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**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

- 5 **(1) ROBERT DRAPER;**
- 6 **(2) ARIEL WEISBERG;**
- 7 **(3) DONNA MAJOR;**
- 8 **(4) ERIC NOTKIN;**
- 9 **(5) ROBERT BOUDRIE;**
- 10 **(6) BRENT CARLTON,**
- 11 *collectively, the*
- 12 **"CONSUMERS", and**
- 13 **(7) CONCORD ARMORY, LLC;**
- 14 **(8) PRECISION POINT FIREARMS, LLC;**
- 15 *collectively, the*
- 16 **"DEALERS", and**
- 17 **(9) SECOND AMENDMENT**
- 18 **FOUNDATION, INC.,**
- 19 **(10) COMMONWEALTH SECOND**
- 20 **AMENDMENT, INC.**

20 *collectively, the*  
21 **"ORGANIZATIONS", and**

22 Plaintiffs

23 v.

24 **MARTHA COAKLEY,**  
25 *in her official capacity as*  
26 **ATTORNEY GENERAL OF**  
27 **MASSACHUSETTS**

28 Defendant

Civil Action No.  
**1:14-CV-12471**

**DECLARATION OF  
COMMONWEALTH  
SECOND AMENDMENT**

**IN SUPPORT OF  
PLAINTIFFS' OPPOSITION  
TO THE DEFENDANT  
ATTORNEY GENERAL'S  
MOTION TO DISMISS**

1 I, **Thomas Bolioli**, am a Director of Commonwealth Second Amendment, Inc. I make  
2 this declaration in my capacity as plaintiff Comm2A's Director of Operations. I have personal  
3 knowledge of the matters set forth in this declaration, and as to those matters of which I do not  
4 have direct personal knowledge, I state them based on a good-faith belief based on other facts  
5 of which I do have direct personal knowledge. If called upon to do so, I would truthfully and  
6 competently testify regarding the contents of this declaration in a court of law.

7  
8 1. Comm2A was founded in 2009.

9 2. Comm2A is a tax-exempt Massachusetts-state non-profit corporation organized under  
10 §501(c)(3) of the IRS code.

11 3. Comm2A conducts research and provides training on state and federal firearms laws,  
12 including existing and proposed firearms laws and regulations in Massachusetts.

13 4. Comm2A hosts a number of invitation only law seminars on a semi-annual basis, at  
14 which legislative and judicial actions of the previous year are reviewed and strategies are  
15 discussed for the coming months.

16 5. At these seminars, Comm2A provides information to attorneys and other entities  
17 involved in public outreach and litigation directly relevant to the issues raised in this case,  
18 along with other issues directly related to civil rights and Second Amendment.

19 6. Comm2A funds these seminars from our coffers and provides all materials and expertise  
20 free of charge to the participants, all at a significant cost to Comm2A.

21 7. At a significant cost to itself, Comm2A provides relevant information to the public on the  
22 nature, scope and breadth of the Second Amendment, as well as relevant information on the  
23 status of various State and Federal laws affecting the free exercise of our supporter's rights.

24 8. Comm2A serves as a resource for authors of newspaper and magazine articles as well as  
25 television and radio programs dealing with various aspects of the right to keep and bear arms.

26 9. Over the last several years, Comm2A has itself, and in concert with the Washington-  
27 based Second Amendment Foundation, researched and analyzed the Massachusetts Handgun  
28 Sales Regulation (940 CMR 16.00, *et seq.*) that is at issue in this lawsuit.

1 10. Comm2A has been and is involved in legal action regarding the fundamental  
2 Constitutional right to the private ownership and possession of firearms.

3 A. Comm2A has sponsored multiple lawsuits in Massachusetts, all involving or  
4 related to the Second Amendment.

5 B. Comm2A is currently sponsoring four lawsuits in Federal Court within the  
6 District of Massachusetts, including the instant lawsuit, Draper, et al. v. Coakley.

7 11. Comm2A is not a membership-based organization but as of on or about the date of this  
8 Declaration , 835 donors, the vast majority being MA based or having significant connections to  
9 MA, have made substantive donations averaging about \$166 dollars each.

10 12. Many Comm2A supporters have contacted Comm2A within the past few years  
11 specifically regarding the Massachusetts Handgun Sales Regulation that is at issue in this  
12 lawsuit.

13 13. Many of Comm2A's supporters have asked Comm2A to take legal action to challenge the  
14 constitutionality of the Massachusetts Handgun Sales Regulation because as firearms dealers  
15 they cannot determine whether they may sell or transfer Gen3/4 Glock pistols to  
16 Massachusetts residents, or as Massachusetts residents want to but cannot purchase Gen3/4  
17 Glock pistols because of Massachusetts firearms dealers' inability to determine whether and  
18 why or why not such pistols comply or do not comply with the Massachusetts Handgun Sales  
19 Regulation.

20  
21 I declare under penalty of perjury under the laws of the Commonwealth of  
22 Massachusetts that the foregoing is true and correct to the best of my knowledge.

23  
24 9/17/14

25 \_\_\_\_\_  
Date



26 \_\_\_\_\_  
Thomas Bolioli.  
Commonwealth Second Amendment, Inc.