

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

SEAN DALE HENRY, GUN OWNERS)
OF AMERICA, INC., and GUN OWNERS)
FOUNDATION)

Plaintiffs,)

v.)

HONORABLE MARIO BROOKS, in his)
Official Capacity as COMMISSIONER)
OF THE VIRGIN ISLANDS POLICE)
DEPARTMENT, and the GOVERNMENT)
OF THE VIRGIN ISLANDS)

Defendants.)
_____)

Civil Action No. _____

DECLARATION OF SEAN DALE HENRY

1. My name is Sean Dale Henry. I am a U.S. citizen and resident of Gilchrist County, Florida. 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 over the age of 21, an avid supporter of the right to keep and bear arms, a member of Gun Owners of America, and a financial supporter of Gun Owners Foundation.

3. I currently possess a valid Florida Concealed Weapons License and am able to lawfully bear arms in public while in Florida and across most of the country either through other states' reciprocity with my Florida permit, or through other states' "constitutional carry."

4. I also maintain a Federal Firearm License ("FFL") issued by the federal government.

5. I meet all the requirements for issuance of a license to carry a concealed handgun in the United States Virgin Islands, except that I do not reside in the United States Virgin Islands or maintain a place of business there that would allow me to apply for a license. In other words, I am ready and able to apply for a license to carry a concealed handgun in the United States Virgin Islands, but am not able to do so.

6. If I resided in the United States Virgin Islands, or maintained a place of business there, I would be able to apply and would be issued a permit.

7. Alternatively, if the United States Virgin Islands recognized my Florida permit and granted reciprocity with Florida, I would be able to carry my handgun while in the United States Virgin Islands. But the United States Virgin Islands grants no such reciprocity to the permits of other states.

8. Even though I am unable to apply for a permit to possess and carry a firearm while in the United States Virgin Islands, I have taken steps to apply. Specifically, I attempted to contact the United States Virgin Islands Police Department, multiple times, and at multiple numbers posted on the Department's website. However, I have been unable to get in contact with anyone at the Department. In other words, the police are not answering the telephone, which is never a good sign.

9. On October 13, 2025, I contacted the United States Virgin Islands Police Department, Office of the Police Commissioner at (340) 715-5506. However, there was no answer and no way for me to leave a message.

10. I thought that maybe the office was closed due to Columbus Day, so I tried again the next day. On October 14, 2025, I called the same number again, and there was again no answer and no way for me to leave a message.

11. I then made a third call to the main number on the Department's website: (340) 776-9110. That number returned a message that it was "not in service."

12. I then called another number: (340) 715-5221 which was on the Department's website. That number was also not in service.

13. I then contacted the United States Virgin Islands Office of the Police Chief at (340) 715-5548. That number returned a message that it was "unavailable."

14. I have tried multiple times to obtain an application to even apply for a permit to carry my firearm in the United States Virgin Islands, or to see if my Florida Concealed Weapons License to carry will be honored while I am visiting. However, I have been unable even to contact the appropriate authorities.

15. I plan to visit St. Thomas within the next 90 days and then after that, I would visit St. Thomas again within 120 days. And, but for the challenged statutes, I would bring, possess and carry my handgun concealed with me during my stays in St. Thomas. Specifically, but for the challenged laws, I would check my firearm with my checked luggage at my airport, in accordance with all state and federal laws, and declare my firearm and ammunition when I land at Cyril E. King Airport to the appropriate authorities and display my Florida Concealed Weapons License.

16. However, because I fear being prosecuted under the challenged laws, and because the United States Virgin Islands will not allow me to apply for a permit to carry while on the islands, and because my Florida Concealed Weapons License is not honored, I am forced to refrain from bringing my handgun with me for self-defense on my intended trip and my Second Amendment right to "keep and bear arms" is infringed.

I, Sean Dale Henry, declare under penalty of perjury that the foregoing is true and correct.

07 / 16 / 2026

DATE

A handwritten signature in black ink, appearing to read 'Sean Dale Henry', written over a horizontal line.

SEAN DALE HENRY