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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

Lana Rae Renna; Danielle Jaymes; Laura
Schwartz; Michael Schwartz; John Klier;
Justin Smith; John Phillips; Cheryl
Prince; Darin Prince; Ryan Peterson;
PWGG, L.P.; North County Shooting
Center, Inc.; Gunfighter Tactical, LLC;
Firearms Policy Coalition, Inc.; San
Diego County Gun Owners PAC;
Citizens Committee for the Right to
Keep and Bear Arms; Second
Amendment Foundation; and National
Rifle Association of America,

Plaintiffs,

v.

ROB BONTA, Attorney General of
California; and ALLISON MENDOZA,
Director of the California Department of
Justice Bureau of Firearms,

Defendants.

Case No.: 20-cv-2190-DMS-DEB

**[PROPOSED] SUPPLEMENTAL
COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF**

1 Plaintiffs Lana Rae Renna; Danielle Jaymes; Laura Schwartz; Michael
2 Schwartz; John Klier; Justin Smith; John Phillips; Cheryl Prince; Darin Prince; Ryan
3 Peterson; PWGG, L.P.; North County Shooting Center, Inc.; Gunfighter Tactical,
4 LLC; Firearms Policy Coalition, Inc.; San Diego County Gun Owners PAC; Citizens
5 Committee for the Right to Keep and Bear Arms; Second Amendment Foundation;
6 and National Rifle Association of America (collectively “Plaintiffs”), file this
7 supplemental complaint, pursuant to Federal Rule of Civil Procedure 15(d), to
8 challenge the constitutionality of California Penal Code § 27595(a).

9 Plaintiffs complain of Defendants Attorney General of California Rob Bonta
10 and California Department of Justice Bureau of Firearms Director Allison Mendoza
11 (collectively “Defendants”), and allege as follows:

12 INTRODUCTION

13 1. Plaintiffs incorporate by reference all allegations in their Fourth
14 Amended Complaint for Declaratory and Injunctive Relief and incorporate those
15 allegations as if fully set forth in this supplemental complaint.

16 2. The Second Amendment to the United States Constitution protects law-
17 abiding citizens’ right to possess—and, as an incident, to acquire—firearms that are
18 in common use for lawful purposes, including handguns. *See District of Columbia v.*
19 *Heller*, 554 U.S. 570, 627, 629 (2008); *N.Y. State Rifle & Pistol Ass’n v. Bruen*, 597
20 U.S. 1, 32 (2022); *Wolford v. Lopez*, 609 U.S. ----, 2026 WL 1825723, *4, *9 (2026).

21 3. On October 31, 2022, Plaintiffs filed their Third Amended Complaint
22 alleging that California’s Unsafe Handgun Act (“UHA”) violates the Second
23 Amendment because it bans the sale of handguns that are in common use for self-
24 defense and other lawful purposes. *See* ECF 67 ¶ 59.

25 4. This Court held that several provisions of the UHA likely violate the
26 Second Amendment. *See Renna v. Bonta*, 667 F. Supp. 3d 1048, 1060 (S.D. Cal.
27 2023), *appeal pending*, No. 23-55367 (9th Cir.). The Court concluded that those
28 provisions banned many new models of semiautomatic handguns that are in common

1 use. *Id.* at 1063. And it specifically found that certain Glock handgun models are in
2 common use. *See id.* (discussing the Glock 43 and Glock 17 Gen 5).

3 5. On March 27, 2026, Plaintiffs filed the operative, Fourth Amended
4 Complaint, which added the National Rifle Association of America as a plaintiff. *See*
5 ECF 99 (“FAC”).

6 6. As of July 1, 2026, California *expanded* its handgun ban to encompass
7 *additional* models of Glock and Glock-style handguns. *See* Cal. Penal Code
8 § 27595(a). These models, too, are in common use. Indeed, they are among the most
9 popular firearms in the nation. Yet if § 27595 is enforced, Californians will have no
10 practical way to acquire them.

