

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

CALEB BARNETT, <i>et al</i> , <div style="text-align: center;">Plaintiffs,</div>)	
)	
vs.)	Case No. 3:23-cv-209-SPM
)	
KWAME RAOUL, <i>et al.</i> ,)	** designated Lead Case
)	
Defendants.)	
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DANE HARREL, <i>et al</i>,)	
)	
Plaintiffs,)	
)	Case No. 3:23-cv-141-SPM
vs.)	
)	
KWAME RAOUL, <i>et al</i>,)	
)	
Defendants.)	
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JEREMY W. LANGLEY, <i>et al</i> ,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 3:23-cv-192-SPM
)	
BRENDAN KELLY, <i>et al</i> ,)	
)	
Defendants.)	
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FEDERAL FIREARMS LICENSEES OF ILLINOIS, <i>et al</i> ,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 3:23-cv-215-SPM
)	
JAY ROBERT "J.B." PRITZKER, <i>et al</i> ,)	
)	
Defendants.)	

DECLARATIONS OF HARREL PLAINTIFFS

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

DANE HARREL, an individual and resident of St. Clair County, Illinois;

C4 GUN STORE, LLC, an Illinois limited liability company;

MARENGO GUNS, INC., an Illinois corporation;

ILLINOIS STATE RIFLE ASSOCIATION;

FIREARMS POLICY COALITION, INC.; *and*

SECOND AMENDMENT FOUNDATION,
Plaintiffs,

Case No. 3:23 CV 141-SPM

v.

KWAME RAOUL, in his official capacity as Attorney General of Illinois;

BRENDAN F. KELLY, in his official capacity as Director of the Illinois State Police;

JAMES GOMRIC, in his official capacity as State's Attorney of St. Clair County, Illinois;

JEREMY WALKER, in his official capacity as State's Attorney of Randolph County, Illinois;

DECLARATION OF DANE HARREL

PATRICK D. KENNEALLY, in his official capacity as State's Attorney of McHenry County, Illinois;

RICHARD WATSON, in his official capacity as Sheriff of St. Clair County, Illinois;

JARROD PETERS, in his official capacity as Sheriff of Randolph County, Illinois;

ROBB TADELMAN, in his official capacity as Sheriff of McHenry County, Illinois;
Defendants.

DECLARATION OF DANE HARREL

I, Dane Harrel, hereby declare under penalty of perjury, that the following information is true to the best of my knowledge and state the following:

1. I am over 18 years old. I am competent to give this declaration. I am providing this declaration based on my personal knowledge and experience.

2. I am a citizen of the United States, and a resident and citizen of the State of Illinois, currently residing in O'Fallon, St. Clair County. I am a retired Lieutenant Colonel in the United States Air Force, and am currently employed as a civil servant for the USAF Air Mobility Command Headquarters in the Operations Directorate.

3. I am also a law-abiding individual, and am legally eligible under federal and state law to possess and acquire firearms. I am a member of Plaintiffs Illinois State Rifle Association ("ISRA"), Firearms Policy Coalition, Inc ("FPC"), and Second Amendment Foundation ("SAF").

4. I own semiautomatic firearms and magazines that are subject to the challenged Bans, and since the Bans have gone into effect I have been subject to the use restrictions and registration requirement associated with the Bans.

5. If it were not for the Bans, I would acquire additional noncompliant magazines as necessary as well as additional semiautomatic firearms that are now banned, including a Ruger Mini-14 and a Springfield Armory M1A.

6. However, because I fear arrest, criminal charges, prosecution, fines and/or incarceration by Defendants under the challenged laws, and because the Bans have destroyed the legal market for such magazines and firearms in Illinois, I cannot exercise my Second Amendment rights by purchasing and using these commonly possessed firearms and magazines.

FURTHER DECLARANT SAYETH NAUGHT.

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

Executed this 24th day of January, 2023.



