

RETURN DATE: APRIL 18, 2023 : SUPERIOR COURT
ESTATE OF NEVEN STANIŠIĆ ET AL. : J.D. OF STAMFORD
V. : AT STAMFORD
STURM, RUGER & COMPANY, INC. : MARCH 22, 2023

COMPLAINT

COUNT ONE: General Statutes § 52-555 Wrongful Death / Violation of Connecticut Unfair Trade Practices Act (Estate of Neven Stanišić v. Sturm, Ruger & Company, Inc.)

1. This is a civil action for damages and injunctive relief stemming from the shooting at King Soopers supermarket in Boulder, Colorado on March 22, 2021.
2. Defendant Sturm, Ruger & Company, Inc. (hereinafter “Ruger”), also known as B.F.I. and B.F.I., Inc., is a Connecticut corporation created in 1969 and located in Southport, Connecticut. At all relevant times, Ruger manufactured, marketed and sold AR-556s.
3. At all relevant times, Ruger International, LLC manufactured, marketed and sold AR-556s.
4. Upon information and belief, Ruger manufactured the AR-556 that was used in the shooting at King Soopers supermarket on March 22, 2021, resulting in the deaths of ten people, including Neven Stanišić.
5. At all relevant times, the plaintiff, Radmilo Stanišić, was the appointed Representative of the Estate of Neven Stanišić.

**RUGER’S MARKETING AND PROMOTION OF ITS
AR-556S VIOLATED THE CONNECTICUT UNFAIR TRADE PRACTICES ACT**

6. Ruger designed the AR-556 in 2014 as an entry-level AR-15 style rifle.
7. In the weeks leading up to the mass shooting at the King Soopers supermarket in Boulder, Colorado, Ruger marketed its AR-556 rifle with the following photograph:



8. The AR-556 was designed with features that were chosen to maximize casualties and engineered to deliver maximum carnage with extreme efficiency.
9. In 2019, Ruger designed a variant AR-556 “pistol” and marketed it in the weeks leading up to the mass shooting at the King Soopers supermarket in Boulder, Colorado with the following photograph:



10. The AR-556 pistol variant featured the same rail system as other AR-15 style rifles while having an altered barrel and stock to evade federal classification as a rifle.
11. Ruger designed the AR-556 such that it would utilize the same ammunition and magazines as the AR-15s.
12. As a result of Ruger’s design choice, the AR-556 is more deadly than other pistols on the market.
13. Ruger designed the AR-556 to be sold with stabilizing braces that essentially allowed the weapon to be converted to a rifle while still preserving its classification as a pistol for

regulatory purposes.

14. In the weeks before the shooting, Ruger marketed and sold the AR-556 pistol with a lower receiver “fitted with an adjustable SB Tactical® SBA3® Pistol Stabilizing Brace® to aid in accuracy, balance and recoil management.”
15. Ruger’s marketing and sale of the AR-556 pistol with stabilizing arm braces allowed its weapon to function as a stock-stabilized AR-15 rifle, while evading regulations targeted at limiting AR-15-style rifles.
16. AR-15s and AR-15-style weapons have become the weapon of choice for mass shooters and, since their introduction to the market, AR-15-style pistols, like the AR-556, have been used in several mass shootings, including the shooting that is the subject of this action.
17. Ruger marketed its AR-556s by promoting their militaristic and assaultive uses.
18. Ruger’s militaristic marketing promoted the image of its AR-556s as combat weapons used for the purpose of waging war and killing human beings.
19. Ruger’s marketing glorified the lone gunman.
20. Ruger’s marketing promoted lone gunman assaults.
21. Ruger’s marketing materials include such phrases as: “Anything else would be un-American.”
22. Ruger promoted its brand to children, including acting as a sponsor of Junior Shooters Magazine.
23. Ruger’s marketing glorified the military design, functionality and appearance of its AR-556s.
24. Ruger’s marketing promoted its AR-556s for mass casualty assaults.
25. Ruger marketed its AR-556 as an affordable, “entry-level” AR-15-style weapon.
26. Ruger’s marketing promoted criminal use of its AR-556s by its target market.

27. Ruger marketed its AR-556s knowing that they would be accessed by unscreened consumers.
28. Ruger continued to market AR-556s in the manner set forth in this complaint despite evidence of their increasing use in mass shootings.
29. Ruger continued to market AR-556s in the wake of the Sandy Hook Elementary School shooting and during the subsequent litigation involving Remington's similar marketing of AR-15-style weapons in the lead up to that shooting.
30. As a result of its marketing campaigns, Ruger's gross earnings from AR-15-style rifles nearly tripled from 2019 to 2021, increasing from \$39 million to over \$103 million.
31. Ruger marketed its AR-556s without regard for public safety.
32. Ruger's marketing was unethical.
33. Ruger's marketing was immoral.
34. Ruger's marketing was unscrupulous.
35. Ruger's marketing was oppressive.
36. Ruger's marketing was reckless.
37. Ruger marketed in the above manner directly and through third parties.
38. Ruger's conduct, as set forth above, occurred prior to and continued through March 22, 2021, and after.
39. Ruger's conduct as previously alleged, in whole or in part, constituted a knowing violation of the Connecticut Unfair Trade Practices Act, Connecticut General Statutes § 42-110a *et seq.*
40. Ruger's conduct as previously alleged was a substantial factor resulting in the injuries, suffering, and death of Neven Stanišić.

