Arms, Accessories, and Historical Tradition After Wolford v. Lopez

An analysis of Wolford, Heller, Bruen, Rahimi, Hemani, and the coming assault weapon and magazine cases

John P. Mark

In June 2026, the Supreme Court struck down a Hawaii law that banned licensed concealed-carry holders from carrying on private property open to the public, such as stores and restaurants, unless the owner said yes first. The Court did not decide anything about assault weapon bans, magazine limits, or suppressors. What it did was lay out, more clearly than before, exactly how courts must analyze any gun law: first ask whether the law touches on "arms" at all, and if it does, require the government to prove the law matches a real historical tradition rather than just a modern policy preference. That methodology is what will decide the assault weapon and magazine cases the Supreme Court has now agreed to hear. This article explains the ruling and what it signals for the fights still ahead.

I. Introduction

Wolford v. Lopez[i] is, on its face, a narrow decision about Hawaii's default rule for licensed concealed carry on private property open to the public. It does not decide assault weapon bans, magazine capacity limits, suppressors, short-barreled rifles, stun guns, knives, batons, or any of the other weapons categories that will occupy the courts over the next several years.

What makes the case worth close reading is not its holding but its method. Wolford continues the Court's post-Bruen[ii] effort to force Second Amendment litigation back into a disciplined sequence: does the challenged law implicate the Amendment's text, and if so, can the government show that the regulation is consistent with the nation's historical tradition of firearm regulation? Many lower courts have tried to shortcut that sequence, narrowing what counts as an "arm," recasting regulated items as mere "accessories," or smuggling dangerousness analysis into the threshold inquiry before the government ever has to carry its burden. Wolford makes that harder to do.

The opinion's most consequential move is definitional: the Second Amendment protects "arms," not just "firearms." That single word choice pushes the doctrine well past handguns and rifles, into territory that may include stun guns, knives, batons, ammunition, magazines, and quite possibly suppressors and other integral weapon components. None of this means every regulation of those items is unconstitutional. It means the government cannot dodge the historical-tradition inquiry simply by pointing out that the regulated item is not, by itself, a complete gun. The result in Wolford is narrow. Its analytic reach is not.

II. Source Access and Currency Statement

- Wolford v. Lopez — slip opinion reviewed directly.
- United States v. Hemani[iii] — slip opinion reviewed directly.
- Current assault weapon petition posture — drawn from public reporting and docket coverage.

Law checked for currency as of June 30, 2026.

III. The Holding

Hawaii's rule barred licensed concealed-carry permit holders from carrying handguns onto private property open to the public unless the owner expressly authorized it. The Court struck the rule down under the Second and Fourteenth Amendments, reasoning that it inverted the ordinary common-law default for such property. At common law, a member of the public has an implied license to enter a business open to the public until the owner withdraws it. Hawaii flipped that presumption, forbidding carry unless the owner affirmatively opted in.

The majority treated that flip as more than a property rule. Functionally, it operated as a statewide restriction on public carry, and the State could not escape scrutiny simply by dressing the restriction up as a default rule of trespass. Private owners remain free to exclude firearms from their own property. What the State cannot do, absent historical justification, is impose that exclusion as the default for every owner in the state.

IV. The Threshold Inquiry, Made Concrete

Before Wolford, courts often paraphrased Bruen's first step loosely, asking whether the Amendment's plain text "covers the conduct." Wolford tightens that into three discrete questions: does the law apply to "the people"; does it concern "arms"; and does it restrict keeping or bearing. Separating the threshold inquiry this cleanly matters because it keeps courts from smuggling the historical-tradition analysis into step one.

Take a ban on AR-15-style rifles. A court applying Wolford should not start by asking whether the rifle is too dangerous to protect. It should ask whether the rifle is an arm. If it is, and the law restricts keeping or bearing it, the constitutional presumption attaches, and the burden shifts to the government to justify the ban historically. The same logic extends naturally to magazines, ammunition, suppressors, stun guns, knives, and batons: the opening question is whether the regulation concerns arms and burdens keeping or bearing them, not whether the legislature had a good reason to act.

V. "Concerning Arms" Is Broader Than "Arms"

Wolford does not hold that every accessory or component is itself an arm, and it does not decide the status of suppressors, magazines, ammunition, optics, or parts. But its phrasing suggests the threshold inquiry sweeps more broadly than asking whether the regulated object is a complete firearm on its own.

