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 8 capacity as Attorney General of the State of
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9
 10 IN THE UNITED STATES DISTRICT COURT
 11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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 14 **JUNIOR SPORTS MAGAZINES**
INC. et al.,
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 Plaintiffs,
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 v.
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ROB BONTA, in his official capacity
as Attorney General of the State of
 18 **California et al.,**
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 Defendants.
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2:22-cv-04663-CAS-JC

ANSWER TO COMPLAINT

Judge: Hon. Christina M. Snyder
Trial Date: None set
Action Filed: July 8, 2022

1 Defendant Attorney General Rob Bonta, in his official capacity, hereby
2 responds to Plaintiffs' Complaint for Declaratory and Injunctive Relief, ECF No. 1
3 (Complaint), as follows.

4 **ANSWER TO ALLEGATIONS IN "JURISDICTION AND VENUE"**

5 1. Paragraph 1 of the Complaint consists of legal argument and/or
6 conclusions that do not require admission or denial. With respect to any citation or
7 quotation of a legal authority, that authority speaks for itself. Defendant admits that
8 this Court has subject matter jurisdiction. To the extent admission or denial of the
9 other allegations of the paragraph is required, Defendant denies all allegations.

10 2. Paragraph 2 of the Complaint consists of legal argument and/or
11 conclusions that do not require admission or denial. With respect to any citation or
12 quotation of a legal authority, that authority speaks for itself. To the extent
13 admission or denial is required, Defendant denies all allegations.

14 3. Paragraph 3 of the Complaint consists of legal argument and/or
15 conclusions that do not require admission or denial. With respect to any citation or
16 quotation of a legal authority, that authority speaks for itself. Defendant admits that
17 venue is proper. To the extent admission or denial of the other allegations of the
18 paragraph is required, Defendant denies all allegations.

19 **ANSWER TO ALLEGATIONS IN "INTRODUCTION"**

20 4. Paragraph 4 of the Complaint consists of legal argument and/or
21 conclusions that do not require admission or denial. With respect to any citation or
22 quotation of a legal authority, that authority speaks for itself. To the extent
23 admission or denial is required, Defendant denies all allegations.

24 5. Paragraph 5 of the Complaint consists of legal argument and/or
25 conclusions that do not require admission or denial. With respect to any citation or
26 quotation of a legal authority, that authority speaks for itself. To the extent
27 admission or denial is required, Defendant denies all allegations.

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1 6. Paragraph 6 of the Complaint consists of legal argument and/or
2 conclusions that do not require admission or denial. With respect to any citation or
3 quotation of a legal authority, that authority speaks for itself. To the extent
4 admission or denial is required, Defendant denies all allegations.

5 7. Paragraph 7 of the Complaint consists of legal argument and/or
6 conclusions that do not require admission or denial. With respect to any citation or
7 quotation of a legal authority, that authority speaks for itself. To the extent
8 admission or denial is required, Defendant denies all allegations.

9 8. Paragraph 8 of the Complaint consists of legal argument and/or
10 conclusions that do not require admission or denial. With respect to any citation or
11 quotation of a legal authority, that authority speaks for itself. To the extent
12 admission or denial is required, Defendant denies all allegations.

13 9. Paragraph 9 of the Complaint consists of legal argument and/or
14 conclusions that do not require admission or denial. With respect to any citation or
15 quotation of a legal authority, that authority speaks for itself. To the extent
16 admission or denial is required, Defendant denies all allegations.

17 10. Paragraph 10 of the Complaint consists of legal argument and/or
18 conclusions that do not require admission or denial. With respect to any citation or
19 quotation of a legal authority, that authority speaks for itself. To the extent
20 admission or denial is required, Defendant denies all allegations.

21 11. Paragraph 11 of the Complaint consists of legal argument and/or
22 conclusions that do not require admission or denial. With respect to any citation or
23 quotation of a legal authority, that authority speaks for itself. To the extent
24 admission or denial is required, Defendant denies all allegations.

25 12. Paragraph 12 of the Complaint consists of legal argument and/or
26 conclusions that do not require admission or denial. With respect to any citation or
27 quotation of a legal authority, that authority speaks for itself. To the extent
28 admission or denial is required, Defendant denies all allegations.

ANSWER TO ALLEGATIONS IN “PARTIES”

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2 13. In response to the allegations in paragraph 13 of the Complaint,
3 Defendant lacks knowledge or information sufficient to form a belief as to the truth
4 of the allegations and, therefore, denies them.

5 14. In response to the allegations in paragraph 14 of the Complaint,
6 Defendant lacks knowledge or information sufficient to form a belief as to the truth
7 of the allegations and, therefore, denies them.

8 15. In response to the allegations in paragraph 15 of the Complaint,
9 Defendant lacks knowledge or information sufficient to form a belief as to the truth
10 of the allegations and, therefore, denies them.

