

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

JUNE SHEW, *et al*,

Plaintiffs,

v.

DANNEL P. MALLOY, *et al*,

Defendants.

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Case No. 3:13-cv-00739-AVC

June 26, 2013

MEMORANDUM IN SUPPORT OF PLAINTIFFS'
MOTION FOR A PRELIMINARY INJUNCTION

COME NOW the Plaintiffs JUNE SHEW; RABBI MITCHELL ROCKLIN; STEPHANIE CYPHER; PETER OWENS; BRIAN McCLAIN; ANDREW MUELLER; HILLER SPORTS, LLC; M&D SHOOTING SPORTS, LLC; DELTA ARSENAL, LLC; THE CONNECTICUT CITIZENS' DEFENSE LEAGUE; and THE COALITION OF CONNECTICUT SPORTSMEN, by and through counsel, hereby set forth the following facts, reasons, and authorities in support of their motion for a preliminary injunction.

Dated: June 26, 2013

Respectfully Submitted,

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I. INTRODUCTION

Connecticut's Act Concerning Gun Violence Prevention and Children's Safety (Connecticut Public Act 13-3, General Assembly Bill No. 1160) ("the Act") radically changed provisions of Connecticut's prior firearms law.¹ The legislative purpose claimed in support of the hastily-passed Act was to prevent violent crimes committed with guns. Yet, the Act will not deter a single criminal who uses a gun to threaten, rob, or murder. To the contrary, the Act's sole impact is on Connecticut's law-abiding citizens who wish to exercise their fundamental Second Amendment right to protect themselves, their families, and their homes. By banning countless firearms that are commonly possessed for self defense and other lawful purposes, the Act makes law-abiding Connecticut citizens less safe and more likely to be the victims of crimes committed with guns.

District of Columbia v. Heller, 554 U.S. 570, 595 (2008), held that the text, structure, and history of the Second Amendment confirm that it "confer[s] an individual right to keep and bear arms." *McDonald v. City of Chicago*, 130 S. Ct. 3020, 3026 (2010), further held that this individual right is a fundamental one that applies with full force through the Fourteenth Amendment to the States.² Instead of enacting legislation that comports with the fundamental individual right the Supreme Court recognized, Connecticut did the exact opposite. Numerous provisions of the Act violate Plaintiffs' and law-abiding citizens' Second Amendment right to possess ordinary firearms in their own homes for self protection.

¹ The Act was signed into law on April 4, 2013. Senate Bill No. 1094 (hereafter "S.B. 1094"), an amendment to the Act, has passed both houses of the General Assembly and, as of this writing, is awaiting the Governor's signature.

² *Heller* and *McDonald* overruled Second Circuit precedent to the contrary. See *United States v. Toner*, 728 F.2d 115, 128 (2d Cir. 1984) ("the right to possess a gun is clearly not a fundamental right."); *Bach v. Pataki*, 408 F.3d 75, 83-86 (2d Cir. 2005) (Second Amendment inapplicable to the states).

Plaintiffs are law-abiding gun owners who are irreparably injured by the Act. The provisions of the Act that Plaintiffs seek to enjoin pertain to: (1) the capacity of standard ammunition magazines and the number of rounds that may be loaded therein; and (2) certain features on rifles and shotguns which under prior law gave rise to no restriction, but under the Act are criminalized or severely restricted under the derogatory term “assault weapons.”

This Court should enter a preliminary injunction enjoining the enforcement of these provisions. Since the challenged portions of the Act fail any standard of review applicable to constitutional rights and have no rational basis, there is a substantial likelihood that Plaintiffs will prevail on the merits of their constitutional claims. The Act prohibits Plaintiffs from exercising their fundamental Second Amendment rights, and this constitutes irreparable harm. Furthermore, the public interest will be served by the grant of a preliminary injunction: enjoining enforcement of the challenged provisions will fundamentally preserve the *status quo ante*, and will allow the citizens of Connecticut to, by-and-large, follow the requirements of established prior law regarding pistols, rifles, shotguns, magazines, and rounds while this challenge is pending.

II. STATEMENT OF FACTS

A. Restrictions On Standard Magazines and Rounds

Nationwide most handguns are manufactured with magazines holding 10 to 17 rounds. *See* Declaration of Mark Overstreet (attached hereto as “**Exhibit A**”); the National Shooting Sports Foundation (“NSSF”) *2010 Modern Sporting Rifle Comprehensive Consumer Report* (attached hereto as “**Exhibit B**”); Declaration of Guy Rossi (attached hereto as “**Exhibit C**”) at p. 2. Many commonly-possessed popular rifles are manufactured with magazines holding 15, 20, or 30 rounds. *Id.* However, the Act defines feeding devices “that ha[ve] the capacity of, or can be readily restored

or converted to accept, more than 10 rounds of ammunition” as “large capacity magazines.” CONN. GEN. STAT. § 53-202p(a)(1) . Transfer or possession of such magazines is a felony.³

*Requirement of Registration
and Prohibition on Magazines Containing “More than Ten Bullets”*

A person who declares possession of a magazine possessed before April 5, 2013, to the Department of Emergency Services and Public Protection may continue to possess it, CONN. GEN. STAT. § 53-202p(e)(3), but only at certain restricted locations, and may not possess it with “more than ten bullets” if: (1) “[a]t that person’s place of business or other property owned by that person;” (2) transporting it between the places where it may be possessed or to a dealer; or (3) “[p]ursuant to a valid permit to carry a pistol,” provided that it is “within a pistol . . . that was lawfully possessed by the person” before January 1, 2014, and that it “does not extend beyond the bottom of the pistol grip” CONN. GEN. STAT. § 53-202q(f)(7). S.B. 1094 amends that last clause to say “does not extend more than one inch below the bottom of the pistol grip.”

*Remanufacturing Grandfathered Magazines So They Cannot
Be Readily Restored or Converted to Accept More Than Ten Rounds*

The Act defines “large capacity magazines” as devices “that ha[ve] the capacity of, or can be readily restored or converted to accept, more than ten rounds of ammunition. . . .” CONN. GEN. STAT. § 53-202p(a)(1). This definition excludes magazines that have “been permanently altered so that [they] cannot accommodate more than ten rounds of ammunition” and are “permanently inoperable.” CONN. GEN. STAT. § 53-202p(a)(1).

³ Effective on April 4, 2013, the purchase, transfer, distribution, keeping for sale, offering or exposing for sale, or importation into the State of a newly-defined “large capacity magazine” is a Class D felony. CONN. GEN. STAT. § 53-202p(b). Starting January 1, 2014, possession of any standard magazine that is now defined by the Act as a “large capacity magazine” is a Class D felony. If a standard magazine banned by the Act was obtained before the Act’s passage, a first offense for possessing it is an infraction subject to a fine; any subsequent offense is a Class D felony. CONN. GEN. STAT. § 53-202p(c).

By using this definition, the Act imposes a duty on persons who wish to keep their magazines (other than those eligible to be declared) of somehow remanufacturing them so that they cannot be readily restored or converted to hold more than ten rounds. However, such remanufacturing or conversion of magazines requires advanced engineering know-how, parts, and equipment that are not possessed by Plaintiffs (or most law-abiding gun owners). Exhibit C at p. 2. *See also* Declaration of June Shew (attached hereto as “Exhibit D”); Declaration of Brian McClain (attached hereto as “Exhibit E”); Declaration of Stephanie Cypher (attached hereto as “Exhibit F”); Declaration of Rabbi Mitchell Rocklin (attached hereto as “Exhibit G”); Declaration of Peter Owens (attached hereto as “Exhibit H”); and Declaration of Andrew Mueller (attached hereto as “Exhibit I”). No such products or services are, to Plaintiffs’ knowledge, on the market. Exhibit C at 2. Indeed, as with firearms, magazine model and design types number in the hundreds or the thousands. *Id.*

Exemptions to the Ban on Large Capacity Magazines

Notwithstanding the Act, members or employees of the Department of Emergency Services and Public Protection, police departments, the Department of Correction, or the military or naval forces of Connecticut or of the United States may possess, purchase, or import the otherwise banned “large capacity magazines” regardless of whether such possession, purchase, or importation is for use in discharging their official duties or for personal use “when off duty.” CONN. GEN. STAT. § 53-202p(d)(1). S.B. 1094 expands that privilege to members or employees of various other state or local agencies. S.B. 1094, amending CONN. GEN. STAT. § 53-202p(d)(2), (3).

Under S.B. 1094, a “person who retires or is otherwise separated from service” from various state and local agencies, nuclear facilities, or an armored car service may declare possession of, and

keep, a “large capacity magazine” originally obtained for official use, without regard to the deadline of January 1, 2014, applicable to ordinary citizens. § 2(a)(2), S.B. 1094.

A non-military person who moves into Connecticut in lawful possession of a newly-defined and newly-banned “large capacity magazine” must, within ninety days, either render it permanently inoperable, sell it to a licensed gun dealer, or remove it from the State. A person who is a member of the military or naval forces of Connecticut or of the United States and is transferred into the State, by contrast, may declare possession of such magazine and keep it. CONN. GEN. STAT. § 53-202p(d).

B. Restrictions On Safety, Accuracy and Ease-Of-Use Features Commonly Found On Rifles, Pistols and Shotguns

The Act significantly redefines the term “assault weapon” so as to criminalize features that are commonly found on rifles, pistols and shotguns. Transfer or possession of an “assault weapon” is a felony.⁴ Under the Act, the presence of the following features qualifies a firearm as an “assault weapon”:

Rifles

- i. A semiautomatic, centerfire rifle that has an ability to accept a detachable magazine and has at least one of the following:
 - I. A folding or telescoping stock;
 - II. Any grip of the weapon, including a pistol grip, a thumbhole stock, or any other stock, the use of which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing;
 - III. A forward pistol grip;

⁴ Effective on April 4, 2013, a person who “distributes, transports or imports into the state, keeps for sale, or offers or exposes for sale, or who gives any assault weapon,” with certain exceptions, commits a class C felony, and “shall be sentenced to a term of imprisonment of which two years may not be suspended or reduced by the court.” Conn. Gen. Stat. § 53-202b(a)(1). Possession of a firearm defined by the Act as an “assault weapon” generally is a Class D felony, and a person so convicted “shall be sentenced to a term of imprisonment of which one year may not be suspended or reduced by the court,” subject to certain exceptions. Conn. Gen. Stat. § 53-202c(a).

- . . .
- ii. A semiautomatic, centerfire rifle that has a fixed magazine with the ability to accept more than ten rounds of ammunition; or
 - iii. A semiautomatic, centerfire rifle that has an overall length of less than thirty inches....

Pistols

- iv. A semiautomatic pistol that has the ability to accept a detachable magazine and has at least one of the following:
 - I. An ability to accept a detachable magazine that attaches at some location outside the pistol grip; [or]
- . . .
- V. A semiautomatic pistol with a fixed magazine that has the ability to accept more than ten rounds.

Shotguns

- vi. A semiautomatic shotgun that has both of the following:
 - I. A folding or telescoping stock; and
 - II. Any grip of the weapon, including a pistol grip, a thumbhole stock, or any other stock, the use of which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing; or
- vii. A semiautomatic shotgun that has the ability to accept a detachable magazine.

See CONN. GEN. STAT. § 53-202a(1)(E).

The above provisions replaced the definitions under prior law, which required that a firearm have two, rather than just one, of the listed features, but did not require that rifles and pistols be “centerfire.” Being “centerfire” excluded .22 rimfire rifles and pistols (which are used primarily for target shooting and hunting small game) from the definition of “assault weapon.” However, § 3 of

S.B. 1094 amends the Act to include in the definition: “(ix) Any semiautomatic firearm that meets the criteria set forth in subdivision (3) or (4) of subsection (a) of section 53-202a of the general statutes, revision of 1958, revised to January 1, 2013” Thus, ordinary .22 rimfire rifles and pistols are again maligned as “assault weapons” if they have two of any of the above-listed generic features.

The features listed above promote the safe and comfortable use of a firearm, and also promote firing accuracy. A brief explanation of these critical features illustrates these points.

Telescoping Stock

A stock is that part of a firearm a person holds when shooting. *See* diagram attached as “**Exhibit J.**”⁵ It provides a means for the shooter to support the firearm and easily aim it. A “telescoping stock” allows the length of a firearm’s stock to be shortened or lengthened consistent with the length of the shooter’s arms so that the stock fits comfortably against the shoulder and the rear hand holds the grip and controls the trigger properly. Exhibit C at 4. It allows the firearm to fit the shooter’s physique correctly, in the same manner as one selects the right size of shoe to wear. *Id.* A telescoping stock allows a hunter to adjust the length of the stock depending on the clothing appropriate for the weather. *Id.* Shooting outdoors in fall and winter requires heavy clothing and a shooting vest, thus requiring shortening the stock so that the firearm can be fitted for proper access to the trigger. *Id.* The gun may be adjusted to fit the different sizes of several people in a family or home, as well. *Id.* A telescoping stock does not make a firearm more powerful or more lethal. *Id.*

⁵ The firearm depicted in Exhibit J is a hunting gun commonly known as a “varmint rifle.” *See* Declaration of Michele DeLuca, attached as “**Exhibit L.**” “Varmint rifles” are hunting rifles commonly used to shoot small game such as woodchucks, coyotes, prairie dogs, etc., at long range. *Id.* Since the depicted hunting rifle is semi-automatic, can accept a detachable magazine, and has a pistol grip, it is now banned under the Act as an “assault weapon.” *Id.*

Notably, the Act's restriction on telescoping stocks has no nexus to the length or concealability of a rifle or shotgun. *Id.* at 4-5. A stock could be three feet at its minimum length and still be restricted. *Id.*

*Pistol Grips or Other Grips Allowing the Fingers
To Rest Beneath The Action*

The Act restricts rifles and shotguns with a "pistol grip or any other stock, the use of which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing." CONN. GEN. STAT. §§ 53-202a(1)(E)(i)(II), (E)(vi)(II). A firearm's "action" is where the loading and firing mechanisms come together to form a working firearm and to dictate the way in which it functions. Exhibit J. Pistol grips and stocks that allow the user's fingers to rest beneath the action are very common: many rifles and shotguns have pistol grips rather than straight grips. Exhibit C at 5.

A pistol grip is a grip of a shotgun or rifle shaped like a pistol stock. *Id.* See also Exhibit J. It allows a rifle or shotgun to be held at the shoulder with more comfort and stability. Exhibit C at 5. Pistol grips also provide sight-aligned accurate fire. *Id.* Another purpose of a pistol grip is firearm retention, which is important during a home invasion when assailant(s) may attempt to disarm a law-abiding citizen in close quarters. *Id.*

Grips or stocks that allow the fingers of the trigger hand to rest beneath the action of the firearm have no effect on the functionality of a semiautomatic rifle that has an ability to accept a detachable magazine, or shotgun with the requisite combination of features. *Id.* These features do not make a firearm more powerful or more lethal. *Id.*

Thumbhole Stock

A thumbhole stock is simply a hole carved into the stock of a rifle through which a user inserts his or her thumb. Exhibit C at 5. Thumbhole stocks allow the rifle to be held with more comfort and stability and, thus, fired more accurately. *Id.* A thumbhole stock does not make a rifle more powerful or more lethal. *Id.*

C. Firearms Specifically Named By the Act

In addition to defining “assault weapon” by certain generic features, the Act lists as “assault weapons” a total of 183 firearms identified by make, model, and other names. First, the Act lists 67 names, together with the catch-all phrase “any combination of parts from which an assault weapon . . . may be rapidly assembled” CONN. GEN. STAT. § 53-202a(1)(A).

Next, the Act lists by name 88 “specified semiautomatic centerfire rifles, or copies or duplicates thereof with the capability of any such rifles, that were in production prior to or on the effective date of this section.” CONN. GEN. STAT. § 53-202a(1)(B).⁶ The Act sets forth identical language in provisions referring to 27 named pistols and one named shotgun. CONN. GEN. STAT. § 53-202a(1)(C), (D). It then adds the catch-alls “[a] part or combination of parts designed or intended to convert a firearm into an assault weapon,” and “any combination of parts from which an assault weapon” as defined in that total of 116 listings “may be assembled” CONN. GEN. STAT. § 53-202a(1)(F).

⁶ The listed rifles include names such as VEPR; Bushmaster Carbon 15, Bushmaster XM15, Bushmaster ACR Rifles, Bushmaster MOE Rifles; Olympic Arms AR-15, A1, CAR, PCR, K3B, K30R, K16, K48, K8 and K9 Rifles; Valmet M62S, M71S and M78S, among others.

D. Commonly Possessed Firearms and Magazines Prohibited By The Act

CONN. GEN. STAT. § 53-202a(1)(A)(ii)(xx) specifically lists an “AR-15” (or a duplicate or copy thereof) as a banned semiautomatic centerfire rifle. *Id.* The AR-15 modern sporting rifle (“MSR”) platform is arguably the most popular in the United States: U.S. Government data and nationwide market and consumer surveys⁷ indicate that the AR-15 MSR is likely the most commonly-possessed rifle in the country. *See* Overstreet Declaration (Exhibit A).^{8,9} The NSSF

⁷ These sources include Bureau of Alcohol Tobacco, Firearms and Explosives (“BATF”) manufacturing and export statistics (discussed in Exhibit A at 1) and the National Shooting Sports Foundation *Modern Sporting Rifle Comprehensive Consumer Report* (attached as Exhibit B).

⁸ Colt introduced the AR-15 SP-1 rifle in 1963. *Id.* at 2. Since that time, “AR-15” has become a popular term often used to describe the same or similar MSRs made by Colt and other manufacturers (much the same way that the term “Xerox” is used to describe copy machines produced by various manufacturers). *Id.* Despite the Act’s use of the phrase “AR-15” as a specific identifier, the term “AR-15” alone is not actually engraved on semiautomatic rifles.

⁹ Data from the BATF show that:

- Between 1986-2011, over 3.3 million AR-15s were made and not exported by AR-15 manufacturers whose production can be identified from government data sources.
- In 2011, there were 6,244,998 firearms (excluding fully-automatic firearms) made in the U.S. and not exported. Of these, 2,238,832 were rifles, including 408,139 AR-15s by manufacturers whose production figures could be discerned from the BATF reports. Thus, AR-15s accounted for at least seven percent of firearms, and 18 percent of rifles, made in the U.S. for the domestic market that year.
- From 1986 through 2011, U.S.-made firearms accounted for 69 percent of all new firearms available on the commercial market in the United States. Even with the inclusion of imported firearms into the above calculations, AR-15s would account for a significant percentage of new firearms available in the United States.
- 2012-2013 Estimates. The FBI reports that background checks processed through the National Instant Criminal Background Check System (NICS), most of which are conducted for retail purchases of firearms by consumers, increased 14.2 percent in 2011 as compared to 2010; 19.1 percent in 2012 as compared to 2011; and 44.5 percent during the first three months of 2013 as compared to the same period in 2012.
- If the 2011-2013 trend for AR-15 rifle production was identical to that for NICS checks, it would mean that nearly 660,000 AR-15s were made in the U.S. and not exported during 2012 and the first three months of 2013. That figure, added to the over 3.3 million noted earlier, implies a conservative estimate of 3.97 million AR-15s for the period 1986-March 2013, excluding production by Remington and Sturm, Ruger. *See* spreadsheet attached to Overstreet declaration.

Exhibit A at 2-4.

2010 *Modern Sporting Rifle Comprehensive Consumer Report* (Exhibit B) shows that the AR-15 MSR is used primarily for self-defense and target shooting.¹⁰

AR-15 model MSRs (and all other rifles called “assault weapons” under the Act) are semiautomatic,¹¹ meaning that they are designed to fire only once when the trigger is pulled. *Id.* They are not fully automatic machine guns, which continue to fire so long as the trigger is pressed. AR-15 model MSRs have the capacity to accept a detachable magazine. *Id.* Standard magazines hold 20 or 30 rounds of ammunition, but magazines of other capacities are also available. *Id.* They also have a pistol grip typically 3 ¾ to 4 inches in length that protrudes at a rearward angle beneath the action of the rifle. *Id.*

Rifles equipped with detachable magazines holding more than ten rounds have been commonplace since the 1940s, when the M1 Carbine was introduced.¹²

Magazines that hold more than ten rounds are commonplace to the point of being standard for pistols and rifles.¹³ The actual number of magazines made or imported each year is not known

¹⁰ According to the Comprehensive Consumer Report, recreational home defense and target shooting were the top two reasons for owning an MSR. Beyond this, MSR owners considered accuracy and reliability to be the two most important things to consider when buying a MSR. Exhibit B at 7-8.

¹¹ Actually, while the list purports to include only “semiautomatic centerfire rifles,” it includes the pump-action “Remington Tactical Rifle Model 7615,” which is sold with a ten-round magazine. CONN. GEN. STAT. § 53-202a(1)(B)(xxxv).

¹² The data sources regarding standard magazines demonstrate:

- There are about two million privately owned M1 Carbines, the standard magazines for which hold 15 or 30 rounds.
- There are roughly 4 million AR-15 type rifles. They are typically sold with between one and three 30-round magazines.
- Ruger Mini-14 series rifles, which may outnumber M1 Carbines and AR-15s combined, have the capacity to accept magazines that hold more than ten rounds, and many are equipped with such magazines. Numerous other rifle designs use magazines holding more than 10 rounds.

Exhibit A at 6-7.

because the BATF does not require manufacturers to report magazine production. *Id.* at 6.

However, estimates are set forth in at least one report to the U.S. Justice Department.¹⁴ The report indicates that approximately 4.7 million magazines holding over ten rounds were imported during 1995-2000. *Id.* The report also indicates that, as of 1994, 40% percent of the semiautomatic handgun models and a majority of the semiautomatic rifle models manufactured and advertised before the enactment of federal restrictions in 1994 were sold with, or had a variation that was sold with, a magazine holding over ten rounds. *Id.*

The various features that the Act uses to classify a previously legal firearm as an “assault weapon” (e.g., pistol grips and collapsible/telescoping stocks) are also in widespread and common use. The NSSF *2010 Modern Sporting Rifle Comprehensive Consumer Report* (Exhibit B) shows that these accessories are extremely popular. *Id.*¹⁵ A common denominator of the MSR platform is the pistol grip: every MSR manufactured comes equipped with a pistol grip. [emphasis added].

¹³ The data sources also demonstrate:

- Standard magazines for very commonly owned semiautomatic pistols hold up to 17 rounds of ammunition. In 2011, about 61.5 percent of the 2.6 million pistols made in the U.S. were in calibers typically using magazines that hold over ten rounds.
- Semiautomatic pistols rose as a percentage of total handguns made in the United States and not exported, from 50 percent of 1.3 million handguns in 1986, to 82 percent of three million handguns in 2011.
- Today, police departments typically issue pistols the standard magazines for which hold more than ten rounds. One such pistol is the Glock 17, the standard magazines for which hold 17 rounds. The standard magazine for our military’s Beretta M9 9mm service pistol holds 15 rounds. The M9 replaced the M1911 .45 caliber pistol, the standard magazine for which holds seven rounds.

Exhibit A at 4-6.

¹⁴ Christopher S. Koper, *An Updated Assessment of the Federal Assault Weapons Ban: Impacts on Gun Markets and Gun Violence, 1994-2003* (Report to the National Institute of Justice, U.S. Dep’t. of Justice 2004), available at http://www.sas.upenn.edu/jerrylee/research/aw_final2004.pdf. *Id.*

¹⁵ According to the Comprehensive Consumer Report:

E. The Impact of Physical, Environmental, and Psychological Factors on Accuracy, the Ability to Re-Load, and Successful Self-Defense.

A homeowner under the extreme duress of an armed and advancing attacker is likely to fire at, but miss, his target. Exhibit C at 6-9. The following factors contribute to this likelihood: (1) nervousness and anxiety; (2) lighting conditions; (3) the presence of physical obstacles that obscure a “clean” line of sight to the target; and (4) the mechanics of retreat. Exhibit C at 6. Given the likelihood of missing her attacker, a homeowner must have quick and ready access to ammunition magazines with cartridge quantities sufficient to provide a successful defense of self, family and property. *Id.* A homeowner under attack must also have the capability to quickly and efficiently reload a firearm after all of the rounds it holds are fired. *Id.* However, many homeowners cannot reload quickly or efficiently because of age, physical limitations, and the stress/anxiety produced by a potentially life-threatening situation. *Id.* Indeed, many homeowners may possess only one firearm and a single magazine.

Studies show that trained law enforcement officers under the stress of an armed criminal attack are also likely to fire and miss at their target.¹⁶ *Id.* at 9. *See also* Declaration of Gary Kleck (attached hereto as “Exhibit K”) at 3. There are numerous studies on shootings by police officers in

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- 84% of MSR owners have at least one accessory on their rifle “out of the box.” 62% of owners accessorize their rifle after their purchase but within 12 months after purchasing it.
 - 60% of MSR owners use a collapsible/folding stock.

Exhibit B at 7-8.

¹⁶ The 2010 New York City Police Department’s *Annual Firearms Discharge Report* (“the Report”) (available at http://www.nyc.gov/html/nypd/downloads/pdf/analysis_and_planning/afdr_20111116.pdf) provides detailed information on all incidents in which NYPD officers discharged their weapons in 2010. Exhibit C at 9. In that year there were thirty-three (33) incidents of the police intentionally discharging firearms in encounters of adversarial conflict. *Id.*, the Report at 8, Figure A.10. Sixty-five percent of these incidents took place at a distance of less than ten (10) feet. *Id.* The Report at 9, Figure A.11. In 33% of these incidents, the NYPD officer(s) involved fired more than seven (7) rounds. *Id.*, The Report at 8, Figure A.10. In 21% of these incidents, the NYPD officer(s) fired more than ten rounds. *Id.*

which the officers were attempting to protect themselves and the public by trying to shoot criminal adversaries. Exhibit K at 3. In many of those shootings, the officers fired large numbers of rounds. *Id.* Yet, in 63% of the incidents, the police officers failed to hit even a single criminal with a single round. *Id.*

Notably, unlike civilians, police officers are exempt from the restrictions on magazine capacity and on loading more than ten rounds in a magazine. CONN. GEN. STAT. § 53-202p(d)(1).

Violent criminal attacks frequently occur suddenly and without warning, leaving the victim with very little time to fire the handgun to save herself. Exhibit C at 6-9. While reaction time under stress is complicated by many physiological, psychological and environmental concerns, there are three primary factors: the ability for an individual to perceive a threat (Perceptual Processing), the ability to make a decision (Cognitive Processing), and the ability of the brain to send messages to the muscles to react (Motor Processing). *Id.* This processing takes, minimally, several seconds without consideration to other factors such as distractions, noise, multiple assailants, lighting conditions, nervousness and fatigue. *Id.*

Loading a firearm requires two hands and is a far more difficult task when someone is physically handicapped or one hand is wounded during an attack. Exhibit C at 8. Having more rounds in a magazine allows the victim to better protect himself or herself without the need to reload especially if handicapped, disabled or injured. *Id.*

Several Plaintiffs in this case have handicaps which negatively impact their ability to re-load firearms. Plaintiff Stephanie Cypher is physically disabled. Exhibit F at 1. She lost her right arm to cancer at 12-years-old. *Id.* Her disability makes it extremely difficult to change magazines quickly with ease. Because Ms. Cypher can only use her left hand, she takes more time to exchange an

empty magazine for a full one than an able-bodied person. *Id.* at 2.

Ms. Cypher owns a Saiga shotgun with a magazine capable of holding more than ten rounds. *Id.* In order to change a spent magazine, Ms. Cypher must place her firearm down on a bench or table, press the magazine eject button, wiggle the magazine free, exchange the spent magazine for a new one, and then pick up the firearm. Only then does she have the ability to continue shooting. *Id.*

Plaintiff Peter Owens is also disabled; when he was four-years-old he suffered a stroke and, as a result, lost the functional use of the left side of his body. Exhibit H at 1. This disability prevents Mr. Owens from changing magazines quickly or easily. Mr. Owens takes more time to exchange an empty magazine for a full one than an able-bodied shooter. *Id.* at 2.

Mr. Owens owns a Steyr M9A1 9mm caliber semiautomatic handgun, which comes standard with a 16-round magazine. *Id.* at 1. He also own a Beretta 92 FS 9mm caliber semiautomatic handgun. *Id.* These firearms are equipped with 16-round magazines. *Id.* In order to change a magazine on either, Mr. Owens must discard the spent magazine from his firearm, tuck the empty firearm under his left arm, pick up a new magazine with his right hand, insert the new magazine into the firearm, and then continue firing. *Id.* at 2.

Other factors that impact the ability to effectively aim and re-load include the physiological reaction to the “stress flood” produced by an armed attack, the time delay caused by loading/re-loading a firearm, the loss of defensive use of the non-dominant arm and hand during loading/re-loading, and the attention distraction caused by loading/re-loading a firearm. Exhibit C. These factors affect both able-bodied gun owners and those who are handicapped. *Id.*

Life or death encounters produce a “stress flood” during which blood within a person’s body is re-routed to the larger muscles so as to allow a “flee or fight” response. Exhibit C at 8-9. This

physiological reaction to extreme stress causes significant reloading difficulty during an attack due to loss of fine motor control in the fingers. *Id.* Trying to push a magazine release or align a magazine with the magazine well with fingers that are shaking and weakened due to blood loss is very difficult for a seasoned veteran soldier or police officer who expects this phenomenon. *Id.* It is far more difficult for a civilian who has never been trained that such changes will occur, or trained during realistic scenario-based training, or who is experiencing a life-threatening attack for the first time. *Id.*

The irreducible time it takes to load and re-load is also a significant factor. Police and civilians who train in defensive handgun use learn to draw a loaded handgun, quickly acquire a sight picture, and place two shots on the attacker's upper center of mass. Exhibit C at 9. Optimally, all this can be accomplished in a little over two seconds. *Id.* Added to this process is the additional time it takes to load a handgun, which typically takes a few extra seconds. *Id.* Extensive practice can reduce how long it takes a person to load a firearm under stress, but that time cannot be reduced to zero. *Id.* Accordingly, the simple time delay of loading a spent firearm may result in the success of a violent attacker who otherwise could have been thwarted. *Id.*

Carrying an unloaded firearm will often not provide a viable means of self-defense and would frequently result in a situation where the assailant has closed the distance on the victim so that the assailant is on the person of the victim. Exhibit C at 9. The victim is left with a firearm she needs to retain so that she is not shot with her own gun.

The delay in loading a firearm has deadly implications. Exhibit C at 10. While the arms and hands are being used to load the handgun, they cannot be used for anything else. The victim is more vulnerable because both hands are occupied. *Id.* The non-gun hand becomes useless to fend off the

attacker or to deflect the attacker's weapon. *Id.* Further, if the victim were to be grabbed during the loading of the firearm, the sympathetic nervous system reaction of clenching one hand to retain the magazine, or simply tightening muscles under stress would further limit the victim's ability to complete the loading of the firearm. *Id.*

F. Criminal Use of Banned and Non-Banned Firearms By Armed Assailants

Use of Banned Firearms

Under the Act, although some semiautomatic firearms are banned, others are not, including (a) models that are not specifically named on the list of banned firearms; (b) banned models that are redesigned to remove the physical features the Act prohibits; and (c) firearms that would otherwise be banned as an "assault weapon" but are grandfathered and registered into lawful status. *See* Kleck Declaration, Exhibit K, at 6-7. Thus, mechanically identical firearms (i.e., firearms that (like banned arms) are semiautomatic, can accept a detachable magazine, and are of equally powerful caliber) will continue to be available to criminals that function in the same ways as the banned firearms and can fire rounds that are, shot-for-shot, just as lethal as rounds fired from the banned firearms. *Id.*

The Impact of Using Banned Firearms on Successful Self-Defense

All the features of semiautomatic firearms that make them more useful for criminal purposes (e.g., accuracy, the ability to fire many rounds without reloading) are present in easily-substituted, unbanned, counterpart firearms. Exhibit K at 7-8. These same features increase the utility of semiautomatic firearms for lawful self-defense. *Id.*

In self-defense situations where it is necessary for the crime victim to shoot the criminal in order to prevent harm to the defender or others, accuracy is crucial for the victim. *Id.* at 8. Where it is necessary for a crime victim to shoot the aggressor, and only lethal or incapacitating injury will

stop him, the lethality of the defender's firearm is a precondition to her ability to end the criminal attack, and prevent harm to herself and other potential victims. *Id.*

Where a crime victim faces multiple adversaries, the ability and need to fire many rounds without reloading is obvious. *Id.* at 8. The ability to fire rapidly may be essential either to deter offenders from attacking, or failing that, to shoot those aggressors who cannot be deterred. *Id.* at 8. This is because some of the defender's shots will miss, and because the offender(s) may not allow the victim much time to shoot before incapacitating the victim. *Id.*

Criminal Use of Rounds and Criminal Use of Different Firearms

Criminals rarely fire more than ten rounds in gun crimes. Exhibit K at 3. Indeed, they usually do not fire any at all – the gun is used only to threaten the victim, not attack him or her. *Id.*

Analysis of mass murderer shootings in the United States shows it is exceedingly rare that victims and bystanders in mass murderer shootings have tackled the mass murderer while he is reloading a firearm. *Id.* at 6. Most mass murderers bring multiple guns to the crimes and, therefore, can continue firing without reloading even after any one gun's ammunition is expended. *Id.* at 4. A study of every large-scale mass murderer shooting committed in the United States in the 10-year period from 1984 through 1993 found that the mass murderers possessed multiple guns in 13 of 15 incidents studied. *Id.*

III. STANDARD OF REVIEW

Under Second Circuit case law, a party seeking a preliminary injunction must demonstrate: (1) irreparable harm absent injunctive relief; (2) either a likelihood of success on the merits, or a serious question going to the merits to make them a fair ground for trial, with a balance of hardships tipping decidedly in the plaintiff's favor; and (3) that the public's interest weigh in favor of granting

an injunction. *Red Earth LLC v. United States*, 657 F.3d 138, 143 (2d Cir. 2011). While *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 24 (2008), formulated the test somewhat differently, the Second Circuit maintains that “[it has] found no command from the Supreme Court that would foreclose the application of our established ‘serious questions’ standard as a means of assessing a movant’s likelihood on the merits.” *Citigroup Global Mkts., Inc. v. VCG Special Opportunities Master Fund Ltd.*, 598 F.3d 30, 38 (2d Cir. 2010).¹⁷ As demonstrated below, Plaintiffs satisfy these threshold requirements for obtaining preliminary injunctive relief.

IV. ARGUMENT

A. PLAINTIFFS ARE LIKELY TO PREVAIL ON THE MERITS OF THEIR CONSTITUTIONAL CLAIMS.

To show likelihood of success on the merits, a movant “need not show that success is an absolute certainty. He need only make a showing that the probability of his prevailing is better than fifty percent. There may remain considerable room for doubt.” *Abdul Wali v. Coughlin*, 754 F.2d 1015, 1025 (2d Cir. 1985).

Plaintiffs’ probability of prevailing is decidedly better than fifty percent. Plaintiffs demonstrate here that certain provisions of the Act (1) violate their fundamental Second Amendment right to acquire, possess, and use commonly-owned arms for self-defense within their homes; (2) are vague and fail to give notice of what constitutes a crime, in violation of the Due Process Clause of the Fourteenth Amendment; and (3) deprive them of the Equal Protection of the Laws guaranteed by

¹⁷ See also *Am. Ctr. for Law & Justice—Northeast Inc. v. Am. Ctr. for Law & Justice, Inc.*, 2012 U.S. Dist. LEXIS 86940, at *4 n.1 (D. Conn. June 22, 2012), which held that in order to obtain a preliminary injunction a party must show: (1) that it has suffered an irreparable injury; (2) that remedies available at law, such as monetary damages, are inadequate to compensate for that injury; (3) that, considering the balance of hardships between the plaintiff and defendant, a remedy in equity is warranted; and (4) that the public interest would not be disserved by a permanent injunction. *Id.* at *3-*4.

the Fourteenth Amendment. Because the Act violates the Plaintiffs' fundamental rights, Plaintiffs raise sufficiently serious questions going to the merits to warrant entry of a preliminary injunction. Additionally, the balance of hardships also tips decidedly in Plaintiffs' favor because allowing the challenged provisions of the Act to stand during this litigation will make Plaintiffs and all other law-abiding Connecticut citizens less safe than before the Act was enacted. By contrast, Defendants will have little to no hardship by refraining to enforce the challenged provisions of the Act during this litigation.

i. The Act Prohibits Commonly-Possessed Firearms and Magazines In The Home, Where Second Amendment Guarantees Are At Their Zenith.

Rifles and shotguns with telescoping stocks, pistol grips, and thumbhole stocks, as well as standard magazines with the capacity to hold more than ten cartridges, are used by millions of law-abiding citizens throughout Connecticut and the United States for the defense of hearth and home. Exhibit A, Exhibit B. In addition, handguns and long-guns that come equipped from the factory with magazines capable of accepting more than ten rounds are used by Plaintiffs and millions of other law-abiding citizens for self-defense. *Id.* Given their widespread popularity, their common possession, and their effectiveness for self-defense, Plaintiffs are guaranteed the right to acquire, possess, and use these items to defend themselves and their loved ones. The laws of most states and federal law have no restrictions on magazine capacity or the number of rounds that may be loaded in a magazine, nor do they restrict guns that some choose to call "assault weapons."¹⁸

¹⁸ See Bureau of Alcohol, Tobacco, Firearms and Explosives, *State Laws and Published Ordinances – Firearms* (31st edition, 2010-2011), <https://www.atf.gov/files/publications/download/p/atf-p-5300-5-31st-edition/2010-2011-atf-book-final.pdf>.

The prohibitions on firearms and magazines here apply to mere possession in the home, yet “Second Amendment guarantees are at their zenith within the home.” *Kachalsky v. County of Westchester*, 701 F.3d 81, 88 (2nd Cir. 2012), citing *Heller*, 554 U.S. at 628-29. “Few laws in the history of our Nation have come close to the severe restriction of the District’s handgun ban.” *Id.* at 88, quoting *Heller* at 629. That could be said about the Act here too. Addressing the issue at hand, *Kachalsky* continued:

New York’s licensing scheme affects the ability to carry handguns only in public, while the District of Columbia ban applied in the home “where the need for defense of self, family, and property is most acute.” *Heller*, 554 U.S. at 628, 128 S.Ct. 2783. This is a critical difference. The state’s ability to regulate firearms and, for that matter, conduct, is qualitatively different in public than in the home. *Heller* reinforces this view. In striking D.C.’s handgun ban, the Court stressed that banning usable handguns in the home is a “policy choice[]” that is “off the table,” *id.* at 636.

Kachalsky at 94.¹⁹

Regarding the standard of review, *Kachalsky* decided that, even outside the home, “some form of heightened scrutiny would be appropriate.” *Id.* at 93. However, “*Heller* explains that the ‘core’ protection of the Second Amendment is the ‘right of law-abiding, responsible citizens to use arms in defense of hearth and home.’” *Id.*, quoting *Heller* at 634-35. That is the right that the Act violates here. While not deciding the level of scrutiny for burdens on the core right, “applying less than strict scrutiny when the regulation does not burden the ‘core’ protection of self-defense in the home makes eminent sense” *Id.* at 93. Deciding that intermediate scrutiny is proper regarding restrictions on carrying firearms in public, *Kachalsky* explained:

Unlike strict scrutiny review, we are not required to ensure that the legislature’s chosen means is “narrowly tailored” or the least restrictive available means to serve

¹⁹ “Treating the home as special and subject to limited state regulation is not unique to firearm regulation; it permeates individual rights jurisprudence.” *Id.* at 94, citing *Stanley v. Georgia*, 394 U.S. 557, 568 (1969) (obscene materials); *Lawrence v. Texas*, 539 U.S. 558, 562, (2003) (private sexual conduct).

the stated governmental interest. To survive intermediate scrutiny, the fit between the challenged regulation need only be substantial, “not perfect.”

Id. at 97 (citations omitted).

While we do not agree with *Kachalsky*’s view that Second Amendment rights are entitled to reduced respect outside the home, this case implicates possession of firearms inside the home, where even *Kachalsky* recognizes that Second Amendment rights are at their zenith. Accordingly, a higher standard than intermediate scrutiny applies to prohibitions on possession of firearms and magazines in the home. To be sure, *Heller* “noted that the Second Amendment right does not encompass all weapons, but only those ‘typically possessed by law-abiding citizens for lawful purposes’ and thus does not include the right to possess ‘dangerous and unusual weapons.’” *United States v. Decastro*, 682 F.3d 160, 165 n.4 (2d Cir. 2012), quoting *Heller* at 626, 627 n.26. *Heller* contrasted “typically possessed” arms with those, such as the M-16 machine gun, “that are highly unusual in society at large.” *Heller* at 625.20

The firearms and magazines banned here are typically possessed nationwide by law-abiding citizens for lawful purposes, and are anything but “unusual.” “The AR-15 is the civilian version of the military’s M-16 rifle, and is . . . a semiautomatic weapon.” *Staples v. United States*, 511 U.S. 600, 603 (1994).²¹ Ordinary firearms such as the AR-15 rifle have “traditionally have been widely accepted as lawful possessions” *Id.* at 612

Decastro noted that “heightened scrutiny is triggered only by those restrictions that (like the complete prohibition on handguns struck down in *Heller*) operate as a substantial burden on the

²⁰ See also *id.* at 629 (“It is no answer to say . . . that it is permissible to ban the possession of handguns so long as the possession of other firearms (i.e., long guns) is allowed.”).

²¹ “We use the term ‘semiautomatic’ to designate a weapon that fires only one shot with each pull of the trigger” *Id.* at 602 n.1.

ability of law-abiding citizens to possess and use a firearm for self-defense (or for other lawful purposes).” *Id.* at 166, citing *inter alia*, *Ezell v. City of Chicago*, 651 F.3d 684, 708 (7th Cir. 2011) (“a severe burden on the core Second Amendment right of armed self-defense will require an extremely strong public-interest justification and a close fit between the government's means and its end”); *United States v. Marzzarella*, 614 F.3d 85, 94–95 (3d Cir. 2010) (“de minimis” burden on the right might not warrant heightened scrutiny), *cert. denied*, 131 S.Ct. 958 (2011). *Marzzarella* is instructive here in that it upheld a ban only on firearms with obliterated serial numbers, which left identical marked firearms unrestricted and thus “does not limit the possession of any class of firearms.” *Id.* at 94 (emphasis added). By contrast, the Act here bans possession of countless ordinary firearms, based on arbitrarily-selected features.

Decastro further noted: “Reserving heightened scrutiny for regulations that burden the Second Amendment right substantially is not inconsistent with the classification of that right as fundamental to our scheme of ordered liberty in *McDonald v. City of Chicago*, 130 S.Ct. [3020, 3036 (2010)].” 682 F.3d at 166-67. *Decastro* concluded that a prohibition on transportation into one’s state of residence of a firearm acquired outside the state “does not substantially burden his right to keep and bear arms” because “it does nothing to keep someone from purchasing a firearm in her home state” *Id.* at 168. By contrast, the Act here substantially burdens the fundamental Second Amendment right because it bans mere possession of common firearms and magazines in one’s own home.

In sum, like the handgun ban in *Heller*, the ban on common firearms and magazines here is categorically void under the Second Amendment. Even if scrutinized by a standard of review, that standard would be strict scrutiny, since the Act prohibits exercise of a fundamental right in the home.

While *Heller* rejected an “interest-balancing” test, 554 U.S. at 634, the equivalent test of intermediate scrutiny would not justify the Act here, in that it is not tailored to achieve a proper governmental objective. As shown below, the provisions of the Act cannot survive any level of heightened scrutiny because they are not substantially related to the goal of promoting public safety in any way.

ii. The Act’s Restrictions Do Not Promote Public Safety Interests, But Actually Make Connecticut Citizens Less Safe.

The Act’s ban on “large capacity” magazines and firearms defined as “assault weapons” does not further any legitimate governmental interest. It will not deter criminals from using “assault weapons” to commit violent crimes or from finding substitute firearms with the same features. Exhibit J at 7. The Act’s restrictions on rifles and shotguns that contain so-called “assault weapon” characteristics are, likewise, not rationally related to the goals of reducing homicides or violent crimes or improving public safety. *Id.* The Act succeeds only in denying law-abiding citizens access to the magazines and firearms they choose and need to defend themselves. In cutting off this crucial access, the Act actually defeats its stated purpose: it makes the law-abiding citizens of Connecticut less safe.

Crime victims are highly likely to miss their intended targets under the strain and anxiety of an armed attack, and the same holds true for police officers. Exhibit C at 6; Exhibit K at 3. Because police officers have the experience, training, and temperament to handle stressful, dangerous situations far better than the average civilian, it is reasonable to assume that most Connecticut citizens will have even lower marksmanship using firearms for self-protection than that of police officers. In this obvious sense, the Act’s restriction on a standard magazine holding more than ten rounds will only make Connecticut citizens more vulnerable. In addition, since criminals

rarely fire more than ten rounds in gun crimes (Exhibit K at 3), the Act will have little deterrent effect on criminal behavior.

The Act will have an inconsequential effect on reducing the number of killed or injured victims in mass murderer shootings. Exhibit K at 4. History shows that most mass murderers utilize multiple guns during shooting sprees. *Id.* This defeats the presumption that a mass murderer lacking the banned standard magazines would be forced to reload more often, thereby giving bystanders a chance to stop him. *Id.* Thus, even the highly unlikely scenario of a mass murderer obeying a ban on “large capacity” magazines still provides the murderer with the ability to commit horrific crimes.

The ban on certain semiautomatic firearms does not advance any public safety interest, either. The ban arbitrarily outlaws certain semiautomatic firearms, but leaves others that function in the same manner on the open market. Exhibit K at 6. To the extent criminals pay attention to the ban on the specified semiautomatic arms at all, they are more likely than law-abiding citizens to obtain firearms that function in exactly the same manner as a banned firearm. *Id.* Consequently, criminals will still substitute mechanically identical semiautomatic firearms for banned ones. *Id.* The result is that criminals will commit the same crimes they otherwise would have committed with the banned firearms, with the same number of wounded or killed victims. *Id.* Since the Act bans legitimate features on “assault weapons” that make them more accurate, easier to use, and allow the user to shoot longer without re-loading, the Act will only hamstring a law-abiding citizen’s protective capability.

A firearm’s accuracy is of paramount importance in self-defense situations. Exhibit C, Exhibit K. Despite this obvious fact, the Act bans the very features that promote accurate firing. Folding stocks, pistol grips and thumbhole stocks are design features of a shotgun or rifle that enable

a shooter to hold the firearm in a comfortable and stable (and therefore more accurate) manner.

Exhibit C. There is no relation between the firearm's lethality and the location of the shooter's rear hand. *Id.*

The Act's restriction on telescoping stocks does not further any governmental interest in concealability. All it does is eliminate a rifle or shotgun's ability to properly fit the shooter. Exhibit C. Regardless of the overall length of the gun, a semiautomatic rifle that has an ability to accept a detachable magazine and a semiautomatic shotgun may not have a telescoping stock under the Act. Yet, the overall length of the firearm when the stock is retracted to its shortest position may be far longer than the overall length of a rifle or shotgun without a telescoping stock. As such, the restriction does not relate to concealability. The only effect of the restriction is that the shoulder stock cannot be adjusted to fit a shooter's size correctly.

In sum, the above restrictions violate fundamental Second Amendment rights, but even if they did not, no rational relationship exists between them and a legitimate governmental interest. For these reasons, the Act's restrictions should be enjoined.

iii. Numerous Provisions Contained in the Act Are Unconstitutionally Vague.

The Act fails to provide any clear guidance such that ordinary people can understand what is prohibited. As a result, law-abiding citizens will be subject to felony prosecutions based on their inability to steer between what is lawful or unlawful under the Act. The Act is therefore unconstitutional under the void-for-vagueness doctrine, which "requires that a penal statute define the criminal offense with sufficient definiteness that ordinary people can understand what conduct is prohibited and in a manner that does not encourage arbitrary and discriminatory enforcement." *Kolender v. Lawson*, 461 U.S. 352, 357 (1983). The underlying principle of the doctrine is that "no

man shall be held criminally responsible for conduct which he could not reasonably understand to be proscribed.” *United States v. Harriss*, 347 U.S. 612, 617 (1954).²²

“Copies or Duplicates” with the “Capability” of Other Firearms “in Production” by the Effective Date

To know whether a specific firearm is lawful under the Act, the ordinary person is expected to know the features of 183 named models. CONN. GEN. STAT. § 53-202a(1)(B). For 116 of those models, the person must know when they were in production, whether the gun at hand is a “copy” or “duplicate” of a named model, and whether it has the “capability” of a named model. *Id.* Ordinary people have no such knowledge of the design history of such scores of firearms.

An ordinary person cannot be expected to: (a) be intimately familiar with each of the 88 listed models of rifles, 27 modes of pistols, and 1 model of an obscure shotgun; (b) know which versions of the listed models were in production prior to or on the effective date of April 4, 2013, and which were not; (c) know whether a gun in question is a “copy” or “duplicate” of any one of these named models (and not vice versa), without having any defined criteria or features for such determination; and (d) know whether a gun in question has “the capability of any such” listed firearm, again with no criteria for what “capability” is to be considered.

None of the individual plaintiffs are familiar with the production dates of the 88 different models of firearms the Act calls “assault weapons.” See Exhibits C – I. They have no reasonable way of knowing which ones may have been in production prior to or on the effective date of the Act,

²² Using reasoning that does not survive *Heller* and *McDonald*, the Second Circuit rejected a vagueness challenge to an “assault weapon” ban on the basis that “the local law does not infringe upon a fundamental constitutional right. Courts rarely invalidate a statute on its face because of alleged vagueness if the statute does not relate to a fundamental constitutional right . . . and if the statute provides ‘minimally fair notice’ of what the statute prohibits.” *Richmond Boro Gun Club, Inc. v. City of New York*, 97 F.3d 681, 684 (2nd Cir. 1996). See also *United States v. Toner*, 728 F.2d 115, 128 (2d Cir. 1984) (“the statute passes constitutional muster if it rests on a rational basis, . . . since the right to possess a gun is clearly not a fundamental right”).

and are unaware of any source to research their production histories. *Id.* The individual plaintiffs don't understand what would be a "duplicate" or "copy" of a listed firearm, or what it means to have "the capability of any such" firearm, which may or may not refer to rate of fire, caliber, ballistics, range, durability, accuracy, barrel length, barrel diameter, sights, internal parts and operation (such as disconnecter, firing pin, bolt, etc.), trigger pull, or some entirely different factor altogether. *Id.* The same holds true for the business plaintiffs. *See* DeLuca Declaration, Exhibit L.

Likewise, the individual and business plaintiffs lack knowledge of the parts or components that comprise the 67 different firearms the Act calls "assault weapons." Exhibits C – I, L. They don't know which "combination of parts" could "rapidly be assembled" into a banned firearm. *Id.*

The individual and business plaintiffs fear that if they were to buy or sell a firearm that is later determined to be a "duplicate or copy" of a banned firearm, they would be criminally prosecuted or imprisoned. *Id.* They are likewise afraid that they might possess a "combination" of illegal parts for which they could be prosecuted and jailed. *Id.* But they have no reasonable way of knowing what the State deems to be an illegal "duplicate" or "copy," what the term "capability" means, or which parts comprise so many different kinds of firearms. *Id.* The confusion generated by these terms is so great that Michele DeLuca has been dissuaded from selling virtually any semiautomatic rifle. Exhibit L at 3.

While the Act bans "copies" or "duplicates" of the listed guns, it does not explain which features on the listed firearms cannot be copied or duplicated. Given that all firearms will have many common features, an ordinary person is left to speculate as to how much commonality between an unlisted firearm and a listed firearm will make the unlisted firearm an unlawful "copy"

or “duplicate.” The Act leaves it to the ordinary person to guess and face felony charges if he or she gets it wrong.

The Act also imposes a Catch-22 that will effectively ensure that people of ordinary intelligence are unable to comply with the ban. Specifically, the listed firearms for which no copies or duplicates are allowed are all banned. Thus, when the ordinary person with interest in a particular firearm attempts to determine if it is too similar to a prohibited listed firearm, he or she must do so without even being able to directly compare the two firearms.

A similar law defining an “assault weapon” as thirty-four specific rifles and some shotguns and pistols, or “[o]ther models by the same manufacturer with the same action design that have slight modifications or enhancements,” was declared unconstitutionally vague on its face in *Springfield Armory, Inc. v. City of Columbus*, 29 F.3d 250 (6th Cir. 1994). The court began with the basic principle that laws must “give the person of ordinary intelligence a reasonable opportunity to know what is prohibited,” and “must provide explicit standards for those who apply them.” *Id.* at 251 (citing *Grayned v. Rockford*, 408 U.S. 104, 108 (1972)). “When criminal penalties are at stake, as they are in the present case, a relatively strict test is warranted.” *Id.* at 252 (citing *Hoffman Estates v. Flipside, Hoffman Estates, Inc.*, 455 U.S. 489, 499 (1982)).

Springfield Armory first analyzed the “assault weapon” definitions, stating, “In the present case, the ordinance is fundamentally irrational and impossible to apply consistently by the buying public, the sportsman, the law enforcement officer, the prosecutor or the judge.” *Id.* at 252. The Court reasoned that the law “bans only an arbitrary and ill-defined subset of these weapons,” while not banning “possession of weapons which are virtually identical to those listed if they are produced

by a manufacturer that is not listed.” *Id.* As for the generic catch-all clause: “Nor does the ordinance define ‘same action design’ or ‘slight modifications.’” *Id.*

The *Springfield Armory* court found that use of the term “slight modifications” (much like the Act’s use of vague terms like “capability” in this case) raised unanswerable questions: “How is the ordinary consumer to determine which changes may be considered slight? A weapon’s accuracy, magazine capacity, velocity, size and shape and the caliber of ammunition it takes can all be altered.” *Id.* at 253.²³ The Court further found that the term “modification” (like the Act’s terms “copy or duplicate”) was vague because “ordinary consumers cannot be expected to know the developmental history of a particular weapon”:

Nothing in the ordinance provides sufficient information to enable a person of average intelligence to determine whether a weapon they wish to purchase has a design history of the sort which would bring it within this ordinance’s coverage. See *Robertson v. Denver*, 874 P.2d 325, 335 (Colo. 1994) (holding similar provision invalid because “ascertaining the design history and action design of a pistol is not something that can be expected of a person of common intelligence.”) The record indicates that the average gun owner knows very little about how his gun operates or its design features.

Id. at 253. Given the use of such ill-defined terminology, the *Springfield Armory* court concluded that the challenged ordinance was invalid on its face. *Id.* at 254.

Nor is it reasonable to suggest that gun owners can conduct research and tests to determine whether a specific gun is somehow a copy or duplicate of some other gun: “Whether persons of ordinary intelligence must necessarily guess as to an ordinance’s meaning and application does not

²³ The court asked:

For example, the Colt Sporter Lightweight is a 5.56mm caliber weapon equipped with a 16 inch barrel, a 5-round magazine capacity, a 14.5 inch sight radius and weighs 6.7 lbs. . . . If Colt modifies this weapon so that it takes a 9mm cartridge, has a 20 inch barrel, a 20-round magazine capacity, a 19.75 inch sight radius and weighs 10 lbs., would this new weapon be a slight modification?

Id. at 253.

turn on whether some source exists for determining the proper application of a law.” *Robertson*, 874 P.2d at 334-35. As the court added, “the assault weapon ordinance does not specify any source which would aid in defining what an assault pistol is, nor does it state where such a source can be found.” *Id.* at 335. The same applies here.

The Act falls far short of being “clearly defined” such that the ordinary person can know how to avoid unlawful conduct. *Grayned v. Rockford*, 408 U.S. 104, 108 (1972). Indeed, the language at issue here is the firearms equivalent to a ban on sports utility vehicles that lists known SUVs, but also inexplicably lists a Toyota Corolla (a compact 4-door sedan), and further prohibits any automobiles having “capabilities” of those listed. A consumer would undoubtedly wonder whether a Corolla was really banned given that it is not a sport utility vehicle. A consumer would also have to wonder whether the reference to a Toyota Corolla in the list (along with its’ prohibition on vehicles with the similar “capabilities”) meant that the SUV ban extended to (a) Honda Civics; (b) Ford Focuses; (c) compact cars in general; (d) four-door sedans in general; or (e) something altogether different. Such a situation would also allow for arbitrary and discriminatory enforcement such that it could not be constitutional. *Id.* The same is true here.

The reference to “capabilities” without any explanation of the level of generality to which “capabilities” are to be considered makes the Act impossible to clearly understand. At a very broad level, all firearms—just like all automobiles—will possess many of the same “capabilities.” However, if “capabilities” is meant to be construed narrowly, all firearms (and automobiles) can be viewed as having very different “capabilities.” The problem is that the Act does not explain what level of “capabilities” are to be considered. This leaves law enforcement unfettered discretion to bring felony charges against those who they view as getting it wrong.

Accordingly, the references to “copies or duplicates thereof with the capability of any such [firearms], that were in production prior to or on the effective date of this section” in CONN. GEN. STAT. § 53-202a(1)(B), § 53-202a(1)(C), and § 53-202a(1)(D) are unconstitutionally vague.

Inaccurate Names of “Assault Weapons”

The Act lists “assault weapons” by reference to 183 different names. CONN. GEN. STAT. § 53-202a(1)(A)-(D). The words listed in the Act in many cases do not correspond to the names that are actually engraved on specific firearms, leaving the possessor, or the person who would obtain possession, without knowledge of what is prohibited. This is unconstitutional, since “[n]o one may be required at peril of life, liberty or property to speculate as to the meaning of penal statutes.” *Lanzetta v. New Jersey*, 306 U.S. 451, 452-53 (1939).

“[T]here is a long tradition of widespread lawful gun ownership by private individuals in this country,” and “owning a gun is usually licit and blameless conduct.” *Staples v. United States*, 511 U.S. 600, 613-14 (1994). *Staples* read federal firearms laws as applied to semiautomatic firearms not “to make outlaws of gun owners who were wholly ignorant of the offending characteristics of their weapons, and to subject them to lengthy prison terms” *Id.* at 620. Accordingly, consistent with due process, the Act’s prohibitions may not be applied to firearms that are not engraved with the precise names listed in the Act. Consistent with that, it was held that a felon was “on notice” that a firearm had traveled in interstate commerce based on its markings: “The pistol is imprinted with the words ‘Made in West Germany.’” *United States v. Carter*, 981 F.2d 645, 648 (2nd Cir. 1992), *cert. denied*, 507 U.S. 1023 (1993).

There are also instances in which the Act mistakes a different action type for a semiautomatic. It defines “assault weapon” in part as “[a]ny of the following specified

semiautomatic centerfire rifles . . . Remington Tactical Rifle Model 7615 . . .” CONN. GEN. STAT. § 53-202a(1)(B)(xxxv). However, the Remington 7615 is not a semiautomatic rifle at all, but instead is a pump action rifle.²⁴

The Act also lists model names by some manufacturers but is silent on the same model names by other manufacturers. For instance, it does not list the Beretta BM59, a selective-fire rifle (meaning that it will fire fully automatic). See Defense Intelligence Agency, *Small Arms Identification and Operation Guide – Free World* 183-84 (1980). But the only “BM59” listed in the Act is the “Springfield Armory BM59,” which only fires semiautomatically. CONN. GEN. STAT. § 53-202a(1)(A)(i). And since the Beretta BM59 is not a “copy or duplicate” of the Springfield model, it is not an “assault weapon.”

Thus, the Act is “fundamentally irrational and impossible to apply consistently” because it “outlaws assault weapons only by outlawing certain brand names without including within the prohibition similar assault weapons of the same type, function or capability.” *Springfield Armory*, 29 F.3d at 252.²⁵ Added to the vagueness of its terminology, CONN. GEN. STAT. § 53-202a(1)(A)-(D) is void.

Unclear Definitions Regarding the Modification Alteration, or Assembly of Magazines and Components

Several definitions in the Act refer to the potential to “restore,” “convert,” “assemble” or “alter” magazines or parts in a given way. CONN. GEN. STAT. § 53-202p(a)(1). Others refer to doing so “readily” or “rapidly.” CONN. GEN. STAT. § 53-202a(1)(A). These terms are subjective and ambiguous and, as such, inherently vague.

²⁴ <http://www.remington.com/en/products/archived/centerfire/pump-action/model-7615.aspx>.

²⁵ Here, out of the scores of listings, only a single rifle is identified with an identifiable generic feature – the “Ruger Mini-14/5F folding stock model only.” CONN. GEN. STAT. § 53-202a(1)(A)(I).

A “large capacity magazine” includes a device that “can be readily restored or converted to accept, more than ten rounds of ammunition,” excluding “a feeding device that has been permanently altered so that it cannot accommodate more than ten rounds of ammunition.” CONN. GEN. STAT. § 53-202p(a)(1). An ordinary person or police officer will only know how many rounds fit into a magazine in its present form. To engage in “restoration” or “conversion,” a person needs the knowledge and ability to disassemble, manipulate, reassemble, and experiment with a magazine, which may be of an intricate design. Cutting, filing, or other alteration may be required, and it may destroy the magazine. Whether a restoration or conversion may be done “readily” is anyone’s guess. Thus, the definition of “large capacity magazine” is vague.

The Act’s definition of an “assault weapon” as a collection of unassembled parts involves components that an ordinary person may not even recognize as firearm-related. The Act’s description of 67 different “assault weapons” concludes with the catch-all phrase “any combination of parts from which an assault weapon . . . may be rapidly assembled . . .” CONN. GEN. STAT. § 53-202a(1)(A). The Act adds the catch-alls “[a] part or combination of parts designed or intended to convert a firearm into an assault weapon,” and “any combination of parts from which an assault weapon” as defined in a total of 116 listings “may be assembled.” CONN. GEN. STAT. § 53-202a(1)(F).

To not run afoul of this part of the law, a gun owner must identify all of the parts of some 183 different firearms. The owner must also know that combinations of such parts may be “rapidly assembled” into 67 firearms under one category, or may be “designed or intended to convert” or “may be assembled” into 116 firearms under three other categories. The world’s top gun designers

likely do not possess this kind of knowledge, let alone the “ordinary person” by which the Act must be judged.

Peoples Rights Organization, Inc. v. City of Columbus, 152 F.3d 522, 538 (6th Cir. 1998), *aff’g in part & rev’g in part*, 925 F. Supp. 1254 (S.D. Ohio 1996) (“*PRO*”), held as vague comparable, but far less complex, definitions than the Act’s definitions in this case. As the Sixth Circuit noted, “in the absence of a scienter requirement . . . [a] statute is little more than ‘a trap for those who act in good faith.’” *Id.* at 534 (quoting *Colautti v. Franklin*, 439 U.S. 379, 395 (1979)). Here, the Act does not require scienter either.

PRO held that the definition of “assault weapon” as “any firearm which may be restored to an operable assault weapon” to be vague because it “provides absolutely no guidance for interpreting the phrase ‘to be restored.’” *Id.* at 537. “No standard is provided for what ‘may be restored’ means, such as may be restored by the person in possession, or may be restored by a master gunsmith using the facilities of a fully-equipped machine shop.” *Id.* (brackets omitted). The definitions in *PRO* are similar to the Act’s definition of “large capacity magazine” in this case.

PRO further invalidated as vague the definition of “assault weapon” as “any combination of parts from which an assault weapon . . . may be readily assembled if those parts are in the possession or under the control of the same person.” *Id.* This definition of “assault weapon” is similar to the Act’s definition set forth in CONN. GEN. STAT. § 53-202a(1)(A). *PRO* also reasoned, “[T]he phrase ‘may be readily assembled’ does not provide sufficient information to enable a person of average intelligence to determine whether a particular combination of parts is within the ordinance’s coverage.” *Id.* at 538. As the Plaintiffs’ expert explained, an ordinary person has no way to know “how much time is included in ‘readily’” or by whom parts “may be readily assembled,” terms

which did not inform whether they mean “may be readily assembled by the person in possession, or may be readily assembled by a master gunsmith using the facilities of a fully-equipped machine shop.” 925 F. Supp. at 1269.

The Sixth Circuit’s reasoning in *PRO* applies to the Act’s definitions of so-called “large capacity magazine” and “assault weapon.” Accordingly, the clause “can be readily restored or converted to accept,” CONN. GEN. STAT. § 53-202p(a)(1), and the catch-all clauses about “combinations of parts,” § 53-202a(1)(A) & (F), are unconstitutionally vague.

Capacity to Accept More Than Ten Rounds

The Act criminalizes an ammunition feeding device that “has a capacity of . . . more than” ten rounds of ammunition. CONN. GEN. STAT. § 53-202p. In addition, the Act’s definition of “assault weapon” includes: “A semiautomatic, centerfire rifle that has a fixed magazine with the ability to accept more than ten rounds” *Id.* § 53-202a(1)(E)(ii). These provisions are unconstitutionally vague as applied to tubular magazines.²⁶

Many rifles and shotguns have tubular magazines in which cartridges are inserted one behind the other. Cartridges of the same caliber come in different lengths. Thus, the capacity of or ability to accept cartridges in tubular magazines varies with the length of the rounds inserted therein. They may hold no more than ten of one length, but more than ten of another length. *Peoples Rights Organization, supra*, 152 F.3d 522, invalidated a ban on “any semiautomatic shotgun with a magazine capacity of more than six rounds” based on the same characteristics that tubular magazines have:

²⁶ Tubular magazines store cartridges end-to-end inside of a spring-loaded tube, which typically runs parallel to the barrel, or in the buttstock.

