

No. 23-55367

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

LANA RAE RENNA, et al.,
Plaintiffs-Appellees,

v.

ROB BONTA, in his official capacity as Attorney General of California; and
ALISON MENDOZA, in her official capacity as Director of the Department of Justice
Bureau of Firearms,
Defendants-Appellants.

**On Appeal from the United States District Court
for the Southern District of California**
No. 3:20-cv-02190-DMS-DEB
The Honorable Dana M. Sabraw, Judge

**EXCERPTS OF RECORD
INDEX VOLUME**

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VOLUME 1 OF 3**

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

LANA RAE RENNA, et al.,

Plaintiffs,

v.

ROBERT BONTA, Attorney General of
California; and ALLISON MENDOZA,
Director of the California Department of
Justice Bureau of Firearms,

Defendants.

Case No.: 20-cv-2190-DMS-DEB

**AMENDED ORDER GRANTING IN
PART AND DENYING IN PART
PLAINTIFFS’ MOTION FOR
PRELIMINARY INJUNCTION**

Plaintiffs seek to enjoin enforcement of California’s handgun “roster” requirements, which have prohibited the manufacture and retail sale in California of a large segment of modern handguns that are otherwise in common use throughout the United States for self-defense and other lawful purposes. The challenged roster requirements are codified in California’s Unsafe Handgun Act (“UHA”) and limit handgun manufacturing and retail sales to those handguns that can satisfy numerous testing and safety feature requirements not required in 47 other states. As a result, Plaintiffs allege no modern handguns have been added to the roster’s list and approved for commercial sale in more than a decade, and the limited number of handguns currently listed on the roster and available for sale continues to shrink because of the testing and safety feature requirements as well as the assessment

1 of annual roster fees on manufacturers as a condition to retention of their handguns on the
2 roster. Plaintiffs further allege the roster will shrink at an accelerated pace in the future
3 because of the UHA’s “three-for-one” roster removal provision, which mandates that for
4 each new roster-compliant handgun added to the roster, three “grandfathered” handguns
5 must be removed in reverse order of their dates of admission to the roster.

6 Plaintiffs argue these roster requirements “all operate together” to ban the retail sale
7 of hundreds of modern “off-roster” handguns in common use and violate their rights to
8 “keep and bear arms” secured by the Second Amendment to the United States Constitution.
9 Despite Plaintiffs’ request to enjoin the entirety of the UHA’s roster requirements, their
10 focus has been on three specific requirements of the UHA and the impact of those
11 requirements on a particular type of handgun: semiautomatic pistols. These types of
12 handguns have been banned from commercial sale in California because they lack three
13 features required by the UHA. Two of the mandated features became effective in 2007
14 and require that these arms have a chamber load indicator and magazine disconnect
15 mechanism, both of which are designed to prevent accidental discharges and increase gun
16 safety. The third requirement, microstamping, became effective in 2013 and is intended to
17 help law enforcement solve gun-related crimes by allowing quick identification of the
18 handgun used at a crime scene from information imprinted on spent cartridge casings.
19 Defendants argue the California Legislature passed these requirements to further important
20 state interests: gun safety, and general public safety through enhanced criminal
21 investigations.

22 While the topic of gun regulation and its permissible scope is hotly debated in
23 America’s political theater, the role of this Court is to determine whether the roster
24 provisions of the UHA violate Plaintiffs’ Second Amendment rights under United States
25 Supreme Court precedent in *New York State Rifle & Pistol Ass’n v. Bruen*, 142 S. Ct. 2111
26 (2022). *Bruen* abrogated the “means-end” approach used by circuit courts across the
27 country to determine the constitutionality of gun regulations under the Second
28 Amendment, including a Ninth Circuit decision that previously upheld the UHA’s chamber

1 load indicator, magazine disconnect mechanism, and microstamping requirements. *See*
2 *Pena v. Lindley*, 898 F.3d 969 (9th Cir. 2018). Under *Bruen*, when the Second
3 Amendment’s plain text covers an individual’s conduct, the Constitution presumptively
4 protects that conduct, in which case the State “may not simply posit that the regulation
5 promotes an important interest,” such as public safety. 142 S. Ct. at 2126. Rather, to justify
6 its regulation, the State must demonstrate that the regulation is consistent with this Nation’s
7 historical traditions of firearm regulations. *Id.*

8 Under this newly formulated standard, the Court concludes that Plaintiffs’ desire to
9 commercially purchase newer models of semiautomatic handguns in common use is
10 covered by the Second Amendment and presumptively protected. Because the State is
11 unable to show the UHA’s chamber load indicator, magazine disconnect mechanism, and
12 microstamping requirements are consistent with the Nation’s historical arms regulations,
13 Plaintiffs are entitled to a preliminary injunction against the State’s enforcement of those
14 three provisions, which operate to prohibit the commercial sale of these arms, as well as
15 the three-for-one roster removal provision, which depends on the enforceability of those
16 provisions. However, Plaintiffs have not met their burden to show that the UHA’s roster
17 listing requirement, fees, and other safety and testing requirements, all of which became
18 effective in 1999, themselves or in combination with other requirements of the UHA
19 operate to effect a sales ban or violate Plaintiffs’ Second Amendment rights. Plaintiffs’
20 motion for preliminary injunction is therefore granted in part and denied in part.

21 I.

22 BACKGROUND

23 A. California’s Unsafe Handgun Act

24 The UHA regulates the commercial sale of handguns by requiring the California
25 Department of Justice (“CDOJ”) to maintain a “roster” listing all handguns that have been
26 tested by a certified testing laboratory, “have been determined to be *not* unsafe handguns,”
27 and may be lawfully manufactured and sold by licensed firearms dealers in California. Cal.
28 Penal Code § 32015(a) (emphasis added). Under the UHA, all handguns are considered

1 “unsafe” and may not be commercially sold in California unless the CDOJ determines them
2 “not to be unsafe” and authorizes their inclusion on the roster. Manufacturing or selling
3 an “unsafe” handgun, i.e., an “off-roster” handgun, is a violation of the UHA and subjects
4 the offender to misdemeanor criminal and civil penalties, including up to one year
5 imprisonment and fines up to \$10,000. *Id.* § 32000(a)(1)-(3).

6 An “unsafe handgun” is defined as “any pistol, revolver, or other firearm capable of
7 being concealed upon the person” that does not have certain safety features and does not
8 meet firing and drop-safety testing requirements. Cal. Penal Code § 31910. The statute is
9 broken into two subparts: first, it provides that a revolver¹ is deemed “unsafe” unless it
10 meets three specified criteria, *id.* § 31910(a)(1)-(3), and second, it provides that a
11 “semiautomatic pistol”² is deemed “unsafe” unless it meets six specified criteria. *Id.* §
12 31910(b)(1)-(6). The first three criteria apply to both revolvers and semiautomatic pistols:
13 they must have a mechanical “safety device,”³ and they must satisfy fire testing and drop-
14 safety testing requirements. Those three requirements were first enacted in 1999, *see*
15 California Unsafe Handgun Act, 1999 Cal. Stat. ch. 248 (SB 15), and are currently set forth
16 in Cal. Penal Code §§ 31910 (a)(1)-(3) (revolvers), and (b)(1)-(3) (semiautomatic pistols).

17 Over time, California enacted three more requirements for semiautomatic pistols—
18 in addition to the safety device and testing requirements—for inclusion on the roster. Since
19 2007, semiautomatic pistols must have a chamber load indicator (“CLI”) and magazine
20

21
22 ¹ A revolver has a cylinder in the center of the firearm with multiple chambers that hold the ammunition
and rotates with each pull of the trigger.

23 ² A semiautomatic pistol holds ammunition in a detachable magazine which, once inserted in the gun,
24 automatically feeds a fresh round into the chamber of the gun with each pull of the trigger and ejected
25 fired round. The UHA uses the term “pistol” to include semiautomatic handguns only, and “handgun” to
include “any pistol, revolver, or other firearm capable of being concealed upon the person.” Cal. Penal
Code § 31910.

26 ³ Revolvers must have a “safety device that, either automatically in the case of a double-action firing
27 mechanism, or by manual operation in the case of a single-action firing mechanism, causes the hammer
28 to retract to a point where the firing pin does not rest upon the primer of the cartridge.” Cal. Penal Code
§ 31910(a)(1). Semiautomatic pistols must “have a positive manually operated safety device.” *Id.* §
31910(b)(1).

1 disconnect mechanism (“MDM”). *See id.* § 31910(b)(4)-(5). A CLI is a “device that
2 plainly indicates that a cartridge is in the firing chamber.” *Id.* § 16380. An MDM is “a
3 mechanism that prevents a semiautomatic pistol that has a detachable magazine from
4 operating to strike the primer of ammunition in the firing chamber when a detachable
5 magazine is not inserted in the semiautomatic pistol.” *Id.* § 16900. Since 2013,
6 semiautomatic pistols also must have “microstamping” capability. “Microstamping” is a
7 set of “microscopic arrays of characters” that are imprinted onto the cartridge case of each
8 fired round which can be used to “identify the make, model, and serial number of the pistol”
9 used at a crime scene. *Id.* § 31910(b)(6)(A).⁴ Accordingly, the UHA limits the
10 manufacture and commercial sale of newer models of semiautomatic handguns to those
11 that have a manually operated safety device, meet firing and drop-safety testing
12 requirements, and have the CLI, MDM, and microstamping features. Stated differently,
13 newer models of semiautomatic handguns that lack these safety features and have not met
14 the testing requirements are deemed “unsafe,” may not be added to the roster, and may not
15 be manufactured or commercially sold in California.

16 The UHA contains a number of exceptions to its roster requirements. Semiautomatic
17 pistols that were “already listed on the roster” when the CLI, MDM and microstamping
18 requirements became effective are exempt. Cal. Penal Code §§ 31910(b)(4), (b)(5),
19 (b)(6)(A) (“grandfather” provisions). Handguns sold to law enforcement officials, and
20 certain curios or relics are also exempt. *Id.* § 32000(b)(3)-(4). Pistols used in Olympic
21 target shooting are exempt, *id.* § 32105, as are handguns in private party transfers, in which
22 two parties who are not licensed firearms dealers wish to enter into a sale. *Id.* § 32110(a).
23 So, too, are handguns that are delivered for consignment sale or as collateral for a
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26 ⁴ The CLI provision applies only to centerfire semiautomatic pistols, not rimfire semiautomatic pistols.
27 *See* Cal. Penal Code § 31910(b)(4). The MDM and microstamping requirements apply to both centerfire
28 and rimfire semiautomatic pistols. *See id.* §§ 31910(b)(5), (6). Rimfire ammunition is generally lower
velocity, less lethal and smaller than centerfire ammunition. The distinction between rimfire and centerfire
arms or ammunition is not relevant to the determination of this case.

1 pawnbroker loan, and handguns used solely as props for video production. *Id.* § 32110(f),
2 (h). The UHA does not restrict *possession* of off-roster handguns in the home or elsewhere;
3 rather, its focus is to limit the manufacture and commercial *sale* of such handguns.

4 Manufacturers must also pay an initial \$200 testing fee for a new handgun to be
5 added to the roster. *Id.* § 32015(b)(1); Cal. Code of Regs. tit. 11 (“CCR”), §§ 4070-4072.
6 Once a handgun is added to the roster, it is valid for one year, after which the manufacturer
7 may renew the listing by paying an annual fee. 11 CCR § 4070; *see id.* § 4071. A handgun
8 model may be removed from the roster for a variety of reasons, including if: (1) the annual
9 fee is not paid; (2) the handgun model sold after certification is modified from the model
10 submitted for testing; or (3) the handgun is deemed “unsafe” based on further testing. 11
11 CCR § 4070(c); *see also* Cal. Penal Code § 32015(b)(2) (stating any handgun
12 “manufactured by a manufacturer who . . . fails to pay” the roster fee “may be excluded
13 from the roster.”). In addition, in January 2021, the California Legislature accelerated the
14 removal of semiautomatic handguns from the roster by requiring removal of three such
15 grandfathered handguns for every approved semiautomatic pistol added to the roster
16 (“three-for-one removal provision”). Cal. Penal Code § 31910(b)(7).

17 **B. The Plaintiffs and Their Claim**

18 Plaintiffs are law-abiding individuals, licensed firearm retailers, and organizations,
19 with individual and retail members, who allege the UHA prevents them from exercising
20 their Second Amendment rights to purchase handguns not listed on the roster for self-
21 defense, *i.e.*, off-roster handguns. (Third Amended Complaint (“TAC”) ¶¶ 16, 17-54, 59
22 (alleging the UHA “prevent[s] Plaintiffs . . . from purchasing [off-roster] handguns that are
23 categorically in common use for self-defense and other lawful purposes, and thus violate[s]
24 the Second and Fourteenth Amendments to the United States Constitution.”).)⁵

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27 ⁵ “Strictly speaking, [a state] is bound to respect [an individual’s] right to keep and bear arms because of
28 the Fourteenth Amendment, not the Second.” *Bruen*, 142 S.Ct. at 2137. However, since the protections
of the Second Amendment are made applicable to the states through the Due Process Clause of the

1 Plaintiffs allege that, but for the UHA, they would have available for purchase on
2 the retail market hundreds of these off-roster handguns. (*See* TAC ¶¶ 17-38.) Because of
3 the roster, the number of handguns available for retail sale “is a small fraction of the total
4 number of handgun makes and models commercially available throughout the vast majority
5 of the United States[.]” (*Id.* ¶ 71.) Plaintiffs also allege that each layer of regulation under
6 the UHA has hastened the dramatic shrinkage of handguns available for purchase in
7 California. Plaintiffs allege there were nearly 1,300 makes and models of approved
8 handguns on the roster in 2013, but that the list has steadily declined over the past decade
9 to 815 as of October 24, 2022. (*Id.* ¶ 73.).

10 Plaintiff Lana Rae Renna alleges that but for the UHA she would purchase the Smith
11 & Wesson M&P® 380 SHIELD™ EZ® (*id.* ¶ 18); Danielle Jaymes would purchase a Sig
12 365, G43X, Glock 19 Gen5, Sig P320, and/or a Nighthawk Lady Hawk (*id.* ¶ 21); Laura
13 Schwartz would purchase a Glock 19 Gen5 and/or Springfield Armory Hellcat (*id.* ¶ 23);
14 Michael Schwartz would purchase a Glock 19 Gen5 and/or Springfield Armory Hellcat
15 (*id.* ¶ 25); John Klier would purchase a Glock 19 Gen5 (*id.* ¶ 27); Justin Smith would
16 purchase a CZ P10, Walther Q5 SF, and/or Glock 19 Gen4 and/or Gen5 (*id.* ¶ 29); John
17 Phillips would purchase a Sig Sauer P365, Sig Sauer P320 M17, Glock 17 Gen5 MOS,
18 Fabrique National Herstal 509, and/or Fabrique National Herstal FNX-9 (*id.* ¶ 31); Cheryl
19 Prince would purchase a Sig Sauer P365 (*id.* ¶ 33); Darin Prince would purchase a Sig
20 Sauer P320 AXG Scorpion (*id.* ¶ 35); and Ryan Peterson would purchase a Fabrique
21 National Herstal 509 Tactical, Sig Sauer P220 Legion (10mm), Staccato 2011, Glock 19
22 Gen5, Glock 17 Gen5 MOS, and Wilson Combat Elite CQB 1911 (9mm). (*Id.* ¶ 38.) The
23 retailer Plaintiffs allege that but for the UHA they would purchase at wholesale and “make
24 available for [retail] sale . . . all of the constitutionally protected [off-roster] new handguns
25 on the market that are available outside of California.” (*Id.* ¶¶ 42, 46, 50.) The institutional
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28 Fourteenth Amendment, *McDonald v. Chicago*, 561 U.S. 742 (2010), the Court refers to the claim at issue here as one under the Second Amendment.

1 Plaintiffs promote Second Amendment rights and are filled with individual and retailer
2 members who desire to purchase and sell off-roster handguns. (*Id.* ¶¶ 51-54.)

3 All of the handguns identified in the TAC are semiautomatic pistols, not revolvers.
4 While revolvers and semiautomatic pistols are subject to the UHA’s mechanical safety
5 device and firing and drop-safety testing requirements, Cal. Penal Code § 31910(a)(1)-(3)
6 & (b)(1)-(3), the focus of the subject litigation has been on the UHA’s CLI, MDM,
7 microstamping, and three-for-one removal requirements, *id.* § 31910(b)(4)-(7), as those
8 requirements apply only to the peculiar mechanics and operation of semiautomatic pistols,
9 the arms specifically identified in the TAC.

10 Based on these allegations, Plaintiffs filed this action on November 10, 2020. (ECF
11 No. 1.) Plaintiffs initially challenged the UHA, AB 1621, and other state regulations. (*See*
12 *id.*) On January 4, 2021, Plaintiffs filed a FAC, alleging two claims under 42 U.S.C. §
13 1983—one for deprivation of Second Amendment rights, as secured by the Fourteenth
14 Amendment, and one for violation of the Fourteenth Amendment right to equal protection
15 of laws. (ECF No. 10.) Defendants moved to dismiss the FAC, (ECF No. 12), and this
16 Court granted in part and denied in part the motion on April 23, 2021. (ECF No. 17.)
17 Specifically, this Court granted Defendants’ motion and dismissed Plaintiffs’ Second
18 Amendment challenge to the CLI, MDM, and microstamping provisions as “foreclosed”
19 by *Pena v. Lindley*, 898 F.3d 969 (9th Cir. 2018), (ECF No. 17 at 6), and denied the motion
20 as to Plaintiffs’ challenge to the three-for-one roster removal provision. (*Id.* at 9-14)
21 (holding Defendants “have not met their burden to show the imposition of the three-for-
22 one provision is a reasonable fit for their stated [public safety] objective.”)

23 Thereafter, on June 23, 2022, the Supreme Court issued its opinion in *Bruen*, which
24 fundamentally changed Second Amendment jurisprudence. *See United States v. Rahimi*,
25 61 F.4th 443, 450 (5th Cir. 2023) (stating prior two-step means-end inquiry used by circuit
26 courts to analyze laws that might impact Second Amendment is rendered “obsolete” by
27 *Bruen*). In light of *Bruen*, Plaintiffs filed a Second Amended Complaint (“SAC”) (ECF
28 No. 49), and motion for preliminary injunction. (ECF No. 53.) The motion for preliminary

1 injunction targeted portions of AB 1621, which prohibited computer numerical control
2 (“CNC”) milling machines used to make untraceable, non-serialized firearms or parts (*i.e.*,
3 “ghost guns”). (*See id.*) The Court heard argument after a full round of briefing, but prior
4 to any decision on the matter, Plaintiffs withdrew their motion and voluntarily dismissed
5 the AB 1621 claim. (ECF No. 63.)

6 The parties thereafter stipulated that Plaintiffs would file a Third Amended
7 Complaint. (ECF No. 65.) The TAC solely challenges the UHA under the Second and
8 Fourteenth Amendments. (ECF No. 67.) That challenge is now before the Court on the
9 present motion.

10 **C. The Ninth Circuit’s Decision in *Pena v. Lindley***

11 In *Pena*, the Ninth Circuit addressed whether the CLI, MDM, and microstamping
12 provisions of the UHA violated the plaintiffs’ Second Amendment rights using the now
13 obsolete two-step means-end inquiry. 898 F.3d 969 (9th Cir. 2018). Under that approach,
14 the *Pena* court noted it must first consider whether the UHA “burdens conduct protected
15 by the Second Amendment, and if it does, we apply an appropriate level of scrutiny.” *Id.*
16 at 975 (citation and quotations omitted). At the first step, *Pena* assumed without deciding
17 that the CLI, MDM and microstamping provisions of the UHA burdened conduct protected
18 by the Second Amendment. *Id.* at 976. After determining the “UHA does not effect a
19 substantial burden” on the plaintiffs’ Second Amendment rights, *Pena* concluded the
20 appropriate standard of review was “intermediate scrutiny,” *id.* at 979, and then applied
21 that level of scrutiny to determine whether the UHA was reasonably tailored to address the
22 State’s substantial interests in public safety and criminal investigation.

23 Applying that standard, *Pena* focused on a number of factors it believed lessened the
24 severity of the burden on the plaintiffs’ Second Amendment rights, including the plaintiffs’
25 ability under the UHA to “buy an operable handgun suitable for self-defense—just not the
26 exact gun they want,” and the exceptions provided by the UHA to purchase grandfathered
27 guns (without CLI, MDM, and microstamping features) and off-roster guns through private
28 transactions. *Id.* at 978-79. Applying the UHA and its CLI, MDM and microstamping

1 requirements to the plaintiffs’ conduct (i.e., the ability to commercially purchase off-roster
2 semiautomatic handguns), the Ninth Circuit upheld the UHA because the law was
3 reasonably tailored to address the important state interests of public safety and law
4 enforcement investigation. *Id.* at 979-86.

5 Under *Bruen*, however, the two-step means-end inquiry employed by *Pena* is now
6 obsolete. 142 S.Ct. at 2127. As noted, when the Second Amendment’s plain text covers
7 an individual’s conduct, as here, the Constitution presumptively protects that conduct, in
8 which case the state “may not simply posit that the regulation promotes an important
9 interest.” *Id.* at 2126. So today, *Pena* and its analysis of the subject regulations are of
10 limited relevance. Instead, the State must demonstrate the UHA is consistent with this
11 Nation’s historical traditions of firearm regulations. *Id.* With this background in mind, the
12 Court turns to whether Plaintiffs are entitled to a preliminary injunction against
13 enforcement of these provisions of the UHA under the *Bruen* framework.⁶

14 II.

15 DISCUSSION

16 A. Preliminary Injunction

17 Injunctive relief is “an extraordinary remedy that may only be awarded upon a clear
18 showing that the plaintiff is entitled to such relief.” *Winter v. Natural Res. Def. Council,*
19 *Inc.*, 555 U.S. 7, 22 (2008). “The purpose of a preliminary injunction is to preserve the
20 status quo ante litem pending a determination of the action on the merits.” *Boardman v.*
21 *Pac. Seafood Grp.*, 822 F.3d 1011, 1024 (9th Cir. 2016) (internal quotation marks omitted).
22 A preliminary injunction requires Plaintiffs to show that (1) they are likely to succeed on
23 the merits, (2) they are likely to suffer irreparable harm without preliminary relief, and (3)
24 the balance of equities tips in their favor and an injunction is in the public interest. *Winter*,

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28 ⁶ See *Miller v. Gammie*, 335 F.3d 889, 893 (9th Cir. 2003) (explaining in situations “where the reasoning
or theory of our prior circuit authority is clearly irreconcilable with the reasoning or theory of intervening
higher authority” district courts are required to “reject the prior circuit opinion as having been effectively
overruled.”).

1 555 U.S. at 20; *Drakes Bay Oyster Co. v. Jewell*, 747 F.3d 1073, 1092 (9th Cir. 2014)
2 (stating balance of equities and public interest merge into one factor when the government
3 is a party). Likelihood of success on the merits is a “threshold inquiry,” and thus if a
4 movant fails to establish that factor, the court “need not consider the other factors.”
5 *California v. Azar*, 911 F.3d 558, 575 (9th Cir. 2018).

6 Plaintiffs move to enjoin the entirety of the UHA’s roster requirements codified in
7 Cal. Penal Code §§ 31910, 32000(a), and 32015(a),(b)(2). Plaintiffs argue:

8 To be clear, the Plaintiffs contend that the UHA’s roster fees, the testing
9 requirements, and the roster removal provisions all operate together, along
10 with the UHA’s primary mechanisms—the requirements that semiautomatic
11 handguns must have chamber load indicator, magazine disconnect
12 mechanism, and microstamping capability to join the roster[]—to accomplish
the [sales] ban.

13 (Reply Br. at 5 (ECF No. 74).) Defendants correctly note that the UHA has many distinct
14 roster provisions, enacted at different times for different purposes, and any relief must be
15 specific. *See Orantes-Hernandez v. Tornburgh*, 919 F.2d 549, 558 (9th Cir. 1990)
16 (explaining “an injunction must be narrowly tailored to give only the relief to which
17 plaintiffs are entitled.”). The UHA’s roster listing requirement, fees, safety device, and
18 firing and drop-safety testing requirements have been in place since 1999, and it is apparent
19 revolvers and semiautomatic pistols (including several with CLI and MDM capabilities)
20 have been approved for retail sale and added to the roster since its inception in 1999 and
21 up to 2013, when the microstamping requirement was enacted. Thus, it is unclear on the
22 present record how the earlier roster requirements from 1999 impact the retail sale of
23 handguns, contribute to contraction of the roster, or otherwise violate Plaintiffs’ Second
24 Amendment rights. Specifically, Plaintiffs have not met their burden to show the UHA’s
25 manufacturer roster fee assessment violates their Second Amendment rights. Plaintiffs are
26 individuals, retail sellers, and nonprofit organizations and foundations consisting of
27 individuals and retail sellers, not manufacturers. It is unclear how Plaintiffs have standing
28 to complain about fees that must be paid by manufacturers to have their handgun models

1 remain on the roster. Similarly, Plaintiffs have failed to address how the firing and drop-
2 safety testing requirements for revolvers and semiautomatic pistols violate their rights.
3 Plaintiffs also presented no argument or evidence that the roster listing requirement *itself*
4 or the mechanical “safety device” requirements for revolvers and semiautomatic pistols
5 violate their rights. Accordingly, the Court denies without prejudice Plaintiffs’ motion for
6 such relief.

7 However, as discussed in detail below, Plaintiffs have shown likely success on their
8 claim that the UHA’s CLI, MDM and microstamping requirements violate their Second
9 Amendment rights. In addition, because the UHA’s three-for-one removal provision
10 depends on the CLI, MDM, and microstamping provisions, it too is unenforceable. *See*
11 Cal. Penal Code § 31910(b)(7) (stating “for each semiautomatic pistol newly added to the
12 roster,” CDOJ shall “remove from the roster exactly three semiautomatic pistols lacking
13 one or more of the applicable [CLI, MDM and microstamping] features described in [§
14 31910(b)(4)-(6)]”).

15 1. Likelihood of Success on the Merits

16 “A plaintiff seeking a preliminary injunction must establish he is likely to succeed
17 on the merits.” *Winter*, 555 U.S. at 20. Thus, Plaintiffs must show likely success on their
18 claim that the UHA’s CLI, MDM, and microstamping requirements violate their Second
19 Amendment rights. *Bruen* sets out two analytical steps to determine whether a firearm
20 regulation violates an individual’s Second Amendment rights. First, courts must determine
21 whether “the Second Amendment’s plain text covers [the] individual’s conduct.” 142 S.
22 Ct. at 2129-30. If so, then “the Constitution presumptively protects that conduct,” and the
23 government “must justify its regulation by demonstrating that it is consistent with the
24 Nation’s historical traditions of firearm regulation.” *Id.* at 2130. “Only then may a court
25 conclude that the individual’s conduct falls outside the Second Amendment’s ‘unqualified
26 command.’” *Id.* (citation omitted). Under this framework, Plaintiffs must first demonstrate
27 the Second Amendment’s plain text covers their conduct.

28 ///

1 *a. Second Amendment and Plaintiffs' Conduct*

2 The Second Amendment provides: “A well regulated Militia, being necessary to the
3 security of a free State, the right of the people to keep and bear Arms, shall not be
4 infringed.” U.S. Const. amend. II. To determine whether the plain text of the Amendment
5 covers the conduct regulated by the challenged law, it is necessary to “identify and
6 delineate the specific course of conduct at issue.” *National Ass’n for Gun Rights, Inc. v.*
7 *City of San Jose*, --- F.Supp.3d ---, 2022 WL 3083715, at *8 (N.D. Cal. Aug. 3, 2022)
8 (citing *Bruen*, 142 S. Ct. at 2134). The course of conduct at issue here is Plaintiffs’ desire
9 to commercially purchase off-roster semiautomatic handguns that are in common use for
10 self-defense and other lawful purposes.

11 Determining the scope of the Second Amendment and whether it covers the conduct
12 at issue is “rooted in the Second Amendment’s text, as informed by history.” *Bruen*, 142
13 S. Ct. at 2127. In *Bruen*, the Supreme Court interpreted the Second Amendment in light
14 of “historical tradition” and held the Amendment protects all arms “in common use,” and
15 “handguns . . . are indisputably in ‘common use’ for self-defense today.” *Bruen*, 142 S.
16 Ct. at 2143 (citing *District of Columbia v. Heller*, 554 U.S. 570, 627 (2008)) (cleaned up).
17 Because the arms at issue (semiautomatic pistols) are handguns, and handguns are
18 “indisputably in common use” today, *id.*, semiautomatic pistols categorically are “Arms”
19 covered by the Second Amendment. The Amendment does not parse between types, makes
20 and models of arms. *See Heller*, 554 U.S. at 629 (stating “[i]t is no answer to say, as
21 petitioners do, that it is permissible to ban the possession of handguns so long as the
22 possession of other firearms (i.e., long guns) is allowed.”) All handguns are covered, so
23 long as they are in common use. Thus, Plaintiffs’ ability to commercially purchase off-
24 roster semiautomatic handguns falls within the plain text of the Second Amendment and is
25 presumptively protected.

26 Defendants do not dispute that handguns, as a category, are covered by the Second
27 Amendment. Nor do Defendants dispute that “the right to keep arms, necessarily involves
28 the right to purchase them.” *Teixeira v. Cty. of Alameda*, 873 F.3d 670, 678 (9th Cir. 2017)

1 (cleaned up). Rather, Defendants argue that Plaintiffs’ desire to purchase at retail
2 *particular* semiautomatic handguns (those without the CLI, MDM and microstamping
3 features) is not covered by the Second Amendment. In support of this argument,
4 Defendants note the UHA is not a categorical ban on *all* handguns like that in *Heller*, as
5 Plaintiffs have available for purchase on the retail market hundreds of handguns on the
6 roster, including single shot handguns,⁷ revolvers and older models of grandfathered
7 semiautomatic pistols. (ECF No. 72 at 20-21.) Defendants point out that as of December
8 31, 2022, the roster list included many handguns from which Plaintiffs could choose,
9 including 16 single-shot handguns, 314 revolvers and 499 semiautomatic pistols. (*Id.* at
10 21) (citing Declaration of Salvador Gonzalez ISO Defendants Opposition to Preliminary
11 Injunction (“Gonzalez Decl.”) ¶ 19.) But the *availability* of handguns on the roster for
12 retail purchase does not address in any way whether Plaintiffs’ desire to purchase off-roster
13 semiautomatic handguns is *covered* by the Second Amendment. Instead, the argument
14 focuses on the *burden* imposed on Plaintiffs’ rights, which assumes Plaintiffs’ conduct is
15 protected (covered) by the Amendment. Defendants’ argument is therefore rejected as it
16 fails to address the plain text of the Amendment.⁸

17 Next, Defendants argue the Second Amendment is limited to arms in “common use.”
18 The Supreme Court in *Heller* recognized that the “right to keep and carry” under the
19 Second Amendment is limited to arms “in common use at the time[.]” 554 U.S. at 627

21 ⁷ A single-shot handgun is capable of holding only a single round of ammunition and must be manually
22 reloaded with each fired round.

23 ⁸ Defendants advance a related non-textual argument that the Second Amendment is “not a right to keep
24 and carry any weapon whatsoever in any manner whatsoever and for whatever purpose[.]” quoting *Heller*,
25 554 U.S. at 628. (Opp’n at 22) (ECF No. 72.) However, as noted, *Heller* admonishes that “[i]t is no
26 answer to say, as petitioners do, that it is permissible to ban the possession of handguns so long as the
27 possession of other firearms (i.e., long guns) is allowed.” 554 U.S. at 629. Thus, Defendants’ argument
28 that it is constitutionally permissible to prohibit commercial sales of state-of-the-art semiautomatic pistols,
so long as Plaintiffs can purchase single shot handguns, revolvers and older grandfathered models of
semiautomatic pistols that are shrinking in number and less desirable runs headlong into *Heller*’s
admonition. As *Bruen* reiterates, the Second Amendment “is not ‘a second-class right, subject to an
entirely different body of rules than the other Bill of Rights guarantees.’” 142 S. Ct at 2156 (quoting
McDonald v. City of Chi., Ill., 561 U.S. 742, 780 (2010)).

1 (citations omitted), and noted that “limitation is fairly supported by the historical tradition
2 of prohibiting the carrying of ‘dangerous and unusual weapons.’” *Id.* The State does not
3 argue that the off-roster semiautomatic handguns at issue are “dangerous and unusual.”
4 Indeed, many of these handguns are used by law enforcement. Rather, it argues Plaintiffs
5 have failed to show that these handguns are “in common use” and therefore Plaintiffs’
6 conduct is not covered by the Amendment. (ECF No. 72 at 24.) This argument is a stretch
7 under any reasonable assessment.

8 Defendants argue Plaintiffs have not produced any raw data to support the
9 proposition that off-roster handguns are in “common use.” Yet, the Supreme Court has
10 already stated that handguns are “‘the most preferred firearm in the nation to ‘keep’ and
11 use for protection of one’s home and family.’” *Heller*, 554 U.S. at 628-29 (quoting *Parker*
12 *v. District of Columbia*, 478 F.3d 370, 400 (D.C. Cir. 2007)). Indeed, handguns are the
13 “quintessential self-defense weapon[.]” *Heller*, 554 U.S. at 629, and “are indisputably in
14 ‘common use’ for self-defense today.” 142 S. Ct. at 2143. The most popular handguns
15 today are semiautomatic pistols. (ECF No. 71-5, Declaration of John Phillips ISO
16 Plaintiffs’ Motion for Preliminary Injunction (“Phillips Decl.”) ¶¶ 12-18 (stating
17 semiautomatic handguns identified by Plaintiffs in this litigation are top-sellers across the
18 country).) And the roster *itself* shows even older models of grandfathered semiautomatic
19 pistols are the most popular type of handgun in California, far outpacing revolvers: 499 to
20 314. (ECF No. 72 at 21 n.11 (citing Gonzalez Decl. ¶ 19).

21 Plaintiffs submitted several declarations in support of their motion and argument that
22 off-roster handguns are in common use, to which Defendants lodged objections.
23 Discussion of one those declarations suffices to address Defendants’ objections.

24 Declarant John Phillips is president and founder of Poway Weapons & Gear and
25 PWG Range (“PWGG”), a licensed firearms dealership in Poway, California, and operator
26 of one the largest indoor gun ranges in the country. (Phillips Decl. ¶ 2) (stating PWGG
27 serves more than 200,000 people a year in its retail store, more than 80,000 on its ranges
28 for target shooting, and more than 8,000 students for firearms training and education).

1 Phillips is a member of a nationwide buying group with more than 450 retail members in
2 all 50 states, whose members “order more than \$1 billion in firearms annually.” (*Id.* ¶ 5.)
3 Phillips also serves on the retail advisory board of Smith & Wesson Brands, Inc., where he
4 is familiar with market needs and purchasing trends. (*Id.* ¶ 6.) He is versed in the roster,
5 meets with all major firearms manufacturers who visit PWGG to sell their products, and
6 reviews retailers’ online sales portals and authoritative industry publications which identify
7 handguns that are available and commonly used throughout the nation. (*Id.* ¶¶ 6-8.) He is
8 licensed to carry concealed, and he is a trained firearms instructor. (*Id.* ¶ 21.) Based on
9 his training, experience and personal knowledge, Phillips states that the roster has shrunk
10 over the past decade from nearly 1,300 approved handguns to just over 800, (*id.* ¶ 10), and
11 Californians are left to choose from a contracting list of aging handgun models that are
12 inferior to and less desirable than newer models of semiautomatic pistols in terms of
13 ergonomics, reliability, ambidextrous configurations, and safety. (*Id.* ¶¶ 10-13.) He further
14 states the semiautomatic handguns identified by Plaintiffs in this litigation are top-sellers
15 and in common use throughout the country, and the roster bans all of these handguns in
16 addition to “many hundreds, and likely thousands, of other models of handguns in common
17 use throughout the United States[.]” (*Id.* ¶¶ 10-18.)

18 Defendants object to Phillips’s declaration on grounds of improper lay opinion and
19 insufficient evidence to support the witness’s personal knowledge under Federal Rules of
20 Evidence 701 and 602, respectively. Specifically, Defendants object to Phillips’s opinions
21 that the Glock43 is one of the top-selling firearms designed for concealed carry in the
22 country, that the Sig Sauer 320 is the most popular carry gun in the nation, and that those
23 handguns in addition to the Sig 365, Glock 17 Gen 5, FN 509 and FNX-0 are widely sold
24 and possessed outside of California and in common use throughout the country. The
25 objections are overruled as Phillips’s opinions are based on his particular training,
26 experience and personal knowledge in the industry. His opinions are proper lay opinions
27 based on sufficient data, facts and experience. Phillips’s opinions corroborate what is
28 evident—that the roster bans commercial sale of newer models of semiautomatic handguns

1 that are in common use. Therefore, any limitation of the Second Amendment to arms in
2 common use imposed by *Heller* does not assist Defendants because the arms in question
3 are in common use.

4 Finally, Defendants argue the UHA falls within a category of “lawful regulatory
5 measures” identified in *Heller*. The Supreme Court in *Heller* catalogued a number of
6 “presumptively lawful regulatory measures” that are presumed to be consistent with the
7 historical scope of the Second Amendment, including: “longstanding prohibitions on the
8 possession of firearms by felons and the mentally ill, [] laws forbidding the carrying of
9 firearms in sensitive places such as schools and government buildings, [] *laws imposing*
10 *conditions and qualifications on the commercial sale of arms*[,] ... [and laws] prohibiting
11 the carrying of dangerous and unusual weapons.” 554 U.S. at 626-27 (emphasis added).
12 In a single conclusory pronouncement, Defendants argue that because the CLI, MDM, and
13 microstamping requirements of the UHA do not ban possession of handguns and do not
14 bar commercial sales of hundreds of grandfathered handguns on the roster that are suitable
15 for self-defense, the UHA merely “imposes conditions and qualifications on the
16 commercial sale of arms” and “[is] ‘presumptively lawful’” under *Heller*. (ECF No. 72
17 at 23 (quoting *Heller*, 554 U.S. at 626-27).)

18 A one sentence conclusion by Defendants that the provisions of the UHA are
19 presumptively lawful “conditions and qualifications on the commercial sale of arms” is
20 insufficient, particularly in light of *Pena* and persuasive authority to the contrary. In *Pena*,
21 the Ninth Circuit declined to define “the parameters of the Second Amendment’s individual
22 right in the context of commercial sales.” 898 F.3d at 976. *Pena* observed the Ninth Circuit
23 “has strained to interpret the phrase ‘conditions and qualifications on the commercial sale
24 of arms’” and viewed the language as “sufficiently opaque” such that it cannot be relied
25 upon alone. *Id.* at 976 (cleaned up). Judge Bybee, concurring in *Pena*, noted that “the
26 Supreme Court in *Heller* could not have meant that anything that *could be characterized*
27 as a condition and qualification on the commercial sale of firearms is immune from more
28 searching Second Amendment scrutiny.” *Id.* at 1007 (original emphasis) (Bybee, J.,

1 concurring). Similarly, in *United States v. Marzzarella*, 614 F.3d 85, 92 n.8 (3d. Cir. 2010),
2 the Third Circuit noted that “[i]f there were somehow a categorical exception for
3 [commercial sales] restrictions, it would follow that there would be no constitutional defect
4 in prohibiting the commercial sale of firearms. Such a result would be untenable under
5 *Heller*.” The Court agrees.

6 In *Hirschfeld v. Bureau of Alcohol, Firearms, Tobacco & Explosives*, 5 F.4th 407
7 (4th Cir. 2021), *vacated as moot on other grounds*, 14 F.4th 322 (4th Cir. 2021), certain
8 federal statutes prohibited licensed firearms dealers from selling handguns and handgun
9 ammunition to anyone under the age of 21. The Fourth Circuit rejected the government’s
10 argument that those federal laws were presumptively lawful regulations as “conditions and
11 qualifications on the commercial sale of arms.” 5 F.4th at 416. It stated, “[a] condition or
12 qualification on the sale of arms is a hoop someone must jump through to *sell* a gun, such
13 as obtaining a license, establishing a lawful premise, or maintaining transfer records.” *Id.*
14 at 416 (original emphasis). *Hirschfeld* noted that the federal laws in question there “operate
15 as a total ban on *buying* a gun from a licensed dealer that has met the required [licensing]
16 conditions and qualifications to sell arms,” *id.* (original emphasis), and therefore declined
17 to find that those laws constituted conditions on commercial sales.⁹

18 *Hirschfeld* reasoned that “a law’s substance, not its form, determines whether it
19 qualifies as a condition on commercial sales.” *Id.* at 416 (citing *United States v. Hosford*,
20 843 F.3d 161, 166 (4th Cir. 2016)). Providing examples of commercial sales laws that turn
21 “a condition or qualification into a functional prohibition” the court referenced: “a Chicago
22 ordinance that allowed firearm transfers only outside city limits;” a “ban on firing ranges
23 within city limits” that was “a serious encroachment” on law-abiding citizens of Chicago
24

25
26 ⁹ *But see NRA v. Bondi*, --- F.4th ---, 2023 WL 2484818, at *2 (11th Cir. Mar. 9, 2023) (stating a Florida
27 statute prohibiting persons under the age of 21 from buying firearms is a law imposing conditions and
28 qualifications on the commercial sale of firearms). Although the court stated the Florida statute is an
example of a commercial sales regulation, it did not further elaborate and instead assumed the “‘Second
Amendment’s plain text’ covers 18-to-20-year-olds when they buy firearms.” *Id.* at *6.

1 from “engaging in target practice in the controlled environment of a firing range;” and “a
2 commercial zoning and distancing law [that] worked in tandem to functionally preclude
3 any gun ranges, thus severely restricting Second Amendment rights.” *Hirschfeld*, 5 F.4th
4 at 416 (citations and quotations omitted).

5 Here, like the examples cited in *Hirschfeld*, the CLI, MDM, and microstamping
6 provisions of the UHA operate as a “functional prohibition.” Collectively they prohibit the
7 commercial sale of a large subset of handguns in common use—hundreds of state-of-the-
8 art semiautomatic pistols—and have done so for more than a decade, thus precluding law-
9 abiding citizens from purchasing these arms on the retail market for lawful purposes. These
10 handguns are sold throughout the United States, in 47 states. California is a distinct outlier.
11 If the commercial sales limitation identified in *Heller* were interpreted as broadly as the
12 State suggests, the exception would swallow the Second Amendment. States could impose
13 virtually any condition or qualification on the sale of any arm covered by the Second
14 Amendment, no matter how prohibitory. The Court, therefore, declines the State’s
15 invitation to characterize the CLI, MDM, and microstamping requirements as a law merely
16 imposing conditions and qualifications on the sales of arms. It is undisputed that there are
17 no commercially available semiautomatic handguns manufactured in the United States that
18 have the CLI, MDM and microstamping features. (ECF No. 71-5; Phillips Decl., ¶ 9.) “As
19 a result, literally no new models of [semiautomatic handguns] have been added to the
20 [r]oster since 2013.”¹⁰ (*Id.*) Accordingly, the Court rejects Defendants’ argument and
21 finds these provisions of the UHA are not regulations that merely impose conditions and
22 qualifications on the commercial sales of arms but operate collectively as an outright
23

24
25 ¹⁰ Aside from the UHA exemptions for grandfathered handguns and private sales, Defendants
26 acknowledge Plaintiffs can only purchase on the retail market “revolver[s], non-semiautomatic pistol[s],
27 [and] any firearm that is not a handgun.” See Opp’n at 22 (ECF No. 72) (emphasis added). It is also
28 undisputed that private sales of off-roster handguns to ordinary people are generally limited to supplies
(and sales) from law enforcement officials and people who move from out of state into California with an
off-roster handgun. Those sales opportunities are few in number and carry a significant price markup
compared to retail sales.

1 prohibition on commercial sales of a wide segment of modern arms in common use for
2 self-defense and other lawful purposes.¹¹

3 For these reasons, the Court concludes Plaintiffs’ desire to purchase the arms in
4 question on the retail market falls within the plain text of the Second Amendment and is
5 not subject to any presumptively lawful exception identified in *Heller*. As such, Plaintiffs’
6 conduct is presumptively protected and the burden shifts to Defendants to justify the UHA
7 by proffering historically analogous firearms regulations. *See Baird v. Bonta*, --- F.Supp.3d
8 ---, 2022 WL 17542432, at *6 (E.D. Cal. Dec. 8, 2022) (stating for a preliminary injunction
9 plaintiffs bear the burden of proving the textual analysis under *Bruen* and defendants bear
10 the burden of proving historical analogues under *Bruen*).

11 *b. Historical Precedent*

12 The State has the burden of showing relevant “historical precedent from before,
13 during, and even after the founding [that] evinces a comparable tradition of regulation.”
14 *Bruen*, 142 S. Ct. at 2131-32. The State need not identify a “historical *twin*,” for a “well-
15 established and representative historical *analogue*” is sufficient. *Id.* at 2133 (original
16 emphasis). “[W]hether modern and historical regulations impose a comparable burden on
17 the right of armed self-defense and whether that burden is comparably justified are central
18 considerations when engaging in an analogical inquiry.” *Bruen*, 142 S.Ct. at 2133
19 (citations omitted). Thus, *Bruen* “distilled two metrics for courts to compare the
20 Government’s proffered analogues against the challenged law: *how* the challenged law
21 burdens the right to armed self-defense, and *why* the law burdens that right.” *Rahimi*, 61
22 F.4th at 454 (citing *Bruen*, 142 S. Ct. at 2133). Despite the need to assess the how and
23 why, *Bruen* cautioned “[t]his does not mean that courts may engage in independent means-
24 end scrutiny under the guise of an analogical inquiry.” *Bruen*, 142 S. Ct. at 2133 n.7. The
25 key question, therefore, is whether the challenged law, here the CLI, MDM, and
26

27
28 ¹¹ The parties did not address the UHA’s roster fee requirement and whether it might fall within the
presumptively lawful category of “conditions and qualifications on the commercial sale of arms.”

1 microstamping provisions of the UHA, and the State’s proffered analogues are “relevantly
2 similar.” *Id.* at 2132.

3 The analogical inquiry begins with determining “how” and “why” the UHA
4 “burden[s] a law-abiding citizen’s right to armed self-defense.” *Id.* at 2133. The UHA (1)
5 prohibits the commercial sale of semiautomatic handguns, that (2) lack CLI, MDM, and
6 microstamping technology. The first aspect of the UHA goes to *how* the statute
7 accomplishes its goal (prohibiting retail sales of newer models of semiautomatic pistols),
8 and the second goes to its goal, the *why* (public safety and furthering law enforcement
9 investigative tools). To sustain the UHA’s burden on Plaintiffs’ Second Amendment
10 rights, the State must proffer “relevantly similar” historical regulations that imposed “a
11 comparable burden on the right of armed self-defense” that were also “comparably
12 justified.” *See Rahimi*, 61 F.4th at 455 (citing *Bruen*, 142 S.Ct. at 2136).

13 Defendants argue that states “have regulated for firearm safety, particularly to
14 prevent accidents and unintentional detonations, since the earliest days of the republic,”
15 (Opp’n at 27), and cite to four historical laws and a declaration from Dr. Saul Cornell, the
16 Paul and Diane Guenther Chair in American History at Fordham University, to meet its
17 burden. Initially, Defendants point to an 1805 Massachusetts law that required certain guns
18 to be inspected, marked, and stamped by an inspector (“prover”) before they could be sold.
19 (ECF No. 72-5, Cornell Decl. at ¶ 33; *id.* at Ex. 3.)¹² The law required that the prover test
20 certain muskets and pistols to ensure they safely discharged. 1805 Mass. Acts 588, § 1.
21 The provers duty “shall be to prove” that the “musket barrels and pistol barrels” are
22 “sufficiently ground, bored and breeched,” and to prove the musket and pistol barrels “will
23 carry a twenty-four-pound shot” 80 yards and 70 yards, respectively, without the barrels
24

25
26
27
28 ¹² In *Boland, et al. v. Bonta*, 22-cv-1421, 2023 WL 2588565, at *6-7 (C.D. Cal. Mar. 20, 2323), the State proffered additional proving laws as comparators to the challenged UHA provisions. *See id.* ECF Nos. 56 at 13-14; 56-3, Ex. 31 at 1-15 (noting Continental Army, Rhode Island, New Hampshire, New Jersey, Maryland, Maine, and Pennsylvania had similar proving laws to the 1805 Massachusetts law).

1 “burst[ing]” or “in no respect fail[ing.]” *Id.* If the firearm passed the test, the prover would
2 stamp his initials and the year of inspection on the firearm. *Id.*

3 The “why” of the 1805 law is to ensure off-brand firearms operated safely—to
4 prevent “introduc[tion] [of firearms] into use which are unsafe.” *Id.* at Preamble. In this
5 respect, the goal of the law is similar to the CLI and MDM requirements under the UHA:
6 public safety. But “how” the 1805 law accomplished its goal is entirely different from the
7 CLI, MDM, and microstamping requirements of the UHA. While the 1805 law prohibits
8 introduction of firearms that failed inspection (and are “unsafe”), it did not apply to
9 Springfield Armory, which produced the majority of guns in the state,¹³ and it did not
10 preclude the purchase of firearms manufactured out of state. The 1805 law required only
11 that all other muskets and pistols be “proved” to ensure they fired and discharged safely
12 without malfunctioning, in which case the prover would stamp the firearm and approve it
13 for commercial sale. *Id.* § 3.¹⁴ But the 1805 law stopped there. It did not prescribe
14 particular safety features, nor did it require manufactures to add safety features to already
15 safe arms. Requiring the *testing* of firearms to ensure they fired safely without
16 malfunctioning is significantly different from requiring manufacturers to *add* mechanical
17 safety features to arms in common use that are indisputably safe and operate as designed
18 for self-defense.

19 In addition, the “why” of the 1805 stamping requirement is not comparable to
20 microstamping under the UHA, as the former requirement served only to verify that the
21 arm had been tested, was safe—in that it fired without barrel bursting or otherwise failing,
22 and could be sold. California’s microstamping requirement is designed to assist law
23 enforcement in criminal investigations, not firearm discharge safety. Defendants concede
24

25 ¹³ Defendants acknowledge that at the time in Springfield, Massachusetts, most guns were manufactured
26 by Springfield Armory, which was under federal control. (ECF No. 72 at 27-28; Cornell Decl. at ¶ 32.)

27 ¹⁴ In this respect, the 1805 law and its barrel safety testing requirements may be similar to the UHA
28 provisions that require handguns to meet firing and drop-safety testing requirements. The Court reserves
ruling on that issue as it was not briefed by the parties. Similarly, the parties did not address the UHA’s
safety device requirement.

1 this point. (Opp’n Br. at 5) (“Microstamping is intended to provide important investigative
2 leads in solving gun-related crimes by allowing law enforcement personnel to quickly
3 identify information about the handgun from spent cartridge casings found at the crime
4 scene.”) (citation and quotations omitted).

5 The comparable burden on the right to self-defense is notable too. As noted, the
6 1805 law allowed purchasers to buy firearms from Springfield Armory and out of state
7 manufacturers, without proofing. In contrast, the CLI, MDM, and microstamping
8 provisions prohibit retail sales in the state of a significant segment of the most common
9 self-defense firearm sold in America today. Accordingly, the State has not shown that the
10 1805 Massachusetts law is relevantly similar or imposed a comparable burden on the right
11 of armed self-defense to the three UHA provisions at issue.

12 Next, Defendants point to three examples of laws regulating the storage of weapons
13 with or near gun powder, and the storage of gun powder.¹⁵ The Court considers these
14 examples in tandem since the goal of these laws, the “why,” is the same. First is a 1783
15 Massachusetts law that prohibited storing a loaded weapon in a home. Act of Mar. 1, 1783,
16 ch. XIII, 1783 Mass. Acts 37, An Act in Addition to the Several Acts Already Made for
17 the Prudent Storage of Gun Powder within the Town of Boston. Defendants state the text
18 of the statute is clear—to prevent “the unintended discharge of firearms [which] posed a
19 serious threat to life and limb.” (ECF No. 72 at 28.) However, that characterization is not
20 consistent with the Supreme Court’s assessment, where it addressed the same law, and
21 stated the 1783 Massachusetts law “text and its prologue[] makes clear that the purpose of
22 the prohibition was to eliminate the danger to firefighters posed by the depositing of loaded
23 Arms in buildings.” *Heller*, 554 U.S. at 631. The goal of the statute, the why, is to guard
24

25
26 ¹⁵ Here, too, the State in *Boland* proffered additional laws regarding storage of weapons with or near gun
27 powder, and the storage of gunpowder. *See Boland*, 2023 WL 2588565, at *7-8, 8:22-cv-1421, ECF No.
28 56-3, Ex. 31 at 1-15 (C.D. Cal.) (noting gunpowder regulations in New Jersey, Rhode Island,
Pennsylvania, New Hampshire, Connecticut, Iowa, Indiana, Ohio, Vermont, Tennessee, Nebraska,
Kentucky, California, and Oklahoma).

1 against fires and protect firefighters in times when highly combustible gun powder was
2 exposed to kerosine lanterns and candles. *See* 2 Acts And Laws Of The Commonwealth
3 Of Massachusetts 120 (1890) (stating “the depositing of loaded Arms in the Houses [of
4 Boston] is dangerous to the Lives of those who are disposed to exert themselves when a
5 Fire happens to break out”); *see also Jackson v. City & Cnty. of San Francisco*, 746 F.3d
6 953, 963 (9th Cir. 2014) (stating Boston’s firearm-and-gunpowder storage law is
7 historically distinct from the challenged firearm regulation in light of *Heller*).

8 Defendants also cite to a 1792 New York City statute, which granted the government
9 authority to search for gun powder and transfer gun powder to the public magazine for safe
10 storage. An Act to Prevent the Storage of Gun Powder, within in Certain Parts of New
11 York City, 2 LAWS OF THE STATE OF NEW-YORK, COMPRISING THE CONSTITUTION, AND
12 THE ACTS OF THE LEGISLATURE, SINCE THE REVOLUTION, FROM THE FIRST TO THE
13 FIFTEENTH SESSION, INCLUSIVE at 191-2 (Thomas, Greenleaf, ed., 1792). The statute
14 “prevent[ed] the storing of Gun-Powder, within certain Parts of the City of New-York.”
15 *Id.* Defendants additionally cite to an 1821 Maine law, which authorized government
16 officials to enter any building in any town to search for gun powder. 1821 Me. Laws 98,
17 An Act for the Prevention of Damage by Fire and the Safe Keeping of Gun Powder, chap.
18 25, § 5. Its purpose: “Prevention of Damage by Fire.” *Id.* Like the Massachusetts law,
19 the New York City and Maine laws regulated gun powder “due to the substance’s
20 dangerous potential to detonate if exposed to fire or heat.” (ECF No. 72-5, Cornell Decl.
21 at ¶ 42.)

22 The 1783 Massachusetts law, 1792 New York City statute, and 1821 Maine law are
23 not analogues to the challenged provisions of the UHA. Those laws regulated the storage
24 of gunpowder and loaded firearms with gun powder for fire-safety reasons, not gun-
25 operation safety reasons. Thus, the goal of these statutes is fire-safety (the why), and that
26 goal is addressed by controlling gun powder and loaded gun storage (the how). These
27 statutes “do not remotely burden the right of self-defense as much as an absolute ban on
28 handguns.” *Heller*, 554 U.S. at 632. While the CLI, MDM, and microstamping provisions

1 of the UHA are not an absolute ban on handguns, the provisions operate to ban commercial
2 acquisition of a significant segment of popular handguns designed for self-defense. The
3 foregoing fire-safety laws are not “relevantly similar” to the UHA roster provisions, and
4 they impose a far less “comparable burden” on Plaintiffs’ Second Amendment rights to
5 armed self-defense than does the UHA.

6 Defendants have not met their burden of presenting relevantly similar, historically
7 comparable analogues to the UHA’s CLI, MDM, and microstamping provisions. Plaintiffs
8 have therefore demonstrated likely success on the merits of these claims.

9 *c. Scope of Injunction*

10 Any relief granted in a preliminary injunction must be narrowly tailored. *See*
11 *Orantes-Hernandez*, 919 F.2d at 558. Having determined the CLI, MDM, and
12 microstamping provisions of the UHA violate Plaintiffs’ Second Amendment rights, the
13 Court must address whether the remaining UHA provisions at issue are severable. If a
14 challenged statute contains “unobjectionable provisions separable from those found to be
15 unconstitutional,” the court must sever such provisions. *Alaska Airlines, Inc. v. Brock*, 480
16 U.S. 678, 684 (1987) (cleaned up). “A court should refrain from invalidating more of [a]
17 statute than is necessary.” *Id.* “The standard for determining the severability of an
18 unconstitutional provision is well established: Unless it is evident that the Legislature
19 would not have enacted those [unconstitutional] provisions ... independently of that which
20 is not, the invalid part may be dropped if what is left is fully operative as a law.” *Id.*
21 (cleaned up). In conducting this inquiry, a court must ask “whether the law remains fully
22 operative without the invalid provisions.” *Murphy v. Nat. Collegiate Athletic Ass’n*, 138 S
23 Ct. 1461, 1482 (2018) (cleaned up).

24 The initial iteration of the UHA in 1999 deemed revolvers and semiautomatic pistols
25 “unsafe” if they lacked a safety device and did not meet firing and drop-safety testing
26 requirements. Cal. Penal Code § 12126(a)(1)-(3), (b)(1)-(3). Those provisions stood
27 independently for many years, and later were incorporated in more recent iterations of the
28 UHA. *See id.* § 31910(a)(1)-(3), (b)(1)-(3). As discussed, the Legislature thereafter

1 enacted the CLI and MDM provisions in 2003, effective at a later date, *see* Sen. Bill No.
2 489 (Cal. 2003-2004 Reg. Sess.), § 1, and the microstamping provision in 2007, also
3 effective at a later date. *See* Assem. Bill No. 1471 (Cal. 2007-2008 Reg. Sess.), § 2. It is
4 clear the Legislature would have enacted, and in fact did enact, the earlier provisions
5 without the CLI, MDM and microstamping provisions. Therefore, the CLI, MDM, and
6 microstamping provisions, Cal. Penal Code § 31910(b)(4)-(6), are severable from the rest
7 of the UHA and may be separately enjoined.

8 Under the three-for-one roster removal provision, for each approved semiautomatic
9 pistol added to the roster, “three semiautomatic pistols lacking one or more of the
10 applicable features described in paragraphs (4), (5), and (6) of subdivision (b)[,]” are
11 removed. Cal. Penal Code § 31910(b)(7). Paragraphs (4), (5), and (6) of subdivision (b)
12 refer to the CLI, MDM, and microstamping provisions, respectively. *Id.* § 31910(b)(4)-
13 (6). The text of subdivision (b)(7) makes clear it was “obviously meant to work together”
14 with its companion subdivisions (b)(4)–(6). *Murphy*, 138 S. Ct. at 1483. Therefore, the
15 three-for-one removal provision cannot be severed as it is not “fully operative without the
16 invalid provisions.” *Id.* at 1482. As such, the California Legislature could not have
17 intended for it to stand independently of the invalid provisions. The three-for-one removal
18 provision is therefore enjoined.

19 Unless it is evident the Legislature would not have enacted the rest of the law, “the
20 invalid provisions may be dropped if what is left is fully operative as a law.” *New York v.*
21 *United States*, 505 U.S. 144, 186 (1992). Here, the remaining UHA roster provisions are
22 fully operative without the CLI, MDM, microstamping, and three-for-one removal
23 provisions. There is no indication the Legislature would not have enacted the remaining
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1 roster provisions without the invalid provisions. Therefore, the invalid provisions, Cal.
2 Penal Code §§ 31910(b)(4)-(7), are severed and separately enjoined.¹⁶

3 *d. Discovery Request*

4 Defendants request additional time to conduct historical research and consult
5 additional experts. However, Defendants have had three months to mount a defense since
6 the filing of the TAC. In addition, *Bruen* was decided on June 23, 2022, more than 19
7 months before Defendants' Opposition Brief was filed in this matter on January 27, 2023.
8 And in light of *Bruen*, the parties stipulated in July 2022 to vacating the scheduling order
9 and the filing of a Second Amended Complaint by Plaintiffs. (ECF No. 45.) The need for
10 a historical deep dive to find regulations comparable to the UHA is no surprise to
11 Defendants. In fact, Defendants were presented with this exact task in November 2022 in
12 *Boland, et al. v. Bonta*, No. 8:22-cv-1421 (C.D. Cal.). Defendants there briefed a nearly
13 identical challenge under the Second Amendment to the CLI, MDM, and microstamping
14 requirements of the UHA and appeared for a preliminary injunction hearing with the same
15 expert they retained here, Dr. Cornell. Following that hearing, Defendants provided two
16 additional rounds of briefing on the merits. The district court in *Boland* issued its decision
17 on March 20, 2023, and provided a reasoned analysis and similar conclusions to those
18 reached by this Court.

19 Defendants also point to authorities cited to the district court in *Pena v. Lindley*, No.
20 2:09-cv-01185 (E.D. Cal.) (ECF No. 76), which demonstrate the CLI and MDM
21 technology has existed since the late 1800's and 1910, respectively. Defendants assert
22 additional time is needed to evaluate those authorities. However, those authorities simply
23 note the existence of CLI and MDM technology, not regulations mandating use of that
24 technology on arms then for sale.

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27 ¹⁶ Because the three-for-one roster removal provision is not severable from the CLI, MDM and
28 microstamping provisions, the Court declines to address Defendants' arguments that Plaintiffs' challenge
to the roster removal provision fails for lack of standing and ripeness. (Opp'n at 17) (ECF No. 72.)

1 Finally, the State is engaged in a significant number of related cases in addition to
2 the present case and *Boland*. See *Defending California’s Commonsense Firearms Laws*,
3 CALIFORNIA DEPARTMENT OF JUSTICE, OFFICE OF THE ATTORNEY GENERAL, Sept. 19, 2022,
4 <https://oag.ca.gov/ogvp/2a-cases> (listing twenty-five lawsuits in which the State is
5 currently defending various California gun laws under Second Amendment challenges.)
6 Given the amount of time and resources the State has already spent researching historical
7 analogues in this and similar cases, as well as the posture of this case—on for preliminary
8 injunction with the opportunity to further develop the record on a motion for permanent
9 injunction—the Court respectfully denies the State’s request for additional time.

10 2. Irreparable Harm

11 It is well-established that loss of “the enjoyment of Second Amendment rights
12 constitutes irreparable injury.” *Duncan v. Becerra*, 265 F.Supp.3d 1106, 1135 (S.D. Cal.
13 2017). “[C]onstitutional violations cannot be adequately remedied through damages and
14 therefore generally constitute irreparable harm.” *Am. Trucking Ass’ns v. City of Los*
15 *Angeles*, 559 F.3d 1046, 1059 (9th Cir. 2009)); see also *Ezell v. City of Chicago*, 651 F.3d
16 684, 699 (7th Cir. 2011) (stating infringements of the Second Amendment are irreparable
17 and cannot be compensated by damages). So it is here. The UHA’s CLI, MDM, and
18 microstamping provisions infringe Plaintiffs’ Second Amendment rights, thus causing
19 irreparable harm.

20 3. Balance of Equities and Public Interest

21 At this step, it is necessary to “pay particular regard for the public consequences in
22 employing the extraordinary remedy of injunction.” *Winter*, 555 U.S. at 24. Defendants
23 contend if this Court enjoins enforcement of the UHA, it creates “public safety risks”
24 because “[t]he absence of a chamber load indicator or magazine disconnect mechanism in
25 a semiautomatic pistol increases the risk of accidental discharge and injury to
26 Californians.” (ECF No. 72 at 33.) But grandfathered handguns without CLI, MDM, or
27 microstamping features are already available to Californians. Of the 499 grandfathered
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1 semiautomatic pistols, only 32 have CLI and MDM features. (See ECF No. 72-4, Gonzalez
2 Decl. at ¶ 7.)

3 Defendants also argue “[t]he status quo poses no threat of injury to Plaintiffs, and an
4 injunction would seriously undermine California’s considered effort to improve the safety
5 of handguns sold in California.” (ECF No. 72 at 2.) However, when challenged
6 government action involves the exercise of constitutional rights, “the public interest . . .
7 tip[s] sharply in favor of enjoining” the law. *Klein v. City of San Clemente*, 584 F.3d 1196,
8 1208 (9th Cir. 2009). As discussed, Plaintiffs have demonstrated likely success that the
9 CLI, MDM, and microstamping requirements violate their rights under the Second
10 Amendment. Therefore, the balance of equities and public interest tips in favor of
11 Plaintiffs. A preliminary injunction shall therefore issue.

12 **B. Bond Requirement**

13 When a motion for preliminary injunction is granted, the plaintiff is required to post
14 security “in an amount that the court considers proper to pay the costs and damages
15 sustained by any party found to have been wrongfully enjoined or restrained.” Fed. R. Civ.
16 P. 65(c). District courts have wide discretion in determining the amount of bond. *Save*
17 *Our Sonoran, Inc. v. Flowers*, 408 F.3d 1113, 1126 (9th Cir. 2005). In public interest
18 litigation, “requiring nominal bonds is perfectly proper,” *id.*, and “[c]ourts routinely
19 impose no bond or minimal bond in public interest . . . cases.” *City of South Pasadena v.*
20 *Slater*, 56 F.Supp.2d 1106, 1148 (C.D. Cal. 1999). This is such a case. Accordingly, the
21 Court waives bond.

22 **C. Stay Pending Appeal**

23 Under Federal Rule of Civil Procedure 62(c), the district court has discretion to stay
24 enforcement of an injunction pending appeal. Defendants ask the Court to stay
25 enforcement pending appeal. A stay is not a matter of right and depends on the
26 circumstances of the particular case. *Lair v. Bullock*, 697 F.3d 1200, 1203 (9th Cir. 2012).
27 Courts consider: “(1) whether the stay applicant has made a strong showing that he is
28 likely to succeed on the merits; (2) whether the applicant will be irreparably injured absent

1 a stay; (3) whether issuance of the stay will substantially injure the other parties in the
2 proceeding; and (4) where the public interest lies.” *Nken v. Holder*, 556 U.S. 418, 434
3 (2009) (citation omitted). The first two factors are “most critical” in determining whether
4 a stay is appropriate. *Id.*

5 While Plaintiffs have demonstrated likely success on the merits, and Defendants will
6 not be irreparably injured absent a stay, the Court believes an orderly process is in the best
7 interests of the parties. The UHA has prohibited commercial sales of the handguns at
8 issue for more than a decade. This lawsuit has been pending since November 10, 2020,
9 and the parties have litigated at a leisurely pace since its inception. Everyone was waiting
10 for *Bruen*. Its arrival does not erase the prior pace of this litigation, and need not hasten
11 it now. Moreover, the district court in *Boland* recently enjoined enforcement of the CLI,
12 MDM, and microstamping provisions. *See Boland*, 2023 WL 2588565, at *1. There, the
13 court stayed enforcement of the injunction for fourteen days pending the State’s decision
14 whether to file an appeal. The State filed an emergency motion for partial stay pending
15 appeal of the preliminary injunction issued in *Boland*. *See Boland et al. v. Bonta*, No. 23-
16 55276 (Dkt. No. 2-1) (9th Cir. Mar. 27, 2023). The Ninth Circuit granted the State’s
17 motion, and issued a stay as to the CLI and MDM requirements of the UHA. *Id.* at Dkt.
18 No. 7 at 1. On March 22, 2023, after the decision in *Boland* was filed, this Court held a
19 status conference with the parties. Both parties requested that the Court issue its decision,
20 as this case was filed first and presents issues not addressed in *Boland*. Therefore, the
21 Court issues its decision herein but stays enforcement pending appeal or further hearing
22 on this matter.

23 IV.

24 CONCLUSION AND ORDER


25 For these reasons, the Court hereby **ORDERS** the following: (1) Plaintiffs’ motion
26 for a preliminary injunction is **GRANTED** as to California Penal Code §§ 31910 (b)(4),
27 (5), (6) & (7) (CLI, MDM, microstamping, and three-for-one removal provisions); (2)
28 Plaintiffs’ motion for a preliminary injunction is **DENIED** as to all other challenged

1 provisions of the UHA; (3) Defendants are **ENJOINED** from enforcing California Penal
2 Code §§ 31910 (b)(4), (5), (6) & (7) (CLI, MDM, microstamping, and three-for-one
3 removal provisions); (4) posting of bond is waived; and (5) the preliminary injunction is
4 **STAYED** pending appeal or further hearing on this matter, whichever occurs first.

5 The Court sets the matter for a telephonic status conference on April 14, 2023, at
6 1:30 p.m., at which time the parties shall advise the Court how they wish to proceed.

7 **IT IS SO ORDERED.**

8 Dated: April 3, 2023

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10 Hon. Dana M. Sabraw, Chief Judge
11 United States District Court
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1 on manufacturers as a condition to retention of their handguns on the roster. Plaintiffs
2 further allege the roster will shrink at an accelerated pace in the future because of the
3 UHA’s “three-for-one” roster removal provision, which mandates that for each new roster-
4 compliant handgun added to the roster, three “grandfathered” handguns must be removed
5 in reverse order of their dates of admission to the roster.

6 Plaintiffs argue these roster requirements “all operate together” to ban the retail sale
7 of hundreds of modern “off-roster” handguns in common use and violate their rights to
8 “keep and bear arms” secured by the Second Amendment to the United States Constitution.
9 Despite Plaintiffs’ request to enjoin the entirety of the UHA’s roster requirements, their
10 focus has been on three specific requirements of the UHA and the impact of those
11 requirements on a particular type of handgun: semiautomatic pistols. These types of
12 handguns have been banned from commercial sale in California because they lack three
13 features required by the UHA. Two of the mandated features require that these arms have
14 a chamber load indicator and magazine disconnect mechanism, both of which are designed
15 to prevent accidental discharges and increase gun safety. The third requirement,
16 microstamping, is intended to help law enforcement solve gun-related crimes by allowing
17 quick identification of the handgun used at a crime scene from information imprinted on
18 spent cartridge casings. Defendants argue the California Legislature passed these
19 requirements to further important state interests: gun safety, and general public safety
20 through enhanced criminal investigations.

21 While the topic of gun regulation and its permissible scope is hotly debated in
22 America’s political theater, the role of this Court is to determine whether the roster
23 provisions of the UHA violate Plaintiffs’ Second Amendment rights under United States
24 Supreme Court precedent in *New York State Rifle & Pistol Ass’n v. Bruen*, 142 S. Ct. 2111
25 (2022). *Bruen* abrogated the “means-end” approach used by circuit courts across the
26 country to determine the constitutionality of gun regulations under the Second
27 Amendment, including a Ninth Circuit decision that previously upheld the UHA’s chamber
28 load indicator, magazine disconnect mechanism, and microstamping requirements. *See*

1 *Pena v. Lindley*, 898 F.3d 969 (9th Cir. 2018). Under *Bruen*, when the Second
2 Amendment’s plain text covers an individual’s conduct, the Constitution presumptively
3 protects that conduct, in which case the State “may not simply posit that the regulation
4 promotes an important interest,” such as public safety. 142 S. Ct. at 2126. Rather, to justify
5 its regulation, the State must demonstrate that the regulation is consistent with this Nation’s
6 historical traditions of firearm regulations. *Id.*

7 Under this newly formulated standard, the Court concludes that Plaintiffs’ desire to
8 commercially purchase newer models of semiautomatic handguns in common use is
9 covered by the Second Amendment and presumptively protected. Because the State is
10 unable to show the UHA’s chamber load indicator, magazine disconnect mechanism, and
11 microstamping requirements are consistent with the Nation’s historical arms regulations,
12 Plaintiffs are entitled to a preliminary injunction against the State’s enforcement of those
13 three provisions, which operate to prohibit the commercial sale of these arms, as well as
14 the three-for-one roster removal provision, which depends on the enforceability of those
15 provisions. However, Plaintiffs have not met their burden to show that the UHA’s roster
16 listing requirement, and its fees, safety device, and testing requirements violate their
17 Second Amendment rights. Plaintiffs’ motion for preliminary injunction is therefore
18 granted in part and denied in part.

19 I.

20 BACKGROUND

21 A. California’s Unsafe Handgun Act

22 The UHA regulates the commercial sale of handguns by requiring the California
23 Department of Justice (“CDOJ”) to maintain a “roster” listing all handguns that have been
24 tested by a certified testing laboratory, “have been determined to be *not* unsafe handguns,”
25 and may be lawfully manufactured and sold by licensed firearms dealers in California. Cal.
26 Penal Code § 32015(a) (emphasis added). Under the UHA, all handguns are considered
27 “unsafe” and may not be commercially sold in California unless the CDOJ determines them
28 “not to be unsafe” and authorizes their inclusion on the roster. Manufacturing or selling

1 an “unsafe” handgun, *i.e.*, an “off-roster” handgun, is a violation of the UHA and subjects
2 the offender to misdemeanor criminal and civil penalties, including up to one year
3 imprisonment and fines up to \$10,000. *Id.* § 32000(a)(1)-(3).

4 An “unsafe handgun” is defined as “any pistol, revolver, or other firearm capable of
5 being concealed upon the person” that does not have certain safety features and does not
6 meet firing and drop-safety testing requirements. Cal. Penal Code § 31910. The statute is
7 broken into two subparts: first, it provides that a revolver¹ is deemed “unsafe” unless it
8 meets three specified criteria, *id.* § 31910(a)(1)-(3), and second, it provides that a
9 semiautomatic pistol² is deemed “unsafe” unless it meets six specified criteria. *Id.* §
10 31910(b)(1)-(6). The first three criteria apply to both revolvers and semiautomatic pistols:
11 they must have a mechanical “safety device,”³ and they must satisfy fire testing and drop-
12 safety testing requirements. Those three requirements were first enacted in 1999, *see*
13 California Unsafe Handgun Act, 1999 Cal. Stat. ch. 248 (SB 15), and are currently set forth
14 in Cal. Penal Code §§ 31910 (a)(1)-(3) (revolvers), and (b)(1)-(3) (semiautomatic pistols).

15 Over time, California enacted three more requirements for semiautomatic pistols—
16 in addition to the safety device and testing requirements—for inclusion on the roster. Since
17 2007, semiautomatic pistols must have a chamber load indicator (“CLI”) and magazine
18 disconnect mechanism (“MDM”). *See id.* § 31910(b)(4)-(5). A CLI is a “device that
19 plainly indicates that a cartridge is in the firing chamber.” *Id.* § 16380. An MDM is “a
20 mechanism that prevents a semiautomatic pistol that has a detachable magazine from
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23 ¹ A revolver has a cylinder in the center of the firearm with multiple chambers that hold the ammunition
24 and rotates with each pull of the trigger.

25 ² A semiautomatic handgun holds ammunition in a detachable magazine which, once inserted in the gun,
26 automatically feeds a fresh round into the chamber of the gun with each pull of the trigger and ejected
27 fired round.

28 ³ Revolvers must have a “safety device that, either automatically in the case of a double-action firing
mechanism, or by manual operation in the case of a single-action firing mechanism, causes the hammer
to retract to a point where the firing pin does not rest upon the primer of the cartridge.” Cal. Penal Code
§ 31910(a)(1). Semiautomatic pistols must “have a positive manually operated safety device.” *Id.* §
31910(b)(1).

1 operating to strike the primer of ammunition in the firing chamber when a detachable
2 magazine is not inserted in the semiautomatic pistol.” *Id.* § 16900. Since 2013,
3 semiautomatic pistols also must have “microstamping” capability. “Microstamping” is a
4 set of “microscopic arrays of characters” that are imprinted onto the cartridge case of each
5 fired round which can be used to “identify the make, model, and serial number of the pistol”
6 used at a crime scene. *Id.* § 31910(b)(6)(A).⁴ Accordingly, the UHA limits the
7 manufacture and commercial sale of newer models of semiautomatic handguns to those
8 that have a manually operated safety device, meet firing and drop-safety testing
9 requirements, and have the CLI, MDM, and microstamping features. Stated differently,
10 newer models of semiautomatic handguns that lack these safety features and have not met
11 the testing requirements are deemed “unsafe,” may not be added to the roster, and may not
12 be manufactured or commercially sold in California.

13 The UHA contains a number of exceptions to the ban on commercial sales of
14 handguns without the CLI, MDM and microstamping features. Handguns that were
15 “already listed on the roster” when the CLI, MDM and microstamping requirements
16 became effective are exempt. Cal. Penal Code §§ 31910(b)(4), (b)(5), (b)(6)(A)
17 (“grandfather” provisions). Handguns sold to law enforcement officials, and certain curios
18 or relics are also exempt. *Id.* § 32000(b)(3)-(4). Pistols used in Olympic target shooting
19 are exempt, *id.* § 32105, as are handguns in private party transfers, in which two parties
20 who are not licensed firearms dealers wish to enter into a sale. *Id.* § 32110(a). So, too, are
21 handguns that are delivered for consignment sale or as collateral for a pawnbroker loan,
22 and handguns used solely as props for video production. *Id.* § 32110(f), (h). The UHA
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26 ⁴ The CLI provision applies only to centerfire semiautomatic pistols, not rimfire semiautomatic pistols.
27 See Cal. Penal Code § 31910(b)(4). The MDM and microstamping requirements apply to both centerfire
28 and rimfire semiautomatic pistols. See *id.* §§ 31910(b)(5), (6). Rimfire ammunition is generally lower
velocity, less lethal and smaller than centerfire ammunition. The distinction between rimfire and centerfire
arms or ammunition is not relevant to the determination of this case.

1 does not restrict *possession* of off-roster handguns in the home or elsewhere; rather, its
2 focus is to limit the manufacture and commercial *sale* of such handguns.

3 Manufacturers must also pay an initial \$200 testing fee for a new handgun to be
4 added to the roster. *Id.* § 32015(b)(1); Cal. Code of Regs. tit. 11 (“CCR”), §§ 4070-4072.
5 Once a handgun is added to the roster, it is valid for one year, after which the manufacturer
6 may renew the listing by paying an annual fee. 11 CCR § 4070; *see id.* § 4071. A handgun
7 model may be removed from the roster for a variety of reasons, including if: (1) the annual
8 fee is not paid; (2) the handgun model sold after certification is modified from the model
9 submitted for testing; or (3) the handgun is deemed “unsafe” based on further testing. 11
10 CCR § 4070(c); *see also* Cal. Penal Code § 32015(b)(2) (stating any handgun
11 “manufactured by a manufacturer who . . . fails to pay” the roster fee “may be excluded
12 from the roster.”). In addition, in January 2021, the California Legislature accelerated the
13 removal of semiautomatic handguns from the roster by requiring removal of three such
14 grandfathered handguns for every approved semiautomatic pistol added to the roster
15 (“three-for-one removal provision”). Cal. Penal Code § 31910(b)(7).

16 **B. The Plaintiffs and Their Claim**

17 Plaintiffs are law-abiding individuals, licensed firearm retailers, and organizations,
18 with individual and retail members, who allege the UHA prevents them from exercising
19 their Second Amendment rights to purchase handguns not listed on the roster for self-
20 defense, *i.e.*, off-roster handguns. (Third Amended Complaint (“TAC”) ¶¶ 16, 17-54, 59
21 (alleging the UHA “prevent[s] Plaintiffs . . . from purchasing [off-roster] handguns that are
22 categorically in common use for self-defense and other lawful purposes, and thus violate[s]
23 the Second and Fourteenth Amendments to the United States Constitution.”).)⁵

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26 ⁵ “Strictly speaking, [a state] is bound to respect [an individual’s] right to keep and bear arms because of
27 the Fourteenth Amendment, not the Second.” *Bruen*, 142 S.Ct. at 2137. However, since the protections
28 of the Second Amendment are made applicable to the states through the Due Process Clause of the
Fourteenth Amendment, *McDonald v. Chicago*, 561 U.S. 742 (2010), the Court refers to the claim at issue
here as one under the Second Amendment.

1 Plaintiffs allege that, but for the UHA, they would have available for purchase on
2 the retail market hundreds of these off-roster handguns. (*See* TAC ¶¶ 17-38.) Because of
3 the roster, the number of handguns available for retail sale “is a small fraction of the total
4 number of handgun makes and models commercially available throughout the vast majority
5 of the United States[.]” (*Id.* ¶ 71.) Plaintiffs also allege that each layer of regulation under
6 the UHA has hastened the dramatic shrinkage of handguns available for purchase in
7 California. Plaintiffs allege there were nearly 1,300 makes and models of approved
8 handguns on the roster in 2013, but that the list has steadily declined over the past decade
9 to 815 as of October 24, 2022. (*Id.* ¶ 73.)

10 Plaintiff Lana Rae Renna alleges that but for the UHA she would purchase the Smith
11 & Wesson M&P® 380 SHIELD™ EZ® (*id.* ¶ 18); Danielle Jaymes would purchase a Sig
12 365, G43X, Glock 19 Gen5, Sig P320, and/or a Nighthawk Lady Hawk (*id.* ¶ 21); Laura
13 Schwartz would purchase a Glock 19 Gen5 and/or Springfield Armory Hellcat (*id.* ¶ 23);
14 Michael Schwartz would purchase a Glock 19 Gen5 and/or Springfield Armory Hellcat
15 (*id.* ¶ 25); John Klier would purchase a Glock 19 Gen5 (*id.* ¶ 27); Justin Smith would
16 purchase a CZ P10, Walther Q5 SF, and/or Glock 19 Gen4 and/or Gen5 (*id.* ¶ 29); John
17 Phillips would purchase a Sig Sauer P365, Sig Sauer P320 M17, Glock 17 Gen5 MOS,
18 Fabrique National Herstal 509, and/or Fabrique National Herstal FNX-9 (*id.* ¶ 31); Cheryl
19 Prince would purchase a Sig Sauer P365 (*id.* ¶ 33); Darin Prince would purchase a Sig
20 Sauer P320 AXG Scorpion (*id.* ¶ 35); and Ryan Peterson would purchase a Fabrique
21 National Herstal 509 Tactical, Sig Sauer P220 Legion (10mm), Staccato 2011, Glock 19
22 Gen5, Glock 17 Gen5 MOS, and Wilson Combat Elite CQB 1911 (9mm). (*Id.* ¶ 38.) The
23 retailer Plaintiffs allege that but for the UHA they would purchase at wholesale and “make
24 available for [retail] sale . . . all of the constitutionally protected [off-roster] new handguns
25 on the market that are available outside of California.” (*Id.* ¶¶ 42, 46, 50.) The institutional
26 Plaintiffs promote Second Amendment rights and are filled with individual and retailer
27 members who desire to purchase and sell off-roster handguns. (*Id.* ¶¶ 51-54.)
28

1 All of the handguns identified in the TAC are semiautomatic pistols, not revolvers.
2 While revolvers and semiautomatic pistols are subject to the UHA’s mechanical safety
3 device and firing and drop-safety testing requirements, Cal. Penal Code § 31910(a)(1)-(3)
4 & (b)(1)-(3), the focus of the subject litigation has been on the UHA’s CLI, MDM,
5 microstamping, and three-for-one removal requirements, *id.* § 31910(b)(4)-(7), as those
6 requirements apply only to the peculiar mechanics and operation of semiautomatic pistols,
7 the arms specifically identified in the TAC.

8 Based on these allegations, Plaintiffs filed this action on November 10, 2020. (ECF
9 No. 1.) Plaintiffs initially challenged the UHA, AB 1621, and other state regulations. (*See*
10 *id.*) On January 4, 2021, Plaintiffs filed a FAC, alleging two claims under 42 U.S.C. §
11 1983—one for deprivation of Second Amendment rights, as secured by the Fourteenth
12 Amendment, and one for violation of the Fourteenth Amendment right to equal protection
13 of laws. (ECF No. 10.) Defendants moved to dismiss the FAC, (ECF No. 12), and this
14 Court granted in part and denied in part the motion on April 23, 2021. (ECF No. 17.)
15 Specifically, this Court granted Defendants’ motion and dismissed Plaintiffs’ Second
16 Amendment challenge to the CLI, MDM, and microstamping provisions as “foreclosed”
17 by *Pena v. Lindley*, 898 F.3d 969 (9th Cir. 2018), (ECF No. 17 at 6), and denied the motion
18 as to Plaintiffs’ challenge to the three-for-one roster removal provision. (*Id.* at 9-14)
19 (holding Defendants “have not met their burden to show the imposition of the three-for-
20 one provision is a reasonable fit for their stated [public safety] objective.”)

21 Thereafter, on June 23, 2022, the Supreme Court issued its opinion in *Bruen*, which
22 fundamentally changed Second Amendment jurisprudence. *See United States v. Rahimi*,
23 61 F.4th 443, 450 (5th Cir. 2023) (stating prior two-step means-end inquiry used by circuit
24 courts to analyze laws that might impact Second Amendment is rendered “obsolete” by
25 *Bruen*). In light of *Bruen*, Plaintiffs filed a Second Amended Complaint (“SAC”) (ECF
26 No. 49), and motion for preliminary injunction. (ECF No. 53.) The motion for preliminary
27 injunction targeted portions of AB 1621, which prohibited computer numerical control
28 (“CNC”) milling machines used to make untraceable, non-serialized firearms or parts (*i.e.*,

1 “ghost guns”). (*See id.*) The Court heard argument after a full round of briefing, but prior
2 to any decision on the matter, Plaintiffs withdrew their motion and voluntarily dismissed
3 the AB 1621 claim. (ECF No. 63.)

4 The parties thereafter stipulated that Plaintiffs would file a Third Amended
5 Complaint. (ECF No. 65.) The TAC solely challenges the UHA under the Second and
6 Fourteenth Amendments. (ECF No. 67.) That challenge is now before the Court on the
7 present motion.

8 **C. The Ninth Circuit’s Decision in *Pena v. Lindley***

9 In *Pena*, the Ninth Circuit addressed whether the CLI, MDM, and microstamping
10 provisions of the UHA violated the plaintiffs’ Second Amendment rights using the now
11 obsolete two-step means-end inquiry. 898 F.3d 969 (9th Cir. 2018). Under that approach,
12 the *Pena* court noted it must first consider whether the UHA “burdens conduct protected
13 by the Second Amendment, and if it does, we apply an appropriate level of scrutiny.” *Id.*
14 at 975 (citation and quotations omitted). At the first step, *Pena* assumed without deciding
15 that the CLI, MDM and microstamping provisions of the UHA burdened conduct protected
16 by the Second Amendment. *Id.* at 976. After determining the “UHA does not effect a
17 substantial burden” on the plaintiffs’ Second Amendment rights, *Pena* concluded the
18 appropriate standard of review was “intermediate scrutiny,” *id.* at 979, and then applied
19 that level of scrutiny to determine whether the UHA was reasonably tailored to address the
20 State’s substantial interests in public safety and criminal investigation.

21 Applying that standard, *Pena* focused on a number of factors it believed lessened the
22 severity of the burden on the plaintiffs’ Second Amendment rights, including the plaintiffs’
23 ability under the UHA to “buy an operable handgun suitable for self-defense—just not the
24 exact gun they want,” and the exceptions provided by the UHA to purchase grandfathered
25 guns (without CLI, MDM, and microstamping features) and off-roster guns through private
26 transactions. *Id.* at 978-79. Applying the UHA and its CLI, MDM and microstamping
27 requirements to the plaintiffs’ conduct (i.e., the ability to commercially purchase off-roster
28 semiautomatic handguns), the Ninth Circuit upheld the UHA because the law was

1 reasonably tailored to address the important state interests of public safety and law
2 enforcement investigation. *Id.* at 979-86.

3 Under *Bruen*, however, the two-step means-end inquiry employed by *Pena* is now
4 obsolete. 142 S.Ct. at 2127. As noted, when the Second Amendment’s plain text covers
5 an individual’s conduct, as here, the Constitution presumptively protects that conduct, in
6 which case the state “may not simply posit that the regulation promotes an important
7 interest.” *Id.* at 2126. So today, *Pena* and its analysis of the subject regulations are of
8 limited relevance. Instead, the State must demonstrate the UHA is consistent with this
9 Nation’s historical traditions of firearm regulations. *Id.* With this background in mind, the
10 Court turns to whether Plaintiffs are entitled to a preliminary injunction against
11 enforcement of these provisions of the UHA under the *Bruen* framework.⁶

12 II.

13 DISCUSSION

14 A. Preliminary Injunction

15 Injunctive relief is “an extraordinary remedy that may only be awarded upon a clear
16 showing that the plaintiff is entitled to such relief.” *Winter v. Natural Res. Def. Council,*
17 *Inc.*, 555 U.S. 7, 22 (2008). “The purpose of a preliminary injunction is to preserve the
18 status quo ante litem pending a determination of the action on the merits.” *Boardman v.*
19 *Pac. Seafood Grp.*, 822 F.3d 1011, 1024 (9th Cir. 2016) (internal quotation marks omitted).
20 A preliminary injunction requires Plaintiffs to show that (1) they are likely to succeed on
21 the merits, (2) they are likely to suffer irreparable harm without preliminary relief, and (3)
22 the balance of equities tips in their favor and an injunction is in the public interest. *Winter*,
23 555 U.S. at 20; *Drakes Bay Oyster Co. v. Jewell*, 747 F.3d 1073, 1092 (9th Cir. 2014)
24 (stating balance of equities and public interest merge into one factor when the government

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28 ⁶ See *Miller v. Gammie*, 335 F.3d 889, 893 (9th Cir. 2003) (explaining in situations “where the reasoning
or theory of our prior circuit authority is clearly irreconcilable with the reasoning or theory of intervening
higher authority” district courts are required to “reject the prior circuit opinion as having been effectively
overruled.”).

1 is a party). Likelihood of success on the merits is a “threshold inquiry,” and thus if a
2 movant fails to establish that factor, the court “need not consider the other factors.”
3 *California v. Azar*, 911 F.3d 558, 575 (9th Cir. 2018).

4 Plaintiffs move to enjoin the entirety of the UHA’s roster requirements codified in
5 Cal. Penal Code §§ 31910, 32000(a) and 32015(a),(b)(2). Plaintiffs argue:

6 To be clear, the Plaintiffs contend that the UHA’s roster fees, the testing
7 requirements, and the roster removal provisions all operate together, along
8 with the UHA’s primary mechanisms—the requirements that semiautomatic
9 handguns must have chamber load indicator, magazine disconnect
10 mechanism, and microstamping capability to join the roster[]—to accomplish
11 the [sales] ban.

12 (Reply Br. at 5 (ECF No. 74).) Defendants correctly note that the UHA has many distinct
13 roster provisions, enacted at different times for different purposes, and any relief must be
14 specific. *See Orantes-Hernandez v. Tornburgh*, 919 F.2d 549, 558 (9th Cir. 1990)
15 (explaining “an injunction must be narrowly tailored to give only the relief to which
16 plaintiffs are entitled.”). Here, Plaintiffs have not met their burden to show the UHA’s
17 manufacturer roster fee assessment violates their Second Amendment rights. Plaintiffs are
18 individuals, retail sellers, and nonprofit organizations and foundations consisting of
19 individuals and retail sellers, not manufacturers. It is unclear on the present record how
20 Plaintiffs have standing to complain about fees that must be paid by manufacturers to have
21 their handgun models remain on the roster. Similarly, Plaintiffs have failed to address how
22 the UHA’s firing and drop-safety testing requirements for revolvers and semiautomatic
23 pistols violate their rights. Plaintiffs also presented no argument or evidence that the roster
24 listing requirement *itself* or the mechanical “safety device” requirements for revolvers and
25 semiautomatic pistols violate their rights. Accordingly, the Court denies without prejudice
26 Plaintiffs’ motion for such relief.

27 However, as discussed in detail below, Plaintiffs have shown likely success on their
28 claim that the UHA’s CLI, MDM and microstamping requirements violate their Second
Amendment rights. In addition, because the UHA’s three-for-one removal provision

1 depends on the CLI, MDM, and microstamping provisions, it too is unenforceable. *See*
2 Cal. Penal Code § 31910(b)(7) (stating “for each semiautomatic pistol newly added to the
3 roster,” CDOJ shall “remove from the roster exactly three semiautomatic pistols lacking
4 one or more of the applicable [CLI, MDM and microstamping] features described in [§
5 31910(b)(4)-(6)]”).

6 1. Likelihood of Success on the Merits

7 “A plaintiff seeking a preliminary injunction must establish he is likely to succeed
8 on the merits.” *Winter*, 555 U.S. at 20. Thus, Plaintiffs must show likely success on their
9 claim that the UHA’s CLI, MDM, and microstamping requirements violate their Second
10 Amendment rights. *Bruen* sets out two analytical steps to determine whether a firearm
11 regulation violates an individual’s Second Amendment rights. First, courts must determine
12 whether “the Second Amendment’s plain text covers [the] individual’s conduct.” 142 S.
13 Ct. at 2129-30. If so, then “the Constitution presumptively protects that conduct,” and the
14 government “must justify its regulation by demonstrating that it is consistent with the
15 Nation’s historical traditions of firearm regulation.” *Id.* at 2130. “Only then may a court
16 conclude that the individual’s conduct falls outside the Second Amendment’s ‘unqualified
17 command.’” *Id.* (citation omitted). Under this framework, Plaintiffs must first demonstrate
18 the Second Amendment’s plain text covers their conduct.

19 a. Second Amendment and Plaintiffs’ Conduct

20 The Second Amendment provides: “A well regulated Militia, being necessary to the
21 security of a free State, the right of the people to keep and bear Arms, shall not be
22 infringed.” U.S. Const. amend. II. To determine whether the plain text of the Amendment
23 covers the conduct regulated by the challenged law, it is necessary to “identify and
24 delineate the specific course of conduct at issue.” *National Ass’n for Gun Rights, Inc. v.*
25 *City of San Jose*, --- F.Supp.3d ---, 2022 WL 3083715, at *8 (N.D. Cal. Aug. 3, 2022)
26 (citing *Bruen*, 142 S. Ct. at 2134). The course of conduct at issue here is Plaintiffs’ desire
27 to commercially purchase off-roster semiautomatic handguns that are in common use for
28 self-defense and other lawful purposes.

1 Determining the scope of the Second Amendment and whether it covers the conduct
2 at issue is “rooted in the Second Amendment’s text, as informed by history.” *Bruen*, 142
3 S. Ct. at 2127. In *Bruen*, the Supreme Court interpreted the Second Amendment in light
4 of “historical tradition” and held the Amendment protects all arms “in common use,” and
5 “handguns . . . are indisputably in ‘common use’ for self-defense today.” *Bruen*, 142 S.
6 Ct. at 2143 (citing *District of Columbia v. Heller*, 554 U.S. 570, 627 (2008)) (cleaned up).
7 Because the arms at issue (semiautomatic pistols) are handguns, and handguns are
8 “indisputably in common use” today, *id.*, semiautomatic pistols categorically are “Arms”
9 covered by the Second Amendment. The Amendment does not parse between types, makes
10 and models of arms. *See Heller*, 554 U.S. at 629 (stating “[i]t is no answer to say, as
11 petitioners do, that it is permissible to ban the possession of handguns so long as the
12 possession of other firearms (i.e., long guns) is allowed.”) All handguns are covered, so
13 long as they are in common use. Thus, Plaintiffs’ ability to commercially purchase off-
14 roster semiautomatic handguns falls within the plain text of the Second Amendment and is
15 presumptively protected.

16 Defendants do not dispute that handguns, as a category, are covered by the Second
17 Amendment. Nor do Defendants dispute that “the right to keep arms, necessarily involves
18 the right to purchase them.” *Teixeira v. Cty. of Alameda*, 873 F.3d 670, 678 (9th Cir. 2017)
19 (cleaned up). Rather, Defendants argue that Plaintiffs’ desire to purchase at retail
20 *particular* semiautomatic handguns (those without the CLI, MDM and microstamping
21 features) is not covered by the Second Amendment. In support of this argument,
22 Defendants note the UHA is not a categorical ban on *all* handguns like that in *Heller*, as
23 Plaintiffs have available for purchase on the retail market hundreds of roster-compliant
24 handguns, including single shot handguns,⁷ revolvers and older models of semiautomatic
25 pistols. (ECF No. 72 at 20-21.) Defendants point out that as of December 31, 2022, the
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28 ⁷ A single-shot handgun is capable of holding only a single round of ammunition and must be manually
reloaded with each fired round.

1 roster list included many handguns from which Plaintiffs could choose, including 16
2 single-shot handguns, 314 revolvers and 499 semiautomatic pistols. (*Id.* at 21) (citing
3 Declaration of Salvador Gonzalez ISO Defendants Opposition to Preliminary Injunction
4 (“Gonzalez Decl.”) ¶ 19.) But the *availability* of handguns on the roster for retail purchase
5 does not address in any way whether Plaintiffs’ desire to purchase off-roster semiautomatic
6 handguns is *covered* by the Second Amendment. Instead, the argument focuses on the
7 *burden* imposed on Plaintiffs’ rights, which assumes Plaintiffs’ conduct is protected
8 (covered) by the Amendment. Defendants’ argument is therefore rejected as it fails to
9 address the plain text of the Amendment.⁸

10 Next, Defendants argue the Second Amendment is limited to arms in “common use.”
11 The Supreme Court in *Heller* recognized that the “right to keep and carry” under the
12 Second Amendment is limited to arms “in common use at the time[.]” 554 U.S. at 627
13 (citations omitted), and noted that “limitation is fairly supported by the historical tradition
14 of prohibiting the carrying of ‘dangerous and unusual weapons.’” *Id.* The State does not
15 argue that the off-roster semiautomatic handguns at issue are “dangerous and unusual.”
16 Indeed, many of these handguns are used by law enforcement. Rather, it argues Plaintiffs
17 have failed to show that these handguns are “in common use” and therefore Plaintiffs’
18 conduct is not covered by the Amendment. (ECF No. 72 at 24.) This argument is a stretch
19 under any reasonable assessment.

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⁸ Defendants advance a related non-textual argument that the Second Amendment is “not a right to keep and carry any weapon whatsoever in any manner whatsoever and for whatever purpose[.]” quoting *Heller*, 554 U.S. at 628. (Opp’n at 22) (ECF No. 72.) However, as noted, *Heller* admonishes that “[i]t is no answer to say, as petitioners do, that it is permissible to ban the possession of handguns so long as the possession of other firearms (i.e., long guns) is allowed.” 554 U.S. at 629. Thus, Defendants’ argument that it is constitutionally permissible to prohibit commercial sales of state-of-the-art semiautomatic pistols, so long as Plaintiffs can purchase single shot handguns, revolvers and older grandfathered models of semiautomatic pistols that are shrinking in number and less desirable runs headlong into *Heller*’s admonition. As *Bruen* reiterates, the Second Amendment “is not ‘a second-class right, subject to an entirely different body of rules than the other Bill of Rights guarantees.’” 142 S. Ct at 2156 (quoting *McDonald v. City of Chi., Ill.*, 561 U.S. 742, 780 (2010)).

1 Defendants argue Plaintiffs have not produced any raw data to support the
2 proposition that off-roster handguns are in “common use.” Yet, the Supreme Court has
3 already stated that handguns are “‘the most preferred firearm in the nation to ‘keep’ and
4 use for protection of one’s home and family.’” *Heller*, 554 U.S. at 628-29 (quoting *Parker*
5 *v. District of Columbia*, 478 F.3d 370, 400 (D.C. Cir. 2007)). Indeed, handguns are the
6 “quintessential self-defense weapon[.]” *Heller*, 554 U.S. at 629, and “are indisputably in
7 ‘common use’ for self-defense today.” 142 S. Ct. at 2143. The most popular handguns
8 today are semiautomatic pistols. (ECF No. 71-5, Declaration of John Phillips ISO
9 Plaintiffs’ Motion for Preliminary Injunction (“Phillips Decl.”) ¶¶ 12-18 (stating
10 semiautomatic handguns identified by Plaintiffs in this litigation are top-sellers across the
11 country).) And the roster *itself* shows even older models of grandfathered semiautomatic
12 pistols are the most popular type of handgun in California, far outpacing revolvers: 499 to
13 314. (ECF No. 72 at 21 n.11 (citing Gonzalez Decl. ¶ 19).

14 Plaintiffs submitted several declarations in support of their motion and argument that
15 off-roster handguns are in common use, to which Defendants lodged objections.
16 Discussion of one those declarations suffices to address Defendants’ objections.

17 Declarant John Phillips is president and founder of Poway Weapons & Gear and
18 PWG Range (“PWGG”), a licensed firearms dealership in Poway, California, and operator
19 of one the largest indoor gun ranges in the country. (Phillips Decl. ¶ 2) (stating PWGG
20 serves more than 200,000 people a year in its retail store, more than 80,000 on its ranges
21 for target shooting, and more than 8,000 students for firearms training and education).
22 Phillips is a member of a nationwide buying group with more than 450 retail members in
23 all 50 states, whose members “order more than \$1 billion in firearms annually.” (*Id.* ¶ 5.)
24 Phillips also serves on the retail advisory board of Smith & Wesson Brands, Inc., where he
25 is familiar with market needs and purchasing trends. (*Id.* ¶ 6.) He is versed in the roster,
26 meets with all major firearms manufacturers who visit PWGG to sell their products, and
27 reviews retailers’ online sales portals and authoritative industry publications which identify
28 handguns that are available and commonly used throughout the nation. (*Id.* ¶¶ 6-8.) He is

1 licensed to carry concealed, and he is a trained firearms instructor. (*Id.* ¶ 21.) Based on
2 his training, experience and personal knowledge, Phillips states that the roster has shrunk
3 over the past decade from nearly 1,300 approved handguns to just over 800, (*id.* ¶ 10), and
4 Californians are left to choose from a contracting list of aging handgun models that are
5 inferior to and less desirable than newer models of semiautomatic pistols in terms of
6 ergonomics, reliability, ambidextrous configurations, and safety. (*Id.* ¶¶ 10-13.) He further
7 states the semiautomatic handguns identified by Plaintiffs in this litigation are top-sellers
8 and in common use throughout the country, and the roster bans all of these handguns in
9 addition to “many hundreds, and likely thousands, of other models of handguns in common
10 use throughout the United States[.]” (*Id.* ¶¶ 10-18.)

11 Defendants object to Phillips’s declaration on grounds of improper lay opinion and
12 insufficient evidence to support the witness’s personal knowledge under Federal Rules of
13 Evidence 701 and 602, respectively. Specifically, Defendants object to Phillips’s opinions
14 that the Glock43 is one of the top-selling firearms designed for concealed carry in the
15 country, that the Sig Sauer 320 is the most popular carry gun in the nation, and that those
16 handguns in addition to the Sig 365, Glock 17 Gen 5, FN 509 and FNX-0 are widely sold
17 and possessed outside of California and in common use throughout the country. The
18 objections are overruled as Phillips’s opinions are based on his particular training,
19 experience and personal knowledge in the industry. His opinions are proper lay opinions
20 based on sufficient data, facts and experience. Phillips’s opinions corroborate what is
21 evident—that the roster bans commercial sale of newer models of semiautomatic handguns
22 that are in common use. Therefore, any limitation of the Second Amendment to arms in
23 common use imposed by *Heller* does not assist Defendants because the arms in question
24 are in common use.

25 Finally, Defendants argue the UHA falls within a category of “lawful regulatory
26 measures” identified in *Heller*. The Supreme Court in *Heller* catalogued a number of
27 “presumptively lawful regulatory measures” that are presumed to be consistent with the
28 historical scope of the Second Amendment, including: “longstanding prohibitions on the

1 possession of firearms by felons and the mentally ill, [] laws forbidding the carrying of
2 firearms in sensitive places such as schools and government buildings, [] *laws imposing*
3 *conditions and qualifications on the commercial sale of arms*[,] ... [and laws] prohibiting
4 the carrying of dangerous and unusual weapons.” 554 U.S. at 626-27 (emphasis added).
5 In a single conclusory pronouncement, Defendants argue that because the CLI, MDM, and
6 microstamping requirements of the UHA do not ban possession of handguns and do not
7 bar commercial sales of hundreds of grandfathered handguns on the roster that are suitable
8 for self-defense, the UHA merely “imposes conditions and qualifications on the
9 commercial sale of arms” and “[is] ‘presumptively lawful’” under *Heller*. (ECF No. 72
10 at 23 (quoting *Heller*, 554 U.S. at 626-27).)

11 A one sentence conclusion by Defendants that the provisions of the UHA are
12 presumptively lawful “conditions and qualifications on the commercial sale of arms” is
13 insufficient, particularly in light of *Pena* and persuasive authority to the contrary. In *Pena*,
14 the Ninth Circuit declined to define “the parameters of the Second Amendment’s individual
15 right in the context of commercial sales.” 898 F.3d at 976. *Pena* observed the Ninth Circuit
16 “has strained to interpret the phrase ‘conditions and qualifications on the commercial sale
17 of arms’” and viewed the language as “sufficiently opaque” such that it cannot be relied
18 upon alone. *Id.* at 976 (cleaned up). Judge Bybee, concurring in *Pena*, noted that “the
19 Supreme Court in *Heller* could not have meant that anything that *could* be *characterized*
20 as a condition and qualification on the commercial sale of firearms is immune from more
21 searching Second Amendment scrutiny.” *Id.* at 1007 (original emphasis) (Bybee, J.,
22 concurring). Similarly, in *United States v. Marzzarella*, 614 F.3d 85, 92 n.8 (3d. Cir. 2010),
23 the Third Circuit noted that “[i]f there were somehow a categorical exception for
24 [commercial sales] restrictions, it would follow that there would be no constitutional defect
25 in prohibiting the commercial sale of firearms. Such a result would be untenable under
26 *Heller*.” The Court agrees.

27 In *Hirschfeld v. Bureau of Alcohol, Firearms, Tobacco & Explosives*, 5 F.4th 407
28 (4th Cir. 2021), *vacated as moot on other grounds*, 14 F.4th 322 (4th Cir. 2021), certain

1 federal statutes prohibited licensed firearms dealers from selling handguns and handgun
2 ammunition to anyone under the age of 21. The Fourth Circuit rejected the government’s
3 argument that those federal laws were presumptively lawful regulations as “conditions and
4 qualifications on the commercial sale of arms.” 5 F.4th at 416. It stated, “[a] condition or
5 qualification on the sale of arms is a hoop someone must jump through to *sell* a gun, such
6 as obtaining a license, establishing a lawful premise, or maintaining transfer records.” *Id.*
7 at 416 (original emphasis). *Hirschfeld* noted that the federal laws in question there “operate
8 as a total ban on *buying* a gun from a licensed dealer that has met the required [licensing]
9 conditions and qualifications to sell arms,” *id.* (original emphasis), and therefore declined
10 to find that those laws constituted conditions on commercial sales.⁹

11 *Hirschfeld* reasoned that “a law’s substance, not its form, determines whether it
12 qualifies as a condition on commercial sales.” *Id.* at 416 (citing *United States v. Hosford*,
13 843 F.3d 161, 166 (4th Cir. 2016)). Providing examples of commercial sales laws that turn
14 “a condition or qualification into a functional prohibition” the court referenced: “a Chicago
15 ordinance that allowed firearm transfers only outside city limits;” a “ban on firing ranges
16 within city limits” that was “a serious encroachment” on law-abiding citizens of Chicago
17 from “engaging in target practice in the controlled environment of a firing range;” and “a
18 commercial zoning and distancing law [that] worked in tandem to functionally preclude
19 any gun ranges, thus severely restricting Second Amendment rights.” *Hirschfeld*, 5 F.4th
20 at 416 (citations and quotations omitted).

21 Here, like the examples cited in *Hirschfeld*, the CLI, MDM, and microstamping
22 provisions of the UHA operate as a “functional prohibition.” Collectively they prohibit the
23 commercial sale of a large subset of handguns in common use—hundreds of state-of-the-

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26 ⁹ *But see NRA v. Bondi*, --- F.4th ---, 2023 WL 2484818, at *2 (11th Cir. Mar. 9, 2023) (stating a Florida
27 statute prohibiting persons under the age of 21 from buying firearms is a law imposing conditions and
28 qualifications on the commercial sale of firearms). Although the court stated the Florida statute is an
example of a commercial sales regulation, it did not further elaborate and instead assumed the “‘Second
Amendment’s plain text’ covers 18-to-20-year-olds when they buy firearms.” *Id.* at *6.

1 art semiautomatic pistols—and have done so for more than a decade, thus precluding law-
2 abiding citizens from purchasing these arms on the retail market for lawful purposes. These
3 handguns are sold throughout the United States, in 47 states. California is a distinct outlier.
4 If the commercial sales limitation identified in *Heller* were interpreted as broadly as the
5 State suggests, the exception would swallow the Second Amendment. States could impose
6 virtually any condition or qualification on the sale of any arm covered by the Second
7 Amendment, no matter how prohibitory. The Court, therefore, declines the State’s
8 invitation to characterize the CLI, MDM, and microstamping requirements as a law merely
9 imposing conditions and qualifications on the sales of arms. It is undisputed that there are
10 no commercially available semiautomatic handguns manufactured in the United States that
11 have the CLI, MDM and microstamping features. (ECF No. 71-5; Phillips Decl., ¶ 9.) “As
12 a result, literally no new models of [semiautomatic handguns] have been added to the
13 [r]oster since 2013.”¹⁰ (*Id.*) Accordingly, the Court rejects Defendants’ argument and
14 finds these provisions of the UHA are not regulations that merely impose conditions and
15 qualifications on the commercial sales of arms but operate collectively as an outright
16 prohibition on commercial sales of a wide segment of modern arms in common use for
17 self-defense and other lawful purposes.¹¹

18 For these reasons, the Court concludes Plaintiffs’ desire to purchase the arms in
19 question on the retail market falls within the plain text of the Second Amendment and is
20 not subject to any presumptively lawful exception identified in *Heller*. As such, Plaintiffs’
21 conduct is presumptively protected and the burden shifts to Defendants to justify the UHA
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24 ¹⁰ Aside from the UHA exemptions for grandfathered handguns and private sales, Defendants
25 acknowledge Plaintiffs can only purchase on the retail market “revolver[s], non-semiautomatic pistol[s],
26 [and] any firearm that is not a handgun.” See Opp’n at 22 (ECF No. 72) (emphasis added). It is also
27 undisputed that private sales of off-roster handguns to ordinary people are generally limited to supplies
28 (and sales) from law enforcement officials and people who move from out of state into California with an
off-roster handgun. Those sales opportunities are few in number and carry a significant price markup
compared to retail sales.

¹¹ The parties did not address the UHA’s roster fee requirement and whether it falls within the
presumptively lawful category of “conditions and qualifications on the commercial sale of arms.”

1 by proffering historically analogous firearms regulations. *See Baird v. Bonta*, --- F.Supp.3d
2 ---, 2022 WL 17542432, at *6 (E.D. Cal. Dec. 8, 2022) (stating for a preliminary injunction
3 plaintiffs bear the burden of proving the textual analysis under *Bruen* and defendants bear
4 the burden of proving historical analogues under *Bruen*).

5 *b. Historical Precedent*

6 The State has the burden of showing relevant “historical precedent from before,
7 during, and even after the founding [that] evinces a comparable tradition of regulation.”
8 *Bruen*, 142 S. Ct. at 2131-32. The State need not identify a “historical *twin*,” for a “well-
9 established and representative historical *analogue*” is sufficient. *Id.* at 2133 (original
10 emphasis). “[W]hether modern and historical regulations impose a comparable burden on
11 the right of armed self-defense and whether that burden is comparably justified are central
12 considerations when engaging in an analogical inquiry.” *Bruen*, 142 S.Ct. at 2133
13 (citations omitted). Thus, *Bruen* “distilled two metrics for courts to compare the
14 Government’s proffered analogues against the challenged law: *how* the challenged law
15 burdens the right to armed self-defense, and *why* the law burdens that right.” *Rahimi*, 61
16 F.4th at 454 (citing *Bruen*, 142 S. Ct. at 2133). Despite the need to assess the how and
17 why, *Bruen* cautioned “[t]his does not mean that courts may engage in independent means-
18 end scrutiny under the guise of an analogical inquiry.” *Bruen*, 142 S. Ct. at 2133 n.7. The
19 key question, therefore, is whether the challenged law, here the CLI, MDM, and
20 microstamping provisions of the UHA, and the State’s proffered analogues are “relevantly
21 similar.” *Id.* at 2132.

22 The analogical inquiry begins with determining “how” and “why” the UHA
23 “burden[s] a law-abiding citizen’s right to armed self-defense.” *Id.* at 2133. The UHA (1)
24 prohibits the commercial sale of semiautomatic handguns, that (2) lack CLI, MDM, and
25 microstamping technology. The first aspect of the UHA goes to *how* the statute
26 accomplishes its goal (prohibiting retail sales of newer models of semiautomatic pistols),
27 and the second goes to its goal, the *why* (public safety and furthering law enforcement
28 investigative tools). To sustain the UHA’s burden on Plaintiffs’ Second Amendment

1 rights, the State must proffer “relevantly similar” historical regulations that imposed “a
2 comparable burden on the right of armed self-defense” that were also “comparably
3 justified.” *See Rahimi*, 61 F.4th at 455 (citing *Bruen*, 142 S.Ct. at 2136).

4 Defendants argue that states “have regulated for firearm safety, particularly to
5 prevent accidents and unintentional detonations, since the earliest days of the republic,”
6 (Opp’n at 27), and cite to four historical laws and a declaration from Dr. Saul Cornell, the
7 Paul and Diane Guenther Chair in American History at Fordham University, to meet its
8 burden. Initially, Defendants point to an 1805 Massachusetts law that required certain guns
9 to be inspected, marked, and stamped by an inspector (“prover”) before they could be sold.
10 (ECF No. 72-5, Cornell Decl. at ¶ 33; *id.* at Ex. 3.)¹² The law required that the prover test
11 certain muskets and pistols to ensure they safely discharged. 1805 Mass. Acts 588, § 1.
12 The provers duty “shall be to prove” that the “musket barrels and pistol barrels” are
13 “sufficiently ground, bored and breeched,” and to prove the musket and pistol barrels “will
14 carry a twenty-four-pound shot” 80 yards and 70 yards, respectively, without the barrels
15 “burst[ing]” or “in no respect fail[ing.]” *Id.* If the firearm passed the test, the prover would
16 stamp his initials and the year of inspection on the firearm. *Id.*

17 The “why” of the 1805 law is to ensure off-brand firearms operated safely—to
18 prevent “introduct[ion] [of firearms] into use which are unsafe.” *Id.* at Preamble. In this
19 respect, the goal of the law is similar to the CLI and MDM requirements under the UHA:
20 public safety. But “how” the 1805 law accomplished its goal is entirely different from the
21 CLI, MDM, and microstamping requirements of the UHA. While the 1805 law prohibits
22 introduction of firearms that failed inspection (and are “unsafe”), it did not apply to
23 Springfield Armory, which produced the majority of guns in the state,¹³ and it did not
24

25
26 ¹² In *Boland, et al. v. Bonta*, 22-cv-1421, 2023 WL 2588565, at *6-7 (C.D. Cal. Mar. 20, 2323), the State
27 proffered additional proving laws as comparators to the challenged UHA provisions. *See id.* ECF Nos.
28 56 at 13-14; 56-3, Ex. 31 at 1-15 (noting Continental Army, Rhode Island, New Hampshire, New Jersey,
Maryland, Maine, and Pennsylvania had similar proving laws to the 1805 Massachusetts law).

¹³ Defendants acknowledge that at the time in Springfield, Massachusetts, most guns were manufactured
by Springfield Armory, which was under federal control. (ECF No. 72 at 27-28; Cornell Decl. at ¶ 32.)

1 preclude the purchase of firearms manufactured out of state. The 1805 law required only
2 that all other muskets and pistols be “proved” to ensure they fired and discharged safely
3 without malfunctioning, in which case the prover would stamp the firearm and approve it
4 for commercial sale. *Id.* § 3.¹⁴ But the 1805 law stopped there. It did not prescribe
5 particular safety features, nor did it require manufactures to add safety features to already
6 safe arms. Requiring the *testing* of firearms to ensure they fired safely without
7 malfunctioning is significantly different from requiring manufacturers to *add* mechanical
8 safety features to arms in common use that are indisputably safe and operate as designed
9 for self-defense.

10 In addition, the “why” of the 1805 stamping requirement is not comparable to
11 microstamping under the UHA, as the former requirement served only to verify that the
12 arm had been tested, was safe—in that it fired without barrel bursting or otherwise failing,
13 and could be sold. California’s microstamping requirement is designed to assist law
14 enforcement in criminal investigations, not firearm discharge safety. Defendants concede
15 this point. (Opp’n Br. at 5) (“Microstamping is intended to provide important investigative
16 leads in solving gun-related crimes by allowing law enforcement personnel to quickly
17 identify information about the handgun from spent cartridge casings found at the crime
18 scene.”) (citation and quotations omitted).

19 The comparable burden on the right to self-defense is notable too. As noted, the
20 1805 law allowed purchasers to buy firearms from Springfield Armory and out of state
21 manufacturers, without proofing. In contrast, the CLI, MDM, and microstamping
22 provisions prohibit retail sales in the state of a significant segment of the most common
23 self-defense firearm sold in America today. Accordingly, the State has not shown that the
24

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27
28 ¹⁴ In this respect, the 1805 law and its barrel safety testing requirements may be similar to the UHA provisions that require handguns to meet firing and drop-safety testing requirements. The Court reserves ruling on that issue as it was not briefed by the parties. Similarly, the parties did not address the UHA’s safety device requirement.

1 1805 Massachusetts law is relevantly similar or imposed a comparable burden on the right
2 of armed self-defense to the three UHA provisions at issue.

3 Next, Defendants point to three examples of laws regulating the storage of weapons
4 with or near gun powder, and the storage of gun powder.¹⁵ The Court considers these
5 examples in tandem since the goal of these laws, the “why,” is the same. First is a 1783
6 Massachusetts law that prohibited storing a loaded weapon in a home. Act of Mar. 1, 1783,
7 ch. XIII, 1783 Mass. Acts 37, An Act in Addition to the Several Acts Already Made for
8 the Prudent Storage of Gun Powder within the Town of Boston. Defendants state the text
9 of the statute is clear—to prevent “the unintended discharge of firearms [which] posed a
10 serious threat to life and limb.” (ECF No. 72 at 28.) However, that characterization is not
11 consistent with the Supreme Court’s assessment, where it addressed the same law, and
12 stated the 1783 Massachusetts law “text and its prologue[]makes clear that the purpose of
13 the prohibition was to eliminate the danger to firefighters posed by the depositing of loaded
14 Arms in buildings.” *Heller*, 554 U.S. at 631. The goal of the statute, the why, is to guard
15 against fires and protect firefighters in times when highly combustible gun powder was
16 exposed to kerosine lanterns and candles. *See 2 Acts And Laws Of The Commonwealth*
17 *Of Massachusetts* 120 (1890) (stating “the depositing of loaded Arms in the Houses [of
18 Boston] is dangerous to the Lives of those who are disposed to exert themselves when a
19 Fire happens to break out”); *see also Jackson v. City & Cnty. of San Francisco*, 746 F.3d
20 953, 963 (9th Cir. 2014) (stating Boston’s firearm-and-gunpowder storage law is
21 historically distinct from the challenged firearm regulation in light of *Heller*).

22 Defendants also cite to a 1792 New York City statute, which granted the government
23 authority to search for gun powder and transfer gun powder to the public magazine for safe
24

25
26 ¹⁵ Here, too, the State in *Boland* proffered additional laws regarding storage of weapons with or near gun
27 powder, and the storage of gunpowder. *See Boland*, 2023 WL 2588565, at *7-8, 8:22-cv-1421, ECF No.
28 56-3, Ex. 31 at 1-15 (C.D. Cal.) (noting gunpowder regulations in New Jersey, Rhode Island,
Pennsylvania, New Hampshire, Connecticut, Iowa, Indiana, Ohio, Vermont, Tennessee, Nebraska,
Kentucky, California, and Oklahoma).

1 storage. An Act to Prevent the Storage of Gun Powder, within in Certain Parts of New
2 York City, 2 LAWS OF THE STATE OF NEW-YORK, COMPRISING THE CONSTITUTION, AND
3 THE ACTS OF THE LEGISLATURE, SINCE THE REVOLUTION, FROM THE FIRST TO THE
4 FIFTEENTH SESSION, INCLUSIVE at 191-2 (Thomas, Greenleaf, ed., 1792). The statute
5 “prevent[ed] the storing of Gun-Powder, within certain Parts of the City of New-York.”
6 *Id.* Defendants additionally cite to an 1821 Maine law, which authorized government
7 officials to enter any building in any town to search for gun powder. 1821 Me. Laws 98,
8 An Act for the Prevention of Damage by Fire and the Safe Keeping of Gun Powder, chap.
9 25, § 5. Its purpose: “Prevention of Damage by Fire.” *Id.* Like the Massachusetts law,
10 the New York City and Maine laws regulated gun powder “due to the substance’s
11 dangerous potential to detonate if exposed to fire or heat.” (ECF No. 72-5, Cornell Decl.
12 at ¶ 42.)

13 The 1783 Massachusetts law, 1792 New York City statute, and 1821 Maine law are
14 not analogues to the challenged provisions of the UHA. Those laws regulated the storage
15 of gunpowder and loaded firearms with gun powder for fire-safety reasons, not gun-
16 operation safety reasons. Thus, the goal of these statutes is fire-safety (the why), and that
17 goal is addressed by controlling gun powder and loaded gun storage (the how). These
18 statutes “do not remotely burden the right of self-defense as much as an absolute ban on
19 handguns.” *Heller*, 554 U.S. at 632. While the CLI, MDM, and microstamping provisions
20 of the UHA are not an absolute ban on handguns, the provisions operate to ban commercial
21 acquisition of a significant segment of popular handguns designed for self-defense. The
22 foregoing fire-safety laws are not “relevantly similar” to the UHA roster provisions, and
23 they impose a far less “comparable burden” on Plaintiffs’ Second Amendment rights to
24 armed self-defense than does the UHA.

25 Defendants have not met their burden of presenting relevantly similar, historically
26 comparable analogues to the UHA’s CLI, MDM, and microstamping provisions. Plaintiffs
27 have therefore demonstrated likely success on the merits of these claims.

28

1 c. Scope of Injunction

2 Any relief granted in a preliminary injunction must be narrowly tailored. *See*
3 *Orantes-Hernandez*, 919 F.2d at 558. Having determined the CLI, MDM, and
4 microstamping provisions of the UHA violate Plaintiffs’ Second Amendment rights, the
5 Court must address whether the remaining UHA provisions at issue are severable. If a
6 challenged statute contains “unobjectionable provisions separable from those found to be
7 unconstitutional,” the court must sever such provisions. *Alaska Airlines, Inc. v. Brock*, 480
8 U.S. 678, 684 (1987) (cleaned up). “A court should refrain from invalidating more of [a]
9 statute than is necessary.” *Id.* “The standard for determining the severability of an
10 unconstitutional provision is well established: Unless it is evident that the Legislature
11 would not have enacted those [unconstitutional] provisions ... independently of that which
12 is not, the invalid part may be dropped if what is left is fully operative as a law.” *Id.*
13 (cleaned up). In conducting this inquiry, a court must ask “whether the law remains fully
14 operative without the invalid provisions.” *Murphy v. Nat. Collegiate Athletic Ass’n*, 138 S
15 Ct. 1461, 1482 (2018) (cleaned up).

16 The initial iteration of the UHA in 1999 deemed revolvers and semiautomatic pistols
17 “unsafe” if they lacked a safety device and did not meet firing and drop-safety testing
18 requirements. Cal. Penal Code § 12126(a)(1)-(3), (b)(1)-(3). Those provisions stood
19 independently for many years, and later were incorporated in more recent iterations of the
20 UHA. *See id.* § 31910(a)(1)-(3), (b)(1)-(3). As discussed, the Legislature thereafter
21 enacted the CLI and MDM provisions in 2003, effective at a later date, *see* Sen. Bill No.
22 489 (Cal. 2003-2004 Reg. Sess.), § 1, and the microstamping provision in 2007, also
23 effective at a later date. *See* Assem. Bill No. 1471 (Cal. 2007-2008 Reg. Sess.), § 2. It is
24 clear the Legislature would have enacted, and in fact did enact, the earlier provisions
25 without the CLI, MDM and microstamping provisions. Therefore, the CLI, MDM, and
26 microstamping provisions, Cal. Penal Code § 31910(b)(4)-(6), are severable from the rest
27 of the UHA and may be separately enjoined.

28

1 Under the three-for-one roster removal provision, for each approved semiautomatic
2 pistol added to the roster, “three semiautomatic pistols lacking one or more of the
3 applicable features described in paragraphs (4), (5), and (6) of subdivision (b)[,]” are
4 removed. Cal. Penal Code § 31910(b)(7). Paragraphs (4), (5), and (6) of subdivision (b)
5 refer to the CLI, MDM, and microstamping provisions, respectively. *Id.* § 31910(b)(4)-
6 (6). The text of subdivision (b)(7) makes clear it was “obviously meant to work together”
7 with its companion subdivisions (b)(4)–(6). *Murphy*, 138 S. Ct. at 1483. Therefore, the
8 three-for-one removal provision cannot be severed as it is not “fully operative without the
9 invalid provisions.” *Id.* at 1482. As such, the California Legislature could not have
10 intended for it to stand independently of the invalid provisions. The three-for-one removal
11 provision is therefore enjoined.

12 Unless it is evident the Legislature would not have enacted the rest of the law, “the
13 invalid provisions may be dropped if what is left is fully operative as a law.” *New York v.*
14 *United States*, 505 U.S. 144, 186 (1992). Here, the remaining UHA roster provisions are
15 fully operative without the CLI, MDM, microstamping, and three-for-one removal
16 provisions. There is no indication the Legislature would not have enacted the remaining
17 roster provisions without the invalid provisions. Therefore, the invalid provisions, Cal.
18 Penal Code §§ 31910(b)(4)-(7), are severed and separately enjoined.¹⁶

19 *d. Discovery Request*

20 Defendants request additional time to conduct historical research and consult
21 additional experts. However, Defendants have had three months to mount a defense since
22 the filing of the TAC. In addition, *Bruen* was decided on June 23, 2022, more than 19
23 months before Defendants’ Opposition Brief was filed in this matter on January 27, 2023.
24 And in light of *Bruen*, the parties stipulated in July 2022 to vacating the scheduling order
25

26
27 ¹⁶ Because the three-for-one roster removal provision is not severable from the CLI, MDM and
28 microstamping provisions, the Court declines to address Defendants’ arguments that Plaintiffs’ challenge
to roster removal provision fails for lack of standing and ripeness. (Opp’n at 17) (ECF No. 72.)

1 and the filing of a Second Amended Complaint by Plaintiffs. (ECF No. 45.) The need for
2 a historical deep dive to find regulations comparable to the UHA is no surprise to
3 Defendants. In fact, Defendants were presented with this exact task in November 2022 in
4 *Boland, et al. v. Bonta*, No. 8:22-cv-1421 (C.D. Cal.). Defendants there briefed a nearly
5 identical challenge under the Second Amendment to the CLI, MDM, and microstamping
6 requirements of the UHA and appeared for a preliminary injunction hearing with the same
7 expert they retained here, Dr. Cornell. Following that hearing, Defendants provided two
8 additional rounds of briefing on the merits. The district court in *Boland* issued its decision
9 on March 20, 2023, and provided a reasoned analysis and similar conclusions to those
10 reached by this Court.

11 Defendants also point to authorities cited to the district court in *Pena v. Lindley*, No.
12 2:09-cv-01185 (E.D. Cal.) (ECF No. 76), which demonstrate the CLI and MDM
13 technology has existed since the late 1800's and 1910, respectively. Defendants assert
14 additional time is needed to evaluate those authorities. However, those authorities simply
15 note the existence of CLI and MDM technology, not regulations mandating use of that
16 technology on arms then for sale.

17 Finally, the State is engaged in a significant number of related cases in addition to
18 the present case and *Boland*. See *Defending California's Commonsense Firearms Laws*,
19 CALIFORNIA DEPARTMENT OF JUSTICE, OFFICE OF THE ATTORNEY GENERAL, Sept. 19, 2022,
20 <https://oag.ca.gov/ogvp/2a-cases> (listing twenty-five lawsuits in which the State is
21 currently defending various California gun laws under Second Amendment challenges.)
22 Given the amount of time and resources the State has already spent researching historical
23 analogues in this and similar cases, as well as the posture of this case—on for preliminary
24 injunction with the opportunity to further develop the record on a motion for permanent
25 injunction—the Court respectfully denies the State's request for additional time.

26 2. Irreparable Harm

27 It is well-established that loss of “the enjoyment of Second Amendment rights
28 constitutes irreparable injury.” *Duncan v. Becerra*, 265 F.Supp.3d 1106, 1135 (S.D. Cal.

1 2017). “[C]onstitutional violations cannot be adequately remedied through damages and
2 therefore generally constitute irreparable harm.” *Am. Trucking Ass’ns v. City of Los*
3 *Angeles*, 559 F.3d 1046, 1059 (9th Cir. 2009)); *see also Ezell v. City of Chicago*, 651 F.3d
4 684, 699 (7th Cir. 2011) (stating infringements of the Second Amendment are irreparable
5 and cannot be compensated by damages). So it is here. The UHA’s CLI, MDM, and
6 microstamping provisions infringe Plaintiffs’ Second Amendment rights, thus causing
7 irreparable harm.

8 3. Balance of Equities and Public Interest

9 At this step, it is necessary to “pay particular regard for the public consequences in
10 employing the extraordinary remedy of injunction.” *Winter*, 555 U.S. at 24. Defendants
11 contend if this Court enjoins enforcement of the UHA, it creates “public safety risks”
12 because “[t]he absence of a chamber load indicator or magazine disconnect mechanism in
13 a semiautomatic pistol increases the risk of accidental discharge and injury to
14 Californians.” (ECF No. 72 at 33.) But “grandfathered” handguns without CLI, MDM, or
15 microstamping features are already available to Californians. Of the 499 grandfathered
16 semiautomatic pistols, only 32 have CLI and MDM features. (*See* ECF No. 72-4, Gonzalez
17 Decl. at ¶ 7.)

18 Defendants also argue “[t]he status quo poses no threat of injury to Plaintiffs, and an
19 injunction would seriously undermine California’s considered effort to improve the safety
20 of handguns sold in California.” (ECF No. 72 at 2.) However, when challenged
21 government action involves the exercise of constitutional rights, “the public interest . . .
22 tip[s] sharply in favor of enjoining” the law. *Klein v. City of San Clemente*, 584 F.3d 1196,
23 1208 (9th Cir. 2009). As discussed, Plaintiffs have demonstrated likely success that the
24 CLI, MDM, and microstamping requirements violate their rights under the Second
25 Amendment. Therefore, the balance of equities and public interest tips in favor of
26 Plaintiffs. A preliminary injunction shall therefore issue.

1 **B. Bond Requirement**

2 When a motion for preliminary injunction is granted, the plaintiff is required to post
3 security “in an amount that the court considers proper to pay the costs and damages
4 sustained by any party found to have been wrongfully enjoined or restrained.” Fed. R. Civ.
5 P. 65(c). District courts have wide discretion in determining the amount of bond. *Save*
6 *Our Sonoran, Inc. v. Flowers*, 408 F.3d 1113, 1126 (9th Cir. 2005). In public interest
7 litigation, “requiring nominal bonds is perfectly proper,” *id.*, and “[c]ourts routinely
8 impose no bond or minimal bond in public interest ... cases.” *City of South Pasadena v.*
9 *Slater*, 56 F.Supp.2d 1106, 1148 (C.D. Cal. 1999). This is such a case. Accordingly, the
10 Court waives bond.

