

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

RACHEL HENRICHS, REID HENRICHS,)
GUN OWNERS OF AMERICA, INC., and)
GUN OWNERS FOUNDATION)

Plaintiffs,)

Civil Action No. _____

v.)

BRENDAN KELLY, in his Official)
Capacity as Director of the Illinois State)
Police, and KWAME RAOUL, in his)
Official Capacity as Attorney General of)
Illinois)

Defendants.)
_____)

DECLARATION OF ERICH M. PRATT

1. My name is Erich M. Pratt. I am a U.S. citizen and resident of Virginia. I make this declaration in support of Plaintiffs’ Complaint for Declaratory and Injunctive Relief. Unless otherwise stated, I make this declaration based on personal knowledge. If called as a witness, I can testify to the truth of the statements contained herein.

2. I am the Senior Vice President of Gun Owners of America, Inc. (“GOA”), and the Senior Vice President of Gun Owners Foundation (“GOF”).

3. In my capacity with GOA and GOF, I oversee staff that is in daily contact with members and supporters regarding their concerns, questions, requests, and suggestions on how GOA and GOF can best represent their interests.

4. Gun Owners of America, Inc. is a California non-stock corporation with its principal place of business in Springfield, Virginia. GOA is organized and operated as a nonprofit membership organization that is exempt from federal income taxes under Section 501(c)(4) of the U.S. Internal Revenue Code. GOA was formed in 1976 to preserve and defend the Second Amendment rights of gun owners. GOA has more than 2 million members and supporters across the country, including many who live outside of Illinois and whose state laws on carrying firearms have not been deemed to be “substantially similar” to Illinois, and thus, who are not allowed to even apply for a license to carry in Illinois. Many of these members are and will be irreparably harmed by Illinois’ refusal to allow them to carry a concealed handgun in Illinois.

5. Gun Owners Foundation is a Virginia non-stock corporation with its principal place of business in Springfield, Virginia. GOF is organized and operated as a nonprofit legal defense and educational foundation that is exempt from federal income taxes under Section 501(c)(3) of the U.S. Internal Revenue Code. GOF is supported by gun owners across the country, including many who live outside of Illinois and whose state laws on carrying firearms have not been deemed to be “substantially similar” to Illinois, and thus, who are not allowed to even apply for a license to carry in Illinois. Many of these supporters are and will be irreparably harmed by Illinois’ refusal to allow them to apply for a license to carry in Illinois.

6. GOF funds its litigation efforts, in part, by way of individual contributions, along with contributions received from individuals through the Combined Federal Campaign. GOF’s supporters provide the funds directly used to support GOF’s litigation efforts, which efforts would be impossible without contributions from our supporters. Our supporters contribute to GOF specifically so that we can bring litigation like this. As part of keeping its supporters up to date on this and other litigation, and various other Second Amendment topics, GOF provides its supporters

with a newsletter which provides updates directly to them, keeping them advised of what GOF is doing. I also am a financial supporter of GOF, as I personally contribute funds to GOF to further its mission.

7. GOA and GOF's members and supporters desire and overwhelmingly support our involvement in litigation to protect their right to publicly carry firearms, a right that is being unconstitutionally infringed by Illinois' ongoing refusal to allow them to even apply.

8. As noted, GOA and GOF together have more than two million members and supporters nationwide, including many within this district.

9. GOA and GOF have been in contact with a number of members and supporters nationwide, including individuals such as Plaintiffs Rachel Henrichs and Reid Henrichs, who wish to apply for a license to carry a firearm in Illinois, but are unable to.

10. One GOA member and former Navy SEAL, Carl Higbie, lives in Connecticut and travels to Illinois at various times. Mr. Higbie has a license to carry issued by the State of Connecticut and a license to carry issued by New York City. From time to time, Mr. Higbie travels to Great Lakes, Illinois to attend Navy Boot Camp graduation. However, because Mr. Higbie resides in Connecticut, he is unable to even apply for an Illinois license to carry, and Illinois does not recognize any of Mr. Higbie's other carry permits. If Illinois would accept an application from him, Mr. Higbie would apply and, because he meets all of the standards besides the "substantially similar" standard, Mr. Higbie would be issued a license to carry.

11. Another GOA member, Richard Hughes, lives in Florida. Mr. Hughes has a license to carry issued by the State of Florida. Mr. Hughes likewise travels to Illinois to visit friends and family, and recently returned from a trip to Illinois, where he made the drive to and from Illinois by car. However, Mr. Hughes was unable to take his firearm with him to Illinois, because Illinois does not

allow Florida residents to apply for a license to carry a handgun or provide reciprocity for Florida permits, so Mr. Hughes left his handgun at home before he made the drive. Mr. Hughes therefore was forced to make the drive without any means with which to defend himself or his family. If allowed to apply for an Illinois license to carry, Mr. Hughes would apply and, because he meets all of the standards besides the “substantially similar” standard, Mr. Huges would be issued a license to carry.

12. Sheryl Decasse, a GOA member from New Jersey, also wishes to apply for a license to carry in Illinois. Mrs. Decasse has a license to carry issued by the State of New Jersey, and visits Illinois from time to time, including to attend graduation ceremonies in Great Lakes, Illinois for United States Navy Boot Camp. In fact, recently Mrs. Decasse and her husband visited Great Lakes, Illinois, but since she was unable to even apply for a license to carry in Illinois and Illinois refuses to recognize her Ner Jersey permit, she had to leave her firearm at home in New Jersey, rendering her defenseless. If Mrs. Decasse were allowed to apply for a license to carry in Illinois, she would apply and, because she meets all of the standards besides the “substantially similar” standard, Mrs. Decasse would be issued a license to carry.

13. Micah Young, a GOA member from Michigan, also seeks a license to carry in Illinois. However, Mr. Young is unable to apply for a license to carry in Illinois because Michigan is not listed as one of the six “substantially similar” states, and because Illinois does not grant reciprocity to Mr. Young’s Michigan permit. Mr. Young visits Illinois and, if allowed to apply for a license to carry, would apply and because he meets all of the standards besides the “substantially similar” standard, Mr. Young would be issued a license to carry.

14. Andrew Roberts, a GOA member from Hawaii, attempted to apply for a license to carry via Illinois’ online portal. However, the portal would not allow him to apply for a license to carry

because Mr. Roberts resides in Hawaii. Mr. Roberts explained that he wishes to travel to Illinois, but will not visit Illinois unless he is allowed to exercise his Second Amendment rights. Because Mr. Roberts is unable to even apply for a license to carry from Illinois, he refuses to visit Illinois. If allowed to apply for a license to carry, Mr. Roberts would apply and, because he meets all of the standards besides the “substantially similar” standard, Mr. Roberts would be issued a license to carry.

15. Val Finnell, another GOA member who resides in Pennsylvania, travels to Illinois to attend conferences, but is unable to apply for an Illinois license to carry. Mr. Finnell is a law abiding citizen, and has a valid Pennsylvania license to carry. If allowed to apply for a license to carry in Illinois, he would do so and be issued a license to carry. Alternatively, if Illinois accepted Mr. Finnell’s Pennsylvania-issued license to carry, he would utilize his Pennsylvania license to carry while carrying his firearm in Illinois.

16. GOA and GOF have thousands of members and supporters like these individuals, who have been, are being, and will be irreparably harmed by Illinois’ refusal to allow them to apply for an Illinois carry permit or otherwise grant reciprocity to these persons’ out of state permits.

I, Erich M. Pratt, declare under penalty of perjury that the foregoing is true and correct.

3/13/2026
DATE


ERICH M. PRATT