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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,
21 v.

22 22nd DISTRICT AGRICULTURAL
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.
28

CASE NO: 3:19-cv-00134-CAB-NLS

**DECLARATION OF RICHARD
TRAVIS, EXECUTIVE DIRECTOR
OF CALIFORNIA RIFLE &
PISTOL ASSOCIATION,
INCORPORATED**

[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, Jon Sivers, and
Alan Gottlieb]

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

DECLARATION OF RICHARD TRAVIS

1
2 1. I, Richard Travis, am the Executive Director of Plaintiff California
3 Rifle & Pistol Association, Incorporated (“CRPA”). I make this declaration of my
4 own 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. CRPA is a non-profit, membership, and donor-supported organization
7 classified under IRC section 501(c)(4) and incorporated under the laws of California
8 with its headquarters in Fullerton, California.

9 3. The mission of CRPA is to protect and defend the Constitution of the
10 United States and the individual’s right to keep and bear arms both in public and in
11 private; to promote and educate the public regarding safe and responsible firearm
12 ownership and use; provide firearm education and safety training; encourage
13 participation in the shooting sports and sponsor competitive state championship
14 matches and shooting teams; to sponsor legislation, regulatory policies and litigation
15 that supports the mission of CRPA; promote the individual’s right of self-
16 preservation, hunting, defense of family, and persons; and to oppose any actions
17 which the CRPA believes infringe upon the individual rights guaranteed by the
18 Second Amendment.

19 4. CRPA has participated in the gun shows held at the Del Mar
20 Fairgrounds (“Venue”) as a participant with a vendor booth at gun-show events
21 produced by Plaintiff B & L Productions and held at the Venue.

22 5. But for the 22nd District Agricultural Association’s moratorium on gun
23 shows at the Venue, CRPA would continue to participate as a vendor at gun-show
24 events at the Venue.

25 6. CRPA is not in the business of selling firearms or ammunition. And it
26 has not done so at the Crossroads of the West Gun Show at the Venue.

27 7. Instead, as a vendor at the Crossroads of the West Gun Show at the
28 Venue, CRPA engages with gun show attendees to promote its programs, including

1 firearm safety training, competitive and recreational shooting events, and
2 fundraisers.

3 8. CRPA also participates as a vendor at the Crossroads of the West Gun
4 Show to encourage attendees to become supporting members of the organization.

5 9. CRPA volunteers engage gun show attendees in discussions about the
6 lawful uses of firearms, including self-defense, safety training, hunting, military
7 service, and recreational shooting. They also discuss issues regarding gun laws and
8 the preservation of the Second Amendment.

9 10. CRPA has also invited speakers to give lectures about, inter alia,
10 hunting, firearm safety, and state and federal firearms law, at the Crossroads of the
11 West Gun Show. And, sometimes, CRPA presents comprehensive training on
12 firearm-related topics.

13 11. CRPA, as well as its individual members, participate in and are
14 members of the “gun culture,” a discrete and identifiable group of people and
15 organizations, who share a desire to exercise fundamental rights protected by the
16 Second Amendment. They also seek to participate in public discourse and share in
17 the benefits of public resources like the use of the Venue. Participating in that
18 culture is one of the primary reasons people attend gun shows.

19 12. Defendants’ moratorium will diminish, for CRPA, and in the aggregate
20 for the community that comprises the “gun culture,” the dissemination of
21 information and commerce related to CRPA’s exercise of constitutional rights under
22 the First Amendment and Second Amendment at the Venue.

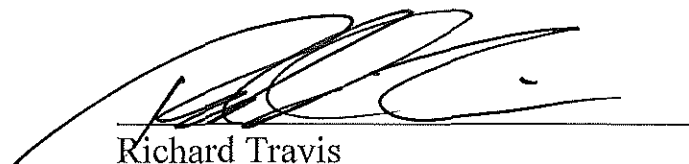
23 13. CRPA will sustain and has sustained lost opportunities to engage those
24 people and to speak to potential members caused by Defendants’ moratorium.

25 14. CRPA is a membership organization that expends resources and
26 advocates on behalf of their members’ First and Second Amendment rights at many
27 public forums throughout California.

28 15. CRPA has engaged in advocacy and expenditure of resources at gun

1 shows throughout California, including gun shows that have historically taken place
2 at the Venue.

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

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7 
8 Richard Travis
9 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 RICHARD TRAVIS , EXECUTIVE DIRECTOR OF CALIFORNIA RIFLE & PISTOL ASSOCIATION, INCORPORATED

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
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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