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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
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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 GREGG L.
BOUSLOG 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

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.

1 9. The recording of these sessions would make gun owners less likely to
2 ask questions and speak openly for fear of the anti-Second Amendment government
3 watching and listening to them.


4 10. On Target is also concerned about the additional liability of audio
5 recording these confidential conversations without the other persons giving their
6 consent. This opens On Target up to liability for future legal action that we would
7 not have absent SB 1384.

8 11. Beyond driving the customers and students away, SB 1384 will impact
9 On Target financially by forcing them to purchase costly commercial recording
10 equipment that is beyond what is necessary for security of the store. Additional
11 equipment, audio recording, space to store the recordings and wiring of the space
12 are all a huge financial burden.

13 12. If SB 1384 is fully implemented, On Target will see reduced number
14 of gun owners coming to safety classes, reduced number of gun owners willing to
15 have open and honest conversations about their firearm and the laws surrounding
16 their possession and use, and will be greatly impacted by the financial cost this bill
17 would mandate on businesses like On Target.

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

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Gregg L. Bouslog
Declarant

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

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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 GREGG L. BOUSLOG 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
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.



Laura Palmerin