

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

DELAWARE STATE SPORTSMEN’S
ASSOCIATION, INC.; BRIDGEVILLE
RIFLE & PISTOL CLUB, LTD.;
DELAWARE ASSOCIATION OF
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;
NATHANIEL 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.

C.A. No. 1:22-cv-0951-RGA

GABRIEL GRAY; WILLIAM TAYLOR;
DJJAMS LLC; FIREARMS POLICY
COALITION, INC., and SECOND
AMENDMENT FOUNDATION,

Plaintiffs,

v.

KATHY JENNINGS, Attorney General of
Delaware,

Defendant.

**DECLARATION OF MATTHEW JENKINS, SOLELY IN HIS CAPACITY AS
PRINCIPAL OF DJJAMS LLC, IN SUPPORT OF PLAINTIFFS’ MOTION
FOR A PRELIMINARY AND PERMANENT INJUNCTION**

1. I, Matthew Jenkins, am the principal of DJJAMS LLC (“DJJAMS”), a Plaintiff in the above-captioned 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, together with the previously submitted Opening Brief in Support of Plaintiffs’ Motion for a Preliminary and Permanent Injunctive Relief.

3. I am a citizen of the State of Delaware residing in New Castle County, Delaware, and DJAMMS is a limited liability company organized and existing under the laws of the State of Delaware.

4. I am a member of the Plaintiff Firearms Policy Coalition, Inc. and of Plaintiff Second Amendment Foundation.

5. I hold a concealed carry permit in the State of Delaware.

6. I am federally licensed firearms dealer through my business entity, DJJAMS.

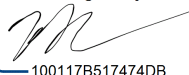
7. I am aware that on June 30, 2022, Governor Carney signed into law House Bill 450 (“HB 450”). I am further aware that HB 450 bans possession, receipt, purchase, sale, transportation, and self-manufacture of so-called “assault weapons” (the “Ban”)

8. As a consequence of the Ban, DJJAMS has had to turn away customers who wished to purchase or effect lawful transfers of firearms which are subject to the Ban, resulting in lost business opportunities. But for the Ban and my reasonable fear of serious criminal prosecution for a violation of it, I would sell and assist customers in effecting lawful transfers of such firearms. Additionally, I reasonably fear prosecution for inadvertent violations of the Ban in connection with sales or transfers of what the State may subsequently deem a “copycat” of a firearm on the long list of banned “assault weapons.”

9. Delaware's Ban violates my constitutional rights and inflicts irreparable harm on me that cannot be remedied absent the issuance of injunctive relief.

I declare under penalty of perjury that the foregoing is true and correct. Executed within the United States.

Dated: 12/23/2022

DocuSigned by:

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Matthew Jenkins, solely in his capacity as principal
of DJJAMS LLC