

Hearing date: September 23, 2022
Hearing time: 9:00am
Judge/Calendar: Hon. Matthew Williams

IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

STATE OF WASHINGTON,

Plaintiff,

v.

FEDERAL WAY DISCOUNT GUNS, LLC,

Defendant.

CASE NO. 22-2-20064-2

**BAGHAI DECLARATION IN
SUPPORT OF OPPOSITION TO
MOTION FOR PRELIMINARY
INJUNCTION**

Defendant Mohammed Baghai declares as follows:

1. I am an adult citizen of the State of Washington, competent to testify and hereby testify of my personal knowledge.
2. I was honorably discharged from the United States Army in 1989 with the rank of Captain, I was an Army Ranger and carried out operations in Central and South American, along with in Israel and in the Middle East.
3. I am a member (owner) of Federal Way Discount Guns ("FWDG"), LLC.
4. My family fled Iran ahead of the Iranian Revolution.
5. During the Iran hostage crisis, I was the victim of hate crimes.
6. My home has been vandalized due to my ethnicity.
7. I was wrongfully arrested by a member of the Federal Way police department and brought

1 a lawsuit based upon racial discrimination, that case ultimately resulted in a settlement and
2 formal public apology, given against advice of his counsel, by the Chief, and the termination
3 of the officer who arrested me.

4 8. I have personal knowledge that the AGO has investigated and threatened, if not formally
5 filed against gun shops with Caucasian ownership, which were quickly resolved without
6 any publicity.

7 9. I believe that the AGO has targeted me to improperly leverage public distrust of individuals
8 with Muslim names; this is particularly evidenced by the fact that I do not use the name
9 Mohammad for any purpose (having been targeted for my ethnicity while in the Army) and
10 everyone knows me as Moe, but the AGO's press release materials have consistently
11 highlighted by ethnicity.

12
13 10. Despite my prior lawsuit against them, my business is a Community Partner with the
14 Federal Way Police Department ("FWPD").

15 11. FWPD trains regularly at my facility, including after the filing of this lawsuit.

16 12. FWPD is not the only policing organization that trains at Federal Way Discount Guns'
17 shooting range.

18 13. The Attorney General's Office attempted to convince the Federal Way Police Department
19 to criminally investigate me for the same allegations in this lawsuit; they refused.

20 14. FWDG has a history of not only serving the community by partnering with the Federal Way
21 Police Department, but also participating in investigations and putting ourselves in
22 significant physical risk by actively participating in undercover sting operations on behalf
23 of the ATF, a public service which also negatively impacts our business as many customers,
24 colleagues, and competitors do not approve of our cooperation with the authorities.
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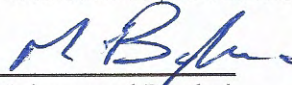
15. FDWG does not sell, and has never sold, so-called “Large Capacity Magazines” online.

16. “Large Capacity Magazines” is a misnomer if defined as more than ten rounds – most firearms today utilize magazines with more than ten rounds.

17. Magazines necessarily wear out over time and need to be replaced, a firearm without a properly operating magazine is useless.

18. FWDG sells many “Large Capacity Magazines” to law enforcement officers, which is what it intends to continue doing with its current inventory of the same.

EXECUTED under penalty of perjury this 19th day of December 2022 at Federal Way, WA.


Mohammed Baghai

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CERTIFICATE OF SERVICE

The undersigned declares under penalty of perjury that the following facts are true and correct:

I am a citizen of the United States, over the age of 18 years, and not a party to or interested in the above-entitled action.

On December 19, 2022, I served a copy of the foregoing upon all counsel of record via the Court's ECF system.

DATED this 19th day of December 2022 a Edmonds, WA

/s/ Nathan J. Arnold
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