

February 13, 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 SB 422.

This bill is creating excessive burdens on wear and carry permit holders simply for the sake of discouraging applicants, and entangling permit holders in a web in which they violate the law and lose their permit. Requiring yearly training, on 2 separate days, for the permit holders who are already among the most trained and restricted permit holders in the country is completely unnecessary. There is no good reason for the training to be broken up into 2 days, aside from being a blatant attempt at inconveniencing permit holders. Permit holders already receive 16 hours of initial training, and their first permit is only good for 2 years. They must then complete 8 hours of training, and then subsequent permits are good for 3 years, requiring the 8 hours of training for each renewal. Current law requires proficiency, and the proposed law only asks for competency. The live fire testing component of the current testing ensures that permit holders have maintained proficiency.

The purported purpose of this bill is public safety. There is no public safety benefit. As more states move towards liberal licensing practices, we have more data proving that concealed carry holders do not contribute to crime. The January 2019 study published by the American College of Surgeons found this conclusion: "This study demonstrated no statistically significant association between the liberalization of state level firearm carry legislation over the last 30 years and the rates of homicides or other violent crime. Policy efforts aimed at injury prevention and the reduction of firearm-related violence should likely investigate other targets for potential intervention." <https://www.sciencedirect.com/science/article/abs/pii/S107275151832074X> Information provided by the Violence Policy Center (VPL) shows only 2 killings by permit holders in Maryland. A murder in 2011, and a murder/suicide in 2010. Studies also show that concealed carry permit holders are more law abiding than even police officers. <https://www.dailywire.com/news/report-concealed-carry-permit-holders-are-most-law-aaron-bandler> Firearms violations rates for police officers are at 16.5 per 100,000. In Texas and Florida, for permit holders, that rate is only 2.4 per 100,000.

When the Fiscal and Policy note is read, it is even more clear that this bill should not be passed. It estimates General Fund expenditures of \$603,000 in the first year, and up to \$380,200 for subsequent years. This bill, if passed, would put an extremely heavy burden on the Maryland State Police to track if permit holders have completed the required classes, on a much more frequent basis than present. These numbers are based on current permit holder numbers. The number of permit holders is very likely to increase in the near future, based upon court cases that will likely strike down the "good and substantial reason" clause of the current process. This cost will only increase.

Costs for permit holders will increase greatly as well. Currently initial classes range from \$250-\$600, and refresher classes range from \$150-\$300. Instructors are free to charge whatever they would like. It is likely the new proposed annual training will be somewhere

along the lines of current refresher training, but the 2 day mandate would likely drive prices higher than they otherwise would for 8 continuous hours of training. Contrary to what some may believe, firearms owners are not all affluent. This increased cost would affect the most vulnerable the most.

This bill puts an even larger burden on firearms instructors. The state is not carrying any of the burden of providing this training that they mandate, and do not appear to be in the future. The multiple day portion is especially burdensome. There are only so many days, and so many instructors. The Secretary of the MSP must yet approve which courses are deemed acceptable. If firearms instructors are unable to keep up with the likely increasing demand, that will create a de facto ban on permits for those who were unable to get into a class.

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

Katherine Novotny

District 7

443-617-7568

[KNovotny@marylandshallissue.org](mailto:KNovotny@marylandshallissue.org)