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UNITED STATES OF AMERICA
11

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF COLUMBIA**

14 UNITED STATES OF AMERICA,
15 Plaintiff,

16 v.

17 THE DISTRICT OF COLUMBIA,
CHIEF OF POLICE PAMELA
18 SMITH, in her official capacity as
Chief of the Metropolitan Police
19 Department of the District of
Columbia, the METROPOLITAN
20 POLICE DEPARTMENT OF THE
DISTRICT OF COLUMBIA.

21 Defendants.
22

Case No. ^^^^^^

COMPLAINT

23 Plaintiff, the United States of America, by and through its undersigned counsel,
24 hereby brings this action against defendants the District of Columbia, Chief of Police
25 Pamela Smith (“Chief Smith”), in her official capacity as Chief of the Metropolitan Police
26 Department of the District of Columbia, and the Metropolitan Police Department of the
27 District of Columbia (“MPD”) (collectively “DC Defendants”):
28

INTRODUCTION

1
2 1. On February 10, 2003, Dick Heller, an active-duty special policeman, sued
3 the local government of our Nation’s capital because the D.C. Code did not trust him to
4 possess a firearm in his home for self-defense. Five years later, the U.S. Supreme Court
5 found in favor of Mr. Heller and recognized that law-abiding citizens have the right to
6 possess arms protected under the Second Amendment inside the home for lawful purposes
7 such as self-defense. As the Court explained, the Second Amendment protects the right
8 to “keep and bear” those arms that are “in common use today.” *See New York State Rifle*
9 *& Pistol Ass’n, Inc. v. Bruen*, 597 U.S. 1, 47 (2022); *District of Columbia v. Heller*, 554
10 U.S. 570, 627 (2003).

11 2. Less than a year later, the Council of the District of Columbia (“Council”),
12 the governing body of our Nation’s capital, amended its broad gun possession registration
13 requirement to carve out—in response to *Heller*—a requirement that someone who is not
14 a registered gun owner may *only* possess a registered gun owner’s gun if that person would
15 otherwise qualify to register the gun, and *only if* that person reasonably believes that such
16 possession is necessary to prevent their imminent death or great bodily injury. *See* D.C.
17 Code § 7-2502.01(b)(4) (2023).

18 3. Over the years since *Heller*, the Council continued its efforts to infringe the
19 Second Amendment-protected “right of the people to keep and bear arms” through limiting
20 law-abiding citizens’ ability to register commonly used firearms and criminalizing the
21 possession of firearms that it refuses to register.

22 4. Specifically, the District denies law-abiding citizens the ability to register a
23 wide variety of commonly used semi-automatic firearms, such as the Colt AR-15 series
24 rifles, which is among the most popular of firearms in America, and a variety of other
25 semi-automatic rifles and pistols that are in common use. *See* D.C. Code § 7–2501.01.

26 5. Indeed, D.C.’s current semi-automatic firearms prohibition that bans many
27 commonly used pistols, rifles or shotguns is based on little more than cosmetics,
28 appearance, or the ability to attach accessories, and fails to take into account whether the

1 prohibited weapon is “in common use today” or that law-abiding citizens may use these
2 weapons for lawful purposes protected by the Second Amendment. *See Heller*, 554 U.S.
3 at 47. Therefore, the District’s restrictions lack legal basis.

4 6. Acting pursuant to the authority granted them by the D.C. Code governing
5 Washington, D.C., Chief Smith and the MPD enforce the provisions of the District of
6 Columbia Code. These provisions include the power to approve or deny certificates of
7 registration for firearms. Their decisions to deny certificates of registration for commonly
8 possessed semiautomatic firearms run afoul of binding Supreme Court precedent and
9 therefore trample the Second Amendment rights of law-abiding citizens.

10 7. This case concerns much more than dormant, bad law. It concerns the very
11 real requirement that the DC Defendants have acted and are continuing to act in blatant
12 disregard to our Constitution and the rulings of our Nation’s highest court.

13 8. The United States of America brings this lawsuit to protect the rights that
14 have been guaranteed for 234 years and which the Supreme Court has explicitly reaffirmed
15 several times over the last two decades.

16 **PARTIES**

17 9. Plaintiff is the United States of America.

18 10. Defendant Washington, D.C. is a governmental entity within the meaning of
19 34 U.S.C. § 12601, is responsible for funding Defendants Chief Smith and MPD, and is
20 responsible for its acts or omissions.

