

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

MICHELLE LANE, et al.	)	Case No. 1:11-CV-503-GBL/TRJ
	)	
Plaintiffs,	)	DECLARATION OF
	)	MATTHEW WELLING
v.	)	
	)	
ERIC HOLDER, et al.,	)	
	)	
Defendants.	)	
_____	)	

**DECLARATION OF MATTHEW WELLING**

I, Matthew Welling, am competent to state and declare the following based on my personal knowledge:

1. I currently reside in the District of Columbia.
2. I am over the age of 21, am not under indictment, have never been convicted of a felony or misdemeanor crime of domestic violence, am not a fugitive from justice, am not an unlawful user of or addicted to any controlled substance, have not been adjudicated a mental defective or committed to a mental institution, have not been discharged from the Armed Forces under dishonorable conditions, have never renounced my citizenship, and have never been the subject of a restraining order relating to a child or an intimate partner.
3. Several homes on the Capitol Hill block where I live with my wife and infant son have been burglarized in recent years. We have experienced theft from our patio and car. I am concerned for our family's safety, and want to have a handgun at our home for self-defense. We would like to accept the offer of my father-in-law, David Slack of Texas, to gift us a handgun for our use in home self-defense. I have verified that the handgun, a Glock 19, is legal for us to

possess in Washington, D.C. Slack would transfer the handgun to my wife Amanda through a federal licensee in Virginia near our home. In case of emergency, I could use the handgun as well.

4. I find it burdensome and expensive to make multiple trips between gun stores outside the District of Columbia, the police station, and Charles Sykes's office (or any other location to which he would move) inside the District, just to purchase a handgun. I also find it burdensome and expensive to pay the costs of transferring guns from an out-of-state federal firearms licensee to Charles Sykes, and then to pay Sykes's \$125 transfer fee, just to acquire a handgun.

5. While the handgun from my father-in-law would be a welcome addition in our house, I would participate more frequently in the market for handguns in the absence of restrictions on the acquisition of handguns from out-of-state.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 19<sup>th</sup> day of June, 2011.

  
\_\_\_\_\_  
Matthew Welling