



# Cuccinelli and His Caucus Are Bad for Public Safety

Charles Posner and Emma Shapiro    September 24, 2013

Virginia is no stranger to gun violence. On April 16, 2007, Seung-Hui Cho, a student at Virginia Tech University, opened fire on the campus, killing 32 people and wounding 17 in the deadliest mass shooting by a single gunman in American history.<sup>1</sup> Even though Cho had a history of mental illness, he was able to circumvent the background check system—which is filled with loopholes—and purchase the guns he used in the massacre. Specifically, Cho was able to pass a background check because Virginia failed to submit his mental-health records and tens of thousands of other records to the FBI background check database.<sup>2</sup>

Since the Virginia Tech massacre, the state has submitted thousands of missing records to the background check system,<sup>3</sup> but Virginia still does not require universal background checks for all firearm sales. The measure to expand background checks came up one vote short in the Virginia State Senate this year.<sup>4</sup> Virginia unfortunately continues to make it easy for criminals, gun traffickers, and the mentally ill to buy guns with no questions asked—online, at state gun shows, almost anywhere.

This issue brief details the prevalence of gun violence in Virginia, outlines current Virginia gun law, and shows how Virginia Attorney General Ken Cuccinelli and his caucus are bad for public safety in the state.

---

## Virginia's high rates of gun crime

While the Virginia Tech shooting is an infamous instance of gun violence in the state, Virginia experiences gun violence daily. A Center for American Progress report from April shows that Virginia has the 19th-highest level of gun violence in the country across 10 different measures.<sup>5</sup> From 2001 through 2010, Virginia ranked over the national average for total firearm deaths per 100,000 people with 8,262 total people killed.<sup>6</sup> That's more than one and a half times the number of U.S. combat deaths in the Iraq and Afghanistan wars combined.<sup>7</sup>

What's worse, women are at an especially high risk of gun violence in Virginia. In the first two years of Ken Cuccinelli's tenure as Virginia attorney general from 2009 to 2011, the state rose from having the 24th-highest rate of women murdered by guns to the 9th-highest rate.<sup>8</sup> The number of women in Virginia murdered by guns in 2010 was more than 50 percent higher than the number for 2008.<sup>9</sup> And when it comes to domestic violence against women, Virginia ranks even worse: The state has the fifth-highest rate of murders with a single female victim and single male offender—a key indicator of domestic violence.<sup>10</sup>

---

## Gun trafficking from Virginia kills Virginians and people all over America

Virginia's weak gun laws are fueling much of the crime in the state and all over the country. Because of these weak laws, criminals in Virginia overwhelmingly use guns originally sold in the state. In fact, more than 80 percent of guns recovered in Virginia crimes were originally sold by Virginia gun dealers.<sup>11</sup>

Virginia's weak laws also make the state a top source for gun traffickers, who pick up guns in Virginia and sell them to criminals in other states. A Mayors Against Illegal Guns study analyzing Bureau of Alcohol, Tobacco, Firearms and Explosives, or ATF, data found that in 2010, only 10 states supplied nearly half of the crime guns that had crossed state lines.<sup>12</sup> Virginia was one of those states.

Virginia exports crime guns at a rate more than two times the national average.<sup>13</sup> Furthermore, a recent study of crime guns recovered in New York City revealed that 90 percent of those guns came from out of state and more came from Virginia than any other state.<sup>14</sup> The Law Center to Prevent Gun Violence gives Virginia a "D" grade based on the strength of its gun laws.<sup>15</sup>

---

## Gun violence hurts Virginia economically

While gun violence has an incalculable human and emotional cost, it also has an economic impact on the state. The costs of the Virginia Tech massacre, for example, totaled \$48.2 million for U.S. taxpayers, Virginia taxpayers, and Virginia Tech, a public university. The cost to taxpayers specifically was \$22.25 million, of which 99 percent was paid for by Virginia taxpayers.<sup>16</sup>

---

## Cuccinelli has worked against common-sense gun regulation

Instead of helping to strengthen Virginia’s gun laws to make it harder for criminals, gun traffickers, and the mentally ill to access firearms—as well as reduce the human and economic costs to the state—Ken Cuccinelli has worked to strip away reasonable regulations on gun ownership, hamper law enforcement, and conceal crucial data regarding guns. He does not represent the public interest of Virginians, voting against background checks on gun sales even when Virginians overwhelmingly support background checks—including support from 91 percent of gun owners.<sup>17</sup>

Cuccinelli’s extensive work against common-sense public safety policy has effectively made it easier for criminals to access guns and harder for law enforcement to do their jobs.

