

# **Exhibit 1**

## SUPPLEMENTAL DECLARATION OF MICHAELA DUNNE

I, Michaela Dunne, depose and state based on my personal knowledge:

1. I am presently the Deputy Commissioner of the Massachusetts Department of Criminal Justice Information Services ("DCJIS"), a division of the Executive Office of Public Safety and Security ("EOPSS").
2. I provided a prior sworn Declaration in this matter dated April 21, 2020, which was filed with Defendants' Opposition on April 28, 2020. (Doc. No. 61-1). This Declaration is intended to supplement that sworn statement with additional information.
3. I made the following statement in my prior Affidavit at paragraph 20:

Nothing in the Governor's Covid-19 emergency orders prevents a person who wishes to purchase a firearm from purchasing it in a legal private sale from another firearm owner, provided the private seller complies with the laws governing private transfers, including the registration requirement. DCJIS publishes information about private transfers at:

[https://mircs.chs.state.ma.us/fa10/action/home?app\\_context=home&app\\_action=presentHome](https://mircs.chs.state.ma.us/fa10/action/home?app_context=home&app_action=presentHome).

4. I understand that Plaintiffs say in connection with their reply papers that buying a gun in a private sale is not a realistic option because they don't know anyone offering a gun for sale.
5. It is my experience that it is easy to find advertisements of guns available for private sale in Massachusetts on the Internet. The websites available for identifying private sales include:
  - Armslist Marketplace: <https://www.armslist.com/>
  - Northeast Shooters Classified Ads: <https://www.northeastshooters.com/xen/forums/firearm-classifieds.16/>
  - GunBroker.com: <https://www.gunbroker.com/>

Each of these websites is sortable in order to find guns being offered for private sale in Massachusetts.

6. For illustrative purposes, I have attached one recent advertisement for a Massachusetts private sale of a weapon to this Supplemental Declaration. On my review, there were many other similar advertisements that were posted since the Emergency Orders have been in effect.

7. Based on transaction information that DCJIS maintains in its database, there were at least 2,179 private sales of weapons in Massachusetts during the month of April, 2020, while the Emergency Orders have been in effect. This number reflects private transactions between two Massachusetts licensed individuals.
8. Also based on transaction information that DCJIS maintains in its database, there were at least 985 registrations of firearms in Massachusetts during the month of April, 2020, while the Emergency Orders have been in effect. This number reflects the registration of firearms by a Massachusetts licensed individual for reasons such as a firearm purchased out of state or recently built firearms.
9. Some of the Plaintiffs have continued to complete firearms sales and transactions during April and May 2020.
10. The records available in the Massachusetts Instant Record Check System (MIRCS) maintained by DCJIS reflect that for the time period of March 29, 2020 through May 1, 2020, the Plaintiffs have submitted the following transactions:

SHOP NAME	SALES	LAST SALE DATE
ARMOUR SPORTS INC	34	04/29/20
BACHANT ARMAMENTS CORP	8	05/01/20
DEMALIA FIREARMS & TRAINING	18	04/28/20
DOWNRANGE INC	86	04/27/20
J&J ARMS LLC	8	04/01/20
PRECISION POINT FIREARMS OF WOBURN	56	05/01/20
SHAW SHEEN FIREARMS & GUNSMITHING	13	04/26/20
SHOOTING SUPPLY	47	04/02/20
<b>TOTAL</b>	<b>272</b>	

Signed under the pains and penalties of perjury,



\_\_\_\_\_  
 Michaela Dunne  
 Deputy Commissioner  
 Department of Criminal Justice Information Services  
 Executive Office of Public Safety and Security

05/02/2020

\_\_\_\_\_  
 DATE

# WTS High Standard Sentinel Revolver \$250

Wolf99 · Apr 26, 2020



**Wolf99**

NES Member

Rating - 100%

25 0 0

Joined: Jun 21, 2006

Messages: 627

Likes: 81

Location:  
Between the Rock  
and Bridge, MA

Today at 10:08 AM

#1/1

Location: Plymouth, Ma

Description: High Standard R-103. 9 shot, .22 caliber revolver. Has the Plastic factory grips, good pinker double action. No box or manual.

Selling Terms: Cash Only, no shipping. EFA10  
Goose Rules Apply-All Federal and State Laws followed.

Price: \$250.00

Contact Info: Direct message.

## Attachments



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641.6 KB Views: 7



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