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Harris, On Target Indoor Shooting Range, LLC, Gaalswyk Enterprises, Inc.  
(D/B/A/ Smokin’ Barrel Firearms), Gun Owners of California, Inc., Gun Owners of  
7 America, Inc., Gun Owners Foundation, and California Rifle & Pistol Association,  
Incorporated  
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12 Attorney for Plaintiff Second Amendment Foundation

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 ADAM RICHARDS, an individual;  
JEFFREY VANDERMEULEN, an  
16 individual; GERALD CLARK, an  
individual; JESSE HARRIS, an  
17 individual; ON TARGET INDOOR  
SHOOTING RANGE, LLC;  
18 GAALSWYK ENTERPRISES, INC.  
(D/B/A/ SMOKIN’ BARREL  
19 FIREARMS); GUN OWNERS OF  
CALIFORNIA, INC.; GUN OWNERS  
20 OF AMERICA, INC.; GUN OWNERS  
FOUNDATION; CALIFORNIA RIFLE  
21 & PISTOL ASSOCIATION,  
INCORPORATED; and SECOND  
22 AMENDMENT FOUNDATION, a  
California Corporation,

23 Plaintiffs,

24 v.

25 GAVIN NEWSOM, in his official  
26 capacity as Governor of the State of  
California; ROBERT BONTA, in his  
27 official capacity as Attorney General of  
the State of California, and DOES 1-10,  
28

Defendants.

Case No.:

**DECLARATION OF ALAN  
GOTTLIEB IN SUPPORT OF  
PLAINTIFFS’ COMPLAINT FOR  
DECLARATORY AND INJUNCTIVE  
RELIEF**

**DECLARATION OF ALAN GOTTLIEB**

1  
2 1. I, Alan Gottlieb, am the Executive Vice President and founder of Plaintiff  
3 Second Amendment Foundation (“SAF”), a plaintiff in the above-entitled action. I  
4 make this declaration of my own personal knowledge, and, if called as a witness, I  
5 could and would testify competently to the 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 of the state of  
8 Washinton with its headquarters in Bellevue, Washington.

9 3. SAF has over 720,000 members that we work with across the nation, with  
10 many in California. Many of these members are Federal Firearm Licensees and gun  
11 owners who frequent gun shops, gun shows, and private FFL establishments.

12 4. SAF’s members include law enforcement officers, prosecutors, professionals,  
13 firearm experts, FFLs, attorneys, gun owners, and members of the general public.  
14 SAF accomplishes these goals through educational offerings, publications, member  
15 engagement, legislative advocacy, and litigation.

16 5. SAF seeks to defend the Second Amendment, promote a better understanding  
17 of our constitutional heritage to own and possess firearms privately, and advance  
18 laws that protect the rights of individual citizens. SAF works to preserve the  
19 constitutional and statutory rights of gun ownership, including the rights to self-  
20 defense, the right to hunt, and the right to keep and bear arms. SAF works to defeat  
21 anti-Second Amendment legislation and defend against unconstitutional laws in  
22 court.

23 6. SAF also strives to educate the public about gun control issues. SAF is a  
24 pioneer and innovator in the defense of the right to keep and bear arms through its  
25 publications and education programs like the Gun Rights Policy Conference.

26 7. SAF expends a significant amount of money sponsoring public interest  
27 litigation to defend its own interests and the interests of its members and supporters.

28 8. It is crucial to the success of SAF that its promotional materials, publications,

1 and messages are communicated to people of the “gun culture,” who are the very  
2 people who frequent gun shops, gun shows, and FFL establishments. It is also  
3 crucial that SAF be able to freely communicate with people in gun shops, attending  
4 gun shows, and with individual FFLs regarding their rights, the gun control  
5 movement’s agenda and tactics, and the need to understand their rights. These  
6 conversations are many times one-on-one, but even if they are not one-on-one  
7 conversations, people in shops picking up information about political speech and  
8 making a decision to support pro-Second Amendment groups like SAF while the  
9 government is recording them is cringeworthy, to say the least.

10 9. SB 1384 would capture and collect each and every word and action of  
11 someone engaged in lawful political speech and association, even if they never  
12 purchase a firearm at the counter. Because of the vile intrusions by SB 1384, many  
13 gun owners will not go to gun shops or gun shows and will never have these very  
14 important conversations.

15 10.SAF members have reached out to SAF, expressing concern over what SB  
16 1384 would do to their businesses and customers. SB 1384 is cost-prohibitive to  
17 many FFL members and would put them out of business; many do not want  
18 intrusive recording in their homes and shops, and others are concerned that  
19 customers will be kept away by the violation of their privacy.

20 11.SAF will also be harmed directly through the implementation of SB 1384.  
21 These SAF materials and discussions that explain what is happening legislatively,  
22 politically, and legally in the state are a convenient way for FFLs to in turn provide  
23 that information to their customers. Many SAF members make the decision to sign  
24 up as members while in a gun shop or at a gun show so they can continue receiving  
25 this type of information. SB 1384 may chill their desire to join a group like SAF if  
26 they know the anti-gun government is monitoring that activity. This will affect  
27 SAF’s ability to perform our mission, associate with gun owners looking for  
28 information, and protect Second Amendment rights in California.

1 establishments to conduct these constitutionally protected activities. They would  
2 also have to choose between allowing some rights to be violated to exercise other  
3 rights.

4 13. Under SB 1384, SAF members who are FFLs would be forced by the  
5 government to purchase expensive monitoring equipment, record all activities 24  
6 hours per day, and record the activities of their customers who may not consent to  
7 be recorded, thus opening them up to potential liability for violating customer  
8 privacy.

9 14. If SB 1384's recording provisions are allowed to stay in place, SAF's  
10 members' and supporters' constitutional rights will be violated, and SAF will be  
11 prevented from carrying out its full mission because of the ever-present government  
12 surveillance scheme found in SB 1384.

13 I declare under penalty of perjury that the foregoing is true and correct.  
14 Executed within the United States on December 18, 2023.

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17 ALAN GOTTLIEB  
18 Declarant  
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