---

## Cuccinelli has opposed expanded gun background checks

Federally licensed firearm dealers are required to administer a criminal background check on all gun purchasers—a five-minute procedure that helps keep guns out of the hands of criminals and other dangerous people. But so-called private sales—sales between private individuals rather than a sale from a federally licensed dealer, which frequently include sales at gun shows—are exempt from the background check requirement, although these sales make up as many as 40 percent of all firearm sales.<sup>18</sup> This loophole enables dangerous individuals who are prohibited from gun ownership, such as the Virginia Tech shooter, to easily purchase guns with no questions asked.<sup>19</sup>

The Virginia Tech review panel—comprised of eight nationally recognized and respected individuals with a wide variety of expertise in law enforcement, education, and the justice system—has called for expanding gun background checks in Virginia at least to include all private sellers at gun shows.<sup>20</sup> More than 35 current and former Virginia police chiefs have also backed this effort, citing the ability for dangerous people to avoid the law and access guns.<sup>21</sup>

But instead of following the lead of the review panel and these chiefs of police to protect Virginia’s public safety, Cucinnelli has been protecting the right of felons, fugitives, and domestic abusers to buy guns with no questions asked. In 2009, Cuccinelli voted against legislation that would close the gun show loophole by requiring a background check on every gun that changes hands at Virginia gun shows.<sup>22</sup>

---

## Cuccinelli has weakened safeguards in concealed carry laws

Many Virginians support the idea that responsible, law-abiding citizens should be able, with proper training, to get a permit to carry a concealed firearm for self-defense.<sup>23</sup> In 1995, the state legislature and Republican Gov. George Allen passed a comprehensive law with bipartisan support to create such a concealed carry permitting system.<sup>24</sup>

The hallmark of Ken Cuccinelli's time in the state legislature and as attorney general, however, has been a concerted, relentless effort to undermine the safeguards that were built into the system. Perhaps out of allegiance to extreme elements of the gun lobby, Cuccinelli has repeatedly acted to reduce protections against dangerous people carrying guns, undermine safety and training requirements, and expand concealed carry to bars and schools—places where the original framers of the legislation never intended for guns to be present. He weakened the safeguards so much that it is now possible to obtain a permit online without requiring students to handle a gun. He also made it easier for non-Virginians to get a Virginia concealed carry permit. The primary beneficiaries of this practice include Robert Marcus, who runs the Concealed Carry Institute—an outfit that offers online training—and Bob's Gun Shop; they have given more than \$30,000 to Cuccinelli.<sup>25</sup>

Lax concealed carry laws increase the risk that dangerous individuals who threaten public safety will be permitted to carry concealed, loaded guns in public. Over the course of the past decade, nobody has done more to undermine the safeguards in Virginia's concealed carry system than Cuccinelli:

- **2003:** Cuccinelli sponsored legislation that would have eliminated the requirement that out-of-state permit holders meet Virginia requirements for issuance if they want to carry in the commonwealth.<sup>26</sup> This would have effectively nullified Virginia state gun laws that require a certain threshold of training and clearance in order to carry a concealed gun in public.
- **2004:** Cuccinelli sponsored legislation that would have forced privately owned restaurants and clubs to allow guns in the door, including establishments that serve alcohol.<sup>27</sup>
- **2005:** Cuccinelli sponsored legislation that would have eliminated law enforcement discretion in the concealed carry permit process.<sup>28</sup> Thus, if law enforcement officers have reasonable suspicion that an applicant should not receive a permit, the law would still require them to issue one.
- **2006:** Cuccinelli voted in favor of legislation eliminating the ability of localities to require fingerprints as part of an application for a concealed carry permit.<sup>29</sup>

