

**IN THE SUPREME COURT OF PENNSYLVANIA**

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**NO. 81 EAL 2022**

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**RASHAD ARMSTRONG,**

**v.**

**CITY OF PHILADELPHIA,**

**CEASEFIRE PENNSYLVANIA EDUCATION FUND, et al.,  
Intervenors.**

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**BRIEF OF *AMICI CURIAE* COUNTY AND LOCAL GOVERNMENTS AND  
THE PENNSYLVANIA MUNICIPAL LEAGUE IN SUPPORT OF THE  
CITY OF PHILADELPHIA'S PETITION FOR REVIEW**

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Mary Catherine Roper  
PA I.D. No. 71107  
John J. Grogan  
PA I.D. No. 72443  
Kevin Trainer  
PA. I.D. No. 326064  
LANGER, GROGAN & DIVER P.C.  
1717 Arch St., Ste 4020  
Philadelphia, PA 19103  
Tel: (215) 320-5660  
Fax: (215) 320-5703  
mroper@langergrogan.com

*Counsel for Amici Curiae*

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## I. INTEREST OF *AMICI CURIAE*<sup>1</sup>

*Amici Curiae* are Pennsylvania counties, cities, and townships, as well as County District Attorneys, and the Pennsylvania Municipal League, which works to empower and support local governments in the Commonwealth.

*Amicus* City of Aliquippa is a city of the third class. It has a population of approximately 9,200.

*Amicus* City of Chester is a city of the third class and is governed by a Home Rule Charter. Its population is approximately 32,600. Chester reduced gun homicides by 44 percent in 2021.

*Amicus* City of Lancaster is a city of the third class and is governed by the Optional Third-Class City Charter Law. It has a population of approximately 59,000. One of the guns purchased by Mr. Armstrong and not reported lost or stolen was recovered in the City of Lancaster.

*Amicus* City of Harrisburg is a city of the third class and is governed by the Optional Third-Class City Charter Law. Harrisburg's population is approximately 49,000.

*Amicus* City of Pittsburgh is the second largest city in the Commonwealth. Its population is approximately 300,000 and includes a metropolitan area of more than 2.3 million. It is a city of the second class by Statute and in 1974 adopted a Home Rule Charter.

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<sup>1</sup> *Amici curiae* certify that no party's counsel authored this brief in whole or in part, no party or party's counsel contributed money intended to fund this brief, and no person other than *amici*, their members, and their counsel contributed money intended to fund this brief.

*Amicus* City of Scranton is a city of the second class A and is governed by a Home Rule Charter. It is the sixth-largest city in the Commonwealth of Pennsylvania with a population of approximately 76,000. In Scranton, the Police Department seized six total firearms in 2017 and seven total firearms in 2018. By contrast, seizures accelerated to fourteen firearms in 2019, forty-six in 2020, twenty-five in 2021, and six so far in 2022. Similarly concerning, in 2020 Scranton also saw a number of firearms recovered in other jurisdictions that had been "straw purchased" in Scranton.

*Amicus* Abington Township, Upper Gwynedd Township, and Whitpain Township are all townships of the first class.

*Amicus* Bucks County is a second class A county. Its population is approximately 628,270. Bucks County is the fourth largest county in Pennsylvania, and it borders Philadelphia's northeast county line. In addition to great public schools, parks, scenic country sides, history, arts, and other culture, Bucks County's proximity to Philadelphia provides immeasurable value to the County's residents. According to census data through 2015, more than 34,000 Bucks Countians commute to and from Philadelphia each day. The blight of gun violence in Philadelphia is a threat to the countless residents of Bucks County who visit the city for jobs, education, nightlife, sporting events, and other recreation. Similarly, unchecked shootings and firearms trafficking in Philadelphia are a threat to the peace and tranquility of Philadelphia's neighbors in Bucks County.

*Amicus* Delaware County is a second class A county. Its population is approximately 576,830. Delaware County is the fifth largest county in the

Commonwealth. In 2021, there were a total of 52 gun-related deaths in the County, including 24 by suicide and 28 homicides.

*Amicus* Deborah Ryan is the District Attorney for Chester County. District Attorney Ryan took office in January 2020. The Chester County District Attorney's Office mission is to prevent, investigate, and prosecute crime, including those facilitated by firearms. Recently, Chester County has seen an increase in gun cases, including the use of ghost guns, straw purchased guns, and the use of guns in the facilitation of drug trafficking.

