

2017

The Evolution of Weapons Policies on College Campuses in the 21st Century

Jason Barr
Old Dominion University

Follow this and additional works at: <http://digitalcommons.odu.edu/aphe>



Part of the [Higher Education Commons](#)

Recommended Citation

Barr, Jason (2017) "The Evolution of Weapons Policies on College Campuses in the 21st Century," *Academic Perspectives in Higher Education*: Vol. 3 : Iss. 1 , Article 1.

Available at: <http://digitalcommons.odu.edu/aphe/vol3/iss1/1>

This Article is brought to you for free and open access by ODU Digital Commons. It has been accepted for inclusion in Academic Perspectives in Higher Education by an authorized editor of ODU Digital Commons. For more information, please contact digitalcommons@odu.edu.

Abstract

A conservatively-minded campus, Liberty University's administrators have, like many college campuses, struggled with creating an appropriate weapons policy. The policies in existence prior to 2011 were more traditionally anti-weapon, while those created after 2011 have been more forgiving. This article examines the background, both national and local, for these shifts in policy.

Keywords: Liberty University, weapons on campus, guns on campus, history of higher education

Introduction

The massacre conducted by Seung-Hui Cho at Virginia Tech, where 32 people were killed, led to a national reevaluation of gun policies on college campuses. College administrators, state legislatures, and federal courts all began crafting new policies or reevaluating existing policies in numerous states across the nation. It is useful to examine these trends by examining Liberty University, which has risen to national prominence as a result of its conservatively-minded branding, and how its gun policies have shifted in response to a variety of legal precedents.

Liberty University

As Liberty University rose to national prominence as a politically conservative campus, focusing on the evolution of this campus's weapons policies and comparing those policies to national trends is illuminating. Liberty University often invites conservative stalwarts such as Glenn Beck, Jeb Bush, Ted Cruz, and Mitt Romney, among others, to speak at commencement or convocation ceremonies. Additionally, upon admission, a student receives—and is expected to abide by—a 46-page collection of rules called “The Liberty Way,” which features a variety of reprimands and monetary fines for actions such as “attendance at a dance,” “attendance at, possession or viewing of, an ‘R,’ ‘NC-17’ or ‘X-’rated movie,” “abortion,” and “involvement with witchcraft, séances or other satanic or demonic activity.” Every undergraduate student is also required to take a series of religion courses such as Evangelism 101 (Roose, 2009).

Thus, it is not hard to imagine that Liberty University, in an effort to create an environment perceived as friendly to conservative politicians, students, and academics, has changed their weapons policies to maintain this status. At the time of the Virginia Tech

massacre, Liberty University had a total ban on firearms in place, matching the overall trend at numerous other public universities (LaPoint, 2010).

However, in 2011, Liberty changed their weapons policy to remove the complete ban on firearms, allowing visitors and Liberty students over the age of 21 to carry concealed weapons, so long as they received permission from the Liberty University Police Department in advance (Bartlett, 2013). In response, the university received 64 applications, 26 student applications and 28 faculty applications (“Liberty,” 2011). University officials touted the policy change as being greeted with an “outpouring of gratitude” from faculty, students, and staff (“Liberty,” 2011). In 2013, Liberty further updated their weapons policy again to allow concealed carry license holders to bring weapons onto campus, so long as they do not bring the weapons into school facilities (Bartlett, 2013). The amendment to the policy was ostensibly to allow concealed carry holders to keep their weapons in their vehicles or to leave them with the Liberty University Police Department for safekeeping. These changes in policy serve two purposes for Liberty University: first, to maintain its credibility as a conservative bastion (and thus continue to be friendly to conservative speakers and their causes), and second, the policy changes reflected a growing national right-wing trend to allow or further allow guns on campus.

Although Liberty University’s initial numbers of applications to carry weapons was low, administrators may have felt political or student pressure to cater to the desires of their adult population, especially in consideration of several lawsuits, legislation, and legal opinions across the nation. A timeline of the shifts in policies at Liberty and other universities follows.

