

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF LYNCHBURG

**MELODY BOYER,
NATASHA ROUSSEAU,
GUN OWNERS OF AMERICA, INC.,
GUN OWNERS FOUNDATION,
VIRGINIA CITIZENS DEFENSE LEAGUE, and
VIRGINIA CITIZENS DEFENSE FOUNDATION,**

Plaintiffs,

v.

C a s e

N o .

**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 RYAN THOMAS

1. My name is Ryan Thomas. I am a U.S. citizen and resident of the City of Lynchburg, Virginia. 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 an adult over the age of 21.
3. I am a member of Gun Owners of America, Inc. and a member of Virginia Citizens Defense League.

4. I am a law-abiding citizen, and I have no legal disqualification that would prevent me from acquiring and possessing firearms under Virginia or federal law.
5. I own several semiautomatic AR-15-style rifles which I understand are pejoratively named “assault firearms” under Virginia law. I also own several handguns. I wish to lawfully sell some of the firearms from my personal collection that I no longer use to members of my local community in private, intrastate, noncommercial transactions, to take place within the City of Lynchburg.
6. Specifically, I wish to sell a Glock 19 handgun to Melody Boyer, a 19-year-old Virginia resident, via private transfer at my home in Lynchburg. We have agreed upon a price of \$650.
7. I also wish to sell to Melody Boyer a 6.5 Grendel-caliber semiautomatic AR-15-style rifle for the agreed-upon price of \$900, also via private transfer at my home in Lynchburg. This popular AR-15-style rifle qualifies as an “assault firearm” under Virginia law.
8. Further, I wish to sell a Smith & Wesson Shield handgun to Natasha Rousseau, an 18-year-old Virginia resident, via private transfer at my home in Lynchburg. We have agreed upon a price of \$300.
9. Finally, I also wish to sell to Natasha Rousseau a semiautomatic AR-15-style rifle for the agreed-upon price of \$900, also via private transfer at my home in Lynchburg. This popular AR-15-style rifle qualifies as an “assault firearm” under Virginia law.
10. However, I am prevented from completing these transactions by Va. Code §§ 18.2-308.7(C) and 18.2-308.2:5 (the “Challenged Statutes”). Despite being legal

adults, Section 18.2-308.7(C) prohibits Melody Boyer and Natasha Rousseau from purchasing handguns and “assault firearms” because they are “younger than 21 years of age.” Likewise, Section 18.2-308.2:5 doubly prohibits our desired transaction by criminalizing the private sale of firearms unless the prospective purchaser completes a government-administered background check.

11. But for the Challenged Statutes, I would immediately sell the above-described firearms to Melody Boyer and Natasha Rousseau in a private sale in the City of Lynchburg.

12. The Challenged Statutes infringe my right to keep and bear arms under Article I, Section 13 of the Virginia Constitution.

13. The Challenged Statutes therefore cause me irreparable harm by preventing me from transferring firearms I wish to transfer to willing and able buyers who are qualified adults and part of the body of people as contemplated by Article I, Section 13 of the Virginia Constitution.

14. Pursuant to Va. Code § 8.01-4.3, and in accordance Va. Code of § 8.01-628, I hereby affirm under penalty of perjury that (1) all of the foregoing declarations, (2) the allegations of the Complaint for Declaratory and Injunctive Relief, and (3) the facts stated in the Motion for Temporary Restraining Order and Preliminary Injunction to which this Declaration pertains, are true and accurate to the best of my knowledge.



Ryan Thomas

10/01/2026

Date



Christina L. Boyer

my commission expires Oct 31, 2026