Shotgun rounds are available in different lengths. . . . Rounds of a short length may cause a shotgun's magazine capacity to exceed six rounds. Conversely, rounds of a longer length (which may be all the owner possesses or is aware of) will result in a capacity that is less than six rounds. This provision is a trap for the unwary. It imposes criminal liability regardless of whether a shotgun owner knows of the existence of shorter length rounds. Hence, we find this definition unconstitutionally vague.

Id. at 536.²⁷

The same vagueness defects apply here. The Act creates a trap for the ordinary person, imposing stiff penalties regardless of whether a rifle or shotgun owner knows that shorter length rounds exist. Accordingly, as applied to rifles and shotguns with tubular magazines, the references to "capacity" and "ability to accept" "more than ten rounds" in CONN. GEN. STAT. §§ 53-202p and 53-202a(1)(E)(ii) are unconstitutionally vague.

iv. The Act's Restrictions Violate the Equal Protection Clause.

The restrictions at issue fail to pass muster under any standard of review for equal protection purposes. The fundamental right to possess arms for self defense in one's own home gives rise to strict scrutiny. But the restrictions here fail to pass even rational basis review.

"Under the Fourteenth Amendment, a law that 'impermissibly interferes with the exercise of a fundamental right . . . ' is reviewed under the strict scrutiny standard." *Dandamudi v. Tisch*, 686 F.3d 66, 72 (2d Cir. 2012) (citation omitted). "Where no . . . fundamental right [is] infringed upon by government conduct, the constitutional guarantee of equal protection is satisfied where a classification bears a rational relationship to an appropriate governmental interest." *Windsor v. United States*, 699 F.3d 169, 196 (2d Cir. 2012). "Having a conceivable legitimate governmental

²⁷ The court noted that the record indicated that 12 gauge shotgun shells are available in the following lengths: 2", 2 ½", 2 ¾", and 3 ½". *Id.* at 535 n.15.

interest is, alone, not sufficient for rational basis review. To survive rational basis review, a law must also have a rational relationship to the asserted legitimate governmental interest.” *Id.* at 197.

As explained above, the Act imposes felony penalties on ordinary citizens for possession and transfer of newly-banned firearms and magazines. Those who possessed them before April 4, 2013, must declare them by January 1, 2014.

By contrast, members and employees of various state or local agencies may have all the magazines and “assault weapons” they want, even for personal use “when off duty.” CONN. GEN. STAT. § 53-202p(d)(2) (magazines); § 53-202c(b)(2), as amended by § 6, S.B. 1094 (“assault weapons”). Persons in the military may also have any magazine, without any requirement that it be for duty purposes. CONN. GEN. STAT. § 53-202p(d)(3).

Further, a “person who retires or is otherwise separated from service,” without regard to the reason for such separation, from various state and local agencies, nuclear facilities, or an armored car service may declare possession of, and keep, magazines originally obtained for official use, without regard to any deadline. § 2(a)(2), S.B. 1094. Moreover, any such person who purchases an “assault weapon” for use in the discharge of official duties “who retires or is otherwise separated from service” may declare possession thereof and keep it. CONN. GEN. STAT. § 53-202d(a)(1)(B) & (2)(B), as amended by § 7, S.B. 1094.

An ordinary person who moves to Connecticut may not keep a banned magazine or firearm. A member of the military who moves to Connecticut may declare and keep such magazine and firearm. § 2(d), S.B. 1094, amending CONN. GEN. STAT. § 53-202q(1)(A) (magazine); § 53-202d(d) (“assault weapon”).

These discriminations in favor of selected classes and against ordinary citizens who wish to possess common firearms and magazines to protect themselves and their families from violence denies to plaintiffs and members of plaintiff associations the equal protection of the laws, contrary to the Fourteenth Amendment to the United States Constitution.

Similar discriminations were held violative of equal protection in *Silveira v. Lockyer*, 312 F.3d 1052, 1089 (9th Cir. 2002), *cert. denied*, 540 U.S. 1046 (2003). *Silveira* invalidated, as lacking any “clearly rational basis,” a California law exempting from an “assault weapon” ban transfers to retired law enforcement officers. As in the comparable exemptions here: “The exception does not require that the transfer be for law enforcement purposes, and the possession and use of the weapons is not so limited.” *Id.* at 1090. The court held that “the retired officers exception arbitrarily and unreasonably affords a privilege to one group of individuals that is denied to others, including Plaintiffs.” *Id.* at 1092. That is the case here as well. As such, the exemptions in the Act violate the Equal Protection Clause of the Fourteenth Amendment.

The unconstitutional provisions discriminating in favor of selected classes may not simply be excised from the Act, because the legislature did not make it a crime for the favored classes to possess and engage in other activities involving the subject firearms and magazines. A law from which a portion is stricken remains fully operative only if “its elimination in no way alters the substantive reach of the statute and leaves completely unchanged its basic operation.” *United States v. Jackson*, 390 U.S. 570, 586 (1968). Declaring only the discriminations in favor of selected classes void would criminalize that which the legislature has not criminalized. “To limit this statute in the manner now asked for would be to make a new law, not to enforce an old one. This is no part of our duty.” *United States v. Reese*, 92 U.S. (2 Otto) 214, 221 (1875) (holding provisions not severable).

Since the discriminatory, unconstitutional provisions may not be severed from the prohibitions applicable to ordinary citizens, the following provisions must be declared void in their entirety: CONN. GEN. STAT. § 53-202p(b) (prohibiting transactions in magazines); § 53-202p(c) (prohibiting possession of magazines); § 53-202b(a)(1) (prohibiting transactions in “assault weapons”); § 53-202c(a) (prohibiting possession of “assault weapons”).

**B. PLAINTIFFS WILL SUFFER IRREPARABLE HARM
IN THE ABSENCE OF PRELIMINARY INJUNCTIVE RELIEF.**

The Act forces Plaintiffs to make one of two choices, both of which cause irreparable harm. Obedience to the Act deprives Plaintiffs of firearms and magazines that they choose to keep in their homes for protection from criminal attack. This not only violates Plaintiffs’ constitutional rights, it exposes them to potential injury or death. Violation of the Act, on the other hand, exposes them to the threat of arrest, prosecution, incarceration, and loss of civil rights.

“[W]hen an alleged deprivation of a constitutional right is involved, most courts hold that no further showing of irreparable injury is necessary” *Does v. Enfield Pub. Sch.*, 716 F. Supp. 2d 172, 184 (D. Conn. 2010) (granting preliminary injunction), quoting 11A Charles A. Wright, Arthur R. Miller and Mary Kane, *Federal Practice and Procedure*, § 2948.1 at 161 (2d ed.1995). “Because Plaintiffs allege deprivation of a constitutional right, no separate showing of irreparable harm is necessary.” *Statharos v. N.Y. City Taxi & Limousine Comm’n*, 198 F.3d 317, 322 (2d Cir. 1999); *see Johnson v. Miles*, 355 F. App’x 444, 446 (2d Cir. 2009) (“an alleged violation of a constitutional right triggers a finding of irreparable harm”); *Jolly v. Coughlin*, 76 F.3d 468, 482 (2d Cir.1996) (“The district court . . . properly relied on the presumption of irreparable injury that flows from a violation of constitutional rights.”).

“Although a showing that irreparable injury will be suffered before a decision on the merits may be reached is insufficient by itself to require the granting of a preliminary injunction, it is nevertheless the most significant condition which must be demonstrated.” *Inabinett v. Lantz*, 3:05-CV-214 (AVC), 2006 WL 2583072, *2 (D. Conn. Aug. 30, 2006) (citing *Citibank, N.A. v. Citytrust*, 756 F.2d 273, 275 (2d Cir.1985)).

i. **The Act’s Prohibitions of Magazines with a Capacity of Over Ten Rounds and So-Called “Assault Weapons” Impede On Plaintiffs’ Ability to Defend Themselves.**

Plaintiffs and members of the CCDL and CCS enjoy a fundamental right to keep and bear arms. *McDonald*, 130 S. Ct. at 3042; *Heller*, 554 U.S. at 628 (“[T]he inherent right of self-defense has been central to the Second Amendment right.”). However, if they may not purchase and possess magazines holding more than ten rounds, or an entire class of arms that possess features that make them more accurate, more comfortable, and easier-to-use, then Plaintiffs’ ability to defend themselves, their families, and their property in their homes is severely compromised. The Act’s restriction on the “large capacity” magazines and “assault weapons” is unconstitutional.

The Act’s arbitrary limitation of the number of rounds allowable for a magazine for a firearm in the home causes irreparable harm from a successful criminal attack in the home. Exhibit C at 5-9. The ten-round limitation ignores that not all homeowners possess more than one magazine, or if they do, that they are able to change magazines while under criminal attack. *Id.* at 8.

Plaintiffs are not able to replace magazines so easily. Plaintiffs Stephanie Cypher and Peter Owens have disabilities that exponentially increase the difficulty of changing magazines and the time it takes to do so. Exhibit F, Exhibit H. The extra time they need to re-load their firearms increases their vulnerability, but this is eliminated by their ability to use a magazine that holds

greater than ten rounds: Yet, the Act's criminalization of such magazines irrationally increases their susceptibility to attack. To be sure, all Plaintiffs (handicapped and able-bodied alike) must engage in the perceptual, cognitive and motor processes a home invasion or other traumatic criminal encounter invokes. None are immune to the physiological "stress flood" produced by an armed attack, the time delay caused by loading/re-loading a firearm, the loss of defensive use of the non-dominant arm and hand during loading/re-loading, or the attention distraction caused by loading/re-loading a firearm.

Plaintiffs are also irreparably harmed by the Act's forcing them to use mechanically inferior firearms to defend themselves. The Act's ban on pistol grips, grips that allow the fingers of the trigger hand to rest below the action, thumbhole stocks and telescoping stocks leaves plaintiffs no choice but to use firearms that are less accurate, more unwieldy, more uncomfortable to hold, and which don't fit the user properly. Since criminals will ignore the ban on these items, the Act forces plaintiffs to oppose an armed intruder at a decided disadvantage.

While all of these factors demonstrate the legitimate and compelling need to possess so-called "large capacity magazines" and "assault weapons," the need is most clearly revealed by the fact that police officers are exempt from the restrictions on both, even when they are off-duty and in their own homes. CONN. GEN. STAT. § 53-202p(d)(1). Here, the Act's unconstitutional restrictions are shown to be particularly backward and harmful: since law enforcement officers are highly trained and presumably more experienced with handling armed aggressors, it stands to reason that they would need *less* ammunition and *less* sophisticated firearms to defend themselves than ordinary citizens. As police officers cannot be everywhere at once, ordinary citizens must be afforded the greatest opportunity to serve as their own first line of defense, even while waiting for police officers

to respond to a 911 call. Yet, the Act's restricts the law-abiding gun owner's ability to do so, causing irreparable harm in the process.

Although the need for meaningful self-defense is obvious, a law-abiding citizen is not required to show that he or she has a need: the burden is on the State to justify any encroachment on the right to armed self-defense recognized by the Second Amendment. Since the Act causes irreparable harm, this is a burden the State cannot bear.

C. GRANTING PRELIMINARY INJUNCTIVE RELIEF IS IN THE PUBLIC INTEREST.

Granting Plaintiffs the relief they seek will serve the public interest. It is beyond cavil that the public interest is served when each law-abiding citizen has the ability to defend himself, his family, and his property in a manner that will be the most effective. *Heller* and *McDonald* recognized that the Second Amendment conferred a right of law-abiding citizens to possess ordinary firearms in their own homes for self protection. Even in light of that Court's clear holdings on this fundamental constitutional right, the hastily-passed Connecticut legislation severely infringes on the right. The public interest is not served by allowing enforcement, pending judicial review, of an Act which on its face severely restricts law-abiding Connecticut citizens' ability to possess a firearm in the home for self-protection and the protection of the citizen's family and property.

The public interest is always served when constitutional rights are vindicated. "In the absence of legitimate, countervailing concerns, the public interest clearly favors the protection of constitutional rights" *Lopez Torres v. New York State Bd. of Elections*, 462 F.3d 161, 207 (2d Cir. 2006) (citation omitted); see *Haitian Centers Council, Inc. v. McNary*, 969 F.2d 1326, 1347 n.18 (2d Cir. 1992) (noting "[t]he public interest in having United States personnel comply with the Constitution").

V. CONCLUSION

This Court should issue a preliminary injunction against enforcement of and/or prosecution of citizens under the following sections of the Connecticut General Statutes (as amended or created by corresponding sections of the Act):

1. CONN. GEN. STAT. §§ 53-202p(a)(1), 53-202p(e)(3), and 53-202q(f)-(g), which make it unlawful to possess an ammunition feeding device containing more than ten rounds of ammunition.

2. CONN. GEN. STAT. § 53-202p(c), which makes it unlawful to possess, and CONN. GEN. STAT. § 53-202p(b), which makes it unlawful to transport, ship, or dispose of, a large capacity ammunition feeding device.

3. CONN. GEN. STAT. § 53-202b(a)(1), which makes it unlawful to distribute, transport or import into the state, keep for sale, or offer or expose for sale, or give any “assault weapon.”

4. CONN. GEN. STAT. § 53-202c(a), which makes it unlawful to possess any “assault weapon.”

5. CONN. GEN. STAT. § 53-202p(a)(1), in referring to any device “that can be readily restored or converted to accept” more than ten rounds of ammunition.

6. CONN. GEN. STAT. § 53-202p(a)(1), in referring to any device that “has a capacity of, or that can be readily restored or converted to accept, more than” ten rounds of ammunition, as applied to tubular magazines for other than .22 caliber firearms.

7. CONN. GEN. STAT. § 53-202a(1)(E)(i) and (vi), defining “assault weapon” in part as certain rifles and shotguns as having “a folding or telescoping stock” or “a pistol grip, a thumbhole stock, or any other stock, the use of which would allow an individual to grip the weapon, resulting in

any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing,” or certain shotguns having both such features.

8. CONN. GEN. STAT. § 53-202a(1)(E)(vii), which defines an “assault weapon” as a semiautomatic shotgun with “an ability to accept a detachable magazine.”

9. CONN. GEN. STAT. § 53-202a(1)(A)(i), which names as “assault weapons” 67 separate firearms, and CONN. GEN. STAT. § 53-202a(1)(A)(ii), which describes an “assault weapon” as “a part or combination of parts designed or intended to convert a firearm into an assault weapon, as defined in subparagraph (A)(i) of this subdivision, or any combination of parts from which an assault weapon, as defined in subparagraph (A)(i) of this subdivision, may be rapidly assembled if those parts are in the possession or under the control of the same person.”

10. CONN. GEN. STAT. § 53-202a(1)(B), which names as “assault weapons” 88 “specified semiautomatic centerfire rifles, or copies or duplicates thereof with the capability of any such rifles, that were in production prior to or on the effective date of this section.”

11. CONN. GEN. STAT. § 53-202a(1)(C), which names as “assault weapons” 27 semiautomatic pistols “or copies or duplicates thereof with the capability of any such pistols, that were in production prior to or on the effective date of this section.”

12. CONN. GEN. STAT. § 53-202a(1)(D), which names as an “assault weapon” one shotgun “or copies or duplicates thereof with the capability of any such shotguns, that were in production prior to or on the effective date of this section.”

13. CONN. GEN. STAT. § 53-202a(1)(F), which describes as an “assault weapon” a “part or combination of parts designed or intended to convert a firearm into an assault weapon, as defined in any provision of subparagraphs (B) to (E), inclusive, of this subdivision, or any combination of parts

from which an assault weapon, as defined in any provision of subparagraphs (B) to (E), inclusive, of this subdivision, may be assembled if those parts are in the possession or under the control of the same person.”

Dated: June 26, 2013

Respectfully Submitted,

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CERTIFICATION

I hereby certify that on June 26, 2013, a copy of the foregoing MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION was filed electronically and served by mail upon anyone unable to accept electronic filing. Notice of this filing was will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

GOLDBERG SEGALLA, LLP

By: /s/ Brian T. Stapleton
Brian T. Stapleton, Esq. (CT13418)

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK
Buffalo Division

NEW YORK STATE RIFLE AND PISTOL	:	
ASSOCIATION, INC., <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
v.	:	Civil No.: 1:13-cv-00291
	:	
ANDREW M. CUOMO, <i>et al.</i> ,	:	
	:	
Defendants.	:	

DECLARATION OF MARK OVERSTREET

I, Mark Overstreet, do hereby swear or affirm:

1. I am employed as the Research Coordinator for the National Rifle Association of America, Inc., in Fairfax, Virginia. My duties include collecting data, primarily from United States government sources, but also from consumer reports and market surveys such as the National Shooting Sports Foundation ("NSSF") *Modern Sporting Rifle Comprehensive Consumer Report*),¹ on the production and availability of firearms in the United States, and on numbers of firearm-related background checks conducted through the National Instant Criminal Background Check System (NICS). I offer the following information and data, which is true, accurate and complete according to the best of my knowledge, information, and belief.

2. The following addresses estimated production of AR-15 type rifles from 1986 to the present, annual NICS check numbers and trends, and production of detachable ammunition magazines.

¹ Available online at http://www.nssf.org/MSR/PDF/NSSF_MS_Report2010.pdf.

AR-15 Type Rifle Production

3. The term “Colt AR-15 series” refers to models of a rifle manufactured by Colt’s Defense and its predecessor companies. “AR-15” is commonly used as a generic term to describe the same or similar rifles made by other manufacturers.

4. AR-15 type rifles are semiautomatic, meaning that they are designed to fire only once when the trigger is pulled. They have the capacity to accept a detachable magazine. (Standard magazines hold 20 or 30 rounds of ammunition, but magazines of other capacities are also available). They also have a grip typically $3\frac{3}{4}$ to 4 inches in length that protrudes at a rearward angle beneath the action of the rifle.

5. Colt’s introduced the AR-15 SP-1 in 1963. Production figures for AR-15 type rifles for years 1963-1985 are unavailable. However, since 1986, at least 3.97 million AR-15 type rifles have been manufactured in the United States for the commercial market. The basis of this estimate is set forth below.

6. 1963-1985. Data for these first 23 years of AR-15 production are not reflected herein. Colt’s and other manufacturers produced AR-15s in this time frame.

7. 1986-2011. The Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) has published annual firearm manufacturing and export statistics for the years 1986-2011.² In those years, over 3.3 million AR-15s were made and not exported by manufacturers the AR-15 production of which can be identified from government data sources.³ The following manufacturers, the rifle production of which is limited

² The annual reports for 1998-2011 are available at www.atf.gov/statistics/index.html. Reports for 1986-1997 are available in hard copy from ATF.

³ See attached spreadsheet for annual production per manufacturer. ATF reports do not show model names, but show firearm types (rifle, shotgun, pistol, revolver, and miscellaneous). Manufacturers listed are known to make only or primarily AR-15 type

exclusively or almost exclusively to AR-15s, reported the following numbers of rifles produced during years 1986-2011:

Aero Precision	116,045
Armalite	158,643
Bushmaster	771,492
Colt's	586,258
CMMG	50,473
Daniel Defense	14,163
Double Star	45,396
Del-ton	31,936
DPMS	438,607
Eagle Arms	7,107
Essential Arms	31,552
LMT	10,858
LWRC	23,665
Noveske	3,767
Olympic	129,186
Patriot Ordn.	15,816
PWA	33,807
Rock River	204,215
Sabre Defense	16,373
Sendra	3,301
Smith & Wesson	430,208
Stag Arms	188,703
Yankee Hill	1,230

8. 2011: Proportion of AR-15s Compared to All Firearms and to All Rifles

Manufactured in the U.S. In 2011, there were 6,244,998 firearms (excluding fully-automatic firearms, i.e., machineguns) made in the U.S. and not exported. Of these, 2,238,832 were rifles, including 408,139 AR-15s by manufacturers whose production figures could be discerned from the ATF reports. Thus, AR-15s accounted for at least

rifles. The total is an underestimate, in that it does not include AR-15s made by two major firearm manufacturers—Remington and Sturm, Ruger—the AR-15 production of which cannot be distinguished from their total rifle production within the ATF reports, nor does the estimate include the production of smaller manufacturers of whose AR-15 production we are not aware.

seven percent of firearms, and 18 percent of rifles, made in the U.S. for the domestic market that year.

9. From 1986 through 2011, U.S.-made firearms accounted for 69 percent of all new firearms available on the commercial market in the United States. Even with the inclusion of imported firearms into the above calculations, AR-15s would account for a significant percentage of new firearms available in the United States.

10. 2012-2013 Estimates. The FBI reports that background checks processed through the National Instant Criminal Background Check System (NICS), most of which are conducted for retail purchases of firearms by consumers, increased 14.2 percent in 2011 as compared to 2010, 19.1 percent in 2012 as compared to 2011; and 44.5 percent during the first three months of 2013 as compared to the same period in 2012.⁴

11. If the 2011-2013 trend for AR-15 rifle production was identical to that for NICS checks, it would mean that nearly 660,000 AR-15s were made in the U.S. and not exported during 2012 and the first three months of 2013. That figure, added to the over 3.3 million noted earlier, implies a conservative estimate of 3.97 million AR-15s for the period 1986-March 2013, excluding production by Remington and Sturm, Ruger.⁵ See attached spread sheet.

Magazine Production

12. The following addresses certain aspects of the manufacture and importation of ammunition feeding devices for firearms. Ammunition feeding devices that have a

⁴ FBI monthly and yearly NICS transaction data are available online at <http://www.fbi.gov/about-us/cjis/nics/reports/nics-firearm-background-checks-1998-2013-state-monthly-totals-033113.pdf> and <http://www.fbi.gov/about-us/cjis/nics/reports/total-nics-background-checks-1998-2013-monthly-yearly-totals-033113.pdf>, respectively.

⁵ See *supra*, text accompanying note 2.

capacity of more than 10 rounds of ammunition are primarily detachable box magazines designed for semiautomatic rifles or semiautomatic pistols, or tubular rifle magazines.

13. *Pistol Magazines*. Annual firearm manufacturing and export statistics released by the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") indicate that semiautomatic pistols rose as a percentage of total handguns made in the United States and not exported, from 50 percent of 1.3 million handguns in 1986, to 82 percent of three million handguns in 2011.⁶

14. Standard magazines for very commonly owned semiautomatic pistols hold up to 17 rounds of ammunition. In 2011, about 61.5 percent of the 2.6 million pistols made in the U.S. were in calibers typically using magazines that hold over 10 rounds.

15. In recent decades, the trend in semiautomatic pistols has been away from those designed to hold 10 rounds or fewer, to those designed to hold more than 10 rounds. This tracks with trends among law enforcement personnel. In the days before the widespread adoption of semiautomatic pistols by law enforcement agencies, most law enforcement officers carried five- or six-shot revolvers. Today, police departments typically issue pistols the standard magazines for which hold more than 10 rounds, such as the Glock 17, the standard magazines for which hold 17 rounds.

16. The same trend has developed relative to pistols issued in our armed forces. The standard magazine for our military's Beretta M9 9mm service pistol holds 15 rounds. The M9 replaced the M1911 .45 caliber pistol, the standard magazine for which holds seven rounds.

⁶ The annual reports for 1998-2011 are available at www.atf.gov/statistics/index.html. Reports for 1986-1997 were provided in hard copy form by ATF.


17. Rifle Magazines. Beginning with the M1 Carbine, introduced in the 1940s, rifles equipped with detachable magazines holding more than 10 rounds have been increasingly common. There are about two million privately owned M1 Carbines, the standard magazines for which hold 15 or 30 rounds. As noted above, excluding those manufactured between 1963 and 1985, and those of major manufacturers Remington and Sturm Ruger, manufactured more recently, there are approximately four million AR-15 type rifles owned within the United States. AR-15s have always typically been sold with between one and three 20-round or 30-round magazines. Ruger Mini-14 series rifles, which may outnumber M1 Carbines and AR-15s combined, have the capacity to accept magazines that hold more than 10 rounds, and many are equipped with such magazines. Numerous other rifle designs use magazines holding more than 10 rounds.

18. Magazine Production Data. It is not known how many magazines are made or imported each year. ATF does not require manufacturers to report magazine production. In addition to magazines sold with firearms, additional magazines are widely available on the open market.

19. Estimates are set forth in Christopher S. Koper, *An Updated Assessment of the Federal Assault Weapons Ban: Impacts on Gun Markets and Gun Violence, 1994-2003* (Report to the National Institute of Justice, U.S. Dep't. of Justice 2004), available at http://www.sas.upenn.edu/jerrylee/research/aw_final2004.pdf. Koper reported that, as of 1994, 18 percent of civilian-owned firearms, including 21 percent of civilian-owned handguns, were equipped with magazines holding over ten rounds, and that 25 million guns were equipped with such magazines. *Id.* at 1. Some 4.7 million such magazines were imported during 1995-2000. *Id.*

20. Koper further reported that, as of 1994, 40 percent of the semiautomatic handgun models and a majority of the semiautomatic rifle models manufactured and advertised before the ban were sold with, or had a variation that was sold with, a magazine holding over 10 rounds. *Id.* at 6.

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

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

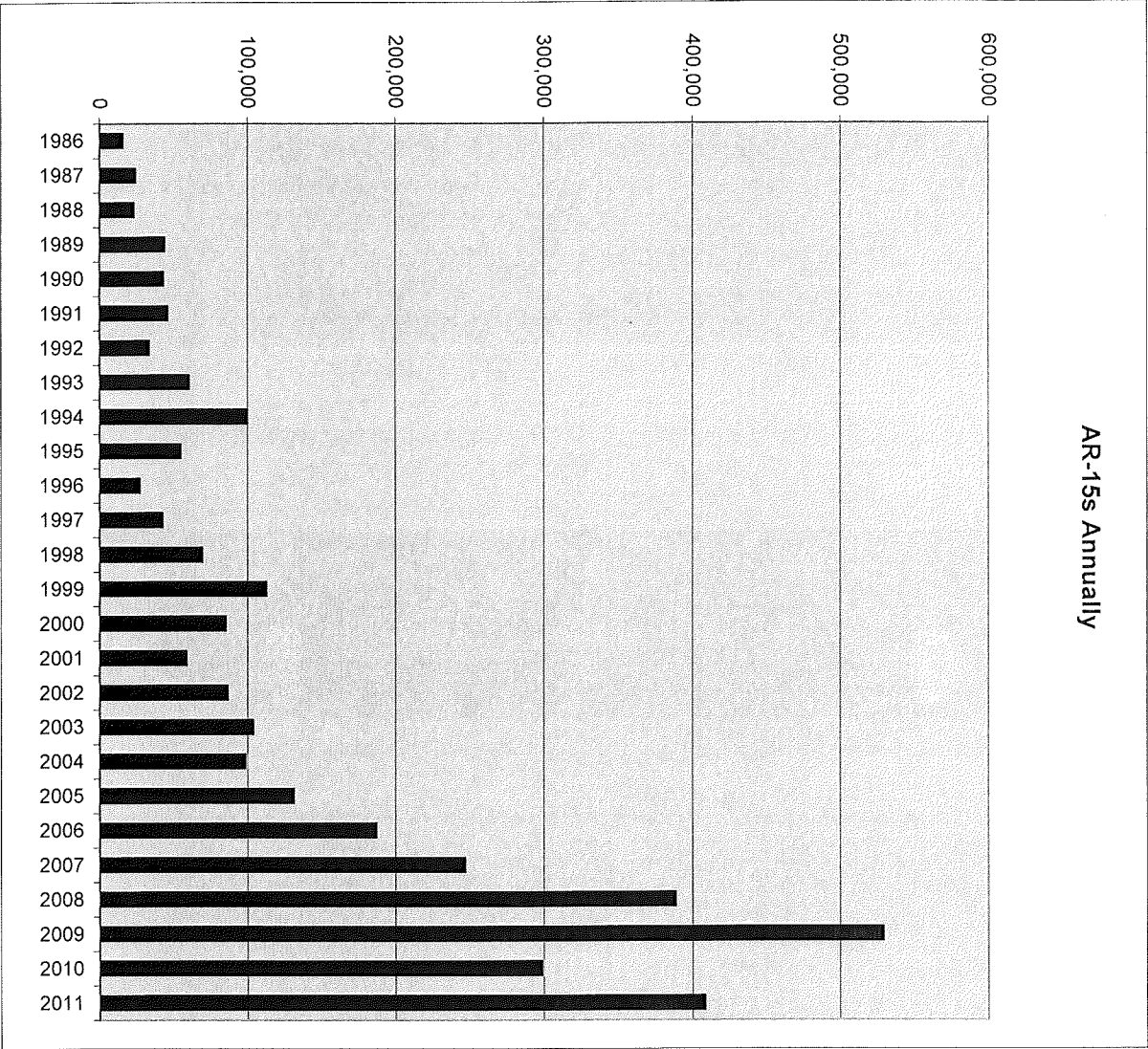
MARK OVERSTREET

Date: April 15, 2013

AR-15 type rifle production, minus export, selected manufacturers, 1986-2011
 Data source: Bureau of Alcohol, Tobacco, Firearms and Explosives

	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998
Aero Precision													
Armaliite													
Bushmaster			1,235	982	2,119	1,665	1,179	1,822	24,868	1,194	2,658	5,420	6,557
Colt's	12,359	18,950	16,649	14,639	35,936	35,178	25,853	48,798	49,436	48,628	13,883	20,924	29,564
CMMG													
Daniel Defense													
Double Star													
Del-ton													
DPMS							11	83		104	159	1,358	3,678
Eagle Arms		477	495	4,071	606	982	476						
Essential Arms	1,870	1,213	2,151	10,241		6,169	2,520	2,798					
LMT													
LWRC													
Noveske													
Olympic			2,520	5,648	257	236	1,593	3,035	14,441	1,357	2,124	3,937	4,325
Patriot Ordn.													
PWA		2,317		7,753	4,053	1,613	1,527	3,702	10,864	1,978			
Rock River													
Sabre Defense													
Sendra	1,539	1,277		485									
Smith and Wesson													
Stag Arms													
Yankee Hill													
Annual Total	15,768	24,234	23,050	43,819	42,971	45,843	33,159	60,236	99,609	54,502	27,016	42,421	69,222
Running total	15,768	40,002	63,052	106,871	149,842	195,685	228,844	289,080	388,689	443,191	470,207	512,628	581,850

	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	Total
					676	610	859	4356	9993	12938	27,109	19,939	39,565	116,045
7,946	8,247	8,163	10,841	12,903	9,729	7,349	10,475	12,060	14,880	16,814	16,814	9,472	12,113	158,643
64,374	39,926	31,179	44,795	45,286	44,028	65,001	57,031	57,273	85,307	81,290	40,568	38,075	771,492	
25,533	27,271	7,866	13,616	17,364	13,165	2,210	8,480	10,635	20,518	14,237	7,663	8,165	14,802	586,258
						327	2,161	2,265	15,655	4,839	2,413	6,911	14,163	
					1,312	1,435	3,534	6,884	22,426	5,864	2,321	1,620	45,396	
									2,037	19,369	5,676	4,854	31,936	
6,834	5,541	4,666	7,630	5,543	11,389	21,923	47,435	58,269	94,553	83,129	46,891	39,411	438,607	
						450	1,089	3,051	1,599	2,749	9,100	6,137	4,998	31,552
						2	144	275	289	2,749	9,100	6,137	5,671	10,858
							6	43	0	770	750	748	1,437	23,665
7,404	3,653	5,379	6,884	7,005	6,395	8,227	7,319	7,593	9,829	12,089	2,892	5,044	129,186	
						19	43	0	3,052	8,418	947	918	15,816	
													33,807	
330	191	1,244	2,362	14,690	8,742	12,816	17,538	22,625	28,083	38,756	23,146	33,692	204,215	
					295	1,502	1,268	3,027	4,934	5,347			16,373	
													3,301	
						2,008	7,837	4,635	24,585	37,025	108,879	98,379	156,705	430,208
							21,902	25,415	31,400	47,555	18,563	34,023	188,703	
						5	9	81	837	56	107	135	1,230	
112,421	84,829	58,497	86,128	103,467	98,125	130,749	186,461	246,526	388,592	528,751	298,266	408,139	3,312,801	
694,271	779,100	837,597	923,725	1,027,192	1,125,317	1,256,066	1,442,527	1,689,053	2,077,645	2,606,396	2,904,562	3,312,801		



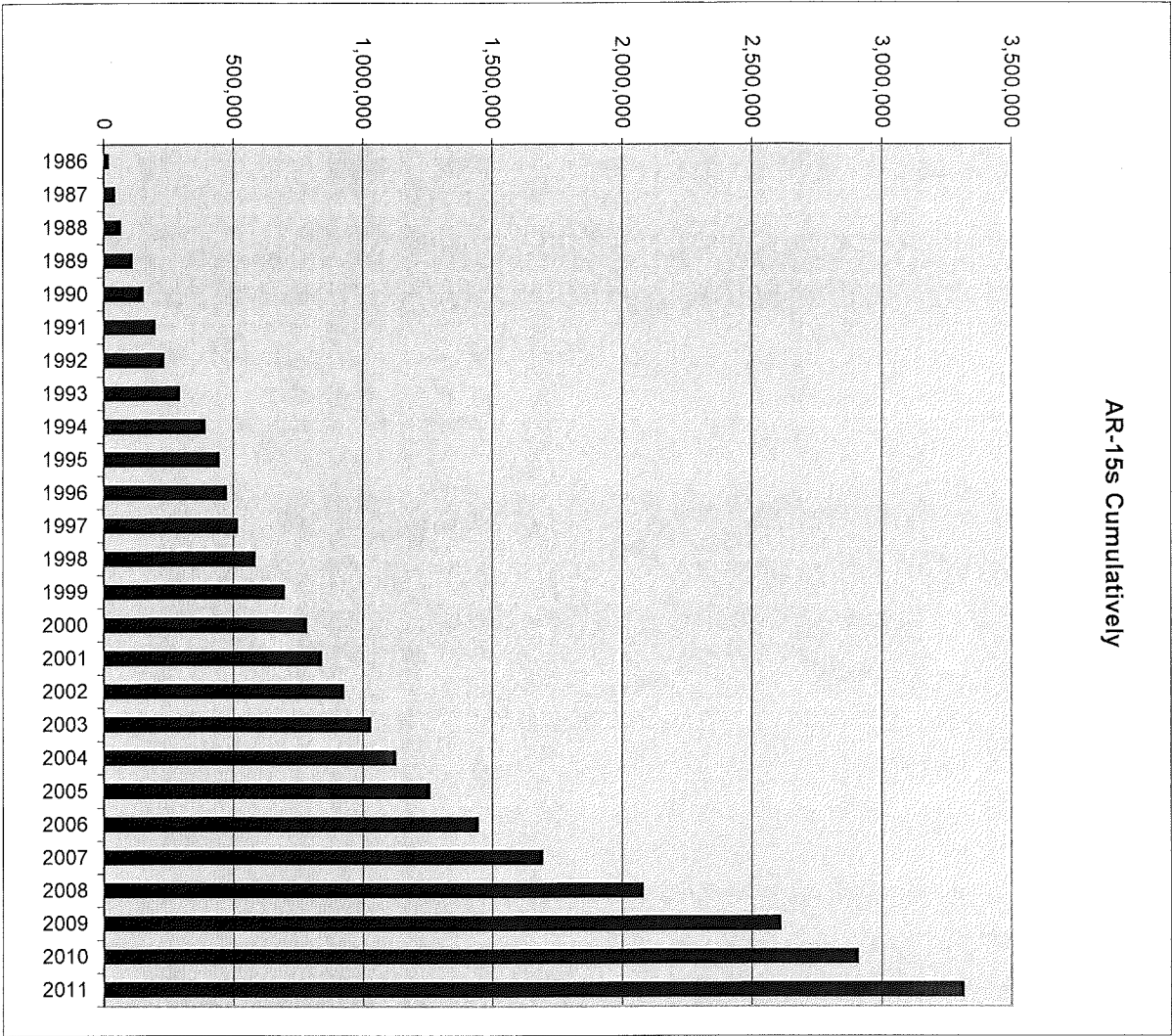


EXHIBIT B
(1 of 3)

MODERN SPORTING RIFLE (MSR)

COMPREHENSIVE CONSUMER REPORT 2010

OWNERSHIP, USAGE AND ATTITUDES TOWARDS MODERN SPORTING RIFLES

NATIONAL SHOOTING
SPORTS FOUNDATION



Conducted for the National Shooting Sports Foundation
by Sports Marketing Surveys


Sports Marketing Surveys
Exclusive Source for SGMA Research

WWW.NSSF.ORG



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About NSSF:

The National Shooting Sports Foundation is the trade association for the firearms industry. Its mission is to promote, protect and preserve hunting and the shooting sports. Formed in 1961, NSSF has a membership of more than 6,000 manufacturers, distributors, firearms retailers, shooting ranges, sportsmen's organizations and publishers. For more information please visit; www.nssf.org

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1 METHODOLOGY

The Modern Sporting Rifle (MSR) Consumer Study employed an online survey methodology. With no database available of known MSR owners, NSSF promoted participation in this study via online banner ads on various websites, blogs and e-newsletters geared toward firearm ownership and hunting such as:

- AR15.com
- ARGunsandHunting.com
- FieldandStream.com
- GunDigest.com
- GunsandAmmo.com
- OutdoorLife.com
- RifleShooter.com
- ShootingTimes.com
- NSSF Facebook and YouTube pages
- NSSF/GunBroker *Pull the Trigger* e-newsletter

A contest to win one of three \$500 Cabela's gifts cards was included as an incentive to complete the study in full. The term Modern Sporting Rifle was clearly defined as AR-platform rifles such as an AR-15, tactical rifles and black guns. Photographs of MSR's were also shown on the survey landing page as well as at the beginning of the survey. A 60 second video was made available prior to taking the survey that clearly defined the term Modern Sporting Rifle (MSR) and clarified that the survey was specifically for owners of at least one MSR. The video promoted the study as a chance for respondents to offer insight and help shape the future of the tactical market.

To further pair down response to those that would correctly complete the survey, the survey's initial question asked: "Do you own at least one Modern Sporting Rifle? (If you do not own a Modern Sporting Rifle but would still like to be entered in the contest, please select "No".) These safeguards narrowed the completed responses from 11,417 to 7,372 to help insure data accuracy.

The Confidence Interval for the full "MSR Owner" sample of 7,372 ranges from +/- 0.51 percentage points to +/- 1.16 percentage points at the 95% confidence level. So for example, if the survey shows 50% of MSR owners shoot at ranges, we can be confident 95 times out of 100 that the real value lies within +/- 1.16 p.p so between 48.84% and 51.16%. Or to put it another way: Less than 5 times out of 100 would we expect to find a difference of more than 1.16 percentage points due to sampling.

Survey was live August 15 through November 15, 2010.

2 EXECUTIVE SUMMARY

The National Shooting Sports Foundation (NSSF) contracted with Sports Marketing Surveys in 2010 to conduct a large consumer study to learn more about the category of Modern Sporting Rifle (MSR) consumer ownership and usage. Prior to the start of the survey, NSSF gathered input from a panel of industry leaders and experts from manufacturing, retailing, and law enforcement/military backgrounds to ensure that correct questions were asked so that the study would result in providing a detailed report of previously unavailable data for this segment. NSSF thanks all those that helped in creating and promoting this study.

The study was conducted using an Internet based methodology. Banner ads and links were posted on many of the popular consumer oriented web sites within the firearms industry in order to solicit responses. An incentive was used in order to facilitate this process. At the end of the three month fielding period, more than 11,400 total responses were received of which, more than 7,300 came from verified MSR owners. This response was a significant increase from the original projections of 1,000 -1,500 responses. This large response meant that a number of very specific survey cross tabs to review differences among MSR owners were able to be performed.

Due to the large response rate, the survey was able to examine a wide variety of data points from ownership, usage and future purchase intentions. When it comes to MSR ownership, 12% of the owners made their initial MSR purchases during 2010. For those that own multiple MSRs (3+), 33% of them made their initial purchase prior to 1994. Older owners (age 65+) show a decreased interest or demand for new MSR purchases in the coming year. The top MSR accessories or planned upgrades are rangefinders and trigger upgrades followed by scopes, other optics and sound suppression.

The top reasons why consumers own a MSR are; recreational target shooting, home defense, collecting and hunting. 9 out of 10 MSR owners owned a handgun prior to acquiring their first MSR. Overall, approximately 99% of all MSR owners owned some type of firearm prior to their first MSR purchase. 37% of MSR owners come from a military background. The largest source of initial interest for MSR ownership was a personal decision. 81% of all MSR purchases are new versus used or as a gift from someone. The average price for all MSR firearms purchases was \$1,083.

The biggest single source of MSR purchases comes from independent firearms retailers with almost 40% of all purchases coming from that channel of business. 10% come from Gun Shows while 25% are made via the Internet and/or mail order.

When it comes to aftermarket accessories for their MSR, the owners of 3+ MSRs lead the way as 25% of these owners describe their MSR(s) as heavily (4+) accessorized. About 65% of all users have between 1-3 accessories while 16% use their MSR the way it came from the store or "out of the box". The majority of these aftermarket accessories are purchased with the first 12 months of ownership. Around a quarter of these owners made accessory purchases at the time of the initial purchase. After 12 months of purchase the likelihood of accessories being purchased drops off significantly. The average amount of money spent on accessories for MSRs for all usage levels is \$436.00

95% of all MSR owners have used their MSR at least once during the course of the previous 12 month period. Of the 95% that used their MSR during the last 12 months, approximately 20% participated in some form of hunting related activity.

25% of all MSR owners fired over 1,000 rounds over the past year with 32% of MSR owners expecting to fire more in the coming 12 months. The average number of rounds fired in the last 12 months by MSR owners is 1,056.

76% of all MSR owners say they generally prefer to shoot with at least one person when they go out to use their MSR while 20% generally go alone.

Please contact Jim Curcuruto jcurcuruto@nssf.org, NSSF Director, Industry Research & Analysis with any questions pertaining to this study.

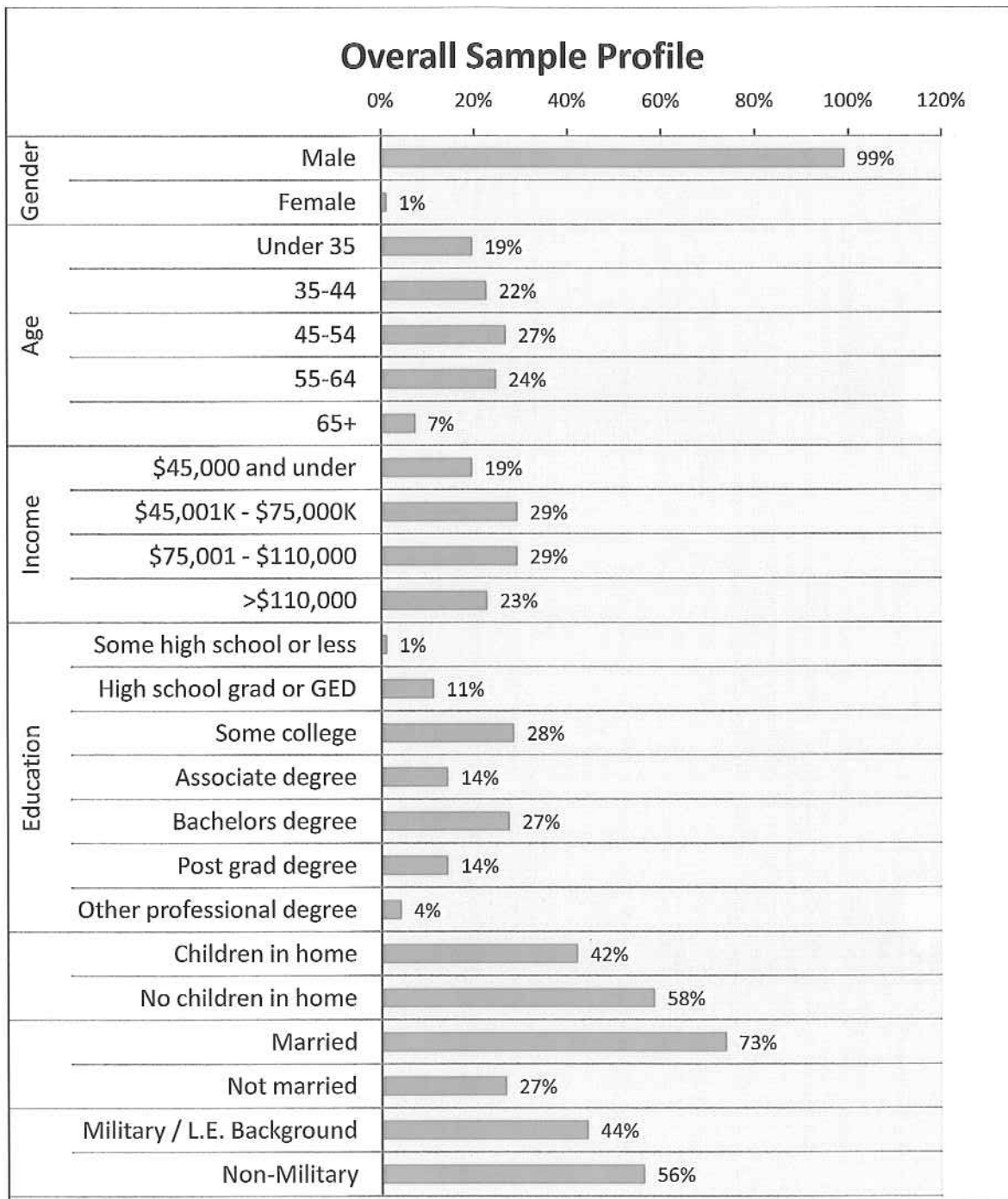
3 FAST FACTS

1. 60% of MSR owners that responded to the study own multiple MSRs.
2. Those who shoot often are much more likely to own multiple MSRs. 3 out of 4 who shoot twice a month or more own multiple MSRs.
3. 30% of all MSR owners purchased their first rifle in 2009 or 2010. One-third of those who own 3 or more MSRs purchased their first MSR prior to 1994.
4. 9 out of 10 MSR owners owned a handgun prior to owning an MSR. 34% of those under the age of 35 owned a paintball gun before owning their MSR.
5. 20% of shooting range members first gained interest in MSRs at a shooting range. About ¼ of all MSR owners first gained interest in MSRs in the military.
6. Nearly half (44%) of MSR owners are current or former military/law enforcement.
7. 51% of MSR owners are shooting range members. Range membership among MSR owners steadily increases with age and income.
8. 8 out of every 10 MSR owners purchased their MSR new. Those who own only one MSR are a bit more likely to purchase used than those who own multiple MSRs.
9. 2/3 of all MSR owners obtained their most recent MSR in 2009 or 2010 while only 12% received their most recent MSR in 2005 or earlier. Half of those who own 3+ MSRs and half of those who shoot 2+ times/month received their most recent MSR in 2010.
10. 52% of MSR owners paid under \$1,000 for their MSR. 56% of those who shoot 2+ times/month paid \$1,000 or more for their most recent MSR.
11. 39% of all MSR owners purchased their most recent MSR at an independent retail store.
12. 3 out of every 4 MSRs most recently purchased were chambered in .223/5.56mm.
13. MSR owners consider accuracy and reliability to be the two most important things to consider when buying a MSR. Owners did not consider their friends/family having one to be important.
14. 84% of MSR owners have at least one accessory on their rifle or do not shoot "out of the box". Younger, (under 35 years of age), shooters are more likely than older shooters to accessorize their rifle. 62% of owners accessorize their rifle after their purchase but within 12 months after purchasing it.
15. Those most likely to spend \$600+ on aftermarket customizations are: 3+ MSR owners, 2+ times/month shooters, under 35 year olds, and those with \$110k+ HH income. Those spending the least include those who own only 1 MSR and 65+ year olds.
16. 71% of MSR owners use a scope or red dot as their primary optic. Older shooters tend to use a scope as their primary optic more than younger, (under 35 years of age), shooters. Younger shooters prefer a red dot as a primary optic more than older shooters.
17. 1/3 of all MSR owners use a 30-round magazine the most in their MSR. Younger MSR owners are more likely to use higher capacity magazines than older MSR owners.
18. 60% of MSR owners use a collapsible/folding stock but this usage rate decreases with age.
19. Nearly 7 out of 10 of the most recent MSRs purchased had flat top upper receivers.
20. MSR owners are pretty evenly split on having rails or not having rails on their MSR.
21. Black is by far the most popular finish color with 83% of owners saying their most recent MSR is black.

22. Of the most recent MSRs purchased, 62% had a threaded barrel, 64% had a flash hider, 54% had a 16" barrel, and 62% operate on a direct gas impingement.
23. Those most likely to purchase a MSR in the next 12 months are: 3+ MSR owners, 2+ times/month shooters, and younger, (under 35 years of age), owners.
24. The 3 most owned accessories are: rifle sling (81%), soft carrying case (70%), and mounted rifle scope (68%). The top 3 that MSR owners intend to buy are: trigger upgrades, range finder, and sound suppressor.
25. Recreational target shooting (8.9/10.0) was the #1 rated reason for owning a MSR in terms of importance. Home defense was 2nd at 7.7. Professional use / job related was the least important at 2.4.
26. 95% of owners have used their MSR in the last 12 months. Usage slightly decreases with age going from 98% usage rate for under 35's to 92% for those 65+.
27. 29% of MSR owners shoot their MSR more than once per month. .
28. 34% of MSR owners shot more than they did the previous year; 82% said they shot more or the same amount compared to the previous year.
29. 44% of owners shoot at a public range and 44% shoot at a private range. Private range usage increases with age, income, # MSRs owned, and shooting frequency.
30. MSR owners use "budget" factory loads 42% of the time while premium loads account for 25%, reloads 21%, and import ammo 12%. Those who shoot more often are much more likely to reload.
31. 25% of owners shot over 1,000 rounds out of their MSR in the last 12 months. 32% of range members and 20% of non-members shot over 1,000 rounds in the last 12 months. 32% of all owners anticipate shooting over 1,000 rounds in the next 12 months.
32. 43% of owners buy 500+ rounds of ammo at one time. Frequent shooters and multiple MSR owners are most likely to buy 500+ rounds at one time.
33. 45% of owners reload at least some of their ammo. Reloading is more popular with older shooters, range members, and multiple MSR owners.
34. 7 out of 10 reloaders reload 50% or more of their ammo; 32% reload 90% or more.
35. 86% participated in rifle target shooting and 72% participated in handgun target shooting in the last 12 months.
36. The most popular distance to hunt/target shoot with an MSR is 100-300 yards with 63% of owners shooting at those distances. 29% shoot at less than 100 yards. Younger shooters tend to shoot at shorter distances than older shooters.
37. 20% of MSR owners go shooting alone. Older, (over 35 years of age), shooters are more likely than younger shooters to shoot alone.
38. 8 out of 10 MSR owners feel they have not been able to shoot their MSR as much as they would like in the last 12 months.
39. Not having enough free time and the cost of ammo are the 2 main issues preventing MSR owners from shooting as much as they would like. The cost of ammo is much more important to younger shooters than it is to older shooters.
40. The typical MSR owner is 35+ years old, married, and has at least some college education. 52% have a HH income of \$75,000+ and 58% do not have children living with them.

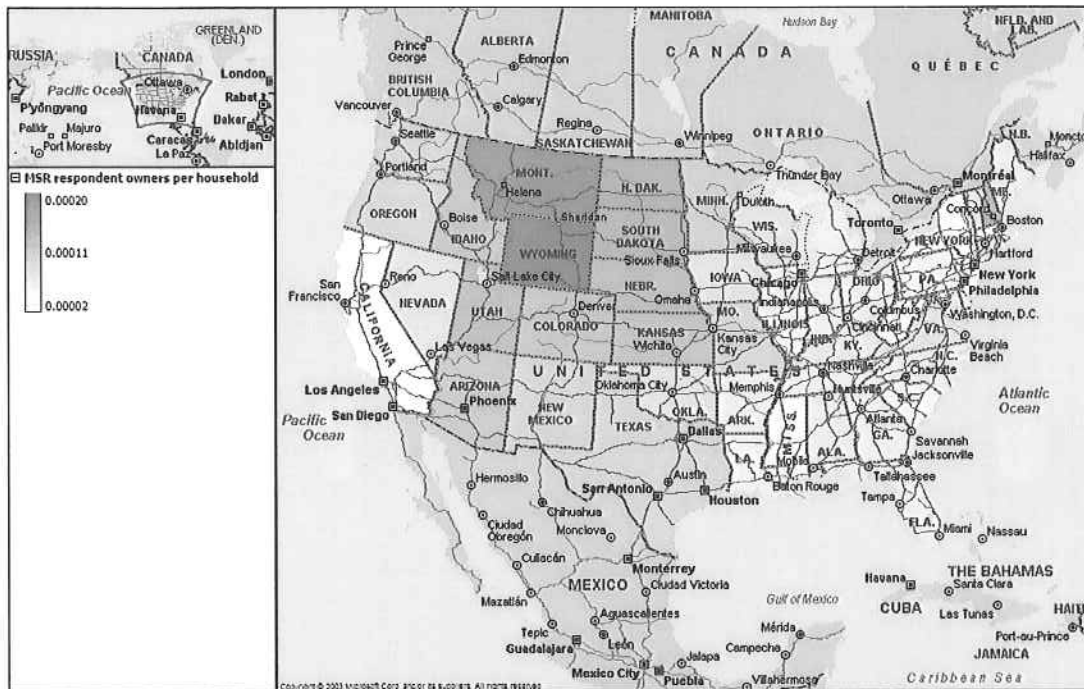
4 SAMPLE PROFILE

4.1 Overall profile of MSR owners

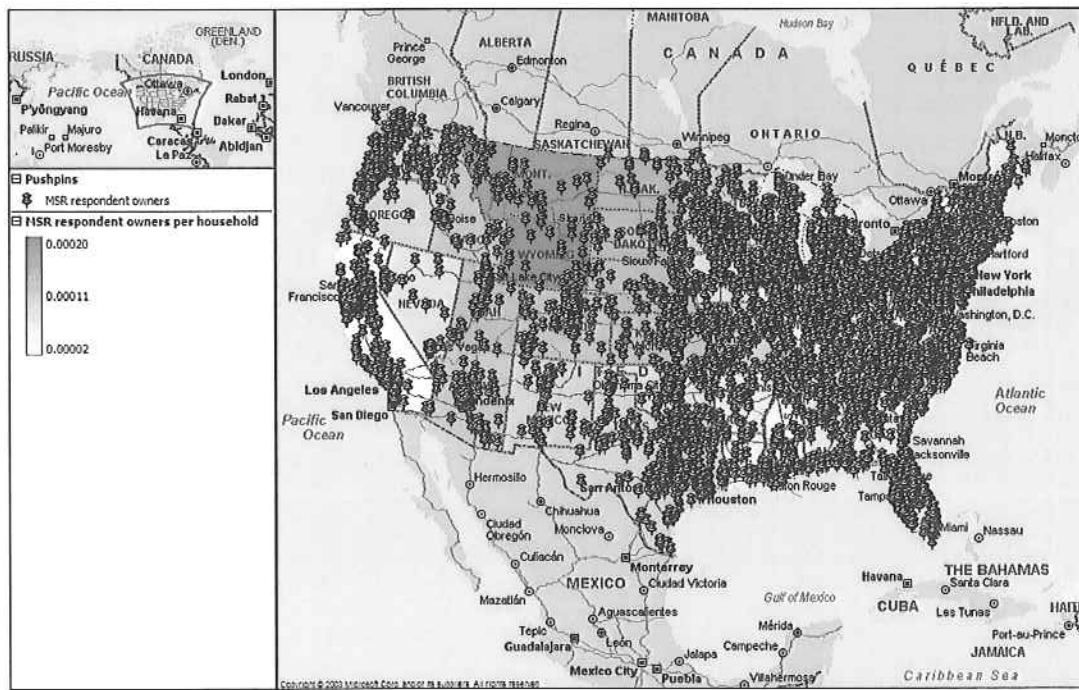


4.2 Geo-Analysis

The following map shows the number of MSR owners per household that responded to the survey. It shows Montana and Wyoming as the most responsive on a per household basis.



In terms of total respondents the following map shows a pushpin per respondent.



4.3 Military / Law Enforcement Background

The following table shows the percentage of MSR owners that are active/veterans of military and law enforcement.

Military / Law Enforcement	
All MSR Owners (Base 7,372)	100%
Military Background	37%
L.E. Background	15%
Either a Military Background or a Law Enforcement Background	44%

*For those with a military background, the following table shows the split between active/veteran and the branch of military:

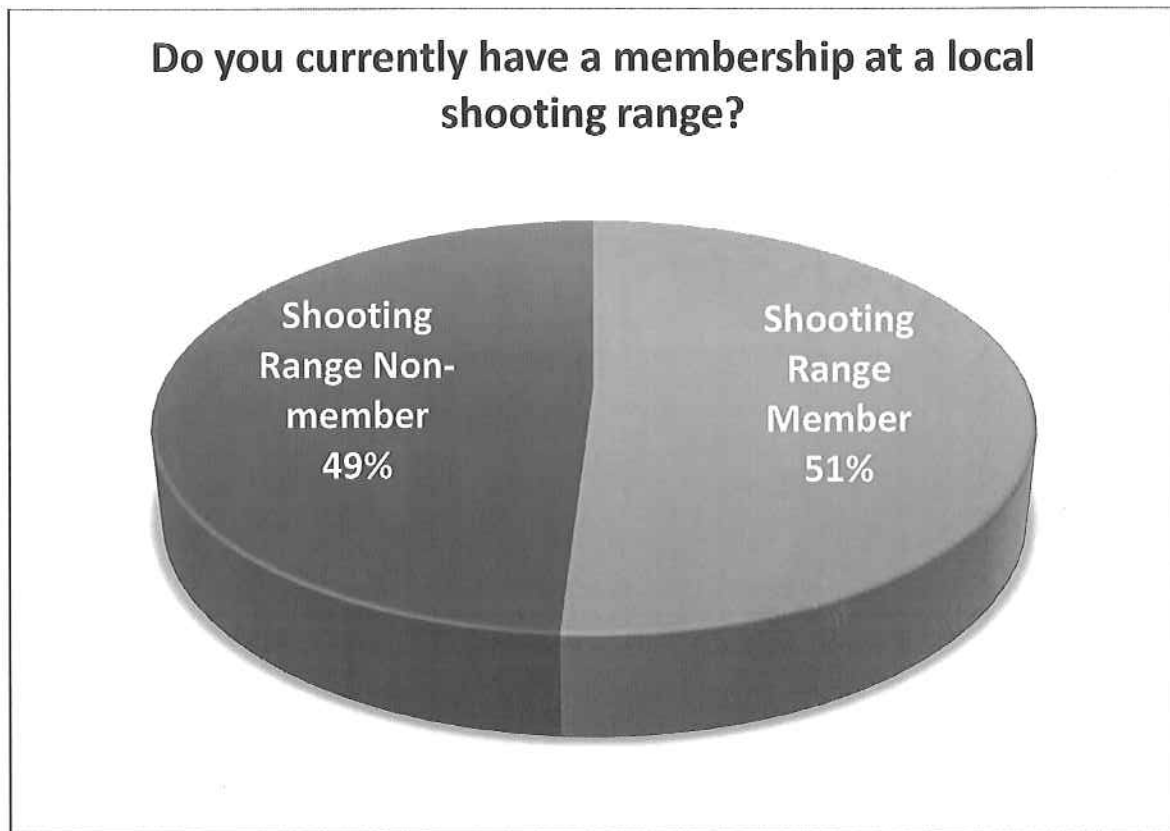
Military Background	
Military Active	13%
Military Veteran	87%
Military Branch	
Army	42%
Navy	20%
Air Force	21%
Marines	14%
National Guard	11%
Coast Guard	3%
Reserves	10%

*For those with a law enforcement background, the following table shows the split between active/veteran and the branch of law enforcement:

Law Enforcement	
L.E. Active	50%
L.E. Veteran	50%
L.E. Branch	
Local	63%
State	18%
Federal	18%
Other	12%

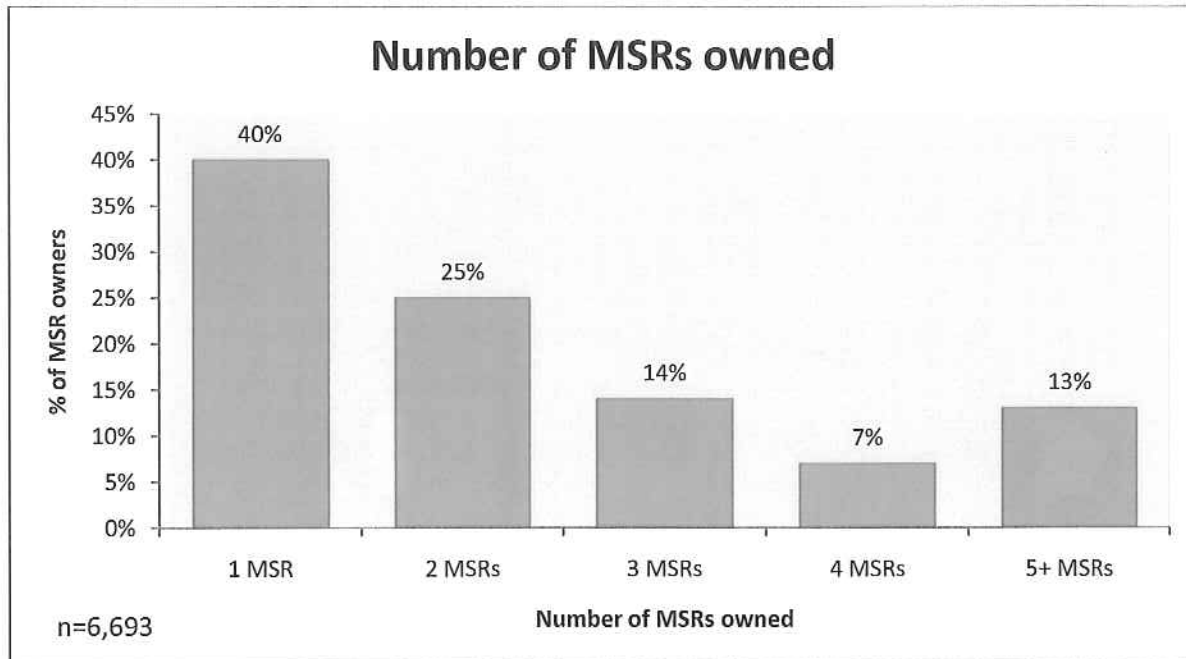
*The numbers in these tables do not add up to 100 due to duplication of responses.

