

NO SUMMONS ISSUED

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ENDORSED FILED
SUPERIOR COURT
COUNTY OF SAN FRANCISCO

AUG 19 2020

CLERK OF THE COURT
BY: ANGELICA SUNGA
Deputy Clerk

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN FRANCISCO

11
12 **PEOPLE OF THE STATE OF**
CALIFORNIA EX REL. XAVIER
13 **BECERRA, ATTORNEY GENERAL,**
14
Petitioner,
15
v.
16
GS PERFORMANCE, LLC (d/b/a
17 **GLOCKSTORE),**
18
Respondent.

EXEMPT FROM FILING FEES PER GOV.
CODE § 6103

CPF-20-517189

Case No.

**PETITION TO ENFORCE
INVESTIGATIVE SUBPOENA AND
INVESTIGATIVE INTERROGATORIES**

(GOV. CODE, §§ 11180 et seq.)

COPY

By Fax

1 4. In the last several years alone, ghost guns have been used in a number of fatal
2 incidents in the state. In June 2013, a shooter killed five people using an AR-15-type ghost gun
3 rifle in Santa Monica, including Santa Monica College Campus, and, in November 2017, a
4 shooter killed five people and attacked an elementary school using homemade ghost guns and
5 unregistered guns in Rancho Tehama Reserve. More recently, in the fall of 2019, the shooter at
6 Saugus High School in Santa Clarita killed two students and injured three others, using a ghost
7 gun assembled from a kit and parts for a 1911-model handgun. And just a couple months ago, a
8 shooter, allegedly a follower of an anti-government extremist movement, shot and killed a federal
9 security officer and wounded another in front of a federal building in downtown Oakland using a
10 ghost gun, and then later shot and killed a Santa Cruz deputy who came to arrest him.

11 5. In addition to state serialization requirements (see Pen. Code, §§ 29180, 29182),
12 which require firearms registration and background checks, California’s Unsafe Handgun Act,
13 also known as the “handgun roster law,” imposes a series of requirements that include requiring
14 handguns to meet firing and drop safety standards for the protection of gun owners and the
15 public.¹ (*Id.*, §§ 31900(b), 31905, 31910.) Mandated firing and drop safety tests are required to
16 ensure that handguns fire safely and do not accidentally discharge when dropped.

17 6. The Attorney General is investigating whether Glockstore has engaged in unlawful,
18 unfair, or fraudulent practices or false advertising in connection with its advertising and sale of
19 handgun kits and parts for self-manufacture. This includes whether the company misled
20 consumers concerning the legality of self-assembled firearms or their compliance with state
21 safety requirements. (See Bus. & Prof. Code, §§ 17200 *et seq.*, 17500 *et seq.*)

22 7. In the fall of 2019, the Attorney General issued an investigative subpoena and
23 interrogatories to Glockstore seeking information about the above business practices.

24 8. The subpoena sought documents related to the advertising and sale of handgun kits or
25 parts for self-assembly, including advertisements and instructions or educational information
26 provided to consumers, internal documents concerning the legality of self-assembly handguns and

27 _____
28 ¹ There are some exceptions to these requirements for single-action revolvers or single
shot pistols that meet certain specifications. (Pen. Code, § 32100.)

1 Glockstore’s related business practices, and communications with and complaints from
2 consumers.

3 9. The interrogatories similarly sought information concerning Glockstore’s advertising
4 and sale of handgun kits or parts for self-assembly, including identification of products offered
5 for sale, sales data, and publication dates, circulation, and number of views information for
6 advertisements and instructional or other educational materials provided to consumers.

7 10. In response, Glockstore has failed to respond to one interrogatory, Interrogatory No.
8 6, and provided incomplete or partial responses to seven others, Interrogatory Nos. 2-5 and 7-9.
9 It also failed to sufficiently search for or produce documents in response to ten subpoena requests,
10 Request Nos. 3-5 and 14-20.

11 11. The Attorney General made several attempts to meet and confer with Glockstore in
12 January and February 2020 and July 2020 concerning issues and deficiencies in its responses.
13 Most recently, the Attorney General sent Glockstore a letter describing the issues and deficiencies
14 in its responses on July 2, 2020 and requested a written response and any production by July 16,
15 2020. However, Glockstore has not responded to or otherwise contacted the Attorney General
16 since late January 2020.

17 12. The requested documents and information are critical to evaluating Glockstore’s
18 compliance with consumer protection laws in connection with its advertising and sale of self-
19 assembly handgun kits and parts.

20 13. Accordingly, the People petition this Court pursuant to section 11188 of the
21 Government Code to enforce compliance with the Attorney General’s investigative subpoena and
22 interrogatories.

23 **THE PARTIES**

24 14. Petitioner Xavier Becerra is the Attorney General of the State of California. He
25 brings this action solely in his official capacity on behalf of the People of the State of California.

26 15. Glockstore is a Tennessee limited liability company with a retail location in San
27 Diego, California and an online store. Glockstore’s primary place of business in the state is the
28 retail location in San Diego, California. Glockstore sells Glock factory and Sig Sauer factory

1 handguns, custom-build handguns and aftermarket parts, and handgun kits and parts that are used
2 to self-assemble Glock and Sig Sauer-type handguns. Glockstore first registered to do business in
3 the State of California in September 2019. From at least 2010 until September 2019, Glockstore
4 was owned and operated by a predecessor entity, LMP/Mail Order Video, Inc., a California
5 corporation headquartered in San Diego.

6 JURISDICTION AND VENUE

7 16. Jurisdiction and venue are proper in the Superior Court of the State of California in
8 the City and County of San Francisco under Government Code section 11186. The Attorney
9 General primarily conducts the investigation into Glockstore in the City and County of San
10 Francisco, and the documents at issue are designated to be produced there.

11 THE ATTORNEY GENERAL'S INVESTIGATIVE AUTHORITY

12 17. The Attorney General is the chief law enforcement officer of the State of California.
13 He is responsible for enforcing the state's laws relating to consumer protection, unfair
14 competition, and false advertising, among others. In order to carry out these duties effectively,
15 California law gives the Attorney General broad investigative powers.

16 18. Specifically, Government Code sections 11180 *et seq.* grant the Attorney General, as
17 head of the Department of Justice, the authority to issue subpoenas and promulgate
18 interrogatories. (See Gov. Code, § 11181, subd. (e), (f).) The Attorney General may use these
19 powers for various reasons, including assisting him in considering possible prosecutorial actions,
20 proposing legislation, and formulating enforcement policies with other agencies. (Gov. Code, §
21 11180; *Younger v. Jensen* (1980) 26 Cal.3d 397, 404-406.)

22 19. These investigative powers are not dependent on the initiation of a civil lawsuit or an
23 administrative proceeding. (*Brovelli v. Super. Ct. of L.A. County* (1961) 56 Cal.2d 524, 529
24 (quoting *United States v. Morton Salt Co.* (1950) 338 U.S. 632, 642-43).) The Attorney General
25 has broad discretion and may investigate based on suspicion that the law is being violated or to
26 determine that it is not. (*Ibid.*) If a party disobeys a subpoena, the Attorney General may petition
27 the Superior Court for enforcement. (Gov. Code, § 11187.)
28

THE ATTORNEY GENERAL'S INVESTIGATION

1
2 20. California law grants the Attorney General the authority to investigate any potentially
3 unlawful, unfair, deceptive, fraudulent, or otherwise improper business act or practice, and any
4 unfair, deceptive, untrue, or misleading advertising. Pursuant to this authority, the Attorney
5 General initiated an investigation into Glockstore's potentially deceptive and illegal marketing or
6 sale of firearm parts and kits.

7 21. In relation to this investigation, the Attorney General sought information concerning
8 Glockstore's compliance with California consumer protection laws with respect to its marketing
9 and sale of handgun kits and parts for self-manufacture. (Bus. & Prof. Code, §§ 17200 *et seq.*,
10 17500 *et seq.*; see also Pen. Code §§ 29180 *et seq.*, 31910 *et seq.*, 32000 *et seq.*)

11 22. Glockstore operates a retail location in San Diego and an online store. Glockstore
12 sells Glock factory and Sig Sauer factory handguns and parts, custom-build handguns under its
13 own brand ("GSPC"), and Glock-compatible and Sig Sauer-compatible aftermarket parts. It also
14 sells gun kits and parts that a consumer can use to assemble a Glock-type or Sig Sauer-type
15 "ghost gun." In addition, Glockstore offers services for installing aftermarket parts on customers'
16 Glock pistols.

17 23. In particular, Glockstore sells items that it refers to as "80% Build Kits" on its
18 website. These include complete kits, as well as parts and tools sold separately, that are used to
19 build fully-operational semi-automatic handguns that may be used as ghost guns. For example,
20 two of the products it has offered for sale include the "Syndicate Kit" and the "Polymer80 Buy
21 Build Shoot Kit," which include all of the parts and tools needed to assemble a Glock compatible
22 handgun. Glockstore also offers products such as the "SS80 80% Lower," "SS80 Builder Tool
23 Set," "Complete Upper for Glocks," and the "G43 Complete Lower Parts Kit," which together
24 can be used to build a Glock-type handgun.

25 24. Through how-to videos and blog posts on its website and various social media
26 platforms, Glockstore instructs consumers on how to build a handgun using the above kits, parts,
27 and tools. It also provides consumers with information regarding federal and California firearms
28 laws, including the legality of self-assembling firearms.

1 25. The above kits and handgun parts and tools may be purchased at Glockstore’s retail
2 location in San Diego or ordered online and shipped for delivery to an address in California.

3 26. Glockstore may have violated, and may continue to violate, consumer protection laws
4 in a number of ways, including but not limited to deceptive marketing regarding the legality of
5 self-manufacturing handguns and whether such handguns would meet state safety requirements.
6 (Bus. & Prof. Code, §§ 17200 *et seq.*) and False Advertising Law (Bus. & Prof. Code, §§ 17500
7 *et seq.*).

8 **THE INVESTIGATIVE SUBPOENA AND INVESTIGATIVE INTERROGATORIES**

9 27. On October 22, 2019, the Attorney General, acting through officers of the
10 Department of Justice to whom he had delegated investigative authority under section 11182 of
11 the Government Code, served LMP/Mail Order Video, Inc. (d/b/a Glockstore), the entity which
12 owned and operated Glockstore up until September 2019, with an investigative subpoena and
13 investigative interrogatories. LMP/Mail Order Video, Inc. was served in accordance with
14 Government Code section 11184. (See Gov. Code, § 11187, subd. (b)(2).) True and correct
15 copies of the subpoena, interrogatories, and proof of service are attached hereto as Exhibits A, B,
16 and C, respectively, and are incorporated into this petition. The subpoena and interrogatories,
17 respectively, provided notice of the time and place for the production of papers and for answering
18 the interrogatories. (*Id.*, § 11187, subd. (b)(1).) The subpoena and interrogatories gave
19 LMP/Mail Order Video, Inc. thirty days to respond, which passed on November 21, 2019.

20 28. The Attorney General subsequently learned that LMP/Mail Order Video, Inc. had
21 merged into a newly created Tennessee limited liability company, GS Performance, LLC.

22 29. To ensure proper notice and service for purposes of enforcement, on November 25,
23 2019, the Attorney General, acting through officers of the Department of Justice to whom he had
24 delegated investigative authority under section 11182 of the Government Code, served GS
25 Performance, LLC with an identical subpoena and interrogatories, naming the new entity. GS
26 Performance, LLC was properly served in accordance with Government Code section 11184.
27 (See Gov. Code, § 11187, subd. (b)(2).) True and correct copies of the subpoena, interrogatories,
28 and proof of service are attached hereto as Exhibits D, E, and F, respectively, and are

1 incorporated into this petition. The subpoena and interrogatories, respectively, provided notice of
2 the time and place for the production of papers and for answering the interrogatories. (*Id.*, §
3 11187, subd. (b)(1).) The subpoena and interrogatories gave GS Performance, LLC (i.e.,
4 Glockstore) fifteen days to respond, which passed on December 10, 2019.

5 30. The same person accepted service on behalf of both the predecessor and current
6 Glockstore (LMP/Mail Order Video, Inc. and GS Performance, LLC) and on both occasions she
7 indicated she was authorized to do so. (Exhibits C and F.)

8 31. To date, Glockstore has not challenged the service or validity of either set of
9 investigative subpoena and interrogatories.

10 32. Both sets of the subpoena and interrogatories (attached as Exhibits A-F) were
11 regularly issued in connection with the Attorney General's investigation into firearms and other
12 weapons. The subpoena seeks the following relevant materials related to Glockstore's
13 manufacturing, sales, marketing, and advertising practices:

- 14 a. Documents related to the advertising, sale, and offering for sale of component
15 parts or tools that can be used to manufacture a handgun, including
16 advertisements, policies and procedures, and communications;
- 17 b. Documents related to providing information to California consumers regarding
18 the self-manufacture of a handgun, including any instructional or educational
19 materials, advertisements, communications, and policies and procedures;
- 20 c. Documents and communications related to the lawfulness of advertising, selling,
21 or offering for sale component parts or tools that can be used to manufacture a
22 handgun;
- 23 d. Documents and communications related to the lawfulness of providing
24 information to consumers regarding the self-manufacture of a handgun;
- 25 e. Complaints made by California consumers and related documents and
26 communications;
- 27 f. Policies and procedures related to consumer complaints;
- 28 g. Policies and procedures related to age verification for purchases; and

1 h. Documents sufficient to identify the makeup or composition of particular
2 products.

3 33. Similarly, the interrogatories seek information in the relevant areas of 24(a)-(j),
4 *supra*, as well as specifically:

5 a. Sales data for component parts or tools that can be used to manufacture a
6 handgun that were sold to California consumers (e.g., price, purchaser, nature of
7 sale, and delivery information);

8 b. Publication data for advertisements for component parts or tools that can be used
9 to manufacture a handgun directed to California consumers (e.g., identity of
10 publication, dates available, and number of views or circulation); and

11 c. Publication data for advertisements or instructional materials relating to the
12 manufacture of a handgun directed to California consumers (e.g., identity of
13 publication, dates available, and number of views or circulation).

14 34. The above information is necessary to investigate Glockstore's compliance with
15 consumer protection laws. Specifically, the information requested relates directly to Glockstore's
16 advertising and sale of handgun kits and parts and any representations to consumers concerning
17 how to self-assemble firearms or their compliance with state safety requirements.

18 **GLOCKSTORE HAS FAILED TO ADEQUATELY AND SUBSTANTIVELY RESPOND**

19 35. On December 18 and 20, 2019, the Attorney General's Office met and conferred with
20 Glockstore and agreed to modify and narrow the scope of certain requests in the subpoena for the
21 purposes of Glockstore's initial document production, reserving rights to seek documents
22 responsive to the full requests.

23 36. On December 20, 2019, Glockstore provided a partial response to the investigative
24 interrogatories that failed to sufficiently address eight of the interrogatories.

25 37. On January 3, 2020, Glockstore provided written objections and a document
26 production in response to the investigative subpoena, which failed to properly respond to ten
27 subpoena requests.

28

1 38. Glockstore's interrogatory responses are significantly deficient. Glockstore has
2 provided incomplete or partial responses to Interrogatory Nos. 2-5 and 7-9, has failed to provide a
3 substantive response to Interrogatory No. 6, and has refused to respond to the majority of
4 Interrogatory No. 3.

5 39. Interrogatory Nos. 2 and 4 seek the identification of self-assembly handgun kits or
6 parts offered for sale and information related to the make and model and composition of certain
7 items, respectively. In response, Glockstore failed to identify at least several responsive items of
8 which the Attorney General is aware, including the Polymer80 Buy Build Shoot Kit, suggesting
9 the responses are incomplete and additional items may be missing.

10 40. Interrogatory No. 3 seeks sales information for each of the self-assembly kits and
11 parts sold, including purchase price, date of sale, purchaser identity and contact information,
12 method of sale and delivery, and pickup information. In response, Glockstore has identified only
13 its warehouse and shipping location, and refused to respond to the remainder of the request.

14 41. Interrogatory Nos. 5-8 seek web addresses, dates available online, and number of
15 page views for Glockstore's Internet advertisements for handgun kits and parts or related to self-
16 assembly of a handgun. In response, Glockstore has failed to respond with respect to at least four
17 of its social media sites and portions of its website, and it appears to have conducted an
18 insufficient search for dates and views information requested.

19 42. Interrogatory No. 9 seeks identification of print advertisements for self-assembly
20 handgun kits or parts and publication data and circulation information. In response to a related
21 subpoena request, Glockstore has produced only two print catalogs, though it appears at least two
22 others exist. Thus, it appears Glockstore has failed to identify all responsive print advertisements
23 or conduct an adequate search for them. Moreover, it has not provided information as to dates of
24 circulation and number of copies distributed in California, though from its response it appears to
25 have at least some responsive information in its possession.

26 43. Glockstore's production in response to the subpoena requests is also inadequate. It
27 appears that Glockstore has failed to sufficiently search for or produce documents in response to
28

1 Request Nos. 3-5 and 14-20. In some cases, Glockstore appears to have not searched at all for
2 entire categories of responsive documents.

3 44. As agreed during meet and confer and in consideration of the fact that Glockstore was
4 responding *pro se*, the Attorney General both narrowed the scope of requests for Glockstore's
5 advertisements or instructional materials related to self-assembly handguns and required only that
6 Glockstore produce non-publicly available information for its initial production. In other words,
7 Glockstore was not required to search for and produce responsive advertisements on its website
8 or any of its social media sites that were publicly accessible, of which there are many.
9 Nonetheless, it appears that Glockstore has failed to adequately search for or produce responsive
10 non-publicly available information.

