

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**

TASER INTERNATIONAL, INC., n/k/a AXON  
ENTERPRISE, INC., a Delaware corporation,

Plaintiff - Judgment Creditor,

vs.

NO. 6:16-cv-00366-PGB-LRH

PHAZZER ELECTRONICS, INC.,  
a Delaware corporation,

Defendant - Judgment Debtor,

and

STEVEN ABBOUD, a Florida resident;  
PHAZZER GLOBAL LLC, a Nevis limited liability  
company; and  
PHAZZER IP, LLC, a Nebraska limited liability  
company,

Impleaded Defendants.

**JUDGMENT CREDITOR’S PROCEEDINGS SUPPLEMENTAL COMPLAINT**

Judgment Creditor TASER International, Inc. (“TASER”)<sup>1</sup> separately files this Proceeding Supplemental Complaint pursuant to the Court’s August 10, 2020 Order (Doc. 398) granting TASER’s October 21, 2019 Motion for Leave to implead third parties (Doc. 376). This Complaint is substantially the same as the proffered complaint at Doc. 376-1, but has been updated in minor respects due to the passage of time.

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<sup>1</sup> TASER changed its name to Axon Enterprise, Inc. effective April 5, 2017.

For its Proceedings Supplemental Complaint against Steven Abboud, Phazzer Global, LLC, and Phazzer IP, LLC, TASER alleges as follows:

### **PROCEDURAL HISTORY AND PARTIES**

1. TASER is a Delaware corporation with its principal place of business at 17800 N. 85th Street, Scottsdale, Arizona 85255. TASER filed the underlying action against Phazzer Electronics, Inc. (“Phazzer Electronics”) on March 2, 2016 (Doc. 1).

2. On July 21, 2017, due to Phazzer Electronics unrepentant bad faith litigation tactics, this Court granted TASER’s motion for default judgment, awarded damages, imposed sanctions, and entered a permanent injunction. (Doc. 183) (the “Injunction”). The Court’s Order was affirmed in its entirety on appeal by the Federal Circuit on October 26, 2018 and is now final. Only the Court’s accounting of damages remained.

3. On April 4, 2018, the Court entered its damages accounting order (Doc. 267), which was affirmed by the Federal Circuit on July 23, 2019. On May 11, 2018, this Court entered final judgment in favor of TASER and against Phazzer Electronics in the amount of \$7,869,578.74 (Doc. 273) (the “Judgment”). Phazzer did not appeal this Judgment or post any bond.

4. On August 1, 2018, the Court issued a Writ of Execution against Phazzer Electronics for the full Judgment amount of \$7,869,578.74. The writ remains unsatisfied.

5. Defendant and Judgment Debtor Phazzer Electronics is a Delaware corporation with its principal place of business at 339 Lancaster Drive, Davenport, Florida 33897. Until September 25, 2018, Phazzer Electronics was the *exclusive* licensee of PhaZZer® brand intellectual property in the United States.

6. Impleaded Defendant Steven Abboud (“Abboud”) is a Florida resident with an address of 339 Lancaster Drive, Davenport, Florida 33897 (the “Lancaster Property”). Abboud has managed and controlled Phazzer Electronics since its inception in 2009 and used it as his alter ego. Abboud was the “General” and chief operating officer running the day-to-day operations of Phazzer Electronics until at least August 21, 2017, when he purportedly resigned a month after the Injunction issued. Thereafter, Abboud has continued to serve as a “consultant” to Phazzer Electronics, actively involved in its management and control.

7. Upon information and belief, impleaded Defendant Phazzer Global, LLC<sup>2</sup> (“Phazzer Global”) is a Nevis limited liability company controlled by Abboud with its principal place of business at the Lancaster Property. Phazzer Global presently represents itself as the exclusive international licensee of PhaZZer® brand intellectual property.

