

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS  
SPRINGFIELD DIVISION**

KEVIN W. CULP, MARLOW DAVIS, )  
FREDDIE REED-DAVIS, )  
DOUGLAS W. ZYLSTRA, )  
JOHN S. KOLLER, STEVE STEVENSON, )  
PAUL HESLIN, MARLIN MANGELS, )  
GUS C. BROWNE II, )  
JEANELLE WESTROM, )  
SECOND AMENDMENT FOUNDATION, )  
INC., ILLINOIS CARRY and )  
ILLINOIS STATE RIFLE ASSOCIATION, )

Plaintiffs, )

v. )

Case No. 3:14-CV-3320-SEM-TSH

LISA MADIGAN, in her Official Capacity )  
as Attorney General of the State of Illinois; )  
HIRAM GRAU, in his Official Capacity as )  
Director of the Illinois State Police, and )  
JESSICA TRAME, as Bureau Chief of the )  
Illinois State Police Firearms Services )  
Bureau, )

Defendants. )

**DECLARATION OF JULIANNE H. VERSNEL**

I, Julianne H. Versnel, am competent to state, and declare the following based on my personal knowledge:

1. I am the Director of Operations of the Second Amendment Foundation (“SAF”).

2. SAF is a non-profit membership organization incorporated under the laws of Washington with its principal place of business in Bellevue, Washington. SAF has over 650,000 members and supporters nationwide, including thousands in Illinois. The purposes of SAF include education, research, publishing and legal action focusing on the Constitutional right to privately own and possess firearms, and the consequences of gun control.

3. SAF has individual members and supporters who are adversely impacted by 430 ILCS 66/40.

4. But for the criminal enactments challenged in this complaint, SAF members who are non-residents of Illinois, who nonetheless work in, travel to, and spend significant amounts of time within Illinois would apply for concealed carry permits in order to carry concealed firearms for their own defense, but they refrain from carrying concealed firearms for fear of arrest, prosecution, fine and incarceration.

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

Executed this the 1st day of June, 2015.

A handwritten signature in black ink, appearing to read "Julianne H. Versnel". The signature is written in a cursive style with a large initial "J".

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Julianne H. Versnel