

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ESTADOS UNIDOS MEXICANOS,

Plaintiff,

v.

SMITH & WESSON BRANDS, INC.;
BARRETT FIREARMS MANUFACTURING,
INC.; BERETTA U.S.A. CORP.; BERETTA
HOLDING S.P.A.; CENTURY
INTERNATIONAL ARMS, INC.; COLT'S
MANUFACTURING COMPANY LLC;
GLOCK, INC.; GLOCK GES.M.B.H.; STURM,
RUGER & CO., INC.; WITMER PUBLIC
SAFETY GROUP, INC. D/B/A INTERSTATE
ARMS,

Defendants.

Civil Action No: 1:21-cv-11269-FDS

**MOTION FOR LEAVE TO FILE AMICI CURIAE IN SUPPORT OF
PLAINTIFF'S OPPOSITIONS TO DEFENDANTS' MOTIONS TO DISMISS**

Proposed amici curiae Chesa Boudin, District Attorney, San Francisco County, California; Laura Conover, County Attorney, Pima County (Tucson), Arizona; Diana Becton, District Attorney, Contra Costa County, California; George Gascón, District Attorney, Los Angeles County, California; Beth McCann, District Attorney, 2nd Judicial District (Denver), Colorado; Deborah Gonzalez, District Attorney, Western Judicial Circuit (Athens), Georgia; Rebecca Like, Acting Prosecuting Attorney, County of Kaua'i, Hawaii; Kim Foxx, State's Attorney, Cook County (Chicago), Illinois; Marian Ryan, District Attorney, Middlesex County, Massachusetts; David Sullivan, District Attorney, Northwestern District, Massachusetts; Eli Savit, Prosecuting Attorney, Washtenaw County (Ann Arbor), Michigan; John Choi, County Attorney, Ramsey County (St. Paul), Minnesota; Matthew Van Houten, District Attorney,

Tompkins County, New York; Melinda Katz, District Attorney, Queens County, New York; Todd Williams, District Attorney, Buncombe County (Asheville), North Carolina; John Hummel, District Attorney, Deschutes County, Oregon; Mike Schmidt, District Attorney, Multnomah County (Portland), Oregon; Matt Ellis, District Attorney, Wasco County, Oregon; Lawrence S. Krasner, District Attorney, Philadelphia, Pennsylvania; Joe Gonzales, District Attorney, Bexar County (San Antonio), Texas; Mark Gonzalez, District Attorney, Nueces County (Corpus Christi), Texas; José Garza, District Attorney, Travis County (Austin), Texas; Sarah F. George, State's Attorney, Chittenden County (Burlington), Vermont; Joseph Platania, Commonwealth's Attorney, City of Charlottesville, Virginia; Steve Descano, Commonwealth's Attorney, Fairfax County, Virginia; Ramin Fatehi, Commonwealth's Attorney, City of Norfolk, Virginia; Dan Satterberg, Prosecuting Attorney, King County (Seattle), Washington, through undersigned counsel, respectfully request leave of this Court to submit the attached brief amici curiae in support of Plaintiff's Oppositions to Defendants' Motions to Dismiss.¹ The proposed brief is attached as Appendix 2 to this motion. In accordance with Local Rule 7.1(a)(2), amici have sought consent from Defendants, who do not object to the filing.

Pursuant to Local Rule 7.1(d), no request for oral argument is made. A Memorandum of Points and Authorities in support of the motion follows.

¹ The full list of amici is also attached hereto as Appendix 1.

MEMORANDUM OF POINTS AND AUTHORITIES

“[Federal district] courts have inherent authority and discretion to appoint amici.” *Bos. Gas Co. v. Century Indem. Co.*, No. 02–12062–RWZ, 2006 WL 1738312, at *1 n.1 (D. Mass. June 21, 2006); see *Mass. Food Ass’n v. Mass. Alcoholic Beverages Control Comm’n*, 197 F.3d 560, 567 (1st Cir. 1999) (“[A] court is usually delighted to hear additional arguments from able amici that will help the court toward right answers.”). “The role of an amicus curiae . . . is to assist the court in cases of general public interest by making suggestions to the court, by providing supplementary assistance to existing counsel, and by insuring a complete and plenary presentation of difficult issues so that the court may reach a proper decision.” *Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll.*, 308 F.R.D. 39, 52 (D. Mass. 2015) (citation and internal quotation marks omitted), *aff’d*, 807 F.3d 472 (1st Cir. 2015). Amici’s attached brief amply satisfies this role.

Amici—district attorneys in cities across the nation—have an interest in this proceeding. Defendants’ gun sales are resulting in transnational cartel violence and crime that are consuming the resources of our offices, harming people in our communities that we are duty bound to protect, and endangering law enforcement. Guns pumped into Mexico by Defendants are transported back across the border via the same underground networks used by Mexican cartels to funnel drugs into the United States. Those guns are then used in crimes committed in amici’s cities, particularly by street-level gangs serving as retail distributors and enforcers for Mexico’s transnational drug syndicates. Just as deadly are the drugs that travel with the guns—amici’s cities have seen alarming rises in fatal opioid overdoses and the rapid deterioration of neighborhoods affected by the drug trade.

Amici provide useful information to the Court regarding the lethal effects of Defendants' actions in their communities. Defendants assert that the Court lacks jurisdiction over Mexico's claims because they are not subject to personal jurisdiction in this District. However, as amici's experience reflects, Defendants' intentional and knowing actions have had a devastating impact in Mexico and communities across the United States, making Defendants subject to jurisdiction not only in this District, but many others. As law enforcement, amici are on the front lines of dealing with the consequences of Defendants' conduct and have a unique perspective that amici believe would benefit the Court. Defendants would have the Court believe that their arming of transnational criminals with weapons of war has no impact in the United States. This is not so: amici have seen firsthand the death and devastation wrought with Defendants' guns and the drugs Mexican cartels traffic relying on Defendants' guns. These harms should be taken into account in ruling on Defendants' motion to dismiss.

