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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO, HALL OF JUSTICE

THE PEOPLE OF THE STATE OF
CALIFORNIA, acting by and through
DAMON M. BROWN, COUNTY COUNSEL
for the COUNTY OF SAN DIEGO,

Plaintiff,

vs.

POLYMAKER LLC, a Delaware limited
liability corporation; and DOES 1 through 50,
inclusive,

Defendant.

Case No.

**COMPLAINT FOR VIOLATIONS OF
UNFAIR COMPETITION LA W,
CALIFORNIA BUSINESS AND
PROFESSIONS CODE §§ 17200, *et seq.***

**EXEMPT FROM FILING FEES UNDER
GOVERNMENT CODE § 6103**

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1 The People of the State of California, acting by and through DAMON M. BROWN, County
2 Counsel for the County of San Diego (“Plaintiff”), bring this action against Defendant Polymaker
3 LLC, a Delaware limited liability corporation (“Polymaker”), and Defendant Does 1 through 50
4 (collectively, “Defendants”) and allege the following on information and belief:

5 **I. INTRODUCTION**

6 1. California has instituted strong gun safety laws for public safety and to save lives.
7 The People bring this action against Polymaker, a manufacturer and retailer of 3D printer filament,
8 for knowingly designing, marketing, and selling its products in an unfair and unlawful manner that
9 profits from and exacerbates California’s ongoing “ghost gun” crisis at the expense of public safety
10 and loss of life.

11 2. “Ghost guns”—untraceable, unserialized guns produced by individuals who
12 typically do not have a license to manufacture firearms—represent a serious and fast-growing threat
13 to public safety in California. Aptly named, ghost guns are often untraceable through traditional
14 law enforcement investigative methods and circumvent registration and background check
15 requirements put in place by gun safety laws enacted by California’s legislature.

16 3. Over the past decade, California has become the epicenter of the devastating ghost
17 gun crisis. The effects on public safety have been profound and adverse. The number of ghost
18 guns recovered in connection with suspected criminal activity in California has increased
19 exponentially over the past decade, from just 26 total ghost guns recovered in 2015 to 12,894 in
20 2022.

21 4. Through the leadership of the California legislature, the California Attorney
22 General’s Office, and state and local law enforcement, California has started to make real progress
23 in the fight against ghost guns. However, a new generation of ghost guns, 3D printed ghost guns,
24 threatens to undo that progress.

25 5. The manufacture of 3D printed ghost guns is on the rise. Unlike ghost guns
26 assembled from commercially sold unfinished parts, 3D printed ghost guns can be produced from
27 plastic filament using consumer-grade equipment. No specialized machinery is required beyond a
28 commercially available 3D printer and the required computer code—also known as digital firearm

1 manufacturing code (“DFMC”)—which provides a 3D printer with the instructions to print a
2 firearm or firearm accessory and is available to download for free on the internet. Upon acquiring
3 a 3D printer, a fully functional, untraceable firearm can be printed and assembled by anyone in less
4 than nine hours. 3D printers can also be used to manufacture dangerous firearm accessories, such
5 as an auto sear—a part that converts a semi-automatic gun into essentially a “machine gun” by
6 holding the trigger bar down to enable continuous, fully automatic—and other rapid-fire conversion
7 devices.

8 6. In response to this new, dangerous reality, California has enacted statutes and
9 regulations to combat 3D printed firearms’ threat to public safety. Building on its general
10 prohibition against the manufacture of unlicensed firearms, California recently banned the
11 distribution of DFMC to anyone without the requisite license.¹ As of January 1, 2026, California
12 prohibits knowingly facilitating the unlawful manufacture of firearms.²

13 7. California law further extends its firearms regulatory framework to “firearm
14 precursor parts,” defined to include any article “marketed or sold to the public to become or be used
15 as the frame or receiver of a functional firearm once completed, assembled or converted.”³ The
16 California Department of Justice (“Cal DOJ”) has confirmed, through its published Firearm
17 Precursor Part Identification Guidebook, that this definition includes raw materials marketed or
18 sold to the public to become or be used as the frame or receiver of a functional firearm.⁴

