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Jennifer Davenport, Attorney General of the
STATE OF NEW JERSEY,

Plaintiff,

v.

Jordan Vinroe,

Defendant.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION –
MERCER COUNTY

DOCKET NO.: _____

Civil Action

COMPLAINT

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The New Jersey Attorney General, by and through undersigned counsel, hereby alleges as follows against Defendant Jordan Vinroe:

INTRODUCTION

1. The Attorney General brings this action to hold Defendant Jordan Vinroe accountable for his years-long and unlawful efforts to sell New Jersey residents kits, parts, and other products to create unserialized, untraceable firearms—commonly known as “Ghost Guns.” This action against Vinroe is for his personal, intentional, and unlawful conduct.

2. Vinroe has sought to sell Ghost Gun kits and parts into New Jersey through at least six different business lines that he has founded, owned, and operated:

- a. JSD Supply (“JSD”), at one time the self-proclaimed nation’s largest retailer of Ghost Gun handgun frames. Until May 7, 2026, when Vinroe put his holding company for the JSD business into bankruptcy, JSD sold large numbers of Ghost Gun handgun frames, alone or in kits, as well as other parts to make Ghost Guns or to enhance their lethality.
- b. Eagle Shows (“Eagle”), a Pennsylvania-based gun show operator. On May 7, 2026, Vinroe also put his holding company for the Eagle business into bankruptcy, and claimed an end to Eagle’s operations – even though those gun shows still continue uninterrupted.
- c. Eastern Gun Expo, an ostensibly new Pennsylvania-based gun show operator that Vinroe, upon information and belief, controls, that now operates the very same gun shows formerly operated by Eagle.
- d. Patmos Arms, a line of Ghost Gun completion products which Vinroe manufactured and sold through JSD.
- e. Gideon Optics, a firearm scopes products line business conducted, directed and managed by Vinroe.
- f. PR Triggers, which makes “pull-release” triggers, which fire a shot on the pull and the release of a trigger, thus qualifying the gun as an illegal machine gun under New Jersey law.

3. Vinroe’s JSD business was the centerpiece of his retail and manufacturing activities. Vinroe initially launched JSD in 2013 as a sole proprietorship. In February 2021, after achieving massive growth, Vinroe created a separate legal business entity for the JSD business.

But that changed little in practice. Vinroe was the entity's sole member and sole manager. He repeatedly moved large amounts of money among his personal checking accounts and JSD's entity accounts. And he continued to personally manage and transact the day-to-day JSD business.

4. In selling JSD products, Vinroe and those selling Ghost Gun kits and parts under his direction did not conduct background checks or require buyers to demonstrate that they were not disqualified from purchasing or possessing a firearm. Vinroe and his agents deliberately processed sales in all-cash transactions that left little or no purchase record. As JSD stated on its website in August 2022: "JSD was founded in a love of guns and hate of paperwork. Since 2013, we've helped thousands of people build their own gun from the privacy of their garage. No serialization, ***no background check***, no government fee."¹

5. Vinroe made his in-person sales at gun shows operated by Eagle. In 2021, when Eagle's then owner began to restrict Ghost Gun product sales, Vinroe responded by acquiring Eagle and making its shows overtly pro-Ghost Gun.² Thereafter, Vinroe ran JSD, Eagle, and other Vinroe brands as an integrated and synergistic enterprise.

6. Vinroe knew that Ghost Guns have long been illegal in New Jersey. In 2018, building upon New Jersey's longstanding prohibitions against defacing serial numbers, New Jersey enacted a statute making it a crime to purchase kits and frames to make Ghost Guns. N.J.S.A. 2C:39-9(k). In 2019, New Jersey enacted a law make it a crime to possess or sell completed Ghost Guns. N.J.S.A. 2C:39-3(n), 2C:39-9(n). And, since July 2022, any person who

¹ JSD Supply, About JSD Supply, <https://web.archive.org/web/20220808020500/https://jsdsupply.com/about-us> (archived Aug. 8, 2022)(citation modified).

² Vinroe registered the Eagle business as Patriot Enterprises Worldwide LLC d/b/a Eagle Shows.

causes public harm in New Jersey by violating such laws, or who fails to institute statutorily-defined controls on the sale of firearm products, is civilly liable to the State. N.J.S.A. 2C:58-35.

7. Rather than heed these statutory prohibitions, Vinroe deliberately sought to capitalize on them. As he explained in an October 2020 interview: “What’s really good [for Ghost Gun product sales] is when you get closer to places that are very restrictive, so a *New Jersey*, a New York, a California, Washington State. Anywhere where their gun laws are very strict, is where you see people wanting products the most.”³

8. Once he took control of Eagle, Vinroe arranged regularly scheduled gun shows just across the New Jersey-Pennsylvania border, advertised those shows on New Jersey roadway billboards, and posted an article on the Eagle website that explained to New Jersey resident-visitors that, although kits to make Ghost Guns were illegal in New Jersey, they could be purchased at his gun shows. In response, New Jersey customers came to his gun shows in large numbers, and Vinroe sold them products to make large numbers of Ghost Guns.

9. Vinroe’s deliberate refusal to implement point-of-sale controls enabled people convicted of serious or dangerous crimes, convicted sex offenders, minors, people subject to domestic violence restraining orders, and others who cannot legally own, possess, or purchase a gun—as well as traffickers of illegal guns—to easily and covertly acquire lethal weapons. Because the products were specifically designed so that anyone with cash, a household drill, and an online video could quickly assemble them into functional firearms, people who were legally barred from acquiring any firearm could readily obtain a Ghost Gun without leaving any paper trail.

³ Is It Local, Ep. 10 | Jordan Vinroe - JSD Supply, at 15:06–15:32 (YouTube, Oct. 9, 2020), <https://www.youtube.com/watch?v=zePZxR9uFIo> [hereinafter “Is It Local Interview”]. All quoted language in this Complaint is quoted in relevant part (citation modified).

10. Largely because of Vinroe, Ghost Guns became a readily available weapon of choice for New Jersey’s gun traffickers and individuals convicted of serious or dangerous crimes. New Jersey’s State Commission of Investigation has reported that Ghost Gun recoveries in New Jersey increased eight-fold between 2019 and the 2022 high-water mark of 433 recoveries. Subsequent data shows recoveries averaging 251 annually in 2023, 2024, and 2025.

11. Vinroe’s unlawful conduct created a lucrative, big business, from which he extracted millions of dollars in personal profit.

12. To stop this conduct and abate its harms, in December 2023, the Attorney General sued the holding companies for two of Vinroe’s businesses—JSD and Eagle—for their corporate conduct in causing New Jersey’s Ghost Guns nuisance.⁴

13. On May 7, 2026, however, shortly after the Attorney General moved for litigation sanctions in that lawsuit, Vinroe filed bankruptcy petitions for both companies, contending they were broke. The extensive harm that Vinroe personally caused the residents of New Jersey therefore still remains unremedied.

14. Despite filing for bankruptcy, Vinroe still appears to be continuing the exact same gun show business, albeit under a different name: “Eastern Gun Expo.” The same gun shows—in the same locations, on the same schedule, even using the same phone number—continue forward unabated. It appears Vinroe merely changed the name of the gun show operator.

15. It is now clear that Vinroe’s filing for bankruptcy protection for two of his corporate entities has not marked the end of his unlawful conduct. It simply marks a diversionary tactic

⁴ Davenport v. Patriot Enterprises Worldwide, LLC d/b/a Eagle Shows and Not an LLC d/b/a JSD Supply, No. MER-C-93-23 (N.J. Sup. Ct. Ch. Div. Dec. 12, 2023).

designed to escape the consequences of his past improper conduct, while he continues the same unlawful conduct through alternate means.

16. Vinroe has knowingly and repeatedly violated New Jersey law and jeopardized the health and safety of New Jerseyans. The Attorney General now brings this action to stop and remedy Vinroe's unlawful and dangerous activity—and the threat it poses to the safety of all New Jerseyans.

PARTIES

17. Plaintiff is the Attorney General of the State of New Jersey. The Attorney General is authorized and charged with the responsibility to enforce N.J.S.A. 2C:58-35 ("Section 58-35"). The Attorney General brings the claims under Section 58-35 by and through the Statewide Affirmative Firearms Enforcement Office ("SAFE"). SAFE was created within the Office of the Attorney General by Attorney General Administrative Executive Directive No. 2022-08, which also delegates to SAFE the Attorney General's statutory authority under Section 58-35. The Attorney General also asserts in this case the State's proprietary interest and, under the Attorney General's parens patriae authority, New Jersey's "quasi-sovereign" interests in protecting the safety, health, and welfare of its residents.

18. Defendant Jordan Vinroe is a natural person who, upon information and belief, resides in Pennsylvania.

19. From 2013 until approximately February 2021, Vinroe operated the JSD Supply business as an unincorporated sole proprietorship. In September 2014, Vinroe registered "JSD Supply" as an official fictitious name for that sole proprietorship.

20. In February 2021, Vinroe registered Not An LLC, a Pennsylvania limited liability company with a principal address and registered office at 1051 New Castle Road, Prospect, PA 16052. Vinroe is the President of Not An LLC and its sole registered corporate officer.

21. In July 2021, Vinroe re-registered “JSD Supply” as an official fictitious business name owned both by himself and by Not An LLC. In September 2023, Vinroe filed a declaration stating “I am the sole member and manager of Not An LLC, doing business as JSD Supply, a Pennsylvania limited liability company.”

22. On May 7, 2026, Not An LLC filed for bankruptcy, and JSD’s website stated that JSD was “closing its doors.”

23. All references herein to “JSD” or “JSD Supply” refer to the business operated by Vinroe under that brand name, whether as a sole proprietor or as the President and sole manager of Not An LLC.

24. Vinroe personally conducted, directed and/or managed all JSD Supply business operations, from the launch of that business in 2013 until he filed a bankruptcy petition for Not An LLC on May 7, 2026.

25. In October 2021, Vinroe registered Patriot Enterprises Worldwide LLC, a Pennsylvania limited liability company with a registered office at 1051 New Castle Road, Prospect, PA 16052, the same address as Not An LLC. Vinroe is Patriot Enterprises Worldwide LLC’s registered President and sole registered corporate officer. The fictitious name “Eagle Shows” is registered as a Pennsylvania business with a principal address of 106 Poplar Lane, Portersville, PA 16051.

26. Vinroe used Patriot Enterprises Worldwide LLC to operate the Eagle Shows gun show business, which Vinroe acquired in approximately December 2021. Following Vinroe’s acquisition, Eagle described itself as the “home of the largest gun shows in the Keystone St⁵.”

⁵ Eagle Shows, Pennsylvania's Largest Gun Shows, <https://web.archive.org/web/20231130073132/https://eagleshows.com/> (archived Dec. 30, 2023).

27. On May 7, 2026, Vinroe filed a bankruptcy petition for Patriot Enterprises Worldwide LLC.

28. Vinroe personally conducted, directed, or managed all Patriot Enterprises Worldwide LLC and Eagle business operations, beginning with Vinroe's acquisition of the Eagle gun show business, and continuing until he put Patriot Enterprise Worldwide LLC into bankruptcy.

29. Vinroe's gun show business, previously operated as "Eagle Shows," now continues as "Eastern Gun Expo." Upon information and belief, this is personal business activity by Vinroe as a sole proprietor that is not organized under any existing business entity.

30. Upon information and belief, Vinroe's Patmos Arms business continues to sell Ghost Gun completion products. It does not appear to be organized under a formal, registered business entity.

31. Upon information and belief, Vinroe's Gideon Optics business continues to sell scopes for Ghost Guns. It appears to be associated with a Vinroe-run LLC registered in 2023.

32. Upon information and belief, Vinroe's PR Triggers business continues to sell triggers that allow handguns to operate as illegal machine guns. It appears to be associated with a different Vinroe-run LLC registered in 2023.

33. All claims asserted herein are direct claims against Vinroe based upon his personal conduct as alleged herein, which includes acting as day-to-day operator, manager, and conductor of the JSD Supply, Eagle (beginning approximately December 2021), Eastern Gun Expo, Patmos Arms, Gideon Optics, and PR Triggers businesses. Vinroe personally directed, performed, supervised, participated in, and otherwise caused all the acts alleged herein.

34. Vinroe is liable for his personal illegal or tortious conduct, whether related to unorganized, sole proprietor business activity or related to the business activities of organized entities such as Patriot Enterprises Worldwide LLC or Not An LLC.

JURISDICTION AND VENUE

35. This Court's jurisdiction is proper because the action arises from Vinroe's deliberate targeting of New Jersey residents and his regular, repeated, and systematic contacts with New Jersey. Vinroe has engaged in intentional acts calculated to create an actionable event in New Jersey, and could reasonably anticipate being haled into court in New Jersey as a result thereof.

36. Vinroe has deliberately solicited New Jersey residents for their business, and has knowingly sold Ghost Gun products to New Jersey residents, who foreseeably return with them to New Jersey. For example, Vinroe has placed billboard advertisements in New Jersey targeting New Jersey residents, has put up a webpage specifically directed at New Jersey residents, and has sent solicitation emails to known New Jersey residents who have provided their physical and email addresses to him and his companies.

37. Consistent with his longstanding, intentional targeting of the New Jersey customer market, upon acquiring the Eagle gun show business and for years regularly thereafter, Vinroe contracted to advertise gun shows close to New Jersey on billboards on New Jersey roadways, including the New Jersey Turnpike.

38. One frequent billboard location was above South Crescent Boulevard in Pennsauken, NJ, which funnels to the Admiral Wilson Boulevard approach to the Ben Franklin Bridge between Camden and Philadelphia. One New Jersey resident with a prior conviction that disqualified him from gun ownership testified that he personally purchased five kits to make Ghost Guns at Vinroe's March 2022 Eagle gun show in Allentown, PA, a show that he attended specifically because he saw Vinroe advertise it on a billboard "right on Admiral Wilson Boulevard,

Route 30, in Camden. You can see it as you're driving towards the Ben Franklin Bridge.”⁶ He further testified that, “a couple months before that,” he had attended a gun show at the same Allentown location because his father had seen it advertised on a billboard in “the same place.”⁷ Indeed, Vinroe held an Eagle gun show in Allentown on January 15-16, 2022, approximately one month after Vinroe took full control of Eagle.

39. Photographs show that Vinroe also advertised, on that same billboard in New Jersey, his Eagle gun shows at the Greater Philadelphia Expo Center, including for example in March / April 2023 and October 2023:



⁶ Deposition of Jesus Rivera, April 24, 2024, at 42:18–22, Ex. A to May 3, 2024, Letter in Davenport v. Patriot Enterprises, et al., N.J. Super. Ct. Ch. Div, MER-C-93-23 (Transaction ID No. CHC2024140703).

⁷ Id. at 42:3–14.



40. Another regular location for Vinroe's advertisements has been an electronic billboard at milepost 70.2 of the New Jersey Turnpike. Photographs show Vinroe's promotion there of numerous Eagle gun shows that he held at the Greater Philadelphia Expo Center. For example:

a. August 2023:



b. October 2023:



c. August 2024:



d. October 2024:



e. December 2025:



41. Vinroe has admitted that he deliberately makes sales near the New Jersey border because New Jersey is a jurisdiction “where you see people wanting [Ghost Gun] products the most.”⁸

⁸ Is It Local Interview, at 15:06.

42. Through his targeted solicitation of New Jersey residents, Vinroe has purposely availed himself of this New Jersey forum and accordingly had fair warning that his activities could subject him to New Jersey courts' jurisdiction.

43. Pursuant to R. 4:3-2(a)(2) of the New Jersey Court Rules, venue is proper in this Court because the causes of action alleged herein arose in Mercer County, a place to which Vinroe's Ghost Gun products were repeatedly transported.

FACTS

I. Vinroe's Ghost Gun Products

A. Federal and State Law Rules for Gun Sales and Prohibitions on Ghost Guns

44. Vinroe markets and sells Ghost Gun frames, kits and parts in the context of the federal rules for selling firearms.

45. Across the nation, commercial firearms dealers may only sell guns that have serial numbers on their frames. They must conduct background checks on purchasers and obtain detailed paperwork from purchasers. Commercial dealers must also keep detailed records about their acquisition and disposition of firearms. New Jersey and other states impose similar requirements as a matter of state law.