Dane Harrel

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

DANE HARREL, an individual and resident of St. Clair County, Illinois;

C4 GUN STORE, LLC, an Illinois limited liability company;

MARENGO GUNS, INC., an Illinois corporation;

ILLINOIS STATE RIFLE ASSOCIATION;

FIREARMS POLICY COALITION, INC.; *and*

SECOND AMENDMENT FOUNDATION,
Plaintiffs,

Case No. 3:23 CV 141-SPM

v.

KWAME RAOUL, in his official capacity as Attorney General of Illinois;

BRENDAN F. KELLY, in his official capacity as Director of the Illinois State Police;

JAMES GOMRIC, in his official capacity as State's Attorney of St. Clair County, Illinois;

DECLARATION OF
CHRISTOPHER A. BROOKS

JEREMY WALKER, in his official capacity as State's Attorney of Randolph County, Illinois;

PATRICK D. KENNEALLY, in his official capacity as State's Attorney of McHenry County, Illinois;

RICHARD WATSON, in his official capacity as Sheriff of St. Clair County, Illinois;

JARROD PETERS, in his official capacity as Sheriff of Randolph County, Illinois;

ROBB TADELMAN, in his official capacity as Sheriff of McHenry County, Illinois;
Defendants.

DECLARATION OF CHRISTOPHER A. BROOKS

I, Christopher A. Brooks, hereby declare under penalty of perjury, that the following information is true to the best of my knowledge and state the following:

1. I am over 18 years old. I am competent to give this declaration. I am providing this declaration based on my personal knowledge and experience.
2. I am a citizen of the United States, and a resident and citizen of the State of Illinois, currently residing in Sparta, Randolph County.
3. I am the sole Member and Manager of C4 Gun Store, LLC, an Illinois limited liability company with its principal place of business in Sparta, Randolph County, Illinois. C4 Gun Store, LLC is a federally licensed firearm dealer.
4. I am also a law-abiding individual, and am legally eligible under federal and state law to possess and acquire firearms. I am a member of Plaintiffs Illinois State Rifle Association (“ISRA”), Firearms Policy Coalition, Inc (“FPC”), and Second Amendment Foundation (“SAF”).
5. Until the Firearm and Magazine Bans that are the subject of this suit went into effect, C4 Gun Store, LLC sold both noncompliant magazines and banned firearms, but because of the Bans, C4 Gun Store, LLC has been forced to cease such sales almost entirely.
6. If it were not for the Bans, I would acquire and sell noncompliant magazines and banned firearms to customers who wished to possess such magazines and firearms for lawful purposes and to exercise their Second Amendment rights.
7. However, because I fear arrest, criminal charges, prosecution, fines and/or incarceration by Defendants under the challenged laws, and because the Bans have destroyed the legal market for such magazines and firearms in Illinois, I cannot permit my customers to

exercise their Second Amendment rights by purchasing and using these commonly possessed firearms and magazines.

FURTHER DECLARANT SAYETH NAUGHT.

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

Executed this 24th day of January, 2023.

A handwritten signature in black ink, appearing to read "C. A. Brooks". The signature is written in a cursive style with a large, looping initial "C".

Christopher A. Brooks

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

DANE HARREL, an individual and resident of St. Clair County, Illinois;

C4 GUN STORE, LLC, an Illinois limited liability company;

MARENCO GUNS, INC., an Illinois corporation;

ILLINOIS STATE RIFLE ASSOCIATION;

FIREARMS POLICY COALITION, INC.; *and*

SECOND AMENDMENT FOUNDATION,
Plaintiffs,

Case No. 3:23 CV 141-SPM

v.