- **2008:** Cuccinelli voted in favor of legislation that would have permitted individuals who do not have a concealed carry permit to carry a firearm in a private vehicle, as long as it was in a locked container or compartment.<sup>30</sup> This would have allowed citizens without the training and clearance required to get a concealed carry permit to have guns in public places.
- **2009:** Cuccinelli voted in favor of legislation, which became law, that restricts public access to information regarding concealed carry permit holders and therefore impedes legitimate efforts by law enforcement and other agencies to use this information.<sup>31</sup>
- **2009:** Cuccinelli sponsored legislation, which became law, that weakens the requirement that applicants for a concealed carry license complete a handgun safety course by allowing that requirement to be met with an online course.<sup>32</sup> (That’s like letting somebody get a driver’s license without first getting behind the wheel to learn how to drive.)

---

### Cuccinelli has acted as an activist attorney general

As Virginia attorney general, Cuccinelli has continued his pursuit of undermining reasonable—and constitutional—restrictions on firearms in his issuance of advisory opinions and intervention in federal litigation. Cuccinelli has taken an activist approach to this issue as attorney general, stepping far beyond the bounds of the type of restrained advocacy required by the position in order to advance his conservative political agenda regarding firearms. Most recently, Cuccinelli has pushed to allow guns in churches<sup>33</sup> and concealed weapons on college campuses,<sup>34</sup> and has worked to end a 19-year-old provision limiting the number of one’s monthly handgun purchases, or the “one-handgun-a-month” law.

- **2011:** Cuccinelli issued an advisory opinion stating that individuals with concealed carry permits could legally carry firearms in places of worship, despite a state law to the contrary, as long as they believed it was necessary for “personal protection.”<sup>35</sup>
- **2011:** Cuccinelli issued an advisory opinion stating that a University of Virginia policy prohibiting the possession of firearms inside university buildings did not function to prevent concealed carry permit holders from carrying concealed firearms into those buildings.<sup>36</sup>
- **2012:** Cuccinelli filed an amicus brief in federal court urging that a Maryland state law that gives law enforcement the ability to apply a “good and substantial reason” test prior to issuing a concealed carry permit be struck down, despite the lack of any connection between the litigation and the state of Virginia.<sup>37</sup>

---

## The gun lobby rewards Cuccinelli

Cuccinelli's positions against reasonable gun legislation and policies have caught the attention of the National Rifle Association, or NRA, which has not only granted him an "A+" rating and endorsed him for statewide office but has also featured him as a speaker at member events and singled him out for an award:

- **2009:** The NRA endorsed Cuccinelli for Virginia attorney general and gave him an "A+" rating.<sup>38</sup>
- **2012:** The NRA presented Cuccinelli with the "Defender of the Constitution Award" at the Conservative Political Action Conference.<sup>39</sup>

---

## The Cuccinelli caucus

Ken Cuccinelli is unfortunately not alone in his views. Many Republican legislators in Virginia also favor laws that promote reckless gun ownership instead of responsible gun ownership and laws that make it easier for criminals to buy guns with no questions asked. Since the last election for the state's House of Delegates, two measures were approved that move Virginia away from sensible gun ownership policies. They include:

- **Repeal of Virginia's one handgun purchase a month limit, H.B. 940.** Current Attorney General candidate Mark Obenshain (R) supported the bill as state senator.<sup>40</sup> Additionally, 63 Republican Delegates opposed the handgun limit,<sup>41</sup> despite polls showing that 66 percent of Virginians support it.<sup>42</sup>
- **Obstruction of law enforcement gun buyback programs, H.B. 22.** Obenshain also supported this bill as state senator,<sup>43</sup> and 66 Republican Delegates supported the measure.<sup>44</sup>

Mark Obenshain's worst vote against law enforcement was in 2009, when he voted against a bill to expand criminal background checks at all gun shows—a measure that would have made it harder for criminals and the mentally ill to purchase guns.<sup>45</sup> Obenshain's opposition to the measures is perhaps less surprising given the financial backing he has gotten from a gun dealer who is among the top suppliers of guns to criminals in the entire commonwealth. This year, the Obenshain campaign accepted a \$5,000 contribution from Robert G. Marcus, the owner of Bob's Gun Shop in Norfolk.<sup>46</sup> Bob's Gun Shop was identified by a 2010 *Washington Post* investigation as one of the top suppliers of guns used in Virginia crimes.<sup>47</sup>