WHEREFORE, the proposed amici curiae respectfully request that this Court grant leave to file the attached brief.

Dated: January 31, 2022

Respectfully submitted,

Amici Curiae

By their attorneys,

/s/ Ellen V. Leonida

Ellen V. Leonida (admitted *pro hac vice*)

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CERTIFICATE OF SERVICE

I, Ellen V. Leonida, hereby certify that this document filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 31, 2022.

/s/ Ellen V. Leonida
Ellen V. Leonida

APPENDIX 1

APPENDIX 1: LIST OF *AMICI*

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Laura Conover

County Attorney, Pima County (Tucson), Arizona

Diana Becton

District Attorney, Contra Costa County, California

George Gascón

District Attorney, Los Angeles County, California

Former District Attorney, City and County of San Francisco, California

Former Chief, San Francisco Police Department, California

Former Chief, Mesa Police Department, Arizona

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APPENDIX 2

**IN THE UNITED STATES DISTRICT COURT
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Plaintiff,

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RUGER & CO., INC.; WITMER PUBLIC
SAFETY GROUP, INC. D/B/A INTERSTATE
ARMS,

Defendants.

Civil Action No: 1:21-cv-11269-FDS

**BRIEF OF DISTRICT ATTORNEYS AS AMICI CURIAE IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS**

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I. INTEREST OF THE AMICI CURIAE

Amici are prosecutors in cities across the nation that are devastated by the violence and crime directly resulting from Defendants' gun sales: Chesa Boudin, District Attorney, San Francisco County, California; Laura Conover, County Attorney, Pima County (Tucson), Arizona; Diana Becton, District Attorney, Contra Costa County, California; George Gascón, District Attorney, Los Angeles County, California; Beth McCann, District Attorney, 2nd Judicial District (Denver), Colorado; Deborah Gonzalez, District Attorney, Western Judicial Circuit (Athens), Georgia; Rebecca Like, Acting Prosecuting Attorney, County of Kaua'i, Hawaii; Kim Foxx, State's Attorney, Cook County (Chicago), Illinois; Marian Ryan, District Attorney, Middlesex County, Massachusetts; David Sullivan, District Attorney, Northwestern District, Massachusetts; Eli Savit, Prosecuting Attorney, Washtenaw County (Ann Arbor), Michigan; John Choi, County Attorney, Ramsey County (St. Paul), Minnesota; Matthew Van Houten, District Attorney, Tompkins County, New York; Melinda Katz, District Attorney, Queens County, New York; Todd Williams, District Attorney, Buncombe County (Asheville), North Carolina; John Hummel, District Attorney, Deschutes County, Oregon; Mike Schmidt, District Attorney, Multnomah County (Portland), Oregon; Matt Ellis, District Attorney, Wasco County, Oregon; Lawrence S. Krasner, District Attorney, Philadelphia, Pennsylvania; Joe Gonzales, District Attorney, Bexar County (San Antonio), Texas; Mark Gonzalez, District Attorney, Nueces County (Corpus Christi), Texas; José Garza, District Attorney, Travis County (Austin), Texas; Sarah F. George, State's Attorney, Chittenden County (Burlington), Vermont; Joseph Platania, Commonwealth's Attorney, City of Charlottesville, Virginia; Steve Descano, Commonwealth's Attorney, Fairfax County, Virginia; Ramin Fatehi, Commonwealth's Attorney,

City of Norfolk, Virginia; Dan Satterberg, Prosecuting Attorney, King County (Seattle), Washington.¹

Amici's jobs are to protect our cities from crime and violent gangs. As detailed below, we have an interest in this proceeding because Defendants' gun sales are resulting in transnational cartel violence and crime that are consuming the resources of our offices, harming the people in our cities, and endangering law enforcement.

II. INTRODUCTION

We live in a global economy: labor, production, and consumption transcend the borders of our nation. Crime crosses borders, too; not just into border towns, but across the entire country, through sophisticated criminal networks. It is hardly a surprise, then, that when Defendants export scores of military-style weapons to Mexico, they are importing human suffering into the United States. Their guns are being turned on people in our cities and the brave law enforcement officers who protect them, and they are fueling the drug carnage ravaging this country. Defendants want to pretend that when you fire guns into the air, the bullets do not land. That is wrong. Defendants' profiteering is paid for in U.S. blood.

Defendants and Mexican cartels are involved in a deadly exchange: Defendants supply the assault weapons and sniper rifles that Mexican cartels use to carry out unlawful trafficking; the cartels, in turn, blanket American communities with lethal drugs and violence. As Plaintiff Estados Unidos Mexicanos (Mexico) pleads in its Complaint, Defendants design and distribute weapons of war with full knowledge that they will be used by cartels in the bloody battle over the lucrative drug trade in the United States.

¹ No person or entity other than amici and their counsel authored the brief in whole or in part. No person or entity other than amici and their counsel contributed money intended to fund preparing or submitting the brief.

Our offices have seen firsthand the catastrophic effect that Defendants' conduct has had in our communities: the escalating violence and turf wars fought with Defendants' guns; the destructive effects of narcotics, including fentanyl, that Mexican cartels import in exchange for Defendants' guns; and the violence that inevitably ensues when cartel members, wielding Defendants' guns, protect their trafficking routes. Amici are tasked with protecting our communities from the violence wrought with Defendants' guns as part of the drug trade and from the devastating impact of the drugs themselves.

