
**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DAMIEN GUEDES, <i>et al.</i>	:	
	:	
Plaintiffs	:	
v.	:	Civil Action No. 1:18-cv-2988
	:	
BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES, <i>et al.</i>	:	
	:	
Defendants	:	

DECLARATION OF SEAN CARANNA

I, Sean Caranna, declare as follows:

1. I am the Executive Director of Florida Carry, Inc., which is a named institutional plaintiff in this action. I have personal knowledge of the facts stated herein, have reviewed the Complaint, Motion for Preliminary Injunction and Memorandum of Points and Authorities in Support of the Motion for Preliminary Injunction, and if called as a witness could competently testify thereto.
2. This declaration is executed in support of Plaintiffs’ Motion for a Preliminary Injunction in this matter. Specifically, preliminary injunctive relief is requested to prevent the Defendants from implementing and enforcing its newly enacted regulation stemming from Docket No. ATF-2017R-22 (“Final Rule”), which criminalizes the mere possession of a “bump-stock-type device” in violation of numerous statutory and constitutional provisions as averred in the Complaint.
3. Plaintiff Florida Carry, Inc. (“Florida Carry”) is a Florida not-for-profit corporation whose purpose is to defend and advance the fundamental civil right to keep and bear arms as guaranteed by the Second Amendment to the United States Constitution and the Constitution of Florida, Declaration of Rights.
4. Florida Carry has over 30,000 registered members and supporters, including members residing in all counties through the state of Florida and in other states.
5. Florida Carry owns a Slide Fire bump-stock-device, which is currently retained in Alabama. But for Defendants passage of the Final Rule, Florida Carry, its members and

supporters would continue to lawfully possess and utilize their bump-stock-devices. Due to Defendants passage of the Final Rule, in the absence of this Court enjoining the implementation and enforcement of the Final Rule, Florida Carry, its members and supporters, and those similarly situated thereto, must decide whether to be deprived of their lawfully owned property or face criminal prosecution, where they can be subjected to 10 years in jail, \$250,000.00 in fines and forfeiture of the vessel the bump-stock-device is found in, per violation. As such, Florida Carry, its members and supporters who own bump-stock-type devices reasonably fear arrest, prosecution, fine, and incarceration if they do not destroy or turn over their lawfully purchased and possessed bump-stock-devices.

6. Unless the Defendants are enjoined, our organization, its members and supporters will be deprived in perpetuity of their lawfully obtained and possessed property, namely, their bump-stock-type devices affected by the Final Rule.
7. Unless the Defendants are enjoined, Florida Carry, its members and supporters will be forced to surrender or destroy their bump-stock-devices, which they would otherwise continue to lawfully possess and utilize.
8. Plaintiffs are accordingly requesting that the Court enjoin the Defendants from implementing and enforcing the Final Rule, in order to preserve the status quo, until the Court can render a final decision in this matter.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my information, knowledge and belief.

Date: December 21, 2018

Sean Caranna

Sean Caranna