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

28 Defendants.

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

**DECLARATION OF CHAD  
LITRELL 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 CHAD LITRELL**

1. I, Chad Littrell, 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 La Habra, 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. In fact, my former company, Vytamenc 22 Tactical, was a regular vendor at Plaintiff Crossroads’ gun shows at the Fairgrounds. At these events, I would lawfully sell uppers, precursor parts and AR-15 rifles.

5. I have never been arrested or charged with any crime related to my business dealings at gun shows or elsewhere. And I have never had my Federal Firearms License (FFL) revoked or suspended.

6. I enjoy 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. At gun show events, like the Crossroads’ gun shows at the Fairgrounds, I have engaged with non-profit organizations that have shared information about the products I sell. I enjoy being able to participate in this broad platform event where all of my interests in the areas of firearms and the legalities of being a gun owner converge.

8. As a vendor, I offer for sale legal firearm-related products. I also enjoy

1 the unique opportunity that gun shows afford me to interact with my customers in a  
2 meaningful way. Many of my customers come to gun shows to learn about new  
3 technology, speak to vendors, handle merchandise to see what works best for them,  
4 and to participate in discussions about gun ownership.

5 9. I am a member of the “gun culture,” which is a discrete and identifiable  
6 group of individuals and organizations, who share a desire to exercise fundamental  
7 rights protected by the Second Amendment, and who seek to participate in public  
8 discourse and share in the benefit of a public resource, like the Fairgrounds.  
9 Participating in that culture with other gun owners and retailers is an important  
10 reason that I attend and support gun shows.

11 10. That said, if I am unable to sell my products (i.e., uppers, precursor  
12 parts and AR-15 rifles) at the Fairgrounds pursuant to SB 264 and SB 915, there is  
13 no financial incentive for my business to participate as a vendor at Crossroads’ gun  
14 show. Indeed, I rely on product sales at the gun shows to offset the costs of vendor  
15 fees, employee compensation, and necessary overhead.

16 11. SB 264 and SB 915 diminish my ability to carry on lawful commerce  
17 and my ability to engage with others in the dissemination of information that is  
18 related to both my business and the exercise of my constitutional rights under the  
19 First and Second Amendments at the Fairgrounds.

20 12. Worse yet, because Plaintiff Crossroads has been unable to secure dates  
21 to host gun shows at the Fairgrounds since SB 264 took effect, I have been forced to  
22 close my business because my primary outlet for selling my legal products was the  
23 marketplace of the gun shows.

24 13. And because the effect of SB 264 and SB 915 has been to ban gun  
25 shows altogether, SB 264 and SB 915 restrict my right to engage with other like-  
26 minded people through political and commercial speech.

27 14. But for the adoption and enforcement of SB 264 and SB 915 which  
28 prohibits the sale of firearms, ammunition, and firearm precursor parts at the

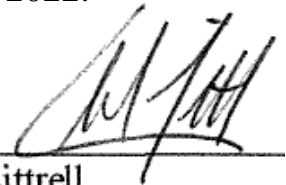
1 Fairgrounds, I would reopen my business and resume my participation as a vendor  
2 and attendee at gun show events at the Fairgrounds.

3 15. If this Court were to enjoin the enforcement of SB 264 and SB 915,  
4 allowing Plaintiff Crossroads' gun show events to return to the Fairgrounds, I would  
5 reopen my business and resume my participation as a vendor and attendee at gun  
6 shows at the Fairgrounds.

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

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

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Chad Littrell  
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 CHAD LITRELL 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