4.4 Range Membership



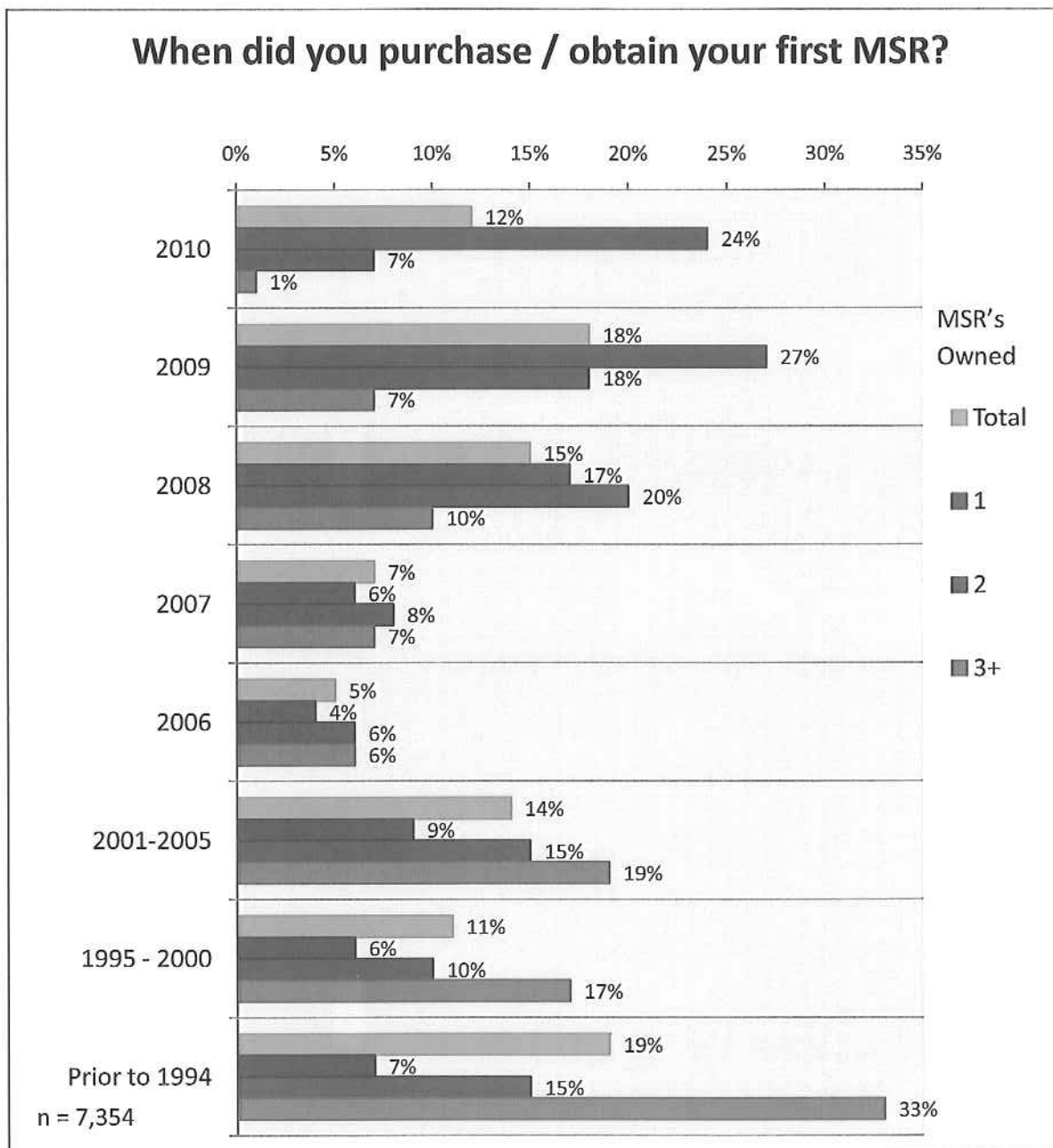
5 MSR BUYING PROCESS

5.1 Number of MSRs owned



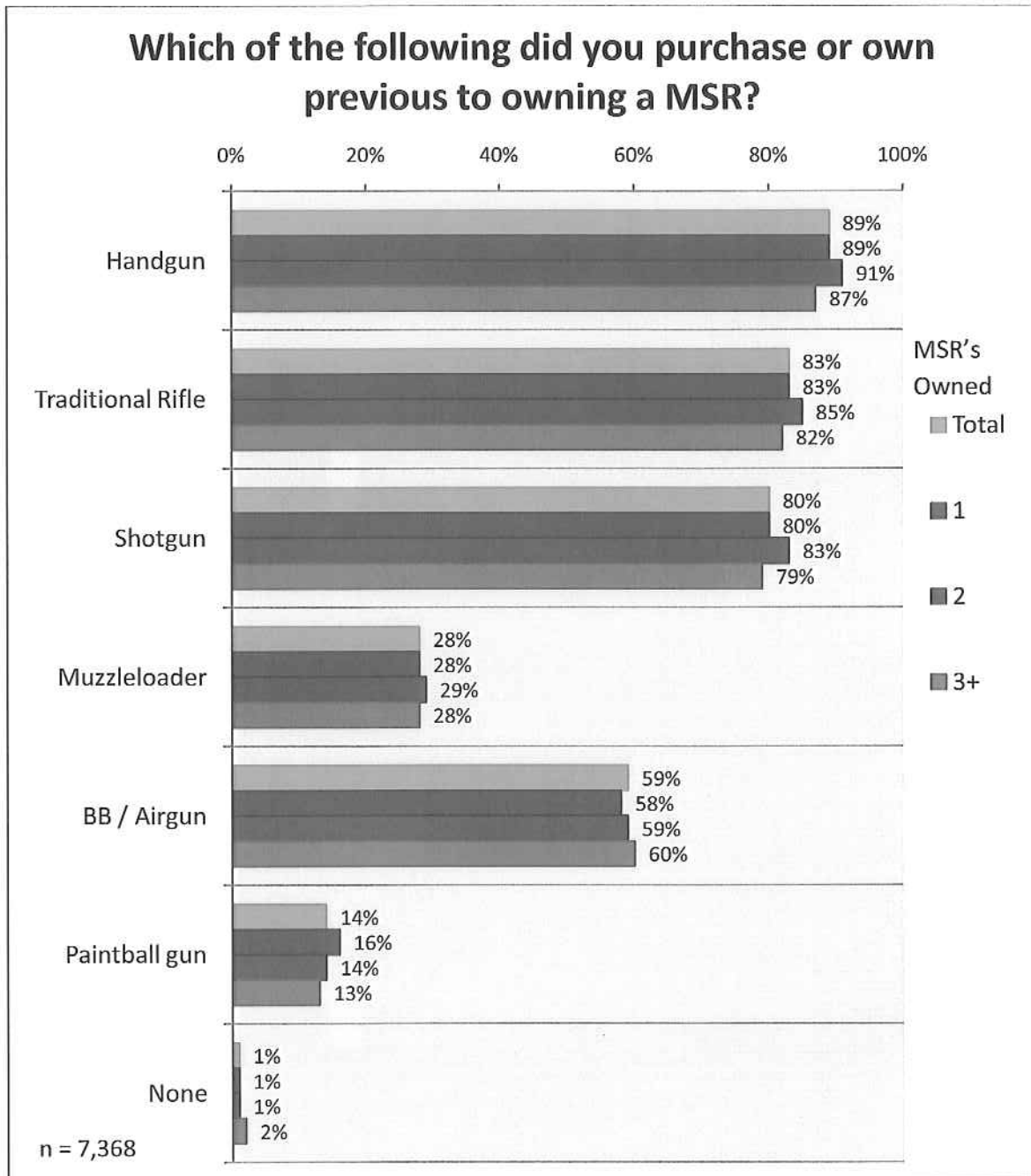
- 40% of owners own a single MSR.
- The average number owned is 2.58 MSRs.

5.2 First MSR purchased



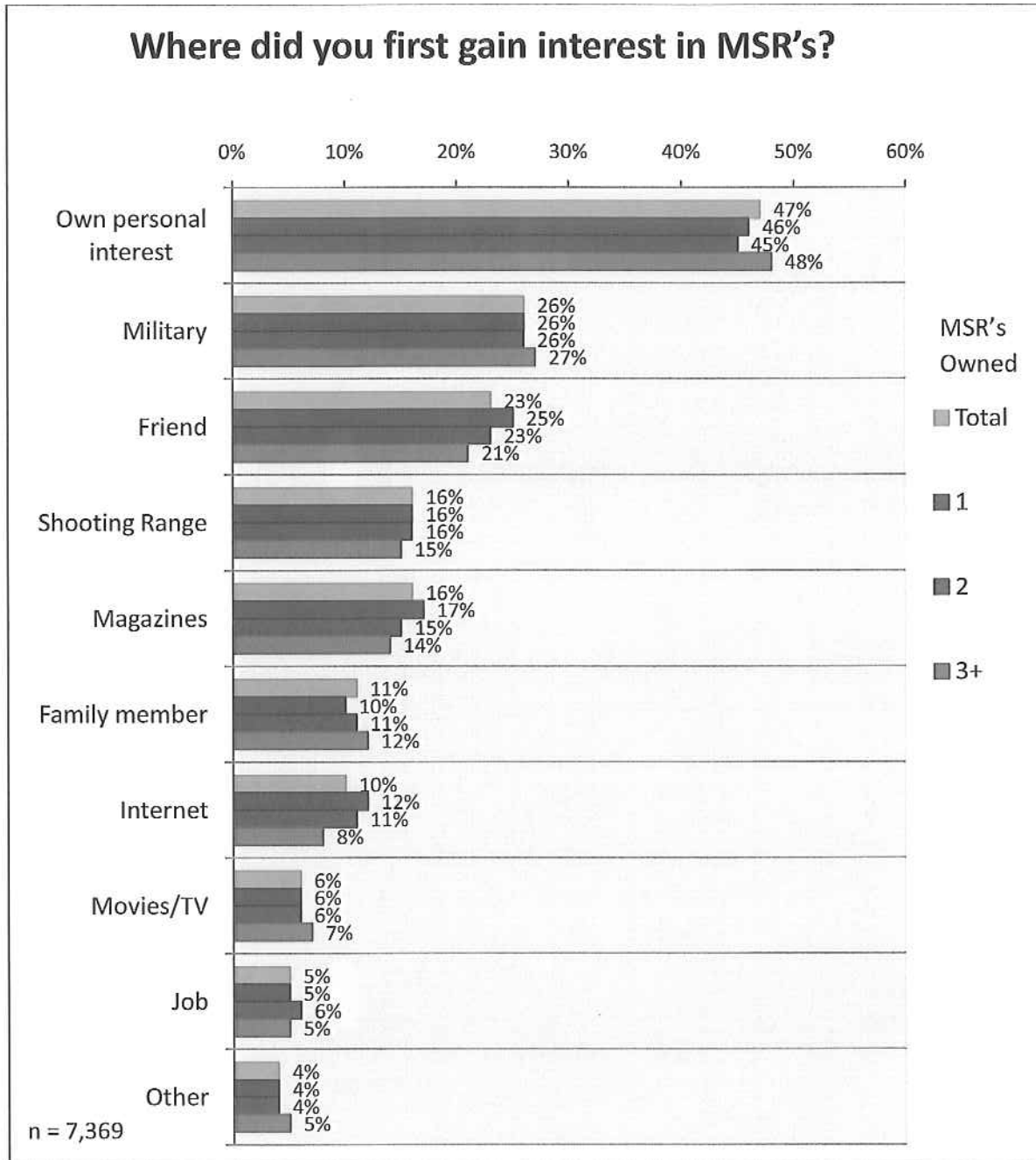
- 12% of MSR owners first purchased an MSR in 2010
- Those who own 3 or more MSRs have been owners for a long time, with one-third first buying prior to 1994.

5.3 Firearms owned prior to MSR ownership



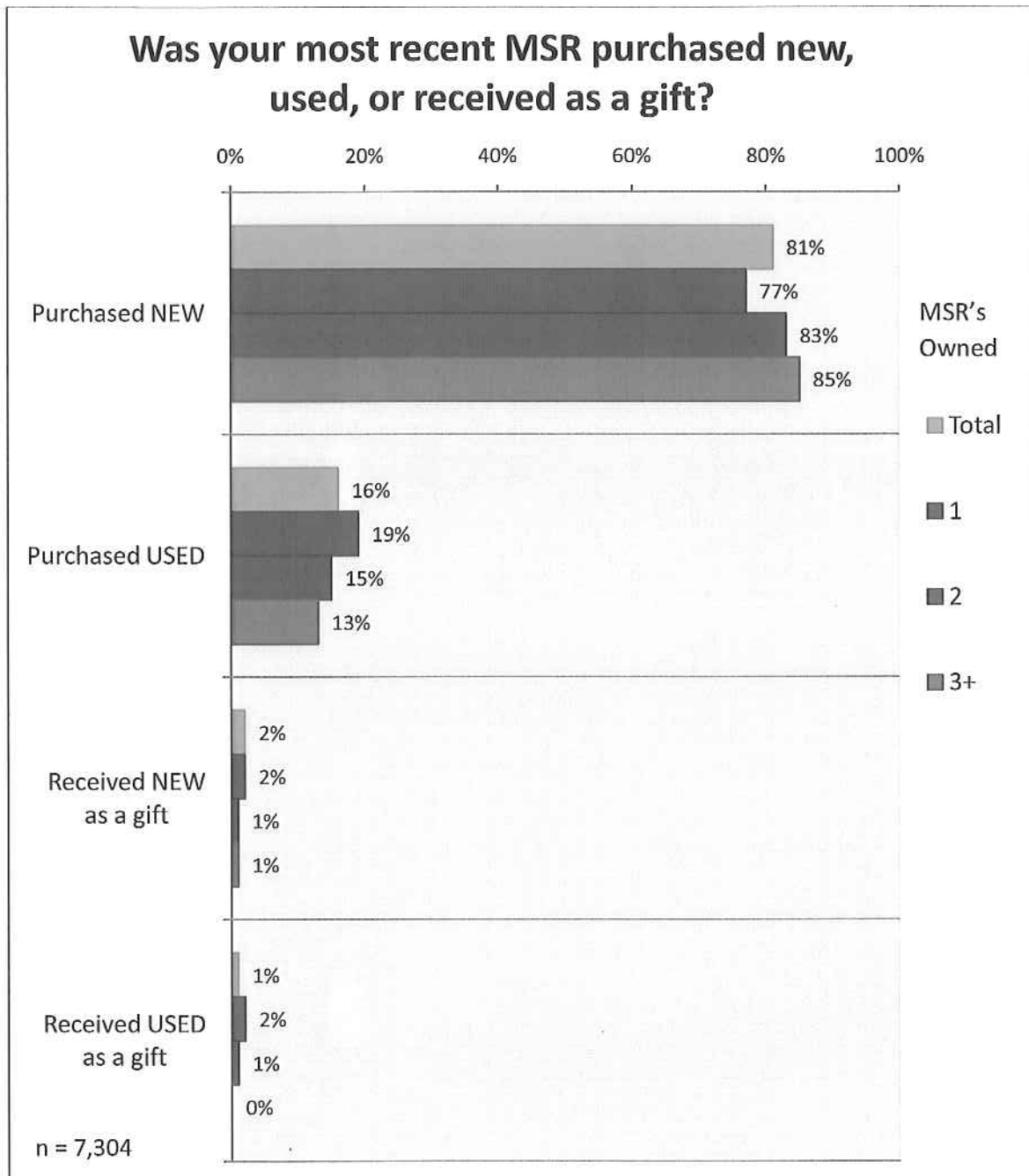
- 9 out of 10 MSR owners had a handgun before owning their MSR.

5.4 Interest gained in MSR



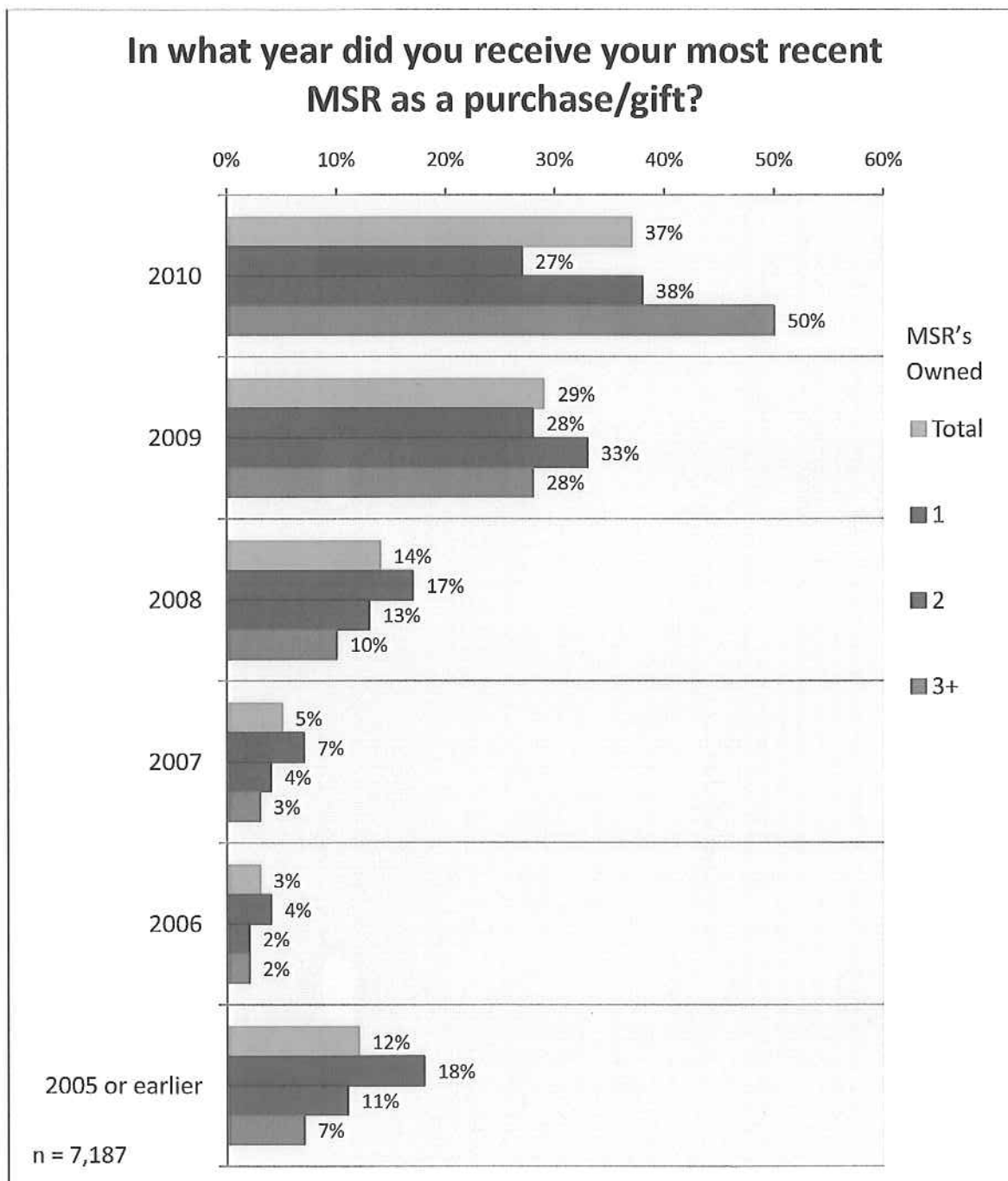
- Own personal interest and military background were the most important influencers.

5.5 New vs Used



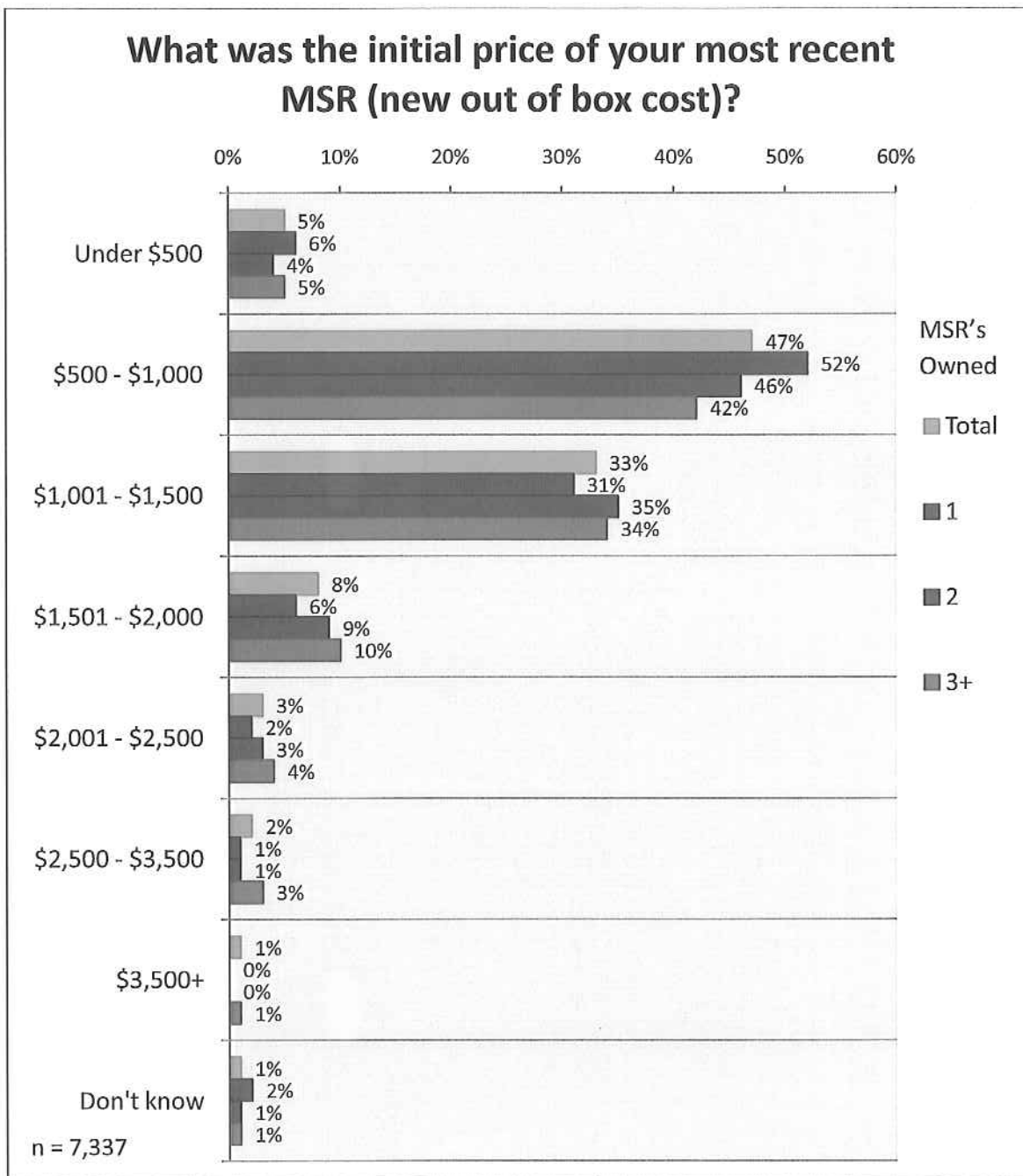
- 81% of most recent MSR purchases were made NEW.

5.6 Year of purchase



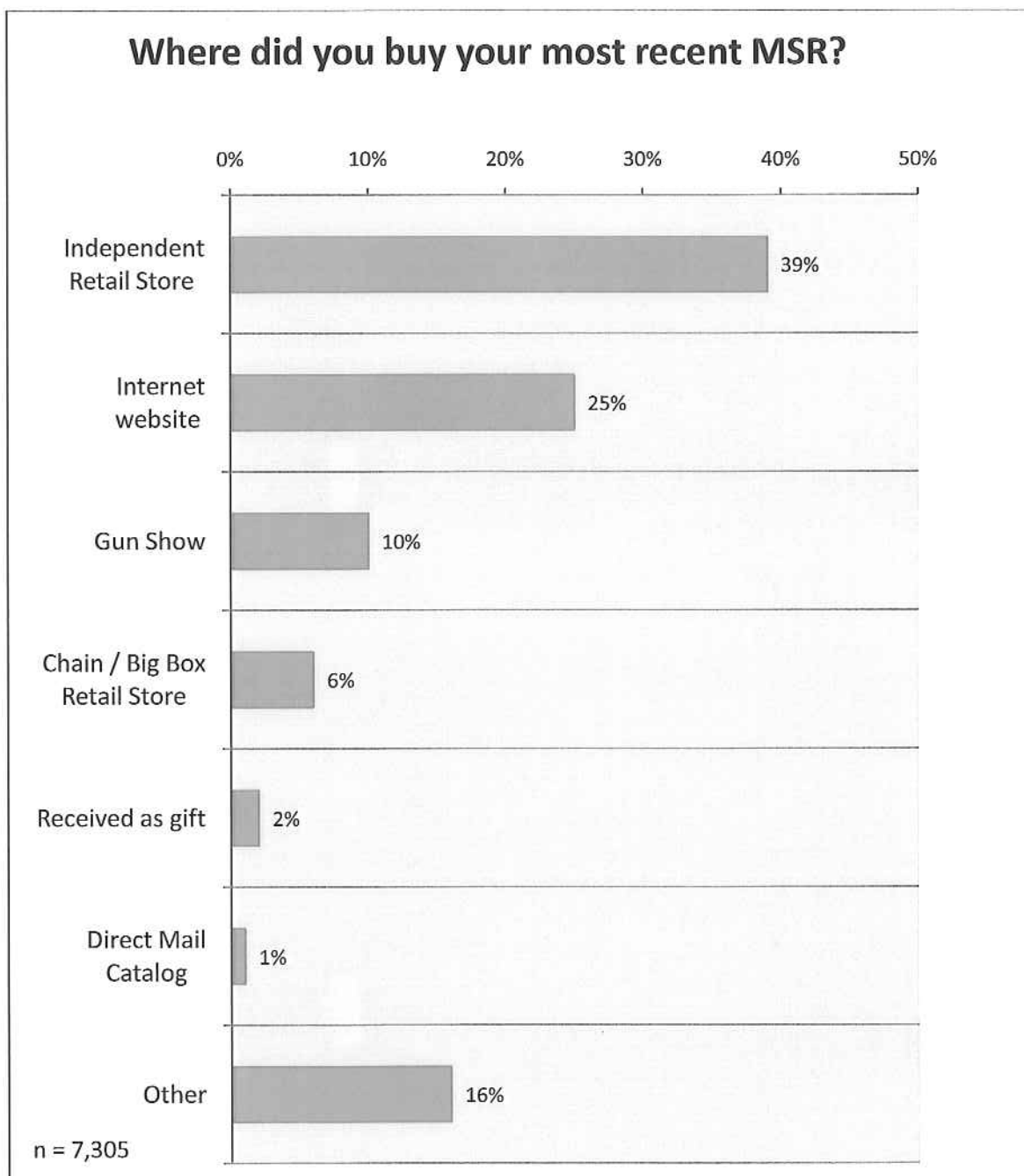
- 37% of MSR owners obtained their most recent MSR in 2010. For those owning 3 or more MSRs, 50% obtained an MSR in 2010.

5.7 Price paid



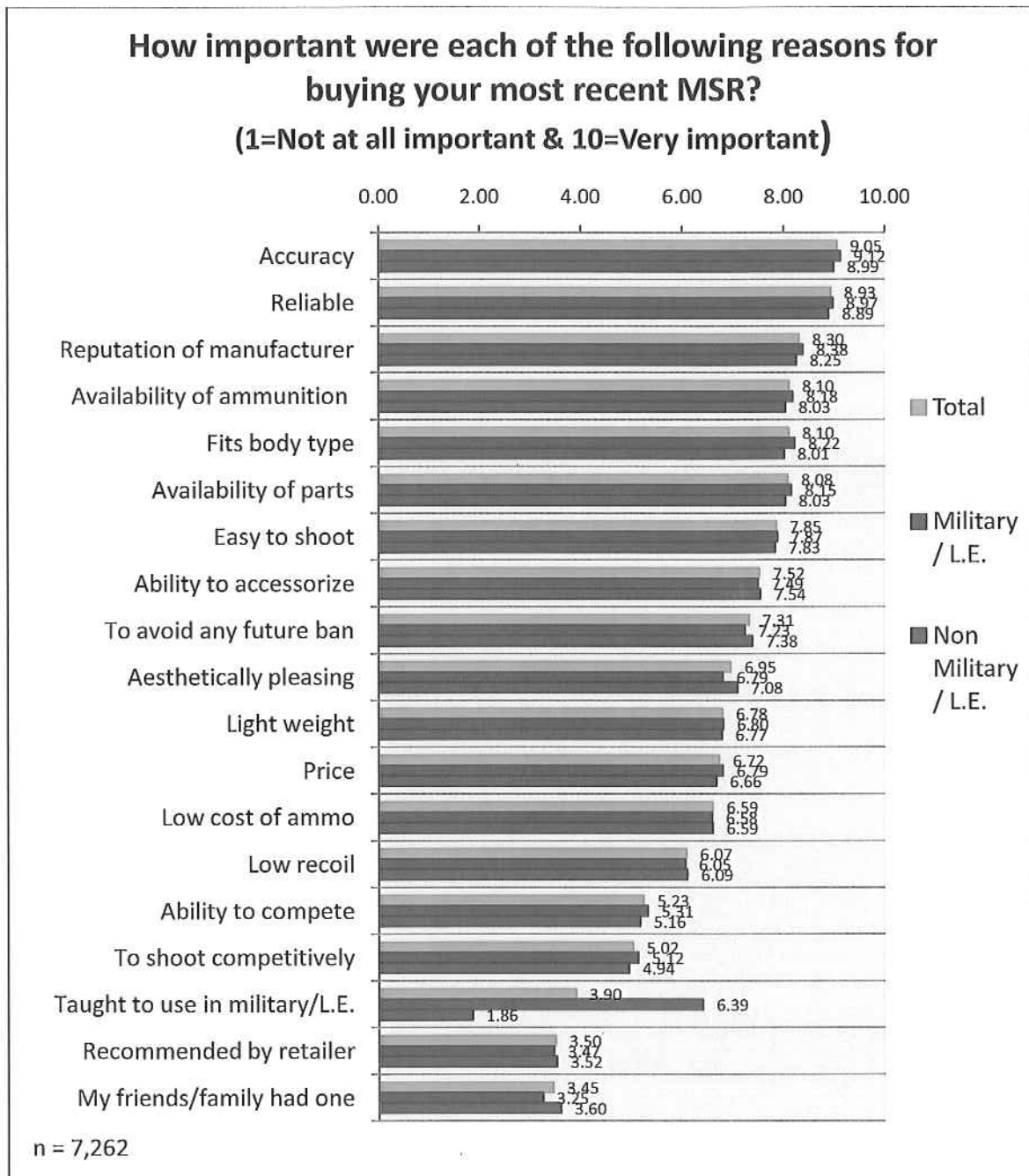
- 52% of MSR owners paid under \$1,000 for their most recent MSR.
- The average amount spent was \$1,083.

5.8 Place of purchase



- Independent retail accounted for 39% of all recent MSR purchases.
- A quarter of all recent MSR purchases were made over the internet.
- Top "other" responses, 1) Individual/Private Sale/Face to Face, 2) Purchased from friend or family, 3) Custom built/parts from a variety of sources.

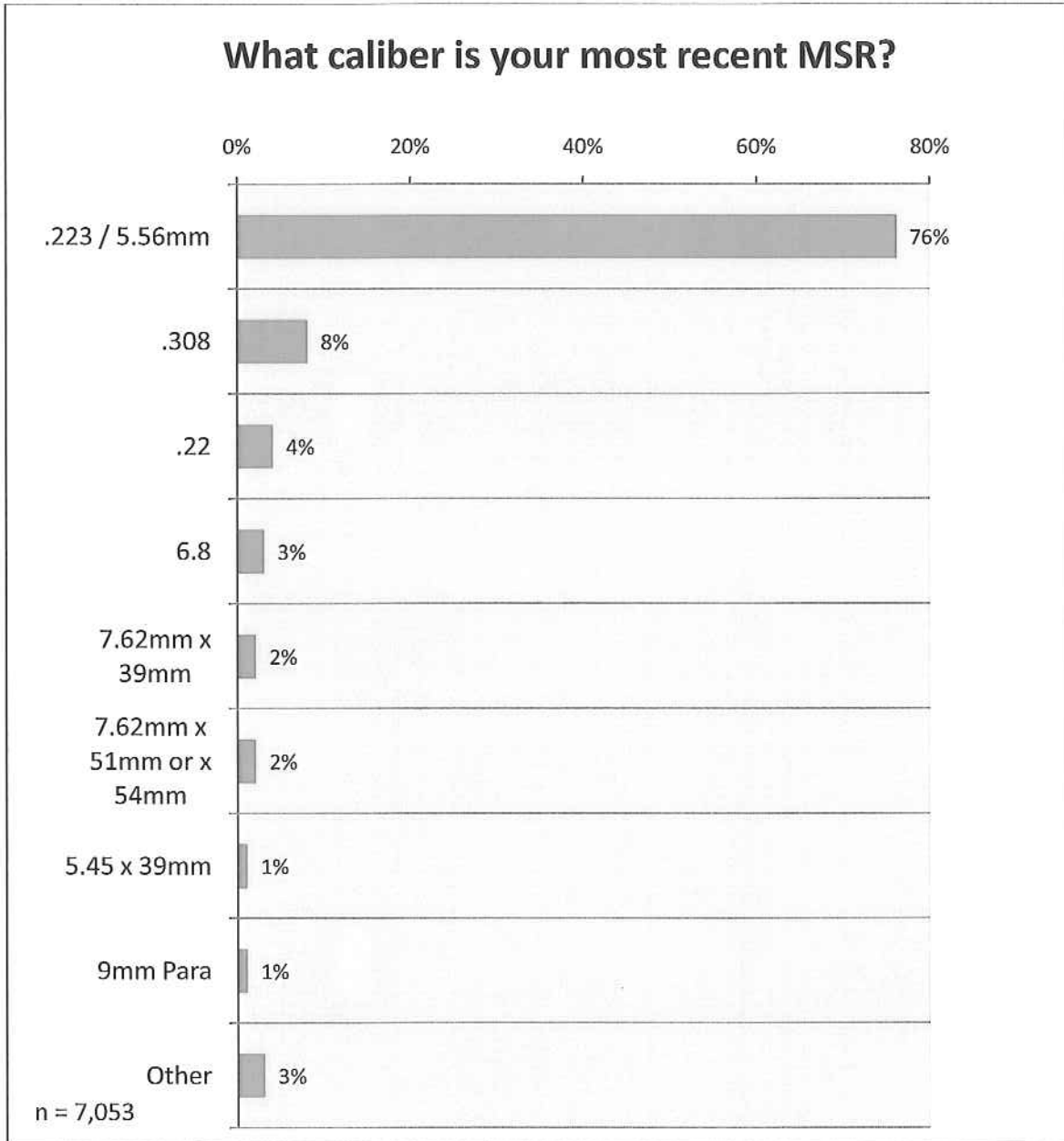
5.9 Reasons for purchase



- The top 5 reasons for buying their most recent MSR were:
 1. Accuracy
 2. Reliability
 3. Reputation of manufacturer
 4. Availability of ammunition
 5. Fits body type/Good ergonomics

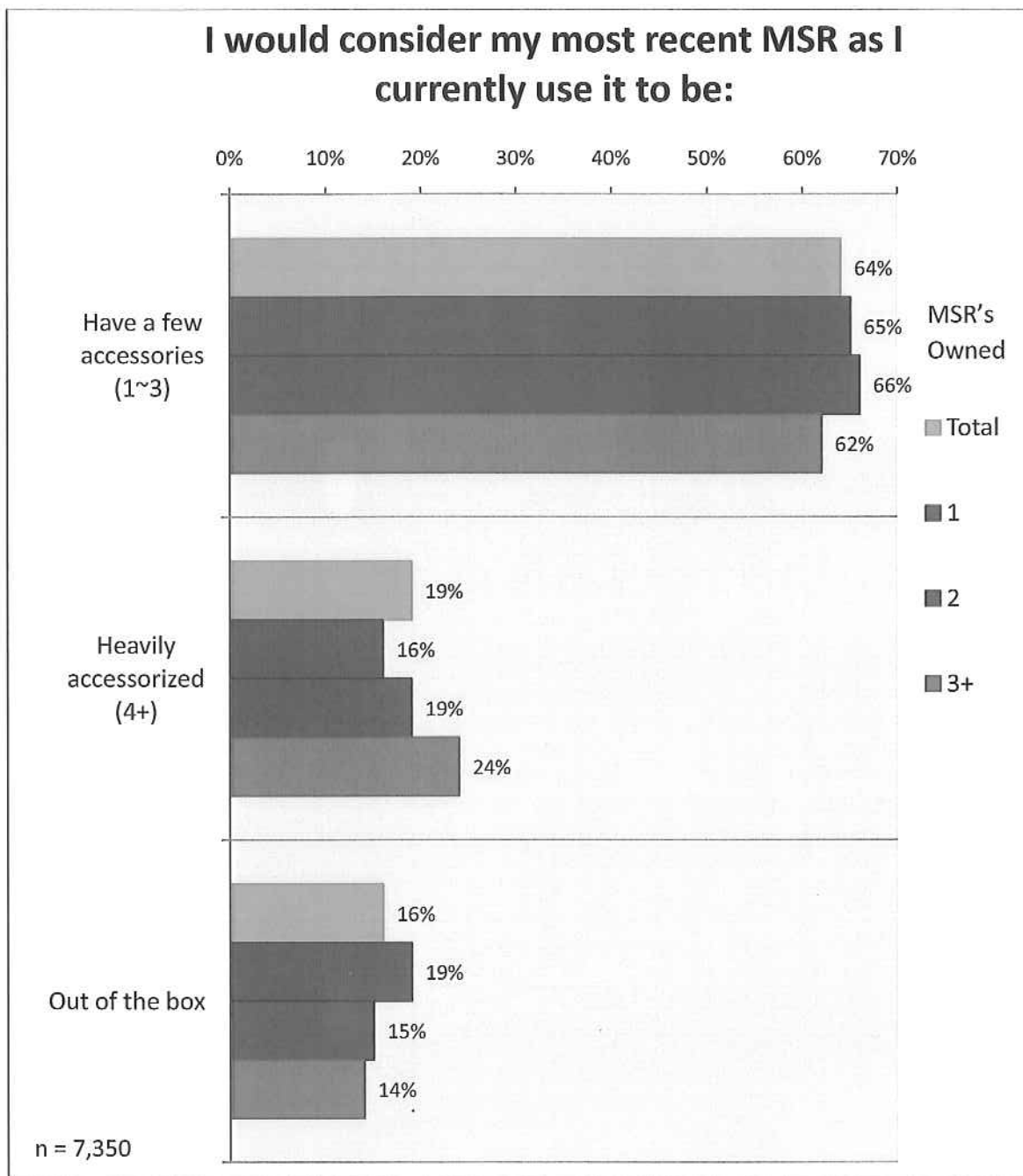
6 MSR AND ACCESSORY SPECIFICATION

6.1 MSR Caliber



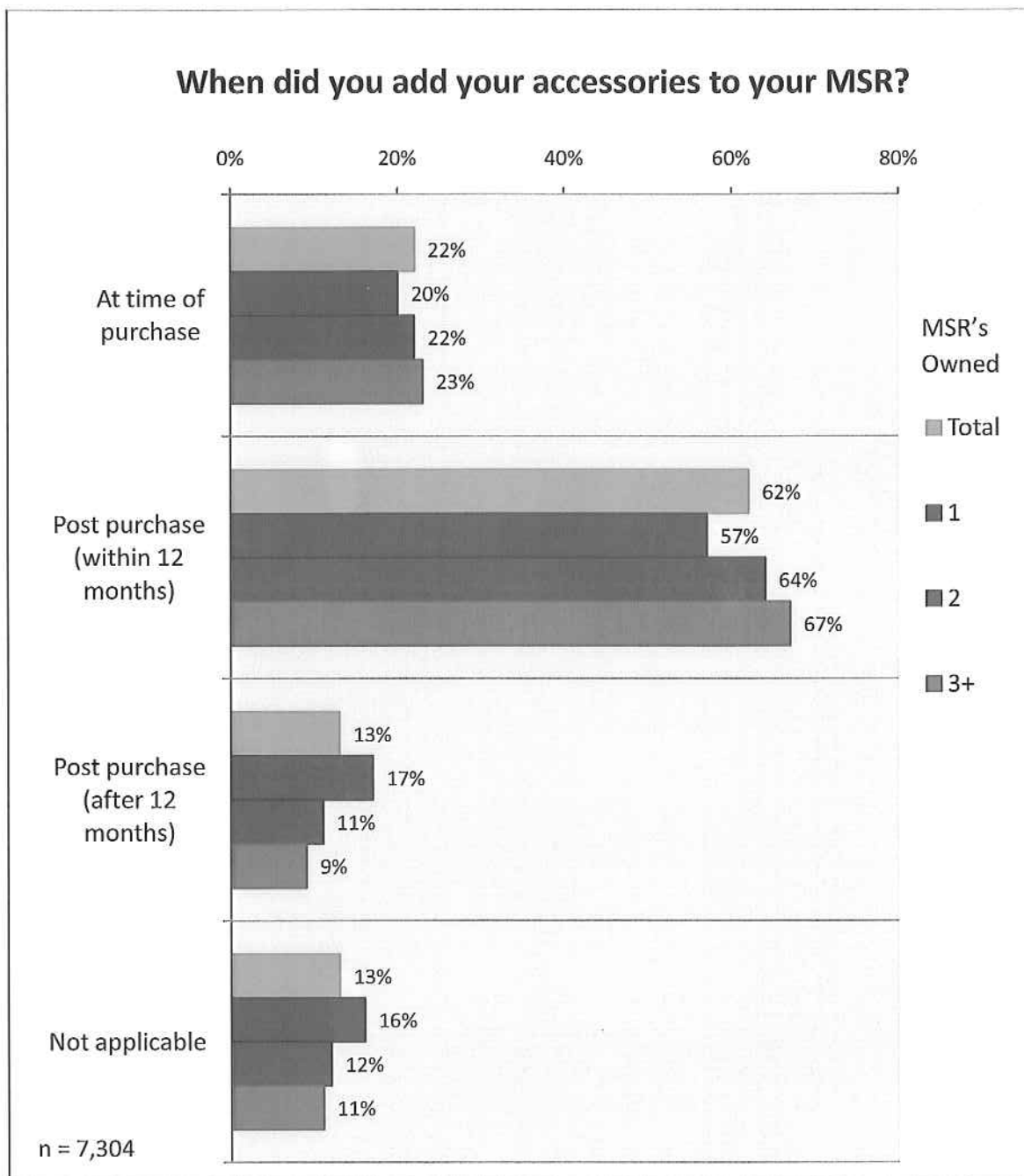
- Three-quarters of recent MSR purchases were chambered in .223 / 5.56mm.

6.2 Level of accessories



- Multiple MSR owners tend to accessorize their MSRs to a greater extent.
- Only 16% of MSRs are operated "out of the box" with no accessories.
- Two-thirds of MSRs have 1-3 accessories fitted.

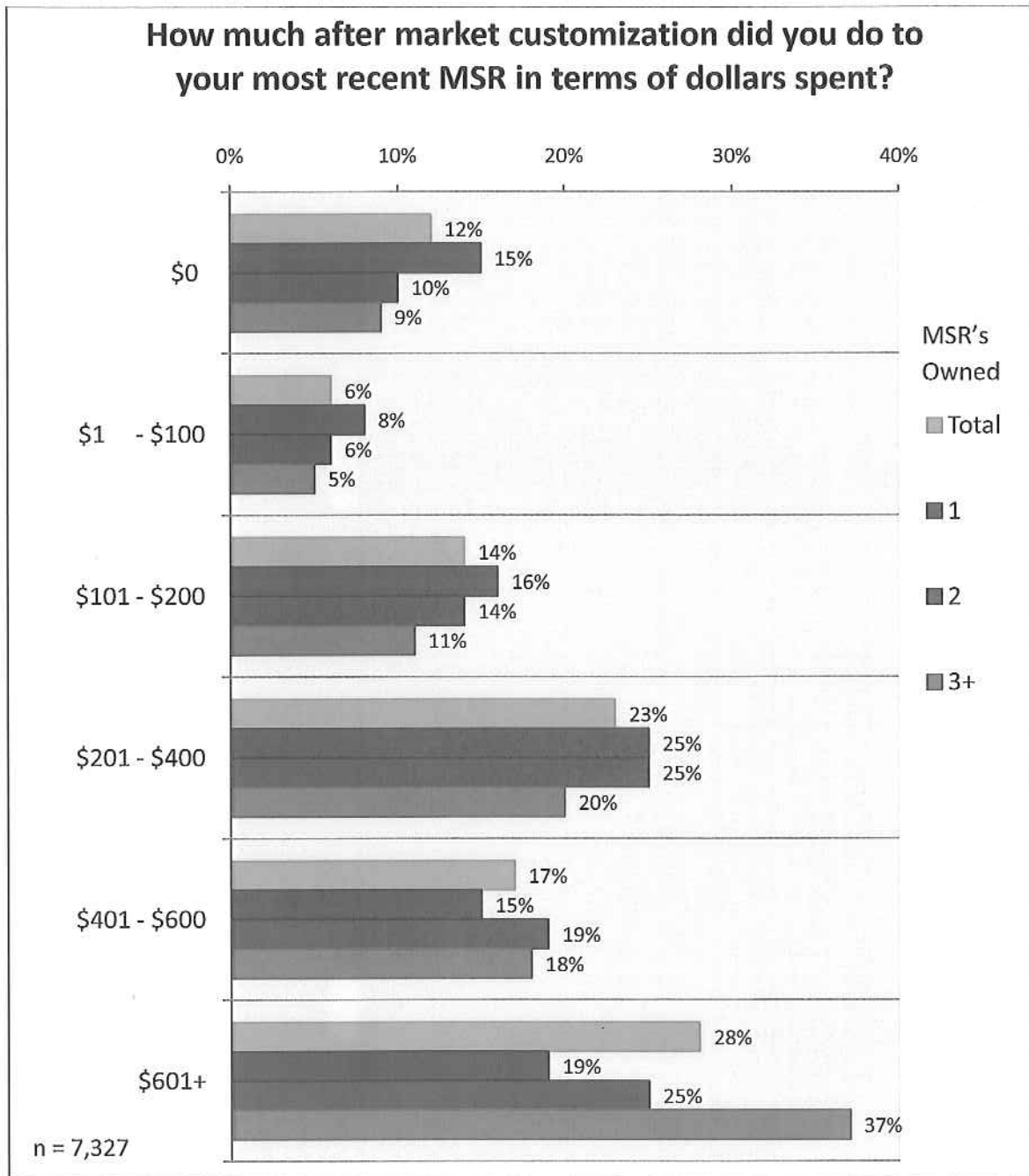
6.3 When accessorized



- Around one-quarter of MSRs are accessorized at the time of purchase.
- Just under two-thirds of MSR owners accessorize within the first 12 months after purchase.

* Multiple selections allowed. Responses do not add up to 100%

6.4 Amount spent on accessories



- Just over a quarter of MSR owners spent \$600 or more on accessories for their most recent MSR purchases. This rises to 37% for those owning 3 or more MSRs.
- \$436 is the average amount spent by MSR owners for after-market customization.

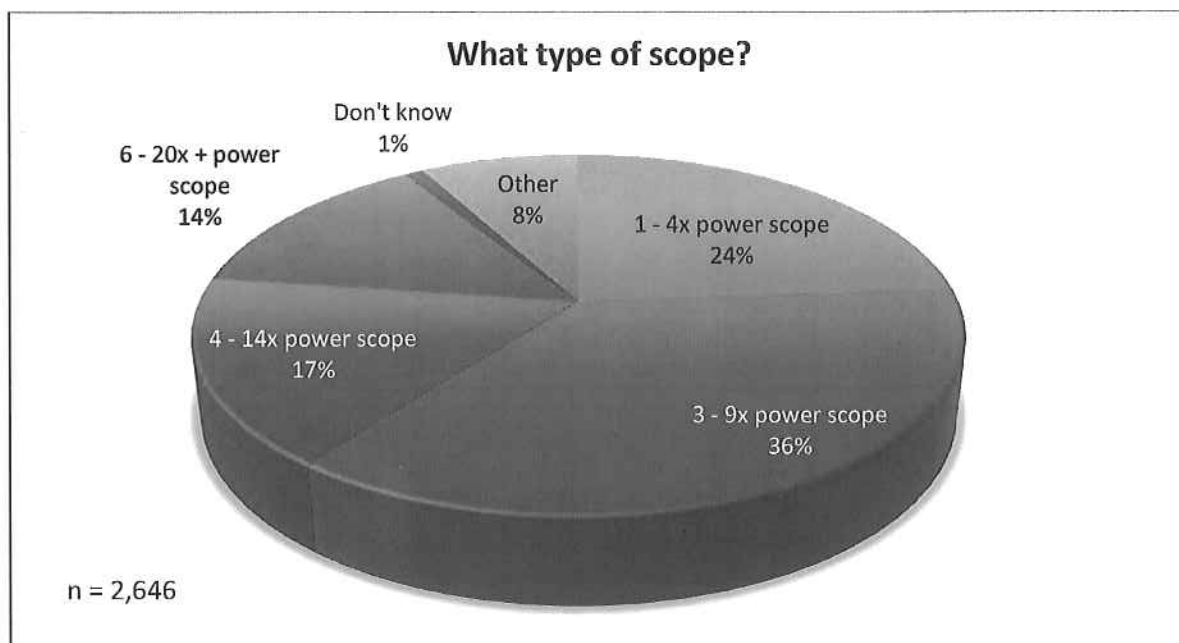
6.5 Optics

The following table shows the optics fitted to the most recent MSR purchases:

	Primary	Secondary
Iron sights	27%	41%
Scope	42%	7%
Red dot	28%	9%
Laser designator	2%	7%
Other	1%	1%
NONE	0%	35%
	100%	100%

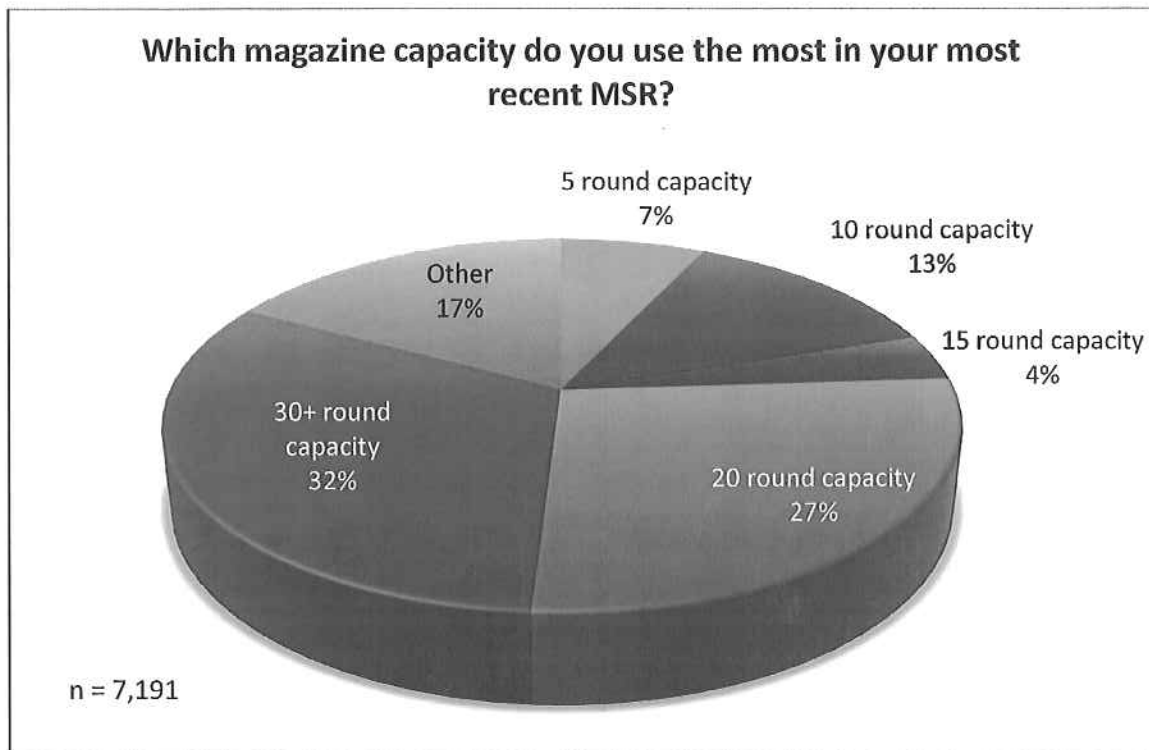
n = 7,302

6.6 Scope



- 3-9x power is the most popular scope with 36%
- A quarter of MSRs have 1-4x power scopes
- Top "other" response 2-7x power scope

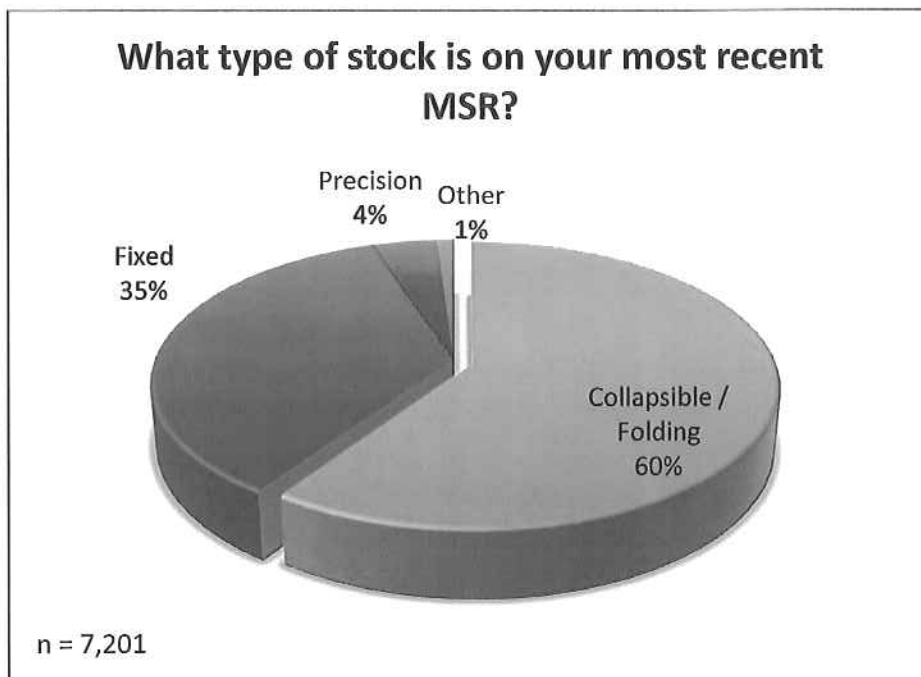
6.7 Magazine capacity



- A third of all MSR owners use 30+ round capacity magazines in their most recent MSR purchase.
- The next most popular magazine capacity is 20 round.
- Top "other" responses: 25 round & multiple magazines owned

6.8 Stock type

- 60% of MSR owners use a collapsible/folding stock



6.9 Upper receiver

- Nearly 7 out of 10 of the most recent MSRs purchased had flat top upper receivers

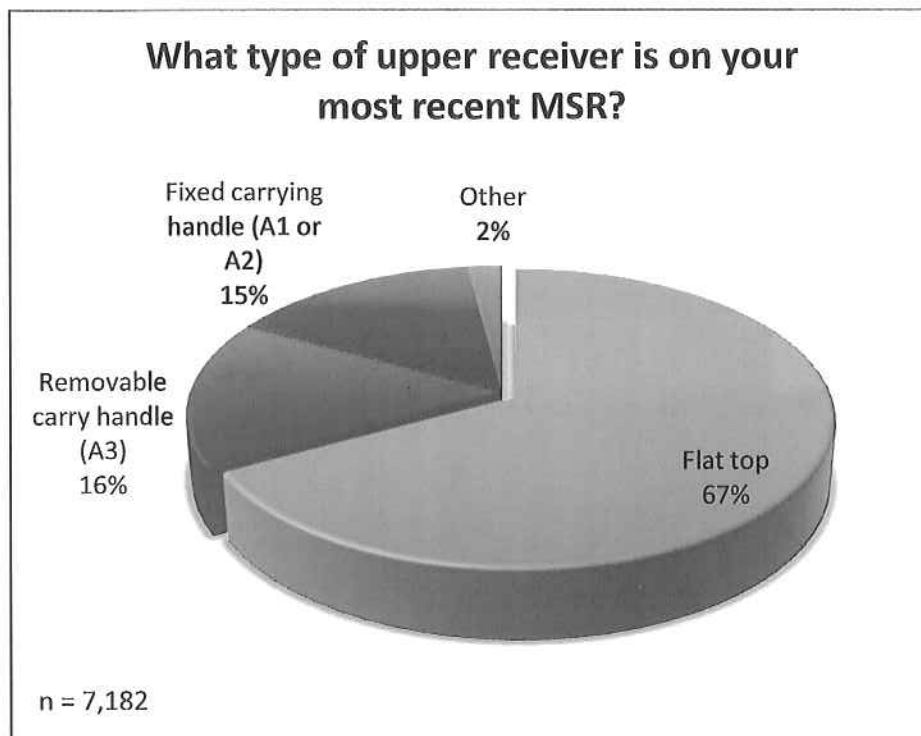
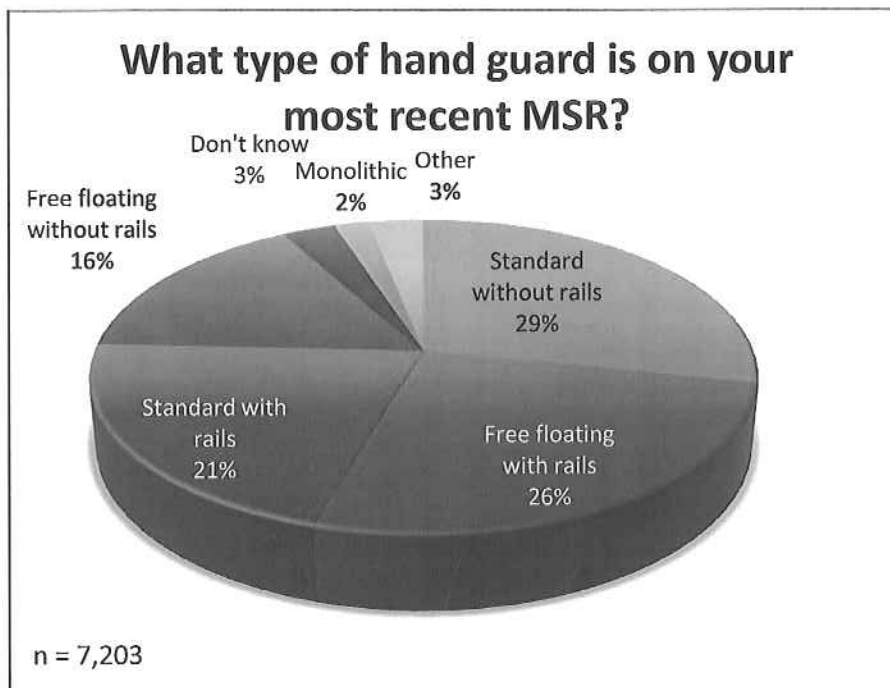


EXHIBIT B
(2 of 3)

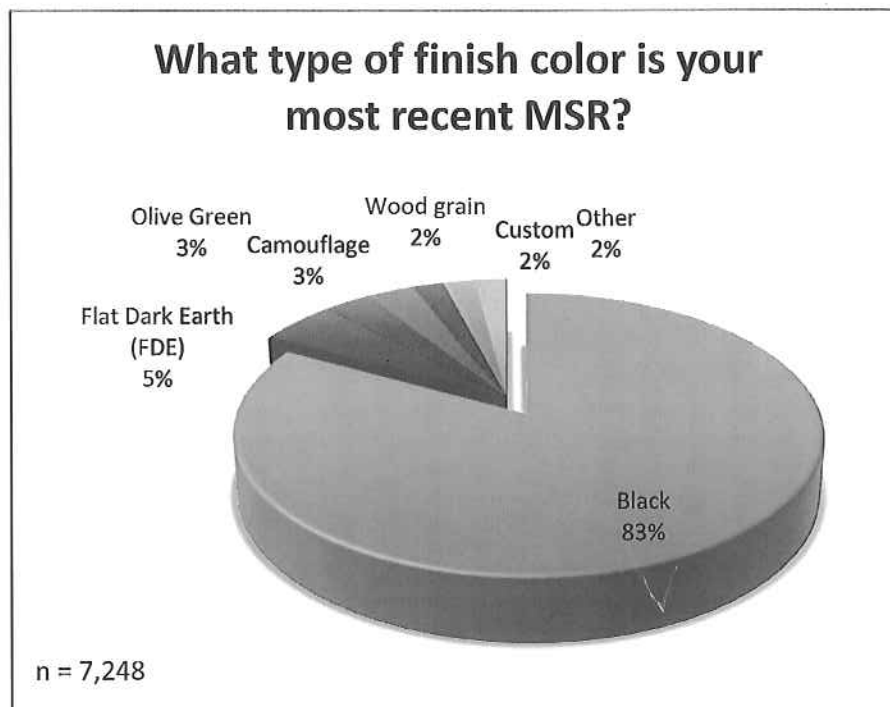
6.10 Hand guard

- MSR owners are evenly split on having rails or not having rails on their MSR



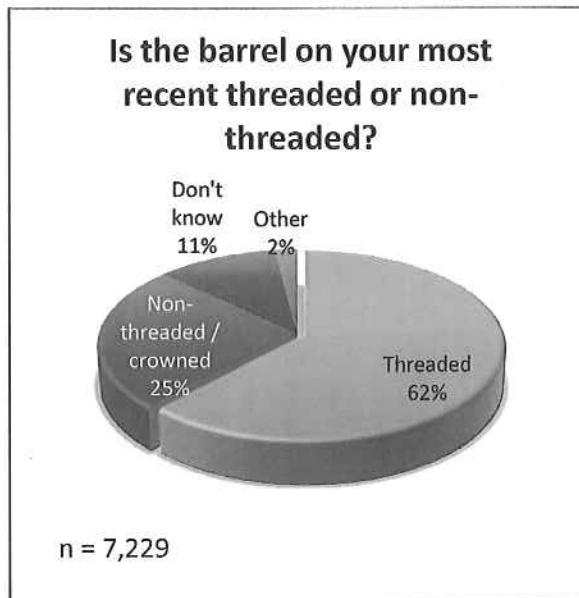
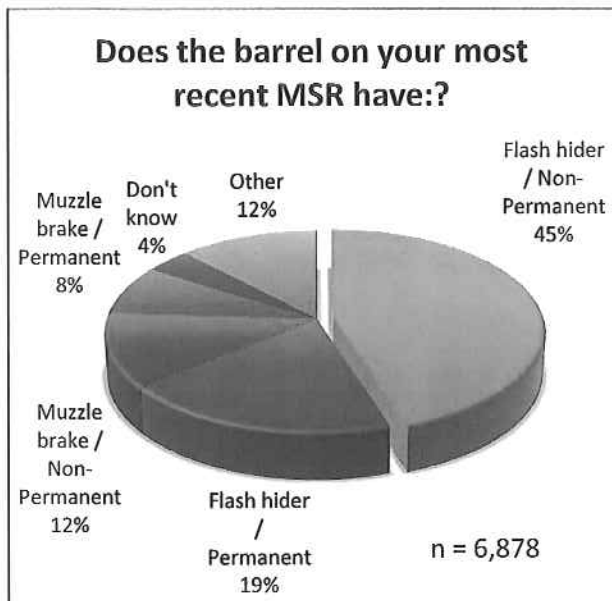
6.11 Finish color

- Black is by far the most popular finish color with 83% of recent MSRs.

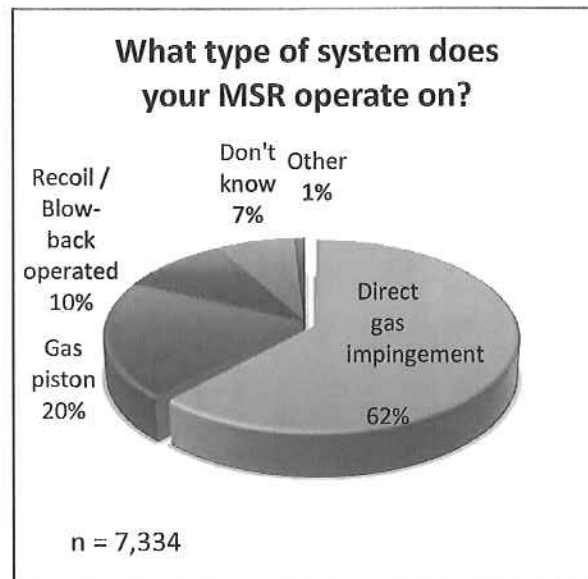
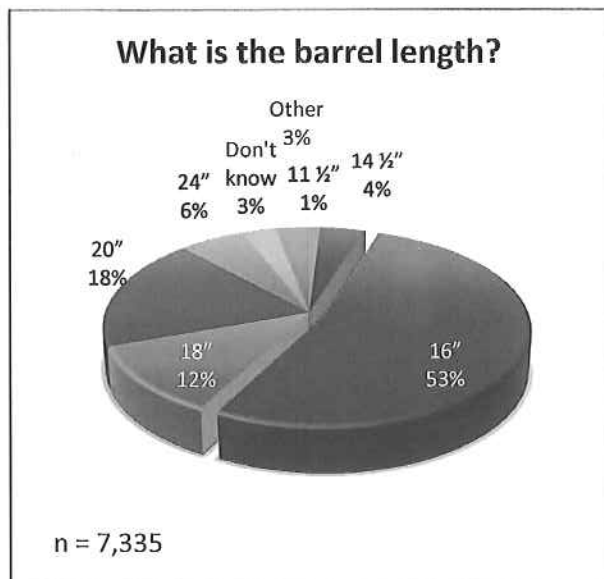


6.12 Barrel and Operation

- 62% of most recent MSR's had a threaded barrel, 64% had a flash hider, 54% had a 16" barrel and 62% operate on a direct gas impingement.

