

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ZACHARY SUCCOW, SAMUEL TOWNE;
CONNECTICUT CITIZENS DEFENSE LEAGUE,
INC.; AND SECOND AMENDMENT
FOUNDATION, INC.,

Plaintiffs,

v.

PAMELA JO BONDI, in her official capacity;
RONNELL HIGGINS, in his official capacity;
MARGARET A. KELLEY, in her official capacity;
PAUL J. NARDUCCI, in his official capacity; JOHN
BUCHERATI, in his official capacity; PATRICK
DALEY, in his official capacity;

Defendants.

CIV. NO. 3:25-cv-250

May 18, 2025

AMENDED COMPLAINT

1. Plaintiffs desire and intend to acquire, and possess a handgun in their home, and to carry that handgun in public for self-defense. Both rights are guaranteed them by the Second Amendment of the United States Constitution. But based solely on their age, as adults under 21 years of age, Connecticut and Federal law act in concert to deny them these rights in their entirety.

2. This is an action to uphold Plaintiffs', and those who are similarly situated, right to keep and bear arms as guaranteed by the Second and Fourteenth Amendments to the United States Constitution. This right "guarantee[s] the individual right to possess and carry" firearms and "elevates above all other interests the right of law-abiding, responsible citizens to use arms in defense of hearth and home." *District of Columbia v. Heller*, 554 U.S. 570, 635 (2008).

3. In *Heller*, the U.S. Supreme Court defined “bear arms” as to “wear, bear, or carry ... upon the person or in the clothing or in a pocket, for the purpose ... of being armed and ready for offensive or defensive action in a case of conflict with another person.” *Id.* at 584.

4. In *McDonald v. City of Chicago*, 561 U.S. 742, 750, 791 (2010), the Supreme Court confirmed that the rights protected by the Second Amendment are “among those fundamental rights necessary to our system of ordered liberty,” and held that the Second Amendment is incorporated as applicable to the states through the Fourteenth Amendment.

5. “The very enumeration of the right [to keep and bear arms] takes out of the hands of government—even the Third Branch of Government—the power to decide on a case-by-case basis whether the right is really worth insisting upon.” *Heller*, 554 U.S. at 634. “Constitutional rights are enshrined with the scope they were understood to have when the people adopted them, whether or not future legislatures or (yes) even future judges think that scope too broad.” *Id.* at 634-35.

6. The “central” – but not the only – holding of the Supreme Court in *Heller* was “that the Second Amendment protects a personal right to keep and bear arms for lawful purposes, most notably for self-defense within the home.” *McDonald*, 561 U.S. at 780. The Second Amendment also “guarantee[s] the individual right to possess and carry weapons in case of confrontation.” *Heller*, 554 U.S. at 592.

7. This is particularly true when it comes to handguns, as the *Heller* Court has explicitly recognized the handgun as “the quintessential self-defense weapon” in the United States, and that a complete prohibition on their carry and use is necessarily invalid. *Id.* at 629.

8. But Defendants’ laws, including, Conn. Gen. Stat. § 29-28(b) Conn. Gen. Stat. § 29-34(b), Conn. Gen. Stat. § 29-34(b), and Conn. Gen. Stat. § 29-36f, 18 U.S.C. § 922(b)(1) and (c)(1); 27 1 C.F.R. §§ 478.99(b)(1), 478.124(a), and 478.96(b); the related regulations, policies, practices, customs designed to implement the same, and Defendants’ continuing enforcement of them, prevent law-abiding, responsible adult citizens under age twenty-one—including Plaintiffs Succow and Towne, and the similarly situated members of Connecticut Citizens Defense League and the Second Amendment Foundation -- from doing so, in violation of the Second and Fourteenth Amendment to the United States Constitution.

9. “[W]hen the Second Amendment’s plain text covers an individual’s conduct, the Constitution presumptively protects that conduct.” *New York State Rifle & Pistol Ass’n, Inc. v. Bruen*, 142 S. Ct. 2111, 2126 (2022). Moreover, “the government must demonstrate that the regulation is consistent with this Nation’s historical tradition of firearm regulation. Only if a firearm regulation is consistent with this Nation’s historical tradition may a court conclude that the individual’s conduct falls outside the Second Amendment’s ‘unqualified command.’” *Id.* (internal citations omitted, emphasis added.).

10. “[T]he lack of a distinctly similar historical regulation...is relevant evidence that the challenged regulation is inconsistent with the Second Amendment.” *Id.* at 2131. Indeed, the relevant historical evidence will show that no such similar regulation existed.

11. Connecticut law prohibits law-abiding adult citizens between the ages of 18 and 20 from purchasing, obtaining ownership of, keeping and bearing (i.e., carrying) handguns – the most popular firearms in the United States – for self-defense and all other lawful purposes.

12. In Connecticut, a person cannot legally transfer any firearm to another person without Connecticut state police approving the transfer before it takes place. To legally obtain a handgun in any manner and to get the Connecticut state police's approval, a person must possess either a state-issued Handgun Eligibility Certificate or a state-issued Pistol Permit.

13. A Handgun Eligibility Certificate allows law-abiding citizens in Connecticut who are 21 years of age or older to purchase a handgun and ammunition for home defense, but not to carry the handgun in public. Adults under 21 years of age may not lawfully obtain, or even apply for, a Handgun Eligibility Certificate.

14. A State Pistol Permit allows law-abiding citizens in Connecticut who are 21 years of age or older to purchase a handgun and ammunition for all lawful purposes, including carrying a loaded handgun in public. Adults under 21 years of age may not lawfully obtain, or even apply for, a State Pistol Permit.

15. To obtain a State Pistol Permit, a Connecticut resident 21-years or older must first apply for and be issued a Temporary State Pistol Permit from the issuing authority in the town or city in which they live, submit to fingerprinting and a background check, and provide proof of successfully completing a firearm safety course, including live-fire training and instruction on Connecticut firearms law. Adults under 21 years of age may not lawfully obtain, or even apply for, a Temporary State Pistol Permit.

16. A Temporary State Pistol Permit is valid for sixty days and does not allow a person of any age to purchase a handgun, but does allow a person 21 years and older to carry a handgun within the boundaries of the specific municipality in which the person resides.

17. Once a Connecticut resident 21-years or older is issued a Temporary State Pistol Permit, the person is allowed, within sixty days of issuance, to apply to the Connecticut State Police for a State Pistol Permit.

18. A State Pistol Permit is valid for five years and allows a person 21-years of age or older to purchase a handgun and ammunition, and to carry a loaded handgun anywhere in Connecticut carrying a handgun is legal.

19. The Connecticut State Police also now require that all legal firearm transfers between individuals be conducted through a Federal Firearms Licensee (“FFL”) as a precondition to approval.

20. Federal law prohibits FFLs from selling or delivering handguns to individuals under the age of 21. 18 U.S.C. 924(b)(1).

21. But for the interaction of these challenged federal and Connecticut laws and administrative policy, adult citizens between the ages of 18 and 20 would be able to lawfully purchase or otherwise obtain ownership of handguns – either from an FFL or a private individual – and to carry handguns in public for self-defense and all other lawful purposes.

22. Collectively, the challenged federal and Connecticut laws and administrative policy impose a complete bar to adults between the ages of 18 and 20 from being able to lawfully purchase, obtain ownership of, and carry handguns, whether in the home or in public, whether for self-defense or any other lawful purpose.

23. The combination of Connecticut state and Federal Government’s Handgun Bans, and Defendants’ actual and threatened enforcement of the same, should and must—

under the text of the Constitution itself, as well as our Nation's history and tradition, and the Supreme Court's precedents—be declared unconstitutional and enjoined.

24. Plaintiffs Zachary Succow and Samuel Towne are peaceable, law-abiding adult Connecticut citizens who meet all of the qualifications to apply for their choice of handgun certificate or pistol permit, except the age-requirements imposed by Connecticut law.

25. Plaintiffs desire and intend to exercise their constitutional right to keep and bear arms *in toto*. To keep and/or bear handguns in Connecticut, the Plaintiffs must first be able to legally acquire them.

26. To do so under the challenged federal/Connecticut regulatory scheme requires the Plaintiffs be eligible to apply first for Temporary State Pistol Permits and then for State Pistol Permits, and requires that at least one avenue of transfer, either through an FFL or private party, be able to legally transfer handguns to law-abiding adults between 18 and 20 years of age.

27. But for Connecticut's age-based restrictions for the requisite permitting, and the outright ban on the ability of adults under 21 to acquire a handgun, Plaintiffs and other similarly situated, law-abiding, young adult members of the organizational plaintiffs would acquire handguns for all lawful purposes, including self-defense in their homes, and carry them in public for self-defense.

28. The Plaintiffs bring this action under 42 U.S.C. § 1983 and 28 U.S.C. § 2201-2202 seeking declaratory and injunctive relief against the collective regime of federal law that prohibits law-abiding adult citizens between 18 and 20 years of age from obtaining handguns

from an FFL, and Connecticut laws and administrative policies that foreclose all other legal means for 18 to 20-year-olds to acquire and carry a handgun for lawful purposes.

29. The Plaintiffs likewise bring this action seeking declaratory and injunctive relief challenging the Connecticut state law establishing 21 years of age as the minimum age for eligibility to apply for either a Temporary State Pistol Permit or a State Pistol Permit, as possession thereof is the only lawful means to carry a handgun in public for self-defense in the state of Connecticut.

JURISDICTION AND VENUE

30. The Court has jurisdiction over this action under 28 U.S.C. §§ 1331, 1343, and 2201 as well as 42 U.S.C. § 1983. Venue is appropriate under 28 U.S.C. § 1391 because the plaintiffs and most of the Defendants are domiciled in Connecticut, and all of the factual events giving rise to the cause of action occurred in Connecticut.

PARTIES

Plaintiff Zachary Succow

31. Plaintiff Zachary Succow is a citizen of the United States and a resident of Seymour, Connecticut.

32. Succow is 19 years of age.

33. But for the challenged federal and Connecticut laws and policies, Succow is not prohibited from exercising his rights under the Second Amendment.

34. Except for his age, Succow meets all Connecticut requirements to apply for a Handgun Eligibility Certificate to obtain and keep a handgun for home defense.

35. Succow desires and intends to obtain a handgun for self-defense and all other lawful purposes and would do so but for fear of criminal penalty resulting from the Defendants' enforcement of the challenged laws.

36. To obtain a handgun, Succow intends to follow Connecticut's handgun permitting scheme by applying for a Eligibility Certificate, the prerequisite Temporary State Pistol Permit and then applying for a State Pistol Permit.

37. Succow desires and intends to carry a handgun in public for self-defense and all other lawful purposes and would do so but for fear of criminal penalty resulting from the Defendants' enforcement of the challenged laws.

38. Except for his age, Succow meets all Connecticut requirements to apply for a Temporary State Pistol Permit with which he would temporarily be able to lawfully carry a loaded handgun for self-defense and other lawful purposes and, except for his age, would be able to apply for a State Pistol Permit so that he could carry a loaded handgun for self-defense and other lawful purposes.

39. The challenged federal and Connecticut laws and policies, prevent Succow from applying for either a Handgun Eligibility Certificate or a Pistol Permit, and thus acquiring or carrying a handgun for self-defense, purely based on his age.

40. Succow is a member of Connecticut Citizens Defense League and the Second Amendment Foundation.

Plaintiff Samuel Towne

41. Plaintiff Samuel Towne is a citizen of the United States and a resident of Norwich, Connecticut.

42. Towne is 19 years of age.

43. Towne completed all the required training associated with obtaining a Connecticut Long Gun Eligibility Certificate. The training required to obtain a Long Gun Eligibility Certificate is the same as the training required to obtain a Handgun Eligibility Certificate, a Temporary State Pistol Permit, and a State Pistol Permit.

44. But for the challenged federal and Connecticut laws and policies, Towne is not prohibited from exercising his rights under the Second Amendment.