11 45. Request Nos. 3-5 seek representative copies of advertisements for self-assembly kits
12 or advertisements or instructional information provided to consumers related to self-assembly of a
13 handgun. In response, Glockstore has produced only two print catalogs, though it appears from
14 social media sites that at least two others may exist, and there may be others. It also appears that
15 Glockstore has failed to search for outgoing email advertisements at all.

16 46. Request Nos. 14-18 seek documents and communications relating to the lawfulness of
17 advertising or selling handgun kits and parts, or of providing instructions or educational
18 information to consumers related to self-assembly of firearms. Glockstore has not produced any
19 responsive internal documents, and it appears that it has failed to conduct an adequate search for
20 this category of documents at all.

21 47. Request Nos 19-20 seek communications with California consumers relating to self-
22 assembly of a handgun and complaints from California consumers related to the sale of self-
23 assembly handgun kits or parts, respectively. Glockstore has produced a set of email
24 communications, purportedly responsive to the request for consumer complaints. But that
25 production appears incomplete and contains significant gaps, covering only the period from July
26 2017 to July 2018 and March 2019 to December 2019. Moreover, it appears that Glockstore has
27 failed to adequately search for and produce any email advertisements responsive to Request No.
28 19.

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Dated: August 19, 2020

Respectfully Submitted,
XAVIER BECERRA
Attorney General of California
NICKLAS A. AKERS
Senior Assistant Attorney General
JINSOOK OHTA
Supervising Deputy Attorney General



VESNA CUK
Deputy Attorney General
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EXHIBIT A

1 XAVIER BECERRA
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7

8
9
10 BEFORE THE DEPARTMENT OF JUSTICE
11 OFFICE OF THE ATTORNEY GENERAL
12 STATE OF CALIFORNIA
13

14 In the Matter of the Investigation of:
15 **FIREARMS AND OTHER WEAPONS**

INVESTIGATIVE SUBPOENA

GOV. CODE § 11180, ET SEQ.

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22 NOTICE TO THE PERSON SERVED:

23 You are served on behalf of:

LMP/MAIL ORDER VIDEO, INC.

(d/b/a GLOCKSTORE)

1
2 Pursuant to the powers conferred by Article 2 of Chapter 2 of Division 3 of Title 2 (Cal.
3 Gov. Code, § 11180 et seq.) of the Government Code of California, on the Attorney General, as
4 head of the California Department of Justice, which powers and authority to conduct the above
5 entitled investigation have been delegated to the undersigned, an officer of that Department,
6

7 **LMP/MAIL ORDER VIDEO, INC. (d/b/a GLOCKSTORE)**
8

9 (hereinafter "WITNESS") **IS HEREBY COMMANDED** to produce the documents, books,
10 records, papers and other items (collectively "Items") described in Attachment A to this
11 Investigative Subpoena which are in WITNESS'S custody, possession or control, or the custody,
12 possession or control of WITNESS'S subsidiaries, affiliates, parents, predecessors, successors,
13 employees, partners, officers, agents or representatives, whether or not the present location of any
14 of the Items designated is in California, at the California Department of Justice, Office of the
15 Attorney General, 1300 I Street, Sacramento, CA 95814, ATTN: Deputy Attorney General Vesna
16 Cuk, within thirty days of service hereof.

17 **INSTRUCTIONS FOR COMPLIANCE**

- 18 1. The Items shall be accompanied by a completed declaration of custodian of records in
19 compliance with Evidence Code sections 1560, 1561, 1562, and 1271.
- 20 2. The Relevant Time Period of this subpoena is July 1, 2010 through the final response date
21 of this subpoena unless otherwise expressly stated herein. All responsive Items created,
22 maintained or altered during the Relevant Time Period must be produced unless otherwise
23 expressly stated in Attachment A to this subpoena.
- 24 3. If WITNESS claims that an Item or a portion of an Item is privileged and WITNESS
25 withholds it from production for that reason, WITNESS must create and submit a privilege log
26 which lists: (1) the author(s) and their capacities; (2) the recipients (including cc's and bcc's) and
27 their capacities; (3) other individuals with access to the document and their capacities; (4) the
28 type of document; (5) the subject matter of the document; (6) the purpose(s) for the production of

1 the document; (7) the date on the document; and (8) a detailed explanation setting forth the
2 factual and legal basis for your claim that the document is privileged or otherwise immune from
3 production.

4 4. To the extent responsive Items exist in an electronic or computerized format, please contact
5 the officer issuing this subpoena to discuss the manner and format in which the Items are to be
6 produced so as to facilitate the production of full and complete copies in a usable format. In the
7 absence of an agreement regarding the manner and format of production, the following
8 instructions shall apply:

9 a. The information shall be provided on CD/DVD or external hard drive formatted as
10 follows: (1) Native files converted to bates numbered single page tiff files; (2) multi-page text
11 files named based on the associated bates number containing extracted or OCR text; (3) image
12 load files in Opticon or Ipro format; (4) Concordance data file to include all metadata fields
13 including Sha-1 hash value and attachment range for compound documents; (5) any Excel
14 document or native document that includes formulas in a native file format; (6) any audio files in
15 a WAV file format; and (7) any video files in an AVI file format.

16 b. The response shall include all Documents and computer programs necessary to the
17 accurate conversion, analysis, and review of the electronic data, including but not limited to
18 operating instructions, manuals and user guides, keys, legends, and codes for systems, programs,
19 files, and data fields.

20 5. This Investigative Subpoena has been issued in connection with an investigation within the
21 scope of section 131 of the California Penal Code.

22 6. No Item requested herein shall be destroyed or discarded by WITNESS until the Attorney
23 General has made a written determination that the Item in question is not necessary for
24 furtherance of this investigation.

25 7. When producing Items, identify by number the request(s) on Attachment A to which the
26 Item is responsive.

27
28

1 **DEFINITIONS**

2 A. "80% LOWER" means a firearm receiver blank, "casting," "machined body," or unfinished
3 handgun frame, in which the fire-control cavity area is completely solid and un-machined and has
4 not reached the "stage of manufacture," as defined by the U.S. Bureau of Alcohol, Tobacco,
5 Firearms, and Explosives (ATF), and includes, but is not limited to, items commonly referred to
6 as "80% lower," "80% lower receiver," "unfinished receiver," and "80% receiver." This term
7 includes, but is not limited to, the SS80 80% Lower, any "Polymer80" 80% Lower, and the "P80
8 frame" that is part of the "Syndicate Kit," sold by YOU as shown in Exhibit 1 attached hereto.

9 B. "80% BUILD KIT" means any combination of component parts or tools that can be used to
10 MANUFACTURE a handgun made with an 80% LOWER, with or without additional component
11 parts or tools. This term includes, but is not limited to, all the items sold by YOU under the
12 heading 80% BUILD KITS, as shown in Exhibit 1 attached hereto, such as the following types of
13 products:

- 14 a. 80% LOWER,
- 15 b. "Upper Parts Kit,"
- 16 c. "Lower Parts Kit,"
- 17 d. "Polymer80 Buy Build Shoot Kit,"
- 18 e. "Slides,"
- 19 f. "Pyramid Trigger,"
- 20 g. "Builder Tool Set,"
- 21 h. "Syndicate Kit," and
- 22 i. "Upper."

23 C. "ADVERTISING" and "ADVERTISEMENT" mean any information disseminated or
24 circulated by YOU for the purposes of promoting, marketing, selling, or providing information or
25 instruction RELATING TO any products sold by YOU or YOUR stores. The terms include,
26 without limitation, web pages, videos, commercials, blog posts, social media posts, handouts,
27 brochures, catalogues, or any other marketing materials or ADVERTISEMENTS via Internet,
28 print, mail, radio, or television.

1 D. "COMMUNICATION" and "COMMUNICATIONS" mean every disclosure, transfer,
2 exchange or transmission of information, whether oral, written, or electronic, and whether face-
3 to-face, by telecommunications, telephone, computer, mail, email, text message, instant message,
4 telecopier, facsimile (fax) machine, or otherwise, including attachment(s).

5 "COMMUNICATION" and "COMMUNICATIONS" mean all "writings" as defined in
6 California Evidence Code section 250.

7 E. "COMPLAINTS" means any expression of dissatisfaction RELATING TO YOUR stores,
8 products, business practices, ADVERTISING, or provision of INSTRUCTIONAL or
9 EDUCATIONAL MATERIALS OR INFORMATION, including, but not limited to, written
10 complaints, oral complaints, and formal allegations, either brought to YOU or filed with a
11 government, judicial, or administrative body.

12 F. "DOCUMENT" means, without limitation, any "writing," as defined in Evidence Code
13 section 250 and includes originals (as defined in Evidence Code section 255) or duplicates (as
14 defined in Evidence Code section 260) of or copies of the writings, and non-identical copies
15 bearing or having any attachments, notes or marks which distinguish them from the originals, and
16 any electronic records, including, without limitation, electronic mail, spreadsheets, word
17 processing files, and records saved as .pdf or other electronic files. Electronic mail subject to this
18 Subpoena includes messages and attachments now only available on backup or archive tapes or
19 disks. If a print-out of an electronic record is a non-identical copy of the electronic version (for
20 example), because the print-out has a signature, handwritten notation, or other mark or attachment
21 not included in the computer DOCUMENT), both the electronic version in which the
22 DOCUMENT was created and the original print-out must be produced.

23 G. "INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION" means
24 any information disseminated or provided by YOU for the purposes of informing, educating, or
25 instructing consumers on a topic. The term includes, without limitation, web pages, videos,
26 commercials, blog posts, social media posts, handouts, brochures, catalogues, or any other
27 INSTRUCTIONAL OR EDUCATIONAL MATERIALS provided via Internet, print, mail, radio,
28 or television.

1 H. "INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION
2 RELATING TO the MANUFACTURE of a handgun" includes without limitation
3 INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION RELATED TO
4 the lawfulness of MANUFACTURING a handgun and instructions on how to MANUFACTURE
5 a handgun.

6 I. "MANUFACTURE" and "MANUFACTURING" mean to manufacture, assemble,
7 fabricate, construct, or build. The terms include MANUFACTURE by an individual who is not a
8 Federal Firearms Licensee (FFL), sometimes referred to as "self-manufacture."

9 J. "PERSON" or "PERSONS" mean any natural person, corporation, company, partnership,
10 joint venture, firm, licensee, affiliate, subsidiary, association, proprietorship, agency, board,
11 authority, commission, office or other business or legal entity, whether private or governmental.

12 K. "RELATING TO," "RELATED TO," and "IN RELATION TO" mean constituting,
13 containing, concerning, discussing, describing, analyzing, identifying, referring to, relating to,
14 referencing, documenting, governing, regulating, directing, evidencing, or stating.

15 L. "YOU," "YOUR," and "GLOCKSTORE" mean LMP Mail Order Video, Inc., GlockStore,
16 The Glock Store, Glockstore.com, Digital Retail Display, Gun Video, Lenny Magill Productions,
17 Magill's Glockstore Performance & Custom, Nevada Distribution Center, San Diego Sewing
18 Company, Time Zone Internet, Time Zone Multimedia, Time Zone Video,
19 Undertechundercover.com, Website Advertising Network, Youreeka Two, as well as each of their
20 subsidiaries, affiliates and parents, predecessors and successors, and all employees, partners,
21 officers, agents, and representatives of each of them.

22 M. "and" and "or" have both conjunctive and disjunctive meanings.

23
24
25 FAILURE TO COMPLY WITH THIS SUBPOENA WILL SUBJECT YOU TO THE
26 PROCEEDINGS AND PENALTIES PROVIDED BY LAW.

27
28

1 Dated: October 21, 2019

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VESNA CUK
Deputy Attorney General

1 8. All DOCUMENTS reflecting YOUR policies and procedures RELATING TO the provision
2 of INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION RELATING
3 TO the MANUFACTURE of a handgun to (a) California consumers and (b) consumers
4 nationwide, including without limitation all handbooks, guidelines, scripts, talking points,
5 operating manuals, and training manuals.

6 9. All DOCUMENTS reflecting YOUR policies and procedures RELATING TO
7 manufacturing or causing to manufacture, importing for sale, keeping for sale, offering or
8 exposing for sale, selling, or ADVERTISING of 80% LOWERS in California.

9 10. ALL DOCUMENTS reflecting YOUR policies and procedures RELATING TO the
10 manufacture or causing to manufacture, import for sale, keeping for sale, offering or exposing for
11 sale, selling, or ADVERTISING of products that are defective, damaged, unsafe, unlawful, or not
12 as they appear or as described in YOUR ADVERTISING or on YOUR website, to (a) California
13 consumers and (b) consumers nationwide, including without limitation all handbooks, guidelines,
14 scripts, talking points, operating manuals, and training manuals.

15 11. ALL DOCUMENTS reflecting YOUR policies and procedures RELATING TO
16 COMPLAINTS made by (a) California consumers and (b) consumers nationwide IN RELATION
17 TO the sale, offering or exposing for sale, or ADVERTISING of products alleged to be defective,
18 damaged, unsafe, unlawful, or not as they appear or as described in YOUR ADVERTISING or on
19 YOUR website, including without limitation all handbooks, guidelines, scripts, talking points,
20 operating manuals, and training manuals.

21 12. All DOCUMENTS reflecting YOUR policies and procedures RELATING TO orders for
22 YOUR products made by (a) California consumers and (b) consumers nationwide, including
23 without limitation regarding order processing and fulfillment, payment, shipping, returns, refunds,
24 and out of stock or backordered items (including failure to provide notification thereof), and
25 including without limitation all handbooks, guidelines, scripts, talking points, operating manuals,
26 and training manuals.

27 13. All DOCUMENTS reflecting YOUR policies and procedures RELATING TO
28 COMPLAINTS IN RELATION TO orders for YOUR products made by (a) California

1 consumers and (b) consumers nationwide, including without limitation regarding order processing
2 and fulfillment, payment, shipping, returns, refunds, and out of stock or backordered items
3 (including failure to provide notification thereof), and including without limitation all handbooks,
4 guidelines, scripts, talking points, operating manuals, and training manuals.

5 14. All DOCUMENTS and COMMUNICATIONS RELATING TO the lawfulness of the
6 MANUFACTURE of a handgun from component parts or tools in California by an individual
7 who is not a Federal Firearms Licensee (FFL).

8 15. All DOCUMENTS and COMMUNICATIONS RELATING TO the lawfulness of the sale,
9 offering or exposing for sale, or ADVERTISING of any component parts or tools or combination
10 thereof that can be used to MANUFACTURE a handgun to (a) California consumers and (b)
11 consumers nationwide.

12 16. All DOCUMENTS and COMMUNICATIONS RELATING TO the lawfulness of
13 ADVERTISING RELATED TO the MANUFACTURE of a handgun to (a) California consumers
14 and (b) consumers nationwide.

15 17. All DOCUMENTS and COMMUNICATIONS RELATING TO the lawfulness of the
16 provision of INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION
17 RELATING TO the MANUFACTURE of a handgun to (a) California consumers and (b)
18 consumers nationwide.

19 18. All DOCUMENTS and COMMUNICATIONS RELATING TO the lawfulness of
20 manufacturing or causing to manufacture, importing for sale, keeping for sale, offering or
21 exposing for sale, selling, or ADVERTISING of 80% LOWERS in California.

22 19. All COMMUNICATIONS with California consumers RELATING TO the
23 MANUFACTURE of a handgun, including without limitation regarding INSTRUCTIONAL OR
24 EDUCATIONAL MATERIALS OR INFORMATION.

25 20. All DOCUMENTS RELATING TO COMPLAINTS from California consumers
26 RELATED TO the sale, offering or exposing for sale, or ADVERTISING of component parts or
27 tools that can be used to MANUFACTURE a handgun, including without limitation with respect
28 to the items sold on YOUR website under the heading 80% BUILD KITS.

1 21. All DOCUMENTS RELATING TO COMPLAINTS from California consumers
2 RELATED TO the sale, offering or exposing for sale, or ADVERTISING of products alleged to
3 be defective, damaged, unsafe, unlawful, or not as they appear or as described in YOUR
4 ADVERTISING or on YOUR website.

5 22. All DOCUMENTS RELATING TO COMPLAINTS from California consumers
6 RELATED TO orders for YOUR products, including without limitation regarding order
7 processing and fulfillment, payment, shipping, returns, refunds, and out of stock or backordered
8 items (including failure to provide notification thereof).

9 23. DOCUMENTS sufficient to identify (a) all “pyramid trigger(s)” that YOU caused to be
10 manufactured, imported for sale, kept for sale, offered or exposed for sale, sold, or
11 ADVERTISED in California, (b) the make, model, brand, and/or manufacturer of the units, and
12 (c) the physical makeup or composition of the units.

13 24. All DOCUMENTS RELATING TO the safety of any “pyramid trigger” identified in
14 response to Request No. 23, above.

15 25. DOCUMENTS sufficient to identify (a) all 80% LOWERS that YOU manufactured or
16 caused to be manufactured, imported for sale, kept for sale, offered or exposed for sale, sold, or
17 ADVERTISED in California, (b) the make, model, brand, and/or manufacturer of the units, and
18 (c) the physical makeup or composition of the units.

19 26. All DOCUMENTS RELATING TO the safety of any 80% LOWER identified in response
20 to Request No. 25, above.

21 27. All DOCUMENTS reflecting YOUR policies and procedures RELATING TO age
22 verification of California consumers who attempt to purchase or purchase from YOU any
23 component parts or tools or combination thereof that can be used to MANUFACTURE a
24 handgun, including, but not limited to, the items sold on YOUR website under the heading 80%
25 BUILD KITS.

