

specifically as it relates to semi-automatic firearms with detachable magazines that are capable of holding over ten rounds. This report has been prepared in support of the Defendants Opposition to the State of Washington's Motion for Preliminary Injunction filed in this matter, *Washington v. Federal Way Discount Guns, LLC.*, King County Superior Court, Case No.: 22-2-20064-2. I have been retained to write a declaration at the rate of \$300/hour.

Background and Qualifications

3. I have spent the last twenty years as a firearms, ammunition, and defense industry executive. In addition to my role in the firearms industry, I have also been a professional shooter, competing in domestic and international matches in practical pistol and 3-gun for over 25 years.¹ I have a Bachelor of Science Degree in Entrepreneurship and Business Management from the W.P. Carey School of Business at Arizona State University. Through the Barrett Honors College, I wrote an Honor's Thesis for the basis of my first firearms training and supply business, whose growth led to the conceptualization of a luxury indoor shooting range. My partners and I founded the Scottsdale Gun Club, which at the time of the facility opening (2004) was the world's largest and most luxurious public indoor range, creating a new market segment.

4. While developing the Scottsdale Gun Club, my partners and I operated The Armory gun store, which focused on self-defense and tactical products and training. My position was Founder and Vice President of Sales and Marketing for the Scottsdale Gun Club and at the time we created an entirely new model of high-end shooting and retail facilities. In addition to my sales and marketing roles, I was responsible for our product selection and purchasing. The Scottsdale Gun Club retained its tactical firearms and training roots and was nationally known as the leader

¹ 3 Gun is a speed and accuracy sport, where the athlete uses the three platforms of semi-automatic firearms – rifles, pistols, and shotguns – all with what were considered large capacity magazines.

in that category. We were doing such high volume in those categories we started a firearms and ammunition distribution business to resell products to other gun stores. Prominent firearms manufacturers would consult with me on their potential expansions into tactical market segments. Notably, we also launched a manufacturing brand, U.S. PALM, that developed and produced a line of high-tech polymer 30rd magazines for AK pattern rifles. These magazines are still manufactured and distributed nationwide.

5. In 2010, I transitioned from the dealer and distributor side of the industry into sales for FNH USA, LLC (later becoming FN America, LLC), which is a subsidiary of Fabrique Nationale out of Herstal, Belgium. In the South Carolina manufacturing facility FN has produced a multitude of arms for the US Military to include the M4, M16, M249, M240, and MK19. FN also began developing a robust commercial presence of which I was a part. Over six years, I rose to the position of Senior Director of Commercial Sales. I also was on the FNH USA professional shooting team. During my tenure at FN, I contributed to many aspects of the commercial business for US operations, including sales, product management, production forecasting, and marketing. At FN America we produced and marketed both pistol and rifle lines, almost all were sold with “large capacity” magazines as the standard offering. I have first-hand knowledge of the changes within the firearms industry market over the past several decades and I have been able to create consistent growth of the core business even in unstable market conditions. I worked closely with the production and engineering side of the company. With those departments, I principally directed the design for most models in the FN-15 line, working to define the market position and models for the consumer, which included both Law Enforcement and Commercial markets. The FN-15 is the company’s AR-15 style line of rifles. Additionally, I conceptualized and worked with the team

to design a high-end collector line of firearms, known as the Military Collector Series. These firearms included semi-automatic versions of American military issue firearms: the M4, the M16, and the M249 which generated over \$10million in revenue the first year of production.

6. In 2016, I became the Vice President of Sales and Marketing for Surefire, LLC, a company that specializes in tactical illumination devices, firearm suppressors, and “large capacity” magazines for AR-15 style rifles for the civilian, law enforcement, and military markets. At Surefire, I managed US commercial and law enforcement business. Internationally, I managed commercial, law enforcement and military markets. In 2019, I became the President of Global Sales and Marketing for Ammo Inc. and in just over 3 years sales increased from \$4M to \$240M. I was responsible for all sales, marketing, and product development activities including the design and development of specialty cartridges for US Special Operations Command. I successfully competed for and won several government contracts in a short period of time. AMMO acquired GunBroker.com, the largest internet marketplace for the firearms industry in 2021. In 2022, I joined the team at Timney Triggers as their Vice President of Sales, thanks in large part to my rich and well-rounded knowledge of the firearms industry. Due to my high-profile positions in a range of companies that directly impact the conversation about firearms technology available to the public and the military, as well as the ammunition side of the market. I am uniquely qualified to discuss this matter.

