

IN THE
APPELLATE COURT OF ILLINOIS
FIFTH JUDICIAL DISTRICT

ACCURACY FIREARMS, LLC <i>et al.</i>)	Interlocutory Appeal from the
)	Circuit Court for the Fourth
Plaintiffs-Respondents,)	Judicial Circuit, Effingham
)	County, Illinois
Vs.)	
)	
Governor JAY ROBERT PRITZKER,)	
in his official capacity; and KWAME)	
RAOUL, in his capacity as Attorney)	2023-MR-4
General,)	
)	
Defendants-Petitioners.)	
)	
and)	
)	
EMANUEL CHRISTOPHER WELCH,)	
in his capacity as Speaker of the House;)	
and DONALD F. HARMON, in his)	
capacity as Senate President,)	The Honorable
)	JOSHUA MORRISON,
Defendants.)	Judge Presiding.

**PLAINTIFFS-APPELLEES RESPONSE TO DEFENDANT-APPELLANTS PETITION
FOR REVIEW OF TEMPORARY RESTRAINING ORDER
PURSUANT TO IL. SUP. CT. R. 307(D)**

PRELIMINARY MATTERS

In the circuit court, the Petitioners in this case filed a response to the Respondents verified motion for temporary restraining order, which motion of Respondents was further supported by a verified complaint for declaratory and injunctive relief. The Court will find the response filed by the Petitioners was not verified. 735 ILCS 5/2-605 expressly provides that when a pleading has been verified, every subsequent pleading must also be verified except as excused by the Court. In this case, the unverified response to the verified complaint and verified motion for temporary

restraining order was not excused by the Court. The responsive pleading which attempts to adduce facts for the purpose of controverting facts plead by Respondents verified complaint for an injunction must be disregarded as if the Petitioner had filed no response. *Firkus v. Firkus*, 200 Ill.App.3d 982 (1990), (citing *Capitol Records Inc. v. Vee Jay Records*, 47 Ill.App.2d 468 (1964)) As such, as it relates to any factual matters, the Court is left with only with the verified pleadings filed by the Respondents in their request for a temporary restraining order. This issue is highly relevant to the Court’s analysis of the single subject rule and equal protection.

RELEVANT FACTUAL ISSUES

The Petitioners proclaim the subject of the Public Act was “the regulation of firearms. At this stage, the Court is constrained to verified facts in the record and nowhere in the verified complaint, or the exhibits attached which contain the public record of HB5471, will the Court find any indicia of this act having a subject regarding the regulation of firearms. The bill as introduced states in the title that its an act regarding regulation. The bill as it passed out of the general assembly still states in its title that it’s an act regarding regulation. Given there is no legislative debate, there is nothing else in the legislative record for which the Court might conclude any other legitimate subject of the bill. The Petitioners are foreclosed from appearing in this Court, or the circuit court for that matter, and providing unsupported factual allegations as to what the subject or public purpose of HB 5471 might be. The record adduced by the Respondents is what the Court must consider and on that record the Court only has “an act concerning regulation.

As it relates to equal protection, the Petitioners spend a great deal of time discussing the efficacy of this bill. Regardless of the standard of review applied in the equal protection analysis, which will be discussed later, the Petitioners make all kinds of unsubstantiated factual assertions not supported by the record. For example, the Petitioners aver that reducing firearms deaths and mass

shooting casualties is the legitimate government interest being furthered. This factual averment can be found nowhere in the record. Furthermore, to aver that those with certain firearms training or performing certain duties pose a smaller risk to the public at large when handling these weapons is complete conjecture not supported by the record. The Respondents cannot stress enough that as a result of the Petitioners own legislative errors they have backed themselves into a corner given no factual support exists for their contentions. Any facts they attempt to adduce must be disregarded.

I. Respondents have a right in need of protection.

Petitioners do not take the position Respondents don't have a right in need of protection. It seems they readily admit Respondents have a right to challenge the constitutionality of a statute when it impacts his or her rights. *People v. Jaundon*, 307 Ill. App. 3d 427 (1st Dist. 1990). There is no doubt this bill impacts the rights of Respondents for whether the bill is about regulation in general, regulation of firearms, or any other subjects the Petitioners might choose to throw out there as this case proceeds, the bill effects every person in the state and as such it impacts the rights of Respondents who are afforded the opportunity to seek redress in the Courts.