11 7. So even if Plaintiffs were successful in their existing challenge to the
12 UHA set forth in the FAC, § 27595 would separately prohibit their ability to purchase
13 off-Roster Glock handguns (such as all Gen 4, Gen 5, and “V” series models).
14 Moreover, the few models of Glock handguns that were available on the Roster are
15 now banned by § 27595(a). The net result is that California has imposed a total ban
16 on the retail sale of all Glock models currently in production.

17 8. Plaintiffs lodge this supplemental complaint under Federal Rule of Civil
18 Procedure 15(d) to challenge § 27595, which is flagrantly unconstitutional and, like
19 the rest of the laws at issue in this suit, prohibits peaceable Californians from acquiring
20 ordinary handguns.

21 9. *Heller* held that handguns cannot be banned because “the handgun [is]
22 the quintessential self-defense weapon” and “the most popular weapon chosen by
23 Americans for self-defense in the home.” 554 U.S. at 629. This Court has therefore
24 recognized in this case that California cannot ban handguns in common use. *See*
25 *Renna*, 667 F. Supp. 3d at 1060–68.

26 10. California’s decision to reach beyond the UHA’s handgun ban to prohibit
27 additional, commonly used handgun models is no more constitutional than its decision
28

1 to enact that UHA’s ban in the first place. Plaintiffs respectfully request that this Court
2 declare as much and enjoin § 27595’s enforcement.

3 **PARTIES**

4 11. Plaintiffs are described in paragraphs 17 through 55 of the FAC.
5 Plaintiffs incorporate each and every one of those paragraphs here.

6 12. **Danielle Jaymes (FAC ¶¶ 20–21).** Plaintiff Jaymes intends, on or after
7 July 1, 2026, to purchase a Glock 19C in San Diego County from Plaintiff PWGG,
8 L.P. As discussed below, § 27595 bans the sale of Glock 19Cs.

9 13. **PWGG, L.P. (FAC ¶¶ 39–42).** Plaintiff PWG has sold thousands of
10 Glock and Glock-style handguns to law-abiding customers since opening in 2011. As
11 discussed below, § 27595 bans the sale of these handguns. But for its reasonable fear
12 of prosecution under § 27595, Plaintiff PWG would continue selling these handguns
13 on or after July 1, 2026.

14 14. **Firearms Policy Coalition (FAC ¶ 51).** FPC brings this action on behalf
15 of its members, including members residing in this district, who intend to exercise
16 their Second Amendment rights to purchase Glock and Glock-style handguns on or
17 after July 1, 2026.

18 15. **Second Amendment Foundation (FAC ¶ 54).** SAF brings this action
19 on behalf of its members, including members residing in this district, who intend to
20 exercise their Second Amendment rights to purchase Glock and Glock-style handguns
21 on or after July 1, 2026.

22 16. **National Rifle Association of America (FAC ¶ 55).** NRA brings this
23 action on behalf of its members, including those residing in this district, who intend
24 and desire to exercise their Second Amendment rights to purchase Glock and Glock-
25 style handguns on or after July 1, 2026.

26 17. **Defendant Rob Bonta (FAC ¶ 56).** Defendant Bonta is the Attorney
27 General of the State of California and is sued here in his official capacity. The
28 Attorney General is the “chief law officer of the State” of California and has a duty

1 “to see that the laws of the state are uniformly and adequately enforced.” Cal. Const.
2 art. V § 13. The Attorney General is also the head of the California DOJ, which
3 enforces state laws related to the sale, transfer, possession, and ownership of firearms.
4 The Attorney General and DOJ maintain an office in San Diego, California.

5 18. **Defendant Allison Mendoza (FAC ¶ 57).** Defendant Mendoza is the
6 Director of the DOJ’s Bureau of Firearms. On information and belief, Defendant
7 Mendoza reports to Attorney General Bonta, and she is responsible for the various
8 operations of the Bureau of Firearms, including the implementation and enforcement
9 of the statutes, regulations, and policies regarding firearm and ammunition sales,
10 possession, and transfers. Defendant Mendoza is sued in her official capacity.

