

**IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT  
WHITE COUNTY, ILLINOIS**

DARREN BAILEY, ADAM NIEMERG , BLAINE WILLOUR, CORY TOLKA, DANIEL DOLAN, DARREN CASEY, DAVID BOWLING, DON NUGENT, EDWARD FRYE, JEREMY LOGAN, JEREMY LOGAN, LEO CARLSON-TESSLER, MICHAEL LUFF, MICHAEL OSTRENGA, MICHAEL VISCO, RICHARD MARTIN, ROBERT CARROZZA, ROBERT NOVAK, ROBERT NOVAK, BRIAN FLOSI, KELLY FLOSI, JOHN HARDING, CHRISTI MAYER, KEVIN LOWER, MICHAEL SIMPSON, CODY ROSE, NICHOLAS PANTALEO, JUSTIN GESELL, TIM CAMODECA, JEFFERY WELCH, GREGORY HAWKINS, ERIC JENSEN, MARILYN DUDLEY, DENNIS SCHULTZ, KAREN TULLIUS, STANLEY HOLDAMPF, LINDA CHAPMAN, DANE CURRY, KURT JOHNSON, KENNETH SUTTERFIELD, ANTON MARANO, PHIL BLILER, ANTHONY TSAKIRIDIS, BONNIE KASSA, JILL CATALDO, CHARLES FISHER, DANIEL IVASKA, JUSTIN HOLSAPPLE, KENNETH KIRTS, JAMES IDE, CYNTHIA GLEASON, ROBERT PIPER, RONALD WALEROWICZ, BRIAN NEWELL, AUGUST RODEMEYER, BRADLEY NAVARRO, ADAM ALLSOPP, ALEXANDER FARRELL, THOMAS BROMM, DANIEL FLANAGAN, MIKHAIL ARTEMCHIK, ROBERT PALMER, CONNOR HORKAN, DARRIN TATE, JASON RANDALL, LAURA LASWELL, CHRIS MUENTER, FREDERICK LEAVITT, ANDREW WEBBER, LAWRENCE MILLER, GARY DOTHAGER, RYAN VERKLER, GREGORY NEVITT, RUDOLPH COMPART, ARNOLD NORTHRUP, ROBERT SPEAR, JEFFERY S. DICKSON, APRIL LEPIC, TIMOTHY B RIOLA, CHRIS DALTON, MATT SHUMAKER, WILLIAM CLAWSON, DAVID DESTEFANO, REBEKAH FEHR, MICHAEL SILTMAN, CHARLES BIERMAN, BRANDON GEORGE, BRUCE R. LOVELESS, WILLIAM GREENWOOD, JAMES MCDONALD, HOLLIE

2023-MR-\_\_\_\_\_

SHOUP, MICHAEL WITHROW, DAVID SWOCH, TINA DOWDY, DOUG ERVIN, WILLIAM ANTRIM, WILLIAM YARMER, KEVIN COLBERT, DALE GREENE, CYNTHIA STONE, DON RAMERT, FLORENCE GILES, JOSEPH GRESS, DIANE COOPER, ADAM NANNEY, MIRANDA JONES, KATHY STICH, CRAIG BULL, BRADLEY BELANGER, JARED MARSHALL, JEFFREY SMITH, PABLO GUERRA, CHERYL ARENA, ANTHONY SILOS, LEVI HUDDLESTON, SHANE YOUNG, JESSE HARVEY, DAVID DUVALL, SUSAN LOVE, MICHELLE LEWIS, RICHARD WATTERS, JEANNETTE YOUNG, GREG BROCKHOFF, NATHAN DREW, BRANDON GARCIA, JOSEPH PAGE, MARK WILKINS, ADAM KRZYSZTOF CABAJ, SHIRLEY CRUM, JAMES MCCARTHY, EDWARD M WILLENBORG, ENID KINKEL, JAMES UPCHURCH, SANFORD WELTON JR, JOSHUA FERGUSON, DANIEL RODGERS, GLENN SCHROEDER, MARK ANDERKO, WILLIAM TAYLOR, CHRISTOPHER MCCARTY, JOSHUA VANCINA, WILLIAM F CAMPBELL II, MICHAEL BARGER, ROY ELLIS, VICKY CAMPBELL, MATTHEW HUMPHREY, NELSON RUIZ, DEREK RYAN, CODY DENGLER, DANIEL CIBULSKIS, SLAWOMIR BRZEZNIAK, JOSEF BARNETTE, THOMAS HAZINSKI, CURTIS JENKINS, DOUGLAS WARNER, TAMMIE WARNER, CRAIG DEETS, ANDREW LUFT, JONNIE SHANNON, ELIZABETH TAYLOR, JOHN HUTCHINS, SUSAN B DIXON, DAVID BOWEN, LAWRENCE MINER, MICHAEL BASHEM, JOHN ZAWADZKI, AUSTIN WILKINS, JASON WOLF, TODD HITZEMAN, KERI GAUL, GARY BROWN, BENJAMIN SPRINGER, DYLAN GETZ, THOMAS DUNN, SUSAN HITZEMAN, SUSAN BEAL, SHARON FETTING, DEREK GUIDOTTI, TODD BEST, CHARLES LEEPER, STEVEN MILLER III, DAN WIORA JR, DANIEL KLAUS, ROBERT ROGERS, ROBIN CUPI, THOMAS FUCHSGRUBER, REBECCA HELM, TREVOR EIKEY, STEVEN SCOTT, DREW HUDDLESTON, CLIFF MILLER, JOEL

LUBBEN, CHRISTOPHER RILEY, JAMIE  
GRAWEY, CARSON VANSKOY, ELI  
AUBUCHON, TIMOTHY HENNING, BRIAN  
LANGHANS, MICHAEL BOOLMAN, TIMMIE  
KAFFENBARGER, RAYMOND CHRISTY,  
JOHN CARR, MARY DRUMM, JAMES  
THORNTON, PATRICK YOUNG, DAVID  
THORNTON, SAMUEL SCOTT, MARIE  
SCHNAITMAN, FLETCHER PRESTIDGE,  
GREGORY OOTON, TRAVIS HENDRIX,  
SCOTT DEVORE, BRYAN WYRICH, KEITH  
REEVES, SCOTT BOUCHARD, ANTON  
ENGELS, DAVID BYRNE, VICTOR CUEBAS II,  
SHERMAN DEVENING, NATHAN FRIEMUTH,  
MICHAEL ANTONIO SALACUP, KAREN  
REEDER, JACOB JOHNSON, GERALD KHANT,  
THOMAS KONIECZNY, DANIEL GAYNOR,  
ANDREW POTTER, SHANE SMITH, CODY  
FLORA, JAMES ISAAC, PHILIP ROCK, CAROL  
ENGELS, MICHELLE ERICKSON, ALISON  
ARMSTRONG, TRAVIS LEFEBER,  
CHRISTOPHER GOERGES, RANDY  
BERGBOWER, JOHN SHETTERLY, MARTIN  
KRASHOC, DARRIN WHITE, BRYCE EHLERS,  
RAY MERRILL, ELIZABETH BRAGG, NICOLE  
NESTER, JAMES GIOVANNINI, STEVEN  
WOLF, LISA INGRAM, JESSE MARTINEZ,  
DWAYNE SHIPP, CHRISTOPHER LEWIS,  
PETER CURRY, DALTON STRAUCH,  
BRANDON STANLEY, JEFFREY MUCHOW,  
SCOTT BRAGG, BOB CURRY, ROMAN  
BRZOWSKI, DAMON WILLIAMS,  
WILLIAM HANKS, TOMASZ SMALEC, RYAN  
LANCI, ROBERT MAYNARD, KATHRINE  
GOERGES, GREG ECCHER, KENNETH TROST,  
GARY WINES, DAVID SWIERCZ, TOBIAS  
RESPASS, STEVEN MCDONOUGH, FRANK  
BLACK, JEREMY HERSHBERGER, STACEY  
MORGAN, TODD KUNZ, MICHAEL EIKEY,  
KRISTEN CATENCAMP, TERENCE GARVEY,  
MARGARET SOMMERS, EDWARD ORRELL  
JR, CHAD HOOPINGARNER, GAVIN ARVIN,  
CHAD HUEGEN, JERRY CHMURA, JESSE  
DETERS, JEFF RICE, BETH GANNAWAY, TIM  
MERRILL, JON HUTCHINS, JOSEPH L  
SALAZAR JR, JON FUQUA, VIRGIL

STRAUCH, DERRICK RAMERT, MELVYN  
MANIER, MICHAEL MCQUEEN, JOSEPH  
GOLLER, RITCHIE RUIZ, JON ARMSTRONG,  
ANDREW SCHAVONE, JASON HOFFARD,  
ERIC GAYTAN, JAMES CURRY, SALVATORE  
PRATO, BENJAMIN DUNKMAN, RYAN  
THOMPSON, DAVID BENTLEY, TOM  
EVERLY, KAYLA CRABTREE, JOHN MARTIN,  
ERIC SEDDON, STEPHEN MALLOW, JYL  
BRUNET, BRIAN MARCOTTE, KIMBERLY  
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ERNESTI, MATTHEW CHIU, LARRY  
MILLSPAUGH, JEFFREY MURRAY,  
NICHOLAS TOMECZKO, LEVI FARRELL,  
DAVID MCKEIGHEN, HEIDI SCHULTE, ERIC  
HAYS, DENISE HORNBECK, KEVIN  
MARINELLIE, JEREMY BROCK, ANDRZEJ  
KRZYSIAK, JENNIFER OLSON, ROBERT  
HEANEY, JAMES SHURTS, CATHY TURNER,  
AARON SUITS, ANDREW HANSEN,  
EVERETTE CARNEY, DAVID BALINT,  
CHRISTOPHER OKEEFE, KRISTINA KUNCE,  
MELISSA ROYCE, LUIS GONZALEZ, STEVEN  
GRAVES, AUGUSTINO CALDERONE, II,  
THOMAS IGNOFFO, BEVERLY STOLL,  
BROCK WAGGONER, SHARON CENICEROS  
MEADE, MARTIN MINGL, LAWRENCE STEIN,  
JOSEPH ECK, JOSEPH QUINONES, DANIEL  
FLAWS, ZACHERY DEVORE, RODGER  
TELLOR, RONALD BRAZIER, QUENTIN  
MYERS, KENNETH WALTHER, NATHAN  
VOOGT, MARGARET LIMOGES, JANET  
CHAPMAN, LINSY PERIDORE, JAMES  
STITES, SHANE O'HERRON, JUDITH COUNTS,  
JOEL ROOSA, WILLIAM QUINN, WESLEY  
CRAMER, DOUGLAS SLOAN, MARY  
PERKINS, SHIRLEY JOHNSON, KENNY  
COUNTS, STEPHEN POWERS, KEVIN  
WOOLBRIGHT, GARY ADAMS, CHRISTINE  
SWEET, AARON BRANDT, FRED LUCAS III,  
KEITH FUNDERBURK, SCOTT. H WILLIAMS,  
DARIN DENNIS, BRIAN MACK, BRETT  
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WAGER, JARED BARCAI, CHRISTIAN  
KROTKY, DAWN WINTERS, FRANK BATES,  
JENNIFER BELL, CHRISTOPHER CUMMINS,

ROBERT GARRISON II, CATHY HARTMANN,  
TAYLOR NOE, AARON JENKINS, DEBORAH  
BROZIO, NICOLE DAVIS, RYAN KEUCH,  
JASON HEBERLING, KALEB KEERAN, RYAN  
BROMBERGER, MARK FISHER, ROGER  
NEEDHAM, LUCAS KOLBER, AUSTIN  
STEELE, MELISSA HAYS, ROBERT WEBB,  
WILLIAM BECKHAM, PATRICK KLEYWEG,  
BRIAN NIVEN, ANDRE PHILLIPS, ANDREW  
KONOMI, JORDAN LALUMENDRE,  
BENJAMIN FREY, WESLEY HOWARD,  
JESSICA PETERSON, JAMES JACKSON, SARA  
GRIGISKI, BETH GAYTAN, BERTRAM  
IRSLINGER SR, KENNY GRAVEN, AMANDA  
KALMER, JONATHAN MATTA, KYLE LONG,  
WESTON SMITH, SPENCER HASTY, JAMIE  
DRILLING, SCOTT DEXTER, ANITA  
LEKARCZYK, DREW WINTERBOTTOM,  
BERTRAM IRSLINGER JR, CORY HILTON,  
ZUZANNA LEKARCZYK, MICHAEL JORDAN,  
BRIAN SORNBERGER, TRAVIS COX, JOE  
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WAGNER, JASON WOLFE, WALDEMAR  
LEKARCZYK, JEFFREY BRUMMEL, BARNEY  
SHELBURNE, TOM KOPACZ, PATRICK  
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NELSON, ROBERT HABERKORN JR.,  
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GRUBBS, BRITTANY SORNBERGER, DAVID  
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PAGANESSI, JANILYN KOCHER, JESSE  
HAILS, RODNEY HAGAN, PATRICK  
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ROBBIE RAGLAND, AUSTIN DAVIES, DEAN  
VANCE, JACK NOE, JOHN KRAFT, GARY  
LAURENT, DANIEL DROZD, CHADD  
KREOFISKY, GLEN N HANKINS, JOSEPH  
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DAMIR TURCINOVIC, HOWARD BUCKELS,  
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JOST, CODY PATTERSON, BRANDON  
DUNLAP, GINA PLANELL, SEAN WEBB,  
JASON PETERS, FORD JOHNSTONE, CASEY  
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RICARDO RIOS, BRYAN SOKOLOSKI,  
MATTHEW MEMISHEE, DENNIS DOZIER,  
MICHAEL MYERS, LLOYD CARSON,  
HAROLD CRANE, BLAKE PEADRO, CORY  
SCHMIT, TIMOTHY RYAN, JORGE MARTINEZ  
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STANTON MILLER, JAMES DISANTI,  
CHRISTOPHER LAFURIA, TRAVIS HATFIELD,  
REGINA GRUENENFELDER, KEVIN  
FRAPOLLY, JAMIE BEE, WILLIAM VOUDRIE,  
NOAH BOYER, KENNETH DOWNS, RYAN  
CORRIGAN, TANYA ROSS, NICHOLAS  
MYERS, LOUIS MENDEZ, MICHAEL WHITE,  
DAN SHADLE, LARRY WILLEFORD, GARY  
HUTCHENS, EMIL JOHIC, LEMUAL  
CARROLL, RUSS HOEFFKEN, ANNE  
BORMIDA, EDWIN NIEVES, JOHN WRIGHT,  
BRIAN PENROD, DENNIS HEEREN, BRIAN  
QUINN, WILLIAM MEYER JR, MANDY  
KREITZER, ROBERT KING, MICHAEL  
STEINBRECHER, MICHAEL GIANFORTUNE,  
DAVID MEYER, JESSE ZIRKELBACH, CARL  
SUMNER, ADAM BLICKEM, TIMOTHY  
BOUDREAU, DOUGLAS STEINBRECHER,  
NIKKI BELLINGER, MICHAEL FERRERO,  
DENNIS WAGENBACH, FELICIANO GOMEZ,  
MICHAEL CARRINO, LARRY MAY, RYAN  
CHRISTENSEN, ALAN GREEN, JEFF AVERY,  
AUSTIN LEE, KEVIN AUSTIN, CHRISTIAN  
SMITH, MARK HARPER, RAYMOND  
DETTMERING, BRIAN BLOOM, RICHARD  
HAYES, ROBERT BLOKUS, KERRY

