



REPORTER

SCOTUS DENIES CERT IN WORTH, SAF WIN IN EIGHTH CIRCUIT STANDS

In a case that could potentially have far-reaching implications for similar lawsuits across the nation, the U.S. Supreme Court has denied Minnesota's Petition for Writ of Certiorari in *Jacobson v. Worth*, the Second Amendment Foundation's (SAF) challenge to the 18-20-year-old carry ban in the state.

Minnesota asked the Supreme Court to take the case after SAF was granted an injunction at the district court and the Eighth Circuit Court of Appeals affirmed.

The high court's refusal to hear the case means the Eighth Circuit's ruling stands as a final judgment, confirming SAF's win.

"We are encouraged with today's

ruling, that the Supreme Court was happy to let the Eighth Circuit Court of Appeals' decision that 18-20-year-olds are part of 'the People' who have the right to carry a handgun for self-defense, stand," said SAF Director of Legal Operations Bill Sack. "This ruling will have reverberations nationwide, where SAF is involved in multiple similar suits, seeking to restore the rights of young adults who face similarly unconstitutional laws in their home states."

Originally filed in June 2021 as *Worth v. Harrington*, SAF is joined by the Minnesota Gun Owners Caucus, Firearms Policy Coalition, and three private citizens, Kristin Worth, for whom the case is named, Austin Dye,

and Axel Anderson.

They are represented by attorneys David H. Thompson, Peter A. Patterson, John D. Ohlendorf and William V. Bergstrom at Cooper & Kirk in Washington, D.C.

"This cert denial confirms what we've said all along – the Second Amendment is not limited to those 21-years-old and above," said SAF founder and Executive Vice President Alan M. Gottlieb. "We are cautiously optimistic the denial will have a positive impact in SAF's challenges to similar bans in other states. Our goal is to remove any impediments for adults – no matter their age – to exercise their Second Amendment rights wherever they live."

SAF WIN IN CALIFORNIA'S ONE-GUN-PER-MONTH LAWSUIT

In a unanimous decision, the Ninth Circuit Court of Appeals ruled in favor of SAF and its partners in *Nguyen v. Bonta*, SAF's challenge to California's one-gun-per-month gun rationing law.

SAF is joined in the case by FPC, and San Diego County Gun Owners PAC, two FFL gun dealers, and six private citizens including Michelle Nguyen, for whom the case is named.

"This decision claws back a portion of Second Amendment rights stolen by California's government," said SAF Executive Director Adam Kraut. "California's one-gun-per-month law was in clear

violation of the Second Amendment, as affirmed by the unanimous decision in the Ninth Circuit. This ruling is one step closer to liberating the people of the state from the totalitarian ideals of those in power who believe the right to keep and bear arms is a second-class right."

The lawsuit challenges the California statute that only allows for the purchase of one handgun or semi-automatic center-fire rifle (or combination thereof), from a licensed dealer within a 30-day period. SAF secured a summary judgment win at the district court, which California then appealed to the Ninth Circuit. The deci-

sion affirms SAF's district win and strikes down the gun rationing law as impermissible under the Second Amendment.

"There was no doubt the one-gun-per-month restriction was put in place to circumvent the ability of citizens to exercise their full Second Amendment rights," said SAF founder and Executive Vice President Alan M. Gottlieb. "This ruling is a victory for all who believe in the fundamental right to keep and bear arms, and we look forward to continuing to restore the Second Amendment rights of people across the nation through our more than 55 active cases."

EXECUTIVE DIRECTOR'S MESSAGE: MID-YEAR CHECK IN

As we've crossed over the halfway point of 2025, it's important to pause and review what has happened so far this year. The Trump Administration has done a significantly better job on delivering Second Amendment wins relative to his first term.

Those wins include abolishing the Office of Gun Violence Prevention, introducing a final rule to reestablish federal firearms relief determination hearings - a program that has been defunded by Congress since 1993. In addition, the civil rights division of the Office of the Attorney General is investigating Los Angeles for excessive CCW Permit delays and the administration is changing litigation positions to include acknowledging that "assault weapons," magazines capable of holding more than ten rounds, and silencers are protected "arms" under the Second Amendment. They also filed an amicus brief with SCOTUS supporting the petitioners' challenge to Hawaii's carry ban, and more.

