

**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,)

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

v.)

KWAME RAOUL, et al.,)
Defendants,)

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

v.)

BRENDAN KELLY, et al.,)
Defendants,)

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

v.)

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

DECLARATION OF ROGER KRAHL

1. I, Roger Krahl, 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 the President of Sportswereus, Inc., dba R Guns. R Guns has been a member of Federal Firearms Licensees of Illinois (“FFL-IL”) since before Protect Illinois Communities Act, House Bill 5471 (“PICA”) was adopted and has remained one since. R Guns manufactured and sold in the State of Illinois semiautomatic AR-platform rifles that accept detachable magazines and have a pistol grip, flash suppressor, barrel shroud, and adjustable stock. Prior to PICA taking effect, R Guns would sell between 3,000-5,000 such rifles a year in Illinois. Upon PICA taking effect, it ceased manufacturing or selling any such firearms in Illinois for fear of prosecution for violating PICA. As a result, not only has it lost the vast majority of its income source, it had to pay hundreds of thousands of dollars to construct a storage facility outside of Illinois to house its products that can no longer be sold in Illinois. Its future survival is in doubt, due to PICA’s restrictions on the products it previously manufactured and sold in Illinois. But for fear of prosecution for violating PICA, R Guns would resume manufacturing and selling in Illinois semiautomatic AR-platform rifles that accept detachable magazines and have a pistol grip, flash suppressor, barrel shroud, and adjustable stock.

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 Illinois.

s/ Roger Krahl

Roger Krahl
Declarant

CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2024, an electronic PDF of **DECLARATION OF ROGER KRAHL** 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