

No. 1-00-3541

**IN THE APPELLATE COURT OF ILLINOIS
FIRST JUDICIAL DISTRICT**

CITY OF CHICAGO and COUNTY OF COOK,)
)
) Plaintiffs-Appellants,)
)
 v.) Appeal from the Circuit Court of
) Cook County, County Department
) Chancery Division
 BERETTA U.S.A. CORP., et al.) No. 98 CH 15596
) The Hon. Stephen A. Schiller,
) Judge Presiding
 Defendants-Appellees.)

**BRIEF AMICUS CURIAE OF AMERICAN JEWISH CONGRESS,
CENTRO COMMUNITARIO JUAN DIEGO, CHICAGO PROJECT FOR
VIOLENCE PREVENTION, CHICAGO SINAI CONGREGATION,
HANDGUN CONTROL, INC., ILLINOIS COUNCIL AGAINST HANDGUN
VIOLENCE, ILLINOIS LAWYERS OF THE LEGAL COMMUNITY AGAINST
VIOLENCE, ILLINOIS PEACE ACTION, INTERFAITH INITIATIVE AGAINST GUN
VIOLENCE, MILLION MOM MARCH, NATIONAL ASSOCIATION OF SOCIAL
WORKERS, ONTARGET COALITION, PASTOR ROBERT MCLAUGHLIN, REACH
OUT AND TOUCH, INC., ST. JAMES EPISCOPAL CATHEDRAL, UHLICH
CHILDREN'S HOME, VOICES FOR ILLINOIS CHILDREN**

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I. INTRODUCTION

A. INTEREST OF AMICI CURIAE

Amici Curiae are civic groups, individuals, community organizations, religious and non-profit corporations whose members, as people of the State of Illinois, Cook County, all share a direct and personal stake in the controversy before this Court. Specifically, Amici Curiae are members of the public who seek to redress the degrading and traumatic effects of gun violence on their lives, including by preserving their common law right to invoke the public nuisance doctrine.

B. IDENTITY OF AMICI CURIAE

American Jewish Congress is an organization of American Jews founded in 1918 to protect the civil, political and religious rights of American Jews and all Americans. It has supported strong gun control laws. It has a particular interest in this subject because one of its leaders, Jack Berman, was one of the victims of the gun rampage in the San Francisco law firm of Pettit and Martin.

Centro Comunitario Juan Diego was founded in Chicago in January 1994 by a group of women who were members of a Christian based community. The organization promotes self-development and leadership training with a special emphasis on health related issues.

Chicago Project for Violence Prevention was formed in 1995 as a strategic public health initiative to support accelerated community-based and citywide violence prevention. The Chicago Project partners with community-based organizations that take the lead in developing comprehensive strategic plans to reduce violence. The mission of the Chicago Project is to work with its community, city, and county partners in order to reduce violence in all forms.

Chicago Sinai Congregation is a reform Jewish congregation in the heart of Chicago, with 750 member families. Under the leadership of Senior Rabbi Michael Sternfield, Chicago Sinai has been a strong advocate of common sense gun reforms.

Handgun Control, Inc. (“HCI”), a non-profit, membership organization with over 400,000 members from throughout the country, advocates the enactment of sensible gun control laws at the federal, state and local level. HCI supports efforts to ensure that the gun industry acts responsibly and that municipalities have a role in abating public nuisances created by the irresponsible distribution practices of the gun industry. With over 10,000 members in Illinois, HCI has a vested interest in protecting Illinois citizens against the ravages of gun violence.

Illinois Council Against Handgun Violence (“ICHV”) is the largest, oldest, and most active state-based gun violence prevention organization in the country. ICHV is dedicated to educating the public about the epidemic of gun violence and reducing gun injuries and deaths caused by the easy accessibility of firearms in Illinois.

Illinois Lawyers of the Legal Community Against Violence is comprised of attorneys and law firms throughout Cook County, dedicated to reducing gun violence through legal education, legislation, and litigation, and is part of a nationwide network of legal professionals sharing this goal, organized under the auspices of Legal Community Against Violence, a non-profit corporation originally founded by survivors of the 1993 assault weapon massacre in the San Francisco law offices of Pettit & Martin.

