

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

GUN OWNERS)	
OF AMERICA, INC., <i>et al.</i> ,)	
)	
Plaintiffs,)	Civil Action No. 18-cv-__
)	
v.)	
)	
MATTHEW WHITAKER, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

Verified Declaration of Timothy Harmsen

1. My name is Timothy Harmsen. I am a U.S. citizen and resident of Valparaiso, Indiana. I make this declaration in support of the Complaint and Motion for Preliminary Injunction. If called as a witness, I can testify to the truth of the statements contained therein.

2. I possess bump stocks, and would like to have the freedom to purchase bump stocks in the future. If the injunction is not granted, I will be irreparably harmed, as I will have no choice but to either destroy or surrender my valuable personal property, and will lose the monetary value of that property. If I choose not to comply, I will face potential federal felony criminal charges.

3. I am the founder and host of the Military Arms Channel on YouTube, and I make a living in part from income derived from that work. Several of my videos include content about bump stocks and bump firing, which is a topic of great interest to my viewers and regarding which I have gained a sizable following. If bump stocks are banned, I will be unable to have any further videos on bump stocks, and this component of my audience will not be served and may not continue to follow my work. Therefore, if the injunction is not granted, my number of viewers no doubt will be affected, causing me irreparable harm.

I, Timothy Harmsen, certify under penalty of perjury that the foregoing is true and correct.

Tim Harmsen

Timothy Harmsen

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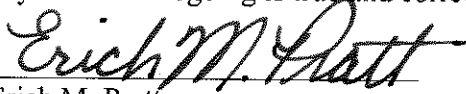
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)	
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Verified Declaration of Erich M. Pratt

1. My name is Erich M. Pratt. I am a U.S. citizen and resident of Burke, Virginia. I make this declaration in support of the Complaint and Motion for Preliminary Injunction. If called as a witness, I can testify to the truth of the statements contained therein.

2. I am the Executive Director of Gun Owners of America, Inc. and Executive Vice President of Gun Owners Foundation. These two organizations together have more than 1,500,000 members and supporters, many of whom reside in this district, and many of whom possess bump stocks and will be irreparably harmed if the injunction is not granted. Our members and supporters possess bump stocks, and would like to have the freedom to purchase bump stocks in the future. If the injunction is not granted, they will be irreparably harmed, as they will have no choice but to either destroy or surrender their valuable personal property, and will lose the monetary value of that property. If they choose not to comply, they will face potential federal felony criminal charges.

I, Erich M. Pratt, certify under penalty of perjury that the foregoing is true and correct.


Erich M. Pratt

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

GUN OWNERS

OF AMERICA, INC., *et al.*,

Plaintiffs,

v.

MATTHEW WHITAKER, *et al.*,

Defendants.

Civil Action No. 18-cv-____

Verified Declaration of Rachel Malone

1. My name is Rachel Malone. I am a U.S. citizen and resident of Manor, Texas. I make this declaration in support of the Complaint and Motion for Preliminary Injunction. If called as a witness, I can testify to the truth of the statements contained therein.

2. Although I do not currently own any bump stocks, I had planned to purchase a bump stock prior to learning that ATF may change its position and declare them firearms, as I do not wish to lose the money that I would have spent in purchasing one. If the regulations are invalidated, I plan to purchase a bump stock in the future. If the injunction is not granted, I will be irreparably harmed, as the ATF regulation will prohibit me from purchasing or possessing a bump stock.

I, Rachel Malone, certify under penalty of perjury that the foregoing is true and correct.


Rachel Malone

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Defendants.

Civil Action No. 18-cv-____

Verified Declaration of Matthew Watkins

1. My name is Matthew Watkins. I am a U.S. citizen and resident of Hudsonville, Michigan located in the counties under the authority of the U.S. District Court for the Western District of Michigan. I make this declaration in support of the Complaint and Motion for Preliminary Injunction. If called as a witness, I can testify to the truth of the statements contained therein.

2. I possess bump stocks, and would like to have the freedom to purchase bump stocks in the future. If the injunction is not granted, I will be irreparably harmed, as I will have no choice but to either destroy or surrender my valuable personal property, and will lose the monetary value of that property. If I choose not to comply, I will face potential federal felony criminal charges. If the injunction is not granted I will also be denied the ability to use my bumpstock in a fixed non-reciprocating mode.

I, Matthew Watkins, certify under penalty of perjury that the foregoing is true and correct.


Matthew Watkins

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

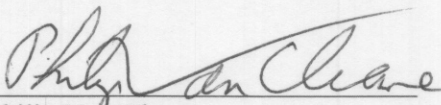
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MATTHEW WHITAKER, <i>et al.</i> ,)	
)	
Defendants.)	
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Verified Declaration of Philip Van Cleave

1. My name is Philip Van Cleave. I am a U.S. citizen and resident of Newington, Virginia. I make this declaration in support of the Complaint and Motion for Preliminary Injunction. If called as a witness, I can testify to the truth of the statements contained therein.

2. I am the President of Virginia Citizens Defense League. Many members of VCDL, including myself, possess bump stocks, and would like to have the freedom to purchase bump stocks in the future. If the injunction is not granted, these members will be irreparably harmed, as they will have no choice but to either destroy or surrender their valuable personal property, and will lose the monetary value of that property. If they choose not to comply, they will face potential federal felony criminal charges. Thus, many of our organization's members will be irreparably harmed if the injunction is not granted.

I, Philip Van Cleave, certify under penalty of perjury that the foregoing is true and correct.


Philip Van Cleave