

**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. )  
\_\_\_\_\_ )

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**DECLARATION OF HAYDEN HAINES**

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1. My name is Hayden Haines. I am a U.S. citizen and resident of Greenfield, Indiana. I am currently eighteen (18) years old.

2. I make this declaration in support of Plaintiffs' Complaint for Declaratory and Injunctive Relief. Unless otherwise stated, I make this declaration based on personal knowledge. If called as a witness, I can testify to the truth of the statements contained therein.

3. I am a member of Gun Owners of America, Inc. My story is just one example of the effects that the law being challenged on this case is having on young adults between the ages of 18 and 21.

4. I am a law-abiding person, eligible under both state and federal law to possess firearms. I have never been arrested or charged with any crime. There is no disqualification that would prohibit me from possessing or purchasing a rifle or shotgun.

5. As is particularly relevant here, I have no mental health condition or disability that would prohibit me from possessing firearms, or might otherwise implicate my ability to handle firearms safely and responsibly.

6. On April 23, 2023, I attempted to purchase a rifle from the Rural King in Shelbyville, Indiana, which holds a federal firearm license.

7. After paying for the firearm and, after filling out the ATF Form 4473, the store staff submitted my information to the FBI NICS system for the required background check.

8. However, as a result of a new federal statute, my attempted purchase was immediately placed into a delay status, which I was told is due simply to my age. I was instructed by the store that I would be called when my background check was approved. Because of this new law, I was unable to complete the purchase of my firearm, and I left the store emptyhanded.

9. Thirteen days later on May 6, 2023, I called Rural King to check on the status of my background check. I was told that my background check was still delayed, and that many such recent transactions, when attempted by adults under 21, are taking at least 30 days to be approved, and that one had taken 35 days.

10. I was informed that Rural King has a policy not to complete the transfer of any firearm until a background check is approved. Because there is no duty under existing law for a gun dealer to transfer me a firearm, and no duty under the new law for Indiana authorities to respond to FBI's background check requests for records so that I can obtain a firearm, there is inherent uncertainty as to when I will be allowed to acquire any given firearm (or whether I will be allowed to acquire one at all).

11. On May 10, 2023, Rural King called to tell me that my background check had finally been approved, after 18 days (including the day I attempted my purchase but was delayed).

12. What is more, I am aware that, for each and every future firearm I attempt to purchase, until I turn 21, I will be subject to this same mandatory delay for no other reason than my age.

13. In addition to this delay (waiting period) violating my Second Amendment rights, each time I purchase a firearm, I will be required to make a second trip to the store (Rural King is a half hour's drive each way from my home), costing me not only time but also fuel for my vehicle.

14. I fully intend to purchase additional firearms in the future, including before I turn 21, and I do not believe I should be mandated to wait any longer than any other adult to exercise my Second Amendment rights, simply because of my age.

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

Dated: May 10, 2023

  
HAYDEN HAINES