

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 KEVIN W. CULP

I, Kevin W. Culp, am competent to state, and declare the following based on my personal knowledge:

1. I am a resident of the City of Blairsville, State of Pennsylvania.
2. I am an Air Force Colonel stationed on orders at Scott Air Force Base near Belleville, Illinois, but I am a legal resident of Pennsylvania who possesses a Pennsylvania driver's license and Pennsylvania license to carry a concealed weapon, as well as a concealed carry license from Florida.

3. I possess an Illinois FOID card. I am also a Basic Pistol Instructor and a certified Illinois Concealed Carry Licensing Instructor.

4. I am allowed to possess and carry a firearm in Illinois 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 license, and thus carrying a concealed handgun in public for self-defense.

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

6. 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 Pennsylvania to carry a concealed handgun in Illinois, and I am unable to even apply for a license to do so.

7. 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 20th day of ~~June~~ ^{July}, 2015.



Kevin W. Culp