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[EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT CODE
SECTION 6103]

18 *Attorneys for Plaintiff*
19 *The People of the State of California*

20 SUPERIOR COURT OF THE STATE OF CALIFORNIA
21 COUNTY OF SAN FRANCISCO
22 UNLIMITED JURISDICTION

23 **THE PEOPLE OF THE STATE OF
24 CALIFORNIA,**

25 Plaintiff,

26 v.

27 **GATATALOG FOUNDATION INC., a Florida
28 corporation; CTRLPEW LLC, a Florida
limited liability company; ALEXANDER
HOLLADAY; MATTHEW LAROSIERE;
JOHN ELIK AKA "Ivan The Troll"; and
DOES 1 through 100, inclusive,**

Defendants.

Case No.

**COMPLAINT FOR PERMANENT
INJUNCTION, CIVIL PENALTIES,
AND OTHER EQUITABLE RELIEF**

(Civ. Code §§ 3273.61, 3273.625; Bus. &
Prof. Code § 17200 et seq.)

[VERIFIED ANSWER REQUIRED
PURSUANT TO CODE OF CIVIL
PROCEDURE SECTION 446.]

1 The People of the State of California (“the People” or “Plaintiff”), by and through Rob
2 Bonta, Attorney General of the State of California, and David Chiu, the City Attorney of San
3 Francisco, allege the following on information and belief:

4 INTRODUCTION

5 1. The People bring this action against Catalog Foundation Inc., CTRLPew LLC,
6 Alexander Holladay, Matthew Larosiere, and John Elik (a/k/a “Ivan The Troll”) for unlawfully
7 distributing computer code for 3D printing firearms and prohibited firearm accessories and for
8 promoting and facilitating the unlawful manufacture of 3D printed firearms and firearm
9 accessories in violation of Civil Code sections 3273.61 and 3273.625 and the Unfair Competition
10 Law (Bus. and Prof. Code § 17200 et seq.).

11 2. California faces a public safety crisis from the proliferation of unserialized,
12 untraceable, and unsafe firearms—commonly called ghost guns—sweeping across the state and
13 the rise of dangerous firearm accessories such as auto-sears, which are used to convert semi-
14 automatic firearms into machineguns. In 2015, California law enforcement agencies recovered
15 just 26 ghost guns from suspected criminal activity. From 2021 through 2025, they recovered an
16 average of over 11,000 ghost guns and auto-sears per year.¹

17 3. 3D printed guns are a growing subset of ghost guns in California. They are easy to
18 produce with 3D printing equipment and materials readily available for purchase online or at
19 common retailers, such as a 3D printer and plastic filament, and firearm parts widely available for
20 purchase from firearm dealers or parts suppliers. And they can be fully assembled in less than a
21 day.

22 4. California has responded with laws that specifically prohibit 3D printing firearms and
23 prohibited firearm accessories without a license to manufacture firearms, and since 2023, has also
24 prohibited the distribution of computer code for printing them to those without a license. As of
25 January 1, 2026, it is also unlawful to knowingly, willfully, or recklessly aid, abet, promote, or

26 _____
27 ¹ These figures represent ghost guns and auto-sears reported directly to the California
28 Department of Justice, Division of Law Enforcement, Bureau of Firearms. For 2021-2023, they
include reports of seized ghost guns, and for 2024-2025, they include reports of seized ghost guns
as well as auto-sears.

facilitate the “unlawful manufacture of firearms,” which includes the manufacture of a firearm using a 3D printer by an unlicensed person.

5. Defendants ignore these prohibitions by making computer code and instructions for producing over 150 different designs of lethal firearms and prohibited firearm accessories available to anyone with access to the Internet, including in California. Defendants conduct their illegal activities through two websites that they own, control, or manage: thegatalog.com and ctrlpew.com. Each website links to profiles that Defendants maintain on Odysee.com, an online video and filesharing platform² through which Defendants make the code available. To subsidize their operations, Defendants also sell merchandise related to 3D printed firearms and solicit donations.

6. The threat posed by Defendants' conduct is very real. As part of their investigation, the People used Defendants' code to build a fully functioning Glock-style handgun. The People downloaded the code and instructions necessary for building this deadly weapon from Defendants' website with a few simple keystrokes. The download was performed from a computer in San Francisco with a California-based IP address.

7. The People bring this action to stop Defendants from continuing the spread of unlawfully 3D printed firearms and prohibited firearm accessories in California.

PARTIES

8. Plaintiff is the People of the State of California. The People bring this action by and through Rob Bonta, Attorney General of the State of California, and David Chiu, the City Attorney of the City and County of San Francisco. The Attorney General and City Attorney are authorized to bring an action enforcing Civil Code sections 3273.61 and 3273.625 under subdivisions (c) and (c)(2) of those sections, respectively. They are also authorized to bring an action to enforce the Unfair Competition Law under Business and Professions Code sections 17203, 17204, and 17206.

² Odysee is similar to video-sharing platform YouTube but also allows users to share non-video files. Odysee is not a defendant in this action.

1 9. Defendant Gatalog Foundation Inc. is a Florida corporation with its principal place of
2 business in Orlando, Florida. Gatalog Foundation Inc. was formed in 2021. From 2019-2021, the
3 company was known as Deterrence Dispensed, an unincorporated association.

4 10. Defendant CTRLPew LLC is a Florida limited liability company with its principal
5 place of business in Orlando, Florida. It was formed in Iowa in 2020 and has been registered in
6 Florida since 2023.

7 11. Defendant Alexander Holladay, an individual, is a principal of Gatalog Foundation
8 Inc. and of CTRLPew LLC. He the Treasurer of Gatalog Foundation Inc. and Manager and
9 Registered Agent of CTRLPew LLC.

10 12. Defendant Matthew Larosiere, an individual, is the President and Registered Agent of
11 Gatalog Foundation Inc.

12 13. Defendant John Elik, an individual, is the Director of Gatalog Foundation Inc. He
13 operates on the internet under the alias “IvanTheTroll.”

14 14. Plaintiff is not aware of the true names and capacities of defendants sued herein as
15 DOES 1 through 100, inclusive, and, therefore, sues these defendants by such fictitious names.
16 Each fictitiously named defendant is responsible in some manner for the violations of law alleged.
17 Plaintiff will amend this Complaint to add the true names of the fictitiously named defendants
18 once they are discovered. Whenever reference is made in this Complaint to “Defendants,” such
19 reference shall include DOES 1 through 100 as well as the named defendants.

20 15. The defendants identified in Paragraphs 9 through 14 above are hereafter referred to
21 collectively in this Complaint as “Defendants” or “Gatalog.”

22 16. At all relevant times, each Defendant acted individually and jointly with every other
23 named Defendant in committing all acts alleged in this Complaint.

24 17. At all relevant times, each Defendant acted: (a) as a principal; (b) under express or
25 implied agency; and/or (c) with actual or ostensible authority to perform the acts alleged in this
26 Complaint on behalf of every other named Defendant.

27 18. At all relevant times, some or all Defendants acted as the agent of the others, and all
28 Defendants acted within the scope of their agency if acting as an agent of another.

1 19. At all relevant times, each Defendant knew or realized, or should have known or
2 realized, that the other Defendants were engaging in or planned to engage in the violations of law
3 alleged in this Complaint. Knowing or realizing that the other Defendants were engaging in such
4 unlawful conduct, each Defendant nevertheless facilitated the commission of those unlawful acts.
5 Each Defendant intended to and did encourage, facilitate, or assist in the commission of the
6 unlawful acts, and thereby aided and abetted the other Defendants and other third parties in the
7 unlawful conduct.

