

UNCHECKED, UNACCOUNTABLE, DEADLY:

**A Handful of Gun Dealers
Are Fueling Pennsylvania's
Gun Violence**





Pennsylvania Welcomes You

EXECUTIVE SUMMARY

Gun dealers play the critical role of gatekeepers to those wishing to acquire a firearm: their conduct has a direct bearing on whether guns are diverted to the illegal market or made available to individuals who are at risk of harming themselves or others. Irresponsible, negligent, or reckless business practices by gun dealers are a root cause of guns used in crime. In Pennsylvania, gun dealers are subject to little to no oversight from federal and state regulators, which could stop unlawful sales. We are seeing the consequences of both federal and state inaction in Pennsylvania: The vast majority of guns used in crimes in Pennsylvania originate from in-state gun dealers who are licensed under both federal and state law¹ and yet are not subject to a level of oversight that deters negligent business practices and intentional gun trafficking.

Fortunately, the number of Pennsylvania dealers in need of reform is few. The state's nearly 3,300 gun dealers and pawnbrokers sold a total of 843,484 firearms in 2023. The total number of guns recovered from crimes in Pennsylvania by law enforcement agencies that year was 17,027, and of those that could be traced, more than three-quarters came from gun dealers in the state. However, the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) has cited less than 2% of the state's gun dealers as high crime gun dealers selling significant numbers of guns recovered in crimes in a given calendar year.

In order to stem the flow of guns to people who commit crimes, gun dealers must be inspected regularly for compliance with the law. ATF, the sole federal agency with oversight of the gun industry, is currently ill-equipped to perform such necessary oversight. While ATF states it aims to inspect each dealer every three years², at the current rate, ATF would only inspect a Pennsylvania dealer once every 17 years.³ This rate can be expected to slow even further if proposed cuts to terminate two-thirds of the agency's inspector positions are carried out.⁴ Accordingly, Pennsylvania state and

local law enforcement must fill this gap and routinely inspect dealers, issue appropriate citations, and revoke licenses when justified. Pennsylvania law permits such inspections and authorizes both state and certain local law enforcement agencies to conduct them. A state appellate court recently affirmed this when it upheld the Montgomery County sheriff's right to inspect dealers operating in the county.⁵ Pennsylvania state law similarly requires inspections in other industries, such as food processing,⁶ and those inspections have been shown to save lives.⁷ The gun industry should not be subject to any lesser standards.

In the absence of adequate oversight from the federal government, state lawmakers can strengthen the laws that govern gun dealers who do business in Pennsylvania by creating enforcement and accountability standards. States with stronger laws regulating gun dealers have lower rates of guns flowing from the legal to illegal marketplace.⁸ Pennsylvania needs to enhance its current licensing scheme to create a robust system of dealer licensing and oversight that includes proper vetting, background checks, and training of employees; robust security system requirements including secure storage and audio/video surveillance systems; recordkeeping and retention improvements; and liability insurance. Pennsylvania law currently allows for the revocation of licenses, but must also include the option to fine and suspend licenses. Most importantly, the state needs to uniformly enforce responsible business standards for gun dealers to stem the flow of firearms into communities across the Commonwealth.

The safer operation of the gun industry in Pennsylvania will not only save lives but improve communities generally by ensuring that only responsible and law abiding gun dealers are doing business in the Commonwealth. Pennsylvanians deserve no less.

INTRODUCTION

For decades, Locks Philadelphia Gun Exchange (Locks) in Philadelphia was one of the biggest suppliers of guns used in crimes in Pennsylvania.⁹ In only three years, nearly 500 guns used in crimes in Pennsylvania were traced back to Locks.¹⁰ In one of the more than 60 Pennsylvania murder investigations involving a gun from Locks,¹¹ a man killed his family, including his 7-year-old step-brother, the same day he bought the gun.¹² While the owner of Locks claimed “we do everything by the books,”¹³ the facts tell a different story.

Locks has a serious history of violating the law. In order to help ATF uncover trafficking rings, gun dealers must report when a purchaser buys more than one handgun over a period of five business days. One inspection in 2011 uncovered that Locks failed to file these reports for **more than 40%** of its multiple sales. This was despite being cited five years earlier for the same violation and assuring an inspector that they would file multiple sale reports.¹⁴ In 2016, Locks was cited for this same violation yet again.¹⁵

In addition, inspectors found inconsistencies in Locks’s inventory records. In three different inspections, they were missing firearms.¹⁶ Missing firearms are considered by ATF to be a very serious issue¹⁷ as they can indicate lax store security or dealing guns “off the books.”

Despite the large number of crime guns consistently traced back to Locks, and repeated violations uncovered during ATF inspections, ATF allowed Locks to continue selling firearms.¹⁸ Finally, in July 2023, during the period when ATF was empowered to rescind the licenses of dealers who commit serious violations, ATF revoked Locks’ license to sell guns.¹⁹

The overwhelming majority of guns used or suspected of being used in crimes (“crime guns”) originate from a small number of federally licensed gun dealers (referred to as Federal Firearm Licensees, or FFLs). According to the latest national data from ATF, 90% of guns used in crimes originate from only 5% of gun dealers, and 57% come from just 1.2% of dealers.²⁰ More recent data from Pennsylvania mirrors this finding—57% of crime guns traced between 2018 and 2020 in Pennsylvania also came from 1.2% of dealers.²¹

Many crime guns are acquired from dealers by straw purchasers or gun traffickers. Others enter the

90% OF GUNS USED IN CRIMES ORIGINATE FROM ONLY 5% OF GUN DEALERS

criminal marketplace when they are sold illegally without background checks or stolen from a store. Whether a dealer is knowingly diverting guns or is merely behaving recklessly, the results are disastrous. One study showed that for every dealer that committed a serious violation of federal law, such as selling to a prohibited person, homicides in the neighborhood where they were located nearly doubled.²²

But such diversion of guns to the illegal market is not inevitable. Strong regulation of gun dealers, coupled with inspections to ensure dealers comply with the law, can have a remarkable impact on stopping the flow of guns to the streets and preventing the violence they cause — up to a 51% reduction in homicides in fact.²³ Inspections are routinely and successfully used in other industries to improve public health and safety. The gun industry should be no different.

ATF, the federal agency responsible for licensing gun dealers, has the authority to inspect dealers for compliance with the laws.²⁴ Historically, ATF inspections are infrequent and overly lenient. Of the more than 3,200 licensed gun dealers in Pennsylvania,²⁵ ATF inspected fewer than 200 (less than 6%) of them in 2024.²⁶ When dealers are found to be violating federal laws, their licenses are hardly ever revoked. A Brady analysis of ATF data between 2013 and 2021 shows that less than 0.5% of inspected FFLs were revoked nationally, despite the fact that a majority of inspections found violations of the law.²⁷

Under the Biden Administration, this began to change. Many dealers who had been allowed to violate federal law for years finally had their licenses revoked when, in 2021, ATF instituted its Enhanced Regulatory Enforcement Policy, also known as “Zero Tolerance,” which led to a quadrupling of license revocations.²⁸ During the three and a half years of Zero Tolerance, 644 dealers lost their federal licenses due to serious violations.²⁹ Then President Donald Trump took office and started undoing this progress. Within three months, his administration terminated the Zero Tolerance policy,³⁰ even going as far as inviting dealers who lost their licenses

due to violations, like Locks in Philadelphia—one of Pennsylvania’s biggest crime gun suppliers—to reapply.³¹

Despite federal inaction, Pennsylvania communities do not have to live with lawbreaking dealers flooding their communities with illegal guns; state and local law enforcement can pick up the enormous slack left by the federal government. Pennsylvania can enforce state laws regulating gun dealers by conducting regular inspections. And while Pennsylvania law already goes beyond some federal regulation of dealers, the state can make those laws stronger and more effective.

Research from 54 cities in states with strong laws regulating gun dealers revealed that when state or local law enforcement conducted regular compliance checks of dealers, there was significantly less firearm trafficking of guns purchased from FFLs than in states with weaker laws or no compliance checks.³²

Pennsylvania’s residents deserve to be protected from the scourge of illegal guns. It is incumbent upon state lawmakers to ensure that the gun dealers doing business in the Commonwealth are subject to the types of strong and effective laws that prevent the diversion of guns to the illegal market. It is also the responsibility of state and local law enforcement to ensure that gun dealers follow all firearms laws.

THE DATA

Holding the local gun industry accountable for its role in diverting crime guns into Pennsylvania communities does not require wholesale change across the entire industry. In fact, as discussed throughout this report, very few gun dealers are

TABLE 1: TOTAL FIREARMS SALES AND TRANSFERS IN PENNSYLVANIA, 2019-2023

YEAR	TOTAL FIREARM SALES & TRANSFERS
2023	843,484
2022	901,714
2021	1,045,890
2020	1,141,413
2019	766,204

Source: Pennsylvania State Police Firearms Annual Reports, 2019-2023.

responsible for selling the vast majority of crime guns.

With roughly 3,300 FFLs who manufacture, import, or sell firearms, Pennsylvania ranks fourth among states for the highest number of gun dealers; 2,300 of these are retail gun dealers and pawnbrokers.^{33,34} In 2023, Pennsylvania FFLs sold a total of 843,484 firearms, including 458,554 handguns. Since the surge of gun sales during the pandemic, the number of firearms sold in Pennsylvania has been declining, which mirrors the trends across the country.^{35,36}

While there are FFLs in every county in Pennsylvania, dealers in just five counties supply one-fourth of all the guns sold in the state. These five counties are home to 19% of the state’s FFLs.³⁹

TABLE 2: TOP FIVE PA COUNTIES FOR FIREARMS SALES, 2023

COUNTY	TOTAL HANDGUN SALES	TOTAL LONG GUN SALES	TOTAL FIREARM SALES	TOTAL FFLS
ALLEGHENY	37,560	19,229	56,789	130
BUCKS	36,701	17,215	53,916	112
LANCASTER	23,925	18,509	42,434	68
BERKS	19,391	14,502	33,893	97
YORK	16,674	13,218	29,892	136

Source: 2023 Pennsylvania State Police Firearms Annual Report

Far more guns are sold in Pennsylvania in a given year than there are guns recovered from crimes. In 2023, the total number of crime guns recovered by Pennsylvania law enforcement agencies was 17,027, of which 81% were handguns. There were at least 985 Pennsylvania municipalities that recovered one or more crime guns in 2023. The cities that recovered the most crime guns are among the most populous in the state, and yet, with the exception of Pittsburgh, these cities are not located in the counties with the most gun dealers.

