

Testimony of Christopher Killoy President and Chief Executive Officer, Sturm, Ruger & Company, Inc. Before the Committee on Oversight and Reform July 27, 2022

I. Introduction

Chairwoman Maloney, Ranking Member Comer, and distinguished Members of the Committee, my name is Christopher Killoy. I am the President and CEO of Sturm, Ruger & Company, Inc., more commonly known as Ruger.

As a father, husband, graduate of the United States Military Academy at West Point, former member of the Armed Services, responsible gun owner and American, I am deeply saddened by the horrific criminal events in Highland Park, Uvalde, Buffalo and elsewhere, and I condemn this criminal behavior in the strongest possible terms. I also wish to extend my sincerest sympathy to anyone who has lost a loved one as the result of a senseless crime. No words can express the pain and sorrow that comes with such a tragic loss.

The criminal misuse of firearms is a complex societal issue, and I sincerely hope the Committee is successful in investigating the root causes of the horrific tragedies that have taken place. Having served our country and worked in the firearms industry for over thirty years, I hope that, through my testimony today, I can offer you a helpful perspective regarding lawful gun ownership and safe and responsible firearm use in this country, consistent with the fundamental right guaranteed by the Second Amendment of our Constitution. I look forward to answering your questions on these topics. However, I am concerned that some of you today may be tempted to demonize particular firearms—or the law-abiding Americans who purchase them rather than focus on identifying and addressing the fundamental root causes of criminal violence.

Before delving into the issues raised by Chairwoman Maloney in her invitation to speak before you today, I offer a brief history of our Company, our customers and our products to help put those topics in context.

II. Ruger's Role as One of the Nation's Leading Firearms Manufacturers

Over the last 70 years, Ruger has grown from its modest beginnings in a small red barn in Southport, Connecticut, to one of the nation's leading manufacturers of rugged, reliable firearms for the commercial sporting market. We employ almost 2,000 hard-working Americans in Newport, New Hampshire; Prescott, Arizona; Mayodan, North Carolina; and Earth City, Missouri, with supporting staff spread around the country.

Like the rest of our country, the Ruger community is a collection of families, friends and neighbors. Our dedicated employees are proud to work in American manufacturing, evidenced by the facts that more than a quarter of our workforce has at least 10 years of service with the Company and well over 100 committed employees have been with us between 30 and 50 years. They, like Ruger, are unwavering in their commitment to safety and quality. They also go the

extra mile in giving back to our communities through activities including participation in fundraising for survivors of domestic violence, organizing food drives for neighbors in need, donating to animal shelters, and providing educational opportunities for local young people, among others. Every day, our hard-working and dedicated employees demonstrate their commitment to Ruger's core values of respect, integrity, teamwork and innovation through these community efforts, as well as their tireless efforts to produce safe and reliable firearms for our law-abiding customers.

Since 1949, Ruger has responsibly manufactured safe, rugged, reliable, high-quality firearm products. As with most consumer products, one size does not fit all. We make and sell a broad variety of firearm products to meet fluctuating consumer preferences and demand. In fact, Ruger offers nearly 800 variations of over 40 product lines across the Ruger and Marlin brands—ranging from traditional products like .22 caliber single-action revolvers and lever-action rifles to more contemporary products like semi-automatic pistols and modern sporting rifles. All are made in America.

We sell our firearm products through highly regulated channels to hard-working Americans who enjoy and exercise their constitutional right to own and use firearms for lawful purposes, including hunting, plinking, competition and target shooting, as well as self and home defense. The Second Amendment of the United States Constitution enshrines our right to do so. Yet, all too often, politicians and the media unfairly paint the firearms industry and gun owners as criminals or radical extremists.

To portray the vast majority of American gun owners in a negative light due to the deplorable, criminal acts of a handful of sick individuals is wrong, counterproductive and demonstrates a fundamental misunderstanding or disregard of the true root cause of the problem this Committee seeks to address.

