

POLICY BRIEFING

Safe Gun Storage and Voluntary Buyback Programs

Minnesota Firearms Preemption and Laws Overview

Preemption

Like most states, Minnesota has firearms preemption statutes, dating back to 1985, when the state legislature adopted [Statute § 471.633 Firearms](#):

The legislature preempts all authority of a home rule charter or statutory city including a city of the first class, county, town, municipal corporation, or other governmental subdivision, or any of their instrumentalities, to regulate firearms, ammunition, or their respective components to the complete exclusion of any order, ordinance or regulation by them except that:

- (a) a governmental subdivision may regulate the discharge of firearms; and*
- (b) a governmental subdivision may adopt regulations identical to state law.*

Local regulation inconsistent with this section is void.

“This explicitly preempted all cities, counties, towns and other governmental subdivision from regulating ‘firearms, ammunition or their respective components,’ with two exceptions. A governmental subdivision such as a city may regulate the discharge of firearms and it may adopt regulations identical to state law.”¹

Additional information on preemption from the League of Minnesota Cities includes:

C. Minnesota Citizens’ Personal Protection Act of 2003

With limited exceptions, for many years, cities have been unable to regulate the carrying or possession of pistols. In 2003, the Minnesota Citizens’ Personal Protection Act (MCPPA) imposed further limits on city regulation of pistols.

4. Counties as sole permit issuing authority

City police departments lost authority to issue permits to carry in 2003 though they still process permits to purchase or transfer firearms. Since then counties have been the sole authority to issue and process these permits to carry.

II. Valid firearm regulation by cities

Clearly, in most respects state law preempts city regulation of firearms. However, there are some valid regulatory options still available to cities.

A. Discharge

Cities may regulate the discharge of firearms within the city limits. Some cities prohibit discharge on public lands and roadways. In certain wildlife management areas, restrictions on discharge of shotguns may be invalid. Presumably, the Second Amendment would allow the discharge of firearms for self-defense purposes.

¹ League of Minnesota Cities. [Information memo: Firearm Regulations and Cities](#).

*B. Provisions identical to state law.
Cities may also adopt firearm regulations identical to state law.*

Safe Storage

Minnesota currently regulates the storage of firearms through [Minnesota Statute § 609.666 Negligent Storage of Firearms](#), which states “A person is guilty of a gross misdemeanor who negligently stores or leaves a loaded firearm in a location where the person knows, or reasonably should know, that a child is likely to gain access, unless reasonable action is taken to secure the firearm against access by the child.”

In May of this year, Minnesota House lawmakers passed a gun storage law change which would expand existing firearms storage laws to “to specify that a person must either store a firearm unloaded and equipped with a locking device or store the firearm in a firearm storage unit.” After more than an 11 hour discussion, the House passed [HF4300, as amended](#), 68-64 and sent it to the Senate. It is currently with the Senate.²

Additionally, current [Statute § 609.378, subd. 1\(c\)](#) states, “A person who intentionally or recklessly causes a child under 14 years of age to be placed in a situation likely to substantially harm the child’s physical health or cause the child’s death as a result of the child’s access to a loaded firearm is guilty of child endangerment and may be sentenced to imprisonment for not more than 364 days or to payment of a fine of not more than \$3,000, or both.

If the endangerment results in substantial harm to the child’s physical health, the person may be sentenced to imprisonment for not more than five years or to payment of a fine of not more than \$10,000, or both.”

With exceptions for disabled persons and hunting and shooting ranges, [Statute § 97B.045 Transporting Firearms](#) states, “A person may not transport a firearm in a motor vehicle unless the firearm is:

- (1) unloaded and in a gun case expressly made to contain a firearm, and the case fully encloses the firearm by being zipped, snapped, buckled, tied, or otherwise fastened, and without any portion of the firearm exposed;
- (2) unloaded and in the closed trunk of a motor vehicle; or
- (3) a handgun carried in compliance with sections [624.714](#) and [624.715](#).”

National Gun Preemption Landscape

45 states have adopted some degree of firearms preemption laws.^{3&4} States with no firearm-related preemption laws include: Connecticut, Hawaii, Massachusetts, New Jersey, and New York. States with some firearm-related preemption laws include California and Colorado. “In the remaining 43 states, local governments possess limited authority to regulate firearms and ammunition. The preemption statutes in these states vary, but each one expressly preempts all, or substantially all, aspects of local firearms and/or ammunition regulation. In many of these states, there are statutory exceptions that

² Walker, Tim. (May 2, 2024). [House passes bill expanding firearm storage requirement following fierce floor debate](#). *Minnesota House of Representatives*.

