

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

RACHEL HENRICHS, REID HENRICHS,)
GUN OWNERS OF AMERICA, INC., and)
GUN OWNERS FOUNDATION,)

Plaintiffs,)

Civil Action No. _____

v.)

BRENDAN KELLY, in his Official)
Capacity as Director of the Illinois State)
Police, and KWAME RAOUL, in his)
Official Capacity as Attorney General of)
Illinois,)

Defendants.)
_____)

DECLARATION OF RACHEL HENRICHS

1. My name is Rachel Henrichs. I am a U.S. citizen and resident of Harrogate, Tennessee, located within Claiborne County. I make this declaration in support of Plaintiffs’ Complaint for Declaratory and Injunctive Relief. Unless otherwise stated, I make this declaration based on personal knowledge. If called as a witness, I can testify to the truth of the statements contained herein.

2. I am a law-abiding person, eligible to possess firearms under state and federal law. I am over the age of 18, an avid supporter of the right to keep and bear arms, a member of Gun Owners of America, and a financial supporter of Gun Owners Foundation.

3. I currently possess a valid Tennessee Lifetime Enhanced Carry Permit and am able to lawfully bear arms in public while in Tennessee and across most of the country, either through other states’ reciprocity with my Tennessee permit, or through other states’ “constitutional carry.”

4. I served in the United States Marine Corps (“USMC”) from 2004 to 2009 and was honorably discharged. I was an Officer in the USMC and received firearm training, involving both pistols and rifles, and was deployed to Iraq carrying these firearms.

5. After I was honorably discharged from the USMC, I became a full-time operating room nurse.

6. During that time, I also served in the Marine Corps Reserves and the United States Navy Nurse Corps.

7. Since 2020, I have received over 100 hours of firearms training and am a Certified NRA Pistol Instructor.

8. I also assist others with the training of students at my husband’s and my training academy, Valor Ridge.

9. Along with my husband, Reid Henrichs, we routinely visit friends in Marion, Illinois. Within the next 60 days and regularly thereafter, we intend to visit Marion, Illinois to visit those friends, and, but for the Illinois statute and regulations that prohibit me from applying for and being issued a permit, I would carry my handgun concealed during my stay in Marion.

10. I attempted to apply for an Illinois license to carry a concealed handgun by visiting the Illinois State Police website and creating a profile at the State of Illinois Firearms Service “Applicant Portal.” See <https://www.ispfsb.com/public/ccl.aspx>.

11. However, the website would not allow me to continue to apply for a license to carry when I selected my state, Tennessee, from the drop-down menu.

12. I then emailed ISP.AskFOIDandCCL@Illinois.gov and requested assistance in applying for an Illinois license to carry a concealed handgun.

13. However, the Illinois State Police sent me a response, which stated that “Residents of

Tennessee are not eligible for a non-resident IL CCL. For more information, please visit the www.ispfsb.com FAQ section. Thank you, ISP J746.” See Exhibit 1.

14. I meet all the requirements for issuance of an Illinois license to carry a concealed handgun except that I do not reside in Illinois or one of the six other “substantially similar” states that would allow me to apply for a license. In other words, I am ready and able to apply for an Illinois license to carry a concealed handgun in Illinois if able to.

15. If I resided in Illinois or one of the other six “substantially similar” states, I would be able to apply and would be issued a permit.

16. Likewise, if Illinois accepted my Tennessee permit and granted reciprocity with Tennessee, I would be able to carry my handgun while in Illinois.

17. Because I am prohibited from even applying for an Illinois license to carry a concealed handgun, I will be required to choose between leaving my handgun locked in our vehicle while we visit friends in Illinois or violating state law.

I, Rachel Henrichs, declare under penalty of perjury that the foregoing is true and correct.

13 March 2026

DATE



RACHEL HENRICHS

From: ISP.AskFOIDandCCL ISP.AskFOIDandCCL@illinois.gov
Subject: RE: [External] Non-Resident CCL Question
Date: Feb 3, 2026 at 08:57:29
To: Rachel Hall [REDACTED]

Good morning,

Residents of Tennessee are not eligible for a non-resident IL CCL. For more information, please visit the www.ispfsb.com FAQ section.

Thank you,

ISP J746

From: Rachel Hall [REDACTED]
Sent: Monday, February 2, 2026 5:09 PM
To: ISP.AskFOIDandCCL <ISP.AskFOIDandCCL@Illinois.gov>
Subject: [External] Non-Resident CCL Question

To Whom It May Concern:

I recently created a profile on the State of Illinois Firearms Services website under this email address. After creating the profile and verifying my email address and telephone number; I went back to the website to begin the application process. On the first landing page I selected my state of residence as Tennessee, but was unable to select the box that allowed me to begin the application process for a Concealed Carry License (CCL). I was curious if there was a glitch in the system, as when I tried it with Texas as the state of residence (as it was right below Tennessee in the drop down menu) it would allow me to check this box. Thank you for any assistance you can provide. I look forward to hearing from you.

Very Respectfully
Rachel Henrichs

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