A magazine ban concerns arms because magazines are integral to how most modern firearms function. An ammunition restriction concerns arms because ammunition is what makes a firearm usable at all. A suppressor rule concerns arms because it governs how a firearm is used. A stun gun ban concerns arms because a stun gun is itself a defensive weapon, and the same is likely true of batons. The unifying point is that a law can concern arms even when the specific object it regulates is not, standing alone, a complete firearm. That does not resolve the case. It only gets the case past the threshold and into the historical inquiry, which is where the real fight happens.

VI. The Presumption Does Real Work

Wolford reaffirms Bruen's burden-shifting structure: once the text covers the conduct, the law is presumptively unconstitutional, and the government must justify it through historical tradition. That is a stronger posture than ordinary interest balancing. The presumption assigns the risk of historical uncertainty to the government rather than to the citizen asserting the right.

Practically, if a court concludes that magazines, short-barreled rifles, stun guns, or batons fall within "arms," or that regulating them burdens keeping or bearing, the government cannot lean on modern policy arguments, crime statistics, or legislative findings. It has to produce genuine historical analogues.

VII. Default Rules Can Still Be Constitutional Burdens

Wolford is also, at bottom, a case about default rules. Hawaii did not ban carry outright; it changed the background default from opt-out to opt-in. The Court treated that shift as constitutionally significant in its own right, which matters well beyond the facts of this case. Governments frequently burden rights indirectly, not through an outright ban but through repeated permission requirements, costly compliance regimes, confusing defaults, or quiet shifts in who bears the burden of asking. Wolford signals that courts should look past the label to the function. If a default rule substantially burdens a constitutional right, the government still has to justify it.

Applied to the Second Amendment, that principle could reach carry permission systems, licensing delays, training mandates, insurance requirements, registration schemes, ammunition access restrictions, component restrictions, and "no carry unless expressly allowed" property defaults. The through-line is that a state cannot escape constitutional review just by converting a direct burden into a background rule.

VIII. Property Law Does Not Displace the Second Amendment

Hawaii framed its rule as property law, and the majority rejected that framing because the State was not simply protecting owners' right to exclude; it was imposing a statewide default that burdened licensed carry. Governments have a long history of recasting Second Amendment restrictions in other doctrinal clothing: property regulation, public nuisance, zoning, consumer safety, commercial regulation, taxation, insurance, public

health. Wolford does not say those categories are irrelevant, but it does say that relabeling a law does not remove it from Second Amendment scrutiny if the law burdens keeping or bearing arms. That point is likely to surface in litigation over gun stores, shooting ranges, ammunition sales, online sales, carry insurance, and firearm components.

IX. Historical Analogues Must Match in How and Why

The Court rejected Hawaii's reliance on old trespass and anti-poaching laws because those laws did not impose a comparable burden for a comparable reason. This is the "how and why" test from Bruen and Rahimi[iv], and it is unforgiving. An old law that happens to involve weapons is not enough. The government has to show that the historical law burdened the right in a relevantly similar way and for a relevantly similar reason.

That standard bites hardest in the assault weapon and magazine litigation. States cannot simply point to Bowie knife laws, trap gun statutes, or club and concealed-weapon regulations and declare that history supports weapons regulation in the abstract. For an assault weapon ban, the state has to explain why some historical restriction on a particular weapon justifies banning commonly possessed semiautomatic rifles today. For magazine limits, it has to explain why an old law justifies a capacity cap on ordinary feeding devices. For suppressors, it has to show whether there is genuine historical support for regulating sound-moderating devices, or whether modern suppressor law is really just twentieth-century policy dressed up as tradition. For short-barreled rifles, it has to show a historical tradition of regulating unusually concealable or unusually dangerous variants of otherwise ordinary arms. The weaker the historical fit, the weaker the government's case.

X. Justice Barrett's Concurrence

Barrett's concurrence does important housekeeping. Her point is that history serves two different functions in this analysis: some history helps define what the constitutional text covers, and other history helps determine whether a modern regulation is consistent with tradition. Those two inquiries should not collapse into each other.

That distinction matters because plenty of lower courts have used history at step one to narrow the right before the government ever has to shoulder its burden, effectively deciding that a weapon is "historically regulable" and therefore unprotected from the outset. Barrett's cleaner sequence asks first whether the text is implicated, and only then requires the government to justify the regulation historically. Applied to AR-15s, magazines, suppressors, short-barreled rifles, and non-firearm weapons, this means the analysis should move forward into history rather than dead-ending at the threshold.