Chronological Shifts in Policy

Pre-2011 Policies

Liberty University's weapons policy can be found as a separate link on the Liberty University Police Department's Web page. The weapons policy, in its entirety, reads:

[t]he possession, storage, display, or use of any kind of ammunition, firearms, replicas, fireworks, explosives, air rifles, air pistols, paintball guns, or any other potentially lethal instrument is prohibited on University property. ANY WATER GUN THAT IS SIMILAR TO ANY TYPE OF FIREARM FITS IN THIS CATEGORY. ANY WATER GUN THAT IS USED IN ANY WAY TO ANNOY ANOTHER PERSON WILL ALSO BE CONFISCATED. (emphasis theirs, "Firearms on Campus," 2007).

Punishments for violating the policy can be found in "The Liberty Way" manual. It is interesting to note that water guns may have been viewed as a greater nuisance by police and administrators, as water guns received particular and peculiar emphasis in the weapons policy.

Many higher education institutions in the United States had "gun free" policies for their campuses. Such policies seemed to be more firmly in place after the Virginia Tech shootings in 2007. However, for some individuals and lobbying groups, the Virginia Tech massacre provoked the opposite response. The argument shifted to a need for students to protect themselves on campus from people like Seung-Hui Cho. This reasoning—that armed students, faculty, or staff could prevent crimes on campus—was given new life in 2006 in Utah. In *University of Utah v. Shurtleff* (2006), the University of Utah sued the state's attorney general after the state legislature passed a law that essentially stripped away any higher education institution's ability to regulate or ban firearms. The Utah Supreme Court upheld the law, forcing

higher education institutions in Utah to allow any citizen with the appropriate gun licenses to carry anywhere on campus. In its decision, the Utah Supreme Court noted that the University of Utah did not have “the authority to enact firearms policies in contravention of Utah statutory law” (p. 19). The usage of the word “policies” in this decision would greatly impact higher education institutions across the United States; in an attempt to avoid “policies” restricting weapons on campus, many institutions began to parse words, instead relying, as we will see, on “regulations” restricting weapons on campus.

Other court decisions also affected higher education institutions weapons policies. The *District of Columbia v. Heller* (2008) United States Supreme Court decision loosened gun restrictions in the United States by determining, in part, that American citizens had rights to own handguns. The decision forced many jurisdictions, such as Washington, D.C., to remove handgun ownership bans entirely. The *District of Columbia v. Heller* (2008) decision spawned a number of other major lawsuits that began to slowly focus in on gun ownership, concealed carry, and where the government could place restrictions on a citizen’s right to take their weapons. The next major United States Supreme Court decision on gun ownership was *McDonald v. City of Chicago* (2010), which further weakened a government entity’s ability to control where citizens could take their weapons. Although *McDonald v. City of Chicago* also did not directly include higher education institutions the decision did include language that would allow certain governmental entities, such as schools, higher education institutions, and courthouses the right to ban weapons on their grounds. This language—the “sensitive places” of the decision—did not explicitly decide what constituted a “sensitive place” (Wasserman, 2011), thus prompting another flurry of lawsuits in a variety of states and also nationally.

One of these court cases, *DiGiacinto v. Rector & Visitors of George Mason University* (2010) attempted to define what constituted a “sensitive place.” DiGiacinto had sued George Mason University for the right to carry his weapon on campus grounds, citing the *Heller* and *McDonald* decisions. The Virginia Supreme Court, however, decided that DiGiacinto did not have the right to carry his weapon on George Mason University’s campus, stating that

approximately 50,000 elementary and high school students attend summer camps at GMU and approximately 130 children attend the child study center preschool there. All of these individuals use GMU’s buildings and attend events on campus. The fact that GMU is a school and that its buildings are owned by the government indicates that GMU is a “sensitive place.” (p. 9).

A few months after the decision, Virginia Senator Emmett Hanger asked Republican Attorney General of Virginia, Ken Cuccinelli, for clarification. At issue was the University of Virginia weapons policy, which prohibited employees and visitors from bringing any guns into campus buildings without prior approval from the University’s chief of police. The attorney general, lamenting the *DiGiacinto* (2010) decision, nevertheless differentiated between a campus *policy* and campus *regulations*. Policy, according to Cuccinelli would directly violate a citizen’s right to carry firearms; however, a regulation would not (No. 11-078). Essentially, the Virginia concealed carry process and legislation could not be pre-empted by a policy, but a regulation—which goes through a more stringent approval process, often including the college’s Board of Visitors—could supersede the concealed carry legislation. The University of Virginia quickly changed its weapons policy to a weapons regulation (Strong, 2013). This change was followed by a large number of Virginia colleges and universities entering their regulations into the

Virginia Register, including Old Dominion University, Richard Bland College, Virginia Military Institute, and Longwood University, among others.

