

# C A L I F O R N I A DEPARTMENT OF JUSTICE

# AB 2552 GUN SHOW REPORT 2024



# Introduction

This report is the second annual California Department of Justice (DOJ) Gun Show Report, pursuant to Assembly Bill (AB) 2552 (Stats. 2022, ch. 696). Effective July 1, 2023, AB 2552 requires DOJ to inspect at least half of all gun shows in California each year.

This report summarizes information about DOJ's inspection and enforcement efforts conducted at gun shows in California during the reporting period spanning January 1, 2024 – December 31, 2024.

#### AB 2552 Requirements

AB 2552 imposed new requirements for gun show producers and vendors.<sup>1</sup> These requirements were designed to improve the safety of gun shows and the communities in which they occur by preventing the sale of illegal firearms or the sale of firearms to prohibited persons, and by reducing the proliferation of unserialized ghost gun kits and components.

#### **Requirements for Vendors and Producers**

Effective January 1, 2023, AB 2552:

- Requires vendors who wished to participate at gun shows to certify in writing to a DOJ-licensed gun show producer that they would not display, possess, or offer for sale any unserialized firearm frame or receiver, including any unfinished frame or receiver, or any attachment or conversion kit designed to convert a handgun into a short-barreled rifle or assault weapon.<sup>2</sup>
- Re-emphasizes that the sale of firearm precursor parts at a gun show or event must be conducted in accordance with all applicable state and federal laws.<sup>3</sup>
- Requires gun show producers to post additional notices at each public entrance to a gun show informing attendees about specified laws and responsibilities, including California's laws requiring firearms to be safely stored to prevent children from gaining unsupervised access.<sup>4</sup>
- Increases penalties for gun show producers who willfully violate California laws governing gun shows.<sup>5</sup>

#### **DOJ's Responsibilities**

AB 2552 also expanded and required DOJ's inspection and enforcement authority with respect to Californian gun shows.

Pursuant to AB 2552, California law requires DOJ to:

- Conduct enforcement and inspection activities of at least half of all gun shows or events held in California each year, commencing July 1, 2023.<sup>6</sup>
- Post information on DOJ's website regarding violations of Penal Code section 27310, subdivision

   (a) discovered during these inspection activities.<sup>7</sup>

<sup>1</sup> See AB 2552 (Stats. 2022, ch. 696), amending California Penal Code sections 27240, 27245, 27305, 27310, and 27350.

<sup>2</sup> Cal. Pen. Code, § 27305 (as amended by AB 2552).

<sup>3</sup> Cal. Pen. Code, § 27310(a) (as amended by AB 2552).

<sup>4</sup> Cal. Pen. Code, § 27240(a) (as amended by AB 2552).

<sup>5</sup> Cal. Pen. Code, § 27245 (as amended by AB 2552).

<sup>6</sup> Cal. Pen. Code, § 27310(c).

<sup>7</sup> Cal. Pen. Code, § 27310(d).

• Submit a report to the Legislature by May 1, 2024, and annually thereafter, summarizing DOJ's gun show enforcement and inspection activities.<sup>8</sup>

#### Summary of Data for 2024

- Field Representatives in the DOJ's Bureau of Firearms (BOF) inspected 31 out of a total of 51 gun shows in 2024; these inspections occurred across 15 counties.
- During those inspections, BOF recorded a total of 211 violations by gun show producers, firearms dealers, and ammunition vendors. All violations were documented in inspection reports and licensees were advised of actions they needed to take to correct violations and be in compliance with applicable laws. Field Representatives requested assistance from BOF Special Agents at five gun shows where vendors and individuals were suspected of being in possession of assault weapons. These enforcement interactions ultimately resulted in arrests and/or criminal charges
- Of the 211 violations, 137 (65%) were by gun show producers, 69 (33%) by firearm dealers, and five (2%) by ammunition vendors.
- The highest number of violations recorded during a single gun show was 28.
- Of the different types of violations, the highest percentage were for missing or invalid gun show warning signs that are required under Penal Code section 27240.
- Of the counties in which gun shows occurred, the highest number of violations were at gun shows that occurred within Kern County.
- The number of violations sharply decreased over the course of the year, going from its peak of 92 violations in February 2024 to zero recorded violations in June 2024 and October 2024, and only one violation in November 2024.

