

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

PEOPLE OF THE STATE OF NEW YORK, by LETITIA JAMES, Attorney General of New York,

Plaintiff,

-against-

MEAN LLC d/b/a Mean Arms,

Defendant.

Index No. 2023-_____

SUMMONS

TO: MEAN LLC
Attn: David Lucas
7535 Highway 92
Woodstock, GA 30189

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer on the Plaintiff's attorney within 30 days after the service is complete. In the case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Plaintiff designates New York County as the place of trial. Venue is proper in New York County under CPLR § 505(a) because this action is brought by a public authority which maintains a principal office at 28 Liberty Street, New York, NY 10005, which is located within the County.

Dated: May 11, 2023
New York, New York

FOR THE PEOPLE OF THE STATE
OF NEW YORK

LETITIA JAMES
Attorney General

By:  _____

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COMPLAINT

Plaintiff, The People of the State of New York (the “State”), by Letitia James, Attorney General of New York, allege upon information and belief:

NATURE OF ACTION

1. To prepare for a racist mass murder on a predominantly Black community in Buffalo, New York, an 18-year old white male (the Buffalo shooter) in January 2022 purchased a Bushmaster XM-15, an AR-15-style semiautomatic rifle commonly used in mass shootings, with a pistol grip. The Buffalo shooter intended to use a weapon that could hold many rounds of ammunition and could also be reloaded quickly with detachable magazines. He chillingly observed there are very few weapons that are easier to use and more effective at killing than the Bushmaster XM-15 he planned to use.¹

¹ Semiautomatic rifles like the Bushmaster XM-15 can generally fire rounds at high velocity causing large cavities in human bodies, destroying tissues and organs. See N. Kirkpatrick, Atthar Mirza and Manuel Canales, *The Blast Effect: This is How Bullets from an AR-15 Blow the Body Apart*, Washington Post (Mar. 27, 2023), <https://www.washingtonpost.com/nation/interactive/2023/ar-15-damage-to-human-body/>.

2. The Bushmaster XM-15 the Buffalo shooter purchased came installed with an MA Lock, a \$19.99 fastener that MEAN LLC d/b/a Mean Arms (Mean Arms) claims will convert an illegal assault weapon in New York into a compliant weapon by locking a 10-round detachable magazine in place and preventing the rifle from accepting a detachable magazine.² However, the MA Lock did not effectively impede the ability of the Bushmaster XM-15 used by the Buffalo shooter to accept a detachable magazine.³ Using basic tools in his family's home and following easily available instructions, within a matter of minutes, the Buffalo shooter simply removed the MA Lock from the rifle.

3. On May 14, 2022, as he planned, the Buffalo shooter used the Bushmaster XM-15 to carry out a deadly attack at a Tops Friendly Markets supermarket. During the attack, the Buffalo shooter reloaded the rifle with 30-round detachable magazines, enabling him to keep shooting and preventing the victims from being able to escape or intervene. Ultimately, in approximately two minutes, the Buffalo shooter killed 10 people and injured three others, all of whom were merely doing their grocery shopping or working at the supermarket.

4. This action seeks to remedy (i) Mean Arms' deceptive and false advertising practices with respect to the marketing and sale of the MA Lock in New York; (ii) Mean Arms' aiding and abetting of the illegal possession of assault

² Mean Arms MA Lock Product Page, <https://www.meanarms.com/products/detail/ma-lock> (last visited Apr. 26, 2023); Mean Arms FAQs, available at <https://www.meanarms.com/faqs> (last visited Apr. 26, 2023).

³ Mean Arms MA Lock Product Page, <https://www.meanarms.com/products/detail/ma-lock> (last visited Apr. 26, 2023).

weapons in New York; and (iii) Mean Arms' conducting business in New York in violation of New York limited liability company law and other laws of New York.

JURISDICTION AND VENUE

5. This Court has jurisdiction pursuant to New York Constitution, Article VI, § 7(a), and New York Judiciary Law § 140-b. No claim or substantial question of federal law is alleged.

6. This Court also has jurisdiction over this proceeding pursuant to Executive Law § 63(12), which authorizes the Attorney General to commence an action for injunctive relief and other relief against any person or business entity that has engaged in or is engaging in repeated or persistent fraudulent or illegal acts in the conduct of business within New York.