*Amicus* Jack Stollsteimer is the District Attorney for Delaware County. District Attorney Stollsteimer took office in January 2020. District Attorney Stollsteimer likewise has made combating gun violence a top priority for his office, forming the Chester Partnership for Safe Neighborhoods, which successfully reduced gun homicides in that city by 44 percent in 2021.

*Amicus* Pennsylvania Municipal League is a non-profit, non-partisan organization. It has provided services to local governments throughout the Commonwealth since 1900. The Pennsylvania Municipal League represents cities, boroughs, townships, towns, and home-rule municipalities by acting as an agent for cooperation and communication between local governments and the Commonwealth, as well as by voicing common policy perspectives before the legislative, executive, and judicial branches of both the state and federal governments. The Pennsylvania Municipal League serves 120 direct members representing over 3.6 million Pennsylvanians. The Pennsylvania Municipal League's member services and programs, including

educational opportunities and publications, reach more than 1,000 local governments.

This case is of acute concern to *amici curiae*. The Commonwealth Court’s decision below is the latest in a series of decisions from that court that misreads this Court’s seminal opinion in *Ortiz v. Commonwealth*, 681 A.2d 152 (Pa. 1996), and consequently wreaks havoc with the law of preemption. In misreading *Ortiz*, the Commonwealth Court has transformed an instance of carefully crafted express preemption into a broad and contourless exercise in field preemption. This is directly contrary to the teachings of this Court that field preemption is a disfavored and appropriately rare phenomenon which this Court has recognized in only four discrete areas. Indeed, in construing the statutory provision at issue here, 18 Pa. C.S. 6120(a), this Court has applied only express preemption, not field preemption. The Commonwealth Court’s use of field preemption cannot be squared with the letter or spirit of *Ortiz*, nor with this Court’s decades of precedent on the limited application of field preemption. Given the obvious urgency of the gun violence epidemic afflicting the Commonwealth, *amici*, who have constitutional obligations of their own to protect the health and welfare of their residents, respectfully urge this Court to grant review and correct the errors of the Commonwealth Court.

*Amici curiae* submit this brief with leave of court pursuant to Pennsylvania Rule of Appellate Procedure 531(b)(ii).

## **II. SUMMARY OF ARGUMENT**

Section 6120(a) prohibits local regulation of the “lawful ownership, possession, transfer or transportation of firearms, ammunition or ammunition components

when carried or transported for purposes not prohibited by the laws of this Commonwealth.” Philadelphia seeks to enforce a local ordinance that does not limit or regulate the lawful ownership, possession, transfer, or transportation of firearms or ammunition. Yet the Commonwealth Court has struck it down. *See City of Philadelphia v. Armstrong*, No. 1204 C.D. 2020, 2022 WL 432986, at \*10 (Pa. Commw. Ct. Feb. 14, 2022). That court found Philadelphia’s ordinance preempted by § 6120(a). That decision is but the latest decision in which the Commonwealth Court has badly misread *Ortiz v. Commonwealth*, 681 A.2d 152 (Pa. 1996), and flatly disregarded *Ortiz*’s conclusion that 18 Pa. C.S. § 6120(a) is an express preemption statute, and not an instance of the much broader and more intrusive field preemption.

The Commonwealth Court’s decision rewrites this Court’s field-preemption jurisprudence. Because preemption doctrine always implicates fundamental issues of democratic governance and denies the salutary effects of local policy making, the Commonwealth Court’s decision threatens not only confusion in a difficult area of the law but also usurps this Court’s proper role in ensuring conformity with the law as expressed in its own decisions.

This Court should grant review both because the holding of the Commonwealth Court conflicts with multiple holdings of this Court on the same legal question, and because the question presented is one of such substantial public importance as to require prompt and definitive resolution by this Court. *See Pa. R.A.P. 1114(b)(2), (4)*. *Amici* urge this Court to grant review and reverse the decision of the court below.

### III. ARGUMENT

#### A. **This Court should grant review because the Commonwealth Court’s decision conflicts with the long-standing preemption decisions of this Court.**

The doctrine of preemption is a necessary but limited component of our system of self-government. In that system, power and rulemaking authority are shared at multiple levels and among multiple bodies. The Legislature has the power to preempt local law. But the courts may not find a local law preempted without a clear indication from the Legislature.