46. To prevent evasion of these important laws, federal law applies them in full force to the sale of a firearm's central constituent part: its frame. Generally speaking, a frame is the part of a handgun that houses internal components, such as the firing mechanism. A receiver is the analogous part of a rifle. The terms are sometimes used interchangeably and, unless otherwise noted, the use of the term "frame" in this Complaint encompasses a "receiver," and vice versa. Frames and receivers are sometimes also referred to as a firearm's "lower."

47. Conversely, firearms traffickers, persons who are prohibited by law from acquiring a firearm, and persons who want a gun to aid in the commission of other crime often seek to evade these requirements.

48. For this and other reasons, there is a strong market for Ghost Guns, i.e., firearms that lack a serial number on their frame or receiver. In particular, there is a strong illicit interest in being able to acquire Ghost Guns—or kits and frames and parts to make Ghost Guns—through sellers who do not require paperwork, do not conduct background checks, do not keep purchaser records, and avoid the creation of transaction records.

49. Thus, in New Jersey, it is a crime to sell a Ghost Gun. N.J.S.A. 2C:39-9(n). It is a crime to knowingly possess a Ghost Gun. N.J.S.A. 2C:39-3(n). It is a crime to purchase an unserialized frame (i.e., a “Ghost Gun Frame”) or “any combination of parts from which a [Ghost Gun] can be readily assembled.” N.J.S.A. 2C:39-9(k). And it is a crime to possess a firearm with a defaced serial number. N.J.S.A. 2C:39-3(d).

50. These laws reflect law enforcement and regulatory authorities’ strong interest in requiring firearms serialization and tracing, recordkeeping, and background checks. Those requirements aid in interdicting and investigating gun crime, preventing purchases by firearms traffickers and other dangerous persons, and in deterring the commission of crimes with guns.

B. Vinroe’s Ghost Gun Parts Business

51. To profit from the market for Ghost Guns while bypassing rules and procedures for the sale of firearms, Vinroe and other sellers in the Ghost Gun industry have sold the constituent frames and other parts of Ghost Guns (“Ghost Gun Parts”) to their customers, often in kits, allowing the customers to then assemble working Ghost Guns. This has been the core of Vinroe’s businesses.

1. Vinroe's Ghost Gun Frames

52. The centerpiece of a Ghost Gun is its frame. A “Ghost Gun Frame” is an unserialized firearm frame or receiver. Usually it is made from plastic, i.e. Polymer.

53. When Vinroe, JSD, and others at his Eagle gun shows sold Ghost Gun Frames, they sold them unfinished. That is, Vinroe's Ghost Gun Frames required minor steps—just additional drill holes, bending, or milling—to be ready for use in a gun. Such easily-finished Ghost Gun Frames were sometimes referred to as 80% frames.

54. By selling the frames unfinished, Vinroe sought to avoid the federal laws governing the sale of firearms or their frames. Until August of 2022, federal law distinguished between Ghost Gun Frames that were ready-to-use and those that needed finishing.

55. Vinroe's Ghost Gun Frames were designed to make it simple for even novice customers to finish the Ghost Gun Frames and thereby turn them into fully operational Ghost Guns using nothing more than household tools. Vinroe told purchasers which specific tools (such as drill bits) were needed for the finishing, and in fact provided those tools. Vinroe's businesses provided instructional materials as well.

56. To make the process of assembling a working Ghost Gun even easier, Vinroe and his vendors provided customers with “jigs”—manufacturer-designed and manufacturer-issued bracketing that marks and lines up the drill holes and secures the unfinished frame in place.

57. By way of illustration, Vinroe and his vendors sold Ghost Gun Frames made by the leading manufacturer of such products, Polymer80. Those frames are pieces of plastic molded to mimic the frame of a Glock-style handgun.

58. Vinroe and his vendors have sold, alongside or included within the frame, a red plastic jig that enables users to envelop the unfinished frame with bracketing that contains precise

openings for drilling holes. They also have provided drill bits that correspond to those holes. Such kits could be seen on the Polymer80 website—for example, this model with a molded black frame:⁹



59. Polymer80’s website provided complete instructions on how to use these tools to finish the Ghost Gun Frame, and then join the Ghost Gun Frame with other Ghost Gun Parts, to make a working Ghost Gun.¹⁰ Polymer80’s signature Ghost Gun Kit product was its “Buy, Build, Shoot” kit.

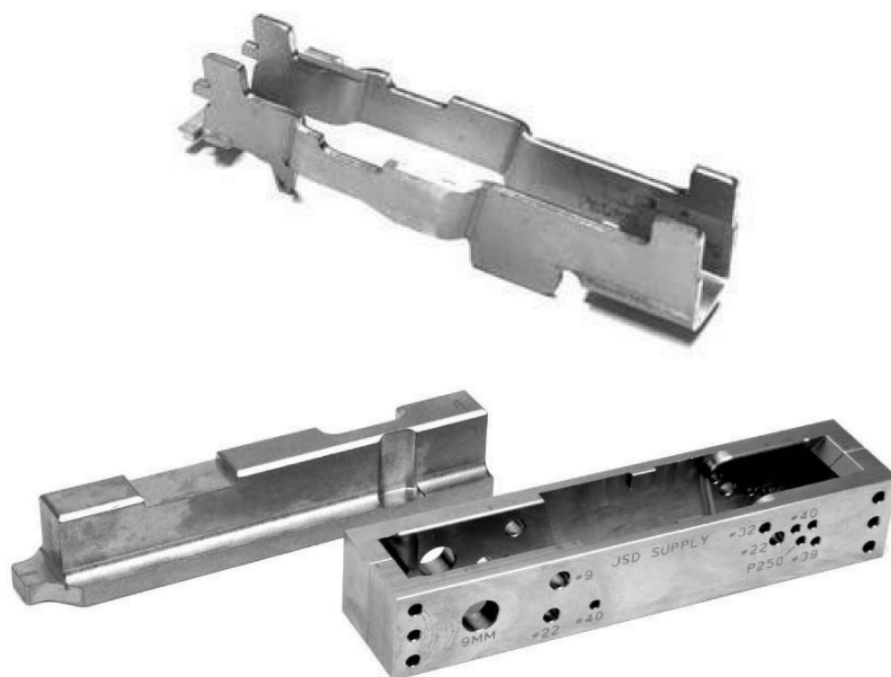
60. Another example is JSD’s proprietary MUP-1 Ghost Gun Frame (“MUP-1 Frame”), designed to make a Ghost Gun clone of the popular Sig Sauer P-320 handgun. The MUP-1 Frame is a cast or molded piece of stainless steel that closely resembles a Sig Sauer handgun’s “Fire Control Unit.” The jig is steel and has a lid to hold the MUP-1 Frame in place. The jig has labeled holes corresponding to where users are to drill or mill. Vinroe and his companies have

⁹ Polymer80, PF940v2 80% Full Size Frame Kit - Gray, https://web.archive.org/web/20231213070612/https://www.polymer80.com/PF940v2-80-Full-Size-Frame-Kit-Gray_2 (archived Dec. 13, 2023).

¹⁰ Polymer80, How To, <https://web.archive.org/web/20240418035613/https://polymer80.com/how-to-manuals/> (archived April 14, 2024).

posted instructional materials, including videos, showing how that finishing is done. Often, those videos feature Vinroe's own voice, telling customers how to finish the Ghost Gun. As Vinroe explained in an interview: "You gotta drill some holes and bend those tabs that are sticking up, that's what would make the rail that a slide would go on."¹¹

61. JSD's MUP-1 Frame (top image) and its finishing jig (bottom image) can be found below:



62. In a December 2020 interview, Vinroe claimed to be the largest retailer of Ghost Gun Frames for handguns in the country.¹²

¹¹ Is It Local Interview, at 37:37.

¹² John Crump Live, Fireside Chats 154: Jordan Vinroe - JSD Supply, at 27:40–28:20 (Dec. 16, 2020), <https://podcast.crumpy.com/e/fireside-chats-154-jordan-vinroe-jsd-supply-more-p80-information>.

2. Vinroe's Ghost Gun Kits

63. At his Eagle gun shows, Vinroe often sold Ghost Gun Frames as parts of Ghost Gun Kits. "Ghost Gun Kits" are combination packages of Ghost Gun Frames along with tools to make finishing easy, often combined with certain other Ghost Gun Parts needed to finish and assemble a Ghost Gun.

64. In addition to selling Ghost Gun Kits, Vinroe also sold all types of Ghost Gun Parts separately or in other types of combinations.

65. Many of these Ghost Gun Kits included every tool and part needed to readily make a Ghost Gun. In this way, buying Ghost Gun Kits was like buying furniture from a store like IKEA: the purchaser buys all the parts and tools needed to make the finished product, but assembles it themselves. Just as it is commonly understood that IKEA sells furniture (rather than "furniture kits"), Vinroe has said, colloquially, that he sells "firearms," not kits.¹³

3. Vinroe's Ghost Gun Parts for 3D-Printed Frames

66. Vinroe has also sold parts bundles that include every Ghost Gun Part except the frame. Vinroe has also sold all manner of gun parts individually. Vinroe's other Ghost Gun Parts—like slides, barrels, or triggers—are fully ready at the time of sale for use in a functional firearm.

67. Vinroe targeted JSD's marketing for its "everything but the frame" bundles at purchasers who will use a 3D printer to make their own frame for the Ghost Gun, and will use Vinroe's bundles to provide the remaining parts to build a complete Ghost Gun.

68. JSD's website boasted:

A 3D printed gun frame can be the perfect way to enter the hobby of homemade guns while giving you a quality firearm you can be proud of on the range. Additive manufacturing, often referred to as 3D printing, lets you build a professional-looking frame at home,

¹³ Is It Local Interview, at 6:47.

then finish it with your labor and the right 3D gun parts for a tailor-made shooting experience We're proud to offer the parts you need to turn your 3D printed gun frame into a functional firearm you can depend on.¹⁴

69. In September 2023, Vinroe's JSD email newsletter touted a particular bundle of Ghost Gun Parts known as the "Avidity Arms PD10 Complete Parts Set." It said: "The 3DPD10 Parts Kit includes every part needed to complete a build on a printed 3DPD10 Frame, using the file released by Avidity Arms through DefCad.com. This is the first time a traditional firearms manufacturer has released a printing optimized frame file to the gun making community!"

70. The email included a picture of the completed Ghost Gun that can be readily built from the Avidity Arms PD10 Complete Parts Set:



71. Vinroe has described 3D printing as an increasingly inexpensive way to make Ghost Gun Frames *at scale*. In an August 2021 interview, Vinroe stated:

It's just getting cheaper and cheaper as we go, and better too, you know the next five years is going to be crazy with home building

¹⁴ 3D Printed Gun Frames & Accessories, JSD Supply, <https://jsdsupply.com/category/3d-printed-gun-frames/> [<https://web.archive.org/web/20260315232021/https://jsdsupply.com/category/3d-printed-gun-frames/>] (emphasis added).

and 3D printing. . . . You figure [in addition to around \$300 for the printer] the filament is what, like twenty-five bucks for a spool, and I don't even know how many you can make—I just keep printing until it runs out and throw another one on so yeah, you can make like 10 receivers, like Glock-style pistols. I don't know, it's a lot.¹⁵

72. By his own description, the 3D-printed Ghost Guns process that Vinroe promotes and facilitates provides an ideal scenario for firearms traffickers to obtain weapons.

4. Vinroe's Products to Enhance Ghost Gun Lethality

73. Vinroe has done more than just sell products to make Ghost Guns: he has also sold products to make Ghost Guns deadlier. Amongst such products are Large Capacity Magazines, which can hold more rounds so that more shots can be fired without reloading. Large Capacity Magazines are generally illegal in New Jersey.¹⁶

74. Additional lethality-enhancing products include “Pull-Release Triggers”, which allow a gun to fire twice in rapid succession, both as the trigger is pulled and released, making the firearm an illegal machine gun under New Jersey law. See N.J.S.A. 2C:39-1(i), N.J.S.A. 2C:39-9(a).

75. A video posted on YouTube in 2022, capturing an exhibition, shows the effects of Vinroe's Pull-Release Trigger paired with a JSD-sold Ghost Gun. The narrator in the video stands next to Vinroe's employee “Bob” from JSD, wearing JSD-branded clothing. After saying “we've

¹⁵ The Rogue Banshee, For the Love of Guns //Episode 4// Jordan Vinroe from JSD Supply, Odysee, at 35:42–36:47 (Aug. 16, 2021), <https://odysee.com/@TheRogueBanshee:c/for-the-love-of-guns-episode-4-jordan:9>.

¹⁶ New Jersey law defines Large Capacity Magazines as “a box, drum, tube or other container which is capable of holding more than 10 rounds of ammunition to be fed continuously and directly therefrom into a semi-automatic firearm.” N.J.S.A. 2C:39-1(y). New Jersey categorically prohibits the possession of such Large Capacity Magazines by any non-military, non-law enforcement individual who does not have a specific registration. N.J.S.A. 2C:39-3.

got JSD Supply here,” the narrator test-fires the gun, firing two shots with each trigger pull and release.¹⁷

C. Vinroe’s Stated Goal Is for His Customers to Obtain Ghost Guns.

76. Vinroe’s explicitly stated business mission is to put working Ghost Guns in the hands of as many members of the public as he can.

77. In September 2023, Vinroe summarized his business model in a declaration explaining Not An LLC’s opposition to a federal law prohibition against Ghost Gun Kits involving unfinished frames or receivers.¹⁸ He explained that “JSD Supply’s historical business involved . . . the very items at issue in this case, namely 80% receivers and finishing jigs”; that “JSD also has historically produced and sold tools and jigs that can be used by individuals to personally manufacture firearm frames and receivers”; and that “JSD Supply’s customers use these products to manufacture their own firearms.” Indeed, Vinroe said that this was his “entire business model.”

78. Vinroe made similar acknowledgments in an October 2020 interview:

Interviewer: “[Y]our business is basically people want [the MUP-1 Frame and jig] to build a firearm.”

Vinroe: “Right.”

Interviewer: “You provide that.”

Vinroe: “That’s what I do.”¹⁹

¹⁷ Black Diamond Josh, PR Trigger at the PSA Gathering, YouTube at 0:24–0:26, 1:00–1:08 (Mar. 22, 2022), <https://www.youtube.com/watch?v=02oDLsXZOmE>.

¹⁸ Declaration of Jordan Vinroe at ¶¶ 3–5, Vanderstok v. Garland, 680 F. Supp. 3d 741 (N. D. Tex. 2023) (No. 4:22-cv-691-O), Dkt. No. 2633-1.

¹⁹ Is It Local Interview, at 42:07–42:06.

79. In the same interview, Vinroe said: “We could make real guns, serialized guns . . . but, I don’t want to right now. We are doing this, and this is our focus, and we are 100 percent dedicated to the home builder and . . . this product segment.”²⁰

80. Vinroe’s patent application²¹ for the MUP-1 Frame likewise makes clear that his goal is to enable buyers to make a fully functional gun: “[T]he invention is specifically fashioned to allow a completed article of manufacture²² into a pistol receiver which will accept parts manufactured to fit a Sig Sauer brand receiver such as a P320.... Such parts would readily attach to the receiver completed using the invention thereby allowing a complete firearm to be constructed.”

81. To ensure that customers could easily complete their Ghost Guns, Vinroe and his businesses provided customers with extensive instructional resources, including seminars conducted at his Eagle gun shows demonstrating how to finish Ghost Gun Frames and assemble Ghost Gun Parts.

82. For the MUP-1 Frame, Vinroe created and disseminated demonstration videos showing (a) how to finish an MUP-1 Frame using the associated jig,²³ and (b) how to join the

²⁰ Is It Local Interview, at 45:48–46:11.

²¹ U.S. Patent No. 11,117,199, at 3 (filed Oct. 23, 2019) (issued Sept. 14, 2021); U.S. Patent No. D881,313 (filed Oct. 23, 2018) (issued Apr. 14, 2020).

²² “Article of manufacture” is a term of art in patent applications, and here refers to the MUP-1 Frame.

²³ JSD Supply, MUP 1 Jig Instructions, GunStreamer, (Nov. 16, 2019), [https://web.archive.org/web/20250314182734/https://gunstreamer.com/watch/mup-1-jig-instructions_dicMdzIwrAtj53.html] (archived Mar. 14, 2025).

MUP-1 with other Ghost Gun Parts to prepare it for final assembly.²⁴ Vinroe bragged to an interviewer: “It’s super easy to put together.”²⁵

83. To bolster sales of his “everything but the frame” bundles, Vinroe actively promoted the 3D printing of Ghost Gun Frames. For example, in 2022, JSD hosted the “JSD Invitational”—a design competition for making Ghost Guns out of 3D-printed Ghost Gun Frames and JSD Ghost Gun Parts.

