

The NJ SAFE Office: A Model for State Attorney General-Led Firearms Industry Enforcement

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Cover photo, courtesy of the New Jersey Office of the Attorney General; from Oct. 17, 2025 press conference announcing a new complaint against the firearm manufacturer, Sig Sauer.

Executive Summary

EXECUTIVE SUMMARY

The New Jersey Statewide Affirmative Firearms Enforcement (SAFE) Office represents a groundbreaking model for holding the firearms industry accountable, through state-level civil enforcement, for misconduct that contributes to firearm death and injury. Created in 2022, SAFE is the first dedicated unit within a state Attorney General’s (AG) office focused exclusively on affirmative civil enforcement targeting firearms industry misconduct. In its first three years, the office has brought more civil suits against members of the firearms industry than any state AG in history.¹ The office’s work demonstrates that targeted, sufficiently-resourced state enforcement efforts can overcome longstanding assumptions around firearms industry immunity, drive measurable changes in industry behavior, and meaningfully reduce public safety risks associated with firearms and improve public safety outcomes in our communities.

“*In its first three years, the office has brought more civil suits against members of the firearms industry than any state AG in history.*”

SAFE emerged as a central pillar of New Jersey’s response to rising gun violence and a growing recognition that firearms had long been treated as exceptional—largely insulated from the legal accountability applied to other dangerous (or even routine) consumer products. Through the application of various state laws and exercising its authority granted by New Jersey’s firearms industry accountability statute, the SAFE Office treats firearms like any other product whose design, marketing, and distribution must meet reasonable public safety standards and comply with state law.

Since its creation in 2022, SAFE has brought significant enforcement actions against negligent firearms industry actors up and down the supply chain, including firearms dealers, gun shows, ammunition sellers, and major manufacturers. And the office’s focus sends a clear message to the public that the work targets industry misconduct that contributes to firearm injury and death in our communities, not lawful gun users. Early cases addressed unsafe storage practices, unsafe ammunition practices, and the unlawful sale of ghost guns into New Jersey communities. The resulting settlements and court orders resulted in monetary awards, compliance obligations, independent monitoring, and operational reforms—demonstrating that civil enforcement has rapidly disrupted pathways through which firearms flow into criminal illegal markets, and make our communities safer.

Building on its early successes, SAFE applied its focus upstream to firearms manufacturers whose misconduct (like their design and marketing decisions) have created major public safety harms.

¹ State of New Jersey, Office of the Attorney General, Oct. 17, 2025, press conference announcing a new complaint against the firearm manufacturer, Sig Sauer.

Most notably, in 2024 New Jersey, alongside its partners in Minnesota, filed suit against Glock, alleging that the company knowingly manufactured and sold handguns that could be easily converted into illegal machine guns using inexpensive “switch” devices.² In November 2025, facing mounting legal pressure and additional lawsuits from Maryland, the City of Chicago, the City of Baltimore, and the City of Seattle, Glock announced it would discontinue certain handgun models and redesign its products to contain new features meant to prevent machine gun conversion—an extraordinary example of manufacturer-level behavior change driven by state civil enforcement (though the efficacy of these changes against the next iteration of switch designs is yet to be determined).³

Beyond any individual case, SAFE has helped reframe firearms industry accountability as a matter of ordinary corporate responsibility. Courts, regulators, and industry actors are increasingly recognizing that the federal Protection of Lawful Commerce in Arms Act (PLCAA) does not provide blanket immunity for unlawful misconduct. Leveraging its authorizing statute, as well as longstanding public nuisance, product liability, negligence, and consumer protection laws, SAFE’s enforcement efforts have contributed to a growing body of case law demonstrating that meaningful accountability is both legally viable and effective.

The office’s influence now extends beyond New Jersey. In 2024, New Jersey Attorney General Matthew Platkin announced the formation of the first-ever multistate coalition of sixteen state attorneys general dedicated to firearms industry accountability, facilitating coordination on investigations, legal strategy, and parallel litigation.⁴ This collaborative approach reflects the reality that many firearms industry practices—and the harms they produce—are national in scope and demand coordinated inter-state action.

SAFE’s impact has been realized with a small, specialized team and a modest budget, underscoring the efficiency and scalability of the model. Central to its effectiveness are a clear affirmative enforcement mandate from the AG, dedicated funding, multidisciplinary staffing that integrates legal and investigative expertise, and strong relationships with law enforcement and other state agencies.

The experience of the New Jersey SAFE Office demonstrates that replicating this model in attorneys general’s offices across the country is both feasible and essential. As gun violence continues to claim tens of thousands of lives each year, state AGs possess powerful and underutilized tools to address the problem at its source: enforcing the law against industry actors whose misconduct fuels preventable harm. The SAFE model offers a clear roadmap for doing so—and for making firearms industry accountability the norm rather than the exception.

² State of New Jersey, Office of the Attorney General, “[Glock Complaint](#),” December 12, 2024.

³ Champe Barton, “[Facing Legal Pressure, Glock Revamps Pistols to Prevent Machine Gun Conversions](#),” *The Trace*, November 24, 2025.

⁴ State of New Jersey, Office of the Attorney General, “[AG Platkin Steps Up Efforts to Combat Gun Violence Through Coalition with Other States](#),” December 12, 2024.

Methodology and Acknowledgments

METHODOLOGY

This report is based on interviews conducted in late 2025 with staff members of the NJ SAFE Office, the Executive Office of the NJ AG, external counsel for the state of New Jersey, affected community members, and other subject matter experts. The authors also reviewed publicly available documentation of actions taken by the SAFE Office, including case documents, office directives, and media reports. In addition, the authors conducted desk research on firearms industry accountability efforts across the country and by other key stakeholders.

This report reflects interviews conducted in late 2025 and is based on the staffing and leadership in place at that time. Changes in administration or personnel occurring after the research period are not incorporated into the narrative. References to the Attorney General and staff throughout the report refer to the individuals serving in those roles in 2025.

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Introduction



INTRODUCTION

In April 2023, an 18-year old shooter fired 28 rounds from a Glock 9mm handgun outside the Oscar Miles Housing Complex in Newark, NJ.⁵ The shooting, which injured three people, lasted just over one second.⁶ This is because the shooter had attached a machine gun conversion device, or “Glock switch,” to his handgun, making it function as a machine gun. Glock switches are small metal or plastic devices, similar in size and shape to a Lego brick.⁷ They can be purchased on the street for less than \$20 or easily be made by 3D printers, and can be installed in minutes.⁸ When fitted with a Glock switch, a Glock handgun can fire at a rate of approximately 1,200 rounds per minute, faster than many fully automatic weapons used by the US military.⁹

Machine gun conversion devices like the Glock switch were increasingly showing up at crime scenes. The federal Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) reported that more than 5,400 such parts were recovered between 2017-2021 – a 570% increase over the previous five-year period.¹⁰ In December 2024, New Jersey Attorney General Platkin (alongside the Minnesota Attorney General Keith Ellison) sued Glock for manufacturing, marketing, and distributing handguns that Glock knew could be easily used as machine guns through the installation of a Glock switch.¹¹ According to New Jersey’s lawsuit, Glock has been aware of this vulnerability for decades, dating back to at least 1988, when company founder Gaston Glock demonstrated an early Glock switch prototype.¹²

In November 2025, facing mounting pressure from New Jersey and Minnesota—whose lawsuits against Glock had survived motions to dismiss – and similar lawsuits from other jurisdictions like Maryland, the City of Chicago, the City of Baltimore, and the City of Seattle,¹³ Glock announced that it would discontinue two of its signature handgun lines and replace them with a new product line with features meant to impede the installation of a machine gun conversion device.¹⁴ After years of denying that it had either the responsibility or the capability to design handguns resistant

⁵ United States Attorney’s Office, District of New Jersey, “[Member and Associate of Newark Street Gang Charged with Unlawful Possession of Machinegun Used in Shooting of Three People](#),” *press release*, April 13, 2023.

⁶ State of New Jersey, Office of the Attorney General, “[Glock Complaint](#),” December 12, 2024.