³ Simon, Rachel. [The Firearm Preemption Phenomenon](#). *Cardozo Law Review*.

⁴ Law Atlas. [State Preemption Laws](#).

may permit some local firearms and/or ammunition regulation. States with extreme preemption laws allow courts to impose fines, civil liability, or both, on legislators who are found to violate the state’s preemption statute.”⁵

Minneapolis Firearms Regulations

Minneapolis ordinances that regulate firearms can be found in [Chapter 393. – Weapons](#). This includes regulations relating to the discharging of weapons, including [393.150. - Firing or use of weapons](#) and [PB2-30. – Firearms and fireworks](#). The City’s regulations of discharging firearms are allowed under the state’s firearms preemption rules, along with other regulations in Chapter 393 which are identical to state law.

Safe Gun Storage Examples

Some cities regulate gun storage requirements, generally attempting to reduce children’s and other non-authorized individual’s access to firearms. Research shows safe storage provisions are associated with decreased adolescent firearm suicide⁶ as well as lower rates of homicides committed by children.⁷ For a broad overview of states with child-access and/or secure storage laws, non-profit Everytown for Gun Safety offers an [interactive map and chart](#).

1. Saint Paul, MN

In May 2023, the St. Paul City Council unanimously passed, and the Mayor signed, an ordinance that requires gun owners to lock up their firearms, making it a crime to store or leave a loaded or unloaded firearm in a place where an unauthorized person can access it. While the ordinance would not penalize people who take ‘reasonable action,’ to lock up their guns, firearms owners say the requirements would render their weapons inaccessible or inoperable in emergencies.⁸

In the MPR article, Rob Doar with the Minnesota Gun Owners Caucus said, “‘Under Minnesota’s preemption law, this ordinance is void. As far as we’re concerned, this ordinance doesn’t actually have any legal weight.’ Doar said the wording of the ordinance is vague, and he does not expect to challenge the measure in court unless the city attempts to enforce it.”⁹

In a MinnPost article, Saint Paul Ward 2 Council Member Rebecca Noecker discussed reasons behind the ordinance including gun theft from vehicles, children’s accidental access to firearms, and suicide prevention.¹⁰

In the same article, “Doar also noted that in the U.S. Supreme Court’s landmark 2008 gun ruling [District of Columbia v. Heller](#), the justices struck down on Second Amendment grounds a

⁵ Gifford Law Center to prevent Gun Violence. [Preemption of Local laws](#).

⁶ Kivisto, A. J., Kivisto, K. L., Gurnell, E., Phalen, P., & Ray, B. (2021). [Adolescent suicide, household firearm ownership, and the effects of child access prevention laws](#). *Journal of the American Academy of Child & Adolescent Psychiatry*, 60(9), 1096-1104.

⁷ Merrefield, Clark. (October 2, 2024). [Do child access prevention laws prevent gun violence? Here’s what the research says](#). *The Journalist’s Resource*.

⁸ Sepic, Matt. (May 24, 2023). [St. Paul City Council passes ordinance requiring gun owners to lock up firearms](#). *MPR News*.

⁹ Sepic, Matt. (May 24, 2023). [St. Paul City Council passes ordinance requiring gun owners to lock up firearms](#). *MPR News*.

¹⁰ Stokes, Kyle. (May 23, 2023). [Gun rights advocates brush off St. Paul’s firearm storage ordinance, which will likely pass the City Council this week](#). *MinnPost*.

Washington, D.C., ordinance that also required trigger locks.

‘I’m inclined to believe that the city does not have plans to enforce this ordinance, and wouldn’t be capable of enforcing it if they wanted to,’ said Rob Doar, who leads government affairs for the Gun Owners Caucus. ‘It appears they may be pursuing it for the attention and headlines, despite knowing the ordinance is void and unenforceable.’

‘I have never heard anything so ridiculous,’ Noecker replied. ‘There is no reason why I or anyone else in the city would work so hard on something that is not going to be enforceable.’

