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

12 **B&L PRODUCTIONS, INC., d/b/a**
 13 **CROSSROADS OF THE WEST, et**
 14 **al.,**

Plaintiffs,

15 v.

16 **GAVIN NEWSOM, et al.,**

17 Defendants.

8:22-cv-01518 JWH (JDEx)

**DECLARATION OF MICHELE
 RICHARDS IN SUPPORT OF
 STATE DEFENDANTS' MOTION
 FOR RECONSIDERATION OF
 STAY OF INJUNCTION PENDING
 APPEAL**

Date: December 15, 2023
 Time: 9:00 a.m.
 Courtroom: 9D
 Judge: The Honorable John W.
 Holcomb
 Action Filed: August 12, 2022

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 21 I, Michele Richards, declare as follows:

22 1. I am the Chief Executive Officer of the 32nd District Agricultural
 23 Association (the District). My duties include executive oversight of the operations
 24 and staff of the 32nd District Agricultural Association (OC Fair & Event Center). In
 25 addition, I manage the priorities of the District Board of Directors and work with
 26 them to develop strategic direction for the organization. I ensure that policies are in
 27 place to govern the organization and that the District's finances are well-managed.
 28 I have knowledge of the following facts based on the review of the District's

1 business records or my personal knowledge, and if called as a witness, I could and
2 would testify competently thereto.

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

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

14 4. On October 30, 2023, Tracy Olcott from B&L Productions contacted our
15 office via email requesting the following dates in 2024 for B&L Productions to host
16 gun shows: January 12-14, 2024; March 1-3, 2024; June 1-3, 2024; August 23-25,
17 2024; and November 29-December 1, 2024. Our office responded by phone on
18 November 2, 2023, providing the following dates: January 20-22, 2024; March 30-
19 31, 2024; and November 29-December 1, 2024.

20 5. After further correspondence, the District currently expects that B&L
21 Productions will host gun shows on the following dates: January 20-22, 2024;
22 March 30-31, 2024; and November 29-December 1, 2024. Currently, a rental
23 agreement for the January 20-22, 2024 show is being developed, and the rental
24 agreements for the other event dates are forthcoming.

25 6. Even if SB 264 and SB 915 are in effect and the sale of firearms,
26 ammunition, and precursor parts are prohibited, gun shows may still take place at
27 the Fairgrounds as long as promoters follow all applicable federal and state laws
28 and court orders.

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

Dated 11/7/23, at Costa Mesa, California.



Michele Richards

SA2022303648

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 November 13, 2023, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

DECLARATION OF MICHELE RICHARDS IN SUPPORT OF STATE DEFENDANTS' MOTION FOR RECONSIDERATION OF STAY OF INJUNCTION PENDING APPEAL

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 November 13, 2023, at Los Angeles, California.

Kevin Carballo
Declarant

Kevin Carballo
Signature

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