

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

Erika Reyes, Individually, and on behalf of her minor children; Esmeralda Ortiz, Individually, and on behalf of her minor child; and Kathleen Martinez, Individually, and on behalf of her minor children.

Plaintiffs,

v.

Dominic Miller; Lyndell Mays; Terry Young; John Doe 1; John Doe 2; John Doe 3; Fedo Antonia Manning; Ronnel Dewayne Williams, Jr.; Chaelyn Hendrick Groves; Union Station Kansas City, Inc.; City of Kansas City; The Greater Kansas City Sports Commission; O'Neill Events & Marketing; Flyover Event Co. LLC; Frontier Justice LS, LLC; The Ammo Box LLC; and R.K. Shows Mo. Inc.

Defendants.

Case No.

Division No. \_\_

JURY TRIAL DEMANDED

**PETITION**

COME NOW Plaintiffs Erika Reyes, individually, and on behalf of her minor children, Esmeralda Ortiz, individually, and on behalf of her minor child, and Kathleen Martinez, individually, and on behalf of her minor children (“Plaintiffs”), through counsel, and for their Petition against Defendants Dominic Miller; Lyndell Mays; Terry Young; John Doe 1; John Doe 2; John Doe 3; Fedo Antonia Manning; Ronnel Dewayne Williams, Jr.; Chaelyn Hendrick Groves; Union Station Kansas City, Inc.; City of Kansas City; The Greater Kansas City Sports Commission; O'Neill Events & Marketing; Flyover Event Co. LLC; Frontier Justice LS, LLC; The Ammo Box LLC; and R.K. Shows Mo. Inc (“Defendants”) allege as follows based upon personal knowledge as to their own actions and upon information and belief as to all other matters:

## INTRODUCTION

1. On February 14, 2024, nearly one million people poured onto the streets of Grand Boulevard and into the area surrounding Union Station and the National WWI Museum and Memorial to celebrate a Kansas City Chiefs Super Bowl title. However, at 1:49 p.m. the joyous occasion was shattered by the deafening cracks of gunfire—a cause for celebration transformed into a scene of horror and tragedy. Amid the crowd, 12 people pulled guns, and at least 6 people fired an estimated 40 shots. In a matter of seconds, 22 people were shot—one fatally. The devastating event that claimed the life of the late Lisa Lopez-Galvan and scarred 22 others physically and emotionally, including families like Plaintiffs Erika Reyes and her two minor children who were struck by gunfire, was not simply the result of reckless violence. It was a preventable calamity, borne of systemic failures and negligence from the top down.

2. This terror was perpetrated by young men wielding pistols and short-barreled rifles, which were easily hidden and carried into the Kansas City Super Bowl Celebration Rally (“Celebration Rally” or the “Rally”) that lacked adequate security measures.

3. The mass shooting at the Rally was the foreseeable and entirely preventable result of a chain of events initiated and furthered by Frontier Justice and The Ammo Box (“Gun Sellers”) and facilitated by R.K. Shows Mo. Inc. (“RK Shows”). Instead of taking steps to prevent or mitigate the risks of tragedies like the Rally, these Gun Sellers and RK Shows facilitate violence for profit. They use sales and marketing practices to create and feed a consumer base of young, impulsive men to line their pockets. When their consumers foreseeably use their firearms to commit criminal and mass shootings, the families and victims suffer while the Gun Sellers celebrate boosted sales. The Gun Sellers, RK Shows, and the gun industry as a whole, know that demand for their weapons increase in the aftermath of mass shootings. Rather than behave responsibly, the gun industry stokes fear of gun regulations after each shooting to increase their

own sales.

4. The marketing and sales practices of the Gun Sellers and others within the gun industry combined with the lax supervision by entities like RK Shows are the beginning and pivotal links in a foreseeable and predictable chain of events resulting in numerous criminal and mass shootings in America each year. The Gun Sellers continue to intentionally and recklessly advertise, market, promote, and sell a warrior mentality that a certain subset of young men fantasize about. The Gun Sellers refuse to take even simple straightforward steps to prevent or discourage young, impulsive, would-be mass shooters from acquiring their weapons, such as implementing age gates on social media channels, warning customers about the dangers of assault rifles and firearms generally, or making it harder for individuals like the shooters to acquire their products.

5. For years Gun Sellers and other entities in the gun industry have, through their misconduct and unlawful practices, been able to profit off the actions of disturbed young men like the shooters here. They willfully ignored the public's right to be safe from violence by placing weapons of war in the shooters' hands through their lax sales practices. Gun Sellers must be held accountable for the criminal and mass shooting at the Celebration Rally.

6. It starts with the retailers. Gun Sellers are the first line of defense against straw purchasers—someone who buys a firearm for someone who is prohibited by law from possessing one, or for someone who does not want their name associated with it.<sup>1</sup> As such, Gun Sellers play a pivotal role in safeguarding our communities by ensuring that the deadly weapons they sell do not end up in the wrong hands. But Gun Sellers abandoned this role and their community. Gun Sellers turn a blind eye to signs indicating an illegal sale to a straw purchaser. These sham

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<sup>1</sup> Jim Salter, *Facts About Straw Purchases of Weapons, and What's Being Done to Stop Them*, AP (Mar. 14, 2024 4:01 PM EST), <https://apnews.com/article/straw-purchases-firearms-guns-explainer-61cd09447ff41e887b2af1cde58dffaf>.

purchases evade background checks and enable criminals and those with mischievous intent to obtain these deadly weapons easily, exacerbating the risk of tragedy like experienced at the Celebration Rally.

7. Event planners and premises owners (as well as those temporarily occupying the premises) too play a pivotal role in ensuring safety. These entities are entrusted with the safety and security of the invitees at a public gathering. At the Celebration Rally, inadequate security measures left hundreds of thousands of invitees vulnerable, stoking the perfect storm for reckless violence to inflict harm unchecked. While there may have been officers spread amongst the parade route, Union Station, and the National WWI Museum and Memorial, the Rally was completely devoid of physical security measures, such as checkpoints and metal detectors, which are necessary at mass gathering events that would have avoided this tragedy altogether.

8. Responsibility for the shooting and injuries does not solely lie with the perpetrators of the shooting—systemic failures and negligence at multiple levels contributed to this tragedy. Had laws been followed and had there been proper planning and adequate security protocols, the consequences of this reckless violence could have been mitigated or stopped altogether. Unfortunately, this was not the case.

9. This case is especially important now, given both the likelihood of another Celebration Rally, as well as the certainty of another mass gathering event at the Liberty Memorial, when the 2026 FIFA World Cup takes place.

10. As a result of Defendants' wrongful and negligent acts and omissions, one person was killed and 22 others were injured by gunfire, including 11 children. Almost 20 other individuals were injured because of the sheer chaos that ensued following the gunfire.

11. Plaintiff Erika Reyes suffered severe, permanent, and progressive injuries after

being struck by gunfire and witnessing family members being severely injured by gunfire.

12. Likewise, Plaintiff Reyes's minor children M.R. 1 and M.R. 2 also suffered severe, permanent, and progressive injuries after being struck through their lower extremities by gunfire.

13. Plaintiffs Reyes, M.R. 1, M.R. 2, and M.R. 3 were all in close proximity to the shooters and the victims of the gun violence and had close relationships with the victims. As a result, Plaintiff Reyes, M.R. 1, M.R. 2, and M.R. 3 all suffered severe emotional distress and anxiety.

14. Defendants each caused or contributed to cause the injuries sustained by Plaintiff Reyes and her minor children, as such, the independent acts and omissions of Defendants resulted in indivisible injuries to Plaintiff Reyes and her minor children. As a result, Defendants are jointly and severally liable for the injuries to Plaintiffs.

15. Plaintiffs Esmeralda Ortiz and J.O. were both in close proximity to the shooters and the victims of the gun violence and had close relationships with the victims. As a result, both Esmeralda Ortiz and J.O. suffered severe emotional distress and anxiety.

16. Defendants each caused or contributed to cause the injuries sustained by Plaintiff Ortiz and her minor child, as such, the independent acts and omissions of Defendants resulted in indivisible injuries to Plaintiff Ortiz and her minor child. As a result, Defendants are jointly and severally liable for the injuries to Plaintiffs.

17. Plaintiffs Kathleen Martinez and her children (M.M. 1 and M.M. 2) were in close proximity to the shooters and the victims of the gun violence and had close relationships with the victims. As a result, Plaintiff Martinez and her children suffered severe emotional distress and anxiety.

18. Plaintiff M.M. 2 suffered severe, permanent, and progressive injuries after being

struck on her lower extremity by gunfire.

19. Defendants each caused or contributed to cause the injuries sustained by Plaintiff Martinez and her minor children, as such, the independent acts and omissions of Defendants resulted in indivisible injuries to Plaintiff Martinez and her minor children. As a result, Defendants are jointly and severally liable for the injuries to Plaintiffs.

