



January 31, 2017

The Honorable Paul Ryan  
Speaker of the House  
United States House of Representatives  
H-232,  
The Capitol  
Washington, DC 20515

The Honorable Nancy Pelosi  
House Minority Leader  
United States House of Representatives  
233 Cannon House Office Building  
Washington, D.C. 20515

**Re: Safari Club International Support for House Joint Resolution 40**

Dear Speaker Ryan and Minority Leader Pelosi:

Safari Club International (Safari Club) supports House Joint Resolution 40, which provides for Congressional disapproval under the Congressional Review Act of the final rule submitted by the Social Security Administration (SSA) relating to "Implementation of the NICS Improvement Amendments Act of 2007," adopted on December 19, 2016, 81 Fed. Reg. 91702

Safari Club seeks Congressional disapproval of the rule for several reasons. It deprives an individual of the ability to receive or possess a firearm, including for recreational hunting, due to that individual's inability to manage his or her financial affairs (Firearms Rule). Under the Firearms Rule, the prohibition would apply when the SSA designates a representative payee because of the individual's mental impairment. A mental impairment that makes an individual incapable of handling his/her financial affairs does not necessarily equate to an inability to properly abide by the law in the use of firearms. The Firearms Rule unfairly attributes illegal conduct to law abiding citizens.

In addition, the Firearms Rule fails in its attempt to rectify its unfair treatment of individuals with mental impairments through its program for individuals to request relief from Federal Firearms prohibitions. This program places on the individual with a mental impairment the costly and burdensome task of collecting and presenting data to overcome the presumption that he or she is incapable of abiding by the law. This program forces upon law-abiding citizens the task of confronting a federal bureaucracy just to prove that they should not be unfairly treated as a criminal due to a mental impairment.

For these reasons, Safari Club supports a joint resolution stating "that Congress disapproves the rule submitted by the Social Security Administration relating to Implementation of the NICS Improvement Amendments Act of 2007, and such rule shall have no force or effect."

If you have any questions concerning this letter, please contact Anna Seidman, Director of Litigation, Safari Club International at [aseidman@safariclub.org](mailto:aseidman@safariclub.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Higgins".

Larry Higgins,  
President, Safari Club International