

**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 LEONARD WILSON JR.

1. My name is Leonard Wilson Jr. I am a U.S. citizen and resident of Tuscumbia, Missouri, in Miller County. 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 a law-abiding person, eligible to possess firearms under state and federal law. I am currently eighteen (18) years of age. I am an avid supporter of the right to keep and bear arms, and a member of Gun Owners of America.

3. Although I live in Miller County, Missouri, I often visit my uncle and his family, who live in Jackson County, Missouri. Due to the lengthy drive between our homes, I often stay overnight, and at times for multiple days, during my visits.

4. During my visits, my uncle and I routinely visit a nearby shooting range to engage in

target practice with firearms.

5. Although in the past I have used my uncle's firearms when we shoot at the range, now that I have recently turned 18, I wish to acquire my own firearms.

6. And after acquiring firearms of my own, I wish to bring those firearms with me when I visit my uncle's home, and take them with me when we go to shoot at the range.

7. In recent months, I have spoken with my uncle about selling me a handgun and handgun ammunition, a transaction which is legal under both state and federal law.

8. My uncle has agreed to sell me a Canik TP9 handgun, along with ammunition for the firearm, for \$300.

9. My uncle and I have agreed that we would engage in this transaction the next time I visit him and his family, which will occur within the next month or two. Since I live a considerable distance away in Miller County, my uncle's home in Jackson County is the only reasonable and convenient place for this transaction to occur.

10. However, because I am between the ages of 18 and 21, Jackson County Ordinance No. 5865 makes it illegal for me to purchase my uncle's handgun and ammunition, and makes it illegal for my uncle to sell those items to me.

11. Thus, my uncle and I cannot lawfully (and therefore will not) engage in our planned transaction due to the Ordinance, unless and until it is declared unlawful and struck down.

12. In addition to purchasing a handgun and handgun ammunition from my uncle, I also wish to purchase and acquire an AR-15-style rifle from a Federal Firearms Licensee. I plan to make such a purchase within the next three months. This is lawful under both state and federal law.

13. However, the Ordinance prohibits me from thereafter possessing such a "semiautomatic assault rifle" within Jackson County.

14. Although the Ordinance does not define what it means by “semiautomatic assault rifle,” my understanding is that AR-15-style rifles of the kind I wish to purchase have been given the pejorative label “assault rifle” in many other jurisdictions, and by the media and anti-gun activists. Thus, although I cannot say for certain due to the vague wording of the Ordinance, I believe the AR-15-style rifle I wish to purchase would fall within the Ordinance’s prohibition.

15. In addition to my planned purchase of an AR-15-style rifle, I also wish to acquire other semiautomatic rifles in the near future (within the next 12-18 months). Although I have not determined precisely which makes and models I wish to acquire, such firearm or firearms likely would have features such as detachable box magazines, folding or telescoping stocks, pistol grips, threaded barrels, and other features that are ubiquitous on most modern rifles, but which features are commonly associated with so-called “assault rifles” in other jurisdictions. But since the Ordinance bans “semiautomatic assault rifles” without further definition or description, I do not know the contours of the Ordinance’s prohibition, and therefore I am entirely unable to be certain whether I can purchase rifles in the future and then possess them within Jackson County.

16. After acquiring the above firearm(s), I wish to transport them through Jackson County, wish to possess them within Jackson County, and wish to shoot them (at the range) within Jackson County, during my visits to my uncle’s home.

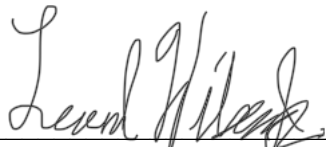
17. And although the Ordinance contains various exceptions which might apply to some of my activities (such as when at my uncle’s home, or engaged in target practice at the range), the Ordinance’s language does not exempt my transport of my firearms in my vehicle through Jackson County, does not exempt any other possession within Jackson County (such as when I stop for gas, use the bathroom, or get something to eat), and does not even allow me lawfully to bring my firearms with me when I travel from my uncle’s house to the range.

18. Due to the Ordinance, I am unable to lawfully engage in my planned acquisition, transport, possession, and use of firearms and ammunition within Jackson County.

19. But for the Ordinance, I would engage in the above activities, which are lawful under both state and federal law, but which are made unlawful by the Ordinance. Since I do not wish to be arrested and charged with violating the Ordinance, I have refrained and will continue to refrain from engaging in these activities, until the Ordinance is declared unlawful and struck down.

I, Leonard Wilson Jr., declare under penalty of perjury that the foregoing is true and correct.

DATE



LEONARD WILSON JR.