**PARTIES**

**A. PLAINTIFFS**

- 20. Erika Reyes is a citizen and resident of the State of Kansas.
- 21. M.R. 1 is a citizen and resident of the State of Kansas.
- 22. M.R. 2 is a citizen and resident of the State of Kansas.
- 23. M.R. 3 is a citizen and resident of the State of Kansas.
- 24. Esmeralda Ortiz is a citizen and resident of the State of Missouri
- 25. J.O. is a citizen and resident of the State of Missouri.
- 26. Kathleen Martinez is a citizen and resident of the State of Kansas.
- 27. M.M. 1 is a citizen and resident of the State of Kansas.
- 28. M.M. 2 is a citizen and resident of the State of Kansas.

**B. CRIMINAL DEFENDANTS**

- 29. Defendant Dominic Miller is a citizen and resident of Jackson County, Missouri.
- 30. Defendant Lyndell Mays is a citizen and resident of Jackson County, Missouri.
- 31. Defendant Terry Young is a citizen and resident of Jackson County, Missouri.
- 32. On information and belief John Doe 1 is a citizen and resident of Missouri.
- 33. On information and belief John Doe 2 is a citizen and resident of Missouri.
- 34. On information and belief John Doe 3 is a citizen and resident of Missouri.
- 35. Defendant Fedo Antonia Manning is a citizen and resident of Jackson County,

Missouri.

36. Defendant Ronnel Dewayne Williams Jr. is a citizen and resident of Jackson County, Missouri.

37. Defendant Chaelyn Hendrick Groves is a citizen and resident of Jackson County, Missouri.

### **C. PREMISES DEFENDANTS**

38. Defendant Union Station Kansas City, Inc. (“Union Station”), is a nonprofit corporation organized under the laws of Missouri, with its principal place of business at 30 West Pershing Suite 400, Kansas City, Missouri 64108. Union Station owns and operates the land on which the Celebration Rally and Union Station’s failures occurred.

39. Defendant City of Kansas City (the “City”) is a public entity formed and operating under the laws of Missouri. The City, through its Property and Insurance Division, owns and operates the property located at 2 Memorial Dr. Kansas City, Missouri 64108 (“National WWI Museum and Memorial”) on which the Celebration Rally and the City’s failures occurred. In addition, the City collaborated with the Event Planning Defendants to plan and provide security for the Celebration Rally. The City’s inadequate security measures created a dangerous condition on the City’s property that directly caused Plaintiffs’ shooting-related injuries. These shooting-related injuries were a foreseeable result of the City implementing and erecting inadequate security measures on its property considering similar shootings around the country at similar events. The City, through several employees in the course of their employment, created this dangerous condition when they approved the permit for the Celebration Rally without any adequate security plan or measures to protect the patrons. The City had actual and constructive notice of the dangers on its property that would result in injuries like Plaintiffs and had sufficient time before Plaintiffs’ injuries to correct the dangerous condition. On information and belief, the City maintains liability

insurance applicable to cover Plaintiffs' injuries arising from the shooting at the Celebration Rally under Mo. Rev. Stat. §§ 71.185; 537.600. Plaintiffs' foreseeable injuries were caused, in part, by the dangerous condition the City created on its property when it enacted and erected inadequate security measures on its property.

#### **D. EVENT PLANNING DEFENDANTS**

40. Defendant The Greater Kansas City Sports Commission ("KC Sports Commission") is a nonprofit corporation organized under the laws of Missouri, with its principal place of business at 1100 Walnut Street, Suite 3450B Kansas City, Missouri 64106. The KC Sports Commission is identified as a contact for PW-EV-2024-00006, which is the permit number assigned to the parade and Rally.<sup>2</sup>

41. Defendant O'Neill Events & Marketing ("O'Neill Events") is a fictitious name registered with the state of Missouri, with its principal place of business at 1607 Oak St. Kansas City, Missouri 64108. O'Neill Events is 100% owned by Keli Wenzel, located at 1607 Oak St. Kansas City, Missouri 64108. The KC Sports Commission represents that it collaborated with O'Neill Events, among others, to plan the Rally.<sup>3</sup>

42. Defendant Flyover Event Co. LLC ("Flyover") is a limited liability company organized under the laws of Kansas, with its principal place of business at 10685 Riggs Dr. Overland Park, Kansas 66212. Flyover is identified as a contact for PW-EV-2024-00006, which is the permit number assigned to the parade and Rally.<sup>4</sup>

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<sup>2</sup> *Permit Number: PW-EV-2024-00006*, COMPASSKC, [https://compasskc.kcmo.org/EnerGov\\_Prod/SelfService/#!/permit/d20fff34-0398-4d65-80a1-ae42f392ac91?tab=contacts](https://compasskc.kcmo.org/EnerGov_Prod/SelfService/#!/permit/d20fff34-0398-4d65-80a1-ae42f392ac91?tab=contacts) (last visited May 21, 2025).

<sup>3</sup> *Chiefs Kingdom Champions Parade and Rally to be Held on Wednesday, February 14*, KC SPORTS COMMISSION (Feb. 11, 2024), <https://www.sportkc.org/2024-press-releases/chiefs-kingdom-champions-parade>.

<sup>4</sup> *See supra* note 2.

**E. SELLERS**

43. Defendant Frontier Justice LS, LLC (“Frontier Justice”), is a foreign limited liability company organized under the laws of Indiana, registered to do business in the state of Missouri with its principal place of business at 135 N. Pennsylvania St. Ste. 1610, Indianapolis, Indiana 46204.

44. Defendant The Ammo Box L.L.C. is a limited liability company organized under the laws of Missouri, with its principal place of business at 8600 N. Route E Columbia, Missouri 65202

45. Defendant R.K. Shows Mo. Inc. is a corporation organized under the laws of Missouri with its principal place of business at 1570 255<sup>th</sup> ST. P.O. Box 304, Manchester, Iowa 52057.

**JURISDICTION AND VENUE**

46. This action arises from Defendants’ transaction of business, making of contracts, and tortious actions within the State of Missouri.

47. Venue is proper in the Western Division of this Court pursuant to Mo. Rev. Stat. §§ 508.010.4 and 478.461 since Plaintiffs were first injured by the wrongful or tortious conduct alleged in the Petition in the western portion of Jackson County, Missouri and since defendants are located in Jackson County, Missouri.

**STATEMENT OF FACTS**

**F. ASSAULT RIFLES AND THE AR-15**

48. The assault rifles manufactured and promoted by the Gun Sellers and gun industry as a whole to individuals like the shooters have military origins. They are designed to kill as many people as possible as quickly as possible.

49. The first AR-15 rifles were designed in 1957 by Armalite, a small arms engineering

company, for the U.S. military. Armalite's goal was to create a lightweight portable select-fire rifle that would allow soldiers to quickly put many rounds on target from distances of a quarter mile or more. The AR-15 was designed to be effective in combat and to kill or disable as many enemy soldiers as possible as quickly as possible, even from far away. Although Armalite developed the first AR-15, today "AR-15" designates the type of firearm, rather than the brand.

50. The distinctive appearance of assault weapons is the result of the gun's functional design. Assault weapons "have incorporated into their design specific features that enable shooters to spray ('hose down') a large number of bullets over a broad killing zone, without having to aim at each individual target. These features not only give assault weapons a distinctive appearance, they make it easy to simply point the gun while rapidly pulling the trigger."<sup>5</sup> These intentional design features make assault weapons particularly lethal.

#### **G. WHAT ARE SHORT-BARRELED RIFLES AND WHY ARE THEY DANGEROUS**

51. One of the criminal defendants chose a short-barreled rifle manufactured, marketed, and sold by Anderson Manufacturing under the misleading model name "AM-15 Pistol" to carry out his attack.

52. Another criminal defendant used a short-barreled rifle manufactured, marketed, and sold by Stag Arms under the misleading model name "Stag Arms Model-15 300 Caliber Pistol" to carry out his attack.

53. These guns are AR-15-style weapons, more similar in design and function to a full-length AR-15 rifle than to a typical pistol.

54. Both firearms were marketed as being like rifles.

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<sup>5</sup> Tom Diaz, *Understanding the Smith & Wesson M&P15 Semiautomatic Assault Rifle Used in the Aurora, Colorado Mass Murder* (Violence Policy Center, July 2012), <https://vpc.org/studies/M&P15.pdf>.

55. Short-barreled rifles, as the name suggests, feature barrels that are shorter than those of their full-length counterparts. Shorter barrels make them easier to conceal, transport, and maneuver in tight spaces. And in fact, the short-barreled rifles at issue here were at least in part concealed in backpacks during the parade and likely on criminal defendants' persons.

