

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 JOHN S. KOLLER

I, John S. Koller, am competent to state, and declare the following based on my personal knowledge:

1. I am a resident of the City of Castle Rock, State of Colorado. I possess a Colorado driver's license and a Colorado license to carry a concealed weapon, as well as concealed carry licenses from Utah, Nevada and Arizona. I was born and raised in Chicago, Illinois, and still have family in the Chicago area, whom I visit. I also make periodic business trips to 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.

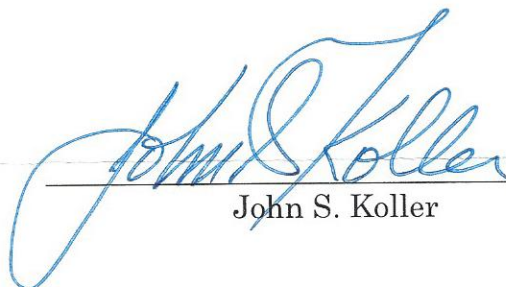
3. I am otherwise qualified to apply for a concealed carry permit in Illinois, except for 430 ILCS 66/40.

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 Colorado 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 3rd day of June, 2015.



John S. Koller