



# 2026 Rules & Review for California FFLs

2026 Firearm Industry  
Compliance Webinar Series



# Additional Educational Resources



Industry Compliance Courses & More!

- Firearm E-Commerce Blueprint
- Unlocking Success in the NFA Space
- Winning at ATF Inspections
- Completing the Form 4473
- Multiple Sales Report

[NSSF.org/Education](https://www.nssf.org/education)



# Itinerary

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- Security
- New Legislation
- DOJ Reviews and Reminders
- Storage
- Questions



# Security Requirements

Any time when the licensee is not open for business; all firearms shall be secured using one of the following methods as to each particular firearm:



Store the firearm in a secure facility that is a part of, or that constitutes, the licensee's business premises.



Secure the firearm with a hardened steel rod or cable of at least one-eighth inch in diameter through the trigger guard of the firearm. The steel rod or cable shall be secured with a hardened steel lock that has a shackle. The lock and shackle shall be protected or shielded from the use of a bolt cutter and the rod or cable shall be anchored in a manner that prevents the removal of the firearm from the premises.



Store the firearm in a locked fireproof safe or vault in the licensee's business premises.

# Security Requirements continued

## California PC 26806

(a) Commencing January 1, 2024, a licensee shall ensure that its business premises are monitored by a digital video surveillance system that meets all of the following requirements:

(1) The system shall clearly record images and, for systems located inside the premises, audio, of the area under surveillance.

(2) Each camera shall be permanently mounted in a fixed location. Cameras shall be placed in locations that allow the camera to clearly record activity occurring in all areas described in paragraph (3) and reasonably produce recordings that allow for the clear identification of any person.

(3) The areas recorded shall include, without limitation, all of the following:

(A) Interior views of all entries or exits to the premises.

(B) All areas where firearms are displayed.

(C) All points of sale, sufficient to identify the parties involved in the transaction.

(4) The system shall continuously record 24 hours per day at a frame rate no less than 15 frames per second.

(5) The media or device on which recordings are stored shall be secured in a manner to protect the recording from tampering, unauthorized access or use, or theft.

(6) Recordings shall be maintained for a minimum of one year.

(7) Recorded images shall clearly and accurately display the date and time.

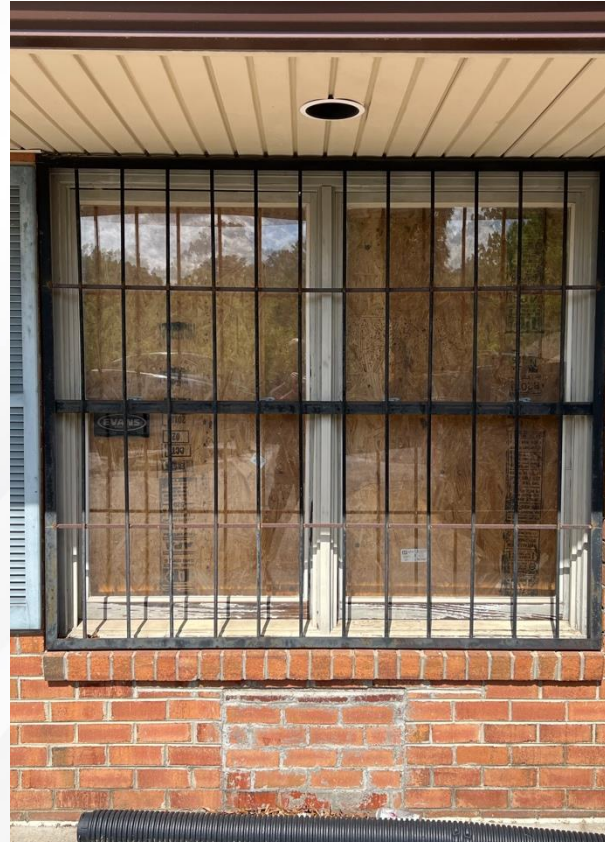
(8) The system shall be equipped with a failure notification system that provides notification to the licensee of any interruption or failure of the system or storage device.