However, there is some conflating in the case in regard to rights of Respondents which needs to be clarified for the Court. Judge Morrison states correctly that while Petitioners argue HB 5471 impairs their fundamental right to bear arms, the law was enacted in violation of four enumerated requirements of the Illinois Constitution. In regard to the right in need of protection, solely as it relates to the elements of the restraining order, the right of Petitioners to not be subjected to a statute passed in violation of the Illinois constitution is the right being protected which the circuit court accurately determined.

Secondly, as mentioned by Judge Morrison, in regard to the due process and equal protection analysis which will be discussed later herein, the Court must consider what right is being

implicated within the body of the legislation itself in order to determine which level of scrutiny to apply in the due process and equal protection analysis. Given the substance of the regulation is in large part in regard to firearms restrictions, the Court has to take that into consideration when analyzing the due process and equal protection claims. Judge Morrison found the right being implicated in HB 5471 is the fundamental right to bear arms and as such any analysis of due process or equal protection must pass strict scrutiny.

The Petitioners refer to the *Kalodimos* case to support their proposition that regulations of firearms don't implicate a fundamental right in Illinois. The relevant provision of *Kalodimos* which the Petitioners rely on has long been outdated by Federal and State jurisprudence: "While the right to possess firearms for purposes of self-defense may be necessary to protect important personal liberties from encroachment by other individuals, it does not lie at the heart of the relationship between individuals and their government. The right to arms guaranteed by the Federal Constitution has never been thought to be an individual right, as distinguished from a collective right (*United States v. Miller* (1939), 307 U.S. 174, 83 L. Ed. 1206, 59 S. Ct. 816)". (See *Kalodimos v. Vill. of Morton Grove*, 103 Ill. 2d 483, 509 (1984))

However, since the time of *Kalodimos* which relied on *U.S. v. Miller*, numerous federal cases have held the right to bear arms is an individual right which is fundamental. In reliance upon that federal jurisprudence, the holding in *Kalodimos* no longer applies. This Court should review the holding of the Illinois Supreme Court *Guns Save Life, Inc. v. Ali* in regard to the constitutionality of an ordinance which placed a tax on firearms and ammunition, where the Illinois Supreme Court held:

"We agree that the ordinances impose a burden on the exercise of a fundamental right protected by the second amendment. At its core, the second amendment protects the right of law-

abiding citizens to keep and bear arms for self-defense in the home. *District of Columbia v. Heller*, 554 U.S. 570, 635, 128 S.Ct. 2783, 171 L.Ed.2d 637 (2008). In *McDonald v. City of Chicago*, 561 U.S. 742, 778, 130 S.Ct. 3020, 177 L.Ed.2d 894 (2010), the United States Supreme Court stated that “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.” (See *Guns Save Life, Inc. v. Ali*, 2021 IL 126014). The *Ali* Court went on to state that while the taxes do not directly burden a law-abiding citizen's right to use a firearm for self-defense, they do directly burden a law-abiding citizen's right to acquire a firearm and the necessary ammunition for self-defense. This Court will clearly find the purpose of HB 5471 is an attempt to regulate Respondents ability to purchase firearms and as such when it comes to due process and equal protection, the standard of review is strict scrutiny.

II. Irreparable Injury has been established.

Plaintiffs are being immediately and irreparably harmed each and every day in which they continue to be subjected 720 ILCS 5/24-1.09 *et seq.* and 720 ILCS 5/24-1.10 *et seq.* which were adopted in violation of constitutional principles. As a result of these violations a fundamental right has been impaired. When a violation of constitutional rights has been alleged, a further showing of irreparable injury is not required. *Makindu v. Illinois High School Assn.*, 2015 IL App (2d) 141201 (2015). This rule of law is even further defined in *Makindu* as it relates to equal protection in that equal-protection rights are so fundamental to our society that any violation of those rights causes irreparable harm. *Id.*

“To demonstrate irreparable injury, the moving party need not show an injury that is beyond repair or compensation in damages, but rather need show only transgressions of a continuing nature.” *Victor Township Drainage Dist. 1 v. Lundeen Family Farm P’ship*, 2014 IL App (2d) 140009 ¶ 50.

