

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION

ALAN KACHIALSKY, et al.,	:	Case No. 10-CV-05413-CS
	:	
Plaintiffs,	:	DECLARATION OF
	:	JULIANNE VERSNEL
v.	:	
	:	
SUSAN CACACE,	:	
	:	
Defendants.	:	
	:	
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DECLARATION OF JULIANNE VERSNEL

I, Julianne Versnel, am competent to state, and testify to the following based on my personal knowledge:

1. I am the Director of Operations for the Second Amendment Foundation, Inc. ("SAF").
2. SAF is a non-profit membership organization incorporated under the laws of Washington with its principal place of business in Bellevue, Washington. SAF has over 650,000 members and supporters nationwide, including many in Westchester County, New York. The purposes of SAF include promoting the exercise of the right to keep and bear arms; and education, research, publishing and legal action focusing on the Constitutional right to privately own and possess firearms, and the consequences of gun control.
3. SAF expends its resources encouraging exercise of the right to bear arms, and advising and educating their members, supporters, and the general public about the policies with respect to the public carrying of handguns in New York. The issues raised by, and consequences

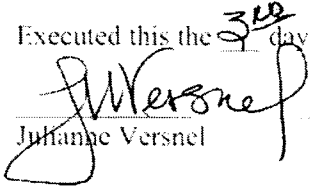
of. Defendants' policies, are of great interest to SAF's constituency. Defendants' policies regularly cause the expenditure of resources by SAF as people turn to it for advice and information.

4. Defendants' policies bar SAF's members and supporters from obtaining permits to carry handguns.

5. SAF's members and supporters regularly carry functional handguns in public for self-defense where allowed. SAF's members and supporters in New York would do so, but refrain from doing so because they fear arrest, prosecution, fine, and imprisonment for lack of a license to carry a handgun.

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

Executed this the ^{3rd} day of January, 2011.


Julianne Versnel