No. 19-55376

IN THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

VIRGINIA DUNCAN, ET AL.,
Plaintiffs-Appellees,
v.
XAVIER BECERRA, IN HIS OFFICIAL CAPACITY AS ATTORNEY GENERAL OF THE STATE OF CALIFORNIA,
Defendant-Appellant.

Appeal from the United States District Court
for the Southern District of California, No. 17-cv-1017-BEN-JLB

BRIEF OF TWENTY-TWO STATES AS *AMICI CURIAE* IN SUPPORT OF PLAINTIFFS-APPELLEES ON EN BANC REHEARING

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INTEREST OF *AMICI CURIAE*

This brief is filed on behalf of the states of Arizona, Louisiana, Alabama, Alaska, Arkansas, Georgia, Idaho, Indiana, Kansas, Kentucky, Mississippi, Missouri, Montana, Nebraska, Ohio, Oklahoma, South Carolina, South Dakota, Texas, Utah, West Virginia, and Wyoming (the "Amici States"). The undersigned are their respective states' chief law enforcement or chief legal officers and have authority to file briefs on behalf of the states they represent. The Amici States through their Attorneys General have a unique perspective that will aid the en banc Court.[1]

First, the Attorneys General have experience protecting public safety and citizen interests in states where the affected magazines are lawfully possessed and used. The Amici States the Attorneys General serve are among the forty-one states that permit the standard, eleven plus capacity magazines that California has banned (the "Affected Magazines") and have advanced their compelling interests in promoting public safety, preventing crime, and reducing criminal firearm violence without a magazine ban such as the one here.

The experience in other states shows that the Affected Magazines are common to the point of ubiquity among law-abiding gun owners and their use

[1] The Amici States submit this brief solely as *amici curiae*. The undersigned certifies that no parties' counsel authored this brief, and no person or party other than the undersigned Attorneys General or their offices made a monetary contribution to the brief's preparation or submission.

promotes public safety. Calling the Affected Magazines "large-capacity" is a misnomer—they often hold only in the range of eleven to fifteen rounds (in no way a large absolute number) and come standard with many of the most popular firearms. There is nothing sinister about citizens bearing the Affected Magazines. Law-abiding citizens bearing the Affected Magazines with lawful firearms benefits public safety, counter-balances the threat of illegal gun violence, and helps make our streets safer.

The Amici States believe that in holding California Penal Code 32310 unconstitutional ("the Act") the Court correctly applied the U.S. Constitution, thereby safeguarding the Second Amendment rights of millions of citizens. The Attorneys General submit this brief on behalf of the Amici States they serve to provide their unique perspective on these constitutional questions and further protect the critical rights at issue, including the rights and interests of their own citizens.

The Amici States join together on this brief not merely because they disagree with California's policy choice, but because the challenged law represents a policy choice that is foreclosed by the Second Amendment. States may enact reasonable firearm regulations that do not categorically ban common arms core to the Second Amendment, but the challenged law fails as it is prohibitive rather than regulatory. California should not be allowed to invade its own citizens'

constitutional rights, and this Court should not imperil the rights of citizens in this Circuit and other states with its analysis.

SUMMARY OF ARGUMENT

The Amici States urge the Court to affirm the trial court's decision that the California law banning magazines carrying more than ten rounds of ammunition violates the Second Amendment.

In *Heller*, the U.S. Supreme Court rejected a balancing approach to determine the constitutionality on an outright ban of firearms protected under the Second Amendment. Instead, the Court held that a ban on firearms protected under the Second Amendment was unconstitutional without utilizing any balancing framework. This Court, therefore, should ask only whether government has *banned arms commonly used by law abiding citizens for lawful purposes*. If so, as in *Heller*, *McDonald*, and *Caetano*, the government has violated the Second Amendment.

This Court should not instead apply a balancing approach—like strict scrutiny or intermediate scrutiny—to a ban on arms commonly used by law abiding citizens for lawful purposes. Such an approach would be inconsistent with Supreme Court precedent. Moreover, application of a balancing approach to a ban on protected firearms has understandably been the subject of immense criticism from at least four of the Justices and numerous judges in other circuits.

Application of a balancing test to a categorical ban on protected firearms would also reduce clarity in the law and promote subjectivity.