7. As I have previously stated, not only is my experience in the industry as an executive, but as a shooter and collector. I have personal experience purchasing and using “large capacity magazines” prior to 1994 and continuing both throughout the entire 10 years of the federal ban. I also have an extensive background of practical application as a professional shooter. I have

held multiple world, national, and state shooting titles across disciplines for over 25 years. Notably, I was a part of the 3 Gun National Pro Tour for six years, as a regular finalist and 2012 overall runner up. 3 Gun Nation was a television show that aired on NBC Sports and Sportsman Channel promoting the practical shooting use of semi-automatic rifles, pistols, and shotguns with “large capacity” magazines.

8. Due to my professional background within the firearms industry, I have served on the Board of the American Suppressor Association and have regularly appeared as an on-camera expert for the National Shooting Sports Foundation, the Outdoor Channel’s Gun Stories with Joe Mantegna, and Gallery of Guns TV. I have also been an industry guest speaker for college students at institutions such as the School of the Art Institute of Chicago and the W.P. Carey School of Business’ MBA Program.

Scope of Work

9. In this document, I will provide a general statement on the popularity of AR-15 style and similar rifles and their popularization on the firearms market, with a specific emphasis on limitations in advertising and other avenues that contributed to this robust market. I will then discuss the importance of magazines to the fundamental operation of a semi-automatic firearm, as well as address their extensive use before and after 1994 and the ways in which manufacturers have responded to the changing in legislation. I will conclude the discussion surrounding the 1911 style semi-automatic pistol and its waning popularity in a defensive handgun market in favor of smaller caliber and higher capacity pistols.

10. For the purposes of this report, I will use the terms “high capacity” magazine and “large capacity magazine” and the abbreviation “LCM” interchangeably to reference magazines capable of holding more than ten rounds. I use the terms as they relate to the ways in which they

are referenced in documents and the way they are defined in the Violent Crime Control and Law Enforcement Act (1994).

AR-15 and Civilian Popularity

11. The demand for AR-15s and similar rifles grew steadily since their inception and continued through the 1994-2004 federal “Assault Weapons Ban” (AWB). The Colt AR-15 first became available on the commercial market in 1964. In addition to the domestic production, throughout the 1970s and 1980s, semi-automatic rifles with “large capacity magazines”, similar in style and function, were imported into the United States for sale to the commercial market. These comparable rifles followed an overarching trend in firearms design towards smaller calibers with larger magazine capacities. A few notable examples of these were manufactured by Beretta, Daewoo, FN, HK, IMI, SIG, STEYR, as well as several AK pattern rifles. The importation of these foreign made rifles, however, was restricted in 1989. Domestic manufacturers such as Colt, Bushmaster, Olympic Arms, Pac-West Arms, Eagle Arms / Armalite, and DPMS that were previously building AR-15 style rifles continued, for the most part, with production of slightly modified rifles to comply with the new federal regulations. These rifles increased exponentially in popularity as more consumers became aware of them, as they have many benefits for a multitude of applications including personal defense, target shooting, competition, and hunting. The AR-15 style of rifle is lightweight, has low recoil, is relatively easy to learn how to use, can be customized by the consumer, and is easily adjustable to fit most users of varying sizes and physical abilities. During the AWB period, many companies were discouraged from investing in production capacity to enter the AR-15 style rifle market due to legislative uncertainty. In the years following the sunset of the AWB more recognizable brands such as Smith & Wesson, Ruger, Sig Sauer, FN, and

Remington were willing to invest the capital and enter the market. These well-known and trusted brands responded to market demand for AR-15 style rifles manufactured by established companies.

12. There is a lot of debate surrounding the effectiveness of advertising and its impact on the consumer. In terms of firearms marketing, however, it is important to note that there are significant limitations on the manufacturer due to the nature of the product which must be considered when analyzing how successful and how much of an impact firearms industry marketing has had on consumer decision making.

Marketing and Advertising Limitations and Considerations

13. As a Senior Executive at one of the larger firearms manufacturers in the world, I have been responsible for determining the firearms product mix and production quantities based on the marketplace. Most manufacturers forecast their future sales, and corresponding production, to match the products and quantities their customers are demanding rather than the other way around. It's common sense to manufacture and deliver what your customers are asking to purchase. Beyond those core product sales, companies introduce new products to market that are either a variation of a core product, a direct response to new customer demand, or a totally new concept product. Consumer demand for the AR-15 style and similar rifles, along with "high capacity" magazines for both rifles and pistols, has been the market driver for the increased production and sales.

