

Testimony against SB215
House Government Oversight Committee
Submitted by Douglas Rogers on February 27, 2022

Chair Wilkin, Vice Chair White and ranking member Brown, thank you for this opportunity to submit testimony against SB215 in response to statements made at the last hearing.

Permitless carry increases violent crime

Representative White expressed interest in violent crime statistics in states after permitless carry was adopted. Since SB215 proponents want to dramatically change Ohio law on gun safety, proponents should show that violent crime rates would decrease in Ohio if SB215 were adopted. Proponents cannot, because violent crime has increased with permitless carry.

The conclusions of the best study on violent gun crimes after permitless carry adoption, the study by Everytown for Gun Safety (set forth in the Insert to these remarks at pp. 4-6) are:

“States such as Alaska and Arizona ... have experienced an increase in the rate of aggravated assaults with a gun since the enactment of permitless carry legislation.... This has resulted in hundreds more gun-related aggravated assaults in these states in 2017-2018 (the latest years for which data is available) compared to years prior to enactment.”¹

That study is not simply the conclusion of Everytown, but is supported by the research of the many independent experts cited in the study.²

Second, consider the FBI statistics on violent crime rates in Arizona from the date permitless carry was adopted in 2010 through 2020.³ They show that the rate of violent crime in Arizona increased by almost 17%, but the rate in the United States decreased by approximately 1 percent.⁴

Third, 23 state attorney generals, including Ohio Attorney General Yost, filed in the U.S. Supreme Court their joint conclusion (similar to the result in Arizona) that state gun purchase laws that require a background check and training decreases crime rates, directly contradicting the view of proponents of permitless carry:

“**objective permit regimes that allow a permit to any individual who meets a certain set of objective criteria**, which can include fingerprinting, a **background check**, a mental health records check, and **training in firearms handling** and/or laws regarding the use of force; such regimes are also known as “shall-issue,” as the laws typically mandate the relevant authority’s issuance of a permit to those who meet the established criteria. **These regimes have set the national standard in improving public safety while also respecting individuals’ rights.**” (pp. 4-5).

“The **empirical data on licensed carry** is extensive, and the weight of the evidence confirms that objective, non-discriminatory licensed-carry laws have two results: (1) statistically significant reductions in some types of violent crime, or (2) no statistically significant effect

on violent crime. This has held true despite the overwhelming increase in the number of concealed handgun permits issued in the past decade.” (p. 8)

“These results have established objective-issue permit regimes as the national standard for public safety with respect to citizen-carry. This standard is tailored to the states’ interests in public safety through objective permit application criteria, provides **enhanced citizen safety**, and at the same time protects individuals’ right to carry a weapon for self-defense in public.” (pp. 17-18)(emphasis added) ⁵

Since empirical data these Republican attorneys general relied on, including Attorney General Yost, showed that laws requiring background checks and training in the use of guns “enhanced public safety,” it would be dangerous to scrap the training and background check requirements for current Ohio concealed carry law.

Endangering, and making the job, of law enforcement more difficult

There is no serious dispute, moreover, that SB215 would make the jobs of law enforcement officers more difficult and dangerous. No one has challenged the following statements of respected Ohio law enforcement officers and retired law enforcement officers:

Retired officer Weinman testified last week that SB215 essentially handcuffs police and makes their lives significantly more difficult.⁶

Hamilton County Sheriff Charmaine McGuffey said SB215 represents “lawlessness...the wild wild west.... It puts our officers at risk.”⁷

The Ohio Prosecuting Attorneys Association said permitless carry “places the safety of law enforcement at greater risk”.⁸

The Ohio Association of Chiefs of Police, the Ohio Mayors Alliance and the Ohio FOP testified that SB215 “threatens the safety of our communities and our law enforcement professionals.”⁹

Yet sponsors persist in endangering law enforcement by pushing this legislation. Why put the lives of police officers at greater risk of death and other harm, unless you are anti-police?