Illinois Peace Action (IPA) is the state’s largest peace and disarmament organization. IPA is an education and action organization of citizens committed to the abolition of nuclear weapons and to a long-range vision of lasting world peace. IPA educates citizens on military and foreign policy issues and advocates for social change. IPA empowers citizens through

leadership development and organizing for effective action, and builds coalitions with other organizations, religious bodies, and political leaders to reach its goals.

Interfaith Initiative Against Gun Violence is dedicated to bringing the moral authority of the clergy and lay congregants to bear on the pervasive plague of gun violence in our society. Sponsoring institutions include: Chicago Sinai Congregation, Fourth Presbyterian Church, Chicago Temple (First United Methodist Church of Chicago), Holy Name Cathedral and Annunciation Greek Orthodox Cathedral.

Million Mom March is a grass-roots advocacy organization dedicated to preventing gun death and injury and supporting victims and survivors of gun trauma. The Million Mom March has a regional office in Chicago, and chapters and members in Chicago and throughout Illinois.

National Association of Social Workers (NASW) is a professional membership organization comprised of more than 155,000 social workers with chapters in every state, including the Illinois Chapter with 7500 members, the District of Columbia and internationally. Since its inception in 1955, the NASW has had as its purposes to develop and disseminate high standards of practice while strengthening and unifying the social work profession as a whole and improving the quality of life through the utilization of social work skills. NASW has initiated campaigns and published materials to educate the public about the impact of violence on children and other vulnerable populations. Social workers experience violence directly in their work and through their clients. The harmful effects of handgun violence are an everyday reality to social workers throughout the country. For these reasons, NASW supports efforts to enforce public nuisance laws against gun manufacturers whose products are irresponsibly sold and distributed in Illinois.

OnTarget Coalition is comprised of hundreds of organizations involved in health care, law enforcement, religious and civil service, business, education, victim and child advocacy, and domestic violence prevention. The Coalition was launched in 1994 by ICHV to organize people affected by gun violence and to educate them about policy solutions that address the root causes of gun violence.

Father Robert McLaughlin is a pastor at Holy Name Cathedral, a Roman Catholic Congregation in the City of Chicago.

Reach Out and Touch, Inc. was established in 1990 and is a not-for-profit, social service organization in Chicago born out of the desperate needs of a neglected community. Its mission to rebuild and nurture family structure was determined by the condition of those whose lives are being destroyed by the negative forces that exist in the environment.

St. James Episcopal Cathedral is located in Chicago, and with 468 member families, St. James Episcopal Cathedral is at the forefront of interfaith and ecumenical efforts to stem violence in the City of Chicago. St. James is the “mother church” of the Episcopal Diocese of Chicago and is the seat of the bishop of the Diocese of Chicago, Right Rev. William D. Persell.

Uhlich Children’s Home was founded in 1869, helping Chicago’s children and families break cycles of violence and abuse. Uhlich’s Community Programs are diverse programs that develop and coordinate resources within communities to help more than 600 children and families succeed through Professional Foster Parenting, Independent Living, Vocational Training, Family Centered Services, Hands Without Guns – Chicago, HomeWorks and Teen Parenting Service Network.

Voices for Illinois Children is a statewide, non partisan, non-profit group of child advocates who work with families, communities and policy makers to ensure that all children grow up healthy, nurtured, safe and well educated.

II. SUMMARY OF THE ARGUMENT

The trial court's judgment improperly denies Amici Curiae, and indeed all the people of this community, a doctrine long established in common law and recognized by the Illinois courts as the appropriate remedy to address precisely the type of grievous injury that is inflicted on the general public by gun violence. As shown more fully below, the trial court's judgment should be reversed.

The trial court was bound by law to accept as true the allegations of the City of Chicago's and Cook County's Second Amended Complaint (the "Complaint"),¹ including the gravamen of the Complaint, that is, that defendant gun manufacturers, distributors, and dealers, conduct their business in a manner ensuring the steady and widespread availability of handguns to persons prohibited by law from possessing them, such as convicted felons, juveniles, and residents of the City of Chicago. In sum, the Complaint sets forth that defendant manufacturers produce handguns in much greater numbers than the legitimate market demand. They take advantage of and feed the illegal secondary market in firearms that is fueled by rogue distributors, dealers and gun traffickers, whose ultimate patrons are those who use these lethal tools to inflict gun injuries and deaths. Despite the trial court's acceptance of the truth of these facts, it entered a judgment depriving the people of the City of Chicago and Cook County of their common law right to hold accountable those engaging in the injurious business practices alleged, and decreed instead that

¹ Citations to the Complaint appear herein as "A.C. ¶ ____".

the people themselves shall bear all the costs and suffering of gun violence. This judgment is untenable.

