

Exhibit 11

To Defendants' Memorandum in Support of Motion for
Summary Judgment

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

STEPHEN V. KOLBE, *et al.*;

)

)

)

Plaintiffs,

)

Case No.: 1:13-cv-02841-CCB

)

v.

)

)

MARTIN O'MALLEY, *et al.*;

)

)

)

Defendants.

)

DECLARATION OF KRISTIN JONES BRYCE

I, Kristin Jones Bryce, under penalty of perjury, declare and state:

1. I am over the age of 21, and I am competent to make this declaration and to swear to the matters contained herein.

2. I am Chief of Staff to the Speaker of the Maryland House of Delegates, the Honorable Michael E. Busch.

3. The attached is a true and correct copy of a document that was circulated amongst members of the General Assembly during consideration of Senate Bill 281, the Firearms Safety Act of 2013.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.



Kristin Jones Bryce

TO: Governor's Legislative Office

FROM: Governor's Office of Crime Control & Prevention

RE: Senate Bill 281 – Assault Long Guns

DATE: February 19, 2013

I. SB 281 Prohibits Assault Weapons

Senate Bill 281 would prohibit, with certain exceptions, "assault weapons." The definition of "assault weapon" in the bill includes "assault pistols," which are prohibited under current law, as well as "assault long guns" and "copycat weapons."

II. "Assault Long Guns" are Assault Weapons

SB 281 would prohibit "assault long guns" listed in *Public Safety Code*, §5-101(R)(2). The following list of specific assault weapons or their copies, regardless of which company produced and manufactured that assault weapon, would be prohibited:

(i) American Arms Spectre da Semiautomatic carbine;



Spectre Auto Carbine

<http://members.shaw.ca/tmcveigh/Projects/GunRights/prohiblist.html>

(ii) AK-47 in all forms;



AK-47 assault rifle

<http://www.enemyforces.net/firearms/ak47.htm>

(iii) Algimec AGM-1 type semi-auto;



Algimec AGM-1

<http://45-70govt.tumblr.com/post/19758726574/al-gi-mec-agm-1-carbine-9x19mm>

(iv) AR 100 type semi-auto;



Daewoo AR 100. Also see below, (xvi).

(v) AR 180 type semi-auto;



Costa Mesa Production Armalite AR-180 Semi-Automatic Rifle

<http://www.rockislandauction.com/viewitem/aid/52/lid/1702>

(vi) Argentine L.S.R. semi-auto;



L.S.R.

LIGHT SEMIAUTOMATIC RIFLE

7.82 x 51 MM
(.308 Win.)

Direccion General de Fabricaciones Militares
Fabrica Militar de Armas Portatiles - Domingo Matheu
Rosario, Argentina

Argentine LSR

<http://www.alpharubicon.com/leo/faloperatorsmanual.htm>

(vii) Australian Automatic Arms SAR type semi-auto;



Australian Automatic Arms Semi-Automatic Rifle

<http://www.securityarms.com/firearm/3494>

(viii) Auto-Ordnance Thompson M1 and 1927 semi-automatics;



Auto-Ordnance Thompson M1 Carbine 45 ACP

<http://www.westernmassfirearms.com/catalog/item.aspx?id=338>



Auto-Ordnance Corporation Thompson 1927 A1 Standard Semi-Automatic Rifle

<http://www.rockislandauction.com/viewitem/aid/56/lid/574>

(ix) Barrett light .50 cal. semi-auto;



Barrett 0.50 caliber model 82A1 "Light Fifty"

http://members.tripod.com/~combat_arms/weapons.html

(x) Beretta AR70 type semi-auto;



Beretta AR70 assault rifle

<http://members.shaw.ca/tmcveigh/Projects/GunRights/prohiblist.html>

(xi) Bushmaster semi-auto rifle;



Bushmaster .223 caliber Remington semiautomatic rifle

<http://newsfeed.time.com/2012/12/19/bushmaster-223-weapon-used-in-newtown-shooting-a-lightning-rod-in-gun-debate/>