Of the over 17,000 crime guns recovered in Pennsylvania and submitted to ATF for tracing, 12,840 were successfully traced to their first retail purchase. Over three-fourths (77.6%) were traced to gun dealers in Pennsylvania, indicating that the state’s crime gun problem is mostly locally-grown. In addition, half of the traced crime guns were first

purchased less than three years prior to recovery — a strong indicator that the guns were trafficked.⁴⁰

TABLE 3: TOP FIVE PENNSYLVANIA CRIME GUN RECOVERY CITIES, 2023

CITY	NUMBER OF CRIME GUNS RECOVERED	POPULATION RANK
PHILADELPHIA	6,316	1
PITTSBURGH	1,314	2
HARRISBURG	433	9
ALTOONA	353	12
ERIE	300	5

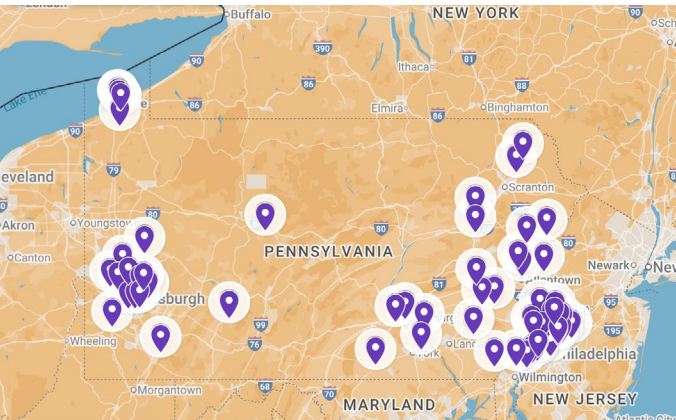
Sources: ATF, Firearms Trace Data: Pennsylvania - 2023 (Data Source: Firearms Tracing System) January 1, 2023 – December 31, 2023; US Census Bureau, 2023 American Communities Survey, July 2023 population estimates

Sources of Crime Guns

The data presented above paints a picture of a state with a large gun industry, where the pandemic gun sales surge has yet to completely ebb, and where crime guns heavily impact a few cities. But the aggregate 2023 ATF trace data does not tell us which gun dealers supplied the crime guns causing harm in these communities.

For that, we turn to the ATF’s Demand Letter 2 Program, which identifies dealers who had 25 or more crime guns traced to them in one calendar year that were recovered less than three years after being sold. The 61 dealers in Pennsylvania who have been part of this program since 2021 represent just 2.2% of the dealers in the state.⁴¹

MAP 1: PENNSYLVANIA FFLS IN ATF DEMAND LETTER 2 PROGRAM, 2021-2024



Source: Brady (2025, June). The Suppliers of America’s Gun Violence Epidemic: 2024 Update

Most of these dealers are located in the Pittsburgh and Philadelphia metro areas, as shown on the map below.⁴²

Small Number of Dealers

The Demand Letter 2 program provides the most recent glimpse into the state’s crime gun suppliers, but has limitations and cannot provide us with a complete picture. The most comprehensive dataset of Pennsylvania crime guns is Pennsylvania’s Gun Tracing Analytics Platform (see sidebar explaining the dataset.)

The database has now been taken offline; however, the three most recent years of Pennsylvania’s Gun Tracing Analytics Platform data (2018, 2019, and 2020), which capture a total of over 30,200 crime guns, can still tell us quite a bit about the behavior of the state’s gun industry.

WHAT WAS THE PENNSYLVANIA GUN TRACING ANALYTICS PLATFORM?

The Pennsylvania Gun Tracing Analytics Platform was launched in 2019 by the then Pennsylvania Attorney General, Josh Shapiro, as part of an initiative for “investigating how prohibited purchasers obtain firearms and strategically shutting down those pipelines.”⁴³ The now offline platform showed aggregate crime gun trace information from participating law enforcement agencies, allowing Pennsylvanians to examine the sources of crime guns in their communities. The raw data on the crime gun traces, downloaded by Brady in August 2021, showed which dealer sold the gun, and when and how it was used in a crime.⁴⁴ The complete database included 4,318 Pennsylvania dealers, who together sold 91,689 guns recovered in crime between 1977 and 2020.⁴⁵ The data, while the best look at the sources of crime guns in Pennsylvania since at least the early 2000s, is not a fully comprehensive picture, primarily because it only includes law enforcement agencies in the state that participate in data sharing, and the time range for the data varied wildly from agency to agency. For more details on the dataset and methodology, see Brady’s 2022 Pennsylvania [report](#).⁴⁶

TABLE 4: MOST RECENT PENNSYLVANIA GUN TRACE DATA

CITY	2020	2019	2018
TOTAL TRACES	10,133	10,451	9,625
TRACES TO IN-STATE DEALERS	5,940 (58.6%)	6,322 (60.5%)	5,865 (60.9%)
TRACES TO PA DEALERS ACTIVE AS OF 2022	5,721 (56.5%)	3,978 (38.1%)	3,534 (36.7%)

Source: Brady. Uncovering the Truth about Pennsylvania Crime Guns. 2022.

Of the crime guns recovered by law enforcement agencies in Pennsylvania from 2018 through 2020, 60% were first sold by dealers in Pennsylvania. Many of these dealers continue to operate. In fact, Brady found that of the top 30 dealers with the most traced crime guns, almost half are still in business.⁴⁷

TABLE 5: TOP FIVE PENNSYLVANIA COUNTIES SUPPLYING CRIME GUNS

COUNTY	PERCENT OF PA CRIME GUNS TRACED TO COUNTY'S DEALERS
PHILADELPHIA	24.3%
ALLEGHENY	11.8%
DELAWARE	8.2%
MONTGOMERY	5.9%
BUCKS	4.9%

Source: Brady. Uncovering the Truth about Pennsylvania Crime Guns. 2022.

The top five source counties for crime guns in the database align with more current data showing the top counties for numbers of dealers and total firearm sales. This is except for the number one source of crime guns — Philadelphia County, which earns this distinction despite not making the top five for number of FFLs or total firearm sales.

Data from the Pennsylvania Gun Tracing Analytics Platform mirrors older ATF data that indicate most crime guns are sourced by only a few gun dealers. The top 1.2% of Pennsylvania crime gun dealers source 57% of crime guns in the database⁴⁸ — nearly identical to the latest national numbers.⁴⁹ This ratio of a few dealers supplying the majority of

recovered crime guns holds true even when narrowing the scope to just short time-to-crime guns (guns recovered less than three years after being sold). Just 26 dealers (or 1.6% of dealers with at least one short time-to-crime gun trace) sold half of the 20,197 short time-to-crime guns in the database.⁵⁰

The gun industry's explanation for this pattern is that selling crime guns is just a “cost of success” for dealers selling large quantities of firearms. Yet ATF concluded that “sales volume alone does not account for the disproportionately large number of traces associated with these firearms dealers.”⁵¹ Other research has also found that a gun dealer's sales volume cannot fully account for a dealer's number of crime guns.⁵²

A more robust explanation is that a dealer's behavior affects the number of crime guns they supply. In fact, research repeatedly shows a dealer's business practices have a direct correlation with the number of crime guns traced back to them.⁵³ In other words, better business practices lead to fewer crime guns. This is illustrated by a legal settlement in New York which resulted in top crime gun sellers agreeing to institute better business practices and submit to more oversight, including inspections. When they did so, the number of crime guns recovered in New York City from those dealers dropped by 84%.⁵⁴

The upside of these findings is that the small subset of poorly behaved dealers who sell most of the state crime guns can be held accountable.

Dealer behavior and gun trafficking

As stated above, dealer behavior is an important predictor of the number of crime guns a dealer will supply. Gun dealers who facilitate sales to straw purchasers, gun traffickers, and unlicensed dealers ignore red flags that indicate an illegal sale is taking place. These indicators include, but are not limited to:

- multiple or bulk purchases of guns;
- the purchase of similar or identical firearms, particularly in the same transaction or within a short amount of time;
- a passive buyer accompanied by one or more people who seem more interested in purchasing firearms (especially if said people attempted to purchase a firearm at the dealer before, but were denied after failing a background check);
- paying in cash;

- paying with a bank card in a name that does not match the name on the buyer’s identification document.

Unfortunately, some dealers are willing to ignore these red flags in order to complete a sale. Straw purchases, in which someone buys a gun on behalf of the intended user, are illegal under both federal and Pennsylvania law. In several studies, researchers, pretending to be potential customers, called dealers to ask about buying a handgun for either themselves or a girl/boyfriend. In one, a large majority (71%) of the dealers indicated that they would sell to the caller regardless of the end-user of the gun.⁵⁵ Further, research has consistently shown more than 20% of the dealers agree — over the phone, where they know they could be recorded — to conduct a clearly illegal straw purchase.⁵⁶

In Pennsylvania, as in the country as a whole, signs of straw purchasing and gun trafficking are on the rise. ATF considers a short time-to-crime (TTC) of less than three years to be a “trafficking indicator”⁵⁷ that “signals direct diversion, by illegal firearms trafficking — for instance through straw purchases or off-the-books sales by corrupt FFLs.”⁵⁸

From 2017 to 2023, the national median TTC decreased almost 31% from 4.2 years to 2.9 years.⁵⁹ Slightly over half of the Pennsylvania crime guns recovered and traced in 2023 had a time-to-crime of under 3 years.⁶⁰ Of the traces through 2020 in the Pennsylvania’s Gun Tracing Analytics Platform database, 44% had a TTC of under 3 years, substantially less than the traced guns reflected in the most recent data.⁶¹

Another indicator of trafficking is if the gun has changed hands, meaning that the purchaser of the gun is a different person than the possessor of the gun at the time it was recovered. Nearly 60% of guns supplied by Pennsylvania dealers and successfully traced from 2017-2021 were possessed by someone other than the original purchaser.⁶²

Guns that are recovered in other states are also likely to have been trafficked, especially if the guns were recovered shortly after being sold. More than a quarter (25.8%) of crime guns supplied by Pennsylvania dealers and used in crimes in 2017-2021 were used in crimes out of state, and even internationally.⁶³ And in 2023, Pennsylvania’s gun dealers were a major source of crime guns recovered

TABLE 6: PENNSYLVANIA-SUPPLIED CRIME GUNS BY RECOVERY STATE, 2023

RECOVERY STATE	GUNS WITH TTC UNDER 3 YEARS	GUNS WITH TTC 3 YEARS AND OVER	AVERAGE TTC (YEARS)
DELAWARE	66	65	7.11
NEW JERSEY	245	287	8.14
NEW YORK	243	354	9.44
MARYLAND	98	229	11.62

Source: ATF 2023 aggregate trace statistics⁶⁴

in the nearby states of Delaware, New Jersey, New York, and Maryland.

