



**Testimony in Support of the  
Handguns - Handgun Roster and Sales, Rental, or Transfers  
Senate Bill 830 / House Bill 1339**

*Karen Herren, Executive Director*  
Marylanders to Prevent Gun Violence

February 25, 2026

Marylanders to Prevent Gun Violence (MPGV) is a statewide organization dedicated to reducing gun deaths and injuries through evidence-based policy, public education, and survivor-centered prevention strategies. We strongly support SB 830 / HB 1339, *Handguns – Handgun Roster and Sales, Rentals, or Transfers*.

### **Background**

In 1988, the General Assembly established the Handgun Roster Board in response to growing concern over the proliferation of cheaply made, easily concealable handguns often referred to as “Saturday Night Specials” - firearms associated at the time with poor manufacturing quality and disproportionate involvement in crime. The Board was created to serve as a consumer protection and public safety safeguard, ensuring that handguns sold in Maryland met minimum standards for safety, reliability, and legal compliance before entering the commercial market<sup>1</sup>.

Over the past 38 years, the firearm marketplace has changed dramatically. The rise of high-capacity semi-automatic handguns, polymer and modular designs, unserialized “ghost guns,” and rapid-fire modifications reflects a modern industry that looks very different from the one contemplated in 1988. At the same time, patterns of gun violence have evolved, including sustained levels of firearm suicide, intimate partner homicide, and increasingly lethal shootings. These shifts underscore the need to ensure that Maryland’s safety review process reflects the realities of today’s firearms market.

### **The Scope of Maryland’s Handgun Roster**

Under Maryland law<sup>2</sup>, a licensed dealer may not sell a handgun unless it has been reviewed and placed on the Handgun Roster. The roster does not apply to all firearms. It applies only to firearms that meet the statutory definition of a “handgun.”

That limitation is intentional - and important.

---

<sup>1</sup> Legislative History of HB1131, 1988 Maryland General Assembly (Thurgood Marshall State Law Library), <https://mdlaw.ptfs.com/aw-server/rest/product/purl/TMSLL/s/ca95b64b-fada-41d7-8385-d6e2d68829e9>

<sup>2</sup> Public Safety, [§ 5-406](#)



The General Assembly created a review process for handguns, not for all firearms. The integrity of that system depends on accurate and consistent application of the governing statutory definition.

The roster serves two interrelated purposes:

### **1. Consumer Protection and Safety**

The roster provides a structured, prospective review process to ensure that handguns offered for sale in Maryland meet required standards before entering the marketplace.

In most high-risk consumer industries, products must satisfy mandatory federal safety standards before they are sold. For example, motor vehicles are regulated by the National Highway Traffic Safety Administration, which sets crashworthiness standards, requires testing, mandates safety features, and can order recalls. Children's products are regulated by the U.S. Consumer Product Safety Commission, which establishes safety standards, requires testing and certification, and has recall authority when products pose hazards.

Firearms are different. There is no federal agency that conducts pre-market design review or performance testing to determine whether a handgun is safe for consumer sale. In that respect, firearms are an outlier among inherently lethal consumer products.

Maryland's Handgun Roster is one of the few mechanisms in the country that functions as a front-end consumer protection checkpoint. However, its structure and testing framework were designed for a 1988 marketplace, not today's firearm industry.

### **2. Statutory Compliance Checkpoint**

The roster also functions as the mechanism through which Maryland operationalizes its statutory requirements governing handguns.

It is not intended to expand the law, nor to narrow it. It is intended to apply the law as written.

When functioning properly, the roster ensures that only firearms that meet the statutory definition of a handgun, and comply with applicable Maryland law, are approved for sale.

Because the roster applies only to handguns, clarity and fidelity to the statutory definition are foundational. When firearms that do not clearly meet that definition are evaluated or approved under the roster process, the system moves beyond its statutory boundaries.

That departure creates:

- Legal ambiguity
- Inconsistent application
- Vulnerability to challenge
- Erosion of legislative intent



Importantly, this bill does not expand the roster to cover all firearms. While some may argue that a broader system would provide additional clarity, that is not the proposal before you.

This legislation is focused on restoring clarity within the existing statutory framework, ensuring that the roster applies to handguns as defined by law, and that legal determinations are made in a structured and defensible manner.

### **Inconsistent Application of the Statutory Definition**

Because the Handgun Roster applies only to firearms that meet the statutory definition of a “handgun,” accurate application of that definition is foundational to the integrity of the process.

