

EXHIBIT 3

No. 15-2234

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MATTHEW GRACE and)	
PINK PISTOLS,)	
)	
Plaintiffs,)	
)	Civil Action No. 15-2234 (RJL)
v.)	
)	
DISTRICT OF COLUMBIA and)	
CATHY LANIER, in her official capacity as)	
Chief of Police for the Metropolitan Police)	
Department,)	
)	
Defendants.)	

DECLARATION OF MATTHEW GRACE

I, Matthew Grace, am competent to state, and declare the following based on my personal knowledge:

1. I am a citizen of the United States and a resident of Washington, D.C.
2. I am a law-abiding, responsible person over 21 years of age. I attended school in the District at Gonzaga College High School and The Catholic University of America. I work as a financial advisor and I am also an owner of a company that owns and manages rental real estate in the District. I am a member of Pink Pistols.
3. I am fully qualified to possess handguns under federal and District of Columbia law. I currently own four handguns that are lawfully registered with the District of Columbia. I keep these handguns in my home, and I desire to carry them outside the home for self-defense. I have completed the firearms training that is required to obtain a District of Columbia concealed carry license.

4. I hold concealed carry permits issued by Virginia and Utah. In light of State reciprocity rules, I lawfully may carry a firearm in the majority of the States in the United States. But because of the District of Columbia's restrictions on carrying firearms, I cannot do so in my home city, the District of Columbia.

5. On one occasion, gun shots were fired in front of my home and four shell casings were found directly in front of my home on the sidewalk. There was a person carrying a firearm in my neighborhood robbing people at gunpoint who was never caught. My wife was robbed on a public street in the District in broad daylight.

6. I currently refrain from carrying a firearm for fear of being prosecuted, convicted, and imprisoned for violating the District of Columbia's laws making carrying a firearm in public a crime.

7. In August 2015, I applied for a District of Columbia concealed carry license. I did not then, and do not now, have a "special need for self-protection distinguishable from the general community" or any other "proper reason" to carry a firearm, as defined by District of Columbia laws. In the space provided to support my application, I cited the Second Amendment right to carry a firearm.

8. The District denied my application on October 19, 2015. A true and correct copy of the letter denying my concealed carry application is attached as Exhibit 4 to the application for a preliminary injunction.

9. The denial letter stated that I had failed to "[d]emonstrate a good reason to fear injury to person or property, or other proper reason for a concealed carry license." The letter stated: "Specifically the applicant did not meet the minimum requirement of showing: 'a special need for self-protection distinguishable from the general community as supported by evidence of

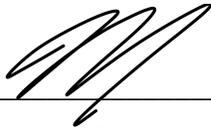
specific threats or previous attacks that demonstrate a special danger to the applicant's life,' . . . and did not demonstrate '[e]mployment of a type that requires the handling of large amounts of cash or other highly valuable objects that must be transported upon the applicant's person.' ”

10. No reason was given for the denial of my application other than the failure to meet the “proper reason” requirement. I meet all of the other requirements for a concealed carry license.

11. In light of the District's denial of my application, I continue to refrain from carrying a firearm outside the home for self-defense in the District. I would carry a firearm in public for self-defense in the District were it lawful for me to do so.

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

Executed this 23rd day of December, 2015 in Washington, DC.



Matthew Grace