



*TKC Enterprises, Inc.
Executive Consulting
Organizational Security and
Investigative Services*

November 1, 2022

To: Stacy Rianda, CEO
31st District Agricultural Association
Ventura County Fair Grounds

From: Tom Cady - Via: email

RE: Compliance Monitoring - Crossroads of the West Gun Show October 22/23 2022

Pursuant to a consulting agreement with the 31st District Agricultural Association I provided compliance monitoring for the Crossroads of the West Gun Show October 22 and 23, 2022 at the Ventura County Fairgrounds. As with prior shows at the Ventura Fair Grounds, the Agreement required compliance monitoring for the operation of the show to ensure conditions placed on the show operator (Crossroads of the West) by the Fair Board were implemented and followed during the show.

On Saturday October 22, 2022 I arrived on site at approximately 8:00 am to observe the vendor setup and pre-show security deployment. Upon arrival I met with Rob Templeton, the operator from Crossroads of the West for the show and began a visual check of the show's operational areas.

I contacted the supervisor for the security team and determined that they had the first two guards at the front entrance and the vendor access entrance which are the key early deployment areas. He had radios for all of the guard positions and had one for me to use during the show. By a little after 8:30 am he had all of the security staff on-site and being deployed to their positions.

On this weekend the gun show was the only special activity at the Fair Grounds so there would be less cross traffic to deal with. I did speak to Mr. Templeton regarding the anticipated crowd since this was the last show occurring at the Ventura Fair Grounds due a recently adopted law prohibiting gun shows on State property beginning January 1, 2023. Mr. Templeton thought the crowd could be large because of the recent gun show law but they (Crossroads) have other shows on their calendar in California, including one in Bakersfield before the end of 2022. Additionally, we discussed the vendors and determined all of them been to shows at the Ventura Fairgrounds previously so they were familiar with the additional requirements at this location.

I checked the vendor areas in both San Miguel and Anacapa buildings where some vendors were still setting up. Most of the gun vendors were already setup or were in the process of cabling the weapons. I checked with the vendor access guard and made sure they were monitoring the access wristbands.

I then went to gun check table at the entrance to the gun show location. I checked with the guard regarding his processes and he was aware of the need to check any weapons coming in, check that they were unloaded and complete a tag with the concealed weapons permit information before attaching it

to the zip tie placed in the action for the weapon. He also was aware that the patrons were to leave the area before reloading their weapon.

The Crew Protection supervisor contacted me and gave me a radio. I reminded him that the vendors were not supposed to be drinking alcohol in their sales booths so the rover guards should help check compliance particularly around lunch time.

I then did a visual check of the vendors in Anacapa and San Miguel Halls for compliance with the weapons securing provisions in the operational agreement with the Fairgrounds. All appeared to be in compliance. A number of vendors at this show were setup to sell ammunition. Two had a wide variety of ammunition only for sale and appeared to have complete wholesale pricing. Other vendors had more limited quantities of ammunition for sale although at a higher price and in combination with other items. All the vendors had the instant check system to validate purchasers. Over the full course of the show I did spot checks of the vendors do ammo sales to observe if they were doing the required ID and Department of Justice checks.

I subsequently did a recheck of the gun check table and checked with the event and security staff working there. A guard was walking the entrance line advising individuals waiting to enter the show regarding the gun check requirement. The armed guards working the gun check desk were also doing a good job in verbally catching people coming in with a firearm so they can be tagged and disabled with a zip ties or taken back out to the person's vehicle.

While at the table I observed a patron unloading his weapon in what I thought was an unsafe manner. He had a small semiautomatic pistol from which he ejected the loaded clip and then turned his back to the guard at the table. He ejected the round from the chamber but was holding it near his abdomen as he checked to make sure the weapon was clear of any rounds. The guard was busy tagging a weapon in the possession of a second person going through the unloading and tagging process. I spoke with the security supervisor about moving the gun check table off the cement area where it was located and onto grass where if someone was checking to clear their weapon it could be done on the grass and slowing down to be sure the process was safe.