III. Ruger's Long-Standing Commitment to Safety, Quality and Responsible Gun Ownership

Our motto, "Arms Makers for Responsible Citizens," is a clear statement of Ruger's culture and philosophy dating back almost 75 years.

In 1955, only a few years after the Company began operations, Ruger pioneered the practice of running full-page safety messages in the most popular firearms magazines. Our first such message reminded consumers that, "with the right of owning a firearm goes the constant responsibility of handling it safely and using it wisely." In the decades that followed, Ruger has continued the practice of publishing safety messages with *A Father's Advice, The Empty Chamber*, and other notable messages, copies of which I submit with my statement for your reference and ask that you permit them to be entered into the record.

Ruger's efforts to promote firearm safety have expanded as technology and consumer expectations have evolved. Our efforts now consist of a multi-faceted, multimedia approach. Our product offerings, instruction manuals, safety messages, instructional videos and Company publications, as well as our free safety retrofits and recalls, free gun locks, support of industry programs and other initiatives, collectively demonstrate Ruger's commitment to the lawful, safe and responsible ownership and use of firearms.

We have obtained dozens of patents over the years and incorporated a variety of safety features into our firearms, including our now-famous transfer bars, which have been incorporated into all Ruger single- and double-action revolvers for over 30 years. Other notable safety features incorporated into various firearms include:

- Loaded chamber indicators (to allow the user to visually and tactilely determine when the chamber of a pistol is loaded);
- Witness holes and inspection ports (to give the user a visual indication that a round is loaded in the chamber of a pistol);
- Magazine disconnects (to prevent the pistol from discharging when the magazine is removed, even though the gun may still be loaded with a round in the chamber);
- Striker blockers and firing pin blocks (to prevent the pistol from discharging without a pull of the trigger);
- Manual safeties (tang safeties, cross-bolt safeties, grip safeties, etc.) (to help prevent users from inadvertently firing the gun);
- Automatic safeties (for use in shotguns, these safeties automatically reengage each time the action is opened); and
- Internal locks (to allow use of a special key to lock the firearm and prevent it from being fired).

Ruger's commitment to safety is perhaps best exemplified by our long-running, free factory safety retrofit for "old model" single-action revolvers. The "old model" free safety retrofit is a program in which we install a transfer bar and related components into these older revolvers, thereby providing an additional measure of safety against accidental discharge in the event the user fails to take the basic safety precaution of leaving an empty chamber under the hammer. First announced in 1981, the safety retrofit program is now in its 41st year, and we continue to actively advertise it and convert "old model" single-action revolvers, free of charge.

We also have included gun locks with new firearms for decades. In 1987, long before required by federal law, Ruger pioneered the practice of shipping pistols with a gun lock. We subsequently expanded the practice to our entire handgun line and then across all product lines. Every new Ruger firearm shipped since 1998 has included a gun lock and detailed instructions on how to install it. To date, we have shipped more than 25 million locks.

In addition, Ruger supports numerous initiatives of the National Shooting Sports Foundation ("NSSF"), the trade association for the firearms industry, including *Project Childsafe*, the largest, most comprehensive firearm safety education program in the United States. *Project Childsafe* is designed to provide educational materials and locks to promote safe storage of firearms in the home. Data published by the Centers for Disease Control and Prevention

("CDC") indicate that accidental firearm deaths decreased more than 41 percent between the program's inception in 1999 and 2017, and that they remain near historic lows.

We also proudly support the NSSF's highly effective *FixNICS* initiative, launched in 2013. This program encourages state and local law enforcement to load applicable records into the Federal Bureau of Investigation's ("FBI") National Instant Criminal Background Check System ("NICS") database, to keep firearms out of the hands of individuals legally prohibited from possessing them. Between 2013 and 2017, in large part due to the efforts of the NSSF, the number of disqualifying records entered into the NICS database increased by 200 percent. This significant increase was driven by states like Pennsylvania, which has now submitted over 800,000 disqualifying records, compared to only one in 2012.

