

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RHONDA EZELL, et al.,)	Case No. 10-C-
)	
Plaintiffs,)	DECLARATION OF CHRIS HART
)	
v.)	
)	
CITY OF CHICAGO,)	
)	
Defendant.)	
)	
)	
)	

DECLARATION OF CHRIS HART

I, Chris Hart, am competent to state, and declare the following based on my personal knowledge:

1. I am the Midwest Range Consultant for Action Target, Inc.
2. Action Target, Inc., is a Delaware corporation having its primary place of business in Utah. Action Target is a leading designer and builder of gun ranges, and renowned manufacturer and seller of gun range equipment and supplies. Action Target is engaged in the gun range business throughout the United States.
3. Commercial gun ranges open to the public exist throughout the United States, and in virtually every major American city.
4. As part of my duties, I coordinated Action Target's recent construction of a three-position rifle-rated gun range on the seventeenth floor of the Federal Reserve Bank of Chicago building, located at 230 South LaSalle Street, Chicago, Illinois, and a gun range for the United States Postal Inspectors at 743 South Canal Street, Chicago, Illinois. We have sent estimates for

retrofitting of gun ranges for U.S. Customs and Border Protection, located at 610 South Canal Street, Chicago, Illinois, and for the Federal Air Marshals, next to O'Hare Airport, located at 899 Upper Express Drive, Chicago, Illinois. In 2003, Action Target constructed a range for Brinks, located at 4420 S. Tripp Avenue, Chicago, Illinois.

5. Several Action Target customers have expressed an interest to me in having Action Target build a commercial indoor shooting range within the city limits of Chicago. Action Target would pursue and solicit this work, and build and supply commercial gun ranges within the city of Chicago, were it lawful to do so. I refrain from engaging in the commercial range business in Chicago for fear of arrest, prosecution, fine and imprisonment under the provisions challenged in this lawsuit.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 14 day of August, 2010



Chris Hart