

SUPERIOR COURT OF WASHINGTON IN AND FOR KING COUNTY

CITY OF SEATTLE,

Plaintiff,

No.

v.

COMPLAINT

GLOCK, INC.; GLOCK GES.M.B.H.; BULL'S
EYE INDOOR RANGE, LLC; PANTEL
TACTICAL; and RAINIER ARMS, LLC,

JURY TRIAL DEMANDED

Defendants.

Plaintiff City of Seattle, by and through its undersigned attorneys of record, and upon personal knowledge as to their actions and upon information and belief as to Defendants' actions, allege as follows for their Complaint against Defendants:

I. INTRODUCTION

1. "Nearly a century after a federal crackdown on machine guns largely ended the use of automatic weapons by criminals, they are back on the rise thanks to Glock switches, an illegal modification that lets Glock-brand pistols fire continuously with one trigger pull."¹

2. The City of Seattle brings this action against Glock, Inc. and Glock Ges.m.b.H. (collectively, "Glock" or the "Glock Defendants") and three authorized Glock dealers in the greater Seattle area (Bull's Eye Indoor Range, LLC, Pantel Tactical, and Rainier Arms, LLC, collectively, the "Authorized Dealers"), for flooding the Seattle-area market with pistols that

¹ Zusha Elinson, *The \$50 Device That Turns Handguns Into Automatic Weapons*, Wall St. J. (Feb. 17, 2024, at 8:00 AM), <https://www.wsj.com/us-news/illegal-glock-switch-mississippi-shooting-f5471416?>.

1 can be easily converted into illegal machine guns.

2 3. Glock's pistols are uniquely susceptible to conversion using cheap, widely
3 available devices known as "Glock switches." These are also known as "machine gun
4 conversion devices" or "auto sears."



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16 **Figure 1.** A Glock with a switch. Source: "Glock Switches"
17 and Auto Sears, Smoking Gun, <https://smokinggun.org/glock-switches-auto-sears/> (last visited Aug. 29, 2025).

18 4. Before conversion, a Glock fires one bullet for each pull of the trigger. In contrast,
19 the converted weapon fires at rates up to 1,200 rounds per minute, turning ordinary pistols into
20 battlefield weapons used in drive-by shootings, ambushes, and mass shootings.²

21 5. Glock knows its pistols are being exploited this way. In March or April 2025, it
22 updated its website to include a Frequently Asked Question acknowledging (and giving hollow
23 lip service to discouraging) the modification of semiautomatic Glock pistols with machinegun
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26 ² Amanda Hernández, *States move to outlaw popular 'Glock switches' that make some guns fully automatic*, Mich. Advance (Apr. 23, 2025, at 5:36 PM), <https://michiganadvance.com/2025/04/23/states-move-to-outlaw-popular-glock-switches-that-make-some-guns-fully-automatic/>.

conversion devices.³ Yet Glock continues to manufacture, distribute, and profit from firearms that are easily modified into illegal machine guns.

6. Despite years of rising violence and growing alarm from law enforcement, Glock has made no meaningful effort to change its weapons or limit the spread of these conversions.

7. Instead, Glock's marketing is intended to increase the allure, desirability, and glorification of fully automatic weapons.

8. Glock's intentional choices both to profit from these convertible weapons and to refuse to sell safer weapons have fueled an epidemic: the Seattle Police Department reports increasing crimes involving converted Glockes.

9. These converted pistols are an increasingly common feature of urban gun violence, used by teens as young as 13, gangs, and traffickers precisely because of their appealing image, lethality, concealability, and easy modification.

10. Glock's conduct has created and sustained a public nuisance—endangering safety, straining public resources, and threatening the peace and security of Washington communities.

11. As the manufacturer of these pistols, Glock should bear responsibility for its decisions to continue profiting from weapons that are easily converted into machine guns, with devastating consequences to the City of Seattle. And the Authorized Dealers, located just outside the City of Seattle, contribute to the public nuisance by placing additional Glockes into the local gun trade.

II. PARTIES

12. Plaintiff, the City of Seattle (the "City" or "Seattle"), is a municipal corporation organized under the Seattle City Charter and the laws of the State of Washington, with approximately 760,000 residents. The City's principal offices are located at 600 Fourth Avenue, Seattle, Washington, 98104.

³ Compare *Frequently Asked Questions*, Glock, Inc., <https://us.glock.com/en/owners-resources/FAQs> (last visited Aug. 29, 2025), with *FAQs*, Glock, Inc. (Mar. 4, 2025), <https://us.glock.com/en/faqs> [<https://web.archive.org/web/20250304001553/https://us.glock.com/en/faqs>].

1 13. Under RCW 35.22.280, the City has specifically enumerated powers to abate
2 nuisances and regulate the carrying on within its corporate limits of occupations which are of
3 such a nature as to affect the public health or the good order of the City or disturb the public
4 peace.

5 14. The City's Police Department is the largest municipal law enforcement agency in
6 Washington state.

7 15. Defendant Glock, Inc. is a firearm importer, manufacturer, and dealer located in
8 Smyrna, Georgia. It is incorporated under the laws of the State of Georgia as a domestic for-
9 profit corporation with its principal place of business at 6000 Highlands Parkway SE, Smyrna,
10 Georgia, 30082. Glock earns hundreds of millions of dollars in annual revenue from its handgun
11 sales. Glock, Inc. is directly and materially involved in the assembly, design, marketing,
12 advertising, and distribution of Glock handguns to civilians, including those residing in the State
13 of Washington.

14 16. Defendant Glock Ges.m.b.H. ("Glock Limited") is an Austrian limited liability
15 company, with its principal place of business in Deutsch-Wagram, Austria.

16 17. Glock Limited and INC Holding GmbH, an Austrian holding company, jointly
17 own Glock, Inc.

18 18. Glock Limited designs, manufactures, assembles, markets, advertises, distributes,
19 and sells Glock handguns. Glock, Inc. then imports those handguns and component parts into
20 the United States. Glock, Inc. uses Glock Limited's component parts to assemble handguns that
21 are distributed throughout the United States, including to civilian residents of Washington.
22 Glock, Inc. is the only company in the United States with which Glock Limited directly does
23 business. Operating through Glock, Inc. and the Glock, Inc. dealer network, Glock Limited
24 knowingly places its handgun products into the stream of commerce, with the intention that those
25 products reach Washington civilian residents.

26 19. Glock Limited is the "center for the company's multifaceted operations." In

1 addition to producing Glock handguns at its production facility, Glock Limited operates a
2 “global administrative division, encompassing sales, logistics, exports, marketing, and
3 training.”⁴

4 20. Glock Limited and its founder and former CEO, Gaston Glock, created Glock, Inc.
5 to sell Glock’s products in the United States,⁵ including in Washington. Glock Limited
6 generates substantial revenue from these transactions.⁶

7 21. From the time of the creation of Glock, Inc., executives and other employees of
8 Glock Limited, including Gaston Glock, personally participated in, and directed the activities of,
9 Glock, Inc.⁷

10 22. Until his death in 2023, Gaston Glock maintained control over both Glock Limited
11 and Glock, Inc., operating both as a unified enterprise to sell Glock handguns. Gaston Glock
12 frequently traveled around the United States, from a home in Georgia, to market Glock
13 handguns.⁸

14 23. Glock Limited controls and directs the activities of Glock, Inc. so that it can access
15 the U.S. market, including the Washington market.⁹

16 24. For consumers and others, there is no meaningful distinction between Glock
17 Limited and Glock, Inc., presenting their marketing, sales, and service information using simply
18 the name “Glock.”

19 25. For many years, Glock Limited manufactured all Glock handguns that were sold in
20 the United States.

21 26. In 2013, Glock, Inc. began to manufacture handguns in the United States using
22 component parts supplied by Glock Limited from Austria. However, as of 2021, Glock Limited
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24 ⁴ Glenn Adam Kendrick, *Glock Annual 2024*, 33(1) GLOCK ANN. 1, 85 (2024), <https://us.glock.com/-/media/Global/US/old/US-Site/00-Owner-Downloads/2024-Annual-and-BG/GLOCK-ANNUAL-2024.ashx>.

25 ⁵ *Id.* at 9.

26 ⁶ Paul M. Barrett, *Glock: The Rise of America’s Gun* (2012).

⁷ *Id.*

⁸ *Id.*

⁹ *Id.*

1 still manufactured the majority of Glock handguns in Austria.¹⁰

2 27. Glock Limited controls the design and production standards used in Glock, Inc.’s
3 assembly facilities in the United States. According to Glock Inc., its American facility “follows
4 [the] same production standards and procedures as the facilities in Austria.”¹¹

5 28. Glock, Inc. and Glock Limited have conspired, and continue to conspire, with one
6 another to market and sell Glock handguns that can readily be switched into automatic weapons
7 by Washington civilians.

8 29. Glock, Inc. and Glock Limited are collectively referred to as “Glock” in this
9 Complaint.

10 30. Glock sells and distributes firearms to civilians in the United States, including in
11 Washington, primarily through firearms dealers. As part of this distribution network, Glock
12 maintains formal affiliate relationships with certain dealers, including approximately 36
13 Washington gun stores, and helps them market Glock products. Glock identifies these dealers
14 for the Washington public on its website.¹²

15 31. Bull’s Eye Indoor Range, LLC, is one such authorized dealer. Bull’s Eye Indoor
16 Range, LLC, is headquartered and incorporated in Washington. Bull’s Eye operates a gun range
17 and offers a variety of Glock pistols for sale to the public. Glock’s website identifies Bull’s Eye
18 as an authorized dealer and as one of the “best most trusted outdoor or indoor shooting range[s]
19 near you.”¹³

20 32. Pantel Tactical is another authorized dealer. Pantel is a sole proprietorship with a
21 license to do business in Washington and is headquartered at 16926 116th Avenue SE, Renton,
22 Washington, 98058. Pantel is a Glock authorized dealer and a so-called Blue Label Dealer, i.e.,
23 it is among those gun shops that can offer certain discounted Glock pistols to eligible military

24 ¹⁰ Charlie Gao, *Made in America: Why Glock Manufacturing Is Set to Grow in the United States*, Nat’l Int. (Aug. 6,
25 2021), <https://nationalinterest.org/blog/reboot/made-america-why-glock-manufacturing-set-grow-united-states-191274>.

26 ¹¹ *Glock*—Brand, Glock, Inc., <https://us.glock.com/en/about/brand/GLOCK-Brand> (last visited Aug. 31, 2025).

¹² *Dealer Locator*, Glock, Inc., <https://us.glock.com/en/Dealer-Locator-USA> (last visited Aug. 31, 2025).

¹³ *Id.*

1 and law enforcement members. Pantel offers a variety of Glock pistols for sale to the King
2 County public.

3 33. Rainier Arms, LLC is also an authorized dealer. Rainier Arms, LLC is
4 incorporated in Washington and headquartered at 2504 Auburn Way North, Auburn,
5 Washington, 98002. Rainier offers a variety of Glock pistols for sale to the King County public.

6 34. This Complaint refers to Bull’s Eye Indoor Range, Pantel Tactical, and Rainier
7 Arms, LLC collectively as the “Authorized Dealers.”

8 **III. JURISDICTION AND VENUE**

9 35. This Court has subject matter jurisdiction over the City’s causes of action, which
10 arise under Washington law.

11 36. This Court has personal jurisdiction over each Defendant under RCW 4.8.185.

12 37. This Court has personal jurisdiction over Glock, Inc. and Glock Limited. Glock,
13 Inc. and Glock Limited have purposefully availed themselves of the Washington market through
14 their distribution and marketing practices, including distribution and marketing into Seattle.

15 38. Glock contracts with national and regional distributors, including those serving
16 Washington dealers, ensuring that its firearms are routinely sold and marketed within the state.

17 39. Glock’s business model anticipates the presence of its firearms in Washington’s
18 retail market. This deliberate engagement with Washington’s marketplace reflects a clear intent
19 to benefit from consumers in the state.

20 40. Glock has also cultivated and maintained brand presence in Washington through its
21 advertising and promotional activities. Glock advertises widely across digital platforms and
22 firearm publications with national reach, including those that target civilian gun buyers in
23 Washington. Glock’s strategic engagement with Washington’s marketplace goes beyond mere
24 foreseeability—it reflects a clear intent to benefit from and serve consumers in the state.¹⁴

25 41. Glock, Inc. holds a Federal Firearms License (“FFL”) to manufacture and sell
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¹⁴ *Glock Events*, Glock, Inc. (Mar. 4, 2024), <https://us.glock.com/en/SHOOT/Events> [<https://web.archive.org/web/20240304022501/https://us.glock.com/en/SHOOT/Events>].

1 firearms, but Glock does not sell its pistols directly to consumers. Buyers must make the
2 purchase through Glock’s authorized dealers, who conduct the necessary background checks
3 and paperwork, or through other gun shops.

4 42. Glock maintains a network of authorized dealers across the United States,
5 including several dozen in Washington state. These dealers participate in programs such as the
6 Glock Stocking Dealer Program, which are designed to ensure the availability and promotion of
7 Glock firearms within the state.¹⁵

8 43. The Glock Stocking Dealer Program offers participating dealers benefits like
9 exclusive pricing on pistols, armorer’s course training, discounts on parts and apparel,
10 advertising materials, and inclusion in Glock’s marketing efforts, including the dealer locator.¹⁶
11 Through these programs, Glock sponsors firearms training events, known as “Glock Days,” in
12 Western Washington, where people can speak with a Glock representative and access exclusive
13 deals.¹⁷

14 44. In Western Washington, several dozen dealers are part of Glock’s authorized
15 network, including dealers in the cities of Auburn, Bellevue, Covington, Everett, Lake Tapps,
16 Lynnwood, Renton, Snohomish, Tacoma, and Woodinville.¹⁸

17 45. Glock also sells Glock pistols indirectly to Seattle and Washington consumers
18 through its website via a “Buy Now” link. The “Buy Now” link redirects consumers to third
19 party websites of authorized dealers that require the pistols to be picked up at a brick-and-mortar
20 location, including such authorized dealers as Defendants Bull’s Eye Indoor Range, Pantel
21 Tactical, and Rainier Arms, LLC.

22 46. These authorized dealers not only sell Glock products but also contribute to
23 Glock’s presence in Washington through marketing, customer service, and community
24 engagement. Their operations demonstrate Glock’s purposeful availment of the Washington

25 ¹⁵ *GLOCK Stocking Dealer Program*, Glock, Inc., <https://us.glock.com/dealers> (last visited Aug. 29, 2025).

26 ¹⁶ *Id.*

¹⁷ *Glock Events*, *supra* note 14.

¹⁸ *Id.*

1 market, supporting the exercise of specific personal jurisdiction over the company in the state.

2 47. The City's claims arise out of Glock's activities in Washington. The distribution of
3 Glock firearms within the state has facilitated their conversion and use in criminal activities,
4 leading to a public nuisance and harm to the City.

5 48. Exercising jurisdiction over Glock in Washington is reasonable and comports with
6 due process. Glock is a sophisticated corporation that regularly conducts business nationwide
7 and cannot claim unfair surprise when called to answer for harm caused by its products in a state
8 where it actively does business. The City has a manifest interest in protecting its residents from
9 the effects of easily converted weapons, and Glock should be required to defend its conduct in
10 the jurisdiction where that harm has taken root.

11 49. The Court also has personal jurisdiction over Bull's Eye Indoor Range, Pantel
12 Tactical, and Rainier Arms, LLC which are all headquartered in Washington and do business
13 here, business which includes the distribution of the easily converted Glock weapons in the
14 greater Seattle area.

15 50. Bull's Eye Indoor Range serves consumers in the Seattle area who purchase
16 firearms, including Glock pistols, either directly at its storefront in Tacoma, or via Glock's
17 website through the "Buy Now" link, and then picked up at Bull's Eye. Bull's Eye Indoor
18 Range also offers used guns and consignment.

19 51. Pantel Tactical serves consumers in the Seattle area who purchase firearms,
20 including Glock pistols, directly at its storefront in Renton, via Glock's website through the
21 "Buy Now" link and then picked up at Pantel Tactical, or via Pantel Tactical's website and
22 shipped to the store for pickup.

23 52. Rainier Arms, LLC serves consumers in the Seattle area who purchase firearms,
24 including Glock pistols, directly at its storefront in Auburn, or via Rainier Arms, LLC's website
25 and shipped to the store for pickup, or to other licensed firearm dealers within the Seattle city
26 limits.