This presumption against preemption is at the foundation of this Court’s long-standing preemption decisions. Those decisions recognize that every class of municipality possesses fundamental police powers to protect the general health and welfare of its citizens. *See Warren v. Philadelphia*, 115 A.2d 218, 220 (Pa. 1955). Indeed, even “[w]here the legislature has assumed to regulate a given course of conduct by prohibitory enactments,” a municipality still “may make such additional regulations in aid and furtherance of the purpose of the general law as may seem appropriate to the necessities of the particular locality and which are not in themselves unreasonable.” *Western Pa. Rest. Ass’n v. Pittsburgh*, 77 A.2d 616, 620 (Pa. 1951) (citations omitted).

Against the backdrop of this “presumption against preemption,” when the Legislature intends to exercise preemptive power, it usually does so expressly through clear language in the statutory text. Thus, using standard statutory interpretive principles, it is relatively easy to determine if preemption exists, and if so, what precisely is preempted.

In rare instances, this Court has found that the Legislature may also preempt local authority implicitly, through the doctrine of “field” preemption. *See, e.g., Mars Emergency Med. Servs., Inc. v. Adams Twp.*, 740 A.2d 193, 195 (Pa. 1999). For field preemption to exist, a court must find that state law leaves “no room” for local regulation, *see Holt’s Cigar Co., Inc. v. City of Philadelphia*, 10 A.3d 902, 921 n.6 (Pa. 2011), *and* that the Legislature had a clear and manifest intent to supersede all local rule, *Mars Emergency*, 740 A.2d at 195.

Given those strict standards, field preemption is rare. Indeed, this Court has found field preemption in just four areas—alcoholic beverages, anthracite strip mining, banking, and more recently, utility regulation. *See PPL Elec. Utilities Corp. v. City of Lancaster*, 214 A.3d 639, 652 (Pa. 2019); *Hoffman Min. Co. v. Zoning Hearing Bd. of Adams Twp., Cambria Cty.*, 32 A.3d 587, 593 (Pa. 2011). This Court has never held that Section 6120(a) demonstrates a legislative intent to preempt the field of firearms regulation. And in the two decades between *Ortiz* and *PPL Electric*, this Court consistently stated that its findings of field preemption were limited to the areas of alcohol regulation, anthracite mining, and banking. *Hoffman*, 32 A.3d at 593–94; *Fross v. Cty. of Allegheny*, 20 A.3d 1193 (Pa. 2011); *Huntley & Huntley, Inc. v. Borough Council of Borough of Oakmont*, 964 A.2d 855, 863 (Pa. 2009); *Nutter v. Dougherty*, 938 A.2d 401, 414 (Pa. 2007); *Hydropress Env’tl. Servs., Inc.*

*v. Twp. of Upper Mount Bethel, County of Northampton*, 836 A.2d 912, 918 (Pa. 2003).<sup>2</sup>

Field preemption is rare because it is contrary to normal democratic instincts about the desirability of local legislation in the area of health and welfare. Field preemption bars *all* local legislation. *Council of Middletown Twp., Del. County v. Benham*, 523 A.2d 311, 313 (Pa. 1987) (noting that a finding of field preemption means that “the state has retained all regulatory and legislative power for itself and no local legislation is permitted”). A finding of field preemption thus blocks local policies that are likely to be more sensitive to the diverse needs of a particular community; it stymies innovation and experimentation; and it lessens citizen involvement in the democratic processes. For this reason, field preemption “is the exception and not the rule.” *Id.*<sup>3</sup>

Legislative intent is the ultimate touchstone of a preemption analysis. *Commonwealth v. Shiffler*, 879 A.2d 185, 189 (Pa. 2005). When confronted with the question of whether a state law preempts a local law, courts look first to the text of

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<sup>2</sup> The Commonwealth Court, again reading well beyond this Court’s words, found it “significant” that this Court, in *Commonwealth v. Hicks*, 208 A.3d 916, 926 n.6 (Pa. 2019), referred in a footnote to “the General Assembly’s reservation of the exclusive prerogative to regulate firearms in this Commonwealth.” *Armstrong*, 2022 WL 432986, at \*4. *Hicks* is not in any sense a case about § 6120 or preemption, and for the court below to read that passing reference as a declaration of field preemption is plainly inconsistent with the gravity and depth of this Court’s established field preemption decisions. *See, e.g., PPL Electric*, 214 A.3d at 648–52.

