

**SUMMONS - CIVIL**

JD-CV-1 Rev. 2-22  
C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a, 52-48, 52-259;  
P.B. §§ 3-1 through 3-21, 8-1, 10-13

For information on  
ADA accommodations,  
contact a court clerk or  
go to: [www.jud.ct.gov/ADA](http://www.jud.ct.gov/ADA).

STATE OF CONNECTICUT  
**SUPERIOR COURT**  
[www.jud.ct.gov](http://www.jud.ct.gov)



**Instructions are on page 2.**

- Select if amount, legal interest, or property in demand, not including interest and costs, is LESS than \$2,500.
- Select if amount, legal interest, or property in demand, not including interest and costs, is \$2,500 or MORE.
- Select if claiming other relief in addition to, or in place of, money or damages.

**TO: Any proper officer**

By authority of the State of Connecticut, you are hereby commanded to make due and legal service of this summons and attached complaint.

Address of court clerk (Number, street, town and zip code) <b>123 Hoyt Street, Stamford, CT 06905</b>		Telephone number of clerk <b>( 203 ) 965 – 5308</b>	Return Date (Must be a Tuesday) <b>April 18, 2023</b>
<input checked="" type="checkbox"/> Judicial District <input type="checkbox"/> Housing Session	G.A. Number: _____ <b>Stamford</b>	At (City/Town) <b>Stamford</b>	Case type code (See list on page 2) Major: <b>T</b> Minor: <b>90</b>

**For the plaintiff(s) enter the appearance of:**

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code) <b>Connecticut Trial Firm, LLC, 437 Naubuc Ave, Suite 107, Glastonbury, CT 06033</b>	Juris number (if attorney or law firm) <b>436558</b>
Telephone number <b>( 860 ) 471 – 8333</b>	Signature of plaintiff (if self-represented)

The attorney or law firm appearing for the plaintiff, or the plaintiff if self-represented, agrees to accept papers (service) electronically in this case under Section 10-13 of the Connecticut Practice Book.  Yes  No

E-mail address for delivery of papers under Section 10-13 of the Connecticut Practice Book (if agreed)  
**service@cttrialfirm.com**

Parties	Name (Last, First, Middle Initial) and address of each party (Number; street; P.O. Box; town; state; zip; country, if not USA)	
<b>First plaintiff</b>	Name: <b>Nathaniel Getz, Executor of the Estate of Suzanne Fountain - Philadelphia, PA</b> Address: <b>A/F/S Connecticut Trial Firm, LLC, 437 Naubuc Ave, Suite 107, Glastonbury, CT 06033</b>	<b>P-01</b>
<b>Additional plaintiff</b>	Name: Address:	<b>P-02</b>
<b>First defendant</b>	Name: <b>Sturm, Ruger &amp; Company, Inc. - Attn: Secretary, 1 Lacey Place, Southport, CT 06890</b> Address: <b>A/F/S CT Corporation System, 67 Burnside Ave, East Hartford, CT 06108-3408</b>	<b>D-01</b>
<b>Additional defendant</b>	Name: Address:	<b>D-02</b>
<b>Additional defendant</b>	Name: Address:	<b>D-03</b>
<b>Additional defendant</b>	Name: Address:	<b>D-04</b>
<b>Total number of plaintiffs: 1</b>		<b>Total number of defendants: 1</b>
<input type="checkbox"/> Form JD-CV-2 attached for additional parties		

**Notice to each defendant**

1. **You are being sued.** This is a summons in a lawsuit. The complaint attached states the claims the plaintiff is making against you.
2. To receive further notices, you or your attorney must file an *Appearance* (form JD-CL-12) with the clerk at the address above. Generally, it must be filed on or before the second day after the Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to appear.
3. If you or your attorney do not file an *Appearance* on time, a default judgment may be entered against you. You can get an *Appearance* form at the court address above, or on-line at <https://jud.ct.gov/webforms/>.
4. If you believe that you have insurance that may cover the claim being made against you in this lawsuit, you should immediately contact your insurance representative. Other actions you may take are described in the Connecticut Practice Book, which may be found in a superior court law library or on-line at <https://www.jud.ct.gov/pb.htm>.
5. If you have questions about the summons and complaint, you should talk to an attorney.

**The court staff is not allowed to give advice on legal matters.**

Date <b>03/10/2023</b>	Signed (Sign and select proper box) 	<input checked="" type="checkbox"/> Commissioner of Superior Court <input type="checkbox"/> _____ Clerk	Name of person signing <b>Andrew P. Garza</b>
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If this summons is signed by a Clerk: a. The signing has been done so that the plaintiff(s) will not be denied access to the courts. b. It is the responsibility of the plaintiff(s) to ensure that service is made in the manner provided by law. c. The court staff is not permitted to give any legal advice in connection with any lawsuit. d. The Clerk signing this summons at the request of the plaintiff(s) is not responsible in any way for any errors or omissions in the summons, any allegations contained in the complaint, or the service of the summons or complaint.	<i>For Court Use Only</i>
	File Date

I certify I have read and understand the above:	Signed (Self-represented plaintiff)	Date	Docket Number
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RETURN DATE: APRIL 18, 2023 : SUPERIOR COURT  
ESTATE OF SUZANNE FOUNTAIN : J.D. OF STAMFORD  
V. : AT STAMFORD  
STURM, RUGER & COMPANY, INC. : MARCH 10, 2023

**COMPLAINT**

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

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

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

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



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



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

regulatory purposes.

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

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

41. On March 22, 2021, Suzanne Fountain suffered the following injuries and losses:

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

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

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

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

WHEREFORE, the plaintiff claims:

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

THE PLAINTIFF,



Andrew P. Garza, Esq.  
Andrew B. Ranks, Esq.  
Ryan C. McKeen, Esq.  
Connecticut Trial Firm, LLC  
437 Naubuc Avenue, Suite 107  
Glastonbury, CT 06033  
Tel: (860) 471-8333  
Fax: (860) 471-8332  
Juris No. 436558

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**STATEMENT OF AMOUNT IN DEMAND**

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

THE PLAINTIFF,



Andrew P. Garza, Esq.  
Andrew B. Ranks, Esq.  
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