45. Except for his age, Towne meets all Connecticut requirements to apply for a Handgun Eligibility Certificate to obtain and keep a handgun for home defense.

46. Towne desires and intends to obtain a handgun for self-defense and all other lawful purposes and would do so but for fear of criminal penalty resulting from the Defendants' enforcement of the challenged laws.

47. To obtain such handgun, Towne intends to follow Connecticut's handgun permitting scheme by applying for a Eligibility Certificate, the prerequisite Temporary State Pistol Permit and then applying for a State Pistol Permit.

48. Towne desires and intends to carry a handgun in public for self-defense and all other lawful purposes and would do so but for fear of criminal penalty resulting from the Defendants' enforcement of the challenged laws.

49. Except for his age, Towne meets all Connecticut requirements to apply for a Temporary State Pistol Permit with which he would temporarily be able to lawfully carry a loaded handgun for self-defense and other lawful purposes and except for his age, would be

able to apply for a State Pistol Permit so that he could carry a loaded handgun for self-defense and other lawful purposes.

50. The challenged federal and Connecticut laws and policies, prevent Towne from applying for either a Handgun Eligibility Certificate or a Pistol Permit, and thus acquiring or carrying a handgun for self-defense, purely based on his age.

51. Towne is a member of Connecticut Citizens Defense League and the Second Amendment Foundation.

Plaintiff Connecticut Citizens Defense League, Inc.

52. Plaintiff, Connecticut Citizens Defense League, Inc. (“CCDL”) is a non-profit educational foundation, incorporated under the laws of Connecticut, with its principal place of business in Seymour, Connecticut. Its mission is to preserve the effectiveness of the Second Amendment through legislative and grassroots advocacy, outreach, education, research, publication, legal action, and programs focused on the constitutional right to keep and bear arms. CCDL has over 41,000 members and supporters nationwide, with more than ninety-five percent of its members and supporters being residents of Connecticut. CCDL represents its members and supporters – which include individuals seeking to exercise their right to acquire, possess, and carry firearms for personal protection. CCDL brings this action on behalf of itself, its members, supporters who possess all the indicia of membership, and similarly situated members of the public.

53. CCDL has expended and diverted resources otherwise reserved for different institutional functions and purposes, and is adversely and directly harmed by the illegal and unconstitutional actions of the Defendants as alleged herein. CCDL has diverted, and

continues to divert, significant time, money, effort, and resources to addressing the Defendants' unconstitutional enforcement of the laws complained of herein that would otherwise be used for educational outreach, public relations, and/or programmatic purposes.

54. Among other diversions and threatened diversions, the Defendants' unconstitutional enforcement of the laws complained of herein has forced, or likely will force, CCDL to divert previously allocated funds, energies, and resources to the cause of this legal action. Rather than working on other educational, outreach, public relations, and/or programmatic events and operations, CCDL's officers and Executive Board members have devoted, are continuing to devote, or are likely to devote, significant time, money, effort, and resources to addressing the Defendants' unconstitutional enforcement of the laws complained of herein. CCDL, its officers, and its Executive Board members will be forced to continue diverting such time, money, effort, and resources from CCDL's normal educational, outreach, public relations, and/or programmatic events and operations so long as the Defendants' unconstitutional enforcement of the laws complained of herein persists.

55. As to CCDL's representative capacity claims, there are common questions of law that substantially affect the rights, duties and liabilities of many of CCDL's members as well as potentially numerous similarly situated residents whose constitutional rights have been, and are continuing to be, infringed by the Defendants' unconstitutional enforcement of the laws complained of herein. The interests CCDL seeks to protect are germane to its purpose.

56. Each of the individual Plaintiffs to this action – as described in the preceding paragraphs, are all members and supporters of CCDL.

Plaintiff Second Amendment Foundation, Inc.

57. Plaintiff Second Amendment Foundation, Inc. (“SAF”) is a non-profit educational foundation incorporated under the laws of the State of Washington with its principal place of business in Bellevue, Washington. SAF seeks to preserve the effectiveness of the Second Amendment through educational and legal action programs. SAF has over 720,000 members and supporters nationwide, including many members in Connecticut.

58. The purpose of SAF includes education, research, publishing, and legal action focusing on the constitutional right to privately own and possess firearms under the Second Amendment, and the consequences of gun control. The Court’s interpretation of the Second Amendment directly impacts SAF’s organizational interests, as well as SAF’s members and supporters in Connecticut aged 18-20, who enjoy exercising their Second Amendment rights. SAF brings this action on behalf of itself, its members, supporters who possess all the indicia of membership, and similarly situated members of the public. Many of SAF’s individual Connecticut members have been adversely and directly harmed and injured by Defendants’ enforcement of the laws complained of herein.

59. The interests SAF seeks to protect are germane to its purpose. Indeed, the Connecticut statutes challenged herein have denied, and will continue to deny responsible, peaceable, law-abiding adults their fundamental, individual right to keep and bear arms enshrined under the Second and Fourteenth Amendments of the U.S. Constitution. Defendants’ actions and failures alleged herein have caused SAF to dedicate resources that would otherwise be available for other purposes to protect the rights and property of its members, supporters, and the general public, including by and through this action. Each of

the individual Plaintiffs to this action – as described in the preceding paragraphs – are members and supporters of SAF.

Defendant Pamela Jo Bondi

60. The Defendant, Pamela Jo Bondi, as Attorney General of the United States is sued in her official capacity. In her role as Attorney General, Bondi is directly responsible for enforcing federal firearms laws.

61. Bondi and her subordinates individually and collectively act to enforce the federal firearms laws complained of herein.

Defendant Ronnell Higgins

62. The Defendant, Ronnell Higgins (“Higgins”), is the Commissioner of Connecticut’s Department of Emergency Services and Public Protection (“DESPP”), and he is sued in his official capacity. In his role as the Commissioner, Higgins oversees the Connecticut State Police, which is responsible for investigating and initiating prosecutions under Connecticut law. *See* Conn. Gen. Stat. § 29-7. Additionally, DESPP possesses significant regulatory and administrative authority over Connecticut’s pistol permitting system. *See, e.g.,* Conn. Gen. Stat. § 29-28.

63. Additionally, in his role as Commissioner, Higgins exercises sole and exclusive authority over whether or not to issue Handgun Eligibility Certificates to Connecticut residents. Conn. Gen. Stat. § 29-36f.

Defendant Margaret E. Kelley

64. The Defendant, Margaret E. Kelley (“Kelley”), is Connecticut’s State’s Attorney for the Ansonia/Milford Judicial District and is sued in her official capacity. As a Connecticut

State's Attorney, she is required to "diligently inquire after and make appropriate presentment and complaint to the Superior Court of all crimes and other criminal matters within the jurisdiction of the court in which the court may proceed." Conn. Gen. Stat. § 51-286(a). Her responsibilities and authority include prosecuting individuals who violate the Connecticut laws complained of herein.

Defendant Paul J. Narducci

65. The Defendant, Paul J. Narducci ("Narducci"), is Connecticut's State's Attorney for the New London Judicial District and is sued in his official capacity. As a Connecticut State's Attorney, he is required to "diligently inquire after and make appropriate presentment and complaint to the Superior Court of all crimes and other criminal matters within the jurisdiction of the court in which the court may proceed." Conn. Gen. Stat. § 51-286(a). His responsibilities and authority include prosecuting individuals who violate the Connecticut laws complained of herein.

Defendant John Bucherati

66. The Defendant, John Bucherati ("Bucherati") is the Police Chief for the Town of Seymour and is sued in his official capacity. As the police chief of Seymour, Bucherati is responsible for approving or denying applications for Connecticut Temporary State Pistol permits in his town. Bucherati enforces the Connecticut laws that prohibit the granting of a Temporary State Pistol Permit to anyone between the ages of 18 and 20.

67. As part of the Seymour application package for a Temporary State Pistol Permit, Bucherati supplies a list of firearms prohibitors issued by the Connecticut State Police to applicants to show who is eligible. It reads in relevant part: "No person may obtain a Pistol

Permit, Eligibility Certificate, or possess any handguns if they are less than 21 years of age....”

Exhibit C – Seymour Pistol Permit Application Package, p. 6.

Defendant Patrick Daley

68. The Defendant, Patrick Daley (“Daley”) is the Police Chief for the City of Norwich and is sued in his official capacity. As the Police Chief of Norwich, Daley is responsible for approving or denying applications for Temporary State Pistol Permits in his city. Daley enforces the Connecticut laws that prohibit the granting of a Temporary State Pistol Permit to anyone between the ages of 18 and 20.

FACTUAL ALLEGATIONS

***Connecticut Firearms Laws And Connecticut Policy
Impacting Adults Under the Age Of 21***

Connecticut Law Prohibits 18 to 20-Year-Old Adults from Obtaining an Eligibility Certificate to Purchase and Keep a Handgun, Even for Home Defense.

69. To lawfully receive any handgun via transfer in Connecticut, the recipient must first possess either a state-issued Handgun Eligibility Certificate or a State Pistol Permit.

70. A Handgun Eligibility Certificate allows law-abiding citizens in Connecticut who are 21 years of age or older to purchase a handgun for home defense. The certificate does not allow the holder to carry a loaded handgun in public for personal protection. Conn. Gen. Stat. § 29-36f.

71. Conn. Gen. Stat. § 29-36f establishes the eligibility requirement that applicants must be 21 years of age or older. Conn. Gen. Stat. § 29-36f(a).

72. As a result, 18 to 20-year-olds are expressly prohibited from obtaining, or even applying for, the Handgun Eligibility Certificate that would allow them to begin to undertake the process of obtaining a handgun to keep in their homes for self-defense.

Connecticut's Two-Step Pistol Permitting Scheme Prevents 18 to 20 Year Old Adults from Acquiring and/or Carrying a Handgun

73. Conn. Gen. Stat. § 29-28(b) establishes a two-step system for the issuance of Pistol Permits.

- a. First, a person must apply to their town's chief of police, chief town executive official, or resident state trooper for a Temporary State Pistol Permit.
- b. Once a person receives that Temporary State Pistol Permit from their local municipality, they must then apply to Defendant Higgins at the Connecticut State Police for a State Pistol Permit within sixty days of receiving the Temporary State Pistol Permit.

74. Conn. Gen. Stat. § 29-33(b) prohibits any person from purchasing or receiving any handgun:

unless such person holds a valid permit to carry a pistol or revolver issued pursuant to subsection (b) of section 29-28, a valid permit to sell firearms at retail issued pursuant to subsection (a) of section 29-28 or a valid eligibility certificate for a pistol or revolver issued pursuant to section 29-36f or is a federal marshal, parole officer or peace officer.

75. A violation of Conn. Gen. Stat. § 29-33(b) is a class C felony that carries a two-year mandatory minimum sentence of incarceration and a \$5,000 fine. Conn. Gen. Stat. § 29-33(j).

76. Conn. Gen. Stat. § 29-35(a) prohibits any person from carrying a pistol or revolver – except when the person is within his house, on land leased or owned by him, or in his place of business – when the person does not hold a valid State Pistol Permit. No other Connecticut certificate or permit allows a person to carry a functional handgun in public for self-defense.

77. A violation of Conn. Gen. Stat. § 29-35(a) is a class D felony that carries a one-year mandatory minimum sentence of incarceration – absent a finding of mitigating circumstances – and the forfeiture of the firearm at issue. Conn. Gen. Stat. § 29-37(b).

78. Due to their age, the Plaintiffs are prohibited from applying to receive a State Pistol Permit.

79. Conn. Gen. Stat. § 29-28(b) provides in relevant part: “No state or temporary state permit to carry a pistol or revolver shall be issued under this subsection if the applicant... (10) is less than twenty-one years of age.”