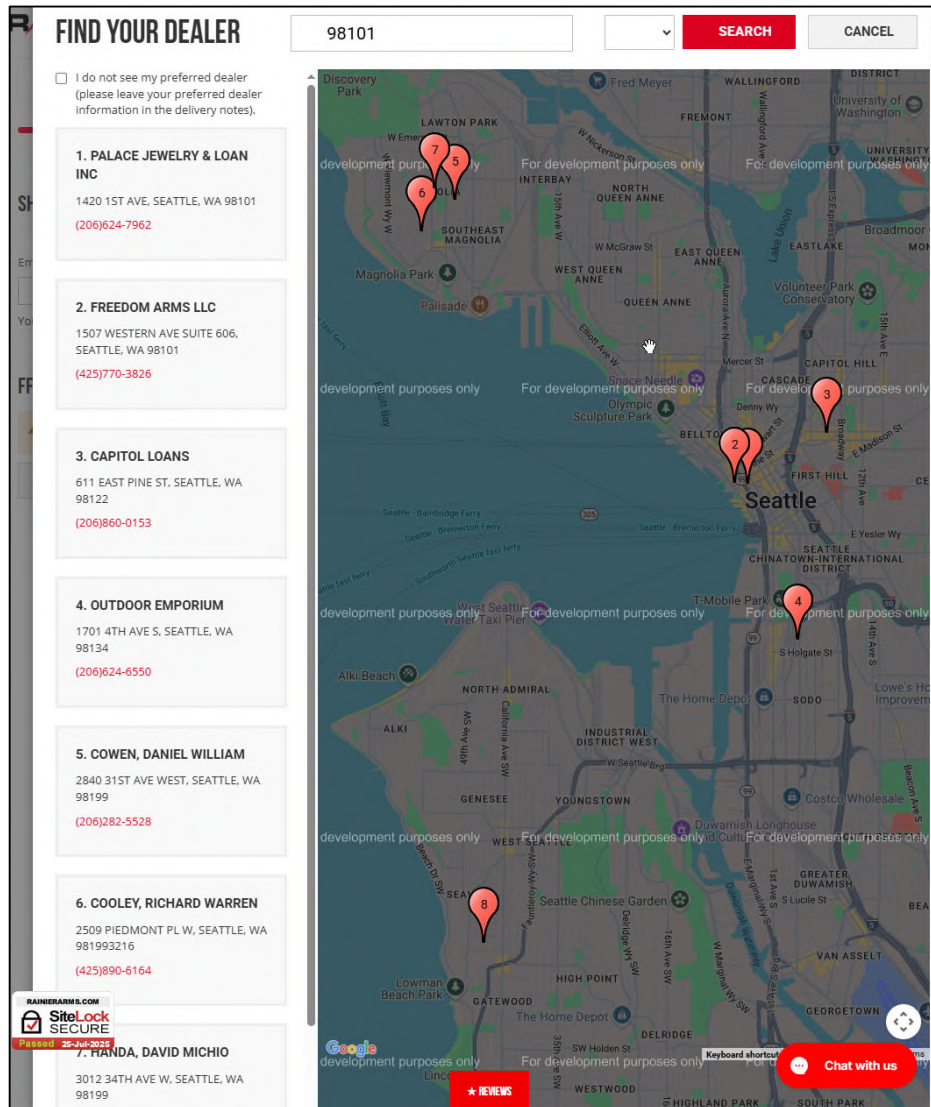


Figure 2. Source: *Dealer/FFL Locator*, Rainier Arms, <https://www.rainierarms.com/locator/partnership/dealerlist/> (last visited Aug. 29, 2025).

53. When buying a firearm from the Rainier Arms, LLC's website, purchasers are instructed to select an FFL dealer to which the firearm will be shipped. At least eight firearms dealers within Seattle's city limits are listed as potential shipping locations, including: Palace Jewelry & Loan, Inc; Freedom Arms, LLC; Capitol Loans; Outdoor Emporium; Graycloud Designs; and three individuals who are listed as federally licensed firearm dealers.

54. Venue is proper in King County Superior Court under RCW 4.12 because some part of the causes of action arise in this county, where the City of Seattle operates, and two of

the Authorized Dealers are located in King County.

IV. FACTUAL ALLEGATIONS

A. Glock designs, manufactures, markets, and sells semi-automatic handguns that can be easily converted into illegal, fully automatic machine guns using Glock switches.

55. Glock pistols are popular guns for civilians, law enforcement, and criminals alike.¹⁹

56. Glock pistols are among the most popular handguns in the world.²⁰

57. Glock originally sold its semi-automatic handguns for military use. Founder Gaston Glock designed the semi-automatic Glock 17 model for the Austrian Army.²¹

58. Later, the Glock 17 became the first Glock handgun released commercially in the United States, and it remains one of the most popular semi-automatic handguns in circulation today.²²



Figure 3. A Glock 17. Source: *Glock History*, Glock, Inc., <https://us.glock.com/en/about/History> (last visited Aug. 29, 2025).

59. The Glock 17 remains the foundation of Glock's handgun business. Other models differ in size, ammunition, or both, but have similar mechanics. Additional popular Glock

¹⁹ Steve Balesterieri, *Glock: The Most Popular Gun in America*, 1945 (Apr. 7, 2025), <https://www.19fortyfive.com/2025/04/glock-the-most-popular-gun-in-america/>.

²⁰ *GLOCK History: How it all started*, Glock, Inc. (Jan. 7, 2024), <https://us.glock.com/en/LEARN/Brand/History> [<https://web.archive.org/web/20240107140724/https://us.glock.com/en/LEARN/Brand/History>].

²¹ *Id.*

²² *Id.*

1 handgun models include the Glock 19 (a compact frame that shoots 9mm) and the Glock 45 (a
2 standard-sized frame that shoots 9mm). Over the years, Glock has also issued updated
3 “generations” of certain models—from the original Gen 1 to the latest Gen 5. These updated
4 models feature minor changes, such as the removal of finger grooves from the grip and
5 improved ergonomics for left-handed shooters.²³

6 60. In the U.S., Glocks dominate both the civilian and law enforcement markets.

7 61. Glocks are disproportionately represented in gun crimes across the country. Their
8 widespread availability, relatively low cost, and ease of concealment have made them a
9 common choice for illegal possession and criminal use.²⁴

10 62. Data from the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”)
11 consistently lists Glock as one of the top manufacturers of firearms traced in connection with
12 crimes. Between 2019 and 2023, the top three guns most frequently traced by ATF were all
13 made by Glock, accounting for over 74% of traced firearms.²⁵

14 63. Between 2017 and 2021, Glock 9mm pistols were the most frequently recovered
15 crime gun in Washington. Glock manufactured 31% of the 7,372 crime guns recovered in the
16 state during this period.²⁶

17 64. ATF reports that the top two most frequently recovered crime guns between 2017
18 and 2021 in the City were made by Glock. Glock manufactured 40% of the 1,112 crime guns
19 recovered in the City during this period.²⁷

20 65. One particular concern is the rising use of Glock pistols modified with “Glock
21 switches”—illegal devices that convert semi-automatic pistols into fully automatic machine

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23 ²³ *Glock Gen5 Pistols*, Glock, Inc., <https://us.glock.com/en/learn/glock-pistols/gen5?filter=gen5> (last visited Aug.
29, 2025).

24 ²⁴ *Report: Who Is Manufacturing the Guns Used in Crimes? City-Level Data on Crime Gun Recoveries*, Everytown
Rsch. & Pol’y (Sept. 26, 2024), <https://everytownresearch.org/report/city-level-data-crime-gun-recoveries/>.

25 ²⁵ *Part III: Crime Gun Tracing Updates and New Analysis* at 19, ATF, [https://www.atf.gov/firearms/docs/report/
nfcta-volume-iv-part-iii-%E2%80%93-crime-gun-tracing-updates-and-new-analysis/download](https://www.atf.gov/firearms/docs/report/nfcta-volume-iv-part-iii-%E2%80%93-crime-gun-tracing-updates-and-new-analysis/download) (last visited Aug.
29, 2025).

26 ²⁶ *NFCTA: Crime Guns—Volume 2 Report* at 5, ATF, [https://www.atf.gov/firearms/docs/report/washington-state-
report/download](https://www.atf.gov/firearms/docs/report/washington-state-report/download) (last visited Aug. 29, 2025).

²⁷ *Id.*

1 guns. These small, often 3D-printed or imported parts can be installed in seconds and have been
2 increasingly recovered by police departments in major cities, including Seattle.²⁸

3 66. The ease with which semi-automatic Glock pistols can be converted into fully
4 automatic machine guns makes them especially popular in the criminal market. Glock's failure
5 to correct this vulnerability allows criminals to circumvent federal and state prohibitions on
6 fully automatic weapons.

7 **1. Glock switches convert Glocks into fully automatic weapons.**

8 67. Devices that convert semi-automatic guns into fully automatic machine guns are
9 commonly known as “machine gun conversion devices” or “auto sears.”

10 68. A “Glock switch” is a type of auto sear that converts semi-automatic Glock
11 handguns into fully automatic weapons.

12 69. Glock switches are made from metal or plastic and are roughly the size of a dime.²⁹



23 **Figure 4.** A Glock switch. Source: Whitehurst, *infra* note 32.

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25 ²⁸ *Id.*

26 ²⁹ Bureau of Alcohol, Tobacco, Firearms and Explosives, ATF Firearms & Ammunition Technology Division Technical Bulletin 17-04 (“ATF Tech. Bull. 17-04”) (2017), *United States v. Freitas*, No. 20-cr-223 (N.D. Cal. May 29, 2020), ECF No. 42, Ex. 5; Champe Barton, *Glock could make it harder to outfit its pistols with switches—for a price*, Trace (Sept. 4, 2024), <https://www.thetrace.org/2024/09/glock-switch-lawsuits-pistol-design/>.

70. Attaching a Glock switch does not require specialized tools or skills:³⁰ the criminal just removes the plastic slide cover plate from the back of the handgun and attaches the Glock switch.^{31, 32}

71. The diagram below shows how a Glock can easily be made fully automatic with a Glock switch.³³

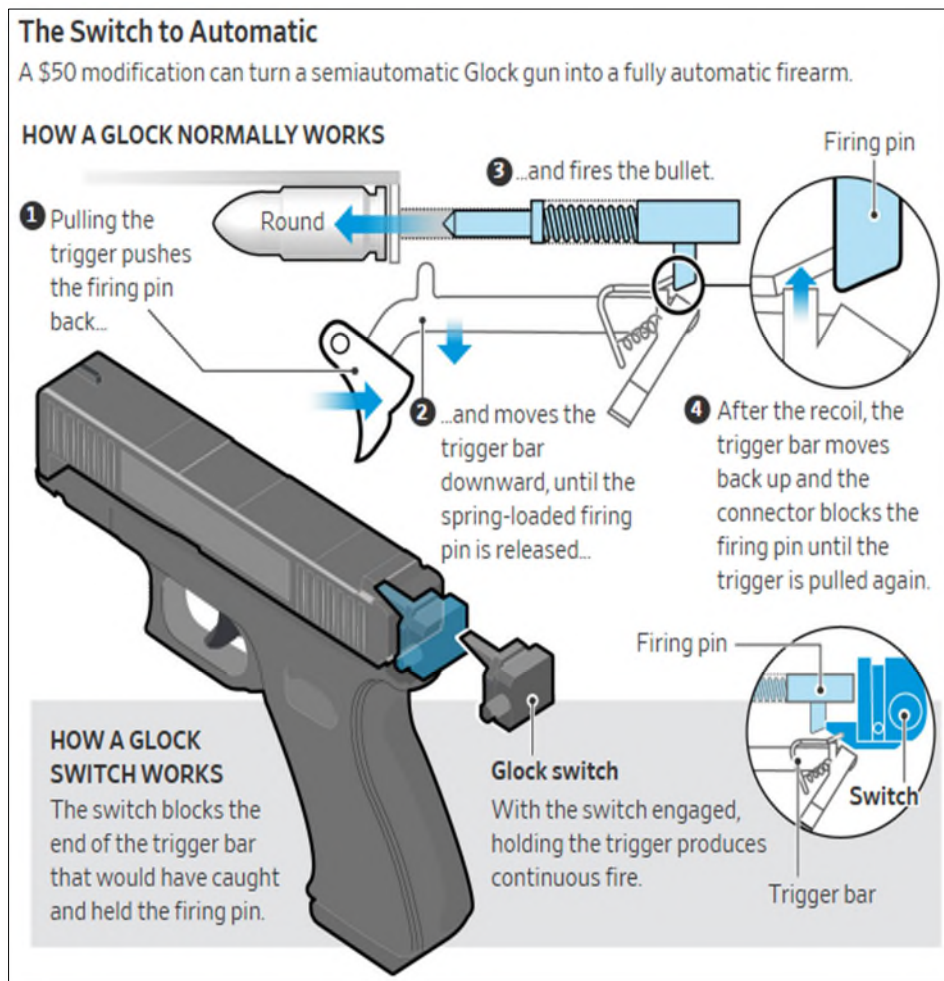


Figure 5. Source: Elinson, *supra* note 1.

72. Once installed, the switch overrides the firearm's internal mechanisms to enable

³⁰ Test. ATF Agent Michael Powell, *United States v. Williams*, No. 16-cr-89 (N.D. Fla. Mar. 7, 2017).

³¹ Elinson, *supra* note 1.

³² Lindsay Whitehurst, *A surge of illegal homemade machine guns has helped fuel gun violence in the US*, AP NEWS (Mar. 9, 2024, at 11:54 AM), <https://apnews.com/article/machine-guns-modified-illegal-switches-gun-violence-ddc2e9b6602ee1eb62e75732bbd54784>.

³³ *Id.*

continuous fire with a single trigger pull, effectively converting the semi-automatic pistol into a fully automatic machine gun, as depicted in the above diagram.³⁴

73. A converted Glock can fire up to 1,200 rounds per minute, posing a severe threat to public safety and law enforcement. Semi-automatic guns require a separate trigger pull to fire each bullet. In contrast, fully automatic guns fire successive bullets continuously with a single trigger pull until the trigger is released or the supply of ammunition is exhausted.³⁵

74. While Washington law prohibits the sale or import of magazines with more than ten rounds, larger high-capacity magazines can be purchased outside of the state and illegally imported to expand the capacity of Glocks to 50 rounds or more.³⁶ A converted Glock could fire all 50 rounds in less than five seconds.³⁷

75. This rapid fire makes fully automatic guns much harder to aim and control than semi-automatic guns, resulting in significantly more destruction and bystander casualties at crime scenes.

2. Glock's specifications facilitate the easy conversion of semi-automatic pistols into fully automatic machine guns.

76. Glock's semi-automatic handguns allow even a gun novice to convert a semi-automatic pistol into an illegal, fully automatic machine gun in only a few minutes using a device that can cost less than fifty dollars.³⁸

77. Glock's semi-automatic pistols are marketed and sold to civilians. A semi-automatic gun is a firearm that fires one round per trigger pull, automatically ejects the spent cartridge, and chambers the next round without requiring the shooter to manually cycle the

³⁴ See Elinson, *supra* note 1.

³⁵ Simple, Cheap Devices Can Turn Semiautomatic Firearms into Machine Guns, CeasefirePA.org (Jan. 3, 2025), <https://www.ceasefirepa.org/wp-content/uploads/2025/03/Machine-Gun-Converters-Factsheet-Jan-2025-Final.pdf>.

³⁶ KCI 50rd Drum Magazine for Glocks, GLOCKSTORE, <https://www.glockstore.com/50rd-Drum-Mag-for-Glocks> (last visited Aug. 29, 2025).

³⁷ Joel Eisenbaum, *HPD Shootout: Illegally modified gun used to injure 3 HPD officers shoots 50 rounds in 5 seconds*, KPRC Click2Houston (Jan. 28, 2022), <https://www.click2houston.com/news/local/2022/01/29/hpd-shootout-illegally-modified-gun-used-to-injure-3-hpd-officers-shoots-50-rounds-in-5-seconds/>.

³⁸ Elinson, *supra* note 1.

1 action. In other words, the user pulls the trigger once, and the gun fires one bullet. The gun uses
2 the recoil energy from the fired round to reload itself, making it ready to fire again with the next
3 trigger pull.³⁹

4 78. That same energy, used to reload, can also be used to fire another bullet, as in a
5 fully automatic weapon. But semi-automatic weapons have a “sear”—a small piece of metal that
6 prevents the gun from firing another bullet. An “auto sear” like a Glock switch overrides the
7 sear, allowing the gun to use the energy from one fired round to reload and fire another.⁴⁰

8 79. Glock pistols make overriding the sear very easy. In Glocks, the sear is simple (it
9 is combined into one piece with the trigger bar) and accessible (it is relatively large and
10 unprotected). This makes it easy to access and manipulate the sear—the only thing that prevents
11 semi-automatic Glocks from becoming fully automatic. Similar guns made by other
12 manufacturers block access to the sear and otherwise complicate installation of a machine gun
13 conversion device.⁴¹

14 80. Ironically, Glock markets the simplicity of its pistols as a safety feature.⁴²

15 81. Further facilitating access to the sear, the slide cover plate on Glock’s pistols is
16 very easy to remove. Removal requires no special training or tools and allows easy access to the
17 gun’s internal parts.^{43, 44} In Glock’s own words, Glock’s slide cover plate “drops right into your
18 slide” with “no tools required.”⁴⁵

21 ³⁹ This automatic reload distinguishes semi-automatic guns from manual firearms, where the user must manually
22 cycle the action to chamber the next round. In fully automatic firearms, a single pull of the trigger causes the gun to
fire continuously until the trigger is released, or the ammunition runs out.

23 ⁴⁰ Alain Stephens & Keegan Hamilton, *The Return of the Machine Gun*, Trace (Mar. 24, 2022), <https://www.thetrace.org/2022/03/auto-sear-gun-chip-glock-switch-automatic-conversion/>.

24 ⁴¹ *Id.*

25 ⁴² *Our Safe Action System*, Glock, Inc., <https://us.glock.com/en/learn/glock-pistols/safe-action-system> (last visited
Aug. 29, 2025).

26 ⁴³ Alain Stephens & Keegan Hamilton, *Tiny ‘Glock Switches’ Have Quietly Flooded the US With Deadly Machine
Guns*, Vice (Mar. 24, 2022), <https://www.vice.com/en/article/glock-switches-auto-sears/>; Barton, *supra* note 29.

