

Letter of Explanation

Date: 1 July, 2020

To: Mary Losty & Patricia Escher, A.I.C.P., Division Manager

From: Michael D. Wood

Re: Class 7 FFL @ 302 Belvedere Avenue

Hi, this letter is in response to numerous conversations I've had with the Division Manager regarding the establishment of a Class 7 FFL on my property located at 302 Belvedere Avenue here in Cambridge. I've lived in the residence since 1995 and would like to continue to live and work in Cambridge.

I think a little background might be helpful as you discuss this situation. I'm an avid hunter, outdoorsman, and gun collector—I have been for years and it's one of the reasons I located here and one of the reasons I stay here. I'm also a Designated Firearms Collector which was granted to me by the Maryland State Police. I served in the military for 24 years and was involved in 3 conflicts. I currently have a Wear and Carry Permit issued by the Maryland State Police as well.

I've been putting together and building firearms at my home for almost 25 years. My neighbors have never complained nor do most of them even know. I'm not trying to draw any attention to myself or my hobby. A few years ago I decided I was going to build some guns to sell. Over several years I accumulated over \$100,000 in parts as part of that process. I guess I should have researched much further, but I didn't. Why? I can put together and own as many firearms as I like for my own personal use, however, in order to put them together for the purpose of selling them I must have a Class 7 FFL which by ATF definition is this: Manufacturer of Firearms other than destructive devices. For those who only want to sell firearms you need a Class 01 FFL. There are thousands of FFL's operated from their homes across the State of Maryland and the entire United States. I don't have the exact numbers, but you can get all the stats on the ATF website. One day I would eventually like to open a full service gun business and possibly an indoor range (that would be on commercial property) or a small gun shop in one of the properties downtown. I've contacted both the ATF at the Federal level and the Maryland State Police at the State level. They really don't care where you have your FFL as long as you have the zoning for it. Specifically, I was able to contact the ATF and they approved this language as adequate to substantiate that zoning requirements are met for a Class 7 FFL:

Office and the repair, assembly, and maintenance of firearms

I have the emails from both the ATF and the Maryland State Police regarding having an FFL in Maryland. Although the ATF looks at zoning, the Maryland State Police do not. I have the emails on file should you need them.

One of the things I'm really interested in is Laser Engraving which I would also like to do. I won't be doing anything different from what I'm doing now. I don't make any noise. I sit at a bench in my garage or inside the home quietly putting guns together and taking them apart. Laser Engraving makes no noise. My hope is that one day I will be able to grow the business beyond my home to somewhere in Dorchester County. LWRC and Caesar Guerini both operate within the Cambridge City Limits if I'm not mistaken, and I'm sure that both are probably at least Class 7 FFL's. Caesar Guerini is located within what looks like a residential neighborhood and I've never heard of any issues. If they can operate a much larger commercial operation, it would make sense to me that I could continue to do what I'm already doing—except that I could sell the products I make and support my family and community. I won't be manufacturing in the sense that LWRC operates. They build guns from blocks of materials. They operate at the industrial level. I will never be able to do that from my home nor do I plan to try. I work in a space that's less than **336 square feet** and there's never been a complaint in the last 25 years.

Please advise and thank-you for your consideration
Respectfully,

Michael D. Wood

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