14. Some assert that the gun industry is responsible for collectively pushing AR-15 style rifles and "high capacity" magazines onto the market – a notion that fails to consider the myriad of factors that influence consumer purchasing behavior. There are many fine marketing

professionals in the industry capable of creating innovative campaigns, but they still are forced to compete for consumer attention without access to most standard marketing avenues. Marketing is severely restricted and companies in the firearms industry are prohibited or limited when using typical services to sell to the consumers through means of television, Google Ads, e-commerce platforms, merchant payment processing services and mainstream social media (Facebook, Instagram, YouTube, etc.). Without the ability to advertise via most technology, industry does its best to respond to consumer demand with antiquated feedback channels. Most firearms industry advertising is limited to endemic periodicals, limited cable television channels such as the Outdoor Channel, and websites visited directly by consumers or found through organic search results.

15. While firearms manufacturers have had restrictions imposed upon on their abilities to market, there are other factors to consider for the proliferation and popularity of the AR-15 and similar rifles that were completely outside of the scope of the industry. For example, the Global War on Terror (GWOT) starting in 2001 produced images and video of American service members with their rifles and tactical gear, which was broadcast across major media outlets. In the early years of the war, the televised GWOT exposed the entire American consumer market to the likeness of the iconic Colt and FN M4/M16 fueling awareness of the semi-automatic commercial AR-15 style rifle. The War on Terror has continued for decades, and a generation of consumers, including service members, now desired to own AR-15 style semi-automatic rifles. There is a long history of service rifles becoming familiar to the generation that used them in conflict, and the resulting desire to bring those rifles home from service and onto the shooting range and into the field for sporting uses.

16. However, the Hughes Amendment, a portion of the Firearm Owners' Protection

Act of 1986, which essentially banned the civilian ownership of machine guns made after 1986, prevents this practice in some form from continuing. The military issued machine guns are no longer allowed to be transferred, but the desire to own and use the issued rifles has not subsided. While in my role at FN America, I directed the design and sales for most of the commercial FN15 model rifles. Additionally, I was instrumental in creating and launching the Military Collector Series consisting of the FN15 M4, FN15 M16 and FN M249s. This Military Collector Series was comprised of semi-automatic replicas of the government issued M4, M16, and M249. These rifles were exceptionally well received by general commercial customers and service members desiring a replica of their issued rifle. The consumer demand for these rifles for sport and self-defense was driven mainly by the customer's familiarity with the designs either through service or media exposure.

17. Today the AR-15 style rifle is one of the most popular rifles in America. However, that popularity was not just engineered by the firearms industry, who have limited advertising channels. Rather, the popularity of this firearm has more to do with the design's features, benefits, and adaptability to be well suited for a wide array of legitimate uses. These rifles are commonly used for lawful purposes, including target and sport shooting, and they are also good for use in self-defense situations due to most owners' familiarity with the rifle. To quantify the acceptance and widespread adoption of these rifles, it is of note that according to the 2021 National Firearms Survey (expanded May 2022) about 24.6 million people, have owned an AR-15 or similarly styled rifle, and up to 44 million such rifles have been owned.²

² English, William, 2021 National Firearms Survey: Updated Analysis Including Types of Firearms Owned (May 13, 2022). Georgetown McDonough School of Business Research Paper No. 4109494, Available at SSRN: <https://ssrn.com/abstract=4109494> or <http://dx.doi.org/10.2139/ssrn.4109494>

“Large Capacity Magazines” and the Firearms Market

18. Some assert that “large capacity magazines” (LCM) are only recently popular, which is a specious argument. In 1993, the year prior to the 1994 federal ban, semi-automatic pistols accounted for 80% of handguns produced in the US.³ According to Christopher S. Koper in his 2004 Updated Assessment of the Federal Assault Weapons Ban: Impacts on Gun Markets and Gun Violence, 1994-2003 report “*Approximately 40 percent of the semiautomatic handgun models and a majority of the semiautomatic rifle models being manufactured and advertised prior to the ban were sold with LCMs or had a variation that was sold with an LCM*”.⁴ This study clearly illustrates the significance of large capacity magazines on the market even before the Federal Assault Weapons Ban. Today, that trend continues to grow. The 2021 National Firearms Survey (expanded May 2022) reported:

48.0% of gun owners, about 39 million people, have owned magazines that hold over 10 rounds, and up to 542 million such magazines have been owned.⁵