11 **C. Stay Pending Appeal**

12 Under Federal Rule of Civil Procedure 62(c), the district court has discretion to stay
13 enforcement of an injunction pending appeal. Defendants ask the Court to stay
14 enforcement pending appeal. A stay is not a matter of right and depends on the
15 circumstances of the particular case. *Lair v. Bullock*, 697 F.3d 1200, 1203 (9th Cir. 2012).
16 Courts consider: “(1) whether the stay applicant has made a strong showing that he is
17 likely to succeed on the merits; (2) whether the applicant will be irreparably injured absent
18 a stay; (3) whether issuance of the stay will substantially injure the other parties in the
19 proceeding; and (4) where the public interest lies.” *Nken v. Holder*, 556 U.S. 418, 434
20 (2009) (citation omitted). The first two factors are “most critical” in determining whether
21 a stay is appropriate. *Id.*

22 While Plaintiffs have demonstrated likely success on the merits, and Defendants will
23 not be irreparably injured absent a stay, the Court believes an orderly process is in the best
24 interests of the parties. The UHA has prohibited commercial sales of the handguns at
25 issue for more than a decade. This lawsuit has been pending since November 10, 2020,
26 and the parties have litigated at a leisurely pace since its inception. Everyone was waiting
27 for *Bruen*. Its arrival does not erase the prior pace of this litigation, and need not hasten
28 it now. Moreover, the district court in *Boland* recently enjoined enforcement of the CLI,

1 MDM, and microstamping provisions. *See Boland*, 2023 WL 2588565, at *1. There, the
2 court stayed enforcement of the injunction for fourteen days pending the State's decision
3 whether to file an appeal. The State has since filed an emergency motion for partial stay
4 pending appeal of the preliminary injunction issued in *Boland*. *See Boland et al. v. Bonta*,
5 No. 23-55276 (Dkt. No. 2-1) (9th Cir. Mar. 27, 2023). On March 22, 2023, after the
6 decision in *Boland* was filed, this Court held a status conference with the parties. Both
7 parties requested that the Court issue its decision, as this case was filed first and presents
8 issues not addressed in *Boland*. Therefore, the Court issues its decision herein but stays
9 enforcement pending appeal or further hearing on this matter.

10 **IV.**

11 **CONCLUSION AND ORDER**

12 For these reasons, the Court hereby **ORDERS** the following: (1) Plaintiffs' motion
13 for a preliminary injunction is **GRANTED** as to California Penal Code §§ 31910 (b)(4),
14 (5), (6) & (7) (CLI, MDM, microstamping, and three-for-one removal provisions); (2)
15 Plaintiffs' motion for a preliminary injunction is **DENIED** as to all other challenged
16 provisions of the UHA; (3) Defendants are **ENJOINED** from enforcing California Penal
17 Code §§ 31910 (b)(4), (5), (6) & (7) (CLI, MDM, microstamping, and three-for-one
18 removal provisions); (4) posting of bond is waived; and (5) the preliminary injunction is
19 **STAYED** pending appeal or further hearing on this matter, whichever occurs first.

20 The Court sets the matter for a telephonic status conference on April 14, 2023, at
21 1:30 p.m., at which time the parties shall advise the Court how they wish to proceed.

22 **IT IS SO ORDERED.**

23 Dated: March 31, 2023

24 

25 Hon. Dana M. Sabraw, Chief Judge
26 United States District Court
27
28

No. 23-55367

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

LANA RAE RENNA, et al.,
Plaintiffs-Appellees,

v.

ROB BONTA, in his official capacity as Attorney General of California; and
ALISON MENDOZA, in her official capacity as Director of the Department of Justice
Bureau of Firearms,
Defendants-Appellants.

**On Appeal from the United States District Court
for the Southern District of California**
No. 3:20-cv-02190-DMS-DEB
The Honorable Dana M. Sabraw, Judge

**EXCERPTS OF RECORD
VOLUME 2 OF 3**

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May 12, 2023

ER-063

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1 SAN DIEGO, CALIFORNIA - FRIDAY, FEBRUARY 10, 2023 - 1:30 P.M.

2 * * *

3 **THE CLERK:** CALLING NO. 17 ON THE CALENDAR, CASE NO
4 20CV2910, RENNA ET AL V BECERRA ET AL.

5 **THE COURT:** GOOD AFTERNOON. MAY I HAVE APPEARANCES,
6 PLEASE?

7 **MR. BENBROOK:** GOOD AFTERNOON, YOUR HONOR. BRADLEY
8 BENBROOK FOR THE RENNA PLAINTIFFS.

9 **THE COURT:** THANK YOU.

10 **MS. BOUTIN:** GOOD AFTERNOON, YOUR HONOR. GABRIELLE
11 BOUTIN ON BEHALF OF THE ATTORNEY GENERAL.

12 **THE COURT:** GOOD AFTERNOON.

13 I HAVE READ EVERYTHING, I APPRECIATE THE BRIEFING.
14 I HAVE A COUPLE OF PRELIMINARY QUESTIONS.

15 PRELIMINARY INJUNCTION VERSUS SUMMARY JUDGMENT. I
16 UNDERSTAND THE PLAINTIFFS WOULD BE CONTENT TO GO EITHER WAY.
17 YOUR POSITION IS THERE ARE REALLY NO DISPUTED FACTS. THE
18 COURT CAN TAKE THIS PRELIMINARY INJUNCTION, COLLAPSE THE
19 HEARING INTO A PERMANENT INJUNCTION HEARING TODAY, OR TREAT IT
20 AS A RULE 56 MOTION AND ENTER SUMMARY JUDGMENT.

21 **MR. BENBROOK:** THAT'S RIGHT, YOUR HONOR. THAT IS
22 OUR POSITION. AND I AM HAPPY TO EXPAND ON WHY IT IS
23 APPROPRIATE TO GO TO THE MERITS RIGHT NOW, IF YOU ARE READY
24 FOR THAT, OR I CAN WAIT.

25 **THE COURT:** LET ME INQUIRE OF DEFENSE COUNSEL.

1 WHAT ARE THE DISPUTED FACTS? YOU HAD MENTIONED THAT
2 IF IT IS CONVERTED TO A RULE 56 MOTION YOU WOULD NEED
3 ADDITIONAL TIME FOR EXPERT TESTIMONY AND HERE --

4 **MS. BOUTIN:** ONLY POSSIBLY, YOUR HONOR. I MEAN, WE
5 BELIEVE THAT, AS A MATTER OF LAW, THEIR CLAIM FAILS. SO FOR
6 THAT REASON WE CERTAINLY DON'T THINK THAT THEY ARE ENTITLED TO
7 PRELIMINARY INJUNCTION.

8 SO THERE IS ESSENTIALLY A TWO-PRONG TEST IN BRUEN.
9 WE BELIEVE THIS SHOULD BE DECIDED AS A MATTER OF LAW ON THE
10 FIRST PRONG. ON THE SECOND PRONG WE ALSO BELIEVE WE SHOULD
11 PREVAIL ON THE MOTION.

12 BUT IF YOUR HONOR BELIEVES THAT THE STATE HAS NOT
13 SHOWN ENOUGH EVIDENCE, IN THAT EVENT WE WOULD ASK FOR
14 ADDITIONAL TIME FOR MORE EXPERT DISCOVERY. AND WE WOULD BE
15 PREPARED TO TALK ABOUT WHY THAT WOULD BE NECESSARY.

16 **THE COURT:** WHAT WOULD THAT EXPERT DISCOVERY LOOK
17 LIKE? BECAUSE I HAVE THE DECLARATIONS NOW, A VERY THOROUGH
18 ONE FROM PROFESSOR CORNELL.

19 **MS. BOUTIN:** SURE. YOUR HONOR, I WOULD IMAGINE THAT
20 IT WOULD LOOK LIKE A MORE IN-DEPTH REPORT FROM PROFESSOR
21 CORNELL. HE CERTAINLY IS IN-DEPTH IN TERMS OF PROVIDING
22 BACKGROUND AS TO SPECIFIC LAWS, HE SIMPLY DIDN'T HAVE ENOUGH
23 TIME TO DO AS THOROUGH RESEARCH AS HE WOULD HAVE LIKED FOR US
24 TO GATHER ALL OF THE LAWS. WE WOULD BE HAPPY TO FILE A
25 COMPENDIUM.

1 AND, IN ADDITION, IN MANY OF THESE CASES A LOT OF
2 TIMES THERE IS MORE THAN ONE EXPERT INVOLVED IN THESE MATTERS
3 AND THERE IS MORE THAN ONE -- THERE IS MORE THAN ONE HISTORIAN
4 THAT OPINES ON THESE MATTERS. YOU KNOW, I THINK, IN OTHER
5 CASES BEFORE DISTRICT COURTS RIGHT NOW, THERE MIGHT BE FIVE OR
6 SIX EXPERTS. SO THESE ARE NOT SIMPLE ISSUES.

7 IF YOU LOOK AT THE BRUEN DECISION ITSELF, THE AMOUNT
8 OF THE DECISION THAT IS TAKEN UP BY AN INCREDIBLY IN-DEPTH AND
9 COMPLEX HISTORICAL ANALYSIS IS PRETTY IMPRESSIVE.

10 AND I THINK -- YOU KNOW, THERE IS ALSO A DIFFERENCE,
11 I THINK, BETWEEN -- I MEAN, ESSENTIALLY HERE THE MOTION WAS
12 FILED A LITTLE BEFORE THE HOLIDAYS. SO THERE IS THAT AMOUNT
13 OF TIME. AND THEN OUR -- THEN OUR OPPOSITION WAS DUE JUST A
14 COUPLE OF WEEKS AGO. SO THERE WAS REALLY A LITTLE OVER A
15 MONTH. AND SO YOU DO WHAT YOU CAN IN A MONTH BUT YOU DON'T
16 CREATE A PLAN FOR WHAT THE FULL SCALE WOULD LOOK LIKE.

17 SO IT IS NOT -- YOU KNOW, EVEN IF WE WERE TO GET,
18 YOU KNOW, ANOTHER TWO MONTHS, THAT WOULDN'T BE THE SAME AS
19 HAVING THREE MONTHS OUT OF THE GATE. SO IT IS JUST A MATTER
20 OF AS -- AS JUDGE WU SAID IN HIS OPINION IN DEFENSE
21 DISTRIBUTED, YOU KNOW, IT IS NOT -- I MEAN, THAT IS NOT REALLY
22 POSSIBLE FOR THE STATE TO DO IN 30 DAYS, MUCH LESS, I THINK HE
23 SAID, 56 DAYS, GIVEN THE COMPLEXITY OF WHAT IS REALLY INVOLVED
24 IN THE ANALYSIS.

25 **THE COURT:** THE SEARCH REALLY WOULD BE FOR ANALOGOUS

1 REGULATIONS, AND MAKING THE ARGUMENT THAT THE REGULATIONS YOU
2 FIND ARE HISTORICALLY CONSISTENT WITH THE UHA.

3 **MS. BOUTIN:** THAT'S RIGHT, YOUR HONOR.

4 **THE COURT:** HASN'T THERE BEEN, WITH ALL OF THESE
5 PENDING CASES, I KNOW OTHER JUDGES HAVE ORDERED ALL OF THE
6 LAWS.

7 **MS. BOUTIN:** THAT WOULD DEFINITELY HELP, YOUR HONOR.
8 BUT I DO THINK WHEN YOU ARE TALKING ABOUT ANALOGOUS LAWS YOU
9 HAVE TO LOOK AT WHAT TYPE OF LAW ARE YOU TRYING TO ANALOGIZE
10 TO. SO THERE ISN'T -- AREN'T NECESSARILY THE SAME ANALOGOUS
11 LAWS OUT THERE.

12 IF WE ARE TALKING ABOUT IN THIS CASE, WHERE WE ARE
13 TALKING ABOUT PREVENTING ACCIDENTS DUE TO FIREARM COMPONENTS
14 AND HOW THEY ARE STORED, AS OPPOSED TO A CASE WHERE YOU ARE
15 TALKING ABOUT, YOU KNOW, ASSAULT WEAPONS AND WHERE YOU CAN BAN
16 DANGEROUS UNUSUAL WEAPONS, AND WHAT THE HISTORY OF THOSE LAWS
17 IS.

18 SO IT IS CERTAINLY -- THERE IS CERTAINLY -- AND I
19 KNOW DR. CORNELL WOULD SPEAK TO THIS. THERE IS CERTAINLY A
20 LOT MORE RESEARCH TO BE DONE. ALTHOUGH HE IS CONTINUING RIGHT
21 NOW, YOU KNOW, HE ALREADY -- HE HAS COMPILED A MUCH LENGTHIER
22 LIST OF GUNPOWDER LAWS.

23 AND I DON'T WANT TO GET TOO MUCH -- INTO TOO MUCH
24 DETAIL RIGHT HERE, BUT THIS ALSO -- THIS DOES BRING ME ALSO TO
25 A POINT THAT I HOPE YOUR HONOR IS AWARE OF, THE BONTA CASE

1 HAPPENING RIGHT NOW IN THE CENTRAL DISTRICT. THAT ALSO IS
2 CHALLENGING PROVISIONS OF THE UNSAFE HANDGUN ACT. AND THERE
3 IS ALSO A MOTION FOR PRELIMINARY INJUNCTION PENDING IN THAT
4 CASE RIGHT NOW. I WANTED TO MAKE SURE THAT WAS ON YOUR RADAR.

5 **THE COURT:** I WASN'T AWARE OF THAT CASE. WHAT'S THE
6 CHALLENGE THERE?

7 **MS. BOUTIN:** IT IS TO -- THE CASE IS A LITTLE BIT
8 SIMILAR TO THIS ONE IN THAT IN THEIR PAPERS THEY APPEAR TO
9 CHALLENGE A WIDE SWATH OF PROVISIONS. IN THEIR -- AT THEIR
10 PRELIMINARY INJUNCTION HEARING I BELIEVE THEY NARROWED IT DOWN
11 TO CHALLENGING THE CHAMBER LOAD INDICATOR, MAGAZINE DISCONNECT
12 MECHANISM, AND MICROSTAMPING REQUIREMENTS IN THAT CASE.

13 **THE COURT:** HOW COME THEY ARE BEING HEARD IN TWO
14 DIFFERENT DISTRICTS?

15 **MS. BOUTIN:** THIS CASE WAS FILED FIRST, AND THEN THE
16 OTHER PLAINTIFF, IT IS A SEPARATE GROUP OF PLAINTIFFS. SO NO
17 OVERLAP ON THAT SIDE WITH THE PARTIES, I UNDERSTAND. SO THAT
18 IS HOW.

19 **THE COURT:** IS THERE POTENTIAL FOR INCONSISTENT
20 RULINGS? WHAT DO YOU KNOW ABOUT THAT OTHER CASE?

21 **MR. BENBROOK:** THERE ARE OVERLAPPING CLAIMS.
22 I AM NOT INVOLVED IN THAT. MY FIRM IS NOT INVOLVED.
23 THERE ARE NO OVERLAPPING PLAINTIFFS, I AM CONFIDENT
24 OF THAT.

25 AND SO, YES, WE WERE FILED BEFORE AND WE ARE

1 PRESSING AHEAD.

2 **THE COURT:** IS THERE THE IDEA OF A MOTION TO
3 TRANSFER OR STAY, OR DO YOU KNOW?

4 **MR. BENBROOK:** THERE HASN'T BEEN ONE FILED.

5 **THE COURT:** ALL RIGHT.

6 AND THAT CASE IS PENDING BEFORE JUDGE WU?

7 **MS. BOUTIN:** NO. THAT CASE IS PENDING BEFORE JUDGE
8 CARNEY, I BELIEVE.

9 **THE COURT:** OKAY.

10 **MR. BENBROOK:** AND IF I JUST -- I BELIEVE THERE IS
11 STILL FURTHER BRIEFING TO BE DONE IN THAT CASE.

12 **THE COURT:** YES.

13 **MR. BENBROOK:** THEY ARE BEHIND US IN TERMS OF THE
14 SCHEDULING.

15 **THE COURT:** SO ANOTHER -- JUST SPEAKING
16 HYPOTHETICALLY. IF THE COURT WERE TO GRANT PRELIMINARY
17 INJUNCTION, IT COULD SET A HEARING FOR A PERMANENT INJUNCTION
18 AND ADDITIONAL RESEARCH, EXPERT TESTIMONY COULD BE GATHERED
19 BETWEEN NOW AND THEN.

20 **MS. BOUTIN:** THAT'S RIGHT, YOUR HONOR.

21 **THE COURT:** OKAY.

22 **MR. BENBROOK:** YOUR HONOR, MAY I TALK A LITTLE BIT
23 ABOUT THE MILLER CASE?

24 **THE COURT:** YES.

25 **MR. BENBROOK:** IT IS WORTH EMPHASIZING. I DON'T

1 THINK IT IS FAIR TO SAY THAT IS AN ENTIRELY SEPARATE EXERCISE.

2 THE STATE CATALOGED, ON JANUARY 11, A MASSIVE
3 COMPILATION OF LAWS THAT THEY CONTEND ARE POTENTIALLY RELEVANT
4 TO THE ASSAULT WEAPONS BAN. 95 PAGES OF SMALL PRINT
5 IDENTIFYING 316 LAWS.

6 I WOULD RESPECTFULLY SUBMIT, IF THERE WAS A LAW
7 THAT -- OUT THERE THAT THE STATE THOUGHT COULD SUPPORT THEIR
8 THEORY HERE, IN ADDITION TO WHAT THEY HAVE ALREADY IDENTIFIED,
9 IT WOULD HAVE BEEN ON THAT LIST AND WOULD HAVE BEEN -- WOULD
10 HAVE BEEN CITED HERE.

11 I MEAN, THE STATE HAS BEEN DIGGING INTO HISTORY IN
12 MULTIPLE CASES SINCE THE DAY AFTER BRUEN WAS DECIDED. AND
13 WHAT COUNSEL -- AND COUNSEL AFFIRMS THAT. IN ALL OF THESE
14 CASES THE HISTORY IS BEING DUG UP, AND I THINK THAT CUTS
15 AGAINST THE STATE HERE.

16 **THE COURT:** ALL RIGHT.

17 DIFFERENT QUESTION HERE.

18 I WENT ON THE WEBSITE, THE ATTORNEY GENERAL'S
19 WEBSITE, YESTERDAY AND FOUND IT SAYS RECENTLY ADDED HANDGUN
20 MODELS TO THE ROSTER. AND THERE ARE TWO OF THEM?

21 **MS. BOUTIN:** I HAVE NOT LOOKED RECENTLY, BUT I WOULD
22 ASSUME THOSE ARE MOST LIKELY EITHER -- THOSE ARE MOST LIKELY
23 EITHER NOT SEMIAUTOMATIC PISTOLS, SO EITHER REVOLVERS OR
24 SINGLE-SHOT PISTOLS, OR THEY ARE WHAT THEY CALL SIMILARS,
25 WHICH IS WHERE THERE IS ONLY A COSMETIC DIFFERENCE.

1 **THE COURT:** THEY APPEAR TO BE SEMIAUTOMATIC. ONE IS
2 A FRANKLIN ARMORY 9MMX19 PISTOL, 3.9-INCH BARREL. THE MODEL
3 IS CA320. AND THEN THERE IS A P320 9MM PISTOL, 3.9-INCH
4 BARREL.

5 MOST OF THESE 9 MILLIMETERS ARE SEMIAUTOS.

6 THE FIRST ONE, FRANKLIN, IT SAYS DATE ADDED FEBRUARY
7 3 OF THIS YEAR. THE OTHER ONE IS MANUFACTURER SECOND
8 AMENDMENT, P320, ADDED JANUARY 18 THIS YEAR.

9 SO JUST LOOKING AT THIS, DOES THAT MEAN THAT THERE
10 ARE TWO MODELS THAT MANUFACTURERS HAVE COMPLIED WITH THE THREE
11 FEATURES?

12 **MS. BOUTIN:** NOT NECESSARILY, YOUR HONOR.

13 MODELS CAN ALSO BE ADDED TO THE ROSTER IF THEY ARE
14 WHAT IS CALLED A, QUOTE, SIMILAR; WHICH MEANS ITS DIFFERENCES
15 WITH A MODEL ALREADY ON THE ROSTER ARE -- ARE MERELY COSMETIC.

16 **THE COURT:** THAT IS PROBABLY THE CASE.

17 **MS. BOUTIN:** YES.

18 **MR. BENBROOK:** YES. AND THE EVIDENCE, I BELIEVE,
19 ESTABLISHES HERE THERE IS NO GUN ON THE MARKET THAT HAS ALL
20 THREE OF THOSE FEATURES.

21 **THE COURT:** RIGHT.

22 SO WITH THESE TWO NEW GUNS BEING ADDED, THAT MEANS
23 DOJ WILL DROP SIX OFF. NO?

24 **MS. BOUTIN:** NO, YOUR HONOR.

25 THE ONLY TIME THEY DROP OFF MODELS IS WHEN THERE IS

1 A SEMIAUTOMATIC PISTOL ADDED THAT DOES HAVE ALL THREE.

2 **THE COURT:** THAT'S RIGHT. OKAY. THANK YOU.

3 SO I THINK WHEN I LOOKED AT THIS I -- YOU HAVE
4 ANSWERED MY QUESTIONS. IT IS PROBABLY NOT WHAT IT APPEARED TO
5 BE.

6 IT IS NOT DISPUTED THAT THERE ARE NO NEW MODELS OF
7 GUNS THAT HAVE BEEN ADDED TO THE ROSTER SINCE 2013. IS THAT
8 RIGHT?

9 **MS. BOUTIN:** THERE HAVE BEEN MODELS OF HANDGUNS -- I
10 GUESS -- IS YOUR QUESTION IT IS NOT DISPUTED THERE HAVE BEEN
11 NO MODELS ADDED THAT HAVE THE THREE SAFETY FEATURES WE HAVE
12 BEEN TALKING ABOUT?

13 **THE COURT:** YES.

14 **MS. BOUTIN:** YES, I BELIEVE THAT IS CORRECT.

15 YOUR HONOR, MAY I POINT OUT SOMETHING --

16 **THE COURT:** YES.

17 **MS. BOUTIN:** -- THAT I THINK IS IMPORTANT THAT IS
18 RELATED TO THAT, THOUGH?

19 **THE COURT:** YES.

20 **MS. BOUTIN:** WE POINTED OUT IN OUR BRIEF THAT IT IS
21 IMPORTANT TO LOOK AT THE VARIOUS PROVISIONS OF THE UHA
22 SEPARATELY. WE CAN CALL THEM THE UHA, BUT IT HAS BEEN A
23 SERIES OF ENACTMENTS. WE ARE NOT TALKING ABOUT ONE ENACTMENT,
24 SO IT IS NOT EVEN TECHNICALLY ABOUT SEVERABILITY AMIDST ONE
25 ENACTMENT.

1 AND I THINK IT IS IMPORTANT TO NOTE, I THINK EVEN
2 ONE OF THE PLAINTIFFS' DECLARATIONS TALKED ABOUT HE BELIEVES
3 AT ONE POINT THE ROSTER HAD AROUND 1300 MODELS ON IT.

4 AND, I APOLOGIZE, I WOULD BE WILLING TO -- I WOULD
5 BE HAPPY TO SUBMIT A SUPPLEMENTAL DECLARATION. BUT OUR
6 WITNESS, THE SPECIAL AGENT SUPERVISOR SAL GONZALEZ OF THE
7 BUREAU OF FIREARMS, TOOK A LOOK. AND I THINK IT IS IMPORTANT
8 TO NOTE THAT --

9 BACKING UP ONE MOMENT.

10 OVER TIME, VARIOUS PROVISIONS WERE ADDED TO THE ACT.
11 THE CLI AND MDM REQUIREMENTS WENT INTO PLACE IN 2006, 2007.
12 THE MICROSTAMPING REQUIREMENT BECAME EFFECTIVE IN 2010.

13 AND BETWEEN THAT TIME APPROXIMATELY -- THE NUMBER OF
14 MODELS ON THE ROSTER ROSE APPROXIMATELY FROM ABOUT 1,000 TO
15 1300.

16 SO WHEN WE ARE TALKING ABOUT LOOKING AT WHICH
17 PROVISION MIGHT BE CAUSING ANY NUMBER OF HANDGUNS TO GO DOWN
18 WHICH -- WE DON'T -- WE DON'T BELIEVE YOU HAVE TO GET TO THAT
19 STEP.

20 BUT IF, TO THE EXTENT THAT THAT MATTERS, THE NUMBERS
21 CONTINUED TO RISE EVEN ONCE THE CLI AND MDM REQUIREMENTS WENT
22 IN -- AND IT IS UNDISPUTED THAT THERE ARE SOME HANDGUNS WITH
23 THOSE FEATURES ON THERE.

24 SO I THINK WHEN WE LOOK AT EACH REQUIREMENT IT IS
25 IMPORTANT TO LOOK AT WHAT THE POSSIBLE -- WHAT HAS BEEN

1 ACTUALLY SHOWN BY THE PLAINTIFFS AS FAR AS CAUSATION GOES WITH
2 THE HANDGUN -- THE NUMBER OF HANDGUNS ON THE ROSTER.

3 **THE COURT:** IT IS NOT DISPUTED THAT SINCE 2013 THERE
4 WERE APPROXIMATELY 1300 HANDGUNS; NOW THERE ARE JUST OVER 800.
5 BUT YOU ARE SAYING THAT IS FOR A VARIETY OF REASONS.

6 **MS. BOUTIN:** RIGHT. BUT -- BUT -- AND MY POINT IS
7 JUST THAT PRIOR TO -- THAT -- THAT -- THAT DATE THAT YOU ARE
8 LOOKING AT SINCE IT HAS GONE DOWN IS WHEN MICROSTAMPING WENT
9 INTO PLACE. BEFORE THAT OTHER PROVISIONS OF THE UHA WERE IN
10 PLACE, AND THE ROSTER NUMBERS HAD CONTINUED TO GROW.

11 SO THAT IS WHY IT IS IMPORTANT TO LOOK AT, OKAY,
12 WHICH PROVISION ARE WE TALKING ABOUT COULD ACTUALLY BE CAUSING
13 THE NUMBER OF HANDGUNS ON THE ROSTER TO DECREASE.

14 WE CAN'T -- YOU KNOW, PRETTY MUCH ALL SEMIAUTOMATIC
15 PISTOLS HAVE, YOU KNOW, A SAFETY OR, YOU KNOW, THE ONES THAT,
16 YOU KNOW, MY UNDERSTANDING IS THEY GENERALLY PASS THE LAB
17 TESTING REQUIREMENTS BECAUSE, YOU KNOW, THEY ARE IMPORTANT
18 REQUIREMENTS.

19 YOU KNOW, THOSE -- THERE HAS BEEN NO SHOWING THAT
20 THOSE CAUSE ANY HANDGUNS NOT TO MAKE IT ONTO THE ROSTER. AND
21 BECAUSE IF YOU LOOK AT THE NUMBERS, THE CLI AND THE MDM
22 REQUIREMENTS ALSO FALL INTO THAT BUCKET OF THERE SIMPLY HAS
23 BEEN NO SHOWING THAT THOSE PROVISIONS HAVE CAUSED PLAINTIFFS
24 NOT TO BE ABLE TO KEEP AND BEAR ANY PARTICULAR HANDGUN MODEL.

25 **THE COURT:** THE STATE CHARACTERIZES THE CLI AND MDM

1 AS SAFETY FEATURES, AND THE MICROSTAMPING AS INVESTIGATIVE,
2 PROMOTING LAW ENFORCEMENT INVESTIGATION.

3 **MS. BOUTIN:** YES, I THINK THAT RIGHT -- THAT IS
4 RIGHT. I THINK THEY ALL FALL INTO, YOU KNOW, THE BROADER
5 CATEGORY OF PUBLIC SAFETY.

6 BUT WHEN WE ARE TALKING ABOUT WHAT MAKES A
7 PARTICULAR HANDGUN SAFER, THE CLI AND MDM FALL IN THAT
8 CATEGORY. AND MICROSTAMPING IS JUST A LITTLE BIT DIFFERENT
9 BECAUSE IT HAS TO DO WITH AIDING LAW ENFORCEMENT WHEN THERE
10 HAS BEEN A SHOOTING CRIME.

11 **THE COURT:** AND DO YOU DISPUTE THAT THE UHA, TAKING
12 ALL OF THE PROVISIONS, PROHIBITS THE SALE OF HUNDREDS OF
13 MODELS OF HANDGUNS THAT ARE IN COMMON USE IN THE UNITED
14 STATES?

15 **MS. BOUTIN:** FRANKLY, YOUR HONOR, THAT'S AN ISSUE
16 THAT, ONE, I DON'T THINK IS RELEVANT BECAUSE THE ISSUE OF
17 COMMON USE IS A LIMITATION ON THE RIGHT TO OWN WEAPONS. SO I
18 DO NOT THINK THAT IS RELEVANT.

19 BUT IF ONE WERE TO THINK THAT IS RELEVANT, I WOULD
20 SAY THAT THERE HAS BEEN NO PRIMA FACIE SHOWING OF COMMON USE
21 BY PLAINTIFFS. THEY HAVE THE BURDEN OF PERSUASION, THEY HAVE
22 THE BURDEN OF PRODUCTION ON THIS ISSUE IF IT WERE RELEVANT.

23 SO, YOU KNOW, ON ONE HAND PLAINTIFFS SAY THE MODEL
24 OF HANDGUN MATTERS BECAUSE THEY ARE SO DIFFERENT FROM ONE
25 ANOTHER THAT THERE IS A DIFFERENCE IN HOW -- HOW WELL THEY CAN

1 BE USED FOR SELF DEFENSE; BUT THEN, ON THE OTHER HAND, THEY
2 DON'T WANT TO HAVE TO MAKE THE SHOWING AS TO WHICH MODELS ARE
3 ACTUALLY IN COMMON USE. THEY ARE JUST TRYING TO SAY THAT
4 THERE -- THERE ARE LOTS OF ADDITIONAL MODELS THAT ARE IN
5 COMMON USE, AND JUST KIND OF MAKE THAT SUFFICIENT FOR THEIR
6 SHOWING.

7 SO, AGAIN, TO SUM UP, WE DON'T THINK THE COMMON USE
8 ISSUE IS RELEVANT HERE BECAUSE IT IS A LIMITATION ON THE
9 SECOND AMENDMENT RIGHT. IT IS NOT -- IT DOESN'T -- IT'S NOT
10 SUFFICIENT TO SATISFY THE RIGHT. BUT WE CERTAINLY DON'T THINK
11 THEY HAVE MET THEIR BURDEN ON THAT ISSUE ANYWAY.

12 **THE COURT:** WHAT ABOUT THE DECLARATION THAT WAS
13 PROVIDED. SO IN THAT THE DECLARANT STATES, FOR EXAMPLE, THAT
14 THERE ARE HUNDREDS OF MODELS THAT ARE IN COMMON USE THROUGHOUT
15 THE UNITED STATES THAT ARE PROHIBITED FROM SALE IN CALIFORNIA
16 UNDER THE UHA.

17 AND THEN SPECIFICALLY HE TALKS ABOUT THE GLOCK F43,
18 THE SIG 320, AND THE SPRINGFIELD HELLCAT, THAT THESE ARE IN
19 COMMON USE THROUGHOUT THE REST OF THE NATION. IS THAT
20 DISPUTED?

21 **MS. BOUTIN:** I THINK THE MORE GENERAL STATEMENT
22 ABOUT ALL -- WELL, THERE ARE SEVERAL PARTS TO THAT, SO PLEASE
23 LET ME KNOW IF I MISSED A PART.

24 I WILL SAY FOR THE -- FOR THE SPECIFIC HANDGUNS, I
25 WOULD SAY I DON'T THINK THAT REACHES THE LEVEL OF PRIMA FACIE

1 EVIDENCE. I THINK THAT IS A VERY CONCLUSORY STATEMENT THAT IS
2 NOT BACKED UP BY SALES OR ANY OTHER KIND OF NUMBERS BY
3 PLAINTIFF. AND I THINK IF YOU LOOK, I BELIEVE IN OUR RESPONSE
4 TO SEPARATE STATEMENT WE HAD CASE LAW CITATIONS OF WHAT
5 CONSTITUTES SUFFICIENT PRIMA FACIE EVIDENCE.

6 AND AS FAR AS THE MORE GENERAL STATEMENTS MADE, I
7 MEAN, I THINK WE HAVE -- THERE IS CERTAINLY -- THERE HAS JUST
8 CERTAINLY BEEN NO DISCOVERY. AND, AGAIN, NOTHING -- NO
9 REPRESENTATION ON NUMBERS OF WHAT CONSTITUTES COMMON USE.

10 ARE THERE A NUMBER OF HANDGUNS THAT ARE SOLD IN
11 OTHER STATES AND MAYBE -- MAYBE WIDELY USED? PROBABLY. BUT I
12 DON'T KNOW WHICH ONES AND I DON'T KNOW WHAT THE NUMBERS ARE.

13 AND, AGAIN, I ALSO THINK IT IS IMPORTANT IN THIS
14 CASE -- YOU KNOW, AGAIN, WE HAD ONLY A LITTLE OVER A MONTH TO
15 RESPOND, BUT THERE IS NO SCHEDULING ORDER IN THIS CASE. THERE
16 HAS BEEN NO NOTICE AS TO WHAT OUR DEADLINES ARE IN ORDER TO
17 CONDUCT THAT DISCOVERY.

18 SO, AGAIN, I DON'T THINK COMMON USE IS A RELEVANT
19 ISSUE IN THIS CASE. BUT IF THIS COURT WERE TO FIND THAT IT
20 WERE, WE CERTAINLY WOULD WANT TO PROBE AND UNDERSTAND WHAT
21 THEIR EVIDENCE OF COMMON USE IS.

22 **THE COURT:** AND IF COMMON USE IS RELEVANT, ISN'T
23 THAT SOMETHING THE COURT COULD PERHAPS EVEN JUDICIALLY NOTICE?
24 I MEAN, ANYONE CAN RESEARCH AND GO TO ARIZONA AND LOOK AT THE
25 SIG 320, LOOK AT HOW MANY HAVE BEEN SOLD. AND DETERMINING

1 WHETHER, GEE, THAT SOUNDS LIKE A LOT, IS --

2 **MS. BOUTIN:** YEAH. I THINK, YOUR HONOR, I THINK --
3 I THINK WHAT WOULD -- IF THIS WERE -- IF THIS WERE RELEVANT WE
4 WILL TAKE THAT AS AN UMBRELLA -- UMBRELLA PREFACE TO THESE
5 STATEMENTS.

6 IF THEY WERE RELEVANT I THINK THE PROPER WAY TO
7 HANDLE IT WOULD BE FOR PLAINTIFFS TO SUBMIT THE RAW DATA AS
8 FAR AS SALES GO, AND ANY OTHER -- YOU KNOW, POTENTIALLY THERE
9 MIGHT BE OTHER METRICS THAT ARE RELEVANT AS WELL, FOR THEM TO
10 PRESENT THE DATA.

11 PERHAPS THAT CAN BE STIPPED. THE DATA ITSELF, YOU
12 KNOW, WE MAY NOT CHALLENGE.

13 AND THEN, OF COURSE, THERE IS THE ISSUE OF WHAT
14 CONSTITUTES COMMON USE BECAUSE, YOU KNOW, A RAW NUMBER OF
15 SALES, HOW DOES THAT COMPARE TO TOTAL NUMBER OF SALES. IS
16 THERE DATA ABOUT HOW MANY -- WHAT GUNS ARE ACTUALLY USED AS
17 OPPOSED TO JUST PURCHASED.

18 YOU KNOW, IT IS NOT NECESSARILY A MATTER OF ONE
19 FIGURE, YOU KNOW, THIS MODEL SOLD 1,000 UNITS LAST YEAR. OH,
20 WELL, THAT SOUNDS LIKE -- THAT SOUNDS LIKE A LOT OF SALES,
21 THEREFORE THEY MUST BE IN COMMON USE.

22 I MEAN, OBVIOUSLY IT IS JUST MUCH MORE COMPLICATED
23 THAN THAT.

24 SO I THINK AS FAR AS THE -- YOU KNOW, CERTAIN RAW
25 DATA IS CONCERNED, I DON'T THINK THAT NECESSARILY HAS TO BE

1 DISPUTED. BUT I THINK, ONE, THERE HASN'T BEEN ANY PRESENTED
2 AT THIS STAGE. AND, TWO, I CAN'T -- YOU KNOW, I CAN'T SAY
3 THAT IF THEY PRESENTED RAW DATA WE WOULD NECESSARILY BE ABLE
4 TO SAY, OKAY, YES, THAT SHOWS COMMON USE.

5 **THE COURT:** YOUR VIEW IS THE DECLARATION SUBMITTED
6 IS NOT SUFFICIENT.

7 **MS. BOUTIN:** THAT'S RIGHT, YOUR HONOR.

8 **THE COURT:** WHY NOT?

9 **MS. BOUTIN:** WELL, I THINK IF YOU LOOK AT THE
10 STANDARD FOR WHAT IS PRIMA FACIE EVIDENCE, I THINK IT IS --
11 AND AGAIN, YOUR HONOR, IF YOU WERE TO FIND THAT IT WAS
12 SUFFICIENT PRIMA FACIE EVIDENCE WE WOULD SIMPLY JUST ASK FOR
13 MORE TIME IF THIS WERE FOUND TO BE RELEVANT. BUT --

14 PARDON ME, YOUR HONOR. THERE ARE A LOT OF DOCUMENTS
15 IN THIS CASE.

16 **THE COURT:** YES.

17 **MS. BOUTIN:** SO IT IS IN OUR RESPONSE TO OUR
18 SEPARATE STATEMENT WE CITED CASES SAYING WHEN THE MOVING PARTY
19 HAS THE BURDEN OF PROOF ON AN ISSUE, E.G., WHEN A PLAINTIFF
20 SEEKS SUMMARY JUDGMENT ON A CLAIM FOR RELIEF, THE MOVING
21 PARTY'S SHOWING MUST BE SUFFICIENT FOR THE COURT TO HOLD THAT
22 NO REASONABLE FACT FINDER COULD FIND OTHER THAN FOR THE MOVING
23 PARTY.

24 AND I THINK HERE A REASONABLE FACT FINDER CERTAINLY
25 COULD. THEY COULD SEE A DECLARATION THAT SAYS, WITH RESPECT

1 TO THAT -- I THINK THE ONE OR TWO GUNS THAT WERE SPECIFICALLY
2 ADDRESSED, HE JUST SAID THEY WERE TOP SELLING AND IN COMMON
3 USE. I DON'T THINK IT WOULD BE UNREASONABLE TO FIND THAT THAT
4 IS NOT SUFFICIENT EVIDENCE TO FIND COMMON USE.

5 AND THEN THE OTHER DECLARATION AS TO ALL OTHER
6 MODELS DOESN'T DISTINGUISH ONE MODEL FROM ANOTHER. THERE
7 COULD BE A HANDGUN -- A PARTICULAR HANDGUN MODEL THAT WAS SOLD
8 THAT WAS -- THERE WAS ONE MADE. THAT IS NOT NECESSARILY
9 COMMON USE. SO THERE IS -- THAT -- WHY SHOULD THAT WEAPON,
10 MAYBE IT IS A PARTICULARLY DANGEROUS WEAPON, IT DOES -- HAS NO
11 SAFETY FEATURES, WHY SHOULD THAT BE PERMITTED. YOU KNOW, THAT
12 WOULD -- THAT WOULD MAKE IT DANGEROUS AND UNUSUAL, PERHAPS.

13 SO -- SO, YOU KNOW, FOR THOSE REASONS I DON'T THINK
14 THEY MADE AN ADEQUATE SHOWING.

15 **THE COURT:** THE STATE RELIES FAIRLY HEAVILY ON PENA,
16 AS DID THIS COURT IN ITS ORDER DENYING THE MOTION TO DISMISS.

17 DO YOU CONTEND THAT PENA IS STILL VALID, IN ANY WAY,
18 FOLLOWING BRUEN?

19 **MS. BOUTIN:** YOUR HONOR, IN CERTAIN WAYS I THINK IT
20 IS -- STATEMENTS REGARDING THE ESTABLISHED EFFECTIVENESS AND
21 IMPORTANCE OF THE SAFETY FEATURES IS ACTUALLY RELEVANT, NOT TO
22 ANY KIND OF MERITS BALANCING AS FAR AS LIKELIHOOD TO SUCCEED,
23 BUT CERTAINLY AS TO THE OTHER WINTER FACTORS FOR AN
24 INJUNCTION; SO PUBLIC INTEREST AND BALANCE OF THE EQUITIES. I
25 THINK CERTAINLY RELEVANT FOR THAT.

1 I THINK THERE ARE PROBABLY OTHER ONES.

2 YOU KNOW, WE WERE -- WE TRIED TO BE CAREFUL WITH OUR
3 BRIEFING. WE TRIED NOT TO LOOK AT, YOU KNOW, THE SECTION
4 OF -- OF THE PENA DECISION THAT DID GO TO THAT INTERMEDIATE
5 SCRUTINY BALANCING. WE TRIED NOT TO CITE IT FOR THE PURPOSE
6 OF BALANCING, OF MERITS BALANCING, I SHOULD SAY.

7 SO I THINK WHERE WE CITED IT IN THE BRIEF IS WHERE
8 WE BELIEVED IT WAS RELEVANT.

9 **THE COURT:** ALL RIGHT.

10 IF WE COULD GO TO BRUEN, AND INITIALLY THE FIRST
11 PRONG, THE TEXTUAL ARGUMENT.

12 BOTH PARTIES CITE BRUEN AND HELLER. THE PLAINTIFFS
13 ARGUE THAT BRUEN STATES THAT HELLER STATES, QUOTE -- WELL,
14 THAT HELLER, QUOTE, FOUND IT FAIRLY SUPPORTED BY THE
15 HISTORICAL TRADITION OF PROHIBITING THE CARRYING OF DANGEROUS
16 AND UNUSUAL WEAPONS. THAT THE SECOND AMENDMENT PROTECTS THE
17 POSSESSION AND USE OF WEAPONS THAT ARE IN COMMON USE AT THE
18 TIME.

19 SO ISN'T BRUEN SAYING IF A WEAPON, AN ARM, IS IN
20 COMMON USE AT THE TIME, TODAY, THAT THE SECOND AMENDMENT
21 PROTECTS IT?

22 **MS. BOUTIN:** I THINK YOU HAVE TO LOOK -- I THINK
23 THERE -- YOU HAVE TO LOOK AT THAT STATEMENT FROM HELLER IN
24 EVERY CONTEXT IN WHICH IT COMES UP: IN HELLER, IN THE
25 MCDONALD CASE, WHICH IS INTERVENING, AND IN BRUEN.

1 THE PASSAGE CITED BY PLAINTIFFS WAS THE ONLY TIME
2 WHERE IT LOOKS MAYBE ARGUABLY MAYBE A LITTLE BIT AMBIGUOUS.
3 EVERY OTHER INSTANCE -- AND WE CITED -- WE ATTEMPTED TO CITE
4 THEM ALL IN OUR BRIEF.

5 EVERY OTHER INSTANCE, IF YOU GO TO THAT PAGE AND YOU
6 LOOK AT THE PARAGRAPH IT IS IN, IT IS VERY CLEAR THAT THE
7 ISSUE COMES UP IN THE CONTEXT OF, WHAT ARE THE CATEGORIES THAT
8 THE SECOND AMENDMENT DOES NOT COVER. SO THE DANGEROUS AND
9 UNUSUAL WEAPONS, COMMERCIAL SALE OF FIREARMS.

10 IN HELLER IT LISTS OUT THOSE CATEGORIES AND IT SAYS
11 ANOTHER LIMITATION TO THE SECOND AMENDMENT IS. AND THEN IT
12 SAYS WEAPONS THAT ARE NOT IN COMMON USE.

13 AND IT SAYS THIS IS FAIRLY SUPPORTED BY THE
14 DANGEROUS AND UNUSUAL WEAPONS.

15 AND EVERY OTHER -- EVERY OTHER INSTANCE IN WHICH
16 THAT QUOTATION COMES UP, OTHER THAN THE ONES CITED BY
17 PLAINTIFFS, IT IS CLEAR THAT THAT IS MEANT TO BE A LIMITATION.

18 THERE IS ANOTHER INSTANCE IN THE MAJOR -- I SHOULD
19 SAY THE PLURALITY -- I BELIEVE IT IS THE PLURALITY OF THE
20 BRUEN OPINION IN WHICH THAT IS MORE CLEAR. AND ALSO IN THE
21 CONCURRENCE BY JUSTICE KAVANAUGH, HE ALSO REITERATES THE
22 LARGER STATEMENT FROM HELLER MAKING CLEAR THAT THESE ARE THE
23 CATEGORIES -- THESE -- THIS IS A NONEXHAUSTIVE LIST OF
24 CATEGORIES THAT IS NOT AFFECTED BY BRUEN AS FAR AS CHANGING
25 THE FACT THAT THESE ARE OUTSIDE THE SCOPE OF THE SECOND

1 AMENDMENT.

2 AND IT LISTS THOSE CATEGORIES AND IT SAYS,
3 ANOTHER -- ANOTHER LIMITATION TO THE SECOND AMENDMENT'S
4 PROTECTION IS WEAPONS THAT ARE NOT IN COMMON USE.

5 SO, AGAIN, IF YOU LOOK AT WHAT IS BEING QUOTED, IF
6 YOU LOOK AT EVERY ONE BUT ARGUABLY ONE CITATION TO IT, IT IS
7 CLEAR THAT THAT COMMON USE IS MEANT TO BE NECESSARY FOR A
8 WEAPON, OR FOR KEEPING AND BEARING A PARTICULAR WEAPON, FOR
9 THAT TO BE PROTECTED. BUT IT IS CERTAINLY NOT SUFFICIENT. IT
10 IS NOT THAT ANY WEAPON IN COMMON USE IS PROTECTED.

11 **THE COURT:** ALL RIGHT. SO MORE WITH BRUEN.

12 BRUEN ALSO SAYS -- WELL, FIRST, THE CONDUCT AT ISSUE
13 HERE IS THAT PLAINTIFFS WISH TO ENGAGE IN KEEPING AND BEARING
14 ARMS NOT LISTED ON THE ROSTER FOR SELF-DEFENSE. AND THEY CITE
15 BRUEN. AND THE ARGUMENT IS THAT ARMS, AT ISSUE, ARE COVERED
16 AS THE SECOND AMENDMENT, QUOTE, EXTENDS TO ALL INSTRUMENTS
17 THAT CONSTITUTE BEARABLE ARMS, END QUOTE.

18 THAT IS BRUEN.

19 AND THEN THEY ARGUE THAT ARMS, ACCORDING TO BRUEN,
20 QUOTE, COVERS MODERN INSTRUMENTS THAT FACILITATE ARMED
21 SELF-DEFENSE. CITING BRUEN AT PAGE 2132.

22 AND THE ARGUMENT IS, THE TEXTUAL ARGUMENT, THAT
23 SINCE THESE ARE BEARABLE ARMS, AND THEY ARE CERTAINLY MODERN
24 INSTRUMENTS THAT FACILITATE SELF-DEFENSE, THAT THEY FALL
25 WITHIN THE PLAIN TEXT OF THE SECOND AMENDMENT. AND THEN WE

1 ARE INTO PRONG TWO.

2 HOW DO YOU RESPOND TO THAT? DOESN'T BRUEN REALLY
3 MAKE THE STATE'S POSITION HERE VERY DIFFICULT, GIVEN THE
4 LANGUAGE WITHIN BRUEN ITSELF, THAT THIS UHA DOESN'T FALL
5 WITHIN THE PLAIN TEXT OF THE SECOND AMENDMENT OR IS NOT
6 COVERED BY THE SECOND AMENDMENT?

7 **MS. BOUTIN:** NOT AT ALL, YOUR HONOR. OUR POSITION
8 IS THAT THESE PROVISIONS DO NOT KEEP PLAINTIFFS FROM KEEPING
9 AND BEARING HANDGUNS. THERE ARE A MULTITUDE OF HANDGUNS, AND
10 WE ARE TALKING ABOUT MINOR DIFFERENT -- VERY MINOR DIFFERENT
11 VERSIONS OF THEM. IN THE BOLAND CASE MR. GONZALEZ TALKED
12 ABOUT THIS BEING LIKE THE DIFFERENCE BETWEEN AN IPHONE 13 AND
13 AN IPHONE 14.

14 YOU KNOW, ANOTHER WAY -- ANOTHER IMPORTANT ASPECT OF
15 HOW TO LOOK AT THIS IS THE UHA ALSO ISN'T BANNING ANY
16 PARTICULAR MODEL, PER SE. FOR THESE PARTICULAR MODELS IF
17 THE -- IF THE MANUFACTURER WERE TO ADD THE FEATURES THAT WERE
18 REQUIRED, AGAIN, THEY WOULD NOT BE BANNED.

19 I THINK THE SCOPE OF THE ALTERNATIVE APPROACH TO SAY
20 THAT ANY TIME -- ANY TIME THERE IS ANY REQUIREMENT AS TO THE
21 ARM WHATSOEVER THAT'S UNCONSTITUTIONAL, I MEAN, I THINK THAT
22 GETS INTO A LITTLE BIT OF BROAD TERRITORY. THEY ARE
23 CHALLENGING THE REQUIREMENT FOR HANDGUNS THAT THEY HAVE A
24 SAFETY. SO, YOU KNOW, THAT RAISES THE QUESTION, IN THEORY,
25 IS, YOU KNOW, WOULD THAT NOT BE VIABLE.

1 HERE I DON'T THINK THAT IS AS MUCH OF AN ISSUE
2 BECAUSE, AGAIN, THEY HAVE NOT PROVIDED ANY EVIDENCE WHATSOEVER
3 THAT A SAFETY THAT THE LAB TESTING -- AND THAT THE CLI AND MDM
4 REQUIREMENTS ACTUALLY DO PREVENT THEM FROM HAVING ANY
5 PARTICULAR MODEL OF HANDGUN. SO I DON'T THINK CERTAINLY --
6 FRANKLY, THERE HAS BEEN NO SHOWING FOR ANYTHING EXCEPT
7 MICROSTAMPING.

8 SO I DO THINK IT IS IMPORTANT, ONCE AGAIN, TO CIRCLE
9 BACK, THAT EVEN IF YOU WERE TO ACCEPT THE INTERPRETATION THAT
10 YOU SET FORWARD A MOMENT AGO, THAT STILL WOULDN'T APPLY TO,
11 YOU KNOW, 90 PERCENT OF THE -- MORE THAN THAT OF THE
12 PROVISIONS THAT THEY ARE CHALLENGING. BECAUSE, AGAIN, THEY
13 HAVEN'T SHOWN THAT THE PROVISION, WHETHER IT IS A REQUIREMENT
14 FOR SAFETY, WHETHER IT IS A REQUIREMENT FOR DROP SAFETY
15 TESTING IN A LAB, HAS PREVENTED THEM FROM KEEPING OR BEARING
16 ANY MODEL OF HANDGUN.

17 **THE COURT:** ISN'T THAT A CHOICE ARGUMENT, THOUGH.
18 SO THAT IF THE PLAINTIFFS HAVE A CHOICE, YOU ARE SAYING IF THE
19 UHA ELIMINATES A CHOICE OF A CERTAIN KIND OF HANDGUN THAT
20 DOESN'T FALL WITHIN THE PLAIN TEXT OF THE SECOND AMENDMENT
21 BECAUSE THEY CAN STILL BUY THESE 800 ON THE ROSTER.

22 **MS. BOUTIN:** YES, I THINK THAT IS PROBABLY ACCURATE
23 TO SAY. ALTHOUGH IT IS ALSO WORTH EMPHASIZING THERE ARE
24 NUMEROUS EXCEPTIONS, INCLUDING BUYING IN A PRIVATE -- IN A
25 PRIVATE --

1 **THE COURT:** PRIVATE SALE.

2 **MS. BOUTIN:** -- TRANSACTION.

3 SO IF IT IS YOUR PREFERENCE YOU CAN STILL OBTAIN IT.
4 IT IS -- LIKE I SAID, IT IS NOT -- IT IS NOT A BAN.

5 **THE COURT:** IT IS BANNING THE SALE, THOUGH, OF GUNS,
6 EFFECTIVELY SINCE 2013. SO THESE NEWER MODEL GUNS HAVE BEEN
7 BANNED BY THE UHA. AND WHAT'S ON THE ROSTER ARE PRE-2013
8 GUNS, FOR THE MOST PART.

9 **MS. BOUTIN:** I THINK THERE IS -- THERE IS -- I THINK
10 WHAT YOU ARE TALKING ABOUT IN EFFECT THAT HAPPENING, I DON'T
11 COMPLETELY DISPUTE THAT. BUT I DO THINK IT IS IMPORTANT TO
12 NOTE THAT THERE IS -- THERE IS -- THERE IS KIND OF A MISSING
13 STEP OF CAUSATION THERE. WE DON'T KNOW WHY THE MANUFACTURERS
14 AREN'T MAKING -- AREN'T ADDING THESE DEVICES TO THEIR
15 FIREARMS.

16 AND, AGAIN, WE ALSO DON'T KNOW IF THE MICROSTAMPING
17 REQUIREMENT WEREN'T IN PLACE IT -- MAYBE THEY WOULD ALL ADD
18 THESE OTHER REQUIREMENTS TO THE -- SORRY.

19 MAYBE THEY WOULD ADD CLI'S, MDM'S TO ALL OF THE
20 OTHER HANDGUNS BECAUSE THEN THEY COULD GET THEM ALL IN
21 CALIFORNIA BECAUSE THEY HAVE BEEN CLAIMING THAT IT IS NOT
22 POSSIBLE TO DO MICROSTAMPING.

23 SO MAYBE IT IS ONLY MICRO -- I MEAN, AGAIN, THIS IS
24 HYPOTHETICAL. BUT THIS IS JUST TO POINT OUT THE CAUSATION
25 PROBLEM WE HAVE HERE BECAUSE THERE IS A MISSING STEP OF WHY

1 ARE MANUFACTURERS NOT ADDING THESE FEATURES, RIGHT.

2 SO IF WE SAW THAT THE ROSTER WAS GOING UP, UP, UP,
3 UNTIL MICROSTAMPING, YOU KNOW, I DON'T KNOW HOW WE SAY THAT
4 THE OTHER SAFETY MECHANISMS ARE WHAT IS CAUSING MANUFACTURERS
5 TO NOT INCLUDE THE SAFETY DEVICES ON THEIR HANDGUNS -- I
6 SHOULD SAY ON THEIR SEMIAUTOMATIC PISTOLS.

7 **THE COURT:** THE ARGUMENT THAT THE STATE MAKES,
8 THOUGH, ABOUT PLAINTIFFS STILL HAVE A RIGHT TO BUY CERTAIN
9 KINDS OF HANDGUNS, THIS CHOICE ARGUMENT, HOW IS THAT A TEXTUAL
10 ARGUMENT. BECAUSE BRUEN INSTRUCTS THAT THE FIRST OBLIGATION
11 OF THIS COURT IS TO DETERMINE WHETHER THE REGULATION AT ISSUE
12 IS COVERED BY THE SECOND AMENDMENT, AND CHOICE DOESN'T HAVE
13 ANYTHING TO DO WITH THAT.

14 **MS. BOUTIN:** WELL, THE PLAIN TEXT IS IS THAT, YOU
15 KNOW, THE STATE CANNOT INFRINGE KEEPING -- THE RIGHT TO KEEP
16 AND BEAR ARMS. AND WE DON'T INFRINGE THE RIGHT TO KEEP AND
17 BEAR HANDGUNS. THEY CAN -- AND THE -- AS THE SUPREME COURT
18 SAYS, THE HANDGUN IS THE QUINTESSENTIAL SELF-DEFENSE WEAPON.

19 AND I THINK ANOTHER THING THAT IS IMPORTANT IS THERE
20 HAS BEEN NO -- WHEN WE ARE TALKING ABOUT CHOICE, OKAY, LET'S
21 SAY, ONE, THE MODELS THAT ARE OFF THE ROSTER ARE, YOU KNOW,
22 TEN TIMES BETTER AT SELF-DEFENSE THAN THE ONES THAT ARE ON THE
23 ROSTER. LET'S SAY THAT WERE THE CASE. OKAY. MAYBE THAT
24 WOULD BE A CLOSER CALL.

25 BUT THERE HAS BEEN NO SHOWING OF ANY REAL MATERIAL

1 DIFFERENCE. AND THE CORE -- AS THE SUPREME COURT SAID, THE
2 CORE OF THE SECOND AMENDMENT RIGHT IS THE ABILITY TO DEFEND
3 YOURSELF, THE ABILITY TO DEFEND YOURSELF IN THE HOME AND TO
4 BEAR A GUN IN PUBLIC. AND IT DOES NOT KEEP PEOPLE FROM --
5 KEEP -- PREVENT PEOPLE FROM KEEPING AND BEARING HANDGUNS IN,
6 YOU KNOW, IN YOUR HOME OR IN PUBLIC.

7 AND I THINK IF YOU LOOK AT BRUEN AND HELLER, WHICH
8 INVOLVED COMPLETE BANS WHICH, AS THE COURT POINTED OUT, WAS ON
9 AN ENTIRE CLASS OF ARMS, YOU ARE JUST TALKING ABOUT AN
10 ENTIRELY DIFFERENT SITUATION.

11 **THE COURT:** AS PLAINTIFFS ARGUE IT, THOUGH, IT IS A
12 COMPLETE BAN ON ALL OF THE NEW GUNS SINCE 2013, BASICALLY. SO
13 IT IS NOT A BAN ON HANDGUNS, BUT IT IS A BAN ON A CLASS OR
14 GROUP OF HANDGUNS, THE NEWER MODELS SINCE 2013.

15 **MS. BOUTIN:** BUT, AGAIN, I THINK -- I THINK -- I
16 UNDERSTAND THE POINT YOU ARE MAKING. AND, AGAIN, I WOULD JUST
17 POINT TO THE FACT WHEN WE SAY IT -- IT -- IT IS A BAN, ALL OF
18 THE PROVISIONS ARE NOT -- IT IS NOT A BAN.

19 IT -- IF ONE WERE TO TAKE -- TAKE THE PLAINTIFFS'
20 POINT OF VIEW I THINK IT WOULD BE FAIR TO SAY MANUFACTURERS
21 CHOOSE NOT TO INCLUDE THESE -- INCLUDE THESE SAFETY DEVICES
22 WITH THE CERTAIN MODELS THEY MANUFACTURE. AND AS A RESULT OF
23 THAT CHOICE THEN THOSE GUNS ARE NOT AVAILABLE TO BE, YOU KNOW,
24 PURCHASED IN CALIFORNIA. I THINK THAT IS FAIR.

25 BUT, AGAIN, WHEN WE SAY IT IS A BAN I THINK IT IS

1 REALLY IMPORTANT THAT WE KNOW WHAT LAW WE ARE TALKING ABOUT.
2 ARE WE TALKING ABOUT THE REQUIREMENT THAT A HANDGUN HAVE A
3 SAFETY? NO. ARE WE TALKING ABOUT -- YOU KNOW, WHAT ARE WE
4 TALKING ABOUT, BECAUSE WE CAN'T TAKE ABOUT THE UHA AS ONE LAW
5 BECAUSE IT IS NOT ONE LAW. CERTAINLY IT IS VERY CLEAR IN THE
6 CONTEXT OF INJUNCTIONS IT HAS TO BE AS NARROWLY TAILORED AS
7 POSSIBLE.

8 AND THESE WERE VARIOUS ENACTMENTS OVER TIME THAT, AS
9 WE KNOW FROM THE NUMBERS, HAD DIFFERENT AFFECTS ON -- ON THE
10 NUMBER ON THE ROSTER.

11 SO I DO THINK IT IS IMPORTANT WHEN WE TALK ABOUT
12 SOMETHING, YOU KNOW, CAUSING AN AFFECT ON THE SECOND
13 AMENDMENT.

14 **THE COURT:** DON'T ALL OF THESE LAWS THAT COME IN AT
15 DIFFERENT TIMES, THOUGH, COME TOGETHER. BECAUSE THE
16 PLAINTIFFS' ARGUMENT IS THAT WHEN YOU LOOK AT THEM ALL
17 COLLECTIVELY, AND THEN UNDER THE ROSTER PROVISION, CALIFORNIA
18 IS BANNING THE SALE OF THESE HANDGUNS UNLESS THEY HAVE THESE
19 THREE CRITERIA MET, AND THEN IT GOES INTO THE THREE-FOR-ONE
20 ROSTER. SO IT SEEMS TO PULL THE WHOLE THING TOGETHER.

21 **MS. BOUTIN:** I THINK THERE ARE KIND OF TWO LEVELS OF
22 ANSWER TO YOUR QUESTION.

23 ONE IS, I THINK YOU ARE REFERRING TO THE MAGAZINE
24 DISCONNECT MECHANISM, CHAMBER LOAD INDICATOR, AND
25 MICROSTAMPING AS A BUBBLE. THEY ARE ALSO CHALLENGING NUMEROUS

1 OTHER STATUTES AND SUBSECTIONS OF STATUTES THAT ARE WITHIN THE
2 UHA.

3 SO I THINK THOSE NEED TO BE KIND OF TAKEN OUT OF THE
4 EQUATION BECAUSE, AGAIN, THERE HAS BEEN NO SHOWING OF
5 CAUSATION THAT ANY OF THOSE CAUSE HANDGUNS NOT TO BE ON THE
6 ROSTER.

7 BUT THEN, AGAIN, WHEN YOU LOOK AT THESE THREE, DO WE
8 KNOW FOR SURE THAT ALL OF THEM ARE CAUSING HANDGUNS NOT TO BE
9 ADDED TO THE ROSTER; OR, YOU KNOW, COULD IT BE THAT
10 MANUFACTURERS JUST DON'T WANT TO PRODUCE ONE OF THEM.

11 THEY HAVE NOT PROVEN THAT IT IS ALL THREE,
12 ESPECIALLY WHEN YOU LOOK AT WHAT THE NUMBERS ARE.

13 **THE COURT:** ALL RIGHT.

14 SO PERHAPS I CAN TURN TO YOU, MR. BENBROOK.

15 IT IS NOT REALLY A SEVERABILITY ARGUMENT, BUT I
16 THINK THE STATE IS FAIRLY ASKING FOR PRECISION AS TO WHAT
17 WOULD THE INJUNCTION BE FOCUSED ON, EACH OF THESE VARIOUS
18 PROVISIONS COLLECTIVELY, OR HOW WOULD THIS WORK.

19 **MR. BENBROOK:** YES, YOUR HONOR. AND IF I MAY
20 ADDRESS THAT, AND THEN GO BACK TO SOME OF THE THINGS YOU HAVE
21 BEEN SPEAKING ABOUT.

22 **THE COURT:** YES.

23 **MR. BENBROOK:** SO YOUR HONOR IS RIGHT. WE DO
24 CHALLENGE THE UHA AS A WHOLE. ALL OF THESE PROVISIONS WORK
25 TOGETHER TO BAN GUNS IN COMMON USE FROM BEING AVAILABLE FOR

1 SALE AT LICENSED FIREARM DEALERS.

2 THE WAY FOR THE STATE TO TRY TO SAVE SOME OF THOSE
3 PROVISIONS IS THROUGH THE SECOND STEP IN BRUEN. IF THEY
4 WANTED TO TRY TO ANALOGIZE TO SOME OF THE PARTICULAR
5 PROVISIONS AND SAY, WELL, PERHAPS THAT -- I MEAN, PERHAPS THAT
6 IS A WAY FOR THEM TO GO ABOUT IT. WHETHER YOU CALL IT UNDER A
7 SEVERABILITY UMBRELLA OR NOT, YOU FIT IT WITHIN BRUEN, IF THE
8 STATE WERE TO SAY, WELL, THERE IS -- THERE IS A
9 WELL-ESTABLISHED TRADITION OF THIS TYPE OF REGULATION SO THIS
10 PART OF THE UHA SHOULD SURVIVE.

11 BUT, UNDER BRUEN, WE HAVE -- WE HAVE TO SHOW THAT
12 THE OPERATION OF THIS LAW HAS -- HAS IMPACTED THE CONDUCT WE
13 WANT TO ENGAGE IN AS COVERED BY THE -- BY THE SECOND
14 AMENDMENT.

15 THE CONDUCT WE WANT TO ENGAGE IN, AS YOUR HONOR
16 QUOTED FROM OUR PAPERS, IS PURCHASE, KEEPING, AND BEARING ARMS
17 THAT ARE CURRENTLY BANNED BY THE ROSTER.

18 AND THE ROSTER PROHIBITS GUNS FOR ALL KINDS OF --
19 FOR MANY OF THESE REASONS. SO THAT CAN'T BE DISPUTED.

20 **THE COURT:** A NARROW FOCUS WOULD BE ON THE ROSTER
21 PROVISION, THE MOST RECENT ONE WHICH BANS, IN CONJUNCTION
22 PERHAPS WITH ANOTHER STATUTE, BANS THE SALE OF HANDGUNS IN
23 CALIFORNIA UNLESS IT HAS THOSE THREE FEATURES.

24 **MR. BENBROOK:** WELL, TO BE FAIR, YES, THAT
25 CLEARLY -- I DON'T THINK IT CAN BE DISPUTED THAT THAT HAS THE

1 LARGEST IMPACT ON THE HUGE NUMBER OF HANDGUNS THAT AREN'T
2 AVAILABLE FOR SALE. BUT I DON'T THINK THE STATE PUBLICIZES
3 REASONS WHY EACH ONE ISN'T ON THE ROSTER.

4 AND SO THE POINT, THE THRUST OF THE ARGUMENT, THE
5 THRUST OF OUR CASE IS, BANNING GUNS IN COMMON USE, FOR
6 WHATEVER REASON, VIOLATES THE SECOND AMENDMENT.

7 AND IT IS UP TO THE STATE TO JUSTIFY THE BAN BY
8 POINTING TO HISTORY, A WELL-ESTABLISHED TRADITION OF ANALOGOUS
9 REGULATION.

10 **THE COURT:** SO WHETHER IT IS MICROSTAMPING OR CLI OR
11 MDM, THE ARGUMENT IS GUNS THAT DON'T HAVE ANY ONE OF THOSE
12 THREE ARE IN COMMON USE THROUGHOUT. AND UNDER THE PLAIN TEXT
13 THEY ARE COVERED BY THE SECOND AMENDMENT, AND NOW THE STATE
14 HAS TO JUSTIFY ANY ONE OF THESE PROVISIONS.

15 **MR. BENBROOK:** EXACTLY. YES.

16 SO CAN I TALK FOR A LITTLE WHILE ABOUT COMMON USE?

17 **THE COURT:** YES.

18 **MR. BENBROOK:** BECAUSE I THINK A LOT OF THE THREADS
19 THAT ARE -- THAT WERE BEING DISCUSSED EARLIER KIND OF
20 CONGREGATE AROUND COMMON USE, AND THE ANSWERS WILL BECOME
21 CLEAR ON A NUMBER OF THESE POINTS.

22 SO, WE STATED IN THE COMPLAINT, IN THE BRIEFING AND
23 IN THE PHILLIPS DECLARATION, THAT OFF-ROSTER HANDGUNS ARE IN
24 COMMON USE.

25 WE DID NOT NEED TO DO THAT BECAUSE HELLER

1 ESTABLISHES THAT HANDGUNS, AS A CATEGORY, ARE IN COMMON USE,
2 AT 554 U.S. AT 629.

3 BRUEN REAFFIRMS THIS POINT, 142 SUPREME COURT AT
4 2143.

5 AND HELLER SHOWS THAT HANDGUNS IN COMMON USE CANNOT
6 BE BANNED.

7 NOW, AND THIS GETS TO THE DISCUSSION ABOUT
8 LIMITATION. IT SPRINGS FROM HELLER'S STATEMENT THAT THE
9 SECOND AMENDMENT IS NOT UNLIMITED. IT DOESN'T CARRY -- IT
10 DOESN'T COVER -- IT DOESN'T CREATE THE RIGHT TO KEEP AND CARRY
11 ANY WEAPON WHATSOEVER IN ANY MANNER WHATSOEVER AND FOR
12 WHATEVER PURPOSE. BUT IT FOLLOWED UP IMMEDIATELY WITH THE
13 STATEMENT THAT THE SORTS OF WEAPONS PROTECTED BY THE SECOND
14 AMENDMENT WERE THOSE IN COMMON USE AT THE TIME THE SECOND
15 AMENDMENT WAS ADOPTED. AND THEN THERE IS A SEPARATE
16 DISCUSSION ABOUT THAT MEANS IT STILL APPLIES TO WEAPONS IN
17 COMMON USE TODAY.

18 SO WHAT HELLER IS SAYING IS, IF IT IS IN COMMON USE
19 IT IS PROTECTED BY THE SECOND AMENDMENT AND IT CAN'T BE
20 BANNED.

21 THE LIMITATION IS A LIMITATION ON THE SCOPE OF THE
22 SECOND AMENDMENT AND SO WHAT THAT PASSAGE THAT COUNSEL
23 CITES -- SUPPORTS OUR CASE. IT SAYS THE WEAPONS PROTECTED BY
24 THE SECOND AMENDMENT ARE THOSE IN COMMON USE; THAT MEANS IT IS
25 WITHIN THE PROTECTION OF THE SECOND AMENDMENT. AND FOR THAT

1 PROPOSITION IT CITES MILLER, THE MACHINE GUN CASE. SO IF IT
2 IS COMMON THEY ARE PROTECTED.

3 AND SO THIS SPILLS OVER, THEN, INTO THE STATE'S
4 DISCUSSION ABOUT SUGGESTING THAT MORE EVIDENCE IS NEEDED AS TO
5 WHETHER OFF-ROSTER HANDGUNS ARE IN COMMON USE.

6 WE DON'T NEED TO INTRODUCE ANY EVIDENCE ABOUT THAT.
7 THIS CASE DOESN'T TURN ON HOW MANY OF A SINGLE GUN OR 50 GUNS
8 OR 200 GUNS ARE SOLD IN 47 OTHER STATES. HANDGUNS, AS A
9 CATEGORY, ARE IN COMMON USE. OFF-ROSTER HANDGUNS ARE
10 HANDGUNS, AND HELLER ESTABLISHES THAT THEY ARE IN COMMON USE
11 AND THEREFORE CAN'T BE BANNED.

12 AND SO JUST TO POINT OUT HOW THIS REALLY IS AN
13 EFFORT TO DELAY, THEY REALLY DON'T ACTUALLY, IN THEIR PAPERS,
14 DISPUTE THAT OFF-ROSTER HANDGUNS ARE IN COMMON USE THROUGHOUT
15 THE 47 OTHER STATES.

16 AND I WOULD NOTE, JUST AS A TECHNICAL MATTER, THERE
17 HASN'T BEEN COMPLIANCE WITH RULE 56 TO SAY, WE NEED DISCOVERY
18 INTO THIS BECAUSE WE THINK WE ARE GOING TO FIND A, B, AND C.

19 THEY DON'T DISPUTE THAT THESE GUNS, THESE OFF-ROSTER
20 HANDGUNS, ARE IN COMMON USE. AND IF YOU GET DOWN IN THE WEEDS
21 AND LOOK AT THE THIRD-AMENDED COMPLAINT AND THE ANSWER, IT IS
22 ANOTHER REASON WHY THIS ARGUMENT DOESN'T WORK.

23 I MEAN, HELLER IS THE ULTIMATE REASON WHY IT DOESN'T
24 WORK, BUT THIS IS A TECHNICAL LOGISTICAL MATTER HERE AMONG
25 THE -- IN THE LITIGATION.

1 PARAGRAPHS 80 TO 83 OF THE THIRD-AMENDED COMPLAINT
2 GO THROUGH THE DIFFERENT FEATURES REQUIRED BY THE LAW AND SAY
3 HANDGUNS WITHOUT THOSE FEATURES ARE STILL IN COMMON USE.

4 PARAGRAPH 109, THIRD-AMENDED COMPLAINT, SUMS IT ALL
5 UP AND SAYS THIS FUNDAMENTAL INDIVIDUAL RIGHT TO KEEP AND BEAR
6 FIREARMS INCLUDES THE RIGHT TO ACQUIRE MODERN HANDGUNS IN
7 COMMON USE FOR LAWFUL PURPOSES. INDEED, ARMS THAT ARE
8 LAWFULLY SOLD AND POSSESSED THROUGHOUT THE UNITED STATES, SUCH
9 AS THOSE THE HANDGUN BAN PREVENTS THE COMMON LAW-ABIDING
10 CITIZENS FROM PURCHASING.

11 SO LOOK AT THE STATE'S ANSWER TO THESE ALLEGATIONS.
12 IN EACH CASE, PARAGRAPHS 80 TO 83 AND PARAGRAPH 109, THE STATE
13 SAYS THE ALLEGATION CONSISTS OF LEGAL ARGUMENTS AND/OR
14 CONCLUSIONS THAT DO NOT REQUIRE ADMISSION OR DENIAL. TO THE
15 EXTENT DENIAL IS REQUIRED, DEFENDANTS DENY THE ALLEGATIONS.

16 IF THIS WAS REALLY SUBJECT TO DISPUTE, LIKE AN
17 ADJUDICATED FACT THAT WOULD BE SUBJECTED TO EVIDENCE, YOU CAN
18 BE ASSURED THE STATE WOULD HAVE DISPUTED IT. IT IS NOT
19 SUBJECT TO DISPUTE BECAUSE IT IS A LEGISLATIVE FACT THAT
20 HELLER ALREADY ESTABLISHED.

21 IF YOUR HONOR WOULD LIKE, I CAN PUT A LITTLE MORE
22 MEAT ON THE BONE ABOUT HOW HELLER DID THAT.

23 **THE COURT:** THAT'S OKAY.

24 **MR. BENBROOK:** SO, LET'S SEE.

25 THE SHORT ANSWER, OR THE SHORT SORT OF SUM-UP TO

1 THAT TALK PART, IS MORE TIME IS NOT NEEDED TO GET INTO COMMON
2 USE ISSUES.

3 AND THE -- ONE THING I HAVE TO RESPOND TO IS THIS --
4 THIS CAUSATION ARGUMENT. I AM NOT FOLLOWING HOW THAT COULD
5 POSSIBLY WORK.

6 THE SUGGESTION IS THAT WE DON'T KNOW WHY THE
7 MANUFACTURERS AREN'T PRODUCING GUNS THAT COMPLY WITH OUR LAW
8 AND THEREFORE WE CAN'T SHOW THE LAW IS CAUSING IT?

9 THE REALITY IS, THE LAW EXISTS, THE LAW BANS THE
10 GUNS THAT ARE BEING MANUFACTURED; AND THAT'S THE END OF THE
11 DISCUSSION.

12 **MS. BOUTIN:** CAN I RESPOND THAT THAT POINT JUST
13 BEFORE I FORGET MY THOUGHTS ON THAT?

14 **THE COURT:** YES.

15 **MS. BOUTIN:** THERE HAS BEEN NO SHOWING OF WHICH
16 FEATURES OF THE GUNS DON'T COMPLY WITH THE UHA. THERE IS NO
17 SHOWING OF DO THE GUNS NOT ON THE ROSTER NOT HAVE A SAFETY.
18 COULD THEY NOT COMPLY WITH THE DROP SAFETY REQUIREMENTS.

19 SO TO SAY THAT THEY DON'T -- THAT THEY DON'T COMPLY
20 WITH THE PROVISIONS AS A WHOLE, MAYBE THEY WOULD -- MAYBE WHEN
21 IT COMES TO DO THEY HAVE A SAFETY, MAYBE THEY ALL HAVE
22 SAFETIES. AGAIN, WE DON'T KNOW.

23 YOU ARE LUMPING TOGETHER ALL OF THESE REQUIREMENTS
24 AND SAYING IT IS ONE THING, BUT THEY ARE SEPARATE
25 REQUIREMENTS. AND JUST BECAUSE THEY ARE IN THE SAME PART OF

1 THE PENAL CODE DOESN'T MEAN YOU CAN SAY THEY COLLECTIVELY
2 PREVENT THIS WHOLE SET OF FIREARMS FROM BEING LEGAL IN
3 CALIFORNIA TO BE SOLD.

4 I AM SORRY. I DON'T WANT TO INTERRUPT SINCE YOU ARE
5 STILL GOING, SO PLEASE PROCEED.

6 **MR. BENBROOK:** YEAH. I HAVE ALREADY ADDRESSED THAT,
7 YOUR HONOR.

8 THE GUNS THAT AREN'T ON THE ROSTER ARE IN COMMON USE
9 AND THEREFORE CAN'T BE BANNED. SO THAT'S THE SHOWING WE NEED
10 TO MAKE, WHICH WE HAVE DONE. AND SO, THEREFORE, THE QUESTION
11 THEN COMES TO THE HISTORICAL ANALYSIS, WHICH THE STATE ALSO
12 HAS NOT BEEN ABLE TO CARRY ITS BURDEN.

13 **THE COURT:** GUNS THAT ARE IN COMMON USE CAN BE
14 BANNED IF THE STATE MEETS THE SECOND PRONG. WOULD THAT BE
15 FAIR? IF SHOWING --

16 **MR. BENBROOK:** WELL --

17 **THE COURT:** -- HISTORICAL ANALOG.

18 **MR. BENBROOK:** ACTUALLY, NO. I DON'T WANT TO
19 SUGGEST THAT BECAUSE WE STATE, AND THE STATE DOESN'T
20 ADEQUATELY RESPOND TO IT, HELLER ESTABLISHES THAT BECAUSE --
21 HELLER'S HISTORICAL ANALYSIS ESTABLISHES THAT THE DANGEROUS
22 AND UNUSUAL LIMITATION ON THE SCOPE ESTABLISHES THAT GUNS THAT
23 ARE IN COMMON USE ARE PROTECTED BY THE SECOND AMENDMENT; AND,
24 IN OTHER WORDS, CAN'T BE BANNED. I MEAN, THAT'S -- THAT'S OUR
25 SORT OF TOP-LINE ARGUMENT.

1 **THE COURT:** WHAT ABOUT HELLER'S --

2 **MR. BENBROOK:** BUT EVEN IF YOU DON'T ACCEPT THAT
3 ARGUMENT WE GO THROUGH THE STEPS.

4 **THE COURT:** HELLER ALSO SETS OUT OTHER LIMITATIONS
5 TO THE SECOND AMENDMENT, INCLUDING FELONS, MENTAL HEALTH
6 ISSUES, SENSITIVE PLACES, DANGEROUS AND UNUSUAL, AND IT
7 MENTIONS CONDITIONS ON THE COMMERCIAL SALE OF ARMS.

8 SO, IN SOME WAYS I THINK THE STATE IS ARGUING, OR
9 MAYBE IT IS DIRECTLY ARGUING, THAT THE UHA OPERATES AS
10 CONDITIONS ON THE COMMERCIAL SALE OF ARMS, AND HELLER WOULD
11 ALLOW FOR SOME CONDITIONS. THESE ARE GOOD CONDITIONS, THEY
12 PROMOTE SAFETY.

13 HOW DO YOU RESPOND TO THAT ARGUMENT?

14 **MR. BENBROOK:** I RESPOND THAT YOUR HONOR CONSIDERED
15 A VERY SIMILAR ARGUMENT IN THIS CASE BEFORE BRUEN AND REJECTED
16 IT AT THE MOTION TO DISMISS STAGE. THAT IS DOCKET NO. 17,
17 PAGES 9 THROUGH 12.

18 THAT ANALYSIS WAS DONE EVEN BEFORE BRUEN CAME OUT.
19 AND BRUEN, OF COURSE, ELABORATED AND CLARIFIED ON HELLER WITH
20 THE TEXT AND HISTORY TEST.

21 THE SHORTEST, AND I THINK BEST, ANSWER TO YOUR
22 QUESTION IS THE LANGUAGE IN HELLER THAT SAYS WE DON'T CALL
23 INTO QUESTION LONGSTANDING REGULATIONS AND -- BUT
24 COMMERCIAL -- CONDITIONS AND QUALIFICATIONS ON COMMERCIAL SALE
25 OF ARMS, BECAUSE THERE MAY HAVE BEEN SOME LONGSTANDING

1 QUALIFICATIONS IT DOESN'T MEAN ANY NEW QUALIFICATION IS
2 PRESUMPTIVELY LAWFUL. AND THIS PLAINLY IS A VERY NEW STYLE OF
3 REGULATION.

4 SO I THINK THAT'S THE SHORTEST AND BEST ANSWER.

5 **THE COURT:** ALL RIGHT.

6 ANY OTHER RESPONSES OR COMMENTS TO THE COURT'S
7 INITIAL QUESTIONS OF THE STATE?

8 **MR. BENBROOK:** NOT THAT I FEEL LIKE I NEED TO COVER
9 RIGHT NOW.

10 **THE COURT:** ALL RIGHT.

11 SO IF WE ASSUME THAT THE UHA, ITS VARIOUS
12 PROVISIONS, ARE COVERED BY THE SECOND AMENDMENT, THEN WE GO
13 INTO THE SECOND PRONG WHERE THE BURDEN IS ON THE STATE TO
14 IDENTIFY A REGULATION THAT IS CONSISTENT -- OR TO SHOW THAT
15 THIS REGULATION, THE UHA AND ITS VARIOUS PROVISIONS, ARE
16 CONSISTENT WITH THIS NATION'S HISTORICAL TRADITION OF FIREARM
17 REGULATION.

18 AND HERE, THE STATE HAS COME FORWARD WITH TWO
19 PRINCIPAL KINDS OF REGULATIONS. ONE HAS TO DO, I THINK, WITH
20 THE 1805 LAW IN MASSACHUSETTS DEALING WITH HAVING THE GUN
21 TESTED TO MAKE SURE IT DISCHARGES, IT IS OPERABLE. AND THEN
22 IT GETS STAMPED OR SERIALIZED.

23 AND THEN THE SECOND BATCH OF LAW RELATES TO 19TH
24 CENTURY FIRE SAFETY REGULATIONS ALLOWING OR PROHIBITING
25 GUNPOWDER, I THINK ALLOWING FOR SEARCH AND INSPECTION, THAT

1 KIND OF THING.

2 AND THE PLAINTIFFS' ARGUMENT IS THAT IS NOT PRECISE
3 ENOUGH. THAT ONE HAS TO DO WITH PREVENTING FIRES WHEN THERE
4 WERE A LOT OF WOODEN HOMES AND CANDLES, AND DOESN'T HAVE
5 ANYTHING TO DO WITH HANDGUN SAFETY. AND THEN THE
6 MASSACHUSETTS LAW HAS TO DO WITH OPERABILITY, MAKING SURE IT
7 WORKS, IT FIRES, BUT IT IS NOT REQUIRING CERTAIN SAFETY
8 FEATURES OR NOT NEARLY THAT NARROW SO THAT THEY ARE GENERALLY
9 OFF TOPIC.

10 HOW DO YOU RESPOND TO THOSE ARGUMENTS?

11 **MS. BOUTIN:** SURE, YOUR HONOR.

12 JUST HAVING TO DO WITH YOUR LAST POINT, I THINK WHEN
13 WE ARE GETTING INTO THE NUANCES OF THE LAW AND ALSO WHEN WE
14 ARE TALKING ABOUT THEIR JUSTIFICATION AND THEIR PURPOSE,
15 BECAUSE BRUEN TELLS US WE LOOK TO WHETHER THERE IS COMPARABLE
16 JUSTIFICATION FOR THE LAW COMPARED TO TODAY'S LAW AND WHETHER
17 THERE IS COMPARABLE PURPOSE.

18 I THINK WHAT THIS GOES TO SHOW IS THAT IT IS A MORE
19 COMPLICATED ANALYSIS THAN JUST LOOKING AT THE PLAIN TEXT OF A
20 LAW AND WHERE IT WAS AND WHAT YEAR, AND IT IS WHY HAVING
21 HISTORIANS TAKE A LOOK AT IT AND HAVING HISTORIANS INVOLVED TO
22 BE ABLE TO INTERPRET THE LAWS AND WHAT WAS BEHIND THEM AND
23 WHAT THE BURDEN WAS AND WHAT THE PURPOSE WAS. AND I THINK
24 THAT THAT -- IT SHOWS WHY THAT IS IMPORTANT AND IT SHOWS WHY
25 THIS IS A VERY COMPLEX AND TIME-CONSUMING UNDERTAKING.

1 BUT TO TAKE A STEP BACK FURTHER. I THINK -- I THINK
2 YOUR UNDERSTANDING OF WHERE PLAINTIFF IS COMING FROM IS
3 CORRECT. AND I THINK WHAT IS IMPORTANT TO LOOK AT HERE IS,
4 AGAIN, THE WAY THAT BRUEN TELLS US TO LOOK FOR THESE
5 ANALOGIES.

6 AS BRUEN SAYS, YOU ARE LOOKING FOR HISTORICAL
7 ANALOGS, NOT HISTORICAL TWINS. THAT IS THE PHRASE THAT THE
8 COURT USES. AND IT KIND OF SETS FORTH TWO WAYS IN WHICH AN
9 ANALOGY MAY BE BROAD, AND BROADER THAN WAS THE CASE IN BRUEN
10 BECAUSE THE COURT SAID IN BRUEN THESE -- THESE TWO THINGS DID
11 NOT APPLY. ONE IS THAT THERE ARE TECHNOLOGICAL ADVANCEMENTS
12 SINCE THE HISTORICAL TIMES IN QUESTION; AND, TWO, IF THERE ARE
13 CHANGES IN SOCIETAL CONCERNS. AND BOTH OF THOSE APPLY HERE
14 AND ALLOW FOR BROAD ANALOGY.

15 IN THE CASE OF TECHNOLOGY, IF WE ARE TALKING ABOUT
16 THE CLI, MDM, AND MICROSTAMPING, AND PERHAPS TO SOME EXTENT IF
17 WE ARE TALKING ABOUT SOME OF THE OTHER TECHNOLOGICAL FEATURES,
18 YOU KNOW, THAT WAS NOT -- THAT WAS NOT TECHNOLOGICALLY
19 FEASIBLE, CERTAINLY AT THE TIME OF THE FOUNDING AND IN MOST
20 TIMES IN HISTORY.

21 YOU KNOW, HANDGUNS WERE NOT EVEN WIDESPREAD UNTIL
22 THE 1800'S, SO CERTAINLY HAVING THOSE TECHNICAL FEATURES ON
23 THE GUNS WAS NOT HAPPENING DURING MUCH OF HISTORY. AND
24 BECAUSE THEY WERE NOT AS WIDESPREAD THERE WASN'T AS MUCH OF A
25 SOCIETAL CONCERN ABOUT ACCIDENTAL DISCHARGES AND WHEN IT COMES

1 TO CHILDREN.

2 SO THOSE TWO METRICS SET FORTH BY THE COURT ALLOW
3 FOR A BROADER ANALOGY.

4 AND THESE GUNPOWDER LAWS THAT WE ARE TALKING ABOUT,
5 IN PARTICULAR, WERE EXTREMELY WIDESPREAD. I THINK WE ONLY
6 SUBMITTED AS EXHIBITS TWO, BUT AS DR. CORNELL SAYS IN HIS
7 DECLARATION, THEY ARE INCREDIBLY PREVALENT. AND HE HAS
8 ALREADY IDENTIFIED MANY MORE, AND MANY MORE HAVE BEEN LISTED
9 IN THE MILLER CASE AND IN OTHER CASES. SO THIS IS A QUESTION
10 OF MANY, MANY WIDESPREAD REGULATIONS OF HOW GUNPOWDER IS
11 STORED.

12 AND WE ARE TALKING ABOUT -- SO WHAT WE ARE TALKING
13 ABOUT IS LAWS THAT REGULATED HOW YOU KEPT FIREARMS AND THEIR
14 COMPONENTS FROM CREATING ACCIDENTS AND FROM BEING SAFE. THAT
15 IS WHAT WE ARE TALKING ABOUT AS FAR AS ANALOGY.

16 OF COURSE WE ARE NOT GOING TO HAVE MICROSTAMPING
17 BACK IN 1776. RIGHT? OF COURSE WE ARE NOT GOING TO HAVE, YOU
18 KNOW, MAGAZINE DISCONNECT MECHANISM BACK IN 1776.

19 SO I THINK A BROADER ANALOGY TOWARDS PREVENTING
20 ACCIDENTS FROM LOADED FIREARMS, WHETHER IT IS, OKAY, YES, THEY
21 CAUSE FIRES OR IS IT ACCIDENTAL DISCHARGE, I MEAN, FRANKLY, IT
22 PROBABLY -- STORAGE OF GUNPOWDER PROBABLY HELPED BOTH
23 PROBLEMS. BUT, EITHER WAY, WE ARE TALKING ABOUT ACCIDENTS
24 THAT HAPPEN FROM LOADED GUNS.

25 SO I THINK THAT KIND OF ANALOGY IS FINE, IT DOESN'T

1 HAVE TO BE A HISTORICAL TWIN TO BE JUSTIFIED.

2 AND, AGAIN, THEN THAT NEXT STEP. I SPOKE BEFORE
3 ABOUT COMPARABLE BURDENS AND COMPARABLE JUSTIFICATIONS, AGAIN,
4 THE JUSTIFICATION IS -- IS COMPARABLE. WE ARE TALKING ABOUT
5 KEEPING WEAPONS AND PEOPLE WHO HAVE WEAPONS IN THEIR HOMES
6 SAFE.

7 AS FAR AT THE BURDEN GOES, AGAIN, WE ARE TALKING
8 ABOUT HAVING 800 DIFFERENT MODELS OF IPHONES 13'S AVAILABLE AS
9 OPPOSED TO ALSO HAVING SOME IPHONE 14'S AVAILABLE. SO IT IS
10 GENUINELY NOT A LARGE BURDEN TO THE CORE SECOND AMENDMENT
11 RIGHT OF SELF-DEFENSE.

12 **THE COURT:** THE GUNPOWDER LAWS, DID IT RELATE TO
13 ARMS THAT WERE LOADED, OR WAS THE FOCUS MORE ON GUNPOWDER.
14 BECAUSE THEN, AT THAT TIME, YOU HAD TO PUT POWDER DOWN THE
15 MUSKET AND YOU HAD TO STORE POWDER. SO WEREN'T THEY FOCUSED
16 MORE ON THE --

17 **MS. BOUTIN:** THERE IS SO MANY --

18 **THE COURT:** -- PREVALENCE OF POWDER?

19 **MS. BOUTIN:** THERE IS SO MANY DIFFERENT KINDS OF
20 LAWS, I DON'T WANT TO MAKE A REPRESENTATION THAT ISN'T
21 ACCURATE ON THAT.

22 I DON'T KNOW, WITH CERTAINTY. THERE MAY WELL
23 HAVE BEEN -- I AM SURE THAT -- I KNOW FOR A FACT SOME HAVE TO
24 DO WITH STORING, YOU KNOW, LARGER QUANTITIES. THAT IS TRUE.
25 BUT I DON'T KNOW, SITTING HERE TODAY, HOW MANY OF THEM HAD TO

1 DO WITH WHETHER OR NOT YOU CAN KEEP GUNPOWDER IN THE ACTUAL
2 GUN.

3 **THE COURT:** AND WHAT ABOUT THE 1805 MASSACHUSETTS
4 LAW DEALING WITH TESTING TO SEE IF THE GUN DISCHARGES, AND
5 THEN IS STAMPED. HOW IS THAT ANALOGOUS?

6 **MS. BOUTIN:** SO THAT'S CERTAINLY ANALOGOUS TO, I
7 THINK, SEVERAL OF THE LAWS HAVING TO DO WITH SAFETY. I MEAN,
8 YOU ARE MAKING SURE A GUN WORKS PROPERLY. YOU ARE INSPECTING
9 IT, YOU ARE TESTING IT, AND YOU ARE GIVING IT THE GOVERNMENT
10 AND THE -- AND I AM GOING TO SAY IT WRONG -- IMPREMATURE
11 [PH.] TO SAY, YES, THE GOVERNMENT APPROVES OF THIS WEAPON,
12 THIS WEAPON IS LEGAL FOR SALE BECAUSE IT PASSES OUR SAFETY
13 TEST.

14 SO THAT IS A VERY, VERY CLOSELY ANALOGOUS LAW TO
15 WHAT WE ARE TALKING ABOUT HERE.

16 **THE COURT:** ARE THERE ANY OTHER LAWS OR REGULATIONS,
17 OTHER THAN THESE TWO GENERAL CATEGORIES?

18 **MS. BOUTIN:** AT THIS TIME THOSE CATEGORIES ARE THE
19 ONES WE HAVE BEEN ABLE TO IDENTIFY. BUT, AS I HAVE SAID
20 BEFORE, WE WOULD LIKE ADDITIONAL TIME TO CONTINUE THE
21 RESEARCH.

22 **THE COURT:** ALL RIGHT.
23 IF I CAN INVITE YOUR RESPONSE.

24 **MR. BENBROOK:** THANK YOU, YOUR HONOR.
25 SO, IT IS CORRECT THAT BRUEN DOES NOT REQUIRE THE

1 ANALOGICAL TWIN. THE REASON -- PART OF THE REASON WHY IT EVEN
2 CONSIDERS ANALOGY IS TO ADDRESS THE ADVANCEMENTS THAT COUNSEL
3 SPOKE ABOUT IN TECHNOLOGY AND OTHER THINGS. BUT BRUEN
4 CAUTIONED THAT, NOTWITHSTANDING THAT, WHEN YOU ARE DOING THIS
5 HISTORICAL ANALYSIS TO LOOK FOR AT LEAST AN ANALOGOUS
6 TRADITION. IT HAS TO BE WELL-ESTABLISHED AND REPRESENTATIVE.

7 AND TO BE SUFFICIENTLY ANALOGOUS IT HAS TO HAVE A
8 SIMILAR HOW AND WHY, AS THE -- AS THE COURT SAID. REGULATE IN
9 A SIMILAR WAY FOR SIMILAR REASONS. AND THE BURDEN, IT
10 STRESSED, NEEDS TO BE COMPARABLE.

11 SO THE WHY HERE IS VERY IMPORTANT. THE STATE IS
12 VERY CANDID THAT THE MAIN REASON IT HAS THIS LAW IS TO CHANGE
13 THE GUN MARKET, TO CHANGE THE WAY MANUFACTURERS OFFER
14 FIREARMS, OFFER HANDGUNS.

15 BUT, IN ANY EVENT, LET'S JUST LOOK AT WHAT THEY PUT
16 UP --

17 ACTUALLY, BEFORE WE DO THAT, TO RETURN TO THE
18 QUESTION OF TIME.

19 PROFESSOR CORNELL IS NOT BASHFUL ABOUT TALKING ABOUT
20 HIS QUALIFICATIONS AND KNOWLEDGE OF THE HISTORY OF GUN
21 REGULATIONS. SO THEY HAVE HIRED A PROFESSOR WHO HOLDS HIMSELF
22 OUT AS AN EXPERT ON THE HISTORY OF GUN REGULATIONS.

23 AND THAT'S HIS -- THAT'S WHAT HE DOES FOR A LIVING.
24 HE SUBMITS DECLARATIONS ALL AROUND THE COUNTRY IN SECOND
25 AMENDMENT CASES. SO HE IS -- HE KNOWS WHAT THE REGULATIONS

1 ARE, IS WHAT I AM GETTING AT. AND SO WE DON'T NEED MORE TIME.

2 BUT, IN ANY EVENT, WE HAVE ADDRESSED THE PROVER LAW,
3 THE 1805 LAW IN MASSACHUSETTS. BUT JUST TO REITERATE, IT
4 CAN'T BE A WELL-ESTABLISHED TRADITION BECAUSE IT IS ONE LAW IN
5 ONE STATE. IT IS A TOTALLY DIFFERENT KIND OF REGULATION. IT
6 TESTED FIRING AT TWO DIFFERENT ANGLES TO MAKE SURE THE GUNS
7 ACTUALLY WORKED AS INTENDED.

8 IT DID NOT REQUIRE ANY FEATURES OF HANDGUNS, MUCH
9 LESS SAFETY FEATURES, AS COUNSEL IS CLAIMING. IT IS NOT A
10 SAFETY LAW, IT IS A LAW -- THE TESTING IS TO SEE IF AT TWO
11 DIFFERENT ANGLES THE GUN FIRED A SPECIFIED NUMBER OF FEET.
12 AND IT DIDN'T SAY, WE ARE NOT GOING TO TEST GUNS THAT DON'T
13 HAVE CERTAIN FEATURES.

14 ANY GUN -- AND HERE IS ANOTHER IMPORTANT LIMITATION.
15 IT IS NOT ANY GUN MANUFACTURED IN MASSACHUSETTS, IT IS ANY GUN
16 MANUFACTURED IN MASSACHUSETTS, OTHER THAN GUNS AT THE
17 SPRINGFIELD ARMORY, WHICH PROFESSOR CORNELL SAYS WAS BY FAR
18 THE LARGEST MANUFACTURER IN THE STATE. SO IT DOESN'T EVEN
19 COVER ALL OF MASSACHUSETTS.

20 **THE COURT:** WHY DID THEY IMPLEMENT THAT LAW? AT
21 THAT TIME THE GOVERNMENT WAS REALLY ENCOURAGING THE
22 MANUFACTURE OF MUSKETS AND OTHER THINGS. AND WAS THERE FRAUD
23 ON THE MARKET, A LOT OF JUNK GUNS, OR DO YOU KNOW?

24 **MR. BENBROOK:** I DON'T KNOW THE ANSWER TO THAT.
25 WHAT IT REALLY SMACKS OF IS ALMOST PROTECTING THE MARKET OF

1 THE SPRINGFIELD ARMORY FROM COMPETITION, POTENTIALLY.

2 **THE COURT:** OR THE SPRINGFIELD ARMORY COULD BE KNOWN
3 AS A RELIABLE GUN MANUFACTURER.

4 **MR. BENBROOK:** YES, THAT IS POSSIBLE AS WELL.

5 AND THE STAMPING REQUIREMENT THERE CANNOT POSSIBLY
6 BE ANALOGIZED TO THE MICROSTAMPING FEATURE HERE. IF A GUN
7 PASSED THE TEST UNDER THE 1805 MASSACHUSETTS LAW, THE PROVER
8 WOULD STAMP HIS INITIALS ON THE BARREL OF THE GUN WITH
9 ORDINARY ENGRAVING TOOLS OF THE TIME.

10 HERE, THE PURPOSE OF THE MICROSTAMPING REQUIREMENT,
11 AS HAS BEEN STATED AND IS STATED IN THE BRIEFING, IS TO HELP
12 SOLVE CRIMES. IT IS NOT ABOUT SAFETY OR OPERABILITY OF GUNS.

13 AND THERE WAS SOME SUGGESTION THAT THE GUNPOWDER
14 STORAGE LAWS WERE -- FELL IN THE CATEGORY OF LAWS TO, QUOTE,
15 KEEP FIREARMS SAFE AND TO PREVENT ACCIDENTS FROM LOADED GUNS.

16 THAT CAN'T BE THE CASE WITH GUNPOWDER LAWS.
17 GUNPOWDER LAWS, SUCH AS THE ONE CITED IN EXHIBIT 5 TO
18 PROFESSOR CORNELL'S DECLARATION, IS JUST SIMPLY A LIMIT ON THE
19 AMOUNT OF GUNPOWDER THAT YOU CAN KEEP IN YOUR HOUSE. AS YOUR
20 HONOR STATED, THAT IS PLAINLY A FIRE SAFETY REGULATION.

21 THE SEPARATE ONE THAT WAS CITED, THE MASSACHUSETTS
22 LAW PROHIBITING STORING LOADED WEAPONS IN BOSTON HOUSES,
23 HELLER ALREADY TALKED ABOUT THAT AND SAID IT IS NOT ABOUT
24 SAFETY IT IS ABOUT ASSISTING FIREFIGHTERS AND PREVENTING
25 FIRES. AND THE TEXT OF THE LAW SAYS IT RIGHT ON ITS FACE IT

1 IS ABOUT FIRE SAFETY.

2 SO THESE -- THESE LAWS ARE NOT SUFFICIENTLY
3 ANALOGOUS TO SAVE THE UHA, YOUR HONOR.

4 **THE COURT:** AND IF THAT IS CORRECT, TELL ME AGAIN
5 WHAT IS THE SCOPE OF THE INJUNCTION, WHAT IS ENJOINED.
6 BECAUSE IN THE ARGUMENT IN THE BRIEFING THE PLAINTIFFS CABINED
7 TOGETHER ALL OF THE VARIOUS PROVISIONS, AND THEN CHARACTERIZE
8 IT AS A HANDGUN BAN. BUT ANY INJUNCTION HAS TO BE SPECIFIC.

9 **MR. BENBROOK:** WELL, YES. WE ARE ASKING TO PREVENT
10 THE OPERATION OF EACH OF THESE FEATURES TO PREVENT -- THAT
11 PREVENT GUNS FROM BEING AVAILABLE FOR SALE -- GUNS IN COMMON
12 USE ELSEWHERE IN THE COUNTRY FROM BEING AVAILABLE FOR SALE IN
13 CALIFORNIA.

14 THE NOTICE ASKS FOR AN INJUNCTION ENJOINING
15 ENFORCEMENT OF THE STATE OF CALIFORNIA'S PROHIBITION ON THE
16 RETAIL SALE OF HANDGUNS THAT ARE NOT LISTED ON THE ROSTER.
17 THAT'S THE SCOPE.

18 **THE COURT:** THAT WOULD INCLUDE ALL OF THESE VARIOUS
19 PROVISIONS.

20 **MR. BENBROOK:** YES.

21 **THE COURT:** BECAUSE IN SOME WAY, SHAPE, OR FORM THEY
22 ARE REGULATING GUNS IN COMMON USE; WHICH THEY CANNOT DO, THE
23 ARGUMENTS YOU HAVE MADE.

24 **MR. BENBROOK:** THAT'S RIGHT, YOUR HONOR.

25 **THE COURT:** THEN GIVE ME YOUR SPECIFIC ARGUMENT AS

1 TO THE ROSTER. THAT IS, OF COURSE, A SEPARATE PROVISION, THE
2 THREE-TO-ONE.

3 **MR. BENBROOK:** WELL, SO, RESPECTFULLY, THAT'S
4 REFERRED TO AS THE ROSTER REMOVAL PROVISION.

5 **THE COURT:** RIGHT.

6 **MR. BENBROOK:** AS OPPOSED TO THE ROSTER.

7 AND IF THE -- IF WE ARE SUCCESSFUL AS TO OUR THEORY,
8 THAT WOULD NECESSARILY GO AWAY BECAUSE THE ROSTER GOES AWAY.

9 AT SOME POINT I WANT TO TALK ABOUT THE OTHER
10 PRELIMINARY INJUNCTION FACTORS, UNDERSTANDING THAT I -- THAT
11 OUR HOPE IS THAT YOUR HONOR IS -- WILL BE PREPARED TO ADDRESS
12 THIS AS A SUMMARY JUDGMENT MOTION. BUT I DON'T WANT TO JUMP
13 THE -- JUMP THE GUN. PARDON ME FOR SAYING THAT. BUT WHEN THE
14 TIME IS RIGHT, PLEASE ALLOW ME TO ADDRESS THAT.

15 **THE COURT:** ALL RIGHT.

16 TURNING TO THE STATE FOR A MOMENT.

17 FIRST, DO YOU HAVE ANY RESPONSES, TOP OF MIND, TO
18 MR. BENBROOK, ANY COMMENTS HE MADE?

19 **MS. BOUTIN:** THANK YOU, YOUR HONOR.

20 I THINK THE MAIN ONE IS -- AND I THINK THIS MAY COME
21 FROM TWO SESSIONS AGO FROM COUNSEL. BUT HE SAID THAT WHEN IT
22 COMES TO LOOKING AT INDIVIDUAL PROVISIONS OF THE UHA, YOU CAN
23 LOOK AT THOSE AT THE SECOND STEP. AND HE SAYS BANNING GUNS
24 FOR ANY REASON IS AGAINST THE SECOND AMENDMENT.

25 IT IS PLAINTIFFS' BURDEN TO SHOW, FOR EACH PROVISION

1 THAT THEY WANT ENJOINED, IT IS THEIR BURDEN TO SHOW, UNDER
2 THEIR THEORY OF THE -- OF PLAIN TEXT READING, THAT THAT
3 PROVISION OF THE UHA, LET'S SAY HAVING A -- REQUIRING A SAFETY
4 ON A GUN, ACTUALLY DOES BAN A GUN. THAT'S THEIR BURDEN IN
5 STEP ONE OF THE ANALYSIS UNDER BRUEN, THEY HAVE TO PROVE THAT
6 THE LAW STOPS THEM FROM KEEPING AND BEARING AN ARM.

7 IF IT ONLY BROUGHT THIS SUIT CHALLENGING THE
8 STATUTORY PROVISION REQUIRING SAFETIES IT WOULD BE OBVIOUS.
9 THEY HAVE NOT SHOWN EVIDENCE THAT THAT REQUIREMENT STOPS THEM
10 FROM PURCHASING ANY HANDGUNS THAT THERE IS. IT JUST DOESN'T.

11 SO I THINK SAYING THAT THAT COMES UP IN STEP TWO IS
12 NOT RIGHT, I THINK IT COMES UP IN STEP ONE. AND THERE IS NO
13 QUESTION THAT THAT IS PLAINTIFFS' BURDEN ON THIS MOTION, AND
14 CERTAINLY WHETHER IT IS PRELIMINARY INJUNCTION OR SUMMARY
15 JUDGMENT.

16 SO I DO THINK IT IS IMPORTANT TO BE CLEAR, THAT IS A
17 STEP-ONE ISSUE.

18 ANOTHER POINT I THINK WE ARE -- I THINK WE ARE GOING
19 TO GET IN A MINUTE TO THE OTHER WINTER FACTORS. I THINK,
20 HOPEFULLY, WE ARE HONING IN ON THE END OF THE MERITS ARGUMENT.

21 I DO WANT TO -- I DO HAVE TWO BROADER POINTS I JUST
22 WANT TO BRING UP TO MAKE SURE THAT I DON'T FORGET TO SAY THEM.

23 ONE, WE ACTUALLY DID COMPLY WITH RULE 56 WHEN IT
24 COMES FOR ASKING FOR DISCOVERY. WE SUBMITTED AN APPLICATION
25 ALONG WITH OUR OPPOSITION TO THAT MOTION SO THAT -- THE ISSUE

1 OF THAT COMPLIANCE IS -- THAT SHOULD NOT BE AN ISSUE.

2 AND THE OTHER IS SIMPLY -- AND I JUST DON'T WANT TO
3 FORGET TO SAY THIS. IF YOUR HONOR IS INCLINED TO GRANT A
4 PRELIMINARY INJUNCTION, OR EVEN SUMMARY JUDGMENT, WE WOULD
5 CERTAINLY ASK THAT THE JUDGE STAY THAT RULING PENDING AN
6 APPEAL, FOR THE RECORD.

7 **MR. BENBROOK:** YOUR HONOR, IF --

8 **THE COURT:** YES.

9 **MR. BENBROOK:** IF WE ARE IN THE CLEANUP MODE ON THIS
10 PART.

11 **THE COURT:** YES.

12 **MR. BENBROOK:** JUST TO BE CLEAR, OUR -- AS I HAVE
13 STATED AT LEAST ONCE, OUR POSITION IS THAT HELLER ESTABLISHED
14 THAT HANDGUNS IN COMMON USE CAN'T BE BANNED. THAT HELLER HAS
15 DONE THE HISTORICAL ANALYSIS. SO, YOU KNOW, MY DISCUSSION
16 ABOUT HISTORY IS IF YOUR HONOR DOESN'T AGREE WITH US ON THAT
17 BROAD TOP-LINE POINT, SO THAT'S MY -- I JUST WANT TO CLARIFY
18 THAT AGAIN.

19 ONE LAST POINT ON THE HISTORY POINT THAT I THINK
20 NEEDS TO BE EMPHASIZED IS THE STATE IS TRYING TO CATEGORIZE
21 ALL OF THESE HISTORICAL LAWS UNDER THE BROAD RUBRIC OF SAFETY,
22 SAY THE STATE HAS REGULATED SAFETY SO WE CAN REGULATE
23 SAFETY -- EXCUSE ME. HISTORICALLY GOVERNMENTS HAVE REGULATED
24 SAFETY SO THEREFORE WE CAN REGULATE SAFETY.

25 I JUST WANT TO EMPHASIZE, THAT IS FAR TOO BROAD A

1 LEVEL OF GENERALITY TO SATISFY WHAT BRUEN CALLS FOR, AS I --
2 AS I SPECIFIED EARLIER.

3 **THE COURT:** IS THAT YOUR OBJECTION, IN PART, TO
4 PROFESSOR CORNELL? HE MAKES THE ARGUMENT THAT HISTORICALLY
5 THE STATES HAVE FREELY EXERCISED POLICE POWER TO PROMOTE
6 SAFETY AND THEY HAVE DONE IT IN THE FIELD OF FIREARMS, AND SO
7 THAT THEY OUGHT TO BE ABLE TO REGULATE HERE, AS THEY ARE,
8 UNDER THE UHA.

9 **MR. BENBROOK:** ABSOLUTELY. MUCH OF HIS DECLARATION
10 IS ALONG THOSE LINES, AS WE NOTED IN THE REPLY BRIEF. AND
11 THAT IS TO THE EXTENT HE DID TRY TO IDENTIFY PARTICULAR
12 REGULATIONS IN THE PAST, THOSE ARE THE ONES WE HONED IN ON IN
13 OUR REPLY.

14 **THE COURT:** ALL RIGHT.
15 WHAT IS YOUR RESPONSE, IF THE COURT WERE TO GRANT
16 PRELIMINARY INJUNCTION OR THE RULE 56 MOTION, THAT IT OUGHT TO
17 BE STAYED PENDING APPEAL?

18 **MR. BENBROOK:** I THINK THAT KIND OF FOLDS IN WITH
19 THE OTHER WINTER FACTORS, FRANKLY, GIVEN THE CONSIDERATIONS ON
20 A STAY. AND THE ARGUMENT -- SO THE STATE'S MAIN ARGUMENT, I
21 BELIEVE, IF THAT WERE TO HAPPEN, JUST I THINK HAS BEEN
22 PREVIEWED ALREADY; WHICH IS, WE CAN'T HAVE THIS ENJOINED
23 BECAUSE IF WE DO ALL OF THESE UNSAFE HANDGUNS, IN QUOTES,
24 UNSAFE HANDGUNS, WILL FLOOD THE MARKET.

25 SO LET'S UNPACK WHAT THAT ARGUMENT WOULD LOOK LIKE.

1 ALL OF THE SEMIAUTOMATIC HANDGUNS THAT ARE BANNED
2 CURRENTLY HAVE ALL OF THE SAME BASIC FEATURES AS THE HUNDREDS
3 OF HANDGUNS THAT ARE GRANDFATHERED IN. HANDGUN, ROUGHLY
4 COMPARABLE LENGTH, FIRES ONE BULLET AT A TIME; THEY ARE IN THE
5 SAME CLASS OR CATEGORY OF HANDGUNS.

6 SO WHAT THE STATE IS SAYING IS WE CAN'T LET NEW GUNS
7 DEVELOPED OVER THE PAST 15 YEARS TO BE SOLD SINCE THEY
8 PROBABLY DON'T HAVE TWO OF THE FEATURES THAT ARE REQUIRED: A
9 CHAMBER LOAD INDICATOR OR THE MAGAZINE DISCONNECT.

10 AND THERE IS NO DISPUTE THEY DON'T ALSO HAVE THE
11 MICROSTAMPING. AND NEVER MIND THAT NO GUN HAS ALL THREE.

12 BUT THIS ARGUMENT BREAKS DOWN WHEN YOU CONSIDER THE
13 GRANDFATHERING OF GUNS THAT ARE ON THE ROSTER.

14 THE GONZALEZ DECLARATION, AT PARAGRAPH 19, SHOWS
15 THAT 829 GUNS ARE ON THE ROSTER CURRENTLY, AND ONLY 32 OF THEM
16 HAVE BOTH FEATURES THAT THE STATE SAY ARE CRITICAL, THE CLI
17 AND THE MAGAZINE DISCONNECT MECHANISM. IN OTHER WORDS, 797 OF
18 THE GUNS DON'T HAVE EITHER.

19 SO THIS GRANDFATHERING DOOMS THE ARGUMENT THAT
20 UNSAFE GUNS WILL POUR IN. AND THE ROSTER REMOVAL, I MEAN --
21 WELL, SCRATCH THAT.

22 NEXT POINT.

23 WE POINT OUT, THROUGH THE PHILLIPS DECLARATION, THE
24 PERVERSE REALITY THAT BY NOT ALLOWING ANY NEW GUNS FOR 15
25 YEARS THE STATE HAS MISSED OUT ON ACTUAL SAFETY IMPROVEMENTS

1 THAT MANUFACTURERS HAVE MADE. SO, RESPECTFULLY, YOUR HONOR,
2 SCAREMONGERING FROM THE STATE IS NOT A BASIS FOR NOT ENJOINING
3 OR FOR STAYING PENDING APPEAL.

4 **THE COURT:** ALL RIGHT.

5 ALTHOUGH, OF COURSE, THE STATE, IF A STAY WERE NOT
6 ISSUED HERE, WOULD SIMPLY SEEK ONE WITH THE NINTH CIRCUIT.

7 **MR. BENBROOK:** LIKELY WOULD, YES. THAT WOULDN'T BE
8 A SURPRISE.

9 **THE COURT:** A QUESTION. I THINK I KNOW THE ANSWER,
10 BUT WANTED TO GET YOUR THOUGHTS ON THIS, AS WELL.

11 IN THE MOTION, I THINK YOU NOTED THAT HAVING A
12 CHOICE IN THE TYPE OF FIREARM IS NEITHER RELEVANT NOR
13 NECESSARY. WHAT DID YOU MEAN BY THAT?

14 **MR. BENBROOK:** WHERE DID I SAY THAT -- WHERE DID WE
15 SAY THAT?

16 **THE COURT:** THERE IS A POINT HERE IN THE MOTION FOR
17 PRELIMINARY INJUNCTION AT PAGE 10. I THINK WHEN THE STATE WAS
18 POINTING OUT THAT PLAINTIFFS DON'T GET TO PICK AND CHOOSE
19 WHICH HANDGUNS THEY WANT, THAT THEY STILL HAVE HANDGUNS ON THE
20 ROSTER THEY CAN PURCHASE.

21 THE ARGUMENT, I THOUGHT, WAS BY THE PLAINTIFF THAT
22 HAVING A CHOICE IN TYPE OF FIREARM IS NEITHER RELEVANT NOR
23 NECESSARY, AT PAGE 10. I THINK THAT MIGHT BE IN THE REPLY.

24 **MR. BENBROOK:** YEAH. THAT DOESN'T SOUND LIKE
25 SOMETHING -- THAT SOUNDS INCONSISTENT WITH WHAT WE ARE

1 ARGUING, YOUR HONOR. THAT IS WHY IT WOULD BE GREAT IF WE
2 COULD FIND AN ACTUAL CITE.

3 **THE COURT:** IF I MAY GET THAT FOR YOU. I THINK IT
4 IS IN YOUR MOTION AT PAGE 10. I AM NOT FINDING IT NOW.

5 **MR. BENBROOK:** WELL, IF THAT STATEMENT WERE MADE
6 SOMEWHERE, THAT DOES NOT SOUND CONSISTENT WITH WHAT WE ARE
7 ARGUING.

8 **THE COURT:** YES.

9 **MR. BENBROOK:** INDEED, CHOICE IS INHERENT IN THE
10 RIGHT TO SELF-DEFENSE.

11 **THE COURT:** OKAY. LET ME TAKE ONE OTHER LOOK HERE.
12 WELL, THAT'S ALL RIGHT.

13 I THINK I HAVE ALL OF MY QUESTIONS ANSWERED. I WAS
14 GOING THROUGH MY NOTES THERE.

15 ARE THERE ANY ADDITIONAL COMMENTS OR POINTS TO MAKE
16 BEFORE WE CLOSE THE HEARING?

17 **MS. BOUTIN:** I WOULD LIKE TO RESPOND, YOUR HONOR.

18 **THE COURT:** YES.

19 **MS. BOUTIN:** THANK YOU.

20 ONE LAST POINT ON THE HISTORICAL ANALOGY ISSUE THAT
21 I THINK IS IMPORTANT IS THAT THE ANALOGOUS CATEGORY OF LAWS IS
22 NOT JUST SAFETY. CERTAINLY FOR MANY OF THE UHA PROVISIONS IT
23 IS NOT JUST LAWS ABOUT SAFETY, IT IS LAWS ABOUT CONTROLLING
24 THE VOLATILITY OF FIREARMS AND THEIR COMPONENTS IN THE -- AND
25 MAKING IT SAFER IN THE HOME TO HAVE THOSE PARTS. IT IS NOT

1 JUST GENERAL GUN SAFETY.

2 I THINK EVERYONE AGREES THAT, YOU KNOW, GUNS HAVE
3 THE POTENTIAL TO BE DANGEROUS. AND SO, YES, A BROAD CATEGORY
4 -- SAFETY IS A FAIRLY BROAD CATEGORY IN THIS CONTEXT. BUT
5 CERTAINLY WHEN WE ARE ANALOGIZING TO A LOT OF THE PROVISIONS
6 YOU CAN GO A LOT NARROWER THAN THAT.

7 THE NEXT POINT. WHEN WE WERE TALKING ABOUT THE
8 INJUNCTION FACTORS PLAINTIFFS' COUNSEL SPOKE ABOUT THE BURDEN
9 ON THE STATE SAYING THAT, YOU KNOW, UNSAFE HANDGUNS AREN'T
10 GOING TO, YOU KNOW, POUR IN IF THERE IS, I GUESS -- AN
11 INJUNCTION AND STAY ARE SIMILAR IN A SENSE BECAUSE IN BOTH
12 CASES WE ARE TALKING ABOUT PENDING A DECISION ON THE MERITS
13 WHETHER OR NOT THE LAW WILL BE ENJOINED.

14 BUT, I MEAN, PURCHASING NEW -- EXCITING NEW MODELS
15 OF HANDGUNS WITHOUT THESE COMPONENTS IS EXACTLY WHAT
16 PLAINTIFFS ARE SEEKING TO DO. SO I THINK -- I THINK CLAIMING
17 THAT THERE WON'T BE A LOT OF PURCHASES OF A LOT OF NEW
18 HANDGUNS THAT DON'T HAVE THESE SAFETY FEATURES DOESN'T REALLY
19 RING TRUE.

20 AND, YOU KNOW, THERE MIGHT BE SOME ASPECTS OF
21 CERTAIN HANDGUNS THAT MAKE HANDGUNS SAFER, INCLUDING POSSIBLY
22 CERTAIN ASPECTS OF OFF-ROSTER HANDGUNS. THAT IS POSSIBLE.
23 BUT WE KNOW THAT THESE FEATURES CAN SAVE LIVES, ESPECIALLY OF
24 CHILDREN IN HOMES. WE KNOW THAT. THERE HAS BEEN STUDIES ON
25 THAT.

1 SO TO SAY THAT THEY ARE SIMILAR AND THEY ARE NOT
2 TALKING ABOUT BIG DIFFERENCES BETWEEN THESE HANDGUNS, THERE
3 ARE MAJOR DIFFERENCES BETWEEN THESE HANDGUNS.

4 AND IT IS A BELL YOU CAN'T UNRING BECAUSE IF -- IF
5 THE INJUNCTION IS ABLE TO TAKE EFFECT, THE HANDGUNS COULD
6 THEORETICALLY BE PURCHASED. AND THERE IS NOTHING IN THE
7 UNSAFE HANDGUN ACT THAT OUTLAWS POSSESSION OF THESE HANDGUNS
8 SO YOU CAN'T TAKE THEM AWAY FROM PEOPLE ONCE THEY ARE
9 PURCHASED.

10 SO THAT IS WHY AN INJUNCTION IS NOT APPROPRIATE HERE
11 IN TERMS OF THE PUBLIC INTEREST, WHY A STAY WOULD BE
12 APPROPRIATE, IF NECESSARY.

13 AND, PARTICULARLY, I THINK, ALSO LOOKING AT THE
14 STATUS QUO AND THE FACT THAT THIS -- THESE REQUIREMENTS HAVE
15 BEEN THE STATUS QUO FOR, YOU KNOW, SOMETHING OVER 15 YEARS AS
16 COMPARED TO THE TIMELINE WE ARE LOOKING AT BETWEEN NOW AND --
17 AND GETTING MORE INSIGHT INTO WHAT THE FINAL JUDGMENT MAY BE.

18 **THE COURT:** MANY OF THESE BANNED HANDGUNS ARE
19 ALREADY IN THE MARKET THROUGH THE EXCEPTIONS, THE FAMILIAL
20 EXCHANGE EXCEPTION AND LAW ENFORCEMENT BUYING THEM AND THEN
21 SELLING THEM. AM I CORRECT?

22 **MS. BOUTIN:** YOUR HONOR, I'M NOT -- I DON'T KNOW THE
23 NUMBERS. I CAN'T SAY IF "MANY" IS AN ACCURATE REPRESENTATION
24 OR NOT.

25 I DO KNOW, WITH RESPECT TO LAW ENFORCEMENT, THE

1 LAW -- THE EXCEPTIONS ARE DIFFERENT FOR DIFFERENT TYPES OF LAW
2 ENFORCEMENT. SO A POLICE OFFICER, PER SE, THE EXCEPTION
3 PROBABLY IS A LITTLE BIT MORE BROADLY AS FAR AS WHAT HE CAN DO
4 WITH THE HANDGUN AS OPPOSED TO OTHER TYPES OF OFFICERS THAT
5 ARE COVERED BY THE EXCEPTION. SO THEY ARE NOT UNLIMITED AS TO
6 PUBLIC SAFETY OFFICERS.

7 **THE COURT:** ALL RIGHT.

8 MR. BENBROOK, ANYTHING IN ADDITION?

9 I AM COMFORTABLE WITH THE BALANCE OF THE WINTER
10 FACTORS, SO I DON'T FEEL THE NEED FOR ANY DISCUSSION THERE. I
11 WAS REALLY FOCUSED MORE ON THE MERITS DISCUSSION.

12 **MR. BENBROOK:** YOUR HONOR, I HAVE ADDRESSED THESE
13 POINTS MULTIPLE -- IN SOME CASES MULTIPLE TIMES ALREADY, SO I
14 AM READY TO STOP TALKING.

15 **THE COURT:** ALL RIGHT.

16 **MR. BENBROOK:** AND I APPRECIATE YOUR CLOSE ATTENTION
17 TO THE PAPERS.

18 **THE COURT:** YOU ARE WELCOME. THE BRIEFING WAS
19 EXCELLENT, MUCH APPRECIATED. THESE ARE GREAT ISSUES. VERY
20 PRINCIPLED DIFFERENCES. AND, OF COURSE, THE COURT'S
21 OBLIGATION IS A NARROW ONE, NOT MAKING POLICY DETERMINATIONS
22 OR POLITICAL CONSIDERATIONS BUT SIMPLY DOING AS I AM
23 INSTRUCTED, UNDER THE LAW, AND MAKING THE BEST JUDGMENT I CAN.

24 SO I WILL TAKE EVERYTHING UNDER SUBMISSION. ISSUE
25 AN ORDER, I HOPE FAIRLY SOON. AND CONSIDER ALL OF THESE

1 VARIOUS ISSUES INCLUDING, IF AN INJUNCTION IS GRANTED, BOND
2 AND STAYS, AND ALL OF THOSE ISSUES I WILL TAKE UNDER
3 SUBMISSION.

4 THANK YOU VERY MUCH.

5 **MS. BOUTIN:** THANK YOU, YOUR HONOR.

6 **THE COURT:** HAVE A GOOD WEEKEND.

7 **MR. BENBROOK:** THANK YOU, YOUR HONOR.

8

9 * * *

10 I CERTIFY THAT THE FOREGOING IS A CORRECT
11 TRANSCRIPT FROM THE RECORD OF PROCEEDINGS
IN THE ABOVE-ENTITLED MATTER.

12 S/LEEANN PENCE 2/21/2023
13 LEEANN PENCE, OFFICIAL COURT REPORTER DATE

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1 ROB BONTA
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 2 ANTHONY R. HAKL
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 7 E-mail: Gabrielle.Boutin@doj.ca.gov
Attorneys for Defendants Rob Bonta, in his
 8 *official capacity as California Attorney*
General, and Allison Mendoza, in her official
 9 *capacity as Acting Director of the*
Department of Justice Bureau of Firearms

10 IN THE UNITED STATES DISTRICT COURT
 11 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
 12 CIVIL DIVISION
 13

14
 15 **LANA RAE RENNA et al.,**

16 Plaintiffs,

17 v.

18 **ROB BONTA, in his official capacity**
 19 **as Attorney General of California;**
 20 **and ALLISON MENDOZA, in her**
 21 **official capacity as Acting Director of**
the Department of Justice Bureau of
Firearms,

22 Defendants.

3:20-cv-02190-DMS-DEB

**DECLARATION OF GABRIELLE
 BOUTIN IN SUPPORT OF
 DEFENDANTS' APPLICATION
 PURSUANT TO FED. R. CIV. P.
 56(d)**

Date: February 10, 2023
 Time: 1:30 p.m.
 Dept: 13A (13th Floor)
 Judge: The Honorable Dana M.
 Sabraw
 Trial Date: None set
 Action Filed: 11/10/2020

1 I, Gabrielle D. Boutin, hereby declare as follows:

2 1. I am a Deputy Attorney General with the California Department of
3 Justice and serve as counsel in this action for Defendants Attorney General Rob
4 Bonta, in his official capacity, and Allison Mendoza, in her official capacity as
5 Acting Director of the Department of Justice Bureau of Firearms. I make this
6 declaration in support of Defendants' Application Pursuant to Fed. R. Civ. Proc.
7 56(d), as submitted in their Opposition to Plaintiffs' Motion For Preliminary
8 Injunction or, Alternatively, Motion for Summary Judgment. I have personal, first-
9 hand knowledge of the matters set forth below and, if called as a witness, I could
10 and would testify competently thereto.

11 2. Following the Supreme Court's issuance of its opinion in *New York State*
12 *Rifle & Pistol Association, Inc., v. Bruen*, __ U.S. __, 142 S.Ct. 2111 (2022), the
13 parties in this case stipulated to vacate the scheduling order in this case, and the
14 Court vacated the scheduling order on July 22, 2022. ECF No. 46. Since that time,
15 the parties have not discussed new case or discovery deadlines and the Court has
16 not issued a new scheduling order. To date, neither party has taken discovery from
17 the other related to the second prong in the *Bruen* analysis for Second Amendment
18 claims: whether a firearm argument is "consistent with the Nation's historical
19 tradition of firearm regulation." *Bruen*, 142 S.Ct. at 2130.

20 3. On August 22, 2022, Plaintiffs filed a Second Amended Complaint
21 adding new claims. ECF No. 49. Plaintiffs subsequently filed a motion for
22 preliminary injunction related to some of the new claims, but did not seek relief in
23 that motion with respect to their present challenge to California's Unsafe Handgun
24 Act. *See* ECF No. 53. After briefing and oral argument, Plaintiffs withdrew their
25 motion on October 10, 2022. ECF No. 63.

26 4. Plaintiffs filed their Third Amended Complaint on October 31, 2022
27 (ECF No. 67) and Defendants filed their Answer on November 14, 2022 (ECF No.
28 68).

1 4. Without advance notice to Defendants, Plaintiffs filed their currently-
2 pending Motion for Preliminary Injunction or, Alternatively, Summary Judgment
3 on December 22, 2022. ECF No. 71. Because no discovery deadlines have been in
4 place, Defendants have therefore been forced to quickly retain expert guidance and
5 perform historical research in order to attempt to fully oppose the motion.

6 5. Defendants' position is that this Court can and should deny Plaintiffs'
7 motion based on the existing record. However, if the Court believes that injunctive
8 relief or summary judgment in favor of Plaintiffs may be appropriate, Defendants
9 respectfully request three additional months to complete expert discovery on the
10 issue of analogous historical firearm regulations, followed by further merits
11 briefing. *See* Fed. R. Civ. Proc. 56(d).

12 6. As *Bruen* itself acknowledged, the historical inquiry can be complex and
13 difficult. *Bruen*, 142 S.Ct. at 2134. The research and analysis required to answer
14 the difficult historical questions posed by *Bruen* calls for a labor-intensive and
15 time-consuming process. Despite working diligently since the filing of the
16 preliminary injunction motion, there remain areas of inquiry that Defendants have
17 not yet been able to explore fully, including a deeper canvass of historical state and
18 municipal laws and additional primary-source research to further understand and
19 contextualize the Nation's traditions of firearms regulation and related regulations.

20 7. Accordingly, if the Court does not believe, based on the existing record,
21 that Plaintiff's motion should be fully denied, Plaintiffs request additional time to
22 take discovery before the Court rules on the motion.

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1 I declare under penalty of perjury under the laws of the State of California that
2 the foregoing is true and correct and that this declaration was executed on January
3 27, 2023, in Davis, California.

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5 /s/ Gabrielle D. Boutin
6 Gabrielle D. Boutin
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1 ROB BONTA
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 8 *official capacity as California Attorney*
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 9 *capacity as Acting Director of the*
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10 IN THE UNITED STATES DISTRICT COURT
 11 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
 12 CIVIL DIVISION
 13

14
 15 **LANA RAE RENNA et al.,**

16 Plaintiffs,

17 v.

18 **ROB BONTA, in his official capacity**
 19 **as Attorney General of California;**
 20 **and ALLISON MENDOZA, in her**
 21 **official capacity as Acting Director of**
 22 **the Department of Justice Bureau of**
 23 **Firearms,**

24 Defendants.

3:20-cv-02190-DMS-DEB

DECLARATION OF SALVADOR GONZALEZ IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION OR, ALTERNATIVELY, MOTION FOR SUMMARY JUDGMENT

Date: February 10, 2023
 Time: 1:30 p.m.
 Dept: 13A (13th Floor)
 Judge: The Honorable Dana M. Sabraw
 Trial Date: None set
 Action Filed: 11/10/2020

1 I, Salvador Gonzalez, declare under penalty of perjury that:

2 1. I am over the age of 18 years and competent to make this declaration,
3 which is based on my personal knowledge.

4 2. I am a Special Agent Supervisor for the California Department of Justice
5 (“CA DOJ”), Bureau of Firearms (“BOF”).

6 3. My curriculum vitae is attached hereto as **Exhibit A**. It contains a true
7 and correct description of my educational background, professional achievements,
8 and qualifications.

9 4. In May 2005, I received a Bachelor of Science degree in Criminal
10 Justice, and a Bachelor of Arts degree in Ethnic Studies, from the California State
11 University, Sacramento.

12 5. In addition, I have taken and completed multiple, formal courses on
13 weapons use, maintenance, repair, and identification. This includes completing: (a)
14 a twenty-four hour “Law Enforcement & Military Colt M16/AR-15 Rifle
15 Armorer’s Course” to safely use and maintain weapons; (b) an eight hour “Alcohol,
16 Tobacco and Firearms Privately Made Firearms Training” on the identification of
17 privately manufactured firearms; (c) a forty hour “California Peace Officer
18 Standards and Training (POST)-approved Firearms Instructor/Range Master
19 School” course; (d) an eight hour “Glock Armorer’s Course” on safe use and
20 maintenance of weapons; (e) a ten hour firearms-investigation-and-identification
21 training for law enforcement; and (f) a four hour assault-weapons-familiarization
22 course for law enforcement.