80. Thus, Connecticut law expressly prohibits otherwise qualified, law-abiding 18 to 20-year-old adults, including the Plaintiffs, from obtaining the only Connecticut permit that would allow them to lawfully carry functional handguns in public for self-defense.

**Notwithstanding Plaintiffs’ Inability to Apply for Relevant Certificates or Permits,
Connecticut’s Transfer Ban Prevents 18 to 20 Year Olds’ Lawful Handgun
Acquisition.**

81. Even if the Plaintiffs were able to apply for and obtain a State Pistol Permit necessary to acquire (and carry) a handgun, Connecticut’s total ban on the transfer of pistols and revolvers to adult citizens under 21 years old, entirely forecloses the Plaintiffs from lawfully acquiring a handgun, much less carrying one in public for self-defense.

82. Conn. Gen. Stat. § 29-34(b) categorically prohibits anyone under the age of 21 from obtaining a pistol or revolver except in one narrow circumstance inapplicable to self-defense:

No person shall sell, barter, hire, lend, give, deliver or otherwise transfer to any person under the age of twenty-one years any pistol or revolver, except that a pistol or revolver may be temporarily transferred to any person only for the use by such person in target shooting or on a firing or shooting range, provided such use is otherwise permitted by law and is under the immediate supervision of a person eligible to possess a pistol or revolver.

83. A violation of Conn. Gen. Stat. § 29-34(b) is a class C felony that carries a two-year mandatory minimum sentence of incarceration and a \$5,000 fine. Conn. Gen. Stat. § 29-34(b).

84. These general prohibitions operate in conjunction with Connecticut's requirements for obtaining a Handgun Eligibility Certificate. Temporary State Pistol Permit, and State Pistol Permit, to completely bar Plaintiffs and all other otherwise qualified, law-abiding 18 to 20-year old adult citizens from acquiring, keeping, and carrying a functional handgun in public for self-defense.

Connecticut's Mandate That All Private Party Firearm Transfers Go Through an FFL Further Prevents Any Lawful Acquisition of Handguns by 18 to 20-Year-Old Adults.

85. In the majority of other states, non-FFL individuals may legally transfer firearms to other non-FFL individuals without the transfer being conducted through an FFL. Such transfers are referred to as "private party transfers."

86. In Connecticut, however, a policy and practice prohibiting private party transfers absent the involvement of an FFL has been enacted and is enforced by Defendant Higgins and his subordinates.

87. This policy and practice prohibiting private party transfers furthers Connecticut's regulatory scheme to collectively bar law-abiding 18 to 20-year-old adults, including the Plaintiffs, from exercising their constitutional right to acquire, keep, and carry handguns for self-defense.

88. Prior to the promulgation of Defendant Higgins' policy, private individuals could obtain the necessary paperwork from the Connecticut State Police, complete it, and request a transfer authorization number from Defendant Higgins and his subordinates. Defendant Higgins and his subordinates would then conduct a NICS check and issue a transfer authorization number approving the transfer of the firearm if no disqualifiers existed. Only then could the private parties and then transfer the firearm between themselves.

89. Per Defendant Higgins' policy and practice, private individuals (i.e., individuals who are not FFLs) must apply in writing to the Connecticut State Police (Defendant Higgins's subordinates) for permission to transfer a firearm to another private individual. Conn. Gen. Stat. § 29-33(c).

90. Connecticut law prohibits the Connecticut State Police from approving a handgun transfer between two private individuals unless and until the State Police "perform the national instant criminal background check (NICS) and make a reasonable effort to determine whether there is any reason that would prohibit such applicant from possessing a pistol or revolver...." Conn. Gen. Stat. § 29-33(c).

91. Put succinctly, Conn. Gen. Stat. § 29-33(c) requires the Connecticut State Police to use the federally-administered National Instant Check System ("NICS") background check system to process requested handgun transfers between private individuals.

92. Background check requests issued by the Connecticut State Police through the federal NICS system are processed by the Federal Bureau of Investigation (“FBI”).

93. If no disqualifying information is revealed about a prospective private party handgun purchaser upon running the NICS background check, the State Police issue “an authorization number” permitting the firearm transfer to proceed.

94. However, Defendant Higgins took the position that federal law proscribes the use of the NICS background check system for the purpose of processing a private party transfer without the involvement of an FFL.

95. On September 11, 2023, the Connecticut State Police addressed the conflict between federal and state law by simply announcing that it “will no longer facilitate the private sale of a firearm between two individuals.” **Exhibit D – Connecticut State Police Webpage.**

It explained the decision as follows:

The State statute for a firearm sale requires a query of the FBI-NICS system, which is not authorized by the FBI unless an FFL is involved. In order to satisfy the state law and the federal regulation, every private citizen sale to another private person must be facilitated through an FFL.

Id.

96. Therefore, per Defendant Higgins’ policy, the background checks mandated by Connecticut law for private party transfers, as codified in Conn. Gen. Stat. § 29-33(c), cannot be conducted under federal law absent the involvement of an FFL, and any requests for such background checks will not be processed by the FBI.

97. Thus, collectively, these state statutes (hereinafter, “the Connecticut handgun ban”) and Defendant Higgins’ 2023 policy of requiring all private party transfers be conducted

by an FFL, categorically ban any adult under the age of twenty-one in Connecticut from lawfully obtaining a handgun, keeping them, or bearing them for lawful purposes.

98. Indeed, *even if* peaceable, non-prohibited 18-20 year old adults in Connecticut could receive a Handgun Eligibility Certificate, a Temporary State Pistol Permit, and/or a State Pistol Permit, and *even if* Connecticut's outright transfer ban for 18 to 20 year old adults pursuant to Conn. Gen. Stat. § 29-34(b) were enjoined, Conn. Gen. Stat. § 29-33(c) and Defendant Higgins' 2023 policy completely forecloses any possibility for 18 to 20 year old adults to lawfully acquire a handgun in Connecticut due to federal law as explained *infra*.

99. Plaintiffs' Second Amendment rights guarantee them the right to acquire a handgun. Hard stop. It is no answer that the federal government forecloses one avenue of acquisition and the state of Connecticut forecloses all remaining avenues.

100. While the state and federal Defendants may point fingers at each other, it is the interaction of the challenged state and federal laws, along with Defendant Higgins' policy, in untraversable combination, that unconstitutionally prevent the Plaintiffs from exercising their Second Amendment rights.

Federal Firearms Laws Impacting Adults Under the Age Of 21

101. Under federal law, no FFL is permitted to transfer a handgun to any person who is less than 21 years old. 18 U.S.C. § 922(b)(1) declares:

It shall be unlawful for any licensed importer, licensed manufacturer, licensed dealer, or licensed collector to sell or deliver-- (1) any firearm or ammunition to any individual who the licensee knows or has reasonable cause to believe is less than eighteen years of age, and, if the firearm, or ammunition is other than a shotgun or rifle, or ammunition for a shotgun or rifle, to any individual who the licensee knows or has reasonable cause to believe is less than twenty-one years of age....

See also **Exhibit A – Minimum Age for Gun Sales and Transfers** (Handguns: Under federal law, FFLs may not sell, deliver or otherwise transfer a handgun or handgun ammunition to any person the transferor knows or has reasonable cause to believe is under the age of 21.”).

102. If an FFL violates this provision, they "shall be fined under this title, imprisoned not more than five years, or both." 18 U.S.C. §924(a)(1)(D).

103. Notably, 18 U.S.C. § 922(b)(1) does *not* foreclose all avenues of acquisition of a handgun by an individual 18 to 20 years of age.

104. Additional guidance from the federal Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) confirms this information:

An individual between 18 and 21 years of age may acquire a handgun from an unlicensed individual who resides in the same state, provided the person acquiring the handgun is not otherwise prohibited from receiving or possessing firearms under federal law. A federal firearms licensee may not, however, sell or deliver a firearm other than a shotgun or rifle to a person the licensee knows or has reasonable cause to believe is under 21 years of age.

There may be state or local laws or regulations that govern this type of transaction. Contact the office of your State Attorney General for information on any such requirements.

Exhibit B – ATF Q&A On Handgun Acquisition.

105. 27 C.F.R. § 478.99(b)(1) similarly declares, in relevant part:

A licensed importer, licensed manufacturer, licensed dealer, or licensed collector shall not sell or deliver (1) any firearm or ammunition to any individual who the importer, manufacturer, dealer, or collector knows or has reasonable cause to believe is less than 18 years of age, and, if the firearm, or ammunition, is other than a shotgun or rifle, or ammunition for a shotgun or rifle, to any individual who the importer, manufacturer, dealer, or collector knows or has reasonable cause to believe is less than 21 years of age....

106. Collectively, these federal statutes and regulations (hereinafter, “the federal handgun ban”) categorically ban any adult under the age of twenty-one from purchasing or

receiving a handgun from an FFL, but allow such individuals to purchase or receive a handgun and ammunition by way of a private party transfer.

107. The federal handgun ban, therefore, leaves open a but a tiny window of opportunity for 18 to 20 year old adults to lawfully acquire handguns – a window unconstitutionally slammed shut in Connecticut by the interaction of the federal handgun ban, the Connecticut handgun ban, and Defendant Higgins’ policy.

Federal Regulations Pertaining to NICS Background Checks

108. 28 C.F.R. § 25.6 describes who may access NICS and for what purposes. In the relevant part, the regulation states:

(j) ***Access to the NICS Index for purposes unrelated to NICS background checks required by the Brady Act.*** Access to the NICS Index for purposes unrelated to NICS background checks pursuant to 18 U.S.C. 922(t) shall be limited to uses for the purposes of:

(1) Providing information to Federal, state, tribal, or local criminal justice agencies in connection with the issuance of a firearm-related or explosives-related permit or license, including permits or licenses to possess, acquire, or transfer a firearm, or to carry a concealed firearm, or to import, manufacture, deal in, or purchase explosives;

(2) Responding to an inquiry from the Bureau of Alcohol, Tobacco, Firearms, and Explosives in connection with a civil or criminal law enforcement activity relating to the Gun Control Act (18 U.S.C. Chapter 44) or the National Firearms Act (26 U.S.C. Chapter 53); or,

(3) Disposing of firearms in the possession of a Federal, state, tribal, or local criminal justice agency.

(emphasis original).

The Second Amendment

109. The Second Amendment to the United States Constitution provides: “A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms shall not be infringed.”

110. The Second Amendment guarantees individuals a fundamental right to keep and carry arms for self-defense and defense of others in the event of a violent confrontation. *Heller*, 554 U.S. 570; *McDonald*, 561 U.S. 742; *Caetano v. Massachusetts*, 577 U.S. 1027 (2016); *Bruen*, 597 U.S. 1, 142 S. Ct. 2111.

111. The Second Amendment is applicable to the States as incorporated through the Due Process Clause of Fourteenth Amendment because the right to “keep and bear Arms” is a fundamental constitutional right essential to ordered liberty. *McDonald*, 561 U.S. at 778.

112. The Supreme Court has defined all of the Second Amendment’s key terms. “The people” means, at a minimum, “all Americans” and “Arms” includes “all instruments that constitute bearable arms”. *Heller*, 554 U.S. at 580–82.

113. “We turn to the phrases ‘keep arms’ and ‘bear arms’. Johnson defined ‘keep’ as, most relevantly, ‘[t]o retain; not to lose,’ and ‘[t]o have in custody.’ Johnson 1095. Webster defined it as ‘[t]o hold; to retain in one’s power or possession.’ No party has apprised us of an idiomatic meaning of “keep Arms.” Thus, the most natural reading of ‘keep Arms’ in the Second Amendment is to ‘have weapons.’” *Heller*, 554 U.S. at 582.

114. “[T]he core Second Amendment right to keep and bear arms for self-defense ‘wouldn’t mean much’ without the ability to acquire arms.” *Teixeira v. Cty. of Alameda*, 873 F.3d 670, 677 (9th Cir. 2017). For this reason, the right to keep and bear arms includes the right to purchase them. And thus, laws that burden the ability to purchase arms burden Second

Amendment rights. *Jones v. Bonta*, 34 F.4th 704, 716 (9th Cir. 2022), opinion vacated on reh'g, 47 F.4th 1124 (9th Cir. 2022).

