

APPEAL TO THE SUPREME COURT OF ILLINOIS

**FROM THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS**

PIASA ARMORY, LLC,

Plaintiff,

v.

No. 2023 LA 1129

KWAME RAOUL, in his official capacity
as Attorney General of the State of Illinois,

Defendant.

NOTICE OF CROSS APPEAL

Comes now Plaintiff Piasa Armory, LLC, by and through its attorneys, Thomas G, Maag and the Maag Law Firm, LLC, and in response to the Notice of Appeal, filed by Defendant on March 13, 2023, SUBMITS ITS NOTICE OF CROSS APPEAL of the order of the trial court dated March 4, 2024, and, as instructed in *Caulkins v. Pritzker*, 2023 IL 129453 (Ill 2023), cross appeals from the denial by the trial court of Plaintiff's arguments related to the 3 readings rule of the Illinois Constitution (Article IV, Section 8), in order to preserve the arguments on appeal, and respectfully requests this Honorable Court reverse the trial court, to the extent that it found Section 2-101.5(a), also known as HB3062, did not violate the three readings rule of the Illinois Constitution, and in said process, hold said act unconstitutional in its entirety, as opposed to merely as applied, and as such, overrule such precedent as *Friends of Parks v. Chicago Park district*, 203 Ill. 2d 312, 328-29 (2003), and in the process, *affirm* the ultimate ruling of the trial court in this case denying said motion to transfer and other relief, previously appealed by Defendant, by reversing and vacating the challenge based on the 3 readings rule.

E-FILED
3/18/2024 1:07 PM
CYNTHIA A. GRANT
SUPREME COURT CLERK

Dated: 3-14-2024

Respectfully Submitted,
Piasa Armory, LLC

By/sThomas G. Maag
Thomas G. Maag #6272640
Maag Law Firm, LLC
22 West Lorena Avenue
Wood River, IL 62095
618-216-5291
tmaag@maaglaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed using electronic means, which will send notifications to the following:

Darren Kinkead
Darren.kinkead@ilag.gov

Date: 3-14-2024

s/Thomas G. Maag