# Security Requirements continued

## Windows

All exterior windows and/or skylights must be secured with steel window guards, or metal bars with **openings not to exceed five inches when measured in any direction**.



# Security Requirements continued



## Metal Grates/Bars

All exterior windows and/or skylights must be secured with steel window guards, or metal bars with **openings not to exceed five inches when measured in any direction**.

# New Legislation

## Secure Facilities AB 584

Expands the definition of “secured facility” to include a perimeter doorway with a windowed or windowless steel door that is equipped with panic hardware that operates a multipoint lock that bolts into the interior frame of the door and meets other specifications.



# New Legislation

NEW  
Requirements!

Secure Facilities AB 584 continued: for Manufacturers

Expands the definition of “secured facility” in PC 29141 (for those on CLM) to include:

(g) Perimeter walls of rooms in which firearms are stored are constructed of concrete or at least 10-gauge expanded steel wire mesh utilized along with typical wood frame and drywall construction. If firearms are not stored in a vault, the facility shall use an exterior security-type door along with a high security, single-key deadbolt, or other door that is more secure. All firearms shall be stored in a separate room away from any general living area or work area. Any door to the storage facility shall be locked while unattended.

(h) Perimeter doorways, including the loading dock area, are locked at all times when not attended by paid employees or contracted employees, including security guards.

(i) Except when a firearm is currently being tested, any ammunition on the premises is removed from all manufactured guns and stored in a separate and locked room, cabinet, or box away from the storage area for the firearms. Ammunition may be stored with a weapon only in a locked safe.

# New Legislation - continued

## 27535 PC effective 4/1/2026

No one shall make an application to purchase more than three in combination of firearms/completed frames/receivers/precursor parts within the same 30-day period.

### Exemptions:

- LEAs or agency duly authorized to perform LE duties
- State or local correctional facilities
- Private security companies
- LEO per 830 PC
- Motion picture, TV or video production company, or entertainment/theatrical company whose production involves the use of firearm(s)



# New Legislation - continued

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## 27535 PC 3 in 30 Exemptions continued:

- CFD (for inventory) or FFL03 with COE
- PPT where the seller is required by state law or court order to relinquish all firearms
- PPT when seller is personal representative of decedent's estate who is transferring the firearm(s) to heir(s)/surviving spouse/trust beneficiary
- Exchange (within 30 days)/replacement of a reported lost/stolen firearm
- Firearm being returned to owner
- Community College (certified by POST) to present the LE academy basic course or other commission-certified LE training

# New Legislation - continued

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## Machinegun-convertible pistols AB1127

- Expands definition of a machinegun to include any machinegun-convertible pistol (MCD) equipped with a pistol converter (switch).
- Defines MCD as any semiautomatic pistol with a cruciform trigger bar that can be readily converted by hand or with a common household tools into a machinegun by the installation or attachment of a pistol converter as specified.
- Defines “pistol converter” as any device or instrument that, when installed in or attached to the rear of the slide of a semiautomatic pistol, replaces the backplate and interferes with the trigger mechanism and thereby enables the pistol to shoot automatically more than one shot by a single function or the trigger.

# New Legislation - continued

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## Machinegun-convertible pistol exemptions 27595(c)PC:

- LEA, the military and naval forces
- LEOs pursuant to 830.1 or 830.6PC
- Any forensic lab or lab employee, acting within the scope and course of their duty
- PPTs (including consignments)
- Gunsmith for service/repair
- CFD/Licensed Manufacturer, or FFL out of state
- RTO after storage for safekeeping or temporary prohibition

# New Legislation - continued

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## More about machinegun-convertible pistols:

- MCD pistols must be on DOJ's Safe Handgun roster
- DROS application must be submitted by 11:59 pm June 30, 2026
- MCD pistol must be delivered/entered in DES prior to DROS applicable expiration



# New Legislation continued

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## Ghost Guns AB1263 and SB704