56. Bullets discharged by AR-15-style short-barreled rifles travel with significantly higher velocity than bullets discharged by conventional pistols. Short-barreled rifles, such as AM-15 Pistol and Stag Arms Model 15 Pistol, are designed to use rifle-caliber ammunition rather than handgun ammunition. As compared to wounds caused by typical handgun ammunition, wounds caused by high-velocity, rifle-caliber ammunition generally cause more widespread and catastrophic damage to the human body.

57. Short-barreled rifles, like their full-length counterparts, are intended to be fired from the shoulder. The design, weight, recoil, and power are such that they are impractical and unsafe to fire single handedly. "Shouldering" a rifle enables a shooter to direct the rifle's firepower more accurately and better manage the rifle's recoil.

58. AR-15-style short-barreled rifles, such as the those used by the shooters, combine devastating firepower with the concealability and maneuverability of smaller guns.

59. The AR-15 style "pistols" function similarly to normal AR-15 style rifles. However, critically, these AR-15 "pistols" have shorter barrels and are more easily concealed.

60. The AR-15 style "pistols" feature shortened versions of the same or similar rail systems available on other full length AR-15 style rifles.

61. As a result of these design choices, AR-15 style "pistols" are significantly deadlier than other true pistols on the market.

62. The application process for a civilian consumer seeking to own a short-barreled

rifle includes providing fingerprints and a photo for a comprehensive background check, notification to the chief law enforcement officer in the applicant's locality, payment of a \$200 tax, and approval by Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF")—a process that typically takes as long as seven months to complete.

63. AR-15 style weapons have become the weapon of choice for the deadliest mass shooters. Since their proliferation in the market, AR-15 style "pistols" have been used in multiple mass shootings, including the shooting that is the subject of this action. In 2019 a gunman used an Anderson Manufacturing AM-15 "pistol" to shoot and kill 9 people and wound a total of 27 people. This carnage all occurred in the 30 seconds between the gunman opening fire and police killing the gunman.<sup>6</sup>

#### **H. GUN SELLERS TURNED A BLIND EYE TO STRAW PURCHASERS**

##### **1. Frontier Justice Ignored Clear Signs that Fedo Antonia Manning was a Straw Purchaser**

64. From May 11, 2022 until January 13, 2023, Defendant Fedo Antonia Manning ("F. Manning") purchased 40 firearms, 33 (or nearly 83%) of those were Anderson Manufacturing AM-15 style firearms, all purchased as lower receivers.

65. Between May and October 2022, F. Manning purchased at least 23 firearms from Frontier Justice. Often multiple guns in the same day or within a short time period, i.e. on May 11, 2022, F. Manning purchased 3 AM-15 firearms; on May 21, 2022 F. Manning purchased two AM-15 firearms, the next day on May 22, 2022, F. Manning returned to Frontier Justice and purchased an additional AM-15 and a Glock; on June 15, 2022, F. Manning purchased three AM-15 firearms, three days later on June 18, 2022, F. Manning returned to Frontier Justice and

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<sup>6</sup> Bill Chappell, The Pistol That Looks Like A Rifle: The Dayton Shooter's Gun, NPR, August 8, 2019.

purchased two additional AM-15 firearms.

66. Of the 40 firearms purchased by F. Manning as a straw purchaser during this time span, over half of them were from Frontier Justice. Of the 23 firearms purchased from Frontier Justice, 22 or 95% of them were AM-15 firearms. On information and belief, F. Manning frequented Frontier Justice because he knew it to be an easy place to purchase firearms where no one would question his purchases. Upon information and belief, he targeted AM-15 firearms because they were cheap, easy to conceal, and marketed as SBRs.

67. Defendant Frontier Justice knew or should have known that private firearms collectors do not typically purchase the same make and model firearm with no variation for personal use. The repetitive nature of F. Manning's purchases was indicative of straw purchasing and firearms trafficking. Frontier Justice knew or should have known that F. Manning was a straw purchaser.

68. Defendant F. Manning has entered into a plea agreement admitting that he was purchasing these firearms as a straw purchaser.<sup>7</sup>

## **2. The Ammo Box Ignored Clear Signs that Ronnel Dewayne Williams, Jr. ("Williams") was a Straw Purchaser**

69. Defendant Ronnel Dewayne Williams, Jr. purchased a Stag-15 "pistol" receiver from The Ammo Box at the RK Gun Show on November 25, 2023—81 days before the shooting at the Chief's Super Bowl Parade.

70. Williams purchased the Stag-15 lower receiver for and at the direction of Chaelyn Hendricks Groves ("Groves"), a 19-year old not legally allowed to purchase a pistol. A lower receiver can easily be converted into a rifle or a pistol, as such an FFL cannot lawfully sell or

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<sup>7</sup> *Press Release, U.S. Dep't of Justice, KC Man Pleads Guilty to Illegal Firearms Trafficking* (Apr. 17, 2025), <https://www.justice.gov/usao-wdmo/pr/kc-man-pleads-guilty-illegal-firearms-trafficking-0>.

transfer the lower receiver to an individual under twenty-one years of age. According to Williams, he and Groves went to the R.K. Gun Show looking for receivers to buy. Groves found a receiver he wanted, the Stag-15 “pistol,” and gave Williams the money to buy it for him. The firearm was approximately \$250. At a subsequent RK Gun Shows Event on December 16-17, 2023, Groves subsequently purchased a 300-blackout upper to complete the firearm.

71. According to Williams, he and Groves among others would go to RK Gun Shows events and “all be buying lowers and we just put them together however we want to.”

72. The RK Gun Shows event on November 25, 2023 at the KCI Expo Center was open to all ages, selling tickets to “Kids” as low as \$6 and to “Adults” as low as \$14.

73. According to RK Shows, it provided “security and check-in points” for the safety of their attendees and vendors.

74. Buying a gun at the direction of someone else and exchanging money prior to the purchase of the firearm in the purview of the The Ammo Box at the RK Gun Show are both behaviors indicative of a straw purchase.

75. The Ammo Box either knew or should have known that Williams was a straw purchaser.

### **3. The Problem with Gun Shows**

76. Gun shows are particularly problematic when it comes to straw purchases. This is due to the combination of having both FFL sellers and private sellers.

77. According to the ATF, 30 percent of guns involved in federal illegal gun trafficking investigations are connected in some way to gun shows.<sup>8</sup>

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<sup>8</sup> U.S. Dep’t of the Treasury, Bureau of Alcohol, Tobacco & Firearms, *Following the Gun: Enforcing Federal Laws Against Firearms Traffickers* (June 2000), <https://www.atf.gov/firearms/docs/report/following-gun-report-2000/download>.

78. This is in part due to the private sales that happen at gun shows, however, the FFLs at gun shows are also part of the problem.<sup>9</sup> Nearly 20% of the ATF's investigations involved FFLs selling firearms "off-the-book."<sup>10</sup>

79. According to the ATF felons were involved in 46% of the ATF's investigations that involved gun shows.<sup>11</sup> Even when a licensed dealer was the main subject of the investigation, felons were still involved in at least 6% of the investigations.<sup>12</sup>

80. When unscrupulous licensed gun dealers act in conjunction with other types of traffickers, the average number of guns illegally sold increases dramatically.<sup>13</sup>

81. According to the ATF, the average number of firearms trafficked per investigation when only a gun show is involved is 87.9, compared to 316.5 firearms trafficked per investigation when a gun show and a licensed gun dealer are involved in the trafficking.<sup>14</sup>

82. In an investigative report, New York City conducted an investigation into FFLs at gun shows and found that 16 of 17 the FFLs they tested would willingly sell guns to a person despite clear indication that the sale was a straw purchase.<sup>15</sup>

83. These statistics are alarming and further emphasize how important it is that gun shows are scrupulous in deciding which licensed gun dealers are permitted to sell at their shows.

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<sup>9</sup> Press Release, Office of the Mayor, Mayor Bloomberg Releases Report on City's Progress in Reducing Homelessness (July 2009), [https://www.nyc.gov/html/om/pdf/2009/pr442-09\\_report.pdf](https://www.nyc.gov/html/om/pdf/2009/pr442-09_report.pdf); U.S. Departments of Justice and Treasury, Gun Shows: Brady Checks and Crime Gun Traces, at 26 (January 1999).

<sup>10</sup> U.S. Dep't of the Treasury, Bureau of Alcohol, Tobacco & Firearms, Gun Shows: Brady Checks and Crime Gun Traces (Jan. 1999), <https://www.atf.gov/resource-center/docs/guide/gun-shows-brady-checks-and-crime-gun-traces-199/download>.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> *Supra* note 9.