III. ARGUMENT

A. THE ALLEGATIONS OF THE SECOND AMENDED COMPLAINT STATE A CAUSE OF ACTION FOR A PUBLIC NUISANCE

Public nuisance is a broad, flexible concept designed to redress “unreasonable interference with a right common to the general public.” -RESTATEMENT (SECOND OF TORTS), § 821B (1965); *City of Chicago v. Commonwealth Edison Co.*, 24 Ill. App. 3d 624, 321 N.E.2d 412, 418 (1st Dist. 1974). Typically, the plaintiff must allege (1) the existence of a public right; (2) a violation of that right by the defendant; and (3) resulting injury. *Feder v. Perry Coal Co.*, 279 Ill. App. 314, 318 (4th Dist. 1935). All three are alleged in the Complaint, as set forth more fully below.

Since the late nineteenth century, the courts have recognized that there is a public right to be free from disturbance and “unreasonable apprehension of danger to person and property.” *Village of Des Plaines v. Poyer*, 123 Ill. 348, 14 N.E. 677, 678 (1888). According to Prosser, conduct which “injuriously affects the safety, health or morals of the public or works some substantial annoyance, inconvenience or injury to the public” is redressable as a public nuisance. WILLIAM H. PROSSER, TORTS, § 88 at 583 n. 29 (4th ed. 1971). To determine whether conduct results in an actionable public nuisance, the courts must consider, among other factors, “[w]hether the conduct involves a significant interference with the public health, the public safety, the public peace, the public comfort or the public convenience.” RESTATEMENT (SECOND) OF TORTS § 821B(2) (1965).

It is undeniable that the proliferation and illegal use of handguns in Chicago undermines, disrupts and destroys the health and safety of the community. The Complaint alleges that the

defendant manufacturers contribute to this harm by designing and marketing firearms to appeal to the criminal market, firearms that are regularly possessed and used illegally in Chicago. A.C. ¶ 33, 49-50. Firearms distributed by the defendant distributors are also regularly possessed and used illegally in Chicago. A.C. ¶ 34. The defendant manufacturers and distributors know that there is a market for illegal firearms in Chicago, and they know that they can profit by actively endeavoring to supply firearms for illegal use in the Chicago market. A.C. ¶¶ 36-41. The defendant manufacturers and distributors knowingly oversupply or “saturate the market” in areas where gun control laws are less restrictive, including suburban areas around Chicago, knowing that persons will illegally bring firearms they purchase there into more restrictive jurisdictions such as Chicago. A.C. ¶ 35.

Further, the defendant manufacturers’ distribution practices and marketing strategies exploit the fact that existing government regulation of dealers is relatively minimal. The facts alleged in the Complaint show that defendant manufacturers engage in practices which encourage rather than discourage rogue distributors and dealers who sell firearms to persons whom they know or should know intend to use and possess them illegally. A.C. ¶¶ 42-45. In fact, much like a polluter dumping contaminants into a community’s water supply, the defendants offload the societal costs of their product onto the community, exploiting the illegal secondary market in firearms that generates much of those costs. Gun manufacturers are not required by law to supervise their distributors and dealers. It is evident they could do so but choose not to supervise them. The manufacturers of guns traced to crime have access to the information they need to determine who the rogue dealers are: Almost every time a crime gun is traced, ATF notifies the manufacturer, identified by the serial number on the gun. At that point,

the manufacturer is put on notice that the specific gun has been used in a crime and must report to ATF the distributor to whom the gun was first sold by the manufacturer.

Indeed, a recent Federal Bureau of Alcohol, Tobacco and Firearms (“ATF”) study reveals that just 1.2% of all federally licensed firearms dealers account for over 57% of guns successfully traced to crime. Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms: “Youth Crime Gun Interdiction Initiative & Crime Gun Trace Reports” (1999) (hereafter “ATF Crime Gun Trace Reports 1999”). The same study demonstrates that almost a quarter of all guns used in crime and traced were originally part of multiple purchases. *Id.* Additional tracing data reveals that less than 10% of the dealers whose guns were traced to Chicago crimes are responsible for 48% of the crime guns traced to a dealer. A.C. ¶ 41.