BOUMANS, TANNER VEACH, QUENTIN  
POYNTER, STEPHANIE BROWN, TYLER  
WILMOTH, CHRISTOPHER TINCHER, JUSTIN  
GRYGIEL, ANDREW WEGER, NASIR OKLA,  
CARL FERRON, THOMAS SCHIRO, BILLY  
SEITZ, STEVEN KREITZER, TROY AULTZ,  
WAYDE TABOR, NATHAN BONNY, JASON  
SCHURR, BRUCE GUSS, NICHOLAS RIEBER,  
JOSEPH MAHER, DAVID BOEHM, KYLE  
PATRIDGE, CHRISTOS BECHARAS, BRUCE  
HORSTMANN, JAMES EBERSOHL, VICTOR  
QUINTANAR, MITCHELL COHEN, JIM PATE,  
GALE PRYCZYNSKI, ADAM POWELL, JOCK  
CRAIN, LAINE HICKS, KEITH NAFTZGER,  
DOROTHY WALDRON, STEVE SHEPPELMAN,  
JACKIE DAVIS, MARIA BOJAN, LEE  
LANSFORD, RYAN LAWTON, THOMAS  
RADER, TRENTON WARD, JAMES MATUCH,  
TOBY WOLKE, ROBERT DONATO, AMANDA  
LEVI, MARK AUTSCHBACH, JOHN HANSON,  
MARTIN KRYSZCIK, JEFF LOCKHART,  
PHILIP BASTONE, ADAM MOORE, WILLIAM  
MORRISON, RYAN FUQUA, VANESSA  
VIGEANT, ALIAKSANDR PAROSHYN,  
GAYLORD LOCKWOOD, ROBERT  
BOUDREAU, ADAM DURBIN, DAVID  
FRANKS, JOHN HANNEL, MATTHEW  
PHOENIX, MATTHEW MCQUEEN,  
SAMANTHA BASTONE, JAMES J VALLERA,  
JOSEPH QUINTINO, JEREMY MANIER, JOHN  
LESKERA, BENJAMIN NORTON, BENJAMIN  
BASTONE, GLENN BACKS, LISA KNIGHT,  
STACY BYERS, DERRICK HARRIS, MARK  
COHEN, ANDREW BROMELAND, TERRY  
SIKKEMA, TRAVIS BUERSTER, ELOY ORTIZ  
ORTIZ, LUCILLE HAEDICKE, JUSTIN  
LESKERA, SEAN HIGGINS, LYNN PHELPS,  
TOM SPARKS, MICHELLE SEVERINO,  
WILLIAM KIHN, JEREMIAH E. LARSON,  
JACOB WENDLING, CONSTANTINE ALIMOV,  
DORIONE SHAW, MICHAEL SCHERER, JUAN  
MAURICIO GARCIA MONTES DE OCA,  
RICKY SHEPARD, JOSHUA BYERS, JUSTIN  
DUSEK, ERIC SEABAUGH, RACHEL NOXON,  
DEAN JANSEN, JEREMY SPRINGMAN,  
LAWRENCE DREIFURST, JEFFREY R



PURTELL, CHRISTOPHER HOWARD,  
WESLEY HINTERSCHER, JEFFREY SPARKS,  
KEVIN KITSON, DANIEL ROLIH, RICHARD  
STEPHENS, JESSIE KINNEY, JEROD DOLL,  
JAMIE MIX, VINCENT CHRISTY, ARIC  
SERAFINN, LEN KONICH, RICHARD JONUTZ,  
CHRISTOPHER OTERO, BART KNUTSON,  
ROBERT LANDES, DAN MONTGOMERY,  
JARED GERMAN, JOSE CHAVEZ, LISA  
THOMAS, KENNETH BEER, MICHAEL  
CONRAD, MIKE CALDRONE, ANTON J  
ENGELS, TODD KOLAR, KENNETH RIGGS,  
JR, DAVID NELLIGAN, ANTHONY LORIG,  
CARL MYZIA, JEREMY GOSNELL, KAYLYN  
ENGELS, TRISHA HOWARD, JACQUELYN  
WEATHERFORD, PLEAS MILLER, JAMES  
HICKMAN, BEVERLY STREITENFELD,  
TRAVES SWANER, REX RAMIREZ, ROBERT  
LAGRANGE, NOLAN KLINGLER, CHRIS  
LUTZE, STEPHEN BECKER, ALBERT WENDT,  
JAMES STREITENFELD, JOSE FLORES,  
JOSHUA REMER, KEN NAYLOR, KEVIN  
ADAMS, ALLEN AUSTIN, DONALD HIGGS,  
JUSTIN KLEINSCHMIDT, TODD GEIER,  
CALEB GREENE, STEVEN RAINSFORD,  
CHAD COOMBS, MATTHEW ACUFF, ROGER  
HAGEN, JAIME CHAVEZ, CHARLES R PUGH,  
DAVID ANDERSON, ADAM KAUFMAN,  
JAMES HAMM, MICHAEL WEISS, DAVID  
KURTZ, NICHOLAS EQUI, CHAD CROSS, RAY  
MCCRORY, MICHAEL LAURICH, JOSEPH  
NOXON, DAVID PIRTLE, ELIZABETH A  
SWANSON VERDUN, JOHN MATTHEWS,  
FRANK MOLNAR II, JASON EQUI, BRIAN  
LANCI, SHANNON FAST, DANIEL SHANKS,  
ERIC MCCLELLAND, DALE VOGEL, ROBERT  
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MICHAEL DRISCOLL, CHAD RUZICH, GREG  
ABERNATHY, JUSTIN HAWK, TROY  
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ELBERTS, FRED SCHWARTZ, ROBERT  
TEMES, JUSTIN GRIEST, LANCE MYERS,  
DRU SCHWARTZ, SAMUEL PERRY,  
MICHAEL ATKINSON, NATHAN KOTOWSKI,  
SAM ROBERTS, DAVID KOCH, DEVIN  
CARGILL, JONATHAN ZIMMER, TIMBERLE

ENGEL, JOHN DRISCOLL, JOEL DICKERSON,  
TORY MILLS, GREG ROTHWELL, MATTHEW  
KUDO, , KEVIN STEWART, ERNEST ILARDE,  
KHADER ATIQ, BRADLEY CENTOLA JR,  
NELSON HERSCHBERGER, TOMASZ  
KUBACKA, JENNIFER NAZLIAN, RYAN VAN  
THOLEN, ROLLIN MARTIN, ROBERT PIERCE,  
RUSSELL BUCK, DENISE ZABELLE, MICAH  
GRAY, ROBERT MORRISSEY, JOHNNY  
SCHULDT, WILLIAM DETTMER, DARREN  
SHELDON, DAWN CLEER, JAMEY CROWL,  
MICHAEL TILKIAN, DEBORAH LEWIS, TONY  
STUBER, STEVEN GRIBBIN, PAUL  
VARICHAK, IRENE ZUREK ALWAN, JOSH  
BRODIE, CHAD BAKKELUND, JAMES  
NUGENT JR, KEN JOHNSEN, ANDREW  
SPOUR, BRIAN THOMAS, FREDERICK  
GEPPERT, JAMES GARLAND, AAMIR  
AHMED, CHAD FARLEY, STEVE KROUSE,  
WILLIAM LAATSCH, JEFFREY WILCOX,  
KEVIN TURNER, JASON RUMPLE, ANDREW  
DRISCOLL, COOPER ANDERSON, DON VOSS,  
SCOTT GREEN, AMELIA BRYCELEA, CHAD  
VICEVICH, TIMOTHY BRIAN, ERIC NANNEY,  
BARBARA WEBSTER, JAROSLAW CYBORAN,  
JARED VYBORNY, JOSHUA KUHL, ROBERT  
STRIETER, LAURA JOHNSON, SEBASTIAN  
NOWACKI, RYAN GOTSCH, DOUG  
ACKERSON, JOSEPH GOSSELIN, JOANNA  
GRELA, BRIAN ALLEN, MICHAEL JOHNSON,  
DUSTIN THORNTON, NICHOLAS KATRICHIS,  
SCOTT FALLON, CHRISTINE DAVIS,  
WILLIAM BAER, MICHAEL ALFREJD SR.,  
KIRSHA POLLAK, DANIEL BAUM,  
CHRISTOPHER HENDERSON, LINDA BEESE,  
SHAWN DAVIS, DARREN SAATHOFF, MARK  
STREENZ, JACOB BLANK, CHRISTOPHER  
RYAN, JOSHUA WAGER, ALVIN SIEBERT,  
SCOTT PAGE, JASON MCMECHAN, JOHN  
HOLIAN, TRACY JACOBSON, GAVIN  
PATTON, SHANNON MCCLURG, DOUGLAS  
BEESE, DAMON HENDRIX, KELLIE SIEBERT,  
JAMES LAURIDSEN, DAVID PRUETT, KEITH  
ERWIN, ROBERT KAZELAK, CRYSTAL  
STEINBACH, CHRISTINE ROYER, TOM  
RETELNY JR, DONATO MARRELLO,

CHRISTOPHER POLLARD, ALEXANDER  
ROGERS, DAVID MILLER, CHRISTOPHER  
BARBEE, HAROLD ROBINSON, FLORENCIO  
ARRIETA, BROCK NORMAN, MICHAEL  
HINKAMPER, CHARLES DIVITO, BRIAN  
TURNER, TODD KROENLEIN, TIMOTHY  
HEBB, JAMES MULLEN, ROGER SMITH,  
TIFFANY TURNER, GUY HAINES, RODNEY  
KING, DENNY DE BALTZ, VINCENT  
DZIEGLEWICZ, CHRISTOPHER VON RHEIN,  
KEVIN BUSDEKER, MICHAEL KIBLER,  
THOMAS MACDONALD, TARVY3 FRIEDERS,  
JAIME OROZCO, DAVID BIENEMAN,  
JEFFREY HENDRICKSON, JODI BOND,  
ETHAN MCALLISTER, TYSON BIRK, SHAWN  
DOWLER, JOHN MACKENDER, ERICA VANA,  
ROBERT FEIGEL, JAMES BOND, GREGG  
WIEDMEYER, NATHAN STICHTER, STEVEN  
DOLSON, BARBARA LYNN, SCOTT VANA,  
COREY PERIGO, JOHN DELAP, JASON  
JOHNSON, FRANK LARDINO, THEODORE  
VERDUN, LUKASZ CYBORAN, KENDALL  
TABBERT, KENNETH SHARP, EUGENIO  
MASCOTE JR, CHRISTIAN LAMAS,  
CHRISTOPHER DEBOLT, CRISTY BECK,  
GARY WENGER, JILL PFIEFFER, ELIZABETH  
JACKSON, DIANNE MITROPULOS, STEVEN  
JACKSON, JOHN VAN RIPER, MARIA FEIGEL,  
STEPHAN RYAN, MICHAEL EGAN, KELBY  
HARTMAN, MATT APPELBAUM, MARTIN  
BOERSMA, MICHAEL BARAN, STEVE  
STALTER, BRIAN RITCHIE, TODD HENNIG,  
ERIC WILLIS, JORDAN WILLIS, GABRIEL  
HOLMES, DEAN BRAUN, ERIC PETTY,  
WYETT COLCLASURE, SEAN GORE, BRENT  
SMOTHERS, FRANK ZERA, JOSEPH W  
MUNNO, JEFFREY SEIMER, RANDALL  
ROSENBOOM, SCOTT TRUCKENBROD,  
MARTIN CULP, NICHOLAS REED, DANIEL  
EASTERDAY, MICHAEL LANGAN, GEORGE  
BOUTSIKAKIS, STEVEN DISTLER, CHRIS  
HOLLOWAY, MIKE SHIROBOKOV, JOHN  
DAVOS, KEVIN MILLER, TIM WORKER,  
MATTHEW PHILLIPS, ERIC EDWARDS,  
BRANDON RILEY, KURT BENSON, DAVID  
MATTHEW DUNN, DONALD LARSON,