⁴⁴ ATF Tech. Bull. 17 04, *supra* note 29.

⁴⁵ *Glock: Slide Cover Plate G17/G19 9mm Gen 5 Black*, Brownells, Inc., <https://www.brownells.com/gun-parts/handgun-parts/handgun-slides-parts/slide-cover-plate-gen5/> (last visited Aug. 29, 2025).

Description



Made in USA

The Glock® Gen5 Slide Cover Plate is a factory replacement part for the plate at the back of your Gen5 pistol's slide. Glock's Gen5 Slide Cover Plate **drops right in to your slide - no tools required** - to replace a broken, scratched, scuffed, cracked, or otherwise less-than-pretty original. The Glock® Gen5 Slide Cover Plate is molded from black polymer to match the rest of the slide, with a reinforcing stainless steel insert for strength.

Figure 6. Source: *Glock: Slide Cover Plate G17/G19 9mm Gen 5 Black*, *supra* note 45.

82. Glock's outsized responsibility for the problems generated by machine gun conversion devices illustrates how easy it is to modify Glocks compared to other handguns. The majority of weapons converted into illegal machine guns that Seattle Police have recovered in recent years are converted Glocks.⁴⁶

83. Indeed, online forums among Glock owners and enthusiasts illustrate how easy it is to install a Glock switch.⁴⁷ There are multiple online videos that provide step-by-step instructions that explain how to install a Glock switch.⁴⁸

3. Glock intentionally refuses to make its pistols safer.

84. Glock could make its trigger bar system more difficult to convert Glock semi-automatic handguns into illegal, fully automatic machine guns but has repeatedly and intentionally chosen not to do so.

85. If Glock were to require specialized tools and training to remove the slide cover

⁴⁶ Frank Main *et al.*, *In Chicago, handguns turned into high-capacity machine guns fuel deadly violence*, NPR (Oct. 28, 2022, at 5:00 AM), <https://www.npr.org/2022/10/28/1131026241/chicago-handgun-violence-auto-sear-machine-gun>.

⁴⁷ On GlockForum.net, one user said in a post that a Glock switch could be attached to a Glock handgun in minutes, after the slide was taken apart by an experienced armorer. Another user responded to clarify the ease of conversion: "What? For a Glock? No . . . it's a 10 *second* job to slip out the back plate and even less time to replace it with the sear. No 'taking the slide apart' and no 'armorer' needed." Thewolfchild, *Glock Talk and Discussion*, GlockForum.Net (Aug. 12, 2015), <https://www.glockforum.net/posts/133647/> (last visited Aug. 29, 2025). On Reddit, a user explained how simple it is for a person to attach a Glock switch: "So easy a child can do it. You can turn any Glock into full auto using a 3d printer." ThurstonLast, *r/Firearms*, Reddit.com (2022), https://www.reddit.com/r/Firearms/comments/xbqo7m/im_skeptical_criminals_supposedly_easily_convert/?rdt=40623.

⁴⁸ Letreactcom, *How to install glock full auto switch*, Facebook (June 20, 2022), <https://www.facebook.com/watch/?v=1185300678678624>; Knifehomes, *How to install glock full auto switch*, Facebook (Apr. 17, 2021), <https://www.facebook.com/watch/?v=227916132441449>.

plate or were to make the plate unremovable, converting Glock's handguns to fully automatic machine guns would be far more difficult.

86. Glock has told law enforcement officials that its handguns cannot be changed to make attaching Glock switches more difficult.⁴⁹ But Glock's past practices show otherwise.

87. In or around August 2017, Glock released a "fifth generation" for several of its semi-automatic handguns, including the Glock 17 and Glock 19. The "Gen 5" Glock handguns include a small tab on the rear of the frame that sticks up to cover the slide cover plate (shown on the left below). This tab was not present in earlier models like the Gen 4 (shown on the right in Figure 7).⁵⁰

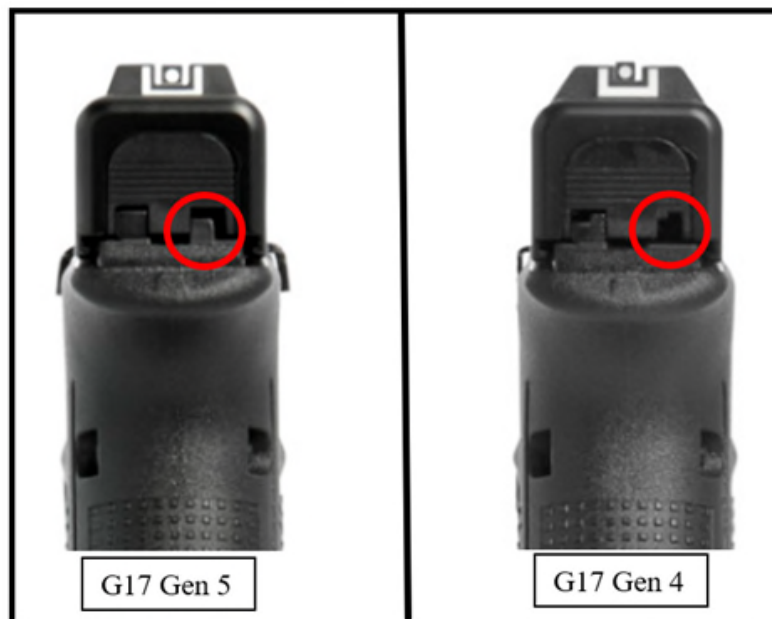


Figure 7. Source: *G17 Gen 5 & G17 Gen 4*, *supra* note 50.

88. Glock has not stated publicly that this tab was added in response to concerns about Glock switches; however, the tab makes attaching a Glock switch slightly more challenging and has no other evident purpose.

⁴⁹ Ernesto Londoño & Glenn Thrush, *Inexpensive Add-on Spawns a New Era of Machine Guns*, N.Y. Times (Aug. 12, 2023), <https://www.nytimes.com/2023/08/12/us/guns-switch-devices.html>.

⁵⁰ Compare *G17 Gen 5*, Glock, Inc., <https://us.glock.com/en/pistols/g17-gen5-fs-us> (last visited Aug. 29, 2025) (screenshot generated using 3D rotation feature), with *G17 Gen 4*, Glock, Inc., <https://us.glock.com/en/pistols/g17-gen4> (last visited Aug. 29, 2025) (screenshots generated using 3D rotation feature; circles added for emphasis).

1 89. Unfortunately, the tab is so easy to remove that it provides no meaningful deterrent
2 to the attachment of a Glock switch. The tab can be easily removed using a metal file without
3 technical knowledge or specialized tools. Online videos explain how easy it is to remove the tab
4 in only a few minutes.⁵¹ Glock's Gen 5 handguns remain essentially as easy to convert to fully
5 automatic machine guns as previous models.

6 90. In fact, since Glock introduced the Gen 5 models, Glock switches have exploded in
7 popularity despite the tab's addition.

8 91. Since 2023, the Seattle Police Department has recovered nearly a dozen Gen 5
9 Glocks with switches.

10 92. Although the tab's addition was and continues to be an ineffective solution to the
11 problem of Glock switches, its introduction shows that Glock has been aware of the problem of
12 Glock switches for years and could have made additional, more effective changes.

13 93. At the same time, Glock continues to market and sell its earlier models, such as the
14 Gen 3 pistols, without the tab, to civilians.

15 94. A Glock handgun that is not susceptible to the use of switches—the G46—also
16 shows that, if it genuinely wanted to, Glock could thwart conversion of its handguns into illegal
17 fully automatic machine guns. In the G46, the slide cover plate and striker comprise a single
18 metal piece. As a result, the slide cover plate cannot be removed to attach a switch without
19 disabling the gun; however, this model is only available to limited law enforcement units in
20 Europe and is not marketed or sold within the United States.

21 **4. Glock switches are inexpensive, readily available, and easy to install.**

22 95. It is distressingly easy to acquire a Glock switch. As former U.S. Deputy Attorney
23 General Lisa Monaco described it, "They're cheap. They're not hard to manufacture, often with
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⁵¹ Royal Range USA, *Full Auto Glock17 GRN5!!!*, YouTube (Aug. 30, 2017), <https://www.youtube.com/watch?v=JSIX0HsczlY>.

1 3-D printers.”⁵²

2 96. Some overseas Glock switch manufacturers sell their products directly to U.S.
3 consumers through foreign companies like Alibaba (a China-based retailer); other
4 manufacturers do so through U.S. companies. In January 2019, law enforcement recovered five
5 Glock switches from the home of an individual who bought them on Wish.com, a U.S.-based
6 retailer, for \$10 each.⁵³

7 97. Recently, federal authorities seized over 350 internet domains that were used to
8 import and sell auto sears, including Glock switches.⁵⁴ Despite ATF efforts, Glock switches are
9 still readily available for purchase online.

10 98. As of August 29, 2025, Glock switches can also be purchased from
11 vitowhisper.com. The website includes step-by-step instructions for installation.⁵⁵

12 99. Glock switches can also be produced using 3D printers and downloadable
13 blueprints that are readily available. Investigators with the New Jersey State Commission of
14 Investigation, who had no prior experience with 3D printing technology, were able to print a
15 switch in just 12 minutes for less than one dollar (not including the price of the printer).⁵⁶

16 100. Jonathan Blais, the Special Agent in Charge of the Seattle Field Division of ATF
17 stated that individuals “can easily find these devices anywhere: on the internet, through sources,
18 they are being made overseas and imported, they are being made here locally with the
19 prevalence of 3D printing.”⁵⁷

20 ⁵² Deputy Attorney General Lisa Monaco Delivers Remarks on Combating the Production of Unlawful Machinegun
21 Conversion Devices, U.S. Dep’t Just. (Sept. 6, 2024), <https://www.justice.gov/archives/opa/speech/deputy-attorney-general-lisa-monaco-delivers-remarks-combating-production-unlawful>.

22 ⁵³ Def.’s Sentencing Mem., *United States v. Abadilla*, No. 19-cr-00072-VC (N.D. Cal. May 3, 2021).

23 ⁵⁴ Press Release, *Federal Authorities Seize Over 350 Website Domains Used to Import Illegal Switches and Silencers from China*, U.S. Att’y’s Off. Dist. Mass. (Sept. 11, 2024), <https://www.justice.gov/usao-ma/pr/federal-authorities-seize-over-350-website-domains-used-import-illegal-switches-and>.

24 ⁵⁵ *Gen1-4 Full Auto Selector Switch Stainless Steel for Glock G17 G19 G22 G23 G26*, VitoWhisper, <https://vitowhisper.com/product/full-auto-glock-selector-switch-vwgsfass4/> (last visited Aug. 29, 2025).

25 ⁵⁶ *Illegal Firearms: Use & Trends In New Jersey* at A-6, N.J. Comm’n Investigation (Sept. 2024), <https://nj.gov/sci/home/sci-finds-existing-state-laws-need-revision-to-better-combat-homemade-ghost-guns-and-modified-firearms/documents/2024-10-SCI-Illegal-Firearms-Report.pdf>.

26 ⁵⁷ AJ Janavel, *Illegally-modified machine guns causing concern for law enforcement*, Fox 13 Seattle (Aug. 27, 2024, at 5:59 PM), <https://www.fox13seattle.com/news/illegally-modified-machine-guns-hitting-streets-causing-concern-law-enforcement>.

B. Converted Glockes have harmed Seattle residents and are draining the resources of local law enforcement.

1. State and federal laws ban machine guns.

101. Machine guns have been heavily regulated by both Washington law and federal law since the 1930s because of the immense danger posed by automatic gunfire and the frequent use of machine guns in crimes, including gangland massacres.⁵⁸

102. Since 1933, Washington has outlawed “any machine gun, or any part thereof.” Any fully automatic weapon is a “machine gun” under Washington law, which defines the term to include any “mechanism or instrument not requiring that the trigger be pressed for each shot and having a reservoir clip . . . for storing, carrying, or supplying ammunition which can be loaded into the firearm . . . and fired therefrom at the rate of five or more shots per second.” RCW 9.41.010(31). For civilians, it is a Class C felony to own or possess a machine gun or “any part designed and intended solely and for use in . . . converting a weapon into a machine gun.” RCW 9.41.190.

103. Federal law also prohibits the sale, possession, or transfer of a machine gun to any person who is not specifically authorized by the Attorney General. 18 U.S.C. § 922(b)(4),(o). The term “machine gun” is defined to include machine gun conversion devices. 26 U.S.C. 5845(b).

104. These gun laws virtually eliminated automatic weapons from city streets for decades. But unfortunately, because of Glock switches, “now machine guns are back, and they’re everywhere.”⁵⁹

2. Glock switches wreak havoc in Seattle.

105. The Seattle Police Department tracks the number of shell casings recovered at each shooting incident. A significant increase in the number of shell casings could reflect an increase

⁵⁸ National Firearms Act, S. 2, 73d Cong., 48 Stat. § 1236 73d (1934).

⁵⁹ Scott Glover & Curt Devine, *A device that can turn a semi-automatic weapon into a machine gun in moments is wreaking havoc on American streets*, CNN (Aug. 30, 2022, at 9:05 PM), <https://www.cnn.com/2022/08/30/us/automatic-machine-gun-fire-invs/index.html>.

1 in the use of automatic guns, such as converted Glockes. The number of shell casings that the
2 Seattle Police recover each week has increased dramatically from 2020 to 2024.⁶⁰ In 2020, SPD
3 recovered 2,514 casings total, and in 2023, it was 5,746.⁶¹ This finding may reflect the rising
4 popularity of machine gun conversion devices like the Glock switch.

5 106. The City's then-Chief of Police Adrian Diaz expressed concern about converted
6 Glockes following a 2024 shooting in SODO in which about 80 rounds were fired. He explained
7 that "One of the biggest hardships we are seeing is the amount of rounds being fired at this city.
8 . . . Four years ago we had 2,500 rounds fired. [In 2023] we had over 5,700 rounds fired. Not just
9 double, more than double." Converted Glockes "allow[] somebody to switch [a] gun to automatic
10 and fire 50 rounds in a matter of seconds."⁶²

11 107. Glock switches are growing in popularity, both nationwide and in Seattle,
12 contributing to the rise in gun violence. Machine gun conversion devices like the Glock switch
13 "are now the most frequently recovered type of illegal firearm, accounting for almost 55% of
14 the firearms recovered in ATF trafficking investigations between 2017 and 2021."⁶³

15 108. The National Firearms Commerce and Trafficking Assessment published by ATF
16 reported that the number of machine gun conversion devices recovered in crimes and traced by
17 ATF increased more than 784% between 2019 and 2023.⁶⁴ Over 11,000 such devices were
18 recovered and traced during this period; however, "there are likely much higher numbers of
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20

21 ⁶⁰ *Seattle Shots Fired Trends by Category* at 11, Seattle Police Dep't (July 31, 2024), <https://www.seattle.gov/documents/Departments/CityAuditor/auditreports/Gun%20Violence%20Audit/BasicShotsTrendsbyCategory.pdf>.

22 ⁶¹ *Id.*

23 ⁶² Jeremy Harris, *80 rounds fired in SODO shootout, Seattle police say*, KOMONews (Feb. 21, 2024 at 11:46 AM),
<https://komonews.com/news/local/seattle-shooting-shootout-sodo-police-80-rounds-shell-casings-weekend-hospital-injuries-leg-victim-suspects-three-gun-firearm-violence-crime-crisis-washington-king-county-adrian-diaz-tommygun-magazines-investigation-weapon>.

24 ⁶³ Mem. from Deputy Att'y Gen., *Combating Illegal Machine Conversion Devices through Enhanced Enforcement, Training, and Intelligence Sharing*, U.S. Dep't Just. (Sept. 6, 2024), <https://www.justice.gov/archives/media/1366606/dl>.

25 ⁶⁴ *Three Years Since a Gun Equipped With a Glock Switch was Used in a Mass Shooting in Sacramento, Now is the Time for California to Get DIY Machine Guns Off Our Streets*, Everytown Rsch. & Pol'y (Apr. 3, 2025),
26 <https://www.everytown.org/press/three-years-since-a-gun-equipped-with-a-glock-switch-was-used-in-a-mass-shooting-in-sacramento-now-is-the-time-for-california-to-get-diy-machine-guns-off-our-streets/>.

recovered [devices] at law enforcement agencies that have not been submitted for tracing.”⁶⁵

109. On September 26, 2024, former President Biden issued an executive order that identified the threat posed by 3D printed machine gun conversion devices.⁶⁶ A report prepared in response to this order found that law enforcement agencies recovered approximately 12,374 machine gun conversion devices between January 1, 2020 and October 24, 2024.⁶⁷

110. The nation-wide rise in the popularity of machine gun conversion devices such as Glock switches is clearly present in Seattle.

111. The Seattle Police Department recovered one or more machine gun conversion devices in 20 separate incidents in 2023—the first year the Department began tracking this data. In 2024, the number of incidents rose to 38.

112. In June 2024, Seattle police recovered a bundle of 100 uninstalled Glock switches.

113. It is likely that many more converted Glocks have been used in crimes in the area but have not yet been recovered.⁶⁸

114. In many cases, the converted Glocks that police recover in connection with crimes have been stolen from their original owner.⁶⁹ The annual number of guns that were reported or recorded as stolen in Seattle has increased steadily from 332 in 2018 to 465 in 2023.⁷⁰

115. The use and possession of converted Glocks has terrorized the Seattle public in public spaces.

⁶⁵ Part V: *Privately Made Firearms Updates and New Analysis* at 5, ATF, <https://www.atf.gov/firearms/docs/report/nfcta-volume-iv-part-v-%E2%80%93-pmf-updates-and-new-analysis/download> (last visited Aug. 29, 2025).

