

MATTHEW J. PLATKIN, Attorney General of
the STATE OF NEW JERSEY,

Plaintiff,

v.

PATRIOT ENTERPRISES WORLDWIDE
LLC *doing business as* EAGLE SHOWS and
NOT AN LLC *doing business as* JSD SUPPLY,

Defendants.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION –
MERCER COUNTY

DOCKET NO.: C-93-23

Civil Action

FILED

December 12, 2023

COMPLAINT

**SUPERIOR COURT OF NJ
MERCER VICINAGE
CHANCERY**

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The New Jersey Attorney General (the “Attorney General”), by and through undersigned counsel, hereby alleges as follows against Defendants Patriot Enterprises Worldwide LLC d/b/a Eagle Shows (“Eagle Shows” or “Eagle”) and Not An LLC d/b/a JSD Supply (“JSD Supply” or “JSD” and, collectively, “Defendants”):

INTRODUCTION

1. The Attorney General brings this action to stop and remedy Defendants’ unlawful sale to New Jersey residents of products designed to create unserialized, untraceable firearms—commonly known as “Ghost Guns.” Defendants, who know full well that Ghost Guns are illegal in New Jersey, deliberately sell their products at gun shows just across the New Jersey–Pennsylvania border. They do so to make Ghost Guns readily accessible to New Jersey residents—even though such weapons have been illegal in New Jersey for years.

2. Defendant JSD sells kits, frames, and other parts for making Ghost Guns. At the point of sale, JSD does not conduct background checks or require buyers to demonstrate that they are not disqualified from purchasing or possessing a firearm. Moreover, at gun shows, JSD often processes sales in all-cash transactions that leave little or no purchase record. The JSD website boasts: “Thanks to our products, you can put together a firearm that is identical to options available straight from the manufacturer. The custom handgun you build from our . . . kit looks, feels and operates just like any other gun. But they don’t require a background check or a serial number.”¹ Defendants’ common owner, Jordan Vinroe, touts the fact that JSD’s proprietary Ghost Gun is “super easy to put together.”²

¹ See Polymer 80 Parts and Kits, JSD Supply, <https://jsdsupply.com/brand/polymer-80> (last visited Dec. 10, 2023) (emphasis added).

² Is It Local, Ep. 10 | Jordan Vinroe - JSD Supply, YouTube, at 41:00 (Oct. 9, 2020), <https://www.youtube.com/watch?v=zePZxR9uFlo> [hereinafter “Is It Local Interview”]. All quoted language in this complaint is quoted in relevant part.

3. Defendant Eagle Shows hosts gun shows (“Eagle Gun Shows”) deliberately set up just across the New Jersey–Pennsylvania border, at which Defendant JSD and other Ghost Gun product vendors sell their products to New Jersey residents. Vinroe has stated publicly that the New Jersey market is a prime target for JSD’s sale of Ghost Gun kits, frames, and other parts.

4. Defendants’ lack of point-of-sale controls means that felons, convicted sex offenders, minors, people subject to domestic violence restraining orders, and others who cannot legally own, possess, or purchase a gun—as well as traffickers of illegal guns—can easily acquire lethal weapons. To do so, they need only purchase parts from JSD and/or through other Eagle Shows vendors, and then assemble the guns themselves. Indeed, using nothing more than a simple drill and an online video, anyone can quickly assemble these products into fully functional guns. The products Defendants and other vendors at Eagle Gun Shows make available are, in fact, specifically designed to be assembled quickly into fully functional Ghost Guns.

5. Ghost Guns are fast becoming a weapon of choice for illegal gun traffickers and violent felons. Though a relatively new technology, Ghost Guns already represent approximately 8 percent of all guns recovered in New Jersey in connection with crimes. That percentage has quadrupled since 2020.

6. Because of Ghost Guns’ unique dangers, New Jersey has responded to the threat posed by Ghost Guns by building upon the State’s longstanding criminal prohibitions against firearms with a defaced serial number. See N.J.S.A. 2C:39-3(d), 2C:39-9(e).

7. In 2018, New Jersey criminally prohibited purchasing kits and frames to make Ghost Guns. N.J.S.A. 2C:39-9(k). In 2019, New Jersey criminally prohibited completed Ghost Guns. N.J.S.A. 2C:39-3(n), 2C:39-9(n). And, since 2022, any entity that contributes to a public

nuisance by violating such laws, or that fails to institute reasonable controls in their sale of Ghost Guns kits or any other Ghost Gun parts, is civilly liable to the State. N.J.S.A. 2C:58-35.

8. Notwithstanding these laws, Defendants actively market and sell to New Jersey residents parts to make untraceable Ghost Guns—without checking their purchasers’ residency, age, felony status, or qualifications to purchase or possess a firearm—and without filtering out traffickers making multiple purchases.

9. Defendants’ actions knowingly violate New Jersey law and are otherwise tortious. Their conduct has contributed and is contributing to a dangerous public nuisance in the State of New Jersey. The Attorney General therefore now brings this action to put a stop to this unlawful and dangerous activity.

NATURE OF THE ACTION

10. Defendants JSD Supply and Eagle Shows, both headquartered in Western Pennsylvania, are owned and operated by the same individual, Jordan Vinroe.

11. Vinroe founded JSD Supply in 2013. JSD quickly became a regular vendor at Eagle Shows, which was then separately owned. From the start, JSD’s principal business strategy has been the marketing and sale of products to make untraceable Ghost Guns. In the words of JSD’s website in August 2022: “JSD was founded in a love of guns and hate of paperwork. Since 2013, we’ve helped thousands of people build their own gun from the privacy of their garage. No serialization, no background check, no government fee.”³

12. In 2021, after Eagle Shows began facing scrutiny about its vendors’ sales to gun traffickers, Eagle announced that it would ban the sale of Ghost Gun kits and frames at its shows.

³ About Us, JSD Supply, Aug. 8, 2022, <https://web.archive.org/web/20220808020500/https://jsdsupply.com/about-us>.

In response, Vinroe led a successful pressure campaign for Eagle to reverse course. A few months later, Vinroe formed a new business entity and purchased Eagle, eliminating any risk of Eagle's owners ever again interfering with the lucrative Ghost Gun marketplace at Eagle Gun Shows.

13. Vinroe's acquisition of Eagle Shows not only gave JSD the uninterrupted ability to continue selling its Ghost Gun products at Eagle Gun Shows, but also created an integrated Ghost Gun enterprise.

14. Since coming under common ownership, Defendants JSD Supply and Eagle Shows have been able to coordinate and synergize multiple layers of the business of deliberately distributing Ghost Gun kits, frames, and other parts into New Jersey.

15. JSD has brought to that integrated enterprise what Vinroe has described as the largest retailer of Ghost Gun frames in the country. But that is not all: JSD also has manufactured and sold the Vinroe-patented Modular Universal Pistol ("MUP-1"), which serves as the frame for a Ghost Gun clone of the popular Sig Sauer 320 gun, as well as a "jig" that makes it particularly easy for JSD's customers to finish their Ghost Guns.

16. By acquiring Eagle Shows, Vinroe has also gained control of gun-product bazaars held year-round in Pennsylvania locales near the New Jersey border. Vinroe has oriented those Eagle Gun Shows toward Ghost Gun product sales, and has moved them even closer to the New Jersey border. He advertises those shows in New Jersey. Vinroe has thereby ensured his control over the point of sale for multiple Ghost Gun product vendors selling to New Jerseyans.

17. Vinroe also has prominently positioned JSD's retail booths and products to stand out among the many vendors at Eagle Gun Shows—up to 1500 vendors at the largest show.

18. Defendants’ marketing message to their customers makes it clear that they expect customers to use their products to make Ghost Guns, and that the principal selling points for their products include that they are (1) untraceable, (2) do not require a background check to purchase, and (3) are otherwise identical to “name brand” firearms.

19. In short, Defendants, acting in concert, operate as a major player—perhaps the dominant player—in the market for Ghost Guns in New Jersey, deeply involving themselves in the manufacture, distribution, marketing, and sale of the parts needed to create untraceable firearms.

20. Defendants’ conduct endangers New Jerseyans and is illegal. New Jersey law criminally prohibits individuals in the State from obtaining a finished or unfinished unserialized frame with the purpose to make a Ghost Gun, and also prohibits a person from possessing, selling, or transporting a completed Ghost Gun. N.J.S.A. 2C:39-9(k); 2C:39-3(n); 2C:39-9(n). Nevertheless, Defendants promoted, facilitated, solicited, and aided New Jerseyans in purchasing frames (finished and unfinished) to make Ghost Guns and in possessing, transporting, and trafficking completed Ghost Guns. Defendants’ conduct thus violates the law under longstanding principles of accomplice liability. N.J.S.A. 2C:2-6. Further, New Jersey law holds civilly liable any entity that violates such laws or fails to institute reasonable controls in the selling of any Ghost Gun part. N.J.S.A. 2C:58-35(a).

21. As Vinroe himself boldly explained in an October 2020 podcast, he considers New Jersey’s gun laws a particularly good business opportunity for JSD: “What’s really good is when you get closer to places that are very restrictive, so a New Jersey, New York, Connecticut,

Washington State. Anywhere where their gun laws are very strict, is where you see people wanting products the most.”⁴

22. Vinroe has exploited this opportunity by perching Defendants’ points of sale just across the border in Pennsylvania, and then consciously luring large numbers of New Jersey buyers, including through placing billboards for Eagle Gun Shows on the New Jersey Turnpike.

23. Defendants’ Ghost Gun-related sales have thus put Ghost Guns into the hands of particularly dangerous New Jersey residents, and contributed to a burgeoning Ghost Gun public nuisance in our State.

24. While some of Defendants’ purchasers have been arrested in New Jersey and their products confiscated, many others are still at large and either remain in possession of illegal products acquired from or through Defendants or have since trafficked such products.

25. Defendants, acting in concert via their common ownership, have thereby jeopardized, and continue to jeopardize, the health and safety of all New Jerseyans, in order to exploit what they see as a lucrative business opportunity.

26. The Attorney General therefore brings this Action to seek all authorized and appropriate relief against Defendants.

PARTIES

27. Plaintiff is the Attorney General of the State of New Jersey. The Attorney General is authorized and charged with the responsibility to enforce N.J.S.A. 2C:58-35 (“Section 58-35”). The Attorney General brings the claims under Section 58-35 by and through the Statewide Affirmative Firearms Enforcement Office (“SAFE”). SAFE was created within the Office of the Attorney General by Attorney General Administrative Executive Directive No.

⁴ Is It Local Interview, at 15:06.

2022-08, which also delegates to SAFE the Attorney General's statutory authority under Section 58:35.

28. The Attorney General also asserts in this case the State's proprietary interest and, under the Attorney General's parens patriae authority, New Jersey's "quasi-sovereign" interests in protecting the safety, health, and welfare of its residents.

29. Defendant Not An LLC d/b/a JSD Supply is a Pennsylvania limited liability company with a registered office of 106 Poplar Lane, Portersville, Pennsylvania 16051. The fictitious name "JSD Supply" is registered as a Pennsylvania business with a principal address of 1052 New Castle Road, Prospect, Pennsylvania 16052, and the registration identifies JSD Supply's owner as Jordan Vinroe of 106 Poplar Lane, Portersville, Pennsylvania 16051. Public records indicate that Vinroe is associated with 106 Poplar Lane, Portersville, Pennsylvania 16051 in his personal capacity.

30. JSD Supply is a leading manufacturer and retailer of Ghost Gun kits, Ghost Gun frames, and other Ghost Gun parts.

31. Defendant Patriot Enterprises Worldwide LLC d/b/a Eagle Shows is a Pennsylvania limited liability company with a registered office of 106 Poplar Lane, Portersville, Pennsylvania 16051. The fictitious name "Eagle Shows" is registered as a Pennsylvania business with a principal address of 106 Poplar Lane, Portersville, Pennsylvania 16051.

32. Eagle Shows describes itself as the "home of the largest gun shows in the Keystone State."⁵

33. Non-Party Jordan Vinroe has held himself out as the owner of both JSD Supply and Eagle Shows.

⁵ Eagle Shows, <https://eagleshows.com> (last visited Dec. 10, 2023).

JURISDICTION AND VENUE

34. This Court's jurisdiction is proper because the action arises from the Defendants' deliberate targeting of New Jersey residents and Defendants' regular, repeated, and systematic contacts with New Jersey. Defendants have also engaged in intentional acts calculated to create an actionable event in the New Jersey forum, and could reasonably anticipate being haled into court in New Jersey.

35. Defendants have, in particular, deliberately solicited New Jersey residents for their business, and have knowingly sold Ghost Gun products to New Jersey residents, who foreseeably return with them to New Jersey. This course of business has included placing billboard advertisements in New Jersey targeting New Jersey residents, a webpage specifically directed at New Jersey residents, and emails to New Jersey residents who have provided their physical and email addresses to Defendants.

