



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

STATE OF DELAWARE, ex rel.
KATHLEEN JENNINGS, Attorney
General of the State of Delaware,

Plaintiff,

v.

GLOCK, INC.; and GLOCK
GES.M.B.H., an Austrian company,

Defendants.

C.A. No. _____

VERIFIED COMPLAINT

The State of Delaware, *ex rel.* Kathleen Jennings, Attorney General of the State of Delaware (“Delaware” or the “State”), brings this action against Defendants Glock, Inc. and Glock Ges.m.b.H. (together with Glock, Inc., “Defendants” or “Glock”).

INTRODUCTION

1. For many years, Delaware has aligned with the nation in restricting machine gun possession and usage.¹ Beyond this restriction, Delaware has clarified

¹ See, e.g., 11 Del. C. §§ 1444(b)(1), 4205(b)(5); Amanda Watford, *States move to outlaw popular ‘Glock switches’ that make some guns fully automatic*, STATELINE, (Apr. 23, 2025, 5:00 AM), <https://stateline.org/2025/04/23/states-move-to-outlaw-popular-glock-switches-that-make-some-guns-fully-automatic>.

that auto sears or “Glock switches,” devices designed to convert semi-automatic weapons into machine guns, are outlawed.²

2. A Glock switch—a small metal or plastic device the size of a Lego piece—allows a semi-automatic handgun to easily be converted into an illegal and fully automatic weapon that can fire continuously with a single trigger pull.³ These nickel-sized, switchable devices have become increasingly popular, wreaking havoc and destruction in communities.⁴ Glock switches can be purchased for under \$20⁵ and, in less than one minute, can be easily fitted onto the back of a Glock handgun, immediately allowing the gun to fire as an automatic machine gun.⁶ More than any other auto sear, Glock switches have gained popularity and are specifically designed by third-party sellers to be used with Glock handguns.⁷

² 11 Del. C. § 1444; S. Bill 8, *An Act to Amend Title 11 of the Delaware Code Relating to Destructive Weapons*, 151st Gen. Assemb., Reg. Sess. (Del. 2022) (enacted).

³ Anne Lurea, *22 Investigates: The Gamble of Glock Switches*, WSBT 22 (Sept. 25, 2025, 7:07 PM), <https://wsbt.com/news/local/22-investigates-the-gamble-of-glock-switches-machine-gun-devices-kill-danger-weapon-safety-threat-automatic-rise-in-cases-st-joseph-county-indiana>.

⁴ Lisa Fletcher, *US Senator pushes to get Glock switches off streets, cites Spotlight investigation*, FOX 17 (July 22, 2024, 11:13 AM), <https://fox17.com/news/spotlight-on-america/us-senator-chuck-grassley-pushes-to-get-glock-switches-off-streets-cites-spotlight-investigation>.

⁵ Watford, *supra* note 1.

⁶ Fletcher, *supra* note 4.

⁷ “Glock Switches” and Auto Sears, THE SMOKING GUN, <https://smokinggun.org/glock-switches-auto-sears> (last visited Oct. 20, 2026).

3. The Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) recovered over 5,400 machine gun conversion parts between 2017 and 2021, which was a 570% increase from the previous five-year period.⁸ ATF recovered 3,769 machine gun conversion parts in 2024 alone.⁹

4. Glock has long known that its handguns can be quickly and cheaply converted into illegal machine guns with the use of these Glock switches. Federal authorities, including the ATF, have repeatedly warned Glock about the dangers of its semi-automatic handgun design and the ease of modification, yet the company for years refused to make even basic design changes that would prevent these conversions.

5. Instead, Glock has continued to profit from selling its easily convertible handguns.¹⁰ Glock’s historical marketing has only fueled the problem, glorifying the firepower of its fully automatic models—such as the Glock 18, which is illegal for civilians—while effectively turning a blind eye to the predictable and widespread

⁸ *National Firearms Commerce and Trafficking assessment (NFCTA): Crime Guns – Volume Two, Part VII: Recommendations and Future Enhancements*, ATF at 1, 4 (Jan. 11, 2023), <https://www.atf.gov/firearms/docs/report/nfcta-volume-ii-part-vii-recommendations/download>.

⁹ *U.S.-Firearm Types Recovered and Traced-2024*, ATF, <https://www.atf.gov/media/22766/download>.

¹⁰ Andrew Edelman, *New Everytown Report Names Glock as Top Manufacturer of Crime Guns*, THE SMOKING GUN (Sept. 30, 2024), <https://smokinggun.org/new-everytown-report-names-glock-as-top-manufacturer-of-crime-guns>.

use of Glock switches on its civilian models by continuing to pump U.S. communities with these easily convertible handguns.

6. The result is a flood of Glocks equipped with Glock switches (“Switched Glock Machine Guns”) on American streets—illegal weapons capable of firing up to 1,200 rounds per minute.¹¹ These weapons are notoriously difficult to control, increasing the risk of catching bystanders in a bullet spray, and multiplying the devastation caused by gunfire.¹²

7. Glock knows its handguns are uniquely vulnerable to this conversion.¹³ It has the capability to redesign its handguns so they cannot be easily switched into illegal machine guns, yet for years it willfully chose not to act. Upon information and belief, this inaction was born out of a reluctance to incur costs.¹⁴ In doing so, it has put profits ahead of public safety and violated the law.

¹¹ THE SMOKING GUN, *supra* note 7.

¹² Sally Pitts, *Federal law enforcement making new efforts to crack down on Glock switches*, WSFA 12 (July 18, 2024, 6:39 PM), <https://www.wsfa.com/2024/07/18/federal-law-enforcement-making-new-efforts-crack-down-glock-switches>.

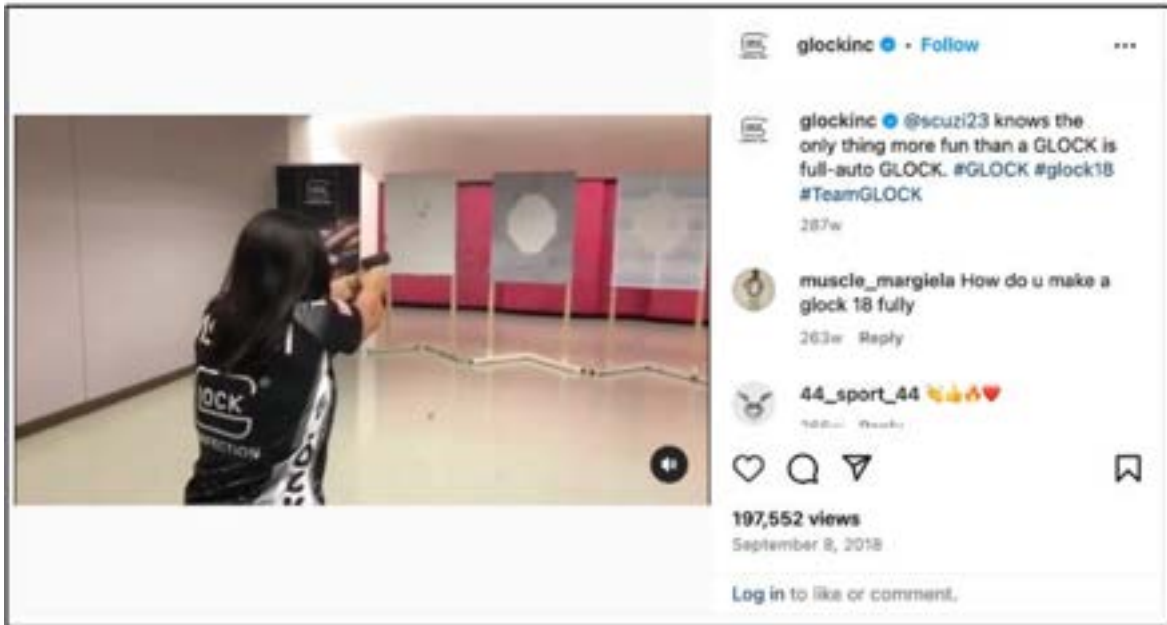
¹³ *City of Chicago v. Glock, Inc.*, No. 2024CH06875, Complaint, at ¶¶ 41-44 (Cook Cnty. Cir. Ct., Ch. Div. Nov. 20, 2024) (detailing the ease with which Glocks can be converted via Glock switches and the prevalence of the practice).

¹⁴ Champe Barton, *Glock Could Make It Harder to Outfit Its Pistols With Switches — For a Price*, THE TRACE (Sept. 4, 2024), <https://www.thetrace.org/2024/09/glock-switch-lawsuits-pistol-design>.

8. Glock markets its handguns to civilians as semi-automatic handguns, but their underlying design makes conversion to fully automatic fire alarmingly simple.

9. Glock has also encouraged this conversion by promoting the “fun” of Glock 18 fully automatic machine guns, which are illegal for civilians to purchase. Its official Facebook page has, for years, promoted content glorifying Switched Glock Machine Guns, with videos easily found by searching terms such as “switch” or “auto.”





10. Glock is fully aware that its semi-automatic handguns are being converted into illegal Switched Glock Machine Guns¹⁵ and is aware of how seamlessly Glock switches work with its products. While Glock itself does not produce these deadly items, many Glock switches still bear Glock's logo. The popular association of the Glock brand with machine gun functionality runs so deep that many third-party auto sears are even sold with a copied Glock logo printed on them.

¹⁵ Letter from Glock, Inc. to Daniel Elliot, Oklahoma Representative, *GLOCK, Inc.'s Support for Machinegun Conversion Device Legislation* (Aug. 19, 2025), <https://apps.legislature.ky.gov/CommitteeDocuments/8/35641/3.%2026RS%20BR%208%20-%20AN%20ACT%20relating%20to%20machine%20gun%20conversion%20devices%20%28Glock%20Letter%20of%20Support%29.pdf>.



11. Due to Glock’s inaction, Glock handguns outfitted with Glock switches are inflicting deadly harm in Delaware and across the nation. Once switched, these weapons function like true machine guns—spraying bullets so uncontrollably that shooters “spray and pray,” putting bystanders at extreme risk.¹⁶

12. The threat continues to escalate. Law enforcement agencies nationwide are reporting record numbers of Switched Glock Machine Guns. Instead of taking meaningful steps to curb these conversions, Glock has fueled the problem.

13. Glock switches have led to harm nationwide, their danger amplified by the increased killing capacity they offer.

- a. In September 2024, a shooting outside a Birmingham, Alabama, nightclub unleashed 100 rounds, killing four people and injuring seventeen others.¹⁷
- b. On May 26, 2025, a Memorial Day celebration in a Philadelphia park descended into tragedy when gunfire erupted, leaving two people dead

¹⁶ Pitts, *supra* note 12.

¹⁷ Eric Levenson, *Police believe the Birmingham, Alabama, mass shooters used ‘conversion devices.’ Here’s what that means*, CNN (Sept. 24, 2024, 11:50 AM), <https://www.cnn.com/2024/09/24/us/conversion-device-glock-switch-birmingham-shooting>.

and nine others injured. At least one of the firearms utilized by the shooters was equipped with a switch.¹⁸

- c. In Chicago, in February 2023, police officers recovered three handguns equipped with switches in the bedroom of a 16-year-old who has since been sentenced for killing two other teenagers at a high school.¹⁹
- d. In Jackson, Mississippi, in January 2024, a civilian and a deputy were killed in a barrage of bullets from a shooter with a Glock switch.²⁰

14. The common denominator in all of these incidents is that each firearm had been fitted with a Glock switch, and soon after, devastation followed. These incidents represent only a drop in the bucket—just a few among the hundreds, if not thousands, of Glock switch-related shootings across the United States.

15. Delaware residents are not immune to this threat. They too now face the threat of fully automatic gunfire from Switched Glock Machine Guns.

¹⁸ Jon Haworth & Bill Hutchinson, *Fully automatic gun used in deadly Memorial Day mass shooting in Philadelphia park: Police*, ABC NEWS (May 27, 2025, 5:18 PM), <https://abcnews.go.com/US/memorial-day-mass-shooting-leaves-2-dead-9/story?id=122215994>.

¹⁹ *Expelled student charged with Juarez High School shooting that killed 2, injured 2 more*, CWBCHICAGO (Feb. 11, 2023, 2:18 PM), <https://cwbchicago.com/2023/02/expelled-student-charged-with-juarez-high-school-shooting-that-killed-2-injured-2-more.html>.

²⁰ Howard Ballou, *'Glock switch' modified gun used in George County deputy killing*, WLBT3 (Jan. 31, 2024, 10:14 PM), <https://www.wlbt.com/2024/02/01/glock-switch-modified-gun-used-george-county-deputy-killing/>.

16. In August 2024, a Middletown resident was found with a machine gun converted with a Glock switch ordered from China, and subsequently arrested and charged with illegally possessing a machine gun.²¹

17. In July 2025, during a narcotics search conducted by the Delaware State Police Department at the Camden residence of a 17-year-old, officers discovered a 3D-printed Glock switch along with two Glock-style ghost guns.²²

18. Similarly, during a 2019 law enforcement search of a Newark resident's home, officers found two Glock switches in his possession, along with a firearm.²³

19. On an otherwise ordinary Thursday afternoon in 2025, two 20-year-olds were found in possession of a Switched Glock Machine Gun that was also loaded with a high-capacity magazine during a routine traffic stop.²⁴

²¹ Press Release, *Middletown Man Charged with Illegally Possessing Machineguns*, U.S. ATT'Y'S OFF., DIST. OF DEL. (Aug. 5, 2024), <https://www.justice.gov/usao-de/pr/middletown-man-charged-illegally-possessing-machineguns>.

²² Joe Carmean, *17-year-old Arrested for 'Ghost Guns,'* 47ABC WMDT (July 17, 2025), <https://www.wmdt.com/2025/07/17-year-old-arrested-for-ghost-guns>.

