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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR THURSTON COUNTY

RSR GROUP, INC., a Delaware for-profit corporation,

Petitioner,

v.

WASHINGTON STATE ATTORNEY GENERAL'S OFFICE, a Washington state agency,

Respondent.

No.

PETITION FOR DECLARATORY AND INJUNCTIVE RELIEF AND TO SET ASIDE CIVIL INVESTIGATIVE DEMAND FOR INTERROGATORIES AND PRODUCTION OF DOCUMENTS

Petitioner, RSR GROUP, INC., a Delaware for-profit corporation (“RSR Group”), by and through its attorneys, Corr Cronin LLP, 1015 Second Avenue, Floor 10, Seattle, WA 98104, and Renzulli Law Firm, LLP, One North Broadway, Suite 1005, White Plains, NY 10601, petitions this Court (1) for an Order declaring the Civil Investigative Demand for Answers to Interrogatories and Requests for Production of Documents (“CID”) issued by the Office of the Attorney General, State of Washington, Consumer Protection Division (“Attorney General”) on March 28, 2023 invalid and unenforceable, (2) for prospective injunctive relief against the Attorney General to enjoin his office from seeking information and documents from RSR Group relative to its purported investigation, and (3) to set aside the CID.

1 This Petition is based on RCW §§ 7.24, *et seq.*, RCW §§ 7.40, *et seq.*, RCW §§ 19.86.110(3)  
2 & (8), RCW § 19.86.170, RCW § 9.41.290, RCW § 9.41.370(2), Article I, Section 8 and the First  
3 and Fourth Amendments of the U.S. Constitution, Article 1, Sections 5 and 7 of the Washington  
4 State Constitution, and the records and files in this matter. RSR Group alleges as follows:

5 **A. PARTIES & VENUE**

6 1. RSR Group is a Delaware for-profit corporation with its principal place of business  
7 located at 4405 Metric Drive, Winter Park, Florida 32792. RSR Group is a federally licensed  
8 firearms dealer engaged in the business of the wholesale distribution of firearms and associated  
9 products to properly licensed firearms dealers located in various jurisdictions throughout the  
10 United States. Over its 40-plus year history RSR Group has revolutionized the shooting sports  
11 industry. It is a top distributor in the shooting sports market and has been recognized for its  
12 commitment to the industry and its programs. RSR Group takes pride in contributing to the  
13 National Shooting Sports Foundation, the National Rifle Association, the Second Amendment  
14 Foundation, the Congressional Sportsmen's Foundation, the U.S. Sportsmen's Alliance, Project  
15 ChildSafe, the Youth Shooting Sports Alliance, Honored American Veterans Afield, Fairways for  
16 Warriors, and the Fisher House Foundation. The company has also received numerous awards for  
17 its dedication to personal service and customer relations.

18 2. The Attorney General is a Washington state agency that has issued a CID to RSR  
19 Group.

20 3. Venue is appropriate in Thurston County pursuant to RCW § 19.86.110(8) and  
21 RCW § 4.12.025.

22 **B. CONTROVERSY**

23 4. A controversy arose after the Attorney General issued the CID to RSR Group  
24 pursuant to RCW § 19.86.110 based upon the Attorney General's purported investigation into sales  
25

1 of so-called “large capacity magazines” (“LCMs”). A copy of the CID, dated March 28, 2023, is  
2 attached to this Petition as **Exhibit “A.”**

3 5. The CID was issued and served on RSR Group’s registered agent in the state of  
4 Washington on or about March 28, 2023. RSR Group received the CID from its registered agent  
5 on or about April 12, 2023.

6 6. The CID contains five interrogatories and three requests for production with  
7 relevant time periods of “July 1, 2022 to Present” and “January 1, 2022 to Present.” The CID  
8 demands identification of and the production of documentation concerning RSR Group’s “sales,  
9 transfers, or other distributions of [LCMs] to any person or entity located in the State of  
10 Washington.” The documentation that is demanded includes “all invoices, sales records and  
11 receipts...shipping manifests or similar paperwork...FFL transfer documentation..., etc.” The  
12 CID also demands production of “all Communications with any firearm dealer, firearm store, or  
13 other retailer that sells firearms...located within the State of Washington” without any limitation  
14 on the nature, content, or substance of any such communications.

15 7. Upon review of the CID, RSR Group learned that the CID relates to the Attorney  
16 General’s investigation into sales of LCMs to individual consumers located within the State of  
17 Washington.

18 8. RSR Group does not sell firearms, LCMs, or any other products to individual  
19 consumers in the State of Washington, or elsewhere, and as such the Attorney General lacks  
20 authority to compel RSR Group to respond to the exceedingly broad and unduly burdensome  
21 demands asserted in the CID.

22 9. Although RSR Group initially requested an extension of time to review, respond  
23 and/or object to the CID and attempted to seek revisions to the broad, intrusive, and unduly  
24 burdensome demands asserted in the CID, on April 28, 2023 – *two days before the CID’s response*  
25 *and objection deadline* – the Attorney General notified RSR Group that it would grant a limited

1 two week extension of time to respond to the Interrogatories only on “condition” that RSR Group’s  
2 “answers are full and complete.” Additionally, on April 28, 2023 the Attorney General advised  
3 that no extension would be provided if RSR Group “intends to submit just objections to some/all  
4 of the [CID’s] requests.” A copy of the Attorney General’s e-mail, dated April 28, 2023, is attached  
5 to this Petition as **Exhibit “B.”**

6 10. The Attorney General’s unyielding insistence and escalation in asserting its  
7 demands on RSR Group is problematic, overly burdensome, intrusive and beyond the scope of the  
8 Attorney General’s authority to issue civil investigative demands.

9 11. Furthermore, RSR Group estimates that it would be forced to incur extraordinary  
10 costs and expenses totaling in excess of \$2.65 million to comply with the CID.

11 12. On May 1, 2023, RSR Group timely served its Objections and Answers to the CID  
12 on Assistant Attorney General Bob Hyde. A copy of RSR Group Objections and Answers to the  
13 CID, dated May 1, 2023, is attached to this Petition as **Exhibit “C.”**

14 13. The Attorney General’s actions surrounding the issuance of the CID and the scope  
15 of his purported investigation into in-state consumer sales of LCMs are forcing RSR Group to  
16 expend substantial financial resources, and are threatening to cause irreparable damage to RSR  
17 Group’s business and create reputational harm.

## 18 **C. LEGAL ISSUES**

19 14. The Attorney General lacks authority to issue the CID because it seeks information  
20 and documents pertaining to matters for which the Washington Consumer Protection Act (RCW  
21 §§ 19.86, *et seq.*) does not apply and/or is preempted by the comprehensive federal regulatory  
22 scheme applicable to licensed firearm manufacturers, importers, distributors, and dealers, and/or  
23 Washington’s Uniform Firearms Act, RCW §§ 9.41, *et seq.* The CID’s broad demands seek  
24 information and documents that include actions or transactions which comply with RCW §  
25

1 9.41.370(2) including, for example, the wholesale distribution of LCMs to federally licensed  
2 dealers in Washington for subsequent retail sale to persons outside the State of Washington.

3 15. The Attorney General has no authority to regulate RSR Group’s conduct outside  
4 the State of Washington, and the Attorney General has no colorable claim that any wholesale sales  
5 or transfers of so-called “Large Capacity Magazines” to licensed firearms dealers located in the  
6 State of Washington could somehow be an “unfair or deceptive act or practice” under the  
7 Washington Consumer Protection Act, RCW §§ 19.86, *et seq.* Furthermore, the constitutionality  
8 of Washington’s ban on in-state LCM sales (Senate Bill 5078; RCW §§ 9.41.370 & 9.41.375) has  
9 been called into question in several pending legal actions, including *Sullivan v. Ferguson*, No.  
10 3:22-cv-05403 (U.S. Dist. Ct. W.D. Wash.), and *Brumback v. Ferguson*, No. 1:22-cv-03093-MKD  
11 (U.S. Dist. Ct. E.D. Wash.).

12 16. The CID violates RCW § 19.86.110(2)(a) by failing to comply with its  
13 requirements for specificity as to the subject matter of the investigation as it specifically relates to  
14 RSR Group based on the fact that RSR Group does not sell products to individual consumers.