36. For example, Defendants advertised their October 2023 and August 2023 Eagle Gun Shows on a billboard at milepost 70.2 on the New Jersey Turnpike:



37. Defendants also advertised their October 2023 and March–April 2023 Eagle Gun Shows on a billboard above South Crescent Boulevard, in Pennsauken, New Jersey, less than five miles from the Pennsylvania border:



38. Vinroe has admitted that he deliberately sets up shop near the New Jersey border because New Jersey is a jurisdiction “where you see people wanting [JSD’s] products the most.”⁶

39. Through their targeted solicitation of New Jersey residents, Defendants have purposely availed themselves of this New Jersey forum and accordingly had fair warning that their activities could subject them to New Jersey courts’ jurisdiction.

40. Pursuant to R. 4:3-2(a)(2) of the New Jersey Court Rules, venue is proper in this Court because the causes of action alleged herein arose in Mercer County, into which Defendants’ Ghost Gun products were transported and prepared for resale.

FACTS

I. Defendants’ Ghost Gun Products

A. Ghost Guns

41. Ghost Guns are firearms⁷ that lack a serial number on their frame or receiver. Generally speaking, a frame is the part of a handgun that houses internal components, such as the trigger mechanism. A receiver is the analogous part of a rifle. The terms are sometimes used interchangeably and, unless otherwise noted, the use of the term “frame” in this Complaint encompasses a “receiver,” and vice versa. Frames and receivers are sometimes also referred to as a firearm’s “lower.”

⁶ Is It Local Interview, at 15:06.

⁷ The relevant portion of the New Jersey statutory definition of “firearm” is “any handgun, rifle, shotgun, machine gun, automatic or semi-automatic rifle, or any gun, device or instrument in the nature of a weapon from which may be fired or ejected any solid projectable ball, slug, pellet, missile or bullet, or any gas, vapor or other noxious thing, by means of a cartridge or shell or by the action of an explosive or the igniting of flammable or explosive substances.” N.J.S.A. 2C:39-1(f). Other jurisdictions’ definitions of “firearm” may differ.

42. In New Jersey, as elsewhere, it is a crime to sell a Ghost Gun.

N.J.S.A. 2C:39-9(n). It is also a crime in New Jersey to knowingly possess a Ghost Gun.

N.J.S.A. 2C:39-3(n).

43. These prohibitions against Ghost Guns reflect law enforcement and regulatory authorities' strong interest in firearms serialization. Serialization aids in interdicting and investigating gun crime, and has a strong deterrent effect on the commission of crimes with guns. Thus, since long before Ghost Guns began to proliferate, it has been a crime in New Jersey to possess a firearm with a defaced serial number. N.J.S.A. 2C:39-3(d).

44. Ghost Guns' lack of serialization generally renders law enforcement unable to trace Ghost Guns to their sellers or purchasers. This impedes policing and investigation; hinders deterrence; and attracts, in particular, those purchasers and possessors who are prohibited by law from acquiring a firearm, or who want a gun to aid in other crime.

45. Ghost Guns sell for more money than comparable serialized, fully assembled firearms because Ghost Gun product sales do not require a background check and the weapons themselves cannot be traced.⁸

46. All this combines to make Ghost Guns particularly dangerous and costly to the New Jersey public.

B. To Elude Restrictions on Completed Ghost Guns, the Ghost Gun Industry Sells Ghost Gun Parts

47. To serve (and profit from) the market for Ghost Guns while evading prohibitions on selling completed Ghost Guns, members of the Ghost Gun industry—including Defendants—

⁸ Glenn Thrush, Ghost Guns: Firearm Kits Bought Online Fuel, Epidemic of Violence, N.Y. Times, Nov. 14, 2021, <https://www.nytimes.com/2021/11/14/us/ghost-guns-homemade-firearms.html>.

sell the constituent parts of Ghost Guns (“Ghost Gun Parts”) for their customers to then assemble into working firearms. This is a core element of Defendants’ businesses.

48. JSD and other Eagle vendors sell Ghost Gun Parts as both standalone, separate products and in various combinations. In particular, JSD (and others) have sold unfinished, unserialized frames (“Ghost Gun Frames”) for making Ghost Guns, including as part of “Ghost Gun Kits.” Under New Jersey law, purchasing a Ghost Gun Frame is illegal, too. N.J.S.A. 2C:39-9(k).

49. More recently, JSD has marketed Ghost Gun Parts bundles, designed to be used with a Ghost Gun Frame built by the user at home using a 3D printer, i.e., a commercially available printer that can use digital instructions to create a three-dimensional physical object from thin layers of plastic or other material.

1. Ghost Gun Frames

50. Ghost Gun Frames are unserialized firearm frames or receivers.

51. When JSD and Eagle’s other Ghost Gun vendors sell Ghost Gun Frames, they do so in unfinished form. The unfinished frames require minor steps—additional drill holes, bending, or milling—to be ready for use in a gun. The products are designed for users to finish the frames themselves. The end result is a usable, unserialized frame.

52. In a December 2020 interview, Vinroe claimed to be the largest retailer of Ghost Gun handgun Frames in the country.⁹

53. The unfinished nature of Defendants’ Ghost Gun Frames is distinct from the other Ghost Gun Parts sold by JSD and/or through Eagle. Other Ghost Gun Parts, such as slides,

⁹ John Crump Live, Fireside Chats 154: Jordan Vinroe - JSD Supply, at 27:40 (Dec. 15, 2020), <https://podcast.crumpy.com/e/fireside-chats-154-jordan-vinroe-jsd-supply-more-p80-information>.

barrels, triggers, and magazines, are ready at the time of sale for assembly into, and use in, a functional firearm without requiring user alteration.

54. The unfinished nature of Ghost Gun Frames is the purported basis for Defendants' unique approach to them, as unfinished Ghost Gun products may be subject to different treatment from finished Ghost Gun products by other jurisdictions.

55. Although unfinished, Defendants' Ghost Gun Frames are designed to make finishing by customers easy, even for a novice, using household tools. Defendants further assist in this process by telling their purchasers which specific tools (such as drill bits) are needed for the finishing, and in fact providing those tools. Defendants provide "how-to" instructional materials as well.

56. To make the process even easier, JSD and other Eagle vendors have provided customers with "jigs"—manufacturer-designed and manufacturer-issued bracketing that marks and lines up the drill holes and secures the unfinished frame in place.

57. By way of illustration, JSD and other Eagle vendors have sold Ghost Gun Frames made by the leading manufacturer of such products, Polymer80. Those frames are pieces of plastic molded to nearly perfectly resemble the grip portion of a Glock handgun, i.e., its entire "lower." The retailers have sold, alongside or included within the frame, a red plastic jig that enables users to envelop the unfinished frame with bracketing that contains openings showing where the user needs to drill holes. The retailers also have provided drill bits that correspond to those holes. Such kits can be seen on the Polymer80 website, for example this model with a molded black frame:¹⁰

¹⁰ PF940V2 80% Full Size Frame Kit - Gray, Polymer80, https://www.polymer80.com/PF940v2-80-Full-Size-Frame-Kit-Gray_2 (last visited Dec. 10, 2023).



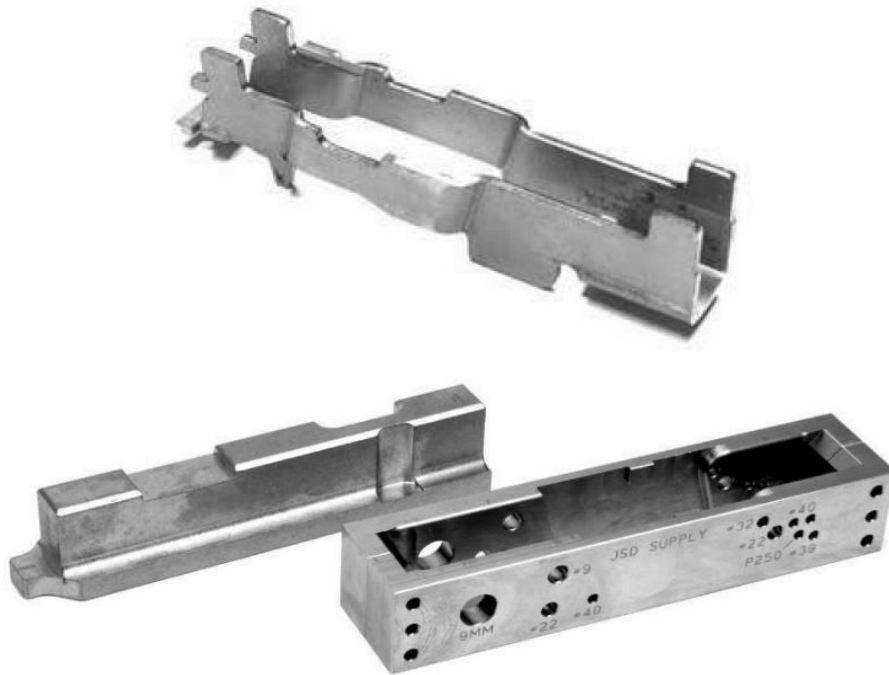
58. Polymer80’s website provides complete instructions on how to use these tools to finish the Ghost Gun Frame, and then join the Ghost Gun Frame with other Ghost Gun Parts, to make a working Ghost Gun.¹¹

59. Another example is JSD’s proprietary MUP-1 Ghost Gun Frame (“MUP-1 Frame”), designed to make a Ghost Gun clone of the popular Sig Sauer P-320 handgun. The MUP-1 Frame is a cast or molded piece of stainless steel that closely resembles a Sig Sauer handgun’s “Fire Control Unit.” The jig is steel and has a lid to hold the MUP-1 Frame in place. The jig has labeled holes corresponding to where users are to drill or mill. Defendants have posted instructional materials, including videos, showing how that finishing is done. As Vinroe

¹¹ How To, Polymer80, <https://www.polymer80.com/how-to-manuals> (last visited Dec. 10, 2023).

explained in an interview: “You gotta drill some holes and bend those tabs that are sticking up, that’s what would make the rail that a slide would go on.”¹²

60. JSD’s MUP-1 Frame (top image) and its finishing jig (bottom image) can be found below:



2. Ghost Gun Kits

61. JSD and others at Eagle Gun Shows have often sold Ghost Gun Frames as part of Ghost Gun Kits. Ghost Gun Kits are combination packages of Ghost Gun Frames along with tools to make finishing easy, often combined with certain other Ghost Gun Parts needed to finish and assemble a Ghost Gun.

62. In addition to selling Ghost Gun Kits, JSD and others at Eagle Gun Shows also sell (or have sold) all types of Ghost Gun Parts separately or in other types of combinations.

63. Many of Defendants’ Ghost Gun Kits have included every tool and part needed to readily make a Ghost Gun. In this way, buying Defendants’ Ghost Gun Kits has been like

¹² Is It Local Interview, at 37:37.

buying furniture from a store like IKEA: the purchaser buys all the parts needed to make the finished product, but assembles it themselves. Just as it is commonly understood that IKEA sells furniture (rather than “furniture kits”), Vinroe has said that, when speaking colloquially, he tells people that he sells “firearms,” not kits.¹³

3. Ghost Gun Products for 3D-Printed Frames

64. JSD Supply also sells product bundles that include every Ghost Gun Part except the frame. To support those sales, JSD explicitly targets its marketing message at purchasers who will use a 3D printer to make their own frame for the Ghost Gun, with Ghost Gun product vendors supplying the remaining parts.

65. JSD’s website boasts:

A 3D printed gun frame can be the perfect way to enter the hobby of homemade guns while giving you a quality firearm you can be proud of on the range. Additive manufacturing, often referred to as 3D printing, lets you build a professional-looking frame at home, then finish it with your labor and the right 3D gun parts for a tailor-made shooting experience. . . . We’re proud to offer the parts you need to turn your 3D printed gun frame into a functional firearm you can depend on.¹⁴

66. In September 2023, JSD’s email newsletter touted a particular bundle of Ghost Gun Parts known as the “Avidity Arms PD10 Complete Parts Set.” It said: “The 3DPD10 Parts Kit includes every part needed to complete a build on a printed 3DPD10 Frame, using the file released by Avidity Arms through DefCad.com. This is the first time a traditional firearms manufacturer has released a printing optimized frame file to the gun making community!”

¹³ Is It Local Interview, at 6:47.

¹⁴ 3D Printed Gun Frames & Accessories, JSD Supply, <https://jsdsupply.com/category/3d-printed-gun-frames/> (last visited Dec. 10, 2023) (emphasis added).

67. The email included a picture of the completed Ghost Gun that can be readily built from the Avidity Arms PD10 Complete Parts Set:



68. To complement their business line in Ghost Gun Parts exclusive of frames, JSD has actively promoted the 3D printing of frames, i.e., the final piece of the puzzle for assembling a working Ghost Gun. For example, last year, JSD hosted the “JSD Invitational”—a design competition for making Ghost Guns out of 3D-printed Ghost Gun Frames and JSD Ghost Gun Parts.

69. JSD summarized the terms of the competition on the social media platform then known as Twitter: “16 competitors, 3d printed glock style frames being judged on cosmetic changes, \$5,000 in prize money, \$7,500 in parts sent to competitors.”