The required education area as specified in Exhibit G was setup in at the back wall area in Anacapa and there was also a gun safety certification booth inside Anacapa Hall. There were also two vendors (one from Ojai and one from Santa Barbara) offering range training to attendees.

In checking the displays in the halls I noted that some of the vendors selling custom rifle barrel assemblies were again cabling their display items even though this was not a requirement. The custom barrel assemblies cost more than some handguns and the cabling was a good loss prevention measure.

Mr. Templeton and his staff were very helpful in advising the vendors that there were other gun shows coming up and their compliance / cooperation here was critical to avoiding a shutdown of this show.

In compliance with the conditions for the show none of the vendors had lower receivers or blanks for sale. The vendor who had drilling jigs for the accurate manufacture of lower receivers was not at the show. The primary custom parts vendors at the show were selling stocks, clips and barrels. This was another focus area for compliance.

Throughout the show I also monitored the display halls exits to help ensure no purchased weapons left the premise. All vendors appeared to be complying with the waiting period and purchasers were going to the federal firearms dealer desk to record their purchase/s. A number of patrons came up to the main desk to check on the process for purchasing firearms and appeared to want to be sure a transfer station was available to handle any purchase they made.

On Sunday I was on site at 8:15 am and noted that a few vendors were late in getting setting up for full activation before the 9:00am opening time. Some of these vendors were in the process of cabling all of their firearms but most of the gun dealers had their merchandize secured. The opening crowd for Sunday was very light and all of the vendors were cooperative in completing the required work by around 9:05 am.

I spoke with the security unit supervisor and determined all of the guard posts were staffed. I received my radio from the supervisor and he wondered how the Ventura Officer who had shot himself the previous day was doing. I told him that I did not know anything about the incident. (He could see that I was concerned about the delay in being notified about the incident). He said he thought it was either Jason Amelio or I who had told him about incident on Saturday but he did not know which. He said what he had been told was that a parking lot guard heard a noise in the lot around 11:20-11:30 am but did not see any unusual activity and did not know the source of the noise. Later a Ventura Police unit came into the lot and the officer advised the guard that was investigating an accidental discharge that occurred in the lot. The person had been in his vehicle when he shot himself and then drove to a nearby hospital. The parking lot guard told the officer about the he had heard.

I checked with the Ventura Police Chief to find out how his officer was doing. He got back to me indicating that the involved party was a Custody Officer for the Probation Department and the officer was doing fine. He confirmed that it was an accidental discharged self-reported by the involved individual.

Around 9:50am on Sunday I received a call from Jason Amelio who had been working on Saturday and he briefly described what he knew about the incident. The noise in the lot was heard by a guard who was assigned to the lot as a separate assignment from the gun show deployment but from the same security company (I was not aware of this deployment). A Ventura Police Officer had come to the lot to investigate an accidental discharge where the person shot themselves. The individual then drove himself to the hospital and self-reported the incident.

Jason did not tell me about the incident on Saturday but I subsequently determined that the individual was a Correction Officer from the California Youth Authority (CYA) which has a facility in Camarillo. CYA Correction Officers are peace officers under California Law but do not carry their firearm as part of their normal work duties so they may not have the familiarity with a firearm as other peace officers. The Correction Officer was placing his weapon in his holster while seated in the car when the gun went off striking him in the leg. Holstering a firearm while seated in these circumstances is not a safe practice. Because he was inside his vehicle would account for why the security officer did not hear a louder report when the gun discharged.

After learning about the incident, on Sunday morning I double checked with the guards at the weapons check table to be sure they were telling patrons to leave the property before reloading their weapons. They indicated that were giving the notification and thought they were getting total compliance at least to the fairgrounds entrance since they could watch the patrons to that point.

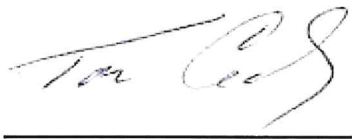
I was subsequently advised by Chief Schindler from Ventura Police Department and that no call was made to the California Highway Patrol when the incident occurred and they had not responded to the fairgrounds after they were advised about the incident by Ventura PD. Ventura sent a courtesy copy of the report to the Highway patrol after their investigation.