19. As far as I am aware, the legal concept at the federal level of using the arbitrary quantity of greater than 10 rounds to define a magazine as a “large capacity ammunition feeding device” first appeared in the Violent Crime Control and Law Enforcement Act of 1994. Since the inception of magazine fed firearms, designers explored magazine designs and manufacturing methods to maximize intended functionality and reliability of their firearms without arbitrary capacity limitations. It wasn’t until restrictions were legally mandated did engineers modify or

³ (Zawitz, 1995, p. 3). PDF attachment

⁴ <https://www.ojp.gov/pdffiles1/nij/grants/204431.pdf>

⁵ English, William, 2021 National Firearms Survey: Updated Analysis Including Types of Firearms Owned (May 13, 2022). Georgetown McDonough School of Business Research Paper No. 4109494, Available at SSRN: <https://ssrn.com/abstract=4109494> or <http://dx.doi.org/10.2139/ssrn.4109494>

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alter their designs to conform to a random capacity limit. In order to comply with capacity laws, manufacturers were compelled to redesign or modify existing standard capacity magazines to limit their capacity to hold no more than 10rds, with severe consequences if an 11th round can still be forced in the magazine. Often the regulations are left ambiguous and subject to court interpretation after the fact as to what constitutes a permanent modification preventing the magazine from being considered readily convertible back to standard capacity. Manufacturers make every effort to avoid exposing themselves and their customers to this legal risk. Reducing the standard capacity of a magazine to hold 10 or fewer rounds has been accomplished through a variety of methods, some of which result in a less than optimal magazine design while potentially introducing a higher risk of failure, increased costs, and often adding unnecessary complexity. Some of the methods used to reduce capacity include:

1. Narrowing of the internal width down the entire length of the magazine, altering the internal geometry from the original design intent.
2. Creating indentations in the side of the magazine designed to limit the downward travel of the follower in the magazine tube. This method is sometimes coupled with weakening cuts made to the remainder of the circumference of the magazine tube adjacent to the indentations. In this design the magazine spring usually extends to the baseplate and is at risk of catching or hanging up on the indentations, impeding normal operation.
3. Shortening the magazine tube in conjunction with designing a novel base pad that extends upward into the firearm to connect with and complete the magazine assembly. These base pads with magazine tube extender pieces are more complicated to use, costly to manufacture, and their increased complexity invites a possible reduction in structural integrity.
4. Inserting an object into the magazine to limit follower travel and permanently attaching the base pad to encapsulate the object in the magazine tube. Permanently attaching a base pad prevents disassembly to properly clean the magazine, resulting in a severe degradation of performance and reliability.
5. Installing a pin or rivet through the exterior of the magazine body to limit the travel of the follower.

Magazines are an Integral Part of a Firearm

20. The burden on the manufacturers to produce these 10rd or less magazines was reduced with the sunset of the AWB in 2004. The few states remaining with their own capacity limits require manufacturers to continue to modify their products as described above to comply with the restrictions. This increases costs for manufacturers to design or redesign magazines, producing lower quantities of the restricted magazines that potentially don't reach the manufacturing amounts required to realize volume savings. Manufacturers may also choose not to offer the affected models for sale to the residents of the restrictive state, reducing the options for those residents to select from.

21. Magazine fed firearms are systems with many parts that must function together in order to operate properly, and the ammunition feeding device is critical to the overall performance and success of the firearm. To this day, especially in modern handguns, the magazine is often the cornerstone of the pistol design. Unless designing a new pistol to utilize an existing magazine, engineers will start a new pistol project with designing the magazine first. The ammunition feeding device must be optimized to reliably deliver cartridges into the operating system. The engineers must consider the dimensions of the cartridge, with specific attention to the cartridge case being either a straight wall or a tapered case, and angles at which the magazine presents cartridges to the action. The manner in which the magazine and action interface is critical. The remainder of the firearm design builds upon the foundation laid by the magazine's form. Many, if not most, modern pistols are built around a magazine designed to hold more than 10 rounds. Pistols designed for defensive use balance maximizing the number of rounds carried for personal protection within a size constraint of the pistol to perform its intended function. Even though subcompact pistols are

designed primarily for concealment and safety while carrying, designers also attempt to maximize magazine capacity as well. Pistols designed for recreation, sport, and competition are usually designed to maximize capacity, accuracy, and reliability with few constraints on size.