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*

**I. FEBRUARY 14<sup>TH</sup> 2024 KANSAS CITY PARADE AND RALLY**

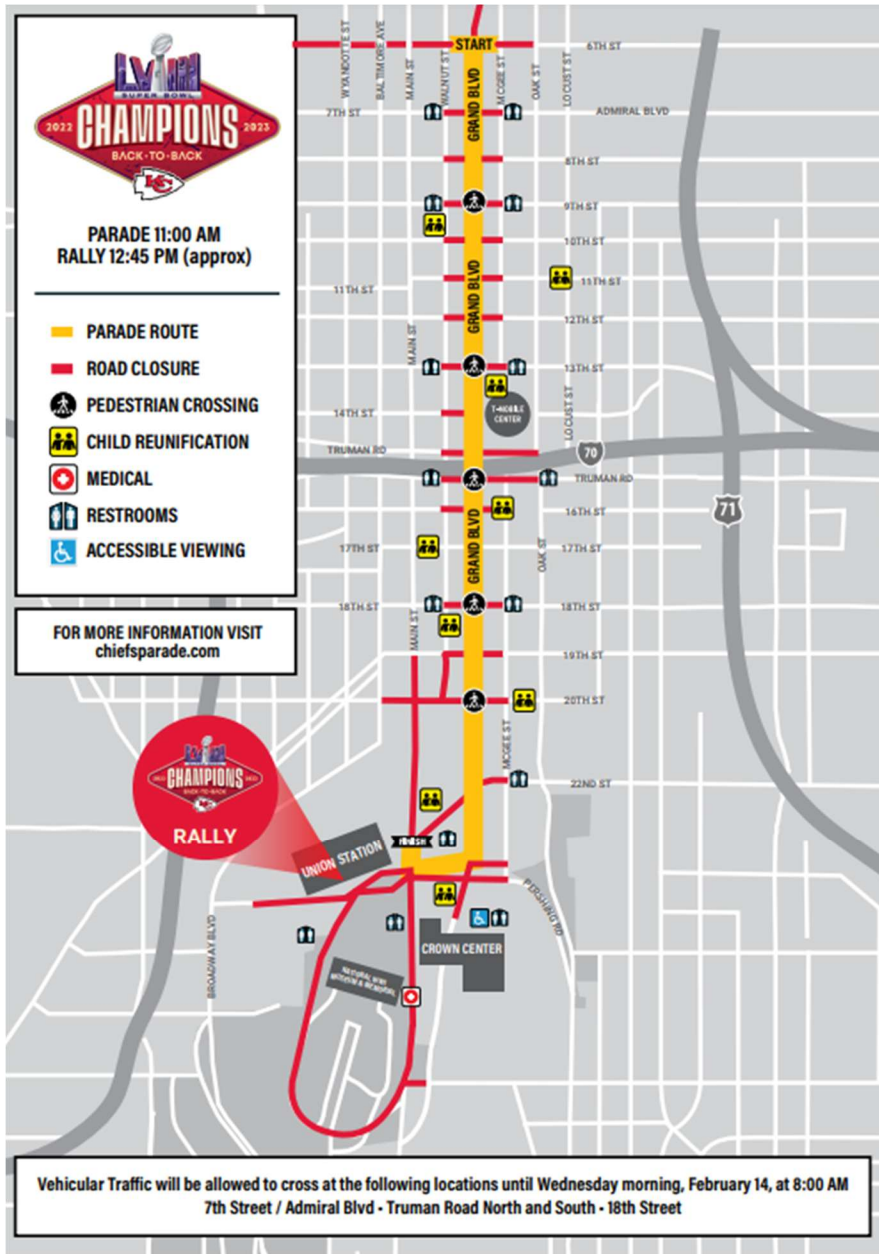
84. The Kansas City Parade kicked off at 11 a.m. at 6<sup>th</sup> Street and Grand Boulevard.

85. The Parade traveled south on Grand Boulevard, then west on Pershing Road, north on Main Street and culminated at Union Station.

86. Following the Parade, the Rally took place in front of Union Station and the National WWI Museum and Memorial north lawn.<sup>16</sup>

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<sup>16</sup> *Chiefs Kingdom Champions Parade and Rally to be Held on Wednesday, February 14*, SportsKC (Feb. 11, 2024), <https://www.sportkc.org/2024-press-releases/chiefs-kingdom-champions-parade>.



- 87. As shown above, the Parade and Rally are two different events.
- 88. The Subject Incident occurred at the Rally and not the Parade.



89. The identified area in the two above images is the approximate location of the Subject Incident. Accordingly, the Subject Incident took place at the Rally and not the Parade.

90. The Rally itself was held on property owned by Union Station and the City, and the shooting took place in part on property owned by Union Station.

91. The Rally and Parade are subject to their own safety measures.

92. Thus, adequate safety measures for the Parade may not be adequate for the Rally. And vice versa.

## **J. HISTORY OF GUN VIOLENCE IN SIMILAR CIRCUMSTANCES**

93. Unfortunately, gun violence at mass events (intentional and nonintentional) has become commonplace. For example, the 2022 Highland Park Shooting at the Fourth of July parade in Highland, Illinois. Seven people were killed and more than 30 injured after a gunman equipped with an AR-styled rifle opened fire from a rooftop into the crowd. The wounded ranged in age from 8 to 80s.

94. In addition, several people were injured at the annual J'ouvert Parade, part of Boston's Caribbean Festival because of an unrelated shooting. In August 2023, two males were involved in a shootout where a Polymer 80 pistol with a "Glock switch" was recovered from a 17-year-old. Stray bullets from the shootout wounded six males and two females. According to officers, the shooting happened on the outskirts of the J'ouvert Parade.

95. In June 2023, two people were injured in a shooting after the Denver Nuggets' championship parade. A few after, multiple bullets were fired near the Texas Rangers World Series Victor Parade. And, in 2019, during the Toronto Raptors' NBA championship parade, gunfire left four people wounded after shots were heard near the plaza in front of Toronto's City Hall. Sadly, the list continues.

96. A common factor between the various championship parades and the Subject Parade is the condensed planning time frame. While entities tasked with public safety are likely knowledgeable in handling mass events, the shortened period between the championship win and the victory parade is often just a few short days. For instance, the Chiefs Super Bowl occurred on February 11, 2024, with the parade occurring three days later. More planning time is necessary to better assess the risks for gun violence and enact strategies like restricting crowd sizes or implementing physical security barriers that would help the planners run a safe and secured event.

97. Additionally, the Subject Incident is not the first time gun violence has occurred at

Union Station. In early January 2024, a shooting left one person wounded just outside of Union Station.<sup>17</sup> Then a couple weeks later, in Crown Center (depicted above in the Kansas City Parade and Rally figure), there was a shooting that injured six people.<sup>18</sup>

98. Union Station was also the setting for a mass murder that took the lives of four officers and their prisoner known as the “Kansas City Massacre.”<sup>19</sup> On June 17, 1933, a handful of criminals attempted to rescue a federal prisoner who was being transported to the U.S. Penitentiary at Leavenworth, Kansas. While transferring the prisoner at Union Station, the officers were met with gun fire from a machine gun. The gunfire killed four agents and the federal prisoner while wounding others. The “mass murder committed in front of the Union Railway Station shocked the American public into a new consciousness of the serious crime problems in the nation.”<sup>20</sup>

99. With knowledge of the past mass event shootings and criminal history around Union Station, Premises Defendants knew or should have known the consequences of inadequate security measures, including the injury and death of their invitees.

#### **K. MANAGING LARGE-SCALE SECURITY EVENTS**

100. When faced with a mass gathering event, preparation and planning is crucial.

101. There are 19 core operational areas that owners and occupiers of land, security, and event planners should implement when faced with large scale events: (1) Administrative and

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<sup>17</sup> Greg Dailey, *One Wounded in Shooting Across Street from Union Station*, KCTV (Jan. 2, 2024, 10:29 AM), <https://www.kctv5.com/2024/01/02/one-wounded-shooting-across-street-union-station/>.

<sup>18</sup> Savannah Hawley-Bates & Kavahn Mansouri, *After Crown Center Shooting Left 6 Injured, Some Business Owners Want More Security* (Jan. 18, 2024, 4:14 PM), <https://www.kcur.org/news/2024-01-18/after-crown-center-shooting-left-6-injured-some-business-owners-want-more-security>.

<sup>19</sup> *Kansas City Massacre and “Pretty Boy” Floyd*, FBI, <https://www.fbi.gov/history/famous-cases/kansas-city-massacre-pretty-boy-floyd#June-17%201933> (last visited July 15, 2024).