8 20. Defendants have engaged in a conspiracy, common enterprise, and common course of
9 conduct, the purpose of which is and was to engage in the violations of law alleged in this
10 Complaint. The conspiracy, common enterprise, and common course of conduct continue to the
11 present.

12 21. Defendants are alter egos of each other. There is a unity of interest and ownership
13 between and among Defendants, such that in reality they have no separate personalities.
14 Defendants have used the corporate form to perpetrate fraud and accomplish other wrongful and
15 inequitable acts, including those alleged in this Complaint. Failure to hold Defendants liable for
16 the wrongful acts of their alter egos would lead to an inequitable and unjust result.

17 22. At all relevant times, Defendants distributed or caused to be distributed digital
18 firearm manufacturing code into California to unauthorized individuals. At all relevant times,
19 Defendants aided, abetted, promoted, or facilitated the unlawful manufacture of firearms in
20 California, including by distributing digital code and associated instructions that are intended to
21 and do enable the manufacture or production of firearms using a 3D printer into California.

JURISDICTION AND VENUE

23 23. This Court has original jurisdiction over this action pursuant to California
24 Constitution article VI, section 10.

24. This Court has jurisdiction over Defendants because Defendants intentionally availed
themselves of the benefits and protections of California including by: distributing digital firearm
manufacturing code and associated instructions into California, including digital firearm
manufacturing code and instructions specifically aimed at California users; selling associated

1 merchandise directed to a California audience; directing website users to avail themselves of
2 protections provided by California law; and soliciting and accepting donations from California to
3 support the distribution of digital firearms code. The exercise of jurisdiction over Defendants by
4 California courts is therefore consistent with traditional notions of fair play and substantial
5 justice.

6 25. The violations of law alleged in this Complaint occurred in the City and County of
7 San Francisco and elsewhere throughout California.

8 26. Venue is proper in this Court pursuant to Code of Civil Procedure section 395.5
9 because Defendants' solicitation, marketing, sales, and distribution activities included San
10 Francisco and therefore Defendants' liability arises in the City and County of San Francisco.

11 27. Venue is also proper in this Court pursuant to Code of Civil Procedure section 393,
12 subdivision (a) because violations of law that occurred in the City and County of San Francisco
13 are a “part of the cause” upon which the Plaintiff seeks the recovery of penalties imposed by
14 statute.

FACTUAL BACKGROUND

I. 3D Printed Ghost Guns and Prohibited Firearm Accessories Are a Grave Threat to Public Safety

A. Ghost Guns Evade Federal and State Gun Laws

18 28. Under state and federal law, firearms must be sold with an identifying serial number
19 and are subject to various point-of-sale requirements, including a background check. The
20 serialization requirement ensures that firearms used in crimes are traceable by law enforcement,
21 which is essential to solving gun-related crimes. And the background check requirement helps
22 prevent dangerous weapons like firearms from ending up in the hands of prohibited persons, such
23 as persons convicted of dangerous felonies, persons subject to domestic violence or gun violence
24 restraining orders, persons involuntarily hospitalized for dangerousness due to mental health
25 disorders, and underage individuals.

26 29. Ghost guns bypass this process. Ghost guns are firearms that lack a serial number
27 and are made by private, unlicensed individuals from firearm products sold or produced without a
28

1 background check.³ Because they are not serialized, ghost guns are effectively untraceable by
2 law enforcement. And because they are manufactured privately, often in one's home, they bypass
3 critical safeguards like background checks. In this way, ghost guns unlawfully circumvent
4 traditional gun control measures.

5 30. The key component of a gun—and the component that is privately manufactured
6 without a serial number to produce a ghost gun—is typically what is referred to as a frame (for
7 handguns) or a receiver (for rifles and shotguns). For most models of firearms, the frame or
8 receiver serves as the central housing for the operational mechanism of the firearm. These frames
9 and receivers are regulated as firearms by federal and state firearms laws, and as such must be
10 serialized and sold pursuant to a background check. (For some firearm models, the critical
11 component may be another part of the gun, and in such case, it is that component that is regulated
12 by firearms laws.)

13 31. Historically, ghost guns were typically assembled from unserialized, *incomplete*
14 frames or receivers, or kits containing these products, that were sold without a background check.
15 The incomplete frames or receivers could readily be converted into finished frames or receivers
16 using a drill and common hand tools and then, combined with store-bought firearm parts (also
17 generally not serialized or subject to a background check) or parts sold within the kits, readily
18 assembled into fully functioning unserialized firearms.

19 32. As discussed further below, federal and state regulation of the above incomplete
20 frame and receiver products has become more stringent, and ghost guns are increasingly being
21 manufactured by using widely available consumer-grade 3D printers or computer-numerical-
22 control (“CNC”) milling machines. Typically, 3D printers or CNC milling machines are being
23 used to produce the frame or receiver of the weapon, and like with the above products, combined
24 with store-bought firearm parts to produce a fully functioning unserialized firearm. 3D printers
25

26 ³ California law does not prohibit unlicensed individuals from manufacturing firearms
27 from *serialized* firearm products, such as serialized frames or receivers or serialized incomplete
28 frames or receivers, that were purchased pursuant to a background check; unlicensed individuals
may lawfully manufacture up to three such firearms per year for personal use. See Pen. Code §
29010.

and CNC milling machines may also be used to produce nearly all of the components of a functioning firearm.

33. These illicit, unserialized, and untraceable weapons pose a grave and urgent danger to the People of California. California's ghost-gun crisis has escalated dramatically over the past decade. In 2015, state and local law enforcement agencies reported the recovery of just 26 ghost guns to the California Department of Justice, Division of Law Enforcement, Bureau of Firearms. By 2021-2025, the law enforcement agencies reported an average of over 11,000 ghost guns and auto-sears (i.e., machinegun conversion devices) recovered per year.⁴

34. National data reflect a similarly alarming increase. Between 2017 and 2023, U.S. law enforcement agencies recovered 92,702 suspected ghost guns.⁵ Annual recoveries exploded from 1,629 in 2017 to 27,490 in 2023—a 1,688% rise in just six years.⁶

35. California bears a disproportionate share of this national crisis. From 2017 to 2021, it was responsible for 55% of the nearly 38,000 ghost gun traces reported to the U.S. Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”).⁷

36. Ghost guns also pose a serious threat to public safety in San Francisco. In 2022, San Francisco had the third highest instances of ghost guns involved in crimes for cities in California. In 2020, ghost guns made up 44% of firearms recovered in homicides in San Francisco. And between 2022 and 2025, the San Francisco Police Department (“SFPD”) recovered hundreds of ghost guns in connection with crimes.

B. Digital Firearm Code Files Fuel the Proliferation of Ghost Guns and Lethal Firearm Accessories

37. 3D printed firearms represent a rapidly expanding subset of the ghost gun threat. They are cheap and increasingly easy to produce as 3D printing technology continues to advance.

⁴ For 2021-2023, these figures include reports of seized ghost guns, and for 2024-2025, they include reports of seized ghost guns as well as auto-sears.

⁵ U.S. Department of Justice, *National Firearms Commerce & Trafficking Assessment – Volume IV, Part V: Privately Made Firearms Updates and New Analysis* 5 (January 2025), <<https://www.atf.gov/media/18631/download>> (as of Feb. 5, 2026).

