No. 126849 (cons. with 126840)

In the
Supreme Court of Illinois

Case 18 CH 427

DANIEL D. EASTERDAY, ILLINOIS STATE RIFLE ASSOCIATION, and SECOND AMENDMENT FOUNDATION,

Plaintiffs-Appellants,

v.

VILLAGE OF DEERFIELD, ILLINOIS, a municipal corporation,

Defendant-Appellee.

Case 18 CH 498

GUNS SAVE LIFE, INC. and JOHN WILLIAM WOMBACHER III,

Plaintiffs-Appellants,

v.

VILLAGE OF DEERFIELD, ILLINOIS, and HARRIET ROSENTHAL, solely in her official capacity as Mayor of the Village of Deerfield,

Defendants-Appellees.

Appeal from the Appellate Court of Illinois, Second District
No. 2-19-0320
There heard on Appeal from the Circuit Court of Lake County, Illinois,
No. 18 CH 498, cons. into 18 CH 427.
The Honorable **Luis A. Berrones**, Judge Presiding

REPLY BRIEF OF PLAINTIFFS-APPELLANTS DANIEL D. EASTERDAY, ILLINOIS STATE RIFLE ASSOCIATION AND SECOND AMENDMENT FOUNDATION, INC.

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7/7/2021 11:52 PM
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ORAL ARGUMENT REQUESTED

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ARGUMENT

I. The Defendant's 2018 Ordinances were preempted by the General Assembly.

The appellate court, and the Defendant, are incorrect in concluding that the challenged Ordinances are not preempted by State law.

Defendant begins its Response by spending a substantial amount of time discussing other places where assault weapons and large capacity magazines are banned. That is irrelevant. Defendant also spends much time discussing various shooting incidents. These are tragic, and Plaintiffs in no way mean to diminish the terrible nature of these events, but they are also irrelevant to the legal issue at bar.

Similarly, *amici* Cook County and City of Chicago submit a Declaration regarding gun violence in Cook County (though only 4 out of 3,813 acutely-injured patients in Cook County Hospital in 2020 were allegedly caused by larger-firearms or rifles, which undercuts the main thesis of their *amicus* brief). All acute injuries are unfortunate and/or tragic, regardless of the cause, but none of this is relevant to the issues before the Court.

In contrast to discussing the well-known and multi-factored gun violence in Chicago, Defendant Deerfield writes about itself, and all its benefits for residents and corporations. These benefits, be they educational or commercial, are certainly wonderful attributes for a Village to have. However, these positive attributes, while desirable for any municipality, are likewise irrelevant. Furthermore, though not discussed by Defendant, these

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benefits presumably have existed for the past eight years while the former Ordinance, which allowed the banned items but imposed strict regulations (which Plaintiffs are not challenging) was in force.

The General Assembly "retains the constitutional authority to 'preempt the exercise of a municipality's home rule powers by expressly limiting that authority.' *Palm* [*v. Lake Shore Drive Condominium Ass'n.*], 2013 IL 110505, ¶ 31 [(2019)];." *Iwan Ries & Co. v. City of Chi.*, 2019 IL 124469, *P22 (2019). *See also* Ill. Const. 1970, art. VII, § 6(i) (home rule units 'may exercise and perform concurrently with the State any power or function of a home rule unit to the extent that the General Assembly by law does not specifically limit the concurrent exercise or specifically declare the State's exercise to be exclusive'). *See also City of Chicago v. Roman*, 184 Ill.2d 504, 517 (1998).

The plain language of § 65/13.1(c) of the FOID Card Act provided home rule units a one-time ten-day window from the date of this section's effective date to ban ownership or possession of assault weapons. The Defendant did not enact such a ban within this ten-day window and therefore, lost its opportunity to do so.

Additionally, as pertains to large capacity magazines, the Village has made it clear it intends to confiscate and destroy those owned by Village residents, but (A.) it was only through O-18-19 (and not anywhere in O-18-06) that large capacity magazines are now actually banned in the Village, and

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(B.) nowhere in O-13-24 are large capacity magazines even mentioned. This completely forecloses the argument that, as pertains to these items, the Village is merely amending O-13-24 as opposed to passing new legislation altogether. This is true when considering either O-18-06 or O-18-19.

Therefore, the large capacity magazine ban of O-18-19 is neither an "amendment" nor a clarification," and must be enjoined as a violation of state law.

