

# **MPGVElizabethBanach\_FAV\_SB816**

Uploaded by: banach, elizabeth

Position: FAV



**SB 816-Support  
Firearm Dealers' Safety Act  
Elizabeth Banach, Executive Director  
Marylanders to Prevent Gun Violence  
Senate Judicial Proceedings Committee  
February 20, 2020**

Dear Chairman Smith, Vice-Chair Waldstreicher, and Members of the Committee,

Marylanders to Prevent Gun Violence is a local, grassroots organization dedicated to reducing gun deaths and injuries throughout the state of Maryland, with a particular focus on reducing urban gun violence and gun suicide. **We urge the committee to vote FAVORABLY on Senate Bill 816 to ensure that licensed firearm dealers implement effective practices and security measures to guard against gun theft .**

While the majority of gun dealers in this country are responsible business owners, a small minority have been connected to the diversion of firearms to the black market. Roughly five percent of gun dealers are responsible for about 90% of recovered crime guns nationwide. Despite Maryland's reputation as one with strong gun laws, there are still indicators that a large portion of Maryland's crime guns originate within the state.

Maryland is not immune to this danger posed by improper gun dealer practices. In a 2017 report, ATF traced 5,884 crime guns used within Maryland. Forty seven percent (2,775) of those originated in Maryland. Our neighboring state New Jersey has enacted comprehensive security measures for firearm dealers and had only 10 recorded firearms stolen from licensed gun dealers between 2012 and 2016. During that time period, 341 firearms were stolen from licensed firearm dealers in Maryland. In fact, nationally burglaries of licensed gun dealers increased by 48 percent between 2012 and 2016, while robberies increased by 175 percent. Baltimore County saw seven firearm stores burglarized ten times over the last two years. These alone accounted for 50 of the 212

stolen firearms for that period. Criminals have also recently targeted establishments in Howard and Montgomery counties on successive nights, stealing 45 weapons.

This bill creates mandatory business practices to ensure consistently responsible sales and prevent diversion to the criminal market. This law would level the playing field, demanding that all Federally Licensed Firearm Dealers in Maryland maintain the high safety standards already practiced by responsible businesses. MPGK urges that this committee vote **FAVORABLY** on SB 816 to ensure that licensed firearm dealers implement effective practices and security measures to guard against gun theft.

# **Anne Arundel County\_FAV\_SB 816**

Uploaded by: Baron, Peter

Position: FAV





February 20, 2020

**Senate Bill 816**

**Public Safety - Licensed Firearms Dealers (Firearms Dealers' Safety Act)**

**Senate Judicial Proceedings Committee**

**Position: FAVORABLE**

Anne Arundel County **SUPPORTS** Senate Bill 816 - Public Safety - Licensed Firearms Dealers (Firearms Dealers' Safety Act). This Bill would require licensed firearms dealers to keep current electronic records of receipts, sales, and dispositions of firearms, as well as electronic video and audio recordings of transactions. The Bill also requires licensed firearms dealers to create standard operating procedures to prevent theft and unauthorized access to firearms inventory and prohibit firearms dealers from hiring persons who are prohibited from possessing firearms .

In response to the 209 gun deaths in Anne Arundel County from 2013 to 2017, the Anne Arundel Gun Violence Prevention Task Force (GVPTF) undertook an examination of the universe of gun violence issues and prevention strategies through the lens of public health beginning in May 2019. Of the Task Force's many recommendations to reduce gun violence, supporting gun safety legislation is a major component.

This particular legislation will help to create and strengthen uniformity of records relating to firearms sales. It will also add new and strengthen current safeguards to prevent people from gaining unauthorized access to firearms. Furthermore, requiring annual employee checks with the Criminal Justice Information System Central Repository of the Department of Public Safety and Correctional Services, as well as requiring electronic records of sales be updated within 1 day of acquisition and 7 days of a sale will ensure that records are current in order to prevent prohibited persons from having access to firearms. Finally, requiring audio and video recording of sales will assist in law enforcement in the investigation of firearms related crimes.

Accordingly, Anne Arundel County requests a **FAVORABLE** report on Senate Bill 816.

# **MPGVThomasHarvey\_FAV\_SB816**

Uploaded by: harvey, thomas

Position: FAV



Volunteer Testimony

**SB 816-Support**

**Firearm Dealers' Safety Act**

**Thomas Harvey**

**301-460-4939**

**4001 Montpelier Road; Rockville, MD 20853 District 19**

**Senate Judicial Proceedings Committee**

**February 20, 2020**

Dear Chairman Smith and Members of The Committee:

I am a retired factory owner with a career of safety responsibility around dangerous machinery and a former armament maintenance officer for the US Army.

**Dealer Responsibility is Critical to Public Safety**

Maryland has a carefully crafted set of laws and regulations to ensure that guns are only in the hands of trained and responsible gun owners. Diversion of guns by theft or illegal transfer from dealers is a complete end run around this system and puts guns into the hands of those who are the worst threat to our citizens.

Studies of the origin of crime guns have shown that, even in states such as Maryland with higher levels of gun regulation, most crime guns have originated in the state in which they were used. That is: most bad guns are not illegally imported into the state. So, it is very important that guns be prevented from crossing from legal hands to improper ones.

This bill adds provisions to current regulations protecting guns from theft both when businesses are open and when they shut down for the night. There are provisions for recordkeeping, videoing of transactions, vetting of employees and immediate report of thefts and disappearances. All of these will have a strong effect in reducing the number of guns that go from dealers to dangerous persons.

Other than firearms, any product so inherently dangerous as guns would seem normal having this level of regulation. It would not be controversial. We tightly regulate many things from motor vehicles to hazardous occupations to explosives. The existence of some who have a desire to eliminate

all controls over guns does not reduce the hazard guns pose. It is hard to see how anyone who cares about the safety of children or adults would oppose these reasonable provisions.

### **Insurance Provision is Critical to Dealer Supervision**

This bill assigns critical responsibilities to gun dealers. Gun dealers are under economic and customer pressure to sell as many guns and incur as few expenses as possible. They have also become used to a light level of regulation. They will require substantial supervision if we are to achieve our goals in protecting the public. The insurance requirement of this bill provides much of that supervision.

The regulations provide for government inspection of records and of the inventory of dealers. But the provisions to protect guns from theft or diversion need additional guarantees of compliance. Additional government inspections would help in this matter, but they are limited by the available resources and by the desire of some to limit government intrusiveness in private businesses. The gap can be filled an insurance requirement.

The nature of insurance makes insurers have a real money interest in safety and loss prevention. They would recognize that from these requirements there are potential losses from careless or dishonest gun dealers. Insurers would do their own inspections and make reasonable requirements for dealers that would reduce the danger both to the insurer's finances and to the public.

While in business I had many kinds of insurance protecting vehicles, employees and other aspects of my operations. My experience made clear that insurance requirements not only protected me directly; but the insurers loss prevention efforts, such as inspections, provided a further layer of protection. Guns are the only kind of business that is risky to the public and does not demand insurance to help mitigate the risks.

# **BRADYKelseyRogers\_FAV\_SB816**

Uploaded by: nichols, christa

Position: FAV



Testimony of Christa Nicols, Counsel & Kelsey Rogers, Senior Manager of State Policy, Brady Support  
for SB 816, The Firearms Dealers' Safety Act  
Before the Maryland Senate Judicial Proceedings Committee  
February 20th, 2020

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

Founded in 1974, Brady works across Congress, courts, and communities, uniting gun owners and non gun owners alike, to take action, not sides, and end America's gun violence epidemic. Our organization today carries the name of Jim Brady, who was shot and severely injured in the assassination attempt on President Ronald Reagan. Jim and his wife, Sarah, led the fight to pass federal legislation requiring background checks for gun sales. Brady continues to uphold Jim and Sarah's legacy by uniting Americans from coast to coast, red and blue, young and old, liberal and conservative, to combat the epidemic of gun violence.

Brady thanks the Committee for taking action on this critical legislation. **SB 816, the Firearms Dealers' Safety Act, will implement regulatory fixes to demonstrably reduce firearm thefts, and in turn, reduce gun violence in communities across Maryland.** Brady's President, Kris Brown, recently spoke out in support of this bill, calling it "the kind of common-sense violence prevention bill that all sides can agree on."

**Stolen guns are a public safety hazard that can be addressed with common-sense regulation**

Stolen guns pose a significant risk to public safety because they are easily diverted to the criminal market and many are ultimately recovered at the scenes of violent crimes, including homicides and robberies. Most stolen guns are recovered in connection with crime near the location where the theft took place.<sup>1</sup> Currently, licensed dealers in Maryland are not subject to any legal requirements, under federal or state law, to secure their firearm inventory, setting them apart from any other businesses in the state that store and sell potentially dangerous products. Pharmacies and cannabis dispensaries operating within the state are required by law to implement minimum theft prevention measures; firearms dealers are not.

<sup>1</sup> Brian Freskos, *Missing Pieces: Gun theft from legal owners is on the rise, fueling violent crime across America*, THE TRACE (Nov. 20, 2017) available at <https://www.thetrace.org/features/stolen-guns-violent-crime-america/>

The ensuing risk to public safety cannot be overstated. Once stolen, the guns cannot be traced by law enforcement, which severely undermines criminal investigations involving guns. Further, data from the Federal Bureau of Investigation (FBI) provides that approximately 22,000 guns were stolen from retailers between 2012 and 2015.<sup>2</sup> That number is alarming. The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) expressed concerns about persistent theft from licensed dealers in 2018, calling it one of the agency’s primary “external challenges.” In the absence of any federal or state security requirements, dealers in Maryland may choose to accept or ignore suggestions from law enforcement and regulators on a voluntary basis despite the high risk of theft.<sup>3</sup>

Criminals are taking note of the gap in the laws. According to data on theft from licensed dealers from ATF, burglaries increased 48 percent and robberies increased 175 percent between 2012 and 2016.<sup>4</sup> Gun theft is on the rise across the country because stolen guns are very easy for criminals to sell. The chief of the ATF’s Intelligence Unit said: “[g]uns are the hottest commodity out there, except for . . . cold, hard cash.”<sup>5</sup> Reporting from the Baltimore Sun suggests that many retail establishments in the state do not consistently, comprehensively, and effectively secure their firearms inventory.<sup>6</sup> Without action to require gun dealers to implement safe business practices, we cannot expect theft from dealers and their subsequent diversion to the criminal market to slow.

State governments, however, *can* work to reduce the flow of stolen firearms to the criminal market by enacting laws like the Firearms Dealers’ Safety Act. Research published in 2018 found that changes in security requirements are effective at reducing theft from firearms retailers.<sup>7</sup> Further, states with physical security requirements experience lower rates of firearms theft from licensed dealers. For example, in New Jersey, which has implemented comprehensive security mandates for licensed firearm retailers, ATF recorded only 10 stolen firearms within the state between 2012 and 2016. Conversely, Maryland had 354 stolen firearms recorded during that same period.<sup>8</sup>

### **The Firearms Dealers’ Safety Act addresses an important gap in federal and state regulation of licensed dealers**

Firearms regulation in the United States is a patchwork of federal, state, and local law. ATF is the sole federal agency with the authority to oversee firearms dealers in the United States. ATF considers federally licensed gun dealers to be “the first line in maintaining the security and lawful transfer of firearms” and issues detailed guidance on safe business practices and security measures that dealers can

<sup>2</sup> Chelsea Parsons and Eugenio Weigend Vargas, *Stolen Guns in America: A State-by-State Analysis*, CENTER FOR AMERICAN PROGRESS (Jul. 25, 2017) available at <https://www.americanprogress.org/issues/guns-crime/reports/2017/07/25/436533/stolen-guns-america/>

<sup>3</sup> *Id.*

<sup>4</sup> Parsons, *supra*.

<sup>5</sup> Freskos, *supra*.

<sup>6</sup> Keith Daniels, *How Would Baltimore County’s “SAFE Act” Affect Gun Store Owners?*, FOX BALTIMORE (Nov. 27, 2019) available at <https://foxbaltimore.com/news/local/how-would-baltimore-countys-safe-act-affect-gun-stores-owners>

<sup>7</sup> Freskos, *supra*.

<sup>8</sup> Parsons, *supra* at Table 1.

adopt on a voluntary basis to prevent legal guns from entering the criminal market.<sup>9</sup> Despite that recognition, ATF provides almost no oversight of FFLs' general business practices and does not mandate any security measures.

ATF is systematically underfunded and legally restricted from providing meaningful oversight of gun dealers. This leaves a significant gap in enforcement where state and local governments should be empowered to step in and ensure licensed dealers are engaging in safe business practices that prevent legal guns from being diverted to the criminal market, whether through straw purchases, trafficking, or firearm loss or theft. The Firearms Dealers' Safety Act addresses this gap by requiring common-sense safety and security practices that are consistent with practices that the ATF already urges dealers to adopt.

### *Federal regulation is insufficient*

Federal law is insufficient to detect and deter theft from gun dealers because the law does not *require* FFLs to engage in safe business practices or to employ reasonable security measures. Instead, the current federal regulatory framework merely outlines the minimal requirements for FFLs to obtain and maintain a license. To obtain a license, federal law requires prospective FFLs to be at least 21 years of age, maintain premises from which to conduct business, and certify that business operations are not prohibited by state and local law.<sup>10</sup> Once granted a license, FFLs are required by law to conduct background checks in accordance with the Brady Act<sup>11</sup> and may not complete transfers to prohibited purchasers.<sup>12</sup>

Beyond these nominal requirements, the scope of federal regulation governing the business practices of FFLs is limited to recordkeeping and reporting requirements. As part of the recordkeeping requirements, FFLs must maintain records of sales and other dispositions, which includes i) ensuring that the ATF's Firearms Transaction Record, or Form 4473, is completed by a non-FFL transferee; and ii) that all imported or manufactured firearms are appropriately identified by a serial number.<sup>13</sup> Under the reporting requirements, FFLs must i) notify the ATF when multiple firearms are sold or transferred to the same person within a five-day period; ii) notify the ATF within 48 hours after the loss or theft of firearms in the licensee's inventory, and iii) transfer required records to the licensee's successor or the ATF when the licensee ceases business operations.<sup>14</sup> Currently, there are no federal legal requirements that gun dealers engage in safe business practices and implement basic security requirements to ensure that the guns they sell do not end up in the hands of prohibited purchasers and/or criminals.

### *Federal regulation is not effectively enforced*

<sup>9</sup> Bureau of Alcohol, Tobacco, Firearms and Explosives, *Safety and Security Information for Federal Firearms Licensees*, ATF Pub. 3317.2 (2010) available at <https://www.atf.gov/firearms/docs/guide/safety-and-security-information-federal-firearms-licensees-atf-p-33172/download>

<sup>10</sup> 18 U.S.C. § 923(d); 923(i)

<sup>11</sup> Pub. L. No. 103-159, 107 Stat. 1536 (1993).

<sup>12</sup> 18 U.S.C. § 922(g); (o)

<sup>13</sup> *Id.* at § 923(g)(1)(A); (2)

<sup>14</sup> *Id.* at § 923(g)(5)-(6)



Even where the federal framework does impose requirements on gun dealers, they are woefully underenforced. The ATF is both underfunded by design and constrained by acts of Congress. In fact, in its 2016 Congressional Budget Submission, the ATF explained that, despite a budget that has remained relatively stagnant for 10 years, its “workload and mission requirements have exponentially increased.”<sup>15</sup> The agency does not have the resources or the will to provide meaningful oversight of gun dealers. Most notably, although the ATF is authorized to revoke the licenses of dealers cited for *willful* noncompliance, the agency does not appear to consistently use its authority to hold licensees accountable for offenses that indicate trafficking, such as: straw sales; sales to self-identified prohibited purchasers; failure to report multiple sales; and failure to report lost or stolen firearms.

