

SB0577_MHAMD_Fav.pdf

Uploaded by: Ann Geddes

Position: FAV

SB 577 – Public Safety – Distribution of Literature to Purchasers of Firearms and Ammunition

Senate Judicial Proceedings Committee

February 7, 2025

Position: SUPPORT

Mental Health Association of Maryland (MHAMD) is a nonprofit education and advocacy organization that brings together consumers, families, clinicians, advocates and concerned citizens for unified action in all aspects of mental health and substance use disorders (collectively referred to as behavioral health). We appreciate the opportunity to provide this testimony in support of SB 577.

SB 577 would require the Maryland Department of Health to prepare informational literature relating to firearms and ammunition, for distribution to purchasers of firearms and ammunition. The literature provided is to include information on a variety of topics, including firearm safety, suicide prevention and mental health awareness.

Suicide deaths by firearms have been increasing. The annual firearm suicide rate in the United States increased approximately 11% from 2019-2022 – the highest documented level since at least 1968.¹ Black, Indigenous, and Latinx populations have seen especially dramatic increases in suicide by firearm. While gun homicides are highlighted in the media, nearly 60% of gun deaths in the United States are suicides, not homicides.²

One part of this trend has been a dramatic increase in youth suicide over the last decade, often with the use of a firearm. Suicide deaths of 12-17-year-olds increased by 47.7% between 2011 and 2021,³ and data from 2020 shows that firearms were used in 48% of suicides of 15–19-year-olds, and 38% of suicides of 10–14-year-olds.⁴ In these instances, overwhelmingly youth used the firearm of a family member.⁵

¹ Kaczowski . et al. Notes from the field: firearm suicide rates by race and ethnicity – United States, 2019-2022. CDC. Morbidity and Mortality Weekly Report (December 2023).

<https://www.cdc.gov/mmwr/volumes/72/wr/mm7248a3.htm>

² Everytown Research analysis of Centers for Disease Control and Prevention, National Center for Health Statistics. WONDER Online Database, Provisional Mortality Statistics, Multiple Cause of Death. Average: 2019 to 2023.

<https://www.everytown.org/issues/gun-suicide/>

³ Heather Sanders and Nirmita Panchel. A look at the latest suicide data and change over the last decade. (August, 2023).

<https://www.kff.org/mental-health/issue-brief/a-look-at-the-latest-suicide-data-and-change-over-the-last-decade/>

⁴ Apurva Bhatt et.al. Rising rates of adolescent firearm suicide and the clinicians role in addressing firearms. American Academy of Child and Adolescent Psychiatry (June, 2024).

<https://pubmed.ncbi.nlm.nih.gov/36007812/>

⁵ Catherine Barber et.al. Who owned the gun in firearm suicides of men, women, and youth in five US states? Preventive Medicine (November 2022).

<https://pubmed.ncbi.nlm.nih.gov/35461957/>

For more information, please contact Ann Geddes at (443) 926-3396

Because of the strong correlation between suicide and access to a gun, any person who purchases a firearm should be provided with information about mental health resources. Especially critical is information about the 988 Suicide and Crisis Lifeline, which provides 24/7 support to people in suicidal crisis or emotional distress. Additionally, because of the risk of a youth accessing a family member's firearm, information on proper firearm storage, including Maryland's laws on firearm storage, must be included.

For these reasons, MHAMD supports SB 577 and urges a favorable report.

SB577_Lam_FAV.pdf

Uploaded by: Clarence Lam

Position: FAV

CLARENCE K. LAM, M.D., M.P.H.
Legislative District 12
Anne Arundel and Howard Counties



Miller Senate Office Building
11 Bladen Street, Room 420
Annapolis, Maryland 21401
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Finance Committee

Chair

Executive Nominations Committee

Joint Audit and Evaluation Committee

Joint Committee on Ending Homelessness

Joint Committee on Fair Practices and
State Personnel Oversight

Chair

Howard County Senate Delegation

Secretary

Asian-American & Pacific-Islander Caucus

THE SENATE OF MARYLAND

ANNAPOLIS, MARYLAND 21401

SB577 -- Public Safety – Distribution of Literature to Purchasers of Firearms and Ammunition

What the bill does

- MDH must create literature with information on firearm safety, training, suicide prevention, mental health awareness, and conflict resolution to be distributed to and displayed in firearm stores.
- Stores must make this literature visible and available at the point of purchase for firearms or ammunition.
- Penalties include a fine of \$500 or less for a first violation, and \$1,000 or less for subsequent offenses.
- A similar ordinance in Anne Arundel County was found to be constitutional by the 4th Circuit Court of Appeals.

Why this bill is needed

- This bill will ensure that firearm owners are connected with mental health resources and information should they need it.
- Gun ownership has been tied to higher suicide rates¹, so making this information available, especially at point of purchase, could provide someone with a lifeline at little cost to taxpayers.
- Providing literature on safety and training can also serve as a useful refresher for responsible gun owners, and prevent potentially deadly accidents.

¹ <https://med.stanford.edu/news/all-news/2020/06/handgun-ownership-associated-with-much-higher-suicide-risk.html>; <https://pmc.ncbi.nlm.nih.gov/articles/PMC4984734/>

SB 577_Literature for Purchasers of Firearms_BHSB_

Uploaded by: Dan Rabbitt

Position: FAV



February 7, 2025

**Senate Judicial Proceedings Committee
TESTIMONY IN SUPPORT**

SB 577 – Public Safety – Distribution of Literature to Purchasers of Firearms and Ammunition

Behavioral Health System Baltimore (BHSB) is a nonprofit organization that serves as the local behavioral health authority (LBHA) for Baltimore City. BHSB works to increase access to a full range of quality behavioral health (mental health and substance use) services and advocates for innovative approaches to prevention, early intervention, treatment and recovery for individuals, families, and communities. Baltimore City represents nearly 35 percent of the public behavioral health system in Maryland, serving over 100,000 people with mental illness and substance use disorders (collectively referred to as “behavioral health”) annually.

Behavioral Health System Baltimore strongly supports SB 577 – Public Safety - Distribution of Literature to Purchasers of Firearms and Ammunition. This bill would require establishments that sell firearms to distribute literature about gun safety, suicide prevention, and mental health awareness. This is a commonsense approach that could save lives at minimal cost for the state.

Death by suicide is a critical public health challenge and a leading cause of death in the United States. Nationally, almost 50,000 people died by suicide in 2022, and in Maryland, 608 people died. Suicide represents the third leading cause of death in the state for Marylanders aged 10-34.¹ This loss of life is terrible, especially considering that death by suicide can often be prevented with timely mental health interventions.

Firearms play a significant role in deaths by suicide. In Maryland, 44% of all suicide deaths involve firearms.² Providing basic information about suicide prevention and mental health to individuals purchasing firearms and ammunition can help to prevent such tragedies.

BHSB provides information about mental health and substance use resources through digital marketing, print, and through direct education at community events. We aim to raise awareness of the 988 Suicide & Crisis Lifeline and the role it can play in providing supportive counseling to someone in distress and in connecting people with ongoing resources in the community. We make these basic materials available throughout the community. Providing similar information to those purchasing a firearm, including information about 988, is just common sense. **We urge a favorable report on SB 577.**

For more information, please contact BHSB Policy Director Dan Rabbitt at 443-401-6142

References:

¹ American Foundation for Suicide Prevention. Suicide Data: Maryland. Last updated May 2024. Available at https://www.datocms-assets.com/12810/1725472388-maryland_2024-state-fact-sheet.pdf

² Ibid, May 2024.

2025 SB 0577 - Public Safety Distribution of Liter

Uploaded by: Ken Phelps Jr

Position: FAV



TESTIMONY IN SUPPORT OF SB 0577

**Public Safety - Distribution of Literature to Purchasers
of Firearms and Ammunition
Judicial Proceedings
FAVORABLE**

TO: Sen. William C. Smith, Chair; Sen. Jeff Waldstreicher, Vice-Chair; and the Members of the Senate Judicial Proceedings Committee

FROM: Rev. Kenneth Phelps, Jr., The Episcopal Diocese of Maryland

DATE: February 7, 2025

In 2022, the 80th General Convention of the Episcopal Church commended investment in evidence-based community violence intervention programs and strategies that address gun violence as a public health issue; called for the strengthening of anti-violence social norms; and ending the proliferation of guns in our society. Further, the Church called upon its dioceses, congregations and individual Episcopalians to advocate for funding and public policy to support community violence intervention programs and strategies that have been proven to reduce gun violence. In that spirit, I thank you for the opportunity to provide this testimony on behalf of the Diocese of Maryland.

This bill is a small step in the direction of freeing our nation from the plague of gun violence. But it is an important step and we will need to take many more before all of our communities are free from this constant and seemingly unstoppable threat. As Christians we are compelled by the non-violent teachings of Jesus, who taught that love was the way to combat fear and rivalry and warned that if we chose to live by violence (the sword, or in this case, the gun) that we would die by the same. This cycle has to end and education is one tool – and a powerful tool - that we can use to help turn our neighbors from this violent obsession.

The Diocese of Maryland requests a Favorable report

SB 0577 MSPA letter of support.pdf

Uploaded by: Laura Grubb

Position: FAV

Senator William C. Smith, Jr.
Senator Jeff Waldstreicher
Judicial Committee
2 East Miller Senate Office Building
Annapolis, Maryland 21401

Bill: SB 0577 – Public Safety - Distribution of Literature to Purchasers of Firearms and Ammunition

Dear Chair Smith, Vice Chair Waldstreicher, and Members of the Committee:

I am writing on behalf of the Maryland School Psychologists' Association (MSPA), a professional organization representing about 500 Maryland school psychologists. We advocate for the social-emotional, behavioral, and academic wellbeing of students and families across the state. School psychologists play a vital role in school communities.

According to a report released by the Johns Hopkins University Bloomberg Center (JOHN HOPKINS CENTER FOR GUN VIOLENCE SOLUTIONS, 2024), 2022 was the third year in a row that firearms were the leading cause of death for children and teens. Someone is killed by a gun every 11 minutes. *Seven children* under the age of 18 die from gunshots *every single day*. This is not only a public health crisis; it is a public education crisis. Students exposed to gun violence in the community “suffer serious negative mental health consequences, attend school less regularly, and perform worse on standardized tests”, (The White House, 2025).

Pamphlets are effective. Research shows pamphlets like these cause more than half of gun owners to say they want to store their guns safely (Hoops, Hernandez, Ziegfeld, Nasr, & Crifasi, 2021). Short of providing free and low-cost access to safe firearm storage, and enacting more stringent Child Access Prevention (CAP) laws, circulating information that leads to better safety awareness seems the least we can do to save lives.

This requirement is not unusual. Written documentation of safety hazards on hazardous materials is common. Cancer and poisoning *combined* kill fewer children than guns, yet warning labels are already required on tobacco and alcohol products, and toxic household substances.

For the above reasons, MSPA respectfully urges a favorable report on SB 0577. If we can provide any further information or be of any assistance, please contact us at legislative@mSPAonline.org or Sarah Peters at speters@hbstrategies.us or 410-322-2320.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Sarah Peters", followed by the letters "HPD".

Laura M. Grubb, PhD, BCBA-D, LBA

On behalf of the MSPA Legislative Committee

References:

Hoops KEM, Hernandez E, Ziegfeld S, Nasr I, Crifasi C. Evaluating the Use of a Pamphlet as an Educational Tool to Improve Safe Firearm Storage in the Home. *Clinical Pediatrics*. 2021;60(1):67-70. doi:[10.1177/0009922820961772](https://doi.org/10.1177/0009922820961772)

Johns Hopkins Center for Gun Violence Solutions. (2024). *Gun violence in the United States: The impact on public health and policy*. Johns Hopkins Bloomberg School of Public Health. <https://publichealth.jhu.edu/sites/default/files/2024-09/2022-cgvs-gun-violence-in-the-united-states.pdf>

The White House. (2025, January 15). *The cumulative costs of gun violence on students and schools*. The White House. <https://bidenwhitehouse.archives.gov/cea/written-materials/2025/01/15/the-cumulative-costs-of-gun-violence-on-students-and-schools/#:~:text=Gun%20Violence%20Out%20of%20School&text=Youth%20exposed%20to%20these%20senseless,perform%20worse%20on%20standardized%20tests.>

Testimony - Distribution of Literature - SB - .pdf

Uploaded by: Layla Greten

Position: FAV

Dear Chair Smith, Vice-Chair Waldstreicher, and other distinguished members of the Maryland Senate Judicial Proceedings Committee,

My name is Layla Greten and I am writing to voice my support for bill SB 577, Distribution of Literature to Purchasers of Firearms and Ammunition. I am the founder of a local Team ENOUGH chapter, a youth-led initiative dedicated to gun violence prevention.

Furthermore, I am aware of the impact of gun violence in my community. Too many lives are taken daily because of improper firearm usage or storage. There is a significant lack of awareness about safe firearm practices among gun owners, creating an environment that increases the risk of accidental shootings, unauthorized access, and preventable tragedies.

In a study conducted by Hopkins, it was found that only 46% of firearm users actually store their firearms according to safe storage guidelines. While some of this can be attributed to ignorance, much of it can also be a result of lack of education.

The bill would ensure that all sellers and buyers would be aware of the safety laws and guidelines. All firearm distributors would provide a packet, created by The Department of Health, to buyers of firearms. Included in the packet would be information regarding firearm safety and training, mental health awareness, suicide prevention, and conflict resolution. This can ensure that accidental and unintentional shootings are avoided. Not only will this bill allow for more education about safe storage and usage, but it has the capacity to save lives.

A family friend who owned firearms lost their high school-aged child due to unsafe firearm storage many years ago. If there is more education regarding safe storage in the future, situations like this can be avoided. This legislation has the power to prevent further such tragedies.

I strongly urge a favorable report for SB 577.

Thank you for your time and consideration on this urgent matter.

Signed,

Layla Greten

Founder Team ENOUGH Baltimore

Mateo's Law.pdf

Uploaded by: Rosalynn Gaskins

Position: FAV

Dr. Rosalynn Gaskins
12407 Newcastle Farm Way
Upper Marlboro, MD 20772
240-432-3686

February 3, 2025

RE: Senate Bill 565 – Mateo’s Law

To Whom It May Concern,

My name is Dr. Rosalynn Gaskins, and I am writing to express my strong support for Senate Bill 565, Motor Vehicles – Accidents – Required Testing for Impaired Driving (Mateo’s Law). As a dedicated high school administrator, a mother, wife and a committed community advocate, I have witnessed firsthand the devastating impact that reckless and impaired driving has on families, students, and our communities.

I have been a close family friend of Mateo Green and have known him through our shared involvement in Scouting. Mateo and my son both achieved the rank of Eagle Scout, a distinction that speaks to their leadership, integrity, and service to others. Mateo’s tragic and untimely passing due to a vehicle accident involving an impaired driver was a heartbreaking loss—not only for his family but for all who knew and loved him.

As an educator, I work every day to guide young people and ensure their safety. It is deeply troubling that under current Maryland law, testing for impairment is not mandatory in accidents involving serious injury or fatalities. With over 500 traffic-related fatalities and 40,000 reported injuries annually in Maryland, this gap in the law undermines justice and accountability. Senate Bill 565 provides a necessary and effective solution by ensuring that individuals involved in such accidents are required to submit to testing, closing a critical loophole in our legal system.

For these reasons, I strongly support Senate Bill 565 and urge all legislators to vote in favor of this bill. It is a necessary step toward making our roads safer, ensuring accountability, and honoring the memory of those we have lost—like Mateo Green.

Sincerely,


Dr. Rosalynn Gaskins

CMIT North High School Administrator | Former Troop 81 Committee Member

rosalynn.gaskins@gmail.com

Anne Arundel County _FAV_SB577.pdf

Uploaded by: Steuart Pittman

Position: FAV



February 7, 2025

Senate Bill 577

Public Safety - Distribution of Literature to Purchasers of Firearms and Ammunition

Senate Judicial Proceedings Committee

Position: FAVORABLE

Anne Arundel County **SUPPORTS** Senate Bill 577 – Public Safety - Distribution of Literature to Purchasers of Firearms and Ammunition. This legislation would require local health departments to distribute literature prepared by the Maryland Department of Health in establishments that sell firearms or ammunition.

In 2021, the Anne Arundel County Council passed County Bill 108-21 requiring gun retailers to distribute suicide prevention and conflict resolution pamphlets to customers. This law arose from the work of our Gun Violence Prevention Task Force in an effort to place life-saving information in the hands of those who need it most in order to curb gun-related deaths and suicides through education and targeted interventions.

Although Bill 108-21 was challenged by Maryland Shall Issue, Inc. and four local gun shops, all courts that examined the law have agreed that the law is both constitutional and essential. On October 8, 2024, the United States Supreme Court denied the Petition for Writ of Certiorari filed by challengers, putting to rest efforts to invalidate the law.

Senate Bill 577 is a safety-focused and common-sense gun law. Providing this information is a good business practice that will improve the safety of gun retail customers and our communities. For all of these reasons, I respectfully request a **FAVORABLE** report on Senate Bill 577.

Steuart Pittman
County Executive

McNamara Testimony in Support of SB 577.pdf

Uploaded by: Jacqueline McNamara

Position: FWA

Testimony in Support of
SB 577 – Public Safety –
Distribution of Literature to Purchasers of Firearms and Ammunition
With Amendment

Judicial Proceedings Committee
February 7, 2025

Jacqueline McNamara, Howard County, MD

I am a 35-plus-year Maryland resident, a member of the Maryland Bar, and a volunteer with gun violence prevention (GVP) organizations such as Moms Demand Action since 2015. I am submitting this testimony as a constituent.

I support SB 577 and believe it will be a critical complement to Maryland's strong GVP laws. County health departments in Maryland have traditionally been called upon to provide important public health literature and services, such as opioid overdose awareness and prevention. Requiring county health departments to include information on gun violence safety, training, and prevention; suicide prevention; and conflict resolution is a similar function.

The amendment I would offer is to remove the requirement that a representative of the county health department be authorized to issue citations to persons who violate the bill's terms. This goes beyond the scope of a health dept employee's job and sets up the possibility of unnecessary conflict between them and firearm sellers/purchasers.

Thank you for your consideration.

Jacqueline McNamara

MD SB 577 2025 Letter.pdf

Uploaded by: Christopher Kopacki

Position: UNF

February 7, 2025

The Honorable William C. Smith Jr.
Chair, Senate Judicial Proceedings Committee
Miller Senate Office Building
Annapolis, Maryland 21401

Re: Senate Bill 577 – Public Safety – Distribution of Literature to Purchasers of Firearms and Ammunition

Dear Chair Smith, Vice Chair Waldstreicher, and Members of the Judicial Proceedings Committee:

On behalf of the National Shooting Sports Foundation (NSSF), America's trade association for hunting and recreational shooting sports, I write to express our strong opposition to Senate Bill 577 ("SB 577"). This bill imposes unnecessary and duplicative requirements on federally licensed firearm and ammunition retailers without providing any demonstrable public safety benefit.

Background on NSSF and Industry Safety Initiatives

The National Shooting Sports Foundation, along with our industry members, actively supports voluntary programs such as the NSSF's Project ChildSafe[®], Operation Secure Store[®], Don't Lie for the Other Guy[™], and FixNICS[®]. These programs provide millions of free gun locks, along with safety and education materials to promote responsible firearm ownership.

Opposition to SB 577

SB 577 is both unnecessary and burdensome to law-abiding businesses for several reasons:

1. Duplicative and Redundant Regulations
 - Federal and state laws already mandate extensive background checks, safety training, and waiting periods for firearm purchasers.
 - Licensed firearms dealers already provide comprehensive firearm safety materials at the point of sale, making additional state-mandated literature redundant and ineffective.
2. Unjustified Burden on Small Businesses
 - SB 577 imposes new compliance requirements on licensed firearm dealers and ammunition sellers, many of which are small businesses.
 - The bill fails to allocate funding to cover the costs of distributing, storing, and tracking these materials, placing financial and administrative strain on retailers.

3. Unenforceable and Vague Language
 - The bill grants county health departments the authority to issue citations but does not provide clear enforcement guidelines or define what constitutes compliance.
 - This opens the door to arbitrary enforcement and inconsistent penalties across different counties.
4. No Measurable Impact on Public Safety
 - There is no evidence that requiring retailers to distribute additional pamphlets will reduce firearm-related accidents, suicides, or crime.
 - Resources would be better spent on supporting proven firearm safety programs, such as those listed above.

Conclusion

SB 577 creates unnecessary regulatory burdens for law-abiding businesses, duplicates existing efforts, and lacks measurable public safety benefits. Rather than imposing additional mandates on responsible retailers, Maryland should focus on supporting voluntary firearm safety initiatives that have a proven track record of success.

Sincerely,

Christopher G. Kopacki, Ph.D.

SB0577_Testimony_2A_Maryland.pdf

Uploaded by: John Josselyn

Position: UNF



Senate Bill 577

Public Safety-Distribution of Literature to Purchasers of Firearms & Ammunition UNFAVORABLE

This bill would impose a perpetual unfunded mandate upon the health department of 23 Maryland counties and Baltimore City. These jurisdictions have neither the budget nor the personnel to implement and administer the obligations placed upon them.

The Bureau of Alcohol Tobacco and Firearms (ATF) lists no fewer than 760 federal firearms licensees (FFL) in Maryland (data attached). It will fall upon the individual health departments to discern which FFL holders are selling firearms and which are not.

How the health departments will monitor the stores and enforce the mandates is unknown. The challenge facing the health departments is further increased because an FFL is not required to sell ammunition. These same health departments will now be required to visit every convenience store, “Mom and Pop” grocery and hardware store in their respective jurisdictions to determine which stores are selling ammunition.

SB 577 authorizes the local health department to issue citations for non-compliance and unilaterally impose fines. No provisions for “due process” are contained in the bill.

2A Maryland contacted local health departments and was told the departments were aware of the bills, but they lacked the resources to implement the provisions. Should SB 577 or HB 713 or become law, they would be compelled to seek funding from the State.

We urge an unfavorable report on Senate Bill 577.

Respectfully,

John H. Josselyn

2A Maryland

02/07/2025

Attachment (1)

Federal Firearms Licensees

Source: ATF Website <https://www.atf.gov/firearms/listing-federal-firearms-licensees>

LICENSE_NAME	BUSINESS_NAME	PREMISE_STREET	PREMISE_CITY	PREMISE_STATE	PREMISE_ZIP_CODE
10 X FIREARMS LLC		4417 CASSELL BLVD	PRINCE FREDERICK	MD	20678
2 A SALES & SUPPLIES LLC	2 A SALES & SUPPLIES	8610 BALTIMORE WASHINGTON BLVD SUITE 209	JESSUP	MD	20794
20 PACES INDUSTRIES LLC	DIRTY BARRELS ARMORY	211 THOMAS JEFFERSON TERRACE	ELKTON	MD	21921
24K DEFENSE LLC		2302 ROCK HILL CT	STREET	MD	21154
2A GUNS & AMMO LLC	2A GUNS & AMMO	1202 EAST PATRICK STREET	FREDERICK	MD	21701
34 STRATEGIC LLC	34 TACTICAL	208 THOMPSON LN	DEALE	MD	20751
410 FIREARMS LLC		306 MAIN ST	BETTERTON	MD	21610
A & E ENTERPRISES LLC	PITBULL FIREARMS	308 CENTREVILLE RD	QUEENSTOWN	MD	21658
ACADEMY TRAINING CENTER LLC		6101 FALLARD DR	UPPER MARLBORO	MD	20772
ACADEMY LTD	ACADEMY SPORTS + OUTDOORS #373	1580 WESEL BLVD, SUITE C	HAGERSTOWN	MD	21740
ACCURATE GUNS AND AMMO LLC		28650 POINT LOOKOUT RD	LEONARDTOWN	MD	20650
ACEI HOLDINGS LLC	UNITED GUN SHOP	5465 RANDOLPH ROAD SUITE A	ROCKVILLE	MD	20852
ACM ARMS LLC		826 GUILFORD AVE	BALTIMORE	MD	21202
AFFORDABLE FIREARMS TRANSFER, LLC		2710 MOUNTAIN ROAD, SUITE 203	PASADENA	MD	21122
ALBRIGHT SPORTS LTD	ALBRIGHT'S GUN SHOP	36 E DOVER ST	EASTON	MD	21601
ALEX COOPER AUCTIONEERS INC		908 YORK RD	BALTIMORE	MD	212040000
ALLEN & MARSHALL AUCTIONEERS AND APPRAISERS LLC		8000 ESHAM RD	PARSONSBURG	MD	21849
ALSTON-VINCE GUN SHOPS INC	THE GUN SHOP	1614 EASTERN BLVD	BALTIMORE	MD	212210000
AM CIRCLE INC	AM SHOOTING	26121 RIDGE RD	DAMASCUS	MD	20872
AMERICA HERITAGE INVESTMENT LLC	AMERICA GUNS	8935 SHADY GROVE CT	GAITHERSBURG	MD	20877
ANGLERS SPORT CENTER LTD		1456 WHITEHALL RD	ANNAPOLIS	MD	21409
ANNIEGETURGUN, INC		21 INDUSTRIAL PARK DR STE 201E	WALDORF	MD	20602
APT APPLICATIONS, LLC		6169 SEA LION PLACE	WALDORF	MD	20603
ARMY & AIR FORCE EXCHANGE SERVICE	FORT MEADE EXCHANGE	2799 ROSE ST	FT MEADE	MD	20755
ARMY AND AIR FORCE EXCHANGE SERVICE	JOINT BASE ANDREWS EXCHANGE	BLDG 1811 G ST	ANDREWS AFB	MD	20762
ARTHUR, ROBERT SHERMAN	ARTHUR'S SHOOTERS SUPPLY	9234 OLD OCEAN CITY ROAD	BERLIN	MD	21811
ATKINSON, HOLMES RICARDO	RICKS GUN SHOP	12301 MCMULLAN HWY SW	CUMBERLAND	MD	215020000
ATLANTIC FIREARMS LLC		10337 BUNTING ROAD	BISHOPVILLE	MD	21813
ATLANTIC GUNS INC		15813 FREDERICK RD	ROCKVILLE	MD	20855
ATLANTIC HURRICANE INC		820 STAGWELL RD	QUEENSTOWN	MD	21658
ATTERBURY, HENRY S III	HS ATTEBURY SPECIAL EFFECTS	2209 KEYSVILLE-FREDERICK CO RD	KEYMAR	MD	21757
B&C GUNS LLC		2606 LIMEKILN RD	SHARPSBURG	MD	21762
BACKWOODS GUNS AND AMMO LLC		40050 STILLWATER LN	LEONARDTOWN	MD	20650
BADGERSMITH GUNWORKS INC		1002 WAKELY CIRCLE	BEL AIR	MD	21014
BALLISTIC OUTDOOR SUPPLY INC		3152 BALTIMORE BLVD SUITE L	FINKSBURG	MD	21048
BARBACANE, JOSEPH D		4916 HARFORD CREAMERY RD	WHITE HALL	MD	211619696
BARBER GUN EXCHANGE LLC		29 APPLES CHURCH RD	THURMONT	MD	21788
BARNETT, RALPH ANTHONY	R & D SYSTEMS	9167 PREFERENCE DRIVE	LA PLATA	MD	20646
BARREN CREEK ARMS LLC		24740 PORTER MILL ROAD	HEBRON	MD	21830
BART BROTHERS LLC	BARTS SPORTS WORLD	8143 MARTIN LANE	DENTON	MD	21629
BASS PRO OUTDOOR WORLD, LLC	BASS PRO SHOPS OUTDOOR WORLD #012	7000 ARUNDEL MILLS CIRCLE	HANOVER	MD	21076
BATLEMAN, WILLIAM JAY	POTOMAC ARMS DISTRIBUTING	11602 PLEASANT MEADOW DR	NORTH POTOMAC	MD	208780000
BAY ACE HARDWARE INC	ACE HARDWARE	23 WEST MAIN ST	RISEING SUN	MD	21911
BAY AREA FIREARMS LLC	BAY AREA FIREARMS	8909 CHESAPEAKE AVE	NORTH BEACH	MD	20714
BDS GUNS & AMMO LLC		2711 ACCOKEEK RD	WALDORF	MD	20601
BEAN, RICHARD LEO JR	BRIGHTON'S GUNS	200 ISLAND PLAZA COURT	STEVENSVILLE	MD	21666
BECK, TIMOTHY ADAM	ALLEGIANIT REBEL ARMORY	15 SANDS CT	CONOWINGO	MD	21918
BETTLER, SAMUEL CONRAD JR	RIP GUNS & ACCESSORIES	17711 BLUEBELL DR	HAGERSTOWN	MD	217400000
BEL AIR GUN RANGE INC		2137 NORTH FOUNTAIN GREEN ROAD	BEL AIR	MD	21015
BERGERE, PAUL J		2196 QUAIL RUN	TRAPPE	MD	216730000
BEST PROP LLC	EMINENT ARMS	7913 OXFARM COURT	BOWIE	MD	20715
BIG DOG'S GUNS & SUPPLIES LLC		3503 HOOPER RD	NEW WINDSOR	MD	21776
BIXLER, THOMAS S JR		5011 REED ROAD	OXFORD	MD	21654
BLACK ANCHOR TATTOO LLC	BLACK ANCHOR ARMORY	211 MARKET STREET	DENTON	MD	21629
BLACK BEAR GUNS LLC		1322 THE TERRACE	HAGERSTOWN	MD	21742
BLACK SMOKE TACTICAL LLC	BLACK SMOKE TACTICAL	815 OLD WESTMINSTER PIKE	WESTMINSTER	MD	21157
BLACKSON, BRANDON AND PRESCOTT, JUSTYN	B AND B DEFENSE	6219 KOLB ST	CAPITOL HEIGHTS	MD	20743

