

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA**

NATIONAL RIFLE ASSOCIATION	)	
OF AMERICA, INC., <i>et al.</i> ,	)	
	)	
<i>Plaintiffs,</i>	)	Civil Action No. 4:18-cv-137-MW-
	)	CAS
v.	)	
	)	
PAM BONDI, <i>et al.</i> ,	)	
	)	
<i>Defendants.</i>	)	

**DECLARATION OF MARION P. HAMMER**

I, Marion P. Hammer, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a citizen of the United States and a resident and citizen of Florida. I am competent to testify, and I make this Declaration based on personal knowledge of the facts stated herein which I declare to be true and correct under penalty of perjury.

2. I am a former President of the National Rifle Association of America, Inc. ("NRA"), and I frequently represent the NRA's interests in the State of Florida. I have provided assistance to the NRA in preparing this lawsuit, and I have been identified in national news stories associated with the suit.

3. After news of the Parkland shooting broke, I received numerous harassing emails and phone calls threatening my life and physical well-being. Those threats continue to this day. Attached as Exhibit 1 to this Declaration are true and correct copy of 14 such emails, which are representative of the scores of other threatening emails I have received.

4. One email, for example, referred to me as a “Tw\*t” and “a vile c\*t” and stated that “I love that you freaks always get taken down eventually.” See Exhibit 1 at 1. Another individual called me a “nasty old ‘f\*\*king piece of sh\*t” and stated “Blood on your hands, you’re going down.” See *id.* at 4. Another representative email states that “Next time I hope it’s someone in your family looking down the barrel of a gun or shot in the back trying to flee some great Floridian.” See *id.* at 11.

5. I have also received scores of threatening and harassing phone calls from individuals who have used offensive and derogatory language, some of whom have threatened my life and physical well-being.

6. I have worked with the NRA and its attorneys in this litigation to help identify 18-to-21-year-old Florida residents who may be interested in participating in the lawsuit. Many of the individuals I have spoken with are afraid of the harassment and threats they would be exposed to were they to

become publicly associated with the litigation and have refused to participate because of these concerns.

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

4/12/2018  
Date

Marion P. Hammer  
Marion P. Hammer

Executed in TALLAHASSEE, Florida

# EXHIBIT 1

**From:** [REDACTED]@gmail.com>  
**To:** MPHammer1 <MPHammer1@aol.com>  
**Sent:** Fri, Mar 9, 2018 10:38 pm  
**Subject:** You

Dear Twat You are a vile cunt. I hope you get to experience a ammo dido. I can't wait till the day I flip on the news to see you mourning a gunshot victim. You're disgusting and exactly what's wrong with people today. I seriously hope karma comes around for you soon. You and that other ammosexual the fairy Wayne LaPierre, what a masculine name to match the fairy he is. I hope to see he died of a gunshot wound that took hours of pain before he succumbed. I'm not anti gun, I'm anti morons without morals, hence the reason for this letter.

Fuck you. You worthless cunt. You're a whore, not freedom fighter.

I love that you freaks always get taken down eventually, I love the perp walks. My god I hope you experience everything you've given. I hope you don't a moment of peace for the rest of your pitiful lives.

Manafort and Shkreli both went down today, you two cunts are next! Can't wait! Enjoy your cell, I know I will seeing you in it.

Pleasantly yours,  
Fuck you.

**From:** [REDACTED]@comcast.net>

**Date:** March 27, 2018 at 5:58:03 PM EDT

**To:** <MPHammer1@aol.com>

**Subject:** God's justice

God is a just God.

Those who aid and support the killing of innocents will burn forever in eternal damnation.

Repent and change your ways or burn forever in hell.

From: [REDACTED]  
To: MPHammer1  
Sent: Mon, Mar 26, 2018 4:27  
am Subject: you are a VILE  
CUNT

enough said.

From: [REDACTED]  
To: MPHammer1  
Sent: Sun, Mar 25, 2018 12:36 pm  
Subject: Re: You're getting people killed every day

Marion,

There is a special place in hell for nasty old rednecks like yourself. Blood on your hands, you're going down.

[REDACTED]

On Tue, Feb 20, 2018 at 6:50 PM, [REDACTED]@gmail.com> wrote:

Marion,  
You nasty old "fucking piece of shit".  
You're getting people killed every day.



