

Specialized Business Group— Firearms Dealer Division

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Please see below for a clarification with respect to Bulletin 25-01 regarding the deadline for applying for and obtaining a State Firearms Dealer Permit. Please direct all inquiries to the Firearms Dealer Division within the Colorado Department of Revenue.

BULLETIN 25-01-C

June 11, 2025

FIREARMS DEALER DIVISION BULLETIN 25-01-CLARIFICATION

Notice to All Firearms Dealers— This Bulletin serves as a clarification to previous Bulletin 25-01, issued on May 23, 2025. The purpose of Bulletin 25-01 was to inform all federal firearms license ("FFL") holders that wished to continue to engage in the business of selling firearms in the state of Colorado without a pause in their operations after July 1, 2025, of the requirement to submit all application materials by May 2, 2025.

The permit application deadline for current FFL holders to continue to engage in the business of dealing firearms without a pause in operations following the effective date of House Bill 24-1353 has now passed. See 18-12-401.5 (4)(II)(A) C.R.S.

Current FFL holders may continue to engage in the business of dealing firearms until June 30, 2025, with only their FFL.

Further, current FFL holders may apply for a State Firearms Dealer Permit ("State Permit") at any time, but may not engage in the business of dealing firearms in Colorado after July 1, 2025, without having obtained both a FFL and State Permit.

If a current FFL falls within any of the categories of FFLs specified in the "application requirement" section below and continues to engage in the business of dealing firearms in Colorado after July 1, 2025, without having received a State Permit, that FFL is in violation of state statute. An FFL holder that has not obtained a State Permit after July 1, 2025, may be subject to administrative and criminal penalties if it continues to engage in the business of dealing firearms.

Colorado statute allows the Division up to 60 days to act upon an application for a State Permit. Therefore, if a current FFL holder applies for a State Permit on or after July 1, 2025, it may not engage in the business of dealing firearms after July 1, until such time as the Division reviews the application and issues the State Permit. The Division will work as quickly as possible to review all applications and ensure that FFL holders can operate compliantly with state law.

Please review the following information carefully:

Application Requirement: In accordance with C.R.S. section 18-12-401.5(4)(c)(II)(A), all current holders of a Type 01 and/or Type 02 FFLs, and any current holders of a Type 07 and/or Type 08 FFLs who sell firearms to the public at retail, must have submitted an application to the Firearms Dealer Division ("Division") for a State Firearms Dealer Permit on or before May 2, 2025, in order to continue to engage in the business of dealing firearms in the state of Colorado without a pause in operations **after July 1, 2025**. (See C.R.S. section 18-12-401(1) defining "dealer" and Rule 1-110(A), 1 C.C.R. 214-1, concerning applicability to these FFL types.) If you submitted an application on or before May 2, 2025, but have not received your State issued permit you may continue to engage in the business of dealing firearms **after July 1, 2025**, while the Division processes your application.

Permit Requirement: In accordance with C.R.S. section 18-12-401.5(1)(a), beginning July 1, 2025, all new and existing FFL holders that fall within the categories specified above must hold a valid state permit to engage in the business of dealing in firearms in Colorado.

Unclassified Felony: Pursuant to C.R.S. section 18-12-401.5(1)(c)(I), beginning July 1, 2025, engaging in the business of dealing in firearms without a State Permit is an unclassified felony punishable by a fine of up to \$250,000. As of May 2, 2025, all current FFL holders who fall within the categories specified above must have submitted an application for a State Firearms Dealer Permit in order to continue dealing firearms after July 1, 2025, without a pause in operations in Colorado or be subject to these penalties. If you have not yet applied for a State Permit, you may continue to engage in the business of dealing firearms until June 30, 2025. However, unless you submitted an application on or before May 2, you must cease dealing in firearms beginning July 1, 2025, until such time as the Division has acted upon your application and issued your State Permit.

For further information and application details, please visit https://sbg.colorado.gov/firearms-dealer-division or email the Division at documents-dealer-division or email the documents-documents-dealer-division or email the documents-docume

Issued by the Firearms Dealer Division