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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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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

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

**DECLARATION OF SAMUEL A.  
PAREDES 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 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.

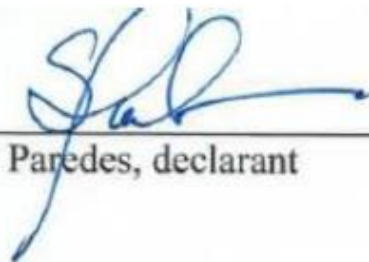
3 21. The magnitude and scope of the harms alleged above to GOC's  
4 members and supporters, while already real, concrete, and irreparable, are still yet  
5 to be fully realized, as implementation of SB 1384 will occur on January 1, 2024,  
6 when the video and audio surveillance requirements go into 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 21, 2023.

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Sam Paredes, 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 SAMUEL A. PAREDES 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