**Below is an IRAC (Issue-Rule-Application-Conclusion) breakdown of the case Firearms Policy Coalition, Inc. v. Bondi (N. D. Tex., Sept. 30, 2025).**

Issue

Does 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(1), which prohibit carrying firearms in post offices and on postal property, violate the Second Amendment as applied to private individuals carrying firearms for self-defense in ordinary U.S. post offices (i.e. not on military bases or in areas with armed security)?

Rule

      1.    Second Amendment / Bruen Framework

      •     Under New York State Rifle & Pistol Ass’n v. Bruen, courts first ask whether the conduct (carrying a firearm) falls within the “plain text” of the Second Amendment. If yes, the government must show that the challenged regulation is consistent with the historical tradition of firearm regulation.

      •     The government’s historical justification must be based on “relevantly similar” analogues, considering both why and how restrictions were imposed historically. Modern regulations need not be exact replicas, but must align with underlying principles of historical analogues.

      2.    “Sensitive Places” Doctrine

      •     Some longstanding, permissible restrictions exist for “sensitive places” (e.g. government buildings, schools, courthouses). The government asserts post offices qualify.

      •     But the government must still show historical support for treating post offices as “sensitive places” in the sense justifying total bans on firearms.

      3.    As-Applied vs Facial Challenge

      •     Because the challenged laws reach more than firearms (they also cover explosives, weapons broadly), the court treats the challenge as as-applied to firearm carry in ordinary post offices.

      4.    Limitations on Property Owner Argument

      •     The government argues that because it owns postal property, it can restrict firearms under the Property Clause. But the court rejects that this gives carte blanche to evade Second Amendment constraints.

Application

      1.    Plain Text Coverage

      •     Plaintiffs’ desire to carry firearms for self-defense inside a post office is conduct covered by the Second Amendment’s “keep and bear arms” right (i.e. within the plain text). The regulation prohibits “bearing” (i.e. carrying) firearms in those locations.

      •     Thus, the burden shifts to the government to justify its prohibition via historical analogy under Bruen.

      2.    Historical Analogues and Tradition

      •     The court finds no historic regulation from the founding era or early Republic that imposed a blanket ban of firearms in postal facilities or post offices.

      •     Although early mail and post offices existed, Congress historically addressed threats to postal service (e.g. mail robbery laws) through criminal penalties on misuse of weapons, not blanket bans.

      •     The fact that restrictions on firearms in post offices did not appear until the 20th century (USPS regulation in 1972; general federal building firearm bans in 1964) suggests the prohibition is a modern invention without deep roots in the Second Amendment tradition.

      •     The government’s argument that post offices are by definition “sensitive places” fails because the plaintiffs show historic analogues for truly sensitive places (courthouses, legislative assemblies) differ in function and context. The court finds the government did not sufficiently demonstrate that post offices historically were treated equivalently.

      3.    Rejection of Property-Owner Justification

      •     The court rejects the property-owner argument that governmental ownership of post offices exempts them from Second Amendment constraints. The government cannot circumvent constitutional scrutiny simply by owning the property.

      •     Cases cited by the government are either pre-Bruen, unpublished, or do not support the proposition that property ownership overrides Second Amendment limitations.

      4.    Remedy and Scope

      •     Because Plaintiffs succeed on the merits, they are entitled to declaratory relief that the statutes/regulations are unconstitutional as applied in ordinary post offices.

      •     The court also grants a permanent injunction preventing enforcement of § 930(a) and § 232.1(1) against Plaintiffs (and their members) in ordinary post offices (excluding restricted areas like military bases or buildings with armed security).

Conclusion

The court holds that 18 U.S.C. § 930(a) and 39 C.F.R. § 232.1(1), insofar as they ban the possession and carrying of firearms in ordinary post offices and on postal property, are unconstitutional as applied under the Second Amendment. It grants Plaintiffs summary judgment, issues declaratory relief, and permanently enjoins enforcement of the firearm bans in ordinary postal settings against them.