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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

B&L PRODUCTIONS, INC., d/b/a
CROSSROADS OF THE WEST;
GERALD CLARK; ERIC JOHNSON;
CHAD LITRELL; JAN STEVEN
MERSON; CALIFORNIA RIFLE &
PISTOAL ASSOCIATION,
INCORPORATED; ASIAN PACIFIC
AMERICAN GUN OWNERS
ASSOCIATION; SECOND
AMENDMENT LAW CENTER, INC.;;
and SECOND AMENDMENT
FOUNDATION,

Plaintiffs,

v.

GAVIN NEWSOM, in his official
capacity as Governor of the State of
California; ROB BONTA, in his official
capacity as Attorney General of the
State of California; KAREN ROSS, in
her official capacity as Secretary of
California Department of Food &
Agriculture and in his personal capacity;
TODD SPITZER, in his official capacity
as District Attorney of Orange County;
32nd DISTRICT AGRICULTURAL
ASSOCIATION; DOES 1-10;

Defendants.

CASE NO.: 8:22-cv-01518 JWH (JDEx)

**DECLARATION OF PATRICK
LOPEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Hearing Date: January 6, 2023
Hearing Time: 9:00 a.m.
Courtroom: 9D
Judge: John W. Holcomb

Action Filed: August 12, 2022

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DECLARATION OF PATRICK LOPEZ

1. I, Patrick Lopez, am the founder of Plaintiff Asian Pacific American Gun Owners Association (“APAGOA”). 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. APAGOA is a nonprofit organization incorporated under the laws of Texas and registered with the California Secretary of State to do business in the state of California. APAGOA has approximately 270 members who reside in California.

3. APAGOA is a community of gun owners with an Asian Pacific American (“APA”) heritage. Its core focus is to promote safe and responsible gun ownership within the APA community by providing educational materials and other resources to its members and other interested parties. APAGOA advocates for firearm safety, education, and community-building initiatives. And it strives to educate and empower the APA gun owner community so they can use their firearms safely and responsibly.

4. Before the implementation of Senate Bill 264, APAGOA participated as a nonprofit participant at the Crossroads of the West Gun Show, a recurring, safe, and family-friendly gun-show event produced by B&L Productions, Inc., d/b/a Crossroads of the West (“Plaintiff Crossroads”) and held at the Orange County Fair & Event Center (“the Fairgrounds”).

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

6. Before the adoption and implementation of Senate Bill 264, APAGOA

1 attended gun shows across the Fairgrounds to promote the preservation and
2 expansion of constitutional and statutory rights of gun ownership, including the right
3 to self-defense and the right to keep and bear arms.

4 7. Being a vendor at the gun shows affords APAGOA a unique
5 opportunity ability to meaningfully interact with gun owners (and those who hope to
6 become gun owners), share experiences, and talk about the politics and laws
7 surrounding the Second Amendment. APAGOA does this by providing educational
8 materials and other resources to members and those of the general public.

9 8. APAGOA strives to educate and empower the Asian Pacific American
10 community so they can be responsible gun owners and protect themselves and their
11 loved ones. Attending large-scale events like gun shows allows APAGOA the ability
12 to publicize our message about safety and self-protection at a time when this has
13 become vitally important to the APA community.

14 9. APAGOA is a member and supporter of the “gun culture,” which is a
15 discrete and identifiable group of individuals and organizations, who share a desire
16 to exercise fundamental rights protected by the Second Amendment, and who seek
17 to participate in public discourse and share in the benefit of a public resource, like
18 the Fairgrounds. APAGOA members are also a part of this discrete and identifiable
19 group. Participating in that culture with other gun owners is one of the primary
20 reasons SAF and its members attend gun shows.

21 10. APAGOA promotes its programs and memberships in its organization
22 and engages members of the public and those attending gun shows in political
23 discussions related to firearms and constitutional rights. As a result of the adoption
24 and enforcement of SB 264 and SB 915, APAGOA will sustain and has, in fact,
25 sustained lost opportunities to engage those people and to speak to potential
26 members.

27 11. APAGOA is a membership organization that expends resources and
28 advocates on behalf of their members’ First and Second Amendment rights at many

1 public forums throughout California.

2 12. APAGOA has engaged in advocacy and expenditure of resources at
3 gun shows throughout California, including gun shows that have historically taken
4 place at the Fairgrounds.

5 13. But for the adoption and enforcement of SB 264 and SB 915 which
6 prohibits the sale of firearms, ammunition, and firearm precursor parts at the
7 Fairgrounds, APAGOA would resume its participation as a nonprofit vendor at gun
8 show events at the Fairgrounds.

9 14. If this Court were to enjoin the enforcement of SB 264 and SB 915,
10 allowing Plaintiff Crossroads' gun show events to return to the Fairgrounds,
11 APAGOA would resume its participation as a nonprofit vendor at gun show events
12 at the Fairgrounds.

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

14 Executed within the United States on November 16, 2022.

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16 Patrick Lopez
17 Declarant

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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *B & L Productions, Inc., et al. v. Newsom, et al.*
Case No.: 8:22-cv-01518 JWH (JDEx)

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:

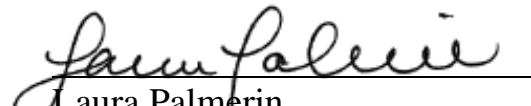
**DECLARATION OF PATRICK LOPEZ IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

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

Nicole J. Kau, Deputy Attorney General
nicole.kau@doj.ca.gov
300 South Spring Street, Suite 1702
Los Angeles, CA 90013-1230
Attorney for Defendants

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

Executed November 16, 2022.



Laura Palmerin