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8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF CALIFORNIA

11
12 **THE UNITED STATES SPORTSMEN’S**
ALLIANCE FOUNDATION, et al.,
13
14 Plaintiffs,
15
16 **v.**
17 **ROB BONTA, in his official capacity as**
Attorney General of the State of California,
et al.,
18
19 Defendants.

2:22-cv-01395-DAD-JDP

**ANSWER TO FIRST AMENDED
COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

Courtroom: 4
Judge: Hon. Dale A. Drozd
Trial Date: None set
Action Filed: August 5, 2022

20
21 Defendant Attorney General Rob Bonta, in his official capacity, hereby responds to
22 Plaintiffs’ First Amended Complaint for Declaratory and Injunctive Relief (FAC) as follows.

23 **ANSWER TO INTRODUCTION**

24 1. Paragraph 1 of the FAC consists of legal argument and/or conclusions that do not
25 require admission or denial. With respect to any citation or quotation of a legal authority, that
26 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
27 allegations.
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1 2. Paragraph 2 and footnote 1 of the FAC consist of legal argument and/or conclusions
2 that do not require admission or denial. With respect to any citation or quotation of a legal
3 authority, that authority speaks for itself. To the extent admission or denial is required,
4 Defendant denies all allegations.

5 3. Paragraph 3 of the FAC consists of legal argument and/or conclusions that do not
6 require admission or denial. With respect to any citation or quotation of a legal authority, that
7 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
8 allegations.

9 4. Paragraph 4 of the FAC consists of legal argument and/or conclusions that do not
10 require admission or denial. With respect to any citation or quotation of a legal authority, that
11 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
12 allegations.

13 5. Paragraph 5 of the FAC consists of legal argument and/or conclusions that do not
14 require admission or denial. With respect to any citation or quotation of a legal authority, that
15 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
16 allegations.

17 6. Paragraph 6 of the FAC consists of legal argument and/or conclusions that do not
18 require admission or denial. With respect to any citation or quotation of a legal authority, that
19 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
20 allegations.

21 7. Paragraph 7 of the FAC consists of legal argument and/or conclusions that do not
22 require admission or denial. With respect to any citation or quotation of a legal authority, that
23 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
24 allegations.

25 8. Paragraph 8 of the FAC consists of legal argument and/or conclusions that do not
26 require admission or denial. With respect to any citation or quotation of a legal authority, that
27 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
28 allegations.

1 9. Paragraph 9 of the FAC consists of legal argument and/or conclusions that do not
2 require admission or denial. With respect to any citation or quotation of a legal authority, that
3 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
4 allegations.

5 10. Paragraph 10 of the FAC consists of legal argument and/or conclusions that do not
6 require admission or denial. With respect to any citation or quotation of a legal authority, that
7 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
8 allegations.

9 11. Paragraph 11 of the FAC consists of legal argument and/or conclusions that do not
10 require admission or denial. With respect to any citation or quotation of a legal authority, that
11 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
12 allegations.

13 12. Paragraph 12 of the FAC consists of legal argument and/or conclusions that do not
14 require admission or denial. With respect to any citation or quotation of a legal authority, that
15 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
16 allegations.

17 13. In response to the allegations in paragraph 13 of the FAC, Plaintiffs' FAC and its
18 requests for relief speak for themselves. To the extent admission or denial is required, Defendant
19 denies all allegations.

20 **ANSWER TO ALLEGATIONS ON JURISDICTION AND VENUE**

21 14. Paragraph 14 of the FAC consists of legal argument and/or conclusions that do not
22 require admission or denial. With respect to any citation or quotation of a legal authority, that
23 authority speaks for itself. Defendant admits that this Court has subject matter jurisdiction. To
24 the extent admission or denial of the other allegations of the paragraph is required, Defendant
25 denies all allegations.

26 15. Paragraph 15 of the FAC consists of legal argument and/or conclusions that do not
27 require admission or denial. With respect to any citation or quotation of a legal authority, that
28

1 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
2 allegations.

3 16. Paragraph 16 of the FAC consists of legal argument and/or conclusions that do not
4 require admission or denial. With respect to any citation or quotation of a legal authority, that
5 authority speaks for itself. Defendant admits that venue is proper. To the extent admission or
6 denial of the other allegations of the paragraph is required, Defendant denies all allegations.

7 **ANSWER TO ALLEGATIONS ON PARTIES**

8 17. In response to the allegations in paragraph 17 of the FAC, Defendant lacks
9 knowledge or information sufficient to form a belief as to the truth of the allegations and,
10 therefore, denies them.

11 18. In response to the allegations in paragraph 18 of the FAC, Defendant lacks
12 knowledge or information sufficient to form a belief as to the truth of the allegations and,
13 therefore, denies them.

14 19. In response to the allegations in paragraph 19 of the FAC, Defendant lacks
15 knowledge or information sufficient to form a belief as to the truth of the allegations and,
16 therefore, denies them.

17 20. In response to the allegations in paragraph 20 of the FAC, Defendant lacks
18 knowledge or information sufficient to form a belief as to the truth of the allegations and,
19 therefore, denies them.

