

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

DELAWARE STATE SPORTSMEN'S	:	
ASSOCIATION, INC; BRIDGEVILLE	:	
RIFLE & PISTOL CLUB, LTD.;	:	
DELAWARE RIFLE AND PISTOL CLUB;	:	Civil Action No.:
DELAWARE ASSOCIATION OF	:	1:22-cv-00951-RGA
FEDERAL FIREARMS LICENSEES;	:	
MADONNA M. NEDZA; CECIL CURTIS	:	
CLEMENTS; JAMES E. HOSFELT, JR;	:	
BRUCE C. SMITH; VICKIE LYNN	:	
PRICKETT; and FRANK M. NEDZA,	:	

Plaintiffs.

v.

DELAWARE DEPARTMENT OF	:	
SAFETY AND HOMELAND SECURITY;	:	
NATHANIAL MCQUEEN JR. in his	:	
official capacity as Cabinet Secretary,	:	
Delaware Department of Safety and	:	
Homeland Security; and COL. MELISSA	:	
ZEBLEY in her official capacity as	:	
superintendent of the Delaware State Police,	:	

Defendants.

**DECLARATION OF CECIL CURTIS CLEMENTS IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY INJUNCTION**

1. I, Cecil Curtis Clements, am a Plaintiff in the above-titled action. I am over the age of 18, have personal knowledge of the facts and events referred to in this Declaration, and am fully competent to testify as to the matters stated below.

2. I submit this Declaration, in support of Plaintiffs' motion for preliminary injunction and accompanying Brief in support.

3. I am a citizen of the State of Delaware, residing in New Castle County, Delaware.

4. I am a member of the Delaware State Sportsmen's Association, Inc. ("DSSA") and am an NRA certified firearms instructor.

5. I am not a licensed firearms manufacturer, importer or dealer.

6. I do hold a concealed carry permit for the State of Delaware.

7. I am aware that on June 30, 2022, John Carney, Governor of Delaware, signed into law House Bill 450 ("HB 450") and Senate Substitute 1 for Senate Bill 6 ("SS 1 for SB 6").

8. I am also aware that HB 450 bans the (1) transport into Delaware; and the (2) manufacture, sale, offer for sale, transfer, purchase, receipt, or possession of firearms in common use labeled "assault weapons." 11 *Del. C.* § 1466(a)(1)-(2).

9. I am also aware that SS 1 for SB 6 bans the manufacture, sale, offer for sale, purchase, receipt, transfer, or possession of ammunition magazines in common use labeled "large-capacity magazines." 11 *Del. C.* § 1469.

10. I personally own firearms in common use labeled "assault weapons" under HB 450.

11. I also desire and intend to acquire additional firearms in common use labeled "assault weapons" under HB 450 for self-defense and other lawful purposes—for example, a Daniel Defense DDM V7 Pro competition AR-15, a Rock Island Armory VR82 tactical shotgun for self-defense, and a number of different semi-auto pistols suitable for competition, firearms instruction and range shooting, such as the Sig Sauer P320 Spectre Comp, which are banned because they have threaded barrels needed for installation of the compensators with which the pistols come equipped. But for the ban of firearms in common use labeled "assault weapons" under HB 450, and my reasonable fear of criminal prosecution, I would acquire additional firearms labeled "assault weapons" under HB 450.

12. I also personally own ammunition magazines in common use labeled “large-capacity magazines” under SS 1 for SB 6.

13. I desire and intend to acquire additional ammunition magazines in common use labeled “large-capacity magazines” under SS 1 for SB 6 for self-defense and other lawful purposes—for example, magazines for Sig Sauer P320 pistols, HK VP9 Match pistols, Springfield Prodigy pistols, et al; however, due to the ban, the manufacturers and distributors will not ship them to Delaware, preventing me from acquiring same. But for the ban of “large-capacity magazines” in common use under SS1 for SB 6, I would acquire additional ammunition magazines labeled “large-capacity magazines” under SS1 for SB 6.

14. In summary, HB 450 and SS 1 for SB 6 violate my constitutional rights. HB 450 and SS 1 for SB 6 also inflict irreparable harm on me that cannot be remedied absent injunctive relief.

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


Cecil Curtis Clements

Dated: December 9, 2022.