---

## Conclusion

Gun violence is an epidemic in Virginia. Every day, an average of two to three people are gunned down in the state, leaving behind family, friends, neighbors, and communities that must endure the tragedies in their wake.<sup>48</sup>

No laws will ever eliminate all of these senseless acts of violence, but there are reasonable steps that Virginia can take to cut down on this violence: laws that make it harder for convicted felons to get their hands on guns; laws that make it less likely for a bar fight to turn fatal; and laws that protect the law enforcement officers charged with protecting Virginia citizens.

Ken Cuccinelli and his caucus have demonstrated that they are against these laws. They would instead choose to continue on the path they have been heading down for more than a decade—a path toward a state that does not distinguish between responsible gun ownership and reckless gun ownership.

---

## Acknowledgments

We would like to thank Chelsea Parsons and Arkadi Gerney for their invaluable assistance with this paper.

## Endnotes

- 1 Anthony Green and Donna Cooper, "Auditing the Cost of the Virginia Tech Massacre" (Washington: Center for American Progress, 2007), available at <http://www.americanprogress.org/issues/guns-crime/report/2012/04/12/11382/auditing-the-cost-of-the-virginia-tech-massacre/>.
- 2 Ibid.
- 3 "Only some states follow post-Va. Tech law against mentally ill having guns," *The Blade*, February 17, 2011, available at <http://www.toledoblade.com/Nation/2011/02/17/Only-some-states-follow-post-Va-Tech-law-against-mentally-ill-having-guns.html>.
- 4 Virginia State Senate, "SB 1136 Firearm transfers; penalties" (2013), available at <http://lis.virginia.gov/cgi-bin/legp604.exe?ses=131&typ=bil&val=sb1136>.
- 5 Arkadi Gerney, Chelsea Parsons, and Charles Posner, "America Under the Gun" (Washington: Center for American Progress, 2013), available at <http://www.americanprogress.org/wp-content/uploads/2013/03/AmericaUnderTheGun.pdf>.
- 6 Ibid.
- 7 Office of the Assistant Secretary of Defense, Operation Iraqi Freedom (OIF) U.S. Casualty Status (U.S. Department of Defense, 2013), available at <http://www.defense.gov/NEWS/casualty.pdf>.
- 8 Centers for Disease Control and Prevention, "Fatal Injury Data," available at <http://www.cdc.gov/injury/wisqars/fatal.html> (last accessed August 2013).
- 9 Ibid.
- 10 Violence Policy Center, "When Men Murder Women: An Analysis of 2010 Homicide Data" (2012), available at <http://www.vpc.org/studies/wmmw2012.pdf>.
- 11 U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives, Virginia (U.S. Department of Justice, 2012), available at <https://www.atf.gov/sites/default/files/assets/statistics/tracedata-2012/2012-trace-data-virginia.pdf>.
- 12 Mayors Against Illegal Guns, "Trace the Guns: The Link Between Gun Law and Interstate Gun Trafficking" (2010), available at <http://tracetheguns.org/report.pdf>.
- 13 Trace The Guns, "Virginia had the 7th Highest Rate of Crime Gun Exports in 2009," available at <http://tracetheguns.org/#/states/VA/exports/> (last accessed August 2013).
- 14 Dan Friedman, "Under Fire From Bloomberg on Guns, Virginia Gov. Bob McDonnell's Factual Response Misfires," *Daily News*, August 2, 2013, available at <http://www.nydailynews.com/new-york/guns-nyc-va-gov-facts-straight-article-1.1416476>.
- 15 Law Center to Prevent Gun Violence, "Virginia State Law Summary," available at <http://smartgunlaws.org/virginia-state-law-summary/> (last accessed August 2013).
- 16 Green and Cooper, "Auditing the Cost of the Virginia Tech Massacre."
- 17 Ariel Edwards-Levy, "Background Checks Overwhelmingly Supported by Gun Owners in 4 States," *The Huffington Post*, January 31, 2013, available at [http://www.huffingtonpost.com/2013/01/31/background-checks\\_n\\_2590495.html](http://www.huffingtonpost.com/2013/01/31/background-checks_n_2590495.html).
- 18 Philip J. Cook and Jens Ludwig, "Guns in America: Results of a Comprehensive National Survey on Firearm Ownership and Use" (Washington: Police Foundation, 1996), available at <http://www.policefoundation.org/sites/pftest1.drupalgardens.com/files/Cook%20et%20al.%20%281996%29%20-%20Guns%20in%20America.pdf>.
