

# **CFH FAV SB334-Criminal Law - Firearm Crimes - Mach**

Uploaded by: Adam Rosenberg

Position: FAV



Date: February 5, 2026

To: Judicial Proceedings Committee

**Position: Favorable**

Reference: SB334-Criminal Law - Firearm Crimes - Machine Gun Convertible Pistols

Dear Chair Smith and Committee Members,

Thank you for the opportunity to provide testimony in strong support of SB 334. LifeBridge Health and the Center for Hope support SB 334 because firearm-related injury and death are major public health issues in Maryland and across the United States, and this legislation represents a meaningful step toward preventing needless harm.

Gun violence is a public health crisis, every day in America, hundreds of people are killed or wounded by firearms; nationally, gun violence remains the leading cause of death for children and adolescents and is a top cause of death and injury for all. Nearly 130 Americans are killed with guns each day and more than 200 are shot and wounded — devastation that permeates families and communities. Research shows that stronger gun safety policies are associated with fewer gun deaths overall.

We have seen historic drops in the number of homicides in Baltimore and the number of gunshot wound admissions at our own Sinai Hospital's Level II trauma center. Efforts including our own Safe Streets community violence intervention team and our Hospital Violence Responders have saved dozens of lives and prevented death and injury. Nevertheless, despite these decreases, we must continue to strive for zero deaths by firearm.

We must look to further reduce fatalities by preventing the ability of existing guns to become machine gun convertible that are capable discharging 50 rounds in four seconds with a single trigger pull (<https://www.atf.gov/news/press-releases/us-attorney-and-atf-release-new-public-service-announcement-warning-against-possession>). Aftermarket devices such as these reduce the ability of the shooter to aim and become indiscriminate weapons of mass death. They serve no purpose in Maryland other than to needlessly create more death.

SB 334 strengthens prevention by addressing weapon lethality and access with a focus on convertible guns — firearms that can be transformed from semiautomatic to fully automatic by the simple addition of a device — reflect an understanding that limiting the ease with which weapons can be made more lethal supports violence prevention. These highly modifiable firearms have been implicated in violent crime in Maryland, prompting lawsuits from state and local officials who argue that such conversions significantly exacerbate public safety risks.

Indeed, readily convertible guns, including devices like “Glock switches” or auto sears, can dramatically increase the rate of fire and lethality of a firearm. When such enhancements are inexpensive and untraceable, they especially endanger communities already grappling with high levels of violence by increasing the speed and volume of gunfire in criminal conflicts.



By reducing the circulation of weapons that can so easily be transformed into rapid-fire instruments of violence — while preserving lawful, regulated ownership — SB 334 helps diminish opportunities for mass casualties, drive down homicides, and remove vectors of harm from the street. This approach is consistent with evidence showing that common-sense firearm safety laws are associated with lower gun death rates. ([Everytown Research & Policy](#))

If we are to reduce our homicide rate and injury from firearms to zero, we need to elevate public safety and public health strategies. The public health approach to firearm violence — embraced by Maryland’s own health department, community groups, academic researchers, and federal health officials — recognizes that prevention must address both underlying risk factors and the physical tools that make violence more lethal. SB 334 aligns with this framework by supporting both behavioral and structural prevention.

LifeBridge Health and the Center for Hope respectfully urge a favorable report on SB 334. This bill supports evidence-based prevention, acknowledges gun violence as a health crisis, and creates pathways to reduce injuries and deaths — particularly among communities disproportionately impacted by firearm violence.

Thank you for your consideration on this critical legislation.

Adam Rosenberg, Esq.  
Executive Director, Center for Hope  
Vice President, Violence Intervention & Prevention, LifeBridge Health  
[arosenberg@lifebridgedhealth.org](mailto:arosenberg@lifebridgedhealth.org)  
Phone: 410-469-4654

# **SB0334\_Criminal\_Law\_-\_Firearm\_Crimes\_-\_Machine\_Gun**

Uploaded by: Cecilia Plante

Position: FAV



## TESTIMONY FOR SB0334

### Criminal Law – Firearm Crimes – Machine Gun Convertible Pistols

**Bill Sponsor:** Senator Love

**Committee:** Senate Judicial Proceedings

**Organization Submitting:** Maryland Legislative Coalition

**Person Submitting:** Aileen Alex, Cochair

**Position:** FAVORABLE

Chair, Vice Chair, and Members of the Committee,

I am submitting this testimony in support of SB0334 on behalf of the Maryland Legislative Coalition. We are an association of unpaid citizen advocates—individuals and grassroots groups in every district across the state—representing and supporting more than 30,000 Marylanders.

SB0334 addresses a growing public safety threat by prohibiting the manufacture, sale, purchase, or transfer of pistols that can be converted into machine guns. These conversion-ready weapons have become increasingly common, and they pose serious risks to communities and to the law enforcement officers who respond to emergencies every day. Closing this loophole is an important and overdue step toward reducing gun violence in Maryland.

I also want to speak personally. As a new grandmother, I feel the stakes of our public safety decisions more sharply than ever. I don't want my grandchild to grow up in a Maryland where fully automatic fire can be caused by a small, easily modified pistol on a neighborhood street or school. SB0334 is a practical, targeted measure that helps keep Marylanders safe while maintaining clear, enforceable standards. It is exactly the kind of thoughtful policy that protects families without burdening responsible gun owners.

This bill aligns directly with the Maryland Legislative Coalition's mission to support legislation that strengthens public safety, reduces harm, and improves the lives of Marylanders. Preventing the spread of machine-gun-convertible pistols is a commonsense step that supports safer communities and a more secure future for our children and grandchildren. We respectfully urge a **FAVORABLE** report on SB0334.

# **SB334**

Uploaded by: Charles Jarrett

Position: FAV

SB334 looks to prohibit the sale of certain semi-automatic pistols that, by virtue of their design and operating mechanisms, are “readily converted by hand to or by using common household tools into a machine gun by the installation of [an inexpensive and readily available] pistol converter.” SB334 refers to these semi-automatic pistols as “machine gun convertible pistols.”

The legislation provides that on or after January 1, 2027, subject to several exemptions allowing the continued use and sale of machine gun convertible pistols, principally by or to law enforcement personnel, no person may manufacture, sell, offer for sale, purchase, receive or transfer a machine gun convertible pistol. There is no mandated surrender or relinquishment of currently owned machine gun convertible pistols.

The bill also defines the term “pistol converter” as a device when “installed or attached to the rear of the slide of a semi-automatic pistol . . . interferes with the trigger mechanism, which enables the pistol to shoot automatically more than one shot by single function of the trigger.” SB334 adds pistol converters to current law’s definition of “rapid fire activators” that include bump stocks and switch/auto-sears. As the Committee may recall, switch/auto-sears are banned in Maryland as a result of legislation adopted during the 2024 Legislative session.

SB334 is a logical and prudent step in prohibiting the sale of firearms that are readily convertible to operate as rapid fire machine guns. Though the manufacturers of these handguns may not have foreseen or intended the misuse of their products, the relative ease with which these semi-automatic pistols can now be modified to operate as machine guns supports, if not compels, the adoption of the prohibition against the continued sale or transfer of “machine gun convertible pistols.”

It is noteworthy that the Supreme Court’s decision invalidating BATF’s ban on bump stocks, *Garland v. Cargill* (2024), turned on its statutory analysis that the National Firearms Act did not authorize BATF to regulate bump stocks as machine guns. Recall BATF’s bump stock rule was adopted in response to the 2017 tragic mass shooting at the Mandalay Bay Hotel in Las Vegas. Bump stocks remain prohibited under Maryland law. SB334 provides the statutory basis for banning semi-automatic pistols that can be easily transformed into continuous, rapid fire machine guns and thereby mitigate the dangers posed by such machine gun convertible pistols.

Accordingly, I urge the Committee to vote in favor of SB334 and work for its enactment into law.

Respectfully submitted,

Charles Douglas Jarrett  
Ellicott City, Maryland

# **Support SB 334- Convertible Pistols - Deborah Latt**

Uploaded by: Deborah Lattimer, MSSW, MPH

Position: FAV



## Unitarian Universalist Legislative Ministry of Maryland

### Testimony Support - SB 334 - Criminal Law - Firearm Crimes - Convertible Pistols

To: Senator Will Smith, Jr., Chair and  
Members of the Judicial Proceedings Committee  
From: Deborah Lattimer, MSSW, MPH, Lead Advocate, Gun Violence Prevention  
Unitarian Universalist Legislative Ministry of Maryland.  
Date: February 5, 2025

Unitarians Universalists recognize the inherent danger of firearms that are convertible to machine guns. We have a moral obligation and responsibility to uphold the law that machine guns are unlawful for citizens to own. ATF data shows that recoveries of machine gun conversion devices, including switches, increased by 784% from 2019 to 2023 alone. These converted handguns are capable of firing 20 rounds per second.

Manufacturers of certain pistols know that their firearms are easily converted into machine guns. These manufacturers have refused to alter the design of these firearms sufficiently to prevent their conversion into machine guns.

**SB 334** prohibits the sale of new handguns that can be easily converted into fully automatic machine guns using illegal devices known as switches. It holds manufacturers to a basic safety standard: If you want to sell in Maryland, your pistol cannot be designed to accept a switch. It follows the model recently enacted in California, proving this approach is both achievable and effective.

We urge you for a **favorable vote on Senate Bill 334**. We ask you to stand on the side of love and justice. We believe that these provisions will strengthen public safety in Maryland.

We urge a favorable report,

Thank you  
*Deborah A. Lattimer*

UULM-MD Lead Advocate for Gun Violence Prevention

# **GIFFORDS Support of SB334.pdf**

Uploaded by: Erin Earp

Position: FAV

**February 3, 2026**

Judiciary Proceedings Committee  
Maryland Senate  
2 East Miller Senate Office Building  
Annapolis, Maryland 21401

**RE: Support for SB 334**

Dear Chair Smith,

On behalf of GIFFORDS, the gun violence prevention organization led by former Congresswoman, gun owner, and gun violence survivor Gabby Giffords, **I am writing to express our strong support for SB 334.** The bill will protect Marylanders from DIY machine guns by prohibiting the future sale of any pistol that can quickly and easily be converted into a machine gun by attaching an auto sear.

DIY machine guns are a growing threat to public safety. Fully automatic machine guns have been illegal under federal and state law for decades. Still, they can be made at home by attaching a cheap, Lego-sized piece of plastic or metal to a convertible pistol. In Maryland and across the country, communities are being endangered by pistols that have been illegally converted into fully automatic machine guns.

Despite being illegal, these devices have become pervasive in recent years with the help of online marketplaces and the rise of 3D printing technology. Many are produced in Russia and China, smuggled into the United States, and sold for around \$20. ATF's most recent data shows a **784% increase** in auto sears recovered by the agency between 2019 and 2023. Firearms equipped with these devices accounted for nearly 13% (11,088) of all privately made firearms (88,425) recovered and traced by the ATF between 2019 and 2023.

Pistols converted into DIY machine guns are extremely dangerous because they can fire up to 1,200 rounds per minute. Their recoil also makes them hard to control and shoot accurately. Shootings committed with these modified pistols can be deadlier because they allow shooters to spray bullets with a single pull of the trigger, endangering bystanders. This is an issue that sometimes benefits from viewing. We recommend that the committee demonstrate the firing difference between a normal semiautomatic pistol and one equipped with a Glock switch.<sup>1</sup>

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<sup>1</sup> WXYZ-TV Detroit Channel 7 did a story that includes trained Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) agents demonstrating the difference between a semi-automatic firing rate and one

Although Maryland law prohibits the devices used to convert pistols, it is time for Maryland law to also hold gun manufacturers responsible for producing products that are easily convertible into machine guns. **SB 334 is vital legislation to curb the sale of pistols that can be turned into homemade machine guns with no more than a screwdriver and a \$25 piece of plastic or metal.** This bill will protect Marylanders from DIY machine guns by prohibiting firearms dealers from selling pistols to the general public that can be converted into machine guns solely by attaching an auto sear. Enacting this law would make it clear to manufacturers of easily converted handguns that they must modify their products if they want to sell them in Maryland.

Sincerely,

*Erin Earp*

Senior Policy Attorney  
GIFFORDS

# Support SB 334.pdf

Uploaded by: Erin Murphy

Position: FAV



**Brandon M. Scott**  
Mayor



**Richard J. Worley**  
Police Commissioner

## BALTIMORE POLICE DEPARTMENT

February 3, 2026

TO: The Honorable Members of the Judicial Proceedings Committee

FROM: Erin Murphy, Esq., Chief of Staff & Government Affairs, Baltimore Police Department

RE: Senate Bill 334- Criminal Law- Firearm Crimes- Machine Gun Convertible Pistols

DATE: February 5, 2026

### **Position: SUPPORT**

Chair Smith, Vice Chair Waldstreicher, and members of the Committee: Please be advised that the Baltimore City Police Department supports Senate Bill 334. This legislation requires all pistols sold in Maryland to be designed in a way that ensures they cannot be quickly and easily turned into machine guns. The Baltimore Police Department confiscated 47 modified guns in 2025 and 4 so far already this year.

The danger posed by a firearm modified in this manner is difficult to overstate. Once the trigger is depressed on such a weapon, the firing sequence cannot be terminated. The firearm will continue to fire, sometimes at a rate of up to 1,200 rounds per minute, until there is no more ammunition. The Baltimore Police Department has identified the use of firearms modified with Glock switches by drug trafficking organizations as a significant and ongoing public safety threat in Baltimore. These illegally modified weapons are used to intimidate communities and facilitate acts of serious violence.

In April 2025, the Baltimore Police Department, in coordination with the Drug Enforcement Administration, dismantled a major drug trafficking organization operating in the Curtis Bay area. As a result of this investigation, nine handguns were seized, including three Glock pistols that had been illegally modified with Glock switches, converting the firearms from semi-automatic handguns into fully automatic machine guns. Absent this coordinated enforcement action, these weapons posed a substantial risk of causing a mass-shooting incident within seconds.

In October 2023, Baltimore Police responded to a mass-shooting incident at Morgan State University during a Homecoming event. Five individuals sustained non-fatal gunshot wounds. The firearm used by a 17-year-old suspect in the incident had been modified with a Glock switch. The rate of fire resulted in shattered windows in a student residence hall, demonstrating the heightened lethality and indiscriminate danger posed by these illegally modified weapons and the significant potential for additional injuries or loss of life.

These instances demonstrate the importance of this legislation. The Baltimore Police Department requests a favorable report for SB 334.

# **Gregory-Lickenbrock-testimony-SB0334.pdf**

Uploaded by: Greg Lickenbrock

Position: FAV

Chair Smith and Members of the Senate Judicial Proceedings Committee:

Thank you for the opportunity to testify today in support of this legislation. My name is Greg Lickenbrock, and I am the Senior Firearms Analyst for Everytown for Gun Safety. Before joining Everytown, I spent a decade working in the gun industry as a magazine editor. I tested hundreds of firearms, attended media events and training courses, and met people working at every level of the firearms industry. I've also worked extensively with Glock and its products.

Federal and state law prohibit civilians from owning machine guns and the parts used to create them. But “switches” have made it extremely easy for people to convert Glock-style pistols into machine guns that can fire 20 rounds per second. These switches are tiny, easy to 3D print, and difficult for police to detect and intercept.

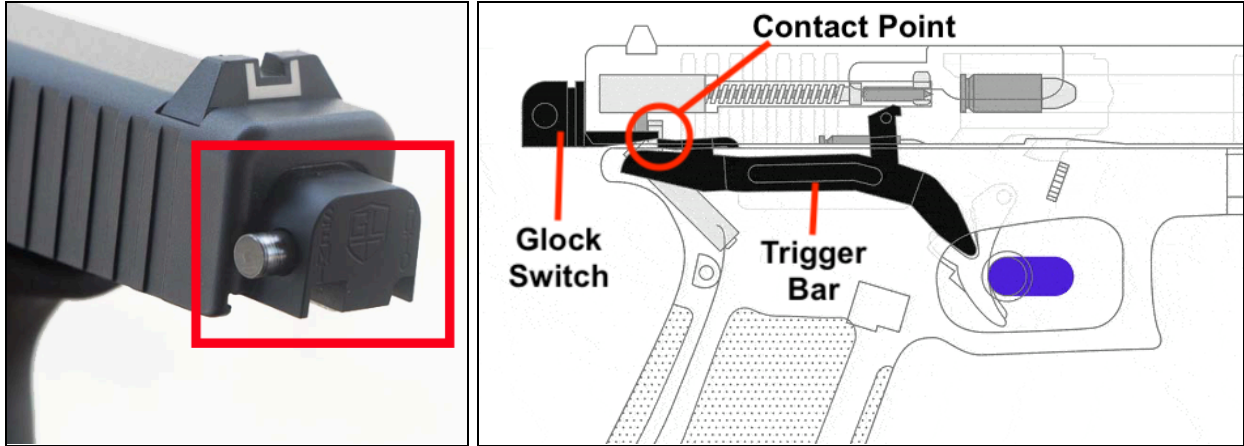
Glock-style pistols are uniquely easy to convert with switches — it takes less than a minute to install one — because they use cross-shaped (or “cruciform”) trigger bars that provide surface area for a switch to contact. Each time the gun's slide returns forward, the switch hits the trigger bar and pushes it downward, causing the gun to fire. As long as the shooter depresses the trigger and the gun has ammunition, it will continue firing.

This kind of rapid fire has already devastated many communities, as guns with switches have been used in at least 20 mass shootings across the U.S., and they've also been recovered all over Maryland in connection with criminal activity.

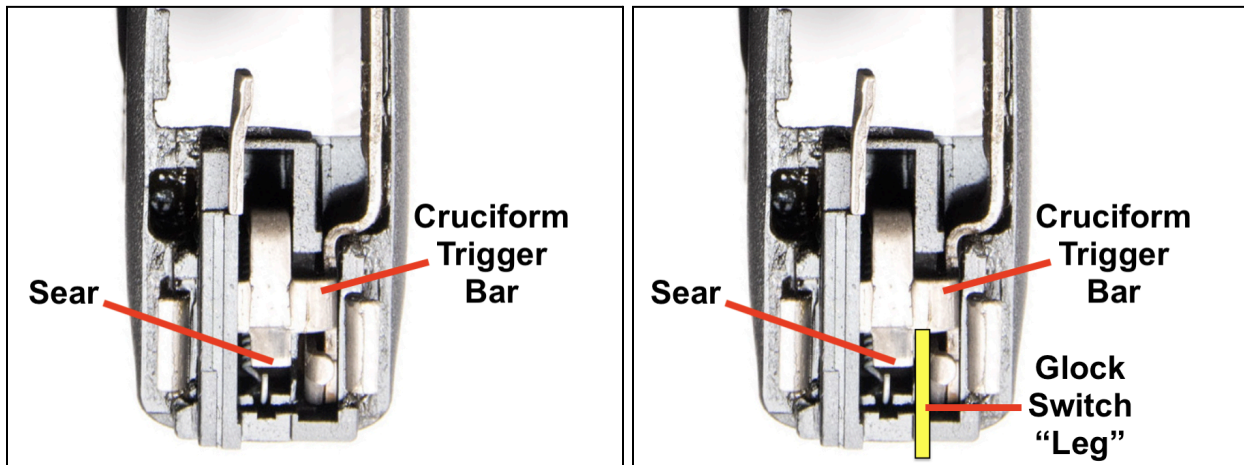
This problem is fixable, however. The only pistols compatible with switches are those that use Glock-style trigger bars, including Glocks and Glock clones designed to capitalize on the company's expired patents and market share — like the Ruger RXM that debuted in December 2024 and pistols made by several smaller companies.

Other pistols made by the largest manufacturers — including Smith & Wesson, Sig Sauer, Springfield, and others — are incompatible with switches because their trigger bars are broken into smaller, disparate components that are shielded from interference.

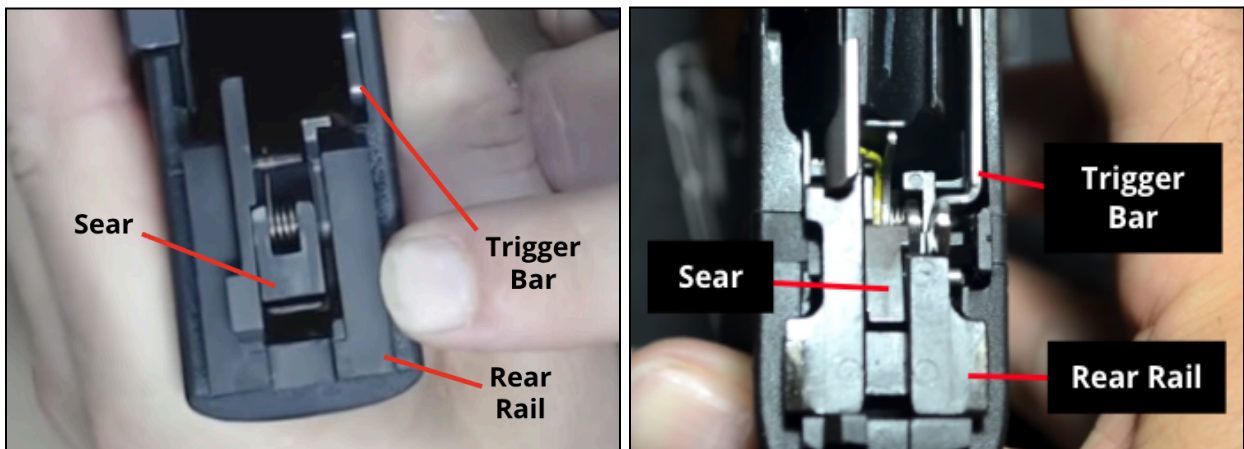
That is why I believe this bill offers a smart, targeted approach to solving this problem and saving lives. Under this bill, gun dealers won't be able to sell to the public guns that use cruciform trigger bars and can be modified with switches using common household tools. At the same time, the bill would not touch most of the handgun market, the guns people already own, or sales to law enforcement. I respectfully ask you to stand up for public safety and pass this bill. Thank you.



A Glock switch attaches to the rear of a Glock slide (left) and contacts the trigger bar (right).



These top-down views show a Glock's cross-shaped (or "cruciform") trigger bar and where a Glock switch (shown in yellow) pushes the trigger bar downward, causing the gun to fire.



Adding a switch to Springfield XD (left) or Smith & Wesson M&P (right) pistols would require extensive modifications and engineering.

# **Mayor Littmann SB 334 Support Letter.pdf**

Uploaded by: Jared Littman

Position: FAV



**Mayor Jared Littmann**

*City of Annapolis*  
160 Duke of Gloucester Street  
Annapolis, Maryland 21401

February 2nd, 2026

Chair Smith and members of the Senate Judicial Proceedings Committee,

I write in strong support of Senate Bill 334, sponsored by Senator Sara Love, which will help create a safer firearms market by strengthening design regulations for pistols, preventing them from being easily compatible with illegal auto sears that turn them into homemade machine guns.

As Mayor, public safety is one of my very top priorities. Thankfully, serious violent and property crimes dropped 7% in Annapolis last year, but even a single shooting is a tragedy. We should always stay ahead of the curve and be passing policies that enhance safety for our residents.

Prior to taking office, my team and I brought together two dozen safety professionals, community leaders, clergy, and citizens back in May for my Public Safety Forum to talk through key issues and solutions. One of the key points we heard from residents was a need to hold people accountable for illegal guns and gun trafficking. I strongly believe that this accountability must be expected both from people trafficking illegal guns, and from the gun industry if their business practices enable traffickers and people committing violent crimes.

No gun company should be manufacturing and selling pistols into Maryland that can be quickly and easily turned into machine guns by people who want to put our community in danger. This common-sense legislation will ensure there are less easily convertible pistols being sold to Marylanders, while still preserving law-abiding people's right to purchase and use firearms for self defense.

I respectfully urge you to pass this bill into law, and I'm appreciative of your consideration of my request.

Sincerely,

A handwritten signature in black ink that reads "Jared Littmann". The signature is written in a cursive style.

**Jared Littmann**  
Mayor, City of Annapolis

# **Senate Bill 334 Convertible Pistol Device Prohibit**

Uploaded by: Jason Lee

Position: FAV



# FREDERICK

OFFICE OF THE MAYOR

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The Honorable Will Smith, Jr., Esq.  
Maryland State Senate  
3 West Miller Senate Office Building  
11 Bladen Street  
Annapolis, MD 21401

**RE: Letter of Support – Senate Bill 334 – Criminal Law – Firearm Crimes – Machine Gun Convertible Pistols**

Dear Chair Smith, Vice Chair, and Members of the Judicial Proceedings Committee,

I write in strong support of Senate Bill 334, which would prohibit the manufacture, sale, transfer, and possession of machine gun convertible pistols in Maryland.

This legislation addresses an emerging and dangerous threat to public safety, which is the increasing availability of semiautomatic pistols that can be easily converted into fully automatic machine guns using inexpensive, easily obtainable conversion devices. As defined in SB 334, these are semiautomatic pistols that can be readily converted into a machine gun using common tools and without additional engineering or modification to the trigger mechanism.

### **The Public Safety Threat**

The conversion devices often referred to as “Glock switches” or pistol converters can transform a standard handgun into a weapon capable of firing multiple rounds with a single trigger function — dramatically increasing lethality in seconds. These devices are increasingly trafficked online, including through encrypted messaging platforms, and can be manufactured using 3D printers.

