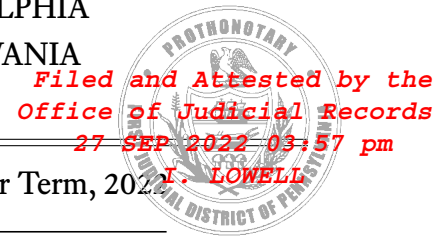


COURT OF COMMON PLEAS OF PHILADELPHIA
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
TRIAL DIVISION - CIVIL



Gun Owners of America Inc., Gun Owners Foundation, Terrence Ledwell, Laura Leonard-McBride, and James Sandefur,

Plaintiff(s);

vs.

City of Philadelphia, and Mayor James F. Kenney,

Defendant(s).

September Term, 2022
No. _____

COMPLAINT

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after the complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. if you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

PHILADELPHIA BAR ASSOCIATION
Lawyer Referral and Information Service
1101 Market Street, 11th Floor
Philadelphia, Pennsylvania 19107
(215) 238-1701

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio, vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

ASOCIACIÓN DE LICENCIADOS DE FILADELPHIA
Servicio De Referencia E Información Legal
1101 Market Street, 11th Floor
Filadelfia, Pennsylvania 19107
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Case ID: 220902647

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**Gun Owners of America Inc., Gun
Owners Foundation, Terrence Ledwell,
Laura Leonard-McBride, and
James Sandefur,**
Plaintiff(s);

vs.

**City of Philadelphia, and
Mayor James F. Kenney,**
Defendant(s).

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

September Term, 2022
No. _____

COMPLAINT

Pennsylvania law expressly preempts the Mayor from banning firearms in public recreational facilities. Nonetheless, Mayor Jim Kenney has attempted to do so. He may not.

Pennsylvania law is “crystal clear”: regulation of firearms is a matter of statewide concern, and must be undertaken by the General Assembly. *See National Rifle Ass’n v. City of Philadelphia*, 977 A.2d 78, 82 (Pa. Cmwlth. 2009). Mayor James Kenney is not permitted to regulate firearms by executive fiat, as he attempts here.

PARTIES

1. Plaintiff **Gun Owners of America, Inc.** (“GOA”) is a California non-stock corporation with its principal place of business at 8001 Forbes Pl., Springfield, Virginia. GOA is orga-

nized and operated as a non-profit membership organization exempt from federal income taxes under the 26 U.S.C. § 501 (c) (4). GOA was incorporated in 1976 to preserve, protect, and defend the Second Amendment rights of gun owners. GOA has thousands of members and supporters, including residents of the City of Philadelphia, who possess Pennsylvania License(s) to Carry Firearms and wish to exercise their right to lawfully possess firearms at recreational facilities.

2. Plaintiff **Gun Owners Foundation** (“GOF”) is a Virginia non-stock corporation with its principal place of business in Virginia, at 8001 Forbes Place, Springfield, VA 22151. GOF is organized and operated as a nonprofit legal defense and educational foundation that is exempt from federal income taxes under 26 U.S.C. § 501 (c) (3). GOF is supported by gun owners across the country, including Philadelphia residents who are being irreparably harmed by the challenged ordinance. GOF routinely litigates across the country to defend its supporters’ right to keep and bear arms.
3. Plaintiff Terrence **Ledwell** is an adult individual and resident of Philadelphia. He has a valid Pennsylvania License to Carry Firearms and both has– and intends to– carry in recreational facilities operated by the City of Philadelphia.
4. Plaintiff Laura **Leonard-McBride** is an adult individual and resident of Philadelphia. She has a valid Pennsylvania License to Carry Firearms and both has– and intends to– carry in recreational facilities operated by the City of Philadelphia.
5. Plaintiff John **Sandefur** is an adult individual and resident of Philadelphia. He has a valid Pennsylvania License to Carry Firearms and both has– and intends to– carry in recreational facilities operated by the City of Philadelphia.

6. Defendant City of **Philadelphia**, is a Municipal Corporation of the First Class of the Commonwealth of Pennsylvania under the First Class City Home Rule Act of April 21st, 1949, P.L. 665, § 1 *et seq.*
7. Defendant Mayor James F. **Kenney**, named in his official capacity as the Mayor of the City of Philadelphia, entered an executive order on September 27th 2022 purporting to ban firearms from city park facilities. Mayor Kenney’s principal office is City Hall # 215, Philadelphia, PA 19107.

JURISDICTION & VENUE

8. This Court has unlimited original jurisdiction, and venue is proper as the Defendants are a municipality– and public employee acting in their official capacity– within this judicial district. 42 Pa. C.S. § 931, Pa. R.C.P. 1006 (a) and 2103 (b).
9. Both the City of Philadelphia and Mayor Kenney are further subject to the personal jurisdiction of this Court, as they are located in – or reside within– the Commonwealth of Pennsylvania.

