

STATE SHOTS



Important Notice:

Voting for the 3 Board of Directors seats that are up for election will be done with an on-line ballot this year. All members in good standing as of November 1, 2025 will receive an email with a link to their individual ballot. This is a secure process that allows each member to cast one and only one vote. Watch for the email in early November and vote.

We need your help!

Typical of many or most organizations, very few people have stepped up to help. Our Board of Directors is very dedicated and works hard, but we need more people with new and fresh ideas to help us, especially with technology skills, to get our message out. Our website needs to be improved, and we need to develop a stronger social media presence to reach a larger audience. Both are necessary today to get our pro Second Amendment message across.

If you are interested in seeing what we do and are possibly interested in helping, members are invited to attend our annual meeting December 7, 2025 at the Durham Pistol & Rifle Club (www.dprc.org) in Haw River, NC. The meeting begins at 11 am and lunch will be served to all attending, but please let us know you are coming, at least by December 3rd, so we can be sure to have enough food for everyone.

You can contact us at info@ncrpa.org with ideas, questions, or to let us know you will be attending the meeting.

Be sure to add our address to your safe senders list, and check your spam folder occasionally to allow our messages to get through to you. Also please support our junior rifle team by buying raffle tickets on our website. You might win one of two rifles being given away to lucky winners!

www.ncrpa.org

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Vol. 54, No. 3, 2025

The President's Column

By David McFarling, NCRPA President

Shooting Ranges And Political Stuff

This year I have become aware of a problem that I am afraid will only become worse with time. As NC's population grows, apparently without bounds, our amount of unsettled open "country" land grows increasingly smaller. As more people buy guns the need for proper places to shoot grows ever larger. Private ranges are expanding to try and cope. But the need is growing even faster. If you are on a waiting list to join a club, or if you deem it too far to drive or too expensive, what do you do?

The days of the friendly landowner saying "just come on out and shoot" is a thing of the past. I have heard way too many stories about people shooting on what they think is vacant and seemingly safe land in the "country", when the true result is bullets landing on private and occupied land down range. Often the result is bad feelings toward the shooters, property damage or worse. Early this year I reported an incident where a good friend was wounded by a round fired haphazardly through the woods. He was standing on a very safe shooting range at the time. It is unfortunate the person doing the shooting wasn't.

It is my opinion that every round fired in the state should land in a proper and adequate back stop. The only exception being when hunting and as we all know "a responsible hunter always knows what lies beyond his target and doesn't shoot unless it is safe to do so". In other words, always shoot into an impact berm or other adequate back stop.

A couple of weeks ago I found that the NC Wildlife Resources Commission (NCWRC) has taken steps to remedy this problem. In the past several years NCWRC has developed 10 shooting facilities spread across the state. The range I visited is located on the 16000 acre Caswell Game Lands. It is staffed by people hired by the NCWRC and they do a good job. At present there are 10 ranges across the state, 6 run by the NCWRC, 3 are partnerships with counties and one is a partnership with a private organization. It is free to use being paid for with money raised by the sale of hunting licenses and ammunition excise taxes.

As for the actual range, it is the safest range I have ever seen. There are 10 firing lanes, 5 rifle and 5 pistol. The range is covered and the benches are substantial. There is a partition separating each firing position and each one has a big square piece of insulated HVAC duct about 4 feet long you have to fire through, preventing a shot from going high and over the berm. Even if you could fire with the barrel elevated too much there are overhead steel baffles. The walkways are gravel or cement. It is small but well thought out, well built, safe, and free to use. The Caswell range is the only one that I have actually seen but if they are all as nice as Caswell, the NCWLC has done an outstanding job.

For more information just do a google search for NC wildlife shooting ranges. You will find locations, operating hours, operating and safety rules and any other information you need. If you need a good safe place safe to shoot look into the NCWRC ranges. After all, you did pay for them.



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Newsletter Label

The following is an explanation
 of your State Shots mailing label.

Type Membership

Membership Exp. Date

R 1/31/11

Member Name

Address

City, State, Zip

TYPE MEMBERSHIP

EXP	Expired
R	Regular Resident
NR	Regular Nonresident
TR	Temp Regular Membership
J	Junior Resident
NJ	Junior Nonresident
L	Life Membership
TL	Temporary Life
CORP	Corporate Membership
CLB	Club Membership
COM	Commercial Membership
NRASA	NRA State Association
LEG	Legislator

EXPIRATION DATE

1/31/11	Expiration Date
L-144	Life Member Number

State Shots

Our publication of the Association comes out four times each year. Your articles and opinion pieces are welcome. If you or your club has an activity that would be of interest to the entire state send us some pictures and story of your event or future events. The submission deadline dates for each issue are as follows:

December 15, 2025

We welcome your input. Everyone wants to hear from you.