These decisions opened the door for higher education administrators to reconsider existing weapons policies for their campuses. Interestingly, as two separate incidents that occurred gave colleges in Virginia the legal right to bar guns on college campuses, Liberty University did the opposite and instead relaxed the university's restrictions.

2011 Policy Shifts

Liberty University enacted a policy that allowed guns on campus in 2011 ("Firearms on Campus," 2011). Conversely, Liberty University's policy shifts can be seen as embracing Virginia's concealed carry laws rather than avoiding them through regulatory processes. In an announcement on the Liberty University Police Department's Web page, the policy was designed to create

exceptions for University visitors with valid concealed weapons permits to come on campus with their weapons but still prohibits them from having weapons in University facilities. The policy is designed so persons with concealed weapons permits can keep their weapons in their locked cars while visiting campus without violating University policy. Similarly, members of the University community that are over 21 with concealed weapons permits can seek permission from LUPD to carry concealed weapons outside facilities and store them in their locked vehicles. LUPD can also permit certain faculty and staff to have concealed weapons inside buildings and stored in secured containers in their offices. The new weapons policy also outlines a new procedure for members of the University

community of any age to store their weapons with LUPD. (“Firearms on Campus,” 2011).

This shift could be seen as part of a national trend of states or institutions relaxing prohibitions to weapons on campus. Wisconsin, for example, passed a law that required higher education institutions to perform the task of placing signs at the entrances of every building in which guns were not allowed. The legislation required the signs to be “at least 5 inches by 7 inches” (Wisconsin, Act 35, section 943.13, p. 18).

The shift from a complete weapons ban on college campuses slowly moved toward a ban on weapons only in campus buildings, both nationally and at Liberty University. The 2011 Liberty weapons policy allowed police officers, security officers, and concealed carry permit holders to have weapons on campus. Police officers, security officers and faculty and staff are allowed to “carry such concealed weapon on University property and in University facilities.” Students and visitors, however, can only carry the concealed weapon on “University property but not in University facilities” (“Firearms on Campus,” 2011). The policy provides approved storage for the weapons for all listed stakeholders, including storing the weapon with the police department, or in the stakeholders’ locked vehicles.

National Trends Emerge in 2012

The year 2012 could be considered a watershed year for policy realignments surrounding the issue. Two court decisions in Kentucky and Florida further delineated the interpretation of “sensitive places.” In *Mitchell v. University of Kentucky* (2012), the Kentucky Supreme Court found in favor of Michael Mitchell, an employee of the campus’s medical center. Campus security personnel discovered a firearm in Mitchell’s vehicle and terminated his employment, pointing to a longstanding UK policy that forbids weapons on campus. Mitchell did have a valid

concealed carry license. Even though the court's decision noted that "universities, including UK, have an implicit right to control possession of deadly weapons on property under their control" (p. 8), the court ultimately decided that the UK policy superseded existing Kentucky state regulations, which, in fact, allowed concealed weapons to be kept in private and personal property such as vehicles. Interestingly, in a "reluctant" concurrence, Chief Justice John Minton expressed exasperation with the labyrinthine nature and vagueness of Kentucky law toward campus gun policies:

With the amendment, is this subsection now meant to be among the KRS 527.020 exceptions to KRS 237.115? That is, notwithstanding its general authority to control deadly weapons on its property, and notwithstanding its express authority under KRS 527.020(4) to control deadly weapons in a licensed carrier's vehicle, are we to understand that the University is now powerless to keep its students and employees from stashing loaded guns in the unlocked glove compartments of their unlocked vehicles, not only powerless but actually subject to student lawsuits if it seeks to rid its parking lots of that hazard? That result strikes me, as I am sure it will strike many parents, as an affront to common sense. (p. 18)

Minton, however, concurred with the majority opinion, which essentially allows concealed carry permit holders to leave weapons in their vehicles in the parking lots of Kentucky higher education institutions.

