

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

DANE HARREL, an individual and resident of St. Clair County, Illinois;

C4 GUN STORE, LLC, an Illinois limited liability company;

MARENGO GUNS, INC., an Illinois corporation;

ILLINOIS STATE RIFLE ASSOCIATION;

FIREARMS POLICY COALITION, INC.; *and*

SECOND AMENDMENT FOUNDATION,
Plaintiffs,

v.

KWAME RAOUL, in his official capacity as Attorney General of Illinois;

BRENDAN F. KELLY, in his official capacity as Director of the Illinois State Police;

JAMES GOMRIC, in his official capacity as State's Attorney of St. Clair County, Illinois;

JEREMY WALKER, in his official capacity as State's Attorney of Randolph County, Illinois;

PATRICK D. KENNEALLY, in his official capacity as State's Attorney of McHenry County, Illinois;

RICHARD WATSON, in his official capacity as Sheriff of St. Clair County, Illinois;

JARROD PETERS, in his official capacity as Sheriff of Randolph County, Illinois;

ROBB TADELMAN, in his official capacity as Sheriff of McHenry County, Illinois;

Defendants.

No. 3:23 CV 141-SPM

**DECLARATION OF
ALAN M. GOTTLIEB**

DECLARATION OF ALAN M. GOTTLIEB

I, Alan M. Gottlieb, am competent to state, and declare and certify the following based on the best of my personal knowledge and belief:

1. I am the Founder and Vice-President of the Second Amendment Foundation (“SAF”).

2. SAF is a non-profit membership organization incorporated under the laws of Washington with its principal place of business in Bellevue, Washington. SAF has over 650,000 members and supporters nationwide, including thousands in Illinois. The purposes of SAF is to promote the Second Amendment rights of its members, which is done through methods which include education, research, publishing and legal action focusing on the Constitutional right to privately own and possess firearms, and the consequences of gun control.

3. SAF has individual members and supporters who are Illinois residents and are adversely impacted by Illinois’s Firearm Ban as defined in 720 ILCS 5/24-1.9 and Magazine Ban as defined in 720 ILCS 5/24-1.10. These include Dane Harrel, the individual Plaintiff in this case, Christopher Brooks, the owner and Member/Manager of C4 Gun Store, LLC, and Dominic DeBock, the owner and President of Marengo Guns, Inc. SAF brings this action to vindicate the rights of its members.

4. But for the criminal enactments cited in the pending Complaint, SAF members who wish to purchase and possess banned firearms and magazines either banned outright under the Illinois law, or which have their usage severely restricted and subject to registration, would purchase and possess such firearms and magazines for their own defense, but they refrain from doing so due to fear of arrest, prosecution, fine and incarceration.

5. Additionally, because the Bans have destroyed the legal market for such

magazines and firearms in Illinois, the affected SAF members cannot exercise their Second Amendment rights by purchasing and using these commonly possessed firearms and magazines.

FURTHER DECLARANT SAYETH NAUGHT.

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

Executed this 25th day of January, 2023.

A handwritten signature in blue ink that reads "Alan M. Gottlieb". The signature is written in a cursive style with a horizontal line underneath it.

Alan M. Gottlieb