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25 **UNITED STATES DISTRICT COURT**
26 **CENTRAL DISTRICT OF CALIFORNIA**

27 UNITED STATES OF AMERICA,
28 Plaintiff,

v.

STATE OF CALIFORNIA and
ROBERT BONTA, in his official
capacity as head of the California
Department of Justice,
Defendants.

Case No. 8:2026-cv-1697

COMPLAINT

ACTION SEEKING STATEWIDE RELIEF

COMPLAINT

United States v. State of California, et al.

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1 Plaintiff, the United States of America submits the following Complaint
2 against Defendant State of California (the “State”) and Defendant Robert Bonta, in
3 his official capacity as the head of the California Department of Justice (the
4 “Department”).

5 I. INTRODUCTION

6 1. The Second Amendment to the United States Constitution declares that
7 “the right of the people to keep and bear arms shall not be infringed.” U.S. Const.
8 amend. II.

9 2. The Second Amendment protects the right of law-abiding citizens to
10 keep and bear arms in common use for lawful purposes. *District of Columbia v.*
11 *Heller*, 554 U.S. 570, 625 (2008). Because handguns are the most popular weapon
12 chosen by Americans for self-defense, a prohibition of their use is invalid. *Id.* at
13 629.

14 3. The right to keep and bear arms recognized in the Second Amendment
15 is made applicable to the states by the Fourteenth Amendment. *McDonald v. City*
16 *of Chicago*, 561 U.S. 742, 778 (2010).

17 4. Pursuant to Cal. Penal Code § 27595(a), it is illegal for California
18 firearms dealers to sell certain semiautomatic pistols. This statute is commonly
19 known as the “Glock Ban,” because it bans the sale of virtually all Glock and
20 Glock-style pistols. California’s ban on the sale of the most popular handgun in
21 America obviously violates the Second Amendment.

22 5. Moreover, to be sold at retail in California, a handgun must be listed
23 on the State’s official “Roster” of handguns. To be listed on the Roster, certain
24 handguns must have a chamber-load indicator (“CLI”) and a magazine-disconnect
25 mechanism (sometimes referred to as a magazine detachment mechanism)
26 (“MDM”). Until recently, these handguns were also required to have the ability to
27 transfer microscopic characters representing the handgun’s make, model, and serial
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1 number onto shell casings fired by the gun (commonly referred to as microstamping
2 capability). As a result of these requirements, no new handguns were added to the
3 Roster between 2013 and 2023, leading this Court to state the following in *Boland*
4 *v. Bonta*, 662 F. Supp. 3d 1077, 1092 (C.D. Cal. 2023):

5 Californians have the constitutional right to acquire and use state-of-
6 the-art handguns to protect themselves. They should not be forced to
7 settle for decade-old models of handguns to ensure that they remain
8 safe inside or outside the home. But unfortunately, the [statutes']
9 requirements do exactly that. . . . [T]hose requirements are
10 unconstitutional and their enforcement must be preliminarily enjoined.

11 6. The injunction entered in *Boland* is stayed pending appeal, and the
12 State’s legislature recently deferred the microstamping requirement until January 1,
13 2028. Nevertheless, for the reasons previously stated by this Court, these provisions
14 of the Roster statute violate the Second Amendment. Two weeks ago, the Supreme
15 Court noted that in a case such as this where “the government crosses the line from
16 permissible regulation into unconstitutional infringement, courts have a duty to say
17 so . . . no less in the Second Amendment context than in any other.” *United States*
18 *v. Hemani*, 608 U.S. ___, slip op. 4 (2026).

19 **PARTIES**

20 7. Plaintiff is the United States of America.

21 8. The State is a state within the United States of America.

22 9. Robert Bonta is the Attorney General of California. Cal. Gov’t Code
23 § 12510 states: “The Attorney General is head of the [California] Department of
24 Justice.” Attorney General Bonta is sued in his official capacity as the head of the
25 California Department of Justice and shall be referred to herein as the
26 “Department.”

27 **JURISDICTION AND VENUE**

28 10. This Court has jurisdiction over this action pursuant to 28
U.S.C. §§ 1331 and 1345.

1 11. The Court has authority to grant the remedies Plaintiff seeks pursuant
2 to the Violent Crime Control and Law Enforcement Act of 1994, 34 U.S.C. § 12601.
3 And the United States is authorized to initiate this action against the Defendants
4 under that Act.

5 12. The declaratory and injunctive relief that the United States seeks is
6 authorized by 34 U.S.C. § 12601(b) and 28 U.S.C. §§ 2201 and 2202.