On March 23, 2018, the Fix NICS Act became federal law. This bipartisan legislation is a testament to the firearms industry's commitment to effecting positive change through enforcement of existing laws. In August 2020, the United States Department of Justice reported on the success of this law. The Department of Justice found that in the two years following the law's enactment, there was an increase of more than 8 million records—an 8.1 percent increase—in the three national databases searched with every NICS check. The report further ascribed the importance of federal agencies' plans to improve record reporting in compliance with the Fix NICS Act:

These figures are promising, but they tell only part of the story. Just as important are the systemic changes being made as federal agencies continue to execute their implementation plans. The improvements resulting from these new policies and procedures may be harder to quantify, but they are essential for the Act to have a lasting impact.¹

We do not oppose narrowly tailored legislation designed to address specific, identified gaps such as the Fix NICS Act. What we oppose is government overreach and unconstitutional legislation that demonstrates an unjustified bias against the firearms industry, its products and its law-abiding customers.

Recognizing that nearly two-thirds of all deaths from firearms in the United States are the result of suicide, Ruger also supports the NSSF in its partnership with the American Foundation for Suicide Prevention ("AFSP") to develop a "suicide prevention toolkit." This toolkit contains suicide prevention educational materials for in-store use and distribution to customers and encourages gun owners to carefully secure firearms when not in use, thereby preventing unauthorized access.

This partnership also brings AFSP community-based chapters together with NSSF member organizations to educate the gun-owning community about suicide, warning signs, risk factors and the importance of securely storing firearms to help prevent access in times of distress. A pilot of this program has been ongoing in four states since August 2016. This partnership is an

¹ U.S. Dep't of Justice, *The Attorney General's Semiannual Report on the Fix NICS Act* (Aug. 2020), *available at* <u>https://www.justice.gov/archives/ag/page/file/1303171/download</u>.

important piece of AFSP's Project 2025, a nationwide initiative to reduce the annual rate of suicide in the United States 20 percent by 2025.

Additionally, last year, we expanded our efforts on suicide prevention by partnering with Walk the Talk America ("WTTA"). WTTA's mission is to bridge the gap between mental health and firearms ownership by improving the quality and availability of mental health resources to gun owners. This non-political organization reaches beyond party lines and political beliefs, and aims to do the hard work needed to address mental health and suicide prevention. Not only do we support WTTA financially, but we are also working on projects to include WTTA materials in the packaging for every new Ruger firearm and to incorporate WTTA information on other consumer communications.

Although firearms manufacturers have come under intense scrutiny in the wake of tragic, highprofile criminal events, the reality—as demonstrated by these and Ruger's many other actions is that we remain committed to offering specific, effective solutions to the problems facing our communities while also providing safe, rugged and reliable firearms to responsible gun owners.

IV. Ruger's Demonstrated Commitment to Compliance and Cooperation with Law Enforcement

Ruger diligently works to comply with the extensive, complex and ever-changing legal framework surrounding the manufacture, distribution, marketing, use and ownership of firearms. The firearms industry is one of the most heavily regulated industries in the country, with thousands of federal, state and local laws, regulations and ordinances governing our firearms and our business.

Ruger employs a two-tier distribution model in which the vast majority of our sales are made to independent, federally licensed distributors. We annually review and appoint these independent distributors, who sell our products only to other distributors and federally licensed retailers. Downstream retailers ultimately sell Ruger-branded firearms (as well as other firearms brands) to consumers in accordance with federal, state and local laws. Thus, by the time any Ruger firearm reaches a consumer, it typically has been subject to three federally regulated transactions, one of which is also regulated by the state in which the firearm was purchased by the consumer.

As a federal firearms licensee, compliance is built into every aspect of our operations, and every Ruger employee from the production floor on up is individually accountable for ensuring our compliance with our regulatory obligations. For example, we have developed intricate methodologies to track firearms through our production process. Our process ensures that we are quickly alerted of any discrepancy so that, in the rare case a firearm is lost or stolen, we are able to quickly notify the Bureau of Alcohol, Tobacco and Firearms ("ATF") and appropriate law enforcement authorities. We also perform internal, wall-to-wall compliance inspections of all of our manufacturing facilities 3-4 times a year to verify compliance with ATF regulations, identify any potential gaps in our processes, and take immediate corrective action.