115. In *Bruen*, the Supreme Court held unconstitutional New York's "good cause" licensing requirement because a State may not condition the right to publicly carry handguns on a citizen's "special need for self-defense." *Bruen*, 142 S.Ct. at 2135 n.8.

116. The "general right to public carry" cannot be restricted absent "exceptional circumstances." *Bruen*, 142 S. Ct. at 2156. This is because the Second Amendment "presumptively protects" carrying firearms. *Id.* at 2129.

117. To determine whether a state's restriction is constitutional, *Bruen* explained that "the standard for applying the Second Amendment is as follows: When the Second Amendment's plain text covers an individual's conduct, the Constitution presumptively protects that conduct. The government must then justify its regulation by demonstrating that it is consistent with the Nation's historical tradition of firearm regulation." 142 S. Ct. at 2129.

118. It is the Defendants' burden to "affirmatively prove that its firearms regulation is part of the historical tradition that delimits the outer bounds of the right to keep and bear arms." *Id.* at 2127; *see also id.* at 2150 ("[W]e are not obliged to sift the historical materials for evidence to sustain New York's statute. That is respondents' burden."). If the Defendants fail to meet their burden, then the Defendants' restrictions must be enjoined.

119. *Bruen* struck down as unconstitutional New York's "proper cause" requirement for issuance of a permit to carry a handgun in public. In doing so, *Bruen* explicitly rejected New York's attempt to justify its restriction as analogous to a historical "sensitive place" regulation. 142 S.Ct. at 2133-34. The Court explained that a state may not simply ban guns wherever

people may “congregate” or assemble. A rule that “expand[ed] the category of ‘sensitive places’ simply to all places of public congregation that are not isolated from law enforcement defines the category of ‘sensitive places’ far too broadly.” *Id.* at 2134. As the Court explained, “[p]ut simply, there is no historical basis for New York to effectively declare the island of Manhattan a ‘sensitive place’ simply because it is crowded and protected generally by the New York City Police Department.” *Id.*

120. “18-to-20-year-olds are, like other subsets of the American public, presumptively among “the people” to whom Second Amendment rights extend.” *Lara v. Commr. Pennsylvania State Police*, 91 F.4th 122, 132 (3d Cir. 2024); “Ordinary, law-abiding 18 to 20-year-old Minnesotans are unambiguously members of the people.” *Worth v. Jacobson*, 108 F.4th 677 (8th Cir. 2024) at 692, reh’g denied, *Worth v. Jacobson*, 2024 WL 3892865, (C.A.8 (Minn.), 2024). “[T]he Court concludes that law-abiding 18-to-20-year-olds are a part of “the people” referenced in the Second Amendment.” *Firearms Policy Coalition, Inc. v. McCraw*, 623 F. Supp. 3d 740, 748 (N.D. Tex. 2022), appeal dismissed sub nom. *Andrews v. McCraw*, No. 22-10898, 2022 WL 19730492 (5th Cir. Dec. 21, 2022); “We agree with Plaintiffs: the historical record shows that the Second Amendment protects young adults' right to keep and bear arms.” *Jones v. Bonta*, 34 F.4th 704, 720 (9th Cir. 2022), opinion vacated on reh'g, 47 F.4th 1124 (9th Cir. 2022). “[T]he Constitution's text, structure, and history affirmatively prove that 18-yearolds are covered by the Second Amendment.” *Hirschfeld v. Bureau of Alcohol, Firearms, Tobacco & Explosives*, 5 F.4th 407, 440 (4th Cir. 2021), as amended (July 15, 2021), vacated as moot, 14 F.4th 322 (4th Cir. 2021).

121. Since *Bruen*, a trial court recently found that the federal law restricting the sale of handguns to adults under 21 is unconstitutional. "In summary, because Plaintiffs' conduct – the purchase of handguns – “fall[s] [within] the Second Amendment's ‘unqualified command’ ” and the challenged statutes and regulations are not “consistent with the Nation's historic tradition of firearm regulation,” the Court FINDS 18 U.S.C. §§ 922(b)(1) and (c)(1) facially unconstitutional and as applied to Plaintiffs. Plaintiffs having demonstrated there is no genuine dispute of material fact and that they are entitled to judgment as a matter of law, their Motion for Summary Judgment [ECF No. 28] is GRANTED. For the same reasons," *Brown v. Bureau of Alcohol, Tobacco, Firearms & Explosives*, 704 F. Supp. 3d 687, 706 (N.D.W. Va. 2023), appeal pending, 4th Cir.

122. The 5th Circuit also recently reversed a trial court, finding that the federal law restricting the sale of handguns to adults under 21 was unconstitutional. “In sum, 18 U.S.C. §§ 922(b)(1), (c)(1) and their attendant regulations are unconstitutional in light of our Nation's historic tradition of firearm regulation.” *Reese v. Bureau of Alcohol*, 2025 U.S. App. LEXIS 2142, *36 (5th Cir. 2025).

123. When examining a challenged law, the court must consider the relevant time period and the court must look to relevantly similar historical analogues that also explain the how and why and keep in mind that our forefathers would have never have accepted certain legislation. Some legislation would have never been accepted and thus is off the table for consideration. The Founding Fathers framed a limited government, and vastly expanded the right to keep and bear arms in America. Laws of the time did not control people nor arms, but sought to, as today, punish criminal acts and only act in a prophylactic manner under very

limited circumstances. So, there were laws prohibiting intoxicated carrying of arms and the temporary disarmament of those adjudicated to be insane and thus dangerous. At the time of the Founding and in 1791, ordinary adults under 21 had all the rights of any other adult otherwise.

124. The relevant time period to examine to determine if there are any relevantly similar analogues that limit Second Amendment rights in the same way is 1791. See *Lara v. Comm'r Pennsylvania State Police*, 91 F.4th 122, 134 (3d Cir. 2024), cert. granted, judgment vacated sub nom. *Paris v. Lara*, No. 24-93, 2024 WL 4486348 (U.S. Oct. 15, 2024) (Footnotes omitted) (“the Second Amendment should be understood according to its public meaning in 1791.”). See also, *United States v. Connelly*, --- F.4th ----, 2024 WL 3963874 at *9 (5th Cir. Aug. 28, 2024) (“Offering three laws passed scores of years post-Ratification (and a fourth passed nearly half a century beyond that) misses the mark by a wide margin.”). See also Mark Smith, *Attention Originalists: The Second Amendment Was Adopted In 1791, Not 1868*, 24 Harvard J.L. & Pub. Pol’y Per Curiam 31 (2022) (“No Supreme Court case has ever looked to 1868 as the principal period for determining the meaning of an individual right in the Bill of Rights. If periods after 1791 are consulted at all, it is only to confirm that subsequent authorities, generally very shortly after the Founding, remained consistent with the public understanding in 1791.”).

125. 10 U.S.C. §505(a) allows adults age 18 to join the United States military, and to join at age 17 with parental consent. See 10 U.S.C. §505(a) which reads- (a) The Secretary concerned may accept original enlistments in the Regular Army, Regular Navy, Regular Air Force, Regular Marine Corps, Regular Space Force, or Regular Coast Guard, as the case may be, of qualified, effective, and able-bodied persons who are not less than seventeen years of

age nor more than forty-two years of age. However, no person under eighteen years of age may be originally enlisted without the written consent of his parent or guardian, if he has a parent or guardian entitled to his custody and control. Thus, adults under 21 may join the military.

126. The Twenty-sixth Amendment to the United States Constitution provides, in pertinent part - The right of citizens of the United States, who are eighteen years of age or older, to vote shall not be denied or abridged by the United States or by any State on account of age. Thus, adults under 21 can vote.

127. *Bruen* further establishes several requirements to determine whether a historical regulation is sufficiently analogous. First, the relevant time period for the historical analogue must be the Founding, centering on 1791. *Bruen*, 142 S.Ct. at 2135-36. That is because “[c]onstitutional rights are enshrined with the scope they were understood to have when the people adopted them.” *Bruen*, 142 S.Ct. at 2136 (cleaned up). “20th century and late 19th century statutes and regulations “cannot provide much insight into the meaning of the Second Amendment when it contradicts earlier evidence.” *Bruen*, 142 S.Ct. at 2154 & n.28.

128. Thus, restrictions on the right to keep and bear arms dating after the Civil War and after the adoption of the Fourteenth Amendment in 1868 may be confirmatory of earlier legislation but cannot be used alone to provide the appropriate historical analogue required by *Bruen*. Legislation, history and events following the Civil war can confirm but cannot limit, reduce or infringe upon the rights as understood in 1791. In other words, only those restrictions with roots at the time of the Founding are sufficiently “enduring” and “well-

established” to comport with the Second Amendment’s “unqualified command.” *Id.* at 2126 (quoting *Konigsberg v. State Bar of Cal.*, 366 U.S. 36, 50 n.10 (1961)).

129. Second, the historical analogue must be “representative.” Historical “outlier” requirements of a few jurisdictions or of the Territories are to be disregarded. *Bruen*, 142 S.Ct. at 2133, 2153, 2147 n.22 & 2156. Courts should not “uphold every modern law that remotely resembles a historical analogue,” because doing so “risk[s] endorsing outliers that our ancestors would never have accepted.” *Drummond v. Robinson*, 9 f.4th 217 (3rd. Cir 2021),- individual self-defense is the central component of the Second Amendment right.

130. Also, the historical analogue must be “relevantly similar,” which is to say that it must burden ordinary, law-abiding citizens right to carry in a similar manner and for similar reasons. *Bruen*, 142 S. Ct. at 2132. *Bruen* thus held that the inquiry into whether a proper analogue exists is controlled by two “metrics” of “how and why” any restriction was historically imposed during the Founding era. *Id.* at 2133. “[W]hether modern and historical regulations impose a comparable burden on the right of armed self-defense and whether that burden is comparably justified are central considerations when engaging in an analogical inquiry.” *Id.* (cleaned up). “[T]o the extent later history contradicts what the text says, the text controls.” *Id.* at 2137. “Thus, ‘postratification adoption or acceptance of laws that are inconsistent with the original meaning of the constitutional text obviously cannot overcome or alter that text.’” *Id.* (quoting *Heller v. District of Columbia*, 670 F.3d 1224, 1274, n.6 (Kavanaugh, J., dissenting)).

131. Also, the historical analysis required by the Supreme Court is fundamentally a legal inquiry that examines legal history, which is appropriately presented in briefs. See *Bruen*,

142 S. Ct. at 2130 n.6 (noting that the historical inquiry presents “legal questions” that judges can address) (emphasis in original); *see also id.* at 2135 n.8 (rejecting the dissent’s suggestion that further fact-finding was needed and holding that its ruling did not “depend on any of the factual issues raised by the dissent”). Accordingly, the required analysis does not require fact-finding by a court.

132. The text of the Second Amendment, as authoritatively interpreted by the Supreme Court, indisputably covers possession (keep) and the wear, carry, and transport (bear) of firearms, including handguns by ordinary, law-abiding citizens. The Government bears the burden to demonstrate that there is an enduring, well established, representative historical analogue to the restriction imposed by the government. And the historical analogue must be “relevantly similar” to the contemporary restriction imposed by the government, burdening the Second Amendment right in a similar manner and for similar reasons. Under this test established in *Bruen*, Defendants cannot meet their collective burden to justify their the prohibition on the purchase, acquisition, or possession of handguns for those who are the age of eighteen but under the age of twenty-one, nor can State Defendants meet their burden on the prohibition of those same plaintiffs from carrying a handgun in public for their self-defense. 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.

