

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

DAVID McCANN and KIRK
LAUNIUS,

Plaintiffs,

v.

PAMELA BONDI, *U.S. Attorney
General, in her official capacity as
United States Attorney General,*

Defendant.

Civil Action No. _____

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

INTRODUCTION

1. In *Firearms Policy Coalition, Inc. v. Bondi*, No. 4:24-CV-00565-O (N.D. Tex. 2025), this Court held that 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l) place unconstitutional restraints on plaintiffs' right to bear arms in violation of the Second Amendment.

2. This Court limited relief to the plaintiffs in that case, members of the Firearms Policy Coalition and the Second Amendment Foundation. *Id.* at 17.

3. Plaintiffs here are regular firearm carriers who are forced to bring their own lawsuit, alleging identical claims to secure the same rights, as Plaintiffs are not members of either organization involved in the previous case.

4. Collateral estoppel should be applied against the Defendant, as this Court need not force Plaintiffs here to relitigate the same claims in the same court.

PARTIES

5. David McCann is a long-time resident of Tarrant County, Texas. Every day he lawfully carries a concealed firearm for self-defense at home and in public.

6. Mr. McCann regularly stays up to date on best practices and current laws and regulations about guns. He also regularly participates in simulated trainings for proper gun use and situational deescalation.

7. Based on his extensive research and training, he believes that continuous carry is the safest and most responsible approach to self-defense with a firearm. For that reason, he wants to carry his firearm into the United States Postal Offices in Texas, and onto postal property.

8. Plaintiff Kirk Launius is a U.S. Navy veteran, a former police officer for the City of Dallas, and resident of Dallas County, Texas who also regularly and lawfully carries a firearm.

9. Mr. Launius also believes that the continuous carrying of a firearm is the best practice for self-defense.

10. As a former police officer, Mr. Launius is aware of the prevalence of local crime and the possibility that prior criminals may target him due to his police work.

11. Mr. Launius would also carry his firearm into the United States Postal Offices, and onto postal property, in Texas if it were permitted.

12. Defendant Pamela Bondi is the United States Attorney General. As such, Defendant Bondi leads the United States Department of Justice and is responsible for enforcing 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l) at issue in this case.

JURISDICTION AND VENUE

13. This is an action arising under the Second Amendment of the United States Constitution; thus this Court has subject-matter jurisdiction over this action and may grant injunctive relief under 28 U.S.C. § 1331 since it is a matter of federal law. Declaratory relief is authorized by 28 U.S.C. §§ 2201 and 2202, as well as Federal Rule of Civil Procedure 57.

14. There is an actual controversy between the parties concerning the lawfulness of 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l). The plaintiff's injuries are concrete and particularized and those injuries are redressable by this Court.

15. Venue is proper in this District under 28 U.S.C. § 1391(e)(1)(C) because Plaintiff McCann lives in Tarrant County, Texas.

GENERAL ALLEGATIONS

16. Plaintiffs bring this action challenging the constitutionality of 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l) for violating their Second Amendment Right to carry their firearms in United States Postal Offices.

17. The Second Amendment of the United States Constitution states: "A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed." U.S. CONST. amend II.

18. To determine whether a plaintiff's Second Amendment rights are violated by a statute, the Court in *N.Y. State Rifle & Pistol Ass'n v. Bruen*, stated that "the standard for applying the Second Amendment is as follows: When the Second Amendment's plain text covers an individual's conduct, the Constitution presumptively protects that conduct. The government must then justify its regulation

by demonstrating that it is consistent with the Nation’s historical tradition of firearm regulation.” 597 U.S. 1, 24 (2022).

19. As established in *Bruen*, publicly carrying a firearm for self-defense is covered by the Second Amendment. *Id.*

20. 18 U.S.C. § 930(a) states that “whoever knowingly possesses or causes to be present a firearm or other dangerous weapon in a Federal facility (other than a Federal court facility), or attempts to do so, shall be fined under this title or imprisoned not more than 1 year, or both.”

21. A “federal facility” is defined as a building or part thereof owned or leased by the federal government, where federal employees are regularly present for the purpose of performing their official duties.” 18 U.S.C. § 930(g).

22. Accordingly, the 18 U.S.C. § 930(a) bars firearms in United States Postal Offices since it is a federal facility.

23. 39 C.F.R. § 232.1(l) states “no person while on postal property may carry firearms . . . either openly or concealed, or store the same on postal property, except for official purposes.”

24. 39 C.F.R. § 232.1(l) prohibits firearms on postal property, which includes parking lots, even when carried lawfully for self-defense.

25. Therefore, the burden is on the government to “affirmatively prove that its firearms regulation is part of the historical tradition that delimits the outer bounds of the right to keep and bear arms.” *Bruen*, 597 U.S. at 19.

