

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF LANCASTER

**JOHN CRUMP,
GUN OWNERS OF AMERICA, INC.,
GUN OWNERS FOUNDATION,
VIRGINIA CITIZENS DEFENSE LEAGUE, and
VIRGINIA CITIZENS DEFENSE FOUNDATION,**

Plaintiffs,

v.

Case No. CL26000201-00

**COLONEL JEFFREY S. KATZ,
In His Official Capacity as
Superintendent of the Virginia State Police
7700 Midlothian Turnpike
North Chesterfield, VA 23235,**

Defendant.

**PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

COME NOW Plaintiffs, by counsel, pursuant to Rules 3:26 and 4:15 of the Rules of the Supreme Court of Virginia, and, for the reasons stated in Plaintiffs' accompanying Memorandum in Support, move this Court for a temporary restraining order and preliminary injunction against enforcement of:

- (i)** Va. Code § 18.2-308.2:2(F)(4)(1)-(7) (defining "assault firearms");
- (ii)** Va. Code § 18.2-287.4:1 (prohibiting the import, sale, manufacture, purchase, or transfer of so-called "assault firearms");
- (iii)** the associated penalties and derivative crimes contained in Va. Code §§ 18.2-308.09(1), 18.2-308.1:9, 18.2-308.2:1, 18.2-308.2:2(A), and 18.2-308.2:3;

- (iv) Va. Code § 18.2-308.2:5(E) (duplicatively prohibiting the willful and intentional purchase and sale of “assault firearms” in exchange for anything of value);
- (v) Va. Code § 18.2-287.4 (prohibiting the public carry of “assault firearms”);
- (vi) Va. Code § 18.2-309.1 (defining, and prohibiting the import, sale, barter, transfer, or purchase of “large capacity ammunition feeding devices”); and
- (vii) Va. Code § 19.2-386.28 (providing for the forfeiture of prohibited “assault firearms” and “large capacity ammunition feeding devices”).

Plaintiffs further request that no bond be required given that the injunction sought seeks only equitable relief in the form of enjoining enforcement of unconstitutional statutes, and Defendant will not suffer any monetary harm.

Respectfully submitted,

**JOHN CRUMP,
GUN OWNERS OF AMERICA, INC.,
GUN OWNERS FOUNDATION,
VIRGINIA CITIZENS DEFENSE LEAGUE, and
VIRGINIA CITIZENS DEFENSE FOUNDATION**

BY:



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CERTIFICATE OF SERVICE

In accordance with Va. Code § 8.01-629, the undersigned certifies that, on May 18, 2026, a true and accurate copy of the foregoing Memorandum in Support of Motion for Temporary Restraining Order and Preliminary Injunction was emailed to the following:

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