⁶⁶ Executive Order 14127—*Combating Emerging Firearms Threats and Improving School-Based Active-Shooter Drills*, 89 Fed. Reg. 80345 (Sept. 26, 2024), <https://www.govinfo.gov/content/pkg/DCPD-202400831/pdf/DCPD-202400831.pdf>.

⁶⁷ *Id.* at n.3.

⁶⁸ Janavel, *supra* note 57.

⁶⁹ See, e.g., Julia Pak, *Teen arrested for allegedly pointing gun at other student outside Tacoma high school*, News Trib. (May 9, 2025, at 6:31 PM), <https://www.thenewstribune.com/news/local/article306036271.html>; Maya Tizon, *Lynnwood man arrested, released on \$25K bond after road rage shooting*, HeraldNet.com (Sept. 22, 2023, at 3:48 PM), <https://www.heraldnet.com/news/lynnwood-man-arrested-released-on-25k-bond-after-road-rage-shooting/>; Nia Wong, *3 teens arrested for flashing modified guns at Chinatown Seafair Parade*, Fox 13 Seattle (July 22, 2024, at 10:29 PM), <https://www.fox13seattle.com/news/teens-arrested-flashing-modified-guns-chinatown>.

⁷⁰ Claudia Gross Shader, PhD *et al.*, *Four Recommendations to Better Understand and Address Current Gun Violence Patterns in Seattle* at 25, Seattle Off. City Auditor (Mar. 25, 2025), <https://www.seattle.gov/documents/Departments/CityAuditor/auditreports/GunViolenceAuditFinalReport.pdf>.

1 116. In February 2023, Seattle police arrested a teenager with a converted Glock and an
2 extended magazine after a car chase. The teenager was driving a car that had been stolen at
3 gunpoint from an 83-year-old woman. Following the incident, then-Assistant Chief Eric Barden
4 of the Seattle Police Department said, “I’ve never known a time where we’ve had the number of
5 high round incidents that we have.”⁷¹

6 117. In July 2024, a 13-year-old boy and two 14-year-old boys were arrested for
7 flashing guns at the Seafair Parade in Seattle. Two of the guns that the officers recovered were
8 converted Glocks, one of which was modified with a 30-round extended magazine.⁷²

9 118. In May 2025, three people were shot to death and a fourth seriously wounded in
10 Pioneer Square in Seattle. King County Prosecutors said the gun used in that shooting was a
11 converted Glock. “We’re seeing now, in cases referred to us, dozens and dozens of rounds that
12 are being fired where 10 years ago or even five years ago you didn’t see as many scenes where a
13 high number of rounds are being fired like that,” King County Prosecuting Attorney’s Office
14 spokesperson Casey McNerthney said.⁷³ Gary Ernsdorff, a senior prosecutor in that office,
15 explained: “It’s the new status symbol. . . . It used to be a revolver. Then it was a Glock. Now
16 it’s a Glock with a switch.”⁷⁴

17 119. In August 2025, a converted Glock was used in a shooting in Seattle’s Queen Anne
18 neighborhood that left a man seriously injured from multiple gunshot wounds to his leg.⁷⁵

19 120. Converted Glocks have also been involved in other Western Washington crimes.

21 ⁷¹ Jeremy Harris, *Illegal ‘Glock switch’ blamed for increase of rounds being fired in western Washington shooting*,
22 16 KMTR (Oct. 7, 2023, at 11:02 AM), <https://nbc16.com/news/local/illegal-glock-switch-blamed-for-increase-bullets-rounds-fired-in-western-washington-shootings-ghost-guns-atf-machine-gun-gun-violence-crime-firearms-law-enforcement-police-seattle-spd-chief-adrian-diaz-investigations>.

23 ⁷² Wong, *supra* 69.

24 ⁷³ Luke Duecy, *Shooting in Pioneer Square breaks out hours after Seattle Police Chief vows crackdown on violence*, MyNorthwest (May 20, 2025, at 9:44 AM), https://mynorthwest.com/crime_blotter/seattle-medics-shooting/4089854.

25 ⁷⁴ Charlie Harger, *King County shootings drop, but kids with ‘Glock switch’ machine guns are the new warning sign*, KIRO News Radio (May 19, 2025, at 5:01 AM), <https://mynorthwest.com/seattles-morning-news/glock-shootings-teens/4088781>.

26 ⁷⁵ KOMO News Staff, *Seattle police investigate shooting near Bhy Kracke Park, man injured*, KOMO News (Aug. 10, 2025, at 4:27 PM), <https://komonews.com/news/local/seattle-police-investigate-shooting-near-bhy-kracke-park-man-injured-crime-glock-handgun-playground-summer-investigation-witness>.

1 121. In September 2023, police arrested a 20-year-old Lynnwood resident in connection
2 with a road rage shooting. When searching the suspect's apartment, investigators found a
3 converted Glock.⁷⁶

4 122. In October 2023, police were dispatched to an auto-glass repair shop after
5 employees reported seeing firearms in a customer's trunk and bullet holes in his vehicle. When
6 the police arrived, the customer went into the bathroom. Police later found two guns stashed in
7 the cabinet below the sink, one of which was a converted Glock. A search of the man's car
8 revealed five additional firearms, including a rifle equipped with an auto sear, hundreds of
9 rounds of ammunition, body armor, and two improvised explosive devices.⁷⁷

10 123. In February 2024, a shooting in Tacoma left two people with life-threatening
11 injuries. The next day, Pierce County detectives arrested the main suspect and his friend, who
12 had a loaded Glock handgun with an extended magazine and a full-auto switch.⁷⁸

13 124. In August 2024, the Pierce County Sheriff's Deputies arrested a 21-year-old
14 suspect with a converted Glock.⁷⁹

15 125. In May 2025, a 16-year-old student at Silas High School in Tacoma was arrested
16 for pointing a gun at another student in the school parking lot. The victim told police that he was
17 riding in the back seat of a friend's car when the suspect pointed the gun at him through the
18 windshield. Police recovered a converted Glock 19 from the suspect's vehicle. The Glock was a
19 Gen 5—the generation that has a small plastic protrusion that supposedly makes it more difficult
20 to attach a switch.⁸⁰

21 126. A chilling aspect of the surge in Glock switches is its effect on minors. Many
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23 ⁷⁶ Tizon, *supra* note 69.

24 ⁷⁷ Press Release, *Pierce County man indicted for unlawful possession of firearms—including machine guns*, U.S.
Att'y's Off. W.D. Wash. (Nov. 9, 2023), <https://www.justice.gov/usao-wdwa/pr/pierce-county-man-incited-unlawful-possession-firearms-including-machine-guns>.

25 ⁷⁸ PCSD, *Two Suspects Arrested for Overnight Shooting at Sprinkler Center*, Pierce Cnty. Sheriff's Off. Blotter
26 (Feb. 27, 2024), <https://blog.piercecountywa.gov/pcsd blotter/2024/02/27/two-suspects-arrested-for-overnight-shooting-at-sprinkler-center/>.

⁷⁹ Janavel, *supra* note 57.

⁸⁰ Pak, *supra* note 69.

incidents involving Glock switches, both in the Seattle area and nationwide, involve teenagers as either the victim, the assailant, or both.

127. The frequency of Seattle shooting incidents that involve minors has risen steadily between 2021 and 2024.⁸¹

128. As converted Glocks have become more prominent, the “rules” of gun use have shifted, partly due to Glock’s glorification of automatic weapons as “fun.” As a result, the view that converted Glocks are a “status symbol” and provide a “competitive advantage” has raised the stakes of gun-related violence in Seattle and across the country.⁸²

3. Converted Glocks drain Seattle’s resources.

129. The surge in availability of Glock switches has also placed a significant drain on the resources of the Seattle Police Department. Not only do converted Glocks increase the number of victims of gun violence, but also the indiscriminate spraying of bullets significantly increases the number of shell casings found at crime scenes. When the number of shots fired is elevated, the officer and investigator time needed to collect casings and conduct forensic investigations greatly increases.⁸³

130. After an incident of gun violence in Seattle, the response is time—and resource—intensive for the Seattle Police Department. First, the victims receive emergency first aid, and the scene is secured. Next, the shell casings are all flagged and marked, and then research is conducted to determine the source of the casings and the firearms involved. Other evidence from eyewitnesses, property owners, and surveillance footage in the area is also collected.

131. The time required for the Seattle Police Department to complete these steps increases significantly when a converted Glock is involved, with each casing needing to be individually investigated. The prevalence of converted Glocks at crime scenes in Seattle has

⁸¹ Shader, *supra* note 70, at 4.

⁸² Amanda Garrett, *Akron police trying to get machine guns—and tiny device that makes them—off streets*, Akron Beacon J. (July 25, 2024), <https://www.beaconjournal.com/story/news/crime/2024/07/25/glock-switches-make-machine-guns-status-symbols-for-akron-gangs/74471573007/>.

⁸³ Harris, *supra* note 71.

1 also increased the time that officers need to secure the scene, handle firearms to make weapons
2 safe, and ensure the safety of bystanders and officers.

3 132. Glock's continued failure to address known problems with its semi-automatic
4 pistols perpetuates ongoing harm to public health and safety in Seattle. These effects are felt by
5 both law enforcement personnel and ordinary residents of the City.

6 133. As a result of increasing gun violence and an increase in the number of shots fired
7 at crime scenes in Seattle, Seattle Police Department has convened specialized taskforces and
8 units that focus on disrupting gun violence in heavily impacted neighborhoods.⁸⁴ These efforts
9 help SPD more rapidly investigate and apprehend those responsible for gun violence.

10 134. For shootings that would not have occurred but-for a converted Glock, the drain on
11 the City's resources is exceptionally costly: shooting scenes draw enormous resources from
12 police and other first responders, far more than other crimes or accidents.

13 135. Even for shootings that would have otherwise occurred, the additional resources
14 required for shootings committed with fully automatic pistols are significant. Converted-Glock-
15 involved shootings often involve more victims and more shots fired, in a shorter time. The
16 City's employees must address additional bystander harm and track down additional casings and
17 bullets.

18 136. The City also incurs follow-on costs and lost opportunity costs from the
19 proliferation of converted Glockes.

20 137. When converted-Glock-involved shootings injure or kill Seattle residents, the City
21 loses out on that resident's contributions to the community.

22 138. Shootings involving converted Glockes can be more difficult to investigate and
23 solve, lowering the crime clearance rate. In addition, a drive-by shooter can ride off before
24
25

26 ⁸⁴ Conner Board, *SPD chief announces new task force following 'unacceptable' recent shootings*, King 5 (June 16, 2023, at 6:55 PM), <https://www.king5.com/article/news/local/public-safety/seattle-police-community-violence-task-force/281-07018bb8-28a6-41a8-88fa-3a7f82dd3ba2>.

1 anyone sees their face.⁸⁵ A lower crime clearance rate deters fewer crimes, emboldens criminals,
2 and leads to more crime and violence.⁸⁶

3 139. Crimes involving converted Glocks that are successfully investigated also incur
4 arrest costs.

5 140. The enticement, including the anonymity and “fun” of converted Glocks can lead
6 people, especially young people, to commit shootings that they otherwise would not, and enter
7 the criminal justice system when they otherwise might not.

8 141. Finally, converted-Glock shootings increase residents’ perceived risk of certain
9 areas, leading to less economic activity in areas where converted-Glock shootings are more
10 frequent.

11 **4. Converted Glocks pose an unacceptable risk to public safety.**

12 142. Converting a Glock handgun from semi-automatic to fully automatic using a Glock
13 switch significantly limits the shooter’s ability to aim and control the gun.

14 143. Unlike a semi-automatic handgun, a fully automatic handgun has virtually no delay
15 between bullets to allow the shooter to control the recoil because successive shots are fired
16 almost instantaneously. Fully automatic handguns are therefore difficult to aim and control,
17 even for trained shooters. This increases the likelihood that shooters will spray many bullets
18 indiscriminately, hitting unintended victims and causing additional property damage.⁸⁷

19 144. Glock is aware of how difficult it can be to fire fully automatic versions of its
20 handguns in a controlled way. Glock manufactures a fully automatic handgun, the Glock 18,
21 which is available exclusively to law enforcement. Gaston Glock “enjoyed showing off” the
22 fully automatic Glock 18 to police officers and other potential customers.⁸⁸ During these

24 ⁸⁵ German Lopez, *Nearly Half of America’s Murderers Get Away With It*, N.Y. Times (July 6, 2025),
<https://www.nytimes.com/2025/07/06/us/murder-solve-rate-louisville.html>.

25 ⁸⁶ *Id.*

26 ⁸⁷ Jennifer Horton, ‘*It’s just spraying rounds everywhere*’: *Tiny, illegal machine gun device surfaces in Ala.*, 6
WBRC NEWS (May 19, 2022), <https://www.wbrc.com/2022/05/19/its-just-spraying-rounds-everywhere-tiny-illegal-machine-gun-device-surfaces-ala/>.

⁸⁸ Nick Oetken, *What’s inside a Glock 18 pistol?*, GunZone (Feb. 17, 2024), <https://thegunzone.com/whats-inside-a-glock-18-pistol/>.

1 demonstrations, “[m]any an embarrassed police officer inadvertently peppered the ceiling of the
2 company shooting range with rounds.”⁸⁹

3 145. A poster on GlockForum.net described a video of a person shooting a converted
4 Glock by saying, “He musta shot every cloud in sight, the guy is wrestling the gun, to hold it
5 down.”⁹⁰

6 146. Following recent shootings in Western Washington, ATF Supervisory Special
7 Agent Catherine Cole stated that the rapid fire of converted Glockes makes the guns more
8 difficult to control and puts innocent lives in danger. “In some of these locations, you arrive and
9 there are bullet strikes to totally unintended targets. The backstop becomes these homes in these
10 [sic] neighborhood, vehicles that are uninvolved in the situation, innocent bystanders walking
11 down the street.”⁹¹

12 147. As the Maryland Attorney General noted, “ATF agents call it ‘spray and pray’
13 because once the trigger is pulled, there’s no control—only carnage.”⁹²

14 148. The deadly nature of converted Glockes is best exemplified by their use in mass
15 shootings.

16 149. In November 2019, four people were killed and six others were injured at a
17 backyard party in Fresno, California. One of the gunmen used a converted Glock.⁹³

18 150. In April 2022, six people were killed and twelve others were injured in a shooting
19 in downtown Sacramento, California. Officers estimated that at least 100 shots were fired. At
20 least one of the guns used was a converted Glock.⁹⁴

21 ⁸⁹ Barrett, *supra* note 6, at 60.

22 ⁹⁰ MisterMills357, *Glock full auto*, GlockForum.Net (Aug. 20, 2015), [https://www.glockforum.net/threads/glock-
full-auto.10958/?post_id=134774&nested_view=1&sortby=oldest#post-134774](https://www.glockforum.net/threads/glock-full-auto.10958/?post_id=134774&nested_view=1&sortby=oldest#post-134774).

23 ⁹¹ Harris, *supra* note 71.

24 ⁹² Lea Skene, *Baltimore sues Glock over handguns that can easily be converted to automatic weapons*, Seattle
Times (Feb. 12, 2025, at 11:45 AM), [https://www.seattletimes.com/business/baltimore-sues-glock-over-handguns-
that-can-easily-be-converted-to-automatic-weapons/](https://www.seattletimes.com/business/baltimore-sues-glock-over-handguns-that-can-easily-be-converted-to-automatic-weapons/).

25 ⁹³ Stephens & Hamilton, *supra* note 40; *Another suspect in November mass shooting now booked in Fresno Co.*
Jail, ABC 30 (Feb. 2, 2020), <https://abc30.com/fresno-shooting-in-peach-and-olive-california/5801939/>.

26 ⁹⁴ Libor Jany *et al.*, *Sacramento massacre shows rising dangers of handguns converted into automatic weapons*,
L.A. Times (Apr. 7, 2022, at 5:00 AM), [https://www.latimes.com/california/story/2022-04-07/la-me-sacramento-
shooting-automatic-weapons](https://www.latimes.com/california/story/2022-04-07/la-me-sacramento-shooting-automatic-weapons); Guy D. McCordle, *Glock Switches: The Tiny Devices Turning Pistols into Machine*

1 151. In May 2022, a 22-year-old fired a converted Glock with an extended magazine
2 into a crowd outside of a McDonald's in Chicago, just blocks from the Magnificent Mile
3 commercial district.⁹⁵ The shooter killed two people and wounded seven others.⁹⁶

4 152. On December 31, 2022, a man fired a converted Glock into a crowd of people
5 celebrating New Year's Eve in Mobile, Alabama. He killed one person and severely wounded
6 eight others.⁹⁷

7 153. In April 2023, a gunman fired into a Sweet 16 birthday party in Dadeville,
8 Alabama. He killed four people and wounded 32 others, most of them teenagers.⁹⁸ At least one
9 of the guns involved in the shooting was equipped with a Glock switch.⁹⁹

10 154. In May 2023, a 14-year-old boy from Las Vegas was shot five times by stray
11 gunfire from a converted Glock, and a 12-year-old girl was shot in the leg.¹⁰⁰

12 155. In August 2023, a gun battle erupted during a parade in Boston. Eight people were
13 injured—seven of them bystanders. Two of the people arrested, including one of the suspected
14 shooters, were carrying converted Glockes.¹⁰¹

15 156. In March 2024, three gunmen jumped out of a car and opened fire on a crowd at a
16 bus stop in Philadelphia. Eight people, all high school students, were injured. At least one gun
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18 _____
19 *Guns*, SOFREP (Apr. 15, 2025), <https://sofrep.com/gear/glock-switches-the-tiny-devices-turning-pistols-into-machine-guns/>.