JOSHUA ENGELKING, WILLIAM  
HENDERSON, MARK TRAXLER, PETER  
FRESE, TRAVIS NEWBERG, CHRISTOPHER  
KELLER, BRETT ZEHR, JOSEPH ELLIS, KEVIN  
WILKINS, AMY BERG, ROBERT LAWLESS,  
ANGEL JACOBS, DAVID GREENE, JAMES  
DURHAM, BROCK KROENLEIN, MICHAEL R  
STALLONS, AKIB KHANANI, DANIEL  
SCHAHCZINSKI, JOHN JACOB, CHARLES  
LOWDER, JIM HINTHORN, DUANE  
THEESFELD, ERIC WIERSEMA, SHANE  
LYBERGER, KARI SCHROEDER, LARRY  
CATRON, COREY DEITZ, LARRY MILBY,  
JACOB SMITH, TIMOTHY KEELER, WILBUR  
LAHMANN, JAMES BUTTON, PAUL  
KOLODZIEJ, NICHOLAS CARTER, ADAM  
PIKE, MICHAEL O'NEIL, HIEU PHAN, AUSTIN  
SPARKS, KEITH FEDOREV, HAROON  
ANWAR, ZACHARY FERRIS, RYAN BUSCH,  
CHRIS NEWBERG, ROBERT BOWEN, LLOYD  
HANNA, PAMELA JIHNSON, LARRY  
PRATHER, MICHAEL D'AMICO, ERIC  
SMITHSON, ERIC DAWSON, DANIEL LEATZ,  
PAUL MUELLER, STEVEN HALCOMB, JACOB  
HERDA, THOMAS SCHAEFER, JASON  
CHANGRACHANG, PATRICK MCDONAGH,  
CARL HOLMAN, JAKE BUHNERKEMPE,  
WILLIAM HOBBS, LUCAS KRAMER, LOGAN  
HARMON, JOHN LUDWIG III, TIMOTHY  
ARCHER, WESLEY MATTHEWS, DAVID  
LANOUE, ROSS ROSENBERG, SEAN LOETE,  
BRANDON WEINHAMMER, DAVID VERDICK,  
CODY REIBER, TRAVIS SCHMITT, JERRI  
STEVESON, DANIEL FELL, JULIE FISCHER,  
CHRISTOPHER ROBERTS, PREBEL ALLEY,  
VALERIE GAFFNER, PAUL MOY, JEFFREY  
STAGGS, BRANDON FINCH, LINDA  
LANDERS, DARREN WEAVER, DOUGLAS  
SCHAUFELBERGER, JOSEPH LILLIG, JASON  
ROSE, ANGELA FREELS, MICHAEL KUCHAN,  
ROBERT ROYER, PAUL CRUTCHER, JEFFREY  
MAXWELL, KODY WIEWEL, CLARISSA  
BARTLETT, SCOTT ROLSTON, LISA LEE,  
WILLIAM BAHNFLETH V, MARY TURNER,  
JOELLE ELBERTS, KATHRYN PHILLIPS,  
JULIE RUMSEY, TRAVIS PRATHER, LEVI

SLIFER, JEREMY WILEY, ANNA HARLA,  
DAVID LYNN, JUSTIN VYBORNY, RANDY  
ALDERSON, PHILIP NAGEL, JERRY CIELAK,  
EILEEN MULLEN, CHRISTOPHER ELLIOTT,  
WAYNE ROHAC, WLADYSLAW KLEJKA,  
ZACHARY RYAN, CODY AGNEY, OLIVER  
HASCHKE, ROBERT THOMAS, MICHAEL  
MARTIN, ABRAHAM ATIQ, KIMBERLY  
HAUBER, MICHAEL CRAMER, NICK  
FELDHAKE, NATHANIEL MILLER, KEITH  
MILLER, KEVIN O'BRIEN, DEBRA DURHAM,  
JEREMY VYBORNY, JEREMY RITTENHOUSE,  
LOGAN CAPPS, JACQUELINE ILARDE,  
JUDITH SIEBERT, RACHEL JENDRZEJCZYK,  
DAVID KOONCE, FAYEZ ATIQ, KURT  
SERRINE, RICHARD BROCK, DOUGLAS  
TOWLE, JAY HUNT, CHAD RICE, JEREMY  
DAVIS, DAVID ALLEN DAVIS, SHARON K  
DAVIS, LYDIA FUNNEMAN, DANIEL  
HECKMAN, JENNY TIRADO, JEFFREY  
NESLER, IVAN BENITEZ, ROBERT HARE,  
ALAN NATES, GAVIN WILKERSON,  
BRENDON BOWERS, TODD TOSETTI,  
DWAYNE RITCHEY, WOODY HEUERMAN,  
RUTH REINHART, BRANDON JOHNSON,  
WILLIAM BUSCH, GREGORY WILLIAMS,  
MICHELANGELO DADDABBO, SANDY  
CARTER, STEPHEN ALVIS, SCOTT WICK,  
MICHAEL PAYNE, DONALD AHLERS,  
PATRICK MUELLER, BRANDON MITCHELL,  
IVAN E MILLER JR, DARRIN DISS, ROSE  
O'DELL, BROCK ROHN, ROBERT MANN,  
BRANDON CARLSON, CHANC PERSONS,  
THOMAS BOYCE, TRAVIS EWING, BRADLEY  
ROBERT, MATT STEELE, ERIC  
CARRUTHERS, TREVOR SILVER, CHARLES  
SEIMER, DARYL HARDING, ANNE BAILEY,  
TODD SKIPWORTH, JOHN PHILLIPS, JOSHUA  
KOHTZ, ROBERT CARTER, MATTHEW  
FELTES, PATRICK NICHOLSON, SUZETTE  
SWIFT, LARRY BAYER, NICHOLAS  
MOUNTJOY, ANTHONY BUTLER, DAVID  
MORRIS, JESSE GEYER, ADAM SMITH,  
MATTHEW FIORENTINI, ANATOLIE DIGORI,  
DAVID ZERRUSEN, GEORGE BORAWSKI,  
JOHN JOSEPH, SAAD AHMAD, ERIC

THOMPSON, LAURA SCHIAVONE, ROBERT  
RUNTY JR., DINA PORRO, NANCY ZEITZ,  
CHRISTOPHER KASPERSKI, LEAANN  
HAMPTON, JEFFREY FELL, ZACHARY  
SANSON, MICHAEL LEWIS, JOHN WILLIAM  
JOHNSON, JOHN TURRENTINE, REATHA  
TEUERLE, THOMAS CHALMERS, JE, KYLE  
NAKAWATASE, JAMES HILL, DYLAN  
NIEBRUGGE, RON SANDY, LOUIE  
TOLEDANO, ADAM BUGLIO, JAMES STOUT,  
PATRICK SALDANA, TIMOTHY PHOENIX,  
JANE THOMPSON, CONRAD CARIA, JORDAN  
THOMPSON, MICHAEL MAXWELL, ASHLEY  
RAMOS, MATT KUZEL, SHAUN SANDERSON,  
JEFF WASCOW, JULIE KREJCI, ARLENE  
LANOUE, LUKE DARCHE, DONOVAN  
THOMPSON, KARLA WASCOW, BRANDON  
HUFF, DAVID HARP, LARRY HOOKER,  
JOSEPH SATTERLEE, SEAN BAKER, JOSE  
CALIXTO DIOLA, WALTER FREEMAN,  
CHRISTOPHER TENNYSON, SEAN STEVENS,  
BRANDON PETERS, JORDAN MAHER,  
BECKY MORROW, GARY NIEBRUGGE,  
LESLIE SCHULZ, DAVID ERLINGER, J  
KNIPMEYER, TODD HELMKAMP, MICHAEL  
GARRISON, JOHN HALLA, TODD  
PERREAULT, PATRICIA KIELMA, TIFFANY  
LANOUE, ROSS CORNETT, BRIAN R ZEITZ,  
MARK CLARK, JOHN HENDRIX, PETE  
KEHLERT, DARREN ALMAN, THOMAS  
HURT, JOSE SERRANO, GARY LOWERY,  
KEVIN KNIPMEYER KNIPMEYER, SANDRA  
GILLET, JOSEPH DELAGO, CHRISTOPHER  
NECKOPULOS, WILLIAM POSTLE, DAVID  
FRENCH, JOSEPH ATOU, JERIMY  
CHAMBERS, PAUL MURPHY, NEIL  
LINDWALL, KYLE MORGAN, JAMES CLOW,  
TERRY KENT, MATTHEW MUSIL, DEVIN  
WINTERROTH, MARK HOFFMAN, BRANDON  
LANOUE, PATRICK MCATEER, SUSAN  
SWEENEY, PATRICK E BELL, NICOLAS  
FLEIGLE, CURTIS RAPP, JEFFERY MILLER,  
MASON MENIGOZ, DONALD FRIERDICH,  
JUSTIN HENDEE, RYAN SUMMERS, KEITH  
FUHRMAN, DARIN HOFFMIRE, CHAD  
SCHAIVE, DYLAN WEMPEN, TONY KITTLE,

GABRIELLE RIFE, STEVEN PAPROCKI,  
SHAWN CUPI, DR. BRANDON COMBS, JESSE  
ADKINSON, STEVE ARNSMAN, CORTNEY  
HARRIS, DOROTHY J. KAZUK, ADAM  
COPOT, DAVID TAYLOR, TRACY CHAPPELL,  
TERESA REYNOLDS, PIOTR WOJTANOWICZ,  
ADAM MCCURDY, KELVIN WORKER, DAVID  
JACKSON, FERNANDO BASULTO JR, SEAN  
JELINEK, ERIC RADLIFF, GALE GOWER JR,  
DOLORES MARLEY, ROBERT MUNCER,  
GERARDO RIVERA, SHAWN BUEHLER, ERIC  
HOLMAN, ROGER FREUND, KEVIN NANCE,  
JOSEPH STEINKE, ROBERT PALUMBO,  
PAWEL WOJEWODA, KYLE GRIEFF, RYAN  
GRIEFF, KURT A UNDERWOOD SR, MAYCEL  
YOUSEF, JOSEPH LYNN, RALPH COX II,  
DANIEL CARPENTER, JUSTIN LANGLOIS,  
CON CAMPBELL, RONALD SCHNEEMAN,  
KENNETH THORNE II, MATTHEW SCHROCK,  
LUANNE THORNE, THOMAS MORRIS,  
ARTHUR BECKER, WILLIAM MUHICH, JOHN  
RILEY, DOUG KLEIN, MOHAMMAD ATIQ,  
ALAN SCHROCK, JACK HARPER, JANET  
SCH AHL, AARON ZANE, WALTER SANFORD,  
THOMAS PETROFF JR, ALFONSO DIAZ,  
TIMOTHY LANE, WILLIAM PINDOZZO,  
MATTHEW HERZIG, KERRY SCHOTT,  
JEFFREY KILBURG, MICHAEL GIESE,  
MARGARET TORPHY, CHARLES FRIEND,  
RANDY PARKER, STEVEN PROHASKA,  
RANDAL HODGSON, LEONARD GAVET,  
WILLIAM BAUMHEUTER, CHRISTOPH  
SCHOEPFER-GROSSKURTH, GREG WYLAND,  
WARREN NEUMAN, MARK FRIEDERS,  
RANDY CURTIS, BRIAN GARRETT, ANGEL  
RIVERA, JOHN JONES, JAMES ELLIS,  
DONALD SCHREINER JR, LORI NELSON,  
JOHN BOGUCKI, KENT ZBINDEN, ANDREW  
MERKLE, MARK COBETTO, KEVIN WALDEN,  
CATLIN ARNOLD, MICHAEL NORTON,  
STEVEN BARBEE, ANTHONY CAIN, STEVEN  
VAUGHN, ROBERT MORAN, DANIEL LYONS,  
RENEE NORTON, DARBY SABO, WILLIAM  
HJERTSTEDT, MICHAEL EDLIN, NICHOLAS  
WOODY, TIMOTHY SWEET, JOSHUA  
JACOBS, TOBE FULFORD III, GREGORY

RITTER, JOSH WALKER, TONY BURDEN,  
PETER JEGLINSKI, CAROLYN M. HOLLAR,  
JONATHAN WILLS, JOSHUA SITZMORE,  
CHRISTOPHER CARRIER, KENNETH DALKE,  
WILLIAM ZELLER, JAKE MACIEJEWSKI,  
ARTEM GAVRANIN, GLENN LEONARDO,  
DEBRA GILBERT, ZACHARY RITTER,  
MORGAN DONOVAN, CHRISTOPHER  
SPRACKLIN, WIESLAW GAL, LESZEK  
GASKA, JOHN SUJAK, NICK STEIN, GUY  
BLAKE, JERALD TARBLE, PHILIP GRABBE,  
CHRISTOPHER LEER, HUNTER LEWIS,  
MATTHEW SCHAAL, JOHN ARNDT, NIKOLA  
LOHJA, JAMES TIPTON, THOMAS KOEHNE,  
TOBEY RICE, DAVID JANUSZ, ERIC  
GORDON, JACOB HUTSON, LOGAN  
SCHERTZ, DWAYNE BECCUE, PETER  
GAMBIANI, RYAN HARPER, MATTHEW  
CHAFFIN, MARC CAIN, CESAR ALEXANDER  
ZURITA, ISRAEL SILTMAN, KARL  
HUCKSHOLD, LYNDELL WAGGENER, JOEL  
MARCHIO, MARK WARNECKE, NORBERTO  
QUINTANAR, KENNETH SPIER, GARY LIND,  
KIM GRABBE, TROY BUCCINI, MICHAEL  
CLARK, DANIEL R. KEELE, CATHERINE  
GRAY, LAWRENCE CLAVEL, LARRY  
MORGAN, JASON GASCOIGNE, JONATHON  
KOHL, DAN MAGEE, GAVIN YEDNOCK,  
NATHAN HAUERT, EDWARD MCGLADE,  
ERIK JOHNSON, THOMAS KENT, DOUGLAS  
CAMPBELL, GREGORY SAPP, KATIE  
DEANESCHLOTTMAN, MICHAEL MOFFITT,  
EILEEN HUBER, CHRIS WHITE, RYAN  
GARRETT, MICHAEL WRIGHT, MICHAEL  
BAUMANN, PAUL REES, SHAUN UNELL,  
DEREK BRANDT, STEPHANIE RANDALL,  
JOSEPH HULSEY, MICHAEL SHANNON, JOSH  
WELKER, STEVE DUNCAN, RON GRUBB,  
MICHAEL PETERS, JEFFREY BENTLEY,  
JEBIDIAH SMAIL, DANIEL DOTY, MATTHEW  
ZALLER, JEREMY JONES, BRADLEY  
COPPEDGE, BRIAN HARTONG,  
CHRISTOPHER BURKETT, DAVID GRESSEL,  
STACI DUNCAN, JEFF BECKMANN, JEFFREY  
DENIS, TYLER LEWIS, 3RD MONKEY  
TACTICAL, AJ GUNZ INC, ALLAN R VANDER