(xii) Calico models M-100 and M-900;



Calico M-100 Rifle

<http://thespecialistsltd.com/calico-m100>



Calico M-900 Rifle

http://www.imfdb.org/wiki/Calico_Series_of_Rifles_and_Pistols

(xiii) CIS SR 88 type semi-auto;



Chartered Industries of Singapore SR-88 assault rifle

<http://world.guns.ru/assault/sing/cis-sr--e.html>

(xiv) Claridge HI TEC C-9 carbines;



Claridge Hi-Tec C-9 Carbine

<http://www.securityarms.com/firearm/3144>

(xv) Colt AR-15, CAR-15, and all imitations except Colt AR-15 10 Sporter H-BAR rifle;



Colt AR-15 rifle

<http://guns.findthebest.com/q/11/1218/What-are-the-dimensions-of-the-Colt-AR-15-Rifle>



Colt CAR-15

<http://world.guns.ru/assault/usa/colt-car-15-xm-177-e.html>

(xvi) Daewoo MAX 1 and MAX 2, aka AR 100, 110C, K-1, and 12 K-2;



Daewoo Max 1 assault rifle

<http://www.falfiles.com/forums/printthread.php?t=317238&pp=40>



Daewoo Max 2 assault rifle

<http://www.ammosmith.com/forum/index.php?topic=3498.0>



Daewoo AR-110C

<http://www.ar15.com/archive/topic.html?b=7&f=93&t=1062705>



Daewoo K1A1

<http://world.guns.ru/assault/skor/daewoo-k1-and-k2-e.html>



Daewoo K2

<http://world.guns.ru/assault/skor/daewoo-k1-and-k2-e.html>

(xvii) Dragunov Chinese made semi-auto;



Dragunov sniper rifle

<http://deadlyweapons-army.blogspot.com/2011/07/deadly-dragunov-sniper-rifle.html>

(xviii) Famas semi-auto (.223 caliber);



FAMAS semi-automatic rifle

http://www.icollector.com/Rare-Pre-Ban-French-Semi-Automatic-FAMAS-Bullpup-Rifle-with-a-Full-Complement-of-Accessories_i14553497

(xix) Feather AT-9 semi-auto;



Feather Industries, Inc. AT-9 semi-automatic

<http://picturearchive.gunauction.com/7354200214/9812096/318e3c44d4e73f1465bf73487993d693.jpg>

(xx) FN LAR and FN FAL assault rifle;



FN FAL assault rifle

<http://world.guns.ru/assault/be/fn-fal-e.html>

(xxi) FNC semi-auto type carbine;



FNC Semi-auto carbine

<http://www.remtek.com/arms/fn/fnc/index.htm>

(xxii) F.I.E./Franchi LAW 12 and SPAS 12 assault shotgun;



Franchi Law 12 semi-automatic shotgun

http://www.icollector.com/Luigi-Franchi-Law-12-12-ga-SN-S77268-Semi-auto-tactical-shotgun-with-pistol-grip-stock-shoulder-sto_i9896381



Franchi SPAS 12 Assault Shotgun

http://en.wikipedia.org/wiki/File:Franchi_SPAS-12_Shotgun.JPG

(xxiii) Steyr-AUG-SA semi-auto;



Steyr AUG A3 SA

<http://www.tactical-life.com/online/products/steyrs-aug/>

(xxiv) Galil models AR and ARM semi-auto;



Galil AR 7.62 mm

<http://world.guns.ru/assault/isr/galil-e.html>



Galil ARM 5.56 mm, with bipods unfolded

<http://world.guns.ru/assault/isr/galil-e.html>

(xxv) Heckler and Koch HK-91 A3, HK-93 A2, HK-94 A2 and A3;