2A Maryland

Federal Firearms Licensees

Source: ATF Website <https://www.atf.gov/firearms/listing-federal-firearms-licensees>

LICENSE NAME	BUSINESS NAME	PREMISE STREET	PREMISE CITY	PREMISE STATE	PREMISE ZIP CODE
BLADES ENTERPRISES, INC	SAFE & SECURE ENTERPRISES, INC	8615 COMMERCE DR STE 2 2ND FLOOR OFFICE	EASTON	MD	21601
BLADES ENTERPRISES, INC	SAFE AND SECURE ENTERPRISES, INC	10503 COUNCELL ROAD	CORDOVA	MD	21625
BLAIR, WILLIAM C	BILL'S GUNS	7704 MAPLEVILLE RD	BOONSBORO	MD	21713
BLAIR, WILLIAM C	DOWNSVILLE GENERAL STORE	8638 DOWNSVILLE PIKE	WILLIAMSPORT	MD	21795
BLAIR, WILLIAM CECIL	DOWNSVILLE GENERAL STORE	7704 MAPLEVILLE RD	BOONSBORO	MD	21713
BLAIR, WILLIAM CECIL	DOWNSVILLE GENERAL STORE	8638 DOWNSVILLE PIKE	WILLIAMSPORT	MD	21795
BMADDOX ENTERPRISES LLC	SILENCER CENTRAL	1745 FOREST GLEN DRIVE	PRINCE FREDERICK	MD	206784514
BOB'S SUNOCO LLC		20321 PINEY POINT ROAD	CALLAWAY	MD	20620
BOGLEY, JOHN JACOB		20166 BENEVOLA CHURCH ROAD	BOONSBORO	MD	21713
BOLLINGER GUNSMITHING & SALES LLC		19 WEST BALTIMORE ST	TANETOWN	MD	21787
BOOM BOOM FIREARMS LLC	BOOM BOOM FIREARMS FFL	9701 APOLLO DRIVE SUITE 410-1	UPPER MARLBORO	MD	207744790
BORNEMAN, RICHARD STANLEY	STAN'S SERVICE COMPANY	802 MARYLAND AVE	HAVRE DE GRACE	MD	21078
BOSWELL, STEVEN PAGE		12035 OREBANK RD	CLEAR SPRING	MD	21722
BOURQUE, MICHAEL THOMAS	MTB GUNWORKS	625 STILLWATER LN	PRINCE FREDERICK	MD	20678
BOZMAN, ROY LEE	BOZMAN'S REPAIR	31296 NASSAWANGO CHURCH RD	SALISBURY	MD	21804
BRADFORD, CHARLES EDWARD	BRADFORDS GUN REPAIR	5609 THOMPSONTOWN RD	EAST NEW MARKET	MD	21631
BRADLEY TECHNOLOGIES INCORPORATED	BTI SECURITY	1700 ROCKVILLE PIKE SUITE 200	ROCKVILLE	MD	20852
BRAKE, EARL JEROME SR	EJB'S GUNSHOP	7943 CENTRAL AVE	CAPITOL HEIGHTS	MD	20743
BRANCH & WATER GROUP LLC	POSEIDON COMPREHENSIVE	8501 PLUM CREEK DRIVE	GAITHERSBURG	MD	20882
BRINKER, RANDAL BERNARD	BRINKER SUPPLY	12637 SUNSET AVE. SUITE 6	OCEAN CITY	MD	21842
BRINKLEY, JOHN MICHAEL	BROADNECK FIREARMS	14201 CANDY HILL RD	UPPER MARLBORO	MD	20772
BROADNECK FIREARMS LLC		8057 VETERANS HWY	MILLERSVILLE	MD	21108
BROMLEY, JOHN W IV	C & L ARMS	32385 WEST POST OFFICE RD	PRINCESS ANNE	MD	21853
BROWN, BRIAN DALLAS AND BROWN, KATIE NICOLE	BROWN DEFENSE	6128 AMERICAN CORNER ROAD	DENTON	MD	21629
BROWN, JACK SUNVILLE	2ND GENERATION FIREARMS	7735 FAIRPLAY RD	BOONSBORO	MD	21713
BROWN, PERRY W	BLUE HERON JUNCTION	28354 CRISFIELD MARION HWY	MARION STATION	MD	21838
BRUNSWICK VOLUNTEER FIRE CO INC		1500 VOLUNTEER DRIVE	BRUNSWICK	MD	21716
BUCK, KEVIN DION		6334 AYRSHIRE DR	SALISBURY	MD	21801
BUGDEN, DAVID M	DMB TRADERS	11259B LOCKWOOD DR	SILVER SPRING	MD	209010000
BUMGARDNER, DALLAS WAYNE JR	DALLAS WAYNES	6933 WILLIAMSBURG CHURCH RD	HURLOCK	MD	21643
BURANEN, DOUGLAS WALTER	THE ATLAS ARMORY	3408 N FURNACE RD	JARRETTSVILLE	MD	21084
BURNING SPEAR LLC		13005 WOODMORE N BLVD	BOWIE	MD	20720
BV INSURANCE GROUP LLC		10221 SOUTH DOLFIELD RD	OWINGS MILLS	MD	21117
BYOB, LLC	BE YOUR OWN BODYGUARD	1420 FLORENCE ROAD	MOUNT AIRY	MD	21771
C & M GUNS, LLC		2055 TYRONE ROAD	WESTMINSTER	MD	21158
CALLOWAY, GEORGE ALAN	G A CALLOWAY ENTERPRISES	6416 POWELLVILLE RD	WILLARDS	MD	21874
CARRY ARMS 1 LLC		4925 TURTLE CREEK COURT	WALDORF	MD	20601
CARTER, DAVID		23700 POCAHONTAS DR	GAITHERSBURG	MD	20882
CATOCTIN OUTFITTERS LLC		9225 BALTIMORE NATIONAL PIKE	MIDDLETOWN	MD	21769
CECIL FIREARMS LLC		223 HIGHLAND DRIVE	ELKTON	MD	21921
CEKOVICH, RONALD LEE	3 R GUN SHOP	13255 HERMAN MYERS RD	HAGERSTOWN	MD	21742
CERTIFIED SHOOTERS LLC	CERTIFIED SHOOTERS MD	8217 SEVEN PINES LN	WALDORF	MD	20603
CHAMBERS FIREARMS, LLC		100 BROOKVIEW LOOP	ELKTON	MD	21921
CHATHAM, GARY FLOYD		28079 RIVERSIDE DR EXT D	SALISBURY	MD	218010000
CHESAPEAKE ARMS, LLC		32841 CYPRESS ROAD	MILLINGTON	MD	21651
CHESAPEAKE GUNS/SLINGERS LLC		1105 GRIST CT	FALLSTON	MD	21047
CHESAPEAKE OUTDOORS, INC		1707 MAIN ST	CHESTER	MD	216190000
CHURCH ROAD HARDWARE INC		4116 CHURCH RD	MILLERS	MD	211020000
CINDY'S HOT SHOTS, INC	CINDY'S HOT SHOTS	2618 ANNAPOLIS RD	SEVERN	MD	21144
CLEARWATER, GARY R	CLEARWATER CUSTOM RIFLES	115-C HOLSUM WAY	GLEN BURNIE	MD	21060
CLYDES SPORT SHOP INC		3156 PHEASANT RUN	IJAMSVILLE	MD	21754
CM SWEITZER ENGRAVER LLC		2307 HAMMONDS FERRY RD	BALTIMORE	MD	212270000
COBALT RESEARCH, LLC		17700 WASHINGTON GROVE LN	GAITHERSBURG	MD	20877
COLEMAN, FRANCIS WILLIE	PWC ENTERPRISE	7308 SILENT BIRD CT	COLUMBIA	MD	21046
COLLINS, LARRY KENVATTIA II	BGD ARMS	10607 BROADLEAF DRIVE	LARGO	MD	20774
CONSERVATION & SPORTSMEN'S CLUB OF THURMONT MD INC		2628 PEBBLEBROOK TERRACE COURT	WALDORF	MD	20603
		11617 HUNT CLUB RD	THURMONT	MD	21788

Federal Firearms Licensees

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LICENSE_NAME	BUSINESS_NAME	PREMISE_STREET	PREMISE_CITY	PREMISE_STATE	PREMISE_ZIP_CODE
CONWAY, PETER		3100 BEAVER LANE	TRAPPE	MD	21673
COWGER ENTERTAINMENT GROUP LLC	COWGER FIREARMS	828 WHITE OAKS LANE	POCOMOKE CITY	MD	21851
COX, ERNEST	SELECT ARMS	4415 JONES RD	POCOMOKE CITY	MD	21851
CROWWELL, NICKOLAS JAY	CROWWELL'S FIREARMS	21591 HARRISON ST	GREAT MILLS	MD	20634
CROOKS, CHARLES ERNEST	CHUCKAROO'S LASER ENGRAVING	3147 PHEASANT RUN	JIAMSVILLE	MD	21754
CROOM, CURTIS EUGENE & SNIDER, MARTIN EARNEST	COOTER'S CLASSIC FIREARMS	102 INDUSTRY LN	FOREST HILL	MD	21050
CROUSE, GARY L	BENCHTOP GUNSMITHING	41 NAYLOR BLUE CT	PORT DEPOSIT	MD	21904
CUMBERLAND OUTDOOR CLUB INC		31 THOMAS ST	CUMBERLAND	MD	21502
CUMBERLAND, LAURENCE W B	PATUXENT GUNS	481 MAIN ST	PRINCE FREDERICK	MD	206780000
CUSTOM SECURITY INC		13904 WANEGARDEN DR	GERMANTOWN	MD	20874
D & B SPORT SHOP LLC		832 EDGEWOOD DR	OAKLAND	MD	21550
D AND J ENTERPRISES, LLC	CHESAPEAKE SHOOTING CENTER	919 WELLS AVE	ANNAPOLIS	MD	21403
DADY, PAT		15215 SHADY GROVE RD # 102	ROCKVILLE	MD	20850
DAMAZO, HERBERT LANE	LGS	4936 BURKITTSVILLE RD	KNOXVILLE	MD	217580000
DANIEL FAM PRODUCTIONS LLC		810 ERMINE CT	EDGEWOOD	MD	21040
DCS LLC	MAD FIREARMS	26005 MURPHY LANE	MECHANICSVILLE	MD	20659
DEEP CREEK ARMS, LLC	DEEP CREEK ARMS, LLC	25203 GARRETT HIGHWAY, SUITE 4	MC HENRY	MD	21541
DEFENDER ONE LLC	DEFENDER ONE SECURITY	400 RED BROOK BLVD, SUITE 200	OWINGS MILLS	MD	21117
DEMATTIA, PHILIP DAMIAN		11671 FAIRMONT PLACE	JIAMSVILLE	MD	21754
DEVIL DOG LASER ENGRAVING LLC		45274 KEYPORT CT	CALIFORNIA	MD	20619
DG SOLUTIONS, LLC	DG PRECISION FIREARMS	1431 ABBEY LANE	HUNTINGTOWN	MD	20639
DIVERSIFIED SOLUTIONS LLC		746 LAKE VARUNA MEWS	GAITHERSBURG	MD	20878
DMB BALLISTICS, LLC		1301 BRIARCLIFF PL	BEL AIR	MD	21014
DMC ARCHERY LLC	AUTUMN SKY OUTFITTERS	3404 CONOWINGO RD	STREET	MD	21154
DONOVAN SMALL ARMS, LLC		3911 RED LEAF CT	POINT OF ROCKS	MD	21777
DOWELL, BRYAN K		140 DALRYMPLE RD	SUNDERLAND	MD	20689
DUKE'S GUN SHOP & GUN DOGS, LLC		505 SOUTH BEND CT	WESTMINSTER	MD	21157
DUNHAM'S ATHLEISURE CORPORATION		1313 NATIONAL HWY, LAVALE PLAZA SHOPPING CTR	LAVALE	MD	215027610
DUNHAM'S CLASSIC GUN COLLECTION LLC	DUNHAM'S SPORTS #9027	21034 HERMANVILLE RD	LEXINGTON PARK	MD	20653
DUTTON, JOSEPH PAUL		10611 BETHEL RD	FREDERICK	MD	21702
DYE, MICHAEL ALLEN	MAD FIREARMS	26005 MURPHY LANE	MECHANICSVILLE	MD	20659
DYNAMIC DEVIANCE LLC	DYNAMIC WEAPONRY	22216 PEEWEE LANE	LEONARDTOWN	MD	20650
E S HUBBERTS & SON INC		403 SUNBURST HIGHWAY	CAMBRIDGE	MD	21613
EAGLE FIREARMS LLC	EAGLE FIREARMS	125 KENT OAKS WAY	GAITHERSBURG	MD	20878
EAGLE TACTICAL LLC		4636 OCEAN GATEWAY	VIENNA	MD	21869
EARLY OUT ENTERPRISES LLC	DISCOUNT SPORTS	101 WEST ELIZABETH ST	WOODSBORO	MD	21798
EAST COAST TACTICAL LLC		8430 FREYMAN DR	CHEVY CHASE	MD	20815
EASTERN SHORE ARMS AND AMMO, LLC		380 HURTT AVE	MILLINGTON	MD	21651
EDWARDS, RAYMOND CHARLES III	WSTCO / WESTERN SHORE TRADING COMPANY	1537 HICKORY WOOD DR	ANNAPOLIS	MD	21409
ELDERSBURG ARMORY LLC		6623 MONROE AVE	SYKESVILLE	MD	21784
ELK RIVER FIREARMS LLC		199 DEAVER ROAD	ELKTON	MD	21921
ELLIOTT, ROBERT EDWARD		4826 ILCHESTER ROAD	ELICOTT CITY	MD	21043
ELTISTE STAMP ACQUISITIONS, LLC	CAPITOL ARMORY	3900 CHESAPEAKE BEACH RD	CHESAPEAKE BEACH	MD	207320000
ELTS CONSULTING LLC	PANDA TACTICAL	13708 NATIONAL PIKE, STE 1	CLEAR SPRING	MD	21722
ENGLISH, PHILLIP JOSHUA	CRANE FIREARM REPAIR	48372 SUNBURST DR	LEXINGTON PARK	MD	20653
ENNIS, DEAN ALLEN		2001 RUTHSBURG RD	QUEEN ANNE	MD	21657
EUBANKS CONSULTING LLC		1601 MARKET ST	POCOMOKE CITY	MD	218510000
EVELAND ARMS, LLC		3663 SHINER CT	WALDORF	MD	20603
EVELAND ARMS, LLC		148 PEDDLERS LANE	EARLEVILLE	MD	21919
EZ-HQ! FIREARMS TRAINING CENTER LLC		2017 DUDLEY CORNERS RD	CRUMPTON	MD	21628
F/S FIREARMS, LLC		9660 BEL AIR RD SUITE 200	NOTTINGHAM	MD	21236
FARRIS, PETER D		114 JIMSTOWN CIRCLE	CHESTERTOWN	MD	21620
FERNANDEZ, CARLOS MANUEL	TOMAHAWK DISTRIBUTORS	8939 BOZMAN NEAVITT RD	SAINT MICHAELS	MD	21663
FIKE, GARY L		6663 DICKERSON RD	DICKERSON	MD	20842
FIRST BEACH LLC		1034 WOODSHIRE LANE	STREET	MD	21154
FLAT BROKE SHOOTERS LLC		8402 TOPPING RD	BALTIMORE	MD	21208
		48845 SAINT JAMES CHURCH RD	LEXINGTON PARK	MD	20653

Federal Firearms Licensees

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LICENSE_NAME	BUSINESS_NAME	PREMISE STREET	PREMISE_CITY	PREMISE_STATE	PREMISE_ZIP_CODE
FORTITUDE TACTICAL GROUP, LLC		13804 GULLIVERS TRAIL	BOWIE	MD	20720
FORWARD FREEDOM, LLC	F4F	2509 BREAKNESS WAY	PRINCE FREDERICK	MD	20678
FOX, MICHAEL JAMES	FOX'S ARMORY	26656 THREE NOTCH RD	MECHANICSVILLE	MD	20659
FREDS FIREARM SERVICE LLC		21248 MAINE AVENUE	CHESTERTOWN	MD	216204349
FREE SPIRIT FIREARMS, LLC		9058 FAIRLEE RD	CHESTERTOWN	MD	21620
FREE STATE FIREARM SERVICES LLC		41 CHESTERS WAY	ELKTON	MD	21921
FREESTATE OUTDOORS INC	RON'S BAY PRO SHOP	2629 CHESAPEAKE BEACH RD W	DUNKIRK	MD	20754
FREEZE, JEFFREY SCOTT	ECLIPSE ENTERPRISES	15809 NORMAN DR	GAITHERSBURG	MD	20878
FRIED, RICHARD H	TGF SERVICES	24808 DUNNAVANT DR	GAITHERSBURG	MD	208820000
FROST ENTERPRISES LLC		20411 OLD FORGE ROAD	HAGERSTOWN	MD	21740
FRUH, FRANK HENRY	F & F DISTRIBUTING	13025 WALDORF FOREST RD	WALDORF	MD	206010000
FTS LLC		8009 JUMPERS HOLE ROAD SUITE H	PASADENA	MD	21122
FULLY COCKED, INC		423 EASTERN BLVD	ESSEX	MD	21221
GB SOUTH LLC	GUNBUNKER SOUTH	10916 YORK RD	COCKEYSVILLE	MD	21030
GCC ENTERPRISES, LLC	CODE 4 ARMS	1021 STANSBURY ROAD	PLYESVILLE	MD	21132
GENESIS ACADEMY, LLC		9722 BELAIR RD SUITE 4	NOTTINGHAM	MD	21236
GEPPETOS WORKSHOP LLC	STALLION ARMS	201 PROSPECT AVE #117	HAGERSTOWN	MD	21742
GERKIN, DAVID MICHAEL	DAGER ENTERPRISES	44462 CLARKES LANDING RD	HOLLYWOOD	MD	20636
GIBNEY, GEORGE LARRY		124 GREENMOUNT RD	ISING SUN	MD	21911
GILBERT, MICHAEL JAMES		317 STOCKHAMS LANE	ABERDEEN	MD	210014220
GLADHILL, JAMES FRANKLIN		24621 MARLBORO DR	DAMASCUS	MD	20872
GLASSMAN, EREZ	GEMM INDUSTRIES	718 PHEASANT DR	FOREST HILL	MD	21050
GOLD STAR GUN WORKS LLC		6668 TIMBER RIDGE LANE	BRYANS ROAD	MD	20616
GOSTOMSKI, WILLIAM M	GOSTOMSKI'S GUNSMITH SVC	16428 CALLA HILL RD NW	MOUNT SAVAGE	MD	215450000
GRAHAM, ANDREW DAVID		3015 WARREN GIBSON ROAD	HUNTINGTOWN	MD	20639
GRAHAM, CHARLES EDWARD		1059 WILSON CORONA RD	OAKLAND	MD	21550
GTACTICS & PROTECTION LLC	ZINK ARMS	9512 BELAIR ROAD	NOTTINGHAM	MD	21236
GUN MONKEYS ARMORY LLC	GUN MONKEYS ARMORY	606 CHARLES ST	LA PLATA	MD	20846
GUN SHACK INC	GUN SHACK	101 S MAIN ST	MOUNT AIRY	MD	217710000
GUTTERS FOR LESS INC	GUTTERS FOR LESS	19530 BEAVER CREEK RD	HAGERSTOWN	MD	21740
GUYETTE AND DEETER, INC		1210 S TALBOT UNIT A	ST MICHAELS	MD	21663
H4 GUNWORKS LLC		39 AUSTIN WAY	CENTREVILLE	MD	21617
HABASHI, NADER M	LAST FIREARMS	19 SOUTH ST	BALTIMORE	MD	21202
HARDING, STEUART ALLEN		7147 HYNSON RD	HURLOCK	MD	216430000
HAROLD EDWARD WEST III LLC		311 WESTHAVEN DR	SEVERNA PARK	MD	21146
HARREN, EDWARD H		2309 OAK DR	IJAMSVILLE	MD	217540000
HEBDEN, SKYLER JOHN	YOUR GUN DEPOT	706 PENSINGER BLVD	MOUNTAIN LAKE PARK	MD	215500000
HENDERSHOTS SPORTING GOODS INC		65 WEST MAIN	HANCOCK	MD	21750
HEWITT, JAMES	MUDDY BOTTOM FIREARMS	38011 MUDDY BOTTOM FARM LN	CLEMENTS	MD	20624
HIGHLAND SPORTING OUTFITTERS, LLC	HIGHLAND SPORTING OUTFITTERS	235 SCHILLING CIRCLE, SUITE 108	HUNT VALLEY	MD	21031
HILL, SEAN RYAN	RED DAWN DEFENSE	26276 WOODSIDE PATH	MECHANICSVILLE	MD	20659
HIMMEL, GARY M	HIMES STORE	1324 WERTON RD	KNOXVILLE	MD	217580000
HIMMEL FIREARMS LLC		2017 DUDLEY CORNERS ROAD	CRUMPTON	MD	21628
HOLDER, HENRY HOMER III	ACCURACY UNLIMITED CUSTOM GUNS	253 SALTGRASS DR	GLEN BURNIE	MD	21060
HOOVER, DANIEL MARK	ALL ABOUT HUNTING	16150 RIVER BEND CT	WILLIAMSPORT	MD	21795
HOOVER, JEFFREY ALLEN	HOOVER OUTFITTERS	17101 SPATES HILL RD	POOLESVILLE	MD	208370000
HOPKINS, GEORGE B	HOPKINS GAME FARM	13003 TURNERS CREEK RD	KENNEDYVILLE	MD	216450000
HUNTING & FISHING UNLIMITED LLC	SHORE SPORTSMAN	8232 OCEAN GATEWAY	EASTON	MD	216010000
HURLESS, DAVID R	FILE & STONE	109 CHRISTINE CT	SUDLERSVILLE	MD	21668
ICH FIREARMS LLC		312 HANNA CT	CHESTER	MD	21619
IKL CONSULTING LLC		3785 BOTELER RD	MOUNT AIRY	MD	21771
IRELAND, NEIL GERARD	TALBOT GUNSMITHING & RESTORATION	2 COLONIAL CT	EASTON	MD	21601
J & S SALES LLC	CONTINENTAL ARMS	9603 DEERCO ROAD SUITE 400-500	TIMONIUM	MD	21083
J AND J BAIT LLC	MOUNTAIN MARYLAND FIREARMS AND TRAINING	79 SOUTH GRANT STREET	FROSTBURG	MD	21532
J L SUITE LLC		559 MAYO RD	EDGEWATER	MD	21037
J&D PISTOLE, LLC		29660 DOVER ACRES ROAD	EASTON	MD	21601
J&J ARMORY LLC		3 GATESPRING COURT	COCKEYSVILLE	MD	21030