III. THIS COURT HAS JURISDICTION OVER DEFENDANTS BECAUSE THEIR GUN SALES TO MEXICO ARE CAUSING PROFOUND HARM HERE

Following their decades-old playbook, Defendants assert that the Court lacks jurisdiction over Mexico's claims because they are not subject to personal jurisdiction in this District. (See Dkt. Nos. 57 (Sturm, Ruger & Company, Inc.); 59 (Barret Firearms Manufacturing, Inc.); 63 (Glock, Inc.); 65 (Colt's Manufacturing Company LLC); 71 (Smith & Wesson Brands, Inc.); 73 (Beretta U.S.A. Corp.).) Not so. Defendants have intentionally flooded Mexico with guns, which directly causes substantial harm in the United States. A common cycle has emerged: Defendants' guns are purchased in the United States, often with the proceeds from illegal drug sales.² They are then sent down to Mexico to arm the country's deadly cartels, often in exchange for more drugs to fund the next arms deal.³ Once the cartels get their hands on Defendants' guns, they use

² See, e.g., U.S. Att'y for the C.D. Cal., *Indictment Names Six in Scheme to Provide High-Powered Firearms and Huge Quantities of Ammunition to Mexican Drug Cartel*, (Jan. 24, 2022), <https://www.justice.gov/usao-cdca/pr/indictment-names-six-scheme-provide-high-powered-firearms-and-huge-quantities>; Beth Warren, *Where Do Mexican Drug Cartels Get Their Guns? Often, the United States*, USA TODAY (Aug. 25, 2021), <https://www.usatoday.com/story/news/nation/2021/08/25/american-guns-help-arm-mexican-drug-cartels-including-cjng/5586129001/>.

³ See, e.g., U.S. Att'y for the N.D. Cal., *Nineteen South Bay Residents Charged in Alleged Scheme to Funnel Drugs into U.S and Firearms to Mexico* (Feb. 11, 2021),

them to build up their transnational drug operations and export deadly drugs to the United States.⁴ Because Mexican cartels rely on U.S. street-level gangs to sell their drugs, guns smuggled over the border frequently boomerang back into amici's communities. They are subsequently used to commit crimes here, including attacking law enforcement and rival gangs in the drug wars carried out on the streets of our cities.

Because Defendants' have, for years, intentionally put guns into the hands of Mexican cartels, which have caused substantial and easily foreseeable harm in the United States, it is only fair that Defendants should be held to answer anywhere that they have caused such injuries. *See Asahi Metal Indus. Co. v. Superior Ct. of Cal.*, 480 U.S. 102, 112 (1987) (O'Connor, J., plurality op.) ("placement of a product into the stream of commerce" combined with "[a]dditional conduct of the defendant" may indicate an intent or purpose to serve the market in the forum State); *see also Heins v. Wilhelm Loh Wetzlar Optical Mach. GmbH & Co. KG.*, 26 Mass. App. Ct. 14, 22 (1988); *Levin v. Harned*, 292 F. Supp. 2d 220, 229 (D. Mass. 2003). Any argument to the contrary is belied by decades of evidence establishing that Defendants intended for their military-style weapons to be bought and sold by members of the Mexican cartels, which would in turn bring violence and drugs back into each district in the United States, including this District.

It is well documented that Mexican cartels are among American gun manufacturers' best customers. Defendants have known this for years, as thousands of their guns are going into

<https://www.justice.gov/usao-ndca/pr/nineteen-south-bay-residents-charged-alleged-scheme-funnel-drugs-us-and-firearms-mexico>.

⁴ Council on Foreign Rel., *Mexico's Long War: Drugs, Crime, and the Cartels* (Feb. 2021), <https://www.cfr.org/background/mexicos-long-war-drugs-crime-and-cartels>; Warren, *supra* note 2.

Mexico *on a daily basis*.⁵ It is also well documented that, for years, gun manufacturers—including Defendants, who overwhelmingly dominate that market—have made more guns than there are people in this country.⁶ One study calculates that nearly half of all U.S. gun shops, stocked with Defendants’ guns, depend on illegal sales to Mexico to stay in business.⁷ Indeed, the Bureau of Alcohol, Tobacco, Firearms and Explosives reports that firearms are trafficked down to Mexico from almost every state, including Alaska.⁸ On this score, the Court can make only one plausible inference: that Defendants have knowingly and intentionally manufactured weapons of war with the intent that they will be trafficked into Mexico for use by the cartels.

Accordingly, under bedrock jurisdictional principles, Defendants are subject to this Court’s jurisdiction. Defendants sell guns in this District (as well as districts across the country) knowing and intending that those guns will illegally make their way to Mexico and into the hands of international gangsters. Once in the hands of members of the Mexican cartels, Defendants’ guns are used to facilitate the flood of drugs and violence back into the United States. Transnational cartels have, with the help of Defendants’ guns, established a two-way

⁵ David Gagne, *2,000 Illegal Weapons Cross US-Mexico Border Per Day: Report*, INSIGHT CRIME (Jan. 22, 2015), <https://insightcrime.org/news/analysis/2000-illegal-weapons-cross-us-mexico-border-every-day/>; see Gabriela Martinez, *The Flow of Guns from the U.S. to Mexico Is Getting Lost in the Border Debate*, PBS (July 2, 2019), <https://www.pbs.org/newshour/politics/the-flow-of-guns-from-the-u-s-to-mexico-is-getting-lost-in-the-border-debate>.

⁶ Christopher Ingraham, *There Are More Guns Than People in The United States, According to a New Study of Global Firearm Ownership*, WASH. POST (June 19, 2018), <https://www.washingtonpost.com/news/wonk/wp/2018/06/19/there-are-more-guns-than-people-in-the-united-states-according-to-a-new-study-of-global-firearm-ownership/>.

⁷ Topher McDougal et. al., *The Way of the Gun: Estimating Firearms Traffic Across the U.S.-Mexico Border*, at 2 (Mar. 2013), https://catcher.sandiego.edu/items/peacestudies/way_of_the_gun.pdf.