7 13. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)
8 because a substantial part of the events or omissions giving rise to this action
9 occurred therein.

10 **GENERAL ALLEGATIONS**

11 **I. Standard of Review**

12 14. In *New York State Rifle & Pistol Ass’n, Inc. v. Bruen*, 597 U.S. 1
13 (2022), the Court set forth the following test for evaluating Second Amendment
14 claims:

15 We reiterate that the standard for applying the Second Amendment is
16 as follows: When the Second Amendment’s plain text covers an
17 individual’s conduct, the Constitution presumptively protects that
18 conduct. The government must then justify its regulation by
19 demonstrating that it is consistent with the Nation’s historical tradition
20 of firearm regulation.
21 597 U.S. at 24.

22 15. Under step one of the *Bruen* test, when the Second Amendment’s plain
23 text covers an individual’s conduct, the Constitution presumptively protects that
24 conduct. Another way of saying this is that a law that restricts conduct covered by
25 the plain text of the Second Amendment is presumptively unconstitutional.

26 16. At step two, the government (i.e., Defendants here) has an opportunity
27 to rebut any presumption of unconstitutionality that arose under step one by
28 demonstrating that its regulation is consistent with the Nation’s historical tradition

1 of firearm regulation. “Only then may a court conclude that the individual’s
2 conduct falls outside the Second Amendment’s ‘unqualified command.’” *Id.*

3 17. Thus, “when the Government regulates arms-bearing conduct, as when
4 the Government regulates other constitutional rights, it bears the burden to justify
5 its regulation.” *United States v. Rahimi*, 602 U.S. 680, 691 (2024) (internal citation
6 and quotation marks omitted).

7 **II. The Glock Ban**

8 **A. Regulatory Background**

9 18. It is illegal for a California licensed firearms dealer “to sell, offer for
10 sale, exchange, give, transfer, or deliver any semiautomatic machinegun-
11 convertible pistol.” Cal. Penal Code § 27595(a). Violations of the Glock Ban may
12 be punished by fine and the suspension or revocation of the offending dealer’s
13 license. *See id.* § 27595(b)(1)–(3).

14 19. Cal. Penal Code § 16885(a) defines a “semiautomatic machine-gun
15 convertible pistol” as:

16 [A]ny semiautomatic pistol with a cruciform trigger bar that can be
17 readily converted by hand or with common household tools . . . into a
18 machinegun by the installation or attachment of a pistol converter as a
19 replacement for the slide’s backplate without any additional
20 engineering, machining, or modification of the pistol’s trigger
21 mechanism.

21 Cal. Penal Code § 16885(a).

22 20. The paradigmatic handguns the sale of which Cal. Penal
23 Code § 27595(a) bans are manufactured by Glock. Accordingly, Plaintiff shall
24 refer to that statute as the “Glock Ban.” Plaintiff’s challenge to the statute is not,
25 however, limited to firearms manufactured by Glock. Plaintiff challenges the
26 restriction as to all pistols the sale of which is banned by Cal. Penal
27 Code § 27595(a).

1 21. A pistol converter is a device that can be attached to a pistol which
2 enables the pistol to fire automatically, meaning it will fire more than one round by
3 a single function of the trigger. *See* Cal. Penal Code § 17015. Thus, a pistol
4 converter is a device that transforms a semiautomatic pistol into a machinegun. The
5 California definition of “machinegun” includes pistol converters. *See* Cal. Penal
6 Code § 16880(b). Possession of a machinegun (including a pistol converter) is
7 prohibited. Cal. Penal Code § 32625(a). Neither Glock nor any manufacturer of
8 Glock-style pistols makes pistol converters. That prohibition is not at issue in this
9 case.

10 22. Apparently, the State believes it can outlaw perfectly legal and safe
11 firearms if those firearms can be converted into illegal firearms. This is not the law.
12 A legal shotgun can be turned into an illegal sawed-off shotgun in a matter of
13 seconds with a common hacksaw. Surely, this does not mean the State can outlaw
14 shotguns. A semiautomatic rifle can be converted into a machinegun, but
15 unmodified semiautomatic rifles are “widely accepted as lawful possessions.”
16 *Staples v. United States*, 511 U.S. 600, 612 (1994). The State’s argument is directly
17 contrary to the Court’s holding in *Staples*.