15 17. The CID violates RCW § 19.86.110(2)(b) by failing to comply with its  
16 requirements for specificity as to the documentary material demanded relative to the subject matter  
17 of the Attorney General’s purported investigation into in-state sales of LCMs to Washington  
18 consumers.

19 18. The CID violates RCW § 19.86.110 by failing to comply with the requirements set  
20 forth in RCW § 19.86.110(3)(a) because it imposes obligations upon RSR Group that exceed the  
21 scope of permissible discovery under the Washington Superior Court Civil Rules, the Washington  
22 Rules of Evidence, and other applicable rules.

23 19. The CID violates RSR Group’s Fourth Amendment rights to be free from  
24 unreasonable search and seizure because it is vastly overbroad, demands information and  
25 documents about lawful conduct and which are beyond the Attorney General’s authority, is not

1 reasonably related to any legitimate investigative purpose, and is overly burdensome and  
2 expensive.

3 20. The CID violates RSR Group's right to privacy under Article 1, Section 7 of the  
4 Washington State Constitution.

5 21. The CID violates RSR Group's First Amendment rights.

6 22. The CID violates RSR Group's right to free speech under Article 1, Section 5 of  
7 the Washington State Constitution.

8 23. By issuing the CID and pursuing the purported investigation, the Attorney General  
9 seeks to regulate and burden out-of-state commercial activity and lawful interstate commerce,  
10 which improperly encroaches on Congress's exclusive authority to regulate interstate commerce  
11 in violation of the Dormant Commerce Clause, Article I, Section 8 of the United States  
12 Constitution.

13 **D. RSR GROUP IS ENTITLED TO DECLARATORY RELIEF**

14 24. Pursuant to RCW §§ 7.24, *et seq.*, this Court has the authority to declare the rights,  
15 status and other relations of the parties in order to ensure that public officers and officials act within  
16 the bounds of their lawful powers. RSR Group seeks a declaration that the Attorney General lacks  
17 authority to issue the CID and that the CID is invalid and unenforceable.

18 25. The declaratory relief requested, if rendered or entered, will terminate the  
19 controversy and remove uncertainty as to the Attorney General's authority to issue the CID and/or  
20 the validity of the CID itself.

21 26. The public interest would be furthered by granting declaratory relief because  
22 constitutional rights are at stake, and because the public has an interest in preserving the principle  
23 of prosecutorial neutrality.

1 **E. RSR GROUP IS ENTITLED TO INJUNCTIVE RELIEF**

2 27. Pursuant to RCW §§ 7.40, *et seq.*, this Court has the authority to provide injunctive  
3 relief in order to ensure that public officers and officials act within the bounds of their lawful  
4 powers. RSR Group seeks an injunction as to prevent the Attorney General from enforcing the  
5 CID.

6 28. RSR Group has a substantial likelihood of success on the merits.

7 29. RSR Group will suffer irreparable injury if an injunction is not granted.

8 30. An injunction will not substantially injure other interested parties, in that there can  
9 be no injury to the Attorney General for not being able to prosecute or investigate RSR Group for  
10 lawful activity, nor is there any harm to the Attorney General arising from a brief delay to await a  
11 ruling on the merits of this matter.

12 31. The public interest would be furthered by the injunction because constitutional  
13 rights are at stake, and because the public has an interest in preserving the principle of prosecutorial  
14 neutrality.

15 **PRAYER FOR RELIEF**

16 WHEREFORE, RSR Group prays as follows:

- 17 1. The Court declare the March 28, 2023 CID invalid and unenforceable;
- 18 2. The Court enjoin the Attorney General from enforcing the March 28, 2023 CID;
- 19 3. The Court issue an injunction prohibiting the Attorney General from seeking  
20 information or documents from RSR Group relative to the Attorney General's  
21 purported investigation into sales of so-called "large capacity magazines";
- 22 4. The Court set aside the March 28, 2023 CID as being over broad, unduly  
23 burdensome and oppressive;
- 24 5. The Court award RSR Group its costs, including reasonable attorneys' fees; and
- 25

1 6. The Court grant such other relief as the Court deems equitable and proper under the  
2 circumstances.

3 DATED this 2nd day of May, 2023.

4 CORR CRONIN LLP

5 s/ Steven W. Fogg

6 Steven W. Fogg, WSBA No. 23528

7 s/ Jack M. Lovejoy

8 Jack M. Lovejoy, WSBA No. 36962

9 CORR CRONIN LLP

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15 Christopher Renzulli (*pro hac vice forthcoming*)

16 Peter V. Malfa (*pro hac vice forthcoming*)

17 RENZULLI LAW FIRM, LLP

18 One North Broadway, Suite 1005

19 White Plains, NY 10601

20 Ph: (914) 285-0700 | Fax: (914) 285-1213

21 Email: crenzulli@renzullilaw.com;

22 pmalfa@renzullilaw.com

23 *Attorneys for Petitioner RSR Group, Inc.*



# EXHIBIT

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**OFFICE OF THE ATTORNEY GENERAL  
STATE OF WASHINGTON**

IN THE MATTER OF:  
  
RETAIL SALES OF HIGH CAPACITY  
MAGAZINES IN WASHINGTON

CIVIL INVESTIGATIVE DEMAND FOR  
ANSWERS TO INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS

**THE STATE OF WASHINGTON TO: RSR GROUP  
c/o Incorporating Services, Ltd.  
3400 Capitol Blvd SE, Ste. 101  
Tumwater, WA 98501**

**DEMAND IS HEREBY MADE** upon you by the Consumer Protection Division, Office of the Attorney General, State of Washington (Attorney General), to answer in writing and under oath, the Interrogatories contained in this Civil Investigative Demand (CID). This Civil Investigative Demand is made pursuant to RCW 19.86.110. The Attorney General believes you have knowledge relevant to the subject matter of an investigation now in progress. Said investigation involves possible past or current violations of RCW 19.86.020 (unfair or deceptive acts or practices, or unfair methods of competition, in the conduct of any trade or commerce) and RCW 9.41.375 (sales of high capacity magazines); specifically unfair or deceptive acts and practices, and unfair methods of competition, with respect to distributing, selling, or offering for sale high capacity magazines to Washington consumers.

1 **I. TIME AND PLACE OF PRODUCTION**

2 The requested documents are to be produced to Bob Hyde, Assistant Attorney General,  
3 at the Office of the Attorney General, 800 Fifth Avenue, Suite 2000, Seattle, WA 98104, within  
4 thirty (30) days of being served with this Civil Investigative Demand, or at such other time and  
5 place as is agreed to by the parties.

6 **II. COMMUNICATIONS**

7 All notices, questions, or communications concerning this Civil Investigative Demand  
8 should be directed to Bob Hyde, Assistant Attorney General, 800 Fifth Avenue, Suite 2000,  
9 Seattle, WA 98104, (206) 233-3392, or by email at Bob.Hyde@atg.wa.gov.

10 **III. DEFINITIONS**

11 3.1 "Relating to" means constituting, containing, concerning, discussing, describing,  
12 analyzing, identifying, referring to, or stating.

13 3.2 "You" and "your" refer to RSR Group, and any parent, affiliate, sister, subsidiary,  
14 predecessor, successor or assignee of it, and its principals, operating divisions, present or former  
15 owners, employees, servants, officers, directors, agents, representatives, attorneys, accountants,  
16 independent contractors, distributors, and any other persons or entities acting on behalf of or  
17 under the direction, authorization, or control of RSR Group, including any foreign or overseas  
18 affiliates. This definition is intended to also include Your online store.

19 3.3 "Large Capacity Magazine" means an ammunition feeding device with the  
20 capacity to accept more than 10 rounds of ammunition, or any conversion kit, part, or  
21 combination of parts, from which such a device can be assembled if those parts are in possession  
22 of or under the control of the same person, but shall not be construed to include any of the  
23 following: (a) An ammunition feeding device that has been permanently altered so that it cannot  
24 accommodate more than 10 rounds of ammunition; (b) A 22 caliber tube ammunition feeding  
25 device; or (c) A tubular magazine that is contained in a lever-action firearm. RCW 9.41.010(16).

