

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

ALEXANDER HAYWARD,  
GUN OWNERS OF AMERICA, INC., and  
GUN OWNERS FOUNDATION,

Plaintiffs,

v.

TODD BLANCHE, in his Official  
Capacity as Attorney General of the  
United States, LT. COL. GEORGE L. BIVENS,  
in his Official Capacity as Acting Commissioner  
of the Pennsylvania State Police, and the  
FEDERAL BUREAU OF INVESTIGATION,

Defendants.

Civil Action No. \_\_\_\_\_

**DECLARATION OF ALEXANDER HAYWARD**

1. My name is Alexander Hayward. I am a U.S. citizen and resident of Allegheny County, 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 20 years old, a college student, and a law-abiding person who is eligible to purchase and possess firearms under Pennsylvania and federal law. I have no firearm-prohibiting mental, juvenile, or criminal record.

3. I am a gun owner, a supporter of the right to keep and bear arms, a member of Plaintiff Gun Owners of America, Inc., and a financial supporter of Plaintiff Gun Owners Foundation.

4. On July 21, 2026, I visited Verona Gun Safe, a federally licensed firearms dealer located within this district at 716 Allegheny River Boulevard, Verona, PA 15147.

5. While there, I attempted to pick up an AK-style rifle I had purchased from Palmetto State Armory, an online retailer. I had selected Verona Gun Safe as my local dealer to facilitate the transfer of this rifle.

6. However, after completing an ATF Form 4473 for this firearm and submitting to a background check as required by law, my background check was immediately delayed by virtue of my age.

7. Indeed, because I am under 21 years of age, federal law requires that I be subjected to an “enhanced” background check under 18 U.S.C. § 922(t)(1)(C) and 34 U.S.C. § 40901(*l*) (the “Challenged Provisions”), which require that local authorities be contacted to verify whether or not I have any disqualifying juvenile and mental-health records.

8. Based on these additional, time-consuming requirements, I was forced to leave Verona Gun Safe emptyhanded that day, awaiting further contact to pick up my rifle once my background check cleared.

9. The next day, on July 22, 2026, I was informed that my delayed background check finally had been approved, and I picked up my firearm from Verona Gun Safe that day.

10. That was not the only time I have been delayed at least a day in receiving a firearm. I also experienced a similar background check-related delay purchasing a different firearm when I was 19 years old.

11. I wish to be able to purchase firearms without being subjected to these unpredictable, indeterminate, and unconstitutional delays in the exercise of an enumerated right.

12. In the next 90 days, I plan to purchase another firearm from a licensed dealer within this district, and when I do, I once again will be subjected to the Challenged Provisions by virtue of my age. I also plan to continue acquiring firearms thereafter, until I turn 21 years of age and thereafter.

I, Alexander Hayward, declare under penalty of perjury that the foregoing is true and correct.

10/9/2026

**Date**

A handwritten signature in black ink, appearing to read "Alex Hayward", written over a horizontal line.

**Alexander Hayward**