²³ Press Release, *Newark Man In Possession Of Machine Guns Sentenced To 31 Months In Federal Prison*, U.S. ATT'Y'S OFF., DIST. OF DEL. (Feb. 24, 2021), <https://www.justice.gov/usao-de/pr/newark-man-possession-machine-guns-sentenced-31-months-federal-prison>.

²⁴ Zainuddin Harinder, *Loaded Glock With Auto Switch Seized in Route 9 Traffic Stop; Two 20-Year-Olds Charged*, MY CHESCO (July 24, 2025), <https://www.mychesco.com/a/news/social-issues/crime/loaded-glock-with-auto-switch-seized-in-route-9-traffic-stop-two-20-year-olds-charged>.

20. Three victims were injured in an April 14, 2022, shooting involving a Switched Glock Machine Gun that fired multiple rounds, fifteen of which struck the victims' unsuspecting vehicle.²⁵

21. These individual incidents involving Glock switches in Delaware reveal an alarming pattern—one of increasing prevalence, accessibility, and ease of use—contributing to growing harm within the State.

22. Moreover, these incidents of violence are also the result of Glock's refusal to take commonsense actions in preventing the conversion of its handguns into high-capacity machine guns. Though Glock may have taken some steps to alter future sales by halting the sale of some models, these actions are inadequate and there must be a full and total remedy to staunch the flow of violence at the hand of Glock switches in Delaware.

23. Glock's design, manufacture, and sale of semi-automatic handguns that are easily switched into illegal machine guns, coupled with Glock's refusal to fix this known hazard, violate Delaware law.

24. Glock's conduct described herein and its large-scale distribution of switchable handguns through Delaware gun dealers—and through dealers in neighboring states who serve the Delaware market—threaten and harm the State and

²⁵ Appellant's Opening Br., *Dillard v. State of Delaware*, No. 256-2024, at 8, 22 (Del. Sup. Ct., Nov. 22, 2024).

its residents. Glock's purposeful and irresponsible decision to put profits over safety fuels gun violence and causes many Delaware residents to justifiably fear using the public streets, parks, schools, and transportation otherwise available to them.

25. Through this lawsuit, the Attorney General seeks an order enjoining Glock from continuing to market and distribute easily switched handguns to civilian consumers in Delaware, and an award of compensatory and punitive damages. The Attorney General also seeks abatement, at Glock's expense, of the nuisance it has knowingly and foreseeably caused, and continues to cause, as well as restitution for endangering and harming Delawareans and the State through its unreasonable, unlawful, and dangerous conduct. The Attorney General does not seek any relief with respect to the sales or marketing of Glock pistols, as currently designed, to law enforcement; this lawsuit is focused exclusively on Glock's conduct with respect to the civilian market in Delaware.

PARTIES

26. Plaintiff is the State of Delaware, by and through Kathleen Jennings, the Attorney General of the State of Delaware. The Attorney General is the chief law officer of the State, 29 *Del. C.* § 2504, and is expressly authorized to commence this action, and to seek the relief requested herein, by the Keshall "KeKe" Anderson Safe Firearm Sales Act, 10 *Del. C.* § 3930 ("Section 3930"), which provides at subsection (f):

(f) Whenever it appears to the Attorney General that a firearm industry member has engaged in or is engaging in conduct in violation of this section, the Attorney General may commence an action to seek and obtain any of the following:

- (1) An injunction prohibiting the firearm industry member from continuing the conduct or engaging in the conduct or doing any acts in furtherance of the conduct.
- (2) An order providing for abatement of the nuisance at the expense of the firearm industry member.
- (3) Restitution.
- (4) Compensatory and punitive damages.
- (5) Reasonable attorneys' fees, filing fees, and reasonable costs of the action.
- (6) Any other appropriate relief.

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

28. Defendant Glock, Inc. is a firearm importer, manufacturer, and dealer located in Smyrna, Georgia. It is incorporated under the laws of the State of Georgia as a domestic for-profit corporation with its principal place of business at 6000 Highlands Parkway SE, Smyrna, Georgia 30082. Glock handgun sales in the United States earn the company hundreds of millions of dollars in annual revenue. Glock, Inc. is directly and materially involved in the assembly, design, marketing, advertising, and distribution of Glock handguns for civilians, including those

residing in Delaware. Glock, Inc. distributes its products in Delaware primarily, if not exclusively, through a network of authorized dealers located in or near Delaware.

29. Defendant Glock Ges.m.b.H. (“Glock Limited”) is an Austrian limited liability company, with its principal place of business in Deutsch-Wagram, Austria. Glock Limited designs, manufactures, assembles, markets, advertises, distributes, and sells Glock handguns. Glock, Inc. then imports those handguns and component parts into the United States. Glock, Inc. uses Glock Limited’s component parts to assemble handguns that are distributed throughout the United States, including to civilian residents of Delaware. According to court filings, Glock, Inc. is the only company in the United States with which Glock Limited directly does business. Operating through Glock, Inc. and the Glock, Inc. dealer network, Glock Limited knowingly places its handgun products into the stream of commerce, with the intention that those products reach Delaware civilian residents. Glock Limited and INC Holding GmbH, an Austrian holding company, jointly own Glock, Inc.

30. Glock Limited is the center for the company’s multifaceted operations. In addition to producing Glock handguns at its production facility, Glock Limited operates a global administrative division encompassing sales, logistics, exports, marketing, and training.

31. Glock Limited and its founder, Gaston Glock, created Glock, Inc. to sell its products in the United States, including in Delaware, from which Glock Limited generates substantial revenue.

32. Since the creation of Glock, Inc., executives and other employees of Glock Limited, including Gaston Glock, have personally participated in, and directed the activities of, Glock, Inc.

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

34. Glock Limited controls and directs the activities of Glock, Inc. so that it can access the United States market, including the Delaware market.

35. For customers, Glock Limited draws no meaningful distinction between Glock Limited and Glock, Inc., presenting its marketing, sales, and service information using simply the name “Glock.”

36. For many years, Glock Limited manufactured all Glock handguns that were sold in the United States. In 2013, Glock, Inc. began to manufacture handguns in the United States using component parts supplied by Glock Limited from Austria. As of 2022, public reporting indicates that Glock Limited still manufactures the majority of Glock handguns sold in the United States.

37. Glock Limited controls the design and production standards used in Glock, Inc.’s assembly facilities in the United States. According to Glock Limited’s website, Glock, Inc.’s American facility follows the same production standards and procedures as the facilities in Austria. Glock, Inc. and Glock Limited have conspired with one another, and continue to conspire, to have large numbers of Glock handguns that are readily susceptible to being switched into automatic weapons reach Delaware civilians and civilians in other states of the United States.

38. Glock distributes its handguns in Delaware primarily through firearm dealers, who make them available for sale to civilians in Delaware. Glock generally has relationships with dealers and distributes its guns through incentives like its “GLOCK Stocking Dealer Program.”²⁶ Stocking Dealers receive reduced pricing from Glock distributors, uniform advertising from Glock that can be used to market the products, and inclusion in the broader marketing program that Glock calls the “GLOCK marketing effort” (which includes a direct listing on Glock’s website and locator tool).²⁷ Glock encourages dealers to join its Stocking Dealer Program, which promotes consistent branding and acts as the primary distribution method for Glock’s products to reach civilians.

²⁶ *GLOCK Stocking Dealer Program*, GLOCK, <https://us.glock.com/en/owners-resources/dealers-professionals/programs> (last visited Oct. 20, 2026).

²⁷ *Id.*

39. Glock also distributes its handguns to civilians in Delaware through its “Blue Label Program.” Glock’s Blue Label Program is an exclusive program which allows eligible public safety, military personnel, and law enforcement customers to purchase a Glock product at a discounted rate.²⁸ The current program provides discount purchases of two Glock weapons per calendar year.²⁹

40. Through Glock’s website, Delaware residents can browse Glock’s dealer locator tool to identify dealers participating in the Blue Label Program and view the dealer’s contact information to purchase Glock handguns.³⁰ There is at least one Blue Label dealer in Delaware and several more in surrounding states.

41. Each Defendant is a “firearm industry member” within the meaning of 10 *Del. C.* § 3930(a)(1), and the Glock handguns and component parts described herein are “firearm-related product[s]” within the meaning of 10 *Del. C.* §§ 3930(a)(2) and (a)(4), because they were sold, made, distributed, or marketed in this State; were intended to be sold, made, distributed, or marketed in this State; and/or were possessed in this State under circumstances in which it was reasonably foreseeable that they would be possessed or used in this State.

²⁸ *GLOCK Blue Label Program*, GLOCK, <https://us.glock.com/en/products/blue-label-program> (last visited Oct. 20, 2026).

²⁹ *Id.*

³⁰ *GLOCK Dealer Locator*, GLOCK, <https://us.glock.com/en/dealer-locator-usa> (last visited Oct. 20, 2026).

JURISDICTION

42. This Court has subject matter jurisdiction over this civil action pursuant to Article IV, § 10 of the Delaware Constitution and 10 *Del. C.* § 341, and may award the relief authorized by 10 *Del. C.* § 3930(f).

43. This Court's exercise of personal jurisdiction is proper because the action arises from the Defendants' deliberate targeting of Delaware residents as customers and deliberate partnering with Delaware businesses, including Delaware gun stores, as well as Defendants' regular, repeated, and systematic contacts with Delaware. Defendants have also engaged, including in concert with one another, in intentional acts directed to Delaware, and therefore could reasonably anticipate being hauled into court in Delaware. *See* 10 *Del. C.* § 3104(c).

44. Defendants have deliberately solicited, approved, and/or partnered with Delaware-based gun stores in the sale of switchable Glock handguns; worked together with dealers in and around Delaware to sell switchable Glock handguns to Delaware civilians; marketed and advertised switchable Glock guns to Delaware civilians; designed, manufactured, and sold switchable Glock handguns calculated to be purchased by Delaware civilian residents and/or possessed in Delaware; worked in concert and in conspiracy with one another to knowingly do all of the same; and, through their Delaware business dealings, deliberately profited from the Delaware civilian market for switchable Glock handguns.

45. This Court has personal jurisdiction over Glock, Inc. because these claims arise out of and/or relate to Glock, Inc.'s business in the State of Delaware. Glock, Inc. designs, assembles, and imports firearms, and then engages, directly and through its agents and distribution network, in systematic and ongoing business transactions targeting civilian residents of Delaware for marketing and sales of its switchable handguns. Glock, Inc. works directly with retailers, distributors, and other entities located in Delaware to effectuate its goal of marketing and selling its handguns in this State, availing itself of the benefits of the Delaware market.

46. This Court has personal jurisdiction over Glock Limited because it is the principal designer and manufacturer of Glock handguns and works in concert with Glock, Inc. with respect to Glock, Inc.'s foregoing U.S. activities, including its targeting of the Delaware market. In addition, Glock Limited manufactures its Glock handguns and handgun components itself, and intentionally distributes them into the United States via Glock's affiliated distributors and dealers therein, including those in Delaware. Glock Limited also conspires with Glock, Inc. with respect to the foregoing coordinated activities. Glock Limited therefore has sufficient minimum contacts with Delaware, and engages in purposeful availment of the laws of Delaware, sufficient to warrant the Court's exercise of personal jurisdiction over Glock Limited.

47. Venue is proper in New Castle County because Glock has done business in New Castle County, the causes of action arose, in part, in New Castle County, and Defendants' unlawful acts have affected New Castle County residents, among others.

FACTUAL ALLEGATIONS

I. Glock Has Designed, Manufactured, Marketed, and Sold Semi-Automatic Handguns That Can Be Readily Switched into Dangerous Fully Automatic Machine Guns.

A. Delaware Law Prohibits Machine Guns, Which Include Machine Gun Conversion Kits.

48. For civilians, owning, possessing, or operating a machine gun is a crime under Delaware law punishable by imprisonment for up to five years.³¹

49. 11 *Del. C.* § 1444(c)(1) defines a “machine gun” as “any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.”³²

50. This definition also explicitly includes “the frame of a machine gun, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machine gun, and any combination of parts from which a machine gun can be assembled if the parts are in

³¹ 11 *Del. C.* §§ 1444(b)(1), 4205(b)(5).

³² 11 *Del. C.* § 1444(c)(1)(a).

the possession or under the control of a person.”³³ Thus, Glock handguns equipped with an auto sear, or Glock switch, are defined as machine guns under Delaware law.

51. Delaware law also prohibits the possession of “any trigger activator or machine gun conversion kit” and “rapid fire devices,” defined as “a part, kit, tool, accessory, or device that increases the rate of fire of a semi-automatic firearm to a rate of fire that mimics the rate of fire of a machine gun.”³⁴

B. Glock Switches Function Specifically to Turn Semi-Automatic Glock Handguns into Fully Automatic Machine Guns.

52. Semi-automatic handguns 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 Based on this, fully automatic guns meet the legal definition of “machine gun” under Delaware law.

53. Devices that convert semi-automatic guns into fully automatic machine guns are commonly known as “auto sears” because they interact with a part of the gun known as the “sear” to enable automatic gunfire.³⁶

³³ 11 Del. C. § 1444(c)(1)(b).

³⁴ 11 Del. C. § 1444(a)(6).