8. Upon information and belief, impleaded Defendant Phazzer IP, LLC (“Phazzer IP”) is a Nebraska limited liability company with its principal place of business at the Lancaster Property. Under Abboud’s direction, Phazzer IP has now licensed PhaZZer® brand intellectual property to other Phazzer-related entities operating in the United States.

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<sup>2</sup> Phazzer Global’s website ([www.phazzerglobal.com](http://www.phazzerglobal.com)) refers to itself as “Phazzer Global, Inc.” and “Phazzer Global Corp.” However, TASER has been unable to find any such entity incorporated in the United States. Jason Abboud, Phazzer Global’s General Counsel and brother of Steven Abboud, has referred to the entity as an LLC created under the laws of Nevis.

## FACTUAL ALLEGATIONS

### **Abboud As Phazzer Electronics' True Owner—The Frenches as Pawns**

9. Misdirection is deeply embedded in the heart of the Phazzer legacy. Seeking to avoid division and distribution of his business as a marital asset in a divorce, or otherwise conceal assets/income from his ex-wife and the IRS, Abboud directed the formation of Phazzer Electronics in 2009 in the names of non-parties Kirk and Deirdra French.

10. Although Kirk and Deirdra (Abboud's first cousin) were designated as vice president and president/secretary respectively, Abboud was always the "intended owner" of Phazzer Electronics and has always acted as the owner of Phazzer Electronics.

11. Abboud was designated as Phazzer Electronics' "manager" in 2009. From the beginning, Abboud's control over the business was total; corporate documents grant the "manager" complete power, including command over corporate funds. Using his sole authority, Abboud has always directed Phazzer Electronics' business operations, including post-Injunction with the support of his live-in girlfriend Diana Robinson ("Robinson"). Robinson was a Phazzer Electronics employee from at least July 2014 through 2018.

12. Phazzer Electronics' accountant, Jeffrey Thacker, received information almost exclusively from Abboud.

13. In 2009, Abboud personally filed a trademark registration for the "Phazzer Logo," which he alleged he had been using since 2007, two years *before* the incorporation of Phazzer Electronics. Similarly, Abboud personally filed a trademark registration for the Phazzer name ("Phazzer Mark") in 2011.

14. Although not registered to do business in Florida, Phazzer Electronics' principal place of business was 808 N. Hoagland Boulevard, Kissimmee, Osceola County, Florida from 2013 through approximately October 1, 2017 when the office closed. Phazzer Electronics has operated out of Abboud and Robinson's residence at the Lancaster Property.

15. From Phazzer Electronics' inception, the Frenches have held only token roles in the business. They did not know who incorporated Phazzer Electronics, were not involved in its day-to-day operations, received no stock, salary or distributions, kept no corporate governance documents, and did not know if bylaws or articles of incorporation even exist.

16. As Phazzer Electronics' only designated officers, Deirdra and Kirk French never recall holding corporate meetings.

17. The Frenches do not know what annual business reports are or whether any such reports were ever filed in Delaware or Florida for Phazzer Electronics.

18. It was Abboud, not the Frenches, who determined what PhaZZer-brand products to sell and list for sale by Phazzer Electronics online, including after the Injunction.

19. Indeed, at his October 2018 deposition as Phazzer Electronics' designated corporate representative, Kirk French was unable to answer the most basic questions about the company's assets and operations, repeatedly referring TASER's counsel to Abboud as the best person to answer his questions.

**Utter Disregard of Corporate Form—Abboud’s Cash Cow**

20. In further disregard of corporate form, Phazzer Electronics has paid virtually all of Abboud’s personal bills, including insurance, car leases, residential utility bills, repairs to personal vehicles, payments to home improvement stores, and telephone bills.

