No. 26-1435

IN THE

# Supreme Court of the United States

P.G. WODEHOUSE,

Petitioner,

v.

ALISTER MACKENZIE, IN HIS OFFICIAL CAPACITY AS CHIEF OF POLICE FOR AMES CITY

Respondent.

On Writ of Certiorari to the
United States Court of Appeals for the Ames Circuit

## JOINT APPENDIX

*Joseph N. Posimato '17 & William V. Bergstrom '17*

# TABLE OF CONTENTS


| | |
|---|---|
| **Excerpt from Supreme Court Order List** | **JA-2** |
| **Court of Appeals Opinion** | **JA-3** |
| **District Court Opinion** | **JA-14** |
| **District Court Order** | **JA-16** |
| **Complaint** | **JA-17** |
| **Excerpt from Ames State Regulatory Code** | **JA-23** |
| **Motion for Preliminary Injunction** | **JA-24** |
| **Wodehouse Declaration** | **JA-27** |
| **Daniels Declaration** | **JA-30** |

(ORDER LIST: 610 U.S.)

**MONDAY, JUNE 29, 2026**

**CERTIORARI GRANTED**

26-1435 P.G. WODEHOUSE v. ALISTER MACKENZIE

The petition for a writ of certiorari is granted on the following two questions:[1]

1. Whether the Ames Circuit erred in rejecting Petitioner's challenge to a law that bans carrying firearms in Fairview Park during any permitted event.

2. Whether the Ames Circuit erred in prioritizing historical evidence from the period immediately surrounding the ratification of the Fourteenth Amendment in assessing the scope of the Second Amendment right.

[1] The parties may rephrase the Questions Presented how they wish and treat them in the order they see fit. The parties should not address issues substantially outside those mentioned in this order, but they are not confined to the arguments raised before the district court or appellate court.

**FOR PUBLICATION**

# UNITED STATES COURT OF APPEALS
# FOR THE AMES CIRCUIT

| | |
|---|---|
| P.G. WODEHOUSE,<br><br>*Plaintiff-Appellant*<br><br>v.<br><br>ALISTER MACKENZIE, in his official capacity as Chief of Police for Ames City,<br><br>*Defendant-Appellee*. | Case No. 25-3464 |

Appeal from the United States District Court for the District of Ames, Charlie Leclerc, District Judge, Presiding

Argued and Submitted February 12, 2026
Ames City, Ames

Filed April 27, 2026

Before Scheffler, Chief Judge, and Fleetwood and S.W. Kim, Circuit Judges.

Scheffler, C.J.:

Fairview Park occupies 844 acres in the center of Ames City. Home to 22 children's playgrounds, 6.2 miles of drives, two outdoor theaters, the Ames City Zoo and too many other attractions to name, it is the largest and busiest park in the state of Ames, if not the country. It plays host to tens of millions of visitors annually, and on a summer weekend there are often in excess of a quarter of a million people recreating across the park's sprawling acreage.

Never is Fairview Park busier, however, than during the many large gatherings that fill its green spaces with civically engaged citizens of all stripes throughout the spring, summer, and autumn. The Supreme Court has stated that parks, from "time out of mind, have been used for purposes of assembly, communicating thoughts between citizens, and discussing public questions," *Hague v. Comm. for Indus. Org.*, 307 U.S. 496, 515 (1939), and Fairview is no exception. The Ames Women's March, Ames March for Life, and Ames Pride events last year each boasted over half a million attendees filling the largest open spaces in the park.

With large gatherings, however, come security concerns. Conscious of the ever-looming specter of a mass shooting or politically motivated terrorist attack, Ames City's police force dedicates extra

manpower to the park during the busy summer months and makes a point to have visible officers in uniform in and around the park during larger permitted events. And recently, the Ames State legislature has taken steps to head off a tragedy as well.

Following the Supreme Court's decision in *New York State Rifle & Pistol Association v. Bruen*, 597 U.S. 1 (2022), Ames, like New York and several other states that had previously only sparingly granted permits to carry firearms in public, found itself forced to grant more licenses to carry ("LTC") than ever before. The Ames Legislature swung into action, enacting a litany of locational restrictions on firearms carriage, including in museums, government buildings, bars and restaurants with the ability to serve liquor, and, as relevant here, in any public park that is hosting a permitted event.

