

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
BENTON DIVISION

MARY E. SHEPARD and the ILLINOIS
STATE RIFLE ASSOCIATION,

Plaintiffs,

V.

LISA M. MADIGAN, solely in her official capacity as ATTORNEY GENERAL OF ILLINOIS, GOVERNOR PATRICK J. QUINN, solely in his official capacity as Governor of the State of Illinois, TYLER R. EDMONDS, solely in his official capacity as the State's Attorney of Union County, Illinois, and SHERIFF DAVID LIVESAY, solely in his official capacity as Sheriff of Union County,

Defendants.

No. 3:11-cv-00405-WDS-PMF

Honorable Judge William D. Stiehl

Magistrate Judge Philip M. Frazier

**DECLARATION OF MARY E. SHEPARD
IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

I, Mary Shepard, declare as follows:

1. My name is Ms. Mary E. Shepard and I reside in the town of Cobden in Union County, Illinois. I am 71 years old and five feet, two inches tall.

2. I am a citizen of the United States and a member of the National Rifle Association.

3. I possess a valid Illinois Firearms Owner Identification card and I have no criminal record.

4. I have received training in the safe handling and firing of handguns in five safety and self-defense courses and I hold a certification from each of those courses.

5. I have a valid Illinois Firearm Owner's Identification Card, a true and correct copy of which is attached as Exhibit A.

6. I am licensed to carry a handgun in the State of Florida. Attached as Exhibit B is a true and correct copy of my Florida Concealed Weapons License.

7. I am licensed to carry a handgun in the Commonwealth of Pennsylvania. Attached as Exhibit C is a true and correct copy of my Pennsylvania Concealed Weapons Permit.

8. I have received training in the safe handling and firing of handguns in five safety and self-defense courses and I hold a certification from each of those courses. Attached as Exhibits D through H are true and correct copies of my certifications for successfully completing safety and self-defense course including training in the safe handling and firing of handguns.

9. Those handgun-carry licenses are also recognized in many other states – but not in Illinois.

10. Carrying a firearm in public to protect myself would make me a criminal in my home State of Illinois. Forty-nine states recognize some form of carriage for self-defense, but Illinois law makes carrying a loaded gun a felony.

11. That legal inability to protect myself with a firearm when in public in my home State changed my life forever at 3 p.m. on September 28, 2009.

12. On that afternoon I was viciously attacked by a man who was six feet, three inches tall and weighed 245 pounds. I was performing my duties as treasurer at the First Baptist Church when this man entered the church.

13. He beat me senseless and left me for dead. I sustained four skull fractures, fractures of both cheeks, shattered teeth, a concussion, and crushed vertebrae in my spine when

he beat me with his fists and kicked me once I was on the ground. I suffered two torn rotator cuffs and a mangled arm when he hurled me about my arms.

14. I underwent multiple surgeries, including the reconstruction of my arm, repair of my clavicle, and the rebuilding of four discs in my spine and the placement of surgical screws. I have lost the hearing in my left ear. I was unable to drive for more than a year and a half, and I now suffering blinding, recurrent headaches and other enduring injuries.

15. On this occasion, my assailant also savagely attacked an 84-year-old-woman who was at the church performing custodial duties.

16. A YouTube video containing photographs of me after this assault is available at: http://www.youtube.com/watch?v=B_2JwRo5K4o.

17. If I had been in Pennsylvania or Florida, where I am licensed to carry a firearm for self-defense, or had I been in any of dozens of other states that reciprocally recognize one of my two firearms-carry permits, I would have been armed and could have protected myself. But if I had had my gun with me that day in Union County, the State of Illinois would have treated *me* as the criminal.

18. But for the Illinois ban on carrying a firearm for self-defense, I would have been armed that day and capable of defending myself against a hulking brute twice my size. But Illinois law forbade me from defending myself. Illinois law commanded that I be at the mercy of a thug who just walked into my church and nearly beat me to death.

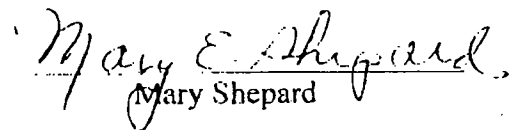
19. I could just as easily have been assaulted on the sidewalk outside the church or car-jacked in my vehicle on my way to church – or any of the other ten thousand public places where other states permit a licensed, trained, law-abiding citizen to carry a gun for self-defense,

but here Illinois law mandates that even elderly ladies who are five-foot-two must go about defenseless and unarmed.

20. I live in fear, in each and every waking moment, that I may be attacked in public again. If the sanctity of God's House in a peaceful town in the middle of the afternoon is not safe, then no place is. The Lord gave me the good sense to take precautions and to take responsibility for my own safety, and I have done just that by purchasing a firearm and taking instruction in five separate firearms courses. But Illinois law forbids me to carry the only instrument of self-defense that would give me a fighting chance against criminal predators like the man who attacked me and the other elderly lady in our church.

21. If the Illinois law were struck down or repealed, I would carry my firearm for self-defense. Without that legal right, which I believe to be not only my constitutional right under the Second Amendment, but also my natural right as a human being, I live in mortal fear and I am irreparably harmed every time I set foot out of the front door of my home.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Mary Shepard

Dated this 8th day of August, 2011.

