

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF LANCASTER

**JOHN CRUMP,
GUN OWNERS OF AMERICA, INC.,
GUN OWNERS FOUNDATION,
VIRGINIA CITIZENS DEFENSE LEAGUE, and
VIRGINIA CITIZENS DEFENSE FOUNDATION,**

Plaintiffs,

v.

Case No. _____

**COLONEL JEFFREY S. KATZ,
In His Official Capacity as
Superintendent of the Virginia State Police
7700 Midlothian Turnpike
North Chesterfield, VA 23235,**

Defendant.

AFFIDAVIT OF ERICH PRATT

This day personally appeared before me, a Notary Public in and for the Commonwealth and County aforesaid, the undersigned, after proof of identification, Erich Pratt, who being first duly sworn, gave oath to the best of the affiant's belief, knowledge, and intentions as follows:

1. I, Erich Pratt, am a United States citizen and resident of Virginia.
2. I make this affidavit in support of Plaintiffs' Complaint for Declaratory and Injunctive Relief. I have personal knowledge of the facts stated herein, and if called as a witness, I could competently testify thereto.
3. I am the Senior Vice President of Gun Owners of America, Inc. ("GOA") and the Senior Vice President of Gun Owners Foundation ("GOF"), and I am authorized to testify on behalf of GOA and GOF for matters set forth in this affidavit.

4. GOA is a California non-stock corporation with its principal place of business in Springfield, Virginia.
5. 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.
6. GOA was formed in 1976 to preserve and defend the Second Amendment rights of gun owners. GOA's members and supporters include residents of and visitors to Lancaster County, Virginia.
7. GOF is a Virginia non-stock corporation with its principal place of business in Springfield, Virginia.
8. 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.
9. GOF was formed in 1983 and is supported by gun owners across the country, including Virginia residents. Donations by supporters of GOF fund the organization's activities, including litigation such as this to defend their right to keep and bear arms.
10. 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 GOF's supporters. GOF's supporters contribute to GOF specifically so that it can bring litigation like this. 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. In addition to another of GOF's board members, I am a financial supporter of GOF, as I personally have contributed funds to GOF to further its mission.

11. GOA and GOF together have more than two million members and supporters nationwide, including tens of thousands who are Virginia residents, some of whom reside in or visit this jurisdiction.
12. In my leadership capacity, I am in regular contact with GOA and GOF members and supporters regarding their concerns, questions, requests, and suggestions on how GOA and GOF can best represent their interests.
13. Ever since Va. Code §§ 18.2-287.4:1, 18.2-308.09(1), 18.2-308.1:9, 18.2-308.2:1, 18.2-308.2:2(A), 18.2-308.2:3, 18.2-308.2:2(F)(4)(1)-(7), 18.2-308.2:5(E), 18.2-287.4, 18.2-309.1, and 19.2-386.28 (the "Challenged Statutes") were enacted or otherwise amended via SB749 and SB727, a material concern of a significant number of GOA and GOF's members and supporters has been that the Challenged Statutes prohibit the importation, sale, manufacture, purchase, barter, transfer, and public carry of pejoratively named "assault firearms" and "large capacity ammunition feeding devices" after July 1, 2026.
14. These GOA and GOF members and supporters currently own and carry firearms and magazines that now will be restricted under the Challenged Statutes.
15. Likewise, these GOA and GOF members and supporters overwhelmingly wish to continue to be able to import, sell, manufacture, purchase, acquire, transfer, and

publicly carry “assault firearms” and “large capacity ammunition feeding devices” following the Challenged Statutes’ effective date, and they would do so but for Defendant’s threat of criminal enforcement against them.