ALLEGATIONS

10. Pennsylvania Law provides “[n]o county, municipality or township may in any manner regulate the lawful ownership, possession, transfer or transportation of firearms ...” *FOAC v. Lower Merion Twp.*, 151 A.3d 1172, 1176 (Pa. Cmwlth. 2016) (quoting 18 Pa. C.S. § 6120).
11. Nonetheless, on September 27th 2022, Mayor Kenney issued an Executive Order # 4-22, which prohibits any person carrying firearms from “enter[ing] or remain in or on any indoor

or outdoor recreational premises operated by the Department of Parks and Recreation [], including any recreation center, ballfield, court, playground, pool, tot lot, or similar facility, but excluding park trails and passive park space.” (Exhibit A).

12. Individuals with a valid Pennsylvania License to Carry Firearms are permitted to carry firearms either openly- or concealed- throughout the Commonwealth of Pennsylvania. 18 Pa. C.S. § 6109. The General Assembly expressly provided that a person “licensed to carry a firearm” is permitted to carry “upon any public property in a city of the first class”. *Id.* § 6108.
13. It is “crystal clear” that only the General Assembly is permitted to regulate firearms. *See Nat’l. Rifle Ass’n.*, 977 A.2d at 82. Further, in 2016, the Commonwealth Court also explicitly struck similar restrictions on carry at public parks due to Pennsylvania’s firearms preemption statute. *See Lower Merion Twp.*, 151 A.3d 1172.
14. The Mayor’s September 27th Executive Order directly regulates the lawful possession of firearms in violation of § 6120 (a).
15. Therefore, the September 27th Executive Order violates Pennsylvania’s firearms preemption statutes and may not be enforced. *See* 18 Pa. C.S. § 6120.

LEGAL COUNTS

Count # 1

Violation of Pennsylvania's Firearms Preemption

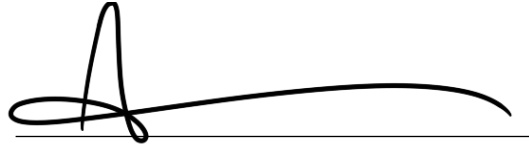
Id

16. Plaintiffs incorporates by reference ¶¶ 1–15 above as if fully set forth herein.
17. Plaintiffs seek a Declaratory Judgment pursuant to 42 Pa. C.S. §§ 7351 *et seq.* that the Executive Order (# 4-22) signed by Mayor James Kenney on September 27th 2022 is unlawful.
18. Section 6120 (a) preempts the City of Philadelphia and Mayor Jim Kenney from regulation of lawful possession of firearms; Executive Order # 4-22 directly regulates the lawful possession of firearms.
19. The City of Philadelphia and Mayor Kenney's enactment of the September 27th 2022 Executive Order directly violates Pennsylvania law, and may not be enforced.

RELIEF REQUESTED

WHEREFORE, Plaintiffs ask this Court to find Mayor Jim Kenney's and the City of Philadelphia's September 27th 2022 Executive Order # 4-22 is pre-empted by 18 Pa. C.S. § 6120, and enter a preliminary and permanent injunction against the City of Philadelphia from enforcing any prohibition of firearms at City facilities in violation of Pennsylvania's firearms preemption statute, award costs, and any such other relief as this Court may find just and proper.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Andrew B. Austin', written over a horizontal line.

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Pennsylvania Bar # 323768
Attorney for Plaintiffs

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EXHIBIT A

Mayor Jim Kenney's Executive Order # 4-22

retrieved from www.phila.gov/media/20220927104203/Executive-Order-2022-04.pdf

CITY OF PHILADELPHIA
OFFICE OF THE MAYOR - EXECUTIVE ORDER 4 - 22
DEPARTMENT OF PARKS AND RECREATION – COMMISSIONER’S DIRECTIVE

MANAGEMENT AND OPERATIONAL POLICY PROHIBITING FIREARMS AND OTHER DEADLY WEAPONS AT CITY RECREATION FACILITIES

WHEREAS, the Philadelphia Department of Parks and Recreation (the “Department”) has the power and duty to “manage and operate all City recreational facilities” pursuant to Section 5-600 of the Philadelphia Home Rule Charter (the “Charter”); and

WHEREAS, City recreational facilities are owned and operated by the City by and through the Department consistent with its power and duties under the Charter; and

WHEREAS, since 2019, nearly 300 reported incidents of gun violence have occurred at City recreation facilities, in addition to dozens of other incidents of violence with a deadly weapon; and

