

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

MOTION TO RECONSIDER

Now comes Plaintiffs, by and through their attorneys, Thomas DeVore, and the Silver Lake Group, Ltd., and in support of their Motion Reconsider, states as follows:

RELEVANT FACTUAL HISTORY

1. This matter has been pending since January 17, 2023.
2. On January 20, 2023, the Court entered a temporary restraining order against Defendants and in favor of the Plaintiffs.
3. Defendants appealed to the 5th Appellate District and on appeal the Court upheld the temporary restraining order finding the Defendants had likely violated the equal protection clause of the Illinois Constitution.
4. On or about March 10, 2023, the Plaintiffs filed their First Amended Complaint.
5. It was a three-count complaint.

6. On or about May 31, 2023, the Defendants Governor Pritzker and Kwame Raoul filed a 735 ILCS 5/2-615 motion to dismiss and memorandum in support. (See Exhibit A for the memorandum in support)
7. The motion to dismiss asked for this Court to dismiss Counts I and III as well as dismiss Governor Pritzker from the complaint in its totality.
8. The motion to dismiss by Governor Pritzker did not seek dismissal of Count II. (Emphasis Added)
9. The legislative defendants sought to join in the dismissal.
10. On or about May 04, 2023, this Court heard oral argument on, *inter alia*, the motion to dismiss.
11. This Court took the matter under advisement.
12. While the matter was under advisement, the Illinois Supreme Court issued a ruling in the Caulkins matter, being Case 2023 IL 129453. (See Exhibit B)
13. As a result of that ruling, this Court, knowingly or otherwise issued a sua sponte ruling, dismissing this case with prejudice and vacating the TRO.
14. At the time, this Court issued its ruling dismissing with prejudice the entire complaint and vacating the TRO, no motion was pending by any party seeking such relief.

LEGAL STANDARD

15. The purpose of a motion to reconsider is to bring to the trial court's attention (1) newly discovered evidence not available at the time of the hearing, (2) changes in the law, or (3) errors in the court's previous application of existing law. *Broadnax v.*

Morrow, 326 Ill.App.3d 1074, 1082, 261 Ill.Dec. 225, 762 N.E.2d 1152, 1158 (2002).

16. The decision to grant a motion to reconsider rests within the trial court's discretion, and we will not disturb the trial court's decision absent an abuse of such discretion. *Williams v. Dorsey*, 273 Ill.App.3d 893, 903, 210 Ill.Dec. 310, 652 N.E.2d 1286, 1293 (1995).
17. We must emphasize that a dismissal under section 2-615 of the Code occurs at the earliest stages of the litigation. A dismissal under section 2-615 of the Code should be made with prejudice “only where it is clearly apparent that the plaintiffs can prove no set of facts entitling recovery.” *Norabuena v. Medtronic, Inc.*, 2017 IL App (1st) 162928, ¶ 39, 416 Ill.Dec. 913, 86 N.E.3d 1198.
18. If a plaintiff can state a cause of action by amending his complaint, dismissal with prejudice should not be granted. *Buffa v. Haideri*, 362 Ill. App. 3d 532, 540, 298 Ill.Dec. 295, 839 N.E.2d 618 (2005).

THE SUPREME COURT ORDER IN CAULKINS

19. The Supreme Court held “the exemptions do not deny equal protection because plaintiffs have not sufficiently alleged that they are similarly situated to and treated differently than the exempt classes. (See ¶4 of Page 2, *Caulkins v. Pritzker*, 2023 IL 129453) ¹
20. The Supreme Court proclaimed the seven enumerated categories of individuals who are exempt from the purchase or possession restrictions based on their employment and training. (See ¶55 on Page 13, *Caulkins v. Pritzker*, 2023 IL 129453)

21. There are various places in the Caulkins ruling which this Court should refer.
22. However, as it relates to wardens, superintendents and keepers of prisons, the Illinois Supreme Court did not discuss what training requirements are required of these state employees as it relates to the banned weapons. (See ¶58 on Page 13, Caulkins v. Pritzker, 2023 IL 129453)
23. The Supreme Court again pointed to the exempt persons having specialized training. (See ¶62 on Page 15, Caulkins v. Pritzker, 2023 IL 129453)
24. The Supreme Court proclaimed the legislation was balancing public safety against the expertise of “trained professionals.” (See ¶62 on Page 15, Caulkins v. Pritzker, 2023 IL 129453)
25. By contrast, each of the seven categories of trained professionals must undergo specialized firearms training pertaining to their employment. (See ¶68 on Page 17, Caulkins v. Pritzker, 2023 IL 129453)
26. The training supports the presumption that they exercise greater responsibility in the safe handling and storage of firearms. (See ¶68 on Page 17, Caulkins v. Pritzker, 2023 IL 129453)

DEFENDANTS STATED POSITION IN REGARD TO TRAINING IN THIS CASE

27. The professions identified in the Act are professions that necessarily entail substantial firearms training, including on how to safely handle and store assault weapons. (Page 14 of the Governor and Attorney Generals Response to Plaintiff’s Request for a Temporary Restraining Order filed January 18, 2023) (See Exhibit C)

¹ It is clear the Supreme Court denied Caulkins relief for his failure to adequately allege and prove he was similarly situated. Simply speaking Caulkins did not meet his burden. This does not foreclose Plaintiffs in this case from being allowed to allege facts and have their opportunity to prove to this Court they are in fact similarly situated.

28. At the hearing in this Court on January 18, 2023, counsel for the Governor and Attorney General proclaimed in open court, “So the people in the professions that are exempted from these provisions of the legislation, they are in professions that anything else entails substantial firearm training. How to safely handle and store what the Legislature has defined as assault weapons.” (See Transcript of hearing on Temporary Restraining Order, Pages 44-45, Lines 23-24, 1-3)
29. In this case, just as in the Caulkins case, the Defendants have proclaimed, but never adduced any evidence in support, that the exempt classes are subjected to substantial firearms training with weapons the Legislature has defined as an “assault weapon.”

ARGUMENT

I. The Court erred by granting relief which was not plead for by Defendants.

30. Given that it had been several months from the time the Court heard argument on May 04, 2023 until it rendered its decision, the Plaintiffs believe the Court may have forgotten the posture of the pleadings.
31. In its docket entry on August 15, 2023, the Court proclaimed it was ruling on the motion to dismiss which had been argued on May 04, 2023.
32. That motion to dismiss did not seek dismissal of this case in its totality with prejudice or the vacating of the TRO.
33. Even if this Court were to grant all relief requested of all Defendants as plead, Count II of the Complaint still survives with the Attorney General as the Defendant.

34. Moreover, the temporary restraining order was never sought to be dissolved by the Defendants and should still be in place.
35. Nowhere does the Court proclaim it is acting sua sponte to dismiss Plaintiff's claims with prejudice or vacate the TRO.
36. This alone warrants reversal of the Courts dismissal order and reinstating the TRO.
- II. The Supreme Court ruling does not hold the Plaintiffs in this case cannot under any set of facts be successful and as such dismissal with prejudice is reversible error.**
37. Right out the gate, the Illinois Supreme Court held Caulkins had failed to show he was similarly situated to the exempt classes.²
38. This Court in its docket entry stated in regard to the Caulkins matter "the plaintiffs in that case are not similarly situated to the trained professionals to which the exceptions apply.
39. It appears this Court erroneously concluded the Illinois Supreme Court ruling held that no citizen of this state under any set of facts can prove a violation of equal protection.
40. That was not what the Illinois Supreme Court held and this Court's reasoning is flawed a couple of different ways as it relates to its interpretation and application of the Caulkins holding.

² The Illinois Supreme Court was correct in that regard as it relates to the Caulkins matter. Caulkins went to final judgment in the form of summary judgment with absolutely no facts to meet his burden of proving the Plaintiffs in that cause were similarly situated to any of the exempt classes. This case is not the same as it is still in the discovery phase and the Plaintiffs in this case have the right to produce facts to this Court to meet their burden. The Illinois Supreme Court ruling is clear in that regard.

41. Firstly, the Plaintiffs in the Caulkins case failed to show they were similarly situated to the exempt classes.
42. Failing to show they were similarly situated does not mean they weren't similarly situated, as it just means Caulkins failed to prove it. ³
43. Secondly, and most importantly, is the Illinois Supreme Court had no evidence in front of it but the arguments of counsel, even as it related to the training of the exempt classes.
44. Just as the Defendants have done in this case, the Defendants in Caulkins proclaimed with pure conjecture that the exempt classes have specialized training with these banned weapons.
45. Caulkins failed to push back on that conjecture with any set of facts to prove otherwise.
46. However, the Plaintiffs in this case are not foreclosed from being able to adduce evidence to this Court to prove they are in fact similarly situated.
47. Similarly situated can be proven one of two ways.
48. One is the exempt classes do not in fact receive specialized training with these banned weapons.
49. Secondly, the Plaintiffs can prove they are in fact as well trained as any or all of the exempt classes.

a) **Exempt classes have in fact NOT received any specialized training in the banned weapons and as such are similar to each and every other law abiding person.**

50. The Defendants in Caulkins successfully convinced the Illinois Supreme Court with only conjecture that the seven exempt classes were not similarly situated to the plaintiffs in that matter given their specialized training with these banned weapons.⁴
51. The same Defendants in this case have unashamedly proclaimed to this Court the same thing that these seven exempt classes have received specialized training in the use and storage of these banned weapons.
52. Ironically, the Defendants have never been called upon to prove those proclamations and any attempt by the Plaintiffs to utilize discovery in this case to prove it has been met with resistance.
53. However, while Caulkins was pending in front of the Illinois Supreme Court, a Plaintiff in this case sent a FOIA request to the Illinois Department of Corrections.
54. Attached as Exhibit D is an affidavit from Mr. Kirk Allen who is a Plaintiff in this case.
55. Mr. Allen has sworn under oath to the validity and completeness of certain documents he requested via the Illinois Freedom of Information Act.⁵

³ This fatal error is why Caulkins lost. He allowed the Defendants to rush him to final judgment with no facts. It is also the same reason why the Defendants in this case don't want to proceed to discovery because they know the Plaintiffs will expose the lack of substance to their training argument which was made up on a whim.

⁴ In the Caulkins case, there was zero evidence. No affidavits, no exhibits, no discovery. As such, it was pure conjecture that the exempt classes received specialized training in the use and storage of the banned weapons. Just as it has always been conjecture in this case until now as the Plaintiffs have evidence to prove it is false.

⁵ Given this Court's reluctance to allow Plaintiffs any ability to engage in discovery as of yet, the only way to obtain any information to present a case to this Court was via the FOIA laws. How can the Plaintiffs ever be expected to prove their

56. The Court will see Mr. Allen sought out and received the training records of all Prison Wardens in the State of Illinois.
57. The Prison Wardens are an exempt class and as such according to the Defendants averments to this Court, and to the Illinois Supreme Court in Caulkins, have undergone specialized training in the use and storage of the banned weapons.
58. The Court will clearly see this proclamation made by the Defendants in this case, which is the same proclamation made to our Illinois Supreme Court, is a complete falsity.
59. Each and every prison warden in this State of Illinois has had absolutely no training on any of the banned weapons. (See Exhibit E which is a summary schedule of the training records attached to the Mr. Allen's affidavit for the prison wardens.)
60. The only training had by these Prison Wardens is basis firearms training with a handgun.⁶
61. As it relates to any specialized training in the banned weapons, the exempt class of prison wardens has none.
62. For this reason, considering the record in this case as of the filing of this motion to reconsider, all Plaintiffs in this case are at a minimum in fact similarly situated with

case as to the training of the exempt classes, if they can't engage in discovery. While this is exactly what the Defendants are trying to accomplish, this Court must give the Plaintiffs some ability to adduce facts to allege and satisfy its burden.

⁶ It is worth noting to the Court that if it chooses to review several of the training records of these wardens, it will see many of them "slap the trigger". This evidences a lack of experience in the handling and shooting of a firearm. Ultimately, what is relevant inquiry for this Court is that they exempt persons received no training whatsoever on

the prison wardens as it relates to training on the banned weapons as the Plaintiffs and Prison Wardens similarly have none. ⁷

- 63. This is certainly enough evidence at this stage to warrant this Court reconsidering its dismissal with prejudice, and entering an order reversing the dismissal and reinstating the TRO, as this evidence is sufficient at this stage to show the Court that certain exempt classes have no training whatsoever with the banned weapons.
- 64. Given certain exempt classes have zero training on the banned weapons, all law abiding citizens are similarly situated to these exempt persons.

b. Certain Plaintiffs in fact have more training than the Prison Wardens.

- 65. Of the named Plaintiffs in this case, at least 570 of them are retired military. (See Exhibit F)
- 66. Of those retired from the military, at least 218 of them are special forces. (See Exhibit F)
- 67. Attached as Exhibit F is a specific group exhibit of affidavits for five of the Plaintiffs who are retired special forces military with active combat experience. (See Exhibit G)
- 68. Each of those named Plaintiffs has identified their weapons training. ⁸

⁷ There are in fact Plaintiffs in this case which exponentially more training than the prison wardens on the banned weapons but notwithstanding this argument, even without this Court knowing more about all Plaintiffs, it can assume each and every Plaintiff is similarly situated to the prison wardens given they have zero training on the banned weapons.

⁸ Ironically, the weapons for which these brave men and women have been trained are actual weapons of war. These are fully automatic assault weapons. These are not their lesser semi-automatic cousins which the general population owns. So while these former American heroes weren't trained on the civilian version, they were trained to be some of the most dangerous fighters in the world with real assault weapons.

69. All of the 570 professional soldiers named in Exhibit E, and especially, the special forces soldiers, comprise some of the most well-trained warriors that have ever walked this planet.
70. The training they received is second to none worldwide.
71. The Plaintiffs point out specifically Mr. Joseph S. Frederick, United States Navy Special Forces.
72. Mr. Frederick served nine tours of combat overseas and is trained as a special forces soldier on weapons which include the M16/M14 and .50 caliber rifles.
73. Yet somehow, this Court is supposed to believe that a group of political appointees as prison wardens, who have no documented training on the “banned weapons” are in any way more well-trained than these soldiers, especially special forces soldiers like Mr. Frederick.⁹
74. It defies any bounds of comprehension as to how anyone can take that proposition seriously.
75. Over 200 of these highly trained men and women who are Plaintiffs in this matter walked the streets of Afghanistan, Iraq, etc. placing their lives at risk for this country, yet according to this law and Defendants arguments they are not as well trained as these twenty-two political appointees who have no training whatsoever on even the less lethal citizen model AR-15 platform, and at best these twenty-two

⁹ Should the Court find it necessary to review the detailed training records of the prison wardens, it will see many of those administrative appointees were “slapping the trigger” when firing the handgun. Slapping the trigger is common with persons who lack any serious level of experience with firing and handling these firearms. While it is conjecture at

political appointees spent a few hours on a pistol range plinking around at a few targets.

76. There is no doubt these American heroes are not similarly situated as the exempt class of prison wardens, as that would be an insult to these soldiers of war, for these men and women will always be far superior from a training perspective with these weapons as compared to these political appointees.
77. Again, these facts certainly warrant this Court reversing its decision dismissing this case with prejudice and reinstating the TRO.

c. Certain Plaintiffs have at a minimum the same amount of generalized training with handguns

78. At all times in this Court and in front of our Illinois Supreme Court, the Defendants have beat the drum in regard to the specialized training with these banned weapons that these exempt classes have undertaken.
79. Until now, the Defendants have been able to get away with this ruse as they continued to refuse to tender any discovery in this cause while the Plaintiffs in the Caulkins matter foolishly rushed their way forward through the court system.
80. Through other means, the Plaintiffs have been at a minimum been able to adduce what type of training the exempt class of prison wardens has undergone.
81. Once again as to the banned weapons, they have no training whatsoever.

this point, as this case continues, these prison wardens will be deposed and the Court will be apprised if any of them even know how to handle or fire one of the banned weapons. At a minimum, the Court knows they have received no training.

82. What they do have is a basic course in firearm safety and shooting proficiency with only a handgun, which is not a banned weapon under this law.
83. This training is for all intents and purposes substantively similar to the training a citizen must undergo to obtain their conceal and carry license.
84. At a minimum 1873 of the Plaintiffs named in this matter have their conceal and carry permit.
85. Attached as Exhibit H is a group of ten affidavits of Plaintiffs in this cause who have completed training and obtained their conceal and carry license.
86. In order to obtain a conceal and carry permit in Illinois, a citizen must undergo classroom and shooting proficiency training.
87. It is true that training for conceal and carry holders does not include training on those weapons banned by this law; however, the training undertaken by the prison wardens also does not require any training on the banned weapons and as such these conceal and carry permit holders are similarly situated from a handgun training perspective to these prison wardens.
88. It really makes little sense to even be talking about handgun training such as this as it has nothing to do with any specialized training requirements of the banned weapons as this training undergone by the prison wardens and conceal and carry holders does not result in either being trained in the “assault weapons” being banned.

89. However, what it does evidence is that the prison wardens and the conceal and carry holders are from an overall perspective trained in a similar fashion in handguns which are not banned under this law.
90. To the extent training ever had anything to do with the basis for creating these exempt categories, this exempt class of prison wardens, and the conceal and carry holders have the same type of training not specific to the banned weaponry.¹⁰

CONCLUSION

91. It was reversible error for this Court to sua sponte dismiss this case in its totality with prejudice.
92. No motion was pending asking this Court to dismiss this case in such a fashion and there was not a motion pending to dissolve the temporary restraining order.
93. It is further reversible error for this Court to interpret the Caulkins ruling in such a way to have concluded that ruling is an absolute bar for any matter to proceed which alleges an equal protection violation.
94. Caulkins failed to adduce any facts to meet his burden of showing the plaintiffs in that cause were similarly situated.
95. Caulkins foolishly waived discovery and went to final ruling with nothing.

¹⁰ This Court must ask itself what discovery will uncover in this matter. What are the training requirements of the other exempt categories. Who has been trained on these banned weapons in all other exempt classes. Those records are available and will assuredly show similar problems for the Defendants which is why they are fighting so hard to not have to provide these details. The Defendants desire to continue to mislead the Court regarding this specialized training requirement of the exempt classes just like it did in previous filings and oral argument.

96. That is why that case failed but it does not foreclose the Plaintiffs here from proceeding.
97. At this stage, notwithstanding the stonewalling of the Defendants, the Plaintiffs have adduced enough facts to this Court evidencing they are in fact similarly situated to exempt persons under the law.
98. Those facts were missing in Caulkins and if that case had them, it may have turned out differently.
99. The Plaintiffs in this case have them now and for these reasons this Court must reconsider its dismissal and reverse its decision dismissing this case.
100. It must also reverse its decision dissolving the temporary restraining order.
101. Should the Defendants desire to seek dismissal or dissolution of the restraining order, they can file a pleading to do so.
102. While it is premature at this point, these facts provided in this motion to reconsider, should result in the future denial of any dismissal or dissolution request.

WHEREFORE, Plaintiffs, respectfully requests that this honorable Court grant is motion to reconsider thereby rescinding its dismissal with prejudice and its dissolution of the temporary restraining order.

Respectfully Submitted,

SILVER LAKE GROUP, Ltd.

By: /s/ Thomas DeVore

Thomas G. DeVore #06305737

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Greenville, IL 62246

CERTIFICATE OF SERVICE

PLEASE TAKE NOTICE that, the undersigned hereby certifies, that a true and correct copy of the foregoing was served upon the below named individuals by such method as is indicated above the individual's name and that the same was electronically filed with the Clerk of the Circuit Court wherein this cause is now pending on the date below written.

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Dated: September 14, 2023

By: /s/ Thomas G. DeVore

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IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CHANCERY DIVISION

MIGUEL DIAZ, et al.,

v.

THE CITY OF CHICAGO, an Illinois
Municipal Corporation, *et al.*

Plaintiffs,

Defendants.

Case No. 2022-CH-11936

DEFENDANTS’ MEMORANDUM OF LAW
IN SUPPORT OF THEIR MOTION TO DISMISS PLAINTIFFS’
SECOND AMENDED COMPLAINT PURSUANT TO 735 ILCS 5/2-619-1

Defendants, the City of Chicago, Dr. Allison Arwady, in her official capacity as Commissioner of the Chicago Department of Public Health, and Brandon Johnson, in his official capacity as Mayor of the City of Chicago, respectfully ask the Court to dismiss Plaintiffs’ Second Amended Complaint with prejudice. Plaintiffs are employees of the City of Chicago who bring a one-count second amended complaint seeking to declare the City’s policy requiring all City employees to be vaccinated against COVID-19 absent an approved medical or religious accommodation is void because the Policy states that it was adopted by the City and not a specific “agent” of the City. There is no legal support for Plaintiffs’ contention that the Vaccination Policy is void, as the City unquestionably has the power to adopt policies for its employees. Plaintiffs’ claim should therefore be dismissed under 735 ILCS 5/2-615. Plaintiffs’ claim against Mayor Johnson and Dr. Arwady in their official capacities should also be dismissed under 735 ILCS 5/2-615 as redundant. Further, all but two of the Plaintiffs are employed under collective bargaining agreements that include mandatory arbitration provisions. An arbitrator has already held that the Vaccination Policy was a valid exercise of the City’s power under its collective bargaining agreements. The union Plaintiffs lack standing to bring these claims or challenge the arbitrator’s awards, and their claims should be dismissed under 735 ILCS 5/2-619.

I. Background

A. Plaintiffs

In their First Amended Complaint, Plaintiffs alleged that the individuals named as Plaintiffs are employees of the City. 1st Amd. Cmp. ¶ 6. Because the Complaint only identified the Plaintiffs by first and last name, the City was not able to definitively identify Plaintiffs. The City's employee records include approximately 244 current employees with names matching those of the original Plaintiffs. Ex. 1, Affidavit of Alix Meza, ¶ 3. Of those, 181 were police officers represented for collective bargaining purposes by the Fraternal Order of Police Lodge 7. *Id.*, ¶ 4. Nineteen were police sergeants or lieutenants represented by the Policemen's Benevolent & Protective Association. *Id.*, ¶ 5. Thirty-five were fire fighters or EMTs represented by Chicago Fire Fighters Union Local 2. *Id.*, ¶ 6. Seven were civilian employees represented by various other unions. *Id.*, ¶ 7. Only two, Jose Alberto Lara and Luis Rivera, Jr., were not represented by a union. *Id.*, ¶ 8. Jose Alberto Lara has already certified that he is vaccinated in compliance with the City's Vaccination Policy. *Id.*, ¶ 9. The plaintiffs named in the Second Amended Complaint are a subset of approximately 165 of the individuals named in the original Complaint. The Second Amended Complaint does not appear to include any new plaintiffs who were not named as plaintiffs in the original Complaint.

The terms and conditions of employment for the Plaintiffs who are represented by unions are set forth in collective bargaining agreements between the City and the respective unions. Ex. 2, Affidavit of Cicely Porter Adams, ¶ 4. Each collective bargaining agreement includes provisions for adjustment of grievances and final and binding arbitration of unresolved grievances. *Id.*, ¶¶ 4-8. Each collective bargaining agreement was ratified and adopted as a City ordinance by the Chicago City Council. *Id.*, ¶ 4.

B. The City of Chicago's Vaccination Policy

The City began meeting with representatives for the various unions representing City employees to bargain over the effects of the Vaccination Policy in August 2021. Ex. 2, ¶ 9. City representatives met with the Fraternal Order of Police ("FOP") and Policemen's Benevolent and Protective Association ("PBPA") on August 24, September 27, October 1 and October 7. *Id.* City representatives also met with a coalition representing AFL-CIO bargaining units including the Coalition of Unionized Public Employees ("COUPE"), the American Federation of State, County and Municipal Employees ("AFSCME"), the Illinois Nurses Association ("INA"), and Local 2 of the International Association of Fire Fighters, AFL-CIO-CLC to bargain over the effects of the vaccination policy on August 13, August 25, September 3, and September 20, 2022. *Id.* The City also met separately with Local 2 representatives on October 13, 2022. *Id.*

On October 8, 2021, the City sent notice of the Vaccination Policy to all employees and published the Vaccination Policy on its website. *Id.*, ¶ 10, 2nd Amd. Cmp., ¶ 7. The FOP, PBPA, Local 2, and various civilian unions all filed grievances alleging that the Vaccination Policy violated their respective collective bargaining agreements. Ex. 2, ¶ 11. All of the grievances were submitted to arbitration before arbitrator George T. Roumell in three proceedings: one for the Local 2 grievances, one for the FOP and PBPA grievances, and the last for the civilian union grievances. *Id.*, ¶ 12. Arbitrator Roumell issued his awards in the Local 2 and civilian cases on December 15, 2021. *Id.*, ¶ 13; Ex 7, Ex. 8. The award for the FOP and PBPA case was issued on February 23, 2022. Ex. 2, ¶ 13; Ex. 9.

In each award, Arbitrator Roumell held that the Vaccination Policy was a valid exercise of the City's management rights under the various collective bargaining agreements and that the City did not have an obligation to bargain with the unions before implementing the policy. *See* Ex. 7, 8, and 9. Due to the dates on which each award was issued, Arbitrator Roumell extended the deadlines

for employees to be fully vaccinated to December 31, 2021 for fire fighters, January 31, 2022 for civilians, and April 13, 2022 for police. The City has complied with Arbitrator Roumell's awards with respect to its application of the Vaccination Policy. *See* Ex. 2, ¶ 14. Although the unions sought to challenge each of Arbitrator Roumell's awards in court, none of the awards have been vacated. *Id.*, ¶ 15.

II. The Complaint Should Be Dismissed Under 735 ILCS 5/2-615 Because Plaintiffs Fail to State a Claim Upon Which Relief Can Be Granted

A motion to dismiss under Section 2-615 attacks the sufficiency of the complaint. 735 ILCS 5/2-615. Illinois is a fact-pleading jurisdiction; "plaintiffs must allege facts, not mere conclusions, to establish their claim as a viable cause of action." *Iseberg v. Gross*, 227 Ill.2d 78, 86 (2007). Accordingly, conclusions of law, unsupported by specific factual allegations must not be considered, and merely paraphrasing the elements of a cause of action is not sufficient. *Knox Coll. v. Celotex Corp.*, 88 Ill.2d 407, 424 (1981). If, after disregarding all conclusions in a complaint, there are insufficient allegations of fact to state a claim, the complaint must be dismissed. *Id.* at 423.

A. Plaintiffs' Amended Complaint Fails to State a Claim Under Illinois Law

Plaintiffs' claim that the City's Vaccination Policy is invalid because the City "is an artificial creature of legislative fiat and as such cannot act on its own" is entirely without basis. Under the Illinois Municipal Code, a municipality has inherent authority to manage its workforce and set rules and criteria for employment eligibility. 65 ILCS 5/10-4-1; *Redemske v. Village of Romeoville*, 85 Ill.App.3d 286, 290 (3d. Dist. 1980) ("Implied in the Section 10-4-1 grant of general powers respecting employment, is power to the municipalities to regulate the conduct of their employees, for their own benefit, and for the benefit of the effective administration of the municipalities business," and "the power to set working hours, pay schedules, working

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conditions or other conditions or restrictions on employment”). In addition, Section 11-20-5 of the Illinois Municipal Code permits every municipality to do all acts and make all regulations which may be necessary or expedient for the promotion of health or the suppression of diseases. 65 ILCS 5/11-20-5; *see also Schuringa v. City of Chicago*, 30 Ill.2d 504 (1964); *Greyhound Lines, Inc. v. City of Chicago*, 24 Ill. App. 3d 718, 722 (1974); *Father Basil's Lodge v. City of Chicago*, 393 Ill. 246, 254-55 (1946) (“the most important of the police powers of a city is that of caring for the safety and health of the community”); *Hagler v. Larner*, 284 Ill. 547, 552-53 (1918). Accordingly, the City is authorized to do all acts which may be necessary for the promotion and protection of public health and suppression of diseases, including requiring its employees to get vaccinated. Courts should not interfere with a municipality's exercise of its police power unless there is a palpably arbitrary or unfair exercise of the power. *Schuringa*, 30 Ill.2d at 509; *Jacobson*, 197 U.S. at 26-29.

The City's Municipal Code also vests the Mayor with broad authority to “supervise the conduct of all the officers of the city.” Chicago Mun. Code 2-4-020. Ex. 10. The Mayor's “administrative officer, subject to the direction and control of the mayor, shall supervise the administrative management of all city departments, boards, commissioners and other city agencies established by this code and the laws of the state.” *Id.* The Municipal Code authorizes the Mayor to enact policies through an “administrative officer, subject to the direction and control of the mayor, . . . [to] supervise the administrative management of all city departments, boards, commissioners, and other city agencies,” and to “supervise the conduct of all of the officers of the city.” *Id.* By their plain language, these provisions granted former Mayor Lightfoot and her subordinates broad policymaking discretion over City employees. *See Troogstad v. City of Chicago*, 21 C 5600, 2021 WL 5505542, at *8 (N.D. Ill. Nov. 24, 2021).

Nevertheless, in the sole count of the Second Amended Complaint, Plaintiffs assert that the “[Vaccination Policy] is a nullity and has never had any force and effect of any kind” because the City of Chicago cannot act on its own. 2nd Amd. Cmp., ¶¶ 25-27. Plaintiffs reason that the policy states that it was adopted by “the City of Chicago” (*Id.*, ¶ 22); that the City is a municipal corporation that can only act via its agents (*Id.*, ¶¶ 23-25), and that the policy is therefore a nullity because it says that it was adopted by the City, but not by an agent of the City (*Id.*, ¶ 27). This argument is nonsensical. No one is under the illusion that the Vaccination Policy sprang into existence *sua sponte*, without the approval and action of the Mayor and other City officials. Plaintiffs effectively admit as much, alleging that “Lightfoot, and her subordinates, demanded, *inter alia*, that Plaintiffs comply with the [Vaccination Policy].” *Id.* ¶ 21. Mayor Lightfoot and her subordinates were agents of the City with authority to establish policy for City employees, as set forth above. That is exactly what they did in adopting and requiring Plaintiffs to comply with the Vaccination Policy.

Further confirming then-Mayor Lightfoot’s authority, on October 29, 2021, the City Council effectively ratified the Vaccination Policy by voting down an ordinance that would have nullified the Policy and required City Council approval for any future policies, rules, and regulations governing City employees. Ex. 11; *Troogstad*, 2021 WL 5505542 at *8 (noting that the City Council’s vote removed one of the core bases for the plaintiffs’ argument that the Mayor exceeded her authority in adopting the Vaccination Policy).

To the extent that Plaintiffs are asserting that the Vaccination Policy is invalid because it does not bear the name or signature of the Mayor or some other particular official, Plaintiffs reference no legal authority establishing such a requirement. *Downtown Disposal Services, Inc. v. City of Chicago*, 2012 IL 112040, cited in the Complaint, does not support Plaintiffs’ claim. In that case,

the Illinois Supreme Court rejected an argument that a complaint for administrative review filed on behalf of a private corporation and signed by the corporation's president was a "nullity" because the president was not an attorney. *Id.* ¶ 1. The Supreme Court held that although only an attorney could represent a corporation in court, the failure of an attorney to sign the administrative review complaint did not render the filing a "nullity" or warrant dismissal of the complaint. *Id.* ¶ 36. *Downtown Disposal* has nothing to do with this case. Therefore, Plaintiffs' First Amended Complaint must be dismissed.

In their Second Amended Complaint, Plaintiffs argue that it is "legally insignificant to the declaration being sought whether or not the city council, the mayor, or the health department director, may have had the lawful authority to create such an employment policy for as a matter of law none of them any any [sic] recognizable procedurally appropriate manner even attempted to do so." However, Plaintiffs do not appear to dispute that the Vaccination Policy was adopted by public officials with legal authority to do so, and nowhere do they identify any purported procedures that the City was obligated but failed to follow in doing so. Their conclusory assertion that the policy was not properly adopted is not sufficient to state a claim under Illinois law.

B. The Claim Against Mayor Johnson In His Official Capacity Should Be Dismissed as Redundant

In addition to the City, Plaintiffs name Dr. Allison Arwady and Mayor Brandon Johnson as defendants in their Second Amended Complaint. However, a claim against a city official in his or her official capacity is the same as a claim against the city. *See Dempsey v. Johnson*, 2016 IL App (1st) 153377, ¶ 12. As such, the official capacity claims against the Mayor and Dr. Arwady are redundant and should be dismissed. *See, e.g., Redwood v. Lierman*, 331 Ill. App. 3d 1073, 1088 (4th Dist. 2002) (affirming dismissal of "official capacity" claim against a mayor because it was duplicative of plaintiff's claim against a municipality).

III. All Union Plaintiffs' Claims Should Be Dismissed Under 735 ILCS 5/2-619 Because Their Claims Are Subject to Arbitration And Most Have Already Been Arbitrated

Under 735 ILCS 5/2-619, a “motion to dismiss affords a defendant a means of obtaining summary disposition when the plaintiff’s claim can be defeated as a matter of law or on the basis of easily proved issues of fact.” *Zurich Ins. v. Amcast Indus. Corp.*, 318 Ill. App. 3d 330, 333 (1st Dist. 2000). A Section 2-619 motion to dismiss assumes the veracity of all well-pleaded facts in the complaint. *Id.* A complaint must be dismissed when the plaintiff’s claim “is barred by other affirmative matter avoiding the legal effect of or defeating the claim.” 735 ILCS 5/2-619(a)(9). “An ‘affirmative matter’ is something in the nature of a defense which completely negates the cause of action or refutes crucial conclusions of law or conclusions of material fact unsupported by allegations of specific fact contained in or inferred from the complaint.” *Econ. Mech. Indus., Inc. v. T.J. Higgins Co.*, 294 Ill. App. 3d 150, 153 (1st Dist. 1997). Under 735 ILCS 5/2-619(a)(1), a cause of action should be dismissed if not commenced within the time limited by law, or if the Court lacks jurisdiction over the subject matter.