The enumerated right to bear arms reflected in the Second Amendment is fundamental and predates the Bill of Rights. The right is important to millions of Americans, including many of our citizens living in disadvantaged communities. The arms at issue in these proceedings are commonly used by millions of law-abiding citizens for a myriad of lawful purposes. California's law criminalizes mere possession of commonly-used arms even in the home for self-defense, and therefore the law strikes at the core of the Second Amendment. The trial court and panel decisions both correctly concluded that California's draconian ban retroactively criminalizing even the mere possession of the Affected Magazines is contrary to the Second Amendment. The en banc Court should do the same.

ARGUMENT

I. California's Ban On The Affected Magazines Should Not Be Subject To Any Interest Balancing Test.

A. The Correct Test Under *Heller*.

The Second Amendment states that "the right of the people to keep and bear Arms, shall not be infringed." U.S. Const. amend. II. The Supreme Court made clear over a decade ago that the Second Amendment protects an individual right that "belongs to all Americans," except those subject to certain "longstanding prohibitions" on the exercise of that right, such as "felons and the mentally ill."

District of Columbia v. Heller, 554 U.S. 570, 581, 622, 626-27 (2008); *see McDonald v. City of Chicago*, 561 U.S. 742 (2010) (incorporating the Second Amendment against the states). The Second Amendment right, therefore, belongs to all "law-abiding, responsible citizens." *Heller*, 554 U.S. at 635. In *Heller*, the Supreme Court created a simple test for those "Arms" that enjoy the Constitution's protections: the Second Amendment protects a right to possess "Arms" that are "typically possessed by law-abiding citizens." *Id.* at 624-25. With this formulation, the Supreme Court provided an easily understood and applied test.

Thus, when a law bans possession of an item, under *Heller*, the Court should first ask whether the banned item qualifies as "Arms" under the Second Amendment. If so, the Court should ask only whether the banned item is (1) commonly used, (2) by law abiding citizens, (3) for lawful purposes, including for self-defense or defense of "hearth and home." *See Heller*, 554 U.S. at 624, 635. If so, then the banned item is categorically protected under the Second Amendment and no further analysis is needed. *Id.* at 634-35. This test closely tracks the text of the Second Amendment, and also reflects the American heritage of gun ownership for self-defense as a key component of the American understanding of ordered liberty. *See id.* at 628-29.

B. An Interest Balancing Approach Would Be Inconsistent With *Heller* And Its Progeny.

In the aftermath of *Heller*, this Court strayed from the simple test set forth therein (it was not the only court to do so). Instead of asking whether the item banned is commonly used by law-abiding citizens for lawful purposes, the Court created an indeterminate and value-laden, sliding scale balancing test. *See Silvester v. Harris*, 843 F.3d 816, 821 (9th Cir. 2016). Under that test, the Court first makes a value judgment about whether the law or regulation at issue, even a categorical ban, places a severe burden on the Second Amendment right. *See id.* Even those that do still may survive under strict scrutiny. *See id.* Those that the Court determines do not place a severe burden on the Second Amendment right are subject to intermediate scrutiny, which requires a significant, substantial or important government interest and a reasonable fit between the challenged regulation and the asserted objective. *See id.* at 821-22.

Applying an interest-balancing test to a ban on firearms commonly used by law-abiding citizens for lawful purposes would be inconsistent with *Heller* and its progeny. Justice Breyer, in dissent in *Heller*, argued that the Court should adopt an "interest-balancing inquiry" that "asks whether the statute burdens a protected interest in a way or to an extent that is out of proportion to the statute's salutary effects upon other important governmental interests." 554 U.S. at 689-90. Justice Scalia, for the majority, rejected such an inquiry, explaining that the Second

Amendment "takes out of the hands of government—even the Third Branch of Government—the power to decide on a case-by-case basis whether the right is *really worth* insisting upon." *Id.* at 634. The Second Amendment "elevates above all other interests the right of law-abiding, responsible citizens to use arms in defense of hearth and home." *Id.* at 635.

Just two years later, in *McDonald*, Justice Breyer, again in dissent, questioned the propriety of incorporating the Second Amendment against the states when doing so would require judges to make difficult empirical judgments. 561 U.S. at 922-25. Justice Alito's controlling opinion for the Court rejected Justice Breyer's suggestion that a balancing test would apply: "As we have noted, while [Justice Breyer's] opinion in *Heller* recommended an interest-balancing test, the Court specifically rejected that suggestion." *Id.* at 791; *see id.* at 811 (Thomas, J., concurring) (discussing the phrase "deeply rooted in this Nation's history and tradition" as a key component of the correct test).

