

# EXHIBIT C

**VIRGINIA:**

**IN THE CIRCUIT COURT FOR THE CITY OF LYNCHBURG**

**RAUL WILSON,**

**WYATT LOWMAN,**

**VIRGINIA CITIZENS DEFENSE LEAGUE,**

**GUN OWNERS OF AMERICA, INC.,**

**and**

**GUN OWNERS FOUNDATION,**

**Plaintiffs,**

**v.**

**Case No. CL20-582-01**

**COLONEL JEFFREY S. KATZ  
(In his Official Capacity as  
Superintendent of the Virginia State Police)<sup>1</sup>**

**Defendant.**

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<sup>1</sup> Jeffrey S. Katz was appointed Superintendent of the Virginia State Police in January of 2026. By automatic operation of Va. Code § 8.01-17(B), Col. Katz is now the Defendant in his official capacity.

## DECLARATION OF PATRICIA WEBB

I, Patricia Webb, declare under penalty of perjury that the following is true and correct.

1. I am a U.S. citizen and resident of Hanover County, Virginia. I make this declaration in support of Plaintiffs' Motion for a Rule to Show Cause. If called as a witness, I can testify to the truth of the statements contained therein.

2. I am the Secretary and Treasurer of Virginia Citizens Defense League, a Plaintiff in this lawsuit.

3. I am also a federal firearms licensee, licensed to engage in the business of dealing in firearms under both federal and Virginia law, and a registered user of the Virginia State Police "VCheck" system used by dealers for conducting background checks for commercial firearms sales. As a registered VCheck dealer, I receive notices by email from the Virginia State Police Firearms Transaction Center regarding the status and operations of the VCheck system, and related matters.

4. On October 31, 2025, I (presumably together with all Virginia FFLs) received the following notice, by email, from the Virginia State Police Firearms Transaction Center:

\*\*\*Effective immediately \*\*\*\* Private Sale Background Checks No Longer Available / Required

In compliance with the injunction and final order entered by the Circuit Court for the City of Lynchburg in Raul Wilson, Wyatt Lowman, Virginia Citizens Defense League, Gun Owners of America, Inc, and Gun Owners Foundation v. Colonel Matther D. Hanley, CL25000582-00, October 29, 2025, "[t]he Virginia Department of State Police, and all law enforcement divisions, agencies, and officers within the Commonwealth, to include their successors or replacements in office, are hereby permanently enjoined and prohibited from administering; enforcing, or otherwise imposing upon any person the requirements of, the Act (Va. Code § 18.2-308.2:5)."

The Order prohibits the State Police from running, or assisting in the running, of private sale background checks pursuant to the provisions of § 18.2-308.2:5.

Virginia law currently does not require, and VSP will not provide, criminal history background checks for the private sale of firearms.

As of 3pm today, the radio button that allows Dealers to mark a transaction as PRIVATE SALE will be DISABLED.

5. On April 25, 2026, I emailed the following inquiry to the Virginia State Police Firearms Transaction Center: “I’m requesting guidance on the Emergency Enactment Clause placed on HB1525 by Governor Spanberger. Are private sale background checks required by law, or is the permanent injunction still in effect?”

6. The same day, VSP responded that “The VSP is not currently in a position to run these background checks.”

7. On the afternoon of May 27, 2026, I began a background check for a customer through the VSP’s VCheck portal. As I navigated the system, a notice popped up on the screen. It said “Attention: Private sale background checks are now available.” And whereas the toggle switch for private sales had previously been disabled following this Court’s October 2025 Order, it was now enabled.

8. Contemporaneously with this discovery, VCDL began to receive communications from its members and other firearm dealers throughout the commonwealth. These persons reported receiving an email from “firearms@vsp.virginia.gov” that contained a single sentence: **“Private sale background checks are now available.”**

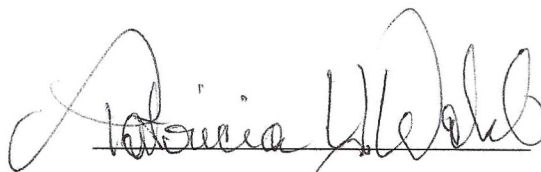
9. At 5:27PM on May 27, 2026, I emailed the VSP Firearms Transaction Center, with the following inquiry: “Yesterday the private sale background check feature on the eForm SP-65 was greyed out and not working. Today there is a notice on the VCHECK Dealer Portal saying that private sale background checks are available. Please advise the status, and if you are now considering them to be mandatory.”

10. At 6:20PM, I received the following response: "The Private Sales button is enabled in VCheck. Dealers and customers should follow Virginia law with respect to Private Sales and performing background checks."

In accordance with Va. Code § 8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

05/28/2026

DATE

A handwritten signature in cursive script, appearing to read "Patricia Webb", written over a horizontal line.

PATRICIA WEBB