-----Original Message-----

From: [REDACTED]

To: MPHammer1

Sent: Sun, Mar 25, 2018 1:02 pm

Subject: May your soul rot in hell

From: [REDACTED]  
To: MPHammer1  
Sent: Sat, Mar 24, 2018 11:27 am  
Subject: support

you are a leader of a terrorist organization, no different from ISIS or any other hostile organization, you area serial killer that for the time being is allowed to walk among the innocent, I am waiting for the day your blood soaked hands are in handcuffs.

**From:** [REDACTED]@wirespring.com>

**Date:** March 20, 2018 at 3:57:04 PM EDT

**To:** ",MPHammer1"@aol.com

**Subject:** You are a POS Hammer and it's time for you to bow out!

May god forgive your soul.

**From:** [REDACTED]@gmail.com>

**Date:** March 18, 2018 at 3:55:53 PM EDT

**To:** [MPHammer1@aol.com](mailto:MPHammer1@aol.com)

**Subject:** Gun lobbyists are POS'

You are on my shit list, you are on GOD'S shit list. You all have blood on your hands.

From: [REDACTED]  
To: MPHammer1  
Sent: Sat, Mar 10, 2018 12:39  
pm Subject: Re: NRA

Marion,

You dyspeptic nasty old bag,

Your extremist ideology is getting a lot of people killed.

Conspiring to murder people is criminal, the authorities will be coming for your sorry old ass sooner than later.  
May you rot in a prison cell before you rot in hell.

[REDACTED]

On Fri, Feb 23, 2018 at 5:22 PM, [REDACTED] <[\[REDACTED\]@gmail.com](#)> wrote:

The Republican's two legged stool, mental health and school security - no commitment to Gun Control, tumbles the other two.

The NRA, all the elements of a terrorist organization.

What is the "good man with a gun stops the bad man..." if not a call for gun violence vigilantism.

Less guns, let's leave law enforcement to the professionals.

And let's give the professionals the proper resources to succeed.

On Sun, Feb 18, 2018 at 5:50 PM, [REDACTED] > wrote:

Marion,

You dyspeptic old bag, your NRA promoted gun policy are getting people killed every day.

Blood on your hands, you should be arrested on manslaughter charges you nasty old coot.

[REDACTED]

From: [REDACTED]  
To: MPHammer1  
Sent: Mon, Mar 12, 2018 10:20 am  
Subject: NRA

We in Florida have heard about your work in the NRA for many years.

We like to tell you that you are horrifying ugly murderous

You are culpable for the deaths of all the children whi been killed in Florida

How are you can maintain this position and have any conscience and humanity is beyond comprehension. . And you can't possibly call yourself religious when you support hatred and murderous intent.

If you are religious think God will judge you and it will not be good for you. While you're standing up there as a shill for the NRA you are a vile and despicable human being

You are as ugly inside as you are on the outside

Many are holding you accountable. Yes you need your guns because you have no strength of character and are ugly vile Stupid ignorant and murderous. There is no defense for you. Should have been you as one of the victims

From: [REDACTED]  
To: MPHammer1  
Sent: Wed, Feb 28, 2018 10:00 pm  
Subject: Gun Violence.

You have blood on your hands. 17 innocent people this time. Next time I hope it's someone in your family looking down the barrel of a gun or shot in the back trying to flee some great Floridian. Please give me one good reason why anyone needs an automatic weapon except to display power over others. There is a special place reserved in Hell for people like you.

Sent from my iPad

From: [REDACTED]  
To: MPHammer1  
Sent: Tue, Feb 27, 2018 3:13 pm Subject:  
Regarding that New Yorker article

Fuck you, Cunt. That is all.



From: [REDACTED]  
To: MPHammer1  
Sent: Fri, Feb 23, 2018 8:09 pm  
Subject: You are pure evil. I will help drive the NRA from this country

You snarl because the teens of your state are fighting back. The smell of fresh blood is still in the air, and you are trying to beat back even HALF MEASURES from the Florida legislature.

If there is a heaven and a hell, you are surely going to burn for all eternity for the evil you've propagated while on earth.

From: [REDACTED]  
To: MPHammer1  
Sent: Fri, Feb 23, 2018 3:43 pm  
Subject: No words

For your level of evil. I thought the idiot in office was the biggest soulless troll, but I'll be damned if you aren't a close second, tied of course to the many others who applaud senseless murder. I'm horrified at your behavior. Nothing more than a truly ugly from the inside out redneck. Rot in hell you soulless cunt.

[Sent from Yahoo Mail for iPhone](#)