Similarly, in *Caetano v. Massachusetts*, the Court, without employing a balancing test, rejected a decision from the Supreme Judicial Court of Massachusetts upholding a ban on the possession of stun guns.[2] 136 S. Ct. 1027,

[2] On remand, the Supreme Judicial Court overturned the ban, reasoning that "we now conclude that stun guns are 'arms' within the protection of the Second Amendment. Therefore, under the Second Amendment, the possession of stun guns may be regulated, but not absolutely banned." *Ramirez v. Massachusetts*, 94 N.E.3d 809, 815 (Mass. 2018).

1027-28 (2016); *see id.* at 1031 (Alito, J., concurring) ("[T]he relative dangerousness of a weapon is irrelevant when the weapon belongs to a class of arms commonly used for lawful purposes.").

Numerous judges have noticed the conflict between an intermediate scrutiny or interest-balancing test and the test announced in *Heller*. *See, e.g.*, *Heller v. District of Columbia* (*Heller II*), 670 F.3d 1244, 1271 (D.C. Cir. 2011) (Kavanaugh, J., dissenting) ("In my view, *Heller* and *McDonald* leave little doubt that courts are to assess gun bans and regulations based on text, history, and tradition, not by a balancing test such as strict or intermediate scrutiny."); *Ass'n of N.J. Rifle & Pistol Clubs Inc. v. Att'y Gen. of N.J.*, 974 F.3d 237, 262 (3d Cir. 2020) (Matey, J., dissenting) (expressing "serious doubts" that the Court's test "can be squared with *Heller*"); *Ass'n of N.J. Rifle & Pistol Clubs Inc. v. Att'y Gen. of N.J.*, 910 F.3d 106, 128-29 (3d. Cir. 2018) (Bibas, J., dissenting) (criticizing the majority's "balancing approach" because "the *Heller* majority rejected it"); *Binderup v. Att'y Gen. of the U.S.*, 836 F.3d 336, 378 (3d Cir. 2016) (en banc) (Hardiman, J., concurring in part) ("Applying some form of means-end scrutiny in an as-applied challenge against an absolute ban … eviscerates that right [to keep and bear arms] via judicial interest balancing in direct contravention of *Heller*."); *Mance v. Sessions*, 896 F.3d 390, 394-95 (5th Cir. 2018) (Elrod, J., dissenting from denial of en banc rehearing) ("Simply put, unless the Supreme Court instructs us

otherwise, we should apply a test rooted in the Second Amendment's text and history—as required under *Heller* and *McDonald*—rather than a balancing test like strict or intermediate scrutiny.").

These numerous judges are correct. While some other circuits have also chosen to implement a balancing test to govern cases such as this one, *see United States v. Marzzarella*, 614 F.3d 85, 97 (3d Cir. 2010); *Kachalsky v. Cty. of Westchester*, 701 F.3d 81, 89 n.9 (2d Cir. 2012), those circuits erred, misreading the Supreme Court's precedent. Again, the Second Amendment "takes out of the hands of government—even the Third Branch of Government—the power to decide on a case-by-case basis whether the right is really worth insisting upon." *Heller*, 554 U.S. at 634. The *Heller* test provides the appropriate framework for analyzing the fundamental rights protected in the Second Amendment.

C. An Interest Balancing Approach Would Reduce Clarity In The Law And Promote Subjectivity.

American citizens and state legislatures deserve a clear standard they can utilize to readily determine the line that government cannot cross when regulating "arms," as well as the materials required for "arms" to function, such as the Affected Magazines. The district court below was correct when it described the balancing approach as "an overly complex analysis that people of ordinary intelligence cannot be expected to understand"—a test that "obfuscates" more than aids understanding. *Duncan v. Becerra*, 265 F. Supp. 3d 1106, 1117 (S.D. Cal.

2017). The *Heller* test, by contrast, is rooted in objective historical and current evidence of the prevalence of "arms" and their use by law-abiding citizens in America, as well as the plain text of the Second Amendment, making for "a test that anyone can figure out." *Id.*