WHEREAS, most recently Tiffany Fletcher, a Department recreation center employee, was tragically shot and killed on the grounds of Mill Creek Recreation Center on September 9, 2022; and

WHEREAS, approximately 1,700 City employees work on site at recreation facilities, providing critical support to children, families, and our entire Philadelphia Community;

WHEREAS, City recreation facilities are integral to our neighborhood communities: consistently used for after-school activities, sports, and community meetings; reliably offering services from summer camps and digital access to meal distribution, particularly to seniors and school-age children; and dependably available as safe places for all residents of our communities – of every demographic and socio-economic status – to play, learn, relate, and relax together; and

WHEREAS, it is crucial to take steps to assure our City recreation facilities are a safe place for children and all of the Philadelphia community to gather;

WHEREAS, gun violence at City recreational facilities necessitates immediate action; and

WHEREAS, adoption of a policy prohibiting the entry of persons carrying firearms or other deadly weapons on City recreation facilities will increase safety of these facilities for City employees and the public; and

AND NOW, THEREFORE, James F. Kenney, Mayor of the City of Philadelphia, and Kathryn Ott Lovell, Commissioner of the Department of Parks and Recreation, pursuant to all

authority granted under The Philadelphia Home Rule Charter, including but not limited to Sections 1-102, 4-100, and 5-600 thereof; do hereby adopt the following order and directive regarding the management and operation of Department recreation facilities:

1. **Weapons Prohibited.** No one carrying firearms or other deadly weapons is permitted to enter or remain in or on any indoor or outdoor recreation premises operated by the Department of Parks and Recreation (the "Department"), including any recreation center, ballfield, court, playground, pool, tot lot, or similar facility, but excluding park trails and passive park space (collectively "City Recreation Facilities"). This Management and Operational Policy Prohibiting Firearms and Other Deadly Weapons at City Recreation Facilities (this "Policy") shall apply exclusively to the list of City-owned premises attached hereto as Exhibit A. The Commissioner of the Department may designate additional City Recreation Facilities subject to this Policy provided that an up-to-date list of all premises covered by this Policy shall be posted on the Department's publicly accessible website.

2. **Signs.** The Commissioner of the Department of Parks and Recreation shall cause signs prohibiting firearms and other deadly weapons to be conspicuously displayed at entrances to all recreation centers and at other prominent locations throughout the City Recreation Facilities subject to this Policy.

3. **Exceptions.** Nothing in this Executive Order and Commissioner's Directive shall apply to law enforcement officers; or to trained security personnel acting under contract or supervision of a government agency.

4. **Enforcement.**

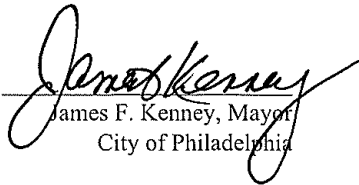
(a) The safety of recreation staff and of the public shall be of paramount importance. Recreation staff with a reasonable belief that this Policy is being violated shall contact the police. No recreation staff shall take any enforcement action under this Policy without police present.

(b) With police on the premises, persons reasonably believed to be violating this Policy shall be so informed and asked to leave the premises.

(c) If a person refuses to leave, the person shall be treated as a trespasser, as provided by law. *See* 18 Pa. C.S. § 3503 (criminal trespass); Phila. Code § 10-615(2)(f) (defiant trespass).

5. **Effective Date.** This Policy shall be effective immediately.

Adopted September 27, 2022


James F. Kenney, Mayor
City of Philadelphia



Kathryn Ott Lovell, Commissioner
Department of Parks and Recreation
City of Philadelphia

EXHIBIT A

Any indoor or outdoor recreation space at the following City-owned premises, including any recreation center, ballfield, court, playground, pool, tot lot, or similar facilities, but excluding park trails and passive park space:

1. 10th and Lemon Playground, 1015 MOUNT VERNON ST, 19123
2. 11th and Cecil B Moore Playground, 1737 N 11TH ST, 19122
3. 12th and Cambria Playground, 2900 N 12TH ST, 19133
4. 20th and Tioga Field, 2001 W TIOGA ST, 19140
5. 22nd and Catharine Park, 2200 CATHARINE ST, 19146
6. 22nd and Ontario Park, 3400 N 22ND ST, 19140
7. 26th and Pennsylvania Playground, 2700 PENNSYLVANIA AVE, 19130
8. 31st and Cumberland Play Lot, 2462 N 31ST ST, 19132
9. 31st and Huntingdon Play Lot, 2550 N 31ST ST, 19132
10. 31st and York Courts, 3101 W YORK ST, 19132
11. 33rd and Wallace Playground, 3302 WALLACE ST, 19104
12. 37th and Mount Vernon Playground, 614 N 37TH ST, 19104
13. 3rd and Norris Playground, 273 W NORRIS ST, 19122
14. 45th and Sansom Tot Lot, 4501 SANSOM ST, 19139
15. 48th and Woodland Playground, 4740 WOODLAND AVE, 19143
16. 61st and Cobbs Creek Park, 61ST & COBBS CREEK, 19143
17. 8th and Diamond Playground, 2098 N 08TH ST, 19122
18. A Albert Cherashore Playground, 900 W CHEW AVE, 19141
19. Al Pearlman Sports Center, 600 PORT ROYAL AVE, 19128
20. Albert W Christy Sr Recreation Center, 728 S 55TH ST, 19143
21. Allens Lane Art Center, 651 W ALLENS LN, 19119
22. American Legion Playground, 4801 DEVEREAUX AVE, 19135
23. Ann P Nichols Park, 5430 RACE ST, 19139
24. Arrow Field, 640 W WALNUT LN, 19128
25. Athletic Recreation Center, 2626 W JEFFERSON ST, 19121
26. Awbury Park and Recreation Center, 6101 ARDLEIGH ST, 19138
27. Bartrams Garden, 5400 LINDBERGH BLVD, 19143
28. Belfield Recreation Center, 2109 W CHEW AVE, 19138
29. Belmont and Edgley Fields, 4105 EDGLEY AVE, 19131
30. Belmont Grove, 2076 BELMONT MANSION DR, 19131
31. Belmont Plateau, 1800 BELMONT MANSION DR, 19131
32. Ben Barkan Park, 4998 SPRUCE ST, 19143
33. Benson Park, 1444 N 04TH ST, 19122
34. Bernard Samuel Playground, 3539 GAUL ST, 19134

35. Black Coyle and McBride Playground, 2137 E HAZZARD ST, 19125
36. Blue Bell Park, 844 W WALNUT LN, 19144
37. Boniface Piccoli Playground, 1500 E CAYUGA ST, 19124
38. Bridesburg Recreation Center, 4625 RICHMOND ST, 19137
39. Burholme Park, 7370 CENTRAL AVE, 19111
40. Butler and Percy Play Lot, 919 W BUTLER ST, 19140
41. Carmella A DiTizio Playground, 2150 WAKELING ST, 19124
42. Carousel House Recreation Center, 4300 AVENUE OF THE REPUBLIC, 19131
43. Carroll Park, 5801 W GIRARD AVE, 19131
44. Cecil B Moore Recreation Center, 2563 N 22ND ST, 19132
45. Cedar Park, 4917 BALTIMORE AVE, 19143
46. Chamounix Fields North, 3299 CHAMOUNIX DR, 19131
47. Chamounix Fields South, 3701 CHAMOUNIX DR, 19131
48. Chamounix Tennis Courts, 3601 CHAMOUNIX DR, 19131
49. Charles A Baker Playground, 5433 LANSDOWNE AVE, 19131
50. Charles A Papa Playground, 6839 LANSDOWNE AVE, 19151
51. Charles A Russo Playground, 7301 TORRESDALE AVE, 19136
52. Charles H Chew Jr Playground, 1800 WASHINGTON AVE, 19146
53. Charles J Ziehler Playground, 5530 B ST, 19120
54. Charles M Finley Playground, 1006 E HORTTER ST, 19150
55. Charles T Mitchell Jr (Seeger) Park, 1020 LOMBARD ST, 19147
56. Clarence H Clark Park, 4301 CHESTER AVE, 19104
57. Clayborne and Lewis Playground, 1101 N 38TH ST, 19104
58. Clifford Park, 6141 WISSAHICKON AVE, 19144
59. Cliveden Park, 501 E JOHNSON ST, 19119
60. Cloverly Park, 5425 WISSAHICKON AVE, 19144
61. Cobbs Creek Community Environmental Center, 700 COBBS CREEK PKWY, 19143
62. Cohocksink Recreation Center, 2901 CEDAR ST, 19134
63. Columbus Square, 1200 WHARTON ST, 19147
64. Commodore John Barry Playground, 2838 S 18TH ST, 19145
65. Conestoga Community Playground, 5300 MEDIA ST, 19131
66. Corporal George J Reed Jr Memorial Playground, 213 W ONTARIO ST, 19140
67. Coxe Park, 2132 CHERRY ST, 19103
68. Dairy Fields, 3700 MOUNT PLEASANT DR, 19121
69. Dan Shissler Recreation Center, 1826 BLAIR ST, 19125
70. Daniel Boyle Memorial Recreation Center, 13045 KELVIN AVE, 19116
71. Daniel E Rumph II Recreation Center, 108 E JOHNSON ST, 19144
72. Dave Dougherty (Hetzell) Field, 1301 E COLUMBIA AVE, 19125
73. David P Montgomery Field, 5366 HERMIT LN, 19128
74. Delancey Park, 311 DELANCEY ST, 19106