<sup>20</sup> *Id.*

Logistics Support, (2) Command and Control, (3) Credentialing, (4) Crowd Management, (5) Dignitary/VIP Protection, (6) Emerging Technology and Possibilities, (7) Financial/Grant Management, (8) Fire/Emergency Medical Services/Hospitals/Public Health; (9) Intelligence/Counter-terrorism/Counter surveillance; (10) Interagency Communications and Technology; (11) Legal Affairs; (12) Non-event Patrol; (13) Arrest Processing; (14) Protecting Critical Infrastructure and Utilities; (15) Public Information and Media Relations; (16) Screening and Physical Security; (17) Tactical Support and Explosive Device Response/Hazardous Materials; (18) Training; and (19) Transportation and Traffic Management (“19 Core Operations”).<sup>21</sup>

102. Owners and occupiers of land, security, and event planners should also adequately preform these steps: (1) Conduct a Threat Assessment; (2) Meet with Event Organizers and Stakeholders; (3) Conduct a Site Survey (Vulnerability Assessment); (4) Develop a Site Plan; (5) Develop a Crowd Control Plan; (6) Determine Necessary Resources; (7) Develop an Organizational Chart; (8) Assign Specific Personnel; and (9) Conduct Training and Rehearsals.

103. While security personnel is a critical aspect of large-scale security events, other factors such as Screening and Physical Security are just as important.

104. A critical mechanism for event planners and law enforcement to maintain control and public safety during a planned event is establishing security perimeters and checkpoints and providing security for event venues.

105. The primary purpose of setting up security perimeters is to ensure the protection of both people and venues. One part of this is to establish screening protocols. Thus, it is imperative

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<sup>21</sup> *Managing Large-Scale Security Events: A Planning Primer for Local Law Enforcement Agencies*, BUREAU OF JUSTICE ASSISTANCE (Apr. 2018), available at: [https://bjatta.bja.ojp.gov/sites/default/files/Planning%20Primer\\_508c.pdf](https://bjatta.bja.ojp.gov/sites/default/files/Planning%20Primer_508c.pdf).

to set up entry and exit checkpoints where event personnel will screen incoming persons. A key aspect to screening is identifying the items that will be prohibited, such as weapons, alcohol, bottles, and backpacks. The list of prohibited items and screening protocols should be widely publicized before the event and clearly communicated through signage during the event and before the event in conjunction with event announcements.

106. This screening protocol is industry standard for large scale event planners. For example, before the 2023 NFL Draft (which occurred in the same place as the Subject Incident), the NFL widely disseminated through their website that, among other things, “[c]lear bags smaller than 12x12x6 are permitted.”<sup>22</sup> Furthermore, the prohibited items at the draft included alcohol, illegal substances, and “weapons of any kind, to include but not limited to: [f]irearms, weapons, knives, [m]ace/pepper spray and explosives.”<sup>23</sup> The NFL also employed the NFL OnePass as a means for registration and entry into the event which was free – “no purchase necessary.”<sup>24</sup>

107. Event planners and law enforcement should also determine equipment needs and staffing assignments at checkpoints after perimeters have been determined.<sup>25</sup> Such equipment include scanning technologies, such as magnetometers or x-ray machines, as well as physical barriers in the form of, amount other things, cement barricades. Likewise, large city and county

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<sup>22</sup> *2023 NFL Draft Security Procedures*, NFL, <https://web.archive.org/web/20230406034932/https://www.nfl.com/draft/event-info/security-procedures> (last visited July 29, 2024).

<sup>23</sup> *2023 NFL Draft Security Procedures*, NFL, <https://web.archive.org/web/20230406034932/https://www.nfl.com/draft/event-info/security-procedures> (last visited July 29, 2024).

<sup>24</sup> *NFL OnePass App Overview*, NFL (Sep. 1, 2023, 6:29 AM), <https://www.nfl.com/news/nfl-onepass-app-overview>.

<sup>25</sup> *Managing Large-Scale Security Events: A Planning Primer for Local Law Enforcement Agencies*, BUREAU OF JUSTICE ASSISTANCE (Apr. 2018), available at: [https://bjatta.bja.ojp.gov/sites/default/files/Planning%20Primer\\_508c.pdf](https://bjatta.bja.ojp.gov/sites/default/files/Planning%20Primer_508c.pdf).

vehicles, garbage trucks, snow plows, or school buses can be used to secure and protect the perimeter instead of purchasing Jersey barriers.

108. Again, the 2023 NFL draft also employed physical barriers. The draft included fencing and hardened concrete barriers encircling the area around Union Station and the National WWI Museum and Memorial.<sup>26</sup>

109. According to James Dudley, a former deputy chief of the Patrol Bureau for the San Francisco Police Department, checkpoints could be set up even for large events.<sup>27</sup> Checkpoints “provide a secure entrance point for attendees and, if properly managed, can ensure that threats are detected without impacting the fan experience.”<sup>28</sup> Unfortunately, “checkpoints are an afterthought or not managed to the correct extent.”<sup>29</sup> While checkpoints may be logistically more challenging, they were still employed at the World Cup in Paris.<sup>30</sup>

110. According to Dudley, “[f]or blocks and blocks and blocks around the plaza, the grassy plazas that overlook the Eiffel Tower, there were checkpoints and so French police, Paris police managed to set up checkpoints in this humongous location so that from any point to go into this central area, you had to go through a checkpoint.”<sup>31</sup>

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<sup>26</sup> Tod Palmer, *Stages For 2023 Draft in Kansas City will be Largest in NFL Draft History*, KSHB (Apr. 14, 2023), <https://www.kshb.com/news/local-news/kc-on-the-clock/stage-for-2023-draft-in-kansas-city-will-be-largest-in-nfl-draft-history>.

<sup>27</sup> Katie Moore & Mike Hendricks, *KC Police Won't Share Lessons from Chiefs Rally Shooting, But Experts Have Suggestions*, THE KANSAS CITY STAR (Mar. 25, 2024, 2:29 PM), <https://www.kansascity.com/news/local/article286680195.html>.

<sup>28</sup> Andrew Goldsmith, *3 Key Factors for Effective Event Security Checkpoints*, SECURITY MAGAZINE (Sep. 1, 2013), <https://www.securitymagazine.com/articles/84770-key-factors-for-effective-event-security-checkpoints>.

<sup>29</sup> *Id.*

<sup>30</sup> Katie Moore & Mike Hendricks, *KC Police Won't Share Lessons from Chiefs Rally Shooting, But Experts Have Suggestions*, THE KANSAS CITY STAR (Mar. 25, 2024, 2:29 PM), <https://www.kansascity.com/news/local/article286680195.html>.

<sup>31</sup> *Id.*

111. Dudley also emphasized that “[c]reating a celebration zone with a free ticket could give officials leeway to set up screening zones.”<sup>32</sup> The 2023 NFL Draft experienced this type of celebration zone. “There were three entrances – two near Union Station were for VIPs and staff – but nearly all fans entered through a single gate. Everyone went through a security checkpoint just like at a Chiefs game.”<sup>33</sup> And “[t]hose attending also had to first download an app on their phones before entering and let security scan a code. No loitering was allowed around the perimeter of the event.”<sup>34</sup>

112. SBRs are easily concealed in a standard backpack, which makes SBRs easy to slip into mass-gathered events. Furthermore, given the cold weather in February, it is foreseeable that attendees will wear large jackets and coats that may also contribute to their ability to sneak SBRs into the Rally. However, a Clear Bag Policy and physical security screenings with metal detectors and checked bags would have stopped SBRs from making their way into the Subject Event.

**L. PREMISES DEFENDANTS AND EVENT PLANNING DEFENDANTS FAILURE TO EMPLOY ADEQUATE SAFETY MEASURES TO SECURE THE PREMISES WAS A PROXIMATE CAUSE OF THE INJURIES TO PLAINTIFFS**

113. Premises Defendants and Event Planning Defendants were aware of these past parade and mass-gathering event disasters and gun violence near and around Union Station but did not adequately plan and implement strategies to mitigate the same from happening here.

114. Screening and Physical Security such as that outlined above, including the 19 Core Operations, should have been employed by the Premises Defendants and Event Planning Defendants.

115. Premises Defendants and Event Planning Defendants breached their duties of care

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<sup>32</sup> *Id.*

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*

to Plaintiffs. The Subject Incident and injuries were the direct and proximate result of the negligence, carelessness, violations and failures of Premises Defendants and Event Planning Defendants to exercise reasonable care, including, but not limited to, the following:

- a. Failing to adequately plan the security for the Rally;
- b. Failing to adequately stage/employ SWAT Trained Officers around the venue;
- c. Failing to maintain an adequate memorandum of understanding for partnerships with law enforcement;
- d. Failing to provide effective communication to public regarding overall potential risks to attending;
- e. Failing to engage a spectator management plan (e.g., a plan for ticketing the event and admittance, inspection, ushering, seating/standing, public announcements, etc.);
- f. Failing to engage in crowd management/crowd control with mechanisms used to maintain order or reinstate order, such as limited access control, admission control, and sufficient monitoring and policing (including failing to monitor and diffuse crowd tension);
- g. Failing to have and adequately broadcast a plan for evacuation and exit management and to engage in safe evacuation to lead spectators away from violence;
- h. Failing to implement a “Clear Bag Policy”;
- i. Failing to implement a list of prohibited items;
- j. Failing to implement one or more security checkpoints;
- k. Failing to implement a system requiring a free ticket to gain entry;

- l. Failing to set up adequate physical security barriers such as Jersey barriers and cement barriers; and
- m. Failing to maintain reasonable security equipment like scanning technologies, such as magnetometers or x-ray machines.