6 *Id.*

⁷ *Id.* at 6.

1 Moreover, following the U.S. Supreme Court’s decision upholding an ATF rule regulating ghost
2 gun “kits” as firearms subject to serialization and background check requirements, 3D printed
3 guns have become more appealing as an alternative way to circumvent gun control laws.

4 38. Widely available consumer-grade 3D printers capable of printing firearm parts,
5 frames, receivers, and accessories now start at about \$200 and are compact enough to fit on a
6 small table. A single spool of PLA+ polymer filament, for example—the only other material
7 required—costs approximately \$20-30 and may be sufficient to print multiple firearm
8 components. By way of comparison, a typical Glock model handgun retails for around \$500 or
9 more.

10 39. The software needed to operate most 3D printers—called a “slicer” software—is
11 available for free online.

12 40. The only other item necessary to produce a 3D printed gun or firearm accessory is the
13 digital code file for the printer. As discussed below, through the Gatalog repositories, the
14 Defendants in this case made the code files for over 150 3D-printed firearms and prohibited
15 firearm accessories available for anyone to download from the Internet. Defendants’ codes are
16 also accompanied by instructions on how to print the components and assemble them into
17 functional weapons.

18 41. The process for printing a 3D printed firearm is straightforward. A user downloads
19 the digital code and opens it up in a slicer software. After setting the necessary parameters and
20 settings—many of which Defendants specify in the instructions accompanying their digital
21 code—the slicer software takes the code file and settings and transmits programming instructions
22 (called “gcode”) to the 3D printer. The 3D printer then deploys layer upon layer of the molten
23 polymer filament onto the print bed in the patterns specified by the code. As the plastic cools, it
24 hardens, creating the final 3D-printed firearm or accessory.

25 42. Through this process, users can quickly, relatively inexpensively, and easily produce
26 a frame or receiver for a firearm without a serial number. 3D printed frames and receivers can
27 then be combined with other parts—which may be bought in stores or in many cases produced
28 using a 3D printer—to make a complete, untraceable, and unserialized gun. The assembly

1 process is easy, even for novices. Defendants' code files often contain instructions on how to
2 combine the components contained in the files with other parts to complete the "build" and
3 produce an operational weapon. And Defendants sell parts kits that can be used to complete the
4 3D printed firearms for which they distribute digital firearms codes. As described below, the
5 People were able to print and assemble a handgun using Defendants' code in approximately 8.5
6 hours.

7 43. Real-world shootings underscore how the digital files distributed online become
8 functional weapons. The release of a viral 3D-printed pistol design first released by Deterrence
9 Dispensed, the predecessor entity to Defendant the Gatalog Foundation, Inc., resulted in one of
10 the highest-profile ghost gun shootings to date⁸: in November 2024, UnitedHealthcare CEO Brian
11 Thompson was assassinated with a homemade firearm based on that design.⁹

12 44. Digital firearms code files also enable users to easily produce dangerous firearm
13 accessories that can be inserted into or used in conjunction with a 3D printed firearm. These
14 include, for example, machinegun conversion devices such as auto-sears (small devices that
15 modify a gun to fire automatically), large capacity magazines (ammunition feeding devices that
16 hold more than 10 rounds), silencers (devices or attachments that silence or dampen the sound of
17 a gunshot), and multi-burst trigger activators (devices that allow a firearm to discharge two or
18 more shorts in a burst). Indeed, these accessories are generally simple devices that are even more
19 straightforward to print and assemble than firearms.

20 45. These prohibited accessories pose a serious threat to public safety as they make
21 firearms even more dangerous and lethal by increasing the rate of fire, increasing the capacity to
22 inflict harm, and concealing the shooter. For example, the 3D printed firearm used to assassinate
23 UnitedHealthcare CEO Brian Thompson was outfitted with a 3D printed silencer. Prohibited
24 accessories have also often been used in mass shootings to cause a high number of casualties. For

25 ⁸ Corey Kilgannon, *Pistol Taken From Suspect Was a Fully Homemade Weapon, Officials*
26 *Say* (December 10, 2024) New York Times <<https://www.nytimes.com/2024/12/10/nyregion/uhc-killing-ghost-gun-3d-printing.html>> (as of Feb. 5, 2026).

27 ⁹ Andy Greenberg, *The 'Ghost Gun' Linked to Luigi Mangione Shows Just How Far 3D-*
28 *Printed Weapons Have Come* (December 10, 2024) WIRED <<https://www.wired.com/story/luigi-mangione-united-healthcare-3d-printed-gun-fmda-chairmanwon-v1/>> (as of Feb. 5, 2026).

1 example, the “bump stock” (a type of multi-burst trigger activator), which replaces a rifle’s
2 standard stock and allows a semi-automatic firearm to fire continuously like a machinegun,
3 gained infamy when it was used by a gunman who killed 60 people and injured hundreds more in
4 the 2017 Las Vegas music festival, the deadliest mass shooting in modern United States history.¹⁰
5 For these reasons, many dangerous accessories are illegal to manufacture or possess in California,
6 but users can now manufacture these lethal devices at home to evade detection.

7 46. The threat posed by 3D printed firearms and prohibited firearm accessories is
8 particularly acute in California. In July 2023, federal agents seized two 3D printers—one adorned
9 with swastikas—from the home of a San Fernando Valley man who was prohibited from owning
10 firearms due to a prior felony.¹¹ He had been using the printers to assemble fully automatic
11 weapons and had publicly called for the mass murder of Jewish people.¹²

12 47. In December 2023, a San Francisco resident pleaded guilty and was sentenced to six
13 years in prison for selling ghost guns out of his home to drug dealers and other criminals. Upon
14 arrest, he was found with several untraceable ghost guns, including fully automatic AR-15
15 machine guns, AK-47 parts, ammunition, two 3D printers, and a milling machine to drill metal
16 gun parts.¹³ Between 2022 and 2025, the SFPD recovered approximately 40 guns with 3D
17 printed components, including in connection with crimes involving drugs, assaults, thefts, and
18 criminal threats.

19
20
21 ¹⁰ Kalhan Rosenblat, *Las Vegas shooting is deadliest in modern U.S. history* (October 2,
22 2017) NBC News <<https://www.nbcnews.com/storyline/las-vegas-shooting/las-vegas-shooting-deadliest-modern-u-s-history-n806486>> (as of Feb. 5, 2026).

23 ¹¹ U.S. Department of Justice, *Reseda Man Affiliated with Violent White Supremacist*
24 *Group Charged in Federal Criminal Complaint with Drug and Ammunition Offenses* (July 28,
25 2023), <<https://www.justice.gov/usao-cdca/pr/reseda-man-affiliated-violent-white-supremacist-group-charged-federal-criminal>> (as of Feb. 5, 2026).

26 ¹² *Id.*
27 ¹³ Jonah Owen Lamb, *He beat addiction and homelessness to become an IT tech. Then he*
28 *started making ghost guns*, The San Francisco Standard (January 2, 2024)
<<https://sfstandard.com/2024/01/02/san-francisco-catalytic-coverter-theft-ghost-gun/>> (as of Feb. 5, 2026).