84. JSD summarized the terms of the competition on the social media platform then known as Twitter: “16 competitors, 3d printed glock style frames being judged on cosmetic changes, \$5,000 in prize money, \$7,500 in parts sent to competitors.”

85. The invitational had a bracket:



86. Vinroe further trumpeted unserialized firearm construction in customer email newsletters. Embracing the term “Ghost Gun”, in November 2022, Vinroe’s newsletter announced the sale of the “Ghost Gunner 3”—a milling machine to make 3D-printed Ghost Gun frames—in

²⁴ JSD Supply, MUP 1 Small Parts Assembly, YouTube (Sept. 21, 2019), <https://www.youtube.com/watch?v=1lw-ad4WVFU>.

²⁵ Is It Local Interview, at 41:00 (emphasis added).

celebration of Vinroe’s birthday (“Jordan’s birthday deals”).²⁶ In April 2023, Vinroe’s newsletter announced that “the first 10 builds” of a particular handgun design would win a free patch and t-shirt.²⁷

87. In short, Vinroe has aggressively promoted the use of Ghost Gun Kits, Ghost Gun Frames, and other parts to make Ghost Guns. He has not only extolled the ease of doing so, but also actively trained consumers on how to assemble a completed Ghost Gun, and even created games incentivizing them to do so.

D. Ghost Guns Copy Prominent Serialized Firearms.

88. Once assembled, a Ghost Gun closely resembles, and operates similarly to, a name-brand serialized firearm sold by licensed firearms dealers. The most common Ghost Guns are designed to copycat Glock handguns and are even able to use Glock parts. Prior to shutting down in or around July 2024, the leading manufacturer of Glock-style Ghost Gun Kits was Polymer80. Polymer80’s products were sold by Vinroe and his vendors at his Eagle gun shows.

89. Polymer80’s Glock-style Ghost Guns look very similar to Glock handguns, and function with equivalent lethality. An image of a completed Polymer80 “P80” Ghost Gun is on the left, and a Glock G17 is on the right.²⁸

²⁶ JSD Supply, Jordan’s Birthday Deals, DealTown (Nov. 1, 2022), <https://deal.town/jsd-supply/jordans-birthday-deals-FKUMZMZPD> (no longer available).

²⁷ JSD Supply, Avidity Arms PD10 Parts Set!, DealTown (Apr. 28, 2023), [<https://web.archive.org/web/20231213080008/https://deal.town/jsd-supply/avidity-arms-pd10-parts-set-P3PU37LX9>] (archived Dec. 13, 2023) (emphasis added).

²⁸ P80 PFS9™ Pistol - Black - 10RD Magazine, Polymer80, [https://web.archive.org/web/20231213071319/https://www.polymer80.com/P80-PFC9-Pistol-Black_10] (archived Dec. 13, 2023); Glock 17 – The Original, Glock, [<https://web.archive.org/web/20251130064656/https://us.glock.com/en/pistols/g17>] (archived Nov. 30, 2025).



90. In describing Polymer80 Ghost Gun products, JSD’s website boasted that “Finishing a custom Polymer 80 parts build is easy when you shop with us. Thanks to our products, you can put together a firearm that is identical to options available straight from the manufacturer. The custom handgun you build from our Polymer 80 kit looks, feels and operates just like any other gun. But they don’t require a background check or a serial number, making them the best solution when privacy is the main concern.”²⁹

91. One vendor of Ghost Gun Parts at Vinroe’s Eagle gun shows continues to use the website domain www.p80glocks.com (emphasis added), appealing to customers seeking a Glock-style gun that can be acquired without a serial number or background check.³⁰

92. Vinroe also sold products that his companies manufactured themselves for the Glock/P80 design.

93. Vinroe marketed his in-house Glock/P80 Ghost Gun products under the “Patmos” brand as follows: “Patmos Arms brings big-brand quality to the table but leaves the big-name price

²⁹ Polymer 80 Parts and Kits, JSD Supply, [<https://web.archive.org/web/20251207130242/https://jsdsupply.com/brand/polymer-80/>] (archived Dec. 7, 2025) (emphasis added).

³⁰ Glock has sued Polymer80 for patent infringement. See Glock, Inc. v. Polymer80, Inc., No. 23-cv-0086 (D. Nev.).

tag at the door. Their aftermarket pistol barrels and slides are engineered to exacting OEM [original equipment manufacturer] standards to give you perfect fitment on all compatible pistols.”³¹

94. In addition to selling Glock-style products, Vinroe also pioneered an un-serialized clone of Sig Sauer’s P320 handgun. Sig Sauer’s frame, known as its Fire Control Unit, or “FCU”, sits within its grip and houses the trigger mechanism and other internal components, and can readily combine with original manufacturer-made and/or aftermarket parts to make a firearm. Vinroe’s MUP-1 Frame is an unserialized, unfinished clone of the P320 FCU, and is specifically designed to allow users to make a Sig Sauer-style Ghost Gun.

95. In addition to selling the MUP-1 Frame and its associated jig and finishing tools, Vinroe sold bundles of parts and accessories, i.e., everything needed to readily make a Sig Sauer-style Ghost Gun.

II. New Jersey’s Ghost Gun Laws

A. The Evolution of New Jersey Ghost Gun Laws

96. New Jersey’s Legislature has recognized and responded to the dangers presented by Ghost Guns and the Ghost Gun industry practices. It has, among other things, prohibited outright the purchase or possession of Ghost Guns, Ghost Gun Kits, and Ghost Gun Frames; it has maintained longstanding prohibitions on conspiring in or facilitating direct criminal violations; and it has most recently mandated point-of-sale controls for all Ghost Gun Parts.

³¹ Patmos Arms, JSD Supply, [https://web.archive.org/web/20260113022932/https://jsdsupply.com/brand/patmos-arms/] (archived Jan. 13, 2026). When last visited on May 15, 2026, the same website automatically went to a single page with the salutation “until we meet again,” signed “Jordan Vinroe, JSD Supply.”

1. New Jersey Bans Ghost Gun Kits and Frames

97. In November 2018, New Jersey enacted P.L. 2018, c.138 (codified at N.J.S.A. 2C:39-9), amending New Jersey’s criminal firearms code by creating new criminal prohibitions related to Ghost Guns. Particularly relevant here is N.J.S.A. 2C:39-9(k):

Purchasing firearm parts to manufacture a firearm without a serial number. In addition to any other criminal penalties provided under law, a person who, with the purpose to manufacture or otherwise assemble a firearm and without being registered or licensed do so as provided in chapter 58 of Title 2C of the New Jersey Statutes, purchases or otherwise obtains separately or as part of a kit a firearm frame or firearm receiver which is not imprinted with a serial number registered with a federally licensed manufacturer or any combination of parts from which a firearm without a serial number may be readily manufactured or otherwise assembled, but which does not have the capacity to function as a firearm unless manufactured or otherwise assembled is guilty of a crime of the third degree. Notwithstanding the provisions of N.J.S. 2C:1-8 or any other law, a conviction under this subsection shall not merge with a conviction for any other criminal offense and the court shall impose separate sentences upon a violation of this subsection and any other criminal offense.

As used in this subsection, “firearm frame or firearm receiver” means the part of a firearm that provides housing for the firearm’s internal components, such as the hammer, bolt or breechblock, action, and firing mechanism, and includes without limitation any object or part which is not a firearm frame or receiver in finished form but is designed or intended to be used for that purpose and which may readily be made into a firearm frame or receiver through milling or other means.

(underlining added to statute heading for clarity).

98. When signing the bill enacting this provision, then-New Jersey Governor Phil Murphy explained that Ghost Guns “giv[e] the public at large the ability to build their own unregistered, unsafe, and untraceable firearm. . . . [K]its to assemble ghost guns will no longer be allowed in New Jersey.” Likewise, then-Attorney General Gurbir Grewal explained that “[G]host guns put the safety of our residents and our law enforcement officers at risk, because they give

anyone—even terrorists, felons, or domestic abusers—access to an untraceable gun. . . . Governor Murphy and the Legislature [have provided] additional tools to rid our streets of these dangerous weapons.”

2. New Jersey Bans Possessing or Trafficking Ghost Guns.

99. In 2019, recognizing that Ghost Gun Kits acquired and assembled into Ghost Guns were being resold on the black market, New Jersey enacted new prohibitions on the use and trafficking of Ghost Guns. This legislation created two new provisions of the criminal code. See P.L. 2019, c.165.

100. First, the legislation added a new prohibition on firearms without a serial number to Title 2C, Section 39-3, which enumerates “Prohibited Weapons and Devices”:

Firearms without a serial number. Any person who knowingly possesses a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver as defined in subsection k. of N.J.S. 2C:39-9 which is not imprinted with a serial number registered with a federally licensed manufacturer including, but not limited to, a firearm manufactured or otherwise assembled from parts purchased or otherwise obtained in violation of subsection k. of N.J.S. 2C:39-9, is guilty of a crime of the third degree.

N.J.S.A. 2C:39-3(n) (underlining added to statute heading for clarity).

101. Second, the legislation added a new prohibition on transporting firearms without a serial number to Title 2C, Section 39-9, which contains restrictions on unlicensed weapons transport:

Transporting a manufactured firearm without a serial number. In addition to any other criminal penalties provided under law, a person who transports, ships, sells, or disposes of a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver as defined in subsection k. of this section which is not imprinted with a serial number registered with a federally licensed manufacturer, including but not limited to a firearm manufactured or otherwise assembled from parts purchased or otherwise obtained in violation of subsection k. of this section, is guilty of a crime of the second degree.”

N.J.S.A. 2C:39-9(n) (underlining added to statute heading for clarity).

102. New Jersey’s longstanding prohibitions on conspiring to commit a crime, N.J.S.A. 2C:5-2, or serving as an accomplice in the commission of a crime, N.J.S.A. 2C:2-6, complement these criminal prohibitions applicable to purchasers of Ghost Gun Kits and Ghost Gun Frames, and to users and traffickers of Ghost Guns. See also N.J.S.A. 2C:1-3 (defining territorial applicability of New Jersey criminal laws).

3. New Jersey’s Statutory Public Nuisance Law

103. In July 2022, New Jersey enacted P.L. 2022, c.56 (codified at N.J.S.A. 2C:58-33–36), a civil liability statute imposing obligations on “gun industry members” and creating a civil cause of action for the Attorney General to enforce those new obligations, as well as existing ones.

104. N.J.S.A. 2C:58-35 (“Section 58-35”) provides, as to liability:

(a)(1) A gun industry member shall not, by conduct either unlawful in itself or unreasonable under all the circumstances, knowingly or recklessly create, maintain, or contribute to a public nuisance in this State through the sale, manufacturing, distribution, importing, or marketing of a gun-related product.

(a)(2) A gun industry member shall establish, implement, and enforce reasonable controls regarding its manufacture, sale, distribution, importing, and marketing of gun-related products.

105. N.J.S.A. 2C:58-34 (“Section 58-34”) applies these prohibitions and mandates to all Ghost Gun industry actors and products, including individual persons. Under Section 58-34:

“Gun industry member” means a person engaged in the sale, manufacturing, distribution, importing, or marketing of a gun-related product, and any officer, agent, employee, or other person authorized to act on behalf of that person or who acts in active concert or participation with one or more such persons.

“Gun-related Product” means any firearm, ammunition, ammunition magazine, firearm component or part including, but not limited to, a firearm frame and a firearm receiver, or firearm accessory, which product was, or was intended to be, sold,

manufactured, distributed, imported, or marketed in this State, or which product was possessed in this State and as to which it was reasonably foreseeable that the product would be possessed or used in this State.

“Public nuisance” means any condition which injures, endangers, or threatens to injure or endanger or contributes to the injury or endangerment of the health, safety, peace, comfort, or convenience of others or which otherwise constitutes a public nuisance under common law.

106. Section 58-34 also defines “reasonable controls” as “reasonable procedures, safeguards, and business practices that are designed to,” among other things:

(1) prevent the sale or distribution of a gun-related product to a straw purchaser, a firearm trafficker, a person prohibited from possessing a firearm under State or federal law, or a person who the gun industry member has reasonable cause to believe is at substantial risk . . . of unlawfully possessing or using a gun-related product; . . .

(3) ensure that a gun industry member complies with all provisions of State and federal law and does not otherwise promote the unlawful sale, manufacture, distribution, importing, marketing, possession, or use of a gun-related product.

107. Section 58-35(a)(2)’s Reasonable Controls mandate, along with Section 58-34’s definitions of Reasonable Controls and Gun-Related Product, together mean that a Gun-Industry Member must implement point-of-sale controls to prevent the sale of any firearm component or part or ammunition magazine to a straw purchaser, a firearm trafficker, or a person prohibited from possessing a firearm. That includes any Ghost Gun part or Large Capacity Magazine.

4. New Jersey Notified the Public that Ghost Gun Product Sales to New Jerseyans, Including by Out-of-State Actors, Are Unlawful.

108. The Office of the New Jersey Attorney General has notified the public and the Ghost Gun industry about the dangers of Ghost Guns and the applicability of New Jersey law to members of the Ghost Gun industry who target, serve, or aid the New Jersey Ghost Gun market. In 2018, shortly after the State first criminalized Ghost Gun Kits and Ghost Gun Frames, the Office

of the Attorney General sent public letters to Ghost Gun industry members, warning them to “cease and desist from selling and advertising ‘ghost guns’ to residents of New Jersey,” noting “these weapons are illegal in our state.”³² In 2019, New Jersey one such out-of-state Ghost Gun Kit seller, entering into a settlement in 2021.³³

109. New Jersey has issued public statements about the threat that Vinroe’s Ghost Guns pose to New Jersey. In October 2021, New Jersey arrested a Morris County resident who purchased over a dozen Ghost Gun Kits from a JSD table at an Eagle gun show in Allentown, Pennsylvania and had more illegal weaponry in his home. New Jersey’s then-Acting Attorney General announced the arrest in a joint press conference with the Pennsylvania Attorney General, stating: “We are committed to shutting down the pipeline of illegal firearms into New Jersey, especially the untraceable ‘ghost guns’ that are quickly becoming a favorite of criminals.”³⁴

110. And, as discussed in greater detail below, *infra*, ¶ 191, New Jersey brought litigation against Vinroe’s JSD and Eagle business entities in December 2023. The Complaint in that prior case discussed New Jersey’s Ghost Gun and other firearms laws at length.

B. New Jersey Firearms Purchase and Possession Laws

111. New Jersey’s prohibitions against transactions in Ghost Guns, Ghost Gun Kits, and Ghost Gun Frames—and its point-of-sale-requirements for transactions in all Ghost Gun Parts—

³² N.J. Attorney General, Letter to Ghost Gun Industry Members (Jun. 12, 2018), [https://web.archive.org/web/20260118020330/https://nj.gov/governor/news/news/docs/Ghost_Gun_Letter.pdf] (archived Jan. 18, 2026).

³³ N.J. Attorney General, AG Grewal Announces First-in-the-Nation Settlement with Ghost Gun Company (Mar. 18, 2021), https://www.njoag.gov/ag-grewal-announces-first-in-the-nation-settlement-with-ghost-gun-company.

³⁴ Mike Catalini, New Jersey, Pennsylvania Collaborate in Ghost Gun Case, Associated Press (Oct. 29, 2021), https://apnews.com/article/pennsylvania-new-jersey-gun-politics-0d26d82649361995be8f991428752d39.

complement New Jersey's laws concerning both those persons who cannot lawfully purchase or possess a firearm and the required steps for obtaining a lawful firearm.

112. In New Jersey, no person may purchase a firearm without first receiving a state-issued Firearms Purchaser Identification Card ("FPIC") or, in the case of a handgun, a separate permit to purchase a handgun. N.J.S.A. 2C:58-3.³⁵ To be issued an FPIC or a handgun purchase permit, a person must meet certain qualifications. *Id.* These include having no prior conviction for a crime in New Jersey or its felony counterpart in any other state or federal jurisdiction, being over the age of 18 (or 21 for a handgun), and not being subject to a domestic violence restraining order. In addition, at the point of sale, all firearms transactions must go through a licensed gun dealer, who must first complete a National Instant Criminal Background Check on the purchaser before consummating the transaction. *Id.*

113. People with prior convictions for, among other offenses, aggravated assault, aggravated sexual assault, carjacking, robbery, racketeering, domestic violence, or firearms trafficking are all disqualified from possessing a firearm under any circumstance. N.J.S.A. 2C:39-7; N.J.S.A. 2C:39-5(j). There are additional public safety restrictions of this type. For example, the Prevention of Domestic Violence Act of 1991 and the Extreme Risk Protective Order Act of 2018 restrict access to firearms for individuals at an elevated risk of harming themselves or others. N.J.S.A. 2C:25-17 et seq.; N.J.S.A. 2C:58-20 et seq.