Drop in concealed carry license applications after permitless carry

Mr. Ratner, a proponent for SB215, falsely claimed at the last hearing on SB215 there is “absolutely zero evidence that permitless applications will decline” after permitless carry is adopted in a state.¹⁰ In fact, in June of 2020, “nearly 39,000 Texans applied for a gun permit for the first time” to carry a gun openly or concealed.¹¹ Texas made it legal on September 1, 2021 “for most people 21 or over to carry a handgun in a holster without a permit both openly and/or concealed.”¹² By November, 2021, monthly applications for gun permits precipitously fell to under 5,000.¹³

Look also at the yearly drop in concealed carry license applications after Kentucky adopted permitless carry as of June 28, 2019, taken from the Kentucky State Police statistics:¹⁴

Kentucky	2017	2018	2019	2020
Concealed carry license applications received	34,134	35,031	14,5001	15,824

The dramatic drop in concealed carry license applications received in Kentucky is more dramatic when considering the fact that more than 5 million adults in this country became first-time gun owners between January, 2020 and April 2021,¹⁵ so one could expect the number of applications to increase during that time period. Instead, the license applications in our neighboring state Kentucky dropped after permitless carry became effective.

Dropping the requirement for concealed carry licenses also sends a dangerous message to Ohioans about the standard for carrying concealed firearms. Imagine someone in college just turning 21 and deciding that since SB215 says no training is necessary, that college student will not get training and then purchase a gun and go to a party carrying concealed without any training.

SB215 would result in more individuals carrying concealed firearms without training in firearms. Those of us who do not carry firearms will not be able to avoid individuals who are carrying by avoiding them, because they carry concealed. The police will not be able to determine who is carrying illegally and enforce the law.

Conclusion

As Sheriff McGuffey said, SB215 passage would lead to lawlessness. The public should keep in mind at the next election, when voting on candidates who supported SB215, that SB215 is anti-police and anti-public safety.

Douglas Rogers
Bexley, Ohio

INSERT -- INCREASE IN GUN VIOLENCE DUE TO PERMITLES CARRY

“Laws that weaken a state’s firearm permitting system have been a precursor to permitless carry legislation, and a substantial body of research shows that these laws have led to a rise in gun violence and violent crime more broadly. States that have weakened their firearm permitting system have experienced an 11 percent increase in handgun homicide rates¹² and a 13-15 percent increase in violent crime rates.¹³ Conversely, states that provided law enforcement discretion to

issue carry permits saw 11 percent lower homicide rates compared to states that did not have that discretion.¹⁴

12. Michael Siegel et al., “Easiness of Legal Access to Concealed Firearm Permits and Homicide Rates in the United States,” *American Journal of Public Health* 107, no. 12 (December 1, 2017): 1923–29, <https://ajph.aphapublications.org/doi/>

13. John J. Donohue, Abhay Aneja, and Kyle D. Weber, “Right-To-Carry Laws and Violent Crime: A Comprehensive Assessment Using Panel Data and a State-Level Synthetic Control Analysis,” NBER Working Papers (National Bureau of Economic Research, November 2018), <https://www.nber.org/papers/w23510.pdf>

14. Michael Siegel and Claire Boine, “What Are the Most Effective Policies in Reducing Gun Homicides?” (Rockefeller Institute of Government, March 29, 2019), <https://rockinst.org/wp-content/uploads/2019/08/8-13-19-Firearm-Laws-Homicide-Brief.pdf>.

Since many states have only recently passed permitless carry legislation, research is limited on the impact of these newer laws.¹⁵ But early signs are not good: States that have enacted permitless carry legislation are seeing increased violent gun crimes. States such as Alaska and Arizona (see table), have experienced an increase in the rate of aggravated assaults with a gun since the enactment of permitless carry legislation.¹⁶ This has resulted in hundreds more gun-related aggravated assaults in these states in 2017-2018 (the latest years for which data is available) compared to years prior to enactment.¹⁷

15. The following states currently require a person to obtain a permit to carry a concealed handgun in public: AL, AR, CA, CO, CT, DE, FL, GA, HI, IA, IL, IN, LA, MA, MD, MI, MN, MT, NC, NE, NJ, NM, NV, NY, OH, OR, PA, RI, SC, TN, TX, UT, VA, WA and WI.