41. On March 22, 2021, Neven Stanišić suffered the following injuries and losses:

- a. terror;
- b. ante-mortem pain and suffering;
- c. destruction of the ability to enjoy life's activities;
- d. destruction of earning capacity; and
- e. death.

42. As a further result of Ruger's conduct, Neven Stanišić has been permanently deprived of his ability to carry on and enjoy life's activities and his earning capacity has been forever destroyed.

43. As a further result of Ruger's conduct, Neven Stanišić suffered great physical, mental and emotional suffering including the emotional distress with the contemplation of his death.

44. As a result of the injuries and death of Neven Stanišić, the Estate of Neven Stanišić incurred funeral expenses to its financial loss.

COUNT TWO: General Statutes § 52-555 Wrongful Death / Violation of Connecticut Unfair Trade Practices Act (Estate of Denny Stong v. Sturm, Ruger & Company, Inc.)

1. This is a civil action for damages and injunctive relief stemming from the shooting at King Soopers supermarket in Boulder, Colorado on March 22, 2021.
2. Defendant Sturm, Ruger & Company, Inc. (hereinafter "Ruger"), also known as B.F.I. and B.F.I., Inc., is a Connecticut corporation created in 1969 and located in Southport, Connecticut. At all relevant times, Ruger manufactured, marketed and sold AR-556s.
3. At all relevant times, Ruger International, LLC manufactured, marketed and sold AR-556s.
4. Upon information and belief, Ruger manufactured the AR-556 that was used in the shooting at King Soopers supermarket on March 22, 2021, resulting in the deaths of ten

people, including Denny Stong.

5. At all relevant times, the plaintiff, Lisa Allen, was the appointed Representative of the Estate of Denny Stong.
6. Paragraphs 6 through 39 of Count One are hereby incorporated and made corresponding paragraphs of this Count as if fully set forth herein.
40. Ruger's conduct as previously alleged was a substantial factor resulting in the injuries, suffering, and death of Denny Stong.
41. On March 22, 2021, Denny Stong suffered the following injuries and losses:
 - a. terror;
 - b. ante-mortem pain and suffering;
 - c. destruction of the ability to enjoy life's activities;
 - d. destruction of earning capacity; and
 - e. death.
42. As a further result of Ruger's conduct, Denny Stong has been permanently deprived of his ability to carry on and enjoy life's activities and his earning capacity has been forever destroyed.
43. As a further result of Ruger's conduct, Denny Stong suffered great physical, mental and emotional suffering including the emotional distress with the contemplation of his death.
44. As a result of the injuries and death of Denny Stong, the Estate of Denny Stong incurred funeral expenses to its financial loss.

COUNT THREE: General Statutes § 52-555 Wrongful Death / Violation of Connecticut Unfair Trade Practices Act (Estate of Lynn Murray v. Sturm, Ruger & Company, Inc.)

1. This is a civil action for damages and injunctive relief stemming from the shooting at King Soopers supermarket in Boulder, Colorado on March 22, 2021.

2. Defendant Sturm, Ruger & Company, Inc. (hereinafter “Ruger”), also known as B.F.I. and B.F.I., Inc., is a Connecticut corporation created in 1969 and located in Southport, Connecticut. At all relevant times, Ruger manufactured, marketed and sold AR-556s.
3. At all relevant times, Ruger International, LLC manufactured, marketed and sold AR-556s.
4. Upon information and belief, Ruger manufactured the AR-556 that was used in the shooting at King Soopers supermarket on March 22, 2021, resulting in the deaths of ten people, including Lynn Murray.
5. At all relevant times, the plaintiff, Olivia Mackenzie, was the appointed Representative of the Estate of Lynn Murray.
6. Paragraphs 6 through 39 of Count One are hereby incorporated and made corresponding paragraphs of this Count as if fully set forth herein.
40. Ruger’s conduct as previously alleged was a substantial factor resulting in the injuries, suffering, and death of Lynn Murray.
41. On March 22, 2021, Lynn Murray suffered the following injuries and losses:
 - a. terror;
 - b. ante-mortem pain and suffering;
 - c. destruction of the ability to enjoy life’s activities;
 - d. destruction of earning capacity; and
 - e. death.
42. As a further result of Ruger’s conduct, Lynn Murray has been permanently deprived of her ability to carry on and enjoy life’s activities and her earning capacity has been forever destroyed.
43. As a further result of Ruger’s conduct, Lynn Murray suffered great physical, mental and

emotional suffering including the emotional distress with the contemplation of her death.