While some may write the Second Amendment off as a relic of a bygone era, in reality, the ability to defend one's self remains essential to millions of Americans. The panel majority correctly recognized that the Second Amendment has been particularly useful in guarding the possibility of self-defense in many disadvantaged communities. "Our country's history has shown that communities of color have a particularly compelling interest in exercising their Second Amendment rights." *Duncan v. Becerra*, 970 F.3d 1133, 1155 (9th Cir. 2020). The same is true for women; guns can serve as a force equalizer and allow women to protect themselves more effectively against "abusers and assailants." *Id.*; *see also* Daniel Peabody, *Target Discrimination: Protecting the Second Amendment Rights of Women and Minorities*, 48 Ariz. St. L.J. 883, 910-13 (2016). Similarly, those in high-crime communities where law enforcement is stretched thin—or worse, where police are afraid to enter at all—often cannot rely on the government for prompt protection against criminals and so highly value the right to own weapons for self-defense. *Duncan*, 970 F.3d at 1161; *see also McDonald*, 561 U.S. at 790 ("If [petitioners are correct], the Second Amendment right protects the rights of

minorities and other residents of high-crime areas whose needs are not being met by elected public officials.").

"A constitutional guarantee subject to future judges' assessments of its usefulness is no constitutional guarantee at all." *Heller*, 554 U.S. at 634. To fully protect fundamental constitutional rights, a total ban on their exercise, like that California has imposed here, must not be subjected to imprecise balancing tests based on "a variety of vague ethico-political First Principles whose combined conclusion can be found to point in any direction the judges favor." *McDonald*, 561 U.S. at 804 (Scalia, J., concurring). Allowing a ban on the exercise of a fundamental right to rise and fall based on the policy assessment of judges—even when those judges are wise and well-meaning—runs counter to the basic idea of the Bills of Rights and needlessly injects greater uncertainty. *See United States v. Virginia*, 518 U.S. 515, 567 (1996) (Scalia, J., dissenting) ("These [tiers of scrutiny] are no more scientific than their names suggest, and a further element of randomness is added by the fact that it is largely up to [the Supreme Court] which test will be applied in each case.").

Applying an "intermediate scrutiny" or even a "strict scrutiny" test is particularly inapt in the case of a *ban* on a class of "Arms" protected under the Second Amendment. Applying typical safety concerns to such a ban could easily result in a "balancing test" that leads to the conclusion that banning otherwise

protected firearms is acceptable. Indeed, California is urging the Court to reach such a conclusion in this case. But, as explained above, the Supreme Court flatly rejected such a conclusion in both *Heller* and *McDonald*. As Justice Alito later explained, this is because "the relative dangerousness of a weapon is irrelevant when the weapon belongs to a class of arms commonly used for lawful purposes." *See Caetano*, 136 S. Ct. at 1031 (Alito, J., concurring). In other words, the Founders already performed the balancing of interests and concluded that the need for self-defense, against both criminals and potential tyranny, outweighs the safety risk of firearms commonly possessed by law-abiding citizens. *Heller*, 554 U.S. at 635. The Court should reject California's request to have the Court reconsider the Founders' conclusion enshrined in the Second Amendment.

II. The Act Is Unconstitutional Because It Is A Categorical Ban On "Arms" Commonly Used By Law-Abiding Citizens For Lawful Purposes.

State legislatures have broad discretion in crafting policy, but not in conflict with the text of the Constitution. California's outright ban on Affected Magazines strikes at the core of the Second Amendment. The panel majority, consistent with other decisions from the Court, correctly held that the Affected Magazines are "Arms" under the Second Amendment. The Affected Magazines are also commonly used by law-abiding citizens for lawful purposes, including in defense of hearth and home.

Thus, when California enacted such a statewide and retroactive ban on the mere possession of the Affected Magazines, it destroyed the core of the Second Amendment right. And when such destruction occurs, interests should not be balanced.[3] *See Young v. Hawaii*, —F.3d—, No. 12-17808, 2021 WL 1114180, *11 (9th Cir. Mar. 24, 2021) (en banc) ("If a regulation 'amounts to a destruction of the Second Amendment right,' it is unconstitutional under any level of scrutiny[.]"); *see id.* at *68 (O'Scannlain, J., dissenting) ("Under our court's framework, if Hawaii's law 'amounts to a destruction' of the core right, it must be held 'unconstitutional under any level of scrutiny.'").

Possessing Affected Magazines is an integral aspect of the right to "keep and bear arms" and regulating their possession implicates the core of the Second Amendment. *See Fyock v. City of Sunnyvale*, 779 F.3d 991, 999 (9th Cir. 2015) ("Because Measure C restricts the ability of law-abiding citizens to possess large-capacity magazines within their homes for the purpose of self-defense, we agree with the district court that Measure C may implicate the core of the Second Amendment."); *see also Luis v. United States*, 136 S. Ct. 1083, 1097 (2016) (Thomas, J., concurring) ("The right to keep and bear arms ... implies a corresponding right to obtain the bullets necessary to use them."). Indeed, this

[3] This, of course, does not mean that California cannot regulate the possession or use of Affected Magazines, particularly when those regulations are consistent with prior longstanding regulations on the right to keep and bear arms.

