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13	UNITED STATES DISTRICT COURT	
14	CENTRAL DISTRICT OF CALIFORNIA	
15	ADAM RICHARDS, an individual; JEFFREY VANDERMEULEN, an	Case No.:
16	individual; GERALD CLARK, an	DECLARATION OF GREGG L. BOUSLOG IN SUPPORT OF
17	individual; JESSE HARRIS, an individual; ON TARGET INDOOR	PLAINTIFFS' COMPLAINT FOR
18	SHOOTING RANGE, LLC; GAALSWYK ENTERPRISES, INC.	DECLARATORY AND INJUNCTIVE RELIEF
19	(D/B/A/ SMOKIN' BARREL FIREARMS); GUN OWNERS OF	
20	CALIFORNÍA, INC.; GUN OWNERS OF AMERICA, INC.; GUN OWNERS	
21	FOUNDATION; CALIFORNIA RIFLE & PISTOL ASSOCIATION,	
22	INCORPORATED; and SECOND AMENDMENT FOUNDATION, a	
23	California Corporation,	
24	Plaintiffs,	
25	V.	
26	GAVIN NEWSOM, in his official	
	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.	
		GREGG L. BOUSLOG

## **DECLARATION OF GREGG L. BOUSLOG**

- 1. I, Gregg L. Bouslog, represent plaintiff On Target Indoor Shooting Range, LLC 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 trust of the matters set forth herein.
- 2. I am the Manager and Principle for On Target Indoor Shooting Range, LLC ("On Target") in Orange County, CA. I oversee the day to day activity of the facility including firearms sales, transfers, the shooting range activity, and training.
  - 3. On Target is a brick-and-mortar shop and indoor range.
- 4. On Target specializes in firearms sales (in store and e-sales), firearms transfers, ammunition sales, and training classes.
- 5. As an FFL, On Target has conversations with customers that are confidential in nature regarding their needs to protect themselves and keep them and others safe. We also discuss the types of firearms that are good for their needs and the laws that they must follow as well as pending laws that the state is trying to pass against lawful gun owners.
- 6. On Target supports groups like CRPA and encourages and speaks to customers about why it is so important to join these groups to fight for their rights as gun owners in a state that is constantly trying to restrict their basic constitutional rights.
- 7. On Target offers many training courses for new gun owners and is specifically geared towards making women feel confident in the use of their firearm.
- 8. Twice a month On Target hosts discussion sessions with gun owners to talk about topics that are important to them in a safe and informative environment. Should SB 1384 be implemented, these training groups and discussion groups will be completely recorded by the DOJ. This would stifle the entire purpose of open conversation and many would stop attending.

9. The recording of these sessions would make gun owners less likely to 1 2 ask questions and speak openly for fear of the anti-Second Amendment government 3 watching and listening to them. 10. On Target is also concerned about the additional liability of audio 4 recording these confidential conversations without the other persons giving their 5 consent. This opens On Target up to liability for future legal action that we would 6 not have absent SB 1384. 7 11. Beyond driving the customers and students away, SB 1384 will impact 8 On Target financially by forcing them to purchase costly commercial recording 9 10 equipment that is beyond what is necessary for security of the store. Additional equipment, audio recording, space to store the recordings and wiring of the space 11 are all a huge financial burden. 12 12. If SB 1384 is fully implemented, On Target will see reduced number 13 of gun owners coming to safety classes, reduced number of gun owners willing to 14 15 have open and honest conversations about their firearm and the laws surrounding 16 their possession and use, and will be greatly impacted by the financial cost this bill 17 would mandate on businesses like On Target. I declare under penalty of perjury that the foregoing is true and correct. 18 Executed within the United States on 1980 EMBER 19 19 20 21 22 Declarant 23 24 25 26 27 28