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10 Attorneys for Defendant  
11 JUGGERNAUT TACTICAL INC.

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 IN AND FOR THE COUNTY OF ORANGE - CIVIL COMPLEX CENTER

14 Hon. William D. Claster, Coordination Trial Judge

15 Coordination Proceeding Special  
16 Title (Rule 3.550)

) Case No. JCCP 5167

17 GHOST GUNNER FIREARMS CASES

) SUPERIOR COURT OF CALIFORNIA  
) COUNTY OF ORANGE  
) CASE NO. 30-2019-01111797

18 Included actions:

19 Cardenas v. Ghost Gunner, Inc. dba  
20 GhoseGunner.net, et al.

) SUPERIOR COURT OF CALIFORNIA  
) COUNTY OF SAN BERNARDINO  
) CASE NO. CIVDS193452

21 McFadyen, et al. v. Ghost Gunner, Inc. dba  
22 GhostGunner.net, et al.

) **DECLARATION OF HOWARD B.  
) SCHILSKY IN SUPPORT OF  
) DEFENDANT JUGGERNAUT  
) TACTICAL, INC.'S NOTICE OF  
) MOTION AND MOTION FOR  
) SANCTIONS PURSUANT TO  
) CALIFORNIA CODE OF CIVIL  
) PROCEDURE SECTION 128.7**

) **Res ID: 73828153**

) **Date: September 16, 2022**

) **Time: 9:00 a.m.**

) **Dept.: CX104**

28 5351110

1 **DECLARATION OF HOWARD SCHILSKY**

2 I, Howard Schilsky, declare and affirm:

3 1. I am an attorney duly licensed to practice law before all courts of the State of New  
4 York and the United States District Court for the Southern District of New York. I am admitted  
5 *pro hac vice* with respect to the defense of Defendant Juggernaut Tactical, Inc. (“Juggernaut  
6 Tactical”) in this case. I am a member in good standing with the State Bar of New York. I have  
7 personal knowledge of the following facts, except for those based on information and belief,  
8 which I believe to be true, and if called upon to testify, I could and would competently testify to  
9 their truth and accuracy.

10 2. This declaration is submitted in support of Juggernaut Tactical’s Motion for  
11 Sanctions Pursuant to California Code of Civil Procedure Section 128.7.

12 3. In executing this Declaration, I do not intend, and Juggernaut Tactical has not  
13 authorized me, to waive any protections or privileges that Juggernaut Tactical may have as to  
14 proprietary, trade secret, and/or confidential information, or as to attorney-client communications  
15 or information developed in anticipation of or in pending litigation.

16 4. Attached hereto as Exhibit “A” is a true and correct copy of the correspondence  
17 dated June 20, 2022, from the undersigned to counsel for Plaintiffs, which also includes as  
18 attachments the Report and CV of Michael Shain, and the Declaration of Zackary King.

19 5. Attached hereto as Exhibit “B” is a true and correct copy of the correspondence  
20 dated July 18, 2022, from the undersigned to counsel for Plaintiffs.

21 I declare under penalty of perjury under the laws of the State of California that the  
22 foregoing is true and correct, and that this declaration was executed this 16th day of August  
23 2022 at White Plains, NY.

24  
25   
26 \_\_\_\_\_  
Howard Schilsky, Declarant

# **Exhibit A**



**RENZULLI**  
LAW FIRM LLP

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WHITE PLAINS, NY 10601  
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June 20, 2022

**VIA E-MAIL**

Amy K. Van Zant  
Orrick, Herrington & Sutcliff, LLP  
1000 Marsh road  
Menlo Park, CA 94025  
[avanzant@orrick.com](mailto:avanzant@orrick.com)

**Re: *Ghost Gunner Firearms Cases*  
Judicial Council Coordination Proceeding No. 5167**

Dear Amy:

As you know, we represent Juggernaut Tactical, Inc. (“Juggernaut Tactical”) in connection with the above-referenced coordinated proceeding. We are writing to again inform you that none of the firearms or firearm parts misused by Kevin Neal in the November 2017 shooting incident were manufactured by Juggernaut Tactical. Based on the recent evidence inspection on May 24, 2022, this is indisputable. Accordingly, we write as a courtesy to respectfully demand that Juggernaut Tactical not be named as a defendant in Plaintiffs’ amended complaint. Should Juggernaut Tactical be named as a defendant in the amended complaint, we will promptly serve notice under California Code of Civil Procedure § 128.7, which will be followed by filing a motion for sanctions upon the lapse of the statutory safe harbor period.

In support of Juggernaut Tactical’s position that it is not a proper party to this action, attached is (1) a declaration from Zackary Kasanjian-King, President and owner of Juggernaut Tactical; and (2) the expert report of Michael Shain and his CV. These attachments set forth the incontrovertible reasons for which the evidence firearms and firearm parts unequivocally were not – and could not have been – manufactured by Juggernaut Tactical.

We are confident that Plaintiffs will appreciate these undeniable facts, and will forego naming Juggernaut Tactical as a defendant to the amended complaint. It is our intention by this courtesy letter (and the accompanying documents) to avoid the necessity of seeking sanctions

***Ghost Gunner Firearms Cases***

against Plaintiffs and their counsel for knowingly filing frivolous claims against Juggernaut Tactical.

We look forward to your anticipated cooperation. Should you have any questions or if you would like to discuss further, please call.

Very truly yours,

**RENZULLI LAW FIRM, LLP**

A handwritten signature in black ink, appearing to read "Howard Schilsky", is written over a faint, light-colored rectangular background.

Howard Schilsky

cc: Shayan Said ([ssaid@orrick.com](mailto:ssaid@orrick.com))  
Estee Lewis ([estee@ca-lawyer.com](mailto:estee@ca-lawyer.com))  
Catie Barr ([catie@ca-lawyer.com](mailto:catie@ca-lawyer.com))  
Ben Rosenfeld ([ben.rosenfeld@comcast.net](mailto:ben.rosenfeld@comcast.net))  
Gerald Singleton ([gsingleton@singletonschreiber.com](mailto:gsingleton@singletonschreiber.com))  
Christopher Renzulli ([crenzulli@renzullilawfirm.com](mailto:crenzulli@renzullilawfirm.com))  
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9 Attorneys for Defendant  
 10 JUGGERNAUT TACTICAL INC.

11 SUPERIOR COURT OF CALIFORNIA  
 12 COUNTY OF ORANGE, CIVIL COMPLEX CENTER  
 13 Hon. William D. Claster, Coordination Trial Judge

14	Coordination Proceeding Special	)	JUDICIAL COUNCIL COORDINATION
15	Title (Rule 3.550)	)	PROCEEDING NO. 5167
16	GHOST GUNNER FIREARMS CASES	)	
17	Included actions:	)	<b>DECLARATION OF ZACKARY</b>
18	Cardenas v. Ghost Gunner, Inc. dba	)	<b>KASANJIAN-KING</b>
19	GhoseGunner.net, et al.	)	
20		)	
21	McFadyen, et al. v. Ghost Gunner, Inc. dba	)	
22	GhostGunner.net, et al.	)	
23		)	

24 \_\_\_\_\_  
 25 **DECLARATION OF ZACKERY KING**

26 I, Zackary Kasanjian-King, declare and affirm:

27 1. I am President and an owner of Juggernaut Tactical, Inc. ("Juggernaut Tactical"),  
 28 positions I have held since its founding in 2011. In the course and scope of my duties, I personally

1 oversee the design and manufacture of all Juggernaut Tactical products. I designed all 80% lower  
2 receivers, as well as all upper receivers, that have been manufactured by Juggernaut Tactical since  
3 its founding, and personally built prototypes for each. No product design of Juggernaut Tactical is  
4 produced without my oversight and approval. As such, I have personal knowledge of the following  
5 facts and, if called upon to testify, I could and would competently testify to their truth and accuracy.

