

1 ROB BONTA  
Attorney General of California  
2 ANTHONY R. HAKL  
Supervising Deputy Attorney General  
3 GABRIELLE D. BOUTIN  
Deputy Attorney General  
4 State Bar No. 267308  
1300 I Street, Suite 125  
5 Sacramento, CA 95814  
Telephone: (916) 210-6053  
6 Fax: (916) 324-8835  
E-mail: Gabrielle.Boutin@doj.ca.gov  
7 *Attorneys for Defendant California Attorney  
General Rob Bonta, in his official capacity*

8  
9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE SOUTHERN DISTRICT OF CALIFORNIA  
11

12  
13 **DANIELLE JAYMES, et al.,**  
14 Plaintiffs,  
15  
16 **v.**  
17 **ROB BONTA, in his official capacity**  
**as Attorney General of California,**  
18 Defendant.

3:25-cv-02711-GPC-DEB  
**ANSWER TO COMPLAINT**  
  
Judge: Hon. Gonzalo P. Curiel  
Trial Date: None set  
Action Filed: October 13, 2025

19  
20 Defendant Attorney General Rob Bonta, in his official capacity, hereby  
21 responds to Plaintiffs’ Complaint for Declaratory, Injunctive Relief, or Other Relief  
22 ECF No. 1 (Complaint), as follows.

23 **ANSWER TO ALLEGATIONS IN “INTRODUCTION”**

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

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

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

11       4. Paragraph 4 of the Complaint consists of legal argument and/or  
12 conclusions that do not require admission or denial. With respect to any citation,  
13 quotation of, or reference to a legal authority, that authority speaks for itself. To  
14 the extent admission or denial of the allegations is required, Defendant denies all  
15 allegations.

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

21                                   **ANSWER TO ALLEGATIONS IN “PARTIES”**

22       6. In response to the allegations in the main body of Paragraph 6 of the  
23 Complaint, Defendant admits that Plaintiff Jaymes has, as of the date of this  
24 Answer, a valid Certificate of Eligibility issued by the California Department of  
25 Justice Bureau of Firearms. As to the remaining allegations. Defendant lacks  
26 knowledge or information sufficient to form a belief as to the truth of the  
27 allegations and, therefore, denies them.

28

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

6 7. In response to Paragraph 7 of the Complaint, Defendant admits that  
7 Plaintiff PWGG, L.P. is a California Limited Partnership and, as of the date of this  
8 Answer, is listed as a firearms dealer in the California Department of Justice’s  
9 Centralized List of Firearms Dealers. The allegation that “[t]hese handguns are, as  
10 discussed below, banned for sale by the laws at issue here” consists of legal  
11 argument and/or conclusions that do not require admission or denial, but Defendant  
12 denies them to the extent a response is necessary. As to the remaining allegations,  
13 Defendant lacks knowledge or information sufficient to form a belief as to their  
14 truth and therefore denies them.

15 8. In response to the allegations in Paragraph 8 of the Complaint, Defendant  
16 admits that Plaintiff John Phillips, as of the date of this Answer, is “an individual  
17 licensee associated with PWG in California’s DOJ’s Centralized List of Firearms  
18 Dealers.” As to the remaining allegations, Defendant lacks knowledge or  
19 information sufficient to form a belief as to the truth of the allegations and,  
20 therefore, denies them.

21 9. In response to the allegations in Paragraph 9 of the Complaint, Defendant  
22 lacks knowledge or information sufficient to form a belief as to the truth of the  
23 allegations and, therefore, denies them.

24 10. In response to the allegations in Paragraph 10 of the Complaint,  
25 Defendant lacks knowledge or information sufficient to form a belief as to the truth  
26 of the allegations and, therefore, denies them.

27  
28

1 11. In response to the allegations in Paragraph 11 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 12. In response to Paragraph 12 of the Complaint, Defendant admits that he  
5 is “the Attorney General of the State of California, and is sued herein in his official  
6 capacity.” Defendant admits that he is the “head of the California DOJ” and that he  
7 maintains an office in San Diego, California.