NCRPA Meetings

The Board of Directors meets four times each year to conduct the business of the Association. The schedule for 2025 has been set and the remaining in-person meetings for 2025 are:

December 7 at Durham Pistol and Rifle Club

The membership is invited and encouraged to attend the meetings for input and interest. The meetings will begin at 11:00 AM and end around 3:00 PM. Lunch will be served to all who attend but please let us know if you are going to attend so that there will be enough food prepared. For information on following meetings please go to www.ncrpa.org The meetings are on the front page.

NCRPA membership is the life blood of our association, but did you know that you could also make a DONATION?

Your donation, no matter how large or small, will help support all our shooting programs including the NCRPA Junior High Power Rifle Team, the future of America's shooting sports!

Send your donation to:

NCRPA, PO Box 4116, Pinehurst, NC 28374

Or go on line to make a secure donation at www.ncrpa.org

Did you know that your Legislative Team works hard at the North Carolina General Assembly to protect your Second Amendment rights? Stay informed, get involved, and keep up with our efforts at www.ncrpa.org

On the legislative front it looks like constitutional carry is in some sort of limbo sense being vetoed by Gov. Josh Stein. The Republicans are one vote short of being able to override the veto and the Democrats seem to be solidly against it. By the time you read this the issue will probably be settled. Call your House Representative and Senator and let them know your opinion on this important issue. On the bright side we did get HB193,. Regarding concealed carry in church schools. One Democrat crossed the aisle and enabled us to override the Governor's veto. HB193 allows employees and volunteers at private schools to carry concealed weapons on school property if they have written permission from the school's board of trustees or administrative director and appropriate permits. It takes effect on Dec.1, 2025. NCRPA heavily supported this bill.

Another bill we are working hard for is HB 674.This bill would make your concealed carry to last a lifetime without renewal in NC but that is not all. If you want to carry out of state or use it to buy a firearm you still have to pay and have your CC permit renewed. We are working on another bill that will allow you to renew a CC permit online. This bill would be a really great thing for people who live in a large city like Raleigh or Charlotte.

Well that's it for now. Remember to shoot safe and often. Please be a good and responsible gun owner.Every time you have your gun in your hand you represent all gun owners so be responsible and safe. We get enough bad press as it is. Don't add to it.

COA Shuts Down Second Amendment Challenges to Firearm by Felon

July 23, 2025 Phil Dixon

Back in February, the Court of Appeals decided *State v. Nanes*, COA24-487, ___ N.C. App. ___; 912 S.E.2d 202 (Feb. 19, 2025) (summarized here). The case considered and ultimately rejected facial and as-applied Second Amendment challenges to G.S. 14-415.1, our state prohibition on possession of firearms by a felon. Nanes squarely rejected the idea that G.S. 14-415.1 was facially unconstitutional but left open the possibility that the statute may be unconstitutional as applied to a different defendant. In *State v. Ducker*, COA24-373, ___ N.C. App. ___; ___ S.E.2d ___ (May 7, 2025) (summarized here), the Court of Appeals closed the door on that possibility, ruling that Second Amendment rights do not apply to convicted felons and rejecting the need for a felony-by-felony analysis for as-applied Second Amendment challenges. Both Nanes and Ducker also considered and rejected related claims under Article I, Sec. 30 of the North Carolina Constitution. Today's post examines these decisions.

Facial Second Amendment Challenges. A facial challenge asserts that a law is wholly unconstitutional and cannot lawfully be applied to any defendant under any set of circumstances. *U.S. v. Salerno*, 481 U.S. 739, 745 (1987). Perhaps unsurprisingly, facial Second Amendment challenges to laws prohibiting the possession of firearms by convicted felons have not been successful. For instance, the Fourth Circuit Court of Appeals rejected a facial challenge to the federal counterpart of our state firearm by felon law, 18 U.S.C. 922(g)(1), in December of 2024. *U.S. v. Canada* ("Canada II"), 123 F.4th 159, 161 (4th Cir. 2024) ("No federal appellate court has held that the federal felon in possession of a firearm statute is facially unconstitutional, and we will not be the first.") (summarized here).

