

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

CALEB BARNETT, et al.,)
)
 Plaintiffs,)
)
 vs.) **Case No. 3:23-cv-209-SPM**
)
 KWAME RAOUL, et al.,)
)
 Defendants.)

DANE HARREL, et al.,)
)
 Plaintiffs,)
)
 vs.) **Case No. 3:23-cv-141-SPM**
)
 KWAME RAOUL, et al.,)
)
 Defendants.)

JEREMY W. LANGLEY, et al.,)
)
 Plaintiffs,)
)
 vs.) **Case No. 3:23-cv-192-SPM**
)
 BRENDAN KELLY, et al.,)
)
 Defendants.)



STATEMENT PURSUANT TO 28 USC 1746

1. My name is Matthew Wilson, I am a Plaintiff in this case, a U.S. Citizen, am over 21 years of age, under no legal disabilities, and make this sworn statement under personal knowledge.
2. I reside in Crawford County, Illinois. Since this ban on firearms and magazines was passed, retailers in my area have stopped selling these items, even items that I think are legal under the act the retailers are afraid to sell, as they are not sure what is actually legal under the Act. Some retailers claim to have been told that literally screwdrivers are prohibited under the act.
3. I am a lifetime firearm owner, and am familiar with most kinds of common firearms and magazines.
4. The 1919 Browning series traditionally uses cloth belts like those shown in the motion, both for 1919s in the original machinegun version, as well as later rifle and “other” versions.
5. Some 1919s, including the rifle configuration and the other configuration, use more modern disintegrating links, instead of a cloth belt.
6. I personally own at least one rifle that uses the same magazine as at least one pistol I own uses. The magazines for the rifle and the pistol are made by the same company, and are indistinguishable from either other, as they are identical.
7. I am familiar with the Mossberg Blaze 47, having personally seen one for sale. It is a blowback operated .22 LR caliber rimfire, with nothing in common with an actual Ak47, other than the general shape of its shadow on a sunny day.

8. Models of firearms I can think of off hand, which use magazines that can be and commonly are used in both rifles and pistols, as well as “other” firearms, are AK47 type magazines, AR15 type magazines, Luger magazines, 1911 magazines, Smith and Wesson 59 magazines, Ruger 10-22 magazines, Soviet PPS43 type magazines, Uzi type magazines, and Thompson model 1928 type magazines.
9. There is no objective way that a person can determine that any ammunition feeding device is for a rifle, shotgun, pistol or other firearm, without knowing its design history, possibly going back well over a century, and without knowing about every single firearm ever made that might use that assumption feeding device.
10. Likewise, there are no objective standards to determine whether a given firearm is an AK type, an AR type, or something else. In fact, even the listed examples are often times not within the parameters of what even most firearms experts would consider to be an AK type, like the SKS, of an AR type.
11. That I have read the Plaintiff’s Motion for Partial Summary Judgment as to Counts IV and VI, and to the best of my knowledge, the facts set forth in this sworn statement, and in that motion, are true and correct. The photographs depicted show what they are labeled as correctly, and the descriptions contained in the motion are accurate.
12. If I were to testify in open court, I would testify consistently with this affidavit.
13. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 5-19-23



Matthew Wilson

Handwritten signature or initials.

Handwritten text, possibly a date or reference number.