**COUNT ONE – 42 U.S.C. § 1983 CLAIM FOR VIOLATION OF THE SECOND
AND FOURTEENTH AMENDMENT AGAINST ALL DEFENDANTS
EXCEPT PAMELA JO BONDI**

133. Paragraphs 1 through 132 are hereby incorporated herein.

134. The Second Amendment guarantees an individual right to keep and bear arms.

135. The Second Amendment is incorporated into the Fourteenth Amendment, allowing Second Amendment violation claims to be brought against state and local actors. *McDonald*, 561 U.S. 742.

136. The Second Amendment's guarantee is especially true when it comes to handguns, which the Supreme Court explicitly recognized as "the quintessential self-defense weapon." *Heller*, 554 U.S. at 629.

137. The Second Amendment unequivocally guarantees an individual right to acquire, keep, and carry arms for self-defense and all other lawful purposes.

138. The Connecticut handgun ban and the Defendants' enforcement of it impermissibly infringes upon the right of all law-abiding individuals aged 18 to 20 to keep and bear arms by making it virtually impossible for them to lawfully acquire handguns and handgun ammunition.

139. American history and tradition confirm that all law-abiding adults, including those under the age of twenty-one, were members of "the people" who were understood to enjoy full Second Amendment rights in the Founding Era.

140. Over 200 colonial and Founding-era militia statutes throughout the seventeenth and eighteenth centuries not only permitted, but also *mandated* that persons aged eighteen to twenty acquire and keep arms to perform their duty to serve in the militia and otherwise protect their communities. *See generally* David Kopel & Joseph Greenlee, *The Second Amendment Rights of Young Adults*, 43 S. Ill. U. L.J. 495 (2019) (providing over 200 militia statutes).

141. No colonial or Founding Era law restricted the right of law-abiding adults under the age of twenty-one to acquire or possess arms purely based on age.

142. There is and never has been any constitutionally grounded basis for restricting the Second Amendment rights of law-abiding adults between the ages of eighteen and twenty.

143. Thus, the statutory and regulatory provisions that comprise the Connecticut handgun ban are unconstitutional on their face and as-applied to the law-abiding Plaintiffs in this case.

**COUNT TWO – CLAIM FOR VIOLATION OF THE SECOND AMENDMENT
AGAINST DEFENDANT PAMELA JO BONDI**

144. Paragraphs 1 through 132 are hereby incorporated herein.

145. The Second Amendment guarantees an individual right to acquire, keep and bear arms.

146. This is especially true when it comes to handguns, which the Supreme Court explicitly recognized as “the quintessential self-defense weapon.” *District of Columbia v. Heller*, 554 U.S. 570, 629 (2008).

147. The federal handgun ban and Defendant Bondi’s enforcement of it impermissibly infringes upon the right of all law-abiding adults aged 18 to 20, including the Plaintiffs to keep and bear arms by foreclosing the primary method of acquiring a handgun – commercial purchase – which results in a total a total ban on the ability to acquire handguns and handgun ammunition when enforced in combination with Connecticut state law.

148. American history and tradition confirm that all peaceable law-abiding adults, including those under the age of twenty-one, were members of “the people” understood to enjoy full Second Amendment rights in the Founding Era.

149. Over 200 colonial and Founding-era militia statutes throughout the seventeenth and eighteenth centuries not only permitted, but affirmatively mandated that persons aged eighteen to twenty acquire and keep arms. *See generally* David Kopel & Joseph Greenlee, *The Second Amendment Rights of Young Adults*, 43 S. Ill. U. L.J. 495 (2019) (providing over 200 militia statutes).

150. No colonial or Founding Era law restricted the right of peaceable law-abiding adults under the age of twenty-one to acquire arms purely based on age.

151. There is and never has been any constitutionally grounded basis for restricting the Second Amendment rights of peaceable law-abiding adults between the ages of eighteen and twenty.

152. Thus, the statutory and regulatory provisions that comprise the federal handgun ban are unconstitutional on their face and as-applied to the Plaintiffs and other similarly situated Connecticut residents who are foreclosed from any other avenue to acquire a handgun by function of state law, policy and practice.

PRAYER FOR RELIEF

Wherefore, the Plaintiffs respectfully request the following relief:

- A) A declaratory judgment that the provisions of Conn. Gen. Stat. § 29-28(b) Conn. Gen. Stat. § 29-34(b), Conn. Gen. Stat. § 29-34(b), and Conn. Gen. Stat. § 29-36f that operate to prohibit individuals between 18 years of age and 20 years of age from acquiring handguns and handgun ammunition are unconstitutional on their face and as applied to the Plaintiffs;

- B) A permanent injunction enjoining all of the Defendants (except Defendant Bondi), their officers, agents, servants, employees, and all persons in active concert or participation with them and all who have notice of the injunction from enforcing the provisions of Conn. Gen. Stat. § 29-28(b), Conn. Gen. Stat. § 29-34(b), Conn. Gen. Stat. § 29-34(b), and Conn. Gen. Stat. § 29-36f that operate to prohibit individuals between 18 years of age and 20 years of age from acquiring handguns and handgun ammunition;
- C) A declaratory judgment that the provisions of 18 U.S.C. § 922(b)(1), 18 U.S.C. § 924(a)(1)(D), 18 U.S.C. § 922(c), 27 C.F.R. § 478.99(b)(1) that operate to prohibit individuals between 18 years of age and 20 years of age from acquiring handguns and handgun ammunition are unconstitutional on their face and as applied to the Plaintiffs;
- D) A permanent injunction enjoining Defendant Bondi, her officers, agents, servants, employees, and all persons in active concert or participation with them and all who have notice of the injunction from enforcing the provisions of 18 U.S.C. § 922(b)(1), 18 U.S.C. § 924(a)(1)(D), 18 U.S.C. § 922(c), 27 C.F.R. § 478.99(b)(1) that operate to prohibit individuals between 18 years of age and 20 years of age from acquiring handguns and handgun ammunition;
- E) In the alternative only to the relief requested in paragraphs C and D *supra*, a declaratory judgment and a permanent injunction enjoining Defendant Bondi and her officers, agents, servants, employees, and all persons in active concert or participation with them and all who have notice of the injunction from prohibiting

the State of Connecticut and the Connecticut state police from using the National Instant Check System (“NICS”) for private party handgun transfers to eligible persons 18 to 20 years of age; and enjoining the remaining Defendants and their officers, agents, servants, employees, and all persons in active concert or participation with them and all who have notice of the injunction, from declining to approve private party handgun transfers to eligible persons 18 to 20 years-old due to their age, or for any claimed lack of access to the NICS system;

F) Attorneys’ fees;

G) Costs;

H) Any such further relief that the Court deems just and equitable.

Dated: May 18, 2025

Respectfully submitted,

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Attorneys for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's system.

/s/ Cameron L. Atkinson

Exhibit A

Minimum Age for Gun Sales and Transfers*

Minimum Age for Gun Sales and Transfers*

Unlicensed Persons:

- Handguns: Under federal law, unlicensed persons may not sell, deliver or otherwise transfer a handgun or handgun ammunition to any person the transferor knows or has reasonable cause to believe is under age 18, except under certain exceptions.**
- Long Guns (Rifles/ Shotguns): There are no federal laws preventing unlicensed persons from selling, delivering, or otherwise transferring a long gun or long gun ammunition to a person of any age.

Federal Firearms Licensees (FFLs):

- Handguns: Under federal law, FFLs may not sell, deliver, or otherwise transfer any firearm or ammunition to any individual who the licensee knows or has reasonable cause to believe is under the age of 21.
- Long Guns (Rifles/ Shotguns): Under federal law, FFLs may not sell, deliver, or otherwise transfer a long gun, or long gun ammunition to any person the licensee knows or has reasonable cause to believe is under the age of 18.

* Source: 18 U.S.C. 922

** See: 18 U.S.C. 922 (x)

ATF PROTECTING THE PUBLIC
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Published By ATF on June 21, 2016

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Minimum Age for Gun Sales and Transfers*

Unlicensed Persons

- Handguns: Under federal law, unlicensed persons may not sell, deliver or otherwise transfer a handgun or handgun ammunition to any person the transferor knows or has reasonable cause to believe is under the age of 18, except under certain exceptions.**

- Long Guns: There are no federal laws preventing unlicensed persons from selling, delivering or otherwise transferring a long gun or long gun ammunition to a person of any age.

Federal Firearms Licensees (FFLs):

- Handguns: Under federal law, FFLs may not sell, deliver or otherwise transfer a handgun or handgun ammunition to any person the transferor knows or has reasonable cause to believe is under the age of 21.
- Long Guns: Under federal law, FFLs may not sell, deliver or otherwise transfer a long gun or long gun ammunition to any person the transferor knows or has reasonable cause to believe is under the age of 18.

*18 USC 922

**18 USC 922 (x)

Published by ATF on June 21, 2016

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Last Reviewed October 28, 2020

Exhibit B

May an individual between the ages of 18 and 21 years of age acquire a handgun from an unlicensed individual who is also a resident of that same state?

An individual between 18 and 21 years of age may acquire a handgun from an unlicensed individual who resides in the same state, provided the person acquiring the handgun is not otherwise prohibited from receiving or possessing firearms under federal law. A federal firearms licensee may not, however, sell or deliver a firearm other than a shotgun or rifle to a person the licensee knows or has reasonable cause to believe is under 21 years of age.

There may be state or local laws or regulations that govern this type of transaction. Contact the office of your State Attorney General for information on any such requirements.

[18 U.S.C. 922(b)(1)]

Last Reviewed April 12, 2022

Exhibit C



SEYMOUR POLICE DEPARTMENT

Detective Division



11 Franklin Street Seymour, CT 06483-2891
203-881-7638 or SPDDetectives@seymourct.org

Temporary Pistol Permit Application Packet

Follow the Instructions Carefully

1. You must be a resident of the Town of Seymour
2. **Complete the entire Temporary Pistol Permit Application.**
3. Schedule an appointment with the Seymour Police Detective Division by phone at 203-881-7638 or e-mail at SPDDetectives@seymourct.org. Do not show up at the Seymour Police Department prior to the scheduled appointment.
4. When the scheduled appointment had been confirmed the applicant should bring the items listed below:
 - A. Valid State of Connecticut Driver's License or I.D. Card
 - B. Official Birth Certificate or Current Passport
 - C. Current and Valid NRA Certificate "Basic Pistol Course" that meets the State of Connecticut statute requirements.
 - D. Self-addressed stamped envelope (Letter size 9.5 by 4.25)
 - E. Bank Check or Money Order paid to the order of "Seymour Police Department with the sum of \$75.00. *(Personal Checks are NOT accepted)*. Note: Other State of Connecticut processing fees will be applied at pre-enrollment online.
5. Pre-Fingerprint enrollment must be completed online with the State of Connecticut prior to the appointment with the Seymour Detective appointment at the following website <https://ct.flexcheck.us.idemia.io/CCHRSPreEnroll/>
 - A. Enter the following 8 digits on the pre-enrollment webpage **AD6B-6295** then click the submit button.
 - B. Follow the website instructions and complete all the fields. Mandatory fields are marked in Blue, Bold, and with an *. When completed click on the button "Submit Pre-Enrollment Button". Upon Submission there will be a on-line processing fee assessed of \$88.25 to you.
 - C. Upon completion a "Applicant Tracking Number" will be generated. You will need to print the tracking number and the "Pre-Enrollment Confirmation" to be electronically fingerprinted at the Seymour Police Department.
6. If the above-listed instructions are not completed you will be turned away.

IMPORTANT: The LAST PAGE of the State of Connecticut DPS-299-C Pistol Permit Application MUST BE NOTARIZED prior to submitting the Pistol Permit Packet

Note: Seymour Residents can only be fingerprinted in Seymour.