1 48. In February 2024, Santa Rosa Police arrested a 14-year-old boy—who would have
2 been too young to purchase a gun legally—for manufacturing firearms using a 3D printer.¹⁴ That
3 same month, San Jose Police investigating a triple shooting discovered a loaded, 3D printed
4 handgun in the home of the juvenile suspect.¹⁵

5 49. The exponential growth in the production of 3D printed guns and their use in crimes
6 across California point to an escalating public-safety threat and underscore the urgent need for
7 injunctive and declaratory relief sought herein.

8 **II. Defendants' Operations**

9 **A. Defendants' Online Presence**

10 50. Through several related websites and online profiles, Defendants maintain an internet
11 presence through which they distribute computer code and instructions for 3D printing over 130
12 different firearm models. Defendants make their code and instructions available for easy
13 download by anyone in California.

14 51. Defendants also distribute files for 3D printing prohibited firearm accessories. These
15 include, for example: auto-sears; large capacity magazines; silencers; and various accessories,
16 attachments, or devices that may be used to render a firearm an illegal assault weapon.¹⁶

17 52. Defendants sell merchandise, take donations, maintain affiliate links, and sell firearm
18 parts kits designed to complete 3D printed firearms.

20

21 ¹⁴ Tim Fang, *14-year-old Santa Rosa student accused of manufacturing firearms with 3D*
22 *printer*, CBS News (Feruary. 14, 2024) <<https://www.cbsnews.com/sanfrancisco/news/santa-rosa-14-year-old-montgomery-high-student-accused-manufacturing-firearms-3d-printer/>> (as of
23 Feb. 5, 2026).

24 ¹⁵ Aja Seldon, *2 alleged San Jose gang members arrested in triple shooting*, FOX KTVU
25 (February 29, 2024) <<https://www.ktvu.com/news/2-alleged-san-jose-gang-members-arrested-in-triple-shooting>> (as of Feb. 5, 2026).

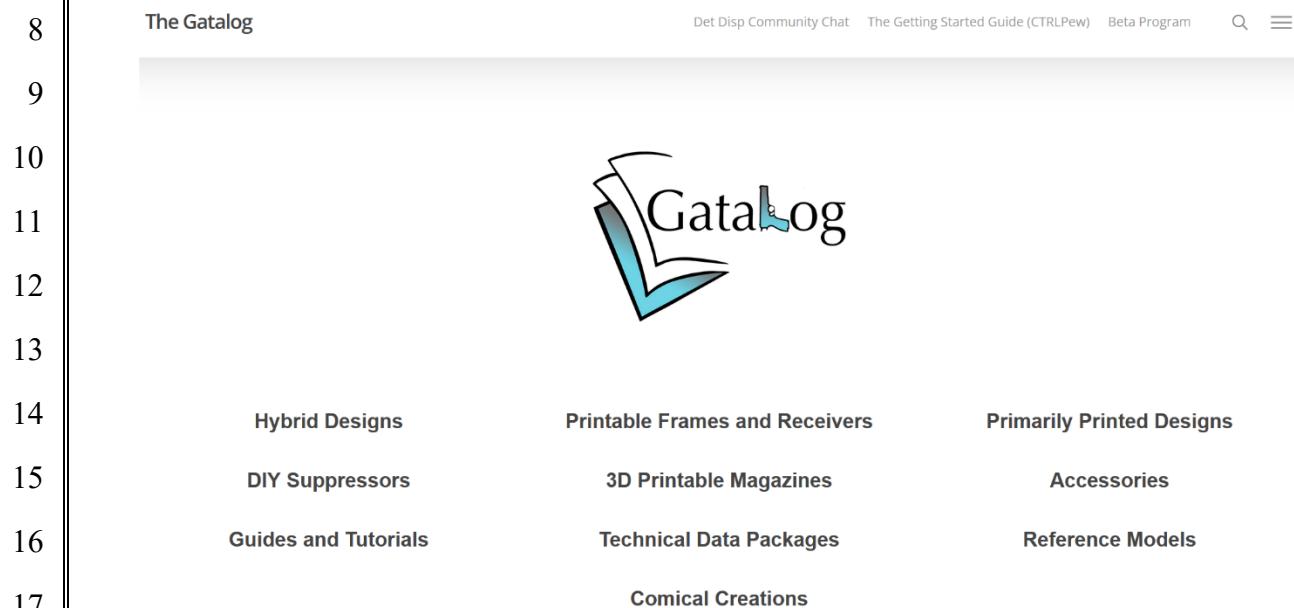
26 ¹⁶ Assault weapons are firearms that are semi-automatic and have specific features or
27 characteristics that make them more dangerous, including by increasing the rate of fire and
28 capacity for firepower. For example, California law restricts the use of a flash suppressor, which
muzzles the flash of a firearm and thus helps to conceal the shooter, as well as the use of a pistol
grip, handgrip, or forward grip, which increase the ability of the shooter to fire at a high rate.
(Pen. Code § 30515, subd. (a).)

1 **1. The Catalog Website**

2 53. Defendants maintain a website, <https://thegatalog.com>, called “The Catalog.”

3 54. The Catalog website is simple. The homepage contains a website header and ten
4 different links. Each link correlates to a category of files for 3D printing firearm-related items.
5 For example, “Printable Frames and Receivers,” relates to files for printing firearm frames and
6 receivers, and “3D Printable Magazines,” relates to files for 3D printing magazines.

7 55. Below is a snapshot of the Catalog homepage.



18 **2. The Catalog’s Odysee Profiles**

19 56. Each of the links on the Catalog homepage takes the user to a related profile on
20 Odysee. And, through these profiles, Defendants disseminate files for 3D printing firearms and
21 firearms accessories. Each of the links on the Catalog homepage takes the user to a
22 corresponding profile on Odysee. The names of the profiles are nearly the same as the links,
23 except with “The Catalog’s” in front of the title. For example, “Printable Frames and Receivers”
24 becomes “The Catalog’s Printable Frames and Receivers,” and “3D Printable Magazines”
25 becomes “The Catalog’s 3D Printable Magazines.”

1 57. The titles on the Catalog website and the corresponding Odysee Profile and URL on
2 Odysee are as follows:

<u>Link on Catalog's website:</u>	<u>Odysee profile:</u>
Hybrid Designs	The Catalog's Hybrid Designs
Printable Frames and Receivers	The Catalog's Printable Frames and Receivers
Primarily Printed Designs	The Catalog's Primarily Printed Designs
DIY Suppressors	The Catalog's DIY Suppressors
3D Printable Magazines	The Catalog's 3D Printable Magazines
Accessories	The Catalog's Accessories
Guides and Tutorials	The Catalog's Guides and Tutorials
Technical Data Packages	The Catalog's Technical Data Packages
Reference Models	The Catalog's Reference Models
Comical Creations	The Catalog's Comical Creations

15 58. The Odysee profiles contain code files and instructions for 3D printing over 150
16 designs of firearms and prohibited accessories.¹⁷

17 59. In addition to the shared profile name, each Odysee profile contains the Catalog logo.
18 And on each webpage where files are made available for download, the name of the design is
19 introduced with the logo and “The Catalog presents” and Defendants invite users to “Join the
20 community at thegatalog.com.” Snapshots of these aspects of the pages are shown below in
21 paragraphs 65 and 67 with respect to The Catalog’s Printable Frames and Receivers profile and
22 the FMDA DD19.2 3D Printable Glock Frame.

23 60. The files posted on the Odysee profiles are available for free and can be downloaded
24 by simply clicking a “download” button. Nothing on the file pages of the Odysee profiles
25 prevents downloads of the files from California. Nor is there anything on the file pages requiring

27 ¹⁷ The Odysee profiles also include files that contain only guides and tutorials or
28 additional technical information, including, for example, in The Catalog’s Guides and Tutorials
profile.