Congress managed to pass portions of the Hearing Protection Act (HPA) and SHORT Act through the reconciliation process in the One, Big, Beautiful Bill (OB BB). Reconciliation presented a unique opportunity to pass some pro-gun legislation that normally would not be possible. Because the HPA and Short Acts had budgetary impact, Republicans were able to use the process to advance those bills. While ultimately the OB BB did not go as far as gun owners

may have hoped, it did signify the first major step in dismantling the National Firearms Act (NFA) by altering the tax to manufacture and transfer silencers, short-barreled firearms, and "any other weapons" from \$200 to \$0 (transfers for "AOWs" from \$5-\$0). As a result, the doorway to litigation challenging the inclusion of those items in the NFA has been propped open. Since there is no longer a tax on the manufacture or transfer of those items, the registration scheme for those firearms no longer serves a purpose, as it was to record if an individual had paid the tax. By the time this lands in your mailbox, SAF and its partners will have likely filed its challenge to the continued inclusion of these firearms in the NFA.

Unfortunately, other federal legislative advancements seem unlikely due to the composition of Congress. While Republicans control the House and maintain a slim majority in the Senate, there are not enough Senate Republicans to defeat the filibuster (which requires 60 votes to end debate and bring a bill to a vote).

The Supreme Court's decision in *Smith and Wesson v. Mexico*, was the first time the Court grappled with the Protection in Lawful Commerce in Arms Act (PLCAA). Fortunately for gun owners, and the industry, the Court determined that PLCAA barred Mexico's lawsuit from moving forward. Unfortunately, the Court declined to hear SAF's Maryland assault weapons



ADAM KRAUT
EXECUTIVE DIRECTOR

ban challenge, but not without comment. Justices Thomas, Alito, and Gorsuch would have granted the petition. Kavanaugh issued a statement respecting the denial of the petition but noted that he believed the court should and would hear one of the other pending challenges in the next term or two. Four votes are needed for a cert grant and it appears Kavanaugh was the hold out.

I'm excited to announce that we have hired Kostas Moros to join our team as our Director of Legal Research and Education. If you're a user of X (formerly known as Twitter) give him a follow @MorosKostas. His explainer threads are some of the best on the platform and will keep you informed of the latest happenings in the courts.

As we march into the second half of 2025, SAF is continuing to build on the momentum that it has. New lawsuits are coming and hopefully, by the year's end, we'll be in position to announce our new education program. To those attending this year's GRPC...I'll see you there.



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CALIFORNIA NON-RESIDENTS CAN APPLY FOR CARRY PERMIT

Thanks to a preliminary injunction in the SAF's case *CRPA v. LASD*, non-resident SAF members can apply for a California carry permit.

The injunction requires that California accept permit applications from any United States resident outside the state who is a member of SAF or its partner organizations and not prohibited from possessing firearms. SAF was joined in the case by the CRPA, GOA, GOF, GOC, and several private citizens.

"As you might imagine, the state of California is not wanting to make it easy for non-residents to apply for a carry permit," said SAF Executive Director Adam Kraut. "As a SAF member and non-resident of California, however, you're allowed to apply. The main thing to keep in mind is that you need to submit your application through the sheriff or police department for the county you plan to



visit. The order specifically lists how to apply, so that's the best place to find the exact information you need."

United States District Court Judge Sherilyn Peace Garnett's Jan. 22 order sets forth the following criteria for those applying for the newly available non-resident permits:

** Must be a member of SAF or other partner organization included in the lawsuit. * Applicants must file the application*

*with the sheriff or chief of police in a county in which they plan to visit in the next 12 months. * Must be a U.S. citizen or legal resident and not prohibited from possessing firearms. * Non-residents receiving a California permit can only carry handguns and magazines that are legal to possess in California.*

"This case had the appropriate conclusion – non-residents should not have their Second Amendment rights stripped just because they crossed a state line," said SAF founder and Executive Vice President Alan M. Gottlieb. "Now, thanks to SAF and its partners, all you have to do is be a member and you'll be allowed to apply for a permit no matter where you live. The best part is you didn't have to be a member of SAF when the ruling was issued, you can still join today and apply for your non-resident carry permit."