1           3.4     “Communication” means every disclosure, transfer, exchange, or transmission of  
2 information, whether oral, written, or electronic, by voice speech, telecommunications  
3 (including messaging services, such as text messages), virtual meeting (e.g., FaceTime, Zoom,  
4 or Webex), computer, electronic mail, facsimile, or otherwise.

5           3.5     “Document” or “documents” means all computer files and written, recorded, and  
6 graphic materials of every kind, including audio material, video material, and photographic  
7 material regardless of whether in digital, analog or in another form, in the possession, custody  
8 or control of the respondent. The terms “document” and “documents” includes material defined  
9 as “writings” and “recordings” in ER 1001(a). The terms “document” and “documents” also  
10 includes electronic correspondence and drafts of documents, copies of documents that are not  
11 identical duplicates of the originals, and copies of documents the originals of which are not in  
12 the possession, custody, or control of the respondent.

13           3.6     “Identify,” when used with respect to a document, means to state with respect to  
14 each such document:

- 15           a.     Title of the document;
- 16           b.     Author;
- 17           c.     Title or position of the addressee;
- 18           d.     Type of document;
- 19           e.     Date it was prepared;
- 20           f.     Number of pages it comprises; and
- 21           g.     Production number.

22           3.7     “Identify,” when used with respect to an entity, means to state with respect to  
23 each such entity:

- 24           a.     Full legal name or title;
- 25           b.     Form of business (i.e. corporation, partnership, limited liability co.);
- 26           c.     Relationship to You;

- d. Complete business location and mailing address;
- e. Telephone and facsimile numbers;
- f. State of incorporation or organization or, if organized outside the United States, country and city of incorporation or organization; and
- g. Address of headquarters and/or principal place of business.

3.8 “Identify,” when used with respect to a Person, means to state with respect to each such Person:

- a. Name;
- b. Title(s);
- b. Residential or business mailing address;
- c. Telephone number; and
- d. Email address.

3.9 “Person” and “entity” mean natural persons, proprietorships, firms, general partnerships, associations, joint ventures, for-profit corporations, non-profit corporations, trusts, groups, agencies, institutions, other business or government organization, or any other legal entity, and all present and former directors, officers, employees, agents, consultants, or other persons acting in concert with or on behalf of any of them.

3.10 The singular includes the plural and vice versa. The masculine includes the feminine and neuter genders. The past tense includes the present tense where the clear meaning is not distorted by change of tense. “And” as well as “or” shall be construed disjunctively or conjunctively as necessary to bring within the scope of the request all responses that otherwise might be construed to be outside its scope. “Include” and “including,” and variations thereof, shall not be interpreted as terms of limitation but shall be deemed to be followed by the words “without limitation.” “Any” shall be construed as synonymous with “every” and “all” and shall be all inclusive.”

1 **IV. INSTRUCTIONS**

2 4.1 Unless otherwise noted, the relevant time period for which documents and  
3 information are requested is **July 1, 2022**, to the present.

4 4.2 This CID requests production of all described documents in your possession,  
5 custody, or control without regard to the person or persons by whom or for whom the documents  
6 were prepared (e.g., your employees, distributors, representatives, competitors, or others).

7 4.3 This CID includes documents and information in the possession of your  
8 employees, agents, representatives, and attorneys, unless privileged. If you contend that the  
9 information requested by any request is privileged in whole or in part, or if you otherwise object  
10 to any part of any request or contend that any identified document would be excluded from  
11 production to the Attorney General in discovery regardless of its relevance, identify the  
12 document and state the basis for the privilege, and provide a detailed privilege log that contains  
13 at least the following information for each document or piece of information that you have  
14 withheld:

- 15 a. The name of each author, writer, sender, creator, or initiator of  
16 such document;
- 17 b. The name of each recipient, addressee, or party for whom such document  
18 was intended or to whom the document was sent;
- 19 c. The date of such document or an estimate thereof if no date appears on  
20 the document;
- 21 d. The general subject matter of the document; and
- 22 e. The claimed grounds for withholding the document, including, but not  
23 limited to, the nature of any claimed privilege and grounds in  
24 support thereof.

1           4.4     This CID imposes a continuing duty to produce promptly any responsive  
2 information or item that is not objected to, which comes into your knowledge, possession,  
3 custody, or control after your initial production of responses to this CID.

4           4.5     In each instance in which a document is produced, produce the current edition,  
5 along with all earlier editions or predecessor documents serving the same function, even though  
6 the title of earlier documents may differ from current versions.

7           4.6     The following procedures shall apply to the production of documents and  
8 information in response to this CID:

- 9           a.     The recipient of this CID shall label each responsive document (i.e.,  
10                 Response to Request No. 1, Response to Request No. 2, and so forth),  
11                 group all documents responsive to a particular request together, and place  
12                 a label on each group of documents which identifies the  
13                 corresponding request;
- 14           b.     All attachments to responsive documents or information shall be  
15                 produced with, and attached to, the responsive documents (or digitally in  
16                 corresponding order);
- 17           c.     Each responsive document or information shall be produced in its entirety  
18                 and no portion of any document or information shall be edited, cut,  
19                 masked, redacted or otherwise altered, unless for applicable privilege  
20                 which shall be logged according to the procedures set forth above;
- 21           d.     The recipient of this CID shall provide a key to all abbreviations used in  
22                 the documents or information and shall attach the key to the  
23                 corresponding documents or information.

24           4.7     Documents or information that may be responsive to more than one (1) numbered  
25 request in this CID need not be submitted more than once. However, for each such document or  
26 information, the recipient of this CID shall identify all of the numbered requests to which the

1 document or information is responsive. If any responsive document or information has been  
2 previously supplied to the Washington Attorney General's Office, you shall identify the  
3 document(s) or information previously provided and the date(s) of submission.

4 4.8 You shall consecutively number each page of all documents or information  
5 produced with your response, and indicate the total number of pages produced with your  
6 response. This page numbering must be separate from and must not alter any original page  
7 numbering on the responsive documents or information.

8 4.9 Your responses to the requests in this CID should include all relevant  
9 electronically stored information in your possession, custody, or control. Electronically stored  
10 information is an irreplaceable source of evidence and therefore you must implement appropriate  
11 safeguards against the destruction of evidence until the final resolution of this issue, as  
12 noted below.

13 4.10 Production of electronically stored information and other documents in electronic  
14 format shall conform to the standards set forth in **Exhibit A** (attached).

15 4.11 If you are unable to fully answer any particular interrogatory or request for  
16 documents, supply all of whatever information is actually available. Designate such response as  
17 incomplete, and accompany the information and documents produced with an explanation that  
18 includes the reasons for the incomplete answer, a description of any and all of your efforts to  
19 obtain the information, and the source from which the Attorney General may obtain information  
20 to complete your response. If books, records, or other sources that provide accurate answers are  
21 not available, provide your best estimates and describe how you derived the estimates, including  
22 the sources or bases of such estimates. Designate estimated data as such by marking it with the  
23 "est." notation. If there is no reasonable way for you to make an estimate, provide an explanation.

24 4.12 If particular documents responsive to this CID no longer exist for reasons other  
25 than the ordinary course of business but you have reason to believe they have been in existence,  
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1 describe the documents, state the circumstances under which such documents were lost or  
2 destroyed, and identify persons having knowledge of the content of the documents.

3 4.13 In order for your response to this demand to be complete, submit with your  
4 response the attached certification form, as executed by the official supervising your compliance  
5 with this CID.

6 4.14 **Duty to Preserve Documents: Do not destroy any documents, information,  
7 or other data relating to any of the requests in this CID.** All documents, information, and  
8 other data that relate to the subject matter or requests of this CID must be preserved. Any  
9 destruction involving such documents, information, and other data must cease immediately, even  
10 if it is your normal or routine course of business to delete or destroy such documents,  
11 information, or data and, even if you believe such documents, information, or data are privileged  
12 or otherwise need not be produced.

13 **V. INTERROGATORIES**

14 **INTERROGATORY NO. 1:** Identify all Persons involved in responding to this CID,  
15 including identification of each Request that each Person provided information for or answered.

