

Brady Campaign
& Brady Center

To Prevent Gun Violence

August 8, 2008

Division of Policy and Directives Management
U.S. Fish and Wildlife Services
4401 N. Fairfax Drive, Suite 222
Arlington, VA 22203
Attn: 1024-AD70

Re: Supplemental Comments Opposing Proposed Rule to Allow the Carrying of Loaded, Hidden Firearms in National Park Areas and National Wildlife Refuges

To Whom It May Concern:

The Brady Center to Prevent Gun Violence and Brady Campaign to Prevent Gun Violence, with its network of Million Mom March Chapters, are the nation's largest, non-partisan, grassroots organizations dedicated to creating an America free from gun violence.

On June 30, 2008, we submitted comments opposing the proposed rule to remove longstanding restrictions on the carrying of loaded, concealed firearms in National Park Areas and National Wildlife Refuges.¹ Our comments described how national park and refuge visitors armed with loaded, hidden semiautomatic weapons and other firearms would endanger park and refuge visitors and lead to an increased risk of gun crime and shooting injuries and death.

The initial comment period for this proposal was extended in light of the U.S. Supreme Court ruling in *District of Columbia v. Heller*, 128 S.Ct. 2783 (June 26, 2008). **The *Heller* ruling strongly supports maintaining current restrictions on the carrying of concealed, loaded firearms in national parks and refuges.** We are submitting the following supplemental comments concerning the *Heller* ruling's acknowledgment of the presumptive constitutionality of concealed carry prohibitions and responding to faulty gun lobby arguments submitted in the initial comment period.

¹ Our initial comments are online at <http://www.bradycampaign.org/xshare/pdf/fedleg/national-park-comments.pdf>.

The U.S. Supreme Court Ruling in *District of Columbia v. Heller* Supports Restrictions On Concealed Carrying of Loaded Firearms

In *District of Columbia v. Heller*, the U.S. Supreme Court ruled that the Second Amendment gives individuals a right to possess handguns in the home for self-defense. The Court, however, stressed that this right “is not unlimited.”² Indeed, although the Court split 5-4 on whether the Second Amendment provides a constitutional right to possess firearms for private purposes or only for militia purposes, all nine justices agreed that a wide variety of laws regulating guns in public are constitutional.

Justice Scalia, writing for the *Heller* majority, described numerous common sense restrictions on guns that are “presumptively lawful.”³ He listed several examples of these **lawful restrictions, including bans on the carrying of concealed weapons, which had been upheld by courts since the 1800s:**

From Blackstone through the 19th-century cases, commentators and courts routinely explained that the right was not a right to keep and carry any weapon whatsoever in any manner whatsoever and for whatever purpose. ... For example, the majority of the 19th-century courts to consider the question held that prohibitions on carrying concealed weapons were lawful under the Second Amendment or state analogues.⁴

Moreover, as far back as 1897, the Supreme Court recognized the validity of prohibiting the carrying of concealed weapons, stating in *Robertson v. Baldwin*, 165 U.S. 275 (1897), in no uncertain terms that:

the right of the people to keep and bear arms (article 2) is not infringed by laws prohibiting the carrying of concealed weapons.⁵

Justice Scalia concluded his opinion in *Heller* by reiterating that a ban on concealed weapons is one of the constitutionally permissible “tools for combating” what he recognized as “the problem of handgun violence in this country....”⁶ The four dissenting justices in *Heller* also agreed with Justice Scalia’s majority opinion that bans on the carrying of concealed weapons in public do not violate the Second Amendment.⁷

² *Heller*, 128 S.Ct. at 2816.

³ *Id.* at 2817 n.26.

⁴ *Id.* at 2816, citing *State v. Chandler*, 5 La. Ann. 489, 489-490 (1850) (upholding a state law banning concealed carrying of weapons that “became absolutely necessary to counteract a vicious state of society, growing out of the habit of carrying concealed weapons, and to prevent bloodshed and assassinations committed upon unsuspecting persons”); *Nunn v. State*, 1 Ga. 243, 251 (1846) (upholding state ban on concealed carrying of weapons).

⁵ *Robertson*, 165 U.S. at 281-82 (citing bans on the carrying concealed weapons as one of several “well-recognized exceptions” to the Bill of Rights).

⁶ *Heller* at 2822.