Because manufacturers are not now required by law to bear any costs associated with the misuse of their product, there is no market incentive for the manufacturers or their distributors to take action to discourage and eliminate the practices of rogue dealers. Indeed, just the opposite is true – as long as a dealer provides a “profitable” outlet for sales, that dealer adds to the bottom line. As alleged by the City of Chicago and Cook County in the trial court “[t]he defendant firearms manufacturers and distributors choose not to supervise, regulate or standardize the distributors and dealers because such a practice would limit sales of their products to a significant illegal market and thereby reduce their sales.” A.C. ¶ 46.

There are two ways a defendant can be found to have interfered with a public right: (1) the defendant can engage in conduct that is both intentional and unreasonable; or (2) the defendant can engage in conduct that is actionable under the ordinary principles of negligence. *Bubalo v. Navegar, Inc.*, 1998 U.S. Dist. LEXIS 3598 *7-*8 (N.D. Ill. Mar. 16, 1998) (citing the RESTATEMENT and Illinois authorities). “Interference with a public right is intentional if the

actor acts for the purpose of causing it, or knows that it is resulting or is substantially certain to result from his conduct.” RESTATEMENT (SECOND) OF TORTS § 825 (1965); *see also Patterson v. Peabody Coal Co.*, 3 Ill. App. 2d 311, 122 N.E.2d 48, 51 (4th Dist. 1954). As shown above, the facts alleged in the Complaint demonstrate defendants have interfered with the public rights of Amici and all the people of Cook County intentionally. Moreover, even though the manufacture and marketing of handguns is not in and of itself harmful, the irresponsible manner in which defendants engage in their business substantially contributes to the ultimate use of handguns in acts of violence against our community. *See, e.g.*, RESTATEMENT (SECOND) OF TORTS § 834, comment f, setting forth that a defendant can be held liable for a public nuisance when he is a substantial participant in creating a condition which “is not of itself harmful, but becomes so upon the intervention of some other force, the act of another person or force of nature.”

In the trial court, the City of Chicago’s and Cook County’s allegations, if proved, demonstrate that the defendant manufacturers, distributors and dealers are substantial participants in the creation and perpetuation of a public nuisance – widespread marketing and distribution practices that cause the underground market in illegal firearms to flourish – making handguns readily accessible to persons using them in acts of violence against our community. A prima facie case of public nuisance has been pleaded.

B. THE PUBLIC NUISANCE ALLEGED POSES AN IMMEDIATE, ONGOING AND DEVASTATING THREAT TO OUR COMMUNITY FOR WHICH EXISTING LAW PROVIDES NO APPROPRIATE REMEDY EXCEPT ABATEMENT

Although unlawful to possess for most ordinary citizens in the City of Chicago, handguns are a fact of life and death in this City, and throughout Cook County. In a City where handgun possession is by and large illegal, and in a county and state where the concealed carrying of a

handgun is strictly regulated, somehow, someday, 17,000 firearms annually make their way into the evidence room of the Chicago Police Department. Thousands of the guns recovered are manufactured by the defendant manufacturers named in this lawsuit. Every year in Cook County, dozens of men, women and children are killed and injured as a result of the criminal misuse of handguns by persons prohibited from possessing them - convicted felons, juveniles, Chicago residents. Families and whole communities are traumatized by gun injuries and deaths, and by the fear of gun violence.

In 1997, the last year for which comprehensive data is available, 1,290 citizens of Illinois were killed by gun violence. Of those victims, 254 were youths. Lost lives, the trauma and costs of gun shot wounds, the lost productivity of gunshot victims, are only a small part of the total cost of gun violence in Cook County. Between 1994 and 1998, the Cook County Bureau of Health expended in excess of \$50,000,000 simply to provide medical treatment for gunshot victims. A.C. Prayer for Relief at ¶ 2.a. Indeed, according to a recent study by two economists, gun violence costs Americans at least \$100 billion a year, and most of the cost is due to the emotional damages, fear and general reduction in the quality of life suffered by everyone in this country, including those who are not the immediate victims of gun violence. P. Cook and J. Ludwig, "Gun Violence: The Real Costs," Oxford Univ. Press (2000).