11 16. In response to the allegations in paragraph 16 of the Complaint,
12 Defendant lacks knowledge or information sufficient to form a belief as to the truth
13 of the allegations and, therefore, denies them.

14 17. In response to the allegations in paragraph 17 of the Complaint,
15 Defendant lacks knowledge or information sufficient to form a belief as to the truth
16 of the allegations and, therefore, denies them.

17 18. In response to the allegations in paragraph 18 of the Complaint,
18 Defendant lacks knowledge or information sufficient to form a belief as to the truth
19 of the allegations and, therefore, denies them.

20 19. In response to the allegations in paragraph 19 of the Complaint,
21 Defendant lacks knowledge or information sufficient to form a belief as to the truth
22 of the allegations and, therefore, denies them.

23 20. In response to the allegations in paragraph 20 of the Complaint,
24 Defendant lacks knowledge or information sufficient to form a belief as to the truth
25 of the allegations and, therefore, denies them.

26 21. In response to the allegations in paragraph 21 of the Complaint,
27 Defendant admits that he is the Attorney General of the State of California.
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1 Defendant admits that, as the Attorney General, under section 13 of Article V of the
2 California Constitution, he is the “chief law officer of the State,” and has the duty
3 “to see that the laws of the State are uniformly and adequately enforced.” Cal.
4 Const., art. V, § 13. Defendant admits that, as Attorney General, he maintains an
5 office in Los Angeles, California. The remaining allegations in paragraph 21
6 consist of legal argument, and/or conclusions that do not require admission or
7 denial. With respect to any citation or quotation of a legal authority, that authority
8 speaks for itself. To the extent admission or denial is required, Defendant denies all
9 remaining allegations.

10 22. In response to the allegations in the body of paragraph 22 of the
11 Complaint, Defendant lacks knowledge or information sufficient to form a belief as
12 to the truth of the allegations and, therefore, denies them. In response to the
13 allegations in footnote 1 of the Complaint, Defendant lacks knowledge or
14 information sufficient to form a believe as to the truth of the allegations, and
15 therefore denies, that, “To Plaintiffs’ knowledge no such actor as yet filed such an
16 action, but Plaintiffs will immediately amend or move to amend this complaint to
17 show the true names and capacities of such actors should they do so.” The
18 remaining allegations in footnote 1 consist of legal argument, and/or conclusions
19 that do not require admission or denial. With respect to any citation or quotation of
20 a legal authority, that authority speaks for itself. To the extent admission or denial
21 is required, Defendant denies all remaining allegations.

22 **ANSWER TO ALLEGATIONS IN “FACTUAL ALLEGATIONS”**

23 23. Paragraph 23 of the Complaint consists of legal argument and/or
24 conclusions that do not require admission or denial. With respect to any citation or
25 quotation of a legal authority, that authority speaks for itself. To the extent
26 admission or denial is required, Defendant denies all allegations.

27 24. Paragraph 24 of the Complaint consists of legal argument and/or
28 conclusions that do not require admission or denial. With respect to any citation or
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1 quotation of a legal authority, that authority speaks for itself. To the extent
2 admission or denial is required, Defendant denies all allegations.

3 25. Paragraph 25 of the Complaint consists of legal argument and/or
4 conclusions that do not require admission or denial. With respect to any citation or
5 quotation of a legal authority, that authority speaks for itself. To the extent
6 admission or denial is required, Defendant denies all allegations.

7 26. Paragraph 26 of the Complaint consists of legal argument and/or
8 conclusions that do not require admission or denial. With respect to any citation or
9 quotation of a legal authority, that authority speaks for itself. To the extent
10 admission or denial is required, Defendant denies all allegations.

11 27. Paragraph 27 of the Complaint consists of legal argument and/or
12 conclusions that do not require admission or denial. With respect to any citation or
13 quotation of a legal authority, that authority speaks for itself. To the extent
14 admission or denial is required, Defendant denies all allegations.

15 28. Paragraph 28 of the Complaint consists of legal argument and/or
16 conclusions that do not require admission or denial. With respect to any citation or
17 quotation of a legal authority, that authority speaks for itself. To the extent
18 admission or denial is required, Defendant denies all allegations.

19 29. Paragraph 29 and footnote 2 of the Complaint consist of legal argument
20 and/or conclusions that do not require admission or denial. With respect to any
21 citation or quotation of a legal authority, that authority speaks for itself. To the
22 extent admission or denial is required, Defendant denies all allegations.

23 30. Paragraph 30 of the Complaint consists of legal argument and/or
24 conclusions that do not require admission or denial. With respect to any citation or
25 quotation of a legal authority, that authority speaks for itself. To the extent
26 admission or denial is required, Defendant denies all allegations.

