

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.

DECLARATION OF ERIC J. CHANDLER

1. I, Eric J. Chandler, am a United States citizen and resident of Virginia.
2. I make this Declaration in connection with 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 an officer and proprietor of Chesterfield Armament & Art, Ltd., a Virginia company that is a federally licensed firearms dealer which operates a retail store in Kilmarnock, under the registered fictitious name of "Chandler's" (referred to hereinafter as "Chandler's Firearms").
4. Chandler's Firearms is located at 2 South Main Street in Kilmarnock, Virginia within Lancaster County, Virginia, and is open to the general public from 10:00 a.m. to 6:00 p.m., Tuesday through Saturday.
5. As of the date of this Declaration, Chandler's Firearms routinely receives, stocks, sells, makes available for purchase, and transfers to legally eligible members of the public, numerous firearms – including rifles, shotguns, and handguns - and ammunition feeding devices, the further transfer and sale of which will be prohibited as of July 1, 2026 pursuant to 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), 18.2-309.1, and 19.2-386.28 (the "Challenged Statutes") as recently amended by the General Assembly and effective July 1, 2026. For example, we routinely sell and transfer AR-15, AR-10, and AK-47 style rifles, Glock style handguns, shotguns with detachable

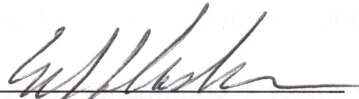
magazines, and numerous firearm magazines with a capacity greater than 15 rounds.

6. As a federally licensed firearms dealer, Chandler's Firearms also offers transfer services to the general public, whereby customers who are Virginia residents can purchase any type of firearm from sellers in any state or online, and have such firearms shipped to Chandler's Firearms to be transferred to the customer in the same manner as a direct sale from our inventory, in order to facilitate the customer's compliance with federal law governing such transfers from other states. For example, if a Virginia resident customer wishes to purchase a particular firearm that is not in stock at Chandler's Firearms, the customer can purchase the firearm from another source outside of Virginia by paying the seller directly, and then having it shipped directly to our store in Kilmarnock. For a small fee we will then transfer the firearm to the customer in compliance with all state and federal laws, including the customer providing identification, satisfactorily completing the required federal and state forms, and successfully undergoing the required background check submitted to the Virginia State Police.
7. This transfer service includes the transfer of all types of firearms, often with accompanying ammunition feeding devices with capacities exceeding 15 rounds. This transfer service includes the transfer of firearms the transfer of which to the general public will be prohibited under the Challenged Statutes as of July 1, 2026.
8. But for the Challenged Statutes and the Defendant's enforcement of them, Chandler's Firearms would continue to transfer and make available for sale to eligible members of the general public all of the otherwise lawful types of

firearms and ammunition feeding devices affected by the Challenged Statutes, including but not limited to making the same available for sale or transfer to the Plaintiffs in this case.

In accordance with Va. Code § 8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

4-22-2020
DATE


ERIC J. CHANDLER