A report issued in 2013 by the Department of Justice Office of Inspector General (OIG) found that the ATF consistently failed to meet its own internal inspection targets. The report cites chronic resource constraints and the competing statutory mandate to inspect licensed explosive dealers as an obstacle to the ATF’s ability to meet its FFL inspection targets.<sup>16</sup> The report indicates that dealers typically go *11 years* without federal inspection. As the only federal agency with oversight authority over the gun industry, ineffective enforcement by the ATF requires that states act.

Worryingly, even when inspections do occur and violations are found, little or no remedial action is taken. ATF inspection reports obtained by Brady and analyzed by the *New York Times*<sup>17</sup> found the ATF routinely downgraded the remedial actions recommended by Industry Operations Inspectors (IOIs), who are charged with inspecting individual FFLs, despite repeated indications that licensed dealers had violated federal law. Area Supervisors and Directors of Industry Operations habitually reversed IOIs recommendations to revoke the licenses of FFLs even when egregious repeat violations were uncovered. This included dealers who failed to perform background checks, who sold firearms to customers who stated they were felons or other prohibited purchasers, and dealers who otherwise seriously and repeatedly violated the law. In fact, the reports reveal that less than 0.5% of inspections resulted in the revocation of a license despite widespread noncompliance.<sup>18</sup>

#### *Federal regulators know how to deter theft from licensed dealers*

ATF understands that FFLs are the first line of defense to prevent theft of firearms and their diversion to the criminal market. Accordingly, ATF urges FFLs to adopt safe business practices and security measures to ensure that criminals are unable to easily obtain guns in its report titled *Safety and Security Information for Federal Firearms Licensees*. The requirements provided in the Firearms Dealers’ Safety Act are consistent with the measures provided by ATF. Specifically, ATF devotes an entire section of the report to specific actions FFLs should take to “reduce...vulnerability to theft/loss and personal injury.” The topics covered include: structural security to ensure the premises are able to deter physical

<sup>15</sup> *Congressional Budget Submission, Fiscal Year 2016*, US Department of the Treasury, ATF, February 2015, at 10, [www.edit.justice.gov/sites/default/files/jmd/pages/attachments/2015/02/02/26.\\_bureau\\_of\\_alcohol\\_tobacco\\_firearms\\_and\\_explosives\\_atf.pdf](http://www.edit.justice.gov/sites/default/files/jmd/pages/attachments/2015/02/02/26._bureau_of_alcohol_tobacco_firearms_and_explosives_atf.pdf)

<sup>16</sup> 2013 OIG Report, *supra* n. 1, at 27.

<sup>17</sup> Ali Watkins, *When Guns Are Sold Illegally, ATF is Lenient on Punishment*, N.Y. TIMES (Jun. 3, 2018), available at <https://www.nytimes.com/2018/06/03/us/atf-gun-store-violations.html>

<sup>18</sup> 2013 OIG Report, *supra*.

intrusions; inventory security to ensure that firearms are inoperable and secure during and after business hours; and employee screening and business practices developed to deter transfers to straw purchasers or prohibited persons.<sup>19</sup> These recommendations are consistent with provisions enacted in the Firearms Dealers' Safety Act.

**States, including Maryland, already supplement the federal framework but more can be done**

In light of prolific enforcement failures at the federal level, it is up to state and local governments to ensure that gun dealers in their jurisdiction operate responsibly. Maryland is among the states that have already acted to supplement the federal regulatory structure by requiring gun dealers to obtain state-level licenses. By enacting the Firearm Dealers' Safety Act, Maryland will further address a dangerous gap in federal regulation by ensuring that gun dealers employ safe business practices and security measures known to be effective at slowing the flow of firearms from the legal market to the criminal market.

The Baltimore County Council recently used its authority to deter gun theft from retailers by enacting legislation to require firearms dealers in the jurisdiction to certify adequate theft prevention measures. Like with the Firearms Dealers' Safety Act, the measure passed by the Baltimore County Council is consistent the ATF's guidance on security best practices.

Other states also require gun dealers to implement minimum security requirements to prevent theft of their inventory. For example, New Jersey requires all licensed dealers to implement physical security measures on the business' premises during and after business hours. Dealers are required to submit security plans to the agency with oversight authority for approval to ensure they are adequate for deterring theft.<sup>20</sup> Likewise, California requires firearms dealers to implement specific physical security measures, such as rendering inventory inoperable during business hours and locking inventory in steel vaults after business hours. Further, California law requires licensed dealers to complete background checks on any employees that will be transferring firearms on the dealer's behalf to ensure the employee is not prohibited from possessing a firearm. Similar to the Firearms Dealers' Safety Act, the state of Connecticut requires burglary systems and employee background checks.<sup>21</sup>

**Brady strongly urges the Maryland Senate Committee on Judicial Proceedings to pass SB 816, the Firearms Dealers' Safety Act.**

<sup>19</sup> Bureau of Alcohol, Tobacco, Firearms and Explosives, *Safety and Security Information for Federal Firearms Licensees*, ATF Pub. 3317.2 (2010) available at <https://www.atf.gov/firearms/docs/guide/safety-and-security-information-federal-firearms-licensees-atf-p-33172/download>

<sup>20</sup> N.J. Admin. Code. § 13:54-6 et seq.

<sup>21</sup> Conn. Gen. Stat. § 29-37d - 37f

# **MPGVNickWilson\_FAV\_SB816**

Uploaded by: wilson, nick

Position: FAV



## Volunteer Testimony

### **SB 816-Support Firearm Dealers' Safety Act Nick Wilson Senate Judicial Proceedings Committee February 20, 2020**

Dear Chairman Smith and Members of The Committee:

My name is Nick Wilson and I live in Baltimore City. I have been a criminal justice researcher with an emphasis in gun violence policies for more than 10 years. I am here to urge you to support SB 816, better known as the Firearms Dealers' Safety Act.

The number of firearms stolen from gun stores each year is on the rise. Between 2012 and 2016, the ATF found that burglaries of Federal Firearm Licenses (FFLs) rose by 48% and FFL robberies increased by 175%.

Even if we strengthen our background check and licensing systems until it's impossible for a person prohibited from possessing a firearm to purchase a gun, there will be a steady supply of crime guns if a couple of guys with nothing but saws and bolt cutters from a local hardware store can steal 200 firearms from one gun store. This is exactly what happened in North Carolina. Within three years, 68 of the 200 guns were recovered at crime scenes in five states, including multiple robberies, two homicides and a sexual assault. After one of the burglars was caught, he said of stealing guns from a gun store: "It's like taking candy from a baby."

Maryland gun stores are not immune from this growing national trend. Baltimore County experienced 10 burglaries or attempted burglaries in 2018 and 2019, and 45 firearms were stolen after burglars drove a Subaru Outback through the wall of gun stores in Howard Montgomery County. If we are going to keep Maryland communities safe, we must ensure all gun dealers meet a baseline level of security and send a message to gun traffickers that we are not a state to be messed with.

I am sympathetic to the considerable responsibility, and sometimes outside pressure, placed upon each one of you by the introduction of any firearms legislation. As a researcher focused on evaluating the effectiveness of gun violence prevention policies, one of my primary tasks is to understand and find common ground between diverse stakeholders. This usually includes gun owners, law enforcement, survivors, licensed firearms dealers, and

community members tired of the daily gun violence. As you're likely well aware, this is not always an easy task in today's political climate.

Fortunately, the Firearms Dealers' Safety Act will not require you to carefully weigh in the balance community safety and the Second Amendment. The requirements listed in SB 816 are already considered best practices and used by many licensed dealers in Maryland around the U.S. They also mirror the recommendations of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), the International Association of Chiefs of Police (IACP), and the National Shooting Sports Foundation (NSSF) because weak security measures threaten the safety of gun store employees, law enforcement, and crime victims.

ATF is the federal law enforcement agency with the authority to inspect gun dealers, manufacturers, and importers. "It's clear from the crime guns we recover every day that firearms stolen from FFL retailers are a serious threat to public safety," said then-ATF head Thomas Brandon. Despite ATF leadership recognizing the threat posed by lax gun dealer security, the underfunded and understaffed agency was able to inspect fewer than 8% of all FFLs in 2018. Furthermore, federal law does not require specific security measures for gun stores. We cannot afford to wait until the federal government acts - we must give Maryland State Police the information and tools they need to provide oversight and accountability.

In a IACP report about reducing gun violence, police chiefs across the country recommended state-level regulations that include "requiring background checks on all gun dealer employees, enhancing record keeping regarding gun sales within their jurisdictions, or heightening other security measures, including requiring that FFLs secure their inventory."

NSSF, the firearms industry trade association, also recognizes the need to improve security to protect public safety. "As an FFL you have a professional obligation to ensure your firearms don't make it into the hands of criminals. Far too many FFL burglaries that occur could have been prevented by improved safeguards." NSSF's Operation Secure Store assessment program is designed to help firearm retailers and gun ranges to strengthen security procedures and combat theft.

**In sum, I urge you to support SB 816 because the Firearms Dealers' Safety Act is one of the rare firearm policies where there is broad consensus that reasonable common sense measures must be taken to save lives.**

# **MPGVCIFClintWolcott\_FAV\_SB816**

Uploaded by: wolcott, clint

Position: FAV



## Volunteer Testimony



**SB 816-Support**  
**THE FIREARMS DEALERS' SAFETY ACT**  
**TESTIMONY OF THE CRITICAL ISSUES FORUM: ADVOCACY**  
**FOR SOCIAL JUSTICE OF MONTGOMERY COUNTY, MARYLAND AND TEMPLE SINAI**  
**FEBRUARY 20, 2020**  
**BEFORE THE SENATE JUDICIAL PROCEEDINGS COMMITTEE**

Honorable Chair William Smith, Vice-Chair Jeffrey Waldstreicher, and Members of the Senate Judicial Proceedings Committee:

**The Critical Issues Forum: Advocacy for Social Justice (CIF)**, which was formed by a group of synagogues in Montgomery County, appreciates the opportunity to provide its testimony in support of SB 816, the Firearms Dealers' Safety Act. Composed of Temple Beth Ami, Kol Shalom, and Adat Shalom, CIF represents over 1,750 households and 3 branches of Judaism: Reform, Conservative, and Reconstructionist. CIF serves as a vehicle for our congregations to speak out on policy issues that relate to our shared values.

In addition to the three congregations that make up the CIF, Temple Sinai, which has an award-winning gun violence prevention program, also supports this testimony. Temple Sinai is a Reform congregation located in northwest Washington DC; its membership includes some 1200 households, more than half of which reside in Maryland, mainly in Montgomery County.

Jewish tradition emphasizes the sanctity and primary value of human life. The Bible commands us, "Thou shalt not murder" (Exodus 20:13) and "Do not stand idly by the blood of your neighbor" (Leviticus 19:16). The Talmud teaches us that "he who takes one life it is as though he has destroyed the universe and he who saves one life it is as though he has saved the universe" (Mishnah Sanhedrin 4:5). Our tikkun olam/repair the world mission also remains strongly rooted in and inspired by Jewish traditions which urge us to eschew violence and protect life, *e.g.*, Isaiah (2:4) urges us to "beat [our] swords into plowshares and [our] spears into pruning hooks."

The dehumanizing of the human being and the carelessness with which human life is taken stand in direct violation of these affirmations of our tradition. Gun violence is a widespread problem in our society and we must address the issue in its various forms, from mass shootings and hate crimes to domestic violence and suicide. CIF is committed to supporting common sense laws that save lives and thus affirm the value of all human life.

Limiting gun violence requires limiting the flow of firearms to those who are most likely to commit violent crimes, especially untraceable guns sold through the black market and outside the current system for regulating firearms sales.

Most firearms enter the consumer market through gun dealers, who are the critical link between manufacturers/distributors and the general public. There are over 56,000 individuals who have been issued federal firearms licenses (federal firearms licensees or “FFLs”) that allow them to operate as dealers.<sup>1</sup> According to a review of this subject prepared by the Giffords Law Center, “Even though all guns that are sold to the public, including guns that end up recovered in crimes, originate with dealers, dealers are subject to very little federal oversight.”<sup>2</sup>

Federal oversight of gun dealers is woefully inadequate. The Federal Bureau of Alcohol, Tobacco, and Firearms (“ATF”) is hamstrung in policing FFLs. It may conduct only one unannounced inspection of each dealer per year, the burden of proof for license revocation is extremely high, serious violations of firearms laws have been classified as misdemeanors rather than felonies, and the agency has been significantly underfunded for many years. A 2004 report by the US Department of Justice’s Office of the Inspector General (“OIG”) found that ATF’s program for inspecting FFLs, including gun dealers, importers, manufacturers, collectors, and pawnbrokers, was “not fully effective for ensuring that FFLs comply with federal firearms laws because inspections are infrequent and of inconsistent quality, and follow-up inspections and adverse actions have been sporadic.”<sup>3</sup> While a 2013 follow-up report by OIG found that ATF had made some improvements in its inspection program, over 58% of FFLs had not been inspected within the past five years due, in part, to a lack of resources.<sup>4</sup>

The inadequacy of federal oversight is also due to the limited scope of federal regulation itself. Although federal law provides for licensing and recordkeeping, it lacks straightforward preventive mechanisms to ensure that FFLs manage their businesses so as to restrict the flow of firearms for illicit purposes. For example, federal law does not provide for: background checks

<sup>1</sup>Bureau of Alcohol, Tobacco, Firearms, and Explosives website, <http://www.atf.gov/about/foia/ffl-list.html>.

<sup>2</sup>Giffords Law Center, <https://lawcenter.giffords.org/gun-laws/policy-areas/gun-sales/gun-dealers/>

<sup>3</sup> **Office of the Inspector General, Evaluation and Inspections Division, U.S. Department of Justice, *Inspection of Firearms Dealers by the Bureau of Alcohol, Tobacco, Firearms and Explosives (July 2004)*: i**, <http://www.justice.gov/oig/reports/ATF/e0405/final.pdf>

<sup>4</sup> **Office of the Inspector General, Evaluation and Inspections Division, U.S. Department of Justice, *Review of ATF’s Federal Firearms Licensee Inspection Program (Apr. 2013)*: ii**, <http://www.justice.gov/oig/reports/2013/e1305.pdf>.



of employees of firearms dealers; requirements for safe storage of firearms; or requirements that would ensure that gun purchases can be properly identified.

Nevertheless, the ATF believes licensed firearms dealers need to be “the first line in maintaining the security and lawful sale of firearms” and has issued detailed guidance on safe business practices and security measures that dealers can adopt to reduce instances of theft.<sup>5</sup> However, ATF cannot require their adoption – they remain voluntary. There are no federal laws that mandate adoption of such measures, leaving the burden of effective regulation to state and local governments.

The need for such state regulation is apparent. An important and growing source of black market guns is thefts and diversions from gun dealers.

According to the most recent ATF data, there were 463 FFL burglaries and robberies in 2018 alone. From these incidents, 5,981 firearms were reported as stolen.<sup>6</sup> Licensed dealers in Maryland have been subject to many gun thefts in recent years. Between 2012 and 2018, the ATF reports that 603 guns were stolen from gun dealers in the state. More recently, in June 2019, burglars stole firearms from both Fox’s Firearms in Fulton and United Gun Shop in Rockville. For United Gun Shop, this was the third time it had been targeted since 2017 when a pair of burglars were able to steal 30 guns in 90 seconds.<sup>7</sup> In August 2016, 36 guns were stolen during an armed robbery at Blue Fins in Dundalk, and in February 2014, more than 70 handguns were stolen by burglars from Fred’s Sport and Furniture in Waldorf.<sup>8</sup>

This trend in gun thefts from licensed dealers is expected to accelerate; firearms are very lucrative on the black market.<sup>9</sup> This is a major concern to law enforcement, as stolen guns are easily diverted to individuals who are not able to purchase guns legally. Moreover, stolen guns become untraceable, making it more difficult to identify potential suspects and thus thwart the ability of law enforcement officers to solve violent crimes.