21 11. Defendant Chief Smith is the current Chief of Police for the MPD. In that
22 capacity, Chief Smith has the authority and obligation to enforce the laws of D.C. *See*
23 D.C. Code § 5-105.01. Additionally, the Chief or her designee promulgate rules or
24 regulations and implement gun registration and licensing within D.C. *See* D.C. Mun.
25 Regs. tit. 24, § 2305.1.

26 12. Defendant MPD is the law enforcement agency that enforces the laws within
27 Washington, D.C. *See* D.C. Code § 5–105.05. MPD serves as the gun registration and
28 licensing office for all applicants within Washington, D.C. *See* D.C. Mun. Regs. Tit. 24,

1 § 2305. Additionally, MPD has and exercises authority to arrest individuals committing
2 a violation of criminal law in their presence, including when in the home of a law-abiding
3 citizen who possesses an unregistered firearm, irrespective of whether the possession of
4 such a firearm is constitutionally protected under *Heller* and progeny. *See* D.C. Code §
5 23-581.

6 **JURISDICTION AND VENUE**

7 13. This Court has jurisdiction over this action under 28 U.S.C. §§ 1331,
8 1343(a)(3), and 1345.

9 14. The United States is authorized to initiate this action against all DC
10 Defendants and seek equitable and declaratory relief under the Violent Crime Control and
11 Law Enforcement Act of 1994, 34 U.S.C. § 12601(b).

12 15. Venue is proper in the Federal District of Columbia pursuant to 28 U.S.C.
13 §§ 1391(b)(1)-(2) because all DC Defendants carry out their duties and operations within
14 the District of Columbia, and the events, duties, obligations, or omissions giving rise to
15 this claim, including the continued authority and duty to fine or arrest law-abiding citizens
16 in violation of their Second Amendment rights, occurred and continue to occur within the
17 Federal District of Columbia.

18 **BACKGROUND**

19 16. Law-abiding citizens have a constitutional right to possess a “firearm in the
20 home operable for the purpose of immediate self-defense.” *Heller*, 554 U.S. at 635. This
21 right extends to those arms that are “in common use today.” *Bruen*, 597 U.S. at 47.

22 17. District of Columbia criminalizes possession of firearms not registered with
23 the MPD. D.C. *See* D.C. Code § 7-2502.01(a) (“No person or organization in the District
24 shall possess or control any firearm, unless the person or organization holds a valid
25 registration certificate for the firearm.”); D.C. Code § 2507.06.

26 18. Certain categories of firearms may never be registered in D.C., which means
27 they may never be legally possessed inside the home by law-abiding citizens for
28

1 self-defense, public defense, target shooting, or other lawful purposes. *See* D.C. Code §
2 7-2502.02(a).

3 19. The registration prohibition extends to an array of weapons currently in
4 common use in America, including semi-automatic rifles like the AR-15 and numerous
5 other pistols and shotguns. *See* D.C. Code § 7-2501.01(3A)(A)¹.

6 20. Other semi-automatic weapons defined as a prohibited “assault weapon”
7 include, for example: a) “semiautomatic pistol[s] that ha[ve] the capacity to accept a
8 detachable magazine and . . . a threaded barrel”; and b) “[a] semiautomatic shotgun that
9 has . . . a pistol grip that protrudes conspicuously beneath the action of the weapon.” *Id.*
10 The term “pistol grip” is not defined. *Id.*

11 21. If a law-abiding citizen possesses a Second Amendment-protected firearm
12 that is not registerable in D.C. in the home for the lawful purpose of self-defense, that
13 individual faces anything from an administrative fine to a criminal misdemeanor
14 conviction punishable by up to one year in jail and a \$2,500 fine. *See* D.C. Code §§
15 7-2507.06(a), (b)(1) (allowing for an administrative disposition of certain offenses at the
16 prosecution’s discretion); 22-3571.01(b)(5).

17 22. Chief Smith and MPD routinely arrest law-abiding citizens for possessing
18 firearms that are protected under the Second Amendment but not registerable in D.C. *See*
19 D.C. Code § 23-581. Upon information and belief, DC Defendants will continue to
20 execute their duties as prescribed by law.