The injury to a plaintiff “must be in the form of plaintiff’s legal rights being sacrificed if plaintiff is forced to await a decision on the merits.” *Hough v. Weber*, 202 Ill. App. 3d 674, 686 (2nd Dist. 1990).

The legal rights being sacrificed are the rights to bear arms which is being restrained pursuant to the provisions of 720 ILCS 5/24-1.09 *et seq.* and 720 ILCS 5/24-1.10 *et seq.* which were adopted in violation of four separate and distinct constitutional requirements. When a right such as the one being violated here is alleged, irreparable injury is satisfied. *Makindu v. Illinois High School Assn.*, 2015 IL App (2d) 141201 (2015)

III. Respondents have no adequate remedy at law

There is no adequate remedy at law because the loss of the continuous sacrifice of legal rights that cannot be cured retroactively once the issues are decided on the merits. *Hough v. Weber*, 202 Ill. App. 3d 674 (1990). An “adequate remedy at law is one which is clear, complete and as practical and efficient to the ends of justice and its prompt administration as the equitable remedy.” *Cross Wood Products, Inc. v. Suter*, 97 Ill. App. 3d 282, 286 (1st Dist. 1981). Furthermore, where injuries are of a continuing nature, remedies at law are inadequate, and injunctions should be imposed. See *Fink v. Board of Trustees of Southern Illinois University*, 71 Ill. App. 2d 276, 281 (5th Dist. 1966).

As a result of this legislation, the rights of Respondents to engage in the delivery, sale, import, or purchase an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge and/or manufacture, deliver, sell, or purchase large capacity ammunition feeding devices as they might choose is restrained by 720 ILCS 5/24-1.09 *et seq.* and 720 ILCS 5/24-1.10 *et seq.* The losses are not easily, if at all, quantifiable as a remedy at law.

IV. Respondents have shown a likelihood of at least one of the following.

a. Single Subject Rule

What is the subject of this bill? The mere fact this question is uncertain at best should leave the Court to conclude the Petitioners have raised at least a likelihood of success at this stage. The Petitioners are all over the place with unsubstantiated conjecture as to what is the subject of this bill. It is worth noting Defendant Welch and Defendant Harmon did not appear and provide any sworn testimony as to the subject of this bill. In the unverified response to the request for restraining order, and in its filing in this Court, the Petitioners refer to a regulation regarding firearms. Nothing in the public records supports this was in fact the subject of the legislation. What this Court must consider is the record before it. The dearth of a legislative record was attached to the verified pleadings of Respondents in the circuit court for which the Petitioners provided nothing additional.

In that record, the bill as introduced was an act concerning regulation addressing the insurance code. In that record, the bill as it passed out of the general assembly was still titled an act regarding regulation which no longer addressed insurance, but the bill now dealt with the Illinois State Police shall conduct other investigations of human trafficking, illegal drug trafficking, and illegal firearms trafficking, amended the FOID act to allow a plenary firearms restraining order of up to one-year, but not less than 6 months, added all the provisions regarding restrictions of certain firearms, and amended the freedom of information act. Nowhere in the factual record can the Court find anything substantiating the subject is an act regarding regulation of firearms. The only place that exists in this record is from the unverified conjecture of Petitioners. It seems the Petitioners abandon the public record which states merely it's an act regarding regulation while providing no other substantive information for this Court to consider and tries to create a red-herring that the bill is really about firearm regulation. While the title alone is not dispositive, there is no additional legislative record to rely upon given the procedural abuses complained of herein. .

Petitioners try to aver the end result of the regulation concerns matters of firearms

regulations so that alone satisfies the single subject rule. The Petitioner cites the *Wirtz* case to defend itself against the single subject argument. (See *Wirtz v. Quinn*, 2011 IL 111903, 953 N.E.2d 899, 352 Ill.Dec. 218 (2011). It is true the *Wirtz* court states not to rely solely on the title of the act alone as it relied heavily on the extensive legislative debate to determine the subject. See *Wirtz*, 352 Ill.Dec. at 229. The *Wirz* court further distinguished the *Olender* court which found a violation of the single subject rule as in that case the public record was devoid of any in-depth discussion. *Id.* at 230. This case is more like *Olender* than *Wirtz*. In this case, there is no legislative record to determine if the legislator vetted the bill as something other than merely an act regarding regulation. In this case, there was not adequate consideration by the legislature for which the Court might deduce another subject being considered. As such, with this record, the subject of an act regarding regulation is what the Court has in front of it and that subject is overly broad and must fail in regard to the first step of analyzing the single subject rule