Federal Firearms Licensees

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LICENSE NAME	BUSINESS NAME	PREMISE STREET	PREMISE CITY	PREMISE STATE	PREMISE ZIP CODE
JACKS GUN WORKS LLC		321 B EARLTON RD	HAVRE DE GRACE	MD	21078
JCLG ENTERPRISES INC	J&S PAWN	223 EAST ALDER ST 1ST FLOOR	OAKLAND	MD	21550
JEFFERSON ARCHERY INC		3840 JEFFERSON PIKE	JEFFERSON	MD	21755
JH NETWORK AND CONSULTANT LLC	TRAINED ARMOR	5 MAIN STREET	REISTERSTOWN	MD	21136
JOHNSON, MATTHEW	HOLY+SHOOT!	1707 DELLABROOKE FARM LANE	BROOKESVILLE	MD	20833
JOLY ENTERPRISES LLC	SURE SHOT FIREARMS AND TACTICAL SUPPLY	2914 MOUNTAIN ROAD	PASADENA	MD	21122
JONATHAN MELNICK AUCTIONEERS INC		912/914 EAST 25TH ST	BALTIMORE	MD	212180000
JONES, DONALD BENJAMIN	D & L LOCKSMITHING	48292 MULBERRY LANE	ST INIGOES	MD	20684
JP'S TACTICAL & TRAINING LLC	JP'S TACTICAL & TRAINING LLC	3530 OXWED CT	WESTMINSTER	MD	21157
JRAGAN ENTERPRISES, LLC	SUSQUEHANNA ARMS	10 HAWTHORN DR	PORT DEPOSIT	MD	21904
JTW BUILDING SERVICES LLC		116 TAYLOR RD	CENTREVILLE	MD	21617
JYGP LLC	GUNSMOKE OUTFITTERS	9221 GUNSMOKE LN	WILLARDS	MD	21874
KAMENSKY, ROBERT JOHN	KAMENSKY KUSTOM	8701 WOODFIELD CT	GAITHERSBURG	MD	208820000
KARPFANY-TWO LIMITED LIABILITY COMPANY		2726 ALBERMARLE PLACE	WALDORF	MD	20601
KAVANAGH ELECTRIC COMPANY INC		3723 RUSH RD	JARRETTSVILLE	MD	21084
KDC GUN SALES LLC		7923 BOWIES POND PL	NANJEMOY	MD	20662
KEITHS GUNWORKS LLC	KEITHS GUNWORKS	10155 WEEDON RD	NEWBURG	MD	20664
KENDALL FIREARMS INC		5881 POLK LANE	PARSONSBURG	MD	21849
KESNER, LEONARD	VALOR GUN EXCHANGE	24 WALNUT ST	MIDDLETOWN	MD	21789
KEYMAR OUTDOORS LLC	KEYMAR OUTDOORS	1067 FRANCIS SCOTT KEY HIGHWAY	KEYMAR	MD	21757
KEYSTONE SPORTING GOODS INC		13611 PENNSYLVANIA AVE	HAGERSTOWN	MD	217420000
KISNER, WILLIAM HARRY	BILLS HOUSE OF GUNS	150 SHORT RUN RD	KITZMILLER	MD	215380000
KNIGHT, ROBERT BURTON	KNIGHT FIREARMS	27037 WALNUT TREE RD	EDEN	MD	218220000
KOCH, MICHAEL B	MIKES CUSTOM GUN SERVICE	2211 EASTERN BLVD 2ND FL FRONT LAW OFFICE	MIDDLE RIVER	MD	212200409
KOENIGSBERG, MATTHEW ARTHUR	KINGS MOUNTAIN	3623 LATHAM RD	BALTIMORE	MD	21207
KRAMER, ROBERT ED	REK FIREARMS	1620 HUDSON RD	CAMBRIDGE	MD	21613
KRAVITZ, NEIL S	NSK SALES CO	14207 LONGNECKER RD	REISTERSTOWN	MD	211364845
LAMBROS, ANTHONY N	HISTORIC RESTORATIONS	202 E BROADWAY	BEL AIR	MD	210140000
LARRY'S TRADING POST LLC		9917 STEPHEN DECATUR HWY #2 & #3	OCEAN CITY	MD	21842
LARSON, JEFFREY HUGH		3218 TWIN OAK LN	HUNTINGTOWN	MD	20639
LEAGAN, JOHN		15700 CLOVERLEAF CT	HUGHESVILLE	MD	20637
LEBER, JOHN L	JOHN LEBERS GUNSMITHING	1529 CEDARHURST RD	SHADY SIDE	MD	20764
LEKITES, JAMIE		30419 GREGORY LANE	PRINCESS ANNE	MD	21853
LIFELINE ENTERPRISES, LLC		611 HILL TOP RD	ORCHARD BEACH	MD	21226
LITTLETON, DAVID WAYNE	LITTLETON FIREARMS	13105 AMES RD	BISHOPVILLE	MD	218130000
LOCK STOCK & BARREL, LLC		6510 KEYSVILLE ROAD	KEYMAR	MD	21757
LOCKBOX ARMS AND ACCESSORIES LLC		912 OLD WESTMINSTER PKE	WESTMINSTER	MD	21157
LOCKED & LOADED LLC		1512 OLD TANETOWN ROAD	WESTMINSTER	MD	21158
LOVEJOY, MICHAEL A SR	ALL AMERICAN GUN EXCHANGE	101 WOODSIDE AVE	THURMONT	MD	21788
LOVELACE, BRUCE	B/D GUNS	598 RISING SUN ROAD	RISING SUN	MD	21911
LOWE, CHRISTIAN ANTHONY		5920 SEARL TERRACE	BETHESDA	MD	20816
LOWE, JOHN ALVIN JR	JLOWES GUNS	1573 THEODORE RD	RISING SUN	MD	21911
LTC CYBER SOLUTIONS, LLC	LTC FIREARMS	12111 STARDRIFT DR	GERMANTOWN	MD	20876
LUCKEROTH, ANDREW SHAWN		800 OAKWOOD ROAD	GLEN BURNIE	MD	21061
M CHASE PROPERTIES LLC	GUNS AND AMMO	9295 CLIFFORD DR	WHITE PLAINS	MD	20695
MACBRYDE, JOHN CHARLES	K & M AMMO	38950 HOLLYBANK DR	MECHANICSVILLE	MD	206590000
MALAKAI LLC	URBANA GUNS & ARMOR	8925 FINGERBOARD ROAD SUITE D	URBANA	MD	21704
MARCOS, JOSE ALBERTO	WORLDWIDE SPORTS	109 EAGLE HEAD DR	FORT WASHINGTON	MD	207440000
MARCS, WESTLEY ANDREW	MARKS SPORTING GOODS	13510 BRICE HOLLOW RD SE	CUMBERLAND	MD	21502
MARTINEK, CHESTER DANIEL	MARTINEK GUN SHOP	2232 ELLIOTT ISLAND RD	VIENNA	MD	21869
MARYLAND CERAKOTE LLC	MARYLAND CERAKOTE & GUN WORKS	1215 BANCROFT COURT	BEL AIR	MD	21014
MARYLAND NAT'L CAPITAL PARK & PLANNING COMM	PRINCE GEORGE'S COUNTY TRAP & SKEET CTR	10400 GOOD LUCK RD	GLENN DALE	MD	207690000
MARYLAND SMALL ARMS RANGE INC		9801 FALLARD COURT	UPPER MARLBORO	MD	20772
MARZALE, SCOTT MICHAEL	CAPSTONE FIREARMS AND TRAINING	1804 HARFORD RD	FALLSTON	MD	21047
MASADA TACTICAL LLC		2710 MOUNTAIN ROAD, SUITE 204	PASADENA	MD	21122
MASON DEFENSE LLC		2115 TELEGRAPH ROAD	PYLESVILLE	MD	21132
MASON DIXON GAME OUTFITTERS LLC		2200 CHANNEL RD	PYLESVILLE	MD	21132

Federal Firearms Licensees

Source: ATF Website <https://www.atf.gov/firearms/listing-federal-firearms-licensees>

LICENSE_NAME	BUSINESS_NAME	PREMISE_STREET	PREMISE_CITY	PREMISE_STATE	PREMISE_ZIP_CODE
MASTER SECURITY COMPANY LLC		8400 CORPORATE DRIVE SUITE 255	LANDOVER	MD	20785
MAXIMUM DEFENSE LLC		1330 DILLON HEIGHTS AVE	CATONSVILLE	MD	21228
M-CATS, LLC		25144 PEGRINE WAY	HOLLYWOOD	MD	20636
MCCARTHY, MICHAEL LYNN SR	WESTERN MARYLAND GUN REPAIR	8 HILL SIDE RD	HANCOCK	MD	21750
MCCOOL, RALPH WILSON		1237 ELK FOREST RD	ELKTON	MD	219210000
MCCOY, RICHARD EARL	RICH'S GUN SHOP	21279 WOODMERE DR	LEONARDTOWN	MD	206500000
MCPHERSON, GARY LEE	MCPHERSON CUSTOM RIFLES	13231 MT ZION RD	SABILLASVILLE	MD	217800000
MCULSKY, ALEXANDER		701 E GUDE DR STE 101	ROCKVILLE	MD	20850
MD ARSENAL INC		19828 NATIONAL PIKE	HAGERSTOWN	MD	21740
MD HQL TRAINING LLC		2916 TARRAGON LN	BOWIE	MD	20715
MD POLICE SUPPLY LLC		1520 OLD EASTERN AVE	BALTIMORE	MD	21221
MEAKIN, JOHN JAMES IV	SALISBURY SHOOTERS SUPPLY	4454 COULBOURN MILL RD	SALISBURY	MD	21804
MFL GOLBAL, LLC	GUN FUSION	20 PIKE HALL PLACE	NOTTINGHAM	MD	21236
MID MARYLAND OUTFITTERS INC		7700 GROVER DR	FREDERICK	MD	217040000
MILITARY RESEARCH ASSOCIATES LLC	MID-ATLANTIC MILITARY ANTIQUES	2716 ARVIN ST	SILVER SPRING	MD	20902
MILLER, CURTIS JAMES	PRECISION GUN WORKS	11890 WOODBURY RD	NANJEMOY	MD	206620000
MILLER, JEFFREY DAVID	CLEAR SPRING GUN SHOP	13708 NATIONAL PIKE STE 1	CLEAR SPRING	MD	21722
MILLER, RICHARD CHARLES	MILLER'S GUN SERVICE	45805 CHURCH DR	GREAT MILLS	MD	206340000
MILLER, ROGER A	MILLERS GUNWORKS	18842 WICOMICO RIVER DR	COBB ISLAND	MD	20625
MILLER, WILLIAM E	OLIVER FISH & GAME	2936 BEECHWOOD LN	FALLSTON	MD	210470000
MISAL, DENNIS ARTHUR	MOUNTAIN SUPPLY	10247 KENSINGTON PKWY	KENSINGTON	MD	208950000
MKP TACTICAL, LLC		1625 W OLD LIBERTY RD	SYKESVILLE	MD	21784
MOLLY'S PLACE, LLC		12503 B AUGUSTINE HERMAN HWY	KENNEDYVILLE	MD	21645
MONTGOMERY, JAN HOPKINS	THE SCOREMASTERS	7561 LINDBERGH DR	GAITHERSBURG	MD	208790000
MOSCHETTO, LOUIS JOHN JR	GI G'S GUN SHOP	1805 WESTERN SHORES BLVD	PORT REPUBLIC	MD	20676
MOULDEN, ROBERT L JR		4942 ILCHESTER POINT CT	ELICOTT CITY	MD	21043
MOWERY, JOSEPH SR	J & J GUNS	509 AUGUST ST	EASTON	MD	21601
MROZ, JAMIE	BLUE FINS TWO	701 WISE AVE	BALTIMORE	MD	21222
MULDERICK, RICHARD JOHN		7501 KENT POINT ROAD	STEVENSVILLE	MD	21666
MULTIPARTS & SERVICES INC		5647 BELLE GROVE RD	BALTIMORE	MD	21225
MURRAY, GLENN WILLIAM	MURF'S FIREARMS	31079 SKIPTON CORDOVA RD	CORDOVA	MD	21625
NATIONAL WEAPONCRAFT INSTITUTE, INC	NWI	9801 FALLARD COURT #300	UPPER MARLBORO	MD	207726706
NEAL, FORREST P III	L & F ENTERPRISES	19228 A ORBIT DR	GAITHERSBURG	MD	208790000
NEWCOMB, CHARLES DAVID	CHUCK'S GUN SHOP	1500 AVIEMORE PL	BEL AIR	MD	210150000
NGDG INDUSTRIES INC	MISHA & CO	10751 FALLS ROAD SUITE 119	LUTHERVILLE TIMONIUM	MD	21093
NOCK, MILTON JAMES		1008 W MAIN ST UNIT A	SALISBURY	MD	21801
NOLTE, PAUL F JR	NOLTE GUNSMITHING & RELOADING	718 OLD BALTIMORE RD	WESTMINSTER	MD	211570000
NOVIC, DOUGLAS WILLIAM	DC LASER	14428 MARSH PIKE	HAGERSTOWN	MD	21742
OAK TREE OUTDOORS, LLC		8043 AVILTON LONACONING ROAD	LONACONING	MD	21539
OCH, FRANK PHILIP JR	ACCURACY CLINIC	19640 FISHER AVE	POOLESVILLE	MD	20837
OKRASINSKI, JOSEPH L JR	M&O ENTERPRISES	101 S BROADWAY	BALTIMORE	MD	212310000
OMEGA DEFENSE SOLUTIONS LLC		2411 CROFTON LANE STE # 24	CROFTON	MD	21114
ON MISSION INCORPORATED	ON MISSION ARMS	600 PHILADELPHIA RD	JOPPA	MD	21085
OPERATION NO PERSON LEFT BEHIND OUTDOORS, INC	NPLB OUTDOORS	1302 RISING RIDGE RD SUITE 11	MOUNT AIRY	MD	21771
OPTIMUM ARMS LLC		1009 THOMAS RUN RD	BEL AIR	MD	21015
OUTDOOR PRO SHOP, LLC		658 B STREET	PASADENA	MD	21122
P S SOLUTIONS INC		200 ALEXANDER AVE	SALISBURY	MD	21801
PA PORTER INVESTMENTS LLC	AMMO AND THINGS	9230 GENEVIEVE DR	WHITE PLAINS	MD	20695
PADESTATE LLC	GUNSLINGER'S GUNS	4826 MARS DEN CT	FREDERICK	MD	21703
PAPPAPOTIS, MICHAEL S	TECHARMAMENT	115 LAWYER'S ROW UNIT G-1	CENTREVILLE	MD	21617
PARKVILLE FIREARMS TRAINING LLC		18 COCKEYSVILLE RD SUITE 205M	COCKEYSVILLE	MD	21030
PARMEER, MATTHEW THOMAS & CATHERINE MARIE	PARMEER ENTERPRISES / PARMS	8 NORTHWOODS BLVD	NORTH EAST	MD	21901
PARSONS, CHRISTOPHER MICHAEL		22398 CROSSBILL LN	LEONARDTOWN	MD	20650
PASADENA ARMS LLC	PASADENA ARMS	2441A MOUNTAIN RD	PASADENA	MD	21122
PATRIOT VENTURES, LLC	MD GUNS & GEAR	6542 MORRIS ROAD	PITTSVILLE	MD	21850
PAX RIVER SKEET CLUB		TATE RD NAS BUILDING 2039	PATUXENT RIVER	MD	206700000
PETE'S CUSTOM SHOP INC		7924 PHILADELPHIA RD	BALTIMORE	MD	212370000

2A Maryland

Federal Firearms Licensees

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LICENSE_NAME	BUSINESS_NAME	PREMISE STREET	PREMISE_CITY	PREMISE_STATE	PREMISE_ZIP_CODE
PHOENIX PROTECTIVE SOLUTIONS, LLC	PHOENIX PROTECTIVE SOLUTIONS	6239 CRAIN HIGHWAY	UPPER MARLBORO	MD	20772
PHOENIX TRADING INC		640 LOFSTRAND LN	ROCKVILLE	MD	20850
PIKESVILLE ARMS LLC		303 CHURCH LN	PIKESVILLE	MD	21208
PINKARD, PAUL ANTHONY	TRI STAR	6317 NAYLORS RESERVE CT	HUGHESVILLE	MD	20637
POINTMAN RESOURCES LLC		11901 MILLBROOKE CT	MONROVIA	MD	21770
POLK, WADE KENDALL & EHRISMAN, TANYA KAYE	KENDALL FIREARMS	5881 POLK LANE	PARSONSBURG	MD	21849
POVERNI VENTURES, LLC		400 WEST FRANKLIN STREET SUITE 400	BALTIMORE	MD	21201
POW POW GUNSMITHING LLC		16758 SPIELMAN ROAD	FAIRPLAY	MD	21733
PRACTICAL GUN SAFETY TRAINING LLC		10214 BIGNONIA DRIVE	LAUREL	MD	207083158
PRECISION DEFENSE SOLUTIONS LLC		7 POST OFFICE ROAD SUITE D	WALDORF	MD	20602
PRECISION FIREARM SERVICES, LLC		10355 TYDINGS COURT	LA PLATA	MD	20646
PRECISION POINT LLC	PRECISION POINT SHOOTING AND TRAINING CENTER	4537 METROPOLITAN CT	FREDERICK	MD	21704
PSORAS, THOMAS DENNIS		608 BALTIMORE AVE	TOWSON	MD	212040000
QUAY, WILLIAM W JR	HHI	11612 MIDDLEBROOK RD	GERMANTOWN	MD	20876
QUEEN CITY ARMORY INC	QUEEN CITY ARMORY	106 SOUTH WINECOW STREET	CUMBERLAND	MD	21502
R & R GUNS & AMMO LLC		52 SOUDER RD	BRUNSWICK	MD	21716
REALCO GUNS, INC		6108 MARLBORO PIKE	FORESTVILLE	MD	207470000
RECTOR, WERTH FREDERICK		306 KEHM RD	QUEENSTOWN	MD	21658
REDSTICK ENGINEERING LLC	OH SHOOT GUNS	2039 WETTERHORN DR	BEL AIR	MD	210156234
REFLECTIONS OUTDOORS LLC		1034 PYSELL CROSSCUT RD	OAKLAND	MD	21550
RELIABLE AUTO SALES INC		1663 W PULASKI HWY	ELKTON	MD	21921
RELOAD FIREARMS, LLC	RELOAD FIREARMS	844 WARFIELD SBURG ROAD	WESTMINSTER	MD	21157
RENTSCHLER, OSCAR THOMAS	OSCAR'S GUN SHOP	32509 DUBLIN RD	PRINCESS ANNE	MD	21853
REVERE, LLC	SHORE ARMS	750 MD ROUTE 3 SOUTH SUITE 17 B	GAMBRILLS	MD	21054
RICCIO, LEONARD JOHN		403 GLEBE RD	EASTON	MD	21601
RICH, GEORGE SUNDERLAND		1925 OLD VALLEY RD SUITE 3 UNIT 13	STEVENSON	MD	21153
RICHARDSON, BRYON	FUR FIN & FEATHERS	23501 MARSH RD	MARDELA SPRINGS	MD	218370000
RIGGIE, ANDREW PAUL		14731 BETULA WAY	DAYTON	MD	21036
RK86 LLC	THE MACHINE GUN NEST	7910 REICHS FORD RD	FREDERICK	MD	21704
RKW COLLECTOR FIREARMS LLC		3318 POPLAR RUN RD	HAMPSTEAD	MD	21074
ROSE, ROBERT DEAN	R D ROSE AND SONS	12525 VANOUS RD	DUNKIRK	MD	20754
ROSS, GARY LEE	GLR ENTERPRISES	37680 MOHAWK DR UNIT 1	CHARLOTTE HALL	MD	20622
RS SHOOTING SPORTS, LLC	RS SHOOTING SPORTS	110D COUNTRY DAY ROAD	CHESTER	MD	21619
RUDICK LAW, LLC		1 WILLIAM COURT	SPARKS	MD	21152
RUSH TACTICAL, LLC		22180 TIMBERLINE COURT	LEONARDTOWN	MD	20650
RUSSELL, ROBERT ALLAN JR		21585 GERARD'S COVERD	ABELL	MD	20606
S AND S GUNS, LLC		3252 SOLOMONS ISLAND RD	HUNTINGTOWN	MD	20639
SABO, MICHAEL ALEXANDER		1104 MINT TER	WESTMINSTER	MD	21157
SAEZ, LAWRENCE S	BEL AIR DEFENSE AND PROTECTION	2439 MONARCH WAY	BEL AIR	MD	21015
SAFE HARBOR ARMS LLC		5419 PEACH TREE DR	CAMBRIDGE	MD	21613
SAFEHOUSE TRAINING AND FIREARMS, LLC		1253 CAMBRIA ROAD	WESTMINSTER	MD	21157
SAINT FIREARMS	SAINT FIREARMS	601E BACK RIVER NECK RD	ESSEX	MD	21221
SAMUELS, JAMES G JR	JGS BUSINESS SERVICES	13000 ST GREGORY CT	BOWIE	MD	20721
SANG RUN SPORTS SHOP LLC		113 HENRY CLAY DR	OAKLAND	MD	21550
SANGER INC	WESTERN AUTO ASSOCIATE STORE	204E WATER ST	CENTREVILLE	MD	21617
SCHARF ENTERPRISES INC	SCOTTS GUNSMITHING SERVICE	231 THELMA AVE	GLEN BURNIE	MD	21061
SCHENK, JOHN B JR		569 HENDERSON RD	BEL AIR	MD	210140000
SCHLISSLER, PHILIP BRUCE	SAVAGE RIVER GUN REPAIR	430 WILDLAND DR	SWANTON	MD	215610000
SCHOOL OF THE AMERICAN RIFLE, LLC		82 AUGUSTA DRIVE	ELKTON	MD	21921
SCHUERHOLZ, ROBERT J JR	WINDY ACRES FIREARMS	85 WINDY HILL FARM LANE	CENTREVILLE	MD	21617
SHARP SHOOTERS, LLC		40 INDEPENDENCE LANE	OAKLAND	MD	21550
SHAWLEY'S HARDWARE INC	COLLECTOR'S CORNER	17619 LAPPANS RD	FAIRPLAY	MD	21733
SHELLY, HENRY THOMAS JR	ANCHOR ARMS	30521 ZION RD	SALISBURY	MD	21804
SHEPHERD ARMAMENT LLC		44805 CLARKS MILL RD	HOLLYWOOD	MD	20636
SHILOH, KEITH A	WEST CARROLL ARMS	955 MURPHY CT	NEW WINDSOR	MD	21776
SHORE ENTERPRISES LLC	TALBOT ARMS	9461 NEW RD	MCDANIEL	MD	21647
SHORE SHOOTER LLC	SHORE SHOOTER	6240 HARMONY RD	PRESTON	MD	21655

Federal Firearms Licensees

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LICENSE NAME	BUSINESS NAME	PREMISE STREET	PREMISE CITY	PREMISE STATE	PREMISE ZIP CODE
SHUPP, SHAWN PAUL	SHUPPIES GUN SHOP	12313 FORREST HILL RD	CLEAR SPRING	MD	21722
SIKORA, WILLIAM J III	SIKORA LTD GUNSMITH	4361 BEECHWOOD PLACE	CRISFIELD	MD	21817
SILVER SPRING GUILD LLC	SILVER SPRING GUILD	10143 SUTHERLAND RD	SILVER SPRING	MD	20901
SINNER CUSTOMS LLC		325 E BALTIMORE ST	TANEYTOWN	MD	21787
SMITH, EDWARD LLOYD JR	SMITH SERVICE'S	2985 CHECKER FLAG PL	INDIAN HEAD	MD	20640
SMITH, MATTHEW JASON	ALS ARMOY	5248 WENTZ ROAD	MANCHESTER	MD	21102
SMITH, TIMOTHY WAYNE	SMITH'S AUCTION SERVICE	266 N PENNSYLVANIA AVE	HANCOCK	MD	21750
SMITH, WAYNE KEVIN	SWEENEYS HUNTING SUPPLIES	13238 CATOCTIN FURNACE RD	THURMONT	MD	217880000
SNIDDYS GUNWORKS LLC		17414 HOSKINSON RD	POOLESVILLE	MD	20837
SOMERSET HIDDEN TREASURES LLC		11765 SOMERSET AVE	PRINCESS ANNE	MD	21853
SOUTH COUNTY ENTERPRISES LLC	SOUTH COUNTY SPORTSMEN	5463 SOUTHERN MARYLAND BLVD STE 6	LOTHIAN	MD	20711
SOUTH MOUNTAIN ROD & GUN CLUB INC		23523 FOXVILLE RD	SMITHSBURG	MD	217830144
SOUTHERN YANKEE GUNS MARYLAND LLC	BUSTED KNUCKLE GUNS	704 CHURCH HILL RD	CENTREVILLE	MD	21617
SPARTAN FIREARMS TRAINING GROUP, LLC		528 KLEES MILL RD	SYKESVILLE	MD	21784
SPECIAL RESPONSE CORPORATION		14804 YORK RD	SPARKS	MD	21152
SPECIALTY RESCUE INC		1826 SNYDERSBURG RD	WESTMINSTER	MD	21157
SPORAY, RALPH JOHN	HKB	216 HOPKINS RD	HAVRE DE GRACE	MD	21078
STAMLER, JOSEPH JOHN		122 W GOLDFINCH LANE	CENTREVILLE	MD	21617
STANLEY, ALLEN K	THE STOCK SHOP	400 IRENE DR	GLEN BURNIE	MD	210610000
STERLING, EDWIN COULBOURNE JR	STERLING FIREARM REPAIR	32991 LAWSONIA RD	CRISFIELD	MD	21817
STEVENS, DAVID LEESR		1729 GARDEN OF EDEN RD	CAMBRIDGE	MD	21613
STEWART, JAMES EDWARD JR	JRG WHOLESale	1831 MIDSUMMER LN	JARRETTSVILLE	MD	21084
STOUFFER'S AUCTION CO, INC		23506 RINGGOLD PIKE	SMITHSBURG	MD	21783
STRICKLAND, JOHN LAWRENCE	JACOB'S ARMS & AMMO	13003 SIXTH AVE	CRESAP TOWN	MD	21502
T47 INTERNATIONAL, INC		16901 MELFORD BLVD, SUITE 129	BOWIE	MD	20715
TACTICAL AMERICAN SECURITY CONSULTING, LLC	USTASC	2326 GODDARD PARKWAY, UNITS B & C	SALISBURY	MD	21801
TACTICAL SHEPHERD LLC		1573 THEODORE ROAD	RISING SUN	MD	21911
TACTICAL SUBMISSION LLC	TACTICAL SUBMISSION	48660 WYNNE RD	RIDGE	MD	20680
TARGET ACQUIRED LLC		3555 LEONARDTOWN ROAD UNIT 7	WALDORF	MD	20601
TELOS SOLUTIONS, LLC	TELOS FIREARMS	47250 SCHWARTZKOPF DR	LEXINGTON PARK	MD	20653
TEW-A FIREARMS LLC		5619 GERLAND AVENUE	BALTIMORE	MD	21206
TFOG LLC	RETIC ARMS	3035 BASFORD RD	FREDERICK	MD	21703
TGF ARMOY LLC		5484 SOUTHERN MD BLVD	LOTHIAN	MD	20711
THE AMERICAN REDNECK COMPANY, LLC	AMERICAN REDNECK MUNITIONS	7967 STEVENS RD	OWINGS	MD	20736
THE BASSIN BOX INC		1068 NATIONAL HIGHWAY	LAVALLE	MD	21502
THE EASTERN SERVICE CORPORATION	EASTERN SERVICE CORPORATION	106 WASHINGTON STREET	CAMBRIDGE	MD	21613
THE GUN CENTER OF MARYLAND, LLC	THE GUN CENTER	1713 ROSEMONT AVE	FREDERICK	MD	21702
THE GUNFATHER LLC		225 MARKET ST	DENTON	MD	21629
THE KLEI ORANGE COMPANIES LLC	KLEI ORANGE FIREARMS	2992 BETHEDEN CHURCH RD	POCOMOKE CITY	MD	21851
THE POINT AT PINTAIL LLC		511 PINTAIL POINT FARM LANE	QUEENSTOWN	MD	21658
THE RANGE INC		725 MONARCH LANE	HUNTINGTOWN	MD	20639
THE SPORTSMAN LTD		6184 OCEAN GATEWAY STE A	TRAPPE	MD	216732005
THE TACKLE BOX INC		22035 THREE NOTCH RD	LEXINGTON PARK	MD	206530000
THOMAS MENGARINI, LLC	TOMMY GUN	12406 SANDAL LANE	BOWIE	MD	20715
THOMAS, CAROLYN B	DISTILLERY LANE SALES	1525 HARE HOLLOW RD	GRANTSVILLE	MD	21536
THOMAS, JOSEPH DONALD	THOMAS GUN SALES	21248 WHITE NECK RD	BUSHWOOD	MD	20618
THOMAS, WILLIAM JEROME	TRIPLE BRAVO	1 OLD STAGE CT	ROCKVILLE	MD	20852
THOMSEN, JEFFREY NORMAN		5979 KETCH ROAD	PRINCE FREDERICK	MD	20678
THORNLEY, RICHARD LUNN		1205 TAFT ST	ROCKVILLE	MD	208500000
THREE GUYS GUNS AND OUTDOORS LLC		13124 WARRIOR DR	CRESAP TOWN	MD	21502
TODD, DENNIS EDWARD SR		6109 ELDORADO FEDERALSBURG RD	RHODESDALE	MD	21659
TOMKAT AMMUNITION LLC	TK DEFENSE	18 CESSNA COURT	GAITHERSBURG	MD	20879
TOMMYGUN CUSTOMS LLC		10121 SADDLERIDGE DR	MYERSVILLE	MD	21773
TRL FIREARMS & GUNSMITHING LLC		106 E ISABELLA ST	SALISBURY	MD	21801
TUCKAHOE SPORTSMAN INC	TUCKAHOE SPORTSMAN	22145 SHORE HWY	DENTON	MD	21629
TWINNYS SUN TANNING INC	TWINNYS SUN & GUNS	617 MILL LN	GALENA	MD	21635
UBR ENTERPRISES LLC		10692 QUARTERSTAFF RD	COLUMBIA	MD	21044

