

Nos. 25-238 & 25-566

In the
Supreme Court of the United States

CUTBERTO VIRAMONTES, et al.,
Petitioners,

v.

COOK COUNTY, et al.,
Respondents.

EDDIE GRANT, JR., et al.,
Petitioners,

v.

JAMES ROVELLA, IN HIS OFFICIAL CAPACITY, et al.,
Respondents.

*On Writs of Certiorari to the
United States Courts of Appeals
for the Seventh and Second Circuits*

**BRIEF OF CALIFORNIA GUN RIGHTS
FOUNDATION, DANIELLE JAYMES, AND USE
OF FORCE EXPERTS AS AMICI CURIAE
IN SUPPORT OF PETITIONERS**

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INTEREST OF *AMICI CURIAE*¹

California Gun Rights Foundation (“CGF”) is a non-profit organization that serves its members, supporters, and the public through educational, cultural, and judicial efforts to advance Second Amendment and related rights. CGF conducts research, promotes constitutionally-sound public policy, engages in litigation, educates the public about federal, state, and local laws, and performs other charitable programs. This Court’s resolution of challenges to “assault weapons” bans directly impacts CGF’s organizational interests and the rights of CGF’s members and supporters. Indeed, CGF has participated as a plaintiff in the successful challenge to California’s assault weapons ban in *Miller v. Bonta*, No. 3:19-cv-1537 (S.D. Cal.). After a trial involving testimony by multiple use-of-force experts, including General Youngman, the district court enjoined California’s ban, 542 F. Supp. 3d 1009 (S.D. Cal. 2021). After the injunction was vacated and the case remanded in the wake of *New York State Rifle & Pistol Ass’n v. Bruen*, 597 U.S. 1, 31 (2022), the district court entered a second injunction, 699 F. Supp. 3d 956 (S.D. Cal. 2023), which the Ninth Circuit stayed. 2023 WL 11229998 (Oct. 28, 2023). After the case was argued on appeal, the Ninth Circuit ordered that it be held in abeyance pending resolution of *Duncan v. Bonta*, No. 23-55805, involving the separate challenge to California’s ban on large-capacity

¹ No counsel for any party authored this brief in whole or in part, and no entity or person, aside from *amici curiae*, their members, and their counsel, made any monetary contribution toward its preparation or submission. *See* Sup. Ct. R. 37.6.

magazines. *See* 133 F.4th 852 (9th Cir. 2025), petition for certiorari filed No. 25-198.

Danielle Jaymes is a firearms instructor in San Diego, California. Ms. Jaymes has been certified by the California Department of Justice as an instructor for the California Firearms Safety Certificate, *see* Cal. Penal Code § 31635, and safe handling demonstrations. She has possessed multiple AR-15 platform firearms for home defense. She has an interest in the outcome of this case because, among other reasons, she wishes to continue possessing her AR-15. Ms. Jaymes is a member of CGF. She is currently a plaintiff in the challenge to California's handgun "roster" of approved semiautomatic handguns. *Renna v. Bonta*, No. 3:20-cv-2190 (S.D. Cal.).

Rick Vasquez is the former Acting Chief of the Bureau of Alcohol, Tobacco, Firearms and Explosives' Firearms Technology Branch (FTB). Before joining ATF, Vasquez served in the United States Marine Corps for 21 years; among other duties, he was a certified firearms shooting and identification instructor and a United States Marine Corps High Risk Personnel shooting instructor. Thereafter, from 1999 to 2014, he served as a Firearms Enforcement Officer in the FTB, where he instructed firearms on a global basis, wrote criminal reports on firearms, and provided firearms technology training. He was awarded ATF's Distinguished Service Medal. After leaving ATF and forming Rick Vasquez Firearms, LLC, he testified on firearms in state and local courts and provided instruction on the use of firearms. He has written numerous articles on firearms and suppressors. While employed by Diplomatic Security Service (DSS), he was instrumental in in-

roducing the M16 to DSS agents and preparing instructions on the M16. Vasquez has a strong interest in civilians continuing to have access to semiautomatic rifles like the AR-15. The Court cited Vasquez’s *amicus* brief in *Bondi v. VanDerStok*, 604 U.S. 458, 463 (2025).

