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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
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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 SAMUEL A.
PAREDES IN SUPPORT OF
PLAINTIFFS’ COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF**

DECLARATION OF SAMUEL A. PAREDES

1
2 1. I, Samuel A. Paredes, am the Executive Director of the Gun Owners of
3 California (GOC), a plaintiff in the above-entitled action. I make this declaration of
4 my own 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 a U.S. citizen and resident of California.

7 3. GOC is a California non-stock corporation with its principal place of
8 business in El Dorado County California. GOC is organized and operated as a non-
9 profit membership organization that is exempt from federal income taxes under
10 section 501(c)(4) of the U.S. Internal Revenue Code. GOC was formed in 1975 to
11 preserve and defend the Second Amendment rights of gun owners. GOC has
12 thousands of members and supporters across the state, including firearm dealers.
13 Many of GOC's members and supporters are being and will be irreparably harmed
14 by the implementation of SB 1384, which is being wielded as a political weapon
15 making it financially impossible for many firearms dealers to implement the required
16 video, audio and recording surveillance equipment required to comply with the
17 statute, and which will cause many to go out of business entirely, and will thereby
18 restrict law-abiding Californians' access to constitutionally protected firearms that
19 can only be purchased in California through a federal firearm licensee (FFL).

20 4. In my capacity as Executive Director of GOC, I oversee staff that are
21 in daily contact with members and supporters regarding their concerns, questions,
22 requests, and suggestions on how GOC can best represent their interests.

23 5. Since the passage of SB 1384, an overwhelming concern of our
24 members and supporters, which include licensed California gun dealers, has been
25 that this seemingly vindictive statute would cause gun stores across the state to
26 close down if they cannot afford the type of equipment and technology required to
27 comply with the mandate for 24/7 audio and video recording within their place of
28 business, including the private homes of dealers who operate out of their private

1 residence.

2 6. Additionally, some of GOC's members and supporters similarly will
3 be subjected to and harmed by the requirement that gun dealers record, with
4 sophisticated and expensive audio and video equipment, all activities and
5 conversations within licensed dealer's premises, whether a big box store, ordinary
6 gun store, or home-based firearms business.

7 7. Our members desire and overwhelmingly support GOC's involvement
8 in litigation to protect the rights are being unconstitutionally infringed by SB 1384.

9 8. GOC itself also will be harmed directly by SB1384. GOC has
10 volunteers (called Field Agents) who distribute our organization's literature,
11 including fliers, newsletters, and membership applications, to hundreds of gun
12 stores across California. The dealers typically are thankful to receive the material
13 because patrons frequently visit their stores not only to purchase firearms, but also
14 to discuss firearms related issues. The GOC materials thus provide a convenient
15 way for gun stores to engage with and provide relevant literature to inquiring
16 customers. Often times, this leads to discussion about Second Amendment issues,
17 and to new GOC members joining the organization based on materials obtained
18 from their local gun store. Many GOC members report having initially obtained
19 information about GOC from their local gun store.

20 9. I am concerned that GOC's mission will be harmed by SB 1384.
21 Because many of our new members sign up while visiting California's gun stores,
22 SB 1384's requirement that their every action and word be recorded and handed
23 over to the government for review will chill these prospective members as they seek
24 out educational and other materials related to the Second Amendment and GOC.
25 With California's anti-gun executive branch looking over their shoulder, these
26 prospective members will be less likely to seek out GOC materials, engage in First
27 Amendment discussions about our activities, and sign up for GOC membership.
28 This will lead to GOC having fewer members, and receiving lesser donations, than

1 without SB 1384, and thus affecting our ability to perform our mission to secure
2 and protect the right to keep and bear arms.

3 10. As noted above, GOC represents the interests of many dealers and
4 their customers across the state who are affected by SB 1384's audio and video
5 surveillance requirements. For instance, in addition to big box stores and traditional
6 brick-and-mortar gun stores, other firearm licenses are held by gas stations, law
7 offices, and other types of businesses that also happen to maintain a federal firearm
8 license to sell firearms.

