



MATTHEW P. DENN
ATTORNEY GENERAL

DEPARTMENT OF JUSTICE
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July 30, 2018

Defense Distributed
2320 Donley Dr., Suite C
Austin, TX 78758
crw@defdist.org

To Whom It May Concern:

You are hereby directed to cease and desist from publishing printable gun computer files for use by Delaware residents. The State of Delaware Department of Justice will take legal action to prevent any effort by Defense Distributed intended to publish or offer individuals – including criminals – programs, codes, drawings, or other sources of data that an individual can use to create untraceable firearms. Any such action constitutes a threat to public safety and a likely violation of our criminal law. Any action to disseminate this information constitutes a violation of the State of Delaware's nuisance and negligence laws. If you do not immediately halt your efforts to distribute this information, by whatever electronic form and by whatever electronic means, Delaware DOJ will bring legal action against your company.

Because the printed guns would not have serial numbers, they will permit the untraceable use of firearms and prevent effective law enforcement. Due to the nature of your intended distribution of this data, everyone – regardless of age, criminal status, or mental health history – will be able to own a firearm. Your action would seriously undermine the safety of our residents. *See 11 Del. C. §1448.*

A person who engages in conduct that is unlawful or unreasonable under the circumstances and who knowingly or recklessly creates or maintains a condition that endangers the health or safety of others, is guilty of Criminal Nuisance. *11 Del.C. §1322(1). See also, e.g. 11 Del.C. §§ 1444 and 1447.* Your public comments and deliberate indifference to the safety of citizens in Delaware is disturbing. Your public comments and statements are evidence of the reckless nature of your intended actions and will be considered in a civil enforcement action.

Delaware DOJ demands that you halt publication of the printable-gun computer files in the State of Delaware immediately. Should you fail to comply with this letter, our office will initiate legal action barring you from publishing these files and seeking costs and attorney fees in order to make the public whole.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Denn", with a long horizontal flourish extending to the right.

Matthew Denn
Delaware Attorney General