75. Disston Park, 6447 KEYSTONE ST, 19135
76. Disston Recreation Center, 4500 DISSTON ST, 19135
77. Donald P Finnegan Recreation Center, 1231 S 30TH ST, 19146
78. Dr Martin Luther King Jr Older Adult Center, 2102 W CECIL B MOORE AVE, 19121
79. Dr Martin Luther King Jr Recreation Center, 2101 W CECIL B MOORE AVE, 19121
80. Dr Nicola Capitolo Playground, 900 FEDERAL ST, 19147
81. East Passyunk Community Recreation Center, 1027 MIFFLIN ST, 19148
82. East Poplar Playground, 800 N 08TH ST, 19123
83. Eastwick Park, 7401 LINDBERGH BLVD, 19153
84. Eastwick Regional Playground, 7899 MERCURY PL, 19153
85. Edgley Fields, 2100 RESERVOIR DR, 19121
86. Edward Houseman Playground, 900 E GODFREY AVE, 19124
87. Elizabeth M Picariello Playground, 10815 CALERA RD, 19154
88. Eric N Casiano Field, 2301 N 04TH ST, 19133
89. Eric W (Hank) Gathers Jr Recreation Center, 2501 W DIAMOND ST, 19121
90. Ernest L Tustin Recreation Center, 1951 N 60TH ST, 19151
91. Etting Park, 3255 N MARSTON ST, 19129
92. Fairhill Square, 2649 N LAWRENCE ST, 19133
93. Fanny Kemble Abolitionist Memorial Park, 5641 OGONTZ AVE, 19141
94. Feltonville Recreation Center, 283 E WYOMING AVE, 19120
95. Fernhill Park, 4600 MORRIS ST, 19144
96. Fish Hatchery at Pleasant Hill Park, 9201 N DELAWARE AVE, 19136
97. Fisher Park, 572 W SPENCER ST, 19120
98. Fishtown Recreation Center, 1222 E MONTGOMERY AVE, 19125
99. Fletcher B Amos Playground, 1843 N 16TH ST, 19121
100. Ford Road Playground, 3905 FORD RD, 19131
101. Fox Chase Recreation Center, 7901 RIDGEWAY ST, 19111
102. Francis J Myers Recreation Center, 5800 CHESTER AVE, 19143
103. Francisville Recreation Center, 1822 WYLIE ST, 19130
104. Frank Glavin Playground, 2612 E WESTMORELAND ST, 19134
105. Frank JG Dorsey Memorial Playground, 4805 HELLERMAN ST, 19135
106. Frank McArdle Memorial Recreation Center, 2945 WELSH RD, 19152
107. Frank S Nelson Jr Memorial Recreation Center, 2528 N 03RD ST, 19133
108. Frankford and Solly Playground, 8318 FRANKFORD AVE, 19136
109. Franklin Delano Roosevelt Park, 3500 S BROAD ST, 19145
110. Franklin Delano Roosevelt Playground, 4300 HELLERMAN ST, 19135
111. Franklin Square, 200 N 06TH ST, 19106
112. Frederick Cione Playground, 2600 ARAMINGO AVE, 19125
113. Garden Court, 4710 SPRUCE ST, 19143
114. Garland and Bingham Fields, 620 GARLAND ST, 19120