⁸ Conrad Wilson, *Federal Prosecutors Seek Prison Sentence for Man Who Trafficked Oregon Guns to Mexican Drug Cartel*, OPB (Dec. 2021), <https://www.opb.org/article/2021/12/06/federal-prosecutors-seek-sentence-for-man-who-trafficked-oregon-guns-to-mexican-drug-cartel/>.

network whereby drugs and violence flow back and forth between Mexico and the United States. Defendants have not merely ignored this problem but continue to fuel it by manufacturing and marketing the military-style guns that they know and intend will be obtained by the cartels. Defendants' actions are devastating amici's communities, as well as communities across the country, and they can no longer hide behind their unpersuasive jurisdictional arguments.

A. The Guns That Defendants Sell into Mexico Return to the U.S. and Wreak Havoc in Amici's Communities

Substantial evidence compiled by reporters, non-governmental organizations, and law enforcement demonstrates that transnational cartels are using Defendants' guns, funneled from the United States to Mexico and then back to the United States again, to further their illicit operations throughout the United States. Arrests from this District as well as in amici's districts are illustrative. For example, in April 2021, an individual with ties to the Jalisco New Generation Cartel (CJNG) was arrested in Holyoke, Massachusetts, and found in possession of hundreds of grams of the deadly drug fentanyl as well as multiple weapons of war, including an AR-15 assault rifle and handguns equipped with laser sights and capable of carrying large-caliber ammunition.⁹ Just a month earlier, eight individuals with "direct ties to a Mexican cartel" were arrested in Boston and found in possession of hundreds of thousands of dollars' worth of fentanyl.¹⁰

On the other side of the country, federal agents in the South Bay Area of California arrested 19 individuals with ties to the Sinaloa Cartel's drug and firearm trafficking operations in

⁹ U.S. Att'y for the D. Mass, *Holyoke Man Arrested for Fentanyl Conspiracy* (Apr. 9, 2021), <https://www.justice.gov/usao-ma/pr/holyoke-man-arrested-fentanyl-conspiracy>.

¹⁰ U.S. Att'y for the D. Mass, *Eight Charged with Conspiring to Distribute Fentanyl and Cocaine and Money Laundering Conspiracy* (Mar. 2021), <https://www.justice.gov/usao-ma/pr/eight-charged-conspiring-distribute-fentanyl-and-cocaine-and-money-laundering-conspiracy>.

February 2021.¹¹ These individuals were in possession of 16 military-style guns, which were purchased in the United States and combined with grenade launchers that had been transported to California from Mexico.¹² Also in 2021, federal agents in San Diego arrested dozens of individuals with ties to the Sinaloa Cartel, and seized from them 90 firearms.¹³ In 2021 alone, agents have seized more than 100 guns from Mexican cartel operatives in California—and these are only the guns recovered from individuals who got caught. The likelihood that any of these guns were purchased in Mexico is extremely low—there is only one gun shop in all of Mexico, which requires months of background checks before a customer can purchase a firearm.¹⁴ That lone gun shop sells, on average, 38 firearms each day; by contrast, approximately 580 U.S. firearms are smuggled into Mexico daily.¹⁵

In 2021, Oregon prosecutors charged individuals with links to CJNG with purchasing approximately 150 weapons, including Barrett sniper rifles, grenades, and belt-fed machine guns from shops in the Portland and Salem areas, stripping them of their serial numbers, and sending them to their cartel bosses in Mexico.¹⁶ These are not isolated incidents—law-enforcement agents have been regularly seizing firearms during the arrests of cartel members for more than a decade.¹⁷

¹¹ U.S. Att’y for the N.D. Cal., *supra* note 3.

¹² *Id.*

¹³ U.S. Att’y for the S.D. Cal., *Sixty Defendants Charged in Nationwide Takedown of Sinaloa Cartel Methamphetamine Network* (June 29, 2021), <https://www.justice.gov/usao-sdca/pr/sixty-defendants-charged-nationwide-takedown-sinaloa-cartel-methamphetamine-network>.

¹⁴ *Mexico Has Just One Gun Shop, Yet Is Awash in US Firearms*, CRIME REPORT (May 24, 2018), <https://thecrimereport.org/2018/05/24/mexico-has-just-one-gun-shop-yet-is-awash-in-us-firearms/>.

¹⁵ *Id.*

¹⁶ Wilson, *supra* note 8.

¹⁷ See, e.g., Att’y Gen. of Cal., *Brown Announces 16 Indictments, 550 Pound Drug Seizure Following Infiltration of Sinaloa Cartel* (Aug. 26, 2009) (state law enforcement agents in Imperial County arrested 16 members of the Sinaloa Cartel who were in possession of 9

As Defendants' military-style guns proliferate in amici's communities and across the country, so too do deadly shootings. According to the Gun Violence Archive, there were more than 20,000 gun deaths (not including suicides) in the United States in 2021, which represents the highest number in years.¹⁸ In San Francisco alone, by even the most conservative estimate, homicides were up more than 16% in 2021 as compared to the previous year,¹⁹ and most of these homicides were committed on neighborhood blocks and in parks.²⁰ As stated by a local law-enforcement officer working in California's "Emerald Triangle" (comprising Mendocino, Humboldt, and Trinity Counties), officers are responding to calls regarding "people in gunfights on a regular basis," much of which is linked to Mexican cartels' illicit operations.²¹ Fueled by easy access to guns, at least nine major cities broke their previous annual homicide records in

firearms), <https://oag.ca.gov/news/press-releases/brown-announces-16-indictments-550-pound-drug-seizure-following-infiltration>; Michael Isikoff, *U.S.: Gun Raids Show Cartels at Work in Arizona*, NBC News (Jan. 25, 2011), <https://www.nbcnews.com/id/wbna41257218> (twenty arrests made in Arizona of individuals attempting to smuggle hundreds of assault rifles into Mexico); DEA & FBI Joint Intelligence Report, *Cartels and Gangs in Chicago*, at 7 (May 2017), <https://www.dea.gov/sites/default/files/2018-07/DIR-013-17%20Cartel%20and%20Gangs%20in%20Chicago%20-%20Unclassified.pdf> (federal and state officer arresting dozens of individuals in Chicago with connections to the Sinaloa Cartel in possession of heroin, cocaine, millions of dollars, and firearms); U.S. Att'y for the S.D. Tex., *Three Charged in Conspiracy to Purchase \$500,000 in Weapons for Cartel* (July 29, 2021), <https://www.justice.gov/usao-sdtx/pr/three-charged-conspiracy-purchase-500000-weapons-cartel>.