Rob Chadwick is the Principal Training Advisor for the United States Concealed Carry Association (“USCCA”), where he oversees the implementation of the organization’s civilian self-defense training courses for over 8,000 certified instructors around the country. These courses include training in the use of AR-15s, and Chadwick led the development of the course. As an FBI Supervisory Special Agent, Chadwick led the Tactical Training Unit at the FBI Academy in Quantico for more than two years. Before that assignment, Chadwick served as a division Principal Firearms Instructor for 12 years. This training included instruction on the use of AR-15s. He received the FBI Director’s Medal of Excellence for Training. He has provided security for six U.S. Attorneys General. Chadwick has extensive first-hand knowledge of the efficacy of AR-15s, including the ease with which individuals can become proficient in their use. He has a strong interest in civilians continuing to have access to semiautomatic rifles like the AR-15.

Major General (Ret.) D. Allen Youngman served in the U.S. Army for more than 34 years in a variety of assignments, including Infantry, Special Forces, and Armor units. He retired from active duty with the rank of Major General in 2003. Prior to his retirement, he served as the fiftieth Adjutant General of the Commonwealth of Kentucky. Since 2004, Youngman has served as the Executive Director of the Defense Small Arms Advisory Council,

which represents the small arms and light weapons segment of the defense industry in domestic and international matters, providing technical advice on all aspects of the global firearms trade. He is a senior firearms instructor who has a strong interest in ensuring that civilians continue to have access to semiautomatic rifles like the AR-15.

SUMMARY OF ARGUMENT

In *District of Columbia v. Heller*, this Court catalogued some of the “many reasons” why Americans may choose to rely on a handgun for self-defense:

It is easier to store in a location that is readily accessible in an emergency; it cannot easily be re-directed or wrestled away by an attacker; it is easier to use for those without the upper-body strength to lift and aim a long gun; it can be pointed at a burglar with one hand while the other hand dials the police.

554 U.S. 570, 629 (2008).

Millions of Americans have selected the AR-15 platform rifle as their self-defense weapon of choice because it offers many of those same advantages—and more.² It is light and compact, which makes it easy to store for ready access, maneuverable within the tight confines of a home, and easy to operate for those with limited strength. Its

² This brief focuses specifically on AR-15 platform rifles for the convenience of the Court. The AR-platform is the paradigmatic example of the semiautomatic rifles that are subject to the bans at issue in this case, and ordinary Americans choose similar rifles for the same reasons.

pistol grip and shoulder-fired operation make it difficult for an attacker to wrest away.

AR-15s offer several additional advantages over common alternative firearms. In particular, it is easier to gain—and then maintain—proficiency with the AR-15 platform rifle than with a handgun. The AR-15’s straight-line design reduces recoil and makes the rifle easier to control and operate than other long guns. Lower recoil and better control mean better accuracy for most shooters, even very experienced ones. And the AR-15’s modularity allows owners to outfit their rifle to the task of home defense: a sling to free up a hand and facilitate movement; a mounted flashlight to spot and identify an intruder; optics to engage the target. These characteristics make AR-15 platform rifles especially advantageous for those who are smaller in stature, individuals who lack the strength to comfortably handle other long guns, and those who may not have the dexterity to effectively shoot a handgun.

Consider *amicus* Danielle Jaymes. Jaymes has a wrist injury that impacts her ability to comfortably handle a handgun. At Jaymes’ height—5’ 1”—other long guns are cumbersome and ill-fitted to her frame. An AR-15 rifle provides an ideal alternative for home defense: Outfitting the lightweight rifle with a sixteen-inch barrel, an adjustable stock, and an angled foregrip allows Jaymes to easily shoulder and stabilize the firearm so that she is prepared to defend herself and her home.

