

EXHIBIT 22

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

STATE OF TEXAS, et al.,

Plaintiffs,

v.

Case No. 1:14-cv-00254

UNITED STATES OF AMERICA, et al.

Defendants.

DECLARATION OF WALT NEVERMAN

I, Walt Neverman, have personal knowledge of the following facts and declare:

1. I am the Director of the Crime Information Bureau within the Division of Law Enforcement Services of the Wisconsin Department of Justice. I am responsible for management oversight of several statewide programs for the Department, which includes the Wisconsin concealed carry program.

2. The Wisconsin concealed carry program is governed by s. 175.49 & s. 176.60 of the Wis. Stats. and Jus 17 & 18 of the Wisconsin Administrative Code. In accordance with these statutes and administrative code, the Wisconsin Department of Justice issues concealed carry certification cards to

former federal law enforcement officers and concealed carry licenses to Wisconsin residents.

3. An individual illegally within the United States would be denied a Wisconsin concealed carry license.

4. An individual who is not a citizen of the United States but is lawfully present in the United States, and otherwise qualifies for a Wisconsin concealed carry license in accordance with the requirements of state law, is eligible to apply for and receive a Wisconsin concealed carry license.

5. Deferred action status under the U. S. Department of Homeland Security memorandum dated November 20, 2014, causes an individual covered by such status to be lawfully present in the United States for the purposes of the Wisconsin concealed carry license law.

6. An otherwise eligible applicant, who has deferred action status, would be issued a Wisconsin concealed carry license.

7. Wisconsin statutes authorize the Department of Justice to charge a fee for the Wisconsin concealed carry license. The concealed carry fees charged by the Wisconsin Department of Justice do not cover the total actual costs related to issuing a Wisconsin concealed carry license.

8. If applicants in a deferred action status are issued a Wisconsin concealed carry license, funds from other DOJ appropriations will be utilized to complete the licensing process.

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

Executed on December 23, 2014.

A handwritten signature in black ink, appearing to read "Walt Neverman", is written over a horizontal line.

Walt Neverman