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7 Attorneys for Defendants  
THE CITY OF SUNNYVALE, THE MAYOR OF  
8 SUNNYVALE, ANTHONY SPITALERI in his  
official capacity, THE CHIEF OF THE  
9 SUNNYVALE DEPARTMENT OF PUBLIC  
SAFETY, FRANK GRGURINA, in his official  
10 capacity

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN JOSE DIVISION  
14

15 LEONARD FYOCK,  
SCOTT HOCHSTETLER,  
16 WILLIAM DOUGLAS,  
DAVID PEARSON, BRAD SEIFERS, and  
17 ROD SWANSON,

18 Plaintiffs,

19 v.

20 THE CITY OF SUNNYVALE, THE  
MAYOR OF SUNNYVALE,  
21 ANTHONY SPITALERI in his official  
capacity, THE CHIEF OF THE  
22 SUNNYVALE DEPARTMENT OF  
PUBLIC SAFETY, FRANK GRGURINA,  
23 in his official capacity, and DOES 1-10

24 Defendants.

Case No. 13-cv-05807 RMW

**DECLARATION OF LUCY P. ALLEN IN  
SUPPORT OF SUNNYVALE'S OPPOSITION  
TO PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

Date: February 21, 2014  
Time: 9:00 a.m.  
Location: San Jose Courthouse  
Courtroom 6 – 4<sup>th</sup> Floor  
280 South 1<sup>st</sup> Street  
San Jose, CA 95113

25  
26 I, Lucy P. Allen, declare as follows:

27 1. I am a Senior Vice President of NERA Economic Consulting (“NERA”), a  
28 member of NERA’s Securities and Finance Practice and Chair of NERA’s Mass Torts and

1 Product Liability Practice. NERA provides practical economic advice related to highly complex  
 2 business and legal issues arising from competition, regulation, public policy, strategy, finance,  
 3 and litigation. NERA was established in 1961 and now employs approximately 500 people in  
 4 more than 20 offices worldwide.

5 2. In my 19 years at NERA, I have been engaged as an economic consultant or expert  
 6 witness in numerous projects involving economic and statistical analysis. I have been qualified as  
 7 an expert and testified in court on various economic and statistical issues relating to the flow of  
 8 guns into the criminal market. I have testified at trials in Federal District Court, before the New  
 9 York City Council Public Safety Committee, the American Arbitration Association and the  
 10 Judicial Arbitration Mediation Service, as well as in depositions.

11 3. I have a B.A. from Stanford University, an M.B.A. from Yale University, and  
 12 M.A. and M. Phil. degrees in Economics, also from Yale University. Prior to joining NERA, I  
 13 was an Economist for both President George H. W. Bush's and President Bill Clinton's Council  
 14 of Economic Advisers.

15 4. This declaration addresses the results of analyses that I and others under my  
 16 direction at NERA conducted with respect to the following issues: (a) the number of rounds of  
 17 ammunition fired by individuals using a gun in self-defense; and (b) magazines used in mass  
 18 shootings.

19 **A. Number of rounds fired by individuals in self-defense**

20 5. Plaintiffs claim the banned "large-capacity magazines" are commonly used in  
 21 Sunnyvale in the home for self-defense. The Complaint alleges that the "magazines prohibited by  
 22 the Ordinance are in widespread, common use throughout the United States" and that these  
 23 magazines, which are "capable of holding more than ten rounds [...] are currently possessed by  
 24 law-abiding citizens for the core lawful purpose of self-defense, including in-home self-defense."<sup>1</sup>  
 25

26 <sup>1</sup> Complaint, ¶2 and ¶42. The complaint also alleges that "the use of standard-capacity firearms  
 27 and magazines with capacities of more than ten rounds increase the likelihood that a law-abiding  
 28 citizen will survive a criminal attack." ¶49.

1           6.       Data from the NRA Institute for Legislative Action (“NRA-ILA”), however,  
2 indicates that it is rare for a person, when using a firearm in self-defense, to fire more than ten  
3 rounds.