Minnesota law allows cities and counties to regulate when and where people can ‘discharge’ firearms — and in St. Paul, [that’s the section of city code](#) where council members have voted to insert gun storage requirements.

[The proposed ordinance](#) forbids anyone from leaving a ‘loaded or unloaded firearm unattended in a location where ... another person who is not an authorized user is likely to gain access’ — including inside a car — unless the gun is secured with a ‘locking device.’

As the proposed ordinance defines the term, a ‘locking device’ could include a biometric lock, trigger lock, barrel lock, gun vault, a locked cabinet or box, or ‘any other appropriate locked container where a key is kept separately.’

Doar said that gun safes are among the most secure methods for storing a firearm. He said trigger locks “offer a slight deterrent, and may be useful at keeping children from accessing them, but most can be bypassed by using simple hand tools.”¹¹

Saint Paul’s [Safe Gun Storage Ordinance](#) changed text:

“RESOLVED, that the City of Saint Paul does hereby ordain:

SECTION 2

[Section 225.01](#) of the Saint Paul Legislative Code is hereby amended to read as follows:

Sec. 225.01. -Definitions.

Loaded shall mean the firearm has ammunition in the chamber or magazine if the magazine is in the firearm.

Locking device shall mean a feature of a firearm or an external device that renders the firearm inaccessible or inoperable, or both. Locking device includes but is not limited to the following: a biometric lock; a trigger lock; a barrel lock; a cylinder lock; a gun vault; a locked cabinet; a locked box; or any other appropriate locked container where a key is kept separately or otherwise is not readily available to other person.

SECTION 3

Section 225.06 of the Saint Paul Legislative Code is hereby amended to read as follows:

¹¹ Stokes, Kyle. (May 23, 2023). [Gun rights advocates brush off St. Paul’s firearm storage ordinance, which will likely pass the City Council this week](#). *MinnPost*.

Sec. 225.06. -Discharge of firearms.

b) *Acts deemed attempt to discharge firearm.* For the purposes of this section, any person who does any of the following acts is guilty of an attempt to discharge a firearm:

(7) The person negligently stores or leaves a loaded or unloaded firearm unattended in a location where the person knows, or reasonably should know, that another person who is not an authorized user is likely to gain access, including a vehicle, unless reasonable action is taken to secure the firearm against said access with a locking device.

~~(78)~~ The person does any other act, with the intent to discharge a firearm, which constitutes a substantial step toward and is more than preparation for the discharge of a firearm.

SECTION 4

c) *Definitions.* For the purpose of this section, the following terms have the meaning given them:

(4) Authorized user means the owner of the firearm or a person who possesses the firearm with permission from the owner, who is at least 18 years old, and is not otherwise unauthorized by Minnesota law.

SECTION 5

This Ordinance shall take force and be in effect thirty (30) days following its passage, approval and publication.”¹²

2. Lincoln, NE

In 2020, a new law mandated that if a gun owner is going to store their gun in their car, the doors must be locked and the gun must be out of sight. By 2021, the impact of this law was unclear, though officers were utilizing it. “In 2020, 34 guns were stolen, that’s a slight increase from the average, and 15 of those thefts resulted in citations for violating the new ordinance. ‘In most of those cases, the car was simply left unlocked,’ Lincoln Police Officer Luke Bonkiewicz said.”¹³

9.36.110 Firearms in Unattended Motor Vehicle; Unlawful.

1. *It shall be unlawful for any person to keep a firearm in a motor vehicle which is not occupied and/or is outside the immediate control of the person responsible for the vehicle unless the motor vehicle is locked and the firearm is not visible from outside the vehicle.*
2. *The provisions of this section shall not apply to members of the Armed Forces of the United States, active or reserve, the National Guard of this state, or Reserve Officers Training Corps, when on duty or training, or peace officers or other duly authorized law enforcement officers, nor shall it apply to vehicles containing firearms that are parked in locked enclosures or buildings, such as garages or other storage facilities.*
3. *Any person violating any provisions of this section for the first or second offense shall be guilty of an infraction. Any person violating any provisions of this section for a third or*

¹² Saint Paul Legislation. [Amending Chapter 225 of the Saint Paul Legislative Code relating to weapons.](#)

¹³ Bischof, Bayley. (February 12, 2021). [LPD hands out 15 tickets for violating new gun storage ordinance in 2020.](#) 10 11 NOW KOLN-KGIN.

subsequent offense shall be guilty of a misdemeanor. (Ord. 20836 §1; October 28, 2019 Ord. 18158 §2; April 7, 2003).