Maryland law contains at least three separate definitions of “handgun,” including those found in Criminal Law § 4-201, Public Safety § 5-101(n), and Public Safety § 5-401. For purposes of Handgun Roster review, only the definition in § 5-401 governs.

In recent years, however, firearms have been evaluated using broader definitions found elsewhere in the Code. During Board deliberations and in materials presented by the Maryland State Police (see Attachment A), definitions from § 4-201 and § 5-101 have been cited to explain why certain firearms are brought before the Board.

When a regulatory process depends on precise statutory boundaries, substituting or blending definitions creates risk. Even small definitional differences can materially alter which firearms qualify for review and approval.

As a result, firearms have been evaluated, and in some instances approved, under frameworks that do not clearly correspond to the legislature’s intended scope for the roster.

### **Why This Matters**

This is not a minor technical issue.

The roster is limited to handguns as defined by statute. If firearms that do not clearly meet that definition are evaluated within the roster framework, the system extends beyond its statutory design.

That extension is not the result of legislative action; it is the result of structural ambiguity in how legal determinations are made.

When statutory definitions are applied inconsistently:

- The scope of the roster becomes unclear
- Outcomes may vary depending on which definition is used
- The process becomes vulnerable to legal challenge
- Legislative intent is diluted

A consumer protection and statutory compliance checkpoint must rest on clear definitional guardrails. Without them, predictability and consistency are compromised.

Many Marylanders are surprised to see firearms that resemble those restricted under Maryland's Assault Weapons Ban (Md. Code Ann., Crim. Law §§ 4-301–4-306) not only available for sale, but listed on the Handgun Roster after Board approval<sup>3</sup>. That disconnect further underscores the importance of ensuring the roster operates strictly within its statutory boundaries.



*Example: The Maxim Defense MD9 Pistol (overall length 17.25 to 22.5 inches) was approved by the Board in April 2024. Marylanders to Prevent Gun Violence filed an objection to that decision, prompting further review and deliberation; the Board ultimately reaffirmed its approval and permitted the firearm to be sold in Maryland.*

## **Structural Cause**

The underlying issue is structural.

The Handgun Roster statute contains a specific definition of “handgun” that governs roster review, and that definition is not inherently unclear. However, the Board is not structured as a legal adjudicatory body. Most members are not lawyers, and while some members bring legal training, no member has authority to issue binding legal determinations on behalf of the Board.

As a result, the Board has at times been required to navigate competing statutory definitions in real time, without a formalized legal determination process. Deliberations can therefore reflect differing views about which statutory framework applies, even when § 5-401 provides the controlling definition.

That is not an optimal structural design for a regulatory checkpoint system that depends on precise statutory compliance.

---

<sup>3</sup> Kate Cimini, *Handgun or Rifle? Maryland Rambo-style ‘Handguns’ Ignite Gun Safety Battle*, *Balt. Sun* (Sept. 9, 2025), [<https://www.baltimoresun.com/2025/09/09/handgun-rifle-short-barreled/?share=aorbagrslw2cwuwgicn>]



## How the Bill Addresses This

The bill corrects this structural weakness by separating legal analysis from the Board's role and assigning it to the Office of the Attorney General.

Under the proposed framework, the Attorney General will review each petition to determine whether the firearm complies with all applicable Maryland and federal law, including whether it meets the controlling statutory definition, before it may be considered for placement on the Handgun Roster.

By placing statutory interpretation with the State's chief legal office, the bill promotes consistent application of the governing definition and strengthens the integrity of the roster process. It also clarifies the Board's role going forward: rather than serving as the primary forum for legal determinations, the Board will serve an oversight and transparency function, while also promoting public understanding of the roster process and its implementation..

## Product Safety Testing

The current statute permits testing but does not require it. There are no defined statutory or regulatory testing parameters governing how petitioned firearms must be evaluated before placement on the Handgun Roster.

In practice, the Maryland State Police conduct a limited review at the request of the Board. That review typically includes documentation of the firearm's make and model, manufacturer information, materials description, confirmation of manufacture after 1985, identification of any safety mechanism and whether it is functional, caliber, weight, overall length, barrel length, magnetic detectability, and whether the firearm functions during a brief test fire. Space is provided for additional comments.

A review of recent petitions indicates that when conducted, test firing generally consists of between six and nine shots taken (*i.e.*, rounds discharged). Many petitioned firearms are not test fired at all because they are submitted as model variations.