⁷ *Ibid.*

⁸ *Ibid.*

⁹ Fox 4 Dallas-Fort Worth, “[ATF Shows How Glock Switch Works](#),” *YouTube*, June 10, 2024.

¹⁰ ATF, “[National Firearms Commerce and Trafficking Assessment \(NFCTA\), Volume II](#),” February 2023.

¹¹ State of New Jersey, Office of the Attorney General, “[Glock Complaint](#),” December 12, 2024.

¹² *Ibid.*

¹³ Colleen Murphy, “[Glock Under Fire as N.J. Lawsuit Over Illegal Machine Gun Conversions Clears Major Hurdle](#)”, *NJ.com*, October 16, 2025.

¹⁴ Champe Barton, “[Facing Legal Pressure, Glock Revamps Pistols to Prevent Machine Gun Conversions](#),” *The Trace*, November 24, 2025.

to switches,¹⁵ Glock’s decision to make design changes to its handguns demonstrates the power of affirmative firearms industry enforcement actions and the important role of state Attorneys General (AGs).

New Jersey’s lawsuit against Glock is exactly the type of case that the New Jersey SAFE Office was created to bring. As NJ AG Platkin noted, “SAFE was built to hold bad actors accountable at every level, including some of the largest firearms manufacturers in the world. We weren’t going to shy away from any fight, no matter how large or litigious the company might be. If you profit from bloodshed, we will hold you accountable.”¹⁶

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¹⁵ Ibid.

¹⁶ Interview with Matthew Platkin, November 25, 2025.

The Role of State AGs in Industry Accountability

THE ROLE OF STATE AGs IN INDUSTRY ACCOUNTABILITY

State AGs have long played a pivotal role in holding powerful industries accountable when their practices have driven widespread public harm. In the early 1990s, over 400,000 deaths per year were attributed to smoking, representing approximately 20% of all deaths in the US.¹⁷ Serving as the tip of the spear, state AGs began to sue tobacco companies in 1994, alleging that the industry knowingly misled the public about the dangers of smoking, hid or downplayed research on health risks, and misrepresented the addictiveness of nicotine. State AG-led enforcement actions expanded over the following years, and in 1998, 52 AGs representing states and territories signed a Master Settlement Agreement (MSA) with the four biggest tobacco companies in the US, obtaining over \$200 billion in monetary damages, imposing significant restrictions on how tobacco products could be marketed, and publicly disclosing millions of industry documents.¹⁸ Since the MSA, the adult cigarette smoking rate in the US has decreased by more than half (24.7% to 11.6%), and the youth smoking rate has decreased even more (down to 3.8% in 2021).¹⁹ As a result, tobacco-related death rates—including deaths from lung cancer and other smoking-related diseases—have declined in recent decades.²⁰ In contrast, there is a long way to go to maximize state AG-led enforcement of firearms industry malfeasance. Between 2005-2025, only eight state AGs²¹ have brought affirmative civil enforcement lawsuits against gun industry actors.²²

Meanwhile, firearm death rates in the US have been on the rise. Over the last 25 years of available data, the number of people per year killed with firearms went from nearly 29,000 in 1999 to nearly 47,000 in 2023 (a 33% increase in the firearm death rate).²³ Since 2020, firearms have been the leading cause of death for children in the US (ages 1-17), killing more children than car crashes or cancer.²⁴ The New Jersey SAFE Office was born in response to this reality. “If you’re going to treat the gun violence epidemic like the public health crisis it is, then you have to use every tool available,” said New Jersey Attorney General Platkin, “and that includes industry accountability, the same as you would do with any other industry causing harm—like the tobacco industry, the opioid industry, or the car industry.”

¹⁷ CDC, “[Cigarette Smoking-Attributable Mortality and Years of Potential Life Lost—United States, 1990](#),” *Morbidity and Mortality Weekly Report*, August 1993.

¹⁸ National Association of Attorneys General, “[The Master Settlement Agreement](#),” accessed December 15, 2025; California Office of the Attorney General, “[Master Settlement Agreement](#),” accessed December 15, 2025.

¹⁹ American Lung Association, “[Overall Smoking Trends](#),” accessed December 15, 2025.

²⁰ Nandika Mansingka et al, “[Trends in the Incidence and Mortality of Tobacco-Related Cancers Among Adults in the United States](#),” *Cancers*, 17(3), February 2025.

²¹ California, Connecticut, District of Columbia, Maryland, Minnesota, New Jersey, New York, Washington.

²² This does not include investigations or warnings. For example, the Delaware Attorney General’s investigation of [Cabela’s ammunition security practices](#) and the Massachusetts Attorney General’s [investigation against a gun dealer](#).

²³ CDC, “CDC WONDER Underlying Cause of Death data, 1999-2023.”

²⁴ Johns Hopkins Bloomberg School of Public Health, “[New Report Highlights US 2022 Gun-Related Deaths: Firearms Remain Leading Cause of Death for Children and Teens, and Disproportionately Affect People of Color](#),” September 2024.

This was the approach of the NJ AG: to treat firearms like any other high-risk consumer product, and to bring enforcement actions against violations of law that had resulted in significant harm. “We were pretty clear that we were going to use the tools that the legislature gave us to hold bad actors accountable up and down the supply chain,” Platkin said, adding, “There’s nothing radical about this approach. What was radical was the way firearms had been treated in the wake of PLCAA.” Platkin was referring to the Protection of Law Commerce in Arms Act (PLCAA), a 2005 federal law that bars certain types of lawsuits against manufacturers and sellers of firearms.²⁵ But recent litigation—including by the families of victims of the Sandy Hook Elementary School shooting, which won a \$73 million settlement from the firearms-maker Remington Arms²⁶ and the District of Columbia AG’s \$4 million judgment against Polymer80²⁷ – demonstrated that PLCAA does not confer blanket immunity.

²⁵ Protection of Lawful Commerce in Arms Act (PLCAA), [15 U.S.C. §§ 7901–7903](#) (2005), is a federal statute that bars certain lawsuits against licensed manufacturers and sellers of firearms that seek civil liability for harms resulting from the criminal or unlawful misuse of firearms by third parties. The statute contains several exceptions, including for actions alleging that a defendant knowingly violated a state or federal law applicable to the sale or marketing of firearms and that such violation proximately caused the harm alleged (the “predicate exception”).

²⁶ Dave Collins, “[Sandy Hook families settle for \\$73M with gun maker Remington](#),” *AP*, February 15, 2022.

²⁷ Office of the Attorney General for the District of Columbia, “[AG Racine Wins Judgment Against Ghost Gun Manufacturer Polymer80 & Secures \\$4 million In Penalties](#),” August 2022.

The Creation of the NJ SAFE Office

THE CREATION OF THE NJ SAFE OFFICE

In 2022, New Jersey enacted a new firearms industry accountability law. Passed in the wake of the Uvalde Elementary School mass shooting in Texas, which killed 19 students and two teachers;²⁸ and the Buffalo, NY, mass shooting at a grocery store, in which a white supremacist killed 10 Black people, the law:

- Established a cause of action against firearms industry members that “knowingly or recklessly” create or contribute to a public nuisance; and
- Mandated that firearms industry members adopt several “reasonable controls” as defined by the statute.²⁹

The new statute also authorized the AG to conduct investigations and bring civil lawsuits against firearms industry members who appear to have violated the law.³⁰ In order to effectuate this authority, the legislature allowed the AG to “delegate” these enforcement actions to a new unit within the office.³¹ “While the AG already had the authority—rooted in our Criminal Justice Act of 1970—to organize such a department, we saw significant value in creating formal standing through official legislative acknowledgement,” said Stephan Finkel, the Legislative Director for the NJ AG. “Having a statutory foundation provides additional legitimacy—and signals that the authority comes from the people’s representatives, not just from an AG’s political preferences.”³²

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Subsequent to the enactment of this new firearms industry accountability law, NJ AG Platkin issued a directive creating a first-of-its-kind Statewide Affirmative Firearms Enforcement (SAFE) Office. The directive established that the SAFE Office would be led by a Director reporting to the AG; would have

²⁸ Adam Fullerton, “[Uvalde School Shooting: Where Things Stand 3 Years Later](#),” *Fox 7 Austin*, May 24, 2025. Carolyn Thompson, “[Prosecutors to Seek Death Penalty for White Supremacist Who Killed 10 at Buffalo Supermarket](#),” *AP*, January 12, 2024.