³⁵ There are limited exceptions, such as for transactions between immediate family members or between law enforcement officers.

C. Trafficking Indicators

114. New Jersey has also enacted legislation that codifies when firearms trafficking can be presumed. See Real Accountability for Consequences of Unlawful Trafficking of Firearms Act, P.L. 2023, c.148 (S. 3150 (2022)).

115. This law expressly permits the trier of fact in a criminal case to infer that a seller-defendant has the requisite intent to commit a firearm trafficking violation if the seller:

(1) transferred or planned to transfer the firearm within forty-five days of their own purchase and receipt of the firearm;

(2) sold the other person three or more firearms within a one-year period;

(3) received compensation for the firearm that was significantly above the fair market value;

(4) did not conduct the transaction through a licensed retail dealer;
or

(5) did not abide by the requirements of N.J.S.A. 2C:58-3(a)(3) or (b)(3) to complete a National Instant Criminal Background Check and did not provide a receipt or other documentation of the sale.

P.L. 2023, c.148 (underlining added to emphasize disjunctive).

116. Out-of-state conduct is “sufficient for prosecution if the defendant knew or should have known that the recipient of the firearm intended to possess, transfer, dispose, sell, or otherwise transport the firearm in this State.” Id.

III. The History of Vinroe’s Robust, Integrated Ghost Gun Businesses

A. Vinroe Finds JSD Supply and Targets New Jersey Through Eagle’s Shows.

117. Vinroe established his JSD Supply business in 2013. Initially, Vinroe sold Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts made by other manufacturers, including Polymer80.

118. Rather than building geographically fixed, capital-intensive brick and mortar storefronts, Vinroe identified two primary, alternative ways to reach the relevant customer base: online sales and gun shows.

119. Gun shows became key to Vinroe's access to the New Jersey market. Online sales are not conducive to cash payment and create a paper trail; they also require shipment to the purchaser's address. By contrast, at a gun show, products are readily obtained for cash in person. This allowed Vinroe to target and serve New Jersey customers but consummate the sales just outside of New Jersey's borders and, in many if not most cases, leave no paper trail.

120. The largest and most prominent gun show series in Pennsylvania, Eagle Shows, provided Vinroe with multiple venues near the New Jersey border to market and sell Ghost Gun products. Eagle, then operating under separate ownership as Eagle Arms Productions, held near-weekly gun-show bazaars in Pennsylvania, frequently in locations close to New Jersey. These Eagle gun shows allowed vendors to sell any variety of guns, gun parts, and gun paraphernalia. Eagle did not limit or control its vendors' sales of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts.

B. Vinroe Expands into Manufacturing.

121. Having already built himself into a major retailer of other companies' Ghost Gun products, and having leveraged the Eagle gun shows to sell to the high-demand New Jersey market, Vinroe then expanded his Ghost Gun businesses.

122. Beginning around 2018, Vinroe started designing and manufacturing his own Ghost Gun products, including those under the Patmos brand.

123. Having observed the Polymer80 Ghost Gun's dominance of Glock-style Ghost Guns, Vinroe aimed to do the same for Sig Sauer designs. According to Vinroe, the Sig Sauer

P320, an increasingly popular design known for its modularity, was “going to be the next AR15, at least for the pistol world.”³⁶

124. Vinroe launched his proprietary MUP-1 Frame, with its accompanying jig for making a P320-style Ghost Gun. Bringing these products to market, and cornering that market through a patent, positioned Vinroe as the dominant player in the world of unserialized Sig Sauer Ghost Gun clones.

125. Taken together, Vinroe—as a sole proprietor—built a major integrated retailer, manufacturer, and patent-holding inventor of a wide range of gun parts, all oriented around bringing to market products to make Ghost Guns.

C. Vinroe Purchases Eagle, Giving Him Control of the Point of Sale.

126. By 2020, Vinroe’s sole-proprietor JSD business had, according to Vinroe, become the country’s largest retailer of Ghost Gun Frames. It was a primary contributor to New Jersey’s emerging Ghost Gun nuisance, and it was emerging as a leading manufacturer in the Ghost Gun market. That year saw rapid expansion of its sales to New Jersey residents and others at Eagle gun shows. But then, action by the Pennsylvania Attorney General threatened to derail Vinroe’s growing businesses.

127. On March 7, 2021, Josh Shapiro, then the Pennsylvania Attorney General, announced the interdiction and arrest of two Ghost Gun trafficking networks that were sourcing their Ghost Guns from vendors at Eagle gun shows.

128. Shortly thereafter, Kim Stolfer, President of Firearms Owners Against Crime, confronted Vinroe at the next Eagle gun show about his role in providing Ghost Guns to criminals.

³⁶ John Crump Live, The Patron Saint of 80s with St. Jordan Vinroe!, at 27:40 (YouTube, Dec. 29, 2021), <https://www.youtube.com/watch?v=u1NshwJ5IKM>.

129. Vinroe refused to change his business practices.

130. Eagle's then-owner, however, changed its policy. On March 15, 2021, the Pennsylvania Attorney General announced that Eagle had agreed to halt the sale of Ghost Gun Kits and Ghost Gun Frames at its gun shows, stating: "Ghost guns are quickly becoming the weapon of choice for criminals and fueling the gun violence epidemic. These DIY gun kits should be subject to the same background checks and qualifications as fully functioning firearms to prevent criminals who are not legally able to purchase or possess guns from getting their hands on these deadly, untraceable weapons."³⁷

131. This decision by Eagle's then-owner to stop the sale of Ghost Gun Kits and Ghost Gun Frames at its shows threatened to end Vinroe's access to the New Jersey market.

132. Vinroe responded by mobilizing his customers and fan base to vigorously oppose Eagle's policy change.

133. Three days later, on March 18, 2021, Eagle backed off its policy change. Vinroe and other vendors would be allowed to continue selling Ghost Gun Frames, Ghost Gun Kits, and Ghost Gun Parts at Eagle's shows, as long as customers simply claimed that they could legally own a firearm and were not bringing unfinished frames to any jurisdiction where they were illegal. But Eagle did not require vendors to maintain documentation. Nor did it even require customers to present an ID or other verification.³⁸

³⁷ Pa. Attorney General, AG Shapiro, PA Largest Gun Show Promoter Reach Agreement to Ban Sale of Ghost Gun Kits, (Mar. 15, 2021), [<https://web.archive.org/web/20250513203933/https://www.attorneygeneral.gov/taking-action/ag-shapiro-pa-largest-gun-show-promoter-reach-agreement-to-ban-sale-of-ghost-gun-kits>] (archived May 13, 2025).

³⁸ Dan Zimmerman, Sorry Josh, Eagle Arms Productions Will Allow Sales of 'Ghost Gun' Build Kits After All, The Truth About Guns (Mar. 18, 2021), <https://www.thetruthaboutguns.com/sorry-josh-eagle-arms-productions-will-allow-sales-of-ghost-gun-build-kits-after-all>.

134. Apparently, even this minimal documentation requirement—which would have done nothing more than take Ghost Gun customers at their word—was too restrictive for Vinroe. Vinroe targeted Eagle for acquisition. He registered Patriot Enterprises Worldwide LLC in October 2021 and completed the acquisition on or about December 17, 2021.³⁹ As one publication applaudingly described it, “if you can’t beat them, then buy them.”⁴⁰ This acquisition underscored that Vinroe’s access to the New Jersey market was too important to Vinroe for him to leave that access vulnerable to Eagle’s decisions.

135. In the days following his Eagle acquisition, Vinroe held a gun show less than 30 miles from Camden, at the Greater Philadelphia Exposition Center in Oaks, PA. As described by podcaster John Crump on ammoland.com: “Not only were unfinished frame and receiver kits sold once again everywhere at the gun show, but JSD Supply hosted educational classes that helped buyers of P80s finish their [Ghost Gun] kits into fully functional firearms.”⁴¹ Vinroe’s show also hosted demonstrations on 3D printing of Ghost Gun Frames.

136. The ammoland.com story included several photographs—one of JSD’s Ghost Gun Frame finishing class, and another of Vinroe posing, with a minor, holding a boxing championship-style belt with the twin insignia of Eagle and JSD:

³⁹ Special Announcement, JSD Supply, Deal Town (Dec. 25, 2021), [<https://web.archive.org/web/20231213065122/https://deal.town/jsd-supply/special-announcement-PKY8C268M>] (archived Dec. 13, 2023). According to the Pennsylvania Secretary of State’s website, the principal address for Patriot Enterprises Worldwide LLC and JSD Supply’s owner are the same.

⁴⁰ John Crump, JSD Supply Acquires Gun Show that Was Forced to Ban Them, AmmoLand (Dec. 21, 2021), <https://www.ammoland.com/2021/12/jsd-supply-acquires-gun-show-that-was-forced-to-ban-them>.

⁴¹ Id.



D. Vinroe Expands his Ghost Gun Strategy Through Combined Control of JSD and Eagle.

137. Vinroe used his purchase of Eagle to vertically integrate his Ghost Gun business, controlling product manufacture, retail sales, and gun show location, operation, and advertising.

138. Under Vinroe's concurrent management and direction of both the Eagle and JSD businesses, JSD served as the gun shows' anchor retailer, drawing in entry-fee-paying and show-boosting foot traffic with JSD's prominence and market appeal in the Ghost Gun industry.

139. Vinroe used his control of the Eagle gun shows to position his JSD retail booths advantageously. He set favorable policies for Ghost Gun product sales, marketing, and instruction. And he simply discontinued Eagle's limited attempts to weed out Ghost Gun product purchasers who were prohibited felons or New Jersey residents.

140. Affirmatively aiming at New Jersey, Vinroe moved Eagle's gun shows to locations even closer to the New Jersey border and targeted Eagle's marketing efforts at New Jerseyans. At Vinroe's direction, people who purchased an online ticket to an Eagle gun show—including people from New Jersey who supplied their email addresses and New Jersey physical addresses and opted to receive Eagle emails—were also placed on the email lists of JSD and other Vinroe-affiliated retail companies.

141. Eagle's policy changes under Vinroe attracted and benefitted other Ghost Gun product vendors at Eagle's gun shows besides JSD. Under Vinroe's protective umbrella, these other vendors had a Ghost-Gun-aligned host in Eagle, and in Vinroe a leader able to coordinate with them to boost overall Ghost Gun product sales at Eagle gun shows. Vinroe, in turn, profited from these other vendors who paid direct fees to Eagle for the ability to sell their Ghost Gun products and helped to boost overall attendance and Eagle's associated entry fees.

142. Highlighting that Vinroe used his simultaneous control of Eagle and JSD to further his overall Ghost Guns business strategy, Vinroe played the role of showman for both businesses at the same shows. On behalf of Eagle, he personally manned the entrances, greeting visitors and collecting admission tickets. When speaking on Eagle's behalf in interviews, he wore JSD Supply

t-shirts. And, he aggressively promoted and sold JSD's products to customers, including Ghost Gun products sold to New Jersey residents.

143. On Christmas Eve 2021, Vinroe celebrated the mutual benefits of the JSD-Eagle union. He wrote to JSD's email list—the size of which, upon information and belief, dramatically expanded by incorporating Eagle's mailing list—that:

As of December 17, 2021, Jordan Vinroe (Owner of JSD Supply) has acquired Eagle Shows gun show promotion in Pennsylvania. We are excited to be able to expand our business within the firearms industry. Eagle Shows is the premiere gun show promoter in PA. Our grand opening weekend at the Oaks Pa show on December 17-19 resulted in record breaking attendance! We will continue to bring you some of the biggest and best shows in the country. We have already added 2 new shows to the line up and are anticipating a huge year for 2022. Thank you for all of your support over the years!

-Jordan Vinroe (emphasis added)

144. In March 2022, NBC News reported on the sales practices at Eagle's gun shows under Vinroe's leadership.⁴² NBC's report included video of a hidden-camera purchase of a Polymer80 Ghost Gun Kit from a JSD table at an Eagle gun show in Oaks, PA. In the video, the purchaser asked whether he needed to present identification or undergo a background check. Vinroe's salesperson responded no, and that all that was needed was money. The purchase was then made in cash.

145. Discussing the Ghost Gun finishing and assembly process, the worker said that the kit "comes with the drill bits" and explained "you just drill in three holes on each side" using the jig and "cut these tabs off." He added: "there's tons and tons of videos online."

⁴² NBC News, Top Story with Tom Llamas - March 17, YouTube (Mar. 17, 2022), <https://youtube.com/watch?v=-BUIEk8xwqw>.

146. Interviewed by NBC, Vinroe acknowledged that criminals would use his products to quickly assemble Ghost Guns to commit crimes, yet he defended his sale of Ghost Gun Kits for cash without background checks. Asked directly whether he “bears responsibility” for “handing [criminals] a piece that they could build in half an hour and turn into a gun,” Vinroe said: “I’m not a criminal . . . you can get keys and a pack of Budweiser and drunk drive and kill somebody too.” Vinroe characterized his sales of Ghost Gun Kits as “like buying a lawn chair at Walmart—you can buy a lawn chair just for cash.”

E. Vinroe’s Misconduct Continues Even After Federal Law Changes.

147. After years of fueling an ever-growing surge of Ghost Guns in New Jersey—including eight months of operating the self-described largest retailer of unfinished Ghost Gun Frames in tandem with operating his Eagle gun shows—Vinroe’s retail practices were forced to change in August of 2022. The federal government began at that time to classify unfinished frames and receivers as firearms, thus requiring serialization and point-of-sale background checks as a matter of federal law. *See* 27 CFR §§ 478.11, 478.12 (2026).

148. Vinroe later explained: “JSD Supply ceased selling **ALL** 80% receivers and jigs on August 17/18, 2022 to give a clear break in when we stopped selling due to fear of the unclear ‘new rule’ regulations. We have not sold an 80% or jig since then. We have continued to sell other replacement parts such as triggers, barrels, slides, pins, and springs.”⁴³

149. Vinroe thus continued, even after that change in federal law, to contribute to New Jersey’s Ghost Gun epidemic and to otherwise make or facilitate sales that violated New Jersey law.

⁴³ Declaration of Jordan Vinroe at ¶ 10, *Vanderstok v. Garland*, 680 F. Supp. 3d 741 (N. D. Tex. 2023) (No. 4:22-cv-691-O), Dkt. No. 263-1.

150. First, Vinroe continued to market his Eagle gun shows directly to New Jerseyans, to locate his gun shows close to New Jersey, and to run those gun shows without any restrictions on its vendors selling Ghost Gun Frames, Ghost Gun Kits, or Ghost Gun Parts. Vinroe’s gun shows also continued to allow the sale to New Jersey residents of Large Capacity Magazines and other items prohibited by New Jersey law. Vinroe did not require his Eagle gun show vendors to implement point of sale control requirements to ensure that New Jersey purchasers of gun-related products were not prohibited from possessing a firearm.

151. Under Vinroe, Eagle gun show vendors continued to sell Ghost Gun Frames, Ghost Gun Kits, and Ghost Gun Parts – including parts and products illegal in New Jersey – to New Jersey residents. These sales were often made for cash and without any measures to assess whether the purchasers were prohibited from possessing firearms.

152. Second, Vinroe continued his retail business in Ghost Gun products other than Ghost Gun Frames and the jigs to complete them. At his Eagle-branded gun shows, Vinroe continued to sell “everything but the frame” bundles for use with a 3D printed frame, Large Capacity Magazines, Pull-Release Triggers, and more. He or his salespersons, operating at his direction, made such sales to New Jersey residents, in cash, without any measures to assess whether they were prohibited from possessing firearms.