21. Phazzer Electronics paid the credit card bills for Shining Star Investments, another of Abboud’s companies.

22. Abboud obtained personal loans from and made personal loans to Phazzer Electronics.

23. Phazzer Electronics funded mortgage payments, HOA dues, and related expenses for the Lancaster Property, purportedly purchased as an “investment” by the Frenches. In April 2017, during the underlying litigation, the Frenches sold the Lancaster Property to Abboud for less than the amount the Frenches paid for the property using Phazzer Electronics’ assets. Upon information and belief, Abboud and Robinson now live in and operate related Phazzer entities out of that location.

24. Phazzer Electronics purchased two different Mercedes Benz vehicles for Abboud’s personal use, including one worth over \$100,000. There was no legitimate business purpose for Abboud to have a company vehicle while he was purportedly in charge of international sales for Phazzer Electronics. Upon information and belief, one or both of these vehicles was transferred to Abboud personally.

25. Phazzer Electronics purchased a Toyota pick-up truck for Robinson. Upon information and belief, this vehicle was transferred to Robinson personally.

26. Phazzer Electronics routinely paid relatives of Deirdra French and/or Abboud for unknown purposes.

27. On or about April 21, 2017, Abboud directed payment of \$100,000 from Phazzer Electronics to Double Dragon, a Taiwan-based company with ties to Abboud.

28. To continue siphoning funds from Phazzer Electronics, increase TASER's costs, and prevent collection of the Judgment, Abboud has directed the obstruction of these proceedings since the outset. Abboud's efforts have only intensified post-Judgment. Examples include:

- a. Disregarding Court Orders, violating the Injunction, and failing to personally appear at his own contempt hearing;
- b. Directing Phazzer Electronics' agents and employees not to participate in discovery, thereby forcing TASER to seek third-party discovery to obtain evidence of Phazzer Electronics' infringing sales;
- c. Designating Kirk French as corporate representative for post-judgment deposition, who helplessly admitted he "probably is not the best person" to give testimony about Phazzer Electronics' assets and operations;
- d. Failing to produce at Kirk French's deposition documents responsive to TASER's subpoena requests;
- e. Draining Phazzer Electronics' accounts by using corporate funds to pay mortgage payments and other expenses for the Lancaster Property (where Abboud resided);
- f. Spending Phazzer Electronics' money on personal excesses such as the \$100,000+ Mercedes Benz;

- g. Fabricating the narrative that the commercial landlord at the 808 N. Hoagland Boulevard, Kissimmee address destroyed or seized Phazzer Electronics' corporate records;
- h. Claiming ignorance of the whereabouts of Phazzer Electronics' inventory and records as a result of the landlord's purported eviction;
- i. Filing misleading and duplicative motions in coordination with Robinson to raise irrelevant issues and stall collection;
- j. Conspiring with Robinson not to appear for her July 1, 2019 deposition and to file a frivolous Federal Circuit appeal; and
- k. Repeatedly challenging without standing the Judgment, the Injunction, and the underlying intellectual property in the face of the Federal Circuit's final, unambiguous October 26, 2018 judgment affirming the foregoing in their entirety.

**Abboud's Fraudulent Transfer of Phazzer Electronics' Business and Assets to Phazzer Global and Phazzer IP**

29. Phazzer Global and Phazzer IP operate under the direction and control of Abboud in substantially the same manner, using substantially the same methods, and in substantially the same location as Abboud operated Phazzer Electronics before gutting the business to avoid the underlying Injunction and Judgment.

30. Abboud registered the domain name [www.phazzer.com](http://www.phazzer.com) in his own name and associated with the entity Leonidas IP, LLC ("Leonidas IP") in 2008, prior to the formation of Phazzer Electronics. In the registration, Abboud provided a phone number with a Nebraska area code, but the street address was falsified, incomplete, and referred to



the city of Charleston in Saint Kitts and Nevis. At least as of October 2019, Abboud listed his email address as [controller@phazzer.com](mailto:controller@phazzer.com), and Phazzer Electronics used the [www.phazzer.com](http://www.phazzer.com) website to market the infringing products at all times relevant to the underlying litigation.