KWAME RAOUL, in his official capacity as Attorney General of Illinois;

BRENDAN F. KELLY, in his official capacity as Director of the Illinois State Police;

JAMES GOMRIC, in his official capacity as State's Attorney of St. Clair County, Illinois;

**DECLARATION OF
DOMINIC DeBOCK**

JEREMY WALKER, in his official capacity as State's Attorney of Randolph County, Illinois;

PATRICK D. KENNEALLY, in his official capacity as State's Attorney of McHenry County, Illinois;

RICHARD WATSON, in his official capacity as Sheriff of St. Clair County, Illinois;

JARROD PETERS, in his official capacity as Sheriff of Randolph County, Illinois;

ROBB TADELMAN, in his official capacity as Sheriff of McHenry County, Illinois;
Defendants.

DECLARATION OF DOMINIC DeBOCK

I, Dominic DeBock, hereby declare under penalty of perjury, that the following information is true to the best of my knowledge and state the following:

1. I am over 18 years old. I am competent to give this declaration. I am providing this declaration based on my personal knowledge and experience.

2. I am a citizen of the United States, and a resident and citizen of the State of Wisconsin, currently residing in Lake Geneva, Walworth County.

3. I am the President and sole owner of Marengo Guns, Inc., an Illinois corporation with its principal place of business in Marengo, McHenry County, Illinois. Marengo Guns, Inc. is a federally licensed firearm dealer.

4. I am also a law-abiding individual, and am legally eligible under federal and state law to possess and acquire firearms. I am a member of Plaintiffs Illinois State Rifle Association (“ISRA”), Firearms Policy Coalition, Inc (“FPC”), and Second Amendment Foundation (“SAF”)

5. Until the Firearm and Magazine Bans that are the subject of this suit went into effect, Marengo Guns, Inc. sold both noncompliant magazines and banned firearms, but because of the Bans, Marengo Guns, Inc. has been forced to cease such sales almost entirely.

6. If it were not for the Bans, I would acquire and sell noncompliant magazines and banned firearms to customers who wished to possess such magazines and firearms for lawful purposes and to exercise their Second Amendment rights.


7. However, because I fear arrest, criminal charges, prosecution, fines and/or incarceration by Defendants under the challenged laws, and because the Bans have destroyed the legal market for such magazines and firearms in Illinois, I cannot permit my customers to

exercise their Second Amendment rights by purchasing and using these commonly possessed firearms and magazines.

FURTHER DECLARANT SAYETH NAUGHT.

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

Executed this 24th day of January, 2023.



Dominic DeBock

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

DANE HARREL, an individual and resident of St. Clair County, Illinois;

C4 GUN STORE, LLC, an Illinois limited liability company;

MARENGO GUNS, INC., an Illinois corporation;

ILLINOIS STATE RIFLE ASSOCIATION;

FIREARMS POLICY COALITION, INC.; *and*

SECOND AMENDMENT FOUNDATION,
Plaintiffs,

v.

KWAME RAOUL, in his official capacity as Attorney General of Illinois;

BRENDAN F. KELLY, in his official capacity as Director of the Illinois State Police;

JAMES GOMRIC, in his official capacity as State's Attorney of St. Clair County, Illinois;

JEREMY WALKER, in his official capacity as State's Attorney of Randolph County, Illinois;

PATRICK D. KENNEALLY, in his official capacity as State's Attorney of McHenry County, Illinois;

RICHARD WATSON, in his official capacity as Sheriff of St. Clair County, Illinois;

JARROD PETERS, in his official capacity as Sheriff of Randolph County, Illinois;

ROBB TADELMAN, in his official capacity as Sheriff of McHenry County, Illinois;
Defendants.