The Defendant has argued that the subsequent Ordinances should be allowed, because a State Representative for the area believed it would be, and the Village President relied on that belief, and a Village resident was concerned that at some point the Village would try to do exactly what it has done. None of that is law, and erroneous beliefs and valid concerns are not substitutions for actual valid authority.

Further, the *Amici* Cook County and City of Chicago argue that ruling in Plaintiffs' favor would threaten their home rule authority, but that is not true at all, and the General Assembly should not be required to enact a new statute every time a home rule entity wishes to contravene a State's preemption statute, as *amici* Evanston, *et al*, argues. *Amicus* Brief of City of Evanston, *et al* at p.12.

The Defendant also contradicts itself when talking about its intentions and its plans. In its Response, Defendant argues it passed the regulations in O-13-24 as an "initial step" after which it could "allow itself time to survey

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the landscape" to determine its future steps. However, up to then, including in the following paragraph of its Response (Appellee's Response at p.12), the Defendant said the impetus for O-18-06 was the tragedy at Parkland. And not to diminish that tragedy, but there has been no assertion in this case of any grand plan on Defendant's part. There was simply an Ordinance restricting assault weapons in 2013, and a new Ordinance banning them in 2018. Plaintiffs take at face value that O-18-06 was a response to Parkland, but reject any assertion that it was anything but a hurried reaction in that moment, as opposed to a culmination of a plan to pass a "placeholder" ordinance and then later amend it after a careful survey of the landscape. Put simply, amendments are allowed, repeals-and-replacements are not, so Defendant has had to try and fit the 2018 Ordinance pegs into the amendment hole.

Defendant and its *amici*, who passed assault weapon regulations (or bans) during the ten-day window in 2013 would get to keep, enforce, and properly amend them, such as when a new feature is to be addressed, such as the "bump stock" feature Chicago added to its assault weapon definition in 2018. However, what they *cannot* do is pass a ban where none existed and call it an "amendment." This is true regardless of the labels used or the claimed circumstances. This is also not arbitrary, as *amici* City of Evanston, *et al*, argue. Those *amici* argue that "The FOID Act does not provide for any exceptions, limitations, or conditions on the home rule power to amend a

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lawfully enacted assault weapons ordinance. See 430 ILCS 65/13.1(c)." *Amicus* Brief of City of Evanston, *et al* at p.15. But the home rule entities must still comply with the applicable precedential definition of an "amendment." As Plaintiffs have noted, the principles involved have been well-settled for decades and longer. If the General Assembly intended the home-rule units to do whatever they wanted, whenever they wanted, the General Assembly would have written the statute differently or foregone preemption altogether.

II. <u>The Defendant's 2018 Ordinances were not amendments of the 2013 Ordinance.</u>

The Defendant is wrong in its assertion that the assault weapon ban in the 2018 Ordinance O-18-06 is merely an "amendment" of the 2013 Ordinance O-13-24.

Amici City of Evanston, *et al*, also get it wrong when they write that the issue is "whether home rule units may lawfully amend a lawfully enacted ordinance that purports to regulate the possession or ownership of assault weapons in a manner that is inconsistent with the Firearm Owners Identification Card Act, 430 ILCS 65/1, et seq. (the "FOID Act")." Evanston *Amici* Brief at p.1. That is not the issue; the FOID Act specifically states that such amendments are allowed. Rather, the issue is that Defendant's 2018 Ordinances **are not** amendments.

Defendant claims there is a distinction between whether a proper amendment must be minor or whether it can be large, citing to *Lamar*

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Whiteco Outdoor Corp. v. City of West Chicago, 355 Ill. App. 3d 352, 354-56 (2d Dist. 2005). But *Lamar* did not involve a challenge to whether the subject amendment was proper, or whether it was even an amendment and whether the term was just being used in the generic layperson sense, so that case has nothing to do with this situation. Further, the issue is not the size of the purported amendment, but whether its text can be reconciled with the original ordinance. Here, it cannot. Where the new enactment totally displaced the former provision, it cannot be considered an amendment. *Athey v. Peru*, 22 Ill. App. 3d 363, 368 (3rd Dist. 1974).

The Defendant cites to *Wilson v. County of Cook*, 937 F.3d 1029 (7th Cir. 2019), but there was no issue of preemption or the timeliness of the assault weapon ban in that case, and the Second Amendment issue that *was* involved in that case is not present here.