The defendant in Nanes argued that the firearm by felon law categorically and permanently disarmed almost all felons, regardless of whether the convictions involved violence. Rejecting that argument, Nanes observed that G.S. 14-415.4 allows certain nonviolent felons to seek restoration of their gun rights after 20

years of law-abiding behavior. State law therefore does not impose a permanent ban on possession of firearms for felons convicted of non-violent offenses. Further, the Nanes court pointed to language from the U.S. Supreme Court's seminal Second Amendment cases condoning bans on felons possessing firearms. See, e.g., *District of Columbia v. Heller*, 554 U.S. 570, 626-27, n. 26 (2008); *McDonald v. City of Chicago*, 561 U.S. 742, 786 (2010). Nanes also noted that the Court reaffirmed that principle in the more recent decision, *United States v. Rahimi*, 602 U.S. 680 (2024). In *Rahimi*, the Court upheld the federal ban on firearm possession by people subject to certain protective orders—even though no criminal conviction was required to trigger the prohibition. The Court reasoned that temporary disarmament of people who present a credible risk of harm to others was consistent with the country's historical tradition of firearms regulation (Jeff Welty blogged about that decision, here). In light of the Court's guidance, our state ban on firearm possession by felons "fit[s] comfortably within the nation's tradition of disarming dangerous individuals . . .," at least as applied to some felons. Nanes Slip op. at 9 (citing *Canada* in support).

As-Applied Second Amendment Challenges. The defendant in Nanes also argued that, even if G.S. 14-415.1 was facially constitutional, it was unconstitutional as applied to him. The defendant in Nanes was convicted of felony larceny of a dog and felony animal cruelty for stealing and killing his parents' dog. He argued that these were nonviolent offenses and that applying the state ban on firearms by felons to him did not fit within the historical tradition of firearms regulation. The Court of Appeals had no trouble rejecting that argument. In addition to the violent circumstances of his felony convictions, the defendant had a long history of assaultive conduct resulting in multiple misdemeanor convictions. "Simply put, as Defendant has a demonstrated history of violence towards others, applying section 14-415.1 against him and revoking his firearm rights is again well within this nation's tradition and history of disarming individuals who pose a threat

of violence towards others.” *Id.* at 12.

As mentioned above, Nanes cited the Canada case from the Fourth Circuit in support of its rejection of a facial challenge. Notably, Nanes did not cite *U.S. v. Hunt*, 123 F.4th 697 (4th Cir. 2024); cert. denied, ___ S.Ct. ___, 2025 WL 1549804 (summarized here), decided by the Fourth Circuit the same month as the Canada decision. In *Hunt*, the Fourth Circuit held that the Second Amendment only protects “law abiding, responsible citizens” and found that felons were not protected by the Second Amendment. Thus, no felon can mount a successful as-applied Second Amendment challenge to 18 U.S.C. 922(g)(1) (at least absent an unconditional pardon of the conviction or invalidation of the underlying law of conviction). *Hunt* at 705. Alternatively, the *Hunt* court held that disarming convicted felons was consistent with the historical tradition of firearm regulation, to the extent that 922(g)(1) did infringe on protected Second Amendment activity.

The absence of a citation to *Hunt*, coupled with the Nanes court’s individualized analysis of the defendant’s crime and background, seemed to indicate that North Carolina state courts were taking a different approach than the Fourth Circuit in *Hunt* and would consider case-by-case, felony-by-felony as-applied challenges. No longer. In *State v. Ducker*, COA24-373, ___ N.C. App. ___, ___ S.E.2d___ (May 7, 2025), the North Carolina Court of Appeals shut down case-by-case as-applied challenges to the state firearm by felon law, joining the reasoning of the *Hunt* case.

Ducker’s disqualifying felony conviction was attempted fleeing to elude police. He argued that the application of state ban on firearms possession as applied to him violated the Second Amendment, given that fleeing to elude was a low-level (class I) felony, was not inherently violent, and occurred 13 years earlier. Like the Fourth Circuit in *Hunt*, the Ducker court found that felons simply enjoy no Second Amendment protections, without regard to the nature or circumstances of their conviction. According to the Ducker panel: “[W]e need not perform this felony-by-felony analysis to determine the constitutionality of Section 14-415.1 as applied to each individual defendant who challenges it.” Ducker Slip op. at 9.