16 **ANSWER:**  
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19 **INTERROGATORY NO. 2:** Describe Your corporate structure and ownership. Please  
20 include all relationships with any parent, affiliate, sister, subsidiary, predecessor, or successor  
21 assignee(s).

22 **ANSWER:**  
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1 **INTERROGATORY NO. 3:** Identify all Persons responsible for Your regulatory  
2 compliance.

3 **ANSWER:**  
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6 **INTERROGATORY NO. 4:** For the time period of July 1, 2022 to the present, identify  
7 each of Your sales, transfers, or other distributions of Large Capacity Magazines to any person  
8 or entity located in the State of Washington. When identifying each such sale, transfer, or  
9 distribution, include:

- 10 a. Customer name;
- 11 b. Shipping address;
- 12 c. Telephone number;
- 13 d. Email address;
- 14 e. Model number and name of Large Capacity Magazine(s);
- 15 f. Quantity of Large Capacity Magazine(s);
- 16 g. Date of sale, transfer, or distribution; and
- 17 h. Date You shipped Large Capacity Magazine(s) to Washington.

18 **ANSWER:**  
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21 **INTERROGATORY NO. 5:** For the time period of July 1, 2022 to the present, identify  
22 each Large Capacity Magazine that was returned to You by any person or entity located in the  
23 State of Washington. When identifying each such return, include:

- 24 a. Customer name;
- 25 b. Shipping address;
- 26 c. Telephone number;

- d. Email address;
- e. Model number and name of Large Capacity Magazine(s) returned;
- f. Quantity of Large Capacity Magazine(s) returned;
- g. Date of return; and
- h. Date Person shipped Large Capacity Magazine(s) to You.

**ANSWER:**

**VI. REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** Provide any and all documents referenced in, supporting, or that form the basis of your response to the Interrogatories above. This request is intended to include (but not be limited to) all invoices, sales records and receipts of any LCM sales or transfers, shipping manifests or similar paperwork regarding any sales or transfers of LCMs, FFL transfer documentation for any transfer of a firearm packaged with an LCM, etc. Please label those documents as responsive to the corresponding Interrogatory number listed above.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 2:** For the time period of January 1, 2022 to the present, provide all Communications with any Person relating in any way to the sale, transfer, or distribution of Large Capacity Magazines in the State of Washington.

**RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 3:** For the time period of January 1, 2022 to the  
2 present, provide all Communications with any firearm dealer, firearm store, or other retailer that  
3 sells firearms (i.e., Cabela's, etc.) located within the State of Washington. For purposes of this  
4 Request for Production, "Communications" does not include invoices, sales records, receipts,  
5 shipping manifests, or similar paperwork.

6 **RESPONSE:**

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10 **This Civil Investigative Demand is issued pursuant to the powers vested in the**  
11 **Attorney General of the State of Washington by RCW 19.86.110. The Attorney General is**  
12 **authorized to enforce this demand and failure to comply with this demand shall subject**  
13 **you to sanctions as provided in RCW 19.86.110.**

14 DATED this 28th day of March, 2023.

15  
16 ROBERT W. FERGUSON  
Attorney General

17  
18 /s/ Bob Hyde  
19 BOB HYDE, WSBA # 33593  
20 Assistants Attorney General  
21 Attorneys for State of Washington  
22 800 Fifth Avenue, Suite 2000  
23 Seattle, WA 98104  
24 (206) 233-3392  
25 Bob.Hyde@atg.wa.gov  
26

**CERTIFICATION**

I, \_\_\_\_\_, having made the foregoing responses to the interrogatories and requests for production of documents in this Civil Investigative Demand, certify under penalty of perjury under the laws of the State of \_\_\_\_\_, that I am authorized to sign legal documents on respondent's behalf and know the responses herein to be true, correct, and complete.

Signature: \_\_\_\_\_

Title or Position: \_\_\_\_\_

Date: \_\_\_\_\_

City and State: \_\_\_\_\_

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1 **PROOF OF SERVICE**

2 I certify that I caused true and correct copies of this document to be served via Certified  
3 Mail and email on the following party at the following address:

4 **RSR GROUP**  
5 **c/o Incorporating Services, Ltd.**  
6 **3400 Capitol Blvd SE, Ste. 101**  
7 **Tumwater, WA 98501**

8 I certify, under penalty of perjury under the laws of the State of Washington, that the  
9 foregoing is true and correct.

10 DATED this 28th day of March, 2023, at Seattle, Washington.

11  
12 /s/ Bob Hyde  
13 BOB HYDE, WSBA # 33593  
14 Assistant Attorney General  
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**Washington State Attorney General's Office  
Consumer Protection Division  
Everlaw Document Production Standards**

This document describes the technical requirements for electronic document productions to the Consumer Protection Division of the State of Washington Attorney General's Office (AGO). It is highly recommended that parties confer in advance of any large-scale document production.

Any proposed file formats other than those described below must be discussed with the legal and technical staff of the AGO Consumer Protection Division prior to submission.

**1. Definitions and Scope**

- a. **“Document(s)”** shall have the broadest meaning pursuant to Rule 34 of the Washington Superior Court Civil Rules (CR) and case law construing the same, and includes all electronic documents or electronically stored information (ESI) existing in any medium from which information can be obtained or translated into reasonably usable form.
- b. **“Native File(s)”** or **“Native Format”** means ESI that have an associated file structure defined by the creating or viewing application in the file type for (or of) the application in which such ESI is normally created, viewed, and/or modified in the regular course of the Producing Party's business.

At a minimum, all spreadsheets, presentation files (PowerPoint), and audio/video files must be produced in native format, unless there is an agreement to the contrary. (Note: An Adobe PDF file is **not** considered a Native File or Native Format unless the document was initially created as a PDF.)

- c. **“Metadata”** means: (i) information associated with or embedded in a Native File that does not constitute the primary content region of the file; and (ii) information generated automatically by the operation of a computer or other information technology system when a Native File is created, modified, transmitted, deleted, or otherwise manipulated by a user of such system.
- d. **“Load File”** means an electronic data file containing information about the Documents in a production, including an indication of which individual pages or files constitute each Document, and data relating to each individual Document, including extracted metadata.
- e. **“OCR”** means optical character recognition, i.e., using software to generate text from an image of text.
- f. **“Extracted Text”** means all text content extracted from a Native File.
- g. **“Receiving Party”** shall mean the party receiving production of Documents in response to any request for production of document(s).

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Everlaw Document Production Standards**

- h.** “**Producing Party**” shall mean the party producing Documents in response to any request for production of documents.
- i.** “**Bates Number**” means an identifier that consists of a short two to eight letter prefix, associated with the Producing Party’s name, followed by a six-digit number (e.g., ABCD000001). The prefix should include only letters, dashes, or underscores. The prefix and number should not be separated by a space. Each page in the production must be assigned a unique, incremental Bates number. The prefix must be the same for all pages produced from the same Producing Party.

**2. General Production Requirements**

- a.** Reference the specific portion of the request to which you are responding.
- b.** All submissions must be organized **by custodian**, unless otherwise instructed.
- c.** Electronic files must be produced in their **Native Format**, i.e., the format in which they are ordinarily used and maintained during the normal course of the Producing Party’s business. For example, an MS Excel file must be produced as an MS Excel file rather than a PDF or other image of a spreadsheet.
- d.** Emails and attachments to emails must be produced in their **Native Format**. If an email or an attachment requires either withholding or redaction, that file may be produced as an image file as long as the parent-child relationship is maintained and reflected in the Load File.
- e.** While the AGO accepts imaged productions **in addition** to native formats, imaged productions without native formats are deficient, unless the original document only exists in hard copy form or its Native Format is an image.
- f.** All Documents, whether originally stored in paper or electronic form, must be produced in the manner described herein. If the Producing Party has concerns or questions about these specifications and requirements, the Producing Party shall schedule a conference with the Requesting Party’s counsel, as soon as possible after receipt of the requests at issue, to discuss alternative production requirements, concerns, formats, or methods.