<sup>3</sup> In addition to field preemption, state law may implicitly supersede local law through conflict preemption. This occurs when a local law conflicts with state law such that compliance with both is impossible, or when a challenged local law “stand[s] as an obstacle to the accomplishment and execution of the full purposes and objectives of the legislature.” *Duff v. Northampton Twp.*, 532 A.2d 500, 505 (Pa. Commw. Ct. 1987).

the statute. Where the text makes the legislative intent to preempt clear, the preemption inquiry ends there. *See* 1 Pa. C.S. §1921(b) (“When the words of a statute are clear and free from all ambiguity, the letter of it is not to be disregarded under the pretext of pursuing its spirit.”); *see also, e.g., Shiffler*, 879 A.2d at 189. For that reason, this Court has cautioned against reading beyond the clear text of the Legislature to presume a broader preemptive agenda. *See Dep’t of Licenses & Inspections v. Weber*, 147 A.2d 326, 328–29 (Pa. 1959).

The Commonwealth Court’s decision violates this Court’s fundamental preemption principles. It misreads *Ortiz* and in so doing effectively created an arena of field preemption in conflict with *Ortiz* and this Court’s longstanding approach to preemption questions.

Section 6120(a) preempts local rules that regulate the “lawful ownership, possession, transfer or transportation of firearms, ammunition or ammunition components when carried or transported for purposes not prohibited by the laws of this Commonwealth.” 18 Pa. C.S. § 6120(a). That plain text establishes the types of local regulation expressly preempted. It also defines the boundaries of the preemption. For example, by its terms, Section 6120(a) does not preempt municipal laws that regulate the *unlawful* ownership, possession, transfer, or transportation of firearms. *See, e.g., Minich v. Cty. of Jefferson*, 869 A.2d 1141, 1144 (Pa. Commw. Ct. 2005) (holding that Section 6120 does not apply where “ordinance does not regulate the lawful possession of firearms”); *cf. National Rifle Association v. City of Philadelphia*, 977 A.2d 78, 82 (Pa. Commw. Ct. 2009) (relying on *Ortiz*, rather than the statute, to hold that Section 6120(a) is not “limited to the lawful use of firearms”).

Nor does it preempt a local ordinance that does not concern the ownership, possession, transfer, or transportation of firearms in the first place.

The *Ortiz* Court’s interpretation of Section 6120(a) was as short as it was clear:

[Under Section 6120(a)] the General Assembly has denied all municipalities the power to regulate the ownership, possession, transfer or possession of firearms; and [here] the municipalities seek to regulate that which the General Assembly has said they may not regulate. The inescapable conclusion, unless there is more, is that the municipalities’ attempt to ban the possession of certain types of firearms is constitutionally infirm.

*Ortiz*, 681 A.2d at 155.

In *Ortiz*, this Court thus established a straight-forward framework for analyzing preemption challenges under Section 6120(a). Thus, courts faced with Section 6120(a) preemption challenges must ask whether the local rule “seek[s] to regulate *that which* the General Assembly *has said* they may not regulate,” *see id.* (emphases added), namely, the lawful ownership, lawful possession, lawful transfer, or lawful transportation of firearms. Using this framework, the *Ortiz* Court found the local ordinances preempted because each indisputably sought to regulate the “possession” of a “firearm.” *Id.*; *see also id.* at 154 (“It is undisputed that these ordinances purport to regulate the ownership, use, possession or transfer of certain firearms.”).

The Commonwealth Court’s ruling abandons that approach. First, the Commonwealth Court never acknowledged that the *Ortiz* Court found Section 6120(a) to be an *express* preemption statute. Instead, the Commonwealth Court held that the Legislature intended Section 6120(a) to preempt the *entire field* of local gun

regulation, *Armstrong*, 2022 WL 432986, at \*4, a finding this Court has never made and which flatly contradicts *Ortiz*'s discussion of the textual limitations built into Section 6120(a). As one Commonwealth Court judge has noted, that court's "field" preemption analysis is not based on any pronouncement of the Legislature:

[T]here is nothing in Section 6120 to demonstrate legislative intent to occupy the entire field of firearm regulation. Pertinent to this issue is the very heading of Section 6120 that currently reads: "Limitation on the regulation of firearms and ammunition." . . . [T]he heading of Section 6120 does not read "elimination" or "abolition" of local regulation. . . . Thus the legislature's use of "limitation" in the heading connotes restriction or boundary imposed upon local regulation as opposed to outright ban. Moreover, the Supreme Court indicated in *Nutter* that the legislature has asserted preemption in enough areas to know how to do it in explicit terms. The legislature has not explicitly asserted preemption of firearm regulation; therefore, it is reasonable to conclude that the City has authority to adopt ordinances if they do not regulate lawful ownership, possession, transfer or transportation of firearms etc. "when carried or transported" for purposes not prohibited by state law.