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LICENSEE NAME	BUSINESS NAME	PREMISE STREET	PREMISE CITY	PREMISE STATE	PREMISE ZIP CODE
UNDERWOOD, JEFFREY	UNCOMMON ARMS	6S51 WALNUT GROVE	COLUMBIA	MD	21044
URSIC, JACK H	PATUXENT RIVER GUNS	10025 TRUJMAN RD SUITE 102	LUSBY	MD	206570000
VALENTINE FABRICATORS LLC		550 CRAIN HWY NE UNIT 32	GLEN BURNIE	MD	21061
VAN DYKE, CLYDE II		2807 BLUE BALL ROAD	ELKTON	MD	21921
VARRECCHIA, THOMAS RALPH	MID-MARYLAND GUN REPAIR	11103 HESSONG BRIDGE RD	FREDERICK	MD	21701
VAUGHAN, DANIEL FRANKLIN		2837 BRADENBAUGH RD	WHITE HALL	MD	21161
VOSBURGH, BRADLEY EUGENE	BROWNSTONE TRADING CO	2029 N OLD BACHMAN VALLEY RD	WESTMINSTER	MD	211570000
VOTTA, FRANCIS XAVIER		1117 DANIELS AVE	BALTIMORE	MD	21207
W FREAR INNOVATIONS LLC		3513 MARIGOLD DR	MONROVIA	MD	21770
WALCHUCK, JOSEPH RICHARD SR	RICH'S POWDER COATING	7390 FREESTATE DR	MIDDLETOWN	MD	21769
WALKER TRAINING & FIREARMS LLC		630 WHITE CLOUD CT	ELDERSBURG	MD	21784
WAL-MART STORES EAST LP	WAL-MART STORE # 1981	45485 MIRAMAR WAY	CALIFORNIA	MD	20619
WAL-MART STORES EAST LP	WAL-MART STORE # 2853	40 DRURY DR	LA PLATA	MD	20646
WAL-MART STORES EAST LP	WAL-MART #5345	10600 TOWNE CENTER BLVD	DUNKIRK	MD	20754
WAL-MART STORES EAST LP	WAL-MART STORE # 1968	645 S PHILADELPHIA BLVD	ABERDEEN	MD	21001
WAL-MART STORES EAST LP	WALMART #3780	303 FALLSTON BLVD	FALLSTON	MD	21047
WAL-MART STORES EAST LP	WALMART # 1875	407 GEORGE CLAUWSS BLVD	SEVERN	MD	21144
WAL-MART STORES EAST LP	WAL-MART STORE # 2027	12500 COUNTRY CLUB MALL RD SW	LAVALE	MD	21502
WAL-MART STORES EAST LP	WAL-MART STORE # 2894	13164 GARRETT HWY	OAKLAND	MD	21550
WAL-MART STORES EAST LP	WAL-MART STORES #1715	8155 ELLIOTT ROAD	EASTON	MD	21601
WAL-MART STORES EAST LP	WAL-MART STORE # 2272	2775 DORCHESTER SQUARE	CAMBRIDGE	MD	21613
WAL-MART STORES EAST LP	WAL-MART STORE # 2756	2421 MONOCACY BLVD	FREDERICK	MD	21701
WAL-MART STORES EAST LP	WAL-MART SUPERCENTER #2233	7400 GUILFORD DR	FREDERICK	MD	21704
WAL-MART STORES EAST LP	WALMART # 1674	17850 GARLAND GROH B	HAGERSTOWN	MD	21740
WAL-MART STORES EAST LP	WALMART # 2790	10420 WALMART DR	HAGERSTOWN	MD	21740
WAL-MART STORES EAST LP	WAL-MART STORE # 2551	209 E RIDGEVILLE BLVD	MOUNT AIRY	MD	21771
WAL-MART STORES EAST, LP	WALMART # 2850	2320 NO HANOVER PIKE	HAMPSTEAD	MD	21074
WAL-MART STORES EAST, LP	WALMART # 3843	610 LEGION RD	DENTON	MD	21629
WALSTON, STEVE JOHN	WALSTON FIREARMS	32472 MORRIS LEONARD RD	PARSONSBURG	MD	218492525
WALTON, ANTHONY THOMAS		2809 SAGEWOOD DRIVE	GLENWOOD	MD	21738
WALZ, BENJAMIN HARRY		5490 FREDDY PL	WELCOME	MD	20693
WARD, RENE		11730 CORNFIELD DR	LUSBY	MD	20657
WASSELL WORKS LLC		4017 WESTERNPORT RD SW	WESTERNPORT	MD	21562
WEBSTER, ROGER LANKFORD JR		808 SPRINGFIELD CIR	SALISBURY	MD	218040000
WIDDOES, CHARLES CARSON	BACKWOODS FIREARMS	7917 HURLEYS NECK RD	MARDELA SPRINGS	MD	21837
WILDLIFE ACHIEVEMENT CHAPTER INC		2344 OLD FIELDPOINT RD	ELKTON	MD	219210000
WILLEY, CHRISTOPHER ANTHONY	IZAAK WALTON LEAGUE OF AMERICA	26430 MULLINIX MILL RD	MOUNT AIRY	MD	217710000
WILLIAMS, MICHAEL		2702 SHERMAN DRIVE	CHESTER	MD	21619
WILLIAMS, RICHARD ANTHONY	A & D FIREARMS	20452 SUNBRIGHT LN	GERMANTOWN	MD	20874
WILLNECKER, RAYMOND JAMES		11260 RICE CREEK CRT	LA PLATA	MD	20646
WINK, ROBERT GARY	WINKS SPORTING GOODS	1820 HAREWOOD RD	EDGEWOOD	MD	21040
WOLFE, ROBERT LEE III	GUNRUNNERS	12122 A CAROL LANE	PRINCESS ANNE	MD	218530000
WOOD, BARRY COVINGTON JR	SAFE AT HOME SPORTS	47 E PATRICK ST #2	FREDERICK	MD	217010000
WORTH-A-SHOT INC	WORTH A SHOT	1615 OLD ADELINA RD	PRINCE FREDERICK	MD	20678
YOMMER, JEFFREY ALLEN	DOWN RANGE WEAPONRY	8424 VETERANS HWY SUITES 8-12	MILLERSVILLE	MD	21108
ZEITZ, JOHN GARY JR	WARRIOR ARMAMENT & SUPPLY	425 AMISH RD	GRANTSVILLE	MD	21536
ZION ACRES FIREARMS, LLC		25309 OAK DRIVE	DAMASCUS	MD	20872
A & D PAWN SHOP INC		77 ZION ACRES RD	NORTH EAST	MD	21901
ARUNDEL PAWN LLC		706 N CRAIN HWY STE 2	GLEN BURNIE	MD	21061
BACKBONE MT SPORTS CENTER & PAWN LLC		7427 BALTIMORE ANNAPOLIS BLVD	GLEN BURNIE	MD	21061
BALTIMORE'S BEST PAWN INC	MARYLAND ELITE FIREARMS	4768 GEORGE WASHINGTON HWY	OAKLAND	MD	21550
BANK OF MEMORIES LLC		2977 BALTIMORE BLVD	FINKSBURG	MD	21048
BEST PAWN INC	THE BANK	72 PATTERSON AVENUE	PERRYVILLE	MD	21903
BUS FURNITURE INC	BEST PAWN	6609 RIVERDALE RD	RIVERDALE	MD	207370000
CLARK LOAN & JEWELRY INC	CRAZY LOUIES PAWN SHOP	2614 N SALISBURY BLVD	SALISBURY	MD	21801
COLE'S PAWNBROKERS OUTLET INC		700 S PHILADELPHIA BLVD	ABERDEEN	MD	21001
	COLE'S PAWNBROKERS OUTLET	242 NORTH MARKET ST	FREDERICK	MD	21701

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Federal Firearms Licensees

Source: ATF Website <https://www.atf.gov/firearms/listing-federal-firearms-licensees>

LICENSE NAME	BUSINESS NAME	PREMISE STREET	PREMISE CITY	PREMISE STATE	PREMISE ZIP CODE
FAMOUS PAWN, INC	FIRST CASH PAWN	1409 W PATRICK ST	FREDERICK	MD	21702
GRIFFITH, MICHAEL	ARUNDEL PAWN	7427 BALTIMORE & ANNAPOLIS BLVD	GLEN BURNIE	MD	21061
HAGERSTOWN JEWELRY & LOAN INC	ROYAL PAWN	11205 JOHN F KENNEDY DR # 104	HAGERSTOWN	MD	21742
J & K ASSOCIATES INC		2145 PULASKI HWY	HAVRE DE GRACE	MD	210780000
JCLG ENTERPRISE INC	J&S PAWN	47 EAST WASHINGTON STREET	HAGERSTOWN	MD	21740
JCLG ENTERPRISES INC	J & S PAWN	27 E MAIN ST	FROSTBURG	MD	21532
NORTHWESTERN LOAN CO	SIMPSON'S LOAN OFFICE	1637 PENNSYLVANIA AVE	BALTIMORE	MD	212170000
NORTHWESTERN LOAN COMPANY		1701 PENNSYLVANIA AVE	BALTIMORE	MD	212170000
PPG PASADENA PAWN & GUN LLC		2515 MOUNTAIN ROAD	PASADENA	MD	21122
RICKS GUN AND PAWN LLC		536 ROWLANDSVILLE ROAD	CONOWINGO	MD	21918
RIDGELY TRADING POST LLC		510 CENTRAL AVE	RIDGELY	MD	21660
ROCK N ROLL OUTFITTERS, INC	CRAZY LOUIE'S PAWN SHOP	122-124 SOUTH BLVD	SALISBURY	MD	21801
SCHICK SALES INC	ALL PAWN	10595 MIDDLE PORT LA	WHITE PLAINS	MD	20695
SHEILA'S JEWELRY & LOAN LLC	SHEILA'S JEWELRY & LOAN	1061 VIRGINIA AVENUE	HAGERSTOWN	MD	21740
SOUTHERN MARYLAND PAWN BROKERS LLC	SOUTHERN MARYLAND PAWN BROKERS	3255 LEONARDTOWN ROAD	WALDORF	MD	20601
TOP GUN FIREARMS LLC		2800 BELAIR RD	FALLSTON	MD	21047
WHITE MARSH ARMS INC		9603 DEERCO RD SUITE 400	TIMONIUM	MD	21093
BROWN, JACK SUNVILLE	2ND GENERATION FIREARMS	7735 FAIRPLAY RD	BOONSBORO	MD	21713
CARDONA, PETER G	QUALITY CARTRIDGE	42495 ANNE CT	HOLLYWOOD	MD	206360000
COHERENT TECHNICAL SERVICES, INC		43880 COMMERCE AVE	HOLLYWOOD	MD	20636
FIRST BREACH, INC		18450 SHOWALTER RD	HAGERSTOWN	MD	21742
KRAVITZ, NEIL S	NSK SALES CO	1600 NORTH MAIN ST	HAMPSTEAD	MD	21074
MARYLAND RELOAD - R- INC		4530 WOODLAWN CT	POMFRET	MD	20675
MOSCHETTO, LOUIS JOHN JR & MICHELINI, MARK ANGELO	GIGI'S GUN SHOP	1805 WESTERN SHORES BLVD	PORT REPUBLIC	MD	206762665
NRL & ASSOCIATES INC		245 LOG CANOE CIR SUITE I	STEVENSVILLE	MD	21666
SABRE FIREARMS GROUP, LLC		1030 W SIDE DR UNIT 28-D	GAITHERSBURG	MD	20878
TEXTRON SYSTEMS CORPORATION		124 INDUSTRY LANE	HUNT VALLEY	MD	21030
VARRECCHIA, THOMAS RALPH	MID MARYLAND GUN REPAIR	11103 HESSONG BRIDGE RD	FREDERICK	MD	21701
A&E ENTERPRISES, LLC	PITBULL FIREARMS	308 CENTREVILLE RD	QUEENSTOWN	MD	21658
A1 UNIFORM SALES CO INC		9592 BALTIMORE AVE	COLLEGE PARK	MD	20740
AB&V LIMITED LIABILITY COMPANY	JCM ARMORY	510 HAVERHILL RD	JOPPA	MD	21085
ACCURATE GUNS & AMMO LLC		28650 POINT LOOKOUT RD	LEONARDTOWN	MD	20650
ADVANCED ORDNANCE LLC	ADVANCED ORDNANCE	21031 SUGAR RIDGE TERRACE	BOYDS	MD	20841
AIM HIGH LLC		12850 JANSCHKE DRIVE	WALDORF	MD	20601
AIM INC		19200 MIDDLETOWN RD	PARKTON	MD	211200000
AIRTEC INC	AIRTEC	44174 AIRPORT RD SUITE 300	CALIFORNIA	MD	20619
ALL AMERICAN MD LLC	LEIM / LEGION RIFLES	42988 FAIRGROUNDS RD	LEONARDTOWN	MD	20650
AMBIMJB LLC	AMBI	3275 RYERSON CIRCLE	BALTIMORE	MD	21227
AMERICAN GUN STORAGE, INC	AMERICAN GUN SALES & STORAGE	1305 SOUTH DIVISION STREET UNIT 2	SALISBURY	MD	21804
ARCHOLON DEFENSE LLC		6655 DOBBIN RD # G	COLUMBIA	MD	21045
ARTHUR, ROBERT SHERMAN	ARTHUR'S SHOOTERS SUPPLY	9234 OLD OCEAN CITY RD	BERLIN	MD	21811
ARUNDEL FIREARMS & PAWN INC		7427 B & A BLVD	GLEN BURNIE	MD	210610000
ATLANTIC GUNS INC		15813 FREDERICK RD	ROCKVILLE	MD	20855
BADWOLF INDUSTRIES INC	OLD WASHINGTON ARMORY	3055 OLD WASHINGTON RD STE 2	WALDORF	MD	20601
BAY COUNTRY GUNS, LLC		3137 SOLOMONS ISLAND RD	EDGEWATER	MD	21037
BAY SILAH LLC	BAY SILAH FIREARMS	18318 BERWICK TERRACE	HAGERSTOWN	MD	21740
BAYSIDE FIREARMS LLC	BAYSIDE FIREARMS	7640 INVESTMENT CT	OWINGS	MD	20736
BENELLI USA CORPORATION		901 8TH STREET	POCOMOKE	MD	21851
BERETTA U S A CORPORATION	BERETTA USA CORP/ BERETTA USA	17601 BERETTA DR	ACCOKEEK	MD	206070000
BFT FIREARMS LLC		44285 RICHEY ROAD	LEONARDTOWN	MD	20650
BIDDLE, JAY CLAYTON	SHORE TACTICAL	3775 VILLAGE TRAIL	SNOW HILL	MD	21863
BLAIR, ARTHUR S	ADVANCED BALLISTICS GUN REPAIR	21 FRONT ST	LONACONING	MD	21539
BMORE TACTICAL LLC		1520 OLD EASTERN AVE	ESSEX	MD	21221
BOO2U LLC		708 N OGLE ST	CHARLESTOWN	MD	21914
BOOMSTICK&PISTOLS, LLC	BSP FIREARMS	902 COLTON CT	PRINCE FREDERICK	MD	20678
BOSWELL, STEVEN P	BOSWELL'S CUSTOM RIFLES	12035 OREBANK RD	CLEAR SPRING	MD	21722
BRGW LLC	BUILT RIGHT GUNWORKS	3203 RIDGE RD	WESTMINSTER	MD	21157

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Federal Firearms Licensees

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LICENSE NAME	BUSINESS NAME	PREMISE STREET	PREMISE CITY	PREMISE STATE	PREMISE ZIP CODE
BROADNECK FIREARMS LLC	BROADNECK FIREARMS	8057 VETERANS HIGHWAY	MILLERSVILLE	MD	21108
BROWNE WORKS, INC		1036 B AND L CLUB RD	PASADENA	MD	21122
BROWNS E ZEE ACRES ENTERPRISES	BROWNS FIREARMS	4037 SCHALK RD 2	MILLERS	MD	21102
CAV MANUFACTURING, LLC	CAV MANUFACTURING	2414 NORTHGATE DRIVE SUITE 3	SALISBURY	MD	21801
CAVALCANTE, PHILIP	CTE FIREARMS	23561 DANIEL FARM LN	HOLLYWOOD	MD	20636
CHANEY, CHRISTOPHER LEE	CC FIREARMS	22024 JEFFERSON BLVD	SMITHSBURG	MD	21783
CINDY'S HOT SHOTS INC		201 HOLSUM WAY	GLEN BURNIE	MD	21060
COCKRUM, CHRIS K	ACCUFORGE	485 GREENWOOD ST	ODENTON	MD	21113
COHERENT TECHNICAL SERVICES, INC	CTSI	43880 COMMERCE AVE	HOLLYWOOD	MD	20636
COLLINS, LARRY KENVATTIA II	BGD ARMS	2628 PEBBLEBROOK TERRACE COURT	WALDORF	MD	20603
COMBAT SHOOTER, INC	FREESTATE GUN RANGE	11500 CROSSROADS CIRCLE SUITE J	MIDDLE RIVER	MD	21220
CONWAY, PETER	PCA	3100 BEAVER LANE	TRAPPE	MD	21673
COVINGTON, GUY PHILLIPS SR		121 DEERFIELD COURT	CENTREVILLE	MD	21617
CUSTOM ANALYTICAL ENGINEERING SYSTEMS INC		13000 TENSOR LN NE	FLINTSTONE	MD	21530
D AND J ENTERPRISES, LLC		919 WELLS AVE	ANNAPOLIS	MD	21403
DANFORD SOLUTIONS LLC		2499 KIMBERLY LN	HUNTINGTOWN	MD	20639
DEFENSE ARCHITECTURE SYSTEMS, INC	DASI	11820 W MARKET PL SUITES M-P	FULTON	MD	20759
DEFENSIVE AND PROTECTIVE SOLUTIONS, LLC	DPS, LLC	8989 HILLARY CT	LA PLATA	MD	20646
DIRTYBORE CUSTOM LLC		546 PROSPECT HILL RD	KNOXVILLE	MD	21758
DOWN RANGE, LLC	DR LLC	13915 SMITHSBURG PIKE	SMITHSBURG	MD	21783
DUFFYS INC	DUFFYS GUN ROOM / DGR	15433 FALLS RD	SPARKS	MD	211520000
DUNBAR, MATTHEW ROBERT	DRONTHEIM BUILD WORKS	7510 CARPENTER STREET	FULTON	MD	20759
EAGLE TACTICAL, LLC		4636 OCEAN GATEWAY	VIENNA	MD	21869
EAKLE FIREARMS, INC		3275 BETHANY LN STE 200	ELICOTT CITY	MD	21042
EASTERN SHORE PRECISION LLC	ESP	31573 MORRIS LEONARD RD	PARSONSBURG	MD	21849
ELTS CONSULTING LLC	PANDA TACTICAL	48372 SUNBURST DR	LEXINGTON PARK	MD	20653
F4 DEFENSE LLC	F4 DEFENSE	21726 GREAT MILLS RD	LEXINGTON PARK	MD	20653
FAR AWAY VENTURES INC	VIGILANT TACTICAL / V-TAC	2441-A MOUNTAIN RD	PASADENA	MD	21122
FJB ENGINEERING COMPANY		1319 BUCHEIMER ROAD	FREDERICK	MD	21701
FOUR-U-FIREARMS, LLC	FOUR-U-FIREARMS	5800 WOODCLIFF ROAD UNIT 108A	BOWIE	MD	20720
FREDS SPORTS & FURNITURE INC	FREDS OUTDOORS	2895 CRAIN HWY	WALDORF	MD	20601
FREESTATE SERVICES LLC	FREETAC	311 CREEK VALLEY LANE	ROCKVILLE	MD	20850
FIS LLC		8009 JUMPERS HOLE RD SUITE H	PASADENA	MD	21122
GCC ENTERPRISES, LLC	CODE 4 ARMS	1021 STANSBURY ROAD	PYLESVILLE	MD	21132
GODDESS ARMS LLC		429 PYSELL ROAD	MC HENRY	MD	21541
GOLDMAN, EDWARD LUTHER	ELG / ELGBMD	10745 UNIT 3 TUCKER STREET	BELTSVILLE	MD	20705
GOOD VIBRATIONS, LLC	GUN CONNECTION	1306 SYLVIA STREET	SALISBURY	MD	21804
GUN METAL INC		11433 PULASKI HWY UNIT 3	WHITE MARSH	MD	21162
GUNDALK WEAPON WORKS LLC		8370 JUMPERS HOLE RD	MILLERSVILLE	MD	21108
GUTTERS FOR LESS INC	GUTTERS FOR LESS	7542 HOLABIRD AVENUE	DUNDALK	MD	21222
HAFER'S GUNSMITHING INC	HAFER'S GUNS / HAFER'S CUSTOM	19530 BEAVERS CREEK RD	HAGERSTOWN	MD	21740
HANOVER ARMORY LLC		15411 NATIONAL PIKE	HAGERSTOWN	MD	21740
HAWKEYE FIREARMS LLC		1327 ASHTON RD STE 5 & 6	HANOVER	MD	21076
HENDERSHOT'S SPORTING GOODS INC	HENDERSHOT'S	903 MILLSTONE CT	BEL AIR	MD	21014
HERMAN, ROYCE ALVA	HERMAN'S	65 WEST MAIN	HANCOCK	MD	21750
HERO QUARTERMASTERS LLC	CENTREVILLE GUNSMITH	213 HOPE RD	CENTREVILLE	MD	21617
HIMMEL INC	HIMMEL	10351 SOUTHERN MARYLAND BLVD SUITES L101 & L102	DUNKIRK	MD	20754
HOLNIKER, CAROLANNE	ARMCO ARMS	932 WASHINGTON AVENUE	CHESTERTOWN	MD	21620
INDIVIDUAL PRODUCTIONS LLC		1732 RIDGE RD	WESTMINSTER	MD	21157
INTERCITY DESIGNS, LLC		4613 FURLEY AVE	BALTIMORE	MD	21206
IZOR, DERRICK	HONORED IRON	3228 BRECKENRIDGE WAY	RIVA	MD	21140
JAMES DENARO LEGAL SERVICES LLC	CIPHERLAW	27292 PORTER DR	MECHANICSVILLE	MD	20659
JAMES LOCKLEAR, LLC	NATIVE CUSTOMS	7801 CADBURY AVE	POTOMAC	MD	20854
JD GRIM TECHNOLOGIES LLC	3G WEAPONRY	2315 ORIENTAL PL	NANJEMOY	MD	20662
JMAC FIREARMS LLC		9032 HOLSEY RD	DAMASCUS	MD	20872
JMJ FIREARMS LLC		19920 ALVA COURT	KEEDYSVILLE	MD	21756
		43979 AIRPORT VIEW DR	HOLLYWOOD	MD	20636