As firearm design has evolved, particularly with the rise of modular platforms, differences between models built on the same base system can be substantial. Limited or waived testing does not consistently account for those variations.

By comparison, California, one of the only other states that maintains a firearm roster, requires substantially more defined testing protocols. For example, semiautomatic pistols must complete a 600-round firing requirement, along with additional safety testing and defined malfunction thresholds. See [Cal. Penal Code § 31905](#); [Cal. Code Regs. tit. 11, § 4060](#).

The key distinction is not simply the number of rounds fired, but the existence of clear, objective, written pass/fail standards.



## **How the Bill Addresses This**

The bill establishes defined testing requirements and moves Maryland toward a true product safety evaluation framework, complete with articulated pass/fail parameters.

It provides clearer standards for endurance and safety testing and formalizes the expectation that firearms be meaningfully evaluated before placement on the Roster. Recognizing that expanded ballistic or mechanical testing may exceed current Maryland State Police capacity, the bill also authorizes the use of qualified independent laboratories to conduct testing.

Other states utilize certified third-party laboratories for this purpose. California, for example, contracts with independent testing entities to perform required evaluations on behalf of its Department of Justice.

By clarifying testing expectations and permitting appropriate outsourcing, the bill strengthens the credibility, defensibility, and consistency of Maryland's roster process.

## **Absence of a Mechanism to Reconsider Placement**

Current law provides no formal mechanism to reevaluate or remove a firearm from the Handgun Roster if new safety information comes to light after approval. Nor does it provide a structured process to reassess listed firearms if legal standards evolve.

Once a firearm is placed on the Roster, it generally remains there absent voluntary withdrawal by the manufacturer.

Recent media reporting has highlighted ongoing litigation involving certain models of the SIG Sauer P320 platform, including allegations that some firearms discharged without a trigger pull<sup>4</sup>. Regardless of the ultimate resolution of those claims, the situation illustrates a structural gap: there is no clear statutory pathway to reopen review based on emerging safety concerns.

Multiple versions of that platform remain listed on the Handgun Roster. In addition, newer model variations have been petitioned and approved as "model changes," in some instances without additional firing evaluation.

A modern consumer protection checkpoint should include a mechanism to reassess previously approved products when credible new evidence emerges.

## **How the Bill Addresses This**

---

<sup>4</sup> Kate Cimini, *Maryland Handgun Board Approves Sale of Sig Sauer That Some Claim Fires on Its Own*, Balt. Sun (Sept. 2, 2025), [<https://www.baltimoresun.com/2025/09/02/maryland-handgun-board-approves-sale-of-sig-sauer-some-claim-fires-on-its-own/?share=eroulhw9pevsaydd0rae>].



The bill establishes a formal process through which the Attorney General may reopen and reevaluate a firearm's placement on the Roster when credible new evidence indicates that the firearm may present a safety or functionality risk not identified during the initial review.

Under this framework:

- The firearm may be retested.
- Additional information may be required from the manufacturer.
- The firearm may be removed from the Roster if warranted.

This creates a structured, legally defensible mechanism for reassessment, aligning the Roster with standard regulatory practice in other consumer product contexts, where post-market review and corrective action are recognized components of responsible oversight.

### **The Board's New Role**

By placing legal review with the Office of the Attorney General and establishing defined testing parameters, the bill clarifies and refocuses the role of the Handgun Roster Board.

Rather than serving as the primary venue for statutory interpretation or ad hoc testing determinations, the Board's function shifts to one of procedural oversight and public accountability.

Under the proposed framework, the Board will:

- Provide oversight of the roster process, including the implementation of legal review by the Attorney General and testing conducted by the Maryland State Police or qualified laboratories;
- Work collaboratively with the Attorney General and the Maryland State Police to establish interim procedures necessary to implement the revised system;
- Promote transparency and public understanding of how the roster process operates; and
- Offer recommendations or advisory input where appropriate to ensure the system functions as intended.

This shift preserves the Board's citizen-based structure while aligning its responsibilities with governance, transparency, and accountability, rather than statutory interpretation.

The result is a clearer separation of roles: legal determinations by the State's chief legal office, defined technical testing by appropriate experts, and structured oversight by a public board.

### **Conclusion**

Maryland made a deliberate choice to regulate the sale of handguns through a structured roster system.