Per 430 ILCS 65/13.1(c), home rule units had **ten days** to ban assault weapons, and Defendant did not. Instead, Defendant passed O-13-24 which contained many restrictions on assault weapons. Its "Whereas" clause provided: "[A]ssault weapons should be subject to safe storage and security requirements as provided herein to limit the opportunity for access and use of firearms by untrained or unauthorized users[.]"

The ban of O-18-06 is not merely an amendment of O-13-24. *See Nolan v. City of Granite City*, 162 Ill. App. 3d 187, 190 (1st Dist. 1987)). Defendants and their *amici* claim that as long as they passed a placeholder ordinance,

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they could change it in whatever form they wanted in the future, even rewriting to say the exact opposite of the original. But it makes no sense that the General Assembly would allow such free-wheeling when the original mandate was to quickly pass an ordinance during a ten-day period in 2013 or be forever prohibited. If there was really the intent to allow home rule entities to do whatever they wanted, whenever they felt like it, then the General Assembly would not have passed the preemption provision in 430 ILCS 65/13.1(c) in the first place. The general principles stated in *Kalodimos v. Village of Morton Grove*, 103 Ill. 2d 483, 504 (1984), were superseded by the limitations and denials of 430 ILCS 65/13.1(c). Further, there is simply no indication that the General Assembly intended the meaning of "amendment" to be anything other than what it has meant pursuant to Illinois case law for more than a century.

Though the Defendant was allowed to properly amend O-13-24, State preemption means the Defendant was not allowed to pass a new Ordinance regarding "assault weapons" and large capacity magazines. That is what happened here. If "there is a clear conflict between the two ordinances where both cannot be carried out, then an intention to repeal will be presumed." *Nolan*, 162 Ill. App. 3d at 190.

The Defendant has cited to *Nolan*, but obscures the main point. When analyzing a subsequent ordinance, if a provision is the same as the previous version, it is a continuation of the old ordinance. If it is not the same, then it

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is a repeal and replace of the old ordinance. *See Athey*, 22 Ill. App. 3d at 367-68. And it makes no difference that *Athey* is a zoning case, or that the facts are not exactly the same as in this case. The principle is the same. The scope of the difference between O-13-24 and O-18-06/O-18-19 is substantial and irreconcilable. What was previously allowed is now banned, and with that ban comes new and severe penalties for non-compliance. It is predictable that Defendant and its *amici* would seek to minimize the new Ordinances' impact, but it is the text of the Ordinances that matters.

Further, Plaintiffs are as saddened and concerned about gun violence as anyone, whether it is a mass-shooting that seemed to get the Defendant's attention, or street crime in gang-infested neighborhoods, but it simply is not a relevant factor in interpreting the State's preemption statute in the FOID Card Act. Plaintiffs are unclear whether Defendant is attempting to cast them in the same light as the evildoers in the tragedies to which it keeps referring, or whether they are inferring that the very existence of the firearms at issue is what causes the tragedies, but in either untrue scenario the Defendant's transparent effort to infuse this matter with emotion should be rejected by this Court.

III. *Athey v. Peru* is directly on point with the instant case.

The Defendants attempt to distinguish *Athey v. Peru*, 22 Ill. App. 3d 363, 367 (3rd Dist. 1974), but its holdings are directly on point. The *Athey* Court noted:

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> Whether an ordinance is amendatory is not determined by its title; nor is the reference to another ordinance in the title of the new provision determinative . . . A subsequent statute revising the whole subject matter of a former statute and intended as a substitute for it, although it contains no express words to that effect, operates as a repeal of the former act.

Athey, 22 Ill. App. 3d at 367-368.

Here, Defendant passed Ordinance O-13-24 in 2013, which allowed "assault weapons" under certain conditions and restrictions, and then passed O-18-06, under which they are banned entirely. Per *Athey*, this constitutes an improper repeal of O-13-24 and substitution of that ordinance with O-18-06.

The Defendant's arguments against *Athey* only makes sense if the Court just goes along with Defendant's and *amici*s' characterization of the 2018 Ordinances as amendments, as if the Defendant's labels were dispositive. It is of course no surprise that the respective government entities would advance a position of "just go along with whatever we say and let us do what we want." In many cases involving home rule, those respective government entities can do just that. But here, when the substance of what Defendant did is required to be subject to scrutiny, the law states otherwise.