70. The invitational had a bracket:



71. Vinroe has described 3D printing as an increasingly inexpensive way to make Ghost Gun Frames at scale. In an August 2021 interview, Vinroe stated:

It's just getting cheaper and cheaper and better too, you know the next five years is going to be crazy with home building and 3D printing. . . . You figure [in addition to around \$300 for the printer] the filament is what, like twenty-five bucks for a spool, and I don't even know how many you can make—I just keep printing until it runs out and throw another one on so yeah, you can make like 10 receivers, like Glock-style pistols. I don't know, it's a lot.¹⁵

4. Products to Enhance Ghost Gun Lethality

72. JSD and other Eagle vendors do more than just sell products to make a Ghost Gun: they also sell products to make a Ghost Gun handgun even deadlier. Amongst such products are Large Capacity Magazines, which can hold a surplus number of rounds so that more shots can be fired without reloading.¹⁶

¹⁵ The Rogue Banshee, For the Love of Guns //Episode 4// Jordan Vinroe from JSD Supply, YouTube, at 35:42 (Aug. 16, 2021), <https://www.youtube.com/watch?v=SyPKPPOGMzQ>.

¹⁶ New Jersey law defines Large Capacity Magazines as “a box, drum, tube or other container which is capable of holding more than 10 rounds of ammunition to be fed continuously and

73. Additional lethality-enhancing products include Trigger Pull-Releases, which allow a gun to fire twice in rapid succession, both as the trigger is pulled and released. A video made over a year ago at an exhibition shows the effects of a JSD-manufactured Trigger Pull-Release paired with a JSD-sold Ghost Gun. The narrator in the video stands next to “Bob” from JSD, wearing JSD-branded clothing. After saying “we’ve got JSD Supply here” the narrator test-fires the gun, firing two shots with each trigger pull and release.¹⁷

5. Defendants’ Goal Is to Help Customers Make Ghost Guns

74. In Defendants’ manufacturing, selling, hosting the sale of, and/or marketing Ghost Gun Parts, Defendants’ explicitly stated business model has been to put working Ghost Guns in the hands of users. In an October 2020 interview, Vinroe acknowledged this:

Interviewer: “[Y]our business is basically people want [the MUP-1 Frame and jig] to build a firearm.”

Vinroe: “Right.”

Interviewer: “You provide that.”

Vinroe: “That’s what I do.”¹⁸

75. Similarly, in the same interview, Vinroe said: “We could make real guns, serialized guns . . . but, I don’t want to right now. We are doing this, and this is our focus, and we are 100 percent dedicated to the home builder and . . . this product segment.”¹⁹

directly therefrom into a semi-automatic firearm.” N.J.S.A. 2C:39-1(y). New Jersey categorically prohibits the possession of such Large Capacity Magazines by any non-military, non-law enforcement individual who does not have a specific registration. N.J.S.A. 2C:39-3.

¹⁷ Black Diamond Guns and Gear, Binary Block Trigger at the PSA Gathering, YouTube (Mar. 22, 2022), <https://www.youtube.com/watch?v=02oDLsXZOmE>.

¹⁸ Is It Local Interview, at 42:07.

¹⁹ Is It Local Interview, at 45:48.

76. Vinroe’s patent application²⁰ for the MUP-1 Frame explicitly states that the purpose of his invention is to build a fully functional gun: “[T]he invention is specifically fashioned to allow a completed article of manufacture into a pistol receiver which will accept parts manufactured to fit a Sig Sauer brand receiver such as a P320.” “Article of manufacture,” as used in the patent application, means the MUP-1 Frame. The patent application continues: “The tool jig also has various holes pre-drilled which are fashioned such as to emulate the machining and drill holes that would be necessary to finalize the firearm receiver [i.e., frame] to work with the factory parts that are commonly available other than the firearm receiver itself. Such parts would readily attach to the receiver completed using the invention thereby allowing a complete firearm to be constructed.”

77. To ensure that users can easily complete their Ghost Guns, Defendants have provided users with extensive instructional resources, including seminars conducted at Eagle Gun Shows, demonstrating how to finish Ghost Gun Frames and assemble the Ghost Gun Parts.

78. For the MUP-1 Frame, JSD has created and disseminated demonstration videos showing (a) how to finish an MUP-1 Frame using the associated jig,²¹ and (b) how to join the MUP-1 Frame with other Ghost Gun Parts to prepare it for final assembly.²² As Vinroe bragged to one interviewer: “It’s super easy to put together.”²³

²⁰ U.S. Patent No. 11,117,199 (filed Oct. 23, 2019) (issued Sept. 14, 2021); U.S. Patent No. D881,313 (filed Oct. 23, 2018) (issued Apr. 14, 2020).

²¹ JSD Supply, MUP 1 Jig Instructions, GunStreamer, (Nov. 16, 2019), https://gunstreamer.com/watch/mup-1-jig-instructions_dicMdqzIwrAtj53.html.

²² JSD Supply, MUP 1 Small Parts Assembly, YouTube (Sept. 21, 2019), <https://www.youtube.com/watch?v=1lw-ad4WVfU>.

²³ Is It Local Interview, at 41:00.

79. Defendants further trumpet unserialized firearm construction in their email newsletter. In November 2022, JSD announced that it was launching the sale of the “Ghost Gunner 3” in celebration of Vinroe’s birthday.²⁴ In April 2023, JSD announced that, for a new design, “the first 10 builds” would win a free patch and t-shirt.²⁵

80. In these ways, and in many others, Defendants have aggressively promoted the use of their Ghost Gun Kits to make Ghost Guns, not only extolling the ease of doing so but also actively training consumers on how to assemble a completed Ghost Gun.

C. Ghost Gun Design

81. Once assembled, a Ghost Gun closely resembles, and operates similarly to, a name-brand serialized firearm sold by licensed firearms dealers. The most common Ghost Guns resemble, by design, Glock handguns, with interchangeable parts. The leading manufacturer of Glock-style Ghost Gun Kits is Polymer80. Polymer80’s products are or have been sold by JSD and other vendors at Eagle Gun Shows.

82. Polymer80’s Glock-style Ghost Guns look very similar to Glock handguns, and function with equivalent lethality. An image of a completed Polymer80 “P80” Ghost Gun is on the left, and a Glock G17 is on the right:²⁶

²⁴ JSD Supply, Jordan’s Birthday Deals, DealTown (Nov. 1, 2022), <https://deal.town/jsd-supply/jordans-birthday-deals-FKUMZMZPD>.

²⁵ JSD Supply, Avidity Arms PD10 Parts Set!, DealTown (Apr. 28, 2023), <https://deal.town/jsd-supply/avidity-arms-pd10-parts-set-P3PU37LX9> (emphasis added).

²⁶ P80 PFS9™ Pistol - Black - 10RD Magazine, Polymer80, https://www.polymer80.com/P80-PFC9-Pistol-Black_10 (last visited Dec. 10, 2023); Glock 17 – The Original, Glock, <https://us.glock.com/en/pistols/g17> (last visited Dec. 10, 2023).



83. In describing Polymer80 Ghost Gun products, JSD says on its website:

“Finishing a custom Polymer 80 parts build is easy when you shop with us. Thanks to our products, you can put together a firearm that is identical to options available straight from the manufacturer. The custom handgun you build from our Polymer 80 kit looks, feels and operates just like any other gun. But they don’t require a background check or a serial number, making them the best solution when privacy is the main concern.”²⁷

84. One vendor of Ghost Gun Parts at Eagle Gun Shows even uses the website domain www.p80glocks.com (emphasis added), appealing to customers seeking a Glock-style gun that can be acquired without a serial number or background check.²⁸

85. Defendants also sell products for the Glock/P80 design they manufacture themselves.

86. Defendants market their in-house Glock/P80 Ghost Gun products under the “Patmos” brand. According to JSD’s website: “Patmos Arms brings big-brand quality to the table but leaves the big-name price tag at the door. Their aftermarket pistol barrels and slides are

²⁷ Polymer 80 Parts and Kits, JSD Supply, <https://jsdsupply.com/brand/polymer-80> (last visited Dec. 10, 2023).

²⁸ Glock has sued Polymer80 for patent infringement. See Glock, Inc. v. Polymer80, Inc., No. 23-cv-0086 (D. Nev.).

engineered to exacting OEM [original equipment manufacturer] standards to give you perfect fitment on all compatible pistols.”²⁹

87. Other Ghost Gun Kits and Ghost Gun Frames similarly emulate other name-brand handguns.

88. For example, JSD has pioneered an un-serialized clone of Sig Sauer’s P320 handgun. Sig Sauer’s frame, known as its Fire Control Unit, or “FCU”, sits within its grip and houses the trigger mechanism and other internal components, and can readily combine with original manufacturer-made and/or aftermarket parts to make a firearm. JSD’s MUP-1 Frame is an unserialized, unfinished clone of the P320 FCU, and is specifically designed to allow users to make a Sig Sauer-style Ghost Gun.

89. In addition to selling the MUP-1 Frame and its associated jig and finishing tools, JSD also sells bundles of parts and accessories, i.e., everything needed to readily make a Sig Sauer-style Ghost Gun.

II. New Jersey’s Ghost Gun Laws

A. The Evolution of New Jersey Ghost Gun Law

90. New Jersey’s Legislature has recognized and responded to the dangers presented by Ghost Guns and the Ghost Gun industry’s increasingly sophisticated practices. It has, among other things, prohibited outright the purchase or possession of Ghost Guns, Ghost Gun Kits, and Ghost Gun Frames; it has maintained longstanding prohibitions on conspiring in or facilitating direct criminal violations; and it has most recently mandated point-of-sale controls for all Ghost Gun Parts.

²⁹ Patmos Arms, JSD Supply, <https://jsdsupply.com/brand/patmos-arms> (last visited Dec. 10, 2023).

1. New Jersey Bans Ghost Gun Kits and Frames

91. In November 2018, New Jersey enacted P.L. 2018, c.138 (codified at N.J.S.A. 2C:39-9), amending New Jersey’s criminal firearms code by creating new felony prohibitions related to Ghost Guns. Particularly relevant here is N.J.S.A. 2C:39-9(k):

Purchasing firearm parts to manufacture a firearm without a serial number. In addition to any other criminal penalties provided under law, a person who, with the purpose to manufacture or otherwise assemble a firearm and without being registered or licensed do so as provided in chapter 58 of Title 2C of the New Jersey Statutes, purchases or otherwise obtains separately or as part of a kit a firearm frame or firearm receiver which is not imprinted with a serial number registered with a federally licensed manufacturer or any combination of parts from which a firearm without a serial number may be readily manufactured or otherwise assembled, but which does not have the capacity to function as a firearm unless manufactured or otherwise assembled is guilty of a crime of the third degree. Notwithstanding the provisions of N.J.S. 2C:1-8 or any other law, a conviction under this subsection shall not merge with a conviction for any other criminal offense and the court shall impose separate sentences upon a violation of this subsection and any other criminal offense.

As used in this subsection, “firearm frame or firearm receiver” means the part of a firearm that provides housing for the firearm’s internal components, such as the hammer, bolt or breechblock, action, and firing mechanism, and includes without limitation any object or part which is not a firearm frame or receiver in finished form but is designed or intended to be used for that purpose and which may readily be made into a firearm frame or receiver through milling or other means.

(underlining added to statute heading for clarity).

92. When signing the bill enacting this provision, New Jersey Governor Phil Murphy explained that Ghost Guns “giv[e] the public at large the ability to build their own unregistered, unsafe, and untraceable firearm. . . . [K]its to assemble ghost guns will no longer be allowed in New Jersey.” Likewise, then-Attorney General Gurbir Grewal explained that “[G]host guns put the safety of our residents and our law enforcement officers at risk, because they give anyone—

even terrorists, felons, or domestic abusers—access to an untraceable gun. . . . Governor Murphy and the Legislature [have provided] additional tools to rid our streets of these dangerous weapons.”

2. New Jersey Then Bans Possessing or Trafficking Ghost Guns

93. In 2019, recognizing that Ghost Gun Kits acquired and assembled into Ghost Guns were being resold on the black market, New Jersey introduced new prohibitions on the use and trafficking of Ghost Guns. This legislation created two new provisions of the criminal code. See P.L. 2019, c.165.

94. First, the legislation added a new prohibition on firearms without a serial number to Section 39-3, which enumerates “Prohibited Weapons and Devices”:

Firearms without a serial number. Any person who knowingly possesses a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver as defined in subsection k. of N.J.S. 2C:39-9 which is not imprinted with a serial number registered with a federally licensed manufacturer including, but not limited to, a firearm manufactured or otherwise assembled from parts purchased or otherwise obtained in violation of subsection k. of N.J.S. 2C:39-9, is guilty of a crime of the third degree.

N.J.S.A. 2C:39-3(n) (underlining added to statute heading for clarity).