¹⁸ Gun Violence Archive, *Number of Deaths in 2021*, <https://www.gunviolencearchive.org/reports/number-of-gun-deaths?year=2021> (last visited January 31, 2021).

¹⁹ S.F. Police Dep't, *Crime Dashboard*, <https://www.sanfranciscopolice.org/stay-safe/crime-data/crime-dashboard> (last visited January 31, 2021).

²⁰ Aben  Clayton, *Inside the San Francisco Bay Area's Pandemic Murder Surge: 'No One Knows This Pain But Us'*, GUARDIAN (Sept. 28, 2021), <https://www.theguardian.com/us-news/2021/sep/28/san-francisco-bay-area-gun-violence-murders-2020>.

²¹ Beth Warren, *Marijuana Wars: Violent Mexican Drug Cartels Turn Northern California into 'The Wild West'*, USA TODAY (Dec. 2021), <https://www.usatoday.com/in-depth/news/nation/2021/12/19/mexican-drug-cartels-move-in-on-californias-shadow-marijuana-industry/8960873002/>.

2021: Austin, Texas; Philadelphia, Pennsylvania; Indianapolis, Indiana; Louisville, Kentucky; Columbus, Ohio; Albuquerque, New Mexico; Tucson, Arizona; Rochester, New York; and Portland, Oregon.²²

The prevalence of guns used in connection with crime—and their disastrous effect on amici’s communities—is well known to Defendants. For decades, they (and the general public) have known that their guns far too easily fall into the wrong hands and are used for crime. As Judge Jack Weinstein explained in 2003, “guns move quickly from the legal to the illegal market; 13% were recovered [in connection with criminal investigations] within one year of their sale, and 30% were recovered within 3 years of their first sale.” *N.A.A.C.P. v. AcuSport, Inc.*, 271 F. Supp. 2d 435, 522 (E.D.N.Y. 2003). And, as Mexico observes in its Complaint, Defendants’ executives have for decades noted the ease with which their guns become “black market” firearms. (Compl. ¶ 87.) Yet, Defendants have taken no steps to prevent these harms to our communities, and amici are forced to divert much of their limited resources to combatting gun violence.

What better illustration to prove this point than the instant case? Mexico has one gun store and issues fewer than 50 permits per year. It is *Defendants’* guns that end up in Mexico in dangerous criminals’ hands and then make their way *back up* to amici’s communities, where they are used to inflict untold violence. Defendants have made it very clear that without Court intervention, they will continue to sell their guns, which they know will illegally pour into Mexico and end up back in our communities. Thus, the scourge of gun violence will continue.

²² Priya Krishnakumar et. al., *Fueled by Gun Violence, Cities Across the US Are Breaking All-Time Homicide Records This Year*, CNN (Dec. 12, 2021), <https://www.cnn.com/2021/12/12/us/homicides-major-cities-increase-end-of-year-2021/index.html>.

Amici's efforts to curb this problem, just like Mexico's, cannot succeed in the face of the relentless flow of firearms from the Defendants to the cartels—absent the relief Mexico seeks here.

B. Defendants' Guns Flowing into Mexico Facilitate the Flow of Illicit Drugs from Mexico to the United States

The cartels' drug trade, which is plaguing U.S. cities., is directly facilitated by Defendants' guns. Cartels use Defendants' guns to attack law enforcement in Mexico and in the United States, protect their contraband and cash, and maintain control of distribution territories in the United States. As a result, drugs flow north via the same illicit networks that cartels use to send guns south.²³ As the U.S. Attorney for the Northern District of California put it, "[t]he two-way flow of drug shipments heading north [to the United States] and firearms, including assault weapons, sniper rifles and grenade launchers, heading south [to Mexico] is a *potently* dangerous situation."²⁴

1. Defendants' guns are integral to Mexican cartels' drug trafficking

Mexican cartels are the leading suppliers of cocaine, heroin, methamphetamine, and other illicit narcotics to the U.S.²⁵ Approximately 90-94% of the heroin consumed in the United States comes from Mexico, and, approximately 90 percent of cocaine trafficked to the United States comes through the Mexico/Central America corridor.²⁶ Mexican cartels have also taken over the

²³ U.S. Att'y for the N.D. Cal., *supra* note 3; Kevin Sieff & Nick Miroff, *The Sniper Rifles Flowing to Mexican Cartels Show a Decade of U.S. Failure*, WASH. POST (Nov. 19, 2020), <https://www.washingtonpost.com/graphics/2020/world/mexico-losing-control/mexico-drug-cartels-sniper-rifles-us-gun-policy/> ("Traffickers bring the guns southward along the same routes they use to move drugs north.").

²⁴ U.S. Att'y for the N.D. Cal., *supra* note 3 (emphasis added).

²⁵ Council on Foreign Rel., *supra* note 4.