7. Jurisdiction is proper under CPLR 302(a)(1) because Mean Arms conducts substantial business within New York and contracts to supply goods in New York.

8. Jurisdiction is also proper under CPLR 302(a)(3) because Mean Arms has committed one or more tortious acts outside New York that caused injury to persons or property within the State, and because Mean Arms (1) regularly solicits business in New York, (2) engages in persistent conduct towards New York consumers, (3) derives substantial revenue from goods used or consumed in New York, and (4) expects or should reasonably expect its sale of the MA Lock to have consequences in New York and derives substantial revenue from interstate commerce.

9. Venue is proper in New York County under CPLR § 505(a) because this action is brought by a public authority which maintains a principal office within the County.

PARTIES

10. Plaintiff, the People of the State of New York via New York State Attorney General Letitia James, brings this action in a sovereign capacity to protect the interests of the State and its citizens. This action is brought pursuant to the Attorney General's common-law and statutory authority including, *inter alia*, New York Executive Law § 63(12), New York General Business Law Article 22-A, and New York Limited Liability Company Law § 809.

11. Mean Arms is a Georgia limited liability company organized under the laws of Georgia with its principal place of business in Woodstock, Georgia.

LEGAL BACKGROUND

I. NEW YORK EXECUTIVE LAW § 63(12)

12. The Attorney General is authorized pursuant to New York Executive Law § 63(12) to bring an action to enjoin “repeated fraudulent or illegal acts” and “persistent fraud or illegality” in the “carrying on, conducting or transaction of business.”

13. “Illegal” conduct includes the violation of any state, federal, or local law or regulation. New York Executive Law § 63(12).

14. “Repeated” fraud or illegality includes the “repetition of any separate and distinct fraudulent or illegal act, or conduct which affects more than one

person,” and “persistent” fraud or illegality includes “continuance or carrying on of any fraudulent or illegal act or conduct.” New York Executive Law § 63(12).

15. The Attorney General is also authorized pursuant to New York Executive Law § 63(12) to bring an action to hold parties liable for aiding and abetting such wrongful conduct.

16. In addition to an order enjoining such activity, the Attorney General may seek restitution, disgorgement of ill-gotten gains, damages, and other relief. New York Executive Law § 63(12).

II. NEW YORK GENERAL BUSINESS LAW §§ 349 AND 350

17. Under New York General Business Law § 349(a), “[d]eceptive acts or practices in the conduct of any business, trade or commerce or in the furnishing of any service in this state” are unlawful.

18. Under New York General Business Law § 350, “[f]alse advertising in the conduct of any business, trade or commerce or in the furnishing of any service in this state” is unlawful.

19. The Attorney General may seek disgorgement of all income resulting from such illegal practice, restitution, and penalties of up to \$5,000 for each individual violation of Article 22-A of New York General Business Law. New York General Business Law §§ 349, 350-d.

III. NEW YORK’S ASSAULT WEAPON BAN

20. New York has enacted legislation targeted to prevent mass shootings.

21. New York Penal Law §§ 265.02(7) and 265.10 make it a felony to possess, manufacture, transport, or dispose of an “assault weapon.”

22. Under New York law, an assault weapon is defined to include certain semiautomatic firearms, including “a semiautomatic rifle that has an ability to accept a detachable magazine” and has at least one of the military-style features listed in New York Penal Law § 265.00(22)(a).⁴

23. Semiautomatic assault weapons have been understood to pose unusual risks, including more numerous wounds, more serious wounds, and more victims in shootings.

24. Semiautomatic assault weapons are disproportionately used in crime, and particularly in criminal mass shootings.

25. A detachable magazine is generally considered an ammunition feeding device that can be removed from a firearm.

26. Detachable magazines enable a shooter to quickly switch out a magazine to keep shooting without having to stop and reload a magazine affixed to a firearm.