95. Second, the legislation added a new prohibition on transporting firearms without a serial number to Section 39-9, which contains restrictions on unlicensed weapons transport:

Transporting a manufactured firearm without a serial number. In addition to any other criminal penalties provided under law, a person who transports, ships, sells, or disposes of a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver as defined in subsection k. of this section which is not imprinted with a serial number registered with a federally licensed manufacturer, including but not limited to a firearm manufactured or otherwise assembled from parts purchased or otherwise obtained in violation of subsection k. of this section, is guilty of a crime of the second degree.”

N.J.S.A. 2C:39-9(n) (underlining added to statute heading for clarity).

96. New Jersey’s longstanding prohibitions on conspiring to commit a crime, N.J.S.A. 2C:5-2, or serving as an accomplice in the commission of a crime, N.J.S.A. 2C:2-6, complement these criminal prohibitions applicable to purchasers of Ghost Gun Kits and Ghost Gun Frames, and to users and traffickers of Ghost Guns. See also N.J.S.A. 2C:1-3 (defining territorial applicability of New Jersey criminal laws).

3. New Jersey’s Statutory Public Nuisance Law

97. In July 2022, New Jersey enacted P.L. 2022, c.56 (codified at N.J.S.A. 2C:58-33–36), a civil liability statute imposing obligations on “gun industry members” and creating a civil cause of action for the Attorney General to enforce those new obligations, as well as existing ones.

98. N.J.S.A. 2C:58-35 (“Section 58-35”) provides, as to liability:

(a)(1) A gun industry member shall not, by conduct either unlawful in itself or unreasonable under all the circumstances, knowingly or recklessly create, maintain, or contribute to a public nuisance in this State through the sale, manufacturing, distribution, importing, or marketing of a gun-related product.

(a)(2) A gun industry member shall establish, implement, and enforce reasonable controls regarding its manufacture, sale, distribution, importing, and marketing of gun-related products.

99. N.J.S.A. 2C:58-34 (“Section 58-34”) applies these prohibitions and mandates to all Ghost Gun industry actors and products. Under Section 58-34:

“Gun industry member” means a person engaged in the sale, manufacturing, distribution, importing, or marketing of a gun-related product, and any officer, agent, employee, or other person authorized to act on behalf of that person or who acts in active concert or participation with one or more such persons.

“Gun-related Product” means any firearm, ammunition, ammunition magazine, firearm component or part including, but not limited to, a firearm frame and a firearm receiver, or firearm accessory, which product was, or was intended to be, sold, manufactured, distributed, imported, or marketed in this State, or

which product was possessed in this State and as to which it was reasonably foreseeable that the product would be possessed or used in this State.

“Public nuisance” means any condition which injures, endangers, or threatens to injure or endanger or contributes to the injury or endangerment of the health, safety, peace, comfort, or convenience of others or which otherwise constitutes a public nuisance under common law.

100. Section 58-34 also defines “reasonable controls” as “reasonable procedures, safeguards, and business practices that are designed to,” among other things:

(1) prevent the sale or distribution of a gun-related product to a straw purchaser, a firearm trafficker, a person prohibited from possessing a firearm under State or federal law, or a person who the gun industry member has reasonable cause to believe is at substantial risk of using a gun-related product to harm themselves or unlawfully harm another or of unlawfully possessing or using a gun-related product; . . .

(3) ensure that a gun industry member complies with all provisions of State and federal law and does not otherwise promote the unlawful sale, manufacture, distribution, importing, marketing, possession, or use of a gun-related product.

4. New Jersey Notifies the Public that Ghost Gun Product Sales Will Not Be Tolerated, Including by Out-of-State Actors

101. The Attorney General has put the public and the Ghost Gun industry on notice about the dangers of Ghost Guns, and the applicability of New Jersey law to members of the Ghost Gun industry who target, serve, or aid the New Jersey Ghost Gun market. In 2018, shortly after the State first criminalized Ghost Gun Kits and Ghost Gun Frames, the Attorney General sent public letters to Ghost Gun industry members, warning them to “cease and desist from selling and advertising ‘ghost guns’ to residents of New Jersey,” noting that “these weapons are

illegal in our state.”³⁰ In 2019, New Jersey sued one such out-of-state Ghost Gun Kit seller, entering into a settlement in 2021.³¹

102. New Jersey has, in fact, issued public statements about the threat that Defendants’ Ghost Guns pose to New Jersey. In October 2021, New Jersey arrested a Morris County resident who purchased over a dozen Ghost Gun Kits from a JSD table at an Eagle Gun Show in Allentown, Pennsylvania, and had more illegal weaponry in his home. New Jersey’s then-Acting Attorney General announced the arrest in a joint press conference with the Pennsylvania Attorney General, stating: “We are committed to shutting down the pipeline of illegal firearms into New Jersey, especially the untraceable ‘ghost guns’ that are quickly becoming a favorite of criminals.”³²

B. New Jersey Firearms Purchase and Possession Laws

103. New Jersey’s prohibitions against transactions in Ghost Guns, Ghost Gun Kits, and Ghost Gun Frames—and its point-of-sale-requirements for transactions in all Ghost Gun Parts—complement New Jersey’s laws concerning those persons who cannot lawfully purchase or possess a firearm, and concerning the required steps for obtaining a lawful firearm.

104. In New Jersey, no person may purchase a firearm without first receiving a state-issued Firearms Identification Card (“FID”) and, in the case of a handgun, a separate permit to

³⁰ N.J. Attorney General, Letter to Ghost Gun Industry Members (Jun. 12, 2018), https://nj.gov/governor/news/news/docs/Ghost_Gun_Letter.pdf.

³¹ N.J. Attorney General, AG Grewal Announces First-in-the-Nation Settlement with Ghost Gun Company (Mar. 18, 2021), <https://www.njoag.gov/ag-grewal-announces-first-in-the-nation-settlement-with-ghost-gun-company>.

³² Mike Catalini, New Jersey, Pennsylvania Collaborate in Ghost Gun Case, Associated Press (Oct. 29, 2021), <https://apnews.com/article/pennsylvania-new-jersey-gun-politics-0d26d82649361995be8f991428752d39>.

purchase a handgun. N.J.S.A. 2C:58-3.³³ To be issued an FID or a handgun purchase permit, a person must meet certain qualifications. These include having no prior conviction for a crime in New Jersey or its felony counterpart in any other state or federal jurisdiction, being over the age of 18 (or 21 for a handgun), and not being subject to a domestic violence restraining order. In addition, at the point of sale, all firearms transactions must go through a licensed gun dealer, who must first complete a National Instant Criminal Background Check on the purchaser before consummating the transaction.

105. People with prior convictions for, among other offenses, aggravated assault, aggravated sexual assault, carjacking, robbery, racketeering, domestic violence, or firearms trafficking are all disqualified from possessing a firearm under any circumstance. N.J.S.A. 2C:39-7; N.J.S.A. 2C:39-5(j). There are additional public safety restrictions of this type. For example, the Prevention of Domestic Violence Act of 1991 and the Extreme Risk Protective Order Act of 2018 restrict access to firearms for individuals at an elevated risk of harming themselves or others. N.J.S.A. 2C:25-17 et seq.; N.J.S.A. 2C:58-20 et seq.

C. Trafficking Indicators

106. New Jersey has also recently enacted legislation that codifies when firearms trafficking can be presumed. See Real Accountability for Consequences of Unlawful Trafficking of Firearms Act, P.L. 2023, c.148 (S. 3150 (2022)).

107. This law expressly permits the trier of fact in a criminal case to infer that a seller-defendant has the requisite intent to commit a firearm trafficking violation under certain circumstances. Specifically, this inference may be made if the seller:

³³ There are limited exceptions, such as for transactions between immediate family members or law enforcement.

- (1) transferred or planned to transfer the firearm within forty-five days of their own purchase and receipt of the firearm;
- (2) sold the other person three or more firearms within a one-year period;
- (3) received compensation for the firearm that was significantly above the fair market value;
- (4) did not conduct the transaction through a licensed retail dealer;
or
- (5) did not abide by the requirements of N.J.S.A. 2C:58-3(a)(3) or (b)(3) to complete a National Instant Criminal Background Check and did not provide a receipt or other documentation of the sale.

P.L. 2023, c.148 (underlining added to emphasize disjunctive).

108. Out-of-state conduct is “sufficient for prosecution if the defendant knew or should have known that the recipient of the firearm intended to possess, transfer, dispose, sell, or otherwise transport the firearm in this State.” Ibid.

III. Defendants’ History of Developing and Operating a Robust, Integrated Ghost Gun Business

A. Vinroe Founds JSD Supply and Targets New Jersey Through Eagle Gun Shows

109. Vinroe established JSD Supply in 2013. Initially, JSD sold Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts made by other manufacturers, including Polymer80. Vinroe has since built the company into a major integrated retailer, manufacturer, and patent-holding inventor of a wide range of gun parts, deliberately offering Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to the New Jersey market.

110. Rather than building geographically fixed, capital-intensive brick and mortar storefronts, Vinroe identified two alternative ways for JSD Supply to reach its customer base: online sales and gun shows.

111. Gun shows became key to JSD's access to the New Jersey market. Online sales are not conducive to cash payment and create attendant records; they also require shipment to the purchaser's address. By contrast, at a gun show, products are readily obtained for cash in person, at the point of sale. This allowed JSD's Ghost Gun business to target New Jersey customers while consummating the illegal Ghost Gun product transactions just outside of New Jersey's borders, and without leaving any paper trail.

112. The largest and most prominent gun show operator in Pennsylvania, Defendant Eagle Shows, provided JSD with multiple venues near the New Jersey border for JSD to market and sell Ghost Gun products. Eagle Shows, then operating under separate ownership as Eagle Arms Productions, held near-weekly gun-show bazaars in Pennsylvania, frequently in locations close to New Jersey. These Eagle Gun Shows allowed vendors to sell any variety of guns, gun parts, and gun paraphernalia. Eagle Shows did not limit or control its vendors' sales of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts.

B. JSD Expands into Manufacturing

113. Having already built JSD into a major retailer of other companies' Ghost Gun products, and having used Eagle Shows to sell to the high-demand New Jersey market, Vinroe then expanded his business.

114. Beginning around 2018, JSD started designing and manufacturing its own Ghost Gun Products, expanding its business beyond simply being a retailer of third-party products.

115. Having observed the Polymer80 Ghost Gun's dominance in the market for clones of Glock guns, JSD aimed to do the same for Sig Sauer designs. According to Vinroe, the Sig

Sauer P320, an increasingly popular design known for its modularity, was “going to be the next AR15, at least for the pistol world.”³⁴

116. JSD launched Vinroe’s proprietary MUP-1 Frame, with its accompanying jig for making a P320 Ghost Gun clone. Bringing these products to market, and cornering that market through a patent, positioned JSD as the dominant player in the world of unserialized Sig Sauer Ghost Gun clones.

C. Vinroe Purchases Eagle Shows, Giving Him Control of the Point of Sale

117. By 2020, JSD had become the country’s largest retailer of Ghost Gun Frames, and was emerging as a leading manufacturer in the Ghost Gun market. That year saw rapid expansion of its sales to New Jersey residents and others at Eagle Gun Shows. But then, action by the Pennsylvania Attorney General threatened to derail its business.

118. On March 7, 2021, the Pennsylvania Attorney General announced the interdiction and arrest of two Ghost Gun trafficking networks that were sourcing their Ghost Guns from vendors at Eagle Gun Shows.

119. Shortly thereafter, Kim Stolfer, President of Firearms Owners Against Crime, confronted Vinroe at the next Eagle Gun Show about JSD’s role in providing Ghost Guns to criminals. Vinroe refused to change his business practices.

120. Eagle Shows’ then-ownership, however, did agree to change its policy. On March 15, 2021, the Pennsylvania Attorney General announced that Eagle Shows had agreed to halt the sale of Ghost Gun Kits and Ghost Gun Frames at its gun shows, stating: “Ghost guns are quickly becoming the weapon of choice for criminals and fueling the gun violence epidemic.

³⁴ John Crump Live, The Patron Saint of 80s with St. Jordan Vinroe!, YouTube (Dec. 29, 2021), <https://www.youtube.com/watch?v=u1NshwJ51KM>.

These DIY gun kits should be subject to the same background checks and qualifications as fully functioning firearms to prevent criminals who are not legally able to purchase or possess guns from getting their hands on these deadly, untraceable weapons.”³⁵

121. Eagle Shows’ agreement to stop the sale of Ghost Gun Kits and Ghost Gun Frames at its shows threatened to end JSD’s access to the New Jersey market.

122. Vinroe responded by mobilizing his customers and fan base to vigorously oppose Eagle’s decision.

123. Three days later, on March 18, 2021, Eagle Shows reversed course. JSD would be allowed to continue selling Ghost Gun Kits, Ghost Gun Frames, and Ghost Gun Parts at Eagle Shows, as long as customers simply claimed that they could legally own a firearm and were not bringing unfinished frames to any jurisdiction where they were illegal. Eagle Shows did not require JSD to maintain such documentation, however, nor did it even require customers to present an ID or other verification.³⁶

124. Apparently, even this minimal requirement—which would have done nothing more than take Ghost Gun customers at their word—was too restrictive for Vinroe. It also underscored that JSD’s access to the New Jersey market was vulnerable to Eagle’s decisions.