In addition to legal compliance, we develop and support relationships with law enforcement agencies, including ATF, to ensure open lines of communication and cooperation for public

safety. For example, we routinely assist law enforcement by responding to inquiries regarding how Ruger firearms operate, the date and location of manufacture, and other information helpful to them when investigating and prosecuting criminal cases.

We also routinely provide tours at all three of our production facilities to law enforcement personnel, including ATF agents, firearms and tool mark examiners, and crime lab experts. These tours provide law enforcement with information about our manufacturing processes, which enables them to better conduct investigations. For example, tours for the Association of Firearm and Tool Mark Examiners allow these professionals to understand our manufacturing processes and the tool marks that are created as a result. Through these and other actions consistent with our time-honored tradition of cooperation with law enforcement, we help to protect the public by supporting the individuals and entities entrusted by the public with the specific role of investigating and prosecuting criminal activity.

In addition to providing support for criminal investigations, Ruger takes numerous proactive steps to support law enforcement officers—ranging from participation in shows designed to educate officers regarding the products we offer to providing armorer training to dozens of departments and agencies across the country. We also support organizations such as the New Hampshire Chiefs of Police Association, the FBI National Academy, the International Association of Law Enforcement Firearms Instructors and the California Peace Officers Association through sponsorship programs.

Ruger also support the California Crime Victims Coalition, an organization formed in 2002 to provide support to officers and staff assaulted in the line of duty. Ruger produces commemorative firearms in support of this group. Those firearms are sold to officers in the California Department of Corrections and Rehabilitation, and a portion of the proceeds goes to support officers recovering from assaults suffered on the job.

The items detailed above are only a few of the many steps that Ruger has proactively taken to protect the public and the communities in which our employees live and work. While it is uncertain what the future will hold, we are confident that Ruger, guided by our core values of integrity, respect, teamwork and innovation, will continue our strong commitment to safety and dedication to compliance and cooperation with law enforcement.

V. Ruger's Commitment to Continue Supplying Lawful, Safe, Rugged and Reliable Products to Law-Abiding Gun Owners

As noted earlier, we at Ruger recognize that one size does not fit all. Firearm purchases in particular can be driven by deeply personal views, and a firearm that is desirable to one person may be undesirable to another. As a publicly traded company, we also have a fiduciary duty to maximize the value of the corporation and act in the best interest of Ruger's shareholders. For these reasons, we make over 40 product lines, only one of which includes modern sporting rifles.

Modern sporting rifles are lawful, popular products that are used safely by thousands of lawabiding citizens every day. They operate in much the same way as any other semi-automatic firearm; the rifle will fire one shot for each pull of the trigger, provided there is a round in the chamber and the safety is disengaged. Although the mechanism is different, this basic operation (one shot for each pull of the trigger) is the same as a myriad of rifle and pistol designs widely available for well over 100 years, including the Standard Pistol that our Company's founder, Bill Ruger, introduced in 1949.

Despite the rhetoric surrounding these particular products, modern sporting rifles are not inherently more dangerous than other popular firearms. They are used by law-abiding citizens for a variety of lawful purposes every day, including hunting, competition and target shooting, as well as self and home defense. Modern sporting rifles are not military issued and, unlike the military's M16 or M4, they do not fire multiple rounds automatically. Moreover, despite suggestions by certain members of this Committee that modern sporting rifles are the "weapon of choice" for violent criminals, research demonstrates that notion is a fallacy. For example, according to FBI data for 2019 (the most recent year for which data is available) rifles of all types, of which modern sporting rifles are only a small subset, were used in only 2.6 percent of all homicides in the United States.

