

1 C. D. Michel – SBN 144258
Tiffany D. Chevront – SBN 317144
2 MICHEL & ASSOCIATES, P.C.
180 E. Ocean Blvd., Suite 200
3 Long Beach, CA 90802
Telephone: (562) 216-4444
4 Facsimile: (562) 216-4445
cmichel@michellawyers.com
5

6 Attorneys for Plaintiffs Adam Richards, Jeffrey Vandermeulen, Gerald Clark, Jesse
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

9 Donald Kilmer – SBN 179986
Law Offices of Don Kilmer, APC
14085 Silver Ridge Rd.
10 Caldwell, Idaho 83607
Telephone: (408) 264-8489
11 Don@DKLawOffice.com

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 JEFFREY
VANDERMEULEN IN SUPPORT OF
PLAINTIFFS’ COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF**

DECLARATION OF JEFFREY VANDERMEULEN

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

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

6 3. I am a retired police officer and FFL. I operate a retail sales firearms
7 business and e-sales firearms business out of my home. The name of my FFL
8 business is MountainHouse Firearms.

9 4. MountainHouse Firearms is a locally owned small business
10 specializing in the sale of new and use consignment handguns, rifles, shotguns, and
11 accessories.

12 5. I also operate a small aerial ash dispersal business out of my home.

13 6. Through operating my many businesses, I often have private
14 conversations with customers about firearm ownership, family firearm collections,
15 and customers wishing to have the ashes of their loved ones scattered.

16 7. SB 1384 would force me to record all of these transactions regardless
17 of whether they are about the sale of firearms or not. My customers would find this
18 very offensive to have the DOJ listening in on all of their private conversations that
19 they have in confidence with me. Customers will not seek out my services and I
20 fear having to close down my business.

21 8. SB 1384 requires me to post signage on my private residence alerting
22 anyone (customer or friend) who enters my property that they will be recorded. I do
23 not feel comfortable posting this kind of sign on my private property.

24 9. SB 1384 will require me to purchase expensive equipment to comply
25 and pay for the storage of the recordings for one year. The requirements are not for
26 a simple home alarm system, they are for a commercial grade system with specific
27 requirements that are very costly to me as a small business owner.

28 10. I am afraid of additional liability for being sued by someone who

1 misses the posted sign or does not give their consent to be recorded. SB 1384 seems
2 to put me in a bad position where I could be sued by those people over privacy
3 rights.

4 11. Many of my transactions are done on the computer with people outside
5 of California through my e-sales. I am unclear if SB 1384 would force me to point a
6 camera at that screen directly or not. If that is a requirement (because e-sales are
7 transactions) the recording then captures all of those customers' private details on
8 the screen on video. Additionally, those customers have not consented to recording
9 by the DOJ. This will destroy my online business as well.

10 12. As a direct result of SB 1384 being fully implemented, I may be force
11 to give up my business due to the cost to my business and the disapproval of my
12 customers over being recorded.

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

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



Jeffrey Vandermeulen
Declarant