31. Abboud registered the domain name [www.phazzerstore.com](http://www.phazzerstore.com) in his own name in 2012. At least as of October 2019, as registrant, Abboud listed his location at the Lancaster Property with the email address [controller@phazzer.com](mailto:controller@phazzer.com). Via [www.phazzerstore.com](http://www.phazzerstore.com), Phazzer Electronics sold the infringing products at issue in the underlying litigation.

#### **Phazzer IP, LLC**

32. Abboud formed Phazzer IP in 2013.

33. Upon information and belief, Phazzer IP operated out the same office space as Phazzer Electronics at 808 N. Hoagland Boulevard, Kissimmee, Florida until that office closed in or about October 2017.

34. Abboud executed assignments of the Phazzer Logo and the Phazzer Mark from himself to Phazzer IP on or about April 16, 2014.

35. At all times relevant to the underlying litigation, Phazzer Electronics was Phazzer IP's exclusive intellectual property licensee in the United States.

36. By May 2017, Phazzer Electronics purportedly owed over \$250,000 in licensing fees to Phazzer IP. Under its licensing agreement with Phazzer IP, monthly administrative fees were due immediately but were never deferred or paid. The licensing agreement also required monthly royalties fees which were deferred until January 1, 2014.

Despite earning net profits in years prior and subsequent to 2014, Phazzer Electronics never paid any of the \$250,000 it owed Phazzer IP.

37. On or about June 23, 2017, on the heels of Phazzer Electronics and its representatives' non-appearance at court-ordered depositions and court proceedings, and following its counsel's request for a "controlled default," Abboud directed the transfer of \$17,506.31 from Phazzer Electronics to Phazzer IP.

38. Within days of the July 21, 2017 default and Injunction, on or about July 28, 2017, Robinson, on behalf of Phazzer IP, assigned the Phazzer Logo and Phazzer Mark to Leonidas IP, which, upon information and belief, is a Nevis limited liability company owned by Abboud.

39. Although Phazzer IP purportedly assigned its entire interest in and to the Phazzer Logo and the Phazzer Mark to Leonidas IP, subsequent and ongoing representations appear on Phazzer websites and press releases that Phazzer IP "is the exclusive licensee of all PhaZZer® brand intellectual property in the United States."

40. Robinson, on behalf of Phazzer IP, purportedly terminated Phazzer Electronics' exclusive licensing agreement on or about September 25, 2018.

41. On or about October 10, 2018, Phazzer IP also purportedly granted licenses to several new U.S. suppliers to sell products "under the PhaZZer® brand," including Phazzer-USA, LLC, Phazzer Holdings, Inc., Phazzer Federal Supply, and Less Lethal Safety Supply, Inc.

**Phazzer Global LLC**

42. Upon information and belief, Abboud formed Phazzer Global in 2015 and has always been its “Managing Director.” All powers to control the company were designated to Abboud.

43. Abboud registered the domain name [www.phazzerglobal.com](http://www.phazzerglobal.com) in his own name and in association with the entity Leonidas IP in 2015. Like the domain registration for [www.phazzer.com](http://www.phazzer.com) and [www.phazzerstore.com](http://www.phazzerstore.com), the address was falsified, incomplete, and listed the city of Charleston in Saint Kitts and Nevis. At least as of October 2019, the registrant email was [controller@phazzer.com](mailto:controller@phazzer.com), the same registrant email used for [www.phazzer.com](http://www.phazzer.com) and [www.phazzerstore.com](http://www.phazzerstore.com).

44. Upon information and belief, Phazzer Global shared the same office space with Phazzer IP and Phazzer Electronics in Kissimmee, Florida, where Phazzer Electronics kept its product inventory.

45. Upon information and belief, substantially all of Phazzer Electronics’ inventory was transferred to Phazzer Global to avoid the Judgment and Injunction. Phazzer Electronics has claimed it no longer possesses inventory as a result of an alleged eviction, but no such eviction occurred and inventory that predates the judgment has been sold in the U.S. recently.