*Clarke v. House of Representatives of Com.*, 957 A.2d 361, 370 (Pa. Commw. Ct. 2008) (Smith-Ribner, J., concurring in part, dissenting in part), *aff'd*, 980 A.2d 34 (2009).

Despite dutiful references to *Ortiz*, the Commonwealth Court's decision below actually is driven by its own long history of misreading and overreading *Ortiz*. *Armstrong*, 2022 WL 432986, \*4 (observing that "this Court"—that is, the Commonwealth Court—"on a variety of occasions, has struck down legislation passed at the local level on the ground that the legislation was preempted by Section 6120(a)"). In relying on its own flawed decisions, the Commonwealth Court ignored Section 6120(a)'s plain text and this Court's preemption decisions.

The lack of fidelity to this Court’s decisions is serious in any context. It is more troubling in the area of preemption. Preemption displaces local authority. While it may be warranted in limited circumstances, displacing local authority by reading in implied field preemption, which is judicial intrusion into normal governance practice, is a significant error that demands prompt correction.

This Court’s direction is needed to clarify the high threshold to which the courts must adhere making preemption inquiries. Permitting the Commonwealth Court’s reasoning to stand will badly undermine the existing law of preemption and the fundamental principles of local autonomy that are threatened by it.

**B. This Court also should grant review to protect the ability of local governments to address local threats to the health and safety of their residents.**

Local governments have “police powers” to legislate for the welfare and protection of their residents. The indiscriminate application of preemption “prevent[s] municipalities from carrying out essential duties, as well as meeting the core wants and needs of their community.” Pennsylvania Municipal League, <https://www.pml.org/advocacy/local-preemption-in-pennsylvania/>. Nowhere is this more true than of the challenge posed by gun violence.

Gun violence has devastating impacts across the Commonwealth, but it manifests in different ways in different communities. Local governments are best situated to respond to violence in their own communities. Local governments are best informed about local problems, they can learn from and must respond to the demands

of the community, and they can tailor solutions to address the nuances of local problems, even where those problems have broader origins.

Many of the *amici* have seen the devastating effects of gun violence in their communities. In Pittsburgh, for instance, gun violence resulted in 499 homicides with a firearm, 2,178 aggravated assaults with a firearm, and 1,833 other nonfatal shootings between January 1, 2010, and December of 2020.<sup>4</sup> 2018 was a particularly grim year for Pittsburgh. The city had a high murder rate with 18.8 murders per 100,000 citizens. *Id.* The overwhelming majority (87 percent) of all homicides in Pittsburgh involved a firearm. *Id.*

Gun violence in Pittsburgh disproportionately affects Pittsburgh's Black residents. In 2016, the Allegheny County Department of Human Services explained: "African Americans make up only 27 percent of Pittsburgh's population, . . . [but] more than 80 percent of city homicide victims were black. On average, African Americans experienced homicide victimization at a rate 19 times greater than the rate for non-blacks." *Violence in Allegheny County and Pittsburgh, Allegheny Cty. Dep't of Human Servs.* at 2 (2016), <https://tinyurl.com/mr4ct2b8> (last accessed Mar. 15, 2022).

Pittsburgh's prohibition on assault weapons was one of the ordinances struck down by this Court in *Ortiz*. About twenty-five years later, following the horrific shooting at the Tree of Life Synagogue in Pittsburgh, the city enacted significantly

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<sup>4</sup> Allegheny County, Overall Violence Trends, City of Pittsburgh, 2010 to March 2021; Allegheny County, Homicides in the City of Pittsburgh, 2010 through February 2021; Allegheny County, Gun Violence, City of Pittsburgh, 2010 to March 2021.

narrower reforms, including regulations on the “use” of assault weapons and large capacity magazines. Pittsburgh Ordinances Nos. 2018-1218, 2018-1219. Pittsburgh also passed laws that penalized those whose negligent gun storage practices lead to a minor harming someone with their firearm, and set up a procedure for family members or law enforcement to request a judge to intervene if an individual with a gun is likely to harm themselves or others. Pittsburgh Ordinances Nos. 2018-1220. Nevertheless, the ordinances were challenged in court and the trial court, relying as it had to on the Commonwealth Court’s expansive preemption rulings, was forced to issue an injunction prohibiting the City from enforcing the ordinances. Pittsburgh vigorously maintains that the enacted ordinances are not preempted and litigation over these ordinances is currently pending before the Commonwealth Court. But because of that litigation the ordinances have never been enforced. The City’s residents are less safe as a direct result of the expansive interpretation of *Ortiz*.