This brief details why semiautomatic rifles in general, and the AR-15 platform in particular, have become the class of arms chosen by millions of Americans for self-defense in the home.

ARGUMENT

I. The AR-15 Platform Rifle Is Controllable, Accurate, and Accessible for Defensive Use.

Modern semiautomatic rifles are owned by millions of Americans for lawful purposes. The AR-15 platform provides the paradigmatic variant of the semiautomatic rifle and has several features that make it “ideally suited for self-defense in the home.” *Barnett v. Raoul*, 756 F. Supp. 3d 564, 626 (S.D. Ill. 2024), *rev’d and remanded*, 180 F.4th 1035 (7th Cir. 2026).

The AR-15 is a descendant of the ArmaLite Corporation’s AR-10.³ Designed in 1955, the AR-10 marked an innovative leap over earlier generations of rifles. It featured aluminum and polymer parts, which made it significantly lighter than its wood-and-steel contemporaries. (An unloaded AR-10 weighed just over seven pounds; an Army-issued M1 Garand weighed nearly ten.) The AR-10 featured a barrel, locking assembly, and stock in a straight line, which significantly reduced recoil and improved controllability. ArmaLite incorporated those features into a scaled-down rifle the following year, which it designated the AR-15. In the face of financial distress, ArmaLite sold the AR-10 and AR-15 designs to Colt in 1959.

³ These details summarizing the AR-15’s history are drawn from Rose, *AMERICAN RIFLE* 364–69 (2008); Howlett & Manning, *SHOOTER’S BIBLE GUIDE TO AR-15S* 14–19 (2d ed. 2016); Declaration of D. Allen Youngman ¶¶ 6–12, *Miller v. Bonta*, S.D. Cal. No. 3:19-cv-1537 (Dec. 6, 2019), ECF No. 22-15; Declaration of Emanuel Kapelsohn ¶ 18, *Miller v. Bonta*, S.D. Cal. No. 3:19-cv-1537 (Dec. 6, 2019), ECF No. 22-12.

In 1964, Colt introduced a line of semiautomatic-only AR-15 rifles as the “Colt AR-15,” which it marketed to civilians and law enforcement. The only intellectual property respecting the AR-15 pattern of firearm is the term “AR-15” itself, which remains the property of Colt. The design itself is in the public domain. As a result, and due to the firearm’s generally favorable reputation, a host of manufacturers began producing the design under a litany of different names, often with the “-15” suffix.

Central to the AR-platform’s appeal and utility is its flexibility: AR-15 rifles have “highly standardized and interchangeable component parts” such that they can be easily modified “with few specialized tools.”⁴ This so-called “modularity” allows owners to customize their rifles to suit their needs.⁵ With those characteristics, it is no surprise that millions of civilians consider AR-15s the best alternative for their home defense.

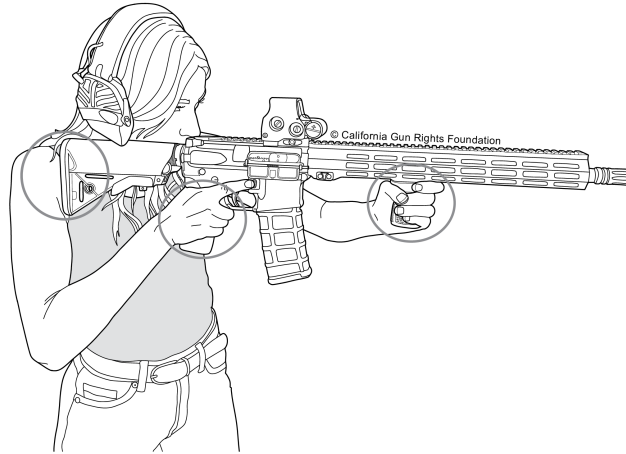
A. The AR-15’s Design Facilitates Accurate and Controlled Shooting.

