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ROB BONTA
Attorney General of California
MARK R. BECKINGTON
Supervising Deputy Attorney General
ROBERT L. MEYERHOFF
Deputy Attorneys General
State Bar No. 298196
300 South Spring Street, Suite 1702
Los Angeles, CA 90013-1230
Telephone: (213) 269-6177
Fax: (916) 731-2144
E-mail: Robert.Meyerhoff@doj.ca.gov
*Attorneys for Rob Bonta, in his Official Capacity as
Attorney General of the State of California*

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

RENO MAY, et al.,

Plaintiffs,

v.

**ROBERT BONTA, in his official
capacity as Attorney General of the
State of California,**

Defendant.

Case Nos. 8:23-cv-01696 CJC (ADSx)

**DEFENDANT’S ANSWER TO
FIRST AMENDED COMPLAINT
FOR DECLARATORY AND
INJUNCTIVE RELIEF**

Courtroom: 10B
Judge: Hon. Mónica Ramírez Almadani
Action Filed: September 26, 2023

1 Defendant Rob Bonta, in his official capacity as Attorney General of the State of California,
2 submits his answer in response to Plaintiffs' First Amended Complaint for Declaratory and
3 Injunctive Relief (the FAC) (Dkt. No. 65). Defendant hereby answers the FAC, in paragraphs that
4 correspond to the FAC's paragraphs, as follows:¹

5 **INTRODUCTION²**

6 1. Paragraph No. 1. This paragraph consists of allegations that contain argument and
7 legal contentions and legal authorities that speak for themselves, requiring no response by
8 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

9 2. Paragraph No. 2. Defendant admits that California law requires applicants for a
10 license to carry a concealed handgun or to carry a loaded and exposed handgun are required to
11 meet certain requirements, including, among other things, completing an application, undergoing
12 a background check, completing firearms training, and paying certain fees. The remaining
13 allegations in this paragraph consist of legal arguments and contentions that require no response,
14 but to the extent a response is required, Defendant denies each and every such allegation.

15 3. Paragraph No. 3. This paragraph consists of allegations that contain argument and
16 legal contentions and legal authorities that speak for themselves, requiring no response by
17 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

18 4. Paragraph No. 4. This paragraph consists of allegations that contain argument and
19 legal contentions and legal authorities that speak for themselves, requiring no response by
20 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

21 5. Paragraph No. 5. This paragraph consists of allegations that contain argument and
22 legal contentions and legal authorities that speak for themselves, requiring no response by
23 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

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26 ¹ The following responses to each paragraph include responses to any footnotes that may
27 be contained in the relevant paragraph.

28 ² For the convenience of the Court and the parties, Defendant utilizes certain headings as
set forth in the FAC. In doing so, Defendant neither admits nor denies any allegations that may be
suggested by the FAC's headings.

1 6. Paragraph No. 6. This paragraph consists of allegations that contain argument and
2 legal contentions and legal authorities that speak for themselves, requiring no response by
3 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

4 7. Paragraph No. 7. This paragraph consists of allegations that contain argument and
5 legal contentions and legal authorities that speak for themselves, requiring no response by
6 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

7 8. Paragraph No. 8. This paragraph consists of allegations that contain argument and
8 legal contentions and legal authorities that speak for themselves, requiring no response by
9 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

10 **PARTIES**

11 **Plaintiffs**

12 9. Paragraph No. 9. Defendant lacks sufficient information or belief to respond to the
13 allegations in this paragraph, and on that basis denies each and every allegation.

14 10. Paragraph No. 10. Defendant lacks sufficient information or belief to respond to the
15 allegations in this paragraph, and on that basis denies each and every allegation.

16 11. Paragraph No. 11. Defendant lacks sufficient information or belief to respond to the
17 allegations in this paragraph, and on that basis denies each and every allegation.

18 12. Paragraph No. 12. Defendant lacks sufficient information or belief to respond to the
19 allegations in this paragraph, and on that basis denies each and every allegation.

20 13. Paragraph No. 13. Defendant lacks sufficient information or belief to respond to the
21 allegations in this paragraph, and on that basis denies each and every allegation.

22 14. Paragraph No. 14. Defendant lacks sufficient information or belief to respond to the
23 allegations in this paragraph, and on that basis denies each and every allegation.

24 15. Paragraph No. 15. Defendant lacks sufficient information or belief to respond to the
25 allegations in this paragraph, and on that basis denies each and every allegation.