115. George A Vare Recreation Center, 2600 MORRIS ST, 19145
116. George C Pelbano Playground, 2138 SOLLY AVE, 19152
117. George Connell Park, 6401 ELMWOOD AVE, 19142
118. George Jacobs Playground, 4500 LINDEN AVE, 19136
119. Gerald J Maguire Playground, 155 W LEHIGH AVE, 19133
120. Gold Star Park, 613 WHARTON ST, 19147
121. Gustine Recreation Center, 4842 RIDGE AVE, 19129
122. Haddington-Marshall L Shepard Sr Recreation Center, 5700 HAVERFORD AVE, 19131
123. Hagert Street Playground, 2034 E HAGERT ST, 19125
124. Hammond and Nedro Fields, 5901 HAMMOND AVE, 19120
125. Hancock Playground, 1403 N HANCOCK ST, 19122
126. Happy Hollow Recreation Center, 4800 WAYNE AVE, 19144
127. Harrowgate Park, 3455 KENSINGTON AVE, 19134
128. Harry S McDevitt Playground, 3580 SCOTTS LN, 19129
129. Hawthorne Cultural Center, 1200 CARPENTER ST, 19147
130. Hedge Street Park, 4610 HEDGE ST, 19124
131. Helen G Sturgis Playground, 6420 N 2ND ST, 19126
132. Heritage Park Playground, 1533 W CLEARFIELD ST, 19132
133. Hillside Recreation Center, 201 FOUNTAIN ST, 19127
134. Holme Crispin Park, 2999 HOLME AVE, 19136
135. Holmesburg Recreation Center, 4510 RHAWN ST, 19136
136. Horton Street Play Lot, 233 HORTON ST, 19139
137. Howard McCall Sr Playground, 3007 JEFFERSON ST, 19121
138. Hunting Park, 1101 W HUNTING PARK AVE, 19140
139. Hunting Park Recreation Center, 1101 W HUNTING PARK AVE, 19140
140. Inn Yard Park, 4250 RIDGE AVE, 19129
141. J Francis Finnegan Playground, 6801 GROVERS AVE, 19142
142. Jack Horgan Memorial Field at Old Line Park, 8730 OLD LINE RD, 19128
143. Jacob Stinger Park, 1400 S 32ND ST, 19146
144. James Allen Shuler Playground, 3025 N 27TH ST, 19132
145. James J Ramp Playground, 3340 SOLLY AVE, 19136
146. James L Wright Playground, 3340 HAVERFORD AVE, 19104
147. James Otis Ford Playground, 633 SNYDER AVE, 19148
148. Jerome Brown Playground, 1987 W ONTARIO ST, 19140
149. Jim Junod Recreation Center, 12770 DUNKS FERRY RD, 19154
150. John (Steve) Schmidt Playground, 113 W ONTARIO ST, 19140
151. John A Lee Cultural Center, 4372 HAVERFORD AVE, 19104
152. John C Anderson Cultural Center, 5323 OVERBROOK AVE, 19131
153. John Dickinson Square, 1600 E MOYAMENSING AVE, 19148
154. John F Boyce Memorial Field, 5901 HENRY AVE, 19128

155. John J McCreesh Sr Playground, 6744 REGENT ST, 19142
156. John L Barrett Playground, 700 W DUNCANNON AVE, 19120
157. Johnny Sample Recreation Center, 250 S 63RD ST, 19139
158. Jose Manuel Collazo Park, 3261 MASCHER ST, 19140
159. Joseph A Ferko Playground, 1101 E CAYUGA ST, 19124
160. Joseph A Scanlon Playground, 1099 E TIOGA ST, 19134
161. Joseph C Fluehr Memorial Park, 4800 GRANT AVE, 19114
162. Joseph C McIlvain Playground, 5200 N PENN ST, 19124
163. Joseph Deni Recreation Center, 1381 RUAN ST, 19124
164. Joseph E Mander Playground, 2102 N 33RD ST, 19132
165. Joseph F Vogt Playground, 4351 UNRUH AVE, 19135
166. Joseph V Kelly Memorial Playground, 440 PARKER AVE, 19128
167. Juniata Park Older Adult Center, 1231 E SEDGLEY AVE, 19124
168. Karen Donnelly Park, 230 DICKINSON ST, 19147
169. Kelly Pool, 4200 LANSDOWNE DR, 19131
170. Kingseessing Recreation Center, 4901 KINGSESSING AVE, 19143
171. Lauretha Vaird Fields, 4800 WHITAKER AVE, 19120
172. Lawncrest Recreation Center, 6030 RISING SUN AVE, 19111
173. Lawrence E Murphy Recreation Center, 300 SHUNK ST, 19148
174. Lawrence Street Playground, 856 N LAWRENCE ST, 19123
175. Lindbergh Park, 2800 S 63RD ST, 19142
176. Lloyd Hall Recreation Center, 800 KELLY DR, 19130
177. Lonnie Young Recreation Center of East Germantown, 1100 E CHELTEN AVE, 19138
178. Malcolm X Memorial Park, 5100 PINE ST, 19143
179. Marconi Plaza, 2700 S BROAD ST, 19148
180. Marian Anderson Recreation Center, 776 S 17TH ST, 19146
181. Marian Winfield Hissey Recreation Center, 424 E INDIANA AVE, 19134
182. Marie Dendy Recreation Center, 1591 N 10TH ST, 19122
183. Marie Winchester Playground, 2326 N 15TH ST, 19132
184. Max Myers Playground, 1805 HELLERMAN ST, 19149
185. McMichael Park, 3201 MIDVALE AVE, 19129
186. McPherson Square, 601 E INDIANA AVE, 19134
187. Michael J Towey Playground, 1866 N HOWARD ST, 19122
188. Michael Palmer Playground, 2972 COMLY RD, 19154
189. Mifflin Square, 500 WOLF ST, 19148
190. Miles Mack Playground, 736 N 36TH ST, 19104
191. Mill Creek Playground and Recreation Center, 4728 BROWN ST, 19139
192. Montgomery and Croskey Play Lot, 2235 W MONTGOMERY AVE, 19121
193. Morris Estate Cultural Center, 1610 CHELTEN AVE, 19141
194. Morton Playground, 88 E HAINES ST, 19144

