

1 HARMEET K. DHILLON (SBN: 207873)  
 harmeet@dhillonlaw.com  
 2 MICHAEL A. COLUMBO (SBN: 271283)  
 mcolumbo@dhillonlaw.com  
 3 MARK P. MEUSER (SBN: 231335)  
 mmeuser@dhillonlaw.com  
 4 DHILLON LAW GROUP INC.  
 177 Post Street, Suite 700  
 5 San Francisco, California 94108  
 6 Telephone: (415) 433-1700  
 7

8 DAVID A. WARRINGTON\*  
 dwarrington@dhillonlaw.com  
 9 GARY M. LAWKOWSKI\*  
 glawkowski@dhillonlaw.com  
 10 DHILLON LAW GROUP INC.  
 2121 Eisenhower Avenue, Suite 402  
 11 Alexandria, VA 22314  
 12 Telephone: (703) 574-1206  
 13

14  
 15 \*Admission *Pro Hac Vice* forthcoming  
 16 *Attorneys for Plaintiffs*

17 **UNITED STATES DISTRICT COURT**

18 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

19  
 20 **NATIONAL ASSOCIATION FOR**  
 21 **GUN RIGHTS, INC.**, a non-profit  
 22 corporation; and Ronald Givens, an  
 individual,

23 Plaintiffs,

24 v.

25 **ROBERT BONTA**, in his official  
 26 capacity as Attorney General of the State  
 27 of California, and DOES 1-25, inclusive,

28 Defendants.

Case Number: \_\_\_\_\_

CLASS ACTION

COMPLAINT FOR DECLARATORY  
 AND INJUNCTIVE RELIEF

JURY TRIAL DEMANDED

1 Plaintiffs National Association for Gun Rights, Inc. (“NAGR”) Ronald Givens  
2 (jointly, “Plaintiffs”), through their counsel, bring this action against Defendant Robert  
3 Bonta, in his official capacity as Attorney General of the State of California. In support  
4 of these requests, Plaintiffs state as follows:

### 5 INTRODUCTION

6 1. On June 27, 2022, Defendant Bonta wrongfully released the sensitive  
7 private information, including names, addresses, and dates of birth, of nearly six  
8 hundred thousand Californians who are gun owners, concealed carry permit holders,  
9 and others whose information was in California’s possession because of its firearms  
10 laws and regulations. This unlawful release of Californians’ sensitive private  
11 information to the public in violation of California and federal law provides criminals  
12 with a road map of who owns a firearm and where those firearms may be located, and  
13 information from which those same criminals can infer which homes are not likely  
14 defended by armed homeowners. Considering the contentious issue of gun ownership,  
15 it also needlessly subjects lawful gun owners to harassment and discrimination.

16 California’s wrongful disclosure of this sensitive private information has caused  
17 great harm and placed the safety of hundreds of thousands of Californians at risk and is  
18 precisely why the state should not keep such information on law abiding gun owners.  
19 Further, the possession of this information is an infringement on the right to keep and  
20 bear arms as protected by the Second and Fourteenth Amendments to the United States  
21 Constitution and is unconstitutional under *New York State Rifle & Pistol Ass’n, Inc. v.*  
22 *Bruen*, --- S. Ct. ----, No. 20-843, 2022 WL 2251305 (June 23, 2022).

### 23 JURISDICTION AND VENUE

24 2. This Court has federal question jurisdiction over this case pursuant to 28  
25 U.S.C. § 1331 because it arises under the Second, Fourth, and Fourteenth Amendments  
26 to the U.S. Constitution and 42 U.S.C. § 1983. This Court has authority under 28  
27 U.S.C. §§ 2201 and 2202 to grant declaratory relief and other relief, including  
28

1 preliminary and permanent injunctive relief, pursuant to Rule 65 of the Federal Rules of  
2 Civil Procedure.

