

October 12, 2023

VIA ECF

Catherine O'Hagan Wolfe
Clerk of the Court
United States Court of Appeals for the Second Circuit
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Antonyuk v. Nigrelli*, Nos. 22-2908 (L), 22-2972 (C) (argument held March 20, 2023, before Judges Jacobs, Lynch, and Lee)

Dear Ms. Wolfe:

Pursuant to F.R.A.P. 28(j), amicus curiae Everytown for Gun Safety writes to notify this Court of supplemental authority supporting the constitutionality of the restrictions on firearms in parks in New York's Concealed Carry Improvement Act ("CCIA").¹ In its amicus brief, Everytown pointed to 66 individual historical restrictions on firearms in parks and a compilation of federal restrictions. *See* Dkt. 193 (No. 22-2908) at 26 n.21 (linking to website).² Everytown has since identified 53 additional examples and sources. We attach the full list as Exhibit A, with newly identified restrictions and sources highlighted.

Although Everytown attorneys have focused on locating parks restrictions specifically, this research has taken considerable time. Historical research is a slow and cumulative process. *See id.* at 21-22; *see also, e.g.*, Antonin Scalia, *Originalism: The*

¹ Federal courts of appeals, including this Court, have accepted 28(j) letters from amici. *See, e.g., In re Clinton Nurseries, Inc.*, No. 20-1209, Dkt. 104 (2d Cir. filed May 5, 2021); *Kuhne v. Cohen & Slamowitz, LLP*, 579 F.3d 189, 193 (2d Cir. 2009). *See generally United States v. Broadcast Music, Inc.*, No. 16-3830, Dkt. 192 (2d Cir. Nov. 22, 2017) (court order stating that amici are "free to" respond to government filing "in a 28(j) letter").

² Those restrictions, previously in the two cited website locations, are now collected at *Parks Restrictions*, <https://everytownlaw.org/everytown-center-for-the-defense-of-gun-safety/sensitive-places/parks-restrictions>, together with the newly identified laws.

Lesser Evil, 57 U. Cin. L. Rev. 849, 856-57, 861 (1989) (stating that, when “[p]roperly done,” the “often exceedingly difficult” task of “plumb[ing] the original understanding of an ancient text” requires, among other things, “consideration of an enormous mass of material”).

Even without these supplemental examples, the historical record robustly demonstrates that the CCIA’s restriction is constitutional. *See, e.g.*, *Everytown Br.* 22 n.17, 26. Because, however, the “job of judges is not to resolve historical questions in the abstract,” *N.Y. State Rifle & Pistol Ass’n v. Bruen*, 142 S. Ct. 2111, 2130 n.6 (2022), *Everytown* respectfully submits that a more developed historical record will only aid this Court’s inquiry.

Sincerely,

/s/ Janet Carter
Janet Carter
Counsel for amicus curiae
Everytown for Gun Safety

Cc: All Counsel of Record

EXHIBIT A

TABLE OF PARKS RESTRICTIONS

Links are to public databases (Hathi Trust, Google Books) where available; otherwise to subscription-based databases (HeinOnline, Making of Modern Law (“MoML”).

A PDF compilation of all restrictions listed below is available at <https://everytownlaw.org/everytown-center-for-the-defense-of-gun-safety/sensitive-places/parks-restrictions/>

	Location	Year	Citation	Key language	Link
1	New York, NY	1858	<i>Minutes of Proceedings of the Board of Commissioners of the Central Park 166 (1858)</i>	“All persons are forbidden ... [t]o carry fire-arms ... within [Central Park].”	https://tinypurl.com/5n6zvd5b (Google Books)
2	New York, NY	1861	<i>Fourth Annual Report of the Board of Commissioners of the Central Park 106 (1861)</i>	“All persons are forbidden ... [t]o carry firearms or to throw stones or other missiles within [Central Park].”	https://tinypurl.com/bdfamfub (Hathi Trust)
3	Brooklyn, NY	1866	Park Ordinance, No. 1, <i>Annual Reports of the Brooklyn Park Commissioners 1861-1873</i> , at 136 (1873) (art. 1, § 4)	“All persons are forbidden ... [t]o carry firearms ... within [Prospect Park.]”	https://tinypurl.com/yv4v9a (Hathi Trust)
4	Philadelphia, PA	1868	1868 Pa. Laws 1088, No. 1020, § 21, pt. II	“No person shall carry fire arms ... in [Fairmount Park] or within fifty yards thereof[.]”	https://tinypurl.com/yu9v6re8 (HeinOnline)