The Ducker panel, like *Hunt* before it, relied on older cases decided before the analytical shift for Second Amendment challenges brought by *New York Rifle & Pistol Ass’n, Inc. v. Bruen*, 597 U.S. 1 (2022) (summarized here). See, e.g., *State v. Fernandez*, 256 N.C. App. 539, 545-57 (2017) (convicted felons are not law-abiding citizens and are unprotected by the Second Amendment); *Hamilton v. Pallozzi*, 848 F.3d 614 (4th Cir. 2017) (same). The Ducker and *Hunt* courts determined that these earlier decisions rejecting similar Second Amendment challenges were not overruled by *Bruen* and retained their precedential value. According to these courts, as-applied Second Amendment challenges fail at the first step of the *Bruen* analysis—the ban on possession of firearms by felons does not impact protected Second Amendment conduct, because felons fall outside of the Amendment’s protections. The Ducker court also observed that it was bound by *Fernandez* unless and until the North Carolina Supreme Court overruled it. Any suggestion to the contrary in *Nanes* was neither central to its holding nor binding considering the earlier *Fernandez* decision. In *Re: Civil Penalty*, 324 N.C. 384, 379 (1989) (where two opinions of the Court of Appeals conflict with each other, the earlier opinion controls). Given its holding that regulation of firearm possession by felons is not conduct covered by the Second Amendment, the

Ducker court declined to rule on the question of whether there was an analogous historical tradition of this type of firearms regulation.

State Constitutional Challenges. As mentioned, the defendants in *Ducker* and *Nanes* both brought, and ultimately lost, challenges to G.S. 14-415.1 under Article I, Sec. 30 of the North Carolina Constitution. That provision contains language similar to the Second Amendment (as well as some quite different language) and states in pertinent part that “the right of the people to keep and bear arms shall not be infringed.” Under *Britt v. State*, 363 N.C. 546 (2009), regulations affecting this state constitutional right “must be at least reasonable and not prohibitive, and must bear some fair relation to the preservation of public peace and safety.” *Britt* at 549 (internal citation omitted). The *Britt* court established a five-factor balancing test to evaluate the reasonableness and relation to public safety of firearm regulations:

(1) The type of felony convictions, particularly whether they involved violence or the threat of violence; (2) The remoteness in time of the felony convictions; (3) The felon’s law-abiding behavior since the crime; (4) the felon’s history of responsible, lawful firearm possession during a time period when possession of firearms was not prohibited; and (5) the felon’s assiduous and proactive compliance with Section 14-415.1(a). *Britt* at 550.

In *Britt*, the North Carolina Supreme Court struck down the state firearm by felon law as applied to the plaintiff. His felony conviction for possession with intent to sell and deliver a controlled substance was not violent and was 30 years old at the time he sought to regain his gun rights. The plaintiff avoided any new trouble since his felony conviction and had a history of responsible gun ownership both before and after his conviction. Before an amendment to G.S. 14-415.1 in 2004, felons could lawfully possess firearms in certain circumstances. See G.S. 14-415.1 (1995). *Britt* did so legally and responsibly. When the law changed in 2004, he voluntarily surrendered his weapons to law enforcement. Under these circumstances, the factors weighed in the plaintiff’s favor and his as-applied state constitutional challenge was successful.

The defendants in *Ducker* and *Nanes* were not similarly situated to the plaintiff in *Britt*. *Nanes*’ felony conviction for animal cruelty was violent, according to the court, and preceded his current case by only around three years. That defendant also had a string of violent misdemeanors spanning 2010 to 2017. His behavior since his 2017 felony conviction included two more convictions for intoxicated and disruptive conduct and first-degree trespassing. *Nanes* had no history at all of responsible gun ownership—“the first known instance of Defendant possessing a gun was when he utilized a revolver to kill two people in the present case.” *Nanes* Slip op. at 16. Further, unlike *Britt*, *Nanes* did not proactively comply with the law. He only raised this challenge after he was charged with the crime of possession of firearm by felon.

Ducker’s felony conviction for attempting to flee to elude arrest, though not violent per se, indicated “a disregard for the safety of others . . .”. Ducker Slip op. at 16. While his conviction was 13 years old at the time of his challenge, that was nowhere near the 30 years at play in *Britt*, and the court noted that it had rejected other similar challenges where the conviction was up to 18 years old. Ducker was also convicted of a misdemeanor in 2017 for violating

NCRPA Pistol Teams at the CMP National Pistol Matches at Camp Perry, Ohio

The CMP National Matches are a series of marksmanship matches that determine the National Rifle and Pistol Champions. They are prestigious matches with a long history and have been held annually at Camp Perry, Ohio annually since 1907. This July, sixteen members of NCRPA joined together and spent a week together in July competing individually and as teams at the Pistol phase of the matches.