⁷ *Id.* at 2851 (recognizing that Justice Scalia’s opinion “appropriately” approves of a broad set of gun laws including “prohibitions on concealed weapons”) (Justice Breyer, dissenting, joined by Justices Stevens, Souter, and Ginsburg).

Our previous comments described in detail how laws allowing the carrying of concealed weapons would threaten park and refuge visitors. States implementing concealed carry licensing systems have endangered the public by repeatedly providing licenses to dangerous people who have committed violent crimes. As a matter of policy, there is no justification for opening our parks and refuges to the dangers of armed visitors.

Following the unanimous agreement by all nine justices in *District of Columbia v. Heller* that bans on the carrying of concealed weapons are entirely consistent with the Second Amendment, there is also no legal justification for repealing the longstanding restrictions on concealed carrying of firearms in parks and refuges. The Department of the Interior should follow the Supreme Court's guidance on the lawfulness of bans on concealed firearms and abandon the proposed regulations that would endanger visitors to our national parks and wildlife refuges.

The Department Should Not Give Any Credence to NRA Claims That Concealed Carrying Reduces Crime, As These Claims Are Based on Faulty Data and Discredited Studies

The National Rifle Association, in comments submitted on June 30, 2008, relied on a handful of discredited studies to claim that allowing armed park and refuge visitors “is likely to reduce violent crime.”⁸ In fact, the evidence to the contrary is overwhelming – laws that allow the carrying of loaded, concealed weapons do not reduce crime and, if anything, lead to an increase in violent crime.⁹ This is not merely a disagreement among experts. The few studies cited by the NRA are countered by the overwhelming weight of scientific authority showing that greater availability of firearms leads to more gun injuries and deaths.¹⁰

⁸ Chris W. Cox, Executive Director NRA-ILA, Public Comments on Proposed Rule, June 30, 2008, at 2 (public submission reference number FWS-R9-NSR-2008-0062-23579.1).

⁹ See, e.g., Robert Martin Jr., & Richard Legault, *Systematic Measurement Error with State-Level Crime Data: Evidence From the "More Guns, Less Crime" Debate*, J. RESEARCH IN CRIME & DELINQUENCY, (2005); Tomislav Kovandzic, et. al., *The Impact of "Shall-Issue" Concealed Handgun Laws on Violent Crime Rates*, HOMICIDE STUDIES, (2005); John Donohue, *Guns, Crime, and the Impact of State Right-To-Carry Laws*, 73 FORDHAM L. REV. 623, (2004); John J. Donohue, *The Impact of Concealed-Carry Laws*, in EVALUATING GUN POL'Y: EFFECTS ON CRIME AND VIOLENCE 289, 320 (2003); Paul H. Rubin & Hashem Deshbakhsh, *The Effect of Concealed Handgun Laws on Crime: Beyond the Dummy Variables*, 23 INT'L REV. L. & ECON. 199 (2003); Kovandzic Tomislav V. & Thomas B. Marvell, *Right-to-Carry Concealed Handguns and Violent Crime: Crime Control Through Decontrol?*, 2 CRIMINOLOGY & PUB. POL'Y. 363 (2003); Ian Ayres & John J. Donohue, *The Latest Misfires in Support of the 'More Guns, Less Crime,' Hypothesis*, 55 STAN. L. REV 1371 (2003); Ian Ayres & John J. Donohue, *Shooting Down the "More Guns, Less Crime" Hypothesis*, 55 STAN. L. REV 1193 (2003); Ian Ayres & John J. Donohue, *Nondiscretionary Concealed Weapons Laws: A Case Study of Statistics, Standards of Proof, and Public Policy*, 1 AM. L. & ECON. ASS'N., 436 (1999); Jens Ludwig, *Concealed-Gun-Carrying Laws and Violent Crime: Evidence from State Panel Data*, 18 INT'L REV. L. & ECON 239 (1998); DA Black & DS Nagin, *Do Right-To-Carry Laws Deter Violent Crime?*, 27 J. LEGAL STUD. 209 (1998); David McDowall, et. al., *Easing Concealed Firearms Laws: Effects on Homicide in Three States*, 86 J. CRIM. L. & CRIMINOLOGY 193 (1995).