16. Eleanor Dotomain, “Crime Reported in Alaska 2001,” Uniform Crime Reporting Program (Alaska Department of Public Safety), <https://bit.ly/2SQDEUt>; Kristi Johnson, “Crime Reported in Alaska 2002,” Uniform Crime Reporting Program (Alaska Department of Public Safety), <https://bit.ly/2wtDyZZ>; Christen L. Spears, “Crime in Alaska 2017,” Uniform Crime Reporting Program (Alaska Department of Public Safety, August 2018), <https://bit.ly/37OZagy>; Christen L. Spears, “Crime in Alaska 2018,” Uniform Crime Reporting Program (Alaska Department of Public Safety, September 2019), <https://bit.ly/2srLtoX>; “Crime in Arizona 2008” (Arizona Department of Public Safety, Access Integrity Unit), <https://bit.ly/2V6IChk>; “Crime in Arizona 2009” (Arizona Department of Public Safety, Access Integrity Unit), <https://bit.ly/2SQNRjP>; “Crime in Arizona 2017” (Arizona Department of Public Safety, Access Integrity Unit), <https://bit.ly/2PdLfdR>; “Crime in Arizona 2018” (Arizona Department of Public Safety, Access Integrity Unit), <https://bit.ly/2ZsFlce>. Rates were calculated using population data from the United States Census Bureau. The percent increase in rates was

calculated using the average rate per 100,000 for two years prior to enactment (2001-2002 for Alaska and 2008-2009 for Arizona) and the average rate per 100,000 for the two latest years for which data is available (2017-2018). The average rate of aggravated assaults with a gun per 100,000 people in Alaska was 80.0 for the years 2001-2002 and 132.0 for 2017-2018. In Arizona, the average rate of aggravated assaults with a gun per 100,000 people was 68.9 in 2008-2009 and 74.1 in 2017-2018.

17. See note 16 for data sources. The increase in the number of aggravated assaults with a gun was calculated using the average number for two years prior to enactment (2001-2002 for Alaska and 2008-2009 for Arizona) and the two latest years for which data is available (2017-2018). The average number of aggravated assaults with a gun in Alaska was 511 for the years 2001-2002 and 975 for 2017-2018. In Arizona, the average number of aggravated assaults with a gun was 4,347 in 2008-2009 and 5,267 in 2017-2018.”

<https://everytownresearch.org/report/permitless-carry-carrying-a-concealed-gun-in-public-with-no-permit-and-no-training/>

¹ <https://everytownresearch.org/report/permitless-carry-carrying-a-concealed-gun-in-public-with-no-permit-and-no-training/> , @ text accompanying notes 16-17 (emphasis added).

² *Id.* at notes 12-17.

³ Provided online by FBI Crime Data Explorer @ <https://crime-data-explorer.fr.cloud.gov/pages/explorer/crime/crime-trend> .

⁴ See chart attached as Exhibit A, printed from the FBI Crime Data Explorer , with my handwritten notes adding the exhibit name, “ARIZONA,” “US” and “2010”). Ohio has a population of 11,727,377, and Arizona has a population of 7,640,796. See <https://worldpopulationreview.com/states/ohio-population> and <https://worldpopulationreview.com/states/arizona-population>. Ohio has three major cities: Columbus (921,605); Cleveland (374,394); and Cincinnati (308,929). See <https://worldpopulationreview.com/states/cities/ohio> . Arizona has three major cities: Phoenix (1,759,943); Tucson (557,718); and Mesa (548, 213). Arizona is the state with the largest population and three major metropolitan areas that adopted permitless carry more than a year ago. <https://worldpopulationreview.com/states>

⁵ Brief of Attorneys General of 23 states, including Attorney General Dave Yost, Ohio Attorney General (Jan. 18. 2019), in Thomas R. Rogers and Association of New Jersey Rifle & Pistol Clubs, Inc, Petitioners v. Gurbir Grewal, Patrick J. Callahan, Kenneth J. Brown, Jr., Joseph W. Oxley. And Peter Conforti, No. 18-824, https://www.supremecourt.gov/DocketPDF/18/18-824/81123/20190118153333691_AZ%20Amicus%20Brief%20-%20Rogers%20v.%20Grewal_FINAL%20-%202023%20States.pdf

The full text of the Brief will be provided to the Chair and Ranking Member at the time of the next hearing on SB215.

⁶ Ohio Channel Live, <https://ohiohouse.gov/legislation/134/sb215/committee> , @ c. 59:15 and later.