26. In *Firearms Policy Coalition, Inc.*, this Court held that plaintiffs' challenge was subject to *Bruen*'s historical analysis. *Supra*, at 7.

27. In *Firearms Policy Coalition, Inc.*, this Court held the burden did not shift to plaintiffs to show that the post office was not a sensitive place. *Id.*

28. This Court held that the government failed to meet its burden in showing that a post office was a sensitive place. *Id.* at 10.

29. As a result, the Court granted plaintiffs' request for a permanent injunction. *Id.* at 15-17.

30. Plaintiffs are not members of the Firearms Policy Coalition or Second Amendment Foundation.

31. Therefore, the government is not enjoined from enforcing 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l) against Plaintiffs.

32. Plaintiffs raise the same challenge to 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l) as plaintiffs in *Firearms Policy Coalition, Inc.* *Id.* at 1.

33. Plaintiffs would carry their firearms into the post office if not for 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l) and the threat of enforcement.

34. Plaintiffs argue that offensive nonmutual collateral estoppel should be applied to their case because their claims against Attorney General Bondi are identical to the claims brought in *Firearms Policy Coalition, Inc.*

35. In *United States v. Mendoza*, the Court prohibited offensive nonmutual collateral estoppel from being applied to the federal government. 464 U.S. 154 (1984).

36. In *Mendoza*, the Court prohibited offensive nonmutual collateral estoppel from being applied to the federal government based on a prior ruling from a different federal district court. *Id.* at 155; See *Mendoza v. United States*, 672 F.2d 1320, 1320, 1323 (9th Cir. 1982), rev'd, 464 U.S. 154 (1984).

CLAIM FOR RELIEF

VIOLATION OF THE SECOND AMENDMENT

37. Plaintiffs incorporate here by reference paragraphs 1 through 55, *supra*, as if fully set forth herein.

38. The Second Amendment of the United States Constitution states: “A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.” U.S. CONST. amend II.

39. Prohibiting firearms at United States Postal Offices falls within the plain text of the Second Amendment and requires *Bruen*’s historical analysis to be applied. *Firearms Policy Coalition, Inc.*, *supra* at 7.

40. 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l) ban firearms from being carried into United States Postal Offices.

41. This Court previously held that the government failed to show that banning firearms at post offices is consistent with the nation’s historical tradition. *Id.* at 10-12. This Court declared 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l) unconstitutional and enjoined the government from enforcing 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l) against members of the Firearms Policy Coalition and Second Amendment Foundation. *Id.* at 14-17.

42. Plaintiffs David McCann and Kirk Launius are not members of the Firearms Policy Coalition or Second Amendment Foundation and would carry their firearms into the post office if it were not for the threat of enforcement.

43. Plaintiffs bring the same claims as plaintiffs in *Firearms Policy Coalition, Inc.*.

44. The Court should apply offensive nonmutual collateral estoppel against the government because *Mendoza* is not binding on identical claims brought in the same court. 464 U.S. 154 (1984).

PRAYER FOR RELIEF

There is an actual controversy between Plaintiffs and Defendants and Plaintiffs have a right to declaratory and injunctive relief. Therefore, Plaintiffs respectfully request this Court:

1. Issue a declaratory judgment that 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l) are unconstitutional under the Second Amendment to the extent they prohibit the possession and carrying of firearms on United States Post Office property;
2. Issue a permanent injunction enjoining enforcement of 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l) to the extent they bar the possession and carrying of firearms on United States Post Office property;
3. Award Plaintiffs the costs of this action and reasonable attorney's fees under 28 U.S.C. § 2412; and
4. Award Plaintiffs other legal and equitable relief as is just and appropriate.

Dated: December 17, 2025

Respectfully submitted,

/s/ Anelise Powers
ROBERT HENNEKE
Texas Bar. No. 24046058
rhenneke@texaspolicy.com
CHANCE WELDON
Texas Bar. No. 24076767
cweldon@texaspolicy.com
MATTHEW MILLER
Texas Bar. No. 24046444
mmiller@texaspolicy.com
ANELISE POWERS
California Bar No. 334883
apowers@texaspolicy.com
TEXAS PUBLIC POLICY FOUNDATION
901 Congress Avenue
Austin, Texas 78701
Telephone: (512) 472-2700

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

DAVID MCCAN and KIRK LAUNIUS

(b) County of Residence of First Listed Plaintiff Tarrant County
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Texas Public Policy Foundation
901 Congress Avenue, Austin, Texas 78701

DEFENDANTS

PAMELA BONDI, U.S. Attorney General, in her official capacity as United States Attorney General