That system was designed to protect consumers, ensure compliance with statutory requirements, and provide a consistent administrative checkpoint before firearms enter the marketplace.

Over time, however, structural gaps have placed strain on that framework. Ambiguity around statutory definitions, the absence of defined testing parameters, unclear sequencing of legal and technical review, and the lack of a mechanism to reconsider prior approvals have collectively weakened the clarity and defensibility of the process.

Senate Bill 830/House Bill 1339 does not expand the roster. It does not alter Maryland's underlying firearm prohibitions. It strengthens the structure that already exists.

By assigning legal interpretation to the State's chief legal office, establishing clear testing standards, creating a pathway for reassessment when new information emerges, and clarifying procedural roles, the bill restores coherence and integrity to the roster system.

A regulatory checkpoint that is predictable, transparent, and grounded in statute benefits everyone, including lawful firearm owners, dealers, regulators, and the broader public.

For these reasons, Marylanders to Prevent Gun Violence respectfully urges a favorable report.

---

*Attachment follows.*

## Attachment A

TABLED AT 12/03/2025 HRB MEETING

"The Board requests from the Licensing Division an explanation that this firearm meets the definition of a handgun in Maryland and clarification it has standing in front of the Board."

**Petition Number:** 25306

**Manufacturer:** Pro2A Tactical

**Model:** Pro-15 Pistol

**Additional Information:**

Per Corporal Rasinski, Licensing Division, Firearms Registration Unit, "Please see the attachment it has the information regarding the firearms and our interpretation of the law regarding them." [Last page of each petition file and all reviews provided as separate resource]

Please see attached FATMU's original Target and Worksheet for reference.

Office Use Only	
Manufacturer:	Pro2A Tactical
Importer:	N/A
Model:	Pro-15 Pistol
Caliber(s):	5.56 NATO

Pick up

**Petition Number:** 25306

**Manufacturer:** Pro2A Tactical

**Model:** Pro-15 Pistol

**Additional Information:**

Manufacturer contacted. Manufacturer stated "Patriot" is part of model name, but not engraved on the firearm, so it should not be part of the listing.

Office Use Only

Manufacturer: Pro2A Tactical

Importer: N/A

Model: Pro-15 Pistol

Caliber(s): 5.56 NATO

Pick up

## HANDGUN ROSTER BOARD PETITION

(FOR OFFICE USE ONLY)

IN THE MATTER OF

Pro2A Tactical  
Pro-15 Pistol

HANDGUN ROSTER BOARD  
PETITION NO. 25306

### DIRECTIONS

To submit a petition for a handgun to be considered by the Handgun Roster Board (HRB), the Identifying Information and Petitioner Information must be completed in its entirety. The petition must be signed by the Petitioner and dated. Please note that each new model requires its own petition and that incomplete petitions may be returned to the Petitioner.

For assistance in determining whether or not a sample should be submitted along with the petition, you may contact the HRB Administrator at 410-653-4247.

Completed petitions must be emailed to [rachel.rosenberg@maryland.gov](mailto:rachel.rosenberg@maryland.gov); faxed to 410-653-4250; or mailed certified or registered mail, return receipt requested, or delivered by hand to:

Maryland Handgun Roster Board  
Maryland State Police  
1201 Reisterstown Road  
Pikesville, Maryland 21208

Arrangements for the hand delivery of petitions must be made in advance with the HRB Administrator.

### IDENTIFYING INFORMATION

- Description: Pro2A Tactical - A/B Pistol
- Manufacturer: Pro2A Tactical
- Importer: Pro2A Tactical
- Model: Pro 15 Pistol
- Caliber(s): 5.56 Nato
- Safety Mechanism – Type(s) of Safety: Manual Safety

02-05 (12-21)

RECEIVED SEP 10 2025

- Was this handgun manufactured after 1/1/85:  
 Yes       No
- Overall length: 26.7 inches
- Barrel length: 10.5
- Technical specifications: 5in 5.56 Nato M-10k AR pistol
- Additional information the petitioner believes would aid the Board in its deliberations:  
\_\_\_\_\_  
\_\_\_\_\_
- Suggested Retail Price: \$649.00

PETITIONER INFORMATION:

Name: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Phone: \_\_\_\_\_  
E-mail: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
Date 6/25/25

RECEIVED SEP 10 2025



**P2A PATRIOT 10.5" 5.56 NATO 1/7 Carbine Length Melonite M-LOK Pistol with Flash Can**  
\$849.99

**OPTION DETAILS**

**HANDGUARD:** Want to tuck your suppressor inside the rail? Now you can with the Aero Precision Enhanced Gen 2 M-LOK Handguards. Choose from the available lengths in the options menu. Check and verify the dimensions of your suppressor and the handguard. Available in Black only.