²⁹ [NJ Rev Stat § 2C:58-35](#) (2022).

³⁰ *Ibid.*

³¹ NJ Rev Stat [§ 2C:58-35](#) (2022).

³² Interview with Stephan Finkel, November 18, 2025.

the authority to enforce the state’s new firearms industry accountability law; and would have access to the full expertise and resources of the NJ Department of Law and Public Safety.³³

According to AG Platkin, the SAFE Office – in its current size – is a “small but mighty” team of six, including leadership, two staff attorneys, and two senior investigators.³⁴ SAFE’s first hires, in October 2022, were Director Ravi Ramanathan and Deputy Director Jeremy Ershow—senior attorneys with experience in both public and private litigation.³⁵ Together, they set the office’s enforcement priorities, and worked to establish legitimacy within the AG’s office as well as across other state agencies. “One of our first mandates from the AG was to socialize ourselves with various parts of the office and other agencies we ultimately needed to work with,” said Director Ramanathan.³⁶ This involved engaging key stakeholders across the Division of Law, the State Police, the Regional Operations and Intelligence Center (an inter-agency fusion center operated by the New Jersey State Police), and other state entities to ensure broad support and recognition of the office’s mission.

At the same time, SAFE leadership began pursuing initial case leads, identifying resource needs, and mapping out a long-term staffing plan that would allow the office to grow strategically and sustainably. In 2023, the office added two attorneys with complementary civil and criminal backgrounds—Zachary Rynar and Shira Arnow—significantly enhancing in-house capacity and ensuring that the office could manage complex cases. These staff attorneys became integral to shaping the office’s legal strategy.

The investigative team was designed to maximize law enforcement expertise and institutional knowledge. SAFE’s two senior investigators—Eric Barlow and Reinaldo Roldan—have extensive backgrounds in state and federal law enforcement, and are retired from the New Jersey State Police and ATF, respectively. These investigators act as credible liaisons with law enforcement and help identify and investigate potential wrongdoing by firearms industry actors.

The AG’s leadership team was also “heavily involved in SAFE’s casework,” said Director Ramanathan, “Senior leadership was integrated with us every step of the way.”³⁷ This included regular monthly meetings between SAFE leadership and AG Platkin, and a front office liaison working with SAFE from the outset. “AG Platkin’s support was key to establishing our credibility and legitimacy within the state government and externally,” noted Director Ramanathan.³⁸

Funding for SAFE has been modest relative to its impact. Prior to FY 2024, the office’s operating costs

³³ State of New Jersey, Office of the Attorney General, “[Attorney General Administrative Executive Directive No. 2022-08](#),” July 25, 2022.

³⁴ Interview with Matthew Platkin, November 25, 2025

³⁵ RLS Media, “[NJ Appoints Leaders of New Firearms Enforcement Unit](#),” September 7, 2022.

³⁶ Interview with Ravi Ramanathan, November 7, 2025.

³⁷ Ibid.

³⁸ Ibid.

were absorbed internally by the Attorney General Office’s (AGO) existing budget. In FY 2024, SAFE received its first dedicated legislative appropriation of \$450,000, a level that has remained consistent through the state’s FY 2025 and FY 2026’s budgets.³⁹ The office is now funded through a combination of this appropriation and AGO’s operating budget. “It’s not an astronomical amount of money,” said NJ AG Platkin, “Our budget demonstrates how much you can get done with a relatively small amount of resources.”⁴⁰ SAFE has also leveraged legal counsel from the Division of Law, as well as pro bono legal counsel for added capacity and expertise, notably through its partnership with the law firm, Pillsbury Winthrop Shaw Pittman, on the Glock and ghost gun litigation.⁴¹



Source: New Jersey Office of the Attorney General, Dec. 11, 2023, press conference announcing new civil complaints against Pennsylvania Gun Show Company, Eagles Shows, and a New Jersey Gun Dealer Under NJ Public Nuisance Law.

³⁹ The State of New Jersey, [“The State of New Jersey Appropriations Handbook, Fiscal Year 2026.”](#) accessed December 15, 2025.

⁴⁰ Interview with Matthew Platkin, November 25, 2025

⁴¹ Pillsbury, [“Pillsbury Acting as Special Counsel to New Jersey Attorney General in Pathbreaking Glock Lawsuit,”](#) December 13, 2024.

Identifying and Developing First Cases

IDENTIFYING AND DEVELOPING FIRST CASES

From the start, the SAFE Office sought to focus on misconduct and other violations, and to obtain legal and strategic precedents that would put the office and its authorities on firm footing. The office understood that its first cases would be key to establishing its credibility. The office's first cases needed to be on what Deputy Director Ershow described as “the most solid ice”—cases involving flagrant violations, immediate public safety risks, and indisputable evidence of culpability.⁴² This ethos shaped how cases were selected, how investigations were structured, and how legal theories were developed in the office's earliest months. “Our credibility depends on choosing cases where the facts are strong, the law is clear, and the harm is real,” Director Ramanathan noted.⁴³ As the SAFE Office sifted through its investigative leads, it homed in on two cases: a loss incident at a retail firearms dealer and the flow of ghost guns coming from gun shows in Pennsylvania.

“Our credibility depends on choosing cases where the facts are strong, the law is clear, and the harm is real,” Director Ramanathan noted.

Investigative Approach: Methodical, Multi-Layered, and Grounded in Public Safety

SAFE's first cases emerged from concrete tips about parallel law enforcement investigations against gun dealers, supplemented by combing through publicly available information like firearms dealers with ATF inspection violations and court records from cases involving recovered crime guns. SAFE used this information to identify potentially lawbreaking firearms sellers. From there, SAFE deployed more formal investigative tools such as subpoenas, sworn statements, and expert analysis to assess whether the conduct amounted to a violation of New Jersey law.

December 2023: First Lawsuits Filed

The SAFE Office's first civil enforcement lawsuits were directly responding to documented public safety harms. One involved the proliferation of ghost guns—unserialized, untraceable firearms assembled from kits or parts sold without background checks.⁴⁴ These weapons—though banned in the state—had become a growing problem in New Jersey, appearing with increasing frequency at crime scenes.⁴⁵ “When we looked at the police recovery data, ghost guns jumped out immediately—they were showing up in shootings, in robberies, in places where we almost never used to see them,” said Deputy Director Ershow.⁴⁶

⁴² Interview with Jeremy Ershow, November 7, 2025.

⁴³ Interview with Ravi Ramanathan, November 7, 2025.

⁴⁴ Michelle Rotuno-Johnson, “[Criminals Use ‘Ghost Guns’ More Often in Camden County Crimes, Officials Say](#),” *Patch.com*, November 1, 2022.

⁴⁵ *Ibid.*

⁴⁶ Interview with Jeremy Ershow, November 7, 2025.

In December 2023, SAFE filed a civil complaint against ghost gun seller JSD Supply and the gun show Eagle Shows.⁴⁷ Eagle Shows operates in Pennsylvania, just across the New Jersey border; and JSD Supply was one of the vendors selling products there.⁴⁸ SAFE investigators found that Eagle Shows had purposely chosen its Pennsylvania gun show location for its proximity to New Jersey’s South Jersey communities, including Camden, “intentionally making [illegal ghost gun products] readily accessible to New Jersey residents.”⁴⁹ Through Senior Investigator Barlow’s thorough review of EAGLE Shows owner Jordan Vinroe’s social media history and podcast interviews, SAFE was able to use Vinroe’s own words to show how New Jersey was intentionally targeted. SAFE’s complaint also included photos of billboards placed along the New Jersey Turnpike advertising upcoming Eagle Shows just across the border, demonstrating how deliberate the outreach to New Jersey residents had become.⁵⁰

By filing suit against JSD Supply and Eagle Shows, the SAFE Office sent a clear message: sellers cannot hide behind state lines to supply banned weapons to New Jersey residents. As Deputy Director Ershow put it, the case “showed we could trace a pattern, build a record, and take action against actors who thought they were beyond the reach of state law.”⁵¹ At the time of this report’s publication, the case is pending.