Recent criminal cases in Maryland demonstrate the real and immediate nature of this threat. In Frederick, federal investigators uncovered multiple firearms, machine gun conversion devices, ghost gun components, and hundreds of rounds of ammunition connected to firearms trafficking activity. In prior years, this same individual had already been arrested by a Frederick Police officer while carrying firearms. Had those weapons been easily convertible to machine guns, that single officer could have been grossly outgunned in seconds, creating an extremely high-risk situation for law enforcement and the surrounding community

When a pistol is converted into a machine gun:

- Accuracy decreases while volume of fire increases dramatically
- The likelihood of unintended casualties rises sharply
- Law enforcement response becomes more dangerous and more complex
- Neighborhoods face greater risk of mass-casualty events



# FREDERICK

OFFICE OF THE MAYOR

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Beyond officer and community safety, these weapons destabilize community safety overall. Machine gun conversion devices are particularly dangerous because they lower the barrier between standard firearm possession and machine gun capability. SB 334 appropriately targets that conversion point.

SB 334 does not attempt to regulate lawful firearm ownership broadly. Instead, it focuses specifically on pistols designed in a way that allows rapid, simple conversion into machine guns and the devices that enable that conversion.

The bill also includes clear exemptions for military, law enforcement, and certain licensed dealers acting within the scope of lawful activity, ensuring legitimate operational needs remain protected.

Importantly, the bill establishes a forward-looking prohibition date and allows the Department of State Police to implement regulations and publish lists of prohibited models, providing clarity and enforceability.

## Conclusion

Maryland has long taken a thoughtful, evidence-based approach to reducing gun violence while respecting lawful ownership. SB 334 continues that tradition by addressing a modern, fast-growing threat that did not exist at scale even a decade ago.

Allowing easily convertible machine pistols to proliferate would place law enforcement officers and our residents at unnecessary and unacceptable risk. This legislation is a proactive step to prevent further harm and protect our communities.

For these reasons, I respectfully urge a favorable report on Senate Bill 334.

Thank you for your consideration and for your continued commitment to public safety in Maryland.

Sincerely,

Michael O'Connor  
Mayor, City of Frederick

# **DIY Machine Guns\_SB334\_HB577.pdf**

Uploaded by: Karen Herren

Position: FAV



**Testimony in Support of the  
Criminal Law - Firearm Crime - Machine Gun Convertible Pistols  
Senate Bill 334 / House Bill 577  
*Karen Herren, Executive Director***

February 5, 2026

Marylanders to Prevent Gun Violence (MPGV) is a statewide organization dedicated to reducing gun deaths and injuries through evidence-based policy, public education, and survivor-centered prevention strategies. We support SB 334 / HB 577, Criminal Law - Firearm Crime - Machine Gun Convertible Pistols.

Maryland has already determined that pistol conversion devices such as Glock switches pose an unacceptable risk to public safety, enacting a statewide ban on these devices in 2024. That action was grounded in real incidents here at home, including the October 2023 mass shooting at Morgan State University, where a pistol equipped with a conversion device was used, and the continued recovery of modified pistols by law enforcement in Baltimore City and other jurisdictions. These cases demonstrate that even when possession of conversion devices is illegal, pistols designed in a way that readily accepts those devices remain uniquely dangerous and disproportionately attractive for criminal misuse.

SB 334/HB 577 responds to this reality by setting clear, prospective safety standards for the firearms industry, ensuring that handguns sold in Maryland are not designed in ways that allow rapid and simple conversion into machine guns. Many manufacturers already produce pistols that are not susceptible to this kind of conversion; SB 334/HB577 simply requires that all manufacturers selling into the Maryland market meet that same baseline expectation of product safety. By addressing preventable design vulnerabilities, without impacting current lawful owners or law enforcement use, the bill represents a measured, evidence-based approach to reducing the risk of extreme harm and strengthening accountability in the firearm industry.

We urge a favorable report on SB 334.

# **Laranjani English Testimony - SB334 Senate Hearing**

Uploaded by: Laranjani English

Position: FAV

## **Laranjani English - Watkins Mill High School Students Demand Action Leader**

### **SB334 Senate Hearing**

**2/5/26**

Hello, my name is Laranjani English, but most people know me as AJ. I'm a sophomore at Watkins Mill in Montgomery County, and a Students Demand Action volunteer.

I'm only 14 years old. I should be worried about homework, sports, and what I want to be when I grow up, not about whether I'll make it home alive.

But this is the reality my generation is living in.

Machine guns are illegal in Maryland. They're supposed to be off our streets. And yet, they keep showing up because the gun industry found a loophole.

We call them DIY machine guns. They start as regular pistols, but their design allows them to be converted into fully automatic weapons with a tiny, Lego-sized device called a switch. With that one add-on, a normal handgun can fire up to 1,200 rounds per minute — 20 rounds every second. That terrifies me, and it shouldn't be possible. Ever.

The switches themselves are already illegal. But because they're small, cheap, and easy to make with 3D printers, they're flooding our communities. ATF data shows that recoveries of these devices increased by nearly 800% in just four years. Law enforcement is finding them all across Maryland.

Guns are the leading cause of death for children and teens in Maryland. Most young people who die by guns are killed by someone else. So while gun manufacturer profits continue to go up, we live in fear of our lives being cut short every day.

This bill doesn't take guns away from responsible owners, punish responsible dealers, or target law enforcement or the military. It does one simple, common-sense thing: it holds the gun industry accountable and stops the sale of handguns that can easily be turned into illegal machine guns. We're not alone in this fight, either. 84% of Maryland voters support requiring manufacturers to design pistols so they cannot be turned into a fully automatic machine gun.

We shouldn't have to wait for another tragedy to make this obvious. I am tired of looking at the news every other day and seeing my generation ripped apart. We deserve more than thoughts and prayers. We deserve prevention. We deserve accountability. And we deserve to feel safe in our schools and our neighborhoods.

I ask our legislators, please pass this bill, for students like me, and for the future we're trying to survive long enough to reach.

**SB 334 - MNADV - FAV.pdf**

Uploaded by: Laure Ruth

Position: FAV



**BILL NO:** Senate Bill 334  
**TITLE:** **Criminal Law - Firearm Crimes - Machine Gun Convertible Pistols**  
**COMMITTEE:** Judicial Proceedings  
**HEARING DATE:** February 5, 2026  
**POSITION:** **FAVORABLE**

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The Maryland Network Against Domestic Violence (MNADV) is the state domestic violence coalition that works to lead diverse community partners toward the common purpose of reducing the occurrence and impact of intimate partner violence. **MNADV urges the Senate Judicial Proceedings Committee to issue a favorable report on SB 334.**

While it is a public safety bill rather than a direct "survivor-centric" service bill, SB 334's provisions are highly significant for domestic violence survivors due to the specific nature of firearm lethality in domestic disputes. The bill targets a rising trend in violent crime: the use of "Glock switches" or other conversion devices.

Senate Bill 334 bans the manufacture, sale, possession, and transfer of "machine gun convertible pistols"—semiautomatic handguns modified to fire automatically with a single trigger pull. It establishes strict criminal penalties for those found in possession of these "switches" or modified firearms, treating them as prohibited machine guns under Maryland law.

SB 334 also modernizes the state's definition of "rapid-fire activators" to include 3D-printed devices and other newer technologies used to bypass standard firearm safety mechanisms. Many conversion switches are 3D-printed or sold untraceably. Survivors are often at higher risk when abusers who are already legally prohibited from owning firearms (due to prior protective orders or convictions) acquire these untraceable, highly lethal modifications.

MNADV supports legislation like SB 334 because of the direct link between high-capacity, rapid-fire weaponry and the escalation of domestic lethality. Research consistently shows that the presence of a firearm in a domestic violence situation **increases the risk of homicide by 500%**. By removing "machine gun" capabilities from handguns, the bill aims to prevent a split-second escalation from becoming a mass-casualty event or an inescapable lethal encounter.

The bill gives Maryland law enforcement clearer authority to intervene and remove these specific high-risk weapons during investigations or when serving protective orders.

For the above stated reasons, the **Maryland Network Against Domestic Violence urges a favorable report on SB 334.**

For further information contact Laure Ruth ■ Public Policy Director ■ 301-852-3930 ■ [lruth@mnadv.org](mailto:lruth@mnadv.org)

# **2026 Stop The Spread of DIY Machine Guns - Google**

Uploaded by: Layla Greten

Position: FAV



Testimony of Layla Greten, Team ENOUGH  
Support for SB 334 [FAV]  
Before the Maryland Senate Judicial Proceedings Committee  
February 5, 2025

Dear Chair Smith, Vice Chair Waldstreicher, and esteemed members of the Senate Judicial Proceedings Committee:

My name is Layla Greten. I am a high school student at Archbishop Spalding High School and the founder of a local Team ENOUGH chapter, a youth-led initiative under Brady United Against Gun Violence. I am writing to voice my support for SB 334. As the President of Team ENOUGH Baltimore, I oversee nearly 50 students across Maryland and multiple school chapters, with a shared passion and commitment to gun violence prevention.

SB 334 will require all pistols sold in the state of Maryland to be designed in a way that they cannot be easily converted into automatic weapons by the use of “auto-sears,” also known as Glock switches. It is important to note that these “auto-sears” are banned on both the state and federal levels. However, because these devices are readily available to be bought illegally or can be easily 3D printed, they are an emerging threat to communities in Maryland. This small converting device can be installed in minutes and transform a firearm into a weapon that shoots continuously with one trigger pull, with the ability to fire 1,200 continuous rounds in one minute.

The truth is, having the opportunity to add a switch to a firearm amplifies harm in an instrumental way. Attaching a switch dramatically increases the opportunity for injury and eliminates the safeguards existing on handguns that prevent harm. A shooter no longer has to pull and release the trigger repeatedly, giving them a much faster rate of fire. This escalates violent situations and results in increasingly deadly outcomes for innocent bystanders and victims. Individuals in crisis and without training should not be able to create automatic weapons with simply a 3D printer and a screwdriver.

In 2023, a suspect fired at police officers during a shootout near Patterson Park. The suspect had a modified Glock and was able to shoot 33 rounds. By removing these converted pistols from the world around us, we are not only protecting our communities but also our law enforcement officers. With an increased number of automatic weapons, our officers are at increased risk of being caught, literally in the crossfire, of these dangerous firearms. What is even more alarming is that a majority of the individuals thought to be connected to these incidents are under the age of 21. My generation has been impacted the most by this crisis. Young people are both the primary victims and perpetrators. The accessibility of these deadly weapons, combined with inadequate education and intervention, has created a dangerous cycle. I have the privilege of focusing on my future instead of living in fear of being drawn into

gun violence. So many of my peers do not have this privilege. Without urgent action, more of these convertible pistols will fall into the hands of Maryland's youth, exacting even more of a toll on our society.

As a young student, I decided to conduct a quick experiment to see how accessible it would be for someone in my generation to modify a pistol. With about two Google searches, one can find a list of easily modified pistols. It only takes a few more to end up on pages where people post details about how to modify these pistols, and even pages where people post the 3D designs needed. The entire search process took me less than 10 minutes, emphasizing the accessibility of these deadly features and how easy it could be for a violent individual to go down this route.

Thankfully, there is a solution- easy design changes, and it is the responsibility of the firearms manufacturers to take this action. The companies are aware of the convertible nature of their firearms and have chosen not to make design changes. This industry rakes in billions in profit every year while our communities and students reap the consequences. By allowing for the installation of illegal modifications, it is evident that these industries are more focused on prioritizing profits than public safety. This bill simply mandates that manufacturers take responsibility and make reasonable changes to their design. We are at a crossroads: we can either allow these companies to continue their production of these vessels of destruction, or we can take a stand to protect our communities and save countless lives. Therefore, I strongly urge a favorable report for SB 334.

Signed,

Layla Greten  
Founder Team ENOUGH Baltimore

# **Testimony Daniel Webster Favorable SB344 Maryland**

Uploaded by: Mary Burger

Position: FAV

**SB 334**

**Favorable**

**TO: Chair** Smith, **Vice Chair** Waldstreicher, Members of the Judicial Proceedings Committee

**FROM:** Daniel Webster, ScD, MPH

*Professor and Distinguished Scholar, Johns Hopkins Center for Gun Violence Solutions*

**DATE:** February 5, 2026

**RE:**

SB 334 Criminal Law-Firearm Crimes-Machine Gun Convertible Pistols

---

I am a tenured professor at the Johns Hopkins Bloomberg School of Public Health and Distinguished Scholar with the Center for Gun Violence Solutions. I am writing to you in my individual capacity with over 30 years of experience leading research on violence and its prevention. The views expressed here are my own and do not necessarily reflect the policies or positions of Johns Hopkins University.

Federal law largely restricts civilian access to machine guns due to significant public safety concerns. They spray dozens of rounds in seconds and greatly increase injuries and deaths from shootings, putting bystanders at risk. Studies of firearms' capacity to rapidly fire many rounds increases the number of persons wounded or killed in a shooting. A shooters' accuracy becomes less significant when they are spraying bullets in automatic mode and putting bystanders as well as intended targets at increased risk of injury and death.

Given the lethality of these easily obtained devices and the threat to public safety, I support the favorable passage of SB 334.

Sincere Regards,



Daniel Webster, ScD, MPH

**MD SB334 Written Testimony x ET (2.3.2026).pdf**

Uploaded by: Mary Kenah

Position: FAV



## Everytown for Gun Safety Testimony in Support of SB 0160

February 3, 2026

Chair Smith and Members of the Senate Judicial Proceedings Committee:

I submit this written testimony on behalf of Everytown for Gun Safety, where I am Counsel for state legislative advocacy. On behalf of Everytown and our Moms Demand Action and Students Demand Action volunteers across Maryland, I urge a favorable report on Senate Bill 334.

This bill would prohibit the future sale of semiautomatic pistols that are easily convertible into illegal machine guns. It goes without saying that machine guns are exceptionally lethal weapons designed for use on the battlefield, meant to inflict maximum damage in minimum time. Fully automatic machine guns are illegal under federal and state law, but certain types of pistols can easily be converted to DIY machine guns at home, even by people with little to no engineering skill, using only common household tools, like a screwdriver, and a tiny piece of plastic or metal commonly known as a “Glock switch.” DIY machine guns are extremely dangerous and are spreading throughout Maryland. They can fire at a rate of up to 20 rounds per second, allowing shooters to spray bullets with a single pull of the trigger with little recoil control.

Every firearm manufacturer should be taking steps to make sure their guns can’t be easily converted into DIY machine guns — but that’s not what’s happening. The majority of gun manufacturers use designs that aren’t susceptible to easy conversion. However, despite the explosion of a market for illegal pistol converters, and an uptick in crimes committed using fully automatic modified pistols, a small number of gun manufacturers, including Glock and others, continue to offer machinegun-convertible pistols on the civilian retail market. While Glock recently introduced new models with some small design changes, it appears that even with these changes its pistols remain easy to quickly convert into illegal machine guns with common household tools and a Glock switch.

The manufacturers using this design have the ability to stop the spread of DIY machine guns. They have chosen not to, putting profit over people. We need to address gun violence from every angle, including by removing these dangerous weapons from the marketplace until these manufacturers change their design so they cannot be easily converted into machine guns.

Maryland must continue to lead the fight to hold bad actors in the gun industry responsible for their role in worsening our gun violence crisis while respecting the rights and property of current firearm owners in the state.

On behalf of Everytown for Gun Safety, I request a favorable report.

Mary Kenah  
Everytown for Gun Safety

**SB334-JPR-FAV.pdf**

Uploaded by: Nina Themelis

Position: FAV



BRANDON M. SCOTT  
MAYOR

*Office of Government Relations  
88 State Circle  
Annapolis, Maryland 21401*

**SB334**

February 5, 2026

**TO:** Members of the Judicial Proceedings Committee

**FROM:** Nina Themelis, Director of the Mayor's Office of Government Relations

**RE:** **SB 334 - Criminal Law - Firearm Crimes - Machine Gun Convertible Pistols**

**POSITION: FAVORABLE**

Chair Smith, Vice Chair Waldstreicher, and members of the Committee, please be advised that the Baltimore City Administration (BCA) supports Senate Bill 334. This legislation requires all pistols sold in Maryland to be designed in a way that ensures they cannot be quickly and easily turned into machine guns. The Baltimore Police Department confiscated 47 modified guns in 2025 and 4 so far already this year.

The danger posed by a firearm modified in this manner is difficult to overstate. Once the trigger is depressed on such a weapon, the firing sequence cannot be terminated. The firearm will continue to fire, sometimes at a rate of up to 1,200 rounds per minute, until there is no more ammunition. The Baltimore Police Department has identified the use of firearms modified with Glock switches by drug trafficking organizations as a significant and ongoing public safety threat in Baltimore. These illegally modified weapons are used to intimidate communities and facilitate acts of serious violence.

In April 2025, the Baltimore Police Department, in coordination with the Drug Enforcement Administration, dismantled a major drug trafficking organization operating in the Curtis Bay area. As a result of this investigation, nine handguns were seized, including three Glock pistols that had been illegally modified with Glock switches, converting the firearms from semi-automatic handguns into fully automatic machine guns. Absent this coordinated enforcement action, these weapons posed a substantial risk of causing a mass-shooting incident within seconds.

In October 2023, Baltimore Police responded to a mass-shooting incident at Morgan State University during a Homecoming event. Five individuals sustained non-fatal gunshot wounds. The firearm used by a 17-year-old suspect in the incident had been modified with a Glock switch. The rate of fire resulted in shattered windows in a student residence hall, demonstrating the heightened lethality and indiscriminate danger posed by these illegally modified weapons and the significant potential for additional injuries or loss of life.

These instances demonstrate the importance of this legislation. The Baltimore City Administration requests a favorable report for SB 334.

# **Testimony in support of SB0334 - Machine Gun Conve**

Uploaded by: Richard KAP Kaplowitz

Position: FAV

SB0334\_RichardKaplowitz\_FAV  
02/05/2026

Richard Keith Kaplowitz  
Frederick, MD 21703

**TESTIMONY ON SB#/0334- POSITION: FAVORABLE**

**Criminal Law - Firearm Crimes - Machine Gun Convertible Pistols**

**TO:** Chair Smith, Jr., Vice Chair Waldstreicher, and members of the Judicial Proceedings Committee

**FROM:** Richard Keith Kaplowitz

My name is Richard Keith Kaplowitz. I am a resident of District 3, Frederick County. I am submitting this testimony in support of SB#/0334, **Criminal Law - Firearm Crimes - Machine Gun Convertible Pistols**

The United States Attorneys Office of the Western District of Wisconsin has issued a press release entitled *U.S. Attorney's Office And ATF Highlight Emerging Threat Posed by Machinegun Conversion Devices*<sup>1</sup>

About an inch-long, an MCD is an illegal after-market device that converts a semi-automatic firearm into a fully functioning machinegun. A firearm equipped with a machinegun conversion device is extremely dangerous, even for experienced firearms users, because it is difficult to control and is capable of firing 50 rounds in four seconds with a single pull of the trigger. For more information about the devices, please see the attached ATF materials and video link below.

“Machinegun conversion devices are extraordinarily dangerous,” said U.S. Attorney Timothy M. O’Shea. “These devices are often used in weapons that are not designed to function as machine guns, thus making the weapons incredibly difficult to aim. Discharging a weapon equipped with such a device in a public area endangers every child and adult within range.

Despite insistence that ANY firearm is protected under the second amendment no valid reason for these specific weapons of war as qualifying to be considered for that purpose is nonsensical. They let a purpose kill many people quickly and we need to stop them on our streets and in our state.

The bill will effect that goal by prohibiting, on or after January 1, 2027, a person from manufacturing, selling, offering for sale, purchasing, receiving, or transferring a certain machine gun convertible pistol, subject to certain exceptions.

This is a common-sense restriction on guns that are dangerous to users and the public.

**I respectfully urge this committee to return a favorable report on SB#/0334.**

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<sup>1</sup> <https://www.justice.gov/usao-wdwi/pr/us-attorneys-office-and-atf-highlight-emerging-threat-posed-machinegun-conversion>

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<sup>3</sup> <https://www.bradyunited.org/resources/research/guns-in-the-hands-of-domestic-abusers-2>

# **SB 334 - Convertible Pistols - wttt- Love.pdf**

Uploaded by: Sara Love

Position: FAV



THE SENATE OF MARYLAND  
ANNAPOLIS, MARYLAND 21401

**SB 334 – Criminal Law – Firearm Crimes – Machine Gun Convertible Pistols**

Under federal law, it has been illegal to manufacture or import new machine guns for civilian sales since 1986. It is also illegal in Maryland. However, law enforcement is increasingly finding machine guns on our streets, due to pistols that can be easily converted into fully automatic weapons using a small device, also known as a ‘switch.’

SB 334, addresses this problem of DIY – Do It Yourself – Machine Guns through common sense design regulations.

What are DIY machine guns? They are pistols that can be easily converted into fully automatic weapons using a tiny, Lego-sized pistol converter or “switch”. Switches are illegal under both federal and Maryland law. However, due to the growth of 3-D printing and traffickers who smuggle and sell them, these small devices are cheap and easy to get. ATF data shows that recoveries of machine gun conversion devices, increased by 784% from 2019 to 2023 alone. Maryland data shows us that these DIY machine guns have been recovered or used in crimes across Maryland at an increasing rate.

The majority of gun manufacturers use designs that are not easily convertible to machine guns. But several do. And while those manufacturers should be taking steps to make sure their guns can’t be easily converted into DIY machine guns, they have not. That is why we need SB 334 to strengthen product safety standards for all handguns sold in Maryland, ensuring that no handgun sold to civilians can be easily converted into a DIY machine gun.

SB 334 adds machine gun convertible pistol to our current law addressing assault weapons.

SB 334 does not:

- require current owners to modify or get rid of convertible pistols they already own.
- prohibit future sales to law enforcement officers or agencies or to members of the military acting within the scope of their official business
- treat dealers unfairly. The bill has a delayed effective date so that existing inventory can still be sold.
- target responsible gun owners. It targets industry designs that make machine gun conversion possible in the first place.

Maryland can and should protect its citizens and its law enforcement from these DIY machine guns through this common sense design regulation. I respectfully request a favorable report on SB 334.

# **SB 334 - Favorable.pdf**

Uploaded by: Shamoyia Gardiner

Position: FAV

**ZEKE COHEN**  
*Council President*



100 Holiday Street, Suite 400  
Baltimore, Maryland 21202  
410-396-4804 • Fax 410-539-0647  
council.president@baltimorecity.gov

**BALTIMORE CITY COUNCIL**

BALTIMORE, MARYLAND 21202

February 5, 2026

Honorable Chair Smith and members of the Senate Judicial Proceedings committee,

**I write to you in support of Senate Bill 334, Criminal Law - Firearm Crimes - Machine Gun Convertible Pistols.** By codifying responsible pistol design standards in law, this bill will help reduce the flow of pistols into Maryland--pistols which are easily converted into illegal machine guns through the use of “switches”.

Baltimore City has seen an influx of these illegally converted machine guns in recent years; the Baltimore Police Department (BPD) reported that recoveries nearly doubled between 2024 and 2025. Guns modified with switches have been recovered in the possession of teenagers and in connection with drug trafficking. These firearms are both extremely dangerous and concealable, posing a major threat to our communities and law enforcement.

We have made historic progress in reducing gun homicides in Baltimore City through an all-of-the-above strategy involving a combination of trauma-informed care, credible messengers, community policing, and common-sense gun laws. However, we must continue to stay ahead of the curve, address root causes of gun violence, and prevent deadly weapons like homemade machine guns from spreading in our communities.

By reducing the wide availability of easily convertible firearms, this bill takes a smart step towards making Baltimore and all of Maryland safer. For all these reasons, **I urge the committee to vote favorably on this bill.** Please contact my office with any further questions.

CC: Shamoyia Gardiner, Deputy Chief of Staff and Legislative Director

**PGCSAO Written Testimony - SB 334.pdf**

Uploaded by: Tara Jackson

Position: FAV

TARA H. JACKSON  
STATE'S ATTORNEY



**State's Attorney for Prince George's County**

14735 Main Street, Suite M3403  
Upper Marlboro, Maryland 20772  
301-952-3500

February 5, 2026

The Honorable William C. Smith, Jr.  
2 East Miller Senate Office Building  
Annapolis, Maryland 21401

Good Afternoon, Chair Smith, Vice-Chair Waldstreicher, and the members of the Senate Judicial Proceedings Committee:

I am Tara Jackson, State's Attorney for Prince George's County, and I am submitting this testimony in support of Senate Bill 334, also known as **Criminal Law – Firearm Crimes – Machine Gun Convertible Pistols**.

Senate Bill 334 would prohibit a person from manufacturing, selling, offering for sale, purchasing, receiving, or transferring in Maryland a certain class of firearm known as a convertible pistol—defined as any semi-automatic pistol that can be converted into a machine gun solely by attaching a switch or similar device.

This legislation addresses a growing and unique threat to public safety in our state. Certain pistol designs—including, but not limited to, those produced by Glock and other manufacturers—are engineered in a way that allows users to convert them into fully automatic weapons using inexpensive parts such as an “auto-sear” or Glock switch. While both federal and Maryland law already make automatic weapons illegal for most individuals to possess or manufacture, these conversion devices can be illegally purchased or even 3D-printed at home, effectively creating machine guns with readily available tools. This dangerously lowers the barrier for criminals to obtain weapons capable of firing dozens of rounds per second with minimal effort.

The threat posed by easily converted automatic weapons cannot be overstated. These modifications can transform a common semi-automatic pistol into a weapon capable of discharging up to 1,200 rounds per minute, far beyond what a shooter could achieve without the illegal device.