3 3. This Court has supplemental jurisdiction, pursuant to 28 U.S.C. § 1367,  
4 over the state law claims because they are so related that they form part of the same  
5 case or controversy.

6 4. Venue is proper in the Central District of California under 28 U.S.C.  
7 § 1391(b)(2) because a substantial part of the events or omissions giving rise to the  
8 claim occurred, or a substantial part of property that is the subject of the action is  
9 situated. Specifically, numerous members of Plaintiff NAGR reside in the Central  
10 District, where they must bear the burdens and damages inflicted by Defendant Bonta,  
11 and possess firearms that Defendant Bonta's actions have placed at risk of theft by  
12 criminals. Moreover, we note that the State of California's Code of Civil Procedure  
13 permits actions to be filed were the Attorney General and the California Department of  
14 Justice maintain an office, *see* Cal. Civ. Proc. Code § 401(1), as they do in the Central  
15 District.

16 5. The Court has personal jurisdiction over Defendant because Defendant, as  
17 the Attorney General of the State of California, is within the State of California.

### 18 **PARTIES**

19 6. Plaintiff NAGR is a non-stock, non-profit corporation incorporated under  
20 the laws of the Commonwealth of Virginia and has its principal place of business in  
21 Loveland, Colorado. NAGR is a grassroots organization whose mission is to defend the  
22 right to keep and bear arms under the Second Amendment and advance the  
23 constitutional right by educating the American people and urging them to action in  
24 public policy. NAGR has members whose personal data was compromised as a result  
25 of the 2022 Firearms Dashboard Portal.

26 7. Plaintiff Ronald Givens is a resident of Sacramento County. He is a  
27 professional firearms instructor. His personal records were publicly disclosed by the  
28 California Office of the Attorney General in the June 27, 2022 data breach. As a result

1 of the Attorney General’s disclosure, Mr. Givens is concerned for his safety and the  
2 security of the firearms in his home, as well as the negative attention or retaliation the  
3 disclosure may draw from members of the public who are hostile to gun owners.

4 8. Defendant Robert Bonta is the State of California’s Attorney General. In  
5 that capacity, he is the state’s chief law enforcement officer and Article V, section 13,  
6 of the California Constitution imposes on him the duty to enforce the state’s laws. As  
7 Attorney General, Defendant Bonta leads the California Department of Justice  
8 (“Department”) and is responsible for the actions of the DOJ. Plaintiffs are suing  
9 Defendant Bonta in his official capacity.

10 9. At this time, Plaintiffs do not know the true names or capacities of  
11 defendant DOES 1-25, but will amend this Complaint when they are identified.  
12 Plaintiffs allege that Bonta and DOES 1-25, and each of them, are and acted as the  
13 agents of each other with respect to the actions alleged herein.

## 14 **STATEMENT OF FACTS**

### 15 **The 2022 Firearms Dashboard Portal**

16 10. On Thursday, June 23, 2022, the United States Supreme Court decision in  
17 *New York State Rifle & Pistol Association v. Bruen* struck down a New York gun law  
18 that placed restrictions on the concealed carry of guns.

19 11. That same day, Attorney General Bonta released a statement following the  
20 decision that his office and the Governor of California were working with the  
21 legislature to advance new gun legislation.

22 12. Four days later, on Monday, June 27, 2022, the Department launched the  
23 “2022 Firearms Dashboard Portal.”

24 13. In a press release, entitled “Attorney General Bonta Releases New  
25 Firearms Data to Increase Transparency and Information Sharing,” Attorney General  
26 Bonta was quoted as saying, “One of my continued priorities is to better provide  
27 information needed to help advance efforts that strengthen California’s commonsense  
28 gun laws. Today’s announcement puts power and information into the hands of our

1 communities by helping them better understand the role and potential dangers of  
2 firearms within our state.”