On the same day as SAFE filed suit against Eagle Shows and JSD Supply, the Office also sued FSS Armory, a gun dealer in Morris County, NJ for unsafe firearm storage practices.⁵² Under New Jersey law, retail firearms dealers are required to secure their inventories overnight and keep firearms out of view where they cannot be easily accessed by would-be thieves.⁵³ Yet images available on FSS Armory’s website and online listings showed stacks of firearms placed within arm’s reach of a ground-floor window — a layout that broadcast the store’s vulnerabilities to anyone looking on the internet.⁵⁴

⁴⁷ State of New Jersey, Office of the Attorney General, “[JSD Supply/Eagle Shows Complaint](#),” December 12, 2023.

⁴⁸ Ibid.

⁴⁹ Ibid.

⁵⁰ New Jersey Office of the Attorney General, Dec. 11, 2023, press conference announcing new civil complaints against Pennsylvania Gun Show Company, Eagles Shows, and a New Jersey Gun Dealer Under NJ Public Nuisance Law.

⁵¹ Interview with Jeremy Ershow, November 13, 2025.

⁵² State of New Jersey, Office of the Attorney General, “[FSS Armory Complaint](#),” December 12, 2023.

⁵³ Ibid.

⁵⁴ Ibid.



Screenshot of FSS Armory's Entrance Doorway and Ground Floor Window, included in the NJ OAG's FSS Armory Complaint (pg. 2).

In early January 2023, a group of individuals searched for “gun stores in NJ” on a cellphone and found FSS Armory. They drove to the store in the middle of the night, smashed two glass windows, reached in, and stole 18 firearms. Within hours, the burglars used the stolen firearms in an armed robbery of a jewelry store. Of the 18 stolen firearms, nine have been recovered, all in connection with crimes.⁵⁵ One firearm was recovered in Newark from a man wanted in a domestic violence case; another turned up during a sweep of an illegal nightclub in Paterson. Additional firearms were intercepted during a New York Police Department operation targeting gun trafficking. Nine of the stolen firearms remain unaccounted for.⁵⁶

For SAFE, this was more than a case of burglary—it was evidence of how a firearms dealer’s negligence could contribute directly to harm in the community. The NJ AG’s complaint against FSS Armory alleged multiple counts of unlawful conduct including violations of the state’s longstanding safe storage requirements for licensed firearm dealers, as well as common law negligence.⁵⁷ In July 2025, FSS Armory settled the case, and agreed to:

- Secure all firearms and ammunition during non-business hours, storing inventory in compliance with state regulations and SAFE oversight.
- Install upgraded security systems, including real-time alarm capabilities on all exterior doors and windows.
- Install protective bars on all exterior windows to prevent unauthorized access.

⁵⁵ Ibid.

⁵⁶ Eric Blair, “[Unsecured Guns Stolen from NJ Armory Linked to Violent Crimes.](#)” Morristown Minute, July 14, 2025.

⁵⁷ State of New Jersey, Office of the Attorney General, “[FSS Armory Complaint.](#)” December 12, 2023.

- Submit to independent inspections, by a monitor agreed upon by both parties, every six months for four years to ensure ongoing compliance with the settlement terms.
- Pay a fine of \$125,000 to the State of New Jersey.⁵⁸

Senior Investigator Barlow reflected on how this case exemplified SAFE’s goal of public safety impact. “It’s not just about one burglary,” he observed. “It’s about the way that unsecured guns can quickly enter illegal markets and be used against people. That’s the real public safety harm we’re trying to prevent.”⁵⁹

2024: Taking on Illegal Ammunition Sales

One of the “reasonable controls” specified in the 2022 firearms industry accountability law requires sellers of firearm-related products in New Jersey to adopt safeguards to prevent sales to persons prohibited from possessing a firearm.⁶⁰ In the spring of 2024, SAFE investigators embarked on a series of undercover visits to firearms retailers across the state to assess their compliance with this requirement. Among them was Point Blank Guns and Ammo (Point Blank), a firearms dealer in East Hanover, NJ. In March and May 2024, Point Blank sold a Glock pistol magazine and a 1,000-round batch of .223 Remington ammunition to two undercover SAFE investigators for cash, without requesting any identification or assessing that the buyers were legally allowed to possess firearms. Senior Investigator Barlow explained, “We were able to purchase thousands of rounds of ammo at Point Blank...without showing ID and in violation of state law. We felt that made them strong candidates for enforcement action under the reasonable controls part of our [state] accountability law.”⁶¹

These undercover buys led SAFE to file a lawsuit in November 2024. The complaint alleged that Point Blank had violated the “reasonable controls” requirement of the state industry accountability law.⁶² In March 2025, after litigation commenced, Point Blank agreed to settle with the NJ AG’s office. Under the subsequent judicial consent order, Point Blank committed to adopting strict new protocols, including:

- Require valid New Jersey firearms identification or permit documentation before completing any sale of firearms-related products, including ammunition.
- Request government-issued photo ID when the permit offered lacked photographic verification.

⁵⁸ State of New Jersey, Office of the Attorney General, “[Consent Order and Final Judgement](#),” June 24, 2025.

⁵⁹ Interview with Eric Barlow, November 13, 2025.

⁶⁰ [NJ Rev Stat § 2C:58-35](#) (2022).

⁶¹ New Jersey Office of the Attorney General, November 13, 2024, press conference announcing a new civil complaint against Point Plan Guns and Ammo.

⁶² The State of New Jersey, Office of the Attorney General, “[Point Blank Guns and Ammo Complaint](#),” November 13, 2024. At the same time, SAFE also filed a parallel lawsuit against Butch’s Gun World, with similar facts as in the Point Blank case. In July 2025, a judge [granted](#) NJ’s motion for a summary judgment, with similar relief as obtained in the Point Blank settlement.

- Maintain detailed, three-year records of all firearms-related sales and how buyer eligibility was verified, with regular reporting to SAFE.
- Submit to monitoring from the NJ AG, upon request.
- Cover the state’s legal costs in bringing the enforcement action.⁶³

SAFE’s action served both to address Point Blank’s illegal conduct and to set an example for other federal firearms licensees in the state.

Reflecting on these first cases, Director Ramanathan and Deputy Director Ershow emphasized the SAFE Office’s commitment to identifying and enforcing firearms industry misconduct, in a way that drove behavior change. “We wanted to make those first cases as simple as possible for a court to understand,” Director Ramanathan recalled. “We also wanted to figure out a way to make gun dealers adopt safer practices, using the ‘reasonable controls’ provision of our [industry accountability] statute that nobody had really tried to enforce yet.”⁶⁴ The SAFE Office has noted behavior change among industry actors as a result of its lawsuits. For example, after New Jersey’s settlement with Point Blank, Palmetto State Armory, an online firearms retailer based in South Carolina, added a restriction to its website requiring ammunition purchasers shipping to New Jersey to upload a copy of their NJ Firearms identification card.⁶⁵

⁶³ State of New Jersey, Office of the Attorney General, “[Consent Order and Final Judgement](#),” March 13, 2025.

⁶⁴ Interview with Ravi Ramanathan, November 7, 2025.

⁶⁵ Palmetto State Armory, “[Shipping Restrictions by State.](#)” accessed January 13, 2026.

Building on Early Successes

BUILDING ON EARLY SUCCESSES

SAFE focused its initial cases on firearms industry actors with clear patterns of misconduct contributing directly to criminal diversion—licensed dealers with poor storage and sales practices and gun shows selling illegal products into the state. “We operate like any other civil investigative agency,” Director Ramanathan said. “Our early cases provided a playbook for how to pursue other industry misconduct.” With that foundation in place, SAFE began to investigate an even more consequential actor: firearms manufacturers.⁶⁶

“We operate like any other civil investigative agency,” Director Ramanathan said. “Our early cases provided a playbook for how to pursue other industry misconduct.”

