



February 16<sup>th</sup>, 2019

Honorable Reginald Byron Jones-Sawyer Sr.  
Chair of the Assembly Committee on Public Safety  
1020 N. Street, Room 111  
Sacramento, CA 95814

**RE: Assembly Bill 311** (Ward) Firearms: gun shows  
**Position: Oppose**

Dear Assembly Member Jones,

On behalf of the California Rifle & Pistol Association Inc. (CRPA), its members and supporters throughout California, I write to express our strong opposition of Assembly Bill 311 (AB 311). CRPA, founded in 1875, works tirelessly to defend the civil and constitutional rights of individuals who choose to responsibly own and use firearms. CRPA promotes the recreational shooting sports, and provides safety, education, and skills training to enable all persons a more enjoyable and safe recreational experience.

AB 311 as introduced will prohibit a vendor at a gun show or event from possessing, displaying, offering to sell, selling, or transferring any firearm precursor parts. The bill would make a violation of these provisions a misdemeanor punishable by a fine not to exceed \$2,000. The bill would prohibit a vendor who has been convicted of a violation of those provisions from participating in any gun show or event in this state for one year after the date of the conviction. AB 311 would make a violation of that prohibition on participating in any gun show or event a misdemeanor punishable by a fine not to exceed \$5,000 and a 5-year prohibition on participating in any gun show or event in the state. The bill would, if a person violates that 5-year prohibition, make that violation grounds for the revocation of any firearm, ammunition, or firearm precursor part vendor license the person holds.

AB 311 is the next step in very misguided legislation directed at legally purchased firearm parts instead of violent criminals who knowingly use firearms in the commission of crimes! In review, Assembly Bill 879 (AB 879), signed into law in 2019 by Governor Newsom, will commencing July 1<sup>st</sup>, 2025 will require firearm “precursor” parts to be treated in the same manner as if they were actual firearms, having to be sold only through a dealer and with a mandated background check. AB 879 specifically addresses parts that could be used to repair an existing firearm, or used to assemble one. Parts include such items as unfinished receivers, and unfinished handgun frames. In and of themselves, these parts do not constitute a firearm and therefore should not be treated as such.

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The mandated part-tracking requirements of AB 879 opens the door for government cross referencing of items purchased with what firearms might be registered in an individual's name. This alone is problematic as it could unwittingly make any legitimate and lawful gun owner into a criminal. The CRPA will continue to support commonsense gun laws focused on violent criminals who choose to use firearms to break the law. However, AB 311 will not do that, instead this proposed law only complicates the ability of law-abiding citizens to obtain parts needed to repair and upgrade lawfully obtained firearms.

This is just the next step in a bad legislative concept that keeps coming back. In the 2015-2016 Legislative Session Assembly Member Gibson introduced AB 1673 which would have expanded the definition of "firearm" to include the frame or receiver of the weapon or a frame or receiver "blank," "casting," or "machined body" that is designed and clearly identifiable as a component of a functional weapon. AB 1673 was vetoed by the Governor. The Governor in his veto message stated, *"I am returning AB 1673 without my signature. This bill seeks to stem tide of untraceable homemade firearms on our streets. While I appreciate the author's intent the actual wording of the unduly vague and could have far reaching unintended consequences. By defining certain metal parts as a firearm because they could ultimately be made into a homemade weapon, this bill could trigger potential application of myriad and serious criminal penalties."*

AB 311 does not take into account the practicality nor the enormity of the task which would be required of the DOJ. Their current responsibilities include the tracking of all firearm purchases, the registration of all purchases and purchasers, background checks and waiting periods, plus similar procedures now for ammunition purchases and purchasers. Already when AB 879 is implemented in 2025, the DOJ will be tasked with recording a staggering number of transactions as firearms are made of literally dozens of parts. Now add to the list of responsibilities patrolling 'gun shows' all over California for 'parts' that are not even clearly defined! All this while the list of over 10,000 known armed prohibited felons continues to grow in California.

We are confused about the authors' intent for this legislation. In July 2016 Governor Brown signed into law Assembly Bill 857 (AB 857) the "ghost gun" serialization requirements. AB 857 already makes it illegal to turn any "precursor part" into a firearm without proper registration and serialization from DOJ (and completion of a background check). Which begs the question what is the true intent and necessity of AB 311? However, even as AB 311 is introduced and further compounds the workload of DOJ, we are still waiting for the definition of what "parts" are worthy of being "precursor parts?"

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The safety of Californians is at the very foundation of our organization. It has been our consistent goal to work toward common sense solutions regarding the issue of crime and firearm ownership. This can be done, however, without sacrificing our constitutional rights and the ability of the law-abiding to protect their families, hunt, and enjoy competitive shooting events. This certainly can be done without banning lawful Californians' access to legal parts they need to repair the equipment they choose to enjoy. For the foregoing reasons the California Rifle & Pistol Association stands in strong opposition to AB 311 and strongly urges you to vote no on this misguided legislation.

Respectfully Submitted,

Roy M. Griffith Jr.  
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