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 14 Intervenor National Rifle Association  
 of America and Safari Club International

15 **IN THE UNITED STATES DISTRICT COURT**  
 16 **FOR THE DISTRICT OF ARIZONA**  
 17 **PRESCOTT DIVISION**

18 Center for Biological Diversity, et al.,

19 Plaintiffs,

20 vs.

21 United States Forest Service,

22 Defendant, and

23 National Rifle Association of America  
 24 and Safari Club International,

25 Proposed Defendant-  
 26 Intervenor.

CASE NO. 3:12-cv-08176-PCT-SMM

**DECLARATION OF TODD GEILER  
 IN SUPPORT OF MOTION FOR  
 LEAVE TO INTERVENE**

**DECLARATION OF TODD GEILER**

1  
2 I, TODD GEILER, O.D., declare as follows:

3       1.     I am an Arizona resident and I have resided in Arizona for 52 years.

4       2.     I am a current life member of the National Rifle Association at the  
5 Benefactor level.

6       3.     I have been hunting for 47 years. I have personally hunted in the areas  
7 known as the Kaibab National Forest (Kaibab 12A), the Arizona Strip (13A/B) and the  
8 Vermillion Cliffs (12B) since childhood. I did not successfully draw a deer tag in this  
9 year’s Arizona Game & Fish Big Game drawing. However, I will be predator and coyote  
10 hunting throughout the winter months in various game management units, 12 A/B, 13 A/B,  
11 which includes the Kaibab National Forest . When I am not able to travel to the north end  
12 of Arizona, I will predator hunt in units 9 and 10. On occasion, I will be hunting mountain  
13 lions as well.

14       4.     Hunting is a longstanding family tradition in the State of Arizona and in the  
15 Kaibab National Forest, the Arizona Strip and Vermillion Cliffs. My family first became  
16 involved in this tradition with my great grandfather, S. Gustaf Anderson, around 1900 and  
17 the tradition of hunting this vast land continues today. I have family friends and have met  
18 hunters that I know who have continued such family traditions on the “Kaibab”, the  
19 “Strip”, and the “Cliffs” as long as my family has.

20       5.     I am an active competitive pistol and rifle shooter for the last 39 years. I was  
21 a member of the National Developmental Pistol Team and have currently returned high  
22 power rifle competitions as well. I have an extensive knowledge about bullet flight  
23 ballistics, flight and terminal ballistics, both at the shooting range and in the field while  
24 hunting. I prefer ammunition containing lead bullets for hunting and target shooting and  
25 would not use ammunition with non-lead bullets. Currently, non-lead bullets used for  
26 reloading do not have the in-flight ballistics (i.e., ballistic coefficients) or the established  
27 record of accuracy at long distances in my opinion. You will not find non-lead bullets used  
28 in any long range rifle competition. During the bullet manufacturing process, the copper

1 jacket is drawn and formed with a punch press. Once the copper jacket is drawn, a lead  
2 core is then hydraulically pressed into the nose opening after which the nose of the bullet is  
3 formed around lead core. The concentricity tolerances are to near 1/10,000th of an inch.

4 6. Most of the hunting I do on the Kaibab National Forest, Arizona Strip, or the  
5 Vermillion Cliffs involves long-distance shots and my rifle is calibrated for shots from 100  
6 to 600-yards. As a responsible sportsman, I feel it is my ethical duty and responsibility to  
7 require the utmost from myself, my rifle and my equipment. As bullet development has  
8 evolved, so have the technologies. It does not matter whether one reloads cartridges using  
9 bullets manufactured by Berger, Hornaday, Nosler, Sierra or Swift Bullet Company. The  
10 manufacturing process is proprietary but end point is the same. A shooter/hunter needs a  
11 bullet that will hold together and give the marksmen the utmost accuracy. Advancements  
12 in these technologies have developed hunting bullets where we now have bonded lead  
13 cores to the copper jackets increasing bullet weight retention in the terminal shot phase.  
14 These bonded bullets achieve 80 percent weight retention when recovered from downed  
15 big game animals. This translates to 80 percent less free lead in the environment.

16 7. I oppose any and all proposed prohibitions and/or restrictions on the use  
17 of lead ammunition for hunting and the shooting sports on the Kaibab (12A), Arizona Strip  
18 (13A/B), Vermillion Cliffs (12B) as well as the adjacent hunt units 9, 10, 18A and unit 15  
19 in totality, barring solid, trustworthy scientific evidence showing such a need.


20

21 In accordance with 28 U.S.C. §1746, I declare under penalty of perjury that the  
22 foregoing is true and correct.

23 Dated this 11 day of April, 2016, at 1300 Hqs, Arizona. Prescott

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TODD GEILER, O.D.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of April, 2016, I electronically transmitted the foregoing Declaration to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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/s/ Douglas S. Burdin  
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