20 ⁹⁵ Main, *supra* note 46.

21 ⁹⁶ *Two men charged in mass shooting that left 2 dead, 7 wounded on Near North Side*, CBS NEWS Chi. (May 22,
22 2022, at 11:43 AM), <https://www.cbsnews.com/chicago/news/jaylun-sanders-kameron-abram-charged-mass-shooting-near-north-side-chicago-avenue-state-street/>.

23 ⁹⁷ Press Release, *Possessing and Firing an Illegal Machinegun During New Year's Eve Celebrations*, U.S. Att'y's
24 Off. S.D. Ala. (Sept. 18, 2023), <https://www.justice.gov/usao-sdal/pr/mobile-man-sentenced-ten-years-prison-possessing-and-firing-illegal-machinegun-during>.

25 ⁹⁸ Holly Yan *et al.*, *All 4 young victims killed at an Alabama Sweet 16 party are identified as investigators scramble to find the assailant*, CNN (Apr. 17, 2023, at 8:17 PM), <https://www.cnn.com/2023/04/17/us/dadeville-alabama-birthday-party-shooting-monday/index.html>.

26 ⁹⁹ Josh Gauntt, *ALEA: One or two handguns from Dadeville mass shooting altered with 'Glock switch'*, WBRC News (Apr. 25, 2023, at 11:05 PM), <https://www.wbrc.com/2023/04/26/alea-one-or-two-handguns-dadeville-mass-shooting-altered-with-glock-switch/>.

¹⁰⁰ Londoño & Thrush, *supra* note 49.

¹⁰¹ *Day of violence along stretch of Blue Hill Avenue includes gun battle that injured eight near Jouvart parade*, Dorchester Rep. (Aug. 26, 2023), <https://www.dotnews.com/2023/seven-shot-talbot-avenue-jourvert-parade-passes-nearby-police-say-two>.

1 used in the shooting was a converted Glock.¹⁰²

2 157. In May 2024, a converted Glock was used in a mass shooting at a block party in
3 Memphis, Tennessee that killed two people and injured seven others.¹⁰³

4 158. In September 2024, multiple gunmen opened fire outside of a lounge near the
5 University of Alabama's Birmingham campus. Though police believe it was intended to be a
6 "targeted attack" on one individual, four people were killed and 17 were injured. Over one
7 hundred shell casings were recovered at the scene. At least one converted Glock was used in the
8 shooting.¹⁰⁴

9 159. In November 2024, a man used a converted Glock to shoot into a crowd at
10 Tuskegee University in Alabama.¹⁰⁵ He killed one person and shot twelve others.¹⁰⁶

11 **C. Glock knows that its semi-automatic handguns can be easily converted into illegal**
12 **machine guns.**

13 160. Glock has known for decades that its semi-automatic handguns can be easily
14 converted to support fully automatic fire. This is illustrated by the very minor differences
15 between Glock's fully automatic and semi-automatic pistols, Gaston Glock's demonstration of
16 the prototype Glock switch as early as 1988, and the illegal use of Glock's intellectual property
17 on Glock switches.

20 ¹⁰² *Final suspect arrested in shooting near SEPTA bus that injured 8 students*, NBC10 Phila. (Mar. 21, 2024, at
21 5:29 PM), <https://www.nbcphiladelphia.com/news/local/teenage-suspect-arrested-in-shooting-near-septa-bus-that-injured-8-students/3807218/>.

22 ¹⁰³ Jackson Brown, *Shelby County D.A. Steve Mulroy, CJ Davis pushing for harsher punishment for use of Glock*
23 *switches*, ABC 24 Memphis (May 2, 2024, at 7:46 PM), <https://www.localmemphis.com/article/news/crime/glock-switches-memphis-more-jail-time-steve-mulroy-cj-davis-orange-mound/522-de7b90dc-5020-4779-933a-ffec0078dc49>.

24 ¹⁰⁴ Greg Lickenbrock, *Police say "Glock switch" used in Birmingham Mass Shooting*, Smoking Gun (Sept. 24,
2024), <https://smokinggun.org/police-say-glock-switch-used-in-birmingham-mass-shooting/>.

25 ¹⁰⁵ Jeff Martin, *Man jailed after Tuskegee University shooting says he fired his gun, but denies shooting at anyone*,
AP News (Nov. 12, 2024, at 12:29 PM), <https://apnews.com/article/tuskegee-university-homecoming-shooting-alabama-8e0c9ba0873f67bc7eef4f4ec39e6521>.

26 ¹⁰⁶ Jeff Martin, *A person is dead and 16 are hurt after a shooting at Tuskegee University; 1 arrest made*, AP News
(Nov. 10, 2024, at 3:56 PM), <https://apnews.com/article/tuskegee-university-alabama-shooting-homecoming-bbf142f051aef128d790574534a5e370>.

1 **1. The fully automatic Glock 18 has only minor changes from the semi-**
2 **automatic Glock 17.**

3 161. Glock’s fully automatic handguns, which are not authorized for sale to civilians,
4 are substantially similar to its semi-automatic handguns. Essentially, the Glock 18 is a variation
5 of the Glock 17 with a “selector switch” that allows the user to switch between semi-automatic
6 and fully automatic firing.¹⁰⁷

7 162. Glock’s invention and promotion of the Glock 18 confirm its early knowledge—
8 and acknowledgement to the world—that Glock’s base handgun is inherently able to support
9 both fully automatic and semi-automatic firing modes.

10 **2. Glock knew and demonstrated that its semi-automatic handguns could be**
11 **easily switched to fully automatic machine guns nearly 40 years ago.**

12 163. In September 1987, a Venezuelan mechanical engineer and gunsmith named Jorge
13 Leon invented a “fire selector system” for use on the Glock 17. The fire selector system
14 manufactured by Mr. Leon’s business used a design that resembles the Glock switches
15 commonly used today—it holds down the Glock’s trigger bar after the trigger is pulled and does
16 not allow it to rise until the trigger is released, allowing automatic fire.¹⁰⁸

17 164. Gaston Glock became aware of Mr. Leon’s invention through Glock’s Venezuelan
18 distributor and traveled to the country for a demonstration in the late 1980s.¹⁰⁹

19 165. Mr. Leon showed Mr. Glock his invention and allowed Mr. Glock to test fire a
20 Glock equipped with the device. After examining the fire selector system, Mr. Glock advised
21 Mr. Leon to stop development on the device and to “leave it as a curiosity.”

22 166. From this meeting 36 years ago, Gaston Glock knew first-hand that a non-Glock
23 employee—far from Glock’s European or Georgia operations—could create and fabricate a
24

25 ¹⁰⁷ Kyle Mizokami, *Why the Glock 18 might be the most deadly gun on planet Earth*, Nat’l Int. (May 26, 2018),
26 <https://nationalinterest.org/blog/buzz/why-the-glock-18-might-be-the-most-deadly-gun-planet-earth-25982>.

¹⁰⁸ KARE 11 News, *EXTENDED INTERVIEW: Inventor of the Glock switch*, YouTube (Feb. 7, 2024), <https://www.youtube.com/watch?v=vxL60e42z5s>.

¹⁰⁹ *Id.*

1 simple device that turned a Glock 17 into a machine gun.

2 167. Years later, Leon successfully applied to patent his design as the “Fire Selector
3 System for Glock (FSS-G).”¹¹⁰ His patent application described his invention in nearly the exact
4 terms that Glock used to describe the Glock 18.¹¹¹

5 168. In the early 2000s, converted Glockes began to appear in connection with crimes in
6 the United States. For example, a 2003 ATF investigation of a South American arms trafficker
7 recovered seven converted Glockes and an additional nine Glock switches from persons arrested
8 in the United States.¹¹²

9 **3. Glock knows that switches are being sold and branded with Glock’s**
10 **intellectual property.**

11 169. In 2019, the Department of Homeland Security (“DHS”) contacted Glock as a part
12 of an investigation into illegally imported Glock switches.¹¹³ DHS agents spoke with a Glock
13 employee, who admitted that Glock is aware that switches are available for purchase on the
14 internet, including on websites like eBay.¹¹⁴

15 170. As reported by *The Trace*, “Glock switches have become so popular that unwitting
16 customers have mailed them to the company’s headquarters for repairs.”¹¹⁵

17 171. Confusion about the source of Glock switches makes sense, because many Glock
18 switches are branded with Glock’s trademarked logo.¹¹⁶

20 ¹¹⁰ Compare U.S. Patent No. 5,705,763 (filed July 18, 1996), with *G18—Fully automatic 9mm firepower*, Glock,
21 Inc. (Dec. 2, 2024), <https://eu.glock.com/en/products/pistols/g18> <https://web.archive.org/web/20241202154657/https://eu.glock.com/en/products/pistols/g18> (describing “fire selector” “switch” to “full-automatic firing mode”).

22 ¹¹¹ Chris Hrapsky, *Glock switch creator would ‘rather invent any other thing’ in wake of unintended consequences*,
KARE 11 (Feb. 7, 2024, at 10:31 PM), <https://www.kare11.com/article/news/local/kare11-extras/dangers-of-the-controversial-glock-switch-as-told-by-its-inventor/89-9fd2745b-4616-4f8e-b993-3a7249d10f85>.

23 ¹¹² *Internet Arms Trafficking*, ATF, <https://www.atf.gov/our-history/internet-arms-trafficking> (last updated May 15, 2020).

24 ¹¹³ See Aff. Michael Thomas, *United States v. Keller*, No. 21-cr-871 (N.D. Ohio Nov. 18, 2021), ECF No. 1-1.

25 ¹¹⁴ Though the employee stated that Glock was working with eBay to remove ads for Glock switches with its logo,
the employee did not state that Glock was taking any steps to prevent the easy conversion of its semi-automatic
26 handguns to fully automatic, and, even today, Glock switches continue to be advertised across the internet and
social media platforms. See *id.*

¹¹⁵ Chip Brownlee, *ATF Director Urges Action on Auto Sears ‘Flooding Our Communities’*, Trace (Mar. 1, 2023),
<https://www.thetrace.org/2023/03/atf-auto-sears-dettelbach-machine-gun/>.

¹¹⁶ *Freitas*, *supra* note 29, ECF No. 42, Ex. 1.



Figure 8. Glock switches branded with the Glock logo. Source: *Freitas*, *supra* note 29, ECF No. 42, Ex. 1.

172. Despite the proliferation of Glock switches bearing Glock’s logo, Glock has failed to stop companies from using Glock trademarks on their illegal products. Consumers may believe that Glock switches are legal and safe because they bear the Glock logo.¹¹⁷

173. According to allegations in the State of Minnesota’s case against Glock, on August 22, 2022, Glock’s general counsel forwarded an email from Glock’s outside intellectual property counsel to an ATF employee. The email detailed Glock’s intent to send cease-and-desist letters to entities selling Glock switches on Instagram and YouTube.¹¹⁸ The email shows Glock’s knowledge of the infringement of its intellectual property and the sales of illegal Glock switches.

174. Despite Glock’s knowledge of this intellectual property right infringement, Glock switches branded with Glock’s logo remain readily available.

D. Glock’s marketing and social media have contributed to the popularity of Glock switches.

175. Glock not only knows that its semi-automatic pistols can be easily converted to fully automatic machine guns, it has actively contributed to the problem by encouraging Glock owners to install aftermarket accessories to their guns, glorifying automatic weapons as “fun,” and allowing users to post about Glock switches on Glock’s official social media.

¹¹⁷ *Id.*

¹¹⁸ Compl. ¶ 127, *Minnesota v. Glock Inc.* (“*State of Minn.*”), No. 27-CV-24-18827 (Minn. 4th Dist. Ct. Dec. 12, 2024).

1 titled “Glock Switch” that includes the lyrics, “I bounce out, perfect time and hit that [expletive]
2 with a Glock switch.”¹²⁵

3 181. Glock switches and converted Glocks also appear in video games like Roblox,
4 which is particularly popular with young users.¹²⁶ In 2023, Roblox averaged 68.4 million daily
5 active users, 42% of whom were under 13 years old.¹²⁷



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16 **Figure 9.** Screenshot from YouTube video. Source: Lack, *supra* note 126.

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18 **2. Glock promotes the ease with which its guns can be accessorized.**

19 182. Glock highlights the simplicity of its handgun in its marketing materials and on its
20 website, which advertise that its handguns are “manufactured with only 34 component parts,
21 significantly less than our competitors’ semi-automatic pistol designs.”¹²⁸

22
23 ¹²⁵ Grey Gang Records, *GreyLandTee ft AbkLunatic - GLOCK SWITCH (Official Music Video)*, YouTube (Sept. 3,
24 2024), https://www.youtube.com/watch?v=01U6X7_aoVg.

25 ¹²⁶ Lack, *I Upgraded My GLOCK SWITCH In My New Roblox Hood Game*, YouTube (Dec. 5, 2023), <https://www.youtube.com/watch?v=SbNCihco14c>; Gio OG Clips, *Glock Switch Beam Review*, YouTube (May 10, 2022), <https://www.youtube.com/watch?v=zSTC40kUwRY>.

26 ¹²⁷ Roblox Corp., Annual Report (Form 10-K) at 9 (Feb. 21, 2024), <https://www.sec.gov/ix?doc=/Archives/edgar/data/0001315098/000131509824000026/rblx-20231231.htm>.

¹²⁸ *Glock Technology*, Glock, Inc., <https://us.glock.com/en/learn/glock-pistols/technology> (last visited Aug 29, 2025).

1 183. Glock’s self-described “simple” and “easy” handgun makes it easy to access
2 internal parts and attach accessories, facilitating the installation of devices like the Glock
3 switch.¹²⁹

4 184. Glock encourages its customers to customize their firearms. With Glock’s
5 knowledge and approval, Glock users equip their handguns with a range of aftermarket
6 accessories and parts, including the handgun slide and slide cover plate.¹³⁰

7 185. For years, Glock has encouraged companies to develop accessories and aftermarket
8 parts for its handguns. Companies such as “RockYourGlock”¹³¹ and “GlockStore”¹³² use
9 Glock’s trademarked name to encourage customers to modify their Glock handguns.
10 GlockStore, an online gun retailer, calls itself “The World’s #1 Source For Glock Parts &
11 Accessories.”¹³³ GlockStore promotes custom finishes and parts, including customized slide
12 cover plates.

13 186. The trend of equipping Glock handguns with accessories and aftermarket parts has
14 become so popular that accessorized Glock handguns are now colloquially known as “Gucci
15 Glocks,” which are found all over social media. For example, there is an Instagram account
16 called “Gucci_Glocks” that includes the tagline: “The premier page for #glockporn. Follow to
17 see the most badass Glocks on IG daily.”¹³⁴

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¹²⁹ *Id.*

24 ¹³⁰ Resp. Opp’n Mot. Summ. J., Ex. 3, Guevara Dep. 66:3-9 and 185:4-9, *Oglesbee v. Glock, Inc.*, No. 18-cv-560
(N.D. Okla. May 22, 2023), ECF No. 283-3.

25 ¹³¹ *Glock Slides*, RockYourGlock, <https://rockyourglock.com/custom-glock-shop/> (last visited Aug. 29, 2025).

26 ¹³² *Customize*, GlockStore, <https://www.glockstore.com/customize> (last visited Aug. 29, 2025).

¹³³ *About Us*: GlockStore, <https://www.glockstore.com/about-us> (last visited Aug. 29, 2025).

¹³⁴ Gucci_Glocks (@gucci_glocks), Instagram, https://www.instagram.com/gucci_glocks/?hl=en (last visited Aug. 29, 2025).

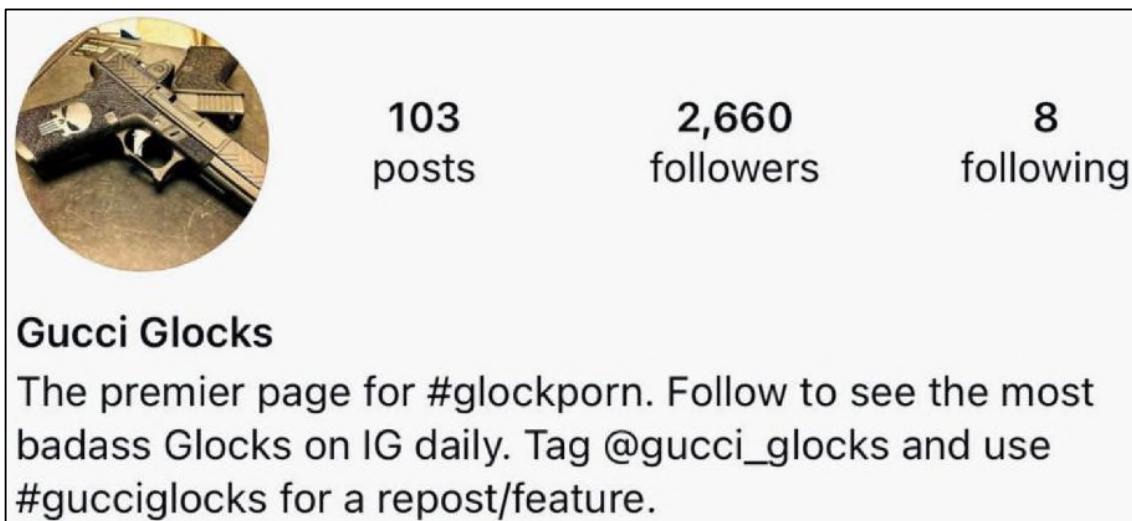


Figure 10. Source: Gucci_Locks (@gucci_locks), *supra* note 134.