27 31. Paragraph 31 of the Complaint consists of legal argument and/or
28 conclusions that do not require admission or denial. With respect to any citation or

1 quotation of a legal authority, that authority speaks for itself. To the extent
2 admission or denial is required, Defendant denies all allegations.

3 32. Paragraph 32 of the Complaint consists of legal argument and/or
4 conclusions that do not require admission or denial. With respect to any citation or
5 quotation of a legal authority, that authority speaks for itself. To the extent
6 admission or denial is required, Defendant denies all allegations.

7 33. Paragraph 33 of the Complaint consists of legal argument and/or
8 conclusions that do not require admission or denial. With respect to any citation or
9 quotation of a legal authority, that authority speaks for itself. To the extent
10 admission or denial is required, Defendant denies all allegations.

11 34. Paragraph 34 of the Complaint consists of legal argument and/or
12 conclusions that do not require admission or denial. With respect to any citation or
13 quotation of a legal authority, that authority speaks for itself. To the extent
14 admission or denial is required, Defendant denies all allegations.

15 35. Paragraph 35 of the Complaint consists of legal argument and/or
16 conclusions that do not require admission or denial. With respect to any citation or
17 quotation of a legal authority, that authority speaks for itself. To the extent
18 admission or denial is required, Defendant denies all allegations.

19 36. Paragraph 36 of the Complaint consists of legal argument and/or
20 conclusions that do not require admission or denial. With respect to any citation or
21 quotation of a legal authority, that authority speaks for itself. To the extent
22 admission or denial is required, Defendant denies all allegations.

23 37. Paragraph 37 of the Complaint consists of legal argument and/or
24 conclusions that do not require admission or denial. With respect to any citation or
25 quotation of a legal authority, that authority speaks for itself. To the extent
26 admission or denial is required, Defendant denies all allegations.

27 38. Paragraph 38 of the Complaint consists of legal argument and/or
28 conclusions that do not require admission or denial. With respect to any citation or

1 quotation of a legal authority, that authority speaks for itself. To the extent
2 admission or denial is required, Defendant denies all allegations.

3 39. Paragraph 39 of the Complaint consists of legal argument and/or
4 conclusions that do not require admission or denial. With respect to any citation or
5 quotation of a legal authority, that authority speaks for itself. To the extent
6 admission or denial is required, Defendant denies all allegations.

7 40. Paragraph 40 of the Complaint consists of legal argument and/or
8 conclusions that do not require admission or denial. With respect to any citation or
9 quotation of a legal authority, that authority speaks for itself. To the extent
10 admission or denial is required, Defendant denies all allegations.

11 41. Paragraph 41 of the Complaint consists of legal argument and/or
12 conclusions that do not require admission or denial. With respect to any citation or
13 quotation of a legal authority, that authority speaks for itself. To the extent
14 admission or denial is required, Defendant denies all allegations.

15 42. In response to paragraph 42 of the Complaint, Defendant admits that
16 Assembly member Rebecca Bauer-Kahan introduced AB 2571 on or about
17 February 18, 2022, and that, according to the legislative history report cited in
18 paragraph 42, the bill was sponsored by Governor Gavin Newsom. Defendant
19 denies all remaining allegations.

20 43. In response to paragraph 43 of the Complaint, Defendant admits that AB
21 2571 passed both houses of the California Legislature. Defendant admits that AB
22 2571 was presented to Governor Gavin Newsom at or around 2:30 p.m. on June 30,
23 2022. Defendant denies all remaining allegations.

24 44. In response to paragraph 44 of the Complaint, Defendant admits that
25 Governor Newsom approved AB 2571 on June 20, 2022. Defendant denies all
26 remaining allegations.

27 45. Defendant admits the allegations in paragraph 45 of the Complaint.
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1 46. The body of Paragraph 46 of the Complaint consists of legal argument
2 and/or conclusions that do not require admission or denial. With respect to any
3 citation or quotation of a legal authority, that authority speaks for itself. To the
4 extent admission or denial is required, Defendant denies all allegations. In response
5 to footnote 3 of the Complaint, Defendant lacks knowledge or information
6 sufficient to form a belief as to the truth of the allegations and, therefore, denies
7 them.

8 47. Paragraph 47 of the Complaint consists of legal argument and/or
9 conclusions that do not require admission or denial. With respect to any citation or
10 quotation of a legal authority, that authority speaks for itself. To the extent
11 admission or denial is required, Defendant denies all allegations.

12 48. Paragraph 48 of the Complaint consists of legal argument and/or
13 conclusions that do not require admission or denial. With respect to any citation or
14 quotation of a legal authority, that authority speaks for itself. To the extent
15 admission or denial is required, Defendant denies all allegations.