21
22
23
24 ¹ The United States Court of Appeals for the District of Columbia in *Heller v.*
25 *D.C.*, 670 F.3d 1244 (D.C. Cir. 2011), upheld the registration prohibitions at issue in the
26 present litigation, but that court utilized “intermediate scrutiny.” Subsequently, the U.S.
27 Supreme Court in *New York State Rifle & Pistol Ass’n, Inc. v. Bruen*, 597 U.S. 1, (2022),
28 expressly repudiated application of intermediate scrutiny to its current two-prong test
requiring plaintiffs to show the conduct is protected by the Second Amendment, then
shifting the burden to the defendants to show the regulation or enforcement action is
within the Nation’s historical tradition. Accordingly, the Circuit court’s assessment does
not bar the current claim and is not binding precedent. Moreover, then-Judge Kavanaugh
reached the opposite conclusion employing the text, history, and tradition test ultimately
adopted by *Bruen*.

23. The Attorney General for the District of Columbia and the Office of Attorney General for the District of Columbia have the authority to prosecute all misdemeanor firearm offenses and seek enforcement of related fines. *See* D.C. Code § 23-101(a).

24. As a result of conduct by all DC Defendants, which District of Columbia's law mandates, law-abiding citizens who own firearms protected under the Second Amendment are prevented from registering and, therefore, legally possessing within the meaning of local ordinance such firearms within our Nation's capital. *See* Def. Mot. Dismiss, *Yzaguirre v. District of Columbia*, No. 1:24-cv-01828 (D.D.C. Jan. 15, 2025), Dkt. No. 26.

25. As a result of conduct by all DC Defendants, which District of Columbia's law mandates, law-abiding citizens possessing firearms protected under the Second Amendment face arrest, fines, prosecution, and forfeiture of their property.

26. Unless and until this Court enjoins DC Defendants and enters the declaratory relief that the United States is seeking, DC Defendants will continue enforcing the unconstitutional provisions of D.C. law.

COUNT I

(Violation of 34 U.S.C. § 12601 – Unconstitutional Pattern or Practice of Preventing Possession of Firearms Protected under the Second Amendment by Law-Abiding Citizens for Lawful Purposes)

27. The United States re-alleges and incorporates by reference the allegations set forth in paragraphs 1-[[##]] above.

28. The United States is authorized under 34 U.S.C. § 12601(b) to seek declaratory and equitable relief to eliminate a pattern or practice of law enforcement officer conduct that deprives persons of rights, privileges, or immunities secured or protected by the Constitution or laws of the United States.

29. The Second Amendment of the United States Constitution generally protects the right of law-abiding individuals to keep and bear arms in common use for lawful purposes such as self-defense while in the home. *See generally Heller*, 554 U.S. 570.

1 30. D.C. Code currently prohibits the registration of the AR-15 and other
2 semi-automatic rifles, which makes it illegal for law-abiding citizens to possess these
3 firearms in the home for lawful purposes. D.C. Code § 7-2501.01(3A)(A)(i)(I)(ee).

4 31. The AR-15 is a firearm in common use for lawful purposes.² Other
5 semi-automatic rifles that D.C. code bans are also in common use by law-abiding citizens
6 for lawful purposes.

7 32. Handguns “are the most popular weapon chosen by Americans for
8 self-defense in the home . . .” *Heller*, 554 U.S. at 629.

9 33. Shotguns not otherwise barred by Federal law and protected under the Second
10 Amendment are not only commonly used for lawful purposes, but they also provide an
11 important means of self-defense. *See McDonald v. City of Chicago, Ill.*, 561 U.S. 742,
12 857-8 (2010) (Thomas, J., concurring).

13 34. There is no exception in the D.C. Code to the registration prohibition of
14 firearms currently banned under the D.C. Code yet otherwise protected under the Second
15 Amendment for law-abiding citizens seeking to possess them for lawful purposes.

16 35. There is no historically analogous prohibition of the broad ban of firearms
17 that are in common use by law-abiding citizens for lawful purposes, such as self-defense
18 inside the home.

19 36. There is no historically analogous justification for the prohibition of the broad
20 ban of commonly used firearms by law-abiding citizens for lawful purposes, such as
21 self-defense inside the home.

22 37. Chief Smith and the MPD are law enforcement authorities subject to the
23 prohibition in 34 U.S.C. § 12601(a), and the officers in their employ are law enforcement
24 officers who act on DC Defendants’ behalf in the discharge of their duties, including the
25 duty to process and approve applications for firearm registration within D.C.

26
27
28 ² *Smith & Wesson Brands, Inc. v. Estados Unidos Mexicanos*, 605 U.S. 280, 297
(2025) (unanimous opinion) (noting that “[t]he AR-15 is the most popular rifle in the
country”).

