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18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

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

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF ALAN GOTTLIEB**

1  
2 1. I, Alan Gottlieb, am the Vice President of Plaintiff Second Amendment  
3 Foundation (hereinafter “SAF”). 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. SAF is a non-profit membership and donor-supported organization classified  
7 under IRC section 501(c)(4) and incorporated under the laws the state of  
8 Washington with its headquarters in Bellevue, Washington.

9 3. SAF has over 700,000 members and supporters nationwide, including  
10 thousands of members in California. SAF is dedicated to promoting a better  
11 understanding about our constitutional heritage to privately own, possess, and carry  
12 firearms through educational and legal action programs designed to better inform  
13 the public about gun control issues.

14 4. SAF has been a pioneer in innovative defense of the right to keep and bear  
15 arms, through its publications and public education programs like the Gun Rights  
16 Policy Conference. SAF also expends significant sums of money sponsoring public  
17 interest litigation to defend its own interests to disseminate information to like-  
18 minded individuals, in an individualized setting like a gun show, but SAF also  
19 seeks to defend the interests of its members in lawsuits like this present effort.

20 5. Many SAF members in California have valid and current concealed carry  
21 weapon (“CCW”) permits, which enables them to lawfully carry a concealed  
22 firearm in public, so that they can defend themselves (and potentially others) with  
23 lethal force in the event of a life-threatening emergency situation.

24 6. Because SB 2 would prohibit SAF’s members in California from carrying in  
25 many places where they often carry and are accustomed to concealed carrying a  
26 firearm, the utility of their CCWs, and thus their right to be armed for self-defense  
27 in public, will be severely curtailed and outright eliminated in many common  
28 locations.

1 7. For example, under SB 2 they cannot carry where alcohol for consumption  
2 on the premises is served. That means they cannot conceal carry at restaurants they  
3 patronize on a regular basis, nor carry in the parking area outside such an  
4 establishment.


5 8. SB 2 also prohibits SAF members in California from concealed carrying in  
6 parks and public lands they often frequent. And under SB 2, carry is prohibited at  
7 urgent care facilities which SAF members have used in the past for rapid medical  
8 attention and would use in the future. Under SB 2, carry is prohibited at financial  
9 institutions such as banks that SAF members frequent.

10 9. Perhaps most significantly, under SB 2, concealed carry is prohibited at any  
11 privately owned commercial establishment that does not affirmatively display  
12 notice that the establishment tolerates concealed carry at the establishment's  
13 premises. There are many local businesses that SAF members frequent that will  
14 likely not post such signs, forcing them to either not carry there or stop patronizing  
15 them.

16 10. These are just a few examples of how SB 2 harms our members. Suffice it to  
17 say, SAF believes that SB 2 is abhorrent and incompatible with the general right of  
18 Americans, including Californians who are SAF members, to carry a firearm in  
19 public for self-defense.

20  
21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed within in the United States on September 29, 2023.

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24   
25 Alan Gottlieb,  
26 Declarant for Plaintiff SAF  
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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

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:

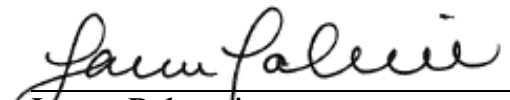
**DECLARATION OF ALAN GOTTLIEB IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

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