6       2. All 80% lower receivers and upper receivers manufactured by Juggernaut Tactical  
7 are CNC machined using billet blanks. Juggernaut Tactical has never produced an 80% lower  
8 receiver or upper receiver using a forging manufacturing method.

9       3. The 80% lower receivers and upper receivers manufactured by Juggernaut Tactical  
10 have a unique design developed by me, and can only be made through CNC machining, starting  
11 with raw billet blanks.

12       4. On May 24, 2022, I attended the inspection of the evidence firearms and firearm  
13 parts at issue in this case, which were made available at the Red Bluff Sheriff's Office in Red  
14 Bluff, California. Accordingly, I personally observed each of the firearms and firearm parts made  
15 available for inspection that day.

16       5. It was plainly obvious from visual inspection alone that none of the evidence  
17 firearms or firearm parts, including the lower and upper receivers, were manufactured by  
18 Juggernaut Tactical. The evidence parts lacked any of the distinct features of a Juggernaut Tactical  
19 lower/upper receiver, including but not limited to (1) an oversized, solid trigger guard with  
20 machined contours, (2) a magazine well with changed angle, and (3) combined forward assist and  
21 shell deflector.

22       6. Moreover, it was visually apparent that the evidence 80% lower receivers and upper  
23 receivers made available for inspection were manufactured using a forging method. I recognize  
24 this from my extensive experience designing and manufacturing firearms and firearm parts at  
25 Juggernaut Tactical.

26       7. It is certain and unequivocal that none of the 80% lower receivers or upper receivers  
27 produced as evidence on May 24, 2022, were manufactured by Juggernaut Tactical.  
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8. I, on behalf of Juggernaut Tactical, provided Michael Shain with two exemplar 80% lower receivers, an upper receiver, and handguard. These exemplars are true and accurate samples of the only design for these products ever to be produced and sold by Juggernaut Tactical.

9. I have reviewed the report prepared by Michael Shain, and agree with all of his findings, conclusions, and opinions.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed this 16 day of June, 2022 at Redondo Beach, California.

  
\_\_\_\_\_  
Zackary Kasanjian-King, Declarant



June 16, 2022

Howard Schilsky, Esq.  
Renzulli Law Firm, LLP  
One North Broadway, Suite 1005  
White Plains, NY 10601

Re: Ghost Gunner Firearms Cases

Dear Mr. Schilsky,

Pursuant to your direction, I am submitting the following report based on the inspection of evidence presented in this matter by the Tehama County Sheriff's Office.

### **Inspection**

On 5/24/2022 I participated in a joint inspection of the firearms evidence related to this matter. The evidence is currently in possession of the Tehama County Sheriff's Office, located at 22840 Antelope Blvd., Red Bluff, CA.

The firearms evidence included two handguns, two shotguns, Three assembled AR15 style rifles, one incomplete AR15 style rifle and one additional AR15 style lower receiver.

This report will focus solely on the AR15 style rifles and components.

The inspection protocol administered by Tehama County allowed only for basic inspection techniques; photography, digital microscopy and measurements of features using calipers. Field stripping of the rifles was allowed, but no detail stripping. Disassembly beyond field stripping or further inspection was unnecessary to establish the manufacturing origin of the evidence.

### **Assignment**

My assignment in this matter was to inspect the firearm evidence and document data points that would confirm or disprove that any of the AR15 style evidence presented was manufactured by Juggernaut Tactical.

### **Summary of Findings**

The following documentation establishes that none of the evidence AR15 uppers or lower receivers were produced using the billet machining process. The Juggernaut Tactical product line is billet machined and incorporates distinctive and unique design characteristics. The examination of the evidence revealed that all of the evidence AR15 uppers and lowers were manufactured using the forging method.

My understanding, based on the Declaration of Zackary King, (the President of Juggernaut Tactical), is that Juggernaut Tactical has never produced an 80% forged AR15 upper or lower

Ghost Gunner Firearms Cases

and has only manufactured billet machined AR15 uppers and lowers that have unique design characteristics that were developed in-house by Mr. King.

Because Juggernaut Tactical has never produced a forged upper or lower AR15 receiver, it is impossible for any of the evidence AR15 uppers or lowers to have originated from Juggernaut Tactical.

## **Reference Materials**

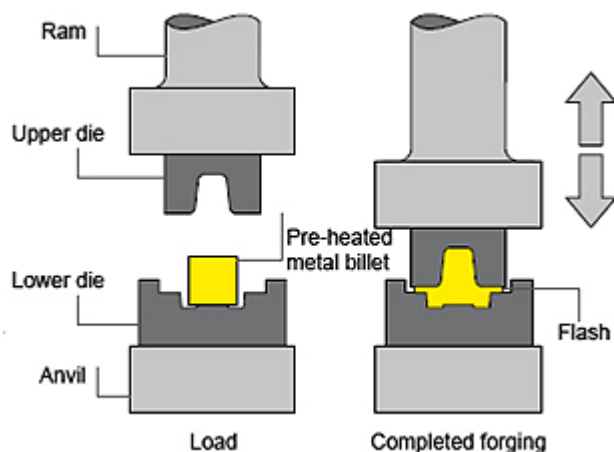
Exemplar receivers, (two models), an upper receiver and handguard were provided by Juggernaut Tactical for examination and comparison.

Declaration of Zackary King.

## **Background**

- Forging

AR lower receivers and upper receivers are typically manufactured using two distinctly different techniques. One is a forging process. This involves placing a hot ingot of aluminum in a closed die and using enormous force to press the die closed or by dropping an enormous amount of weight on the die to force it closed. The ingot takes the shape of the die and in the case of an AR15 upper or lower receiver, an unfinished solid product that requires secondary machining operations to complete.



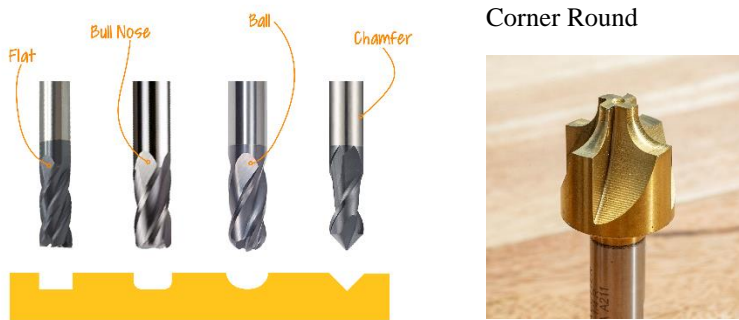
One noteworthy feature of a forged receiver is the radiused corners and edges. The radii allow the forging to more easily release from the die. See pages 9, 10 and 21 for examples of obvious forged radiused features.

