



THE STATE OF NEW JERSEY
OFFICE OF THE ATTORNEY GENERAL

March 26, 2024

VIA EMAIL AND OVERNIGHT MAIL

Mr. Carlos Guevara
General Counsel
Glock, Inc.
6000 Highlands Parkway SE
Smyrna, GA 30082
carlos.guevara@glock.us

Re: *City of Chicago v. Glock, Inc.*, No. 2024CH02216 (Cir. Ct. Cook County)

Dear Mr. Guevara:

We write to express our deep concern about the allegations raised against Glock, Inc. (“Glock”) in *City of Chicago v. Glock, Inc.*, No. 2024CH02216 (Cir. Ct. Cook County). We hereby notify you of Glock’s obligation under the laws of our respective States to preserve all documents related to those allegations for potential future production.

We have followed the mounting reports about devastation and public terror caused by Glock handguns that became illegal machine guns when fitted with cheap, ubiquitous inserts known as “switches” or “auto-sears.” In New Jersey, a Glock 9mm with a switch and 30-round magazine emptied 28 rounds at a Newark housing complex, wounding three. *United States v. Muhammad*, D.N.J. Crim. No. 23-16048. In Minnesota, 27 shots exploded at a gas station altercation, killing one and injuring another. *Illegal Gun Modification Devices Proliferate, Resulting in More Deadly Rounds in Minneapolis*, Minnesota Star Tribune, Oct. 13, 2021, <https://rb.gy/ilnmxt>. In Connecticut, an auto-sear helped attackers conduct an ambush, murdering two on a house front porch. *3 Dead, 1 Injured, 1 Arrested in 2 Separate Shootings in Hartford*, NBC Connecticut, Aug. 6, 2023, <https://rb.gy/irbf8t>. The list goes on.

These unfolding horror stories exemplify the extraordinary danger of automatic weapons on our streets, and demonstrate why they are so strictly prohibited. Worse yet, these are not isolated events or coincidences: machine-gun Gllocks and the switches to make them have been proliferating with increasing frequency. According to the federal Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), ATF seized more than 5,400 machine-gun conversion parts into custody from 2017 to 2021—a 570% increase from the prior five-year period. *National Firearms Commerce and Trafficking Assessment (NFCTA): Crime Guns—Volume Two*, ATF

<https://rb.gy/euv3yw>. With Glock's uniquely receptive modular design, using those parts to make a functional machine gun could not be simpler. It can take only seconds, literally.

What this means for law enforcement and the public is terrifying. Monitoring by ShotSpotter, Inc. alone detected approximately 5,600 incidents of automatic weapon fire in 2021—a 1,400% increase from 2019. *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, <https://rb.gy/8bhp14>. As ATF Director Steven Dettelbach put it: “Police officers are facing down fully automatic weapon fire in amounts that haven’t existed in this country since the days of Al Capone and the Tommy gun. It’s a huge problem.” *Surge of Illegal Homemade Machine Guns Has Helped Fuel Gun Violence in The U.S.*, ABC News, Mar. 9, 2024, <https://rb.gy/axikk8>.

In light of these grievous public safety issues, we were disturbed to read the City of Chicago's recently filed allegations that you have known for *decades* that easy adaption into a machine gun is a natural feature of your handgun design, and that it would have been easy and obvious for you to make different design choices to avoid this problem. Despite this, you have introduced, in your latest “Gen5” model versions what are allegedly only minimal and functionally immaterial design changes, and you have continued to market and sell your legacy designs. All the while, you have increased production and sales overall, distributing an enormous quantity of handguns that you allegedly knew could readily be made to function as concealed machine guns. The story that the complaint tells is of a company manufacturing and selling deadly weapons that were unreasonably dangerous in their design—in reckless disregard for public safety—choosing profits over responsible design choices.

The City of Chicago's lawsuit claims that your choices constitute violations of multiple sections of the Municipal Code of Chicago, including through the unreasonable sale and marketing of firearms and unfair business practices; the creation of, maintenance of, and contribution to an ongoing public nuisance; and negligence. If the City's factual allegations are true, your conduct may also involve violations of our States' laws. We will not hesitate to enforce our laws when they are violated.

In light of the foregoing, we hereby request that you preserve for future production all documents in your custody or control, from January 1, 1987 to the present, related to:

1. The conversion of Glock semiautomatic handguns into automatic weapons, through the use of “switches” or similar modifications, including but not limited to documents related to the prevalence, use in crime or violence, or public safety impact of such converted Glock semiautomatic handguns;
2. The design and development of Glock pistols with respect to their semiautomatic function, including but not limited to documents relating to their receptiveness to being made to function automatically, whether you took or considered action to reduce that receptiveness, or the possibility of design changes or alternatives;
3. Your knowledge about all state and federal laws relating to Glock switches and converted Glock machine guns, your legal responsibility as a manufacturer of guns that

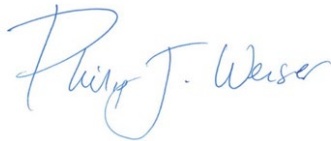
can be converted using Glock switches, and whether or not you complied with such laws and upheld such responsibility;

4. Financial information relating to Glock pistols, including profit, manufacturing costs, and distribution costs, as well as the costs of developing and/or implementing any alternative design choices that were available or considered; and
5. Any public-facing marketing or advertising related to Glock pistols, including any representations about their supposed safety, lethality, modularity, semiautomatic function or the speed at which they fire.

Sincerely,



MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY



PHILIP J. WEISER
ATTORNEY GENERAL OF COLORADO



WILLIAM TONG
ATTORNEY GENERAL OF CONNECTICUT



KATHLEEN JENNINGS
ATTORNEY GENERAL OF DELAWARE



BRIAN L. SCHWALB
ATTORNEY GENERAL OF DISTRICT OF COLUMBIA



ANDREA JOY CAMPBELL
ATTORNEY GENERAL OF MASSACHUSETTS



DANA NESSEL
ATTORNEY GENERAL OF MICHIGAN



KEITH ELLISON
ATTORNEY GENERAL OF MINNESOTA



ELLEN F. ROSENBLUM
ATTORNEY GENERAL OF OREGON



MICHELLE A. HENRY
ATTORNEY GENERAL OF PENNSYLVANIA



PETER NERONHA
ATTORNEY GENERAL OF RHODE ISLAND



CHARITY R. CLARK
ATTORNEY GENERAL OF VERMONT



BOB FERGUSON
ATTORNEY GENERAL OF WASHINGTON