In 1994, more than 190 million firearms were already in the homes and streets of this country. P. Cook and J. Ludwig, "Guns in America: Results of a Comprehensive National Survey on Firearm Ownership," Police Foundation (1996). Roughly one third of these firearms were handguns. *Id.* A recent United States Justice Department survey found that only about one in every six Americans owns a handgun, and that the proportion of households owning firearms

is declining markedly, even as the number of guns increases. T. Diaz, "Making a Killing in the Business of Guns in America," New York Press (1999) at p. 11.

Between 1994 and the end of 1997, despite the decline in the number of households owning firearms, and despite the approximately 65 million handguns already in circulation, this country's domestic gun manufacturers produced a total of approximately 7,196,000 additional handguns. Violence Policy Center, "Firearms Production in America: 1999 Edition," Appendix Four, p. 181. This oversaturation and defendants' marketing of handguns to the criminal market are demonstrably interrelated. Indeed, as shown in Exhibit "A," as gun manufacturers have focused their production more and more on high caliber, semiautomatic pistols, the homicide rate has followed the manufacture rate of semiautomatic pistols. G J Wintemute, "Guns and Gun Violence," in Blumenstein A, Wallman J, eds. The Crime Drop in America. New York: Cambridge University Press, 2000; pp. 45-96; See Appendix, Exhibit A hereto.

As set forth in the Complaint, this correlation between the homicide rate and how defendants design and market their guns is anything but accidental. Instead it is the direct, foreseeable result of defendants' irresponsible business practices which are calculated to create, promote and sustain the highly profitable, illegal secondary market in handguns. In Cook County, these practices include:

"[D]efendants knowingly design, manufacture, market, supply and distribute thousands of firearms in order to facilitate their entry into and possession in Chicago, where they are illegal to possess, and where they are often used in the commission of crimes, including crimes in which residents of Chicago are killed, maimed or terrorized. Defendants know and foresee that their conduct contributes to crime in Chicago and Cook County, and creates an unreasonable threat to public health and safety. The defendants' conduct undermines the City's efforts to protect the public health, safety and welfare through stringent gun control ordinances which make it illegal to possess most types of firearms in Chicago. The defendants are aware that, despite these stringent restrictions, there

is a profitable market for illegal firearms in Chicago. For their own financial benefit, and through their design and marketing efforts, they spur demand for illegal weapons in Chicago; they then distribute massive quantities of these weapons in a manner that makes them readily available for use in the City, in violation of law.”

A.C. ¶ 1.

The people of this City and Cook County share the right to be free from unreasonable danger and apprehension of danger, to enjoy their public streets and places without fear. Indeed, in this City where the local legislative body has declared handgun possession to be unlawful except in rare instances, and in this state where the Constitution guarantees every citizen a healthful environment, the people of this community have a right and an expectation that they will enjoy their public streets and places without fear of gun violence.

The rate of gun violence in this community and the rate of unlawful handgun possession demonstrate that this public right has been violated, and that the quality of life has been degraded by the reality and the specter of gun violence. While the community suffers from the ready availability of handguns to prohibited persons, the defendants prosper by it, and engage deliberately in business practices that will enable them to continue to prosper by it. In short, the widespread availability of handguns to unauthorized persons unlawfully interferes with the life of this community because it results in violence, injury, death, fear and suffering. Defendants engage in conduct that fosters that public nuisance, so that they themselves may profit. Under the doctrine of public nuisance, they should be held accountable.

In the trial court, the City of Chicago and Cook County alleged facts demonstrating that a small core group of manufacturers, distributors and dealers are responsible for the vast majority of crime guns used in the City of Chicago. A.C. at ¶¶ 41-46. In addition, the practices engaged in by these dealers - such as multiple sales – result in quantifiably more damage to the

community, because the median “time to crime” of guns sold by these defendants is almost twice as short as the crime guns used in Chicago and sold by other members of the gun industry. A.C., ¶¶ 34-46.