26 28. All DOCUMENTS referred to or relied upon in your responses to the set of investigative
27 interrogatories served contemporaneously with this subpoena.
28

EXHIBIT 1

THE WORLD'S #1 SOURCE FOR GLOCK PARTS & ACCESSORIES

HELLO. SIGN IN OR REGISTER

MY CART 0



SEARCH FOR PRODUCTS



LIVE CHAT

For Expert Glock Advice Call Toll Free
800-601-8273
Glock Armorers On Duty 7 Days A Week

(/)

HANDGUNS (/HANDGUNS)

MAGAZINES (/MAGAZINES)

PARTS & ACCESSORIES (/PARTS-ACCESSORIES)

CUSTOMIZE (/CUSTOMIZE)

COMPETITION (/COMPETITION)

CONCEALMENT (/CONCEALMENT)

HOLSTERS (/HOLSTERS)

APPAREL & GEAR (/APPAREL-GEAR)

MISC (/MISC)

PARTS BY GLOCK MODEL (/PART-MODEL)

VIDEOS (HTTP://COMMUNITY.GLOCKSTORE.COM/VIDEO/)

BLOG (HTTP://COMMUNITY.GLOCKSTORE.COM/)

FORUM (HTTP://COMMUNITY.GLOCKSTORE.COM/DISCUSSION/)

OVER \$100 SHIPS FREE (https://www.glockstore.com/free-shipping-policy) 30-DAY GUARANTEE (https://www.glockstore.com/shipping-and-returns) TOPSHOT TUESDAY (https://www.glockstore.com/tst-ff-sign-up) TRAINING (https://www.glockstore.com/training) FREE CATALOG (https://www.glockstore.com/request-catalog) NEW PRODUCTS (https://www.glockstore.com/Misc/new-products)

TOP 5 GLOCK UPGRADES

(https://www.glockstore.com/top5home)

CUSTOM GLOCK GALLERY

(https://www.glockstore.com/custom-build-gallery)

GS CUSTOM GUN SHOP

(https://www.glockstore.com/custom)

HOME (/) / PARTS & ACCESSORIES (/PARTS-ACCESSORIES) / 80% BUILD KITS

80% BUILD KITS

GRID VIEW

(/PARTS-ACCESSORIES/POLYMER80) LIST VIEW



(/PARTS-ACCESSORIES/POLYMER80?DISPLAY=LIST)

Sort by relevance

PYRAMID TRIGGER (/PARTS-ACCESSORIES/PYRAMID-TRIGGERS)

FLAT FACE PYRAMID TRIGGER (/PARTS-ACCESSORIES/FLAT-FACE)

80% BUILD KITS (/PARTS-ACCESSORIES/POLYMER80)

PERFORMANCE PARTS (/PARTS-ACCESSORIES/PERFORMANCE-PARTS)

EXTENDED CONTROLS (/PARTS-ACCESSORIES/EXTENDED-CONTROLS)

SEE MORE



(/SS80-M-Model)

★★★★★

SS80 80% LOWER (/SS80-M-MODEL)

\$129.99



(/Glock-Factory-Complete-Upper-Parts-Kit-for-Glock-43)

★★★★★

G43 COMPLETE UPPER PARTS KIT (/GLOCK-FACTORY-COMPLETE-UPPER-PARTS-KIT-FOR-GLOCK-43)

\$119.99



(/G43-Complete-Lower-Parts-Kit)

★★★★★

G43 COMPLETE LOWER PARTS KIT (/G43-COMPLETE-LOWER-PARTS-KIT)

\$89.99



(/Polymer80-Buy-Build-Shoot-Kit)

★★★★★

POLYMER80 BUY BUILD SHOOT KIT (/POLYMER80-BUY-BUILD-SHOOT-KIT)

\$575.00

FILTERED BY:

BRAND



COLOR



GENERATION



GUN MODEL



HAND



STAINLESS STEEL PYRAMID CUT

(/GS-G43-Slides)

★★★★★

GS G43 SLIDES (/GS-G43-SLIDES)

\$250.00



(/Complete-Pyramid-Trigger)

★★★★★

COMPLETE PYRAMID TRIGGER (/COMPLETE-PYRAMID-TRIGGER)

\$179.99



(/Ultimate-Pyramid-Trigger)

★★★★★

ULTIMATE PYRAMID TRIGGER (/ULTIMATE-PYRAMID-TRIGGER)

\$249.99



(/SS80-Build-Set)

★★★★★

SS80 BUILDER TOOL SET (/SS80-BUILD-SET)

\$20.00

PRICE

\$20.00



\$1,200.00



SHOWN WITH S2 OPTION
(/Syndicate-Compact-Kit)



SYNDICATE KIT
(/SYNDICATE-COMPACT-KIT)

\$1,200.00



(/80-P320-Compatible-Insert-MUP-1)



80% P320 COMPATIBLE
INSERT - MUP-1 (/80-P320-COMPATIBLE-INSERT-MUP-1)

\$100.00



(/Jig-for-80-P320-Compatible-Insert-MUP-1)



JIG FOR 80% P320
COMPATIBLE INSERT -
MUP-1 (/JIG-FOR-80-P320-COMPATIBLE-INSERT-MUP-1)

\$150.00



(/Polymer-80-PF45-Textured-Full-Size-Lower)



POLYMER 80 PF45 LARGE
FRAME LOWER
(/POLYMER-80-PF45-TEXTURED-FULL-SIZE-LOWER)

\$160.00



(/Polymore80-Textured-Full-Size-Lower)



POLYMER80 V2 TEXTURED
FULL SIZE LOWER
(/POLYMORE80-



(/Polymer80-Textured-Compact-Longslide-Lower)



POLYMER80 TEXTURED
COMPACT LONGSLIDE
LOWER (/POLYMER80-



(/Spectre-Polymer80-Compact-Textured)



POLYMER80 TEXTURED
COMPACT LOWER
(/SPECTRE-POLYMER80-



(/Spectre-Polymer80-Textured-Sub-Compact-Lower)



POLYMER80 TEXTURED
SUB-COMPACT LOWER

TEXTURED-FULL-SIZE-LOWER)
\$150.00



(/Signature-Series-Upper)



COMPLETE UPPER FOR GLOCKS (/SIGNATURE-SERIES-UPPER)
\$450.00

TEXTURED-COMPACT-LONGSLIDE-LOWER)
\$150.00



(/Glock-Factory-Large-Frame-Lower-Parts-Kit-20SF-21SF-Fits-Polymer-80)



GLOCK FACTORY LARGE FRAME LOWER PARTS KIT - 20SF/21SF - FITS POLYMER 80 (/GLOCK-FACTORY-LARGE-FRAME-LOWER-PARTS-KIT-20SF-21SF-FITS-POLYMER-80)

\$89.99

COMPACT-TEXTURED)
\$150.00



(/Glock-Factory-Large-Frame-Upper-Parts-Kit-20SF-21SF-Fits-PF45)



GLOCK FACTORY LARGE FRAME UPPER PARTS KIT - 20SF/21SF - FITS PF45 (/GLOCK-FACTORY-LARGE-FRAME-UPPER-PARTS-KIT-20SF-21SF-FITS-PF45)

\$119.99

(/SPECTRE-POLYMER80-TEXTURED-SUB-COMPACT-LOWER)
\$150.00



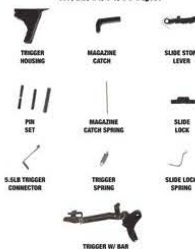
(/Spectre-Complete-Upper-Parts-Kit)



GLOCK FACTORY FULL SIZE UPPER PARTS KIT - 17/22/31 - FITS POLYMER 80 (/SPECTRE-COMPLETE-UPPER-PARTS-KIT)

\$119.99

For use with Polymer80 Full Size Lower - PF040 (17/22/31/34/35 Style)



(/Spectre-Complete-

For use with Compact Uppers (19/23/32 Style)



(/Compact-Spectre-

For use with Polymer80 Compact Lower - PF040C (19/23/32 Style)



(/Spectre-Compact-

FOR USE WITH SUB-COMPACT UPERS (26/27/33 STYLE)



(/Spectre-Complete-Sub-

Lower-Parts-Kit)

★★★★★

GLOCK FACTORY FULL SIZE LOWER PARTS KIT - 17/22/31 - FITS POLYMER 80 (/SPECTRE-COMPLETE-LOWER-PARTS-KIT)

\$89.99

Complete-Upper-Parts-Kit)

★★★★★

GLOCK FACTORY COMPACT UPPER PARTS KIT - 19/23/32 - FITS POLYMER80C] (/COMPACT-SPECTRE-COMPLETE-UPPER-PARTS-KIT)

\$119.99

Complete-Lower-Parts-Kit)

★★★★★

GLOCK FACTORY COMPACT LOWER PARTS KIT - 19/23/32 - FITS POLYMER80C (/SPECTRE-COMPACT-COMPLETE-LOWER-PARTS-KIT)

\$89.99

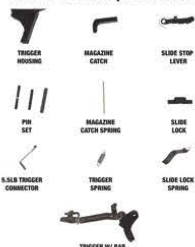
Compact-Upper-Parts-Kit)

★★★★★

GLOCK FACTORY SUB-COMPACT UPPER PARTS KIT - 26/27/33 - FITS POLYMER 80 (/SPECTRE-COMPLETE-SUB-COMPACT-UPPER-PARTS-KIT)

\$119.99

FOR USE WITH POLYMER80 SUB-COMPACT LOWER - PF940SC (26/27/33 STYLE)



(/Spectre-Sub-Compact-Complete-Lower-Parts-Kit)

★★★★★

GLOCK FACTORY SUB-COMPACT LOWER PARTS KIT - 26/27/33 - FITS POLYMER 80 (/SPECTRE-SUB-COMPACT-COMPLETE-LOWER-PARTS-KIT)

\$89.99



STANDARD

(/Polymer80-PS9-DLC-Stripped-Slide)

★★★★★

POLYMER80 PS9 DLC STRIPPED SLIDE (G17 COMPATIBLE) (/POLYMER80-PS9-DLC-STRIPPED-SLIDE)

\$375.00



(/Polymer80-PS9C-Slide)

★★★★★

POLYMER80 PS9C SLIDE (G19 COMPATIBLE) (/POLYMER80-PS9C-SLIDE)

\$375.00



(/Polymer80-PF-Series-Magwell)

★★★★★

POLYMER80 PF-SERIES MAGWELL (/POLYMER80-PF-SERIES-MAGWELL)

\$95.00



(/35-Dollar-Clip-Holster)



\$35 DOLLAR HOLSTER
(/35-DOLLAR-CLIP-HOLSTER)

\$35.00



(/40-Dollar-Holster)



\$40 DOLLAR HOLSTER
(/40-DOLLAR-HOLSTER)

\$40.00



(/30-Dollar-Holster)



\$30 DOLLAR HOLSTER
(/30-DOLLAR-HOLSTER)

\$30.00

SIGN UP FOR EXCLUSIVE SALES AND PRODUCT NEWS

username@domain.com **JOIN**

STORE LOCATOR (/RETAIL-SHOWROOM)

REQUEST A CATALOG (/REQUEST-CATALOG)

SHOP

Glock Guns (/handguns)
Performance Parts (/parts-accessories/performance-parts)

COMPANY

About Us (/about-us)
Lenny Magill (/lenny-magill)
Careers (/careers)

SUPPORT CENTER

Payment / Shipping / Returns (/shipping-and-returns)

MY ACCOUNT

LogIn To Your Account (/login-register)
Create An Account (/login-register)

CONTACT INFO

GlockStore.com
4770 Ruffner St.
San Diego, CA

| | | | | |
|--|--|---|---|--|
| Magazines (/magazines) | Testimonials (/testimonials) | Free Shipping Policy (/free-shipping-policy) | Track your Order (/purchases) | 92111 |
| Accessories (/parts-accessories) | Store Locator (/retail-showroom) | Privacy Policy (/privacy-policy) | Wish List (/wishlist) | TEL: 800-601-8273 FAX: 858-569-0505 |
| Holsters (/holsters) | Videos (http://community.glockstore.com/video) | Contact Us (/contact-us) | | Customer Service |
| Concealment (/concealment) | Blog (http://community.glockstore.com) | Request Catalog (/request-catalog) | | Telephone Hours Monday thru Friday 7am to 7pm PST |
| Custom Gun Services (/customize) | | UnderTech UnderCover Size Chart (/sizing-chart) | | Saturday and Sunday 8am to 4:30pm PST |
| Glock Factory Parts (/parts-accessories/glock-factory-parts) | | FFL Information (/ffl-info) | | |
| Bulk Ammo Transfer (/Bulk-Ammo-Transfer) | | | | |
| Top Shot Tuesday (/tst-ff-sign-up) | | | | |

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WE ACCEPT

(<https://www.facebook.com/glockstore>)
(<https://www.instagram.com/glockstore>)
(<https://www.youtube.com/channel/UCp0u0erest.com>)
(<https://www.pinterest.com/glockstore>)

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EXHIBIT B

1 XAVIER BECERRA
Attorney General of California
2 NICKLAS A. AKERS (SBN 211222)
Senior Assistant Attorney General
3 MICHAEL E. ELISOFFON (SBN 240707)
Supervising Deputy Attorney General
4 VESNA CUK (SBN 309157)
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 510-3782
6 Fax: (415) 703-5480
E-mail: vesna.cuk@doj.ca.gov
7

8
9
10 BEFORE THE DEPARTMENT OF JUSTICE
11 OFFICE OF THE ATTORNEY GENERAL
12 STATE OF CALIFORNIA

13
14 In the Matter of the Investigation of:
15 **FIREARMS AND OTHER WEAPONS**

INVESTIGATIVE INTERROGATORIES

GOV. CODE § 11180, ET SEQ.

16
17
18
19
20
21
22 NOTICE TO THE PERSON SERVED:

23 You are served on behalf of:

LMP/MAIL ORDER VIDEO, INC.

(d/b/a GLOCKSTORE)

1
2 Pursuant to the powers conferred by Article 2 of Chapter 2 of Division 3 of Title 2 (Cal.
3 Gov. Code, § 11180 et seq.) of the Government Code of California, on the Attorney General, as
4 head of the California Department of Justice, which powers and authority to conduct the above
5 entitled investigation have been delegated to the undersigned, an officer of that Department,
6

7 **LMP/MAIL ORDER VIDEO, INC. (d/b/a GLOCKSTORE)**

8
9 (hereinafter "WITNESS") **IS HEREBY COMMANDED** to answer separately and fully in
10 writing, under oath, within thirty days of service hereof, each of the interrogatories set forth
11 below.

12 **INSTRUCTIONS FOR COMPLIANCE**

- 13 1. The Relevant Time Period of these investigative interrogatories is July 1, 2010 through the
14 final response date unless otherwise expressly stated herein.
- 15 2. An answer or other appropriate response must be given to each interrogatory set forth
16 below.
- 17 3. Each answer must be as complete and straightforward as the information reasonably
18 available to WITNESS, including the information possessed by WITNESS'S attorneys or agents,
19 permits. If an interrogatory cannot be answered completely, answer it to the extent possible,
20 specifying the reasons for WITNESS'S inability to answer the remainder of the interrogatory and
21 stating whatever information, knowledge, or belief that WITNESS has concerning the
22 unanswered portion thereof.
- 23 4. If WITNESS is asserting a privilege or making an objection to an interrogatory, WITNESS
24 must specifically assert the privilege or state the objection in WITNESS'S written response, and
25 set forth in detail the basis for WITNESS'S objection or assertion of the privilege. If an objection
26 pertains to only a portion of an interrogatory, or a word, phrase, or clause contained in it,
27 WITNESS must respond to the remainder of the interrogatory.
28

1 5. WITNESS'S answers to these interrogatories must be verified, dated, and signed.

2 WITNESS may wish to use the following form at the end of its answers:

3 *I declare under penalty of perjury under the laws of the State of California that the*
4 *foregoing answers are true and correct.*

5 _____
(DATE)

_____ (SIGNATURE)

6 6. These Investigative Interrogatories have been issued in connection with an investigation
7 within the scope of section 131 of the California Penal Code.

8 7. WITNESS'S written responses shall be delivered to the California Department of Justice,
9 Office of the Attorney General, 1300 I Street, Sacramento, CA 95814, ATTN: Deputy Attorney
10 General Vesna Cuk.

11 DEFINITIONS

12 A. "80% LOWER" means a firearm receiver blank, "casting," "machined body," or unfinished
13 handgun frame, in which the fire-control cavity area is completely solid and un-machined and has
14 not reached the "stage of manufacture," as defined by the U.S. Bureau of Alcohol, Tobacco,
15 Firearms, and Explosives (ATF), and includes, but is not limited to, items commonly referred to
16 as "80% lower," "80% lower receiver," "unfinished receiver," and "80% receiver." This term
17 includes, but is not limited to, the SS80 80% Lower, any "Polymer80" 80% Lower, and the "P80
18 frame" that is part of the "Syndicate Kit," sold by YOU as shown in Exhibit 1 attached hereto.

19 B. "80% BUILD KIT" means any combination of component parts or tools that can be used to
20 MANUFACTURE a handgun made with an 80% LOWER, with or without additional component
21 parts or tools. This term includes, but is not limited to, all the items sold by YOU under the
22 heading 80% BUILD KITS, as shown in Exhibit 1 attached hereto, such as the following types of
23 products:

- 24 a. 80% LOWER,
- 25 b. "Upper Parts Kit,"
- 26 c. "Lower Parts Kit,"
- 27 d. "Polymer80 Buy Build Shoot Kit,"
- 28 e. "Slides,"

- 1 f. "Pyramid Trigger,"
- 2 g. "Builder Tool Set,"
- 3 h. "Syndicate Kit," and
- 4 i. "Upper."

5 C. "ADVERTISING" and "ADVERTISEMENT" mean any information disseminated or
6 circulated by YOU for the purposes of promoting, marketing, selling, or providing information or
7 instruction RELATING TO any products sold by YOU or YOUR stores. The terms include,
8 without limitation, web pages, videos, commercials, blog posts, social media posts, handouts,
9 brochures, catalogues, or any other marketing materials or ADVERTISEMENTS via Internet,
10 print, mail, radio, or television.