- 19 "Columbine, 11 Years Later," *The New York Times*, April 17, 2010, available at <http://www.nytimes.com/2010/04/18/opinion/18sun4.html>.
- 20 Commonwealth of Virginia, "Chapter VI Gun Purchases and Campus Policies" (2009), available at <http://www.governor.virginia.gov/tempcontent/techPanelReport-docs/10%20CHAPTER%20VI%20GUN%20PURCHASE%20AND%20CAMPUS%20GUN%20POLICIES.pdf>.
- 21 Reed Williams, "Law Enforcement Officials Back Closing 'Gun-Show Loophole,'" *Richmond Times-Dispatch*, January 18, 2013, available at [http://www.timesdispatch.com/news/law-enforcement-officials-back-closing-gun-show-loop-hole/article\\_b00ffaac-d4fa-539e-9759-945cc98fbfd.html](http://www.timesdispatch.com/news/law-enforcement-officials-back-closing-gun-show-loop-hole/article_b00ffaac-d4fa-539e-9759-945cc98fbfd.html).
- 22 Virginia State Senate, "SB 1257 Firearms; criminal records check performed at a gun show before vendor may transfer" (2009), available at <http://lis.virginia.gov/cgi-bin/legp604.exe?ses=091&typ=bil&val=sb1257>.
- 23 Law Center to Prevent Gun Violence, "Polling on Background Checks/Gun Shows/Private Sales," September 10, 2012, available at <http://smartgunlaws.org/category/gun-studies-statistics/polling-data-on-guns/>.
- 24 Sam Howe Verhovek, "States Seek to Let Citizens Carry Concealed Weapons," *The New York Times*, March 6, 1995, available at <http://www.nytimes.com/1995/03/06/us/states-seek-to-let-citizens-carry-concealed-weapons.html?pagewanted=all&src=pm>.
- 25 Julian Walker, "Online test boosts out-of-state demand for Va. Permits," *The Virginian-Pilot*, May 14, 2013, available at <http://hamptonroads.com/2013/05/online-test-boosts-outofstate-demand-va-permits>.
- 26 Virginia State Senate, "SB 771 Concealed handgun permits" (2003), available at <http://lis.virginia.gov/cgi-bin/legp604.exe?ses=031&typ=bil&val=sb771>.
- 27 Virginia State Senate, "SB 579 Concealed weapons; abolishes prohib. on carrying in a rest. or club, excep. when alcohol consumed" (2004), available at <http://lis.virginia.gov/cgi-bin/legp604.exe?ses=041&typ=bil&val=sb579>.
- 28 Virginia State Senate, "SB 1226 Concealed weapons permit; disqualifies person using negligently or unlawfully to endanger others" (2005), available at <http://lis.virginia.gov/cgi-bin/legp604.exe?ses=051&typ=bil&val=sb1266>.
- 29 Virginia State Legislature, "SB 58 Concealed handgun permit applications; removes option for locality to require fingerprints" (2006), available at <http://lis.virginia.gov/cgi-bin/legp604.exe?ses=061&typ=bil&val=sb58>.
- 30 Virginia State Legislature, Vote on SB 436, "Concealed weapons; allows person to carry in private motor vehicle, etc. if locked in container" (2008), available at <http://lis.virginia.gov/cgi-bin/legp604.exe?ses=081&typ=bil&val=sb436>.
- 31 Virginia State Legislature, "HB 2144 Concealed handgun permit applications; access to personal information" (2009), available at <http://lis.virginia.gov/cgi-bin/legp604.exe?ses=091&typ=bil&val=hb2144>.
- 32 Virginia State Legislature, "SB 1528 Concealed handgun permits; completion of firearms training, etc., may be done electronically" (2009), available at <http://leg1.state.va.us/cgi-bin/legp504.exe?ses=091&typ=bil&val=sb1528>.
- 33 Julian Walker, "Cuccinelli concludes guns in church are legal," *PilotOnline.com*, April 12, 2011, available at <http://hamptonroads.com/2011/04/cuccinelli-concludes-guns-church-are-legal>.
- 34 Daniel de Vise, "Cuccinelli: U.Va. may not bar concealed weapons," *The University of Virginia Magazine*, July 19, 2011, available at [http://uvamagazine.org/top\\_university\\_news/article/cuccinelli-u-va\\_may\\_not\\_bar\\_concealed\\_weapons#.Uh43whtea5o](http://uvamagazine.org/top_university_news/article/cuccinelli-u-va_may_not_bar_concealed_weapons#.Uh43whtea5o).
- 35 Letter from Attorney General Kenneth T. Cuccinelli to Delegate Mark L. Cole, April 8, 2011, available at <http://oag.state.va.us/Opinions%20and%20Legal%20Resources/OPINIONS/2011opns/11-043%20cole.pdf>.