4           7.       The NRA-ILA maintains a database of “armed citizen” stories describing private  
5 citizens who have successfully defended themselves, or others, using a firearm. A study of all  
6 incidents in this database over a 5-year period from 1997 through 2001 found that it is rare for  
7 individuals to defend themselves using more than ten rounds. Specifically, this study found that,  
8 on average, 2.2 shots were fired by defenders and that in 28% of incidents of armed citizens  
9 defending themselves the individuals fired no shots at all.<sup>2</sup>

10          8.       We performed a similar analysis of NRA-ILA stories for the 3-year period January  
11 2011 through December 2013. For each incident, the number of offenders, defenders, and shots  
12 fired were tabulated, along with the location, nature and outcome of the crime. The information  
13 was gathered for each incident from both the NRA-ILA synopsis and, where available, one  
14 additional news story.<sup>3</sup>

15          9.       According to this analysis, defenders fired on average 2.1 bullets. Out of 279  
16 incidents, there were no incidents in which the defender was reported to have fired more than 10  
17 bullets. In 16% of incidents, the defender did not fire any shots, and simply threatened the  
18 offender with a gun. For incidents occurring in the home (53% of total), defenders fired an  
19 average of 2.1 bullets, and fired no bullets in 12% of incidents in the home. The table below  
20 summarizes some of these findings.

21  
22  
23 \_\_\_\_\_  
24 <sup>2</sup> Claude Werner, “The Armed Citizen – A Five Year Analysis.”

25 <sup>3</sup> The following incidents were excluded from the analysis: (1) repeat stories (one incident listed  
26 multiple times on NRA website), (2) wild animal attacks, and (3) one incident where the  
27 supposed victim later pleaded guilty to covering up a murder. When the exact number of shots  
28 fired was not specified, we used the average for the most relevant incidents with known number  
of shots. For example, if the stories indicated that “shots were fired” this would indicate that at  
least two shots were fired and thus we used the average number of shots fired in all incidents in  
which two or more shots were fired and the number of shots was specified.

**Rounds Fired in Self-Defense  
Based on NRA-ILA Armed Citizen Stories  
January 2011 - December 2013**

	<u>Rounds Fired by Individual in Self-Defense</u>	
	<u>Overall</u>	<u>Incidents In Home</u>
Average Shots Fired	2.1	2.1
Number of Incidents with No Shots Fired	44	17
Percent of Incidents with No Shots Fired	15.8%	11.5%
Number of Incidents with >10 Shots Fired	0	0
Percent of Incidents with >10 Shots Fired	0.0%	0.0%

**Notes and Sources:**

Events from NRA-ILA Armed Citizen database covering 279 incidents from January 1, 2011 through December 31, 2013. Excludes repeat stories, wild animal attacks, and one incident where the supposed victim later pleaded guilty to covering up a murder.

**B. Mass shootings**

**1. Use of large-capacity magazines in mass shootings**

10. We found two comprehensive sources detailing historical mass shootings: 1) “US Mass Shootings, 1982-2012: Data From Mother Jones’ Investigation” published by Mother Jones and 2) “Mass Shooting Incidents in America (1984-2012)” published by the Citizens Crime Commission of New York City. See attached Table 1 for a summary of the combined data.

11. The definition of mass shooting and the period covered differed somewhat for each of the sources. Mother Jones covers 67 mass shootings from 1982 to 2013. Mother Jones includes mass shootings in which a shooter killed four or more people in one incident in a public place and excludes crimes involving armed robbery or gang violence.<sup>4</sup> Citizens Crime Commission covers 30 mass shootings from 1984 to 2012. Citizens Crime Commission includes mass shootings in which a shooter killed four or more people and the gun used by the shooter had

<sup>4</sup> “What Exactly is a Mass Shooting,” Mother Jones, August 24, 2012. <http://www.motherjones.com/mojo/2012/08/what-is-a-mass-shooting>. Two incidents included in the Mother Jones data (Columbine High School and Westside Middle School) involved two shooters. “A Guide to Mass Shootings in America,” Mother Jones, February 27, 2013.

1 a magazine with capacity greater than ten.<sup>5</sup> We updated the data on shots fired for mass  
2 shootings in 2013 where available.