STATE OF CONNECTICUT
DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
DIVISION OF STATE POLICE



Special Licensing and Firearms Unit

PISTOL PERMIT/ELIGIBILITY CERTIFICATE APPLICATION

(Pursuant to C.G.S. §§ 29-28 et. seq., 29-36 et. seq., and 53a-217 et. seq.)

Before completing this application, it is suggested that you review the Connecticut General Statutes pertaining to firearms. These can be accessed on the Internet at www.cga.ct.gov, or through your local library.

Type of Permit Requested:

Check Box:

- ☐ 60 Day Temporary State Pistol Permit
☐ Non-Resident State Pistol Permit
☐ Eligibility Certificate to Purchase Pistols or Revolvers
☐ Eligibility Certificate to Purchase Long Guns

Instructions:

Instructions for State Pistol Permits:	Instructions for Non-Resident State Pistol Permits:	Instructions for Eligibility Certificates to Purchase Pistols or Revolvers and/or Eligibility Certificates to Purchase Long Guns:
<p>1. Complete this form (DPS-799-C) and submit to appropriate local authority (local police, resident state trooper or first select person, as applicable) along with all of the following:</p> <ul style="list-style-type: none"> Firearms Safety & Use Course Certificate; \$70.00 fee, payable to the local authority; and Proof you are legally and lawfully in the United States (e.g., certified copy of birth certificate, U.S. passport or documentation issued by I.C.E.). <p>2. Fingerprints are required to process this application. Please contact your local law enforcement agency for further direction on the process for obtaining fingerprints.</p> <p>3. Upon approval, the local authority will issue a Temporary State Permit to Carry Pistols and Revolvers (DPS-11-C), effective for 60 days.</p> <p>4. Within the 60 day period, go to a DESPP, Division of State Police, pistol permit location and submit the following:</p> <ul style="list-style-type: none"> The Temporary State Permit to Carry Pistols and Revolvers (DPS-11-C) issued by the local authority; A completed Application for State Permit to Carry Pistols and Revolvers (DPS-46-C); \$70.00 fee, payable to Treasurer, State of Connecticut; Proof you are legally and lawfully in the United States (e.g., certified copy of birth certificate, U.S. passport or documentation issued by I.C.E.); and Proof of valid state issued photo identification card. <p>5. Upon approval, <i>your photograph will be taken at DESPP and you will be issued a state pistol permit.</i></p>	<p style="text-align: center;">**EMAIL DESPP FOR PACKET** <u>SLFU.OOS@CT.GOV</u></p> <p><i>You must hold a valid permit or license to carry a pistol or revolver issued by a recognized United States jurisdiction.</i></p>	<p style="text-align: center;">**EMAIL DESPP FOR PACKET** <u>SLFU.OOS@CT.GOV</u></p> <p><i>You must be 21 years of age to obtain a Pistol Eligibility Certificate. You must be 18 years of age to obtain a Long Gun Eligibility Certificate.</i></p>

For Department of Emergency Services and Public Protection (DESPP), Division of State Police, pistol permit locations, access www.ct.gov/despp and follow the link to the Special Licensing and Firearms Unit or call (860) 685-8290. Note: All payments must be made with separate checks.

DIVISION OF STATE POLICE

Contact / Identifying Information:

Name of Applicant											
Last										Suffix	
First										Middle Initial	
Provide all other names by which you have been known (Maiden name, Aliases, Nicknames, etc.) (Attach additional sheet(s), if necessary)											
Date of Birth ____/____/____ Month/Day/Year				Sex <input type="checkbox"/> F <input type="checkbox"/> M <input type="checkbox"/> Unknown/Non-binary		Height ____ Ft. ____ In.		Weight ____ Lbs.		Eye Color <input type="checkbox"/> Brown <input type="checkbox"/> Blue <input type="checkbox"/> Black <input type="checkbox"/> Green <input type="checkbox"/> Gray <input type="checkbox"/> Hazel	
Race <input type="checkbox"/> White <input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Unknown/Other								Hair Color <input type="checkbox"/> Brown <input type="checkbox"/> Black <input type="checkbox"/> Blonde <input type="checkbox"/> Red <input type="checkbox"/> Gray <input type="checkbox"/> White <input type="checkbox"/> Bald			
Place of Birth _____, ____ State								Social Security Number (Optional, but will help prevent misidentification) ____-____-_____			
Country of Citizenship _____						Alien Reg. Number (If applicable) _____					
Residential Address (List street address. Post office box numbers are not acceptable) _____ Number/Street _____, ____ State _____ Zip Code City/Town											
List Residential Addresses for the Last 7 Years (Attach additional sheet(s), if necessary) <i>*Any subsequent changes of address must be reported within 48 hours to the Special Licensing and Firearms Unit</i> 1. _____ 2. _____											
Mailing Address (If different from current residential address above) _____ Number/Street _____, ____ State _____ Zip Code City/Town											
Home Telephone Number (____) ____-____ Area Code				Motor Vehicle Operator's License Number _____ State of Issue							
Alternate Telephone Number (____) ____-____ Area Code				Email Address _____							
Employment History:											
List Employers and Occupation for the Last 7 Years (Provide employer's name, address and telephone number) (Attach additional sheet(s), if necessary) 1. _____ / Occupation: 2. _____ / Occupation:											
Permit or Eligibility Certificate History:											
Have you had a firearms permit, permit application or eligibility certificate of any kind from ANY jurisdiction in the United States denied, suspended or revoked? <input type="checkbox"/> NO <input type="checkbox"/> YES If "YES," provide: 1. Identify the jurisdiction which issued the denial, suspension or revocation: _____ 2. Date of denial, suspension or revocation: _____ 3. The reason for the denial, suspension, or revocation: _____											

**STATE OF CONNECTICUT
DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
DIVISION OF STATE POLICE**

Medical History:

Have you been confined in a hospital for mental illness in the past sixty (60) months by order of a Probate Court?

☐ NO ☐ YES If "YES," explain: (Attach additional sheet(s), if necessary)

Have you been discharged from custody within the past twenty years after having been found not guilty of a crime by reason of a mental disease or defect? ☐ NO ☐ YES

If "YES," explain: (Attach additional sheet(s), if necessary)

Have you been voluntarily admitted to a hospital for mental illness within the past six (6) months for reasons other than solely for alcohol or drug dependence? ☐ NO ☐ YES

If "YES," explain: (Attach additional sheet(s), if necessary)

Notice: DESPP herein notifies the applicant that, pursuant to C.G.S. §§ 29-28 through 29-38b, DESPP will be notified by the Department of Mental Health and Addiction Services if the applicant has been confined to a hospital for psychiatric disabilities within the preceding sixty (60) months by order of Probate Court, or if the applicant has been voluntarily admitted to a hospital for mental illness within the past six (6) months for reasons other than solely for alcohol or drug dependence.

Criminal History:

Have you ever been ARRESTED for any crime, in any jurisdiction? ☐ NO ☐ YES If "YES," list all arrests, indicating charges, locations, dates of arrest and dispositions. (Attach additional sheet(s), if necessary)

Notice: You are *not* required to disclose the existence of any arrest, criminal charge or conviction, the records of which have been erased pursuant to C.G.S. §§46b-146, 54-76o, or 54-142a. If your criminal records have been erased pursuant to one of these statutes, you may swear under oath that you have never been arrested. Criminal records that may be erased are records pertaining to a finding of delinquency or that a child was a member of a family with service needs (C.G.S. 46b-146), an adjudication as a youthful offender (C.G.S. 54-76o), a criminal charge that has been dismissed or nolle, a criminal charge for which the person has been found not guilty, or a conviction for which the person received an absolute pardon (C.G.S. 54-142a).

With regard to criminal history information arising from jurisdictions other than the State of Connecticut: You are not required to disclose the existence of any arrest, criminal charge or conviction, the records of which have been erased pursuant to the law of the other jurisdiction. Additionally, you are not required to disclose the existence of an arrest arising from another jurisdiction if you are permitted under the law of that jurisdiction to swear under oath that you have never been arrested.

Have you ever been CONVICTED under the laws of this state, federal law or the laws of another jurisdiction?

☐ NO ☐ YES If "YES," list all convictions, include charges, location, date of arrest, and disposition. (Attach additional sheet(s), if necessary)

Are you currently on probation, parole, work release, in an alcohol and/or drug treatment program or other pre-trial diversionary program or currently released on personal recognizance, a written promise to appear or a bail bond for a pending court case? ☐ NO ☐ YES If "YES," explain. (Attach additional sheet(s), if necessary)

Within the past five (5) years, have you been the subject of a Protective Order or Restraining Order issued by a court in a case involving the use, attempted use or threatened use of physical force against another person, regardless of the outcome or result of any related criminal case? ☐ NO ☐ YES

If "YES," which court issued the order?

Military History:

Were you ever a member of the Armed Forces of the United States? ☐ NO ☐ YES (If yes, please include a copy of your DD-214)

Were you ever discharged from the Armed Forces of the United States with a less than Honorable Discharge? ☐ NO ☐ YES

**STATE OF CONNECTICUT
DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
DIVISION OF STATE POLICE**

Proof of Training:

**Attach a copy of the letter or certificate attesting that you have completed a course in the safety and use of pistols and revolvers or long guns (as appropriate, depending upon which permit or certificate you are requesting), signed by the instructor of the course. Please make sure a copy of the certificate of completion for the additional training is also included.*

Instructor: (Check applicable box)

- ☐ **National Rifle Association**
☐ **Department of Energy and Environmental Protection (DEEP)**
☐ **Other:** _____

State Instructor's Name and ID Number: _____

Declaration:

I understand that any false statement herein, which I do not believe to be true and which is intended to mislead a public servant in the performance of his or her official function, is punishable by law (See CGS § 53a-157b). I further understand that any statement in this application that is determined to be false or inaccurate shall constitute grounds for the denial of such application. If approved before the facts are known, such approval shall be void if based on a false or inaccurate statement. My signature below attests to the accuracy, completeness and to the truth of all information supplied on this application:

I declare, under the penalties of false statement, that the answers to the above are true and correct.

Date _____

Signed _____

STATE OF _____

Print Name _____

COUNTY OF _____

Subscribed and sworn to before me this _____ day of _____ 20____

Name:

Notary Public

My Commission Expires:

Commissioner of Superior Court

NOTICE: Appeal Process for Permits

In the event that your application for pistol permit or eligibility certificate is denied or revoked, you may notify the Board of Firearm Permit Examiners, at 165 Capitol Ave, Suite 1070, Hartford, CT 06106. Telephone: (860) 256-2977 OR (860) 256-2947, in writing, within ninety (90) days, in order to begin your appeal process. At a hearing before the Board, you may request that your application be reconsidered or that your permit or eligibility certificate be reinstated.

For Official Use Only:

Application Received:

□□/□□/□□□□
Month/Day/Year

FBI Sent: ☐ No ☐ Yes
 FBI Reply: ☐ No ☐ Yes
 ICE Response: ☐ No ☐ Yes
 DMHAS: ☐ No ☐ Yes
 SPBI: ☐ No ☐ Yes
 Number : _____

Application Status:

☐ Approved ☐ Denied

(Signature and title of issuing authority)

S PROHIBITORS

for a *Felony or a Misdemeanor* *involving the use of a deadly weapon* *in Connecticut.*

a Pistol Permit, Eligibility Certificate handguns if they are less subject to a Protective or Restriction if they have been convicted of a crime in Connecticut for any of the following reasons:

• Narcotics or other controlled substances

• Homicide - 53a-58

• Degree - 53a-61

• 18 years or older in the third degree - 53a-62

• Permanent in the first degree - 53a-63

• Life second degree - 53a-96

• Life - 53a-175

• Degree - 53a-176

• Life

• Degree - 53a-181d, or

• Is delinquent for the commission of a crime while on probation, or

• Is in custody within the previous 180 days after having been found not guilty of a crime because of a mental disease or defect

• Is a person with a mental illness, as defined in section 17a-290, who is being held in custody for more than sixty months by order of a court

• Is admitted to a hospital for mental illness as defined in 17a-290 for more than six months for care and treatment of a mental illness, or is a person with a mental illness and not solely for a mental illness, or

• Is a seizure order issued pursuant to General Statute Section 29-38c, or is a person who has been found to be a person with a mental illness, or is an alien illegally or unlawfully in the United States.