Plaintiffs assert in their Second Amended Complaint that the declaration they seek is “independent of any legal issues regarding union bargaining, management rights, etc., which issues must be addressed as matters of labor, as only the Courts can conclude the lawfulness of the procedures utilized by a municipality to create policy.” 2nd Amd. Comp. ¶ 29. Simply saying it does not make it so, and Plaintiffs’ conclusory allegation is contrary to Illinois law.

All but two of the Plaintiffs are bargaining unit employees whose employment is covered by one of several collective bargaining agreements between their respective unions and the City. Each of those collective bargaining agreements provides for resolution of disputes through mandatory arbitration. Ex. 2, ¶ 4. The CBAs are in turn ordinances adopted by the City Council. Ex. 2, ¶ 4. “It is well established in this State that an employee subject to a collective bargaining agreement

must at least attempt to exhaust contractual remedies before resorting to a judicial remedy. To state a complaint, a plaintiff must allege on the face of her pleadings that grievance procedures were followed and exhausted.” *Cessna v. City of Danville*, 296 Ill. App. 3d 156, 165 (4th Dist. 1998), citing *Quist v. Bd. of Trustees of Community College Dist. No. 525*, 258 Ill. App. 3d 814, 818 (3rd Dist. 1994).

Here, unions representing the vast majority of Plaintiffs challenged the Vaccination Policy through the grievance procedure under their respective collective bargaining agreements. Those grievances were advanced to arbitration before Arbitrator Roumell, who found that the City’s Vaccination Policy was a valid exercise of the City’s management rights under each CBA. Ex. 7, 8, 9. Under the CBAs, these awards are final and binding upon the Plaintiffs. In the absence of any allegation that their unions breached their duty of fair representation, Plaintiffs lack standing to challenge the awards in circuit court. *See Stahulak v. City of Chicago*, 184 Ill. 2d 176, 184 (1998) (holding that the only parties to a collective bargaining agreement are the union and the employer and individual employees lack standing to seek judicial review of arbitration awards). *See also Knox v. Chicago Transit Authority*, 2018 IL App (1st) 162265, ¶24 (2018); *Herbst v. City of Chicago*, 2021 Ill. App. (1st) 200725 (2021), ¶20; *Mahoney v. City of Chicago*, 293 Ill. App. 3d 69, 72-3 (1st Dist. 1997).

Individual union members can pursue judicial review of an arbitration award only if they can prove that their union breached its duty of fair representation in processing the underlying grievance. *Id.* at 184. Under the Illinois Public Labor Relations Act (“IPLRA”), the Illinois Labor Relations Board has exclusive jurisdiction over claims of violations of a union’s duty of fair representation. *See Knox v. Chicago Transit Authority*, 2018 IL App. (1st) 162265, at ¶35; *Cessna v. City of Danville*, 296 Ill. App. 3d 156, 163 (4th Dist. 1998); *Foley v. Am. Fed’n of State, Cty.,*

& Mun. Employees, Council 31, Local No. 2258, 119 Ill. App. 3d 6, 10 (1st Dist. 1990).

Accordingly, even if Plaintiffs had alleged that their unions breached their duty of fair representation, this Court would lack subject matter jurisdiction to hear the claims of all but two of the Plaintiffs.

Therefore, the Second Amended Complaint must be dismissed as to the Plaintiffs who are bargaining unit employees, as the matter before the Court already been resolved through binding arbitration.

IV. Conclusion

Based on the foregoing, Defendants, the City of Chicago, Dr. Allison Arwady in her official capacity as Commissioner of the Chicago Department of Public Health, and Brandon Johnson in his official capacity as Mayor of the City of Chicago, respectfully request that the Court dismiss Plaintiffs' Second Amended Complaint. Because this is now Plaintiffs' third attempt to state a valid claim against Defendants, this case should be dismissed with prejudice.

Dated: August 4, 2023

Respectfully submitted,

THE CITY OF CHICAGO, DR. ALLISON ARWADY, in her official capacity as Commissioner of the Chicago Department of Public Health, and BRANDON JOHNSON, in his official capacity as Mayor of the City of Chicago, Defendants.

By: /s/ William R. Pokorny
One of their Attorneys

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on August 4, 2023, he caused a true and accurate copy of the foregoing **DEFENDANTS' MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION TO DISMISS PLAINTIFFS' SECOND AMENDED COMPLAINT PURSUANT TO 735 ILCS 5/2-619-1** to be e-filed through Odyssey eFileIL which will e-serve all parties of record, namely:

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2023 IL 129453

**IN THE
SUPREME COURT
OF
THE STATE OF ILLINOIS**

(Docket No. 129453)

DAN CAULKINS *et al.*, Appellees, v. JAY ROBERT PRITZKER, in His Official Capacity
as Governor of the State of Illinois, *et al.*, Appellants.

Opinion filed August 11, 2023.

JUSTICE ROCHFORD delivered the judgment of the court, with opinion.

Chief Justice Theis and Justices Neville and Cunningham concurred in the
judgment and opinion.

Justice Holder White dissented, with opinion, joined by Justice Overstreet.

Justice O’Brien dissented, with opinion.

OPINION

¶ 1 The Protect Illinois Communities Act (Act) restricts firearms and related items
that the Act defines as “an assault weapon, assault weapon attachment, .50 caliber

rifle, or .50 caliber cartridge” (collectively, assault weapons) (720 ILCS 5/24-1.9(b) (West 2022)) and “large capacity ammunition feeding device[s],” commonly known as large capacity magazines (LCMs) (*id.* § 24-1.10(b)). Certain restrictions do not apply to (1) law enforcement agencies and individuals who complete firearms training as part of their employment in law enforcement, corrections, the military, and private security (trained professionals) (*id.* §§ 24-1.9(e), 24-1.10(e)) and (2) individuals who possessed assault weapons or LCMs before the restrictions became effective (grandfathered individuals) (*id.* §§ 24-1.9(d), 24-1.10(d)).

¶ 2 The circuit court of Macon County entered declaratory judgment for plaintiffs on two claims that the restrictions are facially unconstitutional because the exemptions deny the “law-abiding public” equal protection (Ill. Const. 1970, art. I, § 2) and constitute special legislation (*id.* art. IV, § 13) under the Illinois Constitution. Defendants appeal directly to this court. Ill. S. Ct. R. 302(a)(1) (eff. Oct. 4, 2011).

¶ 3 Plaintiffs defend the judgment on equal protection and special legislation grounds and allege for the first time that, regardless of the exemptions, the restrictions violate the second amendment to the United States Constitution. U.S. Const., amend. II. They further argue that Public Act 102-1116 (eff. Jan. 10, 2023), which added sections 24-1.9 and 24-1.10 to the Criminal Code of 2012 (720 ILCS 5/1-1 *et seq.* (West 2022)), violates the three-readings requirement of the Illinois Constitution and that the circuit court erred in ruling to the contrary. Ill. Const. 1970, art. IV, § 8(d).

¶ 4 First, we hold that the exemptions neither deny equal protection nor constitute special legislation because plaintiffs have not sufficiently alleged that they are similarly situated to and treated differently from the exempt classes. Second, plaintiffs expressly waived in the circuit court any independent claim that the restrictions impermissibly infringe the second amendment. Third, plaintiffs’ failure to cross-appeal is a jurisdictional bar to renewing their three-readings claim. Accordingly, we reverse the circuit court and enter judgment for defendants on the equal protection and special legislation claims. We express no opinion on the potential viability of plaintiffs’ waived claim concerning the second amendment.

¶ 5

I. BACKGROUND

¶ 6

A. The Act

¶ 7

The Act amended the Criminal Code of 2012 to restrict access to assault weapons and LCMs. Pub. Act 102-1116, § 25 (eff. Jan. 10, 2023) (adding 720 ILCS 5/24-1.9, 24-1.10). The Act, effective January 10, 2023, prohibits the purchase and sale, manufacture, delivery, and import of firearms defined by the statute as “assault weapons,” except sales to persons in other States or to those authorized to acquire them under the Act’s enumerated exemptions for certain professionals. 720 ILCS 5/24-1.9(b) (West 2022). The Act also prohibits possession of assault weapons beginning on January 1, 2024.

¶ 8

However, the Act contains two exemptions relevant here. A “grandfather” provision permits persons who lawfully possessed assault weapons before January 10, 2023, to continue to possess them as long as they provide an endorsement affidavit to the Illinois State Police by January 1, 2024. *Id.* § 24-1.9(c), (d). Those who inherit a lawfully owned assault weapon may retain it upon providing an endorsement affidavit. *Id.* § 24-1.9(d)(2)(ii). An endorsement affidavit, which is executed electronically as a form through a Firearm Owner’s Identification (FOID) card account (430 ILCS 65/4.1 (West 2022)), identifies the weapon and affirms that the individual owned it before January 10, 2023. 720 ILCS 5/24-1.9(d) (West 2022).

¶ 9

The Act also restricts the manufacture, delivery, sale, and purchase of LCMs, except the restriction on possession took effect on April 10, 2023, and the Act does not require endorsement affidavits for LCMs. *Id.* § 24-1.10(b)-(d).

¶ 10

In addition to the “grandfather” provision, the Act exempts seven enumerated classes from the restrictions on possession and purchase. Four of the exemptions apply to law enforcement agencies, peace officers, corrections officials, and active and retired law enforcement officers qualified under the federal Law Enforcement Officers Safety Act of 2004 (18 U.S.C. §§ 926B, 926C (2018)), as recognized under Illinois law. Those included in this law-enforcement exemption are required by law to receive firearms training and qualifications. 720 ILCS 5/24-1.9(e)(1)-(4), 24-1.10(e)(1)-(4) (West 2020).

¶ 11 Three other exemptions apply to members of the armed services, the reserve forces, and the Illinois National Guard; licensed private security guards; and guards at nuclear facilities, all of whom also receive firearms training by virtue of their employment. The Act permits them to possess assault weapons and LCMs, but only to the extent required by their official duties. *Id.* §§ 24-1.9(e)(5)-(7), 24-1.10(e)(5)-(7).

¶ 12 B. The Complaint

¶ 13 Plaintiffs are a business, two separately named individuals, and a voluntary unincorporated association, consisting of hundreds of individuals and businesses. All plaintiffs allege they “possess or otherwise desire to deliver, sell, import, or purchase” assault weapons as defined by section 24-1.9(a) “and/or manufacture, deliver, sell, or purchase” LCMs as defined by section 24-1.10(a).

¶ 14 Plaintiff Decatur Jewelry is a licensed pawn broker engaged in intrastate and interstate commerce involving “the sale, possession, and transfer of firearms.” Decatur Jewelry, which as a pawn broker holds certain assault weapons as security, alleges sections 24-1.9 and 24-1.10 criminalize the return of those weapons to their rightful owners.

¶ 15 Dan Caulkins and Perry Lewin are residents and citizens of Illinois who also “possess or otherwise desire to deliver, sell, import, or purchase” assault weapons “and/or manufacture, deliver, sell or purchase” LCMs.

¶ 16 Law-Abiding Gun Owners of Macon County is an association of “similarly interested members associated for the purpose of protecting the Second Amendment and Property rights of law-abiding gun owners.” Members must possess a valid FOID card.

¶ 17 The complaint alleged six counts seeking declaratory and injunctive relief, and the parties filed opposing motions for summary judgment. Plaintiffs moved for summary judgment only on counts IV and V, which alleged violations of the Illinois Constitution’s equal protection and special legislation clauses.

¶ 18 Count IV, the equal protection claim, alleged the trained professionals are “seemingly a protected class based upon their occupations” and “are wholly exempt

based on their employment status.” The claim alleged that “[c]reating 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.” Count IV alleged, “At issue is the infringement of a right to bear arms as guaranteed by the Illinois Constitution” such that the restrictions “are indisputably in violation of the Plaintiffs [*sic*] 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.” Count IV sought a judgment declaring sections 24-1.9(a) and 24-1.10(a) unconstitutional under the equal protection clause.

¶ 19 Count V, the special legislation claim, alleged “the 2nd Amendment protects the additional right to commercial and non-commercial sale of arms,” while sections 24-1.9 and 24-1.10 “create an economic franchise for those excepted from its criminal provisions to engage commerce, commercial and non-commercial, in gun sales on a broader basis not available to all who own ‘assault weapons’ or desire to purchase, gift, receive or sell ‘assault weapons.’ ” Count V sought a judgment declaring sections 24-1.9 and 24-1.10 unconstitutional for creating special classifications according to the excepted class, which enjoys “an economic franchise” in violation of the special legislation clause.

¶ 20 To the extent the complaint made isolated references to the right to keep and bear arms under either the second amendment or article I, section 22, of the Illinois Constitution, it was to claim that plaintiffs, as members of the law-abiding public with valid FOID cards, are similarly situated to the exempt classes for equal protection and special legislation purposes. Neither count IV nor count V alleged the restrictions violate the second amendment.

¶ 21 C. The Judgment

¶ 22 The circuit court determined that *Accuracy Firearms, LLC v. Pritzker*, 2023 IL App (5th) 230035, ¶ 65, which had upheld a temporary restraining order on an equal protection challenge to sections 24-1.9 and 24-1.10, entitled plaintiffs to summary judgment on their equal protection and special legislation claims. The circuit court ruled that the rights to bear arms under the state and federal constitutions are

fundamental rights; therefore, the challenged legislation was subject to strict scrutiny, which the legislation did not satisfy.

¶ 23 The circuit court did not consider whether plaintiffs were similarly situated to, but treated differently from, the exempt classes. Instead, the circuit court ruled the restrictions (1) denied plaintiffs equal protection by infringing on their gun rights (count IV) and (2) constituted special legislation by conferring an arbitrary right upon those eligible for the exception while excluding plaintiffs (count V). The court entered judgment for defendants on the remaining counts, including plaintiffs' claim that the Act violates the three readings clause of the Illinois Constitution. Ill. Const. 1970, art. IV, § 8(d).

¶ 24 Defendants filed a notice of direct appeal under Illinois Supreme Court Rule 302(a)(1) (eff. Oct. 4, 2011). We granted the state's attorneys of 33 counties leave to submit a brief *amici curiae* in support of plaintiffs, pursuant to Illinois Supreme Court Rule 345 (eff. Sept. 20, 2010).

¶ 25 II. ANALYSIS

¶ 26 A. Standard of Review

¶ 27 This appeal arises from plaintiffs' summary judgment motion for declaratory relief on the equal protection and special legislation claims. 735 ILCS 5/2-701(a) (West 2022).

“[S]ummary judgment should be granted only where the pleadings, depositions, admissions and affidavits on file, when viewed in the light most favorable to the nonmoving party, show that there is no genuine issue as to any material fact and that the moving party is clearly entitled to judgment as a matter of law.” *Pielet v. Pielet*, 2012 IL 112064, ¶ 29.

See 735 ILCS 5/2-1005 (West 2022). We review a summary judgment *de novo*. *Pielet*, 2012 IL 112064, ¶ 30.

¶ 28 We also review a constitutional challenge to a statute *de novo* because it presents a question of law. *People v. Masterson*, 2011 IL 110072, ¶ 23. Legislative enactments have a strong presumption of constitutionality, and this court must

uphold the constitutionality of a statute when reasonably possible. *Id.* Plaintiffs, who are on the side challenging the constitutionality of sections 24-1.9 and 24-1.10 of the Act, bear the burden to prove the statutes’ invalidity. *Id.*

¶ 29 Plaintiffs mount a facial challenge, which is the most difficult type of constitutional challenge. An enactment is invalid on its face only if no set of circumstances exists under which it would be valid. *People v. One 1998 GMC*, 2011 IL 110236, ¶ 20. A facial challenge requires a showing that the statute is unconstitutional under any set of facts; the specific facts related to the challenging party are irrelevant. *People v. Garvin*, 219 Ill. 2d 104, 117 (2006).

¶ 30 B. The Second Amendment

¶ 31 As a preliminary matter, we address plaintiffs’ argument that, regardless of how the exemptions implicate equal protection and special legislation, the restrictions themselves violate the right to keep and bear arms under the second amendment to the United States Constitution (U.S. Const., amend. II). Notably, plaintiffs do *not* assert the restrictions violate the corresponding right to arms set forth in article I, section 22, of the Illinois Constitution (Ill. Const. 1970, art. I, § 22). Plaintiffs’ references to the Illinois right to arms are isolated and made only in opposition to subjecting the classifications to rational-basis scrutiny in the equal protection context. Plaintiffs contend in their brief that the second amendment—not article I, section 22—provides an independent basis for affirming the judgment.

¶ 32 Plaintiffs frame the second amendment as a threshold issue, asserting that, if the right to keep and bear arms does not tolerate the restrictions, the court need not decide whether the exemptions deny equal protection or constitute special legislation. Citing the principle that a reviewing court may sustain the decision of the circuit court on any grounds called for by the record (*Landmarks Preservation Council of Illinois v. City of Chicago*, 125 Ill. 2d 164, 174 (1988)), plaintiffs ask this court to affirm the summary judgment because defendants did not demonstrate that the restrictions are consistent with the historical tradition of firearm regulation.

¶ 33 The second amendment states, “A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.” U.S. Const., amend. II. “At its core, the second amendment protects the

right of law-abiding citizens to keep and bear arms for self-defense in the home.” *Guns Save Life, Inc. v. Ali*, 2021 IL 126014, ¶ 28 (citing *District of Columbia v. Heller*, 554 U.S. 570, 635 (2008)). The United States Supreme Court has stated, “it is clear that the Framers and ratifiers of the Fourteenth Amendment counted the right to keep and bear arms among those fundamental rights necessary to our system of ordered liberty.” *McDonald v. City of Chicago*, 561 U.S. 742, 778 (2010); *Johnson v. Department of State Police*, 2020 IL 124213, ¶ 37.

¶ 34 Unlike equal protection, the second amendment does not concern the end that the government seeks to achieve and whether the means of doing so is an appropriate fit. See *N.Y. State Rifle & Pistol Ass’n v. Bruen*, 507 U.S. ___, ___, 142 S. Ct. 2111, 2127 (2022). Instead, second amendment claims involve a fact-intensive inquiry asking (1) whether a plaintiff has shown that the regulated items fall in the category of “bearable arms” (*id.* at ___, 142 S. Ct. at 2132) that are “commonly used” for self-defense today (*id.* at ___, 142 S. Ct. at 2138) and, if so, (2) whether the restrictions are consistent with “this Nation’s historical tradition of firearm regulation” (*id.* at ___, 142 S. Ct. at 2126).

¶ 35 For two reasons, these issues were never raised or considered below. First, plaintiffs omitted a second amendment claim from the complaint and expressly disclaimed it in their pleadings. Second, equal protection and second amendment challenges are analyzed under different standards.

¶ 36 A summary judgment motion is confined to the issues raised in the complaint, and a plaintiff may not raise new issues not pleaded in his complaint to support or defeat a motion for summary judgment. *800 South Wells Commercial LLC v. Cadden*, 2018 IL App (1st) 162882, ¶ 43; *Filliung v. Adams*, 387 Ill. App. 3d 40, 51-52 (2008) (the purpose of a complaint is to define the claims in controversy, and if a party does not seek to amend his complaint, he cannot raise new claims in a summary judgment motion); *Steadfast Insurance Co. v. Caremark Rx, Inc.*, 373 Ill. App. 3d 895, 900 (2007) (“A party cannot seek summary judgment on a theory that was never pled in the complaint.”).

¶ 37 The complaint did not allege the restrictions violate the second amendment to the United States Constitution, and none of the six counts were labeled that way. Counts I and II sought a declaratory judgment that the Act violates the Illinois Constitution’s single-subject rule and three-readings requirement, respectively. Ill.

Const. 1970, art. IV, § 8(d). Count III sought a declaratory judgment that the legislature’s noncompliance with these rules denied plaintiffs due process. *Id.* art. I, § 2. Count VI alleged Decatur Jewelry had suffered a due process violation and a regulatory taking. And the complaint generally requested an injunction to enjoin enforcement of sections 24-1.9 and 24-1.10. Plaintiffs did not move for summary judgment on any of these claims, and none can be liberally construed as alleging a violation of the second amendment. *Bryson v. News America Publications, Inc.*, 174 Ill. 2d 77, 110 (1996) (“A complaint must be liberally construed, to the end that controversies may be quickly and finally determined according to the substantive rights of the parties.”); 735 ILCS 5/1-106 (West 2022).

¶ 38 The complaint mentioned the second amendment and article I, section 22, only in passing. Count IV cited article I, section 22, as it pertains to equal protection, and count V cited the second amendment as it pertains to special legislation. Both counts alleged the exemptions are subject to strict scrutiny because they impact a fundamental right. But invoking the right to keep and bear arms in the context of scrutinizing the Act’s classifications is not the same as alleging the restrictions violate the second amendment. Plaintiffs directed counts IV and V at the exemptions, not the restrictions themselves.

¶ 39 Furthermore, plaintiffs repeatedly disclaimed any second amendment violation. First, they explained in their memorandum for injunctive relief that “[t]his current litigation is *not* testing the contours of [weapons’] classification, *per se*—that debate is engaged in federal court—and a more fact intensive dispute regarding historical understandings of the Second Amendment.” (Emphasis added.)

¶ 40 Second, plaintiffs’ summary judgment motion invoked the second amendment only to demonstrate they were similarly situated to the exempted classes for equal protection purposes. Acknowledging the difference between the equal protection clause and the second amendment, plaintiffs asserted “The question presented is *not* whether a weapon classification survives constitutional challenge. Rather, the question presented is whether citizens qualified to acquire and possess firearms and firearm ammunition can be treated differently in the application of the weapon classification.” (Emphasis added.)

¶ 41 Plaintiffs made clear below that this dispute concerns equal protection and special legislation, but plaintiffs now attempt to piggyback a second amendment

claim onto those allegations to circumvent the fact-intensive *Bruen* analysis. The theory under which a case is tried in the circuit court cannot be changed on review, and an issue not presented to or considered by the circuit court cannot be raised for the first time on review. *In re Marriage of Schneider*, 214 Ill. 2d 152, 172 (2005). Allowing a party to change his theory of the case on review would weaken the adversarial process and the system of appellate jurisdiction and could also prejudice the opposing party, who did not have an opportunity to respond to that theory in the circuit court. *Id.*

¶ 42 The record demonstrates plaintiffs omitted a stand-alone second amendment claim from the complaint and expressly disclaimed it in the circuit court, resulting in waiver. Allowing plaintiffs to argue a novel theory that was neither pleaded nor argued below would prejudice defendants and amount to improper advocacy on plaintiffs’ behalf. Plaintiffs chose not to present their case to the circuit court in second amendment terms, and we hold them to their decision. Plaintiffs are procedurally barred from challenging the weapon classification as violating the second amendment.

¶ 43 Moreover, even if we accepted plaintiffs’ distorted view of the complaint or excused their unambiguous waiver, genuine questions of material fact would preclude summary judgment on a second amendment claim. Ascertaining whether the restrictions unconstitutionally infringe on the public’s right to keep and bear arms requires consideration of whether the regulated items are bearable arms that are commonly used for self-defense and whether the regulations are consistent with this nation’s historical traditions. Unsurprisingly, the record contains no evidence—beyond news articles—relevant to these questions because plaintiffs never raised them in the circuit court. Even if the complaint alleged a second amendment claim, the record does not support affirming the judgment on that basis. As plaintiffs expressly disclaimed a second amendment claim below, we offer no opinion on the potential viability of such a claim.

¶ 44 C. Equal Protection and Special Legislation

¶ 45 This appeal concerns plaintiffs’ assertion that the exemptions in sections 24-1.9 and 24-1.10 deny them equal protection. Article I, section 2, of the Illinois Constitution states that “[n]o person shall be deprived of life, liberty or property

without due process of law nor be denied the equal protection of the laws.” Ill. Const. 1970, art. I, § 2.

¶ 46 The equal protection clause guarantees that similarly situated individuals will be treated in a similar manner, unless the government can demonstrate an appropriate reason to treat those individuals differently. *In re M.A.*, 2015 IL 118049, ¶ 24. The equal protection clause does not forbid the legislature from drawing distinctions in legislation among different categories of people as long as the legislature does not draw those distinctions based on criteria wholly unrelated to the legislation’s purpose. *Id.* The analysis applied to equal protection claims is the same under both the United States and Illinois Constitutions. *Jacobson v. Department of Public Aid*, 171 Ill. 2d 314, 322 (1996).

¶ 47 The threshold question in the equal protection analysis is whether the claimant is “similarly situated” to the comparison group. “ ‘Evidence of different treatment of unlike groups does not support an equal protection claim.’ ” *M.A.*, 2015 IL 118049, ¶ 25 (quoting *In re Derrico G.*, 2014 IL 114463, ¶ 92). Two classes are similarly situated only when they are alike in all relevant respects. *Id.* ¶¶ 25, 33; *In re Destiny P.*, 2017 IL 120796, ¶ 15.

¶ 48 The determination of whether two classes are similarly situated is not made in the abstract. Rather, the court must consider the purpose of the particular legislation. *M.A.*, 2015 IL 118049, ¶¶ 26, 29. Assessing similarity

“is not a contextless comparison of the classes within the broader group. To meaningfully assess whether a claimant is similarly situated to all others in all relevant respects, we examine the positions of the claimant and all others in light of the broad purpose and operation of the statute. Whether a claimant is ‘similarly situated’ to other persons cannot be decided based solely on the very classification challenged as violating equal protection. Stated another way, a classification does not pass equal protection muster simply because the Legislature created two classes. To do so would beg the question and render the equal protection principle meaningless.” *Fletcher Properties, Inc. v. City of Minneapolis*, 947 N.W.2d 1, 22 (Minn. 2020).

¶ 49 The special legislation clause supplements the equal protection clause, and in many cases, the two clauses provide the same protection. *In re Estate of Jolliff*, 199

Ill. 2d 510, 519 (2002). The legislature enjoys broad discretion in making statutory classifications, but the special legislation clause prohibits the legislature from conferring a benefit or privilege upon one group while excluding other similarly situated groups. *Id.* The special legislation clause is intended to prevent legislative classifications without a sound and reasonable basis from discriminating in favor of a select group. *Id.* Plaintiffs concede the equal protection analysis in this action also applies to their special legislation challenge, as a special legislation challenge is generally judged under the same standards that apply to an equal protection challenge. *Moline School District No. 40 Board of Education v. Quinn*, 2016 IL 119704, ¶ 24.

¶ 50

1. Legislative Purpose

¶ 51

To assess whether plaintiffs are similarly situated to but treated differently from the exempt groups, we examine the relative positions of the two classes in light of the broad purpose and operation of the statute. The Act does not state a legislative purpose motivating the restrictions and exemptions in section 24-1.9 and 24-1.10. Defendants infer from the statutory scheme that the Act is intended to reduce the number of assault weapons and LCMs in circulation because they are often used by perpetrators of mass shootings.

¶ 52

Plaintiffs respond that inferring a legislative purpose where none is expressed amounts to improper speculation. They rely on *Accuracy Firearms*, which held the legislature's failure to articulate an express legislative purpose for the Act obviated the requirement for the equal-protection claimants to allege they were similarly situated to the exempt groups. *Accuracy Firearms*, 2023 IL App (5th) 230035, ¶ 61. The majority held,

“Here, it is extremely relevant that no purpose of the legislation and no basis for the classifications was provided at the time plaintiffs’ pleadings were filed. As such, any allegation regarding similarity would be speculative, at best. *** As the basis for the exempted classification was unavailable, it is undeniable that a specific allegation as to how any plaintiff might be similarly situated to one of the exempted classes would be pure conjecture, beyond the fact that each plaintiff and all those now in an exempted class were similarly situated, and indeed possessed the same rights, prior to January 23, 2023.” *Id.*

¶ 53 The *Accuracy Firearms* court was misguided in dispensing with the threshold question of whether the equal-protection claimants were similarly situated to the exempt groups. It is axiomatic that an equal-protection claimant must show he is similarly situated to the comparison group, and assessing the similarity requires an analysis of the legislation’s purpose. *Masterson*, 2011 IL 110072, ¶ 25. Sometimes, the legislative purpose is unclear, but that does not excuse the claimant from showing similarity. Justice Powell once observed in the equal protection context that “a legislative body rarely acts with a single mind” and “compromises blur purpose.” *Schweiker v. Wilson*, 450 U.S. 221, 244 n.6 (1981) (Powell, J., dissenting, joined by Brennan, Marshall, and Stevens, JJ.). “Therefore, it is appropriate to accord some deference to the executive’s view of legislative intent, as similarly we accord deference to the consistent construction of a statute by the administrative agency charged with its enforcement.” *Id.* “Ascertainment of actual purpose to the extent feasible, however, remains an essential step in equal protection.” *Id.*

¶ 54 When assessing a claimant’s similarity to the comparator class, a court may glean legislative purpose from the statutory scheme and the classifications themselves. See *Weinberger v. Wiesenfeld*, 420 U.S. 636, 648 n.16 (1975) (an examination of the legislative scheme and its history may demonstrate that the purpose asserted by the government could not have been a goal of the legislation).

¶ 55 Here, the trained professionals comprise seven enumerated categories of individuals who are exempt from the purchase and possession restrictions based on their employment status and training. Four of the exemptions apply to law enforcement agencies, peace officers, corrections officials, and certain current and retired law enforcement officers. Those who qualify are required by law to receive firearms training and qualifications. 720 ILCS 5/24-1.9(e)(1)-(4), 24-1.10(e)(1)-(4) (West 2022).

¶ 56 Specifically, the restrictions on the purchase or possession of assault weapons and LCMs do not apply to “ ‘Peace officers’ ” (*id.* §§ 24-1.9(e)(1), 24-1.10(e)(1)), who are defined as

“(i) any person who by virtue of his office or public employment is vested by law with a duty to maintain public order or to make arrests for offenses, whether that duty extends to all offenses or is limited to specific offenses, or (ii) any person who, by statute, is granted and authorized to exercise powers similar to

those conferred upon any peace officer employed by a law enforcement agency of this State” (*id.* § 2-13).

¶ 57 The exemption also applies to “Qualified law enforcement officers and qualified retired law enforcement officers,” defined under the federal Law Enforcement Officers Safety Act of 2004 (18 U.S.C. §§ 926B, 926C (2018)), as recognized under Illinois law, as employees of a governmental agency who are (or were) authorized by law to engage in or supervise the prevention, detection, investigation, or prosecution of, or the incarceration of any person for, any violation of law and has statutory powers of arrest or apprehension under section 807(b) of Title 10 of the United States Code (article 7(b) of the Uniform Code of Military Justice) (10 U.S.C. § 807(b) (2018)). 720 ILCS 5/24-1.9(e)(2), 24-1.10(e)(2) (West 2022). Qualified law enforcement officers must be authorized by the agency to carry a firearm, must not be the subject of any disciplinary action that could result in suspension or loss of police powers, must meet agency standards that require the employee to regularly qualify in the use of a firearm, must not be under the influence of alcohol or another intoxicating or hallucinatory drug or substance, and must not be prohibited by federal law from receiving a firearm. 18 U.S.C. § 926B (2018). Qualified retired law enforcement officers, though no longer authorized to engage in law enforcement, must have met these requirements before their separation from service, and they are further defined in part as having 10 years’ aggregate service and continuing to maintain, at their expense, training on the standards for qualification in firearms for active law enforcement officers. *Id.* § 926C.

¶ 58 The exemption similarly allows acquisition and possession of restricted items by federal, state, or local law enforcement agencies for the purpose of equipping peace officers, qualified law enforcement officers, and qualified retired law enforcement officers. 720 ILCS 5/24-1.9(e)(3), 24-1.10(e)(3) (West 2022). Finally, the exemption applies to wardens, superintendents, and keepers of prisons, penitentiaries, and jails. *Id.* §§ 24-1.9(e)(4), 24-1.10(e)(4).

¶ 59 Three other exempt classes include members of the armed services, reserve forces of the United States, or the Illinois National Guard; licensed private security guards and their employers; and guards at nuclear facilities, who all receive firearms training by virtue of their employment. *Id.* §§ 24-1.9(e)(5)-(7), 24-

1.10(e)(5)-(7). The Act permits these three groups to possess assault weapons and LCMs, but only while “performing their official duties.” *Id.* §§ 24-1.9(e)(5)-(7), 24-1.10(e)(5)-(7).

¶ 60 The Act’s grandfather provision permits persons who lawfully possessed an assault weapon before January 10, 2023, to continue to possess it as long as they provide an endorsement affidavit. *Id.* § 24-1.9(d). The affidavit must contain the person’s FOID card number and an affirmation that the affiant possessed the assault weapon before the Act’s effective date or inherited the assault weapon from an authorized person. *Id.* The provision restricts the transfer of an assault weapon to only an heir, an individual residing in another state and maintaining it in another state, or a federally licensed firearms dealer. *Id.* The grandfather provision similarly permits possession and restricts transfer of LCMs, but an endorsement affidavit is not required. *Id.* § 24-1.10(d).

¶ 61 The grandfather provision restricts where assault weapons and LCMs may be taken. A grandfathered individual may possess the restricted items only (1) on private property owned or immediately controlled by the person; (2) on private property that is not open to the public with the express permission of the person who owns or immediately controls such property; (3) while on the premises of a licensed firearms dealer or gunsmith for the purpose of lawful repair; (4) while engaged in the legal use of the assault weapon or LCM at a properly licensed firing range or sport shooting competition venue; or (5) while traveling to or from these locations, provided that the assault weapon or LCM is stored unloaded and enclosed in a case, firearm carrying box, shipping box, or other container. *Id.* §§ 24-1.9(d), 24-1.10(d).