27. New York Penal Law § 265.02(8) makes it a felony to possess a “large capacity ammunition feeding device.”

28. A large capacity ammunition feeding device is defined, in relevant part, as a “magazine . . . or similar device . . . that has a capacity of, or that can be

⁴ The military style features listed in New York Penal Law § 265.00(22)(a) consist of (i) a folding or telescoping stock; (ii) a pistol grip that protrudes conspicuously beneath the action of the weapon; (iii) a thumbhole stock; (iv) a second handgrip or a protruding grip that can be held by the non-trigger hand; (v) a bayonet mount; (vi) a flash suppressor, muzzle break, muzzle compensator, or threaded barrel designed to accommodate a flash suppressor, muzzle break, or muzzle compensator; and (vii) a grenade launcher. These military style features make weapons more deadly.

readily restored or converted to accept, more than ten rounds of ammunition[.]”
New York Penal Law § 265.00(23).

29. Large capacity ammunition feeding devices allow a shooter to keep firing many rounds before stopping to reload, increasing casualties and preventing victims from being able to escape or intervene.

30. Since 1980, large capacity ammunition feeding devices have played a role in at least 99 mass shootings nationwide, during which approximately 907 people were killed and 1,276 people were injured.⁵

31. For example, in 2012, a shooter, armed with a Bushmaster XM-15 and at least six 30-round magazines, in less than five minutes, murdered 20 children and six adults at Sandy Hook Elementary School in Newtown, Connecticut.

IV. NEW YORK LIMITED LIABILITY COMPANY LAW §§ 802 AND 809

32. Under New York Limited Liability Company Law § 802, a foreign limited liability company must apply for authority to do business in New York before doing business in the state.

33. New York Limited Liability Company Law § 809 authorizes the Attorney General to bring an action to restrain a foreign limited liability company without a certificate of authority from doing business in violation of the limited liability company law or other laws of New York.

⁵ Violence Policy Center, *Mass Shootings in the United States Involving Large Capacity Ammunition Magazines* (Apr. 17, 2023), https://vpc.org/fact_sht/VPCshootinglist.pdf.

FACTS

I. MEAN ARMS' DECEPTIVE AND FALSE ADVERTISING OF THE MA LOCK

34. Mean Arms states that it is a manufacturer that specializes in custom firearm development and product innovation.⁶

35. Mean Arms states that it develops in-house engineering solutions that range from complete firearms to custom-designed parts.⁷

36. Since 2017, Mean Arms has repeatedly and persistently sold and/or distributed the MA Lock to purchasers in New York via its website and/or third-party sellers.

37. The price to purchase an MA Lock from Mean Arms is \$19.99.⁸

38. Mean Arms describes the MA Lock as “a shear bolt mechanism designed to lock MIL-SPEC AR-15 and AR-10 magazines in place.”⁹

39. The AR-15 and AR-10 are military specification semiautomatic rifles that generally have the ability to accept a detachable magazine.

40. AR-15s and AR-10s generally range in cost from \$550 to \$2,500.

⁶ About Mean Arms, <https://www.meanarms.com/about> (last visited May 5, 2023).

⁷ *Id.*

⁸ Mean Arms MA Lock Product Page, <https://www.meanarms.com/products/detail/ma-lock> (last visited Apr. 26, 2023).

⁹ *Id.* “MIL-SPEC” refers to military specifications. The AR in AR-15 and AR-10 refers to “ArmaLite rifle.”

41. According to Mean Arms, the MA Lock is “[d]eveloped for states with intrusive laws requiring fixed magazines” and “installing the MA Lock makes AR firearms legal and compliant[.]”¹⁰

42. Mean Arms states that installation of the MA Lock “eliminat[es] the requirement to register your rifle with your local government.”¹¹

43. Mean Arms further states in an online tutorial posted on YouTube, dated March 29, 2017, that “with the installation of the MA Lock, your firearm is now compliant with fixed magazine legislation requirements.”¹²

44. Mean Arms further specifies that installation of the MA Lock “satisfies . . . N[ew York] state law” and that Mean Arms has “no issue shipping to customers in . . . [New York.]”¹³

45. Third-party seller Brownells sells the MA Lock to purchasers in New York for \$19.99.

46. Consistent with Mean Arms’ statements, Brownells’ website states that the MA Lock “is designed to fix magazines into place on today’s mil-spec AR-15 and AR .308 rifles, allowing owners to comply with state and local laws while keeping ownership of their guns.”¹⁴

¹⁰ *Id.*

¹¹ *Id.*

¹² Mean Arms MA Lock Installation Video, <https://www.youtube.com/watch?v=EjJdMfuH9q4> (last visited May 5, 2023).