One final gauge of gun trafficking is the volume of straw purchase investigations and prosecutions. In 2023, the Pennsylvania State Police initiated 9,153 investigations under 18 Pa.C.S. §6111(g)(4), the statute which prohibits straw purchasing. In addition, 255 people were convicted of violating the statute.⁶⁵

Taken as whole, these indicators paint a vivid picture of a significant gun trafficking problem in Pennsylvania; a problem that is preventable.

THE SOLUTIONS

Because of their access to large amounts of firearms and ammunition, gun dealers who break the law or act carelessly pose a unique danger to public safety. A 2023 study of gun dealers and homicides in Columbus, Ohio, found that when gun dealers broke the law, there were more homicides in the community in which they were located. In fact, for every dealer who engaged in serious violations, homicides increased by over 96%. The study’s authors recommended that to remedy this problem, dealers be inspected and penalized when found to have engaged in violations.⁶⁶

In order to prevent trafficking and reduce homicides, law enforcement must inspect dealers for compliance with the laws, and consistently enforce the law to stop dealers from committing violations that endanger public safety. Pennsylvania should also consider strengthening its laws to ensure that only reputable, law-abiding people are selling firearms in Pennsylvania communities and that all dealers abide by the safest business practices.

Licensed Gun Dealer Inspections

1. Dealers have control over enormous amounts of deadly weaponry. Inspecting them is paramount for public safety.

Inspecting gun dealers for compliance with state and federal law is essential for uncovering and deterring criminal behavior. In 2022, ATF explained to Congress why inspecting firearm dealers is so important to public safety.

ATF inspection of firearms licensees is focused not only on ensuring regulatory compliance, but also on integrating and analyzing risk factors to detect diversion from lawful commerce and identifying ‘straw purchasers’ who illegally purchase firearms to supply guns to criminals. . . . The ATF’s FFL inspection program uses information related to recovered firearms to detect indicators of illegal firearms trafficking. The ATF processes provides [sic] leads to investigators for inspection of specific dealers who may be violating Federal laws intended to protect the American public.⁶⁷

Of the relatively small number of dealers inspected by the ATF before the Zero Tolerance policy, a majority were found to be violating federal gun laws.⁶⁸ Even before President Trump took office and promised to gut ATF’s funding and staffing,⁶⁹ ATF has been chronically underfunded and understaffed,⁷⁰ leading to most dealers being inspected only once a decade.⁷¹ In 2024, ATF inspected only 193 dealers in Pennsylvania,⁷² representing less than 6% of its dealers.⁷³ That year, ATF’s Pennsylvania division performed fewer inspections than 75% of its counterparts, ranking 19th out of 25 divisions.⁷⁴ At the current rate, ATF would only inspect a Pennsylvania dealer once every 17 years.²⁵ This is likely to become even more rare: the Trump administration’s proposed federal budget for 2026 would cut more than 65% of inspectors.⁷⁶

State and local law enforcement can fill this enormous inspection gap as recently affirmed by a state appellate court.⁷⁷ The court stated, “There is undoubtedly a substantial governmental interest underpinning our Commonwealth’s licensing scheme, as tight regulation of retail firearms dealers is necessary to prevent undesirable individuals from

obtaining weapons that will potentially facilitate criminal activity.”⁷⁸ The “tight regulation” of dealers identified by the court involves state and local law enforcement inspections. In fact, it is their responsibility to inspect dealers to keep guns from flowing illegally from dealers to the streets — guns which often flow from the suburbs to underserved urban communities.⁷⁹ For decades, firearm dealers have been licensed by Pennsylvania law enforcement without being inspected for compliance with public safety laws. It is time for this to change.

2. Pennsylvania’s dealer laws must be enforced before more lives are lost.

Pennsylvania requires FFLs to obtain a license from the police department of a city or sheriff of the county in which the dealer is located.⁸⁰ Licenses must be issued only to “reputable” applicants⁸¹ and applicants must acknowledge that:

By signing the application [for a license to sell firearms] . . . the applicant gives permission to the Pennsylvania State Police, or their designee, and the issuing authority to come to the licensee’s business location and inspect the premises, records, and documents without a warrant, to ensure compliance with this chapter, and the act.⁸²

Although Pennsylvania law includes penalties for dealers who violate its laws, the state does not conduct routine inspections of dealers, making it nearly impossible to detect those violations. As a result, violations often go unnoticed and the law unenforced, limiting the law’s real-world impact.

The licensing authority may revoke a dealer’s license⁸³ for not following the law, including for example:

- Selling guns at an unauthorized location (ex. not their store or a lawful gun show);
- Not checking for proof of the purchaser’s identity before transferring a firearm (unless the purchaser is personally known to the dealer);
- Failing to keep proper records of every firearm sold and retaining them for 20 years (in order to assist in tracing if any gun is recovered in a crime);
- Displaying handguns, short-barreled rifles, short-barreled shotguns where they can be readily seen from outside the premises; and

- Not storing firearms securely, but only in cases when the Pennsylvania State Police (“PSP”) declares a clear and present danger to public safety and the store is closed for business.⁸⁴

Gun dealers in Pennsylvania would also be subject to criminal penalties⁸⁵ if they:

- Knowingly or intentionally sell, deliver, or transfer a firearm under circumstances intended to provide a firearm to any person who is unqualified or ineligible to possess a firearm under Pennsylvania law;
- Deliver a firearm in violation of the requirements of Pennsylvania law and have reason to believe that the firearm is intended to be used in the commission of a crime or attempt to commit a crime;
- Sell a handgun, or short-barreled rifle or shotgun, without using an application/record of sale that contains the following question:

*Are you the actual buyer of the firearm(s). . . listed on this application/record of sale?
Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person, unless you are legitimately acquiring the firearm as a gift for any of the following individuals who are legally eligible to own a firearm: (1) spouse; (2) parent; (3) child; (4) grandparent; or (5) grandchild.*

Gun dealers are required to send the application/record of sale to PSP within 14 days of the sale and to retain one copy for a period of 20 years.⁸⁶

Both Pennsylvania and federal law require dealers to conduct background checks on purchasers according to specific procedures.⁸⁷ Federal law regulating dealers mirrors many of Pennsylvania’s other requirements.⁸⁸

Unfortunately, these Pennsylvania laws are not being utilized as designed to hold dealers accountable. Law enforcement should not wait until a disreputable dealer trafficks guns that are later used to take lives. State and local law enforcement must proactively ensure that dealers are following these laws before more lives are lost.

3. Inspections make Americans safer and reduce costs

Inspections in other industries have been shown to improve public health and safety and reduce the costs associated with negligence or willful misconduct. Over 40 years, regular workplace inspections and stronger federal standards have cut workplace deaths by approximately 65% even while the American workforce doubled.⁸⁹ Foodborne illnesses result in 3,000 deaths and \$75 billion in costs each year in the United States.⁹⁰ But when restaurants are regularly inspected, the likelihood of outbreaks and incidences of salmonella are reduced.⁹¹

Over the past 10 years, Pennsylvania’s rate of gun deaths has climbed. In addition to the incalculable psychological toll this loss of life has on families and communities, it also has a steep economic cost: Pennsylvania’s gun violence costs taxpayers an astonishing \$470.7 million each year.⁹²

As with workplace and food safety inspections, FFL inspections save lives. Saving lives also saves money. Investing in the solutions to gun violence have repeatedly been shown to produce extraordinarily high returns.⁹³

Since the vast majority of crime guns come from a small percentage of dealers, regular inspections of those high-risk dealers by state and local law enforcement can have a dramatic impact on deterring bad behavior and inducing good business practices that keep guns from getting to the streets. High-risk dealers are identified by having repeat violations or large numbers of crime guns traced to them. They are dealers who are known to have facilitated straw purchasers or conducted illegal sales, or have poor security systems and inventory control that have resulted in stolen, lost, or missing firearms. By prioritizing the inspections of high-risk dealers, law enforcement can make more economical use of public resources.

CASE STUDY

Island Firearms

In 2016 a firearm was recovered at a crime scene that should have been in inventory at the Pittsburgh dealer, Island Firearms. When contacted by ATF, the dealer was unaware that the gun was no longer in their store. This failed trace request triggered an inspection by ATF, the store's fourth in five years⁹⁴ — a rare occurrence since most dealers will not be inspected even once in a five year span.⁹⁵

The 2016 inspection found behavior and violations so egregious that the inspector wrote he had a “growing concern for public safety,” noting, “[...]here were a large number of firearms that were stored unsecured on the sales floor. There were four plastic tubs filled with handguns that were stored on the sales floor next to fishing supplies, and there were numerous long guns in boxes that were stored next to the handgun tubs. These firearms were readily accessible to customers, and as there are often several customers at a time in the store it would be very easy for someone to steal firearms from the licensee.”

The 2016 inspection found several repeat violations, including missing firearms and disorganized inventory, a failure to protect customer privacy, selling firearms to people who appear to be prohibited from owning firearms, and recordkeeping that had “deteriorated since the previous recall inspection” just 15 months prior. Finally, the inspector reported, the dealer “continues to have issues with” not reporting multiple handgun sales — gun dealers are legally required to report to ATF when a purchaser buys more than one handgun over a period of five business days in order to help ATF find and shut down trafficking rings — despite reassurances in past inspections that the dealer would do so. The inspector continued, “The licensee has failed to develop an internal control to assist him with identifying and reporting these types of sales.”⁹⁶

The results of these poor business practices speak for themselves: at least 313 crime guns came from Island Firearms between 1996 and 2023, including at least 50 in just 2022 and 2023.⁹⁷ Seven of these guns were recovered in homicide investigations.⁹⁸ Some of these guns were sold to straw purchasers, according to two indictments in 2018⁹⁹ and 2019¹⁰⁰ that name Island Firearms as the supplier.

The failure of ATF to revoke Island Firearm's license in 2016 not only endangered the public, it failed to improve the dealer's business practices. Instead, the owner's daughter obtained a new FFL under the name Neville Island Firearms and continues to operate the business at the same location¹⁰¹— thereby effectively wiping clean Island Firearms' spotty history of compliance with the law. Replacing its old license with a new one gives the store a clean slate in terms of compliance history.¹⁰²

Pennsylvania should strengthen dealer regulations to reduce gun trafficking and gun thefts from dealers in the state.