23 6. I have worked as a Special Agent Supervisor with CA DOJ for
24 approximately four years. I started working at CA DOJ approximately nine years
25 ago and approximately seven of my eight years have been at BOF. I am assigned to
26 the Division of Law Enforcement, BOF. BOF serves the people of California
27 through education, regulation, and enforcement actions regarding the manufacture,
28 sale, ownership, safety training, and transfer of firearms.

1 7. My current job responsibilities at CA DOJ BOF involve the recovery,
2 investigation, and identification of firearms. In addition, over the past eight years, I
3 have handled and fired semiautomatic handguns that are compliant with California
4 law, including, specifically, handguns that contain a chamber load indicator and a
5 magazine disconnect mechanism. Over the course of my career, I have become
6 proficient in the use and disassembly of various firearms, including the various
7 structural components of firearms, and how they work together.

8 8. For approximately the past three and a half years, I have overseen CA
9 DOJ's Roster of Certified Handguns (the "Roster") approved for manufacture or
10 sale in California, which involves determining whether handguns submitted by
11 manufacturers contain the safety features required under California law. Through
12 this process, I have become familiar with the components of numerous handguns
13 currently and previously on the Roster.

14 9. The handguns on the Roster are suitable and sufficient for the purpose of
15 self-defense. They do not lack any features that render them materially less
16 effective for self-defense than other handguns. Some manufacturers have released
17 updated models of semiautomatic pistols on the Roster that are currently ineligible
18 to be added to the Roster. However, these updated versions include only minor
19 differences and are not materially more effective for self-defense than the versions
20 on the Roster. These include, for example, the fourth and fifth generations of the
21 Glock 19 pistol (which are not on the Roster) as compared to the third generation
22 Glock 19 pistol (which is on the Roster).

23 10. Based on my experience with firearms, education, formal trainings, and
24 work at CA DOJ, I am knowledgeable about the requirements of California's
25 Unsafe Handgun Act, Penal Code §§ 31900–32110 ("UHA"), among other laws. I
26 am also able to inspect and determine whether a semiautomatic handgun complies
27 with the UHA's requirements.

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1 11. I am aware that, for a new semiautomatic pistol model to be approved to
2 CA DOJ's Roster of UHA-compliant handguns that may be sold or made in
3 California, it must undergo laboratory testing and, among other things, include a
4 chamber load indicator, a magazine disconnect mechanism, and microstamping
5 capability. Penal Code § 32010, subd. (d).

6 12. A chamber load indicator's intended function is to alert the handgun user
7 as to whether the handgun is loaded with a cartridge in the firing chamber. A
8 device qualifies as a chamber load indicator under the UHA if it is readily visible
9 and contains explanatory text and/or graphics, and is designed and intended to
10 indicate to a user from the pistol itself whether there is a cartridge in the firing
11 chamber. See Penal Code § 16380.

12 13. Chamber load indicators are an important firearm feature that increases
13 safety. By quickly and clearly informing a firearm user whether a handgun is
14 loaded, chamber load indicators help prevent accidental discharges that can result in
15 serious injury and death. Accidental discharges may occur in a variety of contexts,
16 for example, when a user cleans their firearm or when an unfamiliar user handles a
17 firearm, such as a child.

18 14. A magazine disconnect mechanism prevents the handgun from
19 discharging while a detachable magazine is removed from the handgun. A
20 mechanism qualifies as a magazine disconnect under the UHA if it prevents a
21 semiautomatic pistol that has a detachable magazine from operating to strike the
22 primer of ammunition in the firing chamber when a detachable magazine is not
23 inserted. See Penal Code § 16900. Generally, a magazine disconnect mechanism is
24 a component of the frame that looks like a small lever, which functions to impede
25 the operation of the firearm.

26 15. The purpose of a magazine disconnect mechanism is to prevent
27 accidental discharges, and the resulting risk of serious injury and death, that can
28 occur when a handgun is still loaded despite the magazine having been removed by

1 the user. Such accidental discharges can happen in a variety of contexts, such as
2 when a user is cleaning their handgun or when a child accesses and handles a
3 handgun. Magazine disconnect mechanisms are designed to increase the safety of
4 both the firearm user and people in the user's vicinity.

5 16. The absence of a chamber load indicator or a magazine disconnect
6 mechanism in a semiautomatic pistol increases the risk of accidental discharge and
7 injury to Californians from the use of these handguns. In 1991, the United States
8 General Accounting Office ("GAO") produced a report to Congress concluding:
9 "About 1 of every 3 deaths from accidental firearm discharges could be prevented
10 by a firearms safety device." See GAO Report to the Chairman, *Accidental*
11 *Shootings: Many Deaths and Injuries Caused by Firearms Could Be Prevented*
12 (March 1991), at 3, a copy of which is attached hereto as **Exhibit B**. The GAO
13 study found that 23% of deaths could have been prevented by a chamber load
14 indicator. *Id.* at 19.

15 17. I am familiar with the technology of microstamping, which utilizes lasers
16 to make precise, microscopic engravings on the internal mechanisms of a
17 semiautomatic pistol. A cartridge case holds propellant and a bullet. Upon
18 discharge of a handgun, the bullet is expelled from the barrel and the cartridge case
19 is ejected. When the pistol is fired, a unique alpha-numeric code identifying the
20 pistol's make, model, and serial number would be stamped on to the bullet's
21 cartridge case. Penal Code § 31910(b)(6); Cal. Code Regs., tit. 11, § 4049. A
22 microstamp differs from a handgun serial number, which is located on the firearm
23 itself. Microstamping assists law enforcement because a cartridge case is more
24 likely than a handgun to be left behind after a shooting, at the scene of the crime.
25 In those instances, microstamping can then help law enforcement identify the pistol
26 used in the shooting and possibly solve shooting crimes more quickly than the
27 methods that are currently used. Microstamping can thus enhance public safety
28 even if it does not enhance the safety of the handgun itself.

1 18. I am also aware that for a new semiautomatic pistol model to be
2 approved to the Roster, in addition to containing a chamber load indicator, a
3 magazine disconnect mechanism and microstamping capability, the handgun must
4 pass “firing” and “drop safety” tests. Penal Code §§ 31900, 31905, 31910, subd.
5 (b)(2) & (3). This testing must take place at a DOJ-approved lab testing facility.
6 The firing test ensures that handguns do not malfunction upon firing. The drop
7 safety test ensures that safety features prevent the handgun from discharging when
8 dropped.

9 19. I have recently reviewed data showing the number of handgun models on
10 the roster at the end of each year since the Roster was created. Since 2014, the
11 number of handguns on the Roster has consistently hovered around 800. Although
12 models go on and off the Roster throughout any given year, there have not been
13 fewer than 800 handguns on the Roster at year-end since 2017, when there were
14 785. The lowest ever year-end figure was 770 in 2016. Most recently, at the end of
15 2022, there were 829 handguns models on the Roster. Of those, 499 were
16 semiautomatic pistols, 314 were revolvers, and 16 were non-semiautomatic pistols.
17 Thirty-two of the semiautomatic pistols have both a chamber load indicator and a
18 magazine disconnect mechanism.

19 20. I am aware that, for a model of revolver or pistol to be approved to the
20 Roster it must have a safety device. Penal Code § 32010, subs. (a)(1), (b)(1). A
21 safety device functions to prevent the accidental discharge of a firearm.
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on January 26th, 2023, in Sacramento, California.


SALVADOR GONZALEZ

Exhibit A

Curriculum Vitae

Special Agent Supervisor Salvador Gonzalez
California Department of Justice
Bureau of Firearms

EDUCATION:

05/2005, Bachelor of Science Degree, Criminal Justice, California State University Sacramento.
05/2005, Bachelor of Arts Degree, Ethnic Studies, California State University Sacramento.

EMPLOYMENT:

08/2006 to 09/2014, Investigator, California (CA) Department of Motor Vehicles (DMV). I conducted criminal and administrative investigations including consumer, & licensee fraud. I provided expertise in auto theft, counterfeit documents, identity theft & performed undercover investigations. I provided technical expertise to allied agencies.

09/2014 to 07/2018, Special Agent, California Department of Justice (DOJ), Bureau of Firearms (BOF). I conducted investigations on Armed & Prohibited Persons that resulted in the seizure of weapons & the prevention of illegal firearms trafficking. I conducted firearms dealer investigations in regards to firearm law compliance or illegal firearm transactions. I provided firearm training & expertise to allied agencies. I enforced regulations regarding the manufacture, sale, ownership & transfer of firearms and various violations occurring at California gun shows.

07/2018 to 8/2019, Special Agent, California Department of Justice (DOJ), Bureau of Gambling Control (BGC). I conducted investigations regarding gambling crimes in the state of California. I conducted investigations in California cardrooms and casinos involving money laundering, drugs, illegal bookmaking, and other illegal gambling activities.

8/2019 to present, Special Agent Supervisor, California Department of Justice (DOJ), Bureau of Firearms (BOF). In my career I have attended at least 15 gun shows and have become familiar with current laws pertaining to the sales of firearms in the State of California. The California Department of Justice, Bureau of Firearms, maintains the State Assault Weapon Registry. If a person with registered assault weapons or other firearms becomes prohibited from possessing firearms I have been assigned to recover the firearms. Special Agents within the CA DOJ BOF are frequently assigned to give assault weapons training to other law enforcement agencies and to help assist in identifying such firearms.

TRAINING:

On 08/7/2006, I completed an excess of 640 hours of Peace Officer Standards and Training (POST) at a recognized Basic Specialized Investigator Academy at the Golden West College in Huntington Beach, CA.

On 09/25/2014, I attended an assault weapons familiarization training class for law enforcement and I received four (4) hours of formal training on firearms / assault weapons. I have also received formal and informal training from other experienced BOF agents regarding firearms violations.

On 02/25/2016, I attended a firearms investigation and identification training class for law enforcement and I received ten (10) hours of formal training on firearms / assault weapons.

On 08/31/2016, I attended the California Department of Justice Advanced Training Center Submachine Gun Operator Course and I received twenty-four (24) hours of formal training on the proper use and deployment of a submachine gun.

On 11/29/2018, I attended the Glock Armorer's Course and I received eight (8) hours of formal training on how to safely use and maintain your weapon.

On 09/20/2019, I completed a 40 hour California Peace Officer Standards and Training (POST) approved Firearms Instructor/Range Master School. This class was offered by the American River College/Los Rios Community College District.

On 10/22/2019, I attended the Alcohol Tobacco and Firearms Crime Gun Seminar and I received four (4) hours of training on the successful use of the National Integrated Ballistic Information Network (NIBN).

On 12/18/2019, I attended the National Center for Biomedical Research and Training Academy of Counter-terrorist Education Course for Law Enforcement Active Shooter Emergency Response Performance Level and I received twenty-four (24) hours of training on the successful use of active shooter emergency response.

On 12/19/2019, I attended the National Center for Biomedical Research and Training Academy of Counter-terrorist Education Course for Law Enforcement Active Shooter Emergency Response Performance Level Train-the-Trainer and I received eight (8) hours of training in order to train officers on active shooter emergency response.

On 08/19/2020, I attended the California Department of Justice Advanced Training Center Less Lethal Munitions User's Course and I received four (4) hours of formal training on the proper use and deployment of a less lethal munition.

On 08/19/2020, I attended the California Department of Justice Advanced Training Center Distraction Device User's Course and I received four (4) hours of formal training on the proper use and deployment of a distraction device.

On 6/16/2021, I attended the Alcohol Tobacco and Firearms Privately Made Firearms Training and I received eight (8) hours of training on the identification of a privately made firearm (PMF).

On 11/2/2021, I attended the Law Enforcement & Military Colt M16 / AR-15 Rifle Armorer's Course and I received twenty-four (24) hours of formal training on how to safely use and maintain your weapon. This class was offered by Colt.

On 7/13/2022, I attended the Benelli M1, 2 & 4 Series Armorer's Course and I received eight (8) hours of formal training on how to safely use and maintain your weapon. This class was offered by the Team One Network.

During the course of my career I have become semi-proficient in the use and disassembly of various revolvers, semi-automatic pistols, submachine guns, shotguns, and various rifles. I have made or assisted in the arrest of at least 100 persons for violations involving illegal weapons possession. In the course of my employment I have participated in an excess of 35 search warrants which involved the illegal possession of firearms. I have conducted over 10 presentations and training courses based on privately made firearms, silencers, assault weapons and firearm familiarization, which help grasp the California Penal Code as it pertains to firearms. These presentations and trainings have been presented to several California Department of Justice Special Agents, Federal and State Allied Agencies, District Attorneys, Property Technicians and California Department of Justice Deputy Attorney Generals.

Exhibit B

GAO

Report to the Chairman, Subcommittee
on Antitrust, Monopolies, and Business
Rights, Committee on the Judiciary,
U.S. Senate

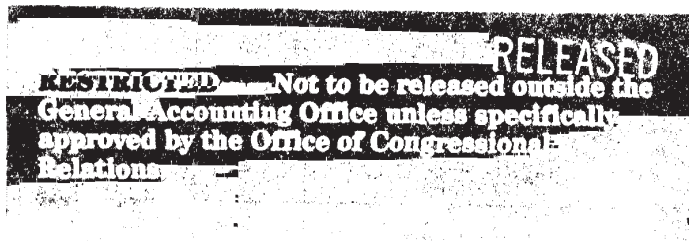
March 1991

ACCIDENTAL SHOOTINGS

Many Deaths and Injuries Caused by Firearms Could Be Prevented



143619



GAO/PEMD-91-9



United States
General Accounting Office
Washington, D.C. 20548

**Program Evaluation and
Methodology Division**

B-240648.2

March 19, 1991

The Honorable Howard Metzenbaum
Chairman, Subcommittee on Antitrust, Monopolies,
and Business Rights
Committee on the Judiciary
United States Senate

Dear Mr. Chairman:

At your request, we examined the extent to which certain safety devices could prevent firearms-related deaths. Specifically, we examined the proportion of accidental deaths that might have been averted by two technological modifications to firearms: a child-proof safety device that automatically engages and a device that indicates whether a gun is loaded. We also looked at injuries caused by accidental firearm discharges, for which we developed new information.

This report presents the findings of our research, which shows that the two safety devices could potentially save many lives and would undoubtedly also prevent many injuries. We also present information on the likely number of individuals injured in accidental shootings and discuss a range of alternatives for dealing with this public health problem.

As we arranged with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from its date. At that time, copies of the report will be sent to the Chairman of the Consumer Product Safety Commission, and we will make copies available to others upon request.

If you have any questions or would like additional information, please call me at (202) 275-1854 or Robert York, Acting Director of Program Evaluation in Human Services Areas, at (202) 275-5885. Other major contributors to this report are listed in appendix IV.

Sincerely yours,

A handwritten signature in cursive script that reads 'Eleanor Chelimsky'.

Eleanor Chelimsky
Assistant Comptroller General

Executive Summary

Purpose

In 1988, some 1,501 people were killed in the United States by accidental discharges of firearms, and many more were injured. Among those killed were 277 children under age 15.

Concerned about these accidental shootings, the Chairman of the Subcommittee on Antitrust, Monopolies, and Business Rights of the Senate Committee on the Judiciary asked GAO to examine the extent to which certain safety devices could prevent such deaths or injuries. Specifically, GAO was asked to examine the proportion of accidental firearms fatalities that might have been prevented by two types of technological modifications to firearms: a child-proof safety device that automatically engages and a device that indicates whether a gun is loaded. GAO also examined nonfatal injuries, in an effort to establish the totality and costs of deaths and injuries from accidental firearm discharges as well as the relative size of fatal accidents vis-a-vis that totality.

Background

The debate over firearms policy receives nationwide attention on a continuing basis, but only rarely has that debate focused on firearms as consumer products. Nonetheless, one recommendation that has been made is that guns be treated like other consumer products. Some have proposed making guns safer so as to reduce the number of accidental firearm discharges resulting in injuries and deaths. This proposal is in line with efforts aimed at improving the safety of a variety of consumer products implicated in accidental injuries and deaths. However, the Consumer Product Safety Commission, the primary federal agency with responsibility for product safety, is not allowed to take action that will restrict the manufacture or sale of firearms. No other agency is explicitly charged with monitoring firearms safety.

Firearms are the fourth leading cause of accidental deaths among children 5 to 14 years old and the third leading cause of accidental deaths among 15- to 24-year-olds. Across all age groups, accidental shootings are the sixth leading cause of potential years of life lost because of accidents.

Results in Brief

From a nationally projectable sample, GAO estimates that 31 percent of accidental deaths caused by firearms might be prevented by the addition of two safety devices. Of the 107 accidental firearms-related fatalities GAO examined for calendar years 1988 and 1989, 8 percent could have been prevented had the firearms been equipped with a child-proof safety device. (This 8 percent represents instances in which children

Executive Summary

under the age of 6 accidentally shot and killed themselves or other persons.) In an additional 23 percent of the cases, people accidentally shot and killed themselves or others with firearms they thought were unloaded. These deaths could have been prevented by a loading indicator.

Although it has long been assumed that far more injuries than deaths occur from accidental discharges of firearms, no information has been available on the actual number of injuries. GAO examined data on accidental shootings in 10 cities and found that in 1988 and 1989, these areas had a ratio of 105 injuries for each death (that is, more than 100 to 1). Although this estimate, based on a judgmental sample, cannot be generalized to the country as a whole, it is nevertheless reasonable to infer from it that the number of accidental injuries from firearms nationwide is substantial and far exceeds the number of fatalities.

GAO's Analysis

Prevention of Accidental Deaths and Injuries

About 1 of every 3 deaths from accidental firearm discharges could be prevented by a firearms safety device. From data in autopsy and police reports, GAO determined the numbers of accidental firearm deaths in 1988 and 1989 that (1) could have been prevented and (2) could not have been prevented by either of the two safety devices studied. GAO examined 107 total deaths from accidental firearm discharges. In that sample of fatalities, 34 could have been prevented by safety devices; 52 could not have been. Not enough data were available to determine whether the other 21 were preventable.

A child-proof safety device (that is, one that prevents the trigger from accidentally being engaged) could have prevented all the accidents in which children under the age of 6 killed themselves or others (8 percent of the total). However, according to experts in pediatric injuries, including experts with research experience in firearms, a child-proof safety device on a firearm (whether based on the child's strength, cognitive skills, or both) could reliably be expected to deter only children under the age of 6.

A safety device that indicates whether a firearm is loaded could have prevented another 23 percent of the deaths. Many accidental deaths

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caused by firearms, other than those affecting children, involve uncertainty about whether the weapon is loaded. For example, one might empty a firearm but not notice that a round remains in the chamber, one might typically leave a weapon unloaded and so assume that it is always unloaded, or one might pull the trigger several times without discharge (dry-firing) and so assume the chamber to be empty even though it is not.

Other accidental deaths GAO examined were not considered preventable by these devices. For example, death can be caused by a gun that discharges when it is accidentally dropped or falls from its storage location or by a hunter mistakenly believing he or she is shooting at game.

From our sample, we can project that about 458 (plus or minus 89) of the 1,501 deaths in 1988 could have been prevented by either a child-proof device or a loading indicator device. In addition to the lives that could be saved, there are medical expenses and other economic costs to society that would not occur were these deaths to be prevented. Averting 458 deaths would avoid costs estimated to exceed \$170 million.

Deaths and Injuries

According to statistics maintained by the National Center for Health Statistics, the number of deaths annually caused by accidental firearm discharges has generally been decreasing, ranging from 1,955 deaths in 1980 to 1,501 deaths in 1988. This is a decline of 23 percent over 8 years. However, no national data have been maintained on the number of injuries caused by accidental firearm discharges. In fact, few police departments maintain records on injuries caused by firearms. GAO identified 10 cities whose police departments maintain such data. These cities had populations ranging from about 93,000 to over 1 million.

The police data GAO examined showed that there were 527 injuries and 5 deaths from accidental shootings in 1988 and 1989. Thus, across these 10 cities, the ratio of nonfatalities to fatalities was about 105 to 1.

An estimate of the overall costs associated with unintentional firearm injuries and deaths can be derived by combining the incidence data with information on the cost of injuries. If there were 1,500 deaths and some 12,000 hospitalizations (less than one tenth the number of injuries estimated from our sample) from accidental shootings every year, that would translate into an estimated lifetime cost, each year, of close to \$1 billion.

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Recommendation

The number of individuals being injured and killed each year in accidental shootings is substantial. GAO has determined that two technologies—child-proof safeties and loading indicators—show promise for reducing the number of deaths and injuries. However, obstacles remain to realizing this promise and, in addition, other approaches (for example, training gun owners or limiting access to firearms) may be equally or more effective.

The human, economic, and public health costs of these shootings to the victims, their families, and society are considerable. The magnitude of the problem requires that all possible efforts be made to reduce the number of accidental shootings.

The Consumer Product Safety Commission, the primary federal agency with responsibility for product safety, is currently not allowed to take any action that might restrict the availability of firearms to the consumer. GAO recommends that the Consumer Product Safety Act be amended to clearly establish that the Consumer Product Safety Commission can regulate the risk of injury associated with firearms.

Agency Comments

GAO did not request comments on a draft of this report.

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Abbreviation

GAO General Accounting Office

Introduction

A 4-year-old boy shoots his 2-year-old brother with the .22-caliber pistol he finds under the seat of his father's pickup truck. A 10-year-old finds a .38-caliber revolver in a dresser drawer. He does not think it is loaded and accidentally kills his 8-year-old sister while playing with the gun.

These and similar incidents highlight an issue of concern: accidental injuries and deaths from firearms. Currently in the United States, about 1,500 people die each year from accidental shootings, and an unknown number of people are injured. Firearms are the fourth leading cause of accidental deaths among children 5 to 14 years old and the third leading cause of accidental deaths among 15- to 24-year-olds. Across all age groups, accidental shootings are the sixth leading cause of potential years of life lost from accidents.¹ Some 277 children under age 15 were killed in accidental shootings in 1988.

The Chairman of the Subcommittee on Antitrust, Monopolies, and Business Rights of the Senate Committee on the Judiciary requested that we undertake a study to try to estimate the number of deaths and injuries that might be prevented by two possible technological modifications to firearms: child-proof safeties that would automatically engage and loading indicators that would show when a live round was in the chamber, ready to be fired.

In response to this request, we conducted a study to examine the magnitude of the problem of unintentional firearms injuries and to estimate the effect of the two proposed technological modifications in preventing such accidents.

Background

The debate over firearms policy receives nationwide attention on a continuing basis. Most of this debate has focused on issues of gun ownership, such as waiting periods for purchase, background checks, gun licensing, and banning certain types of weapons. These issues generally focus on problems with the illegal use of firearms versus rights of gun ownership for protection and recreation.

Absent from most of the gun control debate is a discussion of firearms as consumer products. One recommendation that some researchers in public health have made is that guns be treated like other consumer products. That is, they propose that steps be taken to make guns safer

¹The standard method of calculating potential years of life lost is to subtract the age at death of the accident victim from age 65.

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to at least reduce the number of injuries and deaths resulting from the accidental discharge of firearms. This proposal is in line with efforts aimed at improving the safety of a variety of consumer products implicated in accidental injuries and deaths, including automobiles, toys, and poisonous substances. The federal government has increasingly played a role in mandating changes to products to improve their safety. However, the Consumer Product Safety Commission, the primary federal agency with responsibility for product safety, is not allowed to take action that will restrict the availability of firearms to the consumer. No other agency has been charged with monitoring the public health risks firearms may entail.

This report looks at the probable effects of two specific suggestions from the public health literature for improving the safety of firearms: child-proof safeties and loading indicators.

Accidental Shootings

As mentioned above, shootings are among the leading causes of accidental deaths, particularly among young people. It should be noted that accidental shooting deaths represent only a small proportion of the total number of people injured and killed by firearms each year. The majority of deaths from firearms (56 percent) are suicides, with homicides accounting for most of the remainder (39 percent). Only 5 percent of firearms-related deaths each year are caused by accidental shootings.

Nonetheless, the number accidentally injured or killed by firearms may represent a substantial number of cases. While data on the number of fatalities are available, there is little information on the number of injuries caused by accidental shootings. And, despite attention to the issue of firearm accidents by public health researchers, there is little in the way of empirical evidence on the circumstances of accidents involving firearms, so not much is known about the details of those shootings.

National data are available on the number of deaths caused by unintentional shootings. The National Center for Health Statistics annually collects national data for all causes of death. Numbers for the years 1980-88 are shown in table 1.1. No comparable information is available for nonfatal injuries.

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Table 1.1: Unintentional Firearm Deaths and Injuries 1980-88

	1980	1981	1982	1983	1984	1985	1986	1987	1988
Deaths	1,955	1,871	1,756	1,695	1,668	1,649	1,452	1,440	1,501
Nonfatal injuries	NA	NA	NA	NA	NA	NA	NA	NA	NA

As can be seen, there was a generally downward trend in the number of deaths each year until 1987, with an increase in 1988, the most recent year for which information is available. We do not know why the number of deaths has declined, but there are several possible explanations. Education in gun safety and public awareness campaigns may be having some effect. There may be fewer deaths because gun owners are taking more precautions in storing and handling their weapons. There may also be a greater general awareness of the dangers associated with firearms, so individuals refrain from handling unfamiliar weapons. The many products entering the market for securing firearms may also be having an effect. Many devices are available for storing guns or protecting them from unauthorized users. Another possible explanation is that more shooting victims may be surviving their injuries because of better trauma care and better access to care. Any or all of these influences may be working to bring down the number of fatalities.

Objectives, Scope, and Methodology

The central objective of this project was to provide an estimate of the proportion of firearms accidents that might be prevented by the addition of a child-proof safety or a loading indicator. This issue divides into two questions:

- What proportion of firearm accidents might have been prevented with a child-proof safety?
- What proportion of accidents might have been prevented with a loading indicator?

A second objective of our research was to add to the base of knowledge on firearm accidents, particularly by contributing information on the number of injuries. No national estimates are available on accidental injuries from firearms. As a result, there is no clear understanding of (1) the universe of accidents, both fatal and nonfatal, annually caused by firearms; (2) the relative importance of fatal accidents in terms of that universe (that is, it is not known if the deaths in any given year represent 5 percent of the accidental shootings or 50 percent); and (3) the costs represented by this unknown universe of deaths and injuries.

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The scope of our work was limited to unintentional injuries and deaths from firearms. This eliminates the vast majority of gunshot injuries, specifically those related to any types of criminal activity or suicide attempt. Similarly, we limited the scope of “preventable” shootings to those that could have been averted by means of a child-proof safety or a loading indicator. We collected data for 1988 and 1989, the most recent years for which complete data were available at the time of our research.

For our examination of preventability, we looked at cases in which there had been a death as a result of an accidental firearm discharge. We collected data from a nationally representative sample of jurisdictions. This allowed us to develop a statistically valid estimate of the proportion of deaths preventable with a child-proof safety or loading indicator.

We determined if there were any deaths from accidental shootings in 1988 or 1989 by contacting state vital records offices and the coroners or medical examiners in the selected jurisdictions. The determination of whether a particular shooting might have been prevented by a child-proof safety or a loading indicator required detailed information about the particular incident. Generally, this meant that we needed information on the shooter, the weapon, and the circumstances of the accident.

By limiting the cases to fatalities, we could contact coroners or medical examiners in the selected jurisdictions to obtain the needed information. Information from these files for deaths was sufficiently detailed in about 80 percent of the cases to allow a determination of preventability.

We limited this examination of preventability to fatal shootings primarily because less information is maintained on accidental injuries than on deaths. In our preliminary investigation, we learned that the information we needed to make a determination of preventability was very often not available in cases in which there was only an injury and no death. In fact, in many instances, it might not be possible to locate any information about a nonfatal accident.

We learned that many police departments do not maintain retrievable records on accidental shootings (since these are not crimes), and even when they do, they document more completely the incidents in which a shooting victim died. Even in deaths believed from the outset to be accidental, the homicide unit is often involved in the investigation. Additionally, details of the circumstances surrounding accidental deaths are

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usually available from coroners' and medical examiners' reports. In contrast, information from the case records of injuries we examined was rarely sufficient to allow us to determine preventability. Consequently, we restricted our preventability determinations to cases involving accidental deaths.

We did examine accidents involving nonfatal injuries in order to develop some information about the frequency of such accidents and to explore the relative proportion of injuries to deaths. Our examination of these accidents is based on data drawn from 10 cities. The lack of data in many police departments for such accidental shootings limited our study. We identified 10 urban police departments that maintained accessible records on accidental firearm injuries and were willing to provide the case file information. Police departments that were included in our study were for the following cities: Tucson, Arizona; San Jose, California; Denver, Colorado; Atlanta, Georgia; Louisville, Kentucky; St. Paul, Minnesota; Albuquerque, New Mexico; Columbia, South Carolina; Dallas, Texas; and Salt Lake City, Utah. Because this was a convenience sample of departments, the results from these 10 cities cannot be generalized to the country as a whole.

A more detailed discussion of the scope and methodology we used is provided in the chapters covering each part of the work. The sampling plan is discussed in detail in appendix I.

It should be noted that we did not investigate the specifics of design modifications to firearms to make them child-proof or to indicate whether they were loaded. We learned that various devices exist and are available on some firearms, but we did not examine the difficulty or cost associated with providing such devices on all firearms. We have examined the potential effectiveness of such devices in preventing accidental shooting deaths on the assumption that all firearms would be equipped with them. We comment further on this in chapter 4.

As requested by the subcommittee, we did not request comments on our report from any federal agency. Our work was performed in accordance with generally accepted government auditing standards.

Study Strengths and Limitations

There is very little specific information currently available about the details and circumstances surrounding accidental shootings. In particular, there is little known about nonfatal shootings. One strength of this study is that it adds to the knowledge on this topic.

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A second strength is the method we used for our examination of preventability. Because we collected data from a nationally representative sample of jurisdictions, we have developed a valid estimate of the proportion of deaths preventable nationwide by means of a child-proof safety or a loading indicator. In carrying out this study, we went to great lengths to obtain information on the accidental shootings in our sample, contacting coroners and medical examiners and, when necessary, seeking additional information from police records.

We have attempted to make the most conservative choices in our assumptions. For example, in considering at what age a child-proof safety might be effective in consistently preventing a child from firing a weapon, we chose the youngest age proposed by any expert in the area. Undoubtedly, some older children would also be prevented from firing weapons equipped with such devices, but we have only counted children under 6 in our calculations of preventability.

The limitations to our investigation relate primarily to our examination of the proportion of firearm accidents resulting in injuries. Because we had to rely solely upon police department records for this information, there are potential gaps in the data. As is usual in the United States, each police department has its own recordkeeping system, with accidental shootings filed under different categories in different departments. In some instances, the department retrieved the records for us from computerized files, while in other instances we had to conduct a hand search of all records filed under some broader heading. These different recordkeeping systems may account for some variability in the number of cases identified in the different cities. But any bias must necessarily be in the conservative direction (that is, the numbers can only underreport the actual totals), because all the cases we report were of identifiable accidental shootings.

An additional limitation is that we could not evaluate all possible alternatives for reducing firearm accidents; we could evaluate only the potential effectiveness of child-proof safeties and loading indicators. We discuss other possible approaches in chapter 4.

It should be noted that most of these limitations are merely reflections of immaturity in this area of research. This is also true of other areas in which police data and uncounted or hidden populations are involved and for which no national monitoring agency responsibility exists.

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Organization of the Report

In chapter 2, we address the question of firearm accidents that could be prevented by child-proof safeties and loading indicators. Our research on nonfatal injuries from firearm accidents is discussed in chapter 3, and we discuss the implications of our findings in chapter 4. The sampling plan and estimation methodology are provided in appendix I. Appendix II contains a discussion of the costs of firearm injuries. Suggested legislative language for implementing our recommendation is provided in appendix III. Major contributors to the report are listed in appendix IV.

The Preventability of Accidental Deaths From Firearms

In this chapter, we report on our estimate of the proportion of all accidental firearm deaths that could be prevented by either a child-proof safety device or a device that indicates whether a gun is loaded. We first describe the methodology we used to determine which deaths could have been prevented. Next, we provide our findings on the numbers of accident cases in our sample that were preventable by a child-proof safety or loading indicator and the accidents that were not thereby preventable. We include a description of some of the characteristics of the accidents in our sample and conclude with estimates of preventable deaths nationwide.

Methodology

To determine the percentage of accidental deaths from firearms that could have been prevented by either of the two types of devices, we examined data from medical examiners and coroners in a sample of jurisdictions from across the United States. We randomly selected 110 urban and rural jurisdictions (counties and independent cities) and determined if there had been any deaths in the jurisdictions from accidental shootings in 1988 or 1989, the most recent years for which data were available. To determine if there were any such deaths, we contacted state vital records offices and the coroners or medical examiners in the selected jurisdictions.

We requested complete case file information (investigation reports, autopsy results, and so on) from the medical examiner or coroner for every accidental death from firearms that we identified. In some cases, when medical examiners' or coroners' data were insufficient to allow a preventability determination, we sought supplemental information from police department records. In total, we reviewed 107 case files.

After our review of case files, we divided the accidental firearm deaths into four categories: (1) those that could have been prevented by a child-proof safety device, (2) those that could have been prevented by a loading indicator device, (3) those that could not have been prevented, and (4) those for which a preventability determination could not be made.

We constructed criteria for determining which cases fell into each category. For deciding which accidents could have been prevented by a child-proof safety device, we sought the advice of experts. Several types of child-proof devices are on the market. Through various means, such devices lock the trigger to prevent it from being pulled. According to pediatrics experts and experts on deaths and injuries from firearms, a

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The Preventability of Accidental Deaths
From Firearms

child-proof device can be reasonably expected to prevent only children up to about age 6 from discharging a firearm. Children under that age are not considered strong enough physically or developed enough cognitively to be able to disengage a safety mechanism designed to be child-proof. Therefore, our criterion for determining the number of deaths that could have been prevented by a child-proof device was the age of the child firing the weapon.

Loading indicators allow one to determine at a glance whether a firearm is unloaded and whether a round remains in the chamber. Our criterion for determining the number of deaths that could have been prevented by a loading indicator was that there was evidence that the shooter believed the weapon was unloaded. We required that there be evidence of one of three situations in the case file. First, the shooter believed the firearm to be unloaded because either the shooter had emptied the firearm but failed to note that a round remained in the chamber or the shooter's common practice was to leave the weapon unloaded and so assumed it to be. Second, the shooter pulled the trigger several times without the firearm discharging (dry-firing) and so assumed it to be unloaded. Or third, the firearm had been stored for over a month, so the shooter did not remember whether it was loaded but assumed it was not.

We judged an accidental firearm death to be nonpreventable in cases in which there was specific evidence that the conditions above for child-proof safeties and loading indicators were not met (that is, shooter over age 6, shooter knew weapon was loaded). Examples of nonpreventable accidents (that is, not preventable by either of these two devices) included cases in which a weapon fell or was knocked to the ground and consequently discharged. Hunting accidents in which victims were mistakenly shot (for example, the 18-year-old man who was shot by a friend who mistook him for a deer) were also considered nonpreventable.

We classified as "undeterminable" any death for which the case file lacked sufficient detail to enable a determination of preventability. These included self-inflicted shootings in which there was no way of determining whether the victim had checked the gun before firing it.

For addressing the question of how many accidental shootings might have been prevented by the two safety devices, we examined accidental deaths from firearms, rather than injuries, primarily because more information is maintained on accidental deaths than on injuries. For example, police departments document more completely incidents in

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The Preventability of Accidental Deaths
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which a shooting victim died. Even in deaths believed from the outset to be accidental, the homicide unit is often involved in the investigation. Additionally, details of the circumstances surrounding accidental deaths are usually available from coroners' and medical examiners' reports. Information from such sources was often sufficiently detailed to allow a determination of preventability. In contrast, information from the case records of injuries we examined was rarely sufficient to allow us to determine preventability. Consequently, we restricted our preventability determinations to cases involving accidental deaths.

Findings

Child-Proof Safety Devices

Of the 107 deaths we reviewed, 9 (8 percent) resulted from shots fired by children under age 6. These deaths could have been prevented by a child-proof safety device. Although children under the age of 6 generally cannot disengage a child-proof device, they are quite capable of firing a handgun, as demonstrated by medical examiners' and coroners' reports. In one case, for example, a 1-1/2-year-old boy and his 3-1/2-year-old brother were playing with a .38 caliber handgun that they found under their father's pillow. The weapon discharged, striking the younger child and killing him.

Loading Indicator Devices

Of the 107 deaths, 25 (23 percent) could have been prevented had the firearm had a loading indicator. These deaths occurred when the shooter, typically a male between 13 and 24 years old, believed for one reason or another that the firearm was unloaded. In one case, a 15-year-old boy removed a .22 caliber handgun from his father's nightstand and pointed it playfully at his 11-year-old sister. He had already removed the clip, for he was familiar with the gun (having fired it at the range once before), and thus believed the gun was unloaded. However, he did not realize that a round remained in the firing chamber; upon discharge, it struck his sister in the head.

Other deaths occurred when the shooter dry-fired a weapon one or more times and so believed it to be unloaded. In one case, a 17-year-old boy took a large-caliber handgun he believed to be unloaded and, in the presence of two friends, put it in his mouth. He pulled the trigger and, when the weapon failed to discharge, he placed it to his head and again pulled the trigger. The weapon then discharged.

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In still other cases, the shooter habitually unloaded a firearm before storing it and so assumed it to be unloaded. For example, one man was cleaning his .44 caliber handgun that he always kept unloaded, but he had forgotten that he had placed a loose round in the chamber 2 weeks earlier. When he cocked the hammer to clean it, he inadvertently touched the trigger. The bullet struck his wife in the chest.

Other Accidents

In 52 (49 percent) of the 107 cases we examined, the accident involved neither a child under the age of 6 nor a firearm believed to be empty. These deaths largely include those that occurred because a weapon discharged when it fell or was knocked to the ground. For example, in one case, a hunter was jumping into the back of a pickup truck when his rifle knocked against the truck bed and discharged. The bullet entered the cab of the truck, killing a passenger.

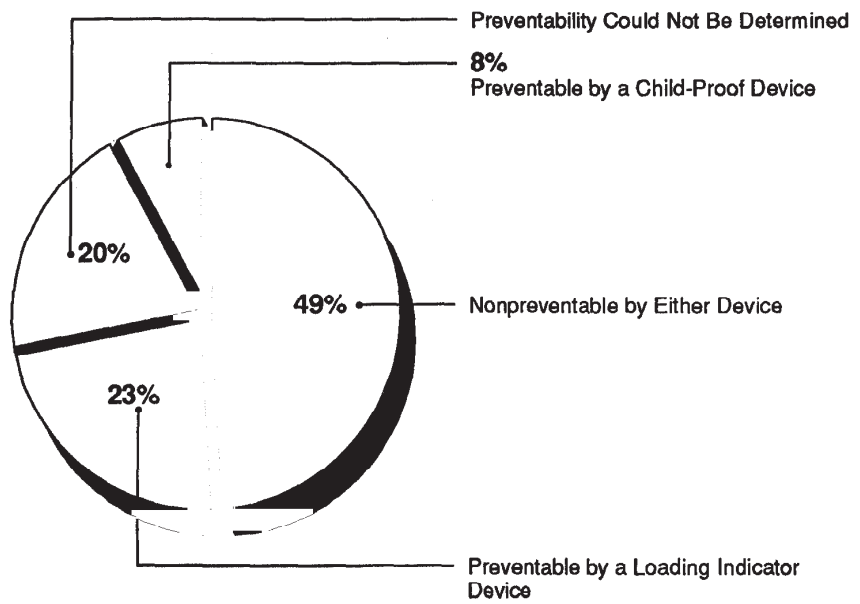
Although we classified such cases as “nonpreventable” by a loading indicator, we believe that some clearly would have been prevented had the shooter (1) been more careful in handling the weapon, (2) not been intoxicated, or (3) received training in firearm handling. We used gun safety materials published by the National Rifle Association to develop statements of basic safety practices. Among the 107 cases we examined, 90 involved clear violations of good gun-handling practices. For example, 7 cases involved intoxication or some use of alcohol and 10 cases involved Russian roulette.

In 21 (20 percent) of the 107 cases we examined, the case file information was insufficient to enable us to determine preventability. In one case, a 42-year-old male was admitted to a hospital with a gunshot wound in the abdomen. The case file indicated only that the wound was self-inflicted and occurred as the victim was reportedly putting the gun in a holster. It did not contain information on whether the victim thought the firearm was unloaded. Undoubtedly, some unknown proportion of these cases also could have been prevented by the presence of a loading indicator.

Figure 2.1 shows, for the 107 accidental deaths we reviewed, those that could have been prevented, those that could not have been prevented by either a child safety or loading indicator device, and those for which a preventability determination could not be made.

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From Firearms**

Figure 2.1: Proportion of Preventable to Other Deaths Caused by Accidental Firearm Discharges*



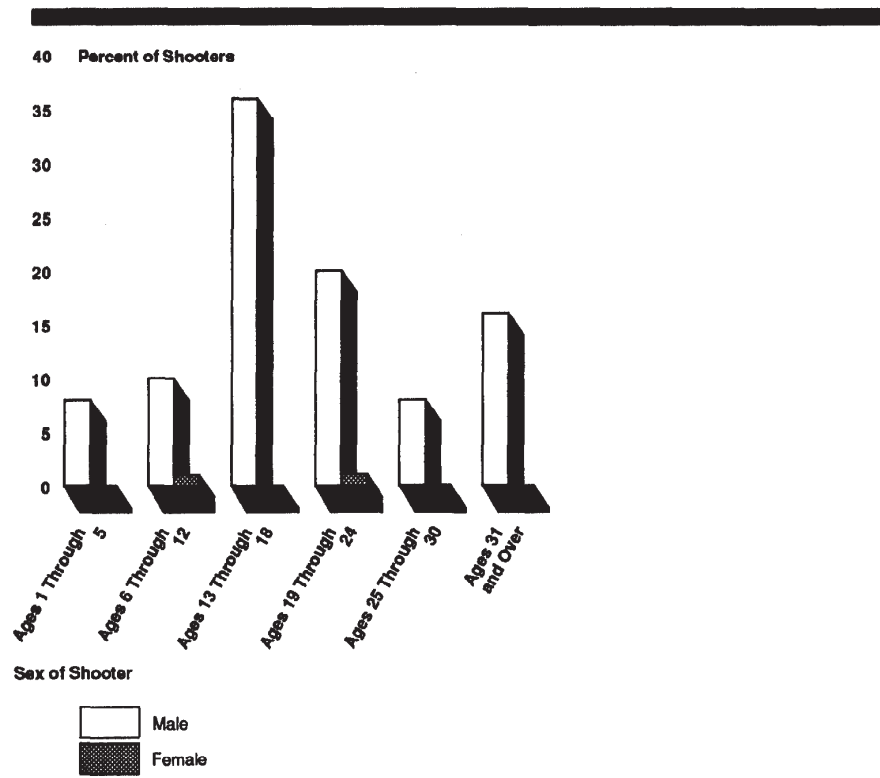
*From our sample of 107 cases, calendar years 1988 and 1989.

**Characteristics of
Accidental Deaths
From Firearms**

In the course of our review, we observed several interesting characteristics about accidental deaths from firearms. (Figures 2.2 through 2.6 show selected characteristics of the case files we reviewed.) As shown in figure 2.2, many more shooters were male than were female, and more shooters were between the ages of 13 and 24 than in other age groups.

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Figure 2.2: Sex and Age Group of Shooters*

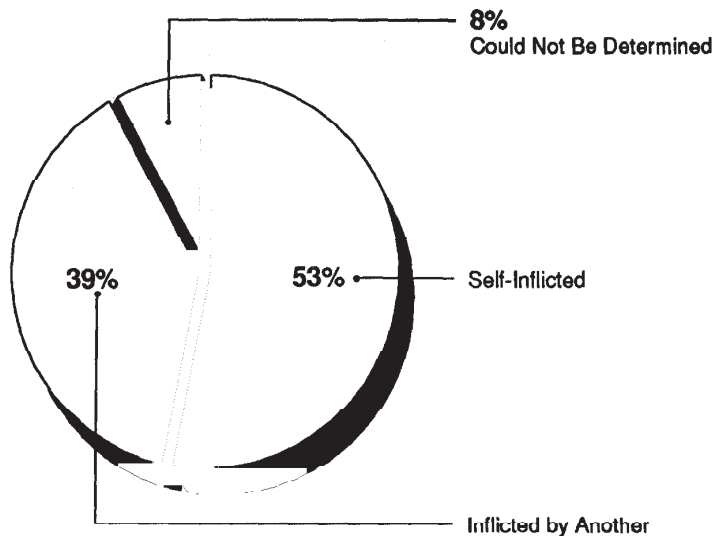


*Based on 86 case files that included both sex and age.

Slightly more than half the deaths were from self-inflicted wounds, as shown in figure 2.3.

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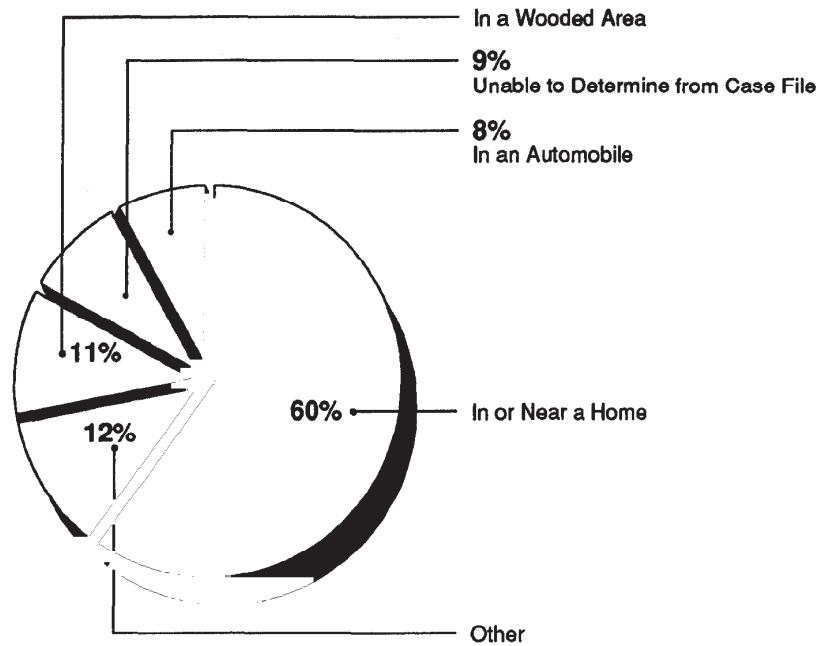
Figure 2.3: Percent of Accidental Deaths That Were Self-Inflicted



More deaths occurred in or near a private residence than in vehicles, parks, or streets, as shown in figure 2.4.

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Figure 2.4: Location of Firearm Accidents Resulting in Death^a

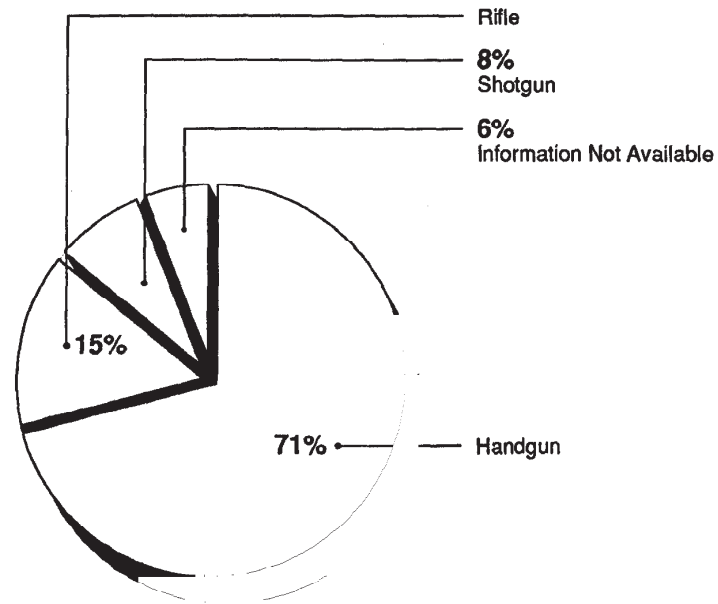


^a“Other” includes public streets, sidewalks, alleys, public parks, workplaces, and firing ranges.

A handgun was the weapon involved in the majority of deaths, as shown in figure 2.5.

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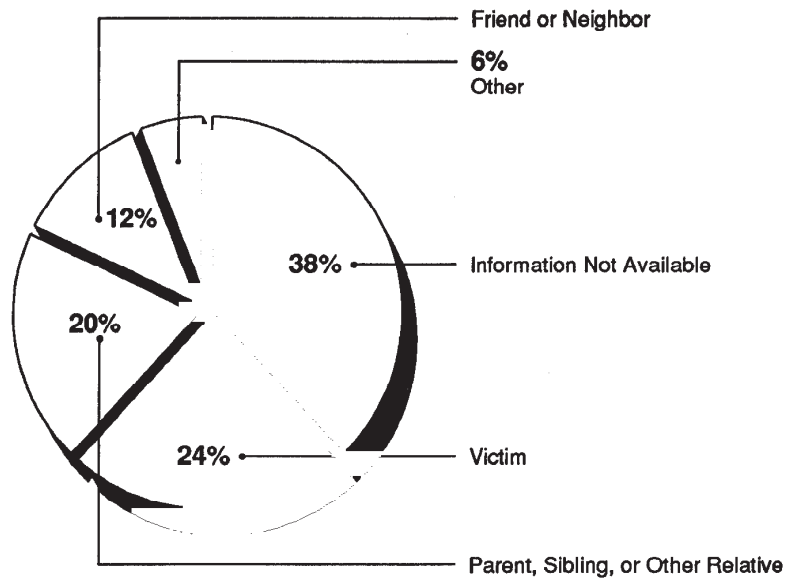
Figure 2.5: Type of Weapon Involved in Accidents



And over 4 out of 10 victims died by their own (or their family's) firearm, as shown in figure 2.6.

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Figure 2.6: Ownership of Weapons Involved in Accidents



Estimates of Preventable Deaths

Nationwide, in 1988, according to the National Center for Health Statistics, 1,501 deaths resulted from accidental firearm discharges. From our sample, we can project that about 458 (plus or minus 89) of these deaths could have been prevented by either a child-proof device or a loading indicator device.¹ Specifically, 113 (plus or minus 64) could have been prevented with a child-proof device, and 345 (plus or minus 99) with a loading indicator device. Of the remaining deaths, 767 (plus or minus 125) could not have been prevented with these devices. Although we can project that over 400 deaths could have been prevented with these devices, it is likely that many additional deaths could have been prevented had good gun-handling practices been exercised, such as locking up and storing firearms unloaded and refraining from horseplay and the use of alcohol when handling firearms.

In addition to the lives that could be saved, there are medical expenses and other economic costs to society that could be avoided were these deaths to be prevented. The costs associated with shootings are quite

¹Because our sample was randomly selected, our results are projectable to the country as a whole. All samples, however, are subject to sampling errors, which define the upper and lower bounds of the estimate calculated. All sampling errors for the estimates in this chapter were calculated at the 95-percent confidence level. (See appendix I for the sampling plan and the error for each estimate.)

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high. If 458 deaths were averted, this would avoid costs estimated to exceed \$170 million. (See appendix II for further discussion of the costs of firearm injuries and deaths.)

Accidental Injuries and Deaths From Firearms

As we stated in chapter 1, data on the number of fatalities are available, but there is little information on the number of injuries caused by accidental shootings. This chapter reports on our examination of the universe of injuries and deaths caused by accidental firearm discharges. We first describe the methodology we used to determine the ratio of injuries to deaths. Next, we provide our findings on the accidental shooting cases in our sample. We conclude with a discussion of the estimates of injuries from accidental firearm discharges nationwide.

Methodology

We examined firearm accidents involving injuries, but no deaths, in order to develop some information about the frequency of such accidents and the relative proportion of injuries to deaths. As we noted in chapter 1, our examination of these accidents is based on a sample of 10 urban police departments. The lack of data on accidental shootings in many police departments limited our study.

As we sought data on firearm accidents from city police departments, we found that the sophistication of police department recordkeeping systems varied widely, as did the extent of data maintained on cases involving accidental firearms discharges. Because police department record systems are essentially designed to track crimes and not accidents, many police departments do not maintain records on accidental shootings unless they result in death. And those that do maintain records on accidental shootings often include these records in a large “miscellaneous” category that makes their retrieval and review very labor intensive and time consuming. In contrast, some police departments maintain records by code, with a different code for each type of event they investigate, including firearm accidents. Other departments group their reports into sufficiently narrow categories (for example, “accidents” and “assaults”) that the manual retrieval and review of the reports is feasible.

We identified 10 urban area police departments that maintained accessible records on accidental shootings and were willing to provide the case file information. To identify these police departments, we began with a list of jurisdictions suggested as having good data bases by several national law enforcement organizations. We contacted every police department suggested as well as others to which those departments referred us. The 10 cities included in our study were Tucson, Arizona; San Jose, California; Denver, Colorado; Atlanta, Georgia; Louisville, Kentucky; St. Paul, Minnesota; Albuquerque, New Mexico; Columbia,

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South Carolina; Dallas, Texas; and Salt Lake City, Utah. The 1986 area populations ranged from 93,000 to over 1 million.

We obtained information from the 10 police departments on all the reported accidental shootings in their jurisdictions in 1988 and 1989. In most states (including 8 of the 10 states where cities in our study are located), hospitals and physicians are required by law to report gunshot injuries to the police. Two of the states where our cities are located, New Mexico and Kentucky, have no such statewide legal requirement. However, according to police officials in the 2 cities studied in those two states, Albuquerque and Louisville, medical professionals report cases involving gunshot injuries as a common practice. As a result, we are confident that the majority of accidental injuries from firearms in our 10 sampled cities are captured in our study.

Such reporting requirements were not the sole reason we sought data from police departments rather than from hospitals, the most common source of injury information. We learned that hospital records typically do not include information about whether a firearm injury was accidentally or intentionally inflicted, and thus we could not separate accidents from suicide or homicide attempts.

At the 10 police departments, we examined a total of 532 cases of accidental firearms discharges that resulted in either injury or death in 1988 and 1989.¹ Whereas we could project from our sample of medical examiners and coroners the nationwide number of accidental deaths from firearms that could have been prevented, we cannot do so for injuries. Because our sample of the 10 urban police departments is not representative, we cannot generalize our results either regionwide or nationwide. Nevertheless, as there has been a dearth of data on accidental injuries from firearms, we believe that our data will contribute to the national base of knowledge on accidental injuries from firearms. Knowledge about the number of injuries that occur each year is important for understanding the size of the public health problem, a key element in any consideration of the need to find solutions to the problem.

Findings

Of the 532 accidental firearm discharge cases we examined, 527 resulted in injuries, and 5 resulted in deaths. This is a ratio of 105 to 1 of injuries

¹Not included in the 532 cases were shootings involving BB pistols or pellet guns and three cases with injuries where handguns loaded with blanks were intentionally fired. We also excluded cases of accidental firearms discharges where no one was injured and cases where the victim refused to cooperate with the police in providing any information about how the shooting occurred or who was involved.

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to deaths. Table 3.1 shows the numbers of injuries and deaths from accidental firearm discharges in the 10 cities.

**Table 3.1: Deaths and Injuries From
Accidental Firearm Discharges, 1988 and
1989**

City and state	Population ^a	Death	Injury	Total
Albuquerque, N. Mex.	366,750	1	48	49
Atlanta, Ga.	421,910	1	80	81
Columbia, S.C.	93,020	0	12	12
Dallas, Tex.	1,003,520	1	248	249
Denver, Colo.	505,000	2	15	17
Louisville, Ky.	286,470	0	34	34
St. Paul, Minn.	263,680	0	2	2
Salt Lake City, Utah.	158,440	0	12	12 ^b
San Jose, Calif.	712,080	0	19	19
Tucson, Ariz.	358,850	0	57	57
Total	4,169,720	5	527	532

^a1986 population.

^bDoes not include first three quarters of 1988.

The reasons for the wide variation in the cities' numbers of deaths and injuries, inconsistent with their population sizes, are unknown. To some extent, the variation may stem from differences in the police departments' recordkeeping systems. As we stated above, some departments had very sophisticated computerized systems that allowed for easier (and presumably more accurate) retrieval of cases. For example, Dallas, the city in our sample with the highest number of accidental shootings, had one of the most sophisticated recordkeeping systems.

Another reason for the wide variation may be differences in patterns of gun ownership. There are higher rates of gun ownership in the South and some parts of the West than in the North, for example. This may, in part, account for the low number of accidents in St. Paul and the higher numbers in Dallas, Atlanta, and Tucson. We have no ready explanation for why San Jose, the second largest city in our sample, had many fewer instances of accidental shootings than did Dallas, the largest city we studied.

At the least, however, the numbers of injuries are conservative. According to several police officials, some cases undoubtedly are not reported, although it is impossible to know how many. If some accidental shootings go unreported and uninvestigated, this is far more likely to happen in cases involving only injuries and no deaths. This

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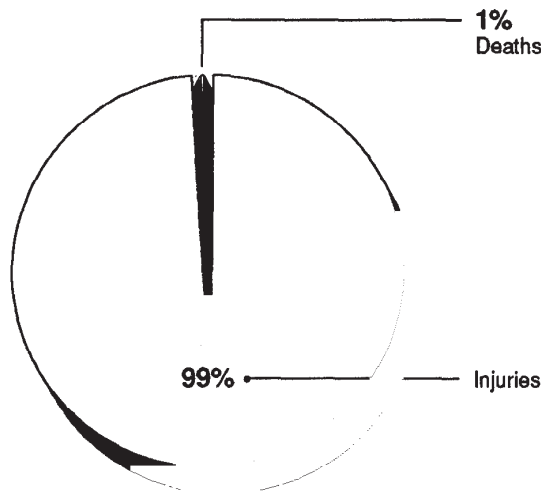
means that the reported numbers of deaths should be very accurate while the numbers of injuries may be underreported.

The characteristics of the accidental injury cases we reviewed were similar to those of the preventable and other death cases discussed in chapter 2. That is, the vast majority (90 percent) of the shooters were male, and almost half of all shooters were between the ages of 13 and 24. Most of the injuries were self-inflicted; most were caused by a handgun. In about two thirds of the cases, the accident occurred in or near a private residence.

The following case typifies the circumstances surrounding many of the accidental shootings in our sample. A 14-year-old youth was handling a .38 caliber handgun in his front yard. He assumed it to be unloaded and pulled the trigger, shooting himself in the foot.

Figure 3.1 shows, for the 532 cases we reviewed, that 99 percent of the accidental firearms discharges resulted in injuries rather than deaths. As already noted, we estimate that the ratio of injuries to fatalities is 105 to 1, based on the cases we reviewed in 10 cities.

Figure 3.1: Proportion of Injuries and Deaths Caused by Accidental Firearm Discharges



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Implications

As we stated in chapter 1, we know that the number of deaths nationwide resulting from accidental firearm discharges was 1,501 in 1988, the most recent year for which totals are available. Given the cases we reviewed in 10 cities, we derived an estimate of the ratio of injuries to deaths of 105 to 1. Were we to apply this estimate to the nation, using the known number of deaths, we would estimate that there were approximately 157,600 injuries from accidental firearm discharges each year. However, because the sample of cities on which the ratio is based was not randomly selected, we cannot generalize to the nation as a whole.

There are a number of potential sources of bias in the data. First, the data most likely underestimate the actual number of injuries because of the general lack of reporting of accidental shootings. This source of bias would mean that the true ratio of injuries to deaths would be even higher than what we found.

There are also potential biases that would indicate the true ratio nationwide could be lower than that in our sample (that is, nationwide there could be fewer than 105 injuries for every death). Our sample of jurisdictions, driven by data availability, was entirely urban, and this could bias an estimate of the proportion of accidents that were survivable. There are at least three factors directly related to the survivability of a shooting that could vary between urban and rural settings: the caliber of the firearm (.22, .45, and so on), the type of firearm (handgun, long gun, or shotgun), and the quality of medical treatment received. The caliber of the firearm could bias the estimate, since caliber is positively associated with lethality. If lower-caliber firearms are more common in urban shootings (which we do not know), then urban victims could have a greater likelihood of surviving, thus inflating the ratio of injuries to deaths. The type of firearm could bias the estimate, since rifles, more common in rural hunting situations, are more lethal, even when caliber is held constant, because the bullet is fired with greater velocity. Thus, if rural victims are more likely to be shot with rifles, a higher proportion of rural shootings would likely result in death. Finally, the quality of medical treatment could bias the estimate, since urban dwellers are generally closer to emergency care, resulting in urban gunshot victims being more likely to survive potentially fatal injuries.

One frequent source of bias from nonrandom samples, that the locations selected were somehow “unique” or different from average, we do not believe to be a problem for this study. There is no reason to expect that the most important factor in whether an accidental shooting proves

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fatal or not—where the bullet strikes the victim—should differ in any way from one locale to the next. Since these are accidental shootings, and not intentional, having a bullet strike a vital organ should largely be a random occurrence, regardless of whether the shooting is in an urban area or a rural one, a large city or a small one.

Even though we cannot validly project the proportion of injuries to deaths resulting nationally from accidental firearm discharges, there are some indications that the data from our sample are reasonable. As mentioned above, the characteristics of the cases in this sample are very similar to those from the representative sample of deaths we described in chapter 2. In addition, the figures seem in line with the injury-to-death ratios for other types of accidents. When the 105 to 1 ratio of injuries to deaths caused by accidental firearms discharges is compared with similar data for other types of accidents, our data appear consistent. For example, according to the National Safety Council, similar proportions of injuries to deaths exist nationwide for all accidents (94 to 1), accidents occurring in the workplace (162 to 1), and accidents occurring in the home (151 to 1).²

²These numbers are for “disabling injuries.” A disabling injury is defined as an injury causing death, permanent disability, or any degree of temporary total disability beyond the day of the accident.

Implications

The Size of the Problem

As we stated in chapter 1, the number of deaths from accidental shootings has been generally declining over the last several years. This would seem to indicate that the problem is not large and has leveled off. However, what is missing from this picture is any sense of the number of injuries resulting from accidental shootings. Without this information, we cannot judge how big a public health problem firearm accidents really are.

From the declining number of deaths, we cannot determine if the total number of accidental shootings is declining (and declining at the same rate) or if the same number of people are accidentally shot each year but better trauma care is saving the lives of an increasing proportion of the victims.

Our report presents data on the number of injuries associated with every death. Although we cannot project to the country as a whole, were there actually to be the same ratio nationwide as in the 10 cities we studied, that would mean there are approximately 157,600 such injuries each year.

That number, because of methodological limitations discussed in chapter 3, must be viewed as a gross estimate. However, the number does give some sense of the size of the problem. It seems obvious that the total number of accidental shootings is many times the number of fatalities. This is in line with other causes of accidental death and injury. For example, as mentioned in chapter 3, the ratio of workplace injuries to deaths is 162 to 1, while accidents in the home have an injury to death ratio of 151 to 1. Thus, a ratio of tens of injuries for each death seems reasonable for accidental shootings.

Even if one excluded Dallas, the city in our sample with the largest number of injuries, there would remain 279 injuries and 4 deaths (that is, a ratio of 70 to 1), still a large relative proportion of injuries to deaths. If one were to reduce by half the ratio of injuries to deaths that we found, that would still result in a projection of approximately 78,800 injuries annually from accidental shootings in the United States. If one were to reduce it even further, to account for any possible bias, it seems likely, and reasonable, that the resulting projection would still be tens of thousands of such injuries each year. If the true ratio of injuries to deaths nationwide were only one tenth of the ratio in the cities we studied, it would mean there are over 15,000 injuries from accidental shootings each year.

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In addition to the tragedy of these shootings, occurring as they primarily do among young people, there is the issue of costs. As mentioned in chapter 2, the costs associated with gunshot wounds are quite high. Thus, the economic effect of thousands of accidental shootings could be significant. Even if the true number of accidental shootings is smaller than the ratio from the 10 cities studied would indicate, the costs would still be substantial. If there were 1,500 deaths and some 12,000 hospitalizations (less than one tenth the number of injuries estimated from our sample of cities) every year, that would translate into an estimated lifetime cost, each year, of close to \$1 billion.¹ (See appendix II for further discussion of the costs of firearms injuries and deaths.)

It seems clear that thousands of individuals and families are affected by these accidents each year. We turn now to a discussion of approaches that are available for reducing the number of such shootings.

**Approaches to
Reducing Accidental
Shootings**

Many of the accidental shootings each year are preventable. Of the fatal shootings we examined, we estimate that 31 percent could have been prevented by two technological modifications to firearms. Undoubtedly, additional fatalities were preventable among cases in which there was insufficient information for us to make a determination. Many nonfatal shootings are obviously also preventable.

Different approaches could be taken to try to reduce the number of accidental shootings. These include mandating modifications to firearms, requiring training in gun safety, and enacting statutes to penalize gun owners who are negligent in their handling or storage of weapons.

**Mandated Modifications to
Firearms**

Our research has demonstrated that lives could be saved and injuries prevented if all guns were equipped with either a child-proof safety or a loading indicator or both. There are clearly instances in which such devices would prevent tragedy. Our projections are that, at current accident rates, some 458 lives could be saved each year if all firearms had both these safety devices.

¹The lifetime cost of an accident is defined as the present discounted value of costs occurring in all future years. Costs include actual dollar expenditures related to illness or injury, including amounts spent for hospital and nursing home care, physician and other medical professional services, drugs and appliances, and rehabilitation. Estimates also include life years lost and the indirect cost associated with loss of earnings because of short- and long-term disability and premature death from injury. The estimated costs are derived from data for all shootings, not just unintentional shootings.

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Gun manufacturers could choose to modify their firearms to include child-proof safeties or loading indicators, motivated by a desire to promote greater welfare or to avoid potential litigation or by pressure from consumers demanding firearms with such features. However, if a guarantee were needed that all firearms have these safety devices, this would have to be mandated by legislative action of the Congress. Current statutes place firearms outside the jurisdiction of the Consumer Product Safety Commission, and the Bureau of Alcohol, Tobacco, and Firearms is not empowered to control these design aspects of guns. Thus, regulatory action to require modifications could not be taken without specific new legislation.

A child-proof safety that automatically engaged and that came as a built-in part of the firearm could protect young children from adults' carelessness in storing loaded weapons where children can have access to them. Just as passive seat belts that automatically engage have been required in automobiles to protect the occupants without requiring that specific actions be taken each time the vehicle is used, child-proof safety devices on firearms could provide protection in the absence of specific behavior to secure the firearms. Child-proof safeties on firearms could prevent over 100 instances annually in which children fatally shoot someone, often themselves or another child.

Likewise, loading indicators could potentially prevent over 300 deaths resulting from accidental shootings each year among adolescents and adults. Our research demonstrates that, even more than child-proof safeties, this modification could potentially prevent many injuries and deaths. Such a device might also take the "fun" out of such games as Russian roulette.

Our projections of the number of lives saved that could be attributable to these safety devices require that two conditions be met. First, all firearms would have to be equipped with these devices. And second, all other relevant conditions would remain unchanged. That is, there would be no increase in gun safety awareness or education in safe gun-handling practices, because such changes could also save lives.

There are potential problems in implementing any requirement for firearms to be equipped with these safety devices. First, there may be technological difficulties to overcome in designing child-proof safeties and loading indicators for the myriad firearms on the market. In addition, there are possible logistical difficulties:

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- loading indicator devices would require that users (including unintended users, such as adolescents) be educated to understand their use and to recognize the indication that the firearms were loaded;
 - there are possible objections to the desirability of having onlookers be able to readily judge if a firearm is loaded (for example, if a weapon is being used for protection); and
 - this type of child-proof safety would only prevent very young children from firing the gun and would likely not be effective against use by older children or adolescents.

Beyond the logistics of implementing the modifications, there is the question of effectiveness. Our projections for the number of lives that could be saved each year assumes that all firearms are equipped with these safety devices. But any changes of this type would presumably be mandated only for new firearms entering the market.

While over 4 million firearms are manufactured in the United States each year, there are an estimated 200 million firearms already in the market. Approximately 50 percent of U.S. households report owning one or more firearms. This represents an enormous pool of weapons that would not be affected by design modifications. Furthermore, firearms, unlike many consumer products, have a long period of use. It is not uncommon for firearms to be passed from one generation to the next, so it cannot be expected that within a decade, for example, the majority of old-style firearms would be out of use. To affect this pool of weapons, owners would have to be required to modify all their firearms, to equip them with the two safety devices.

Other Approaches

Other options are available, including many devices currently on the market, designed to prevent a firearm from being used by any unauthorized person. These include locking storage cases, trigger guards, combination locks that can be built into the weapon, and a variety of other mechanisms for securing firearms of different types. In addition, there is the simple expedient of keeping firearms unloaded, with ammunition stored separately.

However, all these approaches require some positive action on the part of the user to ensure that the firearms are not accessible to children or other unauthorized users. Passive restraints in automobiles were required when data showed that many passengers were not using seat belts that required buckling. The current number of accidents with firearms is testament to the fact that gun users frequently do not take the

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available safety steps. It is not known if education in proper safety procedures would be sufficient to ensure that appropriate precautions would be taken. And requiring that all purchasers of firearms take gun safety training would necessitate some form of registration and monitoring of gun owners.

We know of no ready replacements on the market for a loading indicator. The necessary alternative is proper education in the use and handling of firearms. All users need to be trained to immediately inspect a weapon to determine if it is loaded before handling it further. As we stated in chapter 2, a majority of the accidents we examined involved some violation of safe gun-handling standards. Unfortunately, as our research has shown, many fatal accidents involve users who are not the owners of the firearms. Thus, firearm training aimed at owners will not prevent many of these accidents if others are allowed access to a loaded weapon.

Some states have adopted an approach aimed at encouraging owners to take proper precautions in storing their firearms. Both Florida and Connecticut have recently enacted statutes to hold adults guilty of criminal negligence if they allow minors to gain access to loaded firearms that are subsequently involved in accidental shootings. Penalties include fines and possible imprisonment. Other states (including Wisconsin and Virginia) have considered, but not passed, similar statutes.

**Conclusion and
Recommendation**

The number of individuals being injured and killed each year in accidental shootings is substantial. Whereas the problem may have been viewed as small when only the number of deaths was known, we now know that the overall problem is likely to be very large, with many thousands of individuals being injured each year.

We have demonstrated the potential effectiveness of two technologies—child-proof safeties and loading indicators—for preventing some of these accidents, thereby reducing the number of deaths and injuries. However, there remain obstacles to realizing this promise. How these mechanisms might be implemented is not immediately clear.

These mechanisms are not the only approaches available, however. There are other approaches (for example, training gun owners or limiting access to firearms) that may be equally or more effective.

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The human, economic, and public health costs of these shootings to the victims, their families, and society are considerable. The magnitude of the problem requires that all possible efforts be made to reduce the number of accidental shootings.

The Consumer Product Safety Commission, the primary federal agency with responsibility for product safety, is currently not allowed to take any action that might restrict the availability of firearms to the consumer. We recommend that the Consumer Product Safety Act be amended to clearly establish that the Consumer Product Safety Commission can regulate the risk of injury associated with firearms. Suggested legislative language for implementing our recommendation is provided in appendix III.

Appendix I

Sampling and Estimation Methodology

The study design involved collecting data from two separate samples. One sample was used to examine the preventability of accidental shootings by child-proof safeties and loading indicator mechanisms. A second sample was used to examine the prevalence of nonfatal injuries from accidental shootings. We discuss each sample in turn.

Sample for Examining Preventability

To determine the percentage of accidental deaths from firearms that could have been prevented by either of the two types of devices, we examined data from medical examiners and coroners in a random sample of jurisdictions from across the United States. In each jurisdiction, we contacted state vital records offices and the coroners or medical examiners and asked if there had been any deaths from accidental shootings in 1988 or 1989, the most recent years for which data were available at the time of our study.

We collected information only for shooting deaths classified as accidental. For jurisdictions using the ICD-9 coding system, we limited the data collection to fatalities coded under the E922 category (“accident caused by firearm missile”).¹ Thus, we excluded deaths involving firearms that were classified as suicides or homicides or could not be classified.

The sampling frame was the 3,139 counties and independent cities listed by the Bureau of the Census.² We divided these jurisdictions into two strata on the basis of population: an urban stratum (population greater than or equal to 50,000) and a rural stratum (fewer than 50,000 residents). We then selected a random sample of jurisdictions within each stratum. We selected 60 urban jurisdictions and 50 rural jurisdictions, for a total of 110 counties and independent cities. Data were not obtained for either year in 3 jurisdictions. One year’s data were unavailable in an additional 4 jurisdictions.

From the data we collected, we computed sampling errors for the major findings on preventability presented in chapter 2. We present our estimates in table I.1, along with the sampling error for each estimate. When added to and subtracted from the estimates, the sampling errors provide the 95-percent confidence interval for each finding.

¹U.S. Department of Health and Human Services, *The International Classifications of Diseases, 9th Revision, Clinical Modification*, 2nd ed. (Washington, D.C.: 1980).

²U.S. Department of Commerce, *County and City Data Book* (Washington, D.C.: 1988).

Appendix I
Sampling and Estimation Methodology

**Table I.1: Estimates and Sampling Errors
for Findings on Preventability^a**

Variable	Estimate	Sampling error
Preventable by a child-proof device	7.5%	4.2%
Preventable by a loading indicator device	23.0	6.6
Total preventable by either device	30.5	5.9
Nonpreventable by either device	51.1	8.3
Preventability could not be determined	16.7	7.3

^aFigures represent percent of accidental deaths.

For a check on the accuracy of our sample, we used our data to generate an estimate of the expected number of accidental deaths in a year. Using these data, we estimate that 1,581 deaths from accidental shootings (plus or minus 696) would be expected in a year. This estimate compares favorably with the known number of 1,501 deaths in 1988.

We also computed estimates and sampling errors for the other variables presented in chapter 2 (sex and age of shooters, percentage of self-inflicted shootings, location of accident, type of weapon, and ownership of weapon). These estimates are available upon request.

Sample for Examining Injuries

We employed a snowball sampling technique to identify police jurisdictions where the needed information was retrievable. We began by asking experts on police departments (from the National Institute of Justice, the National Criminal Justice Reference Service, the Police Executive Research Forum, and the Police Management Association) to list any departments with records systems that might contain information on accidental shootings in an accessible form. We contacted every police department suggested in order to determine the feasibility of obtaining the needed case records. In addition, at each department, we asked for referrals to other departments where the needed information might be obtained. This process of contacting departments and asking for referrals was continued until the list of new department names was exhausted.

We identified 10 urban area police departments that maintained accessible records on accidental shootings and that were willing to provide the case file information. The 10 cities included in our study were Tucson, Arizona; San Jose, California; Denver, Colorado; Atlanta, Georgia; Louisville, Kentucky; St. Paul, Minnesota; Albuquerque, New Mexico; Columbia, South Carolina; Dallas, Texas; and Salt Lake City, Utah. Because this was a convenience sample of departments, the results from these 10 cities cannot be generalized to the country as a whole.

Costs of Firearm Injuries

The specific information needed to develop a precise estimate of the costs of unintentional firearm injuries and deaths is not available. However, the information that is available shows that the total costs associated with gunshot wounds are likely to be quite high.

One recent study estimates the average lifetime cost of different types of injuries, defined as the present discounted value of costs occurring in all future years.¹ Costs are enumerated as actual dollar expenditures related to illness or injury, including amounts spent for hospital and nursing home care, physician and other medical professional services, drugs and appliances, and rehabilitation. The cost estimates also include life years lost and the indirect cost associated with loss of earnings from short- and long-term disability and premature death from injury.

Using this approach, the average lifetime cost of a firearm injury (including both fatal and nonfatal injuries) is estimated to be \$53,831.² This can be broken down into estimated costs for firearm injuries of different levels of severity. For those that do not require hospitalization, the estimated per person cost is \$458, while injuries requiring hospitalization are estimated to cost \$33,159 per person. And the average lifetime cost of a firearm fatality is \$373,520, the highest of any cause of injury.

We know from national mortality data that about 1,500 people die each year in the United States from accidental shootings. Based on data from the National Hospital Discharge Survey, it is estimated that in excess of 65,000 persons are hospitalized every year with injuries resulting from firearms. However, it is not known how many of these firearm injuries are unintentional. One study of hospitalizations over the course of a year at one regional trauma center found that 18.8 percent of the firearm-related injuries were unintentional.³ Applying this 18.8-percent figure to the 65,129 firearm-related hospitalizations nationwide yields an estimate of 12,244 annual hospitalizations from unintentional

¹Dorothy P. Rice et al., *Cost of Injury in the United States: A Report to Congress* (San Francisco, Calif.: Institute for Health and Aging, University of California, and Injury Prevention Center, The Johns Hopkins University, 1989).

²Rice's cost estimates are in 1985 dollars.

³Michael J. Martin et al., "The Cost of Hospitalization for Firearm Injuries," *Journal of the American Medical Association*, 260:20 (November 25, 1988), 3048-50. The 18.8-percent figure was computed omitting cases that could not be categorized as either intentional or unintentional.

Appendix II
Costs of Firearm Injuries

firearm injuries. There are no reliable estimates of the number of persons each year who suffer firearm-related injuries that do not require hospitalization.

The estimates from the study on costs can be combined with the incidence data to derive a rough estimate of the overall costs associated with the unintentional firearm injuries and deaths occurring in a single year. The average lifetime costs associated with 1,500 deaths would be over \$500 million (that is, 1,500 times \$373,520 equals \$560,280,000). For 12,244 hospitalizations, the average lifetime cost would be over \$400 million (that is, 12,244 times \$33,159 equals \$405,998,796). So, omitting any costs associated with injuries not requiring hospitalization, the estimated lifetime costs for accidental shootings is close to \$1 billion (\$966,278,796) every year.

The estimated costs associated with shootings can also be used to value the savings that would be associated with specific types of prevention. In chapter 2, we estimated that some 458 deaths might be prevented each year if all firearms were equipped with child-proof safeties and loading indicators. If 458 deaths were averted, this would avoid lifetime costs estimated to exceed \$170 million.

The estimates above are based on one approach to estimating the costs of firearm injuries and deaths. Different federal agencies have used different dollar amounts for the value of life, ranging from several hundred thousand dollars to several million dollars. If higher figures are considered in the calculations, the estimated costs of accidental shootings can increase dramatically. For example, one frequently used value is \$2 million.⁴ Applying the \$2 million figure to the 1,500 deaths that occur each year yields an estimated annual value of life lost through accidental shootings of \$3 billion. Applying this value to our projection of 458 deaths that might be averted would yield estimated annual savings of over \$900 million. Higher assigned values for each life would result in higher estimated savings.

⁴Clayton P. Gillette and Thomas D. Hopkins, *Federal Agency Valuations of Human Life* (Washington, D.C.: Administrative Conference of the United States, 1988).

Suggested Legislative Language

This appendix suggests legislative language that would implement the revisions we recommend to clearly establish that the Consumer Product Safety Commission can regulate the risk of injury associated with firearms. The legislative language should read as follows:

Section 3(a) of the Consumer Product Safety Act (15 USC 2052) is amended by striking out subparagraph (a)(1)(E) and redesignating subparagraphs (F) through (I) as subparagraphs (E) through (H), respectively.

Section 8 of the Consumer Product Safety Act (15 USC 2057) is amended by adding at the end thereof the following sentence:

This section shall not apply in the Commission's regulation of the risk of injury associated with firearms.

Section 3 of the Consumer Product Safety Commission Improvements Act of 1976 (15 USC 2080 note) is amended by striking out subparagraph (d)(2) and subparagraph (e) and inserting in lieu thereof:

(e) the Consumer Product Safety Commission has authority to regulate the risk of injury associated with firearms.

Section 3 of the Consumer Product Safety Commission Improvements Act of 1976 (15 USC 2080) is further amended by striking out "(1)" in subparagraph (d).

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 9 Director of the Department of Justice Bureau of
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 10

11 IN THE UNITED STATES DISTRICT COURT
 12 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
 13 CIVIL DIVISION
 14

15
 16 **LANA RAE RENNA et al.,**
 17 Plaintiffs,
 18 v.
 19 **ROB BONTA, in his official capacity**
 20 **as Attorney General of California;**
 21 **and ALLISON MENDOZA, in her**
 22 **official capacity as Acting Director of**
 23 **the Department of Justice Bureau of**
 24 **Firearms,**
 25 Defendants.

8:17-cv-00746-JLS-JDE
**DECLARATION OF SAUL
 CORNELL IN SUPPORT OF
 DEFENDANTS' OPPOSITION TO
 PLAINTIFFS' MOTION FOR
 PRELIMINARY INJUNCTION OR,
 ALTERNATIVELY, MOTION FOR
 SUMMARY JUDGMENT**
 Date: February 10, 2023
 Time: 1:30 p.m.
 Dept: 13A (13th Floor)
 Judge: The Honorable Dana M.
 Sabraw
 Trial Date: None set
 Action Filed: 11/10/2020

1 I, Saul Cornell, declare that the following is true and correct:

2 1. I have been asked by the Office of the Attorney General for the State
3 of California to provide an expert opinion on the history of firearms regulation in
4 the Anglo-American legal tradition, with a particular focus on how the Founding
5 era understood the right to bear arms, as well as the understanding of the right to
6 bear arms held at the time of the ratification of the Fourteenth Amendment to the
7 United States Constitution. In *N.Y. State Rifle & Pistol Association, Inc. v. Bruen*,
8 the U.S. Supreme Court underscored that text, history, and tradition are the
9 foundation of modern Second Amendment jurisprudence. This modality of
10 constitutional analysis requires that courts analyze history and evaluate the
11 connections between modern gun laws and earlier approaches to firearms regulation
12 in the American past. My report explores these issues in some detail. Finally, I
13 have been asked to evaluate the statutes at issue in this case, particularly regarding
14 their connection to the tradition of firearms regulation in American legal history.

15 2. This declaration is based on my own personal knowledge and
16 experience, and if I am called to testify as a witness, I could and would testify
17 competently to the truth of the matters discussed in this declaration.

18 **BACKGROUND AND QUALIFICATIONS**

19 3. I am the Paul and Diane Guenther Chair in American History at
20 Fordham University. The Guenther Chair is one of three endowed chairs in the
21 history department at Fordham and the only one in American history. In addition to
22 teaching constitutional history at Fordham University to undergraduates and
23 graduate students, I teach constitutional law at Fordham Law School. I have been a
24 Senior Visiting research scholar on the faculty of Yale Law School, the University
25 of Connecticut Law School, and Benjamin Cardozo Law School. I have given
26 invited lectures, presented papers at faculty workshops, and participated in
27 conferences on the topic of the Second Amendment and the history of gun
28 regulation at Yale Law School, Harvard Law School, Stanford Law School, UCLA

1 Law School, the University of Pennsylvania Law School, Columbia Law School,
2 Duke Law School, Pembroke College Oxford, Robinson College, Cambridge,
3 Leiden University, and McGill University.¹

4 My writings on the Second Amendment and gun regulation have been widely
5 cited by state and federal courts, including the majority and dissenting opinions in
6 *Bruen*.² My scholarship on this topic has appeared in leading law reviews and top
7 peer-reviewed legal history journals. I authored the chapter on the right to bear
8 arms in *The Oxford Handbook of the U.S. Constitution* and co-authored the chapter
9 in *The Cambridge History of Law in America* on the Founding era and the Marshall
10 Court, the period that includes the adoption of the Constitution and the Second
11 Amendment.³ Thus, my expertise not only includes the history of gun regulation
12 and the right to keep and bear arms, but also extends to American legal and
13 constitutional history broadly defined. I have provided expert witness testimony in
14 *Rocky Mountain Gun Owners, Nonprofit Corp. v. Hickenlooper*, No. 14-cv-02850
15 (D. Colo.); *Chambers, v. City of Boulder*, No. 2018 CV 30581 (Colo. D. Ct.,
16 Boulder Cty.), *Zeleny v. Newsom*, No. 14-cv-02850 (N.D. Cal.), and *Miller v. Smith*,
17 No. 2018-cv-3085 (C.D. Ill.); *Jones v. Bonta*, 3:19-cv-01226-L-AHG (S.D. Cal.);
18 *Baird v. Bonta*, No. 2:19-cv-00617 (E.D. Cal.); *Worth v. Harrington*, No. 21-cv-
19 1348 (D. Minn.); *Miller v. Bonta*, No. 3:19-cv-01537-BEN-JLB (S.D. Cal.);
20 *Duncan v. Bonta*, No. 3:17-cv-01017-BEN-JLB (S.D. Cal.); *Rupp v. Bonta*, No.
21 8:17-cv-00746-JLS-JDE (C.D. Cal.); and Nat'l Assoc. for Gun Rights, et al., v.
22 Campbell, D. Mass. No. 1:22-cv-11431-FDS (filed Jan. 31, 2023).

23 ¹ For a full *curriculum vitae* listing relevant invited and scholarly
24 presentations, see Exhibit 1.

25 ² *N.Y. State Rifle & Pistol Ass'n v. Bruen*, 142 S. Ct. 2111 (2022).

26 ³ Saul Cornell, *The Right to Bear Arms*, in THE OXFORD HANDBOOK OF THE
27 U.S. CONSTITUTION 739–759 (Mark Tushnet, Sanford Levinson & Mark Graber
28 eds., 2015); Saul Cornell & Gerald Leonard, *Chapter 15: The Consolidation of the
Early Federal System*, in 1 THE CAMBRIDGE HISTORY OF LAW IN AMERICA 518–544
(Christopher Tomlins & Michael Grossberg eds., 2008).

1 **RETENTION AND COMPENSATION**

2 4. I am being compensated for services performed in the above-entitled
3 case at an hourly rate of \$500 for reviewing materials, participating in meetings,
4 and preparing reports; \$750 per hour for depositions and court appearances; and an
5 additional \$100 per hour for travel time. My compensation is not contingent on the
6 results of my analysis or the substance of any testimony.

7 **BASIS FOR OPINION AND MATERIALS CONSIDERED**

8 5. The opinion I provide in this report is based on my review of the
9 operative complaint filed in this lawsuit, my review of the state laws at issue in this
10 lawsuit, my education, expertise, and research in the field of legal history. The
11 opinions contained herein are made pursuant to a reasonable degree of professional
12 certainty.

13 **SUMMARY OF OPINIONS**

14 6. Understanding text, history, and tradition require a sophisticated grasp
15 of historical context. One must canvass the relevant primary sources, secondary
16 literature, and jurisprudence to arrive at an understanding of the scope of
17 permissible regulation consistent with the Second Amendment.

18 7. It is impossible to understand the meaning and scope of Second
19 Amendment protections without understanding the way Americans in the Founding
20 era approached legal questions and rights claims. In contrast to most modern
21 lawyers, the members of the First Congress who wrote the words of the Second
22 Amendment and the American people who enacted the text into law were well
23 schooled in English common law ideas. Not every feature of English common law
24 survived the American Revolution, but there were important continuities between
25 English law and the common law in America.⁴ Each of the new states, either by

26 _____
27 ⁴ William B. Stoebuck, *Reception of English Common Law in the American*
28 *Colonies*, 10 WM. & MARY L. REV. 393 (1968); MD. CONST. OF 1776,
DECLARATION OF RIGHTS, art. III, § 1; Lauren Benton & Kathryn Walker, *Law for*

1 statute or judicial decision, adopted multiple aspects of the common law, focusing
2 primarily on those features of English law that had been in effect in the English
3 colonies for generations.⁵ No legal principle was more important to the common
4 law than the concept of the peace.⁶ As one early American justice of the peace
5 manual noted: “the term peace, denotes the condition of the body politic in which
6 no person suffers, or has just cause to fear any injury.”⁷ Blackstone, a leading
7 source of early American views about English law, opined that the common law
8 “hath ever had a special care and regard for the conservation of the peace; for peace
9 is the very end and foundation of civil society.”⁸

10 8. In *Bruen*, Justice Kavanaugh reiterated *Heller*’s invocation of
11 Blackstone’s authority as a guide to how early Americans understood their
12 inheritance from England. Specifically, Justice Kavanaugh stated in unambiguous
13 terms that there was a “well established historical tradition of prohibiting the
14 carrying of dangerous and unusual weapons.”⁹ The dominant understanding of

15 *the Empire: The Common Law in Colonial America and the Problem of Legal*
16 *Diversity*, 89 CHI.-KENT L. REV. 937 (2014).

17 ⁵ 9 STATUTES AT LARGE OF PENNSYLVANIA 29-30 (Mitchell & Flanders eds.
18 1903); FRANCOIS XAVIER MARTIN, A COLLECTION OF STATUTES OF THE
19 PARLIAMENT OF ENGLAND IN FORCE IN THE STATE OF NORTH-CAROLINA 60–61
20 (Newbern, 1792); *Commonwealth v. Leach*, 1 Mass. 59 (1804).

21 ⁶ LAURA F. EDWARDS, THE PEOPLE AND THEIR PEACE: LEGAL CULTURE AND
22 THE TRANSFORMATION OF INEQUALITY IN THE POST-REVOLUTIONARY SOUTH
(University of North Carolina Press, 2009).

23 ⁷ JOSEPH BACKUS, THE JUSTICE OF THE PEACE 23 (1816).

24 ⁸ 1 WILLIAM BLACKSTONE, COMMENTARIES *349.

25 ⁹ *District of Columbia v. Heller*, 554 U.S. 570, 626–627 (2008), and n. 26.
26 Blackstone and Hawkins, two of the most influential English legal writers consulted
27 by the Founding generation, described these types of limits in slightly different
28 terms. The two different formulations related to weapons described as dangerous
and unusual in one case and sometimes as dangerous or unusual in the other
instance, see Saul Cornell, *The Right to Carry Firearms Outside of the Home: Separating Historical Myths from Historical Realities*, 39 FORDHAM URB. L.J. 1695134 (2012). It is also possible that the phrase was an example of an archaic grammatical and rhetorical form hendiadys; see Samuel Bray, *Necessary AND*

1 the Second Amendment and its state constitutional analogues at the time of their
 2 adoption in the Founding period forged an indissoluble link between the right to
 3 keep and bear arms with the goal of preserving the peace.¹⁰

4 9. “Constitutional rights,” Justice Scalia wrote in *Heller*, “are enshrined
 5 with the scope they were thought to have when the people adopted them.”¹¹

6 Included in this right was the most basic right of all: the right of the people to
 7 regulate their own internal police. Although modern lawyers and jurists are
 8 accustomed to thinking of state police power, the Founding generation viewed this
 9 concept as a right, not a power.¹² The first state constitutions clearly articulated
 10 such a right — including it alongside more familiar rights such as the right to bear
 11 arms.¹³ Pennsylvania’s Constitution framed this estimable right succinctly: “That

12 _____
 13 *Proper’ and ‘Cruel AND Unusual’: Hendiadys in the Constitution*, 102 VIRGINIA L.
 REV. 687 (2016).

14 ¹⁰ On Founding-era conceptions of liberty, see JOHN J. ZUBLY, THE LAW OF
 15 LIBERTY (1775). The modern terminology to describe this concept is “ordered
 16 liberty.” See *Palko v. Connecticut*, 302 U.S. 319, 325 (1937). For a more recent
 17 elaboration of the concept, see generally JAMES E. FLEMING & LINDA C. MCCLAIN,
 18 ORDERED LIBERTY: RIGHTS, RESPONSIBILITIES, AND VIRTUES (Harvard University
 19 Press, 2013). On Justice Cardozo and the ideal of ordered liberty, see *Palko v.*
Connecticut, 302 U.S. 319, 325 (1937); John T. Noonan, Jr., *Ordered Liberty:*
Cardozo and the Constitution, 1 CARDOZO L. REV. 257 (1979); Jud Campbell,
Judicial Review, and the Enumeration of Rights, 15 GEO. J.L. & PUB. POL’Y 569
 (2017).

20 ¹¹ *Heller*, 554 U.S. at 634–35; William J. Novak, *Common Regulation: Legal*
 21 *Origins of State Power in America*, 45 HASTINGS L.J. 1061, 1081–83 (1994);
 22 Christopher Tomlins, *Necessities of State: Police, Sovereignty, and the*
Constitution, 20 J. POL’Y HIST. 47 (2008).

23 ¹² On the transformation of the Founding era’s ideas about a “police right”
 24 into the more familiar concept of “police power,” See generally Aaron T. Knapp,
 25 *The Judicialization of Police*, 2 CRITICAL ANALYSIS OF L. 64 (2015); see also
 26 MARKUS DIRK DUBBER, THE POLICE POWER: PATRIARCHY AND THE FOUNDATIONS
 OF AMERICAN GOVERNMENT (2005); Christopher Tomlins, *Necessities of State:*
Police, Sovereignty, and the Constitution, 20 J. OF POL’Y HIST. 47 (2008).

27 ¹³ PA. CONST. of 1776, ch. I, art. III; MD. DECLARATION OF RIGHTS, art. IV
 28 (1776); N.C. DECLARATION OF RIGHTS, art. I, § 3 (1776); and VT. DECLARATION OF
 RIGHTS, art. V (1777).

1 the people of this State have the sole, exclusive and inherent right of governing and
2 regulating the internal police of the same. Thus, if Justice Scalia’s rule applies to
3 the scope of the right to bear arms, it must also apply to the scope of the right of the
4 people to regulate their internal police, a point that Chief Justice Roberts and
5 Justice Kavanaugh have each underscored.¹⁴ The history of gun regulation in the
6 decades after the right to bear arms was codified in both the first state constitutions
7 and the federal bill of rights underscores this important point.

8 10. In the years following the adoption of the Second Amendment and its
9 state analogues, firearm regulation increased. Indeed, the individual states
10 exercised their police powers to address longstanding issues and novel problems
11 created by firearms in American society.

12 **I. THE HISTORICAL INQUIRY REQUIRED BY *BRUEN*, *MCDONALD*, AND**
13 ***HELLER***

14 11. The United States Supreme Court’s decisions in *Heller*, *McDonald*¹⁵,
15 and *Bruen* have directed courts to look to text and history for guideposts in
16 evaluating the scope of permissible firearms regulation under the Second
17 Amendment. In another case involving historical determinations, Justice Thomas,
18 the author of the majority opinion in *Bruen*, has noted that judges must avoid
19 approaching history, text, and tradition with an “ahistorical literalism.”¹⁶ Legal
20 texts must not be read in a decontextualized fashion detached from the web of
21 historical meaning that made them comprehensible to Americans living in the past.

22
23 _____
24 ¹⁴ John Roberts, Transcript of Oral Argument at 44, *Heller*, 554 U.S. 570;
25 *Heller v. District of Columbia* (Heller II), 670 F.3d 1244, 1270 (D.C. Cir. 2011)
(Kavanaugh, J., dissenting); Joseph S. Hartunian, Gun Safety in the Age of
Kavanaugh 117 Michigan Law Review online 104 (2019).

26 ¹⁵ *McDonald v. City of Chicago*, 561 U.S. 742 (2010).

27 ¹⁶ *Franchise Tax Board of California v. Hyatt*, 139 S. Ct. 1485, 1498 (2019)
28 (Thomas, J.) (criticizing “ahistorical literalism”).

1 Instead, understanding the public meaning of constitutional texts requires a solid
2 grasp of the relevant historical contexts.¹⁷

3 12. Following the mandates set out in *Heller*, *McDonald* and more recently
4 in *Bruen*, history provides essential guideposts in evaluating the scope of
5 permissible regulation under the Second Amendment.¹⁸ Moreover, as *Bruen* makes
6 clear, history neither imposes “a regulatory straightjacket nor a regulatory blank
7 check.”¹⁹ The Court acknowledged that when novel problems created by firearms
8 are issue the analysis must reflect this fact: “other cases implicating unprecedented
9 societal concerns or dramatic technological changes may require a more nuanced
10 approach.” *Bruen* differentiates between cases in which contested regulations are
11 responses to long standing problems and situations in which modern regulations
12 address novel problems with no clear historical analogues from the Founding era or
13 the era of the Fourteenth Amendment.

14 13. In the years between *Heller* and *Bruen*, historical scholarship has
15 expanded our understanding of the history of arms regulation in the Anglo-
16 American legal tradition, but much more work needs to be done to fill out this
17 picture.²⁰ Indeed, such research is still ongoing: new materials continue to emerge;
18 and in the months since *Bruen* was decided, additional evidence about the history of
19 regulation has surfaced and new scholarship interpreting it has appeared in leading
20 law reviews and other scholarly venues.²¹

21 ¹⁷ See Jonathan Gienapp, *Historicism and Holism: Failures of Originalist*
22 *Translation*, 84 *FORDHAM L. REV.* 935 (2015).

23 ¹⁸ *Bruen*, 142 S. Ct. 2111.

24 ¹⁹ *Id.*

25 ²⁰ Eric M. Ruben & Darrell A. H. Miller, *Preface: The Second Generation of*
Second Amendment Law & Policy, 80 *L. & CONTEMP. PROBS.* 1 (2017).

26 ²¹ *Symposium — The 2nd Amendment at the Supreme Court: “700 Years Of*
27 *History” and the Modern Effects of Guns in Public*, 55 *U.C. DAVIS L. REV.* 2495
28 (2022); *NEW HISTORIES OF GUN RIGHTS AND REGULATION: ESSAYS ON THE PLACE*
OF GUNS IN AMERICAN LAW AND SOCIETY (Joseph Blocher, Jacob D. Charles &

1 14. Justice Kavanaugh underscored a key holding of *Heller* in his *Bruen*
2 concurrence: “Like most rights, the right secured by the Second Amendment is not
3 unlimited. From Blackstone through the 19th-century cases, commentators and
4 courts routinely explained that the right was not a right to keep and carry any
5 weapon whatsoever in any manner whatsoever and for whatever purpose.”
6 Crucially, the Court further noted that “we do think that *Heller* and *McDonald* point
7 toward at least two metrics: how and why the regulations burden a law-abiding
8 citizen’s right to armed self-defense.”²²

9 15. One overarching principle regarding firearms regulation does
10 emerge from this period and it reflects not only the common law assumptions
11 familiar to the Founding generation, but it is hard-wired into the Second
12 Amendment itself. As Justice Scalia noted in *Heller*, and Justice Thomas reiterated
13 in *Bruen*, the original Second Amendment was a result of interest balancing
14 undertaken by the people themselves in framing the federal Constitution and the
15 Bill of Rights. Although “free-standing balancing” is precluded by *Heller*, the plain
16 meaning of the Amendment’s text recognizes a role for regulation explicitly and
17 further underscores that actions inimical to a free state fall outside of the scope of
18 the right instantiated in the text.²³ Thus, from its outset the Second Amendment
19 recognizes both the right to keep and bear arms and the right of the people to
20 regulate arms to promote the goals of preserving a free state. An exclusive focus on
21 rights and a disparagement of regulation is thus antithetical to the plain meaning of
22 the text of the Second Amendment. Although rights and regulation are often cast as
23 antithetical in the modern gun debate, the Founding generation saw the two goals as
24 complimentary.

25
26 _____
27 Darrell A.H. Miller eds., forthcoming 2023).

28 ²² *Bruen*, 142 S. Ct. at 2132–33.

²³ U.S. Const. amend. II.

1 16. Comparing the language of the Constitution’s first two amendments
2 and their different structures and word choice makes this point crystal clear. The
3 First Amendment prohibits “abridging” the rights it protects. In standard American
4 English in the Founding era, to “abridge” meant to “reduce.” Thus, the First
5 Amendment prohibits a diminishment of the rights it protects. The Second
6 Amendment’s language employs a very different term, requiring that the right to
7 bear arms not be “infringed.”²⁴ In Founding-era American English, the word
8 “infringement” meant to “violate” or “destroy.” In short, when read with the
9 Founding era’s interpretive assumptions and legal definitions in mind, the two
10 Amendments set up radically different frameworks for evaluating the rights they
11 enshrined in constitutional text. Members of the Founding generation would have
12 understood that the legislature could regulate the *conduct* protected by the Second
13 Amendment and comparable state arms bearing provisions as long as such
14 regulations did not destroy the underlying *right*.

15 17. John Burn, author of an influential eighteenth-century legal dictionary,
16 illustrated the concept of infringement in the context of his discussion of violations
17 of rights protected by the common law. Liberty, according to Burns, was not
18 identical to that “wild and savage liberty” of the state of nature. True liberty, by
19 contrast, only existed when individuals created civil society and enacted laws and
20 regulations that promoted *ordered* liberty.²⁵

21 ²⁴ The distinction emerges clearly in a discussion of natural law and the law
22 of nations in an influential treatise on international law much esteemed by the
23 Founding generation: “Princes who infringe the law of nations, commit as great a
24 crime as private people, who violate the law of nature,” J.J. BURLAMAQUI, *THE*
25 *PRINCIPLES OF NATURAL LAW* (Thomas Nugent trans., 1753) at 201. This book was
among those included in the list of important texts Congress needed to procure, *see*
Report on Books for Congress, [23 January] 1783,” *Founders Online*, National
Archives, <https://founders.archives.gov/documents/Madison/01-06-02-0031>.

26 ²⁵ *Liberty*, *A NEW LAW DICTIONARY* (1792) *See also*, Jud Campbell,
27 *Natural Rights, Positive Rights, and the Right to Keep and Bear Arms*, 83 *LAW &*
28 *CONTEMP. PROBS.* 31, 32–33 (2020)

1 18. Similarly, Nathan Bailey’s *Dictionarium Britannicum* (1730) defined
2 “abridge” as to “shorten,” while “infringe” was defined as to “break a law.”²⁶ And
3 his 1763 *New Universal Dictionary* repeats the definition of “abridge” as “shorten”
4 and “infringe” as “to break a law, custom, or privilege.”²⁷ Samuel Johnson’s
5 *Dictionary of the English Language* (1755) defines “infringe” as “to violate; to
6 break laws or contracts” or “to destroy; to hinder.”²⁸ Johnson’s definition of
7 “abridge” was “to shorten” and “to diminish” or “to deprive of.”²⁹ And Noah
8 Webster’s *An American Dictionary of the English Language* (1828) largely repeats
9 Johnson’s definitions of “infringe” and “abridge.”³⁰ Copies of these dictionary
10 entries are attached hereto as Exhibit 2. Although today the two terms are conflated
11 by some, the meanings of abridge and infringe were and remain distinct. The
12 Founding generation was far more nuanced in distinguishing between the
13 differences between these two terms.

14 19. Regulation, including robust laws, were not understood to be an
15 “infringement” of the right to bear arms, but rather the necessary foundation for the
16 proper exercise of that right as required by the concept of ordered liberty.³¹ As one

17 ²⁶ *Abridge*, DICTIONARIUM BRITANNICUM (1730).

18 ²⁷ *Abridge*, NEW UNIVERSAL DICTIONARY (1763).

19 ²⁸ *Infringe*, DICTIONARY OF THE ENGLISH LANGUAGE (1755).

20 ²⁹ *Abridge*, DICTIONARY OF THE ENGLISH LANGUAGE (1755).

21 ³⁰ *Abridge, Infringe*, AN AMERICAN DICTIONARY OF THE ENGLISH LANGUAGE
(1828).

22 ³¹ Dan Edelstein, *Early-Modern Rights Regimes: A Genealogy of*
23 *Revolutionary Rights*, 3 CRITICAL ANALYSIS L. 221, 233–34 (2016). *See generally*
24 GERALD LEONARD & SAUL CORNELL, *THE PARTISAN REPUBLIC: DEMOCRACY,*
25 *EXCLUSION, AND THE FALL OF THE FOUNDERS’ CONSTITUTION, 1780s–1830s*, at 2;
26 Victoria Kahn, *Early Modern Rights Talk*, 13 YALE J.L. & HUMAN. 391 (2001)
27 (discussing how the early modern language of rights incorporated aspects of natural
28 rights and other philosophical traditions); Joseph Postell, *Regulation During the*
American Founding: Achieving Liberalism and Republicanism, 5 AM. POL.
THOUGHT 80 (2016) (examining the importance of regulation to Founding political
and constitutional thought).

1 patriotic revolutionary era orator observed, almost a decade after the adoption of the
2 Constitution: “True liberty consists, not in having *no government*, not in a
3 *destitution of all law*, but in our having an equal voice in the formation and
4 execution of the laws, according as they effect [*sic*] our persons and property.”³²
5 By allowing individuals to participate in politics and enact laws aimed at promoting
6 the health, safety, and well-being of the people, liberty flourished.³³

7 20. The key insight derived from taking the Founding era conception of
8 rights seriously and applying the original understanding of the Founding era’s
9 conception of liberty is the recognition that regulation and liberty were not
10 antithetical to one another. The inclusion of rights guarantees in constitutional texts
11 was not meant to place them beyond the scope of legislative control. “The point of
12 retaining natural rights,” originalist scholar Jud Campbell reminds us “was not to
13 make certain aspects of natural liberty immune from governmental regulation.
14 Rather, retained natural rights were aspects of natural liberty that could be restricted
15 only with just cause and only with consent of the body politic.”³⁴ Rather than limit
16 rights, regulation was the essential means of preserving rights, including self-
17 defense.³⁵ In fact, without robust regulation of arms, it would have been impossible

18 ³² Joseph Russell, *An Oration; Pronounced in Princeton, Massachusetts, on*
19 *the Anniversary of American Independence, July 4, 1799*, at 7 (July 4, 1799), (text
20 available in the Evans Early American Imprint Collection) (emphasis in original).

21 ³³ See generally QUENTIN SKINNER, *LIBERTY BEFORE LIBERALISM* (1998)
22 (examining neo-Roman theories of free citizens and how it impacted the
23 development of political theory in England); THE NATURE OF RIGHTS AT THE
24 AMERICAN FOUNDING AND BEYOND (Barry Alan Shain ed., 2007) (discussing how
25 the Founding generation approached rights, including the republican model of
26 protecting rights by representation).

27 ³⁴ Jud Campbell, *The Invention of First Amendment Federalism*, 97 TEX. L.
28 REV. 517, 527 (2019) (emphasis in original). See generally Saul Cornell, *Half*
29 *Cocked: The Persistence of Anachronism and Presentism in the Academic Debate*
30 *Over the Second Amendment*, 106 J. OF CRIM. L. AND CRIMINOLOGY 203, 206
31 (2016) *s* (noting that the Second Amendment was not understood in terms of the
32 simple dichotomies that have shaped modern debate over the right to bear arms).

33 ³⁵ See Jud Campbell, *Judicial Review and the Enumeration of Rights*, 15

1 to implement the Second Amendment and its state analogues. Mustering the militia
2 required keeping track of who had weapons and included the authority to inspect
3 those weapons and fine individuals who failed to store them safely and keep them
4 in good working order.³⁶ The individual states also imposed loyalty oaths,
5 disarming those who refused to take such oaths. No state imposed a similar oath as
6 pre-requisite to the exercise of First Amendment-type liberties. Thus, some forms
7 of prior restraint, impermissible in the case of expressive freedoms protected by the
8 First Amendment or comparable state provisions, were understood by the Founding
9 generation to be perfectly consistent with the constitutional right to keep and bear
10 arms.³⁷

11 21. In keeping with the clear public meaning of the Second Amendment's
12 text and comparable state provisions, early American governments enacted laws to
13 preserve the rights of law-abiding citizens to keep and bear arms and promote the
14 equally vital goals of promoting public safety. As long as such laws did not destroy
15 the right of self-defense, the individual states enjoyed broad latitude to regulate
16 arms.³⁸

17 _____
18 GEO. J.L. & PUB. POL'Y 569, 576–77 (2017). Campbell's work is paradigm-
19 shifting, and it renders Justice Scalia's unsubstantiated claim in *Heller* that the
20 inclusion of the Second Amendment in the Bill of Rights placed certain forms of
21 regulation out of bounds totally anachronistic. This claim has no foundation in
22 Founding-era constitutional thought, but reflects the contentious modern debate
23 between Justice Black and Justice Frankfurter over judicial balancing, on Scalia's
24 debt to this modern debate, *see generally* SAUL CORNELL, THE POLICE POWER AND
25 THE AUTHORITY TO REGULATE FIREARMS IN EARLY AMERICA 1–2 (2021),
26 https://www.brennancenter.org/sites/default/files/2021-06/Cornell_final.pdf
27 [<https://perma.cc/J6QD-4YXG>] and Joseph Blocher, *Response: Rights as Trumps of*
28 *What?*, 132 HARV. L. REV. 120, 123 (2019).

36 H. RICHARD UVILLER & WILLIAM G. MERKEL, THE MILITIA AND THE
RIGHT TO ARMS, OR, HOW THE SECOND AMENDMENT FELL SILENT 150 (2002).

37 Saul Cornell, *Commonplace or Anachronism: The Standard Model, the*
Second Amendment, and the Problem of History in Contemporary Constitutional
Theory 16 CONSTITUTIONAL COMMENTARY 988 (1999).

38 Saul Cornell and Nathan DeDino, *A Well Regulated Right: The Early*

1 **II. FROM MUSKETS TO PISTOLS: CHANGE AND CONTINUITY IN EARLY**
2 **AMERICAN FIREARMS REGULATION**

3 22. Guns have been regulated from the dawn of American history.³⁹ At the
4 time *Heller* was decided, there was little scholarship on the history of gun
5 regulation and a paucity of quality scholarship on early American gun culture.⁴⁰
6 Fortunately, a burgeoning body of scholarship has illuminated both topics,
7 deepening scholarly understanding of the relevant contexts needed to implement
8 *Bruen*'s framework.⁴¹

9 23. The common law that Americans inherited from England always
10 acknowledged that the right of self-defense was not unlimited but existed within a
11 well-delineated jurisprudential framework. The entire body of the common law
12 was designed to preserve the peace.⁴² Statutory law, both in England and America
13 functioned to further secure the peace and public safety. Given these indisputable
14 facts, the Supreme Court correctly noted, the right to keep and bear arms was never
15 understood to prevent government from enacting a broad range of regulations to
16 promote the peace and maintain public safety.⁴³ To deny such an authority would
17 be to convert the Constitution into a suicide pact and not a charter of government.
18 In keeping with this principle, the Second Amendment and its state analogues were
19 understood to enhance the concept of ordered liberty, not undermine it.⁴⁴

20 _____
American Origins of Gun Control, 73 FORDHAM L. REV. 487 (2004).

21 ³⁹ Robert J. Spitzer, *Gun Law History in the United States and Second*
22 *Amendment Rights*, 80 L. & CONTEMP. PROBS. 55 (2017).

23 ⁴⁰ *Id.*

24 ⁴¹ Ruben & Miller, *supra* note 20, at 1.

25 ⁴² Saul Cornell, *The Right to Keep and Carry Arms in Anglo-American Law:*
Preserving Liberty and Keeping the Peace, 80 L. & CONTEMP. PROBS. 11 (2017).

26 ⁴³ *McDonald*, 561 U.S. at 785 (noting “[s]tate and local experimentation
27 with reasonable firearms regulations will continue under the Second
Amendment”).

28 ⁴⁴ See generally Saul Cornell, *The Long Arc Of Arms Regulation In Public:*

1 24. *Bruen*'s methodology requires judges to distinguish between the
2 relevant history necessary to understand early American constitutional texts and a
3 series of myths about guns and regulation that were created by later generations to
4 sell novels, movies, and guns themselves.⁴⁵ Unfortunately, many of these myths
5 continue to cloud legal discussions of American gun policy and Second
6 Amendment jurisprudence.⁴⁶

7 25. Although it is hard for many modern Americans to grasp, there was no
8 comparable societal ill to the modern gun violence problem for Americans to solve
9 in the era of the Second Amendment. A combination of factors, including the
10 nature of firearms technology and the realities of living life in small, face-to-face,
11 and mostly homogenous rural communities that typified many parts of early
12 America, militated against the development of such a problem. In contrast to
13 modern America, homicide was not the problem that government firearm policy
14 needed to address at the time of the Second Amendment.⁴⁷

15 26. The surviving data from New England is particularly rich and has
16 allowed scholars to formulate a much better understanding of the dynamics of early
17 American gun policy and relate it to early American gun culture.⁴⁸ Levels of gun

18 _____
19 *From Surety To Permitting*, 1328-1928, 55 U.C. DAVIS L. REV. 2547 (2022)

20 ⁴⁵ PAMELA HAAG, *THE GUNNING OF AMERICA: BUSINESS AND THE MAKING OF*
AMERICAN GUN CULTURE (2016).

21 ⁴⁶ RICHARD SLOTKIN, *GUNFIGHTER NATION: THE MYTH OF THE FRONTIER IN*
TWENTIETH-CENTURY AMERICA (1993); JOAN BURBICK, *GUN SHOW NATION: GUN*
22 *CULTURE AND AMERICAN DEMOCRACY* (2006).

23 ⁴⁷ RANDOLPH ROTH, *AMERICAN HOMICIDE* 56, 315 (2009).

24 ⁴⁸ It is important to recognize that there were profound regional differences in
25 early America. *See* JACK P. GREENE, *PURSUIITS OF HAPPINESS: THE SOCIAL*
DEVELOPMENT OF EARLY MODERN BRITISH COLONIES AND THE FORMATION OF
26 *AMERICAN CULTURE* (1988). These differences also had important consequences
27 for the evolution of American law. *See generally* David Thomas Konig,
Regionalism in Early American Law, in 1 *THE CAMBRIDGE HISTORY OF LAW IN*
AMERICA 144 (Michael Grossberg & Christopher Tomlins eds., 2008).

28

1 violence among those of white European ancestry in the era of the Second
2 Amendment were relatively low compared to modern America. These low levels of
3 violence among persons of European ancestry contrasted with the high levels of
4 violence involving the tribal populations of the region. The data presented in
5 Figure 1 is based on the pioneering research of Ohio State historian Randolph Roth.
6 It captures one of the essential facts necessary to understand what fears motivated
7 American gun policy in the era of the Second Amendment. The pressing problem
8 Americans faced at the time of the Second Amendment was that citizens were
9 reluctant to purchase military style weapons which were relatively expensive and
10 had little utility in a rural society. Americans were far better armed than their
11 British ancestors, but the guns most Americans owned and desired were those most
12 useful for life in an agrarian society: fowling pieces and light hunting muskets.⁴⁹
13 Killing pests and hunting birds were the main concern of farmers, and their choice
14 of firearm reflected these basic facts of life. Nobody bayoneted turkeys, and pistols
15 were of limited utility for anyone outside of a small elite group of wealthy,
16 powerful, and influential men who needed these weapons if they were forced to
17 face an opponent on the field of honor in a duel, as the tragic fate of Alexander
18 Hamilton so vividly illustrates.⁵⁰

19 27. Limits in Founding-era firearms technology also militated against the
20 use of guns as effective tools of interpersonal violence in this period. Eighteenth-
21 century muzzle-loading weapons, especially muskets, took too long to load and
22 were therefore seldom used to commit crimes. Nor was keeping guns loaded a
23 viable option because the black powder used in these weapons was not only

24 ⁴⁹ Kevin M. Sweeney, *Firearms Ownership and Militias in Seventeenth and*
25 *Eighteenth Century England and America*, in *A RIGHT TO BEAR ARMS?: THE*
26 *CONTESTED ROLE OF HISTORY IN CONTEMPORARY DEBATES ON THE SECOND*
AMENDMENT (Jennifer Tucker et al. eds., 2019).

27 ⁵⁰ Joanne B. Freeman, *AFFAIRS OF HONOR: NATIONAL POLITICS IN THE NEW*
28 *REPUBLIC* (2001).

1 corrosive, but it attracted moisture like a sponge. Indeed, the iconic image of rifles
 2 and muskets hung over the mantle place in early American homes was not primarily
 3 a function of aesthetics or the potent symbolism of the hearth, as many today
 4 assume. As historian Roth notes: “black powder’s hygroscopic, it absorbs water, it
 5 corrodes your barrel, you can’t keep it loaded. Why do they always show the gun
 6 over the fireplace? Because that’s the warmest, driest place in the house.”⁵¹
 7 Similar problems also limited the utility of muzzle-loading pistols as practical tools
 8 for self-defense or criminal offenses. Indeed, at the time of the Second
 9 Amendment, over 90% of the weapons owned by Americans were long guns, not
 10 pistols.⁵²

Figure 1

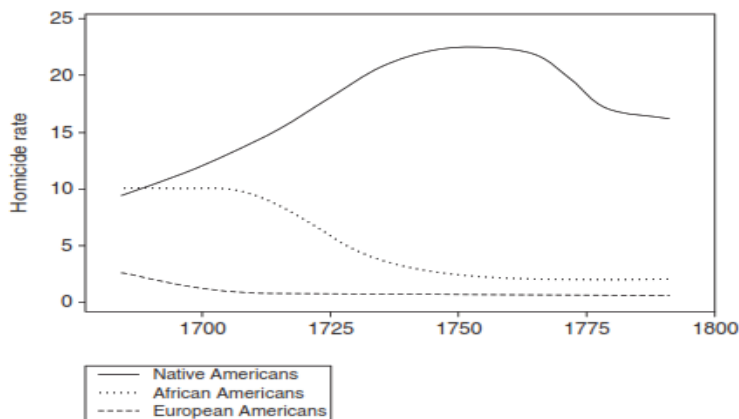


Figure 2.3 Unrelated-adult homicide rates in New England by race, 1677–1797 (per 100,000 persons per year).

22 28. As Roth’s data makes clear, there was not a serious homicide problem
 23 looming over debates about the Second Amendment. Nor were guns the primary
 24

25 ⁵¹ Randolph Roth, Transcript: *Why is the United States the Most Homicidal in*
 26 *the Affluent World*, NATIONAL INSTITUTE OF JUSTICE (Dec. 1, 2013),
 27 <https://nij.ojp.gov/media/video/24061#transcript--0>.

28 ⁵² Sweeney, *supra* note 49.

1 weapon of choice for those with evil intent during this period.⁵³ The skill and time
2 required to load and fire flintlock muzzle loading black powder weapons meant that
3 they were less likely to be used in crimes of passion. The preference for storing
4 them unloaded also meant they posed fewer dangers to children from accidental
5 discharge.

6 29. The Founding generation did not confront a gun violence problem
7 similar in nature or scope to the ills that plague modern America. The Founding
8 generation faced a different, but no less serious problem, American reluctance to
9 purchase the type of weapons needed to effectively arm their militias. Despite
10 repeated efforts to exhort and legislate to promote this goal, many states were
11 failing to adequately equip the militia with suitable firearms that could withstand
12 the rigors of the type of close-quarters hand-to-hand combat required by military
13 tactics. A gun had to be able to receive a bayonet and serve as a bludgeon if
14 necessary. The light weight guns favored by the overwhelmingly rural population
15 of early America were well designed to put food on the table and rid fields of
16 vermin, but were not well suited to eighteenth-century ground wars. When the U.S.
17 government surveyed the state of the militia's preparedness shortly after Jefferson
18 took office in 1800, the problem had not been solved. Although Massachusetts
19 boasted above 80% of its militia armed with military quality weapons, many of the
20 southern states lagged far behind, with Virginia and North Carolina hovering at
21 about less than half the militia properly armed.⁵⁴

22 30. Government policy, both at the state and federal level, responded to
23 these realities by requiring a subset of white citizens, those capable of bearing arms,
24 to acquire at their own expense a military quality musket and participate in
25 mandatory training and other martial activities. Gun policy in the Founding era
26

27 ⁵³ HAAG, *supra* note 45.

28 ⁵⁴ Sweeney, *supra* note 49.

1 reflected these realities, and accordingly, one must approach any analogies drawn
2 from this period’s regulations with some caution when applying them to a modern
3 heterogeneous industrial society capable of producing a bewildering assortment of
4 firearms whose lethality would have been almost unimaginable to the Founding
5 generation.⁵⁵ Put another way, laws created for a society without much of a gun
6 violence problem enacted at a time of relative gun scarcity, at least in terms of
7 militia weapons, have limited value in illuminating the challenges Americans face
8 today.

9 31. Another aspect of Founding era gun policy that needs to be
10 acknowledged is the active role that government took in encouraging the
11 manufacturing of arms. The American firearms industry in its infancy was largely
12 dependent on government contracts and subsidies. Thus, government had a vested
13 interest in determining what types of weapons would be produced. Government
14 regulation of the firearms industry also included the authority to inspect the
15 manufactures of weapons and impose safety standards on the industry.

16 32. As business historian Lindsay Schakenbach Regele notes, “by 1810,
17 western Massachusetts produced more small arms than anywhere else in the
18 Northeast.”⁵⁶ Beginning in 1794 the federal armory in Springfield, Massachusetts
19 served as a spur to technological innovation in the region. In the years following
20 the War of 1812, the Armory served as an incubator for other local producers and
21 gunsmiths, so much so that one Pittsfield gunsmith, Lemuel Pomeroy praised the
22 federal government for its actions which encouraged gunsmiths “to fabricate arms
23

24 ⁵⁵ Darrell A. H. Miller & Jennifer Tucker, *Common Use, Lineage, and*
25 *Lethality*, 55 U.C. DAVIS L. REV. 2495 (2022).

26 ⁵⁶ Lindsay Schakenbach Regele, *A Different Constitutionality for Gun*
27 *Regulation*, 46 HASTINGS CONST. L.O. 523, 524 (2019); Andrew J. B. Fagal,
28 *American Arms Manufacturing and the Onset of the War of 1812*, 87 NEW ENG. Q.
526, 526 (2014).

1 of the first quality.”⁵⁷ The Springfield Armory’s output accounted for most of the
2 guns produced in the state.

3 33. In 1805, Massachusetts enacted a law requiring all guns, before sale,
4 to be inspected, marked, and stamped by an inspector. The state revised the proof
5 statute two more times in the decades leading up to the Civil War.⁵⁸ These
6 requirements ensured that the guns sold to the public were safe and suitable for
7 use. Although the guns produced by the Springfield Armory were not subject to
8 state law, because they were under federal control, these arms were nonetheless
9 subjected to thorough testing and were stamped as well. Indeed, the fact that these
10 arms had undergone a rigorous testing and evaluation process became a major
11 selling point that was advertised to increase their value and desirability as surplus
12 military arms in the booming consumer market for guns that exploded in the
13 decades after the War of 1812.⁵⁹

14 34. The calculus of individual self-defense changed dramatically in the
15 decades following the adoption of the Second Amendment.⁶⁰ The early decades of
16 the nineteenth century witnessed a revolution in the production and marketing of
17 guns.⁶¹ The same technological changes and economic forces that made wooden
18

19 ⁵⁷ Lindsay Schakenbach Regele, *MANUFACTURING ADVANTAGE: WAR, THE STATE, AND THE ORIGINS OF AMERICAN INDUSTRY, 1776–1848* (2019) at 65-66.

20 ⁵⁸ 1805 Mass. Acts 588, An Act to Provide for the Proof of Fire Arms
21 Manufactured Within This Commonwealth, Ch. 35. A copy of this law is attached
22 hereto as Exhibit 3. The law was revised in 1837 and later in 1859, see Chap 49,
23 Sec. 27 (Firearms), General Statutes of the Commonwealth of Massachusetts:
Revised by Commissioners Appointed under a Resolve of February 16, 1855,
Amended by the Legislature, and Passed December 28, 1859 (1860).

24 ⁵⁹ Lindsay Schakenbach Regele, *Guns for the Government: Ordnance, the Military*
25 *‘Peacetime Establishment,’ and Executive Governance in the Early Republic*
34 *STUDIES IN AMERICAN POLITICAL DEVELOPMENT* 132, 145 (2020).

26 ⁶⁰ Cornell, *supra* note 3, at 745.

27 ⁶¹ Lindsay Schakenbach Regele, *Industrial Manifest Destiny: American*
28 *Firearms Manufacturing and Antebellum Expansion*, 93 *BUS. HIST. REV.* 57 (2018).

1 clocks and other consumer goods such as Currier and Ives prints common items in
2 many homes also transformed American gun culture.⁶² These same changes also
3 made handguns and a gruesome assortment of deadly knives, including the dreaded
4 Bowie knife, more common. The culmination of this gradual evolution in both
5 firearms and ammunition technology was the development of Samuel Colt's pistols
6 around the time of the Mexican-American War.⁶³ Economic transformation was
7 accompanied by a host of profound social changes that gave rise to America's first
8 gun violence crisis. As cheaper, more dependable, and easily concealable handguns
9 proliferated in large numbers, Americans, particularly southerners, began sporting
10 them with alarming regularity. The change in behavior was most noticeable in the
11 case of handguns.⁶⁴

12 35. The response of states to the emergence of new firearms that
13 threatened the peace was a plethora of new laws. In sort, when faced with changes
14 in technology, consumer behavior, and faced with novel threats to public safety, the
15 individual states enacted laws to address these problems. In every instance apart
16 from a few outlier cases in the Slave South, courts upheld such limits on the
17 unfettered exercise a right to keep and bear arms. The primary limit identified by
18 courts in evaluating such laws was the threshold question about abridgement: did
19 the law negate the ability to act in self-defense.⁶⁵ In keeping with the clear
20 imperative hard-wired into the Second Amendment, states singled out weapons that
21 posed a particular danger for regulation or prohibition. Responding in this fashion

22 _____
23 ⁶² Sean Wilentz, *Society, Politics, and the Market Revolution*, in *THE NEW AMERICAN HISTORY* (Eric Foner ed., 1990).

24 ⁶³ WILLIAM N. HOSLEY, *COLT: THE MAKING OF AN AMERICAN LEGEND* (1st
25 ed. 1996).

26 ⁶⁴ Cornell, *supra* note 3, at 716.

27 ⁶⁵ On southern gun rights exceptionalism, see Eric M. Ruben & Saul Cornell,
28 *Firearms Regionalism and Public Carry: Placing Southern Antebellum Case Law in Context*, 125 *YALE L.J. F.* 121, 128 (2015).

1 was entirely consistent with Founding-era conceptions of ordered liberty and the
2 Second Amendment.

3 36. Not all guns were treated equally by the law in early America. Some
4 guns were given heightened constitutional protection and others were treated as
5 ordinary property subject to the full force of state police power authority.⁶⁶ The
6 people themselves acting through their legislatures retained the fundamental right to
7 determine which dangerous weapons were exempted from the full protection of the
8 constitutional right to keep and bear arms. The antebellum case law examined by
9 *Heller* makes clear that the metric used by courts to evaluate laws was simple and
10 reflected the concept of infringement. Laws that undermined the right of self-
11 defense were generally struck down, regulations that limited but did not destroy the
12 right were upheld.⁶⁷

13 37. Some states opted to tax some common weapons to discourage their
14 proliferation.⁶⁸

15 ⁶⁶ Saul Cornell, *History and Tradition or Fantasy and Fiction: Which*
16 *Version of the Past Will the Supreme Court Choose in NYSRPA v. Bruen?*, 49
HASTINGS CONST. L.Q. 145 (2022).

17 ⁶⁷ The best illustration of this rule is *Reid*, discussed by *Heller* at 629.

18 ⁶⁸ 1858-1859 N.C. Sess. Laws 34-36, Pub. Laws, An Act Entitled Revenue,
19 chap. 25, § 27, pt. 15. (“The following subjects The following subjects shall be
20 annually listed, and be taxed the amounts specified: . . . Every dirk, bowie-knife,
21 pistol, sword-cane, dirk-cane and rifle cane, used or worn about the person of any
22 one at any time during the year, one dollar and twenty-five cents. Arms used for
23 mustering shall be exempt from taxation.”). Anderson Hutchinson, *Code of*
24 *Mississippi: Being an Analytical Compilation of the Public and General Statutes of*
25 *the Territory and State, with Tabular References to the Local and Private Acts, from*
26 *1798 to 1848 : With the National and State Constitutions, Cessions of the Country*
27 *by the Choctaw and Chickasaw Indians, and Acts of Congress for the Survey and*
Sale of the Lands, and Granting Donations Thereof to the State (1848) at 182. *See*
28 *also* 1866 Ga. Law 27, An Act to authorize the Justices of the Inferior Courts of
Camden, Glynn and Effingham counties to levy a special tax for county purposes,
and to regulate the same.

1 38. In particular not all hand guns were created equal in the eyes of the
2 law. During Reconstruction a number of states prohibited guns that were deemed
3 to pose a particular risk because they were easily concealed.⁶⁹

4 **III. THE POLICE POWER AND FIREARMS REGULATION**

5 39. The 1776 Pennsylvania Constitution, the first revolutionary
6 constitution to assert a right to bear arms, preceded the assertion of this right by
7 affirming a more basic rights claim: “That the people of this State have the sole,
8 exclusive and inherent right of governing and regulating the internal police of the
9 same.”⁷⁰ The phrase “internal police” had already become common, particularly in
10 laws establishing towns and defining the scope of their legislative authority.⁷¹ By
11 the early nineteenth century, the term “police” was a fixture in American law.⁷²
12 Thus, an 1832 American encyclopedia confidently asserted that police, “in the
13 common acceptance of the word, in the U. States and England, is applied to the
14 municipal rules, institutions and officers provided for maintaining order, cleanliness
15 &c.”⁷³ The Founding era’s conception of a basic police right located in legislatures

16 _____
17 ⁶⁹ 1879 Tenn. Pub. Acts 135-36, An Act to Prevent the Sale of Pistols, chap.
18 96, § 1; 1881 Ark. Acts 192, An Act to Preserve the Public Peace and Prevent
19 Crime, ch. XCVI (96), § 3.

20 ⁷⁰ PA. CONST. OF 1776, Ch. I, art iii.

21 ⁷¹ For other examples of constitutional language similar to Pennsylvania’s
22 provision, N.C. CONST. OF 1776, DECLARATION OF RIGHTS, art. II; VT. CONST. OF
23 1777, DECLARATION OF RIGHTS, art. IV. For other examples of this usage, *see* An
24 Act Incorporating the residents residing within limits therein mentioned, *in* 2 NEW
25 YORK LAWS 158 (1785) (establishing the town of Hudson, NY); An Act to
26 incorporate the Town of Marietta, *in* LAWS PASSED IN THE TERRITORY NORTHWEST
27 OF THE RIVER OHIO 29 (1791). For later examples, *see* 1 STATUTES OF THE STATE OF
28 NEW JERSEY 561 (rev. ed. 1847); 1 SUPPLEMENTS TO THE REVISED STATUTES. LAWS
OF THE COMMONWEALTH OF MASSACHUSETTS, PASSED SUBSEQUENTLY TO THE
REVISED STATUTES: 1836 TO 1849, INCLUSIVE 413 (Theron Metcalf & Luther S.
Cushing, eds. 1849).

⁷² ERNST FREUND, THE POLICE POWER: PUBLIC POLICY AND CONSTITUTIONAL
RIGHTS 2, n.2 (1904).

⁷³ 10 ENCYCLOPEDIA AMERICANA 214 new edition (Francis Lieber ed.).

1 was transmuted during the Marshall Court’s era into the judicial doctrine of the
2 police power and would become a fixture in American law.

