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Pacific American Gun Owner Association, Second Amendment Law Center, Inc.

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10 Attorney for Plaintiff Second Amendment Foundation

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

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

20 Plaintiffs,

21 v.

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

28 Defendants.

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

**DECLARATION OF CARL DAWSON  
MICHEL 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 CARL DAWSON MICHEL**

1. I, Carl Dawson Michel, am a Founder, Board Member, and general counsel for Plaintiff Second Amendment Law Center (“2ALC”). 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. 2ALC is a nonprofit organization, incorporated under the laws of Nevada with headquarters in Henderson, Nevada, and registered with the California Secretary of State to do business in the state of California.

3. 2ALC works to advance Second Amendment jurisprudence across the country while educating the public, participating in scholarly research, and providing thought-provoking writings and content to help advance the Second Amendment. 2LC works to support and protect Second Amendment rights across the country.

4. But for the adoption and implementation of Senate Bill 264, 2ALC would participate as a nonprofit vendor 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. 2ALC wishes to have a presence at Plaintiff Crossroads’ gun shows across the state and at the Fairgrounds to promote the preservation and expansion of constitutional and statutory rights of gun ownership, including the right to self-defense and the right to keep and bear arms. We seek to distribute materials at gun shows in California to educate and inform the public about our work in the legal sector to protect their rights.

6. 2ALC also strives to educate and empower gun owners so they can be responsible gun owners and protect themselves and their loved ones. Attending larger events like gun shows will allow our organization the ability to spread our messages about legal issues affecting gun owners in California.

1           7.     2ALC also expends resources and time supporting public interest  
2 constitutional litigation to defend its own interests and the interests of its members  
3 and gun owners in general. Gun shows provide a platform for sharing information  
4 about these legal challenges.

5           8.     2ALC is a proud member and supporter of the “gun culture,” which is a  
6 discrete and identifiable group of individuals and organizations. We all share a  
7 desire to exercise the fundamental rights protected by the Second Amendment, and  
8 we seek to participate in public discourse and share in the benefit of a public forum,  
9 like the Fairgrounds. Participation in this culture with other gun owners and gun  
10 rights organizations is one of the primary reasons that 2ALC supporters attend gun  
11 shows.

12           9.     With the adoption and enforcement of SB 264 and SB 915, 2ALC will  
13 sustain, and has in fact already sustained, lost opportunities to engage with like-  
14 minded individuals and promote its core message of preserving and defending the  
15 Second Amendment.

16           I declare under penalty of perjury that the foregoing is true and correct.  
17 Executed within the United States on November 16, 2022.

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19 \_\_\_\_\_  
20 Carl Dawson Michel  
21 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 CARL DAWSON MICHEL 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