¹⁰ See, e.g., Matthew Miller, David Hemenway, Deborah Azrael, *State-level homicide victimization rates in the US in relation to survey measures of household firearm ownership, 2001-2003*, SOCIAL SCIENCE & MEDICINE (2006) (“States with higher rates of firearm ownership had significantly higher homicide victimization rates”); Lisa M. Hepburn, David Hemenway, *Firearm availability and homicide: A review of the literature*, 9 AGGRESSION & VIOLENT BEHAVIOR 417 (2004) (“households with firearms are at higher risk for homicide, and there is no net beneficial effect of firearm ownership”); Matthew Miller, et al., *Rates of Household Firearm Ownership and*

The NRA primarily relies on a 1995 study by Gary Kleck claiming that there are “as many as 2.5 million defensive gun uses per year.”¹¹ This study has been widely discredited due to survey flaws resulting in “massive overestimation.”¹² Indeed, the claim of 2.5 million defensive gun uses per year is extrapolated from just 66 people who reported such gun use, or only 1.3% of those surveyed, multiplied by 200 million adults.¹³ Multiplying such a small positive response by 200 million yields a monumental magnification of false positives. A leading researcher illustrated Kleck’s faulty methodology by applying the same methodology to an ABC News/Washington Post poll with a similar low rate of positive responses, which would likewise yield a massive overestimation:

One question asked: “Have you yourself ever seen anything that you believe was a spacecraft from another planet?” Ten percent of respondents answered in the affirmative. Those 150 individuals were then asked, “Have you personally ever been in contact with aliens from another planet or not?” and 6% answered “Yes.”

By extrapolating to the national population, we might conclude that almost 20 million Americans have seen spacecraft from another planet, and over a million have been in personal contact with aliens from other planets.¹⁴

Contrasted with this faulty research, the data shows a vastly smaller number of defensive firearm uses to kill an attacker – only 195 justifiable gun homicides out of more than 12,000 gun homicides nationwide in 2006.¹⁵ All told, guns are used “far more often to kill and wound innocent victims than to kill and wound criminals ... [and] guns are also used far more often to intimidate and threaten than they are used to thwart

Homicide Across US Regions and States, 1988–1997, 92 AM J. PUBLIC HEALTH 1988 (Dec 2002) (“in areas where household firearm ownership rates were higher, a disproportionately large number of people died from homicide); Mark Duggan, *More Guns, More Crime*, 109 J. POL’Y. ECON. 1086 (2001); Matthew Miller, et al., *Firearm availability and unintentional firearm deaths*, 33 ACCIDENT ANALYSIS & PREVENTION 477 (Jul. 2000) (“A statistically significant and robust association exists between gun availability and unintentional firearm deaths.”).

¹¹ NRA comments at 3. Kleck references this same study in his 2001 book cited by the NRA.

¹² David Hemenway, *Survey Research and Self-Defense Gun Use: An Explanation of Extreme Overestimates*, 87 J. CRIM. L. & CRIMINOLOGY 1430, 1444 (Summer 1997). See also David McDowall, Colin Loftin, Stanley Presser, *Measuring Civilian Defensive Firearm Use: A Methodological Experiment*, 16 J. QUANTITATIVE CRIMINOLOGY, at 16 (2000) (“Our results imply that Kleck and Gertz’s assumption is false.”); David Hemenway, Deborah Azrael, *Are guns used more by US civilians for self-defense or for intimidation*, 6 INJURY PREVENTION 263 (2000) (“Guns are used to threaten and intimidate far more often than they are used in self-defense.”); Philip J. Cook, Jens Ludwig, *Defensive Gun Uses: New Evidence From a National Survey*, 14 J. QUANTITATIVE CRIMINOLOGY 111, 128 (1998) (defensive gun uses (DGU) estimates “appear to suffer from a large positive bias and greatly overstate the prevalence of DGU”); David Hemenway, *The Myth of Millions of Annual Self-Defense Gun Uses: A Case Study of Surveys Overestimates of Rare Events*, 10 CHANCE 6 (1997) (“All attempts at external validation of the 2.5 million figure show that it is an enormous overestimate”); Philip J. Cook, Jens Ludwig, David Hemenway, *The Gun Debate’s New Mythical Number: How Many Defensive Uses Per Year?*, 16 J. POLICY ANALYSIS & MGMT. 463 (1997).

¹³ Hemenway, *Survey Research and Self-Defense Gun Use*, at 1433.

¹⁴ *Id.* at 1437-38.

¹⁵ Federal Bureau of Investigation, *Justifiable Homicide by a Private Citizen by Weapon* (Table 14) (Sept. 2007), available at http://www.fbi.gov/ucr/cius2006/offenses/expanded_information/data/shrtable_14.html.

crimes.”¹⁶ The Department should not rely on the discredited study cited by the NRA to allow armed persons to place park and refuge visitors at a heightened risk of violence.