38. The District of Columbia is a governmental entity within the meaning of 34 U.S.C. § 12601(a) and funds Defendants Chief Smith and the MPD to carry out its duties as required by the D.C. Code.

39. The denial and prohibition of registrations as alleged in *Yzaguirre, et al. v. D.C., et al.*, 1:24-cv-1828 (D. D.C.) are not isolated, peculiar, or accidental incidents.

40. Indeed, unconstitutional law and official policy obligates all DC Defendants to deny registration of Second Amendment-protected firearms that law-abiding citizens possess for lawful use within D.C. and to arrest such individuals for conduct the Second Amendment protects.

41. Accordingly, DC Defendants have engaged, and continue to engage, in a pattern or practice of conduct by law enforcement officers that deprives people of rights secured and protected by the Constitution, in violation of 34 U.S.C. § 12601(a).

42. Unless this Court enjoins DC Defendants and grants the declaratory relief the United States is seeking, all DC Defendants will continue to engage in the pattern or practice of the conduct described above, which deprives law-abiding individuals of their Second Amendment rights to possess firearms protected under the Second Amendment for lawful purposes, such as self-defense in the home.

PRAYER FOR RELIEF

43. WHEREFORE, the United States hereby prays that the Court grant the following relief:

a. A declaration that DC Defendants are engaged in a pattern or practice of conduct by law enforcement officers that deprives persons of rights, privileges, or immunities secured or protected by the Constitution or laws of the United States in violation of the Violent Crime Control and Law Enforcement Act of 1994, 34 U.S.C. § 12601(b), including, but not limited to:

i. A declaration that the pattern and practice by DC Defendants of prohibiting registration of the AR-15 by law-abiding citizens violates the Second Amendment; and

1 ii. A declaration that the pattern and practice by DC Defendants of
2 prohibiting registration of all other firearms without an automatic firing mechanism and
3 otherwise protected under the Second Amendment that law-abiding citizens possess
4 violates the Second Amendment;

5 b. A permanent injunction prohibiting all DC Defendants from arresting and
6 levying fines against otherwise law-abiding citizens for possessing the AR-15 and all other
7 firearms protected by the Second Amendment and being possessed or used for lawful
8 purposes;

9 c. A permanent injunction requiring all DC Defendants within a reasonable
10 period of time to enable and allow the registration of firearms protected under the Second
11 Amendment by law-abiding citizens; and

12 d. An award of all such additional relief as the interests of justice may require.
13

14 DATED: December 22, 2025.

Respectfully submitted:

15 HARMEET K. DHILLON
16 Assistant Attorney General
Civil Rights Division

17 JESUS A. OSETE
18 Principal Deputy Assistant Attorney General

19 R. JONAS GEISSLER
Deputy Assistant Attorney General

20 */s/ Andrew M. Darlington*

21

ANDREW M. DARLINGTON
22 Senior Counsel

23 GREGORY DOLIN
Senior Counsel

24 WILLIAM J. HANRAHAN
25 AUSTIN FULK
Trial Attorneys, Second Amendment Section

26 Attorneys for Plaintiff
27 UNITED STATES OF AMERICA
28

CIVIL COVER SHEET

JS-44 (Rev. 10/2020 DC)

I. (a) PLAINTIFFS United States of America (b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF _____ (EXCEPT IN U.S. PLAINTIFF CASES)	DEFENDANTS THE DISTRICT OF COLUMBIA, CHIEF OF POLICE PAMELA SMITH, in her official capacity as Chief of the Metropolitan Police Department of the District of Columbia, the METROPOLITAN POLICE DEPARTMENT OF THE DISTRICT OF COLUMBIA. COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____ (IN U.S. PLAINTIFF CASES ONLY) <small>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</small>
(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER) Andrew M. Darlington; Civil Rights Division U.S. Department of Justice; 950 Pennsylvania Ave., NW, Washington, D.C. 20530; Tel.: (202) 550-5305; Andrew.Darlington@usdoj.gov	ATTORNEYS (IF KNOWN) Attorney General Brian Schwalb