AR-15 platform rifles combine several characteristics that make them straightforward for ordinary citizens to learn and operate effectively. Start with the rifle’s configuration, which provides multiple points of contact with the

⁴ Declaration of D. Allen Youngman ¶¶ 14–15, *Miller v. Bonta*, S.D. Cal. No. 3:19-cv-1537 (Dec. 6, 2019), ECF No. 22-15.

⁵ As one commentator put it when describing “The World’s Most Versatile Rifle”: “Unlike other long guns, the AR is infinitely customizable. There are accessories and gadgets that can be attached in all manner to the AR, something you will not find for any other firearm. Some have even termed the AR as the adult version of the Lego.” Mann, GUN DIGEST SHOOTER’S GUIDE TO THE AR-15 24 (2014).

shooter's body, making the AR-15 far easier to stabilize than alternative long guns and even handguns:



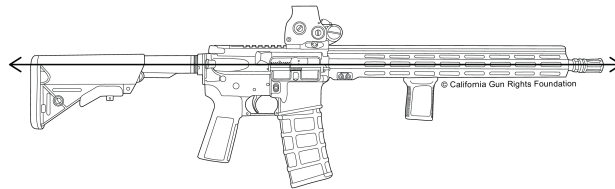
This increased stability naturally makes the AR-15 easier to aim (and shoot) accurately than the alternatives as well. Accuracy is the single most important attribute of a defensive firearm: the likelihood that the shooter will actually hit what they are aiming at, and thereby succeed in disabling an attacker while reducing the risk of injury to a bystander.

Several characteristics of AR-15 platform rifles make these advantages possible. They combine to make the AR-15 particularly well suited for the close confines of home defense:

Maneuverability. AR-15 platform rifles are relatively lightweight (approximately six-and-a-half pounds) compared to traditional hunting rifles and shotguns (which

commonly weigh upwards of eight pounds).⁶ They are also typically far more compact than traditional rifles or shotguns; a standard AR-15 configuration clocks in at an overall length of roughly 36 inches, while other long guns are well over 40 inches from butt to muzzle.⁷ These features make the AR-15 extremely maneuverable in the confined spaces of a home.

Straight-Line Design. The AR-15 platform's traditional straight-line layout—with the barrel, receiver, and stock aligned—reduces recoil and makes the rifle easier to aim and control. The in-line design gives the user the ability to fire relatively accurately by simply planting the rifle in the shoulder and pointing at the adversary.



⁶ For example, both the Remington Model 700 rifle and a standard 12-gauge Mossberg 500 weigh approximately 7.5 pounds. See Remington, *Model 700*, <https://www.remarms.com/rifles/bolt-action/model-700/>; Mossberg, *500 Hunting All Purpose Field*, <https://www.mossberg.com/500-hunting-all-purpose-field-50120.html>.

⁷ The Model 700 ranges from roughly 44" to 46.5"; the all-purpose Mossberg 500 models range from 43.75" to 47.5", depending on barrel length.

Pistol Grip. AR-15 platform rifles traditionally feature a pistol grip that positions the shooter's hand behind the trigger and trigger guard, which increases control and accuracy of fire from the shoulder. This feature grew out of the rifle's straight-line design, as it naturally positions the shooter's hand properly behind the trigger and trigger guard of the rifle.⁸ Moreover, the ergonomic placement of the controls provides easy operation and muscle memory development, so operation of the rifle becomes natural.

Compare the ergonomics of a traditional rifle stock with the AR-15's pistol grip:

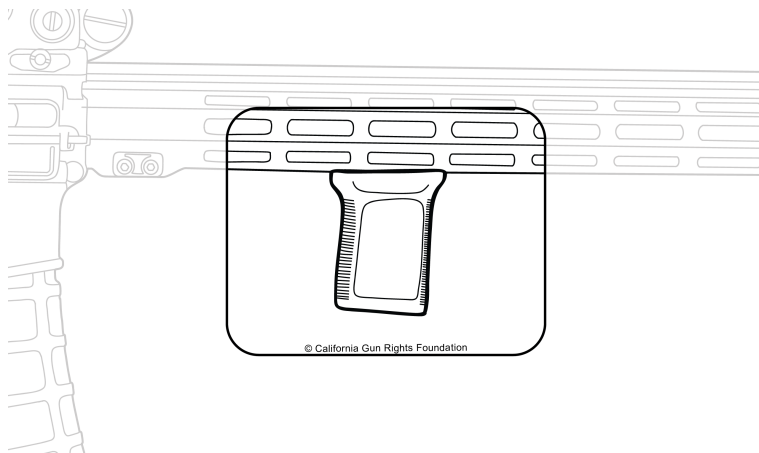


⁸ Because the AR-15's stock "comes straight back from the rifle's receiver to the user's shoulder" the pistol grip is necessary, "[o]therwise, the user would have to raise his or her dominant arm uncomfortably high [to] grip the rifle's buttstock, in a position where the dominant hand would interfere with aiming the rifle, and where the trigger and trigger guard ... are not located." Declaration of Emanuel Kapelsohn ¶ 28, *Miller v. Bonta*, S.D. Cal. No. 3:19-cv-1537 (Dec. 6, 2019), ECF No. 22-12.

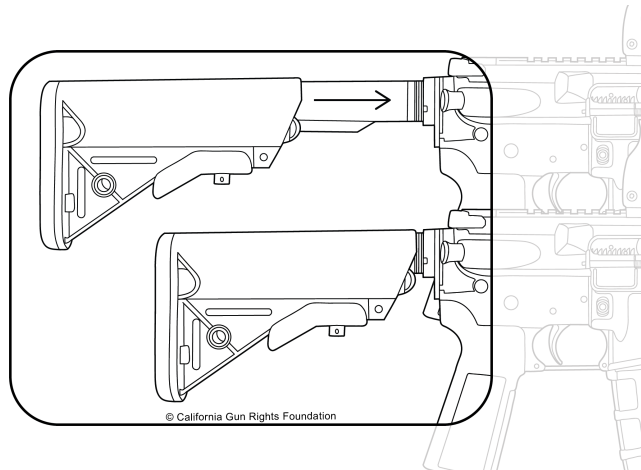


The pistol grip also facilitates safe operation by increasing control over the rifle, and it allows the shooter to easily access and operate the safety selector switch, bolt catch, and magazine release. And it provides a sturdy hold that decreases the likelihood that a defender is disarmed in an altercation.

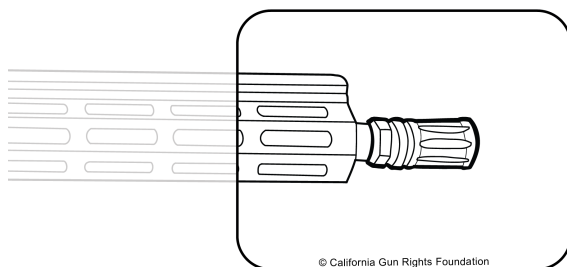
Forward Grip. AR-15 platform rifles can be outfitted with a forward grip, which allows a shooter to stabilize and control the firearm.



Adjustable Stock. Adjustable stocks allow shooters to adjust their rifle's length of pull—the distance from the trigger to the rear of the stock—to the right fit for comfortable, accurate firing. This allows a rifle to be adjusted to accommodate people of different sizes, so adjustable stocks are particularly useful for women and smaller shooters. They also allow for adjustments based on shooting position (*e.g.*, standing vs. kneeling vs. prone).



Flash Suppressor. AR-15 platform rifles can be fitted with a flash suppressor, which diverts muzzle flash away from the shooter's field of vision. This is particularly important in low-light situations (such as a middle-of-the-night defensive confrontation) where a blinding flash can have catastrophic consequences. *See Miller v. Bonta*, 542 F. Supp. 3d 1009, 1035–36 (S.D. Cal. 2021) (“A flash suppressor prevents the night-time home defender from being blinded by her own muzzle flash,” and “may also hide the home defender's location from attackers.”).