¹³ Mean Arms FAQs, available at <https://www.meanarms.com/faqs> (last visited Apr. 26, 2023).

¹⁴ Brownells MA Lock Product Page, <https://www.brownells.com/gun-parts/rifle-parts/rifle-magazine-parts/ar-10ar-15-ma-lock/> (last visited May 5, 2023).

47. Third-party seller OpticsPlanet sells the MA Lock to purchasers in New York for \$29.89.

48. Consistent with Mean Arms' statements, OpticsPlanet's website states that the MA Lock is "[d]eveloped for states with intrusive laws requiring fixed magazines" and that "installing the MA-Lock makes AR rifles legal and compliant, leaving all your favorite tactical features in place."¹⁵

49. Consistent with Mean Arms' statements, OpticsPlanet's website further states that "[i]nstallation of the MA-Lock provides a true solution to fixed magazine laws, thus eliminating the requirement to register your rifle with your local government."¹⁶

50. Third-party seller Ammo Bros also sells the MA Lock to purchasers in New York for \$15.97.

51. Consistent with Mean Arms' statements, Ammo Bros' website states that the MA Lock is "designed to fix magazines into place on today's mil-spec AR-15 and AR .308 rifles, allowing owners to comply with state and local laws while keeping ownership of their guns."¹⁷

52. In order to make a rifle that otherwise may be an illegal assault weapon under New York law legal, the MA Lock must eliminate the semiautomatic rifle's ability to accept a detachable magazine.

¹⁵ OpticsPlanet MA Lock Product Page, <https://www.opticsplanet.com/mean-arms-california-compliant-ar-15-ar-10-fixed-magazine-catch-lock.html> (last visited May 5, 2023).

¹⁶ *Id.*

¹⁷ Ammo Bros MA Lock Product Page, <https://www.ammobros.com/mean-arms/-327274> (last visited May 5, 2023).

53. However, in actuality, the installation of an MA Lock does not eliminate a semiautomatic rifle's ability to accept a detachable magazine.

54. Mean Arms is well aware that the MA Lock is simple to remove.

55. In fact, the MA Lock is designed to be removed quickly, easily, and without damaging the semiautomatic rifle, with Mean Arms even providing removal instructions on the product label. *See* Section III *infra*.

56. Thus, Mean Arms is deceptively and falsely advertising to purchasers within New York, including via its website, YouTube, and third-party sellers, that installing an MA Lock on a semiautomatic rifle, that otherwise may be an illegal assault weapon under New York law, makes the weapon legal.

II. SIMPLE REMOVAL OF AN MA LOCK FACILITATES MASS MURDER AT TOPS SUPERMARKET IN BUFFALO, NEW YORK

57. The Buffalo shooter planned to use a firearm that could hold many rounds of ammunition without reloading, and could be reloaded quickly.

58. In January 2022, the Buffalo shooter purchased a Bushmaster XM-15, an AR-15-style "semiautomatic rifle that has an ability to accept a detachable magazine," New York Penal Law § 265.02(7), and a type of rifle that has been used in other mass shootings.

59. The Buffalo shooter observed that there are very few weapons that are easier to use and more effective at killing than the Bushmaster XM-15 he planned to use.

60. Although the Bushmaster XM-15 the Buffalo shooter purchased had an MA Lock installed and a 10-round magazine, the rifle itself retained the ability to accept a detachable magazine.

61. The Buffalo shooter easily removed the MA Lock from the Bushmaster XM-15 within a few minutes using a #2 speed out drill bit, as recommended by Mean Arms, and a power drill readily available in his family home.

62. During the attack, the Buffalo shooter inserted multiple 30-round detachable magazines to the Bushmaster XM-15 that also had a pistol grip, so that he did not have to reload frequently and when he did reload, he could do so quickly, adding to the deadliness of the attack.