There are individual and team competitions at the National Matches. Our members formed four teams (two four-shooter Match-Pistol team, a two-shooter .22 team and a four-shooter Service Pistol team) and did very well. The highlight of the match was our NCRPA Service Pistol Team winning the Oglethorpe Trophy! This is a tremendous accomplishment and is the third time since 2019 that our team has won the Oglethorpe! Firing members of the team were Jon Shue, Neil Roberts, Grayson Palmer and John Van Swearingen; Tom Willats was the Team Captain. Our other teams did well also: our two-shooter .22 team came in 3rd out of 10 teams and our match pistol teams, NCRPA-Blue and NCRPA-Red came in 28th and 29th, respectively of 55 teams.



Our shooters did great in the individual matches, too:

Jon Shue turned in an outstanding performance, winning the CMP Match Pistol aggregate, and National Trophy Individual (Service Pistol) match, and placing second in the Presidents' Hundred match. Grayson Palmer was the high scoring civilian in the Match Pistol aggregate. Robert Peele and John Van Swearingen earned 10 points toward their Distinguished Pistol Shot badges and Robert also earned points toward his .22 Rimfire Distinguished Pistol Badge. Seven NCRPA members, Jonathan Shue, Neil Roberts, Grayson Palmer, John Van Swearingen, Willie Trowell, Eric Herrin and Jon Herrin, earned their

Presidents Hundred Tab this year.

The NRA National Championships at Cardinal Shooting Center in Maren-go, OH and the Frank Bicker memorial Regional Match is held at Canton-McKinley Rifle and Pistol Club just prior to the CMP National Matches. Jon Shue won ALL of these matches and is the reigning Triple-Crown champion! Con-gratulations to Jon and this outstanding accomplishment!



North Carolina has a long history of developing talented pistol marksmen and the NCRPA is proud of the accomplishments of our shooters. The skills these shooters brought to the Nationals were honed in local competitions throughout the state and we encourage all our members to participate in these local matches. You too can join us at Camp Perry! Information on where to shoot matches in your area is available from NCRPA board members Clark Hardesty (dprcbullseye@gmail.com) or Tom Willats (2700.ma.civ@gmail.com).



NRA BOARD OF DIRECTORS MOVING FORWARD.

YOUR NRA is moving forward with transparency and a promise to the members that we will gain your trust in how we conduct business and manage your assets.

The BOD recently met in Reston, VA and we saw many positive things come out of the week of meetings:

- 1) Your BOD Committees are ACTION focused – no longer simply receiving information from the staff and passing it along in “reports” to the full BOD and Membership. ALL committees are expected to re-focus their responsibility statements to support the NRA 2.0 promise to the members. Each committee will develop action items and once approved by the BOD assist the staff in planning and executing those actions.
- 2) FINANCE – the Finance and Audit Committees have been busy since the April Annual Meeting grasping the full financial picture of our NRA. The best news from this effort – NRA IS NOW OPERATING IN THE BLACK! These committees have set in motion transparency in funds handling and expenditure. You will soon see information available to all members in your members-only web accessed account.
- 3) MEDIA and PUBLICATIONS – NRA has a new publicity partner, and we will soon see our presence online, social media, TV, and podcasts. This new partnership will save us well over 50% of the cost over our previous contract. The committee is developing a comprehensive member App for all phone platforms and re-vamping the web site presence. - Yes, there is a “WLP scrub and remove” action team running now!
- 4) COMPETITIONS – Action is underway to revitalize and begin competitions in full. Meanwhile, the America’s Rifle Challenge has been kicked-off and several competitions have already been held.

- 5) EDUCATION & TRAINING / YOUTH PROGRAMS – This year E&T has hired two full-time and one part-time program managers, and Youth has their full-time Director on board as well. The Division is looking for a full-time Coach Program Manager to hire soon.
- 6) Several initiatives are underway to recruit and retain Members. WE ARE ONLY AS STRONG AS OUR MEMBERSHIP!

Well, I am sitting in a hotel in Albuquerque as I write this. I spent the last week at Philmont Scout Ranch where the National Outdoor Conference was underway. Personally, I spent several days presenting NRA programs that youth groups could use Beyond the Merit Badge, and beyond simply shooting rifle, pistol, and shotgun. NRA has many programs to engage the community and funding to support youth programs available now!

There is so much more to share, and I will do so in future newsletters and other means.

I look forward to working as your new Training Counselor Coordinator. Replacing Eric will be no easy task – big shoes! Eric was one of my first TC’s when I began instructing nearly two decades ago. I only hope I can do the position as well as he did.

Thank you, and I look forward to meeting as many of you as I can in December.

Jim Sheckels
NRA Board Director
NCRPA TC Coordinator.