16 49. Paragraph 49 of the Complaint consists of legal argument and/or
17 conclusions that do not require admission or denial. With respect to any citation or
18 quotation of a legal authority, that authority speaks for itself. To the extent
19 admission or denial is required, Defendant denies all allegations.

20 50. Paragraph 50 of the Complaint consists of legal argument and/or
21 conclusions that do not require admission or denial. With respect to any citation or
22 quotation of a legal authority, that authority speaks for itself. To the extent
23 admission or denial is required, Defendant denies all allegations.

24 51. Paragraph 51 of the Complaint consists of legal argument and/or
25 conclusions that do not require admission or denial. With respect to any citation or
26 quotation of a legal authority or legislative history report, that authority speaks for
27 itself. To the extent admission or denial is required, Defendant denies all
28 allegations.

1 52. Paragraph 52 of the Complaint consists of legal argument and/or
2 conclusions that do not require admission or denial. With respect to any citation or
3 quotation of a legal authority, that authority speaks for itself. To the extent
4 admission or denial is required, Defendant denies all allegations.

5 53. Paragraph 53 of the Complaint consists of legal argument and/or
6 conclusions that do not require admission or denial. With respect to any citation or
7 quotation of a legal authority, that authority speaks for itself. To the extent
8 admission or denial is required, Defendant denies all allegations.

9 54. Paragraph 54 of the Complaint consists of legal argument and/or
10 conclusions that do not require admission or denial. With respect to any citation or
11 quotation of a legal authority, that authority speaks for itself. To the extent
12 admission or denial is required, Defendant denies all allegations.

13 55. Paragraph 55 of the Complaint consists of legal argument and/or
14 conclusions that do not require admission or denial. With respect to any citation or
15 quotation of a legal authority, that authority speaks for itself. To the extent
16 admission or denial is required, Defendant denies all allegations.

17 56. Paragraph 56 of the Complaint consists of legal argument and/or
18 conclusions that do not require admission or denial. With respect to any citation or
19 quotation of a legal authority, that authority speaks for itself. To the extent
20 admission or denial is required, Defendant denies all allegations.

21 57. Paragraph 57 of the Complaint consists of legal argument and/or
22 conclusions that do not require admission or denial. With respect to any citation or
23 quotation of a legal authority, that authority speaks for itself. To the extent
24 admission or denial is required, Defendant denies all allegations.

25 58. Paragraph 58 of the Complaint consists of legal argument and/or
26 conclusions that do not require admission or denial. With respect to any citation or
27 quotation of a legal authority, that authority speaks for itself. To the extent
28 admission or denial is required, Defendant denies all allegations.

1 59. Paragraph 59 of the Complaint consists of legal argument and/or
2 conclusions that do not require admission or denial. With respect to any citation or
3 quotation of a legal authority, that authority speaks for itself. To the extent
4 admission or denial is required, Defendant denies all allegations.

5 60. Paragraph 60 of the Complaint consists of legal argument and/or
6 conclusions that do not require admission or denial. With respect to any citation or
7 quotation of a legal authority, that authority speaks for itself. To the extent
8 admission or denial is required, Defendant denies all allegations.

9 61. Paragraph 61 of the Complaint consists of legal argument and/or
10 conclusions that do not require admission or denial. With respect to any citation or
11 quotation of a legal authority, that authority speaks for itself. To the extent
12 admission or denial is required, Defendant denies all allegations.

13 62. Paragraph 62 of the Complaint consists of legal argument and/or
14 conclusions that do not require admission or denial. With respect to any citation or
15 quotation of a legal authority, that authority speaks for itself. To the extent
16 admission or denial is required, Defendant denies all allegations.

17 63. Paragraph 63 of the Complaint consists of legal argument and/or
18 conclusions that do not require admission or denial. With respect to any citation or
19 quotation of a legal authority, that authority speaks for itself. To the extent
20 admission or denial is required, Defendant denies all allegations.

21 64. Paragraph 64 of the Complaint consists of legal argument and/or
22 conclusions that do not require admission or denial. With respect to any citation or
23 quotation of a legal authority, that authority speaks for itself. To the extent
24 admission or denial is required, Defendant denies all allegations.

25 65. In response to the allegations in paragraph 65 of the Complaint,
26 Defendant lacks knowledge or information sufficient to form a belief as to the truth
27 of the allegations and, therefore, denies them.

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1 66. In response to the allegations in paragraph 66 of the Complaint,
2 Defendant lacks knowledge or information sufficient to form a belief as to the truth
3 of the allegations and, therefore, denies them.

4 67. In response to the allegations in paragraph 67 of the Complaint,
5 Defendant lacks knowledge or information sufficient to form a belief as to the truth
6 of the allegations and, therefore, denies them.

7 68. In response to the allegations in paragraph 68 of the Complaint,
8 Defendant lacks knowledge or information sufficient to form a belief as to the truth
9 of the allegations and, therefore, denies them.