III. MEAN ARMS KNOWS THAT INSTALLATION OF AN MA LOCK DOES NOT REMOVE A SEMIAUTOMATIC RIFLE'S ABILITY TO ACCEPT A DETACHABLE MAGAZINE

63. Mean Arms has repeatedly and persistently sold MA Locks to purchasers within New York since at least 2017.

64. Since 2017, Mean Arms has sold the MA Lock into New York knowing, intending, or being willfully blind to the fact that the installation or removal of the MA Lock on a semiautomatic rifle does not remove a rifle's ability to accept a detachable magazine, or otherwise alter the rifle in any meaningful way.

65. In fact, Mean Arms designed the MA Lock to be easily removable.¹⁸

¹⁸ Mean Arms FAQs, available at <https://www.meanarms.com/faqs> (last visited Apr. 26, 2023).

66. According to Mean Arms, a selling point of the MA Lock is that the MA Lock is “removable” and that removal of the MA Lock “will in no way harm your rifle.”¹⁹

67. Mean Arms also provides specific instructions on how readily to remove an MA Lock on the back of its product packaging. Those instructions state as follows:

Removal Instructions:

1. Make sure the firearm chamber is CLEAR, UNLOADED and POINTED IN A SAFE DIRECTION!
2. Use any brand of screw extractor from your local hardware store (some brands may work better than others. We prefer a #2 Speed out).
3. To remove the threaded portion of the shear nut left in the MA LOCK sleeve, place the screw extractor into the center of the threaded portion of the shear nut and remove counter clockwise (Please refer to the screw extractor’s instructions for best use).
4. Now you may remove the MA LOCK SLEEVE.

68. Mean Arms has been well aware from the time it began selling the MA Lock in 2017 that the MA Lock is “[a]bsolutely” removable.²⁰

69. Other instructions on how to simply remove the MA Lock are also readily available online.

70. Mean Arms’ conduct has resulted in people in New York possessing semiautomatic rifles with MA Locks.

¹⁹ *Id.*

²⁰ Mean Arms Facebook Post (Mar. 29, 2017), <https://www.facebook.com/watch/?v=1021724514594396> (last visited May 5, 2023).

71. Even with the installation of an MA Lock, a semiautomatic rifle retains the ability to accept a detachable magazine once the MA Lock is removed per Mean Arms' or other readily available instructions.

72. Mean Arms' conduct has and is aiding and abetting the illegal possession of assault weapons in New York under New York Penal Law § 265.02(7).

**AS AND FOR A FIRST CAUSE OF ACTION
Repeated and Persistent Illegality in
Violation of New York Executive Law § 63(12)**

73. The State realleges each and every allegation in the paragraphs above as though fully set forth herein.

74. New York Executive Law § 63(12) authorizes the Attorney General to seek injunctive and other relief when any person engages in repeated or persistent illegal conduct in the carrying on, conducting, or transaction of business.

75. As set forth above, since 2017, Mean Arms has engaged in repeated or persistent illegal conduct in the carrying on, conducting, or transacting of business, by *inter alia*:

- *Deceptive Business Practices*: Mean Arms has repeatedly engaged in acts and practices in the conduct of business, trade, or commerce, including, but not limited to, misrepresenting, directly or by implication, in their advertising and elsewhere that installing an MA Lock on a rifle that otherwise may be an illegal assault weapon under New York law makes the weapon legal. Mean Arms thereby engaged in deceptive acts and practices in the conduct of any business, trade, or commerce in the State of New York in violation of New York General Business Law § 349(c). The Attorney General timely provided Mean Arms with the pre-litigation notice required by New York General Business Law § 349(c).
- *False Advertising*: Mean Arms has repeatedly engaged in acts and practices in the conduct of business, trade, or commerce, including, but not limited to, misrepresenting, directly or by implication, in their

advertising and elsewhere that installing an MA Lock on a rifle that otherwise may be an illegal assault weapon under New York law makes the weapon legal. Mean Arms thereby engaged in false advertising in the conduct of any business, trade or commerce or in the furnishing of any service in the State of New York in violation of New York General Business Law § 350. The Attorney General timely provided Mean Arms with the pre-litigation notice required by New York General Business Law § 349(c).