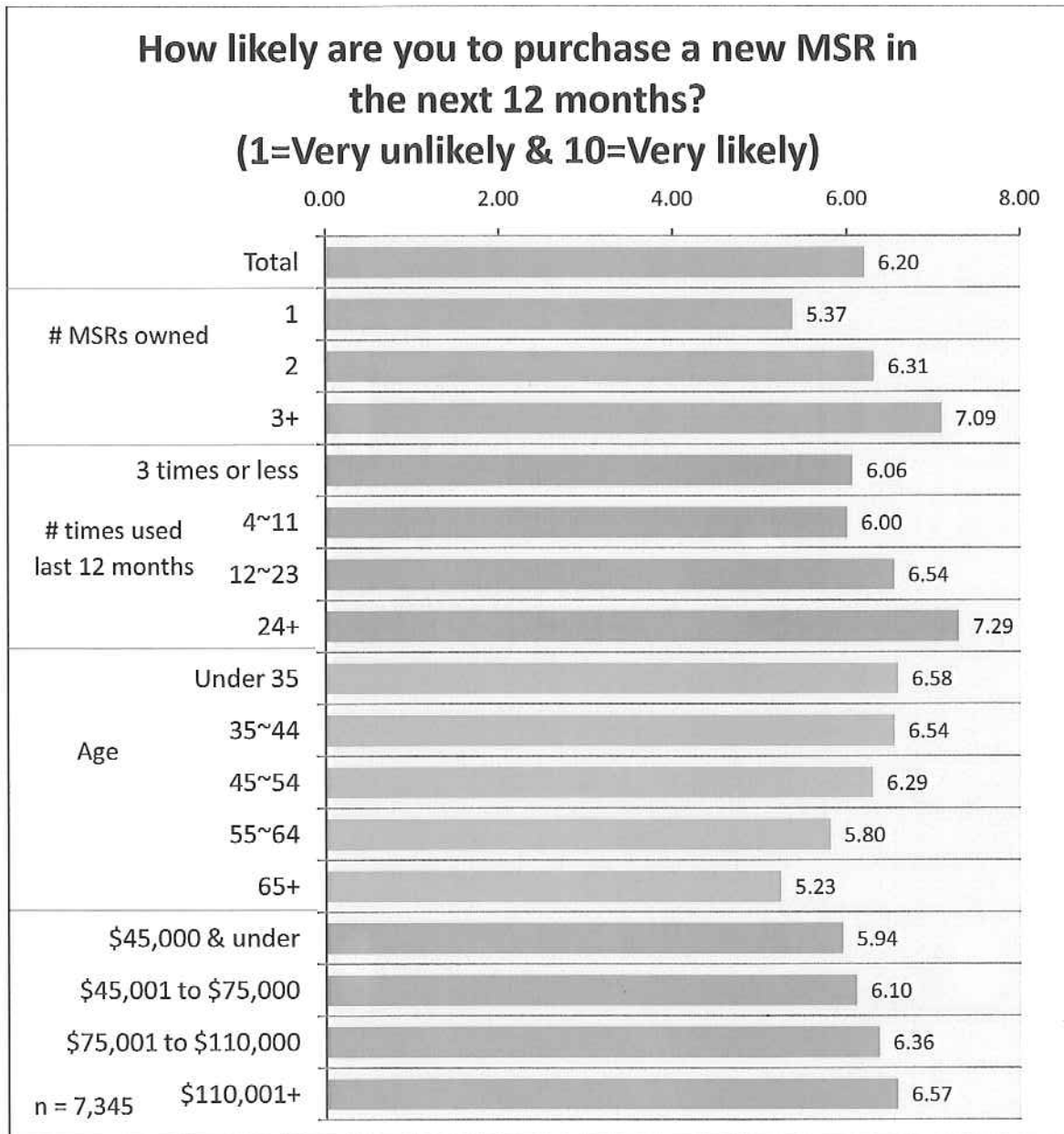


- Top "other" responses include:
 1) neither flash hider or muzzle break



7 FUTURE PURCHASE INTENTIONS

7.1 Likelihood of buying a new MSR in next 12 months



The most likely sub-groups to buy a new MSR in the next 12 months are:

- Multiple MSR owners
- Frequent users
- The more affluent groups
- The under 35s.

7.2 Currently own and likely to buy

	Currently Own (% of respondents)	Plan to buy in next 12 months (% of respondents)
Rifle sling	81%	12%
Soft carrying case	70%	10%
Mounted rifle scope	68%	16%
Hard carrying case	61%	10%
Backup iron sights	59%	10%
Tactical flashlight	58%	16%
Spotting scope	52%	18%
Bipod	51%	17%
Railed handguard	51%	15%
Vertical foregrip	40%	15%
Stock upgrade	39%	15%
Tactical apparel	37%	11%
Trigger upgrade	33%	24%
Range finder	32%	23%
Laser optic	26%	17%
Night vision	10%	18%
Laser designator	10%	10%
Sound suppressor	6%	19%

n = 6,188 – 7,054

Top 5 most owned:

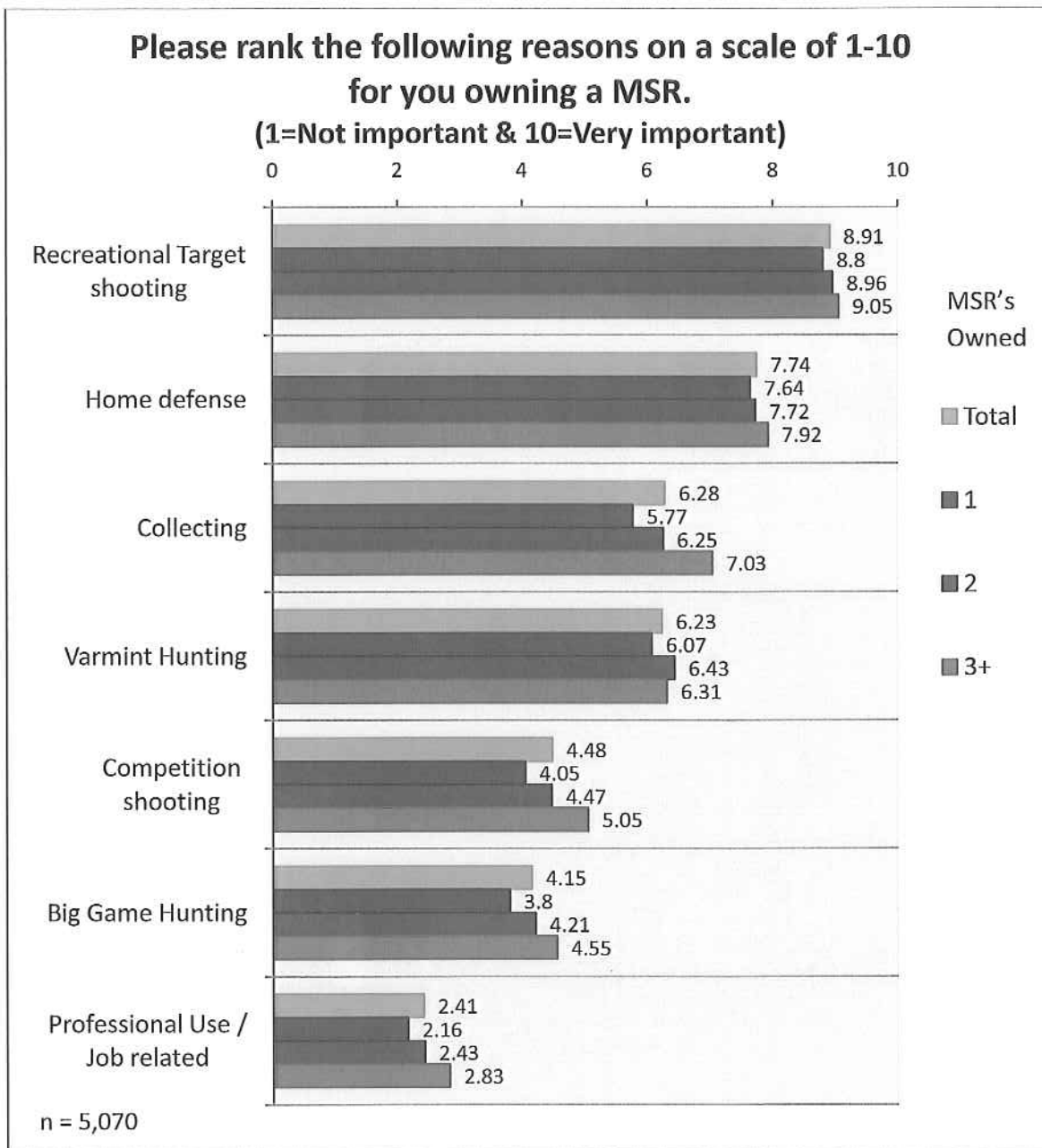
1. Rifle sling
2. Soft carrying case
3. Mounted rifle scope
4. Hard carrying case
5. Backup iron sights

Top 5 most likely to buy in next 12 months:

1. Trigger upgrade
2. Range finder
3. Sound suppressor
4. Spotting scope
5. Night vision

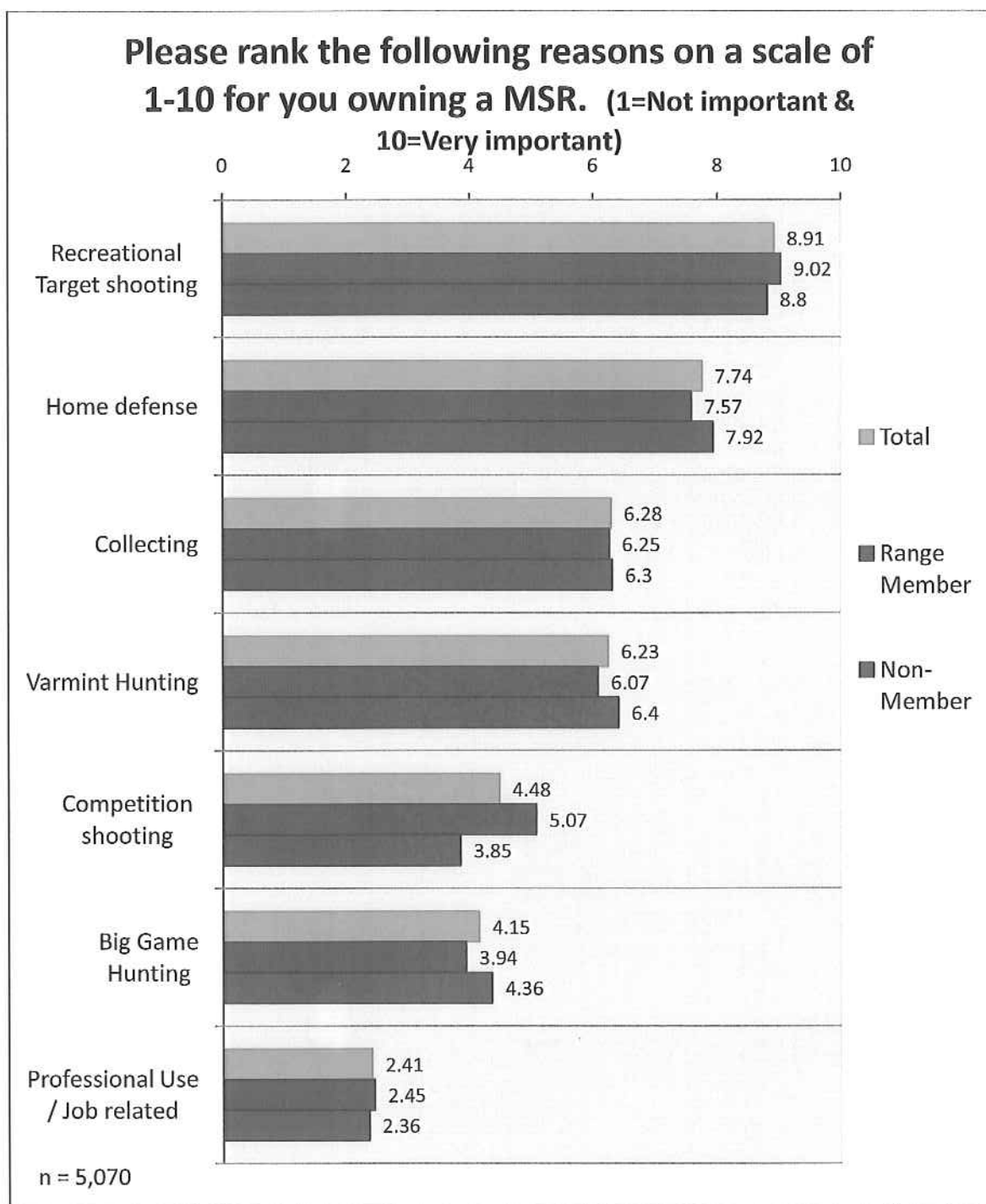
8 MSR USAGE

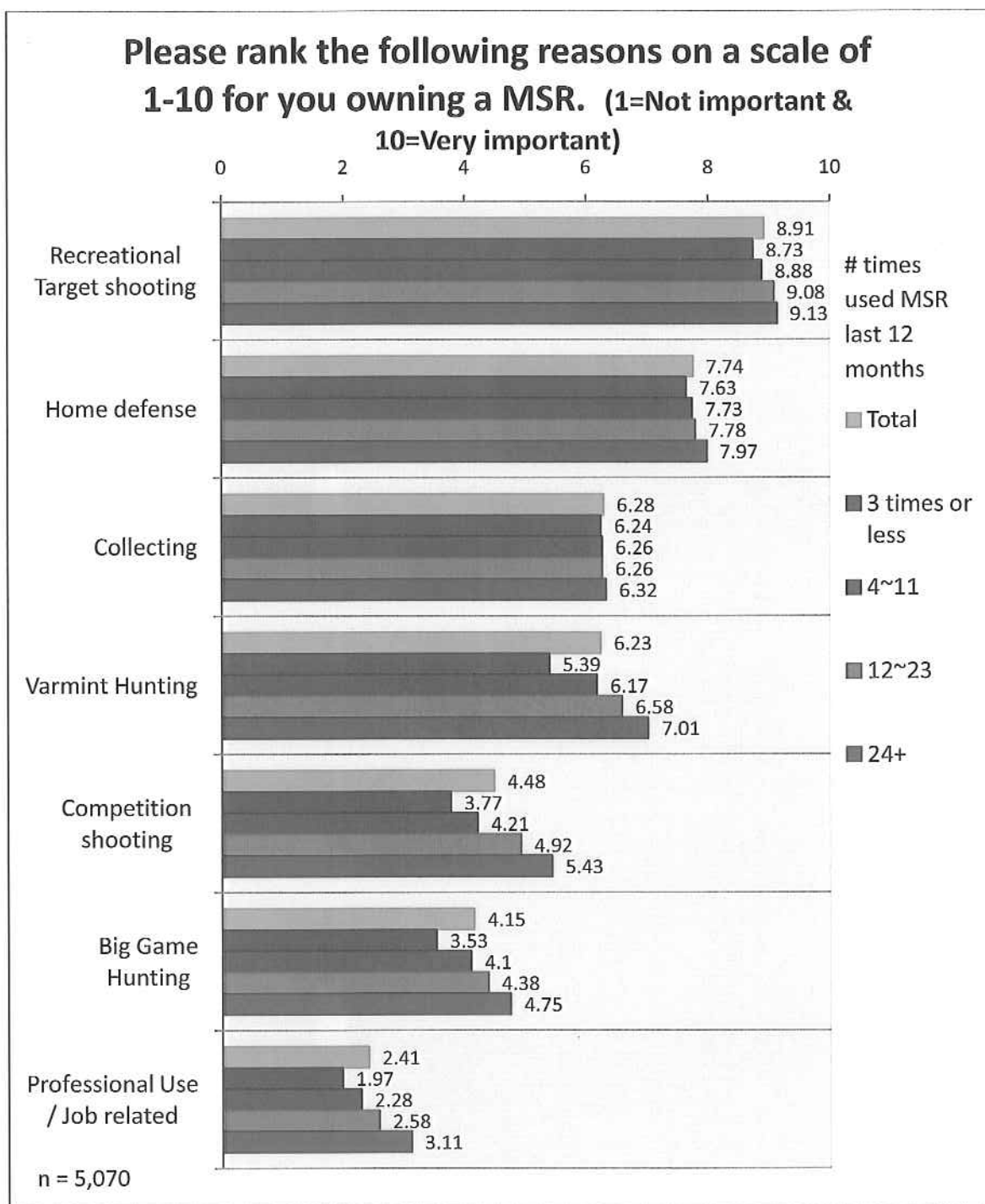
8.1 Reasons for owning MSR



Multiple MSR owners give higher importance ratings for:

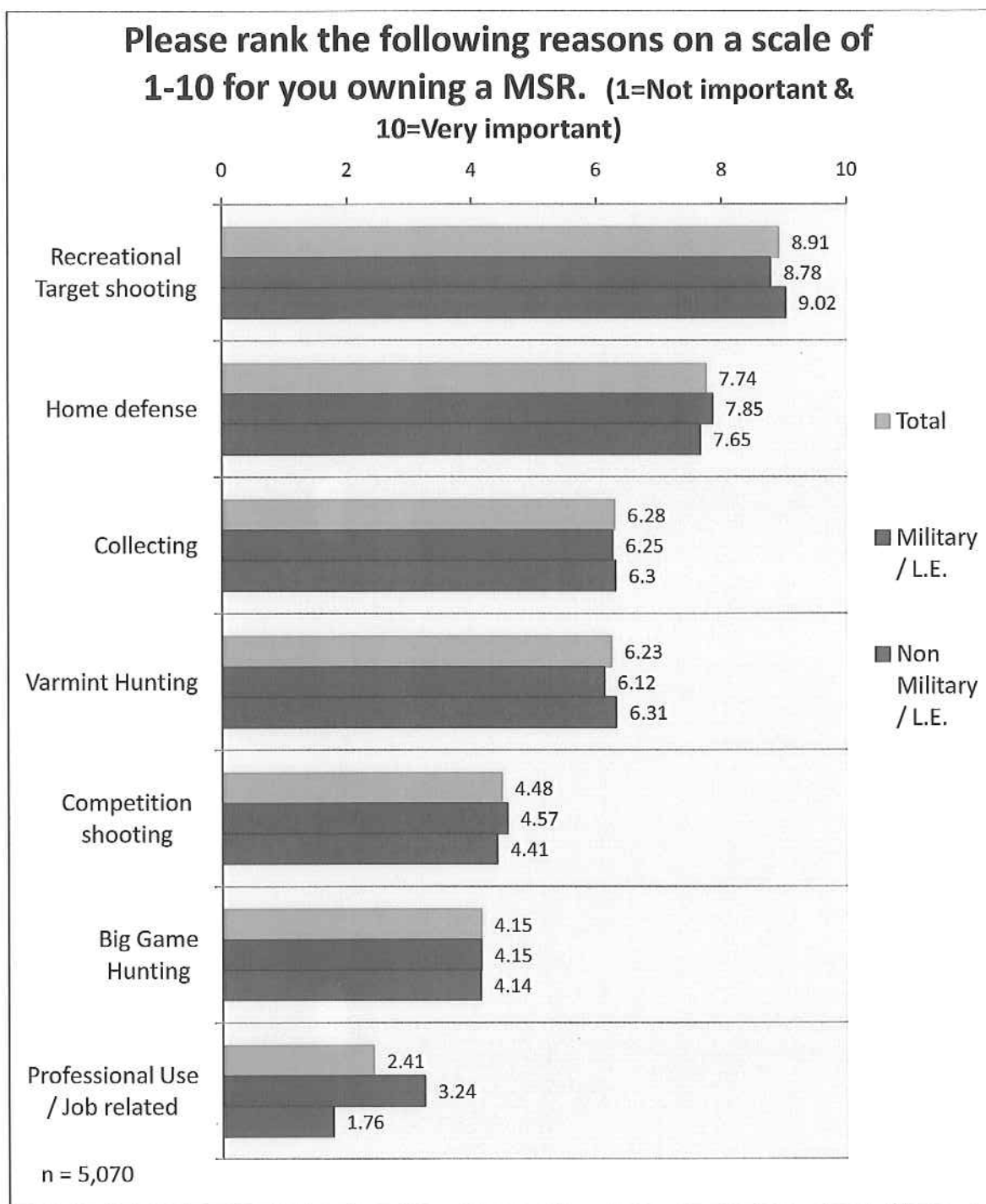
- Collecting
- Competition shooting
- Big game hunting
- Professional use.



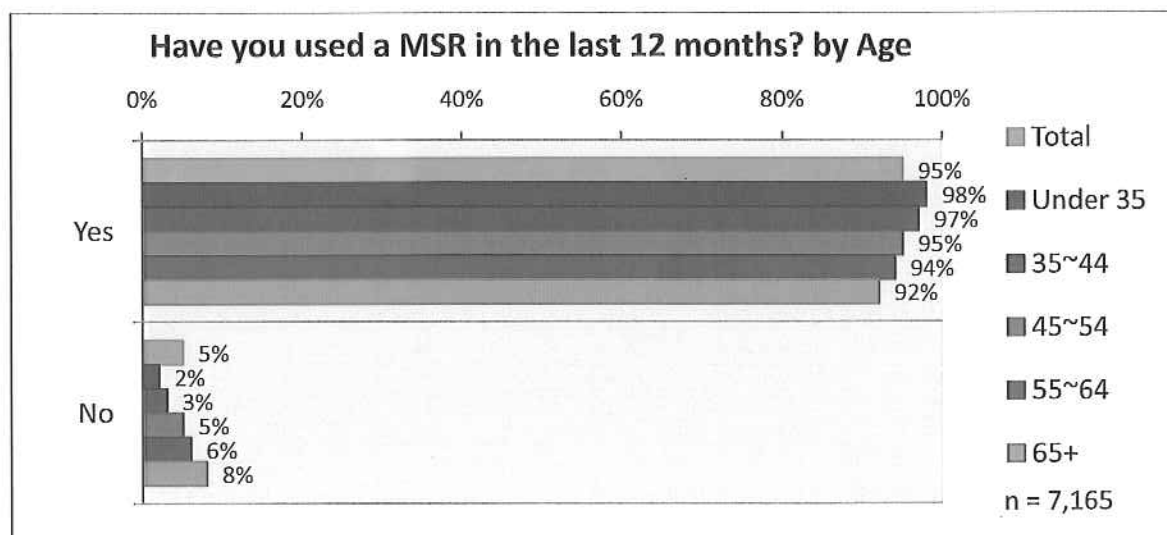
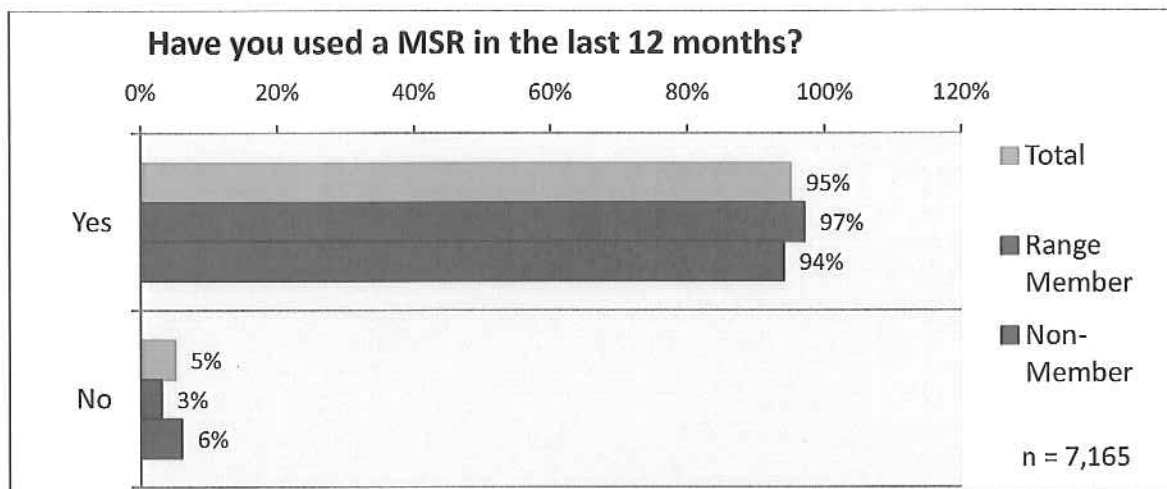
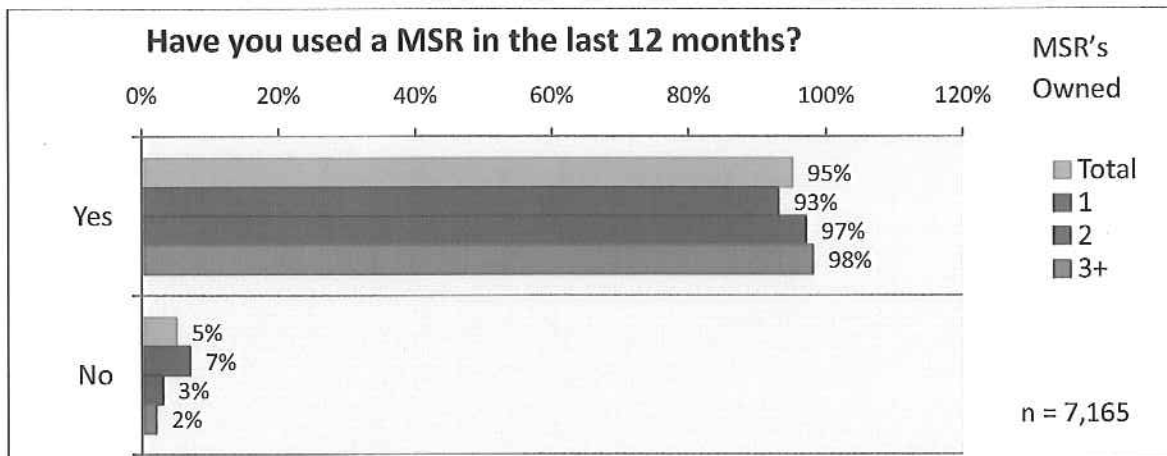


Avid users (24+ times used per year) give higher importance ratings for:

- Varmint and big game hunting
- Competition shooting
- Professional use

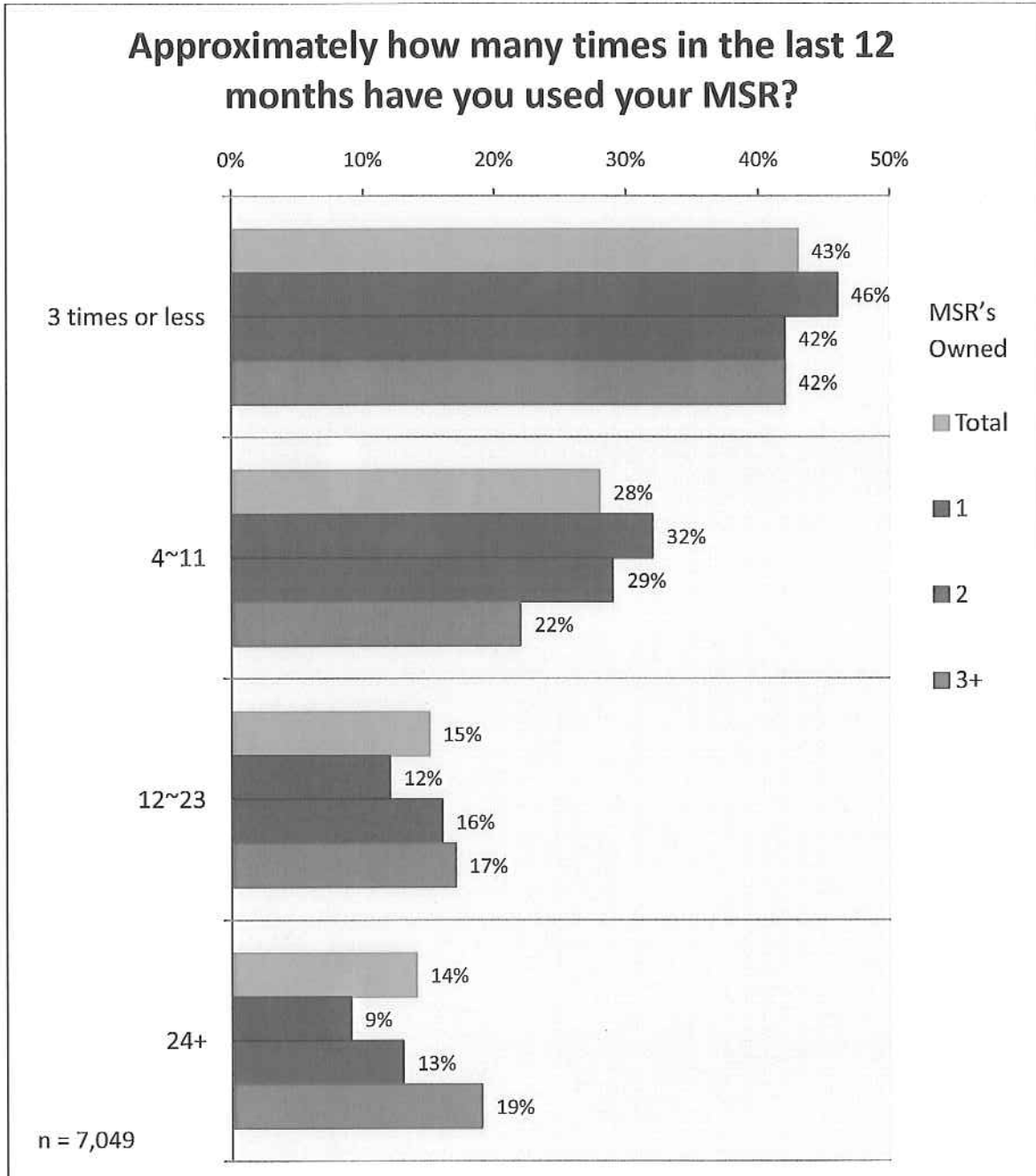


8.2 Usage

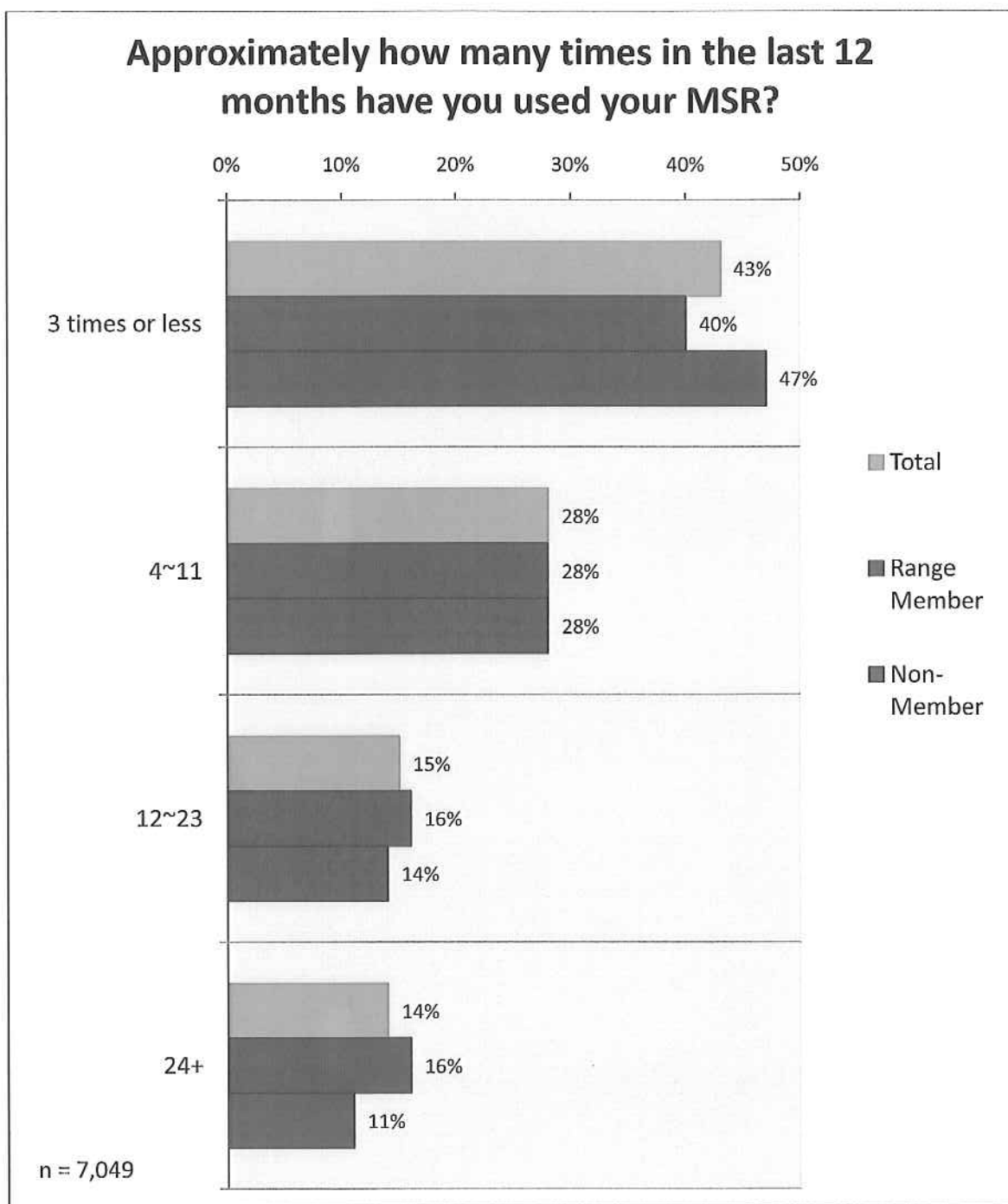


Usage patterns are very similar across most sub-groups. Younger, range members and multiple MSR owners tend to use their MSRs more.

8.3 Frequency of usage



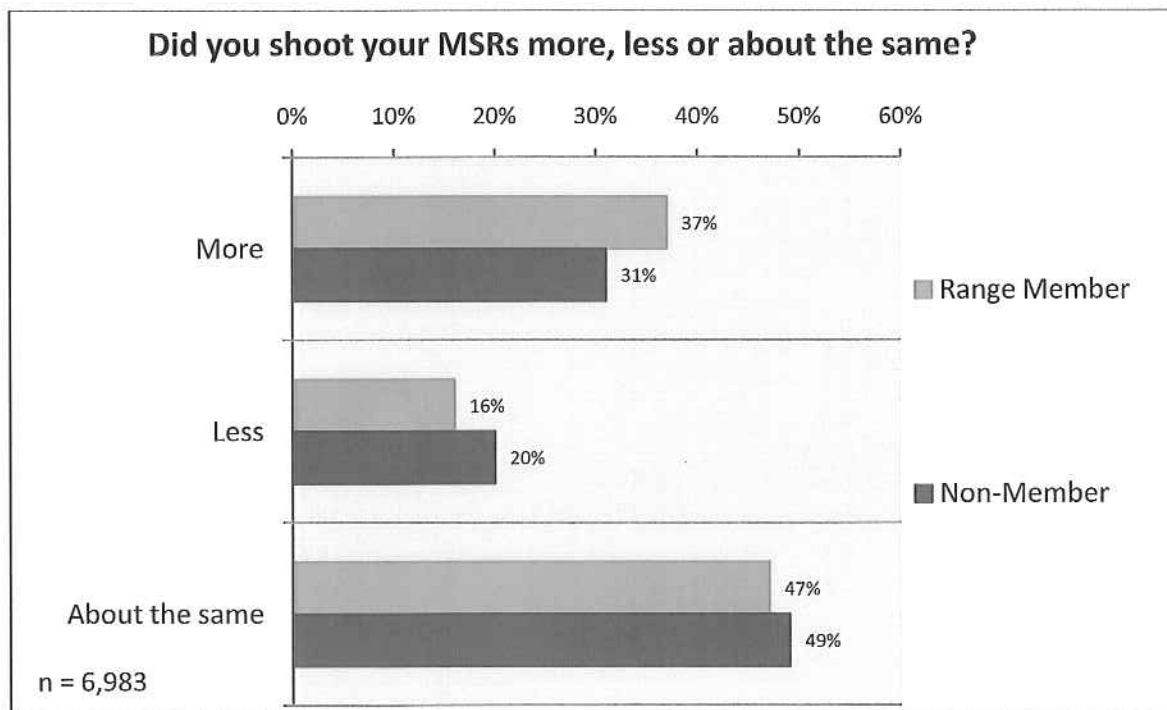
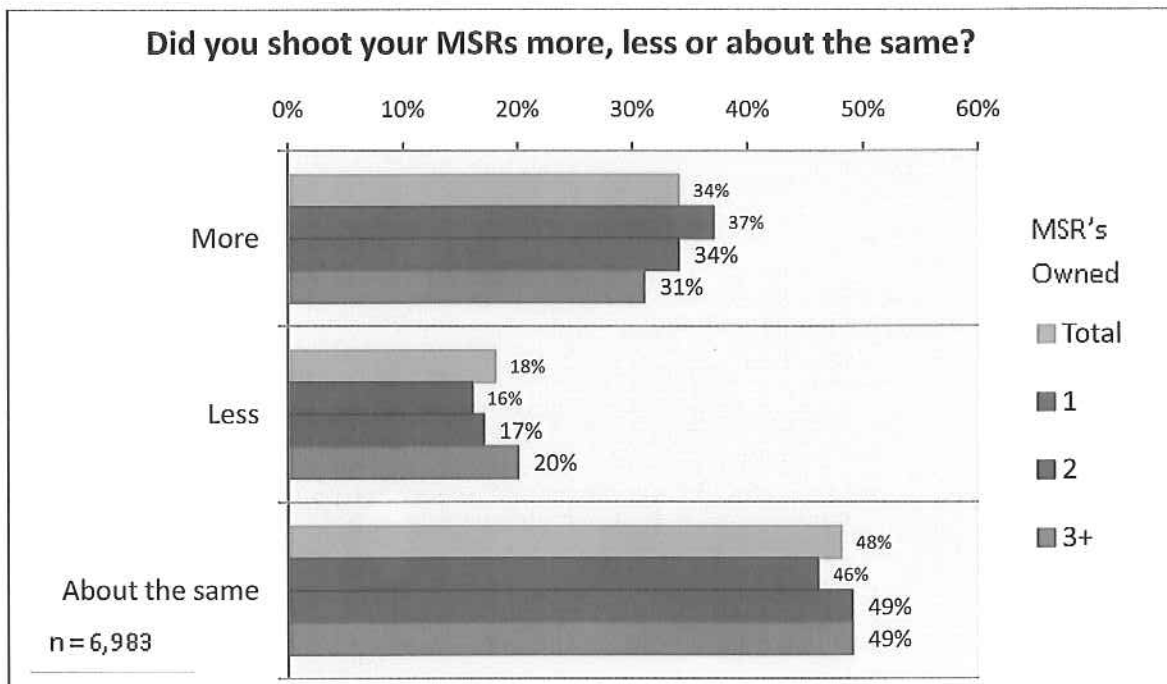
- The average times used among all MSR users was 16.7 times in the last 12 months.



Usage frequency is higher among:

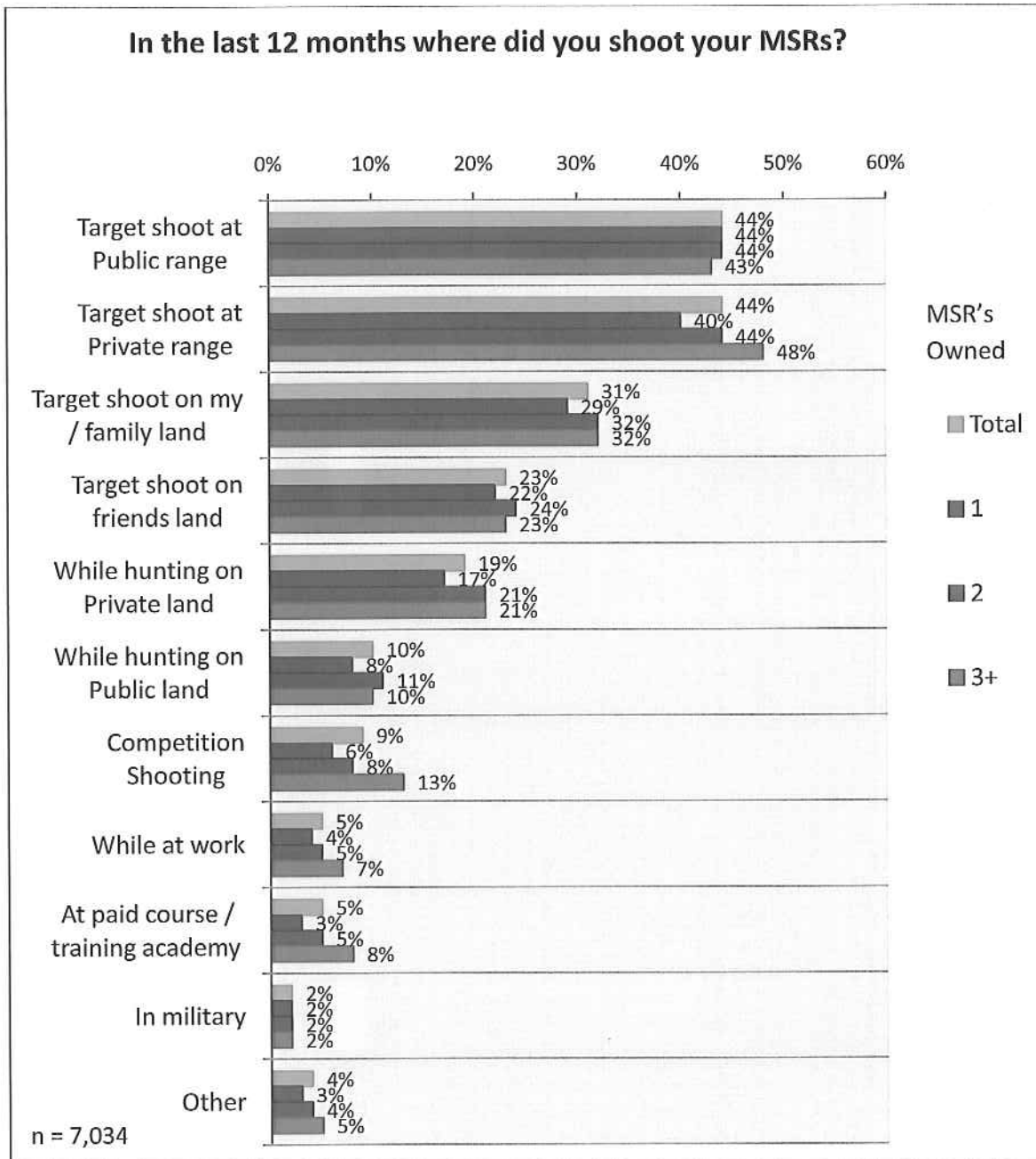
- Range members
- Multiple MSR owners.

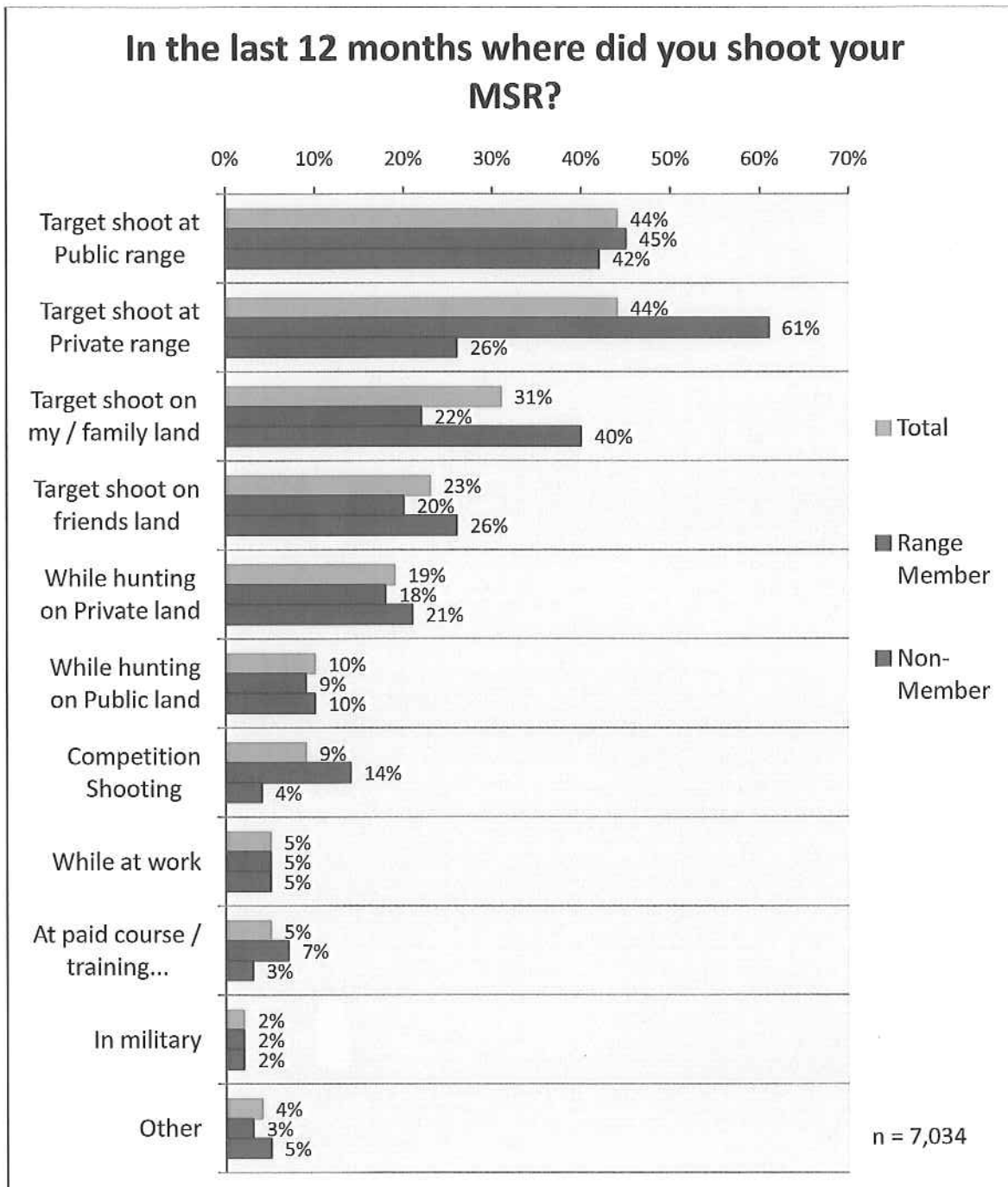
8.4 Year/Year MSR Usage

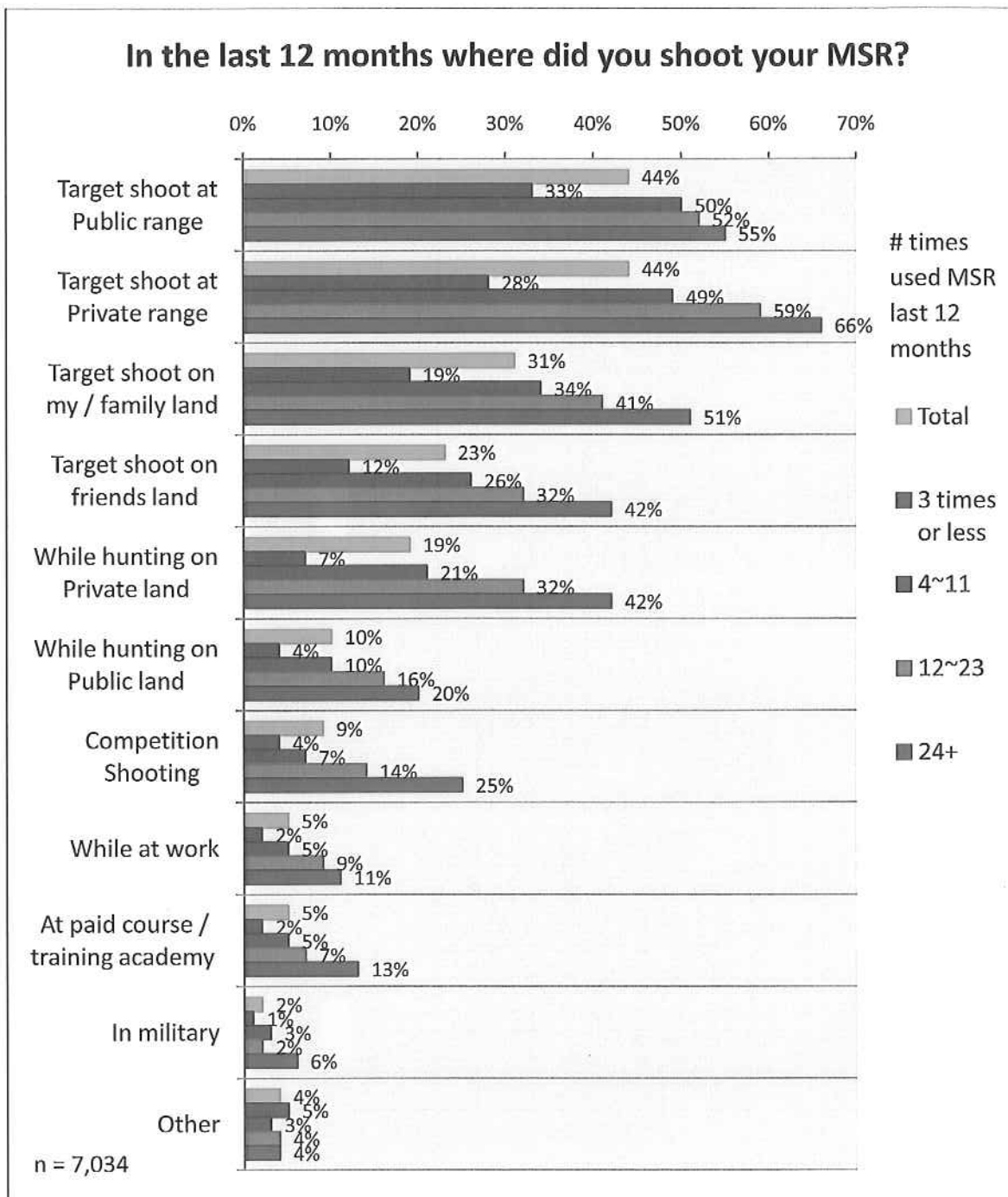


Range members were more likely to have increased their usage over the last 12 months compared to the previous year.

8.5 Where used



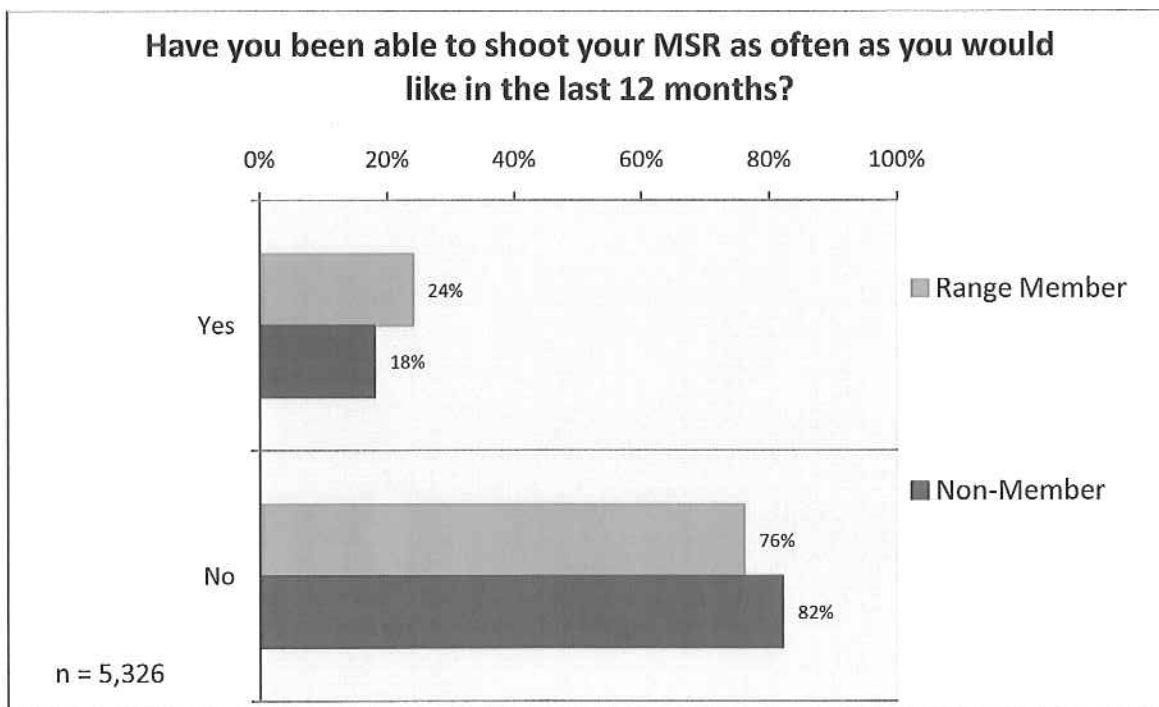




Multiple MSR owners are relatively more likely to shoot:

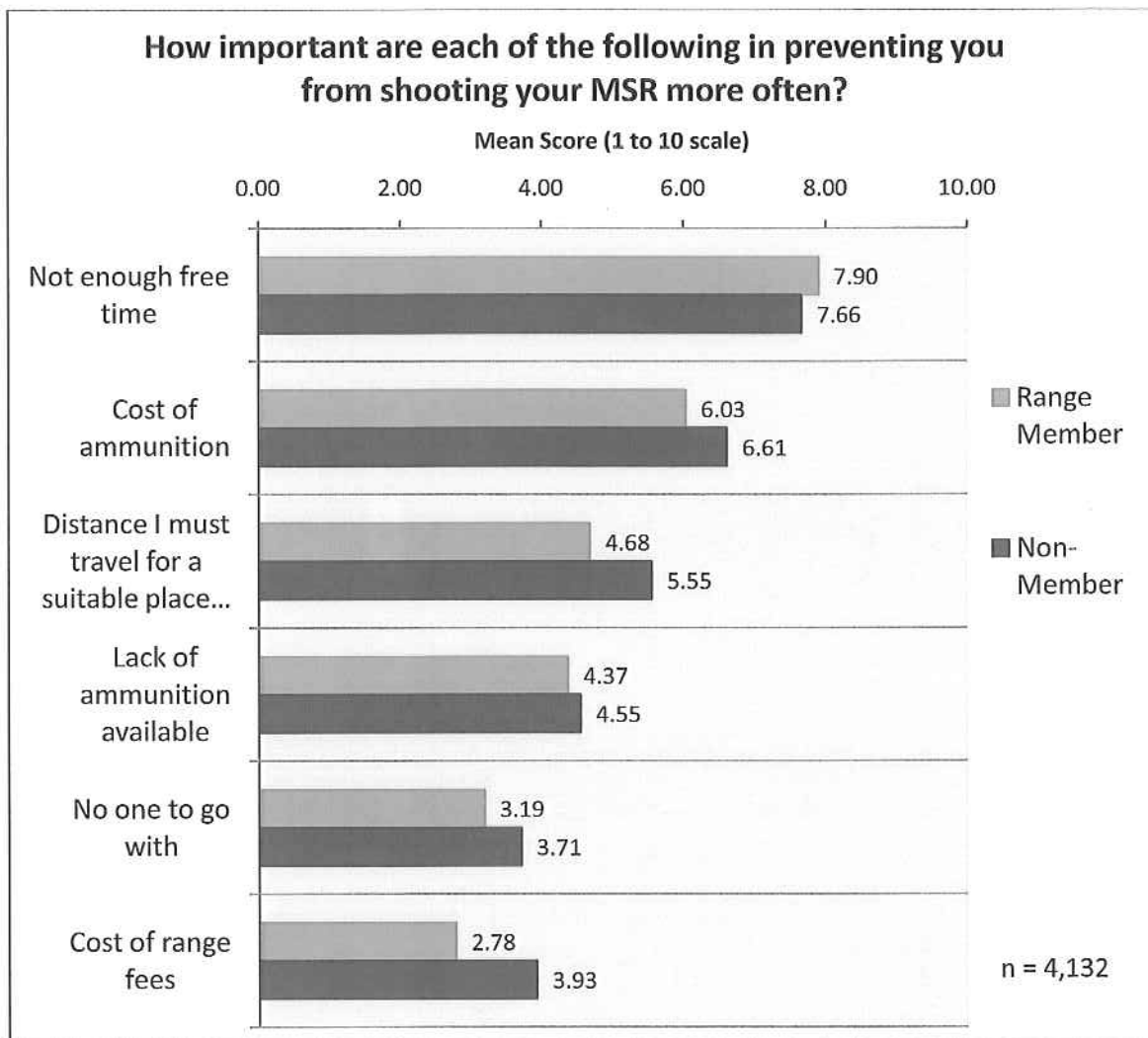
- At a private range
- Competition
- As part of work
- Avid users (shooting 24+ times a year) are more likely to shoot: at all venues.

8.6 Able to shoot MSR as often as would like



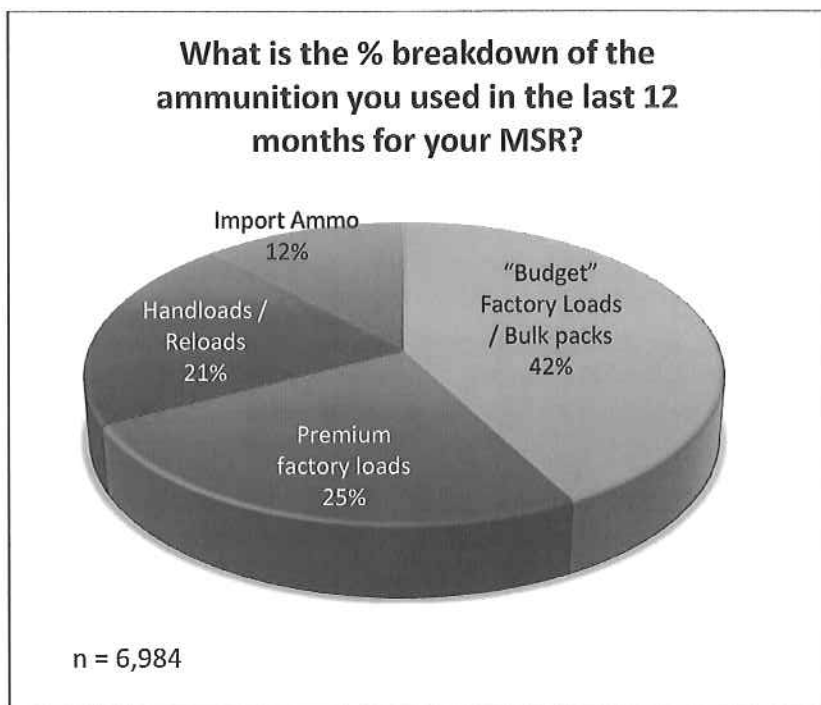
- 82% of non-range members were not able to shoot their MSRs as often as they would like in the last 12 months. Although this drops to 76% for range members there is still the vast majority of MSR owners that don't get to shoot as often as they would like.

8.7 Barriers to shooting MSR more frequently



- Lack of time and the cost of ammunition are the two most important reasons for not being able to shoot as often as they would like.
- Non-range users are more likely to say cost of range fees has an impact but is still placed in the bottom two in terms of importance.

8.9 Ammo used



- Budget factory loads are used 42% of the time with premium loads accounting for 25%.

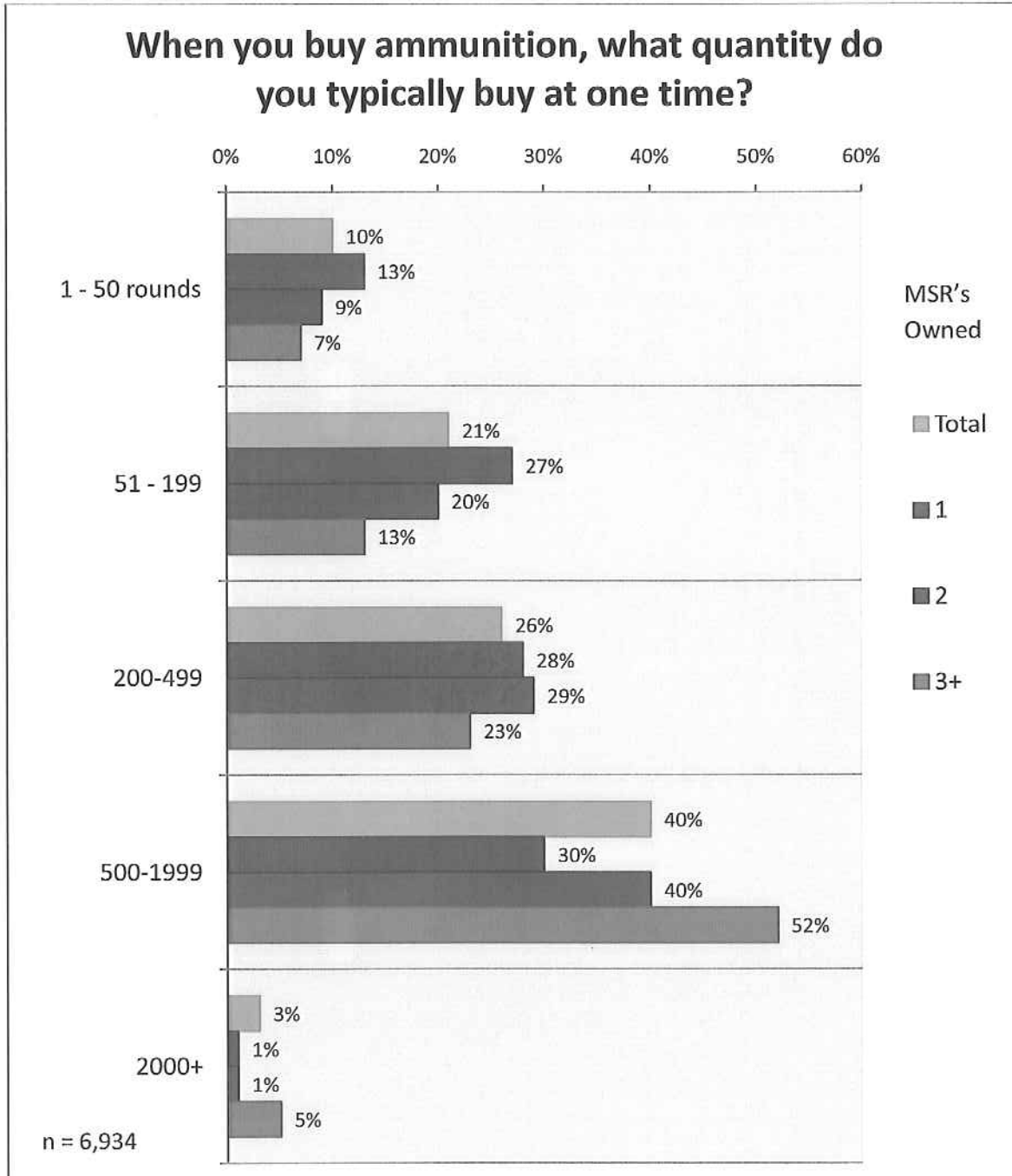
8.10 Number of rounds fired in last 12 months and forecast

	Last 12 months	2011 Projection
None	6%	0%
1-50	2%	2%
51 - 100	5%	4%
101 - 200	9%	8%
201 - 400	16%	14%
401 - 600	16%	17%
601 - 800	7%	9%
801 - 1,000	12%	15%
1,001 - 3,000	19%	22%
3,001 - 5,000	4%	6%
5,001 - 10,000	2%	3%
10,001 +	0%	1%

n = 7,029

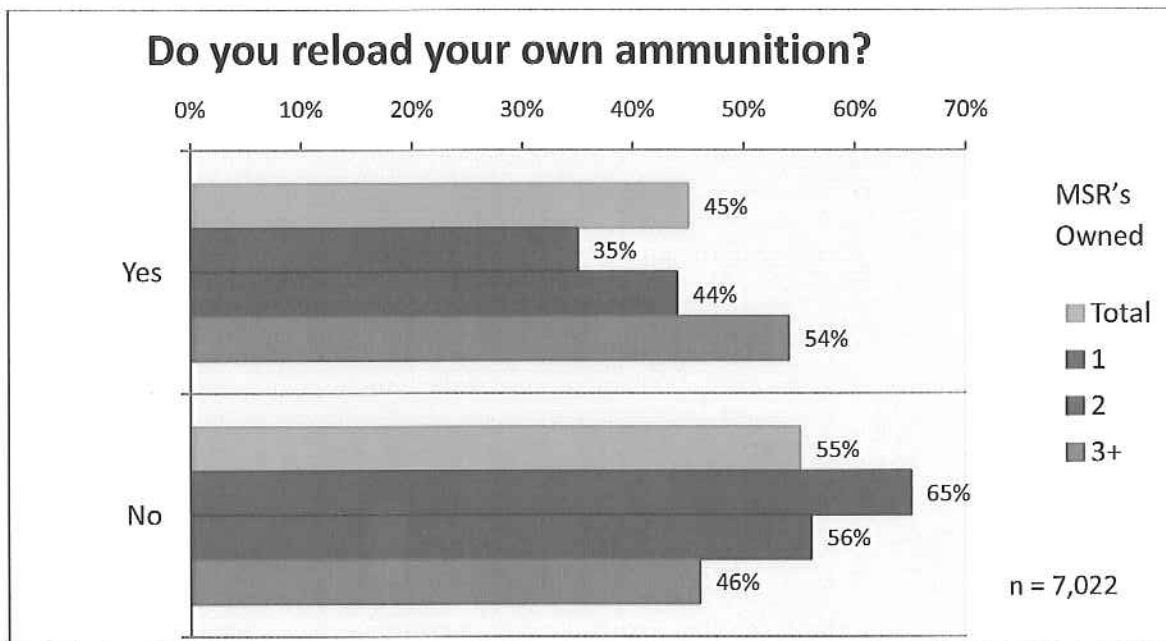
- A quarter of MSR owners fired 1,000 rounds or more in 2010. 32% anticipate firing more than 1,000 rounds in 2011.
- The average number of rounds fired was 1,056.