3. San Francisco, CA:

San Francisco requires firearms be kept in a locked container or disabled with a trigger lock.

[SEC. 4512. Firearms located in any residence to be kept in a locked container or disabled with a trigger lock.](#)

(a) **Prohibition.** No person shall keep a firearm within any residence unless the firearm is stored in a locked container or disabled with a trigger lock.

(d) **Lost or Stolen Firearms.** In order to encourage reports to law enforcement agencies of lost or stolen firearms pursuant to Police Code Section [616](#), a person who files a report with a law enforcement agency notifying the agency that a firearm has been lost or stolen shall not be subject to prosecution for violation of Section 4512(a) above.

(e) **Penalty.** Every violation of this Section 4512 shall constitute a misdemeanor and upon conviction shall be punished by a fine not to exceed \$1,000 or by imprisonment in the county jail not to exceed six months, or by both.

4. Davis, CA:

“Safe storage of firearms in residences

Except when carried on the person or when in the close proximity and control of a person, no person shall keep a firearm in any residence unless the firearm is stored in a locked container or the firearm is equipped with a firearm safety device.

Safe storage of firearms in vehicles

No person shall leave a firearm, not including handguns, in an unattended vehicle unless the firearm is stored:

1. In a locked container in the locked trunk of a vehicle.
2. For vehicles with four (4) or more wheels and lacking a trunk, in a locked container that is affixed or secured to the vehicle and underneath a seat, or covered, or otherwise outside of plain view from the outside of the vehicle.
3. For vehicles with fewer than four (4) wheels and lacking a trunk, in a locked container that is permanently affixed to the vehicle.

No person may place, store or leave a firearm, not including handguns, overnight in an unattended vehicle.”¹⁴

5. Healdsburg, CA

“The Healdsburg Municipal Code section [9.16.060](#) places additional restrictions on residents and visitors of Healdsburg pertaining to the safe storage of firearms. All persons are required to keep a firearm within any residence in a locked container or disabled with a trigger lock, unless the firearm is carried upon the person or is otherwise in the immediate control and possession of a person in accordance with applicable local, state and federal law.

Additionally, any person who owns or possess a firearm shall report the theft or loss of the

¹⁴ City of Davis, CA. [Safe Storage of Firearms](#).

firearm to the City of Healdsburg Police Department within 48 hours of the time the persons suspected or new the firearm had been lost or stolen.”¹⁵

6. Lafayette, CA:

“As of January 11, 2023, residents in Lafayette with firearms are required to store them in a locked container or disable them with an appropriate safety device. This does not apply when a firearm is legally carried on the person or is otherwise in their immediate possession and control.”¹⁶ [Ordinance 685](#)

7. Mountain View, CA:

“On March 8, 2022, the City Council unanimously adopted the [Safe Storage of Firearms ordinance](#). The ordinance applies to all firearms, not just handguns. It requires firearms to be stored in a locked container or disabled with a trigger lock when stored in residences. Otherwise, gun owners must have the firearm in their close proximity and control.

For unattended vehicles, firearms must be stored in a locked container in the trunk of a vehicle or in a permanently affixed locked container for vehicles without trunks. The ordinance prohibits guns from being stored in an unattended vehicle overnight.

Violators of the ordinance may face a misdemeanor punishable by fine and/or imprisonment.”¹⁷

8. Seattle, WA:

[Chapter 10.79 - Storage of Firearms](#) “requires gun owners to keep their guns in a locked container when not being carried by them or under their control, and impose fines for crimes committed with an improperly stored gun.

The gun must be secured in a safe, gun safe, gun case, gun cabinet, or lock box that is:

- Designed to fully contain firearms and prevent removal of, and access to, the enclosed firearm;
- Is capable of repeated use;
- May be opened only by a numerical combination consisting of the entry of at least three variables entered in a specific sequence on a keypad, dial or tumbler device; key, magnetic key, or electronic key; or by biometric identification; and
- Be constructed with such quality of workmanship and material that it may not be easily pried open, removed, or otherwise defeated by the use of common tools.