The Public Safety Importance of Focusing on Manufacturers

SAFE’s move into manufacturer-level enforcement was a natural progression given that the largest industry actors can have outsized impact on public harm. Sitting at the top of the industry supply chain, manufacturers determine product design and features that affect how firearms perform in the hands of consumers and criminals alike. When a manufacturer’s design feature facilitates conversion to an illegal automatic weapon, for example, or increases the likelihood of unintentional discharge, the resulting public safety impact is felt nationwide. Addressing those upstream sources of harm is likely to produce the largest public safety gains.

Behavior change on the part of manufacturers can also alter industry practice more broadly. Litigation that results in injunctions, product fixes, or meaningful settlements from a manufacturer sends a signal to the whole market that illegal practices will be met with robust enforcement carrying significant costs. This drives the likelihood of proactive compliance with regulations across the industry.

It is no coincidence that accountability efforts against other harmful industries culminated in manufacturer-level action, including state AGs’ lawsuits against four major tobacco manufacturers (Philip Morris USA, R.J. Reynolds Tobacco Company, Brown & Williamson Tobacco Corporation, and Lorillard Tobacco Company) and several major opioid manufacturers (Johnson & Johnson, Purdue Pharma, and others).

There are also challenges that come with taking on these larger industry actors. The largest firearms manufacturers bring in hundreds of millions of dollars in revenue each year, with significant resources to defend against litigation. Pursuing manufacturers therefore required new investigative and legal strategies, coalition building, and a willingness to absorb and withstand forceful industry pushback. But this did not deter the SAFE team. “This team wasn’t going to sit on its heels,” AG Platkin said. “We were committed to building big cases that hold this industry accountable.”⁶⁷

⁶⁶ Ibid.

⁶⁷ Interview with Matthew Platkin, November 25, 2025.

Glock: Manufacturing “Handheld Machine Guns”

Glock is one of the best-known and best-selling handgun manufacturers in the world. Headquartered in Austria, Glock is a private company that does not release detailed sales figures; but estimates suggest that Glock sells over 1 million handguns in the US per year.⁶⁸ Glock firearms are also frequently recovered in connection to crime. According to ATF data from 2017-2021, the Glock 9mm pistol was the most traced crime gun in the US, accounting for over 129,000 traces (almost 7% of all crime guns recovered over the period).⁶⁹ According to law enforcement, one of the reasons why the Glock 9mm firearm is so popular among people committing gun crimes is because it can be easily used as, or “switched” into, a fully automatic weapon.⁷⁰

“Glock switches” are a type of machine-gun conversion device (MCD)—small pieces of metal or plastic that attach to the rear of Glock handguns. These switches—which are illegal to manufacture, possess, or transfer—hold down the trigger bar within the Glock handgun, allowing a user to fire continuously until all the ammunition is expended.⁷¹ Switched Glockes can fire 1,200 rounds per minute, which is faster than many fully automatic weapons used by the US military.⁷²



Demonstration of Glock switch functionality from the NJ SAFE Office.

⁶⁸ Gitnux, “[Firearms Industry Statistics 2025](#),” December 2025.

⁶⁹ ATF, “[National Firearms Commerce and Trafficking Assessment, Volume II](#),” February 2023.

⁷⁰ Mayors Against Illegal Guns and Everytown for Gun Safety, “[Mayors for Gun Industry Accountability](#),” September 2024.

⁷¹ FOX 4 Dallas-Fort Worth, “[ATF shows how a Glock Switch works](#),” June 2024.

⁷² Travis Pike, “[Glock Switches: A Full Breakdown](#),” *Pew Pew Tactical*, December 2025.

Glocks equipped with switches had been increasingly showing up at crime scenes.⁷³ In New Jersey, police across the state were recovering switched Glock machine guns in connection with homicides, aggravated assaults, and armed robberies. In November 2020, for example, Newark police officers found a 17-year-old victim killed by a gunshot to the head; the shooter was later found to be in possession of a switched Glock machine gun.⁷⁴

In March 2024, the City of Chicago became the first public entity to sue Glock regarding the “switch” problem, alleging that the company’s sale and marketing of handguns that can readily be converted into fully automatic machine guns created a serious public safety risk.⁷⁵ “That piqued our interest,” recalled Director Ramanathan, noting that the SAFE team was already examining Glock’s practices and was in communication with the Minnesota AG’s office, which had begun its own investigation. These inquiries uncovered evidence that Glock’s founder, Gaston Glock, was aware of the convertibility issue decades earlier. As early as 1988, Gaston Glock had developed a prototype of a Glock switch, and demonstrated it to a Venezuelan inventor, Jorge Leon, who later patented his own version of the device in 1998.⁷⁶ As the New Jersey complaint alleged, “Glock has known about its handguns’ intrinsic ability to function as handheld machine guns from near the inception of the G17 [in the 1980s]...Unsurprisingly, when Leon’s designs became public, it did not take long for aftermarket Glock switches to appear in the outside world, unleashing Glock handguns’ inherent machine gun capabilities.”⁷⁷ The complaint further alleged that Glock could have addressed this risk through relatively modest design changes, but chose not to do so for the US civilian market.⁷⁸

Based on these facts, New Jersey’s complaint asserted several interrelated causes of action under state law. At the core is a claim that Glock’s design choices contributed to a public nuisance by endangering public safety in New Jersey, the decision to manufacture that design was unreasonable under the circumstances, and violated New Jersey’s longstanding and strict prohibition against causing the manufacture of machine guns.⁷⁹ The complaint also incorporates claims under the New Jersey Product Liability Act, alleging that Glock pistols are defectively designed because their switchability was foreseeable and preventable. Together, these causes of action sought injunctive relief (including an order prohibiting Glock from selling readily switchable handguns to civilians in New Jersey) and financial remedies.

As of this report’s publication, the litigation is ongoing, but New Jersey has cleared a critical early

⁷³ ATF, “[National Firearms Commerce and Trafficking Assessment, Volume IV](#),” January 2025.

⁷⁴ The State of New Jersey, Office of the Attorney General, “[Glock Complaint](#),” December 12, 2024.

⁷⁵ Vernal Coleman, “[Federal Law Thwarted Chicago’s Attempt to Sue Gun-Makers. But Now It Has a New Strategy](#),” *ProPublica*, July 2024.

⁷⁶ The State of New Jersey, Office of the Attorney General, “[Glock Complaint](#),” December 12, 2024; Bill Hutchinson, “[‘I feel terrified’: Inventor of ‘Glock switch’ technology says he regrets creation](#),” *ABC News*, June 2024.

⁷⁷ The State of New Jersey, Office of the Attorney General, “[Glock Complaint](#),” December 12, 2024.

⁷⁸ *Ibid.*

⁷⁹ *Ibid.*

hurdle. In October 2025, a Superior Court in New Jersey denied Glock’s motion to dismiss the lawsuit, allowing the state’s core claims to proceed and positioning the SAFE Office to pursue discovery.⁸⁰ The denial of Glock’s motion to dismiss marked an important inflection point, signaling that the appropriate application of New Jersey law to a manufacturer can withstand legal challenges and proceed toward adjudication.

