

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 DOUGLAS W. ZYLSTRA

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

1. I am a resident of the City of Munster, State of Indiana. I possess an Indiana driver's license and an Indiana license to carry a concealed weapon, as well as a concealed carry license and instructor certification from Utah. I am an Illinois State Police certified concealed carry instructor working for a firearm training company in Lansing, Illinois.

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 Indiana 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 2nd day of June, 2015.

  
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Douglas W. Zylstra