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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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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

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.

Case No.:

**DECLARATION OF GREGG L.
BOUSLOG IN SUPPORT OF
PLAINTIFFS’ COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF**

DECLARATION OF GREGG L. BOUSLOG

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2 1. I, Gregg L. Bouslog, represent plaintiff On Target Indoor Shooting
3 Range, LLC in the above-entitled action. I make this declaration of my own
4 personal knowledge and if called as a witness, I could and would testify
5 competently to the truth of the matters set forth herein.

6 2. I am the Manager and Principle for On Target Indoor Shooting Range,
7 LLC (“On Target”) in Orange County, CA. I oversee the day to day activity of the
8 facility including firearms sales, transfers, the shooting range activity, and training.

9 3. On Target is a brick-and-mortar shop and indoor range.

10 4. On Target specializes in firearms sales (in store and e-sales), firearms
11 transfers, ammunition sales, and training classes.

12 5. As an FFL, On Target has conversations with customers that are
13 confidential in nature regarding their needs to protect themselves and keep them
14 and others safe. We also discuss the types of firearms that are good for their needs
15 and the laws that they must follow as well as pending laws that the state is trying to
16 pass against lawful gun owners.

17 6. On Target supports groups like CRPA and encourages and speaks to
18 customers about why it is so important to join these groups to fight for their rights
19 as gun owners in a state that is constantly trying to restrict their basic constitutional
20 rights.

21 7. On Target offers many training courses for new gun owners and is
22 specifically geared towards making women feel confident in the use of their
23 firearm.

24 8. Twice a month On Target hosts discussion sessions with gun owners to
25 talk about topics that are important to them in a safe and informative environment.
26 Should SB 1384 be implemented, these training groups and discussion groups will
27 be completely recorded by the DOJ. This would stifle the entire purpose of open
28 conversation and many would stop attending.