HK 91 A3

<http://www.prebanarmory.com/hk-91-a3-2/>



HK 93 A2

<http://www.prebanarmory.com/hk-93-a2/>



HK 94 A2

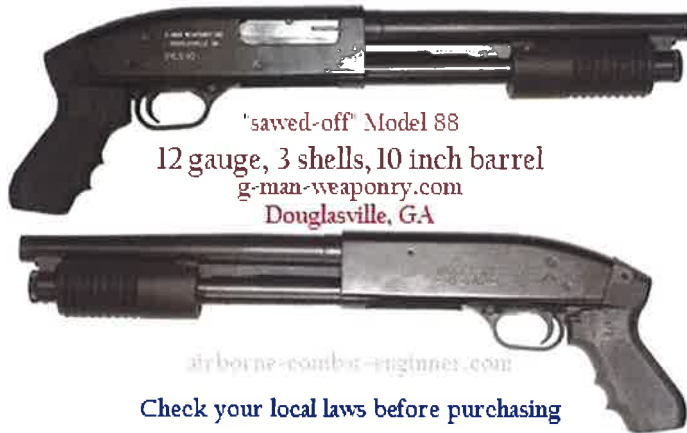
http://www.hkspecialiststore.com/product_detail.php?Category=29&Page Number=1&Index Seq=1121



HK 94 A3

<http://www.gunauction.com/search/displayitem.cfm?itemnum=9800886>

(xxvi) Holmes model 88 shotgun;



"Sawed off" Holmes Model 88 Shotgun

<http://img.photobucket.com/albums/v99/smallestminority/sawedoff.jpg>

(xxvii) Avtomat Kalashnikov semiautomatic rifle in any format;



Avtomat Kalishnikova Model AK-47 Assault Rifle

http://en.wikipedia.org/wiki/File:AK-47_type_II_Part_DM-ST-89-01131.jpg

(xxviii) Manchester Arms “Commando” MK-45, MK-9;



Manchester Arms “Commando” MK-45

http://www.hunt101.com/data/548/medium/Manchester_Arms_Mk45_LH.jpg



Manchester Arms “Commando” MK-9

<http://www.gunauction.com/search/displayitem.cfm?itemnum=6789023>

(xxix) Mandell TAC-1 semi-auto carbine;

Image not available

(xxx) Mossberg model 500 Bullpup assault shotgun;



Mossberg 500 bullpup shotgun, <http://world.guns.ru/shotgun/usa/mossberg-500-e.html>

(xxxii) Sterling Mark 6;



Sterling Armament Company Mark 6 9mm Submachine Gun

<http://www.gunstar.co.uk/Deactivated-Submachine-Gun/Sterling-Armament-Company-Mark-6-Serial-Number-1-gun-for-sale-gs85417.aspx>

(xxxiii) P.A.W.S. carbine;



Police Automatic Weapon Systems model ZX8 carbine

<http://www.gunauction.com/search/displayitem.cfm?itemnum=9007340>

(xxxiii) Ruger mini-14 folding stock model (.223 caliber);



Ruger Mini-14, SS, folding stock

<http://www.armslist.com/posts/824153/washington-rifles-for-sale--ruger-mini-14-folding-stock-ss-1-magazine>

(xxxiv) SIG 550/551 assault rifle (.223 caliber);



SIG 551 .223 caliber

http://www.kitsune.addr.com/Firearms/Auto-Rifles/SIG_SG_550.htm



SIG 550 – SAR Europe Sport .223

http://www.setac.de/lehrgaenge_leihwaffen_buechsen.html

(xxxv) SKS with detachable magazine;



SKS with detachable magazine

http://wintergardentacticalguns.com/index.php?main_page=product_info&products_id=90

(xxxvi) AP-74 Commando type semi-auto;



Adler-Jager AP74 rifle - .22 LR

http://www.imfdb.org/wiki/M16_rifle_series

(xxxvii) Springfield Armory BM-59, SAR-48, G3, SAR-3, 10 M-21 sniper rifle, M1A, excluding the M1 Garand;



BM-59 rifle

<http://www.ar15.com/archive/topic.html?b=6&f=6&t=322980>



Springfield Armory SAR-48 rifle

<http://members.shaw.ca/tmcveigh/Projects/GunRights/prohiblist.html>



Springfield Armory SAR-3

<http://www.arizonaresponsesystems.com/finish/pagefinishgallery.shtml>



20 round mag, Harris bipod and scope not included.