³⁵ AG Shapiro, PA Largest Gun Show Promoter Reach Agreement to Ban Sale of Ghost Gun Kits, Pennsylvania Attorney General (Mar. 15, 2021), <https://www.attorneygeneral.gov/taking-action/ag-shapiro-pa-largest-gun-show-promoter-reach-agreement-to-ban-sale-of-ghost-gun-kits>.

³⁶ Dan Zimmerman, Sorry Josh, Eagle Arms Productions Will Allow Sales of ‘Ghost Gun’ Build Kits After All, The Truth About Guns (Mar. 18, 2021), <https://www.thetruthaboutguns.com/sorry-josh-eagle-arms-productions-will-allow-sales-of-ghost-gun-build-kits-after-all>.

125. Thus, on or about December 17, 2021, Vinroe simply acquired Eagle Shows.³⁷ As one publication applaudingly described it, “if you can’t beat them, then buy them.”³⁸

126. In the immediate next days, Eagle Shows held a gun show less than 30 miles from Camden, New Jersey, at the Greater Philadelphia Exposition Center in Oaks, Pennsylvania. As described by John Crump of ammoland.com: “Not only were unfinished frame and receiver kits sold once again everywhere at the gun show, but JSD Supply hosted educational classes that helped buyers of P80s finish their [Ghost Gun] kits into fully functional firearms.”³⁹ The show also hosted demonstrations on 3D printing of Ghost Gun Frames.

127. The ammoland.com story included several photographs—one of JSD’s Ghost Gun Frame finishing class, and another of Vinroe posing, with a minor, holding a boxing championship-style belt with the twin insignia of Eagle Shows and JSD Supply:

³⁷ Special Announcement, JSD Supply, Deal Town (Dec. 25, 2021), <https://deal.town/jsd-supply/special-announcement-PKY8C268M>. According to the Pennsylvania Secretary of State’s website, the principal address for Patriot Enterprises Worldwide LLC and JSD Supply’s owner are the same.

³⁸ John Crump, JSD Supply Acquires Gun Show that Was Forced to Ban Them, AmmoLand (Dec. 21, 2021), <https://www.ammoland.com/2021/12/jsd-supply-acquires-gun-show-that-was-forced-to-ban-them>.

³⁹ Id.



D. JSD Supply and Eagle Shows Combine and Expand Their Ghost Gun Strategy

128. Vinroe's purchase of Eagle Shows presented new and important opportunities for Eagle Shows and JSD to mutually benefit from each other's businesses.

129. JSD served as Eagle Shows' anchor retailer, drawing in entry-fee-paying and show-boosting foot traffic with JSD's prominence and market appeal in the Ghost Gun industry.

130. Vinroe then used his control of Eagle to position JSD booths advantageously at Eagle Gun Shows and set favorable policies for Ghost Gun product sales, marketing, and instruction. He discontinued Eagle's limited attempts to weed out Ghost Gun product purchasers who were felons or New Jersey residents. Affirmatively aiming at New Jersey, he also moved Eagle Gun Shows to locations closer to the New Jersey border and targeted Eagle's marketing efforts at New Jerseyans. People who purchase an online ticket to an Eagle Gun Show—including people from New Jersey who supply their email addresses and New Jersey physical addresses—and opt to receive Eagle emails are also automatically placed on the email lists of JSD and other Vinroe-affiliated companies.

131. Eagle's policy changes under Vinroe attracted and benefitted other Ghost Gun product vendors at Eagle Shows besides JSD. Under Vinroe's protective umbrella, these other vendors had a Ghost-Gun-aligned host in Eagle, with its new leader Vinroe able to coordinate with them to boost overall Ghost Gun product sales at Eagle Gun Shows. Eagle, in turn, profited from these other vendors who paid direct fees to Eagle for the ability to sell their Ghost Gun products and helped to boost overall attendance and Eagle's associated entry fees.

132. Illustrating the blurred lines between Eagle Shows and JSD under Vinroe's leadership, Vinroe has played the role of showman for both entities at the same shows. On behalf of Eagle Shows, he has personally manned the entrances, greeting visitors and collecting admission tickets. When speaking on Eagle Shows' behalf in interviews, he has worn JSD Supply t-shirts. And he has aggressively promoted and sold JSD's products to customers, including Ghost Gun products sold to New Jersey residents.

133. On Christmas Eve 2021, Vinroe celebrated the mutual benefits of the JSD-Eagle union. He wrote to JSD's email list—the size of which, upon information and belief, dramatically expanded by incorporating Eagle's mailing list:

As of December 17, 2021, Jordan Vinroe (Owner of JSD Supply) has acquired Eagle Shows gun show promotion in Pennsylvania. We are excited to be able to expand our business within the firearms industry. Eagle Shows is the premiere gun show promoter in PA. Our grand opening weekend at the Oaks Pa show on December 17-19 resulted in record breaking attendance! We will continue to bring you some of the biggest and best shows in the country. We have already added 2 new shows to the line up and are anticipating a huge year for 2022. Thank you for all of your support over the years!

- Jordan Vinroe

134. In March 2022, NBC News reported on the sales practices at Eagle Gun Shows under Vinroe's ownership.⁴⁰ NBC's report included video of a hidden-camera purchase of a Polymer80 Ghost Gun Kit from a JSD table at an Eagle Gun Show in Oaks, Pennsylvania. In the video, the purchaser asked whether he needed to present identification or undergo a background check. The JSD worker responded no; all that was needed was money. The purchase was then made in cash.

135. Discussing the Ghost Gun finishing and assembly process, the worker said that the kit "comes with the drill bits" and explained "you just drill in three holes on each side" using the jig and "cut these tabs off." He added: "there's tons and tons of videos online."

136. Interviewed by NBC, Vinroe acknowledged that criminals would use his products to quickly assemble Ghost Guns to commit crimes, yet still defended his sale of Ghost Gun Kits for cash without background checks. Asked directly whether he "bears responsibility" for "handing [criminals] a piece that they could build in half an hour and turn into a gun," Vinroe

⁴⁰ NBC News, Top Story with Tom Llamas - March 17, YouTube (Mar. 17, 2022), <https://youtube.com/watch?v=-BUIEk8xwqw>.

said: “I’m not a criminal . . . you can get keys and a pack of Budweiser and drunk drive and kill somebody too.” Vinroe characterized his sales of Ghost Gun Kits as “like buying a lawn chair at WalMart—you can buy a lawn chair just for cash.”

IV. Defendants Specifically Target Their Business to New Jersey

A. Defendants’ Knowledge of New Jersey Law and Specific Targeting of the New Jersey Ghost Gun Market

137. Defendants have publicly discussed New Jersey’s criminal prohibitions against Ghost Guns, Ghost Gun Kits, and Ghost Gun Frames, confirming their understanding of those laws. In one example, a primer posted to the Eagle Shows website in April 2022 explained that, in New Jersey, “[h]omemade firearms, like those assembled from the much demonized 80% lower, are illegal, as are the unmilled receiver blocks themselves.”⁴¹

138. The introduction to that same article says that “so many visitors” to Eagle Gun Shows “split[] their time between the Keystone state and our Eastern neighbor” (on a page titled, “Gun License in New Jersey – How to Buy in PA.”).⁴²

139. Despite their demonstrated knowledge of New Jersey’s prohibitions, and of their large New Jersey customer base, Defendants have continued to sell Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts targeted at New Jersey residents.

140. Defendants disregard rudimentary measures to exclude prospective New Jersey buyers of Ghost Gun Kits, Ghost Gun Frames, or parts bundles designed and promoted to make a Ghost Gun when combined with a 3D-printed Ghost Gun Frame. Defendants likewise fail to

⁴¹ Gun License in New Jersey – How to Buy in PA, Eagle Shows (Apr. 28, 2022), <https://eagleshows.com/gun-license-in-new-jersey-how-to-buy-in-pa>.

⁴² Ibid.

implement basic safeguards to prevent the sale of any Ghost Gun Parts to New Jersey straw purchasers,⁴³ firearms traffickers, or felons or other persons prohibited from possessing firearms.

141. Defendants, for example, at Eagle Gun Shows:

- Do not require salespersons to ask purchasers about their state of residence;
- Do not require purchasers of Ghost Gun Kits, Ghost Gun Frames, or Ghost Gun Parts to display state identification;
- Do not subject purchasers of Ghost Gun Kits, Ghost Gun Frames, or Ghost Gun Parts to any verification process to ensure that they are legally allowed to own or possess a firearm in New Jersey, or have not been found to present a danger in possessing a firearm in New Jersey;
- Do not post clear signage warning New Jersey residents that Ghost Gun Kits and Ghost Gun Frames to make Ghost Guns—as well as completed Ghost Guns—are illegal under New Jersey law and could subject them to criminal penalties;
- Do not require their employees to refuse a sale to a purchaser who appears to be from New Jersey; and
- Routinely accept cash, leaving no paper trail for the transaction.

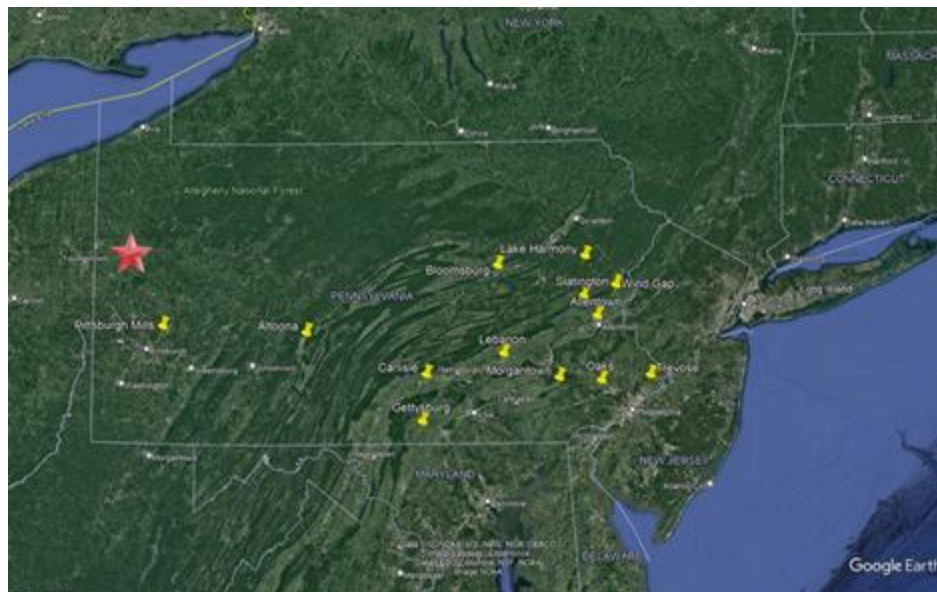
142. To the contrary, Defendants purposefully solicit and target New Jersey buyers, whom Vinroe has expressly recognized as a particularly eager and lucrative customer base for his wares: “What’s really good is when you get closer to places that are very restrictive, so a New Jersey, New York, Connecticut, Washington State. Anywhere where their gun laws are very strict, is where you see people wanting products the most.”⁴⁴

143. Accordingly, Eagle has largely concentrated its shows in the eastern part of Pennsylvania where they are accessible to New Jersey customers. Vinroe, since becoming Eagle’s owner, has only increased that overall eastward orientation, despite the fact that he and

⁴³ The term “straw purchase” commonly refers to a situation where a person who can pass a background check purchases a firearm for someone who cannot, or for a person who does not otherwise want to be associated with the transaction.

⁴⁴ Is It Local Interview, at 15:06.

his businesses are based close to the Ohio border in western Pennsylvania. In the map below, the yellow pins are locations of Eagle Gun Shows since 2018 identifiable through public sources; the red star represents the area where Defendants, and Vinroe, are based:



144. Not only do Defendants systematically operate gun shows close to the New Jersey border, they also actively advertise in New Jersey to attract New Jersey residents to those shows. Defendants have arranged, for example, to post billboard advertisements at milepost 70.2 on the New Jersey Turnpike in Cranbury, New Jersey, displaying the date and location of upcoming Eagle Gun Shows. See ¶ 36, supra.

B. Ghost Gun Products Sold by Defendants to New Jerseyans Are Ubiquitous in New Jersey

145. Material numbers of New Jersey buyers have indeed been purchasing Defendants' Ghost Gun Kits, Ghost Gun Frames, and Ghost Gun Parts at Eagle Gun Shows, and promptly taking those products back to New Jersey. Numerous New Jerseyans have been observed by law enforcement doing precisely that, and have been prosecuted accordingly.

146. But the true magnitude of the influx of Defendants' Ghost Gun products into New Jersey cannot be known with certainty because the products, by design, are untraceable. Defendants further avoid traceability by conducting a large portion of their sales in cash.

