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August 29, 2018

VIA E-MAIL ONLY

Brandon Combs
Firearms Policy Coalition
policy@fpchq.org

Re: Your Public Records Request

Dear Mr. Combs:

I write in response to your two (2) public records requests received on August 8 and August 13, 2018,¹ and made pursuant to the Massachusetts public records law, G.L. c. 66, § 10. In e-mails sent to our Records Access Officer on August 7 and August 10,² you requested copies of records held by the Office of the Attorney General (AGO), specifically as follows:

Request 1

1) For the period of July 30, 2018, to the present, records and information containing or about any of the following terms: CodelsFreeSpeech.com; Firearms Policy Coalition; FPC; Firearms Policy Foundation; FPF; The Calguns Foundation; CGF; California Association of Federal Firearms Licensees; CAL-FFL; Brandon Combs; Gene Hoffman.

2) For the period of July 30, 2018, to the present, records and information that are or refer to communications with Amazon AWS or Amazon Web Services (including but not limited to communications to or from ec2-abuse@amazon.com) about CodelsFreeSpeech.com, the term "Liberator", or the term "liberator_complete.zip".

Request 2

1) For the period of July 30, 2018, to the present, all records and information containing or about any of the following terms: Defense Distributed; ghostgunner.net; Shopify; Ghost Gunner; Ghost Gunner 2; CNC; 80% lower.

¹ See 950 CMR 32.03(3).

² We note that you also sent copies of these requests via overnight mail.



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Please be advised that the AGO is currently involved in litigation and one or more investigations concerning "3D-printed guns." The disclosure of any records related to these ongoing matters that have been and continue to be compiled by this Office would divulge our litigation, pre-litigation, and investigative strategies and reveal our sources of information such that our legal and enforcement positions would be compromised. Records responsive to your requests are therefore exempt from disclosure under the deliberative process and investigative exemptions to the public records law, G.L. c. 4, § 7, cl. 26(d)³ and (f). We cannot provide any more specificity about the requested records without disclosing these AGO legal and investigative strategies.

You have the right to appeal this response to the Supervisor of Records pursuant to G.L. c. 66, § 10A(a), and to seek judicial review of an unfavorable decision by commencing a civil action in the superior court under G.L. c. 66, § 10A(c).

Very truly yours,



Lorraine A.G. Tarrow
Assistant Attorney General & Records Access Officer
General Counsel's Office

³ See also DaRosa v. City of New Bedford, 471 Mass. 446 (2015)