8.11 Ammo buying

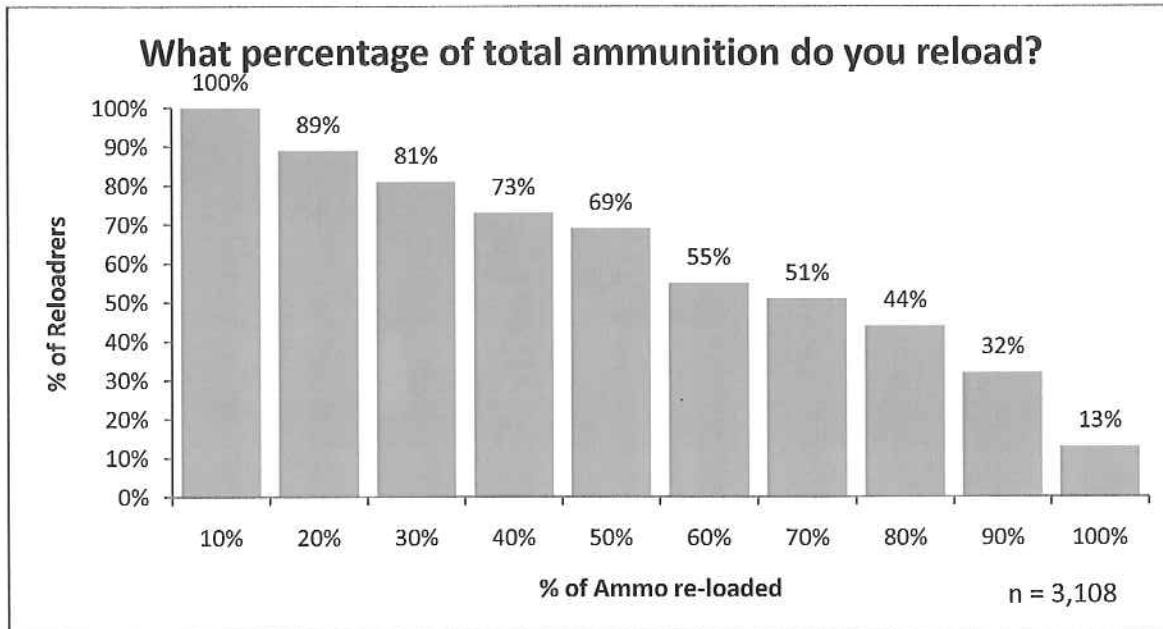


- 43% of owners buy 500+ rounds at one time. This rises to 57% for multiple MSR owners.

8.12 Reloading

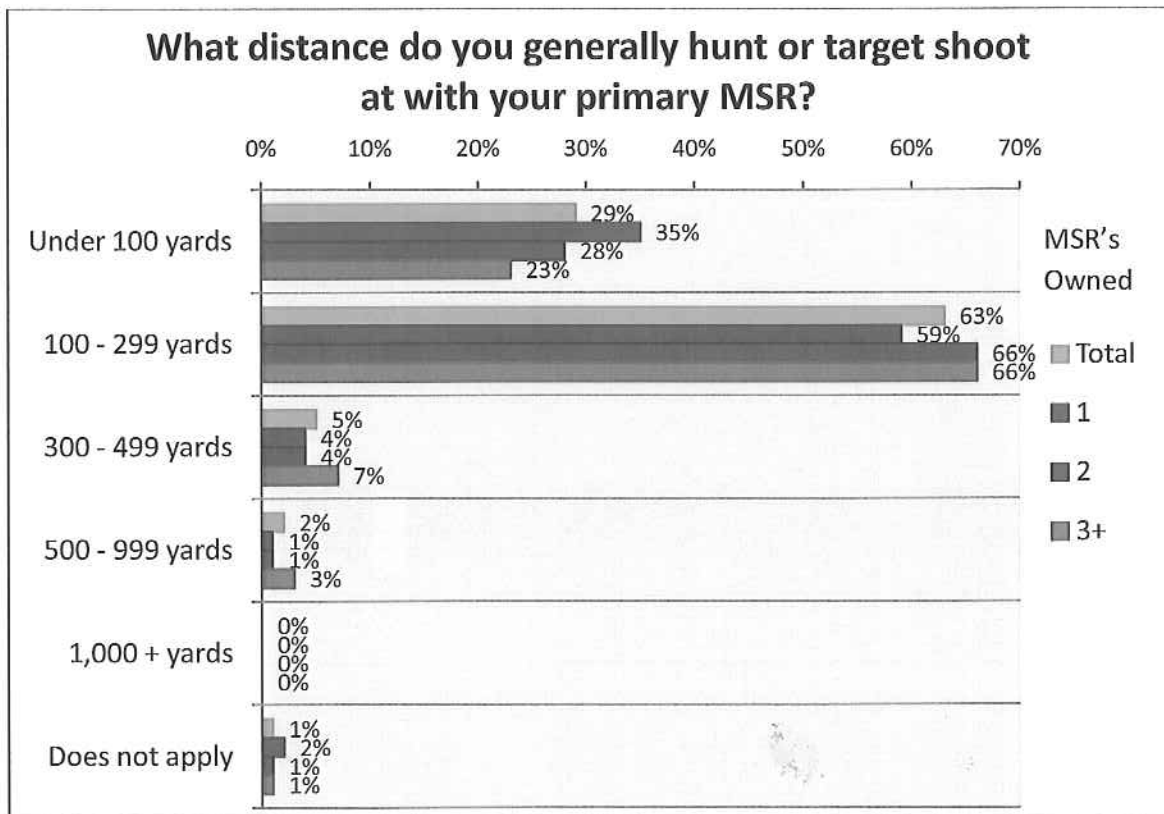


- 45% of MSR owners reload their own ammunition. This rises to 54% for multiple MSR owners.



- 7 out of 10 reloaders reload 50% or more of their ammo, 32% reload 90% or more.

8.13 MSR shooting distance

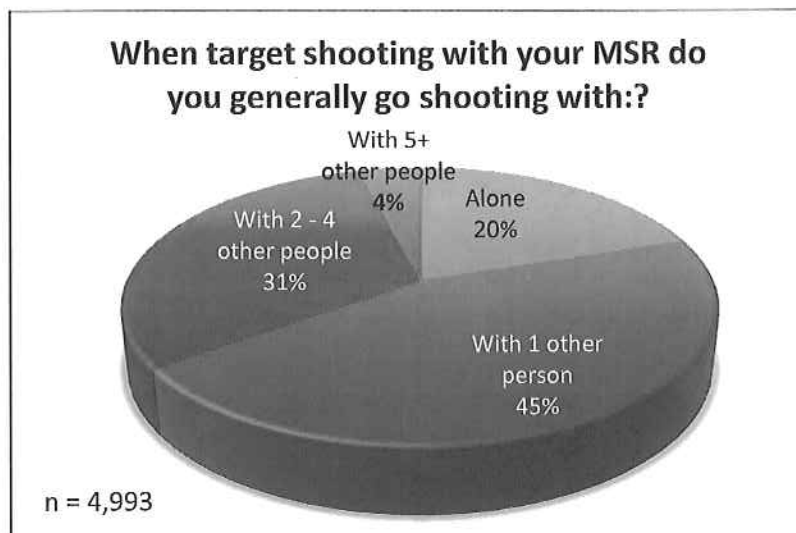


- The most popular distance to fire MSRs is 100-300 yards. Multiple MSR owners tend to shoot slightly longer distance.

n = 7,029

8.14 Who do you MSR shoot with

- 20% of MSR owners shoot alone. The most popular shooting party size is 2 with 45% of occasions.



8.15 Other firearm shooting activity

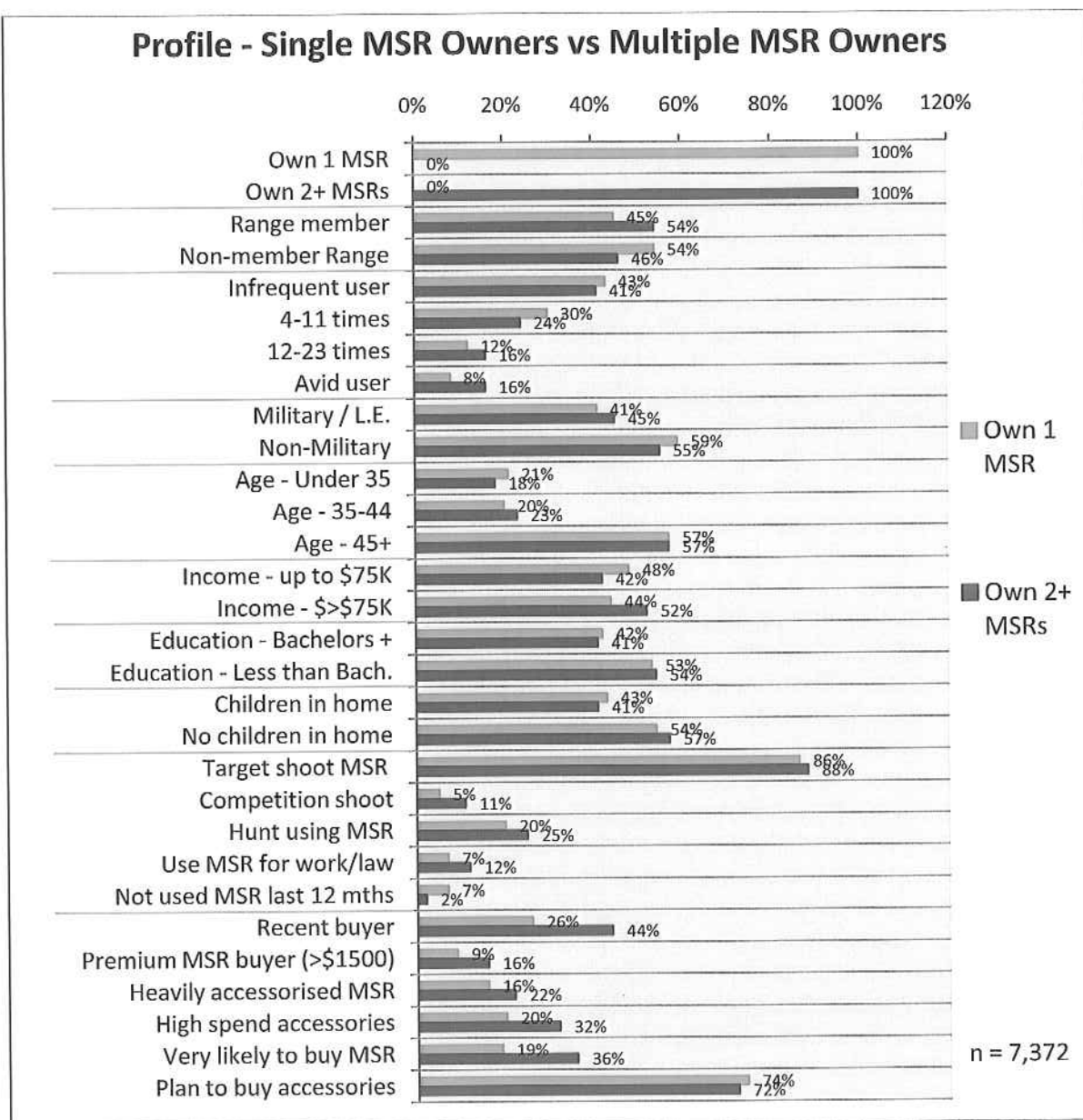
	Other Firearm	MSR
Handgun Target Shooting	72%	n/a
Hunting Big Game	37%	13%
Skeet Shooting	34%	n/a
Rifle Target Shooting	32%	86%
Hunting Small Game	31%	23%
Sporting Clays	30%	n/a
Trap Shooting	30%	n/a
Hunting Varmint	19%	37%
Competition Shooting	11%	14%

n = 7,387

- MSR owners participate in a wide variety of other shooting and hunting activities with other firearms. Nearly three-quarters also participate in handgun target shooting. Around a third also take part in big game hunting, skeet shooting, rifle target shooting, small game hunting and trap shooting.

9 PROFILES

9.1 Single MSR owners vs Multiple MSR owners

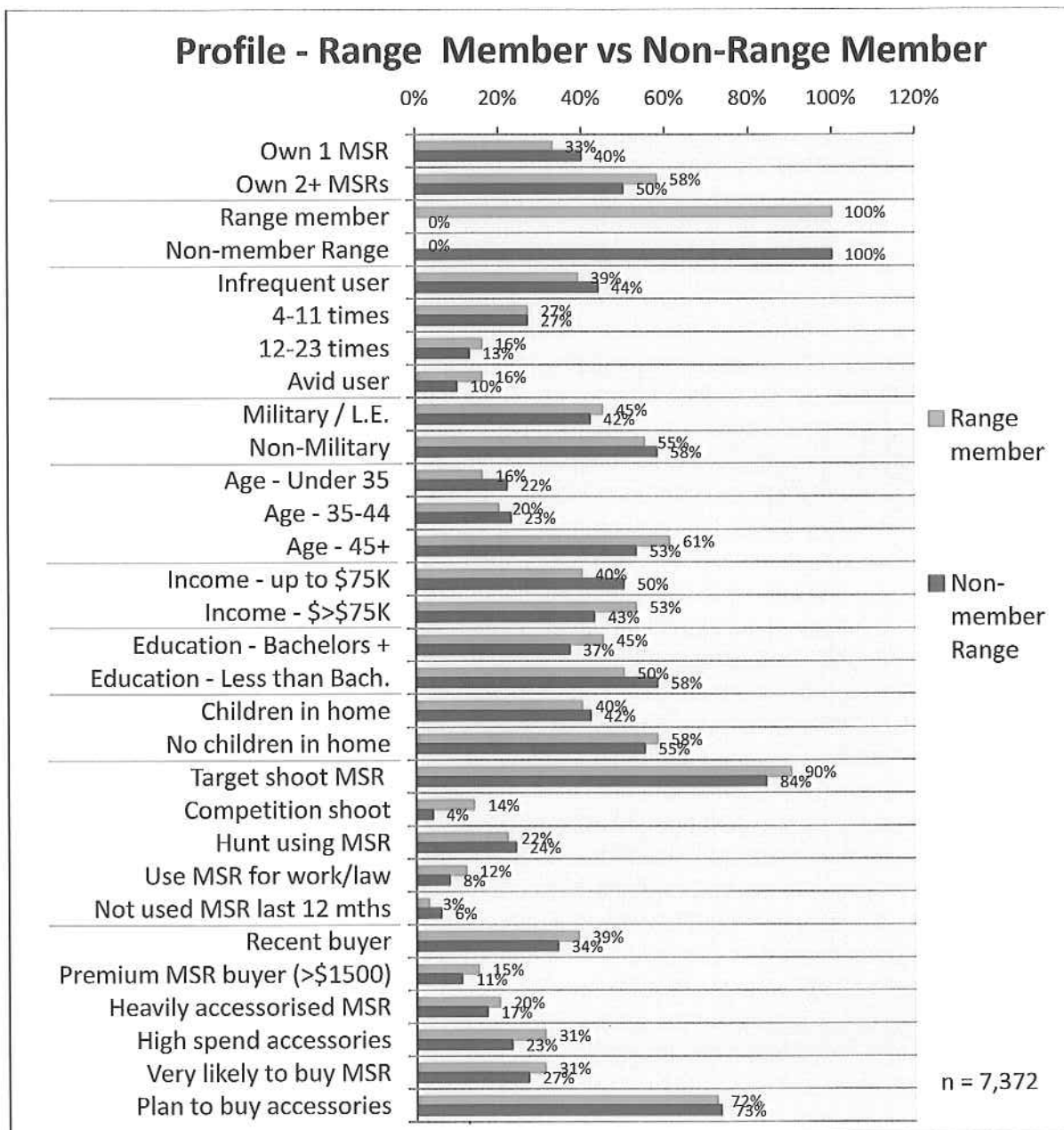


Multiple MSR owners are relatively more likely to be:

- A range member
- A frequent or avid user
- From a military background
- Age 35-44
- Earn over \$75,000
- No children at home
- Competition shooter
- Hunt using the MSR
- Recent MSR buyer
- Heavily accessorized MSR
- High spenders on MSR and accessories

Please note: some of the percentages for each sub-group will not add to 100% due to non-responses

9.2 Range Member vs Non-Range Member

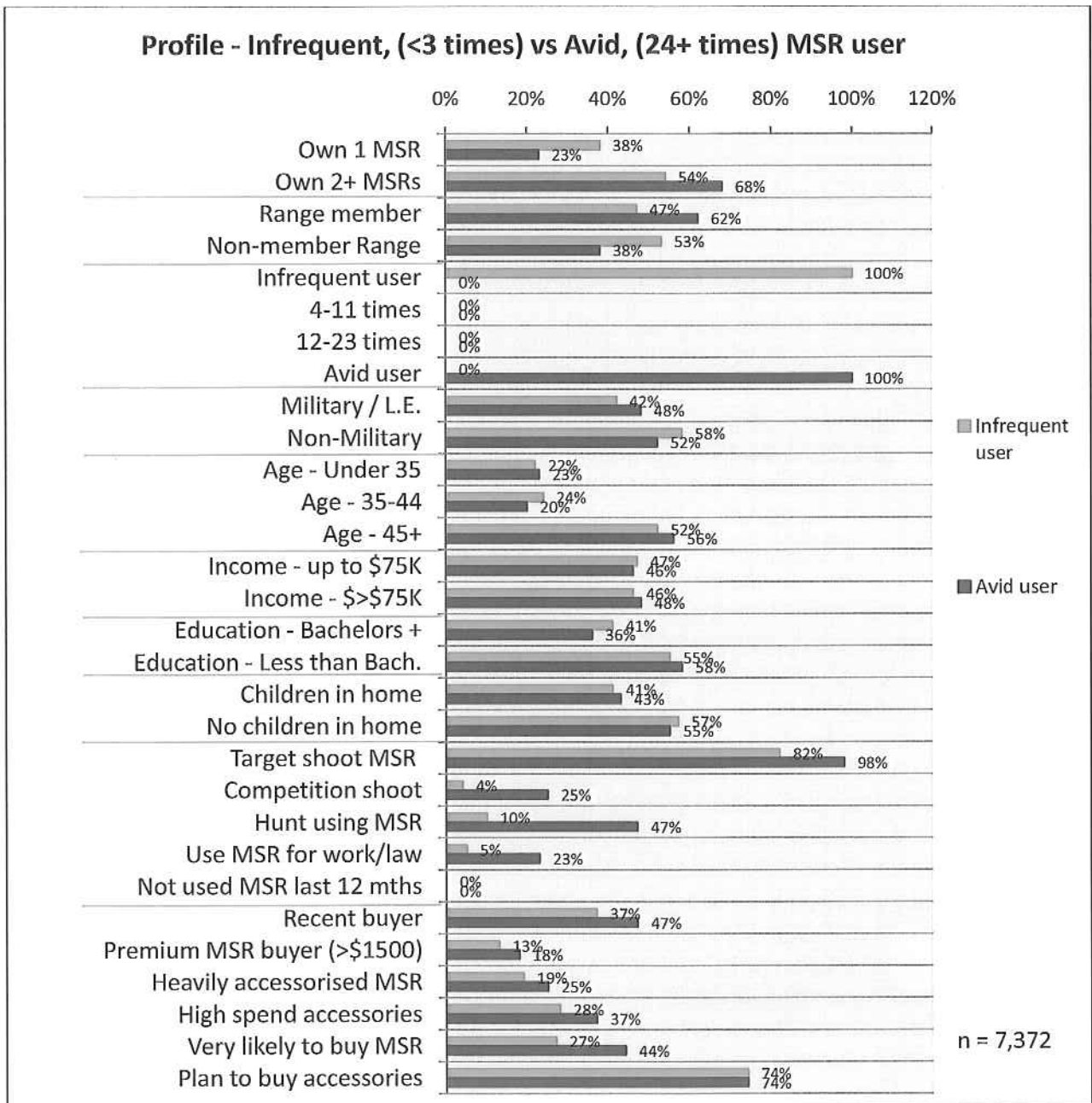


Range members are relatively more likely to be:

- Own multiple MSRs
- An avid MSR user
- Age under 45
- Income over \$75K
- Well educated
- Have no children at home
- A competition shooter
- A recent MSR buyer
- Heavily accessorized
- Premium MSR buyer
- Very likely to buy an MSR in the next 12 months.

Please note: some of the percentages for each sub-group will not add to 100% due to non-responses

9.3 Infrequent MSR User vs Avid User

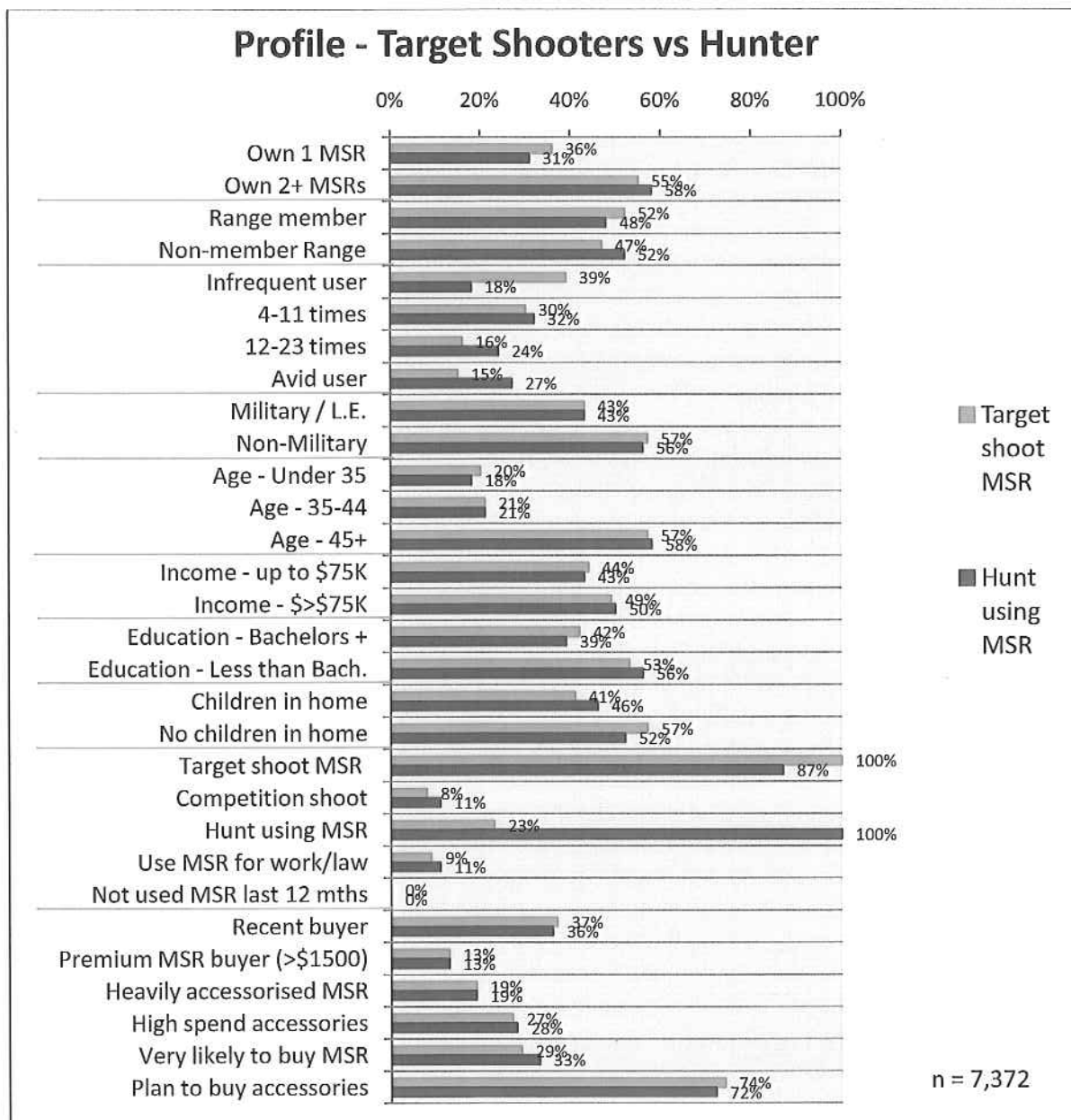


Avid MSR users are relatively more likely to be:

- A range member
- Own multiple MSRs
- Military background
- Age 45 and over
- Competition shooter, hunters and use MSR for work/law enforcement
- A recent MSR buyer
- A premium MSR buyer
- Heavily accessorised MSR

Please note: some of the percentages for each sub-group will not add to 100% due to non-responses

9.4 Target Shooters vs Hunters

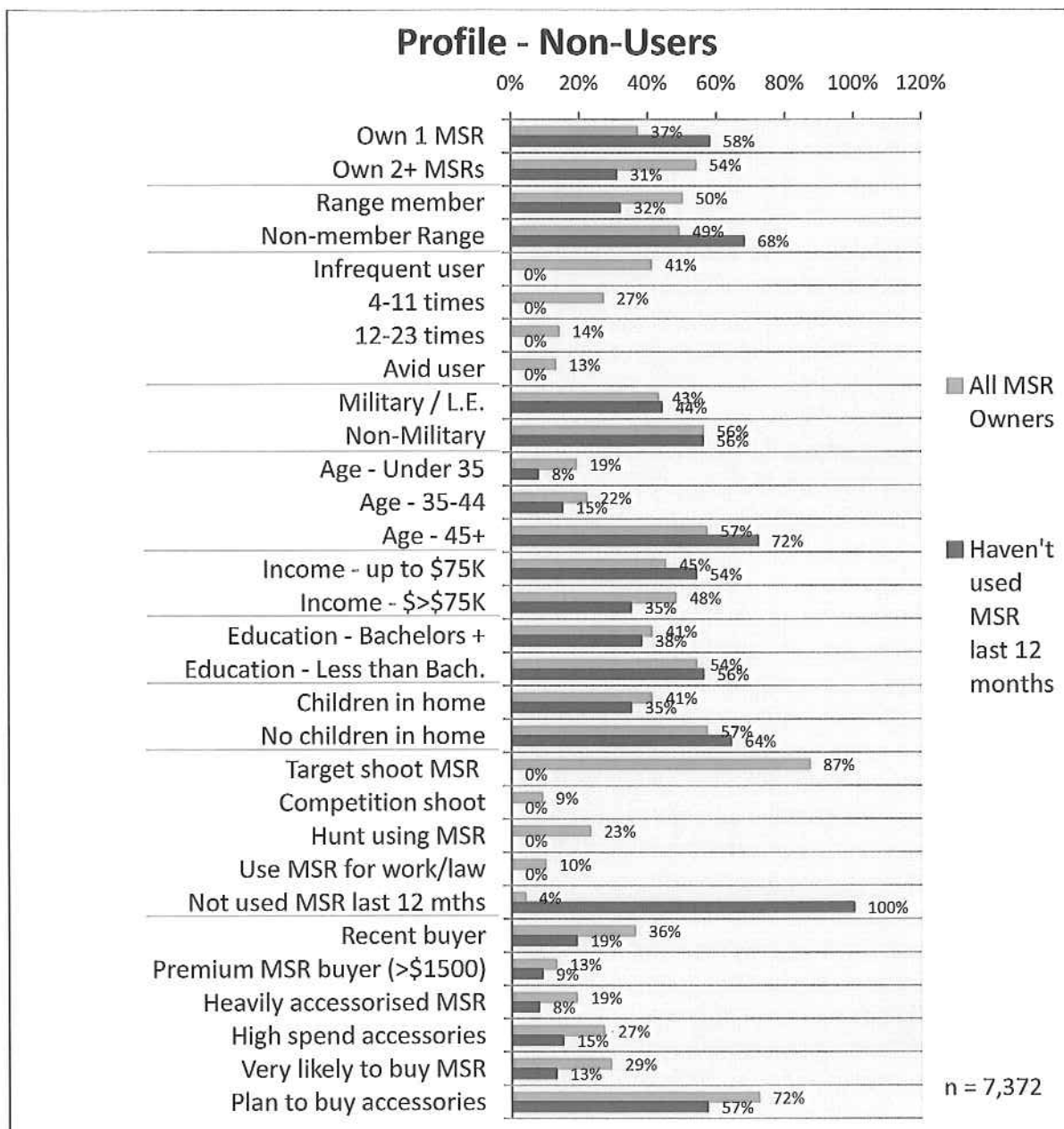


Target shooters and hunters have very similar profiles. Hunters are slightly more likely to be:

- Multiple MSR owners
- Not be a member of a range
- Less well educated
- Be an avid user
- More likely to buy an MSR in the next 12 months.

Please note: some of the percentages for each sub-group will not add to 100% due to non-responses

9.5 Owners who don't use their MSRs



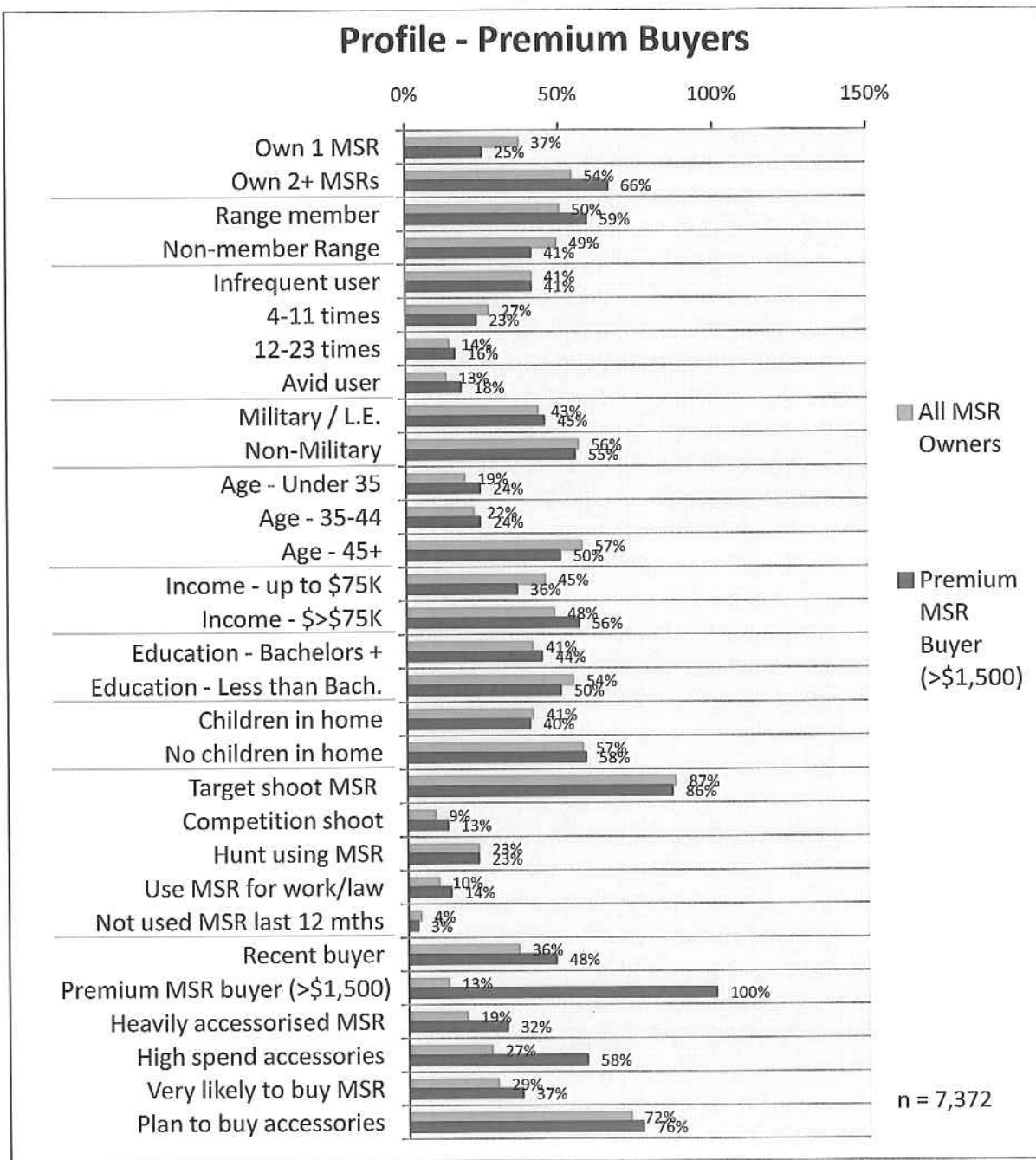
Non-MSR users are relatively more likely to be:

- Single MSR owners
- Non-range member
- Age over 45
- No children at home
- Have fewer accessories
- Spend less on MSR
- Less likely to buy in the next 12 months.

Please note: some of the percentages for each sub-group will not add to 100% due to non-responses

EXHIBIT B
(3 of 3)

9.6 Premium Buyers

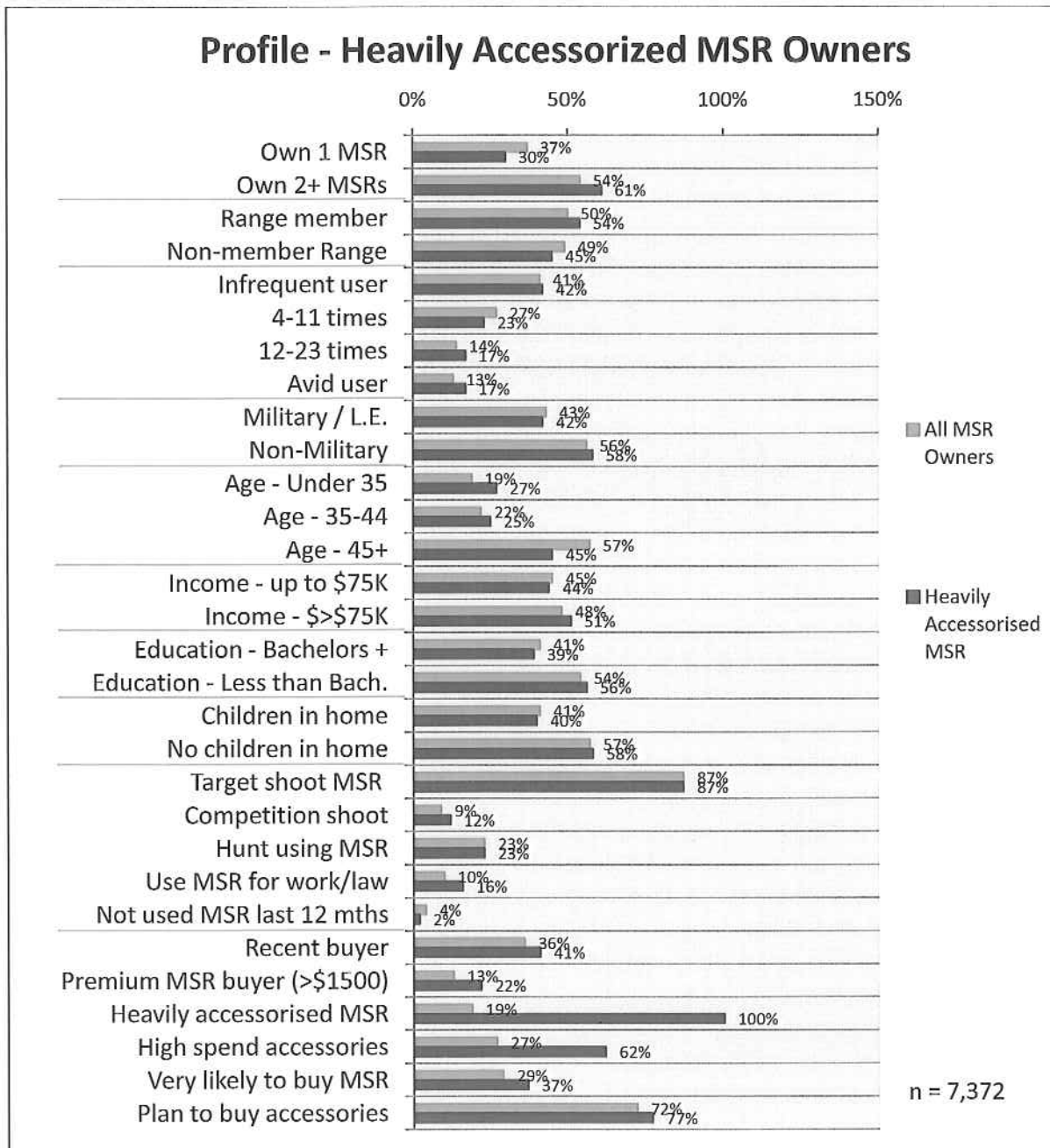


Premium buyers are relatively more likely to be:

- A range member
- Own multiple MSRs
- Avid users
- High spenders on accessories
- Very likely to buy in next 12 months.

Please note: some of the percentages for each sub-group will not add to 100% due to non-responses

9.7 Owners of Heavily Accessorized MSRs

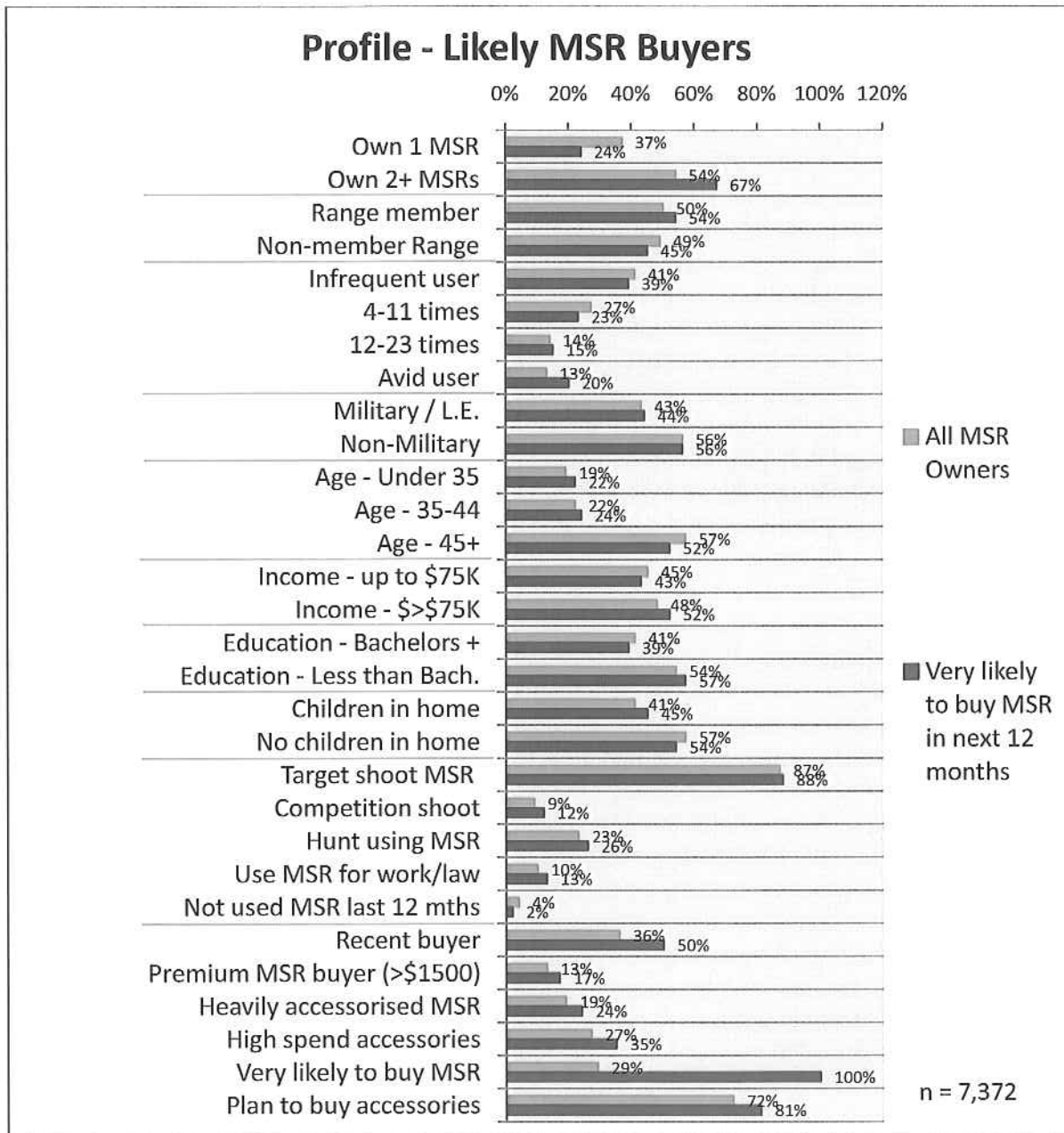


Owners of heavily accessorized MSRs are relatively more likely to be:

- A range member
- Own multiple MSRs
- Avid users
- Use MSR for work
- Premium MSR buyer
- Very likely to buy MSR in the next 12 months.

Please note: some of the percentages for each sub-group will not add to 100% due to non-responses

9.8 Likely MSR Buyers

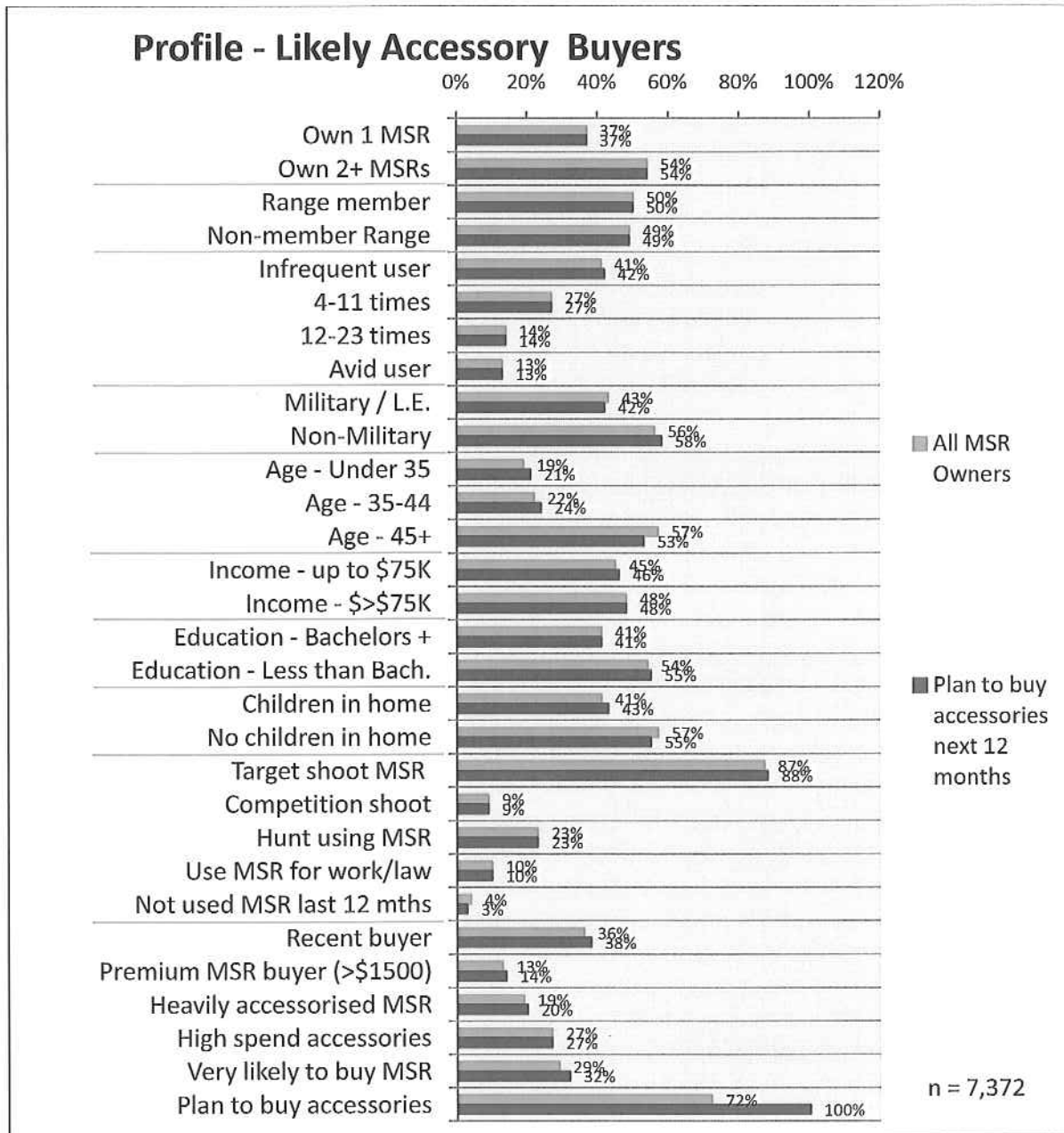


Likely MSR buyers are relatively more inclined to be:

- A range member
- Own multiple MSRs
- Avid users
- Age under 45
- Income >\$75K
- Children at home
- Recent buyer and high accessory spender

Please note: some of the percentages for each sub-group will not add to 100% due to non-responses

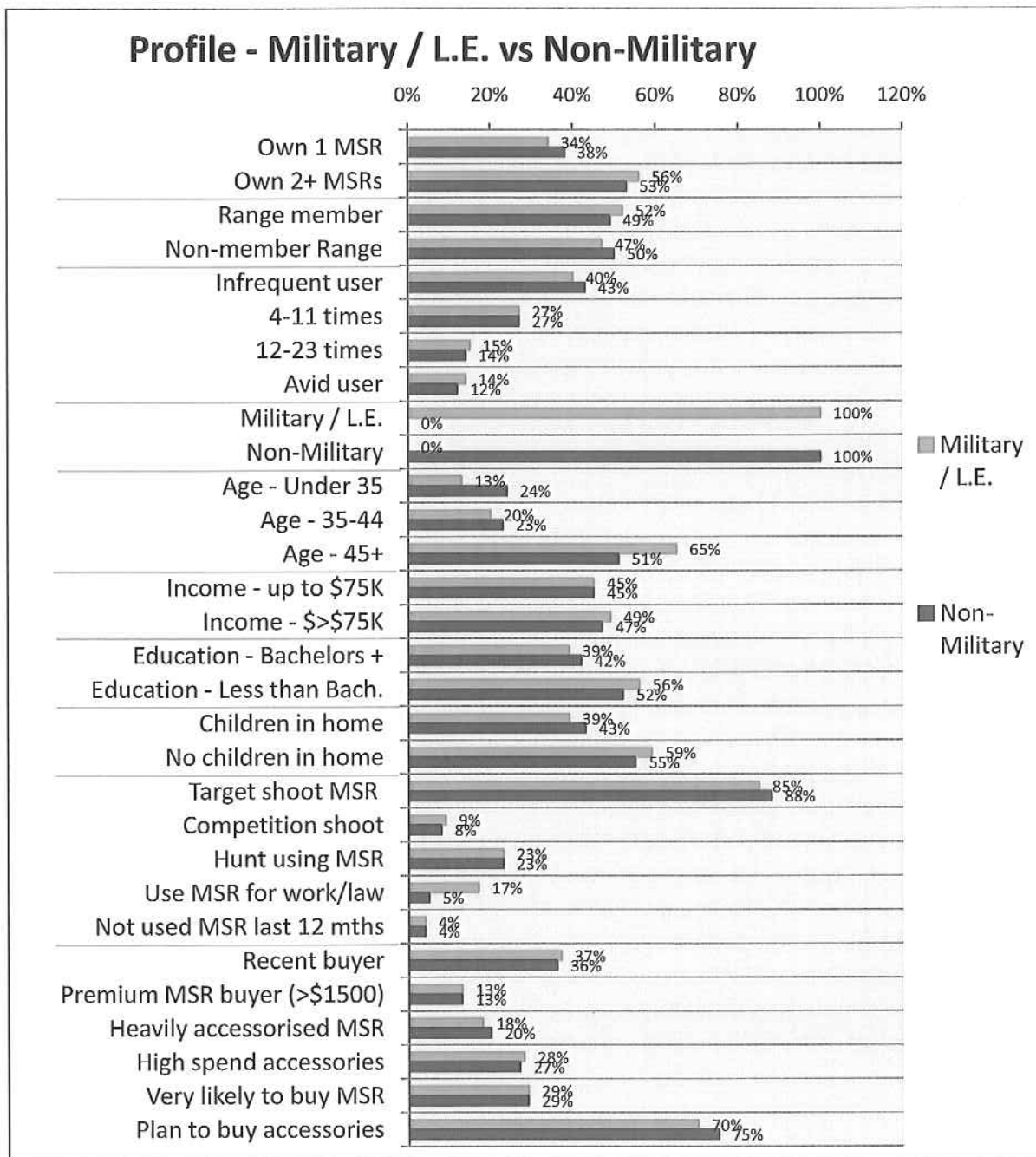
9.9 Likely Accessory Buyers



- The profile of likely accessory buyers is very similar to the overall profile of MSR owners indicating the high potential across all sub-groups.

Please note: some of the percentages for each sub-group will not add to 100% due to non-responses

9.10 Military vs Non-Military



MSR owners with a military background are relatively more likely to be:

- Range members
- Age 45+
- Higher income
- Slightly less well educated
- Multiple MSR owner

Please note: some of the percentages for each sub-group will not add to 100% due to non-responses

9.11 Favorite MSR related Magazine's in alphabetical order

Favorite Magazine
American Hunter
American Rifleman
Gun Digest
Guns
Guns and Ammo
Handloader
Rifle Shooter
Shooting Illustrated
Shooting Times
Shotgun News
Small Arms Review
SWAT
Tactical Weapons

9.12 Favorite MSR related Website/Blog(s) in alphabetical order

Favorite Website/Blog
450Bushmaster.net
AR15.com
ar15armory.com
Argunsandhunting.com
Brownells.com
calguns.net
dpmsinc.com
gunblast.com
GunBroker.com
GunDigest.com
GunsandAmmo.com
m4carbine.net

10 CLUSTER ANALYSIS/MARKET SEGMENTATION

Explanation of Cluster Analysis/Market Segmentation Analysis

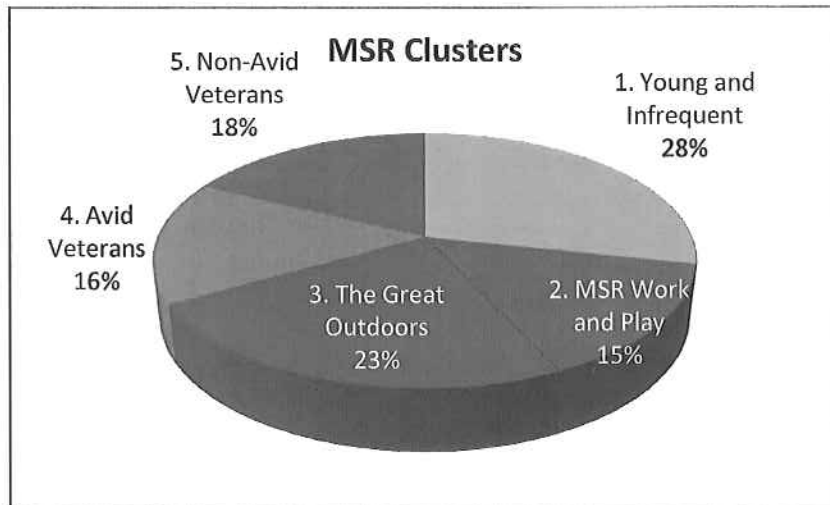
A Cluster Analysis or Market Segmentation is a concept that was developed to help marketers identify specific consumer groups based on a specific set and sub-set of demographic and specific product usage patterns. Market segmentation means dividing the market into distinct groups of individual segments or clusters with similar wants or needs and behaviors. A market segment or cluster is a sub-set of a people. In this case it is MSR owners with one or more characteristics that cause them to demand similar product and/or services based on qualities of those products: such as, usage, activity and demographics. A true market segment meets all of the following criteria: it is distinct from other segments (different segments have different needs), it is homogeneous within the segment (exhibits common needs), and it responds similarly to a market stimulus and media.

Using a cluster analysis technique and the following variables:

- Age
- Reasons for owning
- What is your estimated yearly household income?
- How many MSRs do you own?
- Law Enforcement or Military

We established 5 clusters:

1. Young and Infrequent
2. MSR Work and Play
3. The Great Outdoors
4. Avid Veterans
5. Non-Avid Veterans

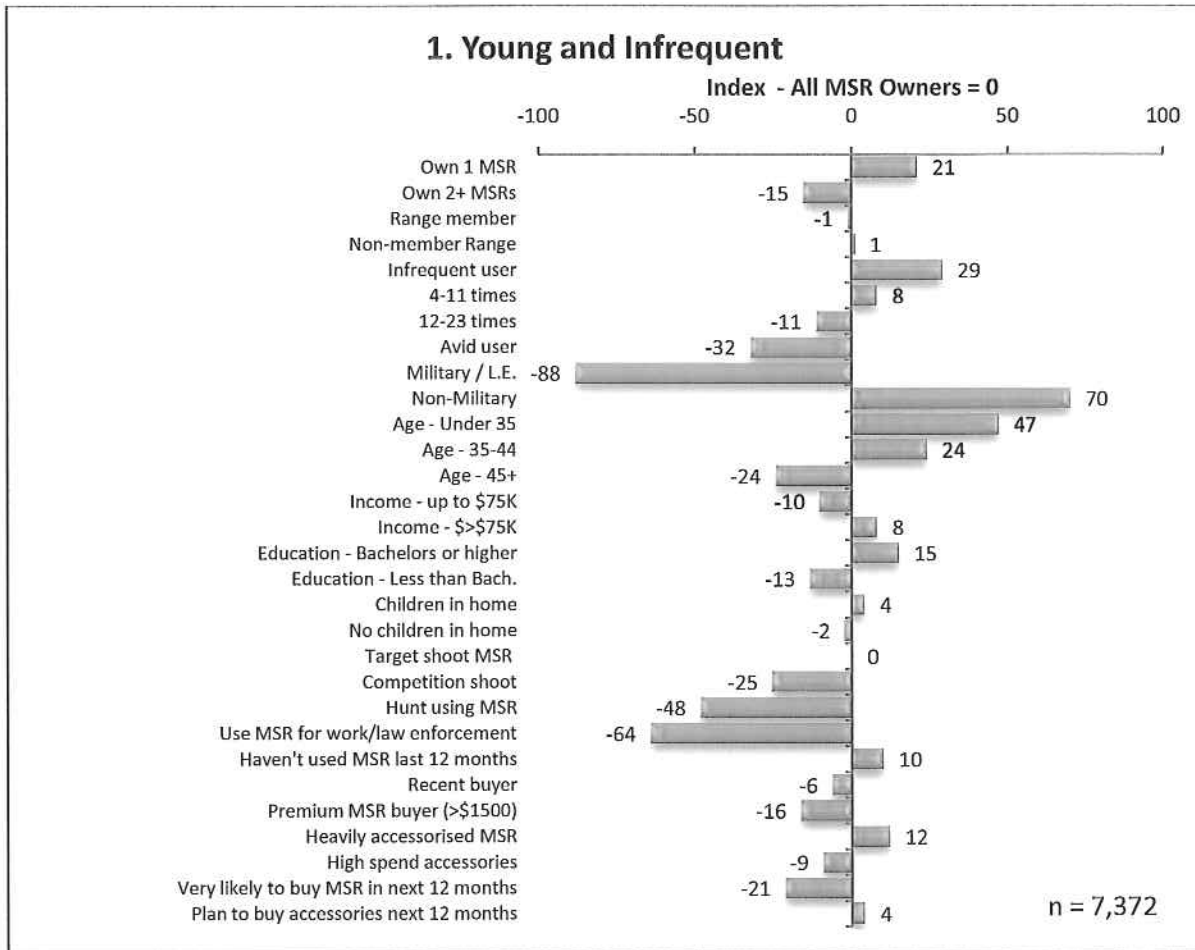


How to Read the Cluster Charts

In all of the cluster charts the sample profile is 0. An index of +20 means the cluster is 20% more likely to exhibit that behavior. So for example Cluster 1 is 21% more likely to own a single MSR and 15 less likely to own multiple MSRs.

n = 7,372

10.1 Cluster 1 - Young and Infrequent

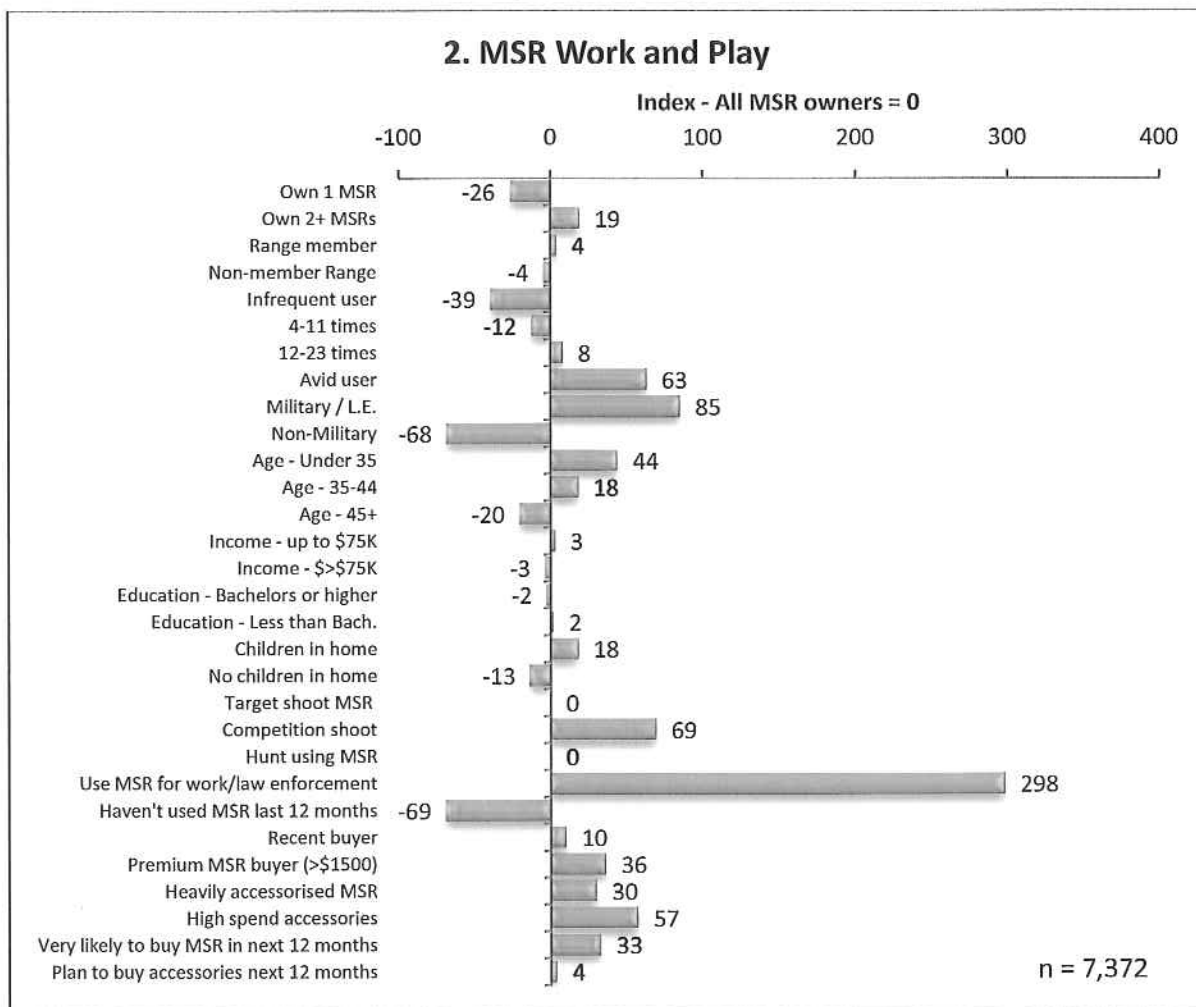


Cluster 1 – Young and Infrequent make up 28% of MSR owners. They tend to be:

- Non-military
- Age under 35
- Well educated
- Non-hunters
- Less likely to buy an MSR in the next 12 months
- Less likely to hunt or compete.



10.2 Cluster 2 – MSR Work and Play

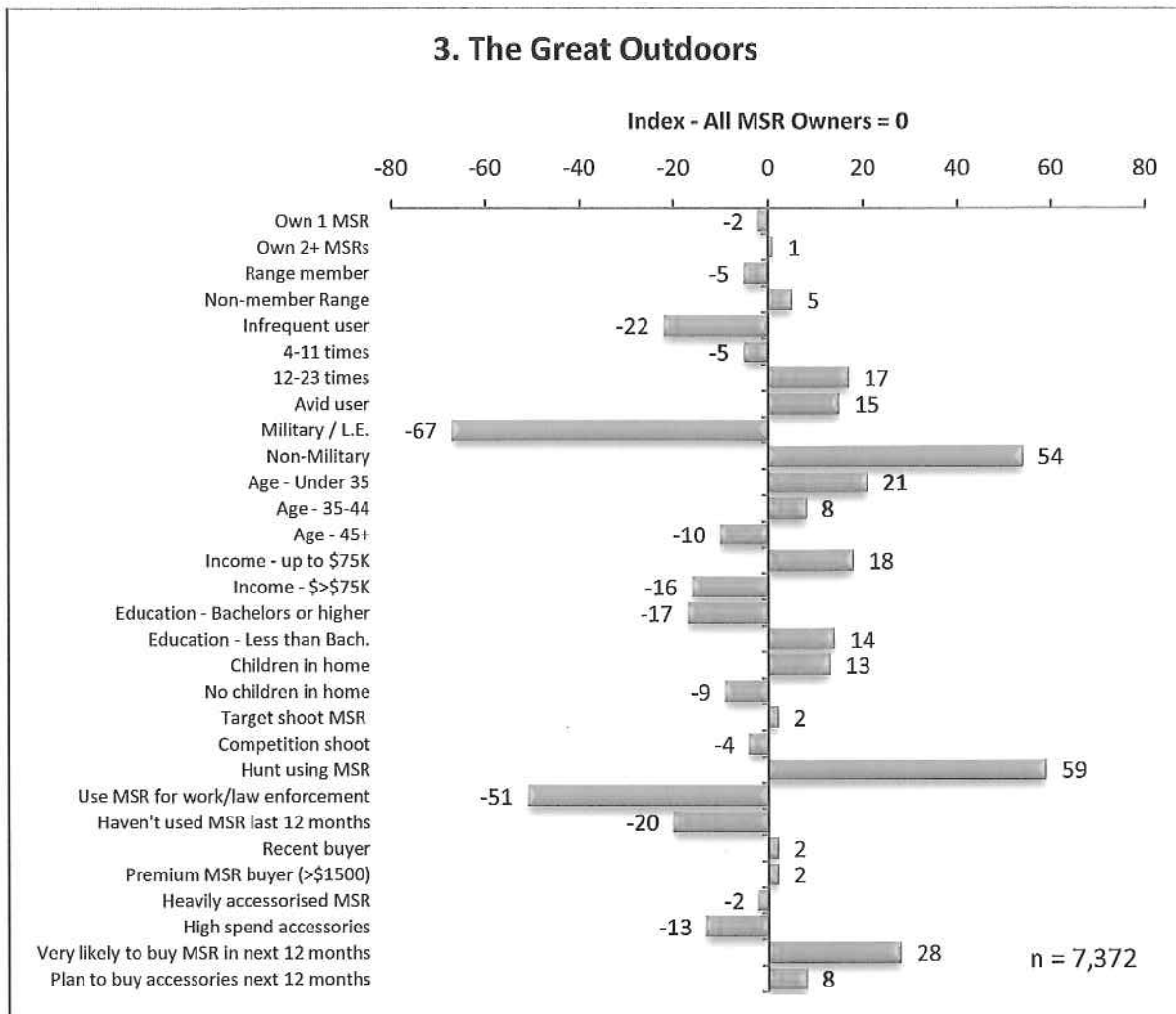


Cluster 2 – MSR Work and Play make up 18% of MSR owners. They tend to be:

- Avid, multiple MSR owners
- Military background
- Age under 35
- Competition shooters
- Go hunting
- Use MSR for work.