In addition to the issue of robberies from gun stores, there is also a significant insider threat resulting in missing guns, which may be diverted to the black market. During the past four years, ATF records for Maryland indicate that there were 620 guns reported missing by gun dealers. Specifically, dealers reported an average of 26 loss reports a year with an average of

<sup>5</sup> Bureau of Alcohol, Tobacco, Firearms and Explosives, *Safety and Security Information for Federal Firearms Licensees*, ATF Pub. 3317.2 (2010), <https://www.atf.gov/firearms/docs/guide/safety-and-security-information-federal-firearms-licensees-atf-p-33172/download>

<sup>6</sup> The Bureau of Alcohol, Tobacco, Firearms, and Explosives “Federal Firearms Licensee Burglary and Robbery Statistics - Calendar Year 2014-2018”, <https://www.atf.gov/infographics/federal-firearms-licensee-burglary-and-robbery-statistics-calendar-year-2014-2018> (published February 4, 2019).

<sup>7</sup> WJLA “WATCH: Masked suspects enter Md. gun shop, smash cases, steal multiple handguns and rifles,” <https://wjla.com/news/crime/police-multiple-handguns-rifles-stolen-from-md-gun-shop> (March 9, 2017).

<sup>8</sup> Center for American Progress “Stolen Guns in America,” <https://www.americanprogress.org/issues/guns-crime/reports/2017/07/25/436533/stolen-guns-america/> (published July 25, 2017).

<sup>9</sup> WJLA “ATF: Licensed gun store burglaries/robberies up 52 percent nationwide,” <https://wjla.com/news/local/atf-reports-increase-in-gun-store-robberies-nationwide-including-va-md> (published March 10, 2017).

155 guns missing.<sup>1</sup> [footnote] The public safety issue with missing guns, whether they're sold by dealers or employees on the black market, stolen or simply lost, is that they will reappear in connection with a crime.

Legislation is needed immediately to protect Marylanders by preventing guns from being stolen and diverted to the criminal market. The International Association of Chiefs of Police recommends that state and local governments enact their own dealer licensing requirements because they can respond to specific community concerns, and because state and local oversight of licensees helps reduce the number of corrupt dealers.<sup>10</sup>

The Firearm Dealers Safety Act, SB 816, will institute reasonable mandatory business practices designed to ensure consistently responsible sales and prevent diversion to the criminal market, as follows:

1. The bill amends current law to require that licensed dealers keep electronic records of all their gun purchases and sales, including video and audio recordings of these transactions, and make these records available to state and federal authorities when requested. Section 5-145(a)(1)-(6).
2. Section 5-145(a)(7) provides that each licensed dealer develop a written standard operating procedure to protect its inventory from unauthorized access or theft, including locks, exterior lighting, surveillance cameras, and an alarm system.
3. Section 5-145(f) requires the State to inspect the inventory and records of each licensed dealer at least once every two years.
4. Section 5-147 of the bill prohibits dealers from employing individuals who are prohibited from possessing a firearm, requires annual criminal background checks of employees and checks of applicants for employment.
5. Section 5-148 of the bill would require dealers to maintain liability insurance covering acts committed by an individual using a firearm sold, rented, or transferred by the dealer.
6. Section 5-150 of the bill requires that, during business hours, firearms be stored in a locked display case or other secure location and that any firearm displayed to a customer be rendered inoperable with a trigger lock or other device. Outside of business hours, firearms must be locked in a vault, safe, reinforced display case with shatterproof glass.

By enacting the Firearm Dealers Safety Act, Maryland would join nine other states and the District of Columbia that have enacted legislation to prevent legal guns from being diverted to the criminal market. In addition, nine states and the District of Columbia have already passed

<sup>10</sup> Bureau of Alcohol, Tobacco, Firearms, and Explosives Reports: <https://www.atf.gov/file/142186/download> ; <https://www.atf.gov/file/133371/download> ; <https://www.atf.gov/file/124546/download> , and <https://www.atf.gov/resource-center/docs/undefined/osii508fflthefts-lossescy16pdf/download> .

<sup>11</sup> Int'l Ass'n of Chiefs of Police (IACP), *Taking a Stand: Reducing Gun Violence in Our Communities* (2007): 14, <https://www.theiacp.org/resources/taking-a-stand-reducing-gun-violence-in-our-communities>.

laws requiring FFLs to comply with security measures determined by the states, seven states require employee background checks, and four states require dealers to report lost or stolen firearms.<sup>11</sup>

The experience in these other states demonstrates the effectiveness of this approach. For example, New Jersey has enacted comprehensive security measures for firearm dealers and has only 10 recorded firearms stolen from licensed gun dealers between 2012 and 2016. During that same period, Maryland had 354 firearms stolen from firearm dealers. A September 2010 report by Mayors Against Illegal Guns concluded that routine inspections of gun dealers provide law enforcement with more opportunities to “detect potential indications of illegal gun activity, including improper recordkeeping or a dealer whose gun inventory does not match their sales records.”<sup>12</sup> The report presented data showing that states that do not permit or require inspections of gun dealers are 50% more likely to be the source of guns later used in crimes. Additionally, a 2009 study found that cities in states that comprehensively regulate retail firearms dealers and require businesses to undergo regular compliance inspections have significantly lower levels of gun trafficking.<sup>13</sup>

Rigorous standards for firearms dealers are not only effective, they are supported by responsible gun owners and the public generally. A May 2012 poll found that 79% of NRA members and 80% of non-NRA gun owners support requiring gun retailers to perform employee background checks—a measure also endorsed by the National Shooting Sports Foundation, the trade association for the firearms industry.<sup>14</sup> In another poll, NRA members (90%) and non-NRA member gun owners (93%) also agreed that “irresponsible gun dealers who break the law by knowingly selling guns to unqualified purchasers should be held accountable to the maximum extent of the law.”<sup>15</sup>

The Firearms Dealers Safety Act is a sensible approach to address a critical public health problem, the ease with which firearms flow from legitimate sources to the black market. **CIF and Temple Sinai urge this committee to support SB 816** to ensure that licensed firearm dealers implement effective practices and security measures to guard against gun theft and diversion.

<sup>12</sup> Giffords Law Center “Gun Dealers,” <https://lawcenter.giffords.org/gun-laws/policy-areas/gun-sales/gun-dealers/>.

<sup>13</sup> Mayors Against Illegal Guns, Trace the Guns: The Link Between Gun Laws and Interstate Gun Trafficking (Sept. 2010): 26-27, <http://www.tracetheguns.org/report.pdf>.

<sup>14</sup> Daniel W. Webster et al., “Effects of State-Level Firearm Seller Accountability Policies on Firearms Trafficking,” 86 J. Urban Health (July 2009): 525.

<sup>15</sup> Press Release, Mayors Against Illegal Guns, New Poll of NRA Members by Frank Luntz Shows Strong Support for Common-Sense Gun Laws, Exposing Significant Divide Between Rank-and-File Members and NRA Leadership (July 24, 2012), <http://mayorsagainstillegalguns.org/html/media-center/pr006-12.shtml>

<sup>16</sup> Dr. Frank Luntz/Word Doctors for Mayors Against Illegal Guns, America’s Gun Owners Support Common Sense Gun Laws (Dec. 2009), 9, [http://www.mayorsagainstillegalguns.org/downloads/pdf/luntz\\_poll\\_slides.pdf](http://www.mayorsagainstillegalguns.org/downloads/pdf/luntz_poll_slides.pdf).





# **Jeffrey Adams\_unf\_sb816**

Uploaded by: Adams, Jeffrey

Position: UNF

Jeffrey Adams  
2209A Amoss Mill Road  
Pylesville, MD 21132  
[jeffadams55@gmail.com](mailto:jeffadams55@gmail.com)

**HB636 (SB646) OPPOSE**  
**HB1257 (SB816) OPPOSE**  
**HB910 (SB958) OPPOSE**  
**HB591 OPPOSE**  
**HB1501 OPPOSE**  
**HB1104 OPPOSE**  
**HB1261 OPPOSE**

Honorable State of Maryland House Judiciary Committee,

I find myself again this year as a Maryland resident under the threat of becoming a common criminal simply by my choice to be a law-abiding owner of firearms.

I am a peace-loving 50 year resident of Maryland, I raised my family here, vacationed in Ocean City and Deep Creek Lake, I retired from government service at Aberdeen Proving Ground, Maryland has been a wonderful place to live, until now. I feel threatened because later in life I chose to pick recreational shooting as a hobby that I could enjoy with friends and family.

I do everything right; my firearms are locked in a safe; my ammunition is locked in yet another safe, but somehow, according to some legislators in Maryland, my ownership of firearms is causing crimes of gun violence to increase across the state. I fail to see the connection, since the only time my guns come out of my safe is when they are under my complete control and used for target shooting and recreational purposes only. The obvious truth is there is no connection, plain and simple.

It's all too obvious that criminals don't care about or complete background checks; they don't care how many rounds are in the magazine, the more the better; they don't care who they get a gun from; they don't lock up their guns at night; they don't report stolen firearms, they're probably holding one, and that list goes on and on...

I find the lack of general knowledge about firearms and the steps it takes to legally purchase a firearm in Maryland by some of our elected officials surprising. I feel that they could work toward better understanding what they are trying to legislate, because when the misinformation flows through them to the anti-gun groups and to the public, it incites fear and mistrust, and discourages open and honest conversation. The Second Amendment community stands for safety, education, responsibility, accountability, and freedom. Let's all try that for a while.

Yours in Freedom,  
Jeffrey Adams  
2209A Amoss Mill Road  
Pylesville, MD 21132

# **ChristopherBenedict\_unf\_SB816**

Uploaded by: benedict, Christopher

Position: UNF



Good afternoon,

My name is Christopher Benedict, I live at 702 Dayspring Dr, Odenton, MD 21113. I am writing to voice **my opposition** to the following bills:

- **HB636 and SB646**
- **HB910 and SB958**
- **HB1257 and SB816**
- **HB1261**
- **HB1078**

I believe this collection of bills is an unacceptable overreach being made by legislators who fail to understand that stricter gun control laws DO NOT impact criminals' access to firearms. The only people who will be impacted by this legislation are law-abiding citizens who wish to exercise their 2nd amendment rights. The root cause of these crimes needs to be addressed, and if that cannot be addressed, more citizens should be responsibly armed to protect themselves, their families, and those around them.

Specifically, I am vehemently opposed to the idea that legislation can be enacted to control what I print on my 3D printer. I don't even understand how that would be enforced. Secondly, The expansion of the definition of an assault long gun is absolutely unreasonable. The controls in place are already unacceptable, adding more control will not keep anyone safer. Lastly, state legislators should have no say over how school districts allocate funds with the exception of funds provided by the state itself.

Sincerely,  
Christopher L. Benedict  
chrisbdaemon@gmail.com

**WilliamUphoff\_unf\_sb816**

Uploaded by: benedict, Christopher

Position: UNF

**OPPOSED to:**  
**HB636(sb646)**  
**hb910(sb958)**  
**hb1257(sb816)**  
**hb958(sb910)**  
**HB591**  
**HB1104**  
**hb1261**  
**sb646(hb636)**  
**sb816(hb1257)**  
**hb1078 hb1501**

William Uphoff  
823 Judy lane Pikesville  
[cubhillconst@aol.com](mailto:cubhillconst@aol.com)

Do any of these bills take the words a GOOD AND SUBSTANTIAL REASON out of the ccw for Maryland? probably not so instead of going after the real problem CRIMINALS you are making it harder and more expensive for law-abiding citizen to own a fire arm for protection against the people that don't follow the law anyway so these bills HB636(sb646) hb910(sb958)hb1257(sb816)hb958(sb910)HB591 HB1104 hb1261 sb646(hb636)sb816(hb1257)hb1078 hb1501 are not a good idea in my opinion . These bills do not allow myself and any law-abiding citizen to have in my home and be able to carry for self-protection and to be able to protect my family

## **RichardBodine\_unf\_sb816**

Uploaded by: Bodine, Richard

Position: UNF

Richard Bodine  
8120 Overlook Drive  
Frederick, MD 21702  
[arlby@hotmail.com](mailto:arlby@hotmail.com)

The following are the Senate Bills in Committee that I **strongly oppose**.

**SB39**  
**SB208**  
**SB422**  
**SB646**  
**SB958**  
**SB968**

Sincerely, Richard Lyle Bodine

NOTE: I am the son of the son of Democrats. All my ancestors on both sides have been Democrats for well over 140 years.  
In the past 20 years more than half of my relatives have left the Democratic Party.

Stop taking Bloomberg's \$\$\$\$

**Dr. Edward W. Christoffers\_unf\_SB816**

Uploaded by: Christoffers, Dr Edward

Position: UNF

February 18, 2020

Dr. Edward W. Christoffers  
28505 Cedar Point Road  
Easton, MD 21601-822

[ewc1944@gmail.com](mailto:ewc1944@gmail.com)

443-746-2433

I am writing today to express my opposition to a series of gun control legislation due to be heard soon. These pieces of legislation while well intended will do little or nothing to solve the violence we see today.

The 2018 FBI unified Crime Report notes that there were 14,123 homicides during the year. 1,515 involved knives or sharp objects (10.72%), 672 involved hands and feet (4.76%) and only 532 involved a rifle or shotgun (3.77%). Modern sporting rifled were only a small percentage of that total. This compares to 11,000 drunk driving deaths, 47,000 suicides and the 330,000 lives lost to abortions. One should also consider that the suicide rate in Australia remained constant after they adopted their gun banning legislation.

A CDC Study reported a 94% reduction in firearms fatalities from 1933-2017 while at the same time the private ownership and concealed carry of firearms increased dramatically. If firearms were to blame for the violence in our society one would assume that gun related deaths would be much higher due to the increase in legally owned guns.

#### HB 636 Access to Firearms Storage **OPPOSE**

This legislation would make myself and my wife significantly less safe since it would require us to store our self defense firearms in a way that would make them unavailable for use should our rural home be a target for thieves or home invaders.

#### HB 910 and HB 958 Untraceable Firearms. **OPPOSE**

This legislation is a solution looking for a problem. Americans have been making firearms of all types since Colonial times. Those firearms used in some shootings were manufactured and sold illegally. This bill would encumber all honest citizens who build firearms for the pleasure of having a hand-crafted firearm they built to use hunting and at the range.

#### HB 591 and HB1501 Lost or Regulated Firearm Reporting **OPPOSE**

What would this legislation accomplish except for creating a list of lost or stolen firearms? Rarely are firearms found at a crime traced back to the criminal. This law would at best trace the firearm back to the owner who reported it missing or stolen. On it's face it would create additional work for an already overburdened law enforcement agency with no significant benefit to public safety.

#### HB1104 Regulated Firearms Transfers **OPPOSE**

Apparently, designed to eliminate the fictitious gun show and private transfer/sale issue. Sales of firearms at gun shows are already regulated if the seller is in the business of selling firearms. Since most sellers at shows are licensed FFL's all sales are conducted with a background check. Those who are selling a few of their private collection are in the distinct minority. All online sales where the seller resides in a different state must be conducted with an FFL to FFL transfer and the required background check. All instate sales are done face to face and the seller can assess the purchaser and terminate the sale if they suspect the purchaser to be a prohibited person. this legislation would make it illegal for me to loan one of my firearms to a relative or friend. For instance, I and a group of my friends are at deer camp and my friends rifle malfunctions. Based on this legislation I could not loan my friend of many years my spare firearm unless I accompanied him to his deer stand are remained with him while he hunted. This legislation is burdensome and unnecessary.