²⁶ Adam Isaacson, *Four Common Misconceptions About U.S.-bound Drug Flows Through Mexico and Central America*, WOLA (June 20, 2017), <https://www.wola.org/analysis/four-common-misconceptions-u-s-bound-drug-flows-mexico-central-america/>.

highly lucrative business of producing fentanyl and distributing it into the United States.²⁷ After a Chinese crackdown in 2019, the Sinaloa Cartel and CJNG have increased their control over the export of the drug to the United States.²⁸ Once Mexican traffickers smuggle wholesale shipments of drugs into the United States, their U.S. affiliates and street gangs manage retail-level distribution in cities throughout the country.²⁹

The guns Defendants are sending into Mexico are critical to these operations. Mexican cartels use Defendants' weapons to carry out murders in Mexico and here. They have fought turf wars over this profitable business in every major city in the United States—using the guns supplied by Defendants. According to law enforcement reports, Mexican cartels have formed relationships with U.S.-based street gangs and prison gangs, using them to smuggle guns to the cartels, serve as retail-level drug distributors, collect illicit proceeds, and act as enforcers.³⁰ These deepening associations between Mexican cartels and U.S. gangs have sparked a rash of gun violence on the streets of amici's communities. For example, San Antonio, Texas, serves as a "major hub for drugs coming into the country," which are then re-distributed nationwide by a

²⁷ Unlike heroin, which requires acres of land to grow poppies and several months of cultivation, fentanyl requires a small workforce and infrastructure to set up a laboratory. A 2019 DEA report estimated that a fentanyl pill costs only \$1 to produce but can be resold in the U.S. for at least 10 times as much. Audrey Travère & Jules Giraudat, *Revealed: How Mexico's Sinaloa Cartel Has Created a Global Network to Rule the Fentanyl Trade*, GUARDIAN (Dec. 8, 2020), <https://www.theguardian.com/world/2020/dec/08/mexico-cartel-project-synthetic-opioid-fentanyl-drugs>.

²⁸ See Steven Dudley et. al., *Mexico's Role in the Deadly Rise of Fentanyl*, 4 (Feb. 11, 2019), https://www.wilsoncenter.org/sites/default/files/media/documents/publication/fentanyl_insight_c_rime_final_19-02-11.pdf.

²⁹ Travère & Giraudat, *supra* note 27.

³⁰ Nat'l Drug Intel. Ctr., *National-Level Gang-Drug Trafficking Organization Connections* (Apr. 2008), <https://www.justice.gov/archive/ndic/pubs27/27612/national.htm#foot6>.

network of street level gangs.³¹ The cartels' influence has led to an eruption of gun violence on the city's east side, with rival gangs fighting over who gets to sell drugs where.³² Experts estimate that drugs are related to approximately to 65-70% of all the violent crime committed in San Antonio.³³

To obtain a foothold in northern California, Mexican cartels have relied on connections with Sureño gangs based out of Southern California. The historic tension between Sureños and Norteños has caused bloodshed, including a January 2011 incident in San Jose where gang members working for a Mexican drug trafficking organization stormed a downtown nightclub over a drug debt. The ensuing gun shootout between rival gangs killed three people.³⁴

In Chicago, the ties between Mexican cartels and street level gangs have exacerbated an already dire gun violence issue. Chicago-based gangs such as the Gangster Disciples, the Vice Lords, and the Latin Kings receive shipments of drugs from Mexican cartels and fight for territory for local drug sales.³⁵ Handguns are the weapon of choice for gang members, but they have also been known to set up ambushes using assault rifles capable of piercing police body armor, including at funerals of rival gang members.³⁶ In 2016, Chicago saw a jump of more than

³¹ Max Massey, *Drugs, Cartels, and Gangs Continue to Be a Problem in Bexar County, Sheriff Salazar Says*, KSAT (Nov. 2021), <https://www.ksat.com/news/local/2021/11/21/drugs-cartels-and-gangs-continue-to-be-a-problem-in-bexar-county-sheriff-salazar-says/>.

³² Jessie Degollado, *DEA: Cartels at Root of San Antonio's East Side Violence*, KSAT (Dec. 2017), <https://www.ksat.com/news/2017/12/22/dea-cartels-at-root-of-san-antonios-east-side-violence/>.

³³ Yami Virgin, *DEA: Most Violent Crimes Committed By Gangs in SA*, FOX SAN ANTONIO (Feb. 4, 2020), <https://foxsanantonio.com/news/yami-investigates/most-violent-crimes-committed-by-gangs-in-sa>.

³⁴ Att'y Gen. of Cal., *California and the Fight Against Transnational Organized Crime* (Mar. 2014), https://oag.ca.gov/sites/all/files/agweb/pdfs/toc/report_2014.pdf.

³⁵ Jeremy Kryt, *How Mexican Cartels Prey on Chicago's Chaos*, DAILY BEAST (July 2017), <https://www.thedailybeast.com/how-mexican-cartels-prey-on-chicagos-chaos>.

³⁶ *Id.*

50 percent from the previous year in homicides, the majority of which were gang-related and perpetrated with guns.³⁷

Cities in North Carolina, including Charlotte, have seen an increase in gang violence related to the Sinaloa, CJNG, and Beltrán Leyva cartels.³⁸ In a particularly shocking recent example, a North Carolina teacher and basketball coach was killed in a shootout after trying to rob the home of a Mexican drug cartel member.³⁹

Additionally, proceeds made through street-level drug sales are often used to purchase Defendants' guns to then ship down to Mexico. For example, in January 2022, law enforcement agents arrested six individuals who had conspired to ship assault rifles, machine gun parts and accessories, and hundreds of thousands of rounds of assault rifle ammunition to Mexico.⁴⁰ These weapons were purchased using proceeds from illegal narcotics sales.⁴¹ Transnational cartels are relying on selling drugs on amici's streets so that they can afford to buy more of Defendants' guns.

As the DEA has noted, "as long as illicit drugs remain in high demand in America, street-level drug sales will continue to rank among the top criminal activities conducted by street gangs, who are lured by the prospect of the huge financial gains."⁴² Moreover, "the violence

³⁷ *Id.*

³⁸ [Catherine Welch](https://www.wfae.org/local-news/2021-04-15/do-drug-cartels-operate-in-north-carolina-in-wake-of-chaotic-shooting-we-ask-an-expert), *Do Drug Cartels Operate in North Carolina? In Wake of Deadly Shooting, We Ask an Expert*, WFAE 90.7 (Apr. 2021), <https://www.wfae.org/local-news/2021-04-15/do-drug-cartels-operate-in-north-carolina-in-wake-of-chaotic-shooting-we-ask-an-expert>.