Federal Firearms Licensees

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LICENSE_NAME	BUSINESS_NAME	PREMISE STREET	PREMISE_CITY	PREMISE_STATE	PREMISE_ZIP_CODE
JM1 FIREARMS LLC		29015 THREE NOTCH RD	MECHANICSVILLE	MD	20659
KAIDEN TACTICAL, LLC	KAIDEN TACTICAL	9171 BALTIMORE NATIONAL PIKE	MIDDLETOWN	MD	21769
KEITHS GUNWORKS LLC	KEITHS GUNWORKS	10155 WEEDON RD	NEWBURG	MD	20864
KELLY, CHARLES W JR		1430 TOWN POINT ROAD	CAMBRIDGE	MD	21613
KIDWELL PRECISION WORKS LLC		37266 TANYARD DRIVE	MECHANICSVILLE	MD	20659
KINETIC TAG, INC		1070 HARDEES DRIVE	ABERDEEN	MD	21001
KRAMER, ROBERT ED	REK FIREARMS	1620 HUDSON RD	CAMBRIDGE	MD	21613
LAUDMAN FIREARMS, LLC	LAUDMAN DYNAMICS	2255 CRAIN HWY SUITE 103, OFFICE 1-6	WALDORF	MD	20601
LEDFORD ENTERPRISES LLC	GUNPOWDER TACTICAL	3622 ANDERSON LANE	JARRETTSVILLE	MD	21084
LONG, ZACHARY STEVEN	KINGSTON COATINGS	30047 KINGSTON LANE	WESTOVER	MD	21871
LOPER MACHINE LLC	LOPER MACHINE / NON-MAG	2106 EMMORTON PARK ROAD SUITE 103-104 AND 119-120	EDGEWOOD	MD	21040
LWRC INTERNATIONAL	LWRC INTERNATIONAL	510 NAYLOR MILL ROAD	SALISBURY	MD	21801
M O A INDUSTRIES LLC	MURRAY'S ORDNANCE ARMORY	6295 WHEAT MILLER CT	MOUNT AIRY	MD	21771
MACSORLEY, BRUCE HODGSON II		1620 TOWN PT RD	CAMBRIDGE	MD	21613
MARYLAND SMALL ARMS RANGE INC		9801 FALLARD COURT	UPPER MARLBORO	MD	20772
MAXIMUM DEFENSE LLC		1330 DILLON HEIGHTS AVE	CATONSVILLE	MD	21228
MCKEE, INC	FULTON ARMORY	8725 BOLLIMAN PLACE #1	SAVAGE	MD	207630000
MD ARSENAL, INC	MD ARSENAL	19828 NATIONAL PIKE	HAGERSTOWN	MD	21740
MECHANICSVILLE GUN WORKS LLC		30018 ARBOR HILLS WAY	MECHANICSVILLE	MD	20659
MERRYWEATHER, THOMAS ROBERT	T R M TRADERS	1708 S MILL DR	SALISBURY	MD	21804
METL FAB INC		7340 EXECUTIVE WAY- SUITED	FREDERICK	MD	21704
MILLER, JEFFREY DAVID	CLEAR SPRING GUN SHOP	13708 NATIONAL PIKE STE 1	CLEAR SPRING	MD	21722
MIMS INNOVATIONS, INC	HARFORD ARMORY	1817 MIDSUMMER LANE	JARRETTSVILLE	MD	21084
MOLON LABE FIREARM TRAINERS INC	MLFT	108 PEARL STREET	SNOW HILL	MD	21863
MOORE TACTICAL LLC		17809 TERI DR	DERWOOD	MD	20855
MOUNTAIN FIRE LLC	MOUNTAIN FIRE	516 W MAIN ST	THURMONT	MD	21788
MT UNIVERSAL LLC		5611/5609 KRAFT DR	ROCKVILLE	MD	20852
NANTISTA, JOSEPH	JNC FIREARMS	21700 BEEM LN	LEONARDTOWN	MD	20650
NEXLEVEL DEFENSE SYSTEMS, LLC	NEXLEVEL DEFENSE SYSTEMS	10209 GREEN CLOVER DRIVE	ELLCOTT CITY	MD	210421615
NOWICKI, JONATHAN DANIEL	GUN RUNNERS ARSENAL / IDN	3137 SOLOMON'S ISLAND RD	EDGEWATER	MD	21037
NRL & ASSOCIATES INC		245 LOG CANOE CIRCLE SUITE I	STEVENSVILLE	MD	21666
NRM POWER PRODUCTS LLC	PRECISION BALLISTICS	14212 BRANDYWINE RD	BRANDYWINE	MD	20613
OH MY GUNZ LLC		15801 NORMAN DR	NORTH POTOMAC	MD	20878
OLD LINE ARMAMENT LLC	OLD LINE ARMAMENT, OLD LINE ARMORY	1167 BREITEN COURT	WOODBINE	MD	21797
OPTIMAL ZERO FIREARMS, LLC		17 WEST JEFFERSON STREET SUITE 105 B	ROCKVILLE	MD	20850
OUTDOOR CLASSICS LLC	THOMAS FERNEY BREDA AG	28933 INFORMATION LANE UNIT A	EASTON	MD	21601
PARTRIDGE, ROGER FREDRICK	RPG GUNSMITH	11211 RACE TRACK RD	BERLIN	MD	21811
PASADENA PAWN & GUN LLC	PPG	2515 MOUNTAIN ROAD	PASADENA	MD	21122
PATRIOT FIREARMS TRAINING LLC		913 SNOW HILL RD UNIT C	SALISBURY	MD	21804
PATRIXCORP ENGINEERING LLC		13501 SILENT LAKE DR	CLARKSVILLE	MD	21029
PBPS ARMS LLC	ANTIETAM FIREARMS	35 W BALTIMORE ST	FUNKSTOWN	MD	217340866
PHELPS, JOHN WALTER III		1100 BUTTERWORTH CT	STEVENSVILLE	MD	21666
POLK, WADE KENDALL & EHRSIMAN, TANYA KAYE	KENDALL FIREARMS	5881 POLK LANE	PARSONSBURG	MD	21849
PRACTICAL DEFENSE, LLC	THE ARMORY BY PRACTICAL DEFENSE	748 PRNCPIO RD	PORT DEPOSIT	MD	21904
PRECISION FIREARM SERVICES, LLC		10355 TYDINGS CT	LA PLATA	MD	20646
PRETTYMAN, LOGAN	LPGUNWORKS	8803 BLACK DOG ALY	EASTON	MD	21601
PSG STRATEGIC CORPORATION	PSG ARMORY	32 DALRYMPLE ROAD UNIT 203	SUNDERLAND	MD	20689
RAPID PROTOTYPING & MFG TECHNOLOGIES, LLC	RPM TECH	12 E JARRETTSVILLE ROAD	FOREST HILL	MD	21050
RECOIL ARMS LLC		315 N SPRINGDALE ROAD	WESTMINSTER	MD	21158
RED, WHITE AND BLUE INNOVATIONS, INC	RWB INNOVATIONS, INC	85 SAM EASTMAN RD	OAKLAND	MD	21550
RENTSCHLER, OSCAR THOMAS	OSCAR'S GUN SHOP	32509 DUBLIN RD	PRINCESS ANNE	MD	21853
REPETE, LLC		842 LITTLE EGYPT ROAD	ELKTON	MD	21921
RESILIENT CITIZEN LLC		4615 INNSBRUCK CT	LA PLATA	MD	20646
REVERENCE ARMS LLC		721 C WEST POTOMAC STREET	BRUNSWICK	MD	21716
RHT LLC	RED HILL TACTICAL	13018 PENNSYLVANIA AVE, SUITE H	HAGERSTOWN	MD	21742
RISTON, JOHN T		3881 ROCKS STATION ROAD	STREET	MD	21154
S & J ARMS CO		7512 MAIN ST	SYKESVILLE	MD	217840000

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Federal Firearms Licensees

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LICENSE NAME	BUSINESS NAME	PREMISE STREET	PREMISE CITY	PREMISE STATE	PREMISE ZIP CODE
S AND S GUNS, LLC	S AND S	3252 SOLOMON'S ISLAND RD	HUNTINGTOWN	MD	20639
SAUNDERS, WILLIAM BRADLEY	RACKED N READY	36632 W LAKELAND DR	MECHANICSVILLE	MD	20659
SCHNATMAN, JOHN EDWARD III	JS	7460 ROCKAWALKIN RD	HEBRON	MD	21830
SHINDLE, DAVID SCOTT JR	MARYLAND FIREARMS	3924 NORTH POINT ROAD	BALTIMORE	MD	21222
SHORE ARMORY LLC		245 LOG CANOE CIRCLE SUITE I	STEVENSVILLE	MD	21666
SHOREBILLY SUPPLY LLC		133 BROWNING LANE	CENTREVILLE	MD	21617
SKEETER'S FIREARMS, LLC		21214 JEFFERSON BLVD	SMITHSBURG	MD	21763
SM CUSTOMS LLC	SM CUSTOMS	232 OAKLAND HALL RD	PRINCE FREDERICK	MD	20678
STATELINE GUN EXCHANGE LLC		115 W MAIN ST	EMMITSBURG	MD	21727
SUPPRESSED BALLISTICS LLC		10620 RIGGS HILL RD UNIT G	JESSUP	MD	20794
TABASSI, AMIR H	AMERICAN GUN & ARCHERY OUTLET	5423 RIDGE RD	MOUNT AIRY	MD	21771
TACTICAL DEFENSE ARMS, LLC		605 TRIXSAM ROAD	SYKESVILLE	MD	21784
TEXTRON SYSTEMS CORPORATION		124 INDUSTRY LN	COCKEYSVILLE	MD	21030
TF RETAY, LLC	RETAY USA, KOTA ARMS	28933 INFORMATION LANE UNIT A	EASTON	MD	21601
THE TARLETON GROUP, LLC	RED BARN CERAKOTE	40035 GRANDVIEW ST	MECHANICSVILLE	MD	20659
TIME OFF CHARTERS LLC		1745 FOREST GLEN DR	PRINCE FREDERICK	MD	20678
TMGN LLC	THE MACHINE GUN NEST	7910 REICHS FORD ROAD	FREDERICK	MD	21704
TOMKAT AMMUNITION LLC	TK DEFENSE	18 CESSNA COURT	GAITHERSBURG	MD	20879
TUCKAHOE GUNWORKS & HYDROGRAPHICS LLC	TGH LLC	22065 BEAVEN DR	DENTON	MD	21629
TUSCARORA ENTERPRISES LLC	FREDERICK FIREARMS AND MARYLAND MINUTEMEN	3910 BASFORD RD	FREDERICK	MD	21703
TYLER FIREARMS LLC		4367 HOLLINS FERRY ROAD STE 2C	HALETHORPE	MD	212270000
URBAN DEVELOPMENT SOLUTIONS INC		9932 LIBERTY RD	RANDALLSTOWN	MD	21133
USTINOV, MAXIM	NONSTOP	13776 NIGHT SKY DRIVE	SILVER SPRING	MD	20906
WALKER, BRIAN TODD	WALKER TRAINING & FIREARMS, LLC	630 WHITE CLOUD CT	ELDERSBURG	MD	21784
WALSTON SWITCH GUNS & GEAR LLC	SCSG	7737 WOODBINE RD	WOODBINE	MD	21797
WANTS AND NEEDS, LLC		7149 WALSTON SWITCH ROAD	PARSONSBURG	MD	21849
WATCHMEN TACTICAL, LLC		17785 KEEN'S FRIGHT LN	HENDERSON	MD	21640
WEBSTER, VANCE JAMES JR	WEBSTER WAFFEN WERKS / WWW	417 CREST LN	WESTMINSTER	MD	21157
WHISKEY BARREL FIREARMS LLC		7815 PARSONSBURG RD	PARSONSBURG	MD	21849
WKRUMPE ENTERPRISES, LLC	W&K SALES	7810 TRAELEIGH LN	CHARLOTTE HALL	MD	20622
WLG TRADING LLC		1428 ALLEN WAY	WESTMINSTER	MD	21157
WOLFAND INC	GUNTRY CLUB OF MARYLAND	112 WESTMINSTER RD	REISTERSTOWN	MD	21136
WORTH A SHOT INC		10705 RED RUN BLVD	OWINGS MILLS	MD	211179606
ZEITZ, JOHN GARY JR	WARRIOR ARMAMENT MFG	8424 VETERANS HWY SUITES 8-12	MILLERSVILLE	MD	21108
ZINK ARMS LLC		25309 OAK DRIVE	DAMASCUS	MD	20872
BAY SILAH LLC	BAY SILAH FIREARMS	9512 BELAIR RD	NOTTINGHAM	MD	21236
BENELLI USA CORPORATION		18318 BERWICK TERRACE	HAGERSTOWN	MD	21740
BERETTA USA CORPORATION		17603 INDIAN HEAD HWY	ACCOKEEK	MD	20607
BLACK HAWK ARMORY LLC		17601 BERETTA DR	ACCOKEEK	MD	206070000
CAESAR GUERINI USA LLC	CAESAR GUERINI USA	2 WISCONSIN CIRCLE STE 700	CHEVY CHASE	MD	20815
CALIBER CLUB SHOOTING SPORTS INC	XCAL SHOOTING SPORTS & FITNESS	11240 ALTON RD	CAMBRIDGE	MD	21613
DUFFYS INC	DUFFYS GUN ROOM / DGR	15433 FALLS RD	FREDERICK	MD	21701
ELMECH SYSTEMS LLC	EMS	10587 SOURWOOD AVE	SPARKS	MD	211520000
FABARM USA, LLC	FABARM USA	700 LAKE ST	WALDORF	MD	20603
FIRST BREACH LLC		8402 TOPPING RD	CAMBRIDGE	MD	21613
FRIEDMAN, LARRY B	LTP	9917 STEPHEN DECATUR HWY SUITE #2 & #3	BALTIMORE	MD	21208
GCC ENTERPRISES, LLC	CODE 4 ARMS	1021 STANSBURY ROAD	OCEAN CITY	MD	21842
GREYWOLF INDUSTRIES, LLC		1510 CATON CENTER DRIVE, SUITE F- REAR	PYLESVILLE	MD	21132
GUROZ CORPORATION		782 OAK STUMP DR	BALTIMORE	MD	21227
HENDERSHOT'S SPORTING GOODS, INC		65 W MAIN ST	MILLERSVILLE	MD	21108
JONES SECURITIES LLC		750 MD ROUTE 3 SOUTH SUITE B17	HANCOCK	MD	21750
M CHASE PROPERTIES LLC	GUNS AND AMMO	9295 CLIFFORD DR	GAMBRILLS	MD	21054
MID-ATLANTIC IMPORTS, LLC		3785 WOODBINE RD	WHITE PLAINS	MD	20695
MMB IMPORTS LLC	MMBI	11306 B PLEASANT WALK RD	WOODBINE	MD	21797
OUTDOOR CLASSICS LLC	THOMAS FERNEY BREDA AG	28933 INFORMATION LANE UNIT A	MYERSVILLE	MD	21773
STOEGE INDUSTRIES INC		17603 INDIAN HEAD HWY SUITE 200	EASTON	MD	21601
			ACCOKEEK	MD	20607

2A Maryland

Federal Firearms Licensees

Source: ATF Website <https://www.atf.gov/firearms/listing-federal-firearms-licensees>

LICENSE_NAME	BUSINESS_NAME	PREMISE_STREET	PREMISE_CITY	PREMISE_STATE	PREMISE_ZIP_CODE
TEXTRON SYSTEMS CORPORATION		124 INDUSTRY LANE	COCKEYSVILLE	MD	210300126
TF RETAY, LLC	RETAY USA, KOTA ARMS	28933 INFORMATION LANE UNIT A	EASTON	MD	21601
AVIATION PROCUREMENT SYSTEMS LLC		211 PERRY PARKWAY SUITE 5	GAITHERSBURG	MD	20877
SAFWARE, INC		4403 FORBES BLVD	LANHAM	MD	20706
URBAN DEVELOPMENT SOLUTIONS INC		9932 LIBERTY RD	RANDALLSTOWN	MD	21133
WHITE BALLISTICS LLC		950 PRINCIPIO FURNACE RD	PERRYVILLE	MD	21903
BERETTA USA CORP		17601 BERETTA DR	ACCOKEEK	MD	20607
COHERENT TECHNICAL SERVICES INC	CTSI	43880 COMMERCE AVE	HOLLYWOOD	MD	20636
ENGAGE ARMAMENT LLC		701 E GUIDE DRIVE STE 101	ROCKVILLE	MD	20850
FIFTY60 HEAVY INDUSTRIES LLC		312 LAUREL AVE	LAUREL	MD	20707
LWRC INTERNATIONAL	LWRC INTERNATIONAL	815 CHESAPEAKE DRIVE	CAMBRIDGE	MD	21613
MACHINING TECHNOLOGIES INC	MATECH	510 NAYLOR MILL RD	SALISBURY	MD	21801
MISTRAL INC		FRANKLIN SQ IND CTR 1 10001 FRANKLIN SQ DR SUITE A	BALTIMORE	MD	21236
AVIATION PROCUREMENT SYSTEMS LLC		211 PERRY PARKWAY SUITE 5	GAITHERSBURG	MD	20877
BERETTA USA CORP		17601 BERETTA DR	ACCOKEEK	MD	20607
LWRC INTERNATIONAL	LWRC INTERNATIONAL	815 CHESAPEAKE DRIVE	CAMBRIDGE	MD	21613
MISTRAL INC		7910 WOODMONT AVE	BETHESDA	MD	20814
NTS TECHNICAL SYSTEMS		4603B COMPASS POINT ROAD	BEL CAMP	MD	21017
THALES DEFENSE & SECURITY, INC		22527 GATEWAY CENTER DRIVE	CLARKSBURG	MD	20871

MSI Testimony on HB 577 and SB 713 compelled speec

Uploaded by: Mark Pennak

Position: UNF



President
Mark W. Pennak

February 7, 2025

**WRITTEN TESTIMONY OF MARK W. PENNAK, PRESIDENT,
MARYLAND SHALL ISSUE,
IN OPPOSITION TO SB 577 AND HB 713**

I am the President of Maryland Shall Issue (“MSI”). Maryland Shall Issue is a Section 501(c)(4), all-volunteer, non-partisan, non-profit organization dedicated to the preservation and advancement of gun owners’ rights in Maryland. It seeks to educate the community about the right of self-protection, the safe handling of firearms, and the responsibility that goes with carrying a firearm in public. I am also an attorney and an active member of the Bar of the District of Columbia and the Bar of Maryland. I retired from the United States Department of Justice, where I practiced law for 33 years in the Courts of Appeals of the United States and in the Supreme Court of the United States. I am an expert in Maryland Firearms Law and the law of self-defense. I am also a Maryland State Police certified handgun instructor for the Maryland Wear and Carry Permit and the Maryland Handgun Qualification License (“HQL”) and a certified NRA instructor in rifle, pistol and personal protection in the home and outside the home and muzzle loading. I appear today as President of MSI to provide information in OPPOSITION to the Bill.

The Bill: The Bill adds a new Section 5-901 in the Public Safety Article of the Maryland Code to provide that the Maryland Dept. of Health prepare and distribute to all County health departments in the State literature regarding firearm safety, firearm training, suicide prevention, mental health awareness and conflict resolution. The Bill then directs that each county health department to distribute this literature “to all establishments that sell firearms or ammunition within the county.” The Bill then states that each such establishment “shall” make the literature “visible and available at the point of sale” and “distribute the literature to each person who purchases a firearm or ammunition.” The Bill authorizes representatives from the county health department to issue citations to the establishment for any violation and imposes civil fines of \$500 for the first violation and a fine of \$1000 for any subsequent violation.

The Bill Is A Violation Of the First Amendment

There is no dispute in this Bill requiring dealers to display and distribute this literature created by the State is content-based, compelled speech and is thus “presumptively unconstitutional.” *Nat’l Inst. Of Fam. & Life Advoc. v. Becerra*, 585 U.S. 755, 766 (2018) (“*NIFLA*”). “A speaker’s right to ‘decide what not to say’ is ‘enjoyed by business corporations generally.’” *Moody v. NetChoice, LLC*, 144 S.Ct. 2383, 2410 (2024), quoting *Hurley v. Irish-American Gay, Lesbian and Bisexual Group of Boston*, 515 U.S. 557, 573-74 (1995). Such speech may be compelled under *Zauderer v. Off. of Disciplinary Counsel of Supreme Court of Ohio*, 471 U.S. 626, 628 (1985), **only** if the literature is merely “purely factual and uncontroversial”

“commercial speech.” Under *NIFLA*, *Zauderer* is limited to “purely factual and uncontroversial information about the terms under which . . . services will be available.” *NIFLA*, 585 U.S. at 768-69, quoting *Zauderer*, 471 U.S. at 651. See, e.g. *NetChoice, LLC v. Attorney General, Florida*, 34 F.4th 1196, 1227 (11th Cir. 2022), *remanded on other grounds*, *Moody v. NetChoice, LLC*, 603 U.S. 707 (2024) (holding that that compelled speech under *Zauderer* must be “about their conduct toward their users and the ‘terms under which [their] services will be available’”) (citation omitted).

There are several constitutional aspects to this subject and, for those who wish to conduct a deep dive, these issues are addressed more fully in the attached petition for certiorari and reply brief filed in the Supreme Court in *MSI v. Anne Arundel Co.*, 91 F.4th 238 (4th Cir. 2024), *cert. denied*, 2024 WL 4426600 (U.S. Oct 07, 2024). In the *Anne Arundel County* case, the compelled speech of dealers was sustained with respect to two particular pieces of literature that focused on suicide prevention. No “training” literature was presented and the “firearm safety” page of the literature was limited to safe storage. The Fourth Circuit did not dispute that this literature was not about “the terms under which . . . services will be available” but held that the literature was justified as a label or “safety warning.” The Fourth Circuit also adopted an extremely expansive view of “commercial speech” which is contrary to controlling precedent. See *Central Hudson Gas & Elec. Corp. v. Pub. Serv. Comm’n of N.Y.*, 447 U.S. 557, 561 (1980) (holding that commercial speech means an “expression related solely to the economic interests of the speaker and its audience”).

The Supreme Court denied review undoubtedly to allow the issue to “percolate” in the lower courts. That is standard practice by the Court. MSI believes strongly that the *Anne Arundel County* case misapplied *NIFLA* and *Central Hudson* and was wrongly decided by the Fourth Circuit. We are committed to pursuing this issue further in an appropriate case. Indeed, the Fourth Circuit’s First Amendment jurisprudence is currently before the Supreme Court in *Mahmoud v. McKnight*, 102 F.4th 191 (4th Cir. 2024), *cert. granted sub nom. Mahmoud v. Taylor*, No. 24-297, 2025 WL 226842 (Jan 17, 2025). That case involves Montgomery County’s compelled education of children in the County’s schools on LGB/PQ topics over the objections of parents. Certiorari was probably granted to reverse.

These sorts of bills compelling dealer speech have very recently been enacted in New York and in California and those statutes will undoubtedly be challenged in due course. If a conflict in the circuits emerges, the Supreme Court will likely then review the First Amendment issues. And the scope of *Zauderer* is an open question and may arise in other kinds of cases as well. That issue is now pending in two circuits (the 11th Circuit and the 5th Circuit) on remand from the Supreme Court’s decision in *Moody v. NetChoice, LLC*, 603 U.S. 707, 727 n.3 (2024) (noting that *Zauderer* should be addressed on remand). Suffice it to say this issue is still unresolved. See *Borgner v. Florida Bd. of Dentistry*, 537 U.S. 1080 (2002) (Thomas, Ginsburg, JJ., dissenting from a denial of certiorari) (noting that “guidance” was needed on this issue).

But even under the Fourth Circuit’s wrong-headed approach, the constitutionality of the compelled speech authorized by this Bill will turn on a case-by-case examination of the content of the literature that is compelled. If the literature is not “purely factual and uncontroversial” it will be challenged and struck down. That test is strict. “Purely factual” and “uncontroversial” are distinctly different terms and cannot be collapsed into a single inquiry. The test for “controversial” speech focuses on the topic of the speech, not on whether individual statements in the literature are factually accurate. See *National Ass’n of Wheat Growers v. Bonta*, 85 F.4th 1263, 1277-78 (9th Cir. 2023); *X Corp. v. Bonta*, 116 F.4th 888 (9th Cir. 2024). *Wheat Growers*, for example, looked to “the topic of the disclosure and its effect on the speaker” to determine “whether something is subjectively controversial.” 85 F.4th at 1277. Similarly, in *NIFLA*, the Supreme Court struck down the compelled notices and rejected *Zauderer* not only because the notices pertained to third-party services (not services rendered by the seller) but also because the notices concerned abortion which, the Court held, was “anything but an ‘uncontroversial’ topic.” 585 U.S. at 769. There was no dispute that the “content” of the compelled notices in *NIFLA* was factually accurate but that did not matter. “Gun control” is a highly controversial topic that cannot be advanced through compelled speech. Compelled speech motivated by anti-gun ideology will not pass muster.

“Factually accurate” is likewise a strict standard. Technically true, but misleading speech is impermissible. As the Ninth Circuit explained in *Wheat Growers*, “a statement may be literally true but nonetheless misleading and, in that sense, untrue.” 85 F.4th at 1276. Thus, even “literally true” speech cannot be compelled where it is “nonetheless misleading.” 85 F.4th at 1279. For example, statements that are supported only by correlation are not “factually accurate.” See, e.g., *United States v. Valencia*, 600 F.3d 389, 425 (5th Cir.), *cert. denied*, 562 U.S. 893 (2010) (“Evidence of mere correlation, even a strong correlation, is often spurious and misleading when masqueraded as causal evidence.”). See also *Free Speech Coalition, Inc. v. Paxton*, 95 F.4th 263, 282 (5th Cir. 2024), *cert. granted on other grounds*, 144 S.Ct. 2714 (July 02, 2024). (dismissing the State’s evidence of a “correlative relationship” as insufficient).

Before subjecting the State and the counties to the costs imposed by this Bill (including potential litigation costs), the Committee should wait for these issues to shake out in the federal courts. Indeed, the Supreme Court may have something to say about these sorts of First Amendment issues in *Free Speech Coalition*, which was argued before the Supreme Court on January 15, 2025. Compelled speech is likewise at issue in *Mahound*, which may likewise be decided this Term. Such subsequent Supreme Court decisions can easily provide a basis for a direct challenge to the Fourth Circuit’s decision in the *Anne Arundel* case in a new lawsuit with different named dealers as plaintiffs. Similarly, if the compelled literature created and distributed by the Department of Health is not “purely factual and uncontroversial” it will be challenged.

Coerced Speech Will Be Resisted And Is Counter Productive.

Whatever the constitutional merits of this Bill, the practical reality is that dealers will object to being commandeered as mouthpieces for what will be seen as the

State's anti-gun political agenda. The Bill compels the dealers to display and distribute this speech, but the Bill does not (and cannot constitutionally) prohibit the dealers from engaging in First Amendment protected speech about the compelled literature. The dealers are thus free to put a trash bin next to the counter and invite their customers to toss the literature upon receipt. Many (if not most) customers will do exactly that, especially after the dealers inform them that the literature is being forced on them by the State. The compelled literature will be widely regarded as a new front in the cultural war and thus will spectacularly backfire. Compelled receipt will be rejected simply because it is compelled.

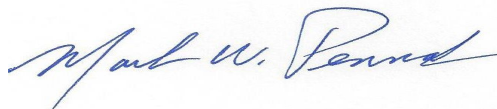
In short, the literature will be thrown away unread, and the State Department of Health will be stuck with the costs of printing and distributing this material to the counties to no point at all. The time and effort the counties will expend in redistributing this literature and enforcing the Bill's requirements will likewise be wasted. Such costs are a misallocation of scarce resources, especially now given the State's need to cut costs in order to reach a balanced budget. If the State truly wishes to communicate with the dealers' customers (rather than virtue-signal), then the display and distribution of literature must be purely voluntary. The State should try to persuade the dealers rather than threatening them with large fines and harassment. Customers buying firearms tend to trust dealers. If the literature is supported by the dealers, the State's message is much more likely to be heard. But no dealer wants to be seen as a puppet for the State or likes being threatened with heavy fines. The overwhelming majority of dealers will not willingly cooperate with the State's compelled speech program being imposed on them against their will. Compliance, if any, will be minimal and *pro forma*. Rural counties in this State are unlikely to assign priority to the distribution of the State's compelled speech or enforcing the display and distribution requirements.

