

ALAN BECK (HI Bar No. 9145)
Attorney at Law
2692 Harcourt Drive
San Diego, California 92123
Telephone: (619) 905-9105
Email: alan.alexander.beck@gmail.com

STEPHEN D. STAMBOULIEH
STAMBOULIEH LAW, PLLC
P.O. Box 4008
Madison, MS 39130
Telephone: (601) 852-3440
Email: stephen@sdslaw.us

**UNITED STATE COURT OF APPEALS
NINTH CIRCUIT**

GEORGE K. YOUNG JR,)	
)	
Plaintiff,)	No. 12-17808
vs.)	
)	CASE No. 1200336 HG BMK
STATE OF HAWAII ET. AL.)	
)	NOTICE OF SUPPLEMENTAL
Defendants.)	AUTHORITY

Notice of Supplemental Authority

Mr. Young writes the Court to inform it of the D.C. Circuit’s recent decision in *BRIAN WRENN, ET AL., APPELLANTS v. DISTRICT OF COLUMBIA, ET AL., APPELLEES MATTHEW GRACE AND PINK PISTOLS, APPELLEES*, 16-7025, 2017 WL 3138111 (D.C. Cir. July 25, 2017) (attached). There, the D.C. Court of Appeals struck down Washington D.C.’s restriction on concealed carry that required the litigant to demonstrate that he show a good cause for carrying a

concealed handgun. The Court reasoned that while concealed carry alone may have been outside the historical right, the Second Amendment requires that the government allow some means to carry either concealed or openly. This supports Mr. Young's challenge to Hawaii's handgun carry laws because he wishes to carry a handgun either openly or concealed. And in Hawaii open carry is banned by law and in practice the County of Hawaii does not issue concealed carry permits which results in a de facto ban of concealed carry. Thus, handgun carry is in practice entirely banned. This, per the D.C. Circuit's reasoning, is unconstitutional.

The D.C. Circuit has joined the 7th Circuit in finding that the government is required to allow some form of handgun carry. Unlike the litigants in *Peruta v. Cty. of San Diego*, 824 F.3d 919, 927 (9th Cir. 2016) (en banc), Mr. Young did not ask for a concealed carry permit alone. Rather he asked for a permit to carry either openly or concealed. Thus, he is entitled to relief based on the D.C. Circuit reasoning. Mr. Young strongly urges this Court to adopt the D.C. Circuit's insightful analysis when evaluating his claims.

Respectfully submitted this 25th day of July 2017

s/ Alan Beck
Alan Beck (HI Bar No. 9145)

CERTIFICATE OF SERVICE

On this, the 25th day of July, 2017, I served the foregoing pleading by electronically filing it with the Court's CM/ECF system which generated a Notice of Filing and effects service upon counsel for all parties in the case. I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 25th day of July, 2017

s/ Alan Beck