In a similar case, *Florida Carry, Inc., v. University of North Florida* (2012), the Supreme Court of Florida also decided that concealed weapons could be stored in vehicles on campus. In this decision, an adult student, Alexandria Lainez wished "to carry a firearm while traveling to and from school as a lawful method of self-defense" (p. 3). As a result of her desire to carry

weapons in other places, Lainez wanted to essentially leave her gun in her vehicle while she attended classes. As in *Mitchell v. University of Kansas*, the Florida Supreme Court found that “[t]he legislature has preempted [the university] from regulating firearms” (p. 21). In his dissent, Justice Philip J. Padovano expressed the same concerns as Justice Minton in Kentucky, arguing that “state universities have the independent constitutional authority to adopt rules and regulations governing the conduct of their students” (p. 63). Padovano further echoes Minton in his concerns about campus safety, writing that

I believe that the University of North Florida had not only a right, but also a duty to adopt regulations such as the one before the court. It is fair to assume that most parents expect state universities to ensure the safety of their daughters and sons while they are in school. This regulation was plainly designed as a safety measure. Whether it succeeds in that goal is, of course, debatable. Some would argue that the best way to keep students safe on campus is to allow them to be armed, while others argue that the best way to ensure their safety is to prohibit guns on campus [...] If the university concludes that the best way to protect students is to prohibit guns on campus, it is not for the Legislature or the courts to interfere with the judgment. (p. 69-70)

Padovano also mentions *Heller*'s (2008) “sensitive places,” explaining that “the owner of a home may prohibit a visitor from bringing a firearm into his or her home,” and that such a restriction “would not be a restriction of the visitor’s rights” (p. 72). The majority decision, however, paved the way for students in Florida to bring guns onto the campus grounds and store them in their vehicles. Again, the provision in *Heller*, restated in *McDonald*, concerning

“sensitive places” has caused no small amount of confusion or consternation in the state courts confronted with guns on campus cases and has led to wide variances from state to state.

In Colorado, in the case of *Regents of the University of Colorado v. Students for Concealed Carry on Campus* (2012), the Colorado Supreme Court found in favor of the lobbying organization and a trio of students who wished to carry weapons while “traveling to, from through or on the campuses of the University of Colorado” (p. 6). The challenged policy—first enacted in 1994—was found to have been superseded by the Colorado General Assembly’s 2003 Concealed Carry Act. In its decision, the court argued that “the General Assembly intended to divest the Board of Regents of its authority to regulate concealed handgun possession on campus” (p. 4). As a direct result of the decision, students with concealed carry permits who attended the University of Colorado may carry their weapons throughout the campus. Colorado joined Utah as one of two states in the nation that allows concealed carry on college campuses. In response, another lobbying group, Safe Campus Colorado, continues to attempt to add language to the 2014 ballot that would grant restrictions on concealed guns on campus once again (“Concealed- Carry,” 2014).

In other states, however, in the void of state court decisions, the legislative bodies have worked to adjust or affirm the campus policies. In Kansas, for example, the state legislature passed a law in which a college campus may keep and maintain its own gun-restrictive policies but only if the campus provides additional security measures. The legislation language notes that

“[t]he carrying of a concealed handgun as authorized [...] shall not be prohibited in any state or municipal building unless such building has adequate security measures,” and included a provision for

the use of electronic equipment and personnel at public entrances to detect and restrict the carrying of any weapons into the state or municipal building, including, but not limited to, metal detectors, metal detector wands or any other equipment used for similar purposes to ensure that weapons are not permitted to be carried into such building by members of the public. Adequate security measures for storing and securing lawfully carried weapons, including, but not limited to, the use of gun lockers or other similar storage options may be provided at public entrances. (Kansas, 2012)

The legislature further requires that the security measures be placed on file with the state attorney general and local law enforcement officers. Kansas colleges and universities have four years to comply with the law.

2013 National Trends

A trio of court cases seemed to affirm Liberty University's new policy allowing the storage of weapons in locked vehicles. In the case of *Mitchell v. the University of Kentucky* (2012), the Kentucky Supreme Court decided in favor of a campus employee who carried a legal concealed carry permit and kept his weapon locked in his parked car during his work schedule. Also in 2012, the Florida Supreme Court reached a similar decision in *Florida Carry, Inc. v University of North Florida*. In Colorado, the state Supreme Court reached a similar decision in *Regents of the University of Colorado v. Concealed Carry on Campus* (2012), finding that state legislation regarding weapons on campus superseded campus administrator policies.