116. As a direct and proximate result of Premises Defendants' and Event Planning Defendants' negligence, carelessness, violations and omissions, Plaintiffs sustained severe physical injuries and death.

117. Defendants are directly liable for their own negligence, carelessness, failures and violations that were the direct and proximate result of the Subject Incident and resulting injuries. Defendants are also liable for the negligence, carelessness, failures and violations of their agents.

118. As a direct and proximate result of Premises Defendants' and Event Planning Defendants' misconduct, Plaintiffs have suffered and will continue to suffer damages including but not limited to:

- a. Past medical, rehabilitation, and life care costs;
- b. Future medical, rehabilitation, and life care casts;
- c. Past pain, suffering, loss of enjoyment of life, and emotional distress;
- d. Future pain, suffering, loss of enjoyment of life, and emotional distress;
- e. Loss wages; and
- f. Impaired earning compacity

**CAUSES OF ACTION**

**COUNT I – BATTERY**

***(against Defendant Dominic Miller, Defendant Lyndell Mays, Defendant Terry Young, Defendant Doe 1, Defendant Doe 2, and Defendant Doe 3)***

119. Plaintiffs repeat and reallege every allegation set forth in the preceding paragraphs.

120. On February 14, 2024, with malicious intent, the Shooting Defendants fired into a crowd of rally attendees using an arsenal of weapons.

121. The Shooting Defendants killed one person, injured dozens of others, and terrorized an untold number of others.

122. The foregoing conduct was deliberate and outrageous and was conducted with the intent to terrify, and to injure, maim, and kill people at the rally, including Plaintiffs, and as such, constituted an intentional harmful or offensive contact with all Plaintiffs physically struck by projectiles and/or shrapnel.

123. As a direct and foreseeable result of the Shooting Defendants' actions, Plaintiffs have sustained and will sustain physical pain, mental suffering, loss of enjoyment of life, anxiety, and severe emotional distress.

124. As a direct and proximate result of the Shooting Defendants' actions, Plaintiffs have incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

125. Accordingly, Plaintiffs are entitled to recovery against the Shooting Defendants in an amount to be determined at trial.

WHEREFORE, Plaintiffs pray for damages to compensate them for injuries and harms suffered, for prejudgment and post-judgment interest, punitive damages, costs, and all other relief the Court finds just and proper.

### **COUNT II – ASSAULT**

***(against Defendant Dominic Miller, Defendant Lyndell Mays, Defendant Terry Young, Defendant Doe 1, Defendant Doe 2, and Defendant Doe 3)***

126. Plaintiffs repeat and reallege every allegation set forth in the preceding paragraphs.

127. On February 14, 2024, with malicious intent, the Shooting Defendants fired into a

crowd of rally attendees using an arsenal of weapons.

128. The Shooting Defendants killed one person, injured dozens of others, and terrorized an untold number of others.

129. The foregoing conduct was deliberate and outrageous and was conducted with the intent to terrify, and to injure, maim, and kill people at the rally, including the Plaintiffs.

130. Plaintiffs, whether struck by projectiles and/or shrapnel or not, experienced reasonable apprehension of imminent offensive contact as a direct and proximate result of the Shooting Defendants' intentional actions.

131. As a direct and foreseeable result of the Shooting Defendants' actions, Plaintiffs have sustained and will sustain mental suffering, loss of enjoyment of life, anxiety, and severe emotional distress.

132. As a direct and proximate result of the Shooting Defendants' actions, Plaintiffs have incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

133. Accordingly, Plaintiffs are entitled to recovery against the Shooting Defendants in an amount to be determined at trial.

WHEREFORE, Plaintiffs pray for damages to compensate them for injuries and harms suffered, for prejudgment and post-judgment interest, punitive damages, costs, and all other relief the Court finds just and proper.

**COUNT III – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS and  
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

***(against Defendant Dominic Miller, Defendant Lyndell Mays, Defendant Terry Young,  
Defendant Doe 1, Defendant Doe 2, and Defendant Doe 3)***

134. Plaintiffs repeat and reallege every allegation set forth in the preceding paragraphs.

135. On February 14, 2024, with malicious intent, the Shooting Defendants fired into a

crowd of rally attendees using an arsenal of weapons.

136. As set forth in the various counts and allegations in this complaint the Shooting Defendants were enabled to purchase or otherwise obtain the firearms through the conduct of the Straw Purchaser Defendants and Gun Seller Defendants.

137. Each Defendants' conduct was both extreme and outrageous.

138. Because of Plaintiffs' proximity to the Shooting Defendants as well as other shooting victims, Plaintiffs were in the zone of physical danger.

139. Plaintiffs Erika Reyes, M.R. 1, M.R. 2, and M.M. 2 as shooting victims, were directly impacted by the Shooting Defendant's conduct.

140. Plaintiffs reasonably experienced fear for their own safety because of the Shooting Defendants' conduct.

141. As a direct and proximate cause of the Shooting Defendants' conduct, Plaintiffs experienced emotional distress, as well as physical injury and illness resulting from the emotional distress, including but not limited to physical pain, mental suffering, loss of enjoyment of life, anxiety and severe emotional distress.

142. As a direct and proximate cause of the Shooting Defendants' conduct, Plaintiffs have incurred economic damages, including lost future income, lost earning capacity, and past and future medical expenses and related expenses.

143. Accordingly, Plaintiffs are entitled to recovery against the Shooting Defendants in an amount to be determined at trial.

WHEREFORE, Plaintiffs pray for damages to compensate them for injuries and harms suffered, for prejudgment and post-judgment interest, punitive damages, costs, and all other relief the Court finds just and proper.

**COUNT IV – NEGLIGENT ENTRUSTMENT**

***(against Defendant Frontier Justice LS, LLC and Defendant Manning)***

144. Plaintiffs repeat and reallege every allegation set forth in the preceding paragraphs.

145. Defendant Frontier Justice sold firearms to Defendant Manning.

146. Defendant Manning has now entered a plea agreement wherein he admits to being a straw purchaser.

147. Defendant Frontier Justice sold the AM-15 firearm, bearing serial number 22022228 to Defendant Manning that was ultimately used and recovered at the rally shooting on February 14, 2024.

148. Defendant Frontier Justice knew or reasonably should have known that Defendant Manning was a straw purchaser and not the ultimate buyer of the firearms. Between May and October 2022 Defendant Manning purchased 23 firearms from Frontier Justice, often within a short time period, and usually the same type of gun. Purchasing multiple of the same type of gun, not typically purchased as a collectable. Purchasing only receivers rather than completed guns. These types of transactions are indicative of straw purchasing and gun trafficking.

149. Defendant Frontier Justice knew or reasonably should have known that Defendant Manning's straw purchasing and gun trafficking created an unreasonable risk of harm to third parties, including Plaintiffs because gun violence is a foreseeable and likely consequence of straw purchases and gun trafficking.

150. Defendant Frontier Justice acted with complete indifference or with reckless disregard for the rights of others in transferring firearms to Defendant Manning. These transfers were made under circumstances indicating a known risk that the firearms would be possessed by persons prohibited from possessing firearms and used in gun violence incidents.

151. Defendant Frontier Justice had possession and control of the firearms that

Defendant Frontier Justice transferred or caused to be transferred to Defendant Manning.

152. Defendant Frontier Justice knew or should have known that their employees and agents who transferred firearms or caused firearms to be transferred to Manning were obliged to use their judgment to refuse to transfer the firearms to a transferee whom the employees and agents knew or should have known were involved in making straw purchases or gun trafficking.

153. Defendant Manning had possession and control of the firearm he purchased from Defendant Frontier Justice. Defendant Manning knowingly transferred the firearms to unknown criminal co-conspirators. Defendant Manning knew that the criminal co-conspirators were not legally allowed to purchase the firearms and posed a risk that these firearms would be possessed by persons prohibited from possessing firearms and used in gun violence incidents.

154. The firearm negligently entrusted by Defendant Frontier Justice to Defendant Manning and by Manning to other persons, was found at the crime scene of the Chiefs Rally shooting and recovered by Kansas City law enforcement agencies.

155. By transferring the firearm to Defendant Manning, Defendant Frontier Justice proximately caused harm to Plaintiffs. By transferring the firearm to individuals who were not permitted to possess the firearm, Defendant Manning proximately caused harm to the Plaintiffs.