147. Nevertheless, police work by New Jersey law enforcement confirms Defendants' years-long pattern and practice of putting Ghost Guns into the hands of New Jerseyans. The associated criminal activity detailed below illustrates how Defendants' sale of Ghost Gun products to New Jerseyans—without reasonable controls—directly threatens public safety in New Jersey.

1. New Jersey Residents Arrested for Unlawful Possession of Defendants' Ghost Gun Products

148. New Jersey law enforcement authorities have arrested numerous individuals returning to New Jersey from Eagle Gun Shows with Ghost Gun Kits, Ghost Gun Frames, and/or Ghost Gun Parts. Most of these individuals were New Jersey residents who traveled to an Eagle Gun Show in a car with New Jersey license plates. On information and belief, many (if not all) of them made or participated in a purchase while carrying New Jersey-issued identification, including in a visible manner. Yet JSD or another Eagle vendor still sold these persons multiple Ghost Gun Kits—a telltale indicator of a purchaser's intent to traffic. In several cases, Defendants' purchasers or purchasers' co-conspirators had prior criminal records that disqualified them from gun purchase or possession.

149. These arrests occurred after the March 2021 announcement by the Pennsylvania Attorney General that vendors at Eagle Gun Shows (such as JSD Supply) had sold numerous Ghost Gun Kits to two separate Pennsylvania gun trafficking networks. They include many arrests made after Vinroe's December 2021 acquisition of Eagle.

150. Certain details about the events giving rise to such arrests are now public, and include the following:

- a. In September 2021, two North Jersey residents were arrested crossing back into New Jersey after going to JSD's table at Eagle's Allentown gun show. The items seized during those arrests included:
 - Thirteen Polymer80 Ghost Gun Frames
 - Two JSD jigs
 - Additional Ghost Gun Parts to complete working firearms
 - Sixteen illegal large capacity magazines, for handguns and assault rifles
 - An AR-15-style Ghost Gun assault weapon made from Ghost Gun Parts purchased at a prior gun show (found during a search of one of their homes, after the arrest at the border)⁴⁵
- b. In February 2022, three Camden, New Jersey residents went to a JSD table at an Eagle Gun Show in Oaks, PA, and purchased two bags' worth of Polymer80 Ghost Gun Frames and finishing kits. Law enforcement searched their house and recovered:
 - Two finished Ghost Guns
 - Numerous additional Ghost Gun Parts and Ghost Gun manufacturing tools

Prosecutors charged each defendant with seven violations of 2C:39-9(k). Law enforcement also identified a co-conspirator who had a prior conviction for child endangerment and thus was disqualified from purchasing or possessing a firearm.⁴⁶
- c. In February 2022, a pair of Camden, New Jersey residents purchased at least seven Polymer80 Ghost Gun Kits from JSD at another Eagle Gun Show. One had a history of felony weapons possession. Law enforcement conducted a search and found the kits, plus:
 - Two additional handguns
 - Large capacity magazines⁴⁷
- d. In March 2022, a Cherry Hill, New Jersey resident with a prior felony conviction attended an Eagle Gun Show in Allentown and walked out with:
 - Five Polymer80 Ghost Gun Kits
 - Associated parts to complete Ghost Guns
 - Six 21-round large capacity magazines for a 9mm handgun

⁴⁵ See New Jersey v. Pillus, Case No. MRS-21-001361.

⁴⁶ See New Jersey v. DeJesus, Case No. CAM-22-000891.

⁴⁷ See New Jersey v. Dupree, Case No. CAM-22-000837.

According to investigators, the man “stated that he observed a billboard advertising the Allentown Gun Show which peaked [sic] his interest;” “stat[ed] he didn’t know he wasn’t able to purchase the items, especially since they let him purchase it;” and “figured if it was illegal to purchase, they would ask him for identification or something, but they didn’t ask him for nothing so he thought it was okay to buy.”⁴⁸

- e. In July 2022, two Trenton, New Jersey residents attended an Eagle Gun Show in Trevoze, Pennsylvania, approximately nine miles from the New Jersey border. They returned to Trenton with:
 - Five Polymer80 Ghost Gun Kits
 - Large capacity magazines
 - Additional Ghost Gun Parts⁴⁹

151. Detailed information about more recent arrests is generally not public.

Nevertheless, New Jersey law enforcement has arrested numerous persons since July 2022 returning to New Jersey with Ghost Gun Kits, Ghost Gun Frames, and Ghost Gun Parts from Eagle Gun Shows, including as recently as June 2023.⁵⁰

2. Other JSD Ghost Guns Are Recovered in New Jersey

152. Law enforcement in New Jersey has also recovered and identified multiple Ghost Guns in New Jersey that appear to have JSD Ghost Gun Frames. For example, in December 2019, a Sig Sauer style Ghost Gun was recovered from a Camden County drug dealer who used the gun to threaten his girlfriend, resulting in a domestic violence restraining order.⁵¹ Upon information and belief, JSD is the only manufacturer that has made unfinished clones of Sig Sauer handgun frames for sale to purchasers.

153. Investigations conducted by other jurisdictions into Defendants’ activities have revealed still further New Jersey sales. The City of Philadelphia recently reported in litigation it

⁴⁸ See New Jersey v. Rivera, Case No. CAM-22-001662.

⁴⁹ See New Jersey v. Oliver, Case No. MER-22-002437.

⁵⁰ See New Jersey v. Devine, Case No. MER-23-002011.

⁵¹ See New Jersey v. Smith, Case No. CAM-19-008659.

filed against JSD (as well as Polymer80): “[W]hen investigators attended the Eagle Show in Oaks, Pennsylvania . . . they observed several buyers of [Ghost Gun Kits] with New Jersey IDs in their wallets.”⁵²

154. Upon information and belief, the foregoing examples represent only a small fraction of Defendants’ overall contribution of untraceable Ghost Guns to the Ghost Gun public nuisance in New Jersey. Defendants are, upon information and belief, among the largest, if not the largest, purveyors to New Jersey residents of Ghost Gun products.

V. Defendants’ Unlawful Conduct Contributes to a Public Nuisance in New Jersey

A. Ghost Guns Account for a Disproportionate, and Growing, Share of Crime Guns in New Jersey

155. In 2022, 428 Ghost Guns were recovered from New Jersey crime scenes by New Jersey law enforcement authorities. That was four times the number of Ghost Guns recovered in 2020, whereas overall firearms recoveries remained stable.

156. There is good reason to believe these numbers significantly understate the percentage of crimes in which Ghost Guns were used because the Ghost Guns were thereafter not found or not correctly classified as Ghost Guns.⁵³

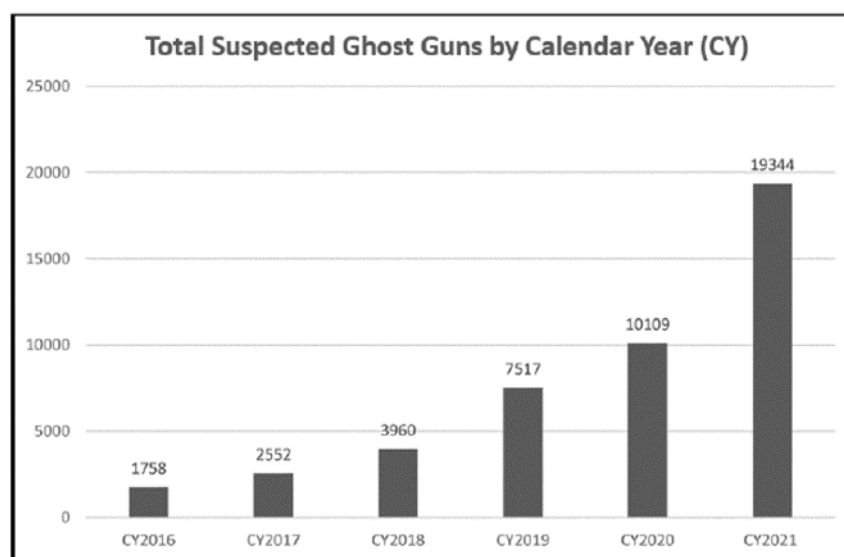
157. Ghost Guns already represent at least an 8 percent (and growing) share of the recovered crime guns in New Jersey. Considering that the quantity of serialized firearms had been growing in New Jersey for decades before Ghost Guns first came onto the scene in 2015,

⁵² Complaint ¶ 150, City of Philadelphia v. Polymer80, No. 230700362 (Phila. Ct. Com. Pl. July 5, 2023).

⁵³ For example, Ghost Guns are often assembled incorporating parts that correspond to registered firearms. As a result, those firearms may be misidentified as the serialized firearms from which such parts came, when they are in reality Ghost Guns that should have been included in the above tally.

and that, unlike serialized firearms, Ghost Guns are categorically illegal to possess in New Jersey, this 8 percent is a disproportionately high figure.

158. The increasing proliferation of Ghost Gun involvement in criminal activity is not unique to New Jersey. The federal Bureau of Alcohol, Tobacco, Firearms, and Explosives has reported that, from January 1, 2016 through December 31, 2021, law enforcement agencies in the United States recovered more than 45,000 suspected Ghost Guns from crime scenes, with the rate of recovery of Ghost Guns rapidly increasing:⁵⁴



B. The Harms and Costs of Ghost Gun Violence

1. Victims and Their Families

159. The most obvious harm from Ghost Gun violence is felt by its direct victims. In 2021, for example, there were 276 gun-related homicides in New Jersey.⁵⁵ In the same year, the

⁵⁴ 27 C.F.R. §§ 447–449 (2022).

⁵⁵ WISQARS Fatal and Nonfatal Injury Reports, Ctrs. for Disease Control & Prevention, <https://wisqars.cdc.gov/reports/?o=MORT&y1=2021&y2=2021&t=0&d=&i=3&m=20890&g=34&me=0&s=0&r=0&ry=0&e=0&yp=65&a=ALL&g1=0&g2=199&a1=0&a2=199&r1=INTENT&r2=NONE&r3=NONE&r4=NONE> (last visited Dec. 10, 2023).

number of non-fatal criminal shooting victims was several times greater. As noted above, as of 2022, at least 8 percent of recovered crime guns are Ghost Guns.

160. The mental health impacts on direct victims are also severe. According to a study conducted by the University of Pennsylvania’s Perelman School of Medicine, of 2629 shooting incidents surveyed, 31 percent involved one or more corresponding mental health–related emergency department visits in the 60 days following the shooting.⁵⁶

2. Family and Community Impacts

161. Gun violence likewise impacts, profoundly, the families of victims, including mothers and fathers who have lost children to gun violence or children who have lost a parent to gun violence.

162. Anyone who is present during gun violence faces risks to their own mental health. David Hemenway, Director of the Harvard Injury Control Research Center, explains that exposure to gun violence “increases the risk for psychiatric, emotional, behavioral, and health problems,” including post-traumatic stress disorder, depression, anxiety, withdrawal, lowered academic performance, substance abuse, and delinquency. Witnessing or being a direct victim of an act of gun violence also increases the risk that an individual will themselves become a perpetrator of violence.⁵⁷

163. As gun violence rises, feelings of lost safety pervade and impact communities; parents keep children closer to home; and businesses erect more safety measures, which can lead

⁵⁶ Natasha Brown, How Gun Violence Is Impacting Mental Health of Philadelphia’s Youth, CBS News Philadelphia (Feb. 27, 2023, 5:52 p.m.), <https://www.cbsnews.com/philadelphia/news/philadelphia-gunviolence-teen-mental-health-nami>.

⁵⁷ Jeffrey B. Bingenheimer et al., Firearm Violence, Exposure and Serious Violent Behavior, 308 Science 1323 (2005).

to alienation within a community. “The result may be blighted neighborhoods, playgrounds abandoned to gang members, and business districts that close down at sunset.”⁵⁸

3. Economic Costs

164. In 2022, the National Institute for Criminal Justice Reform (“NICJR”) set out to measure the taxpayer cost of gun violence, specifically in the City of Newark. NICJR estimated that each homicide shooting costs taxpayers \$2,188,700, and each non-fatal shooting costs taxpayers \$1,007,077.

165. NICJR took into account six categories of costs: crime scene response, hospital and rehabilitation, criminal justice, incarceration, victim support (such as burial expenses) through the New Jersey Victim of Crime Compensation Office, and lost tax revenue.

166. Other substantial costs from gun violence include the strain on hospital systems, out-of-pocket medical expenses, heightened insurance premiums, and the cost of additional law enforcement resources to deter, interdict, and mitigate crime.

167. Defendants—one of which claims to be the nation’s largest retailer of Ghost Gun Frames while the other holds some of the biggest gun shows in the country, and both of which deliberately concentrate their businesses along the New Jersey border to attract New Jersey residents—are responsible for a substantial share of these costs and for fueling the ongoing public nuisance in New Jersey.

⁵⁸ Philip J. Cook & Jens Ludwig, Gun Violence: The Real Costs 94 (2000).