10.3 Cluster 3 – The Great Outdoors

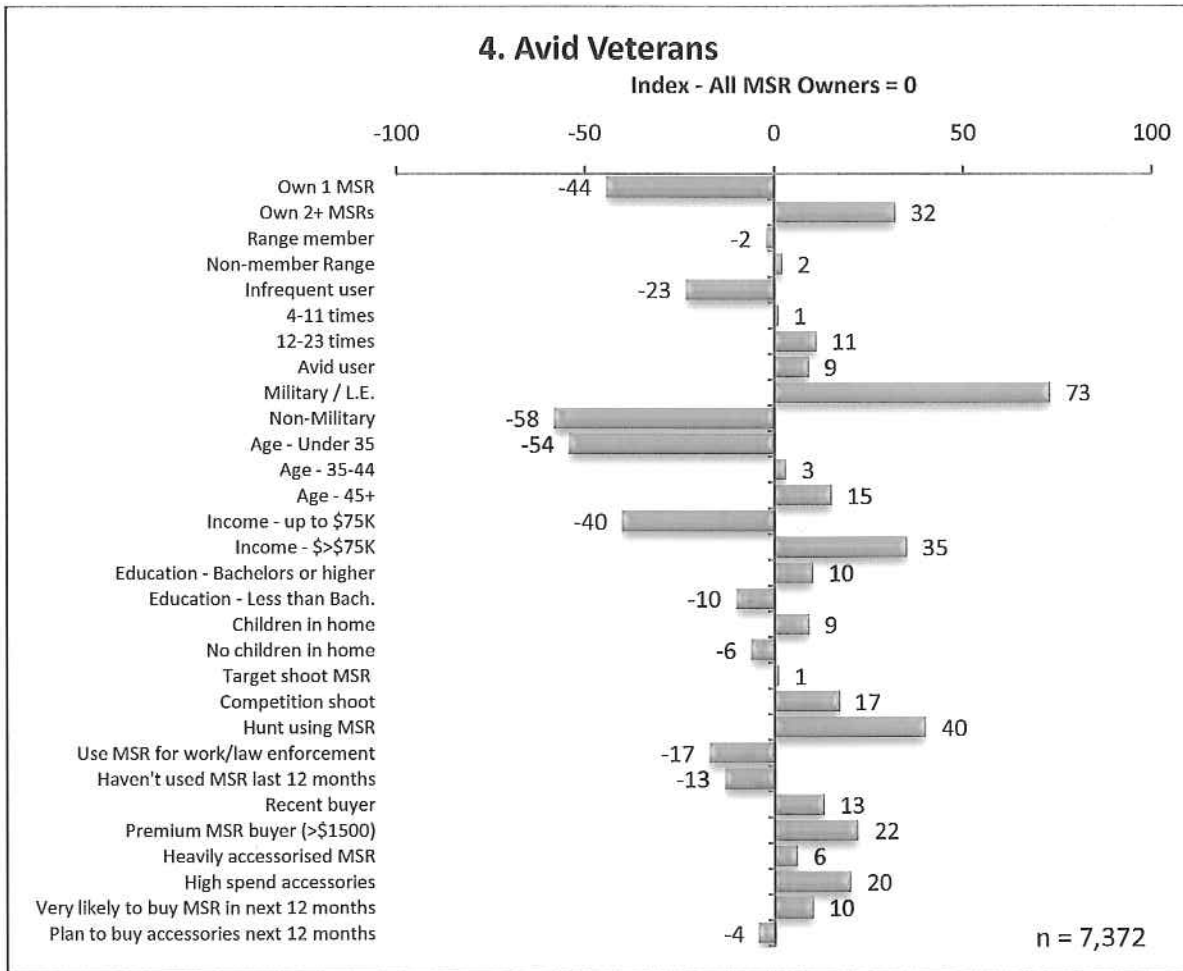


The Great Outdoors accounts for 23% of MSR owners. They tend to be:

- Age under 45
- Lower income
- Likely to buy MSR
- Less well educated
- Hunters.



10.4 Cluster 4 – Avid Veterans

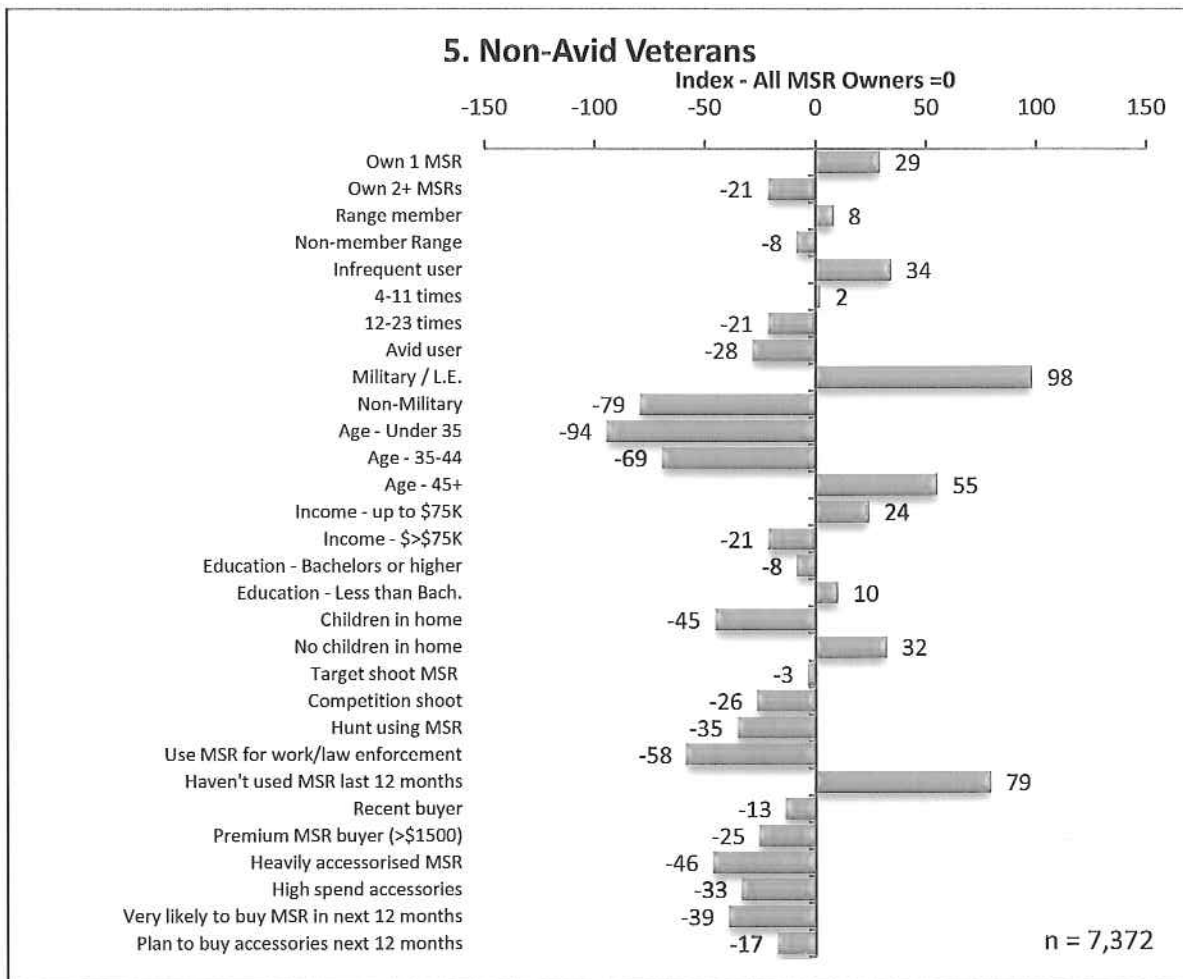


Avid Veterans account for 16% of all MSR owners. They tend to be:

- Age over 35
- Well educated
- Collectors
- Hunters.

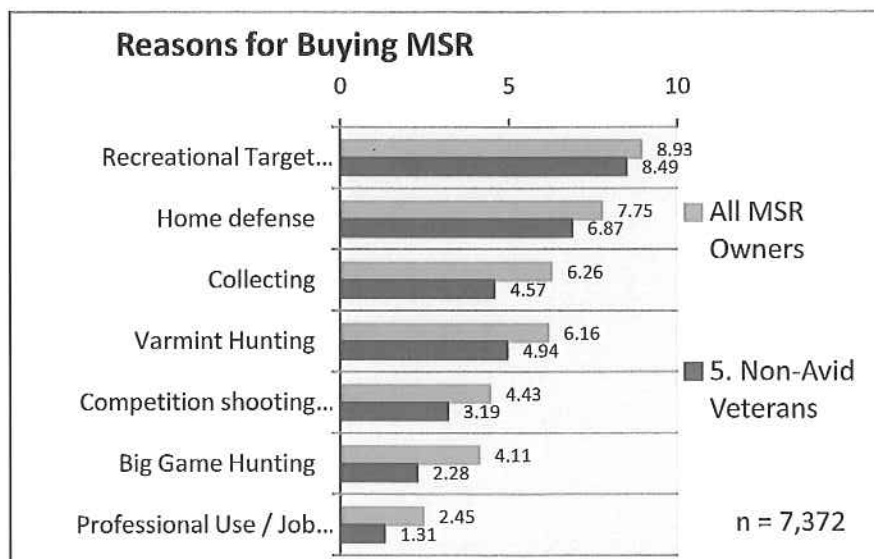


10.5 Cluster 5 – Non-Avid Veterans



Non-Avid Veterans account for 18% of all MSR owners. They tend to be:

- Non users
- Single MSR
- Less likely to buy MSR and accessories
- Age 45+
- No children at home
- Lower income



11 CROSS-TABULATIONS

The following data is provided to allow reader to perform additional detailed and specific analysis.

Q2.2 How many MSRs do you own?

[illegible]

Q2.3 When did you purchase / obtain your first NSR?

[illegible]

Q2.4 Which of the following did you purchase or own previous to owning a MSR?

		If more than one			Range Membership			If times used in last 12 months			Rebad Arrows?			Law Enforcement or Military			Age			Income			Education		Marital Status		Children?				
		Total	1	2	3+	Non-Member	3 times or more	Less than 3 times	4-7	8-11	12-23	24+	Rebader	Non-Rebader	Military / I.E.	Non-Military / I.E.	35-44	45-54	55-64	65+	\$45,000 or under	\$45,001 to \$75,000	\$75,001 to \$100,000	\$100,001+	Less than high school	High school or higher	Married	Not married	No children in home	Children in home	
7308	2867	1647	2243	3051	1971	1054	958	3130	3881	4533	3180	2200	4533	3180	2200	4533	3180	2200	45-54	55-64	65+	\$45,000 or under	\$45,001 to \$75,000	\$75,001 to \$100,000	\$100,001+	Less than high school	High school or higher	Married	Not married	No children in home	Children in home
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7308	2867	1647	2243	3051	1971	1054	958	3130	3881	4533	3180	2200	4533	3180	2200	4533	3180	2200	45-54	55-64	65+	\$45,000 or under	\$45,001 to \$75,000	\$75,001 to \$100,000	\$100,001+	Less than high school	High school or higher	Married	Not married	No children in home	Children in home
7308	2867	1647	2243	3051	1971	1054	958	3130	3881	4533	3180	2200	4533	3180	2200	4533	3180	2200	45-54	55-64	65+	\$45,000 or under	\$45,001 to \$75,000	\$75,001 to \$100,000	\$100,001+	Less than high school	High school or higher	Married	Not married	No children in home	Children in home
7308	2867	1647	2243	3051	1971	1054	958	3130	3881</																						

Q2.5 Where did you first gain interest in NCSA's?

1	2			3	4			5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466	467	468	469	470	471	472	473	474	475	476	477	478	479	480	481	482	483	484	485	486	487	488	489	490	491	492	493	494	495	496	497	498	499	500	501	502	503	504	505	506	507	508	509	510	511	512	513	514	515	516	517	518	519	520	521	522	523	524	525	526	527	528	529	530	531	532	533	534	535	536	537	538	539	540	541	542	543	544	545	546	547	548	549	550	551	552	553	554	555	556	557	558	559	560	561	562	563	564	565	566	567	568	569	570	571	572	573	574	575	576	577	578	579	580	581	582	583	584	585	586	587	588	589	590	591	592	593	594	595	596	597	598	599	600	601	602	603	604	605	606	607	608	609	610	611	612	613	614	615	616	617	618	619	620	621	622	623	624	625	626	627	628	629	630	631	632	633	634	635	636	637	638	639	640	641	642	643	644	645	646	647	648	649	650	651	652	653	654	655	656	657	658	659	660	661	662	663	664	665	666	667	668	669	670	671	672	673	674	675	676	677	678	679	680	681	682	683	684	685	686	687	688	689	690	691	692	693	694	695	696	697	698	699	700	701	702	703	704	705	706	707	708	709	710	711	712	713	714	715	716	717	718	719	720	721	722	723	724	725	726	727	728	729	730	731	732	733	734	735	736	737	738	739	740	741	742	743	744	745	746	747	748	749	750	751	752	753	754	755	756	757	758	759	760	761	762	763	764	765	766	767	768	769	770	771	772	773	774	775	776	777	778	779	780	781	782	783	784	785	786	787	788	789	790	791	792	793	794	795	796	797	798	799	800	801	802	803	804	805	806	807	808	809	810	811	812	813	814	815	816	817	818	819	820	821	822	823	824	825	826	827	828	829	830	831	832	833	834	835	836	837	838	839	840	841	842	843	844	845	846	847	848	849	850	851	852	853	854	855	856	857	858	859	860	861	862	863	864	865	866	867	868	869	870	871	872	873	874	875	876	877	878	879	880	881	882	883	884	885	886	887	888	889	890	891	892	893	894	895	896	897	898	899	900	901	902	903	904	905	906	907	908	909	910	911	912	913	914	915	916	917	918	919	920	921	922	923	924	925	926	927	928	929	930	931	932	933	934	935	936	937	938	939	940	941	942	943	944	945	946	947	948	949	950	951	952	953	954	955	956	957	958	959	960	961	962	963	964	965	966	967	968	969	970	971	972	973	974	975	976	977	978	979	980	981	982	983	984	985	986	987	988	989	990	991	992	993	994	995	996	997	998	999	1000	1001	1002	1003	1004	1005	1006	1007	1008	1009	1010	1011	1012	1013	1014	1015	1016	1017	1018	1019	1020	1021	1022	1023	1024	1025	1026	1027	1028	1029	1030	1031	1032	1033	1034	1035	1036	1037	1038	1039	1040	1041	1042	1043	1044	1045	1046	1047	1048	1049	1050	1051	1052	1053	1054	1055	1056	1057	1058	1059	1060	1061	1062	1063	1064	1065	1066	1067	1068	1069	1070	1071	1072	1073	1074	1075	1076	1077	1078	1079	1080	1081	1082	1083	1084	1085	1086	1087	1088	1089	1090	1091	1092	1093	1094	1095	1096	1097	1098	1099	1100	1101	1102	1103	1104	1105	1106	1107	1108	1109	1110	1111	1112	1113	1114	1115	1116	1117	1118	1119	1120	1121	1122	1123	1124
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Q2.6 Law Enforcement / Military (Active or Former)

	# MBR's own				Range Membership		If times used MBR last 12 months			Retired Annu?		Law Enforcement or Military		Age			Income		Education		Marital Status		Children?		
	Total	1	2	3+	Member	Non-Member	3 times or less	4-11	12-28	29+	Releaser	Non-Releaser	Military / L.E.	Under	35-44	45-54	55-64	\$45,000 to \$75,000	\$75,000 to \$100,000	Bachelor's or Higher	Mastered	Not Married	Children in home	No Children in home	
MBR #1 / L.E.	2132	2200	1640	2344	3726	3634	1060	1904	1256	559	3130	3852	3211	4163	1390	1388	1782	539	1959	1953	1587	3332	3120	3038	4183
MBR #2 / L.E.	448	433	413	468	456	426	426	426	426	489	456	426	426	426	294	294	394	546	426	426	426	364	419	456	456
MBR #3 / L.E.	534	502	528	542	536	548	548	528	548	528	504	584	504	1026	716	626	466	276	536	566	566	543	646	596	558

Q2.8 Do you currently have a membership at a local shooting range?

Q2.2 Do you currently have a membership at a local shooting range?																							
# M&R's own			Range Membership		If times used ASR last 12 months			Reload Ammo?		Law Enforcement or Military?		Age		Income		Education		Marital Status		Children?			
	1	2	3+	Non-Member	3+ Members	4-11	12-23	24+	Non-Reloader	Military / L.E.	Police	35-44	45-54	55-64	\$45,000 to \$75,000	\$75,000 to \$100,000	\$100,000+	Less than high school	Married	Not Married	Children in home	No children in home	
Total	7349	2084	1644	3727	3622	3051	1962	1051	955	3122	3889	3195	4244	1189	1584	1879	534	1321	1980	3318	1903	3029	4171
Total	5256	4894	2794	1000	104	4716	5736	5696	6296	5996	4096	5296	5896	6296	4096	4896	5296	5696	5096	4296	4896	5296	5896
Total	4894	5054	2794	1000	104	4716	5736	5696	6296	5996	4096	5296	5896	6296	4096	4896	5296	5696	5096	4296	4896	5296	5896

Q3.1 What your most recent NSR?

AGE 1 Was your most recent AGE?										AGE 8 If AGE's own										Range Membership										8 times used AGE last 12 months				Reduced Armes?		Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
Total		1		2		3+		Non-Member		Member		less		4-11		12-23		24+		Releasider		Non-Releasider		Military / L.E.		Unicep		35-44		45-54		55-64		65+		\$43,000 & under		\$45,001 to \$50,000		\$51,001 to \$100,000		Bachelor's or higher		Less than high school		Married		Single		On their own		No children in home	
7304	2684	1641	2123	3624	3589	3021	1959	1050	952	3258	3809	3179	4118	1386	1321	1880	1721	552	1166	1928	1573	1573	Married	Single	Divorced	Widowed	On own	No children in home																									
7104	2534	1534	2034	3534	3509	2921	1859	959	859	3059	3569	2829	4069	1329	1229	1779	1629	509	1109	1829	1479	1479	Married	Single	Divorced	Widowed	On own	No children in home																									
6904	2334	1334	1834	3334	3289	2821	1639	869	769	2839	3289	2539	3769	1139	1089	1539	1489	439	939	1639	1339	1339	Married	Single	Divorced	Widowed	On own	No children in home																									
6704	2134	1134	1634	3134	3089	2621	1439	769	669	2639	3089	2339	3539	1039	989	1439	1389	389	889	1539	1239	1239	Married	Single	Divorced	Widowed	On own	No children in home																									
6504	1934	934	1434	2934	2889	2421	1239	669	569	2239	2689	2039	3339	939	889	1239	1189	289	789	1339	1039	1039	Married	Single	Divorced	Widowed	On own	No children in home																									
6304	1734	734	1234	2734	2689	2221	1039	569	469	2039	2489	1839	3139	839	789	1039	989	189	689	1139	839	839	Married	Single	Divorced	Widowed	On own	No children in home																									
6104	1534	534	1034	2534	2489	2021	839	469	369	1839	2289	1639	2939	739	689	839	789	139	589	939	639	639	Married	Single	Divorced	Widowed	On own	No children in home																									
5904	1334	334	834	2334	2289	1821	639	369	269	1639	2089	1439	2739	639	589	639	589	89	489	739	439	439	Married	Single	Divorced	Widowed	On own	No children in home																									
5704	1134	134	634	2134	2089	1621	439	269	169	1439	1889	1239	2539	439	389	439	389	29	389	539	239	239	Married	Single	Divorced	Widowed	On own	No children in home																									
5504	934	134	434	1934	1889	1421	239	169	69	1239	1689	1039	2339	239	189	239	189	9	289	339	139	139	Married	Single	Divorced	Widowed	On own	No children in home																									
5304	734	134	234	1734	1689	1221	39	69	9	1039	1489	839	2139	39	89	39	89	9	189	239	139	139	Married	Single	Divorced	Widowed	On own	No children in home																									
5104	534	134	34	1534	1489	1021	19	69	9	839	1289	639	1939	19	69	19	69	9	89	139	139	139	Married	Single	Divorced	Widowed	On own	No children in home																									
4904	334	134	14	1334	1289	821	9	69	9	639	1089	439	1739	9	69	9	69	9	49	139	139	139	Married	Single	Divorced	Widowed	On own	No children in home																									
4704	134	134	4	1134	1089	621	9	69	9	439	889	239	1539	9	69	9	69	9	29	139	139	139	Married	Single	Divorced	Widowed	On own	No children in home																									

Q3.2 In what year did you receive your most recent MSR as a purchase/gift?

Q1.2 In what year did you receive your most recent MDR as a purchase/gift?	# MDR's own			Range Membership		# times used MDR last 12 months			Rebid Amount		Law Enforcement or Military		Age		Income			Education		Married Status		Children?	
	1	2	Total	Member	Non-Member	3+ times	4-11	12-23	24+	Rebid	Non-Rebid	Military / L.E.	Non-Military / L.E.	35-44	45-54	\$45,001 to \$75,001	\$75,001 to \$110,001	\$110,001 to \$145,001 or higher	Less than Bachelor's	Married	Not Married	On farm or home	No children in home
2008 or earlier	118	79	1,276	3,038	4,476	1,379	1,339	336	956	1,839	5,096	1,426	1,236	1,076	5,496	1,666	1,336	1,236	1,336	1,336	1,336	2,266	1,336
2009	483	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2010	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2011	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2012	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2013	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2014	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2015	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2016	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2017	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2018	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2019	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2020	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2021	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566
2022	296	296	2,966	3,566	3,566	2,966	3,566	3,566	2,966	3,566	3,566	3,566	3,566	2,966	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566	3,566

Q3.3 What was the [initial] price of your most recent MSR [new out of box cost]?

[illegible]

Q3.5 Where did you buy your most recent MSR?

Q15: Where did you buy your most recent house?										
	# AGENT's own	Range Membership	# times used MBE last 12 months	Refused Answer?	Law Enforcement or Military	Age	Income	Education	Marital Status	Children?
	1	None	3 times or	Refused Answer?	Law Enforcement or Military	Age	Income	Education	Marital Status	Children?
	2	Member	4-11	Refused Answer?	Law Enforcement or Military	Age	Income	Education	Marital Status	Children?
	3+	Member	12-23	Refused Answer?	Law Enforcement or Military	Age	Income	Education	Marital Status	Children?
	Total	Member	4-11	Refused Answer?	Law Enforcement or Military	Age	Income	Education	Marital Status	Children?
1	1021	3977	1331	1045	1045	35-44	\$75,001 to \$100,000	18-24	Married	1897
2	384	4667	1034	1045	1045	45-54	\$100,001 to \$150,000	25-34	Married	1034
3	384	4667	1034	1045	1045	55-64	\$150,001 to \$200,000	35-44	Married	1034
4	384	4667	1034	1045	1045	65-74	\$200,001 to \$250,000	45-54	Married	1034
5	384	4667	1034	1045	1045	75-84	\$250,001 to \$300,000	55-64	Married	1034
6	384	4667	1034	1045	1045	85-94	\$300,001 to \$350,000	65-74	Married	1034
7	384	4667	1034	1045	1045	95-104	\$350,001 to \$400,000	75-84	Married	1034
8	384	4667	1034	1045	1045	105-114	\$400,001 to \$450,000	85-94	Married	1034
9	384	4667	1034	1045	1045	115-124	\$450,001 to \$500,000	95-104	Married	1034
10	384	4667	1034	1045	1045	125-134	\$500,001 to \$550,000	105-114	Married	1034
11	384	4667	1034	1045	1045	135-144	\$550,001 to \$600,000	115-124	Married	1034
12	384	4667	1034	1045	1045	145-154	\$600,001 to \$650,000	125-134	Married	1034
13	384	4667	1034	1045	1045	155-164	\$650,001 to \$700,000	135-144	Married	1034
14	384	4667	1034	1045	1045	165-174	\$700,001 to \$750,000	145-154	Married	1034
15	384	4667	1034	1045	1045	175-184	\$750,001 to \$800,000	155-164	Married	1034
16	384	4667	1034	1045	1045	185-194	\$800,001 to \$850,000	165-174	Married	1034
17	384	4667	1034	1045	1045	195-204	\$850,001 to \$900,000	175-184	Married	1034
18	384	4667	1034	1045	1045	205-214	\$900,001 to \$950,000	185-194	Married	1034
19	384	4667	1034	1045	1045	215-224	\$950,001 to \$1,000,000	195-204	Married	1034
20	384	4667	1034	1045	1045	225-234	\$1,000,001 to \$1,050,000	205-214	Married	1034
21	384	4667	1034	1045	1045	235-244	\$1,050,001 to \$1,100,000	215-224	Married	1034
22	384	4667	1034	1045	1045	245-254	\$1,100,001 to \$1,150,000	225-234	Married	1034
23	384	4667	1034	1045	1045	255-264	\$1,150,001 to \$1,200,000	235-244	Married	1034
24	384	4667	1034	1045	1045	265-274	\$1,200,001 to \$1,250,000	245-254	Married	1034
25	384	4667	1034	1045	1045	275-284	\$1,250,001 to \$1,300,000	255-264	Married	1034
26	384	4667	1034	1045	1045	285-294	\$1,300,001 to \$1,350,000	265-274	Married	1034
27	384	4667	1034	1045	1045	295-304	\$1,350,001 to \$1,400,000	275-284	Married	1034
28	384	4667	1034	1045	1045	305-314	\$1,400,001 to \$1,450,000	285-294	Married	1034
29	384	4667	1034	1045	1045	315-324	\$1,450,001 to \$1,500,000	295-304	Married	1034
30	384	4667	1034	1045	1045	325-334	\$1,500,001 to \$1,550,000	305-314	Married	1034
31	384	4667	1034	1045	1045	335-344	\$1,550,001 to \$1,600,000	315-324	Married	1034
32	384	4667	1034	1045	1045	345-354	\$1,600,001 to \$1,650,000	325-334	Married	1034
33	384	4667	1034	1045	1045	355-364	\$1,650,001 to \$1,700,000	335-344	Married	1034
34	384	4667	1034	1045	1045	365-374	\$1,700,001 to \$1,750,000	345-354	Married	1034
35	384	4667	1034	1045	1045	375-384	\$1,750,001 to \$1,800,000	355-364	Married	1034
36	384	4667	1034	1045	1045	385-394	\$1,800,001 to \$1,850,000	365-374	Married	1034
37	384	4667	1034	1045	1045	395-404	\$1,850,001 to \$1,900,000	375-384	Married	1034
38	384	4667	1034	1045	1045	405-414	\$1,900,001 to \$1,950,000	385-394	Married	1034
39	384	4667	1034	1045	1045	415-424	\$1,950,001 to \$2,000,000	395-404	Married	1034
40	384	4667	1034	1045	1045	425-434	\$2,000,001 to \$2,050,000	405-414	Married	1034
41	384	4667	1034	1045	1045	435-444	\$2,050,001 to \$2,100,000	415-424	Married	1034
42	384	4667	1034	1045	1045	445-454	\$2,100,001 to \$2,150,000	425-434	Married	1034
43	384	4667	1034	1045	1045	455-464	\$2,150,001 to \$2,200,000	435-444	Married	1034
44	384	4667	1034	1045	1045	465-474	\$2,200,001 to \$2,250,000	445-454	Married	1034
45	384	4667	1034	1045	1045	475-484	\$2,250,001 to \$2,300,000	455-464	Married	1034
46	384	4667	1034	1045	1045	485-494	\$2,300,001 to \$2,350,000	465-474	Married	1034
47	384	4667	1034	1045	1045	495-504	\$2,350,001 to \$2,400,000	475-484	Married	1034
48	384	4667	1034	1045	1045	505-514	\$2,400,001 to \$2,450,000	485-494	Married	1034
49	384	4667	1034	1045	1045	515-524	\$2,450,001 to \$2,500,000	495-504	Married	1034
50	384	4667	1034	1045	1045	525-534	\$2,500,001 to \$2,550,000	505-514	Married	1034
51	384	4667	1034	1045	1045	535-544	\$2,550,001 to \$2,600,000	515-524	Married	1034
52	384	4667	1034	1045	1045	545-554	\$2,600,001 to \$2,650,000	525-534	Married	1034
53	384	4667	1034	1045	1045	555-564	\$2,650,001 to \$2,700,000	535-544	Married	1034
54	384	4667	1034	1045	1045	565-574	\$2,700,001 to \$2,750,000	545-554	Married	1034
55	384	4667	1034	1045	1045	575-584	\$2,750,001 to \$2,800,000	555-564	Married	1034
56	384	4667	1034	1045	1045	585-594	\$2,800,001 to \$2,850,000	565-574	Married	1034
57	384	4667	1034	1045	1045	595-604	\$2,850,001 to \$2,900,000	575-584	Married	1034
58	384	4667	1034	1045	1045	605-614	\$2,900,001 to \$2,950,000	585-594	Married	1034
59	384	4667	1034	1045	1045	615-624	\$2,950,001 to \$3,000,000	595-604	Married	1034
60	384	4667	1034	1045	1045	625-634	\$3,000,001 to \$3,050,000	605-614	Married	1034
61	384	4667	1034	1045	1045	635-644	\$3,050,001 to \$3,100,000	615-624	Married	1034
62	384	4667	1034	1045	1045	645-654	\$3,100,001 to \$3,150,000	625-634	Married	1034
63	384	4667	1034	1045	1045	655-664	\$3,150,001 to \$3,200,000	635-644	Married	1034
64	384	4667	1034	1045	1045	665-674	\$3,200,001 to \$3,250,000	645-654	Married	1034
65	384	4667	1034	1045	1045	675-684	\$3,250,001 to \$3,300,000	655-664	Married	1034
66	384	4667	1034	1045	1045	685-694	\$3,300,001 to \$3,350,000	665-674	Married	1034
67	384	4667	1034	1045	1045	695-704	\$3,350,001 to \$3,400,000	675-684	Married	1034
68	384	4667	1034	1045	1045	705-714	\$3,400,001 to \$3,450,000	685-694	Married	1034
69	384	4667	1034	1045	1045	715-724	\$3,450,001 to \$3,500,000	695-704	Married	1034
70	384	4667	1034	1045	1045	725-734	\$3,500,001 to \$3,550,000	705-714	Married	1034
71	384	4667	1034	1045	1045	735-744	\$3,550,001 to \$3,600,000	715-724	Married	1034
72	384	4667	1034	1045	1045	745-754	\$3,600,001 to \$3,650,000	725-734	Married	1034
73	384	4667	1034	1045	1045	755-764	\$3,650,001 to \$3,700,000	735-744	Married	1034
74	384	4667	1034	1045	1045	765-774	\$3,700,001 to \$3,750,000	745-754	Married	1034
75	384	4667	1034	1045	1045	775-784	\$3,750,001 to \$3,800,000	755-764	Married	1034
76	384	4667	1034	1045	1045	785-794	\$3,800,001 to \$3,850,000	765-774	Married	1034
77	384	4667	1034	1045	1045	795-804	\$3,850,001 to \$3,900,000	775-784	Married	1034
78	384	4667	1034	1045	1045	805-814	\$3,900,001 to \$3,950,000	785-794	Married	1034
79	384	4667	1034	1045	1045	815-824	\$3,950,001 to \$4,000,000	795-804	Married	1034
80	384	4667	1034	1045	1045	825-834	\$4,000,001 to \$4,050,000	805-814	Married	1034
81	384	4667	1034	1045	1045	835-844	\$4,050,001 to \$4,100,000	815-824	Married	1034
82	384	4667	1034	1045	1045	845-854	\$4,100,001 to \$4,150,000	825-834	Married	1034
83	384	4667	1034	1045	1045	855-864	\$4,150,001 to \$4,200,000	835-844	Married	1034
84	384	4667	1034	1045	1045	865-874	\$4,200,001 to \$4,250,000	845-854	Married	1034
85	384	4667	1034	1045	1045	875-884	\$4,250,001 to \$4,300,000	855-864	Married	1034
86	384	4667	1034	1045	1045	885-894	\$4,300,001 to \$4,350,000	865-874	Married	1034
87	384	4667	1034	1045	1045	895-904	\$4,350,001 to \$4,400,000	875-884	Married	1034
88	384	4667	1034	1045	1045	905-914	\$4,400,001 to \$4,450,000	885-894	Married	1034
89	384	4667	1034	1045	1045	915-924	\$4,450,001 to \$4,500,000	895-904	Married	1034
90	384	4667	1034	1045	1045	925-934	\$4,500,001 to \$4,550,000	905-914	Married	1034
91	384	4667	1034	1045	1045	935-944	\$4,550,001 to \$4,600,000	915-924	Married	1034
92	384	4667	1034	1045	1045	945-954	\$4,600,001 to \$4,650,000	925-934	Married	1034
93	384	4667	1034	1045	1045	955-964	\$4,650,001 to \$4,700,000	935-944	Married	1034
94	384	4667	1034	1045	1045	965-974	\$4,700,001 to \$4,750,000	945-954	Married	1034
95	384	4667	1034	1045	1045	975-984	\$4,750,001 to \$4,800,000	955-964	Married	1034
96	384	4667	1034	1045	1045	985-994	\$4,800,001 to \$4,850,000	965-974	Married	1034
97	384	4667	1034	1045	1045	995-1004	\$4,850,001 to \$4,900,000	975-984	Married	1034
98	384	4667	1034	1045	1045	1005-1014	\$4,900,001 to \$4,950,000	985-994	Married	1034
99	384	4667	1034	1045	1045	1015-1024	\$4,950,001 to \$5,000,000	995-1004	Married	1034
100	384	4667	1034	1045	1045	1025-1034	\$5,000,001 to \$5,050,000	1005-1014	Married	1034

03.7 What call has it while most recent MSG?

[illegible]

Q3.8 How important were each of the following reasons for buying your most recent MSR? (average)

ID	MSP's own										Range Membership			If times used MGR last 12 months			Law Enforcement or Military			Age					Income		Education		Marital Status		Children?	
	Total	1	2	3+	Member	Non-Member	Host	3 times or less	4-11	12-23	24+	Reoccur	Non-Reoccur	Military / LE	Non-Military / LE	Under	35	37-44	45-54	55-64	65+	\$45,000 or under	\$45,000 to \$79,999	\$80,000 to \$110,000	\$110,000+	Less than Bachelor's	Married	Not Married	Children in home	No children in home		
1	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
2	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
3	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
4	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
5	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
6	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
7	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
8	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
9	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
10	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
11	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
12	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
13	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
14	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
15	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
16	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
17	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
18	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
19	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
20	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
21	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
22	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
23	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
24	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
25	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
26	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
27	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
28	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
29	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
30	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
31	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
32	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
33	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
34	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
35	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
36	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
37	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
38	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
39	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
40	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
41	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
42	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06	9.11	9.05	8.95	9.11	9.00	8.95	9.08	9.08		
43	9.25	9.25	9.25	9.25	9.09	9.09	9.09	9.03	9.03	9.11	9.24	9.13	9.00	9.12	8.99	8.88	9.02	9.13	9.13	9.16	9.11	9.06										

Q3.9 I would consider my most recent MSR as I currently use it to be:

Is respondent's own?		Range Membership		If times used ASH last 12 months		Relief Annoy?		Law Enforcement or Military		Age		Income		Education		Marital Status		Children?		
1	2	3a	3b	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	
Total		Member	Non-Member	Less	12-23	24+	Releaser	Non-Releaser	Military / L.E.	35-44	45-54	55-64	\$45,000 to \$75,000	\$75,000 to \$150,000	High school or below	Married	Not Married	Children in home	No children	
7350	2487	1146	2138	3043	5909	1266	167	3127	3824	2100	1884	1778	533	1950	1584	3563	1509	3027	4176	4176
1816	1594	1526	1968	1874	2296	1874	1485	1656	1656	1174	2026	2176	1874	1656	1778	1874	1509	1678	1678	1678
8048	10256	6076	6280	6746	6534	6746	6534	6746	6534	6746	6534	6746	6534	6746	6534	6746	6534	6746	6534	6534
1594	1656	2426	2426	1736	1856	2236	2356	1594	1856	2236	2356	2426	2036	2356	2426	2036	1816	2236	1936	1936

Q3.10 When did you add your accessories to your MSR?

12-10 When did you last use your accessions to your risk?		if MRF's own		Range Membership		# times used NGR last 12 months		Reload Ammo?		Law Enforcement or Military		Age		Income		Education		Married Status		Children?	
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
Total		2	2	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	
730k	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
100k	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
50k	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
25k	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
10k	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
5k	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
2k	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
1k	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
500	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
250	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
100	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
50	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
25	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
10	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
5	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
2	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
1	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
500	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
250	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
100	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
50	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
25	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
10	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
5	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
2	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
1	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
500	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
250	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
100	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
50	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
25	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
10	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
5	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
2	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
1	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
500	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
250	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
100	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
50	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
25	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
10	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
5	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
2	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
1	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
500	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
250	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
100	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
50	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
25	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
10	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
5	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
2	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
1	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
500	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
250	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
100	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
50	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
25	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
10	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
5	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
2	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
1	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	3584	
500	2624	1637	2228	3087	3387	3554	3954	4111	3538	3584	3584	3584	3584								

Q3.12 How much after market customization did you do to your most recent MSR in terms of dollars spent?

[illegible]

03.12 Primary & Secondary Optics

CS-12 Primary & Secondary Districts																							
	# MSP's own			Range Membership		# times used MRR last 12 months			Rec'd Anno?		Law Enforcement or Military		Age		Income		Education		Marital Status		Children?		
	1	2	3+	Members	Boys	Girls	4-11	12-23	24+	Recasser	Non-Recasser	Military / L.E.	Non-Military / L.E.	35-44	45-59	\$5,000-\$14,999	\$15,000-\$24,999	\$25,000 to \$49,999	Married	Not Married	Children in home	No children in home	
Total	3802	2672	1343	3305	3575	3029	1560	12723	264	3108	3867	3180	4114	1383	2802	3765	5213	1312	1969	5283	3395	3207	4321
Female	1822	1243	505	1556	1626	1329	729	4596	135	1585	1952	1526	2026	684	1242	1765	2356	584	924	2583	1594	1822	2243
Male	1980	1429	838	1749	1949	1700	833	8127	129	1523	1915	1654	2088	1700	1560	2000	2857	728	1045	2700	1603	1385	2078
Elementary	1822	1243	505	1556	1626	1329	729	4596	135	1585	1952	1526	2026	684	1242	1765	2356	584	924	2583	1594	1822	2243
Lower elementary	1822	1243	505	1556	1626	1329	729	4596	135	1585	1952	1526	2026	684	1242	1765	2356	584	924	2583	1594	1822	2243
Upper elementary	1822	1243	505	1556	1626	1329	729	4596	135	1585	1952	1526	2026	684	1242	1765	2356	584	924	2583	1594	1822	2243
Secondary	1980	1429	838	1749	1949	1700	833	8127	129	1523	1915	1654	2088	1700	1560	2000	2857	728	1045	2700	1603	1385	2078
Lower secondary	1980	1429	838	1749	1949	1700	833	8127	129	1523	1915	1654	2088	1700	1560	2000	2857	728	1045	2700	1603	1385	2078
Upper secondary	1980	1429	838	1749	1949	1700	833	8127	129	1523	1915	1654	2088	1700	1560	2000	2857	728	1045	2700	1603	1385	2078
Other	1822	1243	505	1556	1626	1329	729	4596	135	1585	1952	1526	2026	684	1242	1765	2356	584	924	2583	1594	1822	2243
Other Elementary	1822	1243	505	1556	1626	1329	729	4596	135	1585	1952	1526	2026	684	1242	1765	2356	584	924	2583	1594	1822	2243
Other Secondary	1980	1429	838	1749	1949	1700	833	8127	129	1523	1915	1654	2088	1700	1560	2000	2857	728	1045	2700	1603	1385	2078

Q3.13 What type of scope?

CLL3 What type of helper?																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
If MSP's own				Range Membership				# times used MGR last 12 months				Relaid Annua?		Law Enforcement or Military		Age		Income		Education		Marital Status		Children?																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
1	2	3-4	Total	1	2	3-4	Total	1 times or less	2 times	3 times or more	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
2646	975	811	2646	350	509	569	522	1251	1287	2148	2485	11	35	35-44	45-54	55-64	65+	\$43,000 & under	\$45,001 to \$50,000	\$51,001 to \$75,000	\$76,001 to \$100,000	Less than high school	High school	Bachelor's or higher	Married	Single	Divorced	Widowed	Never married	1 or more	2 or more	3 or more	4 or more	5 or more	6 or more	7 or more	8 or more	9 or more	10 or more	11 or more	12 or more	13 or more	14 or more	15 or more	16 or more	17 or more	18 or more	19 or more	20 or more	21 or more	22 or more	23 or more	24 or more	25 or more	26 or more	27 or more	28 or more	29 or more	30 or more	31 or more	32 or more	33 or more	34 or more	35 or more	36 or more	37 or more	38 or more	39 or more	40 or more	41 or more	42 or more	43 or more	44 or more	45 or more	46 or more	47 or more	48 or more	49 or more	50 or more	51 or more	52 or more	53 or more	54 or more	55 or more	56 or more	57 or more	58 or more	59 or more	60 or more	61 or more	62 or more	63 or more	64 or more	65 or more	66 or more	67 or more	68 or more	69 or more	70 or more	71 or more	72 or more	73 or more	74 or more	75 or more	76 or more	77 or more	78 or more	79 or more	80 or more	81 or more	82 or more	83 or more	84 or more	85 or more	86 or more	87 or more	88 or more	89 or more	90 or more	91 or more	92 or more	93 or more	94 or more	95 or more	96 or more	97 or more	98 or more	99 or more	100 or more	101 or more	102 or more	103 or more	104 or more	105 or more	106 or more	107 or more	108 or more	109 or more	110 or more	111 or more	112 or more	113 or more	114 or more	115 or more	116 or more	117 or more	118 or more	119 or more	120 or more	121 or more	122 or more	123 or more	124 or more	125 or more	126 or more	127 or more	128 or more	129 or more	130 or more	131 or more	132 or more	133 or more	134 or more	135 or more	136 or more	137 or more	138 or more	139 or more	140 or more	141 or more	142 or more	143 or more	144 or more	145 or more	146 or more	147 or more	148 or more	149 or more	150 or more	151 or more	152 or more	153 or more	154 or more	155 or more	156 or more	157 or more	158 or more	159 or more	160 or more	161 or more	162 or more	163 or more	164 or more	165 or more	166 or more	167 or more	168 or more	169 or more	170 or more	171 or more	172 or more	173 or more	174 or more	175 or more	176 or more	177 or more	178 or more	179 or more	180 or more	181 or more	182 or more	183 or more	184 or more	185 or more	186 or more	187 or more	188 or more	189 or more	190 or more	191 or more	192 or more	193 or more	194 or more	195 or more	196 or more	197 or more	198 or more	199 or more	200 or more	201 or more	202 or more	203 or more	204 or more	205 or more	206 or more	207 or more	208 or more	209 or more	210 or more	211 or more	212 or more	213 or more	214 or more	215 or more	216 or more	217 or more	218 or more	219 or more	220 or more	221 or more	222 or more	223 or more	224 or more	225 or more	226 or more	227 or more	228 or more	229 or more	230 or more	231 or more	232 or more	233 or more	234 or more	235 or more	236 or more	237 or more	238 or more	239 or more	240 or more	241 or more	242 or more	243 or more	244 or more	245 or more	246 or more	247 or more	248 or more	249 or more	250 or more	251 or more	252 or more	253 or more	254 or more	255 or more	256 or more	257 or more	258 or more	259 or more	260 or more	261 or more	262 or more	263 or more	264 or more	265 or more	266 or more	267 or more	268 or more	269 or more	270 or more	271 or more	272 or more	273 or more	274 or more	275 or more	276 or more	277 or more	278 or more	279 or more	280 or more	281 or more	282 or more	283 or more	284 or more	285 or more	286 or more	287 or more	288 or more	289 or more	290 or more	291 or more	292 or more	293 or more	294 or more	295 or more	296 or more	297 or more	298 or more	299 or more	300 or more	301 or more	302 or more	303 or more	304 or more	305 or more	306 or more	307 or more	308 or more	309 or more	310 or more	311 or more	312 or more	313 or more	314 or more	315 or more	316 or more	317 or more	318 or more	319 or more	320 or more	321 or more	322 or more	323 or more	324 or more	325 or more	326 or more	327 or more	328 or more	329 or more	330 or more	331 or more	332 or more	333 or more	334 or more	335 or more	336 or more	337 or more	338 or more	339 or more	340 or more	341 or more	342 or more	343 or more	344 or more	345 or more	346 or more	347 or more	348 or more	349 or more	350 or more	351 or more	352 or more	353 or more	354 or more	355 or more	356 or more	357 or more	358 or more	359 or more	360 or more	361 or more	362 or more	363 or more	364 or more	365 or more	366 or more	367 or more	368 or more	369 or more	370 or more	371 or more	372 or more	373 or more	374 or more	375 or more	376 or more	377 or more	378 or more	379 or more	380 or more	381 or more	382 or more	383 or more	384 or more	385 or more	386 or more	387 or more	388 or more	389 or more	390 or more	391 or more	392 or more	393 or more	394 or more	395 or more	396 or more	397 or more	398 or more	399 or more	400 or more	401 or more	402 or more	403 or more	404 or more	405 or more	406 or more	407 or more	408 or more	409 or more	410 or more	411 or more	412 or more	413 or more	414 or more	415 or more	416 or more	417 or more	418 or more	419 or more	420 or more	421 or more	422 or more	423 or more	424 or more	425 or more	426 or more	427 or more	428 or more	429 or more	430 or more	431 or more	432 or more	433 or more	434 or more	435 or more	436 or more	437 or more	438 or more	439 or more	440 or more	441 or more	442 or more	443 or more	444 or more	445 or more	446 or more	447 or more	448 or more	449 or more	450 or more	451 or more	452 or more	453 or more	454 or more	455 or more	456 or more	457 or more	458 or more	459 or more	460 or more	461 or more	462 or more	463 or more	464 or more	465 or more	466 or more	467 or more	468 or more	469 or more	470 or more	471 or more	472 or more	473 or more	474 or more	475 or more	476 or more	477 or more	478 or more	479 or more	480 or more	481 or more	482 or more	483 or more	484 or more	485 or more	486 or more	487 or more	488 or more	489 or more	490 or more	491 or more	492 or more	493 or more	494 or more	495 or more	496 or more	497 or more	498 or more	499 or more	500 or more	501 or more	502 or more	503 or more	504 or more	505 or more	506 or more	507 or more	508 or more	509 or more	510 or more	511 or more	512 or more	513 or more	514 or more	515 or more	516 or more	517 or more	518 or more	519 or more	520 or more	521 or more	522 or more	523 or more	524 or more	525 or more	526 or more	527 or more	528 or more	529 or more	530 or more	531 or more	532 or more	533 or more	534 or more	535 or more	536 or more	537 or more	538 or more	539 or more	540 or more	541 or more	542 or more	543 or more	544 or more	545 or more	546 or more	547 or more	548 or more	549 or more	550 or more	551 or more	552 or more	553 or more	554 or more	555 or more	556 or more	557 or more	558 or more	559 or more	560 or more	561 or more	562 or more	563 or more	564 or more	565 or more	566 or more	567 or more	568 or more	569 or more	570 or more	571 or more	572 or more	573 or more	574 or more	575 or more	576 or more	577 or more	578 or more	579 or more	580 or more	581 or more	582 or more	583 or more	584 or more	585 or more	586 or more	587 or more	588 or more	589 or more	590 or more	591 or more	592 or more	593 or more	594 or more	595 or more	596 or more	597 or more	598 or more	599 or more	600 or more	601 or more	602 or more	603 or more	604 or more	605 or more	606 or more	607 or more	608 or more	609 or more	610 or more	611 or more	612 or more	613 or more	614 or more	615 or more	616 or more	617 or more	618 or more	619 or more	620 or more	621 or more	622 or more	623 or more	624 or more	625 or more	626 or more	627 or more	628 or more	629 or more	630 or more	631 or more	632 or more	633 or more	634 or more	635 or more	636 or more	637 or more	638 or more	639 or more	640 or more	641 or more	642 or more	643 or more	644 or more	645 or more	646 or more	647 or more	648 or more	649 or more	650 or more	651 or more	652 or 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more	736 or more	737 or more	738 or more	739 or more	740 or more	741 or more	742 or more	743 or more	744 or more	745 or more	746 or more	747 or more	748 or more	749 or more	750 or more	751 or more	752 or more	753 or more	754 or more	755 or more	756 or more	757 or more	758 or more	759 or more	760 or more	761 or more	762 or more	763 or more	764 or more	765 or more	766 or more	767 or more	768 or more	769 or more	770 or more	771 or more	772 or more	773 or more	774 or more	775 or more	776 or more	777 or more	778 or more	779 or more	780 or more	781 or more	782 or more	783 or more	784 or more	785 or more	786 or more	787 or more	788 or more	789 or more	790 or more	791 or more	792 or more	793 or more	794 or more	795 or more	796 or more	797 or more	798 or more	799 or more	800 or more	801 or more	802 or more	803 or more	804 or more	805 or more	806 or more	807 or more	808 or more	809 or more	810 or more	811 or more	812 or more	813 or more	814 or more	815 or more	816 or more	817 or more	818 or more	819 or more	820 or more	821 or more	822 or more	823 or more	824 or more	825 or more	826 or more	827 or more	828 or more	829 or more	830 or more	831 or more	832 or more	833 or more	834 or more	835 or more	836 or more	837 or more	838 or more	839 or more	840 or more	841 or more	842 or more	843 or more	844 or more	845 or more	846 or more	847 or more	848 or more	849 or more	850 or more	851 or more	852 or more	853 or more	854 or more	855 or more	856 or more	857 or more	858 or more	859 or more	860 or more	861 or more	862 or more	863 or more	864 or more	865 or more	866 or more	867 or more	868 or more	869 or more	870 or more	871 or more	872 or more	873 or more	874 or more	875 or more	876 or more	877 or more	878 or more	879 or more	880 or more	881 or more	882 or more	883 or more	884 or more	885 or more	886 or more	887 or more	888 or more	889 or more	890 or more	891 or more	892 or more	893 or more	894 or more	895 or more	896 or more	897 or more	898 or more	899 or more	900 or more	901 or more	902 or more	903 or more	904 or more	905 or more	906 or more	907 or more	908 or more	909 or more	910 or more	911 or more	912 or more	913 or more	914 or more	915 or more	916 or more	917 or more	918 or more	919 or more	920 or more	921 or more	922 or more	923 or more	924 or more	925 or more	926 or more	927 or more	928 or more	929 or more	930 or more	931 or more	932 or more	933 or more	934 or more	935 or more	936 or more	937 or more	938 or more	939 or more	940 or more	941 or more	942 or more	943 or more	944 or more	945 or more	946 or more	947 or more	948 or more	949 or more	950 or more	951 or more	952 or more	953 or more	954 or more	955 or more	956 or more	957 or more	958 or more	959 or more	960 or more	961 or more	962 or more	963 or more	964 or more	965 or more	966 or more	967 or more	968 or more	969 or more	970 or more	971 or more	972 or more	973 or more	974 or more	975 or more	976 or more	977 or more	978 or more	979 or more	980 or more	981 or more	982 or more	983 or more	984 or more	985 or more	986 or more	987 or more	988 or more	989 or more	990 or more	991 or more	992 or more	993 or more	994 or more	995 or more	996 or more	997 or more	998 or more	999 or more	1000 or more

Q3.14 Which magazine capacity do you use the most in your most recent MSR?

[illegible]

Q3.15 What type of stock is on your most recent MSR?

[illegible]

Q3.16 What type of usper receiver is on your most recent NSA7

[illegible]

Q3.17 What type of hand guard is on your most recent MSR?

Total		MSP's own		Range Membership		# times used last 12 months			Relief Airmen?		Law Enforcement or Military		Age		Income		Education		Marital Status		Children?	
				Member	Non-Member	4-11	12-20	21+	Relocator	Non-Relocator	Military / No. Military / Lt.	35-44	45-54	55-64	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35	65	\$45,000 to \$75,000	\$75,000 to \$115,000	Bachelor's or higher	Less than Bachelor's	Married	Single	On front line	No children in home
7203	2653	1453	2	364	369	30	30	244	285	285	285	35	35									

Q3.18 What type of finish color is your most recent MSR?

[illegible]

Q3.19 Is the barrel on your most recent MSR?

	# MSR's own		Range Membership	# Times used MSR last 12 months		Reload Ammo?	Law Enforcement or Military		Age	Income		Education	Marital Status	Children?
	1	2	3+	1 times or less	2-11	12-23	24+	Non Military / LE	Under	\$45,000 & under	\$45,001 to \$75,000	Bachelor's or higher	Married	No children in home
Total	7235	2550	3424	2550	1537	1042	536	3146	35	1303	1592	2973	3897	2385
Firearmed	676	526	626	626	359	64	626	626	35	626	626	626	626	626
Non-Firearmed / Crowded	235	188	256	256	266	266	266	266	271	286	256	256	266	266
Don't know	115	115	115	115	115	115	115	115	115	115	115	115	115	115
Other	2	2	2	2	2	2	2	2	2	2	2	2	2	2

Q3.20 Does the barrel on your most recent MSR have a?

	# MSR's own		Range Membership	# Times used MSR last 12 months		Reload Ammo?	Law Enforcement or Military		Age	Income		Education	Marital Status	Children?
	1	2	3+	1 times or less	2-11	12-23	24+	Non Military / LE	Under	\$45,000 & under	\$45,001 to \$75,000	Bachelor's or higher	Married	No children in home
Total	878	2474	3424	2474	1537	1042	536	3146	35	1303	1592	2973	3897	2385
Flash hole / Non-Remanent	458	386	458	458	458	458	458	458	458	458	458	458	458	458
Flash hole / Remanent	139	240	188	188	188	188	188	188	188	188	188	188	188	188
Muzzle brake / Non-Remanent	126	115	106	106	106	106	106	106	106	106	106	106	106	106
Muzzle brake / Remanent	85	94	76	76	76	76	76	76	76	76	76	76	76	76
Don't know	7	7	7	7	7	7	7	7	7	7	7	7	7	7
Other	124	114	149	149	149	149	149	149	149	149	149	149	149	149

Q3.21 What is the barrel length?

	# MSR's own		Range Membership	# Times used MSR last 12 months		Reload Ammo?	Law Enforcement or Military		Age	Income		Education	Marital Status	Children?
	1	2	3+	1 times or less	2-11	12-23	24+	Non Military / LE	Under	\$45,000 & under	\$45,001 to \$75,000	Bachelor's or higher	Married	No children in home
Total	7335	2688	3424	2688	1537	1042	536	3146	35	1303	1592	2973	3897	2385
11.9"	15	15	15	15	15	15	15	15	15	15	15	15	15	15
14.9"	46	46	46	46	46	46	46	46	46	46	46	46	46	46
18"	566	566	566	566	566	566	566	566	566	566	566	566	566	566
18"	126	126	126	126	126	126	126	126	126	126	126	126	126	126
20"	166	166	166	166	166	166	166	166	166	166	166	166	166	166
24"	66	66	66	66	66	66	66	66	66	66	66	66	66	66
Don't know	78	78	78	78	78	78	78	78	78	78	78	78	78	78
Other	28	28	28	28	28	28	28	28	28	28	28	28	28	28

Q3.22 Does your MSR operate on a?

	# MSR's own		Range Membership	# Times used MSR last 12 months		Reload Ammo?	Law Enforcement or Military		Age	Income		Education	Marital Status	Children?
	1	2	3+	1 times or less	2-11	12-23	24+	Non Military / LE	Under	\$45,000 & under	\$45,001 to \$75,000	Bachelor's or higher	Married	No children in home
Total	7335	2688	3424	2688	1537	1042	536	3146	35	1303	1592	2973	3897	2385
Direct gas impingement	826	826	826	826	826	826	826	826	826	826	826	826	826	826
Gas piston	166	166	166	166	166	166	166	166	166	166	166	166	166	166
Recall / Blow-back operated	66	66	66	66	66	66	66	66	66	66	66	66	66	66
Delayed toggle bolt reset	78	78	78	78	78	78	78	78	78	78	78	78	78	78
Don't know	28	28	28	28	28	28	28	28	28	28	28	28	28	28
Other	28	28	28	28	28	28	28	28	28	28	28	28	28	28

Q3.23 How likely are you to purchase a new MSR in the next 12 months? [average]

	# MSR's own		Range Membership	# Times used MSR last 12 months		Reload Ammo?	Law Enforcement or Military		Age	Income		Education	Marital Status	Children?
	1	2	3+	1 times or less	2-11	12-23	24+	Non Military / LE	Under	\$45,000 & under	\$45,001 to \$75,000	Bachelor's or higher	Married	No children in home
Total	1620	537	631	709	639	639	639	639	639	639	639	639	639	639
Mean	1620	537	631	709	639	639	639	639	639	639	639	639	639	639

Q4.1a Bipod

	# MSR's own		Range Membership	# Times used MSR last 12 months		Reload Ammo?	Law Enforcement or Military		Age	Income		Education	Marital Status	Children?
	1	2	3+	1 times or less	2-11	12-23	24+	Non Military / LE	Under	\$45,000 & under	\$45,001 to \$75,000	Bachelor's or higher	Married	No children in home
Total	7335	2688	3424	2688	1537	1042	536	3146	35	1303	1592	2973	3897	2385
Current use	314	314	314	314	314	314	314	314	314	314	314	314	314	314
Current use	314	314	314	314	314	314	314	314	314	314	314	314	314	314
Plan to buy in next 12 months	178	178	178	178	178	178	178	178	178	178	178	178	178	178
Don't own or plan to buy	327	438	326	256	336	266	266	266	336	326	326	326	326	326

Q4.1b Mounted Rifle Scope

	# MSR's own		Range Membership	# Times used MSR last 12 months		Reload Ammo?	Law Enforcement or Military		Age	Income		Education	Marital Status	Children?
	1	2	3+	1 times or less	2-11	12-23	24+	Non Military / LE	Under	\$45,000 & under	\$45,001 to \$75,000	Bachelor's or higher	Married	No children in home
Total	7011	2528	3424	2528	1527	1042	536	3146	35	1303	1592	2973	3897	2385
Current use	314	314	314	314	314	314	314	314	314	314	314	314	314	314
Plan to buy in next 12 months	178	178	178	178	178	178	178	178	178	178	178	178	178	178
Don't own or plan to buy	327	438	326	256	336	266	266	266	336	326	326	326	326	326

QL-1c Spotting Scope

	# MSR's own		Range Membership	# times used MSR last 12 months		Relief Annoy?	Law Enforcement or Military		Age	Income		Education	Marital Status		Children?
	1	2		3 times or less	4-11	12-23	24+	Relief Annoy?	Non Military / L.E.	35-44	45-54	55-64	65+	66+	
Total	1	2	3+	3 times or less	4-11	12-23	24+	Relief Annoy?	Non Military / L.E.	35-44	45-54	55-64	65+	66+	No children in home
Currently own	6552	2353	3472	2135	3336	2715	1743	925	864	2823	3431	1382	444	1382	2715
Plan to buy in next 12 mths.	526	426	534	488	514	606	606	606	606	606	606	606	606	606	606
Don't own or plan to buy	314	181	156	174	174	156	174	156	174	156	174	156	174	156	174

QL-1d Range Finder

	# MSR's own			Range Membership		# times used MSR last 12 months		Relief Annoy?		Law Enforcement or Military		Age		Income		Education		Marital Status		Children?									
	1	2	3+	Member	Non-Member	3 times or less	4-11	12-23	24+	Reloader	Non-Reloader	Military / L.E.	Non Military / L.E.	35-44	45-54	55-64	65+	65,000.00 or under	\$50,000.01 to \$75,000.00		\$75,000.01 to \$100,000.00	\$100,000.01 to \$1,000,000.00	Less Than Bachelor's	Bachelor's or Higher	Married	Not Married	Children in home	No children in home	
Total	1	2	3+	3223	3028	2653	1665	864	862	2722	3317	3583	1271	434	1598	1863	1384	1384	1384	1384	1384	1384	1384	1384	1384	1384	1384	1384	1384
Currently own	6318	2291	3443	2030	3223	2653	1665	864	862	2722	3317	3583	1271	434	1598	1863	1384	1384	1384	1384	1384	1384	1384	1384	1384	1384	1384	1384	1384
Plan to buy in next 12 mths.	526	426	534	488	514	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606
Don't own or plan to buy	314	181	156	174	174	156	174	156	174	156	174	156	174	156	174	156	174	156	174	156	174	156	174	156	174	156	174	156	174

QL-1e Rifle Sling

	# MSR's own			Range Membership	# times used MSR last 12 months				Relief Annoy?	Law Enforcement or Military		Age	Income					Education	Marital Status		Children?	
	1	2	3+		3 times or less	4-11	12-23	24+		Non-Reliever	Military / L.E.		Under 35	35-44	45-54	\$40,000 to under \$70,000	\$70,000 to \$120,000		\$120,000+	Less than a year		Married
Total	1	2	3+	Non-Member	0	4-11	12-23	24+	Reliever	Military / L.E.	Under 35	35-44	45-54	\$40,000 to under \$70,000	\$70,000 to \$120,000	\$120,000+	Less than a year	Married	Not Married	Children in home	No children in home	
Currently own	7027	2566	2265	3463	2021	2828	1620	922	3028	3716	3376	2369	1788	1874	1509	1874	1577	3809	1095	1846	4211	4211
Plan to buy in next 12 mths.	8134	7316	8276	8299	8276	7884	8678	8974	8576	7884	8476	7884	8134	8276	8299	8276	7996	8296	8134	8134	8134	8134
Don't own or plan to buy	1276	1776	1276	1336	1336	1336	996	796	1776	1436	1266	1236	1236	1236	1236	1236	1236	1236	1236	1236	1236	1236
Don't own or plan to buy	776	1266	676	686	886	756	866	456	596	606	886	676	756	886	596	796	676	676	756	676	776	776

QL-1f Tactical Flashlight

	# MSR's own			Range Membership	# times used MSR last 12 months	Relief Annoy?	Law Enforcement or Military	Age			Income		Education	Marital Status		Children?								
	1	2	3+					Under 35	35-44	45-54	55-64	65+		\$45,000 & under	\$45,001 to \$75,000		\$75,001 to \$110,000	\$110,001+	Less than high school	Married	Not married	No children in home		
Total	1	2	3+	3 times or less	4-11	12-23	24+	Relief Annoy?	Non-Buddhist	Military / L.E.	Under 35	35-44	45-54	55-64	65+	\$45,000 & under	\$45,001 to \$75,000	\$75,001 to \$110,000	\$110,001+	Less than high school	Married	Not married	No children in home	
Currently own	6061	2197	3437	2107	3353	2776	1743	925	864	2823	3431	1382	444	1382	2715	156	174	156	174	156	174	156	174	156
Plan to buy in next 12 mths.	526	426	534	488	514	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606	606
Don't own or plan to buy	314	181	156	174	174	156	174	156	174	156	174	156	174	156	174	156	174	156	174	156	174	156	174	156

QL-1g Tactical Apparel

	# MSR's own			Range Membership	# times used MSR last 12 months				Relief Annoy?	Law Enforcement or Military		Age	Income					Education	Marital Status		Children?				
	1	2	3+		3 times or less	4-11	12-23	24+		Re-caller	Non-Recaller		Military / L.E.	35-44	45-54	55-64	65+		\$45,000 to under \$75,000	\$75,001 to \$100,000		\$100,001+	Less than Bachelor's	Married	Not Married
Total	6308	2297	2417	2035	3184	3595	2631	1663	897	854	2716	3169	3169	2585	1308	1593	1705	1672	1354	2631	4488	2704	2838	3526	3526
Currently own	379	276	366	505	4038	3596	3679	3399	4216	4876	4836	3996	4836	4254	3798	4316	3896	4816	4316	3798	3884	3798	3884	4626	4626
Plan to buy in next 12 mths.	2198	1386	1246	1296	1028	1206	1296	1296	1136	1296	916	1336	1296	1336	1296	1296	1296	1296	1116	1116	1116	1116	1236	1236	1116
Don't own or plan to buy	1306	606	526	4116	1026	5296	5496	4886	4216	4336	4836	4836	4836	4836	4836	4836	4836	5036	4936	4836	5116	5296	4996	4886	568

QL-1h Night Vision

	# MSR's own			Range Membership	# times used MSR last 12 months				Relief Annoy?	Law Enforcement or Military		Age	Income		Education	Marital Status		Children?					
	1	2	3+		3 times or less	4-11	12-23	24+		Non Military / L.E.	35-44		45-54	55-64		65+	Less than Bachelor's or higher		Married	Not Married	Ch. in home	No children in home	
Total	1006	2265	1589	3112	2555	1642	824	838	3630	3308	2656	3532	1264	1378	1139	1668	1625	1338	\$110,001 to \$150,000	\$150,001 to \$200,000	2601	3472	3472
Currently own	1098	64	156	1036	1076	96	1236	1356	1276	996	1236	956	776	1026	1236	1136	1136	1136	1136	1076	3076	1026	1026
Plan to buy in next 12 mths.	2596	1536	2336	1836	1596	1596	2256	2336	1596	1596	1596	1596	2076	2076	1596	1596	1596	1596	1596	1596	1776	2136	1596
Don't own or plan to buy	7236	836	616	7236	7236	7236	7236	6836	7036	7236	6936	6936	7336	7336	7336	7336	7336	7336	7336	7336	7036	7336	7336

