

## 1 Declaration of Dimitrios Karras, CEO Ares Armor

2 In regards to the events surrounding Ares Armor's interaction with EP Armory's products and the threats made  
3 towards Ares Armor by the Bureau of Alcohol, Tobacco, Firearms, and Explosives (BATFE.) The following  
4 declarations are true and correct to the best of my knowledge.

5 I, Dimitrios Karras, state:

6 1. During a meeting with the BATFE around the end of 2012 that was unrelated to EP Armory's product, the Agent  
7 that was present very strongly requested that I turn over Ares Armor's customer list. He intimidated me with the  
8 possibility of criminal charges if he was not satisfied. This was the first attempt the BATFE made to intimidate Ares  
9 Armor into turning over private customer information.

10 2. An 80% lower is an industry term for an unfinished receiver that is not considered to be a firearm.

11 3. EP Armory manufactures an 80% lower receiver made from polymer.

12 4. Ares Armor purchases and then resells many products one of which is the 80% Polymer Lowers that are made by  
13 EP Armory.

14 5. In the regular course of business I have seen many different 80% AR-15 receivers.

15 6. EP Armory's product is no different than standard 80% receivers that are sold openly and that the BATFE has  
16 consistently determined to not be a firearm. EP Armory's product is in compliance with previous BATFE  
17 Determinations and is not a firearm.

18 7. The BATFE has Raided EP Armory based on incorrect information about EP Armory's manufacturing process.

19 The determination letter written by the BATFE incorrectly classified the EP Armory product as a firearm based on  
20 faulty information. The BATFE was under the impression that EP Armory was making a firearm and then  
21 reverting back to the 80% stage by filling in the fire-control cavity. At no point during the manufacturing process by  
22 EP Armory is a weapon made and then reverted. The solid fire-control cavity is built first and the rest of the 80%  
23 casting is made around this "core" specifically so that their product at no time could be considered to be a firearm.

24 a. As can be seen in Exhibit 1-3. The BATFE has consistently determined that the machining operations  
25 that cannot be performed in order to not be considered a firearm are as follows:

26 1. Milling out of fire-control cavity.

27 2. Selector-lever hole drilled.

28 DECLARATION OF DIMITRIOS KARRIS PI - I

1           3. Cutting of trigger slot.

2           4. Drilling of trigger pin hole.

3           5. Drilling of hammer pin hole.

4           b. EP Armory's product is consistent with the BATFE's many previous determinations

5           c. At no time during EP Armory's manufacturing process are any of the aforementioned 5 operations in a  
6 state that could cause a reasonable person to believe that EP Armory's product would be considered a firearm.

7           8. The BATFE has been appropriately informed of their mistake. However, even though they have no determination  
8 that is based on fact, they are knowingly using their fiction based determination to intimidate Ares Armor with  
9 threats in order to inappropriately gain access to information that is private and should be protected.

10          9. I received communication on or about 3/10/2014 from our legal counsel (Jason Davis) that the BATFE was in the  
11 process of obtaining a warrant against Ares Armor based on their incorrect determination of EP Armory's Product. I  
12 was advised that the BATFE had offered to forego obtaining a warrant if Ares Armor was willing to:

13           a. Hand over all of EP Armory's 80% Lowers

14           b. Turn over Ares Armor customer's private information to the BATFE.

15          In exchange for turning over our customer's private information the BATFE said that they would not "raid" Ares  
16 Armor's facilities and would not pursue "criminal" charges. This made me feel as if I was being extorted. I agreed  
17 to their terms in order to delay an impending and unjust raid against Ares Armor long enough to obtain legal  
18 protection under the law.

19          10. I have been unjustly threatened with raids and criminal charges in an attempt by the BATFE to obtain  
20 information that is private and protected. The BATFE has expressed interest in obtaining Ares Armor's customer list  
21 in the past and is now attempting to strong-arm us with undue threats based on information they know to be  
22 incorrect.

23          11. I am now in constant fear for the safety of my employees, my customers and myself.