#### HB 1257 Licensed Firearms Dealers **OPPOSE**

This bill would place an additional burden on already heavily regulated legal business establishments. It is excessive regulation with no real public benefit, and it is designed to force legal firearms retailers out of business.

#### HB 1261 Assault Long Guns and Copycat Weapons **OPPOSE**

As noted in my introduction firearms of this type (Modern Semi-automatic Sporting Arms) are involved in an incredibly small number of homicides. They have been the victim of a massive public relations campaign designed to dupe the public into believing that they are evil. If these types of firearms were a problem one would think that they would be involved in many more homicides. Estimates indicate that there were over 16 million modern semi-automatic sporting arms legally owned by American citizens. Politicians and the media have created a myth about these firearms which is patently untrue. John F. Kennedy once said, "The greatest enemy of the truth is very often not the lie-deliberate, contrives and dishonest – but the myth – persistent, persuasive and unrealistic." This is the myth developed around these firearms and it is totally unrealistic. Finally, this legislation is written so poorly that it would include most shotguns used for hunting and sport shooting along with most if not all semi-automatic firearms.



# **Chris K Cockrum\_unf\_sb816**

Uploaded by: Cochrum, Chris

Position: UNF

My wife and I oppose the following gun bills because we are fed up with infringing limits on our Second Amendment / Civil rights:

- HB636 (SB646)
- HB910 (SB958)
- HB591
- HB1104
- HB1261
- HB1257 (SB816)
- HB1078
- HB1501

We will be voting according to this issue in future elections.

Sincerely,

Chris K Cockrum

Lee W Cockrum

485 Greenwood Street

Odenton, MD 21113

[ckc@cockrum.net](mailto:ckc@cockrum.net) / [lee@cockrum.net](mailto:lee@cockrum.net)

<https://cockrum.net>

# **Edward W. Cotter\_unf\_sb816**

Uploaded by: Cotter, Edward

Position: UNF

Edward W. Cotter  
239 Treherne Rd  
Timonium, MD 21093  
[ewc@georgetown.edu](mailto:ewc@georgetown.edu)

*Re: "Untraceable Firearms"*

[HB910](#) and [SB958](#)

I oppose these bills because I would like to spend some time building my own firearms when I cut back my business to semi-retirement. This has been a legal activity for a long time.

*"Assault Long Guns and Copycat Weapons"*

[HB1261](#)

I oppose this bill. I've been interested in purchasing an AR-15 at some point. Now you want to tax them to oblivion? I've read that more murders are committed with hammers than with rifles. Why do you need this? What's next?

*"Licensed Firearms Dealers (Firearms Dealers' Safety Act)"*

[HB1257](#)

I oppose this bill on principle, although it does not affect me directly. If you want to do this, apply these standards to all businesses. It's unfair to single out licensed firearms dealers.

*"Access to Firearms - Storage Requirements"*

[HB636](#) and [SB646](#)

I view these bills with great trepidation and oppose them. I have no minors in my home, but I have a developmentally disabled daughter who lives at home. All guns are locked, either in a gun safe or with an internal gun lock. Any determined person "could" possibly overcome these security measures. My daughter knows better than to attempt to defeat the codes on the safes. A burglar is likely to give up before he can break the codes. Why should I be legally at risk for what "might" happen?

*"Permit to Carry, Wear, or Transport - Required Courses"*

[SB422](#)

I oppose this bill. I have taken many firearms courses, including ones which deal with "the competent handling of a firearm" and with "situational awareness". To obtain a Wear and Carry Permit in Maryland, which is recognized as constitutionally guaranteed in many states, I now need to sit through the same two courses every year? Training is good, but this is ridiculous. Carry permit holders commit crimes at a lower rate nationwide than police. Why should the most responsible subgroup in America be treated as if they were mindless?

**Derrick faith\_\_unf\_sb816**

Uploaded by: Faith, Derrick

Position: UNF

To our representatives concerning HB636/SB646, HB910/SB958, HB1257/SB816, HB958/SB910, HB591, HB1078, HB1501, HB1261.

You are our elected representatives and thus are duty bound to represent the wishes of your constituents.

We the people are **strongly opposed to ANY** additional regulations on law-abiding gun owners in MD. These laws will do nothing to prevent crime and will only further infringe on the rights of the good people that you are supposed to represent.

Not only will these ridiculous laws be completely ineffective against crime, but they will serve only to turn good law-abiding working tax payers into instant criminals.

Instead of making more laws like these we would all be better served if you actually made harsher penalties for the criminals who will always ignore such laws.

Derrick faith  
14438 hollow rd  
Hancock, md 21750  
[Dfshooter62@gmail.com](mailto:Dfshooter62@gmail.com)

# **Lindsey Frear\_unf\_sb816**

Uploaded by: FREAR, LINDSEY

Position: UNF

Lindsey Frear  
SB816  
Opposed

Good afternoon. My name is Lindsey Frear and I oppose this bill. Last year, I came with my father to testify against another bill that tried to restrict guns. My father is a gunsmith who is a law abiding citizen just like all of his customers. If this goes into action, me, my parents, and my two younger siblings will have to leave the state I was born and raised in. All of my father's customers could drive a few hours to Pennsylvania or West Virginia where they wouldn't have to deal with this because why would they want to be spied upon? My father wouldn't be able to continue his gunsmithing in Maryland.

Another factor against this bill is that it goes against the fourth and fifth amendments. The fourth amendment states that there may be no unreasonable searches and seizures. Putting a camera in a gunsmith's shop and sifting through the videos is unreasonable and the customer has to testify against themselves which brings the fifth amendment into it. It would be a mess to deal with every time and my father could and would be dragged into a bunch of legal proceedings even if a customer were falsely accused, and clearly someone wanting their gun fixed doesn't want to go through putting themselves at risk of being unfairly targeted.

George Washington said, "A free people ought not only be armed and disciplined, but they should have sufficient arms and ammunition to maintain a status of independence from any who might abuse them, which would include their own government." You try to pass these bills on me, my family, and countless other innocent people who just want to bear a firearm without all of these burdens. You are chasing us out. In school, we are taught not to bully our fellow classmates so I ask you now, not to bully your fellow citizens with these useless laws that will damage our state and drive us from the land I was born.

I respectfully request an unfavorable report.



**Walt Frear\_unf\_SB816**

Uploaded by: FREAR, WALTER

Position: UNF

Walter Frear

Bill - SB816

I OPPOSE THIS LEGISLATION

My name is Walt Frear, and I live with my wife and 3 young children in southern Frederick County Maryland. I am a licensed firearms dealer, and owner/operator of a custom gunsmithing practice. I have been working full time as professional gunsmith in Maryland for over 22 years after graduating from the Colorado School of Trades gunsmithing program. I have called Maryland my home my entire life, with the exception of when I was away at school, and when I served in the military. My wife is the owner/operator of a successful CPA accounting practice here in Maryland, and we are both deeply invested in our kid's schools, church, and well established in our community. We live in a small town neighboring the town my wife and I grew up in. My 3 year old son and I get haircuts at the same barber where I got my first haircut with my dad when I was 3. We live 10 minutes from my wife's sister and her family, and our kids are able to grow up playing together. We also live around the corner from grandparents who have a close bond with our kids. Living local allows us to share these special memories and more with them. However, if this legislation becomes law, we will be faced with the decision: do we give up a lifestyle we spent 2+ decades building together and start over in another state, or do I give up the skills I spent a lifetime developing and find a new line of work? (One heck of a decision to make given that we have done nothing wrong...). Honestly, most of my clients won't want to be under the intense surveillance this legislation requires simply to have their lawfully owned private property repaired; nor will they be willing to pay the increased costs that complying will bring. Many clients will simply travel to neighboring states to have their firearms repaired, or mail them to an out-of-state gunsmith; both of which are beyond the reach of this legislation.

I believe this law, like most new gun laws have very little to do with Public Safety and everything to do with politicians trying to punish their political opponents. The people of Maryland deserve better!... Maryland should be a place where traditions are valued, neighbors with different opinions are respected, and friendship is more important than politics...

I oppose this legislation and I respectfully request an unfavorable report.

## **DonaldGarrison\_unf\_sb816**

Uploaded by: Garrison, Donald

Position: UNF

OPPOSED TO:

- HB636 and SB646
- HB910 and SB958
- HB1257 and SB816
- HB1261
- HB1078

Donald Garrison  
[Boatsbm1@verizon.net](mailto:Boatsbm1@verizon.net)  
1901 Bowen way  
Forest Hill Md 21050

I oppose any kind of gun legislation that keep me from enjoy shoot and hunting and the ability to teach my family. I am a Patriot member of the NRA and have use their help in the safe use of my guns and teach my family.

The only thing I see is legislation to restrict my freedom as a law abiding citizen and nothing to stop the gangs in Baltimore from destroying the city. Charge me more tax and fee and restrict my right a citizen of Md and the USA

Put criminals behind bars. Do criminals get back ground check? Are they retired from the military, have tax paying job or the just buy government legislator, so citizens are unarmed and not able to defend themselves. I want all government legislator to give up their arm protection and see they will walk the streets.

Put legislation forward that protect citizens and not restrict their freedom and laws that put criminals behind bars and get good conservative judges that follow the constitution and the state of Md.

**David J. Geiman Jr.\_unf\_sb816**

Uploaded by: Geiman, David

Position: UNF

I writing you to express my **opposition** to the following bills.

**HB 636**

**HB 910**

**HB 1257**

**HB 958**

**HB 591**

**HB 1104**

**HB1261**

**HB1501**

All of these bills hinder, restrict or penalize the law abiding citizen for owning, selling, transferring, repairing or loaning a firearm to other law abiding citizens. I think the focus should be on arresting, prosecuting and jailing (for the full sentence) the criminals in this state who are just running wild.

As a law abiding citizen and gun owner I would never loan a firearm to someone whether a friend or family member who shouldn't have it. The legislature continues to dance around the real problem crime! My personal opinion is that the education system in this state educate our young people on firearms and the proper use of them, and how deadly they can be.

It is also my personal opinion that if the murderers that commit these mass shootings were facing the death penalty they may think twice.

Please feel free to share my comments with your colleges and the committee.

THANKS,

David J. Geiman Jr.

Taneytown, MD 21787

djgeiman1@gmail.com

## **Robert Gillman\_unf\_sb816**

Uploaded by: Gillman, Robert

Position: UNF

**The Bill #'s I OPPOSE:**

**HB 636**  
**SB 646**  
**HB 910**  
**SB 958**  
**HB 1257**  
**SB 816**  
**HB 958**  
**SB 910**  
**HB 1078**  
**HB 591**  
**HB 1501**  
**HB 1104**  
**HB 1261**

Thank you for your time and providing this opportunity for our voice to be heard.

I write this with great concern as a 20+ year contributing member to Maryland society, a 30+ year service member, a father, and a law abiding citizen. I've seen the effects of gun control both stateside and abroad and deeply oppose what the state of Maryland has currently in place as well as these proposed measures. Our Second Amendment is second only to our first and is so in order to protect and preserve that right. As such I'm formally stating my opposition to the bills listed below.

Robert Gillman  
Address: 2917 Kildaire Dr. Parkville, MD 21234  
[Tffrost@comcast.net](mailto:Tffrost@comcast.net)



# **Noah Hayward\_unf\_sb816**

Uploaded by: Hayward, Noah

Position: UNF

Dear Sir or Madam,

I urge you to oppose the following bills (listed in order of their currently scheduled hearings):

- SB646/HB636 (Public Safety - Access to Firearms)
- SB816/HB1257 (Public Safety -Licensed Firearms Dealers)
- SB958/HB910 (Criminal Law - Untraceable Firearms)
- HB1078 (Education - No Funding for Firearms Act)
- HB591 (Public Safety - Lost or Stolen Regulated Firearms - Reporting)
- HB1104 (Public Safety - Regulated Firearm - Transfer)
- HB1501 (Public Safety - Regulated Firearm - Reporting Lost or Stolen)
- HB1261 (Public Safety - Assault Long Guns and Copycat Weapons)

None of these bills, if they were to become laws, would improve public safety. Instead, already-law-abiding citizens, hunters, and licensed firearm dealers (like myself and many of my family and friends) would only be further burdened, while criminals would only continue to ignore the law.

To the extent you are able, through reasonable legislation, I respectfully request that you work to ensure that Maryland's existing (and already overly-restrictive, in my opinion) laws are enforced, rather than passing more laws, based on feelings - or worse, politics - that will not actually contribute to the good of the people of Maryland.

Thank you for your consideration,

Noah Hayward

12307 Ericole Court  
Ellicott City, MD 21042  
[noahjhayward@gmail.com](mailto:noahjhayward@gmail.com)  
443-831-4900

## **James Hersey\_unf\_sb816**

Uploaded by: Hersey, James

Position: UNF

I oppose the following list of stunningly bad anti-firearms and anti-firearms dealer legislative bills:

HB636 SB646

HB910 SB958

HB1257 SB816

HB1078

HB591 HB1501

HB1104 HB1261

It would seem that many of the members of the Maryland State legislature have gone out of their way this year to attack the rights of legitimate firearms owners, while doing nothing worthwhile to actually stem crime. These bills are an example of legislative actions continuing to do nothing but unnecessarily over regulating, while not alleviating any problem. This is simply pandering to the far left and squandering the public purse.

Vigorous enforcement of existing laws would be more than sufficient to combat crime, combined with the judicial system actually convicting *and* incarcerating criminals. The city of Baltimore is a prime example of the actual problem of the revolving door lack of justice. Further restricting lawful firearms owners is not the answer. Pandering to the anti-firearms segment is not the answer.

As a voter and a tax payer I vehemently oppose the listed bills.

James Hersey  
5503 Woodridge Dr  
Waldorf MD 20601  
[herseyj@hotmail.com](mailto:herseyj@hotmail.com)

## **markHeavner\_unf\_SB816**

Uploaded by: Hevener, Mark

Position: UNF

From:  
Mark Hevener  
106 Village Way  
Mt. Airy, Maryland 21771

Email:  
[trauma915@gmail.com](mailto:trauma915@gmail.com)

Concerning:  
**HB636 (SB646) OPPOSED**  
**HB910 (SB958) OPPOSED**  
**HB958 (SB910) OPPOSED**  
**HB519 OPPOSED**  
**HB1104 OPPOSED**  
**HB1261 OPPOSED**  
**SB646 (HB636) OPPOSED**  
**SB816 (HB1257) OPPOSED**  
**HB1501 OPPOSED**  
**HB1078 OPPOSED**

Each and every one of these Bills only affects and restricts law abiding gun owners and does nothing to reduce criminal activity use of firearms.

These Bills, in effect, cost restrict the average income citizens from exercising their constitutional right under the 2nd Amendment. They actually penalize citizens for exercising their right to bear arms.

I see these proposals as an attack upon my freedoms and will support judicial lawsuits to challenge the same.

Please give due consideration to the above statement.

## **PeterHundertnark\_UNF\_SB816**

Uploaded by: Hundertmark, Peter

Position: UNF

I oppose the following bills coming up for review.

**HB636 (SB646)**

**SB646 (HB636) & SB816 (HB1257)**

**HB910 (SB958) & HB1257 (SB816)**

**HB1078**

**HB598 (SB910)**

**HB591, HB1104**

More attempts to take rights away from law abiding citizens. Criminals by definition do not follow the law, so these will NOT have the effect intended.

Just to make criminals out of the very people who follow the law. I will not support any delegate who approves or votes for these bills.

Thank you for your time.