20 21. In response to the allegations in paragraph 21 of the FAC, Defendant lacks
21 knowledge or information sufficient to form a belief as to the truth of the allegations and,
22 therefore, denies them.

23 22. In response to the allegations in paragraph 22 of the FAC, Defendant lacks
24 knowledge or information sufficient to form a belief as to the truth of the allegations and,
25 therefore, denies them.

26 23. In response to the allegations in paragraph 23 and footnote 2 of the FAC, Defendant
27 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
28 therefore, denies them.

1 24. In response to the allegations in paragraph 24 of the FAC, Defendant lacks
2 knowledge or information sufficient to form a belief as to the truth of the allegations and,
3 therefore, denies them.

4 25. In response to the allegations in paragraph 25 of the FAC, Defendant lacks
5 knowledge or information sufficient to form a belief as to the truth of the allegations and,
6 therefore, denies them.

7 26. In response to the allegations in paragraph 26 of the FAC, Defendant lacks
8 knowledge or information sufficient to form a belief as to the truth of the allegations and,
9 therefore, denies them.

10 27. In response to the allegations in paragraph 27 of the FAC, Defendant lacks
11 knowledge or information sufficient to form a belief as to the truth of the allegations and,
12 therefore, denies them.

13 28. In response to the allegations in paragraph 28 of the FAC, Defendant lacks
14 knowledge or information sufficient to form a belief as to the truth of the allegations and,
15 therefore, denies them.

16 29. In response to the allegations in paragraph 29 of the FAC, Defendant lacks
17 knowledge or information sufficient to form a belief as to the truth of the allegations and,
18 therefore, denies them.

19 30. In response to the allegations in paragraph 30 of the FAC, Defendant lacks
20 knowledge or information sufficient to form a belief as to the truth of the allegations and,
21 therefore, denies them.

22 31. In response to the allegations in paragraph 31 of the FAC, Defendant lacks
23 knowledge or information sufficient to form a belief as to the truth of the allegations and,
24 therefore, denies them.

25 32. In response to the allegations in paragraph 32 of the FAC, Defendant lacks
26 knowledge or information sufficient to form a belief as to the truth of the allegations and,
27 therefore, denies them.

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1 33. In response to the allegations in paragraph 33 of the FAC, Defendant lacks
2 knowledge or information sufficient to form a belief as to the truth of the allegations and,
3 therefore, denies them.

4 34. In response to the allegations in paragraph 34 of the FAC, Defendant lacks
5 knowledge or information sufficient to form a belief as to the truth of the allegations and,
6 therefore, denies them.

7 35. In response to the allegations in paragraph 35 of the FAC, Defendant lacks
8 knowledge or information sufficient to form a belief as to the truth of the allegations and,
9 therefore, denies them.

10 36. In response to the allegations in paragraph 36 of the FAC, Defendant lacks
11 knowledge or information sufficient to form a belief as to the truth of the allegations and,
12 therefore, denies them.

13 37. In response to the allegations in paragraph 37 of the FAC, Defendant lacks
14 knowledge or information sufficient to form a belief as to the truth of the allegations and,
15 therefore, denies them.

16 38. In response to the allegations in paragraph 38 of the FAC, Defendant lacks
17 knowledge or information sufficient to form a belief as to the truth of the allegations and,
18 therefore, denies them.

19 39. In response to the allegations in paragraph 39 of the FAC, Defendant lacks
20 knowledge or information sufficient to form a belief as to the truth of the allegations and,
21 therefore, denies them.

22 40. In response to the allegations in paragraph 40 of the FAC, Defendant lacks
23 knowledge or information sufficient to form a belief as to the truth of the allegations and,
24 therefore, denies them.

25 41. In response to the allegations in paragraph 41 of the FAC, Defendant lacks
26 knowledge or information sufficient to form a belief as to the truth of the allegations and,
27 therefore, denies them.

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1 42. In response to the allegations in paragraph 42 of the FAC, Defendant lacks
2 knowledge or information sufficient to form a belief as to the truth of the allegations and,
3 therefore, denies them.

4 43. In response to the allegations in paragraph 43 of the FAC, Defendant lacks
5 knowledge or information sufficient to form a belief as to the truth of the allegations and,
6 therefore, denies them.

7 44. In response to the allegations in paragraph 44 of FAC, Defendant admits that he is the
8 Attorney General of the State of California and therefore the “chief law officer of the State” (Cal.
9 Const., art. V, § 13) and head of the California Department of Justice (Cal. Gov’t Code § 12510).
10 The remaining allegations in paragraph 44 of the FAC consist of legal argument and/or
11 conclusions that do not require admission or denial, but to the extent admission or denial is
12 required, Defendant denies them.

13 45. In response to the allegations in paragraph 45 of the FAC, Defendant lacks
14 knowledge or information sufficient to form a belief as to the truth of the allegations and,
15 therefore, denies them.