18 **B. The Glock Ban Is Presumptively Unconstitutional**

19 23. The United States has carried its burden at *Bruen* step one. The Glock
20 Ban makes it a crime to for a licensed firearms dealer to sell certain handguns. Thus,
21 the Glock Ban deprives the citizens of California of the opportunity to acquire those
22 handguns. “Common sense dictates that the right to bear arms requires a right to
23 acquire arms, just as the right to free press necessarily includes the right to acquire
24 a printing press, or the right to freely practice religion necessarily rests on a right to
25 acquire a sacred text.” *Ortega v. Grisham*, 148 F.4th 1134, 1143 (10th Cir. 2025).
26 Moreover, in *Bruen*, the Court cited with approval the Third Circuit’s decision in
27 *Drummond v. Robinson Twp.*, 9 F.4th 217 (3rd Cir. 2021). *Bruen*, 597 U.S. at 30.

1 In *Drummond*, the court held that laws “prohibiting the commercial sale of firearms
2 would be untenable in light of *Heller*.” *Drummond*, 9 F.4th at 227 (internal citation
3 and quotation marks omitted).

4 24. In summary, the Second Amendment’s plain text covers the conduct
5 of those law-abiding Californians who desire to buy and sell the handguns the sale
6 of which the Glock Ban prohibits. Therefore, the Constitution presumptively
7 protects that conduct. Another way of saying that is that the Glock Ban is
8 presumptively unconstitutional.

9 **C. Defendants Cannot Overcome the Presumption of**
10 **Unconstitutionality**

11 25. Defendants cannot rebut the presumption of unconstitutionality.
12 Glock and Glock style handguns are in common use. Indeed, as set forth in this
13 section, they are the most popular handgun in America. There is no historical
14 tradition analogous to a ban of a weapon in common use. *See Heller*, 554 U.S. at
15 629. It follows that there is no historical tradition of banning the purchase and sale
16 of a weapon in common use. A plaintiff is not required to prove common use as
17 part of their step one showing, but if they do prove common use, they necessarily
18 preclude the government from prevailing under step two. *See Bevis v. City of*
19 *Naperville, Illinois*, 85 F.4th 1175, 1209 (7th Cir. 2023) (Brennan, J., dissenting)
20 (Proving common use is a “sufficient condition” for finding an arm is protected
21 under the history and tradition test).

22 26. All factory-stock models of Glock pistols have a cruciform trigger bar.
23 This includes Glock’s “Gen 6” and “V series” pistols, which were introduced into
24 the U.S. market in late 2025. The cruciform trigger bar is integral to Glock’s design.
25 Among other things, it is a safety device that ensures that a Glock pistol will not
26 discharge accidentally if dropped.

1 27. The cruciform trigger bar was present in Glock’s patented design by
2 1982. See Frank Koppenhagen et al., *The Genesis of the Glock Pistol: How Gaston*
3 *Glock Created the Dominant Design for Handguns* (May 22, 2025),
4 <https://perma.cc/5D2W-M3Z7> (describing a 1982 Glock patent and noting the
5 trigger bar had a “cruciform shape”). It has thus been a feature of Glock pistols
6 since they were first sold in the U.S. in 1986. See *The Glock Story*, Glock,
7 <https://perma.cc/N92H-UXVG>.

8 28. When Glock’s Gen 3 patent expired in 2020, many companies began
9 producing handguns based on its exceedingly popular design. These pistols are
10 often referred to as Glock-style pistols. Common models include the Palmetto State
11 Armory Dagger, the Ruger RXM, and many Shadow Systems handguns.
12 Factory-stock versions of these Glock-style pistols are also designed with a
13 cruciform trigger bar.

14 29. Because factory-stock Glock and Glock-style pistols have a cruciform
15 trigger bar, they satisfy the Glock Ban’s definition of “machine gun convertible
16 pistol” because there is a substantial likelihood that virtually all Glock and
17 Glock-style pistols will be deemed to qualify as “readily convert[ible].”

18 30. The Supreme Court has already held that handguns are in common use
19 and cannot be banned. See *Heller*, 554 U.S. at 629 (“[H]andguns are the most
20 popular weapon chosen by Americans for self-defense in the home, and a complete
21 prohibition of their use is invalid.”).

22 31. Semiautomatic handguns with cruciform trigger bars are not different
23 from any other type of semiautomatic handgun in a constitutionally relevant way.
24 Semiautomatic handguns, including those with a cruciform trigger bar, therefore,
25 cannot be banned.