Peter Hundertmark  
7390 Pindell School Rd.  
Fulton, MD 20759

[Phundertmark@hotmail.com](mailto:Phundertmark@hotmail.com)



## **Matthew P kopp-unf\_sb816**

Uploaded by: Kopp, Matthew

Position: UNF

Re: RE: OPPOSE all new gun control bills and HB 1261

Dear elected official and staff:

I stand with the Firearms Policy Coalition and other pro-rights groups in **OPPOSITION to HB 1261 and the dozens of other gun control bills introduced this session.**

These new proposals will only crack down on those wishing to defend themselves with commonly owned guns--it will not make a difference to the criminal element. MD already has some of the strongest gun control laws in the nation.

These new proposed measures are untenable, especially because we all know criminals are not going to follow them at all. We know this because after the last big gun control laws in Maryland passed it had no significant impact on gun crime; in fact it, increased and hasn't come down.

It's time representatives in Annapolis finally stand up and defend the entire Bill of Rights and stop catering to anti-rights extremists like Michael Bloomberg.

Please make a stand and OPPOSE HB 1261, as well as the dozens of other proposed gun control bills.

Thank you.

Sincerely,  
Matthew P kopp  
[fireemt13@yahoo.com](mailto:fireemt13@yahoo.com)

2118 OLD EASTERN AVE  
MIDDLE RIVER, MD 21220

# **Kenneth Kurzmilller \_unf\_sb816**

Uploaded by: Kurzmilller, Kenneth

Position: UNF

**I strongly oppose the following bills.**

**HB636 (SB646)**

**HB910 ( SB958)**

**HB1257 (SB816)**

**HB958 (SB910)**

**HB1078**

**HB591**

**HB1104**

**HB1501**

**HB1261**

I do not believe these bills will promote gun safety. However I do believe these bills will make personal safety more difficult.

I would like us to consider more gun legislation. That which promote gun ownership, possession and make it less expensive “To keep and bear arms”.

Thank you,  
Kenneth Kurzmiller  
20123 Gunpowder Road  
Manchester, Maryland 21102

**Torrey R. Lambert\_unf\_sb816**

Uploaded by: Lambert, Torrey

Position: UNF

Torrey R. Lambert

2920 Duncan Rd

White Hall, MD

21161

[Torrey.R.Lambert@gmail.com](mailto:Torrey.R.Lambert@gmail.com)

As a registered, active voter in Maryland, I OPPOSE the following House / Senate Bills in the 2020 Session. I would request you do not support these bills.

1. HB591: Public Safety – Lost or Stolen Regulated Firearm – Reporting
2. HB636 / (SB646): Public Safety - Access to Firearms - Storage Requirements
3. HB910 / (SB958): Criminal Law - Untraceable Firearms
4. HB1078 / (SB910): Public Safety - Education - Firearm Funding (No Funding for Firearms Act)
5. HB1104: Public Safety - Regulated Firearms - Transfer
6. HB1257: Public Safety - Licensed Firearms Dealers (Firearms Dealers' Safety Act)
7. HB1501: Public Safety – Regulated Firearms – Reporting Loss or Theft

Regards

Torrey R. Lambert

## **LouisLibertini\_unf\_Sb816**

Uploaded by: Libertini, Louise

Position: UNF

I oppose the following Gun Bills.

HB 636  
SB646  
SB816  
HB1257  
HB910  
SB958  
HB1078  
HB591  
HB1104  
HB1261

These bills will do nothing to deter the criminal. They will just infringe upon the honest citizen's ability to protect themselves and their property.

Louis Libertini  
915 Cold Spring Road  
Middle River, Md., 21220  
[captlou59@verizon.net](mailto:captlou59@verizon.net)



# **NickNechay\_unf\_sb816**

Uploaded by: Nechay, Nick

Position: UNF

Dear Committee,

I am writing this email to express my opposition to the following gun laws:

- HB636
- HB1257
- HB910
- HB1078
- HB958
- HB591
- HB1501
- HB1104
- HB1261

As a Maryland resident for my entire life, I feel that our constitutional "right to bear arms" is already greatly limited. The addition of these bills will do nothing to make our state a safer place. It will only limit the ability of tax paying/ law abiding citizen to protect themselves and their families. Please stop limiting the freedom of the responsible citizens of Maryland.

**Nick Nechay**

Independent Refrigeration Services, Inc

Phone: (717) 227-2200

Email: [nnechay@irsnh3.com](mailto:nnechay@irsnh3.com)

# **George H Nitzel III\_UNF\_sb816**

Uploaded by: Nitzell, George

Position: UNF

**HB636 (SB646) - OPPOSE**  
**HB910 (SB958) - OPPOSE**  
**HB1257 (SB816) - OPPOSE**  
**HB958 (SB910) - OPPOSE**  
**HB591 - OPPOSE**  
**HB1104 - OPPOSE**  
**HB1261 - OPPOSE**  
**HB1078 - OPPOSE**  
**HB1501 - OPPOSE**

My Name is George H Nitzel III  
My Address is 11300 Pulaski Highway, White Marsh MD 21162  
My email address is [george@ghnitzel.com](mailto:george@ghnitzel.com)

As a US Citizen, Tax Payer, Business Owner, Christian, and Lawfully Abiding Maryland Resident I take my constitutional rights seriously.

Any and all of the Gun bills listed below are an infringement to my constitutional Second Amendment Rights.

The Second amendment states a well-regulated militia, being necessary to the security of a free state, the right of the people to keep and bear arms, SHALL NOT BE INFRINGED.

Therefore I oppose any and all of these bills that alter, impose or infringe my rights under the Second Amendment .

Respectfully  
George H Nitzel III



11300 Pulaski Highway  
White Marsh, MD 21162  
Phone: 410-335-0200  
Fax: 410-335-3477  
Cell: 443-463-3337

# **Art\_Novotny\_UNF\_SB816**

Uploaded by: Novotny, Art

Position: UNF

## **OPPOSE SB816**

Public Safety - Licensed Firearms Dealers

Art Novotny  
2/20/20

This bill would create incredible financial burdens on firearms dealers, that will necessarily have to be passed on to the consumer, us. Isn't it bad enough that I'm going to have to pay to upgrade my gun safes to some impossible standard under SB646?

The state is also going to have to invest significant resources into checking compliance of all these new requirements...otherwise, they just won't be followed. Those are resources that could be much more effectively used fighting crime elsewhere in Maryland.

I'm confused about whether the insurance requirement could even work. Is it possible for a company to be held liable for the actions of their customers (especially after such exhaustive background checks and regulations)? Would not the state, which allowed the sale to happen, carry some liability? If insurance can work that way, why aren't we requiring it for car dealers, so I don't have to keep paying GEICO every month?

Firearms dealers are *Federal* Firearms Licensees (FFLs). Let the feds regulate them, as they have been, with *federal* resources. Put Maryland's resources to better use going after the bad guys, for once.

Thank you.

# **Katie\_Novotny\_UNF\_SB816**

Uploaded by: Novotny, Katie

Position: UNF

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*Written Testimony of Katie Novotny in Opposition of SB816*

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February 20, 2020

I am a member of Multiple Gun Rights organizations. Maryland Shall Issue, Associated Gun Clubs, Maryland State Rifle and Pistol Association, and the National Rifle Association. I am a certified Range Safety Officer with the NRA. I compete in multiple shooting events such as Steel Challenge, 3-gun, small bore, and vintage military rifle matches. I am an avid firearms collector. I oppose SB816.

This bill is seeking to punish business owners, for the crimes committed by brazen criminals. The draconian requirements required by this bill are unnecessary and punitive. There isn't much stopping someone who is willing to get together a group of individuals, steal multiple cars, and then use those to ram through the front of a building in order to gain access.

The liability insurance requirement for dealers for acts of another using a firearm sold, rented, or transferred is especially egregious. Any firearm sold by an FFL, long gun or handgun, will have had a background check performed on the purchaser. Either through the NICS for a long gun, or through the Maryland State Police for a handgun. These agencies are advising of a "proceed" or "not disapproved" on these background checks. The FFL is simply providing the information on the FF4473 or the 77r to the appropriate agencies, as supplied by the purchaser. The FFL is not performing the background check. A background check is simply a snapshot in time. It is not an indicator of future behavior. If an FFL has suspicions about a sale, they already have the right to refuse a sale. They do this on a regular basis. Holding a FFL responsible for the future actions of another, simply because of a business transaction is absurd. Are we going to hold car dealerships to the same standard?

Another unnecessary part of this bill is the requirement that any firearm that is displayed to a customer being rendered inoperable. An unloaded firearm does not present a safety hazard. As a customer myself, this is unacceptable. I must be allowed to work the action to check for operation, as well as work the trigger to get a feel for the trigger pull. This is particularly important when inspecting used firearms. There is no safety reason to require this.

Because of these reasons above, I request an unfavorable report.

Katherine Novotny

District 7

443-617-7568



Katie.Novotny@hotmail.com

# **CarlODonnells\_unf\_sb816**

Uploaded by: odonnel, carl

Position: UNF

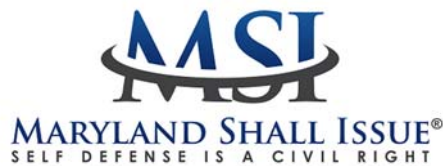
My name is Carl M O'Donnell of district 19 and I am writing in **opposition to SB816/HB1257.** This past year Maryland Gun stores faced several bold attacks from criminals. Instead of sympathy we are discussing new burdens for them. Please listen to local FFL license holders and collaborate with them in pursuing criminals. All too often FFLs report suspicious and disqualified potential buyers only to go unanswered by law enforcement. These new bills are attacking the victim rather than supporting local business owners. Please pass an unfavorable review of this bill.

carlcarlodonnell@gmail.com

# **Pennak\_President\_MSI\_UNF\_SB0816**

Uploaded by: Pennak, Mark

Position: UNF



February 20, 2020

## WRITTEN TESTIMONY OF MARK W. PENNAK, PRESIDENT, MSI, IN OPPOSITION TO SB 816 and HB 1257

I am the President of Maryland Shall Issue (“MSI”). Maryland Shall Issue is an all-volunteer, non-partisan 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 Maryland and of the Bar of the District of Columbia. I recently 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, federal 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, personal protection in the home, personal protection outside the home and in muzzle loader. I appear today as President of MSI in opposition to SB 186 and HB 1257.

### **These Bills and Current Law: The New Burdens And Conflicts**

This State imposes very strict regulation of firearms dealers, requiring that these dealer obtain a state-issued firearms license and submit to inspections on a regular basis by the Maryland State Police. See, e.g., MD Code Public Safety §5-110, §5-114, §5-115, §5-145. Additional regulatory burdens on dealers were imposed with the enactment of SB 281, the Firearms Safety Act of 2013, including amending MD Code Public Safety 5-145 to impose additional record keeping requirements. In addition to state regulation, all these dealers are also Federal Firearms Licensees (“FFLs”) and are thus heavily regulated by the ATF, a component of the U.S. Department of Justice. The ATF likewise imposes substantial record-keeping requirements, along with many other requirements concerning the conduct of business, on FFLs. See 18 U.S.C. § 923; 27 C.F.R. Part 478.

These bills would impose a vast array of new burdens on State licensed dealer. First, it would amend MD Code Public Safety 5-145 to require that the dealer keep ELECTRONIC records. The ATF does not permit electronic records. Rather FFL records must be kept in a “bound form” under a format specified in the regulations. See 27 C.F.R. §478.125(e). Any alternative format for records must receive special permission, requiring an application, and may not be employed by the FFL until approval is received. *Id.* at §478.125(h). Thus, this bill would effectively require the dealer to keep two sets of records, one in electronic format and one in paper format (as required by the ATF). Indeed, the bills effectively negate the provision in existing law (Section 5-145(a)(4)) that provides that “[r]ecords maintained under 18 U.S.C. § 923(g)(1)(a) may be used to satisfy the requirements of this section, if the Secretary is granted access to those records.”

The bills would also amend Section 5-145 requiring dealers to keep new records, including requiring the dealer to **CREATE A VIDEO AND AUDIO RECORDING OF ALL RECEIPTS, SALES, AND OTHER DISPOSITIONS OF FIREARMS CONDUCTED AT THE DEALER'S BUSINESS**. The dealer must also keep each such audio and video record **FOR AT LEAST 1 YEAR AFTER THE RECEIPT, SALE, OR DISPOSITION** and submit any such record or recording to the State Police upon demand. The dealer is required to supply such records not only to the State Police upon request, but also to a Federal agency and to any party in a civil suit simply upon releasing a discovery demand. This release of information to a federal agency is contradicted by 27 C.F.R. § 478.126, which sets forth the manner in which information is released to the ATF, and it authorizes submission only of information "required by this subpart." That regulation precludes any alternative form of submission without special approval. The mandated release of information in a civil suit is breathtaking in scope and includes disposition information of the name, date of birth, address and driver's license number of the non-licensee and a copy of Federal Form 4473. 26 C.F.R. §478.125(e).

The bills also amend Section 5-145 to impose a host of new security procedures and hardware, requiring the dealer to **DEVELOP AND KEEP A WRITTEN STANDARD OPERATING PROCEDURE TO PROTECT INVENTORY FROM THEFT OR UNAUTHORIZED ACCESS**. That procedure must include locks, exterior lighting, surveillance cameras and an alarm system. No such requirements are imposed upon FFLs by the federal regulations.

The bills also amend MD Code Public Safety 5-147 to impose new employment criteria on dealers. Under this provision, as amended, a dealer may not only not employ a prohibited person, but is also barred from employing any person **FOR WHOM THE LICENSED DEALER HAS NOT OBTAINED A STATE AND NATIONAL CRIMINAL HISTORY RECORDS CHECK AS REQUIRED BY THIS SECTION**. The bills go on to require the dealer to apply, by June 30 of **EACH YEAR, TO THE CENTRAL REPOSITORY FOR A STATE AND NATIONAL CRIMINAL HISTORY RECORDS CHECK BY SUBMITTING TO THE CENTRAL REPOSITORY: TWO COMPLETE SET OF FINGERPRINTS OF THE EMPLOYEE** and **THE FEE** for such checks. Finally, if the dealer should fail to comply with any of these new requirements (or any of the requirements of existing law), the dealer may be fined \$1,000 for the first offense and imprisoned for 3 **YEARS** and a fine of \$10,000 or **BOTH** for the second such offense.

Next, the bills create a new Section 5-148 to provide that **A LICENSED DEALER SHALL AT ALL TIMES MAINTAIN LIABILITY INSURANCE FOR THE ACTS OF ANOTHER USING A FIREARM SOLD, RENTED, OR TRANSFERRED BY THE LICENSED DEALER IN THE AMOUNT OF AT LEAST \$2,000,000**. A violation of this provision is punishable by a civil penalty of \$1,000 on first offense and 3 years in prison and a \$10,000 fine for any subsequent offense. The bills also mandate, in new Section 5-149, that a dealer **REPORT ANY THEFT OF A FIREARM FROM THE LICENSED DEALER'S PLACE OF BUSINESS TO A LAW ENFORCEMENT AGENCY, AS DEFINED IN § 3-201 OF THIS ARTICLE, IMMEDIATELY UPON DISCOVERING THE THEFT**. Any failure to "immediately" report the theft is punishable by a \$1,000 civil fine on the first offense and 3 years imprisonment and a \$10,000 fine for any second offense. Nowhere does the bill explain why dealers should be required to insure against the harm caused by the wrongful acts of another where the sale was otherwise fully legal. At common law, the negligent or unlawful acts of another are an intervening or superseding cause for which the dealer cannot be held liable. See *Pittway*

*Corp. v. Collins*, 409 Md. 218, 248-49 (2009); Section 442 of the Restatement (Second) of Torts. Dealers are not guarantors against harm inflicted by otherwise lawful purchasers.