Senate Bill 334 would close a dangerous loophole by preventing the sale and transfer of firearms that are uniquely susceptible to such conversions, thereby reducing the availability of functionally automatic weapons on Maryland's streets. This legislation is a proactive step toward holding firearm manufacturers accountable for design features that facilitate illegal modification, limiting the proliferation of weapons of mass destruction in the wrong hands, and enhancing community safety.

For these reasons, I respectfully urge this committee to give Senate Bill 334 a favorable report.

Thank you,

A handwritten signature in blue ink that reads "Tara H. Jackson".

Tara H. Jackson  
State's Attorney

**SB 0334.docx.pdf**

Uploaded by: Tarria Stanley

Position: FAV



Written Testimony of Tarria Stanley  
Deputy Director of Legislative Advocacy, Community Justice  
Co-lead, Marylanders to Prevent Gun Violence

Senate Bill 0334, Criminal Law - Firearm Crimes - Machine Gun Convertible Pistols  
Judicial Proceedings Committee  
February 5, 2026

Good afternoon, Chair Smith, Vice-Chair Waldstreichert, and esteemed committee members. Thank you for the opportunity to testify today. My name is Tarria Stanley, and I am here today on behalf of Community Justice. Community Justice is a national organization that advocates for gun violence prevention by empowering those closest to the pain to advance lifesaving solutions.

We submit this testimony in strong support of **Senate Bill 0334** because our communities are losing more people to these weapons—and we cannot afford to wait.

DIY machine guns are becoming more common in our neighborhoods, and the harm is escalating. Fully automatic firearms have long been illegal, yet pistols sold today can be easily converted into machine guns using a small device known as a Glock switch. These weapons can fire up to 20 rounds per second, turning everyday conflicts into mass-casualty events and making it nearly impossible to protect innocent bystanders.

In Maryland, modified pistols have been recovered across the state and were used in the October 2023 mass shooting at Morgan State University. In Baltimore alone, police recovered nearly twice as many modified Glockes in 2024 as the year before. Each recovery represents not just a statistic, but a life put at risk—families, students, and neighbors caught in the crossfire.

Our communities are doing the work every day to prevent violence and keep people safe. But when firearms are designed in ways that allow them to be easily transformed into illegal machine guns, that work is undermined. Most gun manufacturers already use designs that cannot be easily converted. A small number continue to put dangerous products into our communities, despite knowing the risks.

SB 0334 is a common-sense, preventative solution. It does not impact current gun owners or law enforcement. It simply ensures that new pistols sold in Maryland cannot be quickly and easily converted into machine guns.

Protecting public safety means protecting our communities. We respectfully urge a favorable report on SB 0334.



# **2026 SB0334 Testimony Against 2026-02-05.pdf**

Uploaded by: Alan Lang

Position: UNF

# Testimony Against SB0334

Honorable Senators

Please enter an unfavorable decision about SB0334.

I am opposed to prohibiting, on or after January 1, 2027, a person from manufacturing, selling, offering for sale, purchasing, receiving, or transferring a certain machine gun convertible pistol, subject to certain exceptions.

I do not believe that a semi-automatic gun that can be legally purchased, should be banned because someone can illegally convert it to an automatic weapon.

Instead of banning the gun, ban the sale or making of the conversion kit.

Please enter an unfavorable decision about SB0334.

Alan Lang  
45 Marys Mount Road  
Harwood, Maryland 20776  
Legislative District 30B  
410-336-9745  
[Alanlang1@verizon.net](mailto:Alanlang1@verizon.net)

February 3, 2026

# **SB 334 Machine Gun Convertible Pistols.pdf**

Uploaded by: Cathy Wright

Position: UNF

**Senate Judicial Proceedings Committee**

**SB 334**

**Criminal Law – Firearm Crimes – Machine Gun Convertible Pistols**

**UNFAVORABLE**

I write in opposition to SB 334 Criminal Law – Firearm Crimes – Machine Gun Convertible Pistols. This bill apparently seeks to address the misuse of firearms but will impact only the law-abiding citizens of Maryland – not criminal behavior.

State and federal law already prohibits machine guns and rapid-fire devices. SB 334 focuses on the design of an entire class of semiautomatic pistols and risks criminalizing common, lawfully possessed firearms. This bill does not target illegal conversions by the criminals who use them.

SB 334 is another ineffective gun control bill that will not reduce violent crime: witness other states with similar bans. This is just another effort by gun control activists to ban all firearms and is a total disregard of our constitutional rights.

I respectfully request an UNFAVORABLE report on SB 334.

Thank you for your consideration.

Sincerely,  
Cathy S. Wright  
North Beach, MD 20714

# **SB334 Opposition Letter.pdf**

Uploaded by: Christopher Kopacki

Position: UNF



**CHRISTOPHER G. KOPACKI, PH.D.**

Director, Government Relations - State Affairs

ckopacki@nssf.org | 202-893-2177 | nssf.org

400 N. Capitol Street NW, Suite 475, Washington, D.C. 20001

February 5, 2026

The Honorable William C. Smith Jr.  
Chair, Senate Judicial Proceedings Committee  
Miller Senate Office Building  
Annapolis, Maryland 21401

Re: Senate Bill 334 – Criminal Law – Firearm Crimes – Machine Gun Convertible Pistols

Chairman Smith and Members of the Judicial Proceedings Committee,

My name is Chris Kopacki, and I serve as Director of Government Relations for the Mid-Atlantic region for the National Shooting Sports Foundation (“NSSF”), the trade association for the firearm, ammunition, and hunting industry. On behalf of NSSF and its members, I respectfully request an unfavorable report on Senate Bill 334.

NSSF strongly opposes SB 334 because it is unnecessary, overbroad, and unlikely to improve public safety. The conduct of the bill is intended to address the manufacture, possession, or use of devices that convert a semiautomatic firearm into a machine gun is already prohibited under federal law and Maryland law, with severe criminal penalties. Auto-sears, switches, and similar conversion devices are defined as machine guns themselves under federal law, regardless of whether they are installed, and are already illegal to possess or transfer.

Rather than focusing on criminal misuse or illegal trafficking of these devices, SB 334 takes a fundamentally different and flawed approach by banning firearms based on their theoretical ability to be modified with an already-illegal device. As other stakeholders have noted, virtually any semiautomatic pistol can, in theory, be altered with an illegal auto-sear. By regulating firearms based on hypothetical vulnerability rather than actual conduct, the bill risks sweeping in a broad category of common, lawfully owned handguns without meaningfully deterring criminal behavior.

SB 334 also introduces a highly technical and subjective definition of a “machine gun convertible pistol,” relying on concepts such as whether a firearm can be “readily converted” using “common household tools.” These terms lack clear, objective standards

and invite inconsistent enforcement. Law-abiding firearm owners, federally licensed dealers, manufacturers, and even gunsmiths could face criminal exposure based on design characteristics that have long been lawful and federally approved.

Additionally, the bill grants the Department of State Police broad authority to publish and modify a list of prohibited firearms through regulation, without clear statutory criteria or legislative oversight. This approach raises due process concerns and creates uncertainty for businesses and consumers attempting to comply with the law. Firearms that are lawful today could be rendered contraband through administrative action rather than legislative process.

SB 334 may also have unintended consequences for law enforcement and public agencies. Many of the firearms potentially implicated by this bill are standard-issue sidearms widely used by law enforcement agencies nationwide. While exemptions exist, the breadth and ambiguity of the bill's language raise questions about procurement, servicing, and long-term availability of commonly used duty firearms.

Most importantly, SB 334 does not address the actual source of criminal firearm conversions. Auto-sears and similar devices are overwhelmingly smuggled or unlawfully manufactured, often through illegal importation or 3D printing, and are already prohibited. Individuals who possess or use them are already committing serious felonies. This bill does not meaningfully increase deterrence for those actors, but instead shifts focus toward lawful commerce and lawful ownership.

NSSF supports efforts that prioritize enforcement of existing laws, prosecution of violent offenders, and disruption of illegal trafficking networks. SB 334, however, duplicates existing prohibitions, expands criminal liability through vague and speculative standards, and risks unintended consequences for law-abiding Marylanders and lawful businesses without a demonstrated public-safety benefit.

For these reasons, NSSF respectfully urges the Committee to issue an unfavorable report on Senate Bill 334.

Thank you for your consideration.

Respectfully submitted,

Chris Kopacki

Director of Government Relations, Mid-Atlantic

National Shooting Sports Foundation

**SB0334.pdf**

Uploaded by: Galen Muhammad

Position: UNF

## OPPOSITION TESTIMONY ON SENATE BILL 334

(Criminal Law – Firearm Crimes – Machine Gun Convertible Pistols)  
Senate Judicial Proceedings Committee  
Hearing: February 5, 2026  
Position: Oppose Senate Bill 334

Chair, Vice-Chair, and Members of the Committee:

My name is Galen Muhammad and I am the chapter president of Onyx Sharpshooters, the Forestville, MD chapter of United 2A Collective.

Thank you for the opportunity to submit testimony on Senate Bill 334. While all stakeholders share the goal of reducing violent crime and keeping Maryland’s communities safe, I respectfully oppose this bill as currently drafted due to significant concerns about overbreadth, unintended consequences, and impacts on law-abiding individuals and the economy.

Maryland General Assembly

### 1. Overbroad Definition and Unintended Sweeping Ban

SB 334 would prohibit the manufacture, sale, offer for sale, purchase, receipt, or transfer of so-called “machine gun convertible pistols,” a category that, under current interpretations, could include many common semi-automatic handguns owned lawfully by Maryland residents today — including popular models with features that federal law already regulates.

## 2A MARYLAND

The proposal’s broad language lacks clear, objective criteria, creating ambiguity and enforcement challenges. Without precise definitions, ordinary semi-automatic pistols could be classified as prohibited solely because of their potential to theoretically be modified — even if such modifications remain illegal under federal law. This sweeping prohibition risks criminalizing everyday firearms owned by responsible citizens without a demonstrable link to actual harm.

### 2. Penalizes Law-Abiding Gun Owners, Not Criminals

Current federal law already prohibits possession and use of conversion devices such as auto sears, and penalties for illegal automatic weapons production and possession are well established. SB 334 effectively penalizes lawful owners and the lawful commerce in pistols — instead of targeting illegal possession or use of conversion devices themselves. Law-abiding Marylanders would be deprived of property and legal commerce without clear evidence that possession of these pistols contributes meaningfully to violent crime beyond what existing law already addresses.

### 3. Risks Economic and Enforcement Burdens

A broad ban on categories of commonly owned pistols would create substantial burdens: Law enforcement and courts would face increased challenges interpreting and enforcing ambiguous criteria. Retailers, collectors, and private sellers could lose significant inventory and investment without due process or compensation. Maryland's firearm-related businesses might suffer economic disruption from forced devaluation of lawful products.

### 4. Policy Should Target Criminal Misuse, Not Lawful Possession

While preventing violent crime is critically important, legislation must be carefully tailored to focus on criminal misuse rather than restricting the rights of individuals who comply with existing law. Broad restrictions on legal pistol ownership based on hypothetical misuse set a concerning precedent for future overreach.

### Conclusion

For these reasons, I urge the Committee to oppose Senate Bill 334 in its current form. If the legislature wishes to address firearm-related crime, the focus should be on strengthening enforcement against illegal conversion devices and criminal misuse, clarifying definitions, and ensuring that measures respect the rights of law-abiding gun owners while not unduly burdening lawful commerce and possession.

Thank you for your consideration.

**SB0334\_Testimony\_2A\_Maryland.pdf**

Uploaded by: John Josselyn

Position: UNF



**Senate Bill 0334**  
**Criminal Law - Firearm Crimes - Machine Gun Convertible Pistols**  
**UNFAVORABLE**

Existing law already bans any “rapid fire activator” type device, including a removable manual or power–driven activating device, constructed so that, when installed in or attached to a firearm, the rate at which the trigger is activated increases, or the rate of fire increases. “Rapid fire activators” include a bump stock, trigger crank, hellfire trigger, binary trigger system, burst trigger system, switch/auto–sear, or a copy or a similar device, regardless of the producer or manufacturer.

The so-called “Pistol Converter” AKA “Glock switch” is already banned under Federal law and existing Maryland Criminal Law§4-301 (m) and (n).

A person who violates this subtitle is guilty of a misdemeanor and on conviction is subject to imprisonment not exceeding 3 years or a fine not exceeding \$5,000 or both.

A person who uses a “rapid fire activator,” in the commission of a felony or a crime of violence as defined in § 5–101 of the Public Safety Article is guilty of a misdemeanor and on conviction, in addition to any other sentence imposed for the felony or crime of violence, shall for a first violation be sentenced to imprisonment for not less than 5 years and not exceeding 20 years. For each subsequent violation, the person shall be sentenced to imprisonment for not less than 10 years and not exceeding 20 years.

Should Senate Bill 334 become law, most Glock models (e.g., 17, 19, 21, 22, 23, 31, 32) which utilize a cruciform trigger bar design as well as Glock-style clones such as the Ruger RXM which utilize a similar cruciform bar concept will be rendered valueless to their lawful owners. Criminals will not be impacted by the new law because they do not acquire firearms through the legal market. Senate Bill 334 will raise the black market value of Glock style pistols and 3D printed pistols which are already illegal in Maryland.

When the Maryland General Assembly passes legislation which limits the civil and Constitutional Rights of citizens due to the actions of the criminals, it blurs the line as to which constituency it is truly serving.

This proposed ban on a legal product, currently owned by tens of thousands of law-abiding citizens, simply because it may be used by criminals, presents some interesting parallels.

For example:

- Even though voting machine errors are uncommon considering the number of voting machines, we should consider banning voting machines.
- Most citizens who wear hoodies are law-abiding, are we to ban these popular garments simply because so many crimes are committed by criminals who often use these hooded garments to conceal their identity.
- Speeding vehicles and impaired drivers are a nationwide problem. Should we require speed limiting devices and DUI limiting devices on all vehicles for all Maryland citizens?

While the foregoing scenarios are for illustrative purposes only, they do demonstrate the peculiar attraction of legislation which mistakenly shifts the focus of our laws to inanimate objects rather than the actions of those who violate the law.

It is worth noting that there are exemptions for:

- Certain law enforcement agencies, including United States Immigration and Customs Enforcement (ICE)
- Transfer to law enforcement officers upon retirement
- Employees of armored car companies

Glock pistols and those of similar design are among the most common handguns in Maryland. Persecuting the law-abiding in response to the actions of criminals is anathema to the Legislature's obligation to ensure equal justice under the law.

Human ingenuity gives us the ability to adapt machines to perform functions not envisioned by the original designers. Firearms are simply machines. Many firearms can be modified to allow fully automatic fire using only a simple flat file. GI's in World War 2 did such modifications to convert the classic M1 Garand rifle from semi-automatic to fully automatic.

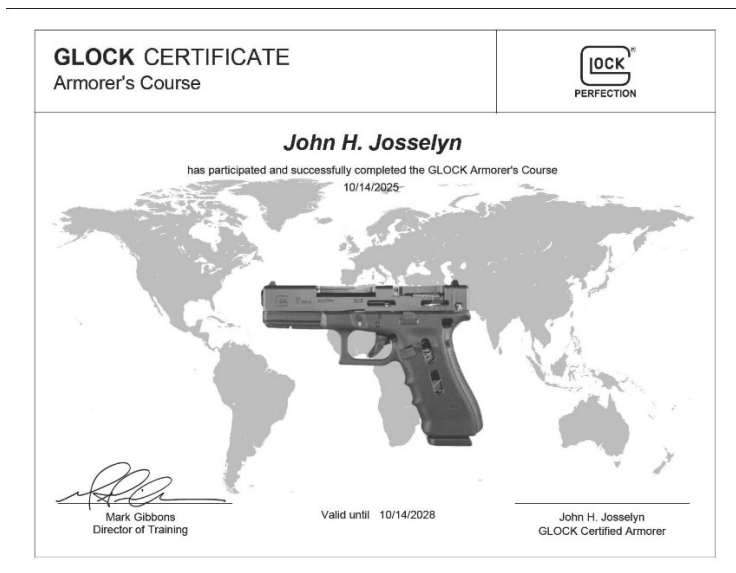
Senate Bill 334  
Unfavorable

A very common .22 caliber semi-automatic rifle (estimated 11 million in existence) can be modified to fully automatic fire with the same flat file.

Such conversions are virtually unheard of, simply because unlike criminals, we as law-abiding citizens respect the rule of law. Does SB 334 signal the advent of a legislative witch hunt which will extend to every semi-automatic rifle, pistol and shotgun?

We strongly urge the Committee to trust our law-abiding citizens and return an unfavorable report on Senate Bill 334.

John H. Josselyn  
2A Maryland  
02/05/2026





**Glock Cruciform Trigger Bar Assembly – Top View**



**Glock Cruciform Trigger Bar Assembly – Side View**

# **Criminal Law - Firearm Crimes - Machine Gun Conver**

Uploaded by: Karla Mooney

Position: UNF

SB 0334/ HB 0577 Criminal Law - Firearm Crimes - Machine Gun Convertible Pistols

Reading this bill brings up many questions. How do you make hundreds of thousands of people criminals by banning a commonly owned gun? How do you propose to deal with all the people who have and currently own these guns. There is a note that Police officers are still allowed to use them – which is good since that is their duty weapon in most cases.

In case it has not been mentioned to the writers of the bill the switches are already illegal, therefore all of this is unnecessary and a waste of man power to try to implement.

As is true in most new bills – they are written with much overlapping regulation that if the current laws could just be upheld as written and no new law would be required.

I appeal to the writers of this bill to just allow current law to be enforced and rescind this bill as it is not necessary. Criminals do not follow law and do not care if what they are doing is illegal, so this will not change anything for them.

I ask for this bill to have an unfavorable report

Karla Mooney

Maryland Director of Women for Gun Rights

Resident of District 29C – Leonardtown MD

# **MSI Testimony on SB 334 convertible pistols final.**

Uploaded by: Mark Pennak

Position: UNF



President  
Mark W. Pennak

February 5, 2026

**WRITTEN TESTIMONY OF MARK W. PENNAK, PRESIDENT,  
MARYLAND SHALL ISSUE,  
IN OPPOSITION TO SB 334 and HB 577**

I am the President of Maryland Shall Issue (“MSI”). Maryland Shall Issue is a Section 501(c)(4), all-volunteer, non-partisan, non-profit organization dedicated to the preservation and advancement of gun owners’ rights in Maryland. It seeks to educate the community about the right of self-protection, the safe handling of firearms, and the responsibility that goes with carrying a firearm in public. I am also an attorney and an active member of the Bar of the District of Columbia and the Bar of Maryland. I retired from the United States Department of Justice, where I practiced law for 33 years in the Courts of Appeals of the United States and in the Supreme Court of the United States. I am an expert in Maryland Firearms Law and the law of self-defense. I am also a Maryland State Police certified handgun instructor for the Maryland Wear and Carry Permit and the Maryland Handgun Qualification License (“HQL”) and a certified NRA instructor in rifle, pistol and personal protection in the home and outside the home and muzzle loading. I appear today as President of MSI in OPPOSITION to SB 334 and its cross-file, HB 577 (“the Bill”).

**The Bill and Existing State Law:** This Bill amends MD Code, Criminal Law, § 4-301 to address a new type of firearm, *viz.*, a “MACHINE GUN CONVERTIBLE PISTOL” which is defined to mean “ANY SEMIAUTOMATIC PISTOL WITH A CRUCIFORM TRIGGER BAR THAT CAN BE READILY CONVERTED BY HAND OR BY USING COMMON HOUSEHOLD TOOLS INTO A MACHINE GUN BY THE INSTALLATION OR ATTACHMENT OF A PISTOL CONVERTER AS A REPLACEMENT FOR THE SLIDE’S BACKPLATE WITHOUT ANY ADDITIONAL ENGINEERING, MACHINING, OR MODIFICATION OF THE PISTOL’S TRIGGER MECHANISM.” This Bill would then enact a new subsection 4-305.2 to the Criminal Law article to provide that “ON OR AFTER JANUARY 1, 2027, A PERSON MAY NOT MANUFACTURE, SELL, OFFER FOR SALE, PURCHASE, RECEIVE, OR TRANSFER A CONVERTIBLE PISTOL.” Mere possession would remain legal as would transfer by inheritance and temporary transfers for servicing to licensed firearms dealer or gunsmith. See MD Code, Criminal Law, § 4-302. Other types of temporary transfers and receipts would, by negative implication, be banned.

A violation of new Section 4-305.2 would then be punishable under existing law with imprisonment “not exceeding 3 years or a fine not exceeding \$5,000 or both.” MD Code, Criminal Law, § 4-306(a). A person who uses such a “convertible pistol” “in the commission of a felony or a crime of violence as defined in § 5–101 of the Public Safety Article” is subject to imprisonment, for the first offense, “to imprisonment for not less than 5 years and not exceeding 20 years,” with a

minimum, mandatory sentence of 5 years which may not be suspended. MD Code, Criminal Law, § 4-306(b). Such a person “is not eligible for parole in less than 5 years. *Id.* 4-306(b)(2)(iv).

### **The Bill Is Extreme**

The Bill is most obviously aimed at one manufacturer, GLOCK GES.M.B.H., based in Deutsch-Wagram, Austria, and its subsidiary, GLOCK, INC., based in Smyrna, Georgia, and which together produce and market semi-automatic Glock pistols in the United States and throughout the world. The Bill is effectively designed to ban Glock pistols from Maryland. Full Stop. That is a drastic step. Glock pistols are among the most popular and most reliable handguns sold in the United States. Glock pistols are issued as standard equipment to law enforcement officers by the Maryland State Police and other police departments throughout the State. If this Bill becomes law, Glock will simply exit the Maryland market entirely and thus stop doing business in Maryland.

Glock is unlikely to modify its patented<sup>1</sup> and extremely reliable design of legal semi-auto pistols, just to please Maryland. While the Bill does not purport to ban continued “possession” of previously acquired Glocks and subtitle 3 of Title 4 of the Criminal Law article does not apply to law enforcement personnel of the State, see MD Code, Criminal Law, §4-302(1), Glock is unlikely to remain in Maryland just to continue the relatively small number of sales to police. Staying in Maryland would subject itself to the continuing threat of potential lawsuits and legal harassment created by this Bill. Sooner than later, police departments all over Maryland and the State Police will be forced to switch to other manufacturers of handguns and dispose of or destroy their existing stocks of Glock pistols at great expense.

Forcing Glock to exit Maryland will not stop the illegal conversion of pistols in Maryland. Since the introduction of Glock pistols in 1982, there have been 20 million Glock pistols sold in the United States alone. <https://ammo.com/research/most-popular-guns>. As noted below, the mere possession of a conversion device is a major federal felony. Illegal possession and/or misuse of Glocks and such devices in a violent crime are serious crimes under existing State law. Persons who are willing to violate these existing laws will not be deterred by this Bill from acquiring Glocks from out-of-State sources and bringing these firearms into Maryland. Glock conversion devices are illegally manufactured abroad (principally in China) and smuggled illegally into the United States. Persons willing to possess and use such illegal devices and thereby risk many years of imprisonment will not be deterred by this Bill, regardless of whether Glock is forced out of Maryland. The Bill is simply pointless.

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<sup>1</sup> See Patent US5705763A. <https://bit.ly/4i1LhjM>

## The Bill Is Overbroad, Hopelessly Vague and Punishes Innocent Conduct

The City of Baltimore and the State of Maryland have recently filed suit against Glock in Baltimore Circuit Court. See *Mayor and City Council of Baltimore, et al. vs. Glock, Inc., et al.*, C-24-CV-25-001450 (Baltimore Circuit Court) (filed 02/20/2025). A copy of that Complaint is attached. That complaint separates out Glock as the sole defendant, alleging that Glock pistols are being “illegally modified with the insertion of a simple, dime-sized device called an auto sear, a type of machine gun conversion device.” Complaint ¶ 2. That complaint contains detailed provisions that differentiate Glock from other “striker-fired” pistols, such as those such as those “made by Smith & Wesson, Sig Sauer, Springfield Armory, or Walther Arms.” See Complaint ¶¶ 42-43, 74.<sup>2</sup>

This Bill is not so limited. Specifically, this Bill defines “convertible pistol” to include any semiautomatic pistol that “THAT CAN BE READILY CONVERTED BY HAND OR BY USING COMMON HOUSEHOLD TOOLS INTO A MACHINE GUN BY THE INSTALLATION OR ATTACHMENT OF A PISTOL CONVERTER AS A REPLACEMENT FOR THE SLIDE’S BACKPLATE WITHOUT ANY ADDITIONAL ENGINEERING, MACHINING, OR MODIFICATION OF THE PISTOL’S TRIGGER MECHANISM.”<sup>3</sup> The Bill further provides that “PISTOL

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<sup>2</sup> Also covered by this Bill are so-called “Glock clones” such as the PSA Dagger, ZEV Technologies, Shadow Systems 920, Lone Wolf D19, and the Ruger RXM. <https://bit.ly/4idYkyu>.

<sup>3</sup> For a switch/auto-sear to work on a Glock or on Glock clones, the backplate must be removed **and** the frame must be modified with a groove physically cut into the frame. Without such a modification of the frame, the arm of the illegal conversion device (which is attached to the slide) would catch on the frame and prevent the pistol from going into battery, thereby preventing the pistol from being fired. See

CONVERTER” MEANS ANY DEVICE OR INSTRUMENT THAT, WHEN INSTALLED IN OR ATTACHED TO THE REAR OF THE SLIDE OF A SEMIAUTOMATIC PISTOL, REPLACES THE BACKPLATE AND INTERFERES WITH THE TRIGGER MECHANISM, WHICH ENABLES THE PISTOL TO SHOOT AUTOMATICALLY MORE THAN ONE SHOT BY A SINGLE FUNCTION OF THE TRIGGER.” That language singles out Glock.