Fines introduced by this legislation:

- Up to \$500 fine (or community service) for failure to store a gun in a locked container.
- Up to \$1,000 fine (or community service) if the unsafely-stored gun is obtained by youth, prohibited individual, or “at-risk person.”
- Up to \$10,000 if the unsafely-stored gun is used to injure, kill or commit a crime.”¹⁸

¹⁵ City of Healdsburg, CA. [Firearm Safety and Safe Gun Storage](#).

¹⁶ Lafayette, CA. [Safe Firearms Storage](#).

¹⁷ City of Mountain View, CA. [Safe Storage of Firearms Ordinance](#).

¹⁸ Seattle. [Seattle’s Responsible Storage Law](#). *Office of the Mayor – Jenny A. Durkan*.

While it appears that Seattle’s 2019 Responsible Storage Law is still currently in their code of ordinances, a similar law in Edmonds, WA (see below) was preempted by state law by the State Supreme Court. Further exploration would be necessary to determine how Seattle’s law is different, and whether or not there are ongoing legal challenges or issues.

9. Edmonds, WA:

Edmonds had a similar ordinance to Seattle adopted in 2018, requiring people to secure guns kept at home and in vehicles. “Gun owners could be subject to a fine of up to \$10,000 if an at-risk person or a child got a hold of an unsecured firearm.” However, after a case was brought against the city, the state [Supreme Court ruled](#) the ordinance was preempted by state law in April 2022. After the ruling, options for the City would likely be limited to voluntary programs. In the Herald Net article, Edmonds city attorney Jeff Taraday said, “There is no aspect of firearm regulation that is left to the cities. Basically the state has preempted the entire field and until the state Legislature changes that law, there is nothing left for cities to regulate in the realm of firearms.”¹⁹

Voluntary Firearm Buyback Programs Examples

Over the decades, many cities have offered voluntary firearm buyback programs where individuals receive various amounts of money for voluntarily turning in firearms to the police department. Generally, the firearms are then melted down, destroying and removing them from circulation.

The goals behind these programs include disposing of unwanted firearms, reducing children’s access to firearms, providing gun safety education, and reducing gun violence. The effectiveness of these programs is still being determined, with studies generally showing limited effect on reducing gun violence, however many agree more research is needed to understand this nuanced issue.^{20, 21, 22& 23}

1. Mukilteo, WA

In February 2024, the city police department hosted it’s third ever gun buyback event, buying back 61 guns with \$5,750 in gift cards. In the past few years, the city budgeted \$7,000 for gun buybacks and safety training.²⁴

2. Hoboken, NJ

At an event in June 2024 residents could voluntarily surrender up to three firearms, with no questions asked. They received the following payments based on the type of firearm:

- Inoperable: \$40 each
- Rifle/Shotgun: \$200 each
- Handgun (semi-automatic/revolver): \$250 each
- Assault Weapon/Illegal: \$350 each

¹⁹ Breda, Isabella. [After court strikes Edmonds gun storage law, city looks at options.](#) *Herald Net*.

²⁰ Merrefield, Clark. (October 21, 2022). [Gun buybacks: What the research says.](#)

²¹ Ferrazares, T., Sabia, J. J., & Anderson, D. M. (2021). [Have US Gun Buyback Programs Misfired?](#) (No. w28763). *National Bureau of Economic Research*.

²² Green, J., Damle, R. N., Kasper, R. E., Violano, P., Manno, M., Nazarey, P. P., ... & Hirsh, M. P. (2017). [Are “goods for guns” good for the community? An update of a community gun buyback program.](#) *Journal of trauma and acute care surgery*, 83(2), 284-288.

²³ Phillips, S. W., Kim, D. Y., & Sobol, J. J. (2013). [An evaluation of a multiyear gun buy-back programme: re-examining the impact on violent crimes.](#) *International Journal of Police Science & Management*, 15(3), 246-261.

²⁴ Andre, Drew. [61 firearms surrendered in under an hour at Mukilteo gun buyback event.](#) *King 5*.

Participants were asked to register in advance for the event, which required listing all firearms on the registration form. Registrants did not need to provide identification and could remain anonymous.²⁵

In total, the Hoboken Police Department collected 166 firearms, including:

- 77 Rifles/Shotguns
- 72 Handguns (semi-automatic/revolver)
- 10 Illegal Weapons (handgun/assault rifle/sawed-off shotgun)
- 7 Inoperable Weapons/other²⁶

3. Rockville, MD

At the third annual voluntary gun buyback event in August 2024, Rockville police collected around 270 firearms. Firearms were accepted without identification with a no-questions-asked policy. Participants had to remain in their vehicle at all times and no walk-ups were allowed. Firearms had to be unloaded and transported in the trunk.