Finally, the bills create a new Section 5-150 which governs day-to-day business activities. Under this Section, the dealer must STORE EACH FIREARM IN A LOCKING DISPLAY CASE OR ANOTHER SECURE LOCATION THAT IS INACCESSIBLE TO CUSTOMERS and ENSURE THAT EACH FIREARM THAT IS DISPLAYED TO A CUSTOMER IS RENDERED INOPERABLE WITH A TRIGGER LOCK OR ANOTHER MECHANISM. This provision effectively kneecaps the dealer. Virtually every potential purchaser demands to work the action and pull the trigger of a firearm before making any purchase. Banning this practice will ensure that the buyer will go elsewhere. After business hours, the bills mandate that the dealer SHALL LOCK ALL FIREARMS IN: (I) A VAULT; (II) A SAFE; OR (III) A REINFORCED DISPLAY CASE WITH SHATTERPROOF GLASS. This requirement just adds to the costs. The first violation by dealer is punishable by a \$1,000 civil fine while any subsequent violation is punishable by 3 years imprisonment and a \$10,000 fine.

### **The Burdens Imposed By These Bills Will Drive Dealers Out Of Business:**

It is evident that the intent of these bills is to drive dealers out of business. Most dealers are small businessmen and women. The costs imposed by these new requirements will be devastating to their businesses. This impact has constitutional implications. Law-abiding citizens have a Second Amendment to acquire or purchase firearms under *District of Columbia v. Heller*, 554 U.S. 570 (2008), and *McDonald v. City of Chicago*, 561 U.S. 742, 768 (2010). The Second Amendment also confers “ancillary rights necessary to the realization of the core right.” *Teixeira v. City of Alameda*, 873 F.3d 670, 677 (9th Cir. 2017) (en banc). See also *Richmond Newspapers v. Virginia*, 448 U.S. 555, 579–80 (1980) (“[F]undamental rights, even though not expressly guaranteed, have been recognized by the Court as indispensable to the enjoyment of rights explicitly defined.”).

That right to acquire firearms necessarily implies a right to sell firearms because the right to acquire would be meaningless in the absence of sellers. Thus, *Teixeira* and other courts have recognized that “[c]ommerce in firearms is a necessary prerequisite to keeping and possessing arms for self-defense.” *Teixeira*, 873 F.3d at 682. See also *United States v. Marzzarella*, 614 F.3d 85, 92 n.8 (3d Cir. 2010) (“If there were somehow a categorical exception for [commercial] restrictions, it would follow that there would be no constitutional defect in prohibiting the commercial sale of firearms. Such a result would be untenable under *Heller*.”). Plainly, under these principles, the State may not make it illegal for a dealer to sell firearms. Nor may the State accomplish the same result by making it so burdensome to sell firearms that few businesses would engage in such sales. See, e.g., *Fairbank v. United States*, 181 U.S. 283 (1901) (noting “the great principle that what cannot be done directly because of constitutional restriction cannot be accomplished indirectly by legislation which accomplishes the same result.”); *Lebron v. Secretary*, 710 F.3d 1202, 1217 (11th Cir. 2013) (“where an individual’s federal constitutional rights are at stake, the state cannot accomplish indirectly that which it has been constitutionally prohibited from doing directly”).

The risk of that “untenable result” is quite real. Dealers are limited in the extent to which they are able to pass along to their customers the huge costs imposed by these bills, as

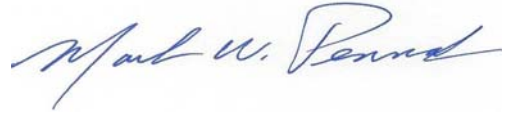
higher prices alone will drive down sales. Dealers also face the risk of going to prison for 3 years if they violate these many detailed and varied provisions. The bills create strict liability crimes, as the bills do not require a knowing violation or impose any other *mens rea* requirement. One minor slip up for the second time and, **viola**, jail time. In sum, the bills impose huge costs on dealers by imposing detailed and costly requirements and then severely criminalize a failure to abide by these many and varied requirements. Few dealers will risk jail time just in order to do business where doing business is fraught with the risks of an unknowing violation of these new requirements. For example, under these bills all a dealer need do in order to earn prison time is to be late in submitting an employee's fingerprints by June 30 or inadvertently letting the \$2,000,000 insurance policy lapse. Many dealers, especially smaller FFLs, will simply cease doing business so as to avoid the risk of these draconian punishments for such minor paperwork violations.

The higher costs imposed on Maryland dealers will also will also make it impossible for Maryland dealers to compete with out-of-state dealers. It is perfectly legal for law-abiding citizens of Maryland to purchase long guns in other states, where dealers are not subjected to these costly requirements. Specifically, ever since 1986, with the enactment of PL 99-308, 100 Stat. 449 (May 19, 1986), residents of one state may purchase long guns in any other state "if the transferee meets in person with the transferor to accomplish the transfer, and the sale, delivery, and receipt fully comply with the legal conditions of sale in both such States." 18 U.S.C. § 922(b)(3). Similarly, MD Code Public Safety § 5-204 provides that a resident of Maryland who is eligible to purchase a long gun in Maryland may purchase a long gun in an "adjacent" state, defined to include Delaware, Pennsylvania, Virginia or West Virginia. More than half of all manufactured firearms are long guns. <https://www.statista.com/statistics/215540/number-of-total-firearms-manufactured-in-the-us-by-firearm-category/>. Out-of-state dealers will be able to substantially undercut the prices that Maryland dealers would have to charge in order to pass along the costs imposed by these bills. Market forces alone will ensure that few Maryland dealers will survive over time.

Indeed, what is true for long gun sales may well soon be true with respect to the sale of handguns. Federal law currently bans sales of handguns to out-of-state residents. See 18 U.S.C. § 922(a). That ban was sustained against a Second Amendment challenge in *Mance v. Sessions*, 896 F.3d 699 (5th Cir. 2018). However, the plaintiffs in that suit have filed a petition for certiorari with the Supreme Court in that case and that petition has been pending since last Term. See *Mance v. Barr*, No. 18-663 (filed Nov. 19, 2018). The case is obviously being held by the Supreme Court pending a decision in *NYSRPA v. NYC*, No. 18-280, *cert. granted*, 139 S.Ct. 939 (Jan 22, 2019). The Supreme Court heard oral argument in *NYC* on December 2, 2019, and a decision is expected by June. After a merits decision in *NYC*, we expect the Court to vacate the decision in *Mance* and remand it for further consideration in light of the Court's decision in *NYC*. It is thus entirely possible that the federal ban on interstate sales of handguns will be struck down after *NYC*. Any similar state ban would meet the same fate. At that point, the market pressures on Maryland dealers will preclude their survival because price conscious purchasers will simply make all of their firearms acquisitions in other states. We urge an unfavorable report.



Sincerely,

A handwritten signature in blue ink that reads "Mark W. Pennak". The signature is written in a cursive style with a large, prominent initial 'M'.

Mark W. Pennak  
President, Maryland Shall Issue, Inc.  
mpennak@marylandshallissue.org

# **Cooper Pollard-\_unf\_sb816**

Uploaded by: Poland, Cooper

Position: UNF

**HB636 (SB646), SB646 (HB636) & SB816 (HB1257), HB910 (SB958) & HB1257 (SB816), HB1078 , HB598 (SB910), HB591, HB1104, HB1104 OPPOSED**

Good Morning,

I am emailing you to tell you how unfair the current gun bills are that are being proposed. As an avid hunter and sport shooter none of these bills will actually help keep guns out of the hands of criminals or felons. These bills will hurt ALL gun owners and especially those that may struggle financially already as the re-registration fee costs more than the ATF charges when you register a firearm with them. I do support the requirement of a background check being made when any gun is sold. I believe more responsible laws such as a universal background checks for ALL new gun owners and firearms training such as is required per the conceal carry laws in Maryland now would be a great way to educate and protect new gun owners. Limiting magazine size, outlawing "assault weapons", and requiring re-registration of guns is not a deterrent for the criminals we are trying to prevent from obtaining firearms. A better deterrent would be to make and enforce laws that imprison felons caught with firearms to a mandatory jail time of no less than 5 years.

I hope you will see the lack of depth in these proposed gun bills and push for more good common sense gun laws that would actually help your constituents when it comes to gun related issues. Please vote no on these bills.

Thank You,  
Cooper Pollard

**[pollards\\_towing@earthlink.net](mailto:pollards_towing@earthlink.net)**

# **Casey L. Raiford\_unf\_sb816**

Uploaded by: Raiford, Casey

Position: UNF

Thank you for your service to the state of Maryland and your support of Second Amendment rights.

I'm writing to express my **opposition to:**

**HB0004**

**HB0035**

**HB0302**

**HB0591**

**HB0636**

**HB0910**

**HB1078**

**HB1104**

**HB1257**

**HB1261**

Casey L. Raiford  
2287 Snowfall Ct  
Odenton, MD 21113  
CR07@gmail.com

Thanks again;

# **Marty Restucci\_unf\_SB816**

Uploaded by: Restucci, Marty

Position: UNF

**OPPOSED TO THE FOLLOWING**

**HB636, HB910, HB958, HB591, HB1104, HB1078, HB1261, HB1501, SB816, SB646**

These Gun bills need to stop attacking our 2nd Amendment

Go after the bad guys they won't abide by them you are just making the good guy a criminal

I hunt & fish the Chesapeake Bay these Bills are just wrong!!!!!!!

Stop this Many are leaving the State NOW!

Marty Restucci

McGlothlin Road

Conowingo MD. 21918

[marty.restucci@gmail.com](mailto:marty.restucci@gmail.com)

**BENELLI USA\_UNF\_SB816**

Uploaded by: SANTOS, TREVOR

Position: UNF





**BENELLI U.S.A. CORPORATION  
AND  
STOEGER INDUSTRIES, INC.  
STRONG OPPOSITION TO  
MARYLAND SENATE BILL 816**

**SENATE BILL 816- Public Safety - Licensed Firearms Dealers (Firearms Dealers' Safety Act) OPPOSE**

The owners and employees of Benelli U.S.A. and its wholly-owned subsidiary Stoeger Industries, Inc. strongly oppose SB 816 (the "Firearms Dealers' Safety Act). As written, SB 816 would require Benelli and Stoeger to move their importation, warehousing and shipping facility out of Pocomoke City, Maryland (where it currently exists) to a location out of the State.

SB 816 provides, among other things, that after business hours a licensed firearm dealer must lock all firearms (presumably in its possession) in a vault, safe or shatterproof reinforced display case. What the author of this legislation may not have realized is that in order to do business selling firearms in Maryland, importers and distributors located in the State of such products must also be licensed as a Maryland firearm dealer. That means that the provisions of SB 816 apply to both Benelli U.S.A. and Stoeger Industries, neither of whom have locations open to the public and both of whom primarily function as firearm importers and distributors of those products to licensed dealers and law enforcement departments throughout the U.S.

At its facility in Pocomoke City, where these functions are performed, both companies receive, store and ship nationally as well as internationally hundreds to thousands of firearms each week. It would be virtually impossible for that many firearms to be placed in vaults or safes each night and then taken out for shipping and processing each day. In fact, the two companies secure firearms in their possession from theft by securing (through means both prefer not to make public) the building itself in which they are housed. If these two companies are now forced to move all firearms into vaults to be built or safes to be bought, both companies would have to evaluate the more reasonable option of simply moving their operations to another State.

This is not the only defect in SB 816. SB 816 also provides that all employees of a licensed dealer must, on an annual basis, have their background checked and fingerprints taken. Benelli

U.S.A. and Stoeger Industries already perform background checks when first hiring an employee but by requiring this be repeated each year for the approximately 75 employees in both companies would be costly and pointless. Is there really a likelihood that a person's fingerprints would change from year to year? On a statewide basis, how much would this cost dealers and exactly what benefit would be derived?

That absence of relationship between the cost and onerous burden of the various provisions in SB 816 exists with respect to numerous other provisions in the Bill. For example, SB 816 contains several provisions relating to record-keeping and reporting of stolen or missing firearms that are already required by federal law. The Bill is also vague as, for example, when it states that "A licensed dealer shall report any theft of a firearm. . . *immediately* [emphasis added] upon discovering the theft" without defining what is meant by "immediately". (Within one minute? Within one hour? That day? Etc.) Federal law requires such reporting within 48 hours.

Both Benelli U.S.A. and Stoeger Industries occasionally sell firearms to their employees. Under SB 816, the companies would have to ask an employee to retrieve such a firearm, put a lock on it and then show it to the fellow employee for purchase. In other words, SB 816 would require employees who handle and are around firearms every day to put a lock on a single firearm simply because they now want to purchase it (and then only at the moment of purchase). This makes no sense and is another example of how the requirements of SB 816 are both burdensome and disconnected from any risk they are intended to address.

SB 816 is also unrealistic. It requires licensed dealers to obtain at least \$2 million in liability insurance *for the acts of another* [emphasis again added] and imposes a penalty of up to 3 years in prison for failure to comply but fails itself to consider what would happen if no insurance company wanted to write a policy of that type. In fact, insurance companies might be willing to write coverage for events over which the company has control but would likely laugh at the notion of being asked by a firearm dealer to issue a \$2 million policy to cover the acts of a criminal. According to the U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives, for firearms recovered at crime scenes (which is only a minute percentage of all firearms ever sold), the average time between when a licensed dealer sells a firearm and that firearm is recovered by law enforcement is over 11 years. The firearm in question might have passed through numerous intervening owners in that time span but SB 816 would still want the dealer to obtain insurance to cover misuse of the gun, misuse over which the dealer had, and could not reasonably be construed as having, control. Firearm dealers have a difficult time now getting insurance. SB 816 would guarantee they could not and would send them to prison for their failure to comply with an impossible administrative burden.

No evidence is adduced proving why the statewide costs and burdens of SB 816 are justified by its onerous provisions. SB 816 is a perfect example of a solution in search of a problem.

For these and other reasons we recommend that SB 816 be rejected.

**BERETTA\_UNF\_SB816**

Uploaded by: SANTOS, TREVOR

Position: UNF





**BERETTA U.S.A. CORP.**  
**STRONG OPPOSITION TO**  
**MARYLAND SENATE BILL 816**

**SB 816- Public Safety – Licensed Firearms Dealers- OPPOSE**

The owners and employees of Beretta U.S.A. living and working in Maryland strongly oppose SB 816 (the "Firearms Dealers' Safety Act).

SB 816 provides, among other things, that after business hours a licensed firearm dealer must lock all firearms (presumably in its possession) in a vault, safe or shatterproof reinforced display case. What the author of this legislation may not have realized is that in order to do business selling firearms in Maryland, importers and distributors located in the State of such products must also be licensed as a Maryland firearm dealer. That means that the provisions of SB 816 apply to Beretta U.S.A. even though that Company's location in Accokeek, Maryland is not open to the public.

Beretta U.S.A.'s Accokeek facility was used for 30 years to manufacture pistols for the U.S. Armed Forces. That facility includes security provisions still in place that were suitable for protecting military weaponry from theft. If Beretta U.S.A.'s security system is adequate for the U.S. military it should be good enough for the State of Maryland.

Notwithstanding this, SB 816 would now require Beretta U.S.A. to buy or build additional vaults or safes and to move the hundreds of firearms it has on location (for use in law enforcement armorer training, demonstration to military and law enforcement customers, marketing evaluation, etc.) each night. If Beretta U.S.A. is now forced to move all firearms into vaults to be built or safes to be bought, the company would have to evaluate the option of simply moving its operations and approximately 50 executive and other employees to another State.