The Bill goes on to specifically provide “MACHINE GUN CONVERTIBLE PISTOL’ INCLUDES A PISTOL WITH A CRUCIFORM TRIGGER BAR AND A POLYMER NOTCH OR OTHER PIECE OF POLYMER MOLDED INTO THE REAR OF THE PISTOL FRAME WHERE A PISTOL CONVERTER CAN BE ATTACHED OR INSTALLED.” That language is also aimed only at Glock as only Glock pistols contain a PIECE OF POLYMER MOLDED INTO THE REAR OF THE PISTOL FRAME.” The irony is that this PIECE OF POLYMER on the frame was designed and used by Glock to make the use of a “Glock switch” **more** difficult, not less. Moreover, as explained above, **no** manufacturer, including Glock, includes “a notch” in the rear of the frame. Such a notch is created **by the criminal** to illegally add a “switch.” No “switch” can work in the absence of such a notch. See note 3, *supra*. The Bill thus imposes its bans **on criminals** who have converted a Glock pistol to use an illegal switch. That is senseless; these individuals are already criminals by the mere possession of a switch.

The effect of the Bill is to short-circuit the Baltimore case and legislatively impose the very bans on Glock pistols that Baltimore and the Attorney General’s Office are seeking to impose in the Baltimore lawsuit. The Bill effectively acts as an illegal Bill of Attainder by depriving Glock of its right to due process in the Baltimore litigation and by depriving it of its other civil rights to manufacture and sell

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image below.



otherwise perfectly legal firearms in the United States. See U.S. Const. Art. I, § 10, cl.1, The Constitutional ban on Bills of Attainder protects individuals or groups against being singled out for legislative instead of judicial trial. See *Cummings v. Missouri*, 4 Wall. 277, 320 18 L.Ed. 356 (1867) (“punishment’ for purposes of bills of attainder is not limited to criminal sanctions; rather, ‘(t)he deprivation of any rights, civil or political, previously enjoyed, may be punishment”).

This Bill’s language, while aimed at Glock, also goes beyond Glock to include *every non-cruciform striker-fired pistol*, made by other manufacturers. The Bill provides that “MACHINE GUN CONVERTIBLE PISTOL” DOES NOT INCLUDE A HAMMER-FIRED SEMIAUTOMATIC PISTOL OR A STRIKER-FIRED SEMIAUTOMATIC PISTOL WITHOUT A CRUCIFORM TRIGGER BAR, WHICH INSTEAD HAS A TRIGGER BAR THAT IS SHIELDED FROM INTERFERENCE BY A PISTOL CONVERTER.” (Emphasis added).<sup>4</sup> By negative implication any non-cruciform striker pistol is banned if its trigger bar is **not** “shielded from interference by a pistol converter.” That negative implication follows because otherwise that part of the subsection becomes wholly superfluous. Statutes are interpreted to avoid that result. See, e.g., *Breslin v. Powell*, 421 Md. 266, 287 (2011) (A statute must be read “to avoid rendering ... any portion[] meaningless, surplusage, superfluous or nugatory.”) (cleaned up).

Read in this manner the Bill’s language includes literally every striker-fired pistol, as no striker-fired pistol currently on the market “shields” the trigger bar from “interference” (whatever that means). That language would thus include the Sig P320, and Sig P365 or M&P pistol models from Smith & Wesson or the Heckler & Koch (HK) or Walther Arms pistols, the very type of pistols which the Attorney General has excluded from the Baltimore lawsuit. These popular pistols have a **non-cruciform** trigger bar but none of these pistols has a trigger bar that is “**shielded from interference by a pistol converter.**” While the trigger bar on these guns is not accessible from the rear (unlike the Glock), each of these guns has the slide engage with the trigger bar to disconnect it semiautomatically. The trigger bar cannot be “shielded” from such operation if the gun is to function. It isn’t necessary to engage with the trigger bar to convert most non-Glock handguns into machineguns. It is possible to devise a converter device on the backplate of the slide to trip the sear (which is part of “the trigger mechanism” and hence meets the definition of a “pistol converter”) on these guns. It thus possible to “readily convert” every single type of striker-fired pistol currently in existence. See, e.g., <https://www.youtube.com/watch?v=-fL1pFbqmuU&t=92s>. The Bill thus can be read to ban all striker-fired pistols, regardless of whether converter switches currently exist for those pistols.

The Bill does not define “readily convert” or “common household tools” or “shielded from interference.” Without definitions, it is simply “guesswork” whether a given

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<sup>4</sup> This language appears to exclude all hammer-fired pistols, but the language is so poorly drafted even that exclusion for hammer-fired pistols is unclear. The Bill could be clarified simply by addressing the exclusions for hammer-fired pistols and striker-fired pistols without cruciform trigger bars in separate subsections.

striker-fired pistol is covered. See *Johnson v. United States*, 576 U.S. 591, 602 ((2015) (“our holdings squarely contradict the theory that a vague provision is constitutional merely because there is some conduct that clearly falls within the provision’s grasp”). When it comes to regulating constitutional rights, guesswork is intolerable. At the least, the bans would apply not only to Glock, but also to the myriads of firearms compatible with Glock fire controls which have become massively popular. These include the Palmetto State Armory Dagger, ZEV OZ9, Shadow Systems DR920, Anderson Kiger-9C, and the Lone Wolf Arms LTD19, all of which are also on the Maryland Handgun Roster <https://bit.ly/3DgBhnJ>. All of these handguns would face extinction in Maryland under this Bill.

The Bill arguably even bans the most recent models of Glocks (the “V” series and Gen 6) which continue to use a “cruciform trigger bar” but which are specifically designed to defeat conversion devices by using metal parts and changing the size of the backplate in such a way as to defeat the use of any “Glock switch” currently in

existence.<sup>5</sup> As of November 30, 2025, Glock **no longer distributes** earlier models of Glock pistols which were used with switches. <https://soldiersystems.net/2025/10/21/glock-discontinues-multiple-models/> The “V” Series and Gen. 6 models have retained the cruciform structure at the rear of the trigger bar because that structure is essential to Glock’s Safe Action System, as it tensions and releases the striker while providing critical internal safety. The Bill’s ban on the use of a “cruciform trigger bar” **makes these firearms less safe for normal use**. The Bill thus converts a **safety feature** into a banned feature. That is little short of irrational.

In short, the language of the Bill is poorly drafted, hopelessly vague, irrational in its application and vastly overbroad. Such a Bill is a violation of the Due Process Clause of the Fourteenth Amendment and Article 24 of the Maryland Declaration



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of Rights. Article 24 of the Maryland Declaration of Rights prohibits the enactment or enforcement of vague legislation. Under Article 24, “[t]he void-for-vagueness doctrine as applied to the analysis of penal statutes requires that the statute be “sufficiently explicit to inform those who are subject to it what conduct on their part will render them liable to its penalties.” *Galloway v. State*, 365 Md. 599, 614, 781 A.2d 851 (2001). A statute must provide “legally fixed standards and adequate guidelines for police . . . and others whose obligation it is to enforce, apply, and administer [it]” and “must eschew arbitrary enforcement in addition to being intelligible to the reasonable person.” (*Id.* at 615).

Under this test, a statute must be struck down if it is “so broad as to be susceptible to irrational and selective patterns of enforcement.” *Id.* at 616. See also *Pizza di Joey, LLC v. Mayor of Baltimore*, 470 Md. 308, 343-44 (2020). “A statute can be impermissibly vague for either of two independent reasons. First, if it fails to provide people of ordinary intelligence a reasonable opportunity to understand what conduct it prohibits. Second, if it authorizes or even encourages arbitrary and discriminatory enforcement.” *Hill v. Colorado*, 530 U.S. 703, 732 (2000) (citing *Chicago v. Morales*, 527 U.S. 41, 56–57 (1999)). A statute is invalid if it is “so broad as to be susceptible to irrational and selective patterns of enforcement.” *Galloway*, 365 Md. at 616, quoting *Bowers v. State*, 283 Md. 115, 122 (1978). See also *Ashton v. Brown*, 339 Md. 70, 89 (1995); *In Re Leroy T.*, 285 Md. 508 (1979).

Federal constitutional law is in accord. See, e.g., *Giovani Carandola, Ltd. v. Fox*, 470 F.3d 1074, 1079 (4th Cir. 2006) (recognizing that “[a] statute is impermissibly vague if it either (1) fails to provide people of ordinary intelligence a reasonable opportunity to understand what conduct it prohibits or (2) authorizes or even encourages arbitrary and discriminatory enforcement” (internal quotations omitted)). Such a statute need not be vague in all possible applications in order to be void for vagueness under the Due Process Clause. *Johnson v. United States*, 576 U.S. 591, 602 (2015) (“our holdings squarely contradict the theory that a vague provision is constitutional merely because there is some conduct that clearly falls within the provision’s grasp”). And the rule is well established that the government “cannot find clarity in a wholly ambiguous statute simply by relying on the benevolence or good faith of those enforcing it.” *Wollschlaeger v. Governor, Fla.*, 848 F.3d 1293, 1322 (11th Cir. 2017) (en banc). Such statutes are facially invalid. See, e.g. *Posters 'N' Things, Ltd. v. United States*, 511 U.S. 513, 521-22 (1994) (requiring objective standards).

The vagueness of this Bill is made even worse because it affects the Second Amendment right to acquire arms, discussed *infra*. “[P]erhaps the most important factor” in shaping “the clarity that the Constitution demands of a law” is whether the law “threatens to inhibit the exercise of constitutionally protected rights.” *Vill. of Hoffman Ests. v. Flipside, Hoffman Ests., Inc.*, 455 U.S. 489, 498-99 (1982). Just as a law that “interferes with the right of free speech or of association” demands “a more stringent vagueness test,” *id.* at 499, so too does a law that prohibits people from acquiring the arms the Second Amendment entitles the people to keep and bear. Any other conclusion would impermissibly reduce the Second Amendment to

“a second-class right.” *McDonald v. City of Chicago*, 561 U.S. 742, 780 (2010) (plurality opinion). See *NYSRPA v. Bruen*, 597 U.S. 1, 70 (2022) (“The constitutional right to bear arms in public for self-defense is not ‘a second-class right, subject to an entirely different body of rules than the other Bill of Rights guarantees.’”), quoting *McDonald*, 561 U.S. at 780.

The Bill’s flat ban on the manufacture, sale, offer for sale, purchase, receipt or transfer of a “convertible pistol” does not even impose a *mens rea* requirement, which would at least alleviate some of the vagueness concerns. See, e.g., *Gonzales v. Carhart*, 550 U.S. 124, 150 (2007). For example, as written, the Bill would criminalize the mere **temporary** receipt or **temporary** transfer of an ordinary Glock pistol (or other striker-fired pistol) from an existing owner to a third-party (such as a spouse or friend) for use for target practice at a range. And criminal liability could be imposed without regard to whether the temporary transfer and receipt was a knowing or willful violation. See *Chow v. State*, 393 Md. 431 (2006) (defining a “knowing” violation). The same violation would obtain for the sale, transfer or receipt of other types of striker-fired pistols whose trigger bar is later determined to be insufficiently “shielded from interference by a pistol converter” (whatever that means). This Bill thus severely and overzealously criminalizes otherwise innocent conduct.

These concerns are not addressed by the Bill’s provision that the “STATE POLICE MAY ADOPT REGULATIONS TO IMPLEMENT THIS SECTION, INCLUDING PUBLISHING A LIST OF PROHIBITED MACHINE GUN CONVERTIBLE PISTOLS.” First, the provision is **permissive** rather than mandatory. The State Police are free to take a pass on that thankless task. This Bill appears to be modelled on California’s law, Assembly Bill No. 1127, but that legislation at least defines “common household tools” by expressly incorporating a regulatory definition set forth in “Section 4082 of Title 11 of the California Code of Regulations.” California Penal Code § 6885(a). This Bill is devoid of such definitions. Second, the Bill’s language does not give the State Police sufficient guidance for creating such a “list” of banned guns and thus any such “list” could impose the same sort of arbitrary bans noted above. See *Department of Transp. v. Armacost*, 311 Md. 64, 77 (1987) (“The delegation doctrine, prohibiting a legislative body from delegating its law-making function to any other branch of government or entity is a corollary of the separation of powers doctrine which underlies both the Maryland and Federal Constitutions”). The General Assembly must impose “an intelligible principle” in delegating rulemaking authority. *Id.* at 78. Hopelessly vague terms simply do not satisfy that requirement.

### **The Bill Violates the Second Amendment**

The Second Amendment “protects the possession and use of weapons that are ‘in common use.’” *NYSRPA v. Bruen*, 597 U.S. at 1, 21 (2022) (quoting *District of Columbia v. Heller*, 554 U.S. 570, 627 (2008)). Firearms in “common use” cannot be banned. **Again, this Bill effectively bans all striker-fired pistols** either because the pistol uses a cruciform trigger bar (Glock) or because the striker-fired pistol’s **non-**

cruciform trigger bar is insufficiently “shielded” from “interference.” All such pistols banned by this Bill are on the Handgun Roster and are in common use by law-abiding Marylanders. That is undeniable. There is no more class of firearm in “common use” than Glocks and other striker-fired pistols. This Bill would effectively ban these pistols and force Glock and these other manufacturers to abandon the Maryland market. And the only reason for this ban on these otherwise perfectly legal pistols is that criminals are illegally modifying and converting Glock pistols into fully automatic pistols that are illegal to possess, by using illegal devices that are already banned by federal and existing State law. That’s about as rational as banning a street-legal car because it can be illegally converted into illegal dragracer by cutting off the muffler and catalytic converter.

Maryland law makes clear that the manufacturers are not legally responsible for the actions of independent third parties, especially where these third-party actions are illegal and are being committed by third party **criminals**. See, e.g., *Warr v. JMGM Group, LLC*, 433 Md. 170, 183 (2013) (holding that there is no duty to protect the general public from the actions of third parties unless “the person or entity sued had control over the conduct of the third party who caused the harm by virtue of some special relationship”). See also *Valentine v. On Target, Inc.*, 353 Md. 544, 553 (1999) (“One cannot be expected to owe a duty to the world at large to protect it against the actions of third parties, which is why the common law distinguishes different types of relationships when determining if a duty exists.”). The foreseeability of such illegal actions is irrelevant. Maryland “jurisprudence is replete with holdings that, regardless of any foreseeability, a duty does not exist to the general public, with respect to harm caused by a third party, absent the existence of a special relationship between the person sued and the injured party or the person sued and the third party.” *Warr*, 433 Md. at 184. This Bill would impose a radical change on Maryland law.

Banning guns in common use because third parties can make illegal modifications and conversions is a facial violation of the Second Amendment. Specifically, under *Heller*, *McDonald* and *Bruen*, the Second Amendment protects the right of a law-abiding citizen to acquire handguns. That is because the Second Amendment “wouldn’t mean much’ without the ability to acquire arms.” *Nguyen v. Bonta*, 140 F.4th 1237, 1241 (9th Cir. 2025), quoting *Teixeira v. County of Alameda*, 873 F.3d 670, 677 (9th Cir. 2017) (en banc). See also *Reese v. Bureau of Alcohol*, 127 F.4th 583, 590 (5th Cir. 2025) (“Of course, the words ‘purchase,’ ‘sale,’ or similar terms describing a transaction do not appear in the Second Amendment. But the right to ‘keep and bear arms’ surely implies the right to purchase them.”); *Ortega v. Grisham*, 148 F.4th 1134, 1143 (10th Cir. 2025) (same); *Ezell v. City of Chicago*, 651 F.3d 684, 704 (7th Cir. 2011) (same). Under federal and State law, firearms are principally “acquired” from or through manufacturers and dealers. Banning the “sale, purchase, receipt, or transfer” of these so-called convertible pistols violates the rights of Marylanders to purchase these “common use” firearms. If the Bill is enacted into law, it will be challenged. California’s similar law, Assembly Bill 1127, has already been challenged on Second Amendment grounds in federal court in *Jaymes v. Bonta*, No. 3:25-cv-02711 (C.D.Cal.) (filed Oct. 13, 2025). That litigation

is ongoing. The General Assembly should at least wait and see the outcome of that litigation before diving in on this subject.

### **The Bill Imposes Severe Penalties That Are Redundant Of Penalties Already Imposed Under Federal And State Law**

The Bill adds a new section, 4-305.2, to the Criminal Law Article, providing that ON OR AFTER JANUARY 1, 2027, A PERSON MAY NOT MANUFACTURE, SELL, OFFER FOR SALE, PURCHASE, RECEIVE, OR TRANSFER A MACHINE GUN CONVERTIBLE PISTOL. A violation of these provisions is punishable under MD Code, Criminal Law, § 4-306, by 3 years imprisonment or a fine of \$5,000, or both. Any such conviction for this new crime would impose a life-time firearms disqualification under both federal and State law. See 18 U.S.C. § 922(g)(1); 18 U.S.C. §921(a)(20); MD Code, Public Safety, § 5-101(g)(3).

It bears emphasis that federal law makes mere possession of a Glock switch or a conversion device a federal felony. Under the definition of a machinegun in 26 U.S.C. § 5845(b):

The term “machinegun” means any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, **any part** designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and **any combination of parts** from which a machinegun can be assembled if such parts are in the possession or under the control of a person.

(Emphasis added).

As emphasized, this definition expressly includes “any part” used exclusively in a machinegun or any combination of parts that could be used to convert a firearm into a machinegun. That definition includes all conversion devices, including the “PISTOL CONVERTER” addressed by this Bill. See, e.g., *United States v. Bailey*, 123 F.3d 1381, 1389 (11th Cir. 1997) (conviction affirmed for possession of a “drop-in autosear” that could be used to convert a firearm into a M-16 machinegun); *United States v. Cash*, 149 F.3d 706, 707 (7th Cir. 1998) (noting “auto sears are treated as machine guns”).

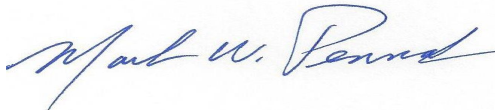
Under federal law, to acquire or possess a machinegun (including parts), the person must first register, undergo an exhaustive background investigation, including fingerprinting by the ATF, and notify local law enforcement officials. See 26 U.S.C. §§ 5811, 5812. See generally 27 C.F.R. § 479.105(b), 27 C.F.R. §§ 479.84, 479.85. No possession is allowed until the ATF has approved the transfer. 26 U.S.C. § 5812(b). The only machineguns (including parts) that may be lawfully possessed by such persons are those manufactured prior to the enactment of the 1986 amendments to the Gun Control Act of 1968. See 18 U.S.C. § 922(o). Such machineguns (and parts)

are now extremely expensive. Possession without complying with these provisions is a serious federal felony under 18 U.S.C. § 922(o) and is punishable by imprisonment for 10 years. See 18 U.S.C. § 924(a)(2). See also 26 U.S.C. § 5861(d) (criminalizing the possession of an unregistered machinegun); 26 U.S.C. § 5871 (punishing a violation of Section 5861(d) by imprisonment for 10 years and a \$10,000 fine).

The mere possession of a switch is likewise severely punished under State law with the enactment of HB 810, 2024 Session Law, Ch. 713. That Bill, as enacted, provides that a person “may not transport, manufacture, possess, sell, offer to sell, transfer, purchase, or receive” any auto-sear as defined in MD Code, Criminal Law, § 4-301(n). A person who is convicted of a violation “is subject to imprisonment not exceeding 3 years or a fine not exceeding \$5,000 or both.” See MD Code, Criminal Law, § 4-306(a). If the person uses the auto-sear in the commission of a felony or a crime of violence, that person, upon conviction, “shall be sentenced” for a first offense “to imprisonment for not less than 5 years and not exceeding 20 years.” *Id.* § 4-306(b). What’s next, capital punishment?

This extreme Bill is poorly drafted, has irrational applications that punish innocent conduct and should die. We urge an unfavorable report.

Sincerely,

A handwritten signature in blue ink that reads "Mark W. Pennak". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Mark W. Pennak  
President, Maryland Shall Issue, Inc.  
[mpennak@marylandshallissue.org](mailto:mpennak@marylandshallissue.org)

MAYOR AND CITY COUNCIL OF  
BALTIMORE,  
City Hall  
100 N. Holliday Street  
Baltimore, Maryland 21202

-and-

THE STATE OF MARYLAND,  
200 St. Paul Place  
Baltimore, Maryland 21202

*Plaintiffs,*

v.

GLOCK, INC.,  
6000 Highlands Pkwy SE  
Smyrna, Georgia 30082

-and-

GLOCK GES.M.B.H.,  
Gaston Glock-Platz 1  
2232 Deutsch-Wagram, Austria

*Defendants.*

IN THE CIRCUIT COURT OF MARYLAND  
FOR BALTIMORE CITY

Civil Action No.:

**COMPLAINT AND  
DEMAND FOR JURY TRIAL**

Plaintiffs, Mayor and City Council of Baltimore (“Baltimore” or “City”) and the State of Maryland (“State”), file this complaint against Defendants, Glock, Inc. and Glock Ges.m.b.H. (together, “Glock”), to hold them accountable for the misconduct alleged below.

#### **SUMMARY OF ACTION**

1. The machine gun, which has been illegal for decades, has returned to the streets of Maryland. Between 2023 and 2024, the City of Baltimore Police Department (“BPD”) recovered at crime scenes and in connection with criminal investigations at least 100 Glock pistols that were

illegally modified to fire fully automatically—that is, to operate like a machine gun. The problem is intensifying: almost *double* the number of illegally modified Glocks were recovered in 2024 than just the year before.

2. These Glock pistols were illegally modified with the insertion of a simple, dime-sized device called an auto sear, a type of machine gun conversion device. Glocks affixed with auto sears (“Modified Glocks”) can fire fully automatically – up to 1,200 rounds per minute, a rate as fast or faster than many fully automatic firearms used by the U.S. military.

3. According to one ATF agent, the use of guns equipped with auto sears is “*one of the scariest things*” the agency has dealt with in decades.<sup>1</sup>

4. In recent years, the practice of installing auto sears on Glock pistols has become so prevalent that auto sears are commonly known as “Glock switches”—“switches” because they allow shooters to toggle between semiautomatic and fully automatic firing modes.

5. This is a problem that Glock can solve, but it has chosen not to. The features of Glock’s pistol design that make it especially susceptible to modification can be easily altered to prevent that modification.

6. Instead of taking reasonable action to address the problem, Glock has made the reprehensible business decision to continue profiting from the sales of its easily modifiable guns to the civilian market. As a result, Glock harms the health and safety of the residents of Baltimore and Maryland and increases and exacerbates the injuries, death, and fear from gun violence and the proliferation of illegal machine guns.

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<sup>1</sup> Alain Stephens & Keegan Hamilton, *The Return of the Machine Gun*, THE TRACE (Mar. 24, 2022), <https://www.thetrace.org/2022/03/auto-sear-gun-chip-glock-switch-automatic-conversion> (emphasis added) [<https://perma.cc/3MPK-WE5S>].

7. Glock bears legal responsibility for its role in this escalating public health and safety crisis in Baltimore and Maryland. Glock created a pistol designed to accommodate semiautomatic or automatic firing, knew that the semiautomatic version could be easily modified with an auto sear by civilians to fire fully automatically in violation of U.S. laws, promoted the fully automatic capabilities of the design, and continues to sell the pistol even as the illegal conversion of those pistols to fully automatic fire has become rampant and continues to severely and negatively impact public safety in Baltimore, elsewhere in Maryland, and across the United States.

8. By facilitating the proliferation of illegal machine guns in this way and failing to implement reasonable controls to combat the unlawful possession, alteration, and use of its semiautomatic pistols, Glock has knowingly harmed Marylanders, particularly in Baltimore and among the City's and State's youth.

9. Modified Glocks have caused terror throughout Baltimore and elsewhere in the State: they have been recovered in connection with carjackings, illegal drug sales, traffic violations, and violent crimes.

10. For example, on September 14, 2024, a man and woman were standing in Harbor East, a tourist destination in Baltimore, when multiple people emerged from a nearby vehicle and attempted to rob the man. He resisted, and the assailants shot him multiple times, killing him. The woman suffered a graze wound to the leg. A nearby occupied car was hit with multiple stray bullets. "It was definitely, definitely terrifying," said a witness, who was in the area and ran after

hearing what the witness described as automatic gunfire.<sup>2</sup> A 19-year-old was arrested, and a Modified Glock was recovered in connection with this homicide.

11. The increased danger and reduced public safety from Modified Glockes also directly affect law enforcement. For instance, on June 29, 2023, near Patterson Park, as a BPD officer approached a suspect wanted on a warrant, the suspect opened machine-gun fire with a Modified Glock affixed with a drum magazine, hitting the officer's vehicle. Additional officers arrived and exchanged further rounds of gunfire with the suspect, who wielded both the Modified Glock and an assault rifle during the shootout. The officers ultimately killed the suspect. A total of 33 casings from the suspect's weapons were found and an additional revolver, magazines, and ammunition were found in the suspect's backpack.

12. And in a shocking statistic reflecting the impact on Baltimore's teenagers, approximately half of the individuals arrested by BPD in connection with incidents involving Modified Glockes were under the age of 21. For example, on September 30, 2023, BPD officers recovered a Modified Glock affixed with an illegal large capacity magazine holding 21 live rounds of ammunition, within about one hundred yards of Walter P. Carter Elementary and Middle School. The possessor of the Modified Glock was 16 years old. And on October 5, 2024, officers recovered a Modified Glock from a 16-year-old after nurses found it on him while treating him at a hospital for injuries sustained in a motorcycle accident.