3 12. Based on the combined data we found that large-capacity magazines (those with a  
4 capacity to hold more than 10 rounds of ammunition) are often used in mass shootings. Such  
5 large-capacity magazines were used in the majority of the mass shootings with known magazine  
6 capacity since 1982 (34 out of 40 mass shootings).<sup>6</sup> In the past two years, large-capacity  
7 magazines were used in five of the seven mass shootings with known magazine capacity.<sup>7</sup>

8 13. The data indicates that it is common for offenders to fire more than ten rounds  
9 when using a gun with a large-capacity magazine in mass shootings. In particular, in mass  
10 shootings that involved use of large-capacity magazine guns, the average number of shots fired  
11 was 75.<sup>8</sup>

12 **2. Casualties in mass shootings with large-capacity magazine guns compared**  
13 **with other mass shootings**

14 14. Based on our analysis of the combined mass shootings data in the past 30 years,  
15 casualties were higher in the mass shootings that involved large-capacity magazine guns than in  
16 other mass shootings. In particular, we found an average number of fatalities or injuries of 22 per  
17 mass shooting with a large-capacity magazine versus 9 for those without.<sup>9</sup>

18 <sup>5</sup> “Mass Shooting Incidents in America (1984-2012),” Citizens Crime Commission of New York  
19 City. <http://www.nycrimecommission.org/mass-shooting-incidents-america.php>

20 <sup>6</sup> For many of the mass shootings, the data does not indicate whether a large-capacity magazine is  
21 used. Based only on Mother Jones data, large capacity magazines were used in 32 out of 38 mass  
22 shootings with known magazine capacity.

23 <sup>7</sup> There were five additional mass shootings in which the magazine capacity was unknown.

24 <sup>8</sup> There were 27 mass shootings, in which the magazine capacity and the number of shots fired  
25 were known.

26 <sup>9</sup> A 2013 study by Mayors Against Illegal Guns similarly found that when mass shootings  
27 involved assault weapons or high capacity magazine, the number of deaths was higher. The study  
28 was based on data from the FBI and media reports covering the period January 2009 through  
January 2013. The study found that mass shootings where assault weapons or high-capacity  
magazines were used resulted in an average of 14.4 people shot and 7.8 deaths versus other mass  
shootings that resulted in 5.7 people shot and 4.8 deaths. *Analysis of Recent Mass Shootings*,  
Mayors Against Illegal Guns, September, 2013.

1           **3. Mass shootings with only one gun and large capacity magazines**

2           15. In his declaration filed in this matter, plaintiffs' expert Dr. Gary Kleck implies that  
3 killers in mass shootings are unlikely to have only one gun with a large-capacity magazine, and  
4 that thus, the ban would not prevent mass shootings because shooters could use multiple guns.<sup>10</sup>

5           16. Dr. Kleck states that there has not been "a single mass shooting in which the  
6 offender used a LCM [large capacity magazine], and was known to have possessed just one gun  
7 and just one magazine in his immediate possession."<sup>11</sup> Dr. Kleck's statement is misleading  
8 because his list of mass shootings includes a number of incidents with missing data. There are 11  
9 mass shootings in Dr. Kleck's data, or 20% of the incidents, for which there is not enough data to  
10 make such a conclusion. In other words, according to Dr. Kleck's data in 20% of these incidents  
11 it is possible that a large capacity magazine, one gun, and one magazine was used.

12           17. Moreover, based on our analysis of the combined mass shootings data in the past  
13 30 years, there have been 34 incidents (85% of the 40 mass shootings with known magazine  
14 capacity) in which the shooter used a large capacity magazine. There have been 28 incidents  
15 (41% of the 69 mass shootings) in which the shooter had only one gun. There were 14 incidents  
16 (35% of the 40 mass shootings with known magazine capacity) where the shooter had only one  
17 gun and used a large capacity magazine. An average of 14 people were killed or injured in each  
18 of these 14 mass shootings.<sup>12</sup>

19           **4. Percent of mass shooters' guns legally obtained**

20           18. The combined data on mass shootings indicates that the majority of guns used in  
21 mass shootings were obtained legally. Shooters in almost 78% of mass shootings in the past 30  
22

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23 <sup>10</sup> Declaration of Gary Kleck, December 23, 2013, ¶14.

24 <sup>11</sup> Declaration of Gary Kleck, December 23, 2013, ¶14.

25 <sup>12</sup> An analysis of only the mass shootings identified by Mother Jones yielded similar results: 1)  
26 Large capacity magazines were used in 32 out of the 38 mass shootings with known magazine  
27 capacity; 2) The shooter had only one gun in 26 out of the 67 mass shootings; 3) The shooter had  
28 only one gun and used a large capacity magazine in 12 of the 38 shootings with known magazine  
capacity. An average of 15 people were killed or injured during these 12 mass shootings.