Modularity. Moving beyond these features, the AR-15 platform is a modular weapons system with standardized and interchangeable component parts. For example, with few notable exceptions, AR-15 rifles can interchange trigger mechanisms, bolt and locking components, barrels, magazines, buttstocks, optical sights, and other components. As a result, AR-15 platform rifles are highly customizable based on a shooter's needs, limitations, and preferences. A typical home-defense set-up might include

a sling (to free up a defender's hands and facilitate movement); a mounted flashlight (to help spot and identify an attacker); and optics (to accurately engage a target).

All of these characteristics work in combination to make the AR-15 and similar semiautomatic rifles far more accurate than other firearm alternatives for the ordinary user.

B. The Same Characteristics That Make AR-15s Accurate And Easy To Use Also Make Them Very Easy To Learn.

Amicus Chadwick can attest, from supervising the training of thousands of FBI trainees in Quantico, that proficiency with an AR-15 platform rifle is achieved far more quickly and far more reliably than proficiency with a handgun. The FBI's New Agent training program spans more than twenty-five weeks. Of the firearms instruction delivered in that program, the overwhelming majority of time is devoted to the handgun because it takes several weeks' training to bring a typical trainee to the Bureau's minimum standard of pistol proficiency. By contrast, the FBI devotes only a few days of the training cycle to rifle instruction.

Notwithstanding that disparity, most trainees pass the FBI's rifle qualification course without difficulty on their first attempt. The reverse is true of the handgun: it is not unusual for a trainee to require several additional weeks of remedial instruction devoted exclusively to handgun work to pass the qualification course. Remedial rifle training is, by comparison, a rarity.

That contrast is a function of the platform. The AR-15's multiple points of contact with the shooter's body, its in-line design, and its ergonomics do the work that, with a handgun, must be supplied by weeks of practice in grip, stance, trigger control, and fine motor skill.

This training experience isolates the single most important attribute of a defensive firearm: Accuracy. A platform that a minimally trained user can shoot accurately under stress is therefore safer—for the defender, for the defender's family, and for bystanders—than a platform that demands months of sustained practice to reach the same standard. If the FBI cannot bring a screened, motivated, full-time trainee to handgun proficiency in less than twenty-five weeks, it is unrealistic to expect an ordinary citizen, sporadically training on nights and weekends, to reach that standard with a handgun alone.

What *Amicus* Chadwick observed at Quantico is not an artifact of unique skills owing to law enforcement selection or law enforcement instruction. He has since observed the identical pattern among ordinary civilians. As Principal Training Advisor to the United States Concealed Carry Association ("USCCA")—the largest civilian personal-security training organization in the United States, with just over 850,000 active members and thousands of civilians trained each week in classes held in nearly every State—Chadwick oversaw the development and implementation of the organization's self-defense curriculum, including its AR-15 instruction, and he led a network of more than 8,000 certified instructors.

The results in that civilian setting mirror the results at the FBI Academy. The training concepts and principles

are virtually identical between civilian and law enforcement instruction; this holds true across marksmanship fundamentals, weapons handling, and platform manipulation. Students reach genuine proficiency with an AR-15 platform rifle (meaning they reliably hit what they are aiming at) in a fraction of the time it takes those same students to reach comparable proficiency with a handgun. In fact, most civilian students achieve consistent hits on target within their very first range session. That has proven true across the full range of students the USCCA serves: new shooters and experienced ones, young and elderly, large and small, and students with physical limitations that make a handgun difficult to operate. The pattern holds whether the student is a federal agent at Quantico or a first-time gun owner in a weekend class.

The AR-15 platform's ease of use and relatively short learning curve makes the rifle especially valuable in an actual defensive encounter. A defender confronting an imminent threat must operate a firearm quickly and accurately under extreme stress, which can impair fine motor control and impact the ability to manipulate a firearm. In a low-light home invasion where the intruder is close, the in-line design of the AR-platform rifle lets the defender fire accurately by simply planting the rifle in the shoulder and pointing at the adversary.

