

1 C. D. Michel – SBN 144258
Tiffany D. Chevront – SBN 317144
2 MICHEL & ASSOCIATES, P.C.
180 E. Ocean Blvd., Suite 200
3 Long Beach, CA 90802
Telephone: (562) 216-4444
4 Facsimile: (562) 216-4445
cmichel@michellawyers.com
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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
8

9 Donald Kilmer – SBN 179986
Law Offices of Don Kilmer, APC
14085 Silver Ridge Rd.
10 Caldwell, Idaho 83607
Telephone: (408) 264-8489
11 Don@DKLawOffice.com

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 TIFFANY D.
CHEUVRONT 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 TIFFANY D. CHEUVRONT

1. I, Tiffany D. Chevront, am an attorney at the law firm Michel & Associates, P.C., attorneys of record for Plaintiffs in this action. I am licensed to practice law before the United States District Court for the Central District of California. I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, could and would testify competently thereto.

2. On December 21, 2023, I called Robert Meyerhoff, Deputy Attorney General, at (213) 269-6177 and left a message asking for someone at the Department of Justice who could determine the attorney for the case.

3. Shortly after, I called John Echeverria, Deputy Attorney General, at (415) 510-3479 and Mr. Echeverria asked that our office send courtesy copies of the Complaint and Application documents to him by email. Mr. Echeverria stated that he would have to circulate the case documents within the Department of Justice to see who the handling attorney would be.

4. The Complaint, this Application, the accompanying Memorandum of Points and Authorities, the declarations of Adam Richards, Jeffrey Vandermeulen, Gerald Clark, Jesse Harris, Gregg Bouslog, Robert Gaalswyk, Samuel Paredes, Richard Minnich, Erich Pratt, and Alan Gottlieb, and the Proposed Order to Show Cause for Preliminary Injunction and Temporary Restraining Order have been sent by my office to Mr. Echeverria by email at John.Echeverria@doj.ca.gov. The email notified Mr. Echeverria that any opposition must be filed not later than 24 hours after such service.

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

s/ Tiffany D. Chevront
Tiffany D. Chevront
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

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 TIFFANY D. CHEUVRONT 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.

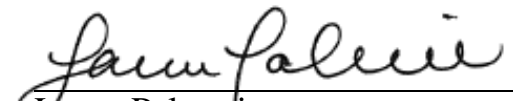
John D. Echeverria
Deputy Attorney General
john.echeverria@doj.ca.gov
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004

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