

Exhibit B

AFFIDAVIT OF RAY BEVIS, JR.

I, Ray Bevis, Jr., being duly sworn, deposes and says:

1. I, Ray Bevis, Jr. am over the age of 18, a citizen of the United States, and I am fully aware of the obligations of the oath.
2. I am an adult resident of Wolcott, CT.
3. I have personal knowledge of the facts stated herein, and if called as a witness, I could competently testify to these facts.
4. I am the Government Relations Representative of the Connecticut Citizens Defense League (“CCDL”) which is a nonprofit, educational foundation, incorporated under the laws of Connecticut with its principal place of business in Stratford, Connecticut. CCDL is a Plaintiff in this action.
5. On January 2, 2020, I requested information under the Connecticut Freedom of Information Act (“FOIA”) from the Special Licensing & Firearms Unit (“SLFU”) of the Department of Emergency Services and Public Protection (“DESPP”). Attached as **Exhibit 1** is a true and accurate copy of the January 2, 2020 FOIA request I sent to SLFU.
6. A few days after I sent my FOIA request to SLFU, I received a letter dated January 6, 2020 from the Legal Affairs Unit of DESPP, acknowledging receipt of my FOIA request. Attached as **Exhibit 2** is a true and accurate copy of said letter.
7. On January 10, 2020, I received an email from Carmen A. Rodriguez, Paralegal for the Legal Affairs Unit containing DESPP’s responses to my January 2, 2020 FOIA request. Attached as **Exhibit 3** is a true and accurate copy of said .
8. Pursuant to Conn. Gen. Stat. § 53-202d, no “assault weapons” could legally be registered (except for some very narrow exceptions) after January 1, 2014. Thus, the number of

“assault weapons” disclosed by SLFU in response to my January 2, 2020 FOIA request, 53,849, should be the same, or close to that number today.

9. On January 12, 2023, I sought additional information under FOIA from the SLFU. Attached as **Exhibit 4** is a true and accurate copy of said request.

10. Pursuant to my January 12, 2023 request, I received a letter from the Legal Affairs Unit of DESPP, acknowledging receipt of my request. Attached as **Exhibit 5** is a true and accurate copy of that document.

11. On January 13, 2023, I sent DESPP’s Legal Affairs Unit an email amending my January 12, 2023 FOIA request, adding a request for information regarding 2022, which I had neglected to include in my original FOIA request. Attached as **Exhibit 6** is a true and accurate copy of my updated request.

12. Later on January 13, 2023, DESPP’s Legal Affairs Unit responded to my email, agreeing to add my amendment to my original FOIA request. Attached as **Exhibit 7** is a true and accurate copy of said email.

13. On January 17, 2023, I received an email from Imisa Rivera, Unit Supervisor of SLFU containing SLFU’s responses to my January 12 and January 13 FOIA requests. Attached as **Exhibit 8** is a true and accurate copy of said email.

14. Based on SLFU’s responses to my FOIA requests, 1,306,867 firearms were in the state weapons registry database through 2021.


15. Based on SLFU’s responses to my FOIA requests, of the 1,306,867 firearms in the state weapons registry database through 2021, 53,849 (approximately 4.1%) were classified as “assault weapons.”

16. Based on SLFU's responses to my FOIA requests, of the 1,306,867 firearms in the state weapons registry database through 2021, 88,766 (approximately 6.8%) were classified as "other" firearms.

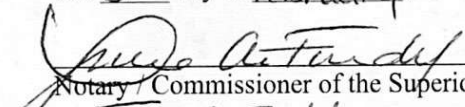
17. Pursuant to Conn. Agencies Regs. 29-36m-6, a person seeking to purchase a firearm in Connecticut must submit a Form DPS-3-C and obtain an authorization number prior to being legally authorized to purchase a particular firearm.

18. Based on SLFU's responses to my FOIA requests, in all of 2022, SLFU received 168,808 requests for DPS-3-C authorization numbers.