10 69. In response to the allegations in paragraph 69 of the Complaint,
11 Defendant lacks knowledge or information sufficient to form a belief as to the truth
12 of the allegations and, therefore, denies them.

13 70. In response to the allegations in paragraph 70 of the Complaint,
14 Defendant lacks knowledge or information sufficient to form a belief as to the truth
15 of the allegations and, therefore, denies them.

16 71. In response to the allegations in paragraph 71 of the Complaint,
17 Defendant lacks knowledge or information sufficient to form a belief as to the truth
18 of the allegations and, therefore, denies them.

19 72. In response to the allegations in paragraph 72 of the Complaint,
20 Defendant lacks knowledge or information sufficient to form a belief as to the truth
21 of the allegations and, therefore, denies them.

22 73. In response to the allegations in paragraph 73 of the Complaint,
23 Defendant lacks knowledge or information sufficient to form a belief as to the truth
24 of the allegations and, therefore, denies them.

25 74. In response to the allegations in paragraph 74 of the Complaint,
26 Defendant lacks knowledge or information sufficient to form a belief as to the truth
27 of the allegations and, therefore, denies them.

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1 75. In response to the allegations in paragraph 75 of the Complaint,
2 Defendant lacks knowledge or information sufficient to form a belief as to the truth
3 of the allegations and, therefore, denies them.

4 76. In response to the allegations in paragraph 76 of the Complaint,
5 Defendant lacks knowledge or information sufficient to form a belief as to the truth
6 of the allegations and, therefore, denies them.

7 77. In response to the allegations in paragraph 77 of the Complaint,
8 Defendant lacks knowledge or information sufficient to form a belief as to the truth
9 of the allegations and, therefore, denies them.

10 78. In response to the allegations in paragraph 78 of the Complaint,
11 Defendant lacks knowledge or information sufficient to form a belief as to the truth
12 of the allegations and, therefore, denies them.

13 79. In response to the allegations in paragraph 79 of the Complaint,
14 Defendant lacks knowledge or information sufficient to form a belief as to the truth
15 of the allegations and, therefore, denies them.

16 80. In response to the allegations in paragraph 80 of the Complaint,
17 Defendant lacks knowledge or information sufficient to form a belief as to the truth
18 of the allegations and, therefore, denies them.

19 81. In response to the allegations in paragraph 81 of the Complaint,
20 Defendant lacks knowledge or information sufficient to form a belief as to the truth
21 of the allegations and, therefore, denies them.

22 82. In response to the allegations in paragraph 82 of the Complaint,
23 Defendant lacks knowledge or information sufficient to form a belief as to the truth
24 of the allegations and, therefore, denies them.

25 83. In response to the allegations in paragraph 83 of the Complaint,
26 Defendant lacks knowledge or information sufficient to form a belief as to the truth
27 of the allegations and, therefore, denies them.

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1 84. In response to the allegations in paragraph 84 of the Complaint,
2 Defendant lacks knowledge or information sufficient to form a belief as to the truth
3 of the allegations and, therefore, denies them.

4 85. In response to the allegations in paragraph 85 of the Complaint,
5 Defendant lacks knowledge or information sufficient to form a belief as to the truth
6 of the allegations and, therefore, denies them.

7 86. In response to the allegations in paragraph 86 of the Complaint,
8 Defendant lacks knowledge or information sufficient to form a belief as to the truth
9 of the allegations and, therefore, denies them.

10 87. In response to the allegations in paragraph 87 of the Complaint,
11 Defendant lacks knowledge or information sufficient to form a belief as to the truth
12 of the allegations and, therefore, denies them.

13 88. Paragraph 88 of the Complaint consists of legal argument and/or
14 conclusions that do not require admission or denial. With respect to any citation or
15 quotation of a legal authority, that authority speaks for itself. To the extent
16 admission or denial is required, Defendant denies all allegations.

17 89. In response to the allegations in paragraph 89 of the Complaint,
18 Defendant lacks knowledge or information sufficient to form a belief as to the truth
19 of the allegations and, therefore, denies them.

20 90. In response to the allegations in paragraph 90 of the Complaint,
21 Defendant lacks knowledge or information sufficient to form a belief as to the truth
22 of the allegations and, therefore, denies them.

23 91. In response to the allegations in paragraph 91 of the Complaint,
24 Defendant lacks knowledge or information sufficient to form a belief as to the truth
25 of the allegations and, therefore, denies them.

26 92. In response to the allegations in paragraph 92 of the Complaint,
27 Defendant lacks knowledge or information sufficient to form a belief as to the truth
28 of the allegations and, therefore, denies them.

