



**Second  
Amendment  
Foundation**

**Self Defense  
Public Records  
Investigation**



"The Common Sense Gun Lobby"

**CCRKBA**

CITIZENS COMMITTEE FOR THE  
RIGHT TO KEEP AND BEAR ARMS

*A special joint project of the Second Amendment Foundation  
and the Citizen's Committee for the Right to Keep and Bear Arms*

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**Responding agency:** California Department Of Justice, Firearms Division

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This is a request to the California DOJ Firearms Division for copies of electronic records of CCW ("Carry Concealed Weapons") permits issued by local police and sheriff's agencies pursuant to Penal Code 12050-12054 (and specifically NOT records of 12027 et al law enforcement issuance).

During the summer of 2002, conversations between our project staffer Jim March and various DOJ-Firearms personnel established that DOJ-F keeps a database of permitholders in some sort of large, professional database system. The data can be "exported" to a "database text file" such as CSV (Comma Separated Value) or it's equivalent.

We are asking for that data, **redacted** electronically to remove all data EXCEPT the following:

- 1) First and last name of the permitholder (in whatever format the data is currently stored in).
- 2) The issuing agency (we assume this is usually a police or sheriff's office).
- 3) Dates of issuance or renewal that are currently recorded in the database. If something is "missing in the database yet present in paper records", we want only the default electronic record.
- 4) The "occupation" of each permitholder.
- 5) The city of residence of each permitholder.
- 6) The "permit type" **or** the number of years the permit is good for, however that data is stored. By law, permits for ordinary citizens are good for 2 years, judges for 3 years, police/deputy reservists for 4 years...so if it's just a single-digit number for years it's good for, we can calculate what we need from that. It's also possible the database contains the dates of issuance and "next renewal date", giving the year period of issuance and hence the "permit type" info that way - we can accept that form of the info too.

We ask DOJ to redact any of the following: employer and employer-related info, home street address, phone numbers, California driver's license, social security, firearm make/model/serial info, etc. We feel that this data is NOT public record for privacy and identity theft risk reasons.

We believe that DOJ staff in one of two methods can easily generate this data:

A) If convenient, DOJ staff can “export” the specific “fields” we need (as described above) via control of the original large-scale database program where the data is held – in other words, tell the original database to only export specific fields to a Comma Separated Values file (CSV) or similar.

B) If the above would require programming or is otherwise annoying and/or time-consuming, have the original database export the entire data file out to CSV. DOJ personnel can then import the data into a Microsoft Excel “spreadsheet”; once there, entire vertical “columns” of material to be redacted by clicking on the “column letter” to be redacted (highlighting the entire column), then a single “delete key” hit renders that data gone from top to bottom. Hence each vertical column of data to be redacted takes one mouse click and one hit of the delete key. The data should then be exported back out to CSV from Excel because an Excel file sometimes “secretly stashes” deleted data within it’s own file format – CSV export from Excel will solve that and produce a clean file of known content.

(Various estimates of the number of permitholders we are aware of range from 39,000ish to 45,000ish. As Excel can handle 65,000 records, we are confident that Excel can serve as a simple “10 minute redacting tool” to avoid a DOJ programming job on the main database.)

Regardless of how redacted, we want the data in electronic form on CD-ROM or equivalent PC-readable format (floppy, etc), Emailed an attachment or made available via FTP, at DOJ’s option.

### **Why we need the data.**

We are conducting a widespread investigation into the practices (and malpractices) behind CCW issuance. To this end, we are using the California Public Records Act as improved by Proposition 59 to make inquiries of local records held at police and sheriff’s departments. However, we need the DOJ records referred to above too, for the following reasons:

1) We need the DOJ data as an auditing tool. We have had agencies withhold subsets of the permitholder rosters before, illegally – several are claiming that the names of issued reservists are confidential under Government Code 6254(u) when this is clearly not the case. Agencies might also be severely tempted to withhold the names of “cronies” of various sorts. DOJ’s data requested above can be cross-referenced against local records. Please recall that the California Supreme Court in *CBS v. Block* determined that the “unfettered discretion” in the process could lead to abuses, hence the possibility of covering up such abuses must be recognized.

2) We need to do a statewide review of racial and gender discrimination in the permit process. To this end, we need to analyze the DOJ master name roster for feminine first names and Latino surnames. To get this data from local agencies and do a comprehensive statewide survey would require time and resources we don’t have. We plan on filing “local agency PRARs” on CCW data with a selection of agencies, not all 58 sheriffs and 300 or so (?) police departments.

3) Due DOJ’s layout of the statewide standard CCW application form, one piece of public record (“occupation”) is found on a page otherwise studded with highly confidential data such as social security number, home address and the like (page 11). If we have the “occupation” record from DOJ in electronic form, we can clarify that the local agency PRAR response need only consist of page #3 and page #13 from the forms (plus any separate “good cause” supporting statements/documents). This will make sure we don’t get highly confidential details useful for identity thieves and the like, and significantly reduce our copying costs. Note that we have filed one PRAR with a local agency that produced the complete unredacted file on 34 permitholders, a violation of privacy we did not ask for and consider an abuse against the permitholders in question.