	Location	Year	Citation	Key language	Link
5	San Francisco, CA	1872	Ordinance No. 2, <i>San Francisco Municipal Reports for the Fiscal Year 1874-75</i> , at 887 (1875) (§ 2, pt. 2)	“Within [Golden Gate and Buena Vista Parks] all persons are hereby forbidden: ... To carry ... firearms.”	https://tinyurl.com/5nZnfbnn (Google Books)
6	Chicago, IL	1873	<i>Laws and Ordinances Governing the City of Chicago</i> 88 (1873) (§ 6)	“All persons are forbidden to carry firearms ... within any one of the public parks.”	https://tinyurl.com/mPbxsertH (Google Books)
7	Buffalo, NY	1874	<i>Fourth Annual Report of the Buffalo Park Commissioners</i> 24 (1874) (ch. 1, § 1)	“All persons are forbidden to carry fire-arms ... within the several parks, approaches thereto or streets connecting the same.”	https://tinyurl.com/mr4dft99e (Hathi Trust)
8	Hyde Park, IL	1875	<i>Laws and Ordinances Governing the Village of Hyde Park</i> 310 (1876) (§ 6)	“All persons are forbidden to carry fire arms ... within [South Park].”	https://tinyurl.com/mvcwn5k9 (MoML)
9	Phoenixville, PA	1878	<i>A Digest of the Ordinances of Town Council of the Borough of Phoenixville</i> 135 (1906) (§ 4)	“No person shall carry fire-arms ... therein [Reeves Park].”	https://tinyurl.com/3vln8xx46 (Google Books)
10	Chicago, IL	1880	<i>The Municipal Code of Chicago: Comprising the Laws of Illinois Relating to the City of Chicago, and the Ordinances of the City Council</i> 391 (1881) (§ 1690)	“All persons are forbidden to carry firearms ... within any one of the public parks.”	https://tinyurl.com/7z5dbwnt (MoML)

	Location	Year	Citation	Key language	Link
11	St. Louis, MO	1881	<i>The Revised Ordinance of the City of St. Louis</i> 635 (1881) (§ 3)	“No person shall ... use or have in his possession ready for use in any street, alley, walk or park of the city of St. Louis ... any sling, cross bow and arrow, air gun or other contrivance for ejecting, discharging or throwing any fragment, bolt, arrow, pellet, or other missile[.]”	https://tinyurl.com/2azeb5fs (Hathi Trust)
12	Danville, IL	1883	<i>The Revised Ordinances of the City of Danville</i> 83 (1883) (§ 4)	“Whoever shall carry any fire-arms into said parks ... shall be fined not less than one dollar nor more than one hundred dollars, for each offense.”	https://tinyurl.com/2jd7cphz (MoML)
13	St. Louis, MO	1883	<i>Tower Grove Park of the City of St. Louis</i> 117 (1883) (§ 4)	“All persons are forbidden ... [t]o carry firearms[.]” (Tower Grove Park)	https://tinyurl.com/mrnx868s (Google Books)
14	Boston, MA	1886	<i>Thirteenth Annual Report of the Board of Commissioners for the Year 1887</i> , at 86 (1888) (§ 3)	“The Board of Park Commissioners of the City of Boston ... hereby ordains that within the Public Parks, except with the prior consent of the Board, it is forbidden: ... to carry fire-arms, except by members of the Police Force in the discharge of their duties[.]”	https://tinyurl.com/bdemeewm (Google Books)
15	Reading, PA	1887	<i>A Digest of the Laws and Ordinances for the Government of the Municipal Corporation of the City of Reading, Pennsylvania</i> 240 (1897) (§ 20, pt. 8)	“No person shall carry firearms ... in the common, or within fifty yards thereof[.]”	https://tinyurl.com/4kknzfff (Google Books)
16	Saint Paul, MN	1888	<i>Annual Reports of the City Officers and City Boards of the City of Saint Paul</i> 689 (1889) (§ 6)	“No person shall carry firearms ... in any Park or within fifty yards thereof[.]”	https://tinyurl.com/bdf5cmvv (Google Books)

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17	Salt Lake City, UT	1888	<i>The Revised Ordinances of Salt Lake City, with the City Charter and Amendments Thereto</i> 248 (1888) (§ 6)	“No person shall, within Liberty Park, ... [c]arry ... firearms.”	https://inyurl.com/2p82u82z (MoML)
18	Berlin, WI	1890	<i>The Municipal Code of Berlin, Comprising the Charter and the General Ordinances of the City</i> 76 (1890) (§ 263)	“All persons are forbidden to carry fire arms ... within anyone of the public parks of this City.”	https://inyurl.com/59psw2ck (Hathi Trust)
19	Trenton, NJ	1890	<i>City of Trenton, New Jersey, Charter and Ordinances</i> 390 (1903) (§ 8)	“No person shall carry firearms ... in said park or squares, or within fifty yards thereof[.]”	https://inyurl.com/yz22bkva (Google Books)
20	Williamsport, PA	1890	<i>Laws and Ordinances for the Government of the Municipal Corporation of the City of Williamsport, Pennsylvania</i> 141 (1891) (§ 1, pt. 21)	“No person shall carry fire-arms ... in [Brandon Park.]”	https://inyurl.com/239duswj (Google Books)
21	Grand Rapids, MI	1891	<i>Compiled Ordinances of the City of Grand Rapids</i> 163 (1906) (§ 432)	“No person shall ... carry any rifle, gun, or other fire arm of any kind within any park of the City of Grand Rapids[.]”	https://inyurl.com/3xau2k7w (MoML)
22	Milwaukee, WI	1891	<i>First Annual Report of the Park Commissioners of the City of Milwaukee</i> 32 (1892) (§ 3)	“All persons are forbidden to carry fire-arms ... within the parks.”	https://inyurl.com/3brhpbz3 (Hathi Trust)

