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12 **UNITED STATES DISTRICT COURT**

13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 B & L PRODUCTIONS, INC., d/b/a  
CROSSROADS OF THE WEST;  
15 BARRY BARDACK; RONALD J. DIAZ,  
SR.; JOHN DUPREE; CHRISTOPHER  
16 IRICK; LAWRENCE WALSH;  
MAXIMUM WHOLESALE, INC., d/b/a  
17 AMMO BROS.; CALIFORNIA RIFLE &  
PISTOL ASSOCIATION,  
18 INCORPORATED; SOUTH BAY ROD  
AND GUN CLUB, INC.; and SECOND  
19 AMENDMENT FOUNDATION,

20 Plaintiffs,

v.

21 22nd DISTRICT AGRICULTURAL  
22 ASSOCIATION; STEVE  
SHEWMAKER, President of 22nd  
23 District Agricultural Association, in his  
official and individual capacity;  
24 RICHARD VALDEZ, Vice President of  
22nd District Agricultural Association, in  
25 his official and individual capacity;  
KAREN ROSS, Secretary of California  
26 Department of Food & Agriculture, in her  
official capacity; DOES 1-50,

27 Defendants.  
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CASE NO: 3:19-cv-00134-CAB-NLS

**DECLARATION OF ALAN  
GOTTLIEB, EXECUTIVE VICE  
PRESIDENT OF SECOND  
AMNDMENT FOUNDATION**

[Filed concurrently with Memorandum  
of Points and Authorities in Opposition  
to Defendants' Motion to Dismiss and  
in Support of Plaintiffs' Motion for  
Summary Judgment, Request for  
Judicial Notice, and the Declarations of  
Anna M. Barvir, Tiffany D. Chevront,  
Philip Y. Okita, Tracy Olcott, Barry  
Bardack, Ronald J. Diaz, Sr., John  
Dupree, Christopher Irick, Lawrence  
Walsh, Shaun Redmon, Richard Travis,  
and Jon Sivers]

Date: May 1, 2019  
Judge: Hon. Cathy Ann Bencivengo  
Action Filed: January 21, 2019

**DECLARATION OF ALAN GOTTLIEB**

1  
2 1. I, Alan Gottlieb, am the Executive Vice President of Plaintiff Second  
3 Amendment Foundation (hereinafter “SAF”). I make this declaration of my own  
4 personal knowledge and, if called as a witness, I could and would testify  
5 competently to the truth of the matters set forth herein.

6 2. SAF is a non-profit membership and donor-supported organization  
7 classified under IRC section 501(c)(3) and incorporated under the laws the state of  
8 Washington with its headquarters in Bellevue, Washington.

9 3. SAF has in the past participated in the gun shows held at the Del Mar  
10 Fairgrounds (“Venue”) as a participant with a booth at the co-plaintiffs’ gun shows  
11 and would like to hosts booths and participate at guns shows again at this Venue.

12 4. Gun shows like the one at issue in this case, are events where  
13 individuals engage in lawful trade, commerce, and the exchange of information  
14 related to, and necessary for, exercising Second Amendment rights such as self-  
15 defense, hunting, and target shooting. They are a forum for lectures, training, and  
16 discussions about gun rights. Gun shows also present a unique place for the  
17 exchange of knowledge regarding the market for firearms, firearms accessories, and  
18 other related products.

19 5. Gun shows, like the one at issue in this case, promote the public safety  
20 of the State of California for lawful firearm transactions and transfers by providing a  
21 convenient, public, and transparent venue for lawful commerce of firearms and  
22 discussion of related firearm and constitutional matters.

23 6. SAF is a member of the “gun culture” which is a discrete and  
24 identifiable group of individuals, who share a desire to exercise fundamental rights  
25 protected by the Second Amendment, and who seek to participate in public  
26 discourse and share in the benefits of public resources like the use of the Venue.  
27 CRPA members are also a part of this discrete and identifiable group of individuals.  
28 Gun shows are a vital part of participation in “gun culture.”

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7. Defendants' moratorium will diminish, for SAF, and in the aggregate for the community that comprises the "gun culture," the dissemination of information and commerce that is related to SAF's exercise of constitutional rights under the First Amendment and Second Amendment at the Venue.

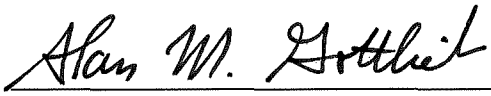
8. SAF promotes programs, memberships in their organization, political substance to discussions on issues with firearms and constitutional rights and engages members of the public and those attending the gun shows regarding these issues. The SAF will sustain and has sustained lost opportunities to engage those people and to speak to potential members caused by Defendants' moratorium.

9. SAF is a membership organization that expend resources and advocate on behalf of their members' First and Second Amendment rights at many public forums throughout California.

10. SAF has engaged in advocacy and expenditure of resources at gun shows throughout California, including gun shows that have historically take place at the Venue.

I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct.

Executed in (City) BELLEVUE, WA on (Date) MARCH 28, 2019.

  
\_\_\_\_\_  
Alan Gottlieb  
Declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

Case Name: *B & L Productions, Inc., et al. v. 22nd District Agricultural Association, et al.*  
Case No.: 3:19-cv-00134 CAB (NLS)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**DECLARATION OF ALAN GOTTLIEB, EXECUTIVE VICE  
PRESIDENT OF SECOND AMNDMENT FOUNDATION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Xavier Becerra  
Attorney General of California  
Paul Stein  
Supervising Deputy Attorney General  
Joshua M. Caplan  
Deputy Attorney General  
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Deputy Attorney General  
455 Golden Gate Avenue, Suite 11000  
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*Attorneys for Defendants*

I declare under penalty of perjury that the foregoing is true and correct.

Executed April 17, 2019.

/s/ Laura Palmerin  
Laura Palmerin