

Exhibit 3

to

Plaintiffs' Cross-Motion for Summary Judgment

and

**Opposition to Defendants' Motion for Summary
Judgment**

DECLARATION OF ANDREW TURNER

I, Andrew Turner, under penalty of perjury, declare and state as follows:

1. I am over the age of 18, have personal knowledge of the facts and events referred to in this Declaration, and am competent to testify to the matters stated below.
2. I live in Hyattsville, Maryland.
3. I currently own three regulated long guns which are classified as "assault weapons" by SB 281. I also own one 9mm full-size semiautomatic handgun. Each of these firearms are designed for, and come standard with, detachable magazines which hold in excess of 10 rounds. I also own several AR-style lower receivers, which are likewise regulated under SB 281.
4. I plan on purchasing additional full-size semiautomatic handguns with standard detachable magazines holding in excess of ten rounds after October 1, 2013, if allowed to do so by law.
5. I plan on purchasing additional regulated long guns with standard detachable magazines holding in excess of ten rounds, and intend on assembling AR-15 style long guns for my own personal use, after October 1, 2013, if allowed to do so by law.
6. I currently use my regulated long guns for target practice, hunting and defense in my home.
7. I currently use my 9mm full-size semiautomatic handgun for target practice and defense in my home.
8. I suffer a partial paralysis of my right (dominant) hand caused by an injury to my right arm, which I suffered while on active duty in the United States Navy. As a result of this injury, it is difficult for me to operate quickly some types of firearms. Accordingly, I require


access to full-capacity magazines to fully utilize my firearms at the practice range, and to ensure my ability to defend myself in my home if necessary.

9. After October 1, 2013, I am advised that I will no longer be allowed either to purchase or acquire regulated long guns described as "assault weapons" in SB 281 in addition to those I currently own, or to purchase standard capacity magazines holding in excess of ten rounds for regulated firearms I may now own or may wish to purchase in the future, pursuant to SB 281.

10. The primary purpose for owning the firearms discussed herein is for self-defense in my home.

11. I do not possess any qualities or characteristics that would preclude me from owning any of the firearms discussed herein under federal law.

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



Andrew Turner

MARCH 7, 2014
Date