

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

**MICHELLE LANE, MATTHEW WELLING,)
AMANDA WELLING and SECOND)
AMENDMENT FOUNDATION, INC.,)**

Plaintiffs,)

v.)

No. 1:11-cv-503 GBL/TRJ

**ERIC HOLDER, Attorney General of the)
United States; W. STEVEN FLAHERTY,)
Superintendent, Virginia State Police; and)
DISTRICT OF COLUMBIA,)**

Defendants.)

DECLARATION OF PATRICIA POWER

I, Patricia Power, pursuant to 28 U.S.C. § 1746(2), do hereby declare and say as follows:

1. I am the Chief of the Federal Firearms Licensing Center (FFLC), Firearms and Explosives Services Division, Office of Enforcement Programs and Services, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice.
2. Pursuant to 18 U.S.C. § 923(a), no person shall engage in the business of dealing in firearms until he or she has filed an application with, and received a license to do so from the Attorney General. Moreover, pursuant to 27 C.F.R. § 478.47, upon receipt of a properly executed application for a license the FFLC will, upon determining the applicant is qualified, issue the appropriate license.
3. In my capacity as Chief of the FFLC, I have immediate legal custody of the records of ATF pertaining to Federal firearms licenses for all persons or entities which make application for or are issued such licenses, including within the District of Columbia, to

engage in the business as firearms or ammunition importers, manufacturers, dealers, or activity as collectors.

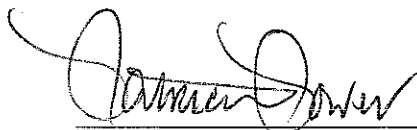
4. In my capacity as Chief of the FFLC, I have caused the records to be searched for persons or entities which currently hold a Federal firearms license as a dealer in firearms in the District of Columbia. As of June 2011, there were six individuals or entities licensed as Federal firearms dealers in the District of Columbia. The licensees and their business premises are as follows:

- Sykes, Charles W. 1213 Good Hope Rd SE, 2d Floor, Washington, DC 20020
- Sugarmann, Joshua Alan 1730 Rhode Island Ave NW #1014 Washington, DC 20036
- Heng, Harry Fook Suan 2800 Woodley Rd NW, #317, Washington, DC 20008
- Washington Drama Club Sixth St & Maine Ave SW, Washington, DC 20024
- Shakespeare Theatre 450 Seventh St NW, Washington, DC 20004
- Second Amendment Safety & Security LLC 6406 Georgia Ave NW, Washington DC 20012

5. There is one entity licensed as an importer of firearms in the District of Columbia. A licensed importer may also conduct firearms transactions as a dealer without acquiring a separate dealer's license. The importer is Intra Pax, LLC located at 1455 Pennsylvania Avenue, NW, Suite 400, Washington, DC 20004.

6. In addition to the above records, there are two administrative license records in the District of Columbia that are for the internal administrative use of ATF.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of July 2011.



Patricia Power
Chief
Federal Firearms Licensing Center