16 **ANSWER TO GENERAL ALLEGATIONS**

17 46. Defendant incorporates and reasserts his responses to paragraphs 1-45 of the FAC.

18 47. Paragraph 47 of the FAC consists of legal argument and/or conclusions that do not
19 require admission or denial. With respect to any citation or quotation of a legal authority, that
20 authority speaks for itself. Defendant admits that California law regulates the possession, use,
21 and acquisition of firearms by minors. To the extent admission or denial of the other allegations
22 of the paragraph is required, Defendant denies all allegations.

23 48. Paragraph 48 of the FAC consists of legal argument and/or conclusions that do not
24 require admission or denial. With respect to any citation or quotation of a legal authority, that
25 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
26 allegations.

27 49. Paragraph 49 of the FAC consists of legal argument and/or conclusions that do not
28 require admission or denial. With respect to any citation or quotation of a legal authority, that

1 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
2 allegations.

3 50. Paragraph 50 of the FAC consists of legal argument and/or conclusions that do not
4 require admission or denial. With respect to any citation or quotation of a legal authority, that
5 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
6 allegations.

7 51. Paragraph 51 of the FAC consists of legal argument and/or conclusions that do not
8 require admission or denial. With respect to any citation or quotation of a legal authority, that
9 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
10 allegations.

11 52. Paragraph 52 of the FAC consists of legal argument and/or conclusions that do not
12 require admission or denial. With respect to any citation or quotation of a legal authority, that
13 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
14 allegations.

15 53. Paragraph 53 of the FAC consists of legal argument and/or conclusions that do not
16 require admission or denial. With respect to any citation or quotation of a legal authority, that
17 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
18 allegations.

19 54. Paragraph 54 of the FAC consists of legal argument and/or conclusions that do not
20 require admission or denial. With respect to any citation or quotation of a legal authority, that
21 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
22 allegations.

23 55. In response to the allegations in paragraph 55 of the FAC, Defendant admits that the
24 California Legislature passed and Governor Newsom signed into law AB 2571 on June 30, 2022,
25 as an urgency statute. As to the remaining allegations, with respect to any citation or quotation of
26 a legal authority, that authority speaks for itself. To the extent admission or denial is required,
27 Defendant denies all allegations.
28

1 56. In response to the allegations in paragraph 56 of the FAC, Defendant admits that the
2 California Legislature passed AB 160 as a public safety trailer bill on August 31, 2022, that
3 Governor Newsom signed AB 160 into law, and that AB 160 amends certain language of Section
4 22949.80. Defendant denies all remaining allegations.

5 57. Paragraph 57 of the FAC consists of legal argument and/or conclusions that do not
6 require admission or denial. With respect to any citation or quotation of a legal authority, that
7 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
8 allegations.

9 58. Paragraph 58 of the FAC consists of legal argument and/or conclusions that do not
10 require admission or denial. With respect to any citation or quotation of a legal authority, that
11 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
12 allegations.

13 59. Paragraph 59 of the FAC consists of legal argument and/or conclusions that do not
14 require admission or denial. With respect to any citation or quotation of a legal authority, that
15 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
16 allegations.

17 60. Paragraph 60 of the FAC consists of legal argument and/or conclusions that do not
18 require admission or denial. With respect to any citation or quotation of a legal authority, that
19 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
20 allegations.

21 61. Paragraph 61 of the FAC consists of legal argument and/or conclusions that do not
22 require admission or denial. With respect to any citation or quotation of a legal authority, that
23 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
24 allegations.

25 62. Paragraph 62 of the FAC consists of legal argument and/or conclusions that do not
26 require admission or denial. With respect to any citation or quotation of a legal authority, that
27 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
28 allegations.

1 63. Paragraph 63 of the FAC consists of legal argument and/or conclusions that do not
2 require admission or denial. With respect to any citation or quotation of a legal authority, that
3 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
4 allegations.

5 64. Paragraph 64 of the FAC consists of legal argument and/or conclusions that do not
6 require admission or denial. With respect to any citation or quotation of a legal authority, that
7 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
8 allegations.

9 65. Paragraph 65 of the FAC consists of legal argument and/or conclusions that do not
10 require admission or denial. With respect to any citation or quotation of a legal authority, that
11 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
12 allegations.

13 66. Paragraph 66 of the FAC consists of legal argument and/or conclusions that do not
14 require admission or denial. With respect to any citation or quotation of a legal authority, that
15 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
16 allegations.

17 67. Paragraph 67 of the FAC consists of legal argument and/or conclusions that do not
18 require admission or denial. With respect to any citation or quotation of a legal authority, that
19 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
20 allegations.

21 68. Paragraph 68 of the FAC consists of legal argument and/or conclusions that do not
22 require admission or denial. With respect to any citation or quotation of a legal authority, that
23 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
24 allegations.

25 69. Paragraph 69 of the FAC consists of legal argument and/or conclusions that do not
26 require admission or denial. With respect to any citation or quotation of a legal authority, that
27 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
28 allegations.

1 70. Paragraph 70 of the FAC consists of legal argument and/or conclusions that do not
2 require admission or denial. With respect to any citation or quotation of a legal authority, that
3 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
4 allegations.