SAF LAWSUIT CHALLENGES UNDER 21 HANDGUN BAN IN CONNECTICUT

The Second Amendment Foundation (SAF) and its partners have filed a lawsuit in federal court challenging Connecticut's ban on adults under the age of 21 from purchasing, owning or carrying handguns.

"Second Amendment rights cannot be withheld from peaceable adults based on their age," said SAF Executive Director Adam Kraut.

"To do so would relegate the amendment's guarantees to second-class status, which offends the very notion of the Constitution's premise. Our nation's history and tradition does not support this 'Second Amendment lite' version being offered to 18-20-year-olds in Connecticut. This lawsuit seeks to vindicate the rights of those individuals who are being unlawfully



discriminated against based solely on their age."

In the case, *Succow v. Bondi*, SAF is joined by the Connecticut Citizens Defense League and two individuals, Samuel Towne and Zachary Succow. They are represented by attorneys Doug

Dubitsky of the Law Offices of Doug Dubitsky, Craig Fishbein of Fishbein Law Firm and Cameron Atkinson of Atkinson Law.

As noted in the complaint, "There is simply no historical analogue prohibiting adults under 21 from purchasing, acquiring, possessing, or carrying handguns nor of banning otherwise lawful commerce between firearm dealers and adults under 21."

"This makes 10 lawsuits SAF has filed across the country on behalf of adults in this age group," said SAF founder and Executive Vice President Alan M. Gottlieb. "And in each of those lawsuits the premise remains the same – depriving adults who are 18-20 years old of their constitutional rights is illegal, full stop."

SILENCER SHOP RENEWS SAF PARTNERSHIP AT DIAMOND LEVEL

SAF is pleased to announce that Silencer Shop – the largest silencer distributor in the United States – has renewed their commitment to the organization as a Diamond-level corporate partner.

“Silencer Shop stands with the folks who are out there fighting for our rights – and that’s exactly what the Second Amendment Foundation does,” said Silencer Shop’s CEO and founder Dave Matheny. “They’ve shown they can win real battles where it counts and make positive change for gun owners. We’re proud to continue to support SAF, as the industry is strongest when we stand together.”

Located in Austin, Texas, Silencer Shop’s mission is to make suppressors



as easy and accessible as possible for responsible gun owners. Through their Powered by Silencer Shop dealer network the company supports local gun stores, and purchasing through Silencer Shop directly supports advocacy efforts and the protection of our Second Amendment rights. Along with their corporate partner renewal, Silencer Shop also supports SAF’s legal efforts through product, tax stamp and single-shot trust donations for SAF’s monthly sweepstakes fundraiser or other events. In addition, Silencer Shop most recently came on

board as a sponsor of the annual Gun Rights Policy Conference.

“Silencer Shop has been a steadfast SAF advocate, and their continued support is certainly appreciated,” said SAF Executive Director Adam Kraut. “It’s great to have a partner that recognizes the benefits of our work in courts across the nation. Whether it’s their corporate partner renewal, product donations or sponsorship of GRPC, Silencer Shop’s unwavering commitment to SAF is refreshing when there are people who continue to try and find ways to disarm peaceable citizens every chance they get.”

For more information about SAF’s corporate partner program, contact Senior Vice President Lauren Hill at lhill@saf.org.

TAURUS RENEWS PLATINUM-LEVEL CORPORATE PARTNERSHIP

The Second Amendment Foundation (SAF) is pleased to announce that Taurus Holdings Inc. has renewed their commitment to the organization as a Platinum-level corporate partner.

“At Taurus, we believe that the right to keep and bear arms is fundamental to the American way of life,” said Taurus USA Marketing Director Michael Marotte. “Supporting the Second Amendment Foundation means standing behind the essential legal work they do to protect those rights for responsible gun owners across the country. We’re proud to contribute to their mission and ensure that the Second Amendment is preserved not just today, but for future generations.”