Ghost Gunner Firearms Cases

- Machining

The other manufacturing technique utilized to create a lower receiver is machining. This process begins with a billet, (solid block), of aluminum and employs a machine tool to cut away the aluminum until the desired features are achieved. The milling machine uses cutters known as end mills that spin at high speeds to remove material from the billet.

Typical end mills come in basic shapes, including; square, ball, bull nose, corner round, (concave), and chamfer.



Machining leaves recognizable features and surface finishes that are distinctly different from forgings.

## Evidence and Exemplar Comparisons

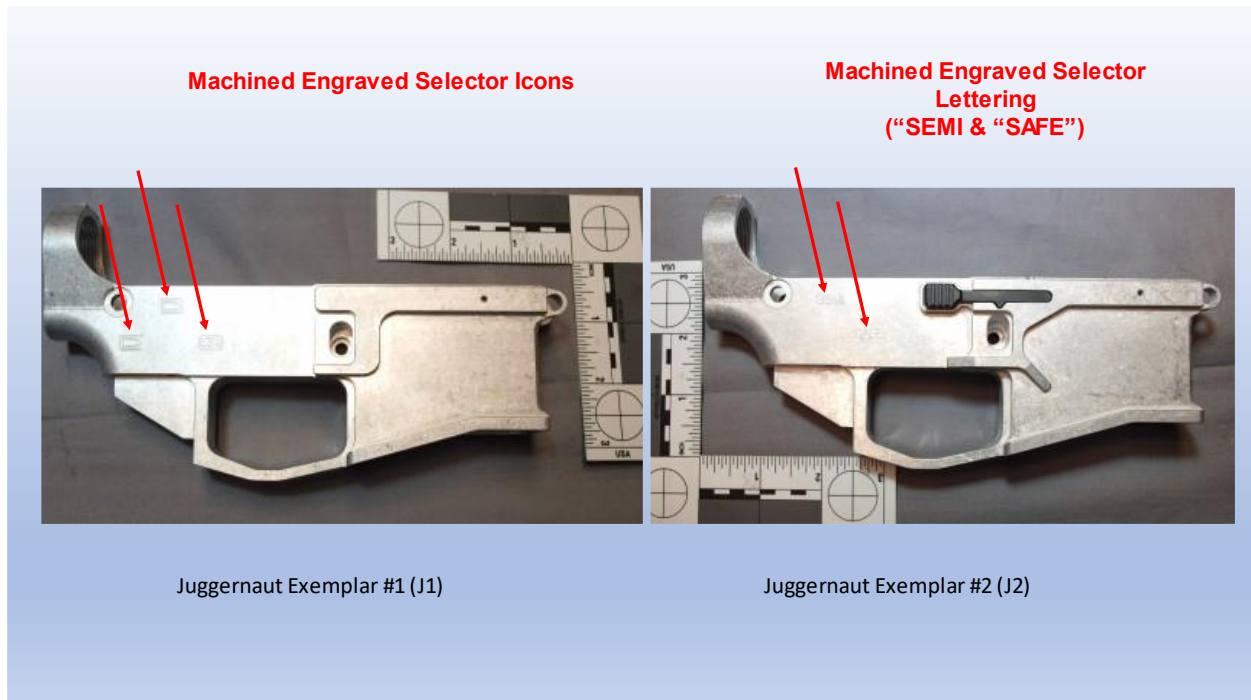
The machining signature is significant because all Juggernaut Tactical upper and lower receivers are machined. The following details some of those machined features that are unique.

The following depicts specific data points and features on the Evidence Upper and Lower Receivers and Handguards compared with the Juggernaut Tactical Exemplars.

1. Icons and Lettering

One of the most obvious differences between the Juggernaut Tactical Machined Lower Receivers and all five of the Forged Evidence Lower Receivers is in the Selector Icons and Lettering.

Ghost Gunner Firearms Cases



The two Exemplar Juggernaut Tactical Lower Receivers have mechanically engraved, (machined), icons or lettering. Four of the Five Evidence Lower Receivers have no icons or lettering and one Evidence Lower Receiver has stamped (forged) lettering that does not match either of the Juggernaut Tactical Lower Receivers in lettering, (SEMI vs. FIRE), or font.



Ghost Gunner Firearms Cases

**No Selector Icons or Lettering**



S1-36 Forged Lower-Evidence AR15 Rifle#1 (E2)

S1-49 Forged Lower-Evidence AR15 Rifle #2 (E3)

**No Selector Icons or Lettering**



DOJ-9 Forged Lower-Evidence AR15 Rifle #3 (E5)

379-2 Forged Lower- Incomplete Evidence AR15 Rifle (E4)

Ghost Gunner Firearms Cases

2. Trigger Guards

Forged AR15 Lower Receivers retain an original trigger guard style that incorporates a hinged floor plate that can be opened to allow for the use of gloves.

Machined (Billet) AR15 Lower Receivers typically are redesigned to utilize a fixed, oversized trigger guard that will allow the use of gloves but provides a stronger, uninterrupted surface without the need for pins or hinges.

The Juggernaut Tactical Machined Lower Receiver Exemplars have solid, fixed, oversized Trigger Guards, unlike all of the five Evidence Forged Lower Receivers that have standard, hinged floor plate style Trigger Guards.

**Machined Trigger Guard – Oversized, Solid & Continuous,  
Square Edged, Unique Shape, No Pins or Pivoting Floor Plate**



Juggernaut Exemplar #1 (J1)

Juggernaut Exemplar #2 (J2)

Ghost Gunner Firearms Cases

**Forged Trigger Guard-Not Solid or Continuous, Separate Hinged Movable Plate Held In Place With Pins, (Not Installed Below), Adjacent Forged Features Have Radiused Contours**



#379-14 Forged Lower Evidence Receiver #1 (E1)

**Forged Trigger Guard-Not Solid or Continuous, Separate Hinged Movable Plate Held In Place With Pins, Adjacent Forged Features Have Radiused Contours**



S1-36 Forged Lower-Evidence AR15 Rifle#1 (E2)



S1-49 Forged Lower-Evidence AR15 Rifle #2 (E3)

Ghost Gunner Firearms Cases

**Forged Trigger Guard-Not Solid or Continuous, Separate Hinged Movable Plate Held In Place With Pins, Adjacent Forged Features Have Radiused Contours**



DOJ-9 Forged Lower-Evidence AR15 Rifle #3 (E5)



379-2 Forged Lower- Incomplete Evidence AR15 Rifle (E4)

### 3. Raised Relief Feature

The Raised Relief Feature on the right side of the AR15 Lower Receiver has two main purposes: to house the spring and detent for the front pivot pin and to create a nest to protect the magazine release button.

All five of the Forged Evidence Lower Receivers exhibit the typical radiused raised relief features that blend into the flat surface of the receiver body. This type of blending cannot be machined and is indicative of a forged part. This is a part made in a die.

The Juggernaut Machined Lower Receiver exhibits a flat, square edged feature that does not blend with the receiver body. This is a part made with a cutting tool.