	Location	Year	Citation	Key language	Link
23	Springfield, MA	1891	<i>Park Commissioners' Report, Springfield, Massachusetts</i> 82 (1897) (§ 3)	"[W]ithin the Public Parks, except with prior consent of the Board, it is forbidden ... to ... carry firearms[.]"	https://tinyurl.com/4rh66wk4 (Google Books)
24	Cincinnati, OH	1892	<i>Annual Report of the Board of Park Commissioners, for the Year Ending December 31, 1892, at 28</i> (1893) (§ 13)	"No person shall bring into ... the parks any firearms[.]"	https://tinyurl.com/bd4h7ud5 (Hathi Trust)
25	Lynn, MA	1892	<i>Third Annual Report of the Park Commissioners of the City of Lynn</i> 23 (1892) (§ 3)	"[W]ithin the limits of Lynn Woods, except with the prior consent of the Board, it is forbidden ... to ... carry firearms[.]"	https://tinyurl.com/575v78ms (Google Books)
26	Peoria, IL	1892	<i>Laws and Ordinances of the City of Peoria, Illinois</i> 667 (1892) (§ 1724)	"All persons are forbidden to carry fire arms ... within any of the public parks, public squares, or public grounds, within said city."	https://tinyurl.com/ypxz79zm (MoML)
27	Spokane, WA	1892	<i>The Municipal Code of the City of Spokane, Washington, Comprising the Ordinances of the City</i> 316 (1896) (§ 4)	"All persons are forbidden to carry firearms ... within any one of the public parks or other public grounds of the city."	https://tinyurl.com/sbwhmch5 (Google Books)
28	Pittsburgh, PA	1893	<i>A Digest of the Acts of Assembly Relating to, and the General Ordinances of the City of Pittsburgh</i> 496 (1897) (§ 5, pt. 3)	"No person shall be allowed to carry firearms ... within the limits of the parks or within one hundred yards thereof."	https://tinyurl.com/5d99zxca (Google Books)

	Location	Year	Citation	Key language	Link
29	Wilmington, DE	1893	<i>The Charter of the City of Wilmington</i> 571 (1893) (pt. VII, § 7)	“No person shall carry fire-arms ... within the Park[.]”	https://inyurl.com/2p8mb99f (Google Books)
30	Saint Paul, MN	1894	<i>General Ordinances and Private Ordinances of a Public Nature of the City of St. Paul, Ramsey County, Minnesota, Up to and Including December 31 st, 1895, at 208</i> (1896) (pt. 6)	“No person shall carry firearms... in any park, or within fifty (50) yards thereof[.]”	https://inyurl.com/u7isn4hp (MoML)
31	Canton, IL	1895	<i>Revised Ordinances of the City of Canton, Illinois</i> 240 (1895) (§ 26)	“All persons are forbidden to carry firearms ... within any one of these Public Parks.”	https://inyurl.com/2h6yxtki (MoML)
32	Detroit, MI	1895	1895 Mich. Local Acts 596, § 44	“No person shall ... carry firearms ... within said park or boulevard[.]”	https://inyurl.com/2ix7dhan (HeinOnline)
33	Centralia, IL	1896	<i>The Centralia City Code: Comprising Original Charter and Amendments, the Laws of the State of Illinois Relating to the Government of the City of Centralia, General Ordinances, Special Ordinances and Illinois Central Railroad Contract</i> 188 (1896) (ch. 33, § 3)	“All persons are forbidden to carry firearms ... in [Centralia’s Central Park].”	https://inyurl.com/4h3k3r6i (Hathi Trust)

	Location	Year	Citation	Key language	Link
34	Indianapolis, IN	1896	<i>The General Ordinances of the City of Indianapolis</i> 648 (1904) (§ 1971)	“No person shall ... have possession of any fire-arm within the limits of any public park.”	https://tinyurl.com/2hZek5jm (MoML)
35	Rochester, NY	1896	<i>Report of the Board of Park Commissioners of the City of Rochester, N.Y., 1888 to 1898, at 97-98</i> (1898) (§ 4, pt. 25)	“No person shall commit any of the following acts within said parks without the consent of said Board, or some duly authorized person ... Carry any ... firearm, sling-shot, axe, saw, shovel or spade within the following parks, viz.: Genesee Valley Park, Highland Park, Seneca Park east and Seneca Park west.”	https://tinyurl.com/4rm8jmkd (Google Books)
36	Wilmington, DE	1897	<i>Report of the Board of Park Commissioners, of Wilmington, Del. for the Year ending December 31st, 1897, at 24</i> (1898)	“No person shall carry firearms ... within the boundaries of the Park.”	https://tinyurl.com/2ezentmc (Google Books)
37	Kansas City, MO	1898	Ordinance No. 9637, <i>Charter and Revised Ordinances of Kansas City 1898, at 657</i> (1898) (§ 11)	“No person shall ... carry fire-arms ... within any park, boulevard, parkway or driveway of this city under the control or supervision of the board of park commissioners, except upon a permit first duly obtained or authority previously granted by said board[.]?”	https://tinyurl.com/47wuw6nf (Google Books)
38	New Haven, CT	1898	<i>Charter and Ordinances of the City of New Haven, Together with Legislative Acts Affecting Said City</i> 293 (1898) (§ 3)	“No person shall carry or have any fire-arms on any of said parks[.]?”	https://tinyurl.com/nccb32m6 (Google Books)
39	Boulder, CO	1899	<i>Revised Ordinances of the City of Boulder</i> 157	“Any person other than the police officers of the city who shall take or carry or cause to be taken	https://tinyurl.com/3vbnzdp