3 40. The power to regulate firearms and gunpowder has always been
4 central to the police power and historically was shared among states, local
5 municipalities, and the federal government when it was legislating conduct on
6 federal land and in buildings.⁷⁴ The adoption of the Constitution and the Bill of
7 Rights did not deprive states of their police powers. Indeed, if it had, the
8 Constitution would not have been ratified and there would be no Second
9 Amendment today. Ratification was only possible because Federalists offered
10 Anti-Federalists strong assurances that nothing about the new government
11 threatened the traditional scope of the individual state’s police power authority,
12 including the authority to regulate guns and gun powder.⁷⁵

13 41. Federalists and Anti-Federalists bitterly disagreed over many legal
14 issues, but this one point of accord was incontrovertible. Brutus, a leading Anti-
15 Federalist, emphatically declared that “[I]t ought to be left to the state governments
16 to provide for the protection and defence [sic]of the citizen against the hand of
17 private violence, and the wrongs done or attempted by individuals to each other
18”⁷⁶ Federalist Tench Coxe concurred, asserting that: “[t]he states will regulate
19 and administer the criminal law, exclusively of Congress.” States, he assured the
20 American people during ratification, would continue to legislate on all matters
21 related to the police power “such as unlicensed public houses, nuisances, and many
22
23

24 ⁷⁴ Harry N. Scheiber, *State Police Power*, in 4 ENCYCLOPEDIA OF THE
25 AMERICAN CONSTITUTION 1744 (Leonard W. Levy et al. eds., 1986).

26 ⁷⁵ Saul Cornell, *THE OTHER FOUNDERS: ANTIFEDERALISM AND THE
27 DISSENTING TRADITION IN AMERICA, 1788-1828* (1999).

28 ⁷⁶ Brutus, *Essays of Brutus VII*, reprinted in 2 *THE COMPLETE
ANTIFEDERALIST* 358, 400–05 (Herbert J. Storing ed., 1981).

1 other things of the like nature.”⁷⁷ State police power authority was at its pinnacle in
2 matters relating to guns or gun powder.⁷⁸

3 42. Every aspect of the manufacture, sale, and storage of gun powder was
4 regulated due to the substance’s dangerous potential to detonate if exposed to fire or
5 heat. Firearms were also subject to a wide range of regulations, including laws
6 pertaining to the manufacture, sale, and storage of weapons.⁷⁹

7 43. Thus, Massachusetts enacted a law that prohibited storing a loaded
8 weapon in a home, a firearms safety law that recognized that the unintended
9 discharge of firearms posed a serious threat to life and limb.⁸⁰ New York City even
10 granted broad power to the government to search for gun powder and transfer
11 powder to the public magazine for safe storage:

12 it shall and may be lawful for the mayor or recorder, or any two
13 Alderman of the said city, upon application made by any inhabitant or
14 inhabitants of the said city, and upon his or their making oath of
15 reasonable cause of suspicion (of the sufficiency of which the said
16 mayor or recorder, or Aldermen, is and are to be the judge or judges)
17 to issue his or their warrant or warrants, under his or their hand and
18 seal, or hands and seals for searching for such gun powder, in the day
19 time, in any building or place whatsoever.⁸¹

19 ⁷⁷ Tench Coxe, A Freeman, *Pa. Gazette*, Jan. 23, 1788, reprinted in FRIENDS
20 OF THE CONSTITUTION: WRITINGS OF THE “OTHER” FEDERALISTS 82 (Colleen A.
21 Sheehan & Gary L. McDowell eds., 1998).

21 ⁷⁸ CORNELL, *supra* note 35.

22 ⁷⁹ Cornell and DeDino, *supra* note 38; public carry by contrast was limited
23 by common law and criminal statutes, see, Cornell, *supra* note 42.

24 ⁸⁰ Act of Mar. 1, 1783, ch. XIII, 1783 Mass. Acts 37, An Act in Addition to
25 the Several Acts Already Made for the Prudent Storage of Gun Powder within the
26 Town of Boston, § 2. A copy of this law is attached hereto as Exhibit 4.

27 ⁸¹ An Act to Prevent the Storing of Gun Powder, within in Certain Parts of
28 New York City, 2 LAWS OF THE STATE OF NEW-YORK, COMPRISING THE
CONSTITUTION, AND THE ACTS OF THE LEGISLATURE, SINCE THE REVOLUTION,
FROM THE FIRST TO THE FIFTEENTH SESSION, INCLUSIVE at 191-2 (Thomas
Greenleaf, ed., 1792). A copy of this law is attached hereto as Exhibit 5.

1 44. The power to regulate firearms and gunpowder was therefore at the
2 very core of the police power and inheres in both states and local municipalities.
3 The application of the police power to firearms and ammunition was singled out as
4 the quintessential example of state police power by Chief Justice John Marshall in
5 his 1827 discussion of laws regulating gun powder in *Brown v. Maryland*.⁸² This
6 was so even though gunpowder was essential to the operation of firearms at that
7 time and gun powder regulations necessarily affected the ability of gun owners to
8 use firearms for self-defense, even inside the home.

9 45. A slow process of judicializing this concept of police, transforming the
10 Founding era's idea of a "police right" into a judicially enforceable concept of the
11 "police power" occurred beginning with the Marshall Court and continuing with the
12 Taney Court.⁸³

13 46. Nor was Chief Justice John Marshall unique in highlighting the
14 centrality of this idea to American law.⁸⁴ The ubiquity of the police power
15 framework for evaluating the constitutionality of legislation regarding firearms
16 reflected the centrality of this approach to nearly every question of municipal
17

18 ⁸² 25 U.S. (12 Wheat.) 419, 442-43 (1827) ("The power to direct the removal
19 of gunpowder is a branch of the police power").

20 ⁸³ Eras of Supreme Court history are typically defined by the tenure of the
21 Chief Justice. The Marshall Court Period covered the years 1801-1835. For a brief
22 overview, see "The Marshall Court, 1801-1835", SUPREME COURT HISTORICAL
23 SOCIETY (last visited Oct. 5, 2022), [https://supremecourthistory.org/history-of-the-court-history-of-the-courts-the-marshall-court-1801-1835/](https://supremecourthistory.org/history-of-the-court-history-of-the-courts/history-of-the-court-history-of-the-courts-the-marshall-court-1801-1835/). The Taney Court period covered the years 1836-1864. See "The
24 Taney Court, 1836-1864", SUPREME COURT HISTORICAL SOCIETY (last visited Oct.
25 5, 2022), [https://supremecourthistory.org/history-of-the-court-history-of-the-courts-history-of-the-courts-the-taney-court-1836-1864/](https://supremecourthistory.org/history-of-the-court-history-of-the-courts/history-of-the-courts-history-of-the-courts-the-taney-court-1836-1864/).

26 ⁸⁴ In the extensive notes he added as editor of the 12th edition of James Kent's
27 classic *Commentaries an American Law*, Oliver Wendell Holmes, Jr., wrote that
28 regulation of firearms was the *locus classicus* of the police power. See 2 JAMES
KENT COMMENTARIES ON AMERICAN LAW (340) 464 n.2 (Oliver Wendell Holmes,
Jr., ed. 12 ed. 1873).

1 legislation touching health or public safety in early America.⁸⁵ Massachusetts
2 Judge Lemuel Shaw, one of the most celebrated state jurists of the pre-Civil War era
3 elaborated this point in his influential 1851 opinion in *Commonwealth v. Alger*, a
4 decision that became a foundational text for lawyers, judges, and legislators looking
5 for guidance on the meaning and scope of the police power. Shaw described the
6 police power in the following manner:

7 [T]he power vested in the legislature by the constitution, to make,
8 ordain and establish all manner of wholesome and reasonable laws,
9 statutes and ordinances, either with penalties or without, not
10 repugnant to the constitution, as they shall judge to be for the good
11 and welfare of the commonwealth, and of the subjects of the same.
12 It is much easier to perceive and realize the existence and sources
13 of this power, than to mark its boundaries, or prescribe limits to its
14 exercise. There are many cases in which such a power is exercised
15 by all well-ordered governments, and where its fitness is so
16 obvious, that all well regulated minds will regard it as reasonable.
17 Such are the laws to prohibit the use of warehouses for the storage
18 of gunpowder.⁸⁶

14 47. In short, there was unanimous agreement among leading antebellum
15 jurists, at both the federal and state level, that the regulation of arms and gun
16 powder was at the core of the police power enjoyed by legislatures. Indeed, the
17 scope of government power to regulate, prohibit, and inspect gunpowder has been
18 among the most far reaching of any exercise of the police power throughout
19

21
22 ⁸⁵ FREUND, *supra* note 72, at 2, n.2 (1904). WILLIAM J. NOVAK, *THE PEOPLE'S*
23 *WELFARE: LAW AND REGULATION IN NINETEENTH-CENTURY AMERICA* (1996);
24 Christopher Tomlins, *To Improve the State and Condition of Man: The Power to*
25 *Police and the History of American Governance*, 53 *BUFF. L. REV.* 1215 (2005);
26 DUBBER, *supra* note 12; GARY GERSTLE, *LIBERTY AND COERCION: THE PARADOX OF*
27 *AMERICAN GOVERNMENT, FROM THE FOUNDING TO THE PRESENT* (Princeton Univ.
28 Press, 2015).

26 ⁸⁶ *Commonwealth v. Alger*, 61 Mass. (7 Cush.) 53 (1851). For another good
27 discussion of how state jurisprudence treated the concept, see *Thorpe v. Rutland*, 27
28 Vt. 140, 149 (1855).

1 American history.⁸⁷ A Maine law enacted in 1821 authorized town officials to enter
2 any building in town to search for gun powder:

3 Be it further enacted, That it shall, and may be lawful for any one or
4 more of the selectmen of any town to enter any building, or other
5 place, in such town, to search for gun powder, which they may have
6 reason to suppose to be concealed or kept, contrary to the rules and
7 regulations which shall be established in such town, according to the
provisions of this Act, first having obtained a search warrant therefore
according to law.⁸⁸

8 48. No jurisdiction enumerated the full contours of the police power they
9 possessed in a single text or in a single statute or ordinance. Rather, it was well
10 understood that the exercise of this power would need to adapt to changing
11 circumstances and new challenges as they emerged. This conception of law was
12 familiar to most early American lawyers and judges who had been schooled in
13 common law modes of thinking and analysis.⁸⁹ Throughout the long sweep of
14 Anglo-American legal history, government applications of the police power were
15 marked by flexibility, allowing local communities to adapt to changing
16 circumstances and craft appropriate legislation to deal with the shifting challenges
17 they faced.⁹⁰ This vision of the police power was articulated forcefully by the
18 Supreme Court in the License Cases when Justice McClean wrote this about the
19 scope of state police power:

20 It is not susceptible of an exact limitation, but must be exercised under
21 the changing exigencies of society. In the progress of population, of
22 wealth, and of civilization, new and vicious indulgences spring up, which
require restraints that can only be imposed by new legislative power.

23 ⁸⁷ CORNELL, THE POLICE POWER, *supra* note 35.

24 ⁸⁸ 1821 Me. Laws 98, An Act for the Prevention of Damage by Fire, and the
25 Safe Keeping of Gun Powder, chap. 25, § 5. A copy of this law is attached hereto
as Exhibit 6.

26 ⁸⁹ KUNAL M. PARKER, COMMON LAW HISTORY, AND DEMOCRACY IN
27 AMERICA, 190-1900: LEGAL THOUGHT BEFORE MODERNISM (2013).

28 ⁹⁰ William J. Novak, *A State of Legislatures*, 40 POLITY 340 (2008).

1 of the connection between these two formerly distinct rights, fusing the two
2 together as one single constitutional principle. This change reflected two profound
3 transformations in American politics and law between 1776 and 1868. First, the
4 judicial concept of police power gradually usurped the older notion of a police right
5 grounded in the idea of popular sovereignty. As a result, state constitutions no
6 longer included positive affirmations of a police right. Secondly, the constitutional
7 “mischief to be remedied” had changed as well.⁹⁵ Constitution writers in the era of
8 the American Revolution feared powerful standing armies and sought to entrench
9 civilian control of the military. By contrast, constitution writers in the era of the
10 Fourteenth Amendment were no longer haunted by the specter of tyrannical Stuart
11 Kings using their standing army to oppress American colonists. In place of these
12 ancient fears, a new apprehension stalked Americans: the proliferation of
13 especially dangerous weapons and the societal harms they caused.⁹⁶

14 51. The new language state constitutions employed to describe the right to
15 bear arms enacted during Reconstruction responded to these changed circumstances
16 by adopting a new formulation of the venerable right codified in 1776, linking the
17 right to bear arms inextricably with the states broad police power to regulate
18 conduct to promote health and public safety.⁹⁷ For example, the 1868 Texas

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20 ⁹⁵ The mischief rule was first advanced in *Heydon’s Case*, (1584) 76 Eng.
21 Rep. 637 (KB) — the legal principle that the meaning of a legal text was shaped by
22 an understanding of the state of the common law prior to its enactment and the
23 mischief that the common law had failed to address and legislation had intended to
24 remedy — continued to shape Anglo-American views of statutory construction, and
25 legal interpretation more generally, well into the nineteenth century. For
26 Blackstone’s articulation of the rule, see 1 BLACKSTONE, *supra* note 8, at *61. The
27 relevance of common law modes of statutory construction to interpreting
28 antebellum law, including the mischief rule, is clearly articulated in 1 ZEPHANIAH
SWIFT, A DIGEST OF THE LAWS OF THE STATE OF CONNECTICUT 11 (New Haven, S.
Converse 1822). For a modern scholarly discussion of the rule, see Samuel L.
Bray, *The Mischief Rule*, 109 GEO. L.J. 967, 970 (2021).

⁹⁶ See *McDonald*, 561 U.S. at 767–68

⁹⁷ Saul Cornell, *The Right to Regulate Arms in the Era of the Fourteenth*

1 Constitution included new language that underscored the indissoluble connection
2 that Anglo-American law had long recognized between the right to keep and bear
3 arms and regulation of guns. “Every person shall have the right to keep and bear
4 arms, in the lawful defence of himself or the government, under such regulations as
5 the Legislature may prescribe.”⁹⁸ Nor was Texas an outlier in this regard. Sixteen
6 state constitutions adopted during this period employed similarly expansive
7 language.⁹⁹ Millions of Americans living in the newly organized western states and
8 newly reconstructed states of the former confederacy adopted constitutional
9 provisions that reflected this new formulation of the right to bear arms. Thus,
10 millions of Americans were living under constitutional regimes that acknowledged
11 that the individual states’ police power authority over firearms was at its apogee
12 when regulating guns.¹⁰⁰

13 52. This expansion of regulation was entirely consistent with the
14 Fourteenth Amendment’s emphasis on the protection of rights and the need to
15 regulate conduct that threatened the hard-won freedoms of recently free people of
16 the South and their Republican allies. The goals of Reconstruction were therefore
17 intimately tied to the passage and enforcement of racially neutral gun regulations.¹⁰¹

18 _____
19 *Amendment: The Emergence of Good Cause Permit Schemes in Post-Civil War*
America, 55 U.C. DAVIS L. REV. 65 (2022).

20 ⁹⁸ TEX. CONST. OF 1868, Art. I, § 13; for similarly expansive constitutional
21 provision enacted after the Civil War, *see* IDAHO CONST. OF 1889, art. I, § 11 (“The
22 people have the right to bear arms for their security and defense; but the legislature
23 shall regulate the exercise of this right by law.”); UTAH CONST OF 1896, art. I, § 6
24 (“[T]he people have the right to bear arms for their security and defense, but the
25 legislature may regulate the exercise of this right by law.”).

26 ⁹⁹ Cornell, *supra* note 97, at 75–76.

27 ¹⁰⁰ *Id.*

28 ¹⁰¹ ERIC FONER, THE SECOND FOUNDING: HOW THE CIVIL WAR AND
RECONSTRUCTION REMADE THE CONSTITUTION (2019); Brennan Gardner Rivas,
Enforcement of Public Carry Restrictions: Texas as a Case Study, 55 U.C. DAVIS L.
REV. 2603 (2022).

1 53. Reconstruction ushered in profound changes in American law, but it
2 did not fundamentally alter the antebellum legal view that a states' police powers
3 were rooted in the people's right to make laws to protect the peace and promote
4 public safety. Nor did Reconstruction challenge the notion that these powers were
5 at their zenith when dealing with guns and gun powder. In fact, the Republicans
6 who wrote the Fourteenth Amendment were among the most ardent champions of
7 an expansive view of state police power. As heirs to the antebellum Whig vision of
8 a well-regulated society, Reconstruction-era Republicans used government power
9 aggressively to protect the rights of recently freed slaves and promote their vision
10 of ordered liberty.¹⁰²

11 54. Indeed, the passage of the Fourteenth Amendment was premised on the
12 notion that the individual states would not lose their police power authority to the
13 federal government. The author of Section One of the Fourteenth Amendment,
14 John Bingham, reassured voters that the states would continue to bear the primary
15 responsibility for "local administration and personal security."¹⁰³ As long as state
16 and local laws were racially neutral and favored no person over any other, the
17 people themselves, acting through their representatives, were free to enact
18 reasonable measures necessary to promote public safety and further the common
19 good.¹⁰⁴

20 _____
21 ¹⁰² Robert J. Kaczorowski, *Congress's Power to Enforce Fourteenth*
22 *Amendment Rights: Lessons from Federal Remedies the Framers Enacted*, 42
23 *HARV. J. ON LEGIS.* 187 (2005); Christopher Tomlins, *To Improve the State and*
Condition of Man: The Power to Police and the History of American Governance
53 *BUFFALO L. REV.* 1215 (2005/2006).

24 ¹⁰³ John Bingham, *Speech*, *CINCINNATI DAILY GAZETTE* (Sept. 2, 1867), as
25 quoted in Saul Cornell and Justin Florence, *The Right to Bear Arms in the Era of*
the Fourteenth Amendment: Gun Rights or Gun Regulation, 50 *SANTA CLARA L.*
REV. 1043, 1058 (2010).

26 ¹⁰⁴ For a discussion of how the courts wrestled with the meaning of the
27 Amendment, see WILLIAM E. NELSON, *THE FOURTEENTH AMENDMENT: FROM*
POLITICAL PRINCIPLE TO JUDICIAL DOCTRINE (1998).

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1 55. It would be difficult to understate the impact of this new paradigm for
2 gun regulation on post-Civil War legislation. Across the nation legislatures took
3 advantage of the new formulation of the right to bear arms included in state
4 constitutions and enacted a staggering range of new laws to regulate arms. Indeed,
5 the number of laws enacted skyrocketed, increasing by over four hundred percent
6 from antebellum levels.¹⁰⁵ Not only did the number of laws increase, but the
7 number of states and localities passing such laws also expanded.¹⁰⁶

8 56. Henry Campbell Black, the author of *Black's Law Dictionary*,
9 described the police power as “inalienable” and echoed the view of a long line of
10 jurists who noted that the scope of the power was not easily defined and the
11 determination of its limits was best left to courts on a case-by-case basis.¹⁰⁷ Indeed,
12 even the most ardent critics of the police power, such as conservative legal scholar
13 Christopher G. Tiedeman, acknowledged that “police power of the State extends to
14 the protection of the lives, limbs, health, comfort and quiet of all persons, and the
15 protection of all property within the State.”¹⁰⁸

16 57. In keeping with the larger goals of Reconstruction, Republicans sought
17 to protect the rights of African Americans to bear arms but were equally insistent on
18 enacting strong racially neutral regulations aimed at public safety. Violence
19 directed against African Americans, particularly the campaign of terror orchestrated
20 by white supremacist para-military groups prompted Republican dominated
21 legislatures in the Reconstruction South to pass a range of racially neutral gun
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23 ¹⁰⁵ See Spitzer, *supra* note 39, at 59–61 tbl. 1.

24 ¹⁰⁶ *Id.*

25 ¹⁰⁷ HENRY CAMPBELL BLACK, HANDBOOK OF CONSTITUTIONAL LAW, 334–344
(2d ed., 1897).

26 ¹⁰⁸ CHRISTOPHER G. TIEDEMAN, A TREATISE ON THE LIMITATIONS OF THE
27 POLICE POWER IN THE UNITED STATES 4–5 (1886) (citing *Thorpe v. Rutland R.R.*, 27
28 Vt. 140, 149–50 (1854)).

1 regulations.¹⁰⁹ The racially neutral gun laws enacted by Republicans were in part a
2 reaction to the discriminatory black codes passed by neo-confederate legislatures
3 earlier in Reconstruction. The Black Codes violated the Second Amendment, but
4 the wave of firearms legislation passed by Republican controlled state legislatures
5 in the South were consciously crafted to honor the Second Amendment and protect
6 individuals from gun violence.¹¹⁰

7 58. The laws enacted during Reconstruction underscore the fact that robust
8 regulation of firearms during Reconstruction was not a novel application of the
9 police power, but an expansion and continuation of antebellum practices. Moreover,
10 these efforts illustrated a point beyond dispute: the flexibility inherent in police
11 power regulations of guns. American states had regulated arms since the dawn of
12 the republic and Reconstruction simply renewed America's commitment to the idea
13 of well-regulated liberty.

14 **V. BRUEN'S FRAMEWORK AND THE SCOPE OF PERMISSIBLE REGULATION**

15 59. The power to regulate and in some cases prohibit guns and gun powder
16 has always been central to the police power authority of states and localities. At
17 different moments in American history communities have regulated weapons. As
18 the Second Amendment's text makes clear, weapons that undermine the security of
19 a free state are not within the scope of its protections. In short, social, and
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22 ¹⁰⁹ Mark Anthony Frassetto, *The Law and Politics of Firearms Regulation in*
23 *Reconstruction Texas*, 4 TEX. A&M L. REV. 95, 113–17 (2016); Brennan G. Rivas,
24 *An Unequal Right to Bear Arms: State Weapons Laws and White Supremacy in*
Texas, 1836-1900, 121 SOUTHWESTERN QUARTERLY 284 (2020).

25 ¹¹⁰ See Darrell A. H. Miller, *Peruta, The Home-Bound Second Amendment,*
26 *and Fractal Originalism*, 127 HARV. L. REV. 238, 241 (2014); see also Robert J.
27 Kaczorowski, *Congress's Power to Enforce Fourteenth Amendment Rights:*
28 *Lessons from Federal Remedies the Framers Enacted*, 42 HARV. J. ON LEGIS. 187,
205 (2005) (discussing Republican use of federal power to further their aims,
including to enforce the Fourteenth Amendment).

1 economic transformation were always accompanied by legal transformation. Put
2 another way, as times change, the law changes with them.¹¹¹

3 60. Political scientist Robert Spitzer’s overview of the history of firearms
4 regulation underscores a basic point about American law: “The lesson of gun
5 regulation history here is that new technologies bred new laws when circumstances
6 warranted.”¹¹² States and localities have regulated gunpowder and arms, since the
7 earliest days of the American Republic. The statutes at issue in this case are
8 analogous to a long-established tradition of firearms regulation in America,
9 beginning in the colonial period and stretching across time to the present. This
10 venerable tradition of using police power authority to craft specific laws to meet
11 shifting challenges has continued to the present day.¹¹³ The adaptability of state
12 and local police power provided the flexibility governments needed to deal with the
13 problems created by changes in firearms technology and gun culture.

14 61. The metric used by courts to adjudicate questions about the scope of
15 permissible regulation has remain constant over the long arc of American history.
16 To constitute an infringement of the right the law must burden the right of self-
17 defense to such a degree that it effectively negates it. As long as laws stay within
18 this threshold they have been held to be constitutional.

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¹¹¹ Spitzer, *supra* note 37.

¹¹² *Id.*

¹¹³ GERSTLE, *supra* note 85.

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

2 Executed on January 27, 2023 at Redding, CT.

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Saul Cornell

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Saul Cornell

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Exhibit 1

Saul Cornell

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Education			
1989	University of Pennsylvania	Ph.D.	Dissertation: "The Political Thought and Culture of the Anti-Federalists"
1985	University of Pennsylvania	MA	History
1982	Amherst College	BA	History - Magna Cum Laude
1980-81	University of Sussex, Brighton, England		

Teaching Experience		
2009-2020	Guenther Chair in American History	Fordham University
2011-2022	Adjunct Professor of Law	Fordham Law School
2005-2008	Professor of History	The Ohio State University
1997-2005	Associate Professor, History	The Ohio State University
1995	Thomas Jefferson Chair	University of Leiden, The Netherlands
1991-1997	Assistant Professor, History	The Ohio State University
1989-1991	Assistant Professor, History	College of William and Mary

Fellowships and Grants

- 2019-2020 The Gilder Lehrman Center for the Study of Slavery, Resistance, and Abolition, Yale University
- 2018-2019 Senior Research Scholar in Residence, Floersheimer Center for Constitutional Democracy, Cardozo Law School
- 2014 Senior Research Scholar in Residence, University of Connecticut Law School
- 2011 Senior Research Scholar in Residence, Yale Law School
- 2003-2008 Joyce Foundation, Second Amendment Center Grant, \$575,000
- 2003-2004 NEH Fellowship
- 2002-2005 Department of Education, Teaching American History Grant, Historyworks, \$2,000,000
- 2002 Gilder-Lehrman Fellowship
- 2001-2002 Joyce Foundation Planning Grant, \$40,000
- 2001 American Council of Learned Societies (ACLS)
- 1999-2000 Betha Grant, Batelle Memorial Endowment, Ohio Teaching Institute, \$100,000
- 1998 Thomas Jefferson Memorial Foundation, Research Fellowship
- 1995 Thomas Jefferson Chair in American Studies, Fulbright Lecturing Award
- 1994 Ohio State University Seed Grant
- 1993 Ohio State University Special Research Assignment
- 1992 Ohio State University Grant-In-Aid
- 1989-1991 NEH Post-Doctoral Fellow, Institute of Early American History and Culture

Prizes and Awards

- 2006 Langum Prize in Legal History 2006
- 2006 History News Network, Book of the Month
- 2006 History News Network, Top Young Historian
- 2001 Society of the Cincinnati, History Book Prize, a Triennial Award for the Best Book on the American Revolutionary Era
- 2000 Choice Outstanding Academic Book

Book Publications

The Partisan Republic: Democracy, Exclusion, and the Fall of the Founders Constitution
New Histories of American Law, series eds., Michael Grossberg and Christopher Tomlins (Cambridge University Press, 2019) [With Gerald Leonard]

The Second Amendment On Trial: Critical Essays on District of Columbia v. Heller
(University of Massachusetts Press, 2013) [with Nathan Kozuskanich]

Visions of America: A History of the United States [co-authored with Jennifer Keene and Ed O'Donnell]
(First edition, 2009),(second edition 2013) (third edition, 2016)

"A Well Regulated Militia": The Founding Fathers and the Origins of Gun Control (Oxford University Press, 2006) (paperback edition 2008)

Whose Right to Bear Arms Did the Second Amendment Protect? (Bedford/St. Martins Press, 2000)
(Paperback 2000)

The Other Founders: Anti-Federalism and the Dissenting Tradition in America, 1788-1828 (Institute of Early American History and Culture, University of North Carolina Press, 1999) (paperback edition 2001)

Editor, Retrieving the American Past: Documents and Essays on American History, (Pearson, 1994-2008)

Scholarly Articles, Book Chapters, and Essays:

"History and Tradition or Fantasy and Fiction: Which Version of the Past Will the Supreme Court Choose in *NYSRPA v. Bruen?*," 49 *Hastings Constitutional Law Quarterly* (2022): 145-177.

"The Long Arc of Arms Regulation in Public: From Surety to Permitting, 1328–1928," 55 *University of California, Davis Law Review* (2022): 2545-2602

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- “Reading the Constitution, 1787–91: History, Originalism, and Constitutional Meaning.” Law and History Review 37 (2019): 821–45
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- “Commonplace or Anachronism: The Standard Model, The Second Amendment, and the Problem of History in Contemporary Constitutional Theory,” Constitutional Commentary (1999): 221-246
- “Mere Parchment Barriers? Anti-Federalists, the Bill of Rights, and the Question of Rights Consciousness,” in Government Proscribed: The Bill of Rights (University of Virginia Press, 1998): 175-208

- “Moving Beyond the Great Story: Post-Modern Prospects, Post-Modern Problems, A Forum on Robert Berkhofer, Jr. Beyond the Great Story” American Quarterly (1998): 349-357
- “The Anti-Federalists,” in The Blackwell Companion to American Thought, eds., James Kloppenberg (London, 1995)
- “The Bill of Rights,” in The Blackwell Companion to American Thought, eds., James Kloppenberg (London, 1995)
- “Splitting the Difference: Textualism, Contextualism, and Post-Modern History,” American Studies (1995): 57-80
- “Canon Wars II: The Return of the Founders,” Reviews in American History 22 (1994): 413-417
- “Moving Beyond the Canon of Traditional Constitutional History: Anti-Federalists, the Bill of Rights and the Promise of Post-Modern Historiography,” Law and History Review (1994): 1-28
- “Early American History in a Post-Modern Age,” William and Mary Quarterly 50 (1993): 329-341
- “Liberal Republicans, Republican Liberals?: The Political Thought of the Founders Reconsidered,” Reviews in American History 21 (1993): 26-30
- “Politics of the Middling Sort: The Bourgeois Radicalism of Abraham Yates, Melancton Smith, and the New York Anti-Federalists,” in New York in the Age of the Constitution (New York Historical Society, 1992): 151-175
- “Aristocracy Assailed: Back-Country Opposition to the Constitution and the Problem of Anti-Federalist Ideology,” Journal of American History (1990): 1148-1172
- “The Changing Historical Fortunes of the Anti-Federalists,” Northwestern University Law Review (1989): 39-73
- “Reflections on the ‘Late Remarkable Revolution in Government,’ Aedanus Burke and Samuel Bryan’s Unpublished History of the Ratification of the Federal Constitution,” The Pennsylvania Magazine of History and Biography (1988): 103-130

Book Reviews:

- Journal of American History
- William and Mary Quarterly
- American Studies Journal of the Early Republic
- Pennsylvania Magazine of History and Biography
- American Quarterly
- American Journal of Legal History
- Law and History Review

Journal Manuscript Referee:

- Journal of American History
- William and Mary Quarterly
- Diplomatic History
- Pennsylvania Magazine of History and Biography
- Law and History Review
- Harvard Law Review

- Stanford Law Review
- Yale Law Journal

Book Manuscript Reviewer:

- University Press of Virginia
- University of North Carolina Press
- Stanford University Press
- University of Massachusetts Press
- Oxford University Press
- Cambridge University Press
- University of Michigan Press
- Harvard University Press

Invited Lectures:

“Race, Regulation, and Guns: The Battleground in the Debate Over the Second Amendment,”
Haber/Edelman Lecture: University of Vermont, Fall 2021

“Second Amendment Myths and Realities,” University of Tampa, Honors College Symposium,
November 30, 2018.

“The Common Law and Gun Regulation: Neglected Aspects of the Second Amendment Debate,” Guns
in Law, Amherst College, Law Justice and Society (2016)

“The New Movement to End Gun Violence.” UCLA Hammer Museum (2016)

“No Person May Go Armed”: A Forgotten Chapter in the History of Gun Regulation” The Elizabeth
Battelle Clark Legal History Series, Boston University College of Law, 2016

Legacy Speaker Series: “Guns in the United States,” University of Connecticut (2016) “How does the
Second Amendment Apply to Today?”

American Constitution Society/ Federalist Society Debate, Tulane Law School, New Orleans (2016)

“The Second Amendment and The Future of Gun Regulation: Forgotten Lessons From U.S. History,”
Constitution Day Lecture, Goucher College, (2015)

Keynote Lecture: “The Second Amendment and American Cultural Anxieties: From Standing Armies to
the Zombie Apocalypse” Firearms and Freedom: The Relevance of the Second Amendment in the
Twenty First Century, Eccles Center, British Library (Spring 2015)

“Narratives of Fear and Narratives of Freedom: A Short Cultural History of the Second Amendment,”
Comparing Civil Gun Cultures: Do Emotions Make a Difference? Max Plank Institute, Berlin (2014)

“History and Mythology in the Second Amendment Debate,” Kollman Memorial Lecture, Cornell
College, Iowa (Spring, 2013)

“Will the Real Founding Fathers Please Stand Up or Why are so few Historians Originalists”
Constitution Day Lecture, Lehman College, Fall 2011

“Lawyers, Guns, and Historians: The Second Amendment Goes to Court,” SHEAR/HSP Public Lecture,
Philadelphia, July, 2008

The Robert H. and Alma J. Wade Endowment Lecture, Kentucky Wesleyan University, “The Early American Origins of Gun Control” (2006)

“Jefferson, Mason, and Beccaria: Three Visions of the Right to Bear Arms in the Founding Era,” Bill of Rights Lecture, Gunston Hall Plantation, Fairfax, VA (2003)

“A New Paradigm for the Second Amendment,” Finlay Memorial Lecture, George Mason University, (2001)

“Academic Gunsmoke: The Use and Abuse of History in the Second Amendment Debate,” Cadenhead Memorial Lecture, University of Tulsa, (2000)

“Why the Losers Won: The Rediscovery of Anti-Federalism in the Reagan Years,” Thomas Jefferson Inaugural Lecture, University of Leiden, Netherlands, (1995)

Presentations:

“From Ideology to Empiricism: Second Amendment Scholarship After Heller,” Hastings Constitutional Law Quarterly Symposium, Heller at Ten, January 18, 2019

“Firearms and the Common Law Tradition,” Aspen Institute, Washington, DC (2016)

“The Original Debate over Original Meaning Revisited,” British Group in Early American History, Annual Meeting, Cambridge, England (2016)

“Second Amendment Historicism and Philosophy” The Second Generation of Second Amendment Scholarship” Brennan Center, NYU 2016

“The Reception of the Statute of Northampton in Early America: Regionalism and the Evolution of Common Law Constitutionalism” OIEAHC and the USC/Huntington Library Early Modern Studies Institute May 29–30, 2015

“The Right to Travel Armed in Early America: From English Restrictions to Southern Rights,” British Group in Early American History, Annual Conference Edinburgh, Scotland (2014)

“Progressives, Originalists, and Pragmatists: The New Constitutional Historicism and the Enduring Legacy of Charles Beard,” Charles Beard, Economic Interpretation and History, Rothmere Center, Oxford University (2012)

CUNY Early American Seminar, “The People’s Constitution v. the Lawyer’s Constitution,” 2011

Roundtable : “The Work of J.R. Pole,” SHEAR , Philadelphia, Pennsylvania 2011)

“The Right to Bear Arms in the Era of the Fourteenth Amendment: Gun Rights or Gun Regulation?” Bearing Arms, Policy, Policing, and Incorporation After Heller, Santa Clara Law School (2010)

“Re-envisioning Early American History,” American Historical Association Annual Meeting, San Diego (2010)

“The Ironic Second Amendment” Firearms, the Militia, and Safe Cities: Merging History, Constitutional Law and Public Policy, Albany Law School (2007)

“*District of Columbia v. Heller* and the Problem of Originalism,” University of Pennsylvania Constitutional Law Workshop, Philadelphia (2007)

- “Progressives and the Gun Control Debate,” American Constitution Society, Harvard Law School, (2006)
- “The Problem of Popular Constitutionalism in Early American Constitutional Theory,” American Association of Law Schools, Annual Conference (2006)
- “Popular Constitutionalism and the Whiskey Rebellion,” Symposium on Larry Kramer’s The People Themselves, Chicago-Kent Law School (2005)
- Roundtable Discussion on the Second Amendment and Gun Regulation, NRA/ GMU Student’s For the Second Amendment Symposium (2005)
- “The Early American Origins of the Modern Gun Control Debate: The Right to Bear Arms, Firearms Regulation, and the Lessons of History,” Gun Control: Old Problems, New Problems, Joint Conference Sponsored by the John Glenn Institute and Stanford Law School (2005)
- “Original Rules for Originalists?” University of Minnesota Law School (2005)
- “The Fourteenth Amendment and the Origins of the Modern Gun Debate,” UCLA, Legal History Workshop (2004)
- “Beyond Consensus, Beyond Embarrassment: The Use and Abuse of History in the Second Amendment Debate,” American Society of Legal History, Austin, TX (2004)
- “Armed in the Holy Cause of Liberty: Guns and the American Constitution,” NYU Legal History Colloquium (2004)
- “Digital Searches and Early American History,” SHEAR Brown University (2004)
- “Well Regulated: The Early American Origins of Gun Control,” The Second Amendment and the Future of Gun Regulation,” Joint Conference Sponsored by the John Glenn Institute and Fordham Law School, New York (2004)
- “Minuteman, Mobs, and Murder: Forgotten Contexts of the Second Amendment,” Department of History, University of California Berkeley (2003)
- “History vs. Originalism in the Second Amendment Debate,” Federalist Society/ American Constitution Society, George Washington University Law School, Washington D.C. (2003)
- “Self-defense, Public Defense, and the Politics of Honor in the Early Republic,” Lake Champlain Early American Seminar, Montreal (2003)
- “The Ironic Second Amendment” “Gun Control: Controversy, Social Values, and Policy,” University of Delaware Legal Studies Conference, Newark, Delaware (2003)
- “Individuals, Militias, and the Right to Bear Arms: The Antebellum Debate Over Guns,” Institute for Legal Studies, University of Wisconsin School of Law (2004)
- “Guns in the British Atlantic World: New Research, New Directions” Society for the Historians of the Early American Republic, Ohio State University (2003)
- “Neither Individual nor Collective: A New Paradigm for the Second Amendment,” American Bar Foundation, Chicago (2003)
- “The Changing Meaning of the Armed Citizen in American History,” “Americanism Conference,” Georgetown University (2003)

- “A New Paradigm for the Second Amendment?” Supreme Court Historical Society, Washington, D.C. (2002)
- “Constitutional History as Cultural History: The Case of the Second Amendment” European American Studies Association, Bordeaux, France (2002)
- “Don’t Know Much About History: The Current Crises in Second Amendment Scholarship,” Salmon P. Chase College of Law, Symposium, “The Second Amendment Today,” (2002)
- “History, Public Policy, and the Cyber-Age: Gun Control Policy after the Emerson Decision,” Sanford Institute of Public Policy, Duke University (2002)
- “Constitutional History After the New Cultural History: The Curious Case of the Second Amendment,” Society of the Historians of the Early American Republic, Baltimore (2001)
- Roundtable Discussion, “The State of Second Amendment Scholarship,” American Historical Association (2001)
- “Armed in the Holy Cause of Liberty: Critical Reflections on the Second Amendment Debate,” Vanderbilt University Law School (2001)
- “Neither Individual nor Collective: A New Paradigm for the Second Amendment,” Boston University Law School, (2000)
- “The Current State of Second Amendment Scholarship,” National Press Club Washington, D.C. American Bar Association, (2000)
- “Taking the Hype out of Hyper-Text, Or What Should Textbook Companies Be Doing for us on the Web,” OAH St. Louis, Missouri (1999)
- “The Ironies of Progressive Historiography: The Revival of Anti-Federalism in Contemporary Constitutional Theory,” European American Studies Association, Lisbon, Portugal (1998)
- “Deconstructing the Canon of American Constitutional History” American Society of Legal History, Seattle, Washington (1998)
- “Beyond Meta-narrative: The Promise of Hypertext,” American Studies Association, Seattle, Washington (1998)
- “Text, Context, Hypertext,” American Historical Association, Washington D.C. (1998)
- “Jefferson and Enlightenment,” International Center for Jefferson Studies, Charlottesville, VA, (1998)
- “Copley’s Watson and the Shark: Interpreting Visual Texts with Multi-media Technology,” American Studies Association, Washington, D.C. (1997)
- “Multi-Media and Post-Modernism,” H-Net Conference, Technology and the Future of History, East Lansing, Michigan (1997)
- Comment on Jack Rakove’s Original Meanings, Society of the Historians of the Early Republic, State College, PA (1997)
- “Teaching with Multi-Media Technology,” Indiana University, spring 1997 “Constitutional History from the Bottom Up: The Second Amendment as a Test Case,” McGill University, Montreal, Canada (1996)

- “Just Because You Are Paranoid, Does Not Mean the Federalists Are Not Out to Get You: Freedom of the Press in Pennsylvania,” University of Pennsylvania (1995)
- “Multi-Media and Post-Modernism: The Future of American Studies?” Lecture, Erasmus University, Rotterdam, Netherlands (1995)
- “Post-Modern American History? Ratification as a Test Case,” St. Cross College, Oxford University, Oxford, England (1994)
- “The Other Founders,” NYU Legal History Seminar,” NYU Law School (1994)
- “Reading the Rhetoric of Ratification,” paper presented at “Possible Pasts: Critical Encounters in Early America,” Philadelphia Center for Early American Studies, Philadelphia, PA (1994)
- “American Historiography and Post-Modernism,” Organization of American Historians, Atlanta, GA (1994)
- “The Anti-Federalist Origins of Jeffersonianism,” Columbia Seminar on Early American History (1994)
- “American History in a Post-Modern Age?” American Historical Association, San Francisco, CA (1994)
- “Post-Modern Constitutional History?” Indiana University School of Law, Bloomington, IN (1993)
- Participant, Institute of Early American History and Culture, planning conference, “New Approaches to Early American History,” Williamsburg, VA (1992)
- “Mere Parchment Barriers? Federalists, Anti-Federalists and the Problem of Rights Consciousness,” American Studies Association, Baltimore, MD (1991)
- “James Madison and the Bill of Rights: a comment on papers by Jack Rakove, Ralph Ketcham and Max Mintz,” Organization of American Historians and Center for the Study of the Presidency Conference, “America’s Bill of Rights at 200 Years,” Richmond, VA, (1991)
- Symposium participant, “Algernon Sidney and John Locke: Brothers in Liberty?” Liberty Fund Conference, Houston, TX (1991)
- “Mere Parchment Barriers? Antifederalists, the Bill of Rights and the Question of Rights Consciousness,” Capitol Historical Society, Washington, D.C. (1991)
- “Anti-Federalism and the American Political Tradition,” Institute of Early American History and Culture Symposium, Williamsburg, VA (1989)

Interviews, Editorials, Essays, Podcasts:

- “Clarence Thomas’ Latest Guns Decision Is Ahistorical and Anti-Originalist”
SLATE June 24, 2022

- Cherry-picked history and ideology-driven outcomes: Bruen’s originalist distortions,” SCOTUSblog (Jun. 27, 2022, 5:05 PM),
- “The Right Found a New Way to Not Talk About a School Shooting,” SLATE May 25, 2022
- “The Horror in New York Shows the Madness of the Supreme Court’s Looming Gun Decision,” *Slate* May 19, 2022
- “Guns, Guns Everywhere: Last week’s subway Shooting was Horrifying. If the Supreme Court Creates a National Right to Carry, the Future will be Worse,” *New York Daily News* Apr 17, 2022
- “The Supreme Court’s Latest Gun Case Made a Mockery of Originalism” *Slate* November 10, 2021
- “‘Originalism’ Only Gives the Conservative Justices One Option On a Key Gun Case,” *Washington Post*, November 3, 2021
- “Neither British Nor Early American History Support the Nearly Unfettered Right to Carry Arms,” *Slate* November 02, 2021
- “Will the Supreme Court Create Universal Concealed Carry Based on Fantasy Originalism?” *Slate* November 1, 2021
- “Biden was Wrong About Cannons, but Right About the Second Amendment,” *Slate* June 29, 2021
- “Barrett and Gorsuch Have to Choose Between Originalism and Expanding Gun Rights,” *Slate* April 29, 2021 *Slate*
- “What Today’s Second Amendment Gun Activists Forget: The Right Not to Bear Arms,” *Washington Post*, January 18, 2021
- “Could America’s Founders Have Imagined This?” *The New Republic*, December 20, 2019
- “Don’t Embrace Originalism to Defend Trump’s Impeachment” *The New Republic*, December 5, 2019
- “The Second-Amendment Case for Gun Control” *The New Republic*, August 4, 2019
- “The Lessons of a School Shooting—in 1853” *Politico*, March 24, 2018.
- “Originalism and the Second Amendment in *District of Columbia v. Heller*,” *University of Chicago Law Review*, Podcast, Briefly 1.9, Wed, 04/11/2018
- “Sandy Hook and the Original Meaning of the Second Amendment,” *Time* December, 2017
- “The State of the Second Amendment,” National Constitution Center, Podcast October, 2017
- “Gun Anarchy and the Unfree State: The Real History of the Second Amendment,” *The Baffler On-line* October 2017
- “Five Types of Gun Laws the Founding Fathers Loved” *Salon* October 22, 2017
- “Half Cocked,” *Book Forum* April 2016
- “Let’s Make an Honest Man of Ted Cruz. Here’s how we Resolve his “Birther” Dilemma with Integrity” *Salon* January 23, 2016
- “Guns Have Always Been Regulated,” *The Atlantic Online* December 17, 2015
- “The Slave-State Origins of Modern Gun Rights” *The Atlantic Online* 30, 2015 [with Eric Ruben]
- PBS, “Need to Know: ‘Debating the Second Amendment: Roundtable’” April 26, 2013
- “All Guns are not Created Equal” Jan 28, 2013 *Chronicle of Higher Education* [with Kevin Sweeney]

- “What the ‘Right to Bear Arms’ Really Means” *Salon* January 15, 2011 “Elena Kagan and the Case for an Elitist Supreme Court,” *Christian Science Monitor* May 20, 2010
- “Gun Points,” *Slate*, March 8, 2010 (With Justin Florence, and Matt Shors)
- “What’s Happening to Gun Control,” *To the Point*, NPR. March 11, 2010
- “Getting History Right,” *National Law Journal*, March 1, 2010
- “History and the Second Amendment,” *The Kojo Nnamdi Show*, WAMU (NPR) March 17, 2008
- “The Court and the Second Amendment,” *On Point* with Tom Ashbrook, WBUR (NPR) March 17, 2008
- “Aim for Sensible Improvements to Gun Regulations,” *Detroit Free Press*, April 29, 2007
- “A Well Regulated Militia,” *The Diane Rehm Show*, WAMU (NPR) Broadcast on Book TV (2006)
- “Taking a Bite out of the Second Amendment,” *History News Network*, January 30, 2005
- “Gun Control,” *Odyssey*, Chicago NPR September 8, 2004
- “Loaded Questions,” *Washington Post Book World* February 2, 2003
- “The Right to Bear Arms,” Interview *The Newshour*, PBS May 8, 2002
- “Real and Imagined,” *New York Times*, June 24, 1999

Other Professional Activities

- Editorial Board, Constitutional Study, University of Wisconsin Press (2014-present)
- Advisory Council, Society of Historians of the Early American Republic (SHEAR) (2007-2009)
- Program Committee, Annual Conference, Society of the Historians of the Early American Republic, Philadelphia, PA 2008
- Editorial Board, American Quarterly (2004-2007)
- Director, Second Amendment Research Center, John Glenn Institute for Public Service and Public Policy, 2002- 2007
- Fellow, Center for Law, Policy, and Social Science, Moritz College of Law, Ohio State University 2001- 2004
- Local Arrangements Committee, Annual Conference, Society of the Historians of the Early American Republic, Columbus, OH 2003
- Project Gutenberg Prize Committee, American Historical Association, 2004, 2002
- Program Committee, Annual Conference, Society of the Historians of the Early Republic, 2001
- Co-Founder Ohio Early American Studies Seminar
- NEH Fellowship Evaluator, New Media Projects, Television Projects
- Multi-media Consultant and Evaluator, National Endowment for the Humanities, Special, Projects, Division of Public Programs, Grants Review Committee (1999)

Court Citations, Amicus Briefs and Expert Witness Reports

US Supreme Court:

N.Y. State Rifle & Pistol Ass’n v. Bruen, 597 U.S. ___, 50 2022 U.S. Lexis 3055 (2022)

N.Y. State Rifle & Pistol Ass'n v. Bruen, 597 U.S. ___, 26, 28, 45, 47 2022 U.S. Lexis 3055 (2022) (Breyer, J. dissenting)

McDonald v. City of Chicago, Ill., 561 U.S. 742, 900, 901 n.44 (2010) (Stevens, J., dissenting).

McDonald v. City of Chicago, Ill., 561 U.S. 742, 914, 933 (2010) (Breyer, J., dissenting).

D.C. v. Heller, 554 U.S. 570, 666 n.32, 671, 685 (2008) (Stevens, J., dissenting).

Federal Courts:

Jones v. Bonta, United States Court of Appeals, Ninth Circuit. May 11, 2022 --- F.4th ---- 2022 WL 1485187.

Duncan v. Bonta, United States Court of Appeals, Ninth Circuit. November 30, 2021 19 F.4th 1087 2021

Young v. Hawaii, 992 F.3d 765, 785-86 (9th Cir. 2021) (en banc).

Kanter v. Barr, 919 F.3d 437, 446 n.6, 457, 462, 464 (7th Cir. 2019) (Barrett, J., dissenting).

Medina v. Whitaker, 913 F.3d 152, 159 (D.C. Cir.), cert. denied sub nom. Medina v. Barr, 140 S. Ct. 645 (2019).

Young v. Hawaii, 896 F.3d 1044, 1066 (9th Cir. 2018), reh'g en banc granted, 915 F.3d 681 (9th Cir. 2019).

Young v. Hawaii, 896 F.3d 1044, 1077 (9th Cir. 2018) (Clifton, J., dissenting), reh'g en banc granted, 915 F.3d 681 (9th Cir. 2019).

Teixeira v. Cty. of Alameda, 873 F.3d 670, 684–85 (9th Cir. 2017).

Kolbe v. Hogan, 813 F.3d 160, 175 (4th Cir. 2016), on reh'g en banc, 849 F.3d 114 (4th Cir. 2017).

Binderup v. Attorney Gen. United States of Am., 836 F.3d 336, 348 (3d Cir. 2016).

Binderup v. Attorney Gen. United States of Am., 836 F.3d 336, 370–71, 371 n.17, 372 n.19 (3d Cir. 2016) (Hardiman, J., concurring).

Binderup v. Attorney Gen. United States of Am., 836 F.3d 336, 389 n.85, 405 n.187 (3d Cir. 2016) (Fuentes, J., concurring).

Peruta v. Cty. of San Diego, 824 F.3d 919, 935 (9th Cir. 2016).

Peruta v. Cty. of San Diego, 742 F.3d 1144, 1185, 1188 (9th Cir. 2014) (Thomas, J., dissenting).

Nat'l Rifle Ass'n, Inc. v. Bureau of Alcohol, Tobacco, Firearms, & Explosives, 714 F.3d 334, 342 n.19, 343 n.23 (5th Cir. 2013) (Jones, J., dissenting).

Kachalsky v. Cty. of Westchester, 701 F.3d 81, 95 & n.21 (2d Cir. 2012).

Moore v. Madigan, 702 F.3d 933, 935 (7th Cir. 2012).

Nat'l Rifle Ass'n of Am., Inc. v. Bureau of Alcohol, Tobacco, Firearms, & Explosives, 700 F.3d 185, 200, 202–03 (5th Cir. 2012).

United States v. Carpio-Leon, 701 F.3d 974, 980 (4th Cir. 2012).

United States v. Greeno, 679 F.3d 510, 519 (6th Cir. 2012).

United States v. Yancey, 621 F.3d 681, 684 (7th Cir. 2010).

United States v. Rene E., 583 F.3d 8, 12, 15–16 (1st Cir. 2009).

Miller v. Sessions, 356 F. Supp. 3d 472, 481 (E.D. Pa. 2019).

Grace v. D.C., 187 F. Supp. 3d 124, 138 n.11 (D.D.C. 2016).

Powell v. Tompkins, 926 F. Supp. 2d 367, 386 (D. Mass. 2013), aff'd, 783 F.3d 332 (1st Cir. 2015).

United States v. Tooley, 717 F. Supp. 2d 580, 589–591 (S.D.W. Va. 2010), aff'd, 468 F. App'x 357 (4th Cir. 2012).

United States v. Boffil-Rivera, No. 08-20437-CR, 2008 WL 8853354, 6 (S.D. Fla. Aug. 12, 2008), report and recommendation adopted sub nom.

United States v. Gonzales-Rodriguez, No. 08-20437-CR, 2008 WL 11409410 (S.D. Fla. Sept. 22, 2008), aff'd sub nom.

United States v. Boffil-Rivera, 607 F.3d 736 (11th Cir. 2010).

State Courts:

Norman v. State, 215 So. 3d 18, 30 & nn.11–12 (Fla. 2017).

Posey v. Com., 185 S.W.3d 170, 179–180 (Ky. 2006).

Posey v. Com., 185 S.W.3d 170, 185 n.3 (Ky. 2006) (Scott, J., concurring).

State v. Craig, 826 N.W.2d 789, 796 (Minn. 2013).

People v. Handsome, 846 N.Y.S.2d 852, 858 (N.Y. Crim. Ct. 2007).

Zaatari v. City of Austin, No. 03-17-00812-CV, 2019 WL 6336186, 22 (Tex. App. Nov. 27, 2019) (Kelly, J., dissenting).

State v. Roundtree, 2021 WI 1, 395 Wis. 2d 94, 952 N.W.2d 765

State v. Christen, 2021 WI 39, 958 N.W.2d 746

Amicus Briefs:

Amicus Brief, *Harper v. Moore*, No. 21-1271 (U.S. Supreme Court, 2022) [ISLT and Gerrymandering]

Amicus Brief *KOX V. STATE OF GEORGIA, SUPREME COURT STATE OF GEORGIA* Case No. S23A0167 [Second Amendment and Campus Carry]

Amicus Brief, *NYSRPA v. Bruen*, No. 20-843 (U.S. Supreme Court, 2021) [2nd Amendment]

Amicus Brief, *Young v. State of Hawaii* N O . 12-17808 (9th Cir. 2020) [2nd Amendment]

Amicus Brief, *Gould v. Morgan*, No. 17-2202 (1st Cir. 2018) [2nd Amendment]

Amicus Brief, *Flanagan vs. Becerra*, Central District of California Case (2018) [2nd Amendment]

Amicus Brief, *Gill v. Whitford* (US Supreme Court, 2017) [Partisan Gerrymandering]

Amicus Brief, *Woollard v Gallagher*, (4th Cir. 2013) [Second Amendment]

Amicus Brief *Heller v. District of Columbia* [Heller II] (US Court of Appeals for D.C.) (2010) [2nd Amendment]
Amicus Brief, *McDonald v. City of Chicago* (US Supreme Court,2010) [14th Amendment]
Amicus Brief, *District of Columbia v. Heller* (US Supreme Court 2008) [2nd Amendment]
Amicus Brief, *Silvera v. Lockyer*, case on appeal(9th Circuit 2003) [2nd Amendment]
Amicus Brief, *Emerson v. U.S.* case on appeal (5th Circuit 1999) [2nd Amendment]
Pro-bono Historical Consultant State of Ohio, *McIntyre v. Ohio*, (U.S. Supreme Court, 1995) [1st Amendment]

Expert Witness Reports

Rocky Mountain Gun Owners, Nonprofit Corp. v. Hickenlooper, 14-cv-02850 (D. Colo.).
Chambers, et al., v. City of Boulder, 2018 CV 30581 (Colo. D. Ct. City of Boulder, filed June 14, 2018).
Zeleny v. Newsom, 14-cv-02850 (N.D. Cal.).
Miller, et al v. Smith, et al., 2018 cv 3085 (C.D. Ill.).
Jones v. Bonta United States Court of Appeals, --- F.4th ---- , 2022 WL 1485187 (9th Cir., May 11, 2022).
Baird v. Bonta, No. 2:19-cv-00617 (E.D. Cal.).
Worth v. Harrington, 21-cv-1348 (D. Minn.).

Law Review Symposia Organized

Second Amendment:

“The Second Amendment and the Future of Gun Regulation: Historical, Legal, Policy, and Cultural Perspectives,” 73 *Fordham L. Rev.* 487 (2004).
“Gun Control: Old Problems, New Paradigms” 17 *Stan. L. & Pol’y Rev.* 671 (2006).
“A Symposium on Firearms, the Militia and Safe Cities: Merging History, Constitutional Law and Public Policy,” 1 *Alb. Gov’t L. Rev.* 292 (2008).
”The 2nd Amendment at the Supreme Court: “700 Years of History” and the Modern Effects of Guns in Public,” 55 *U.C. Davis L. Rev.* 2545 (2022).

New Originalism:

“The New Originalism” 82 *Fordham L. Rev.* 721 (2013).
“Historians and the New Originalism: Contextualism, Historicism, and Constitutional Meaning”84 *Fordham L. Rev.* 915 (2015).

Exhibit 2

DICTIONARIUM BRITANNICUM:
154 Or a more COMPLEAT *Pott*
 UNIVERSAL ETYMOLOGICAL
 ENGLISH DICTIONARY

Than any EXTANT.

CONTAINING

Not only the Words, and their Explication; but their Etymologies from the *Antient British, Teutonick, Low and High Dutch, Saxon, Danish, Norman and Modern French, Italian, Spanish, Latin, Greek, Hebrew, Chaldee, &c.* each in its proper Character.

A L S O

Explaining hard and technical Words, or Terms of Art, in all the *ARTS, SCIENCES,* and *MYSTERIES* following. Together with *ACCENTS* directing to their proper Pronunciation, shewing both the *Orthograpy* and *Orthoepia* of the *English Tongue,*

V I Z. I N

AGRICULTURE, ALGEBRA, ANATOMY, ARCHITECTURE, ARITHMETICK, ASTROLOGY, ASTRONOMY, BOTANICKS, CATOPTRICKS, CHYMISTRY, CHYROMANCY, CHIRURGERY, CONFECTIONARY, COOKERY, COSMOGRAPHY, DIALLING, DIOPTRICKS, ETHICKS, FISHING, FORTIFICATION, GARDENING, GAUGING, GEOGRAPHY, GEOMETRY, GRAMMAR, GUNNERY, HANDICRAFTS, HAWKING, HERALDRY, HORSEMANSHIP, HUSBANDRY, HY-	DRAULICKS, HYDROGRAPHY, HYDROSTATICKS, LAW, LOGICK, MARITIME and MILITARY AFFAIRS, MATHEMATICKS, MECHANICKS, MERCHANDIZE, METAPHYSICKS, METEOROLOGY, NAVIGATION, OPTICKS, OTACOUSTICKS, PAINTING, PERSPECTIVE, PHARMACY, PHILOSOPHY, PHYSICK, PHYSIOGNOMY, PYROTECHNY, RHETORICK, SCULPTURE, STATICKS, STATUARY, SURVEYING, THEOLOGY, and TRIGONOMETRY.
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Illustrated with near Five Hundred CUTS, for Giving a clearer Idea of those Figures, not so well apprehended by verbal Description.

L I K E W I S E

A Collection and Explanation of WORDS and PHRASES us'd in our ancient Characters, Statutes, Writs, Old Records and Processés at Law.

A L S O

The Theogony, Theology, and Mythology of the *Egyptians, Greeks, Romans, &c.* being an Account of their Deities, Solemnities, either Religious or Civil, their Divinations, Auguries, Oracles, Hieroglyphicks, and many other curious Matters, necessary to be understood, especially by the Readers of *English POETRY.*

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L O N D O N:

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A B

ABOMASUM [with Anatomists] One of the four Stomachs of ruminant Animals, i.e. such as chew the Cud; the other three are called Penter, Reticulum, and Omasum.

ABOMINABLE [abominari, according to the native Sense of the Word, from ab and omen, L. signifies to account a Thing for an ill Omen, or an unlucky Sign, and therefore to pray against it by certain Forms of Speech] to be abhorred, loathed or hated.

ABOMINATE [abominari, of ab and omen] properly signifies to take a thing for an ill Sign or unlucky Omen; to pray against it, or with the contrary, by certain Forms and Speeches, we use it for to abhor, hate or loath.

ABOMINATION, a thing to be abhor'd or loathed, a detestable thing. L.

ABOMINOSE [abominosus, L.] full of Abomination. ABORIGINES [of ab and origo] the People of Italy by Saturn, or such Nations as the Italians, who pretend to have been anciently without Original or Derivation from any other Nation or People.

ABORT [with the ancient Britains] signified a River, AVON § and was a general Name for all Rivers. To ABORT [abortivus, F. of ab and oritur, L.] to miscarry, or bring forth the Fœtus, before it is arrived at its Maturity for Birth.

ABORTION [of abortivus, L. to rise or spring up untimely] the untimely Exclusion of the Fœtus, commonly called a Miscarriage in Women.

ABORTION [with Gardeners] a Term used of Fruits that are produced too early before their Time, as when Trees happening to be blasted by noxious Winds, are subject to this Malady, never bringing their Fruit to Maturity.

ABORTION [of abortivus, F.] Miscarriage in Women, or the bringing forth a Child before its Time, that is not in a Capacity to live.

ABORTIVE [abortivus, L.] pertaining to such a Birth, still-born, untimely, also that comes to nothing, as an abortive Design.

AN ABORTIVE, a sort of fine Vellum made of the Skin of a Calf-calf or Lamb.

ABORTIVENESS, Miscarriage; also Unsuccessfulness. ABOVE [of abo'tan, Sax.] aloft, higher; also more than, as over and above.

ABOUT [of abotan, Sax.] round about, also near in Time and Place; also ready, as about to go.

ABOUTED [with Gardeners] a Term used to denote that Trees are budded. It properly signifies a Swelling formed in the human Body, which has come to a Head or Abscess, and is applied to Trees, in that the Buds of them do in like manner arise like small Heads.

ABRACADABRA, this Word is a Spell or Charm, which is still in Use and Esteem with some Superstitious Persons, who pretend to do Wonders by it in the Cure of Agues and Fevers, which is to be written in the Form of a Triangle, decreasing one Letter every Line till it comes to a Point; and the Illiterate write the Letters in English Characters in the same Form.



ABRACAR, a Name which Basilides, an Heretick of the second Century, gave to God, who he said was the Author of 365, i.e. the 365 Days in the Year, to which the Letters א ב ג ד ה ו ז ח ט י כ ל מ נ ס ע פ צ ק ר ש ת אבגדהו זחט יכ למנסעפצקרשת אבגדהו זחט יכ למנסעפצקרשת אבגדהו זחט יכ למנסעפצקרשת

ABRAHAM'S BALM [in Botany] the Hemp-tree. To ABRADE [abradere, L.] to shave off. APPRA'SION, a shaving off; also a razing or blotting out.

A B

ABRA'SION [with Surgeons] a superficial raising of the Skin.

ABRASION [in a Medicinal Sense] the wearing away the natural Mucus, which covers the Membranes, particularly those of the Stomach and Guts, by corrosive or Sharp Humours.

ABRASSION [with Physicians] that Matter which is worn off by Attrition of Bodies one against another. ABRENUCIATION, a renouncing or forsaking any thing entirely.

ABRIDGE [with Chymists] Sulphur. To ABRIDGE [abridge, F.] to make shorter in Words, to contract, still retaining the Sense and Substance.

To ABRIDGE [in Law] to make a Declaration, or count short, by leaving out Part of the Plein or Demand, and praying that the Defendant may answer to the other.

ABRIDGMENT [abridgment, F.] an abridging, &c. wherein the less material Things are omitted or but briefly, and so the whole brought into a lesser Compass; an Epitome or short Account of a Matter; a Summary or short Account of the Matter of a Book.

ABRIDGMENT [of account, &c. in Law] is the making it shorter by abstracting some of its Circumstances. ABROCAMENTUM See Abbrachment.

To ABRUGATE [abrugatum, Sup. of abrogare, L.] to disannul or abolish, especially to repeal or make a Law void, which was before in Force.

ABROGATION, a disannulling, &c. L. ABROOD [of abrood, Sax.] as to sit brood as an Hen on Eggs, to cherish.

ABROTANITES [Αβροτανίτις, Gr.] Wine made of Southernwood. ABROTANUM [Αβροτανος, Gr.] the Herb Southernwood. ABROTONITES [Αβροτονίτις, Gr.] Wormwood Wine.

ABRUPT [abruptus, L.] Breaking off suddenly; unseasonable; also rough, hasty.

The ABRUPT [abruptum, L.] the uneven, rough, broken, or craggy, Part of the Abyss. Milton. ABRUPTNESS, the breaking or being broken off on a sudden; also Cragginess of a Rock, Mountain, &c.

ABSCISS [abscissus, L. of abs and cido, L. to retire; because the Parts are disunited by the Matter] a gross Tumor, Ulcer, or Swelling in any Part of the Body, which may either be dissolved, or be brought to run with Matter.

To ABSICIND [abscindere, L.] to cut off. ABSICISSÆ [in Conick Sections, or other Curvilinear Figures] are the Parts of the Axis cut off by the Ordinates, and accounted downwards from the Vertex of the Section, thus V b or V B are the Abscissæ in this Figure. Some Writers call these the Intercepted Axes or intercepted Diameters.

ABSCISSION [of abs and scindo, to cut] a cutting off. L. ABSCISSION [with Astrologers] a Term used, when three Planets being within the Bounds of their Orbs, and in different Degrees of the Sign; the third comes to a Conjunction with the middle Planet, and cuts off the Light of the first.

To ABSCOND [abscondere, L.] to hide one's self. ABSENT [absens, L.] that is out of the Way, missing or wanting.

To ABSENT one's self, to be voluntarily absent, not to appear, to keep out of the Way. ABSENTA'NEOUS [absentaneus, L.] pertaining to Absence, done in Absence.

ABSENTEE'S, a Parliament held in Dublin the 28th of Henry VIII. ABSINTHIATED [absinthiatum, L.] mingled with Wormwood.

ABSINTHIOMENON [Αψινθίουμνον, Gr.] Southernwood, or Wormwood gentle. ABSINTHITES [Αβσινθίτις, Gr.] Wine made of Wormwood.

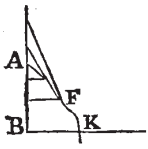
ABSINTHIUM [Αψινθιον, Gr.] Wormwood. A'PSIS [Ψ, Gr.] the bowed or arched Roof of a Room, House, Oven, &c. also the Ring or Compass of a Wheel.

AP'SIS [in Astronomy] is when the Planets moving to AP'SIS § their highest or lowest Places are at a Stay; the high Ap'sis being called the Apogæum, and the low Ap'sis the Perigæum.

To ABSIST [absistere, L.] to cease or leave off. ABSOLUTE [absolutus, L.] out of Use, neglected. ABSOLVATORY [of absolvitorius, L.] pertaining to a Discharge or Acquittal.

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I N

INFORM, [*Infirmus*, L.] weak, feeble, crazy, sickly.
INFIRMARY [*Infirmarium*, L. *Infirmaris*, F.] an Apartment, or Lodgings, for sick People.
INFIRMNESS } [*Infirmitas*, L.] Weakness, feebleness of
INFIRMITY } Body, Sickness.
INFISTULATED [*in fistulatus*, L.] turned to or become fistulous; also full of fistulas.
TO INFIX, [*infixum*, sup. of *infigere*, L.] to fix or fasten into.
TO INFLAME, [*Inflammaré*, L.] to set ones Heart on fire, to heat, to inrage or incense; also to provoke, to put into a Passion.
INFLAMMABLENESS [of *inflammable*, F; *inflammare*, L.] capableness of being inflamed or set on fire.
INFLAMMATION [*in Medicine*] a blistering heat, a Tumor occasioned by an obstruction, by means whereof the Blood in the Flesh and Muscles, flowing into some part faster than it can run off again, swells up and causes a Tension with an unusual soreness, redness and heat.
INFLAMMATIVE, of an inflaming Nature or Quality.
INFLATE *Expression*, an Expression swelling with big Words; but to no great purpose.
TO INFLATE [*inflatus*, L.] to blow, swell, or puff up with Wind.
INFLATION [*in Medicine*] a puffing up, a windy Swelling, the extension of a part occasioned by windy Humours.
TO INFLECT [*inflecteres*, L.] to bend or bow.
INFLECTION } a bending or bowing.
INFLEXION }
INFLECTION [with *Grammar*] is the variation of Nouns and Verbs in their several Cases, Tenses and Declensions.
INFLECTION [*in Opticks*] a multiplex Refraction of the Rays of Light, caused by the unequal thickness of any Medium; so that the Motion or Progress of the Ray is hindered from going on in a right Line, and is *inflected* or bent back on the inside by a Curve.

INFLECTION Point of any Curve [*Geometry*] is that Point or Place, where the Curve begins to bend back again a contrary way. As for instance, when a Curve Line as A, F, K, is partly concave and partly convex towards any right Line, as A, B, or towards a fixt point, as then the Point F, which divides the concave from the convex part, and consequently is at the beginning of the one, and the end of the other, is called the Point of Inflection, as long as the Curve being continued in towards F, keeps its course the same; but the Point K is called the Point of Retrogression, where it begins to reflect back again towards that part or side where it took its original.
INFLEXIBILITY } [*inflexibilitas*, L. *inflexibilités*, F.] that which cannot be bowed or bend-
INFLEXIBLE } ed; also an inflexible Temper, obstinateness, stiffness.
TO INFLICT [*influxum*, sup.] to lay a Punishment upon.
INFLICTION, a limiting, a laying a Punishment upon. L.
INFLUENCE [*influentia*, L.] an Emission of a Power or Virtue; also the working or prevailing upon; power over, &c.
INFLUENCE [*in Astrology*] a quality supposed to flow from the Bodies of the Stars, or the Effect of their Heat and Light, to which, the pretenders to that Art, attribute all the Events that happen on the Earth.
INFLUENCED [of *influentia*, L.] swayed, biased, inclined towards, wrought upon.
TO INFLUENCE [of *influentia*, of *influere*, L.] to flow into, to have an influence upon, to produce or cause; to sway or have power over.
INFLUENT [*influens*, L.] flowing into.
INFLUENT Juices [*in Medicine*] such juices of a human Body, that by the contrivance of Nature and laws of Circulation, fall into another Current or Receptacle; as the *Bile* into the Gall-Bladder, &c.
INFLUENTIAL, influencing or bearing sway.
INFLUX [*influens*, L.] a flowing or running into, especially of one River into another.
TO INFOLD [of *in* and *foldan*, Sax.] to fold or wrap up.
TO INFORCE [*inforcir*, F.] to prevail upon by force of Argument, to constrain or oblige.
INFORCEMENT, such a compulsion or restraint.
TO INFORM [*informare*, L.] to give notice, to tell, to instruct, to teach, to make acquainted with.
INFORM [*informis*, L.] unshapen, without form; also ugly.
IN FORMA Pauperis [*i. e.* under the form of a poor Person] is when a Person having made Oath before a Judge, that he is not worth 5 Pound, his Debts paid, is admitted to sue, ha-

I N

ving Council or an Attorney assigned to manage his Buiness without any Fees. L.
INFORMATION, an informing relation, advice; also instruction, a making known; also an accusation brought against one before a Magistrate. F. of L.
INFORMATUS *nom sum* [*i. e.* I am not informed] a formal answer made in Court, by an Attorney who has no more to say in the defence of his Client.
INFORMED Stars [with *Astrologeri*] are such fixed Stars as are not ranged under any form or particular constellation.
INFORMER, one who in any Court of Judicature informs against, or prosecutes any Persons who transgress any Law or penal Statute.
INFORMOUS [*informis*, L.] that is without form, fashion or shape.
INFORTUNATE [*infortunatus*, L.] unfortunate, unlucky, unhappy.
INFORTUNATENESS, unhappiness, unluckiness.
INFORTUNES [with *Astrologeri*] the Planets *Saturn* and *Mars*, so called by reason of their ill-disposed Natures and unfortunate Influences.
INFRA Scapularis Musculus [with *Anatomistis*] a broad or fleshy Muscle of the Arm, arising from the lower side of the *Scapula*, and ending in the third Ligament of the Shoulder. L.
INFRA Spinatus Musculus [with *Anat.*] a Muscle of the Arm, so termed from the being placed below the Spine, under which it arises from the *Scapula*, and is inserted to the Shoulder Bone. This Muscle moves the Arm directly backwards.
INFRACTION, a breaking in, a rupture or violation of a Treaty, a Law, Ordinance, &c.
TO INFRANCHISE [of *affranchir*, F.] to set free, to give one his Liberty; to make a Freeman or Denizen; to incorporate into a Society or Body politick.
INFRANCHISEMENT [*affranchisement*, F.] a making free, &c. also delivery, discharge, release.
INFRA LAPSIANS, a Sect who hold that God has created a certain number of Men, before the fall of *Adam*, only to be damned, without allowing them the means necessary for their Salvation, if they would labour never so much after it.
INFRANGIBLE [of *infrangibilis*, L.] not to be broken; durable, strong.
INFRANGIBLENESS, uncapableness of being broken.
INFREQUENCY [of *infrequentia*, L.] feldomness.
INFREQUENT [of *infrequens*, L.] feldom happening, rare, uncommon.
INFRICTION } a rubbing or chafing. L.
INFRICTION }
TO INFRIENGE [*infringere*, L.] to break a Law, Custom or Privilege.
INFRIEMENT, such violation or breach.
INFUNCTUOUS [*infructuosus*, L.] unfruitful.
INFUNCTIFEROUS [*infructiferus*, L.] bearing no Fruit.
INFUCATED [*infucatus*, L.] painted over.
INFUCATION, a painting of the Face, a colouring or disguising. L.
INFULA, a Name antiently given to some of the pontifical Ornaments, which are said to be Filaments or Fringes of Wool, with which Priests, Victims and even Temples were adorned.
TO INFUMATE [*infumare*, L.] to Smoke or dry in the Smoke.
INFUMATION, a drying in the Smoke. L.
INFUNDIBULIFORMES [with *Botanistis*] a term applied to such Flowers, as are shaped like a Funnel.
INFUNDIBULUM, a Tunnel or Funnel for the pouring of Liquors into a Vessel. L.
INFUNDIBULUM Cerebri [*Anatomy*] the Brain Tunnel, a hollow place in the Root of the Brain, through which serous Humours are discharged. L.
INFUNDIBULUM Renum [*Anatomy*] the *Pelvis* or Basin of the Reins, thro' which the Urine passes to the Ureters and Bladder. L.
INFURATE [of *in* and *furatus*, L.] stark Mad; also recovered from Madness.
INFUSATION, a making dark or dusky. L.
TO INFUSE [*infusum*, sup. of *infundere*, L.] to pour in, or into; to steep or soak; also to inspire or endue with.
INFUSION, a pouring in, &c. L.
INFUSION [*in Pharmacy*] is a steeping of any kinds of Drugs, Roots, Leaves, &c. in some Liquor proper to draw out their Virtues.
TO INGAUGE. See *To Engage*.
TO INCEMINATE [*ingeminare*, L.] to double or repeat often.
INCEMINATED Flowers [with *Botanistis*] are such when one Flower stands on, or grows out, of another.

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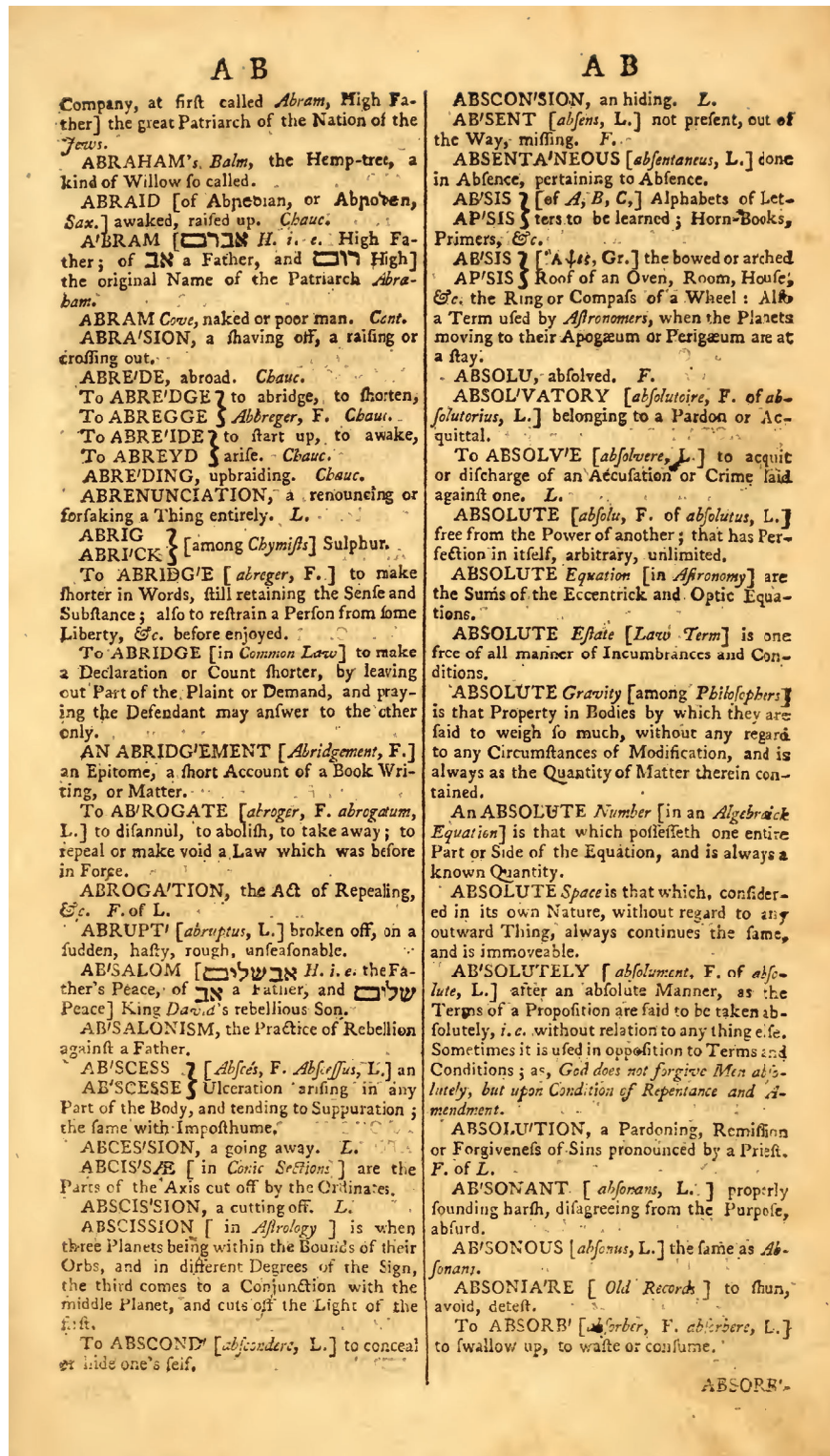
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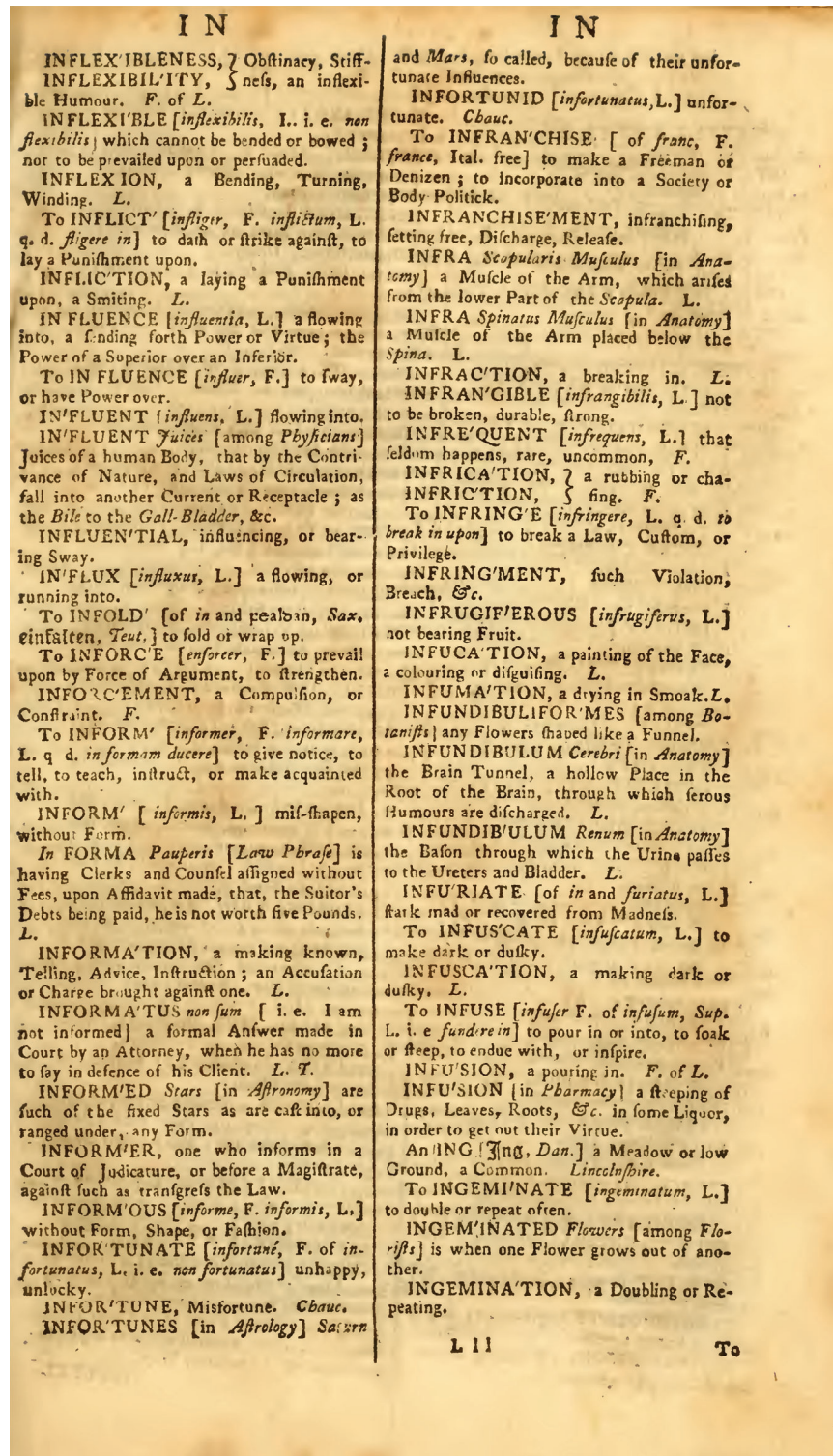
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Cum tabulis animi censoris fumet honesti:
Audebit quæcunque parum splendoris habebunt,
Et sine pondere erunt, et honore indigna ferentur.
Verba movere loco; quamvis invita recedant,
Et versentur adhuc intra penetralia Vestæ:
Obscurata diu populo bonus eruet, atque
Proferet in lucem speciosa vocabula rerum,
Quæ præcis memorata Catonibus atque Cethegis,
Nunc situs informis premit et deserta vetustas. HOR.

LONDON,

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MDCCLV.

A B R

6. Relating to the person, as a servant.
Liking very well the young gentleman, such I took him to be, admitted this Deiphantes *about* me, who well shewed there is no service like his that serves because he loves. *Sidney, b. ii.*
Good matter, corporal, captain, for my old dame's sake, stand my friend: she hath no body to do any thing *about* her when I am gone, and she is old and cannot help herself. *Shakespeare's Henry IV. p. ii.*

ABO'UT. *adv.*

1. Circularly.
The wayward sisters, hand in hand,
Posters of the sea and land,
Thus do go *about, about,*
Thrice to thine, and thrice to mine,
And thrice again to make up mine. *Shakespeare, Macbeth.*

2. In circuit.
My honest lads, I'll tell you what I am *about*.—Two yards and more.—No quips now Pistol: indeed I am in the waste two yards *about*; but I am about no waste, I am about thrift. *Shakespeare's Merry Wives of Windsor.*
A tun *about* was ev'ry pillar there,
A polish'd mirror thence not half so clear. *Dryd. Fables.*

3. Nearly.
When the boats were come within *about* sixty yards of the pillar, they found themselves all bound, and could go no farther; yet so as they might move to go *about*, but might not approach nearer. *Bacon's New Atlantis.*

4. Here and there; every way.
Up rose the gentle virgin from her place,
And looked all *about*, if she might spy
Her lovely knight to move his manly pace. *Fairy Queen, b. i. cant. 2. stanza. 33.*
A wolf that was past labour, had the wit in his old age, yet to make the best of a bad game; he borrows a habit, and so *about* he goes, begging charity, from door to door, under the disguise of a pilgrim. *L'Estrange.*

5. With to before a verb; as, *about to fly*; upon the point, within a small distance of.
These dying lovers, and their floating fons,
Suspend the fight, and silence all our guns:
Beauty and youth, *about* to perish, finds
Such noble pity in brave English minds. *Waller.*

6. The longest way, in opposition to the short straight way.
Gold hath these natures; greatness of weight; closeness of parts; fixation; pliancy, or softness; immunity from rust; colour, or tincture of yellow: Therefore the sure way (though most *about*) to make gold, is to know the causes of the several natures before rehear'd. *Bacon's Natural Hist. N^o 328.*
Spies of the Volcians
Held me in chafe, that I was forc'd to wheel
Three or four miles *about*; else had I, Sir,
Half an hour since brought my report. *Shakespeare, Coriolanus.*

7. To bring about; to bring to the point or state desired; as, *he has brought about his purposes.*
Whether this will be brought *about*, by breaking his head,
I very much question. *Spectator.*

8. To come about; to come to some certain state or point.
Wherefore it came to pass, when the time was come *about*,
after Hannah had conceived, that the bare son. *1 Sam. i. 20.*
One evening it befel, that looking out,
The wind they long had wish'd was come *about*;
Well pleas'd they went to rest; and if the gale
'Till morn continu'd, both resolv'd to fail. *Dryd. Fables.*

9. To go about a thing; to prepare to do it.
Did not Moses give you the law, and yet none of you
keepeth the law? Why go ye *about* to kill me? *John vii. 19.*
In common language, they say, to come *about* a man, to circumvent him.

- Some of these phrases seem to derive their original from the French *à bout*; *venir à bout d'une chose*; *venir bout de quelque un.*

- A. Bp. for Archbishop; which see.
ABRACADABRA. A superstitious charm against agues.
To ABRA'DE. *v. a.* [*abrado*, Lat.] To rub off; to wear away from the other parts; to waste by degrees.
By this means there may be a continued supply of what is successively *abraded* from them by decurtion of waters. *Hale's Origin of Mankind.*

ABRAHAM'S BALM. The name of an herb.

- ABRASION. [See ABRAD.]
1. The act of abrading; a rubbing off.
2. [In medicine.] The wearing away of the natural mucus, which covers the membranes, particularly those of the stomach and guts, by corrosive or sharp medicines, or humours. *Quincy.*
3. The matter worn off by the attrition of bodies.

ABRAST. *adv.* [See BREAST.] Side by side; in such a position that the breasts may bear against the same line.

- My cousin Suffolk,
My soul shall thine keep company to heaven:
Tarry, sweet soul, for mine, then fly *abroad*. *Shak. Henry V.*
For honour travels in a freight so narrow,
Where one but goes *abroad*. *Shakespeare, Troilus and Cressida.*

A B R

The riders rode *abroad*, and one his shield,
His lance of cornel-wood another held;
The third his bow, and glorious to behold!
The costly quiver, all of burnish'd gold. *Dryden's Fables.*

ABRICOT. See APRICOT.

To ABRIDGE. *v. a.* [*abreger*, Fr. *abbreviare*, Lat.]

1. To make shorter in words, keeping still the same substance.
All these sayings, being declared by Jason of Cyrene in five books, we will *abridge* in one volume. *2 Macc. ii. 23.*

2. To contract, to diminish, to cut short.
The determination of the will, upon enquiry, is following the direction of that guide; and he, that has a power to act or not to act, according as such determination directs, is free. Such determination *abridges* not that power wherein liberty consists. *Locke.*

3. To deprive of; in which sense it is followed by the particle *from* or *of*, preceding the thing taken away.
I have disabled mine estate,
By shewing something a more swelling port,
Than my faint means would grant continuance;
Nor do I now make moan to be *abridg'd*
From such a noble rate. *Shakespeare's Merchant of Venice.*

They were formerly, by the common law, discharged from pontage and murage; but this privilege has been *abridged* them since by several statutes. *Ayliffe's Parergon Juris Canonici.*

ABRIDGED OF. *part.* Deprived of, debarred from, cut short.

An ABRIDGER.

1. He that abridges; a shortener.

2. A writer of compendiums or abridgments.

ABRIDGMENT. *n. f.* [*abregement*, Fr.]

1. The contraction of a larger work into a small compass.
Surely this commandment containeth the law and the prophets; and, in this one word, is the *abridgment* of all volumes of scripture. *Hooker, b. ii. § 5.*

Myself have play'd
The int'rim, by remembering you 'tis past;
Then brook *abridgment*, and your eyes advance
After your thought, straight back again to France?

Shakespeare's Henry V.
Idolatry is certainly the first-born of folly, the great and leading paradox; nay, the very *abridgment* and sum total of all absurdities. *South's Sermons.*

2. A diminution in general.

All trying, by a love of littleness,
To make *abridgments*, and to draw to lefs,
Even that nothing which at first we were. *Donne.*

3. Restraint, or abridgment of liberty.
The constant desire of happiness, and the constraint it puts upon us, no body, I think, accounts an *abridgment* of liberty, or at least an *abridgment* of liberty, to be complained of. *Locke.*

ABROACH. *adv.* [See To BROACH.]

1. In a posture to run out; to yield the liquor contained; properly spoken of vessels.
The Templer spruce, while ev'ry spout's *abroach*,
Stays 'till 'tis fair, yet seems to call a coach. *Swift's Misc.*

The jars of gen'rous wine (Acestes' gift,
When his Trinacrian shores the navy left)
He set *abroach*, and for the feast prepar'd,
In equal portions with the ven'fon shar'd.
Dryden's Virgil's Æneid, vol. ii.

2. In a figurative sense: in a state to be diffused or advanced; in a state of such beginning as promises a progress.
That man, that fits within a monarch's heart,
And ripens in the sunshine of his favour,
Would he abuse the countenance of the king,
Alack! what mischief might be set *abroach*,
In shadow of such greatness? *Shakespeare's Henry IV. p. ii.*

ABROAD. *adv.* [compounded of *a* and *broad*. See BROAD.]

1. Without confinement; widely; at large.
Intermit no watch
Against a wakeful foe, while I *abroad*,
Thro' all the coasts of dark destruction, seek
Deliverance. *Milton's Paradise Lost, b. ii. l. 463.*

Again, the lonely fox roams far *abroad*,
On secret rapine bent, and midnight fraud;
Now haunts the cliff, now traverses the lawn,
And flies the hated neighbourhood of man. *Prior.*

2. Out of the house.
Welcome, sir,
This cell's my court; here have I few attendants,
And subjects none *abroad*. *Shakespeare's Tempest.*
Lady—walked a whole hour *abroad*, without dying after it; at least in the time I staid; though she seem'd to be fainting, and had convulsive motions several times in her head. *Pope's Letters.*

3. In another country.
They thought it better to be somewhat hardly yoked at home, than for ever *abroad*, and discredited. *Hooker's Pref.*

Whoever offers at verbal translation, shall have the misfortune of that young traveller, who lost his own language *abroad*, and brought home no other instead of it. *Sir J. Denham.*

What

What

What

I N F

He should regard the propriety of his words, and get some information in the subject he intends to handle. *Swift.*

These men have had longer opportunities of information, and are equally concerned with ourselves. *Rogers.*

2. Charge or accusation exhibited.
3. The act of informing or acquainting.

INFORMER. *n. f.* [from *inform.*]

1. One who gives intelligence.

This writer is either byassed by an inclination to believe the worst, or a want of judgment to chuse his informers. *Swift.*

2. One who discovers offenders to the magistrate.

There were spies and informers set at work to watch the company. *L'Esrange.*

Let no court sycophant pervert my sense,
Nor fly informer watch these words to draw
Within the reach of treason. *Pope.*

Informers are a detestable race of people, although sometimes necessary. *Swift.*

INFORMIDABLE. *adj.* [in and *formidabilis*, Latin.] Not to be feared; not to be dreaded

Of strength, of courage haughty, and of limb
Heroick built, though of terrestrial mold;
Foe not *informidable*, exempt from wound. *Milton.*

INFORMITY. *n. f.* [from *informis*, Latin.] Shapelessness.

From this narrow time of gestation may ensue a smallness in the exclusion; but this inferreth no *informity*. *Brown.*

INFORMOUS. *adj.* [*informe*, French; *informis*, Latin.] Shapeless; of no regular figure.

That a bear brings forth her young *info motis* and unshapen, which the fashioneth after by licking them over, is an opinion not only common with us at present, but hath been delivered by ancient writers. *Brown's Vulgar Errors.*

INFORTUNATE. *adj.* [*infortunus*, Fr. *infertunatus*, Latin.] Unhappy. See UNFORTUNATE, which is commonly used.

Perkin, seeing himself prisoner, and desitute of all hopes, having found all either false, faint, or *infortunate*, did gladly accept of the condition. *Bacon's Henry VII.*

To INFRACT. *v. a.* [*infractus*, Latin.] To break.

Falling fast, from gradual slope to slope,
With wild *infracted* course and less'n'd roar,
It gains a safer bed. *Thomson's Summer.*

INFRACTION. *n. f.* [*infractio*, French; *infractio*, Latin.] The act of breaking; breach; violation.

By the same gods, the justice of whose wrath
Punish'd the *infractio* of my former faith. *Waller.*
The wolves, pretending an *infractio* in the abuse of their hostages, fell upon the sheep immediately without their dogs. *L'Esrange's Fables.*

INFRAINGIBLE. *adj.* [in and *frangibile*.] Not to be broken.

These atoms are supposed *infrangible*, extremely compacted and hard, which compactness and hardness is a demonstration that nothing could be produced by them, since they could never cohere. *Chayne's Phil. Princ.*

INFREQUENCY. *n. f.* [*infrequentia*, Latin.] Uncommonness; rarity.

The absence of the gods, and the infrequency of objects, made her yield. *Brown's Notes on Pope's Odyssey.*

INFREQUENT. *adj.* [*infrequens*, Latin.] Rare; uncommon.

To INFRIGIDATE. *v. a.* [in and *frigidus*, Latin.] To chill; to make cold.

The drops reached little further than the surface of the liquor, whose coldness did not *infrigidate* those upper parts of the glass. *Boyle.*

To INFRINGE. *v. a.* [*infringere*, Latin]

1. To violate; to break laws or contracts.

Those many had not dar'd to do that evil,
If the first man that did the *infringe*,
Had answer'd for his deed. *Shakespeare.*
Having *infring'd* the law, I wove my right
As king, and thus submit myself to fight. *Waller.*

2. To destroy; to hinder.

Homilies, being plain and popular instructions, do not *infringe* the efficacy, although but read. *Hosker.*
Bright as the deathless gods and happy, she
From all that may *infringe* delight is free. *Waller.*

INFRINGEMENT. *n. f.* [from *infringere*.] Breach; violation.

The punishing of this *infringement* is proper to that jurisdiction against which the contempt is. *Clarendon.*

INFRINGER. *n. f.* [from *infringere*.] A breaker; a violator.

A clergyman's habit ought to be without any lace, under a severe penalty to be inflicted on the *infringers* of the provincial constitution. *Whiffle's Paragon.*

INFUNDIBULIFORM. *n. f.* [*infundibulum* and *formis*, Lat.] Of the shape of a funnel or tunnic.

INFURIATE. *adj.* [in and *furia*, Latin.] Enraged; raging.

At th' other bore, with touch of fire
Dilated and *infuriate*. *Milton.*
Fir'd by the torch of noon to tenfold rage,
Th' *infuriate* hill forth shoots the pillar'd flame. *Thomson.*

INFUSCA'TION. *n. f.* [*infuscatus*, Latin.] The act of darkening or blackening.

To INFUSE. *v. a.* [*infuser*, French; *infusus*, Latin.]

I N G

1. To pour in; to infill.

Thou almost mak'st me waver in my faith,
To hold opinion with Pythagoras,
That souls of animals *infuse* themselves
Into the trunks of men. *Shakefp. Merchant of Venice.*

My early miltrels, now my ancient muse,
That strong Circean liquor cease t' *infuse*,
Wherewith thou didst intoxicate my youth. *Denham.*

Why should he desire to have qualities *infused* into his son,
which himself never possessed? *Swift.*

Meat must be with money bought;
She therefore, upon second thought,
Infus'd, yet as it were by stealth,
Some small regard for state and wealth. *Swift.*

2. To pour into the mind; to inspire into.

For when God's hand had written in the hearts
Of our first parents all the rules of good,
So that their skill *infus'd* surpass'd all arts
That ever were before, or since the flood. *Davies;*

Sublime ideas, and apt words *infuse*;
The muse instruct my voice, and thou inspire the muse. *Rosce.*

He *infus'd*
Bad influence into th' unwary breast. *Milton.*

Infuse into their young breasts such a noble ardour as will
make them renowned. *Milton.*

3. To steep in any liquor with a gentle heat; to macerate so as to extract the virtues of any thing.

Take violets, and *infuse* a good pugil of them in a quart of vinegar. *Bacon's Natural History.*

4. To make an infusion with any ingredient; to supply, to tincture, to saturate with any thing infused.

Drink, *infus'd* with flesh, will nourish faster and easier than
meat and drink together. *Bacon's Natural History.*

5. To inspire with.

Thou didst smile,
Infus'd with a fortitude from heav'n. *Shakefp. Tempest.*

Infuse his breast with magnanimity,
And make him, naked, foil a man at arms. *Shakespeare.*

INFUSIBLE. *adj.* [from *infuse*.]

1. Possible to be infused.

From whom the doctrines being *infusible* into all, it will be
more necessary to forewarn all of the danger of them. *Flamm.*

2. Incapable of dissolution; not fusible.

Vitrification is the last work of fire, and a fusion of the salt
and earth, wherein the fusible salt draws the earth and *infusible*
part into one continuum. *Brown's Vulgar Errors.*

INFUSION. *n. f.* [*infusio*, French; *infusio*, Latin.]

1. The act of pouring in; infillation.

Our language has received innumerable elegancies and im-
provements from that *infusion* of Hebraisms, which are derived
to it out of the poetical passages in holy writ. *Addison.*

2. The act of pouring into the mine; inspiration.

We participate Christ partly by imputation, as when those
things which he did and suffered for us are imputed to us for
righteousness; partly by habitual and real *infusion*, as when grace
is inwardly bestowed on earth, and afterwards more fully both
our souls and bodies in glory. *Hooker.*

They found it would be matter of great debate, and spend
much time; during which they did not desire their company,
nor to be troubled with their *infusions*. *Clarendon.*

Here his folly and his wisdom are of his own growth, not the
echo or *infusion* of other men. *Swift.*

3. The act of steeping any thing in moisture without boiling.

Repeat the *infusion* of the body oftener. *Bacon.*

4. The liquor made by infusion.

To have the *infusion* strong, in those bodies which have finer
spirits, repeat the infusion of the body oftener. *Bacon.*

INFUSIVE. *adj.* [from *infuse*.] Having the power of infusion,
or being infused. A word not authorized.

Still let my song a nobler note assume,
And sing th' *infusive* force of Spring on man. *Thomson.*

INGATE. *n. f.* [in and *gate*.] Entrance; passage in.

One noble person stoppeth the *ingate* of all that evil which
is looked for, and holdeth in all those which are at his back. *Spenser on Ireland.*

INGANNA'TION. *n. f.* [*ingannare*, Italian.] Cheat; fraud; de-
ception; juggle; delusion; imposture; trick; flight. A word
neither used nor necessary.

Whoever shall resign their reasons, either from the root of
deceit in themselves, or inability to resist such trivial *inganna-
tions* from others, are within the line of vulgarity. *Bacon.*

INGATHERING. *n. f.* [in and *gathering*.] The act of getting
in the harvest.

Thou shalt keep the feast of *ingathering*, when thou hast ga-
thered in thy labours out of the field. *Ex. xxiii. 16.*

INGE, in the names of places, signifies a meadow, from the Saxon
ing, of the same import. *Gibson's Camden.*

To INGE'MINATE. *v. a.* [*ingemino*, Latin.] To double; to
repeat.

He would often *ingeminate* the word peace, peace. *Clar. n. in.*

INGEMINATION. *n. f.* [in and *geminatio*, Latin.] Repetition;
reduplication.

INGENDERER.

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Abridge

ABRIDGE', *verb transitive* abridj', [G. short, or its root, from the root of break or a verb of that family.]

1. To make shorter; to epitomize; to contract by using fewer words, yet retaining the sense in substance - used of writings.

Justin abridged the history of Trogus Pompeius.

2. To lessen; to diminish; as to *abridge* labor; to *abridge* power of rights.

3. To deprive; to cut off from; followed by of; as to *abridge* one of his rights, or enjoyments. to *abridge* from, is now obsolete or improper.

4. In algebra, to reduce a compound quantity or equation to its more simple expression. The equation thus abridged is called a formula.

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Infringe

INFRINGE, *verb transitive* infrinj'. [Latin *infringo*; *in* and *frango*, to break. See *Break*.]

1. To break, as contracts; to violate, either positively by contravention, or negatively by non-fulfillment or neglect of performance. A prince or a private person infringes an agreement or covenant by neglecting to perform its conditions, as well as by doing what is stipulated not to be done.
 2. To break; to violate; to transgress; to neglect to fulfill or obey; as, to *infringe* a law.
 3. To destroy or hinder; as, to *infringe* efficacy. [*Little Used*.]
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588

IN THE YEAR OF OUR LORD, 1805.

Proof of Fire-Arms.

ble inhabitant of said town of *Harrison*, requiring him to notify and warn the inhabitants of said town, who are qualified by law to vote in town affairs, to meet at such time and place as shall be expressed in said warrant, to choose all such officers as other towns within this Commonwealth are required by law to choose in the months of March or April annually; and the officers so chosen shall be qualified as other town officers are.

First meeting.

[This act passed March 8, 1805.]

CHAP. XXXV.

An act to provide for the proof of fire arms manufactured within this Commonwealth.

Preamble. **W**HEREAS no provision hath been made by law for the proof of fire arms manufactured in this Commonwealth, by which it is apprehended that many may be introduced into use which are unsafe, and thereby the lives of the citizens be exposed, to prevent which

SECT. 1. *BE it enacted by the Senate and House of Representatives, in General Court assembled, and by the authority of the same,* That the Governor, by and with the advice and consent of the Council, be, and he hereby is empowered to appoint, in any part of this Commonwealth where the manufacture of fire arms is carried on, suitable persons to be provers of fire arms, not exceeding two in any county, who shall be sworn to the faithful discharge of their trust, whose duty it shall be to prove all musket barrels and pistol barrels, which being sufficiently ground, bored and breeched, shall be offered to him to be proved; who shall prove the musket barrels twice in manner following, viz. first with a charge consisting of one eighteenth part of a pound of powder, one ounce of which, in a five & an half inch howitz, at an elevation of forty five degrees, will carry a twenty four pound shot, eighty yards, with a ball suited to the bore of the barrel; the second proof to be with a charge consisting of one twenty second part of the same powder, with a ball suited to the bore of the barrel; and shall prove the pistol barrels once with a charge consisting of one twenty second part of a pound of powder, one ounce of which, in a five and half inch howitz at an elevation of forty five degrees, will carry a twenty four pound shot seventy yards, with a ball suited to the bore of the barrel; which said powder and ball it shall be the duty of the prover to provide; and if the said musket and pistol barrels shall stand the proof aforesaid, and shall in no respect fail, then it shall be the duty of the said prover to stamp the same on the upper side, and within one and an half inches of the breech of said barrels, with a stamp consisting of the initial letters of the prover's name, and over those letters the letter P. also, in the line of the said initial letters, and further up said barrel the figures designating the year of our Lord in which the proof is made, and over the said figures the letter M. which said letters and figures shall be so deeply impressed on said barrel,

IN THE YEAR OF OUR LORD, 1805. 589

First Baptist Society in *Limington*.

as that the same cannot be erased or disfigured, and shall be in the form

^{P M}
 following AB 1805; and when any barrels shall burst or shall in any manner fail in the proving as aforesaid, so that in the opinion of the prover they are unfit for use, they shall not be stamped, but the said prover shall suffer the owner to take them away; and any prover so proving musket or pistol barrels as aforesaid, shall be entitled to receive from the owner, for each musket barrel *thirty three cents*, and for each pistol barrel *twenty five cents*, whether the same stand proof and are stamped or not. ^{fees.}

SECT. 2. *And be it further enacted*, That if any person, after the first day of June next, shall manufacture within this Commonwealth, any musket or pistol, without having the barrels proved and stamped as aforesaid, except such as are or may be manufactured in the armory of the *United States*, or in fulfilment of some contract made and entered into, or that may hereafter be made and entered into, for the manufacturing of fire arms for the *United States*, shall forfeit and pay for every such musket or pistol the sum of *ten dollars*, to be recovered in an action of debt, before any court proper to try the same, by any person who shall sue for and recover the same, to his own use. ^{Penalty for not having arms proved.}

SECT. 3. *And be it further enacted*, That if any person after the said first day of June next, shall sell and deliver, or shall knowingly purchase, any musket or pistol, which shall have been manufactured within this Commonwealth after the said first day of June next, which shall not have the marks of proof above required, the person so selling and the person so purchasing shall each forfeit the sum of *ten dollars*, to be recovered by action of debt before any court proper to try the same, to the use of any person who shall sue for and recover the same. ^{Penalty for selling or buying arms not proved.}

SECT. 4. *And be it further enacted*, That if any person shall falsely forge or alter the stamp of any prover of fire arms, so appointed as aforesaid, impressed on any musket or pistol barrel, pursuant to this act, and be convicted thereof before the Supreme Judicial Court, he shall be punished by fine, not exceeding *fifty dollars*, nor less than *twenty dollars*, according to the nature and aggravation of the offence. ^{Penalty for forging stamp}

[This act passed March 8, 1805.]

CHAP. XXXVI.

An act to incorporate a number of the inhabitants in the town of *Limington*, in the county of *York*, into a separate religious society, by the name of *The First Baptist Society in Limington*.

SECT. 1. *BE it enacted by the Senate and House of Representatives, in General Court assembled, and by the authority of the same*, That Ebenezer Clarke, James Marrs, Solomon Stone, William Chick, Barzillai

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1783 Mass. Acts 37, An Act in Addition to the Several Acts Already Made for the Prudent Storage of Gun Powder within the Tow...



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“That all cannon, swivels, mortars, howitzers, cohorns, fire arms, bombs, grenades, and iron shells of any kind, that shall be found in any dwelling-house, out-house, stable, barn, store, ware-house, shop, or other building, charged with, or having in them any gun-powder, shall be liable to be seized by either of the Firewards of the said Town: And upon complaint made by the said Firewards to the Court of Common Pleas, of such cannon, swivels, mortar, or howitzers, being so found, the Court shall proceed to try the merits of such complaint by a jury; and if the jury shall find such complaint supported, such cannon, swivel, mortar, or howitzer, shall be adjudged forfeit, and be sold at public auction.

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OF THE

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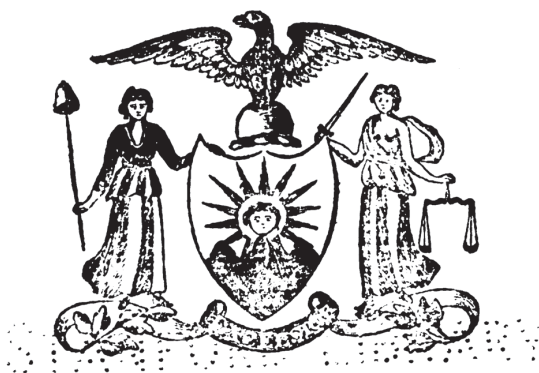
CONSTITUTION,

AND THE

ACTS OF THE LEGISLATURE,

SINCE THE REVOLUTION, FROM THE

FIRST TO THE FIFTEENTH SESSION, INCLUSIVE.



IN TWO VOLUMES.

VOLUME II.

Quam Leges alie super alias accumulatz, eas de integro retractare, et in Corpus sanum et habile redigere, ex Uti lit.
 BACON.

Mifera Servitus est ubi Jus est vagum aut incognitum.

4 Inst. 246.

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Inhabitants at their town-meetings may direct monies to be raised for repairing engines. *it further enacted by the authority aforesaid,* That it shall and may be lawful for the freeholders and inhabitants of the said town of Brooklyn residing within the limits aforesaid, at any town-meeting, to direct such sum or sums of money as they shall deem necessary and proper for the purpose aforesaid, to be raised, levied and collected, at the same time, and in the same manner as the monies for the maintenance and support of the poor, within the same town are by law directed to be raised, levied and collected, and to be paid into the hands of the town-clerk of the same town, to be by him paid and applied for the purposes aforesaid, at such times and times, and in such manner as the major part of the firemen aforesaid, shall from time to time direct and appoint.

C H A P. LXXXL

An ACT to prevent the storing of Gun-Powder, within certain Parts of the City of New-York.

Passed 15th March, 1788.

WHEREAS the practice of storing gun-powder within certain parts of the city of New-York, is dangerous to the safety of the said city ; Therefore,

I. Be it enacted by the people of the state of New-York, represented in senate and assembly, and it is hereby enacted by the authority of the same, That it

No person to keep more than 25 pounds of powder in any one place within one mile of the city-hall, and that to be divided into four parcels. shall not be lawful for any person or persons, to have or keep any quantity of gun-powder exceeding twenty-eight pounds weight, in any one place, house, store or out-house, less than one mile to the northward of the city-hall of the said city, except in the public magazine at the fresh-water, which said quantity of twenty-eight pounds, shall be separated in four stone jugs or tin canisters, each of which shall not contain more than seven pounds ; and if any person or persons shall keep any greater quantity than twenty-eight pounds, in any one place, house, store or out-house, or if the same gun-powder so permitted to be kept as aforesaid, shall not be separated in the manner herein above directed, he, she or they shall forfeit all such gun powder so kept, contrary to the true intent and meaning of this act, or so permitted to be kept, and which shall not be separated as aforesaid ; and shall also forfeit the sum of fifty pounds for every hundred weight of powder, and in that proportion for a greater or less quantity, to be recovered with costs of suit, in any court having cognizance thereof, by any person or persons who will sue for the same. Provided always, That all actions and suits to be commenced, sued or prosecuted, against any person or persons for any thing done contrary to this act, shall be commenced, sued or prosecuted within two calendar months next after the offence committed, and not at any time thereafter.

II. And to avoid dangers from gun-powder laden on board of any ship or other vessel, arriving from sea ; Be it further enacted by the authority aforesaid, That the commander or owner or owners of every

Commanders of vessels to land and store gun-powder within 24 hours after their arrival. ship or other vessel arriving from sea, and having gun-powder on board, shall, within twenty-four hours after her arrival in the harbour, and before such ship or other vessel be hauled along side of any wharf, pier or key within the said city, land the said gun-powder, by means of a boat or boats, or other small craft at any place on the East-

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River, east of the wharf now building by Thomas Buchanan, or at any place on the North-River, to the northward of the air-furnace, which may be most contiguous to any of the magazines, and shall cause the same to be stored in one of the magazines now built, or hereafter to be built for that purpose, on pain of forfeiting all such gun-powder to any person or persons who will sue and prosecute for the same to effect, in manner aforesaid.

III. And to prevent any evil consequences which may arise from the carriage of gun-powder, *Be it further enacted by the authority aforesaid,* That all gun-powder which shall be carried through the streets of the said city, by carts, carriages, or by hand, or otherwise, shall be in tight casks, well headed and hooped, and shall be put into bags or leather cases, and entirely covered therewith, so that no powder may be spilled or scattered in the passage thereof, on pain of forfeiting all such gun-powder as shall be conveyed through any of the streets aforesaid, in any other manner than is hereby directed; and it shall and may be lawful for any person or persons, to seize the same to his or their own use and benefit, and to convey the same to one of the magazines aforesaid, and thereupon to prosecute the person or persons offending against this act before the mayor or recorder, and any two aldermen of the said city; and such gun-powder shall upon conviction be condemned to the use of the person or persons seizing the same.

IV. *And be it further enacted by the authority aforesaid,* That it shall and may be lawful for the mayor or recorder, or any two aldermen of the said city, upon application made by any inhabitant or inhabitants of the said city, and upon his or their making oath of reasonable cause of suspicion (of the sufficiency of which the said mayor or recorder, or aldermen, is and are to be the judge or judges) to issue his or their warrant or warrants, under his or their hand and seal, or hands and seals, for searching for such gun-powder, in the day time, in any building or place whatsoever, within the limits aforesaid, or in any ship or other vessel, within forty-eight hours after her arrival in the harbour, or at any time after such ship or other vessel shall and may have hauled along side any wharf, pier or key, within the limits aforesaid: And that upon any such search it shall be lawful for the persons finding any such gun-powder, immediately to seize, and at any time within twelve hours after such seizure, to convey the same to one of the magazines aforesaid; and the same gun-powder being so removed, to detain and keep, until it shall be determined by the mayor or recorder and any two aldermen of the said city, whether the same is forfeited by virtue of this act: And the person or persons so detaining the same, shall not be subject or liable to any action or suit for the detention thereof. Provided always, That nothing in this clause of this act contained, shall be construed to authorize any person having such warrant, to take advantage of the same, for serving any civil process of any kind whatsoever. Provided also, That nothing in this act contained shall extend to ships of war, or packets in the service of the United States or any of them, or of any foreign prince or state; nor to authorize the searching for gun-powder on board of any such ship or vessel while laying in the stream, and upwards of one hundred yards from the wharf or shore.

V. *And be it further enacted by the authority aforesaid,* That if any gun-powder, exceeding twenty-eight pounds, shall be found in the custody of any person, during any fire or alarm of fire, in the said city, by any fireman of the said

Gun-powder exceeding 28lb. found during a fire, may be seized without warrant.

No gun-powder to be carried thro' the streets but in tight casks put in bags, on pain of forfeiting the same.

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GEORGE CLINTON, Esq. Governor. 1783

city, it shall be lawful for him to seize the same, without warrant from the mayor, or recorder or aldermen, and to cause the same to be condemned, in manner aforesaid, to his own use; any thing in this act to the contrary notwithstanding.

C H A P. LXXXII

An ACT to prevent the Destruction of Deer.

Passed 15th March, 1783.

I *BE it enacted by the people of the state of New-York, represented in senate and assembly, and it is hereby enacted by the authority of the same,*

Any person killing a deer in January, February, March, April, May, June or July, to forfeit 3l.

That if any person or persons shall kill or destroy any wild buck, doe or fawn, or any other sort of deer whatsoever, at any time in the months of January, February, March, April, May, June or July, every such person shall, for every buck, doe or fawn, or other deer so killed or destroyed as aforesaid, contrary to the true intent and meaning of this act, forfeit and pay the sum of three pounds, to be recovered with costs of suit, in any court having cognizance thereof, by any person or persons who will sue and prosecute for the same; the one moiety of which forfeiture, when recovered, to be paid to the overseers of the poor of the town or place where the offence shall be committed for the use of the poor thereof; and the other moiety to such person or persons as shall sue and prosecute for the same as aforesaid.

II. *And be it further enacted by the authority aforesaid,* That every person in whose custody shall be found, or who shall expose to sale any green deer skin, fresh venison, or deer's flesh, at any time in any of the months before mentioned, and shall be thereof convicted before any justice of the peace, by the oath of one credible witness, or by the confession of the party, shall, unless such party shall prove that some other person killed such buck, doe, fawn, or other deer, be deemed and adjudged guilty of the said offence.

III. *And in order the more easily to convict offenders against this act, Be it further enacted by the authority aforesaid,* That it shall be lawful for any justice of the peace in any county of this state, and every such justice is hereby required, upon demand made by any person, assigning a reasonable cause of suspicion, upon oath (of the sufficiency of which the said justice is to judge) at any time in any of the months before mentioned, to issue his warrant under his hand and seal, to any constable of any town or place in the same county, for searching in the day time in any house, store, out-house, or other place whatsoever, where any green deer skin, fresh venison or deer's flesh, is suspected to be concealed: And in case any green deer skin, fresh venison or deer's flesh, shall upon such search be found, the person in whose custody the same shall be found, or who concealed the same, shall forfeit the sum of three pounds, to be recovered and applied in manner aforesaid.

IV. *And be it further enacted by the authority aforesaid,* That if any person or persons shall at any time hunt, pursue or destroy any wild buck, doe, or fawn, or other deer (except in the county of Suffolk) with any blood-hound or blood-hounds, beagle or beagles, every such person shall, for every such offence, forfeit and pay the sum of three pounds, to be recovered and applied as aforesaid. Provided, That nothing in this clause of this act contained, shall be construed to prevent any person or persons from mak-

Vol. II.

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Exhibit 6

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1821 Me. Laws 98-99, An Act for the Prevention of Damage by Fire, and the Safe Keeping of Gun Powder, ch. 25, § 5 | Duke Ce...



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Subject(s):

- Storage (<https://firearmslaw.duke.edu/subjects/storage/>)

Jurisdiction(s):

- Maine (<https://firearmslaw.duke.edu/jurisdictions/maine/>)

Year(s):


- 1821 (<https://firearmslaw.duke.edu/years/1821/>)

Be it further enacted, That it shall, and may be lawful for any one or more of the Selectmen of any town to enter any building, or other place, in such town, to search for gun powder, which they may have reason to suppose to be concealed or kept, contrary to the rules and regulations which shall be established in such town, according to the provisions of this Act, first having obtained a search warrant therefor according to law.

-  (<https://twitter.com/dukefirearmslaw>)

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1821 Me. Laws 98-99, An Act for the Prevention of Damage by Fire, and the Safe Keeping of Gun Powder, ch. 25, § 5 | Duke Ce...

-  (<https://www.youtube.com/playlist?list=PLPIIY2puNnqYUNnmXwbGnQFKMSaLSVDoq>)
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Duke Center for Firearms Law | 210 Science Drive, Durham, NC 27708 | firearmslaw@law.duke.edu
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Questions or comments about the Repository of Historical Gun Laws can be sent to gunlaws@law.duke.edu
(<mailto:gunlaws@law.duke.edu>).

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11 Attorneys for Plaintiffs

12 **UNITED STATES DISTRICT COURT**
13 **SOUTHERN DISTRICT OF CALIFORNIA**

15 Lana Rae Renna; Danielle Jaymes; Laura
16 Schwartz; Michael Schwartz; Robert
17 Macomber; Clint Freeman; John Klier;
18 Justin Smith; John Phillips; Cheryl
19 Prince; Darin Prince; Ryan Peterson;
20 PWGG, L.P.; North County Shooting
21 Center, Inc.; Gunfighter Tactical, LLC;
22 Firearms Policy Coalition, Inc.; San
23 Diego County Gun Owners PAC;
24 Citizens Committee for the Right to
25 Keep and Bear Arms; and Second
26 Amendment Foundation,

Case No.: 20-cv-2190-DMS-DEB

**DECLARATION OF BRANDON
COMBS IN SUPPORT OF MOTION
FOR PRELIMINARY INJUNCTION**

Date: TBD
Time: TBD
Courtroom 13A (13th Floor)
Hon. Dana M. Sabraw

21 Plaintiffs,

22 v.

23 Robert Bonta, Attorney General of
24 California; and Luis Lopez, Director of
25 the California Department of Justice
26 Bureau of Firearms,

26 Defendants.

1 I, Brandon Combs, declare:

2 1. I have personal knowledge of the matters set forth in this declaration and
3 would be able to testify competently to these facts if called as a witness.

4 2. I am the CEO and President of Firearms Policy Coalition (“FPC”).

5 3. FPC is a non-profit organization incorporated under the laws of Delaware
6 with its principal place of business in Clark County, Nevada.

7 4. As set forth in the organization’s founding documents, the purposes of
8 FPC are:

9 a. To protect and defend the Constitution of the United States and the
10 People's rights, privileges and immunities deeply rooted in this Nation's
11 history and tradition, especially the inalienable, fundamental, and
12 individual right to keep and bear arms;

13 b. To protect, defend, and advance the means and methods by which the
14 People of the United States may exercise those rights, including, but not
15 limited to, the acquisition, collection, transportation, exhibition, carry,
16 care, use, and disposition of arms for all lawful purposes, including, but
17 not limited to, self-defense, hunting, and service in the appropriate militia
18 for the common defense of the Republic and the individual liberty of its
19 citizens;

20 c. To foster and promote the shooting sports and all lawful uses of arms;
21 and,

22 d. To foster and promote awareness of, and public engagement in, all of the
23 above.

24 5. FPC’s efforts are focused on the right to keep and bear arms and adjacent
25 issues including freedom of speech, due process, unlawful searches and seizures,
26 separation of powers, asset forfeitures, privacy, encryption, and limited government.

27 6. FPC works to achieve the Organization’s mission—defending and
28 promoting the People’s rights, especially the fundamental, individual Second

1 Amendment right to keep and bear arms, advancing individual liberty, and restoring
2 freedom—through litigation, research, scholarly publications, amicus briefing,
3 legislative and regulatory action, grassroots activism, education, outreach, and other
4 programs.

5 7. FPC Law (FPCLaw.org) is the nation’s first and largest public interest
6 legal team focused on the right to keep and bear arms and the leader in the Second
7 Amendment litigation and research space.

8 8. The constitutional rights and interests that FPC seeks to protect in this
9 lawsuit are germane to the organization’s purposes.

10 9. FPC typically has members and supporters in all 50 U.S. States and the
11 District of Columbia. See <https://www.firearmspolicy.org/about>.

12 10. Plaintiffs Lana Rae Renna, Danielle Jaymes, Laura Schwartz, Michael
13 Schwartz, John Klier, Justin Smith, John Phillips, Cheryl Prince, Darin Prince, Ryan
14 Peterson, PWGG, L.P., North County Shooting Center, Inc., and Gunfighter Tactical,
15 LLC, are members of FPC.

16 11. FPC has law-abiding members in the State of California, like and
17 including the named Individual Plaintiffs, who desire to purchase constitutionally
18 protected arms for self-defense or other lawful purposes but cannot because the arms
19 are not currently on or eligible under California’s Unsafe Handgun Act to be added to
20 Defendants’ Handgun Roster.

21 12. FPC has law-abiding members in the State of California, like and
22 including the named Retailer Plaintiffs, who desire to sell constitutionally protected
23 arms for self-defense or other lawful purposes but cannot because the arms are not
24 currently on or eligible under California’s Unsafe Handgun Act to be added to
25 Defendants’ Handgun Roster.


26 13. These individual and retailer members would each undertake the desired
27 and protected activity but for the criminal liability that they face under the laws,
28 regulations, policies, practices, and customs being challenged in this action.

1 14. FPC represents its members and supporters, who include gun owners,
2 prospective gun owners, licensed California firearm retailers, and others, and brings
3 this action on behalf of its members and similarly situated members of the public.

4 15. FPC’s members and similarly situated members of the public have been
5 adversely and directly harmed by Defendants’ enforcement of the laws, regulations,
6 policies, practices, and customs challenged in this case.

7 I declare under penalty of perjury under the laws of the United States America
8 and State of California that the foregoing is true and correct. Executed on December
9 22, 2022.

DocuSigned by:



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BRANDON COMBS

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14 Attorneys for Plaintiffs

15 **UNITED STATES DISTRICT COURT**
16 **SOUTHERN DISTRICT OF CALIFORNIA**

17 Lana Rae Renna; Danielle Jaymes; Laura
18 Schwartz; Michael Schwartz; Robert
19 Macomber; Clint Freeman; John Klier;
20 Justin Smith; John Phillips; Cheryl
21 Prince; Darin Prince; Ryan Peterson;
22 PWGG, L.P.; North County Shooting
23 Center, Inc.; Gunfighter Tactical, LLC;
24 Firearms Policy Coalition, Inc.; San
25 Diego County Gun Owners PAC;
26 Citizens Committee for the Right to
27 Keep and Bear Arms; and Second
28 Amendment Foundation,

Case No.: 20-cv-2190-DMS-DEB

**DECLARATION OF ALAN
GOTTLIEB IN SUPPORT OF
MOTION FOR PRELIMINARY
INJUNCTION**

Date:
Time:
Courtroom 13A (13th Floor)
Hon. Dana M. Sabraw

Plaintiffs,

v.

Robert Bonta, Attorney General of
California; and Luis Lopez, Director of
the California Department of Justice
Bureau of Firearms,

Defendants.

1 I, Alan Gottlieb, declare:

2 1. I have personal knowledge of the matters set forth in this declaration, and
3 would be able to testify competently to these facts if called as a witness.

4 2. I am the Executive Vice President of the Second Amendment
5 Foundation, Inc. (“SAF”) and the Chairman of the Citizens Committee for the Right
6 to Keep and Bear Arms (“CCRKBA”).

7 3. SAF is a non-profit educational foundation incorporated under the laws
8 of Washington with its principal place of business in Bellevue, Washington. SAF
9 seeks to preserve the effectiveness of the Second Amendment through educational and
10 legal action programs. SAF has over 720,000 members and supporters nationwide,
11 including thousands of members in California and many in the County of San Diego,
12 California. SAF’s members include Individual Plaintiffs who desire to purchase
13 constitutionally protected arms for self-defense or other lawful purposes which are not
14 currently on or eligible under the Unsafe Handgun Act to be added to Defendants’
15 Handgun Roster, and Retailer Plaintiffs who desire to sell the same to their eligible
16 law-abiding customers. These members would each undertake the desired and
17 protected activity but for the criminal liability that they face under the laws,
18 regulations, policies, practices, and customs being challenged in this action.

19 4. CCRKBA is a nonprofit organization incorporated under the laws of
20 Washington with its principal place of business in Bellevue, Washington. CCRKBA
21 is dedicated to promoting the benefits of the right to bear arms. CCRKBA has
22 thousands of members throughout California, including many in the County of San
23 Diego, California. CCRKBA’s members include Individual Plaintiffs who desire to
24 purchase constitutionally protected arms for self-defense or other lawful purposes
25 which are not currently on or eligible under the Unsafe Handgun Act to be added to
26 Defendants’ Handgun Roster and Retailer Plaintiffs who desire to sell the same to
27 their eligible law-abiding customers. These members would each undertake the
28 desired and protected activity but for the criminal liability that they face under the

1 laws, regulations, of perjury under the laws of the United States America and State of
2 California that the foregoing is true and correct. Executed December 21, 2022.

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7 _____
8 ALAN GOTTLIEB
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11 Attorneys for Plaintiffs

12 **UNITED STATES DISTRICT COURT**
13 **SOUTHERN DISTRICT OF CALIFORNIA**

15 Lana Rae Renna; Danielle Jaymes; Laura
16 Schwartz; Michael Schwartz; Robert
17 Macomber; Clint Freeman; John Klier;
18 Justin Smith; John Phillips; Cheryl
19 Prince; Darin Prince; Ryan Peterson;
20 PWGG, L.P.; North County Shooting
21 Center, Inc.; Gunfighter Tactical, LLC;
22 Firearms Policy Coalition, Inc.; San
23 Diego County Gun Owners PAC;
24 Citizens Committee for the Right to
25 Keep and Bear Arms; and Second
26 Amendment Foundation,

Case No.: 20-cv-2190-DMS-DEB

**DECLARATION OF JOHN
PHILLIPS IN SUPPORT OF
MOTION FOR PRELIMINARY
INJUNCTION**

Date: TBD
Time: TBD
Courtroom 13A (13th Floor)
Hon. Dana M. Sabraw

Plaintiffs,

v.

Robert Bonta, Attorney General of
California; and Luis Lopez, Director of
the California Department of Justice
Bureau of Firearms,

Defendants.

1 I, John Phillips, declare:

2 1. I have personal knowledge of the matters set forth in this declaration, and
3 would be able to testify competently to these facts if called as a witness.

4 2. I am the President and Founder of PWGG L.P., doing business as Poway
5 Weapons & Gear and PWG Range (“PWGG”), a firearms dealership in Poway,
6 California. PWGG is listed as a firearms dealer in the California Department of
7 Justice’s Centralized List of Firearms Dealers, and I am an individual licensee
8 associated with the dealership. PWGG operates one of the largest indoor gun ranges
9 in the country. We serve over 200,000 people a year in our retail store, over 80,000
10 on our ranges, and over 8,000 students receive training and education related to
11 firearms safety and utilization. PWGG also serves federal, state, and local law
12 enforcement agencies and military personnel.

13 3. Through my work in the firearms business, I have become very familiar
14 with the California handgun roster’s ban on hundreds of models of handguns in
15 common use throughout the rest of the nation.

16 4. I have obtained this knowledge in multiple ways.

17 5. For example, I am a member of a nationwide buying group called Nations
18 Best Sporting (“NBS”), which consists of more than 450 retail members from all 50
19 states; NBS members order more than \$1 billion in firearms annually. I regularly
20 attend the two large shows that NBS organizes each year. All major firearms
21 manufacturers participate in these shows by displaying their products and talking to
22 members about them. I make over 80% of my inventory orders for PWGG at these
23 shows.

24 6. I also serve on the retail advisory board for Smith & Wesson Brands, Inc.
25 The retail advisory board consists of diverse dealers from across the county
26 representing the various geographic locations of their range or retail stores. The
27 advisory board is use by Smith & Wesson to better understand the market needs,
28 challenges and future purchasing trends from the retail level. The board meets four

1 times a year, twice in person and twice via video conference. Through my service on
2 this board, I have become intimately familiar with the fact that California's roster
3 allows the sale of only one Smith & Wesson semiautomatic handgun in California. I
4 am further aware that since 2014, Smith & Wesson has created approximately 650
5 new semi-automatic handgun SKUs that were ineligible to be added to the Roster due
6 to the lack of feature(s) required by California state law. These SKUs cover a total of
7 31 unique models of semi-automatic handguns.

8 7. I routinely meet with manufacturer representatives of all major firearms
9 manufacturers who visit PWGG to sell their products. We regularly discuss the
10 limitations imposed by California's roster on the availability of handguns in California
11 compared to the rest of the nation. In addition, I have access to retailers' online sales
12 portals, which allows me to view the handguns that are offered for sale outside of
13 California.

14 8. I regularly review publications describing handguns available and
15 commonly used throughout the nation. Included among these are industry magazines
16 such as Shot Business and Shooting Retailer, each of which lists firearms available
17 and in common use throughout the nation. I also receive and read a magazine called
18 Concealed Carry (published by the U.S. Concealed Carry Association, which provides
19 insurance, education, and training on concealed-carry and armed self-defense) that
20 includes advertising from all major manufacturers.

21 9. I am aware that California law now imposes a microstamping
22 requirement (in addition to the chamber load indicator ("CLI") and magazine
23 disconnect mechanism ("MDM") requirements) in order for a new handgun model to
24 be added to the Roster. But there are no commercially available semiautomatic
25 handguns manufactured in the United States that have all three requirements (the
26 microstamping technology, CLI, and MDM). As a result, literally no new *models* of
27 handguns have been added to the Roster since 2013. And since any change to a
28 handgun design requires a new approval to be added to the roster, the few additions

1 to the roster in recent years have consisted of slight (mostly cosmetic) changes to
2 models of handguns that have already been approved.

3 10. Overall, there has been a dramatic shrinkage of guns listed on the roster
4 since 2013. To the best of my recollection, there were nearly 1,300 makes, models,
5 and permutations of approved handguns on the Roster, but the list has steadily
6 declined over the past decade. The total number of approved handguns now stands at
7 just over 800.

8 11. While gun manufacturers innovate and release newer firearm models
9 with improved features that are freely purchased throughout the country, Californians
10 are left to choose from a shrinking list of aging handgun models that may not be
11 suitable for their self-defense needs.

12 12. Glock products provide an example of the perverse impact of the roster.
13 No Glock semiautomatic handguns after Glock's "Generation 3" line are available
14 because they are not on the roster. (Generation 3 was first introduced to the market in
15 the late 1990s.) Glock has already released and moved on from its very popular
16 "Generation 4" series of semiautomatic handguns (first released in 2010), and is now
17 producing a series of very popular "Generation 5" semiautomatic handguns, none of
18 which are available in California. This means, among other things, that as Glock
19 makes safety and other technical improvements with its new lines, Californians are
20 unable to benefit from those improvements. The Gen5 handguns are much safer than
21 the Gen3. The Gen5 is also much more reliable and has better ergonomics than the
22 Gen3. The Glock G43 is one of the top-selling firearms designed for concealed carry
23 that is in common use throughout the country, but it is banned from the Roster. I have
24 been told by Glock representatives that the only reason it keeps making the Generation
25 3 weapons is that they are the only Glock weapons that Californians can purchase.