CAUSES OF ACTION

Count One

(Contribution to Public Nuisance by Conduct Unlawful in Itself) (Public Law 2022, c. 56, N.J.S.A. 2C:58-35(a)(1))

168. The Attorney General repeats and realleges the foregoing allegations as if set forth in their entirety herein.

169. The Attorney General brings this count pursuant to N.J.S.A. 2C:58-35.

170. Under Section 58-35(a)(1), “[a] gun industry member shall not, by conduct [] unlawful in itself . . . , knowingly or recklessly create, maintain, or contribute to a public nuisance in this State through the sale, manufacturing, distribution, importing, or marketing of a gun-related product.”

171. A “[g]un industry member’ means a person engaged in the sale, manufacturing, distribution, importing, or marketing of a gun-related product, and any officer, agent, employee, or other person authorized to act on behalf of that person or who acts in active concert or participation with one or more such persons.” N.J.S.A. 2C:58-34. A “[p]erson’ means any natural person, firm, corporation, company, partnership, society, joint stock company, or any other entity or association.” Ibid.

172. Defendants—who are a retailer and a gun show operator each engaged in and participating in the sale and marketing of gun-related products—are gun industry members within the meaning of Sections 58-34 and 58-35.

173. “‘Gun-related product’ means any firearm, ammunition, ammunition magazine, firearm component or part including, but not limited to, a firearm frame and a firearm receiver, or firearm accessory . . . which product was possessed in this State and as to which it was

reasonably foreseeable that the product would be possessed or used in this State.”

N.J.S.A. 2C:58-34.

174. Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts sold by or through Defendants to New Jersey purchasers are gun-related products within the meaning of Sections 58-34 and 58-35.

175. Defendants’ conduct has been “unlawful in itself.” Defendants have knowingly agreed to aid (and have aided) New Jersey residents’ illegal possession of Ghost Guns, and Ghost Gun Kits and Ghost Gun Frames to make Ghost Guns. Defendants have knowingly agreed to solicit (and have solicited) New Jersey residents’ illegal possession of Ghost Guns and/or Ghost Gun Kits and Ghost Gun Frames to make Ghost Guns. They have done so with the purpose of promoting or facilitating New Jersey residents’ illegal possession of Ghost Guns, as well as of Ghost Gun Kits and Ghost Gun Frames to make Ghost Guns.

176. Defendants’ conduct aids, facilitates, promotes, solicits, and participates in violations of N.J.S.A. 2C:39-3(n), 2C:39-9(k), and 2C:39-9(n), and is itself in violation of these provisions. See N.J.S.A. 2C:2-6.

177. Defendants’ conduct is also unlawful in itself in that Defendants have knowingly agreed to aid (and have aided) and knowingly agreed to solicit (and have solicited) New Jersey residents’ illegal possession of Large Capacity Magazines. Defendants have done so with the purpose of promoting or facilitating such illegal possession. See N.J.S.A. 2C:39-3(j), 2C:2-6.

178. Defendants’ unlawful conduct consists of knowing acts or omissions that constitute knowing violations of N.J.S.A. 2C:58-35(a)(1), 2C:39-3(n), 2C:39-9(k), 2C:39-9(n), and 2C:39-3(j).

179. Defendants' unlawful conduct in their selling, distributing, manufacturing, and/or marketing of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts has knowingly or recklessly created, maintained, or contributed to a public nuisance within the meaning of Section 58-35(a)(1). "'Public nuisance' means any condition which injures, endangers, or threatens to injure or endanger or contributes to the injury or endangerment of the health, safety, peace, comfort, or convenience of others or which otherwise constitutes a public nuisance under common law." N.J.S.A. 2C:58-34.

180. Ghost Guns have increasingly proliferated in New Jersey, including among persons prohibited from purchasing or possessing a firearm on the basis of a prior felony or other disqualifier, or who hope to avoid or impede law enforcement.

181. This condition injures and endangers the health, safety, peace, comfort, and convenience of New Jersey residents; threatens to injure and endanger the health, safety, peace, comfort, and convenience of New Jersey residents; and contributes to the injury and endangerment of the health, safety, peace, comfort, and convenience of New Jersey residents. Defendants have created, maintained, and/or contributed to this condition, and they have done so knowingly or recklessly.

182. Defendants' violation of Section 58-35(a) entitles the Attorney General to "an injunction prohibiting [Defendants] from continuing that conduct or engaging therein or doing any acts in furtherance thereof." N.J.S.A. 2C:58-35(b). Such injunctive relief is necessary here to prevent further, continuing, and irreparable injury.

183. The Attorney General is likewise entitled to an order providing for abatement of the nuisance(s) at Defendants' expense.

184. The Attorney General is further entitled to recover damages, reasonable attorneys' fees, filing fees, reasonable costs of suit, and any other appropriate relief. See N.J.S.A. 2C:58-35(b).

185. Defendants' unlawful actions and/or omissions were undertaken with actual malice or accompanied by wanton and willful disregard of persons who foreseeably might be harmed by those actions or omissions, within the meaning of the Punitive Damages Act, N.J.S.A. 2A:15-5.12. Defendants are therefore liable for punitive damages.

Count Two

(Contribution to Public Nuisance by Conduct Unreasonable Under the Circumstances) (Public Law 2022, c. 56, N.J.S.A. 2C:58-35(a)(1))

186. The Attorney General repeats and realleges the foregoing allegations as if set forth in their entirety herein.

187. The Attorney General brings this count pursuant to N.J.S.A. 2C:58-35(a)(1).

188. Under Section 58-35(a)(1), "[a] gun industry member shall not, by conduct . . . unreasonable under all the circumstances, knowingly or recklessly create, maintain, or contribute to a public nuisance in this State through the sale, manufacturing, distribution, importing, or marketing of a gun-related product."

189. Defendants' conduct in their selling, distributing, manufacturing and/or marketing of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts, or in facilitating the same, is unreasonable under all the circumstances. See N.J.S.A. 2C:58-35(a)(1).

190. Defendants' unreasonable conduct consists of knowing acts or omissions that constitute knowing violations of N.J.S.A. 2C:58-35(a)(1), 2C:39-3(n), 2C:39-9(k), 2C:39-9(n), and/or 2C:39-3(j).

191. Defendants’ conduct in their selling, distributing, manufacturing, and/or marketing of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts, or facilitating the foregoing, has knowingly and/or recklessly created, maintained, or contributed to a public nuisance in New Jersey, within the meaning of Section 58-35(a)(1). “‘Public nuisance’ means any condition which injures, endangers, or threatens to injure or endanger or contributes to the injury or endangerment of the health, safety, peace, comfort, or convenience of others or which otherwise constitutes a public nuisance under common law.” See N.J.S.A. 2C:58-34.

192. As a result of Defendants’ actions, New Jersey has expended additional resources to deter, interdict, and mitigate crime effectuated or compounded by Ghost Guns. Specifically, and among other things, New Jersey has incurred damages in the form of additional compensation to law enforcement officials, the hiring of additional law enforcement officials, increased crime lab and ballistics costs, and other costs to enforce the laws Defendants have undermined, as well as increased public health costs, mental health costs, educational costs, business loss, and other costs to the State resulting from Ghost Gun violence and the threat thereof, and of other Ghost Gun-adjacent crime and the threat thereof.

193. Defendants’ conduct in violation of Section 58-35(a) entitles the Attorney General to “an injunction prohibiting [Defendants] from continuing that conduct or engaging therein or doing any acts in furtherance thereof.” See N.J.S.A. 2C:58-35(b). Such injunctive relief is necessary here to prevent further, continuing, and irreparable injury.

194. The Attorney General is likewise entitled to an order providing for abatement of the nuisance(s) at Defendants’ expense.

195. The Attorney General is further entitled to recover damages, reasonable attorneys' fees, filing fees, reasonable costs of suit, and any other appropriate relief. See N.J.S.A. 2C:58-35(b).

196. Defendants' unreasonable actions and/or omissions were undertaken with actual malice or accompanied by wanton and willful disregard of persons who foreseeably might be harmed by those actions or omissions, within the meaning of the Punitive Damages Act, N.J.S.A. 2A:15-5.12. Defendants are therefore liable for punitive damages.

Count Three

(Failure to Establish, Implement, and Enforce Reasonable Controls) (Public Law 2022, c. 56, N.J.S.A. 2C:58-35(a)(2))

197. The Attorney General repeats and realleges the foregoing allegations as if set forth in their entirety herein.

198. The Attorney General brings this count pursuant to N.J.S.A. 2C:58-35(a)(2).

199. Under Section 58-35(a)(2), "a gun industry member shall establish, implement, and enforce reasonable controls regarding its manufacture, sale, distribution, importing, and marketing of gun-related products."

200. "Reasonable controls" means "reasonable procedures, safeguards, and business practices that are designed to," inter alia:

(1) prevent the sale or distribution of a gun-related product to a straw purchaser, a firearm trafficker, a person prohibited from possessing a firearm under State or federal law, or a person who the gun industry member has reasonable cause to believe is at substantial risk of using a gun-related product to harm themselves or unlawfully harm another or of unlawfully possessing or using a gun-related product;

...

(3) ensure that a gun industry member complies with all provisions of State and federal law and does not otherwise promote the

unlawful sale, manufacture, distribution, importing, marketing, possession, or use of a gun-related product.”

[See N.J.S.A. 2C:58-34.]

201. Defendants have failed to “establish, implement, and enforce reasonable controls regarding [their] manufacture, sale, distribution, . . . and marketing” of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts in at least three respects:

a. First, Defendants lack “reasonable procedures, safeguards, and business practices that are designed to . . . prevent the sale or distribution of a gun-related product to a straw purchaser, a person prohibited from possessing a firearm under State [] law, or a person who the gun industry member has reasonable cause to believe is at substantial risk of using a gun-related product to harm themselves or unlawfully harm another or of unlawfully possessing or using a gun-related product.”

b. Second, Defendants lack “reasonable procedures, safeguards, and business practices that are designed to . . . ensure they comply with all provisions of State [] law[.]”

c. Third, Defendants lack “reasonable procedures, safeguards, and business practices that are designed to . . . ensure that [they] . . . do[] not otherwise promote the unlawful sale, manufacture, distribution, [] marketing, possession, and use of a gun-related product.”

202. Defendants’ failures to establish, implement, and enforce reasonable controls arise from knowing acts or omissions that constitute knowing violations of N.J.S.A. 2C:58-35(a)(2), 2C:39-3(n), 2C:39-9(k), 2C:39-9(n), and 2C:39-3(j).

203. Defendants’ conduct in violation of Section 58-35(a) entitles the Attorney General to “an injunction prohibiting [Defendants] from continuing that conduct or engaging therein or

doing any acts in furtherance thereof.” See N.J.S.A. 2C:58-35(b). Such injunctive relief is necessary here to prevent further, continuing, and irreparable injury.

204. The Attorney General is likewise entitled to an order providing for abatement of the nuisance(s) at Defendants’ expense.

205. The Attorney General is further entitled to recover damages, reasonable attorneys’ fees, filing fees, reasonable costs of suit, and any other appropriate relief. See N.J.S.A. 2C:58-35(b).

206. Defendants’ actions and/or omissions in violation of Section 58-35(a)(2) were undertaken with actual malice or accompanied by wanton and willful disregard of persons who foreseeably might be harmed by those actions or omissions, within the meaning of the Punitive Damages Act, N.J.S.A. 2A:15-5.12. Defendants are therefore liable for punitive damages.

Count Four

(Common Law Public Nuisance)

207. The Attorney General repeats and realleges the foregoing allegations as if set forth in their entirety herein.

208. The Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts sold by Defendant JSD Supply or sold at shows operated by Defendant Eagle Shows to New Jersey purchasers are designed to be made and assembled into completed Ghost Guns. Defendants know this when they sell, distribute, market, and promote Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts, or facilitate the foregoing.

209. The sale, distribution, marketing, and promotion of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts attract buyers who: (a) are prohibited from purchasing or possessing a firearm under New Jersey law, including on the basis of a prior felony or other dangerousness that disqualifies them from gun ownership; (b) hope to avoid or impede law

enforcement investigation of guns, gun violence, or gun crime by using untraceable firearms; and/or (c) intend to traffic, sell, or similarly distribute Ghost Guns, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to persons who meet the description of (a) or (b). Defendants know this.

210. Defendants have failed to take meaningful steps to avoid selling Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to such purchasers, or to avoid facilitating the foregoing. To the contrary, Defendants have endeavored to remove barriers to such sales.

211. New Jersey has, for years, banned the possession of Ghost Guns and of Ghost Gun Kits and Ghost Gun Frames to make Ghost Guns. N.J.S.A. 2C:39:3(n), 2C:39-9(k), 2C:39-9(n). Defendants know this.

212. New Jersey prohibits persons who are subject to various statutory disqualifications from possessing any firearm. These include persons who, for example, have prior felonies, are minors, or have been determined to pose a risk to themselves or others. Defendants know this.