Sig Sauer: A Handgun Prone to Accidental Discharge

New Jersey’s second enforcement action against a major firearm manufacturer arose from reports of a handgun that was firing without anyone pulling the trigger. On February 28, 2022, Raymond Tillotson, an officer for the Howell Township Police Department, was attending a firearms training course at the NJ State Police Academy. Officer Tillotson was holstering his service weapon—a Sig Sauer P320 handgun—when the firearm went off without his pulling the trigger. The shot ripped through Officer Tillotson’s leg and lodged in his foot, requiring emergency medical attention.⁸¹ Officer Tillotson’s shooting was not an isolated incident, but part of a documented pattern of accidental discharges associated with the P320 handgun. Reporting by *The Trace* and *The Washington Post* uncovered over 100 incidents nationwide of Sig Sauer P320 handguns accidentally discharging between 2016-2023; though this number is likely a significant undercount, as many incidents have not received media coverage or resulted in litigation.⁸² “We started seeing these cases on the news, including cases here in New Jersey, and we started to ask questions,” said SAFE Office Staff Attorney Rynar. “And the more we lifted the hood, the more incidents we’ve been finding.”⁸³

The stories in New Jersey were numerous and devastating, including that of Detective Lieutenant Walter Imbert of the Orange Police Department, who was preparing to clean his Sig Sauer P320 in April 2023 when it accidentally fired, killing him instantly; or Detective Mark Cunard of the Camden County Prosecutor’s Office, who was shot in his thigh and knee while walking to his vehicle, his P320 in its holster. For some, the harm caused by accidental discharges was psychological in addition to physical. “We met this entire community of people who were depressed by the thought they’d done something wrong in handling their gun,” said Staff Attorney Arnow. “For years, they’d carried this like an anvil on their shoulders.”⁸⁴ It is no coincidence that many victims of accidental discharges in New Jersey have been law enforcement officers; according to SAFE Office Senior Investigator Eric Barlow, there are at least 96 police departments in the state that carry Sig Sauer P320 handguns and law enforcement officers typically carry their sidearm with a bullet in the chamber while on duty.⁸⁵

⁸⁰ Zach Blackburn, “[N.J. lawsuit against Glock to continue after judge strikes down effort to dismiss](#),” *New Jersey Globe*, October 2025.

⁸¹ The State of New Jersey, Office of the Attorney General, “[Sig Sauer Complaint](#),” October 16, 2025.

⁸² Champe Barton and Tom Jackman, “[One of America’s Favorite Handguns Is Allegedly Firing On Its Owners](#),” *The Trace*, April 2023.

⁸³ Interview with Zachary Rynar, November 14, 2025.

⁸⁴ Interview with Shira Arnow, November 17, 2025.

⁸⁵ Interview with Eric Barlow, November 13, 2025.

Like Glock, Sig Sauer is one of the largest firearms manufacturers in the world. Headquartered in New Hampshire, Sig Sauer manufactured over 1 million firearms in the US in 2023, according to ATF data.⁸⁶ Introduced in 2014, the P320 family of handguns is one of Sig Sauer’s most popular product lines, including models sold to civilian, law enforcement, and military users. Upon its introduction, the P320 relied exclusively on an internal safety mechanism, which is intended to automatically disengage when the user pulls the trigger. This differs from other handguns that are equipped with an additional external safety, such as a “thumb safety” that must be manually disengaged before the trigger can be pulled. Sig Sauer touted the lack of an external safety as a positive, claiming in product marketing, “the P320 has no external safety...to snag or hang up on the draw.” However, Sig Sauer quickly became aware of the potential for accidental discharges. In 2016 and 2017, Sig Sauer was attempting to win a contract to become the supplier of the standard issue handgun for the US Army. At that point, Sig Sauer was on clear notice that the Army’s drop testing, conducted as part of the procurement evaluation, had revealed that the P320 posed an unacceptable risk of accidentally firing.⁸⁷

While Sig Sauer updated its design for the US Army, the company continued to sell P320s without an external safety to civilian and law enforcement users. In August 2017, Sig Sauer offered a “voluntary upgrade,” allowing P320 users to ship in their civilian model P320 handguns, and have them upgraded in a way that more closely resembled the military models—with a thinner and lighter trigger, and a modified gun slide. However, the upgraded models still did not include a manual safety.⁸⁸ Nonetheless, Sig Sauer continued to market these models of P320 as “chosen by all branches of the US military,” despite the fact that the Army would only purchase the P320 with an external safety for its use. As cases of accidental discharge among civilian and law enforcement users began to mount, Sig Sauer continued to sell P320 models without an external safety, and to claim in marketing, “the P320 won’t fire unless you want it to.”⁸⁹

⁸⁶ Orchid Advisors, “[Top 30 Largest Firearm Manufacturers of 2023](#),” April 19, 2025.

⁸⁷ The State of New Jersey, Office of the Attorney General, “[Sig Sauer Complaint](#),” October 16, 2025.

⁸⁸ Sig Sauer, “[P320 Voluntary Upgrade Program](#),” accessed December 31, 2025.

⁸⁹ The State of New Jersey, Office of the Attorney General, “[Sig Sauer Complaint](#),” October 16, 2025.

SAFETY WITHOUT COMPROMISE

We've designed safety elements into every necessary feature on this pistol. From the trigger, to the striker and even the magazine, the P320 won't fire unless you want it to.



SAFETY WITHOUT COMPROMISE

We've designed safety elements into every necessary feature on this pistol. From the trigger, to the striker and even the magazine, the P320 won't fire unless you want it to.

Images of Sig Sauer marketing materials taken from NJ complaint.

New Jersey's complaint against Sig Sauer—which was brought jointly by SAFE and the New Jersey's Division of Consumer Affairs—alleged that the P320 is defectively designed, that the company's design and marketing practices constitute unreasonable conduct contributing to a public nuisance, and that the company's advertising and promotional materials violate the NJ Consumer Fraud Act by misleading purchasers about the P320's safety. The State is seeking several remedies, including a mandatory recall of P320 handguns in New Jersey, a prohibition on marketing P320 handguns as safe from unintended discharge, damages, and abatement of the nuisance at the defendant's expense.⁹⁰ At the time of this report's publication, the litigation is still pending.

⁹⁰ Ibid.

Leading a Growing Coalition of AGs



LEADING A GROWING COALITION OF AGs

As the SAFE Office continued to grow its work, it found itself in communication with other like-minded state AG offices committed to firearms industry accountability. In December 2024, NJ AG Platkin announced that he and 15 other state AGs had created the first-ever multistate coalition on firearms industry accountability.⁹¹ States formally joining this coalition represented a broad cross-section of the country, including: California, Colorado, Connecticut, Delaware, District of Columbia, Hawaii, Maine, Maryland, Massachusetts, Michigan, Minnesota, Nevada, New Jersey, Oregon, Rhode Island, and Vermont.⁹² The coalition “reflects a shared commitment to address gun violence as a national public health crisis,” the announcement read.⁹³ Coalition members and other allied states have ramped up inter-state coordination and collaboration to share knowledge and advance strategies that can curb unsafe firearms industry practices.

The idea for the coalition was born out of New Jersey and Minnesota’s joint work on the Glock litigation. As the SAFE Office began its investigation into Glock, it reached out to other state AG offices. Through a common interest agreement, New Jersey and Minnesota began sharing investigative work that would be of use to their respective actions. Additional conversations between the SAFE Office and other state AG staff illuminated the need for and interest in more structured channels for collaboration on firearms industry enforcement actions, especially in cases where the harms transcend state boundaries.

The coalition was announced alongside the simultaneous filings of New Jersey and Minnesota’s respective lawsuits against Glock. Since that announcement, the Maryland AG, together with the City of Baltimore, has also filed suit against Glock.⁹⁴ “This coalition brings together the SAFE Office’s like-minded counterparts,” said Director Ramanathan. “We communicate much more frequently than we used to, especially on affirmative firearms industry litigation.”⁹⁵

⁹¹ State of New Jersey, Office of the Attorney General, “[AG Platkin Steps Up Efforts to Combat Gun Violence Through Coalition with Other States](#),” December 12, 2024.

⁹² Ibid.

⁹³ Ibid.

⁹⁴ JT Moodee Lockman and Stephon Dingle, “[Maryland leaders sue gun manufacturer Glock alleging company contributed to gun violence crisis](#),” *CBS News*, February 12, 2025.

⁹⁵ Interview with Ravi Ramanathan, November 7, 2025.

Impact

IMPACT

The SAFE Office's enforcement work is already reshaping how negligent actors from the firearms industry are being held to account, how courts understand the industry's obligations under the law, and how firearms companies behave in the marketplace. Together, these legal, behavioral, and public safety impacts demonstrate the transformational potential of state AG-led accountability efforts, and align with historic lows of gun violence in New Jersey in 2025.⁹⁶

Shifting Legal Frameworks

A central contribution of the SAFE Office has been its success in reframing firearms industry accountability as a matter of ordinary product liability and corporate misconduct—a conceptual shift with major practical consequences.