Plaintiff P.G. Wodehouse filed the instant action to challenge this latter restriction. Wodehouse is a resident of Ames City, a holder of an LTC that permits him to carry a handgun concealed upon his person under Ames law, and a member of the Ames Buffalo Soldiers MC, a motorcycle club named after the historically African American regiments of the United States Army. Unlike the "biker gangs" of movies, the Ames Buffalo Soldiers MC is a service club whose

members, in addition to owning and enjoying motorcycles, participate in many charitable activities throughout the state of Ames. Among other activities, Wodehouse and his fellow club members frequently volunteer to provide security at political events and rallies, especially those that aim to highlight the issues of racism, discrimination, or racial inequality in the United States.

Wodehouse has, however, declined to attend or provide security at any events at Fairview Park since the "park event" restriction went into place, noting that he does not feel comfortable providing security where he cannot carry a firearm with which to defend himself or the other attendees at the event.

He filed a pre-enforcement challenge in the District of Ames and sought a preliminary injunction against the park event restriction's enforcement. The district court sidestepped the merits and held that the other preliminary injunction factors—the public interest, the balance of the equities, and irreparable harm—all favored the State. Wodehouse timely appealed. We have jurisdiction under 28 U.S.C. § 1292(a)(1).

## STANDARD OF REVIEW

We review the denial of a preliminary injunction for abuse of discretion, but we review the underlying legal issues *de novo*.

## ANALYSIS

At the outset, we must make clear that we believe the district court erred in choosing to sidestep the merits. While technically independent considerations, courts have repeatedly cautioned that in cases involving an allegation of a violation of constitutional rights, the other preliminary injunction factors will be influenced by the Court's determination of whether or not a constitutional violation is likely to be proven. *See, e.g.*, *Opulent Life Church v. City of Holly Springs*, 697 F.3d 279, 295 (5th Cir. 2012) ("When an alleged deprivation of a constitutional right is involved, most courts hold that no further showing of irreparable injury is necessary." (citation omitted)). We therefore begin with the merits of Wodehouse's Second Amendment challenge. Because we conclude that he is not likely to succeed on the merits, we end our analysis there as well.

### I. The Plain Text of the Second Amendment Protects the Right to Carry Firearms in Public.

The Second Amendment states: "A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed." U.S. CONST. amend. II. To assess whether a law infringes that right, the Supreme Court has prescribed a two-part test. First, courts ask whether the law regulates

conduct falling within the scope of the Amendment's "plain text." *Bruen*, 597 U.S. at 24. Second, if a law does restrict conduct covered by the "plain text," it is presumptively—but only presumptively—unconstitutional. *Id.* The law may still pass muster if it can be shown to be "consistent with the Nation's historical tradition of firearm regulation." *Id.*

Here, we have little difficulty concluding that the "plain text" protects Wodehouse's right to carry his handgun, as a holder of a valid LTC, at events held in Fairview Park. *Bruen* itself held that "[t]he Second Amendment guaranteed to 'all Americans' the right to bear commonly used arms in public subject to certain reasonable, well-defined restrictions." *Id.* at 70. Whether this restriction is one of the reasonable and well-defined ones, we take to be an issue for history.

## II. Ames's Park Event Restriction Fits Comfortably Within the "Sensitive Places" Exception to the Second Amendment.

At *Bruen*'s second step, we ask whether similar restrictions existed at earlier points in our history such that we can conclude that the park event restriction "is consistent with the principles that underpin our regulatory tradition." *United States v. Rahimi*, 602 U.S. 680, 692 (2024).

We begin our analysis with *District of Columbia v. Heller*, 554 U.S. 570 (2008). In that case, the Supreme Court concluded that the Second Amendment protects an individual right to bear arms, but sounded a cautionary note against the worries that this would lead to the undoing of all manner of laws regulating guns, explaining that "nothing in our opinion should be taken to cast doubt on longstanding prohibitions on the possession of firearms by felons and the mentally ill, or laws forbidding the carrying of firearms *in sensitive places such as schools and government buildings*, or laws imposing conditions or qualifications on the commercial sale of arms." *Id.* at 626–27 (emphasis added).