Persons listed in Title 18 U.S.C.

VOLUNTARY SURRENDER

If you possess firearms which you would like to turn in to the Connecticut State Police for voluntary destruction or for police use, you should make arrangements through your local State Police barracks in advance.

SURRENDERS

INELIGIBLE PERSONS

Those persons deemed ineligible to possess (see firearm prohibitors) are required to relinquish their firearms by one of the following methods:

- 1) Turn your firearms in to the police. Your guns will be held for up to one year. You may at any time during the year transfer your guns to an eligible person. After the expiration of one year if your status has not changed your guns will be destroyed. You must notify the Special Licensing and Firearms Unit immediately at (860) 685-8285 to advise when and to which police department you turned in your firearms.
- 2) If instead you choose to legally transfer your firearms to an eligible person you must telephone the Special Licensing and Firearms Unit at (860) 685-8400 for an authorization number for each individual hand gun and long gun. A NICS background check will be conducted on the recipient at that time. You must then submit the sale or transfer form DPS-3C to the State Police.

Domestic Violence

Connecticut General Statute 29-36k requires that within 24 hours of such occurrence you must:

1. Transfer, in accordance with C.G.S. §§ 29-33, and 29-36k, all pistols, revolvers, firearms and ammunition you possess to a federally licensed firearms dealer pursuant to the sale of the pistol, revolver or other firearms; **or**
2. Deliver or surrender any/all firearms and ammunition to any Connecticut State Police Troop or organized municipal police department—not to include Headquarters in Middletown



**SPECIAL LICENSING
AND
FIREARMS UNIT**

Phone: (860) 685-8290

Fax: (860) 685-8496

Web site: www.ct.gov/despp

**Your Guide to
and Permit
Connecticut**



**SPECIAL LICENSING
AND
FIREARMS**

Revised 11/28/2017

Obtaining a Handgun

You may only buy a handgun in your home state.

If you are a resident in Connecticut, you are at least 21 years old, you possess a valid Permit to Carry, and you are a valid Eligibility Certificate holder, you may purchase a handgun from a Police Officer.

You must complete an Application to Purchase a Handgun (Form 38) and obtain an authorization from the State Police. This form shall be retained by the State Police.

You must then contact the State Police and obtain an authorization from the State Police. Four copies of the Sale or Transfer of Firearm (Form 38) must be completed. The seller must provide the purchaser as a resident in the town where the handgun was purchased. The seller must be a resident in the town where the handgun was purchased. One copy must be retained by the State Police in the town where the handgun was purchased.

Obtaining a Long Gun

Effective April 1, 2014

You will be required to have a valid Eligibility Certificate to Purchase a Long Gun. You must first complete an Application to Purchase a Long Gun (Form 38) and obtain an authorization from the State Police.

You must then contact the State Police and obtain an authorization from the State Police. Four copies of the Sale or Transfer of Firearm (Form 38) must be completed. The seller must provide the purchaser as a resident in the town where the long gun was purchased. The seller must be a resident in the town where the long gun was purchased. One copy must be retained by the State Police in the town where the long gun was purchased.

Denial of Your Handgun Purchase

If you have been denied authorization to purchase a handgun, you must request the reason for the denial. You may request a review of the denial by the State Police. You may also request a review of the denial by the State Police. You may also request a review of the denial by the State Police.

NICS

A National Instant Criminal Background Check (NICS) is a result of the request to the FBI for a background check. You may request a review of the NICS check by the State Police.

You may request a review of the NICS check by the State Police. You may also request a review of the NICS check by the State Police. You may also request a review of the NICS check by the State Police.

Pistol Permits

Once you have received your Temporary State Permit, you may apply to the DESPP for your State Permit. The cost of the State Permit is an additional \$70.00 and is valid for a period of five years. You will be required to have your photograph taken upon application and renewals. Applications and renewals shall be accepted at locations listed on the back of this brochure. Renewal notices will be sent to permit holders ninety days prior to expiration. There is a ninety day grace period after the expiration of your permit during which you may renew. Renewal instructions are available on-line at www.ct.gov/despp.

State Law requires the holder of a Pistol Permit to notify the Special Licensing and Firearms Unit of any change of residence address within two business days.

Lost or stolen Pistol Permits should be reported immediately in order to replace them. A \$5.00 duplication fee will be charged.

Ammunition Certificates

Effective October 1, 2013

If you do not intend to purchase anymore firearms after October 1, 2013 but would like to continue to purchase ammunition, you will be required to possess a Ammunition Certificate, or be listed as an exempted person, i.e., police officer. You must apply on a form DESPP-417C, and come to one of the DESPP permit offices to have your photograph taken. The fee is \$35.00 for a 5 year certificate and your renewal will be sent 90 days prior to expiration. **Applicants who have been convicted of any felony at any time or of any of the misdemeanors after July 1, 2013 will be denied.**

Eligibility Certificate to Purchase Long Guns

Effective April 1, 2014

After April 1, 2014 you will be required to possess a valid Eligibility Certificate to Purchase Long Guns, if you do not already possess a pistol permit or eligibility certificate for the purchase of pistols or revolvers. You may also purchase ammunition with this certificate. You may apply directly to DESPP on a DESPP-799-C form, which you may obtain on-line at www.ct.gov/despp, under the Special Licensing and Firearms page. It is a 5 year certificate and renewal will be sent 90 days prior to expiration. The fee is \$35.00 plus \$75.00 for the State fingerprint and \$12.00 for the FBI fingerprint fee. **Applicants who have been convicted of any felony at any time or of any of the misdemeanors after October 1, 1994 will be denied.**

Machine Guns

Machine Guns are strictly regulated by the U.S. Department of Treasury, Bureau of Alcohol Tobacco and Firearms (ATF) as well as the Connecticut State Police, Special Licensing and Firearms Unit (SLFU).

Connecticut residents may purchase Machine Guns if they are capable of a "full automatic only" rate of fire. Any select fire weapon is considered an "Assault Weapon" and is prohibited by State Law.

Dealers who are licensed to sell Machine Guns have all the necessary Federal paperwork required for that transaction.

Any Connecticut resident who owns a Machine Gun is required to complete State form DPS 418C, registering that Machine Gun with the SLFU immediately upon receiving it, and upon an annual basis thereafter.

Registered owners will be notified yearly with a registration form-letter which must be signed and returned to the SLFU prior to July 1 annually.

If you currently own a Machine Gun and do not receive a yearly registration form, you must contact the SLFU for instructions on registering your firearm.

Gun Shows

A Gun Show is defined as any event at which fifty or more firearms are offered or exhibited for sale, transfer or exchange and any event at which two or more persons are exhibiting one or more firearms for sale, transfer or exchange to the public.

All sales, transfers or exchanges taking place at a Gun Show require the seller to obtain an authorization number from the Special Licensing and Firearms Unit at 860-685-8400 or toll-free in-state at 888-335-8438.

Assault Weapons

Connecticut General Statutes 54-2a-13-3 amended by Public Acts 13-3 and 13-4 define assault weapons as described and defined in the statute. **(1) Any selective-fire firearm capable of being fired in automatic or burst fire mode, semiautomatic or burst fire mode, or any of the specified semi-automatic or burst fire mode.**

For a complete text of law and regulations, check on www.ct.gov/despp, State Police section or at the State Police website www.ct.gov. Refer to the Public Act 13-220.

Assault weapons owners must register for Possession (DPS-414-C) for Possession.

IF YOU POSSESS AN UNREGISTERED WEAPON AFTER JANUARY 1, 2014, YOU MUST CALL OUR OFFICE TO ARRANGE FOR THE DESTRUCTION AT NO COST.

PHOTO PERMIT LOCATION

DPS Headquarters
1111 Country Club Rd.
Middletown, Ct. 06457
(860) 685-8494

Troop E
1-395
(860) 848-6539
(between exits 6 & 9)
Montville, CT 06382
(860) 848-6539

Troop G
149 Prospect St.
Bridgeport, CT 06604
(203) 696-2532

Troop permit offices are located at the following locations:

inclement weather

Noncriminal Justice Applicant's Privacy Rights

Requesting Entity: _____

As an applicant who is the subject of a national fingerprint-based criminal history record check for a noncriminal justice purpose (such as an application for employment or a license, an immigration or naturalization matter, security clearance, or adoption), you have certain rights which are discussed below. **All notices must be provided to you in writing.**¹ These obligations are pursuant to the Privacy Act of 1974, Title 5, United States Code (U.S.C.) Section 552a, and Title 28 Code of Federal Regulations (CFR), 50.12, among other authorities.

- You must be provided an adequate written FBI Privacy Act Statement (dated 2013 or later), by the agency that will receive your criminal history results, when you submit your fingerprints and associated personal information. This Privacy Act Statement must explain the authority for collecting your fingerprints and associated information and whether your fingerprints and associated information will be searched, shared, or retained.²
- You must be advised in writing of the procedures for obtaining a change, correction, or update of your FBI criminal history record as set forth at 28 CFR 16.34.
- You must be provided the opportunity to complete or challenge the accuracy of the information in your FBI criminal history record (if you have such a record).
- If you have a criminal history record, you should be afforded a reasonable amount of time to correct or complete the record (or decline to do so) before the officials deny you the employment, license, or other benefit based on information in the FBI criminal history record.
- If agency policy permits, the officials may provide you with a copy of your FBI criminal history record for review and possible challenge. If agency policy does not permit it to provide you a copy of the record, you may obtain a copy of the record by submitting fingerprints and a fee to the FBI. Information regarding this process may be obtained at <https://www.fbi.gov/services/cjis/identity-history-summary-checks> and <https://www.edo.cjis.gov>.
- If you decide to challenge the accuracy or completeness of your FBI criminal history record, you should send your challenge to the agency that contributed the questioned information to the FBI. Alternatively, you may send your challenge directly to the FBI by submitting a request via <https://www.edo.cjis.gov>. The FBI will then forward your challenge to the agency that contributed the questioned information and request the agency to verify or correct the challenged entry. Upon receipt of an official communication from that agency, the FBI will make any necessary changes/corrections to your record in accordance with the information supplied by that agency. (See 28 CFR 16.30 through 16.34.)
- You have the right to expect that officials receiving the results of the criminal history record check will use it only for authorized purposes and will not retain or disseminate it in violation of federal statute, regulation or executive order, or rule, procedure or standard established by the National Crime Prevention and Privacy Compact Council.³

Updated 11/6/2019

If you need additional information or assistance, please contact:

Connecticut Records: Department of Emergency Services and Public Protection State Police Bureau of Identification (SPBI) 1111 Country Club Road Middletown, CT 06457 860-685-8480	Out-of-State Records: Agency of Record OR FBI CJIS Division-Summary Request 1000 Custer Hollow Road Clarksburg, West Virginia 26306
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SIGNATURE	DATE
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This document must be retained by the Entity.

¹ Written notification includes electronic notification, but excludes oral notification.

² See <https://www.fbi.gov/services/cjis/compact-council/privacy-act-statement>

³ See 5 U.S.C. 552a(b); 28 U.S.C. 534(b); 34 U.S.C. § 40316 (formerly cited as 42 U.S.C. § 14616), Article IV(c); 28 CFR 20.21(c), 20.33(d) and 906.2(d).

Requesting Entity: _____

FBI Privacy Act Statement

Authority: The FBI's acquisition, preservation, and exchange of fingerprints and associated information is generally authorized under 28 U.S.C. 534. Depending on the nature of your application, supplemental authorities include Federal statutes, State statutes pursuant to Pub. L. 92-544, Presidential Executive Orders, and federal regulations. Providing your fingerprints and associated information is voluntary; however, failure to do so may affect completion or approval of your application.