XI. Not Every Old Law Is a Legitimate Analogue

Wolford also cautions against treating every historical statute as evidence of tradition. The Court expressed skepticism toward analogues rooted in racially oppressive regimes, including Black Codes and comparable measures designed to disarm disfavored groups. Bruen does not invite courts to treat every old weapons law as probative; some history reflects genuine tradition, and some reflects abuse. That distinction is likely to matter in

disputes over Bowie knife laws, public carry restrictions, Reconstruction-era disarmament statutes, and laws historically aimed at freedmen, immigrants, Native Americans, Catholics, or other disfavored groups. Age alone does not make a law a legitimate constitutional analogue.

XII. Public Discomfort Is Not Historical Tradition

The Court also rejected the idea that widespread public unease with carry, by itself, justifies burdening the right. That has obvious relevance to assault weapon bans, much of which is driven by public fear of certain weapons. Fear may carry real political weight, but Bruen asks for historical tradition, not contemporary preference. The government can argue that AR-15-style rifles are unusually dangerous, but that argument has to be tied to history rather than resting on the fact that many people find the weapons frightening. The same logic applies to suppressors, switchblades, batons, and other weapons that provoke public discomfort without a clear historical analogue.

XIII. Caetano[v] and Arms Beyond Firearms

Wolford's language about defensive weapons draws directly on Caetano, which already established that the Second Amendment is not frozen at the Founding's weapons technology. Caetano involved stun guns, and the Court rejected the argument that they fall outside the Amendment merely because they are modern, non-military, or did not exist in 1791.

That principle protects "arms," not merely muskets, pistols, and rifles. A modern defensive tool can qualify if it is a bearable weapon customarily used for lawful defense, which puts stun guns, tasers, pepper spray, collapsible batons, knives, switchblades, and nunchaku squarely within the doctrine's reach. The harder question for most of these items is not whether they are weapons. It is whether historical tradition actually supports regulating or prohibiting them.

XIV. Large-Capacity Magazines

Magazine restrictions are the clearest test case for the "concerning arms" problem. A magazine is not the whole firearm, but it is integral to how most modern firearms operate, and a cap on magazine capacity plainly regulates how commonly owned firearms are kept and used. There are three ways a court could frame the question:

1. Magazines are themselves arms, because they are necessary components of a functional firearm.
2. Magazines are protected ancillary components — not independently "arms," but their regulation still burdens the right to keep and bear arms by restricting effective operation.
3. Magazines are mere accessories, outside the Second Amendment altogether — the position governments typically favor.

Wolford undercuts the third framing as an escape hatch from historical analysis. A ban on standard firearm feeding devices concerns arms even if a court hesitates to call the magazine itself an arm. The live question then becomes whether history supports a numerical capacity limit on common feeding devices, and the Supreme Court has not yet answered it.

XV. Suppressors

Suppressors are a harder case than magazines. A suppressor is not necessary for a firearm to fire and does not define its core operation, which is why courts have generally treated suppressors as accessories rather than arms. But the issue is not closed. A suppressor regulation still governs how a firearm is used, and suppressors have plausible safety functions, including hearing protection and blast or recoil management.

The government's strongest card is that suppressors have long been regulated under the National Firearms Act. The challenger's best response is that a 1934 statute is not Founding-era history, and Bruen generally demands a deeper analogue than twentieth-century regulatory practice. My assessment is that suppressors sit in the middle of the spectrum: a stronger claim than cleaning kits or optics, weaker than ammunition or magazines, and genuinely contested rather than settled either way.

XVI. Ammunition

Ammunition presents the strongest "accessory" case of all. A firearm without ammunition is useless for armed defense, so a severe restriction on ammunition functions almost like a restriction on the firearm itself. A court should have little difficulty finding that ammunition regulation concerns arms and burdens keeping or bearing them. The historical question remains open, but the threshold argument here is about as strong as it gets.

XVII. Short-Barreled Rifles

Short-barreled rifles are a different animal because they are not accessories at all — they are firearms, specifically rifles with barrels shorter than the statutory threshold. The threshold question is easy: a short-barreled rifle is an arm, and regulating it burdens keeping or bearing arms. The hard question is historical justification.

