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11
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
CHRISTOPHER IRICK**

[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, Lawrence Walsh, Shaun
Redmon, Richard Travis, Jon Sivers,
and Alan Gottlieb]

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

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DECLARATION OF CHRISTOPHER IRICK

1. I, Christopher Irick, am a Plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of San Diego County, California.

3. I have participated as an attendee at the Crossroads of the West Gun Show, a recurring gun-show event produced by Plaintiff B & L Productions and held at the Del Mar Fairgrounds (“Venue”).

4. But for the 22nd District Agricultural Association’s moratorium on gun shows at the Venue, I would continue to participate as an attendee at the Crossroads of the West Gun Show events at the Venue.

5. I attend gun shows, like the Crossroads of the West Gun Show at the Venue, because they provide me with a unique opportunity to congregate with like-minded people to discuss and explore the many lawful uses of firearms, including self-defense, hunting, safety training, gunsmithing, and appreciation of firearms.

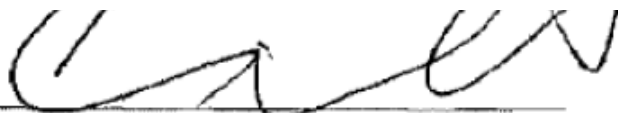
6. At gun shows, I can also share information with others who share my appreciation for firearms, listen to speakers give lectures, attend classes, and participate in discussions about gun rights.

7. I am a member of the “gun culture,” which is a discrete and identifiable group of individuals and organizations, who share a desire to exercise fundamental rights protected by the Second Amendment, and who seek to participate in public discourse and share in the benefit of a public resource, like the Venue. Participating in that culture is one of the primary reasons I attend gun shows, even if I am not in the market to sell or buy a firearm.

8. As a member of the local community, I believe that I should have the same ability to attend events that interest me at the Venue as others who attend their events of choice and congregate at the Venue, but Defendants have prevented me from doing so through their gun show moratorium.

1 9. Defendants' moratorium will diminish for me, and in the aggregate for
2 the community that comprises the "gun culture" the dissemination of information and
3 commerce that is related to the exercise of my constitutional rights under the First
4 Amendments and the Second Amendment at the Venue.

5 I declare under penalty of perjury, under the laws of the United States, that the
6 foregoing is true and correct. Executed in Carlsbad, California on April 17, 2019.

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10 Christopher Irick
11 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 CHRISTOPHER IRICK

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
P. Patty Li
Deputy Attorney General
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
E-mail: patty.li@doj.ca.gov
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