At present, neither Illinois nor federal law regulates the number of firearms which may be purchased at one time by one buyer. A licensed dealer is required to notify ATF of sales of more than two firearms to the same buyer in a two-day period, but such sales are legal. Yet multiple sales of handguns accounted for 22% of all handguns first sold at retail in 1999 and traced to crimes in 1999. ATF Crime Gun Trace Reports 1999, General Findings, at p. 18. When multiple firearms are purchased for gun trafficking, by the time ATF becomes aware of the multiple purchase, the damage is already done because the firearms have moved into the secondary criminal market. See, e.g. ATF Crime Gun Trace Reports 1999, General Findings, Chapter 3.

As shown by the allegations of the Complaint, with the exception of the common law public nuisance doctrine, existing law is not properly tailored to redress the ongoing and deadly harm inflicted on this community by these defendants. Unless and until preventative regulatory solutions are adopted and implemented, the defendants will prosper and the community will pay the price in gun injuries, deaths, and ongoing fear. As the Illinois Supreme Court has held, a nuisance action lies for such damage to the public “where the ordinary method of prosecution for the criminal offense has proved ineffective or may in fact be ineffective.” *City of Chicago v. Cecola*, 75 Ill. 2d 423, 427-28, 389 N.E.2d 526, 528 (1979).

The community should not bear the burden of defendants’ irresponsible business practices, and there is a common law remedy available to this community on the facts pleaded, that is, properly tailored injunctive relief pursuant to the public nuisance doctrine. It is appropriate and traditional for the public nuisance doctrine to be invoked by a community where

an industry's irresponsible and unregulated business practices damage and disrupt the life of that community. See, e.g. Cecola, 75 Ill. 2d at 427-28, 389 N.E.2d at 528. A court is not legislating when it enforces existing common law doctrines, such as the public nuisance doctrine.

IV. CONCLUSION

This case, while of undeniably high visibility and unbelievably high stakes, nevertheless presents a straightforward and simple issue -- whether the Complaint states a cause of action for public nuisance. In determining that it did not, the Circuit Court literally ignored the high threshold in this state for dismissing a Complaint at the pleading stage. This concept is simply absent from the Circuit Court's opinion. Although, to be sure, there is no requirement that the Circuit Court recite the applicable standard for determining whether a Complaint states a claim for relief, the Court's failure to do so here is particularly problematic because this Complaint pleads every element of public nuisance supported by an astonishing array of factual detail. This, coupled with the troubling lack of clarity on the Circuit Court's part about why it was dismissing a well-pled and well-thoughtout Complaint brought by two local sovereigns, looks like nothing so much as prejudging the factual allegations, failing to understand the minimal pleading standards for a common law claim of public nuisance, a refusal to become involved in an issue with political overtones, or all of the above. This was unquestionably error.

The nuisance alleged is very real. People die or are maimed or paralyzed every day in the City of Chicago because of the ready availability of handguns. The social and financial costs are enormous. Those who foster the gun climate plainly interfere with the public right to be free from threats posed by illegal handguns. And, according to the allegations of the Complaint, which must be taken as true, it is these defendants who foster this climate -- intentionally, recklessly, or at least negligently. With a perfectly well-settled legal claim -- public nuisance --

and overwhelming factual allegations in support, there was, quite simply, no legal basis on which to dismiss this Complaint.

Nor, for that matter, should any non-legal consideration have been put into play here. Although the Circuit Court's unwillingness to enter a political issue seemed to lead it to dismiss the Complaint, the Court failed to understand that, in doing so, it simply became politically involved on the other side of the case. The Complaint has been filed. It alleges a public nuisance. It alleges full and active participation in creating that nuisance by these defendants. There is no authority for common law courts to decide that they would rather the legislature deal with the issue.

This Court's authority under the common law readily fills in for whatever the Circuit Court might have thought to be missing legislatively. This is but a claim for public nuisance like numerous others less controversial or politically charged. It should be treated as such. The dismissal of the Complaint should be reversed.