Founded in 1982, Taurus Holdings Inc. is a Georgia-based holding company that owns some of the most robust firearms brands currently available on



the U.S. market. The company’s tag line is “Commitment to Excellence,” and is owned by the famous public Brazilian firm Taurus Armas, S.A. Taurus Armas not only builds the firearms for which it is rightfully famous, but also an incredible array of globally distributed consumer and industrial products.

Along with renewing their Platinum-level partnership, Taurus also supports SAF through other avenues such as

the monthly sweepstakes program. In January, the company donated a new Expedition rifle to help raise funds for SAF’s legal efforts.

“Taurus’ renewed commitment is a testament to their belief in SAF’s mission to defend, secure and restore our Second Amendment freedoms,” said SAF Senior Vice President Lauren Hill. “We’re excited to continue the partnership as we work together to fight those who wish to infringe upon our right to keep and bear arms. SAF has fought unconstitutional firearms regulations in courtrooms across the nation for more than 50 years, and thanks to the support of partners like Taurus, we’ll continue the fight.”

For more information about SAF’s corporate partner program, contact Hill at lhill@saf.org.

SUPREME COURT STRIKES DOWN FIREARMS INDUSTRY LAWSUIT

In a landmark ruling, the U.S. Supreme Court handed a major win to the firearms community by throwing out the First Circuit's ruling in *Estados Unidos Mexicanos v. Smith & Wesson Brands, Inc., et.al.*

Originally filed in 2021, the lawsuit sought billions in damages alleging the American gun manufacturer was liable for Mexican drug cartel violence.

The case had been properly dismissed by the district court, but that decision was subsequently reversed by the First Circuit Court of Appeals, allowing the case to proceed. SAF filed an important Amicus Brief with the Supreme Court in the case explaining how bad lawfare against gun manufacturers ultimately hurt the American public by

choking out access to constitutionally protected goods.

"The ultimate goal of this lawsuit was simple – bankrupt the firearms industry, at the ultimate peril of the American people," said SAF Executive Director Adam Kraut.

"Thankfully, the Supreme Court saw through this thinly veiled attempt to wield the legal system as a cudgel against lawful commerce."

SAF's brief in the case outlined the history of firearms litigation and explained why both the Protection of Lawful Commerce in Arms Act (PLCAA) and common law prohibit lawsuits premised on the legal theory Mexico – in cahoots with multiple gun control groups – attempted.

Put simply, gun manufacturers cannot be held liable for lawfully manufacturing and placing into the stream of commerce, legal (and constitutionally protected) goods, if ultimately those goods are criminally misused.

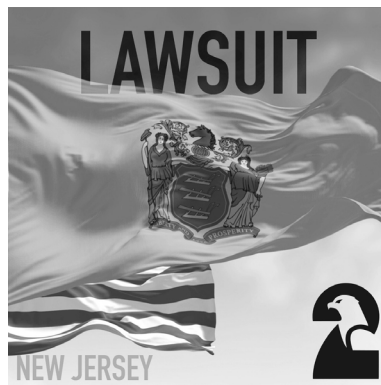
"Mexico was merely trying to hold U.S. firearms manufacturers responsible for cartel violence committed in their country," said SAF founder and Executive Vice President Alan M. Gottlieb. "This is exactly the type of bad faith lawsuit the PLCAA was designed to block at the courtroom steps. In reaffirming these basic principles, the Supreme Court has sent a clear message to that they're going to need to go back to the drawing board to invent a new disingenuous way to attack our rights."

SAF LAWSUIT CHALLENGES UNDER 21 HANDGUN BAN IN NEW JERSEY

The Second Amendment Foundation (SAF), joined by New Jersey Firearms Owners Syndicate (NJFOS), have filed a lawsuit in district court challenging New Jersey's ban on adults under the age of 21 from purchasing, owning or carrying handguns and handgun ammunition. New Jersey's statutory regime bans adults under 21 from acquiring, possessing and carrying a handgun for self-defense, as well as purchasing handgun ammunition. This new case makes clear the Constitution and the Supreme Court recognize every peaceable adult has the right to acquire, possess and carry a handgun for their self-defense. Adults under 21 are no different as they are part of "the People."