⁷ 2/24/22 WCPO article quoting Sheriff McGuffey @ <https://www.wcpo.com/news/state/state-ohio/it-represents-the-wild-wild-west-tri-state-leaders-discuss-bill-that-would-change-ohios-concealed-carry-requirements>

⁸ <https://www.legislature.ohio.gov/legislation/legislation-committee-documents?id=GA133-HB-178> , on HB178.

⁹ See attached Exhibit B.

¹⁰ Ohio Channel Live, 2/17/220, @ c. 2:34:08, <https://ohiochannel.org/video/ohio-house-government-oversight-committee-2-17-2022>

¹¹ Cayla Harris, Texas Gun Permit Applications peaked in 2020, plummeted in 2021, Jan. 21, 2022, @ https://flipboard.com/@houstonchron/trending-houston-headlines-h1uol3vnz/texas-gun-permit-applications-peaked-in-2020-plummeted-in-2021/a-jGdnv_tVT0OMIGsRhUxDhQ%3Aa%3A2858497449-44093768a3%2Fhoustonchronicle.com ; and <https://darik.news/texas/texas-gun-permit-applications-to-peak-in-2020-decrease-in-2021/202201485310.html>

¹² <https://www.austintexas.gov/department/open-carry>

¹³ See Cayla Harris, *supra* note 4.

¹⁴ See attached Exhibit C.

¹⁵ <https://www.theguardian.com/us-news/2021/dec/20/us-gun-purchases-2020-2021-study#:~:text=Gun%20purchases%20accelerated%20in%20the%20US%20during%202020%2D2021%20compared,on%20new%20gun%20ownership%20reveals.>

Trend of Violent Crime from 2010 to 2020

From	To	Crime Select
2010	2020	All Violent C...

Click legend to show/hide elements

DOWNLOAD

Rate of Violent Crime Offenses by Population





Dear Honorable Members of the 134th Ohio General Assembly:

On behalf of police chiefs throughout the state, thousands of members of the Ohio Fraternal Order of Police (FOP), and Ohio's largest bipartisan coalition of mayors, we stand together to express our strong opposition to the proposed law changes in Senate Bill 215 and House Bill 227.

We know there is a shared commitment to public safety in Ohio and all her cities, towns, and villages. That commitment was reflected in recent efforts by the Ohio General Assembly to suballocate a significant portion of federal resources to local communities to help with a wide range of law enforcement supports. However, the proposal to repeal Ohio's concealed carry permitting law betrays this shared commitment and threatens the safety of our communities and our law enforcement professionals.

Our organizations oppose these bills for three primary reasons: officer safety, crime prevention, and community violence. We will attempt to concisely summarize these concerns below as more detailed explanations have already been submitted to the House and Senate committees that have been holding hearings on these proposals.

First, these proposed law changes threaten officer safety because of the fundamental changes to the *duty to notify* provisions for those carrying a concealed firearm. Police officers face uncertainty and potentially life-threatening danger every day. The current *duty to promptly notify* for concealed carry license holders is one small step to help reduce that uncertainty and keep police officers safe. It also helps to establish an important distinction between lawful gun owners and those who are illegally concealing a weapon. Switching the burden to police – who already have a list of questions to ask – to inquire if the person is carrying would unnecessarily make the already difficult job of police officers more difficult and potentially lead to dangerous mistakes.

Second, this proposed law change would make it more difficult for police officers to prevent crime and take illegal guns out of the hands of criminals. This is because law enforcement would be prohibited from stopping a suspicious individual with a firearm. It would also prevent officers from temporarily seizing a firearm during an investigative detention, which would senselessly endanger our law enforcement professionals. Furthermore, the proposed law change would require officers to make an unknowable determination if a suspect is "law-abiding" before an investigation even occurs.

EXHIBIT B

Third, communities across the state and country are seeing an increase in gun violence. Illegal guns in the hands of criminals have contributed to a record number of homicides in some communities. We believe that allowing even more individuals to carry concealed weapons with no training or background check, and few ways to address those who may be illegally carrying, will result in more gun violence in our communities.

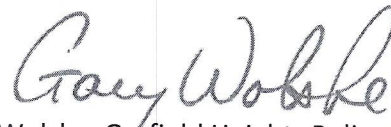
There is no doubt that Ohio's current concealed carry law has prevented individuals from carrying concealed weapons that shouldn't have them. In 2020, over 2,000 concealed carry licenses were revoked, and 1,777 licenses were denied by sheriffs' offices throughout Ohio. If Ohio's concealed carry licensing laws are repealed, there will be very few safeguards to prevent potentially dangerous individuals, including by those previously convicted of misdemeanor assaults on police officers, from carrying a concealed firearm.

