

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

ETHAN MCROREY, KAYLEE FLORES,)
GUN OWNERS OF AMERICA, INC., and)
GUN OWNERS FOUNDATION,)

Plaintiffs,)

v.)

Civil Action No. _____

MERRICK B. GARLAND, in his Official)
Capacity as Attorney General of the)
United States, and the FEDERAL)
BUREAU OF INVESTIGATION)

Defendants.)
_____)

DECLARATION OF MEGAN BROWNING

1. My name is Megan Browning. I am the Director of Administrative Services for Plaintiff Gun Owners of America, Inc., and the Director of Administrative Services for Gun Owners Foundation.

2. Gun Owners of America, Inc. ("GOA") is a California non-stock corporation with its principal place of business at 8001 Forbes Place, Springfield, VA 22151. GOA is organized and operated as a non-profit membership organization that is exempt from federal income taxes under Section 501(c)(4) of the U.S. Internal Revenue Code. GOA was formed in 1976 to preserve and defend the Second Amendment rights of gun owners. GOA has more than two million members

and supporters across the country, including residents of the Northern District of Texas who are between 18 and 21 years of age.

3. Gun Owners Foundation (“GOF”) is a Virginia non-stock corporation, with its principal place of business at 8001 Forbes Place, Springfield, VA 22151. GOF is organized and operated as a non-profit legal defense and educational foundation that is exempt from federal income taxes under Section 501(c)(3) of the U.S. Internal Revenue Code. GOF is supported by gun owners across the country and within this district.

4. My role for GOA and GOF is to work with members and supporters, providing membership support and donor services.

5. During the regular course of business in my employment with GOA and GOF, I am in routine contact with individual gun owners and others within the firearms community. I routinely communicate with many of GOA’s and GOF’s members and supporters from all across the United States.

6. GOA’s and GOF’s members and supporters represent a diverse group of individuals and entities, including many young adults who are between the ages of 18 and 21. GOA and GOF have many thousands of such young adult members and supporters nationwide, many of whom have purchased, are in the process of purchasing, or desire to, intend to, or will attempt to purchase firearms before reaching the age of 21, and thus will be subjected to an “enhanced background check” under the challenged statute.

7. Prior to the filing of this case, GOA and GOF have heard from numerous of their members and supporters, including young adults, about how these persons are being and will continue to be irreparably harmed by the challenged statute.

8. It is my understanding that there are at least 42 states across the country where young adults 18-to-20 years old may lawfully purchase long guns (rifles and shotguns) from federally licensed firearm dealers.¹ Thus, the challenged statute will affect and irreparably harm countless young adults in these states, including thousands of members and supporters of GOA and GOF.

9. For nearly all of these 42 states (namely, Alabama, Alaska, Arizona, Arkansas, Connecticut, Georgia, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nevada, New Jersey, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, West Virginia, Wisconsin, and Wyoming), GOA and GOF have *specifically* identified and communicated with at least one person who is within the affected age (18-to-20 years old), who desires, wishes or intends to purchase a firearm before reaching the age of 21, and thus who is being or imminently will be irreparably harmed by the challenged statute. Each of these persons supports this effort to challenge this unconstitutional law.

10. As just one example, one of GOA's members in Indiana, Mr. Hayden Haines (18 years old), recently waited *18 days* before finally being *granted permission* by the FBI to exercise his enumerated right to acquire a firearm. Mr. Haines intends to purchase additional firearms from licensed dealers in the future, and his Second Amendment rights will be violated each and every time he attempts to do so.

¹ It would appear that only California, Colorado, Delaware, Florida, Hawaii, Illinois, Rhode Island and Vermont entirely prohibit firearm purchases/possession (including the long guns at issue here) for young adults under 21.

11. Protection of the rights and interests advanced in the Complaint is germane to GOA/GOF's mission, which is to preserve and protect the Second Amendment and the rights of Americans to keep and bear arms. GOA and GOF routinely litigate cases throughout the country on behalf of their members and supporters.

12. I have personal knowledge of myself, my activities, and my dealings with GOA's and GOF's members and supporters, as set out in the foregoing Complaint for Declaratory and Injunctive Relief. If called on to testify, I would competently testify as to the matters stated herein.

I, Megan Browning, certify under penalty of perjury that the foregoing is true and correct.

5/12/2023
Date


Megan Browning