

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

CALEB BARNETT, et al., )  
Plaintiffs, ) Case No. 3:23-cv-209-SPM  
 ) \*\*designated Lead Case

v. )

KWAME RAOUL, et al., )  
Defendants, )

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

v. )

KWAME RAOUL, et al., )  
Defendants, )

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

v. )

BRENDAN KELLY, et al., )  
Defendants, )

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**FEDERAL FIREARMS LICENSEES OF** )  
**ILLINOIS, et al.,** ) **Case No. 3:23-cv-215-SPM**  
**Plaintiffs,** )

v. )

**JAY ROBERT “J.B.” PRITZKER, et al.,** )  
**Defendants.** )

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**DECLARATION OF PLAINTIFF CHRIS MOORE**

1. I, Chris Moore, am a Plaintiff in the above-titled action. I am over the age of 18 and I make this declaration of my own knowledge, except as to any matters stated therein on information and belief, and as to such matters I believe them to be true. If called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am currently a resident of the State of Illinois and have been one since before January 10, 2023.

3. I am not a police officer, retired police officer, prison warden, current member of the armed forces or national guard, nor do I work in armed security or private security contracting. I am thus not exempt from Protect Illinois Communities Act, House Bill 5471 (“PICA”)’s restrictions.

4. I lawfully possess multiple firearms and ammunition feeding devices suitable for defensive and other lawful purposes within Illinois.

5. Prior to January 10, 2023, I lawfully possessed at least one semiautomatic rifle with a detachable magazine and a pistol grip, adjustable stock, barrel shroud, and flash suppressor in Illinois, which I used for lawful purposes, including defense.

6. I wish to lawfully acquire and possess within Illinois at least one new:
- a. semiautomatic rifle with a detachable magazine and a pistol grip, adjustable stock, barrel shroud, and flash suppressor, such as a Bravo Company Mid 16 MOD 0, chambered in 5.56 NATO, or similar AR-style semiautomatic rifle;
  - b. semiautomatic pistol with a detachable magazine and threaded barrel; and
  - c. semiautomatic shotgun with a pistol grip and either a detachable magazine or an internal magazine with a capacity of over 5 rounds.

7. PICA has injured me by precluding me from lawfully:
- a. maintaining possession within Illinois of the semiautomatic rifle with a detachable magazine and pistol grip, adjustable stock, barrel shroud, and flash suppressor that I lawfully own and possessed in Illinois prior to January 10, 2023, without having timely submitted an endorsement affidavit for (i.e., registered) that rifle, which I refused to submit, thus rendering me unable to lawfully possess and use it within Illinois;
  - b. acquiring and possessing any of the firearms identified in Paragraph 5,

above, which I wish to acquire, possess, and use in Illinois;


- c. using any of the firearms identified in subsections (a) and (b) of this paragraph, for any lawful purpose.

8. But for fear of prosecution under PICA for doing so, I would engage in each of the activities described in the preceding paragraph. Specifically, I would lawfully:

- a. possess and use in Illinois the semiautomatic rifle with a detachable magazine and a pistol grip, barrel shroud, adjustable stock, and flash suppressor that I lawfully possessed and used in Illinois prior to January 10, 2023;
- b. acquire and possess each of the firearms identified in Paragraph 5, above;
- c. maintain in my home or farm property in Illinois for self-defense purposes each of the firearms identified in Paragraph 5, above;
- d. train and target-shoot with, and instruct my wife on how to defensively use, a semiautomatic rifle with a detachable magazine and a pistol grip, barrel shroud, adjustable stock, and flash suppressor;
- e. train, target shoot, and compete with a semiautomatic pistol with a detachable magazine and a threaded barrel;
- f. train and target shoot with a semiautomatic shotgun with a pistol grip and either a detachable magazine or an internal magazine with a capacity of over 5 rounds;
- g. carry on my farm property for self-defense, depredation, and hunting a semiautomatic rifle with a detachable magazine and a pistol grip, barrel shroud, adjustable stock, and flash suppressor, or a semiautomatic shotgun with a pistol grip and either a detachable magazine or an internal magazine with a capacity of over 5 rounds;

9. I have a valid concealed carry license, issued by the State of Illinois.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on July 12, 2024, in Cave-in-Rock, Illinois.



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Chris Moore  
Declarant

**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2024, an electronic PDF of **DECLARATION OF PLAINTIFF CHRIS MOORE** was sent by electronic mail to the following registered attorneys participating in the case:

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Dated: July 12, 2024

s/ Laura Palmerin  
Laura Palmerin