1 years obtained their guns legally (at least 54 of the 69 mass shootings) and 75% of the guns used  
2 in these 69 mass shootings were obtained legally (at least 115 of the 153 guns).<sup>13</sup>

3 I declare under penalty of perjury under the laws of the State of California that the  
4 foregoing is true and correct to the best of my knowledge. Executed this 29<sup>th</sup> day of January,  
5 2014, in New York, NY.

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10 Lucy P. Allen  
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27 <sup>13</sup> Based on data from "US Mass Shootings, 1982-2012: Data from Mother Jones' Investigation"  
28 published by Mother Jones. <http://www.motherjones.com/politics/2012/12/mass-shootings-mother-jones-full-data>

**Table 1: Combined Mass Shootings Data  
1982 - 2013**

Case	Location	Date	Source	Large-Capacity Magazine <sup>1</sup>		Fatalities <sup>2</sup>		Injuries <sup>2</sup>		Shots Fired	Obtained Legally?	Offenders' Number of Guns
				MJ/NE	CC	MJ	CC	MJ	CC	CC	MJ	MJ
1 Washington Navy Yard	Washington D.C.	9/16/2013	MJ	-	-	13	-	8	-	-	Yes	2
2 Hialeah	Hialeah, Florida	7/26/2013	MJ	-	-	7	-	0	-	10 <sup>3</sup>	Yes	1
3 Santa Monica	Santa Monica, California	6/7/2013	MJ	Yes	-	6	-	3	-	70 <sup>4</sup>	Yes	2
4 Federal Way	Federal Way, Washington	4/21/2013	MJ	-	-	5	-	0	-	-	Yes	2
5 Upstate New York	Herkimer, New York	3/13/2013	MJ	No	-	5	-	2	-	-	Yes	1
6 Newtown school	Newtown, Connecticut	12/14/2012	MJ/CC	Yes	Yes	28	28	2	-	154	Stolen	4
7 Accent Signage Systems	Minneapolis, Minnesota	9/27/2012	MJ	Yes	-	7	-	1	-	-	Yes	1
8 Sikh temple	Oak Creek, Wisconsin	8/5/2012	MJ/CC	Yes	Yes	7	7	3	3	-	Yes	1
9 Aurora theater	Aurora, Colorado	7/20/2012	MJ/CC	Yes	Yes	12	12	58	58	70	Yes	4
10 Seattle cafe	Seattle, Washington	5/30/2012	MJ	-	-	6	-	1	-	-	Yes	2
11 Oikos University	Oakland, California	4/2/2012	MJ	No	-	7	-	3	-	-	Yes	1
12 Su Jung Health Sauna	Norcross, Georgia	2/22/2012	MJ	-	-	5	-	0	-	-	Yes	1
13 Seal Beach	Seal Beach, California	10/14/2011	MJ	-	-	8	-	1	-	-	Yes	3
14 IHOP	Carson City, Nevada	9/6/2011	MJ/CC	Yes	Yes	5	5	7	7	-	Yes	3
15 Grand Rapids Shooting	Grand Rapids, Michigan	7/7/2011	CC	-	Yes	-	8	-	2	10	No	1
16 Tucson	Tucson, Arizona	1/8/2011	MJ/CC	Yes	Yes	6	6	13	13	33	Yes	1
17 Hartford Beer Distributor	Manchester, Connecticut	8/3/2010	MJ/CC	Yes	Yes	9	9	2	2	11	Yes	2
18 Coffee shop police killings	Parkland, Washington	11/29/2009	MJ	-	-	4	-	1	-	-	Stolen	2
19 Fort Hood	Fort Hood, Texas	11/5/2009	MJ/CC	Yes	Yes	13	13	30	30	214	Yes	1
20 Binghamton	Binghamton, New York	4/3/2009	MJ/CC	Yes	Yes	14	14	4	4	99	Yes	2
21 Carthage nursing home	Carthage, North Carolina	3/29/2009	MJ	No	-	8	-	3	-	-	Yes	2
22 Atlantis Plastics	Henderson, Kentucky	6/25/2008	MJ	-	-	6	-	1	-	-	Yes	1
23 Northern Illinois University	DeKalb, Illinois	2/14/2008	MJ/CC	Yes	Yes	6	6	21	21	54	Yes	4
24 Kirkwood City Council	Kirkwood, Missouri	2/7/2008	MJ	-	-	6	-	2	-	-	Stolen	2
25 Westroads Mall	Omaha, Nebraska	12/5/2007	MJ/CC	Yes	Yes	9	9	4	5	14	Stolen	1
26 Crandon	Crandon, Wisconsin	10/7/2007	MJ	-	-	6	-	1	-	-	Yes	1
27 Virginia Tech	Blacksburg, Virginia	4/16/2007	MJ/CC	Yes	Yes	33	33	23	17	176	Yes	2
28 Trolley Square	Salt Lake City, Utah	2/12/2007	MJ	No	-	6	-	4	-	-	No	2
29 Amish school	Lancaster County, Pennsylvania	10/2/2006	MJ	-	-	6	-	5	-	-	Yes	3
30 Capitol Hill	Seattle, Washington	3/25/2006	MJ	-	-	7	-	2	-	-	Yes	4
31 Goleta postal	Goleta, California	1/30/2006	MJ	Yes	-	8	-	0	-	-	Yes	1
32 Red Lake	Red Lake, Minnesota	3/21/2005	MJ	-	-	10	-	5	-	-	Stolen	3
33 Living Church of God	Brookfield, Wisconsin	3/12/2005	MJ	-	-	7	-	4	-	-	Yes	1
34 Damageplan show	Columbus, Ohio	12/8/2004	MJ	-	-	5	-	7	-	-	Yes	1
35 Hunting Camp	Meteor, Wisconsin	11/21/2004	CC	-	Yes	-	6	-	3	20	-	1
36 Lockheed Martin	Meridian, Mississippi	7/8/2003	MJ	-	-	7	-	8	-	-	Yes	5