Seventeen states, including Pennsylvania, and the District of Columbia require dealers to get a state license,¹⁰³ but the standards imposed on dealers vary widely between the states. States with the strongest requirements have lower rates of gun trafficking, straw purchases, and stolen guns. According to a Brady analysis of 2023 ATF data,¹⁰⁴ New Jersey had the second-lowest rate of crime guns sourced from in-state dealers, while Pennsylvania had the 19th lowest. The strength of New Jersey's gun dealer regulations compared with Pennsylvania's likely explains this difference.

Many states have imposed stronger regulations of gun dealers than Pennsylvania, including New Jersey. Some of the policies most likely to reduce gun trafficking and the theft of guns from dealers that Pennsylvania could adopt are:

STATE LAW	NEW JERSEY	PENNSYLVANIA
STATE LICENSE	REQUIRED ¹⁰⁵	REQUIRED ¹⁰⁶
GUN STORE EMPLOYEE BACKGROUND CHECKS	REQUIRED ¹⁰⁷	NOT REQUIRED
MINIMUM AGE TO WORK AT GUN STORE	YES - 18 ¹⁰⁸	NO
PURCHASER RECORDS SENT TO STATE AND LOCAL LAW ENFORCEMENT	REQUIRED FOR ALL FIREARMS ¹⁰⁹	REQUIRED FOR ONLY SOME FIREARMS ¹¹⁰
SECURITY SYSTEM APPROVED BY STATE LAW	REQUIRED ¹¹¹	NOT REQUIRED
DEALER INSPECTIONS BY STATE OR LOCAL LAW ENFORCEMENT	ALLOWED BUT NOT REQUIRED ¹¹²	ALLOWED BUT NOT REQUIRED ¹¹³

1. Employee background checks

Neither federal nor Pennsylvania law requires gun store employees to be subject to background checks before selling firearms. Even the gun industry's trade association, the National Shooting Sports Foundation (NSSF), has agreed that background checks are necessary: it has advised its members to conduct background checks on anyone who will have actual (e.g., handling a firearm) or constructive (e.g., having the keys to the safe where the firearms are stored) possession of firearms. Specifically, NSSF's website states:

*Companies do have an obligation to learn as much as they can[,] and are legally entitled to[,] about the candidates they are evaluating for hire. In fact, it is a business' duty to ensure a potential hire does not have an adverse history that could potentially harm a business or pose a safety risk to employees and clients.*¹¹⁴

NSSF is right about this—dealers have an obligation to ensure they are not allowing someone deemed too dangerous or untrustworthy to purchase or possess firearms to sell or have access to large quantities of them.

While both federal and Pennsylvania law require background checks for gun store owners, it fails to do so for the employees who handle large quantities of guns and ammunition. At least 10 states already have addressed this public safety issue by requiring background checks of gun dealer employees.¹¹⁵ Pennsylvania should join these states by requiring gun dealers' employees to be subject to background checks.

2. Require gun dealers to keep electronic records of all gun sales and send them to state and local law enforcement

Electronic sales records allow law enforcement to quickly and efficiently trace a firearm after it is used in a crime. The faster law enforcement can trace a firearm, the faster they can solve gun crimes and uncover gun trafficking. When records are kept electronically, there is less likelihood of errors than with handwritten records and law enforcement can more easily identify patterns associated with gun trafficking. Electronic records that are sent to law enforcement are also more secure than paper records which can be lost, stolen, or damaged. Electronic records can also allow gun dealers to more easily search their records for suspicious patterns and purchasers, potentially stopping guns from ending up in the wrong hands in the first place.

Pennsylvania requires handgun and certain other gun sale records to be transmitted to the Pennsylvania State Police within 14 days of the sale.¹¹⁶ Rifle and shotgun sales do not have to be reported. Although not required, the state has developed a system to allow dealers to transmit those records electronically though no data is available for how many dealers utilize the system.¹¹⁷

Five states and the District of Columbia require all firearm sales to be transmitted to law enforcement.¹¹⁸ In order to facilitate the fast and effective tracking of crime guns and identification of patterns of gun trafficking, Pennsylvania should require all gun sale records to be sent to law enforcement electronically.

3. FFLs and their employees must be trained to identify illegal activity

According to the ATF, “[g]un retailers can significantly reduce the risk of straw purchasing at their store . . . Educating employees to recognize and respond to red flags indicating a possible straw purchase are key.”¹¹⁹ Businesses that pose unique risks to public safety are often required to train their staff to prevent illegal activity. For example, in Pennsylvania, people who sell or serve alcohol are required to take training to prevent service of alcohol to minors and to visibly intoxicated persons.¹²⁰ Gun sellers should, similarly, be required to take training to prevent illegal sales.

In its Code of Conduct for responsible gun dealers, Brady recommends that FFLs take the following steps to prevent straw purchases:¹²¹

- Screening for indicators of straw purchases and firearms trafficking. Measures include but are not limited to: 1) asking questions of all prospective purchasers to determine if they are a legitimate, responsible purchaser; 2) asking all prospective purchasers if they have or will obtain sufficient training and knowledge of the firearm(s); and 3) asking all prospective purchasers whether they intend to provide the firearm to someone other than the prospective purchaser.
- Maintaining and reviewing requests received from any federal, state, or local law enforcement agency concerning guns later traced to crime. Identifying the names of purchasers that bought a gun later traced to crime and identifying any patterns in sales of guns later traced to crime may help you expand your best practices to avoid similar sales in the future.
- Ensuring that the name on the method of payment matches the name of the prospective purchaser (if a name is provided on the method of payment, such as credit card).
- In the case of transfers of firearms that were purchased over the internet, the telephone, or by other electronic means, ensuring that the person who ordered and paid for the firearm is the same person who completes the transfer in person.
- Prohibiting dealer personnel from directing a customer as to how to answer questions or forms required to be completed in connection with the sale.
- Limiting purchases of firearms to one per 30 days per civilian, non-law enforcement customer.

Several states have enacted laws requiring gun dealers and their employees to undergo training to identify and prevent illegal sales like straw purchases, including most recently in Colorado.¹²² To ensure that gun dealers are not negligently or unwittingly facilitating illegal sales, Pennsylvania should require its dealers to be trained to spot such illegal activity.

4. Store Security

Pennsylvania State Senators Frank Farry, Tracy Pennycuik, and Joe Picozzi have acknowledged the risk guns stolen from dealers pose to Pennsylvanians: “Many communities in our Commonwealth have had to deal with gun store [burglaries that] typically spawn further crime as the stolen weapons are used to threaten, hurt, or murder others as well as to support other criminal operations.”¹²³ Between 2020 and 2024, Pennsylvania dealers reported 4,502 firearms lost or stolen from their inventories.¹²⁴

Many, if not most, gun store thefts occur when the business is closed. Perpetrators break storefront glass with guns, cars, or other tools to gain entry. As many gun stores keep their inventory in glass cases overnight, it takes only seconds for perpetrators to break the glass cases and gather up dozens of unsecured firearms.

A sampling of recent incidents at Pennsylvania gun stores demonstrate this:

- **June 2025:** Individuals threw a brick through the window of National Range and Armory, Williamsport, at around 5:21 a.m., entered, and fled with multiple firearms.¹²⁵
- **March 2025:** At approximately 4:30 a.m., individuals shot through the window of Allegheny Arms and Gun Works in Bethel Park, where guns are stored in glass display counters. Within 45 seconds, the individuals were able to grab 56 guns and an armful of ammunition.¹²⁶
- **Late December 2024:** On Christmas Day, individuals crashed their car into the front of Operation Freedom Firearms in Muncy, breaking the doors and front wall to gain access, and stealing five handguns.¹²⁷
- **Mid December 2024:** At around 11:30 p.m., two individuals broke the front window of Tall Tales Sporting Goods in Pine Grove, after disabling electrical wires. They stole five AR rifles.¹²⁸

In 2017, the Tampa Bay Times concluded an 18-month investigation into gun store burglaries and found that “[w]eak security practices at many gun stores have made commercial burglaries an increasingly significant source of weapons for criminals in Florida and beyond.”¹²⁹ Furthermore, gun dealers “are fueling a black market of firearms for people who can’t get them legally. They can resurface in violent crimes or end up in the hands of [people] convicted [of] felon[ies].”¹³⁰

Pennsylvania does not require dealers to secure their firearms unless the PSP Commissioner declares a “clear and present danger” in that area or the state as a whole — however, this has never happened.¹³¹ Colorado,¹³² New Jersey,¹³³ New York,¹³⁴ and several other states require gun dealers to take steps to prevent the easy theft of guns and ammunition after hours.

Minnesota, for example, specifically requires dealers who display no more than 50 handguns for sale at any time to secure all handguns in a locked safe, locked steel gun cabinet, or on a locked, steel cable that runs through the handgun’s trigger guards after business hours.¹³⁵ The safe, gun cabinet, rod, or cable must be anchored to prevent its removal from the premises. In addition, the Minnesota Commissioner of Public Safety has developed further standards for gun dealer security. Larger dealers must:¹³⁶

- Install vehicle-resistant barriers to prevent the penetration of the dealer’s place of business by a motor vehicle. The barriers must protect any areas that are accessible to vehicles and that have a free run distance of 50 feet or more.
- Secure each perimeter doorway by using:
 - A windowless steel security door equipped with both a dead bolt and a doorknob lock.
 - A windowed metal door that is equipped with both a dead bolt and a doorknob lock. The window must be made of one-half inch polycarbonate or glass reinforced with metal mesh. If the window has an opening of five inches or more measured in any direction, then the window must be covered with steel bars or metal grating¹³⁷ affixed to the interior of the door.
 - A metal grate that is padlocked and affixed to the premises independent of the door and door frame.
- Cover all windows with steel bars that are anchored internally to the wall joists.

- Secure a room where pistols are stored after hours with a locked steel door or metal grating.
- Not display pistols within four feet of a window unless the window is covered by metal screen that is anchored internally to the wall joists.
- Secure heating, ventilating, air conditioning, and service openings with steel bars, metal grating, or an alarm system as described.
- Illuminate each perimeter doorway so that the doorway is clearly visible after dark from a distance of 100 feet.

While gun dealers may have insurance that compensates them in the event that their store is burglarized and inventory is stolen, the people who are victims of the stolen guns do not have such recourse. The state has a public safety responsibility to its residents and that responsibility entails requiring businesses that sell highly valuable deadly weapons to secure their premises and inventory. Like Minnesota and the other states that require dealers to securely store their inventory when the business is closed, Pennsylvania should develop and adopt similar standards.

