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March 30, 2020

Hon. Ralph S. Northam
Governor of Virginia
The Capitol
Richmond, Virginia 23218

Re: UPDATE: Removing Indoor Shooting Ranges from Executive Order 53

Dear Governor Northam:

This letter follows up on our letter to you dated March 27, 2020. As we explained in that letter, our firm represents the Virginia Citizens Defense League (“VCDL”), and we are writing to you on its behalf. Our prior letter asks you to modify your [Executive Order 53](#) (“EO 53”), issued March 23, 2020, which closes “indoor shooting ranges.” As our prior letter explains, VCDL believes that EO 53 violates the U.S. Constitution, the Virginia Constitution, and limitations on your powers specified in the Virginia emergency powers statute.

We are writing to bring to your attention that on Saturday, March 28, 2020, the Director of the Cybersecurity & Infrastructure Security Agency (“CISA”) in the Office of the Director U.S. Department of Homeland Security (“DHS”) made an important update to its [“Guidance on the Essential Critical Infrastructure Workforce: Ensuring Community and National Resilience in COVID-19 Response, Version 2.0 \(March 28, 2020\).”](#) In the section of that Guidance on Law Enforcement, Public Safety, and Other First Responders, the Director of CISA designated the Firearms Industry, and shooting ranges, as part of the nation’s Critical Infrastructure:

Workers supporting the operation of firearm or ammunition product manufacturers, retailers, importers, distributors, and **shooting ranges**. [Emphasis added.]

Particularly now that we have a determination that shooting ranges constitute part of our nation’s essential Critical Infrastructure by CISA, which is the component of DHS with responsibility over this matter, your order closing “indoor shooting ranges” should be changed and we urge you to reconsider it.

For the reasons set forth in our letter of March 27, 2020, and those additional reasons stated above, VCDL respectfully requests you to modify EO 53 to remove the restriction on “indoor shooting ranges” without delay. Should you decline to revise EO 53, please advise us so that we may advise our client.

Sincerely yours,

A handwritten signature in black ink, appearing to read "William J. Olson". The signature is fluid and cursive, with a prominent initial "W".

William J. Olson

WJO:gw

cc: Philip Van Cleave, President
Virginia Citizens Defense League