26 13. I am further aware that the Sig Sauer 320 is the most popular carry gun
27 in the nation, but it is not available to Californians because it is not on the Roster. The
28 Sig 32 and Sig 365 are better than any concealed carry weapon on Defendants' Roster.

1 They both have much newer technology and better ergonomics than any concealed
2 carry weapon on the Roster. The newer technology includes additional safety features
3 that help the functionality of both firearms. Likewise, the Springfield Armory
4 Hellcat—one of the most popular semiautomatic firearms in the country for concealed
5 carry—is not available in California.

6 14. There is nothing currently on Defendants’ Roster like the Fabrique
7 National Herstal 509 and FNX-9. These are home protection and concealed carry
8 firearms. There is no gun on Defendants’ Roster that is comparable in size and
9 functionality to the FN 509 and FNX-9. These guns have better ergonomics than the
10 guns on the Roster. This is a unique and high-end firearm. The FN 5.7 is the only FN
11 pistol available on the Roster and it is not a common caliber of gun.

12 15. The Roster’s requirements have also prohibited newer models of
13 semiautomatic handguns that have ambidextrous configurations, which make them
14 more suitable for left-handed customers. The Roster’s restrictions pose particular
15 constraints for females, who are the fastest-growing demographic of new gun
16 purchasers, but are unable to purchase new models designed primarily for females.

17 16. But for California’s handgun ban and Defendants’ active enforcement
18 thereof, I would purchase for self-defense and other lawful purposes a Sig 365, Sig
19 320 M17, Glock 17 Gen 5 MOS, FN 509, and/or FNX-9, all of which are handguns
20 in common use for self-defense and lawful purposes and widely sold and possessed
21 outside of California.

22 17. Because the handguns that I seek to purchase for lawful purposes are
23 currently excluded from Defendants’ Roster of purportedly “safe” handguns,
24 California’s Handgun Ban bars me from purchasing and taking possession of such
25 handguns from a licensed retailer, who are likewise prohibited from selling them to
26 me on pain of criminal sanction. I have no other lawful method of purchasing these
27 handguns in California.

28

1 18. Aside from the particular guns that I would like to purchase but cannot,
2 I am aware that the roster bans many hundreds, and likely thousands, of other models
3 of handguns in common use throughout the United States, as discussed above.

4 19. Further, as the proprietor of Plaintiff PWGG, but for California’s
5 Handgun Ban and Defendants’ active enforcement thereof, I would make
6 commercially available all handguns in common use for self-defense and other lawful
7 purposes that are widely sold and possessed outside of California, which are currently
8 excluded from Defendants’ handgun roster, and sell and transfer them to law-abiding
9 customers.

10 20. Prospective customers regularly visit PWGG and seek weapons to fit
11 their particularized needs—as a result of physical disabilities and other limitations,
12 including strength, size, and build—for weapons that are not available in California
13 due to the roster.

14 21. I hold an active license to carry a CCW issued by my county sheriff under
15 Penal Code § 26150, *et seq.*, after proving “good cause” and “good moral character”
16 to that licensing authority, successfully completing a course of training on the law and
17 firearms proficiency under § 26165, passing an extensive Live Scan-based
18 Department of Justice background check, and placement into the “Rap Back” system
19 for monitoring law enforcement contact, arrests, and criminal convictions. I also
20 possess a current COE issued by the Defendants’ Department of Justice Bureau of
21 Firearms. I am also a trained firearms instructor.

22 I declare under penalty of perjury under the laws of the United States America
23 and State of California that the foregoing is true and correct. Executed December 22,
24 2022.

DocuSigned by:
John Phillips
783A8B938CD1479...
JOHN PHILLIPS

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12 Attorneys for Plaintiffs

13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15 Lana Rae Renna; Danielle Jaymes; Laura
16 Schwartz; Michael Schwartz; Robert
Macomber; Clint Freeman; John Klier;
17 Justin Smith; John Phillips; Cheryl
Prince; Darin Prince; Ryan Peterson;
18 PWGG, L.P.; North County Shooting
Center, Inc.; Gunfighter Tactical, LLC;
19 Firearms Policy Coalition, Inc.; San
Diego County Gun Owners PAC;
20 Citizens Committee for the Right to
Keep and Bear Arms; and Second
21 Amendment Foundation,

22 Plaintiffs,

23 v.

24 Robert Bonta, Attorney General of
California; and Luis Lopez, Director of
25 the California Department of Justice
Bureau of Firearms,
26

27 Defendants.
28

Case No.: 20-cv-2190-DMS-DEB

**DECLARATION OF LANA RAE
RENNA IN SUPPORT OF MOTION
FOR PRELIMINARY INJUNCTION**

Date:
Time:
Courtroom 13A (13th Floor)
Hon. Dana M. Sabraw

1 I, Lana Rae Renna, declare:

2 1. I have personal knowledge of the matters set forth in this declaration, and
3 would be able to testify competently to these facts if called as a witness.

4 2. I am not prohibited under state or federal law from possessing, receiving,
5 owning, or purchasing a firearm.

6 3. I am a member and supporter of Plaintiffs FIREARMS POLICY
7 COALITION, SAN DIEGO COUNTY GUN OWNERS PAC, CITIZENS
8 COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS, and SECOND
9 AMENDMENT FOUNDATION.

10 4. But for California's Handgun Ban and Defendants' active enforcement
11 thereof, I would purchase for self-defense and other lawful purposes a Smith &
12 Wesson M&P® 380 SHIELD™ EZ®, which is a handgun in common use for self-
13 defense and other lawful purposes and widely sold and possessed outside of
14 California. I have a damaged tendon in my right thumb that impacts my ability to
15 apply physical force.

16 5. The Smith & Wesson M&P® 380 SHIELD™ EZ® is specifically
17 designed for those with limited hand strength. I would be able to use this gun more
18 safely and accurately than the guns currently available to purchase on Defendants'
19 Roster.

20 6. Because the handgun that I seek to purchase for lawful purposes is
21 currently excluded from Defendants' Roster of purportedly "not unsafe" handguns,
22 California's Handgun Ban bars me from purchasing and taking possession of it from
23 a licensed retailer, who are likewise prohibited from selling them to me on pain of
24 criminal sanction.

25 7. Other than buying this handgun through a licensed retailer, I have no
26 other lawful method of purchasing these handguns in California.

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I declare under penalty of perjury under the laws of the United States America
and State of California that the foregoing is true and correct. Executed December 21,
2022.



LANA RAE RENNA

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11 Attorneys for Plaintiffs

12 **UNITED STATES DISTRICT COURT**
13 **SOUTHERN DISTRICT OF CALIFORNIA**

15 Lana Rae Renna; Danielle Jaymes; Laura
16 Schwartz; Michael Schwartz; Robert
17 Macomber; Clint Freeman; John Klier;
18 Justin Smith; John Phillips; Cheryl
19 Prince; Darin Prince; Ryan Peterson;
20 PWGG, L.P.; North County Shooting
21 Center, Inc.; Gunfighter Tactical, LLC;
22 Firearms Policy Coalition, Inc.; San
23 Diego County Gun Owners PAC;
24 Citizens Committee for the Right to
25 Keep and Bear Arms; and Second
26 Amendment Foundation,

21 Plaintiffs,

22 v.

24 Robert Bonta, Attorney General of
25 California; and Luis Lopez, Director of
26 the California Department of Justice
27 Bureau of Firearms,

26 Defendants.

Case No.: 20-cv-2190-DMS-DEB

**DECLARATION OF MICHAEL
SCHWARTZ IN SUPPORT OF
MOTION FOR PRELIMINARY
INJUNCTION**

Date: TBD
Time: TBD
Courtroom 13A (13th Floor)
Hon. Dana M. Sabraw

1 I, Michael Schwartz, declare:

2 1. I have personal knowledge of the matters set forth in this declaration, and
3 would be able to testify competently to these facts if called as a witness.

4 2. I am not prohibited under state or federal law from possessing, receiving,
5 owning, or purchasing a firearm.

6 3. I hold an active license to carry a concealed weapon (“CCW”) issued by
7 my county sheriff, after proving “good cause” and “good moral character” to my
8 licensing authority, successfully completing a course of training on the law and
9 firearms proficiency under § 26165 and passing an extensive Live Scan-based
10 background check and placement into the State’s system for monitoring law
11 enforcement contact, arrests, and criminal convictions (“Rap Back”).

12 4. I am the Executive Director of Plaintiff San Diego County Gun Owners
13 PAC (“SDCGO”), a local political organization whose purpose is to protect and
14 advance the Second Amendment rights of residents of San Diego County, California,
15 through their efforts to support and elect local and state representatives who support
16 the Second Amendment right to keep and bear arms. SDCGO’s membership and
17 donors consist of Second Amendment supporters, people who own guns for self-
18 defense and sport, firearms dealers, shooting ranges, and elected officials who want
19 to restore and protect the right to keep and bear arms in California. SDCGO’s
20 members include Individual Plaintiffs who desire to purchase new constitutionally
21 protected arms for self-defense or other lawful purposes which are not currently on or
22 eligible under the Unsafe Handgun Act to be added to Defendants’ Handgun Roster,
23 and Retailer Plaintiffs who desire to sell the same to their eligible law-abiding
24 customers. These members would each undertake the desired and protected activity
25 but for the criminal liability that they face under the laws, regulations, policies,
26 practices, and customs being challenged in this action.

27 5. I am a member and supporter of Plaintiffs FIREARMS POLICY
28 COALITION, SAN DIEGO COUNTY GUN OWNERS PAC, CITIZENS

1 COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS, and SECOND
2 AMENDMENT FOUNDATION.

3 6. But for California’s Handgun Ban and Defendants’ active thereof, I
4 would purchase for self-defense and other lawful purposes a Glock 19 Gen5 and/or
5 Springfield Armory Hellcat, which are both handguns in common use for self-defense
6 and other lawful purposes and widely sold and possessed outside of California.

7 7. I would also like to self-build a handgun based on a common,
8 commercially available platform compatible with the Glock 43 design, such as the
9 “SS80” available from GlockStore.com, a retailer of products based at 4770 Ruffner
10 Street in San Diego, California, at <https://www.glockstore.com/SS80-MModel>, for
11 self-defense and other lawful purposes, including sport, but cannot because
12 California’s Handgun Ban and Defendants’ enforcement thereof bars me from doing
13 so under pain of criminal sanction.

14 8. I wish to purchase the Glock 19 Gen5 because of the ambidextrous slide
15 release. This is crucial to my gun safety training. I specifically train to be able to use
16 both my right hand and my left hand to safely shoot a gun for self-defense purposes.
17 If I were to shoot with my left hand using the current Glock 19 Gen3 on Defendants’
18 Roster, it would be very unsafe because there is no left-handed slide release.
19 Additionally, the Glock 19 Gen3 does not come with adjustable backstraps. I have
20 unusually shaped hands and in order to get a solid and safe grip on the gun, I need the
21 adjustable hand straps. The Glock 19 Gen5 provides adjustable straps that makes it
22 more accurate for me to shoot and safer for me to shoot.

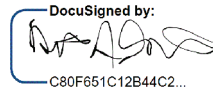
23 9. I wish to purchase the Springfield Armory Hellcat because it is a more
24 appropriate concealed carry handgun that still holds 10 rounds. I am not able to
25 purchase a suitable concealed carry weapon that still holds 10 rounds on Defendants’
26 Roster.

27 10. Because the handguns that I seek to purchase for lawful purposes are
28 currently excluded from Defendants’ Roster of purportedly “safe” handguns,

1 California's Handgun Ban bars me from purchasing and taking possession of such
2 handguns from a licensed retailer, who are likewise prohibited from selling them to
3 me on pain of criminal sanction.

4 11. Other than buying these handguns through a licensed retailer, I have no
5 other lawful method of purchasing these handguns in California.

6 I declare under penalty of perjury under the laws of the United States America
7 and State of California that the foregoing is true and correct. Executed December 22,
8 2022.

9  DocuSigned by:
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10 MICHAEL SCHWARTZ
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*Attorneys for Defendants Attorney General
8 Rob Bonta and Acting Director Allison
Mendoza, in their official capacities*

9
10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
12
13

14 **LANA RAE RENNA et al.,**

15 Plaintiffs,

16 v.

17 **ROB BONTA, in his official capacity**
18 **as Attorney General of California;**
19 **and ALLISON MENDOZA,¹ in her**
20 **official capacity as Acting Director of**
21 **the Department of Justice Bureau of**
22 **Firearms,**

23 Defendants.

3:20-cv-02190-DMS-DEB

**ANSWER TO THIRD AMENDED
COMPLAINT**

Judge: The Honorable Dana
Makato Sabraw

Trial Date: None set
Action Filed: 11/10/2020

24 Defendants Rob Bonta, in his official capacity as Attorney General, and
25 Allison Mendoza, in her official capacity as Acting Director of the Department of
26 Justice Bureau of Firearms, hereby respond to Plaintiffs' Third Amended
27 Complaint for Declaratory and Injunctive Relief ("TAC") as follows.

28 ¹ Allison Mendoza is hereby substituted for former Bureau of Firearms
Acting Director Blake Graham. See Fed. R. Civ. P. 25(d).

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ANSWER TO INTRODUCTION

1. In response to the allegations in paragraph 1 of the TAC quoting and interpreting the Second Amendment of the United States, that legal authority speaks for itself. In response to the allegations in paragraph 1 of the TAC regarding Plaintiffs, Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, deny them.

2. Paragraph 2 of the TAC consists of legal argument and/or conclusions that do not require admission or denial. To the extent admission or denial is required, Defendants deny all allegations.

3. Paragraph 3 of the TAC consists of legal argument and/or conclusions that do not require admission or denial. To the extent admission or denial is required, Defendants deny all allegations. With respect to any citation or quotation of a legal authority, that authority speaks for itself.

4. Paragraph 4 of the TAC consists of legal argument and/or conclusions that do not require admission or denial. To the extent admission or denial is required, Defendants deny all allegations. With respect to any citation or quotation of a legal authority, that authority speaks for itself.

5. Paragraph 5 of the TAC consists of legal argument and/or conclusions that do not require admission or denial. To the extent admission or denial is required, Defendants deny all allegations. With respect to any citation or quotation of a legal authority, that authority speaks for itself.

6. Paragraph 6 of the TAC consists of a quotation of a legal authority. That legal authority speaks for itself. To the extent admission or denial is required, Defendants deny all allegations.

7. Paragraph 7 of the TAC consists of legal argument and/or conclusions that do not require admission or denial. To the extent admission or denial is required, Defendants deny all allegations. With respect to any citation or quotation of a legal authority, that authority speaks for itself.

1 8. Paragraph 8 of the TAC consists of legal argument and/or conclusions
2 that do not require admission or denial. To the extent admission or denial is
3 required, Defendants deny all allegations.

4 9. Paragraph 9 of the TAC consists of a quotation of a legal authority. That
5 legal authority speaks for itself. To the extent admission or denial is required,
6 Defendants deny all allegations.

7 10. Paragraph 10 of the TAC consists of legal argument and/or conclusions
8 that do not require admission or denial. To the extent admission or denial is
9 required, Defendants deny all allegations.

10 11. Paragraph 11 of the TAC consists of legal argument and/or conclusions
11 that do not require admission or denial. To the extent admission or denial is
12 required, Defendants deny all allegations. With respect to any citation or quotation
13 of a legal authority, that authority speaks for itself.

14 12. Paragraph 12 of the TAC consists of legal argument and/or conclusions
15 that do not require admission or denial. To the extent admission or denial is
16 required, Defendants deny all allegations. With respect to any citation or quotation
17 of a legal authority, that authority speaks for itself.

18 13. Paragraph 13 of the TAC consists of a quotation of a legal authority.
19 That legal authority speaks for itself. To the extent admission or denial is required,
20 Defendants deny all allegations.

21 14. Paragraph 14 of the TAC consists of a quotation of a legal authority.
22 That legal authority speaks for itself. To the extent admission or denial is required,
23 Defendants deny all allegations.

24 15. Paragraph 15 of the TAC consists of legal argument and/or conclusions
25 that do not require admission or denial. To the extent admission or denial is
26 required, Defendants deny all allegations.

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1 16. Paragraph 16 of the TAC consists of legal argument and/or conclusions
2 that do not require admission or denial. To the extent admission or denial is
3 required, Defendants deny all allegations.

4 **ANSWER TO ALLEGATIONS ON PARTIES**

5 17. In response to paragraph 17 of the TAC, Defendants lack knowledge or
6 information sufficient to form a belief as to the truth of the allegations and,
7 therefore, deny them.

8 18. In response to paragraph 18 of the TAC, Defendants deny that the “Smith
9 & Wesson M&P® 380 SHIELD™ EZ® that Plaintiff Renna wishes to purchase is
10 a constitutionally protected handgun.” In response to the remaining allegations,
11 Defendants lack knowledge or information sufficient to form a belief as to the truth
12 of the allegations and, therefore, deny them.

13 19. In response to paragraph 19 of the TAC, Defendants deny that any
14 particular make or model of handgun is “constitutionally protected.” In response to
15 the remaining allegations, Defendants lack knowledge or information sufficient to
16 form a belief as to the truth of the allegations and, therefore, deny them.

17 20. In response to paragraph 20 of the TAC, Defendants lack knowledge or
18 information sufficient to form a belief as to the truth of the allegations and,
19 therefore, deny them.

20 21. In response to paragraph 21 of the TAC, Defendants deny that any
21 particular make or model of handgun is “constitutionally protected.” In response to
22 the remaining allegations, Defendants lack knowledge or information sufficient to
23 form a belief as to the truth of the allegations and, therefore, deny them.

24 22. In response to paragraph 22 of the TAC, Defendants lack knowledge or
25 information sufficient to form a belief as to the truth of the allegations and,
26 therefore, deny them.

27 23. In response to paragraph 23 of the TAC, Defendants deny that any
28 particular make or model of handgun is “constitutionally protected.” In response to

1 the remaining allegations, Defendants lack knowledge or information sufficient to
2 form a belief as to the truth of the allegations and, therefore, deny them.

3 24. In response to paragraph 24 of the TAC, Defendants lack knowledge or
4 information sufficient to form a belief as to the truth of the allegations and,
5 therefore, deny them.

6 25. In response to paragraph 25 of the TAC, Defendants deny that any
7 particular make or model of handgun is “constitutionally protected.” In response to
8 the remaining allegations, Defendants lack knowledge or information sufficient to
9 form a belief as to the truth of the allegations and, therefore, deny them.

10 26. In response to paragraph 26 of the TAC, including footnote 3,
11 Defendants lack knowledge or information sufficient to form a belief as to the truth
12 of the allegations and, therefore, deny them.

13 27. In response to paragraph 27 of the TAC, Defendants deny that any
14 particular make or model of handgun is “constitutionally protected.” In response to
15 the remaining allegations, Defendants lack knowledge or information sufficient to
16 form a belief as to the truth of the allegations and, therefore, deny them.

17 28. In response to paragraph 28 of the TAC, Defendants lack knowledge or
18 information sufficient to form a belief as to the truth of the allegations and,
19 therefore, deny them.

20 29. In response to paragraph 29 of the TAC, Defendants deny that any
21 particular make or model of handgun is “constitutionally protected.” In response to
22 the remaining allegations, Defendants lack knowledge or information sufficient to
23 form a belief as to the truth of the allegations and, therefore, deny them.

24 30. In response to paragraph 30 of the TAC, Defendants lack knowledge or
25 information sufficient to form a belief as to the truth of the allegations and,
26 therefore, deny them.

27 31. In response to paragraph 31 of the TAC, Defendants deny that any
28 particular make or model of handgun is “constitutionally protected.” In response to

1 the remaining allegations, Defendants lack knowledge or information sufficient to
2 form a belief as to the truth of the allegations and, therefore, deny them.

3 32. In response to paragraph 32 of the TAC, Defendants lack knowledge or
4 information sufficient to form a belief as to the truth of the allegations and,
5 therefore, deny them.

6 33. In response to paragraph 33 of the TAC, Defendants deny that any
7 particular make or model of handgun is “constitutionally protected.” In response to
8 the remaining allegations, Defendants lack knowledge or information sufficient to
9 form a belief as to the truth of the allegations and, therefore, deny them.

10 34. In response to paragraph 34 of the TAC, Defendants lack knowledge or
11 information sufficient to form a belief as to the truth of the allegations and,
12 therefore, deny them.

13 35. In response to paragraph 35 of the TAC, Defendants deny that any
14 particular make or model of handgun is “constitutionally protected.” In response to
15 the remaining allegations, Defendants lack knowledge or information sufficient to
16 form a belief as to the truth of the allegations and, therefore, deny them.

17 36. In response to paragraph 36 of the TAC, Defendants lack knowledge or
18 information sufficient to form a belief as to the truth of the allegations and,
19 therefore, deny them.

20 37. In response to the allegations in paragraph 37 of the TAC, the allegations
21 regarding whether Plaintiff Peterson can lawfully transfer a Fabrique Tactical
22 handgun to himself or others constitutes legal argument and/or conclusions that do
23 not require admission or denial. To the extent admission or denial is required,
24 Defendants deny those allegations. Defendants lack knowledge or information
25 sufficient to form a belief as to the truth of the remaining allegations and, therefore,
26 deny them.

27 38. In response to paragraph 38 of the TAC, Defendants deny that any
28 particular make or model of handgun is “constitutionally protected.” In response to

1 the remaining allegations, Defendants lack knowledge or information sufficient to
2 form a belief as to the truth of the allegations and, therefore, deny them.

3 39. In response to paragraph 39 of the TAC, Defendants lack knowledge or
4 information sufficient to form a belief as to the truth of the allegations and,
5 therefore, deny them.

6 40. In response to paragraph 40 of the TAC, Defendants lack knowledge or
7 information sufficient to form a belief as to the truth of the allegations and,
8 therefore, deny them.

9 41. In response to paragraph 41 of the TAC, Defendants deny that any
10 particular make or model of handgun is “constitutionally protected.” In response to
11 the remaining allegations, Defendants lack knowledge or information sufficient to
12 form a belief as to the truth of the allegations and, therefore, deny them.

13 42. In response to paragraph 42 of the TAC, Defendants deny that any
14 particular make or model of handgun is “constitutionally protected.” In response to
15 the remaining allegations, Defendants lack knowledge or information sufficient to
16 form a belief as to the truth of the allegations and, therefore, deny them.

17 43. In response to paragraph 43 of the TAC, Defendants lack knowledge or
18 information sufficient to form a belief as to the truth of the allegations and,
19 therefore, deny them.

20 44. In response to paragraph 44 of the TAC, Defendants lack knowledge or
21 information sufficient to form a belief as to the truth of the allegations and,
22 therefore, deny them.

23 45. In response to paragraph 45 of the TAC, Defendants deny that any
24 particular make or model of handgun is “constitutionally protected.” In response to
25 the remaining allegations, Defendants lack knowledge or information sufficient to
26 form a belief as to the truth of the allegations and, therefore, deny them.

27 46. In response to paragraph 46 of the TAC, Defendants deny that any
28 particular make or model of handgun is “constitutionally protected.” In response to

1 the remaining allegations, Defendants lack knowledge or information sufficient to
2 form a belief as to the truth of the allegations and, therefore, deny them.

3 47. In response to paragraph 47 of the TAC, Defendants lack knowledge or
4 information sufficient to form a belief as to the truth of the allegations and,
5 therefore, deny them.

6 48. In response to paragraph 48 of the TAC, Defendants lack knowledge or
7 information sufficient to form a belief as to the truth of the allegations and,
8 therefore, deny them.

9 49. In response to paragraph 49 of the TAC, Defendants deny that any
10 particular make or model of handgun is “constitutionally protected.” In response to
11 the remaining allegations, Defendants lack knowledge or information sufficient to
12 form a belief as to the truth of the allegations and, therefore, deny them.

13 50. In response to paragraph 50 of the TAC, Defendants deny that any
14 particular make or model of handgun is “constitutionally protected.” In response to
15 the remaining allegations, Defendants lack knowledge or information sufficient to
16 form a belief as to the truth of the allegations and, therefore, deny them.

17 51. In response to paragraph 51 of the TAC, Defendants deny that any
18 particular make or model of handgun is “constitutionally protected.” In response to
19 the remaining allegations, Defendants lack knowledge or information sufficient to
20 form a belief as to the truth of the allegations and, therefore, deny them.

21 52. In response to paragraph 52 of the TAC, Defendants deny that any
22 particular make or model of handgun is “constitutionally protected.” In response to
23 the remaining allegations, Defendants lack knowledge or information sufficient to
24 form a belief as to the truth of the allegations and, therefore, deny them.

25 53. In response to paragraph 53 of the TAC, Defendants deny that any
26 particular make or model of handgun is “constitutionally protected.” In response to
27 the remaining allegations, Defendants lack knowledge or information sufficient to
28 form a belief as to the truth of the allegations and, therefore, deny them.

1 54. In response to paragraph 54 of the TAC, Defendants deny that any
2 particular make or model of handgun is “constitutionally protected.” In response to
3 the remaining allegations, Defendants lack knowledge or information sufficient to
4 form a belief as to the truth of the allegations and, therefore, deny them.

5 55. In response to the allegations in paragraph 55, Defendants admit that Rob
6 Bonta is the Attorney General of the State of California and the head of the
7 California Department of Justice. With respect to any citation or quotation of a
8 legal authority, that authority speaks for itself. Defendants admit that the California
9 Department of Justice and the Bureau of Firearms enforce state law related to the
10 sales, transfer, possession, manufacture, and ownership of firearms. Defendants
11 admit that the California Attorney General and the California Department of Justice
12 maintain an office in San Diego, California. Defendants deny all remaining
13 allegations in paragraph 55.

14 56. In response to the allegations in paragraph 56, Defendants deny that
15 Blake Graham is the Director of the DOJ’s Bureau of Firearms. Allison Mendoza
16 is currently the Acting Director of the Bureau of Firearms. In that role, she reports
17 to Attorney General Bonta and oversees the operations of the Bureau of Firearms,
18 including the implementation and enforcement of state statutes, regulations, and
19 policies regarding firearm and ammunition sales, possession, and transfers.
20 Defendants admit that Allison Mendoza, having been substituted for former Acting
21 Director Blake Graham, is sued in her official capacity as Acting Director.
22 Defendants deny all remaining allegations.

23 **ANSWER TO ALLEGATIONS ON JURISDICTION AND VENUE**

24 57. Paragraph 57 of the TA consists of legal argument and/or conclusions
25 that do not require admission or denial. To the extent admission or denial is
26 required, Defendants admit that this court has jurisdiction over Plaintiffs’ claims
27 but deny all remaining allegations.
28

1 65. In response to paragraph 65 of the TAC, Defendants admit that the
2 California Department of Justice participates in the National Instant Criminal
3 Background Check System (NICS), in accordance with California Penal Code
4 section 28229, subdivision (b). With respect to any citation or quotation of a legal
5 authority, that authority speaks for itself. Defendants deny all remaining allegations
6 in paragraph 65.

7 66. Paragraph 66 of the TAC consists of a quotation of a legal authority.
8 That legal authority speaks for itself. To the extent admission or denial is required,
9 Defendants deny all allegations.

10 67. Defendants admit the allegations in paragraph 67 of the TAC.

11 68. In response to paragraph 68 of the TAC, Defendants admit that a COE
12 certificate holder is subject to “Rap Back” notifications which alert the Department
13 when the holder is arrested or otherwise prohibited from purchasing or possessing
14 firearms. Defendants deny the remaining allegations.

15 69. Defendants admit the allegations in paragraph 69 of the TAC.

16 70. In response to paragraph 70 of the TAC, Defendants admit that additional
17 information on the Roster of Certified Handguns (“Roster”) can be found in
18 California Code of Regulations, title 11, section 4070.

19 71. In response to paragraph 71 of the TAC, Defendants admit that the
20 Roster contains less than all of the handgun makes and models commercially
21 available throughout the United States. Defendants lack knowledge or information
22 sufficient to form a belief as whether the handgun makes and models on the Roster
23 constitute a “small fraction” of the handguns available elsewhere in the United
24 States and therefore denies that allegation. Defendants deny all remaining
25 allegations.

26 72. In response to the allegations in paragraph 72 of the TAC, Defendants
27 lack knowledge or information sufficient to form a belief as to the truth of the
28 allegations and, therefore, deny them.

1 73. In response to paragraph 73 of the TAC Defendants admit that as of
2 October 24, 2022, the Roster included 815 models of handguns. In response to the
3 remaining allegations Defendants lack knowledge or information sufficient to form
4 a belief as to their truth and, therefore, deny them.

5 74. In response to the allegations in paragraph 74 of the TAC, Defendants
6 admit that the Assembly Bill No. 2847 (2019-2020 Reg. Sess) (“AB 2847”) was
7 passed by the California Legislature and signed by the Governor and became
8 effective as of January 1, 2021. The provisions of AB 47 and California Penal
9 Code section 31910(b)(7) speak for themselves and do not require admission or
10 denial. To the extent admission or denial is required, Defendants deny the
11 remaining allegations.

12 75. In response to paragraph 75 of the TAC, Defendants lack knowledge or
13 information sufficient to form a belief as to the truth of the allegations and,
14 therefore, deny them.

15 76. Paragraph 76 of the TAC consists of legal argument and/or conclusions
16 that do not require admission or denial. To the extent admission or denial is
17 required, Defendants deny all allegations.

18 77. Paragraph 77 of the TAC consists of legal argument and/or conclusions
19 related to California Penal Code section 32015 and the Second Amendment that do
20 not require admission or denial. To the extent admission or denial is required,
21 Defendants deny all allegations. To the extent any allegations are factual rather than
22 legal, Defendants lack knowledge or information sufficient to form a belief as to the
23 truth of the allegations and, therefore, deny them.

24 78. In response to paragraph 78 of the TAC, Defendants admit that, as of
25 November 9, 2022, the Bureau of Firearm’s online list of de-certified handgun
26 models showed that hundreds of models have been decertified since December 31,
27 2001, and that 33 models have been de-certified in 2022. Defendants admit that in
28 October 2022, one model of handgun was added to the Roster. Defendants lack

1 knowledge or information sufficient to form a belief as to the truth of the remaining
2 allegations and, therefore, deny them.

3 79. Paragraph 79 of the TAC consists of legal argument and/or conclusions
4 that do not require admission or denial. To the extent admission or denial is
5 required, Defendants deny all allegations.

6 80. Paragraph 80 of the TAC consists of legal argument and/or conclusions
7 that do not require admission or denial. To the extent admission or denial is
8 required, Defendants deny all allegations.

9 81. Paragraph 81 of the TAC consists of legal argument and/or conclusions
10 that do not require admission or denial. To the extent admission or denial is
11 required, Defendants deny all allegations.

12 82. Paragraph 82 of the TAC consists of legal argument and/or conclusions
13 that do not require admission or denial. To the extent admission or denial is
14 required, Defendants deny all allegations.

15 83. Paragraph 83 of the TAC consists of legal argument and/or conclusions
16 that do not require admission or denial. To the extent admission or denial is
17 required, Defendants deny all allegations.

18 84. Paragraph 84 of the TAC consists of legal argument and/or conclusions
19 that do not require admission or denial. To the extent admission or denial is
20 required, Defendants deny all allegations. To the extent any allegations are factual
21 rather than legal, due to the ambiguity of the allegations Defendants lack
22 knowledge or information sufficient to form a belief as to the truth of the
23 allegations, they therefore deny them.

24 85. In response to the allegations in paragraph 85 of the TAC, Defendants
25 admit that the provisions of California's Unsafe Handgun Act are not, alone,
26 sufficient to guarantee that all handguns will be used in a safe manner. Defendants
27 deny all remaining allegations.

28

1 86. In response to the allegations in paragraph 86 of the TAC, Defendants
2 admit that the provisions of California’s Unsafe Handgun Act are not, alone,
3 sufficient to guarantee that all handguns will be used in a safe manner. Defendants
4 deny all remaining allegations.

5 87. Defendants deny the allegations in paragraph 87 of the TAC.

6 88. Defendants deny the allegations in paragraph 88 of the TAC.

7 89. In response to the allegations in paragraph 89 of the TAC, Defendants
8 lack knowledge or information sufficient to form a belief as to the truth of the
9 allegations and, therefore, deny them.

10 90. In response to the allegations in paragraph 90 of the TAC, Defendants
11 lack knowledge or information sufficient to form a belief as to the truth of the
12 allegations and, therefore, deny them.

13 91. In response to the allegations in paragraph 91 of the TAC, Defendants
14 lack knowledge or information sufficient to form a belief as to the truth of the
15 allegations and, therefore, deny them.

16 92. In response to the allegations in paragraph 92 of the TAC, Defendants
17 lack knowledge or information sufficient to form a belief as to the truth of the
18 allegations and, therefore, deny them.

19 93. In response to the allegations in paragraph 93 of the TAC, Defendants
20 lack knowledge or information sufficient to form a belief as to the truth of the
21 allegations and, therefore, deny them.

22 94. Paragraph 94 of the TAC, including footnote 6, consists of legal
23 argument and/or conclusions that do not require admission or denial. To the extent
24 admission or denial is required, Defendants deny all allegations.

25 95. Defendants admit the allegations in paragraph 95 of the TAC.

26 96. Defendants admit the allegations in paragraph 96 of the TAC.

27 97. Defendants admit the allegations in paragraph 97 of the TAC.

28

1 106. Paragraph 106 of the TAC consists of legal argument and/or conclusions
2 that do not require admission or denial. To the extent admission or denial is
3 required, Defendants deny all allegations.

4 107. Paragraph 107 of the TAC consists of legal argument and/or conclusions
5 that do not require admission or denial. To the extent admission or denial is
6 required, Defendants deny all allegations. With respect to any citation or quotation
7 of a legal authority, that authority speaks for itself.

8 108. Paragraph 108 of the TAC consists of legal argument and/or conclusions
9 that do not require admission or denial. To the extent admission or denial is
10 required, Defendants deny all allegations.

11 109. Paragraph 109 of the TAC consists of legal argument and/or conclusions
12 that do not require admission or denial. To the extent admission or denial is
13 required, Defendants deny all allegations.

14 110. Paragraph 110 of the TAC consists of legal argument and/or conclusions
15 that do not require admission or denial. To the extent admission or denial is
16 required, Defendants deny all allegations. With respect to any citation or quotation
17 of a legal authority, that authority speaks for itself.

18 111. Paragraph 111 of the TAC consists of legal argument and/or conclusions
19 that do not require admission or denial. To the extent admission or denial is
20 required, Defendants deny all allegations. With respect to any citation or quotation
21 of a legal authority, that authority speaks for itself.

22 112. In response to the allegations in paragraph 112 of the TAC, due to the
23 ambiguity of the allegations, Defendants lack knowledge or information sufficient
24 to form a belief as to the truth of the allegations and, therefore, deny them.

25 113. Paragraph 113 of the TAC consists of legal argument and/or conclusions
26 that do not require admission or denial. To the extent admission or denial is
27 required, Defendants deny all allegations. With respect to any citation or quotation
28 of a legal authority, that authority speaks for itself.

1 114. Paragraph 114 of the TAC consists of legal argument and/or conclusions
2 that do not require admission or denial. To the extent admission or denial is
3 required, Defendants deny all allegations. With respect to any citation or quotation
4 of a legal authority, that authority speaks for itself.

5 115. Paragraph 115 of the TAC consists of legal argument and/or conclusions
6 that do not require admission or denial. To the extent admission or denial is
7 required, Defendants deny all allegations.

8 116. Paragraph 116 of the TAC consists of a quotation of a legal authority.
9 That legal authority speaks for itself. To the extent admission or denial is required,
10 Defendants deny all allegations.

11 117. Paragraph 117 of the TAC consists of legal argument and/or conclusions
12 that do not require admission or denial. To the extent admission or denial is
13 required, Defendants deny all allegations.

14 118. Paragraph 118 of the TAC consists of legal argument and/or conclusions
15 that do not require admission or denial. To the extent admission or denial is
16 required, Defendants deny all allegations. With respect to any citation or quotation
17 of a legal authority, that authority speaks for itself.

18 119. Paragraph 119 of the TAC consists of legal argument and/or conclusions
19 that do not require admission or denial. To the extent admission or denial is
20 required, Defendants deny all allegations. With respect to any citation or quotation
21 of a legal authority, that authority speaks for itself.

22 120. Paragraph 120 of the TAC consists of legal argument and/or conclusions
23 that do not require admission or denial. To the extent admission or denial is
24 required, Defendants deny all allegations.

25 121. Paragraph 121 of the TAC consists of legal argument and/or conclusions
26 that do not require admission or denial. To the extent admission or denial is
27 required, Defendants deny all allegations. With respect to any citation or quotation
28 of a legal authority, that authority speaks for itself.

1 122. Paragraph 122 of the TAC consists of a quotation of a legal authority.
2 That legal authority speaks for itself. To the extent admission or denial is required,
3 Defendants deny all allegations.

4 123. Paragraph 123 of the TAC consists of legal argument and/or conclusions
5 that do not require admission or denial. To the extent admission or denial is
6 required, Defendants deny all allegations. With respect to any citation or quotation
7 of a legal authority, that authority speaks for itself.

8 124. Paragraph 124 of the TAC consists of legal argument and/or conclusions
9 that do not require admission or denial. To the extent admission or denial is
10 required, Defendants deny all allegations. With respect to any citation or quotation
11 of a legal authority, that authority speaks for itself.

12 125. Paragraph 125 of the TAC consists of legal argument and/or conclusions
13 that do not require admission or denial. To the extent admission or denial is
14 required, Defendants deny all allegations.

15 126. Paragraph 126 of the TAC consists of legal argument and/or conclusions
16 that do not require admission or denial. To the extent admission or denial is
17 required, Defendants deny all allegations. With respect to any citation or quotation
18 of a legal authority, that authority speaks for itself.

19 127. Paragraph 127 of the TAC consists of legal argument and/or conclusions
20 that do not require admission or denial. To the extent admission or denial is
21 required, Defendants deny all allegations. With respect to any citation or quotation
22 of a legal authority, that authority speaks for itself.

23 128. Paragraph 128 of the TAC consists of a quotation of a legal authority.
24 That legal authority speaks for itself. To the extent admission or denial is required,
25 Defendants deny all allegations.

26 129. Paragraph 129 of the TAC consists of legal argument and/or conclusions
27 that do not require admission or denial. To the extent admission or denial is
28 required, Defendants deny all allegations. To the extent paragraph 129 contains

1 any factual allegations, Defendants lack knowledge or information sufficient to
2 form a belief as to the truth of the allegations and, therefore, deny them.

3 130. Paragraph 130 of the TAC consists of legal argument and/or conclusions
4 that do not require admission or denial. To the extent admission or denial is
5 required, Defendants deny all allegations. To the extent paragraph 129 contains
6 any factual allegations, due to their ambiguity, Defendants lack knowledge or
7 information sufficient to form a belief as to the truth of the allegations and,
8 therefore, deny them.

9 131. Paragraph 131 of the TAC consists of legal argument and/or conclusions
10 that do not require admission or denial. To the extent admission or denial is
11 required, Defendants deny all allegations. With respect to any citation or quotation
12 of a legal authority, that authority speaks for itself.

13 132. Paragraph 132 of the TAC consists of legal argument and/or conclusions
14 that do not require admission or denial. To the extent admission or denial is
15 required, Defendants deny all allegations.

16 133. In response to paragraph 133 of the TAC, Defendants admit that they
17 generally enforce the provisions of California's Unsafe Handgun Act, as authorized
18 and required by law. As to the remaining allegations, due to their ambiguity,
19 Defendants lack knowledge or information sufficient to form a belief as to the truth
20 of the allegations and, therefore, deny them.

21 134. Paragraph 134 of the TAC consists of legal argument and/or conclusions
22 that do not require admission or denial. To the extent admission or denial is
23 required, Defendants deny all allegations. To the extent paragraph 129 contains
24 any factual allegations, Defendants lack knowledge or information sufficient to
25 form a belief as to the truth of the allegations and, therefore, deny them.

26 135. Paragraph 135 of the TAC consists of legal argument and/or conclusions
27 that do not require admission or denial. To the extent admission or denial is
28 required, Defendants deny all allegations. To the extent paragraph 129 contains

1 any factual allegations, Defendants lack knowledge or information sufficient to
2 form a belief as to the truth of the allegations and, therefore, deny them.

3 136. Paragraph 136 of the TAC consists of legal argument and/or conclusions
4 that do not require admission or denial. To the extent admission or denial is
5 required, Defendants deny all allegations.

6 137. Paragraph 137 of the TAC consists of legal argument and/or conclusions
7 that do not require admission or denial. To the extent admission or denial is
8 required, Defendants deny all allegations.

9 138. Paragraph 138 of the TAC consists of legal argument and/or conclusions
10 that do not require admission or denial. To the extent admission or denial is
11 required, Defendants deny all allegations.

12 139. Paragraph 139 of the TAC consists of legal argument and/or conclusions
13 that do not require admission or denial. To the extent admission or denial is
14 required, Defendants deny all allegations.

15 **ANSWER TO PRAYER FOR RELIEF**

16 No response is required to Plaintiffs' prayer for relief. To the extent
17 Defendants are required to respond, they deny that Plaintiffs are entitled to the
18 requested relief.

19 **DEFENSES**

20 In addition to the foregoing admissions and denials, and without admitting any
21 allegations contained in the TAC, Defendants assert the following defenses.

22 **FIRST DEFENSE**

23 The TAC, and each cause of action alleged therein, fails to state a claim on
24 which relief can be granted.

25 **RESERVATION OF DEFENSES**

26 The foregoing defenses are raised without waiver of any other defenses that
27 might become known during this litigation. Defendants hereby reserve their right to
28 amend or supplement their answer to assert any other related defenses.

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PRAYER OF DEFENDANTS

WHEREFORE, Defendants pray that:

1. The TAC, and all claims and prayers for relief therein, be denied in their entirety;
2. Plaintiffs take nothing from Defendants by this action;
3. Defendants be awarded their costs incurred in defending this action;
4. Defendants be awarded such further relief that the Court may deem just and proper.

Dated: November 14, 2022

Respectfully submitted,

ROB BONTA
Attorney General of California
ANTHONY R. HAKL
Supervising Deputy Attorney General

/s/ Gabrielle D. Boutin
GABRIELLE D. BOUTIN
Deputy Attorney General
Attorneys for Defendants Attorney General Rob Bonta and Acting Director Allison Mendoza, in their official capacities

CERTIFICATE OF SERVICE

Case Name: **Lana Rae Renna et al. v. Rob Bonta, et al.** No. **3:20-cv-02190-DMS-DEB**

I hereby certify that on November 14, 2022, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

ANSWER TO THIRD AMENDED COMPLAINT

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on November 14, 2022, at Sacramento, California.

Ritta Mashriqi
Declarant

/s/Ritta Mashriqi
Signature

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36714992.docx

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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

Lana Rae Renna; Danielle Jaymes;
Laura Schwartz; Michael Schwartz;
John Klier; Justin Smith; John Phillips;
Cheryl Prince; Darin Prince; Ryan
Peterson; PWGG, L.P.; North County
Shooting Center, Inc.; Gunfighter
Tactical, LLC; Firearms Policy
Coalition, Inc.; San Diego County Gun
Owners PAC; Citizens Committee for
the Right to Keep and Bear Arms; and
Second Amendment Foundation,
Plaintiffs,

vs.

Robert Bonta, Attorney General of
California; and Blake Graham,¹
Director of the California Department
of Justice Bureau of Firearms,
Defendants.

Case No.: 20-cv-2190-DMS-DEB

**THIRD AMENDED COMPLAINT
FOR DECLARATORY AND
INJUNCTIVE RELIEF**

¹ Blake Graham is substituted for Luis Lopez. *See* Fed. R. Civ. P. 25(d).

1 Plaintiffs Lana Rae Renna, Danielle Jaymes, Laura Schwartz, Michael
2 Schwartz, John Klier, Justin Smith, John Phillips, Cheryl Prince, Darin Prince, and
3 Ryan Peterson (collectively the “Individual Plaintiffs”), PWGG, L.P., North County
4 Shooting Center, Inc., and Gunfighter Tactical, LLC, (collectively, the “Retailer
5 Plaintiffs”), Firearms Policy Coalition, Inc., San Diego County Gun Owners PAC,
6 Citizens Committee for the Right to Keep and Bear Arms, and Second Amendment
7 Foundation (collectively the “Institutional Plaintiffs”) (altogether collectively
8 “Plaintiffs”), by and through counsel of record, bring this complaint for injunctive
9 and declaratory relief against Individual Defendants California Attorney General
10 Robert Bonta and California Department of Justice Bureau of Firearms Director
11 Blake Graham (collectively “Defendants”), and allege as follows:

12 **INTRODUCTION**

13 1. The Second Amendment to the United States Constitution guarantees
14 “the right of the people to keep and bear Arms.” U.S. CONST. AMEND. II. Plaintiffs,
15 and all similarly situated members of Institutional Plaintiffs, who are all eligible to
16 exercise their Second Amendment rights, wish to keep and bear constitutionally
17 protected arms for self-defense and other lawful purposes.

18 2. But because of Defendants’ enforcement of the laws, regulations,
19 policies, practices, and customs underlying the State of California’s ban on the
20 purchase (Cal. Penal Code §§ 31900, *et seq.* and 32000, *et seq.*)² of common and
21 constitutionally protected handguns that the State deems presumptively “unsafe” and
22 thus illegal for commercial sale under its “roster” of “Handguns Certified for Sale”
23 (“Handgun Roster”), Plaintiffs, and all similarly situated members of Institutional
24 Plaintiffs, cannot purchase new constitutionally protected arms without suffering
25 criminal liability (the “Handgun Ban”), in violation of the Second and Fourteenth
26

27 ² All Penal Code references are to the California Penal Code except where otherwise
28 indicated.

1 Amendments to the United States Constitution.

2 3. In *N.Y. State Rifle & Pistol Ass’n v. Bruen*, 142 S. Ct. 2111, the United
3 States Supreme Court expressly rejected all interest balancing and the Ninth
4 Circuit’s prior “two-step” approach in the context of Second Amendment claims.

5 4. Indeed, “*Heller* and *McDonald* do not support applying means-end
6 scrutiny in the Second Amendment context. Instead, the government must
7 affirmatively prove that its firearms regulation is part of the historical tradition that
8 delimits the outer bounds of the right to keep and bear arms.” 142 S. Ct. at 2127.
9 Ultimately, “*Heller* ... demands a test rooted in the Second Amendment’s text, as
10 informed by history.” *Id.*

11 5. *Bruen* did not create a new test but instead applied the very test the
12 Court established in *Heller* in 2008. “The test that we set forth in *Heller* and apply
13 today requires courts to assess whether modern firearms regulations are consistent
14 with the Second Amendment’s text and historical understanding.” *Id.*, at 2131.

15 6. “*Heller*’s methodology centered on constitutional text and history.
16 Whether it came to defining the character of the right (individual or militia
17 dependent), suggesting the outer limits of the right, or assessing the constitutionality
18 of a particular regulation, *Heller* relied on text and history. It did not invoke any
19 means-end test such as strict or intermediate scrutiny.” *Id.* at 2128-29.

20 7. The plain text of the Second Amendment covers the conduct Plaintiffs,
21 and all similarly situated members of Institutional Plaintiffs, wish to engage in
22 (“keep and bear arms”) and the arms they wish to keep and bear. *Id.* at 2132 (“the
23 Second Amendment extends, prima facie, to all instruments that constitute bearable
24 arms”).

25 8. Since the conduct is covered by the Second Amendment’s plain text,
26 the government must justify its regulations as consistent with this Nation’s tradition
27 of firearm regulation.

28 9. “When the Second Amendment’s plain text covers an individual’s

1 conduct, the Constitution presumptively protects that conduct. To justify its
2 regulation, the government . . . must demonstrate that the regulation is consistent
3 with this Nation’s tradition of firearm regulation.” *Bruen*, 142 S. Ct. at 2126.

4 10. *Heller* has already established the relevant contours of the tradition:
5 Bearable arms that are presumptively protected by the Second Amendment cannot
6 be banned unless they are both dangerous *and* unusual. *District of Columbia v.*
7 *Heller*, 554 U.S. 570, 627 (2008).

8 11. And the Second Amendment’s “reference to ‘arms’ does not apply
9 ‘only [to] those arms in existence in the 18th century.’ ” *Bruen*, 142 S. Ct. at 2132
10 (quoting *Heller*, 554 U.S. at 582). “Just as the First Amendment protects modern
11 forms of communications, and the Fourth Amendment applies to modern forms of
12 search, the Second Amendment extends, *prima facie*, to all instruments that
13 constitute bearable arms, even those that were not in existence at the time of the
14 founding.” *Id.* (citations omitted).

15 12. “Semiautomatic weapons,” such as those proscribed under the Handgun
16 Ban, “traditionally have been widely accepted as lawful possessions.” *Staples v.*
17 *United States*, 511 U.S. 600, 612 (1994)).

18 13. And “[w]hatever the likelihood that handguns were considered
19 dangerous and unusual during the colonial period, they are indisputably in common
20 use for self-defense today. They are, in fact, the quintessential self-defense weapon.”
21 *Bruen*, 142 S. Ct. at 2143 (quoting *Heller*, 554 U.S. at 629) (cleaned up).

22 14. “Thus, even though the Second Amendment’s definition of ‘arms’ is
23 fixed according to its historical understanding, that general definition covers modern
24 instruments that facilitate armed self-defense.” *Id.* (citing *Caetano v. Massachusetts*,
25 577 U.S. 411, 411-412 (2016) (*per curiam*), concerning stun guns).

26 15. In *Bruen*, the Supreme Court made clear that the Ninth Circuit’s former
27 two-step approach and interest-balancing applied in *Peña v. Lindley*, 898 F.3d 969
28 (9th Cir. 2018), which previously upheld a prior version of some of the laws

1 innovative M&P380 Shield EZ pistol is the latest addition to the M&P M2.0 family
2 and provides an easy-to-use protection option for both first-time shooters and
3 experienced handgunners alike.” The Smith & Wesson M&P® 380 SHIELD™ EZ®
4 that Plaintiff Renna wishes to purchase is a constitutionally protected handgun that
5 is in common use for self-defense and other lawful purposes and widely sold and
6 possessed outside of California.

7 19. But for the Handgun Ban and Defendants’ active enforcement thereof,
8 Plaintiff Renna would, for self-defense and other lawful purposes, purchase new
9 from a licensed retailer a constitutionally protected handgun not currently on or
10 eligible under the Handgun Ban to be added to Defendants’ Handgun Roster,
11 including but not limited to a Smith & Wesson M&P® 380 SHIELD™ EZ®.

12 ***Plaintiff Jaymes***

13 20. Plaintiff Danielle Jaymes is a natural person and a citizen of the State
14 of California, residing in San Diego County, California. Plaintiff Jaymes is not
15 disqualified from exercising Second Amendment rights nor prohibited under state or
16 federal law from possessing, receiving, owning, or purchasing a firearm. Plaintiff
17 Jaymes possesses a valid COE issued by the Defendants’ Department of Justice
18 Bureau of Firearms. Plaintiff Jaymes is a member and supporter of Plaintiffs FPC,
19 SDCGO, CCRKBA, and SAF.

20 21. But for the Handgun Ban and Defendants’ active enforcement thereof,
21 Plaintiff Jaymes would, for self-defense and other lawful purposes, purchase new
22 from a licensed retailer a constitutionally protected handgun not currently on or
23 eligible under the Handgun Ban to be added to Defendants’ Handgun Roster,
24 including but not limited to a Sig 365, G43X, Glock 19 Gen5, Sig P320, and/or
25 Nighthawk Lady Hawk, which is a constitutionally protected handgun in common
26 use for self-defense and lawful purposes.

27 ***Plaintiff L. Schwartz***

28 22. Plaintiff Laura Schwartz (“L. Schwartz”) is a natural person and a

1 citizen of the State of California, residing in San Diego County, California. Plaintiff
2 L. Schwartz is not disqualified from exercising Second Amendment rights nor
3 prohibited under state or federal law from possessing, receiving, owning, or
4 purchasing a firearm. Plaintiff L. Schwartz holds an active license to carry a
5 concealed weapon (“CCW”) issued by her county sheriff, after proving “good cause”
6 and “good moral character” to her licensing authority, successfully completing a
7 course of training on the law and firearms proficiency under California Penal Code
8 section 26165, and passing an extensive Live Scan-based background check and
9 placement into the State’s system for monitoring law enforcement contact, arrests,
10 and criminal convictions (“Rap Back”). Plaintiff L. Schwartz is a member and
11 supporter of Plaintiffs FPC, SDCGO, CCRKBA, and SAF.

12 23. But for the Handgun Ban and Defendants’ active enforcement thereof,
13 Plaintiff L. Schwartz would, for self-defense and other lawful purposes, purchase
14 new from a licensed retailer a constitutionally protected handgun not currently on or
15 eligible under the Handgun Ban to be added to Defendants’ Handgun Roster,
16 including but not limited to a Glock 19 Gen5 and/or Springfield Armory Hellcat,
17 which are constitutionally protected handguns in common use for self-defense and
18 lawful purposes.

19 ***Plaintiff M. Schwartz***

20 24. Plaintiff Michael Schwartz (“M. Schwartz”) is a natural person and a
21 citizen of the State of California, residing in San Diego County, California. Plaintiff
22 M. Schwartz is not disqualified from exercising Second Amendment rights nor
23 prohibited under state or federal law from possessing, receiving, owning, or
24 purchasing a firearm. Plaintiff M. Schwartz holds an active license to carry a
25 concealed weapon (“CCW”) issued by his county sheriff, after proving “good cause”
26 and “good moral character” to his licensing authority, successfully completing a
27 course of training on the law and firearms proficiency under California Penal Code
28 section 26165 and passing an extensive Live Scan-based background check and

1 placement into the State’s system for monitoring law enforcement contact, arrests,
2 and criminal convictions (“Rap Back”). Plaintiff M. Schwartz is the Executive
3 Director of Plaintiff San Diego County Gun Owners PAC. Plaintiff M. Schwartz is
4 a member and supporter of Plaintiffs FPC, SDCGO, CCRKBA, and SAF.

5 25. But for the Handgun Ban and Defendants’ active enforcement thereof,
6 Plaintiff M. Schwartz would, for self-defense and other lawful purposes, purchase
7 new from a licensed retailer a constitutionally protected handgun not currently on or
8 eligible under the Handgun Ban to be added to Defendants’ Handgun Roster,
9 including but not limited to a Glock 19 Gen5 and/or Springfield Armory Hellcat,
10 which are constitutionally protected handguns in common use for self-defense and
11 other lawful purposes.

12 ***Plaintiff Klier***

13 26. Plaintiff John Klier is a natural person and a citizen of the State of
14 California, residing in San Diego County, California. Plaintiff Klier is not
15 disqualified from exercising Second Amendment rights nor prohibited under state or
16 federal law from possessing, receiving, owning, or purchasing a firearm. Plaintiff
17 Klier is a veteran of the Navy, having been disabled and honorably discharged after
18 serving in Iraq as a “Seabee” member of the United States Naval Construction
19 Battalions. Plaintiff Klier is a trained firearms instructor who owns and operates
20 Active Shooter Defense School (“ASDS”), which “employs the best instructors in
21 the industry,” with “former [Navy] SEALs, Rangers, engineers, SWAT officers,
22 combatives instructors and current top performing competitive shooters on staff to
23 ensure students master each technique being taught.” ASDS’s “mission is to provide
24 the most up to date tactical weapons training available to the public, law enforcement
25 and military.”³ Plaintiff Klier is a member and supporter of Plaintiffs FPC, SDCGO,
26

27 ³ See “Meet our Team” on ASDS’s website, online at [https://asdschool.com/asds-](https://asdschool.com/asds-instructors)
28 instructors.

1 CCRKBA, and SAF.

2 27. But for Handgun Ban and Defendants' active enforcement thereof,
3 Plaintiff Klier would, for self-defense and other lawful purposes, purchase new from
4 a licensed retailer a constitutionally protected handgun not currently on or eligible
5 under Handgun Ban to be added to Defendants' Handgun Roster, including but not
6 limited to a Glock 19 Gen5, which is a constitutionally protected handgun in
7 common use for self-defense and other lawful purposes.

8 ***Plaintiff Smith***

9 28. Plaintiff Justin Smith is a natural person and a citizen of the State of
10 California, residing in San Diego County, California. Plaintiff Justin Smith is not
11 disqualified from exercising Second Amendment rights nor prohibited under state or
12 federal law from possessing, receiving, owning, or purchasing a firearm. Plaintiff
13 Smith is a member and supporter of Plaintiffs FPC, SDCGO, CCRKBA, and SAF.

14 29. But for the Handgun Ban and Defendants' active enforcement thereof,
15 Plaintiff Smith would, for self-defense and other lawful purposes, purchase new
16 from a licensed retailer a constitutionally protected handgun not currently on or
17 eligible under the Handgun Ban to be added to Defendants' Handgun Roster,
18 including but not limited to a CZ P10, Walther Q5 SF, and/or Glock 19 Gen4 and/or
19 Gen5, which are constitutionally protected handguns in common use for self-defense
20 and other lawful purposes.

21 ***Plaintiff Phillips***

22 30. Plaintiff John Phillips is a natural person and a citizen of the State of
23 California, residing in San Diego County, California. Plaintiff Phillips is not
24 disqualified from exercising Second Amendment rights nor prohibited under state or
25 federal law from possessing, receiving, owning, or purchasing a firearm. Plaintiff
26 Phillips possesses a current COE issued by the Defendants' Department of Justice
27 Bureau of Firearms. Plaintiff Phillips is the President of Plaintiff PWG, a proprietor
28 of the business, and the individual licensee associated with the dealership and range

1 facility, including by and through Defendants and their Bureau of Firearms. Plaintiff
2 Phillips holds an active license to carry a concealed weapon (“CCW”) issued by his
3 county sheriff, after proving “good cause” and “good moral character” to his
4 licensing authority, successfully completing a course of training on the law and
5 firearms proficiency under Penal Code section 26165, and passing an extensive Live
6 Scan-based background check and placement into the State’s system for monitoring
7 law enforcement contact, arrests, and criminal convictions (“Rap Back”). Plaintiff
8 Phillips is a trained firearms instructor. Plaintiff Phillips is a member and supporter
9 of Plaintiffs FPC, SDCGO, CCRKBA, and SAF.

10 31. But for the Handgun Ban and Defendants’ active enforcement thereof,
11 Plaintiff Phillips would, for self-defense and other lawful purposes, purchase new
12 from a licensed retailer a constitutionally protected handgun not currently on or
13 eligible under the Handgun Ban to be added to Defendants’ Handgun Roster,
14 including but not limited to a Sig Sauer P365, Sig Sauer P320 M17, Glock 17 Gen5
15 MOS, Fabrique National Herstal 509, and/or Fabrique National Herstal FNX-9,
16 which are constitutionally protected handguns in common use for self-defense and
17 other lawful purposes.

18 ***Plaintiff C. Prince***

19 32. Plaintiff Cheryl Prince (“C. Prince”) is a natural person and a citizen of
20 the State of California, residing in San Diego County, California. Plaintiff C. Prince
21 is not disqualified from exercising Second Amendment rights nor prohibited under
22 state or federal law from possessing, receiving, owning, or purchasing a firearm.
23 Plaintiff C. Prince holds an active license to carry a concealed weapon (“CCW”) issued by her county sheriff, after proving “good cause” and “good moral character”
24 to her licensing authority, successfully completing a course of training on the law
25 and firearms proficiency under Penal Code section 26165, and passing an extensive
26 Live Scan-based background check and placement into the State’s system for
27 monitoring law enforcement contact, arrests, and criminal convictions (“Rap Back”).
28

1 Plaintiff C. Prince is a member and supporter of Plaintiffs FPC, SDCGO, CCRKBA,
2 and SAF.

3 33. But for the Handgun Ban and Defendants' active enforcement thereof,
4 Plaintiff C. Prince would, for self-defense and other lawful purposes, purchase new
5 from a licensed retailer a constitutionally protected handgun not currently on or
6 eligible under the Handgun Ban to be added to Defendants' Handgun Roster,
7 including but not limited to a Sig Sauer P365, which is a constitutionally protected
8 handgun in common use for self-defense and other lawful purposes.

9 ***Plaintiff D. Prince***

10 34. Plaintiff Darin Prince ("D. Prince") is a natural person and a citizen of
11 the State of California, residing in San Diego County, California. Plaintiff D. Prince
12 is not disqualified from exercising Second Amendment rights nor prohibited under
13 state or federal law from possessing, receiving, owning, or purchasing a firearm.
14 Plaintiff D. Prince possesses a current COE issued by the Defendants' Department
15 of Justice Bureau of Firearms. Plaintiff D. Prince is an owner and manager of
16 Plaintiff NCSC, the proprietor of the business, and the individual licensee associated
17 with the dealership, including by and through the Defendants and their Bureau of
18 Firearms. Plaintiff D. Prince holds an active license to carry a CCW issued by his
19 county sheriff under Penal Code section 26150, *et seq.*, after proving "good cause"
20 and "good moral character" to that licensing authority, successfully completing a
21 course of training on the law and firearms proficiency under section 26165, passing
22 an extensive Live Scan-based Department of Justice background check, and
23 placement into the "Rap Back" system for monitoring law enforcement contact,
24 arrests, and criminal convictions. Plaintiff D. Prince is a member of Plaintiffs FPC,
25 SDCGO, CCRKBA, and SAF.

26 35. But for the Handgun Ban and Defendants' active enforcement thereof,
27 Plaintiff D. Prince would, for self-defense and other lawful purposes, purchase new
28 from a licensed retailer a constitutionally protected handgun not currently on or

1 eligible under the Handgun Ban to be added to Defendants' Handgun Roster,
2 including but not limited to a Sig Sauer P320 AXG Scorpion, which is a
3 constitutionally protected handgun in common use for self-defense and other lawful
4 purposes.

5 ***Plaintiff Peterson***

6 36. Plaintiff Ryan Peterson is a natural person and a citizen of the State of
7 California, residing in San Diego County, California. Plaintiff Peterson is not
8 disqualified from exercising Second Amendment rights nor prohibited under state or
9 federal law from possessing, receiving, owning, or purchasing a firearm. Plaintiff
10 Peterson possesses a current COE issued by the Defendants' Department of Justice
11 Bureau of Firearms. Plaintiff Peterson is the proprietor of and an individual licensee
12 associated with Plaintiff Gunfighter Tactical. Plaintiff Peterson is a DOJ Certified
13 Instructor. Plaintiff Peterson is a member and supporter of Plaintiffs FPC, SDCGO,
14 CCRKBA, and SAF.

15 37. Ironically, Plaintiff Peterson, who owns and operates a gun store
16 (Plaintiff Gunfighter Tactical), is highly trained in the safe handling of firearms, is a
17 DOJ Certified Instructor, sells handguns not on the Defendants' Roster to those who
18 can lawfully purchase them (which excludes Individual Plaintiffs), and keeps for
19 lawful purposes including self-defense a Fabrique Nationale 509 Tactical handgun
20 while physically inside Gunfighter Tactical. However, he cannot lawfully transfer
21 that same firearm to himself—or to any other law-abiding citizen not exempt from
22 the Handgun Ban—even for self-defense in the home.

23 38. But for the Handgun Ban and Defendants' active enforcement thereof,
24 Plaintiff Peterson would, for self-defense and other lawful purposes, purchase new
25 from a licensed retailer a constitutionally protected handgun not currently on or
26 eligible under the Handgun Ban to be added to Defendants' Handgun Roster,
27 including but not limited to a Fabrique National Herstal 509 Tactical, Sig Sauer P220
28 Legion (10mm), Staccato 2011, Glock 19 Gen5, Glock 17 Gen5 MOS, and Wilson

1 Combat Elite CQB 1911 (9mm), which are constitutionally protected handguns in
2 common use for self-defense and other lawful purposes.

3 **Retailer Plaintiffs**

4 ***Plaintiff PWG***

5 39. Plaintiff PWGG, L.P. (“PWG”), a California limited partnership doing
6 business as “Poway Weapons & Gear” and “PWG Range,” is a licensed firearms
7 retailer, shooting range, and training facility in the City of Poway, within San Diego
8 County, California. Plaintiff PWG is a member and supporter of Plaintiffs FPC,
9 SDCGO, CCRKBA, and SAF.

10 40. Plaintiffs Phillips and PWG are a firearms dealer in Defendants’
11 Department of Justice Centralized List of Firearms Dealers, and are federally
12 licensed by the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) as
13 a Federal Firearms Licensee (“FFL”).

14 41. Many customers and prospective customers of Plaintiffs Phillips and
15 PWG are interested in, have, and continue to seek to purchase for self-defense and
16 other lawful purposes constitutionally protected handguns not currently on or
17 eligible under the Handgun Ban to be added to Defendants’ Handgun Roster.

18 42. But for the Handgun Ban and Defendants’ active enforcement thereof,
19 Plaintiffs Phillips and PWG would make available for sale to their adult customers
20 all of the constitutionally protected new handguns on the market that are available
21 outside of California but not currently on or eligible under the Handgun Ban to be
22 added to Defendants’ Handgun Roster, and sell and transfer them to their adult
23 customers who are not disqualified from exercising Second Amendment rights.

24 ***Plaintiff NCSC***

25 43. Plaintiff North County Shooting Center, Inc. (“NCSC”), a California
26 corporation, is a licensed firearms retailer, shooting range, and training facility in the
27 City of San Marcos, within San Diego County, California. Plaintiff NCSC is a
28 federally and state-licensed firearms retailer in San Marcos, California. Plaintiff

1 NCSC is a member of Plaintiffs FPC, SDCGO, CCRKBA, and SAF.

2 44. Plaintiffs D. Prince and NCSC are a firearms dealer in Defendants'
3 Department of Justice Centralized List of Firearms Dealers, and are federally
4 licensed by the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) as
5 a Federal Firearms Licensee (“FFL”).

6 45. Many customers and prospective customers of Plaintiffs D. Prince and
7 NCSC are interested in, have, and continue to seek to purchase for self-defense and
8 other lawful purposes constitutionally protected handguns not currently on or
9 eligible under the Handgun Ban to be added to Defendants’ Handgun Roster.

10 46. But for the Handgun Ban and Defendants’ active enforcement thereof,
11 Plaintiffs D. Prince and NCSC would make available for sale to their adult customers
12 all of the constitutionally protected new handguns on the market that are available
13 outside of California but not currently on or eligible under the Handgun Ban to be
14 added to Defendants’ Handgun Roster, and sell and transfer them to their adult
15 customers who are not disqualified from exercising Second Amendment rights.

16 ***Plaintiff Gunfighter Tactical***

17 47. Plaintiff Gunfighter Tactical, LLC (“Gunfighter Tactical”), a California
18 limited liability corporation doing business as “Gunfighter Tactical,” is a licensed
19 firearms retailer in the City of San Diego within San Diego County, California.
20 Plaintiff Gunfighter Tactical is a member of Plaintiffs FPC, SDCGO, CCRKBA, and
21 SAF.

22 48. Plaintiffs Peterson and Gunfighter Tactical are a firearms dealer in
23 Defendants’ Department of Justice Centralized List of Firearms Dealers, and are
24 federally licensed by the Bureau of Alcohol, Tobacco, Firearms, and Explosives
25 (“ATF”) as a Federal Firearms Licensee (“FFL”).

26 49. Many customers and prospective customers of Plaintiffs Peterson and
27 Gunfighter Tactical are interested in, have, and continue to seek to purchase for self-
28 defense and other lawful purposes constitutionally protected handguns not currently

1 on or eligible under the Handgun Ban to be added to Defendants' Handgun Roster.

2 50. But for the Handgun Ban and Defendants' active enforcement thereof,
3 Plaintiffs Peterson and Gunfighter Tactical would make available for sale to their
4 adult customers all of the constitutionally protected new handguns on the market that
5 are available outside of California but not currently on or eligible under the Handgun
6 Ban to be added to Defendants' Handgun Roster, and sell and transfer them to their
7 adult customers who are not disqualified from exercising Second Amendment rights.

8 **Institutional Plaintiffs**

9 ***Plaintiff FPC***

10 51. Plaintiff Firearms Policy Coalition, Inc. ("FPC") is a nonprofit
11 organization incorporated under the laws of Delaware with a place of business in
12 Clark County, Nevada. The purposes of FPC include defending and promoting the
13 People's rights, especially First and Second Amendment rights, advancing
14 individual liberty, and restoring freedom. FPC serves its members and the public
15 through legislative advocacy, grassroots advocacy, litigation and legal efforts,
16 research, education, outreach, and other programs. FPC has members in the State of
17 California, including Individual Plaintiffs who desire to purchase new
18 constitutionally protected arms for self-defense or other lawful purposes which are
19 not currently on or eligible under the Handgun Ban to be added to Defendants'
20 Handgun Roster, and Retailer Plaintiffs who desire to sell the same to their eligible
21 law-abiding customers. These members would each undertake the desired and
22 protected activity but for the criminal liability that they face under the laws,
23 regulations, policies, practices, and customs being challenged in this action. The
24 interests that FPC seeks to protect in this lawsuit are germane to the organization's
25 purposes.

26 ***Plaintiff SDCGO***

27 52. Plaintiff San Diego County Gun Owners PAC ("SDCGO") is a local
28 political organization whose purpose is to protect and advance the Second

1 Amendment rights of residents of San Diego County, California, through their
2 efforts to support and elect local and state representatives who support the Second
3 Amendment right to keep and bear arms. SDCGO's membership and donors consist
4 of Second Amendment supporters, people who own guns for self-defense and sport,
5 firearms dealers, shooting ranges, and elected officials who want to restore and
6 protect the right to keep and bear arms in California. SDCGO's members include
7 Individual Plaintiffs who desire to purchase new constitutionally protected arms for
8 self-defense or other lawful purposes which are not currently on or eligible under the
9 Handgun Ban to be added to Defendants' Handgun Roster, and Retailer Plaintiffs
10 who desire to sell the same to their eligible law-abiding customers. These members
11 would each undertake the desired and protected activity but for the criminal liability
12 that they face under the laws, regulations, policies, practices, and customs being
13 challenged in this action. The interests that SDCGO seeks to protect in this lawsuit
14 are germane to the organization's purposes.

15 ***Plaintiff CCRKBA***

16 53. Plaintiff Citizens Committee for the Right to Keep and Bear Arms
17 ("CCRKBA") is a nonprofit organization incorporated under the laws of Washington
18 with its principal place of business in Bellevue, Washington. CCRKBA is dedicated
19 to promoting the benefits of the right to bear arms. CCRKBA has members and
20 supporters nationwide, including thousands of members in California and in the
21 County of San Diego, California. CCRKBA's members include Individual Plaintiffs
22 who desire to purchase new constitutionally protected arms for self-defense or other
23 lawful purposes which are not currently on or eligible under the Handgun Ban to be
24 added to Defendants' Handgun Roster and Retailer Plaintiffs who desire to sell the
25 same to their eligible law-abiding customers. These members would each undertake
26 the desired and protected activity but for the criminal liability that they face under
27 the laws, regulations, policies, practices, and customs being challenged in this action.
28 The interests that CCRKBA seeks to protect in this lawsuit are germane to the

1 organization's purposes.

2 ***Plaintiff SAF***

3 54. Plaintiff Second Amendment Foundation ("SAF") is a nonprofit
4 educational foundation incorporated under the laws of Washington with its principal
5 place of business in Bellevue, Washington. SAF seeks to preserve the effectiveness
6 of the Second Amendment through education, research, publishing, and legal action
7 programs focused on the Constitutional right to possess firearms, and the
8 consequences of gun control. SAF has over 650,000 members and supporters
9 nationwide, including thousands of members in California and in the County of San
10 Diego, California. SAF's members include Individual Plaintiffs who desire to
11 purchase new constitutionally protected arms for self-defense or other lawful
12 purposes which are not currently on or eligible under the Handgun Ban to be added
13 to Defendants' Handgun Roster, and Retailer Plaintiffs who desire to sell the same
14 to their eligible law-abiding customers. These members would each undertake the
15 desired and protected activity but for the criminal liability that they face under the
16 laws, regulations, policies, practices, and customs being challenged in this action.
17 The interests that SAF seeks to protect in this lawsuit are germane to the
18 organization's purposes.

19

Defendants

20 ***Defendant Bonta***

21 55. Defendant Robert Bonta is the Attorney General of the State of
22 California, and is sued herein in his official capacity. Under Article 5, § 13 of the
23 California Constitution, Attorney General Bonta is the "chief law officer of the
24 State," with a duty "to see that the laws of the state are uniformly and adequately
25 enforced." Defendant Bonta is the head of the California Department of Justice
26 ("DOJ"). Defendant Bonta's DOJ and its Bureau of Firearms regulate and enforce
27 state law related to the sales, transfer, possession and ownership of firearms. The
28 Attorney General and DOJ maintain an office in San Diego, California.

1 ***Defendant Graham***

2 56. Defendant Blake Graham is the Director of the DOJ's Bureau of
3 Firearms. On information and belief, Defendant Graham reports to Attorney General
4 Bonta, and he is responsible for the various operations of the Bureau of Firearms,
5 including the implementation and enforcement of the statutes, regulations, and
6 policies regarding firearm and ammunition sales, possession, and transfers.
7 Defendant Graham is sued in his official capacity.

8 **JURISDICTION AND VENUE**

9 57. This Court has jurisdiction over all claims for relief pursuant to 28
10 U.S.C. §§ 1331, 1343, 2201, and 2202, and 42 U.S.C. §§ 1983 and 1988, as this
11 action seeks to redress the deprivation under color of the laws, statutes, ordinances,
12 regulations, customs, and usages of the State of California, of the rights, privileges,
13 or immunities secured by the United States Constitution.

14 58. Venue lies in this Court under 28 U.S.C. § 1391, as the events giving
15 rise to Plaintiffs' causes of action arose or exist in this District in which the action is
16 brought. Further, the venue rules of this State specifically would permit this action
17 to be filed in San Diego, since the Attorney General and California Department of
18 Justice maintain an office within this District; Cal. Code of Civ. Pro. § 401(1).

19 **STATEMENT OF FACTS**

20 **I. California's Ban on Handguns**

21 59. The Handgun Ban and Defendants' regulations, policies, and practices
22 enforcing the same, individually and collectively prevent Plaintiffs, and all similarly
23 situated members of Institutional Plaintiffs, who are not prohibited from possessing
24 or acquiring firearms, from purchasing handguns that are categorically in common
25 use for self-defense and other lawful purposes, and thus violate the Second and
26 Fourteenth Amendments to the United States Constitution.

27 **A. The General Regulatory Scheme**

28 60. In California, individuals are required to purchase and transfer firearms

1 and ammunition through state and federally licensed dealers, like Retailer Plaintiffs,
2 in face-to-face transactions, or face serious criminal penalties.

3 61. Because of an onerous regulatory scheme, which is designed to deny,
4 chill, suppress, and/or burden the exercise of fundamental, individual rights, people
5 in California cannot exercise their Second Amendment right to keep and bear arms
6 without going in person to retailers that must comply with the State’s regulatory
7 scheme on pain of criminal liability—a misdemeanor at a minimum, Pen. Code, §
8 19.4 (providing that, unless otherwise specified, a violation of a criminal statute
9 constitutes a misdemeanor)—as well as loss of the necessary licenses to engage in
10 any lawful firearm-related business.

11 62. “Where neither party to [a] [firearm] transaction holds a dealer’s license
12 issued pursuant to Sections 26700 to 26915, inclusive, the parties to the transaction
13 shall complete the sale, loan, or transfer of that firearm through a licensed firearms
14 dealer pursuant to Chapter 5 (commencing with Section 28050).” Pen. Code §
15 27545.

16 63. A license to transact in firearms “is subject to forfeiture for a breach of
17 any of the prohibitions and requirements of [Article 2, Penal Code §§ 26800 –
18 26915]” (with some exceptions that do not apply in the instant matter). Pen. Code §
19 26800.

20 64. Penal Code § 28220(a) states: “Upon submission of firearm purchaser
21 information, the Department of Justice shall examine its records, as well as those
22 records that it is authorized to request from the State Department of State Hospitals
23 pursuant to Section 8104 of the Welfare and Institutions Code, in order to determine
24 if the purchaser is a person described in subdivision (a) of Section 27535, or is
25 prohibited by state or federal law from possessing, receiving, owning, or purchasing
26
27
28

1 a firearm.”⁴

2 65. Defendants’ Department of Justice participates in the National Instant
3 Criminal Background Check System (NICS). Pen. Code § 28220(a).

4 66. A “Certificate of Eligibility” (“COE”) “means a certificate which states
5 that the Department has checked its records and the records available to the
6 Department in the National Instant Criminal Background Check System and
7 determined that the applicant is not prohibited from acquiring or possessing firearms
8 pursuant to Penal Code sections 18205, 29800, 29805, 29815 through 29825, and
9 29900, or Welfare and Institutions Code sections 8100 and 8103, or Title 18, sections
10 921 and 922 of the United States Code, or Title 27, Part 478.32 of the Code of
11 Federal Regulations at the time the check was performed and which ensures that a
12 person who handles, sells, delivers, or has under his or her custody or control any
13 ammunition, is eligible to do so pursuant to Penal Code section 30347.” 11 CCR §
14 4031(d). *See also* Pen. Code § 26710 and 11 CCR § 4030, *et seq.*

15 67. “The initial COE application process includes a firearms eligibility
16 criminal background check and issuance of a certificate, which is valid for one year.
17 Thereafter, the COE must be renewed annually. A COE can be revoked, at any time,
18 if the COE holder becomes prohibited from owning/possessing firearms and
19 ammunition.” *See* Defendants’ website at [https://oag.ca.gov/firearms/cert-](https://oag.ca.gov/firearms/cert-eligibility)
20 [eligibility](https://oag.ca.gov/firearms/cert-eligibility).

21 68. On information and belief, a COE issued by Defendants’ Department
22 of Justice Bureau of Firearms places the certificate holder in their “Rap Back” file,
23 which would notify them immediately should the certificate holder be arrested or
24 otherwise prohibited from purchasing or possessing firearms.

25

26

27 ⁴ The DOJ’s multi-step, acronym-heavy background check process for firearms is
28 detailed in *Silvester v. Harris*, 41 F.Supp.3d 927, 947–952 (E.D. Cal. 2014).

1 **B. The Handgun Ban and “Roster”**

2 69. Defendants’ California Department of Justice compiles, publishes, and
3 maintains “a roster listing all of the handguns that have been tested by a certified
4 testing laboratory, have been determined not to be unsafe handguns, and may be sold
5 in this state pursuant to this part.” Pen Code § 32015.

6 70. Additional information on the Handgun Roster can be found in
7 Defendants’ regulations at California Code of Regulations, title 11, section 4070.

8 71. On information and belief, Defendants’ Roster of Certified Handguns
9 available for sale to law-abiding citizens not exempt from the Handgun Purchase
10 Ban is a small fraction of the total number of handgun makes and models
11 commercially available throughout the vast majority of the United States, all of
12 which are constitutionally protected arms in common use for lawful purposes.

13 72. On information and belief, at the end of 2013, there were 1,273 makes
14 and models of approved handguns, including 883 semiautomatics, on Defendants’
15 Roster. Since then, the Defendants’ Roster has continued to shrink because of the
16 Defendants’ enforcement of the Handgun Purchase Ban.

17 73. As of October 24, 2022, there were only “815 handguns found”—*total*,
18 of all makes, models, and permutations—on Defendants’ Roster.

19 74. Inevitably hastening the rate of shrinkage, effective January 1, 2021,
20 the State amended California’s Handgun Ban under Assembly Bill No. 2847 (2019
21 – 2020 Reg. Sess.) (“AB 2847”), which now expressly requires that, for every single
22 new firearm added to the Roster, Defendants’ Department of Justice must *remove*
23 three firearms added before July 1, 2022, that are not compliant with its current
24 requirements.⁵ Pen. Code. § 31910(b)(7).

25

26

27 ⁵ See Alexei Koseff, “Bullet-tracing bill by [California Assembly-member] David
28 Chiu aims to force issue on gunmakers,” San Francisco Chronicle (March 16,

1 75. Moreover, of the handguns “certified” for Roster inclusion, on
2 information and belief, “about one-third of the Roster’s total listings are comprised
3 of makes and models that do not offer consumers substantive and material choices
4 in the physical attributes, function, or performance of a handgun relative to another
5 listing (*i.e.*, a base model),” because many of the approved handguns are merely the
6 same handgun make and model as another approved model with cosmetic
7 difference(s). *See, e.g., California's Handgun Roster: How big is it, really?*, online
8 at <https://www.firearmspolicy.org/california-handgun-roster> (showing the results of
9 a detailed analysis of the Roster as of January 30, 2019).

10 76. The Handgun Ban, as it stands today, not only forces and requires the
11 Handgun Roster to virtually shrink into oblivion, but, on information and belief, even
12 minor changes to manufacturing processes, materials, and suppliers will cause a
13 previously certified handgun to be removed from the Handgun Roster by Defendants
14 under the State’s laws and Defendants’ policies and enforcement practices.

15 77. Worse, certified handgun models are removed from the Roster by
16 Defendants if the manufacturer does not pay an annual fee to maintain the model on
17 the Roster. Penal Code § 32015(b)(2). On information and belief, due to the Handgun
18 Ban, just as hundreds of handgun makes and models have already been removed
19 from Defendants’ Roster, more handgun makes and models will “drop off” the
20 Roster as manufacturers choose to update their products—as well as their materials,
21 processes, and supply chains—to make them more competitive in the broader
22 civilian market throughout the United States and/or refusing to continue to pay

23 _____
24 2020), at [https://www.sfchronicle.com/politics/article/Assemblyman-Chiu-pushes-](https://www.sfchronicle.com/politics/article/Assemblyman-Chiu-pushes-firearms-industry-to-15132278.php)
25 [firearms-industry-to-15132278.php](https://www.sfchronicle.com/politics/article/Assemblyman-Chiu-pushes-firearms-industry-to-15132278.php).

26 *See also* Alexei Koseff, “[California Governor] Newsom signs bill that compels
27 gunmakers to adopt bullet-tracing technology,” *San Francisco Chronicle* (Sept. 29,
28 2020), at [https://www.sfchronicle.com/politics/article/Newsom-signs-bill-that-](https://www.sfchronicle.com/politics/article/Newsom-signs-bill-that-compels-gunmakers-to-adopt-15607657.php)
[compels-gunmakers-to-adopt-15607657.php](https://www.sfchronicle.com/politics/article/Newsom-signs-bill-that-compels-gunmakers-to-adopt-15607657.php).

1 California’s extortive annual renewal fees, making them ineligible to renew on the
2 Roster, further reducing the availability of constitutionally protected arms that
3 individual adults not disqualified from exercising Second Amendment rights have a
4 fundamental right to acquire and possess.

5 78. Indeed, Defendants’ list of “De-Certified Handguns” shows hundreds
6 of handgun models have been removed from the Roster since December of 2001,
7 including 33 this year alone, <https://oag.ca.gov/firearms/de-certified-handguns> (last
8 visited October 24, 2022), whereas just one handgun model has been “recently
9 added” this month according to Defendants’ list of “Recently Added Handgun
10 Models,” <https://oag.ca.gov/firearms/certified-handguns/recently-added> (last visited
11 October 24, 2022).

12 79. Handguns that have passed California’s tests and were certified by
13 Defendants do not become “unsafe”—much less lose their constitutional
14 protection—simply because a manufacturer does not pay an annual fee.

15 80. Handguns that do not have one or all of the “safety” devices as required
16 under the Handgun Ban are neither “dangerous” nor “unusual” and are instead in
17 common use for lawful purposes throughout the United States.

18 81. Handguns that do not have chamber load indicators are neither
19 “dangerous” nor “unusual” and are instead in common use for lawful purposes
20 throughout the United States.

21 82. Handguns that do not have magazine disconnect mechanisms are
22 neither “dangerous” nor “unusual” and are instead in common use for lawful
23 purposes throughout the United States.

24 83. Handguns that do not have “microstamping” technology are neither
25 “dangerous” nor “unusual” and are instead in common use for lawful purposes
26 throughout the United States.

27 84. Any of the attributes, systems, and “safety” devices required under the
28 Handgun Ban can fail or be altered or removed by a handgun’s possessor, and the

1 absence of one or all of them does not strip the protection for otherwise
2 constitutionally protected arms.

3 85. The attributes, systems, and “safety” devices required under
4 California’s Handgun Ban are not sufficient to guarantee a handgun’s safe use.

5 86. The attributes, systems, and “safety” devices required under the
6 Handgun Ban cannot replace safe and responsible gun handling.

7 87. Microstamping technology is not a safety device.

8 88. Microstamping technology has not been shown to viably support any
9 law enforcement purpose.

10 89. On information and belief, as of November 8, 2020, there were no
11 commercially available semiautomatic handguns manufactured in the United States
12 that have the microstamping technology required under the Handgun Ban.

13 90. On information and belief, as of January 4, 2021, there are no
14 commercially available semiautomatic handguns manufactured in the United States
15 that have the microstamping technology required under the Handgun Ban.

16 91. On information and belief, as of November 8, 2020, there were no
17 commercially available semiautomatic handguns manufactured in the United States
18 that met all of the requirements under the Handgun Ban.

19 92. On information and belief, as of January 4, 2021, there were no
20 commercially available semiautomatic handguns manufactured in the United States
21 that meet all of the requirements under the Handgun Ban.

22 93. On information and belief, as of October 24, 2022, there are still no
23 commercially available semiautomatic handguns manufactured in the United States
24 that meet all of the requirements under the Purchase Ban.

25 94. California law requires that handgun purchasers successfully complete
26 a test, pay a fee, and acquire a valid FSC before they purchase and take possession
27
28

1 of any firearm, including handguns. Penal Code § 31610, *et seq.*⁶

2 95. Defendants’ publicly available Firearms Safety Certificate (“FSC”)
3 Study Guide, a document published by the Office of the Attorney General and
4 California Department of Justice Bureau of Firearms, Defendants’ Spanish-language
5 version of the FSC Study Guide, and Defendants’ FSC “MANUAL for California
6 Firearms Dealers and DOJ Certified Instructors” are available on Defendants’
7 website at <https://oag.ca.gov/firearms/fsc>.

8 96. In their publicly available FSC Study Guide, Defendants state, in red
9 type: “REMEMBER: Ignorance and carelessness can result in firearm accidents.
10 Basic gun safety rules must be applied ALL OF THE TIME.” (Color and
11 capitalization in original.)

12 97. In the first section of Chapter 1 of Defendants’ FSC Study Guide
13 (captioned “THE SIX BASIC GUN SAFETY RULES”), the Guide states: “There
14 are six basic gun safety rules for gun owners to understand and practice at all times:
15 1. Treat all guns as if they are loaded. 2. Keep the gun pointed in the safest possible
16 direction. 3. Keep your finger off the trigger until you are ready to shoot. 4. Know
17 your target, its surroundings, and beyond. 5. Know how to properly operate your
18 gun. 6. Store your gun safely and securely to prevent unauthorized use. Guns and
19 ammunition should be stored separately.” (Line breaks removed.)

20 98. Under common rules of firearm safety, and within the knowledge
21 required for the State’s FSC and safe handling demonstration, is the fundamental
22 rule that all firearms must always be treated as though they are loaded.

23 99. It is irresponsible and unsafe to rely on “safety” devices required under
24 the Handgun Ban.

25 100. Additionally, Defendants’ require firearm purchasers, the retailer, and
26

27 ⁶ See also 11 CCR § 4250, *et seq.*, and Defendants’ website at
28 <https://oag.ca.gov/firearms/fscfaqs>.

1 the DOJ Certified Instructor licensed and permitted to proctor the test, to conduct,
2 successfully pass, and certify in a “Safe Handling Demonstration Affidavit” (online
3 at <https://oag.ca.gov/sites/all/files/agweb/pdfs/firearms/forms/hscaff.pdf>) signed
4 under penalty of perjury, that the purchaser or transferee “performed the safe
5 handling demonstration as required in Penal Code sections 26850, 26853, 26856,
6 26859, or 26860, as applicable, with the firearm (or one of the same make and model)
7 referenced” on the Dealer’s Record of Sale (DROS) number associated with the
8 purchase or transfer.

9
10 **COUNT ONE**
11 **42 U.S.C. § 1983**
12 **RIGHT TO KEEP AND BEAR ARMS**
13 **U.S. CONST., AMENDS. II AND XIV**

14 101. Plaintiffs incorporate herein by reference the foregoing paragraphs as if
15 fully set forth herein.

16 102. There is an actual and present controversy between the parties.

17 103. The Second Amendment to the United States Constitution guarantees
18 “the right of the people to keep and bear Arms.” U.S. CONST. AMEND. II.
19 Plaintiffs, and all similarly situated members of Institutional Plaintiffs, who are all
20 eligible to exercise their Second Amendment rights, wish to keep and bear
21 constitutionally protected arms for self-defense and other lawful purposes.

22 104. The Fourteenth Amendment to the United States Constitution provides
23 in pertinent part:

24 No state shall make or enforce any law which shall abridge the
25 privileges or immunities of citizens of the United States; nor shall any
26 state deprive any person of life, liberty, or property, without due process
27 of law; nor deny to any person within its jurisdiction the equal
28 protection of the laws.

105. The Second Amendment is fully applicable to the States through the

1 Fourteenth Amendment’s Due Process and Privileges or Immunities Clauses.
2 *McDonald v. City of Chicago*, 561 U.S. 742, 750 (2010); *id.* at 805 (Thomas, J.,
3 concurring).

4 106. Because of the Defendants’ enforcement of the laws, regulations,
5 policies, practices, and customs underlying the purchase prohibitions of the Handgun
6 Ban, Plaintiffs, and all similarly situated members of Institutional Plaintiffs, cannot
7 purchase new constitutionally protected arms without suffering criminal liability.

8 107. Nothing in the “Nation’s historical tradition of firearm regulation”
9 supports the heavy-handed purchase restrictions here. *Bruen*, 142 S. Ct. at 2130.

10 108. Individuals in California have a right to keep and bear arms, including
11 but not limited to, buying, selling, transferring, self-manufacturing or assembling,
12 transporting, carrying, and practicing safety and proficiency with, firearms,
13 ammunition, magazines, and appurtenances, under the Second and Fourteenth
14 Amendments to the United States Constitution.

15 109. This fundamental, individual right to keep and bear firearms includes
16 the right to acquire modern handguns in common use for lawful purposes—indeed,
17 arms that are lawfully sold and possessed throughout the United States—such as
18 those the Handgun Ban prevents common law-abiding citizens from purchasing at a
19 licensed retailer.

20 110. The text of the Second Amendment, which guarantees “the right of the
21 people to keep and bear Arms,” implicitly includes the right to so acquire firearms.
22 Further, the “right to keep arms, necessarily involves the right to purchase them, to
23 keep them in a state of efficiency for use, and to purchase and provide ammunition
24 suitable for such arms.” *See Andrews v. State*, 50 Tenn. 165, 178 (1871); *accord*
25 *Teixeira v. County of Alameda*, 873 F.3d 670, 678 (2017).

26 111. Further, without constitutional protections for the acquisition as well as
27 the manufacturing of firearms, the “right of the people to keep and bear Arms” would
28 be in jeopardy. *See Ezell*, 651 F.3d at 704 (clarifying that “[t]he right to possess

1 firearms for protection implies a corresponding right to acquire and maintain
2 proficiency in their use; the core right wouldn't mean much without the training and
3 practice that make it effective."); *Ill. Ass'n of Firearms Retailers v. City of Chicago*,
4 961 F. Supp. 2d 928, 930, 938 (N.D. Ill. 2014) (holding that "the right to keep and
5 bear arms for self-defense under the Second Amendment . . . must also include the
6 right to acquire a firearm . . .").

7 112. Contrary to the regulations like those in Penal Code sections 31900, *et*
8 *seq.* and 32000, *et seq.*, underlying the Handgun Ban and related Handgun Roster,
9 no founding era precedent exists for declaring "unsafe" and prohibiting the
10 commercial sale of firearms otherwise widely available and in common use for
11 lawful purposes among ordinary law-abiding citizens; such regulations only exist in
12 a handful of jurisdictions and all of them are of recent origin—the *earliest* was
13 Maryland's, enacted in 1988. Md. Code Ann., Pub. Safety § 5-405.

14 113. The purchase prohibitions of the Handgun Ban prevent law-abiding
15 citizens, like and including Plaintiffs, and all similarly situated members of
16 Institutional Plaintiffs, from acquiring and thus possessing for lawful purposes
17 "instruments that constitute bearable arms" protected under the Second Amendment.

18 114. These unprecedented regulations are plainly inconsistent with the
19 "Nation's historical tradition of firearm regulation." *See Bruen*, 142 S. Ct. at 2130.
20 Accordingly, these restrictions on the purchase and acquisition of firearms fall
21 directly within—and are proscribed by—the Second Amendment's "unqualified
22 command." *Bruen*, 142 S. Ct. at 2130 (quoting *Konigsberg*, 366 U.S. at 50, n.10).

23 115. The Handgun Ban's prohibition on the purchase of constitutionally
24 protected arms and maintenance of the Roster for purposes of enforcing this
25 proscription in the absence of the necessary historical precedent fails full stop under
26 *Bruen*, rendering them unconstitutional both facially and as applied in this case.

27 116. "The very enumeration of the [Second Amendment] right takes out of
28 the hands of government . . . the power to decide on a case-by-case basis whether

1 the right is *really worth* insisting upon.” *Heller*, 554 U.S. at 635 (emphasis in
2 original).

3 117. The Second Amendment is not a “second-class right, subject to an
4 entirely different body of rules than the other Bill of Rights guarantees,” *McDonald*,
5 561 U.S. 742, 780, and it cannot “be singled out for special—and especially
6 unfavorable—treatment.” *Id.* at 778–79.

7 118. *Bruen*, 142 S. Ct. 2111, made this clear by expressly rejecting all
8 interest balancing and the Ninth Circuit’s prior “two-step” approach in the context
9 of Second Amendment claims.

10 119. “*Heller* and *McDonald* do not support applying means-end scrutiny in
11 the Second Amendment context. Instead, the government must affirmatively prove
12 that its firearms regulation is part of the historical tradition that delimits the outer
13 bounds of the right to keep and bear arms.” 142 S. Ct. at 2127. Rather, “*Heller* ...
14 demands a test rooted in the Second Amendment’s text, as informed by history.” *Id.*

15 120. Thus, *Bruen* makes clear that the Ninth Circuit’s former two-step
16 approach and interest-balancing applied in *Peña v. Lindley*, 898 F.3d 969 (9th Cir.
17 2018), which previously upheld a prior version of some of the laws challenged
18 herein, are inapplicable and improper in Second Amendment cases.

19 121. *Bruen* did not create a new test but instead applied the very test the
20 Court established in *Heller* in 2008. “The test that we set forth in *Heller* and apply
21 today requires courts to assess whether modern firearms regulations are consistent
22 with the Second Amendment’s text and historical understanding.” *Id.*, at 2131.

23 122. “*Heller*’s methodology centered on constitutional text and history.
24 Whether it came to defining the character of the right (individual or militia
25 dependent), suggesting the outer limits of the right, or assessing the constitutionality
26 of a particular regulation, *Heller* relied on text and history. It did not invoke any
27 means-end test such as strict or intermediate scrutiny.” *Id.*, at 2128–29.

28 123. The plain text of the Second Amendment covers the conduct the

1 Plaintiffs, and all similarly situated members of Institutional Plaintiffs, wish to
2 engage in (“keep and bear arms”) and the arms they wish to keep and bear. “[T]he
3 Second Amendment extends, prima facie, to all instruments that constitute bearable
4 arms,” *Bruen*, 142 S. Ct., at 2132 (quoting *Heller*, 554 U. S., at 582).

5 124. Since the conduct is covered by the Second Amendment’s plain text,
6 “the Constitution presumptively protects that conduct. To justify its regulation, the
7 government . . . must demonstrate that the regulation is consistent with this Nation’s
8 tradition of firearm regulation.” *Bruen*, 142 S. Ct. at 2126.

9 125. *Heller* has already established the relevant contours of the tradition:
10 Bearable arms that are presumptively protected by the Second Amendment cannot
11 be banned unless they are both dangerous *and* unusual.

12 126. The Second Amendment’s “reference to ‘arms’ does not apply ‘only
13 [to] those arms in existence in the 18th century.’ ” *Bruen*, 142 S. Ct., at 2132 (quoting
14 *Heller*, 554 U. S., at 582). “Just as the First Amendment protects modern forms of
15 communications, and the Fourth Amendment applies to modern forms of search, the
16 Second Amendment extends, prima facie, to all instruments that constitute bearable
17 arms, even those that were not in existence at the time of the founding.” *Id.* (citations
18 omitted).

19 127. And “[w]hatever the likelihood that handguns were considered
20 dangerous and unusual during the colonial period, they are indisputably in common
21 use for self-defense today. They are, in fact, the quintessential self-defense weapon.”
22 *Bruen*, 142 S. Ct. 2111, at 2143 (quoting *Heller*, 554 U. S., at 629, 128 S. Ct. 2783,
23 171 L. Ed. 2d 637) (cleaned up).

24 128. “Thus, even though the Second Amendment’s definition of ‘arms’ is
25 fixed according to its historical understanding, that general definition covers modern
26 instruments that facilitate armed self-defense. *Cf. Caetano v. Massachusetts*, 577 U.
27 S. 411, 411-412, 136 S. Ct. 1027, 194 L. Ed. 2d 99 (2016) (*per curiam*) (stun guns).”
28 *Id.*

1 129. Millions of handguns prohibited for sale to the State’s law-abiding
2 citizens are commonly possessed and used for self-defense and other lawful purposes
3 in the vast majority of states, securing their protection from such regulation.

4 130. In the approximately 400-year history of the colonies and later the
5 United States, no regulations at all like the Handgun Ban appeared until recently in
6 only a few states. That is hardly a historical tradition of such regulations.

7 131. To reiterate, the Second Amendment to the United States Constitution
8 provides: “A well-regulated Militia being necessary to the security of a free State,
9 the right of the people to keep and bear Arms *shall not* be infringed.”

10 132. Defendants are individually and collectively responsible for the
11 formulation, issuance, implementation, and/or enforcement of the laws, regulations,
12 policies, practices, and customs underlying the purchase prohibitions of the Handgun
13 Ban.

14 133. Defendants have enforced and will continue to enforce the purchase
15 prohibitions under the Handgun Ban against Individual Plaintiffs, Retailer Plaintiffs
16 and their customers, and similarly situated Institutional Plaintiffs’ members.

17 134. Defendants’ enforcement of the purchase prohibitions under the
18 Handgun Ban has prevented and continues to prevent Individual Plaintiffs, Retailer
19 Plaintiffs’ customers, and similarly situated Institutional Plaintiffs’ members from
20 purchasing new constitutionally protected handguns in violation of their rights
21 protected under the Second and Fourteenth Amendments to the United States
22 Constitution.

23 135. Individual Plaintiffs, Retailer Plaintiffs and their customers, and
24 similarly situated Institutional Plaintiffs’ members reasonably fear that Defendants
25 will enforce the purchase prohibitions under the Handgun Ban, including associated
26 criminal laws and civil penalties, against them should they violate the same.

27 136. 42 U.S.C. § 1983 creates a cause of action against state actors who
28 deprive individuals of federal constitutional rights under color of state law.

No. 23-55367

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

LANA RAE RENNA, et al.,
Plaintiffs-Appellees,

v.

ROB BONTA, in his official capacity as Attorney General of California; and
ALISON MENDOZA, in her official capacity as Director of the Department of Justice
Bureau of Firearms,
Defendants-Appellants.

**On Appeal from the United States District Court
for the Southern District of California**
No. 3:20-cv-02190-DMS-DEB
The Honorable Dana M. Sabraw, Judge

**EXCERPTS OF RECORD
VOLUME 3 OF 3**

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May 12, 2023

ER-346

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

LANA RAE RENNA, et al.,

Case No. 20-cv-2190-DMS-DEB

Plaintiffs,

**DECLARATION OF JOSEPH OSTINI
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS FIRST
AMENDED COMPLAINT**

vs.

Date / Time: TBD

Courtroom: 13A

Judge: Hon. Dana M. Sabraw

XAVIER BECERRA, et al.,

Defendants.

I. DECLARATION OF JOSEPH OSTINI

I, Joseph Ostini, declare as follows:

1. I am not a party in the above-titled action. I am over the age of 18, have personal knowledge of the facts referred to in this declaration, and am competent to testify to the matters stated below.

2. I am a licensed attorney in the state of California.

3. I have reviewed and I am familiar with the various firearms definitions contained under the California Penal Code.

4. From November 8, 2020, to November 30, 2020, I conducted an Internet search of all new commercially available firearms for sale to U.S. residents.

5. This search was conducted specifically by reviewing the websites of most readily identified major firearms manufacturers within the U.S. As part of my search, I identified 40 different handgun manufacturers in the U.S., which include most of the largest manufacturers of different types of handguns in the U.S.

6. In conducting this search, I reviewed Cal. Penal Code sec. 31900, 31905, and 31910 et seq. Specifically, I identified semiautomatic pistols and revolvers and searched to see how many different types of handguns from these manufacturers are commercially available for purchase to residents in a majority of states and yet are banned by California's roster requirements.

7. In analyzing these Penal Code sections, I applied the law to the prohibited features and stated exceptions that these firearms possessed. I then made a determination of which handguns were likely prohibited by California's roster requirements.

8. Attached as **Exhibit 1** is a true and correct copy of a table I created listing the numerous firearms that are prohibited in California but freely available for sale in much of the U.S. This table is supported by the embedded hyperlinks illustrating the handguns available for sale and by their model numbers.

9. In reviewing the 40 different manufacturers of pistols, I identified and catalogued which pistols available for sale are on the California roster and which ones are not.

10. Below is a list of hyperlinks to websites containing additional relevant information on which I relied concerning the handguns which are commercially available throughout the country but banned under California's handgun roster:

<https://oag.ca.gov/firearms/certified-handguns/search> (“Handguns Certified for Sale” in California)

<https://oag.ca.gov/sites/all/files/agweb/pdfs/firearms/forms/op.pdf>
 (“California's Roster of Exempted Olympic Competition Pistols”)

<https://www.moneytalksnews.com/slideshows/the-biggest-gun-companies-in-the-u-s-market/> (“The Biggest Gun Companies in the U.S. Market”)

<https://web.archive.org/web/20181124171330/http://www.calgunsfoundation.org/roster> (“California DOJ’s Handgun Roster, Microstamping Requirement, and Legal Action Against Them”)

II. ANALYSIS

A. Off-Roster Handguns Are Commonly Sold Outside of California.

Throughout the United States, handguns not listed on California’s roster are commonly bought and sold. Only a few states have anything even remotely similar to California’s roster. It is worth noting that most Americans that purchase handguns outside of California do not purchase California-roster handguns because they are viewed as outdated. This is because very few new models of semiautomatic handguns are available for purchase to California residents.

A few exceptions do exist, such as the Olympic Pistol exception and buying handguns on the used market from former law enforcement via a private-party sale exception. *See e.g.*, Pen. Code § 32105. But these sales and exceptions make up an exceedingly small percentage of the total handguns sold within California.

In addition, it is worth noting that modern semiautomatic handguns are not on the roster. For example, the Generation 5 Glock fetches a premium price when available for sale to California residents via the private-party law-enforcement exception, which, again, is an exception largely unavailable to the ordinary Californian. As a result, this limits the class of people that can buy modern handguns.

Lastly, the provided data shows that the overwhelming majority of handguns for sale in the United States are not on the roster. As a result, off-roster handguns are the norm outside of California. Therefore, these modern off-roster handguns are in common use throughout the United States.

B. The Number of Firearms on the Roster Is Dropping Steadily

The number of firearms on the California roster is dropping steadily. Presently, approximately 805 handguns are listed on the roster. However, many of these handguns are virtually identical to one another. Small cosmetic differences are enough to make the firearms technically different firearms under the law, thus requiring a separate roster entry in order to be legal for purchase.

In addition, every year, handguns are removed from the roster for a variety of reasons. To be kept on the roster, a manufacturer must annually reapply to the roster and pay a fee. For many manufacturers, compliance is not worth the effort or

profitable enough to warrant the time and resources necessary to meet these requirements annually. In addition, the firearms industry is constantly evolving. Firearms companies change hands, go out of business, or abandon old designs because changes in technology or regulations no longer make them profitable. Consequently, these companies do not renew their handguns on the roster, and those handguns are removed from the roster, further reducing the available lot.

The decertified handguns are not being replaced with new or additional substitutes. In fact, it is widely known that no new handguns have been added to the roster since 2013, when California added the controversial “microstamping” requirement.¹ And, significantly, under newly enacted legislation (AB 2847), the DOJ must remove three of the “non-compliant” or “grandfathered” handgun models from the roster for every new “compliant” handgun model added to the roster. This new mandate will inevitably result in further reducing the roster of available handguns for ordinary Californians. Indeed, as more “grandfathered” handguns fall off the roster because either the manufacturer cannot renew the certification due to changes in the handgun’s design or features that render it “noncompliant” or the manufacturer simply elects not to renew the certification in favor of investing its

¹ Cal. Penal Code § 31910(b)(7)(A).

resources into more modern models, the total number of guns on the roster could shrink to an exceedingly small number, possibly even to zero, in the coming years.

It is worth noting that federal courts in recent years—including the U.S. Supreme Court—have recognized more clearly the right to bear arms. One need look only to the two most prominent Supreme Court cases in recent years to recognize this. *McDonald* and *Heller* indicated that universal handgun bans are unconstitutional. It is reasonable to conclude that California’s roster could be viewed as a de facto handgun ban and thus unconstitutional under the same legal reasoning.²

In conducting my survey of 40 different firearms manufacturers, I consulted various trade publications to determine which are the most popular and largest manufacturers of handguns in the United States. After consulting these trade publications, I went to the websites of these 40 manufacturers to determine approximately how many of their handguns are on California’s roster. While no uniform method of identifying the available firearms models currently exists, one can quickly ascertain that the vast majority of the surveyed handguns are not on the roster.

² *McDonald v. City of Chicago*, 561 U.S. 742 (2010); *Heller v. District of Columbia*, 554 U.S. 570 (2008).


Specifically, of the 40 manufacturers surveyed, I identified a total of 2,818 different models of handguns. Of those, only 699 models were included on the roster during the time period that I conducted this survey (November 8, 2020 to November 30, 2020), while the other 2,119 models were excluded from the roster. Thus, more than two-thirds (66%) of the surveyed handguns were excluded. Certainly, more available handgun models exist that do not possess the feature and design requirements necessary for roster inclusion. Many small manufacturers of firearms which my survey did not address have not gone through the effort to maintain their firearms on the roster because of the expenses and effort involved. In any complete survey of all handgun manufacturers and their handguns, it is quite likely the results would show that the percentage of otherwise commercially available handguns actually excluded from California's roster is substantially higher. Therefore, an exclusion percentage of 66% represents an optimistic view of the percentage of handguns which are widely available throughout the country but which ordinary California residents cannot lawfully purchase or even self-manufacture.

IV. Conclusion

In analyzing California's handgun roster, we must conclude that the roster has the effect of allowing California residents to buy (and self-manufacture) only a small

percentage of the total kinds of commonly used handguns available for sale. In addition, we can conclude that only a few states, like Maryland and Massachusetts, have a roster like California's and that this class of laws is of a very recent legal vintage. The ultimate effect of California's roster, limiting access to new handguns, coupled with the state's concomitant heavy regulation of self-made firearms, is to render it nearly impossible for ordinary Californians to obtain modern handguns otherwise in common use across the country.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed within the United States on February 11, 2021.



Joseph Ostini, Esq.

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
American Tactical Imports	GSG FIREFLY HGA . 22LR BLACK 4.9" BL. THREADED 10RD - PURPLE	GERGU2210TFFL	NO	https://www.americantactical.us/61161/detail.html
Accu-Tek	AT-380 II	not available	YES	http://www.accu-tekfirearms.com/a380ii.html
Accu-Tek	HC-380	not available	NO	http://www.accu-tekfirearms.com/hc380.html
Accu-Tek	LT-380	not available	NO	http://www.accu-tekfirearms.com/lc380.html
American Derringer	LM4 Simmering	not available	NO	http://www.amderringer.com/lms.html
American Derringer	LM5 Simmering	not available	NO	http://www.amderringer.com/lms.html
Steyr	A2 MF Pistol	not available	NO	https://www.steyr-firearms.com/us/firearms/a2-mf-pistol
AUTO-ORDNANCE	Auto Ordnance 1911 A-1 PKZA / Parkerized Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/auto-ordnance-1911-1-pkza
AUTO-ORDNANCE	1911A1 GI Specs. Matte Black Finish, 9mm w/ Wood Grips U.S. Logo	1911BKOW9	NO	https://shopkahfirearmsgroup.com/1911a1-gi-specs-matte-black-finish-9mm-w-wood-grips-u-s-logo-1/
AUTO-ORDNANCE	1911A1, GI Specs., Matte Black Finish, .45Cal w/U.S. Logo Grip, MA Approved	1911BKOWMA	NO	https://shopkahfirearmsgroup.com/firearms/auto-ordnance-1911bkowma.asp
AUTO-ORDNANCE	1911A1, GI Specs., Matte Black Finish, .45Cal, MA Approved	1911BKOMA	NO	https://shopkahfirearmsgroup.com/firearms/auto-ordnance-1911bkoma.asp
AUTO-ORDNANCE	1911A1, GI Specs., Matte Black Finish, 45Cal	1911BKO	NO	https://shopkahfirearmsgroup.com/firearms/auto-ordnance-1911bko.asp
AUTO-ORDNANCE	1911A1, GI Specs., Matte Black Finish, 45Cal w/ U.S. Logo Grip	1911BKOW	NO	https://shopkahfirearmsgroup.com/firearms/auto-ordnance-1911bkow.asp
AUTO-ORDNANCE	1911A1, GI Specs., Matte Black Finish, Commander Model w/ Wood Grips, 45Cal	1911BKOWC	NO	https://shopkahfirearmsgroup.com/auto-ordnance/pistols/1911/#
AUTO-ORDNANCE	1911A1, GI Specs., Matte Black Finish, Commander Model, 45Cal	1911BKOC	NO	https://shopkahfirearmsgroup.com/copy-of-1911a1-gi-specs-matte-black-finish-1/
AUTO-ORDNANCE	75th Anniversary Iwo Jima 1911, Tribute Edition .45 Cal., 5" barrel	1911BKOWC6	NO	https://shopkahfirearmsgroup.com/75th-anniversary-iwo-jima-1911-tribute-edition-45-cal-5-barrel-1/
AUTO-ORDNANCE	Case Hardened 1911, .45Cal., w/ U.S. Logo Grip	1911GCH	NO	https://shopkahfirearmsgroup.com/case-hardened-1911-45cal-w-u-s-logo-grip/
AUTO-ORDNANCE	Liberty Special Edition 1911, .45 Cal. 5" barrel	1911BKOC6	NO	https://shopkahfirearmsgroup.com/liberty-special-edition-1911-45-cal-5-barrel-1/
AUTO-ORDNANCE	Revolution Special Edition 1911, .45 Cal. 5" barrel	1911BKOC7	NO	https://shopkahfirearmsgroup.com/revolution-special-edition-1911-45-cal-5-barrel-1/
AUTO-ORDNANCE	Squadron Special Edition WW2 1911, .45Cal., w/ U.S. Logo Grip	1911BKOWC3	NO	https://shopkahfirearmsgroup.com/squadron-special-edition-ww2-1911-45cal-w-u-s-logo-grip/
AUTO-ORDNANCE	"PROMISES KEPT" CUSTOM 1911	not available	NO	https://www.auto-ordnance.com/promises-kept-1911/
Beretta	92FSR_22 Suppressor Ready Kit	J90A192FSRF19SK	NO	https://www.beretta.com/en-us/92fsr-22-suppressor-ready-kit/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Beretta	92X Performance	J92XR21	NO	https://www.beretta.com/en-us/92x-performance/
Beretta	92X Performance	J92XR20	NO	https://www.beretta.com/en-us/92x-performance/
Beretta	92X Full Size	J92FR915G	NO	https://www.beretta.com/en-us/92x-full-size/
Beretta	92X Full Size	J92FR921G	NO	https://www.beretta.com/en-us/92x-full-size/
Beretta	92X Full Size	J92FR920G	NO	https://www.beretta.com/en-us/92x-full-size/
Beretta	92X Full Size	J92FR915	NO	https://www.beretta.com/en-us/92x-full-size/
Beretta	92X Full Size	J92FR921	NO	https://www.beretta.com/en-us/92x-full-size/
Beretta	92X Full Size	J92FR920	NO	https://www.beretta.com/en-us/92x-full-size/
Beretta	92X Centurion	J92QR915G	NO	https://www.beretta.com/en-us/92x-centurion/
Beretta	92X Centurion	J92QR921G	NO	https://www.beretta.com/en-us/92x-centurion/
Beretta	92X Centurion	J92QR920G	NO	https://www.beretta.com/en-us/92x-centurion/
Beretta	92X Centurion	J92QR915	NO	https://www.beretta.com/en-us/92x-centurion/
Beretta	92X Centurion	J92QR921	NO	https://www.beretta.com/en-us/92x-centurion/
Beretta	92X Centurion	J92QR920	NO	https://www.beretta.com/en-us/92x-centurion/
Beretta	92X Compact W/Rail	J92CR921G	NO	https://www.beretta.com/en-us/92x-compact-w-rail/
Beretta	92X Compact W/Rail	J92CR920G	NO	https://www.beretta.com/en-us/92x-compact-w-rail/
Beretta	92X Compact W/Rail	J92CR921	NO	https://www.beretta.com/en-us/92x-compact-w-rail/
Beretta	92X Compact W/Rail	J92CR920	NO	https://www.beretta.com/en-us/92x-compact-w-rail/
Beretta	92X Compact	J92C921G	NO	https://www.beretta.com/en-us/92x-compact/
Beretta	92X Compact	J92C920G	NO	https://www.beretta.com/en-us/92x-compact/
Beretta	92X Compact	J92C921	NO	https://www.beretta.com/en-us/92x-compact/
Beretta	92X Compact	J92C920	NO	https://www.beretta.com/en-us/92x-compact/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Beretta	M9A3 Black	J92M9A3GM0	NO	https://www.beretta.com/en-us/m9a3-black/
Beretta	M9A3 Black	J92M9A3G0	NO	https://www.beretta.com/en-us/m9a3-black/
Beretta	M9A3 Black	J92M9A3M0	NO	https://www.beretta.com/en-us/m9a3-black/
Beretta	M9A3 Black	J9M9A30	NO	https://www.beretta.com/en-us/m9a3-black/
Beretta	Px4 Storm Carry	not available	NO	https://www.beretta.com/en-us/px4-storm-carry/
Beretta	APX Carry Wolf Grey	JAXN92006	NO	https://www.beretta.com/en-us/apx-carry-wolf-grey/
Beretta	APX CARRY ODG	JAXN92007	NO	https://www.beretta.com/en-us/apx-carry-odg/
Beretta	APX Carry Black	JAXN920	NO	https://www.beretta.com/en-us/apx-carry-black/
Beretta	APX Carry FDE	JAXN92005	NO	https://www.beretta.com/en-us/apx-carry-fde/
Beretta	92G Elite LTT Centurion	J92GG9L TT	NO	https://www.beretta.com/en-us/92g-elite-ltt-centurion/
Beretta	92G Elite LTT Centurion	J92GG9L TTM	NO	https://www.beretta.com/en-us/92g-elite-ltt-centurion/
Beretta	92G Elite LTT Compact	J92GG9L TT	NO	https://www.beretta.com/en-us/92g-elite-ltt-compact/
Beretta	92G Elite LTT Compact	J92GG9L TTM	NO	https://www.beretta.com/en-us/92g-elite-ltt-compact/
Beretta	92G ELITE LTT	J92GG9L TTM	NO	https://www.beretta.com/en-us/92g-elite-ltt/
Beretta	92G ELITE LTT	J92GG9L TT	NO	https://www.beretta.com/en-us/92g-elite-ltt/
Beretta	PX4 Storm Compact Carry	JXC9GEL	NO	https://www.beretta.com/en-us/px4-storm-compact-carry/
Beretta	Px4 Storm Full	JXF5F25	NO	https://www.beretta.com/en-us/px4-storm-full/
Beretta	https://bersa.eagleimportsinc.com/bersa/firearms/disc-models/models/bersaboc9mm-1121	JXF9G20CA	YES	https://www.beretta.com/en-us/px4-storm-full/
Beretta	Px4 Storm Full	JXF420CA	YES	https://www.beretta.com/en-us/px4-storm-full/
Beretta	Px4 Storm Full	JXF9F20CA	YES	https://www.beretta.com/en-us/px4-storm-full/
Beretta	Px4 Storm Full	JXF9F21NS	NO	https://www.beretta.com/en-us/px4-storm-full/
Beretta	Px4 Storm Full	JXF9F20NS	NO	https://www.beretta.com/en-us/px4-storm-full/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Beretta	Px4 Storm Full	JXF4F20	NO	https://www.beretta.com/en-us/px4-storm-full/
Beretta	Px4 Storm Full	JXF4F21	NO	https://www.beretta.com/en-us/px4-storm-full/
Beretta	Px4 Storm Full	JXF9F20	YES	https://www.beretta.com/en-us/px4-storm-full/
Beretta	Px4 Storm Full	JXF9F21	NO	https://www.beretta.com/en-us/px4-storm-full/
Beretta	Px4 Storm Sub Compact	JXS4F20FC	NO	https://www.beretta.com/en-us/px4-storm-subcompact/
Beretta	Px4 Storm Sub Compact	JXS4F20	NO	https://www.beretta.com/en-us/px4-storm-subcompact/
Beretta	Px4 Storm Sub Compact	JXS9F21	NO	https://www.beretta.com/en-us/px4-storm-subcompact/
Beretta	Px4 Storm SD Type F	JXF5F45	NO	https://www.beretta.com/en-us/px4-storm-sd-type-f/
Beretta	Px4 Storm Inox	JXF4F50FC	NO	https://www.beretta.com/en-us/px4-storm-inox/
Beretta	Px4 Storm Inox	JXF4F50	NO	https://www.beretta.com/en-us/px4-storm-inox/
Beretta	Px4 Storm Inox	JXF4F51	NO	https://www.beretta.com/en-us/px4-storm-inox/
Beretta	Px4 Storm Inox	JXF9F50FC	NO	https://www.beretta.com/en-us/px4-storm-inox/
Beretta	Px4 Storm Inox	JXF9F50	NO	https://www.beretta.com/en-us/px4-storm-inox/
Beretta	Px4 Storm Inox	JXF9F51	NO	https://www.beretta.com/en-us/px4-storm-inox/
Beretta	M9A3 FDE & Black	J92M9A3GM4	NO	https://www.beretta.com/en-us/m9a3-fde-and-black/
Beretta	APX Combat	JAXF921701	NO	https://www.beretta.com/en-us/apx-combat/
Beretta	M9A3 FDE & Black	J92M9A3M4	NO	https://www.beretta.com/en-us/m9a3-fde-and-black/
Beretta	M9A3 FDE & Black	J92M9A34	NO	https://www.beretta.com/en-us/m9a3-fde-and-black/
Beretta	M9A3 Green & Black	J92M9A3GM2	NO	https://www.beretta.com/en-us/m9a3-green-and-black/
Beretta	M9A3 Green & Black	J92M9A3M2	NO	https://www.beretta.com/en-us/m9a3-green-and-black/
Beretta	M9A3 Green & Black	J92M9A32	NO	https://www.beretta.com/en-us/m9a3-green-and-black/
Beretta	M9A3 Black & Green	J92M9A3GM1	NO	https://www.beretta.com/en-us/m9a3-black-and-green/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Beretta	M9A3 Black & Green	J92M9A3M1	NO	https://www.beretta.com/en-us/m9a3-black-and-green/
Beretta	M9A3 Black & Green	J92M9A31	NO	https://www.beretta.com/en-us/m9a3-black-and-green/
Beretta	M9A3 Black & Gray	J92M9A3GM3	NO	https://www.beretta.com/en-us/m9a3-black-and-gray/
Beretta	M9A3 Black & Gray	J92M9A3M3	NO	https://www.beretta.com/en-us/m9a3-black-and-gray/
Beretta	M9A3 Black & Gray	J92M9A33	NO	https://www.beretta.com/en-us/m9a3-black-and-gray/
Beretta	APX Target	JAXF921703	NO	https://www.beretta.com/en-us/apx-target/
Beretta	APX Centurion Combat	JAXQ921701	NO	https://www.beretta.com/en-us/apx-centurion-combat/
Beretta	APX Centurion Combat	JAXQ920701	NO	https://www.beretta.com/en-us/apx-centurion-combat/
Beretta	APX Centurion RDO	JAXQ92170	NO	https://www.beretta.com/en-us/apx-centurion-rdo/
Beretta	APX Centurion RDO	JAXQ92070	NO	https://www.beretta.com/en-us/apx-centurion-rdo/
Beretta	APX Centurion FDE	JAXQ92005	NO	https://www.beretta.com/en-us/apx-centurion-fde/
Beretta	APX Centurion FDE	JAXQ92105	NO	https://www.beretta.com/en-us/apx-centurion-fde/
Beretta	APX Compact FDE	JAXC92105	NO	https://www.beretta.com/en-us/apx-compact-fde/
Beretta	APX Compact FDE	JAXC92005	NO	https://www.beretta.com/en-us/apx-compact-fde/
Beretta	APX	JAXF421	NO	https://www.beretta.com/en-us/apx-striker/
Beretta	APX	JAXF420	NO	https://www.beretta.com/en-us/apx-striker/
Beretta	APX	JAXF921	NO	https://www.beretta.com/en-us/apx-striker/
Beretta	APX	JAXF920	NO	https://www.beretta.com/en-us/apx-striker/
Beretta	APX Combat	JAXF920701	NO	https://www.beretta.com/en-us/apx-combat/
Beretta	APX Combat	JAXF921701	NO	https://www.beretta.com/en-us/apx-combat/
Beretta	APX RDO	JAXF42170	NO	https://www.beretta.com/en-us/apx-rdo/
Beretta	APX RDO	JAXF42070	NO	https://www.beretta.com/en-us/apx-rdo/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Beretta	APX RDO	JAXF92170	NO	https://www.beretta.com/en-us/apx-rdo/
Beretta	APX RDO	JAXF92070	NO	https://www.beretta.com/en-us/apx-rdo/
Beretta	APX FDE	JAXF92105	NO	https://www.beretta.com/en-us/apx-fde/
Beretta	APX FDE	JAXF91505	NO	https://www.beretta.com/en-us/apx-fde/
Beretta	APX FDE	JAXF92005	NO	https://www.beretta.com/en-us/apx-fde/
Beretta	Alleycat	not available	YES	https://oag.ca.gov/firearms/handgun/3032-alleycat
Beretta	APX Centurion	not available	NO	https://www.beretta.com/en-us/apx-centurion/
Beretta	APX Compact	JAXC420	NO	https://www.beretta.com/en-us/apx-compact/
Beretta	APX Compact	JAXC921	NO	https://www.beretta.com/en-us/apx-compact/
Beretta	APX Compact	JAXC920	NO	https://www.beretta.com/en-us/apx-compact/
Beretta	92G Brigadier Volunteer	SPEC0647A	NO	https://www.beretta.com/en-us/92g-brigadier-volunteer/
Beretta	92FSR_22 Sniper Grey	J90A192FSRF59	NO	https://www.beretta.com/en-us/92fsr-22-sniper-grey/
Beretta	92FSR_22 Sniper Grey	J90A192FSRF58	NO	https://www.beretta.com/en-us/92fsr-22-sniper-grey/
Beretta	M9A1_22	J90A1M9A1F18	NO	https://www.beretta.com/en-us/m9a1-22/
Beretta	M9A1_22	J90A1M9A1F19	NO	https://www.beretta.com/en-us/m9a1-22/
Beretta	21 A Bobcat Inox	212500	NO	https://www.beretta.com/en-us/21-a-bobcat-inox/
Beretta	Pico FDE Frame	JMP8D55	NO	https://www.beretta.com/en-us/pico-fde-frame/
Beretta	Pico RE Blue Frame	JMP8D75	NO	https://www.beretta.com/en-us/pico-re-blue-frame/
Beretta	Nano Sniper Grey Frame	NU150974	NO	https://www.beretta.com/en-us/nano-sniper-grey-frame/
Beretta	Pico Lavender Frame	JMP8D85	NO	https://www.beretta.com/en-us/pico-lavender-frame/
Beretta	Nano RE Blue Frame	NU150973	NO	https://www.beretta.com/en-us/nano-re-blue-frame/
Beretta	Nano Rosa Frame	JMN9S65	NO	https://www.beretta.com/en-us/nano-rosa-frame/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Beretta	Nano FDE Frame	JMN9S55	NO	https://www.beretta.com/en-us/nano-fde-frame/
Beretta	BU9 Nano	JMN9S55	NO	https://www.beretta.com/en-us/bu9-nano/
Beretta	BU9 Nano	JMN9S65	NO	https://www.beretta.com/en-us/bu9-nano/
Beretta	BU9 Nano	JMN9S15	NO	https://www.beretta.com/en-us/bu9-nano/
Beretta	92 A1	J9A9F11FC	NO	https://www.beretta.com/en-us/92-a1/
Beretta	92 A1	J9A9F11	NO	https://www.beretta.com/en-us/92-a1/
Beretta	92 A1	J9A9F10	NO	https://www.beretta.com/en-us/92-a1/
Beretta	Pico	SPEC0612A	NO	https://www.beretta.com/en-us/pico/
Beretta	Pico	JMP8D25FC	NO	https://www.beretta.com/en-us/pico/
Beretta	Pico	JMP8D25	NO	https://www.beretta.com/en-us/pico/
Beretta	M9	J92M9A0FC	NO	https://www.beretta.com/en-us/m9/
Beretta	M9	J92M9A0	NO	https://www.beretta.com/en-us/m9/
Beretta	M9	J92M9A0M	NO	https://www.beretta.com/en-us/m9/
Beretta	92 FS	JS92F300FC	NO	https://www.beretta.com/en-us/92-fs/
Beretta	92 FS	JS92F300	NO	https://www.beretta.com/en-us/92-fs/
Beretta	92 FS	JS92F300M	NO	https://www.beretta.com/en-us/92-fs/
Beretta	21 A Bobcat	J212500	NO	https://www.beretta.com/en-us/21-a-bobcat/
Beretta	3032 Tomcat Inox	J320500	YES	https://www.beretta.com/en-us/3032-tomcat-inox/
Beretta	3032 Tomcat / Blue Steel		YES	https://oag.ca.gov/firearms/handgun/3032-tomcat
Beretta	M9A1	JS92M9A1FC	NO	https://www.beretta.com/en-us/m9a1/
Beretta	M9A1	JS92M9A1	NO	https://www.beretta.com/en-us/m9a1/
Beretta	M9A1	JS92M9A1M	NO	https://www.beretta.com/en-us/m9a1/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Beretta	92 FS Inox	JS92F510FC	NO	https://www.beretta.com/en-us/92-fs-inox/
Beretta	92 FS Inox	JS92F510	NO	https://www.beretta.com/en-us/92-fs-inox/
Beretta	92 FS Inox	JS92F500	NO	https://www.beretta.com/en-us/92-fs-inox/
Beretta	96 A1	J9A4F11FC	YES	https://www.beretta.com/en-us/96-a1/
Beretta	96 A1	J9A4F11	YES	https://www.beretta.com/en-us/96-a1/
Beretta	96 A1	J9A4F10	NO	https://www.beretta.com/en-us/96-a1/
Beretta	92 Compact with Rail Inox	J90C9F20	NO	https://www.beretta.com/en-us/92-compact-with-rail-inox/
Beretta	M9_22LR	J90A1M9F19	NO	https://www.beretta.com/en-us/m9-22lr/
Beretta	M9_22LR	J90A1M9F18	NO	https://www.beretta.com/en-us/m9-22lr/
Beretta	M9A3	J92M9A3GM	NO	https://www.beretta.com/en-us/m9a3/
Beretta	M9A3	J92M9A3G	NO	https://www.beretta.com/en-us/m9a3/
Beretta	M9A3	J92M9A3M	NO	https://www.beretta.com/en-us/m9a3/
Beretta	M9A3	J92M9A3	NO	https://www.beretta.com/en-us/m9a3/
Beretta	92 FS Fusion	not available	NO	https://www.beretta.com/en-us/92-fs-fusion/
Beretta	92 Brigadier Inox	JS92F565M	NO	https://www.beretta.com/en-us/92-brigadier-inox/
Beretta	92 Brigadier Inox	JS92F565	YES	https://www.beretta.com/en-us/92-brigadier-inox/
Beretta	92 Brigadier Inox	J92F560M	NO	https://www.beretta.com/en-us/92-brigadier-inox/
Beretta	92 Brigadier Inox	J92F560	yes	https://www.beretta.com/en-us/92-brigadier-inox/
Beretta	U22 Neos	JU2S60BFC	NO	https://www.beretta.com/en-us/u22-neos/
Beretta	U22 Neos	JU2S60B	NO	https://www.beretta.com/en-us/u22-neos/
Beretta	U22 Neos	JU2S45BFC	NO	https://www.beretta.com/en-us/u22-neos/
Beretta	U22 Neos	JU2S45B	NO	https://www.beretta.com/en-us/u22-neos/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Beretta	U22 Neos Inox	JU2S60XFC	NO	https://www.beretta.com/en-us/u22-neos-inox/
Beretta	U22 Neos Inox	JU2S60X	NO	https://www.beretta.com/en-us/u22-neos-inox/
Beretta	U22 Neos Inox	JU2S45XFC	NO	https://www.beretta.com/en-us/u22-neos-inox/
Beretta	U22 Neos Inox	JU2S45X	NO	https://www.beretta.com/en-us/u22-neos-inox/
Beretta	Px4 Storm Compact	JXC4F20FC	NO	https://www.beretta.com/en-us/px4-storm-compact/
Beretta	Px4 Storm Compact	JXC4F20	NO	https://www.beretta.com/en-us/px4-storm-compact/
Beretta	Px4 Storm Compact	JXC4F21	NO	https://www.beretta.com/en-us/px4-storm-compact/
Beretta	Px4 Storm Compact	JXC9F20FC	NO	https://www.beretta.com/en-us/px4-storm-compact/
Beretta	Px4 Storm Compact	JXC9F20	NO	https://www.beretta.com/en-us/px4-storm-compact/
Beretta	Px4 Storm Compact	JXC9F21	NO	https://www.beretta.com/en-us/px4-storm-compact/
Beretta	92FS / Alloy; Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/92fs
Beretta	92FS Black Inox / Stainless Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/92fs-black-inox
Beretta	92FS Compact Type M / Blue Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/92fs-compact-type-m
Beretta	92FS Inox / Stainless Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/92fs-inox
Beretta	92FS Inox Lasergrips / Stainless Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/92fs-inox
Beretta	92FS OD Green / Alloy; Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/92fs-od-green
Beretta	92FS Type M/A1 / Alloy; Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/92fs-vertec-inox
Beretta	92FS Vertec Inox / Stainless Steel, Alloy	not available	YES	https://oaq.ca.gov/firearms/handgun/92fs-vertec-inox
Beretta	92FS Vertec Inox Lasergrips / Steel, Stainless Steel, Alloy	not available	YES	https://oaq.ca.gov/firearms/handgun/92fs-vertec-inox
Beretta	92FS Vertec Inox Lasergrips	not available	YES	https://oaq.ca.gov/firearms/handgun/92fs-vertec-inox-lasergrips
Beretta	92G Elite A1 / Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/92g-elite-a1
Beretta	92G Elite II J92GE20 / Blue Steel, Stainless Steel	J92GE20	YES	https://oaq.ca.gov/firearms/handgun/92g-elite-ii-j92ge20