For decades, the firearms industry has relied on a narrative that firearms are categorically distinct from other consumer products, and therefore insulated from the types of safety, quality control, and marketing regulations that govern every other sector. The SAFE Office has helped reposition firearms cases squarely within the mainstream of civil enforcement, framing firearms industry harms as the predictable result of defective products, deceptive marketing, and other unsafe business practices. This shift has been foundational: it has opened pathways for the courts to evaluate industry behavior using familiar legal frameworks, and it has made the once-daunting federal PLCAA statute far more navigable.

SAFE has successfully built cases that leverage different components of state law, including but not limited to New Jersey's new firearms industry accountability law. Some of these violations of state law fit squarely within PLCAA's predicate exception (which allows for liability in cases where a firearms industry actor has violated state law, including consumer protection laws and public nuisance laws); while others bypass PLCAA entirely because the defendants have no federal firearms license or because the claims are unrelated to criminal misuse.⁹⁷ In this way, SAFE's work demonstrates that PLCAA does not present a blanket barrier to enforcement. Over time, the SAFE Office has refined and strengthened these theories, contributing to a growing, national playbook for state AGs interested in holding the firearms industry accountable.

Firearms Industry Behavior Change

SAFE's enforcement efforts are intentionally designed to both stop individual bad actors and influence overall industry behaviors. The office's theory of change recognizes that meaningful improvements in public safety require sector-wide shifts in how firearms are designed, marketed, and sold, and that addressing industry misconduct will reduce firearm violence. Several of SAFE's early actions have already begun to yield results.

⁹⁶ PBS NJ Spotlight News, "[Gun Violence Declined to Historic Lows Across NJ in 2025.](#)" January 6, 2026.

⁹⁷ Charles N. Randall, "[\(As-\) Applying PLCAA's Predicate Applying PLCAA's Predicate Exception After National Shooting Sports Foundation, Inc. v. James, Harvard Law Review,](#)" November 24, 2025.

Most notably, the pressure from New Jersey’s litigation against Glock – along with other lawsuits from Minnesota, Maryland, and the City of Chicago and the City of Seattle– aligns with the company’s decision to add impediments to its new pistols for the US market.⁹⁸ Glock’s decision– which comes after years of denying any ability or responsibility to change–reflects the power of state-level enforcement to move even the largest and most resistant industry players toward safer products.

Additionally, SAFE’s cases against negligent firearms dealers are already driving improvements in retail compliance, both online (as in the Palmetto State Armory example above) and through the ongoing monitoring of FSS, Butch’s World, and Point Blank. These behavioral changes demonstrate that proactive enforcement can shift dealer norms and disrupt unsafe sales practices that divert firearms into illegal markets. “The lawsuits we brought against the firearms industry not only impact a particular defendant, but have changed how the entire industry behaves,” said AG Platkin. “The case against FSS Armory is a great example. We know that firearms industry members talk — a lot. And in the case of FSS Armory, we put the industry on notice that failing to properly secure their firearms could lead to significant legal liability. As a result, our understanding is now the industry in New Jersey is taking greater precaution with their firearms inventory, and that is precisely the positive impact on public safety we hope to achieve through these litigations.”⁹⁹

Ultimately, the SAFE Office will measure its success by creating a safer New Jersey with less gun violence. By building legal precedent, shifting industry incentives, and institutionalizing the state’s enforcement capacity, the SAFE Office is laying the groundwork for ripple effects that extend far beyond any individual case filing. The office’s long-term strategy aims to protect both current and future communities by reshaping the environment in which the gun industry operates—demanding safe business practices and holding violators accountable.

⁹⁸ Champe Barton, “[Facing Legal Pressure, Glock Revamps Pistols to Prevent Machine Gun Conversions.](#)” *The Trace*, November 24, 2025. Dan Zimmerman, “[No, GLOCK Didn’t Dump Its Proven, Reliable Design Because of California’s GLOCK Ban.](#)” *The Shooting Wire*, October 27, 2025. Jeremy Harris, [Seattle Sues Glock Over Illegal Devices That Modify Guns to Allow Automatic Firing](#), *KOMO News*, September 3, 2025.

⁹⁹ Interview with Matthew Platkin, November 25, 2025.

Challenges and Lessons Learned

CHALLENGES AND LESSONS LEARNED

The SAFE Office’s work to date has revealed the obstacles inherent in building a new model of civil enforcement for the firearms industry. These challenges—and the strategies the office developed to navigate them—offer lessons for jurisdictions seeking to replicate or expand this approach.

Strong Industry Resistance

Unlike other industries, the firearms industry has become accustomed to operating without meaningful scrutiny. “It’s a litigious industry,” said AG Platkin, “an industry not used to being held accountable. They’ve gotten used to that. Then we showed up.”¹⁰⁰ In response to New Jersey’s new firearms industry accountability law, industry actors responded aggressively. NSSF sued the state, claiming that New Jersey’s new law violated PLCAA and the US Constitution.¹⁰¹ “Many gun companies—from dealers to manufacturers—assume that PLCAA and the Second Amendment shield them from all liability,” said Staff Attorney Rynar. “This misconception fuels their refusal to accept our legitimacy.”¹⁰²

Despite this resistance, the SAFE Office has established itself as a serious and credible force for accountability, and not simply being anti-gun. It has successfully defended itself against the NSSF lawsuit; won settlements against firearms dealers Point Blank and FSS Armory for their misconduct; won a summary judgement against Butch’s World; and brought cases against large manufacturers for misconduct that have already changed product design. While resistance remains, many in the firearms community have also seen the value in the SAFE Office’s work. According to Senior Investigator Barlow, “I think Sig Sauer will bring about change...I have friends who are 2A people, but they see the value in the Sig Sauer case...somebody needs to be held accountable.”¹⁰³

Building Awareness

In its early months, SAFE confronted uncertainty—even within the New Jersey state government—about its mission, authority, and place within existing enforcement structures. Agency actors were unfamiliar with the concept of a civil firearms industry accountability office, leading to initial skepticism and hesitancy to engage. And SAFE’s opponents often mischaracterized its work as an effort to limit individual firearm ownership, making clear, consistent messaging essential to emphasize that the office targets industry misconduct—not lawful firearm users.

Filing SAFE’s first cases in December 2023 proved pivotal. “Our litigation crystallized the office’s identity as a dedicated accountability agency,” said Director Ramanathan, “and increased public visibility into systemic problems within the firearms industry.”¹⁰⁴ As SAFE began to demonstrate concrete results, its purpose became clearer across state agencies, law enforcement partners, and external stakeholders. SAFE Office staff also emphasized the importance of outreach to relevant partners and stakeholders, which can benefit from having staff connected to the agencies you need to work with (e.g. former law enforcement).

¹⁰⁰ Interview with Matthew Platkin, November 25, 2025.

¹⁰¹ Zach Shonfeld, [“Appeals Court Dismisses Challenge to NJ Gun Liability Law.”](#) *The Hill*, August 17, 2023.

¹⁰² Interview with Zachary Rynar, November 14, 2025.

¹⁰³ Interview with Eric Barlow, November 13, 2025.

¹⁰⁴ Interview with Ravi Ramanathan, November 7, 2025.

Access to Law Enforcement Data

Prior to 2003, government litigants suing firearms industry members sought to leverage crime gun trace data to identify problematic dealers (trace data is information collected by ATF that tracks a recovered firearm to the first retail purchaser and location of that purchase, among other pieces of information).¹⁰⁵ Since 2003, however, there have been restrictions placed by the US Congress on the disclosure and use of ATF trace data (known as Tiahrt).¹⁰⁶ SAFE thus “pivoted toward dealer misconduct cases where wrongdoing could be proven without restricted federal data,” said Senior Investigator Barlow, “We developed alternate investigative paths—such as credit-card record analysis, undercover buys, and other non-trace evidence—to build credible cases against negligent dealers.”¹⁰⁷

SAFE also encountered challenges in obtaining information from state and local law enforcement agencies. Investigations involving crime guns are managed within the criminal justice system, and many prosecutors and police departments had no established procedures for responding to civil information requests from the SAFE Office. This lack of formal protocols created bureaucratic delays and legal uncertainty. “Data, undercover work, and facts sit behind law enforcement processes,” Deputy Director Ershow noted, “Prosecutors and police did not at first know what to do with our civil information requests.”¹⁰⁸ To bridge this divide, SAFE developed protocols to standardize information sharing between their office and law enforcement. Support from AG Platkin helped to institutionalize law enforcement cooperation, as did SAFE’s Senior Investigators’ longstanding relationships with police and prosecutors.