As required by Penal Code section 27310, subdivision (d), information about more recent gun show violations can be found on DOJ's website at https://oag.ca.gov/firearms/ab2552.

<sup>8</sup> Cal. Pen. Code, § 27310(e).

### **Overview of Gun Shows**



#### What are Gun Shows?

Federal law defines a "gun show or event" as a "function sponsored by any national, state, or local organization, devoted to the collection, competitive use, or other sporting use of firearms, or an organization or association that sponsors functions devoted to the collection, competitive use, or other sporting use of firearms in the community."<sup>9</sup> California laws governing gun shows incorporate this federal definition.<sup>10</sup>

Gun shows are held at various types of venues where vendors gather to, among other things, display, market, and/or sell firearms, ammunition, firearm accessories, and non-firearm products. Researchers have estimated that on average, over 2,000 gun shows are held nationwide each year.<sup>11</sup> In California, 51 gun shows occurred in 2021, 59 occurred in 2022, 46 occurred in 2023, and 51 occurred in 2024.

#### **Gun Shows and Firearm Trafficking**

In many other states, gun shows are relatively unregulated and may feature both licensed dealers, who are required to conduct background checks to sell firearms under federal law, as well as many *unlicensed* sellers offering firearms, ammunition, and related products without background checks, sale records, or other safety requirements. As a result, without appropriate precautions and oversight, these events may become a magnet for prohibited purchasers and gun traffickers.<sup>12</sup>

Researchers have documented, for instance, that gun shows may become an "intermediate source of crime guns, supplying organized gun trafficking operations and surrogate or 'straw' purchasers who in turn supply criminal end users."<sup>13</sup> In a 2000 report, the federal Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) found that 30% of all guns linked to federal gun trafficking prosecutions had been sold at a gun show.<sup>14</sup>

Under California law, sales and transfers of firearms and sales of ammunition, must generally be conducted by or processed through licensed firearm dealers or ammunition vendors, whether or not those sales or transfers are conducted at a gun show.<sup>15</sup> These licensees are responsible for conducting background checks and ensuring compliance with other requirements.<sup>16</sup>

<sup>9 27</sup> C.F.R. § 478.100(b).

<sup>10</sup> See Cal. Pen. Code, §§ 27200(a); 26805(b).

See David Pérez Esparza, et al., "Examining a Dataset on Gun Shows in the US, 2011-2019," *Journal of Illicit conomies and Development*, 4(1): 86-96 (Sep. 2022), <u>https://jied.lse.ac.uk/articles/10.31389/jied.146</u>.

<sup>12</sup> See, e.g., Garen Wintemute, "Inside Gun Shows: What Goes on When Everybody Thinks Nobody's Watching," UC Davis Violence Prevention Research Program (Sep. 2009), <u>https://health.ucdavis.edu/vprp/pdf/Wintemute\_ InsideGunShows.pdf</u>; Garen Wintemute, et al., "Gun Shows and Gun Violence: Fatally Flawed Study Yields Misleading Results," Am. Journal of Public Health, 100(10), 1856-60 (Oct. 2010); Chelsea Parsons, et al., "The Bureau and the Bureau," pp. 57-63, Center for American Progress (Spring 2015), <u>https://cdn.americanprogress.org/content/</u> uploads/2015/05/31061036/ATF-report-webfinal2.pdf; Giffords Law Center to Prevent Gun Violence, "Gun Shows", <u>https://giffords.org/lawcenter/gun-laws/policy-areas/gun-sales/gun-shows/</u>.

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 See id.; Garen Wintemute, et al., "Gun Shows and Gun Violence: Fatally Flawed Study Yields Misleading Results," Am. Journal of Public Health, 100(10), 1856-60 (Oct. 2010).

