

EXHIBIT B

Affidavit of Dean Moser

This exhibit contains the Affidavit of Dean Moser submitted in support of Plaintiffs' Complaint and Motion for Preliminary Injunction.

AFFIDAVIT OF DEAN MOSER

STATE OF MICHIGAN)

) ss.

COUNTY OF OAKLAND)

The undersigned, DEAN MOSER, upon being duly sworn, says:

1. I have personal knowledge of the facts contained within this declaration.
2. I am a resident of the State of Michigan and over the age of 21 years.
3. I do not possess a license to carry a concealed pistol.
4. On or about February 10, 2025, I personally appeared at the Troy Police Department with the intention to acquire a License to Purchase a firearm (“LTP”).
5. I was advised by the clerk at the department that the fee for the LTP would be \$5.00. I was asked to provide my driver’s license and to complete a pre-application form.
6. I completed the form, provided it to the clerk.
7. After waiting for approximately 10 minutes, the clerk called me to the window to advise me that my application was going to be reviewed and that I would hear back from them in approximately one week.
8. On or about February 20, 2025, I received a written response from the Troy Police Department’s Chief of Police, Josh Jones, indicating that my application for an LTP was denied. (Attached hereto as Attachment A)
9. On or about June 18, 2025, I personally appeared at Freedom Firearms gun store in Battle Creek, MI, with the intention to purchase a firearm.
10. The store clerk at Freedom Firearms advised me that in order to purchase a pistol, I would have to apply for and receive an LTP and recommended that I visit the nearby Battle Creek Police Department to obtain one.

11. Based upon the recommendation of the Freedom Firearm store clerk, I departed the gun store and traveled to the Battle Creek Police Department's office to acquire the LTP.
12. After appearing at the Battle Creek Police Department's office, I was asked by the clerk to present my identification and pay a \$5.00 fee, and I did so.
13. After a short time, I was advised by the clerk at the police station that if I were to apply, they would deny my application due to a previous LTP denial by the Troy Police Department.
14. The clerk at the Battle Creek Police Department advised me that I would have to take up the denial of the LTP with the Troy Police Department and that there was nothing further the Battle Creek Police Department could do to assist me in obtaining an LTP.
15. Upon my request, I asked the Battle Creek Police Department to accept my \$5.00 payment and then process my application for an LTP anyway, and if denied, to provide me with a written documentation of denial.
16. After waiting approximately another 15 minutes, the Battle Creek Police Department clerk called me back to the counter and presented me with a letter explaining that my application for the LTP was denied. (Attached hereto as Attachment B)
17. At the time I applied for an LTP, I was not charged with any crime.
18. I have never been convicted in any court of a felony, or any other crime, for which the judge could have imprisoned me for more than one year.
19. At no time have I ever been a fugitive from justice.
20. I am not an unlawful user of, or addicted to, marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance.
21. At no time have I ever been adjudicated mentally defective or committed to a mental institution.

22. At no time have I ever been discharged from the Armed Forces under dishonorable conditions.

23. At no time have I ever been subject to a court order restraining me from harassing, stalking, or threatening a child of mine, an intimate partner or child of such partner.

24. At no time have I ever been convicted in any court of a misdemeanor crime of domestic violence.

25. I am a citizen of the United States, a lawful resident of the State of Michigan and at no time have I ever denounced my United States citizenship.

26. At no time have I ever been the subject of an order finding that I am legally incapacitated.

27. At no time have I ever been the subject of a personal protection order.

28. At all times I applied for an LTP, I was not under an order of probation nor any conditions of probation.

29. At no time have I ever been found not guilty by reason of insanity.

30. At no time have I ever been the subject of an Extreme Risk Protection Order.

31. At no time have I ever been adjudged insane or legally incapacitated in Michigan or elsewhere.

32. I am a member of Michigan Coalition for Responsible Gun Owners Inc.; Michigan Gun Owner's Inc.; and Michigan Open Carry, Inc.

DATE: March 12, 2026

Dean Moser
By: DEAN MOSER

Subscribed and sworn to before me
March 12, 2026.

Shannon Walsh

My Commission Expires: 6/11/2030

