

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,*

Case No. 3:23 CV 141-SPM

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;

**DECLARATION OF**  
**CHRISTOPHER A. BROOKS**

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.*

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**DECLARATION OF CHRISTOPHER A. BROOKS**

I, Christopher A. Brooks, hereby declare under penalty of perjury, that the following information is true to the best of my knowledge and state the following:

1. I am over 18 years old. I am competent to give this declaration. I am providing this declaration based on my personal knowledge and experience.

2. I am a citizen of the United States, and a resident and citizen of the State of Illinois, currently residing in Sparta, Randolph County.

3. I am the sole Member and Manager of C4 Gun Store, LLC, an Illinois limited liability company with its principal place of business in Sparta, Randolph County, Illinois. C4 Gun Store, LLC is a federally licensed firearm dealer.

4. I am also a law-abiding individual, and am legally eligible under federal and state law to possess and acquire firearms. I am a member of Plaintiffs Illinois State Rifle Association (“ISRA”), Firearms Policy Coalition, Inc (“FPC”), and Second Amendment Foundation (“SAF”)

5. Until the Firearm and Magazine Bans that are the subject of this suit went into effect, C4 Gun Store, LLC sold both noncompliant magazines and banned firearms, but because of the Bans, C4 Gun Store, LLC has been forced to cease such sales almost entirely.

6. If it were not for the Bans, I would acquire and sell noncompliant magazines and banned firearms to customers who wished to possess such magazines and firearms for lawful purposes and to exercise their Second Amendment rights.

7. However, because I fear arrest, criminal charges, prosecution, fines and/or incarceration by Defendants under the challenged laws, and because the Bans have destroyed the legal market for such magazines and firearms in Illinois, I cannot permit my customers to

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 24th day of January, 2023.

A handwritten signature in black ink, appearing to read "Christopher A. Brooks". The signature is written in a cursive style with a large initial "C" and "A".

Christopher A. Brooks