Use of Consumer Protection Laws

SAFE’s experience underscores that affirmative enforcement need not depend solely on a state-specific firearms industry accountability statute (for example, the case against Sig Sauer, which includes violations of the state’s consumer fraud laws). While New Jersey’s law has been an important tool, SAFE leadership emphasized that existing consumer protection authority offers a parallel and potentially powerful pathway for addressing gun industry misconduct. “At its core, much of this conduct is deceptive, unfair, or unconscionable business practice,” noted Staff Attorney Rynar.¹⁰⁹ Framing firearms industry wrongdoing within traditional consumer protection principles helps situate gun manufacturers and dealers within the same regulatory framework as other industries—and reinforces that they are not entitled to special exemptions from generally applicable laws. For jurisdictions without a dedicated firearms accountability statute, this approach provides a viable entry point for enforcement. It also strengthens the broader legal theory that firearms companies, like all corporations operating in the marketplace, are subject to longstanding prohibitions against deceptive and dangerous business conduct.

¹⁰⁵ ATF, “[National Tracing Center](#),” accessed December 16, 2025. For more information on the value of gun trace data and other crime gun intelligence tools, see The Joyce Foundation, [Optimizing Crime Gun Intelligence](#), July 2024.

¹⁰⁶ Giffords Law Center, “[Tiahrt Amendments](#),” accessed December 16, 2025.

¹⁰⁷ Interview with Eric Barlow, November 13, 2025.

¹⁰⁸ Interview with Jeremy Ershow, November 7, 2025.

¹⁰⁹ Interview with Zachary Rynar, November 14, 2026.

Recommendations

RECOMMENDATIONS

Drawing on the SAFE Office’s experience, impact, and lessons learned, the recommendations below highlight the structural, operational, and strategic choices that proved most critical to the Office’s success. These recommendations are meant to guide any AG’s office aiming to pursue affirmative enforcement of the gun industry.

Create Internal Capacity Dedicated to Affirmative Gun Industry Enforcement Work

The SAFE Office has a clear and singular mandate—to pursue affirmative enforcement of gun industry wrongdoing. “Critical to our office’s success is that our team works only on affirmative cases, and only on the gun industry. If they needed to handle our defensive cases [challenges brought by the gun industry against state actions], it would be too easy to get pulled away from our mission,” said NJ AG Platkin.¹¹⁰ The office’s distinct mission helped drive SAFE’s disciplined approach. “From our clearly established goals, we mapped out a plan that would shine a light on misconduct, enforce financial and operational consequences, and incentivize safer business practices,” said Director Ramanathan.¹¹¹

Leverage the Resources of Outside Counsel

Where possible, state AG offices can rely on outside legal counsel (pro bono or otherwise) to expand capacity in complex and resource-intensive litigation involving the firearms industry. Lawyers with gun safety organizations bring specialized expertise in litigation against the gun industry. Lawyers with private firms may bring in additional expertise in product liability, corporate misconduct, and regulatory enforcement—along with additional litigation capacity—that is often difficult to maintain in-house. When strategically overseen by state lawyers, these external partnerships strengthen affirmative enforcement, accelerate case development, and enable AG offices to pursue impactful, precedent-setting firearms industry cases with limited resources.

Allocate Dedicated Funding

From the start, the SAFE Office had its own operating budget. Initially, those operating expenses were absorbed internally. Subsequently, they were included in legislative appropriations. This budget allocation ensured that the SAFE Office had protected resources to carry out its mandate, and enabled SAFE leadership to, as Director Ramanathan noted, “plan strategically, and hire and retain the right staff.”¹¹²

Build Teams with Varied Skills, Expertise, and Functions

SAFE Office staff include both lawyers and investigators, with backgrounds in both civil and criminal law. Both of SAFE’s investigators have worked as law enforcement officers, bringing their

¹¹⁰ Interview with Matthew Platkin, November 25, 2025.

¹¹¹ Interview with Ravi Ramanathan, November 7, 2025.

¹¹² Ibid.

expertise, credibility, and relationships to the office. “I serve as a connector between SAFE and other law enforcement agencies,” said Senior Investigator Barlow. “The police open up a little more with me when they learn my background.”¹¹³

Staff Attorney Rynar—with his civil litigation background—brought experience holding other industries accountable. “The main insight I’ve tried to bring is to not treat gun manufacturers as different from other corporations,” said Rynar.¹¹⁴ Criminal prosecutors bring experience in investigation and case development (specifically in relation to gun crimes). Staff Attorney Shira Arnow’s experience as a prosecutor helped to track down crucial evidence. “[Rynar] is able to predict a legal hurdle that we are going to face, and I am able to come up with the evidence we need to overcome it,” said Arnow.¹¹⁵

Invest in Developing Strong Relationships with Law Enforcement and Across State Agencies

Strong relationships with law enforcement and other state agencies has been essential for the SAFE Office’s effectiveness. These partners hold critical data, expertise, and on-the-ground insights that have strengthened SAFE’s investigations and enforcement actions. In SAFE’s litigation against Sig Sauer, many stories of accidental discharges arose from conversations with local law enforcement agencies. “I would ask if they knew of any stories that hadn’t made the news, and they would connect me with victims they knew about. It strengthened the case exponentially,” said Senior Investigator Barlow.¹¹⁶ These relationships also helped to build trust and credibility—especially in the early days of a new office. “We had to earn the trust of state agencies, and our outreach and the quality of our early output gave us the credibility we needed to cooperate well together,” said Director Ramanathan.¹¹⁷

Coordinate and Collaborate with Other State AG Offices

Coordinating with other AG offices helped strengthen the SAFE Office’s overall impact and reach. In the early days of SAFE office’s operations, conversations with peers enhanced the Safe office’s legal expertise and strategic focus. “We learned a lot about how to craft both dealer and manufacturer cases from our counterparts in Minnesota,” said Deputy Director Ershow.¹¹⁸ Subsequently, as the SAFE Office had success in its own cases, other state AGs’ offices have turned to them for brainstorming and opportunities to pursue joint action. “We know New Jersey has more dedicated resources to this than other offices,” said Director Ramanathan, “Our ability to coordinate with other offices is a way for us to share our legal expertise and perhaps make complex cases a little bit easier to navigate.”¹¹⁹

¹¹³ Interview with Eric Barlow, November 13, 2025.

¹¹⁴ Interview with Zachary Rynar, November 14, 2025.

¹¹⁵ Interview with Shira Arnow, November 17, 2025.

¹¹⁶ Interview with Eric Barlow, November 13, 2025.

¹¹⁷ Interview with Ravi Ramanathan, November 7, 2025.

¹¹⁸ Interview with Jeremy Ershow, November 7, 2025.

¹¹⁹ Interview with Ravi Ramanathan, November 7, 2025.

Conclusion



CONCLUSION

The work of the New Jersey SAFE Office demonstrates that meaningful firearms industry accountability can be achieved through affirmative civil enforcement. By strategically deploying existing legal tools, SAFE has produced concrete changes in industry behavior, disrupted dangerous supply channels, and reduced the risk of future harm to communities. Its successes to-date—achieved with a modest budget and a tightly focused mandate—challenge long-standing assumptions about firearms industry immunity and underscore the vital role state AGs can play in addressing gun violence at its corporate source. As states increasingly confront the limits of downstream interventions alone, the SAFE model offers a tested and scalable framework for shifting accountability upstream and making corporate responsibility the governing principle of firearms regulation. “I hope more jurisdictions recognize the return on investment here,” said AG Platkin. “A few lawyers and civil investigators and you can save hundreds of lives...I hope we see SAFE Offices in every jurisdiction across the country.”

Joyce is a nonpartisan, private foundation that invests in evidence-informed public policies and strategies to advance racial equity and economic mobility for the next generation in the Great Lakes region.

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