No. 3:23 CV 141-SPM

**DECLARATION OF
BRANDON COMBS**

DECLARATION OF BRANDON COMBS

I, Brandon Combs, am competent to state, and declare and certify the following based on the best of my personal knowledge and belief:

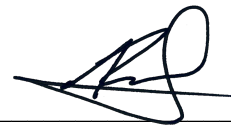
1. I am the Founder and President of the Firearms Policy Coalition (“FPC”).
2. FPC is a 501(c)(4) non-profit membership organization incorporated under the laws of Delaware with its principal place of business in Clark County, Nevada. The purposes of FPC include defending and promoting the People’s rights—especially the fundamental, individual right to keep and bear arms—advancing individual liberty, and restoring freedom. FPC serves its members and the public through legislative and regulatory advocacy, grassroots advocacy, litigation and legal efforts, research, education, outreach, and other programs. FPC’s members reside both within and outside Illinois.
3. FPC has individual members and supporters who are Illinois residents and are adversely impacted by Illinois’s Firearm Ban as defined in 720 ILCS 5/24-1.9 and Magazine Ban as defined in 720 ILCS 5/24-1.10. These include Dane Harrel, the individual Plaintiff in this case, Christopher Brooks, the owner and Member/Manager of C4 Gun Store, LLC, and Dominic DeBock, the owner and President of Marengo Guns, Inc. FPC brings this action to vindicate the rights of its members.
4. But for the criminal enactments cited in the pending Complaint, FPC members who wish to purchase and possess banned firearms and magazines either banned outright under the Illinois law, or which have their usage severely restricted and subject to registration, would purchase and possess such firearms and magazines for their own defense, but they refrain from doing so due to fear of arrest, prosecution, fine and incarceration.
5. Additionally, because the Bans have destroyed the legal market for such

magazines and firearms in Illinois, the affected FPC members cannot exercise their Second and Fourteenth Amendment rights by purchasing and using these commonly possessed firearms and magazines.

FURTHER DECLARANT SAYETH NAUGHT.

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

Executed this 24th day of January, 2023.



Brandon Combs

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

DANE HARREL, an individual and resident of St. Clair County, Illinois;

C4 GUN STORE, LLC, an Illinois limited liability company;

MARENCO GUNS, INC., an Illinois corporation;

ILLINOIS STATE RIFLE ASSOCIATION;

FIREARMS POLICY COALITION, INC.; *and*

SECOND AMENDMENT FOUNDATION,
Plaintiffs,

v.

KWAME RAOUL, in his official capacity as Attorney General of Illinois;

BRENDAN F. KELLY, in his official capacity as Director of the Illinois State Police;

JAMES GOMRIC, in his official capacity as State's Attorney of St. Clair County, Illinois;

JEREMY WALKER, in his official capacity as State's Attorney of Randolph County, Illinois;

PATRICK D. KENNEALLY, in his official capacity as State's Attorney of McHenry County, Illinois;

RICHARD WATSON, in his official capacity as Sheriff of St. Clair County, Illinois;

JARROD PETERS, in his official capacity as Sheriff of Randolph County, Illinois;

ROBB TADELMAN, in his official capacity as Sheriff of McHenry County, Illinois;

Defendants.

No. 3:23 CV 141-SPM

**DECLARATION OF
RICHARD PEARSON**

DECLARATION OF RICHARD PEARSON

I, Richard Pearson, am competent to state, and declare and certify the following based on the best of my personal knowledge and belief:

1. I am the Executive Director of the Illinois State Rifle Association (“ISRA”).
2. ISRA is a non-profit membership organization incorporated under the laws of Illinois with its principal place of business in Chatsworth, Illinois. ISRA has more than 26,000 members and supporters in Illinois and many members outside the State of Illinois. The purpose of ISRA is to promote the Second Amendment rights of its members, which is done through methods which include securing the constitutional right to privately own, possess, and carry firearms in Illinois, through education, outreach, and litigation.
3. ISRA has individual members and supporters who are Illinois residents and are adversely impacted by Illinois’s Firearm Ban as defined in 720 ILCS 5/24-1.9 and Magazine Ban as defined in 720 ILCS 5/24-1.10. These include Dane Harrel, the individual Plaintiff in this case, Christopher Brooks, the owner and Member/Manager of C4 Gun Store, LLC, and Dominic DeBock, the owner and President of Marengo Guns, Inc. ISRA brings this action to vindicate the rights of its members.
4. But for the criminal enactments cited in the pending Complaint, ISRA members who wish to purchase and possess banned firearms and magazines either banned outright under the Illinois law, or which have their usage severely restricted and subject to registration, would purchase and possess such firearms and magazines for their own defense, but they refrain from doing so due to fear of arrest, prosecution, fine and incarceration.
5. Additionally, because the Bans have destroyed the legal market for such magazines and firearms in Illinois, the affected ISRA members cannot exercise their Second