1 93. In response to the allegations in paragraph 93 of the Complaint,
2 Defendant lacks knowledge or information sufficient to form a belief as to the truth
3 of the allegations and, therefore, denies them.

4 94. In response to the allegations in paragraph 94 of the Complaint,
5 Defendant lacks knowledge or information sufficient to form a belief as to the truth
6 of the allegations and, therefore, denies them.

7 95. In response to the allegations in paragraph 95 of the Complaint,
8 Defendant lacks knowledge or information sufficient to form a belief as to the truth
9 of the allegations and, therefore, denies them.

10 96. In response to the allegations in paragraph 96 of the Complaint,
11 Defendant lacks knowledge or information sufficient to form a belief as to the truth
12 of the allegations and, therefore, denies them.

13 97. Paragraph 97 of the Complaint consists of legal argument and/or
14 conclusions that do not require admission or denial. With respect to any citation or
15 quotation of a legal authority, that authority speaks for itself. To the extent
16 admission or denial is required, Defendant denies all allegations. As to the
17 remaining allegations, Defendant lacks knowledge or information sufficient to form
18 a belief as to the truth of the allegations and, therefore, denies them.

19 98. Paragraph 98 of the Complaint consists of legal argument and/or
20 conclusions that do not require admission or denial. With respect to any citation or
21 quotation of a legal authority, that authority speaks for itself. To the extent
22 admission or denial is required, Defendant denies all allegations.

23 99. Paragraph 99 of the Complaint consists of legal argument and/or
24 conclusions that do not require admission or denial. With respect to any citation or
25 quotation of a legal authority, that authority speaks for itself. To the extent
26 admission or denial is required, Defendant denies all allegations.

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1 100. In response to paragraph 100 of the Complaint, the quoted legislative
2 history report speaks for itself. To the extent admission or denial is required,
3 Defendant denies all allegations.

4 101. In response to paragraph 101 of the Complaint, the quoted legislative
5 history report speaks for itself. To the extent admission or denial is required,
6 Defendant denies all allegations.

7 102. In response to paragraph 102 of the Complaint, the quoted article speaks
8 for itself. To the extent admission or denial is required, Defendant denies all
9 allegations.

10 103. In response to paragraph 100 of the Complaint, the quoted legislative
11 history report speaks for itself. To the extent admission or denial is required,
12 Defendant denies all allegations.

13 104. Paragraph 104 consists of legal argument and/or conclusions that do not
14 require admission or denial. With respect to any citation or quotation of a legal
15 authority, that authority speaks for itself. To the extent admission or denial is
16 required, Defendant denies all allegations.

17 105. In response to paragraph 105 of the Complaint, the quoted video speaks
18 for itself. To the extent admission or denial is required, Defendant denies all
19 allegations.

20 106. In response to the allegations in paragraph 106 of the Complaint,
21 Defendant lacks knowledge or information sufficient to form a belief as to the truth
22 of the allegations, and therefore denies, that: “In his recorded statement, Governor
23 Newsom reproduced and displayed advertising from WEE1 Tactical of their JR-15,
24 *id.*—the very advertising that seemingly sparked California’s concern over firearm
25 marketing that has been prevalent in America for generations, *see* Ex. B at 8.” The
26 remaining allegations in Paragraph 104 consist of legal argument and/or
27 conclusions that do not require admission or denial. With respect to any citation or
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1 quotation of a legal authority, that authority speaks for itself. To the extent
2 admission or denial is required, Defendant denies all allegations.

3 **ANSWER TO ALLEGATIONS IN “FIRST CAUSE OF ACTION”**

4 107. Defendant incorporates and reasserts his responses to paragraphs 1-106
5 of the Complaint.

6 108. Paragraph 108 of the Complaint consists of legal argument and/or
7 conclusions that do not require admission or denial. With respect to any citation or
8 quotation of a legal authority, that authority speaks for itself. To the extent
9 admission or denial is required, Defendant denies all allegations.

10 109. Paragraph 109 of the Complaint consists of legal argument and/or
11 conclusions that do not require admission or denial. With respect to any citation or
12 quotation of a legal authority, that authority speaks for itself. To the extent
13 admission or denial is required, Defendant denies all allegations.

14 110. Paragraph 110 of the Complaint consists of legal argument and/or
15 conclusions that do not require admission or denial. With respect to any citation or
16 quotation of a legal authority, that authority speaks for itself. To the extent
17 admission or denial is required, Defendant denies all allegations.

18 111. Paragraph 111 of the Complaint consists of legal argument and/or
19 conclusions that do not require admission or denial. With respect to any citation or
20 quotation of a legal authority, that authority speaks for itself. To the extent
21 admission or denial is required, Defendant denies all allegations.

22 112. Paragraph 112 of the Complaint consists of legal argument and/or
23 conclusions that do not require admission or denial. With respect to any citation or
24 quotation of a legal authority, that authority speaks for itself. To the extent
25 admission or denial is required, Defendant denies all allegations.