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			(1899) (ch. XVIII, No. 511, § 1)	or carried into any of the parks belonging to the City of Boulder, any gun, pistol, revolver, or other firearm, ... shall be deemed guilty of a misdemeanor.”	(MoML)
40	Minnesota	1901	1901 Minn. Laws 396-97, ch. 250, § 1	“Any person who shall ... in any manner whatsoever ... have in their possession loaded or charged firearms at any point within three thousand (3,000) feet of the outward limits of, or proposed outward boundary line or limits of any ... state park within this state, shall be guilty of a misdemeanor[.]”	https://tinyurl.com/4fv7993 (HeinOnline)
41	Hartford, CT	1902	<i>Municipal Register of the City of Hartford</i> 493 (1907) (pt. 9)	“The Board of Park Commissioners ... hereby make and ordain the following rules and regulations for the management of the parks owned by or under control of the city of Hartford. ... It is forbidden ... [t]o ... carry firearms[.]”	https://tinyurl.com/2p8k37mc (MoML)
42	New Bedford, MA	1902	<i>Ninth Annual Report of the Department of Parks of the City of New Bedford, Mass.</i> 1902, at 74 (1903) (§ 3)	“[W]ithin the public parks and commons of the city, except with prior consent of the Commissioners, all persons are hereby forbidden ... to ... carry firearms[.]”	https://tinyurl.com/5n8dpxfh (Hathi Trust)
43	Springfield, IL	1902	<i>First Annual Report of the Board of Trustees of the Pleasure Driveway and Park District of Springfield, Illinois</i> 69 (1902) (§ 3, pt. 4)	“ALL PERSONS ARE FORBIDDEN: ... [t]o carry ... firearms ... in the parks[.]”	https://tinyurl.com/fvc2hpd7 (Google Books)
44	Lowell, MA	1903	<i>First Annual Report of the Board of Park Commissioners of the</i>	“[W]ithin [the] Public Parks and Commons, except by and with the consent of the Board ... [i]t is forbidden to ... carry firearms[.]”	https://tinyurl.com/mr2kh885 (Hathi Trust)

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			<i>City of Lowell 58</i> (1904) (§ 3)		
45	New York City, NY	1903	<i>IV Proceedings of the Board of Aldermen of the City of New York from October 6 to December 28, 1903</i> , at 600 (1903) (§ 24)	“No one shall ... carry any firearm, fire cracker, torpedo or fire-works ... within any of the parks, parkways, squares or places in The City of New York under the jurisdiction of the Department of Parks without special permission from the Commissioner having jurisdiction.”	https://tinyurl.com/ihw95eu3 (Hathi Trust)
46	Pasadena, CA	1903	Ordinance No. 539, III <i>Ordinances of the City of Pasadena California 29</i> (1912) (§ 1, pt. 2)	“It is hereby declared to be unlawful for any person or persons to do any of the acts hereinafter specified within the limits of any of said public parks ... [t]o carry ... any firearms[.]”	https://tinyurl.com/djb6d5bz (Google Books)
47	Troy, NY	1903	<i>Municipal Ordinances of the City of Troy 375</i> (1905)	“All persons are forbidden ... [t]o carry ... firearms ... in the parks.”	https://tinyurl.com/mt2w8amx (MoML)
48	Houston, TX	1904	<i>Charter and Revised Code of Ordinances of the City of Houston, Harris County, Texas 358-59</i> (1904) (art. 918, pt. 3; art. 921)	“It shall be unlawful for any person or persons within the public park and commons of this city to ... carry firearms[.]”	https://tinyurl.com/5b6k2rsp (MoML)
49	Neleigh, NE	1904	<i>The Ordinances of the City of Neligh, Nebraska 37</i> (1906) (No. 61, § 1)	“[I]f any person shall carry ... any firearm or gun of any description in any public park belonging to the city of Neligh, such person shall on conviction thereof, be fined in any sum not exceeding \$25.”	https://tinyurl.com/bdethit2 (MoML)
50	Pueblo, CO	1904	<i>Ordinances of the City of Pueblo 383-86</i> (1908) (No. 678, pt. 20)	“[F]or the purpose of governing and regulating the use of the parks and of park property within the city of Pueblo, the following rules ... are ... adopted ... 20. No person shall ... carry firearms[.]”	https://tinyurl.com/mry6bb6ww (MoML)

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51	Harrisburg, PA	1905	<i>A Digest of the Laws and Ordinances for the Government of the Municipal Corporation of the City of Harrisburg, Pennsylvania</i> 468 (1906) (§§ 4, 8)	“No person shall commit any of the following acts within said park or parkways, without the previously obtained consent of the commission: ... 4. [c]arry ... any firearms ... 8. [c]arry any ... firearms ... within reservoir park.”	https://tinyurl.com/54t7yeey (MoML)
52	Haverhill, MA	1905	<i>Annual Report of the Park Commissioners of the City of Haverhill, Massachusetts</i> 12 (1906) (§ 9)	“It is forbidden ... to ... carry firearms ... within the parks.”	https://tinyurl.com/2a67tkbey (Google Books)
53	Minnesota	1905	1905 Minn. Laws 620, ch. 344, § 53	“No person shall have in his possession within any [territory set apart, designated, used or maintained as a state public park or within one-half mile of the outer limits thereof, any gun, revolver, or other firearm unless the same is unloaded, and except after the same has been sealed by the park commissioner or a deputy appointed by him, and except also such gun or other firearm at all times during which it may be lawfully had in such park remains so sealed and unloaded.”	https://tinyurl.com/2p99pck8 (HeinOnline)
54	Saginaw, MI	1905	<i>Charter of the City of Saginaw, Michigan</i> 173 (1905) (§ 22)	“No person shall ... carry firearms ... within park boulevards, nor shall any person fire, discharge or set off any rocket, cracker, torpedo, squib or other fireworks, or things containing any substance of any explosive character on said park or boulevard without the consent of said commissioners, and then only under such regulations as they shall prescribe.”	https://tinyurl.com/ypb5tted (MoML)

