

Court left little air in its conclusion in *Ortiz v. Commonwealth*, 681 A.2d 152, 156 (Pa. 1996), that the regulation of firearms is to be done at the state, not local, level.

I write separately, as did Senior Judge Leadbetter recently, recognizing “that local conditions may well justify more severe restrictions than are necessary statewide.” *City of Philadelphia v. Armstrong*, 271 A.3d 555, 569 (Pa. Cmwlth. 2022) (Leadbetter, S.J., concurring). As she eloquently stated, “[i]t is neither just to impose unnecessarily harsh limits in communities where they are not required nor consistent with simple humanity to deny basic safety regulations to citizens who desperately need them.” *Id.* The novel constitutional arguments raised by Petitioners may provide a basis for “our Supreme Court to reconsider the breadth of the *Ortiz* doctrine¹ and allow for local restrictions narrowly tailored to local necessities.” *Id.* (footnote omitted).



RENÉE COHN JUBELIRER, Judge