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

13 **ANSWER TO ALLEGATIONS IN “JURISDICTION AND VENUE”**

14 13. In response to Paragraph 13 of the Complaint, Defendant admits that this  
15 Court has subject matter jurisdiction. The remaining allegations consist of legal  
16 argument and/or conclusions that do not require admission or denial. With respect  
17 to any citation or quotation of a legal authority, that authority speaks for itself. To  
18 the extent admission or denial of the allegations is required, Defendant denies the  
19 allegations.

20 14. In response to Paragraph 14 of the Complaint, Defendant admits that this  
21 venue is proper. The remaining allegations consist 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 of the allegations is required, Defendant denies the allegations.

25  
26 ///

27 ///

28 ///

**ANSWER TO ALLEGATIONS IN “GENERAL ALLEGATIONS”**

1           15.     In response to the allegations in Paragraph 15 of the Complaint,  
2 Defendant admits that Assembly Bill 1127 was signed into law on October 10,  
3 2025. Defendant lacks knowledge or information sufficient to form a belief as to  
4 the truth of the allegations regarding the purpose of Plaintiffs’ lawsuit and,  
5 therefore, denies them. The remaining allegations in Paragraph 15 consist of legal  
6 argument and/or conclusions that do not require admission or denial. With respect  
7 to any citation, quotation of, or reference to a legal authority, that authority speaks  
8 for itself. To the extent admission or denial of the allegations is required,  
9 Defendant denies the allegations.  
10

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

16           17.     Paragraph 17 and footnote 2 of the Complaint consist of legal argument  
17 and/or conclusions that do not require admission or denial. With respect to any  
18 citation, quotation of, or reference to a legal authority, that authority speaks for  
19 itself. To the extent admission or denial of the allegations is required, Defendant  
20 denies all allegations.

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

26           19.     Paragraph 19 of the Complaint consists of legal argument and/or  
27 conclusions that do not require admission or denial. With respect to any citation,  
28 quotation of, or reference to a legal authority, that authority speaks for itself. To

1 the extent admission or denial of the allegations is required, Defendant denies all  
2 allegations.

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

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

13 22. Paragraph 22 of the Complaint consists of legal argument and/or  
14 conclusions that do not require admission or denial. With respect to any citation,  
15 quotation of, or reference to a legal authority, that authority speaks for itself. To  
16 the extent admission or denial of the allegations is required, Defendant denies all  
17 allegations.

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

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

28

**ANSWER TO ALLEGATIONS IN “CLAIMS FOR RELIEF /  
FIRST CAUSE OF ACTION”**

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

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

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

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

18                   29. Paragraph 29 of the Complaint consists of legal argument and/or  
19 conclusions that do not require admission or denial. With respect to any citation,  
20 quotation of, or reference to a legal authority, that authority speaks for itself. To  
21 the extent admission or denial of the allegations is required, Defendant denies all  
22 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,  
25 quotation of, or reference to a legal authority, that authority speaks for itself. To  
26

27  
28

1 the extent admission or denial of the allegations is required, Defendant denies all  
2 allegations.

3 31. Paragraph 31 of the Complaint consists of legal argument and/or  
4 conclusions that do not require admission or denial. With respect to any citation,  
5 quotation of, or reference to a legal authority, that authority speaks for itself. To  
6 the extent admission or denial of the allegations is required, Defendant denies all  
7 allegations.

8 32. Paragraph 32 of the Complaint consists of legal argument and/or  
9 conclusions that do not require admission or denial. With respect to any citation,  
10 quotation of, or reference to a legal authority, that authority speaks for itself. To  
11 the extent admission or denial of the allegations is required, Defendant denies all  
12 allegations.