16. Indeed, being ordinary citizens, the vast majority of these GOA and GOF members and supporters do not qualify under any of the exceptions to the Challenged Statutes’ general prohibitions on “assault firearms” and “large capacity ammunition feeding devices.”
17. For example, GOA member, GOF supporter, and Virginia resident John Crump wishes to engage in conduct now proscribed by the Challenged Statutes. Mr. Crump wishes to purchase a number of semi-automatic center-fire rifles, pistols, and shotguns, as well as standard-capacity magazines for these firearms with capacities in excess of the 15-round legal limit, following the Challenged Statutes’ effective date.
18. GOA and GOF have heard from other of their members and supporters who wish to engage in the same and similar activities as Mr. Crump, including the import, sale, manufacture, purchase, acquisition, transfer, and public carry of “assault firearms” and “large capacity ammunition feeding devices.”
19. Furthermore, GOA maintains a membership and partnership program for businesses called the Caliber Club, comprised of more than 5,000 gun stores and shooting ranges across the country, including many within Virginia, such as Chandler’s Firearms in Kilmarnock, Lancaster County, Virginia, within this Court’s jurisdiction.

20. GOA's Caliber Club industry members face an artificially restricted marketplace and resultant losses of customers and sales revenue under the Challenged Statutes' ban on "assault firearms" and "large capacity ammunition feeding devices." Indeed, these firearms and magazines presently account for a significant portion of these industry members' revenues. GOA's Caliber Club members join GOA to collectively support Second Amendment rights, including their rights and interests as firearms dealers, and in turn, GOA advocates for and at times litigates to protect the rights of its Caliber Club members.
21. GOA and GOF's members and supporters desire and overwhelmingly support GOA and GOF's involvement in litigation to protect their right to import, sell, manufacture, purchase, acquire, transfer, and publicly carry "assault firearms" and "large capacity ammunition feeding devices."
22. Protection of the rights and interests advanced in this litigation is germane to GOA and GOF's mission, which includes protecting Article I, Section 13 of the Virginia Constitution and the rights of Virginians and GOA and GOF members and supporters to keep and bear "assault firearms" and "large capacity ammunition feeding devices." GOA and GOF routinely litigate cases throughout the country on behalf of their members and supporters, and are capable of fully and faithfully representing the interests of their members and supporters without individual participation by each.
23. Separately, GOA also suffers direct, organizational harm under the Challenged Statutes. As an organization, GOA has conducted and wishes to continue to conduct fundraising raffles and drawings involving firearms, often including

firearms now labeled “assault firearms,” the proceeds of which fund the organization’s activities. Similarly, GOA conducts and hosts “range days” and training events where staff, members, supporters, and the public can view, experience, learn about, and use firearms and magazines prohibited by the Challenged Statutes. Moreover, GOA possesses its own firearm magazines, which its staff maintain at various locations, including at GOA’s headquarters in Virginia. GOA and its staff wish to continue to purchase, acquire, and transfer magazines that the Challenged Statutes prohibit. For each of these reasons, the Challenged Statutes harm GOA directly, causing GOA to suffer losses of membership revenue, along with the inability to conduct its activities and further its mission.

24. GOA, GOF, Mr. Crump, Chandler’s Firearms, and other members and supporters of GOA and GOF all wish to sell, manufacture, purchase, acquire, transfer, and publicly carry “assault firearms” and “large capacity ammunition feeding devices,” after July 1, 2026, free from criminal liability under the Challenged Statutes.
25. I certify under penalty of perjury that the foregoing is true and correct.

Erich Pratt

Erich Pratt

_____ (SEAL)

COMMONWEALTH OR STATE OF
CITY/COUNTY OF

Virginia

Fairfax, to wit:

I, *Daniel Patrick Kane*, a Notary Public in and for the State and County aforesaid, do hereby certify that *Erich Pratt*, whose name is signed to the foregoing Affidavit this *15th* day of *May*, 2026, has this day personally appeared and acknowledged the same before me after sufficient proof of identity.

Given under my hand this *15th* day of *May*, 2026.

Daniel Patrick Kane
Notary Public

My commission expires: *4/30/2029*

Registration #: *103895*