3 14. The press release emphasized the mission of the portal by professing that  
4 “[w]ith today’s announcement, Attorney General Bonta is improving accessibility and  
5 functionality of the existing firearms database with expanded information in a  
6 comprehensive data dashboard” and by “[i]mproving transparency by expanding gun  
7 violence-related data the California Department of Justice releases to researchers.”

8 15. Further, “[t]he dashboard also provides links to a variety of supplemental  
9 resources such as reports, applications, legal information . . . The release of the  
10 expanded data and information continues Attorney General Bonta’s commitment to  
11 make the data more accessible to the public.”

12 16. The dashboard included data from the past decade on the following  
13 subjects: Dealer Record of Sales, Gun Violence Restraining Orders, Carry Concealed  
14 Weapons Permits, Firearms Safety Certificates, Assault Weapons, and Roster of  
15 Certified Handguns.

16 ***Release of Californian Gun Owners’ Sensitive Personal Information***

17 17. The 2022 Firearms Dashboard Portal included sensitive personal  
18 information, including the California resident’s full name, gender, date of birth, race,  
19 home address, driver’s license number, permit issue date, and criminal history.

20 18. The information was available on a publicly accessible spreadsheet for  
21 approximately 24 hours until the Department shut down the website on Tuesday, June  
22 28, 2022.

23 19. Visitors to the Firearm Dashboard Portal could download and store this  
24 sensitive personal information via a button on the website’s mapping feature.

25 20. As a result of the leak, more than half-a-million (591,972) Californians  
26 have had their personal information compromised and wrongfully exposed.

27 21. According to published reports, in Los Angeles county alone, 2,891  
28 individuals with standard licenses had their information leaked including 420 reserve

1 officer permits, 244 judge permits, sixty-three employment permits, and seven  
2 custodial officer permits.

3 22. Defendant Bonta later indicated that the Department was “investigating an  
4 exposure of individuals’ personal information connected to the DOJ Firearms  
5 Dashboard” and “[a]ny unauthorized release of personal information is unacceptable.  
6 We are working swiftly to address this situation and will provide additional information  
7 as soon as possible.”

8 23. On Wednesday, June 29, 2022, the Department issued a press release  
9 admitting that based on its current investigation, “the incident exposed the personal  
10 information of individuals who were granted or denied a concealed and carry weapons  
11 (CCW) permit between 2011-2021. . . Additionally, data from the following  
12 dashboards were also impacted: Assault Weapon Registry, Handguns Certified for Sale,  
13 Dealer Record of Sale, Firearm Safety Certificate, and Gun Violence Restraining Order  
14 dashboards.”

15 24. In the same press release, the Department confirmed the data breach in a  
16 statement by Attorney General Bonta admitting that “this unauthorized release of  
17 personal information is unacceptable.” He further commented, “We acknowledge the  
18 stress this may cause those individuals whose information was exposed.”

19 25. The press release also indicated that “the Department will notify those  
20 individuals whose data was exposed and provide additional information and resources.  
21 California law requires a business or state agency to notify any California resident  
22 whose unencrypted personal information, as defined, was acquired, or reasonably  
23 believed to have been acquired, by an unauthorized person.”

24 26. The release provided resources to those whose information was exposed  
25 and advised those individuals to “[m]onitor your credit,” “[c]onsider placing a free  
26 credit freeze on your credit report,” “[p]lace a fraud alert on your credit report,” and  
27 resources if the individuals became “victim[s] of identity theft.”

28 27. According to a June 29, 2022 statement issued by the President of the

1 California State Sheriff’s Association, CSSA President and Butte County Sheriff Kory  
2 Honea stated that “It is infuriating that people who have been complying with the law  
3 have been put at risk by this breach,” and “California’s sheriffs are very concerned  
4 about this data breach and the risk it poses to California’s CCW permit holders.”