11 D. "COMMUNICATION" and "COMMUNICATIONS" mean every disclosure, transfer,
12 exchange or transmission of information, whether oral, written, or electronic, and whether face-
13 to-face, by telecommunications, telephone, computer, mail, email, text message, instant message,
14 telecopier, facsimile (fax) machine, or otherwise, including attachment(s).

15 "COMMUNICATION" and "COMMUNICATIONS" mean all "writings" as defined in
16 California Evidence Code section 250.

17 E. "DESCRIBE" means to provide a complete description and explanation of the facts,
18 circumstances, analysis, and other information RELATING TO the subject matter of a specific
19 interrogatory.

20 F. "DOCUMENT" means, without limitation, any "writing," as defined in Evidence Code
21 section 250 and includes originals (as defined in Evidence Code section 255) or duplicates (as
22 defined in Evidence Code section 260) of or copies of the writings, and non-identical copies
23 bearing or having any attachments, notes or marks which distinguish them from the originals, and
24 any electronic records, including, without limitation, electronic mail, spreadsheets, word
25 processing files, and records saved as .pdf or other electronic files. Electronic mail subject to this
26 Subpoena includes messages and attachments now only available on backup or archive tapes or
27 disks. If a print-out of an electronic record is a non-identical copy of the electronic version (for
28 example), because the print-out has a signature, handwritten notation, or other mark or attachment

1 not included in the computer DOCUMENT), both the electronic version in which the
2 DOCUMENT was created and the original print-out must be produced.

3 G. “IDENTIFY” or “IDENTITY” means to state:

- 4 a. in the case of a location, the physical and mailing addresses (including zip code) and
5 telephone number;
- 6 b. in the case of a natural PERSON, his or her name, business address and telephone
7 number, employer, and title or position; and
- 8 c. in the case of a PERSON other than a natural PERSON, its name, the address of its
9 principal place of business (including zip code), its telephone number, and the name of
10 its chief executive officer, the name of any PERSON that ultimately controls it, along
11 with the address (including zip code) of that PERSON’S principal place of business
12 (including zip code), telephone number, and if applicable, the name of that
13 PERSON’S chief executive officer.

14 H. “INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION” means
15 any information disseminated or provided by YOU for the purposes of informing, educating, or
16 instructing consumers on a topic. The term includes, without limitation, web pages, videos,
17 commercials, blog posts, social media posts, handouts, brochures, catalogues, or any other
18 INSTRUCTIONAL OR EDUCATIONAL MATERIALS provided via Internet, print, mail, radio,
19 or television.

20 I. “INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION
21 RELATING TO the MANUFACTURE of a handgun” includes without limitation
22 INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION RELATED TO
23 the lawfulness of MANUFACTURING a handgun and instructions on how to MANUFACTURE
24 a handgun.

25 J. “MANUFACTURE” and “MANUFACTURING” mean to manufacture, assemble,
26 fabricate, construct, or build. The terms include MANUFACTURE by an individual who is not a
27 Federal Firearms Licensee (FFL), sometimes referred to as “self-manufacture.”
28

1 K. "PERSON" or "PERSONS" mean any natural person, corporation, company, partnership,
2 joint venture, firm, licensee, affiliate, subsidiary, association, proprietorship, agency, board,
3 authority, commission, office or other business or legal entity, whether private or governmental.

4 L. "RELATING TO," "RELATED TO," and "IN RELATION TO" means constituting,
5 containing, concerning, discussing, describing, analyzing, identifying, referring to, relating to,
6 referencing, documenting, governing, regulating, directing, evidencing or stating.

7 M. "YOU," "YOUR," and "GLOCKSTORE" mean LMP Mail Order Video, Inc., GlockStore,
8 The Glock Store, Glockstore.com, Digital Retail Display, Gun Video, Lenny Magill Productions,
9 Magill's Glockstore Performance & Custom, Nevada Distribution Center, San Diego Sewing
10 Company, Time Zone Internet, Time Zone Multimedia, Time Zone Video,
11 Undertechundercover.com, Website Advertising Network, Youreeka Two, as well as each of their
12 subsidiaries, affiliates and parents, predecessors and successors, and all employees, partners,
13 officers, agents, and representatives of each of them.

14 N. "and" and "or" have both conjunctive and disjunctive meanings.

15 INTERROGATORIES

16 INTERROGATORY NO. 1

17 State YOUR correct legal name and address and all other trade or business names under which
18 YOU do or have done business RELATING TO GLOCKSTORE.

19 INTERROGATORY NO. 2

20 For any component parts or tools or combination thereof that can be used to MANUFACTURE a
21 handgun that YOU sold, offered or exposed for sale, or ADVERTISED in California, including,
22 but not limited to, the items sold on YOUR website under the heading 80% BUILD KITS, state
23 the name of the item and the Stock Keeping Unit (SKU) and Universal Product Code (UPC).

24 INTERROGATORY NO. 3

25 For any component parts or tools or combination thereof that can be used to MANUFACTURE a
26 handgun that YOU sold to a California consumer, including, but not limited to, the items sold on
27 YOUR website under the heading 80% BUILD KITS, state the following:

- 28 a. The SKU or UPC of the item,

- 1 b. The purchase price,
- 2 c. The date of sale,
- 3 d. The IDENTITY of the purchaser,
- 4 e. The method of sale (e.g., over the Internet, by phone, or in-store),
- 5 f. The method of delivery (e.g., shipped for delivery, picked up in-store, or direct in-
- 6 store purchase),
- 7 g. The IDENTITY of (i) the location where the item was warehoused and (ii) the
- 8 location it was shipped from, and
- 9 h. The delivery address, in-store pickup location, or in-store address for direct purchases,
- 10 as applicable.

11 INTERROGATORY NO. 4

12 For all 80% LOWERS identified in response to Interrogatory No. 2, above, state the following:

- 13 a. The SKU or UPC of the unit,
- 14 b. The make, model, brand, and/or manufacturer,
- 15 c. The IDENTITY of the manufacturer, and
- 16 d. Whether the unit is manufactured or assembled from polymer plastic, and if so,
- 17 whether it contains stainless steel material and how much.

18 INTERROGATORY NO. 5

19 For each of YOUR webpages offering for sale any component parts or tools or combination
20 thereof that can be used to MANUFACTURE a handgun, including, but not limited to, the items
21 sold on YOUR website under the heading 80% BUILD KITS, state the following:

- 22 a. The Uniform Resource Locator (URL) of the webpage,
- 23 b. The dates on which the webpage was available on the Internet,
- 24 c. The number of views by consumers nationwide, and
- 25 d. The number of views by California consumers.

26 INTERROGATORY NO. 6

27 For each Internet ADVERTISEMENT RELATING TO any component parts or tools or
28 combination thereof that can be used to MANUFACTURE a handgun, targeted at, viewable by,

1 or provided to California consumers, including, but not limited to, ADVERTISEMENTS for the
2 items sold on YOUR website under the heading 80% BUILD KITS, state the following:

- 3 a. The URL of the associated website,
- 4 b. The dates on which the ADVERTISEMENT was available on the Internet,
- 5 c. The number of views by consumers nationwide, and
- 6 d. The number of views by California consumers.

7 INTERROGATORY NO. 7

8 For each Internet ADVERTISEMENT RELATING TO the MANUFACTURE of a handgun
9 targeted at, viewable by, or provided to California consumers, state the following:

- 10 a. The URL of the associated website,
- 11 b. The dates on which the ADVERTISEMENT was available on the Internet,
- 12 c. The number of views by consumers nationwide, and
- 13 d. The number of views by California consumers.

14 INTERROGATORY NO. 8

15 For any INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION
16 RELATING TO the MANUFACTURE of a handgun targeted at, viewable by, or provided to
17 California consumers via the Internet, state the following:

- 18 a. The URL of the website,
- 19 b. The dates the materials or information were available on the Internet,
- 20 c. The number of views by consumers nationwide, and
- 21 d. The number of views by California consumers.

22 INTERROGATORY NO. 9

23 For each print ADVERTISEMENT for any component parts or tools or combination thereof that
24 can be used to MANUFACTURE a handgun, targeted at, viewable by, or provided to California
25 consumers, including, but not limited to, ADVERTISEMENTS for the items sold on YOUR
26 website under the heading 80% BUILD KITS, state the following, as applicable:

- 27 a. The IDENTITY of the publication and publisher,
- 28 b. The dates the ADVERTISEMENT was in circulation,

- 1 c. The locations of circulation by zip code,
2 d. The number of copies circulated by zip code,
3 e. The IDENTITY of YOUR stores providing the ADVERTISEMENT directly to
4 consumers,
5 f. The number of copies distributed directly to consumers by each of YOUR stores, and
6 g. The total number of copies circulated in California.

7 INTERROGATORY NO. 10

8 For each print ADVERTISEMENT RELATING TO the MANUFACTURE of a handgun
9 targeted at, viewable by, or provided to California consumers, state the following, as applicable:

- 10 a. The IDENTITY of the publication and publisher,
11 b. The dates the ADVERTISEMENT was in circulation,
12 c. The locations of circulation by zip code,
13 d. The number of copies circulated by zip code,
14 e. The IDENTITY of YOUR stores providing the ADVERTISEMENT directly to
15 consumers,
16 f. The number of copies distributed directly to consumers by each of YOUR stores, and
17 g. The total number of copies circulated in California.

18 INTERROGATORY NO. 11

19 For any INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION
20 RELATING TO the MANUFACTURE of a handgun targeted at, viewable by, or provided to
21 California consumers in print, state the following:

- 22 a. The IDENTITY of the publication and publisher,
23 b. The dates of circulation,
24 c. The locations of circulation by zip code,
25 d. The number of copies circulated by zip code,
26 e. The IDENTITY of YOUR stores providing the materials or information directly to
27 consumers,
28 f. The number of copies distributed directly to consumers by each of YOUR stores, and

1 g. The total number of copies circulated in California.

2 INTERROGATORY NO. 12

3 For each radio or television ADVERTISEMENT for any component parts or tools or combination
4 thereof that can be used to MANUFACTURE a handgun, targeted at, viewable by, or provided to
5 California consumers, including, but not limited to, ADVERTISEMENTS for the items sold on
6 YOUR website under the heading 80% BUILD KITS, state the following:

- 7 a. The IDENTITY of the station on which the ADVERTISEMENT was run,
- 8 b. The dates and times the ADVERTISEMENT was run,
- 9 c. The number of times the ADVERTISEMENT was run nationwide,
- 10 d. The number of times the ADVERTISEMENT was run in California, and
- 11 e. The estimated, anticipated, desired, or known number of viewers or listeners for the
12 ADVERTISEMENT nationwide, as applicable, and
- 13 f. The estimated, anticipated, desired, or known number of viewers or listeners for the
14 ADVERTISEMENT in California, as applicable.

15 INTERROGATORY NO. 13

16 For each radio or television ADVERTISEMENT RELATING TO the MANUFACTURE of a
17 handgun targeted at, viewable by, or provided to California consumers, state the following:

- 18 a. The IDENTITY of the station on which the ADVERTISEMENT was run,
- 19 b. The dates and times the ADVERTISEMENT was run,
- 20 c. The number of times the ADVERTISEMENT was run nationwide,
- 21 d. The number of times the ADVERTISEMENT was run in California, and
- 22 e. The estimated, anticipated, desired, or known number of viewers or listeners for the
23 ADVERTISEMENT nationwide, as applicable, and
- 24 f. The estimated, anticipated, desired, or known number of viewers or listeners for the
25 ADVERTISEMENT in California, as applicable.

26 INTERROGATORY NO. 14

27 For any INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION
28

1 RELATING TO the MANUFACTURE of a handgun targeted at, viewable by, or provided to
2 California consumers via radio or television, state the following:

- 3 a. The IDENTITY of the station on which it was provided,
- 4 b. The dates and times it was provided,
- 5 c. The number of times it was provided nationwide,
- 6 d. The number of times it was provided in California, and
- 7 e. The estimated, anticipated, desired, or known number of viewers or listeners
8 nationwide, as applicable, and
- 9 f. The estimated, anticipated, desired, or known number of viewers or listeners in
10 California, as applicable.

11 INTERROGATORY NO. 15

12 DESCRIBE YOUR policies and procedures regarding the sale, offering or exposing for sale, or
13 ADVERTISING in California of any component parts or tools or combination thereof that can be
14 used to MANUFACTURE a handgun, including, but not limited to, with respect to the items sold
15 on YOUR website under the heading 80% BUILD KITS.

16 INTERROGATORY NO. 16

17 DESCRIBE any training provided to employees regarding the sale, offering or exposing for sale,
18 or ADVERTISING in California of any component parts or tools or combination thereof that can
19 be used to MANUFACTURE a handgun, including, but not limited to, with respect to the items
20 sold on YOUR website under the heading 80% BUILD KITS.

21 INTERROGATORY NO. 17

22 DESCRIBE YOUR policies and procedures regarding ADVERTISING in California RELATING
23 TO the MANUFACTURE of a handgun.

24 INTERROGATORY NO. 18

25 DESCRIBE any training provided to employees regarding ADVERTISING in California
26 RELATING TO the MANUFACTURE of a handgun.

27 INTERROGATORY NO. 19

28 DESCRIBE YOUR policies and procedures regarding providing INSTRUCTIONAL OR

1 EDUCATIONAL MATERIALS OR INFORMATION RELATING TO the MANUFACTURE of
2 a handgun in California.

3 INTERROGATORY NO. 20

4 DESCRIBE any training provided to employees regarding providing INSTRUCTIONAL OR
5 EDUCATIONAL MATERIALS OR INFORMATION RELATING TO the MANUFACTURE of
6 a handgun in California.

7 INTERROGATORY NO. 21

8 DESCRIBE YOUR policies and procedures regarding the manufacture or causing to
9 manufacture, import for sale, keeping for sale, offering or exposing for sale, selling, or
10 ADVERTISING of products that are defective, damaged, unsafe, unlawful, or not as they appear
11 or as described in YOUR ADVERTISING or on YOUR website.

12 INTERROGATORY NO. 22

13 DESCRIBE YOUR policies and procedures regarding COMPLAINTS made by (a) California
14 consumers and (b) consumers nationwide regarding the sale, offering or exposing for sale, or
15 ADVERTISING of products alleged to be defective, damaged, unsafe, unlawful, or not as they
16 appear or as described in YOUR ADVERTISING or on YOUR website.

17 INTERROGATORY NO. 23

18 DESCRIBE any training provided to employees regarding COMPLAINTS made by (a) California
19 consumers and (b) consumers nationwide regarding the sale, offering or exposing for sale, or
20 ADVERTISING of products alleged to be defective, damaged, unsafe, unlawful, or not as they
21 appear or as described in YOUR ADVERTISING or on YOUR website.

22 INTERROGATORY NO. 24

23 DESCRIBE YOUR policies and procedures regarding orders for YOUR products made by (a)
24 California consumers and (b) consumers nationwide, including without limitation regarding order
25 processing and fulfillment, payment, shipping, returns, refunds, and out of stock or backordered
26 items (including failure to provide notification thereof).

27 INTERROGATORY NO. 25

28 DESCRIBE any training provided to employees regarding orders for YOUR products made by (a)

1 California consumers and (b) consumers nationwide, including without limitation regarding order
2 processing and fulfillment, payment, shipping, returns, refunds, and out of stock or backordered
3 items (including failure to provide notification thereof).

4 INTERROGATORY NO. 26

5 DESCRIBE YOUR policies and procedures regarding COMPLAINTS IN RELATION TO orders
6 for YOUR products made by (a) California consumers and (b) consumers nationwide, including
7 without limitation regarding order processing and fulfillment, payment, shipping, returns, refunds,
8 and out of stock or backordered items (including failure to provide notification thereof).

9 INTERROGATORY NO. 27

10 DESCRIBE any training provided to employees regarding COMPLAINTS IN RELATION TO
11 orders for YOUR products made by (a) California consumers and (b) consumers nationwide,
12 including without limitation regarding order processing and fulfillment, payment, shipping,
13 returns, refunds, and out of stock or backordered items (including failure to provide notification
14 thereof).

15 INTERROGATORY NO. 28

16 DESCRIBE YOUR policies and procedures RELATING TO age verification of California
17 consumers who attempt to purchase or purchase from YOU any component parts or tools or
18 combination thereof that can be used to MANUFACTURE a handgun, including, but not limited
19 to, the items sold on YOUR website under the heading 80% BUILD KITS.

20 INTERROGATORY NO. 29

21 Identify all third parties and third party products that YOU use in connection with conducting age
22 verification of California consumers attempting to purchase or purchasing YOUR products.

23
24
25 FAILURE TO COMPLY WITH THIS SUBPOENA WILL SUBJECT YOU TO THE
26 PROCEEDINGS AND PENALTIES PROVIDED BY LAW.