The government will lean on *United States v. Miller and the National Firearms Act*[vi], but Miller is narrower than it is often given credit for. It did not hold that short-barreled weapons categorically fall outside the Second Amendment; it held that, on the record before that Court, there was no evidence connecting a short-barreled shotgun to militia efficiency. *Heller*[vii] later reframed Miller through the lens of "common use" and "dangerous and unusual," which creates an unresolved puzzle: if ordinary rifles are protected, at what barrel length does constitutional protection disappear, and is the relevant concern concealability, criminal misuse, military utility, historical regulation, or common use? The Supreme Court has not said.

The challenger's case runs roughly as follows: a short-barreled rifle is still a rifle; barrel length alone should not strip constitutional protection; if these rifles are commonly possessed for lawful purposes, calling them "unusual" is a stretch; and a 1934 statute is too recent to define the original constitutional tradition. The government's case runs the other way: short-barreled rifles have long been treated as unusually dangerous and concealable; they fit within a tradition of regulating weapons associated with criminal misuse; Miller remains good law; and even if they qualify as arms, they may still be regulable as dangerous and unusual. This is a genuinely open and serious question.

XVIII. Stun Guns, Tasers, Batons, and Switchblades

Non-firearm weapons illustrate most clearly that "arms" reaches beyond firearms.

Stun guns and tasers

After Caetano, these have a strong claim to coverage as bearable defensive weapons; their modernity does not exclude them.

Collapsible batons

A baton is a defensive weapon and likely qualifies as an arm, or at minimum its regulation concerns arms. The historical inquiry would focus on old regulations of clubs, billy clubs, truncheons, and concealed impact weapons.

Switchblades

Knives have long served as both arms and tools, and a switchblade is plainly a weapon. But the government can point to a genuine historical tradition of regulating concealed knives, Bowie knives, dirks, and daggers, while the challenger will argue that banning an entire category of knife differs materially from regulating concealment or misuse.

Pepper spray

Probably protected, though the doctrine here is thin. It is a defensive weapon in wide lawful use and far less lethal than a firearm, but because chemical sprays are a modern development, a historical analogue may be hard to find.

The broader point holds across all of these: a weapon does not lose Second Amendment relevance simply because it is not a gun.

XIX. The Common Use Problem

The deepest unresolved question in this whole area is what happens when a weapon is both historically regulated in some form and in common lawful use today. Heller protects arms in common use for lawful purposes. Bruen requires modern regulations to match historical tradition. When those two principles point in different directions, something has to give, and there are three plausible ways the Court could resolve the tension.

Under a common-use-controls model, once an arm is commonly possessed for lawful purposes, it cannot be banned outright, though historical tradition may still support

manner restrictions. This is the strongest position available to Second Amendment plaintiffs. Under a history-controls model, common use is relevant but not decisive, and a genuine historical tradition of regulating comparable weapons can sustain a modern ban. This is the strongest government position.

The most likely synthesis is a third, hybrid model: common use establishes strong constitutional protection, the government may still offer historical analogues, but the more common an arm is for lawful purposes, the closer and stronger the historical analogue has to be. A ban on a widely owned arm should require a tighter historical fit than a regulation of an uncommon or especially dangerous weapon. This approach gives real force to both Heller and Bruen, and it fits naturally with the "dangerous and unusual" formulation. If that phrase is read conjunctively, a weapon that is dangerous but widely possessed for lawful purposes is hard to call unusual, and common use becomes a genuine barrier to prohibition rather than an afterthought.

XX. Assault Weapon Bans, Wolford, and the Third Circuit

The pending assault weapon litigation raises what is arguably the single most important unresolved question in modern Second Amendment law: may a state prohibit an entire class of semiautomatic rifles that are indisputably bearable arms and are lawfully possessed by millions of Americans? Neither Heller, Bruen, Rahimi, Hemani, nor Wolford answers that question directly. Each supplies a piece of the analytical framework the answer will eventually be built on.

The Evolution of the Doctrine

The Court's Second Amendment jurisprudence has developed incrementally, and each case has left real gaps for the next one to fill. Heller established four propositions that matter here: the Second Amendment protects an individual right; it protects "arms" generally, not just militia weapons; arms in common use for lawful purposes receive constitutional protection; and historical tradition permits regulation of weapons that are "dangerous and unusual." What Heller never did was explain how those four propositions relate to one another. It left "common use" and "dangerous and unusual" undefined, never said whether "dangerous and unusual" is a conjunctive or disjunctive test, and never explained how common use interacts with a historical tradition of regulation. Those gaps are still open.