9 11. GOC has heard from multiple members who say that they do not wish
10 to be audio and video recorded when exercising their enumerated constitutional
11 right to keep and bear arms. These members explained that, in addition to
12 purchasing constitutionally protected arms, they visit and patronize California gun
13 dealers to discuss various politics and legal issues, including California's tyrannical
14 anti-gun laws, and to meet other like-minded individuals to discuss Second
15 Amendment activities, firearms, and associated topics.

16 12. However, when learning that all conversations and interactions at the
17 gun counter will be audio and video recorded, this individual stated that SB 1384
18 will chill their speech and association, and that they would self-censor and no
19 longer exercise their rights to the same extent as before, under California's prying
20 eyes.

21 13. These members also explained that they feel as though SB 1384
22 targets them and treats them like a criminal simply for exercising protected Second
23 Amendment rights, and that, out of fear of the government, they no longer would
24 speak freely at these gun stores because they will now be recorded.

25 14. Some of GOC's members and supporters are home-based firearm
26 dealers, and do not wish to have their homes under constant 24/7 government
27 surveillance simply for conducting business, from time to time, from home.

28 15. GOC has heard from members who reported they conduct business at

1 their kitchen table, including completing and maintaining paperwork, and when
2 filling out the required forms to conduct firearms transactions with customers, as
3 their home is their licensed premises for firearm purchase purposes.

4 16. These members do not want to 1) install video and audio recording
5 devices, mandated by the State; 2) to exercise constitutionally protected rights
6 under the prying eye of the government; 3) be required to pay for these recording
7 devices; 4) be forced to put up signage around their home informing visitors that
8 they are being recorded, and 5) be subjected, in their own home, to 24/7
9 government surveillance.

10 17. These dealers expressed outrage that SB 1384 requires them to record
11 inside their home on a continual basis, even on days and at times when they do not
12 conduct any business, as they only have specific hours during which they conduct
13 firearms transactions.

14 18. These FFLS are afraid that their businesses may have to be shut down
15 because 1) they are unwilling to record all goings on within their own home at all
16 times of the day and night, no matter what they are doing, and not only within their
17 kitchen but also at all entrances and exits of their home (and perhaps other places),
18 and 2) they likely cannot afford the expensive equipment to record audio and video
19 all day, every day.

20 19. Some of these members have no intent to comply with SB 1384, as
21 they flatly refuse to install the government's mandated surveillance equipment
22 within their own home.

23 20. Protection of the constitutional rights advanced in this litigation is
24 germane to GOC's mission, which includes the effort to preserve and protect the
25 Second Amendment and the rights of Americans to keep and bear arms, including
26 against overreach by the legislative and executive branch of California government
27 and anti-gun bureaucrats. GOC routinely litigates cases in California on behalf of
28 its members and supporters and is capable of fully and faithfully representing the

1 interests of its members and supporters without participation by each of the
2 individuals and entities.

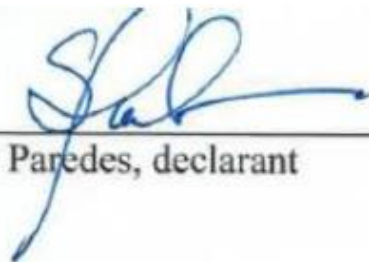
3 21. The magnitude and scope of the harms alleged above to GOC's
4 members and supporters, while already real, concrete, and irreparable, are still yet
5 to be fully realized, as implementation of SB 1384 will occur on January 1, 2024,
6 when the video and audio surveillance requirements go into effect.

7 22. In different ways and to varying degrees, each of our members and
8 supporters will be irreparably harmed once this law is fully implemented. Some
9 will be subjected to ever encroaching, illegal, and unconstitutional infringements of
10 their right to keep and bear arms, and some will have to dramatically change the
11 way they do business, including the elimination of assembling and speaking with
12 like-minded individuals about protected rights while shopping at gun stores, having
13 to install a government monitor in their homes invading all aspects of their private
14 lives, and having to waive numerous other constitutional rights simply to exercise
15 their Second Amendment rights.

16 23. If SB 1384's 24/7 video and audio recording requirement is not
17 enjoined now, our members' and supporters' constitutional rights will be
18 significantly curtailed, and GOC, as an organization, will be impeded in fulfilling
19 its mission.

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

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Sam Paredes, declarant