¶ 62 Although the legislature did not state an express goal of the Act, the statutory scheme plainly implements firearms restrictions in furtherance of public health, safety, and welfare, with exceptions for those (1) who have undertaken specialized training as part of their employment in law enforcement, the military, or security or (2) who have a reliance interest in retaining possession of items legally acquired before such acquisition was prohibited and who adhere to new restrictions on possession and transfer. The Act attempts to balance public safety against the expertise of the trained professionals and the expectation interests of the grandfathered individuals.

¶ 63 The restrictions and exemptions are consistent with defendants’ representation that “the Act seeks to accomplish the legislative goal of reducing the number of assault weapons and LCMs in circulation, because they are often used by perpetrators of mass shootings,” and the method of accomplishing that goal is “limiting the number of firearms and magazines most likely to result in a mass shooting—by restricting the sale, purchase, and possession of new ones.” This legislative purpose informs our analysis of whether plaintiffs have alleged they are similarly situated to but treated differently from the exempt groups.

¶ 64 2. The Trained Professionals

¶ 65 Plaintiffs argue they were denied equal protection because “[t]he facial classification under the Act criminalizes acquisition or possession by some law-abiding citizens qualified to acquire or possess a firearm/bearable arm under the Second Amendment and immunizes from criminal penalty other law-abiding citizens qualified to acquire or possess under the Second Amendment. All are FOID card holders.”

¶ 66 Plaintiffs also make a parallel argument that the statutes constitute special legislation. Plaintiffs contend “the similarly situated comparator here are law-abiding gun-owners holding valid FOID cards qualified to acquire or possess firearms (bearable arms) in the home for defense under the preexisting fundamental right codified by the Second Amendment.”

¶ 67 Plaintiffs’ position is that as “law-abiding gun owners” they are similarly situated to the trained professionals because “[a]ll are FOID card holders” with second amendment rights. Plaintiffs’ position has intuitive appeal, but an examination of the FOID Act’s requirements demonstrates plaintiffs and the trained professionals are not similar in all relevant respects. See 430 ILCS 65/0.01 *et seq.* (West 2022).

¶ 68 A FOID card applicant must submit to the Illinois State Police evidence of eligibility, based on his or her age, citizenship, criminal history, and several other factors. See *id.* § 4(a). But FOID card eligibility does not entail any kind of firearms training or qualification in furtherance of public safety. A FOID card holder does not have a duty to maintain public order; to make arrests for offenses; or to prevent,

detect, investigate, prosecute, or incarcerate a person for a violation of law. By contrast, each of the seven categories of trained professionals must undergo specialized firearms training pertaining to their employment to maintain their exempt status under the Act. This training supports the presumption that they exercise greater responsibility in the safe handling and storage of firearms. “The charge of protecting the public, and the training that accompanies that charge, is what differentiates the exempted personnel from the rest of the population.” *Shew v. Malloy*, 994 F. Supp. 2d 234, 252 (D. Conn. 2014), *aff’d in part and rev’d in part sub nom. New York State Rifle & Pistol Ass’n v. Cuomo*, 804 F.3d 242 (2d Cir. 2015). “Similarly, members of the military and government agency personnel who use the otherwise banned firearms and magazines in the course of their employment should also have an advantage while maintaining public safety ***.” *Id.* Because FOID card holders are not similar in all relevant respects to the trained professionals, plaintiffs have not sufficiently alleged the similarly situated element, and their equal protection and special legislation challenges to the classification fail.

¶ 69

3. The Grandfathered Individuals

¶ 70

Plaintiffs next argue they are denied equal protection because the grandfathered individuals are afforded preferential treatment. Plaintiffs and the grandfathered individuals can retain their previously acquired restricted items but may acquire no more. Plaintiffs allege they “possess or desire to” acquire additional assault weapons and LCMs as prohibited by sections 24-1.9 and 24-1.10 of the Act.

¶ 71

The complaint alleges plaintiffs’ possession in the disjunctive. To the extent plaintiffs allege they do *not* already possess restricted items, they are prohibited from acquiring new ones, while the grandfathered individuals may retain theirs. But unlike plaintiffs who do not already possess restricted items, the grandfathered individuals have a reliance interest based on their acquisition before the restrictions took effect. By pointing out that those who already possess restricted items may retain them under the grandfather provision, the complaint makes clear that plaintiffs are not similarly situated to the exempt class. See *Purze v. Village of Winthrop Harbor*, 286 F.3d 452, 455 (7th Cir. 2002) (holding, in a challenge to a zoning decision, that the plaintiff was not similarly situated to others who received

different treatment for different reasons); *Jucha v. City of North Chicago*, 63 F. Supp. 3d 820, 831 (N.D. Ill. 2014) (grandfather provision rendered the claimant dissimilar to the comparator).

¶ 72 To the extent plaintiffs allege they already possess restricted items, plaintiffs may retain them but may not acquire more, which matches the restrictions placed on those who are grandfathered under the Act. The statutes treat plaintiffs who already possess assault weapons and LCMs the same as the grandfathered individuals.

¶ 73 Plaintiffs also argue “[t]he grandfathered possess the assault weapon because of the codified preexisting fundamental right to keep and bear arms for self-defense at home, not because of a legislative act upon which reliance was placed.” Plaintiffs essentially contend the restrictions infringe plaintiffs’ second amendment rights, while the exemptions protect the grandfathered individuals’ second amendment rights. This is tantamount to arguing the restrictions violate the second amendment, which plaintiffs expressly disclaimed below.

¶ 74 Plaintiffs’ equal protection challenge to the grandfather provision lacks merit, and by the same token, plaintiffs’ special legislation claim fails because sections 24-1.9 and 24-1.10 do not improperly discriminate in favor of the grandfathered group and against plaintiffs.

¶ 75 D. Three Readings

¶ 76 Finally, plaintiffs argue count II of their complaint provides an independent basis for affirming the judgment. Count II alleged that Public Act 102-1116, which added sections 24-1.9 and 24-1.10 to the Criminal Code of 2012, violates the three-readings requirement of the Illinois Constitution. The Constitution provides a “bill shall be read by title on three different days in each house.” Ill. Const. 1970, art. IV, § 8(d). Count II alleged that the legislature did not follow this procedure and that therefore the Act should be invalidated in its entirety. See *Friends of the Parks v. Chicago Park District*, 203 Ill. 2d 312, 328 (2003) (three readings violation would invalidate entire public act).

¶ 77 As mentioned, a reviewing court may affirm the judgment on any grounds called for by the record, regardless of whether the circuit court made its decision on the proper ground. *Landmarks Preservation Council of Illinois*, 125 Ill. 2d at 174. But a party seeking to modify a partially adverse judgment must file a cross-appeal within 30 days of the judgment. *Id.* (“findings of the circuit court adverse to the appellee do not require that the appellee cross-appeal if the judgment of the circuit court was not, at least in part, against him”); *Material Service Corp. v. Department of Revenue*, 98 Ill. 2d 382, 387 (1983) (an appellee’s failure to cross-appeal from the part of the judgment denying a claim for interest precluded consideration of the issue); see Ill. S. Ct. R. 303(a)(3) (eff. July 1, 2017).

¶ 78 Here, the circuit court invalidated sections 24-1.9 and 24-1.10 but upheld the remainder of the Act, including provisions that are unrelated to this action. Besides adding sections 24-1.9 and 24-1.10, Public Act 102-1116 amended section 2605-35 of the Illinois State Police Law of the Civil Administrative Code of Illinois to clarify that the Division of Criminal Investigation may investigate human trafficking, illegal drug trafficking, and illegal firearms trafficking. See Pub. Act 102-1116, § 5 (eff. Jan. 10, 2023) (amending 20 ILCS 2605/2605-35(a)(7)). Public Act 102-1116 also amended section 1-10 of the Illinois Procurement Code to exempt the Illinois State Police’s purchase of software to enforce the Firearm Owners Identification Card Act (430 ILCS 65/0.01 *et seq.* (West 2022)) and related statutes. See Pub. Act 102-1116, § 7 (eff. Jan. 10, 2023) (adding 30 ILCS 500/1-10(b)(21)). And Public Act 102-1116 amended sections 40, 45, and 55 of the Firearms Restraining Order Act to increase the initial duration of such orders to up to one year. See Pub. Act 102-1116, § 15 (eff. Jan. 10, 2023) (amending 430 ILCS 67/40, 45, 55).

¶ 79 The judgment was partially adverse to plaintiffs because it did not invalidate the entire Act as requested in count II. Plaintiffs’ failure to cross-appeal from the part of the judgment denying relief on their three-readings claim is a jurisdictional bar to them arguing the Act is unconstitutional on that basis. *Landmarks Preservation Council of Illinois*, 125 Ill. 2d at 174.

¶ 80

III. CONCLUSION

¶ 81

First, we hold the circuit court erroneously entered summary judgment for plaintiffs on their equal protection and special legislation claims. Plaintiffs are not similarly situated to the trained professionals. To the extent plaintiffs claim they possess restricted items, they are not treated differently from the grandfathered individuals. To the extent plaintiffs claim they do *not* possess restricted items, they are dissimilar to the grandfathered individuals, who have a reliance interest in retaining them.

¶ 82

Second, we hold that plaintiffs waived any second amendment challenge to the restrictions, as the complaint did not state a claim and plaintiffs explicitly and repeatedly disclaimed any such argument in the circuit court. Third, we hold plaintiffs' failure to cross-appeal from the denial of relief under count II bars them from renewing their three-readings claim here. For these reasons, the judgment of the circuit court of Macon County is reversed.

¶ 83

Judgment reversed.

¶ 84

JUSTICE HOLDER WHITE, dissenting:

¶ 85

This great nation was founded on the premise that the right of law-abiding citizens to bear arms is essential to what it means to be a free people. The right of law-abiding citizens to possess firearms and to arm themselves to protect their families, their homes, and themselves must not be infringed. Belief in the previously mentioned precepts in no way diminishes the fact that all law-abiding citizens desire safe communities where schools, workplaces, houses of worship, and public gatherings are free from gun violence. The tension between the previously mentioned tenets are why this case is of such importance to the people of the state of Illinois. However, if this court is to adhere to the Illinois Constitution, we cannot address the question of the firearm restrictions at issue in this case. Important as this case is, constitutionally embedded process matters. Where the legislature fails to honor our constitutionally mandated process, this court is duty bound to adhere to our constitution and require the legislature to do the same. In my view, this court can and should consider the issue of the three-readings rule as

well as the continued adherence to the enrolled-bill doctrine. In doing so, I would find the clear violation of the rule renders Public Act 102-1116 (eff. Jan. 10, 2023) unconstitutional in its entirety, thereby obviating the need to address the firearm restrictions at issue in this appeal. Thus, I respectfully dissent.

¶ 86

A. Plaintiffs' Claim on the Three-Readings Rule

¶ 87

As the majority notes and as this court has often found, “a reviewing court can uphold the decision of the circuit court on any grounds which are called for by the record regardless of whether the circuit court relied on the grounds and regardless of whether the circuit court’s reasoning was correct.” *Ultsch v. Illinois Municipal Retirement Fund*, 226 Ill. 2d 169, 192 (2007); see also *Material Service Corp. v. Department of Revenue*, 98 Ill. 2d 382, 387 (1983) (stating “[i]t is the judgment and not what else may have been said by the lower court that is on appeal to a court of review”).

¶ 88

In this case, plaintiffs alleged in count II of their complaint that Public Act 102-1116, which added sections 24-1.9 and 24-1.10 to the Criminal Code of 2012 (720 ILCS 5/24-1.9, 1.10 (West 2022)), violated the three-readings requirement of the Illinois Constitution. In their summary judgment motion, defendants argued they were entitled to summary judgment on the three-readings claim because the enrolled-bill doctrine foreclosed plaintiffs’ challenge. The circuit court entered judgment in defendants’ favor on the three-readings claim, as it was duty bound to follow this court’s precedent involving the enrolled-bill doctrine. The court did, however, find in plaintiffs’ favor on their equal protection and special legislation claims.

¶ 89

Defendants appealed. In light of the circuit court’s favorable ruling on the three-readings rule, they had no reason to raise the issue in their initial brief. Plaintiffs, however, did raise this issue in their responsive brief, arguing the violation of the three-readings rule presented an independent basis in the record to affirm the circuit court’s judgment. In their reply brief, defendants argued there was no violation of the three-readings rule and the enrolled-bill doctrine foreclosed plaintiffs’ challenge. Defendants also addressed the three-readings rule and the enrolled-bill doctrine in their oral argument to this court.

¶ 90 The majority says the circuit court invalidated certain sections of the Protect Illinois Communities Act (Act) (see Pub. Act 102-1116 (eff. Jan. 10, 2023)) and upheld others and thus contends the three-readings-rule issue is not now before us because plaintiffs should have cross-appealed from the denial of relief on that claim. However, plaintiffs are properly before this court, and both parties have had ample opportunity to address the procedural requirements of the Illinois Constitution and their impact on the validity of the Act here. Moreover, if the invalidated sections are before us (by way of the State’s appeal), then a finding of a three-readings-rule violation on those sections (as we may affirm on any basis in the record) requires a similar finding as to the entire Act because the Act was passed as one. Thus, I would find the long-standing principle cited above in *Ultsch* and numerous other cases allows us to consider the three-readings issue.

¶ 91 B. The Three-Readings Rule and the Enrolled-Bill Doctrine

¶ 92 Article IV, section 8, of the Illinois Constitution (Ill. Const. 1970, art. IV, § 8) sets forth the requirements for the passage of bills in the legislature. Section 8(d) states as follows:

“(d) *A bill shall be read by title on three different days in each house. A bill and each amendment thereto shall be reproduced and placed on the desk of each member before final passage.*

Bills, except bills for appropriations and for the codification, revision or rearrangement of laws, shall be confined to one subject. Appropriation bills shall be limited to the subject of appropriations.

A bill expressly amending a law shall set forth completely the sections amended.

The Speaker of the House of Representatives and the President of the Senate shall sign each bill that passes both houses to certify that the procedural requirements for passage have been met.” (Emphases added.) Id. § 8(d).

¶ 93 For years, this court has followed the enrolled-bill doctrine. *Friends of the Parks v. Chicago Park District*, 203 Ill. 2d 312, 328 (2003). “This doctrine provides that once the Speaker of the House of Representatives and the President of the

Senate certify that the procedural requirements for passing a bill have been met, a bill is conclusively presumed to have met all procedural requirements for passage.” *Id.* at 328-29. Under this precedent, this court has said it “will not invalidate legislation on the basis of the three-readings requirement if the legislation has been certified.” *Id.* at 329.

¶ 94 In *People v. Dunigan*, 165 Ill. 2d 235, 252 (1995), the defendant argued the public act at issue was not validly enacted because the legislature failed to comply with the three-readings requirement. This court refused to consider the argument, concluding the enrolled-bill doctrine precluded “this court from inquiring into the legislature’s compliance with the procedural requirements for passage of bills.” *Id.* at 253. This court cited the Committee on the Legislature of the Constitutional Convention, which explained the enrolled-bill doctrine would prohibit the judiciary from invalidating statutes on the ground that the legislature failed to comply with the procedural requirements in article IV, section 8, of the Illinois Constitution. *Id.* The court went on to state: “Whether or not a bill has been read by title on three different days in each house is a procedural matter, the determination of which was deliberately left to the presiding officers of the two houses of the General Assembly.” *Id.* at 254.

¶ 95 Justice Heiple dissented from that portion of the majority opinion that adopted and relied on the enrolled-bill doctrine. *Id.* at 256-58 (Heiple, J., concurring in part and dissenting in part). He stated, in part, as follows:

“The interpretation of a constitutional provision depends, in the first instance, on the plain meaning of its language. Next, it depends on the common understanding of the citizens who, by ratifying the constitution, have given it life. A court looks to the debates of the convention delegates only when a constitutional provision is ambiguous. (*Kalodimos v. Village of Morton Grove* (1984), 103 Ill. 2d 483, 492-93.) There is no ambiguity in the provision requiring the legislature to read a bill on three different days in each house, the provision that a bill receive a majority vote in each house, or the provision requiring the Speaker of the House and the President of the Senate to sign each bill to certify that the procedural requirements for passage have been met.

If it were deemed desirable to foreclose inquiries into the regularity of the passage of bills, language similar to the enrolled-bill doctrine could have been

included within the constitution. There is no such language. Moreover, the Illinois Constitution was adopted at a referendum. It did not become the law of the State by either the discussions of the delegates or by their votes. The constitutional convention merely submitted the document to the public for a vote. There is no way that a voter could interpret the language of the constitution to mean that procedural requirements for the passage of a bill could be overridden by the signatures of two State officers. In truth, the signatures of the officers are merely *prima facie* evidence that the General Assembly has abided by the requirements of the constitution. In other words, it raises a rebuttable presumption that the requirements for passage have been met.

A literal adherence to this so-called enrolled-bill doctrine means that a bill need never be read or presented in either house, need never receive a majority vote, and need never even be voted on. Two people, the Speaker of the House and the President of the Senate, need merely sign and certify a bill and, unless vetoed by the Governor pursuant to article IV, section 9, the bill becomes *ipso facto* the law of Illinois. Contrary to today's ruling, I believe that the constitutional requirements for the enactment of a bill should be followed and enforced. While separation of powers is a valid doctrine and a presumption of legislative regularity is its proper corollary, this court should reserve the right of review to ensure the General Assembly's compliance with constitutional mandates." *Id.* at 257-58.

¶ 96 Since that case, this court has noted the legislature has "shown remarkably poor self-discipline in policing itself in regard to the three-readings requirement." *Friends of the Parks*, 203 Ill. 2d at 329 (citing *Geja's Cafe v. Metropolitan Pier & Exposition Authority*, 153 Ill. 2d 239, 260 (1992) (noting that "ignoring the three-readings requirement has become a procedural regularity"); *Cutinello v. Whitley*, 161 Ill. 2d 409, 425 (1994). That lack of legislative self-discipline continues to this day. See *Orr v. Edgar*, 298 Ill. App. 3d 432, 447 (1998) (leaving to this court "the issue of whether the state legislature may disregard constitutional requirements and maintain the legality of its actions under the auspices of the enrolled bill doctrine"); *New Heights Recovery & Power, LLC v. Bower*, 347 Ill. App. 3d 89, 100 (2004); *McGinley v. Madigan*, 366 Ill. App. 3d 974, 992 (2006); *Doe v. Lyft, Inc.*, 2020 IL App (1st) 191328, ¶¶ 51-55; *Accuracy Firearms, LLC v. Pritzker*, 2023 IL App (5th) 230035, ¶¶ 36-46; *First Midwest Bank v. Rossi*, 2023 IL App (4th) 220643,

¶¶ 220-41; *Rowe v. Raoul*, 2023 IL 129248, ¶ 8 (noting the plaintiffs raised a three-readings rule claim in the circuit court¹).

¶ 97 In *Friends of the Parks*, 203 Ill. 2d at 329, this court noted it is “ever mindful of its duty to enforce the constitution of this state” and “urge[d] the legislature to follow the three-readings rule.” The court went on to state that, “[w]hile separation of powers concerns militate in favor of the enrolled-bill doctrine [citation], our responsibility to ensure obedience to the constitution remains an equally important concern.” *Id.*; see also *Field v. Clark*, 143 U.S. 649, 670 (1892) (stating it is “the duty of this court, from the performance of which it may not shrink, to give full effect to the provisions of the Constitution relating to the enactment of laws”). In *Geja’s Cafe*, 153 Ill. 2d at 260, this court declined the invitation to abandon the enrolled-bill doctrine, feeling “the doctrine of separation of powers is more compelling.” However, this court deferred to the legislature “hesitantly” and “reserve[d] the right to revisit this issue on another day to decide the continued propriety of ignoring this constitutional violation.” *Id.*

¶ 98 Recently, in a case involving the very Act at issue in this case, the Fifth District in *Accuracy Firearms* addressed the serious concerns raised by the plaintiffs there as to the legislature’s repeated failure to adhere to the requirements of article IV, section 8(d), and the three-readings rule.

“Unfortunately, the Illinois Supreme Court’s warnings regarding past legislative nonconformance with constitutional boundaries (see *Friends of the Parks*, 203 Ill. 2d at 328-29) appear to have gone unheeded and, instead, are now interpreted as the judiciary’s acceptance of, or the judiciary’s acquiescence in, the legislature’s continued failure to adhere to constitutional procedures when enacting legislation. While compliance with the enrolled-bill doctrine presumes the legislative procedure adhered to constitutional requirements (see *Geja’s Cafe*, 153 Ill. 2d at 259), such presumption is readily overcome by evidence revealing the contrary posted on the General Assembly website.

We question the sagacity of continued adherence to the Illinois Supreme Court precedent in light of the legislature’s continued blatant disregard of the

¹The *Rowe* plaintiffs did not raise the three-readings issue in their appeal to this court.

court’s warnings and the constitutional mandates. The three-reading requirement ensures that the legislature is fully aware of the contents of the bills upon which they will vote and allows the lawmakers to debate the legislation. Equally relevant to the three-reading rule is the opportunity for the public to view and read a bill prior to its passage, thereby allowing the public an opportunity to communicate either their concern or support for proposed legislation with their elected representatives and senators. Taken together, two foundations of the bedrock of democracy are decimated by failing to require the lawmakers to adhere to the constitutional principle.

To be sure, Illinois is not the only state that has faced or endured repeated ethical lapses associated with gut and replace legislation. However, other states have addressed this issue and demand compliance with the state constitutional mandates. See *Washington v. Department of Public Welfare of Pennsylvania*, 188 A.3d 1135 (Pa. 2018); *State ex rel. Ohio ALF-CIO v. Voinovich*, 69 Ohio St. 3d 225, 1994-Ohio-1, 631 N.E.2d 582; *Bevin v. Commonwealth ex rel. Beshear*, 563 S.W.3d 74 (Ky. 2018); *League of Women Voters of Honolulu v. State*, 499 P.3d 382 (Haw. 2021).

Our lawmakers take an oath of office to ‘ “support the constitution of the United States, and the constitution of the state of Illinois.” ’ 25 ILCS 5/2 (West 2020); Ill. Const. 1970, art. XIII, § 3. The same is required for the circuit court judiciary (705 ILCS 35/2 (West 2020)) as well as the appellate and supreme courts and certain members of the executive branch (Ill. Const. 1970, art. XIII, § 3). Allowing lawmakers to continue to ignore constitutional mandates under the enrolled-bill doctrine, knowing full well the constitutional requirements were not met, belittles the language of the oaths, ignores the need for transparency in government, and undermines the language of this state’s constitution.” *Accuracy Firearms*, 2023 IL App (5th) 230035, ¶¶ 42-45.

¶ 99

Given the legislature’s repeated failures, continued adherence to the enrolled-bill doctrine should no longer be countenanced. The doctrine “is contrary to modern legal thinking, which does not favor conclusive presumptions that may produce results which do not accord with fact.” *Association of Texas Professional Educators v. Kirby*, 788 S.W.2d 827, 829 (Tex. 1990); *D&W Auto Supply v. Department of Revenue*, 602 S.W.2d 420, 424 (Ky. 1980) (stating the doctrine “frequently ***

produces results which do not accord with facts or constitutional provisions”). Moreover, “[t]he rule disregards the primary obligation of the courts to seek the truth and to provide a remedy for a wrong committed by any branch of government.” *D&W Auto Supply*, 602 S.W.2d at 424.

¶ 100 Although this court has, in the past, found separation of powers to be a reason to decline abandoning the doctrine, it has not found it to be an absolute bar. This court has repeatedly reminded the legislature that it must comply with the bill-passage requirements of the constitution and, if it does not, this court reserves the right to act.

¶ 101 No doctrine can exempt from judicial review the requirements of the constitution. “It is emphatically the province and duty of the judicial department to say what the law is.” *Marbury v. Madison*, 5 U.S. (1 Cranch) 137, 177 (1803).

“ ‘We may not abdicate this responsibility under the guise of our deference to a co-equal branch of government. While it is appropriate to give due deference to a co-equal branch of government as long as it is functioning within constitutional constraints, it would be a serious dereliction on our part to deliberately ignore a clear constitutional violation.’ ” *City of Philadelphia v. Commonwealth*, 838 A.2d 566, 581 (Pa. 2003) (quoting *Consumer Party of Pennsylvania v. Commonwealth*, 507 A.2d 323, 333 (Pa. 1986)).

See also *D&W Auto Supply*, 602 S.W.2d at 424 (disagreeing with “the premise that the equality of the various branches of government requires that we shut our eyes to constitutional failings and other errors of our coparceners in government”).

¶ 102 This court cannot cede the constitutionality of a statute to the Speaker of the House of Representatives and the President of the Senate. To turn a blind eye to repeated violations of the constitution suggests “that the courts must perpetually remain in ignorance of what everybody else in the state knows.” *Power, Inc. v. Huntley*, 235 P.2d 173, 181 (Wash. 1951) (*en banc*); see also *D&W Auto Supply*, 602 S.W.2d at 423 (“To countenance an artificial rule of law that silences our voices when confronted with violations of our constitution is not acceptable to this court.”).

¶ 103 As Justice Heiple suggested and as other courts have advocated, “the signatures of the officers are merely *prima facie* evidence that the General Assembly has abided by the requirements of the constitution. In other words, it raises a rebuttable presumption that the requirements for passage have been met.” *Dunigan*, 165 Ill. 2d at 28 (Heiple, J., concurring in part and dissenting in part); *Association of Texas Professional Educators*, 788 S.W.2d at 829 (stating “the present tendency favors giving the enrolled version only *prima facie* presumptive validity, and a majority of states recognize exceptions to the enrolled bill rule”). That “presumption may be overcome by clear, satisfactory and convincing evidence establishing that constitutional requirements have not been met.” *D&W Auto Supply*, 602 S.W.2d at 425.

¶ 104 Given the record here, including taking judicial notice of the history of the legislation on the General Assembly’s website, I would find the presumption is clearly overcome in this case. See *Board of Education of Richland School District No. 88A v. City of Crest Hill*, 2021 IL 126444, ¶ 5 (“ ‘Illinois courts often take judicial notice of facts that are readily verifiable by referring to sources of indisputable accuracy’ such as court records or public documents, including records on [a] government website.” (quoting *People v. Johnson*, 2021 IL 125738, ¶ 54)).

¶ 105 In this case, House Bill 5471 (HB 5471) (102d Ill. Gen. Assem., House Bill 5471, 2022 Sess.) was first introduced in the Illinois House of Representatives on January 28, 2022, as “an Act concerning regulation,” seeking to amend the Illinois Insurance Code (215 ILCS 5/1 *et seq.*). The synopsis for HB 5471, which was approximately 10 pages in length, indicated the subject of the bill focused on providing the e-mail address of the public adjuster as well as other provisions regarding an insurance contract. 102d Ill. Gen. Assem., House Bill 5471, 2022 Sess. A second reading of HB 5471 occurred on March 1, 2022. *Id.* Then, along with 43 other bills voted on at the same time as a group, HB 5471 received its third reading (as a bill for an act concerning regulation) on March 4, 2022, receiving 104 yeas and 0 nays. *Id.*

¶ 106 On March 7, 2022, HB 5471 arrived in the Illinois Senate and received its first reading before being referred to the assignments committee. The second reading took place on November 30, 2022. *Id.*

¶ 107 On January 8, 2023, the President of the Senate filed Senate floor amendment No. 1, which, in its 110 pages, completely stripped the insurance provisions of HB 5471 and replaced them with the “Protect Illinois Communities Act.” On January 9, 2023, amendments 2, 3, 4, and 5, all of which addressed amendment 1, were presented in the Senate and passed on its third reading with 34 yeas and 20 nays. *Id.*

¶ 108 In its new form, HB 5471 was sent back to the House on January 10, 2023. HB 5471, as amended, was not read three times prior to voting on the bill. On January 10, 2023, the House voted to concur with Senate amendments 3, 4, and 5 with 68 yeas and 41 nays on each one. That same day, the Speaker of the House of Representatives and the President of the Senate certified that the procedural requirements of the constitution had been met, and Governor Pritzker signed the 111-page Act into law. *Id.*

¶ 109 Here, it is abundantly clear that the Protect Illinois Communities Act was not before the House or the Senate on three different days in each house. On January 8 and 9, 2023, the original Insurance Code bill was gutted, and the new amendments, including the restrictions on assault weapons and large-capacity magazines, were considered and approved in the Senate. The new bill setting forth the Protect Illinois Communities Act then only spent one day in the House before it was passed and signed into law.

“[T]he three readings requirement serves three important purposes: it (1) provides the opportunity for full debate on proposed legislation; (2) ensures that members of each legislative house are familiar with a bill’s contents and have time to give sufficient consideration to its effects; and (3) provides the public with notice and an opportunity to comment on proposed legislation.” *League of Women Voters of Honolulu v. State*, 499 P.3d 382, 396 (Haw. 2021).

See also *Schwegmann Brothers v. Calvert Distillers Corp.*, 341 U.S. 384, 396 (1951) (Jackson, J., concurring, joined by Minton, J.) (noting the three-readings requirement is intended “to make sure that each House knows what it is passing and passes what it wants”). On the contrary, the practice of gutting and replacing legislation “discourages public confidence and participation,” “deprives the public of notice,” and “is antithetical to the intent of the three readings requirement.” *League of Women Voters*, 499 P.3d at 405.

¶ 110 In this case, the Insurance Code bill that received votes on three different days in the House in 2022 was in no way the firearms bill that passed the House on one vote in 2023. That is undeniable. And concluding that simply reading the title of a completely different bill on three different days suffices to pass constitutional muster is an affront to the people of this state and renders the three-readings requirement essentially meaningless. No such conclusion—whether expressed or implied—should receive the imprimatur of this court.

¶ 111 Article IV, section 8, of the Illinois Constitution requires a bill be read by title on three different days in each house. Three different days in each house is all it would have taken for the legislators to consider the firearms bill before passage and thereby comply with the procedural requirements of the constitution. And three different days in each house is all it would take for the House and Senate to conduct the legislative process again if this court were to find a violation of the three-readings rule and declare the Act unconstitutional.

¶ 112 When, as in this case, the work of the legislature directly impacts a fundamental right, which this court has said the right to keep and bear arms is (*Guns Save Life, Inc. v. Ali*, 2021 IL 126014, ¶ 28), the people of Illinois deserve nothing less than the procedural requirements of the constitution be followed by their elected representatives and senators.

¶ 113 Because the procedural requirements of the constitution were not met in the passage of HB 5471, I would find the Act unconstitutional in its entirety. Thus, until this court has before it a validly passed act of the legislature, we should make no determination on the Act at issue in this case. Accordingly, I respectfully dissent.

¶ 114 JUSTICE OVERSTREET joins in this dissent.

¶ 115 JUSTICE O'BRIEN, dissenting:

¶ 116 I respectfully dissent because I do not find that the classifications at issue in this legislation further its claimed purpose and it is thus violative of the special legislation provision in our state constitution.

¶ 117 The special legislation clause states:

“The General Assembly shall pass no special or local law when a general law is or can be made applicable. Whether a general law is or can be made applicable shall be a matter for judicial determination.” Ill. Const. 1970, art. IV, § 13.

¶ 118 “This court has consistently held that the purpose of the special legislation clause is to prevent arbitrary legislative classifications that discriminate in favor of a select group without a sound, reasonable basis.” *Best v. Taylor Machine Works*, 179 Ill. 2d 367, 391 (1997). Under the clause, the General Assembly may not confer “a special benefit or exclusive privilege on a person or a group of persons to the exclusion of others similarly situated.” *Id.*

¶ 119 We employ a two-part test to determine whether a law is special legislation. *Piccioli v. Board of Trustees of the Teachers’ Retirement System*, 2019 IL 122905, ¶ 18. The first determination is whether the classification discriminates in favor of a select group to the exclusion of a group similarly situated. *Id.* If the classification does discriminate, we next determine whether the classification is arbitrary. *Id.* We use the same standards applicable to equal protection challenges to decide if a classification is arbitrary. *In re Estate of Jolliff*, 199 Ill. 2d 510, 520 (2002).

¶ 120 Unlike the majority, I would find that the plaintiffs are similarly situated in light of the purpose of the legislation. *In re M.A.*, 2015 IL 118049, ¶ 29 (“The determination whether individuals are similarly situated generally can only be made by considering the purpose of the particular legislation.”). We do so by considering whether the classification is “based upon reasonable differences in kind or situation, and whether the basis for the classifications is sufficiently related to the evil to be obviated by the statute.” *Best*, 179 Ill. 2d at 394.

¶ 121 The majority finds that the plaintiffs are not similarly situated to the exempted classifications and ends its analysis on that basis. To make the similarly situated determination, this court must view the classifications in light of the purpose of the legislation and the evils it seeks to remedy. *In re Belmont Fire Protection District*, 111 Ill. 2d 373, 380 (1986). The majority acknowledges that the legislation itself does not state a purpose but concludes that the defendants infer the intent of the Protect Illinois Communities Act (Act) (see Pub. Act 102-1116 (eff. Jan. 10, 2023)) is “to reduce the number of assault weapons and LCMs in circulation” because they are often used in mass shootings. *Supra* ¶ 51. The majority correctly reiterates that,

to determine whether the plaintiffs are similarly situated, the legislative purpose of the Act must frame its analysis. *Supra* ¶ 53.

¶ 122 The majority, however, did not consider whether the classifications further the legislative purpose of reducing the number of assault weapons and large capacity magazines (LCMs) and consequently the number of mass shootings. I find they do not and will not reasonably remedy the evils the legislation was designed to combat. Importantly, exempting the professionals and grandfathered groups does nothing to prevent the proliferation of out-of-state assault weapon possession or prevent those weapons from being used for mass shootings in this state or elsewhere. The legislation does not prevent weapon manufacturers, some located within this state, from continuing to sell assault weapons and LCMs to out-of-state residents, who may then potentially perpetrate a mass shooting. Because 60% of the weapons used in crimes in Illinois come from out of state, the legislation does not further its purported goal of reducing the number of weapons in the state. See Violence Prevention and Public Safety, Office of the Ill. Attorney Gen., <https://illinoisattorneygeneral.gov/Safer-Communities/Violence-Prevention-and-Community-Safety/Crime-Connect/> (last visited Aug. 7, 2023) [<https://perma.cc/JWG4-5874>].