25          Executed March, 10, 2014 Oceanside, CA

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

28          DECLARATION OF DIMITRIOS KARRIS PI - 2



*Exhibit I*

U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

---

*Martinsburg, WV 25405*

[www.atf.gov](http://www.atf.gov)

903050:WJS  
3311/300833

July 15, 2013

Mr. Tilden Smith  
80 Percent Arms  
202 East Alton Avenue  
Suite A  
Santa Ana, CA 92707

Dear Mr. Smith,

This is in reference to your correspondence, with enclosed samples, to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch (FTB). In your letter, you asked for a classification of the partially completed AR-type receivers your company is planning to manufacture (see enclosed photos). Specifically, you want to know if the three submitted items, identified as samples 1, 2, and 3 (and reviewed below) would be classified as "firearms" under the Gun Control Act of 1968 (GCA).

**SAMPLE #1**

During the examination of this sample, FTB found that the following machining/drilling operations had been performed:

1. Front and rear assembly/pivot pin holes drilled.
2. Front and rear assembly/pivot-detent pin holes drilled.
3. Magazine-release and catch slots cut.
4. Rear of receiver drilled and threaded to accept buffer tube.
5. Buffer-retainer hole drilled.
6. Pistol-grip mounting area faced off and threaded.
7. Magazine well completed.
8. Trigger guard machined.
9. Receiver end-plate area machined.
10. Pistol-grip mounting area threaded.
11. Selector-lever detent hole drilled.

Mr. Tilden Smith

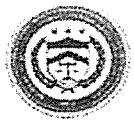
Page 2

The machining operations not yet performed are as follows:

1. Milling out of fire-control cavity.
2. Selector-lever hole drilled.
3. Cutting of trigger slot.
4. Drilling of trigger pin hole.
5. Drilling of hammer pin hole.

The FTB examination of your submitted casting found that SAMPLE #1 is not sufficiently complete to be classified as the frame or receiver of a firearm and thus would not be a "firearm" as defined in the GCA.

U.S. Department of Justice



*Exhibit 2*

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Martinsburg, WV 25405

[www.atf.gov](http://www.atf.gov)

903050: WJS  
3311 300627

May 17, 2013

Mr. Doug Hughes  
Operations Manager  
Kenney Enterprises, Inc  
4343 East Magnolia Street  
Phoenix, AZ 85034

Dear Mr. Hughes,

This is in reference to your correspondence, with enclosed sample, to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch (FTB). In your letter, you asked for a classification of the submitted, partially completed AR-type receiver your company is planning to manufacture. Specifically, you wish to know if this item would be classified as a "firearm" under the Gun Control Act of 1968 (GCA).

During the examination of your sample, FTB found that the following machining/drilling operations performed on the submitted sample:

1. Front and rear assembly/pivot pin holes drilled.
2. Front and rear assembly/pivot detent pin holes drilled.
3. Selector-retainer hole drilled.
4. Magazine release and catch slots cut.
5. Trigger-guard holes drilled.
6. Rear of receiver drilled and threaded to accept buffer tube.
7. Buffer-retainer hole drilled.
8. Pistol-grip mounting area faced off, drilled, and threaded.
9. Magazine well completed.

The machining operations not yet performed are as follows:

1. Milling out of fire-control cavity.
2. Drilling of selector-lever hole.

*Exhibit 2 Continued*  
Page 2

3. Cutting of trigger slot.
4. Drilling of trigger pin hole.
5. Drilling of hammer pin hole.

The FTB examination of your submitted casting and diagrams found that your submitted item will not be sufficiently complete to be classified as the frame or receiver of a firearm and thus would not be a "firearm" as defined in the GCA.

In closing, we should point out that the information found in correspondence from our Branch is intended only for use by the addressed individual or company with regard to a specific scenario described within that correspondence.

To facilitate return of your sample, please provide FTB with the appropriate FedEx account information within 60 days of receipt of this letter.