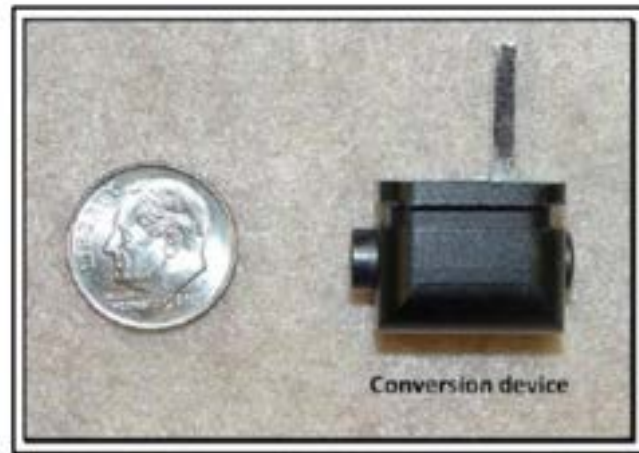
³⁵ William Lawson, *Full Auto vs. Semi-Auto: What’s the Difference?*, THE MAGLIFE BLOG (Apr. 26, 2023), <https://gunmagwarehouse.com/blog/full-auto-vs-semi-auto-whats-the-difference>.

³⁶ *Id.*

54. A “Glock switch” is a type of auto sear designed for use with Glock semi-automatic handguns.³⁷

55. The Glock “switch” name likely comes from the fact that many Glock switches allow for switching or toggling between semi-automatic and fully automatic firing modes.³⁸

56. Glock switches are small and unassuming, typically fashioned out of metal or plastic and are roughly the size of a U.S. coin.³⁹



³⁷ THE SMOKING GUN, *supra* note 7.

³⁸ *Id.*

³⁹ Bureau of Alcohol, Tobacco, Firearms and Explosives, ATF Firearms & Ammunition Technology Division Technical Bulletin 17-04 (2017); *United States v. Freitas*, No. 20-cr-223, ECF No. 42, Ex. 5 to Pl.’s Opp. to Def.’s Mot. to Suppress Evidence (N.D. Cal. May 29, 2020).



57. Attaching a Glock switch is straightforward, quick, and does not require technical knowledge or specialized tools. Like replacing the batteries in a remote control, a user simply removes the plastic slide cover plate from the back of a Glock handgun and attaches the Glock switch. The removal of the cover plate is simple and Glock is aware Glock owners remove it for various modifications as tagged videos on Glock's official Facebook page show.⁴⁰

⁴⁰ See, e.g., Mission Ridge Range & Academy, Tagged Glock on Facebook (May 5, 2020), https://fb.watch/CRZCIXgX_Q/?mibextid=wwXIfr.



58. A Glock switch works by limiting the function of a Glock handgun’s “trigger bar,” which is a large internal mechanism that effectively functions as the “sear.”⁴¹

59. When a Glock switch is not attached, a Glock handgun’s trigger bar ensures the gun only fires one bullet per trigger pull by stopping the striker or “firing pin”—the part of the gun that “strikes” the round to fire the bullet—after one shot is fired.⁴²

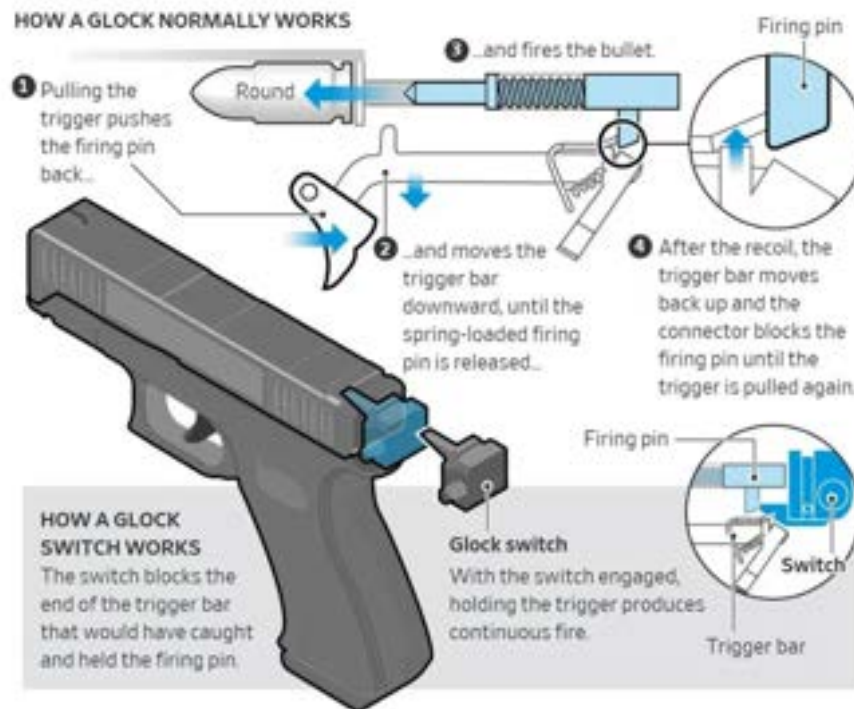
60. When a Glock switch is attached, however, the switch inserts an angled metal or plastic “disconnecter” bar into the back of the gun, thereby “disconnecting” the trigger bar from the striker and preventing the trigger bar from stopping the striker after each shot.⁴³ As a result, when a Glock handgun is equipped with a

⁴¹ Guy McCardle, *Glock Switches: The Tiny Devices Turning Pistols into Machine Guns*, SOFREP (Apr. 15, 2025), <https://sofrep.com/gear/glock-switches-the-tiny-devices-turning-pistols-into-machine-guns>.

⁴² *Id.*

⁴³ THE SMOKING GUN, *supra* note 7.

switch, the unimpeded striker will continue firing bullets with one trigger pull until the trigger is released or the supply of ammunition is exhausted.⁴⁴



61. When equipped with a Glock switch, Glock handguns are machine guns that can fire every bullet in the gun's magazine with one trigger pull in less than a second, up to 1,200 rounds per minute.⁴⁵

C. Fully Automatic Converted Glock Handguns Are Dangerous and Destructive to Public Safety.

62. Conversion of a Glock handgun from semi-automatic to fully automatic, via a Glock switch, significantly limits the ability of a shooter to aim and control the gun.

⁴⁴ *Id.*

⁴⁵ U.S. ATT'Y'S OFF., DIST. OF DEL., *supra* note 21.

63. With a semi-automatic handgun, a shooter must pull the trigger to fire each individual shot, which allows the shooter time to manage the recoil before another bullet is fired. A fully automatic handgun, however, has virtually no period of delay to control the recoil because the shots from one trigger pull are fired almost instantaneously. Fully automatic handguns are therefore difficult to aim and control, even for trained shooters—increasing the likelihood that shooters will spray bullets indiscriminately, hitting unintended victims or property nearby.⁴⁶

D. Glock Switches Are Cheap and Easily Accessible.

64. Glock switches are everywhere. Between 2017 and 2021, the ATF recovered over 5,400 conversion devices, including Glock switches—a more than 570% increase from the 814 conversion devices the ATF had recovered in the previous five years.⁴⁷ ATF recovered 3,769 machine gun conversion parts in 2024 alone.⁴⁸

65. Glock switches are available for purchase online, sometimes for as little as \$10 each. One website selling Glock switches provides a “step-by-step guide” to the “relatively simple process that can be completed in just a few minutes” to attach

⁴⁶ Pitts, *supra* note 12.

⁴⁷ NFCTA, *supra* note 8.

⁴⁸ ATF, *supra* note 9.

the Glock switch.⁴⁹ There have also been numerous videos online explaining how to easily equip a Glock switch in just a few minutes.

66. Foreign entities also contribute to the volume of Glock switches in Delaware. Some overseas Glock switch manufacturers sell their products directly to United States consumers through foreign companies like Alibaba (a China-based retailer); other manufacturers do so through United States companies. The proliferation of Glock switches in Delaware and the broader United States community is largely due to the cheapness and ease of access in ordering from China.⁵⁰

67. More recently, Glock switches have also been marketed, sold, and glorified on social media platforms, where there are numerous videos and posts demonstrating how to attach them.⁵¹ A 2023 Forbes investigation reported finding Glock switches for sale on Facebook, Instagram, and Twitter.⁵²

⁴⁹ *Full Auto Glock Switch Product Page*, GUN SWITCH, <https://gunswitch.org/product/glock-switch> (last visited Oct. 20, 2026).

⁵⁰ THE SMOKING GUN, *supra* note 7.

⁵¹ Alain Stephens & Keegan Hamilton, *Tiny ‘Glock Switches’ Have Quietly Flooded the US With Deadly Machine Guns*, VICE (Mar. 24, 2022, 9:36 AM), <https://www.vice.com/en/article/glock-switches-auto-sears>.

⁵² Cyrus Farivar, *It’s Shockingly Easy to Buy Illegal Gun Modifiers on Instagram, Facebook and Twitter*, FORBES (June 28, 2023, 6:30 AM), <https://www.forbes.com/sites/cyrusfarivar/2023/06/28/its-shockingly-easy-to-buy-illegal-gun-modifiers-on-instagram-facebook-and-twitter/?sh=6254964f67e5>.

68. Lastly, and perhaps most disturbingly, Glock switches can also be made using a 3D printer, allowing for the increase in domestic manufacture of the switches. The patent for Glock switches is publicly available, which allows anyone with the means and intent to create one using a 3D printer.⁵³ Online firearms forums acknowledge that “[i]t’s cheap and easy to produce them . . . [a]nd the plans are available for download to anyone who wants them.”⁵⁴ With a \$100 3D printer, an individual can produce a Glock switch in about 40 minutes, effectively removing the traditional barriers of cost and time.⁵⁵

E. The Design of Many Glock Handguns Allows for Easy Conversion into Illegal Fully Automatic Machine Guns.

1. The Design Differences Between Glock’s Semi-Automatic Handguns and Fully Automatic Handguns Are Minimal.

69. Glock originally designed its semi-automatic handguns for military use. The company’s founder, Gaston Glock, designed the semi-automatic Glock 17

⁵³ See U.S. Patent No. 4,539,889 (filed Apr. 29, 1982).

⁵⁴ Dan Zimmerman, *VIDEO: Young Teens Show Off Their Illegal GLOCK Full-Auto Switches*, *Truth About Guns* (Sept. 29, 2022), <https://www.thetruthaboutguns.com/video-young-teens-show-off-their-illegal-glock-full-auto-switches>.

⁵⁵ Luis Prada, *The ATF Says It’s Finally Tackling 3D-Printed Machine Gun Converters, or MCDs*, *VICE* (Sept. 10, 2024, 11:09 AM), <https://www.vice.com/en/article/atf-3d-printed-machine-gun-converters-mcds>.

model for the Austrian Army, responding to a request for a new handgun to replace World War II models.⁵⁶

70. Later, the Glock 17 (“G17”) became the first Glock handgun released commercially in the United States.⁵⁷ The G17 remains one of the most popular Glock semi-automatic handguns in circulation today.⁵⁸

71. The G17 design remains the foundation of Glock’s handgun business. New Glock handgun models are generally typified by differences in size, differences in ammunition used, or both, without significant changes to mechanics or core features.⁵⁹ Popular Glock handgun models in the United States include the Glock 19 or G19 (a compact frame that shoots 9mm) and the Glock 22 or G22 (a .40 caliber with a standard-sized frame).⁶⁰ Over the years, Glock has also issued updated “generations” of certain models featuring minor changes, such as adding finger grooves to the grip.⁶¹

⁵⁶ *Glock History*, GLOCK, <https://us.glock.com/en/about/history> (last visited Oct. 20, 2026).

⁵⁷ *Complete Guide to 9mm Glocks*, LIBERTYSAFE, <https://www.libertysafe.com/blogs/the-vault/complete-guide-9mm-glocks?srsId=AfmBOorFUapXK82mE-fOzCWCLLN-E8DKSSmnyKHIONCI6EH26Lv18f> (last visited Oct. 20, 2026).

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ *Id.*

72. Glock's semi-automatic handguns have the same basic design as Glock's fully automatic handguns, which are not authorized for sale to civilians.⁶² Glock manufactures a fully automatic handgun, the Glock 18 ("G18"). The G18 is a variation of the G17, with the only prominent difference between the two being the "selector switch" on its side.⁶³ The selector switch allows the G18 to switch between semi-automatic and fully automatic firing.

73. A side-by-side comparison of the G17 and the G18, formerly on Glock's website, demonstrates the similarity in their design.⁶⁴

74. In fact, the automatic-from-the-outset G18 was so similar to the G17, apart from the change in trigger bar function, that, upon information and belief, Glock did not apply for a separate patent for the fully automatic G18, presumably because the G18's specifications fell within the design already patented for the G17.⁶⁵

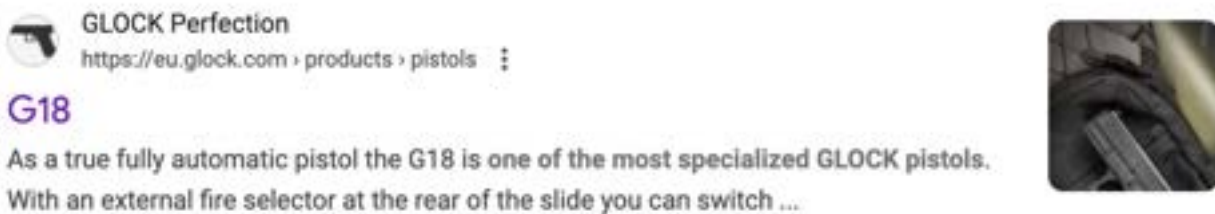
⁶² *Glock 18 & 18C Machine Pistols: How Do They Work?*, YOUTUBE (Mar. 3, 2025), <https://www.youtube.com/watch?v=RTVq3CJoXOM>.

⁶³ *Id.*

⁶⁴ *Glock G17 vs Glock G18*, HANDGUN HERO, <https://www.handgunhero.com/compare/glock-g17-vs-glock-g18> (last visited Oct. 20, 2026).

⁶⁵ See U.S. Patent No. 4,539,889 (filed Apr. 29, 1982).

75. Glock has promoted the G18 and G17 design similarity. In previous years Glock's website, along with Glock enthusiast websites, touted that the G18 had the same characteristics as other previous models and the frame size of the service handgun classic G17.⁶⁶ Glock and other sites also promoted another version of the G18, the Glock 18C, as having the frame size of the original model G17.



