

PARRIS MFG CO

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January 11, 2016

To Whom it May Concern

RE: Parris Manufacturing Company
Sale of "Imitation Firearms" in California

Dear Buyer:

We have reviewed the California toy gun law. At this time, we do not see any issues with the sale of the colored guns, as long as they are the colors in the list. If our products do not meet the exclusions as set forth in CA penal code 16700 then they will be classified as "imitation firearms". In addition to CA penal code 16700 and 15 USCS § 5001, we also looked at other CA codes and case law interpreting the preemption clause contained within the federal code. Significantly, we reviewed CA Penal Code § 20165, which sets forth the authorized purposes in which an imitation gun may be sold, as well as the liability for civil fines (\$10,000.00) if they are sold in an unauthorized manner.

California Penal Code § 20165 states:

- (a) Any person who, for commercial purposes, purchases, sells, manufactures, ships, transports, distributes, or receives, by mail order or in any other manner, an imitation firearm, except as authorized by this section, is liable for a civil fine in an action brought by the city attorney or the district attorney of not more than ten thousand dollars (\$10,000) for each violation.
- (b) The manufacture, purchase, sale, shipping, transport, distribution, or receipt, by mail or in any other manner, of an imitation firearm is authorized if the device is manufactured, purchased, sold, shipped, transported, distributed, or received for any of the following purposes:
 - (1) Solely for export in interstate or foreign commerce.
 - (2) Solely for lawful use in theatrical productions, including motion picture, television, and stage productions.
 - (3) For use in a certified or regulated sporting event or competition.
 - (4) For use in military or civil defense activities, or ceremonial activities.
 - (5) For public displays authorized by public or private schools.

This CA Penal Code section is significant for your purposes in that it specifically authorizes the sale of the imitation guns for the purposes enumerated in (b). We also feel that "ceremonial activities" as set forth above would encompass reenactments. Most of our products would be imitation firearms as defined. We ask that you in the remarks section below please state that you will not sell the imitation guns for any unauthorized purpose and specifically references the authorized purposes listed in the statute that you will be purchasing these items for.

Remaks:

Purchasing Agent Signature Required:

DATE:

Sincerely,

Gary Phillips
V.P. Of Operations