44. As a result of the injuries and death of Lynn Murray, the Estate of Lynn Murray incurred funeral expenses to its financial loss.

COUNT FOUR: General Statutes § 52-555 Wrongful Death / Violation of Connecticut Unfair Trade Practices Act (Estate of Jody Waters v. Sturm, Ruger & Company, Inc.)

1. This is a civil action for damages and injunctive relief stemming from the shooting at King Soopers supermarket in Boulder, Colorado on March 22, 2021.
2. Defendant Sturm, Ruger & Company, Inc. (hereinafter “Ruger”), also known as B.F.I. and B.F.I., Inc., is a Connecticut corporation created in 1969 and located in Southport, Connecticut. At all relevant times, Ruger manufactured, marketed and sold AR-556s.
3. At all relevant times, Ruger International, LLC manufactured, marketed and sold AR-556s.
4. Upon information and belief, Ruger manufactured the AR-556 that was used in the shooting at King Soopers supermarket on March 22, 2021, resulting in the deaths of ten people, including Jody Waters.
5. At all relevant times, the plaintiffs, Charles Hunker and Corey Eheart, were the appointed Co-Representatives of the Estate of Jody Waters.
6. Paragraphs 6 through 39 of Count One are hereby incorporated and made corresponding paragraphs of this Count as if fully set forth herein.
40. Ruger’s conduct as previously alleged was a substantial factor resulting in the injuries, suffering, and death of Jody Waters.
41. On March 22, 2021, Jody Waters suffered the following injuries and losses:
 - a. terror;
 - b. ante-mortem pain and suffering;
 - c. destruction of the ability to enjoy life’s activities;

d. destruction of earning capacity; and

e. death.

42. As a further result of Ruger's conduct, Jody Waters has been permanently deprived of her ability to carry on and enjoy life's activities and her earning capacity has been forever destroyed.

43. As a further result of Ruger's conduct, Jody Waters suffered great physical, mental and emotional suffering including the emotional distress with the contemplation of her death.

44. As a result of the injuries and death of Jody Waters, the Estate of Jody Waters incurred funeral expenses to its financial loss.

COUNT FIVE: General Statutes § 52-555 Wrongful Death / Violation of Connecticut Unfair Trade Practices Act (Estate of Kevin Mahoney v. Sturm, Ruger & Company, Inc.)

1. This is a civil action for damages and injunctive relief stemming from the shooting at King Soopers supermarket in Boulder, Colorado on March 22, 2021.
2. Defendant Sturm, Ruger & Company, Inc. (hereinafter "Ruger"), also known as B.F.I. and B.F.I., Inc., is a Connecticut corporation created in 1969 and located in Southport, Connecticut. At all relevant times, Ruger manufactured, marketed and sold AR-556s.
3. At all relevant times, Ruger International, LLC manufactured, marketed and sold AR-556s.
4. Upon information and belief, Ruger manufactured the AR-556 that was used in the shooting at King Soopers supermarket on March 22, 2021, resulting in the deaths of ten people, including Kevin Mahoney.
5. At all relevant times, the plaintiff, Ellen Mahoney, was the appointed Representative of the Estate of Kevin Mahoney.
6. Paragraphs 6 through 39 of Count One are hereby incorporated and made corresponding paragraphs of this Count as if fully set forth herein.

40. Ruger's conduct as previously alleged was a substantial factor resulting in the injuries, suffering, and death of Kevin Mahoney.
41. On March 22, 2021, Kevin Mahoney suffered the following injuries and losses:
- a. terror;
 - b. ante-mortem pain and suffering;
 - c. destruction of the ability to enjoy life's activities;
 - d. destruction of earning capacity; and
 - e. death.
42. As a further result of Ruger's conduct, Kevin Mahoney has been permanently deprived of his ability to carry on and enjoy life's activities and his earning capacity has been forever destroyed.
43. As a further result of Ruger's conduct, Kevin Mahoney suffered great physical, mental and emotional suffering including the emotional distress with the contemplation of his death.
44. As a result of the injuries and death of Kevin Mahoney, the Estate of Kevin Mahoney incurred funeral expenses to its financial loss.

WHEREFORE, the plaintiffs claim:

1. Monetary damages;
2. Punitive damages;
3. Attorneys' fees;
4. Costs;
5. Such other relief as the court may deem appropriate.

THE PLAINTIFFS,



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STATEMENT OF AMOUNT IN DEMAND

The amount of money damages claimed is greater than Fifteen Thousand Dollars (\$15,000.00) exclusive of interest and costs.

THE PLAINTIFFS,



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