

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

BONITA SHREVE;)
GUN OWNERS OF AMERICA, INC.; and)
GUN OWNERS FOUNDATION,)

Plaintiffs,)

v.)

Civil No.: _____

UNITED STATES POSTAL SERVICE;)
DOUG TULINO, in his Official Capacity as)
U.S. POSTMASTER GENERAL;)
U.S. POSTAL INSPECTION SERVICE;)
GARY BARKSDALE, in his Official)
Capacity as CHIEF POSTAL INSPECTOR; and)
U.S. DEPARTMENT OF JUSTICE,)

Defendants.)

DECLARATION OF BONITA SHREVE

1. My name is Bonita Shreve. 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 herein.

2. I am an adult resident of Altoona, Pennsylvania, within Blair County. I am a citizen of the United States of America, the President of the Blair County 2d Amendment Coalition, and a member of Gun Owners of America, Inc.

3. I am a gun owner, eligible under state and federal law to purchase and possess firearms.

4. One of the firearms I own is a Bersa Thunder in .380 ACP, a clone of the ubiquitous Walther PPK handgun. In fact, I originally had intended to purchase a Walther PPK, but the gun store did

not have one in stock, and so I purchased the Bersa Thunder instead. Nevertheless, I still desire to obtain a Walther PPK, a purchase I intend to make within the next 90 days.

5. Since, after I make my intended purchase, I no longer will need my Bersa Thunder handgun, I wish to give it as a gift to my father, who lives in Palmyra, Pennsylvania. My father is a law-abiding person, eligible to acquire and possess firearms under both state and federal law.

6. However, my father lives approximately three hours away. This is a significant trip, and I currently have no plans to visit my parents. When I do, it requires more than \$70 in tolls on the Pennsylvania Turnpike, nearly \$50 of gas, wear and tear on the truck, and a hotel room in Palmyra, since my parents do not have room for us to stay.

7. Alternatively, I could simply visit the local post office, approximately three minutes from my home, and pay a minimal cost to ship the handgun – about \$20 in a flat rate box.

8. Since common carriers such as UPS and FedEx do not allow ordinary persons like me to ship firearms, USPS is the only realistic option. However, federal law and postal regulations currently prohibit shipment of handguns by ordinary persons who do not hold federal firearms licenses. In other words, there is no realistic option for me to ship my handguns as a gift to my father.

9. The only other option would be for me to visit a local firearms dealer, pay that dealer to take my handgun into its books, at a cost I estimate to be between \$30 and \$50, and then to ship my handgun to another firearm dealer in my father's area, at which point he would have to pay that dealer to transfer the firearm to him, at a cost of another \$30 to \$50. Again, this is far more expensive than simply shipping my handgun to my father through the mail, and it also takes significant time (I'd estimate at least an hour for each of us) on the part of both me and my father.

10. Were it not for federal law and postal regulations, and were I able to give my father a gift of this handgun, I would do so within a few days of purchasing the handgun I really want.

I, Bonita Shreve, certify under penalty of perjury that the foregoing is true and correct.

7/13/2025

DATE



Bonita Shreve