Should the Court get to step two, the Petitioners try and convince this Court that drug trafficking and human trafficking often involve weapons as a basis for combining these investigative requirements upon the Illinois State Police in an act allegedly concerning firearms regulation. No evidence is offered to support such a proposition and nothing is in the public record. Additionally, how does amending the FOID Act to allow for a plenary order of protection further the alleged subject of firearm regulation. While these amendments might address issues of public safety, such is not the alleged subject according to Petitioners. These amendments have no natural or logical connection to firearms regulations which means the Respondents have shown a fair likelihood of success in this regard as well.

Lastly, this act began a modification of the insurance code. It passed the house of representative as an insurance law amendment. Then with two days left in the senate, the bill was

altered into what is in front of the Court today. The bill which left the senate and returned to the house has a subject, or subjects, which bear no relation to the subject for which the bill left house. Insurance contracts and firearms regulations are wholly unrelated. There is absolutely no doubt had the legislature left the insurance amendment intact and passed the law with the senate amendments included, the bill would fail under single subject. Here the Petitioners stripped the insurance provisions out. Nonetheless, the Court should find the single subject rule is still violation as allowing the legislature to strip the original subject at the last minute as a work around to the single subject rule would render the constitutional provision meaningless. To allow such gamesmanship strips the people's elected representatives from being able to engage in fully structured and well-informed debate. *People v. Cervantes*, 189 Ill. 2d 80, 83-84 (1999) (citing *People v. Reedy*, 295 Ill. App. 3d 34 (2d Dist. 1999)).

b. Three Readings Rule

There is no doubt with the record in front of this Court Three Readings Rule has been violated. It shouldn't surprise the Court that Speaker Welch and President Harmon have yet to appear and file any verified response controverting the allegations. Each certified the procedural requirements, including the three readings rule, were complied with before sending HB 5471 to the Governor for signature. Petitioners come to this Court and proclaim it doesn't matter if there has been a violation as there is nothing the Court or Respondents can do about it. Their positions are almost one of arrogance that proclaims an acknowledge the requirements were violated but nonetheless the Court is precluded from addressing it. The Petitioners proclaim only the Illinois Supreme Court can revisit this matter and not a lower court.

In *Geja's Cafe v. Metro. Pier & Exposition Auth.*, 153 Ill. 2d 239, 260 (1992), the Supreme Court explained that, "if the General Assembly continues its poor record of policing itself, we reserve

the right to revisit this issue on another day to decide the continued propriety of ignoring this constitutional violation.” In *Friends of Parks v. Chicago Park Dist.*, 203 Ill. 2d 312, 329 (2003), the Illinois Supreme Court once reiterated this concern, citing previous instances where it “noted . . . that the legislature had shown remarkably poor self-discipline in policing itself in regard to the three-readings requirement.” The Supreme Court went on to say while separation of powers concerns militates in favor of the enrolled-bill doctrine, our responsibility to ensure obedience to the constitution remains an equally important concern. *Id.*

When the Illinois Supreme Court refers to the separation of powers, they are obviously talking about the judiciary and the legislature. The judiciary clearly has the authority to demand obedience to the Three Readings Rule of the Illinois Constitution and the Illinois Supreme Court made that clear. The circuit court and this Court are a part of that judiciary and clearly the Illinois Supreme Court left the door open for the judiciary to intervene in the continued violations of the Three Readings Rule and as Judge Morrison stated, “the time is now.”

c. Procedural Due Process

Both the federal and state constitutions provide that no individual shall be deprived of life, liberty, or property without the due process of law. U.S. Const., amend. XIV, § 1; Ill. Const. 1970, art. I, § 2. Where the right infringed upon is among those rights considered fundamental constitutional rights, the challenged statute is subject to strict scrutiny analysis. In re A.C., 2016 Il App (1st) 153407. Petitioners accurately state the Respondents are due no more than the legislative process itself. This is in fact all the Respondents demand. They demand the legislative process comply with the procedural requirements of the Illinois Constitution, particularly the single subject rule and the three readings rule.