In *Bruen*, the Supreme Court again discussed these "sensitive place" restrictions. There, it explained its mode of historical analysis by pointing to this tradition and explaining we "can assume it settled that [certain] locations were 'sensitive places' where arms carrying could be prohibited consistent with the Second Amendment" and that "courts can use analogies to those historical regulations of 'sensitive places' to determine that modern regulations prohibiting the carry of firearms in *new* and analogous sensitive places are constitutionally permissible." *Bruen*, 597 U.S. at 30. So that is our task.

Here, we find several possible historical threads that could support the park events restriction. First, there is the tradition of restricting firearms in often-crowded public forums. *See Antonyuk v. James*, 120 F.4th 941, 1021 (2d Cir. 2024). With its roots dating back to the Statute of Northampton in 1328, the restrictions on carrying firearms at park events are perhaps most similar to the laws from the latter half of the 19th century that prohibited carrying firearms in places where people had assembled for "educational, literary or scientific purposes, or into a ball room, social party or other social gathering." 1870 Tex. Gen. Laws 63, ch. 46; *see also Antonyuk*, 120 F.4th at 1020 (discussing the same). Such laws serve the same purpose of advancing the freedoms protected by the First Amendment by shielding them from the chilling effect that can accompany the presence of weapons. These laws are bolstered by the tradition of regulating assemblies that threaten the public peace. *See Kipke v. Moore*, 165 F.4th 194, 213 (4th Cir. 2026).

Second, there is the tradition of restricting firearms at parks themselves. While there have, of course, long been communal green spaces in American cities, the notion of "public parks" of the sort we know today "did not emerge until after the onset of mass urbanization

and were developed to provide a reprieve from industrialization and foster democratic solidarity across social classes." *Koons v. Att'y Gen. N.J.*, 156 F.4th 210, 256 (3d Cir. 2025), *reh'g en banc granted, op. vacated*, 162 F.4th 100 (mem.). The first and most famous park was Central Park, designed by Frederick Law Olmsted and opened in 1858, which immediately banned firearms. *Wolford v. Lopez*, 116 F.4th 959, 982 (9th Cir. 2024), *cert. granted in part*, 146 S. Ct. 79 (2025) (mem.). Many others did the same. *Id.* This is close to a "dead ringer" for the parks event restriction today, except that the parks event restriction is a more limited prohibition, since it applies only while permitted events are occurring in the parks. We cannot conclude that a restriction that covers *less* conduct than historical rules would run afoul of the Second Amendment.

Wodehouse criticizes these lines of historical reasoning, noting especially that the most analogous of the crowded public assembly restrictions and essentially all of the historical parks restrictions date not to the Founding or the Second Amendment's ratification in 1791, but to the latter half of the 19th century. That makes them, he argues, too late in time to inform our understanding of the historically accepted scope of the right. *See Lara v. Comm'r Pa. State Police*, 125 F.4th 428,

438–40 (3d Cir. 2025). With respect to our colleagues on the Third Circuit, we disagree. The Supreme Court has several times declined to decide this precise question while noting an "ongoing scholarly debate on whether courts should primarily rely on the prevailing understanding of an individual right when the Fourteenth Amendment was ratified in 1868 when defining its scope." *Bruen*, 597 U.S. at 37–38. Rather, we think that both are ordinarily touchstones of the analysis and when there is a conflict (as Wodehouse appears to argue there is here), it is entirely sensible that the understanding of the right at the time it actually became effective against the States should be the one that controls. That is especially true here given *Bruen*'s warning that "unprecedented societal concerns or dramatic technological changes may require a more nuanced approach" to historical analysis. *Id.* at 27. This is undoubtedly such a case—the problem posed by mass shootings is a distinctly modern one, and in surveying the historical record we find it considerably easier to analogize that problem, and the parks event restriction, onto the world and regulations that existed in and around the Fourteenth Amendment's ratification in 1868. We therefore hold that in a case like this one, it is appropriate to prioritize Reconstruction-era history in defining the contours of the Second Amendment right.

## CONCLUSION

The upshot of all of this is simple. The parks restriction accords with traditional firearm regulations in this country, and Wodehouse is unlikely to succeed on the merits of his suit. The district court's succinct analysis of the remaining injunction factors is sound, and we therefore **AFFIRM** the district court's order denying a preliminary injunction, and **REMAND** for further proceedings consistent with this opinion.

**UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF AMES**

| | |
|---|---|
| P.G. WODEHOUSE,<br><br>*Plaintiff*,<br><br>v.<br><br>ALISTER MACKENZIE,<br><br>*Defendant.* | Docket No. 1:24-cv-00183-CL |

## OPINION

Plaintiff P.G. Wodehouse seeks to enjoin enforcement of an Ames state law that makes it unlawful to carry a firearm in Fairview Park in the City of Ames during the time when a permitted event is taking place in the park.

"A preliminary injunction is an extraordinary remedy never awarded as of right." *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 24 (2008). "A plaintiff seeking a preliminary injunction must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of the equities tips in his favor, and that an injunction is in the public interest." *Id.* at 20.

Here, the parties spend the bulk of their briefs arguing over the first factor, likelihood of success on the merits. But it is unnecessary to consider those weighty

and complex issues because Plaintiff has failed to substantiate the other three elements of the *Winter* test. The primary purpose of a preliminary injunction is simply "to keep cases alive until trial." *Del. State Sportsmen's Ass'n v. Del. Dep't of Safety & Homeland Sec.*, 108 F.4th 194, 201 (3d Cir. 2024). Here, considered in that light, there is no risk that this case will not survive to trial—Mr. Wodehouse alleges an ongoing desire to carry a firearm at public events in Fairview Park, and he will still desire to do that when trial eventually comes. In the meantime, the burden on the defendant and the harm to the public of enjoining a duly enacted state law, especially one with such laudable safety goals, are severe. Accordingly, the motion for a preliminary injunction is denied.

An appropriate order will enter.

Dated: June 5, 2025

/s/ Charlie Leclerc
UNITED STATES DISTRICT JUDGE

**UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF AMES**

| | |
|---|---|
| P.G. WODEHOUSE,<br><br>*Plaintiff*,<br><br>v.<br><br>ALISTER MACKENZIE *in his official capacity as Chief of Police for Ames City,*<br><br>*Defendant.* | Docket No. 1:24-cv-00183-CL |

**ORDER**

For the reasons set forth in the accompanying Opinion, the Court **DENIES** Plaintiff's Motion for a Preliminary Injunction (Doc. 16).

IT IS SO ORDERED.

Dated: June 5, 2025

/s/ Charlie Leclerc
UNITED STATES DISTRICT JUDGE

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF AMES**

| | |
|---|---|
| P.G. Wodehouse,<br><br>*Plaintiff*,<br><br>v.<br><br>Alister MacKenzie, *in his official capacity as Chief of Police for Ames City*,<br><br>*Defendant.* | Civil Case No. _____<br><br>**COMPLAINT** |

Plaintiff P.G. Wodehouse, through the undersigned counsel, alleges as follows against Alister MacKenzie, in his official capacity as Chief of Police for Ames City:

**INTRODUCTION**

1. The Second Amendment provides, "A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed." U.S. Const. amend. II.

2. Ignoring this right, Ames State passed a law barring any individual from carrying a firearm "within a public park during any Permitted Event," which the State

defines as any event requiring a permit because its attendance will exceed 1,000 people. Ames State Regulatory Code §§ 1-101, 1-102 (the "Permitted Event Restriction").

3. The State's Permitted Event Restriction prevents P.G. Wodehouse from exercising his right to carry a firearm. And it does so by means that lack any sufficiently close historical analogue from the Founding. It must therefore be enjoined.

**PARTIES**

4. Plaintiff P.G. Wodehouse is a resident of Ames City.

5. Defendant Alister MacKenzie is the Chief of the Ames City Police. He is charged with enforcing Ames Law within Ames City, including the "Permitted Event Restriction."

**ALLEGATIONS**

6. P.G. Wodehouse is a pillar of the Ames City community. After graduating from Ames High School as his class salutatorian, Wodehouse decided to eschew higher

education in favor of public service. He found his calling in the Ames City Police Department, where he honorably served for twenty years, first as a line officer and then as head of the Department's detective function.[2]

7. While Wodehouse decided to retire from the Department in 2020, it proved more difficult for him to let go of his policeman's oath to serve and protect the Ames City community.