The crowd for the show on both days was lighter than I thought it would be due to the recent signing by the Governor of the State Bill prohibiting gun shows on State property. The ammo lines were busy but also not to the extent I thought would be the case. However, with several ammo vendors at the show patrons had multiple purchasing options.

Toward the end of the show the roving guards were making frequent checks through Anacapa and San Miguel as the vendors were breaking down their booths. This helps in deterring any thefts when the operators were loading out their items.

No other significant incidents were reported to me during the show.

Thank you for the opportunity to provide services to Association.

A handwritten signature in black ink, appearing to read "Tom Cady", written over a horizontal line.

Tom Cady, President

TKC Enterprises



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November 10, 2022

To: Stacy Rianda, CEO
31st District Agricultural Association
Ventura County Fair Grounds

From: Tom Cady - Via: email

RE: Gun Show Compliance Monitoring Summary Report

The legislative prohibition to gun shows on State property is under court challenge so I have been asked to summarize the key compliance provisions that have been put into place by the Ventura Fairgrounds in case there is an adverse court ruling to the prohibition and the issue of shows returns.

Through a consulting agreement I have provided compliance monitored at the Crossroads of the West gun shows at the Fairgrounds in October 2021, March, August and October 2022. Through the provisions in the rental agreement the Fairgrounds Board has established a strong set of conditions governing the operation of gun shows.

While almost all of the rules and regulations incorporated in these conditions were the same throughout all of the shows there was an additional masking requirement for everyone attending the October 2021 show because of County COVID restrictions. As long as patrons were made aware that the show would be stopped if the mask requirement was not followed they complied. There were only a couple of people who made an issue regarding the masks but the vast majority complied following notification of the requirement.

The physical layout of the fairgrounds does reduce the options for routing foot traffic on the grounds when there are multiple events occurring. When there are additional events in the fair buildings to the North of the gun show foot traffic is generally routed through the parking area used by vendor. This leads to patrons for the other events mixing with the vendors which is not ideal. During future remodeling, perhaps additional entrances or fenced pathways can be considered to better facilitate patron flow.

The cabling of firearms, restrictions on "ghost gun" parts and other restrictions that are currently in place appear to be effective in preventing the theft of weapons and the availability of illegal weapons without diminishing the number of vendors or patrons. I am not sure if there was any impact on overall sales.

Another California law under legal review is the restriction on weapon magazine capacity. Depending on how the court decides on this case firearm monitoring vendors for the sale of magazines may well need to be considered.

Due the cost of ammunition and the number of calibers desired by patrons it is likely any future gun show will continue to have significant amounts of ammunition sales. Monitoring the vendors for the instant background check for ammo purchases will likely continue to be an area for the monitoring focus.

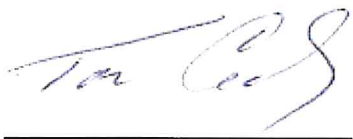
The minimum number of security guards, required positions and post orders should be reviewed. The vendor could hire additional guards but should be required to meet the minimums established by the Fair Board. Additionally, expectations regarding the reporting of incidents to the show operator should be included in the post orders to all guards on the premise.

With our unfortunate experience with the accidental discharge during the October 2022 show consideration should be given to preparing a printed notice to be handed out to patrons regarding the restrictions on having loaded handguns at the show as well as unloading and loading expectations. This would not replace the verbal interaction that happens at the gun check table simply supplement and memorialize the directions.

Regardless of any gun show decision, the Fair Board and Manager may want to formalize an agreement with Ventura Police Department and the CHP regarding police responses to the Ventura Fairgrounds and jurisdiction for the handling of investigations. There seems to be confusion around which is the primary responding agency and, with their staffing levels, the CHP has difficulty in achieving a timely response. While 911 calls from the fairgrounds currently go the CHP in case of an emergency Ventura Police can be reached through their 10 digit emergency call line.

Finally, it is difficult to predict if a court ruling will speak to regulations on the operation of shows when the prohibition case is fully litigated so some collaboration between the various State venues regarding regulations might be called for.

Thank you for the opportunity to provide services to Association.

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Tom Cady, President

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