

# EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

KRISTIN WORTH, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil No. 21-1348
	)	
JOHN HARRINGTON, in his	)	Judge Katherine M. Menendez
individual capacity and in his	)	Magistrate Judge Leo I. Brisbois
official capacity as Commissioner	)	
of the Minnesota Department of	)	
Public Safety <i>et al.</i> ,	)	
	)	
Defendants.	)	

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**Declaration of Brandon Combs**

I, Brandon Combs, make the following declaration pursuant to 28 U.S.C. § 1746:

1. I am a citizen of Nevada and over eighteen years of age. My statements herein are based on personal knowledge and experience.
2. I am the President of Firearms Policy Coalition, Inc. I have held this position since 2014. In this capacity, I have access to, and personal knowledge of, FPC's membership information and practices.
3. FPC is a nonprofit organization incorporated under the laws of Delaware with its principal place of business in Clark County, Nevada. FPC seeks to defend and promote the People's rights—including the right to keep and bear arms—advance individual liberty, and restore freedom. FPC serves its members and the public through legislative advocacy, litigation and legal efforts, research, education, outreach, and other programs.

4. FPC has members both over and under the age of twenty-one. FPC has thousands of members throughout the United States, some of whom reside in Minnesota.
5. Plaintiffs Worth, Dye, and Anderson are members of FPC.
6. FPC brings this action as a public interest organization on behalf of its individual members in Minnesota between eighteen and twenty-one, who would exercise their right to bear arms and acquire carry licenses if it were not for the laws at issue in this case.
7. The injuries suffered by these members are germane to the core purposes of FPC.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.

Executed on August 2, 2022

A handwritten signature in black ink, appearing to read 'Brandon Combs', is written over a horizontal line.

Brandon Combs