2022, and currently enforced, bars  
7 GOC from supporting youth shooting teams by raising and contributing financial  
8 resources to their programs and sponsoring individual young shooters through their  
9 careers as juniors looking to earn scholarships at major universities. Because these  
10 activities require GOC to encourage minors to use firearm-related products, these  
11 activities necessarily involves advertising, marketing, or arranging for the  
12 placement of communications promoting the use of firearm-related products—  
13 *directly to minors* and in ways likely to be attractive to them. To prevent substantial  
14 civil liability under the new law, GOC has withdrawn this important support of  
15 youth shooting teams.

16           3.     But for the adoption and enforcement of AB 2571, GOC would  
17 continue to sponsor and support youth shooting teams, offer scholarship programs  
18 to youth shooters, and communicate with minors as it has done for years. And if the  
19 law is enjoined, GOC will in fact resume these activities.

20           4.     AB 2571, as passed on June 30, 2022, and currently enforced, also  
21 restricts GOC’s ability to engage in pro-gun speech concerning the use of firearm-  
22 related products directly with minors or in ways that are designed, intended, or  
23 reasonably appear to be attractive to them. To prevent substantial civil liability  
24 under the new law, GOC has had to halt or drastically limit the distribution of  
25 advertisements, mentions, recruitment information, and other content so that those  
26 under 18 years of age are not likely to receive it.

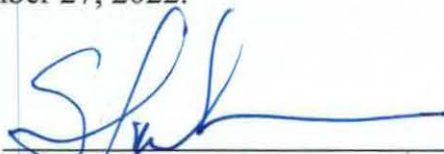
27           5.     But for the adoption and enforcement of AB 2571, GOC would  
28 continue to engage in pro-gun speech concerning the use of firearm-related



1 products directly with minors or in ways that are designed, intended, or reasonably  
2 appear to be attractive to them. And if the law is enjoined, GOC will in fact resume  
3 these activities.

4 6. What's more, the AB 160 amendments to AB 271 do very little to  
5 address the vagueness and overbreadth concerns that plaintiffs identified in their  
6 complaint and moving papers. In fact, by adding *even more* unclear language rather  
7 than taking it away, the amendments make the law in many ways *more vague and*  
8 *more overbroad*. We thus remain unsure exactly what speech is prohibited or  
9 permitted going forward, and each time we attempt to engage the public, we have to  
10 weigh the risks of speaking to and about youth shooting programs and activities  
11 against the very real and very substantial risk of civil liability. This chills the speech  
12 of GOC and its thousands of members across the state because we are unsure what  
13 can be said without fear of violating the law and being subject to substantial  
14 liability.

15 I declare under penalty of perjury that the foregoing is true and correct.  
16 Executed within the United States on September 27, 2022.

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21 Sam Paredes  
22 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:

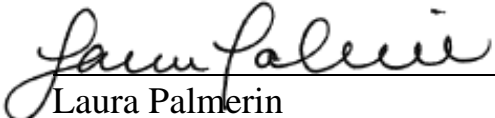
**SUPPLEMENTAL DECLARATION OF SAM PAREDES IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

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](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 September 28, 2022.

  
\_\_\_\_\_  
Laura Palmerin