

CAROLYN A. QUATTROCKI
Chief Deputy Attorney General

LEONARD J. HOWIE III
Deputy Attorney General

CARRIE J. WILLIAMS
Deputy Attorney General

SHARON S. MERRIWEATHER
Deputy Attorney General

ZENITA WICKHAM HURLEY
Deputy Attorney General



PETER V. BERNS
General Counsel

CHRISTIAN E. BARRERA
Chief of Staff

STATE OF MARYLAND
OFFICE OF THE ATTORNEY GENERAL

ANTHONY G. BROWN
Attorney General

February 25, 2026

TO: The Honorable J. Sandy Bartlett
Chair, Judiciary Committee

FROM: Tiffany Clark
Director, Legislative Affairs, Office of the Attorney General

RE: House Bill 1339 – Handgun Roster Reform (Support with Amendments)

The Office of the Attorney General (OAG) supports House Bill 1339 – Handgun Roster Reform with the amendments described below. House Bill 1339 reforms Maryland's handgun roster process by transferring legal review and approval authority to the Attorney General and establishing new safety and functionality testing requirements for handguns submitted for placement on the roster.

We appreciate the intent of this legislation to strengthen the legal rigor and accountability of Maryland's handgun roster process and to ensure that only lawful, safe handguns are available for sale in the State. The OAG shares the bill's underlying goals and welcomes the opportunity to bring greater legal expertise and transparency to the roster approval process.

However, to ensure effective implementation and alignment with OAG's operational capacity, we respectfully recommend the following amendments:

The bill, as drafted, transfers to the Attorney General not only the legal review and approval function currently performed by the Handgun Roster Board, but also the physical custody and handling of handgun specimens submitted for the petition process. Requiring the OAG to receive, store, and manage physical firearms would present significant operational and legal challenges. Carrying out these functions would require at least one Assistant Attorney General to obtain a Federal Firearms License (FFL), the acquisition of secure firearms storage facilities, and the dedication of substantial additional staff resources to support the new physical custody

requirements. These obligations are outside the OAG's core legal mission and would impose significant costs and administrative burdens.

We therefore recommend amending the bill to clarify that physical custody, receipt, and storage of handgun specimens submitted for testing and petition review remain with the Maryland State Police or the Handgun Roster Board, while the Attorney General retains the legal review and determination function as contemplated by the bill. This amendment would preserve the bill's central reform, vesting legal approval authority with the Attorney General, without requiring the OAG to take on firearms handling responsibilities for which it is not equipped or resourced.

The OAG also wants to ensure the Committee has complete information about several implementation considerations that bear on other aspects of the bill. The bill's testing requirements, including 500 continuous rounds of live-fire function testing and multi-setting drop and impact testing, are rigorous and resource-intensive. The Maryland State Police currently lacks the specialized equipment required to conduct drop testing, and procuring it would be costly. The 500-round live-fire requirement would also be time-consuming and expensive, and the testing protocol, as designed, would likely render the tested specimen unsellable due to wear or damage. This is a particular concern for individual or small-volume submissions, where the specimen being tested may be the only existing unit, creating potential legal liability for petitioners. Additionally, the bill's requirement to retroactively test all handguns currently on the roster (more than 4,000 firearms) by March 31, 2028 would be an extraordinarily demanding undertaking that may not be feasible within the timeframe provided.

The OAG similarly has workload concerns regarding the retroactive legal review required under § 5-403(l), which directs the Attorney General to reevaluate all handguns currently on the roster for compliance with state and federal law before October 1, 2026. Conducting individualized legal reviews of more than 4,000 existing roster entries within approximately five months of the bill's effective date would require significant additional staffing resources that are not currently available to the OAG.

With these amendments, House Bill 1339 will achieve its goal of a more legally rigorous and accountable handgun roster process while ensuring that each component of the reformed system is administered by the agency best positioned to carry it out. We remain available to work collaboratively with the sponsor and the Committee to refine this legislation.

For the foregoing reasons, the Office of the Attorney General respectfully urges the Committee to give House Bill 1339 a favorable report with the amendment described above.

Cc: Member of the Committee