156. The conduct of Defendant Frontier Justice and Defendant Manning showed a complete indifference to, and a conscious disregard for, the well-being of Plaintiffs, thereby justifying an award of punitive damages in this matter so as to punish Defendant Frontier Justice and deter others from like conduct in the future.

157. As a result of the conduct of Defendant Frontier Justice and Defendant Manning, Plaintiffs, suffered gunshot wounds as described further herein, leading to additional damages, including emotional harm, mental anguish, anxiety, stress, insomnia, and loss of enjoyment of life.

Plaintiffs have suffered these injuries, continue to suffer them presently, and will continue to suffer them in the future.

158. By reason of the conduct of Defendant Frontier Justice and Defendant Manning set forth herein, Plaintiffs have paid, or become obligated to pay for, and will in the future pay or become obligated to pay for, items of expense in obtaining and receiving counseling, medical care, and treatment.

159. As a direct result of the conduct of Defendant Frontier Justice and Defendant Manning, Plaintiffs have suffered and in the future will continue to suffer an impaired and diminished capacity for work, labor, and pleasure.

160. Plaintiffs are entitled to recover damages in an amount to be determined at trial.

WHEREFORE, Plaintiffs pray for damages to compensate them for injuries and harms suffered, for prejudgment and post-judgment interest, punitive damages, costs, and all other relief the Court finds just and proper.

#### **COUNT V – NEGLIGENT ENTRUSTMENT**

***(against Defendant Ammo Box, Defendant R.K. Shows MO, Inc., Defendant Williams, and Defendant Groves.)***

161. Plaintiffs repeat and reallege every allegation set forth in the preceding paragraphs.

162. Defendant Ammo Box sold the Stag-15 firearm bearing serial number W-0061093 to Defendant Williams at the R.K. Shows Mo, Inc. gun show. This firearm was ultimately used and recovered at the rally shooting on February 14, 2024.

163. Defendant Ammo Box knew or reasonably should have known that Defendant Williams was a straw purchaser for Defendant Groves. Defendant Groves and Defendant Williams attended the gun show together, where Defendant Groves picked out which gun Defendant Williams bought for Defendant Groves. Defendant Ammo Box knew or reasonably should have known that Williams and Groves were co-conspirators.

164. Defendant Ammo Box knew or reasonably should have known that Defendant Williams' straw purchase created an unreasonable risk of harm to third parties, including Plaintiffs because gun violence is a foreseeable and likely consequence of straw purchases.

165. Defendant Ammo Box acted with complete indifference or with reckless disregard for the rights of others in transferring a firearm to Williams or his co-conspirator. This transfer was made under circumstances indicating a known risk that the firearm would be possessed by persons prohibited from possessing firearms and used in gun violence incidents.

166. Defendant Ammo Box had possession and control of the firearm that Ammo Box transferred or caused to be transferred to Williams or Williams' co-conspirator.

167. Defendant Ammo Box knew or should have known that their employees and agents who transferred a firearm or caused a firearm to be transferred to Williams or Williams' co-conspirators were obliged to use their judgment to refuse to transfer the firearm to a transferee whom the employees and agents knew or should have known were involved in making straw purchases.

168. Defendant Williams had possession and control of the firearm he purchased from Defendant Ammo Box. Defendant Williams knowingly transferred the firearm to Defendant Groves. Defendant Williams knew that Defendant Groves was not legally allowed to purchase this firearm and posed a risk that this firearm would be possessed by persons prohibited from possessing firearms and used in gun violence incidents.

169. Defendant Williams had possession and control of the firearm he purchased from Defendant Ammo Box. Defendant Williams knowingly transferred the firearm to Defendant Groves. Defendant Williams knew or should have known that transferring this firearm to Defendant Groves posed a risk that this firearm would be possessed by persons prohibited from

possessing firearms and used in gun violence incidents.

170. Defendant Groves had possession and control of the firearm transferred to him by Defendant Williams. Defendant Groves knowingly transferred this firearm to other persons. Defendant Groves knew or should have known that transferring this firearm to other persons posed a risk that this firearm would be possessed by persons prohibited from possessing firearms and used in gun violence incidents.

171. The firearm negligently entrusted by Defendant Ammo Box to Defendant Williams and by Williams to Groves, and by Groves to other persons, was found at the crime scene of the Chiefs Rally shooting and recovered by Kansas City law enforcement agencies.

172. By transferring the firearm to Defendant Williams or his co-conspirator, Defendant Ammo Box proximately caused harm to Plaintiffs. By transferring the firearm to his co-conspirator, Defendant Williams proximately caused harm to the Plaintiffs. By transferring the firearm to individuals who were not permitted to possess the firearm, Defendant Groves proximately caused harm to the Plaintiffs.

173. The conduct of Defendant Ammo Box, Defendant Williams, and Defendant Groves showed a complete indifference to, and a conscious disregard for, the well-being of Plaintiffs, thereby justifying an award of punitive damages in this matter so as to punish Defendant Frontier Justice and deter others from like conduct in the future.

174. As a result of the conduct of Defendant Ammo Box, Defendant Williams, and Defendant Groves, Plaintiffs, suffered gunshot wounds as described further herein, leading to additional damages, including emotional harm, mental anguish, anxiety, stress, insomnia, and loss of enjoyment of life. Plaintiffs have suffered these injuries, continue to suffer them presently, and will continue to suffer them in the future.

175. By reason of the conduct of Defendant Ammo Box, Defendant Williams, and Defendant Groves set forth herein, Plaintiffs have paid, or become obligated to pay for, and will in the future pay or become obligated to pay for, items of expense in obtaining and receiving counseling, medical care, and treatment.

176. As a direct result of the conduct of Defendant Ammo Box, Defendant Williams, and Defendant Groves, Plaintiffs have suffered and in the future will continue to suffer an impaired and diminished capacity for work, labor, and pleasure.

177. Plaintiffs are entitled to recover damages in an amount to be determined at trial.

WHEREFORE, Plaintiffs pray for damages to compensate them for injuries and harms suffered, for prejudgment and post-judgment interest, punitive damages, costs, and all other relief the Court finds just and proper.

**COUNT VI - PREMISES LIABILITY**

*(against Premises Defendants and Event Planning Defendants)*

178. Plaintiffs repeat and reallege every allegation set forth in the preceding paragraphs.

179. At all relevant times, Premises Defendants and Event Planning Defendants and their agents owned, occupied, and/or controlled the premises of the subject area, including the Union Station lot and surrounding area where the Subject Incident occurred.

180. As an attendee of the Rally, Plaintiffs were invitees of Premises Defendants and Event Planning Defendants at all relevant times.

181. Premises Defendants and Event Planning Defendants assumed the duty to make the Subject Premises reasonably safe for lawful entrants such as Plaintiffs.

182. Premises Defendants and Event Planning Defendants owed a duty to its lawful entrants, including Plaintiffs, to exercise ordinary care to protect said entrants from foreseeable risks of harm.

183. Premises Defendants and Event Planning Defendants failed to exercise reasonable care to prevent injuries to invitees of the Rally, increasing the risk to Plaintiffs.

184. Premises Defendants and Event and Planning Defendants failed to use ordinary care in at least the following respects:

185. Failing to adequately plan the security for the Rally;

186. Failing to adequately stage/employ SWAT Trained Officers around the venue;

187. Failing to maintain an adequate memorandum of understanding for partnerships with law enforcement;

188. Failing to provide effective communication to the public regarding overall potential risks to attending;

189. Failing to engage a spectator management plan (e.g., a plan for issues ticketing the event and admittance, inspection, ushering, seating/standing, public announcements, etc.);

190. Failing to engage in crowd management/crowd control with mechanisms used to maintain order or reinstate order, such as limited access control, admission control, and sufficient monitoring and policing (including failing to monitor and diffuse crowd tension);

191. Failing to have and adequately broadcast a plan for evacuation and exit management and to engage in safe evacuation to lead spectators away from violence;

192. Failing to implement a "Clear Bag Policy";

193. Failing to implement a list of prohibited items;

194. Failing to implement one or more security checkpoints;

195. Failing to implement a system requiring a free ticket to gain entry;

196. Failing to set up adequate physical security barriers such as Jersey barriers and cement barriers; and

197. Failing to maintain reasonable security equipment like scanning technologies, such as magnetometers or x-ray machines.

198. As a direct and proximate result of the negligent acts and omissions by Premises Defendants and Event Planning Defendants, Plaintiffs suffered severe, permanent, and progressive personal injuries, including gun shot wounds and severe emotional trauma.