19 8. In addition to these regulatory efforts, local governments in California have worked
20 in conjunction with state leaders to protect the public from the threat of 3D printed ghost guns. For
21 example, the City Attorney of San Francisco, in collaboration with the California Attorney General,
22 filed a lawsuit targeting affiliated entities and individuals that distribute DFMC to enable the 3D
23 printing of more than 150 designs of unserialized ghost guns and firearm devices by anyone with
24 an internet connection and a 3D printer.⁵

25 ¹ Cal. Civ. Code § 3273.61(a)(1).

26 ² Cal. Civ. Code § 3273.625.

27 ³ Cal. Penal Code § 16531(a).

28 ⁴ *See infra* Section IV.A.i.

⁵ *People v. Gatalog Foundation Inc.*, Cal. Super. Ct., CGC-26-633508, Dkt. # 1 (“Gatalog Compl.”) at 12–24.

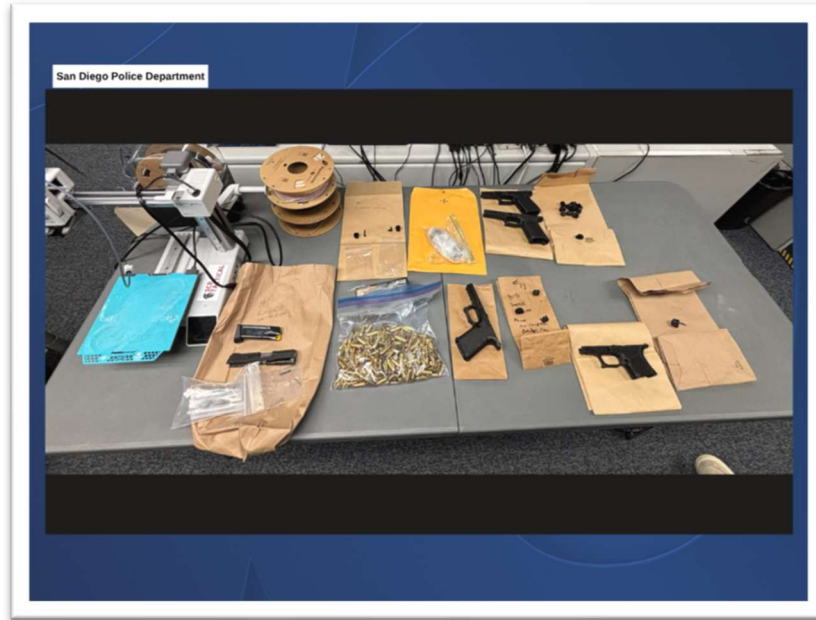
1 9. Despite these efforts, Polymaker continues to profit from the illegal manufacture of
2 3D printed ghost guns in California. Polymaker sells 3D printer filament, the spooled plastic
3 material that functions as the 3D printer’s “ink.” Unlike most other 3D print filament companies,
4 Polymaker knowingly designs, markets, and sells its filament, to anyone with internet access, to
5 make and become the frame, receiver, and/or other component parts of 3D printed ghost guns.