Payments included:

- \$100 Visa gift card for functioning handguns, rifles, and shotguns
- \$200 in Visa gift cards for functioning assault-style weapons and privately manufactured firearms (ghost guns)
- Non-functioning firearms are accepted, but without compensation²⁷

4. Watervliet and Kingston, NY

2024 gun buyback events collected 75 guns (including three assault weapons, 38 handguns, and 31 long guns) in Watervliet and 134 guns in Kingston.²⁸

5. Cleveland, OH

The Cleveland Police Foundation raises the money for the program and then the police collect, inspect, and prepare the firearms for eventual disposal. Firearms are exchanged for gift cards purchased from or donated by local companies and individuals. To date, their Gun Buy Back program has removed over 3,300 operable firearms. The current goal for their campaign is \$15,000 and 150 firearms.²⁹

6. Baltimore, MD

There is a unique example in Baltimore, with the Archdiocese of Baltimore partnering with community leaders to host a gun buyback event which provides a safe and legal way to dispose of firearms. “Last summer, the Archdiocese recovered 362 weapons, including semi-automatic firearms and some guns reported to be stolen. ... The gun owners received between \$100 to \$200 per gun, depending on the model. [The Baltimore Police Department] said once the guns are turned in, they are stored then completely destroyed. ... The Archdiocese joins the Catholic

²⁵ City of Hoboken. (May 30, 2024). [City of Hoboken Announces Gun Buyback Program](#).

²⁶ City of Hoboken. (June 24, 2024). [City of Hoboken Collects More Than 160 Guns During Gun Buyback](#).

²⁷ City of Rockville. (August 2024). [Gun Buyback Event](#).

²⁸ New York State Attorney General. (May 18, 2024). [Attorney General James Announces 75 Guns Turned in at Watervliet Gun Buyback](#).

²⁹ Cleveland Police Foundation. [Annual Gun Buyback](#).

Church in Chicago, New York and other cities that have recently partnered with law enforcement on successful gun buyback events.”³⁰

Voluntary Trigger Lock Example

1. Edmonds, WA

After their safe storage law was repealed due to the State Supreme Court’s ruling (see above), the mayor announced that the City had received a state grant to provide 300 gun locks to Edmonds residents, available for pickup at the Edmonds police station for free.³¹

Police Notification of Failed Background Check Example

1. St. Louis, MO

In 2019, the St. Louis Board of Aldermen passed Bill 106 requiring licensed gun dealers to tell police if someone trying to purchase a gun failed a federal background check. “According to the Board of Aldermen, the City of St. Louis has become the first city in the U.S. to pass such a law.”³² [Ordinance 71041: Gun Background Check](#)

States Without Preemption Examples

Cities within the seven states with some or no firearms preemption laws have created numerous gun regulations including:

- Capacity-based bans³³
- Ammunition regulation³⁴
- Banning “assault weapons”³⁵
- Banning “ghost” gun (privately-made firearms without serial numbers) parts dealer³⁶
- Requiring all guns to be registered³⁷

³⁰ Reece, Janay. (August 10, 2024). [Baltimore Archdiocese hosts second gun buyback event to help keep guns off the streets](#). *CBS News*.

³¹ Breda, Isabella. [After court strikes Edmonds gun storage law, city looks at options](#). *Herald Net*.

³² Cole, Ashley. (November 1, 2019). [St. Louis Board of Aldermen pass one-of-a-kind bill in hopes of reducing gun violence](#). *KSDK*.

³³ City of Chicago Municipal Code: [8-20-085 High capacity magazines and certain tubular magazine extensions – Sale and possession prohibited – Exceptions](#).

³⁴ Giffords Law Center to Prevent Gun Violence. [Ammunition Regulation](#).

³⁵ City of Chicago Municipal Code: [8-20-075 Possession of assault weapons](#).

³⁶ Jackman, Tom. (April 14, 2023). [Philadelphia becomes fourth city to ban largest ghost gun parts dealer](#). *The Washington Post*.

³⁷ Giffords Law Center to Prevent Gun Violence. [Washington DC Gun Laws](#).