This is not the only defect in SB 816. SB 816 also provides that all employees of a licensed dealer must, on an annual basis, have their background checked and fingerprints taken. Beretta U.S.A. already performs background checks when first hiring an employee but by requiring this be repeated each year for its approximately 50 employees would be costly and

pointless. Is there really a likelihood that a person's fingerprints would change from year to year? On a statewide basis, how much would this cost dealers and exactly what benefit would be derived?

That absence of relationship between the cost and onerous burden of the various provisions in SB 816 exists with respect to numerous other provisions in the Bill. For example, SB 816 contains several provisions relating to record-keeping and reporting of stolen or missing firearms that are already required by federal law. The Bill is also vague as, for example, when it states that "A licensed dealer shall report any theft of a firearm. . .*immediately* [emphasis added] upon discovering the theft" without defining what is meant by "immediately". (Within one minute? Within one hour? That day? Etc.) Federal law requires such reporting within 48 hours.

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No evidence is adduced proving why the statewide costs and burdens of SB 816 are justified by its onerous provisions. SB 816 is a perfect example of a solution in search of a problem.

For these and other reasons we recommend that SB 816 be rejected.

# **National Shooting Sports Foundation\_UNF\_SB816**

Uploaded by: SANTOS, TREVOR

Position: UNF



## NATIONAL SHOOTING SPORTS FOUNDATION, INC.

Headquarters: 11 Mile Hill Road, Newtown, CT 06470-2359

400 N. Capitol Street NW, Suite 475, Washington, D.C. 20001

202-220-1340 ext. 205    tsantos@nssf.org

### **Trevor W. Santos**

Director,

Government Relations - State Affairs

February 20, 2020

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

**SENATE BILL 816  
OPPOSE**

### **Re: Senate Bill 816 - Public Safety - Licensed Firearms Dealers (Firearms Dealers' Safety Act)**

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

On behalf of the National Shooting Sports Foundation, and our industry members located throughout the state of Maryland, I write today to express our opposition to Senate Bill 816 ("SB 816"). SB 816, dubiously titled the "Firearms Dealers' Safety Act," seeks to mandate costly, burdensome, and even some unattainable requirements of federally licensed firearms dealers ("FFLs") who possess a Maryland Regulated Firearms Dealer License ("firearms dealer"). Firearms dealers are already some of the most heavily regulated businesses in Maryland, not only having to following laws and regulations set by the General Assembly and the Maryland State Police, but also the federal Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"). Unfortunately, SB 816 seems to be a solution in search of a problem. If enacted, hundreds of law abiding, small businesses will be forced out of business because they simply will not be able to afford the costs required to comply. Thousands of Marylanders will lose their job. The state will realize a loss in state and local tax revenues.

As the trade association for America's firearms, ammunition, hunting, and recreational shooting sports industry, the National Shooting Sports Foundation ("NSSF") seeks to promote, protect, and preserve hunting and the shooting sports. NSSF has a membership of more than 10,000 manufacturers, distributors, firearms retailers, shooting ranges, and sportsmen's organizations. Our manufacturer members make the firearms used by law-abiding sportsmen, the U.S. military and law enforcement agencies throughout Maryland.

### **Electronic Record Keeping**

SB 816 would require all records be kept electronically of all receipts, sales, and other dispositions of firearms. While some firearms dealers may keep electronic records, there are still many that keep "hard copies" of all records. Any electronic record keeping software must currently be approved by the ATF. However, the ATF also allows firearms dealers to keep "hard copies" of their records. Firearms dealer keeping records in accordance with federal regulations should be enough for the state. NSSF opposes any requirement for records to be kept



electronically. Electronic recordkeeping software is expensive, and many small dealers cannot afford the cost to purchase this software and the annual service fees to keep the software updated.

### **Acquisition & Disposition (“A&D”) Records**

SB 816 would require the acquisition of any firearm be recorded one (1) business day after acquiring a firearm and would require the disposition of any firearms within seven (7) days after a sale or other disposition. ATF already has requirements for when acquisitions and dispositions must be recorded in a firearm dealer’s A&D book. However, given some firearm dealers are manufacturers, and some are importers, these requirements set forth by ATF may vary. In some cases, records must be updated in seven (7) days, others may be 14 days. NSSF believes the current ATF regulations for A&D record keeping is sufficient and would oppose these requirements in SB 816. The sponsor has offered no evidence that the current federal requirements are inadequate such that Maryland would need to have its own requirements.

### **Audio and Video of Sales, Including Retention and Availability**

SB 816 would require audio and video recording of all receipts, sales, and other disposition of firearms, as well as require the recordings be kept for a year, and made available to the Secretary, a federal agency in connection with an investigation, and to a party to a civil action after receiving a valid subpoena or discovery request.

Audio and video recording of every sale could be nearly impossible for many firearm dealers, as this would include not only traditional firearms retailers, but also “big box” stores, manufacturers, and importers. This also becomes a privacy issue. The cost for retaining these recordings for a year would be extremely expensive, amounting in the 10s of thousands of dollars. The one year associated with the retention of such recordings seems to be an arbitrary number. The cost associated with requiring both audio and video recording of every sale coupled with the requirement that the records be preserved for one year alone with shutter nearly all small retailers.

Records and recordings could already be requested by the Secretary, and federal law enforcement also has access to firearm dealer records in the course of an investigation. Additionally, a valid subpoena by a court would also require a firearm dealer to make available any records. We have great concerns with these records being required to be made available outside of what is already available by law.

### **Background Checks and Fingerprints for All Employees**

SB 816 would require background checks being conducted at the time of hire and annually on all employees of a firearms dealer. Such a requirement would be extremely costly and unnecessary. Firearms dealers already provide annually the name, address, and social security number of all employees to Maryland State Police on an annual basis for the renewal of their Maryland Regulated Firearms Dealer License. The state police would be in a position to conduct a criminal background check on the names provided to them by licensees.

Requiring a background check on all employees is unnecessary as all employees do not necessarily handle firearms. It is also already against the law for an FFL to allow someone to handle firearms who they know or have reason to believe is prohibited from possessing firearms.



This requirement also poses an issue to which a firearms dealer could be targeted for discrimination. The U.S. Equal Employment Opportunity Commission (EEOC) has in the past challenged the hiring practices of certain large retailers alleging that refusing to hire prohibited persons, i.e. felony convictions, has a disparate impact on racial minorities.

### **Insurance Liability for Acts of Another Using a Firearm Sold, etc.**

SB 816 would require licensed dealers to maintain liability insurance for the acts of another using a firearm sold, rented, or transferred by the licensed dealer in the amount of at least \$2,000,000. In no way would an insurance company write a policy to cover the criminal or even non-criminal misuse of a firearm. This would be like requiring a car dealership to maintain insurance for a vehicle they sold that is then involved in an accident caused by someone driving under the influence.

Additionally, as written, the licensed dealer would be liable for a firearm they may have lawfully sold after a background check 10 or 20 years ago which was then stolen from the original owner and misused to commit a violent crime. Again, no insurance company would provide such coverage of the misuse of a firearm, nor any other lawful product that was then misused. NSSF opposes this provision because no insurance company would write such a policy. This provision simply is impossible to comply with and would force every retailer in the state to close their doors.

### **Reporting Theft of Firearms**

SB 816 requires a firearm dealer to report any theft of a firearm immediately to law enforcement. While NSSF does not have a problem with the basis of this requirement, the language is not very specific. FFLs are already required by law to report lost or stolen firearms within 48 hours to both federal and local law enforcement. This is just another provision of this bill that is already addressed by federal law and regulation.

### **Display and Storage of Firearms During Business and Non-Business Hours**

SB 816 would require firearms dealers to store firearms in a locking display case or other area inaccessible to customers during business hours, and in a vault, safe, or reinforced display case with shatterproof glass outside of business hours. SB 816 also requires firearms displayed should be rendered inoperable with a trigger lock or other mechanism.

**Business Hours** – Most retailers store handguns in a glass display case, similar to what a jewelry store does, so customers are able to see the handguns and view them through the glass. However, long guns (rifles and shotguns) can be stored on open racks not only behind the counter, but also on racks throughout a retail store. It varies from retailer to retailer, and all depends on the amount of space available in a retail establishment. There are no problems associated with how firearms are currently being displayed at retail establishments. Additionally, there is no need to “render a firearm inoperable” while being displayed to a customer. Like with other consumer products, gun owners want to look at, feel and hold a firearm before making a purchase and to compare it to other models. This requirement makes it impossible for consumers to evaluate the product and discourages sales.

**Outside Business Hours** – Requiring firearms to be locked in a vault, safe, or in a reinforced display case with shatterproof glass is nearly impossible. Some retailers have 50, 100, 200, and

even up to 1,000 firearms in their inventory. The same goes for manufacturers (see the letter from Beretta USA) who could have several thousand firearms in their inventory. A small “mom and pop” retail store would likely not have room for vaults or safes to store their firearms, and those firearms dealers with hundreds of firearms would not be able to find a safe or vault big enough to store their firearms. Additionally, the time associated with storing firearms at night, and bringing them out for display before opening could take hours and hours, while at the same time increasing the chances of damaging a firearm. The display and storage requirements set forth in SB 816 are unworkable, just as many, if not all, other portions of the bill.

Senate Bill 816 would cause many lawful firearms dealers to go out of business simply because they are unable to comply with the requirements of the legislation. This legislation remains to be a solution in search of a problem, but the solution will now create many problems for firearms dealers. Firearms dealers take important steps to ensure their firearms (which is an investment for them) are protected from theft, unauthorized access, and their business is secure. NSSF, as the trade association for the firearms industry, recently embarked on a new initiative in conjunction with ATF, Operation Secure Store. Operation Secure Store (OSS) is a multifaceted initiative providing Federal Firearms Licensees (FFLs) with education on solutions and services that enhance operational security and aid in identifying potential risks, protecting interests and limiting the disruption of operations.

In the year following the Operation Secure Store launch in 2018, burglaries and the number of firearms of stolen from FFLs fell by nearly 25%. This program is working and NSSF, in conjunction with ATF, is glad to lead.

It is for these reasons stated above that the National Shooting Sports Foundation opposes Senate Bill 816 and we would respectfully urge you to vote “NO” should this bill come up for a vote.

Sincerely,

A handwritten signature in black ink, appearing to read 'Trevor W. Santos', written in a cursive style.

Trevor W. Santos

**Atlantic Guns\_UNF\_SB816**

Uploaded by: SCHNEIDER, STEVE

Position: UNF

944 Bonifant Street  
Silver Spring, MD 20910  
301 505 4448



601 Hungerford Drive  
Rockville, MD 20850  
301 279 7983

[www.atlanticguns.com](http://www.atlanticguns.com)

Senate Bill 816- Public Safety- Licensed Firearms Dealers' Safety Act)- **OPPOSE**

My name is Steve Schneider and I am the owner of Atlantic Guns, Inc. We are a family business with two locations in Montgomery County and are proud to have served the community for 70 years.

I strongly oppose SB 816 for the following reasons:

Section 5-145 duplicates many existing ATF regulations with the exception of the electronic format requirement. We spend many, many payroll hours on the endless detailed recordkeeping and reporting we must do as licensed firearms dealers. Few businesses face the regulations and scrutiny that we do. ATF regulations require us to keep paper records of all firearm transactions unless a special variance is approved. This bill would require us to keep two sets of records, with more payroll expense and would require me to invest a lot of money in a system that duplicates what we are doing already.

This section also requires video and audio recordings of receipts, sales and dispositions. We use video surveillance cameras for security reasons, but that is far different than recording interactions between customers and employees. This is an unacceptable invasion of privacy and it is unjust for my employees and customers to face this kind of intrusion. It may be appropriate to do this in jails and prisons, but law-abiding citizens should never be subjected to this. Personal conversations between employees and customers would be nearly impossible. Furthermore, I have no idea how I could afford and maintain a system to do this or how I could store the recordings for a year.

Regarding employee criminal history reports, Section 5-147 requires annual fingerprinting and background checks for every employee. It is against the law for prohibited persons to have access to firearms and work in a gun store. Although we currently do criminal background checks when we hire new employees, the requirement of repeating this process annually and adding the additional expense of fingerprinting would be a costly and unnecessary obligation. When we apply for the annual renewal of our State firearms license, we provide a list of employees to the Maryland State Police who could do background checks if deemed necessary.

Section 5-150 requires us to store every firearm in a locking display case or other inaccessible area during business hours. Atlantic Guns, and every dealer I know, display handguns in locked cases. Long guns being much larger and requiring more space are another matter. Between our two locations we currently have more than

1,200 rifles and shotguns in our inventory. We do not have the floor space nor can we afford locking cases large enough to display or store this inventory in the way this Bill requires. It would also require a trigger lock or other device on every firearm we display. I am not sure how safety will be improved by this because dealers already keep the firearms they are selling unloaded at all times. For a dealer with a large inventory this would be a costly and cumbersome requirement with questionable benefits.

The Bill also imposes specific after-hours storage requirements. Atlantic Guns lacks the space for a vault or safes for nighttime storage. If we did have sufficient space it would be physically impossible for us to move our large inventory twice every day. We utilize comprehensive electronic security systems with alarms and 24/7 monitoring. We have installed steel bars, metal grates, bollards and exterior lighting as allowed at each location. We make every effort to secure both of our locations and our inventory. We also communicate with local law enforcement any time a specific concern occurs.

As a dealer and member of the community, I am deeply concerned that the firearms in my inventory are secured. The requirements of this bill are unaffordable, unmanageable, and impractical.

I strongly oppose SB 816. If enacted, it will have a devastating impact on our ability to remain in business. I will be happy to meet with you at your convenience to answer questions or discuss this further.

Thank you for your consideration.

Steve Schneider  
President  
Atlantic Guns, Inc.

# **Shawn Shupp\_unf\_sb816**

Uploaded by: Shopp, Shawn

Position: UNF

To our representatives concerning HB636/SB646, HB910/SB958, HB1257/SB816, HB958/SB910, HB591, HB1078, HB1501, HB1261.

You are our elected representatives and thus are duty bound to represent the wishes of your constituents.

We the people are **strongly opposed to ANY** additional regulations on law-abiding gun owners in MD. These laws will do nothing to prevent crime and will only further infringe on the rights of the good people that you are supposed to represent.

Not only will these ridiculous laws be completely ineffective against crime, but they will serve only to turn good law-abiding working tax payers into instant criminals.

Instead of making more laws like these we would all be better served if you actually made harsher penalties for the criminals who will always ignore such laws.

Shawn Shupp

[sps308@Reagan.com](mailto:sps308@Reagan.com)

12313 Forrest Hill Rd

Clear Spring MD 21722

**Richard W. Smith \_UNF\_SB816**

Uploaded by: Smith, Richard

Position: UNF



I am a lifelong Maryland resident. My information is as follows:

Name: Richard W. Smith

Address: 1504 Miller Rd, Westminster, MD 21158

Email Address: [rsmith7@comcast.net](mailto:rsmith7@comcast.net)

I am writing you to express my opposition to a number of Gun-related Bills being presently proposed by the Maryland Legislature. These Bills will directly impact me personally as a Maryland Business Owner, Home Inspector, Head of Household/Father, Sportsman and Hunter, and as an American and Maryland citizen. Each of these Bills is an attack on my 2nd Amendment Constitutional Right to Keep and Bear Arms that SHALL NOT BE INFRINGED. As representatives of the citizens of Maryland who have sworn an oath to protect the United States Constitution and the Maryland Constitution, you and all of the Delegates and Senators have a DUTY to defend the 2nd Amendment of the United States Constitution as required in the Maryland Constitution Article 2 that states that the Constitution of the United States "shall be the Supreme Law of the State". The Bills being proposed are in direct violation of Article 2 because each one of them is an infringement upon the citizens of Maryland as US citizens.