	Location	Year	Citation	Key language	Link
55	Chicago, IL	1906	<i>Amendments to "The Revised Municipal Code of Chicago of 1905" and New General Ordinances</i> 40 (1906) (§ 1562)	"All persons are forbidden to carry firearms ... within any of the Parks, Public Play Grounds or Bathing Beaches of the City[.]"	https://tinyurl.com/ye2advdr (Hathi Trust)
56	Denver, CO	1906	<i>The Municipal Code of the City and County of Denver</i> 479 (1906) (§ 1367)	"All persons are forbidden ... to carry ... firearms ... in the parks[.]"	https://tinyurl.com/yuhcpzv8 (MoML)
57	Los Angeles, CA	1906	<i>Penal Ordinances of the City of Los Angeles</i> 41-42 (1922) (§§ 1, 2, pt. 2)	"1. That the rules and regulations hereinafter prescribed shall govern the public parks of the City of Los Angeles. 2. That within the limits of any of said parks, it shall be unlawful for any person or persons to do any of the acts hereinafter specified, to-wit: ... To carry ... any fire arms, ... or air gun or slungshot."	https://tinyurl.com/2ubpft4y (MoML)
58	District of Columbia	1907	<i>1 Annual Report of the Commissioners of the District of Columbia Year Ended June 30, 1908</i> , at 85 (1908) (§ 4)	"Within the limits of [Rock Creek Park] all persons are forbidden ... [t]o carry ... firearms[.]"	https://tinyurl.com/2p9b2hbx (Google Books)
59	Oil City, PA	1907	<i>A Digest of the Ordinances and Principal Resolutions for the Government of the City of Oil City, in Venango County, Pennsylvania, in Force January 1st, 1907</i> , at 121 (§ 1, pt. 4)	"[T]he following rules and regulations shall be and are hereby established for the management and protection of the parks and public grounds of the City of Oil City, to wit: ... No person shall be allowed to carry firearms ... within the limits of the park."	https://tinyurl.com/5w25tcxy (Google Books)

	Location	Year	Citation	Key language	Link
60	Olean, NY	1907	<i>Ordinances of the City of Olean as Amended to September 1922</i> , at 26 (1922) (§ 4)	“No person shall ... carry any firearms in any park.”	https://tinyurl.com/murvjannw (MoML)
61	Seattle, WA	1907	<i>The Charter of the City of Seattle</i> 221 (1908) (§ 100)	“It shall be unlawful ... to carry any fire-arm in any park.”	https://tinyurl.com/mr4564em (MoML)
62	Kansas City, MO	1909	<i>Charter and Revised Ordinances of Kansas City 1909</i> , at 846 (1909) (§ 1048)	“No person shall ... carry fire-arms ... within any park, boulevard, avenue, street, parkway, or driveway of this city under the control or supervision of the Board of Park Commissioners, except upon a permit first duly obtained or authority previously granted by said Board and subject to such rules and regulations as said Board may establish.”	https://tinyurl.com/rxnjflw5 (MoML)
63	Memphis, TN	1909	<i>A Digest of the Laws, Ordinances and Contracts of the City of Memphis</i> 657-59 (1909) (§ 1131, pt. 13)	“[I]t shall be a misdemeanor ... to commit the following acts ... 13. To ... carry any firearms ... within any of the parks, parkways, squares or places without special permission from the Commissioners.”	https://tinyurl.com/2abcx7bc (MoML)
64	Oakland, CA	1909	Ordinance No. 2967, <i>General Municipal Ordinances of the City of Oakland, Cal.</i> , Addenda at 15 (1909) (§ 9)	“No person shall carry firearms ... within the boundaries of the parks controlled by the Park Commission.”	https://tinyurl.com/mphdrwda (Hathi Trust)
65	Paducah, KY	1909	<i>Constitution, Charter and Revision of the Ordinances and Municipal Laws of the City of Paducah</i> ,	“No person shall ... carry fire-arms ... within any park, boulevard, avenue, street, parkway or driveway of this city under the control or supervision of the Board of Park Commissioners, except upon a permit first duly obtained or authority previously granted by said board[.]”	https://tinyurl.com/5dze9mj2 (MoML)