**GAS BLOCK:** Standard or Adjustable. Adjustable is a great option if you are using a suppressor or just want to fine tune your system:

**BRACE:** Standard Blade or SBA3 Brace. SB Tactical SBA3 Brace is adjustable on the fly and features a minimalist design, integral and ambidextrous QD Sling socket and capable of accepting milspec carbine buffer tube extensions.

**SIDE FOLDING:** No or Yes. The Sylvan Arms Folding Stock Adapter allows you to fold your stock and significantly reduce the length of your rifle for easy stow and travel.

**TRIGGER:** Standard Milspec, Rise Armament RAVE 140 or Timney Impact. Milspec is a 5-6lb pound trigger. Rise/Timney has a single stage, crisp clean break, 3-3.5lb trigger pull.

**UPPER RECEIVER:** AR-15 Mil-Spec Machined out of 7075-T6 Forged Aluminum, M4 Feed Ramps, Type III Hardcoat Anodized Black with Forward Assist and Ejection Port Cover Installed

**BARREL:** 10.5 inch, 5.56 NATO Caliber, 4150 Chrome Moly Vanadium Steel, 1:7 Twist, Medium Profile, Nitride/Melonite Treated - made for us by Tactical Kinetics

**HANDGUARD:** 12 inch M-LOK Free Floated, Machined out of 6061 T6 Aluminum – made for us by Ghost Firearms

**GAS SYSTEM:** Carbine Length, Direct Impingement, Stainless Steel Tube  
**GAS BLOCK:** Low Profile Gas Block, Machined out of 4140 Steel  
**MUZZLE DEVICE:** Standard 1/2-28 A2 Slimline Flash Can  
**LOWER RECEIVER:** Milspec AR-15, MACHINED out of 7075-T6 Forged Aluminum, Type III Hardcoat Anodized Black  
**BOLT CARRIER GROUP:** 223/5.56 Callber, M16 Profile, Mil-Spec, MP Tested, Nitride Treated, Properly Staked Gas Key, 8620 Steel Carrier, 9310 Steel Bolt  
**CHARGING HANDLE:** Standard Charging Handle  
**LOWER PARTS:** Milspec Polished Trigger & Hammer, Standard Grip & Milspec Lower Parts  
**BRACE:** Standard Blade with pistol buffer tube, 3oz buffer, buffer spring, latch plate and castle nut  
**100% MADE IN THE USA**  
**LIFETIME WARRANTY AND SUPPORT\***