1 a user to demonstrate that he possesses valid state and federal manufacturers licenses. As set
2 forth more fully below, an analyst from the California Attorney General's Office was able to
3 download the files on the Odysee profiles from California without issue.

4 61. The files available for download on Odysee generally consist of individual zip
5 folders. For each firearm or accessory design, the zip folder contains computer-aided design
6 ("CAD") digital code for the design. Most zip folders also include instructions for using the CAD
7 files to print the design. These instructions often provide recommended materials and specific
8 print settings for a 3D printer to successfully print the design. Many of the zip folders also
9 contain detailed instructions for how to combine the 3D printed component with other parts
10 (whether store-bought or self-manufactured) to produce operational firearms or firearm
11 accessories.

12 62. Defendants strictly control the files disseminated through the Catalog website and the
13 associated Odysee profiles. While Defendants make available a "Beta Program" for users to
14 share and test their code files, they make clear that they will only distribute the final "single
15 released and proven package" of files "containing third-party verified models and documentation
16 containing thorough build details and instructions."¹⁸ Files must be approved by "Catalog
17 leadership" before they are made available on the Catalog Odysee profiles.¹⁹ Defendants make
18 clear that their goal is to ensure that only the final, verified files "live forever . . . [s]o when some
19 random completely disconnected . . . person finds the files they are able to construct them
20 successfully."²⁰

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24 ¹⁸ *The Beta Program*, The Catalog <<https://thegatalog.com/the-beta-program/>> (as of Feb.
25 5, 2026).

26 ¹⁹ *Product Development Lifecycle*, Deterrence Dispensed
27 <<https://gitlab.deterrencia.com/deterrence-dispensed/information-and-tutorials/-/wikis/For-Developers/Process-Management/Product-Development-Lifecycle>> (as of Feb. 5,
2026).

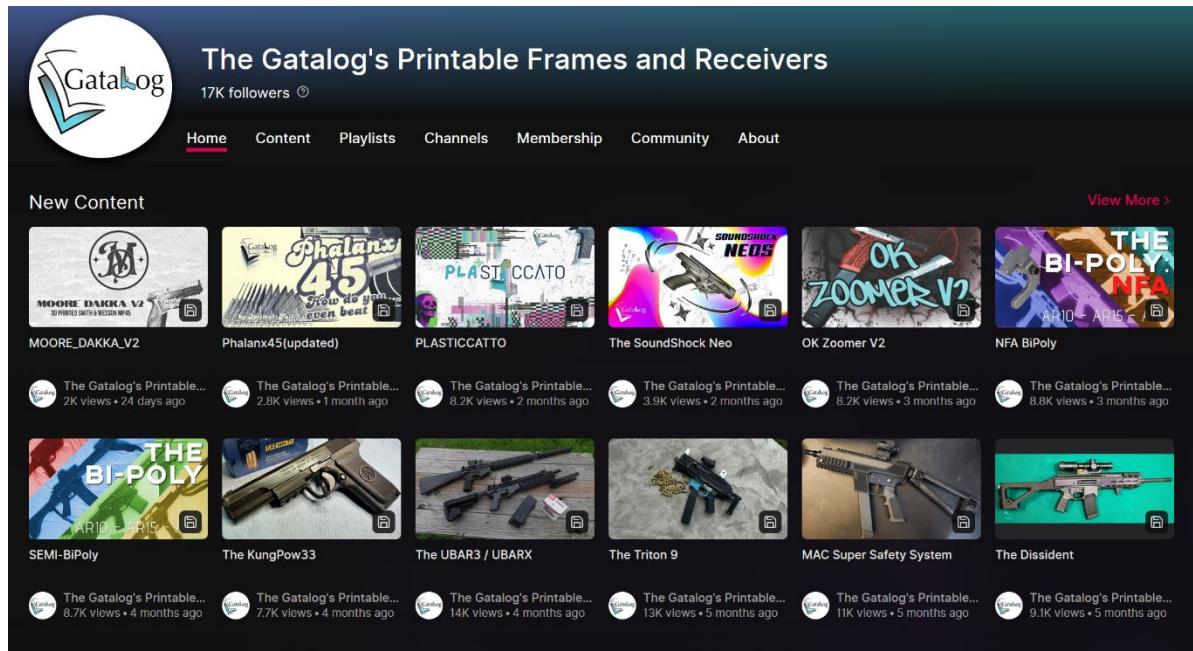
28 ²⁰ *Supra* n. 16.

1 **B. 3D Printed Firearm Files**

2 63. Through the Odysee profiles, Defendants disseminate files for manufacturing or
3 producing over 130 different models of 3D printed firearms. These include designs for various
4 semi-automatic handguns and rifles.

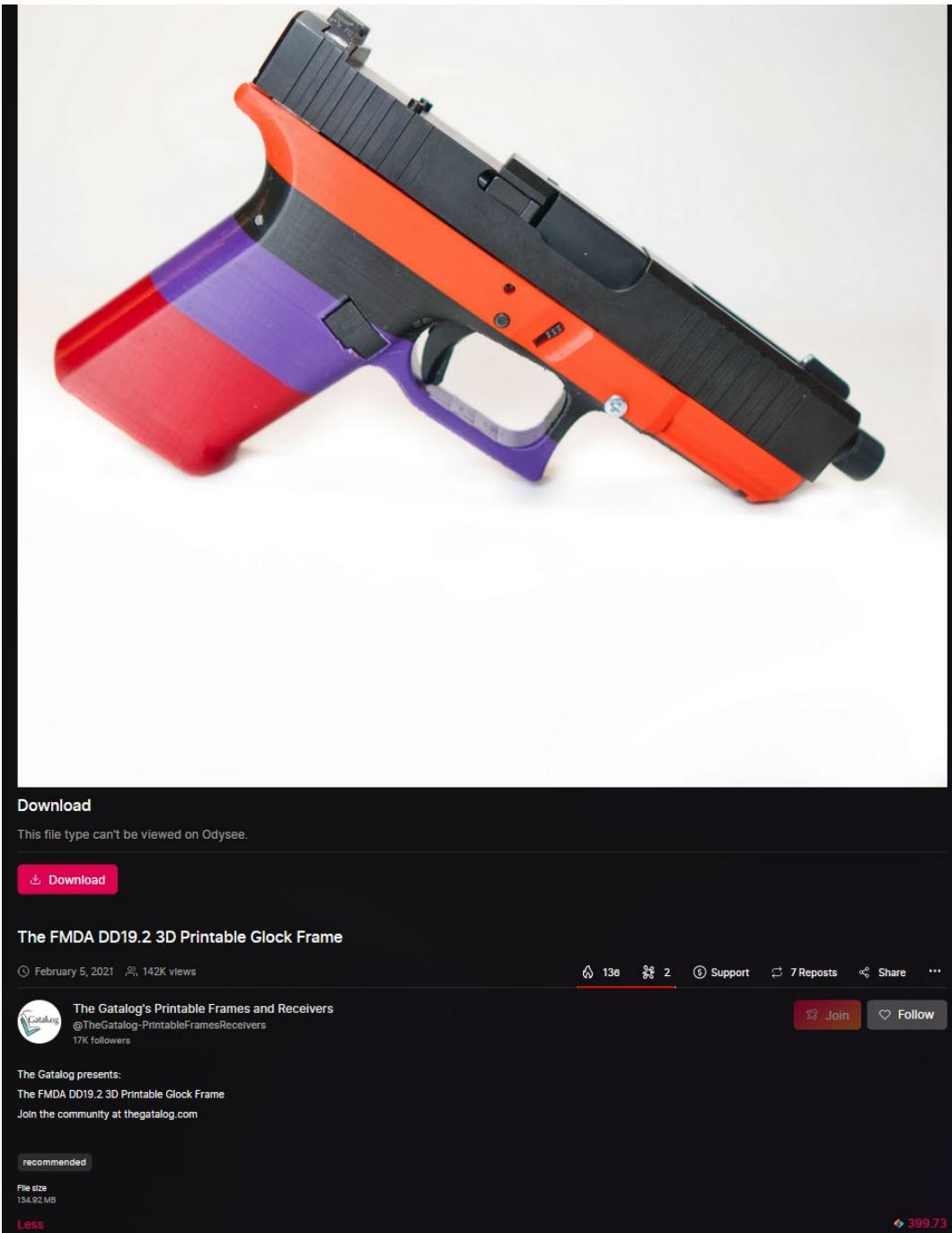
5 64. The vast majority of Defendants' 3D printed firearm models (over 115) are made
6 available through the Gatalog's Printable Frames and Receivers profile. The files distributed
7 through the Gatalog's Printable Frames and Receivers profile contain the digital code for frames
8 or receivers of firearms, and in many cases contain detailed instructions on how the 3D printed
9 components can be combined with other purchased parts (including those sold by Defendants) to
10 produce a functional weapon.

