

Mailing Address: P.O. Box 17087 Denver, CO 80217-0087

The Department has received the following comments via the Firearms Dealer Department Rulemaking email. The Department will respond to certain parties' comments should the Department implement their recommendations into the rule. Some comments submitted were not directed at the proposed rules, but rather to the legislation (HB24-1353). These comments are not able to be considered as the General Assembly passed this bill and it is the duty of the Firearms Dealer Department to implement the new law as written.

Eugene Baker Colorado School of Trades

> RE: Rule 2-300 Received on April 1, 2025

I would like to express concern regarding the timeline given under Rule 2-300 A (1.c). From the emails received from the FDD it is my understanding that CBI will not accept fingerprints for employees until July 1, 2025 and we must submit employee fingerprints no later than July 8, 2025. During this week long time frame there is a federal holiday that lands on Friday, July 4, 2025 so it is my assumption that both Identogo and Colorado Fingerprinting will observe this holiday creating a burden and bottleneck in this process. I would ask the FDD to extend the time given these circumstances to at minimum Friday, July 11, 2025.

Response from the Division sent on April 2, 2025

Thank you for your comments. The Division is aware of the short timeline contained in this legislation and is committed to working with industry members who make a good-faith effort to meet those requirements. The statute requiring fingerprinting is not effective until July 1, 2025, and CBI cannot begin accepting fingerprints until that date. FDD is waiting on CBI to provide the codes that IdentoGo and Colorado Fingerprinting need. We anticipate receiving the codes in the very near future and will broadcast an industry update as soon as we receive them.

Nathan Dechairo Daily Pawn

RE: Comments for rulemaking

Received on April 1, 2025

I would like to express my concerns regarding the tight timeline businesses now face. The rules were originally expected to be finalized by February 1st. With a May 2nd deadline to submit applications, businesses have very little time to ensure compliance while continuing operations.

Software integration for this requirement with such short notice will be difficult.

Furthermore, many of the new requirements closely mirror existing ATF compliance measures but differ just enough to increase the regulatory burden on businesses. This redundancy creates unnecessary complexity rather than streamlining compliance efforts.



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I urge you to consider these challenges and work toward a solution that provides businesses with the necessary time and resources to comply effectively.

I want to take a moment to thank the Firearms Dealer Division (FDD) for its professionalism and dedication throughout the rulemaking process. Your commitment to ensuring a clear regulatory framework is greatly appreciated.

Response from the Division sent on April 2, 2025

Thank you for your comments. The Division is aware of the short timeline contained in this legislation and is committed to working with industry members who make a good-faith effort to meet those requirements. The statute requiring fingerprinting is not effective until July 1, 2025, and CBI cannot begin accepting fingerprints until that date. FDD is waiting on CBI to provide the codes that IdentoGo and Colorado Fingerprinting need. We anticipate receiving the codes in the very near future and will broadcast an industry update as soon as we receive them.

Ron Troyer

RE: Proposed new FFL regs

Received on April 2, 2025

It's clear that the purpose of these regulations are NOT to make the people of this state safer, but just to harass the dealers. If the state legislature was really concerned about the safety of it's citizens, it would reverse the state's "Sanctuary City" status rather than hampering the peoples' right to protect themselves.

Response from the Division sent on April 3, 2025

Thank you for your comments.

Richard Beck *Pawnee Sportsmens Center LLC*

RE: Firearms Dealer Division *Received on April 2, 2025*

The proposed Firearms Division rules are both unwanted, unneeded, onerous and not effective at controlling firearms crime. They are designed to impede lawful firearms owners of their rights under the 2nd Amendment to the Constitution of the United States to keep and bear arms. They require time and expense of lawful firearms owners which will do absolutely nothing to thwart acts by criminals to commit crime, and are not only a burden to gun owners directly, but cost the State of Colorado in time and money to implement.



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The whole idea of the Special Business Group – Firearms Dealer Division is promoted by a liberal view that ordinary lawful citizens do not have a right to keep and bear arms. Their goal is to make firearms/accessories as difficult and costly as possible to acquire and possess, and ultimately to remove firearms from the lawful citizenry. Rather than honor the 2nd Amendment, they are circumventing it by unconstitutional means.

Finally, these rules and regulations are, at best, a redundancy to Federal law in the forms put forth by the Bureau of Alcohol, Tobacco, Firearms and Explosives.

Response from the Division sent on April 3, 2025

Thank you for your comments.

Sabio Concialdi

RE: Proposed ruling by the State of Colorado

Received on April 3, 2025

For Gods sake why is the state wanting to increase tariffs and taxes on all Firearms and ammunition. Is this going to saves lives? I know every Democrat politicians want to purge all guns from the general populace which is a direct violation of our Constitution.

Our forefathers knew how rotten the people of power can get so they created the second Amendment and others to protect us from this evil. The state as well as the city are always wanting more money because their alway broke. The more they get the more they want but where the money goes is your guess as well as mine. So our state fathers want to put added tariffs of 6.5 % on all gun sales and ammunition plus sales tax which is 7.7% which comes to 14,2% which would discourage a potential buyer who wants self protection for himself and family. Another bold and hideous tariff of \$400 annually on gun dealers to discourage them from starting a business or staying in business. We in Colorado need to drain our own Swamp. There are people in this world by the millions who love guns and that will never change.

Response from the Division sent on April 3, 2025

Thank you for contacting the Firearms Dealer Department. Written comments are always accepted and reviewed, and we appreciate all feedback from our industry partners.

Denise Landin EZPAWN

> RE: Public Comment to Proposed Rules Received on April 3, 2025

Attached please find EZPAWN's public comment on the proposed rules supplementing its testimony at the hearing on April 1, 2025.



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EZPAWN Testimony Proposed Rules 4.1.25

Response from the Division sent on April 4, 2025

Thank you for your rulemaking comments. The Division appreciates your input in the rulemaking process.

Regarding Proposed Rule 2-300 (fingerprinting), the Division is committed to working with the industry on this issue and will be as flexible as possible on fingerprint submissions. FDD has requested the fingerprinting codes from CBI and anticipates receiving them in the very near future. CBI is aware of the dates and has escalated the process. Furthermore, IdentoGo and Colorado Fingerprinting will not schedule appointments without the codes. IdentoGo has told us the earliest they will schedule appointments is mid-May and Colorado Fingerprinting will not schedule appointments until June.

Please go ahead and submit the applications and employment eligibility forms without the fingerprints. On the latter form, check the fingerprint question "NO." After July 1, 2025, the fingerprinting receipts can be emailed to our licensing team to update your employees' files. The email address is: dor_fddlicensing@state.co.us

With reference to Proposed Rule 3-110, there is a prohibition on FDD having access to the 4473 and A&D book; therefore duplicate records are necessary. The State forms for the firearms transactions and the acquisitions will be available on the FDD website in the near future. The records can be maintained manually or electronically. You have until July 1, 2025, to implement the recordkeeping requirements.