QL-1i Vertical Foregrip

	# MSR's own			Range Membership	# times used MSR last 12 months				Relief Annoy?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
	1	2	3+		3 times or less	4-11	12-23	24+		Relief Annoy?	Non-Responder	Military / L.E.	Under 35	35-44	45-54	55-64	65+	\$45,000 or less	\$46,001 to \$75,000		\$75,001 to \$100,000	\$100,001+	Less than Bachelor's	Bachelor's	Married	Not Married	Children in home
Total	4073	2352	1442	2109	3262	3183	2099	1724	956	871	2733	3457	3863	1335	1485	1641	1470	398	1743	1743	1338	2185	4346	4641	4728	3529	3529
Currently own	4073	2796	4026	5556	4296	3768	3738	4356	4336	4959	3816	4336	4336	4336	4336	3888	3470	2069	3795	3996	4336	4526	4346	4641	4728	4336	3996
Plan to buy in next 12 mths.	1336	1796	1696	1156	1946	1536	1536	1456	1256	1236	1336	1636	1636	1796	1796	1456	1296	2386	1795	1536	1456	1466	1456	1636	1636	1596	1466
Don't own or plan to buy	4336	5656	3786	4886	4846	4736	4846	5256	4336	3886	3526	4226	4526	3396	4488	5696	6396	4686	4796	4536	4336	4796	4456	4696	4626	4336	4796

QL-1j Laser Optic

	# MSR's own			Range Membership	# times used MSR last 12 months				Relief Annoy?	Law Enforcement or Military		Age	Income				Education	Marital Status		Children?				
	1	2	3+		3 times or less	4-11	12-23	24+		Relief Annoy?	Non-Releaser		Military / L.E.	Under 35	35-44	45-54		55-64	65+		Less than Bachelor's	Married	Not Married	Children in home
Total	1	2	3+	3 times or less	4-11	12-23	24+	Relief Annoy?	Non-Releaser	Military / L.E.	Under 35	35-44	45-54	55-64	65+	\$45,000 or under	\$45,000 to \$75,000	\$75,000 to \$120,000	\$120,000+	Less than Bachelor's	Married	Not Married	Children in home	
Currently own	6061	2123	2259	2037	2697	898	854	2681	3399	2721	3638	3298	2452	1915	1476	388	1347	1692	1382	2441	4558	1706	2875	3586
Plan to buy in next 12 mths.	264	176	269	278	2436	245	329	329	2796	2634	2626	2456	2456	2884	2426	2336	2426	2884	3026	2426	2761	2634	2626	2936
Don't own or plan to buy	1734	1856	2098	1778	1856	1286	1355	1856	1796	1856	1286	1634	1778	1574	1395	1354	1314	1276	1826	1634	3399	1778	1796	1856
	5776	8536	5378	5698	5584	5796	4934	5796	5684	5796	5796	6134	5878	5378	5339	6134	5996	5584	5134	6026	5776	5796	5796	5776

QL-14 Railed Handgun

Total	# MGR's own			Range Membership 3 times or less	# times used MSR last 12 months				Reload Ammo? Reloader / Non-Reloader	Law Enforcement or Military		Age	Income		Education	Marital Status		Children?						
	1	2	3+		3 times or less	4-11	12-23	24+		Under 35	35-44		45-54	55-64		\$45,000 & under	\$45,001 to \$110,000		\$110,001 to \$175,000	Lost (than Bachelor's)	Married	Not Married	Children in home	No children in home
65,659	27,676	14,557	2,341	3,350	2,716	17,400	9,931	892	2,789	3,493	3,728	13,377	2,825	3,493	415	11,941	17,741	14,121	2,722	35,131	4,702	17,551	27,423	3,860
5,136	3,896	3,134	635	4,236	3,064	48,564	5,881	4,691	5,476	4,691	5,881	5,881	4,691	5,881	4,691	5,881	4,691	5,881	4,691	5,881	4,691	5,881	4,691	5,881
15,564	12,841	18,741	3,291	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746
34%	44%	33%	23%	35%	31%	39%	28%	25%	30%	34%	34%	24%	28%	37%	42%	48%	44%	35%	37%	32%	30%	38%	33%	35%
Don't own or plan to buy																								

QL-17 Stock Upgrade

	# MGR's own				Range Membership	# times used MSR last 12 months	Reload Ammo?	Law Enforcement or Military		Age	Income		Education	Marital Status		Children?								
	1	2	3+	Non-Member				Member	31 mos or less		4-11	12-23		24+	Reloader		Non-Reloader	Under \$45,000	\$45,001 to \$75,001	\$75,001 to \$110,000	\$110,001+	Less than Bachelor's	Bachelor's or higher	Not Married
Total	66,442	23,325	14,432	2,105	32,448	31,688	2,883	17,121	9,920	3,852	2,734	3,421	3,703	3,124	3,819	3,184	17,118	17,111	13,902	3,444	4,598	4,739	2,706	3,611
Currently own	39,964	22,566	3,885	5,791	4,236	3,796	4,116	3,266	4,336	5,114	4,279	3,996	4,136	3,666	3,834	2,631	3,796	4,096	4,296	3,796	4,136	4,739	4,526	5,996
Plan to buy in next 12 mos.	15,564	12,841	3,291	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746	1,746
Don't own or plan to buy	45,564	5,959	4,236	2,035	24,438	27,876	4,066	4,434	3,884	3,596	4,096	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434	4,434

QL-18 Hard Carry Knife Case

Total	# MGR's own			Range Memberships	# times used MSR last 12 months	Reload Ammo?	Law Enforcement or Military		Age	Income		Education	Marital Status		Children?																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										
	1	2	3+				Non-Military / LE	Military / LE		Under 35	35-44		45-54	55-64		65+	Less than Bachelor's	Bachelor's or higher	Not Married	Married	No children in home	Children in home																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
67,119	24,435	13,118	2,183	3,248	4,111	12,231	244	Recreational	Non-Recreational	35	\$45,001 to \$75,001	\$75,001 to \$100,001	2,740	3,771	2,740	3,748	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6,256	6

QL-19 Soft Carrying Case

	# MGR's own			Range Membership		# times used MSR last 12 months				Reload Ammo?		Law Enforcement or Military		Age			Income		Education		Marital Status		Children?	
	1	2	3+	None	Minimal	3 times or less	4-11	12-23	24+	Reloader	Non-Reloader	MT/PT/LE	Not MT/PT/LE	Under 35	35-44	45-54	55-64	65+	Bachelor's or higher	Below Bachelor's	Less than Married	Married	Not Children in home	No children in home
Total	15,513	21,848	17,726	1,746	1,746	2,883	2,883	17,121	9,921	3,856	3,856	2,883	2,883	3,493	3,493	3,728	448	448	1,803	2,777	3,810	4,813	1,823	3,786
70%	10,859	15,293	12,408	1,223	1,223	2,019	2,019	12,168	6,740	2,705	2,705	2,019	2,019	2,445	2,445	2,560	315	315	1,266	1,933	2,666	3,396	1,266	2,726
70%	6,251	8,556	6,318	678	678	1,864	1,864	10,953	5,180	1,551	1,551	1,864	1,864	2,276	2,276	2,378	286	286	1,066	1,566	2,076	2,596	1,066	2,076
Currently own	12,841	18,741	15,564	1,174	1,174	2,019	2,019	12,168	6,740	1,551	1,551	1,174	1,174	1,226	1,226	1,378	166	166	1,066	1,566	2,076	2,596	1,066	2,076
Shots to base in next 12 mths.	25,726	35,131	27,423	3,291	3,291	5,131	5,131	30,826	16,451	2,705	2,705	3,291	3,291	3,856	3,856	4,008	496	496	2,076	3,076	4,076	5,076	2,076	4,076
Shots to base in next 12 mths. (Shots to base on day 10)	25,726	35,131	27,423	3,291	3,291	5,131	5,131	30,826	16,451	2,705	2,705	3,291	3,291	3,856	3,856	4,008	496	496	2,076	3,076	4,076	5,076	2,076	4,076

QL-20 Trigger Upgrade

	# MGR's own			Range Membership	# times used MSR last 12 months	Reload Ammo?	Law Enforcement or Military		Age	Income	Education	Marital Status	Children?								
	1	2	3+				Non-Military/L.L.	Military/L.L.						35-44	45-54	55-64	65+				
Total:	65,654	23,581	14,653	21,019	3,712	2,744	3,589	2,782	3,133	16,669	3,589	3,662	5,217	6,945	\$45,000 to \$55,000	15,000 to \$20,000	13,377	14,683	13,377	37,741	30,741
Currently own:	33%	33%	36%	38%	25%	25%	34%	28%	34%	35%	35%	35%	32%	34%	35%	35%	32%	32%	33%	33%	36%
Do not own:	67%	67%	64%	62%	75%	75%	66%	72%	66%	65%	65%	65%	68%	66%	65%	65%	68%	68%	67%	67%	64%
Do not buy in case 12 min.	24%	24%	24%	27%	46%	43%	31%	44%	44%	24%	24%	24%	24%	24%	24%	24%	24%	24%	24%	24%	24%
Do not buy in case 12 min.	37%	37%	37%	38%	46%	43%	31%	44%	44%	24%	24%	24%	24%	24%	24%	24%	24%	24%	24%	24%	24%
Do not buy in case 12 min.	43%	43%	43%	43%	46%	43%	31%	44%	44%	24%	24%	24%	24%	24%	24%	24%	24%	24%	24%	24%	24%

QL-21 Backup Iron Sights

	Totals	# MGR's own			Range Membership		# times used MSR last 12 months		Reload Ammo?		Law Enforcement or Military		Age		Income		Education		Marital Status		Children?				
		1	2	3+	Non-Member	Member	4-11	12-23	24+	Reloader	Non-Reloader	Military / L.E.	Non-Military / L.E.	Under 35	35-44	45-54	55-64	65+	Bachelor's or higher	Less than Bachelor's	Not Married	Married	No children in home	Children in home	
	65,652	23,365	14,732	2,142	3,348	3,357	2,743	1,742	531	879	2,795	4,482	28,737	3,744	3,339	1,658	3,077	1,492	408	17,935	17,935	3,411	4,703	17,542	3,852
	59%	49%	60%	72%	67%	56%	61%	54%	64%	67%	61%	87%	80%	59%	58%	47%	58%	47%	58%	62%	63%	59%	50%	62%	58%
	15%	12%	13%	23%	9%	11%	10%	9%	9%	9%	10%	10%	10%	11%	11%	11%	10%	10%	10%	10%	10%	10%	10%	10%	10%
	31%	41%	29%	20%	36%	30%	34%	24%	19%	26%	31%	37%	23%	27%	36%	41%	47%	43%	34%	37%	32%	30%	35%	33%	35%

QL-22 Sound Suppressor

Total	# MSR's own			Range Membership		# times used MSR last 12 months				Reload Ammo?		Law Enforcement or Military		Age		Income		Education		Marital Status		Children?			
	1	2	3+	Member	Non-Member	3 times or less	4-11	12-23	24+	Reloader	Non-Reloader	Police / L.E.	Military / U.S. Marine	35-44	45-54	55-64	\$45,000 to \$75,000	\$75,000 to \$110,000	\$110,001+	Bachelor's or higher	less than Bachelor's	Married	Not Married	No children in home	Children in home
61,685	22,625	13,385	1,990	3,115	3,047	25,71	10,139	8,721	860	2,517	3,297	2,644	3,533	2,441	13,57	13,83	3,76	1,143	13,338	2,602	2,429	44,32	1,667	2,618	34,520
66	291	381	139	374	356	794	581	481	109	791	581	791	581	791	681	581	681	581	681	581	681	681	791	681	1,051
19%	2,381	2,051	2,051	2,031	1,851	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051	2,051
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Plan to buy in next 3,000 mths.																									

QL-23 Laser Designator

Total	# MSR's own			Range Membership	# times used MSR last 12 months				Reload Ammo?		Law Enforcement or Military		Age		Income					Education	Marital Status		Children?				
	1	2	3+		3 times or less	4-11	12-23	24+	Re-loader	Non-Re-loader	Military / L.E.	Non Military / L.E.	Under 35	35-44	45-54	55-64	65+	\$45,001 to under \$75,000	\$75,001 to \$100,000		\$100,001 to \$150,000	Bachelor's or higher	Less than Bachelor's	Married	Not Married	No children in home	Children in home
62,142	2,286	14,027	139,575	3,127	25,852	16,457	87,781	843	26,048	33,553	2,654	1,268	34,338	15,562	34,113	37,721	1,445	16,584	13,948	2,595	33,317	44,433	20,778	26,321	24,802	34,840	
20%	7%	56%	15%	12%	9%	9%	12%	1,056	3,254	2,175	1,326	1,026	9%	21%	23%	20%	9%	23%	23%	9%	21%	10%	10%	11%	11%	11%	
20%	8%	12%	56%	20%	30%	20%	18%	1,356	3,584	2,082	1,326	1,026	9%	21%	23%	20%	9%	23%	23%	9%	21%	10%	10%	11%	11%	11%	
Pan to buy in next 12 mths.																											
Pan to buy in next 12 mths.																											

[illegible][illegible]

Q6-6 Did you shoot your MSR more, less, about the same in the last 12 months compared to the year before?										Income		Education		Marital Status		Children?													
										\$45,000 to \$75,000	\$75,001 to \$110,000	Bachelor's or higher	Less than Bachelor's	Married	Not Married	Children in home	No children in home												
If MSR's own										45-56	57-66	40-56	45-56	35-44	45-56	35-44	45-56												
Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
												Not a Recaller	Military / L.E.	Under 35	35-44	45-56	57-66	65+	Less than \$45,000	\$45,001 to \$75,000	Bachelor's or higher	Less than Bachelor's	Married	Not Married	Children in home	No children in home			
Total										2	12721	244	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
MSR's own										1	6111	853	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
												Not a Recaller	Military / L.E.	Under 35	35-44	45-56	57-66	65+	Less than \$45,000	\$45,001 to \$75,000	Bachelor's or higher	Less than Bachelor's	Married	Not Married	Children in home	No children in home			
Total										2	12721	244	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
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Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
												Not a Recaller	Military / L.E.	Under 35	35-44	45-56	57-66	65+	Less than \$45,000	\$45,001 to \$75,000	Bachelor's or higher	Less than Bachelor's	Married	Not Married	Children in home	No children in home			
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Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
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Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
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Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
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Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
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Total										2	12721	244	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
MSR's own										1	6111	853	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
												Not a Recaller	Military / L.E.	Under 35	35-44	45-56	57-66	65+	Less than \$45,000	\$45,001 to \$75,000	Bachelor's or higher	Less than Bachelor's	Married	Not Married	Children in home	No children in home			
Total										2	12721	244	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
MSR's own										1	6111	853	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
												Not a Recaller	Military / L.E.	Under 35	35-44	45-56	57-66	65+	Less than \$45,000	\$45,001 to \$75,000	Bachelor's or higher	Less than Bachelor's	Married	Not Married	Children in home	No children in home			
Total										2	12721	244	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
MSR's own										1	6111	853	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
												Not a Recaller	Military / L.E.	Under 35	35-44	45-56	57-66	65+	Less than \$45,000	\$45,001 to \$75,000	Bachelor's or higher	Less than Bachelor's	Married	Not Married	Children in home	No children in home			
Total										2	12721	244	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
MSR's own										1	6111	853	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
												Not a Recaller	Military / L.E.	Under 35	35-44	45-56	57-66	65+	Less than \$45,000	\$45,001 to \$75,000	Bachelor's or higher	Less than Bachelor's	Married	Not Married	Children in home	No children in home			
Total										2	12721	244	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
MSR's own										1	6111	853	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
												Not a Recaller	Military / L.E.	Under 35	35-44	45-56	57-66	65+	Less than \$45,000	\$45,001 to \$75,000	Bachelor's or higher	Less than Bachelor's	Married	Not Married	Children in home	No children in home			
Total										2	12721	244	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
MSR's own										1	6111	853	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
												Not a Recaller	Military / L.E.	Under 35	35-44	45-56	57-66	65+	Less than \$45,000	\$45,001 to \$75,000	Bachelor's or higher	Less than Bachelor's	Married	Not Married	Children in home	No children in home			
Total										2	12721	244	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
MSR's own										1	6111	853	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
Range Membership										# times used MSR last 12 months	Rebbed Ammo?	Law Enforcement or Military		Age		Income		Education		Marital Status		Children?							
												Not a Recaller	Military / L.E.	Under 35	35-44	45-56	57-66	65+	Less than \$45,000	\$45,001 to \$75,000	Bachelor's or higher	Less than Bachelor's	Married	Not Married	Children in home	No children in home			
Total										2	12721	244	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230	3485	1374	1527	3767	5017	3581	2958	3939
MSR's own										1	6111	853	Rebcaller	3036	3542	3324	3532	1769	2666	483	1230								

Q5.5 In the last 12 months where did you shoot your M&P?										Income		Education		Marital Status		Children?	
										\$43,000 to \$50,000	\$51,000 to \$75,000	Barber's or higher	Less than Barber's	Married	Not Married	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No children in home
Total										5901	1883	2892	3795	5302	12314	2221	4478
Range Membership										3	3	3	3	3	3	3	3
# M&P's own										3	3	3	3	3	3	3	3
It times used M&P last 12 months										24	24	24	24	24	24	24	24
Re-load Ammo?										Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load	Re-load	Non-Re-load
Law Enforcement or Military										Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.	Military / L.E.
Age										45-54	55-64	65+	65+	65+	65+	65+	65+
Income										\$43,000 to \$50,000	\$51,000 to \$75,000	\$76,000 to \$100,000	\$101,000 to \$125,000	\$126,000 to \$150,000	\$151,000 to \$175,000	\$176,000 to \$200,000	\$201,000 to \$225,000
Marital Status										Married	Not Married	Married	Not Married	Married	Not Married	Married	Not Married
Children?										Ch. died in home	No children in home	Ch. died in home	No children in home	Ch. died in home	No		

Q6. What is the % breakdown of the ammunition have you used in the last 12 months for your MOS?																								
If MOS is own				Range Membership		If times used MSR last 12 months		Reload Ammo?		Law Enforcement or Military		Age		Income		Education		Marital Status		Children?				
1	2	3	4	Non-Member	Member	1-3 times	4-11	12-23	24+	Recreational	Non-Recreational	Military (Full Time)	18-24	25-34	35-49	50-64	65+	Bachelor's or higher	Less than Bachelor's	Married	Not Married	Children in home	No children in home	
42.2%	36.6%	34.7%	32.2%	43.5%	40.0%	43.5%	25.8%	25.8%	25.8%	25.8%	25.8%	25.8%	25.8%	25.8%	25.8%	25.8%	25.8%	44.5%	40.5%	41.3%	44.2%	45.4%	41.3%	41.3%

Q5.14 What distance do you generally hunt or target shoot at with your primary MSR?

Q5.15 When you go target shooting with your MSR do you generally go shooting?:

Q5.16 Have you been able to shoot your MSG as often as you would like in the last 12 months?

Q5.37 How important are each of the following in preventing you from shooting your MSR more often? (average)

Q3.37 How important are each of the following in preventing you from shooting your MSR more often? (average)										Range Membership		If NSR's own		If times used MSR last 12 months		Reload Ammo?		Law Enforcement or Military		Age		Income		Education		Marital Status		Children?		
		Non-Member		Member		Total		Times used		Times used		Times used		Times used		Times used		Times used		Times used		Times used		Times used		Times used		Times used		
		3 times or less		4-6 times		7-10 times		11-15 times		16-20 times		21-25 times		26-30 times		31-35 times		36-40 times		41-45 times		46-50 times		51-55 times		56-60 times		61-65 times		
Not enough free time	7.17	2.82	2.83	2.82	2.83	2.82	2.83	2.82	2.83	2.82	2.83	2.82	2.83	2.82	2.83	2.82	2.83	2.82	2.83	2.82	2.83	2.82	2.83	2.82	2.83	2.82	2.83	2.82	2.83	
Cost of ammunition	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	
Insurance must cover for valuable places to hunt	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	5.29	5.28	
Cost of transportation	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68
Cost of food	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68
Cost of gas	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68
Cost of gear	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68	4.67	4.68
Cost of range fees	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36
Cost of gear	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36
Cost of gear	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36
Cost of gear	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36	3.35	3.36
Cost of gear	3.35	3.36	3.35	3.36	3.35	3.36	3.35																							

		# MSP's own		Range Membership		# times used NOR last 22 months	Relaid Armer?		Law Enforcement or Military		Age		Income		Education	Married Status	Children?
		1	2	3	4	5 times or more	Relaid	Armer?	Police	Non-Police	Age	Under 35	35-54	\$44,000 to \$75,000	Below or higher	Married	Children of home
Total		2	2	2	2	2146	2146	2146	2146	2146	45-56	1889	1278	\$54,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
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7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
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7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
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7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
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7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
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7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
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7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146
7084	2641	1013	2242	4711	12723	2146	1011	4052	1889	4052	1889	45-56	55-64	544,000 to \$75,000	\$10,000 to \$10,000	2146	2146

[illegible]

	# MSB's own				Range Membership		If times used MSR last 12 months		Releaser Anno?		Law Enforcement or Military		Age		Income		Education		Marital Status		Children?		
	Total	1	2	3+	Member	Non-Member	0-1 times	2-12 times	24+	Releaser	Non-Releaser	MSR/any L.E.	Not in Army/L.E.	Under 35	35-44	\$4,000 or under	\$4,001 to \$10,000	High School or higher	Married	Divorced		Widowed	Single
MSB's Education	7319	2824	1363	2324	3077	2853	1597	1346	943	2110	2818	3192	412	248	1189	58	1779	58	27,000	9374	376	38	412
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
MSB's Education	1%	2%	2%	2%	6%	6%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
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AGE 12 BH income										if MGF's own										Range Membership				3 times over 12 months				Rebad Armo?				Law Enforcement or Military				Age				Income				Education				Married Status				Children?																																																									
										1				2				3+				Member				less				Rebader				Military / L.E.				New Military / L.E.				35-44				45-54				55-64				95+				\$43,000 & under				\$45,001 to \$75,001				\$75,001 to \$110,001				\$110,001 to \$150,001				Bachelor's or higher				Married				On own or home				No children in home																							
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Q6.11 Do you have any children living with you?

[illegible]



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PROMOTE

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EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

JUNE SHEW, et al,)	
Plaintiffs,)	
)	
-against-)	Civil No. 3:13-cv-739-AVC
)	
DANNEL P. MALLOY, et al,)	
)	
Defendants.)	

DECLARATION OF GUY ROSSI

I, Guy Rossi, do hereby swear or affirm:

I offer this declaration in support of a motion made by plaintiffs in the above-referenced action that seeks a preliminary injunction enjoining the enforcement of the Act Concerning Gun Violence Prevention and Children's Safety ("the Act"). This declaration is based upon my review of the Act, the Complaint and First Amended Complaint filed by the plaintiffs herein, and my review of the plaintiff's motion for preliminary injunction. It is also based upon my thirty (30) years of experience in instructing and training law enforcement recruits, instructors, and supervisors.

I offer the following opinions under the penalties of perjury, and to a reasonable degree of firearms safety, firearms operations, and firearms training certainty.

I. EXPERIENCE & TRAINING

I am a retired Police Sergeant of the Rochester, New York Police Department. During my years on the force I specialized in patrol, recruit, field training, firearms, and defensive tactics instruction. I have been a nationally recognized law enforcement trainer since 1982. My teachings in officer survival skills have been published in over two hundred (200) magazine articles and book chapters.

I have developed and trained recruits, instructors, and supervisors in firearms, defensive tactics, and justified use of force. I have developed and instructed hundreds of cognitive and psychomotor skill related programs, including New York State Penal Law Article 35 – Defense of Justification, Liability Issues for Police Supervisors, Firearms and Defensive Tactic Instructor Courses, Multimedia for Law Enforcement Trainers, and, most recently, a web-based learning program in Community College Citizen Preparedness for FEMA. The curriculum and training which I developed and instructed have been recognized on an international basis, and are based upon my career employment as a police officer and my extensive knowledge of firearms (including those characterized as "assault weapons" by Connecticut law). My declaration is also based on my real life experiences with firearms and application of the use of force during training, on the street as a police officer, a law abiding citizen and homeowner.

I have a Master's Degree in Adult Education – Instructional Design. I am a charter and advisory board member of the International Law Enforcement and Educators Trainers Association (ILEETA), as well as the (former) Editor of *The ILEETA Review*. Significant

certifications/credentials of mine include NYS Division of Criminal Justice Services Master Instructor in General Topics, Defensive Tactics, Firearms, Field Training and Aerosol Subject Restraint, Law Enforcement Accreditation Manager, Security Guard Instructor, Safariland Master Baton and Defensive Tactic Instructor, Taser Instructor, Force Science Analyst Certification and Independent Consultant/Trainer in Verbal Defense and Influence.

As a result of the aforementioned education, training and experience I have developed an extensive knowledge of firearms, their various features, their safe operation, and their use for self defense. I have been qualified as an expert witness on the use of force in local, state and federal courts.

II. THE ACT'S RESTRICTIONS ON MAGAZINES & ROUNDS

The Act bans standard magazines that are in common use by classifying them as "large capacity magazines." These so-called "large capacity magazines" are generally defined by the Act to include devices "that ha[ve] the capacity of, or can be readily restored or converted to accept, more than 10 rounds of ammunition." CONN. GEN. STAT. § 53-202p(a)(1).

The Act prohibits possession of a magazine capable of holding more than ten rounds. However, on a nationwide basis most pistols are manufactured with magazines holding ten to 17 rounds. Many popular rifles are manufactured with magazines holding twenty or thirty rounds. These pistols, rifles and shotguns are sold to civilians and are in common use for self defense, hunting, and nationally established sporting competitions. Some of these competitions are designed specifically for pistols, rifles and shotguns capable of holding a greater number of rounds than the Act permits.

The Act requires those who wish to keep their magazines (other than those eligible to be declared) to somehow alter them so that they cannot be readily restored or converted to hold more than ten rounds. However, such alteration or conversion requires engineering knowhow, parts, and equipment that are beyond the capacity of an ordinary, law-abiding gun owner. No such products or services are, to my knowledge, on the market. Such *ad hoc* conversions do not foster the shooter's faith in the consistent feeding capability as those tested by reliable manufacturers of firearms. Law abiding firearm owners do not possess the skill of a certified gunsmith to alter a magazine that may fail during a life or death encounter. Having cleaned many pistol magazines during my experience, the mere erroneous act of reversing a magazine spring could disastrously effect the functioning ability of a magazine, let alone any alteration to a magazine or spring. Indeed, as with firearms, magazine model and design types number in the hundreds or thousands.

III. THE ACT'S RESTRICTIONS ON STOCKS & GRIPS OF PISTOLS, RIFLES & SHOTGUNS

The Act significantly redefines the term "assault weapon" so as to criminalize features that are commonly found on rifles, pistols and shotguns. Transfer or possession of an "assault weapon" is a felony. Under the Act, the presence of the following features qualifies a firearm as an "assault weapon":

Rifles

- i. A semiautomatic, centerfire rifle that has an ability to accept a detachable magazine and has at least one of the following:
 - I. A folding or telescoping stock;
 - II. Any grip of the weapon, including a pistol grip, a thumbhole stock, or any other stock, the use of which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing;¹
 - III. A forward pistol grip;
 -
- ii. A semiautomatic, centerfire rifle that has a fixed magazine with the ability to accept more than ten rounds of ammunition; or
- iii. A semiautomatic, centerfire rifle that has an overall length of less than thirty inches....

Pistols

- iv. A semiautomatic pistol that has the ability to accept a detachable magazine and has at least one of the following:
 - I. An ability to accept a detachable magazine that attaches at some location outside the pistol grip; [or]
 -
 - V. A semiautomatic pistol with a fixed magazine that has the ability to accept more than ten rounds.

Shotguns

- vi. A semiautomatic shotgun that has both of the following:
 - I. A folding or telescoping stock; and

¹ It is important to note that, for both rifles and shotguns, the area below the portion of a stock that the trigger finger hand holds while firing is commonly called a “grip.” Technically, the description of “any grip of the weapon, including a pistol grip, a thumbhole stock, or any other stock, the use of which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing” can apply to any rifle/shotgun without a pistol grip.

- II. Any grip of the weapon, including a pistol grip, a thumbhole stock, or any other stock, the use of which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing;² or
- vii. A semiautomatic shotgun that has the ability to accept a detachable magazine.

See CONN. GEN. STAT. § 53-202a(1)(E).

The above definitions are restricted to “centerfire” firearms. An amendment to the Act would define “assault weapon” also to include rimfire firearms if they have two of the above listed features. § 3 of S.B. 1094. Firearms in .22 caliber rimfire are among the most popular nationwide and are primarily used for target shooting and hunting.

Restricting pistols, rifles and shotguns on the basis of the above features is not rationally related to the safety and goals that the statute purports to achieve. An explanation of these features illustrates the point.

Telescoping Stocks. A “telescoping stock” allows the length of the stock of a rifle or shotgun to be shortened or lengthened consistent with the length of the person’s arms, so that the stock fits comfortably against the shoulder and the rear hand holds the grip and controls the trigger properly. It simply allows the gun to fit the person’s physique correctly, literally in the same manner as one selects the right size of shoe to wear. For example, a telescoping stock allows a hunter to change the length of the stock depending on the clothing appropriate for the weather encountered. Shooting outdoors in fall and winter requires heavy clothing and a shooting vest, thus requiring shortening of the stock so that the firearm can be fitted for proper access to the trigger. The rifle or shotgun may be adjusted to fit the different sizes of several people in a family or home. A telescoping stock does not make a firearm more powerful or more deadly.

The irrationality of the Act’s restriction on telescoping stocks is underscored by the fact that the restriction has no regard to length. A stock could be three feet at its minimum length and still be restricted. No justification would exist based on concealability. However, the length of a firearm impacts its concealability. Prohibitions on concealability are found in the Connecticut Law. For example, the State has expressed an interest in restricting some guns with shoulder stocks based on concealability, as set forth in Conn. Gen. Stat. § 53a-211(a): “A person is guilty of possession of a sawed-off shotgun . . . when he owns, controls or possesses any sawed-off shotgun that has a barrel of less than eighteen inches or an overall length of less than twenty-six inches . . .” *Id.* Moreover, a pistol or revolver is defined to include “any firearm having a barrel less than twelve inches in length.” Conn. Gen. Stat. § 29-27. Possession of any such firearm is prohibited, except that a license entitles one to possess a pistol or revolver. Conn. Gen. Stat. § 29-35. Thus, a shotgun must have a barrel of at least eighteen inches or an overall length of at least twenty-six inches, and a firearm with a barrel of less than twelve inches must be licensed. *Id.* These objective and rational “concealability” standards apply to semiautomatic shotguns and handguns with and without telescoping or folding stocks. Under the Act, however, no

² *Id.*

“concealability” basis exists for restricting semiautomatic shotguns or rifles with telescoping or folding stocks, without regard to overall length.

Pistol Grips or Other Grips Allowing the Fingers To Rest Beneath The Action.

A pistol grip allows a rifle or shotgun to be held at the shoulder with more comfort and stability. Many rifles and shotguns have straight stocks with no pistol grips. Having the above feature has no effect on the functionality of a semiautomatic rifle or shotgun that has an ability to accept a detachable magazine. A pistol grip or other grip that allows the fingers to rest beneath the action of the firearm does not make a firearm more powerful or deadly. Pistol grips assist in achieving sight-aligned accurate fire, a factor about which I have instructed during training. Positioning the rear of the stock into pocket of the shoulder and maintaining it in that position is aided by the pistol grip, and is imperative for accurate sight alignment and thus accurate shooting with rifles of this design, due to the shoulder stock being in a straight line with the barrel. This is because the shooter’s eye functions as the rear sight of the long gun. The more consistent the shooter’s eye is in relation to the line of the stock and barrel, the more accurate the shot placement. This sight alignment between the eye and firearm is not conducive to spray or hip fire. Another purpose for the pistol grip is firearm retention. This is imperative, e.g., during a home invasion if assailant(s) attempt to disarm a citizen in close quarters. The state has no interest in restricting a rifle or shotgun by compromising its retention or accuracy. An unbraced or non-supported firearm is inaccurate and does not necessarily increase the rate of fire, albeit it does increase unintentional hits. With the forward hand holding the fore-end, the rearward hand holding the grip, and the butt securely against the shoulder, a rifle or shotgun may be fired accurately.

A pistol grip does *not* function to allow a rifle to be fired from the hip. Conversely, a rifle with a straight grip and no pistol grip would be more conducive to firing from the hip. Firing from the hip would be highly inaccurate and is simply not a factor in crime. Firing from the hip is often glamorized in movies so that the cinematographers can better show an actor’s facial expressions. In turn, an actor appropriately sighting a long gun would obstruct his/her facial features. In real life, firing from the hip is not accurate and is trained to law enforcement officers for close quarters or a surprise response to an attack before the weapon can be brought up the shoulder. Additionally, as stated above, the terms or nomenclature describing what is considered a “grip” on a rifle or shotgun are vague. For example a right handed shooter that is gripping a standard Remington 870 shotgun would likely use the middle finger of the shooting hand to release the safety behind the trigger prior to the index (trigger) finger being placed on the trigger to fire. During this act the shooter simultaneously “grips” the angled portion of the stock behind the trigger for accuracy and control. Often this portion of a stock is called a “grip.” In fact, if the stock were illegally cut off from that point it would resemble a pistol grip. It is my experience that criminals often cut off the stock of a shotgun in such a manner in order to enhance concealment.

Thumbhole Stock. A thumbhole stock allows the rifle to be held with more comfort and stability, and thus fired more accurately. A thumbhole stock does not make a rifle more powerful or more deadly. Typically found on hunting rifles, it is unclear why it would be designated as an “assault weapon” feature. Whether one’s thumb does or does not go through a hole in the stock is irrelevant to how a rifle functions.

IV. THE IMPACT OF THE ACT'S TEN-ROUND RESTRICTION ON THE ABILITY TO RE-LOAD UNDER THE DURESS OF A SUDDEN ATTACK.

The Act's limitation of the number of rounds allowable for a firearm in the home significantly impairs a homeowner's ability to successfully defend him- or herself while under a criminal attack in the home. The ten-round limitation unreasonably assumes that all homeowners will not need to fire more than ten rounds to defend themselves, or if they need to fire more than ten rounds, that all homeowners possess more than one magazine and are able to load, fire and reload their firearm magazine under criminal attack (as described below). However, a homeowner under the extreme duress of an armed and advancing attacker is likely to fire at, but miss, his or her target. Nervousness and anxiety, lighting conditions, the presence of physical obstacles that obscure a "clean" line of sight to the target, and the mechanics of retreat are all factors which contribute to this likelihood. Under such expected conditions, it is of paramount importance that a homeowner have quick and ready access to ammunition in quantities sufficient to provide a meaningful opportunity to defend herself and/or her loved ones. It is equally important that the homeowner under attack have that capability quickly and efficiently to re-load a firearm after all of the rounds it holds are fired. However, many homeowners cannot re-load quickly or efficiently due to such factors as age, physical limitations, and the stress / anxiety produced by a potentially life-threatening situation. The statute requires a gunsmith or worse, the untrained citizen to "alter" a magazine in order to comply. Said alterations may yield disastrous, if not fatal, results for the victim. It is my experience that most gunsmiths and armorers are trained on a few specific types of firearms rather than altering manufacturers engineered magazine specific to a certain firearm. Minimally, improperly changing the spring tension of a magazine will effect functioning. This sets up the law-abiding citizen for failure as they are unlikely trained to reload under stress, especially if the reloaded magazine is another "altered" version. Additionally, due to liability issues many gunsmiths are reluctant to alter manufacturers specifications when they know a weapon will be used for self-defense purposes.

In order to fully understand this point, an explanation of the mechanics of loading and re-loading a firearm, as well as the physiological response process of a person under the stress of an attack, are required.

A. It May Be Difficult Or Impossible To Load and/or Re-Load The Firearm In Time To Save Oneself From A Sudden Attack.

This section of the Declaration explains the mechanics of loading handguns and using them for self defense.

Police have neither the legal obligation nor the practical ability to rescue all crime victims. Hence, it is essential that all law-abiding citizens be able to protect themselves. This ability to defend one's life and the lives of family and guests is perhaps most crucial in the home, where citizens should feel safe, be able to relax and NOT feel vigilant or concerned about their safety at all times. Violent criminal attacks frequently occur suddenly and without warning, leaving the victim with very little time to fire the handgun to save herself. Reaction time under stress is complicated and can be attributed to many physiological, psychological and environmental factors, but the three most basic are: the ability for an individual to perceive a threat (Perceptual Processing), the ability to make a decision (Cognitive Processing), and the ability of the brain to send messages to the muscles to react (Motor Processing). This processing takes, minimally, several seconds without

consideration of other factors such as distractions, noise, multiple assailants, lighting conditions, nervousness and fatigue. Ref: Management of Aggressive Behavior Instructor Manual, MOAB Training International.

In the well-known Tueller Drill for police training, it is emphasized that an attacker who is 21 feet away can close the entire distance between himself and the victim in a second-and-a-half.³ Most citizens in their homes are not prepared for a potential attack. However if the victim had forewarning, it may be possible to deploy a *loaded* handgun quickly enough for defense against a sudden attack. However, it is impossible to do so with an unloaded handgun. If the victim is not expecting an attack, the fastest reaction time, even for a trained officer with a loaded firearm, is about 3.5 seconds. Bob Irwin, *Rethinking the 21-Foot Rule: You can't react to a knife attack as fast as you think you can*, POLICE, Oct. 1, 2007, <http://www.policemag.com/Channel/Patrol/Articles/2007/10/Rethinking-the-21-Foot-Rule.aspx>. It is important to note that during the Tueller Study, the officers knew they were facing a man with a knife during optimum environmental conditions (thereby negating Perceptual Processor Time). Also, the assailant volunteers used in the study were veteran fellow officers that were not affected by stimulants or were extremely fit and athletic or did not display the characteristics of a motivated aggressor.

1. The Mechanics of Loading / Re-loading a Semi-automatic Firearm

The following is the procedure for loading or re-loading a semi-automatic rifle, pistol or shotgun (except for those with tubular magazines). We assume that the crime victim is a right-handed person, who has done everything lawfully possible to optimize the loading process: namely, she is carrying the handgun in her right hand, and has ready access to a nearby magazine (a rectangular or parallelogram box which holds the ammunition).

1. Grasp the grip (the butt) of the gun with the right hand.
2. Grasp the magazine with the left hand.
3. Bring the gun and the magazine towards the center of one's body. Tilt the gun so that the butt is pointing towards one's left.
4. Depress a magazine release button. (Only required for re-loading. When re-loading, this would be the first step).
5. Use the left hand to insert the magazine into the magazine well of the gun. (In a semi-automatic, the grip is hollow, and contains a space to accommodate the magazine).
6. Use the base of the left hand to push hard on the magazine, so that it clicks

³ The Tueller Drill is performed by trained police with loaded guns. (Or, more precisely, guns which simulate being loaded, such as with special "ammunition" that "fires" a laser when the trigger is pulled). The Tueller reaction times are for officers who already know that the aggressor is encroaching with a knife. Hence, the cognitive deadly force decision-making has been virtually eliminated from the reaction time, and the officer's gun is already loaded. Even then, fewer than 50% of officers were able to draw and fire if the attacker started from within 15 feet away.

into place inside the handgun grip.

7. Turn the handgun so that it is in front of the body, with the muzzle pointing to the left. (Alternatively, hold the handgun so that the muzzle points forward).
8. Continue to hold the handgun grip with the right hand. With the left hand, grasp the top of the handgun.
9. Move the top cartridge in the magazine into the handgun's firing chamber. (A "cartridge" is one unit of ammunition. A unit of ammunition is also called a "round"). Using the left hand, pull the slide of the handgun all the way to its maximum rear position. This requires moving the slide one or more inches against the force of a heavy spring. If the slide is moved even a fraction of an inch short of its maximum rear position, this step will fail, and the gun will not function. The slide is moved with the non-dominant hand. For people without strong upper bodies, including most women, pulling the slide all the way is not an easy maneuver.
10. Now release the slide. The compressed spring pushes the slide forward. As the slide moves forward, it pushes the first cartridge from the magazine into the firing chamber.
11. Now move the left hand to the grip of the gun so that it supports the right hand. Although one-handed shooting is possible, accuracy is substantially improved by a two-handed grip.
12. Finally, bring the handgun up to eye level, and point it at the target.⁴ If the aggressor is within 15 feet, there will not be time to bring the gun to eye level, so the victim simply points the gun at the center of the aggressor's mass.

As the above makes clear, loading a firearm requires two hands. Loading is far more difficult when someone is physically handicapped, or one hand is wounded during an attack. During my extensive experience with force-on-force simulation training, it was a very common occurrence (30-40% occurrence rate) for police officers engaged in a gunfight to be struck in the hand by the attacker. The reason is simple: we shoot at the muzzle flash that draws our attention, and at the opposite end of that flash are hands holding a gun. Having more rounds in a magazine allows the victim to better protect themselves without the need to reload, especially if the victim is handicapped, disabled or injured.

It is known fact that under the "stress flood" of a life or death encounter the blood within one's body is re-routed to the larger muscles so as to allow a "flee or fight" response. This physiological reaction to extreme stress causes significant reloading difficulty during

⁴ Pointing the handgun at the target may be all that time allows, if it allows that much. If there is time to use the handgun's sights, acquire a sight picture by aligning the front sight (which is a small vertical rectangle) within the rear sight (shaped like a "U", but angular), with the same amount of light showing on either side of the front sight, right and left. The top of the front sight should appear flush with top of the rear sight.

an attack due to loss of fine motor control in the fingers. Trying to push a magazine release or align a magazine with the magazine well with fingers that are shaking and weakened due to blood loss is very difficult for a seasoned veteran soldier or police officer who expects this phenomena. These crucial tasks are far more difficult for a civilian who has never been trained that such changes will occur, or trained during realistic scenario-based training, or who is experiencing a life-threatening attack for the first time.

The legitimate and compelling need for an LC magazine for self-defense is underscored by the fact that police officers are exempt from the restrictions on magazine capacity and on loading more than ten rounds in a magazine. CONN. GEN. STAT. § 53-202p(d)(1). The 2010 New York City Police Department's *Annual Firearms Discharge Report*⁵ ("NYPD AFDR") provides detailed information on all incidents in which NYPD officers discharged their weapons in 2010. In that year there were thirty three (33) incidents of the police intentionally discharging firearms in encounters of adversarial conflict. NYPD AFDR at p.8, Figure A.10. 65% of these incidents took place at a distance of less than ten (10) feet. NYPD AFDR at p.9, Figure A.11. In 33% of these incidents, the NYPD officer(s) involved fired more than 7 rounds. NYPD AFDR at p.8, Figure A.10. In 21% of these incidents, the NYPD officer(s) fired more than 10 rounds. Id. If highly trained and experienced police officers required the use of at least 11 rounds in 21% of their close-range encounters to subdue an aggressive assailant, it stands to reason that an untrained civilian gun owner under duress (and certainly far less experienced and trained than a police officer) would need at least that many rounds to stop an imminent assault by one or more armed assailants within his/her home.

2. The Effect of Time Delay Caused by Loading

Police and civilians who train in defensive handgun use learn to draw a loaded handgun, quickly acquire a sight picture, and place two shots on the attacker's upper center of mass. Optimally, all this can be accomplished in a little over two seconds. Bill Lewinski, *Biomechanics of Lethal Forces Encounters-Officer Movements*, THE POLICE MARKSMAN, Nov./Dec. 2002, at 19 (during a test of 68 Los Angeles Police Dept. officers using already-loaded guns, they took an average of 1.71 seconds to draw a firearm from an unsnapped holster and fire one shot, with the hand already very near the holster; .38 seconds to fire second shot).

Quite obviously, the process of loading the handgun will take at least a few extra seconds. Extensive practice can reduce how long it takes a person to load a firearm under stress, but that time cannot be reduced to zero. Accordingly, the simple time delay of loading a spent firearm may result in the success of a violent attacker who otherwise could have been thwarted.

Carrying an unloaded firearm will often not provide a viable means of self-defense and would frequently result in a situation where the assailant has closed the distance on the victim so that the assailant is on the person of the victim. The victim is left with a firearm she needs to retain so that she is not shot with her own gun. At best then, the firearm becomes a bludgeoning tool.

⁵ http://www.nyc.gov/html/nypd/downloads/pdf/analysis_and_planning/afdr_20111116.pdf

3. The Effect of the Loss of Defensive Use of the Non-dominant Arm and Hand.

The delay in loading a firearm has additional deadly implications. While the left arm and hand are being used to load the handgun, they cannot be used for anything else, such as opening a door to retreat or redirecting a family member out of harm's way. The victim is more vulnerable because both hands are occupied. The non-gun hand becomes useless to fend off the attacker or to deflect the attacker's knife, stick, or other weapon.

Further, if the victim were to be grabbed during the loading of the firearm, the sympathetic nervous system reaction of clenching one hand to retain the magazine, or simply tightening muscles under stress would further limit the victim's ability to complete the loading of the firearm.

4. The Effects of Attention Distraction Caused by Loading

The unloaded firearm forces the victim to focus her attention on the firearm in order to load and chamber the ammunition. As a result, the victim is impeded from focusing attention on the assailant and her surroundings. Specifically, the need to load while under imminent threat:

- compromises and complicates decision making;
- limits perception of surroundings, increasing the likelihood that a fired shot will miss the intended target and strike an unintended target;
- limits ability to determine if retreat to safety is possible;
- limits ability to determine if there is another assailant; and
- limits ability to assess the level and nature of threat (i.e., has the aggressor drawn another weapon? Engaged someone as an accomplice? Given other pre-fight indicators, such as changing stance, glancing at the potential target?).

Brain-wave research of Olympic shooters shows that the greater a shooter's distraction, the greater the possibility of a miss. Bill Lewinski, *Stress Reactions of Lethal Forces Encounters*, THE POLICE MARKSMAN, May/June 2002, at 27; N. Kontinen, D.M. Landers, & H. Lyytinen, *Aiming Routines and Their Electro cortical Concomitants Among Competitive Rifle Shooters*, 10 SCANDANAVIAN J. MED. & SCI. IN SPORT 169 (2000).

V. CONCLUSION

On a nationwide basis most pistols are manufactured with magazines holding 10 to 17 rounds, and many popular rifles are manufactured with magazines holding 10, 20, or 30 rounds. The Act's criminalization of magazines that hold more than 10 rounds outlaws the most commonly used pistols and rifles not just within the State of Connecticut, but in the USA.

The Act's criminalization of LC magazines requires law-abiding gun owners who wish to maintain such LC magazines, and who are ineligible to register them, to convert them, but provides no guidance on the means, methods, or standards it will apply to determine whether a converted magazine is adequately "incapable" of ready restoration. In addition, undertaking such a conversion requires engineering knowhow, parts, and equipment that are beyond the capacity of an ordinary, law-abiding gun owner. In my experience, competent alterations to magazines are beyond the scope of ethical gunsmiths who would be willing to bet someone's life on an *ad hoc* conversion for self-defense, or for that matter who may put a person in jeopardy of a prison sentence.

The Act's restrictions on stocks and grips of rifles and shotguns are irrational, and do not reflect characteristics that make a rifle or shotgun more powerful, dangerous or deadly. Rather, they enable accurate shot placement and weapon retention in close quarters. A responsible firearm owner wants to be accountable for all rounds that he shoots. These characteristics of firearms increase the ability to protect one's family by accurate fire. These firearm characteristics are therefore necessary and rationally related to the core Second Amendment purpose of self-defense.

The Act's limitation of the number of rounds allowable for a firearm in the home significantly impairs a homeowner's ability to successfully defend him or herself while under a criminal attack in the home.

I have reviewed the foregoing statements, and hereby declare under the penalties of perjury that they are true, correct, complete and accurate according to the best of my knowledge, information, and belief.



GUY ROSSI

Dated: June 25, 2013

EXHIBIT D

8. I have been the victim of an armed crime. Several years ago, while visiting in Detroit, I was held up at gun point by four (4) men and had my property stolen.

9. On April 4, 2013, the Governor of Connecticut signed into law An Act Concerning Gun Violence Prevention and Children's Safety ("the Act"). With certain exceptions, the Act bans "large capacity magazines" (magazines that can accept more than 10 rounds of ammunition). I understand that, starting January 1, 2014, possession of a "large capacity magazine" is a Class D felony. If the "large capacity magazine" was obtained before the Act's passage, a first offense for possessing it is an infraction subject to a fine, but any subsequent offense is a Class D felony.

10. The Act bans "assault weapons," the definition of which includes a semiautomatic rifle that has an ability to accept a detachable magazine, and which also has: a folding or telescoping stock; or a thumbhole stock; or any other stock which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing; or a forward pistol grip.

11. The Act's definition of "assault weapon" also includes a semiautomatic pistol that has the ability to accept a detachable magazine, and which also has at least one of the following: an ability to accept a detachable magazine that attaches at some location outside the pistol grip; a threaded barrel capable of accepting a flash suppressor, forward pistol grip or silencer; a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to fire the firearm without being burned, except a slide that encloses the barrel; or a second hand grip.

12. I have been directly and adversely impacted by the passage and enforcement of the Act in several different ways.

13. I currently own magazines that can hold more than ten rounds of ammunition (hereinafter "Large Capacity Magazines," "LC mags"). These magazines were legally purchased. Under the Act, I must either declare possession of these magazines to the Department of Emergency Services and Public Protection, or otherwise divest myself of them by no later than January 1, 2014. Should I fail to do this I face criminal prosecution, a possible felony conviction, and even jail time. I am a conscientious objector and have a principled opposition to registering my firearms. However, the LC Mags that I (and thousands of other gun owners like me) have legally owned for years according to Connecticut law make me a criminal under the Act.

14. Semiautomatic pistols will not function without magazines. As noted, I only own magazines that hold more than ten rounds. My ability to use my pistols with my magazines exists only to the extent I declare possession thereof to the authorities and to the extent they do not wear out. The inability to use my firearms as designed and intended violates my

fundamental constitutional right under the Second Amendment to use firearms to defend my loved ones, my property and my home.

15. I understand that the Act defines a “large capacity magazine” as one that has the “capacity of, or can be readily restored or converted to accept, more than 10 rounds of ammunition.” I further understand that the Act excludes from this definition magazines that have “been permanently altered” so that they cannot accommodate more than ten rounds of ammunition and that are “permanently inoperable.”

16. I understand that if I wish to retain my grandfathered magazines, I must either declare my possession of them to the Department of Emergency Services and Protection, or otherwise “permanently” alter them so that they are inoperable or incapable of accepting more than ten rounds of ammunition.

17. I am not trained as a gunsmith. I do not know how to alter or modify an ammunition magazine. I do not have the experience, skill, tools, or parts that safe and responsible alterations or modifications require.

18. Even if I had the skill, experience, tools and parts to modify or alter an ammunition magazine, I still have no understanding of the means or methods of alteration or modification required by the Act, or what constitutes the “ready restoration,” “ready conversion,” or “permanent inoperability” of a magazine. These terms are not defined by the Act, and the State of Connecticut has not provided any guidance on what these phrases mean.

19. I am afraid that if I were to have an ammunition magazine altered or modified in a way that the State disapproved of, I would be criminally prosecuted or imprisoned. But I have no reasonable way of knowing which kinds of modifications or alterations the State deems legal.

20. I understand that the Act lists over 160 different models of firearms as “assault weapons.” The act outlaws “copies or duplicates” of 88 of these firearms, provided that they have the same “capability” of the listed rifle and “were in production prior to or on the effective date” of the Act. I also understand that the Act also defines 67 different kinds of “assault weapons” as “any combination of parts from which an assault weapon may be rapidly assembled.”

21. I am unfamiliar with many of the 88 different models of firearms the Act calls “assault weapons.” I have no way of knowing which ones may have been in production prior to or on the effective date of the Act, and I know of no source to research their production histories. I have no way of knowing what would be a “duplicate” or “copy” of a listed firearm, or what it means to have “the capability of any such” firearm, which may or may not refer to rate of fire, caliber, ballistics, range, durability, accuracy, barrel length, barrel diameter, sights, internal parts and operation (such as disconnecter, firing pin, bolt, etc.), trigger pull, or some entirely different factor altogether.

22. I am unfamiliar with the individual parts or components that comprise the 67 different firearms the Act calls “assault weapons.” I don’t know which “combination of parts” could “rapidly be assembled” into a banned firearm.

23. I am afraid that if I were to obtain a firearm that is later determined to be a "duplicate or copy" of a banned firearm I would be criminally prosecuted or imprisoned. I am likewise afraid that I could possess a "combination" of illegal parts for which I could be prosecuted and jailed. But I have no reasonable way of knowing what the State deems to be an illegal "duplicate" or "copy," what the term "capability" means, or which parts comprise so many different kinds of firearms.

24. Since the passage of the Act, I have inquired of different gun sellers as to the ability to acquire various firearms and magazines. I made these inquiries to the Newington Gun Exchange (located in Newington, CT), Remarcable Arms (located in Wallingford, CT), and JoJo's Gun Works (located in Southington, CT) between May 8th and May 11th of 2013 .

25. As mentioned above, I currently own a Browning 9mm pistol, which was originally equipped with a magazine that holds more than ten (10) rounds. I asked each of the above sellers if it was possible to purchase a LC mag for this pistol. In response, I was told that while they had these magazines in stock, they were for not available for sale.

26. I also asked each of these sellers which types of AR-type modern sporting rifles could or could not be legally sold. The sellers advised me that no AR-15 type modern sporting rifles were legally available for sale to Connecticut residents. One seller advised that he had gone so far as to strip all of the AR-15 type firearms that he had in inventory for fear that he would be prosecuted for possessing fully assembled versions of them.

27. Finally, I asked these sellers if it was possible to buy a Colt Sporter rifle, a Colt Match Target Rifle, a VEPR rifle in 7.62 x 54R with 5 round magazine, an IZHMAASH Saiga 12 Shotgun with 2 round magazine. The dealers advised that each of these arms was on a list of "banned" firearms and could not be sold.

28. I also inquired of the West Hartford Police Department as to whether I could presently purchase a magazine that was capable of holding more than ten (10) rounds of ammunition. In response, I was told that I was not able to do that as it was illegal, and that if I were to do so I would most likely be arrested.

29. I have reviewed the foregoing statements, and they are true, accurate and complete to the best of my knowledge, information and belief.

/s/ 
JUNE SHEW

Sworn to before me
This 25th day of June, 2013.

Georgette R. Gaul
Georgette R. Gaul, Notary Public
My Commission Expires: 09/30/2016



EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

JUNE SHEW, et al,

Plaintiffs,

-against-

DANNEL P. MALLOY, et al,

Defendants.

Civil No. 3:13-cv-739-AVC

AFFIDAVIT

STATE OF CONNECTICUT)
)
COUNTY OF FAIRFIELD)

BRIAN McClAIN, being duly sworn, hereby states the following under penalties of perjury.

1. I am over the age of 18 and believe in the nature of an oath.
2. I am submitting this affidavit in support of a motion for preliminary injunction filed by the plaintiffs herein.
3. I am a resident of the State of Connecticut, and a citizen of the United States. I have never been arrested or convicted of any crime. I currently possess a Conceal Carry ("CCW") firearm permit issued by the State of Connecticut. This permit has never been suspended or revoked.
4. I am 73 years old. I am widowed, and live in Monroe, CT. I have a Masters Degree in Business Administration that I obtained from Sacred Heart University. I am a retired industrial designer. Prior to my retirement I worked for IBM.
5. I own different types of firearms. I own two (2) Smith & Wesson M-5906 9 mm caliber semiautomatic pistols, each of which accepts a standard 15-round magazine. Each of these firearms was legally purchased.
6. I own several magazines that I use with these firearms. All of these magazines were legally purchased. However, none of these magazines hold ten rounds or less. I only possess magazines for these arms that hold more than ten (10) rounds of ammunition, and my firearms will not operate without magazines. I use these firearms to defend my self, my property and my home.
7. On April 4, 2013, the Governor of Connecticut signed into law An Act Concerning Gun Violence Prevention and Children's Safety ("the Act"). With certain

exceptions, the Act bans "large capacity magazines" (magazines that can accept more than 10 rounds of ammunition). I understand that, starting January 1, 2014, possession of a "large capacity magazine" is a Class D felony. If the "large capacity magazine" was obtained before the Act's passage, a first offense for possessing it is an infraction subject to a fine, but any subsequent offense is a Class D felony.

8. The Act bans "assault weapons," the definition of which includes a semiautomatic rifle that has an ability to accept a detachable magazine, and which also has: a folding or telescoping stock; or a thumbhole stock; or any other stock which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing; or a forward pistol grip.

9. The Act's definition of "assault weapon" also includes a semiautomatic pistol that has the ability to accept a detachable magazine, and which also has at least one of the following: an ability to accept a detachable magazine that attaches at some location outside the pistol grip; a threaded barrel capable of accepting a flash suppressor, forward pistol grip or silencer; a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to fire the firearm without being burned, except a slide that encloses the barrel; or a second hand grip.

10. I have been directly and adversely impacted by the passage and enforcement of the Act in several different ways.

11. As mentioned above, I currently own magazines that can only hold more than ten rounds of ammunition (hereinafter "Large Capacity Magazines," "LC mags"). Under the Act, I must either declare possession of these magazines to the Department of Emergency Services and Public Protection, or otherwise divest myself of these magazines by no later than January 1, 2014. Should I fail to do this I face criminal prosecution, a possible felony conviction, and even jail time. The LC Mags that I (and thousands of other gun owners like me) have legally owned for years according to Connecticut law make me a criminal under the Act.

12. Semiautomatic pistols will not function without magazines. As noted, I only own magazines that hold more than ten rounds. My ability to use my pistols with my magazines exists only to the extent I declare possession thereof to the authorities and to the extent they do not wear out. The inability to use my firearms as designed and intended violates my fundamental constitutional right under the Second Amendment to use firearms to defend my loved ones, my property and my home.

13. The Act's ban on firearms that have physical characteristics that now qualify them as "assault weapons" has had a direct and adverse impact on me.

14. The Act outlaws semi-automatic rifles that can accept detachable magazines, and also have a thumbhole stock, a telescoping stock, a forward grip, or any grip that permits the fingers of the trigger hand to rest below the firearm's action when firing.

15. These features (thumbhole stocks, telescoping stocks, forward grips, and grips that protrude below the action of the firearm) are safety and comfort features that permit me to shoot my guns more accurately.

16. I own a Stag 5.56 caliber AR-15 type modern sporting rifle. This firearm was legally purchased. This is a semi-automatic rifle that can accept a detachable magazine and also has a pistol grip. The presence of a grip that protrudes beneath the rifle's action does not make my rifle more powerful or deadly. This grip provides me with sight-aligned accurate fire. The more consistent that my shooting eye is in relation to the line of the stock and barrel, the more accurate my shot placement will be.

17. I understand that the Act defines a "large capacity magazine" as one that has the "capacity of, or can be readily restored or converted to accept, more than 10 rounds of ammunition." I further understand that the Act excludes from this definition magazines that have "been permanently altered" so that they cannot accommodate more than ten rounds of ammunition and that are "permanently inoperable."

18. I understand that if I wish to retain my grandfathered magazines, I must either declare my possession of them to the Department of Emergency Services and Protection, or otherwise "permanently" alter them so that they are inoperable or incapable of accepting more than ten rounds of ammunition.

19. I am not trained as a gunsmith. I do not know how to alter or modify an ammunition magazine. I do not have the experience, skill, tools, or parts that safe and responsible alterations or modifications require.

20. Even if I had the skill, experience, tools and parts to modify or alter an ammunition magazine, I still have no understanding of the means or methods of alteration or modification required by the Act, or what constitutes the "ready restoration," "ready conversion," or "permanent inoperability" of a magazine. These terms are not defined by the Act, and the State of Connecticut has not provided any guidance on what these phrases mean.

21. I am afraid that if I were to have an ammunition magazine altered or modified in a way that the State disapproved of, I would be criminally prosecuted or imprisoned. But I have no reasonable way of knowing which kinds of modifications or alterations the State deems legal.

22. I understand that the Act lists over 160 different models of firearms as "assault weapons." The act outlaws "copies or duplicates" of 88 of these firearms, provided that they have the same "capability" of the listed rifle and "were in production prior to or on the effective date" of the Act. I also understand that the Act also defines 67 different kinds of "assault weapons" as "any combination of parts from which an assault weapon may be rapidly assembled."

23. I am unfamiliar with many of the 88 different models of firearms the Act calls "assault weapons." I have no way of knowing which ones may have been in production prior to or on the effective date of the Act, and I know of no source to research their production

histories. I have no way of knowing what would be a “duplicate” or “copy” of a listed firearm, or what it means to have “the capability of any such” firearm, which may or may not refer to rate of fire, caliber, ballistics, range, durability, accuracy, barrel length, barrel diameter, sights, internal parts and operation (such as disconnecter, firing pin, bolt, etc.), trigger pull, or some entirely different factor altogether.

24. I am unfamiliar with the individual parts or components that comprise the 67 different firearms the Act calls “assault weapons.” I don’t know which “combination of parts” could “rapidly be assembled” into a banned firearm.

25. I am afraid that if I were to obtain a firearm that is later determined to be a “duplicate or copy” of a banned firearm I would be criminally prosecuted or imprisoned. I am likewise afraid that I could possess a “combination” of illegal parts for which I could be prosecuted and jailed. But I have no reasonable way of knowing what the State deems to be an illegal “duplicate” or “copy,” what the term “capability” means, or which parts comprise so many different kinds of firearms.

26. On Wednesday, May 8, 2013, I traveled to the Connecticut Gun Exchange located in Monroe, CT. While there, I asked if it were possible to purchase a magazine that was capable of holding more than ten (10) rounds of ammunition. In response, I was told that this was illegal.

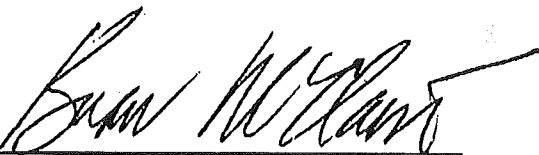
27. As mentioned above, I currently own two (2) Smith & Wesson M-5906 9 mm caliber semiautomatic pistols, each of which accepts a standard 15-round magazine. While at the Connecticut Gun Exchange, I asked if I could purchase a 15-round magazine for these pistols. In response, I was told that 15-round magazines for my firearms are not available for sale.

28. Also during my visit to the store, I asked if it were possible to purchase any kind of AR-15 type modern sporting rifle. I was told that all AR-15 type firearms are now banned. When I asked if I could purchase an AR-type rifle that was not on the list of “banned firearms,” I was advised that Stag AR-15 type rifles do not appear on the list of firearms banned in Connecticut, but that since Stag AR-15 type rifles have a pistol grip they are “banned anyway.”

29. Finally, during my visit to the Connecticut Gun Exchange, I asked if it was possible to purchase a Colt Sporter rifle, a Colt Match Target Rifle, and/or an IZHMASHER Saiga 12 Shotgun with 2 round magazine. The dealer, however, said these arms could not be sold as they were on a list of “banned” firearms.

30. On May 8, 2013, I inquired of a police officer with the Shelton Police Department as to whether I could presently purchase a magazine that was capable of holding more than ten (10) rounds of ammunition. In response, I was told that I was not able to do that as it was illegal, and that if I were to do so I would be arrested.

31. I have reviewed the foregoing statements, and they are true, accurate and complete to the best of my knowledge, information and belief.

/s/ 
BRIAN McCLAIN

Sworn to before me
this 25th day of June, 2013.


NOTARY PUBLIC



EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

JUNE SHEW, et al,

Plaintiffs,

-against-

DANNEL P. MALLOY, et al,

Defendants.

Civil No. 3:13-cv-739-AVC

AFFIDAVIT

STATE OF CONNECTICUT)
)
COUNTY OF LITCHFIELD)

STEPHANIE CYPHER, being duly sworn, hereby states the following under penalties of perjury.

1. I am over the age of 18 and believe in the nature of an oath.
2. I am submitting this affidavit in support of a motion for preliminary injunction filed by the plaintiffs herein.
3. I am a resident of the State of Connecticut, and a citizen of the United States. I have never been arrested or convicted of any crime. I currently possess a Permit To Carry Pistols and Revolvers issued by the State of Connecticut. This permit has never been suspended or revoked.
4. I am 44 years old. I have been married since 1999 and live with my husband in Plymouth, CT. I obtained a Bachelor of Arts Degree from Rochville University in 2006. I am currently employed as the Director of Human Resources for an insurance company located in Hartford, CT. I have worked in the Human Resources field for fifteen (15) years.
5. I own several different types of firearms and components, including a Saiga shotgun, which was originally equipped with a magazine that holds more than ten rounds of ammunition. This firearm was legally purchased. I own several magazines that I use with these firearm. All of these magazines were legally purchased. However, none of these magazines hold ten rounds or less. I only possess magazines for this shotgun that hold more than ten (10) rounds of ammunition, and my shotgun will not operate without magazines.
6. I am physically disabled. When I was 12 years old I lost my right arm to cancer.
7. On April 4, 2013, the Governor of Connecticut signed into law An Act Concerning Gun Violence Prevention and Children's Safety ("the Act"). With certain

exceptions, the Act bans "large capacity magazines" (magazines that can accept more than 10 rounds of ammunition). I understand that, starting January 1, 2014, possession of a "large capacity magazine" is a Class D felony. If the "large capacity magazine" was obtained before the Act's passage, a first offense for possessing it is an infraction subject to a fine, but any subsequent offense is a Class D felony.

