

EXHIBIT A

IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT
COOK COUNTY, ILLINOIS

RECEIVED

APR 16 2014

Steven Charles Thomas,
Plaintiff,

vs.

The Illinois Department of State Police,

Defendant.

14-MR-

2014CH06237
CALENDAR/ROOM 14
TIME 00:00
Admin Review

Firearms Services Branch
Illinois State Police

ADMINISTRATIVE REVIEW COMPLAINT

Comes now, Plaintiff, Steven Charles Thomas, and complains of the Defendant pursuant to 735 ILCS 5/3-104 and 430 ILCS 66/87, inter alia, and in support of said Complaint states as follows:

1. The Plaintiff is Steven Charles Thomas of Address, 475 Glenview Road, Buffalo Grove, IL 60089.
2. The Defendant is The Illinois Department of State Police, Division Administration, 801 South Seventh Street, Suite 400-M, Springfield, IL 62703, hereinafter referred to as "ISP."
3. Plaintiff submitted a complete application to the ISP for a concealed carry license, together with the requisite fees, documentation, and optional Livescan fingerprints. Plaintiff meets all requirements of 430 ILCS 66/25. Attached is a printout of the online application detail from the ISP website. (See attached Exhibit A).
4. On March 22, 2014 Plaintiff received the attached denial letter dated March 19, 2014 from the ISP which purports to deny Plaintiff's application on the basis of 430 ILCS 15(a), a nonexistent provision of the Illinois Health Policy Center Act. (See attached Exhibit B).
5. Presumably, the ISP intended to cite a relevant statute, such as 430 ILCS 66/15(a), in denying Plaintiff's application.
6. Specifically, the ISP claims it has denied Plaintiff a License on the grounds that Plaintiff poses a danger to himself, others, or is otherwise a threat to public safety, as determined by the Review Board.
7. Plaintiff has met all requirements of 430 ILCS 66/10, thereby triggering the requirement that "The Department *shall* [emphasis added] issue a license to carry a concealed firearm under this act..."

NORTHY BROOKLYN CLERK

CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT COOK COUNTY, ILLINOIS

2014 APR 11 AM 10:12


FILED - 5

8. Jurisdiction lies in this court for this appeal based on 430 ILCS 66/87 under the auspices of the Administrative Review Law (735 ILCS 5/3-101 et seq.).
9. Plaintiff specifically asserts that he is not a threat to himself or others and does not otherwise present a threat to public safety, contrary to the Board's determination.
10. The Firearm Concealed Carry Act provides, inter alia, that "[a]ll Board decisions and voting records shall be kept confidential and all materials considered by the Board shall be exempt from inspection except upon order of a court" (see 430 ILCS 66/20(d)).
11. In the absence of an opportunity to examine such materials allegedly relied upon by the Board, Plaintiff is effectively denied the right to challenge the decision of the Board and lodge an effective appeal resulting in a violation of due process under the Illinois Constitution and the United State's Constitution.
12. Filed together with this complaint is an affidavit as required by 735 ILCS 5/3-105. The Clerk is hereby requested to issue and serve summons upon the administrative agency as required by the statute.

WHEREFORE, Plaintiff requests the following relief:

- A) An Order requiring the Board to turn over copies of all materials and objections considered or received in the denial of Plaintiff's application to Plaintiff and the Court in advance of any hearing on the merits of this petition;
- B) A hearing in the Circuit Court on the merits of the Board's decision and the resultant denial of Plaintiff's license as described above;
- C) An order requiring the ISP to issue Plaintiff a Concealed Carry License in connection with the provisions of the Firearm Concealed Carry Act (430 ILCS 66/1 et seq.).

Plaintiff



Steven Charles Thomas
477 Glendale Rd, Buffalo Grove, IL 60089
(847) 537-3681

Application

Page 1 of 1

Exhibit A

Welcome Steven C Thomas | [Sign Out](#)

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APR 16 2014

Firearms Services Bureau
Illinois State PoliceApplication Detail [back](#)Application #: 0000000000
Submitted: 1/12/2014 Denied

Gender: Male

Height: 5'8"

Weight: 150

Applicant: Steven Charles Thomas

Previous Names: None

Date of birth: [REDACTED]

Place of birth: IL

Race: White

Hair Color: Blond Or Strawberry

Eye Color: Blue

Fingerprint TCN #: [REDACTED]

US Citizen: Yes

State of Residence: IL

Contact info: [REDACTED]

FOID Number: [REDACTED]

ID Type: Driver's/Operator's License

ID Number: [REDACTED]

State: IL

Addresses

From	To	Address	City	State	Zip	County	Country
06/1997	Present	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Cook	US

Uploaded Documents



CCW Training Certificate.jpg (119737)

Criminal History Questions

- No** Have you ever been found guilty of a felony?
- No** Within the past 5 years (preceding the date of this application), have you been convicted or found guilty in this State or any other state of a misdemeanor involving the use or threat of physical or violent to any person?
- No** Within the past 5 years (preceding the date of this application), have you been convicted of a battery, assault, aggravated assault, violation of an order of protection, or a substantially similar offense in which a firearm was used or possessed?
- No** Have you ever been convicted of domestic battery (felony or misdemeanor), aggravated domestic battery or a substantially similar offense?
- No** Have you ever been adjudicated a delinquent minor for the commission of an offense that if committed by an adult would be a felony?
- No** Are you currently the subject of pending arrest warrants, prosecution, or proceeding for an offense or action that could lead to the disqualification to own or possess a firearm?
- No** Are you currently the subject of an existing Order of Protection or No Contact/No Stalking Order?
- No** Within the past 5 years (preceding the date of this application), have you been in residential or court-ordered treatment for alcoholism, alcohol detoxification, or alcohol treatment?
- No** Within the previous year, have you failed a drug test for a drug for which you did not have a prescription?
- No** Within the past year (preceding the date of this application), have you used or been addicted to any controlled substance or narcotics in violation of state or federal law?
- No** Are you a medical marijuana patient registry card holder?
- No** Within the past 5 years (preceding the date of this application) have you been convicted or found guilty in this State or any other state of 2 or more violations related to driving while under the influence of alcohol, other drug or drugs, intoxicating compound or compounds, or any combination thereof?
- No** Within the past 5 years (preceding the date of this application), have you been a patient in a mental institution or any part of a medical facility for the treatment of mental illness?
- No** Have you ever been adjudicated by a court as a mental defective or ordered by a court, board or authorized entity to an in-patient or out-patient mental health?
- No** Are you intellectually or developmentally disabled?

