

February 26, 2018

Mortimer J. Buckley
President and Chief Executive Officer
Vanguard Group
100 Vanguard Boulevard V26
Malvern PA 19355

Dear Mr. Buckley:

I urge you to use your financial leverage as a major gun company shareholder to encourage more responsible actions by these companies.

On February 14, 2018, a 19-year old gunman opened fire on students, teachers, and staff at Marjory Stoneman Douglas High School in Parkland, Florida, killing 17 people and injuring at least 14 others. The gunman's weapon of choice was the AR-15 rifle. AR-15-style rifles were also used to kill dozens in recent mass shootings in Newtown, San Bernardino, Orlando, Sutherland Springs, and Las Vegas.²³

Gun violence has become an epidemic in America. Since the start of 2018, there have been 34 mass shootings in the United States.²⁴ The headlines are fewer, but gun violence also occurs every day on streets, playgrounds and homes across this country. According to the Gun Violence Archive, guns have already claimed the lives of over 2,200 people, including 86 children, this year.²⁵

The AR-15 rifle used in the Parkland murders is manufactured by Smith & Wesson, a subsidiary of the publicly traded American Outdoor Brands Corporation (AOBC). Vanguard holds the third largest stake in AOBC.²⁶ Vanguard is also the second largest shareholder in Sturm, Ruger & Company,²⁷ and the third largest shareholder in a third publicly traded gun manufacturer, Vista Outdoors.²⁸ Sturm Ruger and Vista Outdoors also manufacture similar weapons.²⁹

²³ Los Angeles Times, Mass Shootings are Getting Deadlier. And the latest ones all have something new in common: The AR-15 (Feb. 14, 2018) (<http://www.latimes.com/nation/la-na-ar-15-story.html>).

²⁴ Gun Violence Archive (accessed Feb. 23, 2018) (<http://www.gunviolencearchive.org/>).

²⁵ Gun Violence Archive (accessed Feb. 23, 2018) (<http://www.gunviolencearchive.org/>).

²⁶ CNN Money, Top 10 Owners of American Outdoor Brands Corp) (accessed February 23, 2018) (<http://money.cnn.com/quote/shareholders/shareholders.html?symb=AOBC&subView=institutional>).

²⁷ CNN Money, Top 10 Owners of Sturm, Ruger, & Company, Inc.) (accessed February 23, 2018) (<http://money.cnn.com/quote/shareholders/shareholders.html?symb=RGR&subView=institutional>).

²⁸ CNN Money, Top 10 Owners of Vista Outdoor Inc.) (accessed February 23, 2018) (<http://money.cnn.com/quote/shareholders/shareholders.html?symb=VSTO&subView=institutional>).

²⁹ For example, Sturm Ruger manufactures the AR-556, described by American Rifleman as "an entry-level AR-15 carbine that's definitely ready to give the other budget ARs on the market a run for their money," the


This means that your company directly benefits from sales of weapons, including those that are used in violent assaults. In a terrible twist, “stock prices of gunmakers often rise after mass shootings.”³⁰ For example, after the shooting in Las Vegas, which left 58 dead and over 850 injured, stock in AOBC rose by over 3%. Following the slaughter of students and staff in Parkland, AOBC’s stock rose as much as 4.5%,³¹ and “[h]istory shows that Sturm Ruger and American Outdoor Brands rise 1.6 percent and 2.2 percent, respectively, five days after a mass shooting.”³²

I encourage you take action to ensure that the gun companies in which you invest are taking steps to reduce gun violence. There are numerous ways in which these companies can act. Gun companies can establish tougher self-regulation to ensure that the retail outlets that sell their products impose their own requirements (such as higher minimum age requirements for purchase of weapons, or requiring waiting periods prior to purchase). They can direct company research towards the development of safer weapons and violence reduction. They can take additional actions in conjunction with their distributors, retailers, and other business partners. None of these actions would substitute for action by the federal government, but each would help reduce gun violence.

Your company is in a powerful position. You have reaped significant benefits from your investment in gun manufacturers, but have done little to reduce the violence and murders caused by their products. I urge you to begin to use your vast investment in gun manufacturers to prevent gun violence.

I ask that you brief my staff on your plans for action no later than March 9, 2017.

Sincerely,



Elizabeth Warren
United States Senator

weapon that was used in the November 2017 Sutherland, Springs, Texas church massacre. (*American Rifleman*, AR-556 (Dec. 15, 2014) (<https://www.americanrifleman.org/articles/2014/12/15/ruger-ar-556/>); *CNN*, What we know about the rifle used in the Texas church massacre (Nov. 6, 2017) (<http://money.cnn.com/2017/11/06/news/companies/ruger-ar-556-ar-15/index.html>)). Savage Arms, a subsidiary of Vista Outdoors, "announced that it is now in the AR, or MSR, business, introducing four models simultaneously," in January 2017 (*American Rifleman*, Savage Arms Introduces Its First AR Rifles (Jan. 3, 2017) (<https://www.americanrifleman.org/articles/2017/1/3/savage-arms-introduces-its-first-ar-rifles/>)).

³⁰ CNBC, Smith & Wesson's parent company closes higher after the Florida shooting (Feb. 15, 2018) (<https://www.cnbc.com/2018/02/15/gun-stocks-are-rallying-as-they-usually-do-after-a-mass-shooting.html>).

³¹ CNBC, Smith & Wesson's parent company closes higher after the Florida shooting (Feb. 15, 2018) (<https://www.cnbc.com/2018/02/15/gun-stocks-are-rallying-as-they-usually-do-after-a-mass-shooting.html>).

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