1 Dated: October 21, 2019

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VESNA CUK
Deputy Attorney General

EXHIBIT 1

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80% BUILD KITS

GRID VIEW

([/PARTS-ACCESSORIES/POLYMER80](#)) **LIST VIEW**

([/PARTS-ACCESSORIES/POLYMER80?DISPLAY=LIST](#))

Sort by relevance

PYRAMID TRIGGER (/PARTS-ACCESSORIES/PYRAMID-TRIGGERS)

FLAT FACE PYRAMID TRIGGER (/PARTS-ACCESSORIES/FLAT-FACE)

80% BUILD KITS (/PARTS-ACCESSORIES/POLYMER80)

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EXTENDED CONTROLS (/PARTS-ACCESSORIES/EXTENDED-CONTROLS)

SEE MORE



(/SS80-M-Model)

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SS80 80% LOWER (/SS80-M-MODEL)

\$129.99



(/Glock-Factory-Complete-Upper-Parts-Kit-for-Glock-43)

★★★★★

G43 COMPLETE UPPER PARTS KIT (/GLOCK-FACTORY-COMPLETE-UPPER-PARTS-KIT-FOR-GLOCK-43)

\$119.99



(/G43-Complete-Lower-Parts-Kit)

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G43 COMPLETE LOWER PARTS KIT (/G43-COMPLETE-LOWER-PARTS-KIT)

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POLYMER80 BUY BUILD SHOOT KIT (/POLYMER80-BUY-BUILD-SHOOT-KIT)

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STAINLESS STEEL PYRAMID CUT

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★★★★★

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COMPLETE PYRAMID TRIGGER (/COMPLETE-PYRAMID-TRIGGER)

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ULTIMATE PYRAMID TRIGGER (/ULTIMATE-PYRAMID-TRIGGER)

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(/SS80-Build-Set)

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SS80 BUILDER TOOL SET (/SS80-BUILD-SET)

\$20.00

PRICE

\$20.00



\$1,200.00



SHOWN WITH S2 OPTION
(/Syndicate-Compact-Kit)



SYNDICATE KIT
(/SYNDICATE-COMPACT-KIT)

\$1,200.00



(/80-P320-Compatible-Insert-MUP-1)



80% P320 COMPATIBLE
INSERT - MUP-1 (/80-P320-COMPATIBLE-INSERT-MUP-1)

\$100.00



(/Jig-for-80-P320-Compatible-Insert-MUP-1)



JIG FOR 80% P320
COMPATIBLE INSERT -
MUP-1 (/JIG-FOR-80-P320-COMPATIBLE-INSERT-MUP-1)

\$150.00



(/Polymer-80-PF45-Textured-Full-Size-Lower)



POLYMER 80 PF45 LARGE
FRAME LOWER
(/POLYMER-80-PF45-TEXTURED-FULL-SIZE-LOWER)

\$160.00



(/Polymore80-Textured-Full-Size-Lower)



POLYMER80 V2 TEXTURED
FULL SIZE LOWER
(/POLYMORE80-



(/Polymer80-Textured-Compact-Longslide-Lower)



POLYMER80 TEXTURED
COMPACT LONGSLIDE
LOWER (/POLYMER80-



(/Spectre-Polymer80-Compact-Textured)



POLYMER80 TEXTURED
COMPACT LOWER
(/SPECTRE-POLYMER80-



(/Spectre-Polymer80-Textured-Sub-Compact-Lower)



POLYMER80 TEXTURED
SUB-COMPACT LOWER

TEXTURED-FULL-SIZE-LOWER)
\$150.00

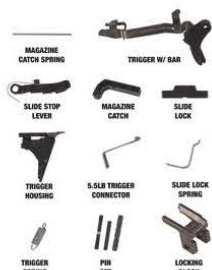


(/Signature-Series-Upper)



COMPLETE UPPER FOR GLOCKS (/SIGNATURE-SERIES-UPPER)
\$450.00

TEXTURED-COMPACT-LONGSLIDE-LOWER)
\$150.00



(/Glock-Factory-Large-Frame-Lower-Parts-Kit-20SF-21SF-Fits-Polymer-80)



GLOCK FACTORY LARGE FRAME LOWER PARTS KIT - 20SF/21SF - FITS POLYMER 80 (/GLOCK-FACTORY-LARGE-FRAME-LOWER-PARTS-KIT-20SF-21SF-FITS-POLYMER-80)

\$89.99

COMPACT-TEXTURED)
\$150.00



(/Glock-Factory-Large-Frame-Upper-Parts-Kit-20SF-21SF-Fits-PF45)



GLOCK FACTORY LARGE FRAME UPPER PARTS KIT - 20SF/21SF - FITS PF45 (/GLOCK-FACTORY-LARGE-FRAME-UPPER-PARTS-KIT-20SF-21SF-FITS-PF45)

\$119.99

(/SPECTRE-POLYMER80-TEXTURED-SUB-COMPACT-LOWER)
\$150.00



(/Spectre-Complete-Upper-Parts-Kit)



GLOCK FACTORY FULL SIZE UPPER PARTS KIT - 17/22/31 - FITS POLYMER 80 (/SPECTRE-COMPLETE-UPPER-PARTS-KIT)

\$119.99

For use with Polymer80 Full Size Lower - PF940 (17/22/31/34/35 Style)



(/Spectre-Complete-

For use with Compact Uppers (19/23/32 Style)



(/Compact-Spectre-

For use with Polymer80 Compact Lower - PF940C (19/23/32 Style)



(/Spectre-Compact-

FOR USE WITH SUB-COMPACT UPERS (26/27/33 STYLE)



(/Spectre-Complete-Sub-

Lower-Parts-Kit)

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GLOCK FACTORY FULL SIZE LOWER PARTS KIT - 17/22/31 - FITS POLYMER 80 (/SPECTRE-COMPLETE-LOWER-PARTS-KIT)

\$89.99

Complete-Upper-Parts-Kit)

★★★★★

GLOCK FACTORY COMPACT UPPER PARTS KIT - 19/23/32 - FITS POLYMER80C] (/COMPACT-SPECTRE-COMPLETE-UPPER-PARTS-KIT)

\$119.99

Complete-Lower-Parts-Kit)

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GLOCK FACTORY COMPACT LOWER PARTS KIT - 19/23/32 - FITS POLYMER80C (/SPECTRE-COMPACT-COMPLETE-LOWER-PARTS-KIT)

\$89.99

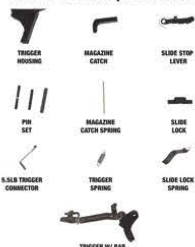
Compact-Upper-Parts-Kit)

★★★★★

GLOCK FACTORY SUB-COMPACT UPPER PARTS KIT - 26/27/33 - FITS POLYMER 80 (/SPECTRE-COMPLETE-SUB-COMPACT-UPPER-PARTS-KIT)

\$119.99

FOR USE WITH POLYMER80 SUB-COMPACT LOWER - PF940SC (26/27/33 STYLE)



(/Spectre-Sub-Compact-Complete-Lower-Parts-Kit)

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GLOCK FACTORY SUB-COMPACT LOWER PARTS KIT - 26/27/33 - FITS POLYMER 80 (/SPECTRE-SUB-COMPACT-COMPLETE-LOWER-PARTS-KIT)

\$89.99



STANDARD

(/Polymer80-PS9-DLC-Stripped-Slide)

★★★★★

POLYMER80 PS9 DLC STRIPPED SLIDE (G17 COMPATIBLE) (/POLYMER80-PS9-DLC-STRIPPED-SLIDE)

\$375.00



(/Polymer80-PS9C-Slide)

★★★★★

POLYMER80 PS9C SLIDE (G19 COMPATIBLE) (/POLYMER80-PS9C-SLIDE)

\$375.00



(/Polymer80-PF-Series-Magwell)

★★★★★

POLYMER80 PF-SERIES MAGWELL (/POLYMER80-PF-SERIES-MAGWELL)

\$95.00



(/35-Dollar-Clip-Holster)



\$35 DOLLAR HOLSTER
(/35-DOLLAR-CLIP-HOLSTER)

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(/40-DOLLAR-HOLSTER)

\$40.00



(/30-Dollar-Holster)



\$30 DOLLAR HOLSTER
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Payment / Shipping / Returns (/shipping-and-returns)

MY ACCOUNT

LogIn To Your Account (/login-register)
Create An Account (/login-register)

CONTACT INFO

GlockStore.com
4770 Ruffner St.
San Diego, CA

| | | | | |
|--|--|---|---|--|
| Magazines (/magazines) | Testimonials (/testimonials) | Free Shipping Policy (/free-shipping-policy) | Track your Order (/purchases) | 92111 |
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| Concealment (/concealment) | Blog (http://community.glockstore.com) | Request Catalog (/request-catalog) | | Telephone Hours Monday thru Friday 7am to 7pm PST |
| Custom Gun Services (/customize) | | UnderTech UnderCover Size Chart (/sizing-chart) | | Saturday and Sunday 8am to 4:30pm PST |
| Glock Factory Parts (/parts-accessories/glock-factory-parts) | | FFL Information (/ffl-info) | | |
| Bulk Ammo Transfer (/Bulk-Ammo-Transfer) | | | | |
| Top Shot Tuesday (/tst-ff-sign-up) | | | | |

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EXHIBIT C

| | | | | |
|---|---------------|-------|------------|--------------|
| CALIFORNIA DEPARTMENT OF JUSTICE (415) 510-3782 OFFICE OF THE ATTORNEY GENERAL Nickals A. Akers, Senior Assistant Attorney General (SBN 211222) Michael E. Elisofon, Supervising Deputy Attorney General (SBN 240707) Vesna Cuk, Deputy Attorney General (SBN 309157) 455 Golden Gate Avenue, Suite 11000 San Francisco, California 94102-7004 ATTORNEY FOR (Name): PEOPLE OF THE STATE OF CALIFORNIA | | | | |
| BEFORE THE DEPARTMENT OF JUSTICE OFFICE OF THE ATTORNEY GENERAL STATE OF CALIFORNIA | | | | |
| In the Matter of the Investigation of: FIREARMS AND OTHER WEAPONS | | | | |
| PROOF OF SERVICE | HEARING DATE: | TIME: | DEPT/DIV.: | CASE NUMBER: |

1. At the time of service I was at least 18 years of age and not a party to this action, and I served copies of the (*specify document(s)*): **INVESTIGATIVE SUBPOENA GOV. CODE § 11180, ET SEQ.; INVESTIGATIVE INTERROGATORIES GOV. CODE § 11180, ET SEQ.; LETTER ADDRESSED TO LMP/MAIL ORDER VIDEO, INC., (d/b/a Glockstore) c/o Leonard L. Magill**

2. a. Party served: **LMP/MAIL ORDER VIDEO, INC. (d/b/a GLOCKSTORE)**
- b. Person served: **Kyle Parker, Supervisor, authorized person to accept service of process (Caucasian male, 50 yrs., 5'2", 150 lbs., Blue eyes, Blonde hair)**
- c. Address: **4770 Ruffner Street
San Diego, California 92111**

3. I served the party in item 2
 a. by personally delivering the copies (1) on (date): **10/22/2019**
 (2) at (time): **02:04 p.m**

4. Person serving (*name, address, and telephone No.*):

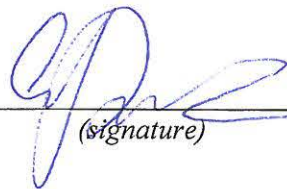
Candy Rodriguez
Ace Attorney Service, Inc.
 444 West C Street, Suite 410
 San Diego, California 92101
 (619) 235-8400

Fee for service: \$

Registered California process server.
 (1) Employee or independent contractor.
 (2) Registration No.: **3187**
 (3) County: **SAN DIEGO**

5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: **October 28, 2019**



 (*signature*)

#1782479R

PROOF OF SERVICE

EXHIBIT D

1 XAVIER BECERRA
Attorney General of California
2 NICKLAS A. AKERS (SBN 211222)
Senior Assistant Attorney General
3 MICHAEL E. ELISOFFON (SBN 240707)
Supervising Deputy Attorney General
4 VESNA CUK (SBN 309157)
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 510-3782
6 Fax: (415) 703-5480
E-mail: vesna.cuk@doj.ca.gov
7

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9
10 BEFORE THE DEPARTMENT OF JUSTICE
11 OFFICE OF THE ATTORNEY GENERAL
12 STATE OF CALIFORNIA

13
14 In the Matter of the Investigation of:
15 **FIREARMS AND OTHER WEAPONS**

INVESTIGATIVE SUBPOENA
GOV. CODE § 11180, ET SEQ.

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22 NOTICE TO THE PERSON SERVED:

23 You are served on behalf of: **GS PERFORMANCE, LLC**
24 **(d/b/a GLOCKSTORE)**
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1 Pursuant to the powers conferred by Article 2 of Chapter 2 of Division 3 of Title 2 (Cal.
2 Gov. Code, § 11180 et seq.) of the Government Code of California, on the Attorney General, as
3 head of the California Department of Justice, which powers and authority to conduct the above
4 entitled investigation have been delegated to the undersigned, an officer of that Department,

5
6 **GS PERFORMANCE, LLC (d/b/a GLOCKSTORE)**

7
8 (hereinafter “WITNESS”) **IS HEREBY COMMANDED** to produce the documents, books,
9 records, papers and other items (collectively “Items”) described in Attachment A to this
10 Investigative Subpoena which are in WITNESS’S custody, possession or control, or the custody,
11 possession or control of WITNESS’S subsidiaries, affiliates, parents, predecessors, successors,
12 employees, partners, officers, agents or representatives, whether or not the present location of any
13 of the Items designated is in California, at the California Department of Justice, Office of the
14 Attorney General, 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102, ATTN:
15 Deputy Attorney General Vesna Cuk, within fifteen days of service hereof.

16 **INSTRUCTIONS FOR COMPLIANCE**

- 17 1. The Items shall be accompanied by a completed declaration of custodian of records in
18 compliance with Evidence Code sections 1560, 1561, 1562, and 1271.
- 19 2. The Relevant Time Period of this subpoena is July 1, 2010 through the final response date
20 of this subpoena unless otherwise expressly stated herein. All responsive Items created,
21 maintained or altered during the Relevant Time Period must be produced unless otherwise
22 expressly stated in Attachment A to this subpoena.
- 23 3. If WITNESS claims that an Item or a portion of an Item is privileged and WITNESS
24 withholds it from production for that reason, WITNESS must create and submit a privilege log
25 which lists: (1) the author(s) and their capacities; (2) the recipients (including cc’s and bcc’s) and
26 their capacities; (3) other individuals with access to the document and their capacities; (4) the
27 type of document; (5) the subject matter of the document; (6) the purpose(s) for the production of
28 the document; (7) the date on the document; and (8) a detailed explanation setting forth the

1 factual and legal basis for your claim that the document is privileged or otherwise immune from
2 production.

3 4. To the extent responsive Items exist in an electronic or computerized format, please contact
4 the officer issuing this subpoena to discuss the manner and format in which the Items are to be
5 produced so as to facilitate the production of full and complete copies in a usable format. In the
6 absence of an agreement regarding the manner and format of production, the following
7 instructions shall apply:

8 a. The information shall be provided on CD/DVD or external hard drive formatted as
9 follows: (1) Native files converted to bates numbered single page tiff files; (2) multi-page text
10 files named based on the associated bates number containing extracted or OCR text; (3) image
11 load files in Opticon or Ipro format; (4) Concordance data file to include all metadata fields
12 including Sha-1 hash value and attachment range for compound documents; (5) any Excel
13 document or native document that includes formulas in a native file format; (6) any audio files in
14 a WAV file format; and (7) any video files in an AVI file format.

15 b. The response shall include all Documents and computer programs necessary to the
16 accurate conversion, analysis, and review of the electronic data, including but not limited to
17 operating instructions, manuals and user guides, keys, legends, and codes for systems, programs,
18 files, and data fields.

19 5. This Investigative Subpoena has been issued in connection with an investigation within the
20 scope of section 131 of the California Penal Code.

21 6. No Item requested herein shall be destroyed or discarded by WITNESS until the Attorney
22 General has made a written determination that the Item in question is not necessary for
23 furtherance of this investigation.

24 7. When producing Items, identify by number the request(s) on Attachment A to which the
25 Item is responsive.

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1 **DEFINITIONS**

2 A. "80% LOWER" means a firearm receiver blank, "casting," "machined body," or unfinished
3 handgun frame, in which the fire-control cavity area is completely solid and un-machined and has
4 not reached the "stage of manufacture," as defined by the U.S. Bureau of Alcohol, Tobacco,
5 Firearms, and Explosives (ATF), and includes, but is not limited to, items commonly referred to
6 as "80% lower," "80% lower receiver," "unfinished receiver," and "80% receiver." This term
7 includes, but is not limited to, the SS80 80% Lower, any "Polymer80" 80% Lower, and the "P80
8 frame" that is part of the "Syndicate Kit," sold by YOU as shown in Exhibit 1 attached hereto.

9 B. "80% BUILD KIT" means any combination of component parts or tools that can be used to
10 MANUFACTURE a handgun made with an 80% LOWER, with or without additional component
11 parts or tools. This term includes, but is not limited to, all the items sold by YOU under the
12 heading 80% BUILD KITS, as shown in Exhibit 1 attached hereto, such as the following types of
13 products:

- 14 a. 80% LOWER,
- 15 b. "Upper Parts Kit,"
- 16 c. "Lower Parts Kit,"
- 17 d. "Polymer80 Buy Build Shoot Kit,"
- 18 e. "Slides,"
- 19 f. "Pyramid Trigger,"
- 20 g. "Builder Tool Set,"
- 21 h. "Syndicate Kit," and
- 22 i. "Upper."

23 C. "ADVERTISING" and "ADVERTISEMENT" mean any information disseminated or
24 circulated by YOU for the purposes of promoting, marketing, selling, or providing information or
25 instruction RELATING TO any products sold by YOU or YOUR stores. The terms include,
26 without limitation, web pages, videos, commercials, blog posts, social media posts, handouts,
27 brochures, catalogues, or any other marketing materials or ADVERTISEMENTS via Internet,
28 print, mail, radio, or television.

1 D. "COMMUNICATION" and "COMMUNICATIONS" mean every disclosure, transfer,
2 exchange or transmission of information, whether oral, written, or electronic, and whether face-
3 to-face, by telecommunications, telephone, computer, mail, email, text message, instant message,
4 telecopier, facsimile (fax) machine, or otherwise, including attachment(s).