11 JURISDICTION, VENUE, AND FORUM

12 19. This Court has subject-matter jurisdiction under 28 U.S.C. § 1331
13 because Plaintiffs’ claims arise under 42 U.S.C. § 1983. This Court also has subject-
14 matter jurisdiction under 28 U.S.C. § 1343 because Plaintiffs’ supplemental claim
15 seeks redress for the deprivation, under color of state law, of rights secured by the
16 Second Amendment. *See id.* § 1343(a)(3) (district courts shall have original
17 jurisdiction over any action to “redress the deprivation, under color of any State
18 law, ... of any right, privilege or immunity secured by the Constitution of the United
19 States”).

20 20. Venue is proper in this Court because California Penal Code § 27595 will
21 restrict the Individual Plaintiffs from buying, and Plaintiff PWG from selling, covered
22 firearms in this district. *See* 28 U.S.C. § 1391(b)(2) (“A civil action may be brought
23 in a judicial district in which a substantial part of the events or omissions giving rise
24 to the claim occurred, or a substantial part of property that is the subject of the action
25 is situated.”).

26 21. Plaintiffs may lodge the claim below in a supplemental complaint under
27 Federal Rule of Civil Procedure 15(d). That rule permits new claims to be brought in
28 a supplemental complaint so long as those claims have “some relation to the claim[s]

1 set forth in the original pleading.” *Keith v. Volpe*, 858 F.2d 467, 474 (9th Cir. 1988)
2 (cleaned up). Plaintiffs’ original claims challenged California’s ban on many handgun
3 models pursuant to the UHA’s “Roster Ban.” *See Renna*, 667 F. Supp. 3d at 1060
4 (noting Plaintiffs challenged a handgun “sales ban” (cleaned up)). Plaintiffs’
5 supplemental claim challenges California’s dramatic expansion of the list of banned
6 handgun models—namely older Glock and Glock-style models—that had previously
7 appeared on the UHA’s list of approved models. Plaintiffs’ supplemental claims are
8 therefore related to their original claims. If Plaintiffs succeed on their constitutional
9 challenge to the UHA, § 27595 would pose a separate bar to their ability to purchase
10 Glock handguns. This supplemental complaint is therefore appropriate to aid Plaintiffs
11 in seeking complete relief in this suit.

12 22. Plaintiffs’ supplemental complaint comports with the purpose of Rule
13 15(d), which is to promote “the efficient administration of justice” by avoiding “the
14 cost, delay and waste of separate actions.” *Keith*, 858 F.2d at 474 (cleaned up); *see*
15 *also* 6A Charles Alan Wright & Arthur R. Miller, Federal Practice and Procedure
16 § 1506 (3d ed.) (noting “the desirability of reducing multiplicity of litigation by
17 permitting as many of the claims between the parties as possible to be settled in one
18 action”). Because Plaintiffs’ supplemental claim is related to their original claims,
19 adjudicating all these claims in a single action will reduce duplicative litigation, thus
20 promoting “the economical and speedy disposition of the controversy” between
21 Plaintiffs and California. *Keith*, 858 F.2d at 474.

22 GENERAL ALLEGATIONS

23 23. Plaintiffs brought this action to challenge California’s Unsafe Handgun
24 Act. The UHA “prohibit[s] the manufacture and retail sale in California of a large
25 segment of modern handguns that are otherwise in common use throughout the United
26 States for self-defense and other lawful purposes.” *See Renna v. Bonta*, 667 F. Supp.
27 3d 1048, 1054 (S.D. Cal. 2023). It does so by prohibiting retail sales of all handgun
28

1 models except those models included on a “roster” maintained by the California
2 Department of Justice. *See* Cal. Penal Code § 32015(a).