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<sup>2</sup> @FOXBaltimore, *Baltimore Police Identify Victim in Late-Night Harbor East Shooting*, YOUTUBE (Sept. 16, 2024), <https://www.youtube.com/watch?v=IXGpNulONwI&t=3s>.

13. As one law-enforcement official explained, those with modified handguns “think it’s cool, they think it looks cools, sounds cool, they want to brag about having it. Makes them seem more deadly.”<sup>3</sup>

14. While Baltimore and other places in Maryland have long struggled with an epidemic of gun violence, it is unquestionable that the ease of modification of Glocks and the resulting prevalence of Modified Glocks have made the situation worse. Those armed with Modified Glocks are emboldened because of their military-grade firepower. In addition, they kill and injure more people, increasing the terror felt by ordinary residents, and imperil law enforcement.

15. By choosing to continue to sell and market its easily modified pistols to Maryland civilians and refusing to implement simple changes to its pistol design, Glock has violated state law by knowingly creating, maintaining, and contributing to harm to the public through its unreasonable conduct and by failing to establish and implement reasonable controls regarding the pistols it sells in Maryland. *See* MD. CODE, CTS. & JUD. PROC. § 3-2302.

16. Through this lawsuit, Plaintiffs seek an order enjoining Glock from continuing to sell its easily modifiable pistols to civilian residents of Maryland. Plaintiffs also seek relief in the form of restitution and abatement of the harm that Glock has knowingly and foreseeably caused to the public in Baltimore and Maryland.<sup>4</sup>

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<sup>3</sup> Jeremy Harris, *Illegal ‘Glock Switch’ Blamed for Increase of Rounds Being Fired in Western Washington Shootings*, KPIC (Oct. 7, 2023, 11:02 AM), <https://kpic.com/news/local/illegal-glock-switch-blamed-for-increase-bullets-rounds-fired-in-western-washington-shootings-ghost-guns-atf-machine-gun-gun-violence-crime-firearms-law-enforcement-police-seattle-spd-chief-adrian-diaz-investigations> [<https://perma.cc/7B4S-KPJ5>].

<sup>4</sup> For the avoidance of doubt, Plaintiffs do not seek any relief based on or with the purpose of stopping the sales of Glock pistols to law enforcement. Unlike typical civilians, some law enforcement officers may legally carry fully automatic weapons under certain circumstances.

## **JURISDICTION AND VENUE**

17. This Court has subject matter jurisdiction by grant of authority under the Constitution of the State of Maryland.

18. The Court has personal jurisdiction over Defendants under the long-arm statute of the State of Maryland, MD. CODE, CTS. & JUD. PROC. § 6-103, and the United States Constitution, because this cause of action arises from Defendants' business activities and tortious injury in Maryland, and Defendants have regularly transacted business in Maryland, have purposefully directed business activities to Maryland, and have engaged in unlawful practices and caused tortious injury in Maryland.

19. Venue is proper in this Court because Plaintiffs' claims arise in part in the City of Baltimore, Defendants transact business in Baltimore, and under MD. CODE, CTS. & JUD. PROC. § 6-202(3).

## **PARTIES**

20. Plaintiff the Mayor and City Council of Baltimore is a municipal corporation organized and operating under the Baltimore City Charter and the laws of the State of Maryland. Baltimore is also known as "City of Baltimore" or "Baltimore City."

21. Plaintiff the State of Maryland brings this action by and through Attorney General Anthony G. Brown, who is the chief legal officer for the State. The Attorney General has general charge, supervision, and direction of the State's legal business, and acts as legal advisor and representative of all major agencies, boards, commissions, and official institutions of state government. The Attorney General's powers and duties include acting on behalf of the State and

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*See* 18 U.S.C. § 922(o)(2)(A). This lawsuit is focused exclusively on Glock's sales to the civilian market in Maryland.

the people of Maryland in the State and federal courts on matters of public concern. Under the Constitution of Maryland, and as directed by the Governor, the Attorney General has the authority to file this suit for violations of State laws that threaten the public interest and welfare of Maryland residents. MD. CONST. art. V, § 3(a)(2).

22. Plaintiffs, by and through the Baltimore City Solicitor and the Attorney General of Maryland, are authorized to bring these claims under MD. CODE, CTS. & JUD. PRO. § 3-2503 (“Gun Industry Accountability Act” or “Act”).

23. Defendant Glock, Inc. is a firearm manufacturer, dealer, and importer located in Smyrna, Georgia. It is incorporated under the laws of the State of Georgia as a domestic for-profit corporation with its principal place of business at 6000 Highlands Parkway SE, Smyrna, Georgia, 30082. Since 1990, Glock, Inc. has been registered to do business in Maryland. Glock, Inc. is currently owned by two Austrian companies, each of which hold half of its stock: Glock Ges.m.b.H. and INC Holding GmbH. Glock, Inc. is the exclusive distributor of Glock pistols in the United States, including Maryland.

24. Defendant Glock Ges.m.b.H. is an Austrian limited liability company that designs, manufactures, assembles, markets, advertises, and distributes Glock pistols and the component parts used to make those pistols and exports them into the United States.

25. The connection between Glock, Inc. and Glock Ges.m.b.H. is extremely close, with overlapping corporate officers and Glock Ges.m.b.H. maintaining significant involvement in the production and marketing of Glock pistols in the United States. Together, Glock Ges.m.b.H. and Glock, Inc. oversee, create, and implement the design, manufacture, and assembly of Glock pistols sold in the United States, including Maryland.

26. Glock, Inc. and Glock Ges.m.b.H. are also directly and materially involved in the sale, distribution, and promotion of Glock pistols for civilians in every state, including those residing in Maryland. Glock Ges.m.b.H. markets Glock pistols in Maryland through Glock, Inc., its sole importer and distributor in the United States, and an expansive regional and local dealer network. These dealers are contractually obligated not only to sell and service Glock pistols in Maryland but also to advise Maryland customers regarding the operation, handling, features, and benefits of Glock pistols. Every Maryland customer receives an owner’s manual, published by Glock Ges.m.b.H., in which Glock Ges.m.b.H acknowledges: “GLOCK pistols are sold in all states.” Operating through Glock, Inc. and the U.S. dealer network, Glock Ges.m.b.H. knowingly markets through a distributor and established channels to provide regular advice to customers in Maryland, and thus places its handgun products into the stream of commerce, with the intention that those products reach Maryland civilians.

27. Glock Ges.m.b.H.’s facility in Deutsch-Wagram, Austria is the “center for the company’s multifaceted operations.”<sup>5</sup> For many years, Glock Ges.m.b.H. manufactured all Glock handguns that were sold in the United States. In 2013, Glock, Inc. began to manufacture handguns in the United States using component parts supplied by Glock Ges.m.b.H. from Austria. Public reporting from recent years indicates that Glock Ges.m.b.H. continues to manufacture the majority of Glock handguns and handgun parts sold in the United States.<sup>6</sup> Glock Ges.m.b.H. controls the design and production standards used in Glock, Inc.’s assembly facilities in the United States.

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<sup>5</sup> Glenn Adam Kendrick, *Glock International, a Global Symphony of Excellence*, GLOCK ANN. 85 (2024), <https://www.scribd.com/document/783913670/Glock-Annual-2024> [<https://perma.cc/V4UX-8VXV>].

<sup>6</sup> Charlie Gao, *Made in America: Why Glock Manufacturing Is Set to Grow in the United States*, THE NAT’L INT. (Aug. 6, 2021), <https://nationalinterest.org/blog/reboot/made-america-why-glock-manufacturing-set-grow-united-states-191274> [<https://perma.cc/V3L5-ZYDE>].

According to Glock Ges.m.b.H.'s website, Glock, Inc.'s U.S. facility "follows [the] same production standards and procedures as the facilities in Austria."<sup>7</sup> Glock's annual magazine even refers to Glock, Inc. as Glock's "U.S. Headquarters."<sup>8</sup>

## FACTS

### A. Glock Pistols are Easy and Inexpensive to Modify into Illegal Machine Guns with Auto Sear

28. Glock pistols are frequently recovered in connection with crime in Baltimore, elsewhere in Maryland, and nationwide. In 2023, Glock manufactured the firearms most frequently recovered in connection with crime in Baltimore.<sup>9</sup> Nationwide, from 2022 to 2023, Glock manufactured the crime gun most frequently traced by ATF.<sup>10</sup>

29. The ease with which Glock pistols can be converted into machine guns makes them especially popular in the criminal market. Due to this attribute of Glock pistols and Glock's failure to correct the problem, longstanding federal and state prohibitions on possessing fully automatic machine guns can be easily circumvented.

30. Machine guns, or fully automatic weapons, have been heavily regulated at the federal level since the 1930s because of their frequent use in crime, their increasing use in deadly

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<sup>7</sup> *Glock - The Company*, GLOCK, <https://eu.glock.com/en/Explore-GLOCK/GLOCK-Company> [<https://perma.cc/T5G4-JST6>] (last visited Feb. 6, 2025).

<sup>8</sup> Chris Eger, *A Misconception Became the Icon*, GLOCK ANN. 36-37 (2023), <https://us.glock.com/-/media/Global/US/old/US-Site/83-Downloadable-Materials/2023/2023-Glock-Annual.ashx>.

<sup>9</sup> EVERYTOWN RSCH. & POL'Y, WHO IS MANUFACTURING THE GUNS USED IN CRIMES? (2024), <https://everytownresearch.org/report/city-level-data-crime-gun-recoveries/>.

<sup>10</sup> *Crime Gun Tracing Updates and New Analysis* at 22, in *National Firearms Commerce and Tracking Assessment: Protecting America From Trafficked Firearms*, U.S. DEP'T OF JUST., ATF (Jan. 8, 2025), <https://www.atf.gov/firearms/docs/report/nfcta-volume-iv-part-iii-%E2%80%93-crime-gun-tracing-updates-and-new-analysis/download> [<https://perma.cc/BH2A-TM8M>].

shootings and massacres,<sup>11</sup> and the “immense danger” their rapid-fire capability poses to the public.<sup>12</sup> Early machine guns made their first appearance during the Civil War and grew more powerful in the following decades.<sup>13</sup> By the First World War, British troops facing machine gun fire “fell by the thousands in every attack.”<sup>14</sup> But in the late 1920s and early 1930s, criminals began arming themselves with machine guns, and they moved from the battlefield to city streets. The first known use of a machine gun in an attack by a criminal gang was in 1925, in Chicago, and machine guns quickly became the must-have weapon for the likes of Al Capone, Bugs Moran, and Pretty Boy Floyd.<sup>15</sup> A crime reporter during that time called machine guns, “[t]he greatest aid to bigger and better business the criminal has discovered in this generation . . . a diabolical machine of death . . . the highest-powered instrument of destruction that has yet been placed at the convenience of the criminal element . . . .”<sup>16</sup>

31. Following the dramatic uptick of gang-related machine-gun violence of the 1920s and early 1930s, Maryland was one of many states that passed legislation strictly regulating possession and use of machine guns. *See* MD. CODE, CRIM. LAW §§ 4-404, 4-405. Maryland law defines “machine gun” as “a loaded or unloaded weapon that is capable of automatically discharging more than one shot or bullet from a magazine by a single function of the firing device.” *Id.* § 4-401(c).

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<sup>11</sup> *National Firearms Act*, BUREAU OF ALCOHOL, TOBACCO, FIREARMS & EXPLOSIVES (last reviewed Apr. 7, 2020), <https://www.atf.gov/rules-and-regulations/national-firearms-act> [<https://perma.cc/XT95-NVB7>].

<sup>12</sup> *See United States v. O’Brien*, 560 U.S. 218, 230 (2010).

<sup>13</sup> *See generally* JOHN ELLIS, *THE SOCIAL HISTORY OF THE MACHINE GUN* 21-45 (1986).

<sup>14</sup> *Id.* at 141.

<sup>15</sup> *See id.* at 152-54, 157-58.

<sup>16</sup> *Id.* at 152.

32. Congress quickly followed suit, regulating machine guns in 1934. Federal law mandates that machine guns and certain other weapons may be made, sold, and possessed only subject to strict regulation and registration requirements. It bans the sale of machine guns to members of the public and to any person except those specifically authorized by the Attorney General of the United States, and it also prohibits the transfer and possession of them, except in limited circumstances. 18 U.S.C. § 922(b)(4), (o).

33. Given the onerous restrictions on the sale and ownership of machine guns, fully automatic weapons are difficult to acquire. Semiautomatic weapons—like most Glock pistols—are not. Those seeking the power and lethality of a fully automatic weapon have increasingly looked to readily available, easily modifiable semiautomatic weapons to get the firepower and destructive force that they desire. In recent years, auto sears have made this search significantly easier.

34. Auto sears are add-ons used to convert semiautomatic guns into fully automatic weapons. “Auto sear” is short for “automatic sear,” so named because the small device overtakes the sear of a firearm, which is the part of the trigger mechanism that holds the striker back. Once the sear is overtaken, the striker can continue firing with just one trigger pull. In other words, a gun with an auto sear installed fires fully automatically because the modified gun will continue firing as long as the trigger is pulled and there is ammunition in the magazine.

35. Decades ago, the ATF determined that auto sears themselves are “machineguns” as defined under federal law.<sup>17</sup>

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<sup>17</sup> See *ATF Ruling 81-4*, BUREAU OF ALCOHOL, TOBACCO, FIREARMS & EXPLOSIVES, <https://www.atf.gov/resource-center/docs/atf-ruling-81-4pdf/download> [<https://perma.cc/8S3E-WAP8>] (determining that an auto sear qualifies as a “combination of parts designed and intended for use in converting a weapon into a machinegun” under 26 U.S.C. § 5845(b)) (last visited Feb. 7, 2025).

36. At the state level, Maryland specifically prohibits the possession, sale, or transfer of switches or auto-sears. MD. CODE, CRIM. LAW §§ 4-301(m)-(n), 4-305.1.

37. Auto sears are cheap and easy to acquire. They can be purchased for as little as \$20.<sup>18</sup> Many auto sears are made in China and falsely marketed online as household or recreational products. Once imported illegally to the United States, they are sold within the criminal gun market. These overseas auto sear manufacturers often quickly dissolve to avoid investigation or legal action, with new ones emerging to replace them.<sup>19</sup> Most auto sears that originate in the United States are produced using 3D printers and are often created using downloadable blueprints that are readily available. In light of these commonly used methods for obtaining auto sears, they are difficult to intercept and eradicate.<sup>20</sup>

38. Glock-style auto sears, which look like “very small Lego piece[s],”<sup>21</sup> can be attached to the back of pistols, as seen in the image of a Modified Glock below.

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<sup>18</sup> Julia Rothman & Shaina Feinberg, *This \$20 Device Turns a Handgun Into an Automatic Weapon*, N.Y. TIMES (July 1, 2022), <https://www.nytimes.com/2022/07/01/business/auto-sear-handgun-automatic.html>.

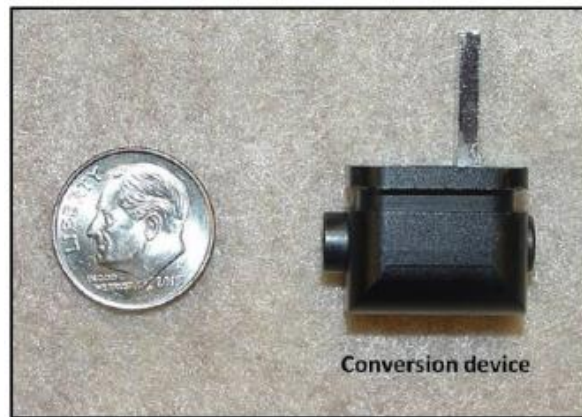
<sup>19</sup> Frank Main, Tom Schuba, Matt Kiefer & Cheryl W. Thompson, *In Chicago, Handguns Turned Into High-Capacity Machine Guns Fuel Deadly Violence*, NPR (Oct. 28, 2022), <https://www.npr.org/2022/10/28/1131026241/chicago-handgun-violence-auto-sear-machine-gun> [<https://perma.cc/2DVS-LQWT>].

<sup>20</sup> Lee O. Sanderlin, *Baltimore has a machine gun problem*, BALTIMORE BANNER (Mar. 18, 2024 5:30 AM), <https://www.thebaltimorebanner.com/community/criminal-justice/baltimore-glock-switch-machine-gun-atf-MGDVWUJDEVDGHAGKZFPLMXB3CI/> [<https://perma.cc/BA5D-SY9G>].

<sup>21</sup> Rothman & Feinberg, *supra* note 18.



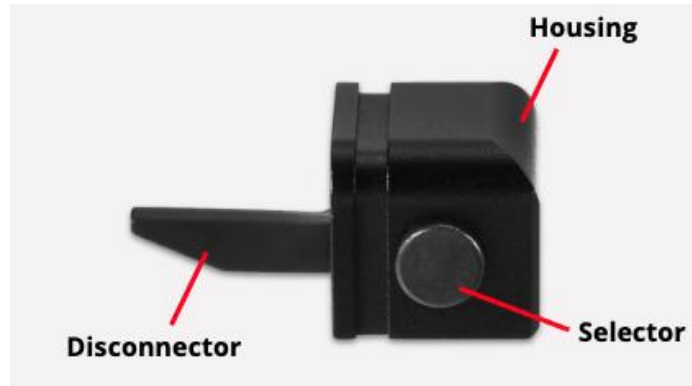
39. These auto sears are roughly the size of a dime.<sup>22</sup>



40. The auto sear has a small protrusion called a “disconnecter” that, once installed, pushes a Glock pistol’s internal trigger bar down, allowing the striker to continue firing as the slide reciprocates with recoil. The ability to fire continuously, without the shooter having to pull and release the trigger repeatedly, allows for a much faster rate of fire.

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<sup>22</sup> Bureau of Alcohol, Tobacco, Firearms and Explosives, ATF Firearms & Ammunition Technology Division Technical Bulletin 17-04 (2017), *United States v. Freitas*, No. 20-cr-223 (N.D. Cal. May 29, 2020), ECF No. 42, Ex. 5.



41. Most Glock-style auto sears come with round “selectors” that allow the user to toggle between semiautomatic and fully automatic modes. Other versions convert Glock pistols to fire only fully automatically when installed.

42. It is well known that Glock pistols are particularly easy to modify for fully automatic firing with auto sears. This is in sharp contrast to most other pistols, which do not accept auto sears as easily, such as those produced by Smith & Wesson or Sig Sauer, and instead require time-consuming and difficult engineering beyond the capabilities of most civilians to be modified into automatic weapons.

43. For Glock’s Generation 1 through 4 pistols (“Gen1” through “Gen4”), which have been produced since Glock’s entry into the U.S. market in or around late 1985 or early 1986, installing an auto sear involves using a common household tool to merely slide out the rear removable plastic backplate of the gun’s slide and placing the auto sear into the backplate’s position. The process typically takes less than five minutes with instructions readily available

online.<sup>23</sup> Glock continues to sell Gen3 and Gen4 pistols to civilian consumers in the United States, including civilian consumers in Maryland.<sup>24</sup>

44. Glock’s Generation 5 (“Gen5”) line of pistols, which entered the market in 2017, requires minor filing or clipping of a small *plastic* notch before an auto sear may be affixed. Like the other models, the conversion of a Glock Gen5 pistol can be done in a matter of minutes with minimal modification to the firearm. Videos available online explain the simple process. For example, one online video with over 720,000 views provides step-by-step instructions on how to modify a Gen5 pistol in mere minutes while noting that they “only had to take that little notch off,” which “wasn’t that big of a deal.”<sup>25</sup> Glock sells Gen5 pistols to civilian consumers in the United States, including civilian consumers who reside in Maryland. Glock knew that its addition of a small plastic piece on the back of the gun was neither a reasonable nor bona fide solution to the

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<sup>23</sup> See, e.g., @Letreactcom, *How to Install Glock Full Auto Switch*, FACEBOOK (June 21, 2022, 1:29 AM), <https://www.facebook.com/100063815394590/videos/how-to-install-glock-full-auto-switch/1185300678678624>; @Knifehomes, *How to Install Glock Full Auto Switch*, FACEBOOK (Apr. 17, 2021, 3:12 AM), <https://www.facebook.com/kniveshomes/videos/how-to-install-glock-full-auto-switch/227916132441449>.

<sup>24</sup> Glock’s website allows users to view all of Glock’s pistols available for purchase. See *GLOCK Pistols*, GLOCK, <https://us.glock.com/en/Pistols> [<https://perma.cc/R74M-PY4C>] (last visited Feb. 5, 2025). The website allows users to filter the pistols available for purchase, including the ability to select “Gen3” and “Gen4” models. *Id.* (click “Add/Edit Filters”; then under “All features”; select “Gen3” and “Gen4”; then click “DONE”). After applying the Gen3 and Gen4 filters, a user can see all of the Gen3 and Gen4 pistols that Glock sells and which of those pistols are only available for purchase by law enforcement. Glock offers multiple Gen3 and Gen4 models for civilians, including four different 9x19mm pistols: the G17, G19, G26, and G34. See *id.*; see also *G17*, GLOCK, <https://us.glock.com/en/pistols/g17> [<https://perma.cc/U7PF-94RS>] (last visited Feb. 5, 2025); *G19*, GLOCK, <https://us.glock.com/en/pistols/g19> [<https://perma.cc/6NLT-9J6B>] (last visited Feb. 5, 2025); *G26*, GLOCK, <https://us.glock.com/en/pistols/g26> [<https://perma.cc/5J6K-YUYU>] (last visited Feb. 5, 2025); *G34*, GLOCK, <https://us.glock.com/en/pistols/g34> [<https://perma.cc/D5XB-UP7C>] (last visited Feb. 5, 2025).

<sup>25</sup> @Royalrangeusa, *Full Auto Glock 17 GEN5!!!*, YOUTUBE (Aug. 30, 2017), <https://www.youtube.com/watch?v=JSIX0HsczlY>.

easy modification of its guns into illegal machine guns; that piece can be filed down easily with a simple tool.

45. Glock switches are so strongly associated with Glock handguns that some auto-sear manufacturers print Glock logos on their switches, even though Glock does not manufacture them and has had its logo trademarked since 1986.<sup>26</sup> (See images below.)



46. Anyone with internet access and a means to pay can easily purchase auto sears online via popular social media platforms<sup>27</sup> and can learn how to install them with the help of online tutorials such as the ones described in paragraphs 43 and 44 above. Frequently, these posts and videos refer specifically to converting Glock pistols into automatic weapons.<sup>28</sup>

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<sup>26</sup> Dan Zimmerman, *VIDEO: Young Teens Show Off Their Illegal GLOCK Full-Auto Switches*, THE TRUTH ABOUT GUNS (Sept. 29, 2022), <https://www.thetruthaboutguns.com/video-young-teens-show-off-their-illegal-glock-full-auto-switches/> [<https://perma.cc/T6V4-N27J>]; Peter Yankowski, *More 'Switches' that Convert Weapons into Machine Guns Turning Up in CT, Police Say*, CT INSIDER (Sept. 12, 2022), <https://www.ctinsider.com/news/article/More-switches-that-convert-weapons-into-17435267.php#photo-22917218>; *Glock—Trademark Details*, JUSTIA TRADEMARKS, <https://trademarks.justia.com/734/83/glock-73483803.html> [<https://perma.cc/A7JJ-2T9X>] (last visited Jan. 7, 2025).

<sup>27</sup> Chris Hrapsky, *Glock Switch Creator Would 'Rather Invent Any Other Thing' in Wake of Unintended Consequences*, KARE 11 (Feb. 7, 2024, 10:31 PM), <https://www.kare11.com/article/news/local/kare11-extras/dangers-of-the-controversial-glock-switch-as-told-by-its-inventor/89-9fd2745b-4616-4f8e-b993-3a7249d10f85> [<https://perma.cc/FP37-Z4GZ>].

<sup>28</sup> See, e.g., *supra* notes 23, 25.

47. A Modified Glock pistol can reportedly fire up to 1,200 rounds per minute—a faster rate of fire than the standard M4 machine gun used by the United States military.<sup>29</sup> In a recent federal complaint filed against an accused auto sear trafficker, the defendant bragged that his auto sears were compatible with a Gen5 Glock and could make it fire “30 rounds in two seconds.”<sup>30</sup>

48. Glock pistols affixed with a switch are also more difficult to control—resulting in a greater risk of bodily harm or death to bystanders. An untrained shooter using an unmodified semiautomatic Glock may already have a difficult time maintaining the gun’s recoil to stay on target while firing. That problem is exponentially greater when firing a Modified Glock. It is much more difficult for shooters to manage a Modified Glock’s recoil and maintain their target when firing so many rounds in rapid succession, resulting in more lethal shootings, grievous wounds for survivors, and greatly enhanced risks for bystanders and law enforcement.

49. “They tend to spray and pray,” as one ATF Special Agent characterized a person firing a handgun modified with a switch.<sup>31</sup> “Those rounds can go anywhere.”<sup>32</sup>

#### **B. Glock Has Known for Decades that Its Easily Modifiable Pistols Pose a Unique Danger**

50. Glock has known for decades that its semiautomatic pistols can be easily modified to fire fully automatically. In fact, it designed its pistol to accommodate semiautomatic or

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<sup>29</sup> Press Release, U.S. Att’y’s Off., N. Dist. of Texas, Fort Worth Manufacturer Charged in Glock Switch Case (Nov. 18, 2022), <https://www.justice.gov/usao-ndtx/pr/fort-worth-manufacturer-charged-glock-switch-case> [<https://perma.cc/B35Z-4AXG>].