22. As an integral part of the firearm, magazines are required for proper function. While firearms are one of the few consumer items designed for several lifetimes of service, their magazines are an item that can degrade with use. In addition to the routine maintenance of replacing springs and worn followers, feed lips of magazines which hold the next round in position to be presented to the action, may both wear and crack from the cycling of the action. Magazines and their feed lips are also susceptible to bending, cracking, denting, or deforming and being rendered unserviceable when dropped during normal use. This is not uncommon, and therefore, not an exceptionally rare occurrence that would only affect high volume shooters. Shooters run the risk of damaging a magazine every time they practice a reload and eject a magazine onto the ground.

23. A prudent firearms owner will purchase enough magazines to sustain the use of their firearm as intended over the remainder of their lifetime, accounting for damaged and worn-out magazines along the way. Many handguns and rifles have proprietary magazines that are specific to the manufacturer, product family, and many times the specific model. Replacement magazines may not be available in the future as there is no guarantee the manufacturer will be in business to support the platform, and there is no guarantee that an aftermarket company will produce that specific magazine. A firearm without a functional magazine is of little use to an owner, and of little value to another consumer. There is less risk for consumers that possess firearms capable of accepting a magazine with a somewhat standardized interface. These firearms

are generally older legacy designs that were used in rifles and pistols adopted by militaries. Magazines for the AR-15 style rifles, AK pattern rifles, and model 1911 pistols fall into this category. Previously owned proprietary magazines that become damaged during use, may be refurbished by the consumer through the replacement of damaged parts. During the 1994-2004 AWB period, individual manufacturers would not sell consumers all the magazine components required to build a new magazine. Some would designate a single component of the magazine as their control item and refuse to sell that item to consumers. Any consumer needing to repair a legally owned pre-ban magazine was out of luck if they had broken or damaged the restricted part.

24. As previously stated, magazines are so critical to the firearm, engineers often start the design of a new firearm around the magazine. Magazines are a highly specialized item to manufacture, whether they are stamped and welded from steel or aluminum, injection molded from an advanced polymer, or a combination of stamped feed lip and mag catch parts over-molded into a polymer body. These specific manufacturing processes require specialized equipment, skillsets, and sometimes stabilized environments not found in most firearms manufacturing facilities. Firearms manufacturers choose to utilize the services of highly skilled outside vendors to deliver a superior product built to their design specifications precisely because of the importance of the magazine in the overall system. As an added benefit to all commercial, law enforcement, and military customers, these specialized magazine companies have grown and matured and are far more capable to produce significantly higher quality products for the entire marketplace. Magazines built today are some of the most advanced magazines in history and as a result, are structurally safer and more reliable for the end user. Gun barrels and other critical components are also routinely outsourced to specialized manufacturers. For example, a firearm manufacturer may

specify a hammer forged barrel to meet safety and performance standards, and it would be absurd to contend the mere act of outsourcing somehow reduces the importance of the barrel.

25. The magazine is correctly considered an integral part of the firearm, not merely an accessory. It is considered such a vital part of the firearm that the magazine's value is included in the cost of the firearm for calculation of the Firearms and Ammunition Excise Tax (FAET) paid by the manufacturer or importer.⁶ It is only additional magazines that are treated as non-taxable extra parts. To contrast, accessories, even if included with the firearm, are not subject to FAET. Typical examples of accessories include holsters, cleaning kits, gun locks, optics, and other accoutrement not critical to the function of the firearm.

Consumer Demand and Defensive Pistol Selection

26. Some point to the century old 1911 design as the foundational basis to claim 7 or 8 rounds of ammunition is more than adequate for a defensive pistol. However, there are a multitude of shortcomings with the anecdotal statements often employed to support this position. There are many pistols that are more effective for self-defense while offering a superior balance of reliability, affordability, and capacity. It is widely understood that most of the less expensive models of 1911s, and even many of the mid-level price point pistols in the \$1000-\$1500 range from companies like Colt and Kimber may require an additional investment in gunsmithing services to make them suitably reliable for defensive use. Many people cannot afford one of the higher priced 1911 pistols that are generally suitable for defense from the manufacturer, nor can everyone handle the recoil of the .45 ACP and have the confidence to defend themselves with the 7 or 8 rounds available. Persons of a smaller stature and/or having reduced strength may select a 1911 design

⁶ <https://www.ttb.gov/images/pdfs/presentations/FAET-Return-Walkthrough.pdf>

pistol in 9mm for its reduced recoil, but in turn they are accepting the accompanying risk of using single stack 9mm magazines which are inherently less reliable due to the tapered case of the 9mm cartridge. The 1911 design is also less intuitive and requires more familiarity and training for novice shooters to master. For these and other reasons, many of the leading firearms trainers in the country recommend a multitude of superior modern design pistol options for self-defense firearms.