76. Although this information and any mention of the G18 has since been removed from Glock's official page, this former presence still goes to show that Glock is and was aware that Glock's most popular handguns hold a troubling similarity to its fully automatic model. For this reason, it only takes a small device like a Glock switch to cross into fully automatic territory.

77. The design similarity between the semi-automatic G17 and fully automatic G18 illustrates why converting semi-automatic Glock handguns into fully automatic machine guns is so easy and prevalent. Only a minimal adjustment, accomplished with the Glock auto sear, is required to switch Glock 17 handguns into fully automatic machine guns. Several Reddit users have commented on the

⁶⁶ *The One Chart That Explains All Glock Pistols Is Finally Here*, AMMUNITION1, <https://www.ammunition1.com/pages/the-one-glock-chart-to-rule-them-all> (last visited Oct. 20, 2026).

similarities between the G18 and the G17, with one user even stating, “The Glock switch probably functions like their G18 slide, so they [Glock] probably knew it was possible [to convert the Glock 17 into a fully automatic weapon]”⁶⁷ Glock itself developed the fully automatic Glock 18 from the Glock 17’s basic design, including adding a selector switch.⁶⁸

78. Glock knows that fully automatic versions of its handguns are difficult to aim and control—particularly when used by individuals without specialized training.⁶⁹ Gaston Glock “enjoyed showing off” the fully automatic G18 to police officers and other potential customers.⁷⁰ During these demonstrations, “[m]any an embarrassed police officer inadvertently peppered the ceiling of the company shooting range with rounds.”⁷¹

⁶⁷ WanderingMistral, Comment to *Was Glock aware how easily convertible their pistols are?*, REDDIT, https://www.reddit.com/r/Glocks/comments/1awiwvl/was_glock_aware_how_easily_convertible_their (last visited Oct. 20, 2026).

⁶⁸ CYBERSHOOTERS, https://www.cybershooters.org/?page_id=528 (last visited Oct. 20, 2026).

⁶⁹ Nick Oetken, *What’s Inside a Glock 18 Pistol*, GUNZONE (Feb. 17, 2024), <https://thegunzone.com/whats-inside-a-glock-18-pistol>.

⁷⁰ PAUL M. BARRETT, GLOCK: THE RISE OF AMERICA’S GUN 60 (1st ed. 2012).

⁷¹ *Id.* at 24.

79. Understanding the dangers of the fully automatic G18, Glock produces and sells the fully automatic G18 handgun to law enforcement and the military only. The G18 is illegal to purchase by civilians because it is a machine gun.⁷²

2. *Glock Markets and Promotes Its “Simple” and “Easy” Design, Which Enables Its Semi-Automatic Handguns to Be Easily Converted into Illegal Fully Automatic Machine Guns.*

80. Glock’s self-described “simple” and “easy” handgun design makes it particularly easy to access internal parts and systems and attach accessories and thereby promotes the switchability of Glock semi-automatic handguns into illegal, fully automatic machine guns.⁷³

81. That Glock’s simple handgun design facilitates easy conversion to illegal Switched Glock Machine Guns is widely known and has been widely reported.⁷⁴ The primary feature of Glock handguns that Glock markets and promotes—“Glock’s internal design, which makes [Glock] parts easy to access and modify”—is also what renders Glock handguns so easy to switch into fully automatic machine guns.⁷⁵

⁷² Peter Suci, *Banned Guns: Why You Can’t Buy the Glock 18 or Glock 25*, NATIONAL INTEREST (May 23, 2020), <https://nationalinterest.org/blog/buzz/banned-guns-why-you-cant-buy-glock-18-or-glock-25-157401>.

⁷³ *Glock Technology*, GLOCK, <https://us.glock.com/en/about/technology> (last visited Oct. 20, 2026).

⁷⁴ Barton, *supra* note 14.

⁷⁵ Stephens & Hamilton, *supra* note 51.

82. Glock showcases the simplicity of its handgun design in its marketing materials and on its website. Glock’s website celebrates that its handguns are “manufactured with only 34 component parts, significantly less than our competitors’ semi-automatic pistol designs.”⁷⁶ Glock also emphasizes the uniqueness of its “simpl[e]” design relative to other semi-automatic handgun manufacturers.⁷⁷

83. Glock brags about how easy it is to disassemble its guns, claiming that “[t]he design of GLOCK modern firearms enables them to be field stripped into four main components without tools in seconds.”⁷⁸

84. Glock encourages its customers to leverage Glock’s handgun design to customize their firearms. With Glock’s knowledge and approval, Glock users equip their handguns with a range of aftermarket accessories and parts.⁷⁹ Glock also knows its customers modify the Glock handgun slide and slide cover plate using aftermarket products.⁸⁰

85. In prior years, Glock’s website advertised how easy it is to customize Glock handguns. Glock’s website had promoted how Glock offers “a wide array of

⁷⁶ GLOCK, *supra* note 73.

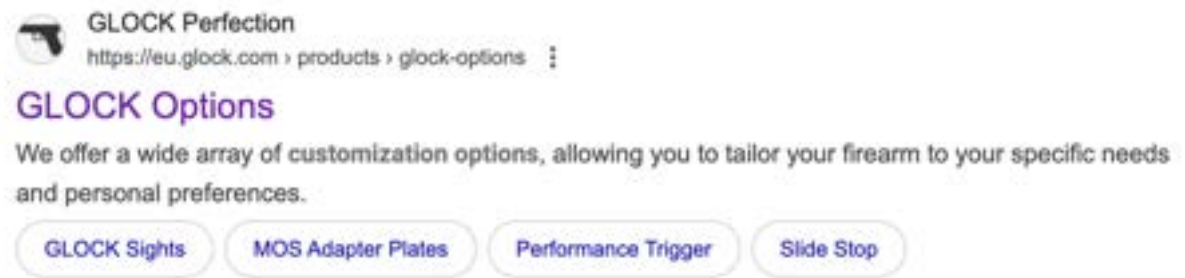
⁷⁷ *Id.*

⁷⁸ *Id.*

⁷⁹ *Oglesbee v. Glock, Inc.*, No. 18-cv-560, Excerpt of Deposition of Carlos Guevara Pursuant to Fed. R. Civ. P. 30(b)(6), ECF No. 283-3, at 66:3-9, 185:4-9 (N.D. Okla. May 22, 2023).

⁸⁰ *Id.*

customization options, allowing you to tailor your firearm to your specific needs and personal preferences.” This language has since been removed from Glock’s official sites.



86. For years, Glock has encouraged companies to develop accessories and aftermarket parts for its handguns. Companies such as “RockYourGlock”⁸¹ and “GlockStore”⁸² use Glock’s trademarked name to encourage customers to equip their Glock handguns with a range of aftermarket accessories and parts. GlockStore, an online gun retailer not directly affiliated with Glock that uses Glock’s trademark in the name of its business, calls itself “The World’s #1 Source for Glock Parts & Accessories.”⁸³ GlockStore promotes custom finishes and parts, including customized slide cover plates.⁸⁴

⁸¹ *Custom Glock Shop*, ROCKYOURGLOCK, <https://rockyourglock.com/custom-glock-shop> (last visited Oct. 20, 2026).

⁸² *Customize*, GLOCKSTORE, <https://www.glockstore.com/customize> (last visited Oct. 20, 2026).

⁸³ *Id.*

⁸⁴ *Id.*

87. The trend of equipping Glock handguns with accessories and aftermarket parts has become so popular that Glock handguns equipped this way are now colloquially known as “Gucci Glocks.” “Gucci Glocks” can be found all over social media. For example, there is a dedicated Instagram account called “Gucci Glocks” that self-describes as “The premier page for #glockporn. Follow to see the most badass Glocks on IG daily:”⁸⁵



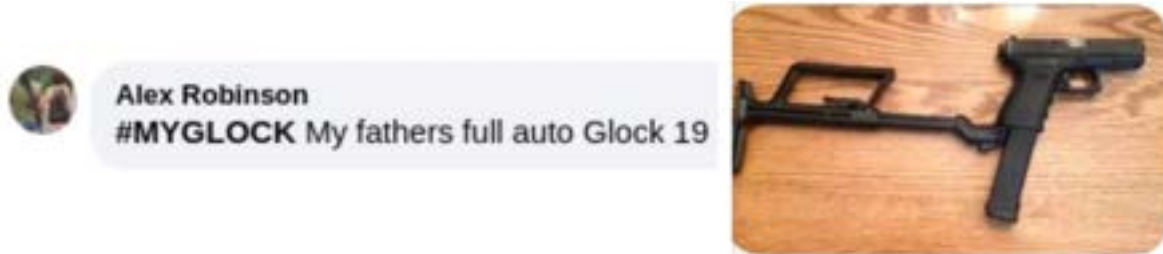
88. Glock has run several social media campaigns encouraging customers to share how they have personalized their Glock handguns. One Facebook post asked “all GLOCK enthusiasts” to “submit your own GLOCK photo using #MyGLOCK” for the chance for their photographs of their handguns to be featured in Glock’s print calendar.⁸⁶ Several users replied to this post with photographs of Glock handguns

⁸⁵ Gucci Glocks (@gucci_glocks), INSTAGRAM, https://www.instagram.com/gucci_glocks/?hl=en (last visited Oct. 20, 2026).

⁸⁶ Comment to *Give Us Your BEST SHOT*, FACEBOOK (Mar. 25, 2016), <https://m.facebook.com/GLOCK/photos/a.158024376796.112283.106625151796/10154038811331797/?type=3&tn=C-R>.

equipped with aftermarket parts. One user submitted a photograph of their Glock 19 handgun: “Custom g19 slide milling polished internals complete 3.5 trigger setup. Extended slide and mag release. Undercut for better grip, mag well cut for reloads. Night sites. Shoots like a dream.”⁸⁷

89. Another user submitted a picture of a Glock handgun that they claimed had been switched to fire fully automatically and appears to be equipped with a Glock switch. The user claimed the handgun was a “full auto Glock 19.”⁸⁸



90. Glock made another Facebook post asking users to describe themselves as their Glock handguns: “There are many great guns out there, but this one is yours. Which GLOCK are you?”⁸⁹ In response, users submitted descriptions and pictures of their Glock handguns. Several of these user responses stated that they have customized their Glock handgun with aftermarket parts. One user wrote “I’m a gen3 G19 w/ Glock Night Sights, with custom dragon scale grip modification, shaved

⁸⁷ *Id.*

⁸⁸ *Id.*

⁸⁹ *Which GLOCK are you?*, FACEBOOK (Oct. 20, 2016), <https://www.facebook.com/GLOCK/posts/there-are-many-great-guns-out-there-but-this-one-is-yours-which-glock-are-you-fi/10154621708276797>.

down grip hump, and a nice trigger job.”⁹⁰ Another user wrote “Glock 23 with an Alpha wolf 9mm conversion barrel.”⁹¹ Another user wrote “Love my 29 also . . . put in a tungsten guide rod with a 21 lb spring for the snappier loads . . . just waiting for my alpha wolf barrel and all will be right in the world!”⁹² Glock responded to this thread of user submissions on this Facebook post: “Hi GLOCK fans. We wanted to give you a shout out for your feedback and participation on this post. We love to see our fans’ enthusiasm . . . keep it coming.”⁹³ Yet another user commented, “Glock 26. G19 magazine with an xgrip to fit your whole hand perfectly . . . replace all springs, aftermarket titanium firing pin, titanium take down pins are nice, aftermarket slide controls (ghost), and an aftermarket mag release (preferably Zev).”⁹⁴

91. In another Facebook post, Glock asked its users “What do you like most about the design of your GLOCK?”⁹⁵ Several users responded by highlighting how Glock’s design allows for easy customization. One user wrote “I like that there is very little about the gun that I haven’t been able to customize, that you don’t have

⁹⁰ *Id.*

⁹¹ *Id.*

⁹² *Id.*

⁹³ *Id.*

⁹⁴ *Id.*

⁹⁵ *What do you like most about the design of your GLOCK?*, FACEBOOK (Aug. 5, 2015), <https://www.facebook.com/photo.php?fbid=10153523110921797&id=106625151796&set=a.158024376796>.

to be a gunsmith to tear it completely apart to access every internal piece. Simplicity.”⁹⁶ Another user wrote “After market parts are usually pretty affordable . . . I like the interchangeable components between pistols.”⁹⁷

92. Most alarmingly, users told Glock that what they liked most about Glock’s handgun design was how easy it was to switch it to a fully automatic machine gun. One user commented on the ability to fire fully automatically: “I love glock 18c rate of fire and just everything.”⁹⁸ Another user wrote “you can make with the cool accesories [sic] full auto the GLOCK pistol.”⁹⁹

93. Online forums among Glock owners and enthusiasts further demonstrate how Glock’s handgun design facilitates the conversion of its semi-automatic handguns into illegal, fully automatic machine guns.

94. On GlockForum.net, one user posted that a Glock switch could be attached to a Glock handgun in minutes after the slide was taken apart by an experienced armorer. One user noted “You can get an auto sear in Thailand. 10 minute job to take apart the slide, probably 3-5 mins for an armorer.” Then another user responded to clarify the ease of conversion: “What? For a Glock? No . . . it’s a

⁹⁶ *Id.*

⁹⁷ *Id.*

⁹⁸ *Id.*

⁹⁹ *Id.*

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.”

95. On another online forum, a user explained how simple it is for a person to attach a Glock switch: “So easy a child can do it.”

96. ATF agents have testified that Glock switches “are designed especially for Glock firearms” and that they can be attached without any specialized training.¹⁰⁰

3. *The Design Features of Many Glock Handguns Allow for Easy Conversion into Machine Guns.*

97. At least two specific design features of most Glock semi-automatic handguns allow them to be easily converted into machine guns.