**Table 1: Combined Mass Shootings Data  
1982 - 2013**

Case	Location	Date	Source	Large-Capacity Magazine <sup>1</sup>		Fatalities <sup>2</sup>		Injuries <sup>2</sup>		Shots Fired	Obtained Legally?	Offenders' Number of Guns
				MJ/NE	CC	MJ	CC	MJ	CC	CC	MJ	MJ
37 Navistar	Melrose Park, Illinois	2/5/2001	MJ	-	-	5	-	4	-	-	Yes	4
38 Wakefield	Wakefield, Massachusetts	12/26/2000	MJ/CC	Yes	Yes	7	7	0	0	37	Yes	3
39 Hotel	Tampa, Florida	12/30/1999	MJ	-	-	5	-	3	-	-	Yes	2
40 Xerox	Honolulu, Hawaii	11/2/1999	MJ/CC	Yes	Yes	7	7	0	0	28	Yes	1
41 Wedgwood Baptist Church	Fort Worth, Texas	9/15/1999	MJ/CC	Yes	Yes	8	8	7	7	30	Yes	2
42 Atlanta day trading spree	Atlanta, Georgia	7/29/1999	MJ	-	-	9	-	13	-	-	Yes	4
43 Columbine High School	Littleton, Colorado	4/20/1999	MJ/CC	Yes	Yes	15	15	24	23	188	No	4
44 Thurston High School	Springfield, Oregon	5/21/1998	MJ/CC	Yes	Yes	4	4	25	25	50	No	3
45 Westside Middle School	Jonesboro, Arkansas	3/24/1998	MJ/CC	Yes	Yes	5	5	10	10	26	Stolen	9
46 Connecticut Lottery	Newington, Connecticut	3/6/1998	MJ/CC	Yes	Yes	5	5	1	0	5	Yes	1
47 Caltrans maintenance yard	Orange, California	12/18/1997	MJ/CC	Yes	Yes	5	5	2	2	144	Yes	1
48 R.E. Phelon Company	Aiken, South Carolina	9/15/1997	MJ	-	-	4	-	3	-	-	No	1
49 Fort Lauderdale revenge	Fort Lauderdale, Florida	2/9/1996	MJ	-	-	6	-	1	-	-	Yes	2
50 Walter Rossler Company	Corpus Christi, Texas	4/3/1995	MJ	-	-	6	-	0	-	-	Yes	2
51 Air Force base	Fairchild Air Force Base, Washington	6/20/1994	MJ/CC	Yes	Yes	5	6	23	23	-	Yes	1
52 Chuck E. Cheese	Aurora, Colorado	12/14/1993	MJ	-	-	4	-	1	-	-	-	1
53 Long Island Rail Road	Garden City, New York	12/7/1993	MJ/CC	Yes	Yes	6	6	19	19	30	Yes	1
54 Luigi's	Fayetteville, North Carolina	8/6/1993	MJ	-	-	4	-	8	-	-	Yes	3
55 101 California Street	San Francisco, California	7/1/1993	MJ/CC	Yes	Yes	9	9	6	6	75	No	3
56 Watkins Glen	Watkins Glen, New York	10/15/1992	MJ	-	-	5	-	0	-	-	Yes	1
57 Lindhurst High School	Olivehurst, California	5/1/1992	MJ	-	-	4	-	10	-	-	Yes	2
58 Royal Oak postal	Royal Oak, Michigan	11/14/1991	MJ	-	-	5	-	5	-	-	Yes	1
59 University of Iowa	Iowa City, Iowa	11/1/1991	MJ	No	-	6	-	1	-	-	Yes	1
60 Luby's	Killeen, Texas	10/16/1991	MJ/CC	Yes	Yes	24	24	20	20	100	Yes	2