The Petitioners aver a constitutional challenge raised under one theory cannot be supported by decisional law based purely on another provision. *People v. Patterson*, 2014 IL 115012 (2014). This is not what the Respondents are doing. The Respondents are not relying on up decisional law of the Single Subject Rule or the Three Readings Rule to support their procedural due process claims. In fact, that is what the Petitioners are trying to do in that they are trying to defeat the Respondents procedural due process claim by referring to the decisional law of the Single Subject Rule and the Three Readings Rule. Respondents agree this is inappropriate and their procedural due process claim must rise or fall on its own merits.

The procedural requirements of the Single Subject Rule or the Three Readings Rule ensure the Respondents, individually or through their elected representatives, have a meaningful opportunity to notice, to participate, and to be heard. HB 5471 spent 347 days in the legislature. For 345 days this bill was an innocuous change to the insurance code. Within the last 2 days of its life, the insurance amendment was gutted and replaced and converted to an extensive infringement on a fundamental right. The amendment was initiated on Sunday, January 08, 2023, at 3:00 P.M. By Tuesday evening, January 10, 2023, it was signed into law. Before the public even knew what is going on, the bill was passed. No reasonable person could conclude the Respondents, or their elected representatives, had any meaningful opportunity to engage in the legislative process as demanded by the procedural requirements of the constitution. Under no set of facts does this procedural gamesmanship comport with the constitutionally guaranteed rights of due process of law.

d. Equal Protection

The constitutional guarantee of equal protection requires that the government treat similarly situated individuals in a similar manner. *People v. Warren*, 173 Ill.2d 348, 361, 219 Ill.Dec. 533, 671 N.E.2d 700 (1996). The analysis applied in assessing equal protection claims is the same under both

the United States and Illinois Constitutions. *Nevitt v. Langfelder*, 157 Ill.2d 116, 124, 191 Ill.Dec. 36, 623 N.E.2d 281 (1993). It does not preclude the State from enacting legislation that draws distinctions between different categories of people, but it does prohibit the government from according to different treatment to persons who have been placed by a statute into different classes on the basis of criteria wholly unrelated to the purpose of the legislation. *Id.*

There are no facts in the record to even begin to support an argument in favor of the Petitioners which might justify exempting out the seven large categories of persons. While the Petitioners attempt to argue it's the "extensive" training of these individuals which justifies their exemption, that is pure conjecture at this stage of the proceedings. No facts in the legislative record exists to make this argument and no affidavits, or other verified facts, have been adduced in these proceedings to make this argument. Quite simply, the Petitioners have zero ability to make that argument at this stage. However, just for short measure, the Respondents will briefly evaluate the extensive training proposition. This brief evaluation will show the Court that training likely has nothing to do with exempting these groups.

Any private security contractor who is licensed and has been issued a firearm control card under the Private Detective, Private Alarm, Private Security, Fingerprint Vendor, and Locksmith Act of 2004 while performing official duties is exempt. (See 720 ILCS 5/24-1.9(e) and See 720 ILCS 5/24-1.10(e).) The training requirements to be issued a firearm control card are as follows: Registered employees of the private alarm contractor agency who carry a firearm and respond to alarm systems shall complete, within 30 days of their employment, a minimum of 20 hours of classroom training provided by a qualified instructor and shall include all of the following subjects: (1) The law regarding arrest and search and seizure as it applies to the private alarm industry; (2) Civil and criminal liability for acts related to the private alarm industry; (3) The use of force, including

but not limited to the use of nonlethal force (i.e., disabling spray, baton, stun gun, or similar weapon); (4) Arrest and control techniques; (5) The offenses under the Criminal Code of 2012 that are directly related to the protection of persons and property; (6) The law on private alarm forces and on reporting to law enforcement agencies; (7) Fire prevention, fire equipment, and fire safety; (8) Civil rights and public relations; (9) The identification of terrorists, acts of terrorism, and terrorist organizations, as defined by federal and State statutes. (See 225 ILCS 447/20-20(a)) Nowhere to be found in the requirement to obtain a firearms control card is any training whatsoever regarding firearms. With training whatsoever, he or she is free to purchase as many “assault weapons, .50 caliber rifles and ammunition, and high-capacity magazines as desired as long as he or she has a valid firearms control card which requires no firearms training under the Private Detective, Private Alarm, Private Security, Fingerprint Vendor, and Locksmith Act of 2004. This classification couldn’t even survive rational basis, let alone strict scrutiny.