26 113. Paragraph 113 of the Complaint consists of legal argument and/or
27 conclusions that do not require admission or denial. With respect to any citation or
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1 quotation of a legal authority, that authority speaks for itself. To the extent
2 admission or denial is required, Defendant denies all allegations.

3 114. Paragraph 114 of the Complaint consists of legal argument and/or
4 conclusions that do not require admission or denial. With respect to any citation or
5 quotation of a legal authority, that authority speaks for itself. To the extent
6 admission or denial is required, Defendant denies all allegations.

7 115. Paragraph 115 of the Complaint consists of legal argument and/or
8 conclusions that do not require admission or denial. With respect to any citation or
9 quotation of a legal authority, that authority speaks for itself. To the extent
10 admission or denial is required, Defendant denies all allegations.

11 116. Paragraph 116 of the Complaint consists of legal argument and/or
12 conclusions that do not require admission or denial. With respect to any citation or
13 quotation of a legal authority, that authority speaks for itself. To the extent
14 admission or denial is required, Defendant denies all allegations.

15 **ANSWER TO ALLEGATIONS IN “SECOND CAUSE OF ACTION”**

16 117. Defendant incorporates and reasserts his responses to paragraphs 1-116
17 of the Complaint.

18 118. Paragraph 118 of the Complaint consists of legal argument and/or
19 conclusions that do not require admission or denial. With respect to any citation or
20 quotation of a legal authority, that authority speaks for itself. To the extent
21 admission or denial is required, Defendant denies all allegations.

22 119. Paragraph 119 of the Complaint consists of legal argument and/or
23 conclusions that do not require admission or denial. With respect to any citation or
24 quotation of a legal authority, that authority speaks for itself. To the extent
25 admission or denial is required, Defendant denies all allegations.

26 120. Paragraph 120 of the Complaint consists of legal argument and/or
27 conclusions that do not require admission or denial. With respect to any citation or
28

1 quotation of a legal authority, that authority speaks for itself. To the extent
2 admission or denial is required, Defendant denies all allegations.

3 121. Paragraph 121 of the Complaint consists of legal argument and/or
4 conclusions that do not require admission or denial. With respect to any citation or
5 quotation of a legal authority, that authority speaks for itself. To the extent
6 admission or denial is required, Defendant denies all allegations.

7 122. Paragraph 122 of the Complaint consists of legal argument and/or
8 conclusions that do not require admission or denial. With respect to any citation or
9 quotation of a legal authority, that authority speaks for itself. To the extent
10 admission or denial is required, Defendant denies all allegations.

11 123. Paragraph 123 of the Complaint consists of legal argument and/or
12 conclusions that do not require admission or denial. With respect to any citation or
13 quotation of a legal authority, that authority speaks for itself. To the extent
14 admission or denial is required, Defendant denies all allegations.

15 124. Paragraph 124 of the Complaint consists of legal argument and/or
16 conclusions that do not require admission or denial. With respect to any citation or
17 quotation of a legal authority, that authority speaks for itself. To the extent
18 admission or denial is required, Defendant denies all allegations.

19 **ANSWER TO ALLEGATIONS IN “THIRD CAUSE OF ACTION”**

20 125. Defendant incorporates and reasserts his responses to paragraphs 1-124
21 of the Complaint.

22 126. Paragraph 126 of the Complaint consists of legal argument and/or
23 conclusions that do not require admission or denial. With respect to any citation or
24 quotation of a legal authority, that authority speaks for itself. To the extent
25 admission or denial is required, Defendant denies all allegations.

26 127. Paragraph 127 of the Complaint consists of legal argument and/or
27 conclusions that do not require admission or denial. With respect to any citation or
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1 quotation of a legal authority, that authority speaks for itself. To the extent
2 admission or denial is required, Defendant denies all allegations.

3 128. Paragraph 128 of the Complaint consists of legal argument and/or
4 conclusions that do not require admission or denial. With respect to any citation or
5 quotation of a legal authority, that authority speaks for itself. To the extent
6 admission or denial is required, Defendant denies all allegations.

7 129. Paragraph 129 of the Complaint consists of legal argument and/or
8 conclusions that do not require admission or denial. With respect to any citation or
9 quotation of a legal authority, that authority speaks for itself. To the extent
10 admission or denial is required, Defendant denies all allegations.

11 130. Paragraph 130 of the Complaint consists of legal argument and/or
12 conclusions that do not require admission or denial. With respect to any citation or
13 quotation of a legal authority, that authority speaks for itself. To the extent
14 admission or denial is required, Defendant denies all allegations.