5 "COMMUNICATION" and "COMMUNICATIONS" mean all "writings" as defined in
6 California Evidence Code section 250.

7 E. "COMPLAINTS" means any expression of dissatisfaction RELATING TO YOUR stores,
8 products, business practices, ADVERTISING, or provision of INSTRUCTIONAL or
9 EDUCATIONAL MATERIALS OR INFORMATION, including, but not limited to, written
10 complaints, oral complaints, and formal allegations, either brought to YOU or filed with a
11 government, judicial, or administrative body.

12 F. "DOCUMENT" means, without limitation, any "writing," as defined in Evidence Code
13 section 250 and includes originals (as defined in Evidence Code section 255) or duplicates (as
14 defined in Evidence Code section 260) of or copies of the writings, and non-identical copies
15 bearing or having any attachments, notes or marks which distinguish them from the originals, and
16 any electronic records, including, without limitation, electronic mail, spreadsheets, word
17 processing files, and records saved as .pdf or other electronic files. Electronic mail subject to this
18 Subpoena includes messages and attachments now only available on backup or archive tapes or
19 disks. If a print-out of an electronic record is a non-identical copy of the electronic version (for
20 example), because the print-out has a signature, handwritten notation, or other mark or attachment
21 not included in the computer DOCUMENT), both the electronic version in which the
22 DOCUMENT was created and the original print-out must be produced.

23 G. "INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION" means
24 any information disseminated or provided by YOU for the purposes of informing, educating, or
25 instructing consumers on a topic. The term includes, without limitation, web pages, videos,
26 commercials, blog posts, social media posts, handouts, brochures, catalogues, or any other
27 INSTRUCTIONAL OR EDUCATIONAL MATERIALS provided via Internet, print, mail, radio,
28 or television.

1 H. “INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION
2 RELATING TO the MANUFACTURE of a handgun” includes without limitation
3 INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION RELATED TO
4 the lawfulness of MANUFACTURING a handgun and instructions on how to MANUFACTURE
5 a handgun.

6 I. “MANUFACTURE” and “MANUFACTURING” mean to manufacture, assemble,
7 fabricate, construct, or build. The terms include MANUFACTURE by an individual who is not a
8 Federal Firearms Licensee (FFL), sometimes referred to as “self-manufacture.”

9 J. “PERSON” or “PERSONS” mean any natural person, corporation, company, partnership,
10 joint venture, firm, licensee, affiliate, subsidiary, association, proprietorship, agency, board,
11 authority, commission, office or other business or legal entity, whether private or governmental.

12 K. “RELATING TO,” “RELATED TO,” and “IN RELATION TO” mean constituting,
13 containing, concerning, discussing, describing, analyzing, identifying, referring to, relating to,
14 referencing, documenting, governing, regulating, directing, evidencing, or stating.

15 L. “YOU,” “YOUR,” and “GLOCKSTORE” mean GS Performance, LLC; GS Performance II,
16 LLC; LMP/Mail Order Video, Inc.; LMP Mail Order Video, Inc.; LMP Mail Order Video Inc.;
17 Glockstore; GlockStore; The Glock Store; Glockstore.com; GlockStore.com; Digital Retail
18 Display; Gun Video; Lenny Magill Productions; Magill’s Glockstore Performance & Custom;
19 Nevada Distribution Center; San Diego Sewing Company; Time Zone Internet; Time Zone
20 Multimedia; Time Zone Video; Undertechundercover.com; Website Advertising Network;
21 Youreeka Two; as well as each of their subsidiaries, affiliates and parents, predecessors and
22 successors, and all employees, partners, officers, agents, and representatives of each of them.

23 M. “and” and “or” have both conjunctive and disjunctive meanings.

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26 FAILURE TO COMPLY WITH THIS SUBPOENA WILL SUBJECT YOU TO THE
27 PROCEEDINGS AND PENALTIES PROVIDED BY LAW.
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1 Dated: November 25, 2019

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VESNA CUK
Deputy Attorney General

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ATTACHMENT “A” TO INVESTIGATIVE SUBPOENA

The Items requested are as follows:

1. Organization charts or other DOCUMENTS sufficient to (a) describe the organization of the GLOCKSTORE business in California, (b) identify the senior leaders of the GLOCKSTORE business in California, and (c) identify all business entities that operate or participate in GLOCKSTORE business in California, including all parents and subsidiaries of any such business entity.
2. Representative copies of all YOUR webpages offering or exposing for sale any component parts or tools or combination thereof that can be used to MANUFACTURE a handgun, including, but not limited to, the items sold on YOUR website under the heading 80% BUILD KITS.
3. Representative copies of all ADVERTISEMENTS RELATING TO any component parts or tools or combination thereof that can be used to MANUFACTURE a handgun targeted at, viewable by, or provided to California consumers.
4. Representative copies of all ADVERTISEMENTS RELATING TO the MANUFACTURE of a handgun targeted at, viewable by, or provided to California consumers.
5. Representative copies of all INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION RELATING TO the MANUFACTURE of a handgun targeted at, viewable by, or provided to California consumers.
6. All DOCUMENTS reflecting YOUR policies and procedures RELATING TO the sale, offering or exposing for sale, or ADVERTISING of any component parts or tools or combination thereof that can be used to MANUFACTURE a handgun to (a) California consumers and (b) consumers nationwide, including without limitation all handbooks, guidelines, scripts, talking points, operating manuals, and training manuals.
7. All DOCUMENTS reflecting YOUR policies and procedures RELATING TO ADVERTISING RELATED TO the MANUFACTURE of a handgun to (a) California consumers and (b) consumers nationwide, including without limitation all handbooks, guidelines, scripts, talking points, operating manuals, and training manuals.

1 8. All DOCUMENTS reflecting YOUR policies and procedures RELATING TO the provision
2 of INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION RELATING
3 TO the MANUFACTURE of a handgun to (a) California consumers and (b) consumers
4 nationwide, including without limitation all handbooks, guidelines, scripts, talking points,
5 operating manuals, and training manuals.

6 9. All DOCUMENTS reflecting YOUR policies and procedures RELATING TO
7 manufacturing or causing to manufacture, importing for sale, keeping for sale, offering or
8 exposing for sale, selling, or ADVERTISING of 80% LOWERS in California.

9 10. ALL DOCUMENTS reflecting YOUR policies and procedures RELATING TO the
10 manufacture or causing to manufacture, import for sale, keeping for sale, offering or exposing for
11 sale, selling, or ADVERTISING of products that are defective, damaged, unsafe, unlawful, or not
12 as they appear or as described in YOUR ADVERTISING or on YOUR website, to (a) California
13 consumers and (b) consumers nationwide, including without limitation all handbooks, guidelines,
14 scripts, talking points, operating manuals, and training manuals.

15 11. ALL DOCUMENTS reflecting YOUR policies and procedures RELATING TO
16 COMPLAINTS made by (a) California consumers and (b) consumers nationwide IN RELATION
17 TO the sale, offering or exposing for sale, or ADVERTISING of products alleged to be defective,
18 damaged, unsafe, unlawful, or not as they appear or as described in YOUR ADVERTISING or on
19 YOUR website, including without limitation all handbooks, guidelines, scripts, talking points,
20 operating manuals, and training manuals.

21 12. All DOCUMENTS reflecting YOUR policies and procedures RELATING TO orders for
22 YOUR products made by (a) California consumers and (b) consumers nationwide, including
23 without limitation regarding order processing and fulfillment, payment, shipping, returns, refunds,
24 and out of stock or backordered items (including failure to provide notification thereof), and
25 including without limitation all handbooks, guidelines, scripts, talking points, operating manuals,
26 and training manuals.

27 13. All DOCUMENTS reflecting YOUR policies and procedures RELATING TO
28 COMPLAINTS IN RELATION TO orders for YOUR products made by (a) California

1 consumers and (b) consumers nationwide, including without limitation regarding order processing
2 and fulfillment, payment, shipping, returns, refunds, and out of stock or backordered items
3 (including failure to provide notification thereof), and including without limitation all handbooks,
4 guidelines, scripts, talking points, operating manuals, and training manuals.

5 14. All DOCUMENTS and COMMUNICATIONS RELATING TO the lawfulness of the
6 MANUFACTURE of a handgun from component parts or tools in California by an individual
7 who is not a Federal Firearms Licensee (FFL).

8 15. All DOCUMENTS and COMMUNICATIONS RELATING TO the lawfulness of the sale,
9 offering or exposing for sale, or ADVERTISING of any component parts or tools or combination
10 thereof that can be used to MANUFACTURE a handgun to (a) California consumers and (b)
11 consumers nationwide.

12 16. All DOCUMENTS and COMMUNICATIONS RELATING TO the lawfulness of
13 ADVERTISING RELATED TO the MANUFACTURE of a handgun to (a) California consumers
14 and (b) consumers nationwide.

15 17. All DOCUMENTS and COMMUNICATIONS RELATING TO the lawfulness of the
16 provision of INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION
17 RELATING TO the MANUFACTURE of a handgun to (a) California consumers and (b)
18 consumers nationwide.

19 18. All DOCUMENTS and COMMUNICATIONS RELATING TO the lawfulness of
20 manufacturing or causing to manufacture, importing for sale, keeping for sale, offering or
21 exposing for sale, selling, or ADVERTISING of 80% LOWERS in California.

22 19. All COMMUNICATIONS with California consumers RELATING TO the
23 MANUFACTURE of a handgun, including without limitation regarding INSTRUCTIONAL OR
24 EDUCATIONAL MATERIALS OR INFORMATION.

25 20. All DOCUMENTS RELATING TO COMPLAINTS from California consumers
26 RELATED TO the sale, offering or exposing for sale, or ADVERTISING of component parts or
27 tools that can be used to MANUFACTURE a handgun, including without limitation with respect
28 to the items sold on YOUR website under the heading 80% BUILD KITS.

1 21. All DOCUMENTS RELATING TO COMPLAINTS from California consumers
2 RELATED TO the sale, offering or exposing for sale, or ADVERTISING of products alleged to
3 be defective, damaged, unsafe, unlawful, or not as they appear or as described in YOUR
4 ADVERTISING or on YOUR website.

5 22. All DOCUMENTS RELATING TO COMPLAINTS from California consumers
6 RELATED TO orders for YOUR products, including without limitation regarding order
7 processing and fulfillment, payment, shipping, returns, refunds, and out of stock or backordered
8 items (including failure to provide notification thereof).

9 23. DOCUMENTS sufficient to identify (a) all “pyramid trigger(s)” that YOU caused to be
10 manufactured, imported for sale, kept for sale, offered or exposed for sale, sold, or
11 ADVERTISED in California, (b) the make, model, brand, and/or manufacturer of the units, and
12 (c) the physical makeup or composition of the units.

13 24. All DOCUMENTS RELATING TO the safety of any “pyramid trigger” identified in
14 response to Request No. 23, above.

15 25. DOCUMENTS sufficient to identify (a) all 80% LOWERS that YOU manufactured or
16 caused to be manufactured, imported for sale, kept for sale, offered or exposed for sale, sold, or
17 ADVERTISED in California, (b) the make, model, brand, and/or manufacturer of the units, and
18 (c) the physical makeup or composition of the units.

19 26. All DOCUMENTS RELATING TO the safety of any 80% LOWER identified in response
20 to Request No. 25, above.

21 27. All DOCUMENTS reflecting YOUR policies and procedures RELATING TO age
22 verification of California consumers who attempt to purchase or purchase from YOU any
23 component parts or tools or combination thereof that can be used to MANUFACTURE a
24 handgun, including, but not limited to, the items sold on YOUR website under the heading 80%
25 BUILD KITS.

26 28. All DOCUMENTS referred to or relied upon in your responses to the set of investigative
27 interrogatories served contemporaneously with this subpoena.
28

EXHIBIT 1

THE WORLD'S #1 SOURCE FOR GLOCK PARTS & ACCESSORIES

HELLO. SIGN IN OR REGISTER

MY CART 0



SEARCH FOR PRODUCTS



For Expert Glock Advice Call Toll Free

800-601-8273

Glock Armorer's On Duty 7 Days A Week

LIVE CHAT

(/)

[HANDGUNS \(/HANDGUNS\)](#)

[MAGAZINES \(/MAGAZINES\)](#)

[PARTS & ACCESSORIES \(/PARTS-ACCESSORIES\)](#)

[CUSTOMIZE \(/CUSTOMIZE\)](#)

[COMPETITION \(/COMPETITION\)](#)

[CONCEALMENT \(/CONCEALMENT\)](#)

[HOLSTERS \(/HOLSTERS\)](#)

[APPAREL & GEAR \(/APPAREL-GEAR\)](#)

[MISC \(/MISC\)](#)

[PARTS BY GLOCK MODEL \(/PART-MODEL\)](#)

[VIDEOS \(HTTP://COMMUNITY.GLOCKSTORE.COM/VIDEO/\)](#)

[BLOG \(HTTP://COMMUNITY.GLOCKSTORE.COM/\)](#)

[FORUM \(HTTP://COMMUNITY.GLOCKSTORE.COM/DISCUSSION/\)](#)

OVER \$100 SHIPS FREE (<https://www.glockstore.com/free-shipping-policy>) **30-DAY GUARANTEE** (<https://www.glockstore.com/shipping-and-returns>) **TOPSHOT TUESDAY** (<https://www.glockstore.com/tst-ff-sign-up>) **TRAINING** (<https://www.glockstore.com/training>) **FREE**

[CATALOG](https://www.glockstore.com/request-catalog) (<https://www.glockstore.com/request-catalog>) **NEW PRODUCTS** (<https://www.glockstore.com/Misc/new-products>)

TOP 5 GLOCK UPGRADES

(<https://www.glockstore.com/top5home>)

CUSTOM GLOCK GALLERY

(<https://www.glockstore.com/custom-build-gallery>)

GS CUSTOM GUN SHOP

(<https://www.glockstore.com/custom>)

[HOME \(/\)](#) / [PARTS & ACCESSORIES \(/PARTS-ACCESSORIES\)](#) / [80% BUILD KITS](#)

80% BUILD KITS

GRID VIEW

([/PARTS-ACCESSORIES/POLYMER80](#)) **LIST VIEW**

([/PARTS-ACCESSORIES/POLYMER80?DISPLAY=LIST](#))

Sort by relevance

PYRAMID TRIGGER (/PARTS-ACCESSORIES/PYRAMID-TRIGGERS)

FLAT FACE PYRAMID TRIGGER (/PARTS-ACCESSORIES/FLAT-FACE)

80% BUILD KITS (/PARTS-ACCESSORIES/POLYMER80)

PERFORMANCE PARTS (/PARTS-ACCESSORIES/PERFORMANCE-PARTS)

EXTENDED CONTROLS (/PARTS-ACCESSORIES/EXTENDED-CONTROLS)

SEE MORE

FILTERED BY:

- BRAND ^
- COLOR ^
- GENERATION ^
- GUN MODEL ^
- HAND ^



(/SS80-M-Model)

★★★★★

SS80 80% LOWER (/SS80-M-MODEL)

\$129.99



(/Glock-Factory-Complete-Upper-Parts-Kit-for-Glock-43)

★★★★★

G43 COMPLETE UPPER PARTS KIT (/GLOCK-FACTORY-COMPLETE-UPPER-PARTS-KIT-FOR-GLOCK-43)

\$119.99



(/G43-Complete-Lower-Parts-Kit)

★★★★★

G43 COMPLETE LOWER PARTS KIT (/G43-COMPLETE-LOWER-PARTS-KIT)

\$89.99



(/Polymer80-Buy-Build-Shoot-Kit)

★★★★★

POLYMER80 BUY BUILD SHOOT KIT (/POLYMER80-BUY-BUILD-SHOOT-KIT)

\$575.00



STAINLESS STEEL PYRAMID CUT

(/GS-G43-Slides)

★★★★★

GS G43 SLIDES (/GS-G43-SLIDES)

\$250.00



(/Complete-Pyramid-Trigger)

★★★★★

COMPLETE PYRAMID TRIGGER (/COMPLETE-PYRAMID-TRIGGER)

\$179.99



(/Ultimate-Pyramid-Trigger)

★★★★★

ULTIMATE PYRAMID TRIGGER (/ULTIMATE-PYRAMID-TRIGGER)

\$249.99



(/SS80-Build-Set)

★★★★★

SS80 BUILDER TOOL SET (/SS80-BUILD-SET)

\$20.00

PRICE

\$20.00

\$1,200.00



SHOWN WITH S2 OPTION
(/Syndicate-Compact-Kit)



SYNDICATE KIT
(/SYNDICATE-COMPACT-KIT)

\$1,200.00



(/80-P320-Compatible-Insert-MUP-1)



80% P320 COMPATIBLE
INSERT - MUP-1 (/80-P320-COMPATIBLE-INSERT-MUP-1)

\$100.00



(/Jig-for-80-P320-Compatible-Insert-MUP-1)



JIG FOR 80% P320
COMPATIBLE INSERT -
MUP-1 (/JIG-FOR-80-P320-COMPATIBLE-INSERT-MUP-1)

\$150.00



(/Polymer-80-PF45-Textured-Full-Size-Lower)



POLYMER 80 PF45 LARGE
FRAME LOWER
(/POLYMER-80-PF45-TEXTURED-FULL-SIZE-LOWER)

\$160.00



(/Polymore80-Textured-Full-Size-Lower)



POLYMER80 V2 TEXTURED
FULL SIZE LOWER
(/POLYMORE80-



(/Polymer80-Textured-Compact-Longslide-Lower)



POLYMER80 TEXTURED
COMPACT LONGSLIDE
LOWER (/POLYMER80-



(/Spectre-Polymer80-Compact-Textured)