Retired law enforcement officers are free to purchase as many “assault weapons, .50 caliber rifles and ammunition, and high-capacity magazines as desired but retired navy seal, being one of the most highly trained warriors on the planet, loses his rights upon being discharged. Is a retired police officer better trained than a navy seal? Of course not. This further supports training has nothing to do with these exempt classes.

As for these exempt categories, the record is devoid of what training they undergo exactly which adequately trains them in regard to “assault weapons” and .50 caliber rifles, or large capacity magazines, which training Respondents cannot also undergo? If training is in fact the standard, then Respondents should be afforded the same opportunity to undergo this training to be afforded the same privileges as the exempt class. This argument is for another time as for now the Petitioners argument must fail as there are no facts in the record to support their training argument. Especially in light of

the fact that the Court can look at the private security contractor statute and see that in fact no training is required for any weapons, let alone “assault weapons.” As such, Respondents have easily shown a likelihood of success on the merits as to equal protection. Under no set of facts can these exempt categories survive a strict scrutiny analysis, and given the absence of any facts at this stage of the proceedings, even rational basis could not be overcome.

CONCLUSION

The Court has in front of a record which due to the complete abandonment of the legislative process as complained of by the Respondents contains no factual basis for which any of the arguments made by the Petitioners can be supported. Petitioners come to this Court freewheeling with self-serving factual assertions regarding the subject being regulated as well as the factual basis supporting its decision to exempt large groups. The only facts in the record have been adduced by the Respondents and the Petitioners failure to plead any verified facts, or otherwise provide any affidavits, leaves them wanting of any factual basis to support their claims.

The Respondents have more than satisfied at this stage the four elements of a temporary restraining order. They have a right to object to legislation passed in violation of constitutional principles which has impeded their ability to possess or otherwise desire to deliver, sell, import, or purchase an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge and/or manufacture, deliver, sell, or purchase large capacity ammunition feeding devices. Every day which this right is interfered with is irreparable and no amount of money can compensate them for this harm. Respondents have raised a likelihood of success on the merits of at least one of the four constitutional violations raised.

Prior to the enactment of this legislation, Plaintiffs were not restricted in their rights to possess or otherwise desire to deliver, sell, import, or purchase an assault weapon, assault weapon

attachment, .50 caliber rifle, or .50 caliber cartridge and/or manufacture, deliver, sell, or purchase large capacity ammunition feeding devices. After this legislation was enacted in less than 48 hours, without any meaningful opportunity for the Plaintiffs or their elected representatives to be heard, their fundamental rights were restricted notwithstanding large categories of exempt persons who enjoy the benefit of powerful lobbyists were allowed to keep their rights intact. As such equity demands the Respondents, while these proceedings are pending, be treated the same as the exempt classes of citizens not impacted by this law.

Plaintiffs-Appellees,

/s/ Thomas G. DeVore

By: Their Attorneys

Thomas G. DeVore

IL Bar Reg. No. 06305737

118 N. 2nd St.

Greenville, IL 62246

tom@silverlakelaw.com

CERTIFICATE OF SERVICE

I certify that on January 25, 2023, I electronically filed the foregoing Plaintiffs-Appellees Response to Defendants-Appellants Petition for Review of Temporary Restraining Order Pursuant to Il. Sup. Ct. R. 307(d), with the Clerk of the Appellate Court of Illinois Fifth District, by using the Odyssey eFileIL system.

I further certify that the other participants in this case, named below, are registered service contacts on the Odyssey eFileIL system, and thus will be served via the Odyssey eFileIL system. As a courtesy, the other participants also will be served via e-mail.

Leigh J. Jahnig
Civilappeals@ilag.gov
Leigh.Jahnig@ilag.gov

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.

/s/ Thomas G. DeVore

Thomas G. DeVore
IL Bar Reg. No. 06305737
118 N. 2nd St.
Greenville, IL 62246
tom@silverlakelaw.com