The NRA also relies on statements by Gary Kleck for the assertion that “people who use guns in self-defense are significantly less likely to be injured during a robbery or assault than are victims who respond in any other way.”¹⁷ Studies have shown this to be false – using a gun to attempt to resist a robbery may not help prevent injuries, and in fact increases the likelihood that a robbery will escalate into a murder. After analyzing the data, one researcher concluded “that it is a particularly dangerous and foolhardy act to forcefully resist a robber with a gun.”¹⁸ Another similarly concluded, “A far higher percentage of robbery killings than of robberies involve active victim resistance. . . . One thing is clear: if life is dear, resistance to robbery with lethal weapons rarely makes sense.”¹⁹ Moreover, there were only 61 robberies out of 272 million park visits in 2006.²⁰ Given the low rate of violent crime in our parks and the serious threat posed by armed visitors, the risk of harm is too great to allow concealed carrying in the parks and refuges.

In addition, the NRA incorrectly asserts that concealed carry laws have led to decreases in violent crime and that states that allow unrestricted concealed carrying (“shall issue” states) have “lower violent crime rates, on average, compared to the rest of the country.” Both claims are false. In fact, most states appear to “experience increases in violent crime, murder, and robbery when shall-issue laws are adopted.”²¹ In addition, the fourteen states that prohibit concealed carrying or give police the discretion to deny concealed carry licenses have a lower violent crime rate, on average, than states that either allow concealed carrying without a license or that require law enforcement to issue licenses to anyone without a criminal record.²²

¹⁶ David Hemenway & Deborah Azrael, *The Relative Frequency of Offensive and Defensive Gun Uses: Results From a National Survey*, 15 VIOLENCE & VICTIMS 257, 271 (2000).

¹⁷ NRA comments at 3.

¹⁸ Philip J. Cook, *The Relationship Between Victim Resistance and Injury in Noncommercial Robbery*, J. LEGAL STUD. 405-16 (1986).

¹⁹ Franklin E. Zimring & James Zuehl, *Victim Injury and Death in Urban Robbery: A Chicago Study*, 15 J. LEGAL STUD. 1, 31 (1986).

²⁰ *Crime in National Parks*, THE WASHINGTON POST, Feb. 28, 2008, available at <http://www.washingtonpost.com/wp-dyn/content/graphic/2008/02/28/GR2008022800363.html> (2006 is the last year with data). Likewise, there were 261 aggravated assaults in the parks in 2006, less than one per million visitors.

²¹ John J. Donohue, *The Impact of Concealed-Carry Laws*, in EVALUATING GUN POL’Y: EFFECTS ON CRIME AND VIOLENCE 289, 320 (2003). As we previously commented, “shall-issue laws have resulted, if anything, in an increase in adult homicide rates.” Jens Ludwig, *Concealed-Gun-Carrying Laws and Violent Crime: Evidence from State Panel Data*, 18 INT’L REV. L. & ECON. 239 (1998) (emphasis in original). Likewise, “firearms homicides increased in the aftermath of the shall issue laws,” such that shall issue laws may “raise levels of firearms murders” and thus may “increase the frequency of homicide.” David McDowall, et. al., *Easing Concealed Firearms Laws: Effects on Homicide in Three States*, 86 J. CRIM. L. & CRIMINOLOGY 193, 202-203 (1995). Similarly, “[f]or robbery, many states experience increases in crime” after concealed carry laws are enacted. Hashem Dezhbakhsh & Paul Rubin, *Lives Saved or Lives Lost? The Effects of Concealed-Handgun Laws on Crime*, THE ECON. OF GUN CONTROL 473 (May 1998). Several different statistical approaches to the question “indicate a rather substantial increase in robbery,” while “policies to discourage firearms in public may help prevent violence.” John Donohue, *Guns, Crime, and the Impact of State Right-To-Carry Laws*, 73 FORDHAM L. REV. 623 (2004).

²² Calculations by Brady Center to Prevent Gun Violence, based on FBI Uniform Crime Reports data for 2006 available via the Bureau of Justice Statistics Data Online System: <http://www.ojp.usdoj.gov/bjs>.