### **I OPPOSE the following: HB636/SB646 Public Safety - Access to Firearms - Storage Requirements**

These Bills are ambiguous in their wording. I agree with safe handling and storage of firearms at all times and I personally practice this every day. However, the language in this Bill regarding "could gain access" can be literally an unlimited number of scenarios including situations where a minor purposely breaks into locked storage units. The majority of law-abiding gun owners already practice strict gun safety and storage and this law will only put us in jeopardy of breaking the law due to ambiguous and poorly written language. This will make criminals out of law-abiding citizens.

**HB910/SB958 Criminal Law - Untraceable Firearms** These Bills will also instantly make thousands of citizens instant criminals. Citizens who have abided by Federal Law and ATF rules will suddenly become outlaws. The United States has allowed law-abiding citizens the ability to manufacture/complete firearms for personal use as part of the 2nd Amendment Right to keep and bear arms, unincriminated. These Bills will be in conflict with Maryland Constitution Article 2 that states that Constitution of the United States "shall be the Supreme Law of the State".

### **HB1257/SB816 Public Safety - Licensed Firearms Dealers (Firearms Dealers' Safety Act)**

These Bills will make it yet again much more difficult for me and others as law-abiding citizens of Maryland to lawfully obtain firearms. Not only will it cause some firearm dealers to potentially go out of business due to the high costs of this unnecessary burden, for those dealers that stay in business, it will translate into an unfair burden to those of us who lawfully purchase firearms as the price of the firearms we purchase in Maryland will undoubtedly increase due to this ridiculous requirement. Background checks both at the Federal and State levels and State-imposed "waiting periods" are already in place to prevent firearms from lawfully getting into the hands of criminals (as if criminals would even buy firearms through legal channels to begin with!). Enforce the laws already in place instead of creating new ones that make it harder for law-abiding citizens such as myself to exercise our Constitutional Rights. Criminals obtain firearms through illegal channels - so enforce the laws already in place and shut down those illegal channels!!

### **HB1078 Public Safety - Education - Firearm Funding (No Funding for Firearms Act)**

As a man married to a public school teacher and father to children who are in the public school systems of Maryland, I am deeply offended that MY Government would propose Legislation to make it ILLEGAL for teachers to (voluntarily) receive training by their employers that could potentially save her/his life and the lives of students and others at our public education institutions. I have stated this already: Criminals do not abide by the Law! Criminals will continue to knowingly target "gun free" areas such as schools, etc. because they know that they immediately hold the advantage and will meet minimal, if any, opposition or resistance to their evil plans. Instead of this ridiculous legislation, how about you do the opposite and not only allow public funding of

training for teachers but let our teachers (those who wish to do so) protect lives and train them properly in the safe use of firearms and level the playing field against criminals! Most criminals are cowards and they will likely not target places where they know good citizens are armed, trained, and ready to defend against them. Stop trying to pass legislation that makes it easier and easier for the criminals to target the law-abiding. You think that you are solving the problem when in reality, you are stacking the odds in favor of the criminal instead! Is that what you really want to accomplish? Think about that.

**HB591/HB1501 Public Safety – Lost or Stolen Regulated Firearm – Reporting** There are already laws in place requiring us to report lost or stolen firearms. Lawfully, regulated firearms can only be approved for purchase by law-abiding citizens. Once again, this is an example of legislation that penalizes the law-abiding instead of the criminals.

**HB1104 Public Safety - Regulated Firearms - Transfer** There are already laws in place requiring us to follow specific procedures when transferring ownership of regulated firearms. Once again, lawfully, regulated firearms can only be approved for purchase by law-abiding citizens. Therefore, this another example of legislation that penalizes the law-abiding instead of the criminals by making it increasingly more difficult for LAW-ABIDING citizens to be able buy/sell firearms.

**HB1261 Assault weapon copycat definition changes and registration** This Bill is an absolute atrocity. Not only will it keep myself and my family from being able to lawfully purchase and own sporting rifles of specific types and kinds in the future, this Bill also intends to unfairly tax me and my family with ridiculous fees for "registration". We have purchased EVERY SINGLE FIREARM 100% LEGALLY and we have submitted the proper paperwork to both the Federal and State Governments as required, yet the State of Maryland says that is not sufficient??? This Bill is another direct attack on the law-abiding citizens and is quite blatantly another attempt to disarm the public and to offensively trample on our GUARANTEED 2nd Amendment US Constitutional Right to keep and bear arms that SHALL NOT BE INFRINGED. Once again I remind each one of our PUBLICLY ELECTED representatives of your oath to uphold both the United States and the Maryland Constitutions. Furthermore, I remind you all again that this Bill will be in conflict with Maryland Constitution Article 2 that states that Constitution of the United States "shall be the Supreme Law of the State". If passed, this Bill will also instantly turn thousands of law-abiding gun owners in the State of Maryland into instant criminals. The United States Constitution specifically prohibits **ex post facto laws**.

As a lifelong resident of Maryland I have watched with great shame and utter disappointment at our Legislature's ugly track record with previous gun "control" legislation and I continue to be disgusted that our elected officials ignore the GUARANTEED RIGHTS of Marylanders as UNITED STATES CITIZENS. Maryland residents are already one of the most infringed group of United States citizens when it comes to Gun Rights. You claim you are making Maryland safer, yet you have absolutely no proof that we are any safer. In fact the exact opposite is true! Baltimore is one of the highest crime centers in the entire country!!! You are bound by oath and you have a public duty to serve us and defend the Constitutions of Maryland and the USA. These ever-important documents are what make us FREE men and women, and these proposed Bills will directly erode that Liberty. The Bill of Rights is not the "Bill of Wants" or the "Bill of Needs" - it is a guarantee of the essential Rights that we have as citizens of this Country. EVERY SINGLE ONE OF THESE RIGHTS is just as important as the others. Just as you would not consider legislation that would erode the Freedom of Speech, or the Freedom of Religion, or the Freedom of Assembly, or the Freedom of the Press, you should NOT consider legislation that will erode the Right to Bear Arms!

I am praying for all of you daily that you make sound decisions that are congruent with the Constitutions that you SWORE TO UPHOLD. May God be with you and guide you.

Sincerely,

Richard W. Smith

## **Garrett Stefan\_unf\_sb816**

Uploaded by: Stefan, Garret

Position: UNF

**RE: OPPOSE all new gun control bills and HB 1261**

Dear elected official and staff:

I stand with the Firearms Policy Coalition and other pro-rights groups in OPPOSITION to HB 1261 and the dozens of other gun control bills introduced this session.

These new proposals will only crack down on those wishing to defend themselves with commonly owned guns--it will not make a difference to the criminal element. MD already has some of the strongest gun control laws in the nation.

These new proposed measures are untenable, especially because we all know criminals are not going to follow them at all. We know this because after the last big gun control laws in Maryland passed it had no significant impact on gun crime; in fact it, increased and hasn't come down.

It's time representatives in Annapolis finally stand up and defend the entire Bill of Rights and stop catering to anti-rights extremists like Michael Bloomberg.

Please make a stand and OPPOSE HB 1261, as well as the dozens of other proposed gun control bills.

Thank you.

Sincerely,  
Garrett Stefan  
[garrettstefan@gmail.com](mailto:garrettstefan@gmail.com)

2818 Harford Rd.  
Fallston, MD 21047  
Constituent

# **Steven Steinbacher\_unf\_sb816**

Uploaded by: Steinbacher, Steven

Position: UNF

Hello Delegate Arian,

My name is Steven Steinbacher.

My address is 1900 Huntfield Ct, Fallston, MD 21047

I have written to you and your colleagues before and will continue to do so.

I am **STRONGLY OPPOSED** to all gun related bills being pushed by the Maryland General Assembly.

I OPPOSE:

HB636/SB646

SB816/HB1257

HB910/SB958

HB1078

HB958/SB910

HB591

HB1104

HB1501

HB1261

All of these are restrictions on my natural rights. As a tax paying, law-abiding citizen, I have had enough of the political class and their attacks on my rights and the rights/freedoms of my friends and family.

The gun bans initiated in 2013 have done nothing for Marylanders to make them safer, but they have made it harder for law-abiding citizens to protect themselves, their families, and their property. The general assembly should focus on the laws already on the books and the crime in Baltimore city that will not be affected by any of these bills. Criminal prosecution reform should be on the docket, not my right to peacefully own property.

Sincerely,

Steven Steinbacher

# **WilliamUphoff\_unf\_SB816**

Uploaded by: Uphoff, William

Position: UNF

**OPPOSED to:**  
**HB636(sb646)**  
**hb910(sb958)**  
**hb1257(sb816)**  
**hb958(sb910)**  
**HB591**  
**HB1104**  
**hb1261**  
**sb646(hb636)**  
**sb816(hb1257)**  
**hb1078 hb1501**

William Uphoff  
823 Judy lane Pikesville  
[cubhillconst@aol.com](mailto:cubhillconst@aol.com)

Do any of these bills take the words a GOOD AND SUBSTANTIAL REASON out of the ccw for Maryland? probably not so instead of going after the real problem CRIMINALS you are making it harder and more expensive for law-abiding citizen to own a fire arm for protection against the people that don't follow the law anyway so these bills HB636(sb646) hb910(sb958)hb1257(sb816)hb958(sb910)HB591 HB1104 hb1261 sb646(hb636)sb816(hb1257)hb1078 hb1501 are not a good idea in my opinion . These bills do not allow myself and any law-abiding citizen to have in my home and be able to carry for self-protection and to be able to protect my family



**NRA\_UNF\_SB 816**

Uploaded by: WEBER, DAVID

Position: UNF



**NRA**

February 20, 2020

Senate Bill 816: Opposed

Dear, Chairman Smith & Members of the Committee,

Senate Bill 816 would create severe additional burdens on Maryland's licensed firearms dealers. Such legislation would make it impracticable for many licensed dealers to continue to operate, thus depriving Maryland gun owners of their much-needed services. Those dealers that remain would be forced to pass on the severe compliance costs onto Maryland gun owners, raising the cost of exercising Second Amendment rights.

These new burdens on licensees would require them to maintain electronic records of all receipts and sales of firearms, require them to create a video and audio record of all receipt and sale of firearms and to maintain that record for one year, and require that a licensed dealer create an anti-theft operating procedure that includes: locks, exterior lighting, surveillance cameras, and alarm systems, all of which only gets passed on the consumer.

On top of all these expensive mandated costs, the Maryland FFI would be burdened with additional regulations and costs. The licensed dealers would be required to now run a background check for new employees and annually for existing employees. Private employee information, including fingerprints, would be required to be submitted to the Department of Public Safety and Correction Services "Central Repository" (registration of gun store employees). Now many individuals are in great threat of their personal information being made public, and even possible stolen.

SB 186 will also require that a licensed dealer obtain at least \$2,000,000 in liability insurance. Placing great financial burdens on the small mom and pop stores and in turn putting many of these small business owners out of business. Then, during operating business hours, all firearms are to be stored in an area inaccessible to customers and rendered inoperable. SB 186 would mandate that outside business hours, all firearms should be stored in a vault, safe, or "reinforced display case with shatterproof glass." Also, all of the costs to be compliant will guarantee many small business owners to turn the lights off for good.

This legislation is unnecessary. The Bureau of Alcohol, Tobacco, Firearms and Explosives already imposes significant regulatory requirements on licensed firearms

dealers (FFLs). FFLs are required to maintain form 4473 firearm transfer records for at least 20 years. And if they go out of business, FFLs are required to send such records to the ATF to facilitate firearm traces.

This legislation is an attempt to make it as difficult as possible to be a licensed firearms dealer in Maryland, and in turn, make it as difficult as possible to lawfully obtain a firearm. The National Rifle Association of America opposes Senate Bill 816.

Sincerely,

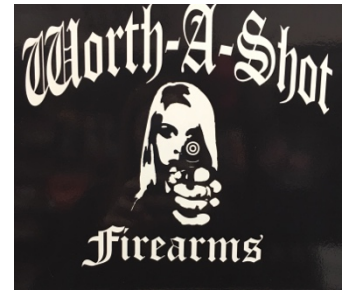
A handwritten signature in blue ink, appearing to read "D. Weber". The signature is stylized and cursive.

David Weber  
Maryland State Director  
NRA-ILA

**donna worthy\_unf\_Sb816**

Uploaded by: worthy, donna

Position: UNF



02/20/2020

# SENATE BILL 816

WORTH-A-SHOT, INC.  
8424 VETERANS HWY STE 11  
MILLERSVILLE, MD 21108

My name is Donna Worthy. I am the owner of Worth-A-Shot, Inc. in Millersville MD. I am retired from the Baltimore City Police Department with a line of duty injury. I am also on the board of the MLFDA (Maryland Licensed Firearms Dealers Assoc.).

I strongly oppose Senate Bill 816 for the following reasons:

## Section 5-145

This section requires dealers to create video and audio recordings of all receipts, sales, and other dispositions of firearms conducted at business. This type of requirement is nearly impossible to comply with. Even with multiple cameras installed in every room of the business, it is nearly impossible to capture all conversations clearly, and to capture receipts in a video would be nearly impossible. This is also an issue of invasion of privacy for both store personnel, as well as customers. To have camera surveillance for security and safety is one thing, but to require audio recordings of every transaction to take place in the establishment is clearly an invasion of privacy. I have touched base with many security companies inquiring about a system that would be able to meet this requirement. The companies quoted an astronomical quote but advised that the system would still not be able to capture all receipts and paperwork and without added microphones, may not capture conversations clearly either. This cost would not be possible for many small dealers and would even be a great hardship on larger dealers as well.

## Section 5-147

This section discusses anyone working at a firearms dealer must get fingerprint and background checks yearly. Dealers currently cannot let anyone prohibited from possessing firearms have access to any firearms in the store. Most stores already run a background check before hiring anyone that will deal with firearms. However, if the employee has absolutely no involvement in firearms, or firearms sales but work in the establishment for a different job, they are held to the same standard. The average cost to fingerprint each employee would be roughly \$50 per person. This is an extra added yearly expense on the owners, and depending on the number of workers, can be quite costly.

## Section 5-150

This section requires dealers to store every firearm in a locking display case or inaccessible area during store hours. Most stores keep all handguns in locking cases even during store hours. The long guns however, are kept behind the counter out of customer reach unless assisted by an employee. This section also requires a trigger lock be installed on every firearm. A locking case, and a trigger lock seems very unnecessary. All firearms displayed are always unloaded. As a former law enforcement officer, I have never recovered a firearm used in a crime from a firearm that was stolen during store hours from a gun store.

## Section 5-148

This section requires the dealer to maintain liability insurance for the acts of another using a firearm sold, rented, or transferred by the licensed dealer in the amount of \$2,000,000.

I personally spoke with my insurance company. They advised me that a policy that would cover this does not exist. If a gun store legally sells a firearm to a customer, and a background check was conducted and approved for that customer, how is the store now responsible if later down the road, even 20 years later, a crime is committed with that firearm. This type of policy does not exist, thus would be an impossible standard to meet. In my gun store as well as every other

store I know, we always err on the side of caution. Even if a background check comes back as a proceed, if something seems off, we cancel the transaction.

At Worth-A-Shot Firearms, we take every possible precaution to keep firearms out of prohibited persons possession. We have bars on all windows, security and camera system, and have regular communications with local law enforcement. As a former Baltimore City Police Officer, I understand the importance of keeping firearms out of criminals' hands.

Gun stores are not the issue with gun violence.

Gun stores are under strict guidelines with both the state and the ATF.

I am ready and willing to answer any and all questions. Feel free to call me or email me anytime.

THANK YOU,



DONNA WORTHY  
PRESIDENT  
WORTH-A-SHOT  
443-506-7359  
DONNAWORTHY@COMCAST.NET