

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

GREGORY T. ANGELO, ET AL.

Plaintiffs,

v.

DISTRICT OF COLUMBIA, ET AL.

Defendants.

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Civil Action No. 22-cv-1878 RDM

STATEMENT OF MATERIAL FACTS NOT IN DISPUTE

Plaintiffs, by counsel, pursuant to the presiding Judge's July 15, 2022 minute order provides its statement of material facts in support of entry of a permanent injunction against enforcement of DC Code Section 7-2509.07(a)(6).

1. The Metro system is a system of public transportation in the Washington, DC metropolitan area, including in the District of Columbia and parts of Maryland and Virginia. DC Code Section 7-2509.07(a)(6).
2. DC Code Section 7-2509.07(a)(6) prohibits DC licensed concealed carriers from carrying handguns on Metro vehicles or Metro stations within the District of Columbia. DC Code Section 7-2509.07(a)(6).
3. The Metro system has no rules against firearm carry on Metro vehicles or in Metro stations. *See* <https://wmata.com/rider-guide/rules/>.
4. The Commonwealth of Virginia does not prohibit carry of handguns on public transportation vehicles, including on the Metro system by persons having a permit or license issued by any state authorizing the concealed carry of a handgun. *See generally* Code of Virginia.

5. The State of Maryland does not prohibit carry of handguns on public transportation vehicles by persons holding a Maryland wear and carry permit. *See generally* Maryland Code.
6. Plaintiff Angelo is a District of Columbia resident. ECF 6-2.
7. Plaintiff Angelo holds a District of Columbia license to carry a concealed handgun. ECF 6-2.
8. Plaintiff Angelo is a regular rider of the Metro system. ECF 6-2.
9. Plaintiff Angelo would carry a handgun for concealed for personal protection on the Metro system if DC Code Section 7-25509.07(a)(6) were invalidated as unconstitutional. ECF 6-2.
10. Plaintiff Yzaguirre is a District of Columbia resident. ECF 6-3.
11. Plaintiff Yzaguirre holds a District of Columbia license to carry a concealed handgun. ECF 6-3.
12. Plaintiff Yzaguirre is a regular rider of the Metro system. ECF 6-3.
13. Plaintiff Yzaguirre would carry a handgun concealed for personal protection on the Metro system if DC Code Section 7-25509.07(a)(6) were invalidated as unconstitutional. ECF 6-3.
14. Plaintiff Miller is a Virginia resident. ECF 6-4.
15. Plaintiff Miller holds a District of Columbia license to carry a concealed handgun. ECF 6-4.
16. Plaintiff Miller is a regular rider of the Metro system. ECF 6-4.

17. Plaintiff Miller would carry a handgun concealed for personal protection on the Metro system if DC Code Section 7-25509.07(a)(6) were invalidated as unconstitutional. ECF 6-4.
18. Plaintiff Erickson is a District of Columbia resident. ECF 6-5.
19. Plaintiff Erickson holds a District of Columbia license to carry a concealed handgun. ECF 6-5.
20. Plaintiff Erickson is a regular rider of the Metro system. ECF 6-5.
21. Plaintiff Erickson would carry a handgun concealed for personal protection on the Metro system if DC Code Section 7-25509.07(a)(6) were invalidated as unconstitutional. ECF 6-5.
22. The Metro system does not screen riders of Metro trains or Metro busses or persons entering Metro stations for weapons. Judicial Notice Requested.

Respectfully submitted

GREGORY T. ANGELO

TYLER YZAGUIRRE

ROBERT M. MILLER

CAMERON M. ERICKSON

By: /s/ George L. Lyon, Jr.
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Attorneys for Plaintiffs

Dated: July 22, 2022

CERTIFICATE OF SERVICE

I, George L. Lyon, Jr., a member of the bar of this court, certify that I served the foregoing document on all counsel of record for Defendants through the court's ECF system, this 22nd day of July, 2022.

/s/ George L. Lyon, Jr., DC Bar 388678