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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 SHAUN
REDMON, CHIEF OPERATIONS
OFFICER OF MAXIMUM
WHOLESALE, INC., D/B/A AMMO
BROS.**

[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, Richard Travis, Jon Sivers, and
Alan Gottlieb]

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

DECLARATION OF SHAUN REDMON

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2 1. I, Shaun Redmon, am the Chief Operations Officer of Plaintiff
3 Maximum Wholesale, Inc., d/b/a Ammo Bros. (“Ammo Bros.”). I make this
4 declaration of my own personal knowledge and, if called as a witness, I could and
5 would testify competently to the truth of the matters set forth herein.

6 2. Ammo Bros. is a for-profit retailer of firearms and ammunition with its
7 headquarters in Ontario, California. Ammo Bros. is licensed to do business in
8 California with the California Secretary of State.

9 3. Ammo Bros. has participated as an attendee and vendor at the
10 Crossroads of the West Gun Show, a recurring gun-show event produced by Plaintiff
11 B & L Productions and held at the Del Mar Fairgrounds (“Venue”). Ammo Bros. has
12 complied with all applicable laws as a retail vendor at those events.

13 4. But for the 22nd District Agricultural Association’s moratorium on gun
14 shows at the Venue, Ammo Bros. would continue to participate as a lawful vendor at
15 the Crossroads of the West Gun Show events at the Venue.

16 5. As a vendor at the Crossroads of the West Gun Show, Ammo Bros.
17 sells legal firearm-related products, including ammunition, holsters, accessories, and
18 cleaning supplies. We also enjoy the unique opportunity to interact with our
19 customers in a meaningful way. Indeed, we often have a chance to share our
20 knowledge about available products with potential customers who might not
21 otherwise have ready access to an experienced retailer.

22 6. Ammo Bros. maintains “brick and mortar” stores and vendor booths at
23 gun shows and must follow all of the same safety guidelines and legal requirements
24 at any location where they participate as a vendor.

25 7. Ammo Bros. participates in gun shows at the Venue because it is a
26 public forum that encourages public gatherings for the purpose of commerce and the
27 exchange of information by individuals and businesses.

28 8. Because of Defendants’ gun show moratorium, Defendants have

1 refused to contract with Plaintiff B & L Productions to host the Crossroads of the
2 West Gun Show at the Venue. Thus, there are no more gun shows scheduled at the
3 Venue for the foreseeable future.

4 9. Ammo Bros.’ business will sustain and has sustained lost profits due to
5 Defendants’ moratorium which prohibits gun shows at the Venue.

6 10. Ammo Bros.’ participates in and is a member of the “gun culture,” a
7 discrete and identifiable group of people, businesses, and organizations, who share a
8 desire to exercise fundamental rights protected by the Second Amendment. Many, if
9 not all of Ammo Bros. customer base participates in the “gun culture.” Participating
10 in that culture is one of the primary reasons people, including Ammo Bros., attend
11 gun shows.

12 11. Many of Ammo Bros. customers attend gun shows at the Venue to
13 exchange in conversation with Ammo Bros. about new products and knowledge that
14 they cannot get elsewhere.

15 12. Defendants’ moratorium will diminish for Ammo Bros., and in the
16 aggregate for the community that comprises the “gun culture,” the dissemination of
17 information and commerce that is related to the exercise of constitutional rights
18 under the First Amendments and the Second Amendment at the Venue.

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

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23 Shaun Redmon
24 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 SHAUN REDMON, CHIEF OPERATIONS OFFICER
OF MAXIMUM WHOLESALE, INC., D/B/A AMMO BROS.**

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
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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