County of Residence of First Listed Defendant _____

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input checked="" type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF	PTF	DEF	
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability		INTELLECTUAL PROPERTY RIGHTS
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability		<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 340 Marine Product Liability		<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 720 Labor/Management Relations	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 751 Family and Medical Leave Act	
<input type="checkbox"/> 190 Other Contract		<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 790 Other Labor Litigation	SOCIAL SECURITY
<input type="checkbox"/> 195 Contract Product Liability			<input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 196 Franchise				<input type="checkbox"/> 862 Black Lung (923)
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		<input type="checkbox"/> 863 DIWC/DIWW (405(g))
<input type="checkbox"/> 210 Land Condemnation	<input checked="" type="checkbox"/> 440 Other Civil Rights	Habeas Corpus:		<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee		<input type="checkbox"/> 865 RSI (405(g))
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence		FEDERAL TAX SUITS
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	Other:		<input type="checkbox"/> 890 Other Statutory Actions
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 540 Mandamus & Other		<input type="checkbox"/> 891 Agricultural Acts
		<input type="checkbox"/> 550 Civil Rights		<input type="checkbox"/> 893 Environmental Matters
		<input type="checkbox"/> 555 Prison Condition		<input type="checkbox"/> 895 Freedom of Information Act
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		<input type="checkbox"/> 896 Arbitration
				<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
				<input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District (specify) _____	<input type="checkbox"/> 6 Multidistrict Litigation - Transfer	<input type="checkbox"/> 8 Multidistrict Litigation - Direct File
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Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. §§ 2201 and 2202 for injunctive and declaratory relief

VI. CAUSE OF ACTION

Brief description of cause:
Challenging 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l) for violation of plaintiffs' Second Amendment rights.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE Hon. Reed Charles O'Connor

DOCKET NUMBER 4:24-cv-00565-O

DATE

SIGNATURE OF ATTORNEY OF RECORD

December 17, 2025

/s/ Anelise Powers

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I.(a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.

Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket. **PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.

VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.

VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. Related Cases. This section of the JS 44 is used to reference related cases, if any. If a related case exists, whether pending or closed, insert the docket numbers and the corresponding judge names for such cases. A case is related to this filing if the case: 1) involves some or all of the same parties and is based on the same or similar claim; 2) involves the same property, transaction, or event; 3) involves substantially similar issues of law and fact; and/or 4) involves the same estate in a bankruptcy appeal.

Date and Attorney Signature. Date and sign the civil cover sheet.

**United States District Court
Northern District of Texas
Fort Worth Division**

DAVID MCCANN and KIRK

LAUNIUS,

Plaintiffs,

v.

PAMELA BONDI, U.S. Attorney

General, in her official capacity as

United States Attorney General,

Defendant.

No. _____

DECLARATION OF DAVID MCCANN

I, David McCann, am a plaintiff in this case and verify the following facts are true and correct:

1. I am a resident of Tarrant County, Texas.
2. I regularly study state and national gun laws, as well as best practices for responsible firearm use, including deescalation strategies.
3. I regularly carry a firearm at home and in public for self-defense.
4. Based on my studies, I believe continuously carrying a firearm is the best practice for self-defense with a firearm.
5. I would carry my firearm into the United States Post Office or onto postal property but for fear of enforcement of 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l).

6. I am not a member of the Firearms Policy Coalition or Second Amendment Foundation.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 16th day of December 2025.

David McCann

David McCann (Dec 16, 2025 14:49:11 CST)

DAVID MCCANN

**United States District Court
Northern District of Texas
Fort Worth Division**

DAVID MCCANN and KIRK

LAUNIUS,

Plaintiffs,

v.

PAMELA BONDI, U.S. Attorney

General, in her official capacity as

United States Attorney General,

Defendant.

No. _____

DECLARATION OF IR LAUNIUS

I, Kir Launius, am a plaintiff in this case and verify the following facts are true and correct:

1. I am a resident of Dallas, Texas.
2. I am a Navy veteran and former City of Dallas police officer.
3. My professional experience has involved firearm training.
4. I also personally study firearm policies and best practices.
5. I regularly carry a firearm in public for self-defense.
6. I carry a firearm every day or at least multiple times a wee .
7. Based on my professional experience and personal knowledge, I believe continuously carrying a firearm is the best practice for self-defense with a firearm.

8. As a former City of Dallas police officer, I have concerns that there may be violent individuals that could target me for my prior work as a police officer.

9. As a former City of Dallas police officer, I am aware of the prevalence of violent crime in the area of Dallas and surrounding areas.

10. I would carry my firearm into the United States Post Office or onto postal property but for fear of enforcement of 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(l).

11. I am not a member of the Firearms Policy Coalition or Second Amendment Foundation.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 16th day of December 2025.



Kirk Launius (Dec 17, 2025 01:10:37 CST)

KIRK LAUNIUS