8. Finding himself with time on his hands, Wodehouse fell in with the Ames Buffalo Soldiers Motorcycle Club – a service club that attracts motorcycle hobbyists with a penchant for participating in charitable activities throughout Ames state.

9. For Wodehouse in particular, the Club has allowed him to regularly serve as volunteer security at political events and rallies in Ames City. Wodehouse and his fellow club members make special time to offer their

[2] For more on Wodehouse's illustrious detective career, see "Stranger than Fiction: How One Man Cracked the Case of the Missing Jewels at Blandings Castle."

protection to community events focused on racism, discrimination, and racial inequality. In this capacity, Wodehouse carries a firearm pursuant to his validly issued License to Carry permit, to aid in the defense of himself and the participants attending the events for which he provides security.

10. For years, Wodehouse served as volunteer security for events at Fairview Park – Ames City's largest and most popular park. But in 2023 the State enacted the Permitted Event Restriction, which made it impossible for Wodehouse to continue carrying a firearm while volunteering as a security guard at permitted events hosted in the Park.

11. Since the law has come into effect, Wodehouse has not attended or provided security at any permitted events in Fairview Park, since he does not feel safe or comfortable providing security in circumstances where he cannot carry a firearm to defend himself and others.

**COUNT ONE**
***Violation of the Second and Fourteenth Amendments***
***42 U.S.C. § 1983***

12. Plaintiff realleges every allegation set forth in the preceding paragraphs as if fully stated herein.

13. The Second Amendment forbids the State of Ames to deny Wodehouse the right to bear arms through the Permitted Event Restriction.

14. To assess whether a law infringes the right to bear arms, the Supreme Court has adopted a two-part test: First, courts must ask whether the law regulates conduct falling within the scope of the Amendment's "plain text." *N.Y. State Rifle & Pistol Ass'n v. Bruen*, 597 U.S. 1, 24 (2022). Second, if a law does restrict conduct covered by the "plain text," it is presumptively unconstitutional unless it can be shown to be "consistent with the Nation's historical tradition of firearm regulation." *Id.*

15. The State's firearm restriction flunks this test. There is no doubt that it regulates conduct within the scope of the Second Amendment, as it prohibits individuals from bearing arms. And the City will not be able to meet its burden of demonstrating an historical tradition of firearm regulation analogous to the

Permitted Event Restriction. To the contrary, the historical evidence speaks in the opposite direction.

16. Accordingly, the law is unconstitutional.

**WHEREFORE**, Plaintiff requests the following relief:

* Declaratory and injunctive relief declaring the State's law unconstitutional and enjoining its enforcement; and

* Granting any other relief which this Court deems appropriate.

Dated: June 7, 2024

Respectfully submitted,

*/s/ Ron Psmith*
Ron Psmith, #67924
Plaintiff's Attorney

# Ames State Regulatory Code

Enacted: February 2023

## § 1-101 Definitions

"Permitted Event" shall refer to any public event requiring a permit because its attendance will exceed 1,000 people.

## § 1-102 Firearm Restrictions

It shall be unlawful for any person, excluding on-duty police officers, to carry a firearm within the bounds of any public park during any Permitted Event.

## § 1-103 Penalty

Violations of Section 1-102 of the Ames State Regulatory Code are subject to a fine of not more than $5,000 and/or imprisonment not to exceed 364 days.

**UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF AMES**

| | |
|---|---|
| P.G. WODEHOUSE,<br><br>*Plaintiff*,<br><br>v.<br><br>ALISTER MACKENZIE, *in his official capacity as Chief of Ames City Police*,<br><br>*Defendant.* | Docket No. 1:24-cv-00183-CL |

## Plaintiff's Motion for Preliminary Injunction

Plaintiff P.G. Wodehouse seeks a preliminary injunction enjoining Defendant from enforcing Section 1-102 of the Ames State Regulatory Code, which prohibits individuals like Plaintiff from possessing a firearm inside the bounds of a public park during a permitted event.

"A preliminary injunction is an extraordinary remedy never awarded as of right." *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 24 (2008). "A plaintiff seeking a preliminary injunction must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief,

that the balance of the equities tips in his favor, and that an injunction is in the public interest." *Id.* at 20.

