



# Northwest School of Safety

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J \_\_\_\_\_  
Senior Deputy Prosecuting Attorney  
Grays Harbor County  
102 West Broadway, Room 102  
Montesano, WA 98563

November 10, 2014

Dear M \_\_\_\_\_,

My name is Monica Cowles, owner of Northwest School of Safety, where, in addition to crime prevention and personal safety strategies, I also teach women's firearm safety courses. Women are the fastest growing demographic of gun owners in America. In Washington State alone, there are currently over 100,000 women who are licensed to carry a concealed pistol. However, simply owning a gun does not make women, or men, for that matter, safe. One must know and practice handling a firearm safely as well as take precautions that keep those firearms out of the hands of unauthorized and dangerous individuals. It is also important to know when we have the legal right to use a firearm in self defense (as you well know, it's not as cut and dried as many believe).

I am writing you concerning the recent passage of Initiative 594 for clarification as to how it will affect my small training business. I found, from my untrained reading, the wording to be rather broadly written with narrow exceptions. The points I am particularly concerned about are;

*(25) "Transfer" means the intended delivery of a firearm to another person without consideration of payment or promise of payment including, but not limited to, gifts and loans.*

During the course of firearm safety instruction, a firearm may be transferred between instructor and student many times for the purpose of instruction, demonstration, maintenance, malfunction clearing, repair or for immediate and urgent safety reasons. I would like to know if "transfer", as defined above, would apply in those cases. If it does, it will obviously severely affect my business practices and procedures.

Furthermore, the wording of the narrow exception in Section 3(4) is rather confusing to a layman's interpretation;

*(ii) if the temporary transfer occurs, and the firearm is kept at all times, at an established shooting range authorized by the governing body of the jurisdiction in which such range is located;*

I teach a classroom only foundational firearm safety course in my home, where unloaded firearms are utilized for the purpose of hands-on demonstration and learning. These handguns are either provided by me or my students bring their own. Thus, the "temporary transferring" between instructor and student takes place *not* at an established shooting range. Is this important safety instruction now against the law because my home is not compliant with this section?

Additionally, I will be doing my live fire instruction at one of two established shooting ranges in our local area; The Grays Harbor Rifle and Pistol Club, or the Willapa Harbor Gun Club. How is the "authorization by the governing body of the jurisdiction in which those ranges are located" to be determined, and how can I, as a firearms instructor, ensure that I am complying with this portion of the law?

I am very alarmed and concerned about how this initiative will affect firearm safety training, which is the most vital focus of Northwest School of Safety. It will be a great disappointment if my small business ends up being a casualty of this law, rather than the criminals it purports to be aimed at.

I look forward to hearing from you as soon as possible on this matter.

Warm regards,

Monica Cowles, Owner  
Northwest School of Safety