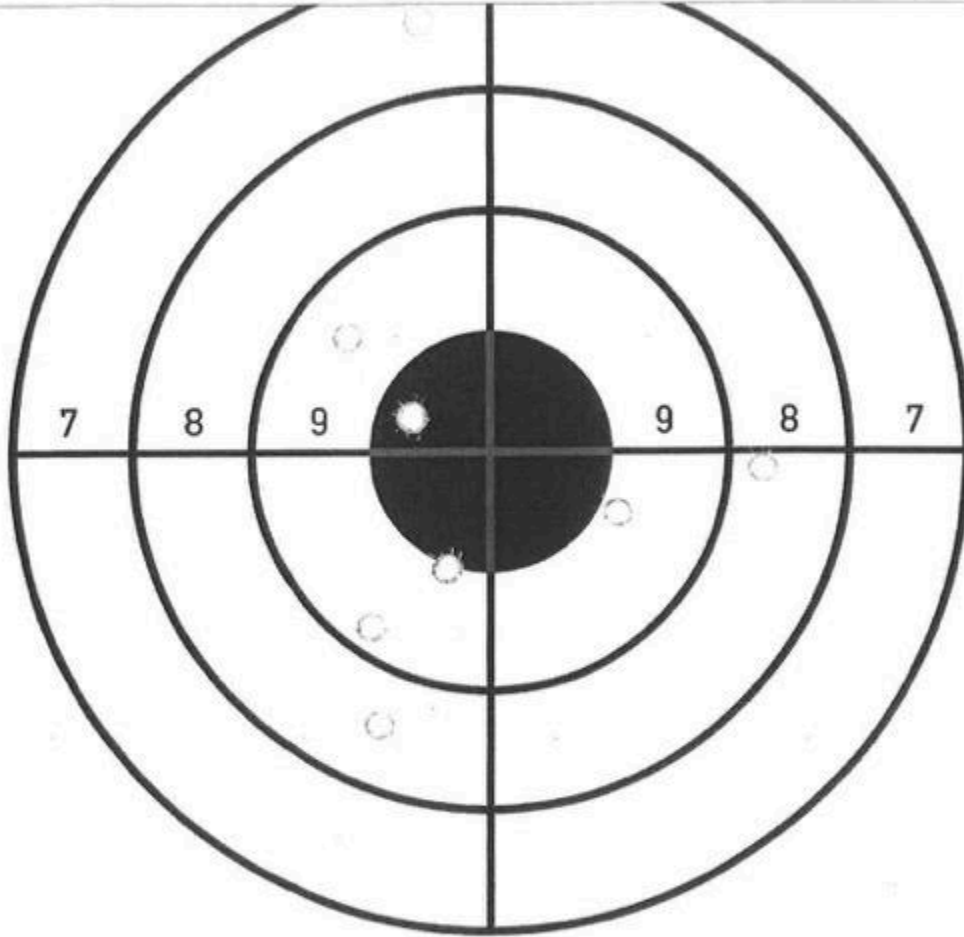
Partnering with some of the best manufacturers in the industry, we bring you a line of rifles and pistols with unrivaled quality for the cost, the "Patriot". Every Patriot firearm is carefully built and assembled by our team of experienced armorers who knows the importance of reliability and repeatability. Every component is manufactured to milspec or better standards to ensure a high quality firearm is produced. Whether it is for sporting, hunting, security or self-defense needs, our Patriot Line of rifles and pistols is more than capable to live up to the task. The Patriot line combines quality with affordability because every patriot deserves it.

FSD FIREARMS/TOOLSMARKS UNIT  
Handgun Roster Board Worksheet

Examiner Name: Kayo Powell Date: 11/26/25  
Examiner Title: FSI Petition #: 25306  
Description of Firearm (Include Model): Semi automatic Firearm  
Model: PEO-15  
Manufacturer Description of Material: Steel barrel + bolt, Polymer receiver  
and grip  
Manufacturer: Pro 2A Tactical  
Manufacture Date After 01/01/1985: Yes  No   
Safety Mechanism - Type(s) of Safety: safety selector  
Safety Mechanism Functional: Yes  No   
Caliber(s): 5.56 NATO  
Weight of Firearm: ~5.6lbs  
Overall Length: ~26 7/8"  
Barrel Length of Firearm: ~12 3/8" (including attachment to muzzle end of barrel)  
Magnetic Detection: Yes  No   
Test Fire Summary: Functional  
Additional Comments: S/N: PMX01387  
Examiner Signature: Kayo Powell  
Administrative Reviewer Initials: AH Date of Review: 12/3/2025  
Approving Authorities: P.ID, Section Manager, FA/TM Unit Supervisor, Director, Dep Director, QAS Manager

02-04 (02-20)

Petition No.: <u>25306</u>	Shots Taken (after corrected aim): <u>9</u>
Test Date: <u>11/25/25</u>	Grouping: <u>7 3/4"</u>
Initials: <u>AH</u>	



02-03 (11-21)



25306	Pro2A Tactical	Pro- 15 Pistol	5.56 NATO	9/10/2025	<p>Maryland Public Safety Article 5-101(n) (1) "Handgun" means a firearm with a barrel less than 16 inches in length. (2) "Handgun" includes signal, starter, and blank pistols. a forearm brace is not defined in Maryland law but is considered an accessory and not a stock due to its design and intended use.</p> <p>Federal Due to challenges under the Administrative Procedure Act, Final Rule 2021R-08F was set aside nationwide and has not been enforced. This page is provided for informational purposes pending further action consistent with Executive Order 14206 entitled "Protecting Second Amendment Rights." 90 Fed. Reg. 9503 (Feb. 7, 2025).</p>	Licensing Division considers this weapon a hand gun since the weapon has a barrel less than 16" and is not designed to be fired from the shoulder. Although this weapon has a folding stock and a "flash can" it does not meet the copy cat definition since it is not a rifle.
-------	-------------------	----------------------	--------------	-----------	---	---