3 24. The roster excludes many of the most popular new handguns in the
4 Nation. Older versions of those firearms, however, are often “grandfathered” in and
5 remain legal for sale. *See Renna*, 667 F. Supp. 3d at 1056 (describing 2007 and 2013
6 amendments). Relevant here, the roster excludes fourth- and fifth-generation Glock
7 handguns. But it includes earlier, third-generation Glock handguns, which are
8 handgun models that Glock began producing between 1998 and 2010. *See* Justin
9 Chang, *Glock Generation Differences: Gen 3, Gen 4, Gen 5 [Guide]*, PEW
10 TACTICAL (July 6, 2024), <https://perma.cc/UGC7-MDJR>. The Roster includes other
11 cruciform trigger bar handguns as well, including several of the Shadow Systems 920
12 line.

13 25. On April 3, 2023, this Court preliminarily enjoined several provisions of
14 the UHA. It found that those provisions are likely unconstitutional because they ban
15 new models of semiautomatic handguns that are in common use, including fourth- and
16 fifth-generation Glocks. *See Renna*, 667 F. Supp. 3d at 1060, 1063.

17 26. On October 10, 2025, California enacted Assembly Bill 1127, which
18 provides that, effective July 1, 2026, licensed firearms dealers “shall not sell, offer for
19 sale, exchange, give, transfer, or deliver any semiautomatic machinegun-convertible
20 pistol.” Cal. Penal Code § 27595(a). Penal Code § 16885(a) defines a “semiautomatic
21 machine-gun convertible pistol” as:

22 [A]ny semiautomatic pistol with a cruciform trigger bar that can be
23 readily converted by hand or with common household tools ... into a
24 machinegun 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.

25 Cal. Penal Code § 16885(a).

26 27. To the best of Plaintiffs’ knowledge, that definition encompasses all
27 Glock semiautomatic handguns and any similar handguns built using a cruciform
28 trigger bar (“Glock-style handguns”). Before AB 1127, certain Glock models could

1 be sold in California because they were grandfathered onto California’s handgun
2 roster. While § 27595(a) contains a few exemptions not relevant to this challenge,¹ for
3 ordinary, peaceable Californians, the law effectively closes the door on traditional
4 commercial sales of these firearms. These models are now banned. AB 1127 is
5 therefore a Glock ban. Violations may be punished by fine and the suspension or
6 revocation of the offending dealer’s license. *See id.* § 27595(b)(1)–(3).

7 28. All factory stock models of Glock pistols have a cruciform trigger bar.
8 This includes Glock’s “Gen 6” and “V series” pistols, which were introduced into the
9 U.S. market in late 2025. The cruciform trigger bar is integral to Glock’s design.
10 Among other things, it ensures that a Glock pistol will not discharge accidentally if
11 dropped.

12 29. The cruciform trigger bar was present in Glock’s patented design by
13 1982. *See* Frank Koppenhagen et al., *The Genesis of the Glock Pistol: How Gaston*
14 *Glock Created the Dominant Design for Handguns* (May 22, 2025). It has thus been
15 a feature of Glock pistols since they were first sold in the U.S. in 1986.

16 30. When Glock’s Gen 3 patent expired in 2020, many companies began
17 producing handguns based on its exceedingly popular design. These pistols are often
18 referred to as Glock-style pistols. Common models include the Palmetto State Armory
19 Dagger, the Ruger RXM, and many Shadow Systems handguns. Factory stock
20 versions of these Glock-style pistols are also designed with a cruciform trigger bar.

21 31. Because factory stock Glock and Glock-style pistols have a cruciform
22 trigger bar, they satisfy AB 1127’s definition of “machine gun convertible pistol” if
23 they are deemed to be “readily convert[ible]” into a machine gun as described in
24

25 ¹ Specifically, § 27595 exempts from coverage “private party to private party
26 transaction[s] conducted through a licensed firearms dealer,” subd. (c)(3), sales to law
27 enforcement officers or transfers for a few discrete purposes, subd. (c)(9), and permits
28 transfers “to any forensic laboratory or forensic laboratory employee, while on duty
and acting within the scope and course of employment,” subd.(c)(8). AB 1127 further
excludes “hammer-fired semiautomatic pistol[s]” as well as “striker-fired
semiautomatic pistol[s] lacking a cruciform trigger bar.” Cal. Penal Code § 16885(b).