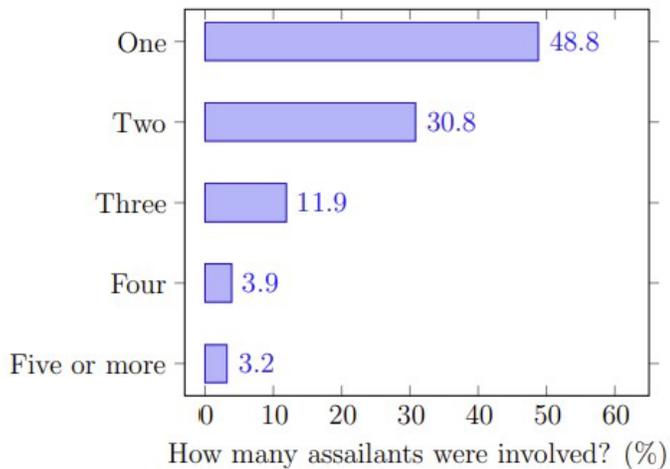
27. In comparing aggregated data on broad categories of self-defense pistols, the BATF&E's 2020 Annual Firearms Manufacturing and Export Report does not give specific model information, but rather we can make inferences from the pistol category, which is broken down into caliber ranges. We find there were just shy of 3.9 million 9mm and .380 pistols manufactured in 2020, and in comparison, just over 705,000 pistols comprise the up to .50 caliber category.⁷ This category includes all pistols chambered in .45 ACP, not just 1911s, as well as additional designs and calibers such as the .40 S&W, making the 1911 production somewhere below that ceiling. With further examination of the manufacturer's individual reporting data, it is evident the market clearly indicates significantly higher demand for modern pistols in smaller calibers and higher capacity than .45 ACP pistols.

28. The 2021 National Firearms Survey (expanded May 2022) provides pertinent information regarding the carry and use of firearms for self-defense. Information and graph from the Survey:

31.1% of gun owners, or approximately 25.3 million adult Americans, have used a gun in self-defense. Gun owners engage in approximately 1.67 million defensive uses of firearms per year. Handguns are the firearm most commonly used in defensive incidents (65.9%) The majority of defensive gun uses take place outside of the home (74.8%). About half of defensive gun uses involve more than one assailant (51.2%).

⁷ 2022.06.10_afmer_2020_cover_sheet_508 (1) PDF Attached
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29. Conclusions drawn in the survey state that “presumably, it would be advantageous to have a firearm with a larger capacity magazine if one needed to engage more than one assailant, which these responses suggest is indeed common. Although in most defensive gun uses the gun was not fired (81.9%), we can further analyze the subset of incidents in which a gun was fired. In 67.8% of these cases in which a gun was fired in self-defense, multiple rounds were fired.”⁸

Conclusion

30. It is my findings, as an industry expert with a range of backgrounds in the tactical firearms market and culture, that several factors contributed to the popularity of the AR-15 style and comparable rifles starting in the 1960s and that this phenomenon is not solely the result of an industry marketing scheme. Furthermore, I conclude that large capacity magazines have been popular since well before their 1994 regulation and rebut any assertion that these magazines are not ubiquitous. Additionally, I provided a perspective on the importance of a magazine to firearms

⁸ English, William, 2021 National Firearms Survey: Updated Analysis Including Types of Firearms Owned (May 13, 2022). Georgetown McDonough School of Business Research Paper No. 4109494, Available at SSRN: <https://ssrn.com/abstract=4109494> or <http://dx.doi.org/10.2139/ssrn.4109494>

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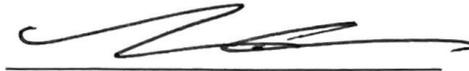
design as well as ways in which the industry have improved these magazines to be of superior technology ultimately being fundamentally safer. I finish the report with an analysis on the proliferation of smaller caliber and higher capacity self-defense handguns that have far surpassed the production and popularity of the 1911 style design in today's gun ownership community. Finally, I note that many of the pistols that have a common magazine capacity that exceeds 10 rounds are useful in self-defense and for other lawful purposes.

Dated this day of December, 2022.

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Dated this 15th day of December, 2022.



Mark Hanish
Declarant