19. Further affiant sayeth not.


Ray Bevis, Jr.

Subscribed and sworn to, before me
this 3rd day of February, 2023


Notary Commissioner of the Superior Court
Julie A. Fardy
expires 4/30/24

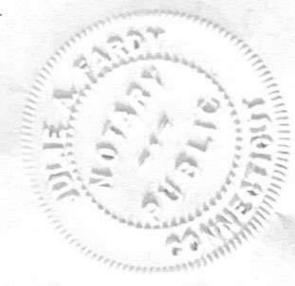


Exhibit 1



Ray Bevis <raybevisjr@gmail.com>

FOI request

1 message

Ray <raybevisjr@gmail.com>

Thu, Jan 2, 2020 at 12:41 PM

To: despp.legal@ct.gov

Bcc: Ray Bevis <legislative@ccdli.us>

To Whom it May Concern,

I requesting information about the number of active permits and the number of firearms and declared magazines. Please refer to my questions below.

Thank you for your time in advance.

Ray Bevis

- 1) How many active resident permit to carry pistols or revolvers?
- 2) How many active non-resident permit to carry pistols or revolvers?
- 3) How many active eligibility certificates for pistols and revolvers?
- 4) How many active eligibility certificates for the purchase of long guns?
- 5) How many active ammunition certificates?
- 6) How many registered assault weapons are in CT?
- 7) How many declared large capacity magazines are in CT?
- 8) How many firearms are in the state weapons registry database?

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Exhibit 2



STATE OF CONNECTICUT
DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
LEGAL AFFAIRS UNIT

Freedom of Information Act Request Response

January 6, 2020

Mr. Ray Bevis
raybevisjr@gmail.com

RE: Your Freedom of Information Act Request

Dear Mr. Bevis:

Your request for information has been referred to this office for review and response and will be processed in accordance with the provisions of the Freedom of Information Act and any other applicable provision of law.

Pursuant to statute, you may be charged with a fee for an item or service in connection with your request.

Please reference the file number indicated below on all communications to this agency to ensure timely processing of your request.

You will be notified as soon as possible of the results of our review as well as any fees that may be due.

Very truly yours,

Legal Affairs Unit

File No.: F-20-03795

*1111 Country Club Road
Middletown, CT 06457
Phone: (860) 685-8150/Fax: (860) 685-8611
An Affirmative Action/Equal Opportunity Employer*

Exhibit 3



STATE OF CONNECTICUT
DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
LEGAL AFFAIRS UNIT

January 10, 2020

Via Email Transmission - raybevisjr@gmail.com
Mr. Ray Bevis

RE: Your Freedom of Information Act Request

Dear Mr. Bevis:

Below please find the response to your Freedom of Information Act requests dated January 2, 2020.

1. How many active resident permit to carry pistols or revolvers? 272,465
2. How many active non-resident permit to carry pistols or revolvers? 16,695
3. How many active eligibility certificates for pistol and revolvers? 169
4. How many active eligibility certificates for the purchase of long guns? 1,357
5. How many active ammunition certifications? 3,008
6. How many registered assault weapons are in CT? 53,849
7. How many declared large capacity magazines are in CT? 2,663,417
8. How many firearms are in the state weapons registry database? 1,772,213

Please reference the file number indicated below on all communications to this agency to ensure proper handling of your request.

Should you have any questions concerning this matter, please do not hesitate to call this office at (860) 685-8150.

Very truly yours,

A handwritten signature in black ink, appearing to read "CAR" followed by a stylized flourish.

Carmen A. Rodriguez, Paralegal
Legal Affairs Unit

CAR:car
Enclosure

File No.: F-20-03795

*1111 Country Club Road
Middletown, CT 06457
Phone: (860) 685-8150/Fax: (860) 685-8611
An Affirmative Action/Equal Opportunity Employer*

Rodriguez, C

From: Ray <raybevisjr@gmail.com>
Sent: Thursday, January 2, 2020 12:42 PM
To: DESPP.Legal
Subject: FOI request

To Whom it May Concern,

I requesting information about the number of active permits and the number of firearms and declared magazines. Please refer to my questions below.