6 10. Polymaker’s knowledge and intent is evidenced by its extensive marketing and
7 product design efforts, including: (i) creating and selling a special product line branded with gun-
8 rights slogans in collaboration with a leading 3D printed gun influencer; (ii) hiring as Head of
9 Customer Experience a prominent 3D printed gun influencer, Sean Aranda, known online as the
10 “3D Print General”; (iii) featuring firearms in marketing materials on its website
11 (us.polymaker.com); (iv) establishing affiliate partnerships with 3D printed gun influencers
12 wherein influencers earn commissions for directing followers to Polymaker’s products;
13 (v) promoting the utility of its filament to 3D print firearms on 3D printed gun community message
14 boards; and, (vi) providing guidance on its company “Wiki” webpage on what adhesive to use to
15 bond 3D printed gun components to machined metal parts. Taken together, these actions reflect
16 Polymaker’s comprehensive business strategy to market and sell its filament to facilitate the 3D
17 printing of ghost guns and for its filament to become the frames or receivers of 3D printed firearms,
18 in violation of California’s gun safety laws. Polymaker’s actions have yielded the intended results,
19 persuading leading 3D printed gun influencers to promote Polymaker as the filament of choice to
20 3D print ghost guns.

21 11. Polymaker’s conduct violates California law, including the Unfair Competition Law
22 (Bus. & Prof. Code § 17200 *et seq.*). Specifically, by designing, marketing, and selling selected
23 filaments to manufacture 3D printed ghost guns, Polymaker has sold firearm precursor parts, as
24 defined by Cal. Penal Code § 16531(a), in violation of the regulatory requirements applicable to
25 such parts, under Cal. Bus. & Prof. Code § 22949.62, and in violation of Cal. Penal Code § 30400.

26 12. Polymaker’s unlawful actions have led to concrete harm in San Diego County. In
27 May 2026, after arresting a 16-year-old who was carrying a loaded handgun at school and
28 trafficking firearms, the San Diego Police Department’s Ghost Gun Team searched the teen’s gun-

1 printing home workshop and found Polymaker filament, four 3D printed handgun frames, 3D
2 printed machine gun conversion devices, over a hundred rounds of ammunition, and a 3D printer.⁶



13 *Fig. 1: Photo of Ghost Guns and Polymaker Filament Recovered by San Diego Police*
14 *Department*⁷

15 13. To be clear, 3D printing filament is not inherently illicit and has many lawful,
16 productive purposes, and this lawsuit does not seek to ban the sale of filament in California. Rather,
17 the People bring this lawsuit to hold Polymaker liable for its strategic business choice to design and
18 market its filaments in order to profit from the illegal manufacture of 3D printed ghost guns in
19 California. These actions violate California law and reflect a conspicuous disregard for the public
20 safety interests of Californians that those laws are designed to protect.

21 14. The People bring this action to stop Polymaker from continuing to fuel the
22 proliferation of illegal 3D printed firearms and prohibited firearm accessories in California.

25 ⁶ San Diego Police Department (@sandiegopd), Instagram (May 13, 2026),
26 https://www.instagram.com/p/DYTWVvk0lJox/?utm_source=ig_embed&ig_rid=AIsv8MKzYlfZgS-zz21N_4G&img_index=1 [<https://perma.cc/V4U7-W5W4>].

27 ⁷ Jermaine Ong, SDPD: 16-year-old arrested at San Diego school campus with concealed gun in
28 pants, abc10News San Diego (May 14, 2026), <https://www.10news.com/news/local-news/sdpd-16-year-old-arrested-at-san-diego-school-campus-with-concealed-gun-in-pants>
[<https://perma.cc/FM83-F73R>].

1 **II. PARTIES**

2 15. Plaintiff is the People of the State of California by and through the Damon Brown,
3 County Counsel, for the County of San Diego. California’s Unfair Competition Law (“UCL”), Cal.
4 Bus. and Prof. Code § 17200, *et seq.*, authorizes San Diego’s County Counsel to bring civil actions
5 against any person who violates the UCL, in the name of the People of the State of California.

6 16. Defendant Polymaker LLC is a limited liability company formed in Delaware with
7 its principal place of business in Missouri City, Texas. Polymaker is registered to do business in
8 California, and its registered agent in California is Northwest Registered Agent, Inc., 1505
9 Corporation Northwest Registered Agent, Inc., whose principal address is in Sacramento,
10 California. Polymaker’s Statement of Information, filed in 2025 with the California Secretary of
11 State, identifies Jun Li as the sole manager or member of the LLC and identifies his address as 2108
12 N Street, Suite N, Sacramento, California 95816.