³⁹ Wilson Wong, *Teacher Killed in 'Old Western Shootout' After Trying to Rob Mexican Drug Cartel, Authorities Say*, NBC NEWS (Apr. 2021), <https://www.nbcnews.com/news/us-news/teacher-killed-old-western-shootout-after-trying-rob-mexican-drug-n1264151>.

⁴⁰ U.S. Att'y for the C.D. of Cal., *supra* note 2.

⁴¹ *Id.*

⁴² DEA, *2019 National Drug Threat Assessment* (Dec. 2019), https://www.dea.gov/sites/default/files/2020-01/2019-NDTA-final-01-14-2020_Low_Web-DIR-007-20_2019.pdf.

associated with drug trafficking that is visited on communities around the country will only increase as street, prison, and outlaw motorcycle gangs clash viciously in their quest to control the largest and most lucrative territories.”⁴³ Defendants, whose guns are used by Mexican cartels and their U.S. gang counterparts to advance their drug trade, profit directly from this bloodshed.

2. Where there are drugs, there are guns

At each significant drug-related arrest involving transnational cartels operating in the United States, numerous guns (including military-style weapons) are recovered. For example, in October, the Mexican Army and the National Guard raided a drug lab set up in an ostensibly middle-class home in Culiacán, the capital of northwest Sinaloa.⁴⁴ In the home, troops seized 118 kilograms of fentanyl, in what is being heralded as the largest seizure of pure fentanyl in history.⁴⁵ In tandem with the Mexican raid, U.S. federal agents arrested 17 individuals in Missouri, Arizona, and California, and recovered 50 firearms in connection with the arrests.⁴⁶

In March 2020, the DEA announced the results of Project Python, a multilateral interagency operation encompassing all global investigations and related disruption activities targeting CJNG.⁴⁷ Project Python resulted in 600 arrests and 350 indictments throughout the United States, including in California, Texas, Illinois, and New Jersey, and seizures of more than

⁴³ *Id.*

⁴⁴ Parker Asman, *What Does Massive Fentanyl Seizure Say About US-Mexico Security Relations?* INSIGHT CRIME (Nov. 2021), <https://insightcrime.org/news/massive-seizure-fentanyl-us-mexico-security/>.

⁴⁵ *Id.*

⁴⁶ U.S. Att’y for the E.D. Mo., *Agents Arrest 17 People in Large-Scale Multi-State Drug Trafficking Ring Involving Fentanyl, Heroin, Crystal Methamphetamine and Firearms*, (Oct. 25, 2021), <https://www.justice.gov/usao-edmo/pr/agents-arrest-17-people-large-scale-multi-state-drug-trafficking-ring-involving>.

⁴⁷ U.S. Dep’t of Just., *DEA-Led Operation Nets More Than 600 Arrests Targeting Cártel Jalisco Nueva Generación* (Mar. 11, 2020), <https://www.justice.gov/opa/pr/dea-led-operation-nets-more-600-arrests-targeting-c-rtel-jalisco-nueva-generaci-n>.

15,000 kilos of meth and nearly \$20 million in illicit funds.⁴⁸ Of course, multiple firearms, including military-style weapons, were recovered at the arrest sites, including 18 firearms in San Diego alone.⁴⁹

3. The drugs Mexican cartels are importing, facilitated and protected by Defendants' guns, cause acute harm in our communities

Easy access to Defendants' guns has allowed Mexican cartels to realize their ultimate goal: becoming primary distributors of the opioids that are decimating amici's communities. In the United States, Customs and Border Protection estimates that seizures of fentanyl at the southern border have increased by 456% from 2018 to 2021.⁵⁰ Amici have seen increases in seizures in their own communities as well. In December 2021, for example, Arizona-based federal and local law enforcement agents made a record seizure of almost 1.7 million fentanyl pills and 10 kilograms of fentanyl powder in a single investigation.⁵¹ In October 2021, drug

⁴⁸ *Id.*; see also Nina Golgowski, *Feds Arrest over 600 Alleged Mexican Cartel Members Across U.S.*, HUFFINGTON POST (Mar. 2020), https://www.huffpost.com/entry/project-python-dea-drug-cartel-arrests_n_5e6a3494c5b6bd8156f29013.

⁴⁹ *DEA's 'Project Python' Nets 130 Arrests in San Diego and Imperial Counties, Plus 3K+ Pounds of Meth*, NBC SAN DIEGO (Mar. 11, 2020), <https://www.nbcsandiego.com/news/local/photos-deas-project-python-nets-130-arrests-in-san-diego-and-imperial-counties-plus-3k-pounds-of-meth/2283454/>; Erik Avancier, *Guns, Drugs, Stolen Property Seized in Federal Raid on WestSide*, NEWS4JAX (Mar. 11, 2020), <https://www.news4jax.com/news/2020/03/11/guns-drugs-stolen-property-seized-in-federal-raid-on-westside/>.

⁵⁰ U.S. Customs and Border Prot., *Drug Seizure Statistics* (Jan. 2022), <https://www.cbp.gov/newsroom/stats/drug-seizure-statistics>.