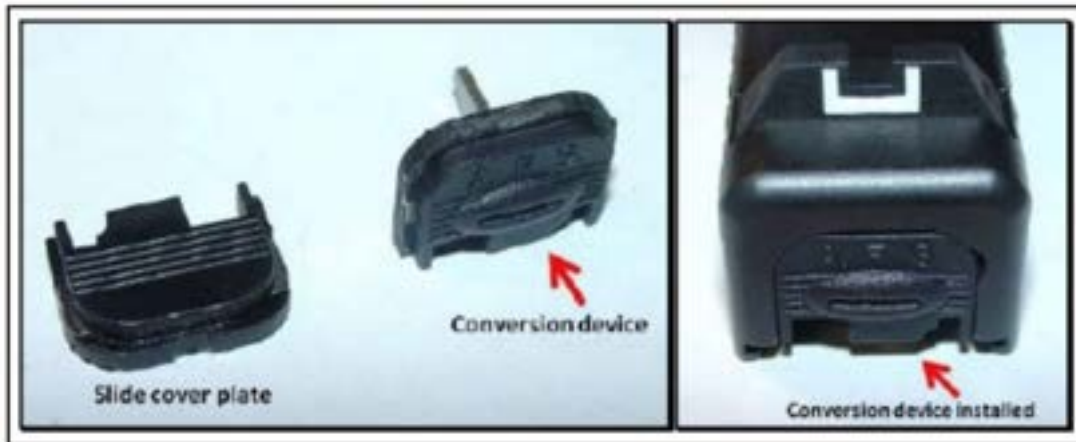
98. First, the design of the slide cover plate or “backplate” allows it to be removed and replaced with a Glock switch.¹⁰¹

99. The slide cover plate is a small plastic piece on the back of the slide, which is the upper part of the handgun that “slides” backwards with recoil. Unlike those of many other gun manufacturers, Glock’s slide cover plate can be easily removed in seconds, without any tools, and with no expertise.¹⁰² A Glock switch can then be easily attached to convert a semi-automatic handgun into a fully automatic machine gun.

¹⁰⁰ See, e.g., *United States v. Williams*, No. 16-cr-89, Trial Tr., Testimony of ATF Agent Michael Powell, ECF No. 130-2, at 201:18-202:4 (N.D. Fla. Jan. 17, 2018).

¹⁰¹ Barton, *supra* note 14.

¹⁰² *Id.*; see also Testimony of ATF Agent Michael Powell, *supra* note 100.



100. Glock designed its slide cover plates to be easily removed without any tools or training, for easy cleaning and assembly. Glock’s slide cover plate “drops right in to your slide” with “no tools required.”¹⁰³

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.	

101. If Glock were to require specialized tools and training to remove the slide cover plate or were to make the plate unremovable, converting Glock’s handguns to fully automatic machine guns would be far more difficult.¹⁰⁴

¹⁰³ *Slide Cover Plate G17/G19 9mm Gen 5 Black*, BROWNELLS, <https://www.brownells.com/gun-parts/handgun-parts/handgun-slides-parts/slide-cover-plate-gen5> (last visited Oct. 20, 2026).

¹⁰⁴ Barton, *supra* note 14.

102. Second, Glock’s design also facilitates the conversion of its semi-automatic handguns into Switched Glock Machine Guns through its trigger bar system design, which is easily accessible and manipulable.

103. Unlike handguns offered by most manufacturers, Glock handguns do not have a traditional external safety. Instead, Glock’s handgun design uses a three-part trademarked internal “safety” system called the Safe Action System. According to Glock, this system is comprised of three internal “independently-operating mechanical safeties.”¹⁰⁵ One of these three internal “safeties” is the trigger bar system, which Glock calls the “drop safety.”¹⁰⁶



104. Since Glock introduced the G17 in 1982, it has employed a striker-fired mechanism in which a single internal component—the hinged “trigger bar”—

¹⁰⁵ *Our Safe Action System*, GLOCK, <https://us.glock.com/en/about/technology/safe-action-system> (last visited Oct. 20, 2026).

¹⁰⁶ *Id.*

normally prevents continuous discharge.¹⁰⁷ Pulling the trigger lowers the trigger bar and releases a spring-loaded striker; the trigger bar then snaps back to stop further firing.¹⁰⁸ If, however, the trigger bar is held down while the trigger remains depressed, the handgun will continue firing until the magazine is empty. Because Glock models share a common platform, a small external add-on fitted into the rear of the handgun can hold the trigger bar down, enabling continuous automatic fire. In short, Glock's striker-fired architecture makes it straightforward to unlock the weapon's inherent capacity for machine-gun fire with a simple modification.

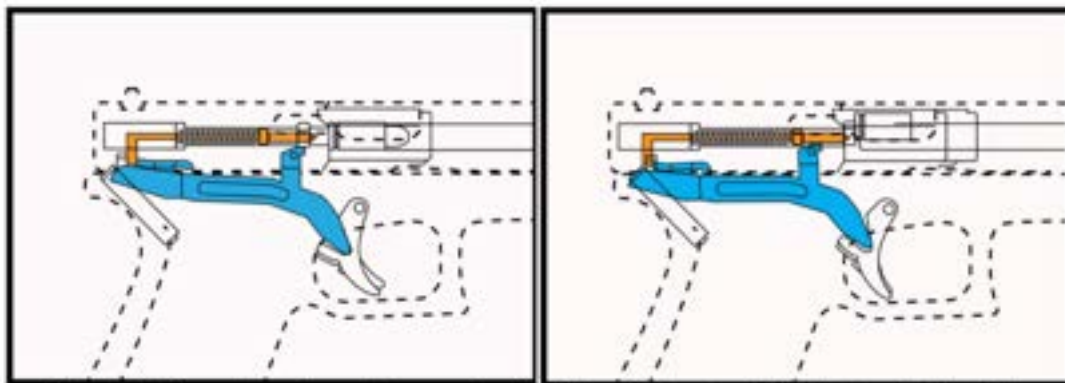


Figure E: Illustration of a semi-automatic Glock handgun before firing (left) and after firing while the trigger is still held down, with the trigger bar preventing the striker from moving forward (right).

105. Glock's trigger bar system makes its handguns more susceptible to conversion to fully automatic machine guns than most other striker-fired handguns. In contrast to other striker-fired handguns, which contain several components connecting the trigger to the sear like a gear, a Glock handgun combines the

¹⁰⁷ *Id.*

¹⁰⁸ *Id.*

functions of a trigger bar and a sear into one piece—the trigger bar.¹⁰⁹ Glock’s trigger bar design provides a relatively large surface area for a Glock switch to target. In addition, nothing shields the large cross-shaped portion of the trigger bar from the back of a Glock handgun, making it possible for a Glock switch’s “disconnecter” to slide between the trigger bar and the striker to contact the trigger bar and push it downward so that the Glock can continue firing with only one pull of the trigger.¹¹⁰

106. Glock claims that its trigger bar system makes its guns safer, marketing its trigger bar system as a key part of Glock’s trademarked SAFE ACTION System.¹¹¹ In reality, however, the design of Glock’s trigger bar system makes its handguns easier to convert into fully automatic machine guns than other semi-automatic handguns sold by Glock’s competitors.

107. In fact, numerous online forums discuss the use of Glock’s internal safety system and the conversion of Glock handguns to Switched Glock Machine Guns. In a Reddit post discussing Glock switches, a user described how Glock’s SAFE ACTION System facilitates the easy attachment and functionality of Glock switches. The user wrote “What is funny is that the Glock safe firing mechanisms are what allows the switch to work and to be so simple.”

¹⁰⁹ Barton, *supra* note 14.

¹¹⁰ McCardle, *supra* note 41.

¹¹¹ GLOCK, *supra* note 105.

108. This ease in Glock switch conversion persists among multiple generations of Glock handguns. For generations 1 through 4 (“Gen 1” through “Gen 4”) of Glock’s handgun models, adding a switch simply requires a screwdriver to slide out the rear removable plastic backplate of the gun’s slide, and place the auto sear into the backplate’s position. Numerous videos available online explain how to easily do so in just a few minutes.¹¹²

109. Glock’s Generation 5 (“Gen 5”) line of handgun models, which entered the market in 2017, requires only sanding down a tab with a file to add a Glock switch.¹¹³ This presents no meaningful obstacle or deterrent to criminals seeking to switch their Glock handguns to machine gun configuration.



¹¹² See, e.g., Letreactcom, *How to Install Glock Full Auto Switch*, FACEBOOK (June 21, 2022, 1:29 AM), <https://www.facebook.com/100063815394590/videos/how-to-install-glock-full-auto-switch/1185300678678624>; see also BaaSicStuff, *Auto Conversion for Any Glock Pistol, in 90 Sec*, YOUTUBE (Mar. 23, 2023), <https://www.youtube.com/watch?v=fSCVPVysdwg>.

¹¹³ Barton, *supra* note 14.

110. Glock could redesign its trigger bar system to make it much more difficult to convert Glock semi-automatic handguns into illegal fully automatic machine guns with Glock switches. But Glock has largely chosen not to do so. A Reddit user asked for the pros and cons of a Glock versus an M&P gun and one user noted that “In my mind, the advantages of the Glock are mostly related to support and logistics: Detailed takedown and maintenance is easier” In stark contrast to Glock handguns, the process of modifying most other popular handguns into machine guns is more time-consuming and difficult.

4. *Glock Historically Refused to Implement Life-Saving Design Changes to Its Glock Semi-Automatic Handguns to Prevent Conversion into Illegal Fully Automatic Handguns.*

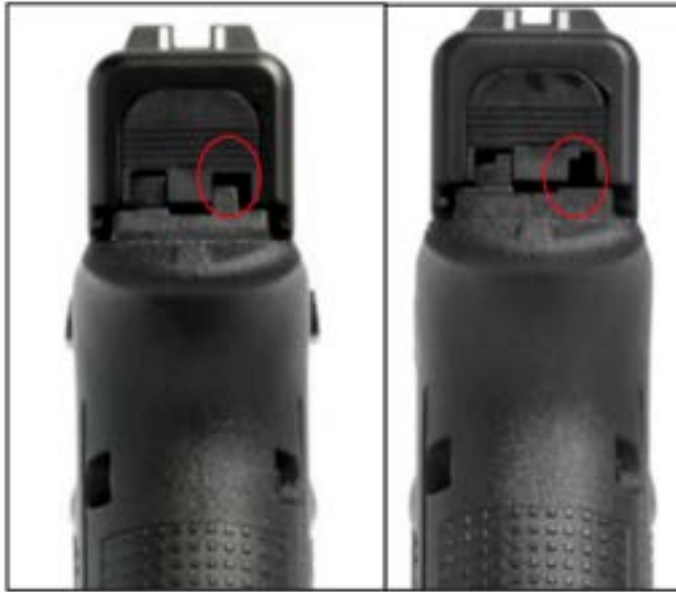
111. Glock has told law enforcement officials that its handguns’ designs cannot be changed to make attaching Glock switches more difficult.¹¹⁴

112. But Glock’s past practices show otherwise.

113. Glock’s Gen 5 handguns included a change to the design of the rear of the frame to include a small tab sticking up to the slide cover plate (shown on the left below) that was missing from earlier models like the Gen 4 (shown on the right).¹¹⁵

¹¹⁴ 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>.

¹¹⁵ *Compare G17 Gen 5*, GLOCK, <https://us.glock.com/en/products/law-enforcement/pistols/g17-gen5> (last visited Oct. 20, 2026) (screenshot generated



114. Glock has not stated publicly that this tab was added in response to concerns about Glock switches. But the tab makes attaching Glock switches slightly more challenging and has no other evident purpose.

115. Unfortunately, the tab was so easy to remove that it has failed to have any meaningful effect on the ease of attachment of Glock switches and their proliferation. The tab could be easily filed down using a metal file without technical knowledge or specialized tools.¹¹⁶ Glock's Gen 5 handguns remained essentially as easy to convert to Switched Glock Machine Guns as previous models.

using 3D rotation feature), *with G17 Gen 4*, GLOCK, <https://us.glock.com/en/products/law-enforcement/pistols/g17-gen4> (last visited Oct. 20, 2026) (same); *see also Glock Gen 5 & 4 Detailed Comparison*, YOUTUBE (Sept. 19, 2017), <https://www.youtube.com/watch?v=QksiKWDBtQs>.

¹¹⁶ Barton, *supra* note 14.

116. In fact, in the time since Glock made this change to its Gen 5 model, Glock switches exploded in popularity despite the tab's addition.¹¹⁷

117. Although adding the tab was ineffective in thwarting the conversion of Glock handguns into illegal fully automatic machine guns, this change shows that Glock had been aware of the problem of Glock switches for years and could have made additional, more effective design changes.

118. A Glock handgun that is not susceptible to the use of switches—the G46—also shows that Glock could thwart conversion of its handguns into illegal fully automatic machine guns. Glock's G46 handgun design has a backplate and striker assembly that comprise one single metal piece, such that the backplate cannot be removed to attach a switch without altogether disabling the gun.¹¹⁸

119. Additionally, Glock's refusal to change its handgun design to be more difficult to modify with a Glock switch is contrary to its marketing claim (shown below) that Glock is "committed to firearm safety."

120. For several years, Glock had: (1) not denounced the aftermarket modification of its handguns; (2) refused to change its handgun design to prevent the addition of Glock switches; (3) allowed its consumers and fanbase to comment

¹¹⁷ NFCTA, *supra* note 8.

¹¹⁸ See Matthew Moss, *EXCLUSIVE PHOTOS: The New German GLOCK 46*, THE FIREARM BLOG (Feb. 5, 2019), <https://www.thefirearmblog.com/blog/2019/02/05/exclusive-photos-new-glock-46>.

and share fully automatic and modified weapons on its Facebook and Instagram pages to the point where, on forums and social media sites, Glock became nearly synonymous with easy modification; and (4) glorified its simple and easy design, knowing that criminals had taken and were currently taking advantage of such features to convert its handguns into fully automatic weapons. None of the above suggests that Glock has been committed to firearm safety.