195. Mount Airy Playground, 7001 GERMANTOWN AVE, 19119
196. Narcissa S Cruz Recreation Center, 1401 N 06TH ST, 19122
197. Ned Wolf Park, 7018 MC CALLUM ST, 19119
198. Nelson M Herron Playground and Recreation Center, 1322 S 02ND ST, 19147
199. Nicetown Park, 4301 GERMANTOWN AVE, 19140
200. Norman (Butch) Ellis Playground, 714 N 39TH ST, 19104
201. Norris Square, 2100 N HOWARD ST, 19122
202. Northern Liberties Recreation Center, 315 FAIRMOUNT AVE, 19123
203. OConnor Pool, 577 S TANEY ST, 19146
204. Officer Robert Hayes Memorial Playground, 9949 PRESIDENT ST, 19115
205. Ohio House Fields, 4700 STATES DR, 19131
206. Olney Recreation Center, 199 E SPENCER AVE, 19120
207. Overington Park, 4600 LEIPER ST, 19124
208. Parkside Evans Recreation Center, 5271 PARKSIDE AVE, 19131
209. Parkside Fields, 5351 PARKSIDE AVE, 19131
210. Parkwood, 3359 MECHANICSVILLE RD, 19154
211. Penn Treaty Park, 1299 BEACH ST, 19125
212. Pennypack Environmental Center, 8600 VERREE RD, 19115
213. Pennypack on the Delaware, 8201 STATE RD, 19136
214. Penrose Memorial Playground, 1101 W SUSQUEHANNA AVE, 19133
215. Philadelphia Zoo, 3400 W GIRARD AVE, 19104
216. Pleasant Playground, 305 SLOCUM ST, 19119
217. Pretzel Park, 4300 SILVERWOOD ST, 19127
218. Price Street Play Lot, 185 W PRICE ST, 19144
219. Private Alfred J Simpson Memorial Recreation Center, 1010 ARROTT ST, 19124
220. Rainbow De Colores Playground, 2326 N 05TH ST, 19133
221. Ralph Brooks Park, 1601 S 20TH ST, 19145
222. Ramblers Recreation Center, 851 E TIOGA ST, 19134
223. Ramonita Negron Rivera Recreation and Community Center, 3201 N 05TH ST, 19140
224. Reverend Edward P Burke Playground, 2198 S 2ND ST, 19148
225. Reverend M Monkiewicz Recreation Center, 3201 RICHMOND ST, 19134
226. Reyburn Park, 1950 W LEHIGH AVE, 19132
227. Ridgway Park, 1301 CARPENTER ST, 19147
228. River Field, 302 N 24TH ST, 19103
229. Robert T Heitzman Recreation Center, 3645 AMBER ST, 19134
230. Robert Wilson III Park, 6100 BALTIMORE AVE, 19143
231. Roberto Clemente Playground, 1800 WALLACE ST, 19130
232. Ronald Trumbette Playground, 9050 TORRESDALE AVE, 19136
233. Rufus O Williams Memorial Playground, 700 COBBS CREEK PKY, 19143
234. Russell DeRitis Playground, 5655 GRAYS AVE, 19143

