

1 C.D. Michel-SBN 144258  
Anna M. Barvir-SBN 268728  
2 Tiffany D. Chevront-SBN 317144  
MICHEL & ASSOCIATES, P.C.  
3 180 East Ocean Blvd., Suite 200  
Long Beach, CA 90802  
4 Telephone: (562) 216-4444  
Fax: (562) 216-4445  
5 Email: [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)

*Attorneys for Plaintiffs B & L Productions, Inc., Bardack, Diaz, Dupree, Irick,  
6 Walsh, Maximum Wholesale, Inc., California Rifle & Pistol Association, Inc.,  
South Bay Rod and Gun Club, Inc.*

7  
8 Donald Kilmer-SBN 179986  
Law Offices of Donald Kilmer, APC  
1645 Willow Street Suite 150  
9 San Jose, CA 95125  
Telephone: (408) 264-8489  
10 Fax: (408) 264-8487  
Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

*Attorney for Plaintiff Second Amendment Foundation*

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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 RONALD J.  
DIAZ, SR.**

[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, John Dupree, Christopher  
Irick, 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 RONALD J. DIAZ, SR.**

1. I, Ronald J. Diaz, Sr., 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 are unique events that allow me to meet with like-minded people to discuss the lawful uses of firearms, including self-defense, hunting, target shooting, safety training, gunsmithing, and appreciation of firearms as art and historical objects.

6. I, like many people that attend gun shows at the Venue, believe the Second Amendment is an individual right that must be protected. The Crossroads of the West Gun Show at the Venue allows me the opportunity to speak freely about these beliefs without fear or condemnation from those that do not agree with my beliefs.

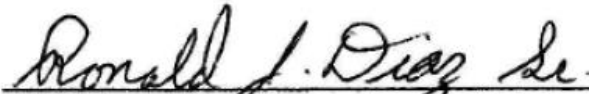
7. I am a member of the “gun culture,” which is a discrete and identifiable group of individuals and organizations, who share a desire to exercise fundamental rights protected by the Second Amendment, and who seek to participate in public discourse and share in the benefit of a public resource, like 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. It is important to me that gun shows continue to be held at the Venue

1 because there are no other venues in the community that can host an event as large  
2 as the Crossroads of the West Gun Show. And because I believe that if the Venue is  
3 open to the public, it should be open to all public, not just those members of the  
4 public that Defendants' agree with.

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

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

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14 Ronald J. Diaz, Sr.  
15 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 RONALD J. DIAZ, SR.**

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](mailto: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