Thank you for your time in advance.

Ray Bevis

- 1) How many active resident permit to carry pistols or revolvers?
- 2) How many active non-resident permit to carry pistols or revolvers?
- 3) How many active eligibility certificates for pistols and revolvers?
- 4) How many active eligibility certificates for the purchase of long guns?
- 5) How many active ammunition certificates?
- 6) How many registered assault weapons are in CT?
- 7) How many declared large capacity magazines are in CT?
- 8) How many firearms are in the state weapons registry database?

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Exhibit 4



Ray Bevis <raybevisjr@gmail.com>

FOIA Request- DESPP/SFLU

1 message

Ray <raybevisjr@gmail.com>

Thu, Jan 12, 2023 at 11:52 AM

To: "DESPP.Legal" <DESPP.Legal@ct.gov>

Bcc: Ray Bevis <legislative@ccd.us>, Tom%20Maloney <maloneyta@comcast.net>

To Whom it May Concern;

Wishing you and your team a happy and healthy new year.

I'm seeking information under a FOIA request regarding the questions listed below.

Thank you in advance for your time and response.

Best regards,

Ray Bevis

- 1) How many active resident permits to carry pistols or revolvers are there?
- 2) How many of those active permits to carry a pistol or revolver are males?
- 3) How many of those active permits to carry a pistol or revolver are females?
- 4) How many active permits to carry a pistol or revolver are of the race of Asian?
- 5) How many active permits to carry a pistol or revolver are of the race of Black?
- 6) How many active permits to carry a pistol or revolver are of the race of Indian?
- 7) How many active permits to carry a pistol or revolver are of the race of White?
- 8) How many active permits to carry a pistol or revolver are of the race of unknown?
- 9) How many active permits to carry a pistol or revolver are of the race of Black and male?
- 10) How many active permits to carry a pistol or revolver are of the race of Black and female?
- 11) How many active permits to carry a pistol or revolver are of the race of White and female?
- 12) How many active permits to carry a pistol or revolver are of the race of white and male?
- 13) How many active non-resident permits to carry pistols or revolvers?
- 14) How many active eligibility certificates for pistols or revolvers?
- 15) How many active eligibility certificates for the purchase of long guns?
- 16) How many active ammunition certificates?
- 17) How many firearms are in the state weapons registry database?
- 18) How many firearms are in the state weapons registry database that are classified as "other"?
- 19) How many requests did SLFU receive for DPS-3-C authorization numbers in 2021?
- 20) How many requests did SLFU receive for DPS-3-C authorization numbers through the automated "interactive Voice Response" in 2021?
- 21) How many requests did SLFU receive for DPS-3-C authorization numbers through the automated internet/online system in 2021?
- 22) How many temporary denials were issued in 2021?
- 23) How many unique serial numbers (DESPP-419-C) has DESPP issued since the passage of PA 19-6?
- 24) Under PA 22-115 (effective October 1, 2022), how many times did DESPP notify a municipality for a failed background check when trying to purchase a firearm?

Thank you, Again.

Exhibit 5



STATE OF CONNECTICUT
DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
LEGAL AFFAIRS UNIT

Freedom of Information Act Request Response

January 12, 2023

Mr. Ray Bevis
19 Brookdale St.
Wolcott, CT 06716

RE: Your Freedom of Information Act Request

Dear Mr. Bevis:

Your request for information has been referred to this office for review and response and will be processed in accordance with the provisions of the Freedom of Information Act and any other applicable provision of law.

Pursuant to statute, you may be charged with a fee for an item or service in connection with your request.

Please reference the file number indicated below on all communications to this agency to ensure timely processing of your request.

You will be notified as soon as possible of the results of our review as well as any fees that may be due.