North Carolina shooters at the CMP Highpower Championships

North Carolina Rifle and Pistol Association doesn't field a High-Power Rifle Team but North Carolina has a presence at the National matches.

Haley Robinson the current Women's Record Holder (2021) hails from Mill Spring, NC and is a member of Polk County Gun Club. Haley finished 5th of 77 entries with a score of 488-16x. NCRPA's own Savanna Andrews of Oxford, finished 20th with a score of 477-12x.

North Carolina was well represented in the National Trophy Individual Match (Daniel Boone Trophy) that had 818 competitors.

Major Kirk Freeman (USA NG) of Hendersonville, finished 2nd with a score of 497-25x in the Individual Match.

Cameron Bates of Garner, finished 6th with a score of 496-17x.

Haley Robinson, when compared to the entire 818 entrants, finished 48th.

Jeff Minder of Charlotte finished 60th with a score of 487-17x.

Bobby Robinson (Haley's dad) finished 95th with a score of 484-21x.

Other NC competitors in the National Trophy Match were Devon Cole (Hendersonville), William Silos (Burlington), Daniel Helwig (Charlotte), Hunter Blankenship (Holly Ridge), Paul Hoecke (Chapel Hill), Thomas Green (Oxford), Colby Smith (Raleigh), Jeffery Smith (Pleasant Garden), Paul Cooper (Southern Pines), Alexander McCaskill (Roxboro), Kalee Thomas (Angier), Ruth Bates (Shawboro), Aiden Schroeder (Holly Springs), Stephen Thrasher (Fayetteville), James Cole (Roxboro), John Kurek (Jacksonville), Joachine Griffith (Autryville), Austin Senger (Erwin).

As you can deduce from the scores in the National Individual Match are close, position can be determined by the "x" count or who shot the first "x" if the scores are identical. The difference of only 13 points separate 2nd place with 95th place.

In my opinion, having ventured on the Camp Perry Ranges for the first time (2016) when I was 68 years old, it is a humbling but gratifying experience. To just have competed in the National Trophy Matches is a life fulfilling experience.

Sam Summey

Vice-President NCRPA

Continued from page 4

a domestic violence protective order. This meant that he was not law-abiding since the time of his 2009 felony conviction. There was no history in the record of the defendant's responsible gun ownership at any point. Even if he had demonstrated a history of responsible gun ownership, this factor would not outweigh the others. Thus, the state constitutional challenges in both cases failed.

Takeaways. Ducker, Nanes, and the Fourth Circuit's decision in Canada indicate that facial Second Amendment challenges to firearm by felon laws are dead in the water. The same cases seem to shut the door on as-applied Second Amendment challenges as well. The as-applied issue is worth preserving, given the circuit split on the point. See *Range v. Att'y Gen.*, 124 F.4th 218 (3rd Cir. 2024) (striking down 922(g)(1) as applied to a defendant with a 1995 conviction for making false statements). That said, only the Third Circuit has so far granted a defendant relief on that kind of challenge, while many other circuits have joined the reasoning of the Fourth Circuit in *Hunt*. See, e.g., *U.S. v. Jackson*, 110 F.4th 1120 (8th Cir. 2024) (rejecting the need for felony-by-felony analysis of as-applied Second Amendment challenges to 18 U.S.C. 921(g)(1); *Vincent v. Bondi*, 127 F.4th 1263 (10th Cir. 2025) (same). The North Carolina Supreme Court has temporarily stayed the Court of Appeals decision in *Ducker*, which may indicate a desire to review the decision. See *State v. Ducker*, ___ N.C. ___, 915 S.E.2d 37 (May 20, 2025). Still, unless the North Carolina or United States Supreme Court rules otherwise on the issue, a defendant is unlikely to succeed on an as-applied Second Amendment challenge to North Carolina's firearm by felon law.

Despite this development, defenders should keep in mind that there may be other potentially meritorious Second Amendment challenges to bring in a criminal prosecution involving firearms or other weapons. See, e.g., *State v. Radomski*, 294 N.C. App. 108 (2024) (finding the firearm on education property law unconstitutional under the Second Amendment as applied to the defendant); disc. review denied, 386 N.C. 557 (2024). As far as state constitutional challenges, the *Ducker* decision indicates that it will be difficult, but perhaps not impossible, for a defendant to make a successful as-applied challenge to the firearm by felon law under Sec. 30, Article I of the state constitution. In both *Nanes* and *Ducker*, the court noted that the defendants never raised this state constitutional challenge until after they were criminally charged, unlike the plaintiff in *Britt*, who went on the offense and sought declaratory judgment (rather than raising the claim as a defense to a criminal charge). The *Ducker* court seemed to place special weight on this point. "Defendant has not identified—and we are not aware—of any cases in which a defendant has successfully challenged Section 14-415.1 as applied to him after being convicted of it." *Ducker* Slip op. at 14-15. Under that rationale, a cautious defendant with a felony conviction who seeks to lawfully possess firearms may want to pursue relief under G.S. 14-415.4 or sue civilly for declaratory judgment like the plaintiff in *Britt*, rather than raising the constitutional argument for the first time after being charged with possession of firearm by felon.