Amendment rights by purchasing and using these commonly possessed firearms and magazines.

FURTHER DECLARANT SAYETH NAUGHT.

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

Executed this 24th day of January, 2023.



Richard Pearson

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

DANE HARREL, an individual and resident of St. Clair County, Illinois;

C4 GUN STORE, LLC, an Illinois limited liability company;

MARENCO GUNS, INC., an Illinois corporation;

ILLINOIS STATE RIFLE ASSOCIATION;

FIREARMS POLICY COALITION, INC.; *and*

SECOND AMENDMENT FOUNDATION,
Plaintiffs,

v.

KWAME RAOUL, in his official capacity as Attorney General of Illinois;

BRENDAN F. KELLY, in his official capacity as Director of the Illinois State Police;

JAMES GOMRIC, in his official capacity as State's Attorney of St. Clair County, Illinois;

JEREMY WALKER, in his official capacity as State's Attorney of Randolph County, Illinois;

PATRICK D. KENNEALLY, in his official capacity as State's Attorney of McHenry County, Illinois;

RICHARD WATSON, in his official capacity as Sheriff of St. Clair County, Illinois;

JARROD PETERS, in his official capacity as Sheriff of Randolph County, Illinois;

ROBB TADELMAN, in his official capacity as Sheriff of McHenry County, Illinois;

Defendants.

No. 3:23 CV 141-SPM

**DECLARATION OF
ALAN M. GOTTLIEB**

DECLARATION OF ALAN M. GOTTLIEB

I, Alan M. Gottlieb, am competent to state, and declare and certify the following based on the best of my personal knowledge and belief:

1. I am the Founder and Vice-President of the Second Amendment Foundation (“SAF”).
2. SAF is a non-profit membership organization incorporated under the laws of Washington with its principal place of business in Bellevue, Washington. SAF has over 650,000 members and supporters nationwide, including thousands in Illinois. The purposes of SAF is to promote the Second Amendment rights of its members, which is done through methods which include education, research, publishing and legal action focusing on the Constitutional right to privately own and possess firearms, and the consequences of gun control.
3. SAF has individual members and supporters who are Illinois residents and are adversely impacted by Illinois’s Firearm Ban as defined in 720 ILCS 5/24-1.9 and Magazine Ban as defined in 720 ILCS 5/24-1.10. These include Dane Harrel, the individual Plaintiff in this case, Christopher Brooks, the owner and Member/Manager of C4 Gun Store, LLC, and Dominic DeBock, the owner and President of Marengo Guns, Inc. SAF brings this action to vindicate the rights of its members.
4. But for the criminal enactments cited in the pending Complaint, SAF members who wish to purchase and possess banned firearms and magazines either banned outright under the Illinois law, or which have their usage severely restricted and subject to registration, would purchase and possess such firearms and magazines for their own defense, but they refrain from doing so due to fear of arrest, prosecution, fine and incarceration.
5. Additionally, because the Bans have destroyed the legal market for such

magazines and firearms in Illinois, the affected SAF members cannot exercise their Second Amendment rights by purchasing and using these commonly possessed firearms and magazines.

FURTHER DECLARANT SAYETH NAUGHT.

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

Executed this 25th day of January, 2023.

A handwritten signature in blue ink that reads "Alan M. Gottlieb". The signature is written in a cursive style and is positioned above a horizontal line.

Alan M. Gottlieb