

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
4 [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
5 Konstadinos T. Moros – SBN 306610  
6 [kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
7 MICHEL & ASSOCIATES, P.C.  
8 180 E. Ocean Blvd., Suite 200  
9 Long Beach, CA 90802  
10 Telephone: (562) 216-4444  
11 Facsimile: (562) 216-4445

12 Donald Kilmer-SBN 179986  
13 Law Offices of Donald Kilmer, APC  
14 14085 Silver Ridge Road  
15 Caldwell, Idaho 83607  
16 Telephone: (408) 264-8489  
17 Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

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 ERICH PRATT  
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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF ERICH PRATT**

1. I, Erich Pratt, am the Senior Vice President of Gun Owners of America, Inc. (“GOA”), and the Senior Vice President of Gun Owners Foundation (“GOF”); both are Plaintiffs in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. GOA is a California non-stock corporation and a not-for-profit membership organization with its principal place of business in Springfield, Virginia, exempt from federal income taxes under Section 501(c)(4) of the U.S. Internal Revenue Code. GOA was formed in 1976 to preserve and defend the Second Amendment rights of gun owners. GOA has more than 2 million members and supporters across the country, including residents within this judicial district and throughout the State of California.

3. GOF is a Virginia non-stock corporation and a not-for-profit legal defense and educational foundation with its principal place of business in Springfield, Virginia, exempt from federal income taxes under Section 501(c)(3) of the U.S. Internal Revenue Code. GOF was formed in 1983 and is supported by gun owners across the country, within this judicial district, and throughout the State of California who will be irreparably harmed by the implementation and enforcement of SB 2.

4. Many GOA and GOF members and supporters in California have valid and current concealed carry weapon (“CCW”) permits, which enable them to lawfully carry a concealed firearm in public so that they can defend themselves (and potentially others) in the event of a life-threatening emergency situation.

5. Because SB 2 would prohibit GOA and GOF members and supporters in California from carrying a concealed firearm in many places where they often carry and are accustomed to carrying such firearms, the utility of their CCWs, and thus their right to be armed for self-defense in public, will be severely infringed,

1 curtailed, and outright eliminated in many common locations.

2 6. For example, under SB 2, GOA and GOF members and supporters cannot  
3 carry concealed firearms where alcohol is served for consumption on the premises.  
4 Accordingly, they cannot conceal carry at restaurants they patronize on a regular  
5 basis, nor in the parking area outside such establishments.

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

12 8. Perhaps most significantly, under SB 2, concealed carry is prohibited at any  
13 privately owned commercial establishment that does not affirmatively display  
14 notice that the establishment tolerates or supports concealed carry on the premises.  
15 There are many local businesses that GOA and GOF members and supporters  
16 frequent that almost certainly will not bother to post such signs that are politically  
17 unpopular in much of California, forcing persons either to not carry there or stop  
18 patronizing these locations entirely.

19 9. These are just a few examples of how SB 2 harms the members and  
20 supporters of GOA and GOF. SB 2 renders most of California off-limits and utterly  
21 un navigable to GOA and GOF members and supporters attempting to exercise their  
22 enumerated constitutional right to “bear arms” as they go about their daily lives.

23 10. In other words, GOA and GOF’s members and supporters are representative  
24 of those affected by SB 2’s unconstitutional mandates, which has a ubiquitous and  
25 negative effect not only on gun owners across the state but also on the general  
26 public, by depriving the public of a responsible, armed citizenry, which contributes  
27 to “the security of a free state.”

28 11. Protection of these rights and interests advanced in this litigation is germane

1 to GOA and GOF’s respective missions, which includes efforts to preserve and  
2 protect the Second Amendment and the rights of Americans to keep and bear arms.  
3 GOA and GOF routinely litigate cases throughout the country on behalf of their  
4 members and supporters, and GOA and GOF are capable of fully and faithfully  
5 representing the interests of their members and supporters without participation by  
6 each such person.

7 12.Suffice it to say, GOA and GOF believe that SB 2 is abhorrent and  
8 incompatible with the general right of Americans, including Californians who are  
9 GOA and GOF members and supporters, to carry a firearm in public for self-  
10 defense.

11 I declare under penalty of perjury that the foregoing is true and correct.  
12 Executed within the United States on September 29, 2023.

13   
14 Erich Pratt, declarant

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**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 ERICH PRATT 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