EXHIBIT “A”

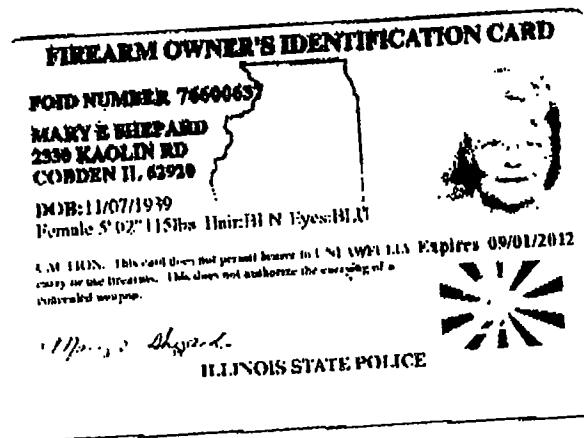


EXHIBIT “B”

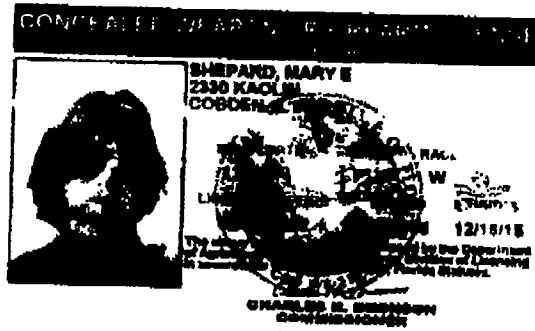


EXHIBIT “C”

| SP 4 12B (10-2007) PENNSYLVANIA LICENSE TO CARRY FIREARMS Valid until expiration date indicated unless revoked. | | | | <input checked="" type="checkbox"/> NEW <input type="checkbox"/> RENEW <input type="checkbox"/> DUPLICATE | | NO. 14029142 | |
|---|--|------------------------------|--|--|---------------|------------------------------------|--------------------|
| 3. DOB 11/07/39 | | 4. DATE ISSUED 11/13/2008 | | 5. DATE EXPIRES 11/13/2013 | | 6. REASON TO CARRY Self-Defense | |
| 7. SSN XXX-XX-XXXX | | | | 8. HGT 502 | 9. WGT 115 | 10. EYES Blue | 11. HAIR Blonde |
| 12. SEX F | | 13. RACE W | | 14. U.S. CITIZEN <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | | 15. COUNTRY OF CITIZENSHIP USA | |
| 16. IMMIGRATION ID NUMBER (IF APP) | | | | 17. SIGNATURE OF LICEN-SEE <i>Mary E. Shepard</i> | | | |
| 18. SIGNATURE OF ISSUING AUTHORITY <i>Mary E. Shepard</i> | | | | 19. SHERIFF OR CHIEF OF POLICE Centre County | | | |
| (LAST) Shepard | | (FIRST) Mary | | (MIDDLE) Elizabeth | | (JR, ETC) | |
| 20. ADDRESS 2330 Kaolin Road Cobden IL 62920 | | | | | | | |

EXHIBIT “D”

Aug.05.2011 03:00 AM

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THE NATIONAL RIFLE ASSOCIATION OF AMERICA

Awards this certificate to

Mary E. Shepard

for successful completion of the

FIRST STEPS PISTOL ORIENTATION

Glock 19 July 23, 2008

Date

Model Firearm

NRA Secretary

NRA Certified Instructor

36382152

NRA ID #

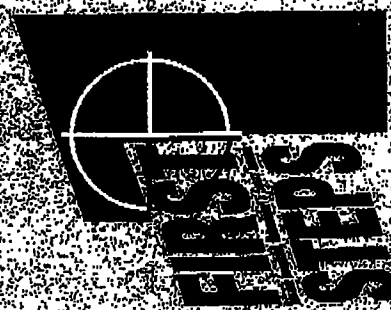


EXHIBIT “E”

NATIONAL RIFLE
ASSOCIATION OF AMERICA

Mary Shapiro

has completed training in the basics of

Pistol

Mike Carlson

Instructor

1/15/09

Date

EXHIBIT “F”

Aug.05.2011 03:00 AM

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**THE NATIONAL RIFLE
ASSOCIATION OF AMERICA**

Awards this certificate to

Mary E. Shepard

for successful completion of the
**FIRST STEPS
PISTOL ORIENTATION**

Glock 19 July 23, 2008

Date

Model firearm

Edward J. Landry
NRA Secretary

NRA Certified Instructor

36382152

NRA ID #



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EXHIBIT “G”

Aug. 05. 2011 03:01 AM

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John A. Logan College
CARTERVILLE, ILLINOIS 62918
This is to certify that

MARY E. SHEPARD

2330 KAOLIN RD.

COBDEN, IL 62920

has satisfactorily completed a specialized course of instruction in

DEFENSIVE SHOOTING FOR MEN AND WOMEN (BASIC)(ACE 232 01)

This Certificate of Participation is awarded this 29 TH *day*

of JULY, 20 08

Bruce R. Hancock

Associate Dean for Community Education

Larry V. Robert Olson
Instructor

EXHIBIT “H”

Aug. 05, 2011 03:01 AM

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