¶ 123 Similarly, the enumerated professional groups who are exempted based on their firearm training and roles as societal protectors are presumably not apt to engage in mass shootings, and their ability to possess assault weapons and LCMs does not reduce either the number of assault weapons and LCMs or the threat of mass shootings. They may continue to possess and purchase the items the legislation bans nearly everyone else from possessing and purchasing. Moreover, not all the professionals are limited in the possession and use of their assault weapons to on-duty conduct, which places them in the same circumstance as members of the general public who may also have weapons training. For example, retired peace officers may continue to purchase and possess assault weapons despite that they no longer have any peacekeeping responsibilities or obligations. They are no different from private citizens who hold Firearm Owner's Identification cards, like the plaintiffs in this case, but are granted special treatment. Our constitution's prohibition against special legislation does not allow a law to afford special treatment to one group of citizens without a rational basis to do so. The special legislation provision in the constitution prohibits the different treatment of people based on criteria unrelated to the legislation's purpose. *Best*, 179 Ill. 2d at 391.

- ¶ 124 The professional group, albeit the recipients of firearm training, are not necessarily trained in assault weapons. Moreover, other nonexempted professionals and the general population may also have firearm and/or assault weapon training. According to an affidavit submitted by Caulkins in support of the plaintiffs' combined motion for declaratory judgment and/or temporary or permanent injunction, in his opinion, his gun shop customers are as skilled with their firearms as the exempted professional class. Limiting the possession and purchase of assault weapons to this group does not contribute to the reduction of mass shootings.
- ¶ 125 The grandfathered group, created because of their reliance interest in prior ownership of the banned weapons and magazines, are allowed to maintain their weapons, which also does little to reduce the number of assault weapons and LCMs or mass shootings. According to the plaintiffs, there are numerous Illinois residents who currently own assault weapons. Any one of these assault weapons owners could perpetrate a mass shooting.
- ¶ 126 When considering the challenged classifications in light of the purpose of the law, neither of the classifications furthers the purpose. In this way, I find the plaintiffs are similarly situated in light of the purposes of the legislation and the evils it was designed to remedy. It is not enough that the legislature classified the groups; the classifications must be based on "reasonable differences in kind or situation, and whether the basis for the classifications is sufficiently related to the evil to be obviated by the statute." *Id.* at 394. The classifications must be founded on a rational or substantial difference of situation or condition. *Cutinello v. Whitley*, 161 Ill. 2d 409, 427 (1994) (Freeman, J., dissenting).
- ¶ 127 Here, the classifications afford special treatment to two groups of individuals without a viable connection between the exempted groups and reasons for the legislation. When considered in light of the offered purpose for the legislation, to reduce the number of weapons in order to reduce the number of mass shootings, the exempted classifications are in all aspects like the general population.
- ¶ 128 In dissenting, I do not pass judgment on the intent of the legislation. Rather, I only consider whether it meets the constitutional requirements under the equal protection and special legislation provisions of our Illinois Constitution. When we limit people's rights, even the rights we might not like, we have to do so in a way that honors the constitution.

“Unless this court is to abdicate its constitutional responsibility to determine whether a general law can be made applicable, the available scope for legislative experimentation with special legislation is limited, and this court cannot rule that the legislature is free to enact special legislation simply because ‘reform may take one step at a time.’ ” *Grace v. Howlett*, 51 Ill. 2d 478, 487 (1972) (quoting *Williamson v. Lee Optical of Oklahoma, Inc.*, 348 U.S. 483, 489 (1955)).

Under the special legislation clause, the constitutional test is “whether a general law can be made applicable.” *Id.* I would find a general law could be made applicable.

¶ 129 Because the majority fails to undertake this appropriate analysis and finds the plaintiffs are not similarly situated, I respectfully dissent. I would find the legislation violates the constitutional prohibition against special legislation.

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC, et al.,

Plaintiffs,

v.

JB PRITZKER, Governor of Illinois, in his
official capacity, et al.,

Defendants.

Case No. 2023-MR-4

**THE GOVERNOR AND THE ATTORNEY GENERAL'S RESPONSE TO PLAINTIFFS'
EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER**

Dated: January 18, 2023

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TABLE OF CONTENTS

INTRODUCTION	1
BACKGROUND	2
LEGAL STANDARD	3
I. Plaintiffs are unlikely to succeed on the merits of their claims.	4
A. Plaintiffs’ single-subject challenge fails because the Act’s provisions all relate to the regulation of firearms.	4
B. The Illinois Supreme Court’s enrolled billed doctrine forecloses Plaintiffs’ challenge under the three-readings clause.	9
C. Plaintiffs’ attempt to recycle their single-subject and three-readings challenges as a procedural due process claim fails as a matter of law.	11
D. Plaintiffs’ equal protection challenge fails because the Act’s exceptions draw a rational distinction based on military and law enforcement training and experience.	13
II. Plaintiffs have not shown they will suffer irreparable harm without a TRO.	16
CONCLUSION	18

INTRODUCTION

Plaintiffs ask this Court to enjoin Public Act 102-1116 (“the Act”), which restricts the sale of assault weapons and large capacity magazines and requires current owners of these items to register them with the Illinois State Police before next year. Plaintiffs—businesses that sell assault weapons and individuals who own them—do not challenge the Act based on the Second Amendment to the U.S. Constitution or the analogous provision under the Illinois Constitution. Instead, they bring three claims attacking the legislative process, and a fourth claim alleging an equal protection violation based on certain exceptions in the Act. None of Plaintiffs’ claims have merit. Their request for a temporary restraining order (“TRO”) must be denied.

Plaintiffs fault the passage of the Act for alleged non-compliance with the single-subject and three-readings clauses in the Illinois Constitution. Their single-subject challenge fails because every provision in the Act relates to a single subject: the regulation of firearms. Similarly, Plaintiffs’ three-readings clause claim is foreclosed by the enrolled bill doctrine. Conceding as much in their complaint, Plaintiffs attempt to repackage their three-readings claim as a procedural due process claim. But this novel attempt at bootstrapping has no basis in law and fares no better.

Plaintiffs’ equal protection claim is equally flawed. Although Plaintiffs try to shoehorn their way into strict scrutiny, they can point to neither a protected class nor a fundamental right recognized under Illinois law that is implicated by the Act. The Act’s exceptions for professionals with specialized firearms training and experience, such as law enforcement and members of the military, easily survive rational basis scrutiny.

Plaintiffs have also failed to demonstrate irreparable harm in the absence of injunctive relief. Plaintiffs retain the right to possess any weapons they lawfully possessed when the Act took effect. At most, the Act has led to a reduction in lawful sales by gun stores. But this type of

economic harm, which is compensable in readily calculable damages, cannot be the basis for a TRO. The motion should be denied for this additional reason.

BACKGROUND

Public Act 102-1116 became law on January 10, 2023. Governor JB Pritzker signed the Act shortly after its final passage by the General Assembly. Prior to transmitting the legislation to the Governor, both the Speaker of the Illinois House of Representatives and the President of the Illinois Senate signed the Act to certify the procedural requirements for passage had been met.

Although the Act became law on January 10, different provisions become operative at different times. Beginning January 10, the Act prohibits the sale, manufacture, delivery, or importation of “assault weapon[s]” and “large capacity ammunition feeding device[s]” (*i.e.*, large capacity magazines) in Illinois subject to certain exceptions for law enforcement, members of the military, and other professionals with similar firearms training and experience. *See generally* 720 ILCS 5/24-1.9 (new) & 1.10 (new). Individuals who lawfully possessed assault weapons and large capacity magazines covered by the Act as of the effective date can continue to possess them, although they must register their assault weapons with the Illinois State Police (“ISP”) by January 1, 2024 in order to continue lawfully possessing them after that date. *Id.* §§ 1.9(c)-(d) & 1.10(c)-(d).

Plaintiffs apparently filed this lawsuit challenging the Act on January 18, 2023, although Defendants have not been served. At 12:04 p.m. on January 17, Plaintiffs’ counsel emailed a non-file-stamped complaint and emergency motion for a temporary restraining order to two members of the Attorney General’s Office, and indicated that an emergency hearing had been set for 11:00 a.m. on January 18.

LEGAL STANDARD

Plaintiffs seek a TRO enjoining a duly enacted statute. Granting a preliminary injunction, such as a TRO, is “an extraordinary remedy” and courts “do not favor their issuance.” *Guns Save Life, Inc. v. Raoul*, 2019 IL App (4th) 190334, ¶ 36 (citation and internal quotation marks omitted). “The purpose of a preliminary injunction is to preserve the status quo pending a decision on the merits of a case.” *Hartlein v. Illinois Power Co.*, 151 Ill. 2d 142, 156 (1992). Use of this extraordinary remedy is only appropriate in “situations where an extreme emergency exists and serious harm would result if it is not issued.” *Id.*

To obtain preliminary injunctive relief, a party must show: “(1) a clearly ascertained right in need of protection, (2) irreparable injury in the absence of an injunction, (3) no adequate remedy at law, and (4) a likelihood of success on the merits of the case.” *Mohanty v. St. John Heart Clinic, S.C.*, 225 Ill. 2d 52, 62 (2006); accord *Guns Save Life*, 2019 IL App (4th) 190334, ¶ 37. The party seeking the injunction must raise a “fair question” that each of the elements is satisfied. *Guns Save Life*, 2019 IL App (4th) 190334, ¶ 37. Even if a party meets these elements, a court must still “balance the hardships and consider the public interests involved.” *Id.* (cleaned up). “If the circuit court finds that the harm to the public or to the opposing party outweighs the benefits of granting the injunction, it must deny the motion for a preliminary injunction, even if all of the other requirements for granting a preliminary injunction are met.” *JL Properties Grp. B, LLC v. Pritzker*, 2021 IL App (3d) 200305, ¶ 57 (collecting cases).

ARGUMENT

Plaintiffs’ TRO motion fails for two principal reasons: their claims are unlikely to succeed, and Plaintiffs will not suffer irreparable harm without a TRO.

I. Plaintiffs are unlikely to succeed on the merits of their claims.

A. Plaintiffs' single-subject challenge fails because the Act's provisions all relate to the regulation of firearms.

Plaintiffs are unlikely to succeed on their claim that the Act violates the single-subject clause in Article IV, section 8(d) of the Illinois Constitution. Plaintiffs focus their analysis on the wrong place: rather than looking at the bill as originally introduced, the Court must look at the face of the law that was actually passed. *See People v. Sypien*, 198 Ill. 2d 334, 339 (2001) (requiring review of “the act, on its face”). The face of the Act makes clear that each of its provisions relate to the regulation of firearms. The regulation of firearms is well within the “wide latitude” courts allow for a single subject, and each provision in the Act has a “natural and logical connection” to firearms regulation. *Johnson v. Edgar*, 176 Ill. 2d 499, 515 (1997); *accord Arangold Corp. v. Zehnder*, 187 Ill. 2d 341, 352 (1999). Plaintiffs' single-subject challenge will not succeed on the merits and cannot be the basis for a TRO.

The purpose of the “single subject rule” is “to prevent the combination of unrelated subjects in one bill to obtain support for the package as a whole, when the separate parts could not succeed on their individual merits.” *Kane Cnty. v. Carlson*, 116 Ill. 2d 186, 214 (1987). The rule “does not impose an onerous restriction on the legislature’s actions” but, to the contrary, “leaves the legislature with wide latitude in determining the content of bills.” *Johnson*, 176 Ill. 2d at 515. “[T]he legislature must indeed go very far to cross the line to a violation of the single subject rule.” *Id.* at 515–16. Thus, “courts have often upheld legislation involving comprehensive subjects.” *Cutinello v. Whitley*, 161 Ill. 2d 409, 424 (1994).

“A determination of whether a public act runs afoul of the single subject rule necessitates a two-step analysis.” *People v. Bocclair*, 202 Ill. 2d 89, 109 (2002). “First, [the court] must determine whether the act, on its face, involves a legitimate single subject.” *Sypien*, 198 Ill. 2d at

339. “[T]he term ‘subject’ is to be liberally construed in favor of upholding the legislation, and the subject may be as comprehensive as the legislature chooses.” *People v. Cervantes*, 189 Ill. 2d 80, 84 (1999). “Second, [the court] must discern whether the various provisions within an act all relate to the proper subject at issue.” *Sypien*, 198 Ill. 2d at 339. “What is dispositive [at this step] is whether the contents included within the enactment have a natural and logical connection to a single subject.” *Arangold*, 187 Ill. 2d at 352. The single subject rule does not impose any “additional requirement that the provisions within an enactment be related to each other.” *Id.* at 356.

The single-subject rule also does not impose any requirements regarding the legislation’s breadth. “Neither the length of an act nor the number of provisions in an act is determinative of its compliance with the single subject rule.” *Wirtz v. Quinn*, 2011 IL 111903, ¶ 15. “That the enactment happens to amend a number of acts already in effect is also not determinative.” *Arangold*, 187 Ill. 2d at 352.

The Act does not violate the single-subject clause because all of the Act’s provisions relate to the regulation of firearms. The core provisions of the Act limit the sale of a particularly dangerous class of firearms—assault weapons—and large capacity magazines that can be used to multiply a firearm’s lethality. The General Assembly enacted these provisions in response to the use of assault weapons and large capacity magazines in mass shootings in Illinois and throughout the country. By enacting restrictions on the sale of assault weapons and large capacity magazines, the General Assembly sought to reduce the prevalence of these weapons in Illinois because of their distinct ability to inflict catastrophic injury on large numbers of people in mere seconds—before law enforcement can respond.

The Act also includes registration requirements for existing owners of assault weapons requiring these weapons to be registered with the Illinois State Police by January 1, 2024. The registration requirements strike a careful balance between the property interest existing owners have in these weapons, and the need to ensure that law enforcement can track the current stock of assault weapons in circulation. The registration requirement helps law enforcement prevent these existing weapons from entering a black market or otherwise getting transferred to individuals intent on criminal activity like a mass shooting. In other words, the registration requirements facilitate enforcement of the sale restrictions, and likewise reduce the prevalence of and access to these potent weapons. In doing so, the registration requirements have a “natural and logical connection” to the regulation of firearms. *Arangold*, 187 Ill. 2d 341 at 352.

Plaintiffs attempt to cherry-pick other provisions in the Act to suggest that they violate the single-subject rule, but Plaintiffs fall far short of demonstrating any single-subject violation given the “wide latitude” the General Assembly has to define the scope of its enactments. *Johnson*, 176 Ill. 2d at 515. Plaintiffs reference four provisions in the Act (albeit without citation) as potential violations of the single subject rule, but none of them are.

First, Plaintiffs object to amendments giving a division of ISP authority to conduct “investigations of human trafficking, illegal drug trafficking, and illegal firearms trafficking,” and requiring ISP to “provide statewide coordination and strategy pertaining to firearm-related intelligence, firearms trafficking interdiction, and investigations reaching across all divisions of the Illinois State Police, including providing crime gun intelligence support” Compl. ¶ 42(a)); 20 ILCS 2605/2605-35(a)(7) & (c)(new). On their face, these provisions unambiguously relate to the regulation of firearms by empowering ISP to lead a coordinated response to illegal gun trafficking and firearms-related crimes throughout Illinois. Unsurprisingly, the amendments also

reference human and drug trafficking because those crimes are frequently perpetrated with firearms. It is no secret that international drug cartels and other criminal organizations have been known to use firearms to facilitate illegal trafficking in people, drugs, and guns. By ensuring a coordinated, state-wide response to firearm and related trafficking, these provisions give law enforcement critical tools to reduce illegal firearms in Illinois and to prevent criminal organizations from obtaining them. No Illinois court has ever read the single-subject clause in a way that would stop the General Assembly from grouping authority to combat firearms trafficking with authority to combat drug and human tracking. Doing so would vitiate the “wide latitude” to which the General Assembly is entitled. *Johnson*, 176 Ill. 2d at 515.

Second, Plaintiffs object to the inclusion of what they call amendments to the “law regarding the procurement of bids for certain services related to purchases of certain technology by the Illinois State Police,” Compl. ¶ 42(b). If Plaintiffs had included any citation to or quotation from these provisions, the connection to the regulation of firearms would be apparent. The “technology” in question is:

software, software licenses, or software maintenance agreements that support the efforts of the Illinois State Police to enforce, regulate, and administer the Firearm Owners Identification Card Act, the Firearm Concealed Carry Act, the Firearms Restraining Order Act, the Firearm Dealer License Certification Act, the Law Enforcement Agencies Data System (LEADS), the Uniform Crime Reporting Act, the Criminal Identification Act, the Uniform Conviction Information Act, and the Gun Trafficking Information Act, or establish or maintain record management systems necessary to conduct human trafficking investigations or other stolen firearm investigations.

30 ILCS 500/1-10(b)(21)(new). In other words, these provisions streamline the procurement process for ISP to purchase software to administrate the firearms regulations and licensing requirements that exist in Illinois. Better and more efficient software systems will enable ISP to carry out its critical responsibility of enabling law enforcement to distinguish between who is lawfully entitled to own a firearm and who is not. Given that convicted felons are frequently barred

from lawfully owning firearms, it is “natural and logical” for the General Assembly to have anticipated a necessary linkage between software databases reflecting firearm ownership eligibility, on the one hand, and criminal history, on the other. *Arangold*, 187 Ill. 2d at 352. Ensuring that people who have perpetrated violent felonies in the past cannot lawfully obtain firearms relates to the regulation of firearms.

Third, Plaintiffs object that the Act extends the time period for firearms restraining orders from six months to up to one year. Compl. ¶ 42(c); 430 ILCS 67/40 (amended). Firearms restraining orders allow law enforcement, family members, and intimate partners to seek an emergency court order prohibiting a person from possessing firearms when there is “clear and convincing evidence” that the person “poses an immediate and present danger of causing personal injury to himself, herself, or another” because of his or her access to firearms. 430 ILCS 67/35(f). Establishing a judicially administered process for taking firearms out of the hands of individuals who pose “immediate” danger to themselves or others is a valid regulation of who can possess a firearm. Likewise, giving judges greater latitude to fashion a restraining order of adequate duration promotes firearm safety by ensuring firearms are not prematurely returned to individuals who still pose an acute risk to themselves or others.

Fourth, Plaintiffs object that the Act “[c]reated new provisions in the law regarding the ban on certain semi-automatic weapons.” Compl. ¶ 42(d). Plaintiffs do not cite to any specific provision of the Act to support this objection. The references to “semiautomatic rifle[s],” and “semiautomatic pistol[s],” and “semiautomatic shotgun[s]” in the Act arise from the two-fold manner in which the Act defines an “assault weapon”. *See generally* 720 ILCS 5/24-1.9 (new) & 1.10 (new). In addition to classifying specific firearm models as “assault weapon[s]” subject to the Act’s sale restrictions and registration requirements, 720 ILCS 5/24-1.9(a)(1)(J)-(L), the Act also

identifies specific features that, when incorporated in a semiautomatic rifle, pistol, or shotgun, render that weapon an “assault weapon” for purposes of the Act, 720 ILCS 5/24-1.9(a)(1)(A)-(D), (F)-(G). These definitions reflect the General Assembly’s conclusions about particular weapon types and characteristics that are particularly lethal and dangerous. Plaintiffs may disagree with those conclusions, but that does not change the fact that the Act’s restrictions on what it classifies as “assault weapons” are sufficiently related to the regulation of firearms to survive a single-subject challenge.

Plaintiffs do not identify any other provisions in the Act that supposedly violate the single subject rule; instead, they offer broad critiques of the General Assembly’s use of “shell bills” and late-breaking amendments. *See, e.g.*, Compl. ¶¶ 37-44, 88-95. But the Illinois Supreme Court has not treated the single subject rule as a mechanism for probing the underlying legislative process preceding the enactment of a law. Instead, a court applying the single subject rule looks at “the act, on its face”—not prior versions of the bill as introduced or as it made its way through the legislative process. *Sypien*, 198 Ill. 2d at 339. As a result, Plaintiffs’ arguments about how the original content of House Bill 5471 pertained to insurance regulation are simply irrelevant. What matters is that the Act as ultimately approved, both as a whole and in its constituent parts, has a “natural and logical connection” to a single subject: the regulation of firearms. *Arangold*, 187 Ill. 2d at 352. Plaintiffs’ single-subject challenge to the Act will fail and cannot be the basis for a TRO.

B. The Illinois Supreme Court’s enrolled billed doctrine forecloses Plaintiffs’ challenge under the three-readings clause.

Plaintiffs allege in Count II that the Act failed to comply with the requirement that bills must “be read by title on three different days in each house.” Ill. Const. art. IV, § 8(d). This claim is foreclosed by Illinois Supreme Court precedent and the Constitution itself.

The “three readings requirement” in Article IV, section 8(d) of the Illinois Constitution is a procedural requirement intended to ensure legislators have adequate notice of pending legislation. *Geja’s Cafe v. Metro. Pier & Exposition Auth.*, 153 Ill. 2d 239, 258–60 (1992). The Constitution further provides: “The Speaker of the House of Representatives and the President of the Senate shall sign each bill that passes both houses to certify that the procedural requirements for passage have been met.” Ill. Const. art. IV, § 8(d). This is known as the “enrolled bill doctrine”; it “mean[s] that, upon certification by the Speaker and the Senate President, a bill is conclusively presumed to have met all procedural requirements for passage,” including the three-readings requirement. *Geja’s Cafe*, 153 Ill. 2d at 259.

The Illinois Supreme Court has consistently held that the enrolled bill doctrine forecloses all litigation challenging certified legislation for failure to comply with the three readings requirement. *Friends of Parks v. Chi. Park Dist.*, 203 Ill. 2d 312, 328–29 (2003) (“[W]e will not invalidate legislation on the basis of the three-readings requirement if the legislation has been certified.”); *People v. Dunigan*, 165 Ill. 2d 235, 251–54 (1995) (“Because the Act shows, on its face, that it was certified by the presiding officers of both houses, the enrolled-bill rule precludes this court from considering whether the legislature complied with the three-readings requirement set forth in article IV, section 8.”); *Cutinello*, 161 Ill. 2d at 424–25 (“the 1970 Constitutional Convention specifically contemplated the use of the enrolled bill doctrine to prevent the invalidation of legislation on technical or procedural grounds” and “determined that the legislature would police itself with respect to procedure”); *Geja’s Cafe*, 153 Ill. 2d at 258–60 (significant separation of powers problems would arise from judicial interference in legislative procedure); *Polich v. Chi. Sch. Fin. Auth.*, 79 Ill. 2d 188, 208–12 (1980) (“clear intent of the framers of the Constitution” was to foreclose litigation raising three readings challenge); *Fuehrmeyer v. City of*

Chicago, 57 Ill. 2d 193, 198 (1974) (“Whether or not a bill has been read by title, as the Constitution commands, seems fairly to be characterized as a procedural matter, the determination of which was deliberately left to the presiding officers of the two Houses of the General Assembly.”); *see also Doe v. Lyft, Inc.*, 2020 IL App (1st) 191328, ¶ 54 (three-readings claim foreclosed); *McGinley v. Madigan*, 366 Ill. App. 3d 974, 991–92 (1st Dist. 2006) (same); *New Heights Recovery & Power, LLC v. Bower*, 347 Ill. App. 3d 89, 100 (1st Dist. 2004) (same).

In this case, Plaintiffs do not and cannot dispute that the Speaker of the Illinois House of Representatives and the President of the Illinois Senate signed the Act to certify the procedural requirements for passage had been met. While Plaintiffs may question the propriety of that certification, they must address their concern to the General Assembly, not this Court. Through the enrolled bill doctrine, the Illinois Supreme Court has made clear that certification by the legislative leaders is conclusive for purposes of the three-readings requirement—a reviewing court cannot look past the face of that certification to probe the underlying legislative process. Plaintiffs’ three-readings challenge to the Act fails as a matter of binding precedent and cannot be the basis for a TRO.

C. Plaintiffs’ attempt to recycle their single-subject and three-readings challenges as a procedural due process claim fails as a matter of law.

Plaintiffs allege that they were deprived of procedural due process because they “were denied any meaningful opportunity to participate in the passage of HB 5471,” Compl. ¶ 83. According to Plaintiffs, this violation is based on “the complete and total failure of Defendants to comply with express constitutional procedural guarantees afforded the Plaintiffs under [the Illinois Constitution]” by the single-subject and three-readings clauses. Compl. ¶¶ 86, 100. This claim fails for multiple reasons. At the threshold, a constitutional claim cannot be based entirely on the failure to comply with *another* constitutional provision. *E.g., In re A.C.*, 2016 IL App (1st) 153047,

¶ 60 (“A constitutional challenge raised under one theory cannot be supported by decisional law based purely on another provision.”) (cleaned up). But that is precisely what Plaintiffs seek to do here: their procedural due process claim rests entirely on the General Assembly’s alleged failure to comply with the single-subject and three-readings clauses of the Illinois Constitution. Compl. ¶ 101.

Furthermore, Plaintiffs have not satisfied the procedural due process standard. “A procedural due process claim challenges the constitutionality of specific procedures used to deny a person's life, liberty or property.” *In re M.A.*, 2015 IL 118049, ¶ 35. “The fundamental requirements of due process are notice of the proceeding and an opportunity to present any objections.” *Id.* To assess a procedural due process violation, courts “examine (1) whether a life, liberty or property interest has been interfered with by the State; (2) the risk of erroneous deprivation of this interest under the current procedures and the value of additional safeguards; and (3) the administrative and financial burden additional procedures would have on the state's interest.” *In re A.C.*, 2016 IL App (1st) 153047, ¶ 61.

Here, Plaintiffs have failed to identify any life, liberty, or property interest that has been interfered with by Defendants. Plaintiffs have no such interest in the single-subject or three-readings clauses of the Illinois Constitution, and, even assuming they did, Illinois courts have recognized that the legislative process affords individuals any process that they would be due. *E.g., Illinois Collaboration on Youth v. Dimas*, 2017 IL App (1st) 162471, ¶ 87 (“[E]ven assuming plaintiffs had a property interest in receiving payments under their contracts, the legislative process of making appropriations provides them with all the process they are due.”); *Cheetah Enterprises, Inc. v. Lake Cnty.*, 22 Ill. App. 3d 306, 314 (1974) (“Procedural due process provides safeguards to persons whose property or other rights may be deprived pursuant to powers conferred by general

acts of government; it does not apply to actions which are political in their nature and which lie within the legislative province.”).

Finally, courts have rejected attempts to base due process claims on an alleged infringement of the right to bear arms, as Plaintiffs do here. Compl. ¶ 84; *e.g.*, *Culp v. Raoul*, 921 F.3d 646, 658 (7th Cir. 2019) (“without any authority for their proposition that the Due Process Clause independently confers a right to carry a concealed firearm in Illinois, the plaintiffs cannot show that they have been deprived of a liberty interest without due process”). Plaintiffs are unlikely to succeed in their attempt to use a procedural due process claim to repackage their already-deficient single-subject and three-readings objections.

D. Plaintiffs’ equal protection challenge fails because the Act’s exceptions draw a rational distinction based on military and law enforcement training and experience.

In Count IV, Plaintiffs challenge the Act on equal protection grounds because it includes exceptions to the limitations on the purchase and sale of assault weapons and large capacity magazines for certain categories of current and retired professionals, such as law enforcement and members of the military. Count IV is unlikely to succeed for multiple reasons: Plaintiffs have not shown that they are similarly situated to the comparison group, *i.e.*, the professionals who remain eligible to purchase assault weapons and large capacity magazines; the Act does not implicate a fundamental right under the Illinois Constitution or a protected class; and the exceptions are supported by a rational basis because the covered professionals have greater training and experience with firearms than the public at large.

The equal protection clause of the Illinois Constitution “guarantees that similarly situated individuals will be treated in a similar fashion unless the government can demonstrate an appropriate reason to treat them differently.” *In re Destiny P.*, 2017 IL 120796, ¶ 14; *see* Ill. Const. art. I, § 2. “The equal protection clause does not forbid the legislature from drawing proper

distinctions between different categories of people, but it does prohibit the government from doing so on the basis of criteria wholly unrelated to the legislation's purpose.” *Destiny P.*, 2017 IL 120796, ¶ 14. When evaluating an equal protection claim, the court first considers as a threshold matter “whether the individual is similarly situated to the comparison group.” *Id.* ¶ 15. This is because it does not violate equal protection to treat *different* groups differently. *Id.* Whether groups are similar is not determined in the abstract; rather, “the court must consider the purpose of the particular legislation.” *Id.* “Two classes are similarly situated only when they are in *all* relevant respects alike.” *Id.* (emphasis added).

Here, plaintiffs are unlikely to succeed on their equal protection claim because they have not even attempted to explain how they are similarly situated to the individuals who are permitted, by virtue of their professions, to continue purchasing assault weapons and large capacity magazines. Nor are they: the professions identified in the Act are professions that necessarily entail substantial firearms training, including on how to safely handle and store assault weapons. Indeed, numerous courts that have evaluated challenges to similar statutes under the federal Equal Protection Clause have recognized that law enforcement officers and those in similar professions “are not similarly situated to the general public with respect to the assault weapons and large-capacity magazines banned by the [relevant state law].” *Kolbe v. Hogan*, 849 F.3d 114, 147 (4th Cir. 2017) (en banc), *abrogated in part on other grounds by New York State Rifle & Pistol Ass’n, Inc. v. Bruen*, 142 S. Ct. 2111 (2022); *see Shew v. Malloy*, 994 F. Supp. 2d 234, 252 (D. Conn. 2014), *aff’d in relevant part, rev’d in part sub nom. New York State Rifle & Pistol Ass’n, Inc. v. Cuomo*, 804 F.3d 242 (2d Cir. 2015) (“The charge of protecting the public, and the training that accompanies that charge, is what differentiates the exempted personnel from the rest of the population.”). Allowing those in the enumerated professions to continue to purchase assault

weapons and large capacity magazines, therefore, is consistent with the Act's purpose of promoting public safety. See *Destiny P.*, 2017 IL 120796, ¶ 18 (“[T]he similarly situated determination must be made in light of the purposes of the statutes at issue.”).

Even if plaintiffs could establish that they were similarly situated to those in the enumerated professions, yet treated differently, their equal protection claim would still not succeed. Critically, Plaintiffs are incorrect that the Act is subject to strict scrutiny. Compl. ¶¶ 133-40. Claims under the Equal Protection Clause of the Illinois Constitution are evaluated under strict scrutiny only if they are “suspect” classifications, such as those based on race, or if they impair “fundamental” rights. *People v. Shephard*, 152 Ill. 2d 489, 499 (1992). Other classifications are subject to “rational basis scrutiny,” which asks whether “the challenged classification bears a rational relationship to a legitimate governmental purpose.” *Destiny P.*, 2017 IL 120796, ¶ 14. “This review is limited and deferential, and the legislation will not be held to violate the equal protection clause if any set of facts can rationally be conceived to justify the classification.” *Id.*

Plaintiffs do not identify a relevant “suspect” classification, though they do claim impairment of a fundamental right, specifically, the right to bear arms. The problem for Plaintiffs, however, is that the Illinois Supreme Court has indicated that the right to bear arms is not fundamental under the Illinois Constitution. *Kalodimos v. Vill. of Morton Grove*, 103 Ill. 2d 483, 509 (1984) (“[T]he right to arms secured by the Illinois Constitution, which did not exist prior to 1970, is subject, as we have explained, to substantial infringement in the exercise of the police power.”). In *Kalodimos*, The Illinois Supreme Court explained that the Illinois right to bear arms, unlike the federal right, omits any reference to “the militia” and explicitly recognizes “‘the police power’ as a limitation on the liberty the provision affords.” *Id.* at 491. The Illinois Supreme Court’s

different characterization of the right to bear arms means that it is not a “fundamental right” for purposes of equal protection analysis and, as such, the Act need only satisfy rational basis review.¹

The Act easily survives rational basis review because it has a reasonable relationship to a legitimate government purpose. Reducing firearms deaths and mass shooting casualties are clearly legitimate government purposes. *See Kalodimos*, 103 Ill. 2d at 510; *see also Hunt v. Daley*, 286 Ill. App. 3d 766, 771 (1997). And prohibiting the future acquisition of the particular firearms and magazines that are most likely to result in a mass shooting—except for those in particular professions related to public safety—is a reasonable way to achieve that goal. The limited exceptions in the Act do not change this outcome, because they reasonably differentiate between professionals with extensive firearms training and experience and the public at large. Plaintiffs’ equal protection claim is unlikely to succeed on the merits and thus cannot be the basis for a TRO.

II. Plaintiffs have not shown they will suffer irreparable harm without a TRO.

Plaintiffs have not met their burden of showing that they will suffer irreparable harm in the absence of a TRO. Plaintiffs make a conclusory assertion that they are “being immediately and irreparably harmed each and every day they continue to be subjected to [the Act] and these harms are a continuing transgression against their fundamental right to bear arms.” TRO Mot. ¶ 3. But this assertion fundamentally misunderstands what the Act has and has not done at this point. To the extent Plaintiffs lawfully possessed assault weapons or large capacity magazines before the

¹ Even if there were a fundamental right at issue under either the state or federal constitution (which, as explained, there is not), the challenged regulations do not infringe upon that right. *See, e.g., Friedman v. City of Highland Park, Ill.*, 784 F.3d 406, 408 (7th Cir. 2015); *Oregon Firearms Fed’n, Inc. v. Brown*, 2022 U.S. Dist. Lexis 219391, No. 2:22-cv-1815 (D. Or. Dec. 6, 2022). Thus, rational basis review would still apply to Plaintiffs’ equal protection claim. *See People v. Mosley*, 2015 IL 115872, ¶ 41 (when firearm regulation fell outside Second Amendment, rational basis applied to equal protection claim).

