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10 Attorneys for Proposed Defendant-
11 Intervenor National Rifle Association
12 of America

13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE DISTRICT OF ARIZONA
15 PRESCOTT DIVISION

16 Center for Biological Diversity, et al.,) CASE NO. 3:12-cv-08176-PCT-SMM
17 Plaintiffs,) **DECLARATION OF TODD GEILER**
18 vs.) **IN SUPPORT OF MOTION FOR**
19 United States Forest Service,) **LEAVE TO INTERVENE**
20 Defendant, and)
21 National Rifle Association of America)
22 and Safari Club International,)
23 Proposed Defendant-)
24 Intervenor.)

25 **DECLARATION OF TODD GEILER**

26 I, TODD GEILER, O.D., declare as follows:

- 27 1. I am an Arizona resident and I have resided in Arizona for 49 years.
28 2. I am a current life member of the National Rifle Association at the Benefactor level.
3. I have been hunting for 43 years. I have personally hunted in the areas known as the Kaibab National Forest (Kaibab 12A), the Arizona Strip (13A/B) and the Vermillion Cliffs (12B) since childhood. I did not successfully draw a deer tag in this year's Arizona Game & Fish Big Game drawing. However, I will be predator and coyote hunting

1 throughout the winter months in various game management units, 12 A/B, 13 A/B, which
2 includes the Kaibab National Forest . When not able to travel to the north end of Arizona,
3 will predator hunt in units 9 and 10. On occasion, I will be hunting mountain lions as well.

4 4. Hunting is a longstanding family tradition in the State of Arizona and in the
5 Kaibab National Forest, the Arizona Strip and Vermillion Cliffs. My family first became
6 involved in this tradition with my great grandfather, S. Gustaf Anderson, around 1900 and
7 the tradition of hunting this vast land continues today, I have family friends and have met
8 hunters that I know who have continued such family traditions on the "Kaibab", the
9 "Strip", and the "Cliffs" as long as my family has.

10 5. I am an active competitive pistol and rifle shooter for the last 35 years. I was a
11 member of the National Developmental Pistol Team and have currently returned high
12 power rifle competitions as well. I have an extensive knowledge about bullet flight
13 ballistics, flight and terminal ballistics, both at the shooting range and in the field while
14 hunting. I prefer ammunition containing lead bullets for hunting and target shooting and
15 would not use ammunition with non-lead bullets. Currently, non-lead bullets used for
16 reloading do not have the in-flight ballistics (i.e., ballistic coefficients) or the established
17 record of accuracy at long distances in my opinion. You will not find non-lead bullets used
18 in any long range rifle competition. During the bullet manufacturing process, the copper
19 jacket is drawn and formed with a punch press. Once the copper jacket is drawn, a lead
20 core is then hydraulically pressed into the nose opening after which the nose of the bullet is
21 formed around lead core. The concentricity tolerances are to near 1/10,000th of an inch.

22 6. Most of the hunting I do on the Kaibab National Forest, Arizona Strip, or the
23 Vermillion Cliffs involves long-distance shots and my rifle is calibrated for shots from 100
24 to 600-yards. As a responsible sportsman, I feel it is my ethical duty and responsibility to
25 require the utmost from myself, my rifle and my equipment. As bullet development has
26 evolved, so have the technologies. It does not matter whether one reloads cartridges using
27 bullets manufactured by Berger, Hornaday, Nosler, Sierra or Swift Bullet Company. The
28 manufacturing process is proprietary but end point is the same. A shooter/hunter needs a


1 bullet that will hold together and give the marksmen the utmost accuracy. Advancements
2 in these technologies have developed hunting bullets where we now have bonded lead
3 cores to the copper jackets increasing bullet weight retention in the terminal shot phase.
4 These bonded bullets achieve 80 percent weight retention when recovered from downed
5 big game animals. This translates to 80 percent less free lead in the environment.

6 7. I oppose any and all proposed prohibitions and/or restrictions on the use
7 of lead ammunition for hunting and the shooting sports on the Kaibab (12A), Arizona Strip
8 (13A/B), Vermillion Cliffs (12B) as well as the adjacent hunt units 9, 10, 18A and unit 15
9 in totality, barring solid, trustworthy scientific evidence showing such a need.

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

Dated this 11th day of OCTOBER, 2012, at PRESCOTT, Arizona.



TODD GEILER, O.D.

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of November, 2012, I electronically transmitted the Declaration of Todd Geiler in Support of Motion for Leave to Intervene 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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