⁵¹ Jodie Underwood, *Record Fentanyl Seizure by DEA Phoenix, Scottsdale Police & the Arizona Attorney General's Office as DEA Announces Nationwide Public Safety Surge* (Dec. 2021), <https://www.dea.gov/press-releases/2021/12/17/record-fentanyl-seizure-dea-phoenix-scottsdale-police-arizona-attorney>.

enforcement agents seized more than 9,000 fentanyl-laced pills and 2 kilograms of pure fentanyl in the Atlanta area in one day alone.⁵²

The fentanyl trafficked by Mexican cartels, has contributed to the devastating effects synthetic opioids are having on amici's communities. Since 1999, the rate of drug overdoses in the United States has nearly quadrupled.⁵³ From April 2020 through March 2021, there were nearly 97,000 drug overdose deaths in the United States, and 75% of those involved an opioid. In the same 12-month period the year before, 73,000 overdose deaths were reported, with 71% involving an opioid.⁵⁴ The COVID-19 pandemic has only exacerbated this issue, as people have struggled with isolation, economic precarity, and lack of access to services. As COVID-19 ravaged the county, the drug epidemic quietly took more lives. According to the Centers for Disease Control and Prevention, more than 100,000 Americans died of drug overdoses during the 12 months following the COVID-19 lockdowns, the most overdose deaths ever recorded in a one-year span.⁵⁵

The devastating consequences of this crisis for amici's communities goes beyond overdoses. Open-air drug markets and public drug use "are major contributors to the trauma, insecurity, and frustration experienced by many of those who spend time" in communities struck

⁵² Rob DiRienzo, 'Historic' amount of pills laced with fentanyl seized in Atlanta metro area FOX5 ATLANTA (Oct. 2021), <https://www.fox5atlanta.com/news/feds-seize-historic-amount-of-fake-pills-laced-with-fentanyl-in-atlanta-metro-area>.

⁵³ Ctrs. for Disease Control & Prevention, *Understanding the Epidemic* (Mar. 2021), <https://www.cdc.gov/opioids/basics/epidemic.html>.

⁵⁴ Ctrs. for Disease Control and Prevention, *Vital Statistics Rapid Release, Provisional Drug Overdose Death Count* (January 12, 2022), <https://www.cdc.gov/nchs/nvss/vsrr/drug-overdose-data.htm#dashboard>.

⁵⁵ Ctrs. for Disease Control & Prevention, *Drug Overdose Deaths in the U.S. Top 100,000 Annually* (Nov. 2021), https://www.cdc.gov/nchs/pressroom/nchs_press_releases/2021/20211117.htm.

by the opioid epidemic.⁵⁶ Indeed, there is no greater illustration of those realities than the Tenderloin neighborhood in San Francisco. The Tenderloin, with a population of 45,587 within a square mile, is the most densely populated area of San Francisco.⁵⁷ The explosion in drug use in the Tenderloin has led to several public health crises, including streets littered with feces, used needles, trash, and rodent infestations.⁵⁸ Communicable diseases spread more easily in this environment, including COVID-19, but also tuberculosis, hepatitis, and HIV.⁵⁹ And Tenderloin residents lack the services necessary to combat these health crises. “[T]here are many unmet community health needs that the [Tenderloin] struggles with, thus engendering a cycle of poverty and worsening health outcomes, and still more poverty.”⁶⁰

It is undisputed that the flow of illegal drugs from Mexico to the United States is built on the back of the cartels’ possession of Defendants’s guns. To contain the disastrous impact that the

⁵⁶ *A Report from the San Francisco Street-Level Drug Dealing Task Force* (Jun. 2021), [https://oewd.org/sites/default/files/SF%20Street-Level%20Drug%20Dealing%20Task%20Force%20Report%20\(June%2030%202021\).pdf](https://oewd.org/sites/default/files/SF%20Street-Level%20Drug%20Dealing%20Task%20Force%20Report%20(June%2030%202021).pdf).

⁵⁷ Christopher Cook, *What Crowding Looks Like During a Pandemic: Dismal Days in the Tenderloin*, S.F. PUB. PRESS (Aug. 8, 2020), <https://www.sfpublishpress.org/what-crowding-looks-like-during-a-pandemic-dismal-days-in-the-tenderloin/>.

⁵⁸ Adam Andrzejewski, *Mapping San Francisco's Human Waste Challenge - 132,562 Cases Reported In The Public Way Since 2008*, FORBES (Apr. 2019), <https://www.forbes.com/sites/adamandrzejewski/2019/04/15/mapping-san-franciscos-human-waste-challenge-132562-case-reports-since-2008/?sh=5e1bb4655ea5>; *Mapping San Francisco's Homeless Hypodermic Needle Challenge - 30,000 Case Reports Of Needles In The Public Way Since 2011*, OPENTHEBOOKS.COM (Apr. 2019), <https://www.openthebooks.com/mapping-san-franciscos-homeless-hypodermic-needle-challenge--30000-case-reports-of-needles-in-the-public-way-since-2011/>.

⁵⁹ Kevin Fagan, *Overcrowding on San Francisco's Tenderloin Streets — A Bad Scene Getting Worse in the Coronavirus Crisis*, S.F. CHRONICLE (Apr. 2020), <https://www.sfchronicle.com/bayarea/article/Overcrowding-on-San-Francisco-s-Tenderloin-15193473.php>.

⁶⁰ Joya Esagoff, *The Vicious Cycle of Poverty and Unmet Community Health Needs in San Francisco's Tenderloin (TL) Neighborhood: Solutions Based on Stakeholder Perceptions* at 5, UNIV. S.F. (Aug. 7, 2020), <https://repository.usfca.edu/cgi/viewcontent.cgi?article=2283&context=capstone>.

prevalence of these deadly drugs has had in amici's communities, we must confront Defendants' complicity in arming the drug syndicates responsible for blanketing our communities with these drugs.

CONCLUSION

Mexico's claims present a truism—when you put assault weapons into commerce, they will kill people. This truth is all the more profound when you are arming violent criminal gangs that operate across borders. As the people who confront this truth on a daily basis, amici urge the Court not to turn away from it. The Court should reject Defendants' jurisdictional arguments and deny Defendants' motion to dismiss.

Dated: January 31, 2022

Respectfully submitted,

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