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Beretta	92G-SD (Matte Black) J92GSD1	J92GSD1	YES	https://oaq.ca.gov/firearms/handgun/92g-sd-matte-black-92g-sd1
Beretta	96 Brigadier Inox / Stainless Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/96-brigadier
Beretta	96 Inox / Stainless Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/96-inox
Beretta	96 Vertec Inox / Stainless Steel, Alloy	not available	YES	https://oaq.ca.gov/firearms/handgun/96-vertec-inox
Beretta	96G Elite A1 / Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/96g-elite-a1
Beretta	96G Elite II / Blue Steel, Stainless Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/96g-elite-ii
Beretta	96G-SD / Stainless Steel, Alloy	not available	YES	https://oaq.ca.gov/firearms/handgun/96g-sd
Beretta	M9 Commercial / Alloy, Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/m9-commercial
Beretta	PX4 Storm Type G	not available	YES	https://oaq.ca.gov/firearms/handgun/px4-storm-type-g
Beretta	PX4 Storm Type G / Steel, Polymer	not available	YES	https://oaq.ca.gov/firearms/handgun/px4-storm-type-g
Bersa	Thunder 380 Gold	not available	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-gold
Bersa	T380M8 Thunder 380 Matte Finish	16298	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-matte
Bersa	Thunder 22 Duo-Tone Finish	78871	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-22-duo-tone
Bersa	Thunder 380 Flat Dark Earth	not available	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-flat-dark-earth-1236
Bersa	Thunder 380 Matte Finish	16298	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-matte
Bersa	Thunder 380 Matte Finish with Threaded Barrel	111447	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-matte-1456
Bersa	Thunder 22 Matte Black	72191	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-22-matte-1456
Bersa	Thunder 380 Nickel	16360	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-nickel
Bersa	Thunder 380 Duo-Tone Finish	16311	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-duo-tone
Bersa	Thunder 22 Nickel	72192	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-22-nickel
Bersa	Thunder 380 w/ Pink Grip	16307	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-rubbergrip-1122
Bersa	Thunder 380 Duo-Tone (Matte/Nickel) Finish with Crimson Trace Laser Grips	16363	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Bersa	Thunder 380 Purple	46924	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-purple
Bersa	Thunder 380 Pink	46947	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-pink
Bersa	Thunder 380 Blue	46926	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-blue
Bersa	Thunder 380 Matte Finish with Pink Crimson Trace Laser Grips	16364	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-matte-pink
Bersa	Thunder 380 Limited Edition Series Gold Enhanced Parts	not available	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-681
Bersa	Thunder 380 Limited Edition Series Nickel Enhanced Parts	not available	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-680
Bersa	Thunder 380 Duo-Tone (Nickel/Matte) Finish	not available	NO	https://bersa.eagleimportsinc.com/bersa/thunder-790
Bersa	Thunder 380 Matte with Rubber Grip	not available	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380-rubbergrip
Bersa	Thunder 380 Duo-Tone with Rubber Grip	not available	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/thunder-380
Bersa	Fiestom 380	93481	YES	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-series/models/firestom-380
Bersa	Thunder 380 Combat Plus	3824	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-combat-series/models/thunder-380-combat-plus
Bersa	Thunder 380 Combat Plus	78870	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-combat-series/models/thunder-380-combat
Bersa	Thunder 380 Plus Matte Finish	26466	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-plus/models/thunder-380-plus-958
Bersa	Thunder 380 Plus Nickel Finish	58287	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-plus/models/thunder-380-plus-9588
Bersa	Thunder 380 Plus Duo-Tone	not available	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-plus/models/thunder-380-plus-959
Bersa	Thunder 380 CC Satin Nickel Finish	not available	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-concealed-carvy/models/thunder-380-cc-1463
Bersa	Thunder 380 CC Matte Finish with Crimson Trace Grips	96974	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-concealed-carvy/models/thunder-380-cc-crimson-trace
Bersa	Thunder 380 CC Muddy Girl Kit	107901	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-concealed-carvy/models/thunder-380-cc-muddy-girl-kit
Bersa	Thunder 380 CC Duo-Tone (Matte/Nickel) Finish	72190	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-concealed-carvy/models/thunder-380-cc
Bersa	Thunder 380 CC Matte Finish with Crimson Trace Grips	13692	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-concealed-carvy/models/thunder-380-cc-1464
Bersa	BPCC 9MM Matte Finish	59360	NO	https://bersa.eagleimportsinc.com/bersa/firearms/bp-concealed-carvy-series/models/bersa-bpcc9mm-1509
Bersa	BPCC 9MM Flat Dark Earth	3826	NO	https://bersa.eagleimportsinc.com/bersa/firearms/bp-concealed-carvy-series/models/bersa-bpcc9mmfde

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Bersa	BPCC 9MM Urban Grey	3827	NO	https://bersa.eagleimportsinc.com/bersa/firearms/bp-concealed-carry-series/models/bersa-bpcc9mmug
Bersa	BPCC 9MM Full Flat Dark Earth	107900	NO	https://bersa.eagleimportsinc.com/bersa/firearms/bp-concealed-carry-series/models/bersa-bpcc9mmfde-1448
Bersa	BPCC 9MM Matte Finish with Threaded Barrel	111444	NO	https://bersa.eagleimportsinc.com/bersa/firearms/bp-concealed-carry-series/models/bersa-bpcc9mmf-1511
Bersa	BPCC 9MM Duo-Tone	59361	NO	https://bersa.eagleimportsinc.com/bersa/firearms/bp-concealed-carry-series/models/bersa-bpcc9mmf-1508
Bersa	BPCC 9MM Olive Drab	84175	NO	https://bersa.eagleimportsinc.com/bersa/firearms/bp-concealed-carry-series/models/bersa-bpcc9mmf
Bersa	BPCC 380ACP Matte Finish	93480	NO	https://bersa.eagleimportsinc.com/bersa/firearms/bp-concealed-carry-series/models/bersa-bpcc380acp
Bersa	Thunder 22 Matte Black with Threaded Barrel 786 Assault Weapon	785	NO	https://bersa.eagleimportsinc.com/bersa/thunder-786
Bersa	BPCC 380ACP Duo-Tone	3828	NO	https://bersa.eagleimportsinc.com/bersa/firearms/bp-concealed-carry-series/models/bersa-bpcc9mmf-1510
Bersa	BPCC 9MM Turquoise	not available	NO	https://bersa.eagleimportsinc.com/bersa/firearms/bp-concealed-carry-series/models/bersa-bpcc9mmug-1260
Bersa	BPCC 9MM Turquoise Duotone	not available	NO	https://bersa.eagleimportsinc.com/bersa/firearms/bp-concealed-carry-series/models/bersa-bpcc9mmug-1261
Bersa	TPR9 Duotone	46535	NO	https://bersa.eagleimportsinc.com/bersa/firearms/tp-series/models/tp-9-duotone
Bersa	TPR9 Matte	46534	NO	https://bersa.eagleimportsinc.com/bersa/firearms/tp-series/models/tp-9-matte
Bersa	TPR9 Matte with Threaded Barrel	111445	NO	https://bersa.eagleimportsinc.com/bersa/firearms/tp-series/models/tp-9-matte
Bersa	TPR40C	46507	NO	https://bersa.eagleimportsinc.com/bersa/firearms/tpc-series/models/tp-40c
Bersa	TPR45C Duotone	46531	NO	https://bersa.eagleimportsinc.com/bersa/firearms/tpc-series/models/tp-45c-duotone
Bersa	TPR45C Matte	46530	NO	https://bersa.eagleimportsinc.com/bersa/firearms/tpc-series/models/tp-45c-matte
Bersa	TPR9C Duotone	46506	NO	https://bersa.eagleimportsinc.com/bersa/firearms/tpc-series/models/tp-9c-duotone
Bersa	TPR9C Matte	46503	NO	https://bersa.eagleimportsinc.com/bersa/firearms/tpc-series/models/tp-9c-matte
Bersa	TPR9C Matte with Threaded Barrel	111446	NO	https://bersa.eagleimportsinc.com/bersa/firearms/tpc-series/models/tp-9c-matte-1461
Bersa	BPCC 9MM Matte Finish with Threaded Barrel	111444	NO	https://bersa.eagleimportsinc.com/bersa/firearms/threaded-barrels/models/bersa-bpcc9mmf
Bersa	Thunder 9 Pro XT	3825	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-xt-series/models/thunder-9-pro-xt
Bersa	Thunder 9 Pro XT Matte	24495	NO	https://bersa.eagleimportsinc.com/bersa/firearms/thunder-xt-series/models/thunder-9-pro-xt-matte

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or example)?	LINK TO PRODUCT
Bersa	BPCC 380ACP Duo-Tone		NO	https://bersa.eagleimportsinc.com/bersa/firearms/disc-models/models/bersabpc38mm-1121
Browning	1911-22 A1 Full Size(Blk) Plastic Grips / Alloy	not available	YES	https://oaq.ca.gov/firearms/handgun/1911-22-a1-full-size-blk-plastic-grips
Browning	Buck Mark - Medallion Rosewood	51543490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-medallion-rosewood.html
Browning	1911-22 A1 Gray FS,S,22 Alloy	51879490	YES	https://oaq.ca.gov/firearms/handgun/1911-22-a1-gray-fs22-051879490
Browning	Buck Mark Plus Camper UFX Suppressor Ready	51534490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-plus-camper-ufx-suppressor-ready.html
Browning	Buck Mark Plus Lite Flute UFX Suppressor Ready	51536490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-plus-lite-flute-ufx-suppressor-ready.html
Browning	Buck Mark Plus Stainless UDX	51531490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-plus-stainless-udx.html
Browning	Buck Mark Plus Rosewood UDX	51533490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-plus-rosewood-udx.html
Browning	Buck Mark Plus UDX	51532490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-plus-udx.html
Browning	Buck Mark Plus Practical URX	51530490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-plus-practical-urx.html
Browning	Buck Mark Lite UFX	51525490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-lite-ufx.html
Browning	Buck Mark Field Target	51528490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-field-target.html
Browning	Buck Mark Field Target Suppressor Ready	51527490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-field-target-suppressor-ready.html
Browning	Buck Mark Lite Gray URX 5 1/2	51500490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-lite-gray-urx-5.html
Browning	Buck Mark Lite Gray URX 7 1/4" Barrel	51517490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-lite-gray-urx-7-inch-barrel.html
Browning	Buck Mark Lite Green URX	51459490	YES	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-lite-green-urx.html
Browning	Buck Mark Challenge Rosewood	51519490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-challenge-rosewood.html
Browning	Buck Mark MS NS Practical URX F/O	51448490	YES	https://oaq.ca.gov/firearms/handgun/buck-mark-ms-ns-practical-urx-fo-051448490
Browning	Buck Mark Micro Standard URX SE MS	51408490	NO	https://oaq.ca.gov/firearms/handgun/buck-mark-micro-standard-urx-se-ms-051408490
Browning	Hi-Power MKIII Fixed Sights	51001393	YES	https://oaq.ca.gov/firearms/handgun/hi-power-mkiii-fixed-sights-051001393
Browning	Buck Mark Lt Grey 7.25 FLT URX F/O SE MS	51462490	YES	https://oaq.ca.gov/firearms/handgun/buck-mark-lt-grey-725-flt-urx-fo-se-ms-051462490
Browning	Hi-Power Blue Fixed Sights	51003393	YES	https://oaq.ca.gov/firearms/handgun/hi-power-blue-fixed-sights-051003393

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Browning	Buck Mark Plus Rewd UDX MS SE Adj, Sghts	51429490	YES	https://oaq.ca.gov/firearms/handgun/buck-mark-plus-rewd-udx-ms-se-adj-sghts-051429490
Browning	Buck Mark Plus Brown LAM UDX SE MS	51428490	YES	https://oaq.ca.gov/firearms/handgun/buck-mark-plus-brown-lam-udx-se-ms-051428490
Browning	Buck Mark Plus SS Black LAM UDX MS	51427490	YES	https://oaq.ca.gov/firearms/handgun/buck-mark-plus-ss-black-lam-udx-ms-051427490
Browning	Buck Mark Standard SS URX MS	51409490	YES	https://oaq.ca.gov/firearms/handgun/buck-mark-standard-ss-urx-ms-051409490
Browning	Hi-Power Blue Adj Sights	51003493	YES	https://oaq.ca.gov/firearms/handgun/hi-power-blue-adj-sights-051003493
Browning	Buck Mark Standard URX SE MS	51407490	YES	https://oaq.ca.gov/firearms/handgun/buck-mark-standard-urx-se-ms-051407490
Browning	Buck Mark Camper UFX	51498490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-camper-ufx.html
Browning	Buck Mark Camper UFX, Adj, Sights	51482490	YES	https://oaq.ca.gov/firearms/handgun/buck-mark-camper-ufx-adj-sights-051482490
Browning	Buck Mark Standard URX	51497490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-standard-urx.html
Browning	Buck Mark Camper Stainless URX	51442490	YES	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-camper-stainless-urx.html
Browning	Buck Mark Standard Micro URX	51514490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-standard-micro-urx.html
Browning	Buck Mark Contour Stainless URX, 5 1/2	51507490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-contour-stainless-urx-5.html
Browning	Buck Mark Contour Stainless URX, 7 1/4	51508490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-contour-stainless-urx-7.html
Browning	Buck Mark Contour URX, 5-1/2"	51501490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-contour-urx-5.html
Browning	Buck Mark Contour URX, 7-1/4" Barrel	51502490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-contour-urx-7.html
Browning	Buck Mark Hunter	51499490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/current-production/buck-mark-hunter.html
Browning	Buck Mark Plus Micro Bull Suppressor Ready	51556490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-plus-micro-bull-suppressor-ready.html
Browning	Buck Mark Plus Speed	51557490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-plus-speed.html
Browning	Buck Mark Lite Competition Suppressor Ready Red Dot	51558490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-lite-competition-suppressor-ready-red-dot.html
Browning	Buck Mark Competition Suppressor Ready Red Dot	51559490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-competition-suppressor-ready-red-dot.html
Browning	Buck Mark Plus FDE Suppressor Ready	51560490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-plus-flat-dark-earth-suppressor-ready.html
Browning	Buck Mark Plus Vision Black	51561490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-plus-vision-black.html

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Browning	Buck Mark Plus Vision Blue	51562490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-plus-vision-blue.html
Browning	Buck Mark Plus Vision Red	51563490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-plus-vision-red.html
Browning	Buck Mark Contour 5.5	51564490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-contour-5-5.html
Browning	Buck Mark Micro Bull	51537490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-micro-bull.html
Browning	Buck Mark Field/Target Micro	51538490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-field-target-micro.html
Browning	Buck Mark Black Label Suppressor Ready Laser	51552490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-black-label-suppressor-ready-laser.html
Browning	Buck Mark Medallion	51543490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-medallion.html
Browning	Buck Mark Plus Camper Suppressor Ready	51534490	NO	https://www.browning.com/products/firearms/pistols/buck-mark-pistols/limited-availability/buck-mark-plus-camper-suppressor-ready.html
Browning	BM CNTR GRAY 5.5 URX,S,22/ Alloy; Steel	51564490	YES	https://oag.ca.gov/firearms/handgun/bm-cntr-gray-55-urx-s-22-051564490
Browning	Buck Mark Camper Stinis UFX, Adj. Sgt	51483490	YES	https://oag.ca.gov/firearms/handgun/buck-mark-camper-stinis-ufx-adj-sgt-051483490
Browning	Buck Mark Lite Grey 5.5 FLT URX 051461490F/O SE MS	51461490F	YES	https://oag.ca.gov/firearms/handgun/buck-mark-lite-grey-55-flt-urx-051461490fo-se-ms
Browning	1911-22 Compact Plastic Grips / Alloy	not available	YES	https://oag.ca.gov/firearms/handgun/1911-22-compact-plastic-grips
Browning	Buck Mark Contour 5.5 URX SE MS	51421490	YES	https://oag.ca.gov/firearms/handgun/buck-mark-contour-55-urx-se-ms-051421490
Browning	1911-22 A1 Full Size	51802490	YES	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-a1.html
Browning	1911-22 A1 Compact	51803490	YES	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-a1-compact.html
Browning	1911-22 Black Label Medallion Full Size	51851490	NO	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-black-label-medallion-full-size.html
Browning	1911-22 Black Label Medallion Compact	51852490	NO	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-black-label-medallion-compact.html
Browning	1911-22 Black Label Gray	51847490	NO	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-black-label-gray-full-size.html
Browning	1911-22 Black Label Gray with Rail	51848490	NO	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-black-label-gray-full-size-with-rail.html
Browning	1911-22 Black Label Gray Compact	51849490	YES	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-black-label-gray-compact.html
Browning	1911-22 Black Label Gray Compact with Rail	51850490	NO	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-black-label-gray-compact-with-rail.html
Browning	1911-22 Black Label Full Size Suppressor Ready with Rail	51820490	NO	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-black-label-suppressor-ready-rail.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Browning	1911-22 Black Label Compact Suppressor Ready with Rail	51821490	NO	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-black-label-suppressor-ready-with-compact.html
Browning	1911-22 Black Label Full Size	51814490	NO	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-a1-black-label-laminate.html
Browning	1911-22 Black Label Full Size with Rail	51816490	NO	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-black-label-with-rail.html
Browning	1911-22 Black Label Compact	51815490	NO	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-black-label-laminate-compact.html
Browning	1911-22 Black Label Compact with Rail	51817490	NO	https://www.browning.com/products/firearms/pistols/1911-22/current-production/1911-22-black-label-laminate-compact-rail.html
Browning	1911-22 Flat Dark Earth/FDE Compact	51881490	NO	https://www.browning.com/products/firearms/pistols/1911-22/limited-availability/1911-22-flat-dark-earth.html
Browning	1911-22 Speed/Speed Compact	51887490	NO	https://www.browning.com/products/firearms/pistols/1911-22/limited-availability/1911-22-speed.html
Browning	1911-22 Red/Red Compact	51883490	NO	https://www.browning.com/products/firearms/pistols/1911-22/limited-availability/1911-22-red.html
Browning	1911-22 Blue/Blue Compact	51885490	NO	https://www.browning.com/products/firearms/pistols/1911-22/limited-availability/1911-22-blue.html
Browning	1911-22 Gray Full Size/Compact	51879490	YES	https://www.browning.com/products/firearms/pistols/1911-22/limited-availability/1911-22-a1-gray.html
Browning	1911-380 Black Label Pro Stainless Compact	51924492	NO	https://www.browning.com/products/firearms/pistols/1911-380/current-production/black-label-pro-stainless-compact.html
Browning	1911-380 Black Label Pro Stainless Compact with Rail	51925492	NO	https://www.browning.com/products/firearms/pistols/1911-380/current-production/black-label-pro-stainless-compact-rail.html
Browning	1911-380 Black Label Pro Stainless Full Size	51922492	NO	https://www.browning.com/products/firearms/pistols/1911-380/current-production/black-label-pro-stainless-full-size.html
Browning	1911-380 Black Label Pro Stainless Full Size with Rail	51923492	NO	https://www.browning.com/products/firearms/pistols/1911-380/current-production/black-label-pro-stainless-full-size-rail.html
Browning	1911-380 Black Label Pro	51900492	NO	https://www.browning.com/products/firearms/pistols/1911-380/current-production/black-label-1911-380-pro-full-size.html
Browning	1911-380 Black Label Pro w/Rail	51901492	NO	https://www.browning.com/products/firearms/pistols/1911-380/current-production/black-label-1911-380-pro-full-size-with-rail.html
Browning	1911-380 Black Label Pro Compact	51908492	NO	https://www.browning.com/products/firearms/pistols/1911-380/current-production/black-label-1911-380-pro-compact.html
Browning	1911-380 Black Label Pro Compact 3-Dot with Rail	51909492	NO	https://www.browning.com/products/firearms/pistols/1911-380/current-production/black-label-1911-380-pro-compact-with-rail.html
Browning	1911-380 Black Label Medallion Pro	51912492	NO	https://www.browning.com/products/firearms/pistols/1911-380/current-production/1911-380-black-label-medallion-pro-full-size.html
Browning	1911-380 Black Label Medallion Pro Compact	51913492	NO	https://www.browning.com/products/firearms/pistols/1911-380/current-production/1911-380-black-label-medallion-pro-compact.html
Browning	1911-380 Black Label Full Size	51904492	NO	https://www.browning.com/products/firearms/pistols/1911-380/current-production/black-label-1911-380-full-size.html
Browning	1911-380 Black Label Compact	51905492	NO	https://www.browning.com/products/firearms/pistols/1911-380/current-production/black-label-1911-380-compact.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Browning	1911-380 High Grade/High Grade Compact	51964492	NO	https://www.browning.com/products/firearms/pistols/1911-380/limited-availability/1911-380-high-grade.html
Browning	1911-380 Speed/Speed Compact	51962492	NO	https://www.browning.com/products/firearms/pistols/1911-380/limited-availability/1911-380-speed.html
Browning	1911-380 Medallion Stainless Engraved/Compact	51966492	NO	https://www.browning.com/products/firearms/pistols/1911-380/limited-availability/1911-380-medallion-stainless-engraved-compact.html
Browning	1911-380 Flat Dark Earth/Compact	51960492	NO	https://www.browning.com/products/firearms/pistols/1911-380/limited-availability/1911-380-flat-dark-earth-compact.html
Browning	1911-380 Black Label Medallion Logo Grips	51950492	NO	https://www.browning.com/products/firearms/pistols/1911-380/limited-availability/1911-380-black-label-medallion-logo-grips.html
Browning	1911-380 Black Label Medallion Laser	51952492	NO	https://www.browning.com/products/firearms/pistols/1911-380/limited-availability/1911-380-black-label-medallion-laser.html
Canik USA	TP9 Elite Combat	HG6481D	NO	https://www.canikusa.com/tp9-elite-combat
Canik USA	TP9 Elite Combat Executive	HG4950-N	NO	https://www.canikusa.com/tp9-elite-combat-executive
Canik USA	TP9 Elite Combat Executive With Vortex Viper Red Dot	HG4950V-N	NO	https://www.canikusa.com/tp9-elite-combat-executive-w-viper-optic
Canik USA	TP9 Elite Combat with Vortex Viper Red Dot	HG6481DV-N	NO	https://www.canikusa.com/tp9-elite-combat-w-vortex-viper-sight-fde
Christensen Arms	A6-TR	Not available	NO	https://christensenarms.com/a-series/
Christensen Arms	G5-TR	Not available	NO	https://christensenarms.com/g5/
CZ	CZ AccuShadow 2	91763	NO	https://cz-usa.com/product/cz-accushadow-2-cz-custom-shop/
CZ	40 B (Black)	1700	YES	https://oaq.ca.gov/firearms/handgun/40-b-black-01700
CZ	CZ P-10 C	91531	NO	https://cz-usa.com/product/cz-p-10-c/
CZ	CZ P-10 C	0 1531	NO	https://cz-usa.com/product/cz-p-10-c/
CZ	CZ P-10 C Urban Grey Suppressor-Ready	91534	NO	https://cz-usa.com/product/cz-p-10-c-urban-grey-suppressor-ready/
CZ	CZ 97 B (Black) Steel	1401	YES	https://oaq.ca.gov/firearms/handgun/cz-97-b-black-01401
CZ	CZ 75 TS Steel, Alloy, Poly Trigger	1172	YES	https://oaq.ca.gov/firearms/handgun/cz-75-ts-01172
CZ	CZ P-10 C Urban Grey Suppressor-Ready	0 1534	NO	https://cz-usa.com/product/cz-p-10-c-urban-grey-suppressor-ready/
CZ	CZ P-10 F	91540	NO	https://cz-usa.com/product/cz-p-10-f/
CZ	CZ P-10 F	0 1540	NO	https://cz-usa.com/product/cz-p-10-f/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
CZ	CZ P-10 F FDE	91541	NO	https://cz-usa.com/product/cz-p-10-f-fde/
CZ	CZ P-10 F FDE	1541	NO	https://cz-usa.com/product/cz-p-10-f-fde/
CZ	CZ P-10 F OD Green	91545	NO	https://cz-usa.com/product/cz-p-10-f-od-green/
CZ	CZ P-10 F OD Green	0 1545	NO	https://cz-usa.com/product/cz-p-10-f-od-green/
CZ	CZ P-10 F Suppressor-Ready	91543	NO	https://cz-usa.com/product/cz-p-10-f-suppressor-ready/
CZ	CZ P-10 F Suppressor-Ready	0 1543	NO	https://cz-usa.com/product/cz-p-10-f-suppressor-ready/
CZ	CZ P-10 F Urban Grey Suppressor-Ready	91544	NO	https://cz-usa.com/product/cz-p-10-f-urban-grey-suppressor-ready/
CZ	CZ P-10 F Urban Grey Suppressor-Ready	0 1544	NO	https://cz-usa.com/product/cz-p-10-f-urban-grey-suppressor-ready/
CZ	CZ Shadow 2 Black & Blue	91257	NO	https://cz-usa.com/product/cz-shadow-2-black-blue/
CZ	CZ Shadow 2 Optics-Ready	91251	NO	https://cz-usa.com/product/cz-shadow-2-opt/
CZ	CZ Shadow 2 Orange	91249	NO	https://cz-usa.com/product/cz-shadow-2-orange/
CZ	CZ Shadow 2 SA	91245	NO	https://cz-usa.com/product/cz-shadow-2-sa/
CZ	CZ Shadow 2 Urban Grey	91255	NO	https://cz-usa.com/product/cz-shadow-2-urban-grey/
CZ	CZ-USA P-10 C Optics-Ready	95130	NO	https://cz-usa.com/product/cz-usa-p-10-c-optics-ready/
CZ	CZ-USA P-10 C Optics-Ready	0 5130	NO	https://cz-usa.com/product/cz-usa-p-10-c-optics-ready/
CZ	CZ-USA P-10 F Optics-Ready	95150	NO	https://cz-usa.com/product/cz-usa-p-10-f-optics-ready/
CZ	CZ-USA P-10 F Optics-Ready	0 5150	NO	https://cz-usa.com/product/cz-usa-p-10-f-optics-ready/
CZ	CZ-USA P-10 S	95160	NO	https://cz-usa.com/product/cz-usa-p-10-s/
CZ	CZ-USA P-10 S Optics-Ready	95170	NO	https://cz-usa.com/product/cz-usa-p-10-s-optics-ready/
CZ	CZ-USA P-10 S Optics-Ready	0 5170	NO	https://cz-usa.com/product/cz-usa-p-10-s-optics-ready/
CZ	CZC A01-LD	91731	NO	https://cz-usa.com/product/czc-a01-ld/
CZ	Valor Stainless	0 1824	NO	https://danwessonfirearms.com/product/valor-2/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
CZ	Valor Black	0 1823	NO	https://danwessonfirearms.com/product/valor-2/
CZ	DWX C 9MM RAIL	92101	NO	https://danwessonfirearms.com/product/dwx-compact/
CZ	DWX C 9MM RAIL 10RD	92111	NO	https://danwessonfirearms.com/product/dwx-compact/
CZ	DWX C 9MM	92112	NO	https://danwessonfirearms.com/product/dwx-compact/
CZ	75 BD	1130	YES	https://oag.ca.gov/firearms/handgun/75-bd-black-01130
CZ	CZ 75 B	91102	NO	https://cz-usa.com/product/cz-75-b-9mm-black-16-rd-mag/
CZ	CZ 75 B – 9mm (low capacity)	0 1102	YES	https://cz-usa.com/product/cz-75-b-9mm-black-16-rd-mag/
CZ	CZ 75 B 45th Anniversary	91137	NO	https://cz-usa.com/product/cz-75-b-45th-anniversary/
CZ	CZ P-07	91086	NO	https://cz-usa.com/product/cz-p-07-9mm-black-polymer-interchangeable-back-straps-15-rd-mags/
CZ	CZ P-07 – 9mm (low capacity)	0 1086	NO	https://cz-usa.com/product/cz-p-07-9mm-black-polymer-interchangeable-back-straps-15-rd-mags/
CZ	CZ P-07 OD Green	91077	NO	https://cz-usa.com/product/cz-p-07-od-green/
CZ	CZ P-07 OD Green – 9mm (low capacity)	0 1077	NO	https://cz-usa.com/product/cz-p-07-od-green/
CZ	CZ P-07 Suppressor-Ready	91289	NO	https://cz-usa.com/product/cz-p-07-suppressor-ready/
CZ	CZ P-07 Urban Grey Suppressor-Ready	91288	NO	https://cz-usa.com/product/cz-p-07-urban-grey-suppressor-ready/
CZ	CZ 75 B (Black)	1120	YES	https://oag.ca.gov/firearms/handgun/cz-75-b-black-01120
CZ	CZ P-07 Urban Grey Suppressor-Ready (Low Capacity)	0 1288	NO	https://cz-usa.com/product/cz-p-07-urban-grey-suppressor-ready/
CZ	CZ 75 B Ω Urban Grey Suppressor-Ready (Omega)	91235	NO	https://cz-usa.com/product/cz-75-b-%cf%89-urban-grey-suppressor-ready-omega/
CZ	CZ 75 B Ω Urban Grey Suppressor-Ready (Omega) (low capacity)	0 1235	NO	https://cz-usa.com/product/cz-75-b-%cf%89-urban-grey-suppressor-ready-omega/
CZ	CZ 75 B SA (Black) / Steel	1150	YES	https://oag.ca.gov/firearms/handgun/cz-75-b-sa-black-01150
CZ	CZ 75 SP-01	91152	NO	https://cz-usa.com/product/cz-75-sp-01-9mm-black-3-dot-tritium-sights-18-rd-mags/
CZ	CZ 75 SP-01 – 9mm (low capacity)	1152	YES	https://cz-usa.com/product/cz-75-sp-01-9mm-black-3-dot-tritium-sights-18-rd-mags/
CZ	CZ 75 SP-01 Tactical	91153	NO	https://cz-usa.com/product/cz-75-sp-01-tactical-9mm-black-3-dot-tritium-sights-18-rd-mags/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
CZ	CZ 75 SP-01 Tactical – 9mm (low capacity)	0 1153	NO	https://cz-usa.com/product/cz-75-sp-01-tactical-9mm-black-3-dot-tritium-sights-18-rd-mags/
CZ	CZ 75 SP-01 Shadow Target II	91760	NO	https://cz-usa.com/product/cz-75-sp-01-shadow-target-ii-9mm-cz-custom/
CZ	CZ 75 B Ω Convertible (Omega)	91136	NO	https://cz-usa.com/product/cz-75-b-%cf%89-convertible-omega/
CZ	CZ 75 B Ω Convertible (Omega) – 9mm (low capacity)	1136	NO	https://cz-usa.com/product/cz-75-b-%cf%89-convertible-omega/
CZ	75 Compact 01197 / Steel	1197	YES	https://oag.ca.gov/firearms/handgun/75-compact-01197
CZ	75 SA (Black) / Steel	1151	YES	https://oag.ca.gov/firearms/handgun/75-sa-black-01151
CZ	83 (Glossy Blue) / Steel	1301	YES	https://oag.ca.gov/firearms/handgun/83-glossy-blue-01301
CZ	CZ 75 TS Czechmate - 9mm	91174	NO	https://cz-usa.com/product/cz-75-ts-czechmate-9mm-black-2x2-0-rd-1-x26-rd-mags/
CZ	CZ 75 Compact	91190	NO	https://cz-usa.com/product/cz-75-compact-9mm-black-14-rd-mags/
CZ	CZ 75 Compact – 9mm (low capacity)	0 1190	YES	https://cz-usa.com/product/cz-75-compact-9mm-black-14-rd-mags/
CZ	CZ 75 D PCR Compact	91114	NO	https://cz-usa.com/product/cz-75-d-pcr-compact-black-alloy-9mm-14-rd-mags/
CZ	CZ 75 D (Black)	1194	YES	https://oag.ca.gov/firearms/handgun/cz-75-d-black-01194
CZ	CZ 75 PCR – 9mm (low capacity)	1114	NO	https://cz-usa.com/product/cz-75-d-pcr-compact-black-alloy-9mm-14-rd-mags/
CZ	CZ P-01	91199	NO	https://cz-usa.com/product/cz-p-01-9mm-black-alloy-14-rd-mags/
CZ	CZ P-01 – 9mm (low capacity)	1199	YES	https://cz-usa.com/product/cz-p-01-9mm-black-alloy-14-rd-mags/
CZ	CZ P-01 Ω Convertible (Omega)	91229	NO	https://cz-usa.com/product/cz-p-01-%cf%89-convertible-omega/
CZ	CZ P-01 Ω Convertible (Omega) (low capacity)	0 1229	NO	https://cz-usa.com/product/cz-p-01-%cf%89-convertible-omega/
CZ	CZ 75 SP-01 Tactical Urban Grey Suppressor-Ready	91253	NO	https://cz-usa.com/product/cz-75-sp-01-tactical-urban-grey-suppressor-ready/
CZ	CZ 75 SP-01 Tactical Urban Grey Suppressor-Ready (low capacity)	0 1253	NO	https://cz-usa.com/product/cz-75-sp-01-tactical-urban-grey-suppressor-ready/
CZ	CZ 75 Tactical Sport Orange – 9mm (low capacity)	91261	NO	https://cz-usa.com/product/cz-75-tactical-sport-orange/
CZ	CZ 75 Tactical Sport Orange – 9mm (low capacity)	0 1261	NO	https://cz-usa.com/product/cz-75-tactical-sport-orange/
CZ	CZ 75 Tactical Sport Orange – .40 S&W	91260	NO	https://cz-usa.com/product/cz-75-tactical-sport-orange/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
CZ	CZ 75 Tactical Sport Orange -- .40 S&W (low capacity)	0 1260	NO	https://cz-usa.com/product/cz-75-tactical-sport-orange/
CZ	CZ P-09 Urban Grey Suppressor-Ready	91269	NO	https://cz-usa.com/product/cz-p-09-urban-grey-suppressor-ready/
CZ	CZ P-01 Ω Urban Grey Suppressor-Ready (Omega)	91299	NO	https://cz-usa.com/product/cz-p-01-%cf%89-urban-grey-suppressor-ready-omega/
CZ	CZ P-01 Ω Urban Grey Suppressor-Ready (Omega) (low capacity)	0 1299	NO	https://cz-usa.com/product/cz-p-01-%cf%89-urban-grey-suppressor-ready-omega/
CZ	CZ P-09	91620	NO	https://cz-usa.com/product/cz-p-09-9mm-black-polymer-19-rd-mags/
CZ	CZ P-09 -- 9mm (low capacity)	0 1620	NO	https://cz-usa.com/product/cz-p-09-9mm-black-polymer-19-rd-mags/
CZ	CZ 75 Tactical Steel	1100	YES	https://oag.ca.gov/firearms/handgun/cz-75-tactical-01100
CZ	CZ P-09 OD Green	91268	NO	https://cz-usa.com/product/cz-p-09-od-green/
CZ	CZ P-09 OD Green -- 9mm (low capacity)	0 1268	NO	https://cz-usa.com/product/cz-p-09-od-green/
CZ	CZ P-09 Suppressor-Ready	91270	NO	https://cz-usa.com/product/cz-p-09-suppressor-ready/
CZ	CZ P-10 C Suppressor-Ready	91533	NO	https://cz-usa.com/product/cz-p-10-c-suppressor-ready/
CZ	CZ 2075 RAMI	91750	NO	https://cz-usa.com/product/cz-2075-rami-9mm-black-alloy-14-rd-mags/
CZ	CZ 2075 RAMI B -- 9mm (low capacity)	0 1750	NO	https://cz-usa.com/product/cz-2075-rami-9mm-black-alloy-14-rd-mags/
CZ	CZ 2075 RAMI BD	91754	NO	https://cz-usa.com/product/cz-2075-rami-bd-9mm-black-alloy-3-dot-titanium-sights-14-rd-mags/
CZ	CZ 2075 RAMI BD -- 9mm (low capacity)	1754	NO	https://cz-usa.com/product/cz-2075-rami-bd-9mm-black-alloy-3-dot-titanium-sights-14-rd-mags/
CZ	CZ 75 TS Steel, Alloy, Poly Trigger	1171	NO	https://oag.ca.gov/firearms/handgun/cz-75-ts-01171
CZ	CZ 97 B	0 1411	NO	https://cz-usa.com/product/cz-97-b-45-agg-black-aluminum-grips-fo-front-sight-10-rd-mags/
CZ	CZ 97 BD	0 1416	NO	https://cz-usa.com/product/cz-97-bd-45-agg-black-aluminum-grips-3-dot-titanium-night-sights-10-rd-mags/
Charles Daly	1911 FIELD GRADE PISTOL (BLUED)45ACP/5"BBL	440.111	NO	https://www.charlesdaly.com/product.php?id=678
Charles Daly	1911 EMPIRE GRADE PISTOL (BLUED) 9MM/5"BBL	440.072	NO	https://www.charlesdaly.com/product.php?id=431
Charles Daly	1911 EMPIRE GRADE PISTOL (BLUED) 9MM/5"BBL	440.074	NO	https://www.charlesdaly.com/product.php?id=432
Charles Daly	1911 SUPERIOR GRADE PISTOL (BLUED) 45ACP/5"BBL	440.073	NO	https://www.charlesdaly.com/product.php?id=433

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Charles Daly	1911 SUPERIOR GRADE PISTOL (BLUED) 9MM/5"BBL	440.077	NO	https://www.charlesdaly.com/product.php?id=434
Charter Arms	13520 Mag Pug / Alloy	13520	YES	https://oag.ca.gov/firearms/handgun/13520-mag-pug
Charter Arms	Blackniride+	63270	NO	https://charterfirearms.com/collections/mitride/products/model-63270
Charter Arms	Blackniride+	63820	NO	https://charterfirearms.com/collections/mitride/products/63820-undercover-niride-finish
Charter Arms	Blackniride+	64020	NO	https://charterfirearms.com/collections/mitride/products/64020-40-pitbull-niride-finish
Charter Arms	Blackniride+	64420	NO	https://charterfirearms.com/collections/mitride/products/64420-44-special-bulldog-niride-finish
Charter Arms	Blackniride+	64520	NO	https://charterfirearms.com/collections/mitride/products/64520-pitbull-45-cp-niride-finish
Charter Arms	Blackniride+	69920	NO	https://charterfirearms.com/collections/mitride/products/69920-9-mm-pitbull-niride-finish
Charter Arms	Pathfinder	52329	NO	https://charterfirearms.com/collections/pathfinder/products/52329-22-mag-pathfinder-11e
Charter Arms	Pathfinder	52330	NO	https://charterfirearms.com/collections/pathfinder/products/52330-22-mag-pathfinder-11e-pink
Charter Arms	Pathfinder	52370	NO	https://charterfirearms.com/collections/pathfinder/products/52370-22-mag-pathfinder-11e-black-and-slateless
Charter Arms	Pathfinder	72224	NO	https://charterfirearms.com/collections/pathfinder/products/72224-pathfinder-22-ir
Charter Arms	Pathfinder	72242	YES	https://charterfirearms.com/collections/pathfinder/products/72242-22-ir-target-pathfinder-with-4-2-barrel
Charter Arms	Pathfinder	72324	NO	https://charterfirearms.com/collections/pathfinder/products/72324-pathfinder-22-mag
Charter Arms	Pathfinder	72342	NO	https://charterfirearms.com/collections/pathfinder/products/72342-22-magnum-target-pathfinder-with-4-2-barrel
Charter Arms	Pathfinder	72342	NO	https://charterfirearms.com/collections/pathfinder/products/72342-22-magnum-target-pathfinder-with-4-2-barrel
Charter Arms	Undercover	13811	NO	https://charterfirearms.com/collections/undercover/products/13811-undercover-blue-dao
Charter Arms	Undercover	13820	YES	https://charterfirearms.com/collections/undercover/products/13820-undercover-blue-standard
Charter Arms	Undercover	13825	YES	https://charterfirearms.com/collections/undercover/products/13825-undercover-tiger-finer-black-standard
Charter Arms	Undercover	23830	NO	https://charterfirearms.com/collections/undercover/products/23830-the-qator
Charter Arms	Undercover	23872	NO	https://charterfirearms.com/collections/undercover/products/23872-the-old-gloxy
Charter Arms	Undercover	63820	NO	https://charterfirearms.com/collections/undercover/products/63820-undercover-niride-finish

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Charter Arms	Undercover	73811	NO	https://charterfirearms.com/collections/undercover/products/73811-undercover-stainless-dao
Charter Arms	Undercover	73820	YES	https://charterfirearms.com/collections/undercover/products/73820-undercover-stainless-std
Charter Arms	Undercover	73824	NO	https://charterfirearms.com/collections/undercover/products/73824-crimson-undercover
Charter Arms	Undercover	73840	NO	https://charterfirearms.com/collections/undercover/products/73840-police-undercover
Charter Arms	Undercover Lite	53820	YES	https://charterfirearms.com/collections/undercover-lite/products/53820-undercover-lite-standard
Charter Arms	Undercover Lite	53823	YES	https://charterfirearms.com/collections/undercover-lite/products/53823-undercover-lite-red-stainless-standard
Charter Arms	Undercover Lite	53824	NO	https://charterfirearms.com/collections/undercover-lite/products/53824-undercover-lite-red-black-standard
Charter Arms	Undercover Lite	53830	NO	https://charterfirearms.com/collections/undercover-lite/products/53830-pink-lady-undercover-lite-pink-stainless-standard
Charter Arms	Undercover Lite	53831	NO	https://charterfirearms.com/collections/undercover-lite/products/53831-pink-lady-dao
Charter Arms	Undercover Lite (Red/Blk) Std / Aluminum, Stainless Steel	53824	YES	https://oag.ca.gov/firearms/handgun/53824-undercover-lite-red-blk-std
Charter Arms	Undercover Lite	53835	YES	https://charterfirearms.com/collections/undercover-lite/products/53835-pink-black-undercover-lite
Charter Arms	Undercover Lite	53840	YES	https://charterfirearms.com/collections/undercover-lite/products/53840-le-vender-lady
Charter Arms	The Pink Lady	53830	YES	https://oag.ca.gov/firearms/handgun/53830-pink-lady
Charter Arms	Undercover Lite	53841	NO	https://charterfirearms.com/collections/undercover-lite/products/53841-le-vender-lady-dao
Charter Arms	Undercover Lite	53844	YES	https://charterfirearms.com/collections/undercover-lite/products/53844-shamrock-undercover-lite-green-black-standard
Charter Arms	Undercover Lite	53845	NO	https://charterfirearms.com/collections/undercover-lite/products/53845-shamrock-undercover-lite
Charter Arms	Undercover Lite	53848	NO	https://charterfirearms.com/collections/undercover-lite/products/53848-le-vender-lady-black
Charter Arms	Undercover Lite	53859	NO	https://charterfirearms.com/collections/undercover-lite/products/53859-rosebud-undercover-lite
Charter Arms	Undercover Lite	53860	YES	https://charterfirearms.com/collections/undercover-lite/products/53860-santa-fe-undercover-lite-turquoise-stainless-standard
Charter Arms	Undercover Lite	53863	NO	https://charterfirearms.com/collections/undercover-lite/products/53863-earthborn-undercover-lite
Charter Arms	Undercover Lite	53864	YES	https://charterfirearms.com/collections/undercover-lite/products/53864-santa-fe-undercover-lite-turquoise-black-standard
Charter Arms	Undercover Lite	53870	YES	https://charterfirearms.com/collections/undercover-lite/products/53870-undercover-lite-black-std

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Charter Arms	Undercover Lite	53871	YES	https://charterfirearms.com/collections/undercover-lite/products/53871-undercover-lite-black-hi-polish-stainless-std
Charter Arms	Undercover Lite	53879	YES	https://charterfirearms.com/collections/undercover-lite/products/53879-the-liffany
Charter Arms	Undercover Lite	53889	YES	https://charterfirearms.com/collections/undercover-lite/products/53889-the-leopard
Charter Arms	Undercover Lite	53890	YES	https://charterfirearms.com/collections/undercover-lite/products/53890-goldfinger-gold-tone-black-standard
Charter Arms	Chic Lady	53851	YES	https://charterfirearms.com/collections/chic-lady/products/53851-pink-lady-off-duty
Charter Arms	Chic Lady	53839	YES	https://charterfirearms.com/collections/chic-lady/products/53839-chic-lady
Charter Arms	Chic Lady	53852	YES	https://charterfirearms.com/collections/chic-lady/products/53852-chic-lady-4ao
Charter Arms	Chic Lady	53832	NO	https://charterfirearms.com/collections/chic-lady/products/53832-pink-chic-lady-hi-hi-polish-laser-qtip
Charter Arms	Chic Lady	53842	NO	https://charterfirearms.com/collections/chic-lady/products/53842-lavender-chic-lady
Charter Arms	Chic Lady	53849	YES	https://charterfirearms.com/collections/chic-lady/products/53849-lavender-chic-lady-std
Charter Arms	South Paw	93820	NO	https://charterfirearms.com/collections/southpaw/products/93820-southpaw
Charter Arms	South Paw	93830	NO	https://charterfirearms.com/collections/southpaw/products/93830-pink-southpaw
Charter Arms	Undercoverette	53240	NO	https://charterfirearms.com/collections/undercoverette/products/53240-3-2-hr-lavender-lady
Charter Arms	Undercoverette	73220	YES	https://charterfirearms.com/collections/undercoverette/products/73220-undercoverette-ss-std
Charter Arms	Bulldog	14420	YES	https://charterfirearms.com/collections/bulldog/products/14420-bulldog-blue-standard
Charter Arms	Bulldog	24420	YES	https://charterfirearms.com/collections/bulldog/products/24420-bulldog-44-special-taeer
Charter Arms	Bulldog	34431	NO	https://charterfirearms.com/collections/bulldog/products/34431-44-special-classic-bulldog
Charter Arms	Bulldog	64420	NO	https://charterfirearms.com/collections/bulldog/products/64420-44-special-bulldog-nirride-finish
Charter Arms	Bulldog	74410	NO	https://charterfirearms.com/collections/bulldog/products/74410-bulldog-on-duty-ss-standard
Charter Arms	Bulldog	74420	YES	https://charterfirearms.com/collections/bulldog/products/74420-bulldog-stainless-standard
Charter Arms	Bulldog	74421	NO	https://charterfirearms.com/collections/bulldog/products/74421-bulldog-stainless-4ao
Charter Arms	Bulldog	74424	NO	https://charterfirearms.com/collections/bulldog/products/74424-crimson-bulldog

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Charter Arms	Bulldog	74429	NO	https://charterfirearms.com/collections/bulldog/products/boomer
Charter Arms	Bulldog	74442	NO	https://charterfirearms.com/collections/bulldog/products/74442-44-target-bulldog-with-4-2-barrel
Charter Arms	Bulldog	74530	NO	https://charterfirearms.com/collections/bulldog/products/model74530
Charter Arms	Pitbull	74520	NO	https://charterfirearms.com/collections/pitbull/products/74520-pitbull-45-aco-revolver
Charter Arms	Pitbull	74020	NO	https://charterfirearms.com/collections/pitbull/products/74020-40-pitbull-matte-standard
Charter Arms	Pitbull	79920	YES	https://charterfirearms.com/collections/pitbull/products/79920-9-mm-pitbull-rimless-revolver
Charter Arms	Tiger / Alloy	23520	YES	https://oag.ca.gov/firearms/handgun/23520-tiger
Charter Arms	Pitbull	69920	NO	https://charterfirearms.com/collections/pitbull/products/69920-9-mm-pitbull-nitride-finish
Charter Arms	Pitbull	64520	NO	https://charterfirearms.com/collections/pitbull/products/64520-pitbull-45-aco-nitride-finish
Charter Arms	Pitbull	64020	NO	https://charterfirearms.com/collections/pitbull/products/64020-40-pitbull-nitride-finish
Charter Arms	Mag Pug	73539	NO	https://charterfirearms.com/collections/mag-pug/products/model73539
Charter Arms	Mag Pug	73520	YES	https://charterfirearms.com/collections/mag-pug/products/73520-2-2-mag-pug-ss-standard
Charter Arms	Mag Pug	73542	NO	https://charterfirearms.com/collections/mag-pug/products/73542-ss-full-mag-pug
Charter Arms	Mag Pug	23520	NO	https://charterfirearms.com/collections/mag-pug/products/23520-green-mag-pug
Charter Arms	Mag Pug	73524	NO	https://charterfirearms.com/collections/mag-pug/products/73524-crimson-mag-pug
Charter Arms	Mag Pug	73521	NO	https://charterfirearms.com/collections/mag-pug/products/73521-2-2-mag-pug-ss-4ao
Charter Arms	On Duty	53810	NO	https://charterfirearms.com/collections/on-duty/products/53810-on-duty
Charter Arms	On Duty	73510	NO	https://charterfirearms.com/collections/on-duty/products/73510-mag-pug-on-duty
Charter Arms	Off Duty	53711	YES	https://charterfirearms.com/collections/off-duty/products/53711-undecover-lie-black-dao
Charter Arms	Off Duty	53811	YES	https://charterfirearms.com/collections/off-duty/products/53811-off-duty
Charter Arms	Off Duty	53911	YES	https://charterfirearms.com/collections/off-duty/products/53911-off-duty-black-aluminum-ss-concealed
Charter Arms	Off Duty	53921	YES	https://charterfirearms.com/collections/off-duty/products/53921-off-duty-black-tp-polish-ss-concealed

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Cimarron	EL MALO 2 3.5" 357CT BBL CH THUNDERBALL GRIP	PP340MALO2	Exempt	https://www.cimarron-firearms.com/el-malo-2-3-5-357ct-bbl-ch-thunderball-grip.html
Cimarron	EL MALO 2 3.5" 45 LC OCT BBL CH THUNDERBALL GRIP	PP346MALO2-1	Exempt	https://www.cimarron-firearms.com/el-malo-2-3-5-45-lc-oct-bbl-ch-thunderball-grip.html
Cimarron	EL MALO 2 7.5" 45 LC OCT BBL CK ARMY GRIP	PP415MALO2	Exempt	https://www.cimarron-firearms.com/el-malo-2-7-5-45-lc-oct-bbl-ck-army-grip.html
Cimarron	EL MALO 2 5.5" 45 LC OCT BBL CK ARMY GRIP	PP411MALO2	Exempt	https://www.cimarron-firearms.com/el-malo-2-7-5-45-lc-oct-bbl-ck-army-grip.html
Cimarron	EL MALO 2 4.75" 45 LC OCT BBL CK ARMY GRIP	PP410MALO2	Exempt	https://www.cimarron-firearms.com/el-malo-2.html
Cimarron	EL MALO 2 5.5" 357 OCT BBL CK ARMY GRIP	PP401MALO2	Exempt	https://www.cimarron-firearms.com/el-malo-2-5-5-357-oct-bbl-ck-army-grip.html
Cimarron	EL MALO 2 4.75" 357 OCT BBL CK ARMY GRIP	PP400MALO2	Exempt	https://www.cimarron-firearms.com/el-malo-2-4-7-5-357-oct-bbl-ck-army-grip.html
Cimarron	Doc Holliday Thunderer Stainless Steel 3 1/2" (Gun Only)	CA4506DOCP	Exempt	https://www.cimarron-firearms.com/doc-holliday-thunderer-stainless-steel-3-1-2-in-gun-only.html
Cimarron	Bad Boy .44 Mag, 8"	CA360	Exempt	https://www.cimarron-firearms.com/bad-boy-44-mag-8-in.html
Cimarron	EI Malo .45 LC, 7 1/2 in.	PP415MALO2	Exempt	https://www.cimarron-firearms.com/el-malo-45-lc-7-1-2-in.html
Cimarron	EI Malo® .357/.38 SP., 7 1/2 in.	PP405MALO	Exempt	https://www.cimarron-firearms.com/el-malo-357-38-sp-7-1-2-in.html
Cimarron	EI Malo® .45 LC, 5 1/2 in.	PP411MALO	Exempt	https://www.cimarron-firearms.com/el-malo-45-lc-5-1-2-in.html
Cimarron	EI Malo® .357/.38 SP., 5 1/2 in.	PP401MALO	Exempt	https://www.cimarron-firearms.com/el-malo-357-38-sp-5-1-2-in.html
Cimarron	EI Malo® .45 LC, 4 3/4 in.	PP410MALO	Exempt	https://www.cimarron-firearms.com/el-malo-45-lc-4-3-4-in.html
Cimarron	EI Malo® .357/.38 SP., 4 3/4 in.	PP400MALO	Exempt	https://www.cimarron-firearms.com/el-malo-357-38-sp-4-3-4-in.html
Cimarron	Model P 22LR 4 3/4 in. 12 Shot PW	MP4051	Exempt	https://www.cimarron-firearms.com/model-p-22lr-4-75-12-shot-pw.html
Cimarron	Model No. 3 Schofield .38 Special, 7"	CA857	Exempt	https://www.cimarron-firearms.com/model-no-3-schofield-38-sp-7-in.html
Cimarron	FRONTIER 7.5" .45LC OLD SILVER FRAME LASER ENG CK GRIP PW	PP415L5FW	Exempt	https://www.cimarron-firearms.com/frontier-osf-laser-engr-ck-pp415L5FW.html
Cimarron	SA Frontier Buntline Old Model .45 LC, 10 in.	PP558P	Exempt	https://www.cimarron-firearms.com/sa-frontier-buntline-old-model-45-lc-10-in.html
Cimarron	1911 Wild Bunch® Combo	1911P-COMBO	NO	https://www.cimarron-firearms.com/1911-wild-bunch-combo-1911P-COMBO.html
Cimarron	1875 Outlaw .357 Mag./ .38 SP., 5 1/2"	CA168	Exempt	https://www.cimarron-firearms.com/1875-outlaw-357-mag-38-sp-5-1-2-in.html
Cimarron	Model P Jr. Black Stallion Dual Cylinder, 22 LR/22 Mag, 4 3/4 in.	CA305	Exempt	https://www.cimarron-firearms.com/model-p-jr-black-stallion-dual-cylinder-22-lr-22-mag-4-3-4-in.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Cimarron	U.S. Cavalry Scout Model	CA514N00M00	Exempt	https://www.cimarron-firearms.com/u-s-cavalry-scout-45-tc-7-1-2-nickel-finish.html
Cimarron	1911 Semi Automatic .45 ACP, 5" Barrel-Parkerized	1911	NO	https://www.cimarron-firearms.com/1911-semi-automatic-45-accp-5-barrel-parkerized.html
Cimarron	1858 New Model Army .38 Spl., 5 1/2"	CA1012	Exempt	https://www.cimarron-firearms.com/1858-new-army-38-spl-5-1-2-in-barrel.html
Cimarron	Thunderer® .357 Magnum, 3 1/2"	CA340	Exempt	https://www.cimarron-firearms.com/thunderer-357-magnum-3-1-2-in.html
Cimarron	Thunderer® Stainless .357 Magnum, 3 1/2"	CA4508	Exempt	https://www.cimarron-firearms.com/thunderer-stainless-357-magnum-3-1-2.html
Cimarron	Model No. 3 Schofield .38 Special, 5"	CA858	Exempt	https://www.cimarron-firearms.com/model-no-3-schofield-38-special-5-in.html
Cimarron	Model No. 3 Russian .44 Russian, 6 1/2"	CA865	Exempt	https://www.cimarron-firearms.com/model-no-3-russian-44-russian-6-1-2.html
Cimarron	Pistolero® .357/38 SP., 4 3/4 in.	PPP357	Exempt	https://www.cimarron-firearms.com/pistolero-357-38-sp-4-3-4-in.html
Cimarron	Model P Jr., 22 Long Rifle, 4 3/4 in.	CA3039	Exempt	https://www.cimarron-firearms.com/model-p-jr-22-long-rifle-4-3-4-in.html
Cimarron	Lightning® .22 Long Rifle, 4 3/4"	CA3036	Exempt	https://www.cimarron-firearms.com/lightning-22-long-rifle-4-3-4-in.html
Cimarron	Doc Holiday® Thunderer® Combo 3 1/2"	CA346DOC	Exempt	https://www.cimarron-firearms.com/doc-holiday-thunderer-combo-3-1-2-in.html
Cimarron	Model 1890 .357/38 SP., 5 1/2"	CA157	Exempt	https://www.cimarron-firearms.com/model-1890-357-38-sp-5-1-2.html
Cimarron	1875 Outlaw .357/38 SP, 7 1/2"	CA150	Exempt	https://www.cimarron-firearms.com/1875-outlaw-357-38-sp-7-1-2.html
Cimarron	Model P 4 3/4" 44 WCF	MP522	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-44-wcf-4-3-4-in.html
Cimarron	Model P 4 3/4" 32 WCF	MP666	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-32-wcf-4-3-4-in.html
Cimarron	Frontier™ Stainless Pre War .357 Magnum, 4 3/4 in.	MP4503	Exempt	https://www.cimarron-firearms.com/stainless-frontier-357-magnum-4-3-4-in.html
Cimarron	Model P U.S. Cavalry, 7 1/2", .45 Colt Standard Blue	CA514M00	Exempt	https://www.cimarron-firearms.com/model-p-u-s-cavalry-7-1-2-45-colt-standard-blue.html
Cimarron	New Sheriff Model .357 Magnum, 3 1/2"	CA329	Exempt	https://www.cimarron-firearms.com/new-sheriff-model-357-magnum-3-1-2.html
Cimarron	U.S.V. Artillery .45 COLT, 5 1/2"	PP513M00	Exempt	https://www.cimarron-firearms.com/usv-artillery-45-colt-5-1-2-in.html
Cimarron	Frontier™ Stainless Pre War .45 Colt, 4 3/4 in.	PP4500	Exempt	https://www.cimarron-firearms.com/stainless-frontier-pre-war-45-colt-4-3-4-in.html
Cimarron	Frontier™ Stainless Pre War .357/.38Spl, 4 3/4 in.	PP4503	Exempt	https://www.cimarron-firearms.com/frontier-stainless-tm-pre-war-357-38spl-4-3-4-in.html
Cimarron	Frontier Stainless™ Pre War SA, .45 Colt, 5 1/2 in.	PP4501	Exempt	https://www.cimarron-firearms.com/stainless-frontier-pre-war-sa-45-colt-5-1-2-in.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Cimarron	Frontier Stainless™ Pre War SA, .357/.38Spl, 5 1/2 in.	PP4504	Exempt	https://www.cimarron- firearms.com/stainless-frontier-pre-war-sa-357-38spl-5-1-2-in.html
Cimarron	Frontier Stainless™ Pre War SA, .45 Colt, 7 1/2 in.	PP4502	Exempt	https://www.cimarron- firearms.com/stainless-frontier-pre-war-sa-45-colt-7-1-2-in.html
Cimarron	Frontier Stainless™ Pre War SA, .357/.38Spl, 7 1/2 in.	PP4505	Exempt	https://www.cimarron- firearms.com/stainless-frontier-pre-war-sa-357-38spl-7-1-2-in.html
Cimarron	Frontier Pre War, .357/.38 Spl., 3 1/2 in.	PP329	Exempt	https://www.cimarron- firearms.com/sa-frontier-pre-war-357-38-spl-3-1-2-in.html
Cimarron	Frontier™, .44 WCF, 4 3/4 in.	PP420	Exempt	https://www.cimarron- firearms.com/sa-frontier-pre-war-44-wcf-4-3-4-in.html
Cimarron	Frontier Model, .357/.38 SP, 4 3/4 in.	PP400	Exempt	https://www.cimarron- firearms.com/frontier-model-357-38-sp-4-3-4-in.html
Cimarron	Frontier Model, .45 LC, 4 3/4 in.	PP410	Exempt	https://www.cimarron- firearms.com/frontier-model-45-lc-4-3-4-in.html
Cimarron	SA Frontier Pre War, .44 WCF, 5 1/2 in.	PP421	Exempt	https://www.cimarron- firearms.com/sa-frontier-pre-war-44-wcf-5-1-2-in.html
Cimarron	Frontier Model, .357/.38 SP, 5 1/2 in.	PP401	Exempt	https://www.cimarron- firearms.com/frontier-model-357-38-sp-5-1-2-in.html
Cimarron	Frontier Model, .45 LC, 5 1/2 in.	PP411	Exempt	https://www.cimarron- firearms.com/frontier-model-45-lc-5-1-2-in.html
Cimarron	SA Frontier Pre War, .44 WCF, 7 1/2 in.	PP425	Exempt	https://www.cimarron- firearms.com/sa-frontier-pre-war-44-wcf-7-1-2-in.html
Cimarron	SA Frontier Pre War, .357/.38 Spl., 7 1/2 in.	PP405	Exempt	https://www.cimarron- firearms.com/sa-frontier-pre-war-357-38-spl-7-1-2-in.html
Cimarron	SA Frontier Pre War, .45 Colt, 7 1/2 in.	PP415	Exempt	https://www.cimarron- firearms.com/sa-frontier-pre-war-45-colt-7-1-2-in.html
Cimarron	U.S. Cavalry Model 7 1/2 in, .45 Colt, Standard Blue	PP514M00	Exempt	https://www.cimarron- firearms.com/us-cavalry-model-7-1-2-in-45-colt-standard-blue.html
Cimarron	Bisley Model, .357 Magnum, 4 3/4"	CA602	Exempt	https://www.cimarron- firearms.com/bisley-model-357-magnum-4-3-4.html
Cimarron	1911 Semi Automatic, 45 ACP, 5" Barrel-Polished High Luster Blue	1911P	NO	https://www.cimarron- firearms.com/1911-semi-automatic-45-ACP-5-barrel-polished-high-luster-blue.html
Cimarron	1858 New Model Army, .38 Spl., 7 3/8"	CA1010	Exempt	https://www.cimarron- firearms.com/1858-new-navy-38-spl-7-3-8-in-barrel.html
Cimarron	Thunderer, .357 Magnum, 4 3/4"	CA341	Exempt	https://www.cimarron- firearms.com/thunderer-357-magnum-4-3-4-in.html
Cimarron	Model No. 3 Schofield 44-40, 7"	CA852	Exempt	https://www.cimarron- firearms.com/model-no-3-schofield-44-40-7-in.html
Cimarron	Model No. 3 Russian, .45 LC, 6 1/2"	CA867	Exempt	https://www.cimarron- firearms.com/model-no-3-russian-45-lc-6-1-2.html
Cimarron	Pistolero® .45 COLT, 4 3/4 in.	PPP45	Exempt	https://www.cimarron- firearms.com/pistolero-45-colt-4-3-4-in.html
Cimarron	Model P Jr., .22 Long Rifle, 5 1/2 in.	CA309	Exempt	https://www.cimarron- firearms.com/model-p-jr-22-long-rifle-5-1-2-in.html

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Cimarron	Lightning® .22 Long Rifle, 5 1/2"	CA3037	Exempt	https://www.cimarron-firearms.com/lightning-22-long-rifle-5-1-2-in.html
Cimarron	Model 1890 .44 WCF, 5 1/2"	CA156	Exempt	https://www.cimarron-firearms.com/model-1890-44-wcf-5-1-2.html
Cimarron	1875 Outlaw .44 WCF, 5 1/2"	CA167	Exempt	https://www.cimarron-firearms.com/1875-outlaw-44-wcf-5-1-2.html
Cimarron	Model P 4 3/4" .44 Special	MP677	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-44-special-4-3-4-in.html
Cimarron	Model P 4 3/4" 32 WCF	MP674	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-32-wcf-4-3-4-in-mp674.html
Cimarron	Stainless Frontier® .357 Magnum, 5 1/2"	MP4504	Exempt	https://www.cimarron-firearms.com/stainless-frontier-357-magnum-5-1-2-in.html
Cimarron	New Sheriff Model .44 WCF, 3 1/2"	CA330	Exempt	https://www.cimarron-firearms.com/new-sheriff-model-44-wcf-3-1-2.html
Cimarron	SA Frontier Old Model .44 WCF, 4 3/4 in.	PP522	Exempt	https://www.cimarron-firearms.com/sa-frontier-old-model-44-wcf-4-3-4-in.html
Cimarron	Bisley Model .357 Magnum, 5 1/2"	CA603	Exempt	https://www.cimarron-firearms.com/bisley-model-357-magnum-5-1-2.html
Cimarron	1911 Semi Automatic .45 ACP, 5" Barrel-Nickel	1911N00	NO	https://www.cimarron-firearms.com/1911-semi-automatic-45-ACP-5-barrel-nickel.html
Cimarron	Thunderer® .357 Magnum, 5 1/2"	CA315	Exempt	https://www.cimarron-firearms.com/thunderer-357-magnum-5-1-2-in.html
Cimarron	Thunderer® Stainless .45 LC, 3 1/2"	CA4506	Exempt	https://www.cimarron-firearms.com/thunderer-stainless-45-lc-3-1-2.html
Cimarron	Model No. 3 Schofield .45 LC, 3 1/2"	CA853	Exempt	https://www.cimarron-firearms.com/model-no-3-schofield-45-lc-3-1-2-in.html
Cimarron	Model P Jr. 32-20/.32 H and R Dual Cylinder, 3 1/2 in.	CA990	Exempt	https://www.cimarron-firearms.com/model-p-jr-32-20-32-h-and-r-dual-cylinder-3-1-2-in.html
Cimarron	Lightning® 32-20/.32 H and R Dual Cylinder, 3 1/2 in.	CA3000	Exempt	https://www.cimarron-firearms.com/lightning-32-20-32-h-and-r-dual-cylinder-3-1-2-in.html
Cimarron	Model 1890 .45 COLT, 5 1/2"	CA155	Exempt	https://www.cimarron-firearms.com/model-1890-45-colt-5-1-2.html
Cimarron	1875 Outlaw .44 WCF, 7 1/2"	CA153	Exempt	https://www.cimarron-firearms.com/1875-outlaw-44-wcf-7-1-2.html
Cimarron	Model P 4 3/4" .45 LC	MP512	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-45-lc-4-3-4-in.html
Cimarron	Model P 4 3/4" .357 Magnum	MP502	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-357-magnum-4-3-4-in.html
Cimarron	Stainless Frontier® .357 Magnum, 7 1/2"	MP4505	Exempt	https://www.cimarron-firearms.com/stainless-frontier-357-magnum-7-1-2-in.html
Cimarron	New Sheriff Model .45 LC, 3 1/2"	CA332	Exempt	https://www.cimarron-firearms.com/new-sheriff-model-45-lc-3-1-2.html
Cimarron	SA Frontier Old Model .357/.38 Spl., 4 3/4 in.	PP502	Exempt	https://www.cimarron-firearms.com/sa-frontier-old-model-357-38-spl-4-3-4-in.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Cimarron	Bisley Model .357 Magnum, 7 1/2"	CA604	Exempt	https://www.cimarron-firearms.com/bisley-model-357-magnum-7-1-2-.html
Cimarron	1858 New Model Army 44-40, 5 1/2"	CA1005	Exempt	https://www.cimarron-firearms.com/1858-new-army-44-40-5-1-2-in-barrel.html
Cimarron	Thunderer® .44 S&W Special, 3 1/2"	CA342	Exempt	https://www.cimarron-firearms.com/thunderer-44-special-3-1-2-in.html
Cimarron	Thunderer® Stainless .45 LC, 4 3/4"	CA4507	Exempt	https://www.cimarron-firearms.com/thunderer-stainless-45-lc-4-3-4-.html
Cimarron	Model No. 3 Schofield .45 LC, 5"	CA855	Exempt	https://www.cimarron-firearms.com/model-no-3-schofield-45-lc-5-in.html
Cimarron	Model P Jr. 32-20/.32 H and R Dual Cylinder, 4 3/4 in.	CA991	Exempt	https://www.cimarron-firearms.com/model-p-jr-32-20-32-h-and-r-dual-cylinder-4-3-4-in.html
Cimarron	Lightning® 32-20/.32 H and R Dual Cylinder, 4 3/4"	CA3001	Exempt	https://www.cimarron-firearms.com/lightning-32-20-32-h-and-r-dual-cylinder-4-3-4-in.html
Cimarron	Model 1890 .45 COLT/.45 ACP Dual Cyl., 5 1/2"	CA159	Exempt	https://www.cimarron-firearms.com/model-1890-45-colt-45-accp-dual-cyl-5-1-2-.html
Cimarron	1875 Outlaw .45 COLT, 5 1/2"	CA166	Exempt	https://www.cimarron-firearms.com/1875-outlaw-45-colt-5-1-2-.html
Cimarron	Model P 4 3/4" .45 LC / .45 ACP Dual Cylinder	MP536	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-45-lc-45-accp-dual-cylinder.html
Cimarron	Model P 4 3/4" .357 Magnum	MP400	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-357-magnum-4-3-4-in-mp400.html
Cimarron	Stainless Frontier® .45 LC, 4 3/4"	MP4500	Exempt	https://www.cimarron-firearms.com/stainless-frontier-45-lc-4-3-4-in.html
Cimarron	Cimarron Frontier™ (Sheriff's Model) .45 LC, 3 1/2 in.	PP332	Exempt	https://www.cimarron-firearms.com/new-sheff-sa-frontier-model-45-lc-by-pleta.html
Cimarron	SA Frontier Old Model .45 Colt, 4 3/4 in.	PP512	Exempt	https://www.cimarron-firearms.com/sa-frontier-old-model-45-colt-4-3-4-in.html
Cimarron	Bisley Model .44 Special, 4 3/4"	CA618	Exempt	https://www.cimarron-firearms.com/bisley-model-44-special-4-3-4-.html
Cimarron	1858 New Model Army 44-40, 8"	CA1001	Exempt	https://www.cimarron-firearms.com/1858-new-army-44-40-8-in-barrel.html
Cimarron	Thunderer® .44 Special, 4 3/4"	CA343	Exempt	https://www.cimarron-firearms.com/thunderer-44-special-4-3-4-in.html
Cimarron	Model No. 3 Schofield .45 LC, 7"	CA850	Exempt	https://www.cimarron-firearms.com/model-no-3-schofield-45-lc-7-in.html
Cimarron	Model P Jr. 32-20/.32 H and R Dual Cylinder, 5 1/2 in.	CA992	Exempt	https://www.cimarron-firearms.com/model-p-jr-32-20-32-h-and-r-dual-cylinder-5-1-2-in.html
Cimarron	Lightning® 32-20/.32 H and R Dual Cylinder, 5 1/2"	CA3002	Exempt	https://www.cimarron-firearms.com/lightning-32-20-32-h-and-r-dual-cylinder-5-1-2-in.html
Cimarron	1875 Outlaw .45 COLT, 7 1/2"	CA151	Exempt	https://www.cimarron-firearms.com/1875-outlaw-45-colt-7-1-2-.html
Cimarron	Model P 5 1/2" 32 WCF	MP667	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-32-wcf.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Cimarron	Model P 4 3/4" 38 WCF	MP683	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-38-wcf-4-3-4-in.html
Cimarron	Stainless Frontier® .45 LC, 5 1/2"	MP4501	Exempt	https://www.cimarron-firearms.com/stainless-frontier-45-lc-5-1-2-in.html
Cimarron	SA Frontier Old Model .44 WCF, 5 1/2 in.	PP523	Exempt	https://www.cimarron-firearms.com/sa-frontier-old-model-44-wcf-5-1-2-in.html
Cimarron	Bisley Model .44 Special, 5 1/2"	CA619	Exempt	https://www.cimarron-firearms.com/bisley-model-44-special-5-1-2.html
Cimarron	1858 New Model Army .45 LC, 5 1/2"	CA1004	Exempt	https://www.cimarron-firearms.com/1858-new-army-45-lc-5-1-2-in-barrel.html
Cimarron	Thunderer® 44 WCF, 3 1/2"	CA344	Exempt	https://www.cimarron-firearms.com/thunderer-44-wcf-3-1-2-in.html
Cimarron	Model P Jr. .38 Special, 3 1/2 in.	CA985	Exempt	https://www.cimarron-firearms.com/model-p-jr-38-special-3-1-2-in.html
Cimarron	Lightning® .38 Special, 3 1/2"	CA980	Exempt	https://www.cimarron-firearms.com/lightning-38-special-3-1-2-in.html
Cimarron	1875 Outlaw .45 COLT / .45 ACP Dual Cyl., 7 1/2"	CA154	Exempt	https://www.cimarron-firearms.com/1875-outlaw-45-colt-45-acc-dual-cyl-7-1-2.html
Cimarron	Model P 5 1/2" 38 WCF	MP684	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-38-wcf.html
Cimarron	Model P 4 3/4" 38 WCF	MP685	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-38-wcf.html
Cimarron	Stainless Frontier® .45 LC, 7 1/2"	MP4502	Exempt	https://www.cimarron-firearms.com/stainless-frontier-45-lc-7-1-2-in.html
Cimarron	SA Frontier Old Model .357/.38 Spl., 5 1/2 in.	PP503	Exempt	https://www.cimarron-firearms.com/sa-frontier-old-model-357-38-spl-5-1-2-in.html
Cimarron	Bisley Model .44 Special, 7 1/2"	CA620	Exempt	https://www.cimarron-firearms.com/bisley-model-44-special-7-1-2.html
Cimarron	Thunderer® 44 WCF, 4 3/4"	CA345	Exempt	https://www.cimarron-firearms.com/thunderer-44-wcf-4-3-4-in.html
Cimarron	Model P Jr. .38 Special, 4 3/4 in.	CA986	Exempt	https://www.cimarron-firearms.com/model-p-jr-38-special-4-3-4-in.html
Cimarron	Lightning® .38 Special, 4 3/4"	CA981	Exempt	https://www.cimarron-firearms.com/lightning-38-special-4-3-4-in.html
Cimarron	Model P 5 1/2" .357 Magnum	MP503	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-357-magnum-5-1-2-in.html
Cimarron	Model P 4 3/4" .44 Special	MP680	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-44-special.html
Cimarron	SA Frontier Old Model .45 Colt, 5 1/2 in.	PP513	Exempt	https://www.cimarron-firearms.com/sa-frontier-old-model-45-colt-5-1-2-in.html
Cimarron	Bisley Model 44 WCF, 4 3/4"	CA622	Exempt	https://www.cimarron-firearms.com/bisley-model-44-wcf-4-3-4.html
Cimarron	Thunderer® 44 WCF, 5 1/2"	CA308	Exempt	https://www.cimarron-firearms.com/thunderer-44-wcf-5-1-2-in.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Cimarron	Model P Jr. .38 Special, 5 1/2 in.	CA987	Exempt	https://www.cimarron-firearms.com/model-p-jr-38-special-5-1-2-in.html
Cimarron	Lightning® .38 Special, 5 1/2"	CA982	Exempt	https://www.cimarron-firearms.com/lightning-38-special-5-1-2-in.html
Cimarron	Model P 5 1/2" 44 WCF	MP523	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-44-wcf.html
Cimarron	Model P 4 3/4" 44 WCF	MP420	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-44-wcf.html
Cimarron	SA Frontier Old Model .44 WCF, 7 1/2 in.	PP524	Exempt	https://www.cimarron-firearms.com/sa-frontier-old-model-44-wcf-7-1-2-in.html
Cimarron	Bisley Model 44 WCF, 5 1/2"	CA623	Exempt	https://www.cimarron-firearms.com/bisley-model-44-wcf-5-1-2.html
Cimarron	Thunderer® .45 LC, 3 1/2"	CA346	Exempt	https://www.cimarron-firearms.com/thunderer-45-lc-3-1-2-in.html
Cimarron	Lightning® .41 Colt, 3 1/2"	CA3054	Exempt	https://www.cimarron-firearms.com/lightning-41-colt-3-1-2-in.html
Cimarron	Model P 5 1/2" 44 Special	MP678	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-44-special-5-1-2-in.html
Cimarron	SA Frontier Old Model .357/.38 Spl., 7 1/2 in.	PP504	Exempt	https://www.cimarron-firearms.com/sa-frontier-old-model-357-38-spl-7-1-2-in.html
Cimarron	Bisley Model 44 WCF, 7 1/2"	CA624	Exempt	https://www.cimarron-firearms.com/bisley-model-44-wcf-7-1-2.html
Cimarron	Thunderer® .45 LC, 4 3/4"	CA347	Exempt	https://www.cimarron-firearms.com/thunderer-45-lc-4-3-4-in.html
Cimarron	Lightning® .41 Colt, 4 3/4"	CA3055	Exempt	https://www.cimarron-firearms.com/lightning-41-colt-4-3-4-in.html
Cimarron	Model P 5 1/2" .45 LC	MP513	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-45-lc-5.html
Cimarron	Model P 4 3/4" .45 LC	MP410	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-45-lc.html
Cimarron	SA Frontier Old Model .45 Colt, 7 1/2 in.	PP514	Exempt	https://www.cimarron-firearms.com/sa-frontier-old-model-45-colt-7-1-2-in.html
Cimarron	Bisley Model .45 LC, 4 3/4"	CA612	Exempt	https://www.cimarron-firearms.com/bisley-model-45-lc-4-3-4.html
Cimarron	Thunderer® .45 LC, 5 1/2"	CA326	Exempt	https://www.cimarron-firearms.com/thunderer-45-lc-5-1-2-in.html
Cimarron	Lightning® .41 Colt, 5 1/2"	CA3056	Exempt	https://www.cimarron-firearms.com/lightning-41-colt-5-1-2-in.html
Cimarron	Model P 5 1/2" .45 LC / .45 ACP Dual Cylinder	MP637	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-45-lc-45-acc-dual-cylinder-5-1-2-in.html
Cimarron	Bisley Model .45 LC, 5 1/2"	CA613	Exempt	https://www.cimarron-firearms.com/bisley-model-45-lc-5-1-2.html
Cimarron	Lightning® .41 Colt, 6 1/2"	CA3057	Exempt	https://www.cimarron-firearms.com/lightning-41-colt-6-1-2-in.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Cimarron	Model P 7 1/2" 32 WCF	MP668	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-32-wcf-7-1-2-in.html
Cimarron	Model P 4 3/4" .45 LC / .45 ACP Dual Cylinder	MP436	Exempt	https://www.cimarron-firearms.com/model-p-4-3-4-45-lc-45-acp-dual-cylinder-mp436.html
Cimarron	Bisley Model .45 LC, 7 1/2"	CA614	Exempt	https://www.cimarron-firearms.com/bisley-model-45-lc-7-1-2.html
Cimarron	Model P Old Model 38 WCF, 7 1/2"	MP688	Exempt	https://www.cimarron-firearms.com/model-p-old-model-38-wcf-7-1-2-in.html
Cimarron	Thunderer® .45 LC/45ACP Dual Cylinder, 3 1/2"	CA348	Exempt	https://www.cimarron-firearms.com/thunderer-45-lc-45-acp-dual-cylinder-3-1-2-in.html
Cimarron	Thunderer® .45 LC/45ACP Dual Cylinder, 4 3/4"	CA349	Exempt	https://www.cimarron-firearms.com/thunderer-45-lc-45-acp-dual-cylinder-4-3-4-in.html
Cimarron	Model P 7 1/2" .357 Magnum	MP504	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-357-magnum-7-1-2-in.html
Cimarron	Model P 5 1/2" 32 WCF	MP675	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-32-wcf-mp675.html
Cimarron	Model P 7 1/2" 44 WCF	MP524	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-44-wcf-7-1-2-in.html
Cimarron	Model P 7 1/2" .44 Special	MP679	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-44-special.html
Cimarron	Model P 5 1/2" .357 Magnum	MP401	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-357-magnum-5-1-2-in-mp401.html
Cimarron	Model P 7 1/2" 44 WCF	MP524	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-44-wcf-7-1-2-in.html
Cimarron	Model P 7 1/2" .45 LC	MP514	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-45-lc-7-1-2-in.html
Cimarron	Model P 7 1/2" .45 LC / .45 ACP Dual Cylinder	MP538	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-45-lc-45-acp-dual-cylinder-7-1-2-in.html
Cimarron	Model P 5 1/2" 38 WCF	MP686	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-38-wcf-5-1-2-in.html
Cimarron	Model P 5 1/2" .44 Special	MP681	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-44-special-5-1-2-in-mp681.html
Cimarron	Model P 5 1/2" 44 WCF	MP421	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-44-wcf-5-1-2-in.html
Cimarron	Model P 5 1/2" .45 LC	MP411	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-45-lc-5-1-2-in.html
Cimarron	Model P 5 1/2" .45 LC / .45 ACP Dual Cylinder	MP437	Exempt	https://www.cimarron-firearms.com/model-p-5-1-2-45-lc-45-acp-dual-cylinder-5-1-2-in-mp437.html
Cimarron	Model P 7 1/2" 32 WCF	MP676	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-32-wcf-7-1-2-in-mp676.html
Cimarron	Model P 7 1/2" .357 Magnum	MP405	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-357-magnum.html
Cimarron	Model P 7 1/2" 38 WCF	MP687	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-38-wcf-7-1-2-in.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Cimarron	Model P 7 1/2" .44 Special	MP682	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-44-special-mp682.html
Cimarron	Model P 7 1/2" .44 WCF	MP425	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-44-wcf.html
Cimarron	Model P 7 1/2" .45 LC	MP415	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-45-lc-7-1-2-in-mp415.html
Cimarron	Model P 7 1/2" .45 LC / .45 ACP Dual Cylinder	MP438	Exempt	https://www.cimarron-firearms.com/model-p-7-1-2-45-lc-45-acp-dual-cylinder.html
Coit	1911 Classic (45ACP)	O1911C	NO	https://www.coit.com/detail-page/1911-classic
Coit	1911 Classic SS (38S)	O1911CSS38	NO	https://www.coit.com/detail-page/government-38super-ss
Coit	1911 Classic (38S)	O1911C-38	NO	https://www.coit.com/detail-page/government-38spr-blwd-5-fs
Coit	Royal Blue 1911 Classic	O1911C-RB	NO	https://www.coit.com/detail-page/govt-classic-45acp-royal-blue
Coit	Gold Cup Trophy (45ACP)	O5070XE	NO	https://www.coit.com/detail-page/gold-cup-trophy-45acp
Coit	Gold Cup National Match (45ACP)	O5870A1	NO	https://www.coit.com/detail-page/coit-o5870a1-gold-cup-nlmtc-45-5-bl
Coit	Gold Cup National Match (9MM)	O5872A1	NO	https://www.coit.com/detail-page/gold-cup-nat-match-9mm-bl-5
Coit	Gold Cup (9MM)	O5072GCL	NO	https://www.coit.com/detail-page/ct-gold-cup-lite-9mm-8rd
Coit	Gold Cup (38S)	O5073GCL	NO	https://www.coit.com/detail-page/ct-gold-cup-lite-38sup-8rd
Coit	Gold Cup (45ACP)	O5070GCL	NO	https://www.coit.com/detail-page/gold-cup-lite-45acp-ss-5-as
Coit	Gold Cup Trophy (38S)	O5073XE	NO	https://www.coit.com/detail-page/coit-o5073xe-gold-cup-trophy-38sup-5in-ss
Coit	Defender (45ACP)	O7802XE	NO	https://www.coit.com/detail-page/coit-defender-9mm-3-bk-nms
Coit	Defender SS (45ACP)	O7000XE	NO	https://www.coit.com/detail-page/coit-defender-45acp-3-sts-wd-cn
Coit	Competition Titanium (45ACP)	O1070CCS-BT	NO	https://www.coit.com/detail-page/competition-titanium-45acp
Coit	Competition SS (45ACP)	O1070CCS	NO	https://www.coit.com/detail-page/competition-ser70-45acp-ss-81
Coit	Competition SS (9MM)	O1073CCS	NO	https://www.coit.com/detail-page/competition-ser70-38spr-ss-91
Coit	Competition (9MM)	O1972CCS	NO	https://www.coit.com/detail-page/competition-ser70-9mm-bl-91
Coit	Competition Titanium (9MM)	O1072CCS-BT	NO	https://www.coit.com/detail-page/competition-titanium-9mm

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Coit	Competition SS (38S)	O1073CCS	NO	https://www.coit.com/detail-page/coit-govt-competition-38super
Coit	Competition (45ACP)	O1970CCS	NO	https://www.coit.com/detail-page/competition-ser70-45acp-bl81
Coit	Competition Plus	O1070CCP-TT	NO	https://www.coit.com/detail-page/coit-competition-plus-80
Coit	Delta Elite Two-Tone	O2020XE-TT	NO	https://www.coit.com/detail-page/coit-delta-elite-10mm-5-ft-no-vak
Coit	Delta Elite Rail	O2020RG	NO	https://www.coit.com/detail-page/coit-delta-elite-10mm-fs
Coit	Special Combat Govt (45ACP) Two Tone	not available	NO	https://www.coit.com/detail-page/coit-8-1-ro-unt-special-combat-government-45-acp-5-barrel-blue-satin-nickel
Coit	Bright Government (45ACP)	O1070BSTS	NO	https://www.coit.com/detail-page/coit-govt-45acp-5-wds-sls
Coit	Custom Shop CQB Two-Tone (45ACP)	O1070CQB-FB	NO	https://www.coit.com/detail-page/coit-cqb-govt-45acp-5-7rd-blk/ide
Coit	Combat Commander (45ACP)	O4940XE	NO	https://www.coit.com/detail-page/coi-combat-commander-45acp
Coit	Lightweight Commander (45ACP)	O4840XE	NO	https://www.coit.com/detail-page/lw-commander-45acp
Coit	Defender (9MM)	O7802XE	NO	https://www.coit.com/detail-page/coit-defender-9mm-3-blk-nns
Coit	M45A1 Marine Pistol	O1070M45	NO	https://www.coit.com/detail-page/coit-cmc-marine-pistol-45-acp-brown-5-ns-ail-g-10-grips-night-sights
Coit	Combat Commander (9MM)	O4942XE	NO	https://www.coit.com/detail-page/coi-combat-commander-9mm-425
Coit	Bright Government (38S)	not available	NO	https://www.coit.com/detail-page/coit-custom-government-38-super-5-barrel-brkht-stainless-finish-281-wood-grips-3-dot-sights-thumb-safety-hard-case
Coit	Wiley Clapp Government 1911	O1911WC	NO	https://www.coit.com/detail-page/wiley-clapp-gov-ser-70-45acp
Coit	Wiley Clapp Lightweight Commander (9MM)	O4842WC	NO	https://www.coit.com/detail-page/wiley-clapp-commander-9mm-bl
Coit	Wiley Clapp CCO	O9840WC	NO	https://www.coit.com/detail-page/wiley-clapp-cco-45acp-bl
Coit	1911 Classic SS (45ACP)	O1911C-SS	NO	https://www.coit.com/detail-page/cit-1911-classic-ovt-45ap-7rd-ss
Coit	Combat Elite Commander (9MM)	O4082CE	NO	https://www.coit.com/detail-page/combat-elite-commander-9mm
Coit	Combat Elite Government (45ACP)	O1070CE	NO	https://www.coit.com/detail-page/combat-elite-govt-45acp-ssbk
Coit	Delta Elite	O2020XE	NO	https://www.coit.com/detail-page/coit-1911-government-delta-elite-mkiv-10mm-5-barrel-stainless-finish-281-thumb-safety-checked-delta-grips-hard-case
Coit	Combat Unit CCO (45ACP)	O9840CCU	NO	https://www.coit.com/detail-page/commander-45acp-blk-425-81

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Colt	Combat Unit Rail (45ACP)	O1080RGCCU	NO	https://www.colt.com/detail-page/government-45acp-blk-5-rail
Colt	Combat Unit CCO (9MM)	O9842CCU	NO	https://www.colt.com/detail-page/combat-unit-ccc-9mm-blk-425
Colt	Defender Gray (45ACP)	O7800XE-CG	NO	https://www.colt.com/detail-page/defender-45acp-blgray-3
Colt	Wiley Clapp Commander SS	O4040WC	NO	https://www.colt.com/detail-page/wiley-clapp-commander-45acp-ss
Colt	Combat Elite Defender (9MM)	O7082CE	NO	https://www.colt.com/detail-page/cit-com-eli-4efen-9mm-psf-3-9r
Colt	CCU Government (45ACP)	O1080CCU	NO	https://www.colt.com/detail-page/government-45acp-blk-5-81-ns
Colt	Combat Elite Defender (45ACP)	O7080CE	NO	https://www.colt.com/detail-page/defender-45acp-ssbk-3-81-ns
Colt	Combat Unit Rail (9MM)	O1082RGCCU	NO	https://www.colt.com/detail-page/combat-unit-9mm-blk-5-rail
Colt	Defender Green (45ACP)	O7800XCFG	NO	https://www.colt.com/detail-page/colt-defender-45acp-3-green
Colt	Special Combat Carry	O1970CY	NO	https://www.colt.com/detail-page/colt-special-combat-government-45-acp-5-81-4-double-diamond-grip-blued
Colt	CCU Government (9MM)	O1082CCU	NO	https://www.colt.com/detail-page/combat-unit-9mm-blk-5-ns
Colt	Colt 1903 Parkized (.32ACP)	1903P	NO	https://www.colt.com/detail-page/us-armorment-corporation-1903p-1903-hammerless-single-32-automatic-coolt-pistol-acp-375-81-walnut-grip-parkerized
Colt	Colt 1903 Blued (.32ACP)	1903B	NO	https://www.colt.com/detail-page/us-armorment-corporation-1903b-1903-hammerless-single-32-automatic-coolt-pistol-acp-375-81-walnut-grip-blued
Colt	COBRA	COBRA-MB2BB-HB	NO	https://oaa.ca.gov/firearms/handgun/cobra-cobra-mb2bb-hb
Colt	Colt 1903 Royal Blue (.32ACP)	1903RB	NO	https://www.colt.com/detail-page/us-armorment-corporation-1903rb-1903-hammerless-single-32-automatic-coolt-pistol-acp-375-81-walnut-grip-royal-blue
Colt	Colt 1903 Nickel (.32ACP)	1903N	NO	https://www.colt.com/detail-page/us-armorment-corporation-1903n-1903-hammerless-single-32-automatic-coolt-pistol-acp-375-81-walnut-grip-nickel
Colt	Cobra (38SPL)	SM2FO	YES	https://www.colt.com/detail-page/colt-cobra-38-special-p-2-barrel-stainless-finish-6-round-fiber-optic-sight-rubber-grip-hard-case
Colt	King Cobra Target	KCOBRA-SB4TS	YES	https://www.colt.com/detail-page/king-cobra-target
Colt	Bright Cobra (38SPL)	COBRA-SS2BB	NO	https://www.colt.com/detail-page/bright-cobra-38spc-sswd-2fs
Colt	Night Cobra	COBRA-MB2NS	YES	https://www.colt.com/detail-page/colt-night-cobra-38-special-p-2-barrel-6-round-matte-black-dlc-finish-bobbed-hammer-front-night-sight-10-grips-hard-case
Colt	King Cobra Carry	KCOBRA-SB2BB-S	YES	https://www.colt.com/detail-page/cit-king-cobra-cv-357-da-rev-2
Colt	King Cobra Carry DAO	KCOBRA-SB2BB	YES	https://www.colt.com/detail-page/colt-king-cobra-carry-357mag-2-6rd

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Colt	Classic Cobra (38SPL)	COBRA-SC2BB	NO	https://www.colt.com/detail-page/colt-cobra-classic-38sp-rev-6-ll
Colt	Single Action Army 4.75" (45LC)	P1840	NO	https://www.colt.com/detail-page/sa-army-475-45lc
Colt	Single Action Army 5.5" (45LC)	not available	NO	https://www.colt.com/detail-page/sa-army-55-45lc
Colt	Cobra Two-Tone (38SPL)	COBRA-TT2FO	NO	https://www.colt.com/detail-page/colt-cobra-38spl-2-6rd-stsblk
Colt	Cobra (38SPL)	COBRA-SB2BB	NO	https://www.colt.com/detail-page/colt-cobra-38sp-da-rev-8r-ss
Colt	Single Action Army 7.5" (45LC)	P1870	NO	https://www.colt.com/detail-page/colt-sa-army-45lc-75-cobl-6rd-double-eagle-comp-qntp-5473
Colt	King Cobra	KCOBRA-SB3BB	YES	https://www.colt.com/detail-page/king-cobra-35Z
Colt	Python (4.25")	PYTHON-SP4WTS	YES	https://www.colt.com/detail-page/colt-python-425
Colt	Python (6")	PYTHON-SP6WTS	YES	https://www.colt.com/detail-page/colt-python-6-in
Dan Wesson	715 Revolver	1935	NO	https://danwessonfirearms.com/product/715-revolver/
Dan Wesson	A2	1946	NO	https://danwessonfirearms.com/product/a2/
Dan Wesson	Bruin Bronze 10mm	1841	NO	https://danwessonfirearms.com/product/bruin-2/
Dan Wesson	Bruin Black .45 ACP	1839	NO	https://danwessonfirearms.com/product/bruin-2/
Dan Wesson	Bruin Black 10mm	1840	NO	https://danwessonfirearms.com/product/bruin-2/
Dan Wesson	Commander Classic	1912	YES	https://danwessonfirearms.com/product/commander-classic-bobtail/
Dan Wesson	Discretion	1885	NO	https://danwessonfirearms.com/product/discretion/
Dan Wesson	Discretion 9mm	1886	NO	https://danwessonfirearms.com/product/discretion/
Dan Wesson	Discretion Commander	1887	NO	https://danwessonfirearms.com/product/discretion-commander/
Dan Wesson	Discretion Commander 9mm	1888	NO	https://danwessonfirearms.com/product/discretion-commander/
Dan Wesson	DWX 9MM	92001	NO	https://danwessonfirearms.com/product/dwx/
Dan Wesson	DWX 9MM 10RD	92011	NO	https://danwessonfirearms.com/product/dwx/
Dan Wesson	DWX 40 S&W	92002	NO	https://danwessonfirearms.com/product/dwx/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Dan Wesson	DWX C 9MM RAIL	92101	NO	https://danwessonfirearms.com/product/dwx-compact/
Dan Wesson	DWX C 9MM RAIL 10RD	92111	NO	https://danwessonfirearms.com/product/dwx-compact/
Dan Wesson	DWX C 9MM	92102	NO	https://danwessonfirearms.com/product/dwx-compact/
Dan Wesson	DWX C 9MM 10RD	92112	NO	https://danwessonfirearms.com/product/dwx-compact/
Dan Wesson	ECO	1968	NO	https://danwessonfirearms.com/product/eco/
Dan Wesson	ECO .45 ACP	1969	NO	https://danwessonfirearms.com/product/eco/
Dan Wesson	ECP 45 ACP	1883	NO	https://danwessonfirearms.com/product/ecp/
Dan Wesson	ECP 9mm	1884	NO	https://danwessonfirearms.com/product/ecp/
Dan Wesson	Guardian .45 ACP	1829	NO	https://danwessonfirearms.com/product/guardian-2/
Dan Wesson	Guardian 9mm	1828	NO	https://danwessonfirearms.com/product/guardian-2/
Dan Wesson	Guardian .38 Super	1838	NO	https://danwessonfirearms.com/product/guardian-2/
Dan Wesson	Heirloom 2020	1822	NO	https://danwessonfirearms.com/product/heirloom-2020/
Dan Wesson	Heritage	1858	NO	https://danwessonfirearms.com/product/heritage/
Dan Wesson	Kodiak	1852	NO	https://danwessonfirearms.com/product/kodiak/
Dan Wesson	Kodiak Black	1853	NO	https://danwessonfirearms.com/product/kodiak/
Dan Wesson	Pointman 45 PM-45	1943	NO	https://danwessonfirearms.com/product/pointman-45-pm-45-2/
Dan Wesson	Pointman Carry PM-C	1843	NO	https://danwessonfirearms.com/product/pointman-carry-pm-c/
Dan Wesson	Pointman Nine PM-9	1942	NO	https://danwessonfirearms.com/product/pointman-nine-pm-9-2/
Dan Wesson	Pointman Seven PM-7	1900	YES	https://danwessonfirearms.com/product/pointman-seven-pm-7/
Dan Wesson	Razorback	1889	NO	https://danwessonfirearms.com/product/razorback/
Dan Wesson	Specialist Stainless .45 ACP	1802	NO	https://danwessonfirearms.com/product/specialist-2/
Dan Wesson	Specialist Stainless 9mm	1807	NO	https://danwessonfirearms.com/product/specialist-2/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Dan Wesson	Specialist Stainless 10mm	1815	NO	https://danwessonfirearms.com/product/specialist-2/
Dan Wesson	Specialist Black .45 ACP	1801	NO	https://danwessonfirearms.com/product/specialist-2/
Dan Wesson	Specialist Black 9mm	1806	NO	https://danwessonfirearms.com/product/specialist-2/
Dan Wesson	Specialist Black 10mm	1814	NO	https://danwessonfirearms.com/product/specialist-2/
Dan Wesson	Specialist Commander	1809	NO	https://danwessonfirearms.com/product/specialist-commander-2/
Dan Wesson	Specialist Commander Black	1808	NO	https://danwessonfirearms.com/product/specialist-commander-2/
Dan Wesson	Specialist Distressed	1805	NO	https://danwessonfirearms.com/product/specialist-distressed-2/
Dan Wesson	TCP 45 ACP	1846	NO	https://danwessonfirearms.com/product/tcp/
Dan Wesson	TCP 9mm	1845	NO	https://danwessonfirearms.com/product/tcp/
Dan Wesson	V-Bob Black .45 ACP	1826	NO	https://danwessonfirearms.com/product/v-bob-2/
Dan Wesson	V-Bob Stainless .45 ACP	1827	NO	https://danwessonfirearms.com/product/v-bob-2/
Dan Wesson	V-Bob Two-Tone .45 ACP	1825	NO	https://danwessonfirearms.com/product/v-bob-two-tone/
Dan Wesson	Valkyrie	1965	NO	https://danwessonfirearms.com/product/valkyrie/
Dan Wesson	Valkyrie .45 ACP	1966	NO	https://danwessonfirearms.com/product/valkyrie/
Dan Wesson	Valor Stainless .45 ACP	1824	NO	https://danwessonfirearms.com/product/valor-2/
Dan Wesson	Valor Black .45 ACP	1823	NO	https://danwessonfirearms.com/product/valor-2/
Dan Wesson	Vigil	1832	NO	https://danwessonfirearms.com/product/vigil/
Dan Wesson	Vigil 9mm	1833	NO	https://danwessonfirearms.com/product/vigil/
Dan Wesson	Vigil CCO	1836	NO	https://danwessonfirearms.com/product/vigil-cco/
Dan Wesson	Vigil CCO 9mm	1837	NO	https://danwessonfirearms.com/product/vigil-cco/
Dan Wesson	Vigil Commander	1834	NO	https://danwessonfirearms.com/product/vigil-commander/
Dan Wesson	Vigil Commander 9mm	1835	NO	https://danwessonfirearms.com/product/vigil-commander/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Dan Wesson	Vigil Suppressor-Ready 9mm	1831	NO	https://danwessonfirearms.com/product/vigil-suppressor-ready/
Dan Wesson	Vigil Suppressor-Ready	1830	NO	https://danwessonfirearms.com/product/vigil-suppressor-ready/
Dan Wesson	Wrath	1810	NO	https://danwessonfirearms.com/product/wrath-copv/
Dan Wesson	Wrath 10mm	1811	NO	https://danwessonfirearms.com/product/wrath-copv/
Dan Wesson	Wrath 9mm	1812	NO	https://danwessonfirearms.com/product/wrath-copv/
European American Armory Corp	Gisan MC1911 45 acp black	390070	NO	https://eaacorp.com/product/gisan-mc1911-c-mc-1911-c-iv/
European American Armory Corp	Gisan MC1911 45 acp DARK EARTH	390074	NO	https://eaacorp.com/product/gisan-mc1911-c-mc-1911-c-iv/
European American Armory Corp	Gisan MC1911 45 acp TWO TONE	390072	NO	https://eaacorp.com/product/gisan-mc1911-c-mc-1911-c-iv/
European American Armory Corp	Gisan MC1911 9mm black	390050	NO	https://eaacorp.com/product/gisan-mc1911-c-mc-1911-c-iv/
European American Armory Corp	Gisan MC1911 9mm dark earth	390054	NO	https://eaacorp.com/product/gisan-mc1911-c-mc-1911-c-iv/
European American Armory Corp	Gisan MC1911 9mm TWO TONE	390052	NO	https://eaacorp.com/product/gisan-mc1911-c-mc-1911-c-iv/
European American Armory Corp	Gisan MC1911 45 acp black with optics	390071	NO	https://eaacorp.com/product/gisan-mc1911-c-mc-1911-c-iv/
European American Armory Corp	Gisan MC1911 45 acp DARK EARTH with optics	390075	NO	https://eaacorp.com/product/gisan-mc1911-c-mc-1911-c-iv/
European American Armory Corp	Gisan MC1911 45 acp TWO TONE with optics	390073	NO	https://eaacorp.com/product/gisan-mc1911-c-mc-1911-c-iv/
European American Armory Corp	Gisan MC1911 9mm black with optics	390051	NO	https://eaacorp.com/product/gisan-mc1911-c-mc-1911-c-iv/
European American Armory Corp	Gisan MC1911 9mm dark earth with optics	390055	NO	https://eaacorp.com/product/gisan-mc1911-c-mc-1911-c-iv/
European American Armory Corp	Gisan MC1911 9mm TWO TONE with optics	390053	NO	https://eaacorp.com/product/gisan-mc1911-c-mc-1911-c-iv/
European American Armory Corp	Gisan MC1911 Gold Lux	390093	NO	https://eaacorp.com/product/gisan-1911-gold-lux/
European American Armory Corp	Gisan MC1911 Lux	7.41567E+11	NO	https://eaacorp.com/product/gisan-mc1911-lux/
European American Armory Corp	Gisan MC1911 Match black	390090	NO	https://eaacorp.com/product/gisan-mc1911-match/
European American Armory Corp	Gisan MC1911 Match Nickle	390094	NO	https://eaacorp.com/product/gisan-mc1911-match/
European American Armory Corp	Gisan MC1911 Match TWO TONE	390092	NO	https://eaacorp.com/product/gisan-mc1911-match/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
European American Armory Corp	Gislan MC1911 Match Ellie	390095	NO	https://eaacorp.com/product/gislan-mc1911-match-ellie/
European American Armory Corp	Gislan MC1911 Noel 45ACP	390099	NO	https://eaacorp.com/product/gislan-mc-1911-noel/
European American Armory Corp	Gislan MC1911 Noel 9MM	390097	NO	https://eaacorp.com/product/gislan-mc-1911-noel/
European American Armory Corp	Gislan MC1911 S Black	390060	NO	https://eaacorp.com/product/gislan-mc1911-s/
European American Armory Corp	Gislan MC1911 S Dark Earth	390064	NO	https://eaacorp.com/product/gislan-mc1911-s/
European American Armory Corp	Gislan MC1911 S Two-Tone	390062	NO	https://eaacorp.com/product/gislan-mc1911-s/
European American Armory Corp	Gislan MC1911 S Black with optics	390061	NO	https://eaacorp.com/product/gislan-mc1911-s/
European American Armory Corp	Gislan MC1911 S Dark Earth with optics	390065	NO	https://eaacorp.com/product/gislan-mc1911-s/
European American Armory Corp	Gislan MC1911 S Two-Tone with optics	390063	NO	https://eaacorp.com/product/gislan-mc1911-s/
European American Armory Corp	Gislan MC1911 SC 45 a cp black	390040	NO	https://eaacorp.com/product/gislan-mc1911-sc/
European American Armory Corp	Gislan MC1911 SC 45 a cp dark earth	390044	NO	https://eaacorp.com/product/gislan-mc1911-sc/
European American Armory Corp	Gislan MC1911 SC 45 a cp two tone	390042	NO	https://eaacorp.com/product/gislan-mc1911-sc/
European American Armory Corp	Gislan MC1911 SC 9mm black	390045	NO	https://eaacorp.com/product/gislan-mc1911-sc/
European American Armory Corp	Gislan MC1911 SC 9mm dark earth	390047	NO	https://eaacorp.com/product/gislan-mc1911-sc/
European American Armory Corp	Gislan MC1911 SC 9mm Two-Tone	390046	NO	https://eaacorp.com/product/gislan-mc1911-sc/
European American Armory Corp	Gislan MC1911 SC Ultimate 45 a cp black	390035	NO	https://eaacorp.com/product/gislan-mc1911-sc-ultimate/
European American Armory Corp	Gislan MC1911 SC Ultimate 45 a cp dark earth	390034	NO	https://eaacorp.com/product/gislan-mc1911-sc-ultimate/
European American Armory Corp	Gislan MC1911 SC Ultimate 9mm black	390036	NO	https://eaacorp.com/product/gislan-mc1911-sc-ultimate/
European American Armory Corp	Gislan MC1911 SC Ultimate 9mm dark earth	390037	NO	https://eaacorp.com/product/gislan-mc1911-sc-ultimate/
European American Armory Corp	Gislan MC28 SA 9mm black	390100	NO	https://eaacorp.com/product/gislan-mc28-sa/
European American Armory Corp	Gislan MC28 SA 9mm dark earth	390110	NO	https://eaacorp.com/product/gislan-mc28-sa/
European American Armory Corp	Gislan MC28 SA 9mm two tone	390105	NO	https://eaacorp.com/product/gislan-mc28-sa/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
European American Armory Corp	Gisan MC28 SA-TV 9mm black	390130	NO	https://eaacorp.com/product/gisan-mc28-sa-tv/
European American Armory Corp	Gisan MC28 SA-TV 9mm dark earth	390140	NO	https://eaacorp.com/product/gisan-mc28-sa-tv/
European American Armory Corp	Gisan MC28 SA-TV Two-Tone	390135	NO	https://eaacorp.com/product/gisan-mc28-sa-tv/
European American Armory Corp	Gisan MC28 SA-TV-BX 9mm Black	390131	NO	https://eaacorp.com/product/gisan-mc28-sa-tv-bx/
European American Armory Corp	Gisan MC28 SA-TV-BX 9mm Dark Earth	390141	NO	https://eaacorp.com/product/gisan-mc28-sa-tv-bx/
European American Armory Corp	Gisan MC9 with Red Magwell	390355	NO	https://eaacorp.com/product/gisan-mc9/
European American Armory Corp	Gisan MC9 black	390350	NO	https://eaacorp.com/product/gisan-mc9/
European American Armory Corp	Gisan Regard MC Black	390080	NO	https://eaacorp.com/product/gisan-mc-regard/
European American Armory Corp	Gisan Regard MC Dark Earth	390084	NO	https://eaacorp.com/product/gisan-mc-regard/
European American Armory Corp	Gisan Regard MC Two-Tone	390082	NO	https://eaacorp.com/product/gisan-mc-regard/
European American Armory Corp	Gisan Regard MC BX Black	390081	NO	https://eaacorp.com/product/gisan-mc-bx/
European American Armory Corp	Gisan Regard MC BX Dark Earth	390085	NO	https://eaacorp.com/product/gisan-mc-bx/
European American Armory Corp	Gisan Regard MC Deluxe	390088	NO	https://eaacorp.com/product/gisan-mc-deluxe/
European American Armory Corp	Gisan Regard MC Sport GEN 4	390087	NO	https://eaacorp.com/product/gisan-mc-sport-gen-4/
European American Armory Corp	Tanfoglio Witness Domina Xtreme 35 sup	610680	NO	https://eaacorp.com/product/tanfoglio-witness-domina-xtreme/
European American Armory Corp	Tanfoglio Witness Domina Xtreme 9mm	610690	NO	https://eaacorp.com/product/tanfoglio-witness-domina-xtreme/
European American Armory Corp	Tanfoglio Witness Elite Gold Team 38SUP	600095	NO	https://eaacorp.com/product/tanfoglio-witness-elite-gold-team/
European American Armory Corp	Tanfoglio Witness Elite Gold Team 45ACP	600090	NO	https://eaacorp.com/product/tanfoglio-witness-elite-gold-team/
European American Armory Corp	Tanfoglio Witness Elite Gold Team 9MM	600066	NO	https://eaacorp.com/product/tanfoglio-witness-elite-gold-team/
European American Armory Corp	Tanfoglio Witness Elite Ltd 10M	600343	NO	https://eaacorp.com/product/tanfoglio-witness-elite-limited/
European American Armory Corp	Tanfoglio Witness Elite Ltd 38 SUPER	600350	NO	https://eaacorp.com/product/tanfoglio-witness-elite-limited/
European American Armory Corp	Tanfoglio Witness Elite Ltd 40SW	600320	NO	https://eaacorp.com/product/tanfoglio-witness-elite-limited/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
European American Armory Corp	Tanfoglio Witness Elite Ltd 45 ACP	600340	NO	https://eaacorp.com/product/tanfoglio-witness-elite-limited/
European American Armory Corp	Tanfoglio Witness Elite Ltd 9MM	600310	NO	https://eaacorp.com/product/tanfoglio-witness-elite-limited/
European American Armory Corp	Tanfoglio Witness Elite Ltd Custom 10 mm	600338	NO	https://eaacorp.com/product/tanfoglio-witness-elite-limited-custom/
European American Armory Corp	Tanfoglio Witness Elite Ltd Custom 35 Sup	600334	NO	https://eaacorp.com/product/tanfoglio-witness-elite-limited-custom/
European American Armory Corp	Tanfoglio Witness Elite Ltd Custom 40 SW	600332	NO	https://eaacorp.com/product/tanfoglio-witness-elite-limited-custom/
European American Armory Corp	Tanfoglio Witness Elite Ltd Custom 45 ACP	600336	NO	https://eaacorp.com/product/tanfoglio-witness-elite-limited-custom/
European American Armory Corp	Tanfoglio Witness Elite Ltd Custom 9mm	600330	NO	https://eaacorp.com/product/tanfoglio-witness-elite-limited-custom/
European American Armory Corp	Tanfoglio Witness Elite Match 10mm	600650	NO	https://eaacorp.com/product/tanfoglio-witness-elite-match/
European American Armory Corp	Tanfoglio Witness Elite Match 38 sup	600655	NO	https://eaacorp.com/product/tanfoglio-witness-elite-match/
European American Armory Corp	Tanfoglio Witness Elite Match 40sw	600670	NO	https://eaacorp.com/product/tanfoglio-witness-elite-match/
European American Armory Corp	Tanfoglio Witness Elite Match 45 acp	600640	NO	https://eaacorp.com/product/tanfoglio-witness-elite-match/
European American Armory Corp	Tanfoglio Witness Elite Match 9mm	600660	NO	https://eaacorp.com/product/tanfoglio-witness-elite-match/
European American Armory Corp	Tanfoglio Witness Elite Stock II 10mm	600615	NO	https://eaacorp.com/product/tanfoglio-witness-elite-stock-ii/
European American Armory Corp	Tanfoglio Witness Elite Stock II 4.5 acp	600612	NO	https://eaacorp.com/product/tanfoglio-witness-elite-stock-ii/
European American Armory Corp	Tanfoglio Witness Elite Stock II 9mm	600605	NO	https://eaacorp.com/product/tanfoglio-witness-elite-stock-ii/
European American Armory Corp	Tanfoglio Witness Elite Stock II Optic	600607	NO	https://eaacorp.com/product/tanfoglio-witness-elite-stock-ii-optic/
European American Armory Corp	Tanfoglio Witness Elite Stock III 10 mm	600580	NO	https://eaacorp.com/product/tanfoglio-witness-elite-stock-iii/
European American Armory Corp	Tanfoglio Witness Elite Stock III 4.5acp	600585	NO	https://eaacorp.com/product/tanfoglio-witness-elite-stock-iii/
European American Armory Corp	Tanfoglio Witness Elite Stock III 9mm	600595	NO	https://eaacorp.com/product/tanfoglio-witness-elite-stock-iii/
European American Armory Corp	Tanfoglio Witness Hunter	600252	NO	https://eaacorp.com/product/tanfoglio-witness-hunter/
European American Armory Corp	Tanfoglio Witness Ltd Custom Xtreme 40sw	610322	NO	https://eaacorp.com/product/tanfoglio-witness-limited-custom-xtreme/
European American Armory Corp	Tanfoglio Witness Ltd Custom Xtreme 9mm	610312	NO	https://eaacorp.com/product/tanfoglio-witness-limited-custom-xtreme/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
European American Armory Corp	Tanfoglio Witness P Carry	600248	NO	https://eaacorp.com/product/tanfoglio-witness-p-carry/
European American Armory Corp	Tanfoglio Witness P Compact	999063	NO	https://eaacorp.com/product/tanfoglio-witness-p-compact/
European American Armory Corp	Tanfoglio Witness P Full Size	999061	NO	https://eaacorp.com/product/tanfoglio-witness-p-full-size/
European American Armory Corp	Tanfoglio Witness P Match Pro 10mm	600647	NO	https://eaacorp.com/product/tanfoglio-witness-p-match-pro/
European American Armory Corp	Tanfoglio Witness P Match Pro 45 acp	600643	NO	https://eaacorp.com/product/tanfoglio-witness-p-match-pro/
European American Armory Corp	Tanfoglio Witness P Match Pro 9mm	600663	NO	https://eaacorp.com/product/tanfoglio-witness-p-match-pro/
European American Armory Corp	Tanfoglio Witness Steel Compact 10mm	999230	NO	https://eaacorp.com/product/tanfoglio-witness-compact/
European American Armory Corp	Tanfoglio Witness Steel Compact 9mm	999099	NO	https://eaacorp.com/product/tanfoglio-witness-compact/
European American Armory Corp	Tanfoglio Witness Steel Full Size 10mm	999220	NO	https://eaacorp.com/product/tanfoglio-witness-full-size/
European American Armory Corp	Tanfoglio Witness Steel Full Size 9mm	999101	NO	https://eaacorp.com/product/tanfoglio-witness-full-size/
European American Armory Corp	Tanfoglio Witness Stock II Xtreme 40sw	610610	NO	https://eaacorp.com/product/tanfoglio-witness-stock-ii-xtreme/
European American Armory Corp	Tanfoglio Witness Stock II Xtreme 9mm	610606	NO	https://eaacorp.com/product/tanfoglio-witness-stock-ii-xtreme/
European American Armory Corp	Tanfoglio Witness Stock III Xtreme	610592	NO	https://eaacorp.com/product/tanfoglio-witness-stock-iii-xtreme/
European American Armory Corp	Tanfoglio Witness Stock III Xtreme	610600	NO	https://eaacorp.com/product/tanfoglio-witness-stock-iii-xtreme/
European American Armory Corp	Weihrrauch Bounty Hunter 357 Mag case Black 4.5	770061	NO	https://eaacorp.com/product/weihrrauch-bounty-hunter/
European American Armory Corp	Weihrrauch Bounty Hunter 357 Mag case Case 4.5	770065	NO	https://eaacorp.com/product/weihrrauch-bounty-hunter/
European American Armory Corp	Weihrrauch Bounty Hunter 357 Mag Nickel 4.5	770070	NO	https://eaacorp.com/product/weihrrauch-bounty-hunter/
European American Armory Corp	Weihrrauch Bounty Hunter 44 Mag Black 4.5	770075	NO	https://eaacorp.com/product/weihrrauch-bounty-hunter/
European American Armory Corp	Weihrrauch Bounty Hunter 44 Mag Case 4.5	770080	NO	https://eaacorp.com/product/weihrrauch-bounty-hunter/
European American Armory Corp	Weihrrauch Bounty Hunter 44 Mag Nickel 4.5	770085	NO	https://eaacorp.com/product/weihrrauch-bounty-hunter/
European American Armory Corp	Weihrrauch Bounty Hunter 45 LC Black 4.5	770090	NO	https://eaacorp.com/product/weihrrauch-bounty-hunter/
European American Armory Corp	Weihrrauch Bounty Hunter 45 LC Case 4.5	770095	NO	https://eaacorp.com/product/weihrrauch-bounty-hunter/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
European American Armory Corp	Weihrauch Bounty Hunter 45 LC Nickel 4.5	770098	NO	https://eaacorp.com/product/weihrauch-bounty-hunter/
European American Armory Corp	Weihrauch Bounty Hunter 357 Mag case Black 7.5	770001	NO	https://eaacorp.com/product/weihrauch-bounty-hunter/
European American Armory Corp	Weihrauch Bounty Hunter 357 Mag case Case 7.5	770003	NO	https://eaacorp.com/product/weihrauch-bounty-hunter/
European American Armory Corp	Weihrauch Bounty Hunter 357 Mag Nickel 7.5	770072	NO	https://eaacorp.com/product/weihrauch-bounty-hunter/
European American Armory Corp	Weihrauch Bounty Hunter 44 Mag Black 7.5	770028	NO	https://eaacorp.com/product/weihrauch-bounty-hunter/
European American Armory Corp	Weihrauch Bounty Hunter 44 Mag Case 7.5	770030	NO	https://eaacorp.com/product/weihrauch-bounty-hunter/
European American Armory Corp	Weihrauch Bounty Hunter 44 Mag Nickel 7.5	770086	NO	https://eaacorp.com/product/weihrauch-bounty-hunter/
European American Armory Corp	Weihrauch Bounty Hunter 45 LC Black 7.5	770022	NO	https://eaacorp.com/product/weihrauch-bounty-hunter/
European American Armory Corp	Weihrauch Bounty Hunter 45 LC Case 7.5	770020	NO	https://eaacorp.com/product/weihrauch-bounty-hunter/
European American Armory Corp	Weihrauch Bounty Hunter 45 LC Nickel 7.5	770055	NO	https://eaacorp.com/product/weihrauch-bounty-hunter/
European American Armory Corp	Weihrauch Windicator Black 357 mag 2"	770130	NO	https://eaacorp.com/product/weihrauch-windicator/
European American Armory Corp	Weihrauch Windicator Nickel 357 mag 2"	770127	NO	https://eaacorp.com/product/weihrauch-windicator/
European American Armory Corp	Weihrauch Windicator Black 357 mag 4"	770130	NO	https://eaacorp.com/product/weihrauch-windicator/
European American Armory Corp	Weihrauch Windicator Nickel 357 mag 4"	770128	NO	https://eaacorp.com/product/weihrauch-windicator/
European American Armory Corp	Weihrauch Windicator Black 357 mag 6"	770134	NO	https://eaacorp.com/product/weihrauch-windicator/
European American Armory Corp	Weihrauch Windicator Black 38SLP 2"	770125	YES	https://eaacorp.com/product/weihrauch-windicator/
European American Armory Corp	Weihrauch Windicator Black 38SLP 4"	770123	NO	https://eaacorp.com/product/weihrauch-windicator/
European American Armory Corp	SBA3 Arm Brace - Titanium Gisan MC28 SA-TV	7.41567E+11	NO	https://eaacorp.com/product/gisan-mc28-sa-tv/
European American Armory Corp	Gisan MC28 SA-TV-BX	7.41567E+11	NO	https://eaacorp.com/product/gisan-mc28-sa-tv-bx/
European American Armory Corp	Gisan Regard MC BX	7.41567E+11	NO	https://eaacorp.com/product/gisan-regard-mc-bx/
FN-USA	FN 503	66-100098-1	NO	https://fnamerica.com/products/pistols/fn-503/
FN-USA	FN 509C T FDE/FDE 1X12, 1X15, 1X24	66-100780	NO	https://fnamerica.com/products/fn-509-series/fn-509-compact-tactical/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
FN-USA	FN 509C T FDE/FDE 3X10	66-100781	NO	https://fnamerica.com/products/fn-509-series/fn-509-compact-tactical-blk/
FN-USA	FN 509C T BLK/BLK 1X12, 1X15, 1X24	66-100782	NO	https://fnamerica.com/products/fn-509-series/fn-509-compact-tactical-blk/
FN-USA	FN 509C T BLK/BLK 3X10	66-100783	NO	https://fnamerica.com/products/fn-509-series/fn-509-compact-tactical-blk/
FN-USA	FN 509C MRD NMS BLK/BLK DS 1X12 1X15	66-100571	NO	https://fnamerica.com/products/fn-509-series/fn-509-compact-mrd-blk/
FN-USA	FN 509C MRD NMS BLK/BLK DS 2X10	66-100572	NO	https://fnamerica.com/products/fn-509-series/fn-509-compact-mrd-blk/
FN-USA	FN 509C MRD NMS FDE/FDE DS 1X12 1X15	66-100574	NO	https://fnamerica.com/products/fn-509-series/fn-509-compact-mrd-blk/
FN-USA	FN 509C MRD NMS FDE/FDE DS 2X10	66-100575	NO	https://fnamerica.com/products/fn-509-series/fn-509-compact-mrd-blk/
FN-USA	FN 509M NMS BLK/BLK MRD 2X15	66-100587	NO	https://fnamerica.com/products/pistols/fn-509-midsize-md/
FN-USA	FN 509M NMS BLK/BLK MRD 2X10	66-100588	NO	https://fnamerica.com/products/pistols/fn-509-midsize-md/
FN-USA	FN 509M MRD NMS FDE/FDE 2X15	66-100741	NO	https://fnamerica.com/products/pistols/fn-509-midsize-md/
FN-USA	FN 509M MRD NMS FDE/FDE 2X10	66-100742	NO	https://fnamerica.com/products/pistols/fn-509-midsize-md/
FN-USA	FN 509T NMS FDE/FDE NS (1) 17-Rnd (1) 24-Rnd	66-100373	NO	https://fnamerica.com/products/pistols/fn-509-tactical/
FN-USA	FN 509T NMS FDE/FDE NS 2X10	66-100383	NO	https://fnamerica.com/products/pistols/fn-509-tactical/
FN-USA	FN 509T NMS BLK/BLK NS (1) 17-Rnd (1) 24-Rnd	66-100375	NO	https://fnamerica.com/products/pistols/fn-509-tactical/
FN-USA	FN 509T NMS BLK/BLK NS 2X10	66-100527	NO	https://fnamerica.com/products/pistols/fn-509-tactical/
FN-USA	FN 509 9mm Mag 24RD	20-100032-3	NO	https://fnamerica.com/products/pistols/fn-509-tactical/
FN-USA	FN 509 9mm Mag 17RD FDE	20-100346-1	NO	https://fnamerica.com/products/pistols/fn-509-tactical/
FN-USA	FN 509 9mm Mag 10RD FDE	20-100346-2	NO	https://fnamerica.com/products/pistols/fn-509-tactical/
FN-USA	FN 509 9mm Mag 17RD BK	20-100032-1	NO	https://fnamerica.com/products/pistols/fn-509-tactical/
FN-USA	FN 509 9mm Mag 10RD BK	20-100032-2	NO	https://fnamerica.com/products/pistols/fn-509-tactical/
FN-USA	FNX-9 DA/SA MS Blk/Blk (2) 17-Rnd	66822	NO	https://fnamerica.com/products/pistols/fnx-9/
FN-USA	FNX-9 DA/SA MS Blk/Blk (2) 10-Rnd	66836	NO	https://fnamerica.com/products/pistols/fnx-9/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
FN-USA	FNX-9 DA/SA MS Blk/SS (2) 17-Rnd	66826	NO	https://fnamerica.com/products/pistols/fnx-9/
FN-USA	FNX-9 Magazine 17-Rnd Blk	47694-2	NO	https://fnamerica.com/products/pistols/fnx-9/
FN-USA	FNX-9 Magazine 10-Rnd Blk	47694-4	NO	https://fnamerica.com/products/pistols/fnx-9/
FN-USA	FNX-45 DA/SA MS Blk/Blk (2) 15-Rnd	66960	NO	https://fnamerica.com/products/pistols/fnx-45/
FN-USA	FNX-45 DA/SA MS Blk/Blk (2) 10-Rnd	66961	NO	https://fnamerica.com/products/pistols/fnx-45/
FN-USA	FNX-45 DA/SA MS Blk/SS (2) 15-Rnd	66962	NO	https://fnamerica.com/products/pistols/fnx-45/
FN-USA	FNX-45 DA/SA MS Blk/SS (2) 10-Rnd	66963	NO	https://fnamerica.com/products/pistols/fnx-45/
FN-USA	FNX-45 DA/SA MS FDE/Blk (2) 15-Rnd	66964	NO	https://fnamerica.com/products/pistols/fnx-45/
FN-USA	FNX-45 DA/SA MS FDE/Blk (2) 10-Rnd	66965	NO	https://fnamerica.com/products/pistols/fnx-45/
FN-USA	FNX-45 Magazine 15-Rnd Blk	66322-5	NO	https://fnamerica.com/products/pistols/fnx-45/
FN-USA	FNX-45 Magazine 10-Rnd Blk	66322-1	NO	https://fnamerica.com/products/pistols/fnx-45/
FN-USA	FNX-45 Magazine 15-Rnd FDE	66322-6	NO	https://fnamerica.com/products/pistols/fnx-45/
FN-USA	FNX-45 Magazine 10-Rnd FDE	66322-2	NO	https://fnamerica.com/products/pistols/fnx-45/
FN-USA	FNX-45 Tactical DA/SA MS Blk/Blk (2) 15-Rnd Night Sight	66966	NO	https://fnamerica.com/products/pistols/fnx-45-tactical/
FN-USA	FNX-45 Tactical DA/SA MS Blk/Blk (2) 10-Rnd Night Sight	66981	NO	https://fnamerica.com/products/pistols/fnx-45-tactical/
FN-USA	FNX-45 Tactical DA/SA MS FDE/FDE (2) 15-Rnd Night Sight	66968	NO	https://fnamerica.com/products/pistols/fnx-45-tactical/
FN-USA	FNX-45 Tactical DA/SA MS FDE/FDE (2) 10-Rnd Night Sight	66982	NO	https://fnamerica.com/products/pistols/fnx-45-tactical/
FN-USA	FN Five-seveN® BLK (2) 20-Rnd Adj Sight	3868929354	NO	https://fnamerica.com/products/pistols/fn-five-seven/
FN-USA	FN Five-seveN® BLK (2) 10-Rnd Adj Sight	3868929355	NO	https://fnamerica.com/products/pistols/fn-five-seven/
FN-USA	FN Five-seveN® FDE (2) 20-Rnd Adj Sight	3868929356	NO	https://fnamerica.com/products/pistols/fn-five-seven/
FN-USA	FN Five-seveN® FDE (2) 10-Rnd Adj Sight	3868929357	NO	https://fnamerica.com/products/pistols/fn-five-seven/
FN-USA	FN Five-seveN Blk 10-Rnd Adj Sight - CA	3868929302	YES	https://fnamerica.com/products/pistols/fn-five-seven/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
FN-USA	FN Five-seveN FDE 10-Rnd Adj Sight - CA	3868929352	YES	https://fnamerica.com/products/pistols/fn-five-seveN/
FN-USA	FN 509 Compact Tactical FDE	8.45737E+11	NO	https://fnamerica.com/products/fn-509-series/fn-509-compact-tactical-fde/
FN-USA	FN 509 Tactical FDE	8.45737E+11	NO	https://fnamerica.com/products/pistols/fn-509-tactical/
FN-USA	FNX-45 Tactical FDE	8.45737E+11	NO	https://fnamerica.com/products/pistols/fnx-45-fde/
Freedom Arms	Model 83 Premium Grade .500 Wyoming Express	904-16	NO	http://www.freedomarms.com/firearms/m83pr/index.html
Freedom Arms	Model 83 Premium Grade .475 Linebaugh	904-10	NO	http://www.freedomarms.com/firearms/m83pr/index.html
Freedom Arms	Model 83 Premium Grade 454 Casull®	904-11	NO	http://www.freedomarms.com/firearms/m83pr/index.html
Freedom Arms	Model 83 Premium Grade .44 Remington Magnum	904-13	NO	http://www.freedomarms.com/firearms/m83pr/index.html
Freedom Arms	Model 83 Premium Grade .41 Remington Magnum	904-17	NO	http://www.freedomarms.com/firearms/m83pr/index.html
Freedom Arms	Model 83 Premium Grade .357 Magnum	904-15	NO	http://www.freedomarms.com/firearms/m83pr/index.html
Freedom Arms	Model 83 Field Grade .500 Wyoming Express	904-36	NO	http://www.freedomarms.com/firearms/m83f/index.html
Freedom Arms	Model 83 Field Grade .475 Linebaugh	904-30	NO	http://www.freedomarms.com/firearms/m83f/index.html
Freedom Arms	Model 83 Field Grade 454 Casull®	904-31	NO	http://www.freedomarms.com/firearms/m83f/index.html
Freedom Arms	Model 83 Field Grade .44 Remington Magnum	904-33	NO	http://www.freedomarms.com/firearms/m83f/index.html
Freedom Arms	Model 83 Field Grade .41 Remington Magnum	904-37	NO	http://www.freedomarms.com/firearms/m83f/index.html
Freedom Arms	Model 83 Field Grade .357 Magnum	904-35	NO	http://www.freedomarms.com/firearms/m83f/index.html
Freedom Arms	Model 83 Field Grade .22 Long Rifle with Match Chambers	904-3470	NO	http://www.freedomarms.com/firearms/m83f/index.html
Freedom Arms	Model 83 Rimfire 22 Long Rifle with Match Grade Chambers.	904-3470	NO	http://www.freedomarms.com/firearms/m83r/index.html
Freedom Arms	Model 83 Silhouette / Competition 44 Remington Mag.	904-3370SM	NO	http://www.freedomarms.com/firearms/m83sc/index.html
Freedom Arms	Model 83 Silhouette / Competition .41 Remington Mag.	904-3770SM	NO	http://www.freedomarms.com/firearms/m83sc/index.html
Freedom Arms	Model 83 Silhouette / Competition .357 Magnum.	904-3570SM	NO	http://www.freedomarms.com/firearms/m83sc/index.html
Freedom Arms	Model 83 Silhouette / Competition .22 Long Rifle	904-3470SM	NO	http://www.freedomarms.com/firearms/m83sc/index.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Freedom Arms	Model 97 Premier Grade .45 Colt (5 shot)	905-11	NO	http://www.freedomarms.com/firearms/m97pr/index.html
Freedom Arms	Model 97 Premier Grade 44 Special (5 shot)	905-13	NO	http://www.freedomarms.com/firearms/m97pr/index.html
Freedom Arms	Model 97 Premier Grade 41 Remington Magnum (6 shot)	905-17	NO	http://www.freedomarms.com/firearms/m97pr/index.html
Freedom Arms	Model 97 Premier Grade .357 Magnum (6 shot)	905-15	NO	http://www.freedomarms.com/firearms/m97pr/index.html
Freedom Arms	Model 97 Premier Grade .327 Federal (6 shot)	905-16	NO	http://www.freedomarms.com/firearms/m97pr/index.html
Freedom Arms	Model 97 Premier Grade 224-32 FA (6 shot)	905-18	NO	http://www.freedomarms.com/firearms/m97pr/index.html
Freedom Arms	Model 97 Premier Grade .22 Long Rifle with Sporting Chambers (6 shot)	905-14	NO	http://www.freedomarms.com/firearms/m97pr/index.html
Freedom Arms	Model 97 Premier Grade .17 HMR (6 shot)	905-12	NO	http://www.freedomarms.com/firearms/m97pr/index.html
Freedom Arms	Model 97 Premier Grade Fixed Sights .45 Colt (5 shot)	905-21	NO	http://www.freedomarms.com/firearms/m97pr/index.html
Freedom Arms	Model 97 Premier Grade Fixed Sights .44 Special (5 shot)	905-23	NO	http://www.freedomarms.com/firearms/m97pr/index.html
Freedom Arms	Model 97 Premier Grade Fixed Sights 357 Magnum (6 shot)	905-25	NO	http://www.freedomarms.com/firearms/m97pr/index.html
Glock	GLOCK 17	not available	YES	https://us.glock.com/en/pistols/g17
Glock	GLOCK 17 Gen5	not available	NO	https://us.glock.com/en/pistols/g17-gen5-fs-us
Glock	G17 Gen5 MOS	not available	NO	https://us.glock.com/en/pistols/g17-gen5-mos-fs
Glock	GLOCK 17L	not available	NO	https://us.glock.com/en/pistols/g17l
Glock	17 OD	not available	YES	https://oag.ca.gov/firearms/handgun/17-od
Glock	17C	not available	YES	https://oag.ca.gov/firearms/handgun/17c
Glock	17RTF2	not available	YES	https://oag.ca.gov/firearms/handgun/17rtf2-black
Glock	G19 Compact	not available	YES	https://us.glock.com/en/pistols/g19
Glock	G19 Gen5 Compact	not available	NO	https://us.glock.com/en/pistols/g19-gen5-fs-us
Glock	G19 Gen5 MOS	not available	NO	https://us.glock.com/en/pistols/g19-gen5-mos-fs
Glock	GLOCK 19X	not available	NO	https://us.glock.com/en/pistols/g19x