The Arkansas state legislature passed a law in 2013 that addresses the carrying of concealed weapons by faculty and staff on the state's public campuses. According to this new law, HB 1243, a person may carry a concealed weapon on campus if they meet two distinct

criteria: first, they have to be a “staff member,” and fit the definition of “a person who is not enrolled as a full-time student [...] and is either employed by the university, college, or community college full time or is on a nine-month or twelve-month appointment” at their respective institutions. The second criteria, however, places the onus on the administration of the institutions, requiring that the college or university must expressly “[disallow] the carrying of a concealed handgun [...] in the buildings or on the grounds of the institution” (p. 3). Furthermore, the policy which disallows the carrying of concealed handguns “expires one (1) year after the date of adoption and must be readopted each year by the governing board” of the institution. In other words, a policy that does allow staff members to carry concealed weapons on campus could last into perpetuity with little institutional maintenance. Institutions that choose to forbid the carrying of concealed weapons on campus, however, need to revisit the issue on a yearly basis. Although admittedly not as burdensome as Kansas’s requirements, the Arkansas law does create extra inconvenience for those institutions wishing to prevent staff members from carrying guns onto campus grounds. The same law, however, does prohibit “[t]he storage of a handgun in a university or college-operated student dormitory or residence hall” (p. 4).

The changes to the weapons policy at Liberty University, however, loosened some restrictions—for example, student employees are now allowed to carry weapons on campus and in campus facilities, so long as they have a valid concealed carry permit. The change also includes language so that

Faculty and staff members, such as Resident Directors, who live in residence hall apartments may store their approved weapons within a secured container in their dwelling unit but weapons may not otherwise be stored in residence halls.
(Section 3, Part C, “Liberty University Weapons Policy,” 2013).

This is the only substantive change in the policy. On the Liberty University Police Department's Web site, there is a list of other "institutions permitting students and others to have concealed weapons with state permit and/or campus police permission" ("Firearms on Campus," 2013). The list features primarily higher education institutions in Colorado and Utah, where legislation has been enacted, or court decisions have been made that forces administrators in these states to embrace policies that allow concealed carry permit holders near-unfettered access to campus grounds. In Utah, in particular, in the wake of the *University of Utah v. Shurtleff* (2006) decision, students were allowed to bring and store weapons into their dorm rooms (although later legislation would allow for the creation of "gun free" and "gun friendly" dorms).

Other Internal Factors

The changes in policy from 2011 onwards could be indicative of internal pressures as well. As noted earlier, Liberty University enjoys special cachet with conservative politicians and action groups, and an "anti-gun" policy would most likely force conservative politicians away from the campus if they are running for office.

Additionally, although initial applications for concealed carry on Liberty University's campus were rather low, it is possible that students, in particular, non-traditional students, were pressing for the changes. These students, which comprise a large portion of Liberty University's population, may have a greater desire or need to carry weapons for a variety of reasons, and some have been at the center of court cases. For example, in the *Florida Carry, Inc., v. University of North Florida* (2012) case, the non-traditional student, Alexandria Lainez, wanted "to carry a firearm while traveling to and from school as a lawful method of self-defense" (p. 3). Returning military veterans, too, have sought to have guns on campus for a variety of reasons

(Pesetski, Ofstein, Outlaw, & Brooks, 2014). These non-traditional students may be powering much of the current desire for weapons on campus.

There is, of course, additional precedent. Liberty University's founder, the Reverend Jerry Falwell, once encouraged viewers of his television program "to stand against leftist lawmakers and advocates who are resolved to eradicate our right to protect our families the way we see fit" ("Armed," 2001). On that same show, Falwell received from then NRA President Wayne LaPierre a lifetime membership in the NRA. Although Falwell died in 2007, it can be argued that, along with polishing Liberty University's conservative credentials, the administration at Liberty has sought to more closely align itself with the visions of its founder. This vision is itself no surprise, in that the chancellor and president of Liberty University is Jerry Falwell, Jr.

Conclusion

The initial change in Liberty University's weapons policy was a radical one; it metamorphosed from a paragraph-long statement on the police department Web site (a statement seemingly more concerned with water guns) to a much longer and more in-depth series of policies that defined who could have a weapon and where. This shift, which occurred in 2011, signaled a departure away from the mainstream of higher education weapons policies and could be interpreted as an embrace of conservative ideals and politics. In 2012, however, numerous state legislatures and courts began to relax strict gun policies on college campuses. Liberty University responded to shifts in national trends in 2013 allowing student employees, such as resident advisers, the ability to store their weapons in their dorm rooms, by continuing to follow the trend of states such as Colorado and Utah, who have granted, through legislation or court decision, the ability to approve students to carry their weapons throughout campus. By

examining Liberty University's shifting weapons policies, it becomes possible to decipher and understand how the national trends of policies about weapons on campus have evolved over time.