8. The Act bans "assault weapons," the definition of which includes a semiautomatic rifle that has an ability to accept a detachable magazine, and which also has: a folding or telescoping stock; a thumbhole stock; or any other stock which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing; or a forward pistol grip.

9. The Act's definition of "assault weapon" also includes a semiautomatic pistol that has the ability to accept a detachable magazine, and which also has at least one of the following: an ability to accept a detachable magazine that attaches at some location outside the pistol grip; a threaded barrel capable of accepting a flash suppressor, forward pistol grip or silencer; a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to fire the firearm without being burned, except a slide that encloses the barrel; or a second hand grip.

10. The Act's definition of "assault weapon" also includes a semiautomatic shotgun that can accept a detachable magazine, or which has both a telescoping stock and a forward pistol grip or any other stock which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing.

11. I have been directly and adversely impacted by the passage and enforcement of the Act in several different ways.

12. I currently own magazines that can hold more than ten rounds of ammunition (hereinafter "Large Capacity Magazines," "LC mags"). These magazines were legally purchased. Under the Act, I must either declare possession of these magazines to the Department of Emergency Services and Public Protection, or otherwise divest myself of them by no later than January 1, 2014. Should I fail to do this, I face criminal prosecution, a possible felony conviction, and even jail time. The LC Mags that I (and thousands of other gun owners like me) have legally owned for years according to Connecticut law make me a criminal under the Act.

13. As discussed above, I am physically disabled: I only have one upper extremity (my left). My disability makes it extremely difficult to change magazines with ease or quickness. Since I can only use my left hand, it takes me more time to exchange an empty magazine for a full one than it does an able-bodied shooter. In order to change a spent magazine, I must place my firearm down on a bench or table, press the magazine eject button, wiggle the magazine free, exchange the spent magazine for a new one, and then pick up the firearm and continue shooting.

14. During a magazine change I am effectively unarmed, and the extended time I need to re-load my firearms increases my vulnerability to a criminal attacker advancing during the change. This vulnerability is eliminated by my ability to use a magazine that holds greater than ten rounds: the longer I am able to fire my gun in self-defense, the less exposed I am to the physical danger presented during re-loading. However, the Act's prohibition on LC mags only reinforces my vulnerability.

15. I understand that the Act defines a "large capacity magazine" as one that has the "capacity of, or can be readily restored or converted to accept, more than 10 rounds of ammunition." I further understand that the Act excludes from this definition magazines that have "been permanently altered" so that they cannot accommodate more than ten rounds of ammunition and that are "permanently inoperable."

16. I understand that if I wish to retain my grandfathered magazines, I must either declare my possession of them to the Department of Emergency Services and Protection, or otherwise "permanently" alter them so that they are inoperable or incapable of accepting more than ten rounds of ammunition.

17. I am not trained as a gunsmith. I do not know how to alter or modify an ammunition magazine. I do not have the experience, skill, tools, or parts that safe and responsible alterations or modifications require.

18. Even if I had the skill, experience, tools and parts to modify or alter an ammunition magazine, I still have no understanding of the means or methods of alteration or modification required by the Act, or what constitutes the "ready restoration," "ready conversion," or "permanent inoperability" of a magazine. These terms are not defined by the Act, and the State of Connecticut has not provided any guidance on what these phrases mean.

19. I am afraid that if I were to have an ammunition magazine altered or modified in a way that the State disapproved of, I would be criminally prosecuted or imprisoned. But I have no reasonable way of knowing which kinds of modifications or alterations the State deems legal.

20. I understand that the Act lists over 160 different models of firearms as "assault weapons." The act outlaws "copies or duplicates" of 88 of these firearms, provided that they have the same "capability" of the listed rifle and "were in production prior to or on the effective date" of the Act. I also understand that the Act also defines 67 different kinds of "assault weapons" as "any combination of parts from which an assault weapon may be rapidly assembled."

21. I am unfamiliar with many of the 88 different models of firearms the Act calls "assault weapons." I have no way of knowing which ones may have been in production prior to or on the effective date of the Act, and I know of no source to research their production histories. I have no way of knowing what would be a "duplicate" or "copy" of a listed firearm, or what it means to have "the capability of any such" firearm, which may or may not refer to rate of fire, caliber, ballistics, range, durability, accuracy, barrel length, barrel diameter, sights,

internal parts and operation (such as disconnecter, firing pin, bolt, etc.), trigger pull, or some entirely different factor altogether.

22. I am unfamiliar with the individual parts or components that comprise the 67 different firearms the Act calls "assault weapons." I don't know which "combination of parts" could "rapidly be assembled" into a banned firearm.

23. I am afraid that if I were to obtain a firearm that is later determined to be a "duplicate or copy" of a banned firearm I would be criminally prosecuted or imprisoned. I am likewise afraid that I could possess a "combination" of illegal parts for which I could be prosecuted and jailed. But I have no reasonable way of knowing what the State deems to be an illegal "duplicate" or "copy," what the term "capability" means, or which parts comprise so many different kinds of firearms.

24. On Monday, May 6, 2013 I visited Riverview Sales & Firearms in East Windsor, CT. While there, I asked if it was possible to purchase a magazine that was capable of holding more than ten (10) rounds of ammunition. In response, I was told that I was not able to do that as it was illegal.

25. On Monday, May 21, 2013 I visited Hoffman's Gun Center in Newington, CT. While there, I asked if it was possible to purchase a magazine that was capable of holding more than ten (10) rounds of ammunition. In response, I was told that I was not able to do that as it was illegal.


26. I currently own a Saiga shotgun, which was originally equipped with a magazine that holds more than ten rounds of ammunition. Semiautomatic shotguns will not function without magazines. As noted, I only own magazines that hold more than ten rounds. My ability to use my shotgun with my magazines exists only to the extent I declare possession thereof to the authorities and to the extent they do not wear out. The inability to use my shotgun as designed and intended violates my fundamental constitutional right under the Second Amendment to use firearms to defend my loved ones, my property and my home.

27. While at these stores, I asked if I could purchase a magazine for this firearm that held more than ten rounds of ammunition. In response, I was told that such magazines for my shotgun are not available for sale.

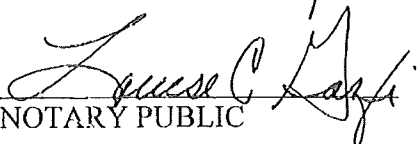
28. Also during my visit to the stores, I asked what AR-type rifles could or could not be legally sold. The salesperson at the Riverview store couldn't answer this question, saying to me that she "really wasn't sure what was banned or what wasn't" and that trying to figure out what guns were legal was "really complicated." The dealer referred me to the State's website so I could try and figure this out for myself.

29. On Monday, May 6th, 2013 I inquired of a local police officer as to whether I could presently purchase a magazine that was capable of holding more than ten (10) rounds of ammunition. In response, I was told that I was not able to do that as it was illegal, and that if I were to do so I would be arrested.

30. I have reviewed the foregoing statements, and they are true, accurate and complete to the best of my knowledge, information and belief.

/s/ 
STEPHANIE CYPHER

Sworn to before me
this 25th day of June, 2013.


NOTARY PUBLIC

LOUISE C. GARFI
NOTARY PUBLIC OF CONNECTICUT
My Commission Expires 6/30/2016

EXHIBIT G

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

JUNE SHEW, et al,

Plaintiffs,

-against-

DANNEL P. MALLOY, et al,

Defendants.

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Civil No. 3:13-cv-739-AVC

**DECLARATION OF
MITCHELL ROCKLIN**

STATE OF CONNECTICUT)
)
COUNTY OF FAIRFIELD)

I, **MITCHELL ROCKLIN**, hereby declare as follows

1. I am over the age of 18 and believe in the nature of an oath.
2. I am submitting this declaration in support of a motion for preliminary injunction filed by the plaintiffs herein.
3. I am a resident of the State of Connecticut, and a citizen of the United States. I have never been arrested or convicted of any crime. I currently possess a Permit To Carry Pistols and Revolvers issued by the State of Connecticut. This permit has never been suspended or revoked.
4. I am 28 years old. I live with my wife and children in Fairfield, CT. I have a Masters of Arts degree in Philosophy from the City University of New York. I am a rabbi at Congregation Ahavath Achim in Fairfield. I have served the community in this capacity for 4.5 years. I also serve our country as a Captain in the U.S. Army Reserves.
5. I currently own several different types of firearms. I own a Glock 9x19 caliber semi-automatic handgun, which comes standard with a 15-round magazine. In addition, I own certain firearms components, such as stripped AR-15 style lower receivers.
6. I own several magazines that I use with these firearms. These magazines all have the capacity to carry more than ten rounds of ammunition. My firearm, receivers, and magazines were all lawfully and legally purchased. None of the magazines I own hold ten rounds or less. I only possess magazines for these arms that hold more than ten (10) rounds of ammunition, and my firearms will not operate without magazines. I use these firearms to defend myself, my property and my home.

7. I am a member of the Bridgeport Shooting Range. I enjoy practicing with my handgun at my local shooting range. Most importantly, I use my handgun to defend my family, my property and my home.

8. There have been several break-ins at my synagogue. During one such break-in, I was present with my wife. In addition, a support staffer who works at the synagogue has been repeatedly threatened by a local man who is mentally disturbed. All of these incidents have been reported to the police. I live in very close proximity to my synagogue.

9. On April 4, 2013, the Governor of Connecticut signed into law An Act Concerning Gun Violence Prevention and Children's Safety ("the Act"). With certain exceptions, the Act bans "large capacity magazines" (magazines that can accept more than 10 rounds of ammunition). I understand that, starting January 1, 2014, possession of a "large capacity magazine" is a Class D felony. If the "large capacity magazine" was obtained before the Act's passage, a first offense for possessing it is an infraction subject to a fine, but any subsequent offense is a Class D felony.

10. The Act bans "assault weapons," the definition of which includes a semiautomatic rifle that has an ability to accept a detachable magazine, and which also has: a folding or telescoping stock; or a thumbhole stock; or any other stock which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing; or a forward pistol grip.

11. The Act's definition of "assault weapon" also includes a semiautomatic pistol that has the ability to accept a detachable magazine, and which also has at least one of the following: an ability to accept a detachable magazine that attaches at some location outside the pistol grip; a threaded barrel capable of accepting a flash suppressor, forward pistol grip or silencer; a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to fire the firearm without being burned, except a slide that encloses the barrel; or a second hand grip.

12. I have been directly and adversely impacted by the passage and enforcement of the Act in several different ways.

13. I currently own magazines that can hold more than ten rounds of ammunition (hereinafter "Large Capacity Magazines," "LC mags"). Under the Act, I must either declare possession of these magazines to the Department of Emergency Services and Public Protection, or otherwise divest myself of these magazines by no later than January 1, 2014. Should I fail to do this I face criminal prosecution, a possible felony conviction, and even jail time. The LC Mags that I (and thousands of other gun owners like me) have legally owned for years according to Connecticut law make me a criminal under the Act.

14. Semiautomatic pistols will not function without magazines. As noted, I only own magazines that hold more than ten rounds. My ability to use my pistols with my magazines exists only to the extent I declare possession thereof to the authorities and to the extent they do not wear out. The inability to use my firearms as designed and intended violates my

fundamental constitutional right under the Second Amendment to use firearms to defend my loved ones, my property and my home.

15. I understand that the Act defines a “large capacity magazine” as one that has the “capacity of, or can be readily restored or converted to accept, more than 10 rounds of ammunition.” I further understand that the Act excludes from this definition magazines that have “been permanently altered” so that they cannot accommodate more than ten rounds of ammunition and that are “permanently inoperable.”

16. I understand that if I wish to retain my grandfathered magazines, I must either declare my possession of them to the Department of Emergency Services and Protection, or otherwise “permanently” alter them so that they are inoperable or incapable of accepting more than ten rounds of ammunition.

17. I am not trained as a gunsmith. I do not know how to alter or modify an ammunition magazine. I do not have the experience, skill, tools, or parts that safe and responsible alterations or modifications require.

18. Even if I had the skill, experience, tools and parts to modify or alter an ammunition magazine, I still have no understanding of the means or methods of alteration or modification required by the Act, or what constitutes the “ready restoration,” “ready conversion,” or “permanent inoperability” of a magazine. These terms are not defined by the Act, and the State of Connecticut has not provided any guidance on what these phrases mean.

19. I am afraid that if I were to have an ammunition magazine altered or modified in a way that the State disapproved of, I would be criminally prosecuted or imprisoned. But I have no reasonable way of knowing which kinds of modifications or alterations the State deems legal.

20. I understand that the Act lists over 160 different models of firearms as “assault weapons.” The act outlaws “copies or duplicates” of 88 of these firearms, provided that they have the same “capability” of the listed rifle and “were in production prior to or on the effective date” of the Act. I also understand that the Act also defines 67 different kinds of “assault weapons” as “any combination of parts from which an assault weapon may be rapidly assembled.”

21. I am unfamiliar with many of the 88 different models of firearms the Act calls “assault weapons.” I have no way of knowing which ones may have been in production prior to or on the effective date of the Act, and I know of no source to research their production histories. I have no way of knowing what would be a “duplicate” or “copy” of a listed firearm, or what it means to have “the capability of any such” firearm, which may or may not refer to rate of fire, caliber, ballistics, range, durability, accuracy, barrel length, barrel diameter, sights, internal parts and operation (such as disconnecter, firing pin, bolt, etc.), trigger pull, or some entirely different factor altogether.

22. I am unfamiliar with the individual parts or components that comprise the 67 different firearms the Act calls "assault weapons." I don't know which "combination of parts" could "rapidly be assembled" into a banned firearm.

23. I am afraid that if I were to obtain a firearm that is later determined to be a "duplicate or copy" of a banned firearm I would be criminally prosecuted or imprisoned. I am likewise afraid that I could possess a "combination" of illegal parts for which I could be prosecuted and jailed. But I have no reasonable way of knowing what the State deems to be an illegal "duplicate" or "copy," what the term "capability" means, or which parts comprise so many different kinds of firearms.

24. On Wednesday, May 8, 2013 I traveled to the K-5 Arms Exchange located in Milford, CT. While there, I inquired if it were possible to purchase a magazine that was capable of holding more than ten (10) rounds of ammunition. In response, I was told that I was not able to do that as it was illegal.

25. As mentioned above, I currently own a Glock 9x19 caliber handgun, which was originally equipped with a 15-round magazine. While at this store, I inquired if it were possible to purchase a 15-round round magazine for this firearm. In response, I was told that 15-round magazines for my firearm are no longer available.

26. Also during my visit to the K-5 store, I inquired if it were possible to purchase either a Surplus Arms & Ammo AR-15 type modern sporting rifle, or a Springfield Armory AR-15 type modern sporting rifle (both of which, as I understand it, are NOT on a "banned" firearms list), but the dealer refused to sell me these firearms. The reason for this was that the dealer could not determine whether the firearms I wished to purchase were "copies or duplicates" of a banned gun.

27. Finally, during my visit to the K-5 store, I inquired if it were possible to purchase a Colt Sporter rifle, a Colt Match Target Rifle, a VEPR rifle in 7.62 x 54R with 5 round magazine, and an IZHMAISH Saiga 12 Shotgun with 2 round magazine. The dealer, however, advised me that they were on a list of "banned" firearms and could not be sold.

28. On or about May 6, 2013, I inquired of a police officer with the Ridgefield Police Department as to whether I could presently purchase a magazine that was capable of holding more than ten (10) rounds of ammunition. In response, I was told that I was not able to do that as it was illegal, and that if I were to do so I would be arrested.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed in Fairfield, Fairfield County, Connecticut on this 25th day of June, 2013.

/s/ 
MITCHELL ROCKLIN

EXHIBIT H

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

JUNE SHEW, et al,

Plaintiffs,

-against-

DANNEL P. MALLOY, et al,

Defendants.

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:
:
:
:

Civil No. 3:13-cv-739-AVC

AFFIDAVIT

STATE OF CONNECTICUT)
)
COUNTY OF HARTFORD)

PETER OWENS, being duly sworn, hereby states the following under penalties of perjury.

1. I am over the age of 18 and believe in the nature of an oath.
2. I am submitting this affidavit in support of a motion for preliminary injunction filed by the plaintiffs herein.
3. I am a resident of the State of Connecticut, and a citizen of the United States. I have never been arrested or convicted of any crime. I currently possess a Permit To Carry Pistols and Revolvers issued by the State of Connecticut. This permit has never been suspended or revoked.
4. I am 33 years old. I live in Enfield, CT. I am currently employed at an outdoor outfitting company. I have worked in the outdoor outfitting industry for 5.5 years.
5. I currently own several different types of firearms. I own a Steyr M9A1 9 mm caliber semiautomatic handgun. I also own a Beretta 92 FS 9 mm caliber semiautomatic handgun. Both of these firearms were legally purchased.
6. I own several magazines that I use with these firearms. These magazines were legally purchased. However, none of these magazines hold ten rounds or less. I only possess magazines for these arms that hold more than ten (10) rounds of ammunition, and my firearms will not operate without magazines. I use these firearms to defend myself, my property and my home.

7. I am physically disabled. When I was four years old I suffered a stroke and lost the functional use of the left side of my body. As a result, I cannot use most of my left hand or arm.

8. On April 4, 2013, the Governor of Connecticut signed into law An Act Concerning Gun Violence Prevention and Children's Safety ("the Act"). With certain exceptions, the Act bans "large capacity magazines" (magazines that can accept more than 10 rounds of ammunition). I understand that, starting January 1, 2014, possession of a "large capacity magazine" is a Class D felony. If the "large capacity magazine" was obtained before the Act's passage, a first offense for possessing it is an infraction subject to a fine, but any subsequent offense is a Class D felony.

9. The Act bans "assault weapons," the definition of which includes a semiautomatic rifle that has an ability to accept a detachable magazine, and which also has: a folding or telescoping stock; or a thumbhole stock; or any other stock which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing; or a forward pistol grip.

10. The Act's definition of "assault weapon" also includes a semiautomatic pistol that has the ability to accept a detachable magazine, and which also has at least one of the following: an ability to accept a detachable magazine that attaches at some location outside the pistol grip; a threaded barrel capable of accepting a flash suppressor, forward pistol grip or silencer; a shroud that is attached to, or partially or completely encircles, the barrel and that permits the shooter to fire the firearm without being burned, except a slide that encloses the barrel; or a second hand grip.

11. I have been directly and adversely impacted by the passage and enforcement of the Act in several different ways.

12. I currently own magazines that can hold more than ten rounds of ammunition (hereinafter "Large Capacity Magazines," "LC mags"). These magazines were legally purchased. Under the Act, I must either declare possession of these magazines to the Department of Emergency Services and Public Protection, or otherwise divest myself of these magazines by no later than January 1, 2014. Should I fail to do this I face criminal prosecution, a possible felony conviction, and even jail time. The LC Mags that I (and thousands of other gun owners like me) have legally owned for years according to Connecticut law make me a criminal under the Act.

13. Semiautomatic pistols will not function without magazines. As noted, I only own magazines that hold more than ten rounds. My ability to use my pistols with my magazines exists only to the extent I declare possession thereof to the authorities and to the extent they do not wear out. The inability to use my firearms as designed and intended violates my fundamental constitutional right under the Second Amendment to use firearms to defend my loved ones, my property and my home.

14. As discussed above, I am physically disabled: I have no functional use of my left hand. My disability makes it extremely difficult to change magazines with ease or quickness. In order to change a magazine I must discard the spent magazine from my firearm, tuck the empty firearm under my left arm, pick up a new magazine with my right hand, insert the new magazine into the firearm and then continue firing. Since I cannot use my left hand, it takes me more time to exchange an empty magazine for a full one than it does an able-bodied shooter.

15. During a magazine change I am effectively unarmed, and the extended time I need to re-load my firearms increases my vulnerability to a criminal attacker advancing during the change. This vulnerability is eliminated by my ability to use a magazine that holds greater than ten rounds; the longer I am able to fire my gun in self-defense, the less exposed I am to the physical danger presented during re-loading. However, the Act's prohibition on LC mags only reinforces my vulnerability.

16. The Act's ban on firearms that have those physical characteristics that now qualify them as "assault weapons" has also had a direct and adverse impact on me.

17. The Act outlaws semi-automatic rifles that can accept detachable magazines, and also have a thumbhole stock, a telescoping stock, a forward grip, or any grip that permits the fingers of the trigger hand to rest below the firearm's action when firing.

18. These features (thumbhole stocks, telescoping stocks, forward grips, and grips that protrude below the action of the firearm) are safety and comfort features that permit me to shoot my guns more accurately.

19. I own an ASA 5.56 caliber AR-15 type modern sporting rifle. This firearm was legally purchased. This is a semi-automatic rifle that can accept a detachable magazine and also has a pistol grip and a forward grip.

20. The presence of a forward grip and a pistol grip that protrudes beneath my ASA rifle's action does not make my rifle more powerful or deadly. Given my disability, these grips provide me with increased grip stability and balance, and are the only devices that permit me to safely handle the firearm. They also provide me with sight-aligned accurate fire. The more consistent that my shooting eye is in relation to the line of the stock and barrel, the more accurate my shot placement will be. The forward / protruding grip also provides me with increased weapon retention. This is imperative, e.g., during a home invasion if assailant(s) attempt to disarm me in close quarters. The Act's outlawing the presence of forward / protruding grips on my ASA rifle does not reduce its lethality. Rather, it impedes my ability to properly aim my rifle. This increases the chances that I will fire my rifle inaccurately, thereby increasing the chances that I will miss my intended target, and hit an unintended one instead. It also impedes my ability to retain my rifle should someone try to take it from me. This increases the chances that my rifle will end up not with its rightful owner, but in the hands of an aggressor.

21. I understand that the Act defines a "large capacity magazine" as one that has the "capacity of, or can be readily restored or converted to accept, more than 10 rounds of ammunition." I further understand that the Act excludes from this definition magazines that

have “been permanently altered” so that they cannot accommodate more than ten rounds of ammunition and that are “permanently inoperable.”

22. I understand that if I wish to retain my grandfathered magazines, I must either declare my possession of them to the Department of Emergency Services and Protection, or otherwise “permanently” alter them so that they are inoperable or incapable of accepting more than ten rounds of ammunition.

23. I am not trained as a gunsmith. I do not know how to alter or modify an ammunition magazine. I do not have the experience, skill, tools, or parts that safe and responsible alterations or modifications require.

24. Even if I had the skill, experience, tools and parts to modify or alter an ammunition magazine, I still have no understanding of the means or methods of alteration or modification required by the Act, or what constitutes the “ready restoration,” “ready conversion,” or “permanent inoperability” of a magazine. These terms are not defined by the Act, and the State of Connecticut has not provided any guidance on what these phrases mean.

25. I am afraid that if I were to have an ammunition magazine altered or modified in a way that the State disapproved of, I would be criminally prosecuted or imprisoned. But I have no reasonable way of knowing which kinds of modifications or alterations the State deems legal.

26. I understand that the Act lists over 160 different models of firearms as “assault weapons.” The act outlaws “copies or duplicates” of 88 of these firearms, provided that they have the same “capability” of the listed rifle and “were in production prior to or on the effective date” of the Act. I also understand that the Act also defines 67 different kinds of “assault weapons” as “any combination of parts from which an assault weapon may be rapidly assembled.”

27. I am unfamiliar with many of the 88 different models of firearms the Act calls “assault weapons.” I have no way of knowing which ones may have been in production prior to or on the effective date of the Act, and I know of no source to research their production histories. I have no way of knowing what would be a “duplicate” or “copy” of a listed firearm, or what it means to have “the capability of any such” firearm, which may or may not refer to rate of fire, caliber, ballistics, range, durability, accuracy, barrel length, barrel diameter, sights, internal parts and operation (such as disconnector, firing pin, bolt, etc.), trigger pull, or some entirely different factor altogether.

28. I am unfamiliar with the individual parts or components that comprise the 67 different firearms the Act calls “assault weapons.” I don’t know which “combination of parts” could “rapidly be assembled” into a banned firearm.

29. I am afraid that if I were to obtain a firearm that is later determined to be a “duplicate or copy” of a banned firearm I would be criminally prosecuted or imprisoned. I am likewise afraid that I could possess a “combination” of illegal parts for which I could be prosecuted and jailed. But I have no reasonable way of knowing what the State deems to be an illegal

"duplicate" or "copy," what the term "capability" means, or which parts comprise so many different kinds of firearms.

30. On May 14th, 2013 I traveled to Hoffman's Gun Center and the Newington Gun Exchange, both located in Newington, CT. While there, I asked if it was possible to purchase a magazine that was capable of holding more than ten (10) rounds of ammunition. In response, I was told that this would be illegal.

31. As mentioned above, I currently own a Steyr handgun, which was originally equipped with a magazine that holds more than ten (10) rounds. While at the stores, I asked if there were any such magazines available for my Steyr handgun. In both locations I was told in response that LC mags for this handgun were not available for sale.

32. Also during my visit to the stores, I asked what AR-type rifles could or could not be legally sold. The salespersons advised me that, in their opinion, I could not legally buy any AR-15 type modern sporting rifle models.

33. Finally, during my visit to these stores, I asked if it was possible to purchase a Colt Sporter rifle, a Colt Match Target Rifle, a VEPR rifle in 7.62 x 54R with 5 round magazine, or an IZHMAISH Saiga 12 Shotgun with 2 round magazine. The dealer told me that I could not because these firearms were on a list of "banned" firearms.

34. I have reviewed the foregoing statements, and they are true, accurate and complete to the best of my knowledge, information and belief.

/s/ Peter W. Owens
PETER OWENS

Sworn to before me
this 25th day of JUNE, 2013.

Tiffany Drobot
NOTARY PUBLIC

TIFFANY DROBOT
NOTARY PUBLIC
My Commission Expires 8/31/2017

EXHIBIT I

Plaintiffs,

Civil No. 3:13-cv-739-AVC

AFFIDAVIT

Defendants.

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)

of perjury.

- purchased.

8. The Act bans "assault weapons," the definition of which includes a semiautomatic rifle that has an ability to accept a detachable magazine, and which also has: a folding or telescoping stock; or a thumbhole stock; or any other stock which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing; or a forward pistol grip.

9. I have been directly and adversely impacted by the passage and enforcement of the Act in several different ways.

10. I currently own a single firearm which only accepts magazines that hold less than ten rounds of ammunition. This severely limits my ability to defend myself in my home, as I am forced to re-load my firearm more often than I would be if I possessed a magazine that could hold more than ten rounds of ammunition.

11. During a magazine change I am effectively unarmed, and the time I need to re-load my firearm increases my vulnerability to a criminal attacker advancing during the change. This vulnerability is eliminated by my ability to use a magazine that holds greater than ten rounds: the longer I am able to fire my gun in self-defense, the less exposed I am to the physical danger presented during re-loading. However, the Act's prohibition on "large capacity magazines" only reinforces my vulnerability.

12. I understand that the Act lists over 160 different models of firearms as "assault weapons." The act outlaws "copies or duplicates" of 88 of these firearms, provided that they have the same "capability" of the listed rifle and "were in production prior to or on the effective date" of the Act. I also understand that the Act also defines 67 different kinds of "assault weapons" as "any combination of parts from which an assault weapon may be rapidly assembled."

13. I am unfamiliar with many of the 88 different models of firearms the Act calls "assault weapons." I have no way of knowing which ones may have been in production prior to or on the effective date of the Act, and I know of no source to research their production histories. I have no way of knowing what would be a "duplicate" or "copy" of a listed firearm, or what it means to have "the capability of any such" firearm, which may or may not refer to rate of fire, caliber, ballistics, range, durability, accuracy, barrel length, barrel diameter, sights, internal parts and operation (such as disconnector, firing pin, bolt, etc.), trigger pull, or some entirely different factor altogether. Because the meanings of these terms are so unclear, I am dissuaded from obtaining virtually any semiautomatic rifle.

14. I am unfamiliar with the individual parts or components that comprise the 67 different firearms the Act calls "assault weapons." I don't know which "combination of parts" could "rapidly be assembled" into a banned firearm.

15. I am afraid that if I were to obtain a firearm that is later determined to be a "duplicate or copy" of a banned firearm I would be criminally prosecuted or imprisoned. I am likewise afraid that I could possess a "combination" of illegal parts for which I could be prosecuted.

and jailed. But I have no reasonable way of knowing what the State deems to be an illegal "duplicate" or "copy," what the term "capability" means, or which parts comprise so many different kinds of firearms.

16. On June 10th, 2013 I traveled to Outpost Guns & Ammo Store located in Montville, CT. While there, I asked if it was possible to purchase a magazine that was capable of holding more than ten (10) rounds of ammunition. In response, I was told that this would be illegal.

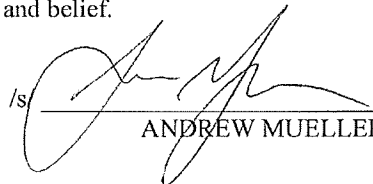
17. As mentioned above, I currently own a Ruger handgun, which was originally equipped with a magazine that holds less than ten (10) rounds. While at the store, I asked if there were any "large capacity" magazines available for my Ruger handgun. I was told in response that "large capacity magazines" for this handgun were not available for sale.

18. Also during my visit to the Outpost store, I asked what AR-type rifles could or could not be legally sold. The salesperson advised me that I could not legally buy any AR-15 type modern sporting rifle models.

19. Finally, during my visit to the Outpost store, I asked if it was possible to purchase a Colt Sporter rifle, a Colt Match Target Rifle, a VEPR rifle in 7.62 x 54R with 5 round magazine, or an IZHMAISH Saiga 12 Shotgun with 2 round magazine. The dealer told me that I could not because these firearms were on a list of "banned" firearms.

20. Were it not for the Act, I would promptly obtain a firearm that it defines as an "assault weapon" and a magazine that holds more than ten rounds of ammunition.

21. I have reviewed the foregoing statements, and they are true, accurate and complete to the best of my knowledge, information and belief.

/s/ 
ANDREW MUELLER

Sworn to before me
this 9th day of June, 2013.

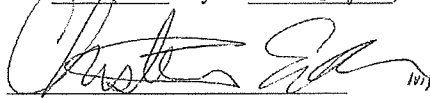

NOTARY PUBLIC
My Commission Expires
March 31, 2016

EXHIBIT J

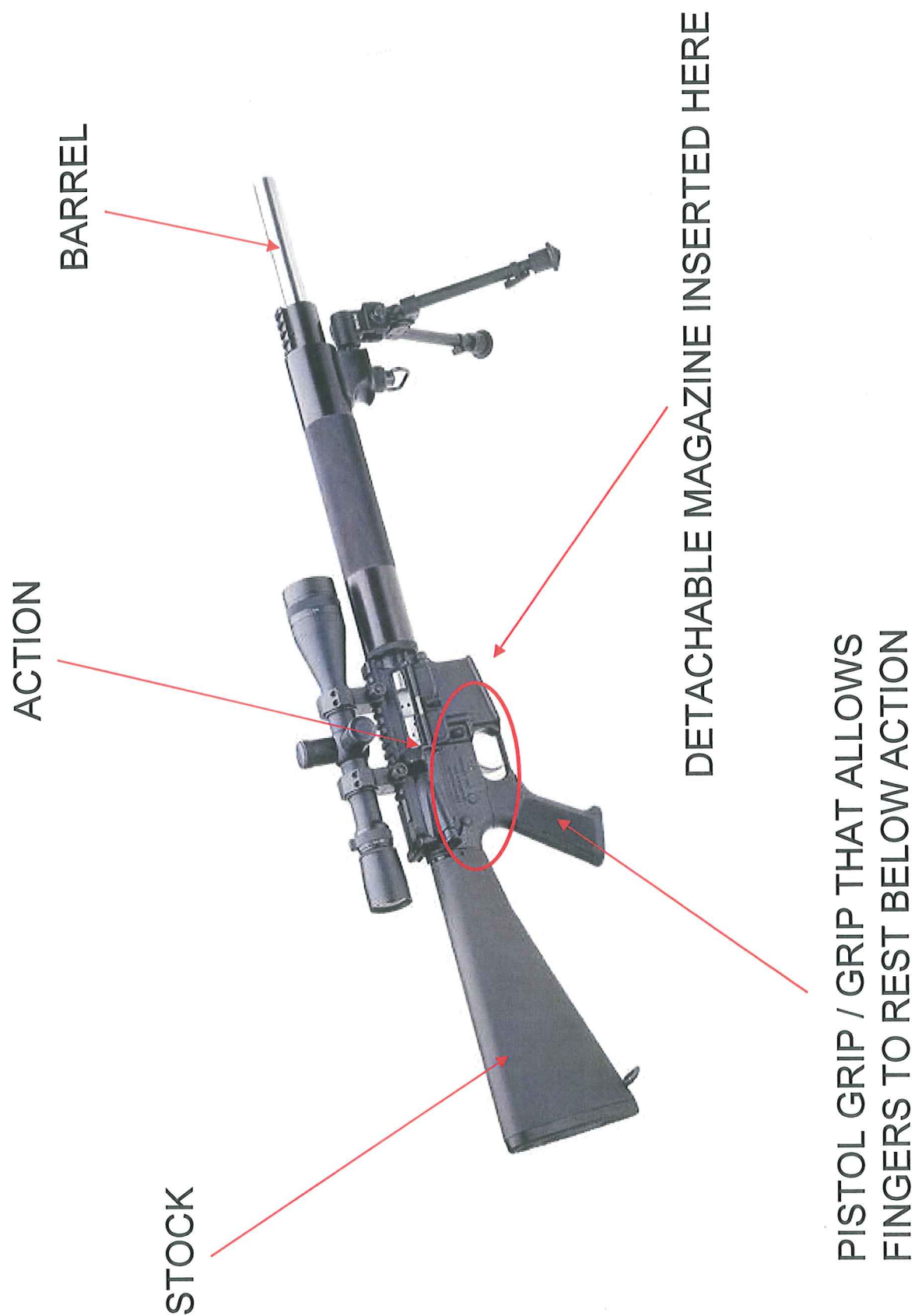


EXHIBIT K

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

JUNE SHEW, et al,)	
Plaintiffs,)	
)	
-against-)	Civil No. 3:13-cv-739-AVC
)	
DANNEL P. MALLOY, et al,)	
)	
Defendants.)	

DECLARATION OF GARY KLECK

I, Gary Kleck, do hereby swear or affirm:

I offer this declaration in support of a motion made by plaintiffs in the above-referenced action that seeks a preliminary injunction enjoining the enforcement of the Act Concerning Gun Violence Prevention and Children's Safety (Connecticut General Assembly Bill No. 1160, "the Act"). This declaration is based upon my review of the Act, the Complaint and First Amended Complaint filed by plaintiffs herein, and my years of study, training, research and teaching in Criminology and Criminal Justice; my education; and my experience.

I offer the following opinions under the penalties of perjury, and to a reasonable degree of certainty found in the fields of Criminology and Criminal Justice.

I. EXPERIENCE & TRAINING

I am a Professor of Criminology and Criminal Justice at Florida State University. During my years as a professor I have extensively researched and written about the subject of gun control, and am a nationally-recognized authority on violence and gun control. The term "gun control" has been used to describe firearm laws of all kinds, from prohibitions on criminal misuse of firearms to prohibitions on possession of firearms by law-abiding citizens. I have conducted numerous studies on the effects of guns on death and injury in crimes, and on suicides and gun accidents. I have also conducted studies on the impact of gun control laws on rates of violence, the frequency and effectiveness of defensive gun use by crime victims, patterns of gun ownership, why people support gun control, and gun trafficking.

I have published and presented extensively on the issues of guns, violence, and gun control. In 1994, I conducted the National Self-Defense Survey, a nationwide survey designed to estimate the prevalence of defensive gun use (DGU). During the survey my team and I used standard random digit dial (RDD) procedures to select a representative sample of telephone-owning U.S. households (over 95% of all U.S. households) to call. We then conducted telephone interviews with nearly 5,000 adults, asking about DGU. If the respondent (R) claimed to have had a DGU experience, we asked an extended series of follow-up questions to assess whether the experience actually qualified as a DGU (i.e., whether a crime was being committed against the victim, if there was a direct confrontation

between victim and offender, and if the victim used a gun to either threaten or attack the offender). We found that about 1.3% of the Rs had experienced a DGU in the preceding 12 months. Multiplying the U.S. adult population size by 1.3% yielded an estimate that in 1993 there were approximately 2.5 million incidents in which victims used guns for self-protection. As a point of comparison, there were about 0.5 million violent crimes committed that same year by offenders using guns, as estimated by the U.S. Census Bureau's National Crime Victimization Survey (Kleck and Gertz 1995).

I have also studied the effectiveness of defensive gun use, i.e. whether use of guns by crime victims increases or decreases their risk of being injured or losing property in a crime incident. That research indicated that victims who used guns for self-protection were less likely to suffer injury or property loss than otherwise similar victims who either did not resist or who used other self-protection strategies (Kleck 1988; Kleck and Sayles 1990; Kleck and DeLone 1993; Tark and Kleck 2004).

I have a Ph.D. in Sociology. I am the 1993 winner of the Michael J. Hindelang Award of the American Society of Criminology for my book *POINT BLANK: GUNS AND VIOLENCE IN AMERICA*, which made "the most outstanding contribution to criminology." I am also an Editorial Consultant for numerous publications including (among others) *Criminology*, *Homicide Studies*, *Violence and Victims*, *Social Problems* and *Journal of Research in Crime and Delinquency*.

II. THE CONNECTICUT ACT'S RESTRICTIONS ON MAGAZINE CAPACITY

The Act bans standard magazines that are in common use by classifying them as "large capacity magazines." These so-called "large capacity magazines" are generally defined by the Act to include devices "that ha[ve] the capacity of, or can be readily restored or converted to accept, more than 10 rounds of ammunition." CONN. GEN. STAT. § 53-202p(a)(1).

The Act's restriction on magazine capacity is unlikely to have any detectable effect on the number of homicides or violent acts committed with firearms. Further, criminals will be even less likely to be affected by the LC magazine restriction than noncriminals. It is law-abiding citizens who will primarily be impacted by the restriction.

A. The Act's Ten-Round Restriction Will Have An Inconsequential Effect On Criminal Behavior, But Will Reduce Law-Abiding Citizens' Ability To Adequately Defend Themselves, Their Families, and Their Property.

The Act's limitation of the capacity of magazines allowable for a firearm in the home impairs a homeowner's ability to successfully defend himself or herself during a criminal attack in the home. For a variety of reasons, the ten-round restriction will leave some homeowners unable to adequately protect themselves, their families, and their property.

1. Having Only Ten Rounds to Fire in a Situation of Lawful Self-Defense Will Be Insufficient In a Significant Share of Defensive Gun Use Situations.

Limiting magazine loading to ten rounds will impair a crime victim's ability to lawfully defend himself and others because: (a) some criminal attempts can only be stopped by shooting the offenders, (b) victims often face multiple criminal adversaries, and (c) people miss with most of the rounds they fire, even when trying to shoot their opponents.

In 2008, the National Crime Victimization survey indicated that 17.4% of violent crimes involved two or more offenders, and that nearly 800,000 violent crimes occurred in which the victim faced multiple offenders.¹

A reasonable upper limit on the marksmanship of lawful defenders using guns can be inferred from a review of the many detailed studies that have been done of shootings by police officers in which the officers were trying to shoot criminal adversaries. In many of these shootings, the officers fired large numbers of rounds. Yet, in 63% of the incidents, the officers failed to hit even a single offender with even a single round.² Police officers have the experience, training, and temperament to handle stressful, dangerous situations far better than the average civilian, so it is reasonable to assume that marksmanship among civilians using guns for self-protection will be still lower than that of police.

Some law-abiding citizens, along with many criminals, might invest in multiple ten-round magazines in the absence of larger capacity magazines – a development which would obviously defeat the purpose of the magazine capacity limit. Some crime victims, however, will not be able to make effective use of additional magazines. Under the intense emotional stress of a crime victimization, when the victim's hands are shaking, it will be impossible for some victims to eject the expended magazine and insert a new one quickly enough to make effective use of the second magazine. Further, elderly or physically handicapped persons may find it physically impossible for them to quickly change magazines.

2. The Restrictions on LC Magazines Will Have An Inconsequential Impact on Reducing Homicides and Violent Crimes.

Criminals rarely fire more than ten rounds in gun crimes. Indeed, they usually do not fire any at all – the gun is used only to threaten the victim, not to attack him or her.³ And when criminals do fire their weapons, they usually fire only a very few rounds. For example, in a sample of Philadelphia gun homicides, the average number of rounds fired was 2.7 for attacks committed with semiautomatic pistols and 2.1 for those with revolvers (McGonigal et al. 1993). For the vast majority of gun crimes, the unavailability of LC magazines would therefore be inconsequential in reducing criminal behavior.

¹ U.S. Bureau of Justice Statistics, 2013. BJS website at <http://bjs.gov/content/pub/pdf/cvus08.pdf>, Table 37.

² William A. Geller and Michael S. Scott, *Deadly Force: What We Know*, WASHINGTON, D.C. POLICE EXECUTIVE RESEARCH FORUM (1993).

³ Gary Kleck and Karen McElrath, *The Effects of Weaponry On Human Violence*, SOCIAL FORCES, 69(3):669-92 (1991).

Among the very small share of offenders who anticipated firing more than ten rounds, many could simply substitute one of the many illegal LC magazines that will continue to circulate even after being prohibited.⁴ Among criminals unwilling or unable to acquire such an unlawful LC magazine, the absence of an LC magazine would, as far as available evidence indicates, still make no difference, even in the very rare mass shooting incidents where offenders fire large numbers of rounds. This is because criminals can either (a) use multiple, smaller capacity magazines; or (b) simply bring multiple guns to the crime. Indeed, evidence on mass shootings indicates that these are precisely the adaptations adopted by most mass shooters.⁵ A study of all 15 mass shootings (those with more than six victims) that occurred in the U.S. between 1984 and 1993 found that the shooters had more than one gun in all but two of the incidents (Kleck 1997, p. 144). Thus, either using multiple magazines or multiple guns would allow a criminal to fire many rounds without using an LC magazine.

3. The Restrictions on LC Magazines Will Not Have A Significant Effect On The Number of Injured Victims or Deaths in a Mass Shooting.

A ban on LC magazines will have an inconsequential effect on reducing the number of killed or injured victims in mass shootings. It is erroneous to assume that an offender lacking LC magazines would be forced to reload sooner or more often, thereby giving bystanders the opportunity to tackle the shooter and stop his attacks. The window of opportunity for such heroic intervention closes rapidly: it takes two to four seconds for even a minimally experienced shooter to eject an expended magazine from a semi-automatic gun, insert a loaded magazine, and make the gun ready to fire. Thus, it is not surprising that victims and bystanders in mass shootings do not in fact tackle the shooters while they are reloading. I am aware of only one such incident in U.S. history – the Colin Ferguson shootings on a Long Island commuter train in 1993.⁶ Bystander intervention was feasible in that case only because of its unique location. Because train passengers could not exit the moving train car, they were forced to remain relatively close to the shooter, allowing them to quickly close the short distance between them and the shooter when he tried to switch magazines. (It is sometimes claimed that the man who attacked Congressman Gabrielle Giffords was stopped from further shooting by bystanders who tackled him while he was trying to reload, but this is false. The shooter had already stopped firing because the spring in his magazine had failed, and he was attempting to flee the scene when tackled by bystanders [New York Times January 10, 2011, p. A1]).

Another reason the unavailability of LC magazines would not create opportunities for bystander intervention in mass shootings is because most mass shooters bring multiple guns to the crimes and, therefore, can continue firing without reloading even after any one gun's ammunition is expended. A study of every large-scale mass shooting committed in the United States in the 10-year period from 1984 through 1993 found that the killers in 13

⁴ Gary Kleck, *Targeting Guns* (NY: Aldine de Gruyter, 1997).

⁵ Gary Kleck, *The Worst Possible Case For Gun Control: Mass Shootings in Schools*, AMERICAN BEHAVIORAL SCIENTIST, 52(10):1447-1464 (2009).

⁶ Gary Kleck, *Targeting Guns* (NY: Aldine de Gruyter, 1997).

of the 15 incidents possessed multiple guns – the Ferguson shooting being one of the two exceptions.⁷

III. THE SAFE ACT'S RESTRICTIONS ON STOCKS & GRIPS OF PISTOLS, RIFLES & SHOTGUNS

The Act significantly redefines the term “assault weapon” so as to criminalize features that are commonly found on rifles, pistols and shotguns. Transfer or possession of an “assault weapon” is a felony. Under the Act, the presence of the following features qualifies a firearm as an “assault weapon”:

Rifles

- i. A semiautomatic, centerfire rifle that has an ability to accept a detachable magazine and has at least one of the following:
 - I. A folding or telescoping stock;
 - II. Any grip of the weapon, including a pistol grip, a thumbhole stock, or any other stock, the use of which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing;
 - III. A forward pistol grip;
 - . . .
- ii. A semiautomatic, centerfire rifle that has a fixed magazine with the ability to accept more than ten rounds of ammunition; or
- iii. A semiautomatic, centerfire rifle that has an overall length of less than thirty inches....

Pistols

- iv. A semiautomatic pistol that has the ability to accept a detachable magazine and has at least one of the following:
 - I. An ability to accept a detachable magazine that attaches at some location outside the pistol grip; [or]
 - . . .
 - V. A semiautomatic pistol with a fixed magazine that has the ability to accept more than ten rounds.

⁷ Gary Kleck, *Targeting Guns* (NY: Aldine de Gruyter, 1997, p. 144).

Shotguns

- vi. A semiautomatic shotgun that has both of the following:
 - I. A folding or telescoping stock; and
 - II. Any grip of the weapon, including a pistol grip, a thumbhole stock, or any other stock, the use of which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing; or
- vii. A semiautomatic shotgun that has the ability to accept a detachable magazine.

See CONN. GEN. STAT. § 53-202a(1)(E).

The above definitions are restricted to “centerfire” firearms. An amendment to the Act would define “assault weapon” also to include rimfire firearms if they have two of the above listed features. § 3 of S.B. 1094. Firearms in .22 caliber rimfire are among the most popular nationwide and are primarily used for target shooting and hunting.

Restricting pistols, rifles and shotguns on the basis of these features is not rationally related to reducing gun violence. As explained in detail below, the restriction will make little difference in making the public safer from crimes committed with rifles and shotguns.

A. The Act’s “Assault Weapon” Ban Will Not Reduce Homicides Or Violent Crimes Or Improve Public Safety.

The restriction of rifles and shotguns on the basis of the features discussed above has no rational relation to the interest of reducing homicides and violent crimes. As with the ban on LC magazines, the “assault weapon” ban under the Act will not deter criminal behavior or mass shootings. The ban will, however, compromise law-abiding citizens’ ability to protect themselves, their families, and their property against criminals. Reducing gun availability among law-abiding citizens also reduces defensive gun uses that would otherwise save lives, prevent injuries, thwart rape attempts, drive off burglars, and help victims retain their property.

1. Criminals Can Use Non-Banned Firearms that Function The Same as The Banned Firearms Falling Within the “Assault Weapon” Definition Under The Act.

Under the Act, though some semi-automatic firearms are banned, other semi-automatic firearms are left legally available, including (a) unbanned models; (b) currently banned models that will be redesigned to remove military-style features (i.e., flash suppressor, bayonet lug, etc.) so as to render them non-Assault Weapons; and (c) firearms that would otherwise be banned as AWs but are grandfathered into lawful status because they were lawfully possessed on April 3, 2013. Thus, firearms will continue to be available that function in essentially identical ways as the banned firearms – i.e., they can accept detachable magazines (including LC magazines), can be fired just as fast, and can fire

rounds that are, shot-for-shot, just as lethal as rounds fired from the banned firearms. Consequently, criminals can substitute mechanically identical firearms for banned AWs, commit the same crimes they otherwise would have committed with the banned firearms, with the same number of wounded or killed victims. Powerfully motivated would-be mass shooters would be especially likely to do whatever it takes to acquire the weaponry needed to carry out their crimes, though there would be no reason why less powerfully motivated killers and other criminals could not likewise acquire such substitute weapons. Consequently, there is no sound a priori reason to believe the Act will reduce homicide or other violent crime, or improve public safety.⁸

2. The Expanded Definition of “Assault Weapon” And Ban Of Them Under the Act Will Have Little Effect On Crimes Committed With Firearms.

Criminals who do not currently possess or use banned AWs have no need to acquire substitute weapons because they will presumably simply continue to use the firearms they currently possess. For these criminals, the unavailability of AWs will make no difference one way or the other because they would not have used these banned firearms anyway. This category apparently encompasses virtually all criminals, since only about 2% or less of gun crimes are committed with AWs, as defined under the federal AW ban or previous state AW bans.⁹

The Act extends the definition of AW, but in some ways that are, as far as available evidence can determine, inconsequential with regard to their utility for inflicting criminal harm -- i.e., extending the prohibited class to include semi-automatic firearms with only one, rather than two as under prior law, feature, such as the type of stock or grip. Gun makers who want to continue selling firearms to Connecticut customers can easily convert semi-automatic firearms that are currently defined as AWs under the Act, due to their possession of these features, into lawful weapons, redesigning them to remove the offending features, without affecting their utility for criminal purposes. Thus, this broadening of the definition of AWs is not likely to make much difference in the AW share of firearms used in crime -- i.e., it is negligible and thus restrictions on availability of such firearms is likely to have a correspondingly tiny effect on public safety.

3. The Features Included In the Act’s One-Feature Test Make Rifles And Shotguns With Those Features More Useful For Legitimate Self-Defense and Sporting Activity Purposes, For The Same Reasons They Are Allegedly Useful for Criminal Purposes.

Other features of AWs *do* make them more useful for criminal purposes, such as their accuracy, lethality, rapid fire, or ability to fire many rounds without reloading. All of these features, however, also increase their utility for lawful self-defense or various sporting uses. Therefore, eliminating features that contribute to more effective self-defense will harm noncriminals who otherwise would make use of the features to save lives, prevent injury, or protect property.

⁸ Gary Kleck, *Targeting Guns* (NY: Aldine de Gruyter, 1997, pp. 110-128).

⁹ Gary Kleck, *Targeting Guns* (NY: Aldine de Gruyter, 1997, pp. 112-117, 141-143).

In self-defense situations where it is necessary for the crime victim to shoot the criminal in order to prevent harm to the defender or others, accuracy is obviously crucial to the victim's ability to avert harm. Any feature of a firearm that improves its accuracy thus makes it more effective for purposes of lawful self-defense. Likewise, greater accuracy obviously increases a firearm's utility for purposes of hunting, target shooting, and other sport uses of guns.

In situations where the victim faces multiple adversaries, the ability to fire many rounds without reloading is crucial for the ability of the victim to avert harm. It should be kept in mind that under the stressful circumstances of a crime, victims will not be able to hit their adversaries with every shot (or even most of the shots) they fire, so multiple rounds would often need to be fired at each of the criminals the victim faced before they stopped their criminal attempts.

Likewise, the ability to fire the weapon rapidly may be essential to either deter offenders from attacking or, failing that, to shoot those who cannot be deterred from attacking. This is so both because some of the defender's shots will miss, and because the offender(s) may not allow the victim much time to shoot before incapacitating the victim.

In self-defense situations where it is necessary to shoot the aggressor and only lethal or incapacitating injury will stop him, the lethality of the defender's firearm is likewise crucial to the crime victim's ability to stop the aggressor's criminal attack and avert harm to the defender and other potential victims. A firearm's lethality likewise aids in killing game animals in connection with hunting.

In sum, regardless of how an AW is defined, restricting firearms with the attributes that allegedly make them useful for criminal purposes will necessarily also restrict firearms possessing the attributes that make them more effective for purposes of lawful self-defense. Indeed, it is hard to even imagine an attribute of a firearm that makes it more useful for criminal purposes but does not also make it more useful for some lawful purpose, especially self-defense. Criminal acts of violence are different from lawful defensive acts of violence only with regard to the presence or absence of legal justification for the act, not with regard to the physical actions taken by the participants who use firearms.

4. The Act's Ban on Firearms Defined as an "Assault Weapon" Will Not Deter Criminals From Possessing and Using Them In Crimes or Finding Substitute Firearms With The Same Feature, but Will Simultaneously Deny Law-Abiding Citizens Access to Those Weapons to Defend Themselves.

While both criminals and prospective crime victims could substitute alternative weapons for banned "AWs," criminals are more likely to actually do so if necessary because they are more powerfully motivated to have deadly weapons. This would be especially true of the extremely rare mass shooters, who typically plan their crimes in advance and thus are in a position to take whatever time and effort is needed to acquire substitute weapons.¹⁰

¹⁰ Gary Kleck, *The Worst Possible Case For Gun Control: Mass Shootings in Schools*, AMERICAN BEHAVIORAL SCIENTIST, 52(10):1447-1464 (2009).

Further, even ordinary criminals are strongly motivated to acquire firearms both for purposes of committing crimes and for purposes of self-defense. Because criminals are victimized at a rate higher than noncriminals,¹¹ this means that they have even stronger self-defense motivations to acquire and retain guns than noncriminals. In contrast, many prospective crime victims do not face an imminent threat at the time they consider acquiring a gun for self-protection, have a weaker motivation to do whatever it takes to acquire their preferred type of firearm, and are therefore less likely to do so. In addition, as legally available firearms with the banned “military-style” features become more scarce, they will become more expensive and require more search time for law-abiding buyers to obtain them. Price is irrelevant to criminals who steal their guns, but higher prices will discourage some law-abiding citizens from acquiring the firearms they need for effective self-defense. Thus, the Act’s ban on these features is more likely to deny them to noncriminals who would use guns only for lawful purposes than to criminals who would use them to commit violent crimes.

It is virtually a tautology that criminals will disobey the AW ban at a higher rate than noncriminals. This means that noncriminals who desire either a firearm banned under the Act or a substitute gun will be less likely to acquire one than criminals. Consequently, the additional defensive value conferred by the attributes characteristic of the banned firearms will be denied to noncriminals at a higher rate than the crime-increasing effects of those attributes will be denied to criminals.

IV. THE ARBITRARY DISTINCTION BETWEEN MILITARY AND CIVILIAN CITIZENS

The Act prohibits ordinary civilians, including newcomers who move to Connecticut, from possessing “large capacity magazines” and “assault weapons,” other than those who possessed them by April 4, 2013, and who declare them by January 1, 2013. By contrast, a member of the military may acquire and possess such magazines at any time, even for personal use. Conn. Gen. Stat. § 53-202p(d)(3). Further, members of the military who move to Connecticut may declare possession of such firearm and magazine, and keep them. Conn. Gen. Stat. § 53-202d(d) (firearm), § 53-202p(d) (magazine).

This is an irrational discrimination that serves no purposes and is not based on documented differences in the risk of committing a crime with a gun. Quite the contrary, those with military experience are known to be at higher risk of committing murder and other violent crimes. Kleck and Hogan (1999) found that the odds of a military veteran committing murder were 2.7 times as high as for otherwise similar nonveterans. Likewise, spouse abuse is both more prevalent and more severe in military families than in civilian families (Rentz, Martin, Gibbs, Clinton-Sherrod, Hardison and Marshall 2006). Thus, allowing military persons who move to Connecticut to retain their previously owned “assault weapons” while forbidding nonmilitary persons from doing so is discriminatory in a way that has no rational relationship with improving public safety.

¹¹ Gary Kleck, *Targeting Guns* (NY: Aldine de Gruyter, 1997).

V. CONCLUSION

The Act's restrictions on LC magazines and broadening of the definition of banned AWs will have little or no impact on the number of homicides and violent acts committed with firearms. Law-abiding citizens will bear the brunt of the restriction on LC magazines and the broadened definition of "banned" AWs. The LC magazines restriction will not deter criminal behavior. Criminals rarely need large numbers of rounds to commit their crimes and, on the rare occasions when they do, will accomplish the same goal as using a LC magazine by using multiple, smaller capacity magazines or bringing multiple firearms to the crime. The ten-round restriction does, however, leave homeowners less able to adequately protect themselves, their families, and their property.

Criminals will similarly use pistols, rifles and shotguns that have the same function as those that the Act bans. Furthermore, the "unavailability" of AWs due to the Act will not deter criminals from committing crimes they intend to commit with equally lethal and accurate non-banned pistols, rifles and shotguns.

The Act's broadened definition of AWs is based on features that benefit criminals and law-abiding citizens equally. The same attributes that make pistols, rifles and shotguns with those features effective for criminal behavior also make them effective for self defense and sporting activities. Criminals will obey the Act at a lower rate than noncriminals, so, by banning pistols, rifles and shotguns with those features, the Act will impact law-abiding citizens' ability to defend themselves more than it will deter criminals from possessing and using those banned AWs.

I have reviewed the foregoing statements, and I hereby declare under the penalties of perjury that they are true, correct, complete and accurate according to the best of my knowledge, information, and belief.

Dated: June 25, 2013


DR. GARY KLECK

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EXHIBIT L

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

JUNE SHEW, et al,

Plaintiffs,

-against-

DANNEL P. MALLOY, et al,

Defendants.

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Civil No. 3:13-cv-739-AVC

DECLARATION

MICHELE DeLUCA hereby declares the following pursuant to 28 U.S.C. §1746 under penalties of perjury.

1. I am over the age of 18 and believe in the nature of an oath.
2. I am submitting this affidavit in support of a motion for preliminary injunction filed by the plaintiffs herein.
3. I am a resident of the State of Connecticut, and a citizen of the United States. I have never been arrested or convicted of any crime. I currently possess a permit to carry firearms issued by the State of Connecticut. This permit has never been suspended or revoked.
4. I am the General Manager and co-owner of MD Shooting Sports LLC located at 230 Roosevelt Drive in Monroe, CT. ("the Store"). The Store is the holder of a Federal Firearms License ("FFL") that permits it to buy, sell, import and manufacture firearms both within and without the State of Connecticut. Pursuant to this license, the Store buys, sells, and re-purchases firearms within and without the State of Connecticut. The Store sells ammunition, as well as magazines that hold ammunition. The Store also engages in the business of gunsmithing firearms.
5. The firearms sold by the Store include rifles, pistols and shotguns. Several models of these firearms are semi-automatic, and are capable of accepting detachable magazines. Several models are AR-15 type modern sporting rifles. Several of these same models also have characteristics such as pistol grips, forward grips, telescoping stocks, thumbhole stocks, and threaded barrels. Threaded barrels permit the firearm to accept popular accessories such as shrouds and flash hidiers.
6. On April 4, 2013, the Governor of Connecticut signed into law An Act Concerning Gun Violence Prevention and Children's Safety ("the Act"). Effective April 4, 2013, the Act bans the sale of "large capacity magazines" (i.e., magazines that can accept more than 10 rounds of ammunition). With certain exceptions, the Act bans the possession of "large capacity magazines." I understand that, starting January 1, 2014, possession of a "large capacity magazine" is a Class D felony. If the "large capacity magazine" was obtained before the Act's

passage, a first offense for possessing it is an infraction subject to a fine, but any subsequent offense is a Class D felony.

7. The Act bans "assault weapons," the definition of which includes a semiautomatic rifle that has an ability to accept a detachable magazine, and which also has: a folding or telescoping stock; or a thumbhole stock; or any other stock which would allow an individual to grip the weapon, resulting in any finger on the trigger hand in addition to the trigger finger being directly below any portion of the action of the weapon when firing; or a forward pistol grip.

8. Since the passage of the Act, the Store's business has been directly and adversely impacted. Prior to enactment of the Act, the Store typically did \$2,000-\$2,500 in business each weekday and \$5,000 to \$7,000 in business on Saturdays. After enactment of the Act, however, the Store is only generally earning about \$1,000 per weekday and \$2,000 to \$2,500 on Saturdays.

9. The loss in business threatens the financial viability of the Store and has caused me and my co-owner to consider relocating the Store out of state.

10. As mentioned above, the Act outlaws semi-automatic rifles that can accept detachable magazines, and also have a thumbhole stock, a telescoping stock, a forward grip, or any grip that permits the fingers of the trigger hand to rest below the firearm's action when firing. These features are commonly found (either individually or in combination) on AR-15 type modern sporting rifles.

11. Prior to enactment of the Act, one segment of the Store's business involved the purchase of "AR"-type firearms from out-of-state distributors and the sale of these "AR"-type firearms to customers. Since the passage of the Act, the Store's out-of-state distributors have stopped altogether the shipment of "AR"-type firearms to the Store due to concern and confusion over whether these types of arms can legally be shipped to, received by and/or sold by the holder of an FFL. These reductions and stoppages have caused actual harm to Store's sales and overall business.

12. One segment of the Store's business involves the sale of ammunition magazines. Since the passage of the Act, the Store's sales of magazines has declined significantly. This decline involves magazines that hold more than ten rounds and those that hold less than ten rounds. This decline has caused actual harm to the Store's sales and overall business.

13. One segment of the Store's business involves the receipt and transfer of firearms pursuant to the FFL the Store holds. Since the passage of the Act, the volume of firearms that the Store received and transfers has declined significantly. Before enactment of the Act, the Store regularly received 5-7 used firearms per week that would be resold. Now, however, the Store only receives 1-2 used firearms per week. This decline has caused actual harm to the Store's sales and overall business.

14. Since the passage of the Act, the Store's overall sales of rifles, pistols, and shotguns has declined significantly. I have observed that this decline in sales involves firearms that contain some of the individual features that are banned by the Act (e.g., pistol grips,

telescoping stocks, etc.), but also firearms that are not characterized by the Act as “assault weapons.” This decline is due, in large part, to customer confusion over which kinds of firearms are banned and which are not, as well as customer concern that purchasing a firearm will subject the customer to criminal prosecution.

15. In one recent incident, a customer who had come into the Store for the purchase of a bolt action rifle ultimately refused to make the purchase because he incorrectly believed that it was illegal under the Act.

16. Moreover, Connecticut law enforcement also appears to be confused over what is covered by the Act. For example, I personally spoke with a detective in the State Police Special Licensing and Firearms Unit in an effort to determine whether the Store could continue to sell Smith & Wesson AR-10 firearms in Connecticut after the enactment of the Act. While the detective told me that Smith & Wesson AR-10 firearms could continue to be sold in Connecticut, I later learned that this was simply incorrect.

17. There is also significant confusion on my behalf over which firearms can, and cannot, be sold according to the Act.

18. I understand that the Act lists over 160 different models of firearms as “assault weapons.” The act outlaws “copies or duplicates” of 88 of these firearms, provided that they have the same “capability” of the listed rifle and “were in production prior to or on the effective date” of the Act. I also understand that the Act also defines 67 different kinds of “assault weapons” as “any combination of parts from which an assault weapon may be rapidly assembled.”

19. I am unfamiliar with many of the 88 different models of firearms the Act calls “assault weapons.” I have no reasonable way of knowing which ones may have been in production prior to or on the effective date of the Act, and I know of no source to research their production histories. I have no reasonable way of knowing what would be a “duplicate” or “copy” of a listed firearm, or what it means to have “the capability of any such” firearm, which may or may not refer to rate of fire, caliber, ballistics, range, durability, accuracy, barrel length, barrel diameter, sights, internal parts and operation (such as disconnect, firing pin, bolt, etc.), trigger pull, or some entirely different factor altogether. Because the meanings of these terms are so unclear, I am dissuaded from selling virtually any semiautomatic rifle.

20. I am unfamiliar with each of the individual parts or components that comprise the 67 different firearms the Act calls “assault weapons.” I don’t know which “combination of parts” could “rapidly be assembled” into a banned firearm.

21. I am afraid that if I were to sell a firearm that is later determined to be a “duplicate or copy” of a banned firearm I would be criminally prosecuted or imprisoned. I am likewise afraid that I could sell a “combination” of illegal parts for which I could be prosecuted and jailed. But I have no reasonable way of knowing what the State deems to be an illegal “duplicate” or “copy,” what the term “capability” means, or which parts comprise so many different kinds of firearms.

22. I have reviewed a diagram of a rifle that is being submitted as an exhibit in support of the plaintiffs' Motion for Preliminary Injunction. The diagram depicts an AR-style firearm commonly known as a "varmint rifle." "Varmint rifles" are hunting rifles commonly used to shoot small game such as woodchucks, coyotes, prairie dogs, etc., at long range. Since the depicted hunting rifle is semi-automatic, can accept a detachable magazine, and has a pistol grip, it is now banned under the Act as an "assault weapon."

23. I have reviewed the foregoing statements, and declare pursuant to 28 U.S.C. §1746 they are true, accurate and complete to the best of my knowledge, information and belief.

/s/ 
MICHELE DeLUCA