

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.*

Case No. 3:23 CV 141-SPM

**DECLARATION OF DANE HARREL**

\_\_\_\_\_



**DECLARATION OF DANE HARREL**

I, Dane Harrel, 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 O'Fallon, St. Clair County. I am a retired Lieutenant Colonel in the United States Air Force, and am currently employed as a civil servant for the USAF Air Mobility Command Headquarters in the Operations Directorate.

3. 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").

4. I own semiautomatic firearms and magazines that are subject to the challenged Bans, and since the Bans have gone into effect I have been subject to the use restrictions and registration requirement associated with the Bans.

5. If it were not for the Bans, I would acquire additional noncompliant magazines as necessary as well as additional semiautomatic firearms that are now banned, including a Ruger Mini-14 and a Springfield Armory M1A.

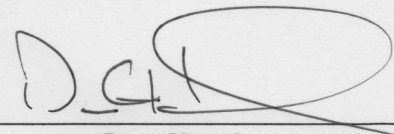


6. However, because I fear arrest, criminal charges, prosecution, fines and/or incarceration by Defendants under the challenged laws, and because the Bans have destroyed the legal market for such magazines and firearms in Illinois, I cannot exercise my Second Amendment rights by purchasing and using 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 "D. Harrel", written over a horizontal line.

Dane Harrel