

**NATIONAL SHOOTING SPORTS FOUNDATION, INC.**11 Mile Hill Road • Newtown, CT 06470-2359 • Tel (203) 426-1320 • Fax (203) 426-7182 • www.nssf.org

LAWRENCE G. KEANE
SENIOR VICE PRESIDENT
& GENERAL COUNSEL

January 28, 2015

President Michael Sutton
Commissioners Baylis, Kellogg, Rogers,
and Hostler-Carmesin
California Fish and Game Commission
1416 Ninth Street, Suite 1320
Sacramento, CA 95814

Re: Commissioner Sutton's Recusal on AB 711 Implementation Regulations

Dear President Sutton and Commissioners:

The National Shooting Sports Foundation ("NSSF") is the trade association for America's firearms, ammunition, hunting, and recreational shooting sports industry. Its mission is to promote, protect and preserve hunting and the shooting sports. NSSF has a membership of more than 12,000 manufacturers, distributors, firearms retailers, shooting ranges, and sportsmen's organizations. Our manufacturer members make the firearms used by law-abiding California sportsmen, the U.S. military and law enforcement agencies throughout the state.

We would like to take this opportunity to remind you that NSSF still has serious concerns about the apparent conflict of interest of Commission President Michael Sutton relative to the alternative ammunition issue. On October 8, 2014, NSSF delivered the letter to Mr. Sutton asking that he recuse himself from involvement in the drafting of regulations to implement AB 711, as well as any other issue related to lead ammunition or matters lobbied by Audubon California or Pacific Flyway. Because of Mr. Sutton's positions as Executive Director of Audubon California and Vice President of Pacific Flyway, his involvement in the implementation of AB 711 regulations appears to violate state statutes and undermines public confidence in the commission's impartiality and fairness in the regulatory process.

During a meeting of the Commission on December 3, 2014, Mr. Sutton chaired the entire meeting, even during the discussions relating to the implementation of AB 711. It was only during the vote that Mr. Sutton chose to abstain. By chairing the discussion concerning the use of lead ammunition, Mr. Sutton has chosen not to recuse himself, therefore, still directly involved in an issue in which he has a serious conflict of interest.

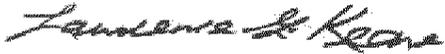
Until the matter of Mr. Sutton's involvement in the alternative ammunition issue is resolved, NSSF does not have confidence that manufacturers, dealers or sportsmen can receive fair and

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impartial treatment in this subject area from the commission including the current drafting of regulations.

Again we respectfully request that President Sutton recuse himself from any involvement in the implementation regulations for AB 711. Thank you for your thorough examination of the concerns set forth in this letter.

Sincerely,



Lawrence G Keane
Senior Vice President & General Counsel
National Shooting Sports Foundation

cc: Governor Edmund G. Brown, Jr.
Ms. Nettie Sabelhaus, Special Adviser to the Governor
Director Charlton Bonham, Department of Fish and Wildlife
Mr. Sonke Mastrup, Executive Director, Fish and Game Commission