- 36 Letter from Attorney General Kenneth T. Cuccinelli to Sen. Emmett W. Hanger, July 1, 2011, available at <http://oag.state.va.us/Opinions%20and%20Legal%20Resources/Opinions/2011opns/11-078-Hanger.pdf>.
- 37 Brief of Amicus Curiae in support of plaintiffs, Raymond Woollard, et al., v. Denis Gallagher (2012) (No. 12-1437), available at [http://www.ag.virginia.gov/Media%20and%20News%20Releases/News\\_Releases/Cuccinelli/Amicus\\_Brief\\_Woollard\\_Ct\\_Filed.pdf](http://www.ag.virginia.gov/Media%20and%20News%20Releases/News_Releases/Cuccinelli/Amicus_Brief_Woollard_Ct_Filed.pdf).
- 38 "NRA-PVF Endorses Ken Cuccinelli for Virginia Attorney General," NRA-ILA, October 1, 2009, available at <http://www.nra-ila.org/news-issues/news-from-nra-ila/2009/nra-pvf-endorses-ken-cuccinelli-for-vir.aspx?s=%22Ken+Cuccinelli%22&st=&ps=>.
- 39 Karyn McDermott, "Cuccinelli receives 'Defender of the Constitution' Award," Examiner.com, February 9, 2012, available at <http://www.examiner.com/article/cuccinelli-receives-defender-of-the-constitution-award>.
- 40 Virginia State Senate, "HB 940 Handguns; eliminates prohibition on purchasing more than one in a 30-day period" (2012), available at <http://leg1.state.va.us/cgi-bin/legp504.exe?121+vot+SV0363HB0940+HB0940>.
- 41 Delegates who opposed the limit are: Richard Anderson, Richard Bell, Robert Bell, Kathy Byron, Benjamin Cline, Mark Cole, Barbara Comstock, John Cosgrove, John Cox, Kirk Cox, Anne Crockett-Stark, Mark Dudenhefer, James Edmunds, Matthew Fariss, Peter Farrell, T. Scott Garrett, Todd Gilbert, Tag Greason, Greg Habeeb, Chris Head, Gordon Helsel, Keith Hodges, Tim Hugo, Salvatore Iaquinto, Riley Ingram, Chris Jones, Terry Kilgore, Barry Knight, Steve Landes, Scott Lingamfelter, Manoli Loupassi, Daniel Marshall, Robert Marshall, Jimmie Massie, Don Merricks, Paula Miller, Randy Minchew, Will Morefield, Richard Morris, John O'Bannon, Israel O'Quinn, Robert Orrock, Chris Peace, Brenda Pogge, Charles Poindexter, David Ramadan, Margaret Ransone, Roxann Robinson, Nick Rush, Edward Scott, Beverly Sherwood, Chris Stolle, Bob Tata, Ron Villanueva, Lee Ware, Michael Watson, Michael Webert, Tony Wilt, Thomas Wright, David Yancey, Joseph Yost, William Howell. Virginia State House, "HB 940 Handguns; eliminates prohibition on purchasing more than one in a 30-day period" (2012), available at <http://leg1.state.va.us/cgi-bin/legp504.exe?121+vot+HV0370+HB0940>.
- 42 Olympia Meola, "Poll finds most Virginians oppose changes in abortion, gun laws," TimesDispatch.com, February 19, 2012, available at [http://www.timesdispatch.com/archive/poll-finds-most-virginians-oppose-changes-in-abortion-gun-laws/article\\_91356f75-4cc5-5133-91a2-c5bfc9d4bac1.html](http://www.timesdispatch.com/archive/poll-finds-most-virginians-oppose-changes-in-abortion-gun-laws/article_91356f75-4cc5-5133-91a2-c5bfc9d4bac1.html).