<sup>14</sup> See id. and Chelsea Parsons, et al., "The Bureau and the Bureau," pp. 57-63, Center for American Progress (Spring 2015), <u>https://cdn.americanprogress.org/content/uploads/2015/05/31061036/ATF-report-webfinal2.pdf</u> (citing Bureau of Alcohol, Tobacco, and Firearms (ATF), "Following the Gun: Enforcing Federal Laws against Firearms Traffickers pp. 14, 17 (2000)).

<sup>15</sup> See, e.g., Cal. Pen. Code, §§ 27310(a); 27315.

<sup>16</sup> Id.

However, in recent years, BOF Special Agents have encountered illicit sales of firearms, ammunition, and firearm-related products at gun shows. For example, Special Agents have observed dealers illegally selling assault weapons and large capacity magazines, and have arrested convicted felons who purchased firearms, ammunition, or firearm parts:

- In September 2021, BOF Special Agents arrested a convicted felon for purchasing ghost gun parts and a magazine at a gun show.<sup>17</sup>
- In August 2022, Special Agents arrested a firearms dealer who illegally sold assault weapons at a gun show.
- In October 2022, Special Agents observed a convicted felon purchase ghost gun parts at a gun show, and after investigating the person further, discovered multiple ghost guns and 3-D printers to manufacture ghost guns at the person's residence.<sup>18</sup>
- In April 2023, Special Agents observed several vendors selling large capacity magazines and illegal weapons, all of which were seized.
- In April 2023 and August 2023, Special Agents investigated two convicted felons who were observed purchasing firearms or ammunition at gun shows.<sup>19</sup>

It must be noted that this report does not present data about *all* illegal activity that BOF Special Agents uncover and investigate in connection with gun shows, but rather, focuses primarily on violations by gun show producers, firearm dealers, and ammunition vendors, as well as private individuals selling illegal weapons, identified through inspection and enforcement activities required by AB 2552.

Additionally, over the past decade, prior to July 2022, companies and individuals increasingly sought to circumvent California's background check and other gun safety laws by selling unserialized ghost gun kits and related components, including partially unfinished frames and receivers. The sale of ghost guns and related components without a background check to determine whether an individual is prohibited from possessing a firearm is harmful to protecting our communities, and without a serial number the firearm cannot be traced if needed in the future. These ghost gun products were increasingly sold at gun shows and other venues before California enacted a package of new laws in 2022, including AB 2552, to comprehensively strengthen oversight and regulation of the ghost gun industry and regulate the sale of firearm precursor parts.<sup>20</sup>

#### DOJ's Role at Gun Shows

**Field Representatives:** BOF's Regulatory Compliance Unit (RCU) has teams of Field Representatives who travel to DOJ-approved gun shows. They conduct in-person inspections of the shows and their licensed producers, as well as the firearm dealers, ammunition vendors, and manufacturers who participate or conduct sales to ensure they are in compliance with all applicable firearm laws.

**Special Agents:** BOF's Enforcement Branch has teams of Special Agents throughout the state who regularly conduct enforcement efforts at in-state gun shows to identify and deter illegal firearms and ammunition transactions at these venues. Due to the proliferation of illegal firearms, such as ghost guns and large capacity magazines in California, partly due to the purchase of these items at out-of-state gun shows, Special Agents interdict convicted felons, criminal gang members, and firearm trafficking organizations that purchase these items out-of-state and transport them into California. DOJ is the only state law enforcement agency in California that specifically targets criminal activity at gun shows and has the resources and expertise to do so.

18 See <u>2022 APPS Report</u> (pgs. 55-56).

20 See AB 1621 (2022), AB 2156 (2022), and AB 1594 (2022).

<sup>17</sup> See <u>2021 APPS Report</u> (p. 53).

<sup>19</sup> The details of these examples can be found on DOJ's <u>Gun Show Enforcement</u> webpage.