IV. Vinroe Has Specifically Targeted New Jersey.

A. Vinroe’s Knowledge of New Jersey Law and Specific Targeting of the New Jersey Ghost Gun Market

153. Vinroe publicly discussed New Jersey’s criminal prohibitions against Ghost Guns, Ghost Gun Kits, and Ghost Gun Frames, confirming his understanding of those laws. For example, a primer posted to the Eagle website in April 2022 explained that, in New Jersey, “[h]omemade

firearms, like those assembled from the much demonized 80% lower, are illegal, as are the unmilled receiver blocks themselves.”⁴⁴

154. The introduction to that same article specifically observed that “so many visitors” to Vinroe’s Eagle gun shows “split[] their time between the Keystone state and our Eastern neighbor” (on a page titled, “Gun License in New Jersey – How to Buy in PA.”).⁴⁵ The article provided a lengthy overview of New Jersey gun laws, stating “every effort is made to accurately represent the laws, rules, and regulations of the State of New Jersey.”

155. Despite this demonstrated knowledge of New Jersey’s prohibitions, and of their large New Jersey customer base, Vinroe continued to sell Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts targeted at New Jersey residents from locations selected for their proximity to New Jersey.

156. Vinroe also continuously disregarded even the most rudimentary measures to exclude prospective New Jersey buyers of Ghost Gun Kits, Ghost Gun Frames, or “everything but the frame” bundles. Vinroe did not implement basic safeguards to prevent the sale of any Ghost Gun Parts to New Jersey straw purchasers,⁴⁶ firearms traffickers, individuals convicted of serious or dangerous crimes or other persons prohibited from possessing firearms.

157. Vinroe’s retail businesses and gun shows, for example:

- Have not required salespersons to ask purchasers about their state of residence;

⁴⁴ Gun License in New Jersey – How to Buy in PA, Eagle Shows (Apr. 28, 2022), [https://web.archive.org/web/20260217045342/https://eagleshows.com/gun-license-in-new-jersey-how-to-buy-in-pa/] (archived Feb. 17, 2026).

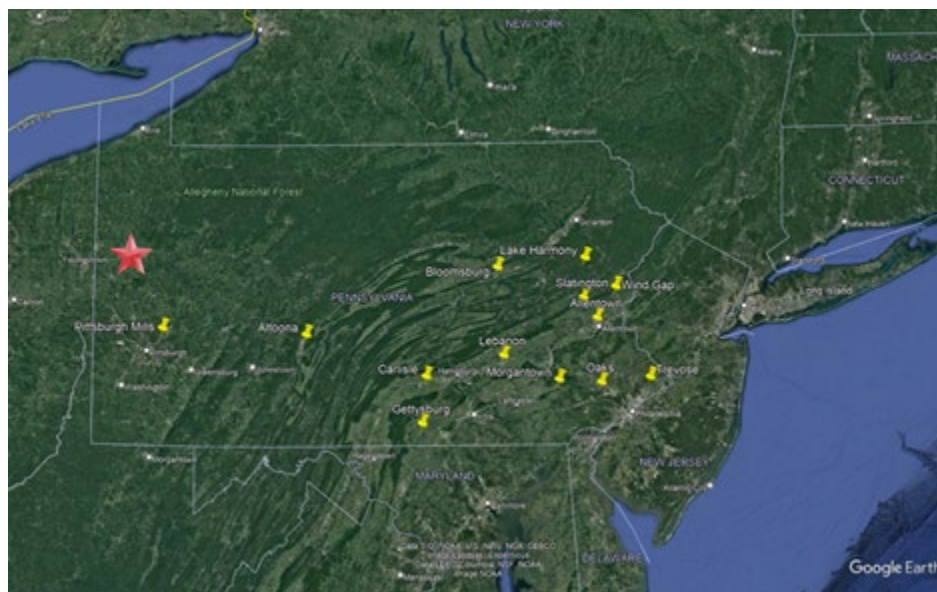
⁴⁵ Id.

⁴⁶ The term “straw purchase” commonly refers to a situation where a person who can pass a background check purchases a firearm for someone who cannot, or for a person who does not otherwise want to be associated with the transaction.

- Have not required purchasers of Ghost Gun Kits, Ghost Gun Frames, or Ghost Gun Parts to display state identification;
- Have not subjected purchasers of Ghost Gun Kits, Ghost Gun Frames, or Ghost Gun Parts to any verification process to ensure that they are legally allowed to own or possess a firearm in New Jersey, or have not been found to present a danger in possessing a firearm in New Jersey;
- Have not posted clear signage warning New Jersey residents that Ghost Gun Kits and Ghost Gun Frames to make Ghost Guns—as well as completed Ghost Guns—are illegal under New Jersey law and could subject them to criminal penalties;
- Have not required their employees to refuse a sale to a purchaser who appears to be from New Jersey; and
- Have routinely accepted cash, leaving no paper trail for the transaction.

158. Rather than exclude New Jersey buyers or applying point-of-sale controls, Vinroe purposefully solicited and targeted them for sales without controls.

159. Prior to Vinroe's acquisition, Eagle had already located many of its shows in the eastern part of Pennsylvania, where they were accessible to New Jersey customers. When Vinroe became Eagle's owner, he sought to maximize what he had already identified as a particularly strong customer base in New Jersey, increasing the gun shows' eastward orientation—despite the fact that he and his businesses were based close to the Ohio border in western Pennsylvania. In the map below, the yellow pins are locations of Eagle gun shows from 2018 to December of 2023, identifiable through public sources; the red star represents where Vinroe's companies were based and where, upon information and belief, Vinroe lives:



160. As discussed above, Vinroe actively advertised these shows in New Jersey on billboard advertisements along well-traveled roadways. See supra ¶¶ 36-42.

B. The Frequent Recovery of Vinroe’s Products in New Jersey

161. Significant numbers of New Jersey buyers have been observed by law enforcement purchasing Vinroe’s Ghost Gun Kits, Ghost Gun Frames, and Ghost Gun Parts from Vinroe, his salespersons, or others at his gun shows, and promptly taking those products back to New Jersey. They have been prosecuted accordingly.

162. But the true magnitude of the influx of Vinroe’s Ghost Gun products into New Jersey cannot be known with certainty because of Vinroe’s product design (without serial numbers), sales process (without background checks or purchaser paperwork), and method for processing transactions (in cash).

163. Police work by New Jersey law enforcement, however, confirms Vinroe’s years-long pattern and practice of putting Ghost Guns into the hands of New Jerseyans. The associated criminal activity detailed below illustrates how Vinroe’s sale of Ghost Gun products to New Jerseyans—without reasonable controls—directly threatens public safety in New Jersey.

1. New Jersey Residents Arrested for Unlawful Possession of Vinroe's Ghost Gun Products

164. New Jersey law enforcement authorities have arrested numerous individuals returning to New Jersey from Eagle gun shows with Ghost Gun Kits, Ghost Gun Frames, and/or Ghost Gun Parts. Most of these individuals were New Jersey residents who traveled to an Eagle gun show in a car with New Jersey license plates. On information and belief, many (if not all) of them made or participated in a purchase while carrying New Jersey-issued identification, including some in a visible manner. Yet JSD or another Eagle vendor still sold these persons multiple Ghost Gun Kits—a telltale indicator of a purchaser's intent to traffic. In many cases, these purchasers, or these purchasers' co-conspirators, had prior criminal records that disqualified them from gun purchase or possession.

165. These arrests occurred after the March 2021 announcement by the Pennsylvania Attorney General that vendors at Eagle gun shows (such as JSD) had sold numerous Ghost Gun Kits to two separate Pennsylvania gun trafficking networks. They include many arrests made after Vinroe's December 2021 acquisition of Eagle.

166. Certain details about the events giving rise to such arrests are now public, and include the following:

- a. In September 2021, two North Jersey residents were arrested crossing back into New Jersey after going to JSD's table at Eagle's Allentown, PA gun show. The items seized during those arrests included:
 - Thirteen Polymer80 Ghost Gun Frames
 - Two JSD jigs
 - Additional Ghost Gun Parts to complete working firearms
 - Sixteen illegal Large Capacity Magazines, for handguns and assault rifles
 - An AR-15-style Ghost Gun assault weapon made from Ghost Gun Parts purchased at a prior gun show (found during a search of one of their homes, after the arrest at the border)⁴⁷

⁴⁷ See New Jersey v. Pillus, Case No. MRS-21-001361.

- b. In February 2022, three Camden residents went to a JSD table at Vinroe's Eagle gun show in Oaks, PA, and purchased two bags' worth of Polymer80 Ghost Gun Frames and finishing kits. Law enforcement searched their house and recovered:
 - Two finished Ghost Guns
 - Numerous additional Ghost Gun Parts and Ghost Gun manufacturing tools

Prosecutors charged each defendant with seven violations of 2C:39-9(k). Law enforcement also identified a co-conspirator who had a prior conviction for child endangerment and thus was disqualified from purchasing or possessing a firearm.⁴⁸
- c. In February 2022, a pair of Camden residents purchased at least seven Polymer80 Ghost Gun Kits from JSD at another Eagle gun show. One had a history of criminal weapons possession. Law enforcement conducted a search and found the kits, plus:
 - Two additional handguns
 - Large Capacity Magazines⁴⁹
- d. In March 2022, a Cherry Hill resident with a prior criminal conviction attended Vinroe's Eagle gun show in Allentown, PA and walked out with:
 - Five Polymer80 Ghost Gun Kits
 - Associated parts to complete Ghost Guns
 - Six 21-round Large Capacity Magazines for a 9mm handgun

According to investigators, the man "stated that he observed a billboard advertising the Allentown Gun Show which peaked [sic] his interest;" "stat[ed] he didn't know he wasn't able to purchase the items, especially since they let him purchase it;" and "figured if it was illegal to purchase, they would ask him for identification or something, but they didn't ask him for nothing so he thought it was okay to buy."⁵⁰
- e. In July 2022, two Trenton residents attended Vinroe's Eagle gun show in Trevoise, PA, approximately nine miles from the New Jersey border. They returned to Trenton with:
 - Five Polymer80 Ghost Gun Kits
 - Large Capacity Magazines
 - Additional Ghost Gun Parts⁵¹

⁴⁸ See New Jersey v. DeJesus, Case No. CAM-22-000891.

⁴⁹ See New Jersey v. Dupree, Case No. CAM-22-000837.

⁵⁰ See New Jersey v. Rivera, Case No. CAM-22-001662.

⁵¹ See New Jersey v. Oliver, Case No. MER-22-002437.

167. New Jersey law enforcement has arrested numerous additional persons since July 2022 returning to New Jersey with Ghost Gun Kits, Ghost Gun Frames, and Ghost Gun Parts from Vinroe's Eagle gun shows, including, for example, in June 2023.⁵²

2. Other JSD Ghost Guns Recovered in New Jersey

168. Law enforcement in New Jersey has also recovered and identified multiple Ghost Guns in New Jersey that appear to have JSD Ghost Gun Frames. For example, in December 2019, a Sig Sauer style Ghost Gun was recovered from a Camden County drug dealer who used the gun to threaten his girlfriend, resulting in a domestic violence restraining order.⁵³ Upon information and belief, JSD (using Jordan Vinroe's patent) is the only manufacturer that has made unfinished clones of Sig Sauer handgun frames for sale to purchasers.

169. Investigations conducted by other jurisdictions into Vinroe's activities have revealed more New Jersey sales. The City of Philadelphia reported in litigation it filed against JSD (as well as Polymer80) that "when investigators attended the Eagle Show in Oaks, Pennsylvania . . . they observed several buyers of [Ghost Gun Kits] with New Jersey IDs in their wallets."⁵⁴

170. The foregoing examples represent only a small fraction of Vinroe's overall contribution of untraceable Ghost Guns to the Ghost Gun public nuisance in New Jersey. Vinroe has been among the largest, if not the largest, purveyors of Ghost Gun products to New Jersey residents.

⁵² See New Jersey v. Devine, Case No. MER-23-002011.

⁵³ See New Jersey v. Smith, Case No. CAM-19-008659.

⁵⁴ City of Philadelphia v. Polymer80, Inc., et al, No. 230700362 (Phila. Ct. Com. Pl. July 5, 2023) (Complaint at ¶ 150). That case has since settled.

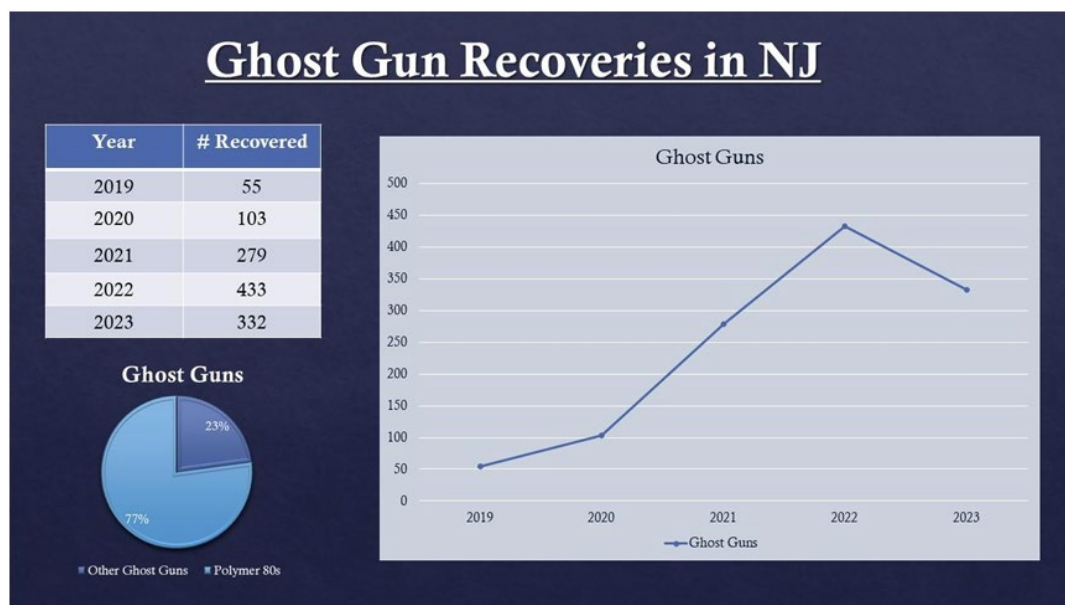
V. Vinroe's Unlawful Conduct Has Contributed to a Public Nuisance in New Jersey.

A. Ghost Guns Have Accounted for a Substantial Share of Crime Guns in New Jersey.

171. Ghost Guns account for a large number of the crime guns recovered at New Jersey crime scenes every year.

172. In September 2024, New Jersey's State Commission on Investigation issued a public report of its findings from an investigation into illegal firearms and gun violence trends in New Jersey.⁵⁵

173. According to that report, New Jersey law enforcement authorities recovered 55 Ghost Guns at New Jersey crime scenes in 2019. In 2020, that number nearly doubled, to 103 reported recovered Ghost Guns. In 2021, reported recovered Ghost Guns nearly tripled, to 279 Ghost Guns. And in 2022, reported recovered Ghost Guns soared further, to 433.



⁵⁵ State of New Jersey Commission of Investigation, Illegal Firearms: Use & Trends in New Jersey (Sep. 2024), <https://www.nj.gov/sci/documents/2024-10-SCI-Illegal-Firearms-Report.pdf>.

174. The reported recovery of 433 Ghost Guns from New Jersey crime scenes by New Jersey law enforcement authorities in 2022 was more than four times the number of Ghost Guns reported recovered in 2020, despite overall firearms recoveries remaining stable.

175. There is good reason to believe these numbers significantly understate the share of crimes in which Ghost Guns were used, because Ghost Guns used in crimes may not have been recovered, or may have been recovered but not correctly classified as Ghost Guns.⁵⁶

176. While the August 2022 change in federal law to classify unfinished Ghost Gun Frames as subject to federal product laws has had a positive impact, the number of recovered Ghost Guns at New Jersey crime scenes has remained high.