5 **CLASS AND COLLECTIVE ACTION ALLEGATIONS**

6 28. Pursuant to Federal Rule of Civil Procedure 23(a), “[o]ne or more  
7 members of a class may sue or be sued as representative parties on behalf of all only if  
8 (1) the class is so numerous that joinder of all members is impracticable; (2) there are  
9 questions of law or fact common to the class; (3) the claims or defenses of the  
10 representative parties are typical of the claims or defenses of the class; and (4) the  
11 representative parties will fairly and adequately protect the interests of the class.” Fed.  
12 R. Civ. P. 23(a)(1)-(4).

13 a. Numerosity: The “numerosity requirement requires examination of the  
14 specific facts of each case and imposes no absolute limitations.” *General*  
15 *Tel. Co. of the NW., Inc. v. EEOC*, 446 U.S. 318, 330 (1980). Over half-a-  
16 million law-abiding gun owners’ information was compromised due to the  
17 2022 Firearms Dashboard Portal. Because the actual number of individual  
18 plaintiffs is so voluminous, and because their exact whereabouts have yet  
19 to be determined, joining all class members in one lawsuit would be  
20 impractical.

21 b. Commonality: The commonality requirement requires plaintiffs to show  
22 that their claims “depend upon a common contention of such a nature that  
23 it is capable of classwide resolution.” *Wal-Mart Stores, Inc. v. Dukes*, 131  
24 S.Ct. 2541, 2545 (2011). Each individual whose information was  
25 published on the 2022 Firearms Dashboard Portal suffered violations of  
26 their privacy, at the federal and state level, and an infringement of their  
27 right to bear arms. The resolution of these claims will be dispositive for  
28 each and every member of the class.



- 1 c. Typicality: “The test of typicality ‘is whether other members have the  
2 same or similar injury, whether the action is based on conduct which is not  
3 unique to the named plaintiffs, and whether other class members have  
4 been injured by the same course of conduct.’” *Hanon v. Dataproducts*  
5 *Corp.*, 976 F.2d 497, 508 (9th Cir. 1992) (citation omitted) (superseded by  
6 statute on other grounds as stated in *Berger v. Ludwick*, No. C-97-0728-  
7 CAL, C-97-2347-CAL, 2000 WL 1262646, at \*7 (N.D. Cal. Aug. 17,  
8 2000)). Every member of the class was injured as a result of Attorney  
9 General Bonta and the Department’s decision to publish their full names,  
10 gender, dates of birth, race, home addresses, driver’s license numbers,  
11 permit issue dates, and criminal history. As a result, each member of the  
12 class has an identical injury that is not unique to any one individual.
- 13 d. Adequacy of Representation: Under, *Amchem Products, Inc. v. Windsor*,  
14 “[t]he adequacy-of-representation requirement ‘tend[s] to merge’ with the  
15 commonality and typicality criteria of Rule 23(a), which ‘serve as  
16 guideposts for determining whether . . . maintenance of a class action is  
17 economical and whether the named plaintiff’s claim and the class claims  
18 are so interrelated that the interests of the class members will be fairly and  
19 adequately protected in their absence.’” 521 U.S. 591, 626 n.20 (1997)  
20 (citing *General Tel. Co. of SW. v. Falcon*, 457 U.S. 147, 157 n.13 (1982)).  
21 As described above, the interests of the class will be adequately  
22 represented and protected due to the fact that the claims and injuries are  
23 identical.

## 24 **FIRST CLAIM FOR RELIEF**

### 25 **The Second Amendment Right to Keep and Bear Arms**

26 **(U.S. Const., amends. II and XIV; 42 U.S.C. § 1983)**

27 **(By all Plaintiffs Individually and as a Collective Action Against Defendant)**

28 29. Plaintiffs and Class Members hereby incorporate by reference and restate



1 the preceding paragraphs, as if set forth herein.

2 30. The Second and Fourteenth Amendments to the United States Constitution  
3 protect the right of ordinary, law-abiding citizens right to keep and bear arms. *See* U.S.  
4 Const., amends. II and XIV; *McDonald v. City of Chicago*, 561 U.S. 742, 750, 778  
5 (2010); *Bruen*, --- S. Ct. ----, No. 20-843, 2022 WL 2251305 \*1.