- *Aiding and Abetting Possession of Assault Weapons*: Mean Arms sells the MA Lock into New York knowing, intending, or being willfully blind to the fact that the installation of the MA Lock does not remove a semiautomatic rifle's ability to accept a detachable magazine. Mean Arms thereby aided and abetted the illegal possession of assault weapons in New York under New York Penal Law § 265.02(7).

76. By reason of the foregoing, Mean Arms has engaged in repeated and persistent illegal conduct in violation of New York Executive Law § 63(12).

**AS AND FOR A SECOND CAUSE OF ACTION
Violation of New York General Business Law § 349**

77. The State realleges each and every allegation in the paragraphs above as though fully set forth herein.

78. New York General Business Law Article 22-A, § 349 prohibits deceptive acts and practices in the conduct of any business, trade, or commerce in the State of New York.

79. As set forth above, Mean Arms has violated New York General Business Law § 349 by engaging in acts and practices, including, but not limited to, misrepresenting, directly or by implication, in their advertising and elsewhere that installing an MA Lock on a rifle that otherwise may be an illegal assault weapon under New York law makes the weapon legal.

80. The Attorney General timely provided Mean Arms with the pre-litigation notice required by New York General Business Law § 349(c).

**AS FOR A THIRD CAUSE OF ACTION
Violation of New York General Business Law § 350**

81. The State realleges each and every allegation in the paragraphs above as though fully set forth herein.

82. New York General Business Law Article 22-A, § 350 prohibits false advertising in the conduct of any business, trade, or commerce or in the furnishing of any service in the State of New York.

83. As set forth above, Mean Arms has violated New York General Business Law § 350 by engaging in acts and practices, including, but not limited to, misrepresenting, directly or by implication, in their advertising and elsewhere that installing an MA Lock on a rifle that otherwise may be an illegal assault weapon under New York law makes the weapon legal.

84. The Attorney General timely provided Mean Arms with the pre-litigation notice required by New York General Business Law § 349(c).

**AS FOR A FOURTH CAUSE OF ACTION
Violation of New York Limited Liability Company Law § 802
and Other New York Laws**

85. The State realleges each and every allegation in the paragraphs above as though fully set forth herein.

86. Mean Arms is a foreign limited liability company without a certificate of authority to do business in New York.

87. New York Limited Liability Company Law § 809 authorizes the Attorney General to bring an action to restrain a foreign limited liability company without a certificate of authority from doing business in violation of the limited liability company law or other laws of New York.

88. Mean Arms violated New York Limited Liability Company Law § 802 by failing to apply for authority to do business in New York before doing business in New York.

89. Also, as discussed above, Mean Arms is doing business in violation of other laws of New York, including, but not limited to New York Executive Law § 63(12), New York General Business Law § 349, and New York General Business Law § 350.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, the People of the State of New York, respectfully requests that the Court enter an order and judgment that:

1. Enjoins Mean Arms, pursuant to New York Executive Law § 63(12), from selling, shipping, distributing, or otherwise supplying the MA Lock to any person or entity in New York;
2. Directs Mean Arms, pursuant to New York Executive Law § 63(12), to issue public corrective statements regarding their false and misleading public statements and omissions;
3. Directs Mean Arms, pursuant to New York Executive Law § 63(12), to:

- a. Pay restitution and damages for its illegal practices that violated New York Executive Law § 63(12) and caused compensable injuries to the State or any other person; and
 - b. Disgorge all revenues it wrongfully obtained as a result of its illegal practices in violation of New York Executive Law § 63(12);
4. Grant civil penalties pursuant to New York General Business Law § 350-d, which provides for a penalty of up to \$5,000 for each violation of New York General Business Law § 349 and 350;
 5. Enjoins Mean Arms, pursuant to New York Limited Liability Company Law § 809, from doing any business within New York;
 6. Awards the State its costs and grant statutory costs pursuant to CPLR § 8303(a)(6); and
 7. Grants such other and further relief as the Court deems just and proper.

Dated: May 11, 2023
New York, New York

FOR THE PEOPLE OF THE STATE
OF NEW YORK

LETITIA JAMES
Attorney General

By: 

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