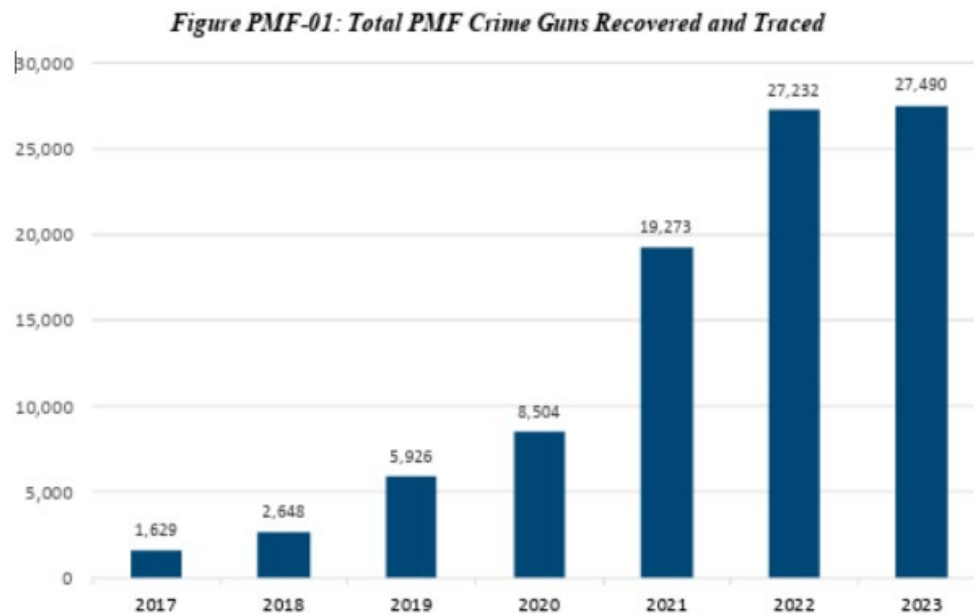
177. Subsequent data indicates that for the years 2023 to 2025, New Jersey law enforcement recovered 752 total Ghost Guns out of a total 12,951 crime guns overall. That is approximately 251 Ghost Gun recoveries per year in this time period, representing approximately 6% of crime gun recoveries overall.

178. These continued high recovery numbers reflect both the persisting effect of Vinroe and others' sales prior to the August 2022 rule change, as well as their ongoing efforts since August 2022 to continue to serve Ghost Gun customers.

179. Ghost Gun involvement in criminal activity is not unique to New Jersey. The Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF") has reported that, from January 2017 to December 2023, law enforcement agencies in the United States recovered and reported more than 92,000 suspected Ghost Guns from crime scenes. Similar to the New Jersey trendline,

⁵⁶ For example, Ghost Guns are often assembled incorporating parts that correspond to registered firearms. As a result, those firearms may be misidentified as the serialized firearms from which such parts came, when they are in reality Ghost Guns that should have been included in the above tally.

the national rate of recovery rapidly increased, with over 27,000 reported recoveries in 2022 and again in 2023:



180. This ATF data only included Ghost Guns that were submitted for ATF tracing. “Based on available information,” ATF said, “there are likely much higher numbers of recovered [Ghost Guns] at law enforcement agencies that have not been submitted for tracing.”⁵⁷

B. The Harms and Costs of Ghost Gun Violence

1. Victims and Their Families

181. The most obvious harm from Ghost Gun violence is felt by its direct victims. In 2021, for example, there were 276 gun-related homicides in New Jersey.⁵⁸ This number has

⁵⁷Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), National Firearms Commerce and Trafficking Assessment (NFCTA) Volume IV, Part V: Privately Made Firearms Updates and New Analysis (Jan. 8, 2025), <https://web.archive.org/web/20250109043909/https://www.atf.gov/file/199151/download>.

⁵⁸ Ctrs. for Disease Control & Prevention, WISQARS Fatal and Nonfatal Injury Reports, <https://wisqars.cdc.gov/reports/?o=MORT&y1=2021&y2=2021&t=0&d=&i=3&m=20890&g=34&me=0&s=0&r=0&ry=0&e=0&yp=65&a=ALL&g1=0&g2=199&a1=0&a2=199&r1=INTENT&r2=NONE&r3=NONE&r4=NONE> (last visited July 14, 2026).

fortunately gone down: 191 people died as a result of gun violence in New Jersey in 2023, 152 in 2024,⁵⁹ and 107 in 2025.⁶⁰ In each year, the number of non-fatal criminal shooting victims was several times greater.

182. Vinroe's Ghost Gun Product sales were designed to avoid background check and other point-of-sales controls designed to limit the ability of persons with significant histories of violence from obtaining a firearm. In the domestic violence context, when an abusive partner has access to a gun, a domestic violence victim is five times more likely to be killed.⁶¹

183. The mental health impacts on direct victims are also severe. According to a study conducted by the University of Pennsylvania's Perelman School of Medicine, of 2,629 shooting incidents surveyed, 31 percent involved one or more corresponding mental health-related emergency department visits in the 60 days following the shooting.⁶²

2. Family and Community Impacts

184. Ghost Gun violence likewise profoundly impacts the families of victims, including mothers and fathers who have lost children to gun violence or children who have lost a parent to gun violence.

185. Anyone who is present during gun violence faces risks to their own mental health. David Hemenway, Director of the Harvard Injury Control Research Center, explains that exposure

⁵⁹ Combating Violent Crime and Gun Violence, State of N.J., Dep't of L. & Pub. Safety, Off. of the Att'y Gen., <https://www.njoag.gov/programs/combating-violent-crime-and-gun-violence/> (last visited July 13, 2026).

⁶⁰ Dana DeFilippo, Shootings Fell To Record Low In NJ In 2025, Officials Say, New Jersey Monitor (Jan. 6, 2026), <https://newjerseymonitor.com/briefs/shootings-record-low-new-jersey/>.

⁶¹ Who Can Have a Gun: Domestic Violence & Firearms, Giffords L. Ctr. to Prevent Gun Violence, <https://giffords.org/lawcenter/gun-laws/policy-areas/who-can-have-a-gun/domestic-violence-firearms/> (last visited July 14, 2026).

⁶² Gun Violence Exposure Associated With Higher Rates Of Mental Health-Related ED Visits By Children, Penn Medicine (Sept. 20, 2021), <https://www.pennmedicine.org/news/gun-violence-exposure-associated-with-higher-rates-of-mental-health-related-ed-visits-by-children>.

to gun violence “increases the risk for psychiatric, emotional, behavioral, and health problems,” including post-traumatic stress disorder, depression, anxiety, withdrawal, lowered academic performance, substance abuse, and delinquency. Witnessing or being a direct victim of an act of gun violence also increases the risk that an individual will themselves become a perpetrator of violence.⁶³

186. As gun violence rises, feelings of lost safety pervade and impact communities; parents keep children closer to home; and businesses erect more safety measures, which can lead to alienation within a community.

3. Economic Costs

187. In 2022, the National Institute for Criminal Justice Reform (“NICJR”) set out to measure the taxpayer cost of gun violence, specifically in the City of Newark. NICJR estimated that each homicide shooting costs taxpayers \$2,188,700, and each non-fatal shooting costs taxpayers \$1,007,077.

188. NICJR took into account six categories of costs: crime scene response, hospital and rehabilitation, criminal justice, incarceration, victim support (such as burial expenses) through the New Jersey Victim of Crime Compensation Office, and lost tax revenue.

189. Other substantial costs from gun violence include the strain on hospital systems, out-of-pocket medical expenses, heightened insurance premiums,⁶⁴ and the cost of additional law enforcement resources to deter, interdict, and mitigate crime.

⁶³ Jeffrey B. Bingenheimer et al., Firearm Violence, Exposure and Serious Violent Behavior, 308 Science 1323 (2005).

⁶⁴ Sophie Yap, The Economic Cost of Gun Violence in America, Giffords L. Ctr. to Prevent Gun Violence (May 13, 2025), <https://giffords.org/analysis/the-economic-cost-of-gun-violence-in-america/>.

190. Vinroe—who claims to have been the nation’s largest retailer of Ghost Gun Frames and also to run some of the biggest gun shows in the country, and who deliberately concentrated both of these business lines along the New Jersey border to attract New Jersey residents—is responsible for a substantial share of these costs and for fueling the ongoing public nuisance in New Jersey.

VI. Vinroe’s Conduct Continues to Harm New Jerseyans.

A. Vinroe Seeks to Avoid Responsibility for the Harms He Caused.

191. In December 2023, the Attorney General of New Jersey filed a civil enforcement action against two of Vinroe’s companies, Not An LLC and Patriot Enterprises Worldwide LLC (i.e., the JSD and Eagle business entities), for their roles in illegally fueling the New Jersey Ghost Gun nuisance.⁶⁵

192. During that litigation, Vinroe continued to host Eagle gun shows near the New Jersey-Pennsylvania border, continued to place billboards on New Jersey roadways advertising those nearby gun shows, and continued to sell large volumes of Ghost Gun products to New Jerseyans at those gun shows. Although Vinroe claims that his JSD Supply business stopped selling Ghost Gun Frames in August 2022, Vinroe continued to sell to gun show attendees illegal Large Capacity Magazines, illegal Pull-Release Triggers, and “everything but the frame” bundles.

193. Following the Attorney General’s commencement of litigation, Vinroe caused his business entities to not comply with their civil discovery obligations, even after this Court twice granted motions to compel brought by the Attorney General.

194. On April 24, 2026, the Attorney General moved for litigation sanctions, requesting adverse inferences and argument preclusion based on Vinroe’s companies’ two years of

⁶⁵ See Davenport v. Patriot Enterprises Worldwide LLC d/b/a Eagle Shows and Not An LLC d/b/a JSD Supply, No. MER-C-93-23 (N.J. Sup. Ct. Ch. Div. Dec. 12, 2023).

withholding documents central to the case. The companies' responses to that motion were due on May 28, 2026.

195. On May 7, 2026, however, Vinroe filed Chapter 7 bankruptcy petitions in the Western District of Pennsylvania on behalf of both Not An LLC and Patriot Enterprises Worldwide LLC. In doing so, counsel claimed that the companies "are dissolved, no longer operating their businesses, and divested of the assets in their estates" and that "[a]ny public threat or nuisance, real or imagined, that Defendants may have posed no longer exists as Defendants no longer exist."⁶⁶

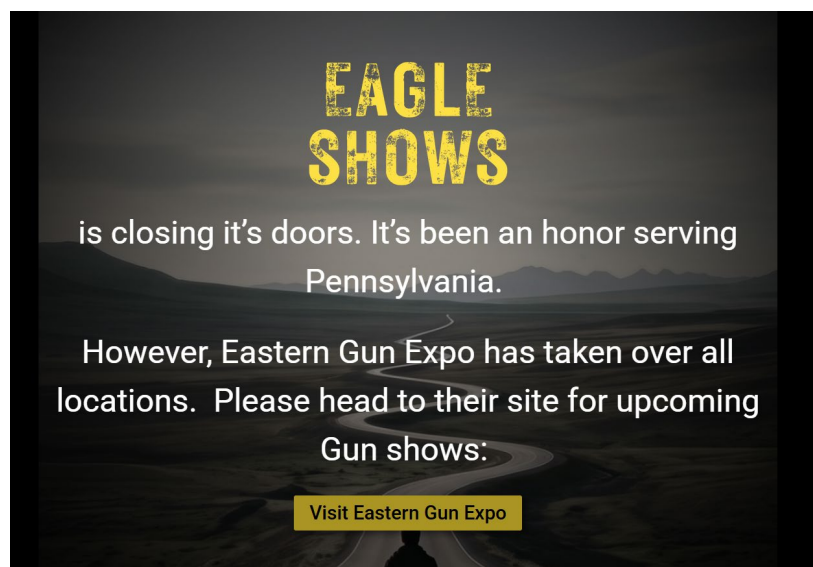
196. But Vinroe knew that the public nuisance that he created remained unremedied, and knew that he was continuing to fuel that nuisance.

B. Vinroe Continues His Gun Show and Retail Businesses.

1. The New "Eastern Gun Expo"

197. At or about the same time as the bankruptcy filings, Vinroe updated the eagleshows.com website homepage to announce that "Eagle Shows is closing it's [sic] doors . . . Eastern Gun Expo has taken over all locations. Please head to their site for upcoming Gun shows:"

⁶⁶ Correspondence on behalf of Defs., at 1, May 26, 2026, Trans. ID: CHC2026267196, Davenport v. Patriot Enters. Worldwide, LLC, et al., No. MER-C-000093-23.



198. A customer clicking on that link would be brought directly to a new webpage advertising “Eastern Gun Expo” gun shows, all taking place at the same locations and on the same dates as previously announced Eagle gun shows.

199. Upon information and belief, “Eastern Gun Expo” is Vinroe’s new branding for the same gun show series that he has been running since acquiring Eagle. In fact, Eastern Gun Expo’s “contact us” phone number is (610) 393-3047, the same longstanding phone number of Eagle.

200. The first “Eastern Gun Expo” show was held on May 16, 2026 in Allentown, PA. Only a few days beforehand, that show had been scheduled to be run as an “Eagle Shows” gun show.

201. The same was true for the “Eastern Gun Expo” gun show held from June 5 to 7, 2026 at the Greater Philadelphia Expo Center, historically Vinroe’s biggest event with thousands of attendees and a large number of vendors:

Jun 05 Friday 01:00 pm - 07:00 pm Oaks Gun Show Greater Philadelphia Expo Center – Oaks, 100 Station Avenue Oaks, PA 19456 United States	Tickets & Event Details	
Jun 06 Saturday 09:00 am - 05:00 pm Oaks Gun Show Greater Philadelphia Expo Center – Oaks, 100 Station Avenue Oaks, PA 19456 United States	Tickets & Event Details	
Jun 07 Sunday 09:00 am - 04:00 pm Oaks Gun Show Greater Philadelphia Expo Center – Oaks, 100 Station Avenue Oaks, PA 19456 United States	Tickets & Event Details	

202. Underscoring that “Eastern Gun Expo” is simply a re-brand of Eagle, its website boasted hosting “Pennsylvania’s Largest Gun Shows” even before a single “Eastern Gun Expo” show was held.



Pennsylvania's Largest Gun Shows

Eastern Gun Expo brings together buyers, sellers, collectors, vendors, and outdoor enthusiasts at some of Pennsylvania's most anticipated gun shows. Find upcoming dates, explore venues, get tickets, and plan your next visit with confidence.

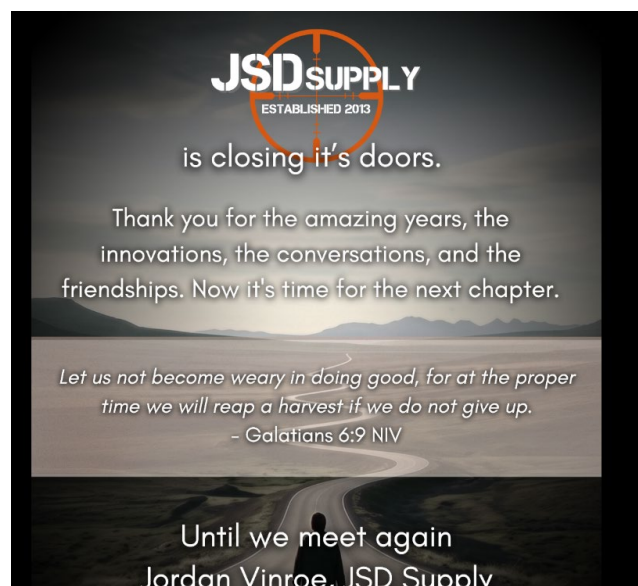
203. Vinroe appears to have directly adopted Eagle's website design and layout features into Eastern Gun Expo's website, and to have imported much of Eagle's website content to Eastern Gun Expo's website, including entire blog articles and "Frequently Asked Questions."

204. Vinroe appears to have used his email marketing lists from his Eagle and JSD businesses to market these "Eastern Gun Expo" gun shows.

205. Vinroe has been present at Eastern Gun Expo events. At the popular June 5 Oaks, PA show, Vinroe was observed at the doors, working and directing the show.

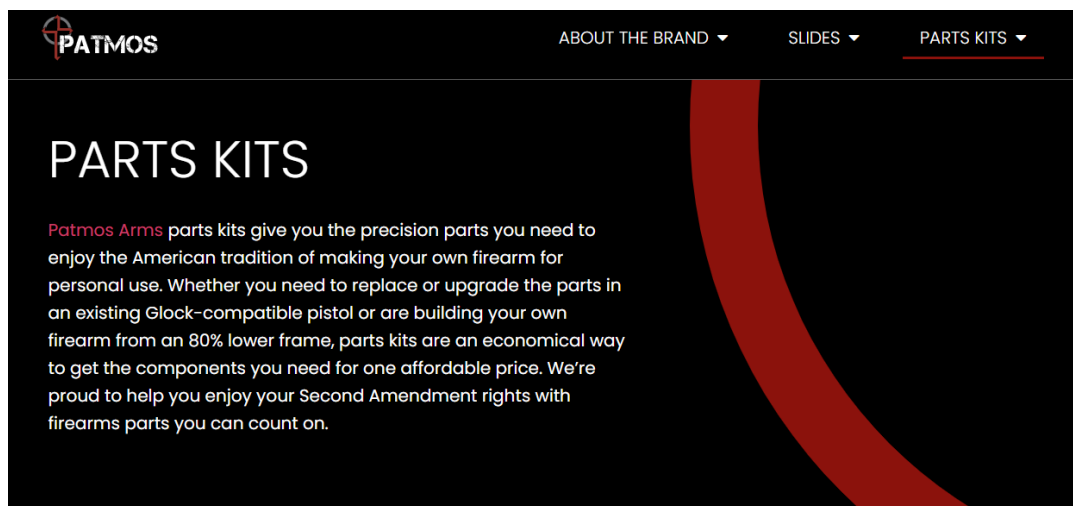
2. Vinroe Continues to Retail.