In closing, we know there are areas of common ground when it comes to public safety. We look forward to continuing the difficult work we must do together to keep Ohio and all her communities safe. However, repealing Ohio's concealed carry permitting laws would be a dangerous step in the wrong direction that will make our communities less safe. We sincerely hope these bills do not advance past the committee process, but if they do, we are urging every member of the Ohio General Assembly to stand with our local leaders and law enforcement professionals in opposition to SB 215 and HB 227.

Respectfully submitted,



Bruce Pijanowski, Chief of Police, Delaware
**Ohio Association of Chiefs of Police
Legislative Committee, Chairman**



Gary Wolske, Garfield Heights Police Department
President, Ohio Fraternal Order of Police

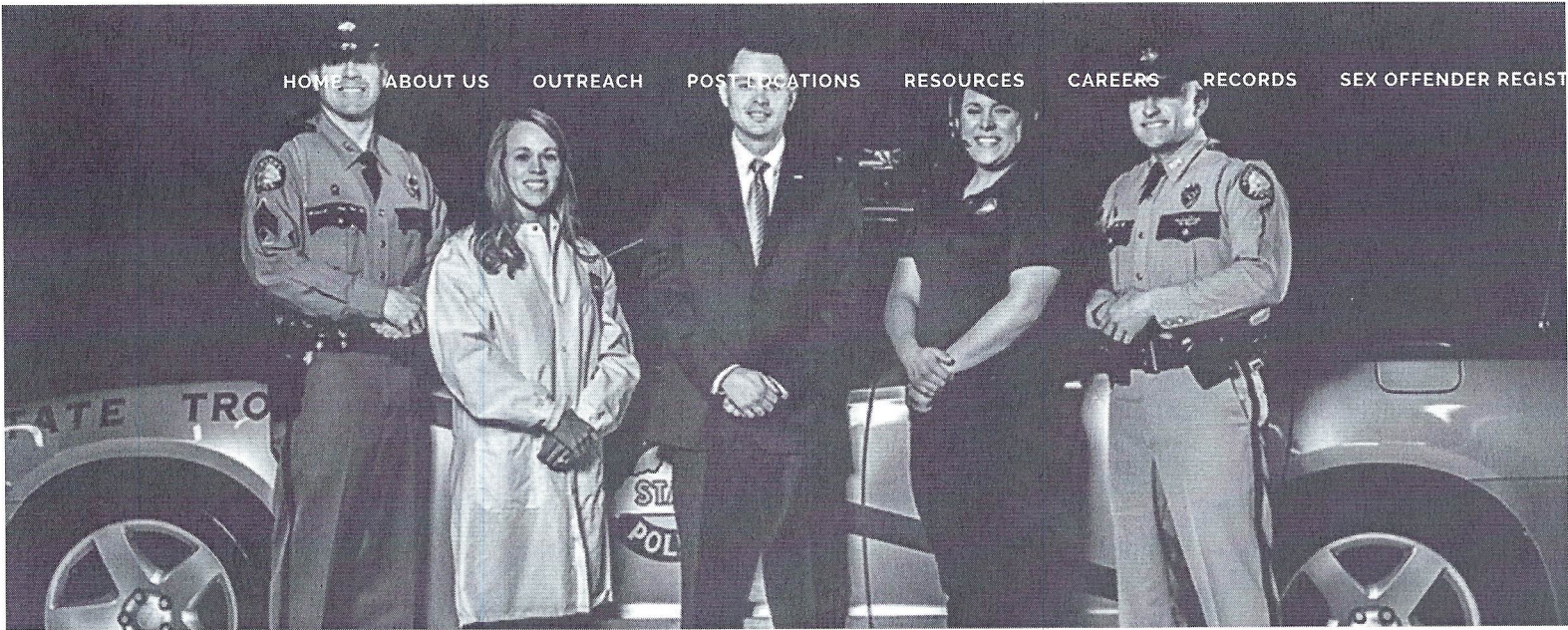


Mayor Tito Brown, City of Youngstown
**Ohio Mayors Alliance Executive Board and the
Mayors and Police Chiefs Leadership Committee**



Mayor Robert Stone, City of Beavercreek
**Ohio Mayors Alliance Executive Board and the
Mayors and Police Chiefs Leadership Committee**

EXHIBIT B



CONCEALED DEADLY WEAPONS

The Kentucky State Police was authorized by **KRS 237.110** to issue and renew licenses to carry concealed firearms or other deadly weapons, or a combination thereof, to qualified persons.