13 17. The true names and capacities of Defendants DOES 1 through 50 are unknown to
14 Plaintiff. Plaintiff will seek leave of court to amend this Complaint to allege such names and
15 capacities as soon as they are ascertained. Each of the Defendants herein was the agent, joint
16 venture, or employee of each of the remaining Defendants, and in doing the things hereinafter
17 alleged, each was acting in the course and scope of said agency, employment, or joint venture with
18 advance knowledge of, acquiescence in or subsequent ratification of the acts of each and every
19 other remaining defendant. Each of Defendants DOES 1 through 50 is responsible, legally,
20 negligently, or in some other actionable manner, for the events and happenings hereinafter referred
21 to, and caused injuries and damages proximately thereby to Plaintiff as hereinafter alleged, either
22 through co-defendants’ conduct or through the authorized and/or ratified conduct of its agents,
23 servants, or employees or in some other manner.

24 **III. JURISDICTION AND VENUE**

25 18. This Court has jurisdiction over this action pursuant to California Constitution
26 article VI, § 10 and California Code of Civil Procedure § 410.10.

27 19. This Court has personal jurisdiction over Defendant Polymaker because Polymaker,
28 directly and through its agents, has engaged in systematic and continuous business activities in

1 California. These activities include the design, marketing, and sale of filament spools into
2 California to manufacture 3D printed ghost guns. Polymaker has purposefully targeted California
3 consumers and has availed itself of the benefits and protections of California law.

4 20. Polymaker imports filaments from China through California, specifically through
5 the Long Beach and Los Angeles ports.⁸ California receives approximately thirty-four percent of
6 Polymaker's imports.⁹

7 21. Polymaker's website demonstrates that the company specifically targets California
8 customers. Polymaker has several pages on its website tailored to California customers. For
9 example, Polymaker maintains a webpage where it advises California customers of potential
10 chemical exposure risks from its products, as required by California Proposition 65.¹⁰ Polymaker
11 also maintains a webpage advising California customers of their rights, under the California
12 Consumer Privacy Act ("CCPA").¹¹ In an apparent effort to comply with the CCPA, and thereby
13 continue to avail itself of California's market, Polymaker's privacy policy includes a provision
14 specifically addressing California customers.¹²

15 22. The violations of law alleged in this Complaint occurred in the County of San Diego
16 and elsewhere throughout California.

17 23. Venue is proper in this Court, pursuant to California Code of Civil Procedure
18 § 395.5, because Polymaker's solicitation, marketing, sales, and distribution activities occurred in
19 the County of San Diego and elsewhere throughout California, and, therefore, Polymaker's liability
20 arises in the County of San Diego.

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23 ⁸ *Polymaker*, ImportYeti.com, <https://www.importyeti.com/company/polymaker> (last visited
Sept. 10, 2026) [<https://perma.cc/LT8F-TENJ>].

24 ⁹ *Id.*

25 ¹⁰ *California Proposition 65 Notice*, Polymaker.com,
<https://shop.polymaker.com/pages/california-proposition-65-notice> (last visited Sept. 10, 2026)
[<https://perma.cc/RC58-T8SA>].

26 ¹¹ *CCPA Opt Out*, Polymaker.com, <https://us-wholesale.polymaker.com/pages/ccpa-opt-out> (last
visited Sept. 10, 2026) [<https://perma.cc/N862-VCUD>].

27 ¹² *Privacy Policy*, Polymaker.com, <https://shop.polymaker.com/policies/privacy-policy> (last
28 visited Sept. 10, 2026) [<https://perma.cc/MB4L-XFAA>] (explaining rights of California residents
under the CCPA).