Ghost Gunner Firearms Cases

**Flat Machined Features Have Continuous Elevation and 90 degree Square Transitions Along All Edges Including Inside and Outside Radii**



Juggernaut Exemplar #1 (J1)

Juggernaut Exemplar #2 (J2)

**Forged Features are Rounded and have Various Elevations with Inside and Outside Blending That Can Not Be Produced by Machining**



#379-14 Forged Lower Evidence Receiver #1 (E1)

Ghost Gunner Firearms Cases

**Forged Features are Rounded and have Various Elevations with Inside and Outside Blending That Can Not Be Produced by Machining**



S1-36 Forged Lower-Evidence AR15 Rifle#1 (E2)



S1-49 Forged Lower-Evidence AR15 Rifle #2 (E3)

**Forged Features are Rounded and have Various Elevations with Inside and Outside Blending That Can Not Be Produced by Machining**



DOJ-9 Forged Lower-Evidence AR15 Rifle #3 (E5)



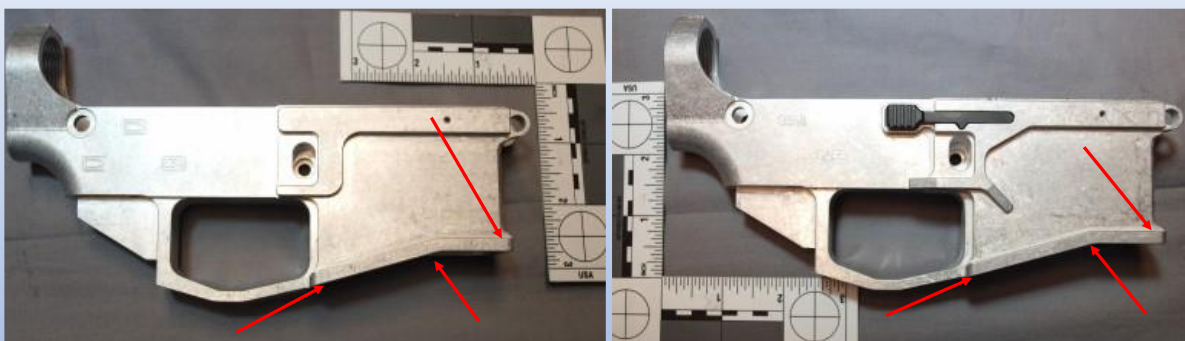
379-2 Forged Lower- Incomplete Evidence AR15 Rifle (E4)

#### 4. Magazine Well Profile

All five Forged Evidence Lower Receivers have a continuous straight line Magazine Well Profile. The lip of the Magazine Well is radiused, (like the other forged features).

Both of the Juggernaut Tactical Machined Lower Receivers have a unique Magazine Well Profile that has a distinctive change in angle and a square edged lip.

**Machined Profile of Magazine Well is Unique to the Juggernaut Tactical Design, the Well Changes Angle, Lip is Flat and 90 degrees Square**



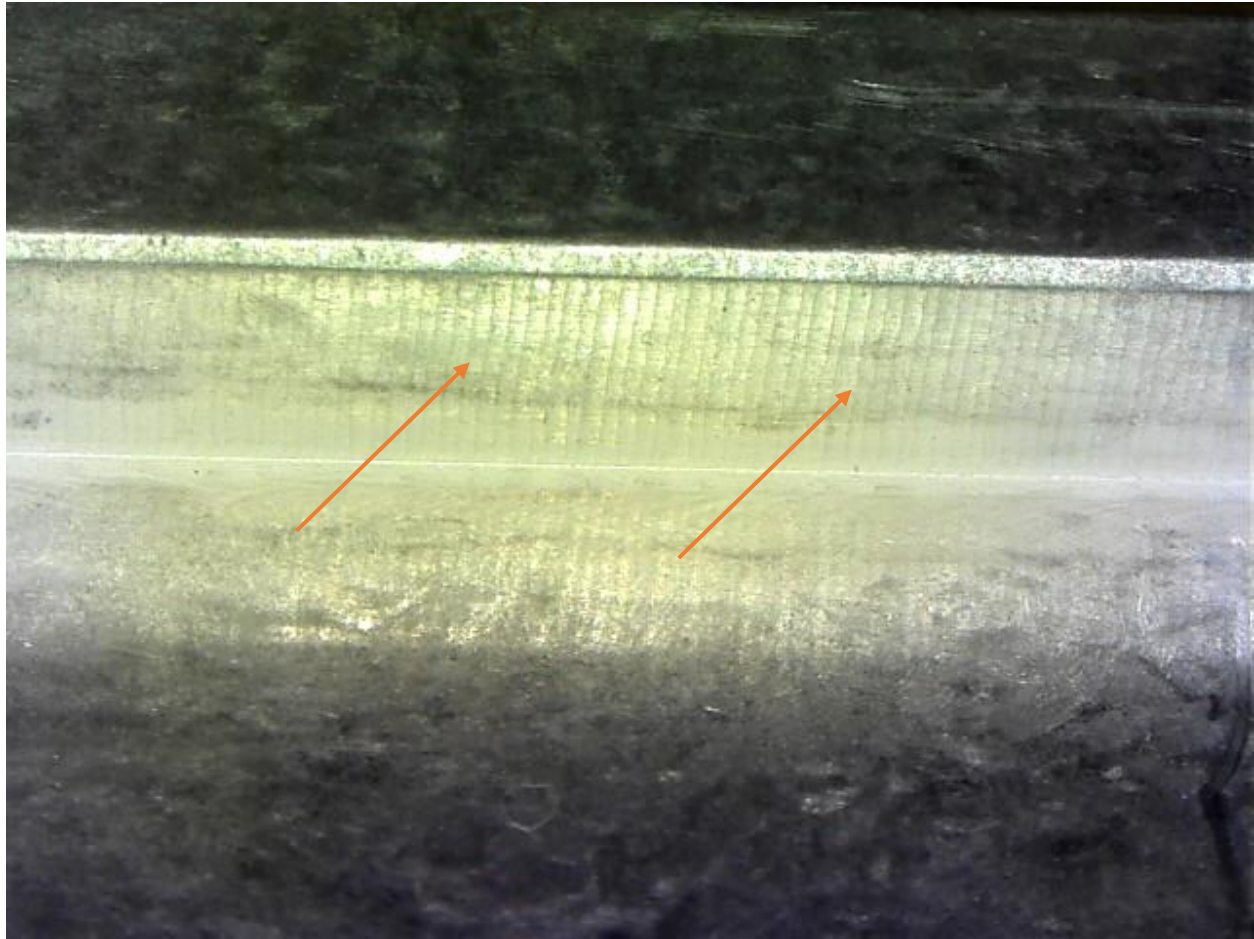
Juggernaut Exemplar #1 (J1)

Juggernaut Exemplar #2 (J2)

Using a digital microscope, the tool marks on the top edge of the Magazine Well lip of the Juggernaut Tactical lower receiver can be seen.

These are marks left by a cutting tool. These tool marks are not present on the lip of any of the five Forged Evidence Lower Receivers.