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Glock	G17 Gen4 Cut	not available	NO	https://us.glock.com/en/pistols/g17-gen4-cut
Glock	G17P Gen 5	not available	NO	https://us.glock.com/en/pistols/g17-p-gen5-fs-us
Glock	19 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/19-od
Glock	19C / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/19c
Glock	G19 Gen4 Cut	not available	NO	https://us.glock.com/en/pistols/g19-gen4-cut
Glock	G20	not available	YES	https://oag.ca.gov/firearms/handgun/20
Glock	G20 Gen 4	not available	NO	https://us.glock.com/en/pistols/g20-gen4
Glock	G20 SF Standard	not available	YES	https://us.glock.com/en/pistols/g20-sf
Glock	20 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/20-od
Glock	20C / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/20sf-black
Glock	G21 Gen 4 Standard	not available	NO	https://us.glock.com/en/pistols/g21-gen4
Glock	G21 SF Standard	not available	YES	https://us.glock.com/en/pistols/g21-sf
Glock	21 / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/21
Glock	21 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/21-od
Glock	21C / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/21c
Glock	G22 Gen 5	not available	NO	https://us.glock.com/en/pistols/g22-gen5
Glock	G22 Gen 5 MOS	not available	NO	https://us.glock.com/en/pistols/g22-gen5-mos
Glock	G22 Standard	not available	YES	https://us.glock.com/en/pistols/g22
Glock	G22 Cut Standard	not available	YES	https://us.glock.com/en/pistols/g22-cutaway
Glock	G22P Standard	not available	NO	https://us.glock.com/en/pistols/g22p
Glock	22 - California Department of Corrections / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/22-california-department-corrections
Glock	22 - FBI 100 Yr. Commemorative (Blk) / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/22-fbi-100-yr-commemorative-blk

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Glock	22 OD / Steel, Polymer	not available	YES	https://oaq.ca.gov/firearms/handgun/22-od
Glock	22RTF2 (Black) / Steel, Polymer	not available	YES	https://oaq.ca.gov/firearms/handgun/22rtf2-black
Glock	G23 Compact	not available	NO	https://us.glock.com/en/pistols/g23
Glock	G23 Gen 5 Compact	not available	NO	https://us.glock.com/en/pistols/g23-gen5
Glock	G23 Gen 5 MOS Compact	not available	NO	https://us.glock.com/en/pistols/g23-gen5-mos
Glock	G23 Cut Compact	not available	YES	https://us.glock.com/en/pistols/g23-cutaway
Glock	G23P Compact	not available	NO	https://us.glock.com/en/pistols/g23p
Glock	23 / Steel, Polymer	not available	YES	https://oaq.ca.gov/firearms/handgun/23
Glock	23 OD / Steel, Polymer	not available	YES	https://oaq.ca.gov/firearms/handgun/23-od
Glock	G24 Long Slide	not available	NO	https://us.glock.com/en/pistols/g24
Glock	G26 Cut Subcompact	not available	NO	https://us.glock.com/en/pistols/g26-cut
Glock	G26 Subcompact	not available	NO	https://us.glock.com/en/pistols/g26
Glock	G26 Gen5 Subcompact	not available	NO	https://us.glock.com/en/pistols/g26-gen5-fs-us
Glock	26 / Steel, Polymer	not available	YES	https://oaq.ca.gov/firearms/handgun/26
Glock	26 OD / Steel, Polymer	not available	YES	https://oaq.ca.gov/firearms/handgun/26-od
Glock	G27 Subcompact	not available	NO	https://us.glock.com/en/pistols/g27
Glock	G27 Gen 5 Subcompact	not available	NO	https://us.glock.com/en/pistols/g27-gen5
Glock	27 / Steel, Polymer	not available	YES	https://oaq.ca.gov/firearms/handgun/27
Glock	27 OD / Steel, Polymer	not available	YES	https://oaq.ca.gov/firearms/handgun/27-od
Glock	G29 Gen 4 Subcompact	not available	NO	https://us.glock.com/en/pistols/g29-gen4
Glock	G29 SF Subcompact	not available	YES	https://us.glock.com/en/pistols/g29-sf
Glock	29 / Steel, Polymer		YES	https://oaq.ca.gov/firearms/handgun/29

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Glock	29 OD / Steel, Polymer		YES	https://oag.ca.gov/firearms/handgun/29-od
Glock	G30 Gen4 Subcompact	not available	NO	https://us.glock.com/en/pistols/g30-gen4
Glock	G30S Subcompact	not available	NO	https://us.glock.com/en/pistols/g30s
Glock	G30 SF Subcompact	not available	YES	https://us.glock.com/en/pistols/g30-sf
Glock	30 / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/30
Glock	30 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/30-od
Glock	G31 Standard	not available	YES	https://us.glock.com/en/pistols/g31
Glock	G31 Gen 4 Standard	not available	NO	https://us.glock.com/en/pistols/g31-gen4
Glock	31 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/31-od
Glock	31C / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/31c
Glock	G32 Compact	not available	YES	https://us.glock.com/en/pistols/g32
Glock	G32 Gen4 Compact	not available	NO	https://us.glock.com/en/pistols/g32-gen4
Glock	32 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/32-od
Glock	32C / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/32c
Glock	G33 Subcompact	not available	YES	https://us.glock.com/en/pistols/g33
Glock	G33 Gen 4 Subcompact	not available	NO	https://us.glock.com/en/pistols/g33-gen4
Glock	33 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/33-od
Glock	G34 Gen5 MOS Competition	not available	NO	https://us.glock.com/en/pistols/g34-gen5-mos-fs
Glock	G34 Competition	not available	YES	https://us.glock.com/en/pistols/g34
Glock	34 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/34-od
Glock	G35 Competition	not available	YES	https://us.glock.com/en/pistols/g35
Glock	35 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/35-od

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Glock	G36 Subcompact	not available	YES	https://us.glock.com/en/pistols/g36
Glock	36 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/36-od
Glock	G37 Standard	not available	NO	https://us.glock.com/en/pistols/g37
Glock	G-37 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/g-37-od
Glock	G38 Compact	not available	YES	https://us.glock.com/en/pistols/g38
Glock	38 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/38-od
Glock	G39 Subcompact	not available	YES	https://us.glock.com/en/pistols/g39
Glock	39 OD / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/39-od
Glock	G40 Gen 4 MOS Long Slide	not available	NO	https://us.glock.com/en/pistols/g40-gen4-mos
Glock	G41 Gen4 Competition	not available	NO	https://us.glock.com/en/pistols/g41-gen4
Glock	G41 Gen4 MOS Competition	not available	NO	https://us.glock.com/en/pistols/g41-gen4-mos
Glock	G43X Black Subcompact	not available	NO	https://us.glock.com/en/pistols/g43x-us
Glock	G43X MOS Subcompact	not available	NO	https://us.glock.com/en/pistols/g43x-mos
Glock	G43 Subcompact	not available	NO	https://us.glock.com/en/pistols/g43
Glock	G43X Black Subcompact	not available	NO	https://us.glock.com/en/pistols/g43x-us
Glock	G43X MOS Subcompact	not available	NO	https://us.glock.com/en/pistols/g43x-mos
Glock	G44 Compact	not available	NO	https://us.glock.com/en/pistols/g44
Glock	G45 Compact	not available	NO	https://us.glock.com/en/pistols/g45
Glock	G45 MOS Compact	not available	NO	https://us.glock.com/en/pistols/g45-mos
Glock	G48 Black Compact	not available	NO	https://us.glock.com/en/pistols/g48-us
Glock	G48 MOS Compact	not available	NO	https://us.glock.com/en/pistols/g48-mos
Glock	G45P Compact	not available	NO	https://us.glock.com/en/pistols/g45-p

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Glock	G45 Compact	not available	NO	https://us.glock.com/en/pistols/g45
Glock	G45 MOS Compact	not available	NO	https://us.glock.com/en/pistols/g45-mos
Glock	G45P Compact	not available	NO	https://us.glock.com/en/pistols/g45-p
Glock	G48 Black Compact	not available	NO	https://us.glock.com/en/pistols/g48-us
Glock	G48 MOS Compact	not available	NO	https://us.glock.com/en/pistols/g48-mos
Heckler & Koch	VP9SK	81000447	NO	https://hk-usa.com/hk-models/vp9-sk/
Heckler & Koch	VP9SK, with night sights	81000290	NO	https://hk-usa.com/hk-models/vp9-sk/
Heckler & Koch	VP9 Tactical OR	81000625	NO	https://hk-usa.com/hk-models/vp9-sk/
Heckler & Koch	VP9SK	6.4223E+11	NO	https://hk-usa.com/hk-models/vp9-sk/
Heckler & Koch	VP9SK with night sights	6.4223E+11	NO	https://hk-usa.com/hk-models/vp9/
Heckler & Koch	VP40	81000241	NO	https://hk-usa.com/hk-models/vp40/
Heckler & Koch	VP40 with night sights	81000242	NO	https://hk-usa.com/hk-models/vp40/
Heckler & Koch	P30SK P30SK, Subcompact, (V1) "light" LEM DAO	81000297	NO	https://hk-usa.com/hk-models/p30sk/
Heckler & Koch	P30SK P30SK, Subcompact, (V3) DA/SA	81000299	NO	https://hk-usa.com/hk-models/p30sk/
Heckler & Koch	P30SKS, Subcompact, (V3) DA/SA	81000545	NO	https://hk-usa.com/hk-models/p30sk/
Heckler & Koch	P30SK, Subcompact, (V1) "light" LEM DAO,	81000298	NO	https://hk-usa.com/hk-models/p30sk/
Heckler & Koch	P30SK, Subcompact, (V3) DA/SA,	81000544	NO	https://hk-usa.com/hk-models/p30sk/
Heckler & Koch	P30SKS, Subcompact, (V3) DA/SA with night sights	81000546	NO	https://hk-usa.com/hk-models/p30sk/
Heckler & Koch	HK45 (V1) DA/SA	81000026	NO	https://hk-usa.com/hk-models/hk45/
Heckler & Koch	HK45 (V1) DA/SA with night sights	81000027	NO	https://hk-usa.com/hk-models/hk45/
Heckler & Koch	HK45 (V7) LEM DAO	81000028	NO	https://hk-usa.com/hk-models/hk45/
Heckler & Koch	HK45 (V7) LEM DAO with night sights	81000029	NO	https://hk-usa.com/hk-models/hk45/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Heckler & Koch	P30, 9mm	not available	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30 (V1) "light" LEM DAO,	81000103	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30 (V1) "light" LEM DAO with night sights	81000104	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30 (V3) DA/SA, rear decocking button	81000107	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30S (V3) DA/SA, ambidextrous safety	81000113	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30S (V3) DA/SA, ambidextrous safety with night sights	810001125	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30, .40 Cal.	not available	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30S (V3) DA/SA	81000127	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30S (V3) DA/SA with night sights	81000128	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30L 9mm, Long Slide (V1) "light" LEM DAO	81000115	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30L 9mm, Long Slide (V1) "light" LEM DAO with night sights	81000116	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30L 9mm, Long Slide (V3) DA/SA, rear decocking button	81000119	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30L, Long Slide (V3) DA/SA, rear decocking button	81000122	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30LS 9mm, Long Slide (V3) DA/SA, ambidextrous safety	81000123	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30LS, Long Slide (V3) DA/SA, ambi safety/rear decocking button	81000124	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30LS .40 cal, Long Slide (V3) DA/SA	81000131	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P30LS .40 cal, Long Slide (V3) DA/SA with night sights	81000132	NO	https://hk-usa.com/hk-models/p30/
Heckler & Koch	P2000 (V2) LEM DAO,	81000037	NO	https://hk-usa.com/hk-models/p2000/
Heckler & Koch	P2000 (V2) LEM DAO with night sights	81000040	NO	https://hk-usa.com/hk-models/p2000/
Heckler & Koch	P2000 (V3) DA/SA	81000041	YES	https://hk-usa.com/hk-models/p2000/
Heckler & Koch	P2000 (V3) DA/SA with night sights	81000044	YES	https://hk-usa.com/hk-models/p2000/
Heckler & Koch	P2000 SK-V3 / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/p2000-sk-v3-0

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Heckler & Koch	P2000 (V2) LEM DAO	81000045	NO	https://hk-usa.com/hk-models/p2000/
Heckler & Koch	P2000 (V2) LEM DAO with night sights	81000046	NO	https://hk-usa.com/hk-models/p2000/
Heckler & Koch	P2000 (V3) DA/SA, rear decocking button	81000049	YES	https://hk-usa.com/hk-models/p2000/
Heckler & Koch	P2000 (V3) DA/SA, rear decocking button with night sights	81000052	YES	https://hk-usa.com/hk-models/p2000/
Heckler & Koch	P2000-V3 (OD Green) / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/p2000-v3
Heckler & Koch	P2000 SK (V2) LEM DAO	81000053	YES	https://hk-usa.com/hk-models/p2000-sk/
Heckler & Koch	P2000 SK (V2) LEM DAO with night sights	81000054	YES	https://hk-usa.com/hk-models/p2000-sk/
Heckler & Koch	P2000 SK (V3) DA/SA, rear decocking button	81000055	NO	https://hk-usa.com/hk-models/p2000-sk/
Heckler & Koch	P2000 SK (V3) DA/SA, rear decocking button with night sights	81000056	NO	https://hk-usa.com/hk-models/p2000-sk/
Heckler & Koch	P2000 SK (V2) LEM DAO	81000057	NO	https://hk-usa.com/hk-models/p2000-sk/
Heckler & Koch	P2000 SK (V2) LEM DAO with night sights	81000058	NO	https://hk-usa.com/hk-models/p2000-sk/
Heckler & Koch	P2000 SK (V3) DA/SA, rear decocking button	81000059	NO	https://hk-usa.com/hk-models/p2000-sk/
Heckler & Koch	P2000 SK (V3) DA/SA, rear decocking button with night sights	81000060	NO	https://hk-usa.com/hk-models/p2000-sk/
Heckler & Koch	P2000SK-V2 / Steel, Polymer	not available	NO	https://oag.ca.gov/firearms/handgun/p2000skv2-0
Heckler & Koch	HK45 Tactical (V1) DA/SA	81000030	NO	https://hk-usa.com/hk-models/hk45-tactical/
Heckler & Koch	HK45 Tactical (V7) LEM DAO	81000032	NO	https://hk-usa.com/hk-models/hk45-tactical/
Heckler & Koch	HK45 Compact (V1) DA/SA	81000018	NO	https://hk-usa.com/hk-models/hk45-compact/
Heckler & Koch	HK45 Compact (V1) DA/SA with night sights	81000019	NO	https://hk-usa.com/hk-models/hk45-compact/
Heckler & Koch	HK45 Compact (V7) LEM DAO	81000020	NO	https://hk-usa.com/hk-models/hk45-compact/
Heckler & Koch	HK45 Compact (V7) LEM DAO	81000021	NO	https://hk-usa.com/hk-models/hk45-compact/
Heckler & Koch	HK45 Compact Tactical (V1) DA/SA	81000022	NO	https://hk-usa.com/hk-models/hk45-compact-tactical/
Heckler & Koch	HK45 Compact Tactical (V7) DAO LEM	81000024	NO	https://hk-usa.com/hk-models/hk45-compact-tactical/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Heckler & Koch	Mark 23 DA/SA	81000078	NO	https://hk-usa.com/hk-models/mark-23/
Heckler & Koch	USP9 (V1) DA/SA	81000307	NO	https://hk-usa.com/hk-models/usp/
Heckler & Koch	USP9 (V1) DA/SA with night sights	81000308	NO	https://hk-usa.com/hk-models/usp/
Heckler & Koch	USP9 (V7) LEM DAO	81000311	NO	https://hk-usa.com/hk-models/usp/
Heckler & Koch	USP40 (V1) DA/SA	81000314	YES	https://hk-usa.com/hk-models/usp/
Heckler & Koch	USP40 (V1) DA/SA with night sights	81000315	YES	https://hk-usa.com/hk-models/usp/
Heckler & Koch	USP40 (V7) LEM DAO	81000318	YES	https://hk-usa.com/hk-models/usp/
Heckler & Koch	USP40 (V7) LEM DAO with night sights	81000319	YES	https://hk-usa.com/hk-models/usp/
Heckler & Koch	USP40C-LEM / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/usp40c-lem
Heckler & Koch	USP45 (V1) DA/SA	81000322	YES	https://hk-usa.com/hk-models/usp/
Heckler & Koch	USP45 (V1) DA/SA with night sights	81000323	YES	https://hk-usa.com/hk-models/usp/
Heckler & Koch	USP45 (V7) LEM DAO	81000326	NO	https://hk-usa.com/hk-models/usp/
Heckler & Koch	USP45 (V7) LEM DAO with night sights	81000327	NO	https://hk-usa.com/hk-models/usp/
Heckler & Koch	USP9 Compact (V1) DA/SA	81000307	YES	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP9 Compact (V1) DA/SA with night sights	81000308	YES	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	Comp USP9 V1 (Grey Frame) / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/comp-usp9-v1-grey-frame
Heckler & Koch	USP45, V1 (Grey Frame) / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/usp45-v1-grey-frame
Heckler & Koch	USP9 (V7) LEM DAO,	81000311	NO	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP40 (V1) DA/SA	81000314	NO	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP40 (V1) DA/SA with night sights	81000317	NO	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP40 (V7) LEM DAO with night sights	6.4223E+11	NO	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP9 V1 (FDE Frame) / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/handgun/usp9-v1-fde-frame

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Heckler & Koch	USP45 (V1) DA/SA	81000322	YES	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP45 (V1) DA/SA with night sights	81000323	YES	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP45 (V7) LEM DAO	81000326	NO	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP45 (V7) LEM DAO with night sights	81000327	NO	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP9 Compact (V1) DA/SA	81000329	YES	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP9 Compact (V1) DA/SA with night sights	81000330	YES	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP9 Compact (V7) LEM DAO	81000333	NO	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP9 Compact (V7) LEM DAO with night sights	81000334	NO	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP9, V1 / Steel, Polymer	not available	YES	https://oag.ca.gov/firearms/certified-handguns/search?make=151014
Heckler & Koch	USP40 Compact (V1) DA/SA	81000336	YES	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP40 Compact (V1) DA/S with night sights	81000337	YES	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP40 Compact (V7) LEM DAO	81000341	NO	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP40 Compact (V7) LEM DAO with night sights	81000548	NO	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP45 Compact (V1) DA/SA	81000343	YES	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP45 Compact (V1) DA/SA with night sights	81000344	YES	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP45 Compact (V7) LEM DAO	81000345	NO	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP45 Compact (V7) LEM DAO with night sights	81000346	NO	https://hk-usa.com/hk-models/usp-compact/
Heckler & Koch	USP9 Tactical (V1) DA/SA	81000347	NO	https://hk-usa.com/hk-models/usp-tactical/
Heckler & Koch	USP9 Tactical (V1) DA/SA with night sights	81000348	NO	https://hk-usa.com/hk-models/usp-tactical/
Heckler & Koch	USP45 Tactical (V1) DA/SA	81000350	NO	https://hk-usa.com/hk-models/usp-tactical/
Heckler & Koch	USP45 Tactical (V1) DA/SA with night sights	81000351	NO	https://hk-usa.com/hk-models/usp-tactical/
Heritage Manufacturing Inc.	16" Rough Rider® .22 LR Simulated Case Hardened Joker Adjustable Sights	RR22CH16ASJK1	Exempt	https://heritagemfg.com/small-bore/16-rough-rider/47-16-rough-rider-22-lr-simulated-case-hardened-joker-adjustable-sights

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Heritage Manufacturing Inc.	16" Rough Rider® .22 LR Black Standard Honor Betsy Ross	RR22B16-HBR	Exempt	https://heritagemfg.com/small-bore/16-rough-rider/16-rough-rider-22-lr-black-standard-honor-betsy-ross
Heritage Manufacturing Inc.	16" Rough Rider® 22 LR Black 6 Rounds Cocobolo Grips	RR22B16	Exempt	https://heritagemfg.com/small-bore/16-rough-rider/42-16-rough-rider-22-lr-black-6-rounds-cocobolo-grips
Heritage Manufacturing Inc.	16" Rough Rider® 22 LR / 22 WMR Black 6 Rounds Cocobolo Grips	RR22MB16	Exempt	https://heritagemfg.com/small-bore/16-rough-rider/43-16-rough-rider-22-lr-22-wmr-black-6-rounds-cocobolo-grips
Heritage Manufacturing Inc.	16" Rough Rider® 22 LR / 22 WMR Black Standard Cocobolo Adjustable Sights	RR22MB16AS	Exempt	https://heritagemfg.com/small-bore/16-rough-rider/44-16-rough-rider-22-lr-black-standard-cocobolo-adjustable-sights
Heritage Manufacturing Inc.	9" Rough Rider® 22 LR / 22 WMR Black Standard Cocobolo Adjustable Sights	RR22MB9AS	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/101-9-rough-rider-22-lr-22-wmr-black-standard-cocobolo-adjustable-sights
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR / 22 WMR Black Satin Camo Laminata	RR22MBS6	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/98-6-5-rough-rider-22-lr-22-wmr-black-satin-steel-camo-laminata
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Simulated Case Hardened Camo Laminata	RR22CH6	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/97-6-5-rough-rider-22-lr-simulated-case-hardened-camo-laminata
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Black Standard USA Flag 02	RR22B6-US02	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/96-6-5-rough-rider-22-lr-black-standard-usa-flag-02
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Black Standard USA Flag 01	RR22B6-US01	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/95-6-5-rough-rider-22-lr-black-standard-usa-flag-01
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Black Standard Coral Snake	RR22B6-SNK2	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/94-6-5-rough-rider-22-lr-black-standard-coral-snake
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Black Standard Ace in the Hole	RR22B6-PINUP5	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/93-6-5-rough-rider-22-lr-black-standard-ace-in-the-hole
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Black Standard My Belle	RR22B6-PINUP4	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/92-6-5-rough-rider-22-lr-black-standard-my-belle
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Black Standard Miss B Hevin	RR22B6-PINUP3	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/91-6-5-rough-rider-22-lr-black-standard-miss-b-hevin
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Black Standard Gold USA Flag	RR22B6GOLDUSA	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/90-6-5-rough-rider-22-lr-black-standard-gold-usa-flag
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR / 22 WMR Black Standard Cocobolo Adjustable Sights	RR22999MB6AS	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/89-6-5-rough-rider-22-lr-22-wmr-black-standard-cocobolo-adjustable-sights-2
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR / 22 WMR Simulated Case Hardened Camo Laminata	RR22MCH6	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/85-6-5-rough-rider-22-lr-22-wmr-black-satin-camo-laminata
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR / 22 WMR Simulated Case Hardened Camo Laminata	RR22MCH4	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/84-4-75-rough-rider-22-lr-22-wmr-simulated-case-hardened-camo-laminata
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR / 22 WMR Steel Frame Black Satin Camo Laminata	SRR22MBS4	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/82-4-75-rough-rider-22-lr-22-wmr-steel-frame-black-satin-camo-laminata
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR / 22 WMR Black Satin Camo Laminata	RR22MBS4	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/81-4-75-rough-rider-22-lr-22-wmr-black-satin-camo-laminata
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Black Standard USA Flag	RR22B4USFLAG	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/79-4-75-rough-rider-22-lr-black-standard-usa-flag-2
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Black Standard My Belle	RR22B4-PINUP4	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/77-4-75-rough-rider-22-lr-black-standard-my-belle
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Black Standard Miss B Hevin	RR22B4-PINUP3	Exempt	https://heritagemfg.com/small-bore/6-shot-rough-rider/76-4-75-rough-rider-22-lr-black-standard-miss-b-hevin

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Black Standard Gold USA Flag	RR22B4GOLDUSA	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/75-4-75-rough-rider-22-lr-black-standard-gold-usa-flag
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Black Standard Coral Snake	RR22B4-SNK2	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/74-4-75-rough-rider-22-lr-black-standard-coral-snake
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Black Standard Ace in the Hole	RR22B4-PINUP5	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/74-4-75-rough-rider-22-lr-black-standard-ace-in-the-hole
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR / 22 WMR Black Standard White Pearl	RR22MB6PRL	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/68-6-5-rough-rider-22-lr-22-wmr-black-standard-white-pearl
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR / 22 WMR Black Standard Cocobolo Adjustable Sights	RR22MB6AS	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/67-6-5-rough-rider-22-lr-22-wmr-black-standard-cocobolo-adjustable-sights
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR / 22 WMR Black Standard Cocobolo Wood Box	RR22MB6BX	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/66-6-5-rough-rider-22-lr-22-wmr-black-standard-cocobolo-wood-box
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR / 22 WMR Black Standard Cocobolo	RR22MB6	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/64-6-5-rough-rider-22-lr-22-wmr-black-standard-cocobolo
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Black Standard Brown Pearl	RR22B6BRPRL	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/63-6-5-rough-rider-22-lr-black-standard-brown-pearl
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Black Standard Black Pearl	RR22B6BLKPRL	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/62-6-5-rough-rider-22-lr-black-standard-black-pearl
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR / 22 WMR Black Standard Cocobolo	RR22MB4	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/61-4-75-rough-rider-22-lr-22-wmr-black-standard-cocobolo
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Simulated Case Hardened Camo Laminate	RR22CH4	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/60-4-75-rough-rider-22-lr-simulated-case-hardened-camo-laminate
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Black Standard Honor Betsy Ross	RR22B4-HBR	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/59-4-75-rough-rider-22-lr-black-standard-honor-betsy-ross
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Black Standard Cocobolo	RR22B4	Exempt	https://heritagemfg.com/small-bone/6-shot-rough-rider/57-4-75-rough-rider-22-lr-black-standard-cocobolo
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR / 22 WMR Black Standard Cocobolo	RR22999MB6	Exempt	https://heritagemfg.com/small-bone/9-shot-rough-rider/88-6-5-rough-rider-22-lr-22-wmr-black-standard-cocobolo
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Simulated Case Hardened Cocobolo	RR22999CH6	Exempt	https://heritagemfg.com/small-bone/9-shot-rough-rider/87-6-5-rough-rider-22-lr-simulated-case-hardened-cocobolo
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Black Standard Black Pearl	RR22999B6BP	Exempt	https://heritagemfg.com/small-bone/9-shot-rough-rider/86-6-5-rough-rider-22-lr-black-standard-black-pearl
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR / 22 WMR Black Standard Cocobolo	RR22999MB4	Exempt	https://heritagemfg.com/small-bone/9-shot-rough-rider/83-4-75-rough-rider-22-lr-22-wmr-black-standard-cocobolo
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Simulated Case Hardened Cocobolo	RR22999CH4	Exempt	https://heritagemfg.com/small-bone/9-shot-rough-rider/80-4-75-rough-rider-22-lr-simulated-case-hardened-cocobolo
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Black Standard Black Pearl	RR22999B4BP	Exempt	https://heritagemfg.com/small-bone/9-shot-rough-rider/73-4-75-rough-rider-22-lr-black-standard-black-pearl
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR / 22 WMR Black Standard Cocobolo	RR22MB4BH	Exempt	https://heritagemfg.com/small-bone/bird-head-rough-rider/53-4-75-rough-rider-22-lr-22-wmr-black-standard-cocobolo
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR / 22 WMR Black Standard Black Pearl	RR22MB4BHPRL	Exempt	https://heritagemfg.com/small-bone/bird-head-rough-rider/52-4-75-rough-rider-22-lr-22-wmr-black-standard-black-pearl
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Black Standard Black Pearl	RR22B4BHPRL	Exempt	https://heritagemfg.com/small-bone/bird-head-rough-rider/51-4-75-rough-rider-22-lr-black-standard-black-pearl

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Heritage Manufacturing Inc.	3.5" Rough Rider® 22 LR / 22 WMR Black Standard White Pearl	RR22MB3BHPRL	Exempt	https://heritagemfg.com/small-bone/bird-head-rough-rider/50-3-5-rough-rider-22-lr-22-wmr-black-standard-white-pearl
Heritage Manufacturing Inc.	3.5" Rough Rider® 22 LR / 22 WMR Black Standard Cocobolo	RR22MB3BH	Exempt	https://heritagemfg.com/small-bone/bird-head-rough-rider/49-3-5-rough-rider-22-lr-22-wmr-black-standard-cocobolo
Heritage Manufacturing Inc.	3.5" Rough Rider® 22 LR / 22 WMR Black Standard Pink Pearl	RR22MB3BHPNK	Exempt	https://heritagemfg.com/small-bone/bird-head-rough-rider/48-3-5-rough-rider-22-lr-22-wmr-black-standard-pink-pearl
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Black Standard Horse Shoe	RR22TT6SHOE	Exempt	https://heritagemfg.com/small-bone/two-tone-rough-rider/71-6-5-rough-rider-22-lr-black-standard-horse-shoe
Heritage Manufacturing Inc.	6.5" Rough Rider® 22 LR Black Standard Black Pearl	RR22TT6LKPRL	Exempt	https://heritagemfg.com/small-bone/two-tone-rough-rider/70-6-5-rough-rider-22-lr-black-standard-black-pearl
Heritage Manufacturing Inc.	4.75" Rough Rider® 22 LR Black Standard Horse Shoe	RR22TT4SHOE	Exempt	https://heritagemfg.com/small-bone/two-tone-rough-rider/69-4-7-5-rough-rider-22-lr-black-standard-horse-shoe
Hi-Point	The YEET CANNON™ G 1	C9 YCG1	NO	http://www.hi-pointfirearms.com/hi-point-handguns/9mm-OGY-C.php
Hi-Point	Model C9 (9mm)	7.52334E+11	YES	http://www.hi-pointfirearms.com/hi-point-handguns/9mm-handgun.php
Hi-Point	CF380 Polymer; Zinc Alloy; 4130 Barrel	7.52334E+11	YES	https://oaq.ca.gov/firearms/handgun/cf380-up/c752334003805
Hi-Point	Model C9 HC (9mm)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/9mm-handgun.php
Hi-Point	Model C9 G (9mm)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/9mm-handgun.php
Hi-Point	Model C9 NYLON (9mm)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/9mm-handgun.php
Hi-Point	Model C9 LLTGM (9mm)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/9mm-handgun.php
Hi-Point	Model C9 HC KNIFE (9mm)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/9mm-handgun.php
Hi-Point	Model C9 HSP (9mm)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/9mm-handgun.php
Hi-Point	Model C9 Camo DD (9mm)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/9mm-handgun.php
Hi-Point	Model C9 Camo PI (9mm)	916 PI	NO	http://www.hi-pointfirearms.com/hi-point-handguns/9mm-handgun.php
Hi-Point	Model C9 Camo WC (9mm)	916 WC	NO	http://www.hi-pointfirearms.com/hi-point-handguns/9mm-handgun.php
Hi-Point	Model JCP 40 (40S&W)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/40sw-handgun.php
Hi-Point	Model JCP 40 LLTGM (40S&W)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/40sw-handgun.php
Hi-Point	Model JCP 40 HC (40S&W)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/40sw-handgun.php
Hi-Point	Model JCP 40 M5X (40S&W)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/40sw-handgun.php

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Hi-Point	Model JCP 40 HSP (40S&W)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/40sw-handgun.php
Hi-Point	Model JCP 40 Camo DD (40S&W)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/40sw-handgun.php
Hi-Point	Model JCP 40 Camo PI (40S&W)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/40sw-handgun.php
Hi-Point	Model JCP 40 Camo WC (40S&W)	7.52334E+11	NO	http://www.hi-pointfirearms.com/hi-point-handguns/40sw-handgun.php
Hi-Point	Model JHP 45 (45ACP)	7.52334E+11	NO	https://www.hi-pointfirearms.com/hi-point-handguns/45acp-handgun.php
Hi-Point	Model JHP 45 LL TGM (45ACP)	7.52334E+11	NO	https://www.hi-pointfirearms.com/hi-point-handguns/45acp-handgun.php
Hi-Point	Model JHP 45 HC (45ACP)	7.52334E+11	NO	https://www.hi-pointfirearms.com/hi-point-handguns/45acp-handgun.php
Hi-Point	Model JHP 45 M5X (45ACP)	7.52334E+11	NO	https://www.hi-pointfirearms.com/hi-point-handguns/45acp-handgun.php
Hi-Point	Model JHP 45 HSP (45ACP)	7.52334E+11	NO	https://www.hi-pointfirearms.com/hi-point-handguns/45acp-handgun.php
Hi-Point	Model JHP 45 Camo PI (45ACP)	34510 WC	NO	https://www.hi-pointfirearms.com/hi-point-handguns/45acp-handgun.php
Hi-Point	Model JHP 45 Camo DD (45ACP)	7.52334E+11	NO	https://www.hi-pointfirearms.com/hi-point-handguns/45acp-handgun.php
Hi-Point	Model CF 380 (380ACP)	CF380	NO	https://www.hi-pointfirearms.com/hi-point-handguns/380acp-handgun.php
Hi-Point	Model CF 380 HC (380ACP)	7.52334E+11	NO	https://www.hi-pointfirearms.com/hi-point-handguns/380acp-handgun.php
Hi-Point	Model CF 380 LL TGM (380ACP)	7.52334E+11	NO	https://www.hi-pointfirearms.com/hi-point-handguns/380acp-handgun.php
Hi-Point	Model CF 380 Comp (380ACP)	7.52334E+11	NO	https://www.hi-pointfirearms.com/hi-point-handguns/380acp-handgun.php
Hi-Point	Model CF 380 HSP (380ACP)	7.52334E+11	NO	https://www.hi-pointfirearms.com/hi-point-handguns/380acp-handgun.php
Hi-Point	Model CF 380 Camo PI (380ACP)	7.52334E+11	NO	https://www.hi-pointfirearms.com/hi-point-handguns/380acp-handgun.php
Hi-Point	Model CF 380 Comp Camo PI (380ACP)	CF380COMP PI	NO	https://www.hi-pointfirearms.com/hi-point-handguns/380acp-handgun.php
Israel Weapon Industries (IWI)	Masada	not available	NO	https://wiw.net/masada/
Israel Weapon Industries (IWI)	JERICO F	not available	NO	https://wiw.net/iwi-hericho-pisto/iericho-f/
Israel Weapon Industries (IWI)	JERICO R	not available	NO	https://wiw.net/iwi-hericho-pisto/iericho-r/
Israel Weapon Industries (IWI)	JERICO FS	not available	NO	https://wiw.net/iwi-hericho-pisto/iericho-fs/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Israel Weapon Industries (IW)	JERICHO RS	not available	NO	https://wi.net/iwi-hericho-pisto/leicho-rs/
Israel Weapon Industries (IW)	JERICHO PL	not available	NO	https://wi.net/iwi-hericho-pisto/leicho-pl/
Israel Weapon Industries (IW)	JERICHO RPL	not available	NO	https://wi.net/iwi-hericho-pisto/leicho-rpl/
Israel Weapon Industries (IW)	JERICHO PSL	not available	NO	https://wi.net/iwi-hericho-pisto/leicho-psl/
Israel Weapon Industries (IW)	JERICHO RP5L	not available	NO	https://wi.net/iwi-hericho-pisto/leicho-rp5l/
Israel Weapon Industries (IW)	JERICHO FBL	not available	NO	https://wi.net/iwi-hericho-pisto/leicho-fbl/
Israel Weapon Industries (IW)	JERICHO RBL	not available	NO	https://wi.net/iwi-hericho-pisto/leicho-rbl/
Ithaca Gun Company	1911 .45 ACP- Hand-Fit-Combat	8.13779E+11	NO	https://ithacaun.com/product/1911-45-acc-carmv-hand-fit/
Ithaca Gun Company	1911 .45 ACP- Pro-Fit-Combat	8.13779E+11	NO	https://ithacaun.com/product/1911-45-acc-carmv-hand-fit/
Ithaca Gun Company	1911 .45 ACP- Pro-Fit-Target	8.13779E+11	NO	https://ithacaun.com/product/1911-45-acc-carmv-hand-fit/
Kahr Arms	25th Anniversary K9 Limited Edition	K9094NC1	NO	https://shopkahrfirearmsgroup.com/25th-anniversary-k9-limited-edition-k9094nc1/
Kahr Arms	CM40, Matte Stainless Slide	CM4043	NO	https://shopkahrfirearmsgroup.com/cm40-cm4043/
Kahr Arms	CM45, Matte Stainless Slide	CM4543	NO	https://shopkahrfirearmsgroup.com/cm45-cm4543/
Kahr Arms	CM9, Kryptek Camo	CM903KRT	NO	https://shopkahrfirearmsgroup.com/cm9-kryptek-camo/
Kahr Arms	CM9, Matte Stainless Slide	CM9093	NO	https://shopkahrfirearmsgroup.com/cm9-cm9093/
Kahr Arms	CM9, Matte Stainless Slide w/ Front Night Sight	CM9093N	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-cm9-w-front-night-sight.asp
Kahr Arms	CT380	CT3833	NO	https://shopkahrfirearmsgroup.com/ct380-ct3833/
Kahr Arms	CT380 Gold	CT3833CG	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-ct380-gold.asp
Kahr Arms	CT380 Tungsten	CT3833TU	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-ct380-tungsten.asp
Kahr Arms	CT380 Tungsten with Grip Glove	CT3833TU3	NO	https://shopkahrfirearmsgroup.com/ct380-tungsten-with-grip-glove/
Kahr Arms	CT40	CT4043	NO	https://shopkahrfirearmsgroup.com/ct40-ct4043/
Kahr Arms	CT45, Matte Stainless Slide	CT4543	NO	https://shopkahrfirearmsgroup.com/ct45-c4543/

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Kahr Arms	CT9, Kryptek Camo	CT9093KRT	NO	https://shopkahrfirearmsgroup.com/ct9-kryptek-camo/
Kahr Arms	CT9, Matte Stainless Slide	CT9093	NO	https://shopkahrfirearmsgroup.com/ct9-c9093/
Kahr Arms	CT9, Matte Stainless Slide w/ Front Night Sight	CT9093N	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-ct9-w-front-night-sight.asp
Kahr Arms	CW380, Kryptek Camo	CW3833KRT	NO	https://shopkahrfirearmsgroup.com/cw380-kryptek-camo/
Kahr Arms	CW380, Matte Stainless	CW3833	NO	https://shopkahrfirearmsgroup.com/cw380-cw3833/
Kahr Arms	CW380, Matte Stainless Slide w/ Front Night Sight	CW3833N	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-cw380-w-front-night-sight.asp
Kahr Arms	CW40	CW4043	NO	https://shopkahrfirearmsgroup.com/cw40-cw4043/
Kahr Arms	CW40 Burnt Bronze	CW4043BB	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-cw40-burnt-bronze.asp
Kahr Arms	CW45, Matte Stainless Slide	CW4543	NO	https://shopkahrfirearmsgroup.com/cw45-cw4543/
Kahr Arms	CW9, Black Carbon Fiber, CA Approved	CW9093BCF	YES	https://shopkahrfirearmsgroup.com/cw9-black-carbon-fiber/
Kahr Arms	CW9, Burnt Bronze, CA Approved	CW9093BB	YES	https://shopkahrfirearmsgroup.com/pistols/kahr-cw9-burnt-bronze.asp
Kahr Arms	CW9, Kryptek Camo, CA Approved	CW9093KRT	YES	https://shopkahrfirearmsgroup.com/cw9-kryptek-camo/
Kahr Arms	CW9, Matte Stainless Slide w/ Front Night Sight, CA Approved	CW9093N	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-cw9-w-front-night-sight.asp
Kahr Arms	CW9, Matte Stainless Slide, CA Approved	CW9093	NO	https://shopkahrfirearmsgroup.com/cw9-cw9093/
Kahr Arms	K40, Elite, Polished Stainless Steel Slide w/ Night Sights, CA Approved	K4048NA	YES	https://shopkahrfirearmsgroup.com/pistols/kahr-k40-elite-w-night-sights.asp
Kahr Arms	K40, Elite, Polished Stainless Steel Slide, CA Approved	K4048A	YES	https://shopkahrfirearmsgroup.com/pistols/kahr-k40-elite.asp
Kahr Arms	K40, Matte Blackened Stainless Steel Slide	K4044	NO	https://shopkahrfirearmsgroup.com/k40-black-k4044/
Kahr Arms	K40, Matte Blackened Stainless Steel Slide w/ Night Sights	K4044N	NO	https://shopkahrfirearmsgroup.com/k40-black-w-night-sights-k4044n/
Kahr Arms	K40, Matte Stainless Steel Slide w/ Night Sights, CA Approved	K4043NA	YES	https://shopkahrfirearmsgroup.com/pistols/kahr-k40-w-night-sights.asp
Kahr Arms	K40, Matte Stainless Steel Slide, CA Approved	K4043A	YES	https://shopkahrfirearmsgroup.com/pistols/kahr-k40.asp
Kahr Arms	K9, Elite, Polished Stainless Steel	K9098A	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-k9-elite.asp
Kahr Arms	K9, Elite, Polished Stainless Steel Slide w/ Night Sights	K9098NA	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-k9-elite-w-night-sights.asp

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Kahr Arms	K9, Matte Blackened Stainless Steel Slide	K9094	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-k9-black.asp
Kahr Arms	K9, Matte Blackened Stainless Steel Slide w/ Night Sights	K9094	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-k9-black-w-night-sights.asp
Kahr Arms	K9, Matte Stainless Steel Slide	K9093A	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-k9.asp
Kahr Arms	K9, Matte Stainless Steel Slide w/ Night Sights	K9093NA	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-k9-w-night-sights.asp
Kahr Arms	Mk40	M4043A	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-mk40.asp
Kahr Arms	Mk40 Elite	M4048A	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-mk40-elite.asp
Kahr Arms	Mk40 Elite w/ Night Sights	M4048NA	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-mk40-elite-w-night-sights.asp
Kahr Arms	Mk40 w/ Night Sights	M4043NA	NO	https://shopkahrfirearmsgroup.com/mk40-w-night-sights-m4043n/
Kahr Arms	Mk40, Matte Stainless Steel Slide w/ Night Sights, CA Approved	M4043NA	YES	https://shopkahrfirearmsgroup.com/copy-of-mk40-matte-stainless-steel-slide-w-night-sights-ca-approved/
Kahr Arms	Mk40, Elite, Polished Stainless Steel Slide w/ Night Sights, CA Approved	M4048NA	YES	https://shopkahrfirearmsgroup.com/copy-of-mk40-elite-polished-stainless-steel-slide-w-night-sights-ca-approved/
Kahr Arms	Mk40, Elite, Polished Stainless Steel Slide, CA Approved	M4048A	YES	https://shopkahrfirearmsgroup.com/copy-of-mk40-elite-polished-stainless-steel-slide-ca-approved/
Kahr Arms	Mk40, Matte Stainless Steel Slide, CA Approved	M4043A	YES	https://shopkahrfirearmsgroup.com/copy-of-mk40-elite-polished-stainless-steel-slide-ca-approved/
Kahr Arms	Mk9 Elite w/ Night Sights	M4048NA	NO	https://shopkahrfirearmsgroup.com/copy-of-mk40-elite-polished-stainless-steel-slide-w-night-sights-ca-approved/
Kahr Arms	Mk9 w/ Night Sights	M9098N	NO	https://shopkahrfirearmsgroup.com/mk9-elite-w-night-sights-m9098n/
Kahr Arms	Mk9, Elite, Polished Stainless Steel Slide w/ Night Sights, CA Approved	M9098NA	YES	https://shopkahrfirearmsgroup.com/copy-of-mk9-elite-polished-stainless-steel-slide-w-night-sights-ca-approved/
Kahr Arms	Mk9, Elite, Polished Stainless Steel	M9098A	NO	https://shopkahrfirearmsgroup.com/copy-of-mk9-elite-polished-stainless-steel-ca-approved/
Kahr Arms	Mk9, Matte Stainless Slide w/ Night Sights, CA Approved	M9093NA	YES	https://shopkahrfirearmsgroup.com/copy-of-mk9-matte-stainless-slide-w-night-sights-ca-approved/
Kahr Arms	Mk9, Matte Stainless Slide, CA Approved	M9093A	YES	https://shopkahrfirearmsgroup.com/copy-of-mk9-matte-stainless-slide-ca-approved/
Kahr Arms	P380, Matte Blackened Stainless Slide w/ Night Sights	KP3834N	NO	https://shopkahrfirearmsgroup.com/p380-black-w-night-sights-kp3834n/
Kahr Arms	P380, Matte Stainless Slide w/ LCI and Night Sights, CA Approved	KP38233N	YES	https://shopkahrfirearmsgroup.com/p380-w-lci-kp38233/
Kahr Arms	P40, Matte Blackened Stainless Slide w/ Night Sights, CA Approved	KP4044NA	YES	https://shopkahrfirearmsgroup.com/pistols/kahr-p40-black-w-night-sights.asp
Kahr Arms	P40, Matte Stainless Slide w/ Night Sights, CA Approved	KP4043NA	YES	https://shopkahrfirearmsgroup.com/pistols/kahr-p40-w-night-sights.asp

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Kahr Arms	P45 Black	KP4544	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-p45-black.asp
Kahr Arms	P45 Black w/ Night Sights	KP4544N	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-p45-black-w-night-sights.asp
Kahr Arms	P45 w/ Night Sights	KP4543N	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-p45-w-night-sights.asp
Kahr Arms	P45, Blackened Stainless Slide w/ Night Sights, CA Approved	KP4544N	YES	https://shopkahrfirearmsgroup.com/copy-of-p45-blackened-stainless-slide-w-night-sights-ca-approved/
Kahr Arms	P45, Matte Stainless Slide w/ Night Sights, CA Approved	KP4543N	YES	https://shopkahrfirearmsgroup.com/copy-of-p45-matte-stainless-slide-w-night-sights-ca-approved/
Kahr Arms	P9	KP9093A	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-p9.asp
Kahr Arms	P9 Black w/ Night Sights	KP9094NA	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-p9-black-w-night-sights.asp
Kahr Arms	P9 w/ External Safety & LCI	KP9193	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-p9-w-external-safety-and-lci.asp
Kahr Arms	P9 w/ Night Sights	KP9094NA	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-p9-black-w-night-sights.asp
Kahr Arms	P9 w/ Night Sights, External Safety & LCI	KP9193	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-p9-w-external-safety-and-lci.asp
Kahr Arms	PM40, Matte Blackened Stainless Slide w/ Night Sights	PM4044N	NO	https://shopkahrfirearmsgroup.com/pm40-black-w-night-sights-pm4044n/
Kahr Arms	PM45, Blackened Stainless Slide w/ Night Sights	PM4544N	NO	https://shopkahrfirearmsgroup.com/pm45-black-w-night-sights-pm4544n/
Kahr Arms	PM9 Covert w/ Night Sights	KP C9094N	NO	https://shopkahrfirearmsgroup.com/pm9-covert-w-night-sights/
Kahr Arms	PM9, Blackened Stainless Slide w/ Night Sights, CA Approved	PM9094NA	YES	https://shopkahrfirearmsgroup.com/pistols/kahr-pm9-black-w-night-sights.asp
Kahr Arms	PM9, Matte Stainless Slide w/ Night Sights, CA Approved	PM9093NA	YES	https://shopkahrfirearmsgroup.com/pistols/kahr-pm9-w-night-sights.asp
Kahr Arms	PM9, Thin Blue Line special Edition w/ Night Sights	PM9093TBL	NO	https://shopkahrfirearmsgroup.com/pm9-thin-blue-line-special-edition-w-night-sights/
Kahr Arms	S9, Matte Stainless Slide	S9093	NO	https://shopkahrfirearmsgroup.com/s9/
Kahr Arms	ST9, Matte Stainless Slide	ST9093	NO	https://shopkahrfirearmsgroup.com/st9/
Kahr Arms	T40, Matte Stainless Steel Slide w/ Night Sights	KT4043N	NO	https://shopkahrfirearmsgroup.com/st9-lig-limited-edition/
Kahr Arms	T40, Matte Stainless Steel Slide w/ White Bar-dot Sights	KT4043N	NO	https://shopkahrfirearmsgroup.com/copy-of-t40-matte-stainless-steel-slide-w-night-sights/
Kahr Arms	T9, Elite, Polished Stainless Steel Slide w/ Night Sights	KT9098N	NO	https://shopkahrfirearmsgroup.com/copy-of-t9-elite-polished-stainless-steel-slide-w-night-sights/
Kahr Arms	T9, Matte Stainless Steel Slide	KT9093	NO	https://shopkahrfirearmsgroup.com/copy-of-t9-matte-stainless-steel-slide/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Kahr Arms	T9, Matte Stainless Steel Slide w/ Night Sights	KT9093N	NO	https://shopkahrfirearmsgroup.com/copy-of-t9-matte-stainless-steel-slide-w-night-sights-1/
Kahr Arms	TP45	TP4543	NO	https://shopkahrfirearmsgroup.com/tp45-tp4543/
Kahr Arms	TP45 w/ Night Sights	TP4543N	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-tp45-w-night-sights.asp
Kahr Arms	TP45 w/ Novak Night Sights	TP4543-NOVAK	NO	https://shopkahrfirearmsgroup.com/tp45-w-novak-night-sights-tp4543-novak/
Kahr Arms	TP9 w/ Night Sights	TP9093N	NO	https://shopkahrfirearmsgroup.com/pistols/kahr-tp9-w-night-sights.asp
KeITec	P17	not available	NO	https://www.keitecweapons.com/firearms/pistols/p17/
KeITec	CP33	not available	NO	https://www.keitecweapons.com/firearms/pistols/cp33/
KeITec	PF9	not available	NO	https://www.keitecweapons.com/firearms/pistols/pf9/
KeITec	P32	not available	NO	https://www.keitecweapons.com/firearms/pistols/p32/
KeITec	P3AT	not available	NO	https://www.keitecweapons.com/firearms/pistols/p3at/
KeITec	PMR30	not available	NO	https://www.keitecweapons.com/firearms/pistols/bmr30/
Kimber	Micro Two Tone (LG)(NS)	3300215	NO	https://www.kimberamerica.com/micro-cimison-carry-a-1
Kimber	Micro Two-Tone (NS)	3300206	NO	https://www.kimberamerica.com/micro-two-tone-380
Kimber	Micro Desert Night (NS)	3300208	NO	https://www.kimberamerica.com/micro-desert-night
Kimber	Micro Desert Tan (LG) (NS)	3300209	NO	https://www.kimberamerica.com/micro-desert-tan-lg-1
Kimber	Micro Raptor (NS)	3300087	NO	https://www.kimberamerica.com/micro-raptor
Kimber	Micro Raptor Stainless (NS)	3300084	NO	https://www.kimberamerica.com/micro-raptor-stainless
Kimber	Micro Rose Gold (NS)	3300173	NO	https://www.kimberamerica.com/micro-rose-gold-1
Kimber	Micro Amethyst (NS)	3300160	NO	https://www.kimberamerica.com/micro-amethyst
Kimber	Micro Sapphire (NS)	3300090	NO	https://www.kimberamerica.com/pistols/micro?layer&cat=335
Kimber	Micro Bel Air (NS)	3300210	NO	https://www.kimberamerica.com/micro-sapphire
Kimber	Micro Eclipse (NS)	3300188	NO	https://www.kimberamerica.com/micro-eclipse-1

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Kimber	Micro Stainless Rosewood (NS)	3300207	NO	https://www.kimberamerica.com/micro-stainless-rosewood
Kimber	Micro 9 Triati	3300212	NO	https://www.kimberamerica.com/micro-9-triati-1
Kimber	Micro 9 Desert Night (DN)	3300197	NO	https://www.kimberamerica.com/micro-9-desert-night-dn-1
Kimber	Micro 9 ESV (Black)	3300199	NO	https://www.kimberamerica.com/micro-9-esv-black-1
Kimber	Micro 9 ESV (Gray)	3300204	NO	https://www.kimberamerica.com/micro-9-esv-gray
Kimber	Micro 9 Woodland Night (LG)	3300178	NO	https://www.kimberamerica.com/micro-9-woodland-night-lg-1
Kimber	Micro 9 KHx	3300198	NO	https://www.kimberamerica.com/micro-9-khx
Kimber	Micro 9 Desert Tan (LG)	3300168	NO	https://www.kimberamerica.com/micro-9-desert-tan-lg
Kimber	Micro 9 Two Tone (LG)	3300216	NO	https://www.kimberamerica.com/micro-9-crimson-carry-a-1
Kimber	Micro 9 Two-Tone	3300099	NO	https://www.kimberamerica.com/micro-9-4t
Kimber	Micro 9 Stainless (DN)	3300193	NO	https://www.kimberamerica.com/micro-9-dn-1
Kimber	Micro 9 Stainless	3300158	NO	https://www.kimberamerica.com/micro-9
Kimber	Micro 9 Eclipse	3300189	NO	https://www.kimberamerica.com/micro-9-eclipse-1
Kimber	Micro 9 Stainless Raptor	3300109	NO	https://www.kimberamerica.com/micro-9-stainless-raptor
Kimber	Micro 9 Nightfall (DN)	3300194	NO	https://www.kimberamerica.com/micro-9-nightfall-dn-1
Kimber	MICRO 9 RAPIDE (Black Ice)	3300223	NO	https://www.kimberamerica.com/micro-9-rapide-black-ice-1
Kimber	Micro 9 Rose Gold	3300174	NO	https://www.kimberamerica.com/micro-9-rose-gold-1
Kimber	Micro 9 Bel Air	3300110	NO	https://www.kimberamerica.com/micro-9-bel-air
Kimber	Micro 9 Amethyst	3300214	NO	https://www.kimberamerica.com/micro-9-amethyst-1
Kimber	Micro 9 Sapphire	3300111	NO	https://www.kimberamerica.com/micro-9-sapphire
Kimber	Ultra Carry II (Two-Tone)	3200332	NO	https://www.kimberamerica.com/ultra-carry-two-tone
Kimber	Pro Carry II (Two-Tone)	3200333	NO	https://www.kimberamerica.com/pro-carry-4t

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Kimber	Rose Gold Ultra II	3200372	NO	https://www.kimberamerica.com/rose-gold-ultra-ii
Kimber	Aegis Elite Custom (OI)	3000352	NO	https://www.kimberamerica.com/aegis-elite-custom-oi-1
Kimber	Aegis Elite Custom	3000351	NO	https://www.kimberamerica.com/aegis-elite-custom-1
Kimber	Aegis Elite Pro (OI)	3000355	NO	https://www.kimberamerica.com/aegis-elite-pro-oi-2
Kimber	Aegis Elite Pro	3000349	NO	https://www.kimberamerica.com/aegis-elite-pro-2
Kimber	Aegis Elite Ultra	3000356	NO	https://www.kimberamerica.com/aegis-elite-ultra-2
Kimber	KHX Custom	3000358	NO	https://www.kimberamerica.com/khx-custom-2
Kimber	KHX Custom (OR)	3000360	NO	https://www.kimberamerica.com/khx-custom-or-2
Kimber	KHX Pro	3000361	NO	https://www.kimberamerica.com/khx-pro-2
Kimber	KHX Pro (OR)	3000364	NO	https://www.kimberamerica.com/khx-pro-or-2
Kimber	KHX Ultra	3000371	NO	https://www.kimberamerica.com/khx-ultra-2
Kimber	KHX Custom (OI)	3000378	NO	https://www.kimberamerica.com/khx-custom-oi-rm3-5
Kimber	KHX Custom/RL (OI)	3000380	NO	https://www.kimberamerica.com/khx-custom-rl-oi-rm3-5
Kimber	RAPIDE (Black Ice)	3000385	NO	https://www.kimberamerica.com/rapide-black-ice-dn-n3
Kimber	Custom II (Two-Tone) (LG)	3200387	NO	https://www.kimberamerica.com/custom-ii-two-tone-a-1
Kimber	Pro Carry II (Two-Tone) (LG)	3200388	NO	https://www.kimberamerica.com/two-tone-pro-carry-ii-a-1
Kimber	Stainless II	3200327	NO	https://www.kimberamerica.com/stainless-ii
Kimber	Stainless Target II	3200326	NO	https://www.kimberamerica.com/stainless-target-ii
Kimber	Desert Warrior (TFS)	3000237	NO	https://www.kimberamerica.com/desert-warrior-tfs-45acp
Kimber	Stainless Pro Carry II	3200323	NO	https://www.kimberamerica.com/stainless-pro-carry-ii
Kimber	Stainless Ultra Carry II	3200329	NO	https://www.kimberamerica.com/stainless-ultra-carry-ii
Kimber	Custom II (Two-Tone)	3200334	NO	https://www.kimberamerica.com/custom-ii-two-tone-a

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Kimber	Custom TLE/RL II (TFS)	3200339	NO	https://www.kimberamerica.com/custom-tle-rl-ii-tfs
Kimber	Ultra CDP	3000256	NO	https://www.kimberamerica.com/ultra-cdp-ii
Kimber	Pro CDP	3000258	NO	https://www.kimberamerica.com/pro-cdp-ii
Kimber	Stainless Raptor II	3200366	NO	https://www.kimberamerica.com/stainless-raptor-ii-45acp
Kimber	Stainless Ultra Raptor II	3200365	NO	https://www.kimberamerica.com/stainless-pro-raptor-ii-45acp
Kimber	Sapphire Ultra II	3200273	NO	https://www.kimberamerica.com/sapphire-ultra-ii
Kimber	Amethyst Ultra II	3200363	NO	https://www.kimberamerica.com/amethyst-ultra-ii
Kimber	EVO SP (Two- Tone)	3900010	NO	https://www.kimberamerica.com/evo-sp-two-tone-1
Kimber	EVO SP Stainless Raptor	3900014	NO	https://www.kimberamerica.com/evo-sp-raptor-1
Kimber	EVO SP (CDP)	3900011	NO	https://www.kimberamerica.com/evo-sp-cdp-1
Kimber	EVO SP SELECT (BLACK)	3900017	NO	https://www.kimberamerica.com/evo-sp-select-black-1
Kimber	EVO SP SELECT (STAINLESS)	3900018	NO	https://www.kimberamerica.com/evo-sp-select-stainless-1
Kimber	EVO SP (CS)	3900013	NO	https://www.kimberamerica.com/evo-sp-cs-1
Kimber	K6s DASA (Texas Edition)	3400028	NO	https://www.kimberamerica.com/k6s-texas-edition-1
Kimber	K6s DASA 4" Target	3700621	NO	https://www.kimberamerica.com/k6s-dasa-4-target-1
Kimber	K6s DASA 4" Combat	3400031	NO	https://www.kimberamerica.com/k6s-dasa-4-combat-1
Kimber	K6s DASA 4" TARGET GFO	3400032	NO	https://www.kimberamerica.com/k6s-dasa-4-in-target-gfo-1
Kimber	K6s (DASA) (2")	3400021	NO	https://www.kimberamerica.com/k6s-da-sa-2-1
Kimber	K6s (DASA) (3")	3400016	NO	https://www.kimberamerica.com/k6s-da-sa-3-1
Kimber	K6s DCR	3400009	NO	https://www.kimberamerica.com/k6s-dcr
Kimber	K6s Stainless 3"	3400011	NO	https://www.kimberamerica.com/k6s-stainless-3
Kimber	K6s Stainless	3400010	NO	https://www.kimberamerica.com/k6s

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Kimber	Custom II	3200001CA	YES	https://www.kimberamerica.com/custom-ii-ca
Kimber	Custom Target II	3200004CA	YES	https://www.kimberamerica.com/custom-target-ii-ca
Kimber	Stainless Target II	3200108CA	YES	https://www.kimberamerica.com/stainless-target-ii-ca
Kimber	Stainless II	3200007CA	YES	https://www.kimberamerica.com/stainless-ii-ca
Kimber	Ultra Covert II	3200167CA	YES	https://www.kimberamerica.com/ultra-covert-ii-ca
Kimber	Stainless Pro Carry II	3200052CA	YES	https://www.kimberamerica.com/stainless-pro-carry-ii-ca
Kimber	Pro Carry II	3200051CA	YES	https://www.kimberamerica.com/pro-carry-ii-ca
Kimber	Pro Carry HD II	3200044CA	YES	https://www.kimberamerica.com/pro-carry-hd-ca
Kimber	Stainless TLE II	3200139CA	YES	https://www.kimberamerica.com/stainless-tle-ii-ca
Kimber	Custom TLE/RL II	3200148CA	YES	https://www.kimberamerica.com/custom-tle-rl-ii-ca
Kimber	Stainless TLE/RL II	3200140CA	YES	https://www.kimberamerica.com/stainless-tle-rl-ii-ca
Kimber	Custom TLE II	3200068CA	YES	https://www.kimberamerica.com/custom-tle-ii-ca
Kimber	Stainless Ultra Carry II	3200062CA	YES	https://www.kimberamerica.com/stainless-ultra-carry-ii-ca
Kimber	Ultra Carry II	3200061CA	YES	https://www.kimberamerica.com/ultra-carry-ca
Kimber	Pro CDP II	3200055CA	YES	https://www.kimberamerica.com/pro-cdp-ca
Kimber	Ultra CDP II	3200057CA	YES	https://www.kimberamerica.com/ultra-cdp-ii-ca
Kimber	Custom CDP II	3200018CA	YES	https://www.kimberamerica.com/custom-cdp-ca
Kimber	Raptor II	3200117CA	YES	https://www.kimberamerica.com/raptor-ca
Kimber	Ultra Raptor II	3200150CA	YES	https://www.kimberamerica.com/ultra-raptor-ca
Kimber	Stainless Raptor II	3200181CA	YES	https://www.kimberamerica.com/stainless-raptor-ca
Kimber	Eclipse Target II	3200030CA	YES	https://www.kimberamerica.com/eclipse-target-ii-ca
Kimber	Eclipse Ultra II	3200042CA	YES	https://www.kimberamerica.com/eclipse-ultra-ca

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Kimber	Eclipse Custom II	3200122CA	YES	https://www.kimberamerica.com/eclipse-custom-ii-ca
Kimber	Eclipse Pro II	3200035CA	YES	https://www.kimberamerica.com/eclipse-pro-ii-ca
Kimber	Super Match II	3200014CA	YES	https://www.kimberamerica.com/super-match-ca
Kimber	Tactical Custom II	3200137CA	YES	https://www.kimberamerica.com/tactical-custom-ii-ca
Kimber	K6s DC	3400012CA	YES	https://www.kimberamerica.com/k6s-dc-2
Kimber	K6s (DASA) (3")	3400016CA	YES	https://www.kimberamerica.com/k6s-da-sa-3-1-1
Kimber	K6s (DASA) (2")	3400021CA	YES	https://www.kimberamerica.com/k6s-da-sa-2-1-1
Kimber	K6s Stainless	3400010CA	YES	https://www.kimberamerica.com/k6-stainless-2
Kimber	K6s Stainless (LG)	3400003CA	YES	https://www.kimberamerica.com/k6s-stainless-1a-2
Kimber	K6s Stainless (NS)	3400004CA	YES	https://www.kimberamerica.com/k6s-stainless-ns-1
Kimber	K6s DCR	3400009CA	YES	https://www.kimberamerica.com/k6s-dcr-1
Kimber	Warrior II	3200125	YES	https://www.kimberamerica.com/warrior-ca
Kimber	Stainless Target II	3200326	NO	https://www.kimberamerica.com/stainless-target-ii
Kimber	Stainless Target (LS)	3000373	NO	https://www.kimberamerica.com/stainless-target-ls-2
Kimber	Super Match II	3200309	NO	https://www.kimberamerica.com/super-match-ii
Kriss USA	SPHINX SDP Compact TB	S4-WDCME-079	NO	https://kriss-usa.com/item/sphinx-sdp-compact/
Kriss USA	SPHINX SDP Duty	S4-WDCME086	NO	https://kriss-usa.com/item/sphinx-sdp-duty/
L. W. Seecamp Co.	LWS .25	not available	NO	http://www.seecamp.com/products.htm
L. W. Seecamp Co.	LWS .32	not available	YES	http://www.seecamp.com/products.htm
L. W. Seecamp Co.	LWS .380	not available	NO	http://www.seecamp.com/products.htm
L. W. Seecamp Co.	LWS 32 CA Edition (Blk) / Stainless Steel	not available	YES	https://oag.ca.gov/firearms/handgun/lws-32-ca-edition-blk
L. W. Seecamp Co.	LWS 32 CA Edition (Milford, CT) / Stainless Steel	not available	YES	https://oag.ca.gov/firearms/handgun/lws-32-ca-edition-milford-ct

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
L.W. Seecamp Co.	LWS 32 CA Edition (Southwick, MA) (Stinis) / Stainless Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/lws-32-ca-edition-southwick-ma-stinis
Masterpiece Arms	MPA57DMS 5.7x28mm Pistol	MPA57sst	NO	https://masterpiecearms.com/shop/mpa57sst-5-7x28mm-pistol/
Magnum Research Inc.	Desert Eagle Pistol, Aluminum Frame, SS Slide/Barrel	not available	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-16-asp
Magnum Research Inc.	Desert Eagle Pistol, Black 50 ae	DE50	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-black-asp
Magnum Research Inc.	Desert Eagle Pistol, Black 44 magnum	DE44	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-black-asp
Magnum Research Inc.	Desert Eagle Pistol, Black 357 magnum	not available	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-black-asp
Magnum Research Inc.	Desert Eagle Pistol, Black w/ Tiger Stripes 50 ae	DE40BTS	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-black-w-tiger-stripes-asp
Magnum Research Inc.	Desert Eagle Pistol, Black w/ Tiger Stripes 44 magnum	DE50BTS	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-black-w-tiger-stripes-asp
Magnum Research Inc.	Desert Eagle Pistol, Black with Integral Muzzle Brake	not available	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-black-with-integral-muzzle-brake-asp
Magnum Research Inc.	Desert Eagle Pistol, Black with Integral Muzzle Brake	not available	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-black-with-integral-muzzle-brake-asp
Magnum Research Inc.	Desert Eagle Pistol, Black with Integral Muzzle Brake	not available	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-black-with-integral-muzzle-brake-asp
Magnum Research Inc.	Desert Eagle Pistol, Brushed Chrome 50 ae	not available	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-brushed-chrome-asp
Magnum Research Inc.	Desert Eagle Pistol, Brushed Chrome 44 magnum	not available	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-brushed-chrome-asp
Magnum Research Inc.	Desert Eagle Pistol, Brushed Chrome 357 magnum	not available	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-brushed-chrome-asp
Magnum Research Inc.	Desert Eagle Pistol, Burnt Bronze 50 ae	DE50BB	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-burnt-bronze-asp
Magnum Research Inc.	Desert Eagle Pistol, Burnt Bronze 44 magnum	DE44BB	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-burnt-bronze-asp
Magnum Research Inc.	Desert Eagle Pistol, Case Hardened 50 ae	not available	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-case-hardened-asp
Magnum Research Inc.	Desert Eagle Pistol, Case Hardened 44 magnum	not available	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-case-hardened-asp
Magnum Research Inc.	Desert Eagle Pistol, Case Hardened 357 magnum	not available	NO	https://shopkahfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-case-hardened-asp
Magnum Research Inc.	Desert Eagle Pistol, L5, 5" Barrel with Integral Muzzle Brake, NY OKAY 50 ae	not available	NO	https://shopkahfirearmsgroup.com/copy-of-desert-eagle-357-magnum-black45/
Magnum Research Inc.	Desert Eagle Pistol, L5, 5" Barrel with Integral Muzzle Brake, NY OKAY 44 magnum	not available	NO	https://shopkahfirearmsgroup.com/copy-of-desert-eagle-357-magnum-black45/
Magnum Research Inc.	Desert Eagle Pistol, L5, 5" Barrel with Integral Muzzle Brake, NY OKAY 357 magnum	not available	NO	https://shopkahfirearmsgroup.com/copy-of-desert-eagle-357-magnum-black45/

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Magnum Research Inc.	Desert Eagle Pistol, Polished Chrome 50 ae	not available	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-polished-chrome.asp
Magnum Research Inc.	Desert Eagle Pistol, Polished Chrome 44 magnum	not available	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-polished-chrome.asp
Magnum Research Inc.	Desert Eagle Pistol, Polished Chrome 357 magnum	not available	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-polished-chrome.asp
Magnum Research Inc.	Desert Eagle Pistol, Stainless w/ Integral Muzzle Brake 50 ae	not available	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-stainless-w-integral-muzzle-brake.asp
Magnum Research Inc.	Desert Eagle Pistol, Stainless w/ Integral Muzzle Brake 44 magnum	not available	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-stainless-w-integral-muzzle-brake.asp
Magnum Research Inc.	Desert Eagle Pistol, Stainless w/ Integral Muzzle Brake 357 magnum	not available	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-stainless-w-integral-muzzle-brake.asp
Magnum Research Inc.	Desert Eagle Pistol, Titanium Gold 50 ae	not available	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-titanium-gold.asp
Magnum Research Inc.	Desert Eagle Pistol, Titanium Gold 44 magnum	not available	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-titanium-gold.asp
Magnum Research Inc.	Desert Eagle Pistol, Titanium Gold 357 magnum	not available	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-titanium-gold.asp
Magnum Research Inc.	Desert Eagle Pistol, Titanium Gold w/ Tiger Stripes 50 ae	DE50TG-TS	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-titanium-gold-w-tiger-stripes.asp
Magnum Research Inc.	Desert Eagle Pistol, Titanium Gold w/ Tiger Stripes 44 magnum	DE44TG-TS	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-titanium-gold-w-tiger-stripes.asp
Magnum Research Inc.	Desert Eagle Pistol, Titanium Gold w/ Tiger Stripes 357 magnum	DE357TG-TS	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-titanium-gold-w-tiger-stripes.asp
Magnum Research Inc.	Desert Eagle Pistol, Tungsten 50 ae	DE50TU	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-tungsten.asp
Magnum Research Inc.	Desert Eagle Pistol, Tungsten 44 magnum	DE44TU	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-tungsten.asp
Magnum Research Inc.	Desert Eagle Pistol, White Matte Distressed 50 ae	DE50WMD	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-white-matte-distressed.asp
Magnum Research Inc.	Desert Eagle Pistol, White Matte Distressed 44 magnum	DE44WMD	YES	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-50-ae-white-matte-distressed.asp
Magnum Research Inc.	Desert Eagle, .44 Magnum, CA OKAY Models Black	DE44CA	YES	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-44-magnum-black-ca-okay.asp
Magnum Research Inc.	Desert Eagle, .44 Magnum, CA OKAY Models Tungsten	DE44CATU	YES	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-44-magnum-black-ca-okay.asp
Magnum Research Inc.	Desert Eagle, .44 Magnum, CA OKAY Models Polished Chrome	DE44CAPC	YES	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-44-magnum-black-ca-okay.asp
Magnum Research Inc.	Desert Eagle, .44 Magnum, CA OKAY Models Burnt Bronze	DE44CABB	YES	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-44-magnum-black-ca-okay.asp
Magnum Research Inc.	Desert Eagle, .44 Magnum, CA OKAY Models Brushed Chrome	DE44CABC	YES	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-44-magnum-black-ca-okay.asp
Magnum Research Inc.	Desert Eagle Pistol, .429DE Stainless w/ Integral Muzzle Brake	DE429SRMB	NO	https://shopkahrfirearmsgroup.com/new-desert-eagle-pistol-429de-stainless-w-integral-muzzle-brake/

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Magnum Research Inc.	Desert Eagle 1911 C Model	DE1911C	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-1911-c-model.asp
Magnum Research Inc.	Desert Eagle 1911 C, 9mm	DE1911C9	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-1911-c-9mm.asp
Magnum Research Inc.	Desert Eagle 1911 C, Stainless	DE1911CSS	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-1911-c-stainless.asp
Magnum Research Inc.	Desert Eagle 1911 G Model	DE1911G	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-1911-g-model.asp
Magnum Research Inc.	Desert Eagle 1911 G, 9mm	DE1911G9	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-1911-g-9mm.asp
Magnum Research Inc.	Desert Eagle 1911 G, Stainless	DE1911GSS	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-1911-g-stainless.asp
Magnum Research Inc.	Desert Eagle 1911 U Model	DE1911U	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-1911-u-model.asp
Magnum Research Inc.	Desert Eagle 1911 U, 9mm	DE1911U9	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-1911-u-9mm.asp
Magnum Research Inc.	Desert Eagle 1911 U, Stainless	DE1911USS	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-desert-eagle-1911-u-stainless.asp
Magnum Research Inc.	BFR, .3030 Winchester Revolver, Stainless Steel 7.5 Bisley	BFR30-307B	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-3030-win-revolver-75-inch-barrel.asp
Magnum Research Inc.	BFR, .3030 Winchester Revolver, Stainless Steel 7.5 standard	BFR30-307	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-3030-win-revolver-75-inch-barrel.asp
Magnum Research Inc.	BFR, .3030 Winchester Revolver, Stainless Steel 10 Bisley	BFR30-30B	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-3030-win-revolver-75-inch-barrel.asp
Magnum Research Inc.	BFR, .3030 Winchester Revolver, Stainless Steel 10 standard	BFR30-30	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-3030-win-revolver-75-inch-barrel.asp
Magnum Research Inc.	BFR, .44 Magnum Revolver, Stainless Steel 5 bisley	BFRMAG445B	NO	https://shopkahrfirearmsgroup.com/dealer/firearms/magnum-research-44-magnum-revolver-5-inch-barrel.asp
Magnum Research Inc.	BFR, .44 Magnum Revolver, Stainless Steel 5 standard	BFR44MAG5	NO	https://shopkahrfirearmsgroup.com/dealer/firearms/magnum-research-44-magnum-revolver-5-inch-barrel.asp
Magnum Research Inc.	BFR, .44 Magnum Revolver, Stainless Steel 7.5 bisley	BFR44MAG7B	NO	https://shopkahrfirearmsgroup.com/dealer/firearms/magnum-research-44-magnum-revolver-5-inch-barrel.asp
Magnum Research Inc.	BFR, .44 Magnum Revolver, Stainless Steel 7.5 standard	BFR44MAG7	NO	https://shopkahrfirearmsgroup.com/dealer/firearms/magnum-research-44-magnum-revolver-5-inch-barrel.asp
Magnum Research Inc.	BFR, .444 Marlin Revolver, 10" Barrel, Stainless Steel bisley	BFR444MB	NO	https://shopkahrfirearmsgroup.com/dealer/firearms/magnum-research-444-marlin-revolver-10-inch-barrel.asp
Magnum Research Inc.	BFR, .444 Marlin Revolver, 10" Barrel, Stainless Steel standard	BFR444M	NO	https://shopkahrfirearmsgroup.com/dealer/firearms/magnum-research-444-marlin-revolver-10-inch-barrel.asp
Magnum Research Inc.	BFR, .45 Long Colt/410, 7.5" Barrel, Stainless Steel wVent Rib bisley	BFR45LC410B	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-45-long-colt410-revolver-75-inch-barrel.asp
Magnum Research Inc.	BFR, .45 Long Colt/410, 7.5" Barrel, Stainless Steel wVent Rib standard	BFR45LC410	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-45-long-colt410-revolver-75-inch-barrel.asp
Magnum Research Inc.	BFR, .45/70, Stainless Steel 7.5 bisley	BFR45-707B	NO	https://shopkahrfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel/

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Magnum Research Inc.	BFR, .45/70, Stainless Steel 7.5 standard	BFR45-707	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel/
Magnum Research Inc.	BFR, .45/70, Stainless Steel 10 bisley	BFR45-70B	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel/
Magnum Research Inc.	BFR, .45/70, Stainless Steel 10 standard	BFR45-70	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel/
Magnum Research Inc.	BFR, .450 Marlin Revolver, 10" Barrel, Stainless Steel bisley	BFR450MB	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel-1/
Magnum Research Inc.	BFR, .450 Marlin Revolver, 10" Barrel, Stainless Steel standard	BFR450M	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel-1/
Magnum Research Inc.	BFR, .454 Casull, Stainless Steel 6.5 bisley	BFR454C6B	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-44-magnum-revolver-stainless-steel/
Magnum Research Inc.	BFR, .454 Casull, Stainless Steel 6.5 standard	BFR454C6	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-44-magnum-revolver-stainless-steel/
Magnum Research Inc.	BFR, .454 Casull, Stainless Steel 7.5 bisley	BFR454C7B	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-44-magnum-revolver-stainless-steel/
Magnum Research Inc.	BFR, .454 Casull, Stainless Steel 7.5 standard	BFR454C7	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-44-magnum-revolver-stainless-steel/
Magnum Research Inc.	BFR, .460 S&W, Stainless Steel 7.5 bisley	BFR460SW7B	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel-2/
Magnum Research Inc.	BFR, .460 S&W, Stainless Steel 7.5 standard	BFR460SW7	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel-2/
Magnum Research Inc.	BFR, .460 S&W, Stainless Steel 10 bisley	BFR460SW10B	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel-2/
Magnum Research Inc.	BFR, .460 S&W, Stainless Steel 10 standard	BFR460SW10	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel-2/
Magnum Research Inc.	BFR, .480 Ruger/.475 Linebaugh Revolver, Stainless Steel 6.5 bisley	BFR480-475B	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-44-magnum-revolver-stainless-steel-1/
Magnum Research Inc.	BFR, .480 Ruger/.475 Linebaugh Revolver, Stainless Steel 6.5 standard	BFR480-475	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-44-magnum-revolver-stainless-steel-1/
Magnum Research Inc.	BFR, .480 Ruger/.475 Linebaugh Revolver, Stainless Steel 7.5 bisley	BFR480-475B	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-44-magnum-revolver-stainless-steel-1/
Magnum Research Inc.	BFR, .480 Ruger/.475 Linebaugh Revolver, Stainless Steel 7.5 standard	BFR480-4757	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-44-magnum-revolver-stainless-steel-1/
Magnum Research Inc.	BFR, .500 JRH Revolver, Stainless Steel 5.5 bisley	BFR500JRH5B	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-50ae-revolver-stainless-steel/
Magnum Research Inc.	BFR, .500 JRH Revolver, Stainless Steel 5.5 standard	BFR500JRH5	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-50ae-revolver-stainless-steel/
Magnum Research Inc.	BFR, .500 JRH Revolver, Stainless Steel 7.5 bisley	BFR500JRH7B	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-50ae-revolver-stainless-steel/
Magnum Research Inc.	BFR, .500 JRH Revolver, Stainless Steel 7.5 standard	BFR500JRH7	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-50ae-revolver-stainless-steel/
Magnum Research Inc.	BFR, .500 S&W, Stainless Steel 7.5 bisley	not available	NO	https://shopkahfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel-3/

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Magnum Research Inc.	BFR, .500 S&W, Stainless Steel 7.5 standard	not available	NO	https://shopkahrfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel-3/
Magnum Research Inc.	BFR, .500 S&W, Stainless Steel 10 bisley	not available	NO	https://shopkahrfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel-3/
Magnum Research Inc.	BFR, .500 S&W, Stainless Steel 10 standard	not available	NO	https://shopkahrfirearmsgroup.com/copy-of-bfr-30-30-winchester-revolver-stainless-steel-3/
Magnum Research Inc.	BFR, .50AE Revolver, Stainless Steel 6.5 bisley	BFR50AE6B	NO	https://shopkahrfirearmsgroup.com/copy-of-bfr-44-magnum-revolver-stainless-steel-2/
Magnum Research Inc.	BFR, .50AE Revolver, Stainless Steel 6.5 standard	BFR50AE6	NO	https://shopkahrfirearmsgroup.com/copy-of-bfr-44-magnum-revolver-stainless-steel-2/
Magnum Research Inc.	BFR, .50AE Revolver, Stainless Steel 7.5 bisley	BFR50AE7B	NO	https://shopkahrfirearmsgroup.com/copy-of-bfr-44-magnum-revolver-stainless-steel-2/
Magnum Research Inc.	BFR, .50AE Revolver, Stainless Steel 7.5 standard	BFR50AE7	NO	https://shopkahrfirearmsgroup.com/copy-of-bfr-44-magnum-revolver-stainless-steel-2/
Magnum Research Inc.	Baby Eagle III, Full Size Polymer 9mm	BE99003RL	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-baby-desert-eagle-iii-9mm-polymer-full-size-10-round.asp
Magnum Research Inc.	Baby Eagle III, Full Size Polymer 40 S&W	BE94003RL	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-baby-desert-eagle-iii-9mm-polymer-full-size-10-round.asp
Magnum Research Inc.	Baby Eagle III, Full Size Carbon Steel 9mm	BE99003R	NO	https://shopkahrfirearmsgroup.com/dealer/firearms/magnum-research-baby-desert-eagle-iii-9mm-steel-full-size-10-round.asp
Magnum Research Inc.	Baby Eagle III, Full Size Carbon Steel 40 S&W	BE94003R	NO	https://shopkahrfirearmsgroup.com/dealer/firearms/magnum-research-baby-desert-eagle-iii-9mm-steel-full-size-10-round.asp
Magnum Research Inc.	Baby Eagle III, Full Size Carbon Steel 45 ACP	BE45003R	NO	https://shopkahrfirearmsgroup.com/dealer/firearms/magnum-research-baby-desert-eagle-iii-9mm-steel-full-size-10-round.asp
Magnum Research Inc.	Baby Eagle III, Semi-Compact Size Carbon Steel 9mm	BE99003RS	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-baby-desert-eagle-iii-9mm-polymer-compact-10-round.asp
Magnum Research Inc.	Baby Eagle III, Semi-Compact Size Carbon Steel 40 S&W	BE94003RS	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-baby-desert-eagle-iii-9mm-steel-compact-10-round.asp
Magnum Research Inc.	Baby Eagle III, Semi-Compact Size Carbon Steel 45 ACP	BE45003RS	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-baby-desert-eagle-iii-9mm-polymer-compact-10-round.asp
Magnum Research Inc.	Baby Eagle III, Semi-Compact Size Polymer 9mm	BE99003RSL	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-baby-desert-eagle-iii-9mm-polymer-compact-10-round.asp
Magnum Research Inc.	Baby Eagle III, Semi-Compact Size Polymer 40 S&W	BE94133RSL	NO	https://shopkahrfirearmsgroup.com/firearms/magnum-research-baby-desert-eagle-iii-9mm-polymer-compact-10-round.asp
Nemo Arms	MONARK MK-9MM-5SFTB-B	MK-9MM-5SFTB-B	NO	https://nemoarms.com/product/monark-mk-9mm-5sftb-b/
Nemo Arms	MONARK MK-9MM-5STB-B	MK-9MM-5STB-B	NO	https://nemoarms.com/product/monark-mk-9mm-5sftb-b/
Nemo Arms	MONARK MK-9MM-5STB-FDE	MK-9MM-5STB	NO	https://nemoarms.com/product/monark-mk-9mm-5sftb-fde/
Nemo Arms	MONARK MK-9MM-5	MK-9MM-5	NO	https://nemoarms.com/product/monark-mk-9mm-5/
Mossberg	MC1sc	89001	NO	https://www.mossberg.com/category/series/mc1sc/

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Mossberg	MC1sc Stainless, Two-Tone	89006	NO	https://www.mossberg.com/category/series/mc1sc/
Mossberg	MC1sc Cross-Bolt Safety	89002	NO	https://www.mossberg.com/category/series/mc1sc/
Mossberg	MC1sc Stainless, Two-Tone w/ Cross Bolt Safety	89008	NO	https://www.mossberg.com/category/series/mc1sc/
Mossberg	MC1sc TRUGLO® Tritium PRO™ Sights	89003	NO	https://www.mossberg.com/category/series/mc1sc/
Mossberg	MC1sc VIRIDIAN® Laser Equipped	89004	NO	https://www.mossberg.com/category/series/mc1sc/
Mossberg	MC1sc – MA Compliant (Loaded Chamber View Port)	89007	NO	https://www.mossberg.com/category/series/mc1sc/
Mossberg	MC2c	89012	NO	https://www.mossberg.com/category/series/mc2c/
Mossberg	MC2c Stainless Two-Tone	89020	NO	https://www.mossberg.com/category/series/mc2c/
Mossberg	MC2c Cross-Bolt Safety	89014	NO	https://www.mossberg.com/category/series/mc2c/
Mossberg	MC2c Stainless Two-Tone w/ Cross-Bolt Safety	89018	NO	https://www.mossberg.com/category/series/mc2c/
Mossberg	MC2c TRUGLO® Tritium PRO™ Sights	89016	NO	https://www.mossberg.com/category/series/mc2c/
Polymer 80	P80 PFC9 Pistol with Threaded Barrel & Night	P80-PFC9-CMP TFNS-BLK-10	NO	https://www.polymer80.com/P80
Nighthawk Custom	Silent Hawk 9mm	Not available	NO	https://www.nighthawkcustom.com/pistols/silent-hawk
Remington	1911 R1 Enhanced Threaded Barrel	96339	NO	https://www.gagegunshop.com/mu96339-rem-1911-r1-45acp-5-threaded-7rd.html
Rock Island Amory	GI Standard FS Threaded - 45 ACP	51473	NO	https://www.amscor.com/firearms/ia/gi-series/gi-standard-fs-threaded-45-acp/
Rock Island Amory	TAC ULTRA THREADED 10MM 16rd	56862	NO	https://www.amscor.com/firearms/ia/tac-series/tac-ultra-threaded-10mm-16rd/
Ruger	LCP Standard Model	3701	NO	https://www.ruger.com/products/lcp/specSheets/3701.html
Ruger	LCP Viridian® E-Series™ Red Laser	3752	NO	https://www.ruger.com/products/lcp/specSheets/3752.html
Ruger	LCP Matte Stainless Slide	3791	NO	https://www.ruger.com/products/lcp/specSheets/3791.html
Ruger	LCP American Flag Cerakote® Slide	13710	NO	https://www.ruger.com/products/lcp/specSheets/13710.html
Ruger	LCP Pink Grip Frame	3717	NO	https://www.ruger.com/products/lcp/specSheets/3717.html
Ruger	LCP Purple Grip Frame	3725	NO	https://www.ruger.com/products/lcp/specSheets/3725.html

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Ruger	LCP Flat Dark Earth Grip Frame	3732	NO	https://www.ruger.com/products/lcp/specSheets/3732.html
Ruger	LCP Muddy Grip Camo Grip Frame	3734	NO	https://www.ruger.com/products/lcp/specSheets/3734.html
Ruger	LCP Savage Silver Cerakote®	3741	NO	https://www.ruger.com/products/lcp/specSheets/3741.html
Ruger	LCP Flat Dark Earth Grip Frame	3742	NO	https://www.ruger.com/products/lcp/specSheets/3742.html
Ruger	LCP Turquoise Cerakote® Grip Frame	3745	NO	https://www.ruger.com/products/lcp/specSheets/3745.html
Ruger	LCP Turquoise Cerakote® Grip Frame	3746	NO	https://www.ruger.com/products/lcp/specSheets/3746.html
Ruger	LCP Red-Anodized Skeletonized Aluminum Trigger	3755	NO	https://www.ruger.com/products/lcp/specSheets/3755.html
Ruger	LCP Cobalt Blue Aluminum Trigger	3760	NO	https://www.ruger.com/products/lcp/specSheets/3760.html
Ruger	LCP Desert Tan Grip Frame	3770	NO	https://www.ruger.com/products/lcp/specSheets/3770.html
Ruger	LCP Pink Grip Frame	13706	NO	https://www.ruger.com/products/lcp/specSheets/13706.html
Ruger	LCP II Viridian® E-Series™ Laser	3750	NO	https://www.ruger.com/products/lcp/specSheets/3750.html
Ruger	Viridian® E-Series™ Laser	3758	NO	https://www.ruger.com/products/lcp/specSheets/3758.html
Ruger	LCP II Viridian® E-Series™ Green Laser	13711	NO	https://www.ruger.com/products/lcp/specSheets/13711.html
Ruger	LCP II Muddy Grip® Camo	3757	NO	https://www.ruger.com/products/lcp/specSheets/3757.html
Ruger	LCP II Savage Silver Cerakote®	3759	NO	https://www.ruger.com/products/lcp/specSheets/3759.html
Ruger	LCP II Jungle Green Cerakote® Slide	3779	NO	https://www.ruger.com/products/lcp/specSheets/3779.html
Ruger	LCP II Rose Gold PVD Stainless Slide	3781	NO	https://www.ruger.com/products/lcp/specSheets/3781.html
Ruger	LCP II Flat Dark Earth Slide and Grip Frame	3786	NO	https://www.ruger.com/products/lcp/specSheets/3786.html
Ruger	LCP II Sapphire PVD Stainless Slide	3788	NO	https://www.ruger.com/products/lcp/specSheets/3788.html
Ruger	LCP II Turquoise PVD Stainless Slide	3789	NO	https://www.ruger.com/products/lcp/specSheets/3789.html
Ruger	LCP II Flat Dark Earth Grip Frame	3792	NO	https://www.ruger.com/products/lcp/specSheets/3792.html
Ruger	LCP II One Nation Camo Dipped Slide	3794	NO	https://www.ruger.com/products/lcp/specSheets/3794.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Ruger	LCP II Rose Gold Cerakote® Grip Frame and Slide	13702	NO	https://www.ruger.com/products/lcp/ll/specSheets/13702.html
Ruger	LCP II Pink Frame and Satin Aluminum Cerakote® Slide	13707	NO	https://www.ruger.com/products/lcp/ll/specSheets/13707.html
Ruger	EC9	13211	NO	https://www.ruger.com/products/ec9/specSheets/13211.html
Ruger	EC9 Purple, High Performance, Glass-Filled Nylon	3295	NO	https://www.ruger.com/products/ec9/specSheets/3295.html
Ruger	EC9 Flat Dark Earth, High Performance, Glass-Filled Nylon	3297	NO	https://www.ruger.com/products/ec9/specSheets/3297.html
Ruger	EC9 Turquoise, High Performance, Glass-Filled Nylon	13200	NO	https://www.ruger.com/products/ec9/specSheets/13200.html
Ruger	EC9 Gray, High Performance, Glass-Filled Nylon	13201	NO	https://www.ruger.com/products/ec9/specSheets/13201.html
Ruger	EC9 Muddy Girl® Camo, High Performance, Glass-Filled Nylon	3288	NO	https://www.ruger.com/products/ec9/specSheets/3288.html
Ruger	EC9 Davidson's Brown Cerakote	3289	NO	https://www.ruger.com/products/ec9/specSheets/3289.html
Ruger	EC9 Savage Silver Cerakote®, High Performance, Glass-Filled Nylon	3290	NO	https://www.ruger.com/products/ec9/specSheets/3290.html
Ruger	EC9 Cobalt Kinetic Slate Cerakote®, High Performance, Glass-Filled Nylon	3291	NO	https://www.ruger.com/products/ec9/specSheets/3291.html
Ruger	EC9 Pink, High Performance, Glass-Filled Nylon	3296	NO	https://www.ruger.com/products/ec9/specSheets/3296.html
Ruger	EC9 Pink, Black Oxide	13203	NO	https://www.ruger.com/products/ec9/specSheets/13203.html
Ruger	EC9 Battleworn Flag Cerakote®, High Performance, Glass-Filled Nylon	13213	NO	https://www.ruger.com/products/ec9/specSheets/13213.html
Ruger	LC9	3235	NO	https://www.ruger.com/products/lc9/specSheets/3235.html
Ruger	LC380	3253	YES	https://www.ruger.com/products/lc380/specSheets/3253.html
Ruger	Security-9 Compact Pro	3815	NO	https://www.ruger.com/products/security9/specSheets/3815.html
Ruger	Security-9 Pro	3825	NO	https://www.ruger.com/products/security9/specSheets/3825.html
Ruger	Security-9 Standard	3870	NO	https://www.ruger.com/products/security9/specSheets/3870.html
Ruger	Security-9 Compact	3818	NO	https://www.ruger.com/products/security9/specSheets/3818.html
Ruger	Security-9 Standard	3811	NO	https://www.ruger.com/products/security9/specSheets/3811.html
Ruger	Security-9 Compact with Viridian® E-Series™ Red Laser	3830	NO	https://www.ruger.com/products/security9/specSheets/3830.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, examp)?	LINK TO PRODUCT
Ruger	Security-9 Compact with Hogue® Grip Sleeve	3829	NO	https://www.ruger.com/products/security9/specSheets/3829.html
Ruger	Security-9 Viridian® E-Series™ Red Laser	3816	NO	https://www.ruger.com/products/security9/specSheets/3816.html
Ruger	Security-9 Hogue® Grip Sleeve	3819	NO	https://www.ruger.com/products/security9/specSheets/3819.html
Ruger	Security-9 Davidson's Dark Earth Cerakote® Compact	3832	NO	https://www.ruger.com/products/security9/specSheets/3832.html
Ruger	Security-9 Compact with Turquoise Grip Frame	3837	NO	https://www.ruger.com/products/security9/specSheets/3837.html
Ruger	Security-9 Compact with Turquoise Grip Frame and Silver Cerakote® Slide	3838	NO	https://www.ruger.com/products/security9/specSheets/3838.html
Ruger	Security-9 Battlemorn Flag Cerakote®	3840	NO	https://www.ruger.com/products/security9/specSheets/3840.html
Ruger	Security-9 Davidson's Dark Earth Cerakote®	3813	NO	https://www.ruger.com/products/security9/specSheets/3813.html
Ruger	Security-9 Turquoise Grip Frame	3821	NO	https://www.ruger.com/products/security9/specSheets/3821.html
Ruger	Security-9 Savage Silver Cerakote® Slide	3822	NO	https://www.ruger.com/products/security9/specSheets/3822.html
Ruger	Security-9 Cobalt Kinetic Slate Grip Frame	3824	NO	https://www.ruger.com/products/security9/specSheets/3824.html
Ruger	Security-9 Coyote Brown Cerakote®	3826	NO	https://www.ruger.com/products/security9/specSheets/3826.html
Ruger	Security-9 Jungle Green Cerakote®	3827	NO	https://www.ruger.com/products/security9/specSheets/3827.html
Ruger	RUGER AMERICAN® PISTOL Pro Model 4.20" 9mm	8605	NO	https://www.ruger.com/products/rugerAmericanPistol/specSheets/8605.html
Ruger	RUGER AMERICAN® PISTOL Pro Model 4.50" 9mm	8615	NO	https://www.ruger.com/products/rugerAmericanPistol/specSheets/8615.html
Ruger	RUGER AMERICAN® PISTOL Pro Model 4.50" 45 auto	8618	NO	https://www.ruger.com/products/rugerAmericanPistol/specSheets/8618.html
Ruger	Ruger American® Pistol Compact 3.75" 45 auto	8649	NO	https://www.ruger.com/products/rugerAmericanPistolCompact/specSheets/8649.html
Ruger	Ruger American® Pistol Compact 3.75" 9mm	8683	NO	https://www.ruger.com/products/rugerAmericanPistolCompact/specSheets/8683.html
Ruger	Ruger American® Pistol Compact 3.55" 9mm	8682	NO	https://www.ruger.com/products/rugerAmericanPistolCompact/specSheets/8682.html
Ruger	Ruger American® Pistol Competition	8672	NO	https://www.ruger.com/products/rugerAmericanPistolCompetition/specSheets/8672.html
Ruger	SR1911® Full-Size Hardwood	6700	NO	https://www.ruger.com/products/sr1911Standard/specSheets/6700.html
Ruger	SR1911® Full-Size Black Nitride	6715	NO	https://www.ruger.com/products/sr1911Standard/specSheets/6715.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp?)	LINK TO PRODUCT
Ruger	SR1911® Full-Size White Chevron Ivory/ite	6756	NO	https://www.ruger.com/products/sr1911Standard/specSheets/6756.html
Ruger	SR1911® Officer-Style Deluxe 9mm	6758	NO	https://www.ruger.com/products/sr1911OfficerStyle/specSheets/6758.html
Ruger	SR1911® Officer-Style 4.5 auto	6762	NO	https://www.ruger.com/products/sr1911OfficerStyle/specSheets/6762.html
Ruger	SR1911® Target 4.5 Auto	6736	NO	https://www.ruger.com/products/sr1911Target/specSheets/6736.html
Ruger	SR1911® Target 10mm Auto	6739	NO	https://www.ruger.com/products/sr1911Target/specSheets/6739.html
Ruger	SR1911® Target 9mm Luger	6759	NO	https://www.ruger.com/products/sr1911Target/specSheets/6759.html
Ruger	SR1911® Competition 9mm Luger	6766	NO	https://www.ruger.com/products/sr1911Competition/specSheets/6766.html
Ruger	SR1911® Competition 4.5 Auto	6776	NO	https://www.ruger.com/products/sr1911Competition/specSheets/6776.html
Ruger	SR1911® Commander-Style 4.5 Auto	6702	NO	https://www.ruger.com/products/sr1911CommanderStyle/specSheets/6702.html
Ruger	SR1911® Lightweight Commander-Style 4.5 Auto	6711	NO	https://www.ruger.com/products/sr1911CommanderStyle/specSheets/6711.html
Ruger	SR1911® Commander-Style 9mm Luger	6722	NO	https://www.ruger.com/products/sr1911CommanderStyle/specSheets/6722.html
Ruger	SR1911® Commander-Style Enhanced Micarta Grips 4.5 Auto	6720	NO	https://www.ruger.com/products/sr1911CommanderStyle/specSheets/6720.html
Ruger	SR22	3604	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3604.html
Ruger	SR22 TB	3604	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3604.html
Ruger	SR22 Silver Anodize	3607	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3607.html
Ruger	SR22 4.50"	3620	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3620.html
Ruger	SR22 American Flag Cerakote	3642	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3642.html
Ruger	SR22 One Naiton Camo Polymer	3643	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3643.html
Ruger	SR22 Copper Suede Cerakote® Polymer	3651	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3651.html
Ruger	SR22 Polar Blue Cerakote® Polymer	3653	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3653.html
Ruger	SR22 Gold PVD	3654	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3654.html
Ruger	SR22 Purple Polymer	3606	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3606.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Ruger	SR22 Flat Dark Earth Polymer	3613	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3613.html
Ruger	SR22 Red Titanium Cerakote® Polymer	3622	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3622.html
Ruger	SR22 Turquoise Cerakote® Polymer	3625	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3625.html
Ruger	SR22 Farmer Green Polymer	3629	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3629.html
Ruger	SR22 Savage Silver Cerakote® Polymer	3630	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3630.html
Ruger	SR22 Elite Earth Cerakote® Polymer	3641	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3641.html
Ruger	SR22 Rose Gold Cerakote® Polymer	3647	NO	https://www.ruger.com/products/sr22Pistol/specSheets/3647.html
Ruger	Mark IV™ Standard 4.75"	40104	NO	https://www.ruger.com/products/markIVStandard/specSheets/40104.html
Ruger	Mark IV™ Standard 6"	40105	NO	https://www.ruger.com/products/markIVStandard/specSheets/40105.html
Ruger	Mark IV™ Tactical Aluminum	40150	NO	https://www.ruger.com/products/markIVTactical/specSheets/40150.html
Ruger	Mark IV™ Target Stainless Steel	40103	NO	https://www.ruger.com/products/markIVTarget/specSheets/40103.html
Ruger	Mark IV™ Target TB	40126	NO	https://www.ruger.com/products/markIVTarget/specSheets/40126.html
Ruger	Mark IV™ Target Target Laminate	40159	NO	https://www.ruger.com/products/markIVTarget/specSheets/40159.html
Ruger	Mark IV™ Target Aluminum 14"	40173	NO	https://www.ruger.com/products/markIVTarget/specSheets/40173.html
Ruger	Mark IV™ Target Stainless Steel 1.4"	40174	NO	https://www.ruger.com/products/markIVTarget/specSheets/40174.html
Ruger	Mark IV™ 22/45™	40107	NO	https://www.ruger.com/products/markIV2245/specSheets/40107.html
Ruger	LCR® 38 Spl +P	5401	YES	https://www.ruger.com/products/lcr/specSheets/5401.html
Ruger	LCR® 22 LR	5410	YES	https://www.ruger.com/products/lcr/specSheets/5410.html
Ruger	LCR® 22 WMR	5414	YES	https://www.ruger.com/products/lcr/specSheets/5414.html
Ruger	LCR® 357 Mag	5450	YES	https://www.ruger.com/products/lcr/specSheets/5450.html
Ruger	LCR® 327 Fed Mag	5452	YES	https://www.ruger.com/products/lcr/specSheets/5452.html
Ruger	LCR® 9mm Luger	5456	YES	https://www.ruger.com/products/lcr/specSheets/5456.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Ruger	LCR@ 38 Spl +P Pink	5409	NO	https://www.ruger.com/products/lcr/specSheets/5409.html
Ruger	LCRx 38 Spl +P	5430	YES	https://www.ruger.com/products/lcr/specSheets/5430.html
Ruger	LCRx 38 Spl +P Hogue@ Tamer™ Monogrip®	5431	YES	https://www.ruger.com/products/lcr/specSheets/5431.html
Ruger	LCRx 22 LR	5435	NO	https://www.ruger.com/products/lcr/specSheets/5435.html
Ruger	LCRx 22 WMR 3"	5437	YES	https://www.ruger.com/products/lcr/specSheets/5437.html
Ruger	LCRx 22 WMR 1.87"	5439	YES	https://www.ruger.com/products/lcr/specSheets/5439.html
Ruger	LCRx 357 Mag 3"	5444	YES	https://www.ruger.com/products/lcr/specSheets/5444.html
Ruger	LCRx 357 Mag 1.87"	5460	YES	https://www.ruger.com/products/lcr/specSheets/5460.html
Ruger	LCRx 327 Fed Mag	5462	YES	https://www.ruger.com/products/lcr/specSheets/5462.html
Ruger	LCRx 9mm Luger	5464	YES	https://www.ruger.com/products/lcr/specSheets/5464.html
Ruger	LCRx 22 WMR	5465	NO	https://www.ruger.com/products/lcr/specSheets/5465.html
Ruger	Ruger SP101	5718	NO	https://www.ruger.com/products/sp101/specSheets/5718.html
Ruger	Ruger SP101	5719	YES	https://www.ruger.com/products/sp101/specSheets/5719.html
Ruger	Ruger SP101	5720	YES	https://www.ruger.com/products/sp101/specSheets/5720.html
Ruger	Ruger SP101	5737	YES	https://www.ruger.com/products/sp101/specSheets/5737.html
Ruger	Ruger SP101	5765	YES	https://www.ruger.com/products/sp101/specSheets/5765.html
Ruger	Ruger SP101	5771	YES	https://www.ruger.com/products/sp101/specSheets/5771.html
Ruger	Ruger SP101	5773	YES	https://www.ruger.com/products/sp101/specSheets/5773.html
Ruger	Ruger SP101	5783	YES	https://www.ruger.com/products/sp101/specSheets/5783.html
Ruger	Ruger SP101	5784	NO	https://www.ruger.com/products/sp101/specSheets/5784.html
Ruger	Ruger SP101	15702	NO	https://www.ruger.com/products/sp101/specSheets/15702.html
Ruger	Ruger SP101	5764	NO	https://www.ruger.com/products/sp101/specSheets/5764.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Ruger	Ruger SP101	5774	NO	https://www.ruger.com/products/sp101/specSheets/5774.html
Ruger	Ruger SP101	15704	NO	https://www.ruger.com/products/sp101/specSheets/15704.html
Ruger	Ruger SP101	15707	NO	https://www.ruger.com/products/sp101/specSheets/15707.html
Ruger	Ruger SP101	15710	NO	https://www.ruger.com/products/sp101/specSheets/15710.html
Ruger	Ruger SP101® Match Champion®	5782	YES	https://www.ruger.com/products/sp101MatchChampion/specSheets/5782.html
Ruger	Ruger SP101® Match Champion®	5785	YES	https://www.ruger.com/products/sp101MatchChampion/specSheets/5785.html
Ruger	GP100	1702	YES	https://www.ruger.com/products/gp100/specSheets/1702.html
Ruger	GP100	1704	YES	https://www.ruger.com/products/gp100/specSheets/1704.html
Ruger	GP100	1705	YES	https://www.ruger.com/products/gp100/specSheets/1705.html
Ruger	GP100	1707	YES	https://www.ruger.com/products/gp100/specSheets/1707.html
Ruger	GP100	1715	YES	https://www.ruger.com/products/gp100/specSheets/1715.html
Ruger	GP100	1757	YES	https://www.ruger.com/products/gp100/specSheets/1757.html
Ruger	GP100	1771	NO	https://www.ruger.com/products/gp100/specSheets/1771.html
Ruger	GP100	1773	NO	https://www.ruger.com/products/gp100/specSheets/1773.html
Ruger	GP100	1774	NO	https://www.ruger.com/products/gp100/specSheets/1774.html
Ruger	GP100	1783	NO	https://www.ruger.com/products/gp100/specSheets/1783.html
Ruger	GP100	1784	NO	https://www.ruger.com/products/gp100/specSheets/1784.html
Ruger	GP100	1740	NO	https://www.ruger.com/products/gp100/specSheets/1740.html
Ruger	GP100	1753	NO	https://www.ruger.com/products/gp100/specSheets/1753.html
Ruger	GP100	1759	NO	https://www.ruger.com/products/gp100/specSheets/1759.html
Ruger	GP100	1762	NO	https://www.ruger.com/products/gp100/specSheets/1762.html
Ruger	GP100	1763	NO	https://www.ruger.com/products/gp100/specSheets/1763.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Ruger	GP100	1768	NO	https://www.ruger.com/products/ap100/specSheets/1768.html
Ruger	GP100	1769	NO	https://www.ruger.com/products/ap100/specSheets/1769.html
Ruger	GP100	1770	NO	https://www.ruger.com/products/ap100/specSheets/1770.html
Ruger	GP100	1772	NO	https://www.ruger.com/products/ap100/specSheets/1772.html
Ruger	GP100	1777	NO	https://www.ruger.com/products/ap100/specSheets/1777.html
Ruger	GP100	1780	NO	https://www.ruger.com/products/ap100/specSheets/1780.html
Ruger	GP100	1782	NO	https://www.ruger.com/products/ap100/specSheets/1782.html
Ruger	GP100 Match Champion	1754	YES	https://www.ruger.com/products/ap100MatchChampion/specSheets/1754.html
Ruger	GP100 Match Champion	1755	YES	https://www.ruger.com/products/ap100MatchChampion/specSheets/1755.html
Ruger	GP100 Match Champion	1775	YES	https://www.ruger.com/products/ap100MatchChampion/specSheets/1775.html
Ruger	GP100 Match Champion	1786	NO	https://www.ruger.com/products/ap100MatchChampion/specSheets/1786.html
Ruger	Super GP100	5065	YES	https://www.ruger.com/products/superGP100/specSheets/5065.html
Ruger	Super GP100	5066	NO	https://www.ruger.com/products/superGP100/specSheets/5066.html
Ruger	Redhawk	5041	YES	https://www.ruger.com/products/redhawk/specSheets/5041.html
Ruger	Redhawk	5043	YES	https://www.ruger.com/products/redhawk/specSheets/5043.html
Ruger	Redhawk	5044	YES	https://www.ruger.com/products/redhawk/specSheets/5044.html
Ruger	Redhawk	5050	YES	https://www.ruger.com/products/redhawk/specSheets/5050.html
Ruger	Redhawk	5051	YES	https://www.ruger.com/products/redhawk/specSheets/5051.html
Ruger	Redhawk	5059	YES	https://www.ruger.com/products/redhawk/specSheets/5059.html
Ruger	Redhawk	5060	YES	https://www.ruger.com/products/redhawk/specSheets/5060.html
Ruger	Redhawk	5028	YES	https://www.ruger.com/products/redhawk/specSheets/5028.html
Ruger	Redhawk	5049	NO	https://www.ruger.com/products/redhawk/specSheets/5049.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Ruger	Super Redhawk	5501	YES	https://www.ruger.com/products/superRedhawkStandard/specSheets/5501.html
Ruger	Super Redhawk	5502	YES	https://www.ruger.com/products/superRedhawkStandard/specSheets/5502.html
Ruger	Super Redhawk	5505	YES	https://www.ruger.com/products/superRedhawkStandard/specSheets/5505.html
Ruger	Super Redhawk	5507	YES	https://www.ruger.com/products/superRedhawkStandard/specSheets/5507.html
Ruger	Super Redhawk	5517	NO	https://www.ruger.com/products/superRedhawkStandard/specSheets/5517.html
Ruger	Super Redhawk	5520	NO	https://www.ruger.com/products/superRedhawkStandard/specSheets/5520.html
Ruger	Super Redhawk	5522	NO	https://www.ruger.com/products/superRedhawkStandard/specSheets/5522.html
Ruger	Super Redhawk Alaskan	5301	YES	https://www.ruger.com/products/superRedhawkAlaskan/specSheets/5301.html
Ruger	Super Redhawk Alaskan	5302	YES	https://www.ruger.com/products/superRedhawkAlaskan/specSheets/5302.html
Ruger	Super Redhawk Alaskan	5303	YES	https://www.ruger.com/products/superRedhawkAlaskan/specSheets/5303.html
Ruger	Bearcat	912	YES	https://www.ruger.com/products/newBearcat/specSheets/0912.html
Ruger	Bearcat	913	YES	https://www.ruger.com/products/newBearcat/specSheets/0913.html
Ruger	Bearcat	915	YES	https://www.ruger.com/products/newBearcat/specSheets/0915.html
Ruger	Bearcat	916	YES	https://www.ruger.com/products/newBearcat/specSheets/0916.html
Ruger	Bearcat	917	YES	https://www.ruger.com/products/newBearcat/specSheets/0917.html
Ruger	Bearcat	918	YES	https://www.ruger.com/products/newBearcat/specSheets/0918.html
Ruger	Bearcat	921	YES	https://www.ruger.com/products/newBearcat/specSheets/0921.html
Ruger	Bearcat	922	YES	https://www.ruger.com/products/wrangler/specSheets/2002.html
Ruger	Wrangler	2003	YES	https://www.ruger.com/products/wrangler/specSheets/2003.html
Ruger	Wrangler	2004	YES	https://www.ruger.com/products/wrangler/specSheets/2004.html
Ruger	Wrangler	2008	YES	https://www.ruger.com/products/wrangler/specSheets/2008.html
Ruger	Wrangler	2014	YES	https://www.ruger.com/products/wrangler/specSheets/2014.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Ruger	Wrangler	2021	YES	https://www.ruger.com/products/wrangler/specSheets/2021.html
Ruger	Wrangler	2022	YES	https://www.ruger.com/products/wrangler/specSheets/2022.html
Ruger	Wrangler	2023	YES	https://www.ruger.com/products/wrangler/specSheets/2023.html
Ruger	Wrangler	2024	YES	https://www.ruger.com/products/wrangler/specSheets/2024.html
Ruger	Wrangler	2025	YES	https://www.ruger.com/products/wrangler/specSheets/2025.html
Ruger	Wrangler	2026	YES	https://www.ruger.com/products/wrangler/specSheets/2026.html
Ruger	Single-Ten	8100	YES	https://www.ruger.com/products/newModelSingleSixSingleTen/specSheets/8100.html
Ruger	Single-Ten	8101	YES	https://www.ruger.com/products/newModelSingleSixSingleTen/specSheets/8101.html
Ruger	Single-Ten	8102	YES	https://www.ruger.com/products/newModelSingleSixSingleTen/specSheets/8102.html
Ruger	Single-Six Convertible	621	YES	https://www.ruger.com/products/newModelSingleSixConvertible/specSheets/0621.html
Ruger	Single-Six Convertible	622	YES	https://www.ruger.com/products/newModelSingleSixConvertible/specSheets/0622.html
Ruger	Single-Six Convertible	623	YES	https://www.ruger.com/products/newModelSingleSixConvertible/specSheets/0623.html
Ruger	Single-Six Convertible	624	YES	https://www.ruger.com/products/newModelSingleSixConvertible/specSheets/0624.html
Ruger	Single-Six Convertible	625	YES	https://www.ruger.com/products/newModelSingleSixConvertible/specSheets/0625.html
Ruger	Single-Six Convertible	626	YES	https://www.ruger.com/products/newModelSingleSixConvertible/specSheets/0626.html
Ruger	Single-Six Convertible	629	YES	https://www.ruger.com/products/newModelSingleSixConvertible/specSheets/0629.html
Ruger	Single-Six Convertible	627	YES	https://www.ruger.com/products/newModelSingleSixConvertible/specSheets/0627.html
Ruger	Single-Six Convertible	676	YES	https://www.ruger.com/products/newModelSingleSixConvertible/specSheets/0676.html
Ruger	Single-Six Convertible	683	YES	https://www.ruger.com/products/newModelSingleSixConvertible/specSheets/0683.html
Ruger	Single-Nine	8150	YES	https://www.ruger.com/products/newModelSingleSixSingleNine/specSheets/8150.html
Ruger	New Model Single-Six	661	YES	https://www.ruger.com/products/newModelSingleSix/specSheets/0661.html
Ruger	New Model Single-Six	662	YES	https://www.ruger.com/products/newModelSingleSix/specSheets/0662.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Ruger	New Model Single-Six	6538	YES	https://www.ruger.com/products/newModelSingleSix/specSheets/6538.html
Ruger	Single-Seven	8160	YES	https://www.ruger.com/products/newModelSingleSixSingleSeven/specSheets/8160.html
Ruger	Single-Seven	8161	YES	https://www.ruger.com/products/newModelSingleSixSingleSeven/specSheets/8161.html
Ruger	Single-Seven	8162	YES	https://www.ruger.com/products/newModelSingleSixSingleSeven/specSheets/8162.html
Ruger	Single-Seven	8163	YES	https://www.ruger.com/products/newModelSingleSixSingleSeven/specSheets/8163.html
Ruger	Single-Seven	8164	YES	https://www.ruger.com/products/newModelSingleSixSingleSeven/specSheets/8164.html
Ruger	Single-Seven	8165	YES	https://www.ruger.com/products/newModelSingleSixSingleSeven/specSheets/8165.html
Ruger	New Model Blackhawk Blued	306	YES	https://www.ruger.com/products/newModelBlackhawkBlued/specSheets/0306.html
Ruger	New Model Blackhawk Blued	316	YES	https://www.ruger.com/products/newModelBlackhawkBlued/specSheets/0316.html
Ruger	New Model Blackhawk Blued	405	YES	https://www.ruger.com/products/newModelBlackhawkBlued/specSheets/0405.html
Ruger	New Model Blackhawk Blued	406	YES	https://www.ruger.com/products/newModelBlackhawkBlued/specSheets/0406.html
Ruger	New Model Blackhawk Blued	445	YES	https://www.ruger.com/products/newModelBlackhawkBlued/specSheets/0445.html
Ruger	New Model Blackhawk Blued	455	YES	https://www.ruger.com/products/newModelBlackhawkBlued/specSheets/0455.html
Ruger	New Model Blackhawk Blued	465	YES	https://www.ruger.com/products/newModelBlackhawkBlued/specSheets/0465.html
Ruger	New Model Blackhawk Blued	505	YES	https://www.ruger.com/products/newModelBlackhawkBlued/specSheets/0505.html
Ruger	New Model Super Blackhawk Bisley	818	YES	https://www.ruger.com/products/newModelSuperBlackhawkBisley/specSheets/0818.html
Ruger	New Model Super Blackhawk Bisley	870	YES	https://www.ruger.com/products/newModelSuperBlackhawkBisley/specSheets/0870.html
Ruger	New Model Super Blackhawk Bisley	871	YES	https://www.ruger.com/products/newModelSuperBlackhawkBisley/specSheets/0871.html
Ruger	New Model Super Blackhawk Bisley	872	YES	https://www.ruger.com/products/newModelSuperBlackhawkBisley/specSheets/0872.html
Ruger	New Model Super Blackhawk Bisley	873	YES	https://www.ruger.com/products/newModelSuperBlackhawkBisley/specSheets/0873.html
Ruger	New Model Super Blackhawk Hunter	860	YES	https://www.ruger.com/products/newModelSuperBlackhawkHunter/specSheets/0860.html
Ruger	New Model Super Blackhawk Bisley Hunter	862	YES	https://www.ruger.com/products/newModelSuperBlackhawkBisleyHunter/specSheets/0862.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Ruger	New Model Blackhawk Convertible	308	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/0308.html
Ruger	New Model Blackhawk Convertible	318	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/0318.html
Ruger	New Model Blackhawk Convertible	446	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/0446.html
Ruger	New Model Blackhawk Convertible	463	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/0463.html
Ruger	New Model Blackhawk Convertible	310	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/0310.html
Ruger	New Model Blackhawk Convertible	320	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/0320.html
Ruger	New Model Blackhawk Convertible	333	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/0333.html
Ruger	New Model Blackhawk Convertible	472	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/0472.html
Ruger	New Model Blackhawk Convertible	474	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/0474.html
Ruger	New Model Blackhawk Convertible	475	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/0475.html
Ruger	New Model Blackhawk Convertible	476	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/0476.html
Ruger	New Model Blackhawk Convertible	477	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/0477.html
Ruger	New Model Blackhawk Convertible	5240	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/5240.html
Ruger	New Model Blackhawk Convertible	5241	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/5241.html
Ruger	New Model Blackhawk Convertible	5242	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/5242.html
Ruger	New Model Blackhawk Convertible	5243	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/5243.html
Ruger	New Model Blackhawk Convertible	5244	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/5244.html
Ruger	New Model Blackhawk Convertible	5245	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/5245.html
Ruger	New Model Blackhawk Convertible	5246	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/5246.html
Ruger	New Model Blackhawk Convertible	5247	YES	https://www.ruger.com/products/newModelBlackhawkConvertible/specSheets/5247.html
Ruger	New Model Blackhawk Stainless	309	YES	https://www.ruger.com/products/newModelBlackhawkStainless/specSheets/0309.html
Ruger	New Model Blackhawk Stainless	319	YES	https://www.ruger.com/products/newModelBlackhawkStainless/specSheets/0319.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, examp)?	LINK TO PRODUCT
Ruger	New Model Blackhawk Stainless	460	YES	https://www.ruger.com/products/newModelBlackhawkStainless/specSheets/0460.html
Ruger	New Model Blackhawk Bisley	5235	YES	https://www.ruger.com/products/newModelBlackhawkBisley/specSheets/5235.html
Ruger	New Model Blackhawk Bisley	5236	YES	https://www.ruger.com/products/newModelBlackhawkBisley/specSheets/5236.html
Ruger	New Model Blackhawk Bisley	5249	YES	https://www.ruger.com/products/newModelBlackhawkBisley/specSheets/5249.html
Ruger	New Model Super Blackhawk	802	YES	https://www.ruger.com/products/newModelSuperBlackhawkStandard/specSheets/0802.html
Ruger	New Model Super Blackhawk	804	YES	https://www.ruger.com/products/newModelSuperBlackhawkStandard/specSheets/0804.html
Ruger	New Model Super Blackhawk	806	YES	https://www.ruger.com/products/newModelSuperBlackhawkStandard/specSheets/0806.html
Ruger	New Model Super Blackhawk	807	YES	https://www.ruger.com/products/newModelSuperBlackhawkStandard/specSheets/0807.html
Ruger	New Model Super Blackhawk	810	YES	https://www.ruger.com/products/newModelSuperBlackhawkStandard/specSheets/0810.html
Ruger	New Model Super Blackhawk	811	YES	https://www.ruger.com/products/newModelSuperBlackhawkStandard/specSheets/0811.html
Ruger	New Model Super Blackhawk	813	YES	https://www.ruger.com/products/newModelSuperBlackhawkStandard/specSheets/0813.html
Ruger	New Model Super Blackhawk	814	YES	https://www.ruger.com/products/newModelSuperBlackhawkStandard/specSheets/0814.html
Ruger	New Model Super Blackhawk	817	YES	https://www.ruger.com/products/newModelSuperBlackhawkStandard/specSheets/0817.html
Ruger	New Model Super Blackhawk	819	YES	https://www.ruger.com/products/newModelSuperBlackhawkStandard/specSheets/0819.html
Ruger	New Model Super Blackhawk	875	YES	https://www.ruger.com/products/newModelSuperBlackhawkStandard/specSheets/0875.html
Ruger	New Model Super Blackhawk Bisley	818	YES	https://www.ruger.com/products/newModelSuperBlackhawkBisley/specSheets/0818.html
Ruger	New Model Super Blackhawk Bisley	870	YES	https://www.ruger.com/products/newModelSuperBlackhawkBisley/specSheets/0870.html
Ruger	New Model Super Blackhawk Bisley	871	YES	https://www.ruger.com/products/newModelSuperBlackhawkBisley/specSheets/0871.html
Ruger	New Model Super Blackhawk Bisley	872	YES	https://www.ruger.com/products/newModelSuperBlackhawkBisley/specSheets/0872.html
Ruger	New Model Super Blackhawk Bisley	873	YES	https://www.ruger.com/products/newModelSuperBlackhawkBisley/specSheets/0873.html
Ruger	New Model Super Blackhawk Hunter	860	YES	https://www.ruger.com/products/newModelSuperBlackhawkHunter/specSheets/0860.html
Ruger	New Model Super Blackhawk Bisley Hunter	862	YES	https://www.ruger.com/products/newModelSuperBlackhawkBisleyHunter/specSheets/0862.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Ruger	Ruger Vaquero Blued	5101	YES	https://www.ruger.com/products/vaqueroBlued/specSheets/5101.html
Ruger	Ruger Vaquero Blued	5102	YES	https://www.ruger.com/products/vaqueroBlued/specSheets/5102.html
Ruger	Ruger Vaquero Blued	5106	YES	https://www.ruger.com/products/vaqueroBlued/specSheets/5106.html
Ruger	Ruger Vaquero Blued	5107	YES	https://www.ruger.com/products/vaqueroBlued/specSheets/5107.html
Ruger	Ruger Vaquero Blued	5153	YES	https://www.ruger.com/products/vaqueroBlued/specSheets/5153.html
Ruger	Ruger Vaquero Blued	5154	YES	https://www.ruger.com/products/vaqueroBlued/specSheets/5154.html
Ruger	Ruger Vaquero Blued	5161	YES	https://www.ruger.com/products/vaqueroBlued/specSheets/5161.html
Ruger	Ruger Vaquero Blued	5165	YES	https://www.ruger.com/products/vaqueroBlued/specSheets/5165.html
Ruger	Ruger Vaquero Stainless	5104	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5104.html
Ruger	Ruger Vaquero Stainless	5105	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5105.html
Ruger	Ruger Vaquero Stainless	5108	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5108.html
Ruger	Ruger Vaquero Stainless	5109	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5109.html
Ruger	Ruger Vaquero Stainless	5120	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5120.html
Ruger	Ruger Vaquero Stainless	5141	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5141.html
Ruger	Ruger Vaquero Stainless	5151	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5151.html
Ruger	Ruger Vaquero Stainless	5152	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5152.html
Ruger	Ruger Vaquero Stainless	5157	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5157.html
Ruger	Ruger Vaquero Stainless	5158	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5158.html
Ruger	Ruger Vaquero Stainless	5159	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5159.html
Ruger	Ruger Vaquero Stainless	5162	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5162.html
Ruger	Ruger Vaquero Stainless	5163	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/5163.html
Ruger	Ruger Vaquero Stainless	10596	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/10596.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Ruger	Ruger Vaquero Stainless	10598	YES	https://www.ruger.com/products/vaqueroStainless/specSheets/10598.html
Ruger	Bisley Ruger Vaquero	5129	YES	https://www.ruger.com/products/vaqueroBisley/specSheets/5129.html
Ruger	Bisley Ruger Vaquero	5130	YES	https://www.ruger.com/products/vaqueroBisley/specSheets/5130.html
Ruger	SASS Ruger Vaquero	5133	YES	https://www.ruger.com/products/vaqueroSASS/specSheets/5133.html
Ruger	SASS Ruger Vaquero	5134	YES	https://www.ruger.com/products/vaqueroSASS/specSheets/5134.html
Sig Sauer	1911 TACOPS Full-Size	1911R-45-TACOPS-TB	NO	https://www.sigsauger.com/store/1911-tacops-full-size.html
Sig Sauer	P320 AXG Scorpion	320AXGCA-9-CW-SCPN-R2-10	NO	https://www.sigsauger.com/p320-axg-scorpion.html
Sig Sauer	P365 XL ROMEOZERO	365XL-9-BXR3-RXZ-10	NO	https://www.sigsauger.com/p365-xl-romeo-zero.html
Sig Sauer	P320 RXP Compact	320C-9-B-RXP-10	NO	https://www.sigsauger.com/p320-rxp-compact.html
Sig Sauer	P365 XL	365XL-9-BXR3-10	NO	https://www.sigsauger.com/p365-xl.html
Sig Sauer	P320 RXP Full-Size	320XF-9-BXR3-RXP-10	NO	https://www.sigsauger.com/p320-rxp-full-size.html
Sig Sauer	P320 RXP Full-Size	320F-9-B-RXP-10	NO	https://www.sigsauger.com/p320-rxp-full-size.html
Sig Sauer	P320 RXP XCOMPACT	320F-9-B-RXP-10	NO	https://www.sigsauger.com/p320-rxp-full-size.html
Sig Sauer	P320-M18	320CA-9-M18-MS-10	NO	https://www.sigsauger.com/p320-m18.html
Sig Sauer	P365 SAS	365-9-SAS	NO	https://www.sigsauger.com/p365-sas.html
Sig Sauer	P320 XFULL	320XF-9-BXR3-R2-10	NO	https://www.sigsauger.com/p320-xfull-size.html
Sig Sauer	P320 XFIVE LEGION	320X5-9-LEGION-R2-10	NO	https://www.sigsauger.com/p320-xfive-legion.html
Sig Sauer	P938 SAS Micro-Compact	938-9-SAS2B	NO	https://www.sigsauger.com/p938-sas2b-micro-compact.html
Sig Sauer	P938 Spartan II Micro-Compact	938-9-SPARTANII-AMBI	NO	https://www.sigsauger.com/p938-spartan-ii-micro-compact.html
Sig Sauer	P238 Spartan II Micro-Compact	238-380-SPARTANII	NO	https://www.sigsauger.com/p238-spartan-ii-micro-compact.html
Sig Sauer	P365 NITRON MICRO-COMPACT	365-9-BXR3-MS-MA	NO	https://www.sigsauger.com/p365-nitron-micro-compact.html
Sig Sauer	1911 Spartan II Carry	1911CAR-45-SPARTANII	NO	https://www.sigsauger.com/1911-spartan-ii-carry.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Sig Sauer	1911 Spartan II Full-Size	1911R-45-SPARTANII	NO	https://www.sigsauger.com/1911-spartan-ii-full-size.html
Sig Sauer	P210 Standard	210A-9-B	NO	https://www.sigsauger.com/p210-standard.html
Sig Sauer	P320 XCOMPACT	320XC-9-BXR3-R2-10	NO	https://www.sigsauger.com/p320-xcompact.html
Sig Sauer	P320-M17	320F-9-M17-MS-10	NO	https://www.sigsauger.com/p320-m17.html
Sig Sauer	M17-COMMEMORATIVE	M17-COMMEMORATIVE	NO	https://www.sigsauger.com/m17-commemorative.html
Sig Sauer	P938 LEGION Micro-Compact	938-9-LEGION	NO	https://www.sigsauger.com/p938-legion-micro-compact.html
Sig Sauer	P229 Legion Compact SAO	229R-9-LEGION-SAO	NO	https://www.sigsauger.com/p229-legion-compact-sao.html
Sig Sauer	P938 Select Micro-Compact	938-9-select-ambi	NO	https://www.sigsauger.com/p938-select-micro-compact.html
Sig Sauer	P226 Legion RXP Full-Size	226R-9-LEGION-SAO-RXP	NO	https://www.sigsauger.com/p226-legion-rx-full-size.html
Sig Sauer	P229 Legion RXP Compact	229R-9-LEGION-SAO-RXP	NO	https://www.sigsauger.com/p229-legion-rx-compact.html
Sig Sauer	P238 Select Micro-Compact	238-380-SEL	NO	https://www.sigsauger.com/p238-select-micro-compact.html
Sig Sauer	P226 Emperor Scorpion	E26R-9-ESCPN	NO	https://www.sigsauger.com/p226-emperor-scorpion.html
Sig Sauer	P320 X-VTAC	320XF-9-VTAC-R2	NO	https://www.sigsauger.com/p320-x-vtac.html
Sig Sauer	P210 Target	210A-9-TGT	NO	https://www.sigsauger.com/p210-target.html
Sig Sauer	P938 We The People	938-9-WTP	NO	https://www.sigsauger.com/p938-we-the-people.html
Sig Sauer	1911 We The People Full-Size	1911T-45-WTP	NO	https://www.sigsauger.com/1911-we-the-people-full-size.html
Sig Sauer	P220 Legion Carry SAO	220R3-45-1-LEGION-SAO	NO	https://www.sigsauger.com/p220-legion-carry-sao.html
Sig Sauer	P220 Legion Full-Size	220R5-10-LEGION	NO	https://www.sigsauger.com/p220-legion.html
Sig Sauer	P226 RX Full-Size	E26R-9-BSS-RX	NO	https://www.sigsauger.com/p226-rx-full-size.html
Sig Sauer	P226 MK25 Full-Size	MK-25-CA	YES	https://www.sigsauger.com/p226-mk25-full-size.html
Sig Sauer	P226 Legion Full-Size 9mm Luger	226R-9-LEGION	NO	https://www.sigsauger.com/p226-legion-full-size.html
Sig Sauer	P226 Nitron Full-Size	226R-9-BSS-CA	YES	https://www.sigsauger.com/p226-nitron-full-size.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Sig Sauer	P220 Nitron Full-Size	220R-45-BSS	NO	https://www.sigsauger.com/p220-nitron-full-size.html
Sig Sauer	P220 Nightmare Full-Size	220R-45-NMR-CW-500	NO	https://www.sigsauger.com/p220-nightmare-full-size.html
Sig Sauer	P226 Nightmare Full-Size	E26R-9-NMR-CW-500	NO	https://www.sigsauger.com/p226-nightmare-full-size.html
Sig Sauer	P229 Nightmare Compact	E29R-9-NMR-CW-500	NO	https://www.sigsauger.com/p229-nightmare-compact.html
Sig Sauer	P226 Equinox Full-Size	E26R-9-EQ-CW-500	NO	https://www.sigsauger.com/p226-equinox-full-size.html
Sig Sauer	P229 Equinox Compact	E29R-9-EQ-CW-300	NO	https://www.sigsauger.com/p229-equinox-compact-1.html
Sig Sauer	P938 Nightmare Micro-Compact	938-9-NMR-AMBI	NO	https://www.sigsauger.com/p938-nightmare-micro-compact.html
Sig Sauer	P320 Nitron Compact	320C-9-B-10	NO	https://www.sigsauger.com/p320-nitron-compact-3.html
Sig Sauer	P320 Nitron Full-Size	320F-9-B-10	NO	https://www.sigsauger.com/p320-nitron-full-size.html
Sig Sauer	P938 Blackwood Micro-Compact	938-9-BG-AMBI	NO	https://www.sigsauger.com/p938-blackwood-micro-compact.html
Sig Sauer	P938 BRG Micro-Compact	938-9-BRG-AMBI	NO	https://www.sigsauger.com/p938-brg-micro-compact.html
Sig Sauer	P229 Legion Compact	938-9-CBT	NO	https://www.sigsauger.com/p229-legion-compact.html
Sig Sauer	M11-A1 Compact	229RM-9-LEGION	NO	https://www.sigsauger.com/p229-legion-compact.html
Sig Sauer	P229 Nitron Compact	M11-A1-10	NO	https://www.sigsauger.com/p229-m11-a1-compact.html
Sig Sauer	P238 Desert Micro-Compact	229R-9-BSS-CA	YES	https://www.sigsauger.com/p229-nitron-compact.html
Sig Sauer	P238 Rainbow Micro-Compact	238-380-RBT	NO	https://www.sigsauger.com/p238-rainbow-micro-compact.html
Sig Sauer	P938 Nitron Micro-Compact	938-9-B-AMBI	NO	https://www.sigsauger.com/p938-nitron-micro-compact.html
Sig Sauer	P238 Nitron Micro-Compact	238-380-B	NO	https://www.sigsauger.com/p238-nitron-micro-compact.html
Sig Sauer	1911 Fastback Nightmare Carry	1911FCA-45-NMR	NO	https://www.sigsauger.com/1911-fastback-nightmare-carry.html
Sig Sauer	1911 Fastback Emperor Scorpion Carry	1911FTCA-45-ESCPN	NO	https://www.sigsauger.com/1911-fastback-emperor-scorpion-carry.html
Sig Sauer	1911 Emperor Scorpion Full-Size	1911R-45-ESCPN	NO	https://www.sigsauger.com/1911-emperor-scorpion-full-size.html
Sig Sauer	1911 STX Full-Size	1911-45-STX	NO	https://www.sigsauger.com/1911-stx-full-size.html

