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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  
8

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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 GERALD  
CLARK IN SUPPORT OF  
PLAINTIFFS’ COMPLAINT FOR  
DECLARATORY AND INJUNCTIVE  
RELIEF**

**DECLARATION OF GERALD CLARK**

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2 1. I, Gerald Clark, am a plaintiff in the above-entitled action. I make this  
3 declaration of my own personal knowledge and, if called as a witness, I could and  
4 would testify competently to the truth of the matters set forth herein.

5 2. I am a current resident of Orange County, California.

6 3. Before the passage of SB 1384, I regularly attended gun shows,  
7 frequented gun shops, and instructed gun safety courses in these facilities and at  
8 ranges all across the state on behalf of the California Rifle & Pistol Association and  
9 the state of California Hunters' Education Program.

10 4. I am an instructor and work as a volunteer offering training to scouting  
11 groups and gun owners across the state. In these roles, it is important for me to  
12 be able to have personal conversations with students, members, parents, and FFLs  
13 regarding their safety, security, and why their being a gun owner is important to  
14 them. I also discuss issues affecting gun owners in California like pending litigation  
15 and legislation and how groups like CRPA, GOC, SAF, GOA, GOF, and 2ALC are  
16 working to protect their rights. My being able to visit these locations and speak to  
17 gun owners allows valuable opportunities to educate gun owners and to learn from  
18 others while engaging in political speech.

19 5. As an instructor, it is imperative that I share my knowledge about  
20 current law, potential laws that are being considered, and what groups are doing to  
21 stop more gun control against lawful citizens that will not stop crime in the state.

22 6. I also enjoy attending gun shows because these events offer me a  
23 unique opportunity to engage with like-minded people to explore and discuss the  
24 lawful uses of firearms, including self-defense, hunting, target shooting, safety  
25 training, gunsmithing, and general appreciation of our Second Amendment rights. I  
26 also discuss politics, being a gun owner in California, gun safety, and political  
27 actions against lawful gun ownership in California with other attendees and  
28 volunteers.

1           7.     I also visit gun shows and gun shops to purchase firearms and  
2 ammunition, parts for firearms, and materials to help with my training as a gun  
3 owner to be more proficient. As a purchaser of such products, I do not want to have  
4 my speech stifled because I know that the government is tracking my every word. I  
5 want to have open and honest conversations with the FFL about my specific needs  
6 at a gun owner. I think being recorded under SB 1384 would severely limit those  
7 conversations and chill my First Amendment rights.

8           8.     I think that SB 1384 would also chill the speech of my students, gun  
9 owners that I meet in the gun shops, on ranges, and in gun shows because they will  
10 be fearful of saying or doing the wrong things instead of being open to ask about  
11 issues. They will be less likely to congregate in such spaces or even come to  
12 training classes because of constant monitoring by the government like they are  
13 citizen of China instead of citizens of America with constitutional rights.

14           9.     Even when I am not in the market to purchase a firearm or  
15 ammunition, being able to speak to the vendors and FFLs about new products and  
16 pending laws is important to me as an instructor and a gun owner.

17           10.    SB 1384 will diminish my right to engage in otherwise lawful speech,  
18 it will violate my right to have private conversations by recording me and others  
19 without our consent, and it will limit the type of interactions gun owners are willing  
20 to have while being spied upon by the government.

21           11.    If this court were to enjoin SB 1384 enforcement, I would resume my  
22 activities along with other gun owners and FFLs who conduct lawful and highly  
23 regulated businesses.

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I declare under penalty of perjury that the foregoing is true and correct.  
Executed within the United States on December 19, 2023.

*s/ Gerald Clark*  
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Gerald Clark  
Declarant