Ghost Gunner Firearms Cases



**Profile of Forged Magazine Well is Straight and Lip is Radiused. The Forged Profile is identical across all of the Evidence Lower Receivers**



#379-14 Forged Lower Evidence Receiver #1 (E1)

Ghost Gunner Firearms Cases

**Profile of Forged Magazine Well is Straight and Lip is Radiused. The Forged Profile is identical across all of the Evidence Lower Receivers**



S1-36 Forged Lower-Evidence AR15 Rifle#1 (E2)



S1-49 Forged Lower-Evidence AR15 Rifle #2 (E3)

**Profile of Forged Magazine Well is Straight and Lip is Radiused. The Forged Profile is identical across all of the Evidence Lower Receivers**



DOJ-9 Forged Lower-Evidence AR15 Rifle #3 (E5)



379-2 Forged Lower- Incomplete Evidence AR15 Rifle (E4)

5. Receiver Front Pivot Pin Profile

All five of the Forged Evidence Lower Receivers have a large radius at the front of the receiver under the front pivot pin.

Ghost Gunner Firearms Cases

Both of the Juggernaut Tactical Machined Lower Receivers have a consistent .250" radius under the front pivot pin hole.

**Radius Under Machined Lower Receiver Forward Pivot Pin is .250"**



Juggernaut Exemplar #1 (J1)



Juggernaut Exemplar #2 (J2)

**Radius Under Forged Lower Receiver Forward Pivot Pin is Much Larger than .250"**



#379-14 Forged Lower Evidence Receiver #1 (E1)

Ghost Gunner Firearms Cases

Radius Under Forged Lower Receiver Forward Pivot  
Pin is Much Larger than .250"



S1-36 Forged Lower-Evidence AR15 Rifle #1 (E2)



S1-49 Forged Lower-Evidence AR15 Rifle #2 (E3)

Radius Under Forged Lower Receiver Forward Pivot  
Pin is Much Larger than .250"



DOJ-9 Forged Lower-Evidence AR15 Rifle #3 (E5)



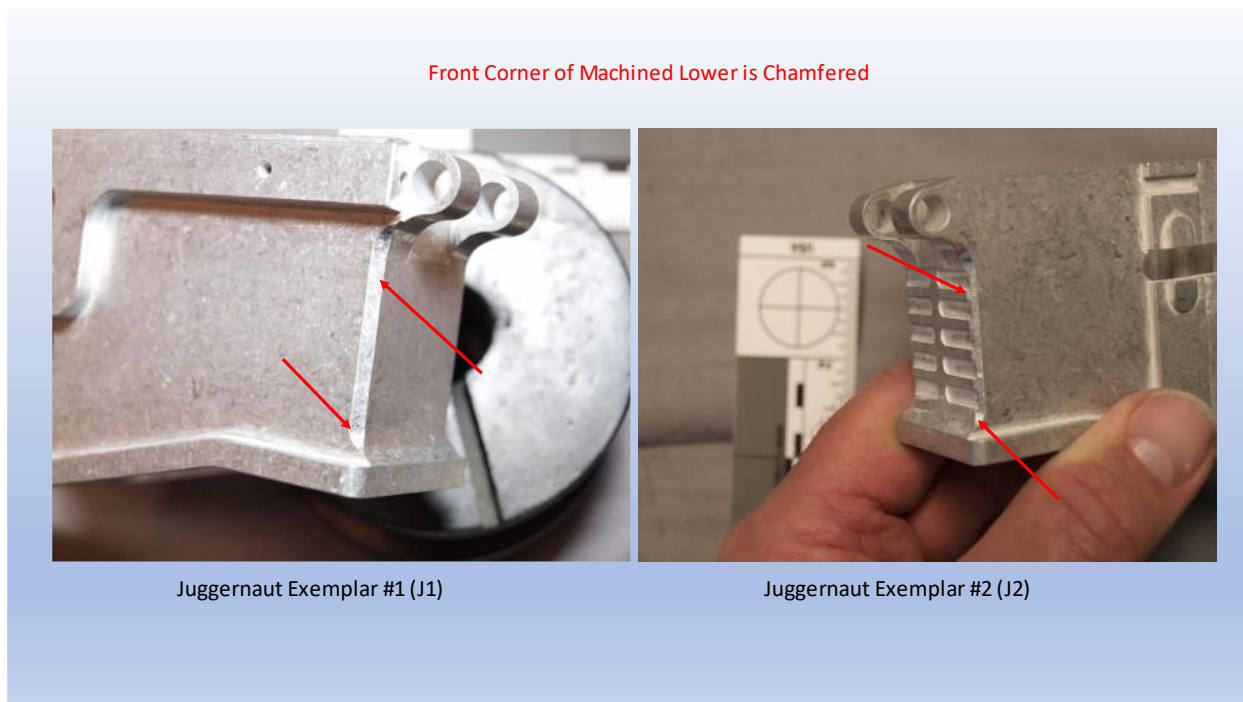
379-2 Forged Lower- Incomplete Evidence AR15 Rifle (E4)

Ghost Gunner Firearms Cases

6. Front Corner Profile

The Front Corner Profile of all five of the Forged Evidence Lower Receivers is radiused.

The Front Corner Profile of both Juggernaut Tactical Machined Lower Receivers is chamfered. The chamfered edge “blends” below the pivot pin and above the magazine well lip, because a cutting tool, (a chamfer mill), was used to make this profile.



Using a digital microscope, the sharp “blend” point of the chamfer on the Juggernaut Tactical Machined Lower Receiver can be seen, as well as the tool marks left by the cutting tool. This feature is unique to the Juggernaut Tactical machined lower receiver and is unlike any feature found on the five Forged Evidence Lower Receivers.



Ghost Gunner Firearms Cases



Front Corner of Forged Lower is Radiused



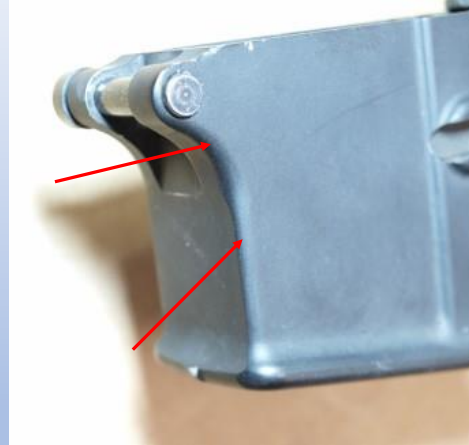
#379-14 Forged Lower Evidence Receiver #1 (E1)

Ghost Gunner Firearms Cases

Front Corner of Forged Lower is Radiused



S1-36 Forged Lower-Evidence AR15 Rifle#1 (E2)



S1-49 Forged Lower-Evidence AR15 Rifle #2 (E3)

Front Corner of Forged Lower is Radiused



DOJ-9 Forged Lower-Evidence AR15 Rifle #3 (E5)



379-2 Forged Lower- Incomplete Evidence AR15 Rifle (E4)

7. Trigger Guard Inside Corner Radius

All five of the Forged Evidence Lower Receivers have the same Trigger Guard Inside Radius Profile. It is far larger than .250" and is one continuous radius from the top of the Trigger Guard to the bottom. This is mirrored at both the front and rear of the Trigger Guard.