Dated: January 31, 2001

Respectfully submitted,

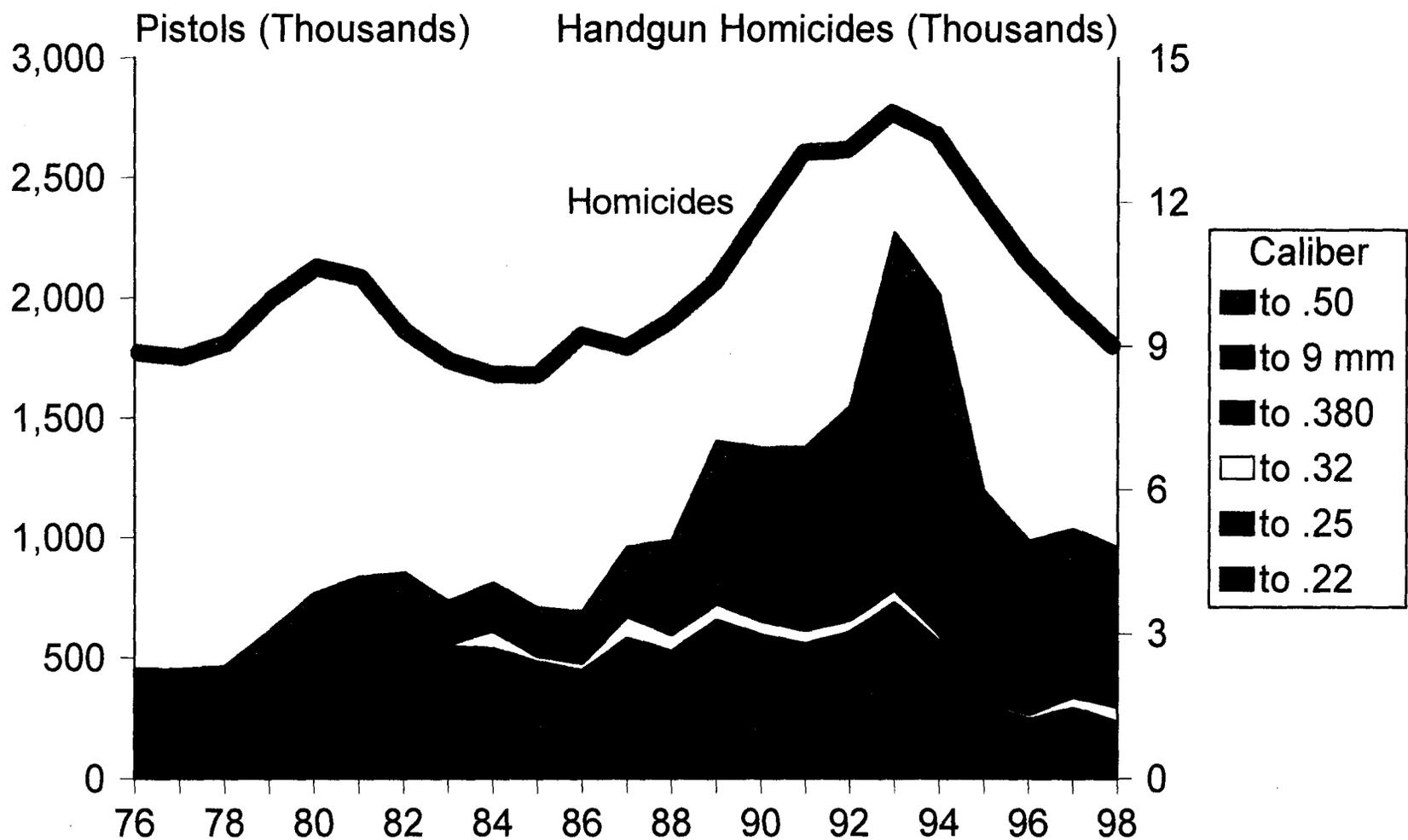
American Jewish Congress, Centro Comunitario Juan Diego, Chicago Project For Violence Prevention, Chicago Sinai Congregation, Handgun Control, Inc., Illinois Council Against Handgun Violence, Illinois Lawyers Of The Legal Community Against Violence, Illinois Peace Action, Interfaith Initiative Against Gun Violence, Million Mom March, National Association Of Social Workers, OnTarget Coalition, Pastor Robert McLaughlin, Reach Out And Touch, Inc., St. James Episcopal Cathedral, Uhlich Children's Home and Voices For Illinois Children

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APPENDIX

Handgun Homicide and Semiautomatic Pistol Production by Caliber, United States, 1976-1998



Data from Bureau of Justice Statistics
and Bureau of Alcohol, Tobacco and Firearms

VPRP