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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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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.: 8:23-cv-02413 JVS (KESx)

**DECLARATION OF ADAM  
RICHARDS IN SUPPORT OF  
PLAINTIFFS’ APPLICATION FOR  
TEMPORARY RESTRAINING  
ORDER AND ISSUANCE OF  
PRELIMINARY INJUNCTION**

Hearing Date: TBD  
Hearing Time: TBD  
Courtroom: 10C  
Judge: Hon. James V. Selna

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**DECLARATION OF ADAM RICHARDS**

1. I, Adam Richards, am a plaintiff 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 truth of the matters set forth herein.

2. I am a current resident of El Dorado County, California.

3. I am a home-based FFL and an attorney. I work out of my home doing legal work approximately 50% of the time.

4. In my home office, I conduct legal work and operate my FFL business.

5. I was forced to become a home-based FFL because the City of Sacramento (where his law office is located) made the permitting process for becoming an established commercial FFL so expensive that I could not afford to have the FFL license in the same place as my main law office. Rather than waste money on permitting with the city, I decided to open my FFL business in my home.

6. I have a separate structure at my home, which houses my home office.

7. The work I do for my legal practice includes telephone calls with clients, opposing counsel, law enforcement, and others. These are often attorney-client privileged conversations, and they are always private and not intended for others to hear.

8. While working on legal matters in my home office, I may also have confidential client files open and documents spread out that could be picked up on a recording device that would be located in that space. This would be a breach of client confidentiality.

9. I also have a family with younger children. Many times, my children will come to see me in the home office before school or before bed in the evenings. As younger children, they can sometimes be partially dressed when they visit. I could not imagine exposing my children in their most intimate times with a parent to government recording.

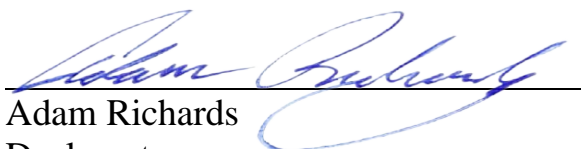
10. Should AB 1384 be implemented, Mr. Richards will be forced to

1 include highly intrusive recording devices into my home and home office, alert all  
2 of my clients, family, friends, neighbors, etc., that they are being recorded, and  
3 then hope that I do not get sued for recording someone without consent.

4 11. If this court were to enjoin SB 1384 enforcement, I would resume my  
5 activities along with other gun owners and FFLs who conduct lawful and highly  
6 regulated businesses.

7  
8 I declare under penalty of perjury that the foregoing is true and correct.  
9 Executed within the United States on December 21, 2023.

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Adam Richards  
Declarant

**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *Richards, et al. v. Newsom, et al.*  
Case No.: 8:23-cv-02413 JVS (KESx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**DECLARATION OF ADAM RICHARDS IN SUPPORT OF PLAINTIFFS’  
APPLICATION FOR TEMPORARY RESTRAINING ORDER AND  
ISSUANCE OF PRELIMINARY INJUNCTION**

on the following parties by the following means:

Robert Bonta, California Attorney General  
Office of the Attorney General  
300 South Spring Street  
Los Angeles, CA 90013-1230

Governor Gavin Newsom  
1021 O Street, Suite 9000  
Sacramento, CA 95814

  X   (BY OVERNIGHT MAIL) As follows: I am “readily familiar” with the firm’s practice of collection and processing correspondence for overnight delivery by UPS/FED-EX. Under the practice it would be deposited with a facility regularly maintained by UPS/FED-EX for receipt on the same day in the ordinary course of business. Such envelope was sealed and placed for collection and delivery by UPS/FED-EX with delivery fees paid or provided for in accordance with ordinary business practices.

John D. Echeverria  
Deputy Attorney General  
[john.echeverria@doj.ca.gov](mailto:john.echeverria@doj.ca.gov)  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004

  X   (BY ELECTRONIC MAIL) As follows: I served a true and correct copy by electronic transmission. Said transmission was reported and completed without error.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed December 21, 2023.

  
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Laura Palmerin