Ghost Gunner Firearms Cases

The Juggernaut Tactical Machined Lower Receivers have a Trigger Guard profile that is a .250" radius tangential to a flat vertical surface, repeating front and rear.

Machined Juggernaut Lower Receiver Trigger Guard Profile has .250" Radius Inside Corners with a Straight Vertical Rear Surface



Juggernaut Exemplar #1 (J1)



Juggernaut Exemplar #2 (J2)

Forged Evidence Lower Receivers Trigger Guard Profiles have Noticeably Larger Continuous Inside Corner Radius with No Flat Vertical Surface



#379-14 Forged Lower Evidence Receiver #1 (E1)

Ghost Gunner Firearms Cases

Forged Evidence Lower Receivers Trigger Guard Profiles have Noticeably Larger Continuous Inside Corner Radius with No Flat Vertical Surface



S1-36 Forged Lower-Evidence AR15 Rifle#1 (E2)



S1-49 Forged Lower-Evidence AR15 Rifle #2 (E3)

Forged Evidence Lower Receivers Trigger Guard Profiles have Noticeably Larger Continuous Inside Corner Radius with No Flat Vertical Surface



DOJ-9 Forged Lower-Evidence AR15 Rifle #3 (E5)



379- 2 Forged Lower- Incomplete Evidence AR15 Rifle (E4)

Ghost Gunner Firearms Cases

8. Forward Assist and Shell Deflector

The Forged Evidence Lower Receivers all have traditional separate Forward Assist and Shell Deflectors that blend into the body of the Lower Receiver. The location of the Forged Forward Assist places the assembled Forward Assist plunger overhanging the rear of the Lower Receiver. The Forged Shell Deflector is a relatively symmetrical triangle shape. These are features that were made by a die.

The Machined Juggernaut Tactical Lower Receiver has an oversized Forward Assist profile that places the assembled plunger forward of the rear of the Lower Receiver and there is a machined relief undercut to allow clearance for the plunger. The Shell Deflector has an asymmetrical shape and is machined as part of the oversized Forward Assist feature. These are machined features.

Machined Forward Assist and Shell Deflector Combined, Shaped and Placed Differently, Relief Undercut Feature, Flat machined Surfaces with Sharp Corners



Juggernaut Exemplar #1 (J1)  
Machined Upper Receiver

Forged Forward Assist and Shell Deflector Separate, Radii Blend Into Receiver Body, No Undercut Feature, Assist Extends Beyond Rear of Receiver.



Evidence Rifle #1 TCSO# S1-36 ( E2)  
Forged Upper Receiver

Ghost Gunner Firearms Cases

9. Receiver Forge Markings

A definitive indication that the Evidence Lower Receivers and Upper Receivers are Forged and not Machined are the “Forge Markings” found on Evidence Rifle #1 and Incomplete Lower Receiver #2.

“Forge Markings” are unique marks placed in the die of the part to identify the origin of manufacture, (original Forging Manufacturer).

Evidence Rifle #1 Forged Lower has a Keyhole Forging Mark – This is a Cerro Fabricated Products, LLC Manufacturing Mark



Evidence Rifle #1 TCSO# S1-36 (E2)  
Forged Lower Receiver

Evidence Rifle #1 Forged Upper has a Square Forging Mark – This is a Brass Aluminum Forging Enterprises, LLC Manufacturing Mark



Evidence Rifle #1 TCSO# S1-36 (E2)  
Forged Upper Receiver

Ghost Gunner Firearms Cases

Evidence Upper #2 (Incomplete) Forged Upper has a Square Forging Mark – This is a Brass Aluminum Forging Enterprises, LLC Manufacturing Mark



Evidence Upper #2 TCSO# 379-2 (E4)  
Forged Upper Receiver – “Incomplete”

Evidence Rifle #3 Forged Upper has an “M” under a Diamond Forging Mark – This is a Mueller Industries manufacturing mark



Evidence Rifle DOJ-9 (E5) Forged Upper Receiver

Although several of the Evidence Uppers and Loweres apparently do not have “Forge Markings” it is obvious that all of the Evidence Upper and Lower Receivers are identical in how they were manufactured. The “Forge Markings” on the four examples shown above confirm that all of the Upper and Lower Receivers are all unequivocally manufactured using the Forging method.

Ghost Gunner Firearms Cases

## **Analysis and Summary**

The examination of the evidence AR15 upper and lower receivers revealed that all of them were manufactured using the technique known as forging.

The nine documented data points detailed above, any one of which would support the conclusion that the evidence AR15 uppers and lowers are forged, collectively represent overwhelming and unequivocal evidence that all of the evidence AR15 uppers and lowers were manufactured by forging.

The “Forge Markings” present on four of the evidence items is explicit and independent confirmation that they, and all of the other virtually identical evidence items presented for inspection, were manufactured by forging.

Forged upper and lower AR15 receivers are uniformly consistent in their design characteristics dating back to their original iterations as AR15 A1’s and A2’s and are the most commonly available.

“Billet” AR15 uppers and lowers occupy a niche market in the overall AR15 product category. Their unique characteristics are specific to the individual manufacturer.

The Juggernaut Tactical Machined uppers and lowers are instantly recognizable as “billet” machined products. They bear no resemblance in cosmetic appearance or in method of manufacturing to the forged evidence items.

## **Conclusion**

Based on the obvious, overwhelming and unambiguous physical evidence, it is my conclusion that the evidence AR15 rifles, incomplete AR15 rifle and AR15 lower receiver submitted for examination in this case have all been manufactured by forging.

None of the evidence rifles or incomplete upper and lower AR15 style receivers were produced by Juggernaut Tactical.

The facts and opinions expressed above are accurate to a reasonable degree of professional certainty. I reserve the right to supplement or modify this report in the event that pertinent additional information or evidence comes to my attention.



Michael Shain

GhostGunnerRPT



# *Michael Shain*

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## Curriculum Vitae

### Experience

#### *July 1994: President & General Manager, AIMPRO Tactical, LLC*

Operate firearms manufacturing, custom gunsmith services, training and consulting firm. Design and manufacture firearms accessories, provide custom and performance shop work for individual firearm clients, customize firearms for dealer direct wholesale orders and develop custom product design concepts for manufacturers. Provide training, testing, comprehensive assessments and evaluations, consultations and expert witness testimony for manufacturers, distributors and dealers. Conduct law enforcement and civilian firearms training, including basic and advanced firearms handling techniques and tactics and concealed carry courses. Provide technical advice and hands on training for firearms industry and non-firearms industry clients. Clients include UCLA Medical Center, Cedars Sinai Medical Center, Brinks International, Strum-Ruger, Beretta U.S.A., Heckler & Koch, Sig Arms, Smith & Wesson, Springfield Armory, Bersa, Weatherby, Touchstone Pictures, Icon Entertainment, and Warner Brothers. Clients include Military, Federal, State and local law enforcement personnel and civilian students.

#### *April 1994: Adjutant to the Acting Chief of Police*

Directed and managed all Internal Affairs investigations and coordinated Personnel matters with Human Resources. Developed training documentation, trouble shot and coordinated maintenance for department's computer aided dispatch and records management system. Developed and implemented new policies. Planned and directed special event field operations.