MEERSCH GUNS, ALSATIAN ENTERPRISES  
LLC, B N T ARMS, BAT ARMS LLC,  
BOONDOCKS GUN CLUB, LLC,  
BORDERTOWN GUNS INC, BUFFALO RANGE  
& GUN CO., BULLET TRAP, INC., BULLET,  
BARREL & GUN LLC, C.O.P.S., INC, C&M  
ARMS, CARBON CLIFF BAIT & TACKLE INC,  
CHANDLER FIREARMS, CHECK YOUR 6, INC,  
CHICAGOLAND GUNS & RANGE LLC, DAN  
CHAPPELL ENTERPRISES, DIAMOND  
DEVELOPMENT CO (DBA ZINK BUILDING  
CENTER), DLD VIP LLC, DOWN RANGE LLC,  
DT ENTERPRISES, FERAL FIREARMS &  
MANUFACTURING COMPANY, FOX VALLEY  
SHOOTING CLUB LLC, GADDIS GUNS, GAHM  
ENTERPRISES INC, GAMEMASTERS INC.,  
GAT GUNS, INC., GREEN ACRES  
SPORTSMAN'S CLUB, GREGORY D  
CARRIGLIO, GREGORY R SCARBOROUGH  
FFL, GUN SMOKE, GUNS & GLORY, GUNS-N-  
SUCH INCORPORATED, ILLINOIS OUTDOOR  
SPORTS LLC, J.R. SHOOTING SPORTS, KAM  
SHOOTING SPORTS, KEE FIREARMS AND  
TRAINING LLC, KENROB, INC. (DBA) ROUTE  
130 PAWN, LAW WEAPONS AND SUPPLY,  
LETS GO BABY LLC DBA SECOND  
AMENDMENT SPORTS, MICHAEL A  
FARNIOK DBA LEADSLINGERS, MILITARY  
SURPLUS DEPOT, MMI INC (DBA: MMI  
GUNS), OUTDOOR OBSESSIONS, LLC, PETER-  
JOHN NIKOLIC, PINNACLE GUN AND AMMO,  
PONTIAC EXCHANGE, PRESLEY OUTDOORS  
LLC, RAMPART RANGE INC, ROCK CREEK  
ARMS, INC., ROSS OUTDOOR SHOOTING  
SPORTS LLC, SMOKIN GUN WORX LLC,  
SOUTHFORK FIREARMS, SOUTHLAND  
FIREARMS & SHOOTING SUPPLY, SWAATS  
GUN SHOP LLC, T & K SALES, TACTICAL  
BUNKER, TC PRECISION GUNSMITHING  
LLC, THE FIREARMS TRADING POST LLC.,  
THE MONEY PIT, THE OUTDOORSMAN  
SPORT SHOP, TIMBERLAND FIREARMS,  
TRANSFERS BY JOHN, INC.,  
WHITETRIANGLE ENTERPRISES LLC,  
WILCOX FRONTIER SPORTING GOODS,

YOUR LIBERTY LLC, ZANCHA'S GUNS &  
AMMO INC,

Plaintiffs,

vs.

Governor JAY ROBERT PRITZKER, in his  
official capacity.

EMANUEL CHRISTOPHER WELCH, in his  
capacity as Speaker of the House.

DONALD F. HARMON, in his capacity as Senate  
President.

KWAME RAOUL, in his capacity as Attorney  
General.

Defendants.

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**COMPLAINT FOR DECLARATORY  
JUDGMENT AND INJUNCTIVE RELIEF**

NOW COMES, Plaintiffs, (See Exhibit A), by and through their attorneys Thomas G. DeVore, of the Silver Lake Group, Ltd., and Bryan Drew, of the Drew Law Group, and for their Verified Complaint for Declaratory Judgment and Injunctive Relief against Defendants, hereby allege as follows:

**PARTY PLAINTIFFS**

1. 3RD MONKEY TACTICAL, AJ GUNZ INC, ALLAN R VANDER MEERSCH GUNS, ALSATIAN ENTERPRISES LLC, B N T ARMS, BAT ARMS LLC, BOONDOCKS GUN CLUB, LLC, BORDERTOWN GUNS INC, BUFFALO RANGE & GUN CO., BULLET TRAP, INC., BULLET, BARREL & GUN LLC, C.O.P.S., INC, C&M ARMS, CARBON CLIFF BAIT & TACKLE INC, CHANDLER FIREARMS, CHECK YOUR 6, INC, CHICAGOLAND GUNS & RANGE LLC, DAN CHAPPELL ENTERPRISES, DIAMOND

DEVELOPMENT CO (DBA ZINK BUILDING CENTER), DLD VIP LLC, DOWN RANGE LLC, DT ENTERPRISES, FERAL FIREARMS & MANUFACTURING COMPANY, FOX VALLEY SHOOTING CLUB LLC, GADDIS GUNS, GAHM ENTERPRISES INC, GAMESMASTERS INC., GAT GUNS, INC., GREEN ACRES SPORTSMAN'S CLUB, GREGORY D CARRIGLIO, GREGORY R SCARBOROUGH FFL, GUN SMOKE, GUNS & GLORY, GUNS-N-SUCH INCORPORATED, ILLINOIS OUTDOOR SPORTS LLC, J.R. SHOOTING SPORTS, KAM SHOOTING SPORTS, KEE FIREARMS AND TRAINING LLC, KENROB, INC. (DBA) ROUTE 130 PAWN, LAW WEAPONS AND SUPPLY, LETS GO BABY LLC DBA SECOND AMENDMENT SPORTS, MICHAEL A FARNIOK DBA LEADSLINGERS, MILITARY SURPLUS DEPOT, MMI INC (DBA: MMI GUNS), OUTDOOR OBSESSIONS, LLC, PETER-JOHN NIKOLIC, PINNACLE GUN AND AMMO, PONTIAC EXCHANGE, PRESLEY OUTDOORS LLC, RAMPART RANGE INC, ROCK CREEK ARMS, INC., ROSS OUTDOOR SHOOTING SPORTS LLC, SMOKIN GUN WORX LLC, SOUTHFORK FIREARMS, SOUTHLAND FIREARMS & SHOOTING SUPPLY, SWAATS GUN SHOP LLC, T & K SALES, TACTICAL BUNKER, TC PRECISION GUNSMITHING LLC, THE FIREARMS TRADING POST LLC., THE MONEY PIT, THE OUTDOORSMAN SPORT SHOP, TIMBERLAND FIREARMS, TRANSFERS BY JOHN, INC., WHITETRIANGLE ENTERPRISES LLC, WILCOX FRONTIER SPORTING GOODS, YOUR LIBERTY LLC, ZANCHA'S GUNS & AMMO INC are business entities which, *inter alia*, desire to manufacture, deliver, sell, import, or purchase an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge and/or manufacture, deliver, sell, or purchase large capacity ammunition feeding devices as defined in 720 ILCS 5/24-1.9(a) and/or 720 ILCS

5/24-1.10(a).<sup>1</sup>

2. DARREN BAILEY, ADAM NIEMERG , BLAINE WILHOUR, CORY TOLKA, DANIEL DOLAN, DARREN CASEY, DAVID BOWLING, DON NUGENT, EDWARD FRYE, JEREMY LOGAN, JEREMY LOGAN, LEO CARLSON-TESSLER, MICHAEL LUFF, MICHAEL OSTRENGA, MICHAEL VISCO, RICHARD MARTIN, ROBERT CARROZZA, ROBERT NOVAK, ROBERT NOVAK, BRIAN FLOSI, KELLY FLOSI, JOHN HARDING, CHRISTI MAYER, KEVIN LOWER, MICHAEL SIMPSON, CODY ROSE, NICHOLAS PANTALEO, JUSTIN GESELL, TIM CAMODECA, JEFFERY WELCH, GREGORY HAWKINS, ERIC JENSEN, MARILYN DUDLEY, DENNIS SCHULTZ, KAREN TULLIUS, STANLEY HOLDAMPF, LINDA CHAPMAN, DANE CURRY, KURT JOHNSON, KENNETH SUTTERFIELD, ANTON MARANO, PHIL BLILER, ANTHONY TSAKIRIDIS, BONNIE KASSA, JILL CATALDO, CHARLES FISHER, DANIEL IVASKA, JUSTIN HOLSAPPLE, KENNETH KIRTS, JAMES IDE, CYNTHIA GLEASON, ROBERT PIPER, RONALD WALEROWICZ, BRIAN NEWELL, AUGUST RODEMEYER, BRADLEY NAVARRO, ADAM ALLSOPP, ALEXANDER FARRELL, THOMAS BROMM, DANIEL FLANAGAN, MIKHAIL ARTEMCHIK, ROBERT PALMER, CONNOR HORKAN, DARRIN TATE, JASON RANDALL, LAURA LASWELL, CHRIS MUENTER, FREDERICK LEAVITT, ANDREW WEBBER, LAWRENCE MILLER, GARY DOTHAGER, RYAN VERKLER, GREGORY NEVITT, RUDOLPH COMPART, ARNOLD NORTHRUP, ROBERT SPEAR, JEFFERY S.

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<sup>1</sup> Throughout this complaint, Plaintiffs use the phrase “assault weapon” solely due to the fact that Defendants have created an arbitrary definition of the term within HB5471. Plaintiffs contend the weapons, and other attachments, of which Defendants attempt to create a blanket ban are in fact not assault weapons in the sense that none of them are in fact equivalent to weapons of war which the military has access. For all intents and purposes, the weapons defined in the statute are merely some of the most commonly owned semi-automatic weapons.

DICKSON, APRIL LEPIC, TIMOTHY B RIOLA, CHRIS DALTON, MATT SHUMAKER,  
WILLIAM CLAWSON, DAVID DESTEFANO, REBEKAH FEHR, MICHAEL SILTMAN,  
CHARLES BIERMAN, BRANDON GEORGE, BRUCE R. LOVELESS, WILLIAM  
GREENWOOD, JAMES MCDONALD, HOLLIE SHOUP, MICHAEL WITHROW,  
DAVID SWOCH, TINA DOWDY, DOUG ERVIN, WILLIAM ANTRIM, WILLIAM  
YARMER, KEVIN COLBERT, DALE GREENE, CYNTHIA STONE, DON RAMERT,  
FLORENCE GILES, JOSEPH GRESS, DIANE COOPER, ADAM NANNEY, MIRANDA  
JONES, KATHY STICH, CRAIG BULL, BRADLEY BELANGER, JARED MARSHALL,  
JEFFREY SMITH, PABLO GUERRA, CHERYL ARENA, ANTHONY SILOS, LEVI  
HUDDLESTON, SHANE YOUNG, JESSE HARVEY, DAVID DUVALL, SUSAN LOVE,  
MICHELLE LEWIS, RICHARD WATTERS, JEANNETTE YOUNG, GREG  
BROCKHOFF, NATHAN DREW, BRANDON GARCIA, JOSEPH PAGE, MARK  
WILKINS, ADAM KRZYSZTOF CABAJ, SHIRLEY CRUM, JAMES MCCARTHY,  
EDWARD M WILLENBORG, ENID KINKEL, JAMES UPCHURCH, SANFORD  
WELTON JR, JOSHUA FERGUSON, DANIEL RODGERS, GLENN SCHROEDER,  
MARK ANDERKO, WILLIAM TAYLOR, CHRISTOPHER MCCARTY, JOSHUA  
VANCINA, WILLIAM F CAMPBELL II, MICHAEL BARGER, ROY ELLIS, VICKY  
CAMPBELL, MATTHEW HUMPHREY, NELSON RUIZ, DEREK RYAN, CODY  
DENGLER, DANIEL CIBULSKIS, SLAWOMIR BRZEZNIAK, JOSEF BARNETTE,  
THOMAS HAZINSKI, CURTIS JENKINS, DOUGLAS WARNER, TAMMIE WARNER,  
CRAIG DEETS, ANDREW LUFT, JONNIE SHANNON, ELIZABETH TAYLOR, JOHN  
HUTCHINS, SUSAN B DIXON, DAVID BOWEN, LAWRENCE MINER, MICHAEL  
BASHEM, JOHN ZAWADZKI, AUSTIN WILKINS, JASON WOLF, TODD HITZEMAN,

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WILLIAM BAHNFLETH V, MARY TURNER, JOELLE ELBERTS, KATHRYN  
PHILLIPS, JULIE RUMSEY, TRAVIS PRATHER, LEVI SLIFER, JEREMY WILEY,



ANNA HARLA, DAVID LYNN, JUSTIN VYBORNY, RANDY ALDERSON, PHILIP NAGEL, JERRY CIELAK, EILEEN MULLEN, CHRISTOPHER ELLIOTT, WAYNE ROHAC, WLADYSLAW KLEJKA, ZACHARY RYAN, CODY AGNEY, OLIVER HASCHKE, ROBERT THOMAS, MICHAEL MARTIN, ABRAHAM ATIQ, KIMBERLY HAUBER, MICHAEL CRAMER, NICK FELDHAKE, NATHANIEL MILLER, KEITH MILLER, KEVIN O'BRIEN, DEBRA DURHAM, JEREMY VYBORNY, JEREMY RITTENHOUSE, LOGAN CAPPS, JACQUELINE ILARDE, JUDITH SIEBERT, RACHEL JENDRZEJCZYK, DAVID KOONCE, FAYEZ ATIQ, KURT SERRINE, RICHARD BROCK, DOUGLAS TOWLE, JAY HUNT, CHAD RICE, JEREMY DAVIS, DAVID ALLEN DAVIS, SHARON K DAVIS, LYDIA FUNNEMAN, DANIEL HECKMAN, JENNY TIRADO, JEFFREY NESLER, IVAN BENITEZ, ROBERT HARE, ALAN NATES, GAVIN WILKERSON, BRENDON BOWERS, TODD TOSETTI, DWAYNE RITCHEY, WOODY HEUERMAN, RUTH REINHART, BRANDON JOHNSON, WILLIAM BUSCH, GREGORY WILLIAMS, MICHELANGELO DADDABBO, SANDY CARTER, STEPHEN ALVIS, SCOTT WICK, MICHAEL PAYNE, DONALD AHLERS, PATRICK MUELLER, BRANDON MITCHELL, IVAN E MILLER JR, DARRIN DISS, ROSE O'DELL, BROCK ROHN, ROBERT MANN, BRANDON CARLSON, CHANC PERSONS, THOMAS BOYCE, TRAVIS EWING, BRADLEY ROBERT, MATT STEELE, ERIC CARRUTHERS, TREVOR SILVER, CHARLES SEIMER, DARYL HARDING, ANNE BAILEY, TODD SKIPWORTH, JOHN PHILLIPS, JOSHUA KOHTZ, ROBERT CARTER, MATTHEW FELTES, PATRICK NICHOLSON, SUZETTE SWIFT, LARRY BAYER, NICHOLAS MOUNTJOY, ANTHONY BUTLER, DAVID MORRIS, JESSE GEYER, ADAM SMITH, MATTHEW FIORENTINI,