206. Vinroe's JSD website now states: "JSD Supply is closing it's [sic] doors. . . . Now it's time for the next chapter. Until we meet again, Jordan Vinroe, JSD Supply."



207. Whatever Vinroe meant by “next chapter,” at least three additional Vinroe retail brands maintain active websites today.

208. First, through his Patmos Arms brand, Vinroe continues to market “parts kits” designed for people to complete Ghost Guns so long as they have a Ghost Gun Frame available:



209. Second, through his PR Triggers brand, Vinroe continues to make and sell his Pull-Release Trigger. The homepage of the website prtriggers.com declares: “More Bang Bang for your Buck,” “Have more fun with a drop-in pull release trigger on your Glock-type pistol!”, and “A

Trigger So Nice It Fires Twice.”⁶⁷ The product page for the Model G Pull Release Trigger explains: “Engineered to fire a round as you pull the trigger, then again as you release your pull, this effectively doubles your rate of fire while allowing you to maintain a stable sight picture.”⁶⁸

210. Third, through his Gideon Optics brand, Vinroe continues to make and sell his firearm scopes product line. On information and belief, Vinroe ships Gideon Optics products directly to New Jersey consumers.

C. Vinroe’s Own Supporters Say He Seeks to Continue His Business While Dodging Litigation.

211. Vinroe has repeatedly relied upon podcast host John Crump to help promote his positions or his products.

212. In December 2020, it was on Crump’s show that Vinroe claimed to be the largest retailer of Ghost Gun Frames for handguns in the country.⁶⁹

213. In March 2021, Vinroe enlisted Crump in helping to get Eagle’s prior operators to backtrack on their short-lived prohibition Ghost Gun Kit sales at Eagle gun shows. Vinroe issued a press release explaining how “John Crump has spearheaded the investigation into the details of this situation, and has worked tirelessly to maintain and disperse factual information.”⁷⁰

214. In December 2021, Crump promoted Vinroe’s takeover of the Eagle gun shows and synthesis of the Eagle and JSD businesses.

⁶⁷ PR Triggers, <https://prtriggers.com/> (last visited July 14, 2026).

⁶⁸ PR Triggers, <https://prtriggers.com/product/model-g-pull-release-trigger/> (last visited July 14, 2016).

⁶⁹ John Crump Live, Fireside Chats 154: Jordan Vinroe - JSD Supply, at 27:40 (Dec. 16, 2020), <https://podcast.crumpy.com/e/fireside-chats-154-jordan-vinroe-jsd-supply-more-p80-information>.

⁷⁰ Jordan Vinroe, Public Statement from JSD Supply Owner to Current & Future Customers, JSD Supply (Mar. 18, 2021), https://www.jsdsupply.com/wp-content/uploads/2021/03/JSD-Press-Release-_3.18.21.pdf.

215. And in 2022, after NBC News ran its segment on making an undercover buy from Vinroe's salesperson and included an interview with Vinroe, Crump wrote an article protesting NBC's "hit piece" on JSD Supply and its owner, his friend, Jordan Vinroe.⁷¹

216. Most recently, on May 6, 2026, the day that Vinroe's JSD website announced the closing of the JSD business, Crump posted a "breaking news" video to YouTube. "It is true," Crump said, "we talked to Jordan."

217. According to Crump, Vinroe put JSD's holding company into bankruptcy because "they are getting killed with legal bills." "There are a lot of people that 3D-print guns, but I don't think there's enough people that 3-D print guns to offset not only their legal cost but their cost of operations"

218. Crump explained, however, that JSD's closure was part of a broader strategy for Vinroe's businesses to succeed: "Jordan Vinroe, Saint Vinroe, owns multiple businesses and they need to keep all those multiple businesses afloat. Sometimes you need to cut off a limb for the body to survive."⁷² "With JSD Supply closed down, they can redirect the money they weren't taking in—because most of the money's going to legal fees—to Gideon Optics and other entities that are more profitable."

219. Crump continued: "they're just doing it through different companies." "The other entities are still up and running. . . . Eagle Shows and everything else It's just JSD, all the other companies are running full steam ahead."

⁷¹ John Crump, NBC News Airs Hit Piece On JSD Supply & Jordan Vinroe, Ammoland (Mar. 21, 2022), <https://www.ammoland.com/2022/03/nbc-news-air-hit-piece-on-jsd-supply-and-jordan-vinroe/>.

⁷² John Crump News, Breaking: JSD Supply Shuts Down, at 3:02 (YouTube, May 5, 2026), https://www.youtube.com/watch?v=4UTIWj_0gKI&t=125s.

220. Crump’s disclosures confirm what Vinroe’s conduct in the months since the bankruptcy filing already establish—that Vinroe’s retail and gun show businesses continue notwithstanding the bankruptcy filings of Not An LLC and Patriot Enterprises Worldwide LLC. As Crump’s comments underscore, Vinroe filed for bankruptcy to frustrate the Attorney General’s efforts to stop and remediate his misconduct. They show that Vinroe continues his unlawful activities directed at New Jersey and its citizens. As Crump said, Vinroe’s core business continues to operate. It, therefore, continues to harm New Jersey residents.

CAUSES OF ACTION

Count One

(Contribution to Public Nuisance by Conduct Unlawful in Itself) (Public Law 2022, c. 56, N.J.S.A. 2C:58-35(a)(1))

221. The Attorney General repeats and realleges the foregoing allegations as if set forth in their entirety herein.

222. The Attorney General brings this count pursuant to N.J.S.A. 2C:58-35.

223. Under Section 58-35(a)(1), “[a] gun industry member shall not, by conduct [] unlawful in itself . . . , knowingly or recklessly create, maintain, or contribute to a public nuisance in this State through the sale, manufacturing, distribution, importing, or marketing of a gun-related product.”

224. A “[g]un industry member’ means a person engaged in the sale, manufacturing, distribution, importing, or marketing of a gun-related product, and any officer, agent, employee, or other person authorized to act on behalf of that person or who acts in active concert or participation with one or more such persons.” N.J.S.A. 2C:58-34. A “[p]erson’ means any natural person, firm, corporation, company, partnership, society, joint stock company, or any other entity or association.” Id.

225. Vinroe is a gun industry member within the meaning of Sections 58-34 and 58-35. Through JSD, his gun shows, and his other businesses, Vinroe is or has been (a) personally engaged in the sale, manufacturing, distribution, and marketing of gun-related products; (b) an officer and agent of companies engaged in the sale, manufacturing, distribution, and marketing of gun-related products; and (c) acted in active concert or participation with persons engaged in the sale, manufacturing, distribution, importing, or marketing of a gun-related product.

226. “‘Gun-related product’ means any firearm, ammunition, ammunition magazine, firearm component or part including, but not limited to, a firearm frame and a firearm receiver, or firearm accessory . . . which product was possessed in this State and as to which it was reasonably foreseeable that the product would be possessed or used in this State.” N.J.S.A. 2C:58-34.

227. Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts sold by or through Vinroe and his companies to New Jersey purchasers are gun-related products within the meaning of Sections 58-34 and 58-35.

228. Vinroe’s conduct has been “unlawful in itself.” He has knowingly agreed to aid (and has actually aided) New Jersey residents’ illegal possession of Ghost Guns, and Ghost Gun Kits and Ghost Gun Frames to make Ghost Guns. He has knowingly agreed to solicit (and has actually solicited) New Jersey residents’ illegal possession of Ghost Guns, Ghost Gun Kits, and Ghost Gun Frames to make Ghost Guns. He has done so for the purpose of promoting or facilitating New Jersey residents’ illegal possession of Ghost Guns, as well as of Ghost Gun Kits and Ghost Gun Frames to make Ghost Guns.

229. Vinroe’s conduct aids, facilitates, promotes, solicits, and participates in violations of N.J.S.A. 2C:39-3(n), 2C:39-9(k), and 2C:39-9(n), and is itself in violation of these provisions. See N.J.S.A. 2C:2-6.

230. Vinroe's conduct is also unlawful in itself in that he has knowingly agreed to aid (and has actually aided) and knowingly agreed to solicit (and has actually solicited) New Jersey residents' illegal possession of Large Capacity Magazines. He has done so for the purpose of promoting or facilitating such illegal possession. See N.J.S.A. 2C:39-3(j), 2C:2-6.

231. Vinroe's conduct is further unlawful in itself because he has knowingly caused illegal machine guns to be manufactured through his sale of pull-release triggers. See N.J.S.A. 2C:39-9(a). By the same conduct, Vinroe has knowingly facilitated the possession of illegal machine guns. See N.J.S.A. 2C:39-5(a), 2C:2-6. Under New Jersey law, "'Machine gun' means any firearm, mechanism or instrument not requiring that the trigger be pressed for each shot[.]" See N.J.S.A. 2C:39-1(i).

232. Vinroe's unlawful conduct consists of knowing acts or omissions that constitute knowing violations of N.J.S.A. 2C:58-35(a)(1), 2C:39-3(n), 2C:39-9(a), 2C:39-9(k), 2C:39-9(n), and 2C:39-3(j).

233. Vinroe's unlawful conduct in connection with the sale or distribution of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts has knowingly or recklessly created, maintained, or contributed to a public nuisance within the meaning of Section 58-35(a)(1). "'Public nuisance' means any condition which injures, endangers, or threatens to injure or endanger or contributes to the injury or endangerment of the health, safety, peace, comfort, or convenience of others or which otherwise constitutes a public nuisance under common law." N.J.S.A. 2C:58-34.

234. Because of Vinroe, Ghost Guns increasingly proliferated in New Jersey, including among persons prohibited from purchasing or possessing a firearm on the basis of a prior criminal conviction or other disqualifier, or who hope to avoid or impede law enforcement.

235. This condition injures and endangers the health, safety, peace, comfort, and convenience of New Jersey residents; threatens to injure and endanger the health, safety, peace, comfort, and convenience of New Jersey residents; and contributes to the injury and endangerment of the health, safety, peace, comfort, and convenience of New Jersey residents. Vinroe has created, maintained, and/or contributed to this condition, and he has done so knowingly or recklessly.

236. Vinroe's violation of Section 58-35(a) entitles the Attorney General to "an injunction prohibiting [Vinroe] from continuing that conduct or engaging therein or doing any acts in furtherance thereof." N.J.S.A. 2C:58-35(b). Such injunctive relief is necessary here to prevent further, continuing, and irreparable injury.

237. The Attorney General is likewise entitled to an order providing for abatement of the nuisance(s) at Vinroe's expense.

238. The Attorney General is further entitled to recover restitution, damages, reasonable attorneys' fees, filing fees, reasonable costs of suit, and any other appropriate relief. See N.J.S.A. 2C:58-35(b).

239. Vinroe's unlawful actions and/or omissions were undertaken with actual malice or accompanied by wanton and willful disregard of persons who foreseeably might be harmed by those actions or omissions, within the meaning of the Punitive Damages Act, N.J.S.A. 2A:15-5.12. He is therefore liable for punitive damages.

Count Two

(Contribution to Public Nuisance by Conduct Unreasonable Under the Circumstances) (Public Law 2022, c. 56, N.J.S.A. 2C:58-35(a)(1))

240. The Attorney General repeats and realleges the foregoing allegations as if set forth in their entirety herein.

241. The Attorney General brings this count pursuant to N.J.S.A. 2C:58-35(a)(1).

242. Under Section 58-35(a)(1), “[a] gun industry member shall not, by conduct . . . unreasonable under all the circumstances, knowingly or recklessly create, maintain, or contribute to a public nuisance in this State through the sale, manufacturing, distribution, importing, or marketing of a gun-related product.”

243. Vinroe’s conduct in connection with the sale or distribution of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts, and in facilitating the same, is unreasonable under all the circumstances. See N.J.S.A. 2C:58-35(a)(1).

244. Vinroe’s unreasonable conduct consists of knowing acts or omissions that constitute knowing violations of N.J.S.A. 2C:58-35(a)(1), 2C:39-3(n), 2C:39-9(a), 2C:39-9(k), 2C:39-9(n), and/or 2C:39-3(j).

245. Vinroe’s conduct in connection with the sale and distribution of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts—including Large Capacity Magazines and Pull-Release Triggers—has knowingly and/or recklessly created, maintained, or contributed to a public nuisance in New Jersey, within the meaning of Section 58-35(a)(1). “‘Public nuisance’ means any condition which injures, endangers, or threatens to injure or endanger or contributes to the injury or endangerment of the health, safety, peace, comfort, or convenience of others or which otherwise constitutes a public nuisance under common law.” See N.J.S.A. 2C:58-34.

246. As a result of Defendants’ actions, New Jersey has expended additional resources to deter, interdict, and mitigate crime effectuated or compounded by Ghost Guns. Specifically, and among other things, New Jersey has incurred damages in the form of additional compensation to law enforcement officials, the hiring of additional law enforcement officials, increased crime lab and ballistics costs, and other costs to enforce the laws Defendants have undermined, as well as increased public health costs, mental health costs, educational costs, business loss, and other costs

to the State resulting from Ghost Gun violence and the threat thereof, and of other Ghost Gun–adjacent crime and the threat thereof.

247. Vinroe’s conduct in violation of Section 58-35(a) entitles the Attorney General to “an injunction prohibiting [Vinroe] from continuing that conduct or engaging therein or doing any acts in furtherance thereof.” See N.J.S.A. 2C:58-35(b). Such injunctive relief is necessary here to prevent further, continuing, and irreparable injury.

248. The Attorney General is likewise entitled to an order providing for abatement of the nuisance(s) at Vinroe’s expense.

249. The Attorney General is further entitled to recover restitution, damages, reasonable attorneys’ fees, filing fees, reasonable costs of suit, and any other appropriate relief. See N.J.S.A. 2C:58-35(b).

250. Vinroe’s unreasonable actions and/or omissions were undertaken with actual malice or accompanied by wanton and willful disregard of persons who foreseeably might be harmed by those actions or omissions, within the meaning of the Punitive Damages Act, N.J.S.A. 2A:15-5.12. He is therefore liable for punitive damages.

Count Three

(Failure to Establish, Implement, and Enforce Reasonable Controls) (Public Law 2022, c. 56, N.J.S.A. 2C:58-35(a)(2))

251. The Attorney General repeats and realleges the foregoing allegations as if set forth in their entirety herein.

252. The Attorney General brings this count pursuant to N.J.S.A. 2C:58-35(a)(2).

253. Under Section 58-35(a)(2), “a gun industry member shall establish, implement, and enforce reasonable controls regarding its manufacture, sale, distribution, importing, and marketing of gun-related products.”

254. “Reasonable controls” means “reasonable procedures, safeguards, and business practices that are designed to,” *inter alia*:

(1) prevent the sale or distribution of a gun-related product to a straw purchaser, a firearm trafficker, a person prohibited from possessing a firearm under State or federal law, or a person who the gun industry member has reasonable cause to believe is at substantial risk of using a gun-related product to harm themselves or unlawfully harm another or of unlawfully possessing or using a gun-related product;

...

(3) ensure that a gun industry member complies with all provisions of State and federal law and does not otherwise promote the unlawful sale, manufacture, distribution, importing, marketing, possession, or use of a gun-related product.”

See N.J.S.A. 2C:58-34.