<sup>30</sup> Aff. ¶ 7, *United States v. Hendrie*, No. 23-MJ-4115 (W.D.N.Y. July 20, 2023), ECF No. 1.

<sup>31</sup> Hunter Sáenz, *Authorities Raise Alarm on Device that Turns Handguns into Automatic Weapons*, WSOC-TV (Feb. 20, 2023), <https://www.wsoc.com/news/local/authorities-raise-alarm-device-that-turns-handguns-into-automatic-weapons/MH3SRDJ2MVHW7FMNA6K674UHVM/> [<https://perma.cc/C77D-75LL>].

<sup>32</sup> *Id.*

automatic fire capabilities, leaving its semiautomatic pistol exceedingly susceptible to modification.

51. Most Glock pistols share the same basic design, whether they are semiautomatic pistols or fully automatic pistols. Even to the plain eye, the designs of the G17 (Glock’s semi-automatic pistol) and the G18 (the automatic pistol) are strikingly similar.



52. Glock has been marketing its G17 semiautomatic pistols to U.S. civilians since the mid-1980s.

53. Glock also manufactures, markets, and sells the G18 fully automatic version of its pistol to authorized European customers, which is a limited group of purchasers.

54. Glock markets the G18 as having “the same characteristics like other previous models and the frame size of the service pistol classic G17.”<sup>33</sup> On information and belief, Glock did not apply for a separate patent for the fully automatic G18 because it fell within the original design of the patented Glock 17.<sup>34</sup> The G18 contains two internal alterations that function like

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<sup>33</sup> *G18*, GLOCK, <https://eu.glock.com/en/products/pistols/g18> [<https://perma.cc/X8H5-WBWX>] (last visited Feb. 7, 2025).

<sup>34</sup> See U.S. Patent No. 4,539,889 (filed Apr. 29, 1982).

attachable auto sears do on a semiautomatic Glock; indeed, the patent for the Glock-specific auto sear describes its operation in near-identical terms to those used by Glock to describe the G18.<sup>35</sup>

55. As early as the late 1980s, Gaston Glock, the founder of Glock Ges.m.b.H., met with the inventor of the “Fire Selector System,” a type of auto sear designed and patented especially for use with Glock pistols.<sup>36</sup> At that meeting, Gaston Glock test-fired a semiautomatic Glock pistol equipped with an auto sear, which he had affixed to the pistol after removing its back plate. Gaston Glock thus knew that Glock pistols could be easily converted to automatic weapons, and it was obvious that this posed a danger.<sup>37</sup> Indeed, by this time, Glock had already created the G18.

56. Like with Modified Glocks, it is difficult to control the G18 in full-auto mode. “Skill and training are crucial for maintaining accuracy” when shooting the G18.<sup>38</sup>

57. As Gaston Glock knew and expected, it was not long before civilians began illegally modifying semiautomatic Glocks to automatic machine guns. And Glock has long been on notice of this alarming trend. For example, more than 20 years ago, an ATF investigation resulted in dozens of arrests and the seizure of seven converted Glock pistols and nine Glock switches.<sup>39</sup> More recently, on April 11, 2022, 41 members of Congress published a letter

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<sup>35</sup> Compare U.S. Patent No. 5,705,763 (filed July 18, 1996), with G18, GLOCK, <https://eu.glock.com/en/products/pistols/g18> [<https://perma.cc/X8H5-WBWX>] (last visited Feb. 7, 2025) (describing “fire selector” “switch” to “full-automatic firing mode”).

<sup>36</sup> Hrapsky, *supra* note 27.

<sup>37</sup> *Id.*

<sup>38</sup> Nick Oetken, *What’s Inside a Glock 18 Pistol?*, GUNZONE (Feb. 17, 2024), <https://thegunzone.com/whats-inside-a-glock-18-pistol/> [<https://perma.cc/27MR-X5TE>].

<sup>39</sup> *Internet Arms Trafficking*, BUREAU OF ALCOHOL, TOBACCO, FIREARMS & EXPLOSIVES, <https://www.atf.gov/our-history/internet-arms-trafficking> [<https://perma.cc/8WWJ-8QUZ>] (last updated May 15, 2020).

highlighting the increased use of auto sears in shootings nationwide, specifically identifying only Glock-made pistols by name.<sup>40</sup> And federal officials have contacted Glock directly searching for ways to address the problem.<sup>41</sup>

58. Actions by Glock customers also alerted Glock to the reality that its semiautomatic pistols were being easily modified. For example, customers would mail their illegal Glock switches to Glock's Smyrna headquarters requesting repairs.<sup>42</sup> Rather than issuing clarifying warnings to the public or changing the design of their pistols, Glock continued to sell its easily modifiable pistols to civilians, including Marylanders.

59. Even further, Glock clearly had notice about the proliferation of Modified Glocks and their danger based on countless high-profile prosecutions, news articles, and public events.

For example:

- a) The 2019 murder of four family members who had gathered to watch football in a backyard in Fresno, California.<sup>43</sup>

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<sup>40</sup> Letter from Lizzie Fletcher et al., H.R., to Marvin Richardson, Acting Dir., Bureau of Alcohol, Tobacco, Firearms & Explosives (Apr. 11, 2022), [https://carbajal.house.gov/uploadedfiles/2022-04-11\\_letter\\_to\\_atf\\_on\\_auto\\_sears\\_final\\_copy.pdf](https://carbajal.house.gov/uploadedfiles/2022-04-11_letter_to_atf_on_auto_sears_final_copy.pdf) [<https://perma.cc/EMP6-2ARZ>].

<sup>41</sup> Ernesto Londoño & Glenn Thrush, *Inexpensive Add-on Spawns a New Era of Machine Guns*, N.Y. Times (Aug. 12, 2023), <https://www.nytimes.com/2023/08/12/us/guns-switch-devices.html>.

<sup>42</sup> Chip Brownlee, *ATF Director Urges Action on Auto Sears 'Flooding Our Communities'*, THE TRACE (Mar. 1, 2023), <https://www.thetrace.org/2023/03/atf-auto-sears-dettelbach-machine-gun/> [<https://perma.cc/K8MV-T8ZB>].

<sup>43</sup> Stephens & Hamilton, *supra* note 1.

- b) The 2021 murder of a Houston police officer,<sup>44</sup> followed four months later by the shooting of three more Houston police officers.<sup>45</sup>
- c) The 2021 discovery of a Modified Glock hidden in the home of a self-described incel in Ohio, who was “plotting to massacre sorority members” at a local university.<sup>46</sup>
- d) A 2022 mass shooting in Sacramento, California that resulted in the death of six people, including three innocent bystanders, and that wounded twelve others.<sup>47</sup>
- e) A 2022 New Year’s Eve shooting in Mobile, Alabama that killed one person and wounded eight others, just blocks away from where more than 12,000 people were attending a New Year’s Eve celebration.<sup>48</sup>
- f) The 2023 recovery from an 18-year-old gang member of a Modified Glock that was used in a shooting of three people, firing a total of 28 rounds, near a public housing complex in Newark, New Jersey.<sup>49</sup>

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<sup>44</sup> Miya Shay, *Bodycam Video of Shootout that Killed Officer Shows Suspect Used Illegally Modified Gun, Police Say*, ABC (Oct. 12, 2021), <https://abc7.com/houston-police-shooting-bodycam-video-deon-ledet-william-bill-jeffrey/11118603/> [<https://perma.cc/EY7G-KDB3>]; HOUSTON POLICE DEPARTMENT MUSEUM, LOCAL HEROES WHO PAID THE ULTIMATE SACRIFICE: HOUSTON POLICE OFFICERS KILLED IN THE LINE OF DUTY 124 (June 2023), [https://www.houstontx.gov/police/museum/ultimate\\_sacrifice\\_book.pdf](https://www.houstontx.gov/police/museum/ultimate_sacrifice_book.pdf) [<https://perma.cc/ZQ42-WJCG>].

<sup>45</sup> Joel Eisenbaum, *HPD Shootout: Illegally Modified Gun Used to Injure 3 HPD Officers Shoots 50 Rounds in 5 Seconds*, CLICK2HOUSTON (Jan. 28, 2022), <https://www.click2houston.com/news/local/2022/01/29/hpd-shootout-illegally-modified-gun-used-to-injure-3-hpd-officers-shoots-50-rounds-in-5-seconds/> [<https://perma.cc/A6HE-JLY6>].

<sup>46</sup> Stephens & Hamilton, *supra* note 1.

<sup>47</sup> Sam Stanton, *Three Charged with Murder in Connection with Sacramento Mass Shooting. Here’s What We Know*, THE SACRAMENTO BEE (May 3, 2022), <https://www.sacbee.com/news/local/crime/article261026102.html> [<https://perma.cc/HQM5-64DW>].

<sup>48</sup> WKRG, *Modified Glock Used During New Year’s Eve Deadly Shooting in Downtown Mobile: Police*, YOUTUBE (Jan 2, 2023), <https://www.youtube.com/watch?v=pClxv7NV7wg>.

<sup>49</sup> Press Release, United States Attorney’s Office for the District of New Jersey, Member and Associate of Newark Street Gang Charged with Unlawful Possession of Machinegun used in Shooting of Three People (Apr. 13, 2023), <https://www.justice.gov/usao-nj/pr/member-and-associate-newark-street-gang-charged-unlawful-possession-machinegun-used> [<https://perma.cc/E4UW-MU36>]; see also Criminal Complaint, *United States v. Muhammad*, No. 23-16048 (D.N.J. Apr. 13, 2023).

- g) A 2024 mass shooting at a SEPTA bus stop in Philadelphia, Pennsylvania that injured eight high schoolers, including one 16-year-old who was shot nine times.<sup>50</sup>
- h) The 2024 murder of an 18-year-old by another 18-year-old, after one asked the other to leave a house party in Surprise, Arizona.<sup>51</sup>
- i) A 2024 high-speed chase that started in Charles County and ended in Prince George’s County, Maryland, and resulted in the recovery of two stolen cars, stolen property, and a Modified Glock.<sup>52</sup>
- j) A 2024 mass shooting during the Tuskegee University homecoming celebration that killed one person and injured sixteen people, in which a Modified Glock was confirmed to be used.<sup>53</sup>

60. Despite this troubling reality regarding the use of Modified Glockes, Glock continues to actively promote its fully automatic pistol. An internet search for “Glock fully automatic” (and variations) or “Glock Full Auto Switch,” which has been among the most popular firearm-related internet search terms in the United States in recent years,<sup>54</sup> yields as

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<sup>50</sup> NBC 10 Staff, *Final Suspect Arrested in Shooting Near SEPTA Bus that Injured 8 Students*, NBC10 PHILADELPHIA (Mar. 21, 2024, 5:29 PM), <https://www.nbcphiladelphia.com/news/local/teenage-suspect-arrested-in-shooting-near-septa-bus-that-injured-8-students/3807218/> [https://perma.cc/S56V-SW4H].

<sup>51</sup> Perry Vandell, *‘I Had to Shoot’: Surprise Man Faces Second-Degree Murder Charge After House Party Shooting*, AZ CENTRAL (July 10, 2024, 6:54PM), <https://www.azcentral.com/story/news/local/surprise/2024/07/10/surprise-man-faces-second-degree-murder-charge-after-house-party-shooting/74360663007/> [https://perma.cc/D5KL-LG2B].

<sup>52</sup> *Charles County Officers Catch Theft Suspects, Recover Modified Glock and Stolen Property*, S. MD. NEWS NET (Oct. 17, 2024), <https://smnewsnet.com/archives/539628/charles-county-officers-catch-theft-suspects-recover-modified-glock-and-stolen-property/> [https://perma.cc/4L46-QHMS].

<sup>53</sup> Carol Robinson, *Man Arrested in Tuskegee Shooting Admits Firing Gun with Glock Switch, Denies Shooting Anyone, Records State*, AL.COM (Nov. 19, 2024, 5:18 PM), <https://www.al.com/news/2024/11/man-arrested-in-tuskegee-shooting-admits-firing-gun-with-glock-switch-denies-shooting-anyone-records-state.html>.

<sup>54</sup> See ATF, NATIONAL FIREARMS COMMERCE AND TRACKING ASSESSMENT: FIREARMS IN COMMERCE 37 (May 5, 2022), <https://www.atf.gov/firearms/docs/report/national-firearms-commerce-and-trafficking-assessment-firearms-commerce-volume/download> [https://perma.cc/8SSP-FTP2].

one of the top search results a link to Glock’s EU website, which markets the “[f]ully automatic 9mm firepower” G18.<sup>55</sup> U.S. consumers searching for how to get a fully automatic Glock will be directed to Glock’s EU website, where Glock touts its capacity to fire “20 rounds per second” (or 1,200 rounds per minute) and explains that it is the original Glock pistol with a simple modification of a “fire selector” “switch.”<sup>56</sup> In marketing the fully automatic capabilities of the G18, Glock fails to disclose that fully automatic Glock pistols are highly dangerous and illegal for civilians in the United States, and that semiautomatic Glocks should never be modified to be fully automatic, like their advertised product—the G18.

61. Customers associate Glock switches with the Glock brand so closely that they tag Glock’s social media accounts in posts about Glock switches, which Glock then displays on its own Facebook page—furthering and facilitating the association between Glock pistols and switches.<sup>57</sup> In addition, in response to Glock’s posts on in its Facebook page, customers have commented about fully automatic fire capabilities—again furthering the association.

62. The following is a sampling of Glock switch-related content that can currently be found on Glock’s Facebook page:

- a) A 2015 post by Glock asked users “What do you like most about the design of your GLOCK?” One user commented with an emoji, “you can make with the cool accesorries [sic] full auto the Glock pistol.”
- b) A 2015 video of a man shooting a Modified Glock with large capacity magazines features a man boasting that he can shoot “twelve hundred rounds a minute,” with

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<sup>55</sup> *G18*, GLOCK, <https://eu.glock.com/en/products/pistols/g18> [<https://perma.cc/X8H5-WBWX>] (last visited Feb. 6, 2025) (emphasis in original).

<sup>56</sup> *Id.*

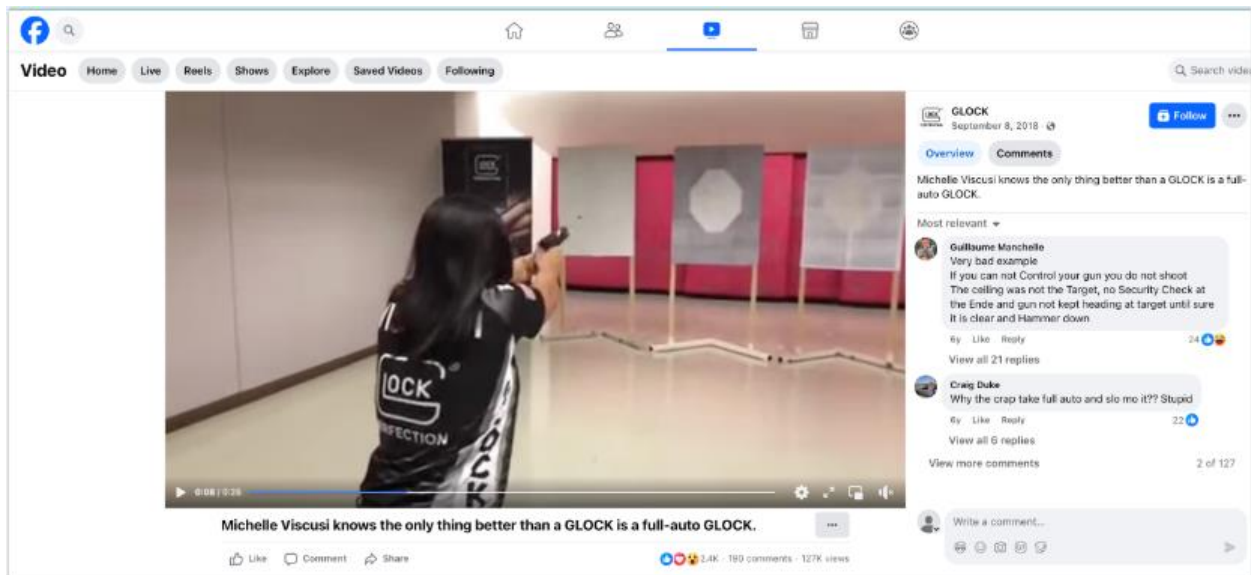
<sup>57</sup> When third parties post content and tag Glock, that content is displayed in Glock’s social media account because Glock has set its Facebook page to display third-party content in which Glock is tagged.

the caption, “MUST WATCH! – Check out this guy burning through some ammo with a full-auto GLOCK!” This video has around 12,000 views.

- c) A 2016 post by Glock “[c]alling all GLOCK Enthusiasts and Photographers” to “submit your own GLOCK photo using #MyGLOCK for a chance to be featured in our official 2017 Calendar.” One user submitted a photo of what appeared to be Modified Glock with a collapsible shoulder stock and the caption “#MYGLOCK My fathers [sic] full auto Glock 19.”
- d) A 2020 post by Glock of someone gripping a Glock pistol with a target in its sights, with the caption “The view that beats all others” and an emoji. One user commented, “I don’t know, I don’t see a ‘fun switch’ on the back of it, and no night sights so . . . There’s definitely better views. Just saying.”
- e) A 2021 post with emojis that reads, “I want a switch so bad and a 100 round clip” and shares a July 2017 video of a person shooting a Modified Glock with the caption, in Spanish, “[d]isparando una Glock 17 en modo FULL AUTO con balas explosivas . . . simplemente impresionante!” In English, the caption reads, “shooting a Glock 17 in FULL AUTO mode with explosive bullets . . . simply awesome!”

63. Rather than hiding or deleting comments about illegal modifications from its page or removing the “tag,” which connects Glock’s account to this content, Glock continues to allow Modified Glocks to be promoted on its social media.

64. In addition to maintaining posts and comments about illegal Modified Glocks on its social media pages that continue to be available to this day, and despite the inherent dangerousness of fully automatic firing by civilians, Glock also maintains social medial posts promoting the fully automatic capability of its G18 pistol to this day. For example, Glock promoted the use of the G18 in full-auto mode as “more fun” and “better” than semi-automatic firing on its Instagram and Facebook pages.



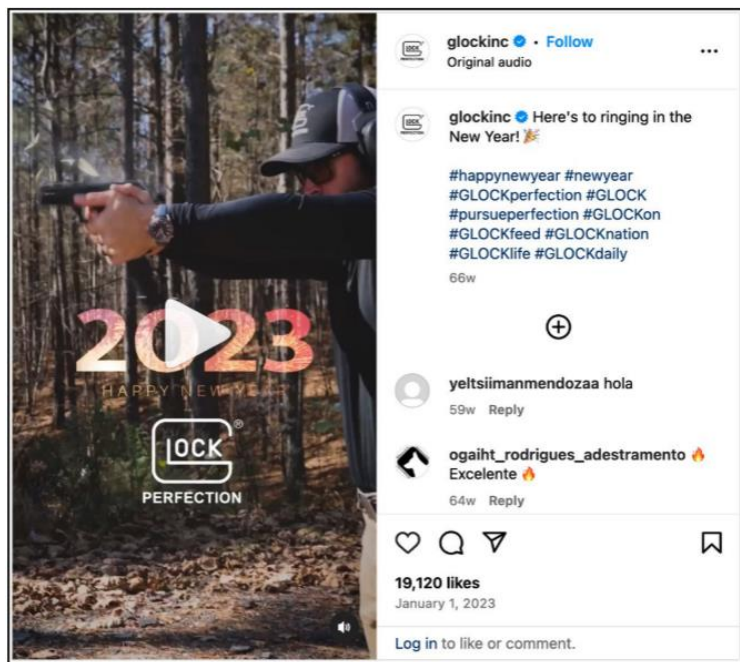
65. In another post, Glock advertised the G18 and a variant, the Glock 18C, and encouraged customers to “Double your pleasure. Double your fun,” while using the hashtag “#fullauto.” Glock did so without any disclaimer that these fully automatic handguns are not available to civilians in the United States, despite commenters indicating on the post “I’m looking for a glock18c” and “É essa que quero,” which means, “That’s the one I want” in Portuguese.



66. In the 2015 Facebook post mentioned above, Glock asked users ‘What do you like most about the design of your GLOCK?’ One user commented “I love glock 18c rate of fire and just everything,” despite the fact that this model is not available to the general public.

67. One user commented on a 2022 Glock Facebook post promoting Glock’s presence at the upcoming Shot Show saying, “Send me a Glock 18 please and thank you.” Another user commented “I got mine here” and included a Facebook link, and a third user commented, “inbox me if interested in that Glock 18 bro.”

68. In yet another Instagram post, celebrating the 2023 New Year, Glock posted a video of someone firing Glock handguns both semiautomatically and fully automatically. The post contains no disclaimers that American civilians cannot typically purchase a fully automatic Glock handgun.



69. At its Smyrna headquarters, Glock offers opportunities for some members of the public to learn how to fire a G18 at its range. In a YouTube video discussing one such course, a Glock Rangemaster points to the fully automatic toggle on the G18 and says, “Here’s the, what we call the ‘fun switch,’ that’s one of the names for it.”<sup>58</sup>

### C. Glock Still Has Not Fixed the Problem

70. Despite its knowledge of the proliferation of Modified Glockes, Glock has made the unconscionable business decision to not take meaningful or effective action to prevent, discourage, or limit the illegal modification of its pistols. To the contrary, Glock has promoted fully automatic fire in the pursuit of profits.

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<sup>58</sup> TFB TV, *The Full Auto Glock 18C Machine Pistol*, YOUTUBE (Aug. 17, 2017), <https://www.youtube.com/watch?v=cc4ZTIsusTQ&rc=1>.

71. Glock has been contacted by news outlets regarding whether the company plans to take action to prevent the easy convertibility of its guns to fully automatic fire.<sup>59</sup> Glock has either remained silent in response or sought to cast blame elsewhere. In recent years, Glock even claimed that “the design of the pistol cannot be altered” to make it harder to modify to a machine gun.<sup>60</sup>

72. This, however, is false. The design of Glock pistols *can* be changed in multiple ways, including internal as well as external changes, to make it much more difficult for them to be modified into illegal fully automatic machine guns.

73. Such changes can be made without impairing the guns’ safety or functionality or making them too expensive. For example, a former Glock armorer suggested that an easy fix would involve securing the backplate to the rear of the slide so that it could not be easily removed and replaced with an auto sear.<sup>61</sup> Alternatively, the current configuration of the Glock could be altered so that a user could not so easily access the sear and trigger bar, or so that any modification would defeat the trigger mechanisms and therefore stop the gun from firing.

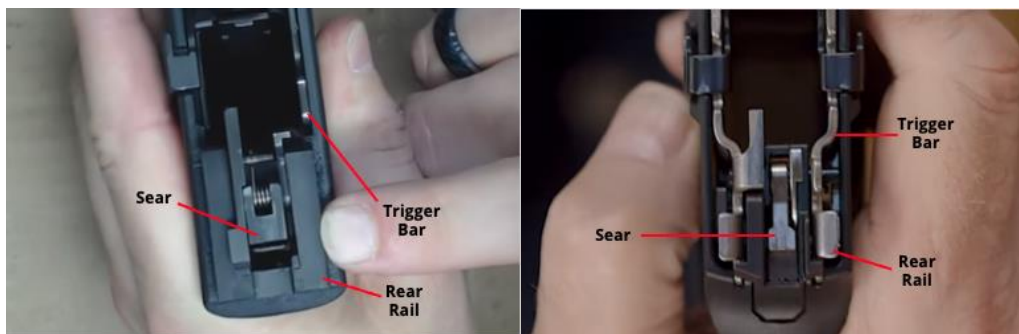
74. Unlike Glocks, most other striker-fired pistols (such as those made by Smith & Wesson, Sig Sauer, Springfield Armory, or Walther Arms), which are sold in Maryland, contain separate “trigger bars” and “sears”—two key components—and those components are separated from the back of the pistol by a “rear rail.” This “rear rail” blocks the exact location where the “disconnecter” of an auto sear would otherwise go.

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<sup>59</sup> See, e.g., Matt Caron, *Glock Switches Turning Up More and More at Local Shooting Crime Scenes*, FOX61 (Nov 7, 2022), <https://www.fox61.com/article/news/crime/glock-switches-connecticut-police-increase/520-8ce4912a-da29-4d61-9260-1f51bf8aa4b8> [<https://perma.cc/287C-EUS8>]; Stephens & Hamilton, *supra* note 1.

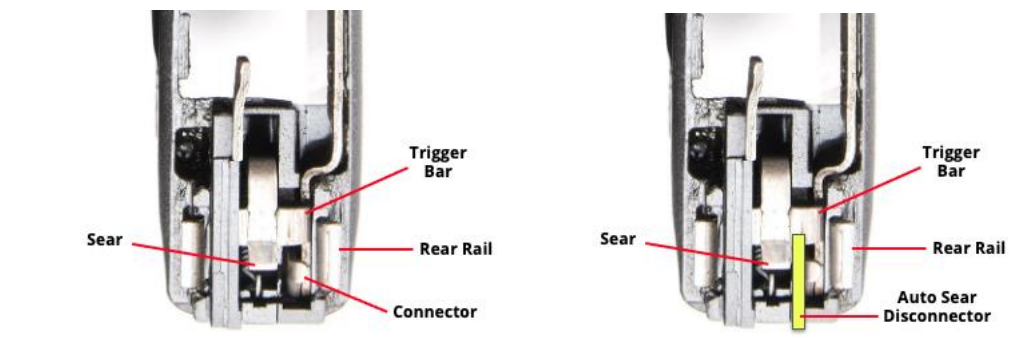
<sup>60</sup> Londoño & Thrush, *supra* note 41.

