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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 JESSE HARRIS
IN SUPPORT OF PLAINTIFFS’
COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

DECLARATION OF JESSE HARRIS

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2 1. I, Jesse Harris, 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 Siskiyou County, California.

6 3. Before the passage of SB 1384, I regularly attended gun shows and
7 frequented gun shops on behalf of California Rifle & Pistol Association and as a
8 field representative.

9 4. I am a certified firearms instructor and work as an FFL in a tire and
10 tackle shop where I lease space from the owner.

11 5. In these roles, it is important for me to be able to have personal
12 conversations with students, members, customers, and other FFLs regarding their
13 safety, security, and why being a gun owner is important to them. I also discuss
14 issues affecting gun owners in California, like pending litigation and legislation,
15 and how groups like CRPA are working to protect their rights. My being able to
16 visit these locations and speak to gun owners allows valuable opportunities to
17 educate gun owners and to learn from others while engaging in political speech.

18 6. As an instructor, it is imperative that I share my knowledge about
19 current law, potential laws that are being considered, and what groups are doing to
20 stop more gun control against lawful citizens that will not stop crime in the state.
21 Many times, these conversations happen one-on-one with students.

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

1 8. SB 1384 would chill the speech of gun owners that I meet in the gun
2 shops, on ranges, and in gun shows because they will be fearful of saying or doing
3 the wrong things instead of being open to asking about issues. They will be less
4 likely to congregate in such spaces or even come to training classes because of
5 constant monitoring by the government.

6 9. I speak with customers in the shop where I lease space, and the owner
7 of the shop speaks with his own customers as well as his legal counsel while in the
8 shop.

9 10. Under SB 1384, both my conversations regarding firearms and the
10 private conversations of the owner of the shop with customers who have nothing to
11 do with purchasing a firearm would be recorded all the same.

12 11. SB 1384 would negatively impact my business by driving away
13 customers who do not want to have their personal and confidential conversations
14 with me recorded. The recording of customers in the shop who are not purchasing a
15 firearm may also cause the shop owner to lose customers and create tension for my
16 lease agreement and business.

17 12. SB 1384 poses financial difficulties for me because I am a small one-
18 man shop with limited transfers and because I do not own the space where my FFL
19 is located. The lease does not allow me to transform the entire shop (outside of my
20 lease space, which would be required) into a recorded area for the DOJ. The cost
21 alone would ruin my business and would prevent me from continuing as an FFL.

22 13. If this court were to enjoin SB 1384 enforcement, I would resume my
23 activities along with other gun owners and FFLs who conduct lawful and highly
24 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.


Jesse Harris
Declarant