5 71. In response to the allegations in paragraph 71 of the FAC, Defendant lacks
6 knowledge or information sufficient to form a belief as to the truth of the allegations and,
7 therefore, denies them.

8 72. In response to the allegations in paragraph 72 of the FAC, Defendant lacks
9 knowledge or information sufficient to form a belief as to the truth of the allegations and,
10 therefore, denies them.

11 73. In response to the allegations in the body of paragraph 73 and footnote 3 of the FAC,
12 Defendant lacks knowledge or information sufficient to form a belief as to the truth of the
13 allegations and, therefore, denies them.

14 74. In response to the allegations in the body of paragraph 74 and footnote 4 of the FAC,
15 Defendant lacks knowledge or information sufficient to form a belief as to the truth of the
16 allegations and, therefore, denies them.

17 75. In response to the allegations in the body of paragraph 75 and footnote 5 of the FAC,
18 Defendant lacks knowledge or information sufficient to form a belief as to the truth of the
19 allegations and, therefore, denies them.

20 76. In response to the allegations in the body of paragraph 76 and footnotes 6 and 7 of the
21 FAC, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the
22 allegations and, therefore, denies them.

23 77. In response to the allegations in the body of paragraph 77 and footnote 8 of the FAC,
24 Defendant lacks knowledge or information sufficient to form a belief as to the truth of the
25 allegations and, therefore, denies them.

26 78. In response to the allegations in the body of paragraph 78 and footnote 9 of the FAC,
27 Defendant lacks knowledge or information sufficient to form a belief as to the truth of the
28 allegations and, therefore, denies them.

1 79. In response to the allegations in paragraph 79 of the FAC, Defendant lacks
2 knowledge or information sufficient to form a belief as to the truth of the allegations and,
3 therefore, denies them.

4 80. In response to the allegations in paragraph 80 of the FAC, Defendant lacks
5 knowledge or information sufficient to form a belief as to the truth of the allegations and,
6 therefore, denies them.

7 81. In response to the allegations in paragraph 81 of the FAC, Defendant lacks
8 knowledge or information sufficient to form a belief as to the truth of the allegations and,
9 therefore, denies them. With respect to any citation or quotation of a legal authority, that
10 authority speaks for itself.

11 82. In response to the allegations in paragraph 82 of the FAC, Defendant lacks
12 knowledge or information sufficient to form a belief as to the truth of the allegations and,
13 therefore, denies them.

14 83. In response to the allegations in paragraph 83 of the FAC, Defendant lacks
15 knowledge or information sufficient to form a belief as to the truth of the allegations and,
16 therefore, denies them.

17 84. In response to the allegations in paragraph 84 of the FAC, Defendant lacks
18 knowledge or information sufficient to form a belief as to the truth of the allegations and,
19 therefore, denies them.

20 85. In response to the allegations in paragraph 85 of the FAC, Defendant lacks
21 knowledge or information sufficient to form a belief as to the truth of the allegations and,
22 therefore, denies them.

23 86. In response to the allegations in paragraph 86 of the FAC, Defendant lacks
24 knowledge or information sufficient to form a belief as to the truth of the allegations and,
25 therefore, denies them.

26 87. In response to the allegations in paragraph 87 of the FAC, Defendant lacks
27 knowledge or information sufficient to form a belief as to the truth of the allegations regarding
28 the activities Plaintiffs desire to engage in and, therefore, denies them. The remaining allegations

1 regarding whether those desired activities would violate Section 22949.80 consist of legal
2 argument and/or conclusions that do not require admission or denial. To the extent admission or
3 denial is required, Defendant denies the allegations.

4 88. In response to the allegations in paragraph 88 of the FAC, Defendant lacks
5 knowledge or information sufficient to form a belief as to the truth of the allegations and,
6 therefore, denies them.

7 89. In response to the allegations in paragraph 89 of the FAC, Defendant lacks
8 knowledge or information sufficient to form a belief as to the truth of the allegations and,
9 therefore, denies them.

10 90. In response to the allegations in paragraph 90 of the FAC, Defendant lacks
11 knowledge or information sufficient to form a belief as to the truth of the allegations and,
12 therefore, denies them.

13 91. Defendant denies the allegations in paragraph 91 of the FAC. In response to the
14 allegations in footnote 10, Defendant admits that Plaintiffs' allegations that "our hunting heritage
15 is often overlooked" is vague and lacks context and Defendant therefore lacks knowledge or
16 information sufficient to form a belief as to the truth of the allegations and, therefore, denies
17 them. With respect to any citation or quotation of a legal or historical authority, that authority
18 speaks for itself. To the extent admission or denial is required as all remaining allegations,
19 Defendant lacks knowledge or information sufficient to form a belief as to the truth of the
20 allegations and, therefore, denies them.

21 92. Paragraph 92 of the FAC consists of legal argument and/or conclusions that do not
22 require admission or denial. To the extent admission or denial is required, Defendant denies all
23 allegations.