"There is not, and never has been, a constitutionally grounded basis for depriving adults under 21 from owning

or possessing handguns, period," said SAF Executive Director Adam Kraut. "Adults 18-20-years-old are part of 'the People' and can exercise their full Second Amendment rights. Unfortunately, residents of this age group living in New Jersey are being selectively discriminated against solely based on their age, and we aim to rectify that."



In the case, *Hague v. Murphy*, SAF is joined by NJFOS and Lily Hague, for whom the case is named. As noted in the complaint, "Simply no historical analogue exists for prohibiting adults under 21 from purchasing, acquiring, possessing, or carrying handguns nor for banning otherwise lawful commerce between dealers and adults under 21."

"New Jersey's handgun and ammunition ban absolutely infringes on the Second Amendment rights of all resident adults under 21 in the state," said SAF founder and Executive Vice President Alan M. Gottlieb. "Each of our age-based lawsuits around the country have the same goal – restoring the rights of adults under 21 who have been disenfranchised by those who think they can trample on their Second Amendment rights purely based on their age."

SAF FILES BRIEF IN ILLINOIS ASSAULT WEAPONS BAN LAWSUIT

The Second Amendment Foundation (SAF) and its partners have filed their brief with the Seventh Circuit Court of Appeals in SAF's challenge to Illinois' assault weapons and magazine capacity bans.

SAF is joined in *Harrel v. Raoul* by the Illinois State Rifle Association, Firearms Policy Coalition, C4 Gun Store, Marengo Guns and Dane Harrel, for whom the lawsuit is named.

The case challenges the constitutionality of the Illinois assault weapons and magazine capacity bans, on the grounds that both modern semiautomatic rifles, and the standard capacity magazines that feed them, are overwhelmingly in common use for lawful purposes, including self-defense. Twice now, the District Court has agreed and ruled in SAF's favor, first in granting a preliminary injunction, and



then on the merits on remand. With a full trial record now before it, the Seventh Circuit has a second opportunity to properly apply the Heller/Bruen test and leave these Illinois statutes in the wastebasket of history.

"SAF is litigating seven cases around the country against so-called as-

sault weapons bans," said SAF Executive Director Adam Kraut. "We're challenging the Illinois ban, and others like it, as they fly in the face of the Second Amendment and the Supreme Court's interpretations in both Heller and Bruen. The modern semiautomatic rifles banned in Illinois are among the most commonly owned firearms in the country, placing them well within the protection of the Second Amendment."

"Illinois legislators may disagree with the Constitution and the Supreme Court, but they don't get to thumb their nose at both and ban broad categories of popular arms," said SAF founder and Executive Vice President Alan M. Gottlieb. "The Second Amendment demands the protection of all semiautomatic rifles like the AR-15 and those like them. Hard stop."

KOSTAS MOROS NAMED DIRECTOR OF LEGAL RESEARCH AND EDUCATION

SAF is pleased to announce the hiring of Kostas Moros as Director of Legal Research and Education.

Moros brings 10 years of experience to the SAF team with six years directly litigating Second Amendment cases in California. His accomplishments include helping preliminarily enjoin several aspects of California's overbearing "gun free zones" law that the State passed to undermine the right to carry, and he was instrumental in making non-resident carry a reality for the first time in California's modern history. Moros is a member of several federal circuit courts, as well as the Supreme Court Bar, and has authored numerous amicus briefs and a law review article. He maintains a very active presence on X under the handle @MorosKostas.

"Along with other members of the



SAF team, I have worked with Kostas for several years and have seen firsthand the quality of his work and the passion he has for protecting our right to keep and bear arms," said SAF Executive Director Adam Kraut. "We're excited to have Kostas join the team as a full-time employee and look forward to watching SAF's research and education programs grow under his leadership."

In his new role, Moros is responsible for producing original research and policy positions for publication, coordinating and preparing amicus briefs and handling or assisting litigation as needed.

He will also help identify educational opportunities for the organization and see those through to completion.