#### *December 1993: Commander Patrol Division*

##### *O.I.C. Internal Affairs Division*

Directed all uniformed services to a community of approximately 65,000. Supervised seven Patrol Sergeants/Watch Commanders and approximately 40 Police Officers. Managed Patrol Division resources, including vehicle fleet, emergency response equipment and computer support systems. Evaluated and approved training. Assigned, reviewed and conducted Internal Affairs investigations.

#### *March 1992: Lieutenant*

Promoted after placing third on a Statewide qualified candidate list. Commander of the Medical Center Division. Directed all Police, Security and Community Services to the largest medical complex in the Western United States. Administered a budget of approximately \$850,000 and a staff of eight sworn and twenty five civilian personnel, including mid-level managers and clerical staff. Supervised two full time investigators, all investigative follow-ups, crime prevention services and community service programs. Co-chaired departmental policy committee.

# *Michael Shain*

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## Curriculum Vitae

### *October 1990: Sergeant, Patrol Division*

Field Supervisor/Watch Commander. Conducted roll call and field training, deployed personnel and directed field operations. Special projects included Internal Affairs investigations, background investigations and extensive revision of the department's policy manual.

### *April 1988: Sergeant, Records and Communications Division*

Supervised 15 civilian personnel in addition to sworn staff. Supervised the selection, training and evaluation of staff. Coordinated the acquisition and directed the installation of a comprehensive records management system and computer aided dispatch system.

### *January 1985: Rangemaster/Principal Firearms Instructor*

(In addition to Detective duties) Developed and administered department weapons training program, including department transition to autoloaders. Managed quarterly firearms qualifications for seventy plus sworn personnel. Evaluated weapons and force related incidents and policies, recommended and provided remediation. Evaluated, tested and approved duty, off-duty and back-up firearms and ammunition.

### *April 1985: Detective*

Assigned to "Crimes Against Persons" desk. Conducted investigations, follow-ups and District/City Attorney criminal filings of all death investigations, robberies, sex crimes, assaults and weapon violations. Acted as Intelligence Liaison to outside agencies.

### *October 1983: Patrol Officer*

General Law Enforcement duties, including responding to calls for service, preliminary investigation of crimes, apprehension of suspects, protection of life and property. Deployed as part of L.A. Olympic Games multi-agency athlete protection detail.

### *July 1983 Police Officer – Trainee*

U.C.L.A. Police Department. Attended Orange County Peace Officers Academy.

# *Michael Shain*

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## Curriculum Vitae

### Qualifications

Possess *Basic, Intermediate, Advanced, Supervisory and Management* P.O.S.T Certificates

Completed P.O.S.T approved Supervisory School

Completed P.O.S.T Certificated Management School

Completed P.O.S.T Certificated Narcotics Investigation (*Course taught by DEA and LA County Sheriffs*) and Sexual Assault Investigation Schools (*taught by CA DOJ and San Jose PD*)

Completed L.A. County Sheriff's Department Homicide Investigator Training Program.

Completed L.A. County Sheriff's Department Automatic Weapons Training Program (*M-16, H&K MP5*)

Completed F.B.I. Certificated Firearms Instructor School

Completed L.A. County Sheriff's Department Autoloader Transition School

Completed Alameda County Advanced Officer's Tactics School

Completed L.A. County Sheriff's Laser Village I & II Schools

Completed P.O.S.T. approved Internal Affairs Investigator School

Completed C.S.T.I. Civil Emergency Management School (*San Louis Obispo*)

Completed D.O.J. Visual Investigative Analysis Training

Nominated for the F.B.I. National Academy Program

Former Member of the California Peace Officers' Association

Former Member of the California Sexual Assault Investigator Association

Former Member of the California Narcotics Officers Association

Member of the California Rangemasters Association

Member of the National Shooting Sports Foundation

Member of the National Association of Shooting Ranges

Member of the International Association of Law Enforcement Firearms Instructors

Member of the International Defensive Pistol Association

## Expert Witness Experience

(Deposition, Court Testimony or Federal Court Report)

Tosseth v. Beretta, United States District Court For The District Of North Dakota, 2019

Patterson v. Strang, Marshall County, IN Circuit Court, 2019

Granada Insurance v. Prestige Dance Studio, et.al., 11<sup>th</sup> Judicial Circuit Court, Miami-Dade, FL, 2018

Barthel v. Cobra, United States District Court, District of South Dakota, 2018

Rote v. Zel Custom Mfg, United States District Court, Southern District of Ohio, 2017

Watson v. Vista Outdoor, Inc., United States District Court, District of Colorado. 2017

Reynolds v. Doubletap Defense, United States District Court, District of Colorado, 2017

Shelton v. Galco, United States District Court, Northwestern District of Georgia, 2016

Kelly v. FMK, United States District Court, District of Georgia, 2015

Cooke v. Hickenlooper, United States District Court, District of Colorado, 2014

Walker v. Spikes, United States District Court, District of Nevada, 2014

Smith v. Wolf, United States District Court, District of Nevada, 2014

Schroer v. Wades, King County Superior Court, 2014

Nelson v. Glock, United States District Court, District of Oklahoma, 2013

Arbogast v. Jerry's Sports Inc., Lackawanna County Superior Court, 2012

Mantooth v. Glock, United States District Court, Eastern District of Michigan, 2011

Hayden v. Glock, Santa Clara Superior Court, 2011

Stoklund v. Thompson/Center, United States District Court, District of North Dakota, 2007

West v. NAA, United States District Court, District of Alaska, 2005

Smith v. Austin & Halleck, United States District Court, District of Oregon, 2005

## **Expert Witness Experience**

(Deposition, Court Testimony or Federal Court Report) continued;

Paderez v. SIGARMS, San Fernando Superior Court, 2004

Adames v. Beretta, Cook County Superior Court, 2004

Beauchamp v. Bersa, United States District Court, District of Colorado, 2004

Ryan v. Smith & Wesson, United States District Court, District of Pennsylvania, 2003

California Municipal Firearms Litigation, San Diego Superior Court, 2002

Stotts v. Heckler & Koch, United States District Court, Western District of Tennessee, 2002

Maxfield v. Bryco, Alameda Superior Court, 2002

Grunow v. Valor, Palm Beach Superior Court, 2001

Jewell v. Jackson Arms, Alameda Superior Court, 2002

Pinkerton v. Esber, Los Angeles Superior Court, 2001

Robinson v. Ryan, Orange County Superior Court, 2001

Atkien v. Heckler & Koch, United States District Court, District of Pennsylvania, 2001

McMahon v. Manning, Santa Barbara Superior Court, 2000

Huber v. Smith, Los Angeles Superior Court, 2000

Mathieu v. Beretta, United States District Court, District of Massachusetts, 1999

