

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BENJAMIN HEETER, et al.,

Plaintiffs,

v.

LETITIA JAMES, et al.,

Defendants.

DECLARATION OF LOGAN REECE

Civil Action No.:

No. 1:24-cv-00623-JLS-HKS

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am employed as a Chief Operating Officer (COO) for Armored Republic Holdings LLC (“Armored Republic”), a company that manufactures and sells body armor products across the United States.

2. I submit this Declaration on behalf of Armored Republic in support of its motion for leave to file an amicus brief in support of Plaintiffs’ Motion for Summary Judgment.

3. Armored Republic exists to provide free men with tools of liberty to defend their God-given rights. Founded in Arizona, Armored Republic exists to serve citizens who take seriously the call to protect life, liberty, and truth. We specialize in body armor systems, plate carriers, and defensive gear engineered for those who refuse to outsource their responsibility of protection.¹

¹ See Armored Republic, *About Us*, <https://www.ar500armor.com/about-armored-republic-2/>.

4. To promote the republican civic virtue of citizen soldiers being prepared and equipped to resist tyrants and criminals, Armored Republic has become the top provider of body-armor products to American civilians.

5. As an expression of its commitment to constitutional ordered liberty under a republican form of government, Armored Republic's company motto is "No King But Christ."

6. Since 2012, Armored Republic has sold to American civilians over 2.5 million products that constitute "body armor" within the meaning of the New York regulations that Plaintiffs challenge.

7. Armored Republic's interests in this matter are: (1) promoting the ability of all American citizens in all states, not just select professionals, to acquire body armor to be prepared to defend their God-given liberties; (2) ensuring it can make sales to customers in all 50 states; and (3) promoting an historically-informed understanding of the original meaning of the Second Amendment that includes the full scope of liberties that the amendment protects, including the right to acquire defensive armor.

8. Armored Republic manufactures and sells a variety of body armor products for lawful civilian use. These products include hard armor plates, plate carrier vests, soft body armor, trauma pads, fragmentation wraps, armored backpacks, and ballistic helmets (collectively, "Body Armor Products").

9. Hard armor plates are plates made from steel alloy, ceramic, polyethylene, or a combination of those materials, that are inserted into a plate

carrier vest or otherwise worn over the front, back, and/or sides of a person's chest and/or torso to protect the wearer against gunfire, shrapnel, and other projectiles.

10. Plate carrier vests are vests worn over a person's chest and/or torso and which feature one or more compartments to hold hard armor plates or soft armor inserts to cover the front, back, and/or sides of a person's chest and/or torso area for the purpose of protecting against gunfire, shrapnel, and other projectiles. Plate carrier vests by themselves do not provide ballistic protection but are intended to provide such protection when coupled with hard armor plates or soft armor inserts. Plate carrier vests may be sold separately from hard armor plates and/or soft armor inserts, sold in a bundle along with such plates or inserts, or sold with such plates or inserts integrated into the vest.

11. Soft body armor refers to body armor made from soft and pliable high-strength aramid fiber materials such as Kevlar. Soft body armor generally provides less protection than hard body armor but is generally much lighter and more flexible. Soft body armor can take the form of concealable vests to be worn under clothing, external vests with integrated soft armor pieces, or inserts to be placed in plate carrier vests or in backpacks. As with hard armor plates, soft body armor is designed to protect the wearer against gunfire, shrapnel, and other projectiles.

12. Trauma pad refers to a soft, often non-Newtonian, material pad that is inserted in a plate carrier vest between a hard armor plate and the face of the wearer's body. The purpose of a trauma pad is to protect the wearer against gunfire, shrapnel, and other projectiles by mitigating back-face deformation of the hard

armor plate upon impact and reducing the amount of force transferred to the wearer.

13. Fragmentation wrap refers to a fitted aramid fiber envelope that is wrapped over a hard armor plate while it is inserted into a plate carrier vest or otherwise worn over a person's chest, sides, and/or torso. The purpose of fragmentation wrap is to protect the wearer against gunfire, shrapnel, and other projectiles by mitigating the otherwise potentially injurious spalling and fragmentation that can result when a hard armor plate is hit by a projectile.

14. Armored backpacks are backpacks that include either a hard armor plate or soft armor insert integrated or inserted into the side of the backpack that rests against the back and shoulders of the individual who wears the backpack. The purpose of an armored backpack is to protect the wearer against gunfire, shrapnel, and other projectiles.

