

**UNITED STATES DISTRICT
COURT SOUTHERN DISTRICT OF
ILLINOIS EAST ST. LOUIS
DIVISION**

DAVID MEYER, et al.,)	
)	
Plaintiffs,)	
)	No. 3:21-cv-00518-SMY
v.)	
)	
KWAME RAOUL, et al.,)	
)	
Defendants.)	

**PLAINTIFFS' RESPONSES AND OBJECTIONS TO FAYETTE
AND KENDALL COUNTY DEFENDANTS' FIRST REQUESTS FOR ADMISSION**

Pursuant to Federal Rules of Civil Procedure 26 and 36, Plaintiffs, by their undersigned counsel, hereby serve the following Responses and Objections to the Fayette and Kendall County Defendants' First Requests for Admission.

REQUESTS FOR ADMISSION

Fayette County State's Attorney's Office:

1. Employees or agents of the Fayette County State's Attorney's Office (hereafter, "FC SAO") cannot issue a Firearm Owners Identification Card (FOID Card) under the Firearm Owners Identification Card Act (FOID Card Act), 430 ILCS 65/0.01 *et seq.*

RESPONSE: Admit.

2. Employees or agents of the FC SAO cannot issue a "license" to carry a concealed handgun under the Firearm Concealed Carry Act (FCCA), 430 ILCS 66/1 *et seq.*

RESPONSE: Admit.

3. Employees or agents of the FC SAO have not arrested, detained, threatened to prosecute, or criminally charged plaintiff Meyer for any alleged violation of unlawful use of a

weapon pursuant to 720 ILCS 5/24-1.

RESPONSE: Admit. The FC SAO and its employees and agents have the authority to enforce 720 ILCS 5/24-1. Plaintiff Meyer has not violated 720 ILCS 5/24-1 because he fears enforcement of that law by the FC SAO.

4. Employees or agents of the FC SAO have not arrested, detained, threatened to prosecute, or criminally charged plaintiff Meyer for any alleged violation of aggravated unlawful use of a weapon pursuant to 720 ILCS 5/24-1.6.

RESPONSE: Admit. The FC SAO and its employees and agents have the authority to enforce 720 ILCS 5/24-1.6. Plaintiff Meyer has not violated 720 ILCS 5/24-1.6 because he fears enforcement of that law by the FC SAO.

5. Employees or agents of the FC SAO have not arrested, detained, threatened to prosecute, or criminally charged plaintiff Meyer for any alleged violation of unlawful possession of firearms and firearm ammunition pursuant to 720 ILCS 5/24-3.1.

RESPONSE: Admit. The FC SAO and its employees and agents have the authority to enforce 720 ILCS 5/24-3.1.

Fayette County Sheriff's Office:

6. Employees or agents of the Fayette County Sheriff's Office (hereafter, "FC Sheriff's Office") cannot issue a FOID Card under the FOID Card Act, 430 ILCS 65/0.01 *et seq.*

RESPONSE: Admit.

7. Employees or agents of the FC Sheriff's Office cannot issue a "license" to carry a concealed handgun under the FCCA, 430 ILCS 66/1 *et seq.*

RESPONSE: Admit.

8. Employees or agents of the FC Sheriff's Office have not arrested, detained,

threatened to prosecute, or criminally charged plaintiff Meyer for any alleged violation of unlawful use of a weapon pursuant to 720 ILCS 5/24-1.

RESPONSE: Admit. The FC Sheriff's Office and its employees and agents have the authority to enforce 720 ILCS 5/24-1. Plaintiff Meyer has not violated 720 ILCS 5/24-1 because he fears enforcement of that law by the FC Sheriff's Office.

9. Employees or agents of the FC Sheriff's Office have not arrested, detained, threatened to prosecute, or criminally charged plaintiff Meyer for any alleged violation of aggravated unlawful use of a weapon pursuant to 720 ILCS 5/24-1.6.

RESPONSE: Admit. The FC Sheriff's Office and its employees and agents have the authority to enforce 720 ILCS 5/24-1.6. Plaintiff Meyer has not violated 720 ILCS 5/24-1.6 because he fears enforcement of that law by the FC Sheriff's Office.

10. Employees or agents of the FC Sheriff's Office have not arrested, detained, threatened to prosecute, or criminally charged plaintiff Meyer for any alleged violation of unlawful possession of firearms and firearm ammunition pursuant to 720 ILCS 5/24-3.1.

RESPONSE: Admit. The FC Sheriff's Office and its employees and agents have the authority to enforce 720 ILCS 5/24-3.1.

Kendall County State's Attorney's Office:

11. Employees or agents of the Kendall County State's Attorney's Office (hereafter, "KC SAO") cannot issue a FOID Card under the FOID Card Act, 430 ILCS 65/0.01 *et seq.*

RESPONSE: Admit.