Pittsburgh’s experience is not unique. Whether Section 6120(a) preempts local gun regulations concerns each *amicus*. Pennsylvania’s Special Council on Gun Violence, chaired by former Philadelphia Police Commissioner Charles Ramsey, issued a report in March of 2020 noting that gun violence is especially concentrated in historically disadvantaged neighborhoods, which are home to an “interplay of violence, crime, poverty and economic mobility.”<sup>5</sup> Further, whereas gun violence traditionally was concentrated in the largest cities, it is now reaching into Pennsylvania’s mid-sized cities. As noted above, one gun that Mr. Armstrong purchased but

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<sup>5</sup> See generally Special Council on Gun Violence, *Report of Findings, Recommendations & Action Steps*, Pa. Comm’n on Crime & Delinquency 22 (Mar. 2020), <https://tinyurl.com/3wpapjw4>.

failed to report as missing was recovered from a crime scene in Lancaster. *Armstrong*, 2022 WL 432986, at \*1. Finally, several *amici* have attempted to address the illegal use of guns in ways that they believed would not implicate the express preemption of Section 6120(a). All have been blocked by the Commonwealth Court’s misreading of *Ortiz*.

*Amicus* City of Harrisburg, for example, is contending with a fresh surge in gun violence. As Harrisburg Police Chief Thomas Carter noted, Harrisburg has been facing the “perfect storm”: with the COVID-19 pandemic, the closed school systems, and increasing firearm purchases. *We’re Talking About Saving the Life of a Young Kid: Harrisburg Police Vow to Curb Recent Spike in Gun Violence with Community’s Help*, Fox43 (Nov. 16, 2020), <https://tinyurl.com/2zf963wn> (last accessed Mar. 15, 2022). The City has in the past attempted to reduce gun violence through lost-and-stolen ordinances. But those sensible measures have been struck down. *See Firearm Owners Against Crime v. Papenfuse*, 261 A.3d 467, 470–71 (Pa. 2021).

The City of Lancaster similarly enacted a local ordinance to curtail the straw purchasing of firearms. But like the other municipalities, it was sued, and its power to protect its citizens is tied up in court. *See* Jason M. Breslow, *NRA Sues 3 Pennsylvania Cities Over Local Gun-Control Measures*, PBS Frontline (Jan. 16, 2015), available at <https://tinyurl.com/es8zjuh7> (last accessed Mar. 15, 2022).

As has been observed by *Amicus* Pennsylvania Municipal League, this expansive preemption of any regulation touching on firearms prevents *amici* from fulfilling their primary role: keeping their residents safe. “Municipal authority to respond to and find solutions for the unique problems facing their communities must

be preserved in order for municipalities to thoroughly protect the health, safety and welfare of their residents.” Pennsylvania Municipal League, <https://www.pml.org/advocacy/local-preemption-in-pennsylvania/>. The ability for local governments to make decisions and regulations when necessary should not be stymied by the unwarranted extension of preemption.

#### IV. CONCLUSION

For these reasons, *Amici* Municipalities and Local Governments and the Pennsylvania Municipal League respectfully request that this Court grant the City of Philadelphia’s petition for review.

Dated: March 16, 2022

Respectfully submitted,

/s/ Mary Catherine Roper

Mary Catherine Roper

PA I.D. No. 71107

John J. Grogan

PA I.D. No. 72443

Kevin Trainer

PA. I.D. No. 326064

LANGER, GROGAN & DIVER P.C.

1717 Arch St., Ste 4020

Philadelphia, PA 19103

Tel: (215) 320-5660

Fax: (215) 320-5703

[mroper@langergrogan.com](mailto:mroper@langergrogan.com)

[jgrogan@langergrogan.com](mailto:jgrogan@langergrogan.com)

[ktrainer@langergrogan.com](mailto:ktrainer@langergrogan.com)

*Counsel for Amici*

## CERTIFICATE OF COMPLIANCE WITH WORD LIMIT

I certify that this *Amicus* Brief was prepared in word-processing program Microsoft Word 365 (for Windows), and I further certify that, as counted by Microsoft Word 365, this *Amicus* Brief contains 4,063 words, and complies with Pa. R.A.P. 531(b)(3).

Dated: March 16, 2022

*s/ Mary Catherine Roper*  
Mary Catherine Roper

## CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

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Mary Catherine Roper