Very truly yours,

Legal Affairs Unit

File No.: F-23-08815

*1111 Country Club Road
Middletown, CT 06457
Phone: (860) 685-8150/Fax: (860) 685-8611
An Affirmative Action/Equal Opportunity Employer*

Exhibit 6



Ray Bevis <raybevisjr@gmail.com>

RE: FOIA request

1 message

DESPP.Legal <DESPP.Legal@ct.gov>
To: Ray <raybevisjr@gmail.com>

Fri, Jan 13, 2023 at 2:55 PM

Good Afternoon,

We will add it to the request.

Thank you,

Legal Affairs Unit

Department of Emergency Services and Public Protection

860-685-8150



From: Ray <raybevisjr@gmail.com>
Sent: Friday, January 13, 2023 2:21 PM
To: DESPP.Legal <DESPP.Legal@ct.gov>
Subject: FOIA request

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Legal Affairs,

On 1/12, I requested some information under FOIA (File No: F-23-08815).

Unfortunately, I failed to add the current year to my last request.

Would you be so kind to either amend my last request to add the questions below or accept this email as a second FOIA request?

I do apologize for any inconvenience.

Sincerely,

Ray Bevis

19 Brookdale St, Wolcott, CT 06716

1) How many requests did SLFU receive for DPS-3-C authorization numbers in **2022**?

2) How many requests did SLFU receive for DPS-3-C authorization numbers through the automated "interactive Voice Response" in **2022**?

3) How many requests did SLFU receive for DPS-3-C authorization numbers through the automated internet/online system in **2022**?

4) How many temporary denials were issued in **2022**?

Exhibit 7



Ray Bevis <raybevisjr@gmail.com>

RE: FOIA request

1 message

DESPP.Legal <DESPP.Legal@ct.gov>
To: Ray <raybevisjr@gmail.com>

Fri, Jan 13, 2023 at 2:55 PM

Good Afternoon,

We will add it to the request.

Thank you,

Legal Affairs Unit

Department of Emergency Services and Public Protection

860-685-8150



From: Ray <raybevisjr@gmail.com>
Sent: Friday, January 13, 2023 2:21 PM
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Dear Legal Affairs,

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Unfortunately, I failed to add the current year to my last request.

Would you be so kind to either amend my last request to add the questions below or accept this email as a second FOIA request?

I do apologize for any inconvenience.

Sincerely,

Ray Bevis

19 Brookdale St, Wolcott, CT 06716

1) How many requests did SLFU receive for DPS-3-C authorization numbers in **2022**?

2) How many requests did SLFU receive for DPS-3-C authorization numbers through the automated "interactive Voice Response" in **2022**?

3) How many requests did SLFU receive for DPS-3-C authorization numbers through the automated internet/online system in **2022**?

4) How many temporary denials were issued in **2022**?

Exhibit 8



Ray Bevis <raybevisjr@gmail.com>

RE: FOIA Request- DESPP/SFLU

1 message

Rivera, Imisa <Imisa.Rivera@ct.gov>

Tue, Jan 17, 2023 at 9:48 AM

To: Ray <raybevisjr@gmail.com>

Cc: "Lussier, Christina" <Christina.Lussier@ct.gov>, "Maurice, Brianna" <Brianna.Maurice@ct.gov>

Sir:

See answers to your FOIA Request below.

Let us know if you have any questions.

