



March 1, 2022

The Honorable Steven Bradford, Chair
 Senate Public Safety Committee
 1020 N Street, Room 545
 Sacramento, CA 95814

RE: SB 915 (Min): Firearms: State Property - OPPOSE

Dear Senator Bradford:

The undersigned non-profit wildlife conservation organizations must strongly oppose SB 915 – legislation which would prohibit a state officer or employee, or operator, lessee, or licensee of any state-owned property, from contracting for, authorizing, or allowing the sale of any firearm, firearm part, or ammunition on state property. Clearly this legislation targets guns shows and is simply an attempt to further restrict the law-abiding public’s access to firearms and ammunition.

Proponents of similar legislation in the past have tried to falsely argue that gun shows enjoy a “loophole” that allows them to sell firearms and ammunition without complying with the countless laws and regulations which overwhelmingly govern their sale and transfer. However, that claim is untrue. First, promoters and operators of gun shows in California must comply with twenty-six sections of the Penal Code. Second, gun sales are heavily regulated in California and the rules are no less stringent for vendors at gun shows. Vendors that participate in gun shows may not do so unless all their licenses have been submitted to the California Department of Justice (DOJ) before the event for the purposes of determining whether the vendors possess the proper valid licenses and comply with all relevant laws. If they do not pass the review of the DOJ, they are prohibited from participating.

Gun show promoters have a long history of no violent incidences occurring at their shows and have even gone beyond what is required by the state to ensure the safety of attendees. Promoters continue to make improvements to their operational compliance by instituting the following additional safety procedures: retaining the services of retired California DOJ Bureau of Firearms Enforcement Officers to actively monitor activities at the show and contact vendors prior to the show to ensure they are fully compliant with state laws; actively surveilling the show to ensure all merchandise at the show is legal and compliant; maximum scrutiny of anyone bringing in a personal firearm for the purpose of repair, appraisal, or repair, requiring that they have those firearms inspected and tagged before entering the show; barring the possession of both ammunition and a firearm together at a show, except for vendors who sell both; educating attendees that any transfer of a firearm must go through a licensed dealer per applicable law and that a background check and waiting period applies to those transactions; enforcing laws regarding ammunition – including ensuring that only licensed dealers sell ammunition, and that all

ammunition is be kept behind a barrier and out of the reach of the public; requiring that all employees of any ammunition seller have a background check and be in possession of a valid Certificate of Eligibility issued by DOJ; and strictly monitoring shows by security personnel to ensure that no one under the age of 18 is admitted to the show without a supervising adult.

In addition, contrary to the portrayal of gun shows that proponents like to present, gun shows are very much a family affair. Attendees of gun shows are parents, grandparents, competitors, trainers, law enforcement, and other professionals. Many gun shows also include training and education seminars, guest speakers, political discourse, lifestyle vendors, safety training, and much more. The people that attend gun shows are the law-abiding citizens that attend for the educational value and to stay up on new products that are available. It is no different than any other trade show that occurs in other industries across the state.

Further, if SB 915 is passed it will result in costly lawsuits to the state. Nationwide case law has already upheld the legality and constitutionally protection of similar events. (See, e.g., *Nordyke v. Santa Clara County*, 110 F.3d 707 (9th Cir. 1997), *SCOPE, Inc., v. Pataki*, 386 F. Supp. 2d 184 (W.D.N.Y. 2005); *Cinevision Corp. v. City of Burbank*, 745 F.2d 560 (9th Cir. 1984).)

The undersigned organizations strongly support laws which enhance public safety by keeping firearms out of the hands of criminals. However, SB 915 will not achieve that goal. Rather, SB 915 will only further inhibit the ability of California's law-abiding public to have access to firearms, firearms parts, and ammunition. For all the above stated reasons we must strongly oppose SB 915 and urge your strong opposition to this bill when it comes before your Senate Public Safety Committee on March 8th.

Respectfully Submitted,

Don Martin, President
California Chapter – Wild Sheep Foundation

Dan Whisenhunt, Chief Executive Officer
California Deer Association

Lori Jacobs, President
California Houndsmen for Conservation

Ryan Bronson, Director of Government Affairs
Rocky Mountain Elk Foundation

James Stone, President
Nor-Cal Guides & Sportsmen's Association

Mark Hennelly, Vice President of Government Relations
California Waterfowl Association

Steve Miller, President
Tulare Basin Wetlands Association

Gary F. Brennan, President
San Diego County Wildlife Federation

Corey Thompson, President
Cal-Ore Wetland and Waterfowl Council

Chriss Bowles, President
California Bowmen Hunters/State Archery Association

Fred Harpster, President
Black Brant Group

Cathie Nelson, President
San Francisco Bay Area Chapter - Safari Club International

cc: Members, Senate Public Safety Committee
The Honorable Dave Min, Author