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			<i>Kentucky</i> 489 (1910) (§ 20)		
66	Jacksonville, IL	1910	<i>Ordinances Governing the City of Jacksonville of the State of Illinois</i> 113 (1910) (art. II, § 3)	“No person shall carry any firearms ... within any of said parks.”	https://tinyurl.com/575mpur (Google Books)
67	Staunton, VA	1910	<i>The Code of the City of Staunton, Virginia</i> 115 (1910) (§ 135)	“All persons are forbidden ... to carry firearms ... within [the park.]”	https://tinyurl.com/ysz25b5p (Hathi Trust)
68	Colorado Springs, CO	1911	<i>The Code of Colorado Springs, 1922</i> , at 450 (1922) (§ 1068)	“All persons are forbidden ... to carry ... firearms ... in the parks[.]”	https://tinyurl.com/5f6rppv (MoML)
69	New York City, NY	1912	<i>New Code of Ordinances of the City of New York</i> 389 (1926) (§ 17, pt. 8)	“No person shall, in any park: ... carry any firearm[.]”	https://tinyurl.com/yez5hd94 (MoML)
70	Oakland, CA	1912	<i>City of Oakland General Municipal Ordinances In effect January 1, 1918</i> , at 119 (1918) (§ 9)	“No person shall carry firearms ... within the boundaries of the parks controlled by the Board of Park Directors.”	https://tinyurl.com/v9w2hkef (MoML)
71	Grand Rapids, MI	1914	<i>Compiled Ordinances of the City of Grand Rapids</i> 208 (1915) (§ 556, pt. e)	“No person shall carry any rifle, gun, or other fire-arm of any kind within the parks and playgrounds of the City of Grand Rapids[.]”	https://tinyurl.com/djb6d5bz (MoML)
72	New Haven, CT	1914	<i>Charter and Ordinances of the City of New Haven, Conn. and Special Acts Revised to January, 1914</i> , at 438 (1914) (§ 3)	“No person shall carry or have any firearms on any of said parks[.]”	https://tinyurl.com/intwbink (MoML)

	Location	Year	Citation	Key language	Link
73	New York City, NY	1916	<i>Ordinances, Rules and Regulations of the Department of Parks of the City of New York</i> 7 (1916) (§ 17, pt. 8)	“No person shall, in any park ... carry any firearm[.]”	https://tinyurl.com/3nwb8e1w (Hathi Trust)
74	Birmingham, AL	1917	<i>The Code of City of Birmingham, Alabama</i> 662 (1917) (§ 1544)	“[N]o person shall carry firearms ... within any of such public parks[.]”	https://tinyurl.com/2xdkp689 (Google Books)
75	Joplin, MO	1917	<i>The Joplin Code of 1917</i> , at 552 (1917) (§ 1214)	“All persons are forbidden ... to carry ... firearms ... in the parks[.]”	https://tinyurl.com/5n63f666 (MoML)
76	Maryland	1917	<i>Report of the Maryland State Board of Forestry for 1916 and 1917</i> , at 60-61 (1917) (pt. 4)	“RULES AND REGULATIONS OF THE MARYLAND STATE BOARD OF FORESTRY ... [U]ses like camping require a permit; permittees and their guests] ... [w]ill not bring into the Patapsco State Park or have in his or their possession while there fire-arms of any description[.]”	https://tinyurl.com/4tvv4dup (Hathi Trust)
77	Wisconsin	1917	<i>1917 Wis. Sess. Laws</i> 1243-44, ch. 668, § 3 (29.57), pt. 4	[Within sign to be posted in Patapsco State Park:] “FIREARMS PROHIBITED” “No owner of lands embraced within any such wild life refuge, and no other person whatever, shall ... within the boundaries of any wild life refuge, state park, or state fish hatchery lands ... have in his possession or under his control therein any gun or rifle, unless the same is unloaded and knocked down or enclosed within its carrying case[.]”	https://tinyurl.com/2e22e2ch (HeinOnline)
78	Connecticut	1918	<i>Report of the State Park Commission to the Governor For the Two Fiscal Years</i>	“The use of firearms or having them in possession is forbidden [in Connecticut State Parks.]”	https://tinyurl.com/mu9979dm (Hathi Trust)

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			<i>ended September 30, 1918, at 31 (1918)</i>		
79	Salt Lake City, UT	1920	<i>Revised Ordinances of Salt Lake City, Utah, 1920, at 474 (1920) (§ 1494, pt. 2)</i>	“It shall be unlawful for any person to do ... any of the acts hereinafter specified in any public park or play ground in Salt Lake City, or in any place ... set aside or used as a public park or play ground, to wit: ... 2. To carry ... any firearms[.]”	https://tinyurl.com/3d3ixx3n (MoML)
80	Burlington, VT	1921	<i>Revised Ordinances of 1921, City of Burlington, Vermont 1 (1921) (§ 3)</i>	“No person shall carry or have any firearms on any of said parks[.]”	https://tinyurl.com/2fk58a7k (MoML)
81	North Carolina	1921	1921 N.C. Sess. Laws 54, Pub. Laws Extra Sess., ch. 6, § 3	“That any person who shall carry a pistol, revolver, or gun in any park or reservation [for the protection, breeding, or keeping of any animals, game, or other birds], without having first obtained the written permission of the owner or manager of said park or reservation, shall be guilty of a misdemeanor[.]”	https://tinyurl.com/yx3bz5tk (HeinOnline)
82	Chattanooga, TN	1922	<i>Digest of the Charter and Ordinances of the City of Chattanooga 144-45 (1922) (§ 516)</i>	“GENERAL REGULATIONS OF PUBLIC PARKS ... 516. ... It shall be unlawful to ... carry firearms[.]”	https://tinyurl.com/5xcca4p (MoML)
83	Chicago, IL	1922	<i>The Chicago Municipal Code of 1922, at 809 (1922) (§ 2870)</i>	“All persons are forbidden to carry firearms ... within any of the parks, public playgrounds, or bathing beaches of the city[.]”	https://tinyurl.com/4kk8w2yr (Google Books)
84	Washington	1926	Raymond H. Torrey, <i>State Parks and Recreational Uses of State Forests in the United States 247 (1926)</i>	“Among the regulations [of Washington State Parks] which experience has required for conservation, sanitation, cleanliness and good order are prohibitions against fire arms[.]”	https://tinyurl.com/498zu75s (Hathi Trust)

