

**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.

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.

Civil No.: _____

DECLARATION OF VAL W. FINNELL

1. My name is Val W. Finnell. I am a U.S. citizen and resident of Pennsylvania. 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 Pennsylvania State Director of Gun Owners of America, Inc. ("GOA").

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

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, many of whom will be irreparably harmed by the federal statute and implementing regulations prohibiting the mailing of handguns through the United States Postal Service.

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 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, including Pennsylvania residents, many of whom are and will be irreparably harmed the federal statute and implementing regulations prohibiting the mailing of handguns through the United States Postal Service. Donations by supporters of GOF fund the organization's activities, including litigation such as this to defend their right to keep and bear arms.

6. GOA and GOF members and supporters desire and overwhelmingly support our involvement in litigation to protect their right to acquire, transfer, ship, and transport firearms easily and unimpeded by government, a right that is being unconstitutionally infringed by the forbidding of mailing handguns.

7. For years, our members and supporters, most of whom do not hold Federal Firearm Licenses, have been unable to ship handguns to either themselves or to anyone else. At one time, UPS and FedEx allowed shipments of handguns from non-licensees, but both of those companies have stopped permitting such shipments in recent years. And the United States Postal Service has not allowed mailing of handguns since 1927.

8. But traditionally, law-abiding Americans have been able to manufacture, acquire, and possess – and ship – firearms largely without government oversight, and certainly without permission, registration, or taxation.

9. Prior to 1927, there was no federal restriction on mailing handguns, even across state lines.

10. As noted, GOA and GOF together have more than two million members and supporters nationwide, including many within this district.

11. But for the federal law and regulations prohibiting it, resulting in hefty criminal penalties, including fines, imprisonment, and loss of Second Amendment rights if one is convicted, our members and supporters would utilize the United States Postal Service to mail handguns to others intrastate and to themselves interstate.

12. Indeed, the inability to use the United States Postal Service to mail handguns does not make any logical sense. First, licensed dealers – but not ordinary Americans – are allowed to utilize the mails to ship handguns, meaning USPS already handles the shipment of handguns. Second, our members and supporters are allowed to mail long guns (rifles and shotguns) but just not handguns. But whether they are handguns, rifles, or shotguns, all of these are still “arms” that are protected by the Second Amendment.

13. GOA has been in contact with members and supporters who wish to avail themselves of the United States Postal Service to ship handguns to themselves and to others, in accordance with the law.

14. One of our members lives in Pennsylvania and owns a firearm training academy. This member explained that they sometimes have traveled by vehicle outside of the state of Pennsylvania to attend various firearms training courses. This member further explained that they would have flown to their destination, saving hours and hours of travel time, instead of driving if

they were allowed to mail their handguns to themselves, but refrained from flying because they did not wish to “check” their handgun with the Transportation Security Administration (“TSA”) due to concerns about theft of their handgun while in the airline’s possession. This member stated that they would fly to their destination instead of driving if they were allowed to ship handguns to themselves out of state.

15. 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. 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.

I, Val W. Finnell, declare under penalty of perjury that the foregoing is true and correct.

July 14, 2025
DATE


VAL W. FINNELL