Springfield Armory SPG M21 Tactical M1A .308

https://www.iammo.com/Firearms-Training/Rifles/31761-SA9121_Springfield-Armory-SPG-M21-Tactical-M1A-308-Winchester-22-Barrel-10-1-Round-Capacity-Walnut-Stock-Blued-Finish-SA9121

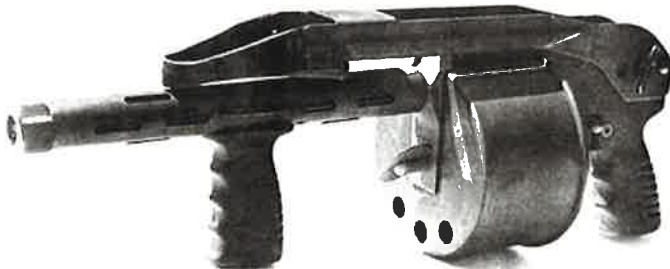
(xxxviii) Street sweeper assault type shotgun;



Street Sweeper

<http://www.atf.gov/firearms/guides/identification-of-nfa-firearms.html#street-sweeper>

(xxxix) Striker 12 assault shotgun in all formats;



Striker 12 Shotgun

<https://www.handgunclub.com/hca/2011/06/22/judging-the-aurus-judge-illegal-in-california/>

(xl) Unique F11 semi-auto type;



Unique F11 semi-automatic bullpup
<http://www.hunt101.com/showphoto.php?photo=610611>

(xli) Daewoo USAS 12 semi-auto shotgun;



Daewoo USAS-12 semi-automatic shotgun
http://www.chicompany.net/index.php?main_page=product_info&products_id=8

(xlii) UZI 9mm carbine or rifle;



UZI 9mm Carbine Model A
<http://www.msgunowners.com/t310-black-rifle-pics>

(xliii) Valmet M-76 and M-78 semi-auto;



Valmet M-76 .223
<http://parallaxscurioandreliefirearmsforums.yuku.com/topic/4454>



Valmet M-78 .308

<http://usedfirearms.ca/ads/3-valmets-the-holy-grail-new-in-box-m78-7-62x39-m78-308-and-hunter-in-308/>

(xlv) Weaver Arms “Nighthawk” semi-auto carbine; or



Weaver Arms Nighthawk Carbine

<http://members.shaw.ca/tmcveigh/Projects/GunRights/prohiblist.html>

(xlv) Wilkinson Arms 9mm semi-auto “Terry”.



Wilkinson Arms Terry Carbine 9 mm Luger Semi-Automatic

<http://www.gunauction.com/buy/8349990/rifles-for-sale/semi-auto-rifle/wilkinson-arms-terry-carbine-9mm-luger-semi-auto-never-fired-no-reserv>

III. "Copycat Weapons" are Assault Weapons¹

In SB 281, a "copycat weapon" is defined as follows:

(I) a semiautomatic centerfire rifle that can accept a detachable magazine and has any of the following^[2]:

1. A pistol grip that protrudes conspicuously beneath the action of the weapon^[3];
<http://www.coltsmfg.com/Catalog/ColtRifles.aspx>



-
2. A thumbhole stock^[4];
<http://www.eabco.com/102201.html>



¹ See SB 281, page 6, line 3.

^[2] "detachable magazine" means an ammunition feeding device that can be removed readily from a firearm without requiring disassembly of the firearm action or without the use of a tool, including a bullet or cartridge.

^[3] "pistol grip that protrudes conspicuously beneath the action of the weapon" means a grip that allows for a pistol-style grasp in which the web of the trigger hand between the thumb and index finger can be placed below the top of the exposed portion of the trigger while firing.

^[4] "thumbhole stock" means a stock with a hole that allows the thumb of the trigger hand to penetrate into or through the stock while firing.