The State Should Preempt Localities

If the State wishes to go ahead with this compelled speech program, then the State should preempt localities from imposing their own compelled speech on top of the State's compelled speech. Currently, both Anne Arundel County and Montgomery County have passed local legislation that requires dealers to display and distribute this sort of literature and those counties are widely seen as vehemently "anti-gun." See Anne Arundel County Code, § 12-6-108, Montgomery County Code, § 57-11A. Other urban counties, seen as equally "anti-gun," will likely follow suit. Without preemption, dealers will be subject to multiple sets of literature that may well conflict or be inconsistent. There is no need to coerce dealers from both the State and the localities. Doing so just invites more lawsuits.

We urge an unfavorable report.

Sincerely,



Mark W. Pennak
President, Maryland Shall Issue, Inc.

mpennak@marylandshallissue.org

No. 23-____

IN THE
Supreme Court of the United States

MARYLAND SHALL ISSUE, INC.; CINDY'S HOT SHOTS, INC.;
FIELD TRADERS LLC; PASADENA ARMS LLC; AND
WORTH-A-SHOT, INC.,

Petitioners,

v.

ANNE ARUNDEL COUNTY, MARYLAND,

Respondent.

**On Petition for Writ of Certiorari to the
United States Court of Appeals
for the Fourth Circuit**

PETITION FOR WRIT OF CERTIORARI

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Counsel for Petitioners

May 17, 2024

QUESTIONS PRESENTED

At issue in this case is a local ordinance, Bill 108-21 (“the Ordinance”) enacted by Anne Arundel County, Maryland (“the County”). That Ordinance compelled sellers of firearms and/or ammunition in the County to display in their retail establishments and distribute, with each such sale of a firearm or ammunition, literature created or adopted by the County concerning, *inter alia*, “suicide prevention” and “conflict resolution.” There is no dispute in this case that the County’s forced display and distribution requirement is content-based, compelled speech and is thus “presumptively unconstitutional.” *Nat’l Inst. of Fam. & Life Advoc. v. Becerra*, 585 U.S. 755, 766 (2018) (“*NIFLA*”). Yet, the court of appeals held that the compelled speech mandated by the County’s Ordinance was nonetheless constitutional under *Zauderer v. Off. of Disciplinary Couns. of Supreme Ct. of Ohio*, 471 U.S. 626, 628 (1985), because, in the court’s view, the literature is merely “purely factual and uncontroversial” “commercial speech” and thus could be compelled under *Zauderer*. The court of appeals likewise affirmed the district court’s exclusion of Petitioners’ expert testimony that demonstrated that the compelled speech was not “purely factual and uncontroversial” information, holding that this exclusion was within the district court’s discretion. The issues presented are:

1. Whether the court of appeals impermissibly allowed the County to violate Petitioners’ First Amendment right “to remain silent,” as reaffirmed in *303 Creative LLC v. Elenis*, 600 U.S. 570 (2023), by holding that the County’s Ordinance compelling retail establishments to display and distribute the County’s literature

was constitutional under *Zauderer*, as construed and limited by *NIFLA*, where there is no dispute that nothing in the compelled literature is “about the terms under which ... services will be available” within the meaning of *Zauderer* and *NIFLA*.

2. Whether the court of appeals failed to apply the correct legal standard in holding that the County’s “suicide prevention” and “conflict resolution” literature was “commercial speech,” merely because the Ordinance applied to sales at retail establishments and thus could be compelled under *Zauderer*’s relaxed scrutiny test without regard to the standard for “commercial speech” set forth in *Central Hudson Gas & Elec. Corp. v. Pub. Serv. Comm’n of N.Y.*, 447 U.S. 557 (1980).
3. Whether the court of appeals erred in holding that the County’s suicide prevention and conflict resolution literature was “purely factual and uncontroversial” under *Zauderer*, where it is undisputed that the supposed link between suicide and access to firearms set forth in the literature is supported only by a correlation and was disputed by Petitioners’ expert witness as “probably false.”
4. Whether the court of appeals erred under *General Electric Co. v. Joiner*, 522 U.S. 136 (1997), and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), in holding that a district court may exclude otherwise admissible expert witness testimony purely because the trial court disagreed with the expert’s reading of the County’s literature.

PARTIES TO THE PROCEEDINGS

Petitioner Maryland Shall Issue, Inc., is a not-for-profit, all-volunteer, non-partisan, Section 501(c)(4) Maryland corporation dedicated to the preservation and advancement of gun owners' rights in Maryland. The other Petitioners are Cindy's Hot Shots, Inc.; Field Traders, LLC; Pasadena Arms, LLC; and Worth-A-Shot, Inc., all of which are or were federal firearms licensees ("FFLs") located in Anne Arundel County, Maryland. They were plaintiffs in the district court and plaintiffs-appellants in the court of appeals.

The Respondent is Anne Arundel County, Maryland, which was the defendant in the district court and defendant-appellee in the court of appeals.

CORPORATE DISCLOSURE STATEMENT

Pursuant to this Court's Rule 29.6, Petitioners state that Petitioner Maryland Shall Issue, Inc., has no parent corporation and no publicly held company owns 10 percent or more of its stock. The remaining Petitioners are privately held Maryland corporations. Each of these corporations has no parent corporation and no publicly held corporation owns 10 percent or more of their stock.

LIST OF RELATED PROCEEDINGS

Pursuant to this Court's Rule 14.1(a)(iii), Petitioners state that there are no "directly related" proceedings pending in this Court or in other state or federal court, as the term is defined by that Rule. The same or similar First Amendment issues are pending before this Court in *Moody v. NetChoice, LLC*, No. 22-277, *cert. granted*, 144 S.Ct. 478 (Sept. 29, 2023), and *NetChoice, LLC v. Paxton*, No. 22-555, *cert. granted*,

144 S.Ct. 477 (Sept. 29, 2023), which were argued to this Court on February 26, 2024.

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PETITION FOR WRIT OF CERTIORARI

Petitioners Maryland Shall Issue, Inc., Field Traders LLC, Cindy's Hot Shots, Inc., Pasadena Arms, LLC, and Worth-A-Shot, Inc., respectfully petition this Court for a Writ of Certiorari to review the judgment of the United States Court of Appeals for the Fourth Circuit.

OPINIONS BELOW

The Fourth Circuit's opinion is reported at 91 F.4th 238 and reproduced at Pet.App. 3a. The order denying rehearing and rehearing en banc is reprinted at Pet.App. 62a. The district court's opinion is reported at 662 F.Supp.3d 557 and is reproduced at Pet.App. 26a-62a.

JURISDICTION

The Fourth Circuit issued its opinion on January 23, 2024. Pet.App. 3a. Petitioners filed a timely petition for rehearing, which the court denied on February 21, 2024. Pet.App. 62a. This Court has jurisdiction under 28 U.S.C. §1254(1).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The Free Speech Clause of the First Amendment, U.S. Const. Amend. 1, provides that "Congress shall make no law * * * abridging the freedom of speech, or of the press." Bill 108-21 amended Anne Arundel County Code, Article 12, Title 6, § 12-6-108, to provide:

(A) Duties of Health Department. The Anne Arundel County Health Department shall prepare literature relating to gun safety, gun training, suicide prevention, mental health, and conflict

resolution and distribute the literature to all establishments that sell guns or ammunition.

(B) Requirements. Establishments that sell guns or ammunition shall make the literature distributed by the Health Department visible and available at the point of sale. These establishments shall also distribute the literature to all purchasers of guns or ammunition.

(C) Enforcement. An authorized representative of the Anne Arundel County Health Department may issue a citation to an owner of an establishment that sells guns or ammunition for a violation of subsection 8(b). Pet.App. 83a.

Bill 108-21 also provided that “a violation of this section is a Class C civil offense pursuant to § 9-2-101 of this code.” *Id.* A Class C civil offense under Section 9-2-101 of the Anne Arundel County Code is punishable by a fine of “\$500 for the first violation and \$1,000 for the second or any subsequent violation.”

STATEMENT OF THE CASE

A. Statutory Background and Procedural History

In their Complaint filed April 11, 2022 (Pet.App. 65a), Petitioners challenged the constitutionality of Anne Arundel County Bill 108-21 (“the Ordinance”), on First Amendment grounds. Bill 108-21 was enacted into law by Respondent, Anne Arundel County, Maryland (“the County”), on January 10, 2022, with an effective date of April 10, 2022. Complaint ¶ 1. Pet.App. 66a. The Ordinance requires the County to “prepare literature relating to gun safety, gun training, suicide prevention, mental health, and conflict resolution and distribute the literature to all

establishments that sell guns or ammunition.” It further requires “[e]stablishments that sell guns or ammunition” to make the County’s literature “visible and available at the point of sale” and to “distribute the literature to all purchasers of guns or ammunition.”

Petitioner Maryland Shall Issue, Inc. (“MSI”) is a Section 501(c)(4), non-partisan, all-volunteer, membership advocacy organization devoted to the protection of gun owners’ rights in Maryland. Pet.App. 69a-70a. The other Petitioners are federally and State licensed firearms dealers located in Anne Arundel County, Maryland (“the dealers”). Pet.App. 71a-74a. Each of the dealers is a member of MSI. The Respondent is Anne Arundel County and is one of 23 counties in Maryland. Pet.App. 75a.

The County implemented the Ordinance by requiring firearms dealers in the County to distribute two pieces of literature. The first is a pamphlet entitled “Firearms and Suicide Prevention” published jointly by the National Shooting Sports Foundation and the American Foundation for Suicide Prevention (“the suicide pamphlet”). Pet.App. 85a. This pamphlet states that “Some People are More at Risk for Suicide than Others” and includes within that category people who have “Access to lethal means, including firearms and drugs.” Pet.App. 88a. On the same page, the pamphlet states that “Risk factors are characteristics or conditions that increase the chance that a person may try to take their life.” *Id.* The “conflict resolution” pamphlet (Pet.App. 93a) consists of a list of County and other third-party resources available for peaceful “conflict resolution.” Under the Ordinance, only firearms dealers and ammunition vendors are required

to display and distribute the County's literature. Pet.App. 83a.

Petitioners objected to being forced to distribute the County's literature, asserting in the Complaint that "Bill 108-21 constitutes 'compelled speech' in violation of the dealers' First Amendment rights." Pet.App. 67a. Petitioners specifically disagreed with the statement set forth in the suicide pamphlet that asserts that mere "access" to firearms is a "risk factor" for suicide. Pet.App. 88a. Petitioners also disagreed with the implied messages sent by the County's literature, including the implicit suggestion that "the public should not buy guns because they cause suicides." Pet.App. 11a. See also 55a-56a n.8.

Petitioners' expert, Prof. Gary Kleck, is a renowned expert in suicide and firearms. Pet.App. 115a. Prof. Kleck focused on "the suicide pamphlet" in his expert report, stating:

[T]he County, via this pamphlet, is claiming that access to firearms causes an increased chance of a person committing suicide. This assertion will be hereafter referred to as 'the suicide claim.' It is my expert opinion that the suicide claim is not supported by the most credible available scientific evidence and is probably false. Pet.App. 118a.

He further states in his expert report that "[t]he suicide claim is contradicted by much of the available scientific evidence and is indisputably *not* purely factual and uncontroversial information." *Id.*

Prof. Kleck elaborated on these points in his videotaped deposition,¹ testifying: "The point that it

¹ A copy of the video was made available to the district court and court of appeals via a Dropbox link, <https://bit.ly/3K6gOSF>.

[the suicide pamphlet] conveyed that was relevant to my expert witness report was that guns -- this pamphlet effectively states that possession of a gun or ownership of a gun increases the likelihood one will commit suicide.” Pet.App. 101a. At a later point in the deposition, Prof. Kleck explained:

Q. Okay. Where on this page is the statement that you evaluated for purposes of your report?

A. First of all, the title of the page as a whole, as you said, Some People Are More At Risk For Suicide Than Others, that introduces the topic of risk factors, which is reinforced in the lower right text, which reads, “Risk factors are characteristics or conditions that increase the chance that a person may try to take their life.” That’s unambiguously an assertion about causal effects.

Pet.App. 105a.

As Prof. Kleck further noted, “implicit in the notion that owning a gun is a risk factor for suicide, and any reader would think suicide is a bad thing, then the implication is – the recommendation implied is don’t own a gun.” Pet.App. 95a.

B. The District Court’s Decision

Petitioners and the County submitted cross-motions for summary judgment. Petitioners’ motion was supported by the verification declarations of each of the Petitioners, the expert witness report of Prof. Kleck (Pet.App. 116a), the interrogatories answers submitted by each Petitioner, portions of the deposition transcriptions of each Petitioner and the

Excerpts from the deposition transcript are in the Appendix. Pet.App. 94a.

videotape and transcript of Prof. Kleck's deposition. Pet.App. 55a n.8. The County's cross-motion was supported by the reports of two purported experts and numerous exhibits.

In their motion, Petitioners contended that the Ordinance imposed content-based, compelled speech on the dealers, and was thus presumptively unconstitutional under *Nat'l Inst. of Fam. & Life Advocs. v. Becerra*, 585 U.S. 755 (2018) ("*NIFLA*"), and other controlling case law. Petitioners also contended that the County's literature was not "commercial speech" and that the literature was not "purely factual and uncontroversial" within the meaning of *NIFLA* and *Zauderer*. In response, the County made no attempt to carry the burdens demanded by strict scrutiny, arguing in their motion for summary judgment that the County need only satisfy what it characterized as the "rational basis" test of *Zauderer v. Off. of Disciplinary Couns. of Supreme Ct. of Ohio*, 471 U.S. 626, 628 (1985). DCT Dkt. # 43-1 at 11,15-16.

In assessing this record, the district court agreed with Petitioners that the County's literature was content-based compelled speech and thus presumptively unconstitutional. Pet.App. 45a. But rather than apply that presumption, the district court held that the literature was commercial speech that could be compelled under *Zauderer*. Pet.App. 45a-46a, 50a-51a. The district court also held that the County's literature asserted only a correlative effect between suicide and firearms, rather than a causal effect, and that assertion of a "correlative relationship" was both "purely factual" and "uncontroversial" under *Zauderer*. Pet.App. 56a-57a. On that sole basis, the district court excluded the expert witness testimony and report of Prof. Kleck, which the court found

would have been otherwise “admissible.” Pet.App. 54a. Having excluded Prof. Kleck’s testimony, the district court granted summary judgment to the County and denied plaintiffs’ motion for summary judgment. Pet.App. 62a-63a.

C. The Fourth Circuit’s Decision

The court of appeals affirmed. The court likened the suicide pamphlet to warnings that “gun owners should store guns safely, especially to prevent misuse and child access.” Pet.App. 14a, citing 27 C.F.R. § 478.103; N.C. Gen. Stat. § 14-315.2; Fla. Stat. § 790.175; Tex. Penal Code Ann. § 46.13(g). In so holding, the court construed *Zauderer* to hold that “compelled commercial speech is constitutional under the First Amendment so long as (1) it is ‘purely factual and uncontroversial’; (2) it is ‘reasonably related to the State’s interest in preventing deception of consumers’; and (3) it is not ‘unjustified or unduly burdensome.’” Pet.App. 15a, quoting *Zauderer*, 471 U.S. at 651. In the court’s view, *Zauderer* was not limited to preventing deception, but also encompassed compelled speech relating to “other government interests” such as protecting “human health” and “labelling requirements.” *Id.* at 15a-16a. The court thus rejected Petitioners’ argument that the relaxed scrutiny permitted by *Zauderer* is limited to compelled speech “about the terms under which ... services will be available” by the speaker.

The court of appeals then turned to the meaning of “commercial speech,” holding that while the County’s literature did not “propose a commercial transaction” the suicide pamphlet was nonetheless commercial speech solely because the literature required Petitioner dealers “to provide the specified literature in connection with the sales of firearms and ammunition to purchasers, which are commercial transactions.”

Pet.App. 18a. The court acknowledged that *Zauderer* required that the speech be purely factual and uncontroversial but held that these requirements were satisfied because the suicide pamphlet did not assert a causal relationship but only that access to firearms was “a ‘risk factor’ that increases ‘the chance’ of suicide.” *Id.* at 20a. The court also acknowledged that the suicide pamphlet “does state that access to guns increases the risk of suicide because guns are the primary means for committing suicide.” *Id.* at 20a-21a. The court ruled that “[t]his, however, is merely a logical syllogism: If guns are the primary means of suicide and if guns are not accessible to persons with suicidal ideation, then the number of suicides would likely decline.” *Id.* at 21a.

Finally, the court of appeals sustained the district court’s decision to exclude the testimony of Petitioners’ expert, reasoning that “[w]e agree with the district court that Dr. Kleck’s opinion that the pamphlet was not factual and was controversial was predicated on his reading of the pamphlet as asserting that firearms cause suicide.” *Id.* at 24a. In the court’s view, the suicide pamphlet was good policy because it informed “purchasers of the nature, causes, and risks of suicides and the role that guns play in them.” *Id.* at 25a. The court believed that the pamphlet was merely “a public health and safety advisory that does not discourage the purchase or ownership of guns,” and that “gun dealers might well find it admirable to join the effort.” *Id.*

REASONS FOR GRANTING THE PETITION

1. *NIFLA* held that *Zauderer* is expressly limited to commercial speech that is “purely factual and uncontroversial information about the terms under which ... services will be available” and “does not apply outside of these circumstances.” *NIFLA*, 585 U.S. at 768-69, quoting *Zauderer*, 471 U.S. at 651. In so holding, *NIFLA* relied on *Hurley v. Irish-American Gay, Lesbian and Bisexual Group of Boston*, 515 U.S. 557, 575 (1995), where the Court stated “[a]lthough the State may at times ‘prescribe what shall be orthodox in commercial advertising’ by requiring the dissemination of ‘purely factual and uncontroversial information,’ outside that context it may not compel affirmance of a belief with which the speaker disagrees.” (Citation omitted).

These limitations are consistent with this Court’s holding in *Milavetz, Gallop & Milavetz, P.A. v. United States*, 559 U.S. 229, 250 (2010), that an “essential feature[]” of *Zauderer* is that the “required disclosures” were “intended to combat the problem of inherently misleading commercial advertisements.” As *NIFLA* and *Hurley* make clear, *Zauderer* does not permit the government to compel speech where, as here, the regulated person merely seeks to remain silent. It is well established that the right not to speak is constitutionally protected. *303 Creative*, 600 U.S. at 586 (“Nor does it matter whether the government seeks to compel a person to speak its message when he would prefer to remain silent or to force an individual to include other ideas with his own speech that he would prefer not to include.”), citing *Hurley*, 515 U.S. at 568-570. See also *Riley v. Nat’l Fed’n of the Blind of N.C., Inc.*, 487 U.S. 781, 797-98 (1988).

Here, there is no dispute that nothing in the compelled literature is “about the terms under which ... services will be available” within the meaning of *Zauderer* and *NIFLA*. Petitioners do not provide “suicide prevention” or “conflict resolution” services. Such services are provided by third parties, including those listed in the suicide pamphlet (Pet.App. 92a) and the “conflict resolution” pamphlet (Pet.App. 93a).

2. The literature likewise does not relate to “commercial advertisements,” or any speech otherwise undertaken by the dealers. The Ordinance’s display and distribution requirements apply regardless of whether the dealers advertise or even speak. Rather, the court of appeals held that the County’s literature was “commercial speech” *solely* because it provided “warnings of risks and proposed safety steps with respect to firearms sold by gun dealers in commercial establishments.” Pet.App. 18a.

In the court of appeals’ view, it was irrelevant that the literature did not propose a commercial transaction or relate to the economic interests of the dealers or their customers, the hallmarks of “commercial speech” as defined in *Central Hudson*. *Id.* at 17a. That the dealers merely desired to remain silent about suicide prevention and conflict resolution was similarly irrelevant to the court. These holdings conflict with *Central Hudson*, *Zauderer*, *NIFLA*, *303 Creative* and *Brown v. Entertainment Merchants Ass’n*, 564 U.S. 786, 800-02 (2011). *NIFLA* expressly held that *Zauderer* cannot be applied to compel disclosure of third-party services, such as those listed in both the suicide pamphlet and the conflict resolution pamphlet. *NIFLA*, 585 U.S. at 769. *303 Creative* and *Brown* both struck down compelled speech in a commercial context and *303 Creative* expressly

ruled that a commercial context does not “make[] a difference” in the scope of First Amendment protection against compelled speech. 600 U.S. at 594.

3. A second “essential feature” of *Zauderer* is that the compelled speech must be “purely factual and uncontroversial.” The Fourth Circuit failed to apply the correct legal standard and, under correct test, the literature compelled by the County is neither. The suicide pamphlet factually asserts that persons with mere “access” to a firearm “are more at risk for suicide than others” and is a “risk factor” that “increase[s] the chance that a person may try to take their life.” Pet.App. 88a (emphasis added). Yet, it is undisputed that factual assertion is supported by no more than correlative evidence. That factual assertion was disputed by Petitioners’ expert as “probably false” and highly controversial. *Id.* at 118a-120a. At a minimum, the statement is highly misleading to any reasonably objective reader. Such reliance on correlative evidence was expressly rejected as insufficient in the First Amendment context by this Court in *Brown*. The court of appeals simply ignored *Brown*.

4. The Fourth Circuit’s affirmance of the district court’s exclusion of Petitioners’ expert is also at war with the limited scope of the district court’s discretion recognized in *General Electric Co. v. Joiner*, 522 U.S. 136, 143 (1997), and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579, 595 (1993). The issue is whether a reasonable person could read the suicide pamphlet as asserting such a causal connection, a test that neither the district court nor the court of appeals ever purported to apply. That is a matter for the fact finder, and the expert’s reading of the literature is admissible for consideration by the fact finder. That evidence cannot be excluded under *Daubert*’s “gate-

keeping” function merely because the district court disagreed with the expert. The holdings of the court of appeals and the district court conflict with *Daubert* and *Joiner* and otherwise warrant the exercise of this Court’s supervisory power under Rule 10 of this Court’s Rules.

5. The First Amendment issues presented by this Petition have split the courts of appeals in multiple ways and are obviously far reaching and important. In particular, the Fourth Circuit’s decision is so erroneous and is so rife with potential for abuse that summary reversal is warranted. At a minimum, this Court should hold this petition pending a decision in *Moody v. NetChoice, LLC*, No. 22-277, and *NetChoice, LLC v. Paxton*, No. 22-555, both of which were argued February 26, 2024. The scope of *Zauderer* and *303 Creative* is squarely presented in both cases, and it is likely that the Court will provide controlling guidance in its decision and thus warrant either summary reversal or a GVR in this case. The Court should thus either grant plenary review or summarily reverse. Alternatively, the Court should hold this petition pending a decision in the *NetChoice* litigation. See S. Shapiro, *et al.*, *Supreme Court Practice*, §4.16 at 4-49-4-50, §6.31(e) at 6-126 (11th ed. 2019).

I. THE DECISION BELOW DIRECTLY CONFLICTS WITH THIS COURT’S FIRST AMENDMENT PRECEDENTS

“At the heart of the First Amendment lies the principle that each person should decide for himself or herself the ideas and beliefs deserving of expression, consideration, and adherence.” *Turner Broadcasting System, Inc. v. FCC*, 512 U.S. 622, 641 (1994). As this Court recently stated, “our ‘leading First Amendment precedents ... have established the principle that

freedom of speech prohibits the government from telling people what they must say.” *303 Creative*, 600 U.S. at 596, quoting *Rumsfeld v. Forum for Academic & Institutional Rights, Inc.*, 547 U. S. 47, 61-62 (2006). See also *Pacific Gas and Elec. Co. v. Public Utilities Com’n of California*, 475 U.S. 1, 10-11 (1986); *Janus v. AFSCME*, 585 U.S. 878, 891-92 (2018). “[T]his general rule, that the speaker has the right to tailor the speech, applies not only to expressions of value, opinion, or endorsement, but equally to statements of fact the speaker would rather avoid.” *Hurley*, 515 U.S. at 573.

A. The Fourth Circuit’s Decision Conflicts With *NIFLA*, *Hurley*, *303 Creative* and Other Decisions Of This Court

The Fourth Circuit’s application of *Zauderer* directly conflicts with express limitations imposed on *Zauderer* by this Court in *NIFLA*, limitations that the court ignored. Under *NIFLA*, *Zauderer* is limited to “purely factual and uncontroversial information *about the terms under which . . . services will be available.*” *NIFLA*, 585 U.S. at 768-69, quoting *Zauderer*, 471 U.S. at 651 (emphasis added). *NIFLA* reiterated the Court’s prior holding in *Hurley* that “*Zauderer does not apply* outside of these circumstances.” *Id.* at 769 (emphasis added). It is undisputed that nothing in the County’s literature is “about the terms under which services will be available” by the dealers. If the Court meant what it said in *NIFLA* and *Hurley* about the limits of *Zauderer*, then summary reversal would be appropriate for that reason alone. See Shapiro, ch.5.12(a) at 5-36. That holding would resolve this case.

Zauderer is premised on the notion that the government may compel speech relating to “the terms

of service” to prevent the commercial entity from misleading or deceiving the public through speech otherwise voluntarily undertaken by the speaker. Thus, in *United States v. United Foods*, 533 U.S. 405, 416 (2001), the Court noted that the compelled speech in *Zauderer* applied to attorneys “who advertised by their own choice” and thus involved “voluntary advertisements.” In *Milavetz*, the Court stated that “required disclosures are intended to combat the problem of inherently misleading commercial advertisements.” 559 U.S. at 250. *Zauderer*’s holding and rationale cannot possibly apply where, as here, the commercial entity is not otherwise voluntarily speaking about the matters on which the County has compelled speech. In such circumstances, *303 Creative* is controlling, not *Zauderer*.

In ignoring the limits placed on *Zauderer* by *NIFLA* and *Hurley* and holding that the government may compel speech that is completely unrelated to any speech otherwise being undertaken by the dealers, the court of appeals impermissibly expanded *Zauderer* far beyond its bounds. Under the court’s ruling, the government may compel, as commercial speech, the display and distribution of the government’s literature by any commercial entity that sells a product related to a policy that the government wishes to promote. This Court has never applied *Zauderer* in such a manner.

Indeed, in both *303 Creative* and *Brown* the compelled speech at issue directly applied to products or services being sold commercially, and yet in both cases, the Court found that the compelled speech was unconstitutional under strict scrutiny without applying *Zauderer*. As the Fifth Circuit recently explained, *Zauderer* was not applied in *303 Creative* “because

that case [*303 Creative*] dealt not with disclosures about the terms under which the service was available, *but instead with compelling those services.*” *R J Reynolds Tobacco Co. v. FDA*, 96 F.4th 863, 875 n.33 (5th Cir. 2024) (emphasis added). That distinction also explains the result in *Brown*, which likewise never cited *Zauderer* in holding that the commercial speech there at issue (warnings on the sales of video games) could not be compelled under strict scrutiny. That the compelled speech takes place in a commercial context does not “make[] a difference.” *303 Creative*, 600 U.S. at 594.