NEW CCDW CHANGES AND INFORMATION:

AS OF JUNE 28, 2019, PURSUANT TO 2019 SENATE BILL 150, ANY PERSON AGE TWENTY-ONE (21) OR OLDER, AND OTHERWISE ABLE TO LAWFULLY POSSESS A FIREARM, MAY CARRY CONCEALED FIREARMS OR OTHER CONCEALED DEADLY WEAPONS WITHOUT A LICENSE IN THE SAME LOCATIONS AS PERSONS WITH VALID KENTUCKY CCDW LICENSE ISSUED UNDER KRS 237.110.

If you have questions about the new CCDW laws you can find the FAQ's page at the button below.

EXHIBIT C

**Carrying Concealed Deadly Weapon (CCDW)
Annual Statistical Report**

As required under Kentucky Revised Statute 237.110 you will see below a statistical report indicating the number of licenses issued, revoked, suspended, and denied since the previous report. The reporting period for this status report is January 1, 2017 through December 31, 2017.

2017 STATISTICS

EVENT	2017	SINCE INCEPTION (1996)
Applications Received	34,134	488,398
CCDW Licenses Issued	33,872	471,644
LEOSA Licenses Issued	1,568	10,714*
Renewals Issued	40,758	356,468
Lost or Stolen Received	1,890	14,056
Revoked	503	6,682
Suspended	1,243	7,089
Denied	775	10,455

The statistics that are shown in the denial category include applications that are denied due to background checks, age, missing training certificate, other missing data, residency, or other reasons. The suspended category includes applications suspended due to Domestic Violence Orders issued and duplicate Social Security Numbers. The revoked category includes statistics pertaining to background checks, Lost/Stolen permits, non-residency, or other conditions.

In addition to the status information, the report shall also include the number of arrests, convictions, and types of crimes committed since the previous report of individuals licensed to carry concealed weapons. The information was compiled with the help of the Administrative Office of the Courts.

The listing of offenses indicates the offense and conviction status of each charge levied against an individual that is currently licensed to carry a concealed deadly weapon from January 1, 2017 through December 31, 2017. Multiple charges could be placed against a single individual. The charge column can be blank while the conviction and pending column indicates activity. For example, this will occur when the original charge of Burglary is amended to a Criminal Trespass charge that result in conviction.

*Began issuing LEOSA Licenses in February of 2006.

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2018 STATISTICS

EVENT	2018	SINCE INCEPTION (1996)
Applications Received	35,031	523,429
CCDW Licenses Issued	34,408	506,052
LEOSA Licenses Issued	1,729	12,443*
Renewals Issued	64,235	420,703
Lost or Stolen Received	1,956	16,012
Revoked	537	7,219
Suspended	1,228	8,317
Denied	767	11,222

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2019 STATISTICS

EVENT	2019	SINCE INCEPTION (1996)
Applications Received	14,500	537,929
CCDW Licenses Issued	14,548	520,600
LEOSA Licenses Issued	1,910	14,353*
Renewals Issued	41,464	462,167
Lost or Stolen Received	1,534	17,546
Revoked	593	7,812
Suspended	1,069	9,386
Denied	378	11,600

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2020 STATISTICS

EVENT	2020	SINCE INCEPTION (1996)
Applications Received	15,824	553,753
CCDW Licenses Issued	15,131	535,731
LEOSA Licenses Issued	1,876	16,229*
Renewals Issued	51,285	513,452
Lost or Stolen Received	1,460	19,006
Revoked	544	8,356
Suspended	845	10,231
Denied	441	12,041

The statistics that are shown in the denial category include applications that are denied due to background checks, age, missing training certificate, other missing data, residency, or other reasons. The suspended category includes applications suspended due to Domestic Violence Orders issued and duplicate Social Security Numbers. The revoked category includes statistics pertaining to background checks, Lost/Stolen permits, non-residency, or other conditions.

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