187. Glock has run several social media campaigns encouraging customers to share their personalized Glock handguns. One Facebook post asked “all GLOCK enthusiasts” to “submit your own GLOCK photo using #MyGLOCK.”¹³⁵ Several users replied to this post with photographs of Glock handguns equipped with aftermarket parts.

188. While the post appears to have been removed, one user replied with a picture of a Glock handgun that they claimed had been converted to a fully automatic weapon and appears to be equipped with a Glock switch. The user claimed the handgun was a “full auto Glock 19.”¹³⁶

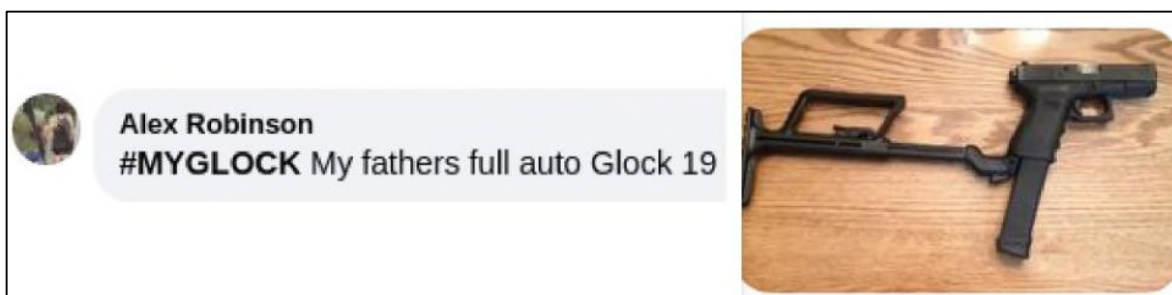


Figure 11. Source: *State of Minn.*, *supra* note 118, ¶ 76.

189. In another Facebook post, Glock asked its users “What do you like most about the

¹³⁵ GLOCK, *Give Us Your BEST SHOT*, Facebook (Mar. 25, 2016), <https://www.facebook.com/photo/?fbid=10154038811331797&set=a.158024376796>.

¹³⁶ *State of Minn.*, *supra* note 118, ¶ 76.

design of your GLOCK?”¹³⁷ Several users replied that their favorite feature was the rate of fire for the fully automatic Glock 18, and the ease with which other Glock pistols can be converted to fully automatic machine guns. One user commented: “I love glock 18c rate of fire and just everything.” Another user wrote “you can make with the cool accesories [sic] full auto the GLOCK pistol 😊.”¹³⁸

3. Glock promotes fully automatic weapons as “fun.”

190. On Glock’s Instagram account, Glock featured a video of a shooter firing a Glock 18, proclaiming “the only thing more fun than a GLOCK is full-auto GLOCK.”¹³⁹ The post does not indicate that owning or firing the Glock 18 is generally unlawful for civilian consumers in the United States because it is a fully automatic machine gun.



Figure 12. Source: Glock, Inc. (@glockinc), *supra* note 139.

191. Several comments following this post indicate the users’ desire to have a fully automatic Glock of their own. One post read, “I would kill for a Glock 18.” Another states, “I

¹³⁷ GLOCK, *What do you like most about the design of your GLOCK?*, Facebook (Aug. 5, 2015), <https://www.facebook.com/photo/?fbid=10153523110921797&set=a.158024376796>.

¹³⁸ *State of Minn.*, *supra* note 118, ¶¶ 79, 80.

¹³⁹ Glock, Inc. (@glockinc), Instagram (Sept. 8, 2018), <https://www.instagram.com/p/BneJfLsH3cO/>.

need this.”¹⁴⁰

192. In a 2023 social media post celebrating the New Year, Glock posted a video of someone firing both semi-automatic and fully automatic Glock handguns. As the video counts down from ten, the shooter fires the corresponding number of bullets from a semi-automatic Glock handgun. As the countdown reaches one, the shooter fires a fully automatic Glock handgun. The post does not identify the firearm shot in the video as a Glock 18 unavailable to the civilian public.¹⁴¹ This was posted the day after a man fired a fully automatic converted Glock into a crowd of people celebrating New Year’s Eve in Mobile, Alabama, killing one person and severely wounding eight others.¹⁴²

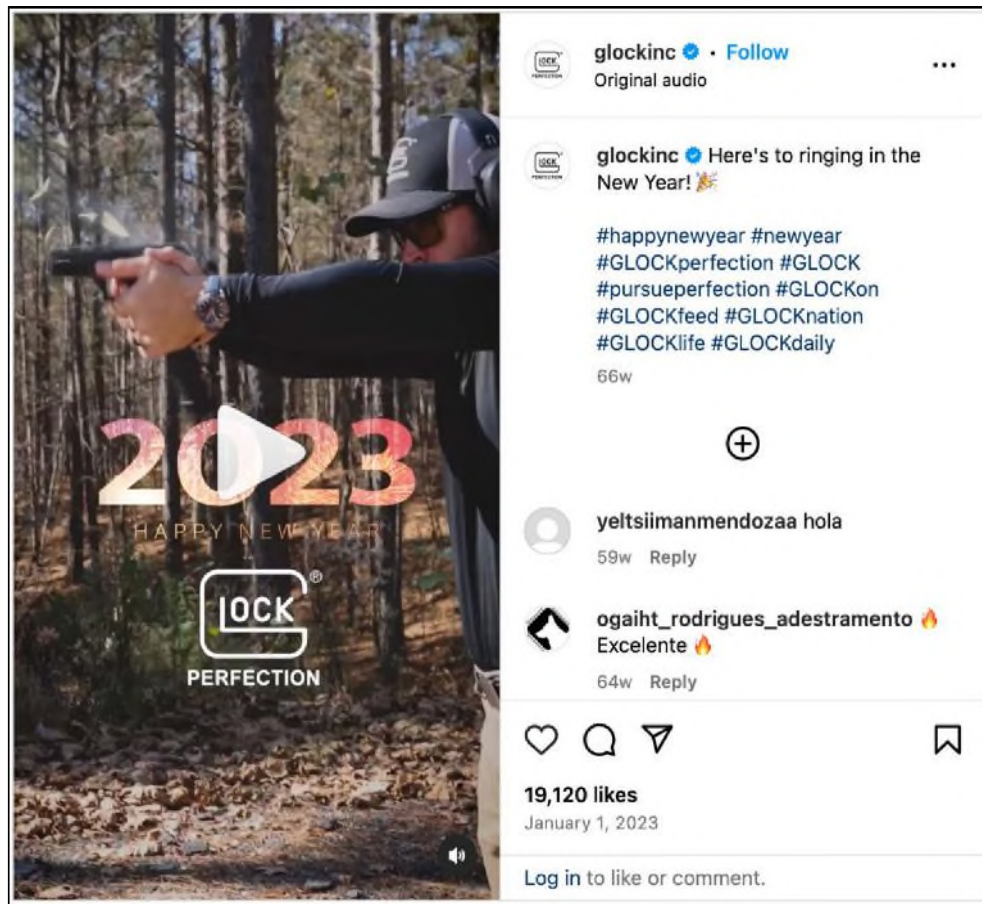


Figure 13. Source: Glock, Inc. (@glockinc), *supra* note 141.

¹⁴⁰ *Id.*

¹⁴¹ Glock, Inc. (@glockinc), Instagram (Jan. 1, 2023), <https://www.instagram.com/p/Cm357uAhVox>.

¹⁴² U.S. Att’y’s Off. S.D. Ala., *supra* note 97.

193. In other posts on social media, Glock has displayed images of the Glock 18 and the Glock 18C with language glorifying fully automatic Glock handguns: “Double your pleasure. Double your fun. #GLOCK #2A #GlockPerfection #G18 #fullauto” and “The G18C in all its glory . . . #GlockPorn.”¹⁴³

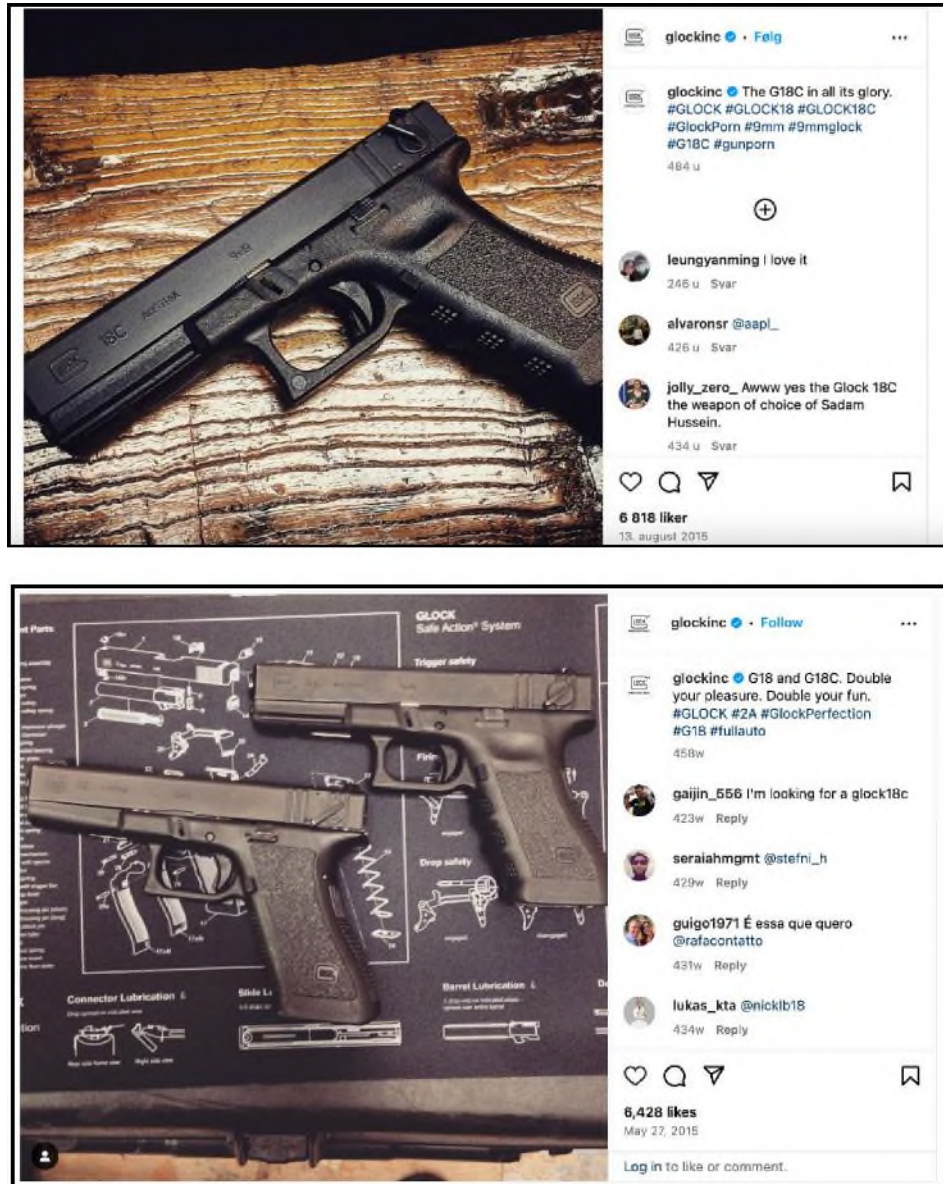


Figure 14. Source: Glock, Inc. (@glockinc), *supra* note 143.

¹⁴³ Glock, Inc. (@glockinc), Instagram (Aug. 13, 2015), <https://www.instagram.com/p/6U2pcXD8qC/>; *see also* Glock, Inc. (@glockinc), Instagram (May 27, 2015), <https://www.instagram.com/p/3MlcJxj8rk/>.

1 194. Glock continues to show the Glock 18 to visitors at the company's United States
2 headquarters in Smyrna, Georgia as "a Glock marketing practice."¹⁴⁴ One video shows the
3 Glock USA Rangemaster shooting the Glock 18C and showing off its features to visitors.
4 Pointing to the selector that turns the gun to fully automatic, the rangemaster says, "Here's the,
5 what we call the 'fun switch,' that's one of the names for it." The rangemaster later fires the
6 Glock 18C one-handed, and visitors are given the chance to fire the Glock 18C themselves.¹⁴⁵

7 **4. Glock previously allowed posts promoting the Glock switch on its official**
8 **social media.**

9 195. Glock's official Facebook page, which Glock invites consumers to "Follow," has
10 provided access to videos and comments glamorizing the use of converted Glocks.

11 196. As of May 27, 2025, Glock's official Facebook page has 1.8 million "likes" and 2
12 million "followers."

13 197. Glock previously configured the settings of its official Facebook page to display
14 Glock's own postings as well as any third-party postings that tag Glock.¹⁴⁶

15 198. While it has since been removed, until at least October 28, 2024, Glock's Facebook
16 page included a March 2021 posting where an individual had written, with emojis mixed in: "I
17 want a switch so bad and a 100 round clip."¹⁴⁷ That post had many "likes" and "shares," and
18 was followed by 38 responses, many of which expressed enthusiasm for Glock switches and
19 converted Glocks.¹⁴⁸

20 199. That same posting then showed a July 2017 video that depicted an individual
21 rapidly firing a converted Glock. The video caption, written in Spanish, stated, "[d]isparando
22 una Glock 17 en modo FULL AUTO con balas explosivas....simplemente impresionante!"¹⁴⁹

23
24 ¹⁴⁴ Barrett, *supra* note 6, at 60.

25 ¹⁴⁵ TFB TV, *The Full Auto Glock 18C Machine Pistol*, YouTube (Aug 17, 2017), <https://www.youtube.com/watch?v=cc4ZTIsusTQ>.

26 ¹⁴⁶ Compl. ¶ 118, *New Jersey v. Glock Inc.*, No. ESX-C-000286-24 (N.J. Super. Ct. Dec. 12, 2024).

¹⁴⁷ *Id.* ¶ 119.

¹⁴⁸ *Id.*

¹⁴⁹ *Id.* ¶ 120.

1 This translates to: “[s]hooting a Glock 17 in FULL AUTO mode with explosive bullets simply
2 impressive!”¹⁵⁰ This posting could be viewed on Glock’s official Facebook page until at least
3 October 28, 2024.¹⁵¹

4 200. Until at least October 28, 2024, Glock did not “untag” itself from these posts,
5 report the posts as featuring illegal weapons, add a disclaimer, or remove the posts and
6 comments from its Facebook page.¹⁵²

7 201. Until at least October 28, 2024, Glock’s Facebook page featured additional videos
8 highlighting converted Glocks. A simple search of the word “auto” on Glock’s Facebook
9 previously produced various videos depicting converted Glocks, including a video from as early
10 as 2015.¹⁵³ That video, which was previously accessible through Glock’s Facebook page,
11 featured a man declaring that he has a “Glock 19; auto sear. . . twelve hundred rounds a
12 minute.”¹⁵⁴ He then shot hundreds of rounds in less than a minute using large capacity
13 magazines. The caption to the video read “Must Watch!—Check Out this guy burning through
14 some ammo with a full-auto Glock.”¹⁵⁵ This video had 12,000 views.¹⁵⁶

15 **E. The Authorized Dealers contribute to the nuisance in Seattle.**

16 202. The Authorized Dealers distribute Glock’s easily converted weapons into the
17 Seattle area gun trade.

18 203. Bull’s Eye Indoor Range, Pantel Tactical, and Rainier Arms are part of Glock’s
19 network of authorized dealers in the Seattle area, indicated with markers on the below map:
20
21
22
23

24 ¹⁵⁰ *Id.*

25 ¹⁵¹ *Id.*

26 ¹⁵² *Id.* ¶ 121.

¹⁵³ *Id.* ¶ 122.