# **Data Points**

#### **Number and Locations of Gun Show Inspections**

BOF Field Representatives completed a total of 31 inspections in 2024. Table 1 lists the 31 gun shows that were inspected, the county where they took place, and the number of violations found at each.

- Five of these inspections were carried out in Fresno County.
- Four inspections were carried out in San Bernardino County.
- Three inspections were carried out in Sacramento County.
- El Dorado, Kern, Los Angeles, Orange, San Diego, Solano, and Tehama counties had two inspections each.
- Butte, Humboldt, Merced, San Joaquin, and Santa Clara counties each had one gun show inspection during this time period.

The highest number of violations recorded during a single gun show was 28 at a gun show in Kern County. There were no violations recorded at 11 of the gun shows that were inspected.

# Table 1: Number of Violations and Locations of Inspections Carried Out, by Number of Recorded Violations, 2024

Date	County	Gun Show (Gun Show Producer)	Violations Recorded
3/16/2024	Kern	Central Valley Sportsmen's Boat & RV Show (Michael Hatcher)	28
2/3/2024	El Dorado	Placerville Gun Show (Buck Stop Gun Shows)	27
1/6/2024	San Bernardino	San Bernardino Gun Show (Crossroads of the West)	20
3/30/2024	Orange	Costa Mesa Gun Show (Crossroads of the West)	20
2/17/2024	Kern	Bakersfield Gun Show (Crossroads of the West)	19
2/24/2024	Butte	Big Chico Gun Show (D&S Productions)	14
2/3/2024	Solano	Vallejo Gun Show (S&N Promotions)	12
2/4/2024	Fresno	Fresno Gun Show (California Gun Shows)	12
3/17/2024	Fresno	Fresno Gun Show (JLJR, LLC)	12
3/2/2024	San Diego	San Diego Gun Show (JLJR, LLC)	11
3/2/2024	Merced	Los Banos Gun Show (California Gun Shows)	9
2/18/2024	San Joaquin	Lodi Gun Show (California Gun Shows)	8

3/9/2024	San Bernardino	Ontario Gun Show (Crossroads of the West)	5
1/27/2024	San Bernardino	Ontario Gun Show (Crossroads of the West)	4
8/3/2024	Humboldt	Loleta Gun Show (D&S Productions)	3
3/10/2024	Los Angeles	Lancaster Gun Show (Great Gun Shows)	2
4/20/2024	Sacramento	Sacramento Gun Show (Great Gun Shows)	2
1/21/2024	Orange	Costa Mesa Gun Show (Crossroads of the West)	1
5/5/2024	Solano	Vallejo Gun Show (S&N Promotions)	1
11/16/2024	Santa Clara	Santa Clara Gun Show (JLJR, LLC)	1
1/7/2024	Sacramento	Sacramento Gun Show (California Gun Show)	0
3/24/2024	Tehama	Red Bluff Gun Show (D&S Productions)	0
5/18/2024	Fresno	Fresno Gun Show (JLJR, LLC)	0
6/1/2024	San Diego	Escondido Gun Show (JLJR, LLC)	0
6/2/2024	Los Angeles	Lancaster Gun Show (Great Gun Shows)	0
6/9/2024	Fresno	Fresno Gun Show (Great Gun Shows)	0
6/15/2024	Tehama	Red Bluff Gun Show (D&S Productions)	0
6/29/2024	Sacramento	Sacramento Gun Show (Great Gun Shows)	0
8/3/2024	San Bernardino	Ontario Gun Show (Crossroads of the West)	0
10/5/2024	Fresno	Fresno Gun Show (Great Gun Shows)	0
11/3/2024	El Dorado	Placerville Gun Show (S&N Promotions)	0

#### Numbers and Types of Gun Show Inspection Violations

BOF Field Representatives recorded a total of 211 violations by the 62 gun show producers, firearms dealers, and ammunition vendors that were inspected. All licensees found in violation of state laws and/or regulations were issued a Notification of Inspection Findings (BOF Form 08-22) and were advised of actions they needed to take to correct violations and be in compliance with applicable laws. BOF Field Representatives requested assistance from BOF Special Agents during one gun show at which a firearm dealer was suspected of offering an assault weapon for sale, and four additional gun shows during which private citizens were suspected of offering assault weapons for sale. All five instances ultimately resulted in arrests and/or criminal charges.