24. Venue is also proper in this Court, pursuant to California Code of Civil Procedure § 393(a), because violations of law that occurred in the County of San Diego are a “part of the cause” upon which Plaintiff seeks the recovery of penalties imposed by statute.

IV. FACTUAL BACKGROUND

A. 3D Printed Ghost Guns and Prohibited Firearm Accessories Evade California Gun Laws and Are a Grave Threat to Public Safety

25. California law requires that firearms be sold with an identifying serial number and be subject to point-of-sale requirements, including a background check. The serialization requirement ensures that firearms are traceable by law enforcement, and the background check requirement helps prevent dangerous weapons from reaching individuals with a heightened risk of misuse. Ghost guns frustrate both aspects of that regulatory regime, and 3D printed ghost guns are particularly problematic. Like other ghost guns, they are unserialized, rendering traditional tracing ineffective. They also enable unlicensed individuals and people prohibited from possessing firearms, *e.g.*, minors and persons convicted of a felony, to evade background check requirements as the weapons can be easily manufactured at home using consumer-grade 3D printers.

26. In addition to ghost guns, 3D printers can also be used to manufacture dangerous firearm accessories such as auto sears or other rapid-fire conversion devices that allow semi-automatic firearms to fire at a rate nearly identical to fully automatic machine guns. Auto sears and rapid-fire conversion devices are illegal under California law.¹³ 3D printed ghost guns and these dangerous 3D printed firearm accessories pose significant public safety challenges in California.

27. According to a 2023 report from the California Office of Gun Violence Prevention, the number of ghost guns recovered in connection with crimes in California has increased exponentially over the past decade.¹⁴ California also bears a disproportionate share of the national

¹³ See Cal. Penal Code §§ 16930, 16880, 32625, and 32900.

¹⁴ Office of Gun Violence Prevention, Cal. Dep't of Just., *Data Report: The Impact of Gun Violence in California 21-22* (2023), <https://oag.ca.gov/system/files/media/OGVP-Data-Report-2022.pdf> [<https://perma.cc/2UYL-Q4ZS>].

1 burden: between 2017 and 2021, 54.9% (20,875 of 37,980) of all suspected ghost guns recovered
2 in the United States were found in California.¹⁵

3 28. There has been a similar nationwide explosion in the recoveries of auto sears,
4 including those that are 3D printed. Between 2017 and 2021, the Bureau of Alcohol, Tobacco,
5 Firearms, and Explosives (“ATF”) recovered nearly 5,500 machine gun conversion devices
6 (“MCDs”)—a 570% increase over the number the ATF recovered in the previous five years.¹⁶ This
7 led Cal DOJ to declare 3D printed MCDs “a fast-growing public safety threat.”¹⁷

8 ***i. California Law Regulating Ghost Guns***

9 29. Recognizing the threat to public safety, the California legislature has enacted
10 legislation to curb the proliferation of ghost guns. As part of a package of comprehensive reforms
11 enacted in 2022, California passed Assembly Bill 1621, which bans the self-manufacture of
12 unserialized firearms. It also defines “firearm precursor parts” broadly as “any forging, casting,
13 printing, extrusion, machined body or similar article . . . that is marketed or sold to the public to
14 become or be used as the frame or receiver of a functional firearm once completed, assembled or
15 converted.”¹⁸ These reforms ensure that both completed and unfinished frames and receivers are
16 subject to the same safety requirements as fully assembled firearms, including mandatory
17 serialization, background checks, and sales through licensed dealers.¹⁹

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20 ¹⁵ Alaina De Biasi *et al.*, *Ghost Guns and Crime: A Tale of Two California Cities*, 11 Injury
21 Epidemiology 17 (2024), <https://pmc.ncbi.nlm.nih.gov/articles/PMC11067238/#Fn3>
22 [<https://perma.cc/VWX2-V6UJ>].