6 31. The Second Amendment commands that the “right of the people to keep  
7 and bear arms shall not be infringed.” U.S. Const. amend. II.

8 32. That right is “elevate[d] above all other interests the right of law-abiding  
9 responsible citizens to use arms in the defense of hearth and home.” *District of*  
10 *Columbia v. Heller*, 554 U.S. 570, 635 (2008). The Second Amendment protects the  
11 right of Californians to keep and bear arms just like every other citizen.

12 33. California, through Defendant Bonta, collects Californians’ sensitive  
13 personal data, including information contained in concealed carry permit applications,  
14 because those Californians merely seek to exercise their right to keep and bear arms.  
15 California maintains that information indefinitely (the released information covered  
16 information collected during the last decade).

17 34. California’s collection and maintenance of that data is an infringement  
18 upon the right of Californians to exercise their rights to keep and bear arms as protected  
19 by the Second Amendment.

20 35. California’s wrongful collection, maintenance, and release of that data has  
21 a chilling effect on Californians’ exercise of their right to keep and bear arms. The  
22 wrongful release of this sensitive personal information, which is protected from  
23 unauthorized public release or publication by both California and federal law, has and  
24 will have a chilling effect on Californians and their right to keep and bear arms.  
25 Californians will be less likely to submit such information to the state in order to  
26 exercise their right to keep and bear arms, thus they will face the Hobson’s choice of  
27 providing such information to California, or not exercising their right to keep and bear  
28 arms.



1 status as an owner of a firearm(s), violated their right to privacy under the United States  
2 Constitution. *See e.g., Eisenstadt v. Baird*, 405 U.S. 438 (1972); *Griswold v.*  
3 *Connecticut*, 381 U.S. 479 (1965); *Skinner v. Oklahoma*, 316 U.S. 535 (1942).

4 42. Plaintiffs and Class Members had a reasonable expectation that California  
5 would protect their sensitive personal information.

6 43. Plaintiffs and Class Members only provided that information to California  
7 because they wished to exercise their right to keep and bear arms and comply with  
8 California law.

9 44. California represented that the information would only be used for  
10 purposes related to compliance with its law and represents to the public that such  
11 information is protected and will not be wrongfully published or disclosed. *See Cal.*  
12 *Civ. Code §§ 1798-1798.78*

13 45. Despite these representations and in violation of its own laws, California  
14 wrongfully disclosed the Plaintiffs' sensitive personal information.

15 46. As a result the Plaintiffs' and Class Members' privacy rights have been  
16 violated, their credit profiles are at risk to identity thieves, and their property and  
17 physical safety are also at risk.

18 47. Plaintiffs and Class Members therefore seek a declaration that California's  
19 wrongful disclosure of this sensitive personal data violated their privacy rights under  
20 the United States Constitution, placed their identity, property, and physical safety at  
21 risk, and seek an injunction prohibiting California from collecting, maintaining or  
22 disclosing such sensitive personal information in connection with any regulation of  
23 firearms pursuant to California law.

24 48. Plaintiffs and Class Members seek all relief permitted under the law,  
25 including injunctive or other equitable relief to ensure the Department adequately  
26 safeguards their personal information going forward, and attorney fees and costs.

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**THIRD CLAIM FOR RELIEF**

**California’s Constitutional Right to Privacy**

**(Ca. Const., art. 1, § 1)**

**(By all Plaintiffs Individually and as a Collective Action Against Defendant)**

49. Plaintiffs and Class Members hereby incorporate by reference and restate the preceding paragraphs, as if set forth herein.

50. Plaintiffs and Class Members had a legally protected privacy interest in their personal information, which included full name, gender, date of birth, race, home address, driver’s license number, permit issue date, and criminal history, if any.