26 32. Even if Glocks are considered as their own group (which, under *Heller*,
27 they should not be), the Glock Ban is unconstitutional because Glock handguns, as
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1 a group, are also unquestionably in common use for lawful purposes. In fact, they
2 are the most popular handgun in the nation. *See, e.g., How Glock became America's*
3 *gun*, CBS NEWS (Sep. 15, 2013), <https://perma.cc/J5E8-42UA>.

4 33. Analysts estimate that, as of 2020, Glock held nearly 65% of the U.S.
5 market for handguns. *Gaston Glock & family*, Forbes (Apr. 5, 2021),
6 <https://perma.cc/6HWX-6FFP>.

7 34. According to one source, three Glock handgun models made the top
8 25 for new guns sold in 2024, placing fourth, seventh, and twenty-second. *See*
9 Logan Metesh, *Top Selling New Guns of 2024*, Guns & Ammo (Jan. 14, 2025),
10 <https://perma.cc/8A5Z-5VQN>.

11 35. ATF has observed that Glocks are “popular for civilian use.” *See*
12 *Definition of “Frame or Receiver” and Identification of Firearms*, 87 Fed. Reg.
13 24652, 24655 (Apr. 26, 2022).

14 36. Glock pistols consistently rank among the top-selling firearms in the
15 U.S. civilian market. *See, e.g., Best-Selling Guns*, Guns.com (May 5, 2026),
16 <https://perma.cc/9JGJ-ZXXN> (listing two Glock models in the top-five-selling
17 handguns).

18 37. Government data confirm the popularity of these types of handguns.
19 For example, in 2021, Glock manufactured 581,944 handguns in the United States.
20 *See Annual Firearms Manufacturing and Export Report* at 13, ATF (2021),
21 <https://perma.cc/T6FB-YCAY>. Of those, just 67,106 were exported. *Id.* at 153. It
22 follows that, in 2021 alone, Glock manufactured 514,838 handguns for sale in the
23 United States.

24 38. Moreover, in 2021, 5,263,341 handguns were imported into the United
25 States. *See Firearms Commerce in the United States* at 3, ATF (2024),
26 <https://perma.cc/P689-LX24>. Of those, 1,688,941 (nearly one-third of the total)
27 were imported from Austria, *id.* at 5, where many Glocks are manufactured. *See*
28

1 Glock, Glock Brand, <https://perma.cc/2UWY-EARR>. It is therefore likely that, in
2 2021 alone, Glock imported hundreds of thousands of handguns for sale in the
3 United States.

4 39. In summary, the handguns the sale of which the Glock Ban prohibits
5 are widely available for sale throughout the United States.

6 40. The Glock Ban bans the sale of constitutionally protected handguns.
7 Therefore, it violates the Second Amendment.

8 **III. The “Roster”**

9 **A. The Regulatory Scheme**

10 41. Under California’s so-called Unsafe Handgun Act (“UHA”), a
11 handgun may not lawfully be manufactured or sold on the primary market if it is
12 “unsafe.” Cal. Penal Code §§ 31910, 32000. An “unsafe handgun” is defined as
13 “any pistol, revolver, or other firearm capable of being concealed upon the person”
14 that does not meet firing reliability requirements, satisfy drop safety requirements,
15 or have certain safety features. *Id.* § 31910.

16 42. All handgun models that have been tested by a certified testing
17 laboratory and have been determined not to be “unsafe handguns” are added to an
18 official list known as the “Roster.” Cal. Penal Code § 32015. Admission to the
19 Roster is valid for one year and must be renewed annually with a fee. Cal. Code
20 Regs. tit 11, §§ 4070(a)-(b) & 4072(b).

21 43. Over time, the California legislature has changed what features a
22 handgun must have to be considered not “unsafe.” When it does so, handguns
23 previously on the Roster that do not have the newly required features are not
24 removed from the Roster, but rather are “grandfathered” and are still permitted to
25 be sold even though they now would be considered “unsafe.” *See* Cal. Penal Code
26 § 31910(a)(2)(D), (E); *Boland*, 662 F. Supp. 3d at 1081. However, for each
27 semiautomatic pistol newly added to the Roster, the Department is required to
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1 remove from the Roster three pistols lacking either a CLI or MDM. *See* Cal. Penal
2 Code § 31910(b).

3 44. Since 2007, to be eligible for primary market sale in California,
4 new-to-market semiautomatic pistols must have two safety features designed to
5 limit accidental discharges that occur when someone mistakenly believes no round
6 is in the chamber. First, a new-to-market centerfire semiautomatic pistol must have
7 a CLI, which is a device that indicates that a cartridge is in the firing chamber. Cal.
8 Penal Code §§ 16380, 31910(a)(2)(D). Second, a new-to-market centerfire or
9 rimfire semiautomatic pistol must have a MDM, which is a mechanism that prevents
10 a semiautomatic pistol that has a detachable magazine from operating to strike the
11 primer of ammunition in the firing chamber when a detachable magazine is not
12 inserted in the pistol. *Id.* §§ 16900, 31910(a)(2)(E).