26 16. Paragraph No. 16. Defendant lacks sufficient information or belief to respond to the
27 allegations in this paragraph, and on that basis denies each and every allegation.
28

1 17. Paragraph No. 17. Defendant lacks sufficient information or belief to respond to the
2 allegations in this paragraph, and on that basis denies each and every allegation.

3 18. Paragraph No. 18. Defendant lacks sufficient information or belief to respond to the
4 allegations in this paragraph, and on that basis denies each and every allegation.

5 19. Paragraph No. 19. Defendant lacks sufficient information or belief to respond to the
6 allegations in this paragraph, and on that basis denies each and every allegation.

7 20. Paragraph No. 20. Defendant lacks sufficient information or belief to respond to the
8 allegations in this paragraph, and on that basis denies each and every allegation.

9 21. Paragraph No. 21. Defendant lacks sufficient information or belief to respond to the
10 allegations in this paragraph, and on that basis denies each and every allegation.

11 22. Paragraph No. 22. Defendant lacks sufficient information or belief to respond to the
12 allegations in this paragraph, and on that basis denies each and every allegation.

13 23. Paragraph No. 23. Defendant lacks sufficient information or belief to respond to the
14 allegations in this paragraph, and on that basis denies each and every allegation.

15 24. Paragraph No. 24. Defendant lacks sufficient information or belief to respond to the
16 allegations in this paragraph, and on that basis denies each and every allegation.

17 25. Paragraph No. 25. Defendant lacks sufficient information or belief to respond to the
18 allegations in this paragraph, and on that basis denies each and every allegation.

19 26. Paragraph No. 26. Defendant lacks sufficient information or belief to respond to the
20 allegations in this paragraph, and on that basis denies each and every allegation.

21 27. Paragraph No. 27. Defendant lacks sufficient information or belief to respond to the
22 allegations in this paragraph, and on that basis denies each and every allegation.

23 28. Paragraph No. 28. Defendant lacks sufficient information or belief to respond to the
24 allegations in this paragraph, and on that basis denies each and every allegation.

25 29. Paragraph No. 29. Defendant lacks sufficient information or belief to respond to the
26 allegations in this paragraph, and on that basis denies each and every allegation.

27 30. Paragraph No. 30. Defendant lacks sufficient information or belief to respond to the
28 allegations in this paragraph, and on that basis denies each and every allegation.

1 31. Paragraph No. 31. Defendant lacks sufficient information or belief to respond to the
2 allegations in this paragraph, and on that basis denies each and every allegation.

3 **Defendants**

4 32. Paragraph No. 32. Defendant admits that Rob Bonta is the Attorney General of the
5 State of California, that he is the chief law officer of California, and that he has various duties
6 under California law. The remaining allegations in this paragraph consist of legal arguments and
7 contentions that require no response, but to the extent a response is required, Defendant denies
8 each and every such allegation.

9 33. Paragraph No. 33. Defendant lacks sufficient information or belief to respond to the
10 allegations in this paragraph, and on that basis denies each and every allegation.

11 **JURISDICTION AND VENUE**

12 34. Paragraph No. 34. This paragraph consists of allegations that contain argument and
13 legal contentions and legal authorities that speak for themselves, requiring no response by
14 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

15 35. Paragraph No. 35. This paragraph consists of allegations that contain argument and
16 legal contentions and legal authorities that speak for themselves, requiring no response by
17 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

18 36. Paragraph No. 36. This paragraph consists of allegations that contain argument and
19 legal contentions and legal authorities that speak for themselves, requiring no response by
20 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

21 37. Paragraph No. 37. Defendant admits that the case entitled *Lance Boland, et al. v.*
22 *Robert Bonta*, Case No. 8:22-cv-01421 is proceeding in the Central District of California, and that
23 the Attorney General is a defendant in that case. The remaining allegations in this paragraph
24 consist of legal arguments and contentions that require no response, but to the extent a response is
25 required, Defendants deny each and every such allegation.

26 38. Paragraph No. 38. This paragraph consists of allegations that contain legal authority
27 that speaks for themselves, requiring no response by Defendant. To the extent that a response is
28 required, Defendant denies each and every allegation.

