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**UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

FIREARMS POLICY COALITION, INC.,  
LUIGI DECECCO, RICHARD FORD,  
DANIEL FRANCISCO, ERIC  
LOWMASTER, JAMES SHOCKLEY,  
HIGH CALIBER ORDINANCE LLC, and  
LOUIE G'S OUTDOORS,

*Plaintiffs,*

v.

MATTHEW PLATKIN, Attorney General of  
New Jersey, and PATRICK CALLAHAN,  
Superintendent of the New Jersey State  
Police,

*Defendants.*

Hon. Robert Kirsch, U.S.D.J.  
Hon. Justin T. Quinn, U.S.M.J.

Docket No. 3:25-cv-13522

Civil Action

**ANSWER TO FIRST AMENDED  
COMPLAINT WITH AFFIRMATIVE  
DEFENSES ON BEHALF OF  
DEFENDANTS MATTHEW PLATKIN  
AND PATRICK CALLAHAN**

Defendants Matthew J. Platkin and Patrick J. Callahan, hereinafter referred to collectively as "Defendants," by and through the undersigned counsel, hereby answer the allegations set forth in Plaintiffs' First Amended Complaint as follows:

## INTRODUCTION

1. Defendants refer the Court to the actual text of the constitutional provision referenced for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

2. Defendants refer the Court to the actual text of the case cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

3. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

4. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph. Defendants accept, for the sole purpose of answering the First Amended Complaint, Plaintiffs' definition of SBRs to mean "rifles that have barrel lengths of less than sixteen inches or overall lengths of less than twenty-six inches."

5. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

6. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required. To the extent a response is required, Defendants deny that "New Jersey's scheme of statutes, regulations, policies, and enforcement practices regulat[e] firearms unconstitutionally."

7. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

8. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required. To the extent a response is required, Defendants deny that New Jersey's laws violate the Second and Fourteenth Amendments to the United States Constitution.

9. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

10. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required. To the extent a response is required, Defendants deny that New Jersey's laws must be declared unconstitutional or enjoined.

### **JURISDICTION**

11. Defendants refer the Court to the actual text of the statute cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

12. Defendants refer the Court to the actual text of the statute cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

13. Defendants refer the Court to the actual text of the statutes cited for a true and accurate account of their content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

14. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

**VENUE**

15. Defendants refer the Court to the actual text of the statute cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

16. Defendants refer the Court to the actual text of the statute cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

**PARTIES**

***Plaintiff Firearms Policy Coalition, Inc.***

17. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

18. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

19. Defendants refer the Court to the actual text of the cases cited for a true and accurate account of their content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required. Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph.

***Plaintiff Luigi Dececco***

20. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

21. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

***Plaintiff Daniel Francisco***

22. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

23. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

***Plaintiff Richard Ford***

24. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

25. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

***Plaintiff Eric Lowmaster***

26. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

27. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

***Plaintiff James Shockley***

28. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

29. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

***Plaintiff High Caliber Ordinance LLC***

30. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

31. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

***Plaintiff Louie G's Outdoors***

32. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

33. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

***Defendant Matthew J. Platkin***

34. Admitted.

35. Defendants refer the Court to the actual text of the statutes cited for a true and accurate account of their content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

***Defendant Colonel Patrick J. Callahan***

36. Admitted.

37. Defendants refer the Court to the actual text of the statute cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

**FACTUAL ALLEGATIONS**

38. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

39. Defendants refer the Court to the actual text of the statute cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

40. Defendants refer the Court to the actual text of the statute cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

41. Defendants refer the Court to the actual text of the statutes cited for a true and accurate account of their content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

42. Defendants refer the Court to the actual text of the statute cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

43. Defendants refer the Court to the actual text of the statutes cited for a true and accurate account of their content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

44. Defendants refer the Court to the actual text of the statutes, regulations, policies, and enforcement practices referenced for a true and accurate account of their content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required. Defendants deny that there is any law in New Jersey known as “New Jersey’s SBR Ban,” but accept, for the sole purpose of answering the First Amended Complaint, Plaintiffs’ definition of “New Jersey’s SBR Ban” as set forth in Paragraph 44 of the First Amended Complaint.

45. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

46. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required. Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph.

47. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

48. Defendants refer the Court to the actual text of the article cited for a true and accurate account of its content and proper context. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

49. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

50. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

51. Defendants refer the Court to the actual text of the Bureau of Alcohol, Tobacco, Firearms and Explosives documents referenced for a true and accurate account of their content and proper context. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph.

52. Defendants refer the Court to the actual text of the cases cited for a true and accurate account of their content and proper context. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

53. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

54. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

55. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

56. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

57. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

58. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

59. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

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63. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

64. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

65. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

66. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

67. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

68. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

69. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

70. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

71. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

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74. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

75. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

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77. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

78. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

79. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

80. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

81. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

82. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

83. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

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86. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

87. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

88. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

89. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

90. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

91. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

92. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

93. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

94. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

95. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

96. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

97. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

98. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

99. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

100. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

101. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

102. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

103. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

104. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

105. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

106. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

107. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

108. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

109. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

110. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

111. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

112. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

113. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

114. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

115. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

116. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

117. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

118. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

119. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

120. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

121. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

122. Defendants lack knowledge or information sufficient to form a belief as to the truth of the factual allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

**CAUSES OF ACTION**

**COUNT ONE – 42 U.S.C. § 1983**

**CLAIM FOR VIOLATION OF THE SECOND AMENDMENT**

123. Defendants hereby repeat and reassert their answers to the previous paragraphs as if set forth fully herein.

124. Defendants refer the Court to the actual text of the constitutional provision quoted for a true and accurate account of its content and proper context.