255. Vinroe has failed to “establish, implement, and enforce reasonable controls regarding [his] manufacture, sale, distribution, . . . and marketing” of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts—including Large Capacity Magazines and Trigger-Pull Releases—in at least three respects:

a. First, Vinroe has failed to establish, implement, and enforce “reasonable procedures, safeguards, and business practices that are designed to . . . prevent the sale or distribution of a gun-related product to a straw purchaser... a person prohibited from possessing a firearm under State [] law, or a person who the gun industry member has reasonable cause to believe is at substantial risk of using a gun-related product to harm themselves or unlawfully harm another or of unlawfully possessing or using a gun-related product.”

b. Second, Vinroe has failed to establish, implement, and enforce “reasonable procedures, safeguards, and business practices that are designed to . . . ensure that [] gun industry member[s] compl[y] with all provisions of State [] law[.]”

c. Third, Vinroe has failed to establish, implement, and enforce “reasonable procedures, safeguards, and business practices that are designed to . . . ensure that [] gun-industry member[s] . . . do[] not otherwise promote the unlawful sale, manufacture, distribution, [] marketing, possession, and use of a gun-related product.”

256. Vinroe’s failures to establish, implement, and enforce reasonable controls arise from knowing acts or omissions that constitute knowing violations of N.J.S.A. 2C:58-35(a)(2), 2C:39-3(n), 2C:39-9(a), 2C:39-9(k), 2C:39-9(n), 2C:39-3(j), and N.J.S.A. 2C:39-5(a).

257. Vinroe’s conduct in violation of Section 58-35(a) entitles the Attorney General to “an injunction prohibiting [Defendants] from continuing that conduct or engaging therein or doing any acts in furtherance thereof.” See N.J.S.A. 2C:58-35(b). Such injunctive relief is necessary here to prevent further, continuing, and irreparable injury.

258. The Attorney General is likewise entitled to an order providing for abatement of the nuisance(s) at Vinroe’s expense.

259. The Attorney General is further entitled to recover restitution, damages, reasonable attorneys’ fees, filing fees, reasonable costs of suit, and any other appropriate relief. See N.J.S.A. 2C:58-35(b).

260. Vinroe’s actions and/or omissions in violation of Section 58-35(a)(2) were undertaken with actual malice or accompanied by wanton and willful disregard of persons who foreseeably might be harmed by those actions or omissions, within the meaning of the Punitive Damages Act, N.J.S.A. 2A:15-5.12. He is therefore liable for punitive damages.

Count Four

(Common Law Public Nuisance)

261. The Attorney General repeats and realleges the foregoing allegations as if set forth in their entirety herein.

262. The Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts (including Large Capacity Magazines and Pull-Release Triggers) sold by or through Vinroe to New Jersey purchasers are designed to be made and assembled into completed Ghost Guns. Vinroe knew this when he sold, distributed, marketed, and promoted Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts or facilitated the foregoing.

263. The sale, distribution, marketing, and promotion of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts attract buyers who: (a) are prohibited from purchasing or possessing a firearm under New Jersey law, including on the basis of a prior criminal conviction or other dangerousness that disqualifies them from gun ownership; (b) hope to avoid or impede law enforcement investigation of guns, gun violence, or gun crime by using untraceable firearms; and/or (c) intend to traffic, sell, or similarly distribute Ghost Guns, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to persons who meet the description of (a) or (b). Vinroe knew this and sought to profit from it.

264. Vinroe has failed to take meaningful steps to avoid selling Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to such purchasers at gun shows, or to avoid facilitating the foregoing. To the contrary, he has endeavored to remove barriers at gun shows to such sales.

265. New Jersey has, for years, banned the possession of Ghost Guns and of Ghost Gun Kits and Ghost Gun Frames to make Ghost Guns. N.J.S.A. 2C:39-3(n), 2C:39-9(k), 2C:39-9(n). Vinroe knows this.

266. New Jersey prohibits persons who are subject to various statutory disqualifications from possessing any firearm. These include persons who, for example, have prior criminal convictions, are minors, or have been determined to pose a risk to themselves or others. Vinroe knows this.

267. New Jersey prohibits persons from purchasing a firearm without acquiring a handgun purchase permit or FPIC, and New Jersey subjects the availability of the purchase permit or FPIC to background checks in order to screen out persons who are statutorily disqualified from possessing a firearm. Vinroe knows this.

268. Vinroe understands New Jersey's Ghost Gun and other firearms laws to be more "restrictive" than those of Pennsylvania. Yet Vinroe has failed to take reasonable measures to prevent or avoid the sale of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to New Jersey residents or to others whom they have reason to know would likely be possessing, assembling, and/or using them in New Jersey.

269. Rather, Vinroe has treated perceived differences between Pennsylvania law and New Jersey law as a business opportunity, and specifically targeted New Jersey customers for such transactions.

270. Vinroe, individually, as a sole proprietor, and in connection with companies that he managed and controlled, has sold, or facilitated the sale of, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to New Jersey residents at Eagle and "Eastern Gun Expo" gun shows near the New Jersey border. He did so while knowing that: (a) such items were likely to be brought into the State of New Jersey in violation of New Jersey laws, including N.J.S.A. 2C:39-9(k); (b) many such items would be assembled into or used to assemble a completed Ghost Gun that would be possessed in or transported into New Jersey in violation of N.J.S.A. 2C:39-3(n) and/or N.J.S.A. 2C:39-9(n); and (c) Ghost Guns, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts are particularly attractive to persons who are prohibited from purchasing or possessing a firearm on the basis of a prior criminal conviction or other dangerousness that disqualifies them from gun

ownership, or who hope to avoid or impede law enforcement investigations of criminal activity by using untraceable firearms.

271. New Jersey residents (and others) have purchased Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts from JSD or from other vendors at Vinroe's gun shows and unlawfully brought such items into New Jersey. A material number of those individuals have then unlawfully resold or distributed such items, or used such items to assemble Ghost Guns for their own unlawful possession or to unlawfully sell or distribute Ghost Guns. All of this was known by or reasonably foreseeable to Vinroe.

272. Vinroe's sale of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts has contributed and contributes to gun violence and crime in New Jersey. This is because, among other things, Vinroe: (a) has sold or facilitated the sale of, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to individuals ineligible to purchase or possess a gun under New Jersey law as a matter of public safety, such as individuals convicted of serious or dangerous crimes; (b) has sold or facilitated the sale of, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to individuals who then distribute such products or finished Ghost Guns to persons who are ineligible for gun possession in New Jersey; (c) has sold or facilitated the sale of, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to individuals who may be eligible to be licensed for gun ownership or purchase, but seek an unlicensed and illegal gun to avoid or impede law enforcement investigation of gun violence or criminal activity by using untraceable firearms; and (d) has sold or facilitated the sale of, Ghost Gun Kits, Ghost Gun Frames, and Ghost Gun Parts which, if used by anyone in the context of a crime or other incident, could not be traced by law enforcement, thus thwarting New Jersey's regulatory scheme designed to protect public health and safety.

273. Vinroe's sale, or facilitation of the sale, of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts unreasonably interferes with the right, common to the people of New Jersey, to be free of the dangers posed by Ghost Guns. Vinroe's actions significantly interfere with the public health, the public safety, the public peace, the public comfort, and the public convenience of New Jersey residents.

274. Vinroe has known or had reason to know that his conduct has a significant effect on the right of New Jersey residents to be free of the dangers posed by Ghost Guns.

275. Vinroe's conduct at issue is proscribed by New Jersey state law banning New Jersey residents from possessing Ghost Guns, Ghost Gun Kits, Ghost Gun Frames to make Ghost Guns, Large Capacity Magazines, and machine guns. Vinroe knows that such possession is illegal in New Jersey, yet has knowingly contributed to, and aided and abetted, such criminal activity by selling, and/or facilitating the sale of, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to New Jersey residents and others he has reason to know are likely to enter New Jersey.

276. Since July 2022, New Jersey has required gun industry members to establish, implement, and enforce "reasonable controls" regarding their manufacture, sale, distribution, and marketing of all gun-related products, which Vinroe failed and still fails to do.

277. Vinroe's conduct is of a continuing nature and has produced a permanent or long-lasting effect, which includes increased violence, injury, legitimate fear of violence, and inability to enjoy public peace, comfort, and convenience, suffered on the part of New Jersey residents.

278. New Jersey law regulates Vinroe's personal conduct and makes it tortious. To the extent that any of the foregoing tortious conduct was committed by or through Not An LLC, Patriot

Enterprises Worldwide LLC, or one of Vinroe's other entities, Vinroe is personally and directly liable under the participation theory.⁷³

279. Vinroe's conduct consists of knowing acts or omissions that constitute knowing violations of N.J.S.A. 2C:58-35(a)(1), 2C:39-3(n), 2C:39-9(a), 2C:39-9(k), 2C:39-9(n), and 2C:39-3(j).

280. The Attorney General has the legal right to remedy a public nuisance by virtue of her police power. This includes seeking relief to cease and abate that nuisance and/or fund the cost of abatement.

281. Injunctive relief is necessary to prevent continuing injury. These injuries, including increased violence and the legitimate fear of violence, are irreparable and cannot be remedied by monetary relief alone.

Count Five **(Negligence)**

282. The Attorney General repeats and realleges the foregoing allegations as if set forth in their entirety herein.

283. At all relevant times, Vinroe knew or should have known that the Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to make Ghost Guns sold by JSD and/or sold at his Eagle gun shows were being sold to New Jersey residents, or to others likely to take such items to New Jersey, where many would sell them or completed Ghost Guns to secondary purchasers based in New Jersey.

284. At all relevant times, Vinroe owed the State of New Jersey and its residents a duty to exercise reasonable care and not expose others to foreseeable risks of injury.

⁷³ See Saltiel v. GSI Consultants, Inc., 170 N.J. 297, 303 (2002).

285. Vinroe knew or should have known that the Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to make Ghost Guns he intended for sale would attract buyers who: (a) are prohibited from purchasing or possessing a firearm, including on the basis of a prior conviction for serious or dangerous crimes or other dangerousness that disqualifies them from gun ownership; (b) hope to avoid or impede law enforcement investigation of guns, gun violence, or gun crime by using untraceable firearms; and/or (c) intend to traffic, sell, or similarly distribute Ghost Guns, Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to persons who meet the description of (a) or (b) above.

286. Vinroe knew or should have known that such persons are likely to use those Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to make Ghost Guns in a manner that is dangerous to the public, or to provide such products or completed Ghost Guns to secondary persons who are likely to use such products in a manner that is dangerous to the public.

287. Vinroe further knew or should have known that selling or facilitating the sale of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to make Ghost Guns to any New Jersey resident would foreseeably harm New Jersey residents and the State because, amongst other things, Ghost Guns are far more difficult to police, regulate, and trace.

288. Vinroe knew or should have known that his conduct in selling or facilitating the sale of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts to make Ghost Guns would foreseeably harm New Jersey residents and the State of New Jersey.

289. Vinroe's duties are further informed by New Jersey laws prohibiting the possession, assembly, and/or transport of Ghost Guns, Ghost Gun Kits, and Ghost Gun Frames. These laws are intended to curb violent gun crime, prevent access to guns by persons prohibited from possessing them, and protect public safety in New Jersey.

290. Vinroe breached his duty of reasonable care to New Jersey residents and the State of New Jersey by selling or facilitating the sale of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts without adequate or reasonable procedures or restraints, as alleged herein.

291. Vinroe knew or should have known that his conduct in selling or facilitating the sale of Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts would result in substantial injuries and damages in New Jersey, including gun violence, gun crime, and other crime caused by Ghost Guns made from Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts.

292. Vinroe's negligence has proximately harmed and continues to harm New Jersey residents, including through harm to gun violence victims injured by his purchasers (or secondary purchasers) using his Ghost Gun products. Vinroe's negligence has furthermore proximately and foreseeably caused the State of New Jersey to expend excess monies for police (including overtime), laboratory costs, emergency services, coroner and morgue services, pension benefits, health care, social services, and other necessary facilities and services.

293. With respect to such negligent conduct on the part of legal entities controlled by Vinroe, Vinroe is or was sufficiently involved in the commission of the tort to be personally liable himself.

294. Vinroe's negligent conduct consists of knowing acts or omissions that constitute knowing violations of N.J.S.A. 2C:58-35(a)(1), 2C:39-3(n), 2C:39-9(a), 2C:39-9(k), 2C:39-9(n), and 2C:39-3(j).

295. The Attorney General seeks appropriate remedies on behalf of the State and in the Attorney General's parens patriae capacity for the benefit of the general public and as are necessary to protect the safety, health, and welfare of New Jersey's residents.

296. Vinroe's negligent actions and/or omissions were undertaken with actual malice or accompanied by wanton and willful disregard of persons who foreseeably might be harmed by those actions or omissions, within the meaning of the Punitive Damages Act, N.J.S.A. 2A:15-5.12. Vinroe is therefore liable for punitive damages.

Count Six
(Negligent Entrustment)

297. The Attorney General repeats and realleges the allegations of the above paragraphs as if set forth at length herein.

298. At all relevant times, Vinroe owed New Jersey residents and the State a duty of care as set forth herein.

299. The Ghost Gun Kits, Ghost Gun Frames, and other Ghost Gun Parts sold by JSD or otherwise sold at Vinroe's gun shows to New Jersey purchasers were dangerous instrumentalities that Vinroe knowingly placed into the hands of New Jersey residents and others likely to possess them in New Jersey or provide them to secondary persons in New Jersey.

300. Vinroe had reason to know that this conduct entrusted dangerous instrumentalities to persons who were incompetent, unfit, inexperienced, and/or reckless in possession of such instrumentalities, and/or were prohibited by New Jersey law from possessing such dangerous instrumentalities.

301. On information and belief, such individuals have foreseeably used Vinroe's products to injure and/or kill New Jersey residents or others in the State of New Jersey.

302. Such harms are to foreseeable victims and are the natural and proximate result of Vinroe's behavior.

303. Vinroe has proximately harmed and continues to harm New Jersey residents, including through harm to gun violence victims injured by his purchasers (or secondary purchasers) using his Ghost Gun products.

304. Vinroe's negligent entrustment consists of knowing acts or omissions that constitute knowing violations of N.J.S.A. 2C:58-35(a)(1), 2C:39-3(n), 2C:39-9(k), 2C:39-9(n), and 2C:39-3(j).

305. The Attorney General seeks appropriate remedies on behalf of the State and in the Attorney General's parens patriae capacity for the benefit of the general public and as are necessary to protect the safety, health, and welfare of New Jersey's residents.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff the Attorney General of the State of New Jersey respectfully requests judgment in her favor and against Jordan Vinroe as follows:

- A. Ordering injunctive relief as is necessary to prevent continuing harm;
- B. Ordering him to pay accrued and future costs that the State of New Jersey and any other person or entity incurs in abating the public nuisances that he has created, maintained, or contributed to;
- C. Awarding the Attorney General monetary damages and punitive damages in an amount to be determined at trial, including interest thereon;
- D. Awarding the Attorney General unjust enrichment and other restitution in an amount to be determined at trial;
- E. Awarding the Attorney General all costs and expenses incurred in connection with this action, including attorneys' fees; and
- F. Awarding the Attorney General such other and further relief as the Court deems just and proper.

Dated: July 15, 2026
Newark, New Jersey

JENNIFER DAVENPORT
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

By: /s/ David Leit
David Leit [024351995]
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CERTIFICATION OF RELATED ACTIONS

In accordance with R. 4:5-1(b)(2) I certify that the underlying facts of the matter in controversy in this lawsuit are in large part the same as the underlying facts of the matter in controversy in the Attorney General's separate lawsuit against Not An LLC and Patriot Enterprises Worldwide LLC, Davenport v. Patriot Enterprises Worldwide LLC d/b/a Eagle Shows and Not An LLC d/b/a JSD Supply (N.J. Super. Ct. No. MER-C-93-23). The Attorney General's claims against Vinroe are therefore subject to permissive joinder under R. 4:29-1(b).

The Attorney General opposes permissive joinder by order of the Court because under the present circumstances, joinder of the bankrupt entities Patriot Enterprises Worldwide LLC and Not an LLC would not promote the interests of judicial economy, or of the non-parties, or of the named parties here.

JENNIFER DAVENPORT
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

By: /s/ David Leit
David Leit
Assistant Attorney General

Dated: July 15, 2026
Newark, New Jersey

CERTIFICATION OF COMPLIANCE

I certify that confidential personal identifiers will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b).

JENNIFER DAVENPORT
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

By: /s/ David Leit
David Leit
Assistant Attorney General

Dated: July 15, 2026
Newark, New Jersey

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Assistant Attorney General David Leit is hereby designated as trial counsel on behalf of the Plaintiff.

JENNIFER DAVENPORT
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiff

By: /s/ David Leit
David Leit
Assistant Attorney General

Dated: July 15, 2026
Newark, New Jersey