



*State of New Jersey*

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August 8, 2018

**Via ECF**

Hon. Peter G. Sheridan, U.S.D.J.  
Clarkson S. Fisher Building &  
U.S. Courthouse, Room 4050  
402 East State Street  
Trenton, New Jersey 08608

**Re: Ass'n of N.J. Rifle & Pistol Clubs, Inc. et al. v.  
Grewal et al.  
Civil Action No. 18-10507 (PGS) (LHG)**

Dear Judge Sheridan:

As discussed during yesterday's conference call, attached please find the Supplemental Declaration of Glenn Stanton that was previously served on Plaintiffs' counsel. Thank you for your consideration.

Respectfully,

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Stuart Feinblatt  
Stuart M. Feinblatt  
Assistant Attorney General

cc: All counsel (via ECF)



**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
TRENTON VICINAGE**

ASSOCIATION OF NEW JERSEY  
RIFLE & PISTOL CLUBS, INC.,  
BLAKE ELLMAN, and ALEXANDER  
DEMBOWSKI,

Plaintiffs,

v.

GURBIR GREWAL, in his official  
capacity as Attorney General of New  
Jersey, PATRICK J. CALLAHAN, in  
his official capacity as Superintendent  
of the New Jersey Division of State  
Police, THOMAS WILLIVER, in his  
official capacity as Chief of Police of  
the Chester Police Department, and  
JAMES B. O'CONNOR, in his official  
capacity as Chief of Police of the  
Lyndhurst Police Department,

Defendants.

Hon. Peter G. Sheridan, U.S.D.J.  
Hon. Lois H. Goodman, U.S.M.J.

Docket No. 3:18-cv-10507-PGS-LHG

**SUPPLEMENTAL DECLARATION  
OF GLENN STANTON**

I, Glenn Stanton, am competent to state, and declare the following, based on my personal knowledge:

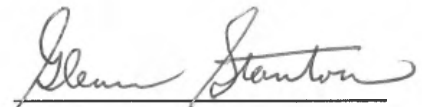
1. I am a citizen of the United States and a resident of New Jersey.
2. I am over 21 years of age.
3. I am the State Range Master for the New Jersey Office of the Attorney General Division of Criminal Justice and have been so employed since 2013.

4. I have experience training with and teaching both United States and foreign military units.
5. Specifically, from 1996 until 1998, I trained with the Seal Team 1 at Fort Indiantown Gap in Pennsylvania in the use of firearms. From 1992 until 2000, I trained with the United States Air Force 102<sup>nd</sup> parajumpers based out of Long Island, New York, in the use of pistols. Similarly, from 1995 through 1998, I trained with the United States Coast Guard in Long Beach Island, New Jersey, in pistol training.
6. In 1998, I taught a Law Enforcement Sniper School to the Canadian Forces Sniper Group deploying to Bosnia for a United Nations peacekeeping mission at the Canadian Forces Base in Medford, Ontario.
7. I also conducted a pistol and shotgun course in 2003 for a United States Army Military Police detachment at Fort Dix, New Jersey, prior to their deployment to Iraq.
8. Based on my experience observing and training new recruits in the police academy, specifically, individuals with little to no experience with semi-automatic firearms, it can take anywhere from 8 to 10 seconds for an inexperienced shooter to change a magazine.
9. I have been qualified as a firearms expert three times in the Federal District Court in New York, Eastern and Southern.

10. I believe it would not be feasible and cost prohibitive to attempt to have all interested New Jersey citizens trained on LCMs in a matter consistent with law enforcement officers.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: August 3, 2018

  
Glenn Stanton