**3. Production Format**

Documents shall be produced according to the following specifications:

- a. Electronic Production of Paper Documents**  
Documents that are maintained in paper format shall be scanned images at 300 DPI resolution, in text searchable PDF format that, to the maximum practicable extent, represents the full and complete information contained in the original



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Document. Documents must be produced with the associated OCR text, and Load File. Paper Documents that contain affixed notes shall be scanned with the notes affixed, if it can be done so in a manner so as not to obstruct other content on the document. If the content of the Document is obscured by the affixed notes, the Document and note shall be scanned separately, with a parent-child relationship indicated in the Load File.

**b. Electronically Stored Information**

Document images should be generated from electronic Documents in a set of color 300 DPI text searchable PDFs, one PDF file per document, that reflects the full and complete information contained on the original document to the maximum practicable extent. Electronic Documents must be produced together with a Load File containing all required metadata as set out in Section 13, below. The Producing Party may withhold the redacted text for redacted Documents.

**c. File Structure**

The Producing Party shall produce the following sets of files for all produced documents:

**i. Load File**

- (1) Each production must include a .dat metadata Load File, in a delimited text file format. The first row of the Load File should contain the metadata column/field names. Each subsequent row should contain the metadata for a single document. Each column of each row should contain one metadata value, with values encapsulated by a pre-designated "quote" character and columns separated by a pre-designated "separator" character throughout.
- (2) The Load File should use a thorn (þ, ASCII character 231) as the pre-designated "quote" character, and the special, non-printing character DC4 (ASCII character 20) as the pre-designated column separator.
- (3) The fields Begin Bates, End Bates, and NativePath must be present.
- (4) Every row must have the same number of columns/fields (empty values are acceptable).
- (5) Text must be encoded in either ASCII, UTF-8, or UTF-16.
- (6) The Load File should be placed in the Data folder of the production in the root directory.

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**ii. Extracted Text and OCR Files (.txt files)**

- (1) A single text file for each Document, containing the text of all the document's pages.
- (2) Pages separated by form feed character (decimal 12, hex 0x0C).
- (3) Filenames should be of the form: <Bates num>.txt, where <Bates num> is the Bates number of the first page of the Document.
- (4) Text and filenames must be encoded in UTF-8.
- (5) Files should be placed in the *text*/subdirectory.

**iii. Image Files**

- (1) A single 300 DPI, color, text searchable PDF file per Document.
- (2) Filenames should be of the form: <Bates num>.pdf, where <Bates num> is the BATES number of the first page of the document.
- (3) Files should be placed in the *images*/subdirectory.
- (4) PDFs shall include searchable text embedded in the Document.
- (5) No other information should be provided in image filenames, including confidentiality status.
- (6) Filenames must be encoded in UTF-8.

**iv. Native Files**

- (1) Filenames must be unique in the production, unless the content is identical. We recommend naming files by the Bates number of the first page of the associated Document.
- (2) The filename must retain the file extension corresponding to the original native format; for example, an Excel 2003 spreadsheet's extension must be .xls.
- (3) Each filename, including extension, must correspond to the NativePath metadata field in its corresponding document's row in the Load File.

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(4) Filenames must be encoded in UTF-8.

(5) Files should be placed in the *natives/* subdirectory.

**4. Production Method**

Production media shall always be encrypted and sent via FTP or SFTP link provided via email at the time a production letter is emailed, unless the parties agree otherwise. If a production is too large to practicably FTP, it may be sent via encrypted physical media such as a Hard Drive or USB, along with a cover letter noting the name of the matter in which it was produced, the production date, the Bates number range of the material contained in the production, and a short description of its contents. Passwords for encrypted media should be sent separately from the media itself.

**5. Document Unitization**

Imaged Documents shall be unitized in a manner that maintains the Document(s) and any attachments as they existed in their original state.

**6. Attachment Families**

For electronic Documents, the relationship of documents in a document collection (e.g., cover letter and enclosures, e-mail and attachments, binder containing multiple documents, or other documents where a parent-child relationship exists between the documents) shall be maintained using the Begin Family and End Family fields of the Load File, provided however that the Producing Party must present only one level of parent-child relationship. Document Images generated from attachments to emails stored in Native Format shall be produced contemporaneously and sequentially immediately after the parent email in their Bates numbering.

**7. Duplicates**

A Producing Party who has more than one identical copy of an electronic document (i.e., the documents are actual and contextual duplicates) need only produce a single copy of that document. A Producing Party need not produce the same electronically stored information in more than one form. Deduplication should be based on the MD5 or SHA1 hash values of native version of documents, respecting differences in families (i.e., two duplicates attached to different emails will both be provided). The hash value will take into account the document's text and intrinsic metadata (e.g., author, date created, etc.), but not extrinsic metadata values (e.g., custodian, file path). Emails should be systematically and consistently de-duplicated.

**8. Bates Numbering**

Each Producing Party shall Bates number its production(s) as follows:

**a. Document Images**

Each page of a produced Document shall have a legible, unique page identifier ("Bates Number") electronically "burned" onto the image at a location that does

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not unreasonably obliterate, conceal, or interfere with any information from the source document. The Bates Numbers shall be formatted as described in Section 1.i., above. The Producing Party will use a consistent prefix throughout the matter. Thus, once a party chooses a prefix, *e.g.*, ABCD, it should not later produce a Document using a different prefix, *e.g.*, EFGH. No other legend or stamp should be placed on the Document Image other than a confidentiality legend (where applicable), redactions, and the Bates Number.

**b. Native Format Documents**

To preserve the integrity of Native Format Documents, no Bates Number, confidentiality legend or internal tracking number should be added to the content of the Native Document.

**c. Sort Order**

For Bates numbering, documents will be sorted by their original file path in ascending order, preserving family ordering.

**9. Confidentiality Designations**

Confidentiality designations must be made on an individual document basis – productions where all documents are designated “Confidential” are unacceptable. Documents designated as confidential pursuant to a protective order or other agreement should be clearly labeled as such to avoid inadvertent disclosure of confidential information. Provide the confidentiality designations in a field provided with the load file and emblazon the confidentiality designation on the imaged document with the Bates stamp. The confidentiality legend shall be placed onto each document’s image at a location that does not unreasonably obliterate or obscure any information from the source document.

**10. Search Terms**

The Producing Party must meet and confer with the Receiving Party before finalizing any search terms to identify electronic documents to be collected for review for possible production, or any subsequent modification of such search terms.

**11. Databases**

To the extent discovery requires production of discoverable electronic information contained in a large database, the Producing Party should meet and confer with the Receiving Party’s counsel to discuss the format of the production, with an understanding of which fields are relevant, and what set of queries is to be made for discoverable information. Prior to the conference, the Producing Party should produce relevant data dictionaries, white papers, and exemplar reports from the database in a reasonably usable and exportable electronic file (spreadsheet if possible).

**12. Privilege Logs**

The Producing Party must produce privilege logs in spreadsheet or .csv format. A Producing Party will produce a separate privilege log for each production within 20 days after the production of documents for which a privilege is asserted. The production of a

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privilege log for a custodian or his/her department must be made not less than 20 days prior to that custodian's deposition.

**13. Metadata**

The Producing Party shall produce the metadata information described below with each production and in the format described above. For each Document, the Producing Party shall produce a line in the corresponding Load File with the following fields, where available. The field naming conventions shall be as set forth in this Section. Datetime metadata will be provided in UTC in a consistent, reasonable, and clearly delimited format (e.g., M/d/y H:m). To the extent timezone information is provided for context, it will be provided in a separate Load File field.

