

**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 RICHARD PEARSON

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

1. I am the Executive Director of the Illinois State Rifle Association ("ISRA").
2. ISRA is a non-profit membership organization incorporated under the laws of Illinois with its principal place of business in Chatsworth, Illinois. ISRA has over 26,600 members and supporters in Illinois, and many members outside the State of Illinois. The purposes of ISRA include securing the Constitutional right to privately own and possess firearms within Illinois, through education, outreach, and litigation. ISRA has bought and is pursuing this action on behalf of itself and its members.

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

4. But for the criminal enactments challenged in this complaint, ISRA 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 licenses 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 2 day of June, 2015.


Richard Pearson