1 39. Paragraph No. 39. This paragraph consists of allegations that contain argument and
2 legal contentions and legal authorities that speak for themselves, requiring no response by
3 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

4 40. Paragraph No. 40. This paragraph consists of allegations that contain argument and
5 legal contentions and legal authorities that speak for themselves, requiring no response by
6 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

7 41. Paragraph No. 41. This paragraph consists of allegations that contain argument and
8 legal contentions and legal authorities that speak for themselves, requiring no response by
9 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

10 42. Paragraph No. 42. This paragraph consists of allegations that contain argument and
11 legal contentions and legal authorities that speak for themselves, requiring no response by
12 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

13 43. Paragraph No. 43. This paragraph consists of allegations that contain argument and
14 legal contentions and legal authorities that speak for themselves, requiring no response by
15 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

16 44. Paragraph No. 44. This paragraph consists of allegations that contain argument and
17 legal contentions and legal authorities that speak for themselves, requiring no response by
18 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

19 45. Paragraph No. 45. This paragraph consists of allegations that contain argument and
20 legal contentions and legal authorities that speak for themselves, requiring no response by
21 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

22 46. Paragraph No. 46. Defendant admits that on June 24, 2022, the Attorney General
23 issued Legal Alert No. OAG-2022-02, “U.S. Supreme Court’s Decision in *New York State Rifle*
24 *& Pistol Association v. Bruen*, No. 20-843.” The remaining allegations in this paragraph consist
25 of legal arguments and contentions that require no response, but to the extent a response is
26 required, Defendants deny each and every such allegation.

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1 47. Paragraph No. 47. This paragraph consists of allegations that contain argument and
2 legal contentions and legal authorities that speak for themselves, requiring no response by
3 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

4 48. Paragraph No. 48. This paragraph consists of allegations that contain argument and
5 legal contentions and legal authorities that speak for themselves, requiring no response by
6 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

7 49. Paragraph No. 49. This paragraph consists of allegations that contain argument and
8 legal contentions and legal authorities that speak for themselves, requiring no response by
9 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

10 50. Paragraph No. 50. Defendant lacks sufficient information or belief to respond to the
11 allegations in this paragraph, and on that basis denies each and every allegation.

12 51. Paragraph No. 51. Defendant lacks sufficient information or belief to respond to the
13 allegations in this paragraph, and on that basis denies each and every allegation.

14 52. Paragraph No. 52. Defendant lacks sufficient information or belief to respond to the
15 allegations in this paragraph, and on that basis denies each and every allegation.

16 53. Paragraph No. 53. Defendant lacks sufficient information or belief to respond to the
17 allegations in this paragraph, and on that basis denies each and every allegation.

18 54. Paragraph No. 54. Defendant lacks sufficient information or belief to respond to the
19 allegations in this paragraph, and on that basis denies each and every allegation.

20 55. Paragraph No. 55. Defendant lacks sufficient information or belief to respond to the
21 allegations in this paragraph, and on that basis denies each and every allegation.

22 56. Paragraph No. 56. Defendant lacks sufficient information or belief to respond to the
23 allegations in this paragraph, and on that basis denies each and every allegation.

24 57. Paragraph No. 57. Defendant lacks sufficient information or belief to respond to the
25 allegations in this paragraph, and on that basis denies each and every allegation.

26 58. Paragraph No. 58. This paragraph consists of allegations that contain argument,
27 requiring no response by Defendant. To the extent that a response is required, Defendant denies
28 each and every allegation.

1 68. Paragraph No. 68. Defendant admits that SB 918 was introduced in the Legislature
2 but did not pass in 2022. The remaining allegations in this paragraph consist of legal arguments
3 and contentions that require no response, but to the extent a response is required, Defendants deny
4 each and every such allegation.

5 69. Paragraph No. 69. This paragraph consists of allegations that contain argument,
6 requiring no response by Defendant. To the extent that a response is required, Defendant denies
7 each and every allegation.

8 70. Paragraph No. 70. This paragraph consists of allegations that contain argument,
9 requiring no response by Defendant. To the extent that a response is required, Defendant denies
10 each and every allegation.

11 71. Paragraph No. 71. Defendant admits that SB 2 was introduced in 2023, and that the
12 language of new Penal Code Section 26230(a) is the same in SB 918 and SB 2. The remaining
13 allegations in this paragraph consist of argument that requires no response, but to the extent a
14 response is required, Defendant denies each and every such allegation.

15 72. Paragraph No. 72. Defendant admits that there was a press conference held on
16 February 1, 2023, where new gun safety legislation was announced. This remaining allegations in
17 this paragraph consists of allegations that contain argument and legal contentions and legal
18 authorities that speak for themselves, requiring no response by Defendants. To the extent that a
19 response is required, Defendants deny each and every allegation.