<b>Field Name</b>	<b>Description</b>	<b>Data Type</b>	<b>Example</b>
Begin Bates	Beginning Bates number of first page of a document	Text	ABCD000001
End Bates	Ending Bates number of last page of a document	Text	ABCD000003
Begin Family	Begin Bates of parent document of family of attachments	Text	ABCD000001
End Family	End Bates of last attachment of family	Text	ABCD000004
Pages	Number of Bates stamped pages for the PDF image each document.	Number	3
NativePath	Relative file path of native record within production, including filename and extension of native file within the production. Only for documents produced in native format.	Text	.\VOL001\natives\001\ABCD000001.xlsx
TextPath	Relative file path of text record within production, including filename and extension of the text file within the production.	Text	.\VOL001\text\001\ABCD000001.txt
Placeholder	If Bates stamped document is produced with a placeholder image (values: Y or N)	Text	Y
Redacted	If this document has redactions (values: Y or N)	Text	Y

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ConfDesig or Endorsement	If this document has been designated confidential and emblazoned with a confidentiality stamp.	Text	Confidential
PrivDesig	If this document has been designated privileged.	Text	Privileged Documents
ResponseID	Identification of request to which document is responsive. If your document is responsive to more than one request list each item separated by semi-colons.	Text	RFP 2; RFP 3
All Custodians	For de-duplicated documents, list of all custodians the duplicate copy was collected from.	Text	
All Paths	For de-duplicated documents, list of all file paths for duplicate copies.	Text	
Author	Creator of document	Text	Jones
Bcc	Additional blind recipients of an email (Blind Carbon Copy)	Text	bob@acme.com
Cc	Additional recipients of email (Carbon Copy)	Text	sue@acme.com
Custodian	Name of person from whom documents were collected	Text	Jones
Date Created	Datetime document was created	Datetime	07/21/1969 02:56:00
Date Modified	Datetime document was last modified	Datetime	07/21/1969 02:56:00
Date Received	Datetime document was received	Datetime	07/21/1969 02:56:00
Date Sent	Datetime an email was sent	Datetime	07/21/1969 02:56:00
File Extension	The suffix at the end of the native filename indicating file type	Text	.docx .pdf .xlsx
Filename	Original filename of native document, including extension	Text	interesting_spreadsheet.xlsx

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File Path	Original source file path, including location, folder name, filename, and extension	Text	media.zip//jones.pst//sentmail/444.eml//interesting_spreadsheet.xlsx
From	Sender	Text	jones@acme.com
In Reply To	Message id of email this email is in reply to	Text	
Message Id	Unique message id from internet headers	Text	
MD5 Hash	MD5 Hash value of Document	MD5 Hash	
SHA1 Hash	SHA1 Hash value of document	SHA1 Hash	
Subject	Subject line	Text	Check this out!
To	Recipient	Text	mary@acme.com

**EXHIBIT**

**B**



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**From:** Hyde, Bob (ATG) <robert.hyde@atg.wa.gov>  
**Sent:** Friday, April 28, 2023 3:08 PM  
**To:** Arielle Tyree  
**Cc:** Nelson, John (ATG); Carr, Ben (ATG); Grant, Noah (ATG)  
**Subject:** RE: RSR Group -Civil Investigative Demand

Arielle,

Thank you for your email. When we spoke on April 6, you indicated that your client would be able to provide an essentially on-time response to the interrogatories and RFP no. 1. You asked for an extension of time for on RFPs 2 and 3, and I informed you that I could not authorize that unilaterally and that you would need to provide specific information to justify an extension. You indicated that you would promptly provide that to me, but that never happened. In fact, your email below does not provide any specific information and simply seeks a blanket extension for the entire CID response.

While the State will agree to reasonable extensions, it only does so when a target has articulated proper justification. Further, most extensions are not blanket—that is, extensions are granted for particular ROGs or RFPs. Nevertheless, in the spirit of cooperation, I can offer you an extension to May 15 on the interrogatories on the condition that your client’s answers are full and complete. I can offer an extension to June 1 on the RFPs on the same condition. However, if your client intends to submit just objections to some/all of the requests, the deadline for doing so remains May 1.

Thank you,

**Bob Hyde**

Assistant Attorney General  
Consumer Protection Division  
Washington State Attorney General’s Office  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
Office: (206) 233-3392  
[bob.hyde@atg.wa.gov](mailto:bob.hyde@atg.wa.gov)

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**From:** Arielle Tyree <atyree@rsrgroup.com>  
**Sent:** Friday, April 28, 2023 7:52 AM  
**To:** Hyde, Bob (ATG) <robert.hyde@atg.wa.gov>  
**Subject:** RSR Group -Civil Investigative Demand

[EXTERNAL]

Good morning Bob,

Thank you for taking my call a few weeks ago to discuss the Civil Investigative Demand for Answers to Interrogatories and Requests for Production of Documents (CID) received by RSR Group on March 31, 2023.

I have reviewed the CID and RSR has begun compiling the information to respond to the interrogatories. However, as I mentioned in our call, the request is incredibly broad and encompasses an expansive amount of information and documentation.


As a result, I am requesting a 30-day extension so that I may provide a more comprehensive response to the request. I would appreciate a response at your earliest convenience.

Thank you,


**Arielle Tyree**  
General Counsel  
RSR Group, Inc.



---

 (407) 554-6641

 [atyree@rsrgroup.com](mailto:atyree@rsrgroup.com)

 (407) 677-5804

CONFIDENTIALITY NOTICE: The information contained in this electronic communication, including any attachments, is confidential information, is intended only for the use of the recipients named above, and may be legally privileged. If the reader of this message is not an intended recipient, you are hereby notified that any review, use, dissemination, distribution or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please notify us immediately of the error by return e-mail and please permanently remove the original message and any copy of it from your system.

# EXHIBIT C

**OFFICE OF THE ATTORNEY GENERAL  
STATE OF WASHINGTON**

IN RE THE MATTER OF:

RETAIL SALES OF HIGH CAPACITY  
MAGAZINES IN WASHINGTON

RSR GROUP, INC.'S OBJECTIONS  
AND ANSWERS TO CIVIL  
INVESTIGATIVE DEMAND FOR  
ANSWERS TO INTERROGATORIES  
AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS

**RSR GROUP, INC. TO:** Bob Hyde  
Assistant Attorney General  
Office of the Attorney General  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104

Respondent RSR Group, Inc. ("RSR Group"), by and through its attorneys, Renzulli Law Firm, LLP, One North Broadway, Suite 1005, White Plains, NY 10601, and Corr Cronin LLP, 1015 Second Avenue, Floor 10, Seattle, WA 98104, hereby objects to and answers the Consumer Protection Division's, Office of the Attorney General, State of Washington ("Attorney General") Interrogatories and Requests for Production of Documents contained in the Civil Investigative Demand ("CID"), dated March 28, 2023, as follows:

**GENERAL RESPONSES AND OBJECTIONS**

The following General Responses and Objections are hereby incorporated into each of the specific Answers and Responses below as though they are fully set forth in full:

1. RSR Group objects to the CID in its entirety on the ground that it seeks information and documents pertaining to matters for which the Washington Consumer Protection Act (RCW §§ 19.86, *et seq.*) does not apply and/or is preempted by the comprehensive federal regulatory scheme applicable to licensed firearm manufacturers, importers, distributors and dealers, and/or Washington's Uniform Firearms Act, RCW §§ 9.41, *et seq.*

2. RSR Group objects to the CID in its entirety on the ground that it seeks information and documents pertaining to products that it has never sold to individual consumers in the State of Washington.

3. RSR Group objects to the CID in its entirety on the ground that the Washington Attorney General has no authority to regulate RSR Group's conduct outside the State of Washington, and the Attorney General has no colorable claim that any wholesale sales or transfers of so-called "Large Capacity Magazines" to licensed firearms dealers in Washington could somehow be an "unfair or deceptive act or practice" under the Washington Consumer Protection Act, RCW §§ 19.86, *et seq.*

4. RSR Group objects to the CID in its entirety on the grounds that it seeks information and documents out of proportion to the ends sought and of such a sweeping nature and so unrelated to the matter properly under inquiry as to exceed the Washington Attorney General's investigatory power. The CID's broad Requests for Production of Documents demand production of unreasonably extensive electronically stored information (ESI) regardless of whether such ESI involves conduct occurring within or outside of the State of Washington, and regardless of whether an action or transaction complies with RCW § 9.41.370(2) including, for example, the wholesale distribution of so-called "large capacity magazines" to a federally licensed dealers in Washington for subsequent retail sale to persons outside the state of Washington.

5. RSR Group objects to the CID and to each Definition, Instruction, Interrogatory and Document Request contained therein to the extent that they seek information or documents regarding business activities that took place outside of the State of Washington and that are beyond the jurisdiction of the Washington Attorney General.