24 93. In response to the body of paragraph 93 and footnote 11 of the FAC, the quoted
25 legislative history report speaks for itself. To the extent admission or denial is required,
26 Defendant denies all allegations.

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1 94. In response to the body of paragraph 94 and footnote 12 of the FAC, the quoted
2 legislative history report speaks for itself. To the extent admission or denial is required,
3 Defendant denies all allegations.

4 95. Paragraph 95 of the FAC consists of legal argument and/or conclusions that do not
5 require admission or denial. With respect to any citation or quotation of a legal authority, that
6 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
7 allegations.

8 96. In response to the allegations in the body of paragraph 96 of the FAC and footnote
9 13, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the
10 allegations and, therefore, denies them.

11 97. In response to the allegations in paragraph 97 of the FAC, Defendant lacks
12 knowledge or information sufficient to form a belief as to the truth of the allegations, and
13 therefore denies that Plaintiffs have declined to engage in any activities and denies the reason for
14 allegedly declining to engage in any activities. The remaining allegations consist of legal
15 argument and/or conclusions that do not require admission or denial, although to the extent
16 admission or denial is required, Defendant denies them.

17 **ANSWER TO ALLEGATIONS OF FIRST CLAIM FOR RELIEF**

18 98. Defendant incorporates and reasserts his responses to paragraphs 1-97 of the FAC.

19 99. Paragraph 99 of the FAC consists of legal argument and/or conclusions that do not
20 require admission or denial. With respect to any citation or quotation of a legal authority, that
21 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
22 allegations.

23 100. Paragraph 100 of the FAC consists of legal argument and/or conclusions that do not
24 require admission or denial. With respect to any citation or quotation of a legal authority, that
25 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
26 allegations.

27 101. Paragraph 101 of the FAC consists of legal argument and/or conclusions that do not
28 require admission or denial. With respect to any citation or quotation of a legal authority, that

1 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
2 allegations.

3 102. Paragraph 102 of the FAC consists of legal argument and/or conclusions that do not
4 require admission or denial. With respect to any citation or quotation of a legal authority, that
5 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
6 allegations.

7 103. Paragraph 103 of the FAC consists of legal argument and/or conclusions that do not
8 require admission or denial. With respect to any citation or quotation of a legal authority, that
9 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
10 allegations.

11 104. Paragraph 104 of the FAC consists of legal argument and/or conclusions that do not
12 require admission or denial. With respect to any citation or quotation of a legal authority, that
13 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
14 allegations.

15 105. Paragraph 105 of the FAC consists of legal argument and/or conclusions that do not
16 require admission or denial. With respect to any citation or quotation of a legal authority, that
17 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
18 allegations.

19 106. Paragraph 106 of the FAC consists of legal argument and/or conclusions that do not
20 require admission or denial. With respect to any citation or quotation of a legal authority, that
21 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
22 allegations.

23 107. Paragraph 107 of the FAC consists of legal argument and/or conclusions that do not
24 require admission or denial. With respect to any citation or quotation of a legal authority, that
25 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
26 allegations.

27 108. Paragraph 108 of the FAC consists of legal argument and/or conclusions that do not
28 require admission or denial. With respect to any citation or quotation of a legal authority, that

1 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
2 allegations.

3 109. Paragraph 109 of the FAC consists of legal argument and/or conclusions that do not
4 require admission or denial. With respect to any citation or quotation of a legal authority, that
5 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
6 allegations.

7 110. Paragraph 110 of the FAC consists of legal argument and/or conclusions that do not
8 require admission or denial. With respect to any citation or quotation of a legal authority, that
9 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
10 allegations.

11 111. Paragraph 111 of the FAC consists of legal argument and/or conclusions that do not
12 require admission or denial. With respect to any citation or quotation of a legal authority, that
13 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
14 allegations.

15 112. Paragraph 112 of the FAC consists of legal argument and/or conclusions that do not
16 require admission or denial. With respect to any citation or quotation of a legal authority, that
17 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
18 allegations.

19 113. In response to the allegations in paragraph 113 of the FAC, Plaintiffs' FAC and its
20 requests for relief speak for themselves. To the extent admission or denial is required as to the
21 allegations of the relief sought by Plaintiffs, Defendant denies all allegations.

22 The remaining allegations in Paragraph 113 of the FAC consist of legal argument and/or
23 conclusions that do not require admission or denial. To the extent admission or denial is required,
24 Defendant denies all allegations.

25 **ANSWER TO ALLEGATIONS OF SECOND CLAIM FOR RELIEF**

26 114. Defendant incorporates and reasserts his responses to paragraphs 1-113 of the FAC.

27 115. Paragraph 115 of the FAC consists of legal argument and/or conclusions that do not
28 require admission or denial. With respect to any citation or quotation of a legal authority, that

1 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
2 allegations.

3 116. Paragraph 116 of the FAC consists of legal argument and/or conclusions that do not
4 require admission or denial. With respect to any citation or quotation of a legal authority, that
5 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
6 allegations.