125. Defendants refer the Court to the actual text of the constitutional provision referenced and the case cited for a true and accurate account of their content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

126. Defendants refer the Court to the actual text of the case cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

127. Defendants refer the Court to the actual text of the case cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

128. Defendants refer the Court to the actual text of the constitutional provision referenced for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

129. Defendants refer the Court to the actual text of the constitutional provision referenced for a true and accurate account of its content and proper context. The remaining

allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

130. Defendants refer the Court to the actual text of the constitutional provision referenced for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

131. Defendants refer the Court to the actual text of the cases cited for a true and accurate account of their content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

132. Defendants refer the Court to the actual text of the case cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

133. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

134. Defendants refer the Court to the actual text of the constitutional provision referenced and the cases cited for a true and accurate account of their content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

135. Defendants refer the Court to the actual text of the case and article cited for a true and accurate account of their content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

136. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

137. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

138. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

139. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

140. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

141. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph.

142. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

143. Defendants refer the Court to the actual text of the constitutional provision cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

144. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

145. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

146. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

147. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

148. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

149. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

150. Defendants refer the Court to the actual text of the case cited for a true and accurate account of its content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

151. Defendants refer the Court to the actual text of the statute cited and constitutional provisions referenced for a true and accurate account of their content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

152. Defendants refer the Court to the actual text of the statute cited and constitutional provision referenced for a true and accurate account of their content and proper context. The remaining allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

153. Defendants refer the Court to the actual text of the constitutional provision referenced for a true and accurate account of its content and proper context. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

Defendants otherwise lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph.

154. The allegations in this paragraph are not factual assertions, but conclusions of law to which no response is required.

155. The statement in this paragraph is not a factual allegation, but Plaintiffs' request for relief to this Court, to which no response is required. To the extent a response is required, Defendants deny that Plaintiffs are entitled to the relief requested.

156. The statement in this paragraph is not a factual allegation, but Plaintiffs' request for relief to this Court, to which no response is required. To the extent a response is required, Defendants deny that Plaintiffs are entitled to the relief requested.

157. The statement in this paragraph is not a factual allegation, but Plaintiffs' request for relief to this Court, to which no response is required. To the extent a response is required, Defendants deny that Plaintiffs are entitled to the relief requested.

158. The statement in this paragraph is not a factual allegation, but Plaintiffs' request for relief to this Court, to which no response is required. To the extent a response is required, Defendants deny that Plaintiffs are entitled to the relief requested.

159. The statement in this paragraph is not a factual allegation, but Plaintiffs' request for relief to this Court, to which no response is required. To the extent a response is required, Defendants deny that Plaintiffs are entitled to the relief requested.

**PRAYER FOR RELIEF**

**WHEREFORE**, Defendants demand judgment dismissing Plaintiffs' First Amended Complaint with prejudice, together with costs of suit.

Defendants deny that Plaintiffs' constitutional rights have been violated. Defendants deny that Plaintiffs are entitled to any relief from Defendants, including a declaratory judgment and/or injunctive relief, attorneys' fees, expert fees, costs, or any other relief demanded by Plaintiffs.

**AFFIRMATIVE DEFENSES**

**FIRST AFFIRMATIVE DEFENSE**

The First Amended Complaint fails to state a claim against Defendants upon which relief may be granted.

**SECOND AFFIRMATIVE DEFENSE**

Plaintiffs do not have standing with respect to the allegations in the First Amended Complaint.

**THIRD AFFIRMATIVE DEFENSE**

The claims asserted in Plaintiffs' First Amended Complaint are not ripe for adjudication.

**FOURTH AFFIRMATIVE DEFENSE**

Defendants enjoy absolute and/or qualified immunity from the claims raised in the suit.

**FIFTH AFFIRMATIVE DEFENSE**

The challenged New Jersey laws do not violate the Second Amendment because they are consistent with this Nation's historical tradition of firearm regulation.

**RESERVATION OF RIGHTS AND DEFENSES**

Defendants hereby reserve any and all defenses that are available under the Federal Rules of Civil Procedure and any other defenses, at law, or in equity, that may now exist or become available later as a result of discovery and further factual investigation and discovery during this litigation.

**JURY DEMAND**

Defendants hereby demand trial by jury as to all triable issues.

**LOCAL CIVIL RULE 11.2 CERTIFICATION**

Pursuant to Local Civil Rule 11.2, I hereby certify that, to the best of my knowledge, information, and belief, the matter in controversy is not the subject of any other action pending in any court, or of any pending arbitration or administrative proceeding.

MATHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Giancarlo G. Piccinini  
Giancarlo Genaro Piccinini  
Deputy Attorney General

Dated: December 8, 2025

**CERTIFICATE OF SERVICE**

I certify that on December 8, 2025, Defendants Matthew J. Platkin's and Colonel Patrick J. Callahan's Answer was electronically filed with the Clerk of Court in the United States District Court for the District of New Jersey through the Court's CM/ECF system, which filing effected service upon counsel of record through the CM/ECF system.

MATHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: Giancarlo G. Piccinini  
Giancarlo Genaro Piccinini  
Deputy Attorney General

Dated: December 8, 2025