15 131. Paragraph 131 of the Complaint consists of legal argument and/or
16 conclusions that do not require admission or denial. With respect to any citation or
17 quotation of a legal authority, that authority speaks for itself. To the extent
18 admission or denial is required, Defendant denies all allegations.

19 132. Paragraph 132 of the Complaint consists of legal argument and/or
20 conclusions that do not require admission or denial. With respect to any citation or
21 quotation of a legal authority, that authority speaks for itself. To the extent
22 admission or denial is required, Defendant denies all allegations.

23 **ANSWER TO ALLEGATIONS IN “FOURTH CAUSE OF ACTION”**

24 133. Defendant incorporates and reasserts his responses to paragraphs 1-132
25 of the Complaint.

26 134. Paragraph 134 of the Complaint consists of legal argument and/or
27 conclusions that do not require admission or denial. With respect to any citation or
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1 quotation of a legal authority, that authority speaks for itself. To the extent
2 admission or denial is required, Defendant denies all allegations.

3 135. Paragraph 135 of the Complaint consists of legal argument and/or
4 conclusions that do not require admission or denial. With respect to any citation or
5 quotation of a legal authority, that authority speaks for itself. To the extent
6 admission or denial is required, Defendant denies all allegations.

7 136. Paragraph 136 of the Complaint consists of legal argument and/or
8 conclusions that do not require admission or denial. With respect to any citation or
9 quotation of a legal authority, that authority speaks for itself. To the extent
10 admission or denial is required, Defendant denies all allegations.

11 137. Paragraph 137 of the Complaint consists of legal argument and/or
12 conclusions that do not require admission or denial. With respect to any citation or
13 quotation of a legal authority, that authority speaks for itself. To the extent
14 admission or denial is required, Defendant denies all allegations.

15 138. Paragraph 138 of the Complaint consists of legal argument and/or
16 conclusions that do not require admission or denial. With respect to any citation or
17 quotation of a legal authority, that authority speaks for itself. To the extent
18 admission or denial is required, Defendant denies all allegations.

19 139. Paragraph 139 of the Complaint consists of legal argument and/or
20 conclusions that do not require admission or denial. With respect to any citation or
21 quotation of a legal authority, that authority speaks for itself. To the extent
22 admission or denial is required, Defendant denies all allegations.

23 140. Paragraph 140 of the Complaint consists of legal argument and/or
24 conclusions that do not require admission or denial. With respect to any citation or
25 quotation of a legal authority, that authority speaks for itself. To the extent
26 admission or denial is required, Defendant denies all allegations.

27 141. Paragraph 141 of the Complaint consists of legal argument and/or
28 conclusions that do not require admission or denial. With respect to any citation or

1 quotation of a legal authority, that authority speaks for itself. To the extent
2 admission or denial is required, Defendant denies all allegations.

3 **ANSWER TO PRAYER FOR RELIEF**

4 No response is required to Plaintiffs' prayer for relief. To the extent
5 Defendant is required to respond, he denies that Plaintiffs are entitled to the
6 requested relief.

7 **DEFENSES**

8 In addition to the foregoing admissions and denials, and without admitting any
9 allegations contained in the Complaint, Defendants assert the following defenses.

10 **FIRST DEFENSE**

11 The Complaint, and each cause of action alleged therein, is barred by the
12 doctrine of mootness.

13 **SECOND DEFENSE**

14 The Complaint, and each cause of action alleged therein, fails to state a claim
15 on which relief can be granted.

16 **RESERVATION OF DEFENSES**

17 The foregoing defenses are raised without waiver of any other defenses that
18 might become known during this litigation. Defendant hereby reserves his right to
19 amend or supplement their answer to assert any other related defenses.

20 **PRAYER OF DEFENDANTS**

21 WHEREFORE, Defendant prays that:

- 22 1. The Complaint, and all claims and prayers for relief therein, be
23 denied in their entirety;
- 24 2. Plaintiffs take nothing from Defendant by this action;
- 25 3. Defendant be awarded its costs incurred in defending this action;
- 26 4. Defendant be awarded such further relief that the Court may deem
27 just and proper.

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Dated: June 17, 2024

Respectfully submitted,

ROB BONTA
Attorney General of California
MARK R. BECKINGTON
Supervising Deputy Attorney General

s/ Gabrielle D. Boutin
GABRIELLE D. BOUTIN
Deputy Attorney General
*Attorneys for Defendant Rob Bonta, in
his official capacity as Attorney
General of the State of California*

CERTIFICATE OF SERVICE

Case Name: *Junior Sports Magazines Inc., et al. v. Rob Bonta, et al.*

Case Number: 2:22-cv-04663-CAS-JC

I hereby certify that on June 17, 2024, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

ANSWER TO COMPLAINT

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on June 17, 2024, at Los Angeles, California.

Dora Mora
Declarant

Dora Mora
Signature