POLYMER80 TEXTURED
COMPACT LOWER
(/SPECTRE-POLYMER80-



(/Spectre-Polymer80-Textured-Sub-Compact-Lower)



POLYMER80 TEXTURED
SUB-COMPACT LOWER

TEXTURED-FULL-SIZE-LOWER)
\$150.00



(/Signature-Series-Upper)



COMPLETE UPPER FOR GLOCKS (/SIGNATURE-SERIES-UPPER)

\$450.00

TEXTURED-COMPACT-LONGSLIDE-LOWER)
\$150.00



(/Glock-Factory-Large-Frame-Lower-Parts-Kit-20SF-21SF-Fits-Polymer-80)



GLOCK FACTORY LARGE FRAME LOWER PARTS KIT - 20SF/21SF - FITS POLYMER 80 (/GLOCK-FACTORY-LARGE-FRAME-LOWER-PARTS-KIT-20SF-21SF-FITS-POLYMER-80)

\$89.99

COMPACT-TEXTURED)
\$150.00



(/Glock-Factory-Large-Frame-Upper-Parts-Kit-20SF-21SF-Fits-PF45)



GLOCK FACTORY LARGE FRAME UPPER PARTS KIT - 20SF/21SF - FITS PF45 (/GLOCK-FACTORY-LARGE-FRAME-UPPER-PARTS-KIT-20SF-21SF-FITS-PF45)

\$119.99

(/SPECTRE-POLYMER80-TEXTURED-SUB-COMPACT-LOWER)
\$150.00



(/Spectre-Complete-Upper-Parts-Kit)



GLOCK FACTORY FULL SIZE UPPER PARTS KIT - 17/22/31 - FITS POLYMER 80 (/SPECTRE-COMPLETE-UPPER-PARTS-KIT)

\$119.99

For use with Polymer80 Full Size Lower - PF040 (17/22/31/34/35 Style)



(/Spectre-Complete-

For use with Compact Uppers (19/23/32 Style)



(/Compact-Spectre-

For use with Polymer80 Compact Lower - PF040C (19/23/32 Style)



(/Spectre-Compact-

FOR USE WITH SUB-COMPACT UPERS (26/27/33 STYLE)



(/Spectre-Complete-Sub-

Lower-Parts-Kit)

★★★★★

**GLOCK FACTORY FULL SIZE
LOWER PARTS KIT -
17/22/31 - FITS
POLYMER 80 (/SPECTRE-
COMPLETE-LOWER-PARTS-
KIT)**

\$89.99

Complete-Upper-Parts-Kit)

★★★★★

**GLOCK FACTORY COMPACT
UPPER PARTS KIT -
19/23/32 - FITS
POLYMER80C]
(/COMPACT-SPECTRE-
COMPLETE-UPPER-PARTS-
KIT)**

\$119.99

Complete-Lower-Parts-Kit)

★★★★★

**GLOCK FACTORY COMPACT
LOWER PARTS KIT -
19/23/32 - FITS
POLYMER80C (/SPECTRE-
COMPACT-COMPLETE-
LOWER-PARTS-KIT)**

\$89.99

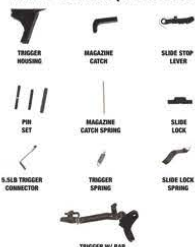
Compact-Upper-Parts-Kit)

★★★★★

**GLOCK FACTORY SUB-
COMPACT UPPER PARTS
KIT - 26/27/33 - FITS
POLYMER 80 (/SPECTRE-
COMPLETE-SUB-
COMPACT-UPPER-PARTS-
KIT)**

\$119.99

FOR USE WITH POLYMER80 SUB-COMPACT
LOWER - PF940SC (26/27/33 STYLE)



**(/Spectre-Sub-Compact-
Complete-Lower-Parts-Kit)**

★★★★★

**GLOCK FACTORY SUB-
COMPACT LOWER PARTS
KIT - 26/27/33 - FITS
POLYMER 80 (/SPECTRE-
SUB-COMPACT-
COMPLETE-LOWER-PARTS-
KIT)**

\$89.99



STANDARD

**(/Polymer80-PS9-DLC-
Stripped-Slide)**

★★★★★

**POLYMER80 PS9 DLC
STRIPPED SLIDE (G17
COMPATIBLE)
(/POLYMER80-PS9-DLC-
STRIPPED-SLIDE)**

\$375.00



(/Polymer80-PS9C-Slide)

★★★★★

**POLYMER80 PS9C SLIDE
(G19 COMPATIBLE)
(/POLYMER80-PS9C-
SLIDE)**

\$375.00



**(/Polymer80-PF-Series-
Magwell)**

★★★★★

**POLYMER80 PF-SERIES
MAGWELL (/POLYMER80-
PF-SERIES-MAGWELL)**

\$95.00



(/35-Dollar-Clip-Holster)



\$35 DOLLAR HOLSTER
(/35-DOLLAR-CLIP-HOLSTER)

\$35.00



(/40-Dollar-Holster)



\$40 DOLLAR HOLSTER
(/40-DOLLAR-HOLSTER)

\$40.00



(/30-Dollar-Holster)



\$30 DOLLAR HOLSTER
(/30-DOLLAR-HOLSTER)

\$30.00

SIGN UP FOR EXCLUSIVE SALES AND PRODUCT NEWS

username@domain.com **JOIN**

STORE LOCATOR (/RETAIL-SHOWROOM)

REQUEST A CATALOG (/REQUEST-CATALOG)

SHOP

Glock Guns (/handguns)
Performance Parts (/parts-accessories/performance-parts)

COMPANY

About Us (/about-us)
Lenny Magill (/lenny-magill)
Careers (/careers)

SUPPORT CENTER

Payment / Shipping / Returns (/shipping-and-returns)

MY ACCOUNT

LogIn To Your Account (/login-register)
Create An Account (/login-register)

CONTACT INFO

GlockStore.com
4770 Ruffner St.
San Diego, CA

| | | | | |
|--|--|---|---|--|
| Magazines (/magazines) | Testimonials (/testimonials) | Free Shipping Policy (/free-shipping-policy) | Track your Order (/purchases) | 92111 |
| Accessories (/parts-accessories) | Store Locator (/retail-showroom) | Privacy Policy (/privacy-policy) | Wish List (/wishlist) | TEL: 800-601-8273 FAX: 858-569-0505 |
| Holsters (/holsters) | Videos (http://community.glockstore.com/video) | Contact Us (/contact-us) | | Customer Service |
| Concealment (/concealment) | Blog (http://community.glockstore.com) | Request Catalog (/request-catalog) | | Telephone Hours Monday thru Friday 7am to 7pm PST |
| Custom Gun Services (/customize) | | UnderTech UnderCover Size Chart (/sizing-chart) | | Saturday and Sunday 8am to 4:30pm PST |
| Glock Factory Parts (/parts-accessories/glock-factory-parts) | | FFL Information (/ffl-info) | | |
| Bulk Ammo Transfer (/Bulk-Ammo-Transfer) | | | | |
| Top Shot Tuesday (/tst-ff-sign-up) | | | | |

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EXHIBIT E

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Senior Assistant Attorney General
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Supervising Deputy Attorney General
4 VESNA CUK (SBN 309157)
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 510-3782
6 Fax: (415) 703-5480
E-mail: vesna.cuk@doj.ca.gov
7

8
9
10 BEFORE THE DEPARTMENT OF JUSTICE
11 OFFICE OF THE ATTORNEY GENERAL
12 STATE OF CALIFORNIA

13
14 In the Matter of the Investigation of:
15 **FIREARMS AND OTHER WEAPONS**

INVESTIGATIVE INTERROGATORIES

GOV. CODE § 11180, ET SEQ.

16
17
18
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20
21
22 NOTICE TO THE PERSON SERVED:

23 You are served on behalf of:

GS PERFORMANCE, LLC

(d/b/a GLOCKSTORE)

1 Pursuant to the powers conferred by Article 2 of Chapter 2 of Division 3 of Title 2 (Cal.
2 Gov. Code, § 11180 et seq.) of the Government Code of California, on the Attorney General, as
3 head of the California Department of Justice, which powers and authority to conduct the above
4 entitled investigation have been delegated to the undersigned, an officer of that Department,

5
6 **GS PERFORMANCE, LLC (d/b/a GLOCKSTORE)**

7
8 (hereinafter "WITNESS") **IS HEREBY COMMANDED** to answer separately and fully in
9 writing, under oath, within fifteen days of service hereof, each of the interrogatories set forth
10 below.

11 **INSTRUCTIONS FOR COMPLIANCE**

- 12 1. The Relevant Time Period of these investigative interrogatories is July 1, 2010 through the
13 final response date unless otherwise expressly stated herein.
- 14 2. An answer or other appropriate response must be given to each interrogatory set forth
15 below.
- 16 3. Each answer must be as complete and straightforward as the information reasonably
17 available to WITNESS, including the information possessed by WITNESS'S attorneys or agents,
18 permits. If an interrogatory cannot be answered completely, answer it to the extent possible,
19 specifying the reasons for WITNESS'S inability to answer the remainder of the interrogatory and
20 stating whatever information, knowledge, or belief that WITNESS has concerning the
21 unanswered portion thereof.
- 22 4. If WITNESS is asserting a privilege or making an objection to an interrogatory, WITNESS
23 must specifically assert the privilege or state the objection in WITNESS'S written response, and
24 set forth in detail the basis for WITNESS'S objection or assertion of the privilege. If an objection
25 pertains to only a portion of an interrogatory, or a word, phrase, or clause contained in it,
26 WITNESS must respond to the remainder of the interrogatory.
- 27 5. WITNESS'S answers to these interrogatories must be verified, dated, and signed.
28 WITNESS may wish to use the following form at the end of its answers:

1
2 *I declare under penalty of perjury under the laws of the State of California that the*
3 *foregoing answers are true and correct.*

4 _____
5 (DATE)

6 _____
7 (SIGNATURE)

8 6. These Investigative Interrogatories have been issued in connection with an investigation
9 within the scope of section 131 of the California Penal Code.

10 7. WITNESS'S written responses shall be delivered to the California Department of Justice,
11 Office of the Attorney General, 455 Golden Gate Avenue, Suite 11000, San Francisco, CA
12 94102, ATTN: Deputy Attorney General Vesna Cuk.

13 **DEFINITIONS**

14 A. "80% LOWER" means a firearm receiver blank, "casting," "machined body," or unfinished
15 handgun frame, in which the fire-control cavity area is completely solid and un-machined and has
16 not reached the "stage of manufacture," as defined by the U.S. Bureau of Alcohol, Tobacco,
17 Firearms, and Explosives (ATF), and includes, but is not limited to, items commonly referred to
18 as "80% lower," "80% lower receiver," "unfinished receiver," and "80% receiver." This term
19 includes, but is not limited to, the SS80 80% Lower, any "Polymer80" 80% Lower, and the "P80
20 frame" that is part of the "Syndicate Kit," sold by YOU as shown in Exhibit 1 attached hereto.

21 B. "80% BUILD KIT" means any combination of component parts or tools that can be used to
22 MANUFACTURE a handgun made with an 80% LOWER, with or without additional component
23 parts or tools. This term includes, but is not limited to, all the items sold by YOU under the
24 heading 80% BUILD KITS, as shown in Exhibit 1 attached hereto, such as the following types of
25 products:

- 26 a. 80% LOWER,
- 27 b. "Upper Parts Kit,"
- 28 c. "Lower Parts Kit,"
- d. "Polymer80 Buy Build Shoot Kit,"
- e. "Slides,"
- f. "Pyramid Trigger,"

- 1 g. “Builder Tool Set,”
- 2 h. “Syndicate Kit,” and
- 3 i. “Upper.”

4 C. “ADVERTISING” and “ADVERTISEMENT” mean any information disseminated or
5 circulated by YOU for the purposes of promoting, marketing, selling, or providing information or
6 instruction RELATING TO any products sold by YOU or YOUR stores. The terms include,
7 without limitation, web pages, videos, commercials, blog posts, social media posts, handouts,
8 brochures, catalogues, or any other marketing materials or ADVERTISEMENTS via Internet,
9 print, mail, radio, or television.

10 D. “COMMUNICATION” and “COMMUNICATIONS” mean every disclosure, transfer,
11 exchange or transmission of information, whether oral, written, or electronic, and whether face-
12 to-face, by telecommunications, telephone, computer, mail, email, text message, instant message,
13 telecopier, facsimile (fax) machine, or otherwise, including attachment(s).

14 “COMMUNICATION” and “COMMUNICATIONS” mean all “writings” as defined in
15 California Evidence Code section 250.

16 E. “DESCRIBE” means to provide a complete description and explanation of the facts,
17 circumstances, analysis, and other information RELATING TO the subject matter of a specific
18 interrogatory.

19 F. “DOCUMENT” means, without limitation, any “writing,” as defined in Evidence Code
20 section 250 and includes originals (as defined in Evidence Code section 255) or duplicates (as
21 defined in Evidence Code section 260) of or copies of the writings, and non-identical copies
22 bearing or having any attachments, notes or marks which distinguish them from the originals, and
23 any electronic records, including, without limitation, electronic mail, spreadsheets, word
24 processing files, and records saved as .pdf or other electronic files. Electronic mail subject to this
25 Subpoena includes messages and attachments now only available on backup or archive tapes or
26 disks. If a print-out of an electronic record is a non-identical copy of the electronic version (for
27 example), because the print-out has a signature, handwritten notation, or other mark or attachment
28

1 not included in the computer DOCUMENT), both the electronic version in which the
2 DOCUMENT was created and the original print-out must be produced.

3 G. “IDENTIFY” or “IDENTITY” means to state:

- 4 a. in the case of a location, the physical and mailing addresses (including zip code) and
5 telephone number;
- 6 b. in the case of a natural PERSON, his or her name, business address and telephone
7 number, employer, and title or position; and
- 8 c. in the case of a PERSON other than a natural PERSON, its name, the address of its
9 principal place of business (including zip code), its telephone number, and the name of
10 its chief executive officer, the name of any PERSON that ultimately controls it, along
11 with the address (including zip code) of that PERSON’S principal place of business
12 (including zip code), telephone number, and if applicable, the name of that
13 PERSON’S chief executive officer.

14 H. “INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION” means
15 any information disseminated or provided by YOU for the purposes of informing, educating, or
16 instructing consumers on a topic. The term includes, without limitation, web pages, videos,
17 commercials, blog posts, social media posts, handouts, brochures, catalogues, or any other
18 INSTRUCTIONAL OR EDUCATIONAL MATERIALS provided via Internet, print, mail, radio,
19 or television.

20 I. “INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION
21 RELATING TO the MANUFACTURE of a handgun” includes without limitation
22 INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION RELATED TO
23 the lawfulness of MANUFACTURING a handgun and instructions on how to MANUFACTURE
24 a handgun.

25 J. “MANUFACTURE” and “MANUFACTURING” mean to manufacture, assemble,
26 fabricate, construct, or build. The terms include MANUFACTURE by an individual who is not a
27 Federal Firearms Licensee (FFL), sometimes referred to as “self-manufacture.”
28

1 K. "PERSON" or "PERSONS" mean any natural person, corporation, company, partnership,
2 joint venture, firm, licensee, affiliate, subsidiary, association, proprietorship, agency, board,
3 authority, commission, office or other business or legal entity, whether private or governmental.

4 L. "RELATING TO," "RELATED TO," and "IN RELATION TO" means constituting,
5 containing, concerning, discussing, describing, analyzing, identifying, referring to, relating to,
6 referencing, documenting, governing, regulating, directing, evidencing or stating.

7 M. "YOU," "YOUR," and "GLOCKSTORE" mean GS Performance, LLC; GS Performance II,
8 LLC; LMP/Mail Order Video, Inc.; LMP Mail Order Video, Inc.; LMP Mail Order Video Inc.;
9 Glockstore; GlockStore; The Glock Store; Glockstore.com; GlockStore.com; Digital Retail
10 Display; Gun Video; Lenny Magill Productions; Magill's Glockstore Performance & Custom;
11 Nevada Distribution Center; San Diego Sewing Company; Time Zone Internet; Time Zone
12 Multimedia; Time Zone Video; Undertechundercover.com; Website Advertising Network;
13 Youreeka Two; as well as each of their subsidiaries, affiliates and parents, predecessors and
14 successors, and all employees, partners, officers, agents, and representatives of each of them.

15 N. "and" and "or" have both conjunctive and disjunctive meanings.

16 INTERROGATORIES

17 INTERROGATORY NO. 1

18 State YOUR correct legal name and address and all other trade or business names under which
19 YOU do or have done business RELATING TO GLOCKSTORE.

20 INTERROGATORY NO. 2

21 For any component parts or tools or combination thereof that can be used to MANUFACTURE a
22 handgun that YOU sold, offered or exposed for sale, or ADVERTISED in California, including,
23 but not limited to, the items sold on YOUR website under the heading 80% BUILD KITS, state
24 the name of the item and the Stock Keeping Unit (SKU) and Universal Product Code (UPC).

25 INTERROGATORY NO. 3

26 For any component parts or tools or combination thereof that can be used to MANUFACTURE a
27 handgun that YOU sold to a California consumer, including, but not limited to, the items sold on
28 YOUR website under the heading 80% BUILD KITS, state the following:

- 1 a. The SKU or UPC of the item,
- 2 b. The purchase price,
- 3 c. The date of sale,
- 4 d. The IDENTITY of the purchaser,
- 5 e. The method of sale (e.g., over the Internet, by phone, or in-store),
- 6 f. The method of delivery (e.g., shipped for delivery, picked up in-store, or direct in-
- 7 store purchase),
- 8 g. The IDENTITY of (i) the location where the item was warehoused and (ii) the
- 9 location it was shipped from, and
- 10 h. The delivery address, in-store pickup location, or in-store address for direct purchases,
- 11 as applicable.