20 73. Paragraph No. 73. Defendant lacks sufficient information or belief to respond to the
21 allegations in this paragraph, and on that basis denies each and every allegation.

22 74. Paragraph No. 74. Defendant lacks sufficient information or belief to respond to the
23 allegations in this paragraph, and on that basis denies each and every allegation.

24 75. Paragraph No. 75. Defendant admits that the California State Sheriffs' Association
25 also opposed SB 2 and SB 918. Defendant lacks sufficient information or belief to respond to the
26 remaining allegations in this paragraph, and on that basis denies each and every allegation.

27 76. Paragraph No. 76. Defendant lacks sufficient information or belief to respond to the
28 allegations in this paragraph, and on that basis denies each and every allegation.

1 77. Paragraph No. 77. This paragraph consists of allegations that contain argument and
2 legal contentions that speak for themselves, requiring no response by Defendant. To the extent
3 that a response is required, Defendant denies each and every allegation.

4 78. Paragraph No. 78. Defendant admits that the legislative findings for SB 2 state that
5 “when it comes to restrictions on carrying firearms in public, the United States Supreme Court
6 has recognized three times that states may restrict the carrying of firearms in ‘sensitive places.’”
7 This remaining allegations in this paragraph contain argument and legal contentions and legal
8 authorities that speak for themselves, requiring no response by Defendant. To the extent that a
9 response is required, Defendant denies each and every allegation.

10 79. Paragraph No. 79. Defendant admits that the legislative findings for SB 2 state that
11 “[b]roadly allowing individuals to carry firearms in most public areas increases the number of
12 people wounded and killed by gun violence.” This remaining allegations in this paragraph contain
13 argument and legal contentions and legal authorities that speak for themselves, requiring no
14 response by Defendant. To the extent that a response is required, Defendant denies each and
15 every allegation.

16 80. Paragraph No. 80. This paragraph consists of allegations that contain argument and
17 legal contentions that speak for themselves, requiring no response by Defendant. To the extent
18 that a response is required, Defendant denies each and every allegation.

19 81. Paragraph No. 81. Defendant admits that this paragraph’s quotation and citation to
20 SB 2 is accurate.

21 82. Paragraph No. 82. This paragraph consists of allegations that contain argument and
22 legal contentions that speak for themselves, requiring no response by Defendant. To the extent
23 that a response is required, Defendant denies each and every allegation.

24 83. Paragraph No. 83. This paragraph consists of allegations that contain argument and
25 legal contentions that speak for themselves, requiring no response by Defendant. To the extent
26 that a response is required, Defendant denies each and every allegation.

1 84. Paragraph No. 84. This paragraph consists of allegations that contain argument and
2 legal contentions that speak for themselves, requiring no response by Defendant. To the extent
3 that a response is required, Defendant denies each and every allegation.

4 85. Paragraph No. 85. This paragraph consists of allegations that contain argument and
5 legal contentions that speak for themselves, requiring no response by Defendant. To the extent
6 that a response is required, Defendant denies each and every allegation.

7 86. Paragraph No. 86. This paragraph consists of allegations that contain argument and
8 legal contentions that speak for themselves, requiring no response by Defendant. To the extent
9 that a response is required, Defendant denies each and every allegation.

10 87. Paragraph No. 87. This paragraph consists of allegations that contain argument and
11 legal contentions and legal authorities that speak for themselves, requiring no response by
12 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

13 88. Paragraph No. 88. This paragraph consists of allegations that contain argument and
14 legal contentions and legal authorities that speak for themselves, requiring no response by
15 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

16 89. Paragraph No. 89. This paragraph consists of allegations that contain argument and
17 legal contentions and legal authorities that speak for themselves, requiring no response by
18 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

19 90. Paragraph No. 90. This paragraph consists of allegations that contain argument and
20 legal contentions and legal authorities that speak for themselves, requiring no response by
21 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

22 91. Paragraph No. 91. This paragraph consists of allegations that contain argument and
23 legal contentions and legal authorities that speak for themselves, requiring no response by
24 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

25 92. Paragraph No. 92. Defendant lacks sufficient information or belief to respond to the
26 allegations in this paragraph, and on that basis denies each and every allegation.