46. In further efforts to avoid the Judgment and Injunction, Abboud directed that Phazzer Electronics’ purchase orders, funds, and business opportunities be re-routed to Phazzer Global. This included, without limitation, redirection of a \$131,573 wire transfer from Kambio Corporation. In or about July 2017, Abboud further directed transfer of Phazzer Electronics’ inventory to Kambio Corporation’s Miami, Florida warehouse.

47. The co-mingling of the two companies' business is undeniable. At least as of October 2019, Phazzer Global's sales terms and conditions<sup>3</sup> directed users to contact [sales@phazzer.com](mailto:sales@phazzer.com) about receipt of marketing emails. Those seeking to register as a drop ship affiliate on [www.phazzerglobal.com](http://www.phazzerglobal.com) are also directed to [sales@phazzer.com](mailto:sales@phazzer.com).<sup>4</sup> Those inquiring about CEW Operator Training sold on [www.phazzerglobal.com](http://www.phazzerglobal.com) are directed to the email [training@phazzer.com](mailto:training@phazzer.com). Phazzer Global sells large banners featuring the Phazzer Logo and the Phazzer website ([www.phazzer.com](http://www.phazzer.com)), and instructs that further requests be directed to [sales@phazzer.com](mailto:sales@phazzer.com).<sup>5</sup> User manuals on Phazzer Global's website prominently refer to Phazzer Electronics.<sup>6</sup>

48. Phazzer Global's homepage at [www.phazzerlglobal.com](http://www.phazzerlglobal.com) leads with misleading banner headlines about Phazzer Electronics' reexamination challenge to TASER's '262 Patent, and provides links to numerous outdated USPTO and appellate filings in this case, giving the false impression that appeals and injunction stay requests are still pending rather than being resolved against Phazzer Electronics long ago.

49. Phazzer Global uses and offers products bearing the Phazzer Mark. The Phazzer Global website also uses content identical or nearly identical to Phazzer Electronics' websites operating at all times relevant to the underlying litigation.

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<sup>3</sup> [https://phazzerglobal.com/Terms-and-Conditions\\_ep\\_2-1.html](https://phazzerglobal.com/Terms-and-Conditions_ep_2-1.html)

<sup>4</sup> <https://phazzerglobal.com/register.asp?cg=15>

<sup>5</sup> [https://phazzerglobal.com/PhaZZer-Banner--Pull-Down--Enforcer\\_p\\_286.html](https://phazzerglobal.com/PhaZZer-Banner--Pull-Down--Enforcer_p_286.html)

<sup>6</sup> <https://www.phazzerglobal.com/assets/images/Manuals/Phazzer%20Enforcer%20Handbook%20v.7.2015.24.6.pdf>

50. Phazzer Global's online product warranty states that the "limited warranty set forth below is provided by Phazzer Electronics, Inc. USA with respect to ALL PhaZZer Brand Products purchased."<sup>7</sup>

51. All conditions precedent to TASER's right of action against Abboud, Phazzer Global, Phazzer IP, have occurred, have been performed, or otherwise have been excused.

52. TASER retained undersigned counsel and is obligated to pay its attorneys a reasonable fee for services rendered. TASER is entitled to an award of attorneys' fees pursuant to Florida Statute § 56.29(8).

**COUNT ONE**  
**Veil Piercing/Alter Ego Liability Against Abboud**

53. TASER restates and incorporates by reference the allegations of ¶¶ 1-52 above, as if fully set forth herein.

54. Phazzer Electronics was incorporated to perpetuate a fraud on and avoid creditors, including at least Abboud's ex-wife and taxing authorities. Abboud designated his first cousin Deirdra French and her husband Kirk French as fictitious owners and officers of the business to conceal his own control, assets, and ownership interests in the company.