Figure 1 shows the breakdown of these violations by the type of licensee that committed them (i.e., gun show producer, firearms dealer, ammunition vendor). Of the 211 violations, 137 (65%) related to gun show producers, 69 (33%) related to firearm dealers, and 5 (2%) related to ammunition vendors.

A total of 90 gun show producers, firearms dealers, and ammunition vendors participated in the inspected gun shows — of these, 62 were inspected. Violations were recorded for 25 (40%) of these licensees, which included eight gun show producers and 17 firearms dealers or ammunition vendors. Of the five licensees with the highest number of violations, four were gun show producers and one was a firearm dealer.

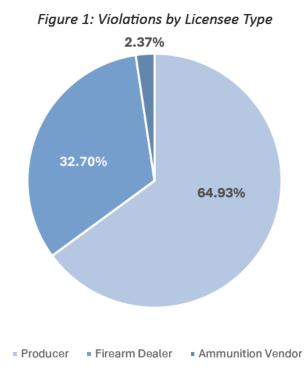


Table 2 shows the top five gun show inspection violation categories along with the number of violations and the percentage they make up within the total number of violations. Together, these top five violation categories make up 71% of all inspection violations from 2024.

Violation Type (Corresponding Penal Code Requirement)		Percentage of Total Violations
Missing/invalid gun show warning signs (Pen. Code, § 27240)	86	40.76%
Gun Show Vendors did not certify in writing that they would not sell prohibited weapons or conversion kits, display loaded firearms, commit hate crimes, or display/possess/sell black powder (Pen. Code, § 27305)	26	12.32%
Incomplete firearm Dealer Record of Sale worksheets (Pen. Code, § 28160)		8.06%
Vendors present at gun show without prior notice to DOJ <sup>21</sup> (Pen. Code, § 27220)		6.16%
Missing/incomplete ammunition Dealer Record of Sale (did not complete ammo DROS) (Pen. Code, § 30352)	12	5.69%

Table 2: Top Five Gun Show Inspection Violations, 2024

21 Gun show producers are required to submit to DOJ a list of firearms dealers and ammunition vendors who will participate at the gun show so DOJ can determine if those prospective vendors have a valid firearms license or ammunition vendor license.

Table 3 demonstrates the top five violation categories for all three licensee types<sup>22</sup>. For ammunition vendors, the top violation category was failure to retain the photocopies of "Federal Limits Apply" identification and proof of lawful presence documentation. For firearm dealers, "Incomplete DROS worksheets" was the category with the highest violation count. For gun show producers, the top violation category was missing/invalid gun show warning signs.

Category	Count	Percentage
Ammunition Vendors		
Photocopies of "Federal Limits Apply" identification and proof of lawful presence documentation are not retained for ammunition purchases (Pen. Code, § 28180)	4	1.90%
Ammunition not secured (Pen. Code, § 30350)	1	0.47%
Firearm Dealers		
Incomplete firearm Dealer Record of Sale worksheets (Pen. Code, § 28160)	17	8.06%
Missing/incomplete ammunition Dealer Record of Sale (did not complete ammo DROS) (Pen. Code, § 30352)	12	5 <b>.69</b> %
Employee(s) do not possess valid Certificate of Eligibility (COE) (Pen. Code, § 26915)	10	4.74%
Photocopies of non-scanned identification not maintained (Pen. Code, § 28180)		3.79%
Government fees are not posted (Pen. Code, § 26880)		2.37%
Event Producers		
Missing/invalid gun show warning signs (Pen. Code, § 27240)		40.76%
Gun Show Vendors did not certify in writing that they would not sell prohibited weapons or conversion kits, display loaded firearms, commit hate crimes, or display/ possess/sell black powder (Pen. Code, § 27305)		12.32%
Vendors present at gun show without prior notice to DOJ (Pen. Code, § 27220)		6.16%
List of employees/other persons working in the display space not provided to/ maintained by the producer (Pen. Code, § 27320)		2.37%
Missing name tags (Pen. Code, § 27325)	5	2.37%