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1 101. Paragraph No. 101. This paragraph consists of allegations that contain argument and
2 legal contentions and legal authorities that speak for themselves, requiring no response by
3 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

4 102. Paragraph No. 102. This paragraph consists of allegations that contain argument and
5 legal contentions and legal authorities that speak for themselves, requiring no response by
6 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

7 103. Paragraph No. 103. This paragraph consists of allegations that contain argument and
8 legal contentions and legal authorities that speak for themselves, requiring no response by
9 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

10 **FIRST CLAIM FOR DECLARATORY AND INJUNCTIVE RELIEF**

11 104. Paragraph No. 104. Defendant incorporates by reference the answers in Paragraphs 1
12 through 103 above.

13 105. Paragraph No. 105. This paragraph consists of allegations that contain argument and
14 legal contentions and legal authorities that speak for themselves, requiring no response by
15 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

16 106. Paragraph No. 106. This paragraph consists of allegations that contain argument and
17 legal contentions and legal authorities that speak for themselves, requiring no response by
18 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

19 107. Paragraph No. 107. This paragraph consists of allegations that contain argument and
20 legal contentions and legal authorities that speak for themselves, requiring no response by
21 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

22 108. Paragraph No. 108. This paragraph consists of allegations that contain argument and
23 legal contentions and legal authorities that speak for themselves, requiring no response by
24 Defendant. To the extent that a response is required, Defendant denies each and every allegation.

25 109. Paragraph No. 109. This paragraph consists of allegations that contain argument and
26 legal contentions that speak for themselves, requiring no response by Defendant. To the extent
27 that a response is required, Defendant denies each and every allegation.
28

1 110. Paragraph No. 110. This paragraph consists of allegations that contain argument and
2 legal contentions that speak for themselves, requiring no response by Defendant. To the extent
3 that a response is required, Defendant denies each and every allegation.

4 **PRAYER FOR RELIEF**

5 Defendant denies that Plaintiffs are entitled to the relief set forth in the Prayer for Relief
6 immediately following paragraph 110, or to any relief whatsoever. To the extent that the Prayer
7 for Relief states any allegations, Defendant denies them.

8 In addition, without admitting any allegations contained in the complaint, Defendant asserts
9 the following defenses based on information and belief:

10 **FIRST AFFIRMATIVE DEFENSE**

11 The Complaint, and the claims for relief alleged therein, fails to state facts sufficient to
12 constitute a cause of action against Defendant.

13 **SECOND AFFIRMATIVE DEFENSE**

14 Plaintiffs' claims in this action are barred in that Plaintiffs do not have standing to bring
15 them.

16 **THIRD AFFIRMATIVE DEFENSE**

17 The Complaint, and each cause of action therein, is improper as Plaintiffs have an adequate
18 remedy at law.

19 **FOURTH AFFIRMATIVE DEFENSE**

20 The Complaint, and every cause of action therein, is barred by the equitable doctrines of
21 estoppel, laches, unclean hands, and/or waiver.

22 **FIFTH AFFIRMATIVE DEFENSE**

23 To the extent that Defendant has undertaken any conduct with regard to the subjects and
24 events underlying Plaintiffs' Complaint, such conduct was, at all times material thereto,
25 undertaken in good faith and in reasonable reliance on existing law.

26 **SIXTH AFFIRMATIVE DEFENSE**

27 Defendant has not knowingly or intentionally waived any applicable affirmative defense.
28 Defendant reserves the right to assert and rely upon other such defenses as may become available

1 or apparent during discovery proceedings or as may be raised or asserted by others in this case,
2 and to amend the Answer and/or affirmative defenses accordingly. Defendant further reserves the
3 right to amend the Answer to delete affirmative defenses that they determine are not applicable
4 after subsequent discovery.

5 WHEREFORE, Defendant prays that:

- 6 1. Plaintiffs take nothing by reason of the Complaint;
- 7 2. Judgment be entered in favor of Defendant;
- 8 3. Defendant be awarded costs incurred in defending this action; and
- 9 4. Defendant be awarded such further relief that the Court may deem just and proper.

10 Dated: March 20, 2025

Respectfully submitted,

11 ROB BONTA
12 Attorney General of California
13 MARK R. BECKINGTON
14 Supervising Deputy Attorney General

15 /s/ Robert L. Meyerhoff
16 ROBERT L. MEYERHOFF
17 Deputy Attorney General
18 *Attorneys for Defendant Rob Bonta in his*
19 *official capacity as Attorney General of the State*
20 *of California*

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