11 65. Below is a snapshot of The Gatalog's Printable Frames and Receivers page on
12 Odysee.



24 66. One of the printable frame designs distributed by Defendants is "The FMDA DD19.2
25 3D Printable Glock Frame." The FMDA DD 19.2 is a design based on a Glock 19 model
26 handgun. A version of the FMDA DD 19.2 was used in the killing of the United Healthcare CEO
27 in December 2024.

1 67. Below is a snapshot of the FMDA DD 19.2 posting on Catalog's Odysee profile.



2 68. The FMDA DD 19.2 design includes detailed instructions to make it easy for a user to
3 print and assemble the gun. The digital code is accompanied by a "README" file that
4 recommends the 3D printer settings that users should use, notes that the provided files "are
5 oriented and scaled properly," and warns users that they "MUST follow these print settings in
6 order to get the best possible results." The zip folder also comes with a detailed tutorial with a
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1 “shopping list” of other components and step-by-step instructions to combine the 3D printed
2 frame with other components in order to produce a functional Glock style handgun.

3 69. Another one of the printable frame or receiver designs is “The CAG19,” described as
4 a “California Compliant Glock 19-based Carbine kit.” As suggested by the name, this design is
5 specifically directed to California residents. The instructions state the design is legal in California
6 and that “[t]his project is aimed to provide Californians with the entire legal process to print and
7 assemble a California compliant Glock 19 carbine.” However, 3D printing such a firearm
8 without a manufacturer’s license is illegal under California law.

9 70. Several of Defendants’ Odysee profiles contain files for so-called “fully printed
10 projects,” which are firearms that are designed to have most of their parts produced through 3D
11 printing. These designs can be found in The Catalog’s Hybrid Designs and The Catalog’s
12 Primarily Printed Designs profiles, which together contain over 15 different designs. As with
13 printable frames and receivers, Defendants make available both the digital code for 3D printing
14 the firearm parts and provide instructions for assembling the firearm.

15 71. One of the Catalog’s Hybrid Designs is the FGC-9. FGC stands for “F*** Gun
16 Control” and the FGC-9 has been linked to violent criminals and extremists. As Defendants
17 claim on their CTRLPew website (discussed further below), “By owning an untraceable firearm
18 like the FGC9, individuals can have a veto power on par with their government” and “[b]ecome
19 [u]ngovernable.” The file includes not just the digital code to print the FGC-9 but also a detailed
20 110-page guide that provides recommended settings for slicer software, a timetable for how much
21 time each build is expected to take and how much material it will use, and step-by-step
22 instructions to combine the various printed components into the final product: a semi-automatic
23 firearm that is described as “the most effective and easiest to build homemade semi-automatic
24 firearm design for people with limited access to gunsmithing knowledge and tools.”

25 **C. 3D Printed Firearm Accessories**

26 72. Through several profiles, Defendants also make available firearms code files for over
27 a dozen different designs intended to produce prohibited firearm accessories, including auto-
28 sears, large capacity magazines, and silencers. These accessories can render a firearm more

1 dangerous and lethal by increasing the rate of fire, increasing the capacity to inflict harm, and
2 concealing the shooter, among other things.

3 73. Through The Gatalog's Accessories profile, Defendants' code files include several
4 designs for an auto-sear, which can be used to easily convert a handgun or rifle to fire
5 automatically as a machinegun. For example, the "Make Glocks Full Auto" Glock autosear" can
6 be used to print an auto-sear using the files provided by Defendants that can then be inserted into
7 certain Glock model handguns to convert them into a machinegun. As another example, the
8 "Yankee Boogle 3D Printable AR15 Full-Auto Mod (Swift Link)" can be used to convert
9 virtually any AR model semi-automatic rifle into a machinegun. The auto-sear files include the
10 digital code for printing the items as well as instructions for purchasing any additional parts and
11 installing the auto-sear into the firearm.

12 74. Below is a snapshot of a photograph on the "Make Glocks Full Auto Glock auto-sear"
13 Odysee page; the auto-sear is reflected in orange.



23 75. Through the Gatalog's 3D Printable Magazines profile, Defendants' code files also
24 include designs for large-capacity magazines that can be used for various model handguns and
25 rifles. For example, the "Menendez Magazine v2.0 Pack" disseminated by Defendants provides
26 files for various 3D printable 9mm Glock magazines, including a 17 round, 25 round, and 30
27 round magazine, which the instructions indicate can be used in Glock 17, 19, and 26 style
28 handguns. These magazine designs are attributed to IvanTheTroll, the alias of Defendant John

1 Elik. The large-capacity magazine files distributed by Defendants contain both files for 3D
2 printing the items and instructions for parts to purchase and how to assemble the magazine.

3 76. And through the Catalog's DIY Suppressors profile, Defendants' code files include
4 designs for silencers. For example, the "K-CAD 3D Printed Suppressor Pack V1.0" contains files
5 for silencers designed to fit numerous models of handguns or rifles. The silencer files posted by
6 Defendants contain both files for 3D printing the items and instructions for any additional parts to
7 purchase and how to assemble the silencer.

8 77. Below is a snapshot of a photograph on the "K-CAD 3D Printed Suppressor Pack
9 V1.0" Odysee page; the silencers are in the red boxes.



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18 **D. Defendants' Files Can Be Used to Produce Functional Firearms**

19 78. The files distributed by Defendants may be used to print and assemble a fully
20 functional firearm.

21 79. On June 17, 2024, an analyst of the California Attorney General's Office went online
22 with a California-based IP address and visited each of the linked Catalog profiles on Odysee
23 available from the homepage. The analyst was able to download all files available from each of
24 the Odysee profiles, which included over 200 different files. On March 6, 2025, the analyst
25 returned to the Catalog website and Odysee profiles and downloaded files for new designs that
26 had been posted since the previous download. On January 7, 2026, the analyst returned to the
27 Catalog website and Odysee profiles and again downloaded all of the files available from each of
28

1 the Odysee profiles, which included over 240 files, including files for over 150 firearm and
2 prohibited firearm accessory designs.