¹⁵⁴ *Id.*

¹⁵⁵ *Id.*

¹⁵⁶ *Id.*

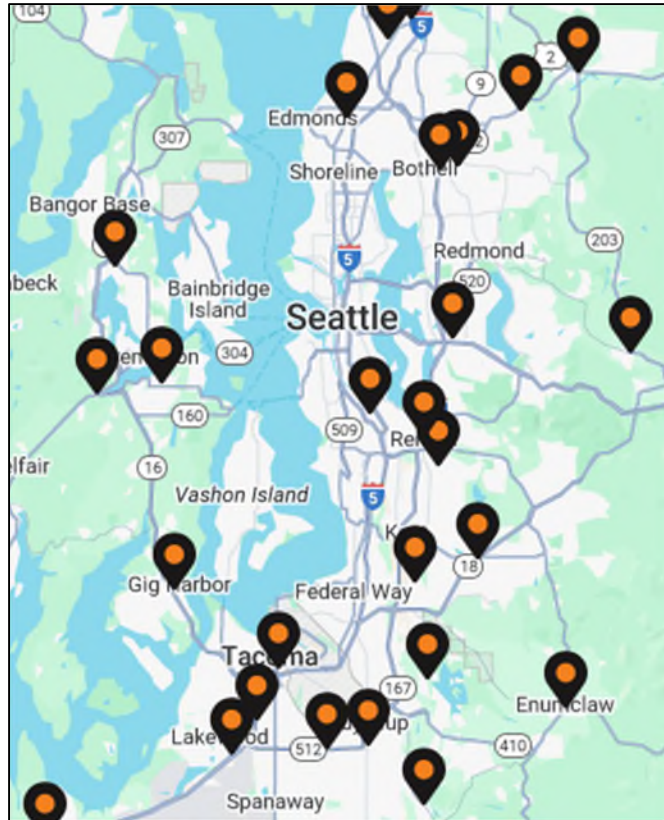


Figure 15. Greater Seattle-area Glock authorized dealers.
Source: *Dealer Locator*, *supra* note 12.

204. As of August 29, 2025, Pantel Tactical lists 44 Glock handguns for sale on its website.¹⁵⁷

205. Pantel Tactical’s website also sells dozens of other Glock parts and after-market accessories specifically designed for Glock handguns, including slide cover plates, alternative barrels, and trigger modifications.¹⁵⁸

206. As of August 29, 2025, Rainier Arms, LLC lists 8 Glock handguns for sale on its website.¹⁵⁹

¹⁵⁷ Search Products, Pantel Tactical.com, <https://panteltactical.com/shooting-sports/handguns/b337f993-0425-47c8-8059-a6045f4bf101/5a7b4207-00a2-41a6-a53d-80577628299d?manufacturers=202dfc65-1b08-43f8-8539-25c5cf0fab0a&inStockOnly=true> (last visited Aug. 29, 2025).

¹⁵⁸ See search results for “glock,” Search Products, Pantel Tactical.com, <https://panteltactical.com/search?categories=a3df0cfa-4b6c-4800-9f93-3f72d4698028&inStockOnly=true&searchText=glock&page=2> (last visited Aug. 29, 2025).

¹⁵⁹ See search results for “glock”, RainierArms.com, <https://www.rainierarms.com/catalogsearch/result/?q=GLOCK> (last visited Aug. 29, 2025).

1 207. Rainier Arms, LLC’s website also sells hundreds of other Glock parts and after-
2 market accessories specifically designed for Glock handguns, including slide cover plates,
3 alternative barrels, and trigger modifications, and compensators—devices that “mitigate the
4 gases coming out of your barrel so your gun shoots flatter, allowing for quicker and easier
5 follow up shots.”¹⁶⁰

6 208. Rainier Arms, LLC’s website also includes a “Step-by-Step Guide to Glock
7 Upgrades” that details the myriad of aftermarket devices for Glock handguns that can be used
8 “to make them more fun to shoot, to enhance their functionality for different applications, or to
9 create a unique look for the firearm.”¹⁶¹ This step-by-step guide is just one in a series of blog
10 posts on Rainier Arms, LLC’s website discussing ways to upgrade Glock handguns. Other
11 topics include: the “Best Glock Trigger”; “Top Aftermarket Glock Barrels”; “Selecting Glock
12 Sights”; and “How to Build a Glock Handgun at Home”—a post that describes how to “build
13 your own Glock by purchasing each part separately.”¹⁶²

14 209. Each Authorized Dealer has promoted Glock pistols on popular social media
15 platforms.

16 210. Bull’s Eye Indoor Range LLC has a Facebook page with approximately 5,000
17 followers.¹⁶³ Bull’s Eye’s Facebook page includes a number of posts mentioning or advertising
18 Glock pistols, and Glock pistol rentals.¹⁶⁴

21 ¹⁶⁰ See search results for “glock”, *Browse by Manufacturer*, RainierArms.com, <https://www.rainierarms.com/catalogsearch/result/index/?p=3&q=Glock+> (last visited Aug. 29, 2025).

22 ¹⁶¹ *Step-by-Step Guide to Glock Upgrades*, RainierArms.com, <https://www.rainierarms.com/blog/glock-upgrades-guide.html> (last visited Aug. 29, 2025).

23 ¹⁶² *Id.*

24 ¹⁶³ Bull’s Eye Indoor Range LLC, Facebook, <https://www.facebook.com/bullseyeindoorange> (last visited Aug. 30, 2025).

25 ¹⁶⁴ Bull’s Eye Indoor Range LLC, *Just in, all black G43x and G48’s*, Facebook, (Jul. 25, 2019) <https://www.facebook.com/bullseyeindoorange/photos/pb.100063631657388.-2207520000/2533531566677646/?type=3>; Bull’s
26 Eye Indoor Range LLC, *G44’s are now in stock*, Facebook (Jan. 21, 2020) <https://www.facebook.com/bullseyeindoorange/photos/pb.100063631657388.-2207520000/2910436908987108/?type=3>; Bull’s Eye Indoor Range LLC, *Glock rentals are in*, Facebook (Dec. 6, 2019) <https://www.facebook.com/bullseyeindoorange/photos/pb.100063631657388.-2207520000/2807007069330093/?type=3>.

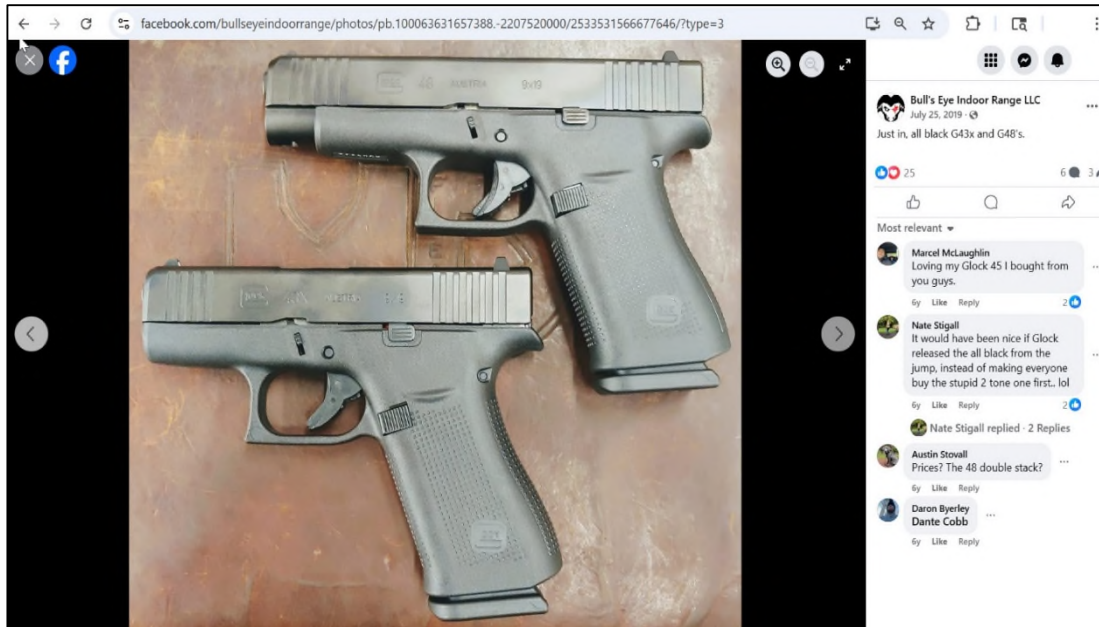


Figure 16. Source: Bull's Eye Indoor Range LLC, *supra* note 164.

211. Pantel Tactical has a Facebook page with approximately 4,900 followers.¹⁶⁵ Pantel Tactical's Facebook page includes dozens of posts mentioning or advertising Glock pistols, including posts that highlight the company's participation in Glock's Blue Label Dealer program.¹⁶⁶

¹⁶⁵ Pantel Tactical, Home, Facebook, <https://www.facebook.com/PantelTactical/> (last visited Aug. 29, 2025).

¹⁶⁶ Pantel Tactical, *Did you miss our Glock Blue Label program announcement?*, Facebook (Feb. 8, 2016), <https://www.facebook.com/share/16ogjqWbSU/>.



Figure 17. Source: Pantel Tactical, *supra* note 166.

212. Pantel Tactical has an Instagram page with 2,553 followers.¹⁶⁷ Numerous posts on Pantel Tactical's Instagram page advertises Glock pistols, including a post celebrating "Glocktober"—a popular marketing campaign among Glock dealers to enhance sales during October.¹⁶⁸

¹⁶⁷ Pantel Tactical (@panteltactical), Instagram, <https://www.instagram.com/panteltactical/> (last visited Aug. 29, 2025).

¹⁶⁸ Pantel Tactical (@panteltactical), #GLOCKTOBER has begun, Instagram (Oct. 1, 2019), <https://www.instagram.com/panteltactical/>.

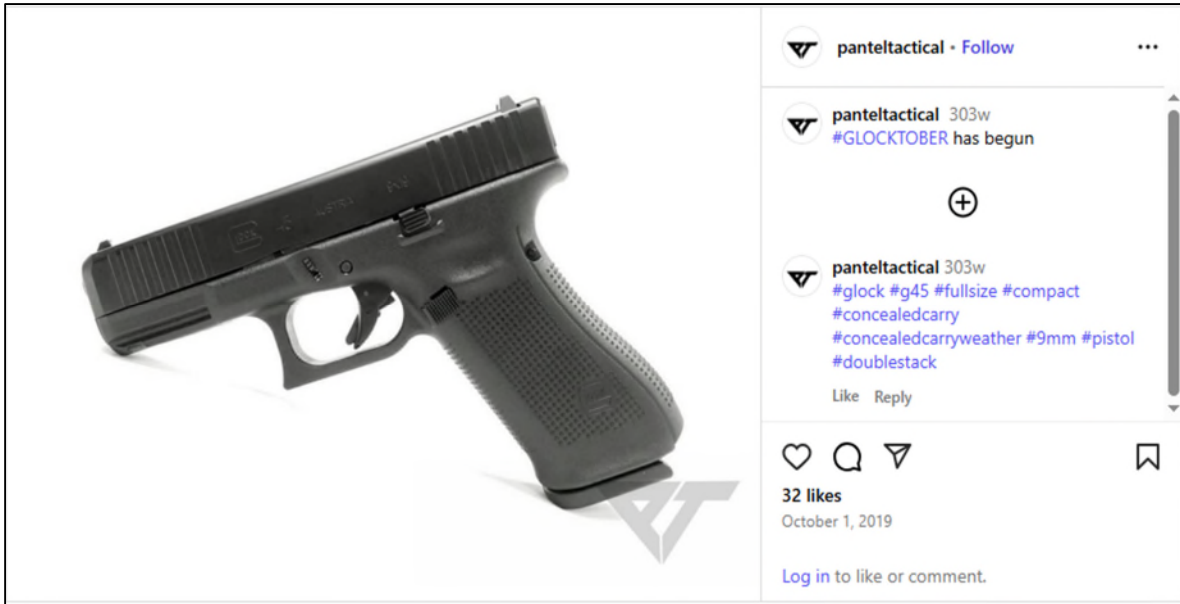


Figure 18. Source: Pantel Tactical (@panteltactical), *supra* note 168.

213. Rainier Arms, LLC has a YouTube channel with approximately 26,400 subscribers.¹⁶⁹ Eight videos hosted on this channel focus on Glock pistols, other products made by Glock, or aftermarket products for Glock pistols.

214. Rainier Arms, LLC has a Facebook page with approximately 627,000 followers.¹⁷⁰ Dozens of posts on Rainier Arms, LLC’s Facebook page advertise Glock pistols, other products made by Glock, or aftermarket products for Glock pistols.

215. Pantel Tactical and Rainier Arms, LLC have also glorified automatic weapons on their social media pages or websites.

216. Pantel Tactical’s Instagram page includes a post celebrating “#MachineGunMonday” as well as a post showing a test fire of a fully automatic submachine gun.¹⁷¹ One individual commented on the latter post saying, “The sound of freedom!!!!”¹⁷²

[com/p/B3GDrxgw_3/?igsh=NG11YXZjMG1ubmMy](https://www.instagram.com/p/B3GDrxgw_3/?igsh=NG11YXZjMG1ubmMy).

¹⁶⁹ Rainier Arms Media (@Rainierarms), *Home*, YouTube, <https://www.youtube.com/@Rainierarms/featured> (last visited Aug. 29, 2025).

¹⁷⁰ Rainier Arms, *Home*, Facebook, <https://www.facebook.com/Rainierarms> (last visited Aug. 29, 2025).

¹⁷¹ Pantel Tactical (@panteltactical), *Its #MACHINEGUNMONDAY !*, Instagram, <https://www.instagram.com/p/COTouf3rlBh/?igsh=MXQ1N2N3am8xMjJvaw%3D%3D> (last visited Aug 29, 2025).

¹⁷² Andrew Flynn (@andrewflynn87), Instagram, Comment to *Full Auto Sterling SMG postie (sic) test fire*, Pantel Tactical (Nov. 28, 2017), <https://www.instagram.com/p/BcD6cB8HYCv/?igsh=MWc3dWlvMXgycDVmZg%3D%3D>.

217. According to Rainier Arms, LLC's website, the company offers customers the opportunity to shoot "a great selection of Full-Auto firearms," and encourages individuals to "indulge yourself with the ability to shoot non-stop with the selector switch on 'Auto.'"¹⁷³ The webpage advertises fully automatic weapons as "a great tool which will turn gunpower into smiles."¹⁷⁴

218. Rainier Arms, LLC's Facebook page includes multiple posts with the hashtag "#FullAutoFriday." These posts feature videos of individuals firing fully automatic weapons.¹⁷⁵

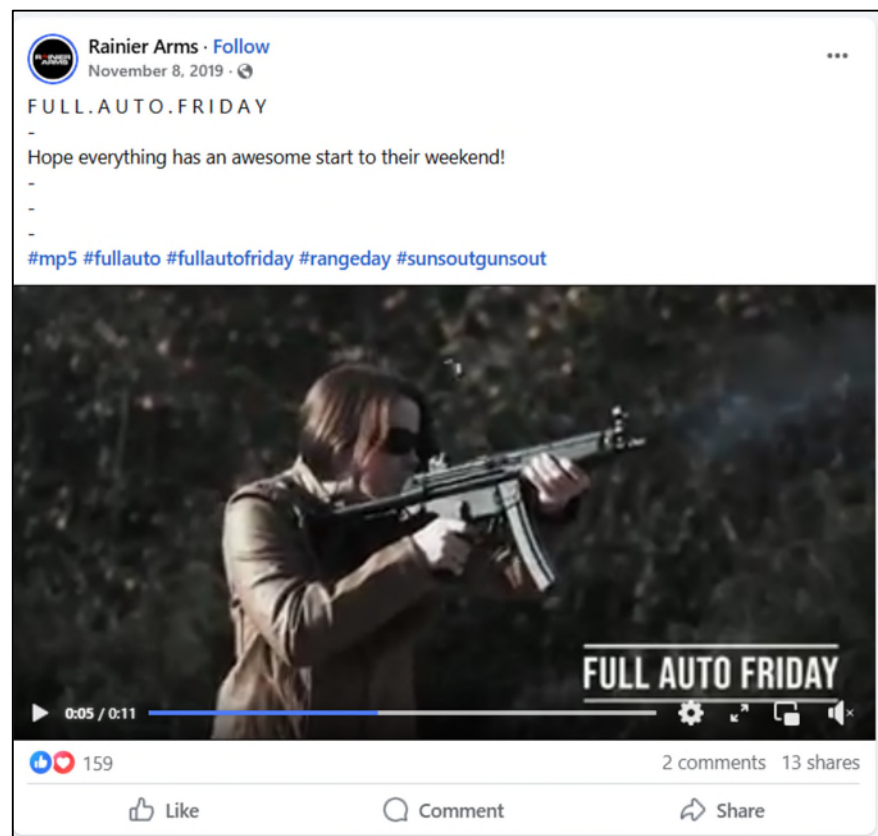


Figure 19. Source: Rainier Arms, *supra* note 175.

219. Upon information and belief, each Authorized Dealer knows that semi-automatic Glock handguns can be easily converted into illegal machine guns using Glock switches.

¹⁷³ *Full Auto*, Rainier Arms, <https://www.rainierarmsfa.com/about-our-range/full-auto/> (last visited Aug. 29, 2025).

¹⁷⁴ *Id.*

¹⁷⁵ Rainier Arms, *Full Auto Friday*, Facebook (Nov. 8, 2019), <https://www.facebook.com/profile/100064347206298/search/?q=F%20U%20L%20L%20.%20A%20U%20T%20O%20.%20F%20R%20I%20D%20A%20Y>.

220. Upon information and belief, Glock pistols marketed and sold by each Authorized Dealer have been converted into illegal, fully automatic weapons. The Authorized Dealers named in this Complaint have each sold, at one time, at least one Glock that was later converted, or attempted to be converted, to an automatic weapon and recovered by the Seattle Police Department.

221. These converted Glockes are used to harm Seattle residents and are draining the resources of local law enforcement.

222. In September 2023, the Seattle Police Department recovered a converted Glock from a burglary suspect. Upon information and belief, the gun was sold by Rainier Arms, LLC.

223. In May 2024, the Seattle Police Department recovered a converted Glock that was used in a shooting incident in West Seattle.¹⁷⁶ Upon information and belief, the gun was sold by Pantel Tactical.