The NRA also cites data from Florida and Texas to support its false claim that concealed carry laws lead to reductions in violent crime. Since allowing the concealed carrying of firearms in 1987, Florida annually has ranked as the state with the highest violent crime rate more often than any other state.²³ Texas similarly has ranked among the top 15 states with the highest violent crime rate for most of the last two decades.²⁴ In just the last week, a Florida concealed carry license holder shot and killed a U.S. border protection agent, and numerous other license holders have committed violent crimes.²⁵ Indeed, Florida also has been woefully inadequate in its revocation of licenses from lawbreaking concealed carry license holders. As we mentioned in our initial comments, during the first half of 2006, the state failed to suspend or revoke licenses of 216 people with active warrants, 128 people with domestic violence restraining orders, nine people charged with felonies or violent reckless misdemeanors, six registered sex offenders, and at least one prison inmate. Another 1,400 people who had pled guilty or no-contest to felony charges also had concealed carry licenses in Florida.²⁶ If these are the best examples the NRA can muster, it is clear that the Department should give no credence to the NRA's arguments.

In conclusion, the evidence is overwhelming that allowing concealed carrying of loaded firearms in our nation's parks and refuges will expose visitors to an increased risk of injury or death. The *Heller* opinion makes clear that prohibitions on concealed carrying have long been recognized as not violating the Second Amendment. Restrictions on concealed carrying remain, as Justice Scalia stated in *Heller*, one of the constitutionally permissible "tools for combating" the serious "problem of handgun violence in this country...." The Department should reject the gun lobby's flawed arguments and maintain the regulations promulgated under President Reagan that have kept our parks and refuges some of the safest areas to visit in the country.

Sincerely,

A handwritten signature in black ink that reads "Paul Helmke". The signature is written in a cursive, slightly slanted style.

Paul Helmke, President,
Brady Center to Prevent Gun Violence and
Brady Campaign to Prevent Gun Violence

²³ FBI, Uniform Crime Reports, state rankings 1987-2006. Texas ranked among the top 15 states with the highest violent crime rate 17 out of the 20 last years according to this latest data. *Id.*

²⁴ *Id.*

²⁵ Brian Haas, Macollvie Jean-François and Andrew Tran, *Road Rage Led To Border Protection Agent's Killing, Police Say*, SOUTH FLORIDA SUN-SENTINEL, Aug. 8, 2008. Appendix A supplements our listing in our initial comments of crimes and misdeeds committed by concealed carry licensees.

²⁶ Megan O'Matz & John Maines, *License to Carry: Investigation Reveals Criminal Pasts of Those Toting Guns*, SOUTH FLORIDA SUN-SENTINEL, Jan. 28, 2007, at A1.

APPENDIX A - SUPPLEMENTAL CRIMES AND MISDEEDS BY CONCEALED CARRY LICENSEES

In our initial comments we listed numerous instances of crimes and misdeeds committed by concealed carry license holders. In the few weeks since we submitted our initial comments, concealed carry licensees committed additional violent crimes and misdeeds, **including the shooting deaths of two law enforcement officers**. The gun lobby's claim that only "law-abiding citizens" receive concealed carrying licenses and that concealed carrying of loaded firearms will make our communities safer is patently false.

The following incidents update Appendix A of our previously filed comments. These crimes and misdeeds by concealed carry licensees occurred between late May and early August 2008. The incidents chronicle shootings obtained from newspaper articles, public records requests, and detailed reports, involving people who were *legally* licensed to carry concealed weapons. It is important to note that these likely represent *only a fraction* of the recent dangerous and deadly incidents involving licensees. Often, a suspect's status as a licensee is not reported by law enforcement or the media, nor is that information easily available to the public.

Pembroke Pines, FL • August 5, 2008. James Patrick Wonder, 65, was charged with first-degree murder in the shooting of Donald Pettit, a federal agent with U.S. Customs and Border Protection.²⁷ The incident apparently stemmed from a road rage incident that resulted in both men pulling into a post office parking lot. There, Wonder, a concealed carry licensee, shot Pettit in the head in front of Pettit's twelve-year-old daughter. Wonder was arrested the next day.²⁸

St. Louis Park, MN • July 24, 2008. Michael C. Iheme, 50, was charged with first-degree murder in the death of his wife, Anthonia E. Iheme, 28, who was shot in a parking lot as she was leaving work. Anthonia had an active restraining order against her husband and there was an alleged history of domestic abuse. After shooting his wife, Michael called 911 and said, "I have killed the woman that mess my life up..."²⁹

