

which they continue to be subjected 720 ILCS 5/24-1.09 *et seq.* and 720 ILCS 5/24-1.10 *et seq* and these harms are a continuing transgression against their fundamental rights to bear arms.

4. Plaintiffs have no adequate remedy at law to prohibit the Defendants from enforcement of 720 ILCS 5/24-1.09 *et seq.* and 720 ILCS 5/24-1.10 *et seq.*, absent an injunction from this Court ordering the same.

5. Monetary damages are not sufficient compensation as the complained of transgressions which are infringing upon the fundamental rights of Plaintiffs to bear arms are continuous in nature and no lawful remedy exists.

6. Plaintiff are likely to succeed on the merits as to one or more of the following:

- Defendants are in violation of the Ill. Const. 1970, art. IV, § 8(d), for failure to comply with the Single Subject Rule.
- Defendants are in violation of the Ill. Const. 1970, art. IV, § 8(d), for failure to comply with the Three Readings Requirement.
- Defendants are in violation of the Ill. Const. 1970, art. I, § 2, for failure to comply the Equal Protection Clause.
- Defendants are in violation of the Ill. Const. 1970, art. I, § 2, for failure to comply the Due Process Clause.

7. The balancing of the equities bodes completely in favor of the Plaintiffs for what is being taken away from them is their fundamental right to keep and bear arms, and if in fact the Defendants had a legitimate and compelling state interest which they were seeking to protect, they would not have carved out exceptions for large groups of politically connected organizations.

8. Said another way, during the pendency of this matter, the balancing of the equities demands the Plaintiffs be treated the same as all those classes of individuals whose rights to bear

arms are still intact given the legislature arbitrarily chose to exclude them from having to comply with those provisions of 720 ILCS 5/24-1.09 and 720 ILCS 5/24-1.10 which restrict the Plaintiffs fundamental rights to bear arms.

WHEREFORE, the Plaintiffs respectfully pray this Court enter an order that provides for:

- A. Entry of a Preliminary Injunction enjoining Defendants, or any administrative agency or law enforcement agency under its control, from exercising any color of authority to enforce 720 ILCS 5/24-1.09 *et seq.* and 720 ILCS 5/24-1.10 *et seq.* against Plaintiffs, and
- B. Setting this matter for a preliminary injunction within 10 days; and
- C. Such further relief as this Court deems just and equitable.

Respectfully submitted,

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