

**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 MARLIN MANGELS

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

1. I am a resident of the City of Keokuk, State of Iowa. I possess an Iowa driver's license and an Iowa license to carry a concealed weapon, as well as concealed carry licenses from Utah and Arizona. Keokuk is just across the Mississippi River from Hamilton, Illinois. I frequently ride my bicycle up the River Road in Illinois, eats in restaurants in Hamilton, Illinois, travel to see my wife's

family in the Chicago area, and travel I-80 through Illinois to visit friends in Massachusetts.

2. I am allowed to possess a firearm in Illinois only on my premises, or on someone else's premises with permission, but I am prohibited by 430 ILCS 66/40 from obtaining a concealed carry permit, and thus carrying a handgun in a concealed manner for self-defense.

3. I am otherwise qualified to apply for a concealed carry permit in Illinois, except for 430 ILCS 66/40.

4. I would carry a loaded and functional concealed handgun in public for self-defense, but I refrain from doing so because I fear arrest, prosecution, fine, and imprisonment as I understand it is unlawful for non-residents from Iowa to carry a concealed handgun in Illinois, or even to apply for a license to do so.

5. I am a member of the Second Amendment Foundation, Illinois State Rifle Association, and Illinois Carry.

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

Executed this the 2 day of June, 2015.



Martin Mangels