In *Park Forest v. Wojciechowski*, 29 Ill. 2d 435, 439 (1963), cited by Defendant and *amici*, where the court found an amendment where "there was no manifestation of an intent to entirely revise and repeal the original ordinance," here there clearly was such an intent, despite the window-dressing of calling it an "amendment," and the Defendant admits it in its

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Response brief (Defendant "regulate[d] assault weapons as an initial step and then adopt[ed] a complete ban."). Appellee Response, p.17.

Athey and *Nolan* instruct to look at the *substance* of the laws in determining whether an amendment actually occurred. Here, it did not. The 2018 Ordinances, which replaced the status of ownership of assault weapons from "yes, with conditions" to "no, never," cannot possibly be read as anything other than completely displacing the 2013 Ordinance. *See Athey*, 22 Ill. App. 3d at 368.

This is why arguing, as *amici* City of Evanston *et al* does, that changing the categories of persons who may own assault weapons from "everyone" to "only law enforcement and military members" is "merely narrow[ing] the scope of [permitted] persons" (*Amicus* Brief of City of Evanston, *et al*, at pp. 4-5) is almost the height of disingenuity, though the biggest example is the Attorney General *amicus* brief when it states that the Defendant "amended that [2013] ordinance in 2018 to more comprehensively regulate the ownership of assault weapons, including by prohibiting all possession of assault weapons within the Village." *Amicus* Brief of Illinois AG at pp. 14-15. If that is an "amendment," then 100+ years of case precedent differentiating between amending and repealing means nothing.

It is the text of the Ordinances that matters, not the Defendant's characterization of them. The Illinois AG argues that what may be an amendment of one statute may not qualify as such for a different statute.

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That is fine. But *Athey*, *Nolan*, and the other cases stand for the proposition that when a new ordinance conflicts with an old one such that they cannot co-exist, it is not an amendment, but a repeal of the old ordinance. Under the 2013 Ordinance, Plaintiff Easterday could own and possess an assault weapon legally. Under the 2018 Ordinances, he is a criminal if he does so. The Illinois AG argues about some "all-purpose" test, but the example here is so extreme that the discussion is unnecessary. Maybe some hypothetical future ordinance change will require the creation or application of some test, but the 2018 Ordinances fail on any level. Plaintiffs have therefore met their burden of showing that the Defendant's 2018 Ordinances violate the preemption statute, and to the extent that their constitutionality is to be considered (though Plaintiffs do not believe the question of whether the Ordinances are preempted by the State statute is a question of constitutionality), then Plaintiffs have met that burden as well. *See Accel Entm't Gaming, LLC v. Village of Elmwood Park*, 2015 IL App (1st) 143822.

IV. Large capacity magazines are not a category of assault weapons.

Defendant's claim that the definition of assault weapons includes large capacity magazines lacks merit, and its Response says nothing to change that.

Defendants want this Court to ignore the clear preemption provision as to handguns and handgun ammunition contained in 430 ILCS 66/90, arguing "the [FCCA] does not refer either directly or indirectly to [LCMs]."

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Appellant's Response Brief at p.27. From that the Defendant argues there is no basis for concluding that the General Assembly wanted to protect LCMs. *Id.* at pp. 28-29. Then, the Defendant disingenuously argues that the General Assembly is entirely silent on the issue of LCMs. *Id.* at p.28. Completely silent, except for the plain language of the statute.

Because LCMs and assault weapons are not synonymous, and not subsets of one another (*see* the differentiation of the two in *Heller v. District of Columbia*, 670 F.3d 1244 (D.C. Cir. 2011) (*Heller II*) and *Friedman v. City of Highland Park*, 784 F.3d 406 (7th Cir. 2015)), and especially since LCMs can also be used in handguns, the Defendant needed to ban them during the ten-day window in 2013 if it wanted to do so. Instead, it did not ban or even regulate them at all. This is not about "blanket protection" as Defendant argues, it is about Defendant not complying with the limitations of the preemption statute.

Defendant needs the Court to equate assault weapons and LCMs to sidestep its apparent error in not regulating them in 2013 (or even the original 2018 Ordinance O-18-06), but the language distinguishing the two is unambiguous, and, even if this Court were inclined to equate the two, the LCM ban in O-18-19 is preempted just like the assault weapon ban in O-18-06. The appellate court erred in ruling to the contrary and its judgment should be reversed.