ANATOLIE DIGORI, DAVID ZERRUSEN, GEORGE BORAWSKI, JOHN JOSEPH,  
SAAD AHMAD, ERIC THOMPSON, LAURA SCHIAVONE, ROBERT RUNTY JR.,  
DINA PORRO, NANCY ZEITZ, CHRISTOPHER KASPERSKI, LEAANN HAMPTON,  
JEFFREY FELL, ZACHARY SANSON, MICHAEL LEWIS, JOHN WILLIAM JOHNSON,  
JOHN TURRENTINE, REATHA TEUERLE, THOMAS CHALMERS, JE, KYLE  
NAKAWATASE, JAMES HILL, DYLAN NIEBRUGGE, RON SANDY, LOUIE  
TOLEDANO, ADAM BUGLIO, JAMES STOUT, PATRICK SALDANA, TIMOTHY  
PHOENIX, JANE THOMPSON, CONRAD CARIA, JORDAN THOMPSON, MICHAEL  
MAXWELL, ASHLEY RAMOS, MATT KUZEL, SHAUN SANDERSON, JEFF  
WASCOW, JULIE KREJCI, ARLENE LANOUE, LUKE DARCHE, DONOVAN  
THOMPSON, KARLA WASCOW, BRANDON HUFF, DAVID HARP, LARRY  
HOOKER, JOSEPH SATTERLEE, SEAN BAKER, JOSE CALIXTO DIOLA, WALTER  
FREEMAN, CHRISTOPHER TENNYSON, SEAN STEVENS, BRANDON PETERS,  
JORDAN MAHER, BECKY MORROW, GARY NIEBRUGGE, LESLIE SCHULZ,  
DAVID ERLINGER, J KNIPMEYER, TODD HELMKAMP, MICHAEL GARRISON,  
JOHN HALLA, TODD PERREAULT, PATRICIA KIELMA, TIFFANY LANOUE, ROSS  
CORNETT, BRIAN R ZEITZ, MARK CLARK, JOHN HENDRIX, PETE KEHLERT,  
DARREN ALMAN, THOMAS HURT, JOSE SERRANO, GARY LOWERY, KEVIN  
KNIPMEYER KNIPMEYER, SANDRA GILLET, JOSEPH DELAGO, CHRISTOPHER  
NECKOPULOS, WILLIAM POSTLE, DAVID FRENCH, JOSEPH ATOU, JERIMY  
CHAMBERS, PAUL MURPHY, NEIL LINDWALL, KYLE MORGAN, JAMES CLOW,  
TERRY KENT, MATTHEW MUSIL, DEVIN WINTERROTH, MARK HOFFMAN,  
BRANDON LANOUE, PATRICK MCATEER, SUSAN SWEENEY, PATRICK E BELL,

NICOLAS FLEIGLE, CURTIS RAPP, JEFFERY MILLER, MASON MENIGOZ,  
DONALD FRIERDICH, JUSTIN HENDEE, RYAN SUMMERS, KEITH FUHRMAN,  
DARIN HOFFMIRE, CHAD SCHAIVE, DYLAN WEMPEN, TONY KITTLE,  
GABRIELLE RIFE, STEVEN PAPROCKI, SHAWN CUPI, DR. BRANDON COMBS,  
JESSE ADKINSON, STEVE ARNSMAN, CORTNEY HARRIS, DOROTHY J. KAZUK,  
ADAM COPOT, DAVID TAYLOR, TRACY CHAPPELL, TERESA REYNOLDS, PIOTR  
WOJTANOWICZ, ADAM MCCURDY, KELVIN WORKER, DAVID JACKSON,  
FERNANDO BASULTO JR, SEAN JELINEK, ERIC RADLIFF, GALE GOWER JR,  
DOLORES MARLEY, ROBERT MUNCER, GERARDO RIVERA, SHAWN BUEHLER,  
ERIC HOLMAN, ROGER FREUND, KEVIN NANCE, JOSEPH STEINKE, ROBERT  
PALUMBO, PAWEL WOJEWODA, KYLE GRIEFF, RYAN GRIEFF, KURT A  
UNDERWOOD SR, MAYCEL YOUSEF, JOSEPH LYNN, RALPH COX II, DANIEL  
CARPENTER, JUSTIN LANGLOIS, CON CAMPBELL, RONALD SCHNEEMAN,  
KENNETH THORNE II, MATTHEW SCHROCK, LUANNE THORNE, THOMAS  
MORRIS, ARTHUR BECKER, WILLIAM MUHICH, JOHN RILEY, DOUG KLEIN,  
MOHAMMAD ATIQ, ALAN SCHROCK, JACK HARPER, JANET SCHAHL, AARON  
ZANE, WALTER SANFORD, THOMAS PETROFF JR, ALFONSO DIAZ, TIMOTHY  
LANE, WILLIAM PINDOZZO, MATTHEW HERZIG, KERRY SCHOTT, JEFFREY  
KILBURG, MICHAEL GIESE, MARGARET TORPHY, CHARLES FRIEND, RANDY  
PARKER, STEVEN PROHASKA, RANDAL HODGSON, LEONARD GAVET,  
WILLIAM BAUMHEUTER, CHRISTOPH SCHOEPFER-GROSSKURTH, GREG  
WYLAND, WARREN NEUMAN, MARK FRIEDERS, RANDY CURTIS, BRIAN  
GARRETT, ANGEL RIVERA, JOHN JONES, JAMES ELLIS, DONALD SCHREINER

JR, LORI NELSON, JOHN BOGUCKI, KENT ZBINDEN, ANDREW MERKLE, MARK COBETTO, KEVIN WALDEN, CATLIN ARNOLD, MICHAEL NORTON, STEVEN BARBEE, ANTHONY CAIN, STEVEN VAUGHN, ROBERT MORAN, DANIEL LYONS, RENEE NORTON, DARBY SABO, WILLIAM HJERTSTEDT, MICHAEL EDLIN, NICHOLAS WOODY, TIMOTHY SWEET, JOSHUA JACOBS, TOBE FULFORD III, GREGORY RITTER, JOSH WALKER, TONY BURDEN, PETER JEGLINSKI, CAROLYN M. HOLLAR, JONATHAN WILLS, JOSHUA SITZMORE, CHRISTOPHER CARRIER, KENNETH DALKE, WILLIAM ZELLER, JAKE MACIEJEWSKI, ARTEM GAVRANIN, GLENN LEONARDO, DEBRA GILBERT, ZACHARY RITTER, MORGAN DONOVAN, CHRISTOPHER SPRACKLIN, WIESLAW GAL, LESZEK GASKA, JOHN SUJAK, NICK STEIN, GUY BLAKE, JERALD TARBLE, PHILIP GRABBE, CHRISTOPHER LEER, HUNTER LEWIS, MATTHEW SCHAAL, JOHN ARNDT, NIKOLA LOHJA, JAMES TIPTON, THOMAS KOEHNE, TOBEY RICE, DAVID JANUSZ, ERIC GORDON, JACOB HUTSON, LOGAN SCHERTZ, DWAYNE BECCUE, PETER GAMBANI, RYAN HARPER, MATTHEW CHAFFIN, MARC CAIN, CESAR ALEXANDER ZURITA, ISRAEL SILTMAN, KARL HUCKSHOLD, LYNDELL WAGGENER, JOEL MARCHIO, MARK WARNECKE, NORBERTO QUINTANAR, KENNETH SPIER, GARY LIND, KIM GRABBE, TROY BUCCINI, MICHAEL CLARK, DANIEL R. KEELE, CATHERINE GRAY, LAWRENCE CLAVEL, LARRY MORGAN, JASON GASCOIGNE, JONATHON KOHL, DAN MAGEE, GAVIN YEDNOCK, NATHAN HAUERT, EDWARD MCGLADE, ERIK JOHNSON, THOMAS KENT, DOUGLAS CAMPBELL, GREGORY SAPP, KATIE DEANESCHLOTTMAN, MICHAEL MOFFITT, EILEEN HUBER, CHRIS WHITE, RYAN GARRETT, MICHAEL WRIGHT,

MICHAEL BAUMANN, PAUL REES, SHAUN UNELL, DEREK BRANDT, STEPHANIE RANDALL, JOSEPH HULSEY, MICHAEL SHANNON, JOSH WELKER, STEVE DUNCAN, RON GRUBB, MICHAEL PETERS, JEFFREY BENTLEY, JEBIDIAH SMAIL, DANIEL DOTY, MATTHEW ZALLER, JEREMY JONES, BRADLEY COPPEDGE, BRIAN HARTONG, CHRISTOPHER BURKETT, DAVID GRESSEL, STACI DUNCAN, JEFF BECKMANN, JEFFREY DENIS, TYLER LEWIS are residents and citizens of the State of Illinois who, *inter alia*, possess or otherwise desire to deliver, sell, import, or purchase an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge and/or manufacture, deliver, sell, or purchase large capacity ammunition feeding devices as defined in 720 ILCS 5/24-1.9(a) and/or 720 ILCS 5/24-1.10(a).

**PARTY DEFENDANTS**

3. Defendant Jay Robert Pritzker is the duly elected Governor of the State of Illinois. Under Article V, Section 8 of the Illinois Constitution, the Governor “shall have the supreme executive power and shall be responsible for the faithful execution of the laws.” Ill. Const. 1970, art. V, § 8.
4. Defendant Emmanuel Christopher Welch is the duly elected Speaker of the Illinois House of Representatives.
5. As Speaker of the House, Defendant Welch certified that all procedural requirements for the passage of HB 5471 were met.
6. Defendant Don Harmon is the duly elected president of the Illinois Senate.
7. As president of the Senate, Defendant Harmon certified that all procedural requirements for the passage of HB 5471 were met.
8. Defendant Kwame Raoul is the duly elected Attorney General of the State of Illinois.

9. As Attorney General, he has publicly proclaimed he will enforce the provisions of HB 5471 against the citizens of Illinois. (See [https://www.thecentersquare.com/illinois/attorney-general-says-if-sheriffs-wont-enforce-gun-ban-there-are-other-people-there-to/article\\_8b6d435c-938f-11ed-bf51-3b89f7f861d3.html](https://www.thecentersquare.com/illinois/attorney-general-says-if-sheriffs-wont-enforce-gun-ban-there-are-other-people-there-to/article_8b6d435c-938f-11ed-bf51-3b89f7f861d3.html))
- <https://www.mystateline.com/news/illinois-ag-echoes-pritzkers-threat-to-fire-police-for-not-enforcing-gun-ban/>

### **FACTUAL BASIS**

10. House Bill 5471, referred to as the “INS CODE-PUBLIC ADJUSTERS” (hereinafter “HB 5471” or “Public Act 102–116”) was originally introduced in the Illinois House of Representatives by Representative Dagmara Avelar on January 28, 2022. (See Exhibit B)
11. The title of the bill a introduced is “An Act concerning Regulation”. (See Exhibit C)
12. The act of regulating; a rule or order prescribed for management or government; a regulating principle; a precept. (See <https://thelawdictionary.org/regulation/>)
13. As introduced, HB 5471 consisted of approximately nine (9) pages and sought to amend very modestly provisions of Illinois Insurance Code regarding insurance contracts. *Id.*
14. The synopsis for HB 5471 as introduced indicated that, the subject of the bill was focused on providing the e-mail address of the adjuster as well as other provisions regarding an insurance contract. *Id.*
15. HB5471 received three (3) readings in the House and was passed on March 04, 2022. (See Exhibit B)
16. HB 5471 arrived in the Senate March 07, 2022. *Id.*
17. The first reading of HB 5471 in the Senate occurred on March 07, 2022, where it was referred to the Assignments Committee. *Id.*

18. The second reading of HB5471 in the Senate occurred on November 30, 2022 wherein it was placed on the calendar for a third reading on December 01, 2022. *Id.*
19. On or about January 08, 2023, which was a Sunday afternoon at 3:00 P.M., before the third reading occurred in the Senate, Senator Don Harmon filed Senate Floor Amendment No.1 which completely stripped the insurance provisions of the bill, which were being considered by the legislature all the way up until this time, and completely replaced them with new substantive proposed changes governing weapons, human and drug trafficking. (See Exhibit D)<sup>2</sup>
20. The next day on January 9, 2023, Amendments 2,3,4,5 were presented in the Senate which amendments did not significantly deviate from the first amendment. (See Exhibit B)
21. On January 9, 2023, the amendments passed the Senate and the matter was sent back to the House on January 10, 2023. *Id.*
22. The final version of HB 5471 as amended by the Senate is attached hereto as Exhibit E.
23. According to the Senate amendment's synopsis, the bill now dealt with various topics such as Amends the Illinois State Police Law of the Civil Administrative Code of Illinois. Provides that the Division of Criminal Investigation of the Illinois State Police shall conduct other investigations as provided by law, including, but not limited to, investigations of human trafficking, illegal drug trafficking, and illegal firearms trafficking. Provides that the Division of Criminal Investigation shall provide statewide coordination and strategy pertaining to firearm-related intelligence, firearms trafficking interdiction, and investigations. Amends the

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<sup>2</sup> The Court might ask itself why the Defendants chose HB 5471 to engage in this gamesmanship. Luck of the draw perhaps? Or could it be when they searched the record for an otherwise innocuous bill to "gut and replace" they found one which just happen to have as co-sponsors the new incoming Republican House Minority Leader as well as the incoming Republican House Deputy Minority Leader? Were the Defendants seeking out opportunity to create political fodder against these new minority leaders of the House? Assuredly, the People's representatives don't engage in such behavior!