Principal Purpose: Certain determinations, such as employment, licensing, and security clearances, may be predicated on fingerprint-based background checks. Your fingerprints and associated information/biometrics may be provided to the employing, investigating, or otherwise responsible agency, and/or the FBI for the purpose of comparing your fingerprints to other fingerprints in the FBI's Next Generation Identification (NGI) system or its successor systems (including civil, criminal, and latent fingerprint repositories) or other available records of the employing, investigating, or otherwise responsible agency. The FBI may retain your fingerprints and associated information/biometrics in NGI after the completion of this application and, while retained, your fingerprints may continue to be compared against other fingerprints submitted to or retained by NGI.

Routine Uses: During the processing of this application and for as long thereafter as your fingerprints and associated information/biometrics are retained in NGI, your information may be disclosed pursuant to your consent, and may be disclosed without your consent as permitted by the Privacy Act of 1974 and all applicable Routine Uses as may be published at any time in the Federal Register, including the Routine Uses for the NGI system and the FBI's Blanket Routine Uses. Routine uses include, but are not limited to, disclosures to: employing, governmental or authorized non-governmental agencies responsible for employment, contracting, licensing, security clearances, and other suitability determinations; local, state, tribal, or federal law enforcement agencies; criminal justice agencies; and agencies responsible for national security or public safety.

As of 03/30/2018

Note: This privacy act statement is located on the back of the FD-258 fingerprint card.

SIGNATURE	DATE
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This document must be retained by the Entity.

Declaración de la Ley de Privacidad

***Esta declaración de la ley de privacidad se encuentra al dorso del
FD-258 tarjeta de huellas digitales.***

Autoridad: La adquisición, preservación, e intercambio de huellas digitales e información relevante por el FBI es autorizada en general bajo la 28 U.S.C. 534. Dependiendo de la naturaleza de su solicitud, la autoridad incluye estatutos federales, estatutos estatales de acuerdo con la Pub. L. 92-544, Órdenes Ejecutivas Presidenciales, y reglamentos federales. El proveer sus huellas digitales e información relevante es voluntario; sin embargo, la falta de hacerlo podría afectar la terminación o aprobación de su solicitud.

Propósito Principal: Ciertas determinaciones, tal como empleo, licencias, y autorizaciones de seguridad, podrían depender de las investigaciones de antecedentes basados en huellas digitales. Se les podría proveer sus huellas digitales e información relevante/ biométrica a la agencia empleadora, investigadora, o responsable de alguna manera, y/o al FBI con el propósito de comparar sus huellas digitales con otras huellas digitales encontradas en el sistema Next Generation Identification (NGI) del FBI, o su sistema sucesor (incluyendo los depósitos de huellas digitales latentes, criminales, y civiles) u otros registros disponibles de la agencia empleadora, investigadora, o responsable de alguna manera. El FBI podría retener sus huellas digitales e información relevante/biométrica en el NGI después de terminar esta solicitud y, mientras las mantengan, sus huellas digitales podrían continuar siendo comparadas con otras huellas digitales presentadas a o mantenidas por el NGI.

Usos Rutinarios: Durante el procesamiento de esta solicitud y mientras que sus huellas digitales e información relevante/biométrica permanezcan en el NGI, se podría divulgar su información de acuerdo a su consentimiento, y se podría divulgar sin su consentimiento de acuerdo a lo permitido por la Ley de Privacidad de 1974 y todos los Usos Rutinarios aplicables según puedan ser publicados en el Registro Federal, incluyendo los Usos Rutinarios para el sistema NGI y los Usos Rutinarios Generales del FBI. Los usos rutinarios incluyen, pero no se limitan a divulgación a: agencias empleadoras gubernamentales y no gubernamentales autorizadas responsables por emplear, contratar, licenciar, autorizaciones de seguridad, y otras determinaciones de aptitud; agencias de la ley locales, estatales, tribales, o federales; agencias de justicia penal; y agencias responsables por la seguridad nacional o seguridad pública.

A partir de 30/03/2018

Exhibit D

[Home](#) [Services](#) [Special Licensing](#) [Forms & Resources](#)
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[FAQ-Pistol
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[FAQ-Special
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[Firearms And
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Forms And
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Special Licensing And Firearms

CT DEALERS:

- To read the 9/26 memo regarding the dealer inventory and other legislative changes [click here](#)
- To access the new inventory form [click here](#)

CT PISTOL PERMIT INSTRUCTORS:

- After the initial roll out of the supplemental DESPP standardized PowerPoint in March of 2024, updates have been made to the content within the PowerPoint. The current PowerPoint (version date 11/25/2024) is now available on our website. This is the most current version and should be used when instructing in order to satisfy the requirements within Public Act 23-53, and C.G.S. 29-28. This PowerPoint is intended to supplement the NRA Basics of Pistol Shooting course as well as any independent curriculum approved by the Commissioner. After teaching this PowerPoint, in conjunction with the full safety course curriculum and live fire portion, the instructor should issue both the certificate of completion of the safety course, as well as the certificate of completion for the DESPP supplemental.

- [Power Point Presentation](#)
- [Certificate of Completion](#)

FEEDBACK +

[General Statutes](#)

- Please see the attached memo regarding updates about the NRA Course for the Pistol Permit Application Training Requirement. More information will be posted here as it develops. [NRA Instructors - New Legislative Requirements](#)

[Information For Retirees](#)

- To read the memo for CT pistol permit firearms instructors [click here](#)

[Law Enforcement Forms](#)

- To access the instructor Lesson Plan Tracking form [click here](#)

[Office Hours And Location](#)

Effective 9/14/2023, SLFU will now be accepting pistol permit renewals online. For the instructions on how to complete an online renewal, click [HERE](#). To access the online renewal portal, click [HERE](#). This process can still be completed by mail; however, it is STRONGLY recommended that you utilize the online portal. Starting 1/1/24 all credit card transactions will include a 3% service fee. The service fee is applicable exclusively to transactions made with a credit card, both in person and online. The fee is not included when using cash, checks or money order as a form of payment.

[Pawn/Second Hand/Precious Metal Dealers](#)[Private Detectives](#)

Effective 9/11/2023, SLFU will no longer facilitate the private sale of a firearm between two individuals. The State statute for a firearm sale requires a query of the FBI-NICS system, which is not authorized by the FBI unless an FFL is involved. In order to satisfy the state law and the federal regulation, every private citizen sale to another private person must be facilitated through an FFL.

[Private Security Companies](#)[Professional Bail Bondsman](#)

On 6/6/2023, Public Act 23-53 (House Bill 6667) was signed into Connecticut law. Sales of so-called "other" and "pre-ban" weapons, unless pursuant to an exception, are now prohibited. Follow the link to File No 841 with the final text and summary of each section. [File No. 841](#)

[Special Licensing And Firearms](#)[Special Licensing Hearings](#)[State Pistol Permit](#)

Updated information about Form 1 filing pursuant to ATF Regulation change - [Memo 3/30/2023](#)

[Back To Home](#) >

FAQ's for recent change to Federal Regulations about arm braces/stabilizing braces: [Memo](#) - 02/08/2023

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SEARCH

Division of State Police - HQ

State of Connecticut

Department of Emergency Services and Public
Protection

Division of State Police - HQ

Special Licensing and Firearms Unit

1111 Country Club Road

Middletown, CT 06457

Telephone (860) 685-8290

Email: DESPP.SLFU@ct.gov



Special Licensing & Firearms Unit - HQ

- **Effective January 1, 2025, the FBI Fingerprinting Fee will decrease to \$12.00**
- **Effective December 1, 2017, the State Criminal History Record search rate will increase from \$50.00 to \$75.00**

**Exact Cash, Checks Or Money Orders ONLY.
We Do Not Have The Ability To Make
Change.**

The Special Licensing and Firearms Unit (SLFU) is responsible for the issuance of the following:

- [State Pistol Permits](#)
- [Eligibility certificates for pistols and revolvers](#)
- [Eligibility certificates for the purchase of long guns](#)
- [Ammunition certificates](#)
- [Oversight and regulation of firearm sale transactions](#)

- [Licensing of Professional Bail Bondsman](#)
- [Licensing of Private Security Companies](#)
- [Licensing of Private Investigators](#)
- [Licensing of Bail Enforcement Agents](#)
- [Licensing of Precious Metals and Pawn Brokers](#)
- [Security Guard Cards](#)
- [Licensing for Fireworks and Explosives](#)

The unit is located at Connecticut State Police Headquarters in Middletown, CT. We also have a satellite office at Troop G in Bridgeport and Troop E in Montville to process pistol permit applications.

The unit is also responsible for investigating violations of state law relating to the purchase, sale and transfer of firearms, and violations of statutes relating to the various professional licenses it issues.

Office Hours

Special Licensing & Firearms Unit – HQ

1111 Country Club Road
Middletown, CT 06457
Tel. (860) 685-8290

- **Monday through Friday: 8:30 am – 4:15 pm**

HOLIDAY HOURS

- Tuesday 12/24/2024 (Christmas Eve) 8:00am–1:00pm Authorizations
- 8:30am–1:00pm Pistol Permit Window
- Tuesday 12/31/2024 (New Years Eve) 8:00am–1:00pm Authorizations
- 8:30am–1:00pm Pistol Permit Window

Directions:

91 South from Hartford:

- Exit 20 for Middle Street
- Turn Left on Middle Street
- 1st right on Country Club

- Destination will be on the left

91 North toward Hartford:

- Exit 20 for Middle Street
- Turn left on Country Club Road
- Destination will be on the left

Troop G – Bridgeport

149 Prospect Street
Bridgeport, CT 06604
Tel. [\(203\) 696-2532](tel:(203)696-2532)

- **Tuesday, Wednesday, Friday and Saturday:**
8:00am – 12:00pm & 12:30pm – 4:00pm
- **Thursday Hours will be 10:30am – 2:00pm & 2:30pm – 6:30pm**

HOLIDAY HOURS

- Tuesday 12/24/2024 (Christmas Eve) Closed
- Thursday 12/26/2024 8:00 am – 4:30 pm
- Tuesday 12/31/2024 CLOSED

Directions:

95 South:

- Exit 27 toward Lafayette Boulevard
- Take 27A on the left for Trumbull
- Merge onto South Ave.
- Turn right on Warren Street
- Take the 1st right onto Prospect Street

95 North toward New Haven:

- Take Exit 27 toward Lafayette Boulevard
- Slight right onto South Frontage Road
- Take 1st left onto Warren Street
- Turn right onto Prospect Street
- Destination will be on the right

Troop E – Montville

I-395 North (Between exits 6 & 9)

Montville, CT 06382

Tel. (860) 848-6518

- **Tuesdays and Saturdays 8:00am–10:15am, 10:30am–12:00pm, 12:30pm–2:00pm, 2:15pm–4:15pm**

HOLIDAY HOURS

- Tuesday 12/24/2024 (Christmas Eve) 8:00am–1:00pm Pistol Permit Window
- Tuesday 12/31/2024 (New Years Eve) 8:00am–1:00pm Pistol Permit Window

Directions:

- Located on 395 North between exits 79 & 79A

Attention Active Military Personnel and Veterans

MOS Security Training and Licensing Fee Waiver for qualifying armed forces personnel.

Public Act 14-131: Effective October 1, 2014, military personnel seeking license as a security officer in Connecticut may qualify for a waiver of the required security training course and licensing fee. Please contact the Special Licensing and Firearms Unit at 860-685-8494 to speak to security licensing personnel for additional information and specific requirements.

[Link to Public Act 14-13](#)

Last Date Modified: 06/12/2024

Department of Emergency Services and Public Protection



1111 Country Club Road
Middletown, CT 06457

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Mast: (Full)



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