F. Glock Glorifies Its Fully Automatic Handguns and Encourages Conversion of Its Semi-Automatic Handguns.

121. Even though the Glock 18 is generally illegal to sell and purchase, Glock promotes fully automatic handguns to the public as exciting and “fun.”

122. 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."¹¹⁹



123. Glock's social media post does not indicate that owning or firing the Glock 18 is generally unlawful for regular consumers in the United States because it is a fully automatic machine gun.

124. 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.

¹¹⁹ GLOCK, Inc. (@glockinc), INSTAGRAM (Sept. 8, 2018), <https://www.instagram.com/reel/BneJfLsH3cO>.

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 with bullets emerging in rapid succession. The post does not identify the firearm shot in the video as a G18 unavailable to the civilian public. Rather, the video suggests that this form of “ringing in the New Year” is possible and legal for anyone.¹²⁰

125. In other posts on social media, Glock has displayed images of the G18 and the G18C 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.”

126. Glock continues to show the G18 to visitors at the company’s United States headquarters in Smyrna, Georgia, as “a Glock marketing practice.”¹²¹ One video shows the Glock USA Rangemaster shooting the Glock 18C and showing off its features to headquarters visitors. Pointing to the selector switch that turns the gun to fully automatic, the rangemaster says, “Here’s the, what we call the ‘fun switch,’ that’s one of the names for it.” The rangemaster later shows off firing the G18C one-handed, and visitors are given the chance to fire the G18C themselves.¹²²

¹²⁰ GLOCK, Inc. (@glockinc), INSTAGRAM (Jan. 1, 2023), <https://www.instagram.com/reel/Cm357uAhVox>.

¹²¹ BARRETT, *supra* note 70.

¹²² *The Full Auto Glock 18C Machine Pistol*, YOUTUBE (Aug. 17, 2017), <https://www.youtube.com/watch?v=cc4ZTlsusTQ>.

II. Glock Is Aware That Its Semi-Automatic Handguns Are Routinely Converted into Illegal Machine Guns with Glock Switches Yet Spent Years Declining to Modify Its Design.

127. Glock knows that its semi-automatic handguns are easily and frequently converted to illegal, fully automatic machine guns with Glock switches, and Glock knows that these fully automatic handguns present a significant threat to public safety.

128. Glock even knows that Glock switches often bear Glock's trademarked logo and company name despite being illegal and manufactured by other parties. But Glock has failed to stop infringing use of its trademarks on switches. Glock is aware that some of its own customers even believe that Glock manufactures Glock switches, but has largely failed to warn consumers that Glock switches are illegitimate and illegal.

129. Glock's own social media posts include comments from others promoting Glock switches. But Glock has not deleted or responded directly to such comments to clarify that Glock switches are illegal and dangerous.

130. Glock did not include disclosures on its handguns, instruction manuals, or marketing materials warning purchasers that converting a semi-automatic handgun to a fully automatic machine gun is illegal. Only recently, after much

pushback and litigation, has Glock changed its firearm safety page to include language admonishing converting its handguns into fully automatic weapons.¹²³

131. Even Jorge Leon, the inventor of the Glock switch, suggested that a mid-term or long-term solution to the senseless violence doled out by the Glock switch would be for manufacturers to redesign their handguns to prevent easy conversion.¹²⁴

A. Glock Knew—and Demonstrated—that Its Semi-Automatic Handguns Could Be Easily Switched into Illegal Machine Guns Nearly 40 Years Ago.

132. In April of 1987, Leon, a Venezuelan mechanical engineer and gunsmith, invented a “fire selector system” for use on the G17. The fire selector system manufactured by Mr. Leon’s business used a similar design to many of the Glock switches commonly found in use today.¹²⁵

133. The Glock company has known about Glock switches for decades. Gaston Glock—the founder of Glock—invited Mr. Leon to a Venezuelan shooting range to learn more about the invention himself.¹²⁶ During the demonstration, Gaston Glock personally demonstrated firing the G17 with the early style Glock switch.¹²⁷

¹²³ *Join The Firearm Safety Initiative With Glock*, GLOCK, <https://us.glock.com/en/about/resources/SAFE> (last visited Oct. 20, 2026).

¹²⁴ *EXTENDED INTERVIEW: Inventor of the Glock switch*, YOUTUBE (Feb. 7, 2024), <https://www.youtube.com/watch?v=vxL60e42z5s>.

¹²⁵ *Id.*

¹²⁶ *Id.*

¹²⁷ *Id.*

After examining the fire selector system, Mr. Glock advised Mr. Leon to stop development on the device and to leave it “as a curiosity.”¹²⁸

134. Mr. Leon’s interactions with Mr. Glock demonstrate that Glock has been aware of how its handgun designs allow for easy conversion into fully automatic machine guns for almost four decades.

B. Glock Knows That Conversion of Its Semi-Automatic Handguns Is Done With Glock Switches.

135. Glock knows that many of its semi-automatic handguns are easy to convert into machine guns with Glock switches and that they are being converted throughout the United States, including in Delaware.

1. Glock Knows That Switches Are Being Sold and Being Branded with Glock’s Intellectual Property.

136. In 2019, the Department of Homeland Security (“DHS”) contacted Glock as a part of an investigation into illegally imported Glock switches.¹²⁹ DHS agents spoke with a Glock employee, who admitted that Glock is aware of Glock switches being offered for sale on the internet, including on websites like eBay.¹³⁰

¹²⁸ *Id.*

¹²⁹ *See United States v. Keller*, No. 21-cr-871, Affidavit of Michael Thomas, ECF No. 1-1, at 3-4 (N.D. Ohio Nov. 18, 2021).

¹³⁰ 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 handguns to fully automatic, and, even today, Glock switches continue to be advertised across the Internet and social media platforms. *See id.*

137. As reported by *The Trace*, “Glock switches have become so popular that unwitting customers have mailed them to the company’s headquarters for repairs.”¹³¹

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

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

140. Upon information and belief, on August 22, 2022, Glock’s general counsel forwarded an email from Glock’s outside intellectual property counsel to an ATF employee detailing Glock’s intent to send cease-and-desist letters to someone selling Glock switches on Instagram and YouTube. The email explicitly shows Glock’s knowledge “regarding the infringement of GLOCK’s intellectual property and the sales of illegal full auto switches.”

141. Despite Glock’s knowledge of the infringement of Glock’s intellectual property rights with Glock switches, Glock switches branded with Glock’s logo

¹³¹ Chip Brownlee, *ATF Director Urges Action on Auto Sears ‘Flooding Our Communities’*, THE TRACE (Mar. 1, 2023), <https://www.thetrace.org/2023/03/atf-auto-sears-dettelbach-machine-gun>.

remain readily available. Glock further refuses to fix the underlying design of its handguns to prevent the use of such Glock switches that use the Glock logo.

2. *High-Profile Shootings With Glock Switches Have Spurred Government Action.*

142. Glock is also plainly aware that its semi-automatic handguns are being turned into Switched Glock Machine Guns based on widespread reporting about shootings involving Glock switches and government actions to address the problem.

143. On October 25, 2021, United States Senators Amy Klobuchar and Cory Booker issued a public letter calling on Attorney General Merrick Garland to take action against the “proliferation” of auto sears and fully automatic guns. Although “the Department of Justice [had already] prosecuted numerous people for illegally possessing conversion devices and converting semi-automatic firearms into fully automatic weapons,” the proliferation was contributing to the “rise” of “[g]un related homicides.”¹³²

144. In April 2022, a shooting on a crowded street in downtown Sacramento, California, was carried out with a Glock handgun equipped with a Glock switch. The shooting killed six people and wounded twelve, and police recovered more than 100

¹³² Letter from Sen. Amy Klobuchar and Sen. Cory A. Booker to Merrick Garland, U.S. Att’y Gen., U.S. Dep’t of Just. (Oct. 25, 2021), https://www.klobuchar.senate.gov/public/_cache/files/8/5/85995b61-ac5a-47a1-99ea-3f86d2d12c4f/7B303332BDF415CE6FFD12D8A97A59D8.letter-from-sen.-klobuchar-and-sen.-booker-to-ag-garland-re-auto-sears-and-other-conversion-devices-dated-10.25.2021-final-.pdf.

cartridge casings at the scene. In response to this tragedy, 40 members of Congress signed another letter urging action against the proliferation of fully automatic Glock handguns.¹³³ The letter was publicly released and called out Glock specifically. Representative Jake Auchincloss, who signed the letter, succinctly explained Glock’s responsibility: “If they know that their Glocks can be retrofitted with auto sears that easily, and they’re not preventing it with simple design changes, that becomes a product liability.”¹³⁴

145. More shootings involving Glock handguns converted into fully automatic machine guns with Glock switches occurred later the same year. In May 2022, nine people were shot—some multiple times—in a mass shooting with a Glock 19 equipped with a switch in the highly trafficked Magnificent Mile district of Chicago.¹³⁵

146. In September 2021, multiple Houston police officers were injured or killed in a shooting involving a Glock handgun that had been converted into a fully

¹³³ Letter from Lizzie Fletcher & Carolyn B. Maloney to Marvin Richardson, Acting Director of the ATF (Apr. 11, 2022), https://carbajal.house.gov/uploadedfiles/2022-04-11_letter_to_atf_on_auto_sears_final_copy.pdf.

¹³⁴ Alain Stephens & Champe Barton, *What Can the ATF Do About Converted Machine Guns?*, THE TRACE (June 9, 2022), <https://www.thetrace.org/2022/06/atf-auto-sears-regulation-glock-switch>.

¹³⁵ Frank Main, Tom Schuba, Matt Kiefer & Cheryl W. Thompson, *In Chicago, handguns turned into high-capacity machine guns fuel deadly violence*, NPR (Oct. 28, 2022, 5:00 AM), <https://www.npr.org/2022/10/28/1131026241/chicago-handgun-violence-auto-sear-machine-gun>.

automatic weapon with a Glock switch. During that incident, the officers approached the shooter’s home to execute an arrest when he opened fire, killing one officer and wounding another.¹³⁶

147. On March 19, 2024, the City of Chicago sued Glock to hold Glock accountable for making and selling handguns that are easily turned into machine guns with Glock switches.¹³⁷

148. On March 26, 2024, the Delaware Attorney General, together with the Attorneys General of eleven other states and the District of Columbia, sent Glock a letter demanding that it do something to address 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.’”¹³⁸

149. On September 21, 2024, in Birmingham, Alabama, several people opened fire with handguns equipped with Glock switches, killing four people and injuring 17 others. The shooting’s aftermath was like a “horror movie.” Again, over

¹³⁶ *HPD officer killed, another wounded while executing warrant in NE Harris Co.*, Fox26 (Sept. 20, 2021, 2:19 PM), <https://www.fox26houston.com/news/hpd-2-officers-wounded-in-shooting-in-northeast-houston>.

¹³⁷ *City of Chicago v. Glock, Inc.*, No. 2024CH02216, Complaint (Cook Cnty. Cir. Ct., Ch. Div. Mar. 19, 2024). Chicago withdrew and refiled its suit against Glock in June 2024.

¹³⁸ Letter to Carlos Guevara, General Counsel, Glock, Inc. (Mar. 26, 2024), https://www.ag.state.mn.us/Office/Communications/2024/docs/Glock_MultistateLetter.pdf.

100 shell casings were recovered. Law enforcement believes the shooters' use of Glock switches enabled them to quickly release a barrage of bullets.¹³⁹

150. Following the Birmingham attack, President Biden issued an Executive Order on September 26, 2024, signaling the severity of the threat posed by Glock switches. The Executive Order established the Emerging Firearms Threats Task Force, tasked with developing “a risk assessment and strategy to stop the proliferation of machinegun conversion devices, with a particular emphasis on the devices used to convert a standard, semiautomatic firearm to a machinegun.”¹⁴⁰

151. On November 10, 2024, a switch-equipped Glock handgun killed an 18-year-old and injured sixteen others at Tuskegee University in Alabama. One student reported that she heard more than 100 rounds of gunshots and said the scene felt like a “war zone.”¹⁴¹

152. Both Minnesota and New Jersey filed suit against Glock on December 12, 2024, for manufacturing, marketing, and selling handguns that it knows can

¹³⁹ Michelle Watson, Paradise Afshar, Lauren Mascarenhas & Amy Simonson, *Up to \$100,000 in rewards offered for tips to solve Birmingham shooting that left 4 people dead*, CNN (Sept. 23, 2024), <https://www.cnn.com/2024/09/23/us/birmingham-shooting-what-we-know/index.html>.

¹⁴⁰ Exec. Order No. 14127, *Combating Emerging Firearms Threats and Improving School-Based Active-Shooter Drills*, 89 Fed. Reg. 80345 (2024).

¹⁴¹ Toriano Porter, *My daughter ran for her life during Tuskegee University mass shooting. And I'm not OK*, THE KANSAS CITY STAR (Nov. 15, 2024, 1:20 PM), <https://www.kansascity.com/opinion/opn-columns-blogs/toriano-porter/article295526079.html>.

easily be converted into fully automatic weapons with Glock switches.¹⁴² Maryland and the City of Baltimore soon followed suit on February 12, 2025,¹⁴³ and the City of Seattle on September 2, 2025.¹⁴⁴

153. Given the national attention following these shootings and resulting responses from federal, state, and local governments, Glock knew or should have known about mass shootings perpetrated with Glock switch-converted Glock handguns and the resulting deaths and injuries.