In this case, as in *303 Creative* and *Brown*, the County is not compelling disclosures about the “terms of service.” It is instead “compelling those services” by requiring Petitioners to display and distribute the County’s pamphlets, both of which endorse the services of third parties (Pet.App. 92a, 93a) and are intended to promote governmental policies (suicide prevention and peaceful conflict resolution). Those policies have nothing to do with any services rendered by the dealers. If allowed to stand, the court of appeals’ decision will eviscerate the First Amendment protections recognized in *303 Creative* and *Brown* by abrogating the right of commercial entities not to speak on matters having nothing to do with their terms of services. Remarkably, the Fourth Circuit ignored *303 Creative* and *Brown*, even though both cases were extensively briefed to the court.

Effectively, the County has hijacked the dealers and expropriated the goodwill the dealers enjoy with their customers. In its brief filed with the court of appeals, the County argued that “the Ordinance is just one feature of an extensive gun-violence-prevention campaign” and that the dealers’ customers are “more

likely to credit the information as coming from a trusted messenger.” *MSI v. Anne Arundel Co.*, No. 23-1351, ECF # 26 at 40 (4th Cir. July 10, 2023). The County is thus enjoying “a free pass to spread their preferred messages on the backs of others.” *American Meat Institute v. Dept. of Agriculture*, 760 F.3d 18, 31 (D.C. Cir. 2014) (en banc) (Kavanaugh, J., concurring).

According to the court of appeals, Petitioners should find this governmental theft of dealer goodwill “admirable.” Pet.App. 25a. It is not. It is Orwellian. See *303 Creative*, 600 U.S. at 602 (noting “an unfortunate tendency by some to defend First Amendment values only when they find the speaker’s message sympathetic”). “While the law is free to promote all sorts of conduct in place of harmful behavior, it is not free to interfere with speech for no better reason than promoting an approved message or discouraging a disfavored one, however enlightened either purpose may strike the government.” *Hurley*, 515 U.S. at 579.

While denied by the court of appeals (Pet.App. 14a, 20a), the ideological message conveyed to a reasonable person is, as Prof. Kleck stated, “don’t own a gun” because doing so increases the risk of suicide. Pet.App. 95a. That message stigmatizes and thus seeks to discourage legitimate and constitutionally protected firearm ownership. See *National Ass’n of Manufacturers v. SEC*, 800 F.3d 518, 523, 530 (D.C. Cir. 2015) (“NAM”) (declining to apply *Zauderer* where the rule required speakers to “express certain views” that their products were “ethically tainted”); *American Hospital Ass’n v. Azar*, 983 F.3d 528, 541 (D.C.Cir. 2020) (reaffirming that “such expressive content” could not be compelled).

The Ordinance is also facially underinclusive. Suicide prevention is a concern shared by society, not

just by gun owners. That underinclusivity “raises serious doubts about whether the government is in fact pursuing the interest it invokes, rather than disfavoring a particular speaker or viewpoint.” *Brown*, 546 U.S. at 802. See also *Williams-Yulee v. Florida Bar*, 575 U.S. 433, 449 (2015) (“a law’s underinclusivity raises a red flag”). As stated in *NIFLA*, statutes that discriminate among speakers “run the risk that the State has left unburdened those speakers whose messages are in accord with its own views.” 585 U.S. at 778. Here, as in *NIFLA*, the County’s law “targets speakers, not speech.” *Id.* See *Sorrell v. IMS Health*, 564 U.S. 552, 578-79 (2011) (“The State may not burden the speech of others in order to tilt public debate in a preferred direction.”).

A similar ideological message is sent by the Ordinance with respect to “conflict resolution,” *viz.*, that purchasers of firearms and ammunition are in special need of information concerning third party services on peaceful “conflict resolution.” Contrary to the Fourth Circuit’s belief (Pet.App. 16a), there is nothing “sarcastic” about that observation; it flows inexorably from the exclusive focus of the Ordinance on such purchasers. The universe of people who might find peaceful conflict resolution services useful obviously extends far beyond gun owners.

Finally, *NIFLA* squarely holds that *Zauderer* cannot justify compelled speech that “relates to the services” provided by *third parties*. *NIFLA*, 585 U.S. at 769. Both the suicide pamphlet (Pet.App. 92a) and the conflict resolution pamphlet (Pet.App. 93a), convey information about third party services. Indeed, the conflict resolution pamphlet is *completely* about the services of third parties. The County’s literature fails under *NIFLA* for that reason alone.

**B. The Fourth Circuit's Decision Conflicts
With *Central Hudson* On The Limits Of
The "Commercial Speech" Doctrine**

The court of appeals also held that the County's suicide pamphlet was "commercial speech." The court reasoned that the pamphlet was "commercial" merely because it "provide[s] warnings of risks and proposed safety steps with respect to firearms sold by gun dealers in commercial establishments." Pet.App. 18a. That construction of the commercial speech doctrine is so open to abuse and so obviously wrong as to warrant summary reversal.

Central Hudson holds that commercial speech means an "expression related *solely* to the economic interests of the speaker and its audience." *Central Hudson*, 447 U.S. at 561 (emphasis added). See also *Virginia State Bd. of Pharmacy v. Virginia Citizens Consumer Council, Inc.*, 425 U.S. 748, 762 (1976). It is undisputed here that nothing in the compelled pamphlets relate to "economic interests" of the dealers or their customers. The Fourth Circuit refused to apply the *Central Hudson* test, holding the suicide pamphlet was commercial speech merely because Petitioners sell firearms. Pet.App. 17a-18a.

The core error of the Fourth Circuit's decision is that it conflates *where* speech is compelled with the *content* of the speech itself. Nothing in the *content* of the County's compelled speech is remotely commercial. The court's holding thus eliminates the requirement that compelled speech *itself* relate "solely" to the economic interest of the speaker. Under the court's test, there is no practical or principled limit on the speech the government could compel as "commercial speech." The commercial speech inquiry would be bounded only by the government's imagination in

claiming a relationship between the compelled speech and the product. The potential for abuse is apparent.

Zauderer's underlying rationale is that the speaker's "constitutionally protected interest in *not* providing any particular factual information in his advertising is minimal." 471 U.S. at 651. In other words, purely factual and uncontroversial commercial speech may be compelled where the commercial entity *is already voluntarily speaking* on the matter. See *United Foods*, 533 U.S. at 416. That rationale is lost if *Zauderer* is construed, as the court of appeals did here, to permit compelled speech on any product sold at retail, regardless of the content of the speech and regardless of whether the speaker merely wishes to exercise the constitutional right to remain silent.

NIFLA states that "we do not question the legality of health and safety warnings long considered permissible, or purely factual and uncontroversial disclosures about commercial products." 585 U.S. at 775. Seizing on this dictum, the Fourth Circuit likened the County's compelled speech to posting requirements imposed on dealers by a federal regulation and by three State laws. Pet.App. 14a. Yet, such provisions have never been challenged as they merely require the distribution or posting of a *statute*, such as legal restrictions on the sales of firearms to minors. Such restrictions may well relate to "terms of services" (e.g., no sales to minors). Nothing in those minimal requirements remotely compares to compelled speech on government policies like "suicide prevention" and "conflict resolution."

To be sure, the government may compel "commercial disclosures that are common and familiar to American consumers, such as nutrition labels and health warnings." *American Meat*, 760 F.3d at 31 (Kavanaugh, J.,

concurring). But such labels and health warnings necessarily accompany *other* speech voluntarily made by manufacturers in marketing the very product on which the labels or warnings are attached. The labels and warnings are thus intended to ensure full disclosure to prevent consumer confusion or deception about the product being sold, a goal consistent with *Zauderer*. The suicide and conflict resolution pamphlets at issue here are not labels or health warnings. Rather, as noted above, they are “just one feature” of the County’s “gun-violence-prevention campaign.” That campaign is not “commercial” and cannot be justified by any need to avoid confusion or deception on the sale of a particular product.

The Fourth Circuit plainly misread Justice Stevens’ concurrence in *Rubin v. Coors Brewing Co.*, 514 U.S. 476 (1995) (Stevens, J. concurring), as supporting its ruling. Pet.App. 17a-18a. There, Justice Stevens concurred in the Court’s judgment that the beer label restrictions imposed by the Federal Alcohol Administration Act, 27 U.S.C. § 205(e)(2), were unconstitutional. But Justice Stevens wrote separately because, in his view, “[a]s a matter of common sense, any description of commercial speech that is intended to identify the category of speech entitled to less First Amendment protection should relate to the reasons for permitting broader regulation: namely, commercial speech’s potential to mislead.” *Rubin*, 514 U.S. at 494 (Stevens, J., concurring). Justice Stevens’ reference to specific disclosure requirements in a footnote, cited by the court of appeals (Pet.App. 17a-18a), must thus be understood as examples of *this* type of speech.

That same rationale forms the basis of *Milavetz*, 559 U.S. at 250, *United Foods*, 533 U.S. at 416, and *Zauderer* itself. See also *Bolger v. Youngs*

Drug Products Corp., 463 U.S. 60, 64-65 (1983) (“regulation of commercial speech based on content is less problematic” because of “the greater potential for deception or confusion in the context of certain advertising messages”). Those considerations are absent where, as here, the compelled speech is not intended to prevent deception or confusion and the compelled speaker merely wishes to remain silent. The County has never contended (nor could it) that dealer silence about the County’s “gun-violence-prevention campaign” could mislead any purchaser.

C. The Fourth Circuit’s Decision Conflicts With *Zauderer* and *Brown* On What Constitutes “Purely Factual and Uncontroversial” Speech

The Fourth Circuit held that the suicide pamphlet’s statement that “access to firearms is a ‘risk factor’ that increases ‘the chance’ of suicide” was “purely factual” and “uncontroversial” *solely* by reference to what it called a “logical syllogism,” *viz.*, “[i]f guns are the primary means of suicide and if guns are not accessible to persons with suicidal ideation, then the number of suicides would likely decline.” Pet.App. 21a. But the court’s “logic” assumes its conclusion and amounts to nothing more than *post hoc ergo propter hoc*, or *cum hoc ergo propter hoc* reasoning. That is not a “logical syllogism,” it is a logical fallacy.

The district court ruled, and the County conceded, that the supposed link between firearms access and suicide is supported only by a “correlation” or a “correlational relationship.” Pet.App. 56a,59a. The Fourth Circuit agreed. *Id.* at 9a,20a. But if access is not a causal factor for suicide, then the court’s “logical syllogism” falls apart. As Petitioners’ expert explained, “you can’t prevent suicide by eliminating

something that's merely coincidentally associated with suicide. It's got to be a factor that has some causal effect." Pet.App. 97a. That point is too self-evident to admit of rational dispute. Thus, in insisting that the pamphlet did not assert a causal connection (Pet.App. 20a), the court of appeals refuted the very premise of its "logical syllogism" that supposedly made the pamphlet "purely factual and uncontroversial." The Fourth Circuit cannot have it both ways.

At a minimum, the suicide pamphlet is seriously misleading in factually asserting that persons with access to firearms "are more at risk of suicide than others" (Pet.App. 88a) where it is undisputed that access and suicide are merely correlated. See, e.g., *United States v. Valencia*, 600 F.3d 389, 425 (5th Cir.), *cert. denied*, 562 U.S. 893 (2010) ("Evidence of mere correlation, even a strong correlation, is often spurious and misleading when masqueraded as causal evidence."). In *Brown*, this Court rejected correlation evidence as insufficient to justify content-based compelled speech. *Brown*, 564 U.S. at 800-01 ("ambiguous proof will not suffice"). See also *Free Speech Coalition, Inc. v. Paxton*, 95 F.4th 263, 282 (5th Cir. 2024), *petition for cert. pending*, No. 23-1122 (filed, April 12, 2024) (dismissing the State's evidence of a "correlative relationship" as insufficient). Inexplicably, the court of appeals never addressed *Brown*.

As Petitioners' expert explained, restricting access to firearms could reduce suicide only if guns were the only means or the most lethal means of committing suicide. Pet.App. 119a. Yet, the second most common means of suicide (hanging) is readily available (e.g., a bed sheet) and is just as likely to result in death. Pet.App. 109a-110a, 119a. And, of course, there are many other means of committing suicide that are

100% effective. *Id.* Not surprisingly, “[t]he technically strongest macro-level studies find no significant association between gun ownership rates and total suicide rates.” Pet.App. 129a.

At a minimum, the supposed connection between access and suicide is open to legitimate debate and thus cannot be “purely factual and uncontroversial.” See *Free Speech Coalition*, 95 F.4th at 281-82 (“a compelled statement is ‘uncontroversial’ for purposes of *Zauderer* where the truth of the statement is not subject to good-faith scientific or evidentiary dispute and where the statement is not an integral part of a live, contentious political or moral debate”); *National Ass’n of Wheat Growers v. Bonta*, 85 F.4th 1263, 1278 (9th Cir. 2023) (same). See also *Sorrell*, 564 U.S. at 578 (“resolution” of “divergent views” “must result from free and uninhibited speech”).

Instead of faithfully applying *Brown* the court of appeals disposed of the issue with an *ipse dixit*, stating that “any reasonable reader would understand from the pamphlet that it only gives the message that *because firearms are the leading means by which suicide is committed, firearms should be stored safely to reduce suicides by firearms.*” Pet.App. 13a. That statement makes the same error as the pamphlet because it assumes that safe storage would, in fact, cause a reduction in suicide, a point disputed by Petitioners’ expert. Pet.App. 100a. And the suicide pamphlet’s assertions are not remotely “only” so limited. No observant reader would fail to note the pamphlet’s misleading and “probably false” factual assertion (Pet.App. 106a, 118a) that persons who have mere “access” to firearms “*are more at risk for suicide than others.*” Pet.App. 88a (emphasis added). The court’s assertion ignores all the other statements in

the eight-page pamphlet concerning suicide warnings, causes of suicide, the importance of reaching out and the availability of third-party resources (Pet.App. 89a-92a), all of which are directed exclusively at purchasers of firearms or ammunition. There is nothing “purely factual and uncontroversial” about the implicit message sent by the Ordinance that gun owners are uniquely in need of suicide prevention information.

II. THE LOWER COURTS ARE IN CONFLICT ON THE SCOPE OF *ZAUDERER*

A. The Circuits Are In Conflict Concerning Whether *Zauderer* Is Limited To The Terms of Services

NIFLA holds that *Zauderer* is limited to “purely factual and uncontroversial information *about the terms under which . . . services will be available*” and “does not apply outside of these circumstances.” *NIFLA*, 585 U.S. at 768-69 (emphasis added). The Ninth, Fifth and Fourth Circuits have refused to adhere to that “terms-of-services” limitation. Two other circuits, the Eleventh Circuit, and the D.C. Circuit, have been faithful to *NIFLA* and hold that the compelled speech must about the “terms” of such “services.” This circuit split has developed post-*NIFLA* and warrants plenary review or summary reversal to remind the lower courts, including the Fourth Circuit in this case, that the limits placed on *Zauderer* in *NIFLA* and *Hurley* may not be ignored.

Specifically, the Ninth Circuit, sitting en banc, has held that “[t]he *Zauderer* test, as applied in *NIFLA*, contains three inquiries: whether the notice is (1) purely factual, (2) noncontroversial, and (3) not unjustified or unduly burdensome.” *American Beverage Ass’n v. City and County of San Francisco*, 916

F.3d 749, 756 (9th Cir. 2019) (en banc). That statement of the test drew a sharp dissent from Judge Ikutu, who stated that “[t]o determine whether the *Zauderer* exception applies, a court must consider whether the compelled speech governs only [1] ‘commercial advertising’ and requires the disclosure of [2] ‘purely factual and [3] uncontroversial information about [4] *the terms under which . . . services will be available.*’” *Id.*, 916 F.3d at 759 (Ikutu, J., dissenting from the reasoning) (emphasis added) (brackets in original). Judge Ikutu would have held that the “compelled speech” there at issue did not pass muster because it did not relate to “the terms on which that product is provided.” *Id.* at 761. Thus, in the Ninth Circuit, the government need only show that “the compelled disclosure . . . *relates to the service or product provided.*” *CTIA - The Wireless Ass’n v. City of Berkeley*, 928 F.3d 832, 842 (9th Cir.), *cert. denied*, 140 S.Ct. 658 (2019) (emphasis added).

Similarly, in the Fifth Circuit, the rule is that “[s]tates may require commercial enterprises to disclose ‘purely factual and uncontroversial information’ about their services.” *Chamber of Commerce of United States v. SEC*, 85 F.4th 760, 768 (5th Cir. 2023), quoting *NetChoice, LLC v. Paxton*, 49 F.4th 439, 485 (5th Cir. 2022), *cert. granted*, 144 S.Ct. 477 (2023) (emphasis added). That test was key to the Fifth Circuit’s ruling in *NetChoice* that the Texas law regulating social media platforms was constitutional. *NetChoice*, 49 F.4th at 485. The Ninth Circuit and the Fifth Circuit have thus effectively abrogated the *Zauderer* requirement that compelled commercial speech be “*about the terms under which [the speaker’s] services will be available.*” *Zauderer*, 471 U.S. at 651 (emphasis added).

In this case, the Fourth Circuit likewise has held that compelled speech need not be about the *terms* on which services are available, holding that compelled speech need only be “linked” to a product sold commercially. Pet.App. 17a. The Fourth Circuit, the Ninth Circuit and the Fifth Circuit thus allow governments to compel speech that merely “relates to” or is “about” or is “linked” to a product or service. The standard employed by these courts is thus unmoored from the full disclosure rationale of *Zauderer* emphasized in *NIFLA*, *Hurley*, *Milavetz*, *United Foods*, *Bolger*, and by Justice Stevens in *Rubin*. By divorcing *Zauderer* from its rationale, the standard adopted by these courts allows governments to inflict compelled speech on businesses who merely wish not to speak.

In contrast, the Eleventh Circuit and the D.C. Circuit have been faithful to *Zauderer* as limited by *NIFLA*. Thus, in *NetChoice, LLC v. Attorney General, Florida*, 34 F.4th 1196, 1227 (11th Cir. 2022), *cert. granted*, 144 S.Ct. 478 (2023), the Eleventh Circuit held that compelled speech under *Zauderer* must be “about their conduct toward their users *and* the ‘terms under which [their] services will be available.’” (Citation omitted) (emphasis added) (brackets in original). Similarly, the D.C. Circuit has stated, post-*NIFLA*, that “[c]ritical to the Court’s decision, the disciplinary ruling required disclosure [in *Zauderer*] of only ‘purely factual and uncontroversial information about the terms under which [the attorney’s] services will be available.’” *American Hospital Ass’n.*, 983 F.3d at 540, quoting *Zauderer*, 471 U.S. at 651 (emphasis added). The D.C. Circuit applied that test to hold that a federal rule requiring disclosure of hospital rates was “directly relevant to ‘the terms under which [hospitals’] services will be available’ to consumers.” *Id.* These splits warrant review.

B. The Circuits Are In Conflict Over the Meaning of “Commercial Speech”

The courts of appeals are also divided on what constitutes “commercial speech.” The Fourth Circuit held the requirement of commercial speech was satisfied in this case merely because the County’s Ordinance compelled speech was “linked” (by the County) to a product sold at retail. Pet.App. 17a-18a. The court expressly declined to apply the definition established by *Central Hudson*. *Id.*

In contrast, the Fifth Circuit, in *Book People, Inc. v. Wong*, 91 F.4th 318, 339 (5th Cir. 2024), held that commercial speech under *Zauderer* is limited to “[e]xpression related solely to the economic interests of the speaker and its audience,” quoting *Central Hudson*, 447 U.S. at 561, or “speech which does ‘no more than propose a commercial transaction,’” quoting *Virginia State Bd. of Pharmacy*, 425 U.S. at 762. The Fifth Circuit quoted with approval then-Judge Kavanaugh’s view that “*Zauderer* is best read simply as an application of *Central Hudson*, not a different test altogether.” *Book People*, 91 F.4th at 339 n.124, quoting *Am. Meat Inst.*, 760 F.3d at 33 (Kavanaugh, J., concurring). See also *Free Speech Coalition*, 95 F.4th at 279-80 (holding that the compelled speech was “commercial” because it was explicitly tied to speech that “propose commercial transactions”).

If *Zauderer* is tied to *Central Hudson*, then “commercial speech” under *Zauderer* cannot be given a broader meaning than the term has under *Central Hudson*. That is particularly so given that *Central Hudson* requires the government to satisfy intermediate scrutiny and *Zauderer*, at least in the Fourth Circuit, merely requires “rational basis” review. *Greater Baltimore Center for Pregnancy Concerns, Inc. v. Mayor and City*

Council of Baltimore, 721 F.3d 264, 283 (4th Cir. 2013) (en banc).

This Court stated in *Ohralik v. Ohio State Bar Ass’n*, 436 U.S. 447, 455-56 (1978), “[w]e have not discarded the ‘common-sense’ distinction between speech proposing a commercial transaction, which occurs in an area traditionally subject to government regulation, and other varieties of speech.” That distinction is at the heart of both *Central Hudson* and *Zauderer*. See also *Bolger*, 463 U.S. at 64-65. Under the Fourth Circuit’s test, the government may compel, as “commercial speech,” *any* speech “linked” to the sale of *any* product by *any* commercial entity, *regardless* of the content of the speech and *regardless* of whether the speaker merely desires to remain silent. No court has gone that far.

**C. The Fourth Circuit Is In Conflict With
The Ninth Circuit And The D.C. Circuit
Over The Test For “Purely Factual and
Uncontroversial Information”**

There is also a conflict between the Fourth Circuit’s decision in this case and the Ninth Circuit’s decision in *Wheat Growers* with respect to what constitutes “purely factual and uncontroversial information.” *Wheat Growers* holds that “[i]nformation that is purely factual is necessarily ‘factually accurate,’ but that alone is not enough to qualify for the *Zauderer* exception.” 85 F.4th at 1276. Rather, the Ninth Circuit warned that “a statement may be literally true but nonetheless misleading and, in that sense, untrue.” *Id.* (citation omitted). The court thus ruled that, under *Zauderer*, “the topic of the disclosure and its effect on the speaker is probative of determining whether something is subjectively controversial.” *Id.* at 1277. The court applied that test to reject the safety

warnings in that case because they could be materially misleading to a “reasonable person.” *Id.* at 1280-81.

Similarly, the D.C. Circuit has held that “purely factual and uncontroversial” speech cannot include speech that implies that the speaker’s product is “ethnically tainted” or otherwise puts the speaker in a bad light. *NAM*, 800 F.3d at 530. Post-*NIFLA*, the D.C. Circuit reaffirmed *NAM* as involving the type of “expressive content” that could not be compelled under *Zauderer*. *American Hospital Ass’n.*, 983 F.3d at 541.

Here, neither the district court nor the Fourth Circuit employed the *Wheat Growers* test in ruling that the County’s literature was “purely factual and uncontroversial.” In a footnote (Pet.App. 55a-56a n.8), the district court dismissed Petitioners’ objections about the misleading “messages” sent by the pamphlets and refused to consider whether such messages were the type of adverse “expressive content” that could not be compelled under *Zauderer*. That decision by the district court, affirmed by the Fourth Circuit, is incompatible with *Wheat Growers*, which holds that even “literally true” speech cannot be compelled where it is “nonetheless misleading.” 85 F.4th at 1279 (citation omitted).

III. THIS CASE IS THE IDEAL VEHICLE

This case is an excellent vehicle to address all of these issues. The Fourth Circuit reviewed a final judgment entered after full discovery on cross motions for summary judgment. There are no procedural obstacles or factual issues that would preclude reaching the merits. The legal issues are unquestionably important and squarely presented. Resolution of these issues is especially appropriate in this case because the compelled speech at issue here implicates the right

to keep and bear arms protected by the Second Amendment. If governments may compel speech stigmatizing the exercise of a fundamental constitutional right, then “there would be no end to the government’s ability to skew public debate” about such rights. *NAM*, 800 F.3d at 530. Skewing the debate is precisely what the County’s Ordinance does here.

Allowing these issues to fester will result in more jurisdictions enacting such laws.² But such issues are hardly limited to the Second Amendment. People in the United States are sharply divided on a host of other cultural issues, as the *NetChoice* litigation illustrates. If the approach to compelled speech adopted by the Fourth, Fifth and Ninth Circuits is allowed to stand, “red states” will feel entitled to compel speech on their preferred policies and way of thinking while “blue states” will feel entitled to do likewise and in opposite ways. That result is made all the more likely by the Fourth Circuit’s extraordinary and expansive view of “commercial speech.” Allowing further “percolation” of these issues invites such laws, and a corresponding destruction of First Amendment values in the Fourth Circuit and around the country.

IV. THE EXCLUSION OF PETITIONERS’ EXPERT VIOLATES *DAUBERT* AND *JOINER*

The district court excluded the otherwise admissible testimony (Pet.App. 54a) of Petitioners’ expert because the court disagreed with Prof. Kleck’s reading of

² Another Maryland county has already followed Respondent’s lead. See Montgomery County Code, § 57-11A (effective March 24, 2024) (requiring a “gun shop” to “make conspicuous and available” county literature on, *inter alia*, “suicide prevention,” “mental health,” and “conflict resolution.”

the suicide pamphlet as asserting a causal connection between access to a firearm and suicide. The court reasoned that because, in the court's view, the pamphlet asserted only a correlation and not a causal connection, Prof. Kleck's testimony was not "sufficiently tied to the facts of the case." Pet.App. 56a, quoting *Daubert*, 509 U.S. at 591. The Fourth Circuit sustained that ruling as a permissible exercise of discretion. Pet.App. 24a. These result-driven holdings conflict with *Daubert* and *Joiner*, present important questions concerning the admissibility of expert testimony, and otherwise so far depart from the accepted and usual course of judicial proceedings that the exercise of this Court's supervisory power is warranted.³

The district court did not have discretion to exclude otherwise admissible expert evidence just because it disagreed with the expert's opinion. First, the district court imposed its reading without applying the 'reasonable reader' legal standard of *Wheat Growers*, 85 F.4th at 1281-82. The court thus willfully blinded itself to misleading messages sent by the County's Ordinance. Pet.App.55a-56a n.8. That failure to employ the correct test is a *per se* abuse of discretion. *Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 405 (1990) ("A district court would necessarily abuse its discretion if it based its ruling on an erroneous view of the law").

Second, and more fundamentally, the district court far exceeded its gatekeeping powers by excluding otherwise admissible expert evidence that the factfinder was entitled to consider. In *Daubert*, 509 U.S.

³ This *Daubert* issue relates solely to expert evidence on whether the County's compelled speech is "purely factual and uncontroversial."

at 595, and *Joiner*, 522 U.S. at 146, this Court ruled that in performing the district court’s gatekeeping function with respect to experts, “the focus, of course, must be solely on principles and methodology, not on the conclusions that they generate.” The court of appeals ignored that holding. The Fourth Circuit even ignored its own circuit case law which makes clear that “[t]o determine whether an opinion of an expert witness satisfies *Daubert* scrutiny, courts *may not evaluate the expert witness’ conclusion* itself, but only the opinion’s underlying methodology.” *Bresler v. Wilmington Trust Co.*, 855 F.3d 178, 195 (4th Cir. 2017) (citation omitted) (emphasis added).

