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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 JEFFREY
VANDERMEULEN 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 JEFFREY VANDERMEULEN

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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 21, 2023.

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Jeffrey Vandermeulen
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 JEFFREY VANDERMEULEN 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