Bruen changed the methodology more than it filled those gaps. Instead of asking whether a regulation reasonably advances public safety, courts must now ask whether the government has shown the regulation to be consistent with the nation's historical tradition of firearm regulation, which shifted the inquiry away from policy balancing and toward constitutional history. Rahimi refined that framework without displacing it, clarifying that historical analogues need not be identical twins but do need to be relevantly similar, while leaving the burden of production squarely on the government. Hemani reaffirmed that allocation directly: the Court unanimously rejected a status-based firearm prohibition because the government could not establish a sufficiently analogous historical tradition. Wolford reinforces the same discipline rather than departing from it. It did not revive intermediate scrutiny, did not engage in interest balancing, and once again

required the government to justify the restriction through history. Read together, these cases form a doctrinal line that has stayed remarkably consistent even as the fact patterns have varied.

The Central Constitutional Question

The assault weapon litigation is not, at bottom, a dispute about whether AR-15-style rifles are dangerous, what the crime statistics show, or what legislatures found when they passed these bans. The constitutional question is narrower than that: has the state carried its burden of showing a historical tradition close enough to justify prohibiting a class of arms that millions of Americans lawfully possess? That question breaks down into several sub-questions the Court has never squarely resolved.

Whether an AR-15-style rifle counts as an "arm" is probably the easiest of them. The text protects "arms," an AR-15 is unquestionably a bearable weapon, and there is little room to argue it falls outside the constitutional category.

Whether these rifles are in "common use" is harder. The Court has never said how many firearms in circulation establish common use, whether that measure is national or local, whether civilian ownership alone is enough, whether lawful defensive use has to be shown, or whether sheer popularity can establish constitutional protection on its own. AR-15-style rifles are among the most commonly owned rifle types in the United States. Whether that fact is constitutionally dispositive is a separate question the Court has not answered.

The hardest question is whether "dangerous and unusual" can override common use. Three approaches are available. Under the first, common use effectively settles the question: a firearm lawfully possessed by millions of citizens cannot simultaneously be called unusual. Under the second, historical regulation controls regardless of how many people currently own the weapon. The third, and in my judgment the most likely outcome, treats common use and historical tradition as working together, with common use creating a strong constitutional presumption that the government can still overcome with a sufficiently persuasive historical showing. The Supreme Court has not yet chosen among these three approaches.

Wolford's Contribution

Wolford does not resolve any of these questions, but it does something that may matter just as much: it fixes the order in which courts have to work through them. A court must first determine whether the law implicates the Second Amendment's text, then treat the law as presumptively unconstitutional once it does, then require the government to establish a genuinely analogous historical tradition, and only then ask whether the government has carried that burden. Sequencing the analysis this way makes it harder for a court to dodge the hard historical questions simply by redefining what counts as a protected "arm" at the outset.

Implications for the Third Circuit

The Third Circuit is left facing questions the Supreme Court has never squarely answered: what constitutes an "arm," what constitutes "common use," whether "dangerous and

unusual" is conjunctive, how much historical similarity is enough, whether twentieth-century firearm regulations can establish a historical tradition on their own, and how courts should treat modern firearms with no precise Founding-era analogue. These are exactly the questions now before the Supreme Court in the pending assault weapon cases, and whatever framework the Court ultimately adopts will almost certainly become the controlling analysis for New Jersey's own assault firearm litigation.

XXI. Magazine Capacity Litigation After Wolford

Magazine-capacity litigation may end up being even more doctrinally significant than the assault weapon cases, because it forces courts to confront a question the rifle cases can mostly sidestep: what exactly is being protected. Three constitutional theories have emerged to answer it.

The first treats magazines as arms in their own right, on the theory that a detachable magazine is an integral component of a functional firearm and that many modern semiautomatic firearms cannot operate as designed without one. The Supreme Court has never adopted or rejected this theory. The second treats magazines as not independently protected arms but as constitutionally protected components of arms, similar to how the First Amendment protects printing presses and paper as the means of exercising the underlying right, or how the Fourth Amendment protects the means necessary to exercise its guarantees. The Court has never addressed this theory directly either. The third and narrowest theory sets aside the question of whether magazines are arms or protected components at all, and asks instead whether restricting commonly possessed magazines burdens the right to keep and bear arms by interfering with how protected firearms ordinarily function.

Wolford's structured approach to the threshold inquiry arguably strengthens this third theory, since it directs courts to ask whether a law concerns arms before moving on to the historical analysis. That does not establish constitutional protection for magazines on its own. It simply makes it harder for a court to end the inquiry at the threshold by waving magazines away as "mere accessories."

