

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

LEONARD WILSON JR.,
GUN OWNERS OF AMERICA, INC.,
GUN OWNERS FOUNDATION, and the
STATE OF MISSOURI,

Plaintiffs,

v.

JACKSON COUNTY, MISSOURI,
SHERIFF DARRYL FORTE, in his Official
Capacity as the Sheriff of Jackson County,
Missouri, and MELESA JOHNSON, in her
Official Capacity as the Prosecutor of Jackson
County, Missouri,

Defendants.

Civil No.: _____

DECLARATION OF ERICH M. PRATT

1. My name is Erich M. Pratt. I am a U.S. citizen and resident of Virginia. 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 the Senior Vice President of Gun Owners of America, Inc. ("GOA"), and the Senior Vice President of Gun Owners Foundation ("GOF").

3. In that capacity, I oversee staff that is in daily contact with members and supporters regarding their concerns, questions, requests, and suggestions on how GOA and GOF can best represent their interests.

4. Gun Owners of America, Inc. is a California non-stock corporation with its principal place of business in Springfield, Virginia. GOA is organized and operated as a nonprofit 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 2 million members and supporters across the country, including residents of this district, some of whom are and will be irreparably harmed by Jackson County's Ordinance at issue here.

5. Gun Owners Foundation is a Virginia non-stock corporation with its principal place of business in Springfield, Virginia. GOF is organized and operated as a nonprofit 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, including residents of this district, some of whom are and will be irreparably harmed by Jackson County's Ordinance at issue here.

6. GOF funds its litigation efforts, in part, by way of individual contributions, along with contributions received from individuals through the Combined Federal Campaign. GOF's supporters provide the funds directly used to support GOF's litigation efforts, which efforts would be impossible without contributions from our supporters. Our supporters contribute to GOF specifically so that we can bring litigation like this.

7. As part of keeping its supporters up to date on this and other litigation, and various other Second Amendment topics, GOF provides its supporters with a newsletter which provides updates directly to them, keeping them advised of what GOF is doing.¹ GOF's supporters desire that GOF be involved in this case as it directly impacts protected Second Amendment conduct.

8. Moreover, GOF members have a significant organizational attachment to GOF, demonstrated by their voluntary decision to fund GOF, their receipt of information about GOF

¹ See <https://tinyurl.com/mr465htx>.

activities through a quarterly GOF newsletter and regular emails about its activities, and their communication of their views to GOF about issues on which GOF should focus. The reason that GOF exists is to advocate and defend the Second Amendment rights of gun owners, and many such persons fund GOF's activities. *See Texas v. BATFE*, 737 F. Supp. 3d 426, 438 (N.D. Tex. 2024) ("The foregoing, together, suffice for GOF's associational standing.").

9. Jackson County, Missouri Ordinance No. 5865 restricts the Second Amendment rights of adults between the ages of 18 and 21, prohibiting them from acquiring handguns or from possessing "semiautomatic assault rifles."

10. At least one of GOA's members, named as a Plaintiff in this case, is directly impacted by this Ordinance.

11. Traditionally, law-abiding Americans could purchase and possess firearms and ammunition between the ages of 18 and 21. However, the Ordinance now restricts that otherwise lawful and constitutionally protected activity, and also restricts our members and supporters who are over 21 years of age from selling or transferring certain firearms to those under 21.

12. Our members and supporters desire and overwhelmingly support GOA and GOF's involvement in litigation such as this to protect their right to acquire firearms unimpeded by government, rights that are being unconstitutionally infringed by the Ordinance.

13. Individuals can visit <https://www.gunowners.org/> to read about our mission and be kept informed on a vast number of topics, including a congressional "scorecard" of how their congressmen vote, and we have created state-specific legislative alerts that we send out to keep our members and supporters informed. We also keep our members and supporters up to date on our litigation across the United States. *See* <https://www.gunowners.org/press-center/>. Interested individuals can join GOA by going to <https://donate.gunowners.org/join/>.

14. Further, we routinely hear from our members and supporters on various topics, including such topics as the Ordinance, which allows us to direct our resources (including litigation) where it is needed most. By way of example only, members in New York reached out to us after the Supreme Court issued its opinion in *N.Y. State Rifle & Pistol Ass'n v. Bruen*, 597 U.S. 1 (2022), which triggered a response from the Governor and legislature of New York, culminating in the inaptly named “Concealed Carry Improvement Act,” which made the carry of firearms illegal almost everywhere across New York. GOA and GOF immediately filed suit, leading to the reinstatement of the Second Amendment across wide swaths of previously off-limits places to carry. *See Antonyuk v. Hochul*, 639 F. Supp. 3d 232 (N.D.N.Y. 2022) (granting and denying preliminary injunctive relief); *Antonyuk v. James*, 120 F.4th 941 (2d Cir. 2024) (affirming in part, and reversing in part, preliminary injunction); *see also Texas*, 737 F. Supp. 3d at 438-39 (finding Plaintiffs GOA and GOF have standing to bring suit on behalf of their members and supporters against a federal rule restricting gun sales).

15. GOA and GOF together have more than 2 million members and supporters nationwide, including residents of the Western District of Missouri, and including those between the ages of 18 and 21, including Leonard Wilson, named as a Plaintiff in this case.

16. Protection of the rights and interests advanced in this litigation is germane to GOA and GOF’s respective missions, which includes the effort to preserve and protect the Second Amendment and the rights of Americans to keep and bear arms, including against overreach by unelected and unaccountable anti-gun bureaucrats. GOA and GOF routinely litigate cases throughout the country on behalf of their members and supporters, and GOA and GOF are capable of fully and faithfully representing the interests of their members and supporters without participation by each of the individuals and entities.

I, Erich M. Pratt, declare under penalty of perjury that the foregoing is true and correct.

6/23/2025
DATE

Erich Pratt
ERICH M. PRATT