

DECLARATION OF ERICH M. PRATT

I, Erich Pratt, declare as follows:

1. I am the Senior Vice President of Gun Owners of America, Inc. (“GOA”), and the Senior Vice President of Gun Owners Foundation (“GOF”); both are Plaintiffs in this action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. GOA is a California non-stock corporation and a not-for-profit membership organization with its principal place of business in Springfield, Virginia, exempt from federal income taxes under Section 501(c)(4) of the U.S. Internal Revenue Code. GOA was formed in 1976 to preserve and defend the Second Amendment rights of gun owners. GOA has more than 2 million members and supporters across the country, including residents within this judicial district.

3. GOF is a Virginia non-stock corporation and a not-for-profit legal defense and educational foundation with its principal place of business in Springfield, Virginia, exempt from federal income taxes under Section 501(c)(3) of the U.S. Internal Revenue Code. GOF was formed in 1983 and is supported by gun owners across the country, including within this judicial district.

4. While GOA and GOF are national organizations, we try to keep our members and supporters apprised of developments in various states pushing onerous new gun control laws, particularly when we are involved in litigation challenging those laws, as is the case here. Invariably, GOA and GOF receive questions and concerns from our members and supporters regarding how laws like the Illinois registration requirement may affect them, and we do our best to answer such questions.

5. We are informed that the Illinois State Police are still revising the rules implementing registration under the challenged statute, and has submitted revisions to the Illinois Joint Committee on Administrative Rules (“JCAR”) for review. Even if JCAR adopts new rules by December 12, 2023, and those rules address every concern held by GOA and GOF members

and supporters pertaining to the registration of vaguely-described banned items, that would leave mere days for GOA and GOF to attempt to notify their members and supporters of the new rules so they can comply with the registration deadline. Worse, this is during the holiday season, when people are traveling and naturally less focused on emails and other efforts at communication. What is more, many GOA and GOF members and supporters are military service members. Many are deployed overseas. For such persons, who reside in Illinois, compliance with the challenged provisions by January 1, 2024 might be altogether impossible.

6. GOA and GOF have thousands of members and supporters in Illinois, many of whom are subject to the registration requirement because they own or may own firearms or parts that may have to be registered (depending on which interpretation of the law is adopted in any guidance publication). GOA and GOF members and supporters will continue to be adversely affected by these vague rules that continue to be created and modified just weeks before the registration deadline.

7. There is also no way for GOA and GOF to notify all of our members and supporters, let alone all Illinois residents, who may be affected by the challenged statutes. While I would love it if all our emails were opened and read, that is never the case. Thus, any claim that all of our members and supporters are somehow provided actual notice, simply because we have attempted to communicate with them about the challenged provisions, is false. Nevertheless, and despite the vagueness issues and lack of clarity in the challenged provisions, GOA and GOF have sent out emails, given media interviews, and sought to reach their members and the general public via other platforms, regarding the challenged provisions.

I declare under penalty of perjury that the foregoing is true and correct. Executed within the United States on December 6, 2023.



Erich M. Pratt
Declarant