CASE STUDY

Sportsman’s Supply Company

One Pittsburgh-area gun store sold more than 2,600 guns “off the books” in just four months in 2020. Grant Williams, the then-owner of Sportsman’s Supply Company in Butler pleaded guilty for making these dangerous gun sales after ATF tried to trace firearms from his inventory that did not have a record of sale, prohibiting the agency from completing the trace and inhibiting law enforcement investigations. After auditing the store’s records, ATF discovered he had sold 2,636 guns from May - August 2022 without recording any information regarding the sales as required by federal and state law. Grant Williams was sentenced to 45 days in prison followed by a year of supervised release and fined \$400,000.¹³⁸ Off-the-books sales are often an attempt to traffic firearms. Frequent, regular inspections can prevent this behavior by ensuring a dealer’s inventory matches its sales records.



CONCLUSION

Licensed firearms dealers are a significant source of the guns that have been used to rob Pennsylvanians of their lives. But for far too long, these dealers have operated with little oversight and scrutiny, and have gone relatively unchecked by federal, state, and local authorities. It's time for this to change and for the gun industry to be treated like other industries where inspections improve public health or safety. There is no sensible argument for why people serving alcohol must be trained to prevent underage sales but people selling guns should not be trained to prevent illegal sales. Just like restaurants in Pennsylvania are routinely inspected to prevent foodborne illnesses,¹³⁹ gun dealers should be inspected to prevent gun trafficking. This should not be a matter of debate or partisan politics.

Pennsylvania law enforcement and lawmakers have a responsibility to the communities they serve to ensure that only law-abiding, responsible people are selling guns. For state and local law enforcement, this means conducting regular inspections of dealers. For lawmakers, it means directing funding to conduct those inspections and continuing to pass public safety laws that subject gun sellers in the Commonwealth to the highest public safety standards.

The causes of and solutions to gun violence are complex but the solution here is not. Gun dealers must be held to the same standards to which our society holds similar businesses. By doing so, Pennsylvania can make great strides in removing a significant source of illegal guns and preventable deaths, and make all residents safer.

END NOTES

1. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2024, December 9). Firearms trace data: Pennsylvania – 2023. U.S. Department of Justice. Retrieved July 1, 2025, from <https://www.atf.gov/resource-center/firearms-trace-data-pennsylvania-2023>
2. Office of the Inspector General. (2023). Audit of the Bureau of Alcohol, Tobacco, Firearms and Explosives' risk-based inspection selection processes and administrative actions issued to federal firearms licensees. Retrieved June 11, 2024, from https://oig.justice.gov/sites/default/files/reports/23-062_0.pdf.
3. In CY2024, 193 inspections were done of PA FFLs: Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, January). Firearms compliance inspection results. U.S. Department of Justice. Retrieved January 2, 2025, from <https://www.atf.gov/firearms/firearms-compliance-inspection-results>. In January 2024, there were 3,226 active federally licensed retail sellers in Pennsylvania (Types 01, 02, 07, and 08): Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025). Federal Firearms Listings. ATF.gov. Retrieved January 2, 2025, from <https://www.atf.gov/firearms/listing-federal-firearms-licensees>. The Philadelphia ATF field division covers all of Pennsylvania, see: Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, April 24). ATF field divisions. U.S. Department of Justice. Retrieved from <https://www.atf.gov/contact/locations/atf-field-divisions>
4. Anderson, M. (2025, July 2). Trump administration targets ATF, with plans to cut jobs and ease gun restrictions. NPR. Retrieved July 5, 2025, from <https://www.npr.org/2025/07/02/nx-s1-5440343/trump-administration-atf-jobs-gun-restrictions>.
5. Schmidt v. Paris, No. 281 M.D. 2023, slip op. at ___ (Pa. Commw. Ct. Aug. 7, 2025).
6. Commonwealth of Pennsylvania, Department of Agriculture. (n.d.). Retail food inspection reports. Retrieved August 1, 2025, from <https://www.pa.gov/agencies/pda/food/food-safety/retail-food-inspection-reports>
7. Centers for Disease Control and Prevention. (2024, March 20). Inspection practices and outbreak rates. Retrieved August 5, 2025, from <https://www.cdc.gov/restaurant-food-safety/php/practices/outbreak-rates.html>
8. Webster, D.W., Vernick, J.S. & Bulzacchelli, M.T. Effects of State-Level Firearm Seller Accountability Policies on Firearm Trafficking. J Urban Health 86, 525–537 (2009). <https://doi.org/10.1007/s11524-009-9351-x>
9. Brady. (2022, April). Uncovering the truth about Pennsylvania crime guns: A report on trace data analysis. Retrieved June 30, 2025, from <https://brady-static.s3.amazonaws.com/Pennsylvania-Crime-Guns-Trace-Report.pdf>
10. Office of the Attorney General of Pennsylvania. (2021). Pennsylvania gun tracing analytics platform [Data set]. Retrieved August 1, 2021, from <https://www.attorneygeneral.gov/gunviolence/pennsylvania-gun-tracing-analytics-platform/>
11. Office of the Attorney General of Pennsylvania. (2021). Pennsylvania gun tracing analytics platform [Data set]. Retrieved August 1, 2021, from <https://www.attorneygeneral.gov/gunviolence/pennsylvania-gun-tracing-analytics-platform/>
12. NBC10 Philadelphia. (2019, October 31). “No Way We Can Know”: Philadelphia gun dealer sold shotgun to suspect in family’s killing. NBC10 Philadelphia. <https://www.nbcphiladelphia.com/news/national-international/philadelphia-gun-dealer-sold-shotgun-family-killed-maurice-louis/>
13. NBC10 Philadelphia. (2019, October 31). “No Way We Can Know”: Philadelphia gun dealer sold shotgun to suspect in family’s killing. NBC10 Philadelphia. <https://www.nbcphiladelphia.com/news/national-international/philadelphia-gun-dealer-sold-shotgun-family-killed-maurice-louis/>
14. Brady United. (n.d.). 2016 Inspection Report for Locks. Gun Store Transparency Project. <https://gunstoretransparency.org/sites/default/files/reports/NYC88147200000002.010.pdf>
15. Brady United. (n.d.). 2016 Inspection Report for Locks. Gun Store Transparency Project. <https://gunstoretransparency.org/sites/default/files/reports/NYC88147200000002.010.pdf>
16. Brady United. (n.d.). 2016 Inspection Report for Locks. Gun Store Transparency Project. <https://gunstoretransparency.org/sites/default/files/reports/NYC88147200000002.010.pdf>
17. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2021, June). Safety and security information for Federal Firearms Licensees (ATF P 3317.2). Retrieved August 1, 2025, from <https://www.atf.gov/firearms/docs/guide/safety-and-security-information-federal-firearms-licensees-atf-p-33172/download>
18. Brady. (n.d.). 2016 Inspection Report for Locks. Gun Store Transparency Project. <https://gunstoretransparency.org/sites/default/files/reports/NYC88147200000002.010.pdf>
19. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, January 16). Enhanced Regulatory Enforcement Policy. ATF.gov. <https://web.archive.org/web/20250210162338/https://www.atf.gov/rules-and-regulations/enhanced-regulatory-enforcement-policy> accessed February 10 2025.
20. The most recent national data is from this 2000 report. ATF has not released this kind of data since the turn on the millennium. See: Bureau of Alcohol, Tobacco, and Firearms. (2000, February). Commerce in Firearms in the United States. U. S. Department of Justice.
21. Brady. (2022, April). Uncovering the truth about Pennsylvania crime guns: A report on trace data analysis. Retrieved June 30, 2025, from <https://brady-static.s3.amazonaws.com/Pennsylvania-Crime-Guns-Trace-Report.pdf>
22. <https://onlinelibrary.wiley.com/doi/full/10.1111/1745-9133.12621>.
23. Irvin, N., Rhodes, K., Cheney, R., & Wiebe, D. (2014). Evaluating the effect of state regulation of federally licensed firearm dealers on firearm homicide. American journal of

public health, 104(8), 1384–1386. <https://doi.org/10.2105/AJPH.2014.301999>

24. 18 U.S.C. § 923(g)(1)(B).

25. In January 2024, there were 3,226 active federally licensed retail sellers in Pennsylvania (Types 01, 02, 07, and 08): Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025). Federal Firearms Listings. ATF.gov. Retrieved January 2, 2025, from <https://www.atf.gov/firearms/listing-federal-firearms-licensees>.

26. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, January). Firearms compliance inspection results. U.S. Department of Justice. Retrieved January 2, 2025, from <https://www.atf.gov/firearms/firearms-compliance-inspection-results>

27. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2014, May). Facts and figures for fiscal year 2013. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2015, February). Facts and figures for fiscal year 2014. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2016, March). Facts and figures for fiscal year 2015. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2017, March). Facts and figures for fiscal year 2016. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2018, May). Facts and figures for fiscal year 2017. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2019, May). Facts and figures for fiscal year 2018. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2020, June). Facts and figures for fiscal year 2019. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2021, April). Facts and figures for fiscal year 2020. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2022, August). Facts and figures for fiscal year 2021. U.S. Department of Justice.

28. The so-called “Zero Tolerance” policy went into effect for ATF in July 2021, which is 75% of the way through FY2021 (see Bureau of Alcohol, Tobacco, and Firearms. (2025, January). NFCTA: Crime Guns - Volume Four Part I. U.S. Department of Justice. Retrieved June 11, 2025, from <https://www.atf.gov/file/200516/download>.). Comparisons used were ATF, Fact Sheets - Facts and Figures for Fiscal Years 2013–2021 compared to Fiscal Year 2024. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2014, May). Facts and figures for fiscal year 2013. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2015, February). Facts and figures for fiscal year 2014. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2016, March). Facts and figures for fiscal year 2015. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2017, March). Facts and figures for fiscal year 2016. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2018, May). Facts and figures for fiscal year 2017. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2019, May). Facts and figures for fiscal year 2018. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2020, June). Facts and figures for fiscal year 2019. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2021, April). Facts and figures for fiscal year 2020. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2022, August). Facts

and figures for fiscal year 2021. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, March). Facts and figures for fiscal year 2024. U.S. Department of Justice. Retrieved May 3, 2025 from <https://www.atf.gov/resource-center/fact-sheet/fact-sheet-facts-and-figures-fiscal-year-2024>

29. Also includes dealers that surrendered their license in lieu of revocation. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, January 16). Enhanced Regulatory Enforcement Policy. ATF.gov. Retrieved February 10 2025 from <https://web.archive.org/web/20250210162338/https://www.atf.gov/rules-and-regulations/enhanced-regulatory-enforcement-policy>

30. Brownlee, C., & Barton, C. (2025, April 7). Trump administration ends zero-tolerance policy for lawbreaking gun dealers. The Trace. Retrieved August 1, 2025, from <https://www.thetrace.org/2025/04/atf-bondi-gun-store-license-biden-policy/>

31. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, May 21). Protecting Second Amendment rights. U.S. Department of Justice. Retrieved August 1, 2025, from <https://www.atf.gov/firearms/protecting-second-amendment-rights>

32. Daniel W. Webster et al., Effects of State-Level Firearm Seller Accountability Policies on Firearms Trafficking, 86 J. URB. H. 525 (Jul. 2009). <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2704273/>.

33. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2023). Pennsylvania June 2025 Federal Firearms Listings. ATF.gov. <https://www.atf.gov/file/202631/download>. (Note that type 03 FFLs, which are collectors, are not included in this count.)

34. ATF Active FFL listings from April 2025. See: Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025). Federal Firearms Listings. ATF.gov. <https://www.atf.gov/firearms/listing-federal-firearms-licensees>.

35. Pennsylvania State Police, (2024). Firearms Annual Report 2023 [Report]. Commonwealth of Pennsylvania. Retrieved from https://www.pa.gov/content/dam/copapwp-pagov/en/psp/documents/firearms/psp_2023_firearms_annual_report.pdf

36. Pennsylvania State Police, (2024). Firearms Annual Report 2023 [Report]. Commonwealth of Pennsylvania. Retrieved from https://www.pa.gov/content/dam/copapwp-pagov/en/psp/documents/firearms/psp_2023_firearms_annual_report.pdf.; Pennsylvania State Police, (2023). Firearms Annual Report 2022 [Report]. Commonwealth of Pennsylvania. Retrieved from https://www.pa.gov/content/dam/copapwp-pagov/en/psp/documents/firearms/Pennsylvania_State_Police_2022_Firearms_Annual_Report.pdf.; Pennsylvania State Police, (2022). Firearms Annual Report 2021 [Report]. Commonwealth of Pennsylvania. Retrieved from https://www.pa.gov/content/dam/copapwp-pagov/en/psp/documents/firearms/Pennsylvania_State_Police_2021_Firearms_Annual_Report.pdf.; Pennsylvania State Police, (2021). Firearms Annual Report 2020 [Report]. Commonwealth of Pennsylvania. Retrieved from https://www.pa.gov/content/dam/copapwp-pagov/en/psp/documents/firearms/Pennsylvania_State_Police_2020_Firearms_Annual_Report.pdf.; and

- Pennsylvania State Police, (2020). Firearms Annual Report 2019 [Report]. Commonwealth of Pennsylvania. Retrieved from https://www.pa.gov/content/dam/copapwp-pagov/en/psp/documents/firearms/Pennsylvania_State_Police_2019_Firearms_Annual_Report.pdf
37. Bureau of Alcohol, Tobacco, and Firearms. (2025, January). NFCTA: Crime Guns - Volume Four Part I. U.S. Department of Justice. Retrieved June 11, 2025, from <https://www.atf.gov/file/200516/download>.
38. Pennsylvania State Police, (2024). Firearms Annual Report 2023 [Report]. Commonwealth of Pennsylvania. Retrieved from https://www.pa.gov/content/dam/copapwp-pagov/en/psp/documents/firearms/psp_2023_firearms_annual_report.pdf
39. Pennsylvania State Police, (2024). Firearms Annual Report 2023 [Report]. Commonwealth of Pennsylvania. Retrieved from https://www.pa.gov/content/dam/copapwp-pagov/en/psp/documents/firearms/psp_2023_firearms_annual_report.pdf
40. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2024, December 9). Firearms trace data: Pennsylvania – 2023. U.S. Department of Justice. Retrieved July 1, 2025, from <https://www.atf.gov/resource-center/firearms-trace-data-pennsylvania-2023>
41. Brady (2025, June 25). The Suppliers of America's Gun Violence Epidemic. Retrieved July 5, 2025, from <https://www.bradyunited.org/resources/research/suppliers-americas-gun-violence-epidemic>. Note: The Demand Letter 2 program is focused on short TTC guns; there may be other dealers who sold large amounts of crime guns who are not in the program because the guns were first sold three or more years earlier, or dealers that did sell that many but were not in the DL2 program due to their license type not being eligible for the program.
42. For a complete list of dealers in the Demand 2 program from 2022-24, see: Brady (2025, June 25). The Suppliers of America's Gun Violence Epidemic. Retrieved July 5, 2025, from <https://www.bradyunited.org/resources/research/suppliers-americas-gun-violence-epidemic>.
43. Office of Attorney General, Commonwealth of Pennsylvania. (2019, July 11). AG Shapiro launches Track + Trace initiative targeting gun violence in Pennsylvania. Pennsylvania Office of Attorney General. <https://web.archive.org/web/20211027220220/https://www.attorneygeneral.gov/taking-action/press-releases/ag-shapiro-launches-track-trace-initiative-targeting-gun-violence-in-pennsylvania/>
44. Office of the Attorney General of Pennsylvania. (2021). Pennsylvania gun tracing analytics platform [Data set]. Retrieved August 1, 2021, from <https://www.attorneygeneral.gov/gunviolence/pennsylvania-gun-tracing-analytics-platform/>
45. Brady. (2022, April). Uncovering the truth about Pennsylvania crime guns: A report on trace data analysis. Retrieved June 30, 2025, from <https://brady-static.s3.amazonaws.com/Pennsylvania-Crime-Guns-Trace-Report.pdf>
46. Brady. (2022, April). Uncovering the truth about Pennsylvania crime guns: A report on trace data analysis. Retrieved June 30, 2025, from <https://brady-static.s3.amazonaws.com/Pennsylvania-Crime-Guns-Trace-Report.pdf>
47. Brady. (2022, April). Uncovering the truth about Pennsylvania crime guns: A report on trace data analysis. Retrieved June 30, 2025, from <https://brady-static.s3.amazonaws.com/Pennsylvania-Crime-Guns-Trace-Report.pdf>
48. Brady. (2022, April). Uncovering the truth about Pennsylvania crime guns: A report on trace data analysis. Retrieved June 30, 2025, from <https://brady-static.s3.amazonaws.com/Pennsylvania-Crime-Guns-Trace-Report.pdf>
49. The most recent national data is from this 2000 report. ATF has not released this kind of data since the turn on the millennium. See: Bureau of Alcohol, Tobacco, and Firearms. (2000, February). Commerce in Firearms in the United States. U. S. Department of Justice.
50. Brady. (2022, April). Uncovering the truth about Pennsylvania crime guns: A report on trace data analysis. Retrieved June 30, 2025, from <https://brady-static.s3.amazonaws.com/Pennsylvania-Crime-Guns-Trace-Report.pdf>
51. Bureau of Alcohol, Tobacco, and Firearms. (2000). ATF Report to the Secretary of the Treasury on Firearms Initiative.
52. Wintemute G. J. (2009). Disproportionate sales of crime guns among licensed handgun retailers in the United States: a case-control study. *Injury prevention: Journal of the International Society for Child and Adolescent Injury Prevention*, 15(5), 291–299. <https://doi.org/10.1136/ip.2007.017301>
53. See both: Vernick, J. S., & Webster, D. W. (2013). Curtailing dangerous sales practices by licensed firearm dealers: Legal opportunities and obstacles. In D. W. Webster & J. S. Vernick (Eds.), *Reducing gun violence in America: Informing policy with evidence and analysis* (pp. 133–140). Johns Hopkins University Press.; Webster, D. W., & Vernick, J. S. (2013). Spurring responsible firearms sales practices through litigation: The impact of New York City's lawsuits against gun dealers on interstate gun trafficking. In *Reducing Gun Violence in America: Informing Policy with Evidence and Analysis* (pp. 123-131). Johns Hopkins University Press.
54. Webster, D. W., & Vernick, J. S. (2013). Spurring responsible firearms sales practices through litigation: The impact of New York City's lawsuits against gun dealers on interstate gun trafficking. In D. W. Webster & J. S. Vernick (Eds.), *Reducing gun violence in America: Informing policy with evidence and analysis* (pp. 123–132). Johns Hopkins University Press.
55. Sorenson, S. B., & Vittes, K. A. (2003). Buying a handgun for someone else: firearm dealer willingness to sell. *Injury prevention: journal of the International Society for Child and Adolescent Injury Prevention*, 9(2), 147–150. <https://doi.org/10.1136/ip.9.2.147>
56. Wintemute G. J. (2010). Firearm retailers' willingness to participate in an illegal gun purchase. *Journal of Urban Health: bulletin of the New York Academy of Medicine*, 87(5), 865–878. <https://doi.org/10.1007/s11524-010-9489-6>; Sorenson, S. B., & Vittes, K. A. (2003). Buying a handgun for someone else:

firearm dealer willingness to sell. *Injury prevention : journal of the International Society for Child and Adolescent Injury Prevention*, 9(2), 147–150. <https://doi.org/10.1136/ip.9.2.147>

57. Pierce, G. L., Briggs, L., & Carlson, D. A. (1995). *The Identification of Patterns in Firearms Trafficking: Implications for Focused Enforcement Strategy*. Northeastern University. Retrieved from https://www.researchgate.net/publication/343162281_THE_IDENTIFICATION_OF_PATTERNS_IN_FIREARMS_TRAFFICKING_IMPLICATIONS_FOR_FOCUSED_ENFORCEMENT_STRATEGIES

58. Bureau of Alcohol, Tobacco and Firearms. (1999, February). *General Findings: Local Illegal Firearms Markets*. Youth Crime Gun Interdiction Initiative. Retrieved March 2023, from <https://www.atf.gov/resource-center/docs/ycgiii-report-1998-general-findingspdf-0/download>.

59. Bureau of Alcohol, Tobacco, and Firearms. (2025, January). *NFCTA: Crime Guns - Volume Four Part III*. U.S. Department of Justice. Retrieved June 11, 2025, from <https://www.atf.gov/firearms/docs/report/nfcta-volume-iv-part-iii-%E2%80%93-crime-gun-tracing-updates-and-new-analysis/download>

60. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2024). *Time-to-Crime - Firearms Recovered and Traced in the United States and Territories (xcl)* [Data set]. ATF. <https://www.atf.gov/resource-center/firearms-trace-data-2023>.

