

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

NATIONAL ASSOCIATION FOR GUN RIGHTS,
and JOSEPH R. CAPEN,

Plaintiffs,

v.

ANDREA JOY CAMPBELL, in her official
capacity as Attorney General of the Commonwealth
of Massachusetts,

Defendant.

Civil Action No. 1:22-cv-11431-FDS

DEFENDANT ATTORNEY GENERAL ANDREA JOY CAMPBELL'S
ANSWER TO FIRST AMENDED COMPLAINT

The Defendant Andrea Joy Campbell, in her official capacity as Attorney General of the Commonwealth of Massachusetts (the “Defendant”), hereby answers the Plaintiffs’ Complaint as follows.

1. The Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 1.
2. The Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 2.
3. The allegations of the first sentence of Paragraph 3 are admitted. The Defendant admits that Attorney General Campbell is “in charge of supervising the Office of the Attorney General.” Otherwise, the allegations of paragraph 3 purport to characterize the law, and no response is required.

4. The Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegation of Paragraph 4 that Defendant “is or will enforce the laws challenged in this action against Plaintiffs,” but the Defendant denies any allegation that she has taken any action with respect to the Plaintiffs. The Defendant denies that the challenged laws are unconstitutional.

5. The allegations of Paragraph 5 purport to state legal conclusions, to which no response is required.

6. The allegations of Paragraph 6 purport to characterize the law, and no response is required.

7. The first sentence of Paragraph 7 characterizes Plaintiffs’ claims, and no response is required; the Defendant denies that the challenged laws are unconstitutional. The second sentence purports to characterize the law, and no response is required.

8. The allegations of Paragraph 8 purport to characterize the law, and no response is required.

9. The allegations of Paragraph 9 purport to characterize the law, and no response is required.

10. The allegations of Paragraph 10 purport to characterize the law, and no response is required.

11. The Defendant denies the allegations of Paragraph 11.

12. The first sentence of Paragraph 12 purports to characterize the law, and no response is required. Otherwise, the Defendant denies the allegations of Paragraph 12.

13. The allegations of Paragraph 13 purport to characterize the law, and no response is required.

14. The allegations of the first three sentences of Paragraph 14 purport to characterize the law, and no response is required. Otherwise, the Defendant denies the allegations of Paragraph 14.

15. The Defendant denies the allegations of Paragraph 15.

16. The Defendant denies the allegations of Paragraph 16.

17. The Defendant denies the allegations of Paragraph 17.

18. The Defendant denies the allegations of Paragraph 18.

19. The allegations of Paragraph 19 purport to characterize the law, and no response is required.

20. The Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 20, and on that basis, denies them.

21. The Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 21, and on that basis, denies them.

22. The Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 22, and on that basis, denies them.

23. The Defendant incorporates by reference her responses to Paragraphs 1 through 22.

24. The Defendant denies the allegations in the first two sentences of Paragraph 24. The final sentence of Paragraph 24 purports to characterize the law, and no response is required.

25. The Defendant denies the allegations of Paragraph 25.

26. The allegations of Paragraph 26 purport to characterize the law, and no response is required.

27. The Defendant denies the allegations of Paragraph 27.

28. The Defendant disputes that Plaintiffs are entitled to the relief they seek.
29. The Defendant disputes that Plaintiffs are entitled to the relief they seek.
30. The Defendant disputes that Plaintiffs are entitled to the relief they seek.
31. The Defendant disputes that Plaintiffs are entitled to the relief they seek.

First Affirmative Defense

The Commonwealth's sovereign immunity and Eleventh Amendment immunity bar Plaintiffs from seeking or obtaining relief against the Commonwealth and, in particular, bar a declaration or enforcement of state law against the defendant officials.

Second Affirmative Defense

The Complaint fails to state a claim for violation of Plaintiffs' rights under the Second and Fourteenth Amendments to the United States Constitution.

Third Affirmative Defense

The Plaintiffs have not alleged injury-in-fact and so lack standing to prosecute this case. This Court therefore lacks jurisdiction over the subject matter of this action under Article III.

Fourth Affirmative Defense

The Plaintiffs' claims are not ripe and this Court therefore lacks jurisdiction over the subject matter of this action.

Additional Defenses

The Defendant reserves the right to raise any and all defenses that may become apparent or available during the course of the proceedings in this case.

WHEREFORE, Attorney General Campbell requests that this Court: (1) dismiss the Complaint, deny Plaintiffs' Prayers for Relief with prejudice, and enter judgment for the Defendant; and (2) order such other relief as is just and proper.

September 18, 2025

Respectfully submitted,

ANDREA CAMPBELL,
in her official capacity as Attorney General of the
Commonwealth of Massachusetts,

/s/ Grace Gohlke

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CERTIFICATE OF SERVICE

I, Grace Gohlke, hereby certify that a true and correct copy of the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 18, 2025.

/s/ Grace Gohlke