Ralph Carson

I am submitting my name for consideration for re-election for a position on the Board of Directors for the NCRPA. I have been on the Board since 2019. I work as a Project Manager in the heavy construction industry in the Raleigh area. I am an active member of the US Coast Guard Auxillary, a member of the American Legion and American Legion Riders. I am the Vice-Chair of the municipal planning commission where I have been a commission member since 2022, recently starting my second term. I was also a former member of the Raleigh Police Department and the Fredericton Police Department. I joined the National Rifle Association many years ago and I am currently a Benefactor Life Member, an NRA Ring of Freedom member and the Chair for the committee of the Wake County Friends of NRA chapter. As an NRA member, I have reached out to many other enthusiasts and have encouraged them become NRA members. I believe in unwaivering support of the US Constitution and all Amendments with specific gratitude and love for the 2nd Amendment and our firearm rights granted us. I feel I can continue to bring energy and dedication to the NCRPA and support its goals. The NCRPA continues to lobby the NC Legislature for reasonable firearm rights and bylaws and working together with the NRA to protect our rights as firearm owners and sporting enthusiasts. My personal goal is to expand membership within the NCRPA and encourage an expanded outreach, membership and events for local youth and women who have interest as gun owners to expand their knowledge, training and love for the various gun related sports and events. I would also like to provide additional support for the Friends of NRA events to expand their footprint in NC and have more people involved within each county to enhance grassroots support for the NRA. I would appreciate your vote again and support to re-elect me as an NCRPA Board member.



Mark D. Terry

I am Mark D. Terry, a Durham, North Carolina native and I currently reside in Burlington, NC. As a dedicated advocate for Second Amendment Rights, I bring a commitment to the NCRPA Board, ensuring legislation upholds logical and clear objectives protecting our freedoms. With a lifetime of experience honing marksmanship skills through hunting and range practice, I am equipped to contribute to the safe and responsible growth of shooting sports in North Carolina. As the NCRPA Range Development Coordinator, and with my recent NRA Range Development and Operations certificate, my focus is on equipping ranges to effectively address issues such as encroachment and neighbor concerns, thereby safeguarding these vital community resources for current and future generations of shooters. I am a member of a private club, and train on the same firing ranges that some State and Federal Agencies train upon. These ranges instill a deep understanding of safety protocols and responsible operation for various types of firing ranges. I am seeking re-election to the NCRPA Board and respectfully ask for your vote to continue serving the NCRPA's mission of promoting responsible firearm ownership and the continued vitality of shooting sports across North Carolina.

Sincerely yours,

Mark Terry

2025 Jr. Marksmanship Support Group Raffle

For the 2025 raffle the first prize will be a:

CMP M-1 Garand.



The rifle will come to you directly from the CMP facility in Aniston Alabama.

The second prize will be a

Savage .22 bolt action repeater



which will be delivered by B&B firearms located in Randleman N.C.

2025 Jr. Marksmanship Support Group Raffle
We really appreciate all of your participation in our raffle. The dollars you donate in this fashion go a long way in supporting our program. The drawing for the two rifles will be at the NCRPA annual meeting in December and the winners will be announced shortly afterward. To enter go to our website at www.ncrpa.org and select the junior raffle page. For the few who still receive a printed copy of the State Shots, tickets are available in each copy and more may be requested by mail. Please send requests for tickets to:

David McFarling
6645 Little Satterwhite Rd.
Oxford N.C. 27565.

Thank you for your support.