213. New Jersey prohibits persons from purchasing a handgun without acquiring a handgun purchase permit or Firearms Identification Card (“FID”), and New Jersey subjects the availability of the FID to background checks in order to screen out persons who are statutorily disqualified from possessing a firearm. Defendants know this.

214. Defendants understand New Jersey’s Ghost Gun and other firearms laws to be more “restrictive” than those of Pennsylvania. Yet Defendants have failed to take reasonable measures to prevent or avoid the sale of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to New Jersey residents or to others whom they have reason to know would likely be possessing, assembling, and/or using them in New Jersey.

215. Rather, Defendants treat the differences between Pennsylvania law and New Jersey law as a business opportunity, and specifically target New Jersey customers for such transactions.

216. Defendants have sold, or facilitated the sale of, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to New Jersey residents at Eagle Gun Shows near the New Jersey border while knowing that: (a) such items were likely to be brought into the State of New Jersey in violation of New Jersey laws, including N.J.S.A. 2C:39-9(k); (b) many such items would be assembled into or used to assemble a completed Ghost Gun that would be possessed in or transported into New Jersey in violation of N.J.S.A. 2C:39-3(n) and/or N.J.S.A. 2C:39-9(n); and (c) Ghost Guns, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts are particularly attractive to persons who are prohibited from purchasing or possessing a firearm on the basis of a prior felony or other dangerousness that disqualifies them from gun ownership, or who hope to avoid or impede law enforcement investigations of criminal activity by using untraceable firearms.

217. New Jersey residents (and others) have purchased Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts from Defendant JSD or at gun shows run by Defendant Eagle Shows and unlawfully brought such items into New Jersey. A material number of those individuals have then unlawfully resold or distributed such items, or used such items to assemble Ghost Guns for their own unlawful possession or to unlawfully sell or distribute Ghost Guns. All of this was reasonably foreseeable by Defendants.

218. Defendants' sale of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts has contributed and contributes to gun violence and crime in New Jersey. This is because, among other things, Defendants: (a) sold or sell, or facilitated or facilitate the sale of, Ghost Gun

Kits, Ghost Gun Frames, and other Ghost Gun Parts to individuals ineligible to purchase or possess a gun under New Jersey law as a matter of public safety, such as felons; (b) sold or sell, or facilitated or facilitate the sale of, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to individuals who then distribute such products or finished Ghost Guns to persons who are ineligible for gun possession in New Jersey; (c) sold or sell, or facilitated or facilitate the sale of, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to individuals who may be eligible to be licensed for gun ownership or purchase, but seek an unlicensed and illegal gun to avoid or impede law enforcement investigation of gun violence or criminal activity by using untraceable firearms; and (d) sold or sell, or facilitated or facilitate the sale of, Ghost Gun Kits, Ghost Gun Frames, and Ghost Gun Parts which, if used by anyone in the context of a crime or other incident, could not be traced by law enforcement, thus thwarting New Jersey's regulatory scheme designed to protect public health and safety.

219. Defendants' sale, or facilitation of the sale, of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts unreasonably interferes with the right, common to the people of New Jersey, to be free of the dangers posed by Ghost Guns. Defendants' actions significantly interfere with the public health, the public safety, the public peace, the public comfort, and the public convenience of New Jersey residents.

220. Defendants know or have reason to know that their conduct has a significant effect on the right of New Jersey residents to be free of the dangers posed by Ghost Guns.

221. Defendants' conduct at issue is proscribed by New Jersey state law banning New Jersey residents from possessing Ghost Guns, Ghost Gun Kits, and Ghost Gun Frames. Defendants know that such possession is illegal in New Jersey, yet have knowingly contributed to, and aided and abetted, such criminal activity by selling, and/or facilitating the sale of, Ghost

Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to New Jersey residents and others they have reason to know are likely to enter New Jersey.

222. Since July 2022, New Jersey has required gun industry members to establish, implement, and enforce reasonable controls regarding their manufacture, sale, distribution, and marketing of all gun-related products, which Defendants have failed to do.

223. Defendants' conduct is of a continuing nature and has produced a permanent or long-lasting effect, which includes increased violence, injury, legitimate fear of violence, and inability to enjoy public peace, comfort, and convenience, suffered on the part of New Jersey residents.

224. Defendants' conduct at issue consists of knowing acts or omissions that constitute knowing violations of N.J.S.A. 2C:58-35(a)(1), 2C:39-3(n), 2C:39-9(k), 2C:39-9(n), and 2C:39-3(j).

225. The Attorney General has the legal right to remedy a public nuisance by virtue of his police power. This includes seeking relief to cease and abate that nuisance and/or fund the cost of abatement.

226. Injunctive relief is necessary to prevent continuing injury. These injuries, including increased violence and the legitimate fear of violence, are irreparable and cannot be remedied by monetary relief alone.

Count Five

(Negligence)

227. The Attorney General repeats and realleges the foregoing allegations as if set forth in their entirety herein.

228. At all relevant times, Defendants knew or should have known that the Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to make Ghost Guns sold by Defendant JSD

Supply and/or sold at shows operated by Defendant Eagle Shows were being sold to New Jersey residents, or to others likely to take such items to New Jersey, where many would sell them or completed Ghost Guns to secondary purchasers based in New Jersey.

229. At all relevant times, Defendants owed the State of New Jersey and its residents a duty to exercise reasonable care and not expose others to foreseeable risks of injury.

230. Defendants knew or should have known that their Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to make Ghost Guns attract buyers who: (a) are prohibited from purchasing or possessing a firearm, including on the basis of a prior felony or other dangerousness that disqualifies them from gun ownership; (b) hope to avoid or impede law enforcement investigation of guns, gun violence, or gun crime by using untraceable firearms; and/or (c) intend to traffic, sell, or similarly distribute Ghost Guns, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to persons who meet the description of (a) or (b) above.

231. Defendants knew or should have known that such persons are likely to use those Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to make Ghost Guns in a manner that is dangerous to the public, or to provide such products or completed Ghost Guns to secondary persons who are likely to use such products in a manner that is dangerous to the public.

232. Defendants further knew or should have known that selling or facilitating the sale of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to make Ghost Guns to any New Jersey resident would foreseeably harm New Jersey residents and the State because, amongst other things, Ghost Guns are far more difficult to police, regulate, and trace.

233. Defendants knew or should have known that their conduct in selling or facilitating the sale of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to make Ghost Guns would foreseeably harm New Jersey residents and the State of New Jersey.

234. Defendants' duties are further informed by New Jersey laws prohibiting the possession, assembly, and/or transport of Ghost Guns, Ghost Gun Kits, and Ghost Gun Frames. These laws are intended to curb violent gun crime, prevent access to guns by persons prohibited from possessing them, and protect public safety in New Jersey.

235. Defendants breached their duty of reasonable care to New Jersey residents and the State of New Jersey by selling or facilitating the sale of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts without adequate or reasonable procedures or restraints, as alleged herein.

236. Defendants knew or should have known that their conduct in selling or facilitating the sale of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts would result in substantial injuries and damages in New Jersey, including gun violence, gun crime, and other crime caused by Ghost Guns made from Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts.

237. Defendants' negligence has proximately harmed and continues to harm New Jersey residents, including through harm to gun violence victims injured by Defendants' purchasers (or secondary purchasers) using Defendants' Ghost Gun products. Defendants' negligence has furthermore proximately and foreseeably caused the State of New Jersey to expend excess monies for police (including overtime), laboratory costs, emergency services, coroner and morgue services, pension benefits, health care, social services, and other necessary facilities and services.

238. Defendants' negligence consists of knowing acts or omissions that also constitute knowing violations of N.J.S.A. 2C:58-35(a)(1), 2C:39-3(n), 2C:39-9(k), 2C:39-9(n), and 2C:39-3(j).

239. The Attorney General seeks appropriate remedies on behalf of the State and in the Attorney General's parens patriae capacity for the benefit of the general public and as are necessary to protect the safety, health, and welfare of New Jersey's residents.

240. Defendants' negligent actions and/or omissions were undertaken with actual malice or accompanied by wanton and willful disregard of persons who foreseeably might be harmed by those actions or omissions, within the meaning of the Punitive Damages Act, N.J.S.A. 2A:15-5.12. Defendants are therefore liable for punitive damages.

Count Six

(Negligent Entrustment)

241. The Attorney General repeats and realleges the allegations of the above paragraphs as if set forth at length herein.

242. At all relevant times, Defendants owed New Jersey residents and the State a duty of care as set forth herein.

243. The Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts sold by Defendant JSD and/or sold at shows operated by Defendant Eagle Shows to New Jersey purchasers were dangerous instrumentalities that Defendants knowingly placed into the hands of New Jersey residents and others likely to possess them in New Jersey or provide them to secondary persons in New Jersey.

244. Defendants had reason to know that this conduct entrusted dangerous instrumentalities to persons who were incompetent, unfit, inexperienced, and/or reckless in

possession of such instrumentalities, and/or were prohibited by New Jersey law from possessing such dangerous instrumentalities.

245. On information and belief, such individuals have foreseeably used Defendants' products to injure and/or kill New Jersey residents or others in the State of New Jersey.

246. Such harms are to foreseeable victims and are the natural and proximate result of Defendants' behavior.

247. Defendants' conduct has proximately harmed and continues to harm New Jersey residents, including through harm to gun violence victims injured by Defendants' purchasers (or secondary purchasers) using Defendants' Ghost Gun products. Defendants have furthermore proximately and foreseeably caused the State of New Jersey to expend excess monies for police (including overtime), laboratory costs, emergency services, coroner and morgue services, pension benefits, health care, social services, and other necessary facilities and services.

248. Defendants' negligent entrustment consists of knowing acts or omissions that constitute knowing violations of N.J.S.A. 2C:58-35(a)(1), 2C:39-3(n), 2C:39-9(k), 2C:39-9(n), and 2C:39-3(j).

249. The Attorney General seeks appropriate remedies on behalf of the State and in the Attorney General's parens patriae capacity for the benefit of the general public and as are necessary to protect the safety, health, and welfare of New Jersey's residents.

250. Defendants' negligent actions and/or omissions were undertaken with actual malice or accompanied by wanton and willful disregard of persons who foreseeably might be harmed by those actions or omissions, within the meaning of the Punitive Damages Act, N.J.S.A. 2A:15-5.12. Defendants are therefore liable for punitive damages.

Count Seven
(Civil Conspiracy)

251. The Attorney General repeats and realleges the allegations of the above paragraphs as if set forth at length herein.

252. Defendants Eagle Shows and JSD have agreed to work together, and in concert with one another, to commit the unlawful acts and acts through unlawful means described above.

253. Such acts are unlawful, or committed through unlawful means, because they violate, inter alia, N.J.S.A. 2C:58-35(a); common law public nuisance; and N.J.S.A. 2C:39:3(n), 2C:39-9(k), and 2C:39-9(n).

254. As to each of these laws, at least one Defendant has committed overt acts in furtherance of the violation thereof.

255. The Attorney General seeks damages in an amount to be proven at trial, including special damages resulting from:

- a. Injury and death to New Jersey residents;
- b. Health care costs and business loss to New Jersey residents;
- c. Additional State resources to deter, interdict, and mitigate crime effectuated or compounded by Ghost Guns—specifically, and among other things, additional compensation paid to law enforcement officials, the hiring of additional law enforcement officials, increased crime lab and ballistics costs, and other costs to enforce the laws Defendants have undermined, as well as increased public health costs, mental health costs, educational costs, and other costs; and
- d. Endangerment to, and the threat of endangerment to, the health, safety, peace, comfort, and convenience of New Jersey residents and law enforcement.

256. New Jersey seeks appropriate remedies to be proven at trial.

257. Defendants' conduct at issue consists of knowing acts or omissions that constitute knowing violations of N.J.S.A. 2C:58-35(a)(1), 2C:39-3(n), 2C:39-9(k), 2C:39-9(n), and 2C:39-3(j).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff the Attorney General of the State of New Jersey

respectfully requests judgment in his favor and against Defendants as follows:

- A. Ordering injunctive relief as is necessary to prevent continuing harm;
- B. Ordering Defendants to pay accrued and future costs that the State of New Jersey and any other person or entity incurs in abating the public nuisances that Defendants have created, maintained, or contributed to;
- C. Awarding the Attorney General monetary damages and punitive damages in an amount to be determined at trial, including interest thereon;
- D. Awarding the Attorney General restitution in an amount to be determined at trial;
- E. Awarding the Attorney General all costs and expenses incurred in connection with this action, including attorneys' fees; and
- F. Awarding the Attorney General such other and further relief as the Court deems just and proper.

Dated: December 12, 2023
Newark, NJ

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY
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CERTIFICATION OF COMPLIANCE

I certify that confidential personal identifiers will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b).

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

By: /s/ David Leit
David Leit
Assistant Attorney General

Dated: December 12, 2023
Newark, New Jersey

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Assistant Attorney General David Leit is hereby designated as trial counsel on behalf of the Plaintiff.

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

By: /s/ David Leit
David Leit
Assistant Attorney General

Dated: December 12, 2023
Newark, New Jersey