13 33. Paragraph 33 of the Complaint consists of legal argument and/or  
14 conclusions that do not require admission or denial. With respect to any citation,  
15 quotation of, or reference to a legal authority, that authority speaks for itself. To  
16 the extent admission or denial of the allegations is required, Defendant denies all  
17 allegations.

18 34. Paragraph 34 of the Complaint consists of legal argument and/or  
19 conclusions that do not require admission or denial. With respect to any citation,  
20 quotation of, or reference to a legal authority, that authority speaks for itself. To  
21 the extent admission or denial of the allegations is required, Defendant denies all  
22 allegations.

23 35. Paragraph 35 of the Complaint consists of legal argument and/or  
24 conclusions that do not require admission or denial. With respect to any citation,  
25 quotation of, or reference to a legal authority, that authority speaks for itself. To  
26 the extent admission or denial of the allegations is required, Defendant denies all  
27 allegations.

28

1 36. Paragraph 36 of the Complaint consists of legal argument and/or  
2 conclusions that do not require admission or denial. With respect to any citation,  
3 quotation of, or reference to a legal authority, that authority speaks for itself. To  
4 the extent admission or denial of the allegations is required, Defendant denies all  
5 allegations.

6 37. Paragraph 37 of the Complaint consists of legal argument and/or  
7 conclusions that do not require admission or denial. With respect to any citation,  
8 quotation of, or reference to a legal authority, that authority speaks for itself. To  
9 the extent admission or denial of the allegations is required, Defendant denies all  
10 allegations.

11 38. In response to the allegations in Paragraph 38 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 39. In response to the allegations in Paragraph 39 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 40. In response to the allegations in Paragraph 40 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 41. In response to the allegations in Paragraph 41 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 42. In response to the allegations in Paragraph 42 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 43. In response to the allegations in Paragraph 43 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 44. In response to the allegations in Paragraph 44 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 45. In response to the allegations in Paragraph 45 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 46. In response to the allegations in Paragraph 46 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 47. Paragraph 47 of the Complaint consists of legal argument and/or  
11 conclusions that do not require admission or denial. With respect to any citation,  
12 quotation of, or reference to a legal authority, that authority speaks for itself. To  
13 the extent admission or denial of the allegations is required, Defendant denies all  
14 allegations.

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

20 49. Paragraph 49 of the Complaint consists of legal argument and/or  
21 conclusions that do not require admission or denial. With respect to any citation,  
22 quotation of, or reference to a legal authority, that authority speaks for itself. To  
23 the extent admission or denial of the allegations is required, Defendant denies all  
24 allegations.

25 **ANSWER TO PRAYER FOR RELIEF**

26 No response is required to Plaintiffs' prayer for relief. To the extent  
27 Defendant is required to respond, he denies that Plaintiffs are entitled to any of the  
28 requested relief.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DEFENSES**

In addition to the foregoing admissions and denials, and without admitting any allegations contained in the Complaint, Defendant asserts the following defenses.

**FIRST DEFENSE**

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

**SECOND DEFENSE**

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

**THIRD DEFENSE**

The Complaint, and each cause of action alleged therein, is barred as unripe.

**FOURTH DEFENSE**

The Complaint, and each cause of action alleged therein, is barred because Plaintiffs lack standing.

**RESERVATION OF DEFENSES**

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

**PRAYER OF DEFENDANT**

WHEREFORE, Defendant prays that:

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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: December 4, 2025

Respectfully submitted,

ROB BONTA  
Attorney General of California  
ANTHONY R. HAKL  
Supervising Deputy Attorney General

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

**CERTIFICATE OF SERVICE**Case Name: **Jaymes, Danielle, et al. v. Rob  
Bonta**No. **3:25-cv-02711-GPC-DEB**

I hereby certify that on December 4, 2025, 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 December 4, 2025, at Los Angeles, California.

---

Cecilia Apodaca

Declarant

---

*/s/ Cecilia Apodaca*

Signature

SA2025305854  
68016999