1 § 16885(a). There is a substantial likelihood that virtually all Glock and Glock-style
2 pistols will be deemed to qualify as “readily convert[ible].”

3 32. Because the paradigmatic handguns that meet California’s definition of
4 a “semiautomatic machine-gun convertible pistol” were patented and initially
5 manufactured by Glock, Plaintiffs will refer, at times, to the banned firearms as Glocks
6 or Glock-style handguns. For the avoidance of doubt, Plaintiffs challenge the
7 restriction as to *all* semiautomatic pistols with cruciform trigger bars that are banned
8 by California under § 27595(a).

9 33. A pistol converter is a device that can be attached to a pistol which
10 enables the pistol to fire automatically, meaning it will fire more than one round by a
11 single function of the trigger. *See* Cal. Penal Code § 17015. Put differently, a pistol
12 converter is a device that transforms a semiautomatic pistol into a machinegun.

13 34. AB 1127’s author argued that this ban is necessary because Glocks’
14 design allows them to be modified to fire automatically using pistol converters. *See*
15 Cal. Sen. Comm. Public Safety, AB 1127, *Firearms: converter pistols*, at 8 (June 19,
16 2025), available at: <https://perma.cc/6MVM-CY22>; *see also* Cal. Penal Code § 17015.
17 But under California law, pistol converters are already banned because they are
18 defined as machineguns. *See* Cal. Penal Code § 16880(b); *id.* § 32625(a). That
19 prohibition is not at issue in this case.

20 35. These devices are also banned under federal law, which defines
21 “machinegun” to include pistol converters. *See* 26 U.S.C. § 5845(b). With exceptions
22 not relevant here, federal law prohibits the possession, manufacture, transfer, or
23 receipt of a machinegun. *See* 18 U.S.C. § 922(o); 26 U.S.C. § 5861. A violation of
24 these provisions is a felony punishable by up to ten years’ imprisonment and a fine of
25 up to \$250,000. *See* 18 U.S.C. § 924(a)(2); 26 U.S.C. § 5871; 18 U.S.C. § 3571.

26 36. The supplemental claim here is about whether California may ban
27 semiautomatic handguns with a cruciform trigger bar, such as Glock and Glock-style
28 handguns. It cannot.

SUPPLEMENTAL CLAIM FOR RELIEF
VIOLATION OF THE SECOND AND FOURTEENTH AMENDMENTS
(42 U.S.C. § 1983, *Ex parte Young*, 209 U.S. 123 (1908))

37. Plaintiffs incorporate by reference the allegations in paragraphs 1 through 36.

38. The Second Amendment protects “the right of the people to keep and bear Arms.” U.S. CONST. amend. II. This fundamental right is fully applicable to the States through the Fourteenth Amendment. *McDonald v. City of Chicago, Ill.*, 561 U.S. 742 (2010).

39. Textually, the right to “keep and bear” firearms includes the right to acquire them. *See B&L Productions, Inc. v. Newsom*, 104 F.4th 108, 118 (9th Cir. 2024) (“[U]nless the right to *acquire* firearms receives some Second Amendment protection, the right to keep and bear firearms would be meaningless.”).

40. As *Heller* has made clear, the *only* historical justification that could justify banning the possession of a firearm is that the arm is both “dangerous and unusual.” 554 U.S. at 627 (quotation marks omitted). Arms that are “in common use” are, by definition, neither. *Id.* (quotation marks omitted). Thus, in *Heller*, the Supreme Court held that the Second Amendment “protects the possession and use of weapons that are ‘in common use at the time.’” *Bruen*, 597 U.S. at 21 (quoting *Heller*, 554 U.S. at 627); *accord Wolford*, 2026 WL 1825723, at *3, *9.