235. Sabatino La Noce Park, 5119 ROCHELLE AVE, 19128
236. Salvatore Pachella Memorial Field, 6901 HENRY AVE, 19128
237. Samuel F Houston Playground, 994 SEQUOIA RD, 19128
238. Samuel Rose Recreation Center, 1225 N 75TH ST, 19151
239. Schuylkill River Park, 400 S TANEY ST, 19146
240. Senator William Vincent Mullin Playground, 4301 PRINCETON AVE, 19135
241. Sergeant John J McVeigh Recreation Center, 3390 D ST, 19134
242. Seymour Tarken Recreation Center, 6350 FRONTENAC ST, 19111
243. Sherwood Park, 5601 BALTIMORE AVE, 19143
244. Shot Tower Recreation Center, 129 CARPENTER ST, 19147
245. Sister Cities Park, 200 N 18TH ST, 19103
246. Sister Clara Muhammad Square, 1035 N 48TH ST, 19131
247. Smith Memorial Playground and Playhouse, 3418 SMITH MEMORIAL DR, 19121
248. Solomon Sacks Playground, 400 WASHINGTON AVE, 19147
249. South Philadelphia Older Adult Center, 1430 E PASSYUNK AVE, 19147
250. Starr Garden Playground, 606 LOMBARD ST, 19147
251. Stenton Park, 1699 W COURTLAND ST, 19140
252. Stephen E Fotteral Square, 2400 N 11TH ST, 19133
253. Stiles Street Play Lot, 1608 W STILES ST, 19121
254. Susan Gorgas Park, 6424 RIDGE AVE, 19128
255. Sweetbriar Fields, 3700 SWEETBRIAR LN, 19131
256. Thomas B Smith Recreation Center, 2200 S 24TH ST, 19145
257. Thomas E Jardel Memorial Field, 1400 COTTMAN AVE, 19111
258. Thomas Hart Park, 1321 N 04TH ST, 19122
259. Thomas I Guerin Recreation Center, 2201 S 16TH ST, 19145
260. Thomas Mitchell Playground, 3694 CHESTERFIELD RD, 19114
261. Thomas P Stokley Recreation Center, 3000 EDGEMONT ST, 19134
262. Tip Top Playground, 1013 N HOPE ST, 19123
263. Tomlinson and Gifford Playground, 487 TOMLINSON RD, 19116
264. Torresdale and Enfield Fields, 4600 ENFIELD AVE, 19136
265. Torresdale Recreation Center, 9501 LEON ST, 19114
266. Trenton and Auburn Playground, 2222 E AUBURN ST, 19134
267. Triangle Park, 5419 UPLAND WAY, 19131
268. Venice Island Performing Arts and Recreation Center, 25 LOCK ST, 19127
269. Vernon Park, 5754 GERMANTOWN AVE, 19144
270. Verree and Susquehanna Playground, 8543 VERREE RD, 19111
271. Victor J Moss Memorial Field, 5726 TORRESDALE AVE, 19135
272. Vincent G Panati Playground, 3115 N 22ND ST, 19132
273. Von Colln Field, 2250 PENNSYLVANIA AVE, 19130
274. W Freeland Kendrick Recreation Center, 5878 RIDGE AVE, 19128

275. Walter Palumbo Recreation Center, 700 S 09TH ST, 19147
276. Water Tower Recreation Center, 267 E HARTWELL LN, 19118
277. Waterloo Playground, 2501 WATERLOO ST, 19133
278. Waterview Recreation Center, 5826 MCMAHON AVE, 19144
279. Webb Street Play Lot, 2536 WEBB ST, 19125
280. Weccacoe Square, 425 QUEEN ST, 19147
281. West Mill Creek, 5100 WESTMINSTER AVE, 19139
282. Wharton Square, 1300 S 23RD ST, 19146
283. Whitby Avenue Playground, 1300 COBBS CREEK PKY, 19143
284. William (Billy) Gambrel Playground, 1900 WAKELING ST, 19124
285. William A Cibotti Recreation Center, 2500 S 77TH ST, 19153
286. William A Lackman Memorial Playground, 1165 BARTLETT ST, 19115
287. William B Simons Recreation Center, 7224 WOOLSTON AVE, 19138
288. William H (Billy) Markward Memorial Playground, 400 S TANNEY ST, 19146
289. William Lanier Park, 1600 S 29TH ST, 19145
290. William T Granahan Playground, 6532 CALLOWHILL ST, 19151
291. Williams Moore Reed Memorial Park, 3600 N 11TH ST, 19140
292. Wilmot Park, 1801 MEADOW ST, 19124
293. Wingohocking Park, 1200 W WINGOHOCKING ST, 19140
294. Winter Street Greenway, 2000-2100 BLOCK OF BENJ FRANKLIN PKY, 19103
295. Wissahickon Environmental Center, 300 W NORTHWESTERN AVE, 19128
296. Wissahickon Neighbors Playground, 3901 TERRACE ST, 19128
297. Wissinoming Park, 5801 FRANKFORD AVE, 19135
298. Wister Playground, 4971 BAYNTON ST, 19144
299. Wisters Woods Park, 1998 BELFIELD AVE, 19141
300. Woodside Park, 3918 CONSHOHOCKEN AVE, 19131

VERIFICATION OF VAL W. FINNELL

I, Val W. Finnell, hereby state that I am Pennsylvania Director of Gun Owners of America, Inc, an organizational plaintiff in this action, and declare as follows: I have reviewed this Complaint, and all statements and information contained within are true and correct to the best of my knowledge, information, and belief. Further, I understand that the statements in this Complaint are subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Val W. Finnell
Pennsylvania Director
Gun Owners of America, Inc.

DATED: 9/27/2022