

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

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

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

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

1. I, Stephen Knutson, am a current resident of Illinois and member of Gun Owners of America, Inc., Plaintiff in the above-titled action. I am over the age of 18 years old and 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 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.

3. I have been directly harmed by PICA by:

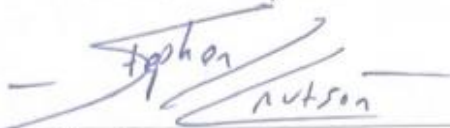
- a. losing the possession and use within Illinois of various firearms that I own because I removed them from Illinois because PICA restricts them and I did not wish to submit an endorsement affidavit for (i.e., register) those firearms;
- b. paying out-of-state storage fees solely to maintain ownership of my firearms that PICA restricts without violating PICA or submitting an endorsement affidavit for (i.e., register) those firearms; and
- c. being unable to obtain in Illinois additional firearms and ammunition that I have been wanting to acquire to use in Illinois for lawful purposes.

4. Prior to January 10, 2023, I owned and possessed at my home in Illinois firearms that PICA restricts. I used those firearms for various lawful purposes, including training and defense of myself, my family, and my home. Desiring to keep my firearm ownership private, I moved multiple firearms that PICA restricts out of Illinois and am paying to have them stored, as I did not wish to disclose the personal information required in an endorsement affidavit. The items moved out of state include at least one AR-platform rifle that accepts detachable magazines and has at least a pistol grip and adjustable stock. I have thus entirely lost the use of those firearms within the State of Illinois, where I reside, for self-defense and for use in recreational shooting, as well as for training.

5. I recently saw an advertisement on an auction for a .50 BMG rifle that I desire to add to my collection but did not bid on the rifle because PICA prohibits the acquisition and possession of such firearms and their ammunition.

6. But for fear of prosecution under PICA for doing so, I would bring every firearm that I removed from the State because of PICA back into Illinois and would acquire new firearms and parts that PICA prohibits, including a .50 BMG rifle and its ammunition.

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 19, 2024, in Rockford, Illinois.



Stephen Knutson
Declarant

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2024, an electronic PDF of **DECLARATION OF STEPHEN KNUTSON** was sent by electronic mail to the following registered attorneys participating in the case:

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Dated: July 19, 2024

s/ Laura Palmerin
Laura Palmerin