Court has rejected an illusory distinction between firearms and ammunition, noting that a regulation on the latter does not fall "outside the historical scope of the Second Amendment." *Jackson v. City & Cty. of San Francisco*, 746 F.3d 953, 967-68 (9th Cir. 2014) ("[R]estrictions on ammunition may burden the core Second Amendment right of self-defense."). Thus, that California has banned magazines, and not the firearms for which they are needed, does not alter the constitutional analysis.

As for commonality, the district court and panel majority correctly concluded that the Affected Magazines are essential to bearing arms in that they are standard and integral to some of the most popular firearms in America. *See Ass'n of N.J. Rifle & Pistol Clubs*, 974 F.3d at 256 (Matey, J., dissenting) (collecting sources demonstrating the popularity and ubiquity of the Affected Magazines). The Affected Magazines are commonly used in many handguns, which the Supreme Court has recognized as the "quintessential self-defense weapon." *Heller*, 554 U.S. at 629. The panel majority, which observed that the Affected Magazines constitute nearly half of all magazines in the United States, was correct in determining that the Affected Magazines are commonly owned and used. *See Heller II*, 670 F.3d at 1261 ("We think it clear enough in the record that semi-automatic rifles and magazines holding more than ten rounds are indeed in 'common use,' as the plaintiffs contend" because "fully 18 percent of all firearms

owned by civilians in 1994 were equipped with magazines holding more than ten rounds, and approximately 4.7 million more such magazines were imported into the United States between 1995 and 2000."). By banning the mere possession of magazines necessary to operate millions of guns, including some of the most widely-used guns in America, California has essentially banned use of those guns, including in the home for self-defense.

Moreover, use of Affected Magazines is not a new phenomenon; as the panel majority explained, magazines holding more than ten rounds have existed for centuries. *See Ass'n of N.J. Rifle & Pistol Clubs*, 974 F.3d at 257-58 (Matey, J., dissenting) (analyzing the history of regulations on the Affected Magazines and concluding that it "reveals a long gap between the development and commercial distribution of magazines, on the one hand, and limiting regulations, on the other hand"). And government regulation of large capacity magazines is of relatively recent vintage. *See id.* at 258 ("Yet regulations did not grow until the 1990s and 2000s, and even today, only a handful of states limit magazine capacity.").

It is evident, therefore, that the Act fails under the Second Amendment because it is a categorical ban on the possession of Affected Magazines, which are "Arms." Here, like in *Heller*, the state has outlawed a class of arms "overwhelmingly chosen by American society for [the] lawful purpose [of self-defense]." *Heller*, 554 U.S. at 628. Moreover, California's ban reaches into the

home, where "Second Amendment guarantees are at their zenith." *Kachalsky*, 701 F.3d at 89; *see also McDonald*, 561 U.S. at 780 (right to keep and bear arms applied "most notably for self-defense within the home"). Therefore, just as the district court and panel majority did, the en banc Court should hold California's ban unconstitutional.[4]

CONCLUSION

For the foregoing reasons, Amici States respectfully request that the Court hold that the Act is unconstitutional under the Second Amendment.

April 1, 2021

Respectfully submitted,

/s/ Michael S. Catlett

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[4] As the panel opinion correctly held and Appellees explain, a statewide ban on the possession of Affected Magazines such as that California adopted also fails under the intermediate or strict scrutiny tests.

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CERTIFICATE OF COMPLIANCE

Pursuant to Fed. R. App. P. 29(a)(4)(G) and Fed. R. App. P. 32(g)(1), the undersigned hereby certifies that this brief complies with the type-volume limitations of Fed. R. App. P. 32(a)(7)(B)(i) and Fed. R. App. P. 29(a)(5).

1. This brief is 3,665 words excluding the portions exempted by Fed. R. App. P. 32(f), if applicable.
2. This brief has been prepared in a proportionally spaced typeface using Microsoft Word 2010 in 14-point Times New Roman type, which complies with Fed. R. App. P. 32(a)(5) and (6).

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CERTIFICATE OF SERVICE

I hereby certify that on this April 1, 2021, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit using the appellate CM/ECF system. Counsel for all parties to the case are registered CM/ECF users and will be served by the appellate CM/ECF system.

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