- 43 Virginia State Senate, "HB 22 Firearms; disposition thereof acquired by localities" (2012), available at <http://leg1.state.va.us/cgi-bin/legp504.exe?121+vot+SV0511HB0022+HB0022>.
- 44 Delegates who supported the measure are: David Albo, Richard Anderson, Richard Bell, Robert Bell, Kathy Byron, Benjamin Cline, Mark Cole, Barbara Comstock, John Cosgrove, John Cox, Kirk Cox, Anne Crockett-Stark, Mark Dudenhefer, James Edmunds, Matthew Fariss, Peter Farrell, T. Scott Garrett, Todd Gilbert, Tag Greason, Greg Habeeb, Chris Head, Gordon Helsel, Keith Hodges, Tim Hugo, Salvatore Iaquinto, Riley Ingram, Matthew James, Chris Jones, Terry Kilgore, Barry Knight, Steve Landes, Jim LeMunyon, Scott Lingamfelter, Manoli Loupassi, Daniel Marshall, Robert Marshall, Jimmie Massie, Joe May, Don Merricks, Paula Miller, Randy Minchew, Will Morefield, John O'Bannon, Idrael O'Quinn, Robert Orrock, Chris Peace, Brenda Pogge, Charles Poindexter, Harry Purkey, David Ramadan, Margaret Ransone, Roxann Robinson, Nick Rush, Thomas Rust, Edward Scott, Beverly Sherwood, Chris Stolle, Bob Tata, Ron Villanueva, Lee Ware, Michael Watson, Michael Webert, Tony Wilt, Thomas Wright, David Yancey, Joseph Yost, William Howell. Virginia State House, "HB 22 Firearms; disposition thereof acquired by localities" (2012), available at <http://leg1.state.va.us/cgi-bin/legp504.exe?121+vot+HV1499+HB0022>.
- 45 Virginia State Senate, "SB 1257 Firearms; criminal records check performed at a gun show before vendor may transfer" (2009), available at <http://lis.virginia.gov/cgi-bin/legp604.exe?091+vot+SV0227SB1257+SB1257>.
- 46 Virginia Public Access Project, "Obenshain for Attorney General - Mark," available at [http://www.vpap.org/committees/profile/money\\_in\\_donors/3548?end\\_year=2013&filing\\_period=all&filter\\_schedule=A&industry=all&locality=all&lookup\\_type=year&max\\_years=15&order=amount&page=2&start\\_year=2013&submenus=pacs&zip\\_code=all](http://www.vpap.org/committees/profile/money_in_donors/3548?end_year=2013&filing_period=all&filter_schedule=A&industry=all&locality=all&lookup_type=year&max_years=15&order=amount&page=2&start_year=2013&submenus=pacs&zip_code=all) (last accessed September 2013); Bob's Gun Shop, "Robert G. Marcus," available at [http://www.bobsgunshop.com/180\\_50\\_listings.html](http://www.bobsgunshop.com/180_50_listings.html) (last accessed September 2013).
- 47 David S. Fallis, "Virginia Gun Dealers: Small number supply most guns tied to crimes," The Washington Post, October 24, 2010, available at <http://www.washingtonpost.com/wp-dyn/content/article/2010/10/24/AR2010102402221.html>.
- 48 Centers for Disease Control and Prevention, "Fatal Injury Reports, National and Regional, 1999 - 2010," available at [http://webappa.cdc.gov/sasweb/ncipc/mortrate10\\_us.html](http://webappa.cdc.gov/sasweb/ncipc/mortrate10_us.html) (last accessed August 2013).