3. *Reports Show The Rise in Violent Crime Goes Hand In Hand With Glock Handguns Being Converted Into Illegal Machine Guns Using Glock Switches.*

154. Media and policy reports have highlighted the use of Glock handguns in crime—including Glock handguns converted into fully automatic machine guns with Glock switches.

155. A March 2022 *VICE News* article surveyed over 260 federal cases that were filed between 2017 and 2021, including robberies, assaults, and murders, that involved the use of converted, fully automatic machine guns. The survey found that,

¹⁴² *State of Minnesota v. Glock, Inc.*, No. 27-CV-24-18827, Complaint (Minn. Dist. Ct. Dec. 12, 2024); *State of New Jersey v. Glock, Inc.*, No. ESX-C-000286-247, Complaint (N.J. Super. Ct. Dec. 12, 2024).

¹⁴³ *Mayor & City Council of Baltimore v. Glock, Inc.*, No. C-24-CV-25-001450, Complaint (Md. Cir. Ct. Feb. 12, 2025).

¹⁴⁴ *City of Seattle v. Glock, Inc.*, No. 25-2-25158-6, Complaint (Wash. Sup. Ct. Sept. 2, 2025).

in 2017, there were only 10 such cases, but by 2019, that had risen to 82, and in 2021 there were 83 cases filed that involved the use of converted machine guns.¹⁴⁵

156. *VICE* also reported that ATF had “seized 1,500 weapons modified with auto sears in 2021, a staggering increase over 2020, when only 300 were recovered.” In total, from 2020 to 2022, “Homeland Security had seized 4,348 auto sears and opened up over 600 investigations related to the devices.”¹⁴⁶

157. In January 2023, ATF released a report on crime guns recovered and traced by law enforcement in the United States and its territories between 2017 and 2021. ATF’s report found Glock was the leading manufacturer of handguns used in crimes across the country: “Of the 1,306,804 pistol type crime guns traced between 2017 and 2021, nearly 20% (255,055) were manufactured by Glock.”¹⁴⁷

158. Glock handguns are attractive for criminal purposes because of their ease of conversion to fully automatic weapons. Thomas Chittum, former ATF Associate Deputy Director, explained, “[i]t’s not enthusiasts who want to have a

¹⁴⁵ Stephens & Hamilton, *supra* note 51.

¹⁴⁶ *Id.*

¹⁴⁷ *NFCTA: Crime Guns – Volume Two, Part III: Crime Guns Recovered and Traced within the United States and its Territories*, at 19, <https://www.atf.gov/media/15426/download>.

machine gun but can't afford a legal one. . . . It's criminals who want as much firepower as they can get, and that's part of the danger.”¹⁴⁸

159. Gang members have been known to use switch-equipped Glock handguns because they deliver a fully automatic spray of bullets at their intended targets.¹⁴⁹

160. The epidemic of converted automatic handguns has been confirmed by federal, state, and local law enforcement around the country. For example:

- a. Nationwide: ATF reported a 400% increase in recoveries of switched machine guns from 2020 to 2021 and a 570% increase in machine gun conversion parts recovered between 2017 and 2021 as compared to the previous five-year period. These numbers prompted federal officials to directly contact Glock in search of ways to modify the weapon to make it harder to attach switches.
- b. Dallas: Officials reported a 2,750% increase in auto sear recoveries from 2021 to 2022.
- c. Louisville: Officials reported an 800% increase in auto sear recoveries from 2021 to 2022.
- d. St. Louis: Officials reported a 575% increase in auto sear recoveries from 2021 to 2022.
- e. Oklahoma City: Officials reported a 500% increase in Glock switch recoveries from 2021 to 2022 and a nearly 330% increase from 2022 as of November 2023.

¹⁴⁸ Stephen Montemayor, *Modern-Day Machine Guns*, STAR TRIBUNE (Oct. 18, 2023), <https://www2.startribune.com/guns-switches-turning-more-firearms-into-automatic/600312536>.

¹⁴⁹ Stephens & Hamilton, *supra* note 51.

161. Given the public reporting on the rampant use of Glock handguns equipped with Glock switches, Glock knew or should have known that its handguns have been illegally converted into machine guns and used to carry out numerous crimes, including crimes in Delaware.

162. In addition, when a crime gun is traced, ATF “begins by contacting the manufacturer” to follow the gun’s path through the supply chain.¹⁵⁰ Glock is alerted each and every time that a Glock firearm is recovered at a crime scene and traced by law enforcement.

¹⁵⁰ Phil Rogers & Shelby Bremer, *How Crime Guns Are Traced in the U.S.: One Page at a Time*, NBC 5 Chicago (Sept. 16, 2021, 10:49 PM), <https://www.nbcchicago.com/violence-in-chicago/how-crime-guns-are-traced-in-the-us-one-page-at-a-time/2615068>; see also Brian Freskos, *How a Gun Trace Works*, THE TRACE (July 8, 2016), <https://www.thetrace.org/2016/07/how-a-gun-trace-works-atf-ffl/>; Eric Flack, *Former ATF agent: Current gun tracing system is ‘insane,’* WUSA9 (May 1, 2018), <https://www.wusa9.com/article/news/investigations/former-atf-agent-current-gun-tracing-system-is-insane/65-547682302>.

III. Glock Handguns Equipped with Switches Are Spreading Disaster Across the Nation and in Delaware.

A. Gun Violence Is a Public Health Crisis and the Number One Cause of Death of Children in the United States.

163. On June 14, 2016, the American Medical Association (“AMA”) adopted a policy calling gun violence in the United States “a public health crisis” requiring a comprehensive public health response and solution.¹⁵¹

164. On June 25, 2024, United States Surgeon General Dr. Vivek Murthy issued a Surgeon General’s Advisory on Firearm Violence, declaring firearm violence in America to be a public health crisis.¹⁵² The Surgeon General’s Advisory recognized that firearms are the leading cause of death for children and adolescents.

165. In 2020, guns surpassed motor vehicles as the number one cause of death for children ages 1-18.¹⁵³

¹⁵¹ *AMA calls gun violence “a public health crisis,”* AMERICAN MEDICAL ASSOCIATION (June 14, 2016), <https://www.ama-assn.org/press-center/press-releases/ama-calls-gun-violence-public-health-crisis>.

¹⁵² *Firearm Violence: A Public Health Crisis in America*, U.S. DEP’T HEALTH AND HUM. SERVS., OFFICE OF THE SURGEON GENERAL (2024), https://www.ncbi.nlm.nih.gov/books/NBK605169/pdf/Bookshelf_NBK605169.pdf.

¹⁵³ Robert Gebeloff, Danielle Ivory, Bill Marsh, Allison McCann & Albert Sun, *Childhood’s Greatest Danger: The Data on Kids and Gun Violence*, N.Y. TIMES (Dec. 14, 2022), <https://www.nytimes.com/interactive/2022/12/14/magazine/gun-violence-children-data-statistics.html>.

B. Glock Handguns Equipped with Switches Have Harmed Delawareans.

166. The proliferation of Glock handguns equipped with switches has put communities in Delaware at greater risk of deadly harm from machine gun fire.

167. Federal courts have described Glock handguns equipped with a Glock switch as “much more dangerous than just a handgun.” Additionally, as one court explained, “[a] handgun is also smaller than a typical machinegun, making it more difficult to control, and therefore more dangerous, once a Glock Switch is added.”¹⁵⁴

168. Because machine guns are generally prohibited, fully automatic gunfire in Delaware was, until recently, relatively rare. This has now changed. The result is a dangerous new reality with which Delaware communities must now live.

169. Behind the alarming data cited above are people whose lives have been forever changed by the violence inflicted with fully automatic Glock handguns. As a result of Glock’s handgun design and marketing and refusal to change the design, Delawareans have lost family and friends and suffered life-changing injuries.

170. In 2024, a Middletown resident was found with a machine gun converted with a Glock switch ordered from China and subsequently arrested and charged.¹⁵⁵

¹⁵⁴ *United States v. Fisher*, No. 1:23-CR-00045-MR-WCM, 2024 WL 589115, at *2 (W.D.N.C. Feb. 13, 2024).

¹⁵⁵ U.S. ATT’Y’S OFF., DIST. OF DEL., *supra* note 21.

171. During a 2019 law enforcement search of a Newark resident's home, officers found two Glock switches, along with a firearm.¹⁵⁶

172. In 2025, two 20-year-olds were found in possession of a Glock that had been illegally converted with a Glock switch and loaded with a high-capacity magazine during a routine traffic stop.¹⁵⁷

173. Three victims were injured in an April 2022 shooting involving a Glock equipped with a switch that fired multiple rounds, 15 of which struck the victims' unsuspecting vehicle.¹⁵⁸

174. And these are only some of many such cases. Glock's unreasonable and unlawful practices of designing, manufacturing, assembling, marketing, advertising, and distributing into Delaware large numbers of switchable guns significantly contribute to the danger that exists on Delaware's streets, private and public homes, and neighborhoods. By continuing to market and distribute a handgun that is so easily switchable into a machine gun—and failing to take even modest steps at any point along the chain of distribution to reduce the prevalence or allure of Switched Glock Machine Guns—Glock has made Delaware less safe. It has done so in order to sell more guns, putting profit over people's lives.

¹⁵⁶ U.S. ATT'Y'S OFF., DIST. OF DEL., *supra* note 23.

¹⁵⁷ Harinder, *supra* note 24.

¹⁵⁸ *See supra* note 25.

IV. Glock's Recent Actions, Including an Announcement to Produce "V Series" Handgun Models, Do Not Address Past and Present Public Nuisance.

175. As of October 21, 2025, Glock confirmed rumors that it would be discontinuing the production of all Glock handguns outside of the G43, G43X, and G48 models, and instead produce a "V Series" of pistols.¹⁵⁹ Rumors and industry buzz suggested this sudden announcement was born out of litigation pressure from other municipalities and a decision to finally make Glock handguns more difficult to modify.



The GLOCK V Series is Coming

Yesterday, a retailer NOT affiliated with GLOCK Inc. made premature statements concerning the availability of certain GLOCK pistols. The individuals making these representations are not authorized to speak for GLOCK.

As part of GLOCK's commitment to future innovations, we are making necessary updates to our product line to align with upcoming offerings. Our dedication continues to be with maintaining the highest level of quality, reliability, and accessibility that you expect from GLOCK.

The GLOCK V Series is here to establish a baseline of products while simplifying our processes.

V Models will be available on shelves and for media loan December 2025. GLOCK V Series pistols are marked on the slide and frame with a „V.“

¹⁵⁹ Luke McCoy, *CONFIRMED: GLOCK V Series Is Real — And We're Getting Our Hands on the G19 V and G45 V*, USA CARRY (Oct. 21, 2025), <https://www.usacarry.com/confirmed-glock-v-series-is-real-and-were-getting-our-hands-on-the-g19-v-and-g45-v>.

176. When Glock's V Model was announced, people immediately started speculating that switches for the new design would soon be available¹⁶⁰:



177. A firearms social media influencer named Brandon Herrera stated in an interview: "I'll put a hundred bucks cash on the line that if we get our hands on the new Glock Model V within two weeks, we can build a switch for it. We can convert it to full auto."¹⁶¹

178. These predictions soon proved correct. Within days of the Glock V Model release, social media postings and videos stated and depicted that the V Model was convertible into a machine gun. In November 2025, numerous videos, photographs, and postings demonstrated that the V Model was convertible into a machine gun, with Glock switches for the V Model/Series already having been

¹⁶⁰ HoboCoastie, Comment to Hands-On With The NEW Glock V Model!, YouTube, <https://perma.cc/C26F-67XV> (last visited Oct. 20, 2026); Spongebob-j3y, Comment to Hands-On With The NEW Glock V Model!, YouTube, <https://perma.cc/C26F-67XV> (last visited Oct. 20, 2026).

¹⁶¹ Timcast News (@TimcastNews), X (Oct. 21, 2025, 2:10 PM), <https://perma.cc/K2R4-ZM5C>.

designed, made, and used.¹⁶² Postings included images showing conversion of the new design with a switch, telling Glock to “try again”¹⁶³:



¹⁶² See, e.g., *Spectacular failure of the Glock V Series?*, *Glock V Switch Update*, <https://perma.cc/SP2W-RJVY> (last visited Oct. 20, 2026); *The new glock V*, YouTube, <https://perma.cc/3UNQ-TP5P> (last visited Oct. 20, 2026); *All that nonsense for nothing*, Reddit, https://www.reddit.com/r/Glocks/comments/1ozyy92/all_that_nonsense_for_nothing (last visited Oct. 20, 2026); Larry Z, *Glock Fail! ‘Unconvertible’ V-Series Already Defeated!*, GunsAmerica (Nov. 19, 2025), <https://perma.cc/4A8U-D6A4> (“Well . . . that didn’t take long. Glock rolled out its brand-new V-series, the big, bold answer to lawsuits claiming their pistols were ‘too easy’ to convert, and the gun world took about five minutes to prove the point Glock desperately hoped no one would test.”); *NEW Glock V-Series Already Defeated?! Switch Workaround EXPOSED*, YouTube, <https://perma.cc/NT27-49ZL> (last visited Oct. 20, 2026); *THE MAD LADS ALREADY DID IT*, YouTube, <https://perma.cc/89C4-ETC8> (last visited Oct. 20, 2026).

¹⁶³ *Spectacular failure of the Glock V Series?*, *Glock V Switch Update*, <https://perma.cc/SP2W-RJVY> (last visited Oct. 20, 2026).



179. On December 6, 2025, Glock announced that Glock's new Gen 6 handgun products would be available on store shelves on January 20, 2026.¹⁶⁴ Glock's announcement was silent about machine gun conversion. The Gen 6 is available in stores now.¹⁶⁵

180. Because the Glock Gen 6 and the V Model share the same design changes intended to deter the conversion of the handgun into a machine gun, the Gen 6 can also likely be easily converted into a machine gun.