Dix v. Beretta, Alameda Superior Court, 1998, 2003, 2004

# *Michael Shain*

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## Curriculum Vitae

### **Qualifications (Expanded)**

- 1977 UCLA Match Pistol Team
- 1983 Orange County Peace Officers Academy - P.O.S.T approved Basic academy, successful completion is qualification for employment in any police agency in CA. Staff instructors from Huntington Beach PD, Santa Anna PD, Brea PD, La Habra PD, LAPD & Anaheim PD. Cadet classmates included Bell Gardens PD, Anaheim PD, Brea PD, La Habra PD, Newport Beach PD, Huntington Beach PD, Irvine PD, Santa Anna PD
- 1984 Assigned to Olympic Village Athlete Protection Detail (Special response team, counter terrorism task force deployment.)
- 1985 Assigned to LAPD Pacific Division, Mid-Watch Patrol (8UC49L)  
Patrolled housing projects in Mar Vista and Venice areas of Los Angeles, received calls for service and made crime broadcasts over LAPD frequency. Attended roll calls and briefings at LAPD Pacific Division. Booked arrests in LAPD stations and jail facilities.
- 1985 Worked joint foot patrol program with LAPD.
- 1989 Served on selection panel for Santa Monica Police Department recruitment of new rangemaster. Other panel members included U.S. Secret Service and Santa Monica PD.
- 2001 Invited by the American Bar Association to speak on Firearms Design Characteristics and Litigation.
- 2003 Teach and coordinate national armorers schools and develop tactical training program for O.F. Mossberg & Sons, Inc. (Guest instructor at the Ohio Peace Officers Training Academy, Alpharetta Public Safety Training Center, Tucson Public Safety Academy and Post certified instructor by the Missouri Department of Public Safety.)
- 2003 Federal Firearms License - Dealer
- 2004 Member Rocky Mountain 3 Gun Association (National rifle, pistol and shotgun competitions.)
- 2004 Attended International Association for Law Enforcement Firearms Instructors Annual Training Conference (Including 24 hours of advanced instructor training.)
- 2005 Guest Instructor – International Association for Law Enforcement Firearms Instructors Annual Training Conference.
- 2009 Member, Board of Directors, Camp Fickes Shooting Range.
- 2010 Federal Firearms License - Manufacturer
- 2011 Guest Instructor, International Association of Law Enforcement Firearms Instructors, Master Law Enforcement Instructor Program.
- 2013 Consultant, private shooting range development, Conifer, CO.
- 2014 Directed operations for Remington Arms/Freedom Group Warranty services in Colorado.

**Exhibit B**



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[www.renzullilaw.com](http://www.renzullilaw.com)

July 18, 2022

**VIA E-MAIL**

Amy K. Van Zant  
Orrick, Herrington & Sutcliff, LLP  
1000 Marsh road  
Menlo Park, CA 94025  
[avanzant@orrick.com](mailto:avanzant@orrick.com)

**Re: *Ghost Gunner Firearms Cases*  
Judicial Council Coordination Proceeding No. 5167**

Dear Amy:

This follows our letter addressed to you dated June 20, 2022. Enclosed herein is a draft copy of Juggernaut Tactical's Motion for Sanctions pursuant to California Code of Civil Procedure § 128.7. For the reasons set forth in our prior correspondence, as well as in the Report of Michael Shain, and the draft Motion for Sanctions, upon expiration of 21-days from the date of this letter, we will promptly file the enclosed motion seeking sanctions against Plaintiffs and their counsel. This notice of intent to file the enclosed Motion for Sanctions is in compliance with the "safe harbor" provision of Section 128.7.

As previously made unequivocally clear, Juggernaut Tactical is not a proper defendant in this case, and should be immediately dismissed. We remain optimistic that Plaintiffs and their counsel will appreciate this undeniable fact, and will voluntarily dismiss Juggernaut Tactical without further delay. Should Plaintiffs not do so, however, the Motion for Sanctions will be filed upon lapse of the "safe harbor" period.

Should you like to discuss further, please contact me. We look forward to your anticipated cooperation.

Very truly yours,

**RENZULLI LAW FIRM, LLP**

A handwritten signature in black ink, appearing to read 'Howard Schilsky', written over a horizontal line.

Howard Schilsky



***Ghost Gunner Firearms Cases***

cc:     Shayan Said ([ssaid@orrick.com](mailto:ssaid@orrick.com))  
          Estee Lewis ([estee@ca-lawyer.com](mailto:estee@ca-lawyer.com))  
          Catie Barr ([catie@ca-lawyer.com](mailto:catie@ca-lawyer.com))  
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          Desiree Caudillo ([dcaudillo@eghblaw.com](mailto:dcaudillo@eghblaw.com))

1 **Re: Ghost Gunner Firearms Cases**  
2 **Orange County Superior Court Case No. JCCP 5167**

3 **PROOF OF SERVICE – CCP §1013(a)(3)**

4 STATE OF CALIFORNIA/COUNTY OF Los Angeles

5 I am a citizen of the United States and an employee in the County of Los Angeles. I am  
6 over the age of eighteen (18) years and not a party to the within action. My business address is  
7 EDLIN GALLAGHER HUIE + BLUM LLP, 515 S. Flower Street, Suite 1020, Los Angeles,  
8 California 90071.

9 On the date set forth below, I served the within:

10 **DECLARATION OF HOWARD B. SCHILSKY IN SUPPORT OF DEFENDANT  
11 JUGGERNAUT TACTICAL, INC.'S NOTICE OF MOTION AND MOTION FOR  
12 SANCTIONS PURSUANT TO CALIFORNIA CODE OF CIVIL PROCEDURE  
13 SECTION 128.7**

14 on the following parties:

15 SEE ATTACHED SERVICE LIST

16        **BY PERSONAL SERVICE:** I caused a copy of said documents to be hand  
17 delivered to the interested party at the address set forth above.

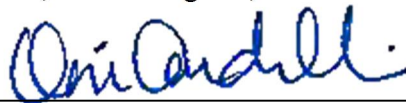
18   X   **BY ELECTRONIC MAIL:** Based upon stipulation and agreement of the parties for  
19 service by electronic transmission, I caused said document(s) to be sent to the persons  
20 at the electronic mail address listed above. I did not receive within a reasonable  
21 amount of time after the transmission, any electronic message or other indication that  
22 the transmission was not successful.

23        **BY MAIL:** I caused such envelope to be deposited in the mail at Los Angeles,  
24 California. I am readily familiar with the firm's practice for collection and processing  
25 of correspondence for mailing. It is deposited with the U.S. Postal Service on that  
26 same day in the ordinary course of business.

27        **BY FEDERAL EXPRESS:** I caused such envelope to be deposited in the appropriate  
28 Federal Express envelope, to the Federal Express office located at 515 S. Flower  
Street, Suite 1020, Los Angeles, California 90071, to be delivered by the next business  
day. I am readily familiar with the firm's practice for collection and processing of  
correspondence for transmittal by Federal Express. It is deposited with Federal  
Express on that same day in the ordinary course of business.

       **BY FACSIMILE:** I caused said documents to be sent via facsimile to the interested  
party at the facsimile number set forth below.

I declare under penalty of perjury that the foregoing is true and correct and that this  
document is executed on August 17, 2022, at Los Angeles, California.



DESIREE CAUDILLO

1 **SERVICE LIST**

2 Ghost Gunner Firearms Cases

3 Our Clients: Juggernaut Tactical Inc.

4 Orange County Superior Court Case No. JCCP 5167 (30-2019-01111797)

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38 *Inc.*

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