

# EXHIBIT 1

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE PEOPLE OF THE STATE OF NEW YORK,  
by LETITIA JAMES, Attorney General of the  
State of New York,

Plaintiff,

Civ. No. 1:22-cv-6124-JMF

-against-

ARM OR ALLY, LLC; BLACKHAWK ,  
MANUFACTURING GROUP, INC., A/K/A 80  
PERCENT ARMS; SALVO TECHNOLOGIES,  
INC. A/K/A 80P BUILDER OR 80P FREEDOM  
CO.; BROWNELLS, INC., A/K/A BROWNELLS  
OR BOB BROWNELL'S; GS PERFORMANCE,  
LLC, A/K/A GLOCKSTORE OR GSPC; INDIE  
GUNS, LLC; KM TACTICAL; PRIMARY ARMS,  
LLC; RAINIER ARMS, LLC; AND ROCK SLIDE  
USA, LLC,

Defendants.

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**WAUGH'S DECLARATION IN SUPPORT OF MOTION  
TO WITHDRAW IN COMPLIANCE WITH LOCAL RULE 1.4**

I, CHRISTIAN W. WAUGH, hereby declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the following is true and correct:

1. I am counsel of record in this case for Defendant Indie Guns, LLC ("Indie Guns"), along with attorney Mary Norberg.
2. I submit this Declaration in support of my Motion to Withdraw as Counsel for Indie Guns at ECF 119.
3. Irreconcilable differences have arisen between myself and Indie Guns, the main difference being that Indie Guns failed to follow legal advice that I consider vital to its effective, professional, and ethical representation.

4. I am not asserting any retaining or charging lien of any kind.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 5, 2023  
Orlando, Florida

/s/ Christian W. Waugh  
Christian W. Waugh