"I've worked in the Second Amendment litigation space in California for several years, but I am excited about the opportunity this new role presents," Moros said. "While California remains a hotbed of gun control rhetoric and senseless laws, this new position will allow me use my past experience to help SAF ensure our constitutional rights are defended, secured and restored across the nation."

COALITION FILES JOINT LAWSUIT TO OVERTURN NJ SUPPRESSOR BAN

A coalition of six leading gun rights organizations comprised of the Second Amendment Foundation (SAF), American Suppressor Association (ASA), National Rifle Association (NRA), Safari Club International (SCI), Association of New Jersey Rifle & Pistol Clubs (ANJRPC) and the New Jersey Firearms Owners Syndicate (NJFOS) announced the filing of a joint federal lawsuit in the District of New Jersey challenging the state of New Jersey's unconstitutional ban on firearm suppressors.

Also known as silencers, suppressors are hearing safety devices that reduce the noise of a gunshot by an average of 20 to 35 decibels. That is why the Centers for Disease Control, the National Institute for Occupational Safety and Health, the National Hearing

Conservation Association, the Academy of Doctors of Audiology, the American Academy of Otolaryngology-Head and Neck Surgeons, and Doctors for Responsible Gun Ownership all recommend the use of suppressors as a tool to mitigate preventable hearing damage. Suppressors are "arms" under the Second Amendment and enjoy the same constitutional protection as the firearms they are attached to. The government cannot categorically ban them without first proving a historical tradition of such bans – a burden it cannot meet.

"New Jersey's total ban on silencers deprives the state's residents of access to constitutionally protected arms," said SAF Executive Director Adam Kraut. "Silencers are nothing more than mufflers designed to mitigate the damage

caused to a user's ears when firing a gun, no different than the muffler found on automobiles. Additionally, their use provides benefits to the surrounding communities by mitigating the noise created when shooting guns. Former President Theodore Roosevelt was known to use these devices while hunting and they are commonly used in Europe, which is anything but gun friendly. Lawmakers rely on Hollywood's characterization of these tools to justify keeping their heads in the proverbial sand. We look forward to working with our partners to overturn this unconstitutional ban."

"This case will send shockwaves through the New Jersey statehouse, where lawmakers pretend that the Second Amendment doesn't apply to them," said Scott Bach, ANJRPC's Executive Director.

SAF APPLAUDS DOJ PROPOSED RIGHTS RESTORATION RULE

The Second Amendment Foundation (SAF) announced support for the proposed Department of Justice rights restoration rule submitted today and is encouraged to see a process for firearms rights restoration begin to materialize.

Since 1968, federal law provided a pathway for federal firearms rights restoration, which up until 1993, ATF regularly granted.

Unfortunately, in 1992, Congress passed the first of many appropriation riders that prohibited the use of any money appropriated to ATF for use in conducting federal firearms relief determinations.

The proposed rulemaking, combined with the Attorney General's interim rule rescinding the delegation of authority to ATF to conduct these determinations, finally provides a process

for many eligible nonviolent offenders to have their rights restored.

The Department of Justice estimates that one million applicants are expected to take advantage of this new pathway back to the Second Amendment in the first year.

"Having litigated as-applied challenges for a number of disenfranchised individuals, it's good to see that this proposed rule provides a pathway to restore their rights," said SAF Executive Director Adam Kraut.

"For years, the only mechanisms available for relief from a federal firearms disability were the all but impossible pardon, seemingly illusory expungement that did not satisfy federal requirements, or an expensive and uncertain route of litigation. The reestablishment of a federal firearms

relief determination program will enable millions of Americans to regain their ability to exercise their Second Amendment rights."

As stated in the proposed rule, "This rulemaking reflects the Department's commitment to the Second Amendment as an indispensable safeguard of security and liberty and a policy decision that the Department must find a way to both advance public safety and ensure that the rights of the people enshrined in the Constitution are not infringed."

"This proposed rule to grant relief to certain individuals convicted of non-violent crimes is long overdue," said SAF founder and Executive Vice President Alan M. Gottlieb. "The Second Amendment Foundation has been fighting for decades in courts to restore rights to people who are no threat to society."



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