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9  
 10 IN THE UNITED STATES DISTRICT COURT  
 11 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
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14 **B&L PRODUCTIONS, INC., d/b/a**  
 15 **CROSSROADS OF THE WEST, et**  
 16 **al.,**

16 Plaintiffs,

17 v.

18 **GAVIN NEWSOM, et al.,**

19 Defendants.  
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8:22-cv-01518 JWH (JDEx)

**DECLARATION OF JENNIFER  
 OLVERA IN SUPPORT OF STATE  
 DEFENDANTS' OPPOSITION TO  
 MOTION FOR PRELIMINARY  
 INJUNCTION**

Date: January 6, 2023  
 Time: 9:00 a.m.  
 Courtroom: 9D  
 Judge: The Honorable John W.  
 Holcomb  
 Trial Date: TBD  
 Action Filed: August 12, 2022

22 I, Jennifer Olvera, declare as follows:

23 1. I am employed by the 32nd District Agricultural Association (the  
 24 District) as Event Services Supervisor. My duties include supervising the team of  
 25 Event Coordinators, event oversight, working with operations teams to set up and  
 26 tear down shows, event estimating, pre-show contracting, post-show settlements,  
 27  
 28

1 and event booking and sales. I have personal knowledge of the following facts,  
2 and if called as a witness, I could and would testify competently thereto.

3 2. The District is a state institution that is responsible for the OC Fair &  
4 Event Center, in the County of Orange, the City of Costa Mesa (the Fairgrounds).  
5 Its purpose is to hold fairs, expositions, and exhibitions to showcase various  
6 industries and industrial enterprises. It has the authority to enter into contracts with  
7 third-party event organizers to conduct events such as concerts, festivals, and  
8 industry shows at the Fairgrounds.

9 3. B&L Productions, Inc. (B&L) dba Crossroads of the West (Crossroads)  
10 is a repeat client that holds approximately 5 large-scale events (each for a whole  
11 weekend) a year at the Fairgrounds. The events are the same in nature: a gun  
12 show, with numerous vendors that serve food, sell firearm accessories and gear,  
13 offer firearms related training and information, and sell firearms, precursor parts,  
14 and ammunition.

15 4. The standard procedure for a returning client, such as Crossroads, to  
16 reserve the Fairgrounds, starts with a client representative contacting the Event  
17 Services Department of the District. Given the scale of Crossroads' events, it is  
18 preferred for dates to be reserved at least one year in advance. The Event Services  
19 Department would typically respond to the client representative within three to five  
20 days. Once dates are finalized, the Event Services Department drafts a rental  
21 agreement, which details the services and facilities provided, along with the costs.  
22 Finalizing a rental agreement for execution typically takes six to eight months.  
23 After full execution of the agreement, the Event Services Department continues to  
24 prepare for the event, making sure that the required insurance, payment, permits,  
25 and necessary staff, among other things, are accounted for.

26 5. On July 20, 2021, Tracy Olcott from Crossroads contacted me via e-mail,  
27 to reserve five weekends for gun shows in 2022. I responded the next day that four  
28

1 out of the five weekends were available and that we would put those dates on hold  
2 for them.

3 6. On October 8, 2021, SB 264 was signed into law.

4 7. On December 3, 2021, Ms. Olcott followed up via e-mail to me about the  
5 event dates and asked if the rental contracts could be prepared by the end of 2021. I  
6 did not respond at that time, as our staff was in the midst of considering what, if  
7 any, impact SB 264 would have on Crossroads' reservations.

8 8. Plaintiff B&L commenced this lawsuit on August 12, 2022, and the  
9 District is named as one of the defendants.

10 9. Crossroads has not made any inquiries to the District since December 3,  
11 2021, about reserving dates for its events.

12 10. If contacted, the District will coordinate with Crossroads in reserving the  
13 Fairgrounds for events. As is true for any event promoter, any reservation made by  
14 Crossroads would be contingent on its event complying with all applicable laws,  
15 including SB 264 (Penal Code § 27575) and SB 915 (Penal Code § 27573).

16  
17 I declare under penalty of perjury under the laws of the United States that the  
18 foregoing is true and correct.

19 Dated Dec 9, 2022, at Costa Mesa, California.

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21   
22 Jennifer Olvera

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## CERTIFICATE OF SERVICE

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

I hereby certify that on December 9, 2022, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

### DECLARATION OF JENNIFER OLVERA IN SUPPORT OF STATE DEFENDANTS' OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on December 9, 2022, at Los Angeles, California.

\_\_\_\_\_  
Carol Chow  
Declarant

\_\_\_\_\_  
*/s/Carol Chow*  
Signature

SA2022303648