23 ¹⁶ Bureau of Alcohol, Tobacco, Firearms & Explosives, *National Firearms Commerce and*
24 *Trafficking Assessment (NFCTA): Crime Guns - Volume Two, Part VII: Recommendations and*
25 *Future Enhancements* 4 (2023).

26 ¹⁷ Office of Gun Violence Prevention, Cal. Dep’t of Justice, *A Strategic Plan to Sustain*
27 *California’s Record Progress Against Gun Violence* 17 (2026),
28 <https://oag.ca.gov/system/files/media/OGVP-AB1252-Report-2026.pdf> [<https://perma.cc/3U8P-L7E2>].

¹⁸ Cal. Penal Code § 16531(a).

¹⁹ Similar provisions enacted in the California Business and Professions Code, effective January 1, 2023, further require firearm manufacturers to obtain state and federal licenses, comply with enhanced security and recordkeeping standards, and prohibit the sale or transfer of unserialized or unlawfully manufactured firearms and components. *See, e.g.*, Cal. Bus. & Prof. Code § 22949.60-71.

1 30. Following the enactment of Assembly Bill 1621, Cal DOJ issued regulations that
2 provide written guidance and visual diagrams to demonstrate examples of materials that qualify as
3 “firearm precursor parts.” Examples of “firearm precursor parts” encompassed by the Cal DOJ
4 regulations include raw materials that are specifically sold or marketed to the public to become
5 frames or receivers.

6 31. For example, in its Firearm Precursor Identification Guidebook, Cal DOJ includes
7 as an example of a regulated firearm precursor part a product called the “AR-00,” which is sold by
8 Ghost Gunner, a well-known ghost gun company:



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Fig. 2: The “AR-00” Receiver sold by Ghost Gunner²⁰

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20 32. Ghost Gunner’s AR-00 allows users to manufacture an unregistered AR-15 receiver
21 at home from an unformed block of aluminum.²¹

22 33. Cal DOJ has classified the “AR-00” as a “firearm precursor part,” even though it is
23 “an unformed block of aluminum,” precisely because Ghost Gunner markets the product to the
24 public as an object that will become a receiver. Manufacturers, sellers, and distributors of raw
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26 ²⁰ Cal. Dep’t of Just., Bureau of Firearms, *Firearm Precursor Part Identification Guidebook 4*
27 (rev. Aug. 2022), <https://oag.ca.gov/system/files/media/bof-reg-rev-fpp-id-guidebook.pdf>
28 [<https://perma.cc/2S8V-JQBM>].

²¹ *Zero Percent*, Ghost Gunner, <https://ghostgunner.net/zero-percent/> (last visited Apr. 15, 2026)
[<https://perma.cc/C56Q-LHN7>].

1 materials are on notice that such products may qualify as “firearm precursor parts,” under California
2 law, if they are marketed to consumers as parts that will become frames or receivers.

3 34. California has also prohibited the distribution of DFMC, which provides 3D printers
4 with the digital instructions to print a firearm or firearm accessory, to anyone without the requisite
5 manufacturing license.²² Effective January 1, 2026, California bans knowingly, willfully, or
6 recklessly aiding, abetting, promoting, or facilitating the unlawful manufacture of firearms,
7 including manufacture using a 3D printer by an unlicensed person.²³ These numerous legislative
8 efforts reflect California’s strong public policy opposition to ghost guns and 3D printed ghost guns
9 in particular.

10 ***ii. California Lawsuits Against Distributors of 3D Printed Ghost Guns***

11 35. In addition to California’s legislative efforts to curb the proliferation of 3D printed
12 ghost guns, the California Attorney General and City Attorney of San Francisco have brought a
13 lawsuit against affiliated entities and individuals—including, among others, Gatalog Foundation
14 Inc. (“Gatalog”), CTRLPew LLC (“CTRL+Pew”),²⁴ and Alexander Holladay—for conspiring to
15 distribute DFMC to facilitate the unlawful 3D printing of firearms and firearm accessories, in
16 violation of state law.²⁵