55. At all times material hereto, Abboud was the intended owner of Phazzer Electronics, who acted as the owner and directed fraudulent transfers made by Phazzer Electronics, as well as the acts that resulted in the Injunction and Judgment.

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<https://phazzerglobal.com/assets/images/PHAZZER%20CUSTOMER%20WARRANTY%20INFORMATION%20TEMPLATE.pdf>

56. Abboud routinely exploited Phazzer Electronics' assets for his own use, eliminating the distinction between corporate and personal affairs. Phazzer Electronics has enjoyed no independent existence and has merely been an instrumentality leveraged to fund nearly all of Abboud's personal living expenses tax free.

57. At all times material hereto, Phazzer Electronics did not maintain corporate formalities. It did not register to do business in Florida, has not maintained a corporate book, has not called annual meetings of its principals customary to business entities, has issued no stock, and has filed no annual business reports. Upon information and belief, Phazzer Electronics has not filed tax returns since 2015 without explanation or extension, further evidencing a failure to maintain corporate formalities.

58. At all times material hereto, Abboud has simultaneously managed and controlled Phazzer Electronics, Phazzer IP, and Phazzer Global, transferring assets and IP rights between them at his whim to dodge whatever legal challenge was currently before him.

59. Both in anticipation of and after entry of the Judgment, Abboud orchestrated numerous transfers of Phazzer Electronics' assets and IP rights to other Phazzer-related entities within his control, thereby preventing TASER from satisfying the Judgment to its further detriment.

60. Given the initial improper purpose surrounding its incorporation, the absence of corporate formalities, the abuse of corporate form, and siphoning of business assets to fund Abboud's personal desires, the corporate veil of Phazzer Electronics should be pierced. The Judgment against Phazzer Electronics should be attributable to and collectible from Abboud.

**COUNT TWO**

**Phazzer Global as Mere Continuation of Phazzer Electronics**

61. TASER restates and incorporates by reference the allegations of ¶¶ 1-52 above, as if fully set forth herein.

62. Phazzer Global is a mere continuation of Phazzer Electronics, sharing the same management (Abboud), personnel (Abboud and Robinson), location (Lancaster Property), inventory (products subject to the Injunction), intellectual property (products sold under the PhaZZer® brand), and the same domain registration contact information ([controller@phazzer.com](mailto:controller@phazzer.com) and the incomplete Nevis address).

63. Prior to the formation of Phazzer Global, Phazzer Electronics had customers located in and product shipped to Brazil, South Africa, and other international destinations. Abboud also represented himself as head of “International Sales and Product Development” for Phazzer Electronics.

64. Upon information and belief, by at least June 2017—with the looming threat of an injunction—Abboud directed his IT coordinator to divert Phazzer Electronics’ online international sales from phazzer.com to phazzerglobal.com.

65. The cessation of Phazzer Electronics’ operations and transfers of its business and assets to Phazzer Global were and are fraudulent efforts to avoid the liabilities of Phazzer Electronics while continuing the business of Phazzer Electronics.

66. Due to these fraudulent and improper transfers by Abboud on behalf of Phazzer Electronics, TASER has been harmed and unable to satisfy the Judgment.

**COUNT THREE**

**Fraudulent Transfers to Phazzer IP and Phazzer Global  
in Violation of Fla. Stat. §§ 726.105(1)(a) and 726.106**

67. TASER restates and incorporates by reference the allegations of ¶¶ 1-52 above, as if fully set forth herein.

68. As a result of the Judgment, Phazzer Electronics is indebted to TASER and this indebtedness predates the transfer of certain assets and business opportunities from Phazzer Electronics.

69. Phazzer Electronics, through at least Abboud and Robinson, transferred or diverted payments, assets, property, and accounts receivable from Phazzer Electronics to at least Phazzer Global and Phazzer IP, receiving less than the reasonable equivalent valuable of the property in return.