7 117. Paragraph 117 of the FAC consists of legal argument and/or conclusions that do not
8 require admission or denial. With respect to any citation or quotation of a legal authority, that
9 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
10 allegations.

11 118. The body of Paragraph 118 and footnote 14 of the FAC consist of legal argument
12 and/or conclusions that do not require admission or denial. With respect to any citation or
13 quotation of a legal authority, that authority speaks for itself. To the extent admission or denial is
14 required, Defendant denies all allegations.

15 119. Paragraph 119 of the FAC consists of legal argument and/or conclusions that do not
16 require admission or denial. With respect to any citation or quotation of a legal authority, that
17 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
18 allegations.

19 120. Paragraph 120 of the FAC consists of legal argument and/or conclusions that do not
20 require admission or denial. With respect to any citation or quotation of a legal authority, that
21 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
22 allegations.

23 121. Paragraph 121 of the FAC consists of legal argument and/or conclusions that do not
24 require admission or denial. With respect to any citation or quotation of a legal authority, that
25 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
26 allegations.

27 122. Paragraph 122 of the FAC consists of legal argument and/or conclusions that do not
28 require admission or denial. With respect to any citation or quotation of a legal authority, that

1 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
2 allegations.

3 123. Paragraph 123 of the FAC consists of legal argument and/or conclusions that do not
4 require admission or denial. With respect to any citation or quotation of a legal authority, that
5 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
6 allegations.

7 124. Paragraph 124 of the FAC consists of legal argument and/or conclusions that do not
8 require admission or denial. With respect to any citation or quotation of a legal authority, that
9 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
10 allegations.

11 125. Paragraph 125 of the FAC consists of legal argument and/or conclusions that do not
12 require admission or denial. With respect to any citation or quotation of a legal authority, that
13 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
14 allegations.

15 126. Paragraph 126 of the FAC consists of legal argument and/or conclusions that do not
16 require admission or denial. With respect to any citation or quotation of a legal authority, that
17 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
18 allegations.

19 127. Paragraph 127 of the FAC consists of legal argument and/or conclusions that do not
20 require admission or denial. With respect to any citation or quotation of a legal authority, that
21 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
22 allegations.

23 128. In response to the allegations in paragraph 128 of the FAC, Plaintiffs' FAC and its
24 requests for relief speak for themselves. To the extent admission or denial is required as to the
25 allegations of the relief sought by Plaintiffs, Defendant denies all allegations. The remaining
26 allegations in Paragraph 128 of the FAC consist of legal argument and/or conclusions that do not
27 require admission or denial. To the extent admission or denial is required, Defendant denies all
28 allegations.

ANSWER TO ALLEGATIONS OF THIRD CLAIM FOR RELIEF

129. Defendant incorporates and reasserts his responses to paragraphs 1-128 of the FAC.

130. Paragraph 130 of the FAC consists of legal argument and/or conclusions that do not require admission or denial. With respect to any citation or quotation of a legal authority, that authority speaks for itself. To the extent admission or denial is required, Defendant denies all allegations.

131. Paragraph 131 of the FAC consists of legal argument and/or conclusions that do not require admission or denial. With respect to any citation or quotation of a legal authority, that authority speaks for itself. To the extent admission or denial is required, Defendant denies all allegations.

132. Paragraph 132 of the FAC consists of legal argument and/or conclusions that do not require admission or denial. With respect to any citation or quotation of a legal authority, that authority speaks for itself. To the extent admission or denial is required, Defendant denies all allegations.

133. Paragraph 133 of the FAC consists of legal argument and/or conclusions that do not require admission or denial. With respect to any citation or quotation of a legal authority, that authority speaks for itself. To the extent admission or denial is required, Defendant denies all allegations.

134. Paragraph 134 of the FAC consists of legal argument and/or conclusions that do not require admission or denial. With respect to any citation or quotation of a legal authority, that authority speaks for itself. To the extent admission or denial is required, Defendant denies all allegations.

135. Paragraph 135 of the FAC consists of legal argument and/or conclusions that do not require admission or denial. With respect to any citation or quotation of a legal authority, that authority speaks for itself. To the extent admission or denial is required, Defendant denies all allegations.

136. Paragraph 136 of the FAC consists of legal argument and/or conclusions that do not require admission or denial. With respect to any citation or quotation of a legal authority, that

1 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
2 allegations.

3 137. In response to the allegations in paragraph 137 of the FAC, Defendant lacks
4 knowledge or information sufficient to form a belief as to the truth of the allegations and,
5 therefore, denies them.

6 138. Paragraph 138 of the FAC consists of legal argument and/or conclusions that do not
7 require admission or denial. With respect to any citation or quotation of a legal authority, that
8 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
9 allegations.

10 139. Paragraph 139 of the FAC consists of legal argument and/or conclusions that do not
11 require admission or denial. With respect to any citation or quotation of a legal authority, that
12 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
13 allegations.

