

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

BRIAN WRENN, et al.,	)	Case No. 15-162-FJS
	)	
Plaintiffs,	)	<b>DECLARATION OF</b>
	)	<b>TYLER WHIDBY</b>
v.	)	
	)	
DISTRICT OF COLUMBIA, et al.,	)	
	)	
Defendants.	)	
_____	)	

**DECLARATION OF TYLER WHIDBY**

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

1. I am a resident of Florida and a United States citizen over 21 years of age. I am also a Federal Firearms Licensee, and operate a gun store in Virginia, where I spend a portion of every year. I frequently travel to Washington, D.C., including with my family, and I also lawfully transport firearms through the District of Columbia in connection with my business. I am fully qualified to possess handguns under federal and District of Columbia law, and I possess a handgun that is capable of being registered in the District of Columbia. I am licensed by Florida to carry a concealed handgun for self-defense.

2. I would carry a functional handgun in public for self-defense and for the defense of my family in the District of Columbia, but refrain from doing so because I fear arrest, prosecution, and fine, as I do not possess a license to publicly carry a handgun in the District of Columbia.

3. I have reviewed the requirements to obtain a handgun carry license from Washington, D.C. Police Chief Lanier. Apart from the "Good Reason" or "Other Proper Reason" requirement, I would be able to qualify for a Washington, D.C. license to carry a handgun.

4. I cannot "show a special need for self-protection, such as evidence of specific threats or previous attacks which demonstrate a special danger to [my] life." I cannot "[a]llege serious threats of death or serious bodily harm, any attacks on [myself], or any theft of property from [my] person." I cannot "[a]llege that the threats are of a nature that the legal possession of a pistol is necessary as a reasonable precaution against the apprehended danger," and have made no police or court reports in Washington, D.C. relating to such threats.

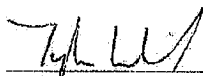
5. I did believe, however, that I had "Other Proper Reasons" for obtaining a handgun carry permit. First, the firearms and related inventory that I transport through the District of Columbia are highly valuable and attractive targets for theft. Second, as the father of young children, it is my responsibility to protect them from any violent crime as they are not physically capable of defending themselves on account of their age. Third, I believe my general interest in self-defense is a sufficient reason to carry a handgun for self-defense.

6. Accordingly, I applied for a Washington, D.C. permit to carry a handgun. I recognize that since I applied, Chief Lanier amended her regulation to clarify that the family members in need of protection by another must have their own independent "Good Reason" for a handgun carry permit.

7. Exhibit C is a true and correct copy of a letter I received from the Metropolitan Police Department, denying my application for a license to carry a handgun.

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

Executed this the \_\_\_ day of February, 2015



\_\_\_\_\_  
Tyler Whidby