Act took effect, they still have the lawful right to possess them. As such, the Act has not impacted Plaintiffs' right to "*bear arms*" at all at this point.

Since the Act took effect, what has changed is that there are fewer people in Illinois who can lawfully purchase "assault weapon[s]" and "large capacity ammunition feeding device[s]" as defined in the Act. At most, these limitations on buying and selling certain types of weapons and accessories may reduce sales at gun stores. But irreparable harm exists only when "monetary damages cannot adequately compensate the injury and the injury cannot be measured by pecuniary standards." *Happy R Sec., LLC v. Agri-Sources, LLC*, 2013 IL App (3d) 120509, ¶ 36 (cleaned up). A court cannot grant a preliminary injunction when the harm at issue "can be compensated adequately by monetary damages calculable with a reasonable degree of certainty." *Ajax Eng'g Corp. v. Sentry Ins.*, 143 Ill. App. 3d 81, 84 (5th Dist. 1986).

The first group of Plaintiffs identified in the complaint appear to be gun stores based on their corporate status and names. Critically, these gun stores remain free to sell the assault weapons and large capacity magazines in their inventory to multiple customers, such as current and retired law enforcement, members of the military, and veterans. While it is true that there are now fewer potential customers for this inventory, whatever reduction in overall sales these gun stores may experience can be recouped through a successful claim for damages—the quintessential remedy at law. These alleged damages would be readily calculable through a comparison of sales prior to and after the Act's effective date. Thus, the only potentially cognizable harm attributable to the Act at this point—a reduction in sales of assault weapons and high capacity magazines—is not irreparable.

The individual Plaintiffs identified in the complaint face even less prospect of harm in the absence of a TRO. They can continue to possess any assault weapons and large capacity magazines

they lawfully possessed at the time the Act took effect; they need only register their assault weapons and large capacity magazines with the ISP at some point before January 1, 2024. A registration requirement that is not enforceable until a year from now does not translate into irreparable harm today, if ever.

Similarly, the inability to purchase more assault weapons and large capacity magazines is also not an impairment of Plaintiffs' right to bear arms. Plaintiffs do not bring a Second Amendment challenge, but even if they did, the right to bear arms does not provide "a right to keep and carry any weapon whatsoever in any manner whatsoever and for whatever purpose." *District of Columbia v. Heller*, 554 U.S. 570, 626 (2008). The selection of particular arms is not part of the right to bear arms. *See e.g. Pena v. Lindley*, 2015 WL 854684, at *12 (E.D. Cal. Feb. 26, 2015), *aff'd*, 898 F.3d 969 (9th Cir. 2018). The individual Plaintiffs can still bear arms, just not these particular arms, if they do not already possess them. That is not an infringement of their rights and, as a result, not a source of irreparable harm.

Neither category of plaintiffs—the gun stores or the individuals—has demonstrated irreparable harm and their TRO motion must be denied for this additional reason.

CONCLUSION

For the foregoing reasons, the Court should deny Plaintiffs' motion for a TRO.

Dated: January 18, 2023

Respectfully submitted,

GOVERNOR JB PRITZKER
ATTORNEY GENERAL KWAME RAOUL

By: /s/Christopher G. Wells

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Governor JB Pritzker*

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Kirk Allen, by and through his attorneys, Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. On or about August 14, 2023, I submitted a Freedom of Information request to the Illinois Department of Corrections. (A true and accurate copy of my request is attached herein as Exhibit A)
3. On or about August 28, 2023, I received a response from Ms. Maggie Meikle, the Freedom of Information Officer for the Illinois Department of Corrections.
4. In response to my request, the Illinois Department of Corrections provided, *inter alia*, the following:
 - a. A cover letter
 - b. A word document listing the names, locations and appointment date of each state employee.
 - c. A batch of training records for all persons the Illinois Department of Corrections identified as prison wardens.

5. Attached as Exhibit B is a true and accurate copy of the cover letter provided to me in response to my freedom of information request by the Illinois Department of Corrections.
6. Attached as Exhibit C is a true and accurate copy of the word document provided to me in response to my freedom of information request by the Illinois Department of Corrections listing the names, locations and appointment date of each relevant state employee.
7. Attached as Exhibit D is a true and accurate copy of the batch of training records provided to me in response to my freedom of information request by the Illinois Department of Corrections for all state employees which the Illinois Department of Corrections identified as Prison Warden.
8. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Kirk Allen
KIRK ALLEN

Thomas G. DeVore
IL Bar No. 06305737
silver lake group, ltd.
118 N. 2nd St.
Greenville, IL 62246
Telephone - 618-664-9439
Facsimile 618-664-9486
tom@silverlakelaw.com

Subject: FOIA Request

Date: Monday, August 14, 2023 at 1:43:03 PM Central Daylight Time

From: Kirk Allen

To: DOC.FOIARequest

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

1. Copy of all firearms training certifications held by Wardens, superintendents, and keepers of prisons In Illinois since February 10, 2023.
2. Copy of all records that indicate the appointments of the current Wardens, Superintendents, and keepers of prisons in Illinois. I am seeking the names and dates of such appointments.

I qualify as both media and non-profit under the definitions in Section 2 (c-10) ("Commercial purpose"), Section 2 (f) ("News media"), Section 2 (g) ("Recurrent requester"), and Section 2 (h) ("Voluminous request") of the Freedom of Information Act, for the purposes of being exempt to the provisions of Section 3.1 (Requests or commercial purposes), Section 3.2 (Recurrent requesters), Section 3.6 (Voluminous requests), and Section 6 (Authority to charge fees).

I request expedited processing on the basis of urgency to inform the citizens and taxpayers of Illinois about their government's activities. If any element of this request is denied in whole or in part, I ask that you justify all withholdings individually by reference to specific exemptions of the Act. Please provide all responsive information to me electronically.

I request a rolling production of records, such that the public body furnishes records to my attention as soon as they are identified, preferably electronically, but as needed then to my attention, at the below address. If you have any questions please do not hesitate to contact me. Rolling production is not to be perceived as an agreement to extend the time frame for compliance under FOIA.

If you are not the FOIA officer responsible for any part of this request you are required by law to forward it to the appropriate FOIA officer.

The purpose of the request is to access and disseminate information regarding the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

As outlined in FOIA, documents shall be furnished without charge or at a reduced charge, as determined by the public body, if the person requesting the documents states the specific purpose for the request and indicates that a waiver or reduction of the fee is in the public interest. Waiver or reduction of the fee is in the public interest if the principal purpose of the request is to access and disseminate information regarding the health, safety and welfare or the legal rights of the general public and is not for the principal purpose of personal or commercial benefit.

I am requesting the records be provided in electronic format if that is the method in which they are stored. If they are in paper form and the copier can convert them to electronic format I would

appreciate receiving them electronically.

Thanks,

Kirk Allen

Edgar County Watchdogs

PO Box 593

Kansas, IL 61933



The Illinois Department of Corrections

1301 Concordia Court, P.O. Box 19277 • Springfield, IL 62794-9277 • (217) 558-2200 TDD: (800) 526-0844

August 28, 2023

Kirk Allen
Kirk@illinoisleaks.com

Re: Freedom of Information Request #230814203

This letter is in response to your request to the Illinois Department of Corrections ("IDOC") pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1, et seq.

You have submitted the following request:

In accordance with the Freedom of Information Act of Illinois, I am requesting the following public records.

1. Copy of all firearms training certifications held by Wardens, superintendents, and keepers of prisons in Illinois since February 10, 2023.

Response: Responsive records are enclosed. Personal information has been redacted pursuant to Section 7(1)(b) of the Freedom of Information Act which exempts the release of "Private information, unless disclosure is required by another provision of this Act, a State or federal law or a court order."

2. Copy of all records that indicate the appointments of the current Wardens, Superintendents, and keepers of prisons in Illinois. I am seeking the names and dates of such appointments.

Response: Responsive records are enclosed.

You have a right to have the denial of your request reviewed by the Public Access Counselor (PAC) at the Office of the Illinois Attorney General. 5 ILCS 140/9.5(a). You can file your request for review with the PAC to:

Public Access Counselor
Office of the Attorney General
500 South 2nd Street
Springfield, Illinois 62706

Mission: To serve justice in Illinois and increase public safety by promoting positive change for those in custody, operating successful reentry programs, and reducing victimization.

www.illinois.gov/idoc

EXHIBIT B

You also have the right to seek judicial review of your denial by filing a lawsuit in the state circuit court, pursuant to 5 ILCS 140/11.

If you choose to file a request for review with the PAC, you must do so within 60 calendar days of the date of this denial letter (5 ILCS 140/9.5(a)). Please note that you must include a copy of your original FOIA request and this denial letter when filing a request for review with the PAC.

Sincerely,
Maggie Meikle
Freedom of Information Officer

Region 1

Dixon:

Tarry Williams 2/1/22

Arthur Manzano 5/1/23

Andrea Tack 1/16/20

East Moline:

John Varga 4/1/23

Hill:

Tyrone Baker 4/1/23

Mark Williams 6/16/21

Joliet TC:

Dr. Catherine Larry 2/16/20

Ryan Woods 6/16/21

Kewanee LSRC:

James Carothers, Jr 4/1/23

Chance Jones 11/16/22

Sheridan CC:

Kenneth Osborne 8/16/23

Donald Terry 2/1/21

Candice Riles-Daniels 1/1/23

Stateville:

Charles Truitt 6/16/22

Gary Benson 7/17/23

Jean Case 8/16/23

Darwin Williams 8/16/17

Region 2

Centralia:

Daniel Monti 8/1/22

Graham:

Steven Campbell 9/16/22

Oluyemisi Arogundade 6/16/21

Illinois River:

Cherryle Hinthorne 3/16/20

Jacksonville:

Harolletta Givens 10/1/21

Krystal Wooldridge 5/16/23

Lincoln:

Tionna Farrington 3/16/22

Natasha Dillard 1/6/23

Menard:

Anthony Wills 4/1/21

Kevin Reichert 5/1/21

Frank Lawrence 4/1/17

Pinckneyville:

David Mitchell 2/16/21

Jamie Karales 5/1/23

Christel Crow 2/16/21

Southwestern:

Kristy Wuest 10/16/22

Vonetta Harris 11/1/22

Western IL:

Brittany Greene 1/16/21

Tara Goins 2/16/23

Region 3

Big Muddy River:

Kimberly Hvarre 8/16/21

Danville:

Felecia Adkins 5/1/22

McKenna Allision 5/1/23

Lawrence:

Deana Brookhart 7/16/20

Chad Jennings 6/16/20

Jeremiah Brown 5/1/23

Pontiac:

Mindi Nurse 3/1/23

Katrina Joiner 9/16/23

Robinson:

William Loy 3/1/22

Shawnee:

Darren Galloway 8/1/22

Lu Walker 3/1/22

Taylorville:

Melinda Eddy 1/16/21

Joshua McDannald 11/16/22

Richard Stempinski 2/16/21

Vandalia

Vernon Dewitt 8/1/22

Leanna Williams 8/1/22

Vienna:

John Barwick, III 4/1/17

Laura Long 4/1/21

Women's Division:

Decatur:

Amanda Williams 2/1/22

Logan:

Danielle Mitchell 6/16/23

Michael Long 6/16/22

ATC:

Peoria: Laverne Clemons 6/1/16

Fox Valley: Margarita Mendoza 11/16/12 (Acting Chief of Women's Division)

Field Operations Firearms Qualification Range Score Sheet

Adkins, Felicia P. Robinson CC. 1
 Shooter's Name (Last, First, MI) Range Location Shooter #

F [REDACTED]
 Gender Height Weight Hair Color Eye Color DOB Driver's License #

Danville CC. 392 [REDACTED] 3-5-2025
 Office Badge # FOID # FOID Exp. Date

Weapon: Glock 19 .9mm 4.0 BNCC460
 Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: Jason G. [Signature] on 9/12/2022
 Firearms Range Instructor Signature Date of Inspection

Qualification

1 st Attempt – 30 Rounds	1 st Practice – 30 Rounds	3 rd Practice – 30 Rounds		
# of hits <u>29</u> = <u>96</u> %	# of hits _____ = _____ %	# of hits _____ = _____ %		
☒ Qualified ☐ Not Qualified <u>Jason G. [Signature]</u> <u>9/12/22</u> Range Instructor's Signature Date <u>JASON G. [Signature]</u> <u>Anticipation of Recal</u> <u>Good safe shooter</u>	Range Instructor's Signature _____ Date _____ _____ _____ _____	Range Instructor's Signature _____ Date _____ _____ _____ _____		
	<th>2nd Practice – 30 Rounds</th> <td> <th>2nd Attempt – 30 Rounds</th> </td>	2 nd Practice – 30 Rounds	<th>2nd Attempt – 30 Rounds</th>	2 nd Attempt – 30 Rounds
	# of hits _____ = _____ %	# of hits _____ = _____ %		
	☐ Qualified ☐ Not Qualified Range Instructor's Signature _____ Date _____ _____ _____ _____	☐ Qualified ☐ Not Qualified Range Instructor's Signature _____ Date _____ _____ _____ _____		

During the qualification on this date, 9/12/2022, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

Felicia Adkins 9-12-22 Jason G. [Signature] 9/12/2022
 Shooter's Signature Date Range Instructor's Signature Date
Felicia Adkins JASON G. [Signature]

ILLINOIS DEPARTMENT OF CORRECTIONS
Field Operations Firearms Qualification Range Score Sheet

Name: Felicia Adkins

Practice

Shooter # 1

Weapon Familiarization – 50 Rounds	
# of hits <u>50</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9/12/2022</u>

Good safe shooter
(Recall) Small amount of Anticipation

Course of Fire – 30 Rounds (Untimed)	
# of hits <u>29</u> = <u>96</u> %	Instructor's Initials: <u>JK</u> Date: <u>9/13/2022</u>

Anticipation of Recall

Course of Fire – 30 Rounds (Untimed)	
# of hits <u>29</u> = <u>96</u> %	Instructor's Initials: <u>JK</u> Date: <u>9/13/2022</u>

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9-13-22</u>

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9-13-22</u>

Malfunction / Body Armor Drills – 50 Rounds	
# of hits <u>50</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9-13-22</u>

Malfunction Drills

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9-14-22</u>

Anticipation of Recall

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9-14-22</u>

Good safe shooter

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>28</u> = <u>93</u> %	Instructor's Initials: <u>JK</u> Date: <u>9-14-22</u>

jacking trigger

Malfunction / Body Armor Drills – 50 Rounds	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9-14-22</u>

Malfunction Drills

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9-14-22</u>

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9-15-22</u>

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9-15-22</u>

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9/15/22</u>

Good safe shooter

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9/15/22</u>

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JK</u> Date: <u>9/15/22</u>

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>29</u> = <u>96</u> %	Instructor's Initials: <u>JK</u> Date: <u>9/15/22</u>

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>29</u> = <u>96</u> %	Instructor's Initials: <u>JK</u> Date: <u>9/15/22</u>

Shooter's Signature: [Signature] Date: 9/12/2022
Distribution: Training File

Range Instructor's Signature: [Signature] Date: 9/12/2022
DOC 0514 (Rev. 8/2019)

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

1. No employee who has been convicted of a crime of domestic violence in accordance with Administrative Directive 03.02.108 or who has a current order of protection against him or her that prohibits possession or use of firearms or who has been an inpatient in a mental facility within the past 5 years, may possess, transport or receive a weapon or ammunition.
2. All firearms training shall be properly and adequately supervised by trained Firearms Range Instructors. All safety precautions shall be adhered to and enforced.
3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall **NOT** be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
5. No action shall be taken on the firing range without the prior command of the Firearms Range Instructor. A command shall **NEVER** be anticipated. Firing shall only be on the command of the Firearms Range Instructor.
6. Every weapon shall be treated as though it were loaded.
7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded **ONLY** when instructed by the Firearms Range Instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
11. All handguns shall be strapped in at all times, except while in the process of drawing and firing.
12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
16. A weapon shall never be fired after a squib round (firearm malfunction in which a fired projectile does not have enough force behind it to exit the barrel) without first contacting a Firearms Range Instructor who shall unload and check the barrel for obstructions.
17. Never move in front of the line of fire until the firing line has been cleared and the commands "go forward" or "the line is clear" has been given.
18. Dry firing on the range shall be supervised by a Firearms Range Instructor.
19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Felicia Adkins
Employee's Printed Name

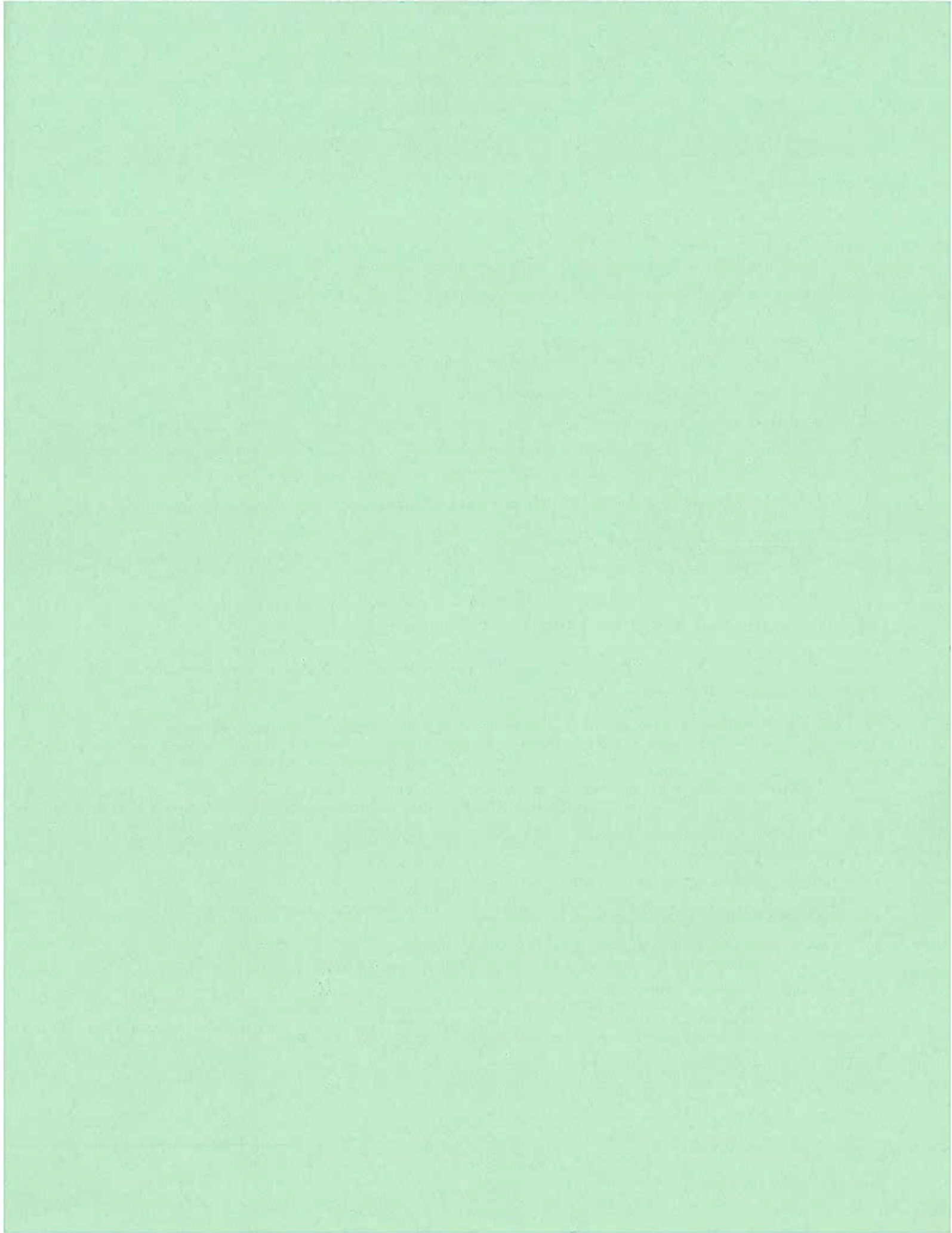
Felicia Adkins
Employee's Signature

9-12-22
Date

JASON GUNOER
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

9/12/2022
Date



ILLINOIS DEPARTMENT OF CORRECTIONS

Field Operations Firearms Qualification Range Score Sheet

Baker, Tyrone L Hill CC 4
 Shooter's Name (Last, First, MI) Range Location Shooter #

M 6'2" [REDACTED]
 Gender Height Weight

189 [REDACTED] 4-14-2030
 Hair Color Eye Color DOB

[REDACTED] [REDACTED] [REDACTED]
 Office Badge # FOID # FOID Exp. Date

Weapon: Glock 19 9mm 4 BH06099
 Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: [Signature] VorKamm on 5-5-23
 Firearms Range Instructor Signature Date of Inspection

Qualification

1st Attempt - 30 Rounds

of hits 30 = 100 %

☒ Qualified ☐ Not Qualified

[Signature] VorKamm 5-5-23
 Range Instructor's Signature Date

Jerky trigger

1st Practice - 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

3rd Practice - 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

2nd Practice - 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

2nd Attempt - 30 Rounds

of hits _____ = _____ %

☐ Qualified ☐ Not Qualified

Range Instructor's Signature _____ Date _____

During the qualification on this date, 5-5-2023, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

[Signature] 5-5-2023 [Signature] VorKamm 5-5-23
 Shooter's Signature Date Range Instructor's Signature Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Field Operations Firearms Qualification Range Score Sheet

Name:

Baker, Tyrone

Practice

Shooter #

4

Weapon Familiarization - 50 Rounds	
# of hits <u>50</u> = <u>100</u> %	Instructor's Initials: <u>RV</u>
<u>Anticipation of</u>	Date: <u>5-2-23</u>
<u>Recoil Jerky trigger</u>	

Course of Fire - 30 Rounds (Untimed)	
# of hits <u>27</u> = <u>90</u> %	Instructor's Initials: <u>RV</u>
<u>Anticipation, Jerky trigger</u>	Date: <u>5-2-23</u>

Course of Fire - 30 Rounds (Untimed)	
# of hits <u>27</u> = <u>90</u> %	Instructor's Initials: <u>RV</u>
<u>Jerky trigger</u>	Date: <u>5-2-23</u>

Field Operations Course - 30 Rounds (Timed)	
# of hits <u>27</u> = <u>90</u> %	Instructor's Initials: <u>RV</u>
<u>Anticipation, Jerky trigger</u>	Date: <u>5-2-23</u>

Malfunction/Body Armor Drills - 50 Rounds	
# of hits <u>50</u> = <u>100</u> %	Instructor's Initials: <u>RV</u>
<u>Completed class 1, 2, 3 Adapters</u>	Date: <u>5-2-23</u>

Field Operations Course - 30 Rounds (Timed)	
# of hits <u>27</u> = <u>90</u> %	Instructor's Initials: <u>RV</u>
<u>Jerky trigger</u>	Date: <u>5-2-23</u>

Field Operations Course - 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>RV</u>
<u>Tray round used</u>	Date: <u>5-3-23</u>

Shooter's Signature

Date

5-1-2023

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Page 2 of 2

Field Operations Course - 30 Rounds (Timed)	
# of hits <u>29</u> = <u>96</u> %	Instructor's Initials: <u>RV</u>
<u>Tray rounds used</u>	Date: <u>5-3-23</u>

Malfunction/Body Armor Drills - 50 Rounds	
# of hits <u>50</u> = <u>100</u> %	Instructor's Initials: <u>RV</u>
<u>Completed class 1, 2, 3 Adapters</u>	Date: <u>5-3-23</u>

Field Operations Course - 30 Rounds (Timed)	
# of hits <u>27</u> = <u>90</u> %	Instructor's Initials: <u>RV</u>
<u>Jerky trigger</u>	Date: <u>5-3-23</u>

Field Operations Course - 30 Rounds (Timed)	
# of hits <u>28</u> = <u>93</u> %	Instructor's Initials: <u>RV</u>
<u>Jerky trigger</u>	Date: <u>5-4-23</u>

Field Operations Course - 30 Rounds (Timed)	
# of hits <u>24</u> = <u>80</u> %	Instructor's Initials: <u>RV</u>
<u>Anticipation of Recoil, Jerky trigger</u>	Date: <u>5-4-23</u>

Field Operations Course - 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>RV</u>
<u>Anticipation of Recoil, Jerky trigger</u>	Date: <u>5-4-23</u>

Field Operations Course - 30 Rounds (Timed)	
# of hits <u>28</u> = <u>93</u> %	Instructor's Initials: <u>RV</u>
<u>Jerky trigger</u>	Date: <u>5-5-23</u>

Range Instructor's Signature

Date

R. VanKam5-1-23

DOC 0514 (Rev. 8/2019)

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

1. No employee who has been convicted of a crime of domestic violence in accordance with Administrative Directive 03.02.108 or who has a current order of protection against him or her that prohibits possession or use of firearms or who has been an inpatient in a mental facility within the past 5 years, may possess, transport or receive a weapon or ammunition.
2. All firearms training shall be properly and adequately supervised by trained Firearms Range instructors. All safety precautions shall be adhered to and enforced.
3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall NOT be permitted on the firing line between shooters except when addressed by the Firearms Range instructors.
5. No action shall be taken on the firing range without the prior command of the Firearms Range instructor. A command shall NEVER be anticipated. Firing shall only be on the command of the Firearms Range instructor.
6. Every weapon shall be treated as though it were loaded.
7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded ONLY when instructed by the Firearms Range instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
11. All handguns shall be strapped in at all times, except while in the process of drawing and firing.
12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range instructor of the malfunction.
16. A weapon shall never be fired after a squib round (firearm malfunction in which a fired projectile does not have enough force behind it to exit the barrel) without first contacting a Firearms Range instructor who shall unload and check the barrel for obstructions.
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18. Dry firing on the range shall be supervised by a Firearms Range instructor.
19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Lynne Baker
Employee's Printed Name

[Signature]
Employee's Signature

5-1-23
Date

[Signature]
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

5-1-23
Date

Distribution: Employee's Training File

Printed on Recycled Paper

ILLINOIS DEPARTMENT OF CORRECTIONS

Board Certified Firearms Qualification Range Score Sheet

BARWICK, JOHN, M. VIENNA Shooter's Name (Last, First MI) Range Location Shooter #

MALE [REDACTED] Height Weight Hair Color Eye Color DOB Driver's License #

WARDEN - VIENNA 334 [REDACTED] N/A Office Badge # FOID # FOID Exp. Date

Weapon: Glock 19 9mm 4" BNCD 415
Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: [Signature] on 2-27-2023
Firearms Range Instructor Signature Date of Inspection

Qualification

1 st Attempt – 30 Rounds	1 st Practice – 30 Rounds	3 rd Practice – 30 Rounds
# of hits <u>30</u> = <u>100</u> %	# of hits _____ = _____ %	# of hits _____ = _____ %
☒ Qualified ☐ Not Qualified		
<u>[Signature]</u> <u>3-2-23</u> Range Instructor's Signature Date	Range Instructor's Signature _____ Date _____	Range Instructor's Signature _____ Date _____
<u>excellent safe shooter</u>		

2 nd Practice – 30 Rounds	2 nd Attempt – 30 Rounds
# of hits _____ = _____ %	# of hits _____ = _____ %
	☐ Qualified ☐ Not Qualified
Range Instructor's Signature _____ Date _____	Range Instructor's Signature _____ Date _____

During the qualification on this date, 2-27-2023, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

[Signature] 2/27/23 [Signature] 2-27-23
Shooter's Signature Date Range Instructor's Signature Date

Board Certified Firearms Qualification Range Score Sheet

Name: BARWICK, John

Practice

Shooter # _____

Weapon Familiarization – 50 Rounds

of hits 50 = 100 %Instructor's Initials: JBDate: 2-28-23Inconsistent grip/good safe shooter
JB

Course of Fire – 30 Rounds (Untimed)

of hits 30 = 100 %Instructor's Initials: JBDate: 2-28-23Good safe shooter; needs to
smooth up mag exchange JB

Course of Fire – 30 Rounds (Untimed)

of hits 30 = 100 %Instructor's Initials: JBDate: 2-28-23Improving on mag exchange
Good shooter JB

Board Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JBDate: 2-28-23Good shooter / inconsistent
grip JB

Malfunction / Body Armor Drills – 50 Rounds

of hits 50 = 100 %Instructor's Initials: JBDate: 2-28-23Needs to work on reestablishing
his grip after class 1, 2 & 3 Malfunctions

Board Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JBDate: 2-28-23Slow down; Good shooter JB

Board Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: JBDate: 2-28-23Slow down JB

Board Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JBDate: 2-28-23Good shooter; Improving on
mag exchanges JB

Malfunction / Body Armor Drills – 50 Rounds

of hits 50 = 100 %Instructor's Initials: JBDate: 3-1-23Malfunctions clearing class
1, 2 & 3, Body Armour, S&L & Harris & Chapman
techniques

Board Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JBDate: 3-1-23Good shooter JB

Board Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JBDate: 3-1-23Good shooter JB

Board Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JBDate: 3-1-23Good shooter JB

Board Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JBDate: 3-1-23Good safe shooter

Board Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JBDate: 3-2-23excellent safe shooter

John Barwick
Shooter's Signature
Distribution: Training File

2/27/23
Date

Printed on Recycled Paper

John Barwick
Range Instructor's Signature

2-27-2023
Date

DOC 0514 (Eff. 2/2017)

Firearms Range Rules

1. No employee who has been convicted of a crime of domestic violence in accordance with Administrative Directive 03.02.108 or who has a current order of protection against him or her that prohibits possession or use of firearms or who has been an inpatient in a mental facility within the past 5 years may possess, transport or receive a weapon or ammunition.
2. All firearms training shall be properly and adequately supervised by trained Firearms Range Instructors. All safety precautions shall be adhered to and enforced.
3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall NOT be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
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7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
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13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 30 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
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19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

BARWICK, John
Employee's Printed Name

[Signature]
Employee's Signature

2/27/23
Date

Butler, Jonah 8739
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

2-27-2023
Date

Field Operations Firearms Requalification Range Score Sheet

Shooter's Name (Last, First, MI) Brockhart DeAnna M Range Location Robinson Shooter # [REDACTED]

Gender F Height [REDACTED] Weight [REDACTED] Hair Color [REDACTED] Eye Color [REDACTED] DOB [REDACTED] Driver's License # [REDACTED]

Office Lawrence Badge # 363 FOID # [REDACTED] FOID Exp. Date 7-29

Weapon: GLOCK Make 19 Model 9mm Caliber 4" Barrel Length BNCC480 Serial #

The above weapon was inspected by: Sgt. Mark. Johnson #3581 on 5-22-23
Firearms Range Instructor Signature Date of Inspection

The above employee was issued 50 ^{* Inspected} rounds of ammunition per Administrative Directive 05.01.122 on 5-22-23
Number Date

Requalification

1st Attempt - 30 Rounds	1st Practice - 30 Rounds	2nd Practice - 30 Rounds
# of hits <u>27</u> = <u>90</u> %	# of hits _____ = _____ %	# of hits _____ = _____ %
☒ Qualified ☐ Not Qualified		
<u>Sgt. Mark. Johnson #3581</u> Range Instructor's Signature Date <u>5-22-23</u>	Range Instructor's Signature _____ Date _____	Range Instructor's Signature _____ Date _____
<u>Good + Safe Shooter</u> <u>Slight Anticipation and Jerking Trigger</u> <u>(20) RDs Malfunctions Clearing Class 1,</u> <u>Class 2, + Class 3</u>		

2nd Attempt - 30 Rounds	3rd Attempt - 30 Rounds
# of hits _____ = _____ %	# of hits _____ = _____ %
☐ Qualified ☐ Not Qualified	☐ Qualified ☐ Not Qualified
Range Instructor's Signature _____ Date _____	Range Instructor's Signature _____ Date _____

During the requalification on this date, 5-22-23, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

Shooter's Signature DeAnna Brockhart Date 5-22-23 Range Instructor's Signature Sgt. Mark. Johnson #3581 Date 5-22-23

Firearms Range Rules

1. No employee who has been convicted of a crime of domestic violence in accordance with Administrative Directive 03.02.108 or who has a current order of protection against him or her that prohibits possession or use of firearms or who has been an inpatient in a mental facility within the past 5 years may possess, transport or receive a weapon or ammunition.
2. All firearms training shall be properly and adequately supervised by trained Firearms Range Instructors. All safety precautions shall be adhered to and enforced.
3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall NOT be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
5. No action shall be taken on the firing range without the prior command of the Firearms Range Instructor. A command shall NEVER be anticipated. Firing shall only be on the command of the Firearms Range Instructor.
6. Every weapon shall be treated as though it were loaded.
7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded ONLY when instructed by the Firearms Range Instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
11. All handguns shall be strapped in at all times, except while in the process of drawing and firing.
12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
16. A weapon shall never be fired after a squib round (firearm malfunction in which a fired projectile does not have enough force behind it to exit the barrel) without first contacting a Firearms Range Instructor who shall unload and check the barrel for obstructions.
17. Never move in front of the line of fire until the firing line has been cleared and the commands "go forward" or "the line is clear" has been given.
18. Dry firing on the range shall be supervised by a Firearms Range Instructor.
19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Deedee Brookhart
Employee's Printed Name

Deedee Brookhart
Employee's Signature

5-22-23
Date

Johnson, Malachi #3584
Firearms Range Instructor's Printed Name

Malachi Johnson #3584
Firearms Range Instructor's Signature

5-22-23
Date

Board Certified Firearms Qualification Range Score Sheet

Carothers James M. JR. DIXON 1
 Shooter's Name (Last, First MI) Range Location Shooter #

M [REDACTED]
 Gender Height Weight Hair Color Eye Color DOB Driver's License #

Kewanee Warden 449 [REDACTED] 8-14-2028
 Office Badge # FOID # FOID Exp. Date

Weapon: GLOCK 19 9mm 4" BGNT 373
 Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: Newman Newman on 11-29-2022
 Firearms Range Instructor Signature Date of Inspection

Qualification

1st Attempt – 30 Rounds

of hits 30 = 100 %

☒ Qualified ☐ Not Qualified

Newman 11-29-2022
 Range Instructor's Signature Date

Good Shooter

NO ISSUES

1st Practice – 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

3rd Practice – 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

2nd Practice – 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

2nd Attempt – 30 Rounds

of hits _____ = _____ %

☐ Qualified ☐ Not Qualified

Range Instructor's Signature _____ Date _____

Initial
for carry card

During the qualification on this date, 11-29-2022, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

James M. Carothers 11-29-2022 M. Newman 8157 Newman 11-29-2022
 Shooter's Signature Date Range Instructor's Signature Date

Board Certified Firearms Qualification Range Score Sheet

Name: James M. Carothers Jr. Practice

Shooter # _____

Weapon Familiarization – 50 Rounds	
# of hits <u>50</u> = <u>100</u> %	Instructor's Initials: <u>MM</u> Date: <u>11-29-2022</u>
<u>NO ISSUES</u>	

Course of Fire – 30 Rounds (Untimed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>MM</u> Date: <u>11-29-2022</u>
<u>NO ISSUES</u>	

Course of Fire – 30 Rounds (Untimed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>MM</u> Date: <u>11-29-2022</u>
<u>NO ISSUES</u>	

Board Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>MM</u> Date: <u>11-29-2022</u>
<u>NO ISSUES</u>	

Malfunction / Body Armor Drills – 50 Rounds	
# of hits <u>50</u> = <u>100</u> %	Instructor's Initials: <u>MM</u> Date: <u>11-29-2022</u>
<u>shot well / NO ISSUES</u>	

Board Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>MM</u> Date: <u>11-29-2022</u>
<u>NO ISSUES</u>	

Board Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>MM</u> Date: <u>11-29-2022</u>
<u>NO ISSUES</u>	

Board Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Malfunction / Body Armor Drills – 50 Rounds	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

James M. Carothers Jr.
Shooter's Signature

11-29-2022
Date

M. V. Brown 8157
Range Instructor's Signature

11-29-2022
Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

1. No employee who has been convicted of a crime of domestic violence in accordance with Administrative Directive 03.02.108 or who has a current order of protection against him or her that prohibits possession or use of firearms or who has been an inpatient in a mental facility within the past 5 years, may possess, transport or receive a weapon or ammunition.
2. All firearms training shall be properly and adequately supervised by trained Firearms Range Instructors. All safety precautions shall be adhered to and enforced.
3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall **NOT** be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
5. No action shall be taken on the firing range without the prior command of the Firearms Range Instructor. A command shall **NEVER** be anticipated. Firing shall only be on the command of the Firearms Range Instructor.
6. Every weapon shall be treated as though it were loaded.
7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded **ONLY** when instructed by the Firearms Range Instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
11. All handguns shall be strapped in at all times, except while in the process of drawing and firing.
12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
16. A weapon shall never be fired after a squib round (firearm malfunction in which a fired projectile does not have enough force behind it to exit the barrel) without first contacting a Firearms Range Instructor who shall unload and check the barrel for obstructions.
17. Never move in front of the line of fire until the firing line has been cleared and the commands "go forward" or "the line is clear" has been given.
18. Dry firing on the range shall be supervised by a Firearms Range Instructor.
19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

James M. Carothers Jr.