12. Employees or agents of the KC SAO cannot issue a "license" to carry a concealed handgun under the FCCA, 430 ILCS 66/1 *et seq.*

RESPONSE: Admit.

13. Employees or agents of the KC SAO have not arrested, detained, threatened to prosecute, or criminally charged plaintiff Davis for any alleged violation of unlawful use of a weapon pursuant to 720 ILCS 5/24-1.

RESPONSE: Admit. The KC SAO and its employees and agents have the authority to enforce 720 ILCS 5/24-1. Plaintiff Davis has not violated 720 ILCS 5/24-1 because she fears enforcement of that law by the KC SAO.

14. Employees or agents of the KC SAO have not arrested, detained, threatened to prosecute, or criminally charged plaintiff Davis for any alleged violation of aggravated unlawful use of a weapon pursuant to 720 ILCS 5/24-1.6.

RESPONSE: Admit. The KC SAO and its employees and agents have the authority to enforce 720 ILCS 5/24-1.6. Plaintiff Davis has not violated 720 ILCS 5/24-1.6 because she fears enforcement of that law by the KC SAO.

15. Employees or agents of the KC SAO have not arrested, detained, threatened to prosecute, or criminally charged plaintiff Davis for any alleged violation of unlawful possession of firearms and firearm ammunition pursuant to 720 ILCS 5/24-3.1.

RESPONSE: Admit. The KC SAO and its employees and agents have the authority to enforce 720 ILCS 5/24-3.1

Kendall County Sheriff's Office:

16. Employees or agents of the Kendall County Sheriff's Office (hereafter, "KC Sheriff's Office") cannot issue a FOID Card under the FOID Card Act, 430 ILCS 65/0.01 *et seq.*

RESPONSE: Admit.

17. Employees or agents of the KC Sheriff's Office cannot issue a "license" to carry a concealed handgun under the FCCA, 430 ILCS 66/1 *et seq.*

RESPONSE: Admit.

18. Employees or agents of the KC Sheriff's Office have not arrested, detained, threatened to prosecute, or criminally charged plaintiff Davis for any alleged violation of unlawful use of a weapon pursuant to 720 ILCS 5/24-1.

RESPONSE: Admit. The KC Sheriff's Office and its employees and agents have the authority to enforce 720 ILCS 5/24-1. Plaintiff Davis has not violated 720 ILCS 5/24-1 because she fears enforcement of that law by the KC Sheriff's Office.

19. Employees or agents of the KC Sheriff's Office have not arrested, detained, threatened to prosecute, or criminally charged plaintiff Davis for any alleged violation of aggravated unlawful use of a weapon pursuant to 720 ILCS 5/24-1.6.

RESPONSE: Admit. The KC Sheriff's Office and its employees and agents have the authority to enforce 720 ILCS 5/24-1.6. Plaintiff Davis has not violated 720 ILCS 5/24-1.6 because she fears enforcement of that law by the KC Sheriff's Office.

20. Employees or agents of the KC Sheriff's Office have not arrested, detained, threatened to prosecute, or criminally charged plaintiff Davis for any alleged violation of unlawful possession of firearms and firearm ammunition pursuant to 720 ILCS 5/24-3.1.

RESPONSE: Admit. The KC Sheriff's Office and its employees and agents have the authority to enforce 720 ILCS 5/24-3.1.

Dated: November 22, 2022

David G. Sigale (Atty. ID# 6238103)
LAW FIRM OF DAVID G. SIGALE, P.C.
430 West Roosevelt Road
Wheaton, Illinois 60187
(630) 452-4547
dsigale@sigalelaw.com

Respectfully Submitted,

s/David H. Thompson
David H. Thompson*
Peter A. Patterson*
William V. Bergstrom*
COOPER & KIRK, PLLC
1523 New Hampshire Avenue, N.W.
Washington, D.C. 20036
(202) 220-9600

(202) 220-9601 (fax)
dthompson@cooperkirk.com
ppatterson@cooperkirk.com
wbergstrom@cooperkirk.com

*Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2022, I caused the foregoing to be filed served upon counsel of record via email.

David G. Sigale (Atty. ID# 6238103)
LAW FIRM OF DAVID G. SIGALE, P.C.
430 West Roosevelt Road
Wheaton, Illinois 60187
(630) 452-4547
dsigale@sigalelaw.com

s/David H. Thompson
David H. Thompson*
Peter A. Patterson*
William V. Bergstrom*
COOPER & KIRK, PLLC
1523 New Hampshire Avenue, N.W.
Washington, D.C. 20036
(202) 220-9600
(202) 220-9601 (fax)
dthompson@cooperkirk.com
ppatterson@cooperkirk.com
wbergstrom@cooperkirk.com

*Admitted *pro hac vice*

Attorneys for Plaintiffs