41. A law that bans the sale of—and correspondingly prevents citizens from acquiring—a weapon in common use violates the Second Amendment.

42. Semiautomatic handguns with cruciform trigger bars are not different from *any* other type of semiautomatic handgun in a constitutionally relevant way.

43. The Supreme Court has already held that handguns are in common use and cannot be banned. *See Heller*, 554 U.S. at 629 (“[H]andguns are the most popular weapon chosen by Americans for self-defense in the home, and a complete prohibition

1 of their use is invalid.”). Semiautomatic handguns, including those with a cruciform
2 trigger bar, therefore, cannot be banned.

3 44. Even considered as their own group (which, under *Heller*, they should
4 not be), the banned handguns are constitutionally protected. They are also
5 unquestionably in common use for lawful purposes. In fact, they are among the most
6 popular handguns in the Nation. *See, e.g., How Glock became America’s gun*, CBS
7 NEWS (Sep. 15, 2013), <https://perma.cc/J5E8-42UA>. Analysts estimate that, as of
8 2020, Glock held nearly 65% of the U.S. market for handguns. According to one
9 source, three Glock handgun models made the top-25 for new guns sold in 2024,
10 placing fourth, seventh, and twenty-second. *See* Logan Metesh, *Top Selling New Guns*
11 *of 2024*, GUNS & AMMO (Jan. 14, 2025), <https://perma.cc/8A5Z-5VQN>. ATF has
12 observed that Glocks are “popular for civilian use.” *See Definition of “Frame or*
13 *Receiver” and Identification of Firearms*, 87 Fed. Reg. 24652, 24655 (Apr. 26, 2022).

14 45. Government data confirm the popularity of these types of handguns. For
15 example, in 2024, Glock manufactured 419,510 handguns in the United States. *See*
16 *Annual Firearms Manufacturing and Export Report* at 15, ATF (2024), available at
17 <https://www.atf.gov/resource-center/data-statistics>. Of those, just 54,932 were
18 exported. *Id.* at 201. It follows that, in 2024 alone, Glock manufactured 364,578
19 handguns for sale in the United States.

20 46. That is to say nothing of imports. In 2021, 5,263,341 handguns were
21 imported into the United States. *See* ATF, *Firearms Commerce in the United States*,
22 at 3 (2024), available at: <https://perma.cc/P689-LX24>. Of those, 1,688,941 were
23 imported from Austria, *id.* at 5, where many Glocks are
24 manufactured, *see* Glock, *Glock Brand*, <https://perma.cc/2UWY-EARR> (last visited
25 September 19, 2025). It is therefore likely that, in 2021 alone, Glock imported
26 hundreds of thousands of handguns for sale in the United States.

47. Glock and Glock-style pistols are generally lawful to sell, acquire, and possess throughout the United States.²

48. Penal Code § 27595(a) bans the sale of constitutionally protected handguns and violates the Second Amendment.

49. Defendants' enforcement of § 27595(a) therefore deprives Plaintiffs of rights secured by the Constitution.

PRAYER FOR RELIEF

Plaintiffs respectfully request that this Court:

1. Declare that Penal Code § 27595(a)'s ban on semiautomatic handguns is unconstitutional under the Second Amendment, both facially and as-applied;
2. Enjoin enforcement of Penal Code § 27595(a)'s ban on semiautomatic handguns with a cruciform trigger bar;
3. Award Plaintiffs reasonable attorney's fees and costs pursuant to 42 U.S.C. § 1988; and
4. Award Plaintiffs other legal and equitable relief as is just and appropriate.

Dated: July 1, 2026

BENBROOK LAW GROUP, PC

By /s/ Bradley A. Benbrook
BRADLEY A. BENBROOK
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² Since AB 1127's passage, a handful of States (Connecticut, Maryland, Massachusetts, and New York) have taken regulatory or legislative action to mimic California's restriction.