Firearm Owners Identification Card Act. Provides that a petitioner may request a plenary firearms restraining order of up to one-year, but not less than 6 months (rather than 6 months). Provides that the order may be renewed for an additional period of up to one year. Amends the Criminal Code of 2012. Provides that beginning January 1, 2024, it is unlawful for any person within the State to knowingly possess an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge, with exemptions, and provides penalties. Provides that it is unlawful for any person within the State to knowingly manufacture, deliver, sell, purchase, or cause to be manufactured, delivered, sold, or purchased a large capacity ammunition feeding device, with specified exemptions, and provides penalties. Contains a severability provision. Amends the Freedom of Information Act. Exempts from disclosure under the Act certain information concerning endorsements received by the Illinois State Police. (See Exhibit B)

24. After these voluminous amendments were made by the Senate, the subject of HB 5471 no longer addressed the issue of insurance adjusters and their contracts, as its new subject was now modifying completely different laws regarding weapons, human and drug trafficking.
25. After returning to the House, HB 5471 was not three times before voting to pass it.
26. On January 10, 2023, within a few hours after the House merely voted to concur with the Senate amendments Governor Pritzker signed Public Act 102-1116, which ironically is titled Insurance Code Public Adjusters, into law. (See Exhibit B)
27. On or about January 17, 2023, a similar matter as the one presented herein was filed and argued in the 4<sup>th</sup> Judicial Circuit of Effingham County. (See Cause 2023-MR-004 of the 4<sup>th</sup> Judicial Circuit Effingham County)
28. A hearing on the request of a restraining order was heard by the Honorable Judge Joshua Morrison on January 18, 2023. (See attached transcript of said hearing attached as Exhibit F)



29. After the circuit court heard argument of Plaintiff’s counsel as well as argument of Defendant’s counsel for Governor Pritzker, and AG Kwame Raoul, Judge Morrison issued a restraining order enjoining the Defendants from enforcing HB 5471 against the named Plaintiffs therein. (See attached order of the 4<sup>th</sup> Judicial Circuit Judge Morrison attached as Exhibit G) <sup>3</sup>

**COUNT I**  
**DECLARATORY JUDGMENT**  
**THE ACT VIOLATES THE SINGLE ISSUE RULE OF**  
**THE ILLINOIS CONSTITUTION**

30. Plaintiffs incorporate paragraphs 1 through 29 as if each had been specifically plead herein.
31. Plaintiffs have a right to insist their fundamental rights are not impaired by the Defendants due to their engaging in lawmaking which violates Article IV, Section 8 of the Illinois Constitution.
32. Article IV, Section 8 of the Illinois Constitution provides in pertinent part: "Bills, except bills for appropriations and for the codification, revision or rearrangement of laws, shall be confined to one subject." (See Ill. Const. 1970, art. IV, § 8(d)).
33. Because the single subject rule is a substantive rather than procedural requirement for the passage of bills, an alleged violation of the rule is subject to judicial review. *Johnson v. Edgar*, 176 Ill. 2d 499, 514 (1997) (*citing, People v. Dunigan*, 165 Ill.2d 235 (1995)).
34. The single subject rule ensures the structured and well-informed debate and passage of bills by “limiting each bill to a single subject, so each legislator can better understand and more intelligently debate the issues presented by a bill.” *People v. Cervantes*, 189 Ill. 2d 80, 83-84 (1999) (*citing People v. Reedy*, 295 Ill. App. 3d 34 (2d Dist. 1999)).
35. The single subject requirement, therefore, “ensures that the legislature addresses the difficult

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<sup>3</sup> Defendants Speaker Welch and President Harmon failed to appear and be heard at the hearing of January 18, 2023.

decisions it faces directly and subject to public scrutiny” *Cervantes* 189 Ill.2d at 84 (citing, *Johnson v. Edgar*, 176 Ill.2d 499 (1997)).

36. In addition to preventing logrolling, the single subject rule also facilitates the enactment of bills through an orderly and informed legislative process. *People v. Olender*, 222 Ill.2d 123 (Ill. 2005) <sup>4</sup>

37. A public act that violates the single subject rule is not severable; rather, the entire public act is unconstitutional and thus void. *Reedy*, 295 Ill. App. 3d at 42.

38. The subject may be as broad as the legislature chooses. *People v. Boclair*, 202 Ill.2d 89, 109, 273 Ill.Dec. 560, 789 N.E.2d 734 (2002); *Johnson*, 176 Ill.2d at 515, 224 Ill.Dec. 1, 680 N.E.2d 1372.

39. However, “while the legislature is free to choose subjects comprehensive in scope, the single subject requirement may not be circumvented by selecting a topic so broad that the rule is evaded as ‘a meaningful constitutional check on the legislature's actions.’” (Emphasis Added) *Boclair*, 202 Ill.2d at 109, 273 Ill.Dec. 560, 789 N.E.2d 734 (quoting *Johnson*, 176 Ill.2d at 515–18, 224 Ill.Dec. 1, 680 N.E.2d 1372).

40. Here HB 5471 originated with a subject called “an act regarding regulation.”

41. By definition, the subject of regulation is so broad it could encompass any subject matter for which the Defendants might consider passage.

42. HB 5471 originated as an act making very modest changes Illinois Insurance Code regarding contracts.

43. From its origination until two days before its passage, the nature and character of the act remained the same as it made its way through the public and deliberative process of the

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<sup>4</sup> Now is as a good a time as any to point out to the Court that nothing about the way HB 5471 was passed into law was orderly or informed as required by constitutional precept.

legislature.

44. The amendments made just two days before its passage had no logical or natural connection to the original act as they vitiated the original insurance provisions as presented on January 28, 2022 and replaced them with numerous unrelated subjects as compared to the original act.
45. Moreover, the subjects for which the amendments modified HB 5471 included, but were not limited to;
- a) Ordered the criminal investigations unit to conduct investigations regarding human trafficking, illegal drug trafficking and illegal firearms tracking;
  - b) Amended the law regarding the procurement of bids for certain services related to purchases of certain technology by the Illinois State Police;
  - c) Modifies the provision of firearms restraining orders;
  - d) Created new provisions in the law regarding the ban on certain semi-automatic weapons
46. First, the Court should declare the single subject of “an act regarding regulation” is so broad that it renders meaningless the constitutionally mandated check on the legislature as required by Article IV, Section 8 of the Illinois Constitution.
47. The subject of regulation is so broad that allows the legislature to “gut and replace” bills without limitation on any subject they choose.<sup>5</sup>
48. Secondly, the Court should declare the act as it originated and the amendments have no logical relation to one another and as such HB 5471 is violative of Article IV, Section 8 of the Illinois Constitution.

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<sup>5</sup> The phrase “gut and replace” is commonly used by those involved in Illinois politics in referring to the unfortunate practice of the legislature waiting until the last minute of grabbing ahold of a bill which has almost completed the procedural requirement of becoming a law and vitiating all the bills content which existed up until that point and wholly replacing it with a confrontational subject which the legislature desires to pass at the last minute without any meaningful public debate or scrutiny. It’s an abhorrent method of excluding the public from participating in lawmaking so they might have a meaningful opportunity to make their voices heard to representatives.

49. The Defendants cannot ignore the fact that the original subject of HB 5471 has no logical relation to the amendments merely because they chose to redact the original subject in its totality.
50. Even comparing the provision of the Amendments to one another would be a futile act for the Court as the generic term regulation means nothing of substance for which it might compare specific provisions within the amendments. .
51. By engaging in such gamesmanship in violation of the single subject rule, the Defendants rendered the single subject rule meaningless which forecloses the Plaintiffs elected representatives, or themselves for that matter, the opportunity to scrutinize legislation and materially participate in the legislative process.
52. An actual controversy exists between the Parties which would be terminated in whole or in part by a declaratory judgment.
53. An immediate and definitive determination is necessary to clarify the rights and interests of all parties affected.

WHEREFORE, Plaintiffs, herein request that this court enter an Order:

- A. Plaintiffs pray this Honorable Court declare Public Act 102-116 unconstitutional as violative of the single subject rule given the subject is so broad that it has rendered meaningless the constitutionally mandated check on the legislature as required by Article IV, Section 8 of the Illinois Constitution;
- B. Plaintiffs pray this Honorable Court declare Public Act 102-116 unconstitutional as violative of the single subject rule given the subject of the act as introduced as a modification of the Illinois Insurance Code bears no logical relation to the subjects of the amendments;
- C. That the Court grant such other and further relief as is just and proper.

**COUNT II**  
**DECLARATORY JUDGMENT**  
**THE ACT VIOLATES THE THREE READINGS CLAUSE**  
**OF THE ILLINOIS CONSTITUTION**

54. Plaintiffs incorporate paragraphs 1 through 53 as if each had been specifically plead herein.
55. Plaintiffs have a right to insist their fundamental rights are not impaired by the Defendants due to their engaging in lawmaking which violates Article IV, Section 8 of the Illinois Constitution.
56. Article IV, Section 8 of the Illinois Constitution provides, in pertinent part, that “a bill shall be read by title on three different days in each house.” Ill. Const. 1970, art. IV, § 8(d).
57. The Three Readings rule applies not only to the original bill, but to amendments when they represent a substantial departure from the original bill.
58. “In *Giebelhausen v. Daley*, 407 Ill. 25, 48 (1950), our supreme court held that the "complete substitution of a new bill under the original number, dealing with a subject which was not akin or closely allied to the original bill, and which was not read three times in each House, after it has been so altered, [was a] clear violation of a similar three-readings rule in the 1870 Constitution. *See* Ill. Const. 1870, art. IV, § 13 (“Every bill shall be read at large on three different days, in each house\*\*\*.”).” *Doe v. Lyft, Inc.*, 2020 IL App (1st) 191328, ¶ 53 (1st Dist. 2021).
59. As more fully laid out in this matter, the amendments made to HB 5471 by the Senate represented an absolute departure from the original bill which originated in the House.
60. The Senate amendments constituted a total substitution of the original HB 5471, which subjects the amendments to the Three Readings rule in the Senate as well as the House.
61. In essence, HB 5471 was only read one time in the Senate after the amendments, and it was not read at all in the House.

62. Plaintiffs acknowledge that a challenge to legislation under the Three Readings rule provided in Art. IV, Section 8(d) implicates the Enrolled Bill doctrine, which provides that, once the Speaker of the House and President of the Senate certify that the procedural requirements for passing legislation have been met, there is a presumption the procedural requirements have been satisfied.
63. However, Plaintiffs do not concede this ends the inquiry and affirmatively assert that the Enrolled Bill Doctrine must fall as it cannot be reconciled with Art. IV, Section 8(d) and our Illinois Court made it clear continued abuses of this constitutional requirement would result in the Courts stepping in.
64. Any further deference under the Enrolled Bill Doctrine by the Courts allows the General Assembly to blatantly and systematically continue its subversion of this unambiguous constitutional mandate by certifying, with no discernable standards, penalty, or review, that it has complied with Art. IV, Section 8 when unequivocal violations are in plain sight. <sup>6</sup>
65. The Enrolled Bill Doctrine has been subject to significant abuse by the General Assembly, which has not escaped the notice of the Supreme Court. In *Geja's Cafe v. Metro. Pier & Exposition Auth.*, 153 Ill. 2d 239, 260 (1992), the Supreme Court explained that, “if the General Assembly continues its poor record of policing itself, we reserve the right to revisit this issue on another day to decide the continued propriety of ignoring this constitutional violation.” In *Friends of Parks v. Chicago Park Dist.*, 203 Ill. 2d 312, 329 (2003), the Illinois Supreme Court reiterated this concern, citing previous instances where it “noted . . . that the legislature had shown remarkably poor self-discipline in policing itself in regard to the three-readings

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<sup>6</sup> How much longer are the Courts of this State going to sit idly by and allow the legislature to violate the Constitution? What more is it going to take before the Court puts an end to this abuse? Is it time now given the legislature is attacking fundamental constitutional rights by engaging in such blatant abuse of Constitutional safeguards?

requirement.”<sup>7</sup>

66. The passage of HB 5471 provides the perfect example of why the Court must abandon the Enrolled Bill doctrine. A simple and likely uncontroversial insurance regulation bill was gutted and replaced by the Senate at the last moment into a final product that bore no resemblance to the original material, thereby creating a new bill that contains significant impairments to a fundamental constitutional right, and then it simply passed in the House by concurrence without any opportunity for any meaningful public debate or deliberation of any sort.
67. The record of proceedings reflects not only did the Senate amendments receive one (1) reading in the Senate, but upon return to the House it received no readings on the amended bill and was simply called for a vote on the concurrence.
68. Therefore, it will be beyond contest in this matter that a Three Readings violation has occurred.
69. Given the General Assembly's demonstrated inability, which has lasted decades, to police themselves on the matter, and given fundamental constitutional rights are now being infringed upon by this abuse, the Enrolled Bill Doctrine must be abrogated in the public interest and in furtherance of the original purpose of the Three Readings clause.
70. An actual controversy exists between the Parties which would be terminated in whole or in part by a declaratory judgment.
71. An immediate and definitive determination is necessary to clarify the rights and interests of all parties affected.

WHEREFORE, Plaintiffs, herein request that this court enter an Order:

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<sup>7</sup> The Illinois Supreme Court has left the door wide open for the Courts to intervene with the legislatures continued abuse of the clear disregard for the Illinois Constitution. It is time for the Court to step up and put an end to this practice which is now being used to invade the most sacred of fundamental rights held by its citizens.

- A. Plaintiffs pray this Honorable Court declare Public Act 102-116 unconstitutional as violative of the Three Readings Rule as required by Article IV, Section 8 of the Illinois Constitution;
- B. That the Court grant such other and further relief as is just and proper.