The NCRPA
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Gun Clubs & Associations of North Carolina

ALAMANCE COUNTY

Central Carolina Gun Club
5167 NC-62
Burlington, NC 27217
<https://centralcarolinagunclub.wildapricot.org>

Durham Pistol and Rifle Club
Post Office Box 965
Durham, NC 27702
(336) 567-0981
www.dprc.org

ASHE COUNTY

Ashe County Wildlife Club
PO Box 1229
West Jefferson, NC 28694
www.acwlc.org
(336) 246-9705

BRUNSWICK COUNTY

Buccaneer Gun Club, Inc.
P.O. Box 11339
Wilmington, NC 20404
www.buccaneergunclub.org

BUNCOMBE COUNTY

Asheville Rifle & Pistol Club
100 Sandy Spring Drive
Arden, NC 28704
(828) 684-1013 (range)
www.ashevillerrifleandpistolclub.org

CHATHAM COUNTY

Hickory Mountain Rifle and Pistol Club
422 N. Holly Avenue
Siler City, NC 27344
(919) 742-3017

CUMBERLAND COUNTY

Crosse Creek Rifle & Pistol Club, Inc.
c/o 1798 Potomac Road
Fayetteville, NC 28304
(910) 977-6200
Email: membership@CrosseCreekRifleandPistolClub.com
www.CrosseCreekRifleandPistolClub.com

DARE COUNTY

Outer Banks Gun Club
PO Box 118
Mann's Harbor, NC 27953
obxgc.org
(252) 255-5055

DAVIDSON COUNTY

Piedmont Handgunners Association
PO Box 891
Lexington NC 27293
www.pha-range.com

DURHAM COUNTY

Durham County Wildlife Club
3616 Hopson Road
Morrisville, NC 27560
(919) 544-1306
www.dcwcc.info

JONES COUNTY

Twin City Rifle Club, Inc.
PO box 158
Pleasant Hill, NC 27866-0158

LEE COUNTY

San-Lee Gun Club, Inc.
PO Box 2544 Riddle Road
Sanford, NC 27330

Deep River Sporting Clays
284 Cletus Rd,
Sanford, NC 27330
Bill Kempffer
919-774-7080

MOORE COUNTY

Moore County Wildlife & Conservation Club, Inc. 1820 Camp Easter Road
Carthage, NC 28337
www.mcwcc.org

PERSON COUNTY

Hycos Shooting Club
(336) 364-9700
www.hycosshootingclub.com

Piedmont Community College
Gunsmithing School
1715 College Dr.
Roxboro, NC 27573
www.piedmontcc.edu

PITT COUNTY

Down East Garand Shooters
Greenville, NC
deg@downeastgarand.org
<http://downeastgarand.org>

Pitt County Wildlife Club

3029 NC Hwy 222 East
Greenville, NC 27834
www.pittcountywildlifeclub.org

POLK COUNTY

Polk County Gun Club
1243 Little Mountain Road
Columbus, NC
www.polkcountygunclub.org

RANDOLPH COUNTY

Riverside Gun Club
PO Box 2817
Asheboro, NC 27204
(336) 889-2772
<http://riversidegunclub.org>

Triad Action Shooters Klub
Mailing address
PO Box 404
Trinity, NC 27370

ROWAN COUNTY

Rowan County Wildlife Association
P.O. Box 612
650 Majolica Road
Salisbury, NC 28147
www.rcwanc.com
email: rcwa@rcwa.club

RUTHERFORD COUNTY

Piedmont Gun Club
P.O. Box 1354
Rutherfordton, NC 28160
(828) 287-4736
www.piedmontgunclub.org

UNION COUNTY

Charlotte Rifle & Pistol Club (CPRC)
12833 E. Independence Boulevard
Stallings, NC 28105
www.cr-pc.org

WAKE COUNTY

Sir Walter Gun Club
Contact Martin Little
Raleigh, NC 27613
Home: (919) 846-6740
Work: (919) 323-5060
Email: uspsa@sirwaltergunclub.com
Range is in Creedmoor, NC
www.sirwaltergunclub.com

Shooting Sports, Inc.
PO Box 58753
Raleigh, NC 27658

WATAUGA COUNTY

Watauga Gun Club
P.O. Box 2316
Boone, NC 28607
(828) 264-6539

WILKES COUNTY

Blue Ridge Rifle & Pistol Association
PO Box 269
Millers Creek, NC 28651
Wade Parsons
(336) 973-3744

YADKIN COUNTY

Carolina West Shooting Club
P.O. Box 398
Nebo, NC 28761
(828) 659-9741
a6navy@hughes.net
www.carolinawestshooting.org

"This may be considered as the true palladium of liberty.... The right of self defense is the first law of nature: in most governments it has been the study of rulers to confine this right within the narrowest limits possible. Wherever standing armies are kept up, and the right of the people to keep and bear arms is, under any color or pretext whatsoever, prohibited, liberty, if not already annihilated, is on the brink of destruction."

- St. George Tucker,
Blackstone's Commentaries on the Laws of England,
1803

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The 2nd Amendment

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arms, shall not be infringed.*

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