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85	Indiana	1927	1927 Ind. Acts 98	“[U]pon any lands of this state now or hereafter used for a state park or for a state forest reserve ... it shall be unlawful for any person to go upon such lands of this state with a gun[.]”	https://tinyurl.com/5ycezb59 (HeinOnline)
86	Indiana	1927	<i>The Department of Conservation State of Indiana Publication No. 68, at 181 (1927) (§ 354, pt. 2)</i>	“The carrying or possession of a gun or firearms is prohibited.”	https://tinyurl.com/ep7bjj6w (Google Books)
87	Maryland	1927	1927 Md. Laws 1176, ch. 568, § 74	“Where any portion of a State Game Refuge is used for a State Park, entry by any person within the refuge area for recreational pursuits shall not be restricted on the portion of said territory used as a State Park, so long as such persons do not carry fire-arms[.]”	https://tinyurl.com/2te8du8b (HeinOnline)
88	South Dakota	1927	1927 S.D. Sess. Laws 32, ch.12, § 16	“It shall be unlawful to carry fire arms in [Custer State Park], except by duly authorized officers[.]”	https://tinyurl.com/4k859sbn (HeinOnline)
89	Michigan	1928	<i>Fourth Biennial Report 1927-1928: The Department of Conservation State of Michigan 57 (1928) (§ 2)</i>	“To carry or have firearms in possession in a State Park is unlawful.”	https://tinyurl.com/5n8h547e (Hathi Trust)
90	Washington	1928	Beatrice Ward Nelson, <i>State Recreation; Parks, Forests and Game Preserves 278 (1928)</i>	“The caretakers of the park, and other employees whom the committee may care to designate, are vested with police powers to enforce the laws and the rules and regulations. Among the regulations are the prohibition of firearms[.]”	https://tinyurl.com/yn8ftdb8 (Hathi Trust)
91	Kansas	1930	<i>Third Biennial Report of the Forestry, Fish and Game Commission</i>	“To carry or have firearms in possession in a state park is unlawful.”	https://tinyurl.com/4zw74f4e (Hathi Trust)

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			<i>of the State of Kansas for the Period Ending June 30, 1930, at 23 (1930) (§ 2)</i>		
92	Wisconsin	1933	<i>Wisconsin State Parks 23 (1933) (§ 6)</i>	“[T]he carrying or using of firearms is strictly prohibited.”	https://inyurl.com/bd#2nf7 (Hathi Trust)
93	New Jersey	1935	1935 N.J. Laws 304-05, ch. 114, § 2	“No person shall ... (8) except employees or officers of the commissioners, carry firearms of any description within [Palisades State Park], or carry any airgun, sling shot, bow and arrow, or any other device whereby a missile may be thrown, without a permit from the commissioners[.]”	https://inyurl.com/4u8cxky (Hathi Trust)
94	Alabama	1936	<i>I Digest of Laws Relating to State Parks 4 (1936) (§ 8)</i>	“Fire-arms are rigidly excluded from State Parks[.]”	https://inyurl.com/4j25uu5a (Hathi Trust)
95	California	1936	<i>I Digest of Laws Relating to State Parks 20 (1936)</i>	“Firearms are not allowed, and must be sealed or checked at the Warden’s Office.”	https://inyurl.com/4jds7v6d (Hathi Trust)
96	Florida	1936	<i>I Digest of Laws Relating to State Parks 35 (1936) (§ 4)</i>	“Firearms are prohibited within the Park except upon written permission of the Superintendent.”	https://inyurl.com/h6aj47pd (Hathi Trust)
97	New York	1936	<i>II Digest of Laws Relating to State Parks 190 (1936) (§ 8)</i>	“The following acts and activities are prohibited within [Niagara Frontier State Park] areas under jurisdiction of this Commission except by permit:- The possession of any firearms ... of any kind[.]”	https://inyurl.com/7mnu2ep99 (Hathi Trust)
98	New York	1936	<i>Id.</i> at 195 (§ 6)	“No firearms may be used or possessed within [Allegany State Park] area by visitors ... except by special permission of the Commissioners.”	https://inyurl.com/3my6jdr6 (Hathi Trust)

