

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JEAN BATTY; EDWARD RUSSO; MATT WOLF; PAUL P. BARNETT; CRAIG VACCA; and COMMONWEALTH SECOND AMENDMENT, INC.,)	
)	
Plaintiffs,)	CIVIL ACTION NO.
)	1:15-cv-10238-FDS
-against-)	
)	
KEN ALBERTELLI, in his official Capacity as Chief of the Winchester Police Department; and WILLIAM TAYLOR, in his Official Capacity as Superintendent of the Lowell Police Department,)	
)	
Defendants.)	
)	

DECLARATION OF THOMAS BOLIOLI

I, Thomas Bolioli, declare as follows:

1. I reside in Lynnfield, Massachusetts. I am over 18 years of age and am competent to testify on my own behalf.

2. I am Secretary of the Board of Directors of Plaintiff Commonwealth Second Amendment, Inc. (“Comm2A”). I am authorized to testify on behalf of Comm2A on the matters this Declaration concerns. My testimony comes from my own personal knowledge and from the records of Comm2A.

3. Comm2A is a non-profit corporation organized in Massachusetts with its principal place of business in Natick, Massachusetts. The purposes of Comm2A include education, research, publishing and legal action focusing on the constitutional right of the people to possess and carry firearms.

4. Comm2A's membership includes individuals who hold restricted Licenses to Carry Firearms ("LTC's") issued by the Winchester Police Department. Among others, Jean Batty and Edward Russo (plaintiffs in this action) became members of Comm2A at the commencement of this action.

5. Both members of Comm2A and members of the public contact Comm2A on a regular basis for assistance with Massachusetts firearms laws and licensing. One issue that has repeatedly arisen has been the imposition of restrictions on LTC's, and particularly the restriction for "Target & Hunting." People who have received restricted LTC's throughout the state have contacted Comm2A for information and assistance, including individuals living in Winchester. Our records reveal that at least four individuals, on top of the plaintiffs listed above, have contacted us regarding restrictions that the Winchester Police Department imposed on their LTC's.

6. When members of the public contact Comm2A, Comm2A does what it can to assist them. Oftentimes, one of Comm2A's board members will speak with the person by email and/or by telephone and will provide whatever input or suggestions they legally can, such as providing individuals with pertinent documents or other sources of information, or referring them to retain counsel, and at times providing the names of potential attorneys. People often follow up with Comm2A to update us regarding the outcome of their attempts.

7. The time, energy, and resources that Comm2A spends responding to and addressing requests for assistance that pertain to the imposition of restrictions on LTC's, including (specifically) the imposition of restrictions on LTC's in Weymouth and Peabody, diminish the time, energy, and resources that Comm2A has available to pursue its other organizational priorities. Comm2A would have taken further actions to advance its other

organizational goals, but for the time, energy, and other resources it spends dealing with the issue of restricted LTC's.

I affirm all of the foregoing statements under penalty of perjury under the laws of the United States of America.

Dated: July 8, 2016

A handwritten signature in black ink, appearing to read "Thomas Bolioli", written in a cursive style.

Thomas Bolioli