### Effective 1/1/2026 Barrel Requirements:

- Firearm barrels, not attached/affixed to a firearm must be transferred by a fully licensed firearm dealer.
- The individual purchasing/acquiring the firearm barrel must be at least 18 years old and not prohibited under federal and/or state law.
- Commencing 7/1/2027, firearm barrels will require a DROS

33700 PC

# New Legislation continued

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## Ghost Guns continued

Effective 1/1/2026 expanded definitions:

- **“Firearm Manufacturing Machine”** includes a machine that is similar to a three-dimensional printer or CNC milling machine, and includes machines marketed/sold or reasonably designed, or intended to be used to manufacture components or firearm accessories in addition to firearms.
- **“Firearm Accessory”** is an attachment or device designed, or adapted to be inserted into, affixed onto, or used in conjunction with a firearm, that is designed/intended, or functions to increase the firearm’s rate of fire, or increase the speed at which a person may reload/replace the magazine.
  - Any other attachment/device described in PC 30515 that would render a firearm an AW.
  - Any other device, tool, kit, part(s) set that is clearly designed and intended for use in manufacturing firearms.

# New Legislation continued

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## Ghost Guns continued

### Age Verification Requirements:

The firearm industry member must do all the following prior to completing the sale/delivery of a firearm accessory, manufacturing machine or barrel unattached to a firearm to the purchaser:

1. Provide the purchaser with a clear and conspicuous notice that it is generally a crime in CA to engage in specified conduct without a valid license to manufacture firearms.
2. Receive and acknowledgement from the purchaser attesting they have received and understand the notice.
3. Require the purchaser to provide proof of age (18) and identity.

# New Legislation continued

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## Ghost Guns continued

### Shipment Requirements:

For shipment of a firearm accessory, manufacturing machine or barrel unattached to a firearm, the industry member must:

1. Ensure all packages are conspicuously labeled with the words: “Signature and proof of identification of person aged 18 years or older required for delivery”.
2. Ensure the shipping instructions list an address that matches the purchaser’s identification.
3. Require the purchaser, upon delivery, to present the courier with proof of identification and the purchaser’s signature in order to receive the item(s).

# New Legislation continued



## SB 241 - CFD Training

All licensed firearm dealers and their employees who handle/process the sale, loan, or transfer of firearms/ammunition are required to annually complete the specific DOJ/BOF Firearm Dealer training course.

- Training addresses the topics specific to firearm dealers in California.
- First training and passing test must be completed between July 1, 2026 to June 30, 2027.
- Passing test score is 70% and above.
- Certification is good for one year from the date of test completion.
- Training can be found at [oag.ca.gov/firearms/fdatc](https://oag.ca.gov/firearms/fdatc)

# New Legislation continued

## Violation Fees for non-compliance



- Level 1: \$100 per violation  
Example: Fees and licenses not posted
- Level 2: \$500 per violation  
Example: Missing DROS supporting documents
- Level 3 and 4: \$1,000 per violation  
Example Level 3: Employee w/o COE, Security, Missing exemption documents  
Example Level 4: Fraudulent licenses or documents, Falsification of DROS, Possession of AW w/o DWP
- Level 3 and 4: Fee increased to \$3,000 per violation if:
  - The dealer fails to take corrective action by the compliance date or
  - DOJ determines the dealer knowingly or with gross negligence violated the law

# DROS Updates & Reminders

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## Firearm Safety Certificate (FSC):

Pursuant to Penal Codes 34210 and 26866, firearm dealers are required to distribute the Firearm Safety and Risk of Firearm Ownership pamphlet to the purchaser/transferee of a firearm at the start of the waiting period.

FSC Safety Study Guide, Tests (all), Answer Sheet, and Answer Key have all changed.

There is no Spanish Version available at this time.

[FSC Manual, pdf](#) (revised June 2025)

[FSC Study Guide, pdf](#) (revised June 2025)

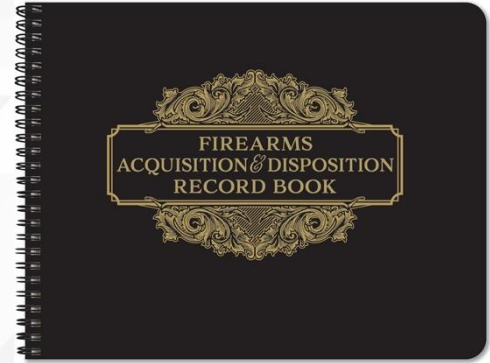
[Firearms Safety and the Risk of Owning A Firearm Pamphlet](#)

# DROS Updates & Reminders continued

## A&D Firearm Disposition

Remember: The only disposition options available for a firearm logged into your A&D Book are:

- Dealer to Dealer
- Dealer to Law Enforcement Agency
- DROS
- Gunsmith Return (with no change of firearm and/or serial number)



# DROS Updates & Reminders continued

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## Centralized Lists

CL

CLEFFL

CLM

## Certificate Of Eligibility

Responsible parties (on FFL)

Note: You must add the additional names to your CFD account. It is not automatic.

# DROS Updates & Reminders continued

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## Manufacture Licensing

- California considers assembling firearms as manufacturing.
- Assemble/build 4 or more serialized pieces (lower or completed firearm) in a year, you are required to be on Centralized List of Manufacturers (CLM) in addition to regular CL and FFL 07.

# DROS Updates & Reminders continued

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## DROS Exempt Transaction Types

Exempt handgun DROS when firearm is exempt:

- Single action
- Single shot exemption

Exempt handgun DROS when purchaser is exempt: LEO

Exempt handgun DROS when transaction is exempt: (Does not include PPT)

- Operation of Law
- Intrafamilial Transfer

C&R – use the C&R handgun or long gun DROS

# Storage - Prohibited Storage

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## Acquired from LEA:

- Log into A&D Book (example: acquisition: XPD (owner name))
- Enter in DES as “storage”.
- If purchased for inventory, complete FDAR in DES and hold 30 days.
- When prohibition is over, firearm(s) must be DROSeD back to the owner, using the Temporary Storage Return option, or PPT to someone else as applicable (Exempt from 3 in 30).

# Storage - Prohibited Storage

## Acquired from individual:

- Prohibition must have an end date.
- Enter in DES as storage.
- Complete court paperwork if applicable and give to the prohibited individual to return to court.
- When prohibition is over, firearm(s) must be DROsed back to the owner, using the Temporary Storage Return option, or PPT to someone else as applicable.
- If purchased for inventory, complete FDAR in DES and hold 30 days.



## NSSF Member Benefits for Retailers

- Compliance Hotline
- SHOT University Online
- Discounts to Live Events including SHOT Show (first buyer badge is free - additional registrations discounted)
- Member Benefit Provider Discounts
- Access to Programs Such as First Shots

[nssf.org/membership/join/](https://nssf.org/membership/join/)

## NSSF Compliance Consultant Team

### ATF Consultants



**Judy Bender**  
judybender73@gmail.com  
630-418-0141



**Harry McCabe**  
harry@mccabeconsultingllc.com  
931-505-3638



**Andrew Graham**  
andy@grahamia.com  
720-670-0096



**Bill Napier**  
lpcbill@gmail.com  
308-249-0131



**Wally Nelson**  
nels4947@outlook.com  
703-505-2617



**Judyth Ledoux**  
ledoux.judyth@gmail.com  
202-528-9465

### CA DOJ Consultant



**Renee Lewis**  
rlewis.consultant@gmail.com  
916-717-5304

### OSHA Consultant



**Dale Krupinski**  
oshacoach@ontargetsafetyacademy.com  
303-351-7915

### Federal Excise Tax Consultant



**Richard M. Weimer**  
akrich246@yahoo.com  
704-641-0531

## Meet The Team



ANY  
QUESTIONS



# Renee Lewis

(916) 717-5304

[rlewis.consultant@gmail.com](mailto:rlewis.consultant@gmail.com)

