

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

CITY OF CLEVELAND)
601 Lakeside Avenue, Rm 106)
Cleveland, Ohio 44114-1077)
Plaintiff)

Judge: Timothy J. McGinty
CV07618492

vs.)

THE STATE OF OHIO)
c/o Ohio Attorney General Marc Dann)
30 East Broad Street, 17th Floor)
Columbus, Ohio 43215-3428)

and)

The National Rifle Association of America)
11250 Waples Mill Rd.)
Fairfax, Virginia 22030, *et al.*)

Defendant-Intervenor Applicants)

DECLARATION OF CHRIS W. COX

I am the Executive Director of the National Rifle Association of America's Institute for Legislative Action.

I am authorized to speak for and represent the National Rifle Association of America in litigation pursuant to Article X Section 1 of the bylaws of the National Rifle Association of America.

The National Rifle Association of America is a 501(c)(4) tax-exempt social welfare organization. Among its purposes and objectives are, "[t]o protect and defend the Constitution of the United States, especially with reference to the inalienable right of the individual American citizen guaranteed by such constitution to acquire, possess, transport, carry, transfer ownership of, and enjoy the right to use arms, in order that the people may always be in a position to exercise their legitimate individual rights of self-preservation and defense of family, person, and property, as well as to serve effectively in the appropriate militia for the common defense of the Republic and the individual liberty of its citizens."

National Rifle Association of America members have concealed handgun carry permits in all the states that now extend reciprocity to Ohio. In every one of those states there are firearm preemption laws that have no exceptions for disruptive "local rule".

National Rifle Association of America members living in Ohio, like other residents of Ohio, have reasonable expectations that their state laws regarding the expression of an individual constitutional right will not be abrogated by overreaching municipal bodies.

The National Rifle Association of America and its members support R.C. Sec. 9.68 so that the state legislature, rather than every town, village, and burg, has the sole ability to control state police powers that are clearly of general concern.

If Plaintiff succeeds in the above-captioned litigation, the state legislature will lose its authority to manage interstate relations of reciprocity, including the ability to prevent its own political subdivisions from causing irreparable harm to state police powers, thus protecting Ohio citizens in a uniform and rational fashion.

If Plaintiff succeeds in the above-captioned litigation, National Rifle Association of America members who live in the state of Ohio, and all states holding reciprocity with Ohio, could very well lose the ability to protect themselves and their families. In addition, they will be subject to uncertainty due to the threat of irrational local criminalization of otherwise lawful conduct, and abrogation of the will of the people of the entire state of Ohio by the actions of local officials.

If Plaintiff succeeds in the above-captioned litigation, the National Rifle Association of America will be harmed in its work towards promoting firearm safety, legitimate hunting and shooting activities and other programs that currently benefit the state of Ohio directly.

The National Rifle Association of America seeks to participate as Defendant-Intervenor in this action.

I declare under penalty of perjury and under the laws of the United States of America that the foregoing is true and correct.

Executed this 23 day of May 2007.

By: Chris W. Cox
Chris W. Cox
Executive Director, NRA Institute for Legislative Action

County/City of Jarvis
Commonwealth/State of Virginia
The foregoing instrument was subscribed and sworn before me this 23 day of May 2007, by Chris W. Cox
(name of person seeking acknowledgement)
Lisa L. Supernaugh
Notary Public
My commission expires: June 30, 2009



Embossed Hereon Is My
Commonwealth of Virginia Notary Public Seal
My Commission Expires June 30, 2009
LISA L. SUPERNAUGH