<sup>61</sup> Champe Barton, *Glock Could Make It Harder to Outfit Its Pistols with Switches – For a Price*, THE TRACE (Sep. 4, 2024), <https://www.thetrace.org/2024/09/glock-switch-lawsuits-pistol-design/> [<https://perma.cc/J3YS-W7GD>].



*On the left, a Springfield XD; on the right, a Sig Sauer P320*

75. However, in a Glock pistol, the trigger bar and the sear are combined as one piece, creating a relatively large surface area for an auto sear's disconnecter to target. In addition, nothing shields the large cross-shaped portion of the trigger bar from the back of the pistol, making it possible for an auto sear's disconnecter to slide between the sear and another component, the connector, to contact the trigger bar and push it downward so that the Glock can continue firing with only one pull of the trigger.



*Images showing the back end of a Glock pistol with and without an auto sear disconnecter*

76. Glock has already designed a pistol that is not easily susceptible to the use of switches: its model G46 semi-automatic pistol. The G46 features a striker that is affixed to the backplate. As a result, the backplate cannot be replaced with an auto sear as easily. Glock has made the decision to sell the G46 only to limited law-enforcement units in Europe, however, and does not market or sell this model to the U.S. civilian market.

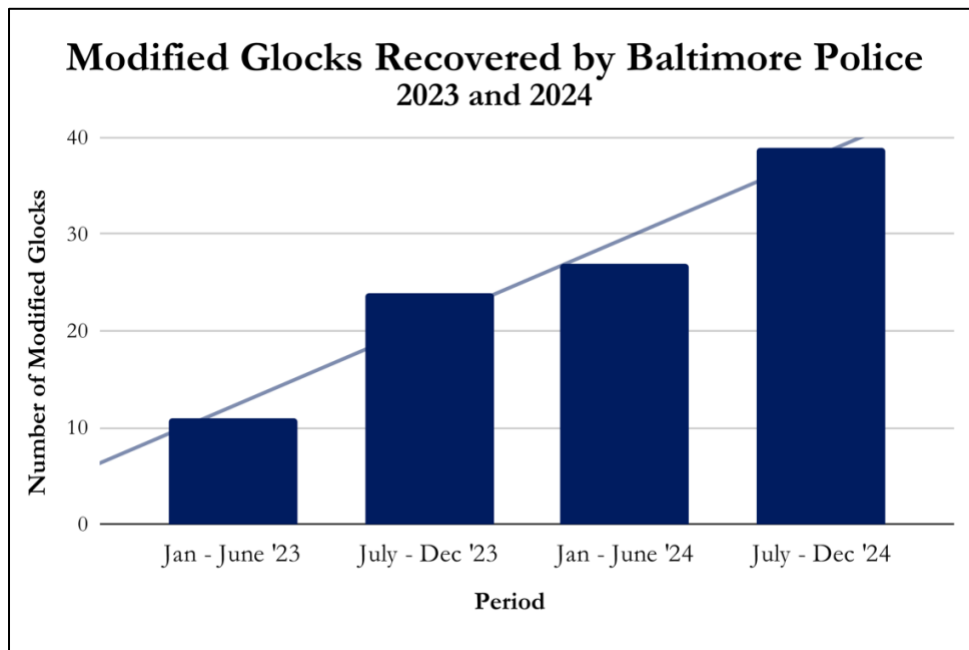
77. Glock’s unreasonable practices of selling and marketing pistols that can be easily modified to illegal machine guns contribute to the harm to the public in Baltimore and in other areas of Maryland. By refusing to take reasonable steps to reduce the unique susceptibility of its pistols to easy and illegal conversion, in order to sell more guns, Glock is profiting by making the City and the State less safe.

**D. Modified Glocks Have Become Increasingly Prevalent and Popular, Especially Among Youth in Baltimore, With Devastating Consequences in Maryland**

78. The ease with which Glocks can be modified has had a detrimental impact on public health and safety in Baltimore and elsewhere in Maryland.

79. In Baltimore, the problem of Modified Glocks is worsening. In 2023, BPD recovered approximately 35 Modified Glocks. And in 2024, BPD recovered at least 65.

80. The increasing rate of recovery of Modified Glocks by BPD—as reflected in the chart included below—demonstrates that they are growing in popularity and use in Baltimore:



81. Because the statistics reported above reflect only BPD recoveries of Glocks affixed with auto sears for a two-year period, they significantly undercount the number of such Glocks

that are currently in circulation in Baltimore. Many Modified Glocks believed to have been used in crimes have not been recovered.

82. The use and possession of Modified Glocks terrorize the public. For example, the vast majority of incidents with Modified Glocks in Baltimore take place in public areas, including near churches, schools, universities, strip malls, restaurants, bars, child-care centers, libraries, parks, recreation centers, playgrounds, basketball courts, sidewalks, highways, and gas stations.

83. A chilling aspect of this surge in handguns-turned-machine-guns is its relationship to minors. In Maryland, only those 21 years of age and older can lawfully possess a handgun. MD. CODE, PUB. SAFETY §§ 5-101(r)(1), 5-133(d), 5-134(b)(1). Despite this restriction, about half of those individuals arrested by BPD in connection with incidents involving Modified Glocks since the beginning of 2023 were under the age of 21—including one 13-year-old, who BPD arrested after finding a Modified Glock and drum magazine on his bed while executing a search warrant.

84. For example, on September 2, 2024, police pursued a car that ran a stop sign then took off. The officers suspected that the vehicle was stolen due to a broken rear window, and dispatch confirmed that the vehicle tag was flagged as stolen. At one point, the car sped along on the wrong side of the road. Two 17-year-old boys then got out of the car and fled on foot while holding their waistbands. In a subsequent struggle between an officer and one of the suspects, both fell to the ground, and the suspect dropped his handgun and continued to try to reach for it over the officer's objections. The boy was later apprehended, and police recovered a Modified Glock with an illegal large capacity magazine. And, on August 21, 2024, in the Cherry Hill Public Housing Complex, officers spotted a 17-year-old boy riding a moped at a high speed that had no stickers or plates. Police later confirmed that the moped had been stolen. While attempting to evade the police, the boy crashed the moped and fled on foot. While in pursuit, officers noticed a

heavy object in his jacket pocket. Police apprehended the boy and recovered a Modified Glock with an illegal large capacity magazine.

85. According to law enforcement, the increase in youth possession and use of Modified Glock is attributable, in part, to fully automatic pistols being seen by teenagers as “status symbol[s] that provide[ ] a competitive advantage.”<sup>62</sup>

86. Modified Glock is so ubiquitous that they are commonly referenced in popular media. For example:

- a) The phrase “Glock Full Auto Switch” has been among the most frequent firearm-related internet search terms in the United States in recent years.<sup>63</sup>
- b) There is a Wikipedia page devoted to the term “Glock Switch.”<sup>64</sup>
- c) The 2022 song “Jimmy Cooks” by Drake featuring 21 Savage—which debuted at #1 on the U.S. Billboard Hot 100<sup>65</sup> and has been streamed more than one billion times on Spotify<sup>66</sup>—includes the lyric: “This Glock .45 came with a switch.”<sup>67</sup>

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<sup>62</sup> Londoño & Thrush, *supra* note 41.

<sup>63</sup> U.S. DEP’T OF JUST., ATF, NATIONAL FIREARMS COMMERCE AND TRACKING ASSESSMENT: FIREARMS IN COMMERCE 37 (May 5, 2022), available at <https://www.atf.gov/firearms/docs/report/national-firearms-commerce-and-trafficking-assessment-firearms-commerce-volume/download> [<https://perma.cc/8SSP-FTP2>].

<sup>64</sup> *Glock Switch*, WIKIPEDIA, [https://en.wikipedia.org/wiki/Glock\\_switch](https://en.wikipedia.org/wiki/Glock_switch) [<https://perma.cc/6PHP-AUK7>] (last visited Feb. 5, 2025).

<sup>65</sup> Gary Trust, *Drake & 21 Savage’s ‘Jimmy Cooks’ Soars in at No. 1 on Billboard Hot 100*, BILLBOARD (June 27, 2022), <https://www.billboard.com/music/chart-beat/drake-21-savage-jimmy-cooks-number-1-hot-100-1235106933> [<https://perma.cc/79EV-VM9V>].

<sup>66</sup> Drake, *Jimmy Cooks (feat. 21 Savage)*, SPOTIFY, <https://open.spotify.com/track/3F5CgOj3wFIRv51JsHbxhe> (last visited Feb. 5, 2025) (showing 1,114,070,178 unique streams).

<sup>67</sup> Rania Aniftos, *Here Are the Lyrics to Drake’s ‘Jimmy Cooks’ Feat. 21 Savage*, BILLBOARD (July 6, 2022), <https://www.billboard.com/music/lyrics/drake-21-savage-jimmy-cooks-lyrics-1235111311> [<https://perma.cc/KU52-PSYE>].

- d) Glock switches and Modified Glocks even appear in popular video games like Roblox.<sup>68</sup> Roblox has a significant number of under 13-year-old users. In 2023, Roblox averaged 68.4 million daily active users, 81% were under 25 years old and 42% were under 13 years old.<sup>69</sup>

87. The increased prevalence and popularity of Modified Glocks is not surprising. As has been studied, gun violence is a contagious social phenomenon apparent among youth.<sup>70</sup> Certain “rules” develop within communities that “govern how disputes are settled, when and where firearms are used, and the significance of firearms within a broad adolescent culture.”<sup>71</sup> Guns and gun violence can play a role in developing one’s social identity.<sup>72</sup> “Projecting the ‘right image’ may have consequences for personal safety, social acceptance, and self-esteem among individuals.”<sup>73</sup>

88. As Modified Glocks have become more prominent, the “rules” of gun use have shifted. Modified Glocks as a “status symbol” and “competitive advantage” have raised the stakes of gun-related violence in Baltimore and Maryland.

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<sup>68</sup> @Lack77, *I Upgraded My GLOCK SWITCH in My New Roblox Hood Game .. (CONSOLE SUPPORT)*, YOUTUBE (Dec. 5, 2023), <https://www.youtube.com/watch?v=SbNCihco14c>; @OldGioAccount, *Glock Switch Review*, YOUTUBE (Mar. 10, 2022), <https://www.youtube.com/watch?v=zSTC40kUwRY>.

<sup>69</sup> Roblox Corp., Form 10-K United State Securities and Exchange Commission 9 (2024) in Roblox Corporation 2024 Proxy Statement and 2023 Annual Report (May 30, 2024 8:00 AM), [https://s27.q4cdn.com/984876518/files/doc\\_financials/2023/ar/roblox-2024-proxy-and-2023-annual-report.pdf](https://s27.q4cdn.com/984876518/files/doc_financials/2023/ar/roblox-2024-proxy-and-2023-annual-report.pdf) [<https://perma.cc/8NW5-99VA>].

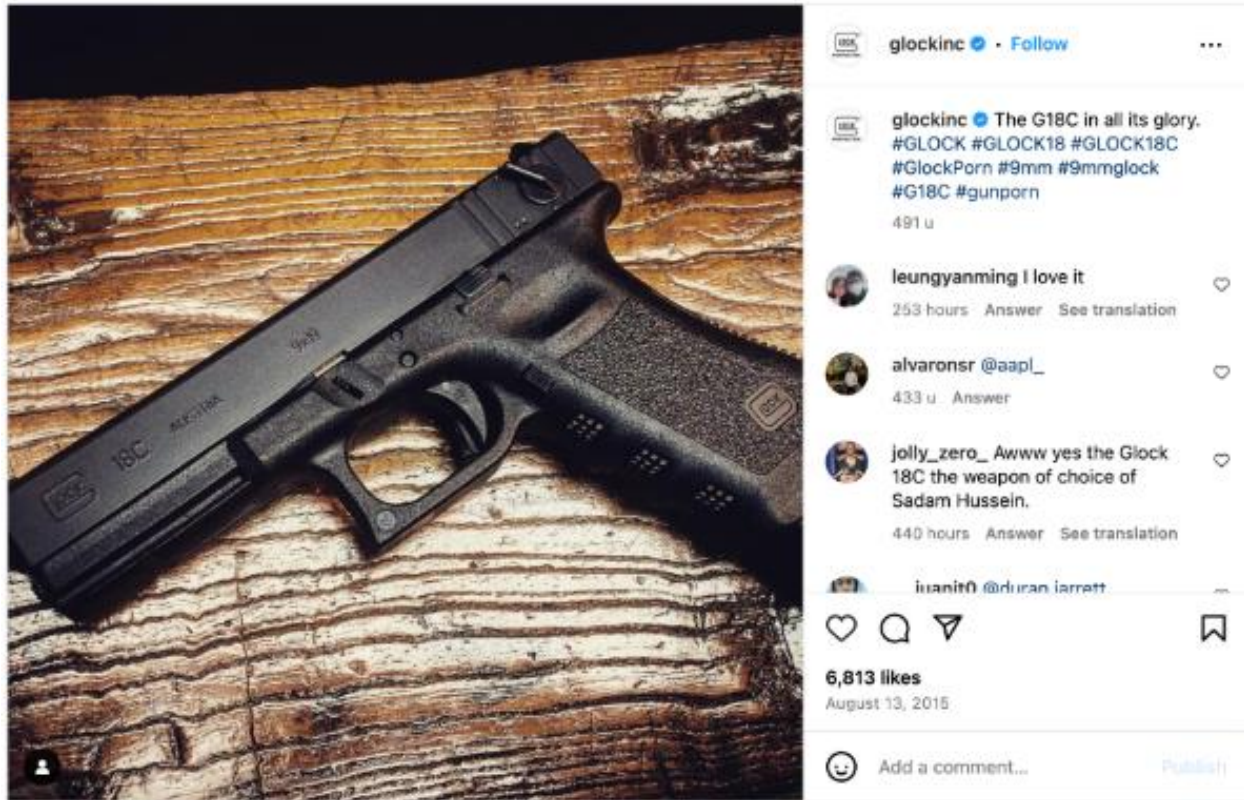
<sup>70</sup> See Andrew V. Papachristos et al., *Tragic, But Not Random: The Social Contagion of Nonfatal Gunshot Injuries*, 125 SOCIAL SCI. & MED. 139, 144, 148 (2015); see also Andrew V. Papachristos et al., *Social Networks and the Risk of Gunshot Injury*, 89 J. URB. HEALTH 992, 993 (2012) (explaining “the risk of gunshot victimization is related to one’s social network” in part because “the normative conditions surrounding gun use are transmitted through processes of peer influence”).

<sup>71</sup> Jeffrey Fagan & Deanna L. Wilkinson, *Guns, Youth Violence, and Social Identity in Inner Cities*, 24 CRIME & JUST. 105, 124 (1998).

<sup>72</sup> *Id.* at 148-49.

<sup>73</sup> *Id.* at 149.

89. Glock’s marketing, which portrays automatic fire as “fun,”<sup>74</sup> a way to celebrate a special occasion,<sup>75</sup> and even used the hashtag “GlockPorn” or “gunporn” to promote its G18 fully automatic pistol (see below), reinforces the “status” associated with illegal Modified Glocks.



90. Glock switches have significantly changed the terrain of gun violence, increasing its lethality. As one seller said, “if you don’t have one, you butt naked.”<sup>76</sup> As an ATF Special Agent put it, “Do you want to bring a semi-automatic pistol to a machine gun fight? . . . It’s like taking a knife to a gunfight.”<sup>77</sup>

<sup>74</sup> See *supra* ¶¶ 64-69.

<sup>75</sup> See *supra* ¶ 68.

<sup>76</sup> @ViceNews, *This Is the World’s Smallest Machine Gun, and It’s Suddenly Everywhere*, YOUTUBE (Mar. 24, 2022), [https://www.youtube.com/watch?v=UHK2\\_SGRFQU&rc=1](https://www.youtube.com/watch?v=UHK2_SGRFQU&rc=1).

<sup>77</sup> Sanderlin, *supra* note 20.

91. According to members of the Baltimore Mayor’s Office of Neighborhood Safety and Engagement, the increase in Baltimore youths with Glock switches and Modified Glocks is tied to the proliferation of switches in Baltimorean culture and increasingly violent social networks. With respect to the former, youth are influenced by local rappers and influencers showing off their switches on social media, motivated by the social capital associated with switches, and driven to possess switches for their ability to increase lethality without requiring adept accuracy.

92. As mentioned, local Baltimore rappers reference switches and Modified Glocks in their lyrics. For example:

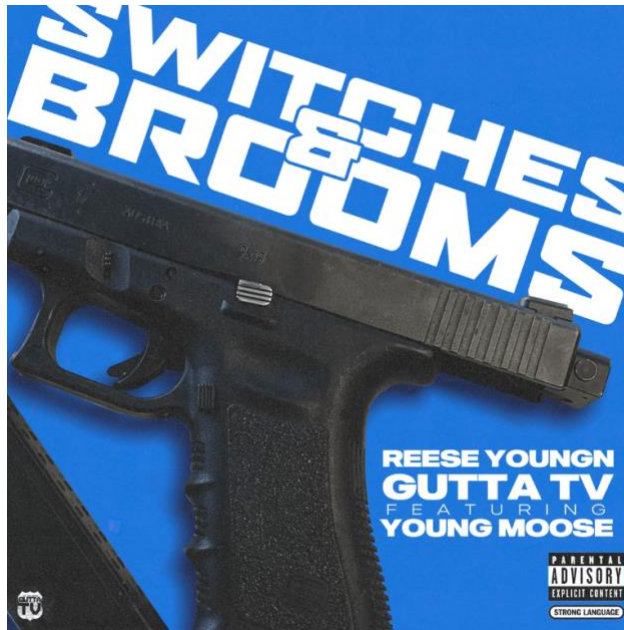
- a) In 2021, Baltimore rapper LBG Muk put out a song with the repeated line “100s & 50s Glocks & Switches, surrounded by violence in my city” with over 55,000 views on YouTube.<sup>78</sup>
- b) Baltimore rapper OGJohnGotti, featuring Baltimore rapper Young Moose, put out the 2024 song “No Luv In The Jungle,” with over 260,000 views on YouTube, featuring the lyric: “Button on my Glock, went from a standard to an automatic.”<sup>79</sup>
- c) Young Moose is featured on the 2024 song “Switches and Brooms,” in which he raps “Lil’ bro said he need a button, I told him hold this.” “Button” is another term for a “switch.” The cover art for the single, below, depicts a Modified Glock.<sup>80</sup>

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<sup>78</sup> @LBG Muk – Topic, *100s & 50s Glocks & Switches*, YOUTUBE (Nov. 19, 2021), <https://www.youtube.com/watch?v=lfq5G4dAO8I>.

<sup>79</sup> @OGJohnGotti, *No Luv in The Jungle ft. Young Moose*, YOUTUBE (June 11, 2024), <https://www.youtube.com/watch?v=Ah8OHQjxJC4>.

<sup>80</sup> @Reese Youngn – Topic, *Switches and Brooms*, YOUTUBE (Aug. 27, 2024), <https://www.youtube.com/watch?v=7xMRBBGxQ5Y>.



93. Modified Glocks harm communities in Baltimore and elsewhere in Maryland, and youth feel the adverse impacts acutely. Glock has profited from and worsened these cycles of violence, fueling enthusiasm for Modified Glocks through its marketing, continuing to sell easily modifiable semiautomatic pistols to Marylanders, and taking no meaningful steps to address the widespread problem.

94. Just a sampling of the incidents of Modified Glocks being used in Baltimore and elsewhere in Maryland illustrates the enormity of the problem.

95. Modified Glocks have been recovered in connection with violent crimes in and around Baltimore. For example:

- a) On December 4, 2023, a 21-year-old man was approached by three men in ski masks with handguns. According to the victim, the masked men forced him into his own car, hit him across his head with handguns, and zip-tied him. After driving him around, they switched cars and were found by police in Rosemont. A Modified Glock with an illegal large capacity magazine was recovered in connection with this incident.
- b) On January 5, 2024, a 20-year-old man was shot in an alley by a 17-year-old. According to the victim, the 17-year-old had approached him and asked for money,

which led to a physical altercation and resulted in the 20-year-old being shot in the chest. A Modified Glock was recovered in connection with this incident.

- c) On March 20, 2024, two shootings occurred within a short period of time on the same block in the Mondawmin neighborhood. The first victim, a 21-year-old, was shot in his right thigh as a result of multiple bullets being fired after he tried to wrest a gun from a person attending a house party. The other victim, a 25-year-old, was walking with his girlfriend on the same block, when a man tried to rob him with a firearm. They struggled and the gun fired. The victim described the gun as having an illegal large capacity magazine and shooting rapid-fire as though it was fully automatic. That victim sustained five gunshot wounds. Officers recovered a Modified Glock, two projectiles, an illegal large capacity magazine, seven shell casings, and another modified weapon in connection with these events.
  - d) On March 28, 2024, a shooting took place within blocks of a Baltimore YMCA. A 42-year-old victim was backing into a parking spot, planning to stop at a store on her way into work, when she heard gunshots. She was shot and her car sustained eighteen bullet holes from the gunfire. Two other cars were also shot. At least 41 spent shell casings were recovered. An officer that was nearby at the time of the shooting saw a car speeding away from the area, going the wrong way on a street. That car, later confirmed stolen, stopped in Howard County and the four suspects in the car fled on foot but were eventually apprehended. In connection with this incident, police recovered a Modified Glock, along with two other firearms.
  - e) On August 20, 2024, a 19-year-old reported that she and her boyfriend, an 18-year-old, had been arguing. She stated that he punched her, grabbed her by the hair, told her to delete the videos of the incident or he would kill her, and choked her until she lost consciousness. He repeatedly struck her, saying “I’ll kill you” and “I’ll shoot you bitch.” According to the victim, the 18-year-old had a black handgun in his waistband during the incident. Police arrested the 18-year-old and recovered a Modified Glock in the house.
  - f) On October 2, 2024, police found a 20-year-old man suffering from a gunshot wound to the head in Shipley Hill. Officers recovered a Modified Glock with an illegal large capacity magazine on his person and four shell casings in the area. The man died after being transported to a medical facility.
96. Modified Glocks have been recovered in connection with carjackings in Baltimore.

For example:

- a) On November 4, 2023, a woman was driving with her nephew in downtown Baltimore when they were approached by men in masks with handguns who ordered them out of the car, got in, and drove away. Soon after, police were able to locate three suspects in another car that was reported stolen from Prince George’s County. Two Modified Glocks were recovered in connection with this carjacking—

one of which was in the possession of an individual who was prohibited from possessing a firearm.

- b) On March 27, 2024, in West Baltimore, a 16-year-old in a car stolen in an armed robbery earlier that day failed to obey a stop sign in front of officers. When officers tried to stop the car, the 16-year-old exited the vehicle and fled, but he was ultimately apprehended. Officers recovered a Modified Glock with an illegal large capacity magazine by the driver's seat in the car.

97. Modified Glocks have been recovered in connection with dangerous incidents on public streets and roadways in and around Baltimore. For example:

- a) On November 14, 2023, officers observed and pursued a vehicle making reckless maneuvers, traveling through Baltimore City, Anne Arundel County, Howard County, and Baltimore County. At one point during the pursuit, the passenger door opened and a Modified Glock with an illegal large capacity magazine was tossed out. After exiting the Harbor Tunnel, the driver abandoned the car and was arrested after he tried to enter a truck that had been stopped in the tunnel. The driver was found to be prohibited from possessing firearms. Three others, including a 6-year-old, were in the vehicle the driver abandoned.
- b) On June 10, 2024, a car sped away from a block where several rounds of gunshots were detected. When officers stopped the car, they observed a magazine of a handgun sticking out from the driver's seat. It was a Modified Glock and the driver was arrested.
- c) On July 15, 2024, a 20-year-old driver in a stolen car refused to stop when officers attempted to pull him over, instead purposefully accelerating and ramming into the police car in an attempt to flee. The driver and the 24-year-old passenger then fled on foot but were apprehended. Two guns, including a Modified Glock, were recovered in connection with this incident. The occupants were prohibited possessors of firearms. At the time of the arrest, there were active warrants for the driver for second-degree assault and carjacking with a handgun on person, and he admitted to committing three armed carjackings and a robbery earlier that same day.
- d) On August 26, 2024, a 26-year-old man and a 22-year-old woman were sitting in a parked car that had been stolen from a dealership. When officers approached, the car sped off, crossing over an embankment and driving over grass. The car eventually crashed into another car, taking out its front bumper. The driver and passenger were apprehended. A loaded illegal large capacity magazine was found in the armrest, a Glock was located behind the passenger seat, and a Modified Glock was found just outside the car.
- e) On October 7, 2024, near Cherry Hill Homes Public Housing, two teens—18 and 19-years-old—took out handguns, and assumed shooting stances before returning the guns to their front waistbands. The two teens soon noticed a police helicopter above them, got into a car, and sped off, driving dangerously and causing people

crossing the street to run out of the way. At some point, items were tossed out of the passenger window. Officers caught up to the teens, arrested them, and found a handgun and a Modified Glock with an illegal large capacity magazine in the area where items were tossed out of the car.