II. BASIS OF JURISDICTION (PLACE AN x IN ONE BOX ONLY) <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input checked="" type="radio"/> 1 U.S. Government Plaintiff </div> <div style="width: 48%;"> <input type="radio"/> 3 Federal Question (U.S. Government Not a Party) </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 48%;"> <input type="radio"/> 2 U.S. Government Defendant </div> <div style="width: 48%;"> <input type="radio"/> 4 Diversity (Indicate Citizenship of Parties in item III) </div> </div>	III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN x IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) FOR DIVERSITY CASES ONLY! <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> </tr> </thead> <tbody> <tr> <td>Citizen of this State</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td>Incorporated or Principal Place of Business in This State</td> <td style="text-align: center;"><input checked="" type="radio"/> 4</td> <td style="text-align: center;"><input type="radio"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="radio"/> 5</td> <td style="text-align: center;"><input type="radio"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="radio"/> 6</td> <td style="text-align: center;"><input type="radio"/> 6</td> </tr> </tbody> </table>		PTF	DFT		PTF	DFT	Citizen of this State	<input type="radio"/> 1	<input type="radio"/> 1	Incorporated or Principal Place of Business in This State	<input checked="" type="radio"/> 4	<input type="radio"/> 4	Citizen of Another State	<input type="radio"/> 2	<input type="radio"/> 2	Incorporated and Principal Place of Business in Another State	<input type="radio"/> 5	<input type="radio"/> 5	Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6
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Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6																				

IV. CASE ASSIGNMENT AND NATURE OF SUIT

(Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)

<input type="radio"/> A. Antitrust 410 Antitrust	<input checked="" type="radio"/> B. Personal Injury/Malpractice 310 Airplane 315 Airplane Product Liability 320 Assault, Libel & Slander 330 Federal Employers Liability 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Medical Malpractice <input type="checkbox"/> 365 Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Product Liability	<input type="radio"/> C. Administrative Agency Review 151 Medicare Act <u>Social Security</u> 861 HIA (1395ff) 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <u>Other Statutes</u> <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)	<input type="radio"/> D. Temporary Restraining Order/Preliminary Injunction Any nature of suit from any category may be selected for this category of case assignment. *(If Antitrust, then A governs)*
<input checked="" type="radio"/> E. General Civil (Other) OR <input type="radio"/> F. Pro Se General Civil			
<u>Real Property</u> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent, Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property <u>Personal Property</u> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<u>Bankruptcy</u> <input type="checkbox"/> 422 Appeal 27 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <u>Prisoner Petitions</u> <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Conditions <input type="checkbox"/> 560 Civil Detainee – Conditions of Confinement <u>Property Rights</u> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent – Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 (DTSA)	<u>Federal Tax Suits</u> <input type="checkbox"/> 870 Taxes (US plaintiff or defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609 <u>Forfeiture/Penalty</u> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <u>Other Statutes</u> <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 430 Banks & Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organization <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Satellite TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions (if not administrative agency review or Privacy Act)

<input type="radio"/> G. Habeas Corpus/ 2255 <input type="checkbox"/> 530 Habeas Corpus – General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus – Alien Detainee	<input type="radio"/> H. Employment Discrimination <input type="checkbox"/> 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) *(If pro se, select this deck)*	<input type="radio"/> I. FOIA/Privacy Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	<input type="radio"/> J. Student Loan <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (excluding veterans)
<input type="radio"/> K. Labor/ERISA (non-employment) <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="radio"/> L. Other Civil Rights (non-employment) <input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 Americans w/Disabilities – Employment <input type="checkbox"/> 446 Americans w/Disabilities – Other <input type="checkbox"/> 448 Education	<input type="radio"/> M. Contract <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholder's Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="radio"/> N. Three-Judge Court <input type="checkbox"/> 441 Civil Rights – Voting (if Voting Rights Act)

V. ORIGIN
☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify)
 ☐ 6 Multi-district Litigation
 ☐ 7 Appeal to District Judge from Mag. Judge
 ☐ 8 Multi-district Litigation – Direct File

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)
 34 USC 12601; Defendants conduct a pattern or practice of infringing against Second Amendment rights.

VII. REQUESTED IN COMPLAINT

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

JURY DEMAND: YES ☐ NO ☒

Check YES only if demanded in complaint

VIII. RELATED CASE(S) IF ANY

(See instruction)

YES ☒ NO ☐

If yes, please complete related case form

DATE: 12/22/2025

SIGNATURE OF ATTORNEY OF RECORD Andrew M. Darlington

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil coversheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil cover sheet. These tips coincide with the Roman Numerals on the cover sheet.

- I.** COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III.** CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV.** CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI.** CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII.** RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.