3 80. Using one of the files—the “FMDA DD 19.2”—the People 3D printed and assembled
4 a functional firearm. By utilizing the digital code and following the step-by-step instructions
5 accompanying the code and other recommendations in the Gatalog files—including using the
6 recommended filament, 3D printer model, and print parameters—the People printed three frames.
7 Each print took approximately 7.5 hours.

8 81. As printed, each frame constitutes a firearm precursor part regulated under California
9 law, including Civil Code sections 3273.61 and 3273.625.

10 82. A special agent supervisor at the California Department of Justice, Bureau of
11 Firearms, then assembled one of the 3D printed frames with other commonly available firearm
12 parts to produce an operational firearm. To do so, he followed the assembly instructions that
13 accompanied the digital code, which detailed which parts to purchase and what tools to use. The
14 assembly process took one hour.

15 83. Thus, in 8.5 hours—about a business day—Defendants’ digital code and
16 accompanying instructions may be used to produce an unserialized ghost gun.

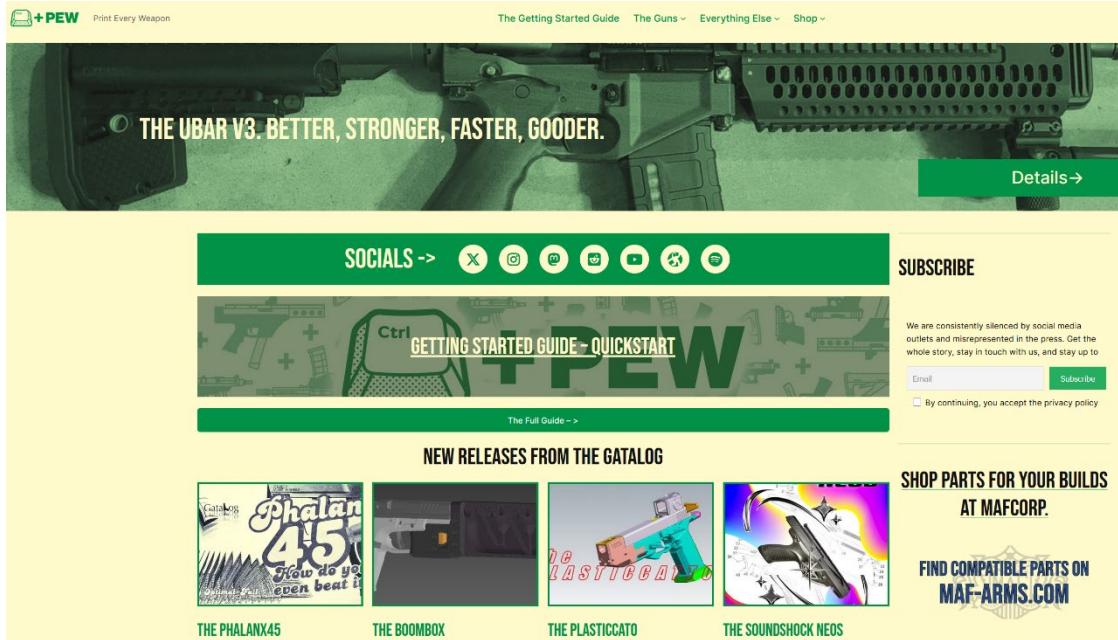
17 **E. The CTRLPew Website**

18 84. Defendants maintain another website, ctrlpew.com, that complements and expands
19 upon the Gatalog’s illegal distribution of firearm manufacturing code. The corporate entity
20 CTRLPew LLC (“CTRLPew”) was formed in 2020 by Defendant Holladay. The name
21 CTRLPew stands for 3D printing weapons: “ctrl” refers to the keyboard key and “Pew” stands
22 for “Print Every Weapon.” The Gatalog website links to the CTRLPew website.

23 85. The CTRLPew website in turn links to the 3D printing files for firearms and
24 accessories available for download on the Gatalog Odysee profiles. The home page invites users
25 to “Browse All The Gatalog Releases” and includes a search function to “Search The Gatalog.”
26 Users can also access the files through a section called “File Drops.” The files are divided into
27 seven “post categories” that correspond to names of the Odysee profiles: Accessories, Comical
28 Creations, Guides, Hybrid, Magazine, Primarily Printed, Printable Frames, and Suppressor. The

1 files may also be tagged based on various features, including, for example, the type of firearm
2 (e.g., 9 mm, AR15) and the gun developer. Each of the 3D printing file pages attributes the
3 firearm or accessory design to its developer.

4 86. A snapshot of the CTRLPew homepage appears below.



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15 87. Once on a “file drop” page, a user simply needs to click a green button that says
16 “Download Here” or “Download from the Gatalog” and they are taken to the corresponding
17 download page on Odysee (discussed above).

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28 88. Through the CTRLPew website, Defendants disseminate guides and tutorials for 3D printing firearms and firearm accessories and various blog posts and articles about the same. “Getting Started Guide 0 – How to Start 3D Printing Quickly” walks the user through setting up the capability to 3D print and provides recommendations for 3D printers, filaments, slicer software, slicer settings, the files themselves, and firearm parts kits. In particular, the guide directs users to The Gatalog for the 3D printing files, linking to the “File Drops” section of the CTRLPew site and to The Gatalog website. Defendants also state that Gatalog files “are the only releases” that will be covered on the CTRLPew site “in any detail.”

89. Through the CTRLPew website, Defendants sell merchandise, solicit donations for gun developers, and earn commissions through affiliate links to various 3D printing equipment,

1 material, and other items. Defendants Holladay, Larosiere, and Elik each have their own pages
2 for receiving donations through the CTRLPew website.

3 90. Defendants also profit from the distribution of digital firearms code in other ways. In
4 particular, Defendants Larosiere and Holladay operate another company—MAF Corp.—that sells
5 parts kits specifically designed to complete the firearms printed using the Catalog’s digital
6 firearms code. The CTRLPew website directs users to MAF Corp. and often provides a discount
7 code to purchase firearms kits. MAF Corp. is also featured in the Getting Started Guide, as well
8 as on individual design pages, as a “preferred part vendor[.]”²¹ The instruction manuals that
9 accompany many of Defendants’ digital code files also recommend purchasing parts from MAF
10 Corp. in order to complete the firearm build.

11 91. CTRLPew directs its services to California residents, and Defendants are aware of
12 firearms laws, including California law, that regulate 3D printing of firearms. CTRLPew sells
13 merchandise directed to California residents, including a “warning” sticker in the form of a
14 yellow hazard triangle sign that states, “Not for Making Guns.” The product posting mocks
15 California law concerning the sale of 3D printers for manufacturing firearms: “This sticker is
16 especially timely given the introduced California legislation (AB-1089) that prohibits the sale,
17 offer for sale, or transfer of a CNC milling machine or 3D printer with the sole or primary
18 function of manufacturing firearms to anyone in the state. So not only will you be making a
19 statement about safety and responsibility, but you’ll also be ‘showing your support’ for sensible
20 firearm regulations.” CTRLPew also sells a sticker “10 rounds only” that mocks California’s
21 restriction on large capacity magazines. In addition, The CTRLPew terms of service instruct
22 “California Users and Residents” to resolve complaints by contacting the California Department
23 of Consumer Affairs.