- f) On December 19, 2024, officers encountered a vehicle with improper tags. The car was reported stolen from Prince George's County. When the officers tried to get behind the vehicle, it sped off; officers followed and used a helicopter to monitor the car. The male driver and female passenger bailed out of the car, abandoning it. Eventually the driver was detained. When officers reviewed video footage of the incident that had been recorded by the helicopter, they found evidence of an object being thrown out of the passenger-side window during the pursuit. Officers recovered a Modified Glock with an illegal large capacity magazine from the area where the object was thrown. The driver was a prohibited possessor in part because of prior assault in the second degree and armed robbery offenses.

98. Dual public safety crises come to a head in Baltimore and Maryland: Modified Glocks have been recovered in connection with drug trafficking. And as several incidents below highlight, both crises are adversely affecting minors and adolescents. For example:

- a) On September 4, 2023, police conducted a weapons pat down of a 16-year-old and recovered a Modified Glock with an illegal large capacity magazine and 21 pills suspected of containing heroin likely mixed with fentanyl.
- b) In April 2024, during a traffic stop in Montgomery Village, officers recovered a backpack that contained a Modified Glock with an illegal large capacity magazine, over 1,000 suspected fentanyl pills, packaging materials, a digital scale, and cash.
- c) On August 1, 2024, police initiated a traffic stop. The passenger in the car exited and appeared to be holding a black gun. As he ran, he fell and was later detained. Police conducted a canvass of the surrounding area and found numerous suspected heroin/fentanyl capsules near where the man fell. Later, on a jail call, the man spoke to an associate and gave him the cross-streets of an intersection. Police searched the area and recovered a Modified Glock with an illegal large capacity magazine in a bush at the location described.
- d) On September 21, 2024, a driver exited his parked car that had heavily tinted windows and was partially obstructing a sidewalk. Officers called in a K9 unit, which alerted that there were narcotics in the car. As one officer searched the car, he indicated that he found a firearm, at which point, the driver fled but was apprehended in a nearby alleyway. In the car, officers recovered two Modified Glocks each with loaded illegal large capacity magazines, two additional detachable magazines, a container of suspected cocaine, narcotics packaging materials, and over \$2,000 in cash. Additionally, officers recovered three plastic containers of suspected cocaine from the driver, who was prohibited from possessing firearms because of previous firearm-related offenses.

- e) In September 2024, four teens from St. Mary’s County, ranging in ages from 15 to 17, were arrested in connection with attempted carjackings. At the residence of the 17-year-old, officers found a Modified Glock with an illegal large capacity magazine, a handgun with an obliterated serial number, and over 1,000 suspected fentanyl pills.

99. Modified Glocks have been found in the possession of prohibited possessors. More than 70% of those arrested in incidents involving the recovery of a Modified Glock by BPD were prohibited from owning a firearm. And almost three-fourths of those known to be prohibited from owning a firearm and arrested were prohibited for a reason in addition to or aside from age. For example:

- a) On August 21, 2023, officers responded to a burglary at a residence in Medfield. The property manager explained that she was notified someone had removed the for-sale sign and that no one was supposed to occupy the unit. Officers arrested the two people found at the residence—one was a 19-year-old who had a Modified Glock with an illegal large capacity magazine on his person. Officers also recovered a bag that contained another Modified Glock with an illegal large capacity magazine, three boxes of hollow point ammunition, and a ski mask. Both those arrested were prohibited from possessing firearms.
- b) On December 20, 2023, a 34-year-old was stopped by officers as he exited the backseat of a car. He had a bag with 47 containers of suspected crack cocaine on him and a handgun was found in the backseat of the car near where he sat. The 34-year-old was prohibited from possessing a handgun due to a prior conviction for using a handgun in a first-degree assault. A Modified Glock with an illegal large capacity magazine was found in the car near the driver’s seat. The driver, who was prohibited from possessing a handgun due to a prior conviction for second-degree murder committed with a handgun, was also arrested.
- c) On January 10, 2024, officers observed a drug deal in South Baltimore. Officers pursued the apparent dealer and recovered from him a Modified Glock with an illegal large capacity magazine. Officers also recovered from the apparent dealer a key to a car, which was confirmed stolen out of Anne Arundel County. That car contained an additional Modified Glock with an illegal large capacity magazine. The dealer was prohibited from possessing a firearm as a term of his probation.
- d) On July 21, 2024, a couple was reported as having a dispute near Morgan State University. A witness said the girlfriend was screaming that the boyfriend had her phone and was armed with a gun. An officer arrived and recovered a Modified Glock with an illegal large capacity magazine from the boyfriend’s waistband. He was 18 years old, prohibited from possessing a firearm, and was wanted for an attempted murder that happened the month prior.

- e) On August 10, 2024, a man who was driving a car without a valid driver's license was stopped by police. Officers searched the car and found three guns, including a Modified Glock. The driver and his two passengers were all prohibited possessors.
- f) On September 17, 2024, a 27-year-old appeared to be preparing himself for an imminent shootout; he glanced across the street, cleared his clothes out of his waistband with one hand, put his other hand in his waistband, squared his shoulders to the street, and moved into a position of cover. Officers stopped the man and recovered a Modified Glock with an illegal large capacity magazine containing 30 rounds of ammunition. The man was prohibited from possessing a firearm due to an active bench warrant and his juvenile delinquency history.

100. As the number of recovered Glocks equipped with auto sears in Baltimore has increased, so have the dangerous and devastating consequences associated with them. Increasing recoveries of Modified Glocks strongly suggest that those consequences will continue, despite Plaintiffs' efforts to address the gun violence crisis and to reduce the proliferation of illegal guns, including Modified Glocks.

101. Not only are these consequences being felt acutely in Baltimore and Maryland, but they are also adversely affecting many other areas in the United States. The increased popularity of modified pistols has led federal, state, and local law enforcement from around the country to raise the alarm about the dramatic rise in the use of auto sears and automatic weapons, particularly Glocks. For example:

- a) **Nationwide:** The ATF reported a 400% increase in recoveries of illegally modified machine guns from 2020 to 2021<sup>81</sup> and a 570% increase in machine gun conversion parts recovered between 2017 and 2021 as compared to the previous five-year

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<sup>81</sup> See Alain Stephens & Keegan Hamilton, *The Sacramento Mass Shooting Likely Involved a Converted Machine Gun, Officials Say*, THE TRACE (Apr. 7, 2022), <https://www.thetrace.org/2022/04/sacramento-mass-shooting-auto-sear-machine-gun/> [<https://perma.cc/PH4F-WYW2>].

period.<sup>82</sup> Between 2018 and 2023, the ATF recovered more than 31,000 machine gun conversion devices.<sup>83</sup>

- b) **Washington, D.C.:** In 2023, the ATF Special Agent in Charge for Washington, D.C. reported an approximate 45% increase in the use of switches in crimes in D.C.<sup>84</sup> In 2022, D.C. recovered 123 firearms equipped with switches; but by November 2023, D.C. had recovered at least 165 in that calendar year.<sup>85</sup>
- c) **Twenty cities**<sup>86</sup> recovered more than 560 machine gun conversion devices in 2023, at least two-thirds of which were Glock switches.<sup>87</sup>
- d) **Chicago:** The Chicago Police Department reported the recovery of over 1,300 Modified Glocks from the beginning of 2021 through May 2024, averaging more than one Modified Glock recovery per day.<sup>88</sup>
- e) **Memphis:** In 2024, the Memphis police department estimated that it recovered three Glock switches a week.<sup>89</sup>

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<sup>82</sup> Londoño & Thrush, *supra* note 41.

<sup>83</sup> E. Martin Estrada, *U.S. Attorney and ATF Release New Public Service Announcement Warning Against Possession of Machine Gun Conversion Devices*, ATF (Jan. 11, 2024), <https://www.atf.gov/news/press-releases/us-attorney-and-atf-release-new-public-service-announcement-warning-against-possession>.

<sup>84</sup> Stephanie Ramirez, *Gun Conversion Devices a Growing Threat in DC, ATF Warns*, FOX 5 DC (Nov. 9, 2023), [<https://perma.cc/WN83-NNNG>].

<sup>85</sup> *Id.*

<sup>86</sup> Those cities were Akron, Allentown, Baltimore, Birmingham, Cleveland, Denver, Des Moines, Greensboro, Hartford, Kansas City, Little Rock, Lansing, Madison, Memphis, Nashville, Providence, Richmond, San Antonio, Savannah, and South San Francisco.

<sup>87</sup> EVERYTOWN RSCH. & POL'Y, *WHO IS MANUFACTURING THE GUNS USED IN CRIMES?* (Sept. 26, 2024), [<https://everytownresearch.org/report/city-level-data-crime-gun-recoveries>] [<https://perma.cc/9PL7-ESC7>].

<sup>88</sup> Maggie Duly, *Chicago Expands Historic Lawsuit Against Glock to Go After Parent Company, Local Retailers*, FOX 32 CHI. (July 23, 2024), [<https://www.fox32chicago.com/news/chicago-drops-historic-lawsuit-against-glock>] [<https://perma.cc/6FUA-864Y>].

<sup>89</sup> Steffen Reals, *'It's Just a Recipe for Disaster' | Here Is What's Being Done to Combat the Surge of Glock Switches Across the Country*, ABC24 (July 10, 2024), [<https://www.localmemphis.com/article/news/crime/what-is-being-done-to-combat-the-glock-switch-surge-in-the-mid-south/522-01380216-7224-4d6a-976a-6fa4d9124999>] [<https://perma.cc/7TJ2-H9YW>].

- f) **Columbus:** Officials reported a 1,200% increase in auto seat recoveries as of April 2023, compared to the same time in the previous year.<sup>90</sup>

102. Glock's ongoing conduct continues to harm public health and safety in Baltimore and elsewhere in Maryland, such as Prince George's County. The effects of Glock's continuing misconduct are felt by ordinary Marylanders as well as City and State law enforcement personnel.

103. Plaintiffs spend millions of dollars annually to prevent gun violence and gun-related crimes, to reduce their lethality, and to mitigate the long-term damage to communities in which they are endemic. In 2021, Mayor Brandon Scott released Baltimore's first-ever Comprehensive Violence Prevention Plan. Similarly, the State recently passed legislation, signed into law by Governor Wes Moore, that established the Center for Firearm Violence Prevention and Intervention in the Maryland Department of Health to reduce firearm violence, harm from firearm violence, and misuse of firearms in the State. In addition, Plaintiffs work with and support community-based violence reduction programs like Safe Streets and Roca, which seek to reduce gun violence and gun use. Such programs have meaningful impacts on individuals, families, and communities, and they become ever more crucial as the proliferation of Modified Glockes spreads.

104. By manufacturing, selling, and marketing pistols that are uniquely capable of being turned into fully automatic weapons with a simple modification, Glock has knowingly engaged in unreasonable conduct and harmed the safety and health of the public in Baltimore and Maryland.

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<sup>90</sup> See NBC4 Columbus, *Switch Handguns on the Rise in Columbus*, YOUTUBE (Apr. 27, 2023), [https://www.youtube.com/watch?v=S62EM\\_LDwdA](https://www.youtube.com/watch?v=S62EM_LDwdA).

**FIRST CLAIM FOR RELIEF**  
**Violation of Md. Code, Cts & Jud. Proc. § 3-2502**  
**(Public Nuisance by Firearm Industry Member)**

105. Plaintiffs repeat, reallege, and incorporate as if fully set forth herein the allegations of paragraphs 1 through 104 above.

106. As described below, Maryland law imposes liability on a “firearms industry member” when it knowingly engages in conduct that creates, maintains or contributes to harm to the public through the sale, manufacture, distribution, importation, or marketing of a firearm industry product.

107. A “firearm industry member” is “a person engaged in the sale, manufacture, distribution, importation, or marketing of a firearm-related product,” which includes companies. MD. CODE, CTS. & JUD. PROC. § 3-2501(c) (West 2024).

108. A “firearm-related product” includes firearms, ammunition, and firearms parts and accessories that are “[s]old, manufactured, distributed, or marketed” in Maryland or that are “[i]ntended to be sold, manufactured, distributed, or marketed” in Maryland. *Id.* § 3-2501(d).

109. Glock is a “firearm industry member” that manufactures, distributes, imports, markets, and sells “firearm-related products” within the meaning of the Act.

110. Under the Act, a “firearm industry member” can be held liable for “knowingly creat[ing], maintain[ing], or contribut[ing] to harm to the public through the sale, manufacture, distribution, importation, or marketing of a firearm-related product by engaging in conduct that is (1) unlawful; or (2) unreasonable under the totality of the circumstances.” *Id.* § 3-2502(a). Under the same law, a “firearms industry member” is also required to “establish and implement reasonable controls regarding the sale, manufacture, distribution, importation, marketing, possession, and use of [its] firearm-related products.” *Id.* § 3-2502(b). A violation constitutes a public nuisance. *Id.* § 3-2502(c).

111. “Reasonable controls” means policies that are designed (1) “to prevent the sale and distribution of a firearm-related product to” an individual who possesses and transfers the product unlawfully or who “the firearm industry member has reasonable cause to believe intends to use” it “to commit a crime” or “to cause harm” to a person; (2) “to prevent the loss or theft of a firearm-related product from a firearm industry member”; and (3) “to ensure that the firearm industry member complies with all provisions of State and federal law and does not otherwise promote the unlawful sale, manufacture, alteration, importation, marketing, possession, or use of a firearm-related product.” *Id.* § 3-2501(f).

112. At all times relevant to this lawsuit, Glock has manufactured pistols and then sold, distributed and marketed them in Maryland, and it continues to do so. In fact, according to its website, Glock has relationships with more than 55 dealers located in Maryland, including at least 20 within a 20-mile radius of Baltimore City.

113. Thousands of Maryland consumers have purchased and will continue to purchase Glock’s easily modifiable pistols. Maryland residents who live outside of Baltimore can and do purchase Glock pistols from gun dealers located within the State, either through the “Buy Now” feature on Glock’s website or by visiting a gun dealer—including dealers that have entered into arrangements with Glock to serve as Glock-authorized dealers. Baltimore residents can (and do) also use Glock’s website to facilitate their purchases; they do so by entering their addresses—or similarly “Baltimore”—on Glock’s website to be directed to a nearby federally licensed Glock-authorized gun store just outside of city limits where they can purchase their pistols. In addition, Glock pistols can be purchased directly by Baltimore residents via the “Buy Now” link on Glock’s website and then picked up at a brick-and-mortar location in the State. The “Buy Now” link directs to a third-party website, which allows customers to place the pistol in an online cart and complete

the purchase transaction, including payment. The pistol is then shipped to a federally licensed brick-and-mortar gun store for the customer to complete the required steps, including a background check, and pick up the pistol.

114. While it is illegal to sell machine guns to non-law-enforcement personnel, except under very limited circumstances, Glock sells, manufactures, distributes, imports, and markets to civilians semiautomatic pistols that easily accept auto sears, under all of the circumstances described in this Complaint, thereby promoting the proliferation of illegal machine guns in Baltimore and Maryland. Through these practices, Glock knowingly creates, maintains, and contributes to harm in Baltimore and Maryland that harms the safety and health of the public, including youth.

115. Glock knows that the pistols it sells to the civilian market easily accept—and are frequently and illegally possessed and/or modified with—auto sears. Yet, in violation of the Act, Glock continues to sell and market its easily converted pistols into Maryland to civilian, non-law-enforcement personnel, under all of the circumstances described in this Complaint. Glock does this despite knowing that there are reasonable steps it could take to make it more difficult for its pistols to accept auto sears and to be converted into illegal machine guns. Further, as described in this Complaint, Glock continues to promote the fully automatic capabilities of the G18 model to civilians through its social media, enhancing the appeal of automatic Glockes, and otherwise promotes fully automatic fire to civilian consumers through its social media. This conduct is unreasonable under the totality of the circumstances.

116. Furthermore, Glock has knowingly failed to establish and implement reasonable controls to ensure that it does not promote the unlawful possession, alteration, and use of its pistols. It does so by continuing to sell and market its easily modified semiautomatic pistols, promoting

the fully automatic capabilities of the G18, failing to fix the problem, and refraining from providing any warnings or disclosures pertaining to the prohibitions on civilian manufacturing or possessing machine guns. Instead, it has continued to manufacture, distribute, sell, and market its pistols to civilian consumers in Maryland as if the problem did not exist.

117. Glock's conduct therefore violates the Act and constitutes a public nuisance because it is unreasonable and/or demonstrates a lack of reasonable controls. *See MD. CODE, CTS. & JUD. PROC. § 3-2502.*

118. Glock has harmed the public, undermined law enforcement efforts to prevent and reduce gun violence and other gun-related crime, diverted scarce law enforcement resources, and reduced public health and safety.

119. The aforementioned conduct has proximately caused harm to the City and the State.

120. Pursuant to the Act, Plaintiffs seek an order enjoining Glock from engaging in practices that violate the Act and compelling Glock to abate the nuisance by, including but not limited to, ceasing the distribution, marketing, and sales of easily modifiable Glock pistols to civilians in Maryland, addressing easily modifiable Glock pistols already distributed and sold to civilians in Maryland, and contributing to a monetary abatement fund.

121. Plaintiffs also seek an order providing for the payment of restitution and disgorgement of profits, awarding Plaintiffs fees, costs, and any other relief the Court deems appropriate.

**SECOND CLAIM FOR RELIEF**  
**Public Nuisance**

122. Plaintiffs repeat, reallege, and incorporate as if fully set forth herein the allegations of paragraphs 1 through 104 above.

123. Defendants, individually and in concert with each other, have created, contributed to, and/or assisted in creating conditions that significantly interfere with rights general to the public, including public health, public safety, public comfort, and public convenience.

124. Due to the historical and ongoing interference with those rights, Defendants' conduct is a public nuisance.

125. The nuisance created and contributed to by Defendants is substantial and unreasonable. It has caused, continues to cause, and will continue to cause significant harm to the community as alleged herein, and that harm outweighs any offsetting benefit.

126. Glock specifically created, contributed to, and/or assisted, and/or was a substantial contributing factor in the creation of the public nuisance by selling and marketing semiautomatic pistols to civilian consumers that can be easily modified to illegal machine guns, and by failing to take reasonable and effective steps to prevent such illegal modifications, under all of the circumstances described in this Complaint. Further, as described in this Complaint, Glock continues to promote the fully automatic capabilities of the G18 model to civilians through its social media, enhancing the appeal of fully automatic Glocks, and otherwise promotes fully automatic fire to civilian consumers through its social media. Glock's conduct foreseeably results in the illegal possession and use of machine guns by civilians in the City and State. Yet, Glock continues to sell its easily modified pistols into Maryland, knowing they are regularly being illegally converted, possessed and used there. Absent an injunction, abatement or other relief, this public nuisance will continue indefinitely.

127. Glock's conduct was, and continues to be, in knowing violation of the Act. MD. CODE, CTS. & JUD. PRO. § 3-2502(a)-(f). These knowing violations proximately harmed the City and the State.

128. Glock's conduct unjustifiably endangers, renders insecure, interferes with, and obstructs the rights of the residents of Baltimore and Maryland. By selling and marketing semiautomatic pistols to civilian consumers that can be easily modified to machine guns, Glock has created and/or contributed to a terror on the streets of Baltimore and elsewhere in Maryland—a terror once reserved for battlefields. Glock also promotes the fully automatic capabilities of the G18 model to civilians through its social media, enhancing the appeal of fully automatic Glocks.

129. Glock's conduct has created, maintained, and contributed to a public nuisance in Baltimore and Maryland by unreasonably interfering with the right of the general public to life, health, the use and enjoyment of property, the right to travel within the City and State, and the right to attend school, all without fear of being shot with or menaced by Modified Glocks. The unlawful proliferation of illegal machine guns interferes with rights common to the general public; deprives Baltimore, Maryland, and their residents and visitors of the peaceful use of public streets, sidewalks, parks, and other public places; interferes with commerce, travel, and the quality of daily life; and endangers the health, welfare, peace, safety, well-being, convenience, and property of considerable numbers of residents of, and visitors to, Baltimore and Maryland. These harms are felt in the City and the State.

130. Glock's actions were, at the least, a substantial factor in illegal machine guns becoming readily available and widely possessed and used in Baltimore and Maryland. Absent Defendants' actions, machine guns—which have been heavily regulated at the state and federal level for nearly a century—would not now be so easy for civilians to acquire through the illegal modification of easy-to-convert and readily available Glock semiautomatic pistols, and the endangering of the public from the proliferation of illegal machine guns that now exists would have been averted.

131. Plaintiffs seek an order enjoining Glock from creating or contributing to a nuisance, and compelling Glock to abate the nuisance by, including but not limited to, ceasing the distribution, marketing and sales of easily modifiable Glock pistols to civilians in Maryland and/or to civilian Maryland consumers, addressing easily modifiable Glock pistols already distributed and sold to civilians in Maryland and/or to civilian Maryland consumers, and contributing to a monetary abatement fund.

132. Plaintiffs also seek an order awarding them fees, costs, and any other relief that the Court deems appropriate.

### **REQUEST FOR RELIEF**

Wherefore, Plaintiffs request that the Court grant judgment in their favor, as follows:

- i. Enjoining Glock from marketing and selling pistols that can easily be converted to fire fully automatically to non-law-enforcement consumers in Maryland;
- ii. Ordering Glock to implement reasonable controls, safeguards, and procedures to prevent its easily converted pistols from being possessed, altered, used, marketed, or sold unlawfully to non-law-enforcement consumers in Maryland;
- iii. Ordering Glock to abate the public nuisance that Glock has created, contributed to, and/or maintained, including but not limited to addressing the easily modifiable Glock pistols already distributed and sold to civilians in Maryland and/or to civilian Maryland consumers, and contributing to a monetary abatement fund;
- iv. Ordering restitution and disgorgement of profits;
- v. Awarding pre- and post-judgment interest, to the extent allowable;
- vi. Awarding Plaintiffs' costs of investigation and suit, including any reasonable attorneys' fees and costs;
- vii. Providing such further relief as the Court deems appropriate.

Dated: February 12, 2024

Respectfully Submitted,

THE STATE OF MARYLAND

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**SB0334\_kasuba\_UNF.pdf**

Uploaded by: Thomas Kasuba

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Please Find **UNFAVORABLE** SENATE BILL 334  
Criminal Law – Firearm Crimes – Machine Gun Convertible Pistols

SB0334 is unnecessary and overly broad in that it seeks to criminalize Glock style handguns based on the claim that they can be converted into machine guns, despite the fact that **manufacturing or possessing a machine gun is already illegal under federal law**. Under longstanding federal statutes, conversion devices are themselves classified as machine guns, and their possession carries severe felony penalties. So Maryland seeks to make such devices more "illegaler?"

This bill does not address **criminal behavior**—it instead **targets lawful firearm ownership** by banning pistols based on completely hypothetical misuse rather than actual function. Will this committee start banning cars capable of being modified to exceed the speed limit? The firearms affected by SB0334 are not machine guns; they fire one round per trigger pull and are widely owned by many Marylanders for competitive and self-defense purposes.

Equally troubling, SB0334 delegates broad authority to the Maryland State Police to determine which pistols are prohibited through regulation. This allows an executive agency to effectively ban firearms without legislative debate and creates a pathway for future expansion well beyond the bill's stated intent.

SB0334 duplicates federal law, expands government power unnecessarily, and risks turning ordinary Marylanders, in the near future, into criminals for owning some of the most common firearm in existence. For these reasons, I respectfully urge an **unfavorable report**.



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February 3, 2026

# **2026\_02\_03 SB 334 - Machine Gun Convertible Pistol**

Uploaded by: Tiffany Clark

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**STATE OF MARYLAND**  
**OFFICE OF THE ATTORNEY GENERAL**

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February 5, 2026

**TO:** The Honorable Will Smith  
Chair, Judicial Proceedings Committee

**FROM:** Tiffany Clark  
Director, Legislative Affairs, Office of the Attorney General

**RE:** Senate Bill 334 - Criminal Law - Firearm Crimes - Machine Gun  
Convertible Pistols (Support in Concept)

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The Office of the Attorney General (OAG) supports in concept **Senate Bill 334 - Criminal Law - Firearm Crimes - Machine Gun Convertible Pistols**, which proposes to prohibit the manufacture, sale, offer for sale, purchase, receipt, or transfer of machine gun convertible pistols beginning January 1, 2027.

As Maryland's elected Chief Legal Officer, the Attorney General supervises and directs the legal business of the State. The OAG advises and represents State institutions, agencies, boards, commissions, and officials, while representing Maryland's interests in state and federal litigation. The OAG uses its authority to enforce the rule of law, protect Marylanders, and promote the public good.

Senate Bill 334 addresses the growing public safety threat posed by illegal aftermarket devices commonly known as "Glock switches". These devices convert semiautomatic pistols into fully automatic machine guns capable of firing hundreds of rounds per minute. These devices have been increasingly recovered in connection with violent crimes across Maryland and the nation. By restricting the commercial transfer of pistols with design features that facilitate easy conversion to machine guns, this legislation takes a proactive approach to reducing the availability of firearms that are readily compatible with these dangerous illegal accessories.

This legislation directly supports our efforts to combat gun violence, protect Maryland communities, and enhance public safety through evidence-based policy interventions.

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While we support the bill's intent and public safety objectives, we recommend that the Committee consider technical refinements to enhance clarity and facilitate effective implementation. There are key terms in this bill that would benefit from additional definition to ensure consistent application and enforceability, such as: "readily converted," "common household tools," and specific design feature descriptions. We believe these refinements will strengthen the bill's ability to achieve its intended public safety goals.

We welcome the opportunity to work collaboratively with the bill's sponsors and the Committee to refine the statutory language and ensure the bill can be implemented effectively to protect Marylanders.

We appreciate the General Assembly's work on this important policy and welcome the opportunity to share our perspective.

Cc: Members of the Committee