51. Plaintiffs and Class Members had a reasonable expectation that the personal information they had submitted to the Department at the Department’s direction would remain private and not be disclosed to the public at large.

52. The Department seriously invaded Plaintiffs and Class Members had a legally protected privacy interest when it, upon information and belief, intentionally disclosed to the public at large the personal information of Plaintiffs and the remaining 591,967 Class Members.

53. The Department’s serious invasion of Plaintiffs and Class Members’ legally protected privacy interest was egregious given the type of personal information exposed, including sensitive and confidential information such as date of birth, race, home address, driver’s license number, permit issue date, and criminal history, if any.

54. The public at large had access to this sensitive and confidential information for roughly 24 hours and the ability to download the information.

55. Upon information and belief, the Department intended for the personal information to be released to intimidate Plaintiffs and the remaining 591,967 Class Members — as well as future applicants for concealed carry permits — out of exercising their Second Amendment rights.

56. The timing of the Department’s release of the personal information should not be lost: it came just days after the United States Supreme Court found restrictive

1 concealed carry laws such as California’s unconstitutional on June 23, 2022. This was  
2 also after Defendant Bonta pledged to help enact more gun laws. And the disclosure  
3 occurred in connection with Defendant Bonta’s announcement he was publishing more  
4 information about gun ownership in California.

5 57. Plaintiffs and Class members therefore seek a declaration that California’s  
6 wrongful disclosure of this sensitive personal data violated their privacy rights under  
7 the California Constitution, placed their identity, property, and physical safety at risk,  
8 and seek an injunction prohibiting California from collecting, maintaining or disclosing  
9 such sensitive personal information in connection with any regulation of firearms  
10 pursuant to California law.

11 58. Plaintiffs and Class Members seek all relief permitted under the law,  
12 including injunctive or other equitable relief to ensure the Department adequately  
13 safeguards their personal information going forward, and attorney fees and costs.

#### 14 **FOURTH CLAIM FOR RELIEF**

#### 15 **California Information Practices Act of 1977**

16 **(Cal. Civ. Code §§ 1798-1798.78)**

17 **(By all Plaintiffs Individually and as a Collective Action Against Defendant)**

18 59. Plaintiffs and Class Members hereby incorporate by reference and restate  
19 the preceding paragraphs, as if set forth herein.

20 60. The Information Practices Act (“IPA”) “generally imposes limitations on  
21 the right of governmental agencies to disclose personal information about an  
22 individual.” *Bates v. Franchise Tax Bd.* (2004) 124 Cal.App.4th 367, 373 (citations  
23 omitted). The IPA “was designed by the Legislature to prevent misuse of the increasing  
24 amount of information about citizens which government agencies amass in the course  
25 of their multifarious activities, the disclosure of which could be embarrassing or  
26 otherwise prejudicial to individuals or organizations.” *Anti-Defamation League of B’nai*  
27 *B'rith v. Superior Court* (1998) 67 Cal.App.4th 1072, 1079.

28 61. “Under the Act, state agencies are required to limit the collection and

1 retention of personal information to that necessary to accomplish the agency’s specific  
2 purpose.” *Perkey v. Dep’t of Motor Vehicles* (1986) 42 Cal.3d 185, 193 (citing Cal.  
3 Civil Code § 1798.32). “[A]ll disclosures of personal information are restricted  
4 (§ 1798.24), and an accounting of such disclosures must be made, including disclosures  
5 pursuant to subpoena or search warrant (§ 1798.25).” *Id.*

6 62. The Department is a state office, department, division, or agency and is  
7 therefore subject to the IPA.

8 63. Under the IPA the Department has a duty to not disclose personal  
9 information in a manner that would link the information disclosed to the individual to  
10 whom it pertains.

11 64. Under the IPA the Department has a duty to prevent Class members’  
12 personal information from unauthorized access and exfiltration, theft, or disclosure.