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99	New York	1936	<i>Id.</i> at 201 (§ 5)	“No person shall carry or have in his possession any gun, firearms, ammunition, or explosives ... within or from the park areas [of Finger Lakes State Parks] except when especially authorized by the Commission to do so.”	https://inyurl.com/hv6aw2e6 (Hathi Trust)
100	New York	1936	<i>Id.</i> at 205 (§ 3)	“No person except employees or officers of the Commission shall carry firearms of any description within [Central New York State Parks].”	https://inyurl.com/frkw396u (Hathi Trust)
101	New York	1936	<i>Id.</i> at 221 (§ 3)	“No person except employees or officers of the Commission shall carry firearms of any description within [Taconic State Park].”	https://inyurl.com/bdir2xje (Hathi Trust)
102	New York	1936	<i>Id.</i> at 228 (§ 8)	“No person, except employees or officers of the Commissioners, shall carry firearms of any description within [Palisades Interstate Park]. No unauthorized person shall carry any airgun, sling shot, bow and arrow, or any other device whereby a missile may be thrown.”	https://inyurl.com/4ix9h7ax (Hathi Trust)
103	New York	1936	<i>Id.</i> at 236 (§ 15)	“No person shall have or carry while in any park [of the Westchester County Park System] whether concealed or not concealed on his person, any pistol, gun, rifle, revolver or other firearms of any class or kind, or any ammunition therefor, except when so authorized by law.”	https://inyurl.com/39rm7jkh (Hathi Trust)
104	New York	1936	<i>Id.</i> at 255 (§ 7)	“No person shall have or carry, whether or not concealed upon his person, any pistol or revolver ... or ammunition therefor, except when so authorized by law. No person shall bring into any park [under the jurisdiction of the Long Island State Park Commission], or have in his possession therein, any rifle, shotgun, or fowling piece[.]”	https://inyurl.com/y2rv4exu (Hathi Trust)

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105	New York	1936	<i>Id.</i> at 264 (No. 3)	“No person shall carry or have in his possession any gun, firearms, ammunition or explosives ... within or from the park area [of Thousand Island State Park] except when especially authorized by the Commission to do so.”	https://tinyurl.com/bdecd2ma (Hathi Trust)
106	North Carolina	1936	II <i>Digest of Laws Relating to State Parks</i> 284 (1936)	“Nor may any person carry a pistol, revolver or gun in any such park or reservation without first having obtained written permission to do so.”	https://tinyurl.com/284bdku7 (Hathi)
107	Ohio	1936	III <i>Digest of Laws Relating to State Parks</i> 321 (1936) (§ 5)	“[T]he carrying of firearms, loaded or unloaded, in any state park under the control of the Ohio State Archaeological and Historical Society, is positively forbidden.”	https://tinyurl.com/bdeym2ic (Hathi Trust)
108	Rhode Island	1936	III <i>Digest of Laws Relating to State Parks</i> 360 (1936) (§ 2)	“REPRESENTATIVE RULES AND REGULATIONS [of the Division of Forests, Parks & Parkways] ... No person shall ... have in his possession any firearm[.]”	https://tinyurl.com/yhchv3kd (Hathi Trust)
109	Virginia	1936	III <i>Digest of Laws Relating to State Parks</i> 396 (1936) (§ 6) <i>Id.</i> at 397	“EXCERPTS FROM REGULATIONS GOVERNING PARK PERSONNEL ... The carrying and use of fire arms is prohibited.” “INSTRUCTIONS TO PARK VISITORS ... Firearms are prohibited at all times.”	https://tinyurl.com/37e2y86y (Hathi Trust)
110	California	1938	<i>Administration and Maintenance of Parks: California State Park System</i> (1938) (§ 7)	“No person shall carry or have firearms in any state park[.]”	Copy obtained from the California State Library
111	California	1939	<i>Annual Report of the State Park Commission</i> (1939) (§ 7)	“No person shall carry or have firearms in any state park[.]”	Copy obtained from the California State Library
112	Mississippi	1939	<i>Seventh Biennial Report of The Mississippi Forestry Commission and The</i>	“Firearms of any kind will not be permitted within a park except when carried by a lawful officer.”	https://tinyurl.com/39r6aktid (Hathi Trust)

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			<i>First Biennial Report of The Mississippi State Board of Park Supervisors</i> 105 (1939) (§ 8)		
113	California	1940	<i>Rules and Regulations of the California State Park System</i> (1940) (§ 7)	“No person shall carry or have firearms in any State Park[.]”	Copy obtained from the California State Library
114	Federal	1882	Dwight H. Kelton, <i>Annals of Fort Mackinac</i> 22 (1882) (pt. IX)	“The following are the approved Rules and Regulations for the Park at Mackinac: ... No person shall carry ... fire-arms in the park.”	https://tinyurl.com/4kxnkra9 (Hathi Trust)
115	Federal	1890	Department of the Interior, “Rules and Regulations of the Sequoia National Park” § 5, Oct. 21, 1890, <i>reprinted in Annual Report of the Secretary of the Interior</i> CLXII (Nov. 1, 1890)	“[N]o one shall carry into or have in the park any fire-arms, traps, nets, tackle, or appliances, or fish or hunt therein without a license in writing signed by the Secretary or superintendent of the park.”	https://tinyurl.com/5e96ayma (HeinOnline)
116	Federal	1894	Department of the Interior, “Rules and Regulations of the Yellowstone National Park” § 5, Aug. 1, 1894, <i>reprinted in Report of the Secretary of the Interior</i> 662 (1894)	“Firearms will only be permitted in the park on written permission of the superintendent thereof. On arrival at the first station of the park guard, parties having firearms will turn them over to the sergeant in charge of the station, taking his receipt for them. They will be returned to the owners on leaving the park.”	https://tinyurl.com/2t578tax (HeinOnline)

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117	Federal	1897-1936	“Firearms Regulations in the National Parks, 1897–1936” (2008)		https://perma.cc/5SRK-VYXZ (National Park Service History eLibrary)
118	Federal	1936	1 Fed. Reg. 668, 674 (June 27, 1936)	“Firearms ... are prohibited within the parks and monuments, except upon written permission of the superintendent or custodian.”	(Previously on NPS website, <i>see</i> [archive.org]) https://inurl.com/8yfe879p (Library of Congress)