61. Brady. (2022, April). *Uncovering the truth about Pennsylvania crime guns: A report on trace data analysis*. Retrieved June 30, 2025, from <https://brady-static.s3.amazonaws.com/Pennsylvania-Crime-Guns-Trace-Report.pdf>

62. Bureau of Alcohol, Tobacco, and Firearms. (2023). *NFCTA: Crime Guns - Volume Two, Pennsylvania Supplemental Report*. Retrieved June 3, 2025, from <https://www.atf.gov/firearms/docs/report/pennsylvania-state-report/download>

63. Bureau of Alcohol, Tobacco, and Firearms. (2023). *NFCTA: Crime Guns - Volume Two, Pennsylvania Supplemental Report*. Retrieved June 3, 2025, from <https://www.atf.gov/firearms/docs/report/pennsylvania-state-report/download>

64. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2024, December 9). *Time-to-Crime - Firearms Sourced and Recovered in the United States and Territories (xcl)* [Data set]. ATF. Retrieved July 15, 2025 from <https://www.atf.gov/resource-center/firearms-trace-data-2023>

65. The statute for straw purchasing is 18 Pa.C.S. §6111(g)(4); see also: Pennsylvania State Police, (2024). *Firearms Annual Report 2023* [Report]. Commonwealth of Pennsylvania. Retrieved from https://www.pa.gov/content/dam/copapwp-pagov/en/psp/documents/firearms/psp_2023_firearms_annual_report.pdf

66. Stansfield, R., Semenza, D. C., Xu, J., & Griffiths, E. (2023). *Licensed firearm dealers, legal compliance, and local homicide: A case study*. *Criminology & Public Policy*, 22(2), 323–345. <https://doi.org/10.1111/1745-9133.12621>

67. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2022, March). *Fiscal year 2023: Congressional budget submission*. U.S. Department of Justice. https://web.archive.org/web/20241104205422/https://www.justice.gov/d9/pages/attachments/2022/04/13/atf_fy_2023_presidents_budget_narrative_-_final_4-5-22.pdf.

68. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2014, May). *Facts and figures for fiscal year 2013*. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2015, February). *Facts and figures for fiscal year 2014*. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2016, March). *Facts and figures for fiscal year 2015*. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2017, March). *Facts and figures for fiscal year 2016*. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2018, May). *Facts and figures for fiscal year 2017*. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2019, May). *Facts and figures for fiscal year 2018*. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2020, June). *Facts and figures for fiscal year 2019*. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2021, April). *Facts and figures for fiscal year 2020*. U.S. Department of Justice.; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2022, August). *Facts and figures for fiscal year 2021*. U.S. Department of Justice.

69. Anderson, M. (2025, July 2). *Trump administration targets ATF, with plans to cut jobs and ease gun restrictions*. NPR. Retrieved July 5, 2025, from <https://www.npr.org/2025/07/02/nx-s1-5440343/trump-administration-atf-jobs-gun-restrictions>.

70. See both: Freskos, B., Nass, D., Stephens, A., & Penzenstadler, N. (2021, May 26). *Gun dealers let off hook when ATF inspections find violations*. USA Today. Retrieved August 1, 2025, from <https://www.usatoday.com/in-depth/news/investigations/2021/05/26/gun-dealers-let-off-hook-when-atf-inspections-find-violations/7210266002/>.; Wilson, N. (2025, July 9). *The Trump administration's budget will undermine ATF's efforts to prevent violent crime*. Center for American Progress. Retrieved August 6, 2025, from <https://www.americanprogress.org/article/the-trump-administrations-budget-will-undermine-atfs-efforts-to-prevent-violent-crime/>

71. Office of the Inspector General. (2023). *Audit of the Bureau of Alcohol, Tobacco, Firearms and Explosives' risk-based inspection selection processes and administrative actions issued to federal firearms licensees*. Retrieved June 11, 2024, from https://oig.justice.gov/sites/default/files/reports/23-062_0.pdf.

72. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, January). *Firearms compliance inspection results*. U.S. Department of Justice. Retrieved January 2, 2025, from <https://www.atf.gov/firearms/firearms-compliance-inspection-results>

73. In January 2024, there were 3,226 active federally licensed retail dealers in Pennsylvania (Types 01, 02, 07, and 08): Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025). *Federal Firearms Listings*. ATF.gov. Retrieved January 2, 2025, from <https://www.atf.gov/firearms/listing-federal-firearms-licensees>.

74. Barton, C. (2024, October 23). ATF steps up policing of lawbreaking gun dealers, revoking highest number of licenses in two decades [Updated January 17, 2025]. The Trace. Retrieved June 1, 2025, from <https://www.thetrace.org/2024/10/atf-gun-dealer-licenses-revoked-biden/>; Also, the Philadelphia ATF field division covers all of Pennsylvania, see: Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, April 24). ATF field divisions. U.S. Department of Justice. Retrieved from <https://www.atf.gov/contact/locations/atf-field-divisions>
75. In CY2024, 193 inspections were done of PA FFLs: Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, January). Firearms compliance inspection results. U.S. Department of Justice. Retrieved January 2, 2025, from <https://www.atf.gov/firearms/firearms-compliance-inspection-results>. In January 2024, there were 3,226 active federally licensed retail sellers in Pennsylvania (Types 01, 02, 07, and 08): Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025). Federal Firearms Listings. ATF.gov. Retrieved January 2, 2025, from <https://www.atf.gov/firearms/listing-federal-firearms-licensees>. The Philadelphia ATF field division covers all of Pennsylvania, see: Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, April 24). ATF field divisions. U.S. Department of Justice. Retrieved from <https://www.atf.gov/contact/locations/atf-field-divisions>
76. Anderson, M. (2025, July 2). Trump administration targets ATF, with plans to cut jobs and ease gun restrictions. NPR. Retrieved July 5, 2025, from <https://www.npr.org/2025/07/02/nx-s1-5440343/trump-administration-atf-jobs-gun-restrictions>.
77. Schmidt v. Paris, No. 281 M.D. 2023, slip op. at ___ (Pa. Commw. Ct. Aug. 7, 2025). The court was clear that the Montgomery sheriff, as well as other state and certain local law enforcement, has the authority to inspect gun dealers who are licensed by the state for compliance with the law, although it enjoined the sheriff's announced inspection policy for using overly broad language that can be simply rectified.
78. Id. at p. 13.
79. City of Chicago, Office of the Mayor; & Chicago Police Department. (2017). Gun trace report 2017. Retrieved from <https://www.chicago.gov/content/dam/city/depts/mayor/Press%20Room/Press%20Releases/2017/October/GTR2017.pdf>.
80. 37 Pa. Code § 33.116(a).
81. 18 Pa.C.S. § 6113.
82. 37 Pa. Code § 33.116(c).
83. 37 Pa. Code § 33.119.
84. 18 Pa.C.S. § 6113.; No information found online as of July 30, 2025 of the PSP Commissioner ever declaring "a clear and present danger to public safety," and such would be required to done "through public announcements through the news media" (31 Pa. Code § 31.105)
85. 18 Pa.C.S. § 6111. Note that these provisions have rarely been enforced.
86. 18 Pa.C.S. § 6111.
87. 18 Pa.C.S. § 6111.
88. 18 USCS § 923.
89. 29 U.S.C. § 657; Safety and Health Magazine. (2011, February 17). Timeline chronicles 40 years of OSHA. Retrieved August 5, 2025, from <https://www.safetyandhealthmagazine.com/articles/timeline-chronicles-40-years-of-osha-2>
90. Centers for Disease Control and Prevention. (2018, November 5): Burden of foodborne illness, overview. Retrieved August 5, 2025, from https://archive.cdc.gov/www_cdc_gov/foodborneburden/estimates-overview.html; Hoffmann, S., White, A. E., McQueen, R. B., Ahn, J. W., Gunn-Sandell, L. B., & Scallan Walter, E. J. (2025). Economic Burden of Foodborne Illnesses Acquired in the United States. Foodborne pathogens and disease, 22(1), 4–14. <https://doi.org/10.1089/fpd.2023.0157>
91. Centers for Disease Control and Prevention. (2024, March 20). Inspection practices and outbreak rates. Retrieved August 5, 2025, from <https://www.cdc.gov/restaurant-food-safety/php/practices/outbreak-rates.html>
92. CeaseFirePA (2025, March). Invest more to save more: Report on Pennsylvania's gun homicide trends and community violence intervention investments [Report]. CeaseFirePA Education Fund. <https://www.ceasefirepa.org/wp-content/uploads/2025/03/CeaseFirePA-Invest-More-to-Save-More-Report-2025.pdf>
93. CeaseFirePA (2025, March). Invest more to save more: Report on Pennsylvania's gun homicide trends and community violence intervention investments [Report]. CeaseFirePA Education Fund. <https://www.ceasefirepa.org/wp-content/uploads/2025/03/CeaseFirePA-Invest-More-to-Save-More-Report-2025.pdf>
94. Inspection found at Brady (2025). GunStoreTransparency.org, <https://gunstoretransparency.org/sites/default/files/reports/NYC155542400000004.015.pdf>
95. Office of the Inspector General. (2023). Audit of the Bureau of Alcohol, Tobacco, Firearms and Explosives' risk-based inspection selection processes and administrative actions issued to federal firearms licensees. Retrieved June 11, 2024, from https://oig.justice.gov/sites/default/files/reports/23-062_0.pdf.
96. Brady United. (n.d.). Report for Island Firearms. Gun Store Transparency Project. <https://gunstoretransparency.org/sites/default/files/reports/NYC155542400000004.015.pdf>.
97. See Office of the Attorney General of Pennsylvania. (2021). Pennsylvania gun tracing analytics platform [Data set]. Retrieved August 1, 2021, from <https://www.attorneygeneral.gov/gunviolence/pennsylvania-gun-tracing-analytics-platform/>; and Brady United. The Suppliers Of America's Gun Violence Epidemic: Review 2024 Data [dataset]. (2025). <https://www.bradyunited.org/resources/research/suppliers-americas-gun-violence-epidemic>
98. Office of the Attorney General of Pennsylvania. (2021). Pennsylvania gun tracing analytics platform [Data set]. Retrieved

August 1, 2021, from <https://www.attorneygeneral.gov/gunviolence/pennsylvania-gun-tracing-analytics-platform/>

99. Bradbury, S. (2019, May 23) Agents: McKees Rocks woman bought guns for drug dealer in exchange for heroin. Pittsburgh Post-Gazette. Retrieved August 5, 2025, from <https://web.archive.org/web/20201107231620/https://www.post-gazette.com/news/crime-courts/2019/05/23/McKees-Rocks-Jessica-Zurawski-buys-guns-drug-dealer-exchange-heroin-straw-purchase/stories/201905230132>

100. Superseding Indictment, United States v. Ware, No. 2:22-cr-00018 (W.D. Pa. Mar. 1, 2022).

101. Google . (n.d.). Neville Island Firearms LLC reviews. Google Reviews. Retrieved June 12, 2025, from https://www.google.com/search?sca_esv=3d1e29cf7e253e0e&rlz=1C5GCEM_enUS1113US1115&si=AMgyJEuzsz2NflaaWzrzdpxXXRaJ2hfdMsbe_mSWso6src8s1hxJgzFak_O27wnYokZ1p_dzSNDJWJ17-o_7cM-lakQNN9shoentFmjKl1jpBQ_dvrljnnK4YtaM26ohNDnhnG3_csa_9V42KoTIY9Nw7sAWUhrCg_; FamilyTreeNow. (n.d.). Address record: 7400 Grand Ave, Pittsburgh, PA 15225. FamilyTreeNow. Retrieved June 13, 2025, from https://www.familytreenow.com/records/people/address/7400-grand-ave_pittsburgh-pa-15225; Facebook. (n.d.). Profile transparency – Island Firearms LLC. Facebook. Retrieved June 13, 2025, from https://www.facebook.com/islandfirearms/about_profile_transparency; Facebook. (n.d.). Jennifer Pugh. Facebook. Retrieved June 13, 2025, <https://www.facebook.com/jennifer.m.pugh.5>; Pugh, J. (2015, December 19). [Comment on the obituary Michael Keefe]. Brusco-Falvo Funeral Home. Retrieved June 12, 2025, from <https://www.bruscofalvo.com/obituary/Michael-Keefe>.