14 140. In response to the allegations in paragraph 140 of the FAC, Plaintiffs' FAC and its
15 requests for relief speak for themselves. To the extent admission or denial is required as to the
16 allegations of the relief sought by Plaintiffs, Defendant denies all allegations. The remaining
17 allegations in Paragraph 140 of the FAC consist of legal argument and/or conclusions that do not
18 require admission or denial. To the extent admission or denial is required, Defendant denies all
19 allegations.

20 **ANSWER TO ALLEGATIONS OF FOURTH CLAIM FOR RELIEF**

21 141. Defendant incorporates and reasserts his responses to paragraphs 1-140 of the FAC.

22 142. Paragraph 142 of the FAC consists of legal argument and/or conclusions that do not
23 require admission or denial. With respect to any citation or quotation of a legal authority, that
24 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
25 allegations.

26 143. Paragraph 143 of the FAC consists of legal argument and/or conclusions that do not
27 require admission or denial. With respect to any citation or quotation of a legal authority, that
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1 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
2 allegations.

3 144. Paragraph 144 of the FAC consists of legal argument and/or conclusions that do not
4 require admission or denial. With respect to any citation or quotation of a legal authority, that
5 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
6 allegations.

7 145. Paragraph 145 of the FAC consists of legal argument and/or conclusions that do not
8 require admission or denial. With respect to any citation or quotation of a legal authority, that
9 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
10 allegations.

11 146. Paragraph 146 of the FAC consists of legal argument and/or conclusions that do not
12 require admission or denial. With respect to any citation or quotation of a legal authority, that
13 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
14 allegations.

15 147. Paragraph 147 of the FAC consists of legal argument and/or conclusions that do not
16 require admission or denial. With respect to any citation or quotation of a legal authority, that
17 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
18 allegations.

19 148. Paragraph 148 of the FAC consists of legal argument and/or conclusions that do not
20 require admission or denial. With respect to any citation or quotation of a legal authority, that
21 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
22 allegations.

23 149. In response to paragraph 149 in the FAC, Defendant lacks knowledge or information
24 sufficient to form a belief as to the truth, and therefore deny the allegations that “Plaintiffs have
25 already started to curtail [any] speech.” The remainder of paragraph 154 consists of legal
26 argument and/or conclusions that does not require admission or denial. With respect to any
27 citation or quotation of a legal authority, that authority speaks for itself. To the extent admission
28 or denial is required, Defendant denies all allegations.

1 150. Paragraph 150 of the FAC consists of legal argument and/or conclusions that do not
2 require admission or denial. With respect to any citation or quotation of a legal authority, that
3 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
4 allegations.

5 151. Paragraph 151 of the FAC consists of legal argument and/or conclusions that do not
6 require admission or denial. With respect to any citation or quotation of a legal authority, that
7 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
8 allegations.

9 152. In response to the allegations in paragraph 152 of the FAC, Plaintiffs' FAC and its
10 requests for relief speak for themselves. To the extent admission or denial is required as to the
11 allegations of the relief sought by Plaintiffs, Defendant denies all allegations. The remaining
12 allegations in Paragraph 152 of the FAC consist of legal argument and/or conclusions that do not
13 require admission or denial. To the extent admission or denial is required, Defendant denies all
14 allegations.

15 **ANSWER TO ALLEGATIONS OF FIFTH CLAIM FOR RELIEF**

16 153. Defendant incorporates and reasserts his responses to paragraphs 1-152 of the FAC.

17 154. Paragraph 154 of the FAC consists of legal argument and/or conclusions that do not
18 require admission or denial. With respect to any citation or quotation of a legal authority, that
19 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
20 allegations.

21 155. Paragraph 155 of the FAC consists of legal argument and/or conclusions that do not
22 require admission or denial. With respect to any citation or quotation of a legal authority, that
23 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
24 allegations.

25 156. Paragraph 156 of the FAC consists of legal argument and/or conclusions that do not
26 require admission or denial. With respect to any citation or quotation of a legal authority, that
27 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
28 allegations.

1 157. Paragraph 157 of the FAC consists of legal argument and/or conclusions that do not
2 require admission or denial. With respect to any citation or quotation of a legal authority, that
3 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
4 allegations.

5 158. Paragraph 158 of the FAC consists of legal argument and/or conclusions that do not
6 require admission or denial. With respect to any citation or quotation of a legal authority, that
7 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
8 allegations.

9 159. Paragraph 159 of the FAC consists of legal argument and/or conclusions that do not
10 require admission or denial. With respect to any citation or quotation of a legal authority, that
11 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
12 allegations.

13 160. Paragraph 160 of the FAC consists of legal argument and/or conclusions that do not
14 require admission or denial. With respect to any citation or quotation of a legal authority, that
15 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
16 allegations.

17 161. Paragraph 161 of the FAC consists of legal argument and/or conclusions that do not
18 require admission or denial. With respect to any citation or quotation of a legal authority, that
19 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
20 allegations.

21 162. Paragraph 162 of the FAC consists of legal argument and/or conclusions that do not
22 require admission or denial. With respect to any citation or quotation of a legal authority, that
23 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
24 allegations.