17 36. As alleged, Gatalog, CTRL+Pew, and the individual defendants operate interrelated
18 organizations and websites that facilitate and promote the distribution of DFMC to anyone with an
19 internet connection, enabling the printing of more than 150 different designs of ghost guns and
20 firearm accessories, including auto sears and rapid-fire conversion devices.²⁶

21 37. CTRL+Pew’s corporate entity, CTRLPew LLC, was formed by Alexander
22 Holladay in 2020, and in addition to serving as CTRL+Pew’s manager and registered agent, he is
23 a principal and the treasurer of Gatalog Foundation Inc.²⁷ Holladay also distributes his own

24 ²² See, e.g., Cal. Civ. Code § 3273.61(a)(1).

25 ²³ Cal. Civ. Code § 3273.625(a).

26 ²⁴ As alleged, the name “CTRL+Pew” is a play on the keyboard shortcut to print (control + P)
with “Pew” standing for “Print every weapon.” The name reframes the familiar print command as
a command to “print every weapon.”

27 ²⁵ See Gatalog Compl.

28 ²⁶ Gatalog Compl. ¶¶ 5, 40, 58, 72-73.

²⁷ Gatalog Compl. ¶¶ 11, 84.

1 DFMC—including designs for two frames/receivers and a silencer—that are posted on CTRL+Pew
2 and available for download on Odysee.com, an online file sharing platform.²⁸

3 38. As part of the California Attorney General’s investigation of Gatalog and
4 CTRL+Pew’s operations, a law enforcement analyst in California downloaded the DFMC for a
5 firearm labeled the “FMDA DD 19.2”²⁹ and, using the downloaded code and accompanying step-
6 by-step instructions (which specify the recommended filament, 3D printer model, and print
7 parameters), printed three firearm frames in approximately 7.5 hours each.³⁰ Another member of
8 law enforcement in California then, in one hour, combined one of the 3D printed frames with other
9 commonly available firearm parts to assemble a functional firearm.³¹

10 39. The investigation demonstrated how Gatalog and CTRL+Pew’s distribution of
11 DFMC threatens public safety in California by enabling anyone to print and assemble a functioning,
12 unserialized ghost gun in a mere 8.5 hours.³²

13 **B. Polymaker’s Operations**

14 40. Polymaker manufactures, markets, and sells raw materials for 3D printing to
15 consumers in California and throughout the United States, ranging from standard polylactic acid
16 (“PLA”) filament to industrial-grade polycarbonates and carbon-fiber-reinforced composites. The
17 mechanical properties that Polymaker contends make its filament desirable for industrial
18 applications—kinetic durability, impact resistance, and thermal tolerance—are the same properties
19 Polymaker and its affiliates promote as making its filaments effective for manufacturing functional
20 3D printed ghost guns.

21 41. To maximize its profits, Polymaker designs, markets, and sells filament specifically
22 to consumers to 3D print ghost guns and other dangerous firearms accessories. In service of this
23 business strategy, Polymaker has fostered business relationships with organizations like Gatalog

24 ²⁸ Gatalog Compl. ¶ 94.

25 ²⁹ FMDA is an acronym for the slogan “Free men don’t ask.” See Andy Greenberg, Wired, *The*
26 *‘Ghost Gun’ Linked to Luigi Mangione Shows Just How Far 3D-Printed Weapons Have Come*,
(Dec. 10, 2024) <https://www.wired.com/story/luigi-mangione-united-healthcare-3d-printed-gun-fmda-chairmanwon-v1/> [<https://perma.cc/DW7Y-2J29>].

27 ³⁰ Gatalog Compl. ¶ 80.

28 ³¹ Gatalog Compl. ¶ 82.

³² Gatalog Compl. ¶ 83.

1 and CTRL+Pew that knowingly distribute DFMC and has partnered with 3D printed gun
2 influencers by providing them with affiