

IN THE WASHINGTON SUPREME COURT

STATE OF WASHINGTON,)	No. 104118-7
)	
Respondent.)	
)	STATEMENT OF
v.)	ADDITIONAL
)	AUTHORITIES
CHRISTOPHER KOCH)	
)	
Petitioner.)	

Christopher Koch, the petitioner, submits as additional authorities this Court’s recent grant of review in *State v. Hamilton*, No. 104072-5, 2025 WL 2249840, at *1 (Wash. Aug. 6, 2025) and the dissenting opinion in *State v. Gator’s Custom Guns, Inc.*, __ Wn.3d __, 568 P.3d 278, 297-98 (2025) (Gordon McCloud, J., dissenting).

As framed by this Court’s commissioner, the issue in *Hamilton* is: “Whether RCW 9.41.047(1)(a), which prohibits a person convicted of a felony from possessing a firearm, violates the Second Amendment right to bear arms when applied to a person convicted of vehicular homicide committed in disregard

for the safety of others. See RCW 46.61.520(1)(c).”

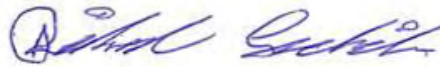
This issue is similar to the Second Amendment issue presented in Mr. Koch’s petition for review. Mr. Koch argues that his conviction for unlawful possession of a firearm violates the Second Amendment because it is based on having prior felony convictions for non-violent felonies, specifically forgery, possession of stolen property, and identity theft. Pet. for Rev. at 1, 8-13

And in *Gator’s Custom Guns*, Justice Gordon McCloud wrote this Court should overrule prior precedent and hold that regulations of the fundamental right to bear arms under article I, section 24 of the Washington Constitution are subject to strict scrutiny. *Gator’s Custom Guns, Inc.*, __ Wn.3d __, 568 P.3d 278, 297-98 (2025) (Gordon McCloud, J., dissenting). Mr. Koch argues in his petition that this Court should reconsider its framework for article I, section 24 claims, including for adoption of strict scrutiny. Pet. for Rev. at 1, 13-18.

As in *Hamilton*, the Court should grant review. This Court may stay the petition until *Hamilton* is decided.

This document contains 270 words excluding the parts of the document exempted from the word count by RAP 18.17

Respectfully submitted this 15th day of August, 2025.



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WASHINGTON APPELLATE PROJECT

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