

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

FEDERAL FIREARMS )  
LICENSEES OF ILLINOIS, *et al.*, )  
 )  
Plaintiffs, )  
 )  
vs. )  
 )  
JAY ROBERT "J.R." PRITZKER, *et al.*, )  
 )  
Defendants. )

Case No. 3:23-215-SPM

DECLARATION OF DEBRA CLARK

I, DEBRA CLARK, being first duly sworn upon oath, state the following:

1. I make this Declaration in support of the actions being taking in this matter to challenge 720 ILCS 5/24-1.9, et seq. ("Illinois' Firearms Ban Act");

2. I have personal knowledge of the allegations contained in this Declaration and, if called to testify at a hearing and/or trial in this matter, will competently testify to the allegations contained in this Declaration;

3. I am over 21 years of age;

4. I am a citizen and resident of the State of Illinois, the United States of America and this judicial district;

5. I am a law-abiding individual and legally eligible under state and federal laws to acquire, maintain, modify, possess, purchase, repair, sell, supply and/or transfer to others, transport and/or travel freely with, and/or use firearms, firearms attachments and/or firearms parts;

6. I am a part owner of a federally licensed firearms dealer, which operates its principal place of business in the State of Illinois, and in this judicial district;

7. In my capacity as a part owner of a federally licensed firearms dealer, it is my belief that Illinois' Firearms Ban Act threatens the viability of my business and threatens my personal arrest and possible felony conviction for engaging in the very business and/or personal activities that was 100% lawful in the State of Illinois a little more than one month ago;

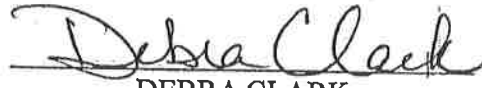
8. In my capacity as a part owner of a federally licensed firearms dealer, I am concerned that Illinois' Firearms Ban Act curtails and/or restricts, if not outright bans the abilities of my customers and/or me from acquiring, maintaining, modifying, possessing, purchasing, repairing, selling, supplying and/or transferring to others, transporting and/or travelling freely with, and/or using the firearms, the attachments and/or parts banned by Illinois' Firearms Ban Act and, therefore, I am now considering closing my business;

9. In my capacity as a part owner of a federally licensed firearms dealer, I am concerned that my business and I will be irreparably harmed, more specifically, by the ban on sales, because my company sells the commonly used, banned firearms, attachments and/or parts which make up a significant portion of their sales, like the AR-15 rifles which my customers and I desire to acquire for recreational use and personal protection, resulting in my dealership potentially being driven out of business if Illinois' Firearms Ban Act is implemented and enforced;

10. My business and I have no plain, speedy and adequate remedy at law to fully redress the continued violation of our civil and constitutional rights caused by Illinois' Firearms Ban Act; and

FURTHER DECLARANT SAYETH NAUGHT.

I, DEBRA CLARK, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct.

  
DEBRA CLARK

**Prepared By:**

**Mark L. Shaw (IL Bar No. 6198478)**

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