25 163. In response to the allegations in paragraph 163 of the FAC, Plaintiffs' FAC and its
26 requests for relief speak for themselves. To the extent admission or denial is required as to the
27 allegations of the relief sought by Plaintiffs, Defendant denies all allegations.
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1 The remaining allegations in Paragraph 163 of the FAC consist of legal argument and/or
2 conclusions that do not require admission or denial. To the extent admission or denial is required,
3 Defendant denies all allegations.

4 **ANSWER TO ALLEGATIONS OF SIXTH CLAIM FOR RELIEF**

5 164. Defendant incorporates and reasserts his responses to paragraphs 1-163 of the FAC.

6 165. Paragraph 165 of the FAC consists of legal argument and/or conclusions that do not
7 require admission or denial. With respect to any citation or quotation of a legal authority, that
8 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
9 allegations.

10 166. Paragraph 166 of the FAC consists of legal argument and/or conclusions that do not
11 require admission or denial. With respect to any citation or quotation of a legal authority, that
12 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
13 allegations.

14 167. Paragraph 167 of the FAC consists of legal argument and/or conclusions that do not
15 require admission or denial. With respect to any citation or quotation of a legal authority, that
16 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
17 allegations.

18 168. Paragraph 168 of the FAC consists of legal argument and/or conclusions that do not
19 require admission or denial. With respect to any citation or quotation of a legal authority, that
20 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
21 allegations.

22 169. Paragraph 169 of the FAC consists of legal argument and/or conclusions that do not
23 require admission or denial. With respect to any citation or quotation of a legal authority, that
24 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
25 allegations.

26 170. Paragraph 170 of the FAC consists of legal argument and/or conclusions that do not
27 require admission or denial. With respect to any citation or quotation of a legal authority, that
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1 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
2 allegations.

3 171. Paragraph 171 of the FAC consists of legal argument and/or conclusions that do not
4 require admission or denial. With respect to any citation or quotation of a legal authority, that
5 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
6 allegations.

7 172. Paragraph 172 of the FAC consists of legal argument and/or conclusions that do not
8 require admission or denial. With respect to any citation or quotation of a legal authority, that
9 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
10 allegations.

11 173. Paragraph 173 of the FAC consists of legal argument and/or conclusions that do not
12 require admission or denial. With respect to any citation or quotation of a legal authority, that
13 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
14 allegations.

15 174. Paragraph 174 of the FAC consists of legal argument and/or conclusions that do not
16 require admission or denial. With respect to any citation or quotation of a legal authority, that
17 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
18 allegations.

19 175. Paragraph 175 of the FAC consists of legal argument and/or conclusions that do not
20 require admission or denial. With respect to any citation or quotation of a legal authority, that
21 authority speaks for itself. To the extent admission or denial is required, Defendant denies all
22 allegations.

23 176. In response to the allegations in paragraph 176 of the FAC, Plaintiffs' FAC and its
24 requests for relief speak for themselves. To the extent admission or denial is required as to the
25 allegations of the relief sought by Plaintiffs, Defendant denies all allegations. The remaining
26 allegations in Paragraph 176 of the FAC consist of legal argument and/or conclusions that do not
27 require admission or denial. To the extent admission or denial is required, Defendant denies all
28 allegations.

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ANSWER TO PRAYER FOR RELIEF

No response is required to Plaintiffs’ prayer for relief. To the extent Defendant is required to respond, he denies that Plaintiffs are entitled to the requested relief.

DEFENSES

In addition to the foregoing admissions and denials, and without admitting any allegations contained in the FAC, Defendants assert the following defenses.

FIRST DEFENSE

The FAC, and each cause of action alleged therein, is barred by the doctrine of mootness.

SECOND DEFENSE

The FAC, and each cause of action alleged therein, fails to state a claim on which relief can be granted.

RESERVATION OF DEFENSES

The foregoing defenses are raised without waiver of any other defenses that might become known during this litigation. Defendant hereby reserves his right to amend or supplement their answer to assert any other related defenses.

PRAYER OF DEFENDANTS

WHEREFORE, Defendant prays that:

1. The FAC, and all claims and prayers for relief therein, be denied in their entirety;
2. Plaintiffs take nothing from Defendant by this action;
3. Defendant be awarded its costs incurred in defending this action;
4. Defendant be awarded such further relief that the Court may deem just and proper.

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Dated: November 1, 2022

Respectfully submitted,

ROB BONTA
Attorney General of California
ANTHONY R. HAKL
Supervising Deputy Attorney General

/s/ Gabrielle D. Boutin
GABRIELLE D. BOUTIN
Deputy Attorney General
*Attorneys for Defendant Attorney General
Rob Bonta, in his official capacity*

CERTIFICATE OF SERVICE

Case Name: **So Cal Top Guns, Inc. v. Rob
Bonta**

No. **2:22-cv-01395-DAD-JDP**

I hereby certify that on November 1, 2022, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**ANSWER TO FIRST AMENDED COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on November 1, 2022, at Sacramento, California.

Eileen A. Ennis

Declarant

/s/ Eileen A. Ennis

Signature