102. ATF Active FFL listings from March 2024, April 2024, and October 2024. See: Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025). Federal Firearms Listings. ATF.gov. <https://www.atf.gov/firearms/listing-federal-firearms-licensees>.

103. Giffords Law Center. (n.d.). Gun dealers. Retrieved August 5, 2025, from <https://giffords.org/lawcenter/gun-laws/policy-areas/gun-sales/gun-dealers/>

104. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2024). Number of firearms sourced and recovered in the United States and territories (xcl) [Data set]. ATF. <https://www.atf.gov/resource-center/firearms-trace-data-2023>; Annual Estimates of the Resident Population for the United States, Regions, States, District of Columbia, and Puerto Rico: July 1, 2023 (NST-EST2024-POP) Source: U.S. Census Bureau, Population Division. Release Date: December 2024

105. N.J. Stat. § 2C:58-2.

106. 18 Pa.C.S. § 6112.

107. N.J. Stat. § 2C:58-2; N.J.A.C. 13:54-3.3.

108. N.J. Stat. § 2C:58-2.

109. N.J. Stat. § 2C:58-2.

110. 18 Pa.C.S. § 6111(b).

111. N.J.A.C. 13:54-6.2 - 6.4.

112. N.J. Stat. § 2C:58-2.; N.J. Admin. Code § 13:54-3.9.

113. 37 Pa. Code § 33.116(c).

114. National Shooting Sports Foundation (2016, February 24). Employee background checks — Yes, you should. Retrieved June 20 2025, from <https://web.archive.org/web/20250620000407/https://www.nssf.org/articles/employee-background-checks-yes-you-should/>. The page was deleted from the NSSF site sometime between June 20 - August 5 2025.

115. These states include California (Cal. Penal Code § 26915), Colorado (Colo. Rev. Stat. § 18-12-407), Connecticut (Conn. Gen. Stat. § 29-37f), Delaware (Del. Code Ann. tit. 24, § 904(b)), Illinois (430 Ill. Comp. Stat. Ann. 68/5-40), Maryland (Md. Code Ann., Pub. Safety § 5-110(a)(4)), Massachusetts (Mass. Gen. Laws ch. 6, § 172M), New Jersey (N.J. Stat. § 2C:58-2; N.J.A.C. 13:54-3.3), Virginia (Va. Code Ann. § 18.2-308.2:3) and Washington (Wash. Rev. Code Ann. § 9A.1.110(5)(b)).

116. 18 Pa.C.S. § 6111(b).

117. Pennsylvania Commission on Crime and Delinquency, Office of Gun Violence Prevention. (2025). Pennsylvania Office of Gun Violence Prevention: Initial Report & Strategic Plan (p. 27) [PDF]. Commonwealth of Pennsylvania. Retrieved from https://www.pa.gov/content/dam/copapwp-pagov/en/pccd/documents/criminaljustice/gunviolence/2025/pccd_ogvp_2025_initialreport_strategicplan.pdf.

118. Giffords Law Center to Prevent Gun Violence (2023, December 31). Maintaining records of gun sales. Retrieved May 2025 from <https://giffords.org/lawcenter/gun-laws/policy-areas/gun-sales/maintaining-records/>.

119. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2024, December 20). Don't Lie for the Other Guy. U.S. Department of Justice. Retrieved August 6, 2025, from <https://www.atf.gov/firearms/dont-lie-other-guy>

120. 47 Pa.C.S. § 4-471.1; Pennsylvania Liquor Control Board. (n.d.). RAMP training requirements. PA .gov. Retrieved July 31, 2025, from <https://www.pa.gov/agencies/lcb/alcohol-education-training/ramp/ramp-training>.

121. Brady. (n.d.). Gun Dealer Code of Conduct. Retrieved July 14, 2025, from <https://www.bradyunited.org/resources/issues/gun-dealer-code-of-conduct>.

122. Colorado House Democrats. (2025, June 25). Gun violence prevention law goes into effect. Retrieved August 5, 2025, from <https://www.cohousedems.com/news/gun-violence-prevention-law-goes-into-effect>.

123. Though the Senators' solution to gun store thefts is trying juveniles as adults when they commit thefts of guns, the authors of this report disagree that this is an effective deterrent. <https://>

www.timesobserver.com/news/local-news/2025/05/senators-propose-more-punishment-for-gun-store-thefts/.

124. Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, February 28). Federal Firearms Licensee Theft/Loss Report – 2024. U.S. Department of Justice. Retrieved July 13, 2025, from <https://www.atf.gov/resource-center/federal-firearms-licensee-theftloss-report-2024>; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, May 28). Federal Firearms Licensee Theft/Loss Report – 2023. U.S. Department of Justice. Retrieved July 13, 2025, from <https://www.atf.gov/resource-center/data-statistics/federal-firearms-licensee-theft-loss-report-2023>; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, February 28). Federal Firearms Licensee Theft/Loss Report – 2022. U.S. Department of Justice. Retrieved July 13, 2025, from <https://www.atf.gov/resource-center/federal-firearms-licensee-theftloss-report-2022>; Bureau of Alcohol, Tobacco, Firearms and Explosives. (2025, May 29). Federal Firearms Licensee Theft/Loss Report – 2021. U.S. Department of Justice. Retrieved July 13, 2025, from <https://www.atf.gov/resource-center/federal-firearms-licensee-theft/loss-report-2021>; Bureau of Alcohol, Tobacco, Firearms and Explosives. (n.d.). Federal Firearms Licensee (FFL) Theft/Loss Report - Calendar Year 2020 [PDF]. U.S. Department of Justice. Retrieved July 13, 2025, from <https://www.atf.gov/file/152616/download>

125. NCPA Staff (2025, June). Williamsport gun shop burglarized, suspects remain unknown. NorthCentralPA.com. https://www.northcentralpa.com/news/williamsport-gun-shop-burglarized-suspects-remain-unknown/article_78cd0f28-13f8-4dd8-a535-48cb4a87d575.html.

126. Borrasso, J. (2025, March 26). Security video shows suspects shooting their way into a gun store. CBS Pittsburgh. Retrieved June 12, 2025, from <https://www.cbsnews.com/pittsburgh/news/allegheeny-arms-break-in-security-video/>

127. NCPA Staff (2025, June). Williamsport gun shop burglarized, suspects remain unknown. NorthCentralPA.com. <https://www.northcentralpa.com/news/williamsport-gun-shop-burglarized-suspects-remain-unknown/article>

128. Whittaker, J. (2024, December 20). Two Jamestown men facing charges. Times Observer. <https://www.timesobserver.com/news/cops-court-report/2024/12/two-jamestown-men-facing-charges/>

129. Morel, L. C. (2017, November 1). Prime targets: Weak security makes gun stores a 'rich environment' for thieves. Tampa Bay Times. Retrieved June 12, 2025, from <http://project.tampabay.com/2017/special-report/unlocked-loaded/gun-dealers/>

130. Morel, L. C. (2017, November 1). Prime targets: Weak security makes gun stores a 'rich environment' for thieves. Tampa Bay Times. Retrieved June 12, 2025, from <http://project.tampabay.com/2017/special-report/unlocked-loaded/gun-dealers/>

131. 18 Pa.C.S. § 6113.; 31 Pa. Code § 31.105: No information found online as of July 30, 2025 of the PSP Commissioner ever declaring “a clear and present danger to public safety,” and such would be required to done “through public announcements through the news media”

132. C.R.S. 18-12-406.

133. N.J.A.C. 13:54-6.2 - 6.4.

134. N.Y. Gen. Bus. Law § 875-b.

135. Minn. Stat. § 624.7161.

136. Minn. Admin. Rules § 7504.0300.

137. Metal grates and grating must have spaces no larger than six inches wide along any diagonal. Metal screen must have spaces no larger than three inches wide along any diagonal. Steel bars must be no more than six inches apart on center. See: Minn. Admin. Rules § 7504.0300.

138. Information, United States v. Williams, No. 2:23-cr-10 (W.D. Pa. Jan. 11, 2023). See also: U.S. Attorney's Office, Western District of Pennsylvania. (2023, February 28). Federal firearms licensee pleads guilty to 5 counts of violating gun laws [Press release]. U.S. Department of Justice. Retrieved August 5, 2025, from <https://www.justice.gov/usao-wdpa/pr/federal-firearms-licensee-pleads-guilty-5-counts-violating-gun-laws>; U.S. Attorney's Office, Western District of Pennsylvania. (2023, June 9). Federal firearms licensee sentenced on violation of gun laws [Press release]. U.S. Department of Justice. Retrieved August 5, 2025, from <https://www.justice.gov/usao-wdpa/pr/federal-firearms-licensee-sentenced-violation-gun-laws>; Pittsburgh Post-Gazette (2023, March 1) Butler firearms dealer admits not recording transactions. Retrieved August 5, 2025, from <https://web.archive.org/web/20230331121551/https://www.post-gazette.com/news/crime-courts/2023/03/01/butler-firearms-dealer-recording-transactions-sportsman-supply/stories/202303010085>

139. Commonwealth of Pennsylvania, Department of Agriculture. (n.d.). Retail food inspection reports. Retrieved August 1, 2025, from <https://www.pa.gov/agencies/pda/food/food-safety/retail-food-inspection-reports>