The district court did not fault Prof. Kleck’s “methodology,” it merely disagreed with his conclusions about the suicide pamphlet. But the credibility and weight of an expert’s opinion are for the fact finder. *Rodríguez v. Hospital San Cristobal, Inc.*, 91 F.4th 59, 71-72 (1st Cir. 2024) (“questions about the strength of ‘the factual underpinning of an expert’s opinion’ are ‘matter[s] affecting the weight and credibility of the testimony’ and therefore ‘a question to be resolved by the jury’”) (citation omitted). The district court does not sit as a fact finder on summary judgment. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 255 (1986); *Tolan v. Cotton*, 572 U.S. 650, 660 (2014) (summarily reversing). By stepping outside its gatekeeping role, the district court excluded the very expert evidence that demonstrated that the County’s literature was neither purely factual nor uncontroversial.

**V. ALTERNATIVELY, THE COURT SHOULD
HOLD THIS PETITION PENDING A
DECISION IN THE *NETCHOICE* LITIGATION**

The scope of *Zauderer* and the right not to speak reaffirmed in *303 Creative* are squarely before this Court in the *NetChoice* litigation. In deciding those cases, the Court may make clear that the right not to speak bars governments from compelling speech where the speaker wishes to remain silent, at least with respect to services that the speaker does not otherwise provide. See, e.g., Brief of the *Paxton* Petitioners at 19 (“The freedom to disseminate speech necessarily includes the right to choose *whether* and *how* to do so.”). Petitioners here prevail under such a holding.

Similarly, both the Eleventh and Fifth Circuits limited *Zauderer* to speech intended to ensure full disclosure with respect to commercial speech *otherwise* voluntarily undertaken by a commercial entity. Affirmance of that approach would compel reversal here. The Court will likely make clear that *303 Creative* is controlling, not *Zauderer*, with respect to laws compelling speech on services not otherwise voluntarily provided. See *R J Reynolds*, 96 F.4th at 875 n.33.

Other issues in this case are also presented in *NetChoice*. The Eleventh Circuit ruled that, under *Zauderer*, “[a] commercial disclosure requirement must be ‘reasonably related to the State’s interest in preventing deception of consumers.’” *NetChoice, LLC*, 34 F.4th at 1230, quoting *Milavetz*, 559 U.S. at 250 (emphasis added). Here, the Fourth Circuit held that *Zauderer* allows the government to compel a commercial entity to display and distribute any

“safety” message the government wishes to convey about a product without regard to whether such speech was intended to prevent deception or consumer confusion. Pet.App. 16a-17a. If the Eleventh Circuit is correct (and it is), then summary reversal or a GVR is appropriate on that ground alone.

Similarly, the private media parties in both cases contend that *Zauderer* is limited to compelled speech in *advertising*. See Brief of Petitioner in *Paxton*, at 16; Brief of Respondent in *Moody* at 39 n.6. Acceptance of that argument would compel reversal here. The decision in the *NetChoice* litigation may well also provide additional guidance on the other issues posed by this Petition, including what constitutes “commercial speech” or the meaning of “purely factual and uncontroversial.”

CONCLUSION

The petition for certiorari should be granted. The Court should either grant plenary review or summarily reverse the Fourth Circuit. Alternatively, the Petition should be held pending a decision in the *NetChoice* litigation.

Respectfully submitted,

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May 17, 2024

No. 23-1225

IN THE
Supreme Court of the United States

MARYLAND SHALL ISSUE, INC.; CINDY'S HOT SHOTS, INC.;
FIELD TRADERS LLC; PASADENA ARMS LLC; AND
WORTH-A-SHOT, INC.,

Petitioners,

v.

ANNE ARUNDEL COUNTY, MARYLAND,

Respondent.

**On Petition for Writ of Certiorari to the
United States Court of Appeals
for the Fourth Circuit**

REPLY BRIEF FOR PETITIONERS

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CORPORATE DISCLOSURE STATEMENT

Pursuant to this Court's Rule 29.6, Petitioners state that Petitioner Maryland Shall Issue, Inc., has no parent corporation and no publicly held company owns 10 percent or more of its stock. The remaining Petitioners are privately held Maryland corporations. Each of these corporations has no parent corporation and no publicly held corporation owns 10 percent or more of their stock.

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I. *Zauderer* Does Not Apply

Nat'l Inst. of Fam. & Life Advoc. v. Becerra, 585 U.S. 755, 768-69 (2018) (“*NIFLA*”), held that *Zauderer v. Off. of Disciplinary Couns. of Supreme Ct. of Ohio*, 471 U.S. 626, 651 (1985), is limited to commercial speech that is “purely factual and uncontroversial information about the terms under which . . . services will be available” and “does not apply outside of these circumstances.” An “essential feature[]” of *Zauderer* is that the “required disclosures” were “intended to combat the problem of inherently misleading commercial advertisements.” *Milavetz, Gallop & Milavetz, P.A. v. United States*, 559 U.S. 229, 250 (2010). It applies only where the regulated party is otherwise *voluntarily* engaging in *commercial* speech that might otherwise be deceptive. *United States v. United Foods*, 533 U.S. 405, 416 (2001).

Compelled speech about services or products offered by *third* parties cannot possibly address the “problem” of misleading speech of the regulated party, *especially* where that party wishes to remain silent on the subject matter on which speech is being compelled. *Zauderer* did “not apply” in *NIFLA* because the notice there at issue “no way relates to the *services* that licensed clinics provide” but “[i]nstead it requires these clinics to disclose information about *state-sponsored* services.” 585 U.S. at 768-69 (emphasis the Court’s). Here, both the suicide pamphlet and the conflict resolution pamphlet require the dealers “disclose information” about *county-sponsored* services as well as services provided by *third* parties. Pet.App.92,93. The dealers do not provide suicide prevention or conflict resolution services or voluntarily engage in speech about such services. Here, as in

NIFLA, the rationale of *Zauderer* is completely absent. The County does not dispute it.

The County argues that *NIFLA* is inapplicable because the clinics there were not selling commercial products. *Id.* That point is irrelevant because the commercial context for compelled speech does not “make[] a difference.” *303 Creative LLC v. Elenis*, 600 U.S. 570, 594 (2023). Both *303 Creative* and *Brown v. Entertainment Merchants Ass’n*, 564 U.S. 786 (2011), involved compelled speech in a commercial context and neither even cited *Zauderer*. “A speaker’s right to ‘decide what not to say’ is ‘enjoyed by business corporations generally.’” *Moody v. NetChoice, LLC*, 144 S.Ct. 2383, 2410 (2024), quoting *Hurley v. Irish-American Gay, Lesbian and Bisexual Group of Boston*, 515 U.S. 557, 573-74 (1995). “The government may not, in supposed pursuit of better expressive balance, alter a private speaker’s own editorial choices about the mix of speech it wants to convey.” *NetChoice*, 144 S.Ct. at 2403.

The County argues that *303 Creative* involved “a law that forced a plaintiff to create art expressing a message she disagreed with.” BIO 16. The dealers likewise disagree with the County’s message. The compelled speech at issue in *303 Creative* and the compelled dissemination of the County’s pamphlets at issue here both involve the same “inherently expressive choice ‘to exclude a message [they] did not like from’ their speech compilation.” *NetChoice*, 144 S.Ct. 2410, quoting *Hurley*, 515 U.S. at 574. The web designer at least had the option of not creating *wedding* websites and could thus avoid communicating the State-mandated message. The dealers here have no such choice.

The County also argues that *303 Creative* and *Brown* did not “involve[] commercial disclosure requirements.” BIO 16. But *303 Creative* involved compelled speech in the commercial production of professional websites, a fact the Court rejected as irrelevant. 600 U.S. at 594. *Brown* involved labeling requirements on the sale of commercial products, violent video games. 564 U.S. at 789. The Court applied strict scrutiny because the law “imposes a restriction on the content of protected speech,” not because it banned sales to minors. 564 U.S. at 799. The Court ruled that “predictive judgments,” touted by the County (BIO 23), are permissible only as “to content-neutral regulation.” 564 U.S. at 799. The County’s pamphlets are not “content-neutral.”

The County relies on this Court’s observation in *NIFLA* that the Court does “not question the legality of health and safety warnings long considered permissible, or purely factual and uncontroversial disclosures about commercial products.” BIO 16-17, quoting *NIFLA*, 585 U.S. at 775. But “health and safety warnings” or “product disclosures” are no more presented in this case than they were in *NIFLA*. The County does not dispute that the Ordinance is just one “feature” of an “extensive gun-violence-prevention campaign” that intentionally expropriates the “trust” and goodwill that dealers have with their customers. Pet.15-16. “Misattribution” is not merely a “risk,” it is an integral part of the County’s “campaign.” See *NetChoice*, 144 S.Ct. at 2432 & n.18; *Hurley*, 515 U.S. at 574. The campaign is not the type of “warnings” or “disclosures” referenced in *NIFLA*. To hold otherwise would overrule the limits on *Zauderer* identified in *NIFLA*.

The County's "campaign" is intended to "promot[e] an approved message" and that is impermissible no matter how "enlightened" the compelled speech "may strike the government." *Hurley*, 515 U.S. at 579. See *NIFLA*, 585 U.S. at 768-69 (incorporating *Hurley*'s rejection of *Zauderer*); *NetChoice*, 144 S.Ct. at 2431 ("If a compilation is inherently expressive, then the compiler may have the right to refuse to accommodate a particular speaker or message"), citing *Hurley*, 515 U.S. at 573. "[T]his general rule, that the speaker has the right to tailor the speech, applies not only to expressions of value, opinion, or endorsement, but equally to statements of fact the speaker would rather avoid." *Hurley*, 515 U.S. at 573. See *Riley v. National Federation of the Blind of North Carolina, Inc.*, 487 U.S. 781, 790-91 (1988) ("the government, even with the purest of motives, may not substitute its judgment as to how best to speak for that of speakers and listeners; free and robust debate cannot thrive if directed by the government.").

II. Suicide Prevention and Conflict Resolution Is Not Commercial Speech

The County's opposition hinges on its assertion that the Ordinance merely "imposes a commercial disclosure requirement and is therefore subject to review under *Zauderer*." BIO 13. The County argues that the Ordinance is commercial speech because it regulates "retailers" and requires display and distribution "at the point of sale" to "purchasers" and "thus regulates retailers who 'propose a commercial transaction'" and therefore relate solely "to the economic interests of the speaker and its audience." *Id.* 15, quoting *Central Hudson Gas & Elec. Corp. v. Pub. Serv. Comm'n of N.Y.*, 447 U.S. 557 (1980)

(emphasis added). That view eviscerates the First Amendment rights of businesses.

The commercial speech inquiry under *Central Hudson* is not controlled by *whom* the law regulates or by *where* the speech takes place, but rather by the *content* of the speech being regulated, a point stressed in the Petition (Pet.18-19) but ignored by the County. The First Amendment protects “expression.” *NetChoice*, 144 S.Ct. at 2399-2400. *Central Hudson* thus held that “we must determine whether *the expression* is protected by the First Amendment.” 447 U.S. at 566. (Emphasis added). Whether the “expression” is commercial is, in turn, controlled by whether the “*speech* does ... ‘no more than propose a commercial transaction’” or relates solely to the “economic motivation” of the speaker. *Bolger v. Youngs Drug Prods. Corp.*, 463 U.S. 60, 66-67 (1983), quoting *Va. State Bd. of Pharmacy v. Va. Citizens Consumer Council, Inc.*, 425 U.S. 748, 762 (1976). (Emphasis added). See *Board of Trustees of State University of N.Y. v. Fox*, 492 U.S. 469, 473-34 (1989); *City of Cincinnati v. Discovery Network, Inc.*, 507 U.S. 410, 423 (1993).

Bolger is instructive. There, manufacturers and distributors of contraceptives challenged a federal statute banning the mailing of contraceptive advertisements. This Court held that “[t]he mere fact that these pamphlets are conceded to be advertisements clearly does not compel the conclusion that they are commercial.” 463 U.S. at 67. The Court further held that “the reference to a specific product does not by itself render the pamphlets commercial speech” and nor was it sufficient that the regulated party had “an economic motivation for mailing the pamphlets.” *Id.* Rather the Court found that the pamphlets were

commercial speech only because of “[t]he combination of *all* these characteristics.” *Id.* (Emphasis the Court’s). None of that analysis would have been necessary if all that mattered was that the pamphlets were distributed by a commercial entity, the test adopted by the Fourth Circuit here. Pet.App.16a-17a.

The County’s pamphlets are not “advertisements,” do not “propose a commercial transaction,” and are not limited to a “specific product.” Neither the dealers nor their customers have any “economic motivation” or economic interest in the suicide prevention and conflict resolution “speech” contained in the pamphlets. See *X Corp. v. Bonta*, --- F.4th ---, 2024 WL 4033063 at *8 (9th Cir. Sept. 4, 2024) (applying *Bolger* and holding that commercial speech is limited to speech that “communicates the terms of an actual or potential transaction”); *NetChoice, LLC v. Bonta*, --- F.4th ---, 2024 WL 3838423 at *12 (9th Cir. Aug. 16, 2024) (applying the “*Bolger* factors”). The pamphlets are not commercial speech.

III. The Literature Is Not “Purely Factual And Uncontroversial”

The second “essential feature” of *Zauderer* is that the compelled speech must be “purely factual and uncontroversial” and the County’s literature is neither. Pet.21-24. In response, the County concedes that the suicide pamphlet’s factual assertions are supported only by a correlation but asserts that is enough. BIO 21. The County thus ignores *Brown*’s holding that correlation evidence is insufficient to justify content-based restrictions on speech. *Brown*, 564 U.S. at 800-01. See also *Free Speech Coalition, Inc. v. Paxton*, 95 F.4th 263, 281-82 (5th Cir. 2024), *cert. granted*, No. 23-1122 --- S.Ct. ---, 2024 WL 3259690 (July 2, 2024). The Fourth Circuit’s flawed “logical

sylllogism” was the sole basis for its holding on this point, Pet. 21-22, as the County admits. BIO 21.

The County argues that Petitioners and their expert “misinterpret” the literature. BIO 22. Not so. The pamphlet *factually* asserts that persons with access to firearms “are More at Risk for Suicide than Others” (Pet.App.88a), and that statement goes far beyond any assertion of correlation. “Correlation” is not even mentioned in this literature. The pamphlets use correlation to imply causation and that is “junk science.” JA0278-JA0279. See Pet.21-22. Such misleading speech can never be “purely factual.” *National Ass’n of Wheat Growers v. Bonta*, 85 F.4th 1263, 1278 (9th Cir. 2023).

“Purely factual” and “uncontroversial” are distinctly different terms and cannot be collapsed into a single inquiry as the Fourth Circuit did here. Pet.App.20a; Amici Br.14. The test for “controversial” speech focuses on the *topic* of the speech, not whether individual statements in the literature are factually accurate. See *Wheat Growers*, 85 F.4th at 1277; *X Corp.*, 2024 WL 4033063 at *8. For example, the compelled notices in *NIFLA* failed under *Zauderer* not only because they pertained to third-party services but *also* because the notices concerned abortion which, the Court held, was “anything but an ‘uncontroversial’ *topic*.” 585 U.S. at 769. (Emphasis added). There was no dispute that the “content” of the compelled notices in *NIFLA* was factually accurate but that did not matter. “Firearm safety and violence are white-hot political topics.” Amici Br.16.

IV. The Circuits Are In Conflict

The County discounts the Eleventh Circuit’s application of *Zauderer* in *NetChoice, LLC v. Attorney*

General, Florida, 34 F.4th 1196, 1227 (11th Cir. 2022), arguing the conflict with that decision disappeared when the case was vacated and remanded in *NetChoice*. BIO 26. But this Court *endorsed* the Eleventh Circuit’s approach, 144 S.Ct. at 2399, while rejecting the Fifth Circuit’s analysis. 144 S.Ct. at 2399-2404. See Pet. 24-26. Those holdings support Petitioners. Pet.25-26. The cases were remanded so that the lower courts could evaluate the “full range of activities” covered by the statutes, an issue not presented here. 144 S.Ct. at 2397-98.

The County acknowledges that *American Hospital Ass’n v. Azar*, 983 F.3d 528, 541 (D.C. Cir. 2020), focused on the *terms* of services, but argues that “nothing” in that decision limited *Zauderer* to terms of services. BIO 25. *Azar* held that a focus on the terms of services was “critical” to *Zauderer*. 983 F.3d at 540. A “critical” element is not a “nothing.” The County cites *Azar*’s reference to a “particular product trait” (BIO 25-26) but that discussion concerned the *separate Zauderer* requirement that the compelled speech must be “‘reasonably related’ to the State’s interest in preventing deception of consumers.” *Azar*, at 540-41, quoting *Zauderer*, 471 U.S. at 650-51. The Fourth Circuit expressly rejected that limitation on *Zauderer*. Pet.App.15a. The Fourth Circuit’s decision thus conflicts with *Azar* twice over.

Nothing in *American Meat Institute v. Dept. of Agriculture*, 760 F.3d 18 (D.C. Cir. 2014) (en banc), allows the government to compel speech about any “product trait,” as the County asserts. BIO 26. See 760 F.3d at 31-32 (Kavanaugh J., concurring) (“it is plainly not enough for the Government to say simply that it has a substantial interest in giving consumers information”). “Suicide prevention” and

“conflict resolution” are not “product traits” and the “national origin” product information at issue in *American Meat* is nothing like the County’s “gun-violence-prevention campaign.” Id. 760 F.3d at 30.¹

Book People, Inc. v. Wong, 91 F.4th 318, 339 (5th Cir. 2024), holds that commercial speech is limited to “[e]xpression related solely to the economic interests of the speaker and its audience.” (Citation omitted). *Free Speech Coalition* ruled that the speech must “propose commercial transactions.” 95 F.4th at 279-80. The County asserts (BIO 27-28) that “nothing” in these holdings conflicts with the Fourth Circuit’s test. But the Fourth Court held that the “economic interests” inquiry “understands ‘commercial’ far too narrowly,” ruling that “commercial” includes any “safety advisory” about a product sold commercially. Pet.App.16a-17a. That holding is irreconcilable with the test applied in *Book People* and *Free Speech Coalition*. It is also at odds with the Ninth Circuit’s recent holdings in *X Corp.*, 2024 WL 4033063 at *8-*9, and *NetChoice*, 2024 WL 3838423 at *12, both of which applied *Bolger* to reject compelled speech.

The County argues (BIO 29) that *Wheat Growers* is consistent with the Fourth Circuit’s test for “uncontroversial” speech, but *Wheat Growers* looked to “*the topic of the disclosure and its effect on the speaker*” to determine “whether something is *subjectively* controversial.” 85 F.4th at 1277. (Emphasis added). The Fourth Circuit never considered *any* of those factors. Pet. 21-22. As Amici suggest, the court’s

¹ To the extent the majority opinion in *American Meat* divorced *Zauderer* from its deception-prevention rationale for “expressive content,” that reasoning has been superseded by *NIFLA. Azar*, 983 F.3d at 541; Pet.25.

“paper thin” analysis on this point conflicts with the approaches followed by other circuits. Amici Br.14-16. Those conflicts are ignored by the County.

V. The Exclusion of Petitioners’ Expert Cannot Stand

The exclusion of Petitioners’ expert was not “fact-bound,” as the County asserts. BIO 25. It was result-driven. See *Free Speech Coalition*, 95 F.4th 281-82 (a “good-faith scientific or evidentiary dispute” precludes application of *Zauderer*); *Wheat Growers*, 95 F.4th at 1281-82 (same). The district court’s exclusion was not based on the expert’s “principles and methodology.” *General Electric Co. v. Joiner*, 522 U.S. 136, 143 (1997), and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579, 595 (1993). Pet.32. The court improperly assessed the weight or credibility of the expert’s testimony. Pet.31-32; *Doucette v. Jacobs*, 106 F.4th 156, 169 (1st Cir. 2024); *Quiet Tech. DC-8, Inc. v. Hurel-Dubois UK Ltd.*, 326 F.3d 1333, 1345 (11th Cir. 2003).

VI. This Case Is An Excellent Vehicle

The Court has already plowed this ground in *NIFLA*, *303 Creative*, *Hurley*, *Milavetz*, *United Foods*, *Central Hudson*, *Bolger* and now *NetChoice*. Summary disposition is therefore appropriate. Pet.13; *Caetano v. Massachusetts*, 577 U.S. 411, 412 (2016). At a minimum, the Court should grant plenary review or, alternatively, GVR this case with instructions to reconsider the application of *Zauderer* in light of *NetChoice*, just as the Court did with respect to the *Zauderer* issues in *NetChoice*. 144 S.Ct. at 2399 n.3. This case is particularly important because of the Second Amendment concerns raised by the Ordinance. Pet.29-30, Amici Br.17-22.

The County faults Petitioners for supposedly failing to “reconcile” the legal issues posed by the compelled speech at issue here with the issues associated with disclosures required by a myriad of *other* regulatory schemes not before this Court. BIO 31. But cases are decided “one at a time.” *United States v. Hillary*, 106 F.3d 1170, 1173 (4th Cir. 1997). This Court will have ample opportunity to address *Zauderer* issues raised by the County’s “parade of horrors” should the occasion arise. See *Simmons v. Himmelreich*, 578 U.S. 621, 629 (2016).

Review is urgently needed because the type of compelled speech at issue here is rapidly becoming more and more Orwellian. The New York Legislature has just passed Senate Bill 6649, which will impose a \$1,000 fine and 15 days of imprisonment for each day the firearms dealer fails to post or distribute to each customer dire warnings about firearms access. See <https://bit.ly/4gbkDVs> (last viewed Sept. 5, 2024). These requirements and punishments are in addition to any imposed by local jurisdictions, such as by Westchester County, New York. Westchester County Code of Ordinances, § 529.21.

The law enacted by Montgomery County, Maryland (Pet.30 n.2) provides that any failure by the dealer to display and distribute the County’s speech is a “Class A” misdemeanor punishable, at the County’s “discretion,” either by a civil fine of \$500 for a first offense or by a criminal fine of \$1,000 and up to *six months* of imprisonment. Montgomery County Code, §§ 57-11A(d), 1-19. More State and local jurisdictions can be expected to follow suit. See, e.g, City of Boulder, Colorado Ordinances, § 5-8-40(b). As *NetChoice*, and the Ninth Circuit’s decisions in *X Corp.* and *NetChoice v. Bonta* illustrate, compelled speech is fast becoming the norm in other areas as well. See Amici Br.1-2.

CONCLUSION

The petition for certiorari should be granted. The Court should summarily reverse, grant plenary review, or GVR this case for reconsideration in light of *NetChoice*.

Respectfully submitted,

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September 6, 2024

SB 577 - MACHO - JPR - LOC.pdf

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Position: UNF



**2025 SESSION
POSITION PAPER**

BILL: SB 577 - Public Safety – Distribution of Literature to Purchasers of Firearms and Ammunition
COMMITTEE: Senate - Judicial Proceedings Committee
POSITION: Letter of Concern
BILL ANALYSIS: SB 577 would require the Maryland Department of Health to develop literature regarding firearms and ammunition for distribution to local health departments, require local health departments to distribute the literature to firearms and ammunition retailers in their county, require retailers to make the literature visible and available and distribute the literature to purchasers, and require local health departments to ensure retailer compliance with the requirements.

POSITION RATIONALE: The Maryland Association of County Health Officers (MACHO) submits a Letter of Concern for SB 577. The bill would establish a requirement that MDH prepare literature relating to firearms and ammunition including information regarding firearm safety and training, suicide prevention, and conflict resolution and for local health departments (LHDs) to carry out the work at the local level. MACHO supports the intent of the bill but is concerned with the additional requirements placed on LHDs which are not funded. Given additional proposed reductions to LHD funding, LHDs do not have the resources to implement their portions of SB 577.

Under the bill, each LHD would be responsible for distributing the literature to the firearm and ammunition retailers in their jurisdiction. Retailers would be required to display and distribute the literature to anyone purchasing firearms or ammunition. LHDs would also be required to conduct compliance checks to ensure that the materials are displayed and distributed in accordance with the law.

Two (2) counties in the state, Anne Arundel and Montgomery, currently operate similar programs at the local level designed at the community level with community support. In Anne Arundel, teams of two (2) Behavioral Health staff conduct compliance checks of retailers to ensure staff safety. These staff provide education to retail employees, conduct re-inspections, and track data on literature distribution to each retailer. The remaining LHDs do not have sufficient staffing or funding to conduct these activities. If SB 577 is passed, LHDs would likely need to divert resources from other legally mandated programs such as tobacco enforcement which might have the unintended effect of reducing compliance with tobacco-related laws. Other impacts would be felt for other locally identified and already allocated public health priorities.

MACHO believes addressing firearm violence is a public health issue. Unfortunately, LHDs do not have the resources necessary to implement these requirements. For these reasons, the Maryland Association of County Health Officers submits this letter of concern for SB 577. For more information, please contact Ruth Maiorana, MACHO Executive Director at rmaiora1@jhu.edu or 410-937-1433. *This communication reflects the position of MACHO.*

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Position: UNF

Please find **UNFAVORABLE** SB 577

Public Safety – Distribution of Literature to Purchasers of Firearms and Ammunition

The U.S. Supreme Court's decision in *National Institute of Family and Life Advocates (NIFLA) v. Becerra* (2018) [1] directly addresses the issue of compelled speech. In NIFLA, the Court struck down a California law requiring pro-life pregnancy centers to provide information about abortion services, holding that the government cannot force private entities to disseminate messages with which they disagree. The Court emphasized that the First Amendment protects individuals and businesses from being compelled to promote government-mandated messages.

This bill implies that firearms are socially harmful, which conflicts with the views of many gun owners and sellers. By forcing private businesses to distribute this literature, the government compels them to act as messengers for a narrative they do not support, thus violating their First Amendment rights. If (i.e. WHEN) challenged, this bill will probably face the same fate as the California law in NIFLA, with courts finding that it improperly compels speech by private entities.

The mandated literature will frame firearm ownership as a public health problem, unfairly stigmatizing law-abiding gun owners. This approach fails to recognize that the overwhelming majority of firearm owners use their guns responsibly.

This bill imposes additional administrative requirements on firearm sellers, particularly small businesses, who must ensure the literature is displayed, stocked, and provided to purchasers. It appears that its sole true purpose is to entrap vendors so that they are fined. Its yet another legal landmine meant to target a State disfavored industry. Also, giving printed literature to EVERY customer is certainly not very "green!"



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[1] https://en.wikipedia.org/wiki/National_Institute_of_Family_and_Life_Advocates_v._Becerra