Plaintiff's motion meets all four factors. *See* Exhibit A, Wodehouse Declaration; Exhibit B, Daniels Declaration. *First*, the challenged law restricts the possession of firearms without any sufficiently close historical analogue. *Second*, absent preliminary relief, Plaintiff is unable to exercise his Second Amendment right to bear arms. Constitutional injuries of this kind are quintessential irreparable harms. *Finally*, the balance of the equities and the public interest weigh in favor of injunctive relief, as Plaintiff's motion seeks to vindicate a constitutional right.

For these reasons, Plaintiff respectfully requests that the Court grant his motion.

Dated: July 7, 2024 Respectfully submitted,

*/s/ Ron Psmith*
Ron Psmith, #67924
Plaintiff's Attorney

**EXHIBIT A**

**UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF AMES**

| | |
|---|---|
| P.G. WODEHOUSE,<br><br>*Plaintiff*,<br><br>v.<br><br>ALISTER MACKENZIE, *in his official capacity as Chief of Ames City Police*,<br><br>*Defendant.* | Docket No. 1:24-cv-00183-CL |

## Declaration of P.G. Wodehouse

I, P.G. Wodehouse, located in the City of Ames, declare as follows:

1. My name is P.G. Wodehouse.

2. I am a retired member of the Ames City Police Department, where I worked for twenty years.

3. I started in the Department as a line officer and retired as the head of the Department's detective function.

4. Since retiring from the force, I've made every effort to remain engaged in the Ames community.

5. To that end, I joined the Ames Buffalo Soldiers Motorcycle Club. The Club welcomes motorcycle hobbyists interested in participating in charitable activities throughout Ames state.

6. As a member of the Club, and until the enactment of the Permitted Event Restriction, I served for years as volunteer security for permitted events at Fairview Park.

7. To ensure the safety of myself and the participants of these events, I always carried a firearm while providing security in this capacity pursuant to my validly issued License to Carry.

8. Since the enactment of the Permitted Event Restriction, however, I have refused to provide security during permitted events in the park because the law prohibits me from carrying my firearm while I volunteer in this capacity.

9. Absent the law, I would continue to volunteer as security during permitted events inside Fairview Park.

**So Declared**:

/s/ P.G. Wodehouse
P.G. Wodehouse
Dated: July 7, 2024

**EXHIBIT B**

**UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF AMES**

| | |
|---|---|
| P.G. WODEHOUSE,<br><br>*Plaintiff*,<br><br>v.<br><br>ALISTER MACKENZIE, *in his official capacity as Chief of Ames City Police*,<br><br>*Defendant.* | Docket No. 1:24-cv-00183-CL |

## Declaration of Welles Daniels

I, Welles Daniels, located in the City of Ames, declare as follows:

1. My name is Welles Daniels.

2. I serve as the Director of the Ames City Civil Liberties Union, an organization dedicated to vindicating the civil liberties of its members, including by combating racial discrimination in Ames City.

3. For years, the ACCLU has hosted permitted events in Fairview Park.

4. The ACCLU uses Fairview Park for its events because of its size and popularity. The park is 844 acres large, contains 22 playgrounds, 6.2 miles of drives, two outdoor theaters, the Ames City Zoo, and countless large, open public spaces within which large organizations and groups of people can gather.

5. Indeed, given the popularity of the ACCLU's causes, its events in Fairview Park regularly draw crowds exceeding 1,000 people.

6. To help ensure the safety of my staff and the public who attend the ACCLU's events, I have in the past relied on members of the Ames Buffalo Soldiers Motorcycle Club, including P.G. Wodehouse, as extra security for these events. While the Ames City police force dedicates extra manpower to the Park to support events, the added protection provided by the Club is essential to the safety of the ACCLU's events.

7. After Ames passed its law barring the carrying of firearms at permitted events in the park, neither the Club nor Mr. Wodehouse has been willing to provide security for the ACCLU's events. Without their firearms, they feel they are unable to defend themselves or adequately protect the members of the public gathered to attend the ACCLU's events.

**So Declared**:

/s/ Welles Daniels
Welles Daniels, Director of the ACCLU
Dated: July 7, 2024