15. Ballistic helmets are helmets worn over the top and/or sides of an individual's head. Ballistic helmets are generally made from hard, ballistic-resistant materials such as metal alloys, polyethylene, ceramic, and/or woven aramid fibers. The purpose of ballistic helmets is to protect the wearer from gunfire, shrapnel, and other projectiles.

16. Armored Republic has been manufacturing and selling Body Armor Products since 2012 and has sold over 2,500,000 Body Armor Products to private Americans (i.e. civilians), either directly or through dealers.

17. I have been employed with Armored Republic since at least 2020.

18. Armored Republic's sales database is based on the company's e-commerce platform which records every sales transaction for the company. The company has enterprise resource planning (ERP) software that is used to interface with the sales database in order to review, manage, and run queries on the company's inventory and sales data.

19. In the course and scope of my employment, I frequently and regularly access and monitor Armored Republic's ERP software and/or sales database.

20. I have direct personal knowledge of Armored Republic's ERP and/or sales database and how entries of sales are and have been recorded in that database.

21. Armored Republic's sales database is a business record created from regularly compiled records generated from sales of Armored Republic's products, including body armor products.

22. The sales database is maintained in the regular course of Armored Republic's business.

23. While there may be sales of Armored Republic products that are not reflected in the sales database, to the best of my knowledge, there are no entries in the sales database that are not based on actual sales of products made by Armored Republic. The only exception to this may be certain test entries made for purposes of confirming system operation and accuracy, but the number of these test entries, to the best of my knowledge, is less than 20 total since 2012.

24. Entries in Armored Republic's sales database are organized in such a way that they can be queried and can accurately be broken down by order, by product, by purchaser, by date, and by address.

25. To the best of my knowledge, the data recorded on Armored Republic's sales database is an accurate and trustworthy record of its sales since 2012.

26. Armored Republic sells body armor products in the United States through three different avenues: a) directly to private individuals via direct online and onsite sales; b) sales to dealers who in turn sell to private individuals via retail sales; and c) direct sales to governmental agencies and departments.

27. Armored Republic's sales database captures sales data for each of these three categories of sales.

28. On April 3, 2026, I accessed the Armored Republic sales database and ran queries to ascertain various data parameters reflecting AR's sales of body armor products since 2012, querying such records as of April 3, 2026.

29. Based on my observations and assessments from the queries I ran on the database ERP system for records as of April 3, 2026, I found that the following figures were true and accurate to the best of my knowledge with respect to AR's sale of body armor products since 2012:

Total number of Body Armor Products sold directly to private

Americans: 2,507,396

Hard Armor Plates: 1,236,777

Soft Armor: 102,262

Trauma Pads: 621,850

Fragmentation Wraps: 12,321

Armored Backpacks: 26,670

Ballistic Helmets: 5,973

Carriers: 501,543

Total Number of Body Armor Products sold to dealers who in turn sold to private Americans: 313,162

Hard Armor Plates: 191,847

Soft Armor: 100,623

Trauma Pads: 597,430

Fragmentation Wraps: 10,461

Armored Backpacks: 25,435

Ballistic Helmets: 5528

Carriers: 474,871

Total number of Body Armor Products sold to governmental agencies and departments in the United States: 42,490

Hard Armor Plates: 25,444

Soft Armor: 2,344

Trauma Pads: 6,436

Fragmentation Wraps: 39

Armored Backpacks: 68

Ballistic Helmets: 1,443

Carriers: 7,716

Total number of Body Armor Products sold directly to private individuals in New York State before July 6, 2022: 59,673

Hard Armor Plates: 29,533

Soft Armor: 3,038

Trauma Pads: 14,294

Fragmentation Wraps: 0

Armored Backpacks: 536

Ballistic Helmets: 172

Carriers: 12,272

Total number of Body Armor Products sold to dealers in New York State before July 6, 2022: 2,337

Hard Armor Plates: 1,015

Soft Armor: 489

Trauma Pads: 202

Fragmentation Wraps: 0

Armored Backpacks: 27

Ballistic Helmets: 20

Carriers: 584

30. Prior to July 6, 2022, approximately 2.8% of Armored Republic's sales were to New York residents, based on data from Armored Republic's sales database.

31. I declare under penalty of perjury that the foregoing is true and accurate.

Executed this 6th day of April, 2026.

Logan Reece
Logan Reece (Apr 6, 2026 10:49:10 PDT)

Logan Reece