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

CALEB BARNETT, BRIAN NORMAN,
HOOD’S GUNS & MORE, PRO GUN AND
INDOOR RANGE, and NATIONAL
SHOOTING SPORTS FOUNDATION,
INC.,

Plaintiffs,

v.

KWAME RAOUL, Attorney General of
Illinois, and BRENDAN F. KELLY,
Director of the Illinois State Police,

Defendants.

Case No. 3:23-cv-209-SPM

Declaration of Lawrence G. Keane
on Behalf of Plaintiff National Shooting Sports Foundation

I, Lawrence G. Keane, hereby declare as follows:

1. I am over the age of 18 years, and I am qualified to submit this declaration on behalf of the National Shooting Sports Foundation (“NSSF”).

2. I am the Senior Vice President, Assistant Secretary, and General Counsel to NSSF, which is headquartered in Shelton, Connecticut. I joined NSSF in 2000 and am responsible for its legal, governmental relations, public affairs and risk management functions.

3. I have personal knowledge of the facts set forth in this declaration through direct involvement and by personally reviewing NSSF records and information.

4. Formed in 1961, NSSF is a Connecticut non-profit, tax exempt, non-stock corporation with its principal place of business in Connecticut.

5. NSSF is the trade association for the firearm, ammunition, hunting, and shooting sports industry. It has a membership of more than 10,000 throughout the United States (including more than 290 in Illinois), including federally licensed manufacturers, distributors, and retailers of firearms, ammunition, ammunition feeding devices, and related products; businesses that manufacture, distribute, and sell other shooting, hunting and personal protection related goods and services; sportsmen’s organizations; endemic media publishers and public and private shooting ranges.

6. NSSF’s mission is to promote, protect, and preserve hunting and the shooting sports by providing leadership in addressing industry challenges, advancing participation in and understanding of hunting and the shooting sports, reaffirming and strengthening its members’ commitment to the safe and responsible sale and use of their products, and promoting a political

environment supportive of America's traditional hunting and shooting heritage and firearm freedoms.

7. NSSF's members, and the ammunition and firearm industry as a whole, account for and provide more than 384,000 jobs in the United States, and have an overall annual economic impact of more than \$90 billion. More than 63 million hunters and target shooters in America purchase and use traditional ammunition containing lead components.

8. The Protect Illinois Communities Act, House Bill 5471 ("HB 5471"), bans or otherwise restricts NSSF members' possession, sale, purchase, and transfer of firearms now defined as "assault weapons" under Illinois law. 720 ILCS 5/24-1.9.

9. HB 5471 also bans or otherwise restricts NSSF members' possession, sale, purchase, and transfer of standard-capacity magazines now defined as "large capacity ammunition feeding devices" under Illinois law. 720 ILCS 5/24-1.10.

10. HB 5471 constricts the consumer market for NSSF members, including but not limited to Illinois retailers like Plaintiff Hood's Guns & More and Plaintiff Pro Gun and Indoor Range, which are NSSF members. *See* Decl. of J. Hood; *see also* Decl. of P. Smith. Such constriction has resulted and will result in reduced sales and loss of business for NSSF members in and out of Illinois. It also is likely to result in a loss of NSSF membership dues, which will negatively impact NSSF itself.

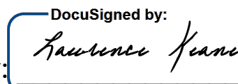
11. Unless it is enjoined, HB 5471's ban on further production, distribution, and sale of commonly purchased and used firearms now defined as "assault weapons" and standard magazines now defined as "large capacity ammunition feeding devices" will require (at great cost) manufacturers of those products to re-design or re-tool their products for sale in Illinois,

repurchase and re-direct equipment or product as needed, and significantly change their internal processes with respect to activities within Illinois.

12. Absent an injunction, NSSF and its members have experienced and will continue to experience irreparable injury in the form of lost business, increased costs, and radically changed market conditions in Illinois.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of July 2024.

By: 
 DocuSigned by:
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Lawrence G. Keane