13 45. Handguns on the Roster before 2007 that lack a CLI or MDM are
14 “grandfathered” and may still be sold. *See* Cal. Penal Code §§ 31910(a)(2)(D), (E)
15 (defining as “unsafe handguns” only those without the required features “not
16 already listed on the roster”).

17 46. Beginning in 2013, new-to-market semiautomatic pistols were also
18 required to include a feature called microstamping. This requirement mandated that
19 each pistol imprint microscopic arrays of characters that identify the make, model,
20 and serial number of the pistol onto the cartridge or shell casing of each fired round.
21 *See Boland*, 662 F. Supp. 3d at 1082. The microstamping requirement prevented
22 any new handgun models from being added to the Roster in the ten years from 2013
23 to 2023. *Id.* Indeed, a decade after the requirement took effect, no firearm
24 manufacturer in the world made a firearm with this capability. *Id.* California
25 recently postponed further implementation of the microstamping requirement to
26 January 1, 2028. The chamber-load indicator and the magazine-disconnect
27 mechanism requirements remain applicable.

1 47. As a result of these regulations, as of 2023, *none* of the handguns listed
2 on the Roster met the then-current definition of a handgun that is not “unsafe.” *Id.*
3 Not one of the handguns being sold in California had a CLI, MDM, and
4 microstamping ability. *Id.* Thus, every single handgun on the Roster was a
5 grandfathered handgun—one the California legislature deemed “unsafe.”

6 48. The UHA’s prohibition on sales of “unsafe” handguns is subject to
7 exceptions. It does not apply to sales to law enforcement personnel, personnel from
8 agencies including the Department, a police department, a sheriff’s official, a
9 marshal’s office, Department of Corrections and Rehabilitation, the California
10 Highway Patrol, and the district attorney’s office, or any member of the military.
11 *See* Cal. Penal Code §§ 32000(b)(4).

12 49. The UHA does not prohibit possessing Off-Roster handguns lawfully
13 acquired on the secondary market or lawfully transferred into California. *See id.*
14 § 32110. The result is that “unsafe” Off-Roster handguns may be purchased by
15 ordinary people on the secondary market from law enforcement officials and others,
16 often at a high markup. *Boland*, 662 F. Supp. 3d at 1082.

17 **B. The Roster Is Presumptively Unconstitutional**

18 50. The United States has carried its burden at *Bruen* step one. The
19 challenged UHA provisions unquestionably infringe on the right to keep and bear
20 arms because the UHA prevents California citizens from acquiring state-of-the-art
21 handguns for self-defense. *Boland*, 662 F. Supp. 3d at 1084. Therefore, the
22 Constitution presumptively protects that conduct, and the challenged provisions of
23 the UHA are presumptively unconstitutional. *Id.* at 1086.

24 **C. Defendants Cannot Overcome the Presumption of**
25 **Unconstitutionality**

26 51. The State has failed to proffer any historical regulation analogous to
27 the UHA’s chamber-load indicator, magazine-disconnect mechanism, and
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1 microstamping requirements. *Id.* at 1089. Accordingly, those requirements are
2 unconstitutional. *Id.*

3 **III. The Conduct of California Law Enforcement Officers Violates Section**
4 **12601**

5 52. The California Attorney General is head of the Department. Cal. Gov't
6 Code § 12510. The California Attorney General is the chief law enforcement
7 officer of the State, and it is his duty to see that the laws of the State are uniformly
8 and adequately enforced. *Steen v. App. Div. of Superior Ct.*, 331 P.3d 136, 141
9 (Cal. 2014); Cal. Const. art. V, § 13.

10 53. The Attorney General and special agents and investigators of the
11 Department are peace officers. Cal. Penal Code § 830.1(b). Their authority extends
12 to any place in the State where a public offense has been committed or where there
13 is probable cause to believe one has been committed.

14 54. The California Bureau of Firearms is one of the bureaus of the
15 Department's Division of Law Enforcement. Special Agents (sworn peace officers
16 under Penal Code § 830.1(b)) of the California Bureau of Firearms enforce the
17 State's firearms laws, including the Glock Ban and the UHA.