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Sig Sauer	1911 TACOPS Full-Size	1911R-10-TACOPS	NO	https://www.sigsauger.com/1911-tacops-full-size.html
Sig Sauer	SP2022 Nitron Full-Size	E2022-9-B	YES	https://www.sigsauger.com/sp2022-nitron-full-size.html
Sig Sauer	1911 (Blue) / Stainless Steel	not available	YES	https://oaag.ca.gov/firearms/handgun/1911-blued
Sig Sauer	1911 (Stainless) / Stainless Steel	not available	YES	https://oaag.ca.gov/firearms/handgun/1911-stainless
Sig Sauer	1911 Railed (Blue) / Stainless Steel	not available	YES	https://oaag.ca.gov/firearms/handgun/1911-target-railed-blued
Sig Sauer	1911 Target (Blue) / Stainless Steel	not available	YES	https://oaag.ca.gov/firearms/handgun/1911-target-blued
Sig Sauer	1911 Target (Stainless) / Stainless Steel	not available	YES	https://oaag.ca.gov/firearms/handgun/1911-target-stainless
Sig Sauer	1911 TTT (Two-tone/Wood Grip) / Stainless Steel	not available	YES	https://oaag.ca.gov/firearms/handgun/1911-ttt-two-tone-wood-grip
Sig Sauer	1911 XO (Blue) / Stainless Steel	not available	YES	https://oaag.ca.gov/firearms/handgun/1911-xo-blued
Sig Sauer	1911 XO (Stainless) / Stainless Steel	not available	YES	https://oaag.ca.gov/firearms/handgun/1911-xo-stainless
Sig Sauer	238-380-TSS1-CA / Stainless Steel; Alloy	238-380-TSS1-CA	YES	https://oaag.ca.gov/firearms/handgun/238-380-tss1-ca
Sig Sauer	P220 (Stainless) 220-45-SSS-CA / Stainless Steel	220-45-SSS-CA	YES	https://oaag.ca.gov/firearms/handgun/p220-stainless-220-45-sss-ca
Sig Sauer	P220R (Blue) / Stainless Steel; Alloy	not available	YES	https://oaag.ca.gov/firearms/handgun/p220r-blued
Sig Sauer	P220R (Equinox) 220R-45-EQ-CA / Alloy; Steel	220R-45-EQ-CA	YES	https://oaag.ca.gov/firearms/handgun/p220r-equinox-220r-45-eq-ca
Sig Sauer	P220R Carry (Blue) 220R3-45-B / Stainless Steel; Alloy	220R3-45-B	YES	https://oaag.ca.gov/firearms/handgun/p220r-carry-blued-220r3-45-b
Sig Sauer	P220R Carry (Equinox) / Stainless Steel; Alloy	not available	YES	https://oaag.ca.gov/firearms/handgun/p220r-carry-equinox
Sig Sauer	P220R Combat (Dark Earth) / Stainless Steel; Alloy	not available	YES	https://oaag.ca.gov/firearms/handgun/p220r-combat-dark-earth
Sig Sauer	P226 Scorpion 226R-9-SCPN-CA / Steel	not available	YES	https://oaag.ca.gov/firearms/handgun/p226-scorpion-226r-9-scpn-ca
Sig Sauer	P226 Extreme 226R-9-XTM-BLKGRY-CA / Steel	226R-9-XTM-BLKGRY-CA	YES	https://oaag.ca.gov/firearms/handgun/p226-extreme-226r-9-xtm-blkgr-ya
Sig Sauer	P226R 226R-40-BSS-CA / Alloy; Steel	226R-40-BSS-CA	YES	https://oaag.ca.gov/firearms/handgun/p226r-226r-40-bss-ca
Sig Sauer	P226R Equinox 226R-40-EQ / Stainless Steel; Alloy	226R-40-EQ	YES	https://oaag.ca.gov/firearms/handgun/p226r-equinox-226r-40-eq
Sig Sauer	P229R Enhanced Elite (Black) 229R-40-ESE-CA / Stainless Steel; Alloy	229R-40-ESE-CA	YES	https://oaag.ca.gov/firearms/handgun/p229r-enhanced-elite-black-229r-40-e-se-ca

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or example)?	LINK TO PRODUCT
Sig Sauer	P229R Enhanced Elite (Black) 229R-9-ESE-CA / Stainless Steel, Alloy	229R-9-ESE-CA	YES	https://oaq.ca.gov/firearms/handgun/p229r-enhanced-elite-black-229r-9-ese-ca
Sig Sauer	P232 (Stainless) 232-380-SSS / Stainless Steel	232-380-SSS	YES	https://oaq.ca.gov/firearms/handgun/p232-stainless-232-380-sss
Sig Sauer	P232 (Stainless) Hogue Grips / Stainless Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/p232-stainless-hogue-grips
Sig Sauer	P238 238-380-HD-CA / Stainless Steel	238-380-HD-CA	YES	https://oaq.ca.gov/firearms/handgun/p238-238-380-hd-ca
Sig Sauer	P238 238-380-HD2-CA / Stainless Steel	238-380-HD2-CA	YES	https://oaq.ca.gov/firearms/handgun/p238-238-380-hd2-ca
Sig Sauer	P238 238-380-TSS2-CA / Stainless Steel, Alloy	238-380-TSS2-CA	YES	https://oaq.ca.gov/firearms/handgun/p238-238-380-tss2-ca
Sig Sauer	P238 (Two-Tone) 238-380-TSS-CA / Stainless Steel, Alloy	238-380-TSS-CA	YES	https://oaq.ca.gov/firearms/handgun/p238-two-tone-238-380-tss-ca
Sig Sauer	P239 (Blue) / Stainless Steel, Alloy	not available	YES	https://oaq.ca.gov/firearms/handgun/p239-blued-1
Sig Sauer	P239 (Blue) / Stainless Steel, Alloy	not available	YES	https://oaq.ca.gov/firearms/handgun/p239-blued-0
Sig Sauer	P239 SAS (2 Tone) 239-40-SAS / Stainless Steel, Polymer	239-40-SAS	YES	https://oaq.ca.gov/firearms/handgun/p239-sas-2-tone-239-40-sas
Sig Sauer	P6 (P.W. Arms) / Alloy; Steel	not available	YES	https://oaq.ca.gov/firearms/handgun/p6-pw-arms
Sig Sauer	M&P 22 10 Round Threaded Barrel	122000	NO	https://www.smith-wesson.com/firearms/mp-22-10-round-threaded-barrel
Sig Sauer	SP2022 (Blue) / Stainless Steel, Polymer	not available	YES	https://oaq.ca.gov/firearms/handgun/sp2022-blued-0
Sig Sauer	SP2022 (Blue) / Stainless Steel, Polymer	not available	YES	https://oaq.ca.gov/firearms/handgun/sp2022-blued-1
Smith & Wesson	M&P® M2.0™ 4" Compact Optics Ready Thumb Safety	13144	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact-optics-ready-thumb-safety
Smith & Wesson	M&P® M2.0™ 4" Compact Optics Ready	13143	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact-optics-ready
Smith & Wesson	Performance Center® M&P® SHIELD™ EZ® Gold Ported Barrel No Thumb Safety	13228	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-shield-ez-gold-ported-barrel-no-thumb-safety
Smith & Wesson	Performance Center® M&P® SHIELD™ EZ® Gold Ported Barrel Manual Thumb Safety	13227	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-shield-ez-gold-ported-barrel-manual-thumb-safety
Smith & Wesson	Performance Center® M&P® SHIELD™ EZ® Silver Ported Barrel No Thumb Safety	13226	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-shield-ez-silver-ported-barrel-no-thumb-safety
Smith & Wesson	Performance Center® M&P® SHIELD™ EZ® Silver Ported Barrel Manual Thumb Safety	13225	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-shield-ez-silver-ported-barrel-manual-thumb-safety
Smith & Wesson	Performance Center® M&P® SHIELD™ EZ® Black Ported Barrel No Thumb Safety	13224	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-shield-ez-black-ported-barrel-no-thumb-safety
Smith & Wesson	Performance Center® M&P® SHIELD™ EZ® Black Ported Barrel Manual Thumb Safety	13223	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-shield-ez-black-ported-barrel-manual-thumb-safety

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Smith & Wesson	Performance Center® M&P® M2.0™ Crimson Trace® Red Dot Optic	12470	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-m20-crimson-trace-red-dot-optic
Smith & Wesson	M&P® M2.0™ Spec Series Pistol Kit	13113	NO	https://www.smith-wesson.com/firearms/mp-9-m20-spec-series-pistol-kit
Smith & Wesson	M&P® SHIELD™ Don't Tread On Me Limited Edition	13292	NO	https://www.smith-wesson.com/firearms/mp-9-shield-dont-tread-me-limited-edition
Smith & Wesson	M&P® SHIELD™ We The People Limited Edition	13303	NO	https://www.smith-wesson.com/firearms/mp-9-shield-we-people-limited-edition
Smith & Wesson	M&P® SHIELD™ EZ® TRUGLO® TRITIUM PRO Night Sights No Thumb Safety	13002	NO	https://www.smith-wesson.com/firearms/mp-9-shield-ez-truglo-tritium-pro-night-sights-no-thumb-safety
Smith & Wesson	M&P® SHIELD™ EZ® TRUGLO® TRITIUM PRO Night Sights Manual Thumb Safety	13001	NO	https://www.smith-wesson.com/firearms/mp-9-shield-ez-truglo-tritium-pro-night-sights-manual-thumb-safety
Smith & Wesson	M&P® M2.0™ SUBCOMPACT Manual Thumb safety MA Compliant	13010	NO	https://www.smith-wesson.com/firearms/mp-9-m20-subcompact-manual-thumb-safety-ma-compliant
Smith & Wesson	Performance Center® M&P® M2.0™ C.O.R.E.™ Pro Series® 5" Barrel	11829	NO	https://www.smith-wesson.com/firearms/performance-center-mp-40-m20-core-pro-series-5-barrel
Smith & Wesson	Performance Center® M&P® M2.0™ C.O.R.E.™ Pro Series® 5" Barrel	11828	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-m20-core-pro-series-5-barrel
Smith & Wesson	Performance Center® M&P® M2.0™ C.O.R.E.™ Pro Series® 4.25" Barrel	11827	NO	https://www.smith-wesson.com/firearms/performance-center-mp-40-m20-core-pro-series-425-barrel
Smith & Wesson	Performance Center® M&P® M2.0™ C.O.R.E.™ Pro Series® 4.25" Barrel	11826	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-m20-core-pro-series-425-barrel
Smith & Wesson	Performance Center® M&P® M2.0™ Ported 5" Barrel & Slide C.O.R.E.™	11834	NO	https://www.smith-wesson.com/firearms/performance-center-mp-40-m20-ported-5-barrel-slide-core
Smith & Wesson	Performance Center® M&P® M2.0™ Ported 5" Barrel & Slide C.O.R.E.™	11833	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-m20-ported-5-barrel-slide-core
Smith & Wesson	Performance Center® M&P® M2.0™ Ported 4.25" Barrel & Slide C.O.R.E.™	11832	NO	https://www.smith-wesson.com/firearms/performance-center-mp-40-m20-ported-425-barrel-slide-core
Smith & Wesson	Performance Center® M&P® M2.0™ Ported 4.25" Barrel & Slide C.O.R.E.™	11831	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-m20-ported-425-barrel-slide-core
Smith & Wesson	M&P® SHIELD™ EZ® No Thumb Safety Crimson Trace® Red LaserGuard®	12439	NO	https://www.smith-wesson.com/firearms/mp-9-shield-ez-no-thumb-safety-crimson-trace-red-laserguard
Smith & Wesson	M&P® SHIELD™ EZ® Manual Thumb Safety Crimson Trace® Red LaserGuard®	12438	NO	https://www.smith-wesson.com/firearms/mp-9-shield-ez-manual-thumb-safety-crimson-trace-red-laserguard
Smith & Wesson	M&P® SHIELD™ EZ® No Thumb Safety	12437	NO	https://www.smith-wesson.com/firearms/mp-9-shield-ez-no-thumb-safety
Smith & Wesson	M&P® SHIELD™ EZ® Manual Thumb Safety®	12436	NO	https://www.smith-wesson.com/firearms/mp-9-shield-ez-manual-thumb-safety
Smith & Wesson	M&P® SHIELD™ Everyday Carry Kit CA Compliant	12550	YES	https://www.smith-wesson.com/firearms/mp-9-shield-everyday-carry-kit-ca-compliant
Smith & Wesson	M&P® M2.0™ Compact Threaded Barrel 10 Round	13112	NO	https://www.smith-wesson.com/firearms/mp-9-m20-compact-threaded-barrel-10-round
Smith & Wesson	M&P® M2.0™ Compact Threaded Barrel 15 Round	13111	NO	https://www.smith-wesson.com/firearms/mp-9-m20-compact-threaded-barrel-15-round

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Smith & Wesson	Performance Center® Ported M&P®9 SHIELD™ M2.0™ Every Day Carry Kit	12471	NO	https://www.smith-wesson.com/firearms/performance-center-ported-mp-9-shield-m20-every-day-carry-kit
Smith & Wesson	M&P® 380 SHIELD™ EZ® Manual Thumb Safety, Range Kit	13114	NO	https://www.smith-wesson.com/firearms/mp-380-shield-ez-manual-thumb-safety-range-kit
Smith & Wesson	S&W SD9 VE™ Crimson Trace Tactical Light 16 Round Promo Kit	13050	NO	https://www.smith-wesson.com/firearms/sw-sd9-ve-crimson-trace-tactical-light-16-round-promo-kit
Smith & Wesson	S&W SD8 VE™ Crimson Trace Tactical Light 10 Round Promo Kit	13046	NO	https://www.smith-wesson.com/firearms/sw-sd8-ve-crimson-trace-tactical-light-10-round-promo-kit
Smith & Wesson	S&W SD40 VE™ Crimson Trace Tactical Light 14 Round Promo Kit	13051	NO	https://www.smith-wesson.com/firearms/sw-sd40-ve-crimson-trace-tactical-light-14-round-promo-kit
Smith & Wesson	S&W SD40 VE™ Crimson Trace Tactical Light 10 Round Promo Kit	13047	NO	https://www.smith-wesson.com/firearms/sw-sd40-ve-crimson-trace-tactical-light-10-round-promo-kit
Smith & Wesson	S&W SD40™ Crimson Trace® Laserguard®	12401	NO	https://www.smith-wesson.com/firearms/sw-sd40-crimson-trace-laserguard
Smith & Wesson	S&W SD9™ Crimson Trace® Laserguard®	12400	NO	https://www.smith-wesson.com/firearms/sw-sd9-crimson-trace-laserguard
Smith & Wesson	M&P®9 M2.0™ 3.6" Compact MA Compliant	13008	NO	https://www.smith-wesson.com/firearms/mp-9-m20-36-compact-ma-compliant
Smith & Wesson	M&P®45 M2.0™ MA Compliant No Thumb Safety	13007	NO	https://www.smith-wesson.com/firearms/mp-45-m20-ma-compliant-no-thumb-safety
Smith & Wesson	M&P®9 M2.0™ SUBCOMPACT No Thumb safety	12481	NO	https://www.smith-wesson.com/firearms/mp-9-m20-subcompact-no-thumb-safety
Smith & Wesson	M&P®9 M2.0™ SUBCOMPACT Manual Thumb safety	12482	NO	https://www.smith-wesson.com/firearms/mp-9-m20-subcompact-manual-thumb-safety
Smith & Wesson	M&P®40 M2.0™ SUBCOMPACT No Thumb safety	12483	NO	https://www.smith-wesson.com/firearms/mp-40-m20-subcompact-no-thumb-safety
Smith & Wesson	M&P®40 M2.0™ SUBCOMPACT Manual Thumb safety	12484	NO	https://www.smith-wesson.com/firearms/mp-40-m20-subcompact-manual-thumb-safety
Smith & Wesson	M&P®45 M2.0™ SUBCOMPACT No Thumb safety	12104	NO	https://www.smith-wesson.com/firearms/mp-45-m20-subcompact-no-thumb-safety
Smith & Wesson	M&P®45 M2.0™ SUBCOMPACT Manual Thumb safety	12103	NO	https://www.smith-wesson.com/firearms/mp-45-m20-subcompact-manual-thumb-safety
Smith & Wesson	Performance Center® M&P®40 M2.0™ 5" Ported Barrel and Slide	11825	NO	https://www.smith-wesson.com/firearms/performance-center-mp-40-m20-5-ported-barrel-and-slide
Smith & Wesson	Performance Center® M&P®9 M2.0™ 5" Ported Barrel and Slide	11824	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-m20-5-ported-barrel-and-slide
Smith & Wesson	Performance Center® M&P®40 M2.0™ 4.25" Ported Barrel and Slide	11823	NO	https://www.smith-wesson.com/firearms/performance-center-mp-40-m20-425-ported-barrel-and-slide
Smith & Wesson	Performance Center® M&P®9 M2.0™ 4.25" Ported Barrel and Slide	11822	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-m20-425-ported-barrel-and-slide
Smith & Wesson	M&P®9 M2.0™ 4" Compact Flat Dark Earth Thumb Safety	12459	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact-flat-dark-earth-thumb-safety
Smith & Wesson	M&P®9 M2.0™ 4" Compact Flat Dark Earth Thumb Safety	12458	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact-flat-dark-earth

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Smith & Wesson	Performance Center® M&P®380 SHIELD™ EZ® M2.0™ Gold Ported Barrel	12719	NO	https://www.smith-wesson.com/firearms/performance-center-mp-380-shield-ez-m20-gold-ported-barrel
Smith & Wesson	Performance Center® M&P®380 SHIELD™ EZ® M2.0™ Silver Ported Barrel	12718	NO	https://www.smith-wesson.com/firearms/performance-center-mp-380-shield-ez-m20-silver-ported-barrel
Smith & Wesson	Performance Center® M&P®380 SHIELD™ EZ® M2.0™ Black Ported Barrel	12717	NO	https://www.smith-wesson.com/firearms/performance-center-mp-380-shield-ez-m20-black-ported-barrel
Smith & Wesson	Performance Center® M&P®9 SHIELD™ M2.0™ 4" Barrel	11787	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-shield-m20-4-barrel
Smith & Wesson	Performance Center® M&P®9 SHIELD™ M2.0™ 4" Barrel Optics Ready	11786	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-shield-m20-4-barrel-optics-ready
Smith & Wesson	Performance Center® M&P®9 SHIELD™ M2.0™ 4" Ported Barrel & Slide	11788	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-shield-m20-4-barrel-slide
Smith & Wesson	Performance Center® M&P®40 SHIELD™ M2.0™ 4" Barrel	11796	NO	https://www.smith-wesson.com/firearms/performance-center-mp-40-shield-m20-4-barrel
Smith & Wesson	Performance Center® M&P®40 SHIELD™ M2.0™ 4" Barrel Optics Ready	11797	NO	https://www.smith-wesson.com/firearms/performance-center-mp-40-shield-m20-4-barrel-optics-ready
Smith & Wesson	Performance Center® M&P®40 SHIELD™ M2.0™ 4" Ported Barrel & Slide	11798	NO	https://www.smith-wesson.com/firearms/performance-center-mp-40-shield-m20-4-barrel-slide
Smith & Wesson	Performance Center® M&P®45 SHIELD™ M2.0™ 4" Barrel	11864	NO	https://www.smith-wesson.com/firearms/performance-center-mp-45-shield-m20-4-barrel
Smith & Wesson	Performance Center® M&P®45 SHIELD™ M2.0™ 4" Barrel Optics Ready	11865	NO	https://www.smith-wesson.com/firearms/performance-center-mp-45-shield-m20-4-barrel-optics-ready
Smith & Wesson	Performance Center® M&P®45 SHIELD™ M2.0™ 4" Ported Barrel & Slide	11866	NO	https://www.smith-wesson.com/firearms/performance-center-mp-45-shield-m20-4-barrel-slide
Smith & Wesson	Performance Center® M&P®40 M2.0™ 5" Barrel Pro Series®	11821	NO	https://www.smith-wesson.com/firearms/performance-center-mp-40-m20-5-barrel-pro-series
Smith & Wesson	Performance Center® M&P®40 SHIELD™ M2.0™ 4" Ported Barrel & Slide	11798	NO	https://www.smith-wesson.com/firearms/performance-center-mp-40-shield-m20-4-barrel-slide
Smith & Wesson	Performance Center® M&P®45 SHIELD™ M2.0™ 4" Barrel	11864	NO	https://www.smith-wesson.com/firearms/performance-center-mp-45-shield-m20-4-barrel
Smith & Wesson	Performance Center® M&P®45 SHIELD™ M2.0™ 4" Barrel Optics Ready	11865	NO	https://www.smith-wesson.com/firearms/performance-center-mp-45-shield-m20-4-barrel-optics-ready
Smith & Wesson	Performance Center® M&P®45 SHIELD™ M2.0™ 4" Ported Barrel & Slide	11866	NO	https://www.smith-wesson.com/firearms/performance-center-mp-45-shield-m20-4-barrel-slide
Smith & Wesson	Performance Center® M&P®40 M2.0™ 5" Barrel Pro Series®	11821	NO	https://www.smith-wesson.com/firearms/performance-center-mp-40-m20-5-barrel-pro-series
Smith & Wesson	Performance Center® M&P®9 SHIELD™ M2.0™ 4.25" Barrel Pro Series®	11819	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-m20-5-barrel-pro-series
Smith & Wesson	Performance Center® M&P®9 SHIELD™ M2.0™ 4.25" Barrel Pro Series®	11818	NO	https://www.smith-wesson.com/firearms/performance-center-mp-9-m20-4-25-barrel-pro-series
Smith & Wesson	M&P®9 M2.0™ 3.6" Compact	11688	NO	https://www.smith-wesson.com/firearms/mp-9-m20-36-compact

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, examp)?	LINK TO PRODUCT
Smith & Wesson	M&P@9 M2.0™ 3.6" Compact Manual Thumb Safety	11694	NO	https://www.smith-wesson.com/firearms/mp-9-m20-36-compact-manual-thumb-safety
Smith & Wesson	M&P@40 M2.0™ 3.6" Compact	11691	NO	https://www.smith-wesson.com/firearms/mp-40-m20-36-compact
Smith & Wesson	M&P@40 M2.0™ 3.6" Compact Manual Thumb Safety	11695	NO	https://www.smith-wesson.com/firearms/mp-40-m20-36-compact-manual-thumb-safety
Smith & Wesson	Performance Center@ Ported M&P@45 SHIELD™ M2.0™ Tritium Night Sights	12474	NO	https://www.smith-wesson.com/firearms/performance-center-ported-mp-45-shield-m20-tritium-night-sights
Smith & Wesson	Performance Center@ Ported M&P@45 SHIELD™ M2.0™ Hi Viz@ Sights	12473	NO	https://www.smith-wesson.com/firearms/performance-center-ported-mp-45-shield-m20-hi-viz-sights
Smith & Wesson	Performance Center@ Ported M&P@40 SHIELD™ M2.0™ Tritium Night Sights	11870	NO	https://www.smith-wesson.com/firearms/performance-center-ported-mp-40-shield-m20-tritium-night-sights
Smith & Wesson	Performance Center@ Ported M&P@40 SHIELD™ M2.0™ Hi Viz@ Sights	11868	NO	https://www.smith-wesson.com/firearms/performance-center-ported-mp-40-shield-m20-hi-viz-sights
Smith & Wesson	Performance Center@ Ported M&P@9 SHIELD™ M2.0™ Tritium Night Sights	11869	NO	https://www.smith-wesson.com/firearms/performance-center-ported-mp-9-shield-m20-tritium-night-sights
Smith & Wesson	Performance Center@ Ported M&P@9 SHIELD™ M2.0™ Hi Viz@ Sights	11867	NO	https://www.smith-wesson.com/firearms/performance-center-ported-mp-9-shield-m20-hi-viz-sights
Smith & Wesson	M&P@380 SHIELD™ EZ@ with Crimson Trace@ Green LaserGuard@ Manual Thumb Safety	12610	NO	https://www.smith-wesson.com/firearms/mp-380-shield-ez-crimson-trace-green-laser-guard-manual-thumb-safety
Smith & Wesson	M&P@380 SHIELD™ EZ@ with Crimson Trace@ Green LaserGuard	12611	NO	https://www.smith-wesson.com/firearms/mp-380-shield-ez-crimson-trace-green-laser-guard
Smith & Wesson	M&P@9 M2.0™ 4" Compact	11683	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact
Smith & Wesson	M&P@9 M2.0™ 4" Compact Thumb Safety	11686	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact-thumb-safety
Smith & Wesson	M&P@9 M2.0™ 4" Compact 10 Rounds	12464	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact-10-rounds
Smith & Wesson	M&P@9 M2.0™ 4" Compact Thumb Safety	12465	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact-thumb-safety
Smith & Wesson	M&P@9 M2.0™ 4" Compact w/Crimson Trace@ Rail Master@ Universal Tactical Light	12411	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact-wcrimson-trace-rail-master-universal-tactical-light
Smith & Wesson	M&P@9 M2.0™ 4" Compact w/Crimson Trace@ Rail Master@ Universal Tactical Light Thumb Safety	12412	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact-wcrimson-trace-rail-master-universal-tactical-light-thumb-safety
Smith & Wesson	M&P@9 M2.0™ 4" Compact Crimson Trace@ Green LaserGuard	12413	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact-crimson-trace-green-laser-guard
Smith & Wesson	M&P@9 M2.0™ 4" Compact MA Compliant	12466	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact-ma-compliant-0
Smith & Wesson	M&P@9 M2.0™ 4" Compact Thumb Safety MA Compliant	12467	NO	https://www.smith-wesson.com/firearms/mp-9-m20-4-compact-thumb-safety-ma-compliant
Smith & Wesson	M&P@40 M2.0™ 4" Compact	11684	NO	https://www.smith-wesson.com/firearms/mp-40-m20-4-compact
Smith & Wesson	M&P@40 M2.0™ 4" Compact Thumb Safety	11687	NO	https://www.smith-wesson.com/firearms/mp-40-m20-4-compact-thumb-safety

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Smith & Wesson	M&P@40 M2.0™ 4" Compact Crimson Trace® Green Laser Guard	12415	NO	https://www.smith-wesson.com/firearms/mp-40-m20-4-compact-crimson-trace-green-laser-guard
Smith & Wesson	M&P@40 M2.0™ 4" Compact Crimson Trace® Green Laser Guard Thumb Safety	12416	NO	https://www.smith-wesson.com/firearms/mp-40-m20-4-compact-crimson-trace-green-laser-guard-thumb-safety
Smith & Wesson	M&P@45 M2.0™ 4" Compact	12106	NO	https://www.smith-wesson.com/firearms/mp-45-m20-4-compact
Smith & Wesson	M&P@45 M2.0™ 4" Compact Thumb Safety	12105	NO	https://www.smith-wesson.com/firearms/mp-45-m20-4-compact-thumb-safety
Smith & Wesson	M&P@9 SHIELD M2.0™ Integrated Crimson Trace® Green Laser MA Compliant	12469	NO	https://www.smith-wesson.com/firearms/mp-9-shield-m20-integrated-crimson-trace-green-laser-ma-compliant
Smith & Wesson	M&P@9 SHIELD M2.0™ Integrated Crimson Trace® Red Laser MA Compliant	12468	NO	https://www.smith-wesson.com/firearms/mp-9-shield-m20-integrated-crimson-trace-red-laser-ma-compliant
Smith & Wesson	M&P@45 SHIELD M2.0™ Integrated Crimson Trace® Red Laser Manual Thumb Safety	12087	NO	https://www.smith-wesson.com/firearms/mp-45-shield-m20-integrated-crimson-trace-red-laser-manual-thumb-safety
Smith & Wesson	M&P@45 M2.0™ TRUGLO® TFX™ Sights	11769	NO	https://www.smith-wesson.com/firearms/mp-45-m20-truglo-tfx-sights
Smith & Wesson	Performance Center® SW22 VICTORY® Target Model 6" Carbon Fiber Target Barrel Red Dot Sight	12081	NO	https://www.smith-wesson.com/firearms/performance-center-sw22-victory-target-model-6-carbon-fiber-target-barrel-red-dot-sight
Smith & Wesson	Performance Center® SW22 VICTORY® Target Model 6" Carbon Fiber Target Barrel	12080	NO	https://www.smith-wesson.com/firearms/performance-center-sw22-victory-target-model-6-carbon-fiber-target-barrel-00
Smith & Wesson	Performance Center® SW22 VICTORY® Target Model 6" Fluted Barrel Red Dot Sight	12079	NO	https://www.smith-wesson.com/firearms/performance-center-sw22-victory-target-model-6-fluted-barrel-red-dot-sight
Smith & Wesson	Performance Center® SW22 VICTORY® Target Model Fiber Optic Sights	12078	NO	https://www.smith-wesson.com/firearms/performance-center-sw22-victory-target-model-fiber-optic-sights
Smith & Wesson	SW22 VICTORY® Target Model	11536	NO	https://www.smith-wesson.com/firearms/sw22-victory-target-model
Smith & Wesson	M&P@380 SHIELD™ EZ®	180023	NO	https://www.smith-wesson.com/firearms/mp-380-shield-ez-0
Smith & Wesson	M&P@380 SHIELD™ EZ® Manual Thumb Safety	11663	NO	https://www.smith-wesson.com/firearms/mp-380-shield-ez-manual-thumb-safety
Smith & Wesson	M&P@9 M2.0™ with Threaded Barrel	11770	NO	https://www.smith-wesson.com/firearms/mp-9-m20-threaded-barrel
Smith & Wesson	M&P@45 M2.0™ with Threaded Barrel	11771	NO	https://www.smith-wesson.com/firearms/mp-45-m20-threaded-barrel
Smith & Wesson	M&P@ BODYGUARD® 380 Crimson Trace® Green Laser Guard® No Thumb Safety	11589	NO	https://www.smith-wesson.com/node/14132
Smith & Wesson	S&W SD9™ HI VIZ® Sights	11587	NO	https://www.smith-wesson.com/node/14130
Smith & Wesson	M&P@9 M2.0™ No Thumb Safety Flat Dark Earth	11989	NO	https://www.smith-wesson.com/firearms/mp-9-m20-no-thumb-safety-flat-dark-earth
Smith & Wesson	M&P@40 M2.0™ No Thumb Safety Flat Dark Earth	11990	NO	https://www.smith-wesson.com/firearms/mp-40-m20-no-thumb-safety-flat-dark-earth
Smith & Wesson	M&P@9 SHIELD M2.0™ Integrated Crimson Trace® Green Laser NTS	11903	NO	https://www.smith-wesson.com/firearms/mp-9-shield-m20-integrated-crimson-trace-green-laser-nts

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Smith & Wesson	M&P@9 SHIELD M2.0™ Integrated Crimson Trace® Green Laser Thumb Safety	11901	NO	https://www.smith-wesson.com/firearms/mp-9-shield-m20-integrated-crimson-trace-green-laser-thumb-safety
Smith & Wesson	M&P@9 SHIELD M2.0™ LaserGuard® Pro™ Green Laser/Light Combo	11811	NO	https://www.smith-wesson.com/firearms/mp-9-shield-m20-laserguard-pro-green-laserlight-combo
Smith & Wesson	M&P@40 SHIELD M2.0™ LaserGuard® Pro™ Green Laser/Light Combo	11817	NO	https://www.smith-wesson.com/firearms/mp-40-shield-m20-laserguard-pro-green-laserlight-combo
Smith & Wesson	M&P@9 SHIELD M2.0™ Manual Thumb Safety MA Compliant	11807	NO	https://www.smith-wesson.com/firearms/mp-9-shield-m20-manual-thumb-safety-ma-compliant
Smith & Wesson	M&P@9 SHIELD M2.0™ MA Compliant	11809	NO	https://www.smith-wesson.com/firearms/mp-9-shield-m20-ma-compliant
Smith & Wesson	M&P@40 SHIELD M2.0™ Manual Thumb Safety MA Compliant	11813	NO	https://www.smith-wesson.com/firearms/mp-40-shield-m20-manual-thumb-safety-ma-compliant
Smith & Wesson	M&P@40 SHIELD M2.0™ MA Compliant	11815	NO	https://www.smith-wesson.com/firearms/mp-40-shield-m20-ma-compliant
Smith & Wesson	M&P@ BODY GUARD® 380 Engraved RSR Exclusive	11914	NO	https://www.smith-wesson.com/firearms/mp-bodyguard-380-engraved-rsr-exclusive
Smith & Wesson	M&P@9 M2.0™ TRUGLO® TFX™ Sights	11767	NO	https://www.smith-wesson.com/firearms/mp-9-m20-truglo-tfx-sights
Smith & Wesson	M&P@40 M2.0™ TRUGLO® TFX™ Sights	11768	NO	https://www.smith-wesson.com/firearms/mp-40-m20-truglo-tfx-sights
Smith & Wesson	PERFORMANCE CENTER® SW1911 PRO SERIES® 9mm	178053	NO	https://www.smith-wesson.com/firearms/performance-center-sw1911-pro-series-9mm
Smith & Wesson	M&P@9 SHIELD™ Flat Dark Earth Finish No Thumb Safety	10179	NO	https://www.smith-wesson.com/firearms/mp-9-shield-flat-dark-earth-finish-no-thumb-safety-0
Smith & Wesson	M&P@9 SHIELD M2.0™ Integrated Crimson Trace® Red Laser	11671	NO	https://www.smith-wesson.com/firearms/mp-9-shield-m20-integrated-crimson-trace-red-laser
Smith & Wesson	M&P@40 SHIELD M2.0™ Integrated Crimson Trace® Red Laser	11672	NO	https://www.smith-wesson.com/firearms/mp-40-shield-m20-integrated-crimson-trace-red-laser
Smith & Wesson	M&P@9 SHIELD M2.0™ Manual Thumb Safety	11806	NO	https://www.smith-wesson.com/firearms/mp-9-shield-m20-manual-thumb-safety
Smith & Wesson	M&P@9 SHIELD M2.0™	11808	NO	https://www.smith-wesson.com/firearms/mp-9-shield-m20-0
Smith & Wesson	M&P@40 SHIELD M2.0™ Manual Thumb Safety	11812	NO	https://www.smith-wesson.com/firearms/mp-40-shield-m20-manual-thumb-safety
Smith & Wesson	M&P@40 SHIELD M2.0™ No Thumb Safety	11814	NO	https://www.smith-wesson.com/firearms/mp-40-shield-m20-no-thumb-safety
Smith & Wesson	M&P@9 SHIELD M2.0™ Tritium Night Sights	11810	NO	https://www.smith-wesson.com/firearms/mp-9-shield-m20-tritium-night-sights
Smith & Wesson	M&P@40 M2.0™ MA Compliant	11816	NO	https://www.smith-wesson.com/firearms/mp-40-m20-ma-compliant
Smith & Wesson	M&P@40 M2.0™ MA Compliant	11764	NO	https://www.smith-wesson.com/firearms/mp-40-m20-ma-compliant
Smith & Wesson	M&P@9 M2.0™ MA Compliant	11763	NO	https://www.smith-wesson.com/firearms/mp-9-m20-ma-compliant

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Smith & Wesson	Performance Center@M&P@45 M2.0™ Ported CORE	11710	NO	https://www.smith-wesson.com/firearms/performance-center-mp-45-m20-ported-core
Smith & Wesson	M&P@22 Compact Tungsten Gray Cerakote@Frame	12000	NO	https://www.smith-wesson.com/firearms/mp-22-compact-tungsten-gray-cerakote-frame
Smith & Wesson	S&W SD40™ Flat Dark Earth Frame Finish	11999	NO	https://www.smith-wesson.com/firearms/sw-sd40-flat-dark-earth-frame-finish
Smith & Wesson	S&W SD9™ Flat Dark Earth Frame Finish	11998	NO	https://www.smith-wesson.com/firearms/sw-sd9-flat-dark-earth-frame-finish
Smith & Wesson	S&W SD40™ Gray Frame Finish	11996	NO	https://www.smith-wesson.com/firearms/sw-sd40-gray-frame-finish
Smith & Wesson	S&W SD9™ Gray Frame Finish	11995	NO	https://www.smith-wesson.com/firearms/sw-sd9-gray-frame-finish
Smith & Wesson	S&W SD40 VE™ HI VIZ@ Sights	11908	YES	https://www.smith-wesson.com/firearms/sw-sd40-ve-hi-viz-sights
Smith & Wesson	S&W SD9 VE™ HI VIZ@ Sights	11907	YES	https://www.smith-wesson.com/firearms/sw-sd9-ve-hi-viz-sights
Smith & Wesson	M&P@9 M2.0™ 15 Rds	11758	NO	https://www.smith-wesson.com/firearms/mp-9-m20-15-rds
Smith & Wesson	M&P@9 M2.0™ 10 Rds	11761	NO	https://www.smith-wesson.com/firearms/mp-9-m20-10-rds
Smith & Wesson	M&P@40 M2.0™ 10 Rds	11762	NO	https://www.smith-wesson.com/firearms/mp-40-m20-10-rds
Smith & Wesson	M&P@45 M2.0™ Thumb Safety	11526	NO	https://www.smith-wesson.com/firearms/mp-45-m20-thumb-safety
Smith & Wesson	M&P@45 M2.0™ Thumb Safety	11726	NO	https://www.smith-wesson.com/firearms/mp-45-m20-thumb-safety
Smith & Wesson	M&P@45 M2.0™	11523	NO	https://www.smith-wesson.com/firearms/mp-45-m20
Smith & Wesson	M&P@45 SHIELD M2.0™ Tritium Night Sights No Thumb Safety	11726	NO	https://www.smith-wesson.com/firearms/mp-45-shield-m20-tritium-night-sights-no-thumb-safety
Smith & Wesson	M&P@45 SHIELD M2.0™ No Thumb Safety MA Compliant	11705	NO	https://www.smith-wesson.com/firearms/mp-45-shield-m20-no-thumb-safety-ma-compliant
Smith & Wesson	M&P@45 SHIELD M2.0™ Thumb Safety MA Compliant	11704	NO	https://www.smith-wesson.com/firearms/mp-45-shield-m20-thumb-safety-ma-compliant
Smith & Wesson	M&P@22 COMPACT CERAKOTE@ Flat Dark Earth Threaded Barrel	10242	NO	https://www.smith-wesson.com/firearms/mp-22-compact-cerakote-flat-dark-earth-threaded-barrel
Smith & Wesson	M&P@9 M2.0™	11521	NO	https://www.smith-wesson.com/firearms/mp-9-m20-1
Smith & Wesson	M&P@40 M2.0™	11522	NO	https://www.smith-wesson.com/firearms/mp-40-m20
Smith & Wesson	M&P@9 M2.0™	11524	NO	https://www.smith-wesson.com/firearms/mp-9-m20-0
Smith & Wesson	M&P@40 M2.0™	11525	NO	https://www.smith-wesson.com/firearms/mp-40-m20-0

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Smith & Wesson	M&P@9 M2.0™	11537	NO	https://www.smith-wesson.com/firearms/mp-9-m20
Smith & Wesson	M&P@40 M2.0™	11595	NO	https://www.smith-wesson.com/firearms/mp-40-m20
Smith & Wesson	M&P@45 SHIELD M2.0™ No Thumb Safety	11531	NO	https://www.smith-wesson.com/firearms/mp-45-shield-m20-no-thumb-safety
Smith & Wesson	M&P@45 SHIELD M2.0™ Thumb Safety	180022	NO	https://www.smith-wesson.com/firearms/mp-45-shield-m20-thumb-safety
Smith & Wesson	SW22 VICTORY	108490	NO	https://www.smith-wesson.com/firearms/sw22-victory
Smith & Wesson	SW22 Victory® Threaded Barrel	10201	NO	https://www.smith-wesson.com/firearms/sw22-victory-threaded-barrel
Smith & Wesson	SW22 VICTORY® Kryptek™	10297	NO	https://www.smith-wesson.com/firearms/sw22-victory-kryptek
Smith & Wesson	M&P@40 Compact	10199	NO	https://www.smith-wesson.com/firearms/mp-40-compact
Smith & Wesson	M&P@22 10 Round Threaded Barrel	122000	NO	https://www.smith-wesson.com/firearms/mp-22-10-round-threaded-barrel
Smith & Wesson	M&P@22 12 Round Threaded Barrel	222000	NO	https://www.smith-wesson.com/firearms/mp-22-12-round-threaded-barrel
Smith & Wesson	M&P@9c - Compact Size, Magazine Safety	209004	NO	https://www.smith-wesson.com/firearms/mp-9c-compact-size-magazine-safety
Smith & Wesson	M&P@40 Compact	109003	NO	https://www.smith-wesson.com/firearms/mp-40-compact
Smith & Wesson	M&P@22 Compact	108390	NO	https://www.smith-wesson.com/firearms/mp-22-compact
Smith & Wesson	M&P@40 SHIELD™ CA Compliant	187020	yea	https://www.smith-wesson.com/firearms/mp-40-shield-ca-compliant
Smith & Wesson	M&P@40 SHIELD™ MA Compliant	180050	NO	https://www.smith-wesson.com/firearms/mp-40-shield-ma-compliant
Smith & Wesson	M&P@9 SHIELD™	180021	NO	https://www.smith-wesson.com/firearms/mp-9-shield-0
Smith & Wesson	M&P@9 SHIELD™ CA Compliant	187021	YES	https://www.smith-wesson.com/firearms/mp-9-shield-ca-compliant
Smith & Wesson	M&P@9 SHIELD™ MA Compliant	180051	NO	https://www.smith-wesson.com/firearms/mp-9-shield-ma-compliant
Smith & Wesson	M&P@9 SHIELD™ No Thumb Safety	10035	NO	https://www.smith-wesson.com/firearms/mp-9-shield-no-thumb-safety
Smith & Wesson	M&P@9 SHIELD™ No Thumb Safety MA Compliant	10038	NO	https://www.smith-wesson.com/firearms/mp-9-shield-no-thumb-safety-ma-compliant
Smith & Wesson	M&P@ BODY GUARD® 380	109381	NO	https://www.smith-wesson.com/firearms/mp-bodyguard-380
Smith & Wesson	M&P@ BODY GUARD® 380 Crimson Trace®	10048	NO	https://www.smith-wesson.com/firearms/mp-bodyguard-380-crimson-trace

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Smith & Wesson	M&P@40 SHIELD™	180020	NO	https://www.smith-wesson.com/firearms/mp-40-shield
Smith & Wesson	PERFORMANCE CENTER® SW1911 PRO SERIES®	178047	NO	https://www.smith-wesson.com/firearms/performance-center-sw1911-pro-series-1
Smith & Wesson	Engraved 1911	10270	NO	https://www.smith-wesson.com/firearms/engraved-1911
Smith & Wesson	M&P® BODYGUARD® 380 Engraved	10110	NO	https://www.smith-wesson.com/firearms/mp-bodyguard-380-engraved
Smith & Wesson	PERFORMANCE CENTER® Model SW1911	170343	NO	https://www.smith-wesson.com/firearms/performance-center-model-sw1911-1
Smith & Wesson	SW1911TA E-Series™ Tactical Accessory Rail	108411	NO	https://www.smith-wesson.com/firearms/sw1911ta-e-series-tactical-accessory-rail
Smith & Wesson	S&W SD9 VE™ Low Capacity	123900	NO	https://www.smith-wesson.com/firearms/sw-sd9-ve-low-capacity
Smith & Wesson	SW1911 E-Series™	108482	NO	https://www.smith-wesson.com/firearms/sw1911e-series
Smith & Wesson	S&W SD8 VE™ MA Compliant	123902	NO	https://www.smith-wesson.com/firearms/sw-sd8-ve-ma-compliant
Smith & Wesson	SW1911SC E-Series™ Round Butt Scandium Frame	108483	NO	https://www.smith-wesson.com/firearms/sw1911sc-e-series-round-butt-scandium-frame
Smith & Wesson	S&W SD9 VE™ CA Compliant	123903	YES	https://www.smith-wesson.com/firearms/sw-sd9-ve-ca-compliant
Smith & Wesson	SW1911SC E-Series™ Round Butt Scandium Frame	108485	NO	https://www.smith-wesson.com/firearms/sw1911sc-e-series-round-butt-scandium-frame-0
Smith & Wesson	S&W SD40 VE™ - Std Capacity	223400	NO	https://www.smith-wesson.com/firearms/sw-sd40-ve-std-capacity
Smith & Wesson	PERFORMANCE CENTER® Model SW1911	170343	NO	https://www.smith-wesson.com/firearms/performance-center-model-sw1911-11
Smith & Wesson	S&W SD9 VE™ Std Capacity	223900	NO	https://www.smith-wesson.com/firearms/sw-sd9-ve-std-capacity
Smith & Wesson	PERFORMANCE CENTER® Model SW1911	178011	NO	https://www.smith-wesson.com/firearms/performance-center-model-sw1911
Smith & Wesson	Model 41	130511	NO	https://www.smith-wesson.com/firearms/model-41
Smith & Wesson	PERFORMANCE CENTER® SW1911 PRO SERIES®	178017	NO	https://www.smith-wesson.com/firearms/performance-center-sw1911-pro-series-0
Smith & Wesson	Model 41	130512	NO	https://www.smith-wesson.com/firearms/model-41-0
Smith & Wesson	PERFORMANCE CENTER® SW1911 PRO SERIES®	178020	NO	https://www.smith-wesson.com/firearms/performance-center-sw1911-pro-series
Smith & Wesson	PERFORMANCE CENTER® Model 41	178031	NO	https://www.smith-wesson.com/firearms/performance-center-model-41
Smith & Wesson	S&W SD40 VE™ Low Capacity	123400	NO	https://www.smith-wesson.com/firearms/sw-sd40-ve-low-capacity

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Smith & Wesson	S&W SD40 VE™ MA Compliant	123402	NO	https://www.smith-wesson.com/firearms/sw-sd40-ve-ma-compliant
Smith & Wesson	SW1911TA E-Series™	108409	NO	https://www.smith-wesson.com/firearms/sw1911ta-e-series
Smith & Wesson	S&W SD9 VE™ CA Compliant	123403	YES	https://www.smith-wesson.com/firearms/sw-sd40-ve-ca-compliant
Smith & Wesson	M&P®9 SHIELD™ HI VIZ® Sights	11905	YES	https://www.smith-wesson.com/firearms/mp-9-shield-hi-viz-sights
Smith & Wesson	M&P®40 SHIELD™ HI VIZ® Sights	11906	YES	https://www.smith-wesson.com/firearms/mp-40-shield-hi-viz-sights
Smith & Wesson	S&W SD9 VE™ HI VIZ® Sights Gray Frame Finish	11993	NO	https://www.smith-wesson.com/firearms/sw-sd9-ve-hi-viz-sights-gray-frame-finish
Smith & Wesson	S&W SD40 VE™ HI VIZ® Sights Gray Frame Finish	11994	NO	https://www.smith-wesson.com/firearms/sw-sd40-ve-hi-viz-sights-gray-frame-finish
Smith & Wesson	Model 442 We The People Limited Edition	13305	NO	https://www.smith-wesson.com/firearms/model442-we-people-limited-edition
Smith & Wesson	Model 648	12460	YES	https://www.smith-wesson.com/firearms/model648
Smith & Wesson	Model 610 10MM Revolver – 4"	12463	YES	https://www.smith-wesson.com/firearms/mo-del610-10mm-revolver-4
Smith & Wesson	Model 610 10MM Revolver – 6.5"	12462	YES	https://www.smith-wesson.com/firearms/mo-del610-10mm-revolver-65
Smith & Wesson	Model 642 Deluxe Silver/Black Croc Textured Wood Lipsey's Exclusive	150957	NO	https://www.smith-wesson.com/firearms/mo-del642-deluxe-silverblack-croc-textured-wood-lipsevs-exclusive
Smith & Wesson	Model 642 Deluxe Rosewood Laminate Textured Wood Lipsey's Exclusive	150551	NO	https://www.smith-wesson.com/firearms/mo-del642-deluxe-rosewood-laminate-textured-wood-lipsevs-exclusive
Smith & Wesson	M&P® BODYGUARD® 38 Integrated Crimson Trace® Laser MA Compliant	12058	NO	https://www.smith-wesson.com/firearms/mp-bodyguard-38-integrated-crimson-trace-laser-ma-compliant
Smith & Wesson	Performance Center® Model 442 Crimson Trace® LG-105 Lasergrips®	12643	YES	https://www.smith-wesson.com/firearms/performance-center-model-442-crimson-trace-lg-105-lasergrips
Smith & Wesson	Model 642 CT Crimson Trace® Lasergrips®	12555	YES	https://www.smith-wesson.com/firearms/mo-del642-ct-crimson-trace-lasergrips-0
Smith & Wesson	M&P® BODYGUARD® 38 Integrated Crimson Trace® Laser	12056	YES	https://www.smith-wesson.com/firearms/mp-bodyguard-38-integrated-crimson-trace-laser
Smith & Wesson	M&P® BODYGUARD® 38 No Laser MA Compliant	12057	NO	https://www.smith-wesson.com/firearms/mp-bodyguard-38-integrated-crimson-trace-laser
Smith & Wesson	Model 19 Classic	12040	YES	https://www.smith-wesson.com/firearms/model19-classic
Smith & Wesson	PERFORMANCE CENTER® Model 19 Carry Comp®	12039	YES	https://www.smith-wesson.com/firearms/performance-center-model-19-carry-comp
Smith & Wesson	M&P® BODYGUARD® 38 No Laser	103039	YES	https://www.smith-wesson.com/firearms/mp-bodyguard-38-no-laser
Smith & Wesson	Model 360 .357 Magnum/38 S&W Special +P	11749	NO	https://www.smith-wesson.com/firearms/mo-del360-357-magnum38-sw-special-p

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Smith & Wesson	Performance Center® Model 686	11759	YES	https://www.smith-wesson.com/firearms/performance-center-model-686-0
Smith & Wesson	Performance Center® Model 686 Plus	11760	YES	https://www.smith-wesson.com/firearms/performance-center-model-686-plus-0
Smith & Wesson	Model 642 LS - LadySmith™	11988	NO	https://www.smith-wesson.com/firearms/model-642-ls-ladysmith-0
Smith & Wesson	Model 437 FDE Combat Grips	11926	YES	https://www.smith-wesson.com/firearms/model-437-fde-combat-grips
Smith & Wesson	PERFORMANCE CENTER® Model 460XVR™ Hi VIZ® Fiber Optic Front Sight	11626	YES	https://www.smith-wesson.com/firearms/performance-center-model-460xvr-hi-viz-fiber-optic-front-sight
Smith & Wesson	Model S&W500™ Hi VIZ® Fiber Optic	11623	YES	https://www.smith-wesson.com/firearms/model-sw500-hi-viz-fiber-optic
Smith & Wesson	PERFORMANCE CENTER® Model 986 2.5" Barrel	10227	YES	https://www.smith-wesson.com/firearms/performance-center-model-986-25-barrel
Smith & Wesson	Model 69 Combat Magnum®	10064	YES	https://www.smith-wesson.com/firearms/model-69-combat-magnum
Smith & Wesson	Model 66 Combat Magnum®	10061	YES	https://www.smith-wesson.com/firearms/model-66-combat-magnum
Smith & Wesson	Model 629 4" Barrel	163603	YES	https://www.smith-wesson.com/firearms/model-629-4-barrel
Smith & Wesson	Model S&W500	163565	YES	https://www.smith-wesson.com/firearms/model-sw500-1
Smith & Wesson	Model GOVERNOR® with Crimson Trace® Laser Grips	162411	NO	https://www.smith-wesson.com/firearms/model-governor-crimson-trace-laser-grips
Smith & Wesson	Model GOVERNOR	162410	NO	https://www.smith-wesson.com/firearms/model-governor-0
Smith & Wesson	Performance Center® Pro Series® Model 642	178042	YES	https://www.smith-wesson.com/firearms/performance-center-pro-series-model-642
Smith & Wesson	PERFORMANCE CENTER® Model 629 Competitor 6" Weighted Barrel	170320	YES	https://www.smith-wesson.com/firearms/performance-center-model-629-competitor-6-weighted-barrel
Smith & Wesson	Performance Center® Pro Series® Model 627	178014	YES	https://www.smith-wesson.com/firearms/performance-center-pro-series-model-627
Smith & Wesson	PERFORMANCE CENTER® Model 629 Stealth Hunter	170323	YES	https://www.smith-wesson.com/firearms/performance-center-model-629-stealth-hunter
Smith & Wesson	Performance Center® Pro Series® Model 686 Plus	178038	YES	https://www.smith-wesson.com/firearms/performance-center-pro-series-model-686-plus
Smith & Wesson	PERFORMANCE CENTER® Model 629	170334	YES	https://www.smith-wesson.com/firearms/performance-center-model-629-1
Smith & Wesson	Performance Center® Pro Series® Model 442 Moon Clip	178041	YES	https://www.smith-wesson.com/firearms/performance-center-pro-series-model-442-moon-clip
Smith & Wesson	PERFORMANCE CENTER® Model 460XVR™ - 14" Barrel with Bi-Pod	170339	YES	https://www.smith-wesson.com/firearms/performance-center-model-460xvr-14-barrel-bi-pod
Smith & Wesson	Performance Center® Pro Series® Model 640	178044	YES	https://www.smith-wesson.com/firearms/performance-center-pro-series-model-640

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Smith & Wesson	PERFORMANCE CENTER® Model 929	170341	YES	https://www.smith-wesson.com/firearms/performance-center-model-929
Smith & Wesson	Performance Center® Pro Series® Model 986	178055	YES	https://www.smith-wesson.com/firearms/performance-center-pro-series-model-986
Smith & Wesson	PERFORMANCE CENTER® Model 686	170346	YES	https://www.smith-wesson.com/firearms/performance-center-model-686
Smith & Wesson	PERFORMANCE CENTER® Model M&P® R8	170292	YES	https://www.smith-wesson.com/firearms/performance-center-model-mp-r8
Smith & Wesson	PERFORMANCE CENTER® Model 627 V-Comp	170296	YES	https://www.smith-wesson.com/firearms/performance-center-model-627-v-comp
Smith & Wesson	PERFORMANCE CENTER® Model 642 Enhanced Action	170348	YES	https://www.smith-wesson.com/firearms/performance-center-model-642-enhanced-action
Smith & Wesson	M&P® BODYGUARD® 38 Crimson Trace®	10062	YES	https://www.smith-wesson.com/firearms/mp-bodyguard-38-crimson-trace
Smith & Wesson	PERFORMANCE CENTER® Model S&W500™	170299	YES	https://www.smith-wesson.com/firearms/performance-center-model-sw500-0
Smith & Wesson	PERFORMANCE CENTER® Model 637 Enhanced Action	170349	YES	https://www.smith-wesson.com/firearms/performance-center-model-637-enhanced-action
Smith & Wesson	Model 317 Kit Gun™	160221	YES	https://www.smith-wesson.com/firearms/model-317-kit-gun
Smith & Wesson	PERFORMANCE CENTER® Model 325 Thunder Ranch	170316	YES	https://www.smith-wesson.com/firearms/performance-center-model-325-thunder-ranch
Smith & Wesson	PERFORMANCE CENTER® Model 460XVR™	170350	YES	https://www.smith-wesson.com/firearms/performance-center-model-460xvr-1
Smith & Wesson	Model GOVERNOR	160410	NO	https://www.smith-wesson.com/firearms/model-governor
Smith & Wesson	PERFORMANCE CENTER® Model 629 .44 Magnum® Hunter	170318	YES	https://www.smith-wesson.com/firearms/performance-center-model-629-44-magnum-hunter
Smith & Wesson	Performance Center® Pro Series® Model 686 SSR	178012	YES	https://www.smith-wesson.com/firearms/performance-center-pro-series-model-686-ssr
Smith & Wesson	PERFORMANCE CENTER® Model 686 Competitor 6" Weighted Barrel	170319	YES	https://www.smith-wesson.com/firearms/performance-center-model-686-competitor-6-weighted-barrel
Smith & Wesson	Performance Center® Pro Series® Model 60	178013	YES	https://www.smith-wesson.com/firearms/performance-center-pro-series-model-60
Smith & Wesson	Model 340 PD	163062	YES	https://www.smith-wesson.com/firearms/model-340-pd
Smith & Wesson	PERFORMANCE CENTER® Model 627	170210	YES	https://www.smith-wesson.com/firearms/performance-center-model-627-1
Smith & Wesson	Model S&W500	163501	YES	https://www.smith-wesson.com/firearms/model-sw500-0
Smith & Wesson	Model 686 Plus	164198	YES	https://www.smith-wesson.com/firearms/model-686-plus-1
Smith & Wesson	Model 360 PD	163064	YES	https://www.smith-wesson.com/firearms/model-360-pd

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Smith & Wesson	PERFORMANCE CENTER® Model S&W500™	170231	YES	https://www.smith-wesson.com/firearms/performance-center-model-sw500
Smith & Wesson	Model S&W500™ 4"	163504	YES	https://www.smith-wesson.com/firearms/mp-del-sw500-4
Smith & Wesson	Model 686	164222	YES	https://www.smith-wesson.com/firearms/mp-del-686
Smith & Wesson	Model 638	163070	YES	https://www.smith-wesson.com/firearms/model-638
Smith & Wesson	PERFORMANCE CENTER® Model 327	170245	YES	https://www.smith-wesson.com/firearms/performance-center-model-327
Smith & Wesson	Model 629	163606	YES	https://www.smith-wesson.com/firearms/mp-del-629
Smith & Wesson	Model 686	164224	YES	https://www.smith-wesson.com/firearms/mp-del-686-0
Smith & Wesson	Model 638 CT Crimson Trace® Lasergrp®	163071	YES	https://www.smith-wesson.com/firearms/mp-del-638-ct-crimson-trace-lasergrp
Smith & Wesson	PERFORMANCE CENTER® Model 460XVR™	170262	YES	https://www.smith-wesson.com/firearms/performance-center-model-460xvr-0
Smith & Wesson	Model 629	163636	YES	https://www.smith-wesson.com/firearms/mp-del-629-0
Smith & Wesson	Model 686 Plus	164300	NO	https://www.smith-wesson.com/firearms/model-686-plus-2
Smith & Wesson	M&P®340	163072	YES	https://www.smith-wesson.com/firearms/mp-340
Smith & Wesson	PERFORMANCE CENTER® Model 327 TRR8	170269	YES	https://www.smith-wesson.com/firearms/performance-center-model-327-trr8
Smith & Wesson	Model 629 Classic	163638	YES	https://www.smith-wesson.com/firearms/model-629-classic
Smith & Wesson	Model 63	162634	YES	https://www.smith-wesson.com/firearms/model-63
Smith & Wesson	PERFORMANCE CENTER® Model 627	170133	YES	https://www.smith-wesson.com/firearms/performance-center-model-627-0
Smith & Wesson	M&P®340 CT Crimson Trace® Lasergrps®	163073	YES	https://www.smith-wesson.com/firearms/mp-340-ct-crimson-trace-lasergrps
Smith & Wesson	PERFORMANCE CENTER® Model 460XVR™	170280	YES	https://www.smith-wesson.com/firearms/performance-center-model-460xvr
Smith & Wesson	Model 640	163690	YES	https://www.smith-wesson.com/firearms/model-640
Smith & Wesson	Model 66	162662	YES	https://www.smith-wesson.com/firearms/model-66
Smith & Wesson	PERFORMANCE CENTER® Model 629	170135	YES	https://www.smith-wesson.com/firearms/performance-center-model-629-0
Smith & Wesson	Model 649	163210	YES	https://www.smith-wesson.com/firearms/mp-del-649

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Smith & Wesson	Model 642 LS LADYSMITH™	163808	YES	https://www.smith-wesson.com/firearms/model-642-ls-ladysmith
Smith & Wesson	Model 67	162802	YES	https://www.smith-wesson.com/firearms/model-67
Smith & Wesson	PERFORMANCE CENTER® Model 629 V-Comp	170137	YES	https://www.smith-wesson.com/firearms/performance-center-model-629-v-comp
Smith & Wesson	Model 329PD	163414	YES	https://www.smith-wesson.com/firearms/model-329pd
Smith & Wesson	Model 642	163810	YES	https://www.smith-wesson.com/firearms/model-642
Smith & Wesson	Model 442	162810	YES	https://www.smith-wesson.com/firearms/model-442
Smith & Wesson	PERFORMANCE CENTER® Model 625	170161	YES	https://www.smith-wesson.com/firearms/performance-center-model-625
Smith & Wesson	Model 460XVR™	163460	YES	https://www.smith-wesson.com/firearms/model-460xvr
Smith & Wesson	Model 642 CT Crimson Trace® Lasergrips®	163811	YES	https://www.smith-wesson.com/firearms/model-642-ct-crimson-trace-lasergrips
Smith & Wesson	Model 637	163050	YES	https://www.smith-wesson.com/firearms/model-637
Smith & Wesson	PERFORMANCE CENTER® 586 L-Comp	170170	YES	https://www.smith-wesson.com/firearms/performance-center-586-l-comp
Smith & Wesson	Model 460V Revolver	163465	YES	https://www.smith-wesson.com/firearms/model-460v-revolver
Smith & Wesson	Model 686 Plus	164192	YES	https://www.smith-wesson.com/firearms/model-686-plus
Smith & Wesson	Model 637 Crimson Trace® Lasergrip®	163052	YES	https://www.smith-wesson.com/firearms/model-637-crimson-trace-lasergrip
Smith & Wesson	PERFORMANCE CENTER® Model 629	170181	YES	https://www.smith-wesson.com/firearms/performance-center-model-629
Smith & Wesson	Model S&W500™	163500	YES	https://www.smith-wesson.com/firearms/model-sw500
Smith & Wesson	Model 686 Plus	164194	YES	https://www.smith-wesson.com/firearms/model-686-plus-0
Smith & Wesson	Model 442 Revolver - No Internal Lock	150544	YES	https://www.smith-wesson.com/firearms/model-442-revolver-no-internal-lock
Smith & Wesson	Model 642	10186	YES	https://www.smith-wesson.com/firearms/model-642-0
Smith & Wesson	Model 686 Plus 3-5-7 Magnum Series	150853	YES	https://www.smith-wesson.com/firearms/model-686-plus-3-5-7-magnum-series
Smith & Wesson	Model 29 - S&W Classics 4" Blue	150254	NO	https://www.smith-wesson.com/firearms/model-29-sw-classics-4-blue
Smith & Wesson	Model 686 Deluxe	150854	YES	https://www.smith-wesson.com/firearms/model-686-deluxe

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Smith & Wesson	Model 686 Plus 3-5-7 Magnum Series	150855	YES	https://www.smith-wesson.com/firearms/model686-plus-3-5-7-magnum-series-1
Smith & Wesson	Model 442 LaserMax	10239	NO	https://www.smith-wesson.com/firearms/model442-lasemax
Smith & Wesson	Model 60	162420	YES	https://www.smith-wesson.com/firearms/model60
Smith & Wesson	Model 25 - S&W Classics 6 1/2" Blue	150256	YES	https://www.smith-wesson.com/firearms/model25-sw-classics-6-12-blue
Smith & Wesson	Model 686 Plus Deluxe	150713	YES	https://www.smith-wesson.com/firearms/model686-plus-deluxe-0
Smith & Wesson	Model 637 LaserMax	10240	NO	https://www.smith-wesson.com/firearms/model637-lasemax
Smith & Wesson	Model 60 3"	162430	YES	https://www.smith-wesson.com/firearms/model60-3
Smith & Wesson	Model 27	150339	YES	https://www.smith-wesson.com/firearms/model27
Smith & Wesson	Model 629 Deluxe	150714	YES	https://www.smith-wesson.com/firearms/model629-deluxe
Smith & Wesson	Model 638 LaserMax	10241	NO	https://www.smith-wesson.com/firearms/model638-lasemax
Smith & Wesson	Model 586 6" Barrel	150908	YES	https://www.smith-wesson.com/firearms/model586-6-barrel
Smith & Wesson	Model 64	162506	YES	https://www.smith-wesson.com/firearms/model64
Smith & Wesson	Model 27 - S&W Classics 6 1/2" Blue	150341	YES	https://www.smith-wesson.com/firearms/model27-sw-classics-6-12-blue
Smith & Wesson	Model 57 - S&W Classics 6" .41 Magnum	150481	YES	https://www.smith-wesson.com/firearms/model57-sw-classics-6-41-magnum
Smith & Wesson	Model 10	150786	YES	https://www.smith-wesson.com/firearms/model10
Smith & Wesson	Model 642 LaserMax	10140	NO	https://www.smith-wesson.com/firearms/model642-lasemax
Smith & Wesson	Model 36 Classics	150184	YES	https://www.smith-wesson.com/firearms/model36-classics
Smith & Wesson	Model 69	162069	YES	https://www.smith-wesson.com/firearms/model69
Smith & Wesson	Model 43 C	103043	YES	https://www.smith-wesson.com/firearms/model43-c
Smith & Wesson	Model 586 4" Barrel	150909	YES	https://www.smith-wesson.com/firearms/model586-4-barrel
Smith & Wesson	17-9 Masterpiece	150477	YES	https://oag.ca.gov/firearms/handgun/17-9-masterpiece-sku-150477a
Smith & Wesson	22A-1 (Bull Barrel) Alloy, Stainless Steel	107431	YES	https://oag.ca.gov/firearms/handgun/22a-1-bull-barrel-sku-107431

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Smith & Wesson	22A-1 Gray Frame Alloy, Stainless Steel	107412	YES	https://oag.ca.gov/firearms/handgun/22a-1-gray-frame-sku-107412
Smith & Wesson	22A-1 Alloy, Stainless Steel	107410	YES	https://oag.ca.gov/firearms/handgun/22a-1-sku-107410
Smith & Wesson	29-10 (Blue) / Steel	150145	YES	https://oag.ca.gov/firearms/handgun/29-10-blue-sku-150145a
Smith & Wesson	351 Aluminum Alloy	160228	YES	https://oag.ca.gov/firearms/handgun/351-sku-160228b
Smith & Wesson	351C (Black)	103351	YES	https://oag.ca.gov/firearms/handgun/351c-black-sku-103351
Smith & Wesson	360J Scandium alloy, Stainless Steel	11713	YES	https://oag.ca.gov/firearms/handgun/360j-sku-11713
Smith & Wesson	48-7 (Black) A	150717	YES	https://oag.ca.gov/firearms/handgun/48-7-black-sku-150717a
Smith & Wesson	48-7 (Black) B	150718	YES	https://oag.ca.gov/firearms/handgun/48-7-black-sku-150718a
Smith & Wesson	60-14 Lady Smith	162414	YES	https://oag.ca.gov/firearms/handgun/60-14-lady-smith-sku-162414a
Smith & Wesson	60-15 (S&W Logo Grip) (NRA Engraved)	12489	YES	https://oag.ca.gov/firearms/handgun/60-15-sw-logo-grip-nra-engraved-sku-12489
Smith & Wesson	617-6 (S&W Logo Grip)	160578	YES	https://oag.ca.gov/firearms/handgun/617-6-sw-logo-grip-sku-160578
Smith & Wesson	617-6	160584A	YES	https://oag.ca.gov/firearms/handgun/617-6-sku-160584a
Smith & Wesson	625-8 JM	160936A	YES	https://oag.ca.gov/firearms/handgun/625-8-jm-sku-160936a
Smith & Wesson	629-6 M629 Deluxe 3"	150715	YES	https://oag.ca.gov/firearms/handgun/629-6-m629-deluxe-3-sku-150715
Smith & Wesson	638-3	150468	YES	https://oag.ca.gov/firearms/handgun/638-3-sku150468
Smith & Wesson	640-1 A	103690	YES	https://oag.ca.gov/firearms/handgun/640-1-sku-103690a
Smith & Wesson	640-1	150784	YES	https://oag.ca.gov/firearms/handgun/640-1-sku150784
Smith & Wesson	642-1	103810	YES	https://oag.ca.gov/firearms/handgun/642-1-sku-103810a
Smith & Wesson	642-2 Range Kit Bundle	13307	YES	https://oag.ca.gov/firearms/handgun/642-2-range-kit-bundle-sku-13307
Smith & Wesson	647-1	170229	YES	https://oag.ca.gov/firearms/handgun/647-1-sku-170229a
Smith & Wesson	686-6 M686	150712	YES	https://oag.ca.gov/firearms/handgun/686-6-m686-sku-150712
Smith & Wesson	Bodyguard 38	103038	YES	https://oag.ca.gov/firearms/handgun/bodyguard-38-matte-black-sku-103038a

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Smith & Wesson	BodyGuard 38-1 Crimson Trace Laser	12933	YES	https://oag.ca.gov/firearms/handgun/bodyguard-38-1-crimson-trace-laser-sku-12933
Smith & Wesson	M&P 340 (Matte Black)	103072	YES	https://oag.ca.gov/firearms/handgun/mp-340-matte-black-sku-103072
Smith & Wesson	M&P 40 Shield (FDE)	13005	YES	https://oag.ca.gov/firearms/handgun/mp-40-shield-fde-sku-13005
Smith & Wesson	M&P 9 Shield (Blk) (Carry Kit)	12550	YES	https://oag.ca.gov/firearms/handgun/mp-9-shield-blk-carry-kit-sku-12550
Smith & Wesson	M&P 9 Shield (FDE)	13004	YES	https://oag.ca.gov/firearms/handgun/mp-9-shield-fde-sku-13004
Smith & Wesson	M&P 9 Shield (FDE)	13286	YES	https://oag.ca.gov/firearms/handgun/mp-9-shield-fde-sku-13286
Smith & Wesson	M&P 9 Shield (OD Green)	13287	YES	https://oag.ca.gov/firearms/handgun/mp-9-shield-od-green-sku-13287
Smith & Wesson	M&P40 Shield	187020	YES	https://oag.ca.gov/firearms/handgun/mp40-shield-sku-187020
Smith & Wesson	M&P9 SHIELD (Robin's Egg Blue)	13394	YES	https://oag.ca.gov/firearms/handgun/mp9-shield-robin-s-egg-blue-sku-13394
Smith & Wesson	M29-10	150783	YES	https://oag.ca.gov/firearms/handgun/m29-10-sku-150783
Smith & Wesson	M360 Scandium alloy; PVD finish	11749	YES	https://oag.ca.gov/firearms/handgun/m360-sku-11749
Smith & Wesson	M360 Survival Kit	12601	YES	https://oag.ca.gov/firearms/handgun/m360-sku-12601-survival-kit
Smith & Wesson	M422-2	150469	YES	https://oag.ca.gov/firearms/handgun/m422-2-sku-150469
Smith & Wesson	M442-1	150785	YES	https://oag.ca.gov/firearms/handgun/m442-1-sku-150785
Smith & Wesson	M637-2	170347	YES	https://oag.ca.gov/firearms/handgun/m637-2-sku-170347
Smith & Wesson	M642-1	150972	YES	https://oag.ca.gov/firearms/handgun/m642-1-sku-150972
Smith & Wesson	M642-2	150466	YES	https://oag.ca.gov/firearms/handgun/m642-2-sku-150466
Smith & Wesson	M69 A	162069A	YES	https://oag.ca.gov/firearms/handgun/m69-sku-162069a
Smith & Wesson	M929 A	170341A	YES	https://oag.ca.gov/firearms/handgun/m929-sku-170341a
Smith & Wesson	M929 B	170341B	YES	https://oag.ca.gov/firearms/handgun/m929-sku-170341b
Smith & Wesson	SD40 VE	13049	YES	https://oag.ca.gov/firearms/handgun/sd40-ve-sku-13049
Smith & Wesson	SD9 VE (Two-Tone)	13048	YES	https://oag.ca.gov/firearms/handgun/sd9-ve-two-tone-sku-13048

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Springfield Armory	XD-M 4.5" .45	XDMT94545BHCE	NO	https://www.springfield-armory.com/xd-series-handguns/xd-m-handguns/xd-m-45-threaded-45-acc-handgun
Springfield Armory	XD-M® 4.5" OSP 10mm	XDMT94510BHCO SP	NO	https://www.springfield-armory.com/xd-series-handguns/xd-m-handguns/xd-m-45-osp-threaded-10mm-handgun
Springfield Armory	XD-M® Elite 4.5 OSP 9mm	XDMET9459BHCO SP	NO	https://www.springfield-armory.com/xd-series-handguns/xd-m-elite-handguns/xd-m-elite-45-osp-threaded-9mm-handgun/
Springfield Armory	Helicat® 3" Micro-Compact OSP™ Handgun	HC9319FOSP	NO	https://www.springfield-armory.com/helicat-series-handguns/helicat-3-micro-compact-handguns/helicat-3-micro-compact-osp-9mm-handgun-desert-fde/
Springfield Armory	Helicat® 3" Micro-Compact Handgun	HC9319F	NO	https://www.springfield-armory.com/helicat-series-handguns/helicat-3-micro-compact-handguns/helicat-3-micro-compact-9mm-handgun-fde/
Springfield Armory	Helicat® 3" Micro-Compact OSP™ Handgun	HC9319BOSP	NO	https://www.springfield-armory.com/helicat-series-handguns/helicat-3-micro-compact-handguns/helicat-3-micro-compact-osp-9mm-handgun/
Springfield Armory	Helicat® 3" Micro-Compact Handgun	HC9319B	NO	https://www.springfield-armory.com/helicat-series-handguns/helicat-3-micro-compact-handguns/helicat-3-micro-compact-9mm-handgun/
Springfield Armory	Helicat® 3" Micro-Compact OSP™ Handgun w/ Shield SMC	HC9319BOSPMSC	NO	https://www.springfield-armory.com/helicat-series-handguns/helicat-3-micro-compact-handguns/helicat-3-micro-compact-osp-9mm-handgun-smsc/
Springfield Armory	1911 EMP® Handgun 9mm Stainless	PI9209L	YES	https://www.springfield-armory.com/1911-series-handguns/1911-emp-handguns/1911-emp-9mm-handgun-stainless/
Springfield Armory	1911 EMP® Handgun 9mm Black	PI9208L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-emp-handguns/1911-emp-9mm-handgun/
Springfield Armory	1911 EMP® Champion™ Handgun	PI9211L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-emp-handguns/1911-emp-champion-concealed-carry-9mm-handgun-stainless/
Springfield Armory	1911 EMP® Champion™ Concealed Carry Contour Handgun	PI9229L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-emp-handguns/1911-emp-champion-concealed-carry-9mm-handgun-stainless/
Springfield Armory	1911 EMP® Champion™ Concealed Carry Contour Handgun	PI9229F	NO	https://www.springfield-armory.com/1911-series-handguns/1911-emp-handguns/1911-emp-champion-concealed-carry-9mm-handgun-desert-fde/
Springfield Armory	1911 Ronin™ Handgun	PX9119L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-ronin-handguns/1911-ronin-operator-9mm-handgun/
Springfield Armory	1911 Ronin™ 4.25" Handgun	PX9117L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-ronin-handguns/1911-ronin-operator-425-9mm-handgun/
Springfield Armory	1911 Ronin™ Handgun	PX9120L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-ronin-handguns/1911-ronin-operator-45-acc-handgun/
Springfield Armory	1911 Ronin™ 4.25" Handgun	PX9118L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-ronin-handguns/1911-ronin-operator-425-45-acc-handgun/
Springfield Armory	1911 Ronin™ Handgun	PX9121L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-ronin-handguns/1911-ronin-10-mm-handgun/
Springfield Armory	1911 Range Officer® Compact Handgun	PI9125L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-range-officer-handguns/1911-range-officer-compact-9mm-handgun/
Springfield Armory	1911 Range Officer® Compact Handgun	PI9126L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-range-officer-handguns/1911-range-officer-compact-45-acc-handgun/
Springfield Armory	1911 Range Officer® Compact Handgun	PI9129L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-range-officer-handguns/1911-range-officer-target-9mm-handgun/
Springfield Armory	1911 Range Officer® Target Handgun	PI9122L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-range-officer-handguns/1911-range-officer-target-9mm-handgun-stainless/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Springfield Armory	1911 Range Officer® Target Handgun	PI9128L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-range-officer-handguns/1911-range-officer-target-45-acp-handgun/
Springfield Armory	1911 Range Officer® Target Handgun	PI9124L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-range-officer-handguns/1911-range-officer-target-45-acp-handgun-stainless/
Springfield Armory	1911 Range Officer® Target Handgun	PI9130L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-range-officer-handguns/1911-range-officer-operator-9mm-handgun/
Springfield Armory	1911 Range Officer® Operator® Handgun	PI9131L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-range-officer-handguns/1911-range-officer-operator-9mm-handgun/
Springfield Armory	1911 Range Officer® Operator® Handgun	PI9137L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-range-officer-handguns/1911-range-officer-champion-9mm-handgun/
Springfield Armory	1911 Range Officer® Champion™ Handgun	PI9136L	NO	https://www.springfield-armory.com/1911-series-handguns/1911-range-officer-handguns/1911-range-officer-champion-45-acp-handgun/
Springfield Armory	1911 RO Elite Operator® Handgun	PI9110E	NO	https://www.springfield-armory.com/1911-series-handguns/1911-ro-elite-handguns/
Springfield Armory	1911 Mil-Spec Handgun	PB9151L	YES	https://www.springfield-armory.com/1911-mil-spec-handguns/1911-mil-spec-handguns/1911-mil-spec-45-acp-handgun-stainless/
Springfield Armory	1911 Mil-Spec Handgun	PB9108L	YES	https://www.springfield-armory.com/1911-mil-spec-handguns/1911-mil-spec-handguns/1911-mil-spec-45-acp-handgun/
Springfield Armory	Defend Your Legacy Series 1911 Mil-Spec Handgun	PB9108L	YES	https://www.springfield-armory.com/1911-series-handguns/1911-mil-spec-handguns/defend-your-legacy-series-1911-mil-spec-45-acp-handgun/
Springfield Armory	1911 Loaded Marine Corps. Operator® Handgun	PX9110ML18	NO	https://www.springfield-armory.com/1911-series-handguns/1911-loaded-handguns/1911-loaded-marine-corps-operator-g10-grips-45-acp-handgun/
Springfield Armory	1911 Loaded Marine Corps. Operator® Handgun	PX9105ML18	YES	https://www.springfield-armory.com/1911-series-handguns/1911-loaded-handguns/1911-loaded-marine-corps-operator-pachmayr-grips-45-acp-handgun/
Springfield Armory	1911 Loaded Operator® Handgun	PX9105LL18	NO	https://www.springfield-armory.com/1911-series-handguns/1911-loaded-handguns/1911-loaded-operator-45-acp-handgun/
Springfield Armory	1911 Loaded Handgun	PX9109L	YES	https://www.springfield-armory.com/1911-series-handguns/1911-loaded-handguns/1911-loaded-45-acp-handgun/
Springfield Armory	1911 Loaded Handgun	PX9151L	YES	https://www.springfield-armory.com/1911-series-handguns/1911-loaded-handguns/1911-loaded-45-acp-handgun-stainless/
Springfield Armory	1911 Vickers Tactical Master Class Handgun	PC9108LAV	NO	https://www.springfield-armory.com/1911-series-handguns/1911-vickers-tactical-handguns/1911-vickers-tactical-master-class-45-acp-handgun/
Springfield Armory	1911 TRP™ Handgun	PC9108L18	NO	https://www.springfield-armory.com/1911-series-handguns/1911-trp-handguns/1911-trp-45-acp-handgun/
Springfield Armory	1911 TRP™ Handgun	PC9107L18	YES	https://www.springfield-armory.com/1911-series-handguns/1911-trp-handguns/1911-trp-45-acp-handgun-stainless/
Springfield Armory	1911 TRP™ Operator® Handgun	PC9105L18	NO	https://www.springfield-armory.com/1911-series-handguns/1911-trp-handguns/1911-trp-operator-45-acp-handgun/
Springfield Armory	1911 TRP™ Operator® Handgun	PC9510L18	NO	https://www.springfield-armory.com/1911-series-handguns/1911-trp-handguns/1911-trp-operator-45-acp-handgun/
Springfield Armory	1911 TRP™ Operator® Longslide Handgun	PC9610L18	NO	https://www.springfield-armory.com/1911-series-handguns/1911-trp-handguns/1911-trp-operator-longslide-10mm-handgun/
Springfield Armory	1911 Custom Carry Handgun	PC9102	YES	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-custom-carry-45-acp-handgun/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Springfield Armory	1911 Ultimate Carry Handgun	PC9102UC	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-ultimate-carry-45-acp-handgun/
Springfield Armory	1911 Ultimate Carry Handgun	PC9102UC-9	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-ultimate-carry-9mm-handgun/
Springfield Armory	1911 Compact Carry Handgun	PC9104CC	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-compact-carry-45-acp-handgun/
Springfield Armory	1911 Compact Carry Handgun	PC9104CC-9	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-compact-carry-9mm-handgun/
Springfield Armory	1911 National Match Hardball Handgun	PC9502	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-national-match-hardball-45-acp-handgun/
Springfield Armory	1911 National Match Hardball Handgun	PC9502-9	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-national-match-hardball-9mm-handgun/
Springfield Armory	1911 Bullseye Wadoutler Handgun	PC9302	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-bullseye-wadoutler-45-acp-handgun/
Springfield Armory	1911 Bullseye Wadoutler Handgun	PC9302-9	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-bullseye-wadoutler-9mm-handgun/
Springfield Armory	1911 PPC Distinguished Handgun	PC9803PPC	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-ppc-distinguished-45-acp-handgun/
Springfield Armory	1911 PPC Distinguished Handgun	PC9803PPC-9	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-ppc-distinguished-9mm-handgun/
Springfield Armory	1911 Distinguished Classic Handgun	PC9404DC	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-distinguished-classic-45-acp-handgun/
Springfield Armory	1911 Distinguished Classic Handgun	PC9404DC-9	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-distinguished-classic-9mm-handgun/
Springfield Armory	1911 Single Stack Classic Handgun	PC9SSC	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-single-stack-classic-45-acp-handgun/
Springfield Armory	1911 Single Stack Classic Handgun	PC9SSC-9	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-single-stack-classic-9mm-handgun/
Springfield Armory	1911 TGO 1 Handgun	PC9206	YES	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-tgo-1-45-acp-handgun/
Springfield Armory	1911 Professional Handgun	PC9111	YES	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-professional-45-acp-handgun/
Springfield Armory	1911 Professional Handgun	PC9119	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-professional-9mm-handgun/
Springfield Armory	1911 Professional Light Rail Handgun	PC9111LR	YES	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-professional-light-rail-45-acp-handgun/
Springfield Armory	1911 Professional Light Rail Handgun	PC9119LR	NO	https://www.springfield-armory.com/1911-series-handguns/custom-handguns/1911-professional-light-rail-9mm-handgun/
Springfield Armory	Defend Your Legacy Series XD® 3" Sub-Compact Handgun	XD98601HC	NO	https://www.springfield-armory.com/xd-series-handguns/xd-handguns/defend-your-legacy-series-45-sub-compact-9mm-handgun/
Springfield Armory	Defend Your Legacy Series XD® 4" Service Model Handgun	XDD9101HC	NO	https://www.springfield-armory.com/xd-series-handguns/xd-handguns/defend-your-legacy-series-45-service-model-9mm-handgun/
Springfield Armory	XD-M® 4.5" Handgun	XDM94545BHCE	NO	https://www.springfield-armory.com/xd-series-handguns/xd-m-handguns/xd-m-45-45-acp-handgun/

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exempt)?	LINK TO PRODUCT
Springfield Armory	911 2.7" Alpha Handgun	PG9108	NO	https://www.springfield-armory.com/911-series-handguns/911-27-alpha-380-acb-handgun-nitride/
Springfield Armory	911 2.7" Alpha Handgun	PG9108S	NO	https://www.springfield-armory.com/911-series-handguns/911-27-alpha-380-acb-handgun-stainless/
Springfield Armory	911 3" Handgun	PG9119	NO	https://www.springfield-armory.com/911-series-handguns/911-3-9mm-handgun-nitride/
Springfield Armory	911 3" Handgun	PG9119S	NO	https://www.springfield-armory.com/911-series-handguns/911-3-9mm-handgun-stainless/
Springfield Armory	911 3" Handgun w/ SA Rubber Grips	PG9119H		https://www.springfield-armory.com/911-series-handguns/911-3-9mm-handgun-sa-rubber-grips-nitride/
Springfield Armory	PB9108L / Carbon Steel	PB9108L	YES	https://oag.ca.gov/firearms/handgun/pb9108l
Springfield Armory	PB9113L (ambi safety) / Steel	PB9113L	YES	https://oag.ca.gov/firearms/handgun/pb9113l-ambi-safety
Springfield Armory	PC9105LCA / Steel	PC9105LCA	YES	https://oag.ca.gov/firearms/handgun/pc9105lca
Springfield Armory	PC9107LCA-G10 / Stainless Steel	PC9107LCA-G10	YES	https://oag.ca.gov/firearms/handgun/pc9107lca-g10
Springfield Armory	PC9108L (ambi safety) / Carbon Steel	PC9108L	YES	https://oag.ca.gov/firearms/handgun/pc9108l-ambi-safety
Springfield Armory	PC9108L (wood grips) / Carbon Steel	PC9108L	YES	https://oag.ca.gov/firearms/handgun/pc9108l-wood-grips
Springfield Armory	PC9108LCA-G10 / Carbon Steel	PC9108LCA-G10	YES	https://oag.ca.gov/firearms/handgun/pc9108lca-g10
Springfield Armory	PC9108LFDECA / Carbon Steel	PC9108LFDECA	YES	https://oag.ca.gov/firearms/handgun/pc9108lfdeca
Springfield Armory	PC9108LYCA / Carbon Steel	PC9108LYCA	YES	https://oag.ca.gov/firearms/handgun/pc9108lyca
Springfield Armory	PC9111 (ambi safety) / Carbon Steel	PC9111	YES	https://oag.ca.gov/firearms/handgun/pc9111-ambi-safety
Springfield Armory	PC9111FDECA / Carbon Steel	PC9111FDECA	YES	https://oag.ca.gov/firearms/handgun/pc9111fdeca
Springfield Armory	PC9111YCA / Carbon Steel	PC9111YCA	YES	https://oag.ca.gov/firearms/handgun/pc9111yca
Springfield Armory	PI9132L (ambi safety)	PI9132L	YES	https://oag.ca.gov/firearms/handgun/pi9132l-ambi-safety
Springfield Armory	PI9134L (ambi safety) / Stainless Steel	PI9134L	YES	https://oag.ca.gov/firearms/handgun/pi9134l-ambi-safety
Springfield Armory	PI9140L (ambi safety) / Stainless Steel	PI9140L	YES	https://oag.ca.gov/firearms/handgun/pi9140l-ambi-safety
Springfield Armory	PX9105MFDEFOCA / Carbon Steel	PX9105MFDEFOCA	YES	https://oag.ca.gov/firearms/handgun/p9105mfdefoca
Springfield Armory	PX9130L (ambi safety) / Stainless Steel	PX9130L	YES	https://oag.ca.gov/firearms/handgun/p9130l-ambi-safety

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or, exempt)?	LINK TO PRODUCT
Springfield Armory	PX9142L (ambi safety) / Stainless Steel	PX9142L	YES	https://oag.ca.gov/firearms/handgun/p9142l-ambi-safety
Springfield Armory	PX9149L / Alloy, Carbon Steel	PX9149L	YES	https://oag.ca.gov/firearms/handgun/p9149l
Springfield Armory	PX9161L (ambi safety) / Stainless Steel	PX9161L	YES	https://oag.ca.gov/firearms/handgun/p9161l-ambi-safety
Springfield Armory	PX9511L (ambi safety)	PX9511L	YES	https://oag.ca.gov/firearms/handgun/p9511l-ambi-safety
Springfield Armory	PX9608L (ambi safety) / Carbon Steel	PX9608L	YES	https://oag.ca.gov/firearms/certified-handguns/search?make=150975
Springfield Armory	PX9628L (ambi safety) / Stainless Steel	PX9628L	YES	https://oag.ca.gov/firearms/handgun/p9628l-ambi-safety
Springfield Armory	PX9801L (ambi safety) / Alloy, Stainless Steel	PX9801L	YES	https://oag.ca.gov/firearms/handgun/p9801l-ambi-safety
Springfield Armory	XD9101 / Steel, Polymer	XD9101	YES	https://oag.ca.gov/firearms/handgun/xd9101
Springfield Armory	XD9102 / Polymer, Steel	XD9102	YES	https://oag.ca.gov/firearms/handgun/xd9102
Springfield Armory	XD9161 / Polymer, Steel	XD9161	YES	https://oag.ca.gov/firearms/handgun/xd9161
Springfield Armory	XD9162 / Polymer, Steel	XD9162	YES	https://oag.ca.gov/firearms/handgun/xd9162
Springfield Armory	XD9201 / Steel, Polymer	XD9201	YES	https://oag.ca.gov/firearms/handgun/xd9201
Springfield Armory	XD9301 / Steel, Polymer	XD9301	YES	https://oag.ca.gov/firearms/handgun/xd9301
Springfield Armory	XD9302 / Polymer, Steel	XD9302	YES	https://oag.ca.gov/firearms/handgun/xd9302
Springfield Armory	XD9401 / Polymer, Steel	XD9401	YES	https://oag.ca.gov/firearms/handgun/xd9401
Springfield Armory	XD9611 / Polymer, Steel	XD9611	YES	https://oag.ca.gov/firearms/handgun/xd9611
Springfield Armory	XD9621 / Polymer, Steel	XD9621	YES	https://oag.ca.gov/firearms/handgun/xd9621
Springfield Armory	XD9645 / Polymer, Steel	XD9645	YES	https://oag.ca.gov/firearms/handgun/xd9645
Springfield Armory	XD9801 / Composite, Steel	XD9801	YES	https://oag.ca.gov/firearms/handgun/xd9801
Springfield Armory	XD9802 / Polymer, Steel	XD9802	YES	https://oag.ca.gov/firearms/handgun/xd9802
Springfield Armory	XD9802FDEFOCA / Polymer, Steel	XD9802FDEFOCA	YES	https://oag.ca.gov/firearms/handgun/xd9802fdefocaa
Springfield Armory	XD9802YFOCA / Polymer, Steel	XD9802YFOCA	YES	https://oag.ca.gov/firearms/handgun/xd9802yfoca

MANUFACTURER	MODEL	# / SKU	ON ROSTER (or exemp)?	LINK TO PRODUCT
Springfield Armory	XD9811 / Composite, Steel	XD9811	YES	https://oag.ca.gov/firearms/handgun/xd9811
Springfield Armory	XD9812 / Polymer, Steel	XD9812	YES	https://oag.ca.gov/firearms/handgun/xd9812
Springfield Armory	XD9821 / Polymer, Stainless Steel	XD9821	YES	https://oag.ca.gov/firearms/handgun/xd9821
Springfield Armory	XD9822 / Polymer, Stainless Steel	XD9822	YES	https://oag.ca.gov/firearms/handgun/xd9822

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9
 10 IN THE UNITED STATES DISTRICT COURT
 11 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
 12
 13

14 **LANA RAE RENNA et al.,**
 15 Plaintiffs,
 16 v.
 17 **ROB BONTA, in his official capacity**
 18 **as Attorney General of California;**
 19 **and ALLISON MENDOZA, in her**
 20 **official capacity as Director of the**
 21 **Department of Justice Bureau of**
 22 **Firearms,**
 23 Defendants.
 24
 25
 26
 27
 28

Case No. 3:20-cv-02190-DMS-DEB

**NOTICE OF PRELIMINARY
INJUNCTION APPEAL**

Judge: The Honorable Dana M. Sabraw

Action Filed: 11/10/2020

CERTIFICATE OF SERVICE

Case Name: **Lana Rae Renna et al. v. Rob Bonta, et al.** No. **3:20-cv-02190-DMS-DEB**

I hereby certify that on April 14, 2023, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

NOTICE OF PRELIMINARY INJUNCTION APPEAL

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on April 14, 2023, at Sacramento, California.

Ritta Mashriqi
Declarant

/s/Ritta Mashriqi
Signature

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37080986.docx

APPEAL

U.S. District Court
Southern District of California (San Diego)
CIVIL DOCKET FOR CASE #: 3:20-cv-02190-DMS-DEB

Renna et al v Becerra et al
Assigned to: Judge Dana M. Sabraw
Referred to: Magistrate Judge Daniel E. Butcher
Case in other court: USCA, 23-55367
Cause: 28:1343 Violation of Civil Rights

Date Filed: 11/10/2020
Jury Demand: None
Nature of Suit: 950 Constitutional - State Statute
Jurisdiction: Federal Question

Date Filed	#	Docket Text
11/10/2020	1	COMPLAINT Against Xavier Becerra, Luis Lopez (Filing fee \$400.00 receipt number ACASDC-14840446.), filed by Lana Rae Renna, Danielle Jaymes, Hannah Spousta, Laura Schwartz, Michael Schwartz, Richard Bailey, John Klier, Justin Smith, John Phillips, PWGG, L.P., Cheryl Prince, Darin Prince, North County Shooting Center, Inc., Ryan Peterson, Gunfighter Tactical, LLC, Firearms Policy Coalition, Inc., San Diego County Gun Owners PAC, Citizens Committee for the Right to Keep and Bear Arms, Second Amendment Foundation, (Attachments: # 1 Civil Cover Sheet) The new case number is 3:20-cv-2190-DMS-DEB. Judge Dana M. Sabraw and Magistrate Judge Daniel E. Butcher are assigned to the case. (DiGuissepe, Raymond)(zda) (Entered: 11/10/2020)
11/10/2020	2	Summons Issued. Counsel receiving this notice electronically should print this summons and serve it in accordance with Rule 4, Fed.R.Civ.P and LR 4.1. (zda) (Entered: 11/10/2020)
11/10/2020	4	NOTICE OF RELATED CASE(S) by Richard Bailey, Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith, Hannah Spousta of case(s) 3:17-cv-1017-BEN-JLB; 3:19-cv-01537-BEN-JLB; 3:19-cv-1662-BEN-JLB . (Attachments: # 1 Proof of Service) (DiGuissepe, Raymond) (mme). (Entered: 11/10/2020)
11/12/2020	5	OBJECTION by Xavier Becerra, Luis Lopez re 4 Notice of Related Case,, (Echeverria, John) (mme). (Entered: 11/12/2020)
12/04/2020	6	NOTICE of Appearance by Michael P Sousa on behalf of Richard Bailey, Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith, Hannah Spousta (Sousa, Michael)Attorney Michael P Sousa added to party Richard Bailey(pty:pla), Attorney Michael P Sousa added to party Citizens Committee for the Right to Keep and Bear Arms(pty:pla), Attorney Michael P Sousa added to party Firearms Policy Coalition,

		Inc.(pty:pla), Attorney Michael P Sousa added to party Gunfighter Tactical, LLC(pty:pla), Attorney Michael P Sousa added to party Danielle Jaymes(pty:pla), Attorney Michael P Sousa added to party John Klier(pty:pla), Attorney Michael P Sousa added to party North County Shooting Center, Inc.(pty:pla), Attorney Michael P Sousa added to party PWGG, L.P.(pty:pla), Attorney Michael P Sousa added to party Ryan Peterson(pty:pla), Attorney Michael P Sousa added to party John Phillips(pty:pla), Attorney Michael P Sousa added to party Cheryl Prince(pty:pla), Attorney Michael P Sousa added to party Darin Prince(pty:pla), Attorney Michael P Sousa added to party Lana Rae Renna(pty:pla), Attorney Michael P Sousa added to party San Diego County Gun Owners PAC(pty:pla), Attorney Michael P Sousa added to party Laura Schwartz(pty:pla), Attorney Michael P Sousa added to party Michael Schwartz(pty:pla), Attorney Michael P Sousa added to party Second Amendment Foundation (pty:pla), Attorney Michael P Sousa added to party Justin Smith(pty:pla), Attorney Michael P Sousa added to party Hannah Spousta(pty:pla) (jrm). (Entered: 12/04/2020)
12/22/2020	7	ORDER Following Status Conference. Plaintiffs may file a First Amended Complaint on or before January 4, 2021. Defendants shall file any motion to dismiss on or before January 25, 2021. Plaintiffs shall file any opposition to the motion to dismiss on or before February 15, 2021. Defendants shall file any reply on or before March 1, 2021. Following completion of the briefing, the Court will set a hearing date accordingly. Signed by Judge Dana M. Sabraw on 12/22/2020.(mme) (Entered: 12/22/2020)
12/22/2020	8	Minute Entry for proceedings held before Judge Dana M. Sabraw: Telephonic Status Conference held on 12/22/2020. (Plaintiff Attorney Raymond DiGuseppe, Michael Sousa). (Defendant Attorney Gabrielle Boutin). (no document attached) (jak) (Entered: 12/23/2020)
12/23/2020	9	NOTICE of Appearance <i>Notice of Appearance</i> by Gabrielle D. Boutin on behalf of Xavier Becerra, Luis Lopez (Boutin, Gabrielle)Attorney Gabrielle D. Boutin added to party Xavier Becerra(pty:dft), Attorney Gabrielle D. Boutin added to party Luis Lopez(pty:dft) (mme). (Entered: 12/23/2020)
01/04/2021	10	AMENDED COMPLAINT <i>FIRST</i> against All Defendants, filed by San Diego County Gun Owners PAC, Firearms Policy Coalition, Inc., Richard Bailey, Cheryl Prince, Laura Schwartz, John Phillips, Lana Rae Renna, John Klier, Ryan Peterson, North County Shooting Center, Inc., Darin Prince, Second Amendment Foundation, Danielle Jaymes, Michael Schwartz, Justin Smith, Citizens Committee for the Right to Keep and Bear Arms, PWGG, L.P., Gunfighter Tactical, LLC, Hannah Spousta, Robert Macomber, Clint Freeman.New Summons Requested. (DiGuseppe, Raymond) (mme). (Entered: 01/04/2021)
01/05/2021	11	Summons Issued as to First Amended Complaint. Counsel receiving this notice electronically should print this summons and serve it in accordance with Rule 4, Fed.R.Civ.P and LR 4.1. (Attachments: # 1 Attachment)(mme) (Entered: 01/05/2021)
01/25/2021	12	MOTION to Dismiss for Failure to State a Claim by Xavier Becerra, Luis Lopez. (Boutin, Gabrielle) (jmr). (Entered: 01/25/2021)
02/15/2021	13	RESPONSE in Opposition re 12 MOTION to Dismiss for Failure to State a Claim filed by Richard Bailey, Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego

		County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith, Hannah Spousta. (Attachments: # 1 Declaration G. Mocsary Declaration, # 2 Exhibit Mocsary Exhibit 1, # 3 Exhibit Mocsary Exhibit 2, # 4 Exhibit Mocsary Exhibit 3, # 5 Exhibit Mocsary Exhibit 4, # 6 Exhibit Mocsary Exhibit 5, # 7 Exhibit Mocsary Exhibit 6, # 8 Exhibit Mocsary Exhibit 7, # 9 Exhibit Mocsary Exhibit 8, # 10 Exhibit Mocsary Exhibit 9, # 11 Exhibit Mocsary Exhibit 10, # 12 Declaration J. Ostini Declaration, # 13 Exhibit Ostini Exhibit, # 14 Declaration C. Prince Declaration, # 15 Declaration D. Jaymes Declaration, # 16 Declaration D. Prince Declaration, # 17 Declaration H. Spousta Declaration, # 18 Declaration J. Klier Declaration, # 19 Declaration J. Phillips Declaration, # 20 Declaration J. Smith Declaration, # 21 Declaration L. Schwartz Declaration, # 22 Declaration M. Schwartz Declaration, # 23 Declaration R. Bailey Declaration, # 24 Declaration R. Macomber Declaration, # 25 Declaration R. Peterson Declaration)(DiGuissepe, Raymond) (mme). (Entered: 02/15/2021)
03/01/2021	14	RESPONSE in Support re 12 MOTION to Dismiss for Failure to State a Claim <i>REPLY IN SUPPORT OF MOTION TO DISMISS</i> filed by Xavier Becerra, Luis Lopez. (Boutin, Gabrielle) (mme). (Entered: 03/01/2021)
03/09/2021	15	ORDER Setting Status Conference. Pending before the Court is Defendants motion to dismiss Plaintiffs First Amended Complaint. On February 25, 2021, the Ninth Circuit vacated its decision in Duncan v. Becerra, No. 19-55376, and ordered the case be reheard en banc, which rehearing is currently scheduled for June 22, 2021. In light of this, the Court sets the present matter for a telephonic status conference on March 12, 2021 at 2:00 p.m. Signed by Chief District Judge Dana M. Sabraw on 3/9/2021.(mme) (Entered: 03/09/2021)
03/12/2021	16	Minute Entry for proceedings held before Chief District Judge Dana M. Sabraw: Status Conference held on 3/12/2021. All parties appeared telephonically. (Court Reporter/ECR Lee Ann Pence). (Plaintiff Attorney Raymond DiGuissepe, Michael Sousa). (Defendant Attorney Gabrielle Boutin). (no document attached) (jak) (Entered: 03/12/2021)
04/23/2021	17	ORDER Granting In Part and Denying In Part 12 Defendants' Motion to Dismiss. For the reasons set out above, the Court ORDERS as follows: 1. To the extent Plaintiffs first cause of action challenges the three UHA provisions upheld in Pena v. Lindley, 898 F.3d 969 (9th Cir. 2018), Defendants motion to dismiss is GRANTED. 2. Defendants motion to dismiss is DENIED in all other respects as to Count One of the FAC. 3. Defendants motion to dismiss is GRANTED as to Count Two of the FAC. 4. To the extent Defendants motion is granted, dismissal is without leave to amend.Signed by Chief District Judge Dana M. Sabraw on 4/23/2021. (mme) (Entered: 04/23/2021)
05/04/2021	18	Joint MOTION for Extension of Time to File Answer to the First Amended Complaint by Xavier Becerra, Luis Lopez. (Attachments: # 1 Declaration, # 2 Proposed Order on Joint Motion to Extend Time to Answer, # 3 Proof of Service)(Boutin, Gabrielle) (ag). (Entered: 05/04/2021)
05/04/2021	19	ORDER Granting 18 Joint Motion for an Order Extending Time for Defendants to File an Answer to the First Amended Complaint. The Court extends Defendants' deadline to file an answer to the First Amended Complaint to 5/14/2021. Signed by Chief District Judge Dana M. Sabraw on 5/4/2021. (ag) (Entered: 05/04/2021)
05/14/2021	20	ANSWER to 10 Amended Complaint,, by Xavier Becerra, Luis Lopez.(Boutin, Gabrielle) (jmo). (Entered: 05/14/2021)

05/27/2021	21	Request to Appear Pro Hac Vice (Filing fee received: \$ 213 receipt number ACASDC-15771154.) (Application to be reviewed by Clerk.) (Sack, William) (rmc). (Entered: 05/27/2021)
05/28/2021	22	ORDER Approving the Pro Hac Vice Application of William Aaron Sack, re 21 Request to Appear Pro Hac Vice. Signed by Chief District Judge Dana M. Sabraw on 5/28/2021.(rmc) (Entered: 05/28/2021)
07/21/2021	23	Notice and Order Setting Early Neutral Evaluation Conference; Rule 26 Compliance; and Case Management Conference. An Early Neutral Evaluation is set for 9/7/2021 at 1:30 PM before Magistrate Judge Daniel E. Butcher. In the event the case does not settle during the ENE, the Court will hold a Case Management Conference ("CMC") pursuant to Fed. R. Civ. P. 16(b) immediately following the conclusion of the ENE. A Joint Discovery Plan is due by 8/31/2021. Signed by Magistrate Judge Daniel E. Butcher on 7/21/2021.(ag) (Entered: 07/21/2021)
08/23/2021	24	Minute Entry for proceedings held before Magistrate Judge Daniel E. Butcher: Due to a conflict involving the Court's calendar, the Early Neutral Evaluation Conference and Case Management Conference on 9/7/2021 at 1:30 p.m. are vacated and reset for 9/23/2021 at 9:00 a.m.The deadline to submit confidential briefs, file the Joint Discovery Plan, and provide the Court with contact information for all participants is 9/16/2021.(no document attached) (kxb) (Entered: 08/23/2021)
09/16/2021	25	JOINT DISCOVERY PLAN by Xavier Becerra, Luis Lopez (Boutin, Gabrielle) (zda). (Entered: 09/16/2021)
09/21/2021	26	MOTION Modify Order Setting ENE Conference <i>Unopposed</i> by Richard Bailey, Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith, Hannah Spousta. (DiGuissepe, Raymond) (zda). (Entered: 09/21/2021)
09/21/2021	27	NOTICE of Appearance of <i>Additional Counsel</i> by Rita B. Bosworth on behalf of Xavier Becerra (Bosworth, Rita)Attorney Rita B. Bosworth added to party Xavier Becerra(pty:dft) (zda). (Entered: 09/21/2021)
09/22/2021	28	ORDER: Plaintiffs' Unopposed Motion to Modify Order Setting ENE Conference is granted. Dkt. No. 26. Signed by Magistrate Judge Daniel E. Butcher on 9/22/2021. (no document attached) (kxb) (Entered: 09/22/2021)
09/23/2021	29	Minute Entry for proceedings held before Magistrate Judge Daniel E. Butcher: Early Neutral Evaluation Conference and Case Management Conference held on 9/23/2021. Scheduling Order to issue. (Plaintiff Attorney Raymond DiGuissepe). (Defendant Attorneys Gabrielle Boutin and Rita Bosworth). (no document attached) (kxb) (Entered: 09/23/2021)
09/24/2021	30	SCHEDULING ORDER: Telephonic Status Conference set for 1/14/2022 09:00 AM before Magistrate Judge Daniel E. Butcher. Memorandum of Contentions of Fact and Law due by 1/20/2023. Proposed Pretrial Order due by 2/10/2023. Final Pretrial Conference set for 2/17/2023 10:30 AM before Chief District Judge Dana M. Sabraw. Bench Trial set for 3/20/2023 09:00 AM before Chief District Judge Dana M. Sabraw.Signed by Magistrate Judge Daniel E. Butcher on 9/24/2021.(zda) (Entered: 09/24/2021)

		09/27/2021)
11/23/2021	31	Joint MOTION to Amend/Correct 30 Scheduling Order, by Xavier Becerra, Luis Lopez. (Attachments: # 1 Proof of Service via CMECF and Email)(Bosworth, Rita)Attorney Rita B. Bosworth added to party Luis Lopez(pty:dft) (zda). (Entered: 11/23/2021)
11/29/2021	32	Order Granting Joint Motion to Amend Scheduling Order 31 . Signed by Magistrate Judge Daniel E. Butcher on 11/29/2021. (zda) (Entered: 11/29/2021)
01/14/2022	33	Minute Entry for proceedings held before Magistrate Judge Daniel E. Butcher: Status Conference held on January 14, 2022. A telephonic Status Conference will be held on April 15, 2022 at 10:00 a.m. before Magistrate Judge Daniel E. Butcher. Plaintiffs' counsel must arrange for counsel to call the Court's chambers on a shared line to participate. (Plaintiff Attorneys Raymond DiGuseppe & William Sack). (Defendant Attorney Rita Botsworth). (no document attached) (kxb) (Entered: 01/14/2022)
02/16/2022	34	NOTICE of Voluntary Dismissal by Richard Bailey, Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith, Hannah Spousta <i>As to Plaintiff Hannah Spousta Only</i> (DiGuseppe, Raymond) (zda). (Entered: 02/16/2022)
02/18/2022	35	MOTION to Withdraw as Attorney <i>as to Plaintiff Richard Bailey</i> by Richard Bailey, Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith, Hannah Spousta. (Attachments: # 1 Declaration Declaration of Raymond M. DiGuseppe)(DiGuseppe, Raymond) (zda). (Entered: 02/18/2022)
02/23/2022	36	Order On Motion to Withdraw as Counsel for Plaintiff Richard Bailey 35 . Attorney Michael P Sousa; Raymond Mark DiGuseppe and William Aaron Sack terminated. Signed by Chief District Judge Dana M. Sabraw on 2/23/2022. (zda) (Entered: 02/24/2022)
04/14/2022	37	**Withdrawn per doc. no. 40 ** MOTION to Dismiss <i>Under Rule 41 for Failure to Prosecute</i> by Xavier Becerra, Luis Lopez. (Attachments: # 1 Memo of Points and Authorities ISO, # 2 Declaration ISO)(Bosworth, Rita) (jpp). Modified on 4/26/2022 (anh). (Entered: 04/14/2022)
04/15/2022	38	Minute Entry for proceedings held before Magistrate Judge Daniel E. Butcher: Status Conference held on April 15, 2022. The Court sets a follow up telephonic Status Conference on July 15, 2022 at 9:00 a.m. Plaintiffs' counsel must arrange for counsel to call the Court's chambers on a shared line to participate. (Plaintiff Attorney Raymond Mark DiGuseppe). (Defendant Attorney Rita B. Bosworth). (no document attached) (Dech, E.) (Entered: 04/15/2022)
04/18/2022	39	CERTIFICATE OF SERVICE by Xavier Becerra, Luis Lopez re 37 MOTION to Dismiss <i>Under Rule 41 for Failure to Prosecute</i> (Bosworth, Rita) (jpp). (Entered: 04/18/2022)

04/25/2022	40	NOTICE OF WITHDRAWAL OF DOCUMENT by Xavier Becerra, Luis Lopez re 37 MOTION to Dismiss <i>Under Rule 41 for Failure to Prosecute</i> filed by Luis Lopez, Xavier Becerra . (Bosworth, Rita) (Entered: 04/25/2022)
04/25/2022	41	MOTION to Dismiss <i>Under Rule 41 for Failure to Prosecute</i> by Xavier Becerra, Luis Lopez. (Attachments: # 1 Memorandum of Points and Authorities in Support of Motion to Dismiss, # 2 Declaration of Rita Bosworth in Support of Motion to Dismiss) (Bosworth, Rita) (anh). (Entered: 04/25/2022)
05/24/2022	42	ORDER re: oral argument. Signed by Chief District Judge Dana M. Sabraw on 5/24/2022.(All non-registered users served via U.S. Mail Service)(jpp) (Entered: 05/24/2022)
05/27/2022	43	ORDER granting 41 Motion to Dismiss for failure to prosecute. Bailey has been provided repeated notice of the need to participate in this case, and ample time to do so. Given Baileys failure to prosecute, his case is hereby dismissed without prejudice. Signed by Chief District Judge Dana M. Sabraw on 5/27/2022. (All non-registered users served via U.S. Mail Service)(jpp) (Entered: 05/27/2022)
07/06/2022	44	Minute Entry for proceedings held before Magistrate Judge Daniel E. Butcher: Due to a conflict involving the Court's calendar, the July 15, 2022 Status Conference is vacated and reset for July 29, 2022 at 9:00 a.m. Plaintiffs' counsel must arrange for counsel to call the Court's chambers on a shared line to participate.(no document attached) (kxb) (Entered: 07/06/2022)
07/19/2022	45	Joint MOTION to Vacate <i>Scheduling Order</i> by Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith. (DiGuiseppe, Raymond) (jpp). (Entered: 07/19/2022)
07/22/2022	46	ORDER granting 45 Joint Motion to Vacate Scheduling Order. Signed by Magistrate Judge Daniel E. Butcher on 7/22/2022. (jpp) (Entered: 07/22/2022)
07/29/2022	47	Minute Entry for proceedings held before Magistrate Judge Daniel E. Butcher: Status Conference held. A telephonic Status Conference will be held on September 23, 2022 at 9:00 a.m. Plaintiff's counsel must arrange for counsel to call the Court's chambers on a shared line to participate.(Plaintiffs Attorney Raymond DiGuiseppe). (Defendants Attorney Gabrielle Boutin). (no document attached) (kxb) (Entered: 07/29/2022)
08/10/2022	48	NOTICE of Change of Address by Michael P Sousa (Sousa, Michael) QC Email: Attorney must update their new address in cm/ecf (anh). (Entered: 08/10/2022)
08/22/2022	49	AMENDED COMPLAINT <i>Second</i> against All Defendants, filed by San Diego County Gun Owners PAC, Firearms Policy Coalition, Inc., Cheryl Prince, Laura Schwartz, Robert Macomber, John Phillips, Lana Rae Renna, Clint Freeman, John Klier, Ryan Peterson, North County Shooting Center, Inc., Darin Prince, Second Amendment Foundation, Danielle Jaymes, Michael Schwartz, Justin Smith, Citizens Committee for the Right to Keep and Bear Arms, PWGG, L.P., Gunfighter Tactical, LLC.New Summons Requested. (DiGuiseppe, Raymond) (jpp). (Entered: 08/22/2022)

08/23/2022	50	Summons Issued. Counsel receiving this notice electronically should print this summons and serve it in accordance with Rule 4, Fed.R.Civ.P and LR 4.1. (jpp) (Entered: 08/23/2022)
08/26/2022	51	Joint MOTION for Extension of Time to File Response/Reply <i>Joint Motion for Extension of Time for Defendants to Respond to SAC and to File Answer</i> by Xavier Becerra, Robert Bonta. (Attachments: # 1 Declaration, # 2 Proof of Service)(Boutin, Gabrielle) (jpp). (Entered: 08/26/2022)
08/30/2022	52	ORDER granting 51 Joint Motion for extension of time. Signed by Chief District Judge Dana M. Sabraw on 8/30/2022. (jpp) (Entered: 08/31/2022)
09/08/2022	53	MOTION for Temporary Restraining Order , MOTION for Preliminary Injunction by Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith. (Attachments: # 1 Memo of Points and Authorities in Support of TRO & PI)(DiGuissepe, Raymond) (Entered: 09/08/2022)
09/16/2022	54	MOTION to Withdraw as Attorney of Record for Defendants by Robert Bonta, Luis Lopez. (Attachments: # 1 Declaration of Rita B. Bosworth, # 2 Declaration of Service) (Bosworth, Rita) (jpp). (Entered: 09/16/2022)
09/22/2022	55	Minute Entry for proceedings held before Magistrate Judge Daniel E. Butcher: The September 23, 2022 Status Conference is vacated. The Court will reset the Status Conference after Defendants file an Answer to the Second Amended Complaint (Dkt. No. 49) and the Hon. Dana M. Sabraw rules on Plaintiffs' Motion for Temporary Restraining Order (Dkt. No. 53).(no document attached) (kxb) (Entered: 09/22/2022)
09/23/2022	56	RESPONSE in Opposition re 53 MOTION for Temporary Restraining Order MOTION for Preliminary Injunction <i>Defendants' Opposition to Motion for Temporary Restraining Order and Preliminary Injunction</i> filed by Xavier Becerra, Robert Bonta. (Attachments: # 1 Declaration, # 2 Proof of Service)(Boutin, Gabrielle)(jpp). (Entered: 09/23/2022)
09/28/2022	57	Joint MOTION and Stipulation Regarding Plaintiffs' Claims Challenging Senate Bill 1327 by Xavier Becerra, Robert Bonta. (Boutin, Gabrielle) (Entered: 09/28/2022)
09/29/2022	58	MOTION for Extension of Time to File Response/Reply as to 56 Response in Opposition to Motion, <i>for TRO / MPI</i> by Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith. (DiGuissepe, Raymond) (jpp). (Entered: 09/29/2022)
09/30/2022	59	ORDER Granting 58 Extension for Reply to Defendants' Opposition to Motion for Temporary Restraining Order and Preliminary Injunction. The Court grants the motion and extends the deadline for the reply to October 4, 2022. Signed by Chief District Judge Dana M. Sabraw on 9/30/22. (dlg) (Entered: 09/30/2022)

09/30/2022	60	ORDER 57 on Joint Motion and Stipulation Regarding Plaintiffs' Claims Challenging Senate Bill 1327. Signed by Chief District Judge Dana M. Sabraw on 9/30/22. (dlg) (Entered: 09/30/2022)
10/03/2022	61	REPLY to Response to Motion re 53 MOTION for Temporary Restraining Order MOTION for Preliminary Injunction filed by Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith. (Attachments: # 1 Exhibit Declaration of Plaintiff Ruebe)(DiGuissepe, Raymond) (jpp). (Entered: 10/03/2022)
10/05/2022	62	MOTION <i>Notice of Motion, Motion, and Memorandum of Points and Authorities in Support of Motion to Dismiss</i> by Xavier Becerra, Robert Bonta. (Boutin, Gabrielle) (jpp). (Entered: 10/05/2022)
10/07/2022	64	Minute Entry for proceedings held before Chief District Judge Dana M. Sabraw: Motion Hearing held on 10/7/2022. Court to prepare order.(Court Reporter Vanessa Evans). (Plaintiff's Attorney Raymond DiGuissepe). (Defendant's Attorney Gabrielle Boutin). (no document attached) (bjb) (Entered: 10/11/2022)
10/08/2022	63	MOTION to Withdraw 53 MOTION for Temporary Restraining Order MOTION for Preliminary Injunction , MOTION for Temporary Restraining Order , MOTION for Preliminary Injunction by Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith. (Attachments: # 1 Exhibit Notice of TRO & MPI, # 2 Exhibit Memorandum of Supporting Points and Authorities, # 3 Exhibit Reply to Defendants' Opposition, # 4 Exhibit Declaration)(DiGuissepe, Raymond) (jpp). (Entered: 10/08/2022)
10/19/2022	65	Joint MOTION to Amend/Correct 49 Amended Complaint,, <i>to Dismiss Counts Two through Seven of the Second Amended Complaint, by the Filing of a Third Amended Complaint</i> by Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith. (DiGuissepe, Raymond) (alns). (Entered: 10/19/2022)
10/20/2022	66	ORDER denying 62 Motion Amend/Correct; granting 65 Motion to Amend/Correct. Plaintiffs shall file a Third Amended Complaint on or before October 31, 2022, pursuant to FRCP Rule 15 (a)(2), and Defendants response to the same shall be due on or before November 14, 2022.. Signed by Chief District Judge Dana M. Sabraw on 10/20/2022. (alns) (Entered: 10/20/2022)
10/31/2022	67	AMENDED COMPLAINT <i>Third</i> against All Defendants, filed by San Diego County Gun Owners PAC, Firearms Policy Coalition, Inc., Cheryl Prince, Laura Schwartz, John Phillips, Lana Rae Renna, John Klier, Ryan Peterson, North County Shooting Center, Inc., Darin Prince, Second Amendment Foundation, Danielle Jaymes, Michael Schwartz, Justin Smith, Citizens Committee for the Right to Keep and Bear Arms,

		PWGG, L.P., Gunfighter Tactical, LLC. (DiGuissepe, Raymond) (jpp). (Entered: 10/31/2022)
11/14/2022	68	<i>Answer to Third Amended Complaint</i> ANSWER to 67 Amended Complaint, by Robert Bonta.(Boutin, Gabrielle) (exs). (Entered: 11/14/2022)
12/05/2022	69	NOTICE OF FILING OF OFFICIAL TRANSCRIPT of Motion Hearing held on 10/07/2022, before Judge Dana M. Sabraw. Court Reporter/Transcriber Vanessa Evans. Transcript may be viewed at the court public terminal or purchased through the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER or the Court Reporter/Transcriber. If redaction is necessary, parties have seven calendar days from the file date of the Transcript to E-File the Notice of Intent to Request Redaction. The following deadlines would also apply if requesting redaction: Redaction Request Statement due to Court Reporter/Transcriber 12/27/2022. Redacted Transcript Deadline set for 1/5/2023. Release of Transcript Restriction set for 3/6/2023. (jpp) (Entered: 12/05/2022)
12/22/2022	70	NOTICE of Appearance by Bradley A. Benbrook on behalf of Richard Bailey, Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith, Hannah Spousta (Benbrook, Bradley)Attorney Bradley A. Benbrook added to party Richard Bailey(pty:pla), Attorney Bradley A. Benbrook added to party Citizens Committee for the Right to Keep and Bear Arms(pty:pla), Attorney Bradley A. Benbrook added to party Firearms Policy Coalition, Inc.(pty:pla), Attorney Bradley A. Benbrook added to party Clint Freeman(pty:pla), Attorney Bradley A. Benbrook added to party Gunfighter Tactical, LLC(pty:pla), Attorney Bradley A. Benbrook added to party Danielle Jaymes(pty:pla), Attorney Bradley A. Benbrook added to party John Klier(pty:pla), Attorney Bradley A. Benbrook added to party Robert Macomber(pty:pla), Attorney Bradley A. Benbrook added to party North County Shooting Center, Inc.(pty:pla), Attorney Bradley A. Benbrook added to party PWGG, L.P.(pty:pla), Attorney Bradley A. Benbrook added to party Ryan Peterson(pty:pla), Attorney Bradley A. Benbrook added to party John Phillips(pty:pla), Attorney Bradley A. Benbrook added to party Cheryl Prince(pty:pla), Attorney Bradley A. Benbrook added to party Darin Prince(pty:pla), Attorney Bradley A. Benbrook added to party Lana Rae Renna(pty:pla), Attorney Bradley A. Benbrook added to party San Diego County Gun Owners PAC(pty:pla), Attorney Bradley A. Benbrook added to party Laura Schwartz(pty:pla), Attorney Bradley A. Benbrook added to party Michael Schwartz(pty:pla), Attorney Bradley A. Benbrook added to party Second Amendment Foundation (pty:pla), Attorney Bradley A. Benbrook added to party Justin Smith(pty:pla), Attorney Bradley A. Benbrook added to party Hannah Spousta(pty:pla) (jpp). (Entered: 12/22/2022)
12/22/2022	71	MOTION for Preliminary Injunction <i>Or Alternatively, Motion for Summary Judgment</i> by Richard Bailey, Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith, Hannah Spousta. (Attachments: # 1 Memo of Points and Authorities Memorandum Of Points And Authorities In Support Of Motion For

		Preliminary Injunction Or Alternatively, Motion For Summary Judgment, # 2 Statement of Facts Separate Statement Of Undisputed Material Facts In Support Of Plaintiffs Motion For Preliminary Injunction Or Alternatively, Motion For Summary Judgment, # 3 Declaration Declaration of Brandon Combs, # 4 Declaration Declaration of Alan Gottlieb, # 5 Declaration Declaration of John Phillips, # 6 Declaration Declaration of Lana Rae Renna, # 7 Declaration Declaration of Michael Schwartz)(Benbrook, Bradley) (jpp). (Entered: 12/22/2022)
01/27/2023	72	RESPONSE in Opposition re 71 MOTION for Preliminary Injunction <i>Or Alternatively, Motion for Summary Judgment Defendants Application Pursuant to Fed. R. Civ. P 56(d)</i> filed by Robert Bonta. (Attachments: # 1 Supplement Objections to Plaintiffs' Evidence, # 2 Supplement Response to Separate Statement in Opposition to Plaintiffs' Motion, # 3 Declaration of Gabrielle Boutin in Support of Defendants' Application, # 4 Declaration of Salvador Gonzalez in Support of Defendants' Opposition, # 5 Declaration of Saul Cornell in Support of Defendants' Opposition, # 6 Proof of Service Certificate of Service)(Boutin, Gabrielle) (jpp). (Entered: 01/27/2023)
02/03/2023	73	MOTION for Leave to File Excess Pages <i>Unopposed Request for Leave to File Reply Brief in Excess of Ten Pages</i> by Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith. (Benbrook, Bradley) (jpp). (Entered: 02/03/2023)
02/03/2023	74	REPLY to Response to Motion re 71 MOTION for Preliminary Injunction <i>Or Alternatively, Motion for Summary Judgment</i> filed by Citizens Committee for the Right to Keep and Bear Arms, Firearms Policy Coalition, Inc., Clint Freeman, Gunfighter Tactical, LLC, Danielle Jaymes, John Klier, Robert Macomber, North County Shooting Center, Inc., PWGG, L.P., Ryan Peterson, John Phillips, Cheryl Prince, Darin Prince, Lana Rae Renna, San Diego County Gun Owners PAC, Laura Schwartz, Michael Schwartz, Second Amendment Foundation, Justin Smith. (Attachments: # 1 Statement of Facts Reply Separate Statement, # 2 Supplement Response to Defendants' Objections to Evidence, # 3 Supplement Objections to Evidence Submitted in Opposition) (Benbrook, Bradley) (jpp). (Entered: 02/03/2023)
02/03/2023	75	ORDER granting 73 Motion to file excess pages. Signed by Chief District Judge Dana M. Sabraw on 2/02/2023. (jpp) (Entered: 02/03/2023)
02/10/2023	76	Minute Entry for proceedings held before Chief District Judge Dana M. Sabraw: Motion Hearing held on 2/10/2023. Court to prepare order.(Court Reporter Lee Ann Pence). (Plaintiff's Attorney Bradley Benbrook). (Defendant's Attorney Gabrielle Boutin). (no document attached) (bjb) (Entered: 02/10/2023)
02/23/2023	77	NOTICE OF FILING OF OFFICIAL TRANSCRIPT of Motion Hearing held on 2/23/2023, before Judge Dana M. Sabraw. Court Reporter/Transcriber Lee Ann Pence. Transcript may be viewed at the court public terminal or purchased through the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER or the Court Reporter/Transcriber. If redaction is necessary, parties have seven calendar days from the file date of the Transcript to E-File the Notice of Intent to Request Redaction. The following deadlines would also apply if requesting redaction: Redaction Request Statement due to Court Reporter/Transcriber 3/16/2023. Redacted Transcript Deadline set for 3/27/2023.

		Release of Transcript Restriction set for 5/24/2023. (jpp) (Entered: 02/23/2023)
03/21/2023	78	ORDER setting Status Conference for 3/22/2023 at 2:30pm. Signed by Chief District Judge Dana M. Sabraw on 3/21/2023.(jpp) (Entered: 03/21/2023)
03/22/2023	79	Minute Entry for proceedings held before Chief District Judge Dana M. Sabraw: Status Conference held on 3/22/2023. Court to prepare order.(Court Reporter Lee Ann Pence). (Plaintiff's Attorney Bradley Benbrook and Defendant's Attorney Gabrielle Boutin appearing telephonically). (no document attached) (bjb) (Entered: 03/23/2023)
03/31/2023	80	ORDER granting in part and denying in part 71 Plaintiffs' Motion for Preliminary Injunction. Signed by Chief District Judge Dana M. Sabraw on 3/31/2023. (jpp) (Entered: 03/31/2023)
04/03/2023	81	Amended Order Granting in Part and Denying in Part Plaintiffs' 71 Motion for Preliminary Injunction. Signed by Chief District Judge Dana M. Sabraw on 4/3/2023.(exs) (Entered: 04/03/2023)
04/11/2023	82	Per ORDER 81 - Status Conference set for 4/14/2023 01:30 PM in Courtroom 13A before Chief District Judge Dana M. Sabraw.(no document attached) (jpp) (Entered: 04/11/2023)
04/13/2023	83	NOTICE of Change of Hearing: Status Conference is reset for 4/14/2023 10:30 AM in Courtroom 13A before Chief District Judge Dana M. Sabraw. (change in time)(no document attached) (bjb) (Entered: 04/13/2023)
04/14/2023	84	Minute Entry for proceedings held before Chief District Judge Dana M. Sabraw: Status Conference held on 4/14/2023. Court to prepare order.(Court Reporter Lee Ann Pence). (Plaintiffs' Attorney Bradley Benbrook and Raymond DiGuissepe). (Defense Attorney Gabrielle Boutin). (no document attached) (bjb) (Entered: 04/14/2023)
04/14/2023	85	ORDER following Status Conference. Signed by Chief District Judge Dana M. Sabraw on 4/14/2023.(jpp) (Entered: 04/14/2023)
04/14/2023	86	NOTICE <i>Notice of Preliminary Injunction Appeal</i> by Xavier Becerra, Robert Bonta (Boutin, Gabrielle) (jpp). (Entered: 04/14/2023)
04/14/2023	87	NOTICE OF APPEAL to the 9th Circuit as to 81 Order by Xavier Becerra, Robert Bonta. FILING FEE DUE (Notice of Appeal electronically transmitted to US Court of Appeals.) See 86 NOTICE of Preliminary Injunction Appeal filed using incorrect event. (smy1) Modified on 4/21/2023 to update docket text re fee due by State of CA agency. (jrd). (Entered: 04/19/2023)
04/20/2023	88	USCA Case Number 23-55367 for 87 Notice of Appeal to 9th Circuit, filed by Robert Bonta, Xavier Becerra. Briefing schedule will be set by future court order. (Attachments: # 1 Attention All Parties and Counsel, # 2 Case Opening Packet, # 3 Mediation Letter, # 4 Mediation Form)(smy1) (Entered: 04/20/2023)
04/21/2023	89	CLERK ORDER of USCA as to 87 Notice of Appeal to 9th Circuit, filed by Robert Bonta, Xavier Becerra. (Attachments: # 1 USCA IFP Instructions and Form)(smy1)(jrd) (Entered: 04/24/2023)

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Transaction Receipt

04/28/2023 11:21:54			
PACER Login:	gdboutin267308	Client Code:	
Description:	Docket Report	Search Criteria:	3:20-cv-02190-DMS-DEB
Billable Pages:	10	Cost:	1.00

CERTIFICATE OF SERVICE

Case Name: **Lana Rae Renna et al. v. Rob** No. **23-55367**
Bonta, et al.

I hereby certify that on May 12, 2023, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

EXCERPTS OF RECORD

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on May 12, 2023, at Sacramento, California.

Eileen A. Ennis

Declarant

/s/ Eileen A. Ennis

Signature