224. In December 2024, the Seattle Police Department recovered a converted Glock while conducting a search warrant for investigation of first-degree assault. Upon information and belief, the gun had been sold by Bull's Eye.

V. CAUSES OF ACTION

**COUNT ONE — VIOLATION OF RCW 7.48
(PUBLIC NUISANCE)
(Against the Glock Defendants)**

225. The City realleges and incorporates the preceding paragraphs as if fully set forth herein.

226. The Firearm Industry Responsibility and Gun Violence Victims' Access to Justice Act ("FIRA") applies to Glock, Inc. and Glock Ges.m.b.H.

227. Under RCW 7.48.330(1)(a), Glock is a “firearm industry member” because it is “a person engaged in the wholesale or retail sale, manufacturing, distribution, importing, or marketing of a firearm industry product.”

¹⁷⁶ *WEST SEATTLE CRIME WATCH: Gunfire investigation at 20th/Barton*, W. Seattle Blog (May 1, 2024, at 6:12 PM), <https://westseattleblog.com/2024/05/west-seattle-crime-watch-gunfire-investigation-at-20th-barton/>.

1 228. Glock is also a “person” within the meaning of RCW 7.48.330(1)(d), because it is
2 a “firm, corporation, company, partnership, society, joint stock company.”

3 229. Glock’s pistols are “products” within the meaning of RCW 7.48.330(1)(e)(i)
4 because they are firearms.

5 230. Glock’s pistols are “firearm industry products” within the meaning of RCW
6 7.48.330(1)(b)(i)–(iii) because they are distributed and marketed in Washington, are intended to
7 be sold, distributed, and marketed in Washington, and are used and possessed in Washington, as
8 is reasonably foreseeable.

9 231. Glock violates FIRA subsection 3 and subsection 6(a).

10 232. Glock violates RCW 7.48.330(3), which provides that “a firearm industry member
11 shall not knowingly create, maintain, or contribute to a public nuisance in this state through the
12 sale, manufacturing, distribution, importing, or marketing of a firearm industry product.”

13 233. An actionable nuisance is “whatever is injurious to health . . . so as to essentially
14 interfere with the comfortable enjoyment of the life and property” under RCW 7.48.010.

15 234. Under RCW 7.48.120, a nuisance is “unlawfully doing an act [which] annoys,
16 injures or endangers the comfort, repose, health [and] safety of others . . . [and] render[ing]
17 dangerous for passage . . . any public park, square, street or highway, [and] renders other
18 persons insecure in life.”

19 235. Glock also violates RCW 7.48.330(6)(a). Under that subsection, a “firearm
20 industry member shall not manufacture, distribute, import, market, offer for wholesale, or offer
21 for retail sale a firearm industry product that is . . . [d]esigned, sold, or marketed in a manner
22 that foreseeably promotes conversion of legal firearm industry products into illegal firearm
23 industry products.” Under RCW 7.48.330(7), a Section 6(a) violation is a public nuisance.

24 236. Glock’s easily converted Glock pistols constitute a public nuisance.

25 237. Converted Glocks are difficult for a shooter to control. People in the vicinity of a
26 converted-Glock shooting—or police, who are more likely to encounter violent scenes—are at

1 great risk of harm. Converted Glockes interfere with officers' and bystanders' enjoyment of life,
2 render public areas dangerous for passage, and render bystanders and especially officers
3 insecure in life.

4 238. Converted Glockes fire many bullets in a short window of time. The resulting spray
5 takes longer for police to investigate, which interferes with and depletes police resources and
6 poses a direct threat to officers coming upon dangerous scenes.

7 239. Converted Glockes are illegal to possess; however, because a switch can be installed
8 or removed in only a few minutes, it is easy to convert an illegal converted Glock back into a
9 legal semi-automatic weapon and vice versa. This ease of conversion makes converted Glockes
10 difficult to track and interferes with police efforts to deter and mitigate the possession of illegal
11 weapons.

12 240. Under RCW 7.48.130, this nuisance affects equally the rights of the entire Seattle
13 community, although the extent of the damage may be unequal. All members of the Seattle
14 community are at risk of physical harm associated with catching a stray bullet from a converted
15 Glock and are harmed by diverted resources and additional expenditures attributable to
16 converted Glockes. But some community members, and in particular, police officers, are more
17 likely to experience such gun violence. Moreover, the City experiences particular harm in the
18 form of diverted resources and additional expenditures attributable to converted Glockes,
19 including the additional resources the City has to spend securing and investigating crime scenes
20 where Glock switches were used.

21 241. Glock has maintained and contributed to this nuisance.

22 242. Glock creates, maintains, and contributes to the proliferation of easily converted
23 Glockes in circulation in Seattle. It creates these weapons in a way that makes them easy to
24 convert. It manufactures and imports these weapons into the United States, and Western
25 Washington in particular, where they are offered for sale at authorized resellers.

26 243. Glock offers its pistols for sale to Seattle residents who can use Glock's website to

1 facilitate their purchases; they do so by entering their addresses—or similarly “Seattle” on
2 Glock’s website to be directed to nearby federally licensed Glock-authorized gun stores just
3 outside the city limits where they can purchase their pistols. In addition, Glock pistols can be
4 purchased indirectly by Seattle residents via the “Buy Now” link on Glock’s website and then
5 picked up at a brick-and-mortar location in Washington. The “Buy Now” link directs to a third-
6 party website, which allows customers to place the pistol in an online cart and complete the
7 purchase transaction, including payments. The pistol is then shipped to a federally licensed
8 brick-and-mortar store for the customer to complete the required steps, including a background
9 check, and pick up the pistol.

10 244. Glock targets marketing at the United States, and Western Washington in
11 particular, that glorifies fully automatic Glocks and obscures the illegality of those weapons,
12 thereby promoting the illegal conversion of their weapons into illegal weapons.

13 245. Glock has known since at least the 1980s that its semi-automatic pistols could be
14 converted to illegal fully automatic weapons with just a screwdriver and a device the size of
15 pocket change. It has known since the 2010s that Glock switches are easily ordered from the
16 internet and 3D printed.

17 246. Glock also knows that Glock switches are illegal, and that Glock pistols with the
18 switches are illegal. Glock further knows that converted Glocks are dangerous and require
19 additional police resources.

20 247. Nonetheless, it has refused to take action to prevent the easy conversions, and it
21 has continued to glorify possession of fully automatic Glock pistols.

22 248. As a result of Glock’s actions, the City experiences reasonably foreseeable harm.

23 249. Under RCW 7.48.020, the City is injuriously affected by this public nuisance.

24 250. The City is forced to divert resources to respond to converted Glock shootings.

25 251. For shootings that would not have occurred but-for a converted Glock, the City’s
26 opportunity cost is significant: shooting scenes require enormous resources from police and

1 other first responders, far more than other crimes or accidents. The City has devoted more
2 resources to investigating and otherwise addressing gun violence. Even for shootings that would
3 have otherwise occurred, the additional resources required for shootings committed with fully
4 automatic pistols are significant. The City's employees must address additional bystander harm
5 and track down additional casings and bullets. Shootings involving converted Glocks can be
6 more difficult to investigate and solve. A lower crime clearance rate deters fewer crimes,
7 emboldens criminals and leads to more crime and violence. The crimes that are successfully
8 investigated incur arrest costs.

9 252. The City also incurs follow-on costs and lost opportunity costs. When converted-
10 Glock-involved shootings injure or kill Seattle residents, the City loses out on that person's
11 contributions. The enticement, including the anonymity and "fun" of converted Glocks can lead
12 people, especially young people, to commit shootings that they otherwise would not, and enter
13 the criminal justice system when they otherwise might not. Finally, converted-Glock shootings
14 increase residents' perceived risk of certain areas, leading to less economic activity in areas
15 where converted-Glock shootings are more frequent.

16 253. The City also incurs costs to address the increased proliferation of fully automatic
17 machine guns, a result of the easily converted Glocks.

18 254. Glock's misconduct has created an ongoing and persistent public nuisance.
19 According to Seattle Police data, crimes involving Glock switches are increasing.

20 255. The public nuisance does not constitute a discrete event or discrete emergency of
21 the sort a political subdivision would reasonably expect to occur—Glock switches are
22 encountered throughout the year and throughout the City.

23 256. Dealing with converted Glocks is not part of the normal and expected costs of
24 maintaining a local government—the guns are more easily converted into illegal weapons than
25 others, and Glock's marketing has contributed to the popularity and glorification of converted
26 Glocks.

1 257. The City’s harms are a reasonably foreseeable effect of Glock’s conduct.

2 258. It is foreseeable that a pistol that can be easily converted into a fully automatic
3 weapon will be so converted.

4 259. It is foreseeable that such converted weapons will be used and will be difficult for
5 users to control, resulting in rapid, indiscriminate fire, and demanding increased and diverted
6 police resources.

7 260. It is further foreseeable that marketing that glorifies fully automatic Glock
8 weapons, without disclosing their illegality for civilians, will contribute to the glorification of
9 illegally converted Glock pistols.

10 261. It is foreseeable that Glocks will be converted and used for crimes in Seattle, and
11 that the associated harm will be felt in Seattle and by the City specifically.

12 262. Under RCW 7.48.020, the City requests an order providing for abatement of the
13 public nuisance that Glock has created, maintained, and contributed to and enjoining further
14 violations.

15 **COUNT TWO — VIOLATION OF RCW 7.48**
16 **(PUBLIC NUISANCE)**
 (Against the Authorized Dealer Defendants)

17 263. The City realleges and incorporates the preceding paragraphs as if fully set forth
18 herein.

19 264. FIRA, RCW 7.48.330, applies to the Authorized Dealers.

20 265. Under RCW 7.48.330(1)(a), each Authorized Dealer is a “firearm industry
21 member” because it is “a person engaged in the wholesale or retail sale . . . distribution, and
22 marketing of a firearm industry product.”

23 266. Each Authorized Dealer is a “person” within the meaning of RCW 7.48.330(1)(d),
24 because it is a “firm, corporation, company, partnership, society, joint stock company.”

25 267. Each Authorized Dealer sells, distributes, and markets Glock pistols, which are
26 “products” within the meaning of RCW 7.48.330(1)(e)(i) because they are firearms.

1 268. Each Authorized Dealer sells, distributes, and markets Glock pistols that are
2 “firearm industry products” within the meaning of RCW 7.48.330(1)(b)(i)–(iii) because they are
3 distributed and marketed in Washington, are intended to be sold, distributed, and marketed in
4 Washington, and are used and possessed in Washington, as is reasonably foreseeable.

5 269. Each Authorized Dealer violates FIRA subsection 3 and subsection 6(a).

6 270. Each Authorized Dealer violates RCW 7.48.330(3). Under that subsection, “a
7 firearm industry member shall not knowingly create, maintain, or contribute to a public nuisance
8 in this state through the sale, manufacturing, distribution, importing, or marketing of a firearm
9 industry product.”

10 271. An actionable nuisance is “whatever is injurious to health . . . so as to essentially
11 interfere with the comfortable enjoyment of the life and property” under RCW 7.48.010.

12 272. Under RCW 7.48.120, a nuisance is “unlawfully doing an act [which] annoys,
13 injures or endangers the comfort, repose, health [and] safety of others . . . [and] render[ing]
14 dangerous for passage . . . any public park, square, street or highway, [and] renders other
15 persons insecure in life.”

16 273. Each Authorized Dealer also violates RCW 7.48.330(6)(a). Under that subsection,
17 a “firearm industry member shall not manufacture, distribute, import, market, offer for
18 wholesale, or offer for retail sale a firearm industry product that is . . . [d]esigned, sold, or
19 marketed in a manner that foreseeably promotes conversion of legal firearm industry products
20 into illegal firearm industry products.” Under RCW 7.48.330(7), a Section 6(a) violation is a
21 public nuisance.

22 274. Easily converted Glock pistols constitute a public nuisance.

23 275. Converted Glocks are difficult for a shooter to control. People minding their own
24 business in the vicinity of a converted-Glock shooting—or police, who are more likely to
25 encounter violent scenes—are at great risk. Converted Glocks interfere with officers and
26 bystanders’ enjoyment of life, render public areas dangerous for passage, and render bystanders

1 and especially officers insecure in life.

2 276. Converted Glockes fire many bullets in a short amount of time. The resulting spray
3 takes longer for police to investigate, which interferes with police resources and poses a direct
4 threat to officers coming upon dangerous scenes.

5 277. Converted Glockes are illegal to possess; however, because a switch can be installed
6 or removed in only a few minutes, it is easy to convert an illegal converted Glock back into a
7 legal semi-automatic weapon and vice versa. This ease of conversion makes converted Glockes
8 difficult to track and interferes with police efforts to deter and mitigate the possession of illegal
9 weapons.

10 278. Under RCW 7.48.130, this nuisance affects equally the rights of the entire Seattle
11 community, although the extent of the damage may be unequal. All members of the Seattle
12 community are at risk of catching a stray bullet from a converted Glock and are affected by the
13 decline in police resources. But some community members, and in particular, police officers, are
14 more likely to experience such gun violence. Moreover, the City experiences particular harm in
15 the form of diverted resources and additional expenditures attributable to converted Glockes,
16 including the additional resources the City has to spend securing and investigating crime scenes
17 where Glock switches were used.

18 279. Each Authorized Dealer has contributed to this nuisance.

19 280. As an “authorized” Glock seller in the Seattle metropolitan area, each Authorized
20 Dealer creates, maintains, and contributes to the proliferation of easily converted Glockes in
21 Seattle’s circulation.

22 281. Bull’s Eye Indoor Range serves consumers in the Seattle area who purchase
23 firearms, including Glock pistols, either directly at its storefront in Tacoma, or via Glock’s
24 website through the “Buy Now” link, and then picked up at Bull’s Eye. Bull’s Eye Indoor
25 Range also offers used guns and consignment.

26 282. Pantel Tactical serves consumers in the Seattle area who purchase firearms,

1 including Glock pistols, either directly at its storefront in Renton, via Glock's website through
2 the "Buy Now" link and then picked up at Pantel Tactical, or via Pantel Tactical's website and
3 shipped to the store for pickup.

4 283. Rainier Arms, LLC serves consumers in the Seattle area who purchase firearms,
5 including Glock pistols, either directly at its storefront in Auburn or via Rainier Arms, LLC's
6 website which are shipped to the store for pickup or to other licensed firearm dealers within the
7 Seattle city limits.

8 284. The Seattle Police Department has recovered converted Glocks used in crimes that
9 were sold by the Authorized Dealers.

10 285. Upon information and belief, each Authorized Dealer, as an authorized Glock
11 reseller and a gun seller familiar with state gun laws, knows that the Glock semi-automatic
12 pistols that it sells can be converted to illegal fully automatic weapons. Each knows that Glock
13 switches are readily accessible.

14 286. Each Authorized Dealer also knows that Glock switches are illegal, and Glock
15 pistols with the switches are illegal. Each Authorized Dealer further knows that converted
16 Glocks are dangerous and require additional police resources.

17 287. Nonetheless, each Authorized Dealer has continued to market and sell Glocks in
18 the Seattle metropolitan area.

19 288. As a result of the Authorized Dealers' actions, the City experiences reasonably
20 foreseeable harm. Under RCW 7.48.020, the City is injuriously affected by this public nuisance.

21 289. For shootings that would not have occurred but-for a converted Glock, the City's
22 opportunity cost is significant: shooting scenes require enormous resources from police and
23 other first responders, far more than other crimes or accidents. The City has devoted more
24 resources to investigating and otherwise addressing gun violence. Even for shootings that would
25 have otherwise occurred, the additional resources required for shootings committed with fully
26 automatic pistols are significant. The City's employees must address additional bystander harm

1 and track down additional casings and bullets. Shootings involving converted Glocks can be
2 more difficult to investigate and solve. A lower crime clearance rate deters fewer crimes,
3 emboldens criminals and leads to more crime and violence. The crimes that are successfully
4 investigated incur arrest costs.

5 290. The City also incurs follow-on costs and lost opportunity costs. When converted-
6 Glock-involved shootings injure or kill Seattle residents, the City loses out on that person's
7 contributions. The enticement, including the anonymity and "fun" of converted Glocks can lead
8 people, especially young people, to commit shootings that they otherwise would not, and enter
9 the criminal justice system when they otherwise might not. Finally, converted-Glock shootings
10 increase residents' perceived risk of certain areas, leading to less economic activity in areas
11 where converted-Glock shootings are more frequent.

12 291. The City also incurs costs to address the increased proliferation of fully automatic
13 machine guns, a result of the easily converted Glocks.

14 292. Each Authorized Dealer's misconduct has created an ongoing and persistent public
15 nuisance. According to Seattle Police data, crimes involving Glock switches are increasing.

16 293. The public nuisance does not constitute a discrete event or discrete emergency of
17 the sort a political subdivision would reasonably expect to occur—Glock switches are
18 increasingly encountered throughout the year and throughout the City.

19 294. Dealing with converted Glocks is not part of the normal and expected costs of
20 maintaining a local government—the guns are more easily converted into illegal weapons than
21 others, and marketing of the pistols has contributed to the popularity and glorification of
22 converted Glocks.

23 295. The City's harms are a reasonably foreseeable effect of the Authorized Dealers'
24 conduct.

25 296. It is foreseeable that a pistol that can be easily converted into a fully automatic
26 weapon will be so converted.

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