61 GMAC	Jacksonville, Florida	6/18/1990	MJ/CC	Yes	Yes	10	10	4	4	14	Yes	2
62 Standard Gravure	Louisville, Kentucky	9/14/1989	MJ/CC	Yes	Yes	9	9	12	12	21	Yes	5
63 Stockton schoolyard	Stockton, California	1/17/1989	MJ/CC	Yes	Yes	6	6	29	30	106	Yes	2
64 ESL	Sunnyvale, California	2/16/1988	MJ	-	-	7	-	4	-	-	Yes	7
65 Shopping centers	Palm Bay, Florida	4/23/1987	MJ	Yes	-	6	-	14	-	-	Yes	3
66 United States Postal Service	Edmond, Oklahoma	8/20/1986	MJ	-	-	15	-	6	-	-	Yes	3
67 San Ysidro McDonald's	San Ysidro, California	7/18/1984	MJ/CC	Yes	Yes	22	22	19	19	257	Yes	3
68 Dallas nightclub	Dallas, Texas	6/29/1984	MJ/CC	Yes	Yes	6	6	1	1	-	No	1
69 Welding shop	Miami, Florida	8/20/1982	MJ	No	-	8	-	3	-	-	Yes	1
Average:						8.2	10.3	7.6	12.6	73.1		
Large-Capacity Magazine Average:						10.1	10.3	12.1	12.6	75.4		
Non Large-Capacity Magazine Average:						6.7	-	2.7	-	-		

**Table 1: Combined Mass Shootings Data  
1982 - 2013**

Case	Location	Date	Source	Large-Capacity Magazine <sup>1</sup>		Fatalities <sup>2</sup>		Injuries <sup>2</sup>		Shots Fired	Obtained Legally?	Offenders' Number of Guns
				MJ/NE	CC	MJ	CC	MJ	CC	CC	MJ	MJ

**Notes and Sources:**

MJ represents Mother Jones data. CC represents Citizens Crime Commission of New York City data. NE represents NERA data. "-" means unspecified.

Mother Jones mass shootings data: "US Mass Shootings, 1982, 2012: Data from Mother Jones' Investigation," Mother Jones, December 28, 2012.

Mother Jones high capacity magazine data: "More Than Half of Mass Shooters Used Assault Weapons and High-Capacity Magazines," Mother Jones, February 27, 2013.

Citizens Crime Commission data from: "Citizens Crime Commission of New York City, Mass Shooting Incidents in America (1984-2012).

<sup>1</sup> Large-capacity magazines are those with a capacity to hold more than 10 rounds of ammunition.

<sup>2</sup> Offender included in counts of fatalities and injuries.

<sup>3</sup> Shots fired: "Shooter Set \$10,000 on Fire in Hialeah Shooting Rampage," NBC News, July 28, 2013.

<sup>4</sup> Shots fired: "Santa Monica shooter was 'ready for battle'; At least 70 rounds fired at students," The Malibu Times, June 8, 2013.