6. RSR Group objects to the CID and to each Definition, Instruction, Interrogatory and Document Request contained therein to the extent that they seek information or documents regarding actions or transactions permitted by federal law and RCW § 9.41.370(2) and which are beyond the jurisdiction of the Washington Attorney General.

7. RSR Group objects to the CID and to each Definition, Instruction, Interrogatory and Document Request contained therein as they seek to impose obligations upon RSR Group that exceed the scope of permissible discovery under the Washington Superior Court Civil Rules, the Washington Rules of Evidence, RCW § 19.86.110(3), and other applicable rules.

8. The responses and objections herein are neither intended as, nor shall in any way be deemed, an admission or representation that certain documents exist or do not exist.

9. RSR Group objects to the CID and to each Definition, Instruction, Interrogatory and Document Request contained therein insofar as they purport to require RSR Group to create or generate documents that do not currently exist.

10. RSR Group objects to the CID and to each Definition, Instruction, Interrogatory and Document Request contained therein to the extent that they purport to call for the production of documents protected by the attorney-client privilege, the work-product doctrine, the right to free speech under Article 1, Section 5 of the Washington Constitution, the right to privacy under Article 1, Section 7 of the Washington Constitution or any other right to privacy or any other applicable privilege, doctrine, law, or rule protecting information from disclosure. Nothing contained herein is intended to be, nor shall in way be construed as, a waiver of any applicable privilege, doctrine, law or rule protecting information from disclosure.

11. RSR Group objects to the CID and to each Definition, Instruction, Interrogatory and Document Request contained therein to the extent that they purport to call for information or

documents a) already in the Washington Attorney General's possession, custody, or control, b) publicly available or otherwise equally available to the Washington Attorney General and RSR Group, or c) more appropriately obtained from other sources.

12. RSR Group objects to the Washington Attorney General's "Everlaw Document Production Standards" set forth in Exhibit A to the CID as the technical requirements are vague and ambiguous, overbroad, unduly burdensome and expensive.

### **INTERROGATORIES**

**INTERROGATORY NO. 1:** Identify all Persons involved in responding to this CID, including identification of each Request that each Person provided information for or answered.

**ANSWER:** RSR Group incorporates its General Responses and Objections by reference. Subject to and without waiving or otherwise limiting the foregoing objections, RSR Group states as follows: Arielle Tyree, General Counsel, RSR Group, Inc., with the assistance of RSR Group's executive management team, compliance department, legal counsel, and various personnel responsible for information technology management, sales management, sales, strategic accounts, customer service, records department, and accounting; c/o Christopher Renzulli, Esq., Renzulli Law Firm, LLP, One North Broadway, Suite 1005, White Plains, NY 10601; (914) 285-0700; crenzulli@renzullilaw.com.

**INTERROGATORY NO. 2:** Describe Your corporate structure and ownership. Please include all relationships with any parent, affiliate, sister, subsidiary, predecessor, or successor assignee(s).

**ANSWER:** RSR Group incorporates its General Responses and Objections by reference and objects to this Interrogatory to the extent that it would necessitate the creation of a compilation, abstract, audit or summary of commercially sensitive documents. RSR Group objects to this

Interrogatory on the grounds that it is vague and ambiguous and overbroad and unduly burdensome. In particular, the term “affiliate” is unclear and subject to numerous definitions and interpretations. RSR Group also objects to this Interrogatory on the grounds that it seeks information regarding business activities that took place and concern matters entirely outside of the State of Washington and which are beyond the jurisdiction of the Washington Attorney General. RSR Group further objects to this Interrogatory on the grounds that it seeks information which has no relevancy to the Washington Attorney General’s purported investigation into retail sales of magazines involving consumers who are located wholly within the State of Washington. Subject to and without waiving or otherwise limiting the foregoing objections, RSR Group states that it is a Delaware for-profit corporation that is 100% ESOP employee-owned.

**INTERROGATORY NO. 3:** Identify all Persons responsible for Your regulatory compliance.

**ANSWER:** RSR Group incorporates its General Responses and Objections by reference and objects to this Interrogatory to the extent that it would necessitate the creation of a compilation, abstract, audit or summary of commercially sensitive documents. RSR Group objects to this Interrogatory on the grounds that it is vague and ambiguous and overbroad and unduly burdensome. RSR Group also objects to this Interrogatory on the grounds that it seeks information regarding business activities that took place and concern matters entirely outside of the State of Washington and which are beyond the jurisdiction of the Washington Attorney General. RSR Group further objects to this Interrogatory on the grounds that it seeks information which has no relevancy to the Washington Attorney General’s purported investigation into retail sales of magazines involving consumers who are located wholly within the State of Washington. Subject to and without waiving or otherwise limiting the foregoing objections, RSR Group states as



follows: all RSR Group personnel are responsible for ensuring compliance with federal, state, and local laws and ordinances which are applicable to the distribution, sale and/or transfer of firearms and firearm-related products with the assistance of and guidance provided by RSR Group's Executive Management Team, General Counsel, Compliance Department, and legal counsel. To the extent that this Interrogatory purports to require RSR Group to provide a list identifying all of its personnel, RSR Group objects for the reasons stated above.

**INTERROGATORY NO. 4:** For the time period of July 1, 2022 to the present, identify each of Your sales, transfers, or other distributions of Large Capacity Magazines to any person or entity located in the State of Washington. When identifying each such sale, transfer, or distribution, include: a. Customer name; b. Shipping address; c. Telephone number; d. Email address; e. Model number and name of Large Capacity Magazine(s); f. Quantity of Large Capacity Magazine(s); g. Date of sale, transfer, or distribution; and h. Date You shipped Large Capacity Magazine(s) to Washington.

**ANSWER:** RSR Group incorporates its General Responses and Objections by reference and objects to this Interrogatory to the extent that it would necessitate the creation of a compilation, abstract, audit or summary of commercially sensitive documents. RSR Group objects to this Interrogatory on the grounds that it is vague and ambiguous, overbroad, unduly burdensome and expensive in relation to the needs of the Washington Attorney General's purported investigation, RSR Group's limited resources, and the fact that the information requested is not narrowly tailored. Furthermore, RSR Group objects to this Interrogatory on the ground that it seeks information concerning actions or transactions which are expressly permitted by RCW §§ 9.41.370(2)(a)-(c). RSR Group also objects to this Interrogatory on the grounds that it seeks information regarding business activities which are beyond the jurisdiction of the Washington Attorney General and

implicate confidential, trade secret, and commercially sensitive business information, the disclosure of which would cause economic and/or competitive harm to RSR Group. RSR Group further objects to this Interrogatory on the grounds that it seeks information which has no relevancy to the Washington Attorney General's purported investigation into retail sales of magazines involving consumers who are located wholly within the State of Washington.

**INTERROGATORY NO. 5:** For the time period of July 1, 2022 to the present, identify each Large Capacity Magazine that was returned to You by any person or entity located in the State of Washington. When identifying each such return; include: a. Customer name; b. Shipping address; c. Telephone number; d. Email address; e. Model number and name of Large Capacity Magazine(s) returned; f. Quantity of Large Capacity Magazine(s) returned; g. Date of return; and h. Date Person shipped Large Capacity Magazine(s) to You.

**ANSWER:** RSR Group incorporates its General Responses and Objections by reference and objects to this Interrogatory to the extent that it would necessitate the creation of a compilation, abstract, audit or summary of commercially sensitive documents. RSR Group objects to this Interrogatory on the grounds that it is vague and ambiguous, overbroad, unduly burdensome and expensive in relation to the needs of the Washington Attorney General's purported investigation, RSR Group's limited resources, and the fact that the information requested is not narrowly tailored. Furthermore, RSR Group objects to this Interrogatory on the ground that it seeks information concerning actions or transactions which are expressly permitted by RCW §§ 9.41.370(2)(a)-(c). RSR Group also objects to this Interrogatory on the grounds that it seeks information regarding business activities which are beyond the jurisdiction of the Washington Attorney General and implicate confidential, trade secret, and commercially sensitive business information, the disclosure of which would cause economic and/or competitive harm to RSR Group. RSR Group

further objects to this Interrogatory on the grounds that it seeks information which has no relevancy to the Washington Attorney General's purported investigation into retail sales of magazines involving consumers who are located wholly within the State of Washington.