199. As a direct and proximate result of Premises Defendants' and Event Planning Defendants' misconduct, Plaintiffs have suffered and will continue to suffer damages including but not limited to:

- a. Past medical, rehabilitation, and life care costs;
- b. Future medical, rehabilitation, and life care costs;
- c. Past pain, suffering, loss of enjoyment of life, and emotional distress;
- d. Future pain, suffering, loss of enjoyment of life, and emotional distress;
- e. Loss wages; and
- f. Impaired earning capacity

WHEREFORE, Plaintiffs pray this Court enter judgment against Premises Defendants and Event Planning Defendants for a reasonable sum of damages in excess of twenty-five thousand dollars as will fairly and justly compensate Plaintiffs for their damages suffered, costs, interest, fees, and for such further relief as this Court deems proper.

### **COUNT VII – NEGLIGENCE**

***(against Defendants Miller, Mays, Young, Doe 1, Doe 2, and Doe 3)***

200. Plaintiffs repeat and reallege every allegation set forth in the preceding paragraphs.

201. Defendants Miller, Mays, and Young were negligent and failed to exercise ordinary care in each of the following ways, individually, alternatively, and/or in combination:

202. Bringing firearms to a crowded event at which they knew or should have known

hundreds of thousands of people would be in attendance;

203. Escalating a dispute that they knew or should have known to be likely to turn violent;

204. Failing to perform adequate firearm training to ensure proper usage of their firearms;

205. Failing to properly aim or control their weapons when returning fire.

206. As a result of the negligence of Defendants Miller, Mays, and Young, Plaintiffs, suffered gunshot wounds as described further herein, leading to additional damages, including emotional harm, mental anguish, anxiety, stress, insomnia, and loss of enjoyment of life. Plaintiffs have suffered these injuries, continue to suffer them presently, and will continue to suffer them in the future.

207. By reason of the conduct of Defendants Miller, Mays, and Young set forth herein, Plaintiffs have paid, or become obligated to pay for, and will in the future pay or become obligated to pay for, items of expense in obtaining and receiving counseling, medical care, and treatment.

208. As a direct result of the conduct of Defendants Miller, Mays, and Young, Plaintiffs have suffered and in the future will continue to suffer an impaired and diminished capacity for work, labor, and pleasure.

209. The conduct of Defendants Miller, Mays, and Young showed a complete indifference to, and a conscious disregard for, the well-being of Plaintiffs, thereby justifying an award of punitive damages in this matter so as to punish Defendants Miller, Mays, and Young and deter others from like conduct in the future.

WHEREFORE, Plaintiffs pray for damages to compensate them for injuries and harms suffered, for prejudgment and post-judgment interest, punitive damages, costs, and all other relief

the Court finds just and proper.

**COUNT VIII – NEGLIGENCE**

***(against Premises Defendants and Event Planning Defendants)***

210. Plaintiffs repeat and reallege every allegation set forth in the preceding paragraphs.

211. At the time and on the occasion in question, Premises and Event Planning Defendants owed Plaintiffs a legal duty to exercise ordinary care, meaning the degree of care that would be used by a reasonably prudent person under the same or similar circumstances. Premises and Event Planning Defendants breached this duty by various acts of commission and/or omission, including but not limited to, the following:

- a. Failing to provide a safe environment at the Rally;
- b. Failing to provide adequate security at the Rally;
- c. Failing to adequately hire security or safety personnel at the Rally;
- d. Failing to provide adequate security or safety equipment at the Rally;
- e. Failing to enact adequate security or safety policies and procedures at the Rally;
- f. Failing to assure the attendees of the event were not armed with firearms and/or any weapons;
- g. Failing to adequately hire medical personnel at the Rally;
- h. Failing to have and/or enforce rules related to crowd behavior/crowd control at the Rally;
- i. Failing to comply with applicable codes, regulations, and standards regarding safety at the Rally; and
- j. Other acts or omissions deemed negligent.

212. Such negligence individually and/or in the aggregate proximately caused Plaintiffs' injuries and resulting damages.

WHEREFORE, Plaintiffs pray for damages to compensate them for injuries and harms suffered, for prejudgment and post-judgment interest, punitive damages, costs, and all other relief the Court finds just and proper.

**COUNT IX – NEGLIGENCE**

*(against Defendant Ammo Box, Defendant R.K. Shows MO, Inc.,  
and Defendant Frontier Justice, LS LLC)*

213. Plaintiffs repeat and reallege every allegation set forth in the preceding paragraphs.

214. Defendant Ammo Box, R.K. Shows, and Frontier Justice have an obligation to exercise ordinary care in their actions so as to avoid causing harm to others.

215. Defendants Ammo Box, R.K. Shows, and Frontier Justice were negligent and failed to exercise ordinary care in each of the following ways, individually, alternatively, and/or in combination:

- a. Selling firearms to individuals who they knew or should have known to be straw purchasers;
- b. Making entries that they knew or should have known were false on Form 4473's;
- c. Providing a venue for obvious straw purchases; and
- d. Failing to exercise appropriate supervision and oversight over the sale of firearms that vendors sold and failing to audit the same.

216. As a result of the negligence of Defendants Ammo Box, R.K. Shows, and Frontier Justice, Plaintiffs, suffered gunshot wounds as described further herein, leading to additional damages, including emotional harm, mental anguish, anxiety, stress, insomnia, and loss of enjoyment of life. Plaintiffs have suffered these injuries, continue to suffer them presently, and will continue to suffer them in the future.

217. By reason of the conduct of Defendants Ammo Box, R.K. Shows, and Frontier Justice set forth herein, Plaintiffs have paid, or become obligated to pay for, and will in the future

pay or become obligated to pay for, items of expense in obtaining and receiving counseling, medical care, and treatment.

218. As a direct result of the conduct of Defendants Ammo Box, R.K. Shows, and Frontier Justice, Plaintiffs have suffered and in the future will continue to suffer an impaired and diminished capacity for work, labor, and pleasure.

219. The conduct of Defendants Ammo Box, R.K. Shows, and Frontier Justice showed a complete indifference to, and a conscious disregard for, the well-being of Plaintiffs, thereby justifying an award of punitive damages in this matter so as to punish Defendants Ammo Box, R.K. Shows, and Frontier Justice and deter others from like conduct in the future.

WHEREFORE, Plaintiffs pray for damages to compensate them for injuries and harms suffered, for prejudgment and post-judgment interest, punitive damages, costs, and all other relief the Court finds just and proper.

### **COUNT X – INJUNCTIVE RELIEF**

#### ***(against Premises Defendants and Event Planning Defendants)***

220. Plaintiffs repeat and reallege every allegation set forth in the preceding paragraphs.

221. This Court has authority to grant injunctive relief under RSMo. 526.010.

222. The Kansas City Chiefs have won three Super Bowls in the past five years (2020, 2023, and 2024). After each of these wins, Premises Defendants and Event Planning Defendants plan a parade and rally, including security, to celebrate the Super Bowl victory. However, each rally suffered from insufficient safety and security measures.

223. Given this consistency, it is more than likely that following another Super Bowl victory by the Kansas City Chiefs, a parade and rally will follow, and another rally is already planned for 2026, when Kansas City hosts FIFA World Cup Games. Considering the subpar track record of Premises Defendants and Event Planning Defendants concerning safety and security of

the previous rallies, there is a genuine threat and risk of additional injuries if the same safety and security measures remain. There are no damages that will completely compensate Plaintiffs for their injuries (both present and prospective).

224. Thus, pursuant to this Court's authority to issue injunctive relief, Plaintiffs seek an injunction requiring Premises Defendants and Event Planning Defendants to implement reasonable, industry-standard safety measures, including but not limited to:

- a. Engaging third-party security consultants, specializing in mass event security, to assist with the security and safety plan for future rallies;
- b. Providing effective communication to public before and during future rallies regarding overall potential risks to attending, evacuation/exit management plans, prohibited items list;
- c. Implementing a spectator management plan, including a system for ticketing an event (free or otherwise), establishing crowd management/crowd control with mechanisms used to maintain or reinstate order, and so on.
- d. Implementing a "Clear Bag Policy";
- e. Installing one or more security checkpoints;
- f. Erecting adequate physical security barriers such as Jersey barriers and cement barriers around the perimeter of future rallies; and
- g. Maintaining security equipment like scanning technologies, such as magnetometers or x-ray machines, to stop entry of prohibited items.

### **RELIEF**

As a result of the incident, Plaintiffs seek compensation for the following relief:

1. Past and future physical pain and suffering;
2. Past and future mental anguish;

3. Past and future medical expenses;
4. Punitive/exemplary damages;
5. Injunctive relief;
6. Court costs;
7. Pre- and post-judgment interest; and
8. Any and all other damages to which Plaintiffs may be justly entitled.

**JURY TRIAL DEMAND**

Plaintiffs hereby demand that this case be tried by jury.

DATED: June 2, 2025



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