Agency Name Goes Here

Page 1 of 1

Person Information

Name: THOMAS, STEVEN C

Aliases:

SSN: [REDACTED]

DOB: [REDACTED]

Gender: Male

Race: Caucasian/Latino

Height: 5' 08"

Weight: 150

Eye Color: Blue

Hair Color:

**Transaction Information**

TCN: [REDACTED]

Type of Transaction: Fee Applicants

Priority:

Transaction Date: 01-12-2014

Originating Agency: LSGTG0000
Gat Training Group

Agency Case No.:

Destination Agency: IL0998900

Attention Indicator:

Date Fingerprinted: 01-12-2014

Send Copies To:

Identification Information

Place of Birth: Illinois

Residence: [REDACTED]

Photo Available:

Palm Prints Available:

FBI Number:

State ID Number:

Miscellaneous ID #:

Basis For Caution:

Drivers License #: [REDACTED]

Drivers License State:

Scars/Marks/Tattoos:

Application InformationPurpose For CCW - CONCEALED CARRY
Submission: WEAPON

Certificate/ License #:

Cost Center: 5111

Send To FBI: FBI and ISP

GAT TRAINING GROUP, LLC
970 DUNDEE AVE, EAST DUNDEE IL 60118
PHONE #847-428-4867

My signature authorizes the Illinois State Police and if necessary the FBI, to verify answers given with any government or private entity authorized to hold records relevant to my citizenship, criminal history and mental health treatment or history; to use the demographic information, fingerprints and or digital photo. I authorize GAT TRAINING GROUP LLC to capture and securely transmit that information to the Illinois State Police and/or FBI. I further understand that information may be retained by the Illinois State Police and/ or Federal Bureau of Investigation pursuant to applicable statute. GAT Training Group will maintain the records for a period of three years. This should also serve as a notice to the applicant of their right to challenge any criminal history record information used for licensing or employment purposes if you if you feel this information is incomplete or inaccurate. Procedures on how to challenge your criminal history record is available via the internet at www.isp.state.il.us. Under penalties of perjury, I certify I have examined all the information provided and to the best of my knowledge, it is true and correct and complete.

If your fingerprints are AFIS unacceptable and reprinting is necessary to receive results, the customer is required to pay only a \$10.00 reprint fee charged by the Illinois State Police.

PLEASE RETAIN THIS RECEIPT FOR YOUR RECORDS. THERE IS A \$10.00 REPLACEMENT FEE.

SIGNED BY: Steen Zhuan DATE 1/12/14

KTV - 51
#161772
PD \$55



Illinois State Police
Concealed Carry Firearm Training Certificate

Paul Warren #CCT13A118

Instructor Name and Instructor ID Number

WTS SOLUTIONS

Business Name

N/A

Expiration Date

IL CCW #CCC13A0564

Curriculum Name and Curriculum ID Number

Paul Warren

(Instructor Name Printed)

STEVEN THOMAS

has successfully completed training for a

certify that

(Applicant Name Printed)

10/13/2013

Illinois Concealed Carry Firearms License on

(Date)

☒ I provided the full 16-hour training required by the Act.

☐ I verified _____ hours of prior training and provided additional training pursuant to the Act Section 75.g. to equal the 16 hours required.

In addition to this certificate the applicant should submit _____

(Title of prior training certificate verified by instructor)

☐ I verified the "8-hour credit" pursuant to the Act Section 75.i. and provided 8 hours of additional training pursuant to Section 75.g.

☐ I provided the 3-hour Renewal curriculum

A handwritten signature in black ink, appearing to read "Paul Warren".

Instructor Signature

A handwritten signature in black ink, appearing to read "Steven Thomas".

Applicant Signature



Exhibit B

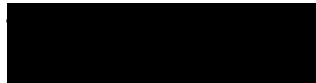
Pat Quinn
Governor

ILLINOIS STATE POLICE
Division of Administration

Hiram Grau
Director

March 19, 2014

STEVEN CHARLES THOMAS



Dear STEVEN CHARLES THOMAS

Re: Concealed Carry License Application #29538

In reviewing your application for a Concealed Carry License, the Illinois State Police received an objection to your eligibility from a law enforcement agency. Pursuant to 430 ILCS 15(a), the objection has been submitted to the Concealed Carry Licensing Review Board. The Board has notified the Department that it has determined by a preponderance of the evidence that you pose a danger to yourself or others/are a threat to public safety.

Therefore, the Board has affirmed the objection and determined that you are not eligible for a Concealed Carry License. Your application for a Concealed Carry License is hereby denied. You may appeal the decision of the Board by petitioning in writing the circuit court in the county of your residence for a hearing on the denial.

Jessica Trame

Bureau Chief - Firearms Services



Firearms Services Bureau
801-South Seventh Street • Suite 400-M
Springfield, IL 62703
(217) 782-7980 (voice) • 1 (800) 255-3323 (TDD)
• www.illinois.gov • www.isp.state.il.us