

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 designated Lead Case  
KWAME RAOUL, et al., )  
Defendants. )

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

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

FEDERAL FIREARMS )  
LICENSEES OF ILLINOIS, et al., )  
Plaintiffs, )  
vs. ) Case No. 3:23-cv-215-SPM  
JAY ROBERT "JB" PRITZKER, et al., )  
Defendants. )

**SUPPLEMENTAL DECLARATION OF SCOTT PULASKI**

Comes now Scott Pulaski, and submits this declaration, pursuant to 28 U.S.C. 1746, and states same is true and correct,

1. My name is Scott Pulaski. I make this supplemental affidavit in response to the "Second Supplemental Declaration of James E. Yurgealitis.

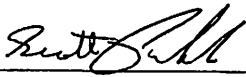
2. Mr. Yurgealitis says, in his Second Supplemental Affidavit (Doc. 124-3) that he does not “believe” that the addition of parts or accessories to a rifle in order for it to accept a different kind of magazine renders such magazines interchangeable.
3. Whether Mr. Yurgealitis believes it, or not, it has long been common that rifles and pistols use identical ammunition, such as Colt revolvers and Winchester rifles using the same ammunition during the “Old West” period of time.
4. Using the same magazines is the same basic function.
5. Whether a given rifle, pistol, shotgun or other firearm uses the same magazine as another class of firearm is, again, common, such as Glock pistols using the exact same magazines as certain rifles, or Smith and Wesson M&P pistols using the exact same magazines as certain rifles.
6. The fact that, for instance, a Kel Tec rifle can, with a few minor, factory made, and inexpensive parts, be used to make a Kel Tec rifle accept a CZ75 pistol Type magazine, not does make that magazine any more or less interchangeable between rifles and pistols. The CZ75 magazine will still fit Kel Tec Sub 2000 Gen 2 rifles that actually exist and are actually owned by U.S. citizens, using rifles assembled totally with factory Kel-Tec parts.
7. Likewise, as far as “out of production” firearms goes, there are literally hundreds of millions of out of production firearms in the United States today, including the very Smith and Wesson Model 5900 series alluded to by Mr. Yurgealitis, in his prior affidavit. Many of these out of production firearms use magazines.
8. Magazines are a wear item, and tend to wear out, or get lost, much more often than firearms in general. Thus, as far as replacements go, magazines for old, obsolete and/or out of production firearms remain, largely, in production and available. For instance,

and function in a large number of rifles, some new, some old, some in production, and some collector's items, but all of which are on the commercial market today.

16. Likewise, it is impossible to discern whether a given more than 15 round magazine, that fits no known "rifles" handguns or shotguns is legal. For instance, a FIAT Revelli, of the early 20<sup>th</sup> Century, used a magazine that was unique to it, and of which no shoulder fired variants are known to have been manufactured, and which no handgun variants were manufactured. The magazines themselves, even absent the firearms, are sought as collectables by cartridge and militaria collectors. From PICA, I am unsure if these magazines are legal, or not.

FURTHER SAYETH NAUGHT.

Dated: 10/17/23



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Scott Pulaski