

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

FEDERAL FIREARMS LICENSEES OF ILLINOIS, an Illinois not-for-profit corporation; GUNS SAVE LIFE, an Illinois not-for-profit corporation; GUN OWNERS OF AMERICA, a California non-stock corporation and a not-for-profit membership organization; GUN OWNERS FOUNDATION, a Virginia non-stock corporation and a not-for-profit legal defense and educational foundation; PIASA ARMORY, a Missouri corporation; DEBRA CLARK, a resident of Cumberland County, Illinois; JASMINE YOUNG, a resident of Madison County, Illinois; and CHRIS MOORE, a resident of Hardin County, Illinois,

Plaintiffs,

v.

JAY ROBERT "J.B." PRITZKER, in his official capacity as Governor of the State of Illinois; KWAME RAOUL, in his official capacity as Attorney General of the State of Illinois; and BRENDAN F. KELLY, in his official capacity as Director of the Illinois State Police,

Defendants.

Case No. 3:23-CV-215-SPM

DECLARATION OF ERICH PRATT

1. My name is Erich M. Pratt. I am a U.S. citizen and resident of Virginia. I make this declaration in support of Plaintiffs' Complaint for Declaratory and Injunctive Relief. Unless otherwise stated, I make this declaration based on personal knowledge. If called as a witness, I can testify to the truth of the statements contained herein.

2. I am the Senior Vice President of Gun Owners of America, Inc. (“GOA”), and the Senior Vice President of Gun Owners Foundation (“GOF”).

3. In that capacity, I oversee staff that is in daily contact with members and supporters regarding their concerns, questions, requests, and suggestions on how GOA and GOF can best represent their interests.

4. Gun Owners of America, Inc. is a California non-stock corporation with its principal place of business at 8001 Forbes Place, Springfield, VA 22151. GOA is organized and operated as a non-profit membership organization that is exempt from federal income taxes under Section 501(c)(4) of the U.S. Internal Revenue Code. GOA was formed in 1976 to preserve and defend the Second Amendment rights of gun owners. GOA has more than 2 million members and supporters across the country, including residents of this district, many of whom will be irreparably harmed by Illinois’ new Firearms Ban.

5. Gun Owners Foundation is a Virginia non-stock corporation, with its principal place of business at 8001 Forbes Place, Springfield, VA 22151. GOF is organized and operated as a non-profit legal defense and educational foundation that is exempt from federal income taxes under Section 501(c)(3) of the U.S. Internal Revenue Code. GOF is supported by gun owners across the country, including residents of this district, many of whom will be irreparably harmed by Illinois’ new Firearms Ban.

6. Since the passage of the Illinois Firearms Ban, and as it was being considered, the overwhelming concern of our members and supporters in Illinois has been the effect of the new law on their ability to sell, buy, repair, modify, possess, and use the firearms, parts, accessories, that are now banned or otherwise restricted.

7. Our members desire and overwhelmingly support GOA and GOF’s involvement in litigation to protect the rights which are being unconstitutionally infringed by the Firearms Ban.

8. GOA and GOF together have more than two million members and supporters nationwide, including thousands who are Illinois residents, including within this district and within Franklin County and the Southern District.

9. Many of these individuals have been and are being irreparably harmed by the Firearms Ban.

10. GOA and GOF exist to preserve and defend the Second Amendment rights of gun owners. GOA and GOF routinely litigate cases across the country in furtherance of their mission, on behalf of their members and supporters in various states.

11. Many of GOA and GOF's members and supporters are law-abiding residents of Illinois, and reside in this district, who have no disqualification which would prevent them from purchasing or possessing firearms.

12. Many of these members and supporters wish to sell, purchase, and possess the firearms now prohibited by the Firearms Ban. In other words, members and supporters of GOA and GOF residing in Illinois and this district are adversely affected by the Firearms Ban and are representative of others affected by the Firearms Ban, which has a sweeping negative and infringing effect on the individual members and supporters of GOA and GOF, and all Illinois gun owners.

13. GOA and GOF's members and supporters within Illinois and this district have been and are being irreparably harmed, in that their constitutional rights to keep and bear arms are being violated by the Illinois Firearms ban.

14. Protection of the rights and interests advanced in the Complaint are germane to GOA/GOF's mission, which is to preserve and protect the Second Amendment and the rights of Americans to keep and bear arms, including against bureaucratic overreach.

15. Because the Illinois Firearms ban affects many similarly situated persons who are GOA and GOF members and supporters, GOA and GOF can fully and faithfully represent their members' and supporters' interests without the necessity to include each individual

member or supporter in this litigation.

16. If the Firearms Ban is not enjoined, our members' and supporters' Second Amendment rights will be significantly curtailed.

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

Dated: February 6, 2023



Erich M. Pratt

Prepared By:

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