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V. The appellate court erred in holding that it had jurisdiction over the Village's appeal.

Defendant really offers nothing in response to Plaintiff's argument on this issue, except to say that Plaintiffs are wrong. Plaintiffs stand on the arguments and facts as presented in their Opening Brief. The case law Plaintiffs cite is on point and the record supports a consolidation for judicial economy and convenience, not a merger.

One point made by Defendant, however, requires correction. Defendant argues that "the Circuit Court scheduled every hearing so that both cases would proceed together." Appellees' Response at p.32. While that was true to a point - and hardly means the cases were merged as opposed to serving the goal of judicial economy - that stopped being true when Plaintiffs were granted summary judgment. At that point, the GSL plaintiffs, with their additional claims, had their case scheduled for a future status. Plaintiffs were not included. The only way that makes sense it if the cases were not merged – otherwise Plaintiffs would have been dragged along to the future GSL proceedings.

The only case Defendant cites in its favor is *Dowe v. Birmingham Steel Corp.*, 2011 IL App (1st) 091997 (1st Dist. 2011), but the facts in case are in complete contrast to the facts here, and the case is inapplicable. As noted previously, in *Dowe* thirty-two personal injury cases against the same steel corporation for the same truck accident were consolidated and merged as one action because the court entered one summary judgment ruling which

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disposed of all cases, leaving one judgment from which to appeal. *Id.* at *P23.

Here, there are only two cases, the plaintiffs and defendants in both are not identical, and there are not identical claims. Plaintiffs made one claim, and the GSL plaintiffs made multiple. One of them happened to overlap. The numerous cases Plaintiffs discussed in their Opening Brief control this situation.

The *Easterday* Plaintiffs were not required to filed a cross-appeal.

The Defendant continues to incorrectly argue that the *Easterday* Plaintiffs were required to file a cross-appeal to contest jurisdiction, but the appellate court correctly noted that none was needed, since the Plaintiffs received all the relief they requested in the circuit court and therefore had no basis for appeal. *Easterday v. Village of Deerfield*, 2020 IL App (2d) 190879, *P23. The appellate court held this was so "because an appellee may defend the judgment on any basis appearing in the record). Moreover, the issue that Easterday and Guns Save Life raise implicates our jurisdiction, so it is not subject to waiver or forfeiture." *Id.* (quoting *Ruff v. Industrial Comm'n*, 149 Ill. App. 3d 73, 78 (1986)).

In the alternative, the *Easterday* Plaintiffs assert the Defendant's appellate court appeal should be reversed and dismissed for lack of jurisdiction, and the judgment of the circuit court should be reinstated.

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CONCLUSION

In light of the above, the Plaintiffs-Appellees, DANIEL D. EASTERDAY, ILLINOIS STATE RIFLE ASSOCIATION, and SECOND AMENDMENT FOUNDATION, INC., respectfully request this Honorable Court to:

1. Reverse the judgment of the appellate court that Defendants' Ordinances O-18-06 and O-18-19 are not preempted by State law, and are enforceable;
2. In the alternative, dismiss the Defendants' appellate court appeal for lack of jurisdiction and reinstate the circuit court's judgment;
3. Grant Plaintiffs any and all further relief as this Court deems just and proper.

July 7, 2021

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

I certify that this brief conforms to the requirements of Rules 341(a) and (b). The length of this brief, excluding the pages containing the Rule 341(d) cover, the Rule 341(h)(1) statement of points and authorities, the Rule 341(c) certificate of compliance, the certificate of service, and those matters to be appended to the brief under Rule 342(a), is 15 pages.

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PROOF OF FILING AND SERVICE

I hereby certify that on July 7, 2021, I electronically filed the foregoing **Reply Brief of Plaintiffs-Appellants Daniel D. Easterday, Illinois State Rifle Association, and Second Amendment Foundation, Inc.,** with the Clerk of the Illinois Supreme Court, by using the Odyssey eFileIL system.

I further certify that that the other participants in this appeal, named below, are registered service contacts on the Odyssey eFileIL system, and thus will be served by the Odyssey eFileIL system.

Clerk of the Supreme Court of Illinois (via e-filing only)

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Under penalties as provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct to the best of my knowledge, information, and belief.

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