Employee's Printed Name

[Signature]

Employee's Signature

11/29/2022

Date

Newman

Firearms Range Instructor's Printed Name

[Signature] 8157

Firearms Range Instructor's Signature

11.29.2022

Date

Field Operations Firearms Qualification Range Score Sheet

Case, JeanMarie — Logan

Shooter's Name (Last, First, MI) Range Location Shooter #

F [REDACTED]

Gender Height Weight Hair Color Eye Color DOB Driver's License #

Logan 5'8" 150 198 [REDACTED] [REDACTED] 04/08/2003

Office Badge # FOID # FOID Exp. Date

C.C. 19 [REDACTED] 04/08/2003

Weapon: Glock 19 9mm 4" BNCD 438

Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: [Signature] on 3-14-23

Firearms Range Instructor Signature Date of Inspection

Qualification

1st Attempt – 30 Rounds	1st Practice – 30 Rounds	3rd Practice – 30 Rounds
# of hits <u>30</u> = <u>100</u> %	# of hits _____ = _____ %	# of hits _____ = _____ %
☒ Qualified ☐ Not Qualified		
<u>[Signature]</u> <u>3-16-23</u>	Range Instructor's Signature _____ Date _____	Range Instructor's Signature _____ Date _____
<u>Safe shooter, good fundamentals</u>		

2nd Practice – 30 Rounds	2nd Attempt – 30 Rounds
# of hits _____ = _____ %	# of hits _____ = _____ %
	☐ Qualified ☐ Not Qualified
Range Instructor's Signature _____ Date _____	Range Instructor's Signature _____ Date _____

During the qualification on this date, 3/13/23 I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

[Signature] 3/13/23 [Signature] 3-13-23

Shooter's Signature Date Range Instructor's Signature Date

Field Operations Firearms Qualification Range Score Sheet

Name: Lase, Sean

Practice

Shooter # _____

Weapon Familiarization – 50 Rounds

of hits 50 = 100 %Instructor's Initials: JS
Date: 3-14-23Completed safety

Course of Fire – 30 Rounds (Untimed)

of hits 30 = 100 %Instructor's Initials: JS
Date: 3-14-23slaps trigger at 15 yds

Course of Fire – 30 Rounds (Untimed)

of hits 30 = 100 %Instructor's Initials: JS
Date: 3-14-23anticipates shot at 15 yds

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JS
Date: 3-14-23anticipates shot at 15 yds

Malfunction / Body Armor Drills – 50 Rounds

of hits 50 = 100 %Instructor's Initials: JS
Date: 3-14-23Completed safety

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JS
Date: 3-14-23

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JS
Date: 3-15-23

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JS
Date: 3-15-23

Malfunction / Body Armor Drills – 50 Rounds

of hits 50 = 100 %Instructor's Initials: JS
Date: 3-15-23Completed safety

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JS
Date: 3-15-23

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JS
Date: 3-15-23

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JS
Date: 3-15-23

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JS
Date: 3-15-23

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: JS
Date: 3-16-23

Shooter's Signature

Date

Range Instructor's Signature

Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

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7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded **ONLY** when instructed by the Firearms Range Instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
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14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
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19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Jean Marie Cove
Employee's Printed Name

Jean Marie Cove
Employee's Signature

3/13/23
Date

Leake, Jade
Firearms Range Instructor's Printed Name

Jade Leake
Firearms Range Instructor's Signature

3-13-23
Date

Field Operations Firearms Qualification Range Score Sheet

DeWitt Vernon Graham Shooter's Name (Last, First, MI) Range Location Shooter #

Male Warden Gender Height Weight Hair Color Eye Color DOB Driver's License #

Weapon: Glock 19 9mm 4" BNC D378
Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: [Signature] on 3-7-2023
Firearms Range Instructor Signature Date of Inspection

Qualification

1st Attempt – 30 Rounds	1st Practice – 30 Rounds	3rd Practice – 30 Rounds
# of hits <u>24</u> = <u>80</u> %	# of hits _____ = _____ %	# of hits _____ = _____ %
☒ Qualified ☐ Not Qualified		
<u>[Signature]</u> <u>3-10-2023</u> Range Instructor's Signature Date	Range Instructor's Signature _____ Date _____	Range Instructor's Signature _____ Date _____
_____	_____	_____
_____	_____	_____
_____	_____	_____

2nd Practice – 30 Rounds	2nd Attempt – 30 Rounds
# of hits _____ = _____ %	# of hits _____ = _____ %
	☐ Qualified ☐ Not Qualified
Range Instructor's Signature _____ Date _____	Range Instructor's Signature _____ Date _____
_____	_____
_____	_____
_____	_____

During the qualification on this date, 3-10-2023, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

Vernon Schmitt 3-8-23 [Signature] 3-9-2023
Shooter's Signature Date Range Instructor's Signature Date

Field Operations Firearms Qualification Range Score Sheet

Name: Vernon Schmitt

Practice

Shooter # _____

Weapon Familiarization – 50 Rounds

of hits 50 = 100 %Instructor's Initials: PS
Date: 3/8/2023Anticipates recoil, slips trigger

Course of Fire – 30 Rounds (Untimed)

of hits 28 = 93 %Instructor's Initials: PS
Date: 3/8/2023Anticipates recoil, good shooter,
safe shooter

Course of Fire – 30 Rounds (Untimed)

of hits 29 = 96 %Instructor's Initials: PS
Date: 3/8/2023good shooter

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: PS
Date: 3-8-2023Good shooter, safe shooter

Malfunction / Body Armor Drills – 50 Rounds

of hits 50 = 100 %Instructor's Initials: PS
Date: 3-8-2023Body armor drills, control pairs, don't top
Class 1,2,3 controlled, safe

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 93 %Instructor's Initials: PS
Date: 3-8-2023good shooter, slips trigger

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: PS
Date: 3-8-2023Good shooter, slips trigger

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: PS
Date: 3-9-2023jerk trigger, anticipates recoil.

Malfunction / Body Armor Drills – 50 Rounds

of hits 29 = 96 %Instructor's Initials: PS
Date: 3-9-2023jerk trigger, anticipates recoil

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: PS
Date: 3-9-2023jerk trigger, anticipates recoil.

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: PS
Date: 3-9-2023anticipates recoil.

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: PS
Date: 3-9-2023good shooter.

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: PS
Date: 3-9-2023good shooter.

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: PS
Date: 3-10-2023good shooter

Shooter's Signature

Date

Range Instructor's Signature

Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

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3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall **NOT** be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
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7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded **ONLY** when instructed by the Firearms Range Instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
11. All handguns shall be strapped in at all times, except while in the process of drawing and firing.
12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
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19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Vernon DeWitt
Employee's Printed Name

Vernon DeWitt
Employee's Signature

3-8-2023
Date

Lt. B. Watkins 11918
Firearms Range Instructor's Printed Name

Lt. B. Watkins
Firearms Range Instructor's Signature

3-8-2023
Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Field Operations Firearms Requalification Range Score Sheet

Eddy, Melinda, J. Taylorville 1
 Shooter's Name (Last, First, MI) Range Location Shooter #

Female [REDACTED]
 Gender Height Weight Hair Color Eye Color DOB Driver's License #

Taylorville CC Warden 764 [REDACTED] none
 Office Badge # FOID # FOID Exp. Date

Weapon: 6006 19 9mm 4.02 BBH111
 Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: [Signature] on 5/12/23
 Firearms Range Instructor Signature Date of Inspection

The above employee was issued 8 rounds of ammunition per Administrative Directive 05.01.122 on 5/12/23
 Number Date

Requalification

1 st Attempt – 30 Rounds	1 st Practice – 30 Rounds	2 nd Practice – 30 Rounds
# of hits <u>28</u> = <u>93</u> %	# of hits _____ = _____ %	# of hits _____ = _____ %
☒ Qualified ☐ Not Qualified		
<u>[Signature]</u> <u>5/12/23</u> Range Instructor's Signature Date	Range Instructor's Signature _____ Date _____	Range Instructor's Signature _____ Date _____
<u>slight anticipation of recoil and slapping trigger. Shooter had a failure to fire at the 15 yard line, shooter cleared malfunction</u>		

2 nd Attempt – 30 Rounds	3 rd Attempt – 30 Rounds
# of hits _____ = _____ %	# of hits _____ = _____ %
☐ Qualified ☐ Not Qualified	☐ Qualified ☐ Not Qualified
Range Instructor's Signature _____ Date _____	Range Instructor's Signature _____ Date _____

During the requalification on this date, 5/12/23, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

[Signature] 5/12/23 [Signature] KARNES, TRGMT 5/12/23
 Shooter's Signature Date Range Instructor's Signature Date

Firearms Range Rules

1. No employee who has been convicted of a crime of domestic violence in accordance with Administrative Directive 03.02.108 or who has a current order of protection against him or her that prohibits possession or use of firearms or who has been an inpatient in a mental facility within the past 5 years, may possess, transport or receive a weapon or ammunition.
2. All firearms training shall be properly and adequately supervised by trained Firearms Range Instructors. All safety precautions shall be adhered to and enforced.
3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall **NOT** be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
5. No action shall be taken on the firing range without the prior command of the Firearms Range Instructor. A command shall **NEVER** be anticipated. Firing shall only be on the command of the Firearms Range Instructor.
6. Every weapon shall be treated as though it were loaded.
7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded **ONLY** when instructed by the Firearms Range Instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
11. All handguns shall be strapped in at all times, except while in the process of drawing and firing.
12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
16. A weapon shall never be fired after a squib round (firearm malfunction in which a fired projectile does not have enough force behind it to exit the barrel) without first contacting a Firearms Range Instructor who shall unload and check the barrel for obstructions.
17. Never move in front of the line of fire until the firing line has been cleared and the commands "go forward" or "the line is clear" has been given.
18. Dry firing on the range shall be supervised by a Firearms Range Instructor.
19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Melinda Goldy
Employee's Printed Name

Melinda Goldy
Employee's Signature

5/12/23
Date

KARNES, TRENT
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

5/12/23
Date

Field Operations Firearms Qualification Range Score Sheet

Farrington, Tiana M Logan C.C. Shooter's Name (Last, First, MI) Range Location Shooter #

F Lincoln C.C. 208 1-6-31 Gender Office Badge # FOID # Driver's License #

Glock 19 9mm 4" BNC D310 Weapon: Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: Jh Zhe on 4-4-23 Firearms Range Instructor Signature Date of Inspection

Qualification

1st Attempt – 30 Rounds	1st Practice – 30 Rounds	3rd Practice – 30 Rounds
# of hits <u>28</u> = <u>93</u> %	# of hits _____ = _____ %	# of hits _____ = _____ %
☒ Qualified ☐ Not Qualified		
<u>Jh Zhe</u> <u>9-4-23</u> Range Instructor's Signature Date	Range Instructor's Signature _____ Date _____	Range Instructor's Signature _____ Date _____
<u>anticipates shot,</u> <u>slaps trigger</u>		

2nd Practice – 30 Rounds	2nd Attempt – 30 Rounds
# of hits _____ = _____ %	# of hits _____ = _____ %
	☐ Qualified ☐ Not Qualified
Range Instructor's Signature _____ Date _____	Range Instructor's Signature _____ Date _____

During the qualification on this date, 4-3-23, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

[Signature] 4/3/23 Jh Zhe 4-3-23
Shooter's Signature Date Range Instructor's Signature Date

Field Operations Firearms Qualification Range Score Sheet

Name: Farrington, Tiana

Practice

Shooter # _____

Weapon Familiarization – 50 Rounds

of hits 50 = 100 %Instructor's Initials: JSDate: 4-4-23Slapping trigger, anticipating shot

Course of Fire – 30 Rounds (Untimed)

of hits 21 = 70 %Instructor's Initials: JSDate: 4-4-23Slapping trigger, anticipating

Course of Fire – 30 Rounds (Untimed)

of hits 24 = 80 %Instructor's Initials: JSDate: 4-4-23slapping trigger, anticipating

Field Operations Course – 30 Rounds (Timed)

of hits 25 = 83 %Instructor's Initials: JSDate: 4-4-23slapping trigger, rush shot

Malfunction / Body Armor Drills – 50 Rounds

of hits 50 = 100 %Instructor's Initials: JSDate: 4-4-23Completed safely

Field Operations Course – 30 Rounds (Timed)

of hits 23 = 76 %Instructor's Initials: JSDate: 4-4-23slapping trigger, rush shot

Field Operations Course – 30 Rounds (Timed)

of hits 20 = 66 %Instructor's Initials: JSDate: 4-5-23slapping trigger, anticipating shotTiana Farrington
Shooter's Signature4/8/23
Date

Field Operations Course – 30 Rounds (Timed)

of hits 24 = 80 %Instructor's Initials: JSDate: 4-5-23anticipates shot, needs to take slack out of trigger

Malfunction / Body Armor Drills – 50 Rounds

of hits 50 = 100 %Instructor's Initials: JSDate: 4-5-23Completed safely

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: JSDate: 4-5-23Used dummy rounds / skips trigger

Field Operations Course – 30 Rounds (Timed)

of hits 21 = 96 %Instructor's Initials: JSDate: 4-5-23slapping trigger

Field Operations Course – 30 Rounds (Timed)

of hits 26 = 86 %Instructor's Initials: JSDate: 4-5-23anticipating shot

Field Operations Course – 30 Rounds (Timed)

of hits 24 = 80 %Instructor's Initials: JSDate: 4-5-23anticipating shot

Field Operations Course – 30 Rounds (Timed)

of hits 26 = 86 %Instructor's Initials: JSDate: 4-7-23anticipating shot, slap triggerJS JS
Range Instructor's Signature4-3-23
Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

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3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall **NOT** be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
5. No action shall be taken on the firing range without the prior command of the Firearms Range Instructor. A command shall **NEVER** be anticipated. Firing shall only be on the command of the Firearms Range Instructor.
6. Every weapon shall be treated as though it were loaded.
7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded **ONLY** when instructed by the Firearms Range Instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
11. All handguns shall be strapped in at all times, except while in the process of drawing and firing.
12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
16. A weapon shall never be fired after a squib round (firearm malfunction in which a fired projectile does not have enough force behind it to exit the barrel) without first contacting a Firearms Range Instructor who shall unload and check the barrel for obstructions.
17. Never move in front of the line of fire until the firing line has been cleared and the commands "go forward" or "the line is clear" has been given.
18. Dry firing on the range shall be supervised by a Firearms Range Instructor.
19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Tiona Farrington
Employee's Printed Name

[Signature]
Employee's Signature

4/3/23
Date

Leake, Jade
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

4-3-23
Date

Field Operations Firearms Qualification Range Score Sheet

Galloway, Darren D Vienna
 Shooter's Name (Last, First, MI) Range Location Shooter #

M
 Gender Height Weight Hair Color Eye Color DOB

Shownee - Warden 195 02/01/2023
 Office Badge # FOID Exp. Date

Weapon: Glock 19 9mm 4" BTPT 891
 Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: on 9-14-22
 Firearms Range Instructor Signature Date of Inspection

Qualification

1st Attempt - 30 Rounds	1st Practice - 30 Rounds	3rd Practice - 30 Rounds
# of hits <u>30</u> = <u>100</u> %	# of hits <u> </u> = <u> </u> %	# of hits <u> </u> = <u> </u> %
☒ Qualified ☐ Not Qualified		
<u> </u> <u>9-30-22</u> Range Instructor's Signature Date	<u> </u> <u> </u> Range Instructor's Signature Date	<u> </u> <u> </u> Range Instructor's Signature Date
<u>excellent safe shooter</u>		

2nd Practice - 30 Rounds	2nd Attempt - 30 Rounds
# of hits <u> </u> = <u> </u> %	# of hits <u> </u> = <u> </u> %
	☐ Qualified ☐ Not Qualified
<u> </u> <u> </u> Range Instructor's Signature Date	<u> </u> <u> </u> Range Instructor's Signature Date

During the qualification on this date, 9-14-22, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

Shooter's Signature

9/14/22
Date

Range Instructor's Signature

9-14-22
Date

Field Operations Firearms Qualification Range Score Sheet

Name:

Galburay, Darren

Practice

Shooter #

Weapon Familiarization – 50 Rounds	
# of hits <u>50</u> = <u>100</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-26-22</u>
<u>excellent safe shooter</u>	

Course of Fire – 30 Rounds (Untimed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-26-22</u>
<u>fast but good</u>	

Course of Fire – 30 Rounds (Untimed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-26-22</u>
<u>good</u>	

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>29</u> = <u>96</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-26-22</u>
<u>anticipates recoil</u>	

Malfunction / Body Armor Drills – 50 Rounds	
# of hits <u>50</u> = <u>100</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-26-22</u>
<u>very good</u>	

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-29-22</u>
<u>excellent</u>	

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-29-22</u>
<u>excellent</u>	

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-29-22</u>
<u>excellent</u>	

Malfunction / Body Armor Drills – 50 Rounds	
# of hits <u>50</u> = <u>100</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-29-22</u>
<u>good very smooth</u>	

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>29</u> = <u>96</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-29-22</u>
<u>anticipated recoil</u>	

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-29-22</u>
<u>good</u>	

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-29-22</u>
<u>good</u>	

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-30-22</u>
<u>excellent</u>	

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>JM</u> Date: <u>9-30-22</u>
<u>excellent</u>	

Don Spivey 9/14/22
Shooter's Signature Date

John W. Anderson 9-14-22
Range Instructor's Signature Date

Firearms Range Rules

1. No employee who has been convicted of a crime of domestic violence in accordance with Administrative Directive 03.02.108 or who has a current order of protection against him or her that prohibits possession or use of firearms or who has been an inpatient in a mental facility within the past 5 years, may possess, transport or receive a weapon or ammunition.
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14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
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I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Galloway, Darren
Employee's Printed Name

[Signature]
Employee's Signature

9/14/22
Date

Underwood Brian
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

9.14.22
Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Field Operations Firearms Requalification Range Score Sheet

Greene, Brittany Western
 Shooter's Name (Last, First, MI) Range Location Shooter #

F [REDACTED]
 Gender Height Weight Hair Color Eye Color DOB Driver's License #

Western 157 [REDACTED] 4/1/24
 Office Badge # FOID # FOID Exp. Date

Weapon: Glock 19 9mm 4 BBSH 110
 Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: [Signature] on 7/1/23
 Firearms Range Instructor Signature Date of Inspection

The above employee was issued 50 rounds of ammunition per Administrative Directive 05.01.122 on 7/1/23
 Number Date

Requalification

1st Attempt – 30 Rounds

of hits 27 = 90 %

☒ Qualified ☐ Not Qualified

[Signature] 7/1/23
 Range Instructor's Signature Date

1st Practice – 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

2nd Practice – 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

2nd Attempt – 30 Rounds

of hits _____ = _____ %

☐ Qualified ☐ Not Qualified

Range Instructor's Signature _____ Date _____

3rd Attempt – 30 Rounds

of hits _____ = _____ %

☐ Qualified ☐ Not Qualified

Range Instructor's Signature _____ Date _____

During the requalification on this date, 7/1/23 I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

[Signature] 7/1/23 [Signature] 7/1/23
 Shooter's Signature Date Range Instructor's Signature Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

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Brittany Greene
Employee's Printed Name

[Signature]
Employee's Signature

7/1/23
Date

[Signature]
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

7/1/23
Date

Field Operations Firearms Regualification Range Score Sheet

Requalification

3rd Attempt – 30 Rounds

of hits _____ = _____ %

☐ **Qualified** ☐ **Not Qualified**

 Range Instructor's Signature Date

Shooter's Signature: [Signature] Date: 7/1/23 Range Instructor's Signature: L. J. Curry Date: 7/1/23

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

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I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Cherry, J. L.
Employee's Printed Name

[Signature]
Employee's Signature

7/1/23
Date

L. J. Cuddy
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

7/1/23
Date

Board Certified Firearms Qualification Range Score Sheet

Larry, Catherine STATEVILLE CC. 1
 Shooter's Name (Last, First MI) Range Location Shooter #

F [REDACTED]
 Gender Height Weight Hair Color Eye Color DOB Driver's License #

Joliet Treatment Center 492 [REDACTED] 12/11/2030
 Office Badge # FOID # FOID Exp. Date

Weapon: GLOCK 19 9mm 4" BHCD 427
 Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: MICHAEL EVANS on 3-1-2023
 Firearms Range Instructor Signature Date of Inspection

Qualification

1st Attempt – 30 Rounds

of hits 30 = 100 %

☒ Qualified ☐ Not Qualified

M. EVANS 3-1-23
 Range Instructor's Signature Date

SLAPS TRIGGER
PULL ANTICIPATES
RECOIL

1st Practice – 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

3rd Practice – 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

2nd Practice – 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

2nd Attempt – 30 Rounds

of hits _____ = _____ %

☐ Qualified ☐ Not Qualified

Range Instructor's Signature _____ Date _____

During the qualification on this date, 3-1-23, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

[Signature] 3/1/23 MICHAEL EVANS 3-1-2023
 Shooter's Signature Date Range Instructor's Signature Date

Board Certified Firearms Qualification Range Score Sheet

Name: _____ **Practice**

Shooter # _____

Weapon Familiarization – 50 Rounds	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Course of Fire – 30 Rounds (Untimed)	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Course of Fire – 30 Rounds (Untimed)	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Malfunction / Body Armor Drills – 50 Rounds	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Malfunction / Body Armor Drills – 50 Rounds	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Board Course – 30 Rounds (Timed)	
# of hits ____ = ____ %	Instructor's Initials: _____ Date: _____

Shooter's Signature _____

Date _____

Range Instructor's Signature _____

Date _____

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

1. No employee who has been convicted of a crime of domestic violence in accordance with Administrative Directive 03.02.108 or who has a current order of protection against him or her that prohibits possession or use of firearms or who has been an inpatient in a mental facility within the past 5 years, may possess, transport or receive a weapon or ammunition.
2. All firearms training shall be properly and adequately supervised by trained Firearms Range Instructors. All safety precautions shall be adhered to and enforced.
3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall **NOT** be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
5. No action shall be taken on the firing range without the prior command of the Firearms Range Instructor. A command shall **NEVER** be anticipated. Firing shall only be on the command of the Firearms Range Instructor.
6. Every weapon shall be treated as though it were loaded.
7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded **ONLY** when instructed by the Firearms Range Instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
11. All handguns shall be strapped in at all times, except while in the process of drawing and firing.
12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
16. A weapon shall never be fired after a squib round (firearm malfunction in which a fired projectile does not have enough force behind it to exit the barrel) without first contacting a Firearms Range Instructor who shall unload and check the barrel for obstructions.
17. Never move in front of the line of fire until the firing line has been cleared and the commands "go forward" or "the line is clear" has been given.
18. Dry firing on the range shall be supervised by a Firearms Range Instructor.
19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Larry Catherine
Employee's Printed Name

[Signature]
Employee's Signature

3/1/23
Date

EVANS, MICHAEL
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

3.1.2023
Date

Field Operations Firearms Requalification Range Score Sheet

Mitchell David W Pinckneyville
 Shooter's Name (Last, First, MI) Range Location Shooter #

M [REDACTED]
 Gender Height Weight Hair Color Eye Color DOB Driver's License #

[REDACTED] 160 [REDACTED] 1/21/30
 Office Badge # FID # FID Exp. Date

Weapon: Glock 19 9mm 4" BNCD 301
 Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: James G. [Signature] on 2-16-23
 Firearms Range Instructor Signature Date of Inspection

The above employee was issued 50 Rds reissued rounds of ammunition per Administrative Directive 05.01.122 on 2-16-23
 Number Date

Requalification

1st Attempt – 30 Rounds	1st Practice – 30 Rounds	2nd Practice – 30 Rounds
# of hits <u>29</u> = <u>96</u> % ☒ Qualified ☐ Not Qualified <u>James G. [Signature]</u> <u>2-16-23</u> Range Instructor's Signature Date <u>Good safe shooter</u> <u>20 Rds of Malfunction Drills</u> <u>(clearing class 1, 2 + 3) (50)</u>	# of hits _____ = _____ % Range Instructor's Signature _____ Date _____ _____ _____ _____	# of hits _____ = _____ % Range Instructor's Signature _____ Date _____ _____ _____ _____
2nd Attempt – 30 Rounds	3rd Attempt – 30 Rounds	
# of hits _____ = _____ % ☐ Qualified ☐ Not Qualified Range Instructor's Signature _____ Date _____ _____ _____ _____	# of hits _____ = _____ % ☐ Qualified ☐ Not Qualified Range Instructor's Signature _____ Date _____ _____ _____ _____	

During the requalification on this date, 2-16-23, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

[Signature] 2/16/23 James G. [Signature] 2-16-23
 Shooter's Signature Date Range Instructor's Signature Date

Firearms Range Rules

1. No employee who has been convicted of a crime of domestic violence in accordance with Administrative Directive 03.02.108 or who has a current order of protection against him or her that prohibits possession or use of firearms or who has been an inpatient in a mental facility within the past 5 years, may possess, transport or receive a weapon or ammunition.
2. All firearms training shall be properly and adequately supervised by trained Firearms Range Instructors. All safety precautions shall be adhered to and enforced.
3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall **NOT** be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
5. No action shall be taken on the firing range without the prior command of the Firearms Range Instructor. A command shall **NEVER** be anticipated. Firing shall only be on the command of the Firearms Range Instructor.
6. Every weapon shall be treated as though it were loaded.
7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded **ONLY** when instructed by the Firearms Range Instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
11. All handguns shall be strapped in at all times, except while in the process of drawing and firing.
12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
16. A weapon shall never be fired after a squib round (firearm malfunction in which a fired projectile does not have enough force behind it to exit the barrel) without first contacting a Firearms Range Instructor who shall unload and check the barrel for obstructions.
17. Never move in front of the line of fire until the firing line has been cleared and the commands "go forward" or "the line is clear" has been given.
18. Dry firing on the range shall be supervised by a Firearms Range Instructor.
19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

David Mitchell 160
Employee's Printed Name

[Signature]
Employee's Signature

2/16/23
Date

Butler, Joseph 3739
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

2-16-23
Date

Field Operations Firearms Qualification Range Score Sheet

Name: Daniel Monte

Practice

Shooter # 3

Weapon Familiarization – 50 Rounds

of hits 50 = 100 %Instructor's Initials: RJ
Date: 3-15-2023good shooter, slips trigger, magazine exchanges good

Course of Fire – 30 Rounds (Untimed)

of hits 29 = 96 %Instructor's Initials: RJ
Date: 3-15-2023slips trigger, shoots fast

Course of Fire – 30 Rounds (Untimed)

of hits 29 = 96 %Instructor's Initials: RJ
Date: 3-15-2023slips trigger

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: RJ
Date: 3-15-2023slips trigger

Malfunction / Body Armor Drills – 50 Rounds

of hits 50 = 100 %Instructor's Initials: RJ
Date: 3-15-2023body armor drills, controlled pairs, double tap class 1, 2, 3 conducted safely

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: RJ
Date: 3-15-2023good shooter

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: RJ
Date: 3-15-2023good shooter, safe shooter

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: RJ
Date: 3-16-2023good shooter

Malfunction / Body Armor Drills – 50 Rounds

of hits 50 = 100 %Instructor's Initials: RJ
Date: 3-16-2023good shooter, body armor drills, double tap, controlled pairs, class 1, 2, 3 malfunction

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: RJ
Date: 3-16-2023slips trigger

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: RJ
Date: 3-16-2023no issues, good shooter

Field Operations Course – 30 Rounds (Timed)

of hits 27 = 90 %Instructor's Initials: RJ
Date: 3-16-2023good shooter

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: RJ
Date: 3-16-2023good shooter

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: RJ
Date: 3-16-2023shoots quickly, slips trigger

Shooter's Signature

Date

Range Instructor's Signature

Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

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2. All firearms training shall be properly and adequately supervised by trained Firearms Range Instructors. All safety precautions shall be adhered to and enforced.
3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall **NOT** be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
5. No action shall be taken on the firing range without the prior command of the Firearms Range Instructor. A command shall **NEVER** be anticipated. Firing shall only be on the command of the Firearms Range Instructor.
6. Every weapon shall be treated as though it were loaded.
7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded **ONLY** when instructed by the Firearms Range Instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
11. All handguns shall be strapped in at all times, except while in the process of drawing and firing.
12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
16. A weapon shall never be fired after a squib round (firearm malfunction in which a fired projectile does not have enough force behind it to exit the barrel) without first contacting a Firearms Range Instructor who shall unload and check the barrel for obstructions.
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19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Daniel Monti
Employee's Printed Name

[Signature]
Employee's Signature

3/15/23
Date

L. B. Watkins 11918
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

3-16-2023
Date

Board Certified Firearms Requalification Range Score Sheet

Nurse, Mindi Sue Pontiac Shooter #
 Shooter's Name (Last, First MI) Range Location
F [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
 Gender Height Weight Hair Color Eye Color DOB Driver's License #
Pontiac CC 814 [REDACTED] 11-1-24
 Office Badge # FOID # FOID Exp. Date
 Weapon: Glock 19 9mm 4" BNCD 394
 Make Model Caliber Barrel Length Serial #
 The above weapon was inspected by: [Signature] #10320 MEAD on 2/9/23
 Firearms Range Instructor Signature Date of Inspection

Requalification

1 st Attempt - 30 Rounds	
# of hits <u>30</u> = <u>100</u> %	
☒ Qualified ☐ Not Qualified	
<u>[Signature]</u> <u>2/9/23</u>	
Range Instructor's Signature	Date
<u>Shooter has poor weak side support.</u>	

1 st Practice - 30 Rounds	
# of hits _____ = _____ %	
Range Instructor's Signature	Date
_____	_____
_____	_____
_____	_____

2 nd Practice - 30 Rounds	
# of hits _____ = _____ %	
Range Instructor's Signature	Date
_____	_____
_____	_____
_____	_____

Shooter is proficient @
 clearing class 1, 2, 3 malfunctions
 and press checks.