Murray, UT • July 23, 2008. Vitaly Kovtun, 22, was charged with aggravated assault, a third-degree felony, after pointing his gun at a group of teenagers. The teenagers had pulled up next to Kovtun at a stop light and imitated a Grey Poupon commercial by saying to Kovtun: "Pardon me, do you have any Grey Poupon?" Instead of replying "but of course," Kovtun pulled a gun on them.³⁰

Winston-Salem, NC • July 17, 2008. John Gallaher III, a concealed carry licensee and owner of three handguns, committed double homicide when he killed his best friend, Sean Gallagher, 23,

²⁷ Brian Haas, Andrew Tran, et. al., *Neighbors Surprised by Arrest of Miramar Suspect in Agent's Killing*, SOUTH FLORIDA SUN-SENTINEL, Aug. 7, 2008.

²⁸ Jennifer Mooney Piedra, Ani Martinez, et. al., *Driver Arrested in Fatal Shooting of Federal Agent*, MIAMI HERALD, Aug. 6, 2008.

²⁹ Jim Adams, *911 Call: 'I Have Killed the Woman That Mess Up My Life'*, STAR TRIBUNE, July 26, 2008.

³⁰ *Motorist Draws Gun at 'Grey Poupon' Question*, July 23, 2008, KSL.com (last viewed Aug. 8, 2008).

and an acquaintance, Lori Fioravanti, 24. He shot both victims in the head. Police are working on a timeline for the killings and a motive. It is known that Gallaher and Gallagher had been friends since middle school and that Gallagher worked with Fioravanti.³¹

Southlake, TX • July 14, 2008. Russ Martin was charged with aggravated assault-bodily injury with a deadly weapon following an argument with his fiancée. During the argument he beat her and brandished a handgun. The argument started because Martin was upset that his fiancée did not make a phone call that Martin asked her to make.³²

Twinsburg, OH • July 13, 2008. Ashford Thompson, 23, who faces the death penalty if convicted of killing Twinsburg police officer Joshua Miktarian, was indicted on charges of aggravated murder, escape, resisting arrest, tampering with evidence, and carrying a concealed weapon. He is accused of killing Miktarian during a traffic stop; he shot the officer four times in the head. Thompson had a concealed carry permit but is charged with carrying a concealed weapon because it is illegal to hold or use a weapon while stopped for a law enforcement reason.³³

College Hill, OH • June 23, 2008. Thomas Howell, 71, was convicted of aggravated menacing for pointing a gun at another driver, April Evans, who cut him off in a June 23, 2008 road rage incident. After Evans cut Howell off, Howell pulled up alongside her car and threatened to shoot her. The cars chased each other and Howell continuously pointed the gun at Evans until Howell arrived at the church where he is a preacher and Evans went to a local store to call 911.³⁴

Jeffersonville, IN • June 17, 2008. Yalanda Parrish, 39, was indicted on two felonies for shooting a fellow motorist, Wesley Mosier Jr., 52. Following a road rage incident, Parrish shot Mosier in the chest.³⁵

Georgetown, OH • May 23, 2008. J.R. Lawrence pled guilty to operating a vehicle impaired and to improper handling of a firearm following a drunk driving incident. Lawrence's blood alcohol content was twice the legal limit and he was carrying a concealed firearm at the time he was stopped by police.³⁶

³¹ Dan Galindo, *Reason for Shooting Deaths Still Unclear: John Gallaher III is Charged with Killing Best Friend and a Woman he Scarcely Knew*, WINSTON-SALEM JOURNAL, July 17, 2008.

³² Domingo Ramirez Jr., *Radio Host Still Off the Air After Being Charged with Assault*, STAR TELEGRAM, Aug. 7, 2008.

³³ Karen Farkas, *Ashford Thompson Indicted in Killing of Twinsburg Officer Joshua Miktarian*, THE PLAIN DEALER, July 22, 2008.

³⁴ Kimberly Perry, *Road Ragin' Preacher Convicted*, CINCINNATI ENQUIRER, Aug. 4, 2008.

³⁵ Matt Thacker, *Parrish' Gun Permit to be Suspended*, NEW ALBANY TRIBUNE, July 24, 2008

³⁶ Barbara Goldman, *Aberdeen Council Member Sentenced for Impaired Driving Incident*, THE LEDGER INDEPENDENT, July 22, 2008.