70. In anticipation of this Court's default and Judgment, and in an effort to avoid collection of it, on or about June 23, 2017 Phazzer Electronics transferred in excess of \$17,500 to Phazzer IP.

71. On or about July 28, 2017, only a week after this Court's entry of the Injunction and default, Abboud and Robinson transferred IP rights associated with Phazzer Electronics, including at least the Phazzer Mark and Phazzer Logo, from Phazzer IP to Leonidas IP.

72. Upon information and belief, in close proximity to entry of the Injunction and default against Phazzer Electronics, Abboud transferred substantially all of Phazzer Electronics' inventory and purchase orders to Phazzer Global.



73. Abboud is an insider of Phazzer Electronics, Phazzer Global and Phazzer IP. Abboud operates Phazzer Electronics as his alter ego and, upon information and belief, owns and/or controls Phazzer Global and Phazzer IP.

74. Abboud used and enabled Phazzer Global and Phazzer IP to exploit Phazzer Electronics' assets to avoid collection of the Judgment.

75. Numerous badges of fraud are present:

- a. The transfers were made to and by insiders.
- b. Abboud, by virtue of his control of Phazzer Electronics, maintained possession or control of the transferred property.
- c. The transfers were concealed.
- d. Before the transfers were made, Phazzer Electronics had been sued and defaulted.
- e. The transfers were of substantially all of Phazzer Electronics inventory or assets and rendered Phazzer Electronics insolvent.
- f. Phazzer Electronics, through at least Abboud and Robinson, concealed assets.
- g. The transfers occurred shortly before and shortly after Phazzer Electronics incurred a substantial debt.

76. Phazzer Electronics' transfer of business and assets to Phazzer Global and Phazzer IP constitutes a fraudulent transfer pursuant to Fla. Stat. §§ 726.105 and 726.106, as the transfers were made with either actual intent to hinder, delay or defraud TASER and its collection of the Judgment or, alternatively, were constructively fraudulent.

77. Phazzer Electronics received no consideration or any reasonably equivalent value in exchange for the transfers to Abboud, Phazzer Global, and Phazzer IP of the entirety of Phazzer Electronics' assets and business opportunities.

78. As a result, TASER has incurred damages by way of an inability to collect the Judgment owed by Phazzer Electronics due to the artificial insolvency caused by the fraudulent transfer of assets from Phazzer Electronics.

### **RELIEF REQUESTED**

TASER respectfully requests that the Court enter judgment in its favor and against the Impleaded Defendants as follows:

- A. For a finding that Phazzer Electronics is the alter ego of Abboud such that the corporate veil is pierced and liability flows personally to Abboud;
- B. For an Order directing Abboud to account for all Phazzer Electronics inventory and assets from the date of the filing of the underlying action;
- C. For a finding that Phazzer Global is a mere continuation of Phazzer Electronics such that it is liable for the debts of Phazzer Electronics;
- D. For entry of judgment, jointly and severally, against Abboud for the full amount of the Phazzer Electronics' Judgment entered in favor of TASER;
- E. For judgment against the Impleaded Defendants in accordance with Fla. Stat. § 726.108 for damages, avoidance of fraudulent transfers, and execution on any and all assets transferred from Phazzer Electronics and any proceeds derived therefrom, in an amount to be proven at trial;
- F. For the levy of Phazzer Electronics' and Impleaded Defendants' property pursuant to Fla. Stat. § 56.29(6);

- G. For attorneys' fees, costs, and post-judgment interest pursuant to applicable law, including, without limitation, Fla. Stat. § 56.29(8); and
- H. For such other and further relief as the Court deems just and proper.

Respectfully submitted August 24, 2020:

/s/Pam Petersen

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 24, 2020, I electronically filed the foregoing using the Management/Electronic Case Filing (“CM/ECF”) system, which will send a Notice of Electronic Filing to the following CM/ECF participants:

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