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November 19, 2015

**Via U.S. and Electronic Mail**

Jeff Amador  
Department of Justice  
P.O. Box 160487  
Sacramento, CA 95816-0487  
[jeff.amador@doj.ca.gov](mailto:jeff.amador@doj.ca.gov)

**RE: Public Comment on Regulations Regarding Firearm Safety Certificates  
and Safe Handling Demonstrations**

Dear Mr. Amador:

We write on behalf of our clients, the National Rifle Association (NRA) and the California Rifle and Pistol Association (CRPA), as well as their hundreds of thousands of members in California. We write to respectfully express our concerns over the proposed permanent regulations concerning Firearm Safety Certificates and Safe Handling Demonstrations, and to urge the Department to adopt the draft regulations submitted by the firearm dealer representative association, *FFLGuard*.

As currently drafted, the regulations proposed by the Department impose overly burdensome and unworkable requirements on California gun owners, retailers, distributors, and certified instructors. The FSC was intended to require firearm purchasers to have a basic familiarity with firearms and ensure they know how to safely handle and store their firearms. Unfortunately, the regulations proposed by the Department would frustrate these goals rather than further them. And some of the proposed regulations are completely detached from this purpose altogether.

The Department's failure to implement proper and timely regulations pursuant to Senate Bill 683 already resulted in litigation to prompt the adoption of both emergency and permanent regulations. Additionally, as recounted in the comment letter submitted by *FFLGuard* on November 18, NRA and CRPA have received countless complaints concerning the Firearm Safety Certificate (FSC) program since its inception.

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NRA and CRPA are aware that the comment letter submitted by *FFLGuard* also included a set of proposed revised regulations that would more properly and effectively implement the FSC program and further its goals. It is imperative that the Department closely review the draft regulations and the comments submitted by both *FFLGuard* and the individuals and businesses that will be impacted by the implementation of the FSC and safe handling regulations. This is critical to ensure that more problems will not be created by the adoption of flawed and unworkable regulations, and to ensure that further litigation is not necessary to prevent improper restraints on lawful firearm transfers arising from the adoption of unauthorized and impassable regulations.

On behalf of the NRA and CRPA, we respectfully urge the Department to adopt the draft regulations submitted by *FFLGuard*.

Sincerely,  
**Michel & Associates, P.C.**



C.D. Michel

CDM/cbm