¹⁶⁴ *GLOCK Reveals the Highly Anticipated 6th Generation of GLOCK Pistols*, Glock, <https://perma.cc/9QRS-2HV9> (last visited Oct. 20, 2026).

¹⁶⁵ See, e.g., *Glock Gen 6: Everything You Need To Know*, YouTube, https://www.youtube.com/watch?v=u_WDeFE7_U8 (last visited Oct. 20, 2026).

181. According to a report from *AmmoLand*, which received early access to the Gen 6 at a marketing event at Glock, Inc.’s headquarters in Smyrna, Georgia, “[t]he changes made to the V Series pistols are present here in the Gen 6 pistols. Glock has been proactive in making design changes to prevent known machinegun conversion devices from functioning in their products.”¹⁶⁶

182. Comments and social media posts related to the Gen 6 predict that the Gen 6 will also be able to be converted into a machine gun.¹⁶⁷

183. Glock has also released the G43X CA in California, which was officially added to the California Department of Justice’s handgun roster on September 29, 2026.¹⁶⁸ Design details about the G43X CA have not yet been released publicly.

184. Glock’s recent actions are nothing short of an admission that change is both necessary and long overdue. Even assuming Glock’s design changes are

¹⁶⁶ Duncan Johnson, *NEW GLOCK Gen 6 Review The Future of Perfection*, AmmoLand (Dec. 13, 2025), <https://perma.cc/CK73-EZVK>.

¹⁶⁷ See, e.g., NomadicGunner, Comment to *Gen 6 officially announced by Glock*, Reddit, https://www.reddit.com/r/Firearms/comments/1pfvqk7/gen_6_officially_announced_by_glock (last visited Oct. 20, 2026) (“I give it 2 weeks till the hood installs a auto sear.”); Iamnivek, Comment to *NEW GLOCK Gen 6 Review The Future of Perfection*, AmmoLand (Dec. 13, 2025), <https://perma.cc/CK73-EZVK> (“[T]here are rumors that they have already developed a glock switch that works for the new Glock.”).

¹⁶⁸ *Recently Added Handgun Models*, STATE OF CAL. DEP’T OF JUST., <https://oag.ca.gov/firearms/certified-handguns/recently-added>.

effective in preventing the conversion of its handguns into machine guns, Glock must take further steps to remedy the harm it has already caused. The company must address the current and ongoing public nuisance its deadly Switched Glock Machine Guns are causing today, and not just plan to quash their future harm.

CAUSES OF ACTION

Count One

Public Nuisance by Conduct Unreasonable Under All the Circumstances in Violation of Section 3930

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

186. The Attorney General brings this count pursuant to 10 *Del. C.* § 3930.

187. Under § 3930(b), “[a] firearm industry member, by conduct unlawful in itself or unreasonable under all the circumstances, may not knowingly or recklessly create, maintain, or contribute to a public nuisance through the sale, manufacturing, importing, or marketing of a firearm-related product.”

188. Defendants are each a “firearm industry member” under Section 3930(a)(1).

189. The switchable Glock handguns described herein are “firearm-related products” under § 3930(a)(2) and (a)(4).

190. Defendants’ conduct of designing, manufacturing, assembling, advertising, marketing, and distributing easily switchable Glock handguns, when a

reasonable alternative design could impede such machine gun functionality, is unreasonable under all the circumstances described herein. *See* 10 *Del. C.* § 3930(b).

191. Defendants' unreasonable conduct has knowingly or recklessly created, maintained, or contributed to a public nuisance within the meaning of Section 3930(b). "'Public nuisance' means a condition which injures, endangers, or threatens to injure or endanger or contributes to the injury or endangerment of the health, safety, peace, comfort, or convenience of others or otherwise constitutes a public nuisance under common law." 10 *Del. C.* § 3930(a)(5). A violation of subsection (b) is a public nuisance. 10 *Del. C.* § 3930(d).

192. Defendants' unreasonable conduct has foreseeably and proximately created, maintained, or contributed to this harm. The harm to the public is a reasonably foreseeable effect of Defendants' conduct, and Defendants' conduct therefore constitutes a proximate cause of the public nuisance notwithstanding any intervening actions, including criminal actions by third parties. 10 *Del. C.* § 3930(e). The Attorney General is not required to demonstrate that Defendants acted with the intent to engage in a public nuisance or otherwise cause harm to the public. 10 *Del. C.* § 3930(h).

193. Converted Glock machine guns have increasingly proliferated in Delaware, including among persons prohibited from purchasing or possessing a firearm on the basis of a prior felony or other disqualifier, and are particularly

popular among gang members. Converted Glock machine guns are becoming increasingly central to violent gun crimes in the State.

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

195. Defendants' violation of Section 3930(b) entitles the Attorney General to an injunction prohibiting Defendants from "continuing the conduct or engaging in the conduct or doing any acts in furtherance of the conduct," 10 *Del. C.* § 3930(f)(1); "[a]n order providing for abatement of the nuisance" at Defendants' expense, *id.* § 3930(f)(2); restitution, *id.* § 3930(f)(3); compensatory and punitive damages, *id.* § 3930(f)(4); reasonable attorneys' fees, filing fees, and reasonable costs of the action, *id.* § 3930(f)(5); and any other appropriate relief, *id.* § 3930(f)(6). Injunctive relief is necessary here to prevent further, continuing, and irreparable injury.

Count Two

Public Nuisance by Conduct Unlawful in Itself in Violation of Section 3930 (Sale and Transfer of Firearms Readily Adaptable for Use as Machine Guns, 11 *Del. C.* § 1444)

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

197. The Attorney General brings this count pursuant to 10 *Del. C.* § 3930.

198. Under Section 3930(b), a firearm industry member may not, by conduct unlawful in itself, knowingly or recklessly create, maintain, or contribute to a public nuisance through the sale, manufacturing, importing, or marketing of a firearm-related product.

199. Under 11 *Del. C.* § 1444(a)(5), a person is guilty of possessing a destructive weapon—a felony—when the person “sells, transfers, buys, receives or has possession of a . . . machine gun or any other firearm or weapon which is adaptable for use as a machine gun.”

200. Defendants’ conduct has been unlawful in itself. Through the actions described herein, Defendants have knowingly sold and transferred, and continue to sell and transfer, into and for the Delaware civilian market firearms which are adaptable for use as machine guns within the meaning of 11 *Del. C.* § 1444(a).

201. Defendants' unlawful conduct has knowingly or recklessly created, maintained, or contributed to a public nuisance within the meaning of Section 3930(b) and (d).

202. Defendants' unlawful conduct has foreseeably and proximately created, maintained, or contributed to this harm, notwithstanding any intervening actions, including criminal actions by third parties. 10 *Del. C.* § 3930(e).

203. Switched Glock Machine Guns have increasingly proliferated in Delaware, including among persons prohibited from purchasing or possessing a firearm, and are increasingly central to violent gun crimes in the State. This condition injures and endangers the health, safety, peace, comfort, and convenience of Delaware residents. Defendants have created, maintained, and/or contributed to this condition, and have done so knowingly or recklessly.

204. Defendants' violation of § 3930(b) entitles the Attorney General to the full relief set forth in 10 *Del. C.* § 3930(f), including injunctive relief, abatement at Defendants' expense, restitution, compensatory and punitive damages, attorneys' fees, and costs.

Count Three

Public Nuisance by Conduct Unlawful in Itself in Violation of Section 3930 (Aiding and Abetting Violations of 11 *Del. C.* § 1444, Pursuant to 11 *Del. C.* § 271)

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

206. The Attorney General brings this count pursuant to 10 *Del. C.* § 3930.

207. 11 *Del. C.* § 1444(a) makes it a felony to sell, transfer, buy, receive, or possess a machine gun or any other firearm or weapon which is adaptable for use as a machine gun.

208. Under 11 *Del. C.* § 271, a person is guilty of an offense committed by another person when, intending to promote or facilitate the commission of the offense, the person aids, counsels, or agrees or attempts to aid the other person in planning or committing it.

209. Defendants' purposeful conduct aids, agrees to aid, facilitates, promotes, solicits, and participates in violations of 11 *Del. C.* § 1444 and is itself in violation of these provisions. Defendants have knowingly aided and abetted the illegal possession of machine guns in Delaware. And Defendants have knowingly aided and abetted the manufacture, transport, shipment, sale (including resale), and/or disposal of machine guns. Defendants' conduct has therefore been unlawful in itself.

210. Defendants' unlawful conduct of designing, assembling, advertising, selling, distributing, manufacturing, and/or marketing of switchable Glock handguns, which Defendants know can function as machine guns, has knowingly or recklessly created, maintained, or contributed to a public nuisance within the meaning of 10 *Del. C.* §§ 3930(b) and (d).

211. Defendants' unlawful conduct has foreseeably and proximately created, maintained, or contributed to this harm, notwithstanding any intervening actions, including criminal actions by third parties. 10 *Del. C.* § 3930(e).

212. This condition injures and endangers the health, safety, peace, comfort, and convenience of Delaware residents. Defendants have created, maintained, and/or contributed to this condition, and have done so knowingly or recklessly.

213. Defendants' violation of Section 3930(b) entitles the Attorney General to the full relief set forth in 10 *Del. C.* § 3930(f).

Count Four

Failure to Establish and Implement Reasonable Controls in Violation of Section 3930

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

215. The Attorney General brings this count pursuant to 10 *Del. C.* § 3930(c).

216. Under Section 3930(c), “[a] firearm industry member shall establish and implement reasonable controls regarding the manufacture, sale, distribution, use, and marketing of the firearm industry member’s firearm-related products.”

217. “Reasonable controls” means “reasonable procedures, safeguards, and business practices that are designed to,” among other things: “[p]revent the sale or distribution of a firearm-related product to a straw purchaser, a firearm trafficker, a person prohibited from possessing a firearm under state or federal law, or a person who the firearm industry member has reasonable cause to believe is at substantial risk of using a firearm-related product to harm themselves or unlawfully harm another or of unlawfully possessing or using a firearm-related product;” “[e]nsure that the firearm industry member complies with all provisions of state and federal law and does not otherwise promote the unlawful manufacture, sale, possession, marketing, or use of a firearm-related product;” and “ensure that the firearm industry member does not engage in an act or practice in violation of subchapter II or subchapter III of Chapter 25 of Title 6.” 10 *Del. C.* § 3930(a)(6).

218. Defendants have failed to establish and implement reasonable controls regarding the manufacture, sale, distribution, use, and marketing of easily switchable Glockes in at least two respects.

219. First, Defendants lack reasonable procedures, safeguards, and business practices that are designed to ensure they comply with all provisions of state law, including 11 *Del. C.* § 1444.

220. Second, Defendants lack reasonable procedures, safeguards, and business practices that are designed to ensure that they do not otherwise promote the unlawful sale, manufacture, distribution, marketing, possession, or use of a firearm-related product.

221. Defendants' failures to establish and implement reasonable controls arise from knowing acts or omissions, including the conduct described herein: retaining a design Defendants know renders their pistols readily switchable to illegal machine guns; declining to adopt feasible design modifications implemented elsewhere; continuing to supply dealers identified as outsized sources of crime guns without adequate monitoring, discipline, or termination; and marketing conduct that promotes and glamorizes machine gun conversion.

222. A violation of Section 3930(c) is a public nuisance. 10 *Del. C.* § 3930(d).

223. Defendants' violation of Section 3930(c) has foreseeably and proximately caused harm to Delaware, notwithstanding any intervening actions, including criminal actions by third parties. 10 *Del. C.* § 3930(e).

224. Defendants' violation of Section 3930(c) entitles the Attorney General to the full relief set forth in 10 *Del. C.* § 3930(f).

Count Five

Common Law Public Nuisance

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

226. Nothing in 10 *Del. C.* § 3930 restricts or alters the availability of an action for relief from or to remedy a public nuisance at common law. 10 *Del. C.* § 3930(k).

227. By the conduct alleged herein, Defendants have created, maintained, and contributed to a condition that unreasonably interferes with rights common to the general public, and that injures, endangers, and threatens to injure and endanger the health, safety, peace, comfort, and convenience of the public in Delaware, constituting a public nuisance at common law.

228. Defendants' conduct was a substantial factor in bringing about, and a proximate cause of, the public nuisance, and the resulting harm was reasonably foreseeable to Defendants. The criminal conversion and misuse of Defendants' pistols was objectively and reasonably foreseeable to Defendants and does not sever the causal link between Defendants' conduct and the resulting harm.

229. The State, as sovereign and as *parens patriae*, has suffered and continues to suffer harm from the public nuisance, including deaths and injuries to its residents and substantial public expenditures for law enforcement, emergency response, health care, and victim services.

230. The State is entitled to abatement of the nuisance at Defendants' expense, injunctive relief, and all other appropriate relief.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff the State of Delaware, by and through the Attorney General, respectfully requests judgment in its favor and against Defendants as follows:

- a. An order that the conduct alleged violates 10 *Del. C.* § 3930 and constitutes a public nuisance under Delaware law;
- b. Ordering injunctive relief as to civilian consumers in Delaware as is necessary to prevent continuing harm, including an order permanently enjoining Glock from distributing readily switchable handguns for sale to Delaware civilian consumers, and from continuing the conduct alleged herein or doing any acts in furtherance thereof;
- c. Awarding the Attorney General an order providing for abatement of the nuisance at the Defendants' expense;

- d. Awarding the Attorney General restitution in an amount to be determined at trial, including disgorgement of profits;
- e. Awarding compensatory and punitive damages;
- f. Awarding the Attorney General reasonable attorneys' fees, filing fees, and all costs and expenses incurred in connection with this action;
- g. Awarding pre- and post-judgment interest as permitted by law; and
- h. Awarding the Attorney General such other and further relief as the Court deems just and proper.

Dated: October 22, 2026

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Respectfully submitted,

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