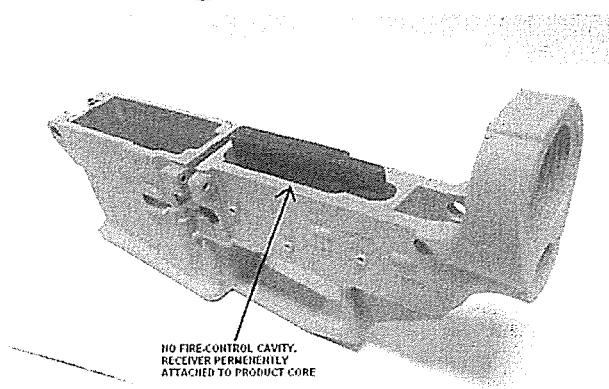
We thank you for your inquiry and trust the foregoing has been responsive to your evaluation request. Please do not hesitate to contact us if additional information is needed.

Sincerely yours,

  
Earl Griffith

Chief, Firearms Technology Branch

Exhibit 3



ARE PHOTOGRAPHS  
OF A EP ARMORY  
Polymer 80% Lower  
Receiver.

Exhibit 4

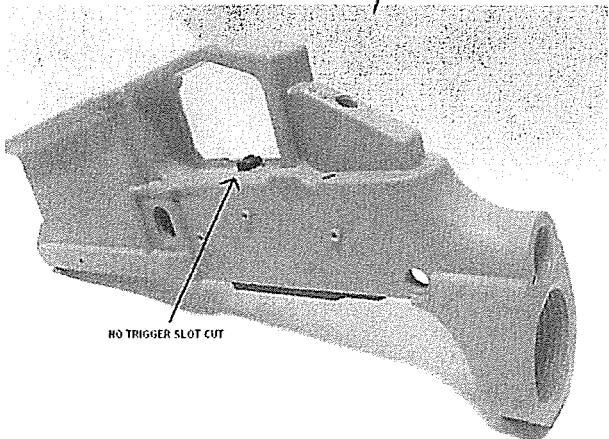


Exhibit 5

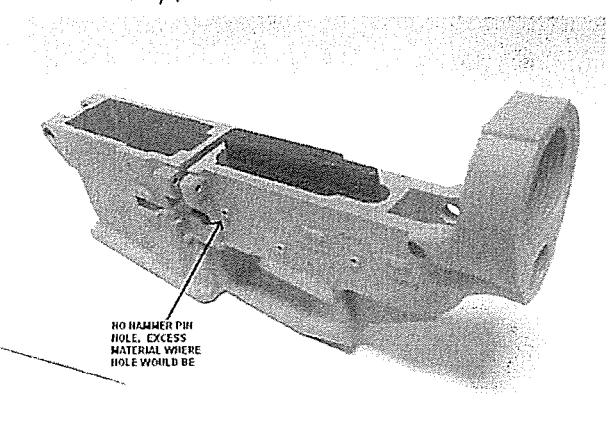


Exhibit 6

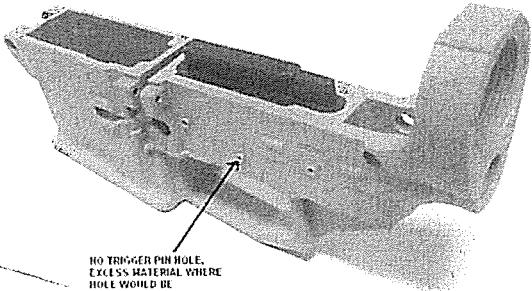


Exhibit 7

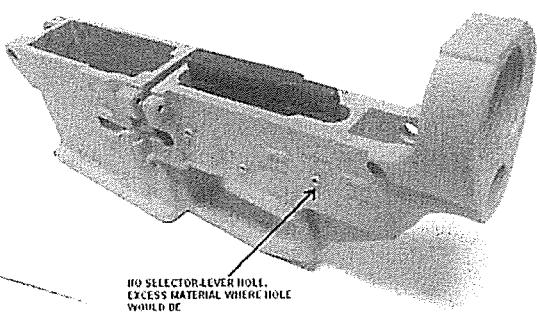
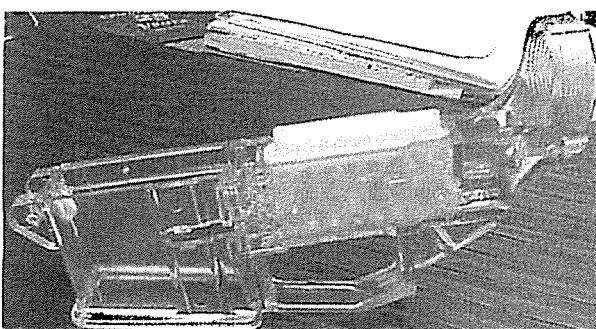
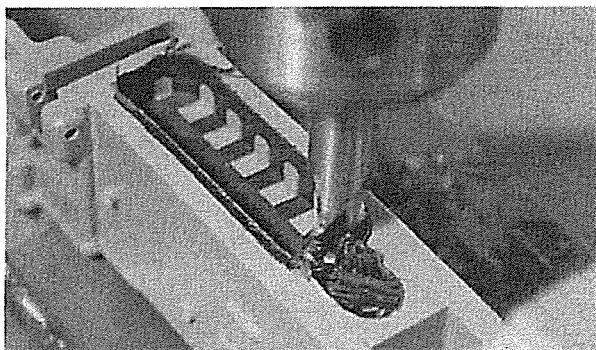


Exhibit 8



→ Actual EP ARMORY  
80% lower  
receivers



< Exhibit 9

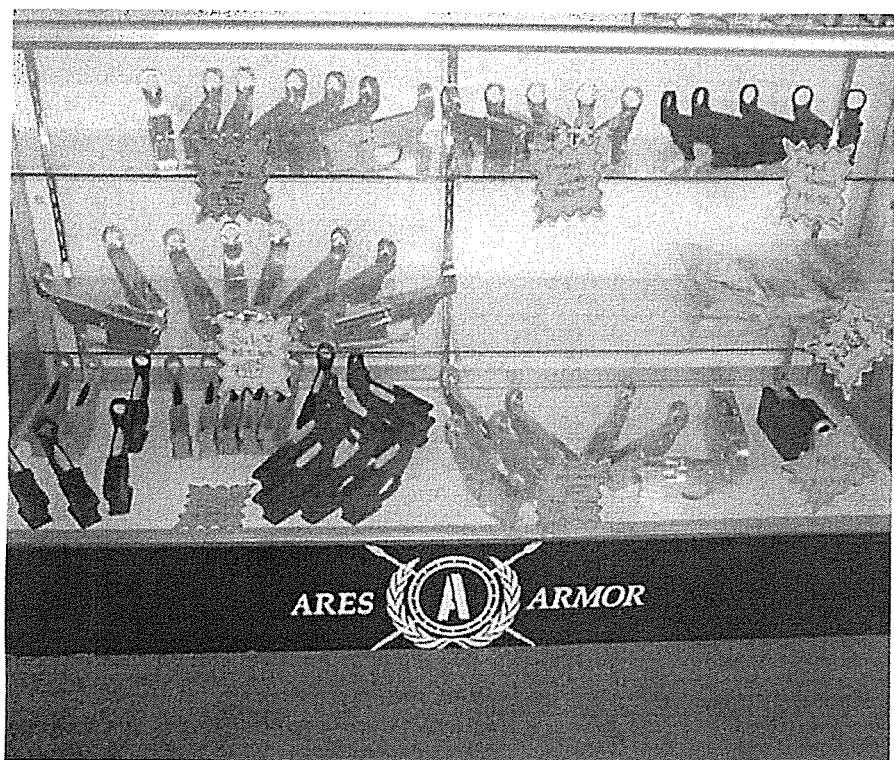


Exhibit 10