12 INTERROGATORY NO. 4

13 For all 80% LOWERS identified in response to Interrogatory No. 2, above, state the following:

- 14 a. The SKU or UPC of the unit,
- 15 b. The make, model, brand, and/or manufacturer,
- 16 c. The IDENTITY of the manufacturer, and
- 17 d. Whether the unit is manufactured or assembled from polymer plastic, and if so,
- 18 whether it contains stainless steel material and how much.

19 INTERROGATORY NO. 5

20 For each of YOUR webpages offering for sale any component parts or tools or combination
21 thereof that can be used to MANUFACTURE a handgun, including, but not limited to, the items
22 sold on YOUR website under the heading 80% BUILD KITS, state the following:

- 23 a. The Uniform Resource Locator (URL) of the webpage,
- 24 b. The dates on which the webpage was available on the Internet,
- 25 c. The number of views by consumers nationwide, and
- 26 d. The number of views by California consumers.

27
28

1 INTERROGATORY NO. 6

2 For each Internet ADVERTISEMENT RELATING TO any component parts or tools or
3 combination thereof that can be used to MANUFACTURE a handgun, targeted at, viewable by,
4 or provided to California consumers, including, but not limited to, ADVERTISEMENTS for the
5 items sold on YOUR website under the heading 80% BUILD KITS, state the following:

- 6 a. The URL of the associated website,
- 7 b. The dates on which the ADVERTISEMENT was available on the Internet,
- 8 c. The number of views by consumers nationwide, and
- 9 d. The number of views by California consumers.

10 INTERROGATORY NO. 7

11 For each Internet ADVERTISEMENT RELATING TO the MANUFACTURE of a handgun
12 targeted at, viewable by, or provided to California consumers, state the following:

- 13 a. The URL of the associated website,
- 14 b. The dates on which the ADVERTISEMENT was available on the Internet,
- 15 c. The number of views by consumers nationwide, and
- 16 d. The number of views by California consumers.

17 INTERROGATORY NO. 8

18 For any INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION
19 RELATING TO the MANUFACTURE of a handgun targeted at, viewable by, or provided to
20 California consumers via the Internet, state the following:

- 21 a. The URL of the website,
- 22 b. The dates the materials or information were available on the Internet,
- 23 c. The number of views by consumers nationwide, and
- 24 d. The number of views by California consumers.

25 INTERROGATORY NO. 9

26 For each print ADVERTISEMENT for any component parts or tools or combination thereof that
27 can be used to MANUFACTURE a handgun, targeted at, viewable by, or provided to California
28

1 consumers, including, but not limited to, ADVERTISEMENTS for the items sold on YOUR
2 website under the heading 80% BUILD KITS, state the following, as applicable:

- 3 a. The IDENTITY of the publication and publisher,
- 4 b. The dates the ADVERTISEMENT was in circulation,
- 5 c. The locations of circulation by zip code,
- 6 d. The number of copies circulated by zip code,
- 7 e. The IDENTITY of YOUR stores providing the ADVERTISEMENT directly to
8 consumers,
- 9 f. The number of copies distributed directly to consumers by each of YOUR stores, and
10 g. The total number of copies circulated in California.

11 INTERROGATORY NO. 10

12 For each print ADVERTISEMENT RELATING TO the MANUFACTURE of a handgun
13 targeted at, viewable by, or provided to California consumers, state the following, as applicable:

- 14 a. The IDENTITY of the publication and publisher,
- 15 b. The dates the ADVERTISEMENT was in circulation,
- 16 c. The locations of circulation by zip code,
- 17 d. The number of copies circulated by zip code,
- 18 e. The IDENTITY of YOUR stores providing the ADVERTISEMENT directly to
19 consumers,
- 20 f. The number of copies distributed directly to consumers by each of YOUR stores, and
21 g. The total number of copies circulated in California.

22 INTERROGATORY NO. 11

23 For any INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION
24 RELATING TO the MANUFACTURE of a handgun targeted at, viewable by, or provided to
25 California consumers in print, state the following:

- 26 a. The IDENTITY of the publication and publisher,
- 27 b. The dates of circulation,
- 28 c. The locations of circulation by zip code,

- d. The number of copies circulated by zip code,
- e. The IDENTITY of YOUR stores providing the materials or information directly to consumers,
- f. The number of copies distributed directly to consumers by each of YOUR stores, and
- g. The total number of copies circulated in California.

INTERROGATORY NO. 12

For each radio or television ADVERTISEMENT for any component parts or tools or combination thereof that can be used to MANUFACTURE a handgun, targeted at, viewable by, or provided to California consumers, including, but not limited to, ADVERTISEMENTS for the items sold on YOUR website under the heading 80% BUILD KITS, state the following:

- a. The IDENTITY of the station on which the ADVERTISEMENT was run,
- b. The dates and times the ADVERTISEMENT was run,
- c. The number of times the ADVERTISEMENT was run nationwide,
- d. The number of times the ADVERTISEMENT was run in California, and
- e. The estimated, anticipated, desired, or known number of viewers or listeners for the ADVERTISEMENT nationwide, as applicable, and
- f. The estimated, anticipated, desired, or known number of viewers or listeners for the ADVERTISEMENT in California, as applicable.

INTERROGATORY NO. 13

For each radio or television ADVERTISEMENT RELATING TO the MANUFACTURE of a handgun targeted at, viewable by, or provided to California consumers, state the following:

- a. The IDENTITY of the station on which the ADVERTISEMENT was run,
- b. The dates and times the ADVERTISEMENT was run,
- c. The number of times the ADVERTISEMENT was run nationwide,
- d. The number of times the ADVERTISEMENT was run in California, and
- e. The estimated, anticipated, desired, or known number of viewers or listeners for the ADVERTISEMENT nationwide, as applicable, and

- 1 f. The estimated, anticipated, desired, or known number of viewers or listeners for the
2 ADVERTISEMENT in California, as applicable.

3 INTERROGATORY NO. 14

4 For any INSTRUCTIONAL OR EDUCATIONAL MATERIALS OR INFORMATION
5 RELATING TO the MANUFACTURE of a handgun targeted at, viewable by, or provided to
6 California consumers via radio or television, state the following:

- 7 a. The IDENTITY of the station on which it was provided,
8 b. The dates and times it was provided,
9 c. The number of times it was provided nationwide,
10 d. The number of times it was provided in California, and
11 e. The estimated, anticipated, desired, or known number of viewers or listeners
12 nationwide, as applicable, and
13 f. The estimated, anticipated, desired, or known number of viewers or listeners in
14 California, as applicable.

15 INTERROGATORY NO. 15

16 DESCRIBE YOUR policies and procedures regarding the sale, offering or exposing for sale, or
17 ADVERTISING in California of any component parts or tools or combination thereof that can be
18 used to MANUFACTURE a handgun, including, but not limited to, with respect to the items sold
19 on YOUR website under the heading 80% BUILD KITS.

20 INTERROGATORY NO. 16

21 DESCRIBE any training provided to employees regarding the sale, offering or exposing for sale,
22 or ADVERTISING in California of any component parts or tools or combination thereof that can
23 be used to MANUFACTURE a handgun, including, but not limited to, with respect to the items
24 sold on YOUR website under the heading 80% BUILD KITS.

25 INTERROGATORY NO. 17

26 DESCRIBE YOUR policies and procedures regarding ADVERTISING in California RELATING
27 TO the MANUFACTURE of a handgun.

28 INTERROGATORY NO. 18

1 DESCRIBE any training provided to employees regarding ADVERTISING in California
2 RELATING TO the MANUFACTURE of a handgun.

3 INTERROGATORY NO. 19

4 DESCRIBE YOUR policies and procedures regarding providing INSTRUCTIONAL OR
5 EDUCATIONAL MATERIALS OR INFORMATION RELATING TO the MANUFACTURE of
6 a handgun in California.

7 INTERROGATORY NO. 20

8 DESCRIBE any training provided to employees regarding providing INSTRUCTIONAL OR
9 EDUCATIONAL MATERIALS OR INFORMATION RELATING TO the MANUFACTURE of
10 a handgun in California.

11 INTERROGATORY NO. 21

12 DESCRIBE YOUR policies and procedures regarding the manufacture or causing to
13 manufacture, import for sale, keeping for sale, offering or exposing for sale, selling, or
14 ADVERTISING of products that are defective, damaged, unsafe, unlawful, or not as they appear
15 or as described in YOUR ADVERTISING or on YOUR website.

16 INTERROGATORY NO. 22

17 DESCRIBE YOUR policies and procedures regarding COMPLAINTS made by (a) California
18 consumers and (b) consumers nationwide regarding the sale, offering or exposing for sale, or
19 ADVERTISING of products alleged to be defective, damaged, unsafe, unlawful, or not as they
20 appear or as described in YOUR ADVERTISING or on YOUR website.

21 INTERROGATORY NO. 23

22 DESCRIBE any training provided to employees regarding COMPLAINTS made by (a) California
23 consumers and (b) consumers nationwide regarding the sale, offering or exposing for sale, or
24 ADVERTISING of products alleged to be defective, damaged, unsafe, unlawful, or not as they
25 appear or as described in YOUR ADVERTISING or on YOUR website.

26 INTERROGATORY NO. 24

27 DESCRIBE YOUR policies and procedures regarding orders for YOUR products made by (a)
28 California consumers and (b) consumers nationwide, including without limitation regarding order

1 processing and fulfillment, payment, shipping, returns, refunds, and out of stock or backordered
2 items (including failure to provide notification thereof).

3 INTERROGATORY NO. 25

4 DESCRIBE any training provided to employees regarding orders for YOUR products made by (a)
5 California consumers and (b) consumers nationwide, including without limitation regarding order
6 processing and fulfillment, payment, shipping, returns, refunds, and out of stock or backordered
7 items (including failure to provide notification thereof).

8 INTERROGATORY NO. 26

9 DESCRIBE YOUR policies and procedures regarding COMPLAINTS IN RELATION TO orders
10 for YOUR products made by (a) California consumers and (b) consumers nationwide, including
11 without limitation regarding order processing and fulfillment, payment, shipping, returns, refunds,
12 and out of stock or backordered items (including failure to provide notification thereof).

13 INTERROGATORY NO. 27

14 DESCRIBE any training provided to employees regarding COMPLAINTS IN RELATION TO
15 orders for YOUR products made by (a) California consumers and (b) consumers nationwide,
16 including without limitation regarding order processing and fulfillment, payment, shipping,
17 returns, refunds, and out of stock or backordered items (including failure to provide notification
18 thereof).

19 INTERROGATORY NO. 28

20 DESCRIBE YOUR policies and procedures RELATING TO age verification of California
21 consumers who attempt to purchase or purchase from YOU any component parts or tools or
22 combination thereof that can be used to MANUFACTURE a handgun, including, but not limited
23 to, the items sold on YOUR website under the heading 80% BUILD KITS.

24 INTERROGATORY NO. 29

25 Identify all third parties and third party products that YOU use in connection with conducting age
26 verification of California consumers attempting to purchase or purchasing YOUR products.

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1 FAILURE TO COMPLY WITH THIS SUBPOENA WILL SUBJECT YOU TO THE
2 PROCEEDINGS AND PENALTIES PROVIDED BY LAW.

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Dated: November 25, 2019



VESNA CUK
Deputy Attorney General

EXHIBIT 1

THE WORLD'S #1 SOURCE FOR GLOCK PARTS & ACCESSORIES

HELLO. SIGN IN OR REGISTER

MY CART 0



For Expert Glock Advice Call Toll Free
800-601-8273
Glock Armorer's On Duty 7 Days A Week

SEARCH FOR PRODUCTS



LIVE CHAT

(/)

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[PARTS & ACCESSORIES \(/PARTS-ACCESSORIES\)](#)

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[CONCEALMENT \(/CONCEALMENT\)](#)

[HOLSTERS \(/HOLSTERS\)](#)

[APPAREL & GEAR \(/APPAREL-GEAR\)](#)

[MISC \(/MISC\)](#)

[PARTS BY GLOCK MODEL \(/PART-MODEL\)](#)

[VIDEOS \(HTTP://COMMUNITY.GLOCKSTORE.COM/VIDEO/\)](#)

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80% BUILD KITS

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SS80 80% LOWER (/SS80-M-MODEL)

\$129.99



(/Glock-Factory-Complete-Upper-Parts-Kit-for-Glock-43)

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(/Complete-Pyramid-Trigger)

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\$20.00

\$1,200.00



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SYNDICATE KIT
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(/80-P320-Compatible-Insert-MUP-1)



80% P320 COMPATIBLE
INSERT - MUP-1 (/80-P320-COMPATIBLE-INSERT-MUP-1)

\$100.00



(/Jig-for-80-P320-Compatible-Insert-MUP-1)



JIG FOR 80% P320
COMPATIBLE INSERT -
MUP-1 (/JIG-FOR-80-P320-COMPATIBLE-INSERT-MUP-1)

\$150.00



(/Polymer-80-PF45-Textured-Full-Size-Lower)



POLYMER 80 PF45 LARGE
FRAME LOWER
(/POLYMER-80-PF45-TEXTURED-FULL-SIZE-LOWER)

\$160.00



(/Polymore80-Textured-Full-Size-Lower)



POLYMER80 V2 TEXTURED
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(/Spectre-Polymer80-Compact-Textured)



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(/SPECTRE-POLYMER80-



(/Spectre-Polymer80-Textured-Sub-Compact-Lower)



POLYMER80 TEXTURED
SUB-COMPACT LOWER

Lower-Parts-Kit)

★★★★★

GLOCK FACTORY FULL SIZE LOWER PARTS KIT - 17/22/31 - FITS POLYMER 80 (/SPECTRE-COMPLETE-LOWER-PARTS-KIT)

\$89.99

Complete-Upper-Parts-Kit)

★★★★★

GLOCK FACTORY COMPACT UPPER PARTS KIT - 19/23/32 - FITS POLYMER80C] (/COMPACT-SPECTRE-COMPLETE-UPPER-PARTS-KIT)

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Complete-Lower-Parts-Kit)

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GLOCK FACTORY COMPACT LOWER PARTS KIT - 19/23/32 - FITS POLYMER80C (/SPECTRE-COMPACT-COMPLETE-LOWER-PARTS-KIT)

\$89.99

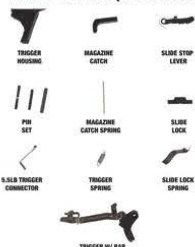
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FOR USE WITH POLYMER80 SUB-COMPACT LOWER - PF940SC (26/27/33 STYLE)



(/Spectre-Sub-Compact-Complete-Lower-Parts-Kit)

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\$89.99



STANDARD

(/Polymer80-PS9-DLC-Stripped-Slide)

★★★★★

POLYMER80 PS9 DLC STRIPPED SLIDE (G17 COMPATIBLE) (/POLYMER80-PS9-DLC-STRIPPED-SLIDE)

\$375.00



(/Polymer80-PS9C-Slide)

★★★★★

POLYMER80 PS9C SLIDE (G19 COMPATIBLE) (/POLYMER80-PS9C-SLIDE)

\$375.00



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★★★★★

POLYMER80 PF-SERIES MAGWELL (/POLYMER80-PF-SERIES-MAGWELL)

\$95.00



(/35-Dollar-Clip-Holster)



\$35 DOLLAR HOLSTER
(/35-DOLLAR-CLIP-HOLSTER)

\$35.00



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\$30 DOLLAR HOLSTER
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GlockStore.com
4770 Ruffner St.
San Diego, CA

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EXHIBIT F

| | | | | |
|---|---------------|----------------|------------|--------------|
| CALIFORNIA DEPARTMENT OF JUSTICE OFFICE OF THE ATTORNEY GENERAL Nicklas A. Akers, Senior Assistant Attorney General (SBN 21222) Michael E. Elisofon, Supervising Deputy Attorney General (SBN 240707) Vesna Cuk, Deputy Attorney General (SBN 309157) 455 Golden Gate Avenue, Suite 11000 San Francisco, California 94102 | | (415) 510-3782 | | |
| BEFORE THE DEPARTMENT OF JUSTICE OFFICE OF THE ATTORNEY GENERAL STATE OF CALIFORNIA | | | | |
| In the Matter of the Investigation of: | | | | |
| FIREARMS AND OTHER WEAPONS | | | | |
| PROOF OF SERVICE | HEARING DATE: | TIME: | DEPT/DIV.: | CASE NUMBER: |

1. At the time of service I was at least 18 years of age and not a party to this action, and I served copies of the *(specify document(s))*:
INVESTIGATIVE SUBPOENA GOV. CODE § 11180, ET SEQ.; INVESTIGATIVE INTERROGATORIES GOV. CODE § 11180, ET SEQ.; LETTER ADDRESSED TO GS PERFORMANCE, LLC (d/b/a GLOCKSTORE) c/o LEONARD L. MAGILL dated November 25, 2019

2. a. Party served: **GS PERFORMANCE, LLC (d/b/a GLOCKSTORE) c/o Leonard Magill**

b. Person served: **Kyle Parker, Controller, authorized person to accept service of process**

c. Address: **4770 Ruffner Street
San Diego, California 92111**

3. I served the party in item 2

a. by personally delivering the copies (1) on *(date)*: **11/25/2019**
 (2) at *(time)*: **01:02 p.m**

b. Declaration of diligence is attached stating actions taken first to attempt personal service.

4. Person serving *(name, address, and telephone No.)*:

Richard Wilson
Ace Attorney Service, Inc.
 444 West C Street, Suite 410
 San Diego, California 92101
 (619) 235-8400

Fee for service: \$

Registered California process server.
 (1) Employee or independent contractor.
 (2) Registration No.: **3188**
 (3) County: **SAN DIEGO**

5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: **November 27, 2019**



(signature)

#1796992R