24 92. The stated purpose of Defendants’ operations is to circumvent firearms regulations.
25 CTRLPew sells merchandise stating, “Go and make it. Print one of everything. Laugh on the
26 grave of gun control” and “F*** Gun Control.” One of the firearm models developed by an

27 21 See, e.g., *File Drop: The MacDaddy V2.0*, CTRLPew <<https://ctrlpew.com/file-drop-the-macdaddy-v2-0/>> (as of Feb. 5, 2026).

1 affiliate of Gatalog (and currently distributed through the Gatalog Odysee profiles) is called the
2 FGC-9, which stands for “F*** Gun Control.”

3 **F. The Individual Defendants’ Activities**

4 93. The individual defendants are principals in the corporate entities associated with
5 Defendants’ activities. They also actively contribute to those activities by developing their own
6 digital firearm manufacturing code and making it available for download on Gatalog’s Odysee
7 Profiles.

8 94. Defendant Holladay is the Treasurer of Gatalog and the Manager of CTRLPew. He
9 develops his own designs for 3D printed firearms and firearm accessories, using the handle
10 “@ctrlpew.” Posts for his designs are available on CTRLPew’s website under that handle, with
11 links to the files available on the Gatalog Odysee profiles. Defendant Holladay has six designs
12 posted on CTRLPew and available for download on Odysee, including two frames/receivers and
13 a silencer.

14 95. Defendant Larosiere is the President and Registered Agent of Gatalog. He also
15 develops his own designs for 3D printed firearms, using the handle “Fuddbusters” or his name,
16 “Matt Larosiere.” There are two printable frame/receiver designs attributed to Defendant
17 Larosiere on CTRLPew, with linked files available for download on the Gatalog Odysee profiles.

18 96. Defendant Elik is the Director of Gatalog. He also develops his own designs for 3D
19 printed firearms and firearm accessories, using the alias “IvanTheTroll.” There are over 20
20 designs attributable to IvanTheTroll on CTRLPew, with linked files available for download on
21 the Gatalog Odysee profiles. These include designs for over 15 frames/receivers and several
22 large-capacity magazines.

23 **CAUSES OF ACTION**

24 **FIRST CAUSE OF ACTION**

25 **VIOLATION OF CIVIL CODE SECTION 3273.61**

26 **AGAINST ALL DEFENDANTS**

27 97. The People reallege and incorporate by reference each of the paragraphs above as
28 fully set forth herein.

98. Under Civil Code section 3273.61(a)(1), a civil action may be brought against "a person who knowingly . . . distributes or causes to be distributed, by any means including the internet, any digital firearm manufacturing code to any other person in this state who is not a federally licensed firearms manufacturer, member of the Armed Forces of the United States or the National Guard, while on duty and acting within the scope and course of employment, or any law enforcement agency or forensic laboratory."

99. Defendants have violated and continue to violate Civil Code section 3273.61(a)(1) by knowingly distributing or causing to be distributed over the internet digital firearm manufacturing code to persons who are not exempt from receiving such code under the statute.

SECOND CAUSE OF ACTION

VIOLATION OF CIVIL CODE SECTION 3273.625

AGAINST ALL DEFENDANTS

100. The People reallege and incorporate by reference each of the paragraphs above as fully set forth herein.

101. Under Civil Code section 3273.625, a civil action may be brought against a person who “knowingly, willfully, or recklessly cause[s] another person to engage in the unlawful manufacture of firearms,” or who “knowingly, willfully, or recklessly aid[s], abet[s], promote[s], or facilitate[s] the unlawful manufacture of firearms.”

102. Defendants have violated and continue to violate Civil Code section 3273.625 by knowingly, willfully, or recklessly causing another person to engage in the unlawful manufacture of firearms, and/or by knowingly, willfully, or recklessly aiding, abetting, promoting, or facilitating the unlawful manufacture of firearms.

THIRD CAUSE OF ACTION

VIOLATION OF BUSINESS AND PROFESSIONS CODE SECTION 17200 ET SEQ.

AGAINST ALL DEFENDANTS

103. The People reallege and incorporate by reference each of the paragraphs above as fully set forth herein.

104. The UCL prohibits any person from engaging in “any unlawful, unfair, or fraudulent business act or practice.” (Bus. & Prof. Code § 17200.)

105. Defendants have engaged, and continue to engage, in acts or practices that are unlawful and which constitute unfair competition within the meaning of the UCL. Defendants' unlawful, unfair, or fraudulent acts and practices in violation of the UCL include, but are not limited to, the following:

- a. Defendants have violated Civil Code section 3273.61(a)(1) as alleged in the First Cause of Action by distributing or causing to be distributed digital firearm manufacturing code to persons in California who are not licensed firearms manufacturers, members of the Armed Forces of the United States or National Guard acting within the scope and course of employment, or any law enforcement agency or forensic laboratory;
- b. Defendants have violated Civil Code section 3273.625 as alleged in the Second Cause of Action by aiding, abetting, promoting or facilitating the unlawful manufacture of firearms by making code available to Californians for unlawful firearm manufacturing on 3D printers.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

1. That under Civil Code section 3273.61(c) Defendants, their successors, agents, representatives, employees, assigns, and all persons who act in concert with them be enjoined in a manner sufficient to prevent any Defendant from further violating the law, including preliminary and permanent injunctive relief;

2. That under Civil Code section 3273.625(c) Defendants, their successors, agents, representatives, employees, assigns, and all persons who act in concert with them be enjoined in a manner sufficient to prevent any Defendant from further violating the law, including preliminary and permanent injunctive relief;

3. That under Business and Professions Code section 17203, Defendants, their successors, agents, representatives, employees, assigns, and all persons who act in concert with

1 them be permanently enjoined from committing any acts of unfair competition in violation of
2 Business and Professions Code section 17200, including but not limited to the acts and practices
3 alleged in this Complaint;

4 4. That the Court make such orders or judgments as may be necessary, including for
5 preliminary injunctive and ancillary relief, to prevent the use or employment by any Defendant of
6 any practice which constitutes unfair competition, or which may be necessary to restore to any
7 person in interest any money or property, real or personal, which may have been acquired by
8 means of such unfair competition, under the authority of Business and Professions Code section
9 17203;

10 5. That the Court assess a civil penalty of \$25,000 against each Defendant for each
11 violation of Civil Code section 3273.61(a)(1);

12 6. That the Court assess a civil penalty of \$25,000 against each Defendant for each
13 violation of Civil Code section 3273.625(a);

14 7. That the Court assess a civil penalty of \$2,500 against each Defendant for each
15 violation of Business and Professions Code section 17200 in an amount according to proof, under
16 the authority of Business and Professions Code section 17206;

17 8. That the Court award the remedy of disgorgement in an amount according to proof,
18 under the authority of Government Code section 12527.6;

19 9. That the People recover their costs of suit;

20 10. That the People receive all other relief to which they are legally entitled; and

21 11. For such other and further relief that the Court deems just and proper.

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Respectfully submitted,

Dated: February 6, 2026

ROB BONTA
Attorney General of California

By: /s/ Vesna Cuk
VESNA CUK
Deputy Attorney General

Dated: February 6, 2026

DAVID CHIU
City Attorney of San Francisco

By: /s/ Karun A. Tilak
KARUN A. TILAK
Deputy City Attorney

*Attorneys for Plaintiff
The People of the State of California*