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3. A folding or telescoping stock;
<http://www.mesatactical.com/index.php?id=55>



-
4. A grenade launcher or flare launcher;
<http://i217.photobucket.com/albums/cc176/marauderjohn/5mgl1.jpg>



-
5. A flash suppressor^[5]; or
<http://www.defensereview.com/krinkov-aow-mini-ak-by-precision-weapons-corporationpwc/>



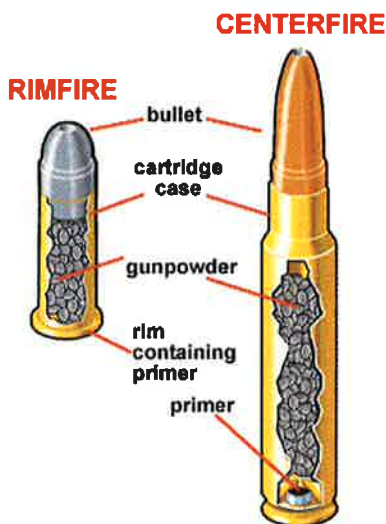
-
6. A forward pistol grip^[6];
<http://ultimak.com/gg1131.htm>

^[5] “flash suppressor” means a device that functions, or is intended to function, to perceptibly reduce or redirect muzzle flash from the shooter’s field of vision.

^[6] “forward pistol grip” means a grip that allows for a pistol-style grasp forward of the trigger



Centerfire v. Rimfire



(ii) a semiautomatic centerfire rifle that has a fixed magazine with the capacity to accept more than 10 rounds;

[http://www.gunsamerica.com/937616069/Chinese SKS with 20 RD box ma.htm](http://www.gunsamerica.com/937616069/Chinese_SKS_with_20_RD_box_ma.htm)



(iii) a semiautomatic centerfire rifle that has an overall length of less than 30 inches;
http://www.ar15.com/forums/t_1_5/1422473_SIG_MPX_Just_Announced.html



(iv) a semiautomatic pistol that can accept a detachable magazine and has any of the following:

1. A threaded barrel, capable of accepting a flash suppressor, forward handgrip, or silencer;

<http://www.cheaperthandirt.com/product/83594#>



-
2. A second handgrip;

Steyr TMP 9mmPara 001.jpg

http://en.wikipedia.org/wiki/File:Steyr_TMP_9mmPara_001.jpg



3. A shroud that is attached to or that partially or completely encircles the barrel, except for a slide that encloses the barrel, and that allows the bearer to fire the weapon without burning the bearer's hand; or

Dan Wesson Model 445 Alaskan Guide Special

<http://www.cz-usa.com/press-releases/72/>



-
4. The capacity to accept a detachable magazine outside the pistol grip;



-
- (v) a semiautomatic pistol with a fixed magazine that can accept more than 10 rounds;
-

(vi) a semiautomatic shotgun that has:

1. A folding or telescoping stock; and

2. A pistol grip that protrudes conspicuously beneath the action of the weapon, thumbhole stock, or vertical handgrip;

<http://www.saiga-12.com/>



(vii) a shotgun with a revolving cylinder.

<http://world.guns.ru/shotgun/safir/striker-protecta-e.html>



Assault Weapons Generally

<http://smartgunlaws.org/>

THE ANATOMY OF AN ASSAULT WEAPON

TELESCOPING STOCKS
provide concealability and mobility.


FOLDING STOCKS
provide concealability and mobility.

THUMBHOLE STOCKS
allow the shooter to control the weapon during rapid firing.

PISTOL GRIPS
allow the shooter to control the weapon during rapid firing.

BARREL SHROUDS
allow the shooter to hold the barrel without getting burned and thus control the firearm during rapid firing.

DETACHABLE MAGAZINES
continually feed ammunition into the chamber allowing the shooter to fire without the need to stop and reload. The magazine can be loaded or unloaded while detached from the firearm. Large capacity magazines can hold as many as 100 rounds of ammunition.

 **LAW CENTER TO PREVENT GUN VIOLENCE**