

STATE OF ILLINOIS)

Horsely v. Trame, 13-321

COUNTY OF SANGAMON)

USDC-SDIL

AFFIDAVIT

I, JESSICA TRAME, upon oath, depose and state that I have personal knowledge of the statements contained in this Affidavit; I understand the contents of this affidavit to be true and correct; I am competent to testify; and if called to testify, I would testify as follows:

1. I am currently employed as the Chief of Firearms Services Bureau of the Illinois State Police and I have served as the Bureau Chief since February 2012.

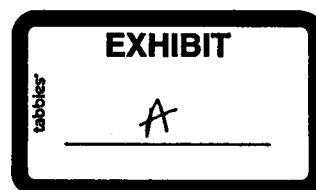
2. The Firearms Services Bureau evaluates applications for Firearm Owners Identification Cards (FOID cards), verifies applicant information, screens applications for mental health issues, manually screens criminal background information, and makes the decision as to whether a FOID card should issue in any particular case.

3. I am familiar with the claims raised and the factual assertions made in *Horsley v. Trame*, No. 13-CV-321 (S.D. Ill.)

4. Material facts which ought to appear in one or more affidavits submitted in opposition to Plaintiff's Motion for Summary Judgment in *Horsley v. Trame* are known only to persons whose affidavits Defendant is unable to procure without an opportunity to conduct discovery. Such facts include, but are not limited to:

a. Whether Plaintiff cannot obtain consent from a parent for her FOID application and the reasons therefore;

b. Whether Plaintiff is able to obtain a legal guardian for the purpose of consent and the reasons therefore;



c. Whether Plaintiff is disqualified from possessing a firearm or obtaining a FOID card for any reason, including but not limited to felony convictions or admission to a mental health facility;

5. To adequately respond to Plaintiff's motion, Defendant will likely need to depose Plaintiff and Plaintiff's parents, subpoena Plaintiff's medical and mental health records, and obtain Plaintiff's consent to conduct a background investigation.

6. Defendant is unable to adequately respond to the merits of Plaintiff's Motion for Summary Judgment unless she is afforded an opportunity to file an answer, if required, and conduct discovery in this case.

I have read the foregoing paragraphs and they are true and correct to the best of my knowledge and belief.

FURTHER AFFIANT SAYETH NOT.

Subscribed and sworn to before me

s/ Jessica Trame

this 15 day of August, 2013.

JESSICA TRAME

s/ Karen S. Levy McCanna

Notary Public