Against this backdrop, I believe it is important for me to address certain misguided legislative proposals likely to be discussed during today's hearing. As an initial matter, I would submit to this Committee that any focus on "gun" violence is misplaced. We at Ruger believe in and support a focus on the reduction of *criminal* violence, and believe that this should unquestionably be the Committee's primary goal.

The *American Journal of Public Health* published an article in December 2021 entitled "Talking about 'Firearm Injury' and 'Gun Violence': Words Matter," by Marian Betz, et al. In it, the authors discuss the importance of word choice to promote honest and open conversation, as "the terms used can develop unintended consequences, such that word choice might promote trust or derail a conversation." We agree that language is important, and believe in the context of these hearings, the use of terms such as "gun violence" demonstrates that the Committee presupposes the solution to the problem before doing the hard work to understand this very complex societal issue. We would submit that the true problem this committee needs to solve is more simply one of violence – regardless of the means used to commit that violence.

Bear also in mind that the horrific events highlighted by today's hearing are a relatively recent phenomenon. Modern sporting rifles have been widely available to and owned by Americans for more than half a century. Firearms are also more heavily regulated today than at any other time in this nation's history, yet violent criminal acts have increased. Moreover, as I stated earlier, data clearly shows that rifles of all types, of which modern sporting rifles are only a small subset, are used in less than 3 percent of all homicides in the United States. Thus, if the Committee's goal is to identify a path to reduce violent crime across the country, I would submit that the myopic focus on a single, legal product is misplaced, misguided, and is an attempt to avoid doing the hard work of identifying the true root cause of the problem it is tasked with solving.

Again, we do not oppose narrowly tailored legislation designed to address specific, identified gaps. To that end, we respect those aspects of the recently passed Bipartisan Safer Communities Act that actually seek to address the underlying root cause of violence by expanding access to and funding of mental health treatment and providing funding to enhance security in schools.

But I urge you to resist the temptation to jump to the all-too-familiar conclusion that another arbitrary ban on an arbitrary feature of a rifle will somehow stem the tide of violence that is so clearly caused by much more complex and nuanced underlying societal issues. We at Ruger fundamentally believe that law-abiding citizens should not be stripped of constitutional rights due to the criminal and heinous actions of a very few individuals.

VI. Ruger's Goal of Educating Consumers Through Feature-Based Marketing

As to marketing, another focus of this Committee's investigation, I am proud of our marketing efforts and believe they reflect the integrity for which Ruger is known. Our advertisements, consumer communications and press releases are intended to educate consumers about new products introduced by the Company and the key features of each product offering.

This approach is no different for our modern sporting rifles than it is for our Marlin lever-action rifles, our single-action revolvers, or any of our other 40 product families. Our marketing of our popular modern sporting rifle, the Ruger AR-556, does not sensationalize the product or its use, but rather seeks to educate lawful, responsible citizens of the particular features that set our products apart from others to aid consumers in their decision-making process.

Further, as I have often stated in our quarterly earnings calls with investors, new products are vital to our business. Our advertising strategy generally follows our cycle of product launches, with the most attention devoted to those new products that drive our business. This approach is no different for our advertisement of modern sporting rifles.

We communicate, advertise and promote a product when it is launched, and we continue marketing support as the product becomes established and well understood through the distribution chain. Once our products are established in the distribution channel and consumers are familiar with the features and benefits of our products, the thrust of our marketing efforts turn to our next, newest product.

I am proud of our efforts, and believe that Ruger's long-standing reputation for quality, safety, and integrity keeps our loyal consumers interested in the new and innovative products that Ruger continues to offer.

VII. Conclusion

To conclude, it is my hope that the Committee is successful in investigating the real root cause of the appalling violent crimes that have taken place. I urge you to resist the temptation to lay blame on the firearms industry or law-abiding gun owners. We expect that members of this Committee will bear in mind their oath to uphold and defend the Constitution of the United States, and carefully consider the Second Amendment and the rights it enshrines as it deliberates on this very important issue. Thank you, and I welcome your questions.