13 65. Under the IPA the Department has a duty to establish appropriate and  
14 reasonable administrative, technical, and physical safeguards to ensure the security and  
15 confidentiality of records, and to protect against anticipated threats or hazards to their  
16 security or integrity which could result in any injury.

17 66. Under the IPA the Department has a duty to designate an employee  
18 responsible for ensuring the Department complies with the IPA.

19 67. Inasmuch as the Department contracts for operation and maintenance of  
20 the personal information records, the Department has a duty to ensure the IPA’s  
21 requirements are applied to those records.

22 68. The Department breached those duties when it disclosed to the public at  
23 large the personal information of Plaintiffs and the remaining 591,967 Class Members.

24 69. As a result of the Department’s breaches Plaintiffs and the remaining  
25 591,967 Class Members have suffered adverse effects, including, on information and  
26 belief, identify theft, harassment, and reputational harm.

27 70. Plaintiffs and Class Members therefore seek a declaration that California’s  
28 excessive and unwarranted collection, maintenance, and wrongful disclosure of this

1 sensitive personal data violated the IPA, placed their identity, property, and physical  
2 safety at risk, and seek an injunction prohibiting California from collecting,  
3 maintaining or disclosing such sensitive personal information in connection with any  
4 regulation of firearms pursuant to California law.

5 71. Plaintiffs and Class Members seek all relief permitted under the law,  
6 including injunctive or other equitable relief to ensure the Department adequately  
7 safeguards their personal information going forward, and attorney fees and costs.

8 **PRAYER FOR RELIEF**

9 WHEREFORE, Plaintiffs pray for the following:

- 10 a. Entry of a judgement declaring that California’s collection, maintenance,  
11 and/or wrongful disclosure of the Plaintiffs’ sensitive personal information  
12 in connection with the Plaintiffs’ desire to exercise their right to keep and  
13 bear arms violated their rights under the Second, Fourth, and Fourteenth  
14 Amendments to the United States Constitution, California’s Constitutional  
15 Right to Privacy (Ca. Const., art. 1, § 1), and the California Information  
16 Practices Act of 1977 (Cal. Civ. Code §§ 1798-1798.78);
- 17 b. An injunction enjoining Defendants from collecting, maintaining, or  
18 disclosing Plaintiffs’ sensitive personal information in connection with the  
19 exercise of the right to keep and bear arms as protected by the Second and  
20 Fourteenth Amendments to the United States Constitution;
- 21 c. An award for remedies available under 42 U.S.C. § 1983 and all  
22 reasonable attorneys’ fees, costs, and expenses under 42 U.S.C. § 1988,  
23 and Cal. Civ. Code §§ 1021.5, 1028, 1029, and 1032; and
- 24 d. For such other and further relief as the Court deems just and proper.

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Dated: July 1, 2022

DHILLON LAW GROUP, INC.

By: /s/ Harmeet K. Dhillon

Harmeet K. Dhillon  
Michael A. Columbo  
Mark P. Meuser  
DHILLON LAW GROUP INC.  
177 Post Street, Suite 700  
San Francisco, California 94108  
(415) 433-1700

David A. Warrington\*  
Gary M. Lawkowski\*  
DHILLON LAW GROUP INC.  
2121 Eisenhower Avenue, Suite 402  
Alexandria, VA 22314  
(571) 400-2121

\*Admission *pro hac vice* forthcoming

*Attorneys for Plaintiffs*

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**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiffs demand trial by jury on all claims in this action of all issues so triable.

Date: July 1, 2022

DHILLON LAW GROUP INC.

By: /s/ Harmeet K. Dhillon  
HARMEET K. DHILLON (SBN: 207873)  
harmmeet@dhillonlaw.com  
DHILLON LAW GROUP INC.  
177 Post Street, Suite 700  
San Francisco, California 94108  
Telephone: (415) 433-1700

*Attorneys for Plaintiffs*