If a court does conclude that magazine restrictions implicate the Second Amendment, the government's burden gets substantially heavier. It has to identify historical regulations genuinely analogous to a modern numerical capacity limit, which raises questions no Supreme Court decision has yet answered: were there historical limits on ammunition capacity, analogous restrictions on repeating firearms, or historical prohibitions on commonly possessed firearm components tied to capacity.

The assault weapon cases now pending before the Court may answer only part of this. If the Court holds that commonly possessed semiautomatic rifles are protected arms, the argument for protecting their ordinary magazines gets considerably stronger. If instead the Court finds that historical tradition permits banning those rifles outright, magazine litigation will likely take a different path entirely. Either way, the forthcoming assault weapon decisions are likely to become the doctrinal foundation the next generation of magazine litigation gets built on.

XXII. Practical Litigation Implications

Wolford hands future plaintiffs a working playbook:

- Do not let the government narrow step one.
- Force the court to identify whether the law concerns arms.
- Keep "is it an arm?" analytically separate from "may it be regulated?"
- Lean on the presumption of unconstitutionality.
- Demand specific historical analogues, not generic ones.
- Attack analogues that differ in purpose or burden.
- Challenge tainted or outlier historical laws directly.
- Use Caetano to bring non-firearm weapons within the doctrine.
- Use common use to resist "dangerous and unusual" classification.
- Argue that twentieth-century regulation arrived too late to define the original right.

Governments will push back with their own set of arguments: that Wolford is a carry case, not a weapons-ban case; that its holding is limited to private-property default rules; that Bruen and Rahimi call for analogical reasoning, not historical twins; that some weapon categories have long been regulable; that common use cannot constitutionalize a weapon merely because it becomes popular; that accessories are not necessarily arms; and that the National Firearms Act and later statutes reflect longstanding acceptance of certain regulations. Both sides have real arguments, and the Supreme Court has not yet settled the hierarchy among common use, dangerous and unusual, and historical tradition.

XXIII. Bottom Line

Wolford is not an assault weapon case, a magazine case, a suppressor case, a short-barreled rifle case, or a stun gun, baton, or switchblade case. It is a methodology case, and its value lies in how clearly it lays out the sequence lower courts are supposed to follow: start with the constitutional text; ask whether the law concerns arms and restricts keeping or bearing them; if so, treat the law as presumptively unconstitutional; require the government to justify the regulation through historical tradition; do not let modern policy balancing substitute for that showing; do not let relabeling avoid the Second Amendment; do not treat every old law as a legitimate analogue; and keep the threshold inquiry and the historical inquiry analytically separate.

That framework has real implications for assault weapon bans, magazine limits, short-barreled rifles, suppressors, ammunition restrictions, stun guns, knives, batons, and every other category of weapon regulation working its way through the courts. The hardest open question is still this: when an arm is in common lawful use but the government can point to some historical tradition of regulating it, which principle wins?

My own read is that the answer will not be absolute. Common use probably does not foreclose historical inquiry altogether, but it should raise the government's burden, and a ban on a common arm should require a particularly strong historical analogue to survive.

That is where the next major assault weapon case is likely to matter most. It may finally tell lower courts whether Heller's "common use" principle is a real constitutional floor or just one factor among several in Bruen's historical analysis. Until then, Wolford's real contribution is not that it answers the big weapons-ban questions. It is that it makes those questions much harder for lower courts to sidestep.

About the Author

John P. Mark is a retired attorney and a 1982 graduate of New York University School of Law. His practice spanned commercial law, corporate law, securities law, engineering, procurement, and construction contracting, mergers and acquisitions, and corporate governance. He is involved in the practical shooting sports as a competitorhow courts must analyze, and holds Chief Range Officer and Range Officer certifications across multiple shooting disciplines. He is also an NRA-certified firearms instructor.

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[i] *Wolford v. Lopez*, No. 24-1046, slip op. at __ (U.S. June 25, 2026)
[ii] *N.Y. State Rifle & Pistol Ass'n, Inc. v. Bruen*, 597 U.S. 1 (2022).
[iii] *United States v. Hemani,* No. 24-1234, slip op. at __ (U.S. June 18, 2026)
[iv] *United States v. Rahimi*, 602 U.S. 680 (2024).
[v] *Caetano v. Massachusetts*, 577 U.S. 411 (2016) (per curiam)
[vi] *United States v. Miller*, 307 U.S. 174 (1939)
[vii] *District of Columbia v. Heller*, 554 U.S. 570 (2008)