18 **IV. The United States Is Authorized to Bring this Action under Section**
19 **12601**

20 55. As pertinent to this action, 34 U.S.C. § 12601(a) ("Section 12601(a)")
21 states:

22 It shall be unlawful for any governmental authority, or any agent
23 thereof, or any person acting on behalf of a governmental authority, to
24 engage in a pattern or practice of conduct by law enforcement officers
25 . . . that deprives persons of rights, privileges, or immunities secured
26 or protected by the Constitution or laws of the United States.
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1 56. The State is a governmental authority, as that term is used in Section
2 12601(a).

3 57. The Department is a governmental authority, as that term is used in
4 Section 12601(a).

5 58. California Law Enforcement Officers (hereinafter, “CA LEOs”),
6 including CA LEOs employed by the Department, are fulfilling (and will continue
7 to fulfill unless enjoined) their statutory duty to enforce the State’s laws described
8 herein. When CA LEOs and the Department enforce these laws, they are engaging
9 in a pattern or practice of conduct by law enforcement officers.

10 59. As set forth above, these laws have been enforced in a manner that
11 violates the Second Amendment. Accordingly, there is a pattern or practice of
12 conduct by the CA LEOs that deprives persons of rights, privileges, or immunities
13 secured or protected by the Constitution. Therefore, Defendants are in violation of
14 34 U.S.C. § 12601(a).

15 60. 34 U.S.C. § 12601(b) states:

16 Whenever the Attorney General has reasonable cause to believe that a
17 violation of paragraph (1)¹ has occurred, the Attorney General, for or
18 in the name of the United States, may in a civil action obtain
19 appropriate equitable and declaratory relief to eliminate the pattern or
practice.

20 61. The United States brings this action pursuant to the authority set forth
21 in Section 12601(b) to remedy Defendants’ violation of Section 12601(a).

22 **FIRST CLAIM FOR RELIEF**
23 **(Violation of 34 U.S.C. § 12601(a))**
24 **(Second Amendment)**

25 62. Plaintiff incorporates and realleges all of the allegations set forth in the
26 previous paragraphs.

27 _____
28 ¹ [*sic*] This should state “paragraph (a).”

1 63. CA LEOs and the Department engaged in a pattern or practice of
2 conduct by law enforcement officers that deprived persons of rights secured and
3 protected by the Constitution in violation of 34 U.S.C. § 12601(a) by enforcing the
4 laws described herein.

5 64. Unless this Court enjoins Defendants and also grants the declaratory
6 relief the United States describes below, Defendants will continue to engage in the
7 pattern or practice of conduct that deprives law-abiding individuals of their Second
8 Amendment rights.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, the United States hereby prays that the Court grant the
11 following relief:

12 A. Entry of a declaratory judgment pursuant to 28 U.S.C. § 2201(b),
13 declaring that:

- 14 (1) The State is a “governmental authority” as that term is used in Section
15 12601(a);
- 16 (2) CA LEOs are “law enforcement officers” as that term is used in
17 Section 12601(a);
- 18 (3) When CA LEOs and the Department enforce the State’s laws
19 described herein, they are acting as agents of (or otherwise acting on
20 behalf of) the State;
- 21 (4) When CA LEOs and the Department enforce the State’s laws as
22 described above, they are engaging in a pattern or practice of conduct
23 by law enforcement officers; an
- 24 (5) The effect of that pattern or practice of conduct is to deprive the
25 citizens of their rights guaranteed by the Second Amendment and the
26 Fourteenth Amendment.
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1 B. Entry of permanent injunctive relief pursuant to Federal Rule Civil
2 Procedure 65 enjoining Defendants and their agents from enforcing the Glock Ban
3 and the provisions of the UHA described above, including an order that:

- 4 (1) Defendants and their agents and employees refrain from engaging in
5 any of the predicate acts forming the basis of the pattern or practice of
6 unlawful conduct described herein;
- 7 (2) Defendants and their agents and employees adopt and implement
8 policies and procedures to remedy the pattern or practice of unlawful
9 conduct described herein; and
- 10 (3) Defendants adopt systems that identify and correct conduct that
11 deprives persons of rights, privileges, or immunities secured or
12 protected by the Constitution or laws of the United States.

13 C. Such other and additional relief as the interests of justice may require.

14 Respectfully submitted this 1st day of July 2026.

15
16 /s/ Barry K. Arrington
17 Barry Arrington
18 Acting Chief
19 Second Amendment Section

20
21 /s/ Julie A. Hamill
22 Assistant United States Attorney
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