C. The AR-15's Characteristics Are Particularly Valuable to Women Defenders and Those with Limited Physical Strength or Ability.

The AR-15 platform's relatively light weight, low recoil, and modularity make it accessible to a broad range of users with versatile home-defense needs.

- Women.
- Elderly persons.
- Persons with disabilities or physical limitations.
- Smaller or less physically strong individuals.
- Persons who may lack the hand strength or dexterity necessary to operate other firearms as effectively.

Take a few examples. People of smaller stature might need an adjustable stock to comfortably hold a rifle. Those with strength or other physical limitations may seek a lightweight firearm with ergonomic grips that is easy to control. For law-abiding citizens of every gender, regardless of size, strength, or disability, the AR-15 offers options to suit their needs in a safe, customizable, and easy-to-use platform.

But the AR-15's benefits to these citizens do not stop there. As discussed above, the AR-15 platform's characteristics make it straightforward to operate and gain proficiency. So not only are they easier to shoot for those who might struggle with other firearms, but they are easier for them to shoot *well*. These advantages have particular importance in the self-defense context, where the defender may already face a substantial disparity in size, strength, numbers, or physical ability. Where a gun can be customized to fit an individual's physical needs and is easy to gain

proficiency with—as is the case with the AR-15 in particular—it becomes an effective equalizer for vulnerable citizens in self-defense situations.⁹

The arms bans at issue in this case deprive individuals of these benefits, leaving the most vulnerable among us without suitable means for defense.

D. The AR-15 Platform Offers a Combination of Defensive Characteristics That Common Alternatives Do Not.

There is no universally optimal or “perfect” self-defense firearm for every situation. The availability of handguns, shotguns, or other rifles does not eliminate the defensive utility of AR-15 platform rifles. To be sure, *Heller* makes clear that the government cannot justify a ban of some arms in common use by pointing to the availability of other arms. 554 U.S. at 629. Setting that aside, other self-defense options involve tradeoffs that can make them less suitable for a given defender, or in a particular situation.

⁹ As the district court explained in *Miller*:

Those of small stature or less strength may need an adjustable stock, pistol grip, or vertical foregrip to maintain proper control of their firearm. For those that have trouble handling the recoil of a pistol, [California’s assault weapons ban] forces a choice between: (1) using a firearm that is difficult to properly control; or (2) a different and potentially inferior firearm. Those with medical disabilities are left to operate firearms that lack characteristics that would make the firearm more comfortable or easier to operate.

542 F. Supp. 3d at 1037.

To recap this discussion, it is worth briefly comparing how the AR-15's combination of characteristics makes it the most effective choice for home defense.

Handguns. While handguns may be “the quintessential self-defense weapon,” *Heller*, 554 U.S. at 629, they are generally more difficult to aim, to shoot accurately, and to control than AR-15s. Those difficulties are of course exacerbated by inexperience and stress. Because a handgun has fewer points of contact with the shooter's body, the shooter must rely more heavily on grip strength, technique, and fine motor control. Compared to an AR-platform rifle, it takes more training to become proficient with a handgun, and that proficiency atrophies faster without consistent practice. Those disadvantages can be especially pronounced for elderly, disabled, physically weaker, or inexperienced users, who may struggle to rack a slide or to operate a small safety, magazine release, or decocking mechanism.

Shotguns. Shotguns can be effective defensive weapons, particularly at short distances, but they carry substantial disadvantages of their own. Shotguns are generally longer and heavier than an AR-15 platform rifle (which makes them cumbersome to manipulate in close quarters like the hallways of a home) and produce greater recoil (which impairs accuracy and slows follow-up shots). These issues often discourage the regular practice necessary to develop proficiency. The difficulties in wielding a shotgun are magnified for smaller, elderly, disabled, or inexperienced shooters. And while AR-platform rifles are designed to be readily adjusted and outfitted to a

shooter's needs, off-the-rack shotguns can be an uncomfortable fit for many.

