

CALIFORNIA DEPARTMENT OF JUSTICE

**TITLE 11. LAW
DIVISION 5. FIREARMS REGULATIONS
CHAPTER 10. AMMUNITION**

FINAL STATEMENT OF REASONS

UPDATE OF INITIAL STATEMENT OF REASONS

There have been no changes to the information described in the Initial Statement of Reasons.

CORRECTIONS AND NON-SUBSTANTIAL EDITS

The Department has not made changes since the publication of the Notice of Proposed Rulemaking and Initial Statement of Reasons.

SUMMARY OF COMMENTS AND DEPARTMENT RESPONSES

Written comments received during the 45-day public comment period are included in the rulemaking file under Exhibit 7. The Department received the following public comment:

Comment: “I am a small business owner operating under an ammunition vending license. I am writing to express concern that additional regulations and reporting requirements are placing an unnecessary burden on small businesses like mine. I run a small recycling business, www.greenmanammo.com. While I do not sell ammunition, I am still required to file quarterly reports with the State Franchise Tax Board. I have requested a waiver from this requirement, but my request was denied. Additionally, the CDTFA has noted in its records that I am required by the Department of Justice to operate my business under these conditions. There was even an attempt to close my account, though that issue has since been resolved. Given these circumstances, I respectfully request that any new legislation include a provision allowing small business owners to appeal certain regulatory requirements on a case-by-case basis. This would provide flexibility and fairness for businesses that may not fit neatly into standard regulatory categories. Thank you for your time and consideration.”

Response: No change has been made to this comment. The comment does not provide sufficient specificity for the Department to make any modifications to the text. The comment discusses the Franchise Tax Board’s reporting requirements and proposes legislation to allow small business owners to appeal regulatory requirements on a case-by-case basis, topics which are unrelated to the scope of this rulemaking.

The Department determined that the proposed action affects small businesses. However, the Department also determined that the proposed regulation is the most effective and least burdensome way for current ammunition vendor license holders to provide required information to the Department. Vendors are already familiar with submitting the form BOF/CAV-0012 to the Department when applying to renew their ammunition vendor license.

LOCAL MANDATE DETERMINATION

The proposed regulation does not impose any mandate on local agencies or school districts.

ALTERNATIVES DETERMINATIONS

In accordance with Government Code section 11346.9, subdivision (a)(4), the Department has determined that no alternative it considered, or that it otherwise identified, or was brought to its attention, would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

The Department has determined that the proposed regulation is the most effective way for ammunition vendor license applicants and current ammunition vendor license holders to provide required information to the Department. Individuals are already familiar with submitting the form BOF 1021 and the form BOF/CAV-0012 to the Department when applying to become a licensed ammunition vendor in California or renewing their ammunition vendor license. Updating the forms to comply with statutory changes mandated by AB 28 is the least burdensome method to ensure ammunition vendor license applicants and those renewing their license provide all required information to the Department.

ALTERNATIVES THAT WOULD LESSEN ADVERSE ECONOMIC IMPACT ON SMALL BUSINESSES

The Department has determined that this proposed action affects small businesses. Requiring ammunition vendor license applicants and current ammunition vendor license holders to apply and renew their license via the prescribed forms is the easiest way to make sure that the vendor provides all required information. Ammunition vendors are already familiar with completing these forms.

DOCUMENTS INCORPORATED BY REFERENCE

1. Application for Ammunition Vendor License (Non-Firearms Dealer), form BOF 1021 (Rev. 03/2026)
2. Ammunition Vendor License Renewal Fee Transmittal, form BOF/CAV-0012 (Rev. 03/2026)

The above forms are incorporated by reference because it would be cumbersome, unduly expensive, or otherwise impractical to publish the forms in the California Code of Regulations. During the rulemaking proceeding, the forms were made available upon request, and were available for viewing on the Department's website.

NON-DUPLICATION

Some of the regulation repeats or rephrases in whole or in part a state or federal statute or regulation. This was necessary to satisfy the clarity standard set forth in Government Code section 11349.1, subdivision (a)(3).