- 1) How many active resident permits to carry pistols or revolvers are there? **327,394**
- 2) How many of those active permits to carry a pistol or revolver are males? **241,371**
- 3) How many of those active permits to carry a pistol or revolver are females? **86,002**
- 4) How many active permits to carry a pistol or revolver are of the race of Asian? **4,976**
- 5) How many active permits to carry a pistol or revolver are of the race of Black? **27,556**
- 6) How many active permits to carry a pistol or revolver are of the race of Indian? **527**
- 7) How many active permits to carry a pistol or revolver are of the race of White? **288,344**
- 8) How many active permits to carry a pistol or revolver are of the race of unknown? **5,990**
- 9) How many active permits to carry a pistol or revolver are of the race of Black and male? **18,912**
- 10) How many active permits to carry a pistol or revolver are of the race of Black and female? **8,642**
- 11) How many active permits to carry a pistol or revolver are of the race of White and female? **73,941**
- 12) How many active permits to carry a pistol or revolver are of the race of white and male? **214,385**
- 13) How many active non-resident permits to carry pistols or revolvers? **21,891**
- 14) How many active eligibility certificates for pistols or revolvers? **183**
- 15) How many active eligibility certificates for the purchase of long guns? **1,882**
- 16) How many active ammunition certificates? **2253**
- 17) How many firearms are in the state weapons registry database? **1,306,867**
- 18) How many firearms are in the state weapons registry database that are classified as "other"? **88,766**
- 19) How many requests did SLFU receive for DPS-3-C authorization numbers in 2021? **169,765**
- 20) How many requests did SLFU receive for DPS-3-C authorization numbers through the automated "interactive Voice Response" in 2021? **DOES NOT EXSIST**

21) How many requests did SLFU receive for DPS-3-C authorization numbers through the automated internet/online system in 2021? **20,656**

22) How many temporary denials were issued in 2021? **25**

23) How many unique serial numbers (DESPP-419-C) has DESPP issued since the passage of PA 19-6? **56**

24) Under PA 22-115 (effective October 1, 2022), how many times did DESPP notify a municipality for a failed background check when trying to purchase a firearm? **Not sure what failed means?**

Addendum to original FOIA

1) How many requests did SLFU receive for DPS-3-C authorization numbers in **2022?** **168,808**

2) How many requests did SLFU receive for DPS-3-C authorization numbers through the automated "interactive Voice Response" in **2022?** **DOES NOT EXIST**

3) How many requests did SLFU receive for DPS-3-C authorization numbers through the automated internet/online system in **2022?** **89,846**

4) How many temporary denials were issued in **2022?** **361**

Imisa Rivera

Unit Supervisor

Special Licensing & Firearms Unit

1111 Country Club Road

Middletown, CT 06457

Ph 860-685-8011

Fx 860-685-8496

Imisa.Rivera@ct.gov



From: Ray <raybevisjr@gmail.com>
Sent: Thursday, January 12, 2023 11:52 AM
To: DESPP.Legal <DESPP.Legal@ct.gov>
Subject: FOIA Request- DESPP/SFLU

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Best regards,

Ray Bevis

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- 3) How many of those active permits to carry a pistol or revolver are females?
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- 5) How many active permits to carry a pistol or revolver are of the race of Black?
- 6) How many active permits to carry a pistol or revolver are of the race of Indian?
- 7) How many active permits to carry a pistol or revolver are of the race of White?
- 8) How many active permits to carry a pistol or revolver are of the race of unknown?
- 9) How many active permits to carry a pistol or revolver are of the race of Black and male?
- 10) How many active permits to carry a pistol or revolver are of the race of Black and female?
- 11) How many active permits to carry a pistol or revolver are of the race of White and female?
- 12) How many active permits to carry a pistol or revolver are of the race of white and male?
- 13) How many active non-resident permits to carry pistols or revolvers?
- 14) How many active eligibility certificates for pistols or revolvers?
- 15) How many active eligibility certificates for the purchase of long guns?
- 16) How many active ammunition certificates?
- 17) How many firearms are in the state weapons registry database?
- 18) How many firearms are in the state weapons registry database that are classified as "other"?
- 19) How many requests did SLFU receive for DPS-3-C authorization numbers in 2021?
- 20) How many requests did SLFU receive for DPS-3-C authorization numbers through the automated "interactive Voice Response" in 2021?
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- 22) How many temporary denials were issued in 2021?
- 23) How many unique serial numbers (DESPP-419-C) has DESPP issued since the passage of PA 19-6?
- 24) Under PA 22-115 (effective October 1, 2022), how many times did DESPP notify a municipality for a failed background check when trying to purchase a firearm?

Thank you, Again.