Other Rifles. Other rifle designs may lack the AR-15's combination of light weight, low recoil, ergonomics, accuracy, reliability, and adaptability. Beyond that, most traditional hunting rifles are operated by bolt, pump, or lever, and require two hands to operate. Under the stress of confrontation, a manual action slows the defender's response and a defender fumbling with its operation may jam the rifle. And compared to the AR-platform, hunting rifles are commonly chambered for larger, more powerful cartridges that are more destructive and travel farther, making them less suitable for home defense.

* * *

The relevant question is not whether another firearm can be used for self-defense. Different platforms involve different combinations of recoil, weight, ergonomics, accuracy, ammunition characteristics, and other tradeoffs. The characteristics of AR-15 platform rifles provide genuine defensive advantages that reasonably cause ordinary citizens to select them for lawful self-defense.

II. Law Enforcement, Which Shares Civilians' Interest In Accuracy And Ease Of Use, Has Made Similar Determinations About The AR-15's Superiority As A Defensive Weapon.

State and federal law enforcement are required to choose weapons for use in close quarters, no different than civilians. Every day, officers are called to address dangerous situations in homes, apartments, and businesses. Law enforcement has the exact same interest—if

not a heightened interest—in promoting safety and accuracy in those spaces.

Each of the most prevalent alternatives to AR-15s that law enforcement may choose (handguns, shotguns, and rifles) is indisputably protected under the Second Amendment for use by civilians. Law enforcement increasingly chooses AR-15s, however, due to their accuracy and ease of use for all the same reasons described above. While not relevant to the Second Amendment analysis,¹⁰ as a basic principle there is no proper reason to exclude civilians from this same choice: As shown above, there is no specialized training needed to learn how to proficiently use AR-15 platform rifles. Nor are they more dangerous than the alternatives; to the contrary, they are *safer* because they are easier to use and thus more accurate.

In any event, the judgment that the AR-15 platform is the more effective and more accurate defensive tool is embedded in federal law enforcement doctrine. *Amicus* Chadwick can attest from first-hand, professional experience that standard FBI operational planning calls for the

¹⁰ Courts have improperly used the distinction between civilians and law enforcement or the military in a number of ways in Second Amendment analyses. The Fifth Circuit has excluded firearms held by police and military from the “common use” inquiry. *United States v. Wilson*, 164 F.4th 380, 385 (5th Cir. 2026). Others characterize weapons—such as the AR-15—as “military” weapons in order to remove them from the scope of the Second Amendment entirely. *See, e.g., Bianchi v. Brown*, 111 F.4th 438, 456 (4th Cir. 2024) (en banc); *Bevis v. City of Naperville, Ill.*, 85 F.4th 1175, 1193 (7th Cir. 2023); *see also* McWilliam, *Arms*, 101 TUL. L. REV. (forthcoming 2027) (manuscript at 11–12), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=6505699 (collecting cases).

presence of an issued long gun—typically an AR-15 platform carbine—whenever feasible. When a law enforcement officer has the luxury of advance notice and can choose his or her weapon, the officer chooses the rifle (almost always an AR-15). The sidearm is the fallback for when the rifle is impractical to carry.

Law enforcement agencies have institutionalized that preference at considerable expense, and for good reason: When an officer must stop a lethal threat quickly, a patrol rifle is markedly more likely to place accurate, effective fire on that threat than a handgun is. The ordinary citizen defending a home confronts the same problem the officer confronts—an imminent lethal threat that must be stopped immediately—but with less training, less notice, and no backup. It would be a strange rule that permits professionals to select the AR-15 platform precisely because it is the most accurate and most effective defensive option available, while denying that same option to the citizen who has the greater need for it.

CONCLUSION

For the reasons above and those stated in the Petitioners' briefs, the Court should reverse.

Respectfully submitted,

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