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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 ALAN  
GOTTLIEB 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 ALAN GOTTLIEB**

1. I, Alan Gottlieb, am the Executive Vice President and founder of Plaintiff Second Amendment Foundation (“SAF”). 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. SAF is a non-profit membership and donor-supported organization classified under IRC section 501(c)(3) and incorporated under the laws of the state of Washington with its headquarters in Bellevue, Washington.

3. Before the adoption and implementation of recent gun show regulations designed to ban them from state property (Senate Bill 264 & Senate Bill 915), SAF’s members have attended gun shows at the Crossroads of the West Gun Show. These gun-show events are a recurring, safe, and family-friendly gathering produced by B&L Productions, Inc., d/b/a Crossroads of the West (“Plaintiff Crossroads”), including gun shows held at the Orange County Fair & Event Center (“the Fairgrounds”). It is my understanding that B & L Productions, Inc., d/b/a/ Crossroads of the West, holds these events at state-owned properties and fairgrounds throughout California.

4. Gun shows like the one at issue in this case, are public 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 and timely place for the exchange of knowledge regarding the market for firearms, firearms accessories, and other related products.

5. Gun shows, like the one at issue in this case, also promote public safety. They do this by providing a convenient, public, and transparent venue for lawful commerce of firearms. I allege on information and belief that closing such venues would have the effect of driving a significant portion of firearm transactions

1 underground, i.e., away from the highly regulated environment that is easily  
2 accessible to law enforcement at gun shows and their other retail establishments.  
3 Thus the unintended consequence of banning gun shows from the public square,  
4 might actually increase illegally transferred firearms, that will be conducted without  
5 background checks, waiting periods, and registration of the firearm. By providing a  
6 convenient, public, and transparent venue for gun sales conducted in accordance  
7 with federal and state law, gun shows actually promote lawful commerce in firearms  
8 and thus lawful gun ownership.

9         6. Gun shows afford SAF members a meaningful opportunity to interact  
10 with gun owners and those who hope to become gun owners, to share experiences  
11 and provide information about the Second Amendment.

12         7. SAF has over 700,000 members and supporters nationwide with  
13 thousands in California. The opportunity for them to engage at large-scale events  
14 like gun shows is extremely important to sharing the right to Keep and Bear Arms  
15 message that is essential to SAF's mission.

16         8. SAF also expends resources and time supporting public interest  
17 constitutional litigation to defend its own interests and the interests of its members  
18 and gun owners in general. Gun shows provide a platform for sharing information  
19 about these legal challenges.

20         9. SAF is a proud member and supporter of the "gun culture," which is a  
21 discrete and identifiable group of individuals and organizations. We all share a  
22 desire to exercise the fundamental rights protected by the Second Amendment, and  
23 we seek to participate in public discourse and share in the benefit of a public forum,  
24 like the Orange County Fairgrounds. Participation in this culture with other gun  
25 owners and gun rights organization is one of the primary reasons that SAF members  
26 attend gun shows.

27         10. With the adoption and enforcement of SB 264 and SB 915, SAF,  
28 through its members will sustain, and has in fact already sustained lost opportunities

1 to engage with like-minded individuals and promote its core message of preserving  
2 and defending the Second Amendment.

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

4 Executed within the United States on November 15, 2022.

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*/s/ Alan Gottlieb*

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Alan Gottlieb

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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 ALAN GOTTLIEB 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](mailto: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