#### Table 3: Top 3 Violation Categories by Licensee Type

#### Number of Violations by County

Figure 2 shows the number of violations by county. A total of 211 violations were recorded.<sup>23</sup> Gun shows that occurred in Kern County had 47 recorded violations, the most of any county. Gun shows occurring in San Bernardino and El Dorado Counties follow Kern County with 26 and 23 violations, respectively. Although the raw counts are useful to illustrate the distribution of violations incurred by gun shows that took place in a particular county, a more accurate measure of violations occurring in gun shows by county would be violations per inspection by county, since some counties had more gun show inspections than others.

Figure 3 shows the number of violations per inspection, by county. Factoring in the number of inspections changes the violation count rankings. When the numbers of inspections are considered,

<sup>22</sup> Since ammunition vendors were only associated with a total of five violations, the table shows the top two categories where violations were recorded.

<sup>23</sup> Violations per county had a mean of 15.7 violations and a median of 11.

gun shows occurring in Kern, Butte and El Dorado Counties have the top number of violations with 23.5, 14, and 13.5 violations, respectively. Gun shows occurring in San Bernardino County, which ranked number two in terms of total violation counts, ranks number seven when the numbers of inspections are considered.

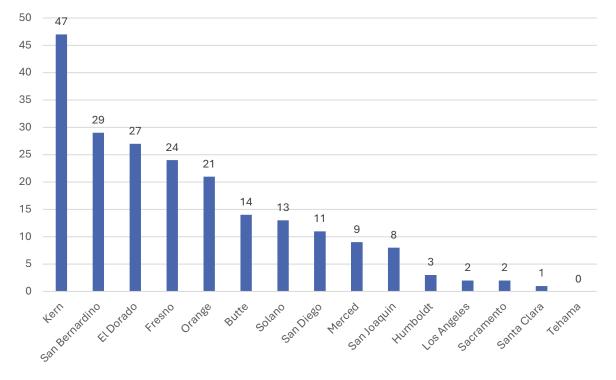
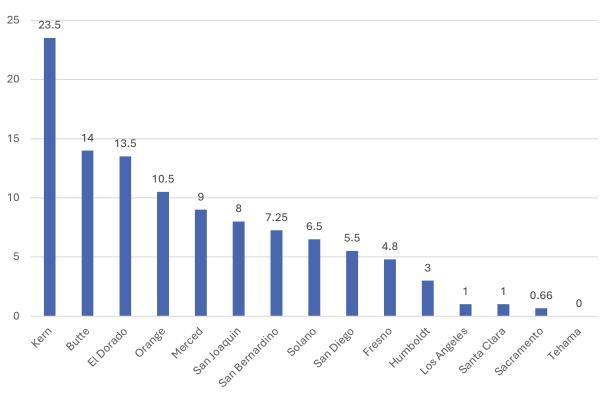


Figure 2: Number of Violations by County

Figure 3: Average Number of Violations per Inspection, by County



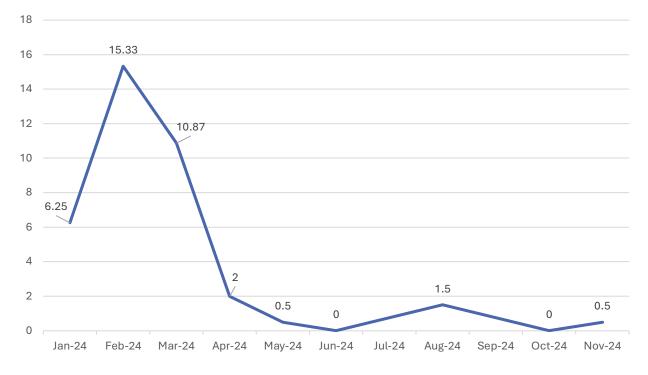
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The prior tables and figures focused on the aggregate number of gun show inspection violations. However, Figure 4 demonstrates violation counts over time by grouping violations based on the month the inspection was conducted to uncover any time trends that are present in the data.