### **REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** Provide any and all documents referenced in, supporting, or that form the basis of your response to the Interrogatories above. This request is intended to include (but not be limited to) all invoices, sales records and receipts of any LCM sales or transfers, shipping manifests or similar paperwork regarding any sales or transfers of LCMs, FFL transfer documentation for any transfer of a firearm packaged with an LCM, etc. Please label those documents as responsive to the corresponding Interrogatory number listed above.

**RESPONSE:** RSR Group incorporates its General Responses and Objections by reference and objects to this Request on the grounds that it is vague and ambiguous, overbroad, unduly burdensome and expensive in relation to the needs of the Washington Attorney General's purported investigation, RSR Group's limited resources, and the fact that the documentation requested is not narrowly tailored. Furthermore, RSR Group objects to this Request on the ground that it seeks documentation concerning actions or transactions which are expressly permitted by RCW §§ 9.41.370(2)(a)-(c). RSR Group also objects to this Request on the grounds that it seeks documentation regarding business activities which are beyond the jurisdiction of the Washington Attorney General and implicate confidential, trade secret, and commercially sensitive business information, the disclosure of which would cause economic and/or competitive harm to RSR Group. RSR Group further objects to this Request on the grounds that it seeks documentation which has no relevancy to the Washington Attorney General's purported investigation into retail sales of magazines involving consumers who are located wholly within the State of Washington.

Additionally, RSR Group objects to this Request to the extent that it seeks production of “any and all” documents under circumstances in which the production of a subset of documents would be sufficient to show the pertinent information on the ground that such a provision is overbroad and unduly burdensome.

**REQUEST FOR PRODUCTION NO. 2:** For the time period of January 1, 2022 to the present, provide all Communications with any Person relating in any way to the sale, transfer, or distribution of Large Capacity Magazines in the State of Washington.

**RESPONSE:** RSR Group incorporates its General Responses and Objections by reference and objects to this Request on the grounds that it is vague and ambiguous, overbroad, unduly burdensome and expensive in relation to the needs of the Washington Attorney General’s purported investigation, RSR Group’s limited resources, and the fact that the documentation requested is not narrowly tailored and includes communications dated prior to Senate Bill 5078’s effective date. Furthermore, RSR Group objects to this Request on the ground that it seeks documentation concerning actions or transactions which are expressly permitted by RCW §§ 9.41.370(2)(a)-(c). RSR Group also objects to this Request on the grounds that it seeks documentation regarding business activities which are beyond the jurisdiction of the Washington Attorney General and implicate confidential, trade secret, and commercially sensitive business information, the disclosure of which would cause economic and/or competitive harm to RSR Group. RSR Group further objects to this Request on the grounds that it seeks documentation which has no relevancy to the Washington Attorney General’s purported investigation into retail sales of magazines involving consumers who are located wholly within the State of Washington. Additionally, RSR Group objects to this Request to the extent that it seeks production of “all Correspondence” under circumstances in which the production of a subset of documents would be

sufficient to show the pertinent information on the ground that such a provision is overbroad and unduly burdensome. Subject to and without waiving or otherwise limiting the foregoing objections, RSR Group states that this overly broad Request implicates a substantial and overly burdensome volume of irrelevant electronically stored information (ESI) which could cost RSR Group more than \$2,675,000 to collect, process, and review for potential responsiveness.

**REQUEST FOR PRODUCTION NO. 3:** For the time period of January 1, 2022 to the present, provide all Communications with any firearm dealer, firearm store, or other retailer that sells firearms (i.e., Cabela's, etc.) located within the State of Washington. For purposes of this Request for Production, "Communications" does not include invoices, sales records, receipts, shipping manifests, or similar paperwork.

**RESPONSE:** RSR Group incorporates its General Responses and Objections by reference and objects to this Request on the grounds that it is vague and ambiguous, overbroad, unduly burdensome and expensive in relation to the needs of the Washington Attorney General's purported investigation, RSR Group's limited resources, and the fact that the documentation requested is not narrowly tailored and includes communications dated prior to Senate Bill 5078's effective date. Furthermore, RSR Group objects to this Request on the ground that it seeks documentation concerning actions or transactions which are expressly permitted by RCW §§ 9.41.370(2)(a)-(c). RSR Group also objects to this Request on the grounds that it seeks documentation regarding business activities which are beyond the jurisdiction of the Washington Attorney General and implicate confidential, trade secret, and commercially sensitive business information, the disclosure of which would cause economic and/or competitive harm to RSR Group. RSR Group further objects to this Request on the grounds that it seeks documentation which has no relevancy to the Washington Attorney General's purported investigation into retail

sales of magazines involving consumers who are located wholly within the State of Washington. Additionally, RSR Group objects to this Request to the extent that it seeks production of “all Correspondence” under circumstances in which the production of a subset of documents would be sufficient to show the pertinent information on the ground that such a provision is overbroad and unduly burdensome. Subject to and without waiving or otherwise limiting the foregoing objections, RSR Group states that this overly broad Request implicates a substantial and overly burdensome volume of irrelevant electronically stored information (ESI) which could cost RSR Group more than \$2,675,000 to collect, process, and review for potential responsiveness.

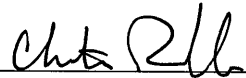
\* \* \*

The foregoing objections and answers reflect only the current state of RSR Group’s knowledge, understanding and belief with respect to the matters addressed in the CID. The foregoing objections and answers are neither intended as, nor shall in any way be deemed, an admission or representation that certain information or documents exist or do not exist. Without obligating itself to do so, RSR Group reserves the right to modify, supplement, amend, or revise its objections and answers with pertinent information as it may subsequently discover.

DATED: May 1, 2023

Yours, etc.,

**RENZULLI LAW FIRM, LLP**



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-and-

**CORR CRONIN LLP**

Steven W. Fogg, WSBA No. 23528  
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Seattle, WA 98104-1001  
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Fax: (206) 625-0900  
E-Mail: [sfogg@corrchronin.com](mailto:sfogg@corrchronin.com)

*Attorneys for Respondent RSR Group, Inc.*

**CERTIFICATION**

I, Arielle Tyree, having made the foregoing responses to the interrogatories in this Civil Investigative Demand, certify under penalty of perjury under the laws of the State of Florida, that I am authorized to sign legal documents on respondent's behalf and know the responses herein to be true, correct, and complete.

Signature:

Arielle Tyree

Title or Position:

General Counsel

Date:

May 1, 2023

City and State:

Winter Park, Florida




**PROOF OF SERVICE**

I certify that I caused true and correct copies of this document to be served via e-mail and Certified Mail, Return Receipt Requested, on the following party at the following address:

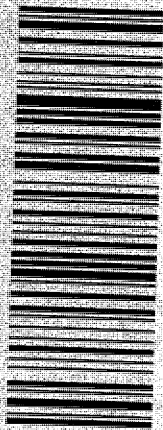
Bob Hyde  
Assistant Attorney General  
Office of the Attorney General  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
[robert.hyde@atg.wa.gov](mailto:robert.hyde@atg.wa.gov)

I certify, under penalty of perjury under the laws of the State of New York, that the foregoing is true and correct.

DATED this 1st day of May, 2023, at White Plains, New York.

  
\_\_\_\_\_  
Christopher Renzulli, Esq.  
*Attorney for Respondent, RSR Group, Inc.*

**CERTIFIED MAIL™**



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**RENZULLI LAW FIRM LLP**  
ONE NORTH BROADWAY  
SUITE 1005  
WHITE PLAINS, NY 10601

**TO:**

Bob Hyde  
Assistant Attorney General  
Office of the Attorney General  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104

**COMPLETE THIS SECTION**

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nd address on the reverse  
urn the card to you.  
the back of the mailpiece,  
pace permits.

Bob Hyde  
Attorney General  
Office of the Attorney General

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature	<input checked="" type="checkbox"/> Agent
B. Received by (Printed Name)	<input type="checkbox"/> Addressee
C. Date of Delivery	
D. Is delivery address different from item 1? If YES, enter delivery address below.	<input type="checkbox"/> Yes <input type="checkbox"/> No