**COUNT III**  
**DECLARATORY JUDGMENT**  
**HB 5471 VIOLATES THE DUE PROCESS CLAUSE**  
**OF THE ILLINOIS CONSTITUTION**

- 72. Plaintiffs incorporate paragraphs 1 through 71 as if each had been specifically plead herein.
- 73. Plaintiffs have a right to insist their fundamental rights are not impaired by the Defendants due to their engaging in lawmaking which violates Article I, Section 2 of the Illinois Constitution.
- 74. Article I, Section 2 of the Illinois Constitution provides in pertinent part: " No person shall be deprived of life, liberty or property without due process of law of the laws. " Ill. Const. 1970, art. I, § 2.
- 75. When government action depriving a person of life, liberty, or property survives substantive due process scrutiny, it must still be implemented in a fair manner. *People. v. Barker*, 2021 IL App (1st) 192588, 188 N.E.3d 21, 453 Ill.Dec. 549.
- 76. The due process clause protects fundamental fairness and justice. *Lyon v. Department of Children & Family Services*, 209 Ill.2d 264, 282 Ill.Dec. 799, 807 N.E.2d 423 (2004).
- 77. The guarantee of due process of law extends to every governmental proceeding which may interfere with personal or property rights, whether the process be legislative, judicial, administrative, or executive. *People ex rel. Harris v. Parrish Oil Production, Inc.*, 249 Ill.App.3d 664, 622 N.E.2d 810, 190 Ill.Dec. 780
- 78. Due process of law is a conception of fundamental justice and is not satisfied by merely formal procedural correctness. *People v. Dugan*, 401 Ill. 442, 82 N.E.2d 482 (1948)



79. The proposition that a person shall not be deprived of life, liberty, or property without due process of law is as old as any principle of civilized government and is found in the Magna Charta and in substance, if not in form, in nearly all constitutions adopted by the several States. *Id.*
80. “Procedural due process claims challenge the constitutionality of the specific procedures used to deny a person's life, liberty, or property.” *People v. Cardona*, 2013 IL 114076, ¶ 15, 369 Ill.Dec. 117, 986 N.E.2d 66
81. Due process requires, at minimum, a meaningful opportunity to be heard. *Colquitt v. Rich Township High School District No. 227*, 298 Ill. App. 3d 856, 863, 232 Ill.Dec. 924, 699 N.E.2d 1109 (1998).
82. Classification of the right affected dictates the level of scrutiny to be applied by a reviewing court in determining whether the statute in question is in accordance with the constitution. *Napleton v. Village of Hinsdale*, 229 Ill. 2d 296, 307, 322 Ill.Dec. 548, 891 N.E.2d 839 (2008).
83. When determining whether a statute violates constitutional guarantees of due process, a reviewing court must first determine the nature of the right upon which the statute allegedly infringes. *People v. Beard*, 366 Ill. App. 3d 197, 200, 303 Ill.Dec. 243, 851 N.E.2d 141 (2006)
84. Where the right infringed upon is a fundamental right, the statute is subject to strict scrutiny analysis. *Id.*
85. In order to survive strict scrutiny, the measures employed by the government body must be necessary to serve a compelling state interest and must be narrowly tailored to it. *Napleton*, 229 Ill. 2d at 307, 322 Ill.Dec. 548, 891 N.E.2d 839.

86. In this case, Plaintiffs were denied any meaningful opportunity to participate in the passage of HB 5471 which attempts to materially impair their fundamental rights to bear arms.
87. As a result of these due process violations, Plaintiff's fundamental rights to bear arms have been impaired as guaranteed by Ill. Const. 1970, art. I, § 22.
88. Plaintiffs have due process rights which demand orderly proceedings based upon clearly established constitutional safeguards before their fundamental rights might be impaired.
89. The due process violation being complained of herein is the complete and total failure of the Defendants to comply with express constitutional procedural guarantees afforded the Plaintiffs under Ill. Const. 1970, art. IV, § 8(d).
90. The subversive procedures engaged in by the Defendants were completely calculated to be a workaround to these constitutional procedural guarantees.
91. First, the Defendants have completely ignored the constitutional procedural rights of Plaintiffs in regard to the single issue rule of the Illinois Constitution.
92. On or about January 28, 2022, HB 5471 began as a subject of an innocuous insurance regulation which as a result passed through the Illinois House of Representatives, and almost all the way through the Senate, bearing no semblance to any potential impairment of Plaintiffs fundamental rights to bear arms guaranteed under Ill. Const. 1970, art. I, § 22.
93. Without warning or notice, the Defendants struck with their amendments which completely altered the subject of HB 5471 from an innocuous insurance regulation into a significant weapons ban bill which cut at the heart of Plaintiffs fundamental and inalienable rights to bear arms.
94. Then less than 48 hours later on January 10, 2022, HB 5471 was signed by Governor Pritzker into law.

95. From its origination on January 28, 2022, until its passage on January 10, 2023, HB 5471 was in the public eye for 347 days.
96. For 345 days of its existence, its subject was one of insurance regulation that had no logical connection or relevance to any sort of impairment on fundamental rights to bear arms.
97. Just two days before its passage, the amendments wholly changed the subject and character of HB 5471.
98. By utilizing a subject of “regulation” the Defendants subdued the Plaintiffs as to what might lie ahead within this bill, and thereby rendered the single subject requirement of the Illinois Constitution a meaningless safeguard of Plaintiff’s due process rights.
99. Secondly, notwithstanding the abuses engaged in by Defendants regarding the use of the generic subject of regulation, there is no meaningful or logical connection between insurance regulation and regulations on weapons, drugs and human trafficking. <sup>8</sup>
100. As required by the Illinois Constitution, HB 5471 was read three times in the House of Representatives when its subject was that of insurance regulation; it was also read twice in the Senate as an insurance regulation.
101. After the “gut and replace” on January 08, 2022, the new subject of the HB 5471, being that in regard to weapons, drugs and human trafficking, was only read one time.
102. While the enrolled bill doctrine has until now been a shield for the Defendants to engage in this practice against attacks brought under Ill. Const. 1970, art. IV, § 8(d) such as in Count II, the Defendants are not protected by such precedent for claims brought under the due process

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<sup>8</sup> The use of the word “regulation” as the subject for a bill is clearly for the purpose of the Defendants to alter the substance of a bill to whatever they choose at the last moment. This abuse of process allows Defendants to quietly present a “shell bill” up to the point to the end of the legislative process without any concern being taken for months by the citizens of the state and then at the last moment the Defendants gut and replace the subject to something wholly unrelated to the originating subject. Due process of law must demand more of the Defendants or otherwise the legislative process of providing the citizens notice and to materially participate in government as guaranteed by the constitution is rendered meaningless.

clause as provided in Ill. Const. 1970, art. I, § 2.<sup>9</sup>

103. The complete disregard of the single subject rule and the three readings rule by the Defendants evidence violations of the due process safeguards afforded Plaintiff's under Ill. Const. 1970, art. I, § 2.

104. Separate and apart from the claims raised by Plaintiffs under Ill. Const. 1970, art. IV, § 8(d) are independent violations of the due process guarantees afforded Plaintiffs under Ill. Const. 1970, art. I, § 2.

105. An actual controversy exists between the Parties which would be terminated in whole or in part by a declaratory judgment.

106. An immediate and definitive determination is necessary to clarify the rights and interests of all parties affected.

WHEREFORE, Plaintiffs, herein request that this court enter an Order:

A. Plaintiffs pray this Honorable Court declare Public Act 102-116 unconstitutional as violative of Due Process as required by Article I, Section 2 of the Illinois Constitution;

B. That the Court grant such other and further relief as is just and proper.

**COUNT IV**  
**DECLARATORY JUDGMENT**  
**720 ILCS 5/24-1.9 AND 720 ILCS 5/24-1.10 OF HB 5471 VIOLATE THE**  
**EQUAL PROTECTION CLAUSE OF THE ILLINOIS CONSTITUTION**

107. Plaintiffs incorporate paragraphs 1 through 106 as if each had been specifically plead herein.

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<sup>9</sup> A challenge to the Three Readings Rule under Article IV, Section 8(d) is separate and apart from any claim brought under due process, as this claim alleges a separate and independent constitutional violation as guaranteed under Article I, Section 2. Furthermore, as argued herein, it is far past time the Court put an end to the abuses of the Three Readings Rule and no longer allow the Enrolled Bill Doctrine to be blanket cover for these egregious violations.

108. Plaintiffs have a right to insist their fundamental rights are not impaired by the Defendants due to their engaging in lawmaking which violates Article I, Section 2 of the Illinois Constitution.
109. Article I, Section 2 of the Illinois Constitution provides in pertinent part: " No person shall be deprived of life, liberty or property without equal protection of the laws. " Ill. Const. 1970, art. I, § 2.
110. HB 5471 added the following provision to the Illinois Criminal Code.
- Sec. 24-1. Unlawful use of weapons. (a) A person commits the offense of unlawful use of weapons when he knowingly:
- (15) Carries or possesses any assault weapon or .50 caliber rifle in violation of Section 24-1.9; or
  - (16) Manufactures, sells, delivers, imports, or purchases any assault weapon or .50 caliber rifle in violation of Section 24-1.9.
- (See 720 ILCS 5/24-1(15) and 720 ILCS 5/24-1(16))
111. A person convicted of 720 ILCS 5/24-1(15) commits a Class A misdemeanor on their first offense and a Class 3 felony on any subsequent offense.
112. A person convicted of 720 ILCS 5/24-1(16) commits a Class 3 felony.
113. The definition of what constitutes an assault weapon is defined in the statute at 720 ILCS 5/24-1.9(a).
114. Except as provided in subsections (c), (d), (e), on or after the effective date of the amendatory act, it is unlawful for any person within this state to knowingly manufacture, deliver, sell, import, or purchase or cause to be manufactured, delivered, sold, imported, or purchased by another, an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge. (See 720 ILCS 5/24-1.9(b)).

115. Except as provided in subsection (d), beginning January 01, 2024, it is unlawful for any person in this state to knowingly possess an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge. (See 720 ILCS 5/24-1.9(c)).
116. As of January 01, 2024, a person may possess assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge only if the person has by January 01, 2024 provided the Illinois State Police an endorsement affidavit as prescribed by the law. (See 720 ILCS 5/24-1.9(d)).
117. The endorsement affidavit requires the person to attest they either owned the assault weapon prior to the passage effective date of this act or otherwise inherited it from an authorized person. *Id.*
118. The endorsement affidavit must include the make, model and serial number of the assault weapon. *Id.*
119. Furthermore, beginning 90 days from the effective date of this amendatory Act of the 102nd General Assembly, a person may only possess an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge, at the following locations:
- a) on private property owned or immediately controlled by the person;
  - b) on private property that is not open to the public with the express permission of the person who owns or immediately controls such property;
  - c) while on the premises of a licensed firearms dealer or gunsmith for the purpose of lawful repair;
  - d) while engaged in the legal use of the assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge at a properly licensed firing range or sport shooting competition venue; or
  - e) while traveling to or from these locations, provided that the assault weapon, assault weapon attachment, or .50 caliber rifle is unloaded and the assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge is enclosed in a case, firearm carrying box, shipping box, or other container.

(See 720 ILCS 5/24-1.9(d)).

120. Beginning January 01, 2024, a person with the endorsement affidavit for an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge, can only transfer to the following:

- a) persons authorized under subdivisions (1) through (5) of subsection (e);
- b) to an heir;
- c) an individual residing in another state;
- d) a licensed firearms dealer.

(See 720 ILCS 5/24-1.9(d)).

121. The provision of this Section regarding the purchase or possession of assault weapons, assault weapons attachments, .50 caliber rifles, and .50 caliber cartridges, as well as those provisions of this Section that prohibit causing those items to be purchased or possessed, do not apply to:

- 1) peace officers as defined by Section 2-13 of this Code.
- 2) Qualified law enforcement officers and qualified retired law enforcement officers as defined in the Law Enforcement Officers Safety Act of 2004 (18 U.S.C. 926B and 926C) and as recognized under Illinois law.
- 3) Acquisition and possession by a federal, State, or local law enforcement agency for the purpose of equipping the agency's peace officers as defined in paragraph (1) or (2) of this subsection (e).
- 4) Wardens, superintendents, and keepers of prisons, penitentiaries, jails, and other institutions for the detention of persons accused or convicted of an offense.

- 5) Members of the Armed Services or Reserve Forces of the United States or the Illinois National Guard, while performing their official duties or while traveling to or from their places of duty. <sup>10</sup>
- 6) Any company that employs armed security officers in this State at a nuclear energy, storage, weapons, or development site or facility regulated by the federal Nuclear Regulatory Commission and any person employed as an armed security force member at a nuclear energy, storage, weapons, or development site or facility regulated by the federal Nuclear Regulatory Commission who has completed the background screening and training mandated by the rules and regulations of the federal Nuclear Regulatory Commission and while performing official duties.
- 7) Any private security contractor agency licensed under the Private Detective, Private Alarm, Private Security, Fingerprint Vendor, and Locksmith Act of 2004 that employs private security contractors and any private security contractor who is licensed and has been issued a firearm control card under the Private Detective, Private Alarm, Private Security, Fingerprint Vendor, and Locksmith Act of 2004 while performing official duties.

(See 720 ILCS 5/24-1.9(e)).

122. The provisions of this Section do not apply to the manufacture, delivery, sale, import, purchase, or possession of an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge or causing the manufacture, delivery, sale, importation, purchase, or possession of those items:

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<sup>10</sup> As the Court considers these exceptions, all of which violate equal protections, the ridiculousness of some of them will become apparent. A member of our military is exempt as long as he or she is in the service but must seemingly give up their rights after being discharged. However, a retired law enforcement officer can continue to exercise their rights their whole life. One can't even begin to appreciate the absurdity of these types of distinguishing provisions until considering the possibility that one class of persons might have a better lobbying group than the other.



(A) for sale or transfer to persons authorized under subdivisions (1) through (7) of this subsection (e) to possess those items;

(B) for sale or transfer to the United States or any department or agency thereof; or

(C) for sale or transfer in another state or for export.

(See 720 ILCS 5/24-1.9(e)).

123. The definition of what constitutes large capacity ammunition feeding device is defined in the statute at 720 ILCS 5/24-1.10(a).

124. Except as provided in subsections (e) and (f), it is unlawful for any person within this State to knowingly manufacture, deliver, sell, purchase, or cause to be manufactured, delivered, sold, or purchased a large capacity ammunition feeding device. (See 720ILCS 5/24-1.10(b)).

125. Except as provided in subsections (d), (e), and (f), and beginning 90 days after the effective date of this amendatory Act of the 102nd General Assembly, it is unlawful to knowingly possess a large capacity ammunition feeding device. (See 720ILCS 5/24-1.10(c)).

126. Subsection (c) does not apply to a person's possession of a large capacity ammunition feeding device if the person lawfully possessed that large capacity ammunition feeding device before the effective date of this amendatory Act of the 102nd General Assembly, provided that the person shall possess such device only:

a) on private property owned or immediately controlled by the person;

b) on private property that is not open to the public with the express permission of the person who owns or immediately controls such property;

c) while on the premises of a licensed firearms dealer or gunsmith for the purpose of lawful repair;

d) while engaged in the legal use of the large capacity ammunition feeding device at a properly licensed firing range or sport shooting competition venue; or

- e) while traveling to or from these locations, provided that the large capacity ammunition feeding device is enclosed in a case, firearm carrying box, shipping box, or other container.

(See 720ILCS 5/24-1.10(d)).

127. A person authorized under this Section to possess a large capacity ammunition feeding device may transfer the large capacity ammunition feeding device only:

- a) to an heir;
- b) an individual residing in another state maintaining it in another state;
- c) or a dealer licensed as a federal firearms dealer.

(See 720ILCS 5/24-1.10(d)).

128. The provision of this Section regarding the purchase or possession of large capacity ammunition feeding devices, do not apply to:

- 1) peace officers as defined by Section 2-13 of this Code.
- 2) Qualified law enforcement officers and qualified retired law enforcement officers as defined in the Law Enforcement Officers Safety Act of 2004 (18 U.S.C. 926B and 926C) and as recognized under Illinois law.
- 3) Acquisition and possession by a federal, State, or local law enforcement agency for the purpose of equipping the agency's peace officers as defined in paragraph (1) or (2) of this subsection (e).
- 4) Wardens, superintendents, and keepers of prisons, penitentiaries, jails, and other institutions for the detention of persons accused or convicted of an offense.
- 5) Members of the Armed Services or Reserve Forces of the United States or the Illinois National Guard, while performing their official duties or while traveling to or from their places of duty.

6) Any company that employs armed security officers in this State at a nuclear energy, storage, weapons, or development site or facility regulated by the federal Nuclear Regulatory Commission and any person employed as an armed security force member at a nuclear energy, storage, weapons, or development site or facility regulated by the federal Nuclear Regulatory Commission who has completed the background screening and training mandated by the rules and regulations of the federal Nuclear Regulatory Commission and while performing official duties.

7) Any private security contractor agency licensed under the Private Detective, Private Alarm, Private Security, Fingerprint Vendor, and Locksmith Act of 2004 that employs private security contractors and any private security contractor who is licensed and has been issued a firearm control card under the Private Detective, Private Alarm, Private Security, Fingerprint Vendor, and Locksmith Act of 2004 while performing official duties.

(See 720 ILCS 5/24-1.10(e)).

129. The provisions of this Section do not apply to the manufacture, delivery, sale, importation, purchase, or possession of large capacity ammunition feeding device:

A) for sale or transfer to persons authorized under subdivisions (1) through (7) of this subsection (e) to possess those items;

B) for sale or transfer to the United States or any department or agency thereof; or

C) for sale or transfer in another state or for export.

(See 720 ILCS 5/24-1.10(f)).

130. Sentence. A person who knowingly manufactures, delivers, sells, purchases, possesses, or causes to be manufactured, delivered, sold, possessed, or purchased in violation of this Section a large capacity ammunition feeding device capable of holding more than 10 rounds of

ammunition for long guns or more than 15 rounds of ammunition for handguns commits a petty offense with a fine of \$1,000 for each violation. (See 720 ILCS 5/24-1.10(g)).

131. At issue is the infringement of a right to bear arms as guaranteed by the Illinois constitution. Ill. Const. 1970, art. I, § 22.
132. The constitutional guarantee of equal protection requires that the government treat similarly situated individuals in a similar manner. *People v. Warren*, 173 Ill.2d 348, 361, 219 Ill.Dec. 533, 671 N.E.2d 700 (1996).
133. The analysis applied in assessing equal protection claims is the same under both the United States and Illinois Constitutions. *Nevitt v. Langfelder*, 157 Ill.2d 116, 124, 191 Ill.Dec. 36, 623 N.E.2d 281 (1993).
134. It does not preclude the State from enacting legislation that draws distinctions between different categories of people, but it does prohibit the government from according different treatment to persons who have been placed by a statute into different classes on the basis of criteria wholly unrelated to the purpose of the legislation. *Id.*
135. In reviewing a claim that a statute violates equal protection, the court applies different levels of scrutiny depending on the nature of the statutory classification involved. *Jacobson v. Department of Public Aid*, 171 Ill.2d 314 (1996)
136. Classifications based on race or national origin or affecting fundamental rights are strictly scrutinized. *Id.*
137. A fundamental right for the purpose of equal protection analysis consists of a right that lies “at the heart of the relationship between the individual and a republican form of nationally integrated government.” *People v. Shephard*, 152 Ill. 2d 489, (Ill. 1992).

138. In other words, a fundamental right is simply a right that is explicitly or implicitly guaranteed by either the Federal or State Constitution. *Id.*
139. The right to bear arms is a fundamental right. *McDonald v. City of Chicago, IL*, 561 U.S. 742 (2010).
140. To survive strict scrutiny in the equal protection context, as in due process analysis, the means employed by the legislature must be necessary to advance a compelling state interest, and the statute must be narrowly tailored to the attainment of the legislative goal. *In re R.C.*, 195 Ill.2d 291 (2001).
141. Under the strict scrutiny standard of review, a statute is not entitled to a presumption of constitutionality. *Estate of Hicks*, 174 Ill.2d 433 (1996).
142. Rather, the statute may be upheld only if the means employed by the legislature to achieve the stated goal were necessary to advance a compelling state interest. *Id.*
143. In addition, the statute must be narrowly tailored; that is, a statute incorporating a suspect classification will be upheld only if the legislature employed the least restrictive means consistent with attainment of the legislative goal. *Id.*
144. Here, the Defendants have chosen to create different categories of citizens who are subjected to the requirements of 720 ILCS 5/24-1.09 *et seq.* and 720 ILCS 5/24-1.10 *et seq.*
145. Within 720 ILCS 5/24-1.09(e) and 720 ILCS 5/24-1.10(e) are (7) seven enumerated classifications of persons who are exempt from compliance with restrictive provisions in those Sections regarding the assault weapon, assault weapon attachment, .50 caliber rifle, .50 caliber cartridge and large capacity ammunition feeding devices.
146. These exempt citizens are seemingly a protected class based upon their occupations.

147. These occupations include but are not limited to peace officers, current and retired law enforcement, prison guards, jailers, prison wardens, and prison superintendents.
148. Citizens who are employed in these professions do not have the statutory restrictions placed upon their individual rights in regard to assault weapons, assault weapons attachment, .50 caliber rifle, .50 caliber cartridge and large capacity magazine feeding devices.
149. It defies comprehension as to how Defendants could classify the Plaintiffs as a category of persons whose individual rights to bear arms must be restrained, but yet carve out a large class of persons who are wholly exempt based on their employment status.<sup>11</sup>
150. Plaintiffs rights to purchase, transfer, possess, deliver, sell and import assault weapons, assault weapon attachments, .50 caliber rifles, and .50 caliber cartridges have been all but eliminated by HB5471.
151. As for their continued possession of assault weapons owned at the time of passage of HB 5471, only if a Plaintiff chooses to register their firearm, may he or she lawfully possess it.
152. Even if registry does occur, he or she may only possess the firearm on certain private property or at a firing range or shooting competition.
153. However, if a person falls within those categories enumerated within 720 ILCS 5/24-1.09(e) and 720 ILCS 5/24-1.10(e), he or she is free as an individual to purchase, transfer, possess, deliver, sell and import assault weapons, assault weapon attachments, .50 caliber rifles, and .50 caliber cartridges at their pleasure, and further has no obligation to register them.

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<sup>11</sup> There is much to be said at some point regarding any alleged compelling public purpose which the Defendants may be seeking to further; however, given the complete abandonment of the legislative process the public record of HB 5471 is devoid of any evidence of what public purpose was being furthered. Quite simply this Court will be left to speculate on what that compelling purpose might be. Regardless, there is no rational basis, let alone reasoning which might withstand strict scrutiny, which justifies carving out large categories of citizens who are free to buy and possess without limitation based upon their employment status. How on earth can a citizens fundamental right to bear arms in furtherance of self-defense be categorized based upon where they work at a given moment in their life. For example, if a citizen is a jailer, he or she retains their rights, but at the moment he or she is no longer employed in that position, their rights expire. It's an absolute absurdity.

154. Creating an exempt status for those persons is not only irrational and completely lacking anything approaching common sense, there are no set of facts wherein it can survive a constitutional attack based upon equal protection regardless of the standard of review.<sup>12</sup>

155. Given the Defendants as laid out herein shoved this bill through the legislature in only two days, the Court will not find in the public record any information regarding the compelling public purpose for HB5471; however, what is certain is that regardless of the purpose of the law which the Defendants might self-servingly try and create, there is no way the purpose is furthered by exempting those persons enumerated within 720 ILCS 5/24-1.09(e) and 720 ILCS 5/24-1.10(e) from being subjected to the law.

156. Such actions by the Defendants are indisputably in violation of the Plaintiffs equal rights to be treated the same as their fellow citizens who are similarly situated in regard to their individual and fundamental constitutional rights to bear arms for self-defense.

WHEREFORE, Plaintiffs, herein request that this court enter an Order:

- A. Plaintiffs pray this Honorable Court declare 720 ILCS 5/24-1.09 *et seq.* and 720 ILCS 5/24-1.10 *et seq.* unconstitutional as violative of the Equal Protection Clause of Article I, Section 2 of the Illinois Constitution;
- B. That the Court grant such other and further relief as is just and proper.

**COUNT V**  
**REQUEST FOR AN INJUNCTION**  
**ENJOINING ENFORCEMENT OF**  
**720 ILCS 5/24-1.9 AND 720 ILCS 5/24-1.10**

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<sup>12</sup> Why understanding the reasoning of the Defendants in providing for such an exemption is wholly irrelevant, the Court should note the overwhelming connection of many of those exempt persons is their status as belonging to a particular public union. One can't help but consider their very powerful lobbies were responsible for successfully carving out their members from being subjected to this law. What legitimate purpose can be gleaned from allowing for example a county jailer to be able to purchase, transfer, etc. a .50 caliber rifle at will when the rest of the citizens of the state are prohibited. It defies common sense and reeks of political patronage, but all that really matters is that it violates equal protection.

157. Plaintiffs incorporate paragraphs 1 through 156 as if each had been specifically plead herein.
158. Plaintiffs have a right to insist their fundamental rights are not impaired by the Defendants due to their engaging in lawmaking which violates the Illinois Constitution.
159. There can be no doubt the Defendants are attempting to constrain the rights of Plaintiffs to keep and bear arms within the provisions of 720 ILCS 5/24-1.09 *et seq.* and 720 ILCS 5/24-1.10 *et seq.*
160. Effective immediately, if the Plaintiffs do not comply with specific provisions of 720 ILCS 5/24-1.9(b), 720 ILCS 5/24-1.10(b), they are subjected to criminal prosecution pursuant to 720 ILCS 5/24-1(15), 720 ILCS 5/24-1(16) and 720 ILCS 5/24-1.10(g).
161. Effective in 90 days, the Plaintiffs are limited to where they might possess their firearms or be subjecting themselves to criminal penalty. (See 720 ILCS 5/24-1.9(d)).
162. Quite simply, the Defendants are infringing upon the lawful right of the Plaintiffs to keep and bear arms.
163. The Plaintiffs have no adequate remedy at law in which to seek relief from the irreparable harm caused by the Defendants, for every day the Plaintiffs are subjected to these unconstitutional provisions, their freedoms and liberties regarding their rights to bear arms are being constrained and they are further being subjected to criminal prosecution.
164. The Plaintiffs have proven the Defendants have engaged in unconstitutional conduct for one or more of the four independent reasons, with any one of the four being sufficient on its own to warrant granting injunctive relief:
- a) Defendants have violated Ill. Const. 1970, art. IV, § 8(d) for failure to comply with the Single Subject Rule.



- b) Defendants have violated Ill. Const. 1970, art. IV, § 8(d) for failure to comply with the Three Readings Requirement.
- c) Defendants have violated Ill. Const. 1970, art. I, § 2 for failure to comply the Equal Protection Clause.
- d) Defendants have violated Ill. Const. 1970, art. I, § 2 for failure to comply the Due Process Clause.

WHEREFORE, PLAINTIFFS herein request that this court enter an Order:

- A. Finding the Plaintiffs have a right to expect Defendants pass legislation in compliance with the procedural and substantive provisions of the Illinois Constitution;
- 165. Finding the Defendants, under the facts presented herein, have violated one or more of the following as it relates to the passage of HB 5471, including the particular provisions of 720 ILCS 5/24-1.09 *et seq.* and 720 ILCS 5/24-1.10 *et seq.*:
  - i) Ill. Const. 1970, art. IV, § 8(d) for failure to comply with the Single Subject Rule.
  - ii) Ill. Const. 1970, art. IV, § 8(d) for failure to comply with the Three Readings Requirement.
  - iii) Ill. Const. 1970, art. I, § 2 for failure to comply the Due Process Clause.
  - iv) Ill. Const. 1970, art. I, § 2 for failure to comply the Equal Protection Clause.
- B. Enter an injunction permanently enjoining the Defendants, or anyone under their direction or control from enforcing 720 ILCS 5/24-1.09 *et seq.* and 720 ILCS 5/24-1.10 *et seq.* against Plaintiffs.
- C. For such other relief as this Court deems just and proper.

Respectfully submitted,

/s/ Thomas G. DeVore  
IL Bar No. 06305737  
Silver Lake Group, Ltd.  
118 N. 2nd St.  
Greenville, IL 62246  
Telephone - 618-664-9439  
[tom@silverlakelaw.com](mailto:tom@silverlakelaw.com)

/s/ Bryan Drew  
IL Bar No. 6271184  
Drew Law Group  
806 Public Square  
Benton, IL 62812  
Telephone – 618-439-9406  
[bdrew@drewlawgroup.com](mailto:bdrew@drewlawgroup.com)