References

- 11 Va. Att’y Gen. Op. No. 11-078 (July 1, 2011).
- 2011 Wisconsin Act 35. (July 22, 2011). Retrieved from:
<https://docs.legis.wisconsin.gov/2011/related/acts/35.pdf>
- An act concerning firearms, dealing with personal and family protection act. S Sub for H.B. 2052, Kansas Legislature (2013).
- An act to allow trained and licensed staff and faculty to carry a concealed handgun on a university, college, or community college campus under certain circumstances; and for other purposes. H.B. 1243, 89th General Assembly, State of Arkansas (2013).
- Armed and dangerous? Falwell receives life membership in NRA. (2001). *Church & State*, 54(2), 17.
- Bartlett, D. (Feb. 5, 2013). Gun free no more? *The Liberty Champion*. Retrieved from:
<https://www.liberty.edu/champion/2013/02/gun-free-no-more/>
- Concealed-carry gun ban for public universities could be on the 2014 Colorado ballot. (January 23, 2014). *The Huffington Post*. Retrieved from:
http://www.huffingtonpost.com/2014/01/02/safe-campus-colorado_n_4532091.html
- DiGiacinto v. Rector & Visitors of George Mason University*. (2010). 281 Va. 127 704 S.E.2d 365.
- District of Columbia v. Heller*. (2008). 554 U.S. 570.
- Firearms on campus. (2007). *Liberty University Police Department*. Retrieved from:
<http://web.archive.org/web/20070520194342/http://www.liberty.edu/index.cfm?pid=4153>
- Firearms on campus. (2011). *Liberty University Police Department*. Retrieved from:
<http://web.archive.org/web/20111122024150/http://www.liberty.edu/index.cfm?pid=4153>
- Firearms on campus. (2013). *Liberty University Police Department*. Retrieved from:
<http://www.liberty.edu/index.cfm?pid=4153>
- Florida Carry, Inc. v. University of North Florida. No. 1D12-2174*. (2013).
- Harnisch, T. L. (November 2008). *Concealed weapons on state college campuses: In pursuit of individual liberty and collective security*. American Association of State Colleges and Universities. Retrieved from:
<http://www.aascu.org/WorkArea/DownloadAsset.aspx?id=4545>

- LaPoint, L.A. (2010). The up and down battle for concealed carry at public universities. *Journal of Student Affairs*, 19, 16.
- “Liberty University.” IPEDS Data Center. U.S. Department of Education. Institute of Education Sciences, National Center for Education Statistics.
- Liberty University students, staff, apply for gun carry permits. (Dec. 30, 2011). *WJLA.com*. Retrieved from: <http://www.wjla.com/articles/2011/12/liberty-university-students-staff-apply-for-gun-carry-permits-70875.html/>
- Liberty University weapons policy. (2013). Retrieved from: <http://www.liberty.edu/index.cfm?pid=4153>
- McDonald v. City of Chicago* (2010). 561 U.S. 3025.
- Mitchell v. University of Kentucky* (2012). 2010-SC-000762-TG.
- Pesetski, C., Ofstein, J., Outlaw, S., and Brooks, R. (2014). Veteran transfer students and concealed weapons on campus. *Journal of Cases in Educational Leadership* (17)3, 33-47.
- Regents of the University of Colorado v. Students for Concealed Carry on Campus*. 2012 CO 17. 10SC344.
- Roose, K. (2009). *The unlikely disciple: A sinner’s semester as America’s holiest university*. New York: Grand Central Publishing.
- Strong, Ted. (January 13, 2013). UVa replaces weapons policy. *The Daily Progress*. Retrieved from: http://www.dailyprogress.com/news/uva-replaces-weapons-policy/article_9f1025c9-cd7d-5941-9000-3be6bfea3d04.html
- University of Utah v. Shurtleff*. (2006). 252 F.Supp.2d 1264
- Wasserman, L. M. (2011). Gun control on college and university campuses in the wake of *District of Columbia v. Heller* and *McDonald v. City of Chicago*. *Virginia Journal of Social Policy & the Law*, 19(1), 1-57.