

**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 WILLIAM TAYLOR IN SUPPORT OF PLAINTIFFS’ MOTION
FOR A PRELIMINARY AND PERMANENT INJUNCTION**

1. I, William Taylor, am 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 Sussex County, Delaware.

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

5. I am in the process of obtaining my concealed carry permit in Delaware and Maryland.

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

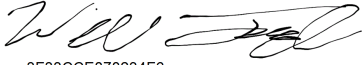
7. I am aware that on June 30, 2022, Governor Carney signed into law House Bill 450 ("HB 450"). I am further aware that HB 450 bans possession, receipt, purchase, sale, transportation, and self-manufacture of so-called "assault weapons" (the "Ban")

8. I do not currently own but desire to own firearms that Delaware has banned as "assault weapons," specifically an AK design rifle, a commonly-owned type of rifle, for self-defense, hunting, and other lawful purposes. But for the Ban and my reasonable fear of serious criminal prosecution for a violation of it, I would purchase and lawfully use such a firearm.

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: 12/22/2022

DocuSigned by:

3F33CCE878234F6...

William Taylor