

Firstly, let us start with some current facts, as reading through most of the testimony supporting this bill, it's obvious that the vast majority are completely unaware of Federal and State laws with regards to firearms sales by dealers in Oregon:

1. All firearms dealers in Oregon are already licensed by the Federal Government.
2. All firearm dealers have to go through an application process and background check, and have to renew their license.
3. A license fee is already paid on this license
4. All firearm dealers are eligible for inspection at random during their business hours.
5. All firearms sold to individuals in the state of Oregon require a background check administered by the State.
6. All firearms sold on-line must be either transferred through a dealer to an individual within Oregon or to another dealer if sold interstate.
7. Dealers already have storage requirements, record keeping requirements and multiple sales requirements.
8. Firearms dealers are already required to keep records of firearms transactions.
9. It is a Federal offense to knowingly sell firearms to a straw buyer.

Here are some extremely burdensome requirements I have found in the bill:

1. Before writing this bill, did anybody actually sit down a figure out how much storage space is required to keep video records for 5 years? As a point of reference Oregon, law enforcement

agencies are only required to retain body-worn camera footage for 180 days! So, we're going to require firearm dealers to retain theirs for more than 10 times that?

For most small firearm dealers, 5 years would be in the realm of 150 terabytes of data. At an average hard drive cost of \$22 per terabyte, a system would require \$3,300 of hard drives alone, then probably another \$5,000-\$15,000 for the rest of the surveillance system and installation. If that's not an undue burden, I don't know what is.

2. The Bureau of Alcohol Tobacco and Firearms (BATF) already requires that 4473 transaction records be kept as long as the dealer is in business (it used to be 20rs, but this was recently changed), and are responsible for their safe keeping.

When they go out of business these forms are sent to the ATF tracing branch.

This bill requires that they now be kept in a secure container "*designed to prevent loss by fire, theft or flood.*"

As far as I'm aware there are no filing cabinets of this type available. There is no UL certification for a fire AND flood resistant container.

Whilst small fire listed containers do exist that claim to also provide water resistance, the biggest I could find was 0.4 cubic ft and has a list price of \$445. The average 3-draw filing cabinet is 8.66 cubic ft, so you'd need 22 of these at a list price of \$9790 to replace one filing cabinet. Most dealers I know have

3-4 filing cabinets. Some, who have been in business for a long time might have dozens!

Items of concern:

1. As per this proposed legislation “A licensee may not sell or transfer a firearm outside of the licensee’s posted business hours” How does that work in the case of an online sale where a purchaser (possibly) in another state buys a firearm from the Oregon dealer via say a website? Is the sale considered to be taking place when the purchaser buys it, or when the Oregon dealer ships the firearm to the purchasers dealer? Since website a 24hrs/day does this mean the dealers hours would have to be 24hrs/day?
2. Under the proposed legislation, one of the security requirements is “*A steel security door without a window that is equipped with both a deadbolt and a doorknob lock. The deadbolt must have a minimum bolt diameter of two inches and must enter a reinforced door frame or stud at a minimum depth of two inches.*”  
Is the two inch requirement for the diameter of the deadbolt a misprint? I’m not aware of any commercially available deadbolt with a two inch DIAMETER. Most security doors are only 2 inches thick or less themselves. Is it possible that two in bolt throw distance is what was meant?

In addition this part of the legislation offers several options for door security. What's bizarre is that doors that are of a lower security rating, don't have this same requirement for the lock!

3. Under the proposed legislation someone who inherits more than 30 firearms and wants to dispose of them to a firearms dealer, must themselves go and get licensed as a firearms dealer, and meet all the storage and other requirements. If they don't want to do this, it would essentially force them to keep those firearms indefinitely.
4. There does not appear to be any exemption requirement from the surveillance cameras for gunshows. The dealer cannot rely on the gunshows location surveillance cameras as:  
*“A licensee may not use, share, allow access or otherwise release surveillance system recordings to any person except as follows:*  
*“(A) A licensee shall allow access to the surveillance system to an agent of the department conducting an inspection of the licensee’s premises, for the purpose of inspecting the system for compliance with this section under circumstances in which a search warrant or court order is not required.*  
*“(B) A licensee shall allow access to the surveillance system pursuant to a search warrant or other court order.*  
*“(C) A licensee may allow access to the surveillance system or may release recordings to any person in response to an insurance claim or as part of the civil discovery process, including but not limited to in response to a subpoena, a request for production or inspection or other court order.”*

5. The above surveillance camera requirements don't even allow the dealer to be able to get repairs or servicing done as this would be giving some access to the camera system. Does this mean they must do all maintenance themselves once the system is up and recording? It would also preclude them from using any form of cloud backup system.

Lastly the bill states *“This 2025 Act being necessary for the immediate preservation of the public peace, health and safety, an emergency is declared to exist, and this 2025 Act takes effect on its passage.”*

This statement is an oxymoron, as the bill does literally nothing that will prevent firearm homicide deaths in Oregon. For example, someone with undiagnosed depression or mental health issues decides to purchase a firearm and shoot up a school. Nothing in this Act would prevent that from happening. All we would get is video footage of them purchasing the firearm!

If you want to prevent firearm homicide deaths, your solution needs to be a social/cultural one. How do I know this? Well for example, in 1965, you could walk into a gun store and purchase an AR15 with no license, background check or anything. In fact you didn't even need to be 18. You could also have ordered one via mail.

What we didn't have was individuals regularly entering public places like schools and murdering people.

Have you asked yourself why? Since access firearms has gotten harder there must be some other reason this is happening. My

suggestion is that social norms among other things dictated that people just didn't do things like that.

Here's another interesting fact. 2% of the population (African American males ages 18-25) in the U.S. are responsible for over 60% of firearm homicides. Being of African American heritage myself, but not seeing this in my social and cultural groups, it's obvious there is some systemic issue within the social norms and culture in the communities in which these individuals live, that is causing this anomaly. Creating unduly burdensome regulations on firearm dealers is not going to fix that issue. It has to be initiated and worked on at a micro level within that community. Tell me you're going to put tax payer money towards programs like that and I'll definitely support it.