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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 ERIC JOHNSON
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 ERIC JOHNSON

1. I, Eric Johnson, 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 Whittier, California.

3. Before the adoption and implementation of Senate Bill 264, I regularly attended 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”).

4. I am a certified trainer, Range Safety Expert, retired coach, and Chief Range Safety Officer, and I work as a volunteer offering training to scouting groups and gun owners across the state. In these roles, is important for me to participate in events like gun shows, which provide valuable opportunities to educate gun owners and to learn from others while engaging in discussions about firearms, shooting techniques, legal requirements, and the like to enhance my knowledge as a trainer.

5. Indeed, as an instructor it is imperative that I am knowledgeable about firearms, ammunition, and parts of firearms so that I may best educate my students to operate firearms safely and confidently. I gather much of this information from other gun owners, trainers, and vendors at gun shows held at the Fairgrounds.

6. I also enjoyed attending gun shows at the Fairgrounds because these events offer me a unique opportunity to engage with like-minded people to explore and discuss the lawful uses of firearms, including self-defense, hunting, target shooting, safety training, gunsmithing, and general appreciation of firearms. I also enjoy discussing other issues like politics, the Second Amendment, being a gun owner in California, and gun safety with potential customers and other attendees of the show.

7. I also attended gun shows at the Fairgrounds to purchase firearms,

1 ammunition reloading supplies, ammunition, parts for the firearms he owns,
2 materials for caring for his firearms, and much more. As a purchaser of such
3 products at gun shows, I like being able to see firearms up close, to feel how they fit
4 in my hand, and help me make the best decision about what firearm is right for me.
5 Gun shows also provide a unique opportunity to engage with firearm retailers to ask
6 questions about their products and learn from their expertise

7 8. Even when I am not in the market to purchase a firearm or ammunition,
8 being able to speak to the vendors about new products and offerings is important to
9 me as a gun owner and as an instructor. If it is not profitable for vendors to be at a
10 gun show where they can sell their lawful products, I will lose the opportunity to
11 engage these vendors.

12 9. At gun show events, like the Plaintiff Crossroads' gun show at the
13 Fairgrounds, I have engaged with non-profit organizations that have shared
14 information about their programs, given lectures, held training classes, and led
15 discussions about gun rights. Indeed, I often set up and work Plaintiff California
16 Rifle & Pistol Association's nonprofit vendor booth. I enjoy being able to participate
17 in this broad platform event where all of my interests in these areas converge.

18 10. I am a member of the "gun culture," which is a discrete and identifiable
19 group of individuals and organizations, who share a desire to exercise fundamental
20 rights protected by the Second Amendment, and who seek to participate in public
21 discourse and share in the benefit of a public resource, like the Fairgrounds.
22 Participating in that culture with other gun owners and retailers is an important
23 reason that I attend and support gun shows.

24 11. SB 264 and SB 915 diminish my right to engage in otherwise lawful
25 commercial speech in a public forum and restricts my ability to purchase firearms,
26 ammunition, and firearm parts for lawful purposes.

27 12. And because the effect of SB 264 and SB 915 has been to ban gun
28 shows altogether, SB 264 and SB 915 restrict my right to engage with other like-

1 minded people through political and commercial speech.

2 13. But for the adoption and enforcement of SB 264 and SB 915 which
3 prohibits the sale of firearms, ammunition, and firearm precursor parts at the
4 Fairgrounds, I would resume my participation as a trainer and attendee at gun show
5 events at the Fairgrounds.

6 14. If this Court were to enjoin the enforcement of SB 264 and SB 915,
7 allowing Plaintiff Crossroads' gun show events to return to the Fairgrounds, I would
8 resume my participation as a trainer and attendee at gun show events at the
9 Fairgrounds.

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

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

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Eric Johnson
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:

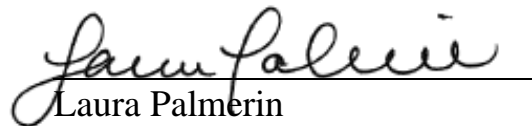
**DECLARATION OF ERIC JOHNSON IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

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