The analysis investigates the number of violations per inspection by month because only looking at violations might be influenced by the number of inspections conducted. For instance, if a greater number of inspections were conducted in the first months of 2024 as opposed to the latter months, violations may incorrectly seem more frequent in the earlier months.

As demonstrated in Figure 4, the number of violations sharply decreased over the course of the 2024 calendar year, going from its peak of 15.3 in February, to 0 recorded violations in June and October, to only  $0.5^{24}$  violations per inspection in November, when the last inspection was conducted.

This downward trend suggests that inspection efforts have reduced the number of violations as gun show producers and vendors become better educated via inspection efforts and thus more compliant with the applicable laws. This analysis is supported by the anecdotal observations of DOJ Field Representatives who conduct the gun show inspections. The Field Representatives are often approached by vendors during gun shows to address their questions, even when a compliance inspection is not being conducted. This suggests that the gun show producers and vendors look to the DOJ for education and training on how to comply with applicable laws and regulations, and additionally suggests that compliance with such laws increased simply by DOJ's presence at gun shows. DOJ's inspection program will continue to be critical in ensuring the safety of gun shows and the communities in which they occur by regulating the sale of illegal firearms or the sale of firearms to prohibited persons and ensuring compliance with all applicable laws.



#### Figure 4: Average Number of Violations per Inspection, by Month

# 24 In November of 2024, there were two gun show inspections and one violation, amounting to 0.5 violations per inspection.

# Appendix A: Violation Counts by Type of Violation

Table A1: Number of Violations by Penal Code or Code of Regulation

Violation Description	Count
Missing/invalid show warning signs (Pen. Code, § 27240)	86
Gun Show Vendors did not certify in writing that they would not sell prohibited weapons or conversion kits, display loaded firearms, commit hate crimes, or display/possess/sell black powder (Pen. Code, § 27305)	
Incomplete firearm Dealer Record of Sale (DROS) worksheets (Pen. Code, § 28160)	17
Vendors not on submitted list present at event/show (Pen. Code, § 27220)	13
Missing/incomplete ammunition DROS (did not complete ammo DROS) (Pen. Code, § 30352)	12
Employee(s) do not possess valid Certificate of Eligibility (COE) (Pen. Code, § 26915)	10
List of employees/other persons working in the display space not provided to/maintained by the producer (Pen. Code, § 27320)	8
Photocopies of non-scanned identification not maintained (Pen. Code, § 28180)	8
Government fees are not posted (Pen. Code, § 26880)	5
Missing name tags (Pen. Code, § 27325)	5
Photocopies of "Federal Limits Apply" identification and proof of lawful presence documentation are not retained for ammunition purchases (Cal. Code Regs., tit. 11, § 4045.1)	4
Firearms not secured in a manner to prevent operation (Pen. Code, § 27305)	4
Firearm Safety Certificate (FSC) tests are not retained for five years (Cal. Code Regs., tit. 11,, § 4253)	2
FSC test area is not separate or partitioned (Pen. Code, § 31640)	2
Photocopies of FSC exemptions granted not retained (Pen. Code, § 31700)	2
Firearm acquisitions from private parties not submitted to DOJ (Pen. Code, § 26905)	1
Possession of both a firearm and ammunition allowed by non-exempt person (Pen. Code, § 27330)	1
Unaccompanied minor present at show (Pen. Code, § 27335)	1
Untagged firearm or ammunition on gun show premises (Pen. Code, § 27340)	1
Digital card reader not utilized (Pen. Code, § 28180)	
Ammunition not secured (Pen. Code, § 30350)	1
Licensee in possession of assault weapons (Pen. Code, § 30605)	1