2 nd Attempt - 30 Rounds	
# of hits _____ = _____ %	
☐ Qualified ☐ Not Qualified	
Range Instructor's Signature	Date
_____	_____
_____	_____
_____	_____

3 rd Attempt - 30 Rounds	
# of hits _____ = _____ %	
☐ Qualified ☐ Not Qualified	
Range Instructor's Signature	Date
_____	_____
_____	_____
_____	_____

During the requalification on this date, 2/9/23, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

[Signature] 2/9/23 [Signature] 2/9/23
 Shooter's Signature Date Range Instructor's Signature Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

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5. No action shall be taken on the firing range without the prior command of the Firearms Range Instructor. A command shall **NEVER** be anticipated. Firing shall only be on the command of the Firearms Range Instructor.
6. Every weapon shall be treated as though it were loaded.
7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded **ONLY** when instructed by the Firearms Range Instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
11. All handguns shall be strapped in at all times, except while in the process of drawing and firing.
12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
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18. Dry firing on the range shall be supervised by a Firearms Range Instructor.
19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Mindi Nurse
Employee's Printed Name

Mindi Nurse
Employee's Signature

2/8/23
Date

Steven Mead #10320
Firearms Range Instructor's Printed Name

Steven Mead #10320
Firearms Range Instructor's Signature

2/9/23
Date

Field Operations Firearms Qualification Range Score Sheet

Nerio, Trina M Carthage
 Shooter's Name (Last, First, MI) Range Location Shooter #

F
 Gender Height Weight Hair Color Eye Color DOB Driver's License #

156 16020055
 Office Badge # FOID # FOID Exp. Date

Weapon: Glock 19 9mm 4in BNCD249
 Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: [Signature] 1418 / NATHAN S on 3-7-2023
 Firearms Range Instructor Signature Date of Inspection

Qualification

1 st Attempt – 30 Rounds	1 st Practice – 30 Rounds	3 rd Practice – 30 Rounds
# of hits <u>29</u> = <u>96</u> %	# of hits <u>0</u> = <u></u> %	# of hits <u></u> = <u></u> %
☒ Qualified ☐ Not Qualified		
<u>[Signature]</u> <u>3-10-2023</u> Range Instructor's Signature Date	<u></u> <u></u> Range Instructor's Signature Date	<u></u> <u></u> Range Instructor's Signature Date
<u>overslips slightly, overall good shooter.</u>		

2 nd Practice – 30 Rounds	2 nd Attempt – 30 Rounds
# of hits <u></u> = <u></u> %	# of hits <u></u> = <u></u> %
☐ Qualified ☐ Not Qualified	☐ Qualified ☐ Not Qualified
<u></u> <u></u> Range Instructor's Signature Date	<u></u> <u></u> Range Instructor's Signature Date

During the qualification on this date, 3-10-2023, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

Trina Nerio 3-8-2023 [Signature] 3-8-2023
 Shooter's Signature Date Range Instructor's Signature Date

Field Operations Firearms Qualification Range Score Sheet

Name: TRINA NERI

Practice

Shooter # _____

Weapon Familiarization – 50 Rounds

of hits 50 = 100 %Instructor's Initials: RJDate: 3/8/2023Good shooter, safe shooting shooting
lets, Adjusted sight

Course of Fire – 30 Rounds (Untimed)

of hits 30 = 100 %Instructor's Initials: RJDate: 3/8/2023Good group

Course of Fire – 30 Rounds (Untimed)

of hits 30 = 100 %Instructor's Initials: RJDate: 3/8/2023good shooter

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: RJDate: 3/8/2023good shooter, anticipated recoil.

Malfunction / Body Armor Drills – 50 Rounds

of hits 50 = 100 %Instructor's Initials: RJDate: 3/8/2023Body armor drills, controlled pairs double tap,
500, Class 1, 2, 3 conducted.

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: RJDate: 3/8/2023good shooter

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: RJDate: 3/8/2023good shooter

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: RJDate: 3-9-2023good shooter.

Malfunction / Body Armor Drills – 50 Rounds

of hits 29 = 96 %Instructor's Initials: RJDate: 3-9-2023good shooter.

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: RJDate: 3-9-2023good shooter

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: RJDate: 3-9-2023good shooter.

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: RJDate: 3/9/2023good shooter

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: RJDate: 3/9/2023good shooter

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: RJDate: 3/10/2023good shooter.Trina Neri
Shooter's Signature3-8-2023
DateTrina Neri
Range Instructor's Signature3-8-2023
Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

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7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
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12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
16. A weapon shall never be fired after a squib round (firearm malfunction in which a fired projectile does not have enough force behind it to exit the barrel) without first contacting a Firearms Range Instructor who shall unload and check the barrel for obstructions.
17. Never move in front of the line of fire until the firing line has been cleared and the commands "go forward" or "the line is clear" has been given.
18. Dry firing on the range shall be supervised by a Firearms Range Instructor.
19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Trina Nerio
Employee's Printed Name

Trina Nerio
Employee's Signature

3-8-2023
Date

Lt. B. Watkins 14918
Firearms Range Instructor's Printed Name

Lt. B. Watkins
Firearms Range Instructor's Signature

3-8-2023
Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Field Operations Firearms Requalification Range Score Sheet

Shooter's Name (Last, First, MI) Reichert, Kevin E Range Location Menard Shooter #

Gender M Height Weight Hair Color Eye Color DOB Driver's License #

Office Menard Badge # 462 FOID Exp. Date

Weapon: Glock Make 19 Model 9mm Caliber 4" Barrel Length 8NCD Serial # 279

The above weapon was inspected by: [Signature] J. Engelage 10247 on 4-17-23
Firearms Range Instructor Signature Date of Inspection

The above employee was issued rounds of ammunition per Administrative Directive 05.01.122 on
Number Date

Requalification

1st Attempt – 30 Rounds

of hits 30 = 100 %

☒ Qualified ☐ Not Qualified

[Signature] 4-17-23
Range Instructor's Signature Date

All around good fundamentals
Safe shooter.

1st Practice – 30 Rounds

of hits = %

Range Instructor's Signature Date

2nd Practice – 30 Rounds

of hits = %

Range Instructor's Signature Date

2nd Attempt – 30 Rounds

of hits = %

☐ Qualified ☐ Not Qualified

Range Instructor's Signature Date

3rd Attempt – 30 Rounds

of hits = %

☐ Qualified ☐ Not Qualified

Range Instructor's Signature Date

During the requalification on this date, 4-17-23, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

[Signature] 4-17-23 [Signature] 4-17-23
Shooter's Signature Date Range Instructor's Signature Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

1. No employee who has been convicted of a crime of domestic violence in accordance with Administrative Directive 03.02.108 or who has a current order of protection against him or her that prohibits possession or use of firearms or who has been an inpatient in a mental facility within the past 5 years, may possess, transport or receive a weapon or ammunition.
2. All firearms training shall be properly and adequately supervised by trained Firearms Range Instructors. All safety precautions shall be adhered to and enforced.
3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall **NOT** be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
5. No action shall be taken on the firing range without the prior command of the Firearms Range Instructor. A command shall **NEVER** be anticipated. Firing shall only be on the command of the Firearms Range Instructor.
6. Every weapon shall be treated as though it were loaded.
7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
9. Firearms shall be loaded and unloaded **ONLY** when instructed by the Firearms Range Instructor and after a safe position is taken at the firing point.
10. Firearms shall be pointed down range at all times when not in the secured holster position. (Never point a weapon at a person or outside the range boundaries.)
11. All handguns shall be strapped in at all times, except while in the process of drawing and firing.
12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
13. The finger shall remain outside of the trigger guard unless actually engaging the target.
14. The muzzle of a firearm shall never touch the ground.
15. In case of a misfire or hang-fire with the revolver, the firearm shall continue to be pointed downrange at least 10 seconds before opening the cylinder or action. In case of a misfire or hang-fire with a semi-automatic (rifle or handgun) the shooter shall attempt to clear the malfunction, fire his or her remaining rounds and notify a Range Instructor of the malfunction.
16. A weapon shall never be fired after a squib round (firearm malfunction in which a fired projectile does not have enough force behind it to exit the barrel) without first contacting a Firearms Range Instructor who shall unload and check the barrel for obstructions.
17. Never move in front of the line of fire until the firing line has been cleared and the commands "go forward" or "the line is clear" has been given.
18. Dry firing on the range shall be supervised by a Firearms Range Instructor.
19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

K. Berchelt
Employee's Printed Name

[Signature]
Employee's Signature

4/17/23
Date

Justin M. Engelage
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

4-17-23
Date

Field Operations Firearms Requalification Range Score Sheet

Shooter #

Driver's License #

NO DATE

FOLD Exp. Date

4"

Barrel Length

Serial #

Firearms Range Instructor Signature _____

on

05/17/2023

Date of Inspection _____

The above employee was issued 50 inspected

rounds of ammunition per Administrative Directive 05.01.122 on

05/17/2023

Number

Date _____

Requalification

3rd Attempt – 30 Rounds

of hits _____ = _____ %

☐ **Qualified** ☐ **Not Qualified**

Range Instructor's Signature Date

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

05/17/2023
Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

1. No employee who has been convicted of a crime of domestic violence in accordance with Administrative Directive 03.02.108 or who has a current order of protection against him or her that prohibits possession or use of firearms or who has been an inpatient in a mental facility within the past 5 years, may possess, transport or receive a weapon or ammunition.
2. All firearms training shall be properly and adequately supervised by trained Firearms Range Instructors. All safety precautions shall be adhered to and enforced.
3. An employee shall direct his or her attention to the Range Master at all times.
4. Talking shall **NOT** be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
5. No action shall be taken on the firing range without the prior command of the Firearms Range Instructor. A command shall **NEVER** be anticipated. Firing shall only be on the command of the Firearms Range Instructor.
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I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Charles Truitt
Employee's Printed Name

[Signature]
Employee's Signature

5/17/23
Date

Michael Evans
Firearms Range Instructor's Printed Name

[Signature]
Firearms Range Instructor's Signature

5-17-23
Date

Field Operations Firearms Qualification Range Score Sheet

Varga Jour R. East Moline CC Shooter's Name (Last, First, MI) Range Location Shooter #

M [REDACTED] Gender Height Weight Hair Color Eye Color DOB Driver's License #

WARDEN: EAST Moline *353 [REDACTED] 08/16/2018 Office Badge # FOID # FOID Exp. Date

Weapon: Glock 19 9mm 4 BNCD 425 Make Model Caliber Barrel Length Serial #

The above weapon was inspected by: Newman Newman on 7-10-2023 Firearms Range Instructor Signature Date of Inspection

Qualification

1st Attempt - 30 Rounds	1st Practice - 30 Rounds	3rd Practice - 30 Rounds
# of hits <u>28</u> = <u>93</u> %	# of hits _____ = _____ %	# of hits _____ = _____ %
☒ Qualified ☐ Not Qualified		
<u>Newman 8157</u> <u>7-10-23</u> Range Instructor's Signature Date	<u>[Signature]</u> _____ Range Instructor's Signature Date	<u>[Signature]</u> _____ Range Instructor's Signature Date
<u>overgrips</u> <u>jerks trigger</u> <u>good draw, good reloads</u> <u>understands malfunctions</u>		

2nd Practice - 30 Rounds	2nd Attempt - 30 Rounds
# of hits _____ = _____ %	# of hits _____ = _____ %
	☐ Qualified ☐ Not Qualified
<u>[Signature]</u> _____ Range Instructor's Signature Date	<u>[Signature]</u> _____ Range Instructor's Signature Date

During the qualification on this date, 7-10-23, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

[Signature] 7-10-23 M. Newman Newman 7-10-2023
Shooter's Signature Date Range Instructor's Signature Date

Field Operations Firearms Qualification Range Score Sheet

Name: Varga

Practice

Shooter # _____

Weapon Familiarization – 50 Rounds	
# of hits <u>50</u> = <u>100</u> %	Instructor's Initials: <u>mn</u> Date: <u>7-10-23</u>
<u>slapping trigger</u> <u>slingshot</u> , looks at target	

Course of Fire – 30 Rounds (Untimed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>mn</u> Date: <u>7-10-23</u>

Course of Fire – 30 Rounds (Untimed)	
# of hits <u>29</u> = <u>96</u> %	Instructor's Initials: <u>mn</u> Date: <u>7-10-23</u>
<u>slapping a couple</u>	

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>30</u> = <u>100</u> %	Instructor's Initials: <u>mn</u> Date: <u>7-10-23</u>
<u>overslips Jerking</u>	

Malfunction / Body Armor Drills – 50 Rounds	
# of hits <u>50</u> = <u>100</u> %	Instructor's Initials: <u>mn</u> Date: <u>7-10-23</u>
<u>slingshots</u>	

Field Operations Course – 30 Rounds (Timed)	
# of hits <u>28</u> = <u>93</u> %	Instructor's Initials: <u>mn</u> Date: <u>7-10-23</u>
<u>slapped a couple</u>	

Field Operations Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Field Operations Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Malfunction / Body Armor Drills – 50 Rounds	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Field Operations Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Field Operations Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Field Operations Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Field Operations Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

Field Operations Course – 30 Rounds (Timed)	
# of hits _____ = _____ %	Instructor's Initials: _____ Date: _____

[Signature]
Shooter's Signature

7-10-23
Date

74.7 Varga 8157
Range Instructor's Signature

7-10-23
Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

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4. Talking shall **NOT** be permitted on the firing line between shooters except when addressed by the Firearms Range Instructors.
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8. A firearm shall never be given to or taken from anyone unless the cylinder or action is open.
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19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

JOHN VARGAS

Employee's Printed Name

John Vargas

Employee's Signature

7-10-2023

Date

Newman

Firearms Range Instructor's Printed Name

Newman 8157

Firearms Range Instructor's Signature

7-10-2023

Date

ILLINOIS DEPARTMENT OF CORRECTIONS

Field Operations Firearms Requalification Range Score Sheet

Shooter's Name (Last, First MI) Wills, Anthony D Range Location Menard Shooter # _____

Gender M Height _____ Weight _____ Hair Color _____ Eye Color _____ DOB _____ Driver's License # _____

Office IDOC Badge # 419 FOID # _____ FOID Exp. Date 10-4-2027

Weapon: Make Glock Model 19 Caliber 9 Barrel Length 4" Serial # BNCD 212

The above weapon was inspected by: [Signature] #10347 on 5-4-23
Firearms Range Instructor Signature Date of Inspection

The above employee was issued _____ rounds of ammunition per Administrative Directive 05.01.122 on _____
Number Date

Requalification

1st Attempt – 30 Rounds

of hits 27 = 90 %

☒ Qualified ☐ Not Qualified

[Signature] #10347 5-4-23
Range Instructor's Signature Date

Safe shooter. Periodically slips trigger slightly.

1st Practice – 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

2nd Practice – 30 Rounds

of hits _____ = _____ %

Range Instructor's Signature _____ Date _____

2nd Attempt – 30 Rounds

of hits _____ = _____ %

☐ Qualified ☐ Not Qualified

Range Instructor's Signature _____ Date _____

3rd Attempt – 30 Rounds

of hits _____ = _____ %

☐ Qualified ☐ Not Qualified

Range Instructor's Signature _____ Date _____

During the requalification on this date, 5/4/23, I have received at least two hours of class instruction covering the physical dangers of the misuse of firearms; safety rules including range safety, care and cleaning of firearms, techniques of effective and safe shooting, and loading and unloading of the firearm; and any relevant changes in law or policy that would affect me.

In addition, I have not been convicted of a crime of domestic violence, as described in Administrative Directive 03.02.108; do not have an order or protection of any legal court order or restriction against me that prohibits the possession or use of firearms; and I have not been an inpatient in a mental facility within the past five years.

Shooter's Signature [Signature] Date 5-4-23 Range Instructor's Signature [Signature] #10347 Date 5-4-23

ILLINOIS DEPARTMENT OF CORRECTIONS

Firearms Range Rules

1. No employee who has been convicted of a crime of domestic violence in accordance with Administrative Directive 03.02.108 or who has a current order of protection against him or her that prohibits possession or use of firearms or who has been an inpatient in a mental facility within the past 5 years, may possess, transport or receive a weapon or ammunition.
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6. Every weapon shall be treated as though it were loaded.
7. Immediately upon picking up a firearm, the cylinder or action shall be opened to ensure that it is unloaded, then double checked.
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12. A handgun shall never be drawn from the holster or re-holstered with the finger in the trigger guard or on the trigger.
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14. The muzzle of a firearm shall never touch the ground.
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I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Anthony Wills
Employee's Printed Name

Anthony Wills
Employee's Signature

5-4-23
Date

Justin M. Engelage
Firearms Range Instructor's Printed Name

Justin M. Engelage 10347
Firearms Range Instructor's Signature

5-4-23
Date

Field Operations Firearms Qualification Range Score Sheet

The above weapon was inspected by: Mr. B. [Signature] on 3-15-2023
Firearms Range Instructor Signature Date of Inspection

DOC 0514 (Rev. 8/2019)

Field Operations Firearms Qualification Range Score Sheet

Name: Wuest, Kristy

Practice

Shooter # 1

Weapon Familiarization – 50 Rounds

of hits 50 = 100 %Instructor's Initials: RJDate: 3-15-2023good shooter, safe shooter, mag exchange
good, draw good

Course of Fire – 30 Rounds (Untimed)

of hits 30 = 100 %Instructor's Initials: RJDate: 3-15-2023good shoot, shooting left of center
sight checked

Course of Fire – 30 Rounds (Untimed)

of hits 29 = 96 %Instructor's Initials: RJDate: 3-15-2023good shoot, anticipated recoil

Field Operations Course – 30 Rounds (Timed)

of hits 29 = 96 %Instructor's Initials: RJDate: 3-15-2023needs to tighten grip on left

Malfunction / Body Armor Drills – 50 Rounds

of hits 50 = 100 %Instructor's Initials: RJDate: 3-15-2023conducted class 1,2,3 malfunctions

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: RJDate: 3-15-2023good shooter.

Field Operations Course – 30 Rounds (Timed)

of hits 27 = 90 %Instructor's Initials: RJDate: 3-15-2023good shooter.

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: RJDate: 3-15-2023good shooter

Malfunction / Body Armor Drills – 50 Rounds

of hits 50 = 100 %Instructor's Initials: RJDate: 3-16-2023malfunction drills conducted properly 1,2,3
body armor drills, controlled pass, double taps

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: RJDate: 3-16-2023slaps trigger,

Field Operations Course – 30 Rounds (Timed)

of hits 45 = 83 %Instructor's Initials: RJDate: 3-16-2023getting tired, slapping trigger overslapping
with right hand.

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: RJDate: 3-16-2023good shooter.

Field Operations Course – 30 Rounds (Timed)

of hits 28 = 93 %Instructor's Initials: RJDate: 3-16-2023better group

Field Operations Course – 30 Rounds (Timed)

of hits 30 = 100 %Instructor's Initials: RJDate: 3-16-2023good group,

Shooter's Signature

Date

Range Instructor's Signature

Date

Firearms Range Rules

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16. A weapon shall never be fired after a squib round (firearm malfunction in which a fired projectile does not have enough force behind it to exit the barrel) without first contacting a Firearms Range Instructor who shall unload and check the barrel for obstructions.
17. Never move in front of the line of fire until the firing line has been cleared and the commands "go forward" or "the line is clear" has been given.
18. Dry firing on the range shall be supervised by a Firearms Range Instructor.
19. No tobacco products shall be permitted at the range.
20. Individuals who appear to be under the influence of drugs or alcohol or who have the odor of drugs or alcohol on or about their persons shall not be allowed entrance to the range and shall be referred for reasonable suspicion testing.

I have read and understand the above range rules, shall comply with these rules, and understand that failure to comply may result in immediate dismissal from the range. I further affirm that I have not been convicted of domestic violence as described in Administrative Directive 03.02.108 and I do not have an order of protection or any legal court order or restriction against me that prohibits the possession or use of firearms and that I have not been an inpatient in a mental facility within the past 5 years.

Kristy Muest
Employee's Printed Name

Kristy Muest
Employee's Signature

3/15/23
Date

LC. B. WATKINS 11911
Firearms Range Instructor's Printed Name

A. S. [Signature]
Firearms Range Instructor's Signature

3-16-2023
Date

SUMMARY OF FIREARMS TRAINING FOR STATE OF ILLINOIS PRISON WARDENS

					Training	Training
Region 1		Name	Position	Appt. Date	Handgun	Banned Weapons
1	Joliet TC	Dr. Catherine Larry	Warden	2/16/20	3/1/23	None
2	Stateville	Charles Truitt	Warden	6/16/22	5/17/23	None
3	East Moline	John Varga	Warden	4/1/23	7/10/23	None
4	Hill	Tyrone Baker	Warden	4/1/23	5/2/23	None
5	Kewanee LSRC	James Carothers, Jr	Warden	4/1/23	11/29/22	None
6	Logan	Jean Case	Warden	8/16/23	3/13/23	None
Region 2		Name	Position	Appt. Date	Training	Training
					Handgun	Banned Weapons
7	Centralia	Daniel Monti	Warden	8/1/22	3/15/23	None
8	Illinois River	Cherryle Hinthorne	Warden	3/16/20	7/1/23	None
9	Lincoln	Tionna Farrington	Warden	3/16/22	4/3/23	None
10	Menard	Anthony Wills	Warden	4/1/21	5/4/23	None
11	Menard	Kevin Reichert	Warden	5/1/21	4/17/23	None
12	Pinckneyville	David Mitchell	Warden	2/16/21	2/16/23	None
13	Southwestern	Kristy Wuest	Warden	10/16/22	3/15/23	None
14	Western IL	Brittany Greene	Warden	1/16/21	7/1/23	None
Region 3		Name	Position	Appt. Date	Training	Training
					Handgun	Banned Weapons
15	Danville	Felecia Adkins	Warden	5/1/22	9/12/22	None
16	Lawrence	Deana Brookhart	Warden	7/16/20	5/22/23	None
17	Pontiac	Mindi Nurse	Warden	3/1/23	2/9/23	None
18	Shawnee	Darren Galloway	Warden	8/1/22	9/14/22	None
19	Taylorville	Melinda Eddy	Warden	1/16/21	5/12/23	None
20	Vandalia	Vernon Dewitt	Warden	8/1/22	3/8/23	None
21	Vienna	John Barwick, III	Warden	4/1/17	2/27/23	None
22	Graham	Trina Nerio	Warden	Unknown	3/7/23	None

PLAINTIFFS RETIRED FROM THE U.S. MILITARY

First Name	Last Name	Former / Retired Military
Christopher	Kasperski	I am former / retired Military WITH combat duty
Thomas	Chalmers	I am former / retired Military WITH combat duty
Nathaniel B	Moore	I am former / retired Military WITH combat duty
Jebidiah	Smail	I am former / retired Military WITH combat duty
Daniel	Ryken	I am former / retired Military WITH combat duty
Jeffrey	Leuty	I am former / retired Military WITH combat duty
Brian	Brummer	I am former / retired Military WITH combat duty
Charles	Atwater	I am former / retired Military WITH combat duty
David	Slightom	I am former / retired Military WITH combat duty
Andrew	O'Connell	I am former / retired Military WITH combat duty
Kevi	Wilkins	I am former / retired Military WITH combat duty
Sean	Gore	I am former / retired Military WITH combat duty
Michael	Speva	I am former / retired Military WITH combat duty
Brian	Eaker	I am former / retired Military WITH combat duty
David	Campbell	I am former / retired Military WITH combat duty
Tim	Weiss	I am former / retired Military WITH combat duty
Jaime E	Morales Jr	I am former / retired Military WITH combat duty
Eric	Taylor	I am former / retired Military WITH combat duty
Aaron	Logan	I am former / retired Military WITH combat duty
Jeffrey	Willhoit	I am former / retired Military WITH combat duty
Michael	Stiern	I am former / retired Military WITH combat duty
Corey	Dasenbrock	I am former / retired Military WITH combat duty
Keith	Erwin	I am former / retired Military WITH combat duty
Justin	Burton	I am former / retired Military WITH combat duty
Bryan	Wyrich	I am former / retired Military WITH combat duty
Jared	Harris	I am former / retired Military WITH combat duty
Chris	Hansen	I am former / retired Military WITH combat duty
Brian	Niven	I am former / retired Military WITH combat duty
Salvatore	Prato	I am former / retired Military WITH combat duty
Tom	Dummer	I am former / retired Military WITH combat duty
Bruce	Cline	I am former / retired Military WITH combat duty
Michael	Gasperini	I am former / retired Military WITH combat duty
Richard	Rees	I am former / retired Military WITH combat duty
Isabel	Lira	I am former / retired Military WITH combat duty
Guy	Blake	I am former / retired Military WITH combat duty
Steven	Alessi	I am former / retired Military WITH combat duty
Brian	Garrett	I am former / retired Military WITH combat duty
Nicholas	DePue	I am former / retired Military WITH combat duty
Norberto	Quintanar	I am former / retired Military WITH combat duty
Michael	Anglum	I am former / retired Military WITH combat duty
Nathan	Grissom	I am former / retired Military WITH combat duty

John	Arndt	I am former / retired Military WITH combat duty
Lloyd	Wolford	I am former / retired Military WITH combat duty
Justin	Couch	I am former / retired Military WITH combat duty
Waldon	Cook	I am former / retired Military WITH combat duty
Jason	Robertson	I am former / retired Military WITH combat duty
Dallas	Caron	I am former / retired Military WITH combat duty
Daniel	Rublaitus	I am former / retired Military WITH combat duty
Rickey	Miller	I am former / retired Military WITH combat duty
raymond	carlen	I am former / retired Military WITH combat duty
Kenneth	Kady	I am former / retired Military WITH combat duty
Billy	Jennings	I am former / retired Military WITH combat duty
Michael (Stev	McQueen	I am former / retired Military WITH combat duty
Matthew	Fricke	I am former / retired Military WITH combat duty
Ronald	Walerowicz	I am former / retired Military WITH combat duty
Joseph	Schiavone	I am former / retired Military WITH combat duty
Steven	Kreitzer	I am former / retired Military WITH combat duty
Jesse	Zirkelbach	I am former / retired Military WITH combat duty
Brian	PANNELL	I am former / retired Military WITH combat duty
William Bryar	Francois	I am former / retired Military WITH combat duty
matthew	miller	I am former / retired Military WITH combat duty
Thomas	Rader	I am former / retired Military WITH combat duty
Brian	Sornberger	I am former / retired Military WITH combat duty
Jonathan	Tracy	I am former / retired Military WITH combat duty
John	Van Riper	I am former / retired Military WITH combat duty
john	naden	I am former / retired Military WITH combat duty
Aaron	Wernz	I am former / retired Military WITH combat duty
Scott	Vana	I am former / retired Military WITH combat duty
Richard	Kogut	I am former / retired Military WITH combat duty
James	Reeves	I am former / retired Military WITH combat duty
Kenneth	Sutterfield	I am former / retired Military WITH combat duty
Joshua	Evans	I am former / retired Military WITH combat duty
Chad	McGinnis	I am former / retired Military WITH combat duty
Daniel	Rublaitus	I am former / retired Military WITH combat duty
Daniel	Hudzik	I am former / retired Military WITH combat duty
Michael	Triplett	I am former / retired Military WITH combat duty
Shawn	Davis	I am former / retired Military WITH combat duty
Michael	Mossman	I am former / retired Military WITH combat duty
John	Kraft	I am former / retired Military WITH combat duty
James	Slaughter	I am former / retired Military WITH combat duty
Thomas	Becker	I am former / retired Military WITH combat duty
Matthew	Lyons	I am former / retired Military WITH combat duty
David	Baker	I am former / retired Military WITH combat duty
Gabriel	Guzman	I am former / retired Military WITH combat duty

Dominic	Sabatina	I am former / retired Military WITH combat duty
Larry	Ruble	I am former / retired Military WITH combat duty
Danielle	Eberle	I am former / retired Military WITH combat duty
Levi	Huddleston	I am former / retired Military WITH combat duty
Michael	Giles	I am former / retired Military WITH combat duty
Roy	Schumacher	I am former / retired Military WITH combat duty
Anthony	Narbone	I am former / retired Military WITH combat duty
Benjamin	Springer	I am former / retired Military WITH combat duty
Jared	Heavener	I am former / retired Military WITH combat duty
Daniel	O,ÄôMalley	I am former / retired Military WITH combat duty
Julio	Walton	I am former / retired Military WITH combat duty
Preston	Hampton III	I am former / retired Military WITH combat duty
Brandon	Riley	I am former / retired Military WITH combat duty
Tony	Diamond Sr	I am former / retired Military WITH combat duty
Robert	Bunnell	I am former / retired Military WITH combat duty
Andrew	Rodriguez	I am former / retired Military WITH combat duty
Andrew	Rodriguez	I am former / retired Military WITH combat duty
Jeffrey	Urquhart	I am former / retired Military WITH combat duty
CHASE	DOWD	I am former / retired Military WITH combat duty
James	Parker	I am former / retired Military WITH combat duty
trent	mountain	I am former / retired Military WITH combat duty
Christopher	Reich	I am former / retired Military WITH combat duty
Simon	Claybrook	I am former / retired Military WITH combat duty
Peter	Dinklage	I am former / retired Military WITH combat duty
Lawrence	Cardwell	I am former / retired Military WITH combat duty
Dale	Greene	I am former / retired Military WITH combat duty
James	Button	I am former / retired Military WITH combat duty
Jason	Paganessi	I am former / retired Military WITH combat duty
SCOT	DECKER	I am former / retired Military WITH combat duty
Travis	Newberg	I am former / retired Military WITH combat duty
Brett	Waldrop	I am former / retired Military WITH combat duty
David	Dahlbach	I am former / retired Military WITH combat duty
Bradley	Rouse	I am former / retired Military WITH combat duty
Michael	Stare	I am former / retired Military WITH combat duty
Jason	Wolfe	I am former / retired Military WITH combat duty
Shannon	Fast	I am former / retired Military WITH combat duty
Scott	Frank	I am former / retired Military WITH combat duty
Darin	Dennis	I am former / retired Military WITH combat duty
Sean	Cain	I am former / retired Military WITH combat duty
John	Strain JR	I am former / retired Military WITH combat duty
Joan	Schack	I am former / retired Military WITH combat duty
Darrell	Johnson	I am former / retired Military WITH combat duty
Wayne	Walusiak	I am former / retired Military WITH combat duty

Christopher	Pollard	I am former / retired Military WITH combat duty
Anthony	Lorig	I am former / retired Military WITH combat duty
John	Lyon	I am former / retired Military WITH combat duty
Clifford	Oleson Jr.	I am former / retired Military WITH combat duty
Ron	Lemke	I am former / retired Military WITH combat duty
Ron	Lemke	I am former / retired Military WITH combat duty
Charles	Roeske	I am former / retired Military WITH combat duty
Joshua	Myers	I am former / retired Military WITH combat duty
Roger	Hagen	I am former / retired Military WITH combat duty
Joshua	Byers	I am former / retired Military WITH combat duty
Jerry	Stoneburner	I am former / retired Military WITH combat duty
Dustin	Prather	I am former / retired Military WITH combat duty
Logan	Capps	I am former / retired Military WITH combat duty
Robert	Skien	I am former / retired Military WITH combat duty
MICHAEL	MARTIN, SR	I am former / retired Military WITH combat duty
Philip	Hepp	I am former / retired Military WITH combat duty
Troy	Chandler	I am former / retired Military WITH combat duty
Don	Richhart	I am former / retired Military WITH combat duty
Thomas	Koehne	I am former / retired Military WITH combat duty
Nicholas	Smith	I am former / retired Military WITH combat duty
Jeremy	Deters	I am former / retired Military WITH combat duty
Luke	Darche	I am former / retired Military WITH combat duty
Michael	Wagner	I am former / retired Military WITH combat duty
Ryan	Christensen	I am former / retired Military WITH combat duty
Terry	Boyd	I am former / retired Military WITH combat duty
Nicholas	Hahn	I am former / retired Military WITH combat duty
Jaime	Pilia Arevalo	I am former / retired Military WITH combat duty
Michael	Slightom	I am former / retired Military WITH combat duty
Aaron	Hallett	I am former / retired Military WITH combat duty
Stephan	Ryan	I am former / retired Military WITH combat duty
Anthony	Lorig	I am former / retired Military WITH combat duty
John	Plemons	I am former / retired Military WITH combat duty
Brandon	Waddell	I am former / retired Military WITH combat duty
Mark	Pearson	I am former / retired Military WITH combat duty
John	Strain	I am former / retired Military WITH combat duty
Phillip	Smith	I am former / retired Military WITH combat duty
Andrew	Collier	I am former / retired Military WITH combat duty
Scott	Williams	I am former / retired Military WITH combat duty
Travis	Cerwin	I am former / retired Military WITH combat duty
Brian	Schultz	I am former / retired Military WITH combat duty
Preston	Hampton III	I am former / retired Military WITH combat duty
Robert	Spear	I am former / retired Military WITH combat duty
Brandon	Mitchell	I am former / retired Military WITH combat duty

Brian	Eaker	I am former / retired Military WITH combat duty
Roger	Hagen	I am former / retired Military WITH combat duty
SCOT	DECKER	I am former / retired Military WITH combat duty
Tyler	Lewis	I am former / retired Military WITH combat duty
Tyler	Lewis	I am former / retired Military WITH combat duty
Sean	Tibbs	I am former / retired Military WITH combat duty
Joe	Frederick	I am former / retired Military WITH combat duty
Justin	Wiltse	I am former / retired Military WITH combat duty
John	Zuidema	I am former / retired Military WITH combat duty
David	Christensen	I am former / retired Military WITH combat duty
Timothy	Childers	I am former / retired Military WITH combat duty
bill	Baker	I am former / retired Military WITH combat duty
Andrew	Wittmer	I am former / retired Military WITH combat duty
Christy	Cirino	I am former / retired Military WITH combat duty
Calvin	Purl	I am former / retired Military WITH combat duty
Spencer	Talbert	I am former / retired Military WITH combat duty
Adam	Roberts	I am former / retired Military WITH combat duty
Sten	Johnson	I am former / retired Military WITH combat duty
Stephen	Westlake	I am former / retired Military WITH combat duty
Tom	Parker	I am former / retired Military WITH combat duty
Duane	Turner	I am former / retired Military WITH combat duty
CHRISTOPHER	HARTNETT	I am former / retired Military WITH combat duty
Charles	Mercier	I am former / retired Military WITH combat duty
Edwin	Thomas	I am former / retired Military WITH combat duty
John	Demlow	I am former / retired Military WITH combat duty
Brandon	Kappes	I am former / retired Military WITH combat duty
David	Torkilsen	I am former / retired Military WITH combat duty
Scott	Mercer	I am former / retired Military WITH combat duty
Cody	Roundcount	I am former / retired Military WITH combat duty
Russell	Ivanov	I am former / retired Military WITH combat duty
Jon	Ledermann	I am former / retired Military WITH combat duty
Michael	DURBIN	I am former / retired Military WITH combat duty
Christopher	Daniel	I am former / retired Military WITH combat duty
Melvin	Beaulieu	I am former / retired Military WITH combat duty
Charles	Aldridge IV	I am former / retired Military WITH combat duty
David	Bridgeman	I am former / retired Military WITH combat duty
William	Bowden	I am former / retired Military WITH combat duty
Trent	Mountain	I am former / retired Military WITH combat duty
Kenny	Ewing	I am former / retired Military WITH combat duty
Joseph	Pigatti	I am former / retired Military WITH combat duty
Loren	Lensing	I am former / retired Military WITH combat duty
Fred	Terbrak	I am former / retired Military WITH combat duty
Neal	Toepfer	I am former / retired Military WITH combat duty

William	Newport III	I am former / retired Military WITH combat duty
Justin	Piessens	I am former / retired Military WITH combat duty
Donald	Kalina	I am former / retired Military WITH combat duty
Robert	Greenhagel	I am former / retired Military WITH combat duty
Heidijo	Elyea	I am former / retired Military WITHOUT combat duty
Matthew	Galloway	I am former / retired Military WITHOUT combat duty
Mark	Traxler	I am former / retired Military WITHOUT combat duty
KEVIN	ARIAS	I am former / retired Military WITHOUT combat duty
Matthew	Gowan	I am former / retired Military WITHOUT combat duty
Stephan	Quesnell	I am former / retired Military WITHOUT combat duty
Kenneth	Klenke	I am former / retired Military WITHOUT combat duty
Christopher	Johnson	I am former / retired Military WITHOUT combat duty
Daniel	Glomb	I am former / retired Military WITHOUT combat duty
Jeffrey R	Purtell	I am former / retired Military WITHOUT combat duty
Joseph	Luchek	I am former / retired Military WITHOUT combat duty
Eric	Petty	I am former / retired Military WITHOUT combat duty
kirk	allen	I am former / retired Military WITHOUT combat duty
Don	Ramert	I am former / retired Military WITHOUT combat duty
Jon	Hutchins	I am former / retired Military WITHOUT combat duty
Michael	Dyson	I am former / retired Military WITHOUT combat duty
Brent	E Smothers	I am former / retired Military WITHOUT combat duty
Cesar	Zurita	I am former / retired Military WITHOUT combat duty
Charles	Friend	I am former / retired Military WITHOUT combat duty
Jacob	Johnson	I am former / retired Military WITHOUT combat duty
Michael	Grafton	I am former / retired Military WITHOUT combat duty
David	Koch	I am former / retired Military WITHOUT combat duty
Christopher	Henning	I am former / retired Military WITHOUT combat duty
Douglas	Roosevelt	I am former / retired Military WITHOUT combat duty
Bryan	Wattleworth	I am former / retired Military WITHOUT combat duty
William	Hampton	I am former / retired Military WITHOUT combat duty
Andrew	Allen	I am former / retired Military WITHOUT combat duty
Justin	Scherf	I am former / retired Military WITHOUT combat duty
Brian	Thomas	I am former / retired Military WITHOUT combat duty
Mark	Anderko	I am former / retired Military WITHOUT combat duty
JULIO	ALVAREZ Sr.	I am former / retired Military WITHOUT combat duty
Paul	Pratt	I am former / retired Military WITHOUT combat duty
terry	bast	I am former / retired Military WITHOUT combat duty
Jordan	Donnelly	I am former / retired Military WITHOUT combat duty
Jason	Jost	I am former / retired Military WITHOUT combat duty
Jason	Beilsmith	I am former / retired Military WITHOUT combat duty
Rob	Knott	I am former / retired Military WITHOUT combat duty
raymond	thompson	I am former / retired Military WITHOUT combat duty
James	Curry	I am former / retired Military WITHOUT combat duty

Glenn	Carr	I am former / retired Military WITHOUT combat duty
James	Hrubik	I am former / retired Military WITHOUT combat duty
Jacob	Miller	I am former / retired Military WITHOUT combat duty
David	Arns	I am former / retired Military WITHOUT combat duty
Hoyt	Diehl	I am former / retired Military WITHOUT combat duty
William	Murry	I am former / retired Military WITHOUT combat duty
Johnny	Jones	I am former / retired Military WITHOUT combat duty
Kristen	Catencamp	I am former / retired Military WITHOUT combat duty
Erick	Kiner	I am former / retired Military WITHOUT combat duty
Rollin	Church	I am former / retired Military WITHOUT combat duty
Larry	Ruble	I am former / retired Military WITHOUT combat duty
Jerry	Boney	I am former / retired Military WITHOUT combat duty
Mark	Schmolke	I am former / retired Military WITHOUT combat duty
John	Turrentine	I am former / retired Military WITHOUT combat duty
Stephen	Stewart	I am former / retired Military WITHOUT combat duty
Jordan	Lalumendre	I am former / retired Military WITHOUT combat duty
Paul	Crutcher	I am former / retired Military WITHOUT combat duty
Jerald	Tarble	I am former / retired Military WITHOUT combat duty
James	Baker	I am former / retired Military WITHOUT combat duty
Jeremy	Rittenhouse	I am former / retired Military WITHOUT combat duty
David	Nelligan	I am former / retired Military WITHOUT combat duty
Craig	Machuga	I am former / retired Military WITHOUT combat duty
Helen	Bishop	I am former / retired Military WITHOUT combat duty
Sean	Robesky	I am former / retired Military WITHOUT combat duty
Ronald	Butler	I am former / retired Military WITHOUT combat duty
Brian	McNichols	I am former / retired Military WITHOUT combat duty
Andrew	Schwab	I am former / retired Military WITHOUT combat duty
Michael	Webb	I am former / retired Military WITHOUT combat duty
Lawrence	Stein	I am former / retired Military WITHOUT combat duty
Ross	Rosenberg	I am former / retired Military WITHOUT combat duty
Christopher	Tincher	I am former / retired Military WITHOUT combat duty
Dale	Lowrance	I am former / retired Military WITHOUT combat duty
Brandan	Mathus, Rout	I am former / retired Military WITHOUT combat duty
Marcin	Krzeminski	I am former / retired Military WITHOUT combat duty
Kevin	Jenkins	I am former / retired Military WITHOUT combat duty
Jesse	St. John	I am former / retired Military WITHOUT combat duty
Terry	Scroggin	I am former / retired Military WITHOUT combat duty
Paul	Millhuff	I am former / retired Military WITHOUT combat duty
Ronald	Cushman	I am former / retired Military WITHOUT combat duty
Christian	Jacobsen	I am former / retired Military WITHOUT combat duty
Michael	Thompson	I am former / retired Military WITHOUT combat duty
Jay	Anderson	I am former / retired Military WITHOUT combat duty
Wendy	Menigoz	I am former / retired Military WITHOUT combat duty

Gregory	Barnard	I am former / retired Military WITHOUT combat duty
Donald	Foster	I am former / retired Military WITHOUT combat duty
Michael	Edwards	I am former / retired Military WITHOUT combat duty
Dana	Jennings	I am former / retired Military WITHOUT combat duty
Patrick	Griffin	I am former / retired Military WITHOUT combat duty
John	Joseph	I am former / retired Military WITHOUT combat duty
Hassen	Drissi	I am former / retired Military WITHOUT combat duty
Clarence	Holmes	I am former / retired Military WITHOUT combat duty
Ricky	Schnetzler	I am former / retired Military WITHOUT combat duty
JOSE CALIXTC	DIOLA	I am former / retired Military WITHOUT combat duty
Robert	Beckman	I am former / retired Military WITHOUT combat duty
Spencer	Hasty	I am former / retired Military WITHOUT combat duty
Todd	Squires	I am former / retired Military WITHOUT combat duty
Steven	Paprocki	I am former / retired Military WITHOUT combat duty
Cal	Rieger	I am former / retired Military WITHOUT combat duty
Daniel	Leatz	I am former / retired Military WITHOUT combat duty
Michael	Crabtree	I am former / retired Military WITHOUT combat duty
John	Becker	I am former / retired Military WITHOUT combat duty
Michael	Rice	I am former / retired Military WITHOUT combat duty
Brad	Buysse	I am former / retired Military WITHOUT combat duty
David	Forshier	I am former / retired Military WITHOUT combat duty
Matthew	Meyer	I am former / retired Military WITHOUT combat duty
Jacob	Murphy	I am former / retired Military WITHOUT combat duty
Raymond	Tyburnski	I am former / retired Military WITHOUT combat duty
ALLAN	CAMPBELL	I am former / retired Military WITHOUT combat duty
Kevin	Rupe	I am former / retired Military WITHOUT combat duty
Jason	Sorensen	I am former / retired Military WITHOUT combat duty
Robert	Hare	I am former / retired Military WITHOUT combat duty
John	Taskay	I am former / retired Military WITHOUT combat duty
Tracy	Manns	I am former / retired Military WITHOUT combat duty
Anthony	Stamm	I am former / retired Military WITHOUT combat duty
Joseph	Maher	I am former / retired Military WITHOUT combat duty
Damon	Williams	I am former / retired Military WITHOUT combat duty
Brian	Bollinger	I am former / retired Military WITHOUT combat duty
James	Lawler	I am former / retired Military WITHOUT combat duty
David	French	I am former / retired Military WITHOUT combat duty
Rodney	Hamilton	I am former / retired Military WITHOUT combat duty
Dale	Vogel	I am former / retired Military WITHOUT combat duty
Todd	Best	I am former / retired Military WITHOUT combat duty
Jerry	Williams	I am former / retired Military WITHOUT combat duty
Nelson	Ruiz	I am former / retired Military WITHOUT combat duty
Ross	Cornett	I am former / retired Military WITHOUT combat duty
Peter	Curry	I am former / retired Military WITHOUT combat duty

Jack	Perritano	I am former / retired Military WITHOUT combat duty
Ronald	Hesser Jr	I am former / retired Military WITHOUT combat duty
Zachary	Allen	I am former / retired Military WITHOUT combat duty
Richard	Miller	I am former / retired Military WITHOUT combat duty
James	Gawron	I am former / retired Military WITHOUT combat duty
Shawne	Martz	I am former / retired Military WITHOUT combat duty
Timothy	Archer	I am former / retired Military WITHOUT combat duty
james	disanti	I am former / retired Military WITHOUT combat duty
Scott	Churne	I am former / retired Military WITHOUT combat duty
James	Griffin	I am former / retired Military WITHOUT combat duty
Jon	Armstrong	I am former / retired Military WITHOUT combat duty
Terry Jared	Marshall	I am former / retired Military WITHOUT combat duty
Frank	Molnar	I am former / retired Military WITHOUT combat duty
Harold	Robinson	I am former / retired Military WITHOUT combat duty
Randy	Curtis	I am former / retired Military WITHOUT combat duty
Bruce	Fletcher	I am former / retired Military WITHOUT combat duty
Don	Richhart	I am former / retired Military WITHOUT combat duty
Chad	Schaive	I am former / retired Military WITHOUT combat duty
Michael	Hockett	I am former / retired Military WITHOUT combat duty
Rendon	Meeker	I am former / retired Military WITHOUT combat duty
Ray	Magnuson	I am former / retired Military WITHOUT combat duty
Alcides	Plaza	I am former / retired Military WITHOUT combat duty
Mike	Noll sr.	I am former / retired Military WITHOUT combat duty
Joseph	Lillig	I am former / retired Military WITHOUT combat duty
Allen	Cralley	I am former / retired Military WITHOUT combat duty
Doug	Biller	I am former / retired Military WITHOUT combat duty
Stephen	Langheim	I am former / retired Military WITHOUT combat duty
Richard	Goodall	I am former / retired Military WITHOUT combat duty
Bruce	Moore	I am former / retired Military WITHOUT combat duty
Daniel	Hart	I am former / retired Military WITHOUT combat duty
Philip	Nagel	I am former / retired Military WITHOUT combat duty
Brandon	Walk	I am former / retired Military WITHOUT combat duty
Brian	Jobe	I am former / retired Military WITHOUT combat duty
John	Reynolds	I am former / retired Military WITHOUT combat duty
Shawn	Duncan	I am former / retired Military WITHOUT combat duty
Ivan	Madsen	I am former / retired Military WITHOUT combat duty
Steven	Mills	I am former / retired Military WITHOUT combat duty
Steven	Dolson	I am former / retired Military WITHOUT combat duty
Justin	Poynter	I am former / retired Military WITHOUT combat duty
David	Kinsman	I am former / retired Military WITHOUT combat duty
Kyle	Long	I am former / retired Military WITHOUT combat duty
Kyle	Nemeth	I am former / retired Military WITHOUT combat duty
Johnny	Meinhart	I am former / retired Military WITHOUT combat duty

Russ	Hoeffken	I am former / retired Military WITHOUT combat duty
Thomas	Kashul	I am former / retired Military WITHOUT combat duty
JEFFREY M	DENIS	I am former / retired Military WITHOUT combat duty
Robert	Stevenson	I am former / retired Military WITHOUT combat duty
Carlos	Rivera	I am former / retired Military WITHOUT combat duty
brian	koerner	I am former / retired Military WITHOUT combat duty
John	Gentry Sr	I am former / retired Military WITHOUT combat duty
Raymond	Thompson	I am former / retired Military WITHOUT combat duty
Curt	Henderson	I am former / retired Military WITHOUT combat duty
Bryan	Burton	I am former / retired Military WITHOUT combat duty
Marc	Johnson	I am former / retired Military WITHOUT combat duty
Marc	Tennill	I am former / retired Military WITHOUT combat duty
DARRIN	DISS	I am former / retired Military WITHOUT combat duty
Marc	Tennill	I am former / retired Military WITHOUT combat duty
Roger	Freund	I am former / retired Military WITHOUT combat duty
Marlin	Krueger	I am former / retired Military WITHOUT combat duty
Reene	Esparza	I am former / retired Military WITHOUT combat duty
Todd	Buckman	I am former / retired Military WITHOUT combat duty
Andrew	Brown	I am former / retired Military WITHOUT combat duty
Alan Wayne	Woolbright	I am former / retired Military WITHOUT combat duty
Dan	Scott	I am former / retired Military WITHOUT combat duty
Frederick	Cripe	I am former / retired Military WITHOUT combat duty
Ronald	Blakey	I am former / retired Military WITHOUT combat duty
Shane	Shelley	I am former / retired Military WITHOUT combat duty
James	Johnson	I am former / retired Military WITHOUT combat duty
Jon Carlo	Dagle	I am former / retired Military WITHOUT combat duty
Timothy	Hebb	I am former / retired Military WITHOUT combat duty
Edward	Wagner III	I am former / retired Military WITHOUT combat duty
Benjamin	Nelson	I am former / retired Military WITHOUT combat duty
Robert	Temes	I am former / retired Military WITHOUT combat duty
Gregory	Buban	I am former / retired Military WITHOUT combat duty
Matthew	Steinhilber	I am former / retired Military WITHOUT combat duty
Greg	Eccher	I am former / retired Military WITHOUT combat duty
Gary	Schollmann	I am former / retired Military WITHOUT combat duty
John	Harding	I am former / retired Military WITHOUT combat duty
Frank	Wilson	I am former / retired Military WITHOUT combat duty
Richard	Simmert	I am former / retired Military WITHOUT combat duty
John	Shetterly	I am former / retired Military WITHOUT combat duty
John	Wright	I am former / retired Military WITHOUT combat duty
Robert	Blokus	I am former / retired Military WITHOUT combat duty
Katie	DeaneSchlott	I am former / retired Military WITHOUT combat duty
William	Kelty	I am former / retired Military WITHOUT combat duty
Katie	DeaneSchlott	I am former / retired Military WITHOUT combat duty

Terry	Pogue	I am former / retired Military WITHOUT combat duty
Ron	Sandy	I am former / retired Military WITHOUT combat duty
Jeff	Dalton	I am former / retired Military WITHOUT combat duty
Kenneth	Storck	I am former / retired Military WITHOUT combat duty
Keith	Fedorev	I am former / retired Military WITHOUT combat duty
Leon	Opyd	I am former / retired Military WITHOUT combat duty
Carl	Ferron	I am former / retired Military WITHOUT combat duty
Terrence J	Ronczkowski	I am former / retired Military WITHOUT combat duty
John	O'Donnell	I am former / retired Military WITHOUT combat duty
James	Haskett II	I am former / retired Military WITHOUT combat duty
John	Yeruski	I am former / retired Military WITHOUT combat duty
Timothy	Riola	I am former / retired Military WITHOUT combat duty
Matthew	Weiss	I am former / retired Military WITHOUT combat duty
Ning	ZHANG	I am former / retired Military WITHOUT combat duty
Keith	Olbie	I am former / retired Military WITHOUT combat duty
Keri	Gaul	I am former / retired Military WITHOUT combat duty
Matthew	Bowman	I am former / retired Military WITHOUT combat duty
Jason	Marques	I am former / retired Military WITHOUT combat duty
John	Leezy	I am former / retired Military WITHOUT combat duty
ROBERT	BOWEN	I am former / retired Military WITHOUT combat duty
Juan	Gonzalez Jr	I am former / retired Military WITHOUT combat duty
Brian	Quinn	I am former / retired Military WITHOUT combat duty
Larry	Prather	I am former / retired Military WITHOUT combat duty
Dennis	Dozier	I am former / retired Military WITHOUT combat duty
Raymond	Luebbert	I am former / retired Military WITHOUT combat duty
John	Carr	I am former / retired Military WITHOUT combat duty
Eric	Zweigart	I am former / retired Military WITHOUT combat duty
Gregory	Ledbetter	I am former / retired Military WITHOUT combat duty
keith	flaxbeard	I am former / retired Military WITHOUT combat duty
Joseph	Bauer	I am former / retired Military WITHOUT combat duty
Vaughn	Howard	I am former / retired Military WITHOUT combat duty
Stan	Wallace	I am former / retired Military WITHOUT combat duty
Paul	Smith	I am former / retired Military WITHOUT combat duty
Jerry	Woker	I am former / retired Military WITHOUT combat duty
Garry	Willit	I am former / retired Military WITHOUT combat duty
William	Keyes	I am former / retired Military WITHOUT combat duty
Michael	Eddy	I am former / retired Military WITHOUT combat duty
Kevin	Hodge	I am former / retired Military WITHOUT combat duty
Kevin	Hodge	I am former / retired Military WITHOUT combat duty
Robert	Simpson	I am former / retired Military WITHOUT combat duty
Charles	Lipuma	I am former / retired Military WITHOUT combat duty
Chad	Schrader	I am former / retired Military WITHOUT combat duty
william	oconnell	I am former / retired Military WITHOUT combat duty

Dale	Dankoski	I am former / retired Military WITHOUT combat duty
Daniel	Fritchie	I am former / retired Military WITHOUT combat duty
Jonathan	Sabia	I am former / retired Military WITHOUT combat duty
Gary	Huddlestun	I am former / retired Military WITHOUT combat duty
Larry Todd	Manker	I am former / retired Military WITHOUT combat duty
Matt	Swearingen	I am former / retired Military WITHOUT combat duty
Michael	Meyer	I am former / retired Military WITHOUT combat duty
David	Nothkovich	I am former / retired Military WITHOUT combat duty
Franklin	Stoner	I am former / retired Military WITHOUT combat duty
LETO DEAN	VOUDRIE	I am former / retired Military WITHOUT combat duty
Mark	Welge	I am former / retired Military WITHOUT combat duty
Jason	Countryman	I am former / retired Military WITHOUT combat duty
Laverne	Canham, Jr	I am former / retired Military WITHOUT combat duty
Dan	Washburn	I am former / retired Military WITHOUT combat duty
Michael	Conrad	I am former / retired Military WITHOUT combat duty
Glenn	Dailey	I am former / retired Military WITHOUT combat duty
Philip	Grabbe	I am former / retired Military WITHOUT combat duty
Geoffery	Beatty	I am former / retired Military WITHOUT combat duty
Timothy	Meadows	I am former / retired Military WITHOUT combat duty
William	Busch	I am former / retired Military WITHOUT combat duty
Raymond	Thompson	I am former / retired Military WITHOUT combat duty
Patrick	Glover	I am former / retired Military WITHOUT combat duty
Raymond	Crompton	I am former / retired Military WITHOUT combat duty
Beau	Goodwin	I am former / retired Military WITHOUT combat duty
Darrell	Miller	I am former / retired Military WITHOUT combat duty
Timothy	King	I am former / retired Military WITHOUT combat duty
Keith	Hamann	I am former / retired Military WITHOUT combat duty
JEFFREY M	DENIS	I am former / retired Military WITHOUT combat duty
Orlando	Garcia	I am former / retired Military WITHOUT combat duty
Herbert	Seeger	I am former / retired Military WITHOUT combat duty
Cody	Herrington	I am former / retired Military WITHOUT combat duty
William	Lyman	I am former / retired Military WITHOUT combat duty
Robert	Brown	I am former / retired Military WITHOUT combat duty
Erica	Militello	I am former / retired Military WITHOUT combat duty
Michael	Collins	I am former / retired Military WITHOUT combat duty
Charles	Ritli, Jr	I am former / retired Military WITHOUT combat duty
Vince	Koers	I am former / retired Military WITHOUT combat duty
Brent	Sanders	I am former / retired Military WITHOUT combat duty
David	Lindquist	I am former / retired Military WITHOUT combat duty
Brian	Mckeen	I am former / retired Military WITHOUT combat duty
Jeff	Battles	I am former / retired Military WITHOUT combat duty
Patrick	Reinbeck	I am former / retired Military WITHOUT combat duty
David	Loebner	I am former / retired Military WITHOUT combat duty

David	Nicioli	I am former / retired Military WITHOUT combat duty
Joel	Huhta	I am former / retired Military WITHOUT combat duty
Raymond	Sidwell	I am former / retired Military WITHOUT combat duty
Blair	Pumphrey	I am former / retired Military WITHOUT combat duty
Adam	Runyon	I am former / retired Military WITHOUT combat duty
Dwight	Gray	I am former / retired Military WITHOUT combat duty
Elvis	Halipaj	I am former / retired Military WITHOUT combat duty
Kurt	Shepherd	I am former / retired Military WITHOUT combat duty
Emily	Shepherd	I am former / retired Military WITHOUT combat duty
Jason	Kruger	I am former / retired Military WITHOUT combat duty
Garrett	Bean	I am former / retired Military WITHOUT combat duty
Melrick	Jacobs	I am former / retired Military WITHOUT combat duty
David	Lamb	I am former / retired Military WITHOUT combat duty
Christopher	Hodson	I am former / retired Military WITHOUT combat duty
Jason	Moline	I am former / retired Military WITHOUT combat duty
James	Boyd	I am former / retired Military WITHOUT combat duty
Rylee	Hinkamper	I am former / retired Military WITHOUT combat duty
David	Sheffield	I am former / retired Military WITHOUT combat duty
Ryan	Nolte	I am former / retired Military WITHOUT combat duty
Paul	Bernand	I am former / retired Military WITHOUT combat duty
Jeff	Nemcher	I am former / retired Military WITHOUT combat duty
Matthew	Ruyle	I am former / retired Military WITHOUT combat duty
Matthew	Ruyle	I am former / retired Military WITHOUT combat duty
Timothy	Wheeler	I am former / retired Military WITHOUT combat duty
Daniel	Wolsey	I am former / retired Military WITHOUT combat duty
Alan	Grimmett	I am former / retired Military WITHOUT combat duty
Bryan	Gumm	I am former / retired Military WITHOUT combat duty
Dennis	Hightower	I am former / retired Military WITHOUT combat duty
Delbert	Skaar	I am former / retired Military WITHOUT combat duty
Jeffrey	Jones	I am former / retired Military WITHOUT combat duty
Leon	Valdez	I am former / retired Military WITHOUT combat duty
Kenneth	Riggs	I am former / retired Military WITHOUT combat duty
Keith	Mueller	I am former / retired Military WITHOUT combat duty
Timothy	Davis	I am former / retired Military WITHOUT combat duty
James	Nafziger	I am former / retired Military WITHOUT combat duty
Thomas	Bennett	I am former / retired Military WITHOUT combat duty
Socrates	Vela	I am former / retired Military WITHOUT combat duty
Waldemar	Sarat	I am former / retired Military WITHOUT combat duty
Kristopher	Anderson	I am former / retired Military WITHOUT combat duty
Nikola	Lohja	I am former / retired Military WITHOUT combat duty
Zhivago	Domino	I am former / retired Military WITHOUT combat duty
Robert	Abraham	I am former / retired Military WITHOUT combat duty
ben	hamilton	I am former / retired Military WITHOUT combat duty

Mike	Kackert	I am former / retired Military WITHOUT combat duty
Mark	Leja	I am former / retired Military WITHOUT combat duty
Allyn	Mack	I am former / retired Military WITHOUT combat duty
Jacob	Sager	I am former / retired Military WITHOUT combat duty
Brad	Smalley	I am former / retired Military WITHOUT combat duty
GREGORY	HAWKINS	I am former / retired Military WITHOUT combat duty
Zachary	Taylor	I am former / retired Military WITHOUT combat duty
Donald	Buening	I am former / retired Military WITHOUT combat duty
Raymond	Johnson	I am former / retired Military WITHOUT combat duty
Kieran	Kane	I am former / retired Military WITHOUT combat duty
Gregory	Barnard	I am former / retired Military WITHOUT combat duty
Rollin	Church	I am former / retired Military WITHOUT combat duty

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Timothy Childers, by and through his/her attorneys, Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I am currently retired from the military.
3. I served the United States of America by serving in the United States Marine Corps - Marine MARSOC special forces division.
4. As a part of my military training, I was trained in the following military weapons:
 - a) 9 mm hand gun
 - b) M240 Golf
 - c) MK19 Grenade Launcher
 - d) M2 50 caliber machine gun
 - e) M203 A1, A2, and A4
 - f) M249 SAW
 - g) AK47
 - h) .45 mm hand gun

- i) Grenades
 - j) AT4 Rocket Launcher
 - k) TOW Missile Launcher
5. I was deployed in active duty combat, having served two tours in Iraq.
 6. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Timothy Childers
Timothy Childers

Thomas G. DeVore
IL Bar No. 06305737
silver lake group, ltd.
118 N. 2nd St.
Greenville, IL 62246
Telephone - 618-664-9439
Facsimile 618-664-9486
tom@silverlakelaw.com

VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: 09 / 13 / 2023

By:



Timothy Childers

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Clarence Holmes, by and through his/her attorneys, Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I am currently retired from the military.
3. I served the United States of America by serving in the United States Air Force – Air Force Special Tactics.
4. As a part of my military training, I was trained in the following military weapons:
 - a) M-16 rifle
5. I was deployed in active duty combat, having served 1 tour in Saudi Arabia/ Desert Storm.
6. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Clarence Holmes
Clarence Holmes

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Greenville, IL 62246
Telephone - 618-664-9439
Facsimile 618-664-9486
tom@silverlakelaw.com

VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: 09 / 13 / 2023

By:



Clarence Holmes

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Joseph S Frederick, by and through his/her attorneys, Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I am currently retired from the military.
3. I served the United States of America by serving in the United States Navy Special Forces.
4. As a part of my military training, I was trained in the following military weapons:
 - a) 9mm
 - b) M16/M4
 - c) M240b
 - d) 50 Cal
5. I was deployed in active duty combat having served nine tours in OPERATION ENDURING FREEDOM, OPERATION NEW DAWN, OPERATION INHERANT RESOLVE, & OPERATION RESTORING HOPE.
6. If called to testify in this matter, I would testify to the truth of the matters as outlined in

this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Joseph S Frederick
Joseph S Frederick

Thomas G. DeVore
IL Bar No. 06305737
silver lake group, ltd.
118 N. 2nd St.
Greenville, IL 62246
Telephone - 618-664-9439
Facsimile 618-664-9486
tom@silverlakelaw.com

VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: 09 / 13 / 2023

By:



Joseph Frederick

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Roger J. Barski, by and through his/her attorneys, Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I am currently retired from the military.
3. I served the United State of America by serving in the United States Army – Army Ranger Special Forces division.
4. As a part of my military training, I was trained in the following military weapons:
 - a) M16
 - b) M14
5. I was deployed in active duty combat, having served in Vietnam for 19 months (1968-1970).
6. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Roger J. Barski

Roger J. Barski

Thomas G. DeVore

IL Bar No. 06305737

silver lake group, ltd.

118 N. 2nd St.

Greenville, IL 62246

Telephone - 618-664-9439

Facsimile 618-664-9486

tom@silverlakelaw.com

VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: 09 / 13 / 2023

By:

Roger J. Barski

Roger Barski

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Sean M Gore, by and through his/her attorneys, Thomas
DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I am currently retired from the military.
3. I served the United States of America by serving in the United States Marine Corps -
Marine RECON Missions special forces division.
4. As a part of my military training, I was trained in the following military weapons:
 - a) M4
 - b) M203
 - c) M32
 - d) M249
 - e) M240
 - f) M40A1
 - g) M110SASS
5. I was deployed in active duty combat having served 2 tours one in Afghanistan and one

MEU.

6. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Sean M Gore
Sean Gore

Thomas G. DeVore
IL Bar No. 06305737
silver lake group, ltd.
118 N. 2nd St.
Greenville, IL 62246
Telephone - 618-664-9439
Facsimile 618-664-9486
tom@silverlakelaw.com

VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: 09 / 13 / 2023

By:



Sean Gore

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Aaron Combs, by and through his/her attorneys,
Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I have completed the safety training required to obtain my conceal and carry license in Illinois pursuant to 430 ILCS 66 *et seq.*
3. As such, I hold a valid conceal and carry license issued by the State of Illinois.
4. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Aaron Combs

Aaron Combs

Thomas G. DeVore
IL Bar No. 06305737
silver lake group, ltd.
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tom@silverlakelaw.com

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Adam Hintz, by and through his/her attorneys,
Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I have completed the safety training required to obtain my conceal and carry license in Illinois pursuant to 430 ILCS 66 *et seq.*
3. As such, I hold a valid conceal and carry license issued by the State of Illinois.
4. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Adam Hintz

Thomas G. DeVore
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Facsimile 618-664-9486
tom@silverlakelaw.com

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

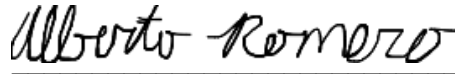
AFFIDAVIT

COMES NOW, Plaintiff, Alberto Romero, by and through his/her attorneys,
Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I have completed the safety training required to obtain my conceal and carry license in Illinois pursuant to 430 ILCS 66 *et seq.*
3. As such, I hold a valid conceal and carry license issued by the State of Illinois.
4. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

A handwritten signature in black ink that reads "Alberto Romero". The signature is written in a cursive style and is positioned above a horizontal line.

Alberto Romero

Thomas G. DeVore
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Facsimile 618-664-9486
tom@silverlakelaw.com

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Alva McDaniel, by and through his/her attorneys,
Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I have completed the safety training required to obtain my conceal and carry license in Illinois pursuant to 430 ILCS 66 *et seq.*
3. As such, I hold a valid conceal and carry license issued by the State of Illinois.
4. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Alva McDaniel

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tom@silverlakelaw.com

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Michael Anglum, by and through his/her attorneys,
Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I have completed the safety training required to obtain my conceal and carry license in Illinois pursuant to 430 ILCS 66 *et seq.*
3. As such, I hold a valid conceal and carry license issued by the State of Illinois.
4. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Michael Anglum

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EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Anthony Craven, by and through his/her attorneys,
Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I have completed the safety training required to obtain my conceal and carry license in Illinois pursuant to 430 ILCS 66 *et seq.*
3. As such, I hold a valid conceal and carry license issued by the State of Illinois.
4. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Anthony Craven

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**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Austin Davies, by and through his/her attorneys,
Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I have completed the safety training required to obtain my conceal and carry license in Illinois pursuant to 430 ILCS 66 *et seq.*
3. As such, I hold a valid conceal and carry license issued by the State of Illinois.
4. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Austin Davies

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**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
EFFINGHAM COUNTY, ILLINOIS**

ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Austin Skinner, by and through his/her attorneys,
Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I have completed the safety training required to obtain my conceal and carry license in Illinois pursuant to 430 ILCS 66 *et seq.*
3. As such, I hold a valid conceal and carry license issued by the State of Illinois.
4. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Austin skinner

Austin Skinner

Thomas G. DeVore
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**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
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ACCURACY FIREARMS, LLC <i>et al.</i>	)	
	)	
	)	2023-MR-04
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.	)	

AFFIDAVIT

COMES NOW, Plaintiff, Josef Barnette, by and through his/her attorneys,
Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I have completed the safety training required to obtain my conceal and carry license in Illinois pursuant to 430 ILCS 66 *et seq.*
3. As such, I hold a valid conceal and carry license issued by the State of Illinois.
4. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

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Josef Barnette

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**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
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	)	
	)	2023-MR-04
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.	)	

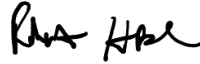
AFFIDAVIT

COMES NOW, Plaintiff, Robert Hare, by and through his/her attorneys,
Thomas DeVore and the Silver Lake Group, Ltd., and under oath, states as follows:

1. I am a named Plaintiff in the above referenced cause of action.
2. I have completed the safety training required to obtain my conceal and carry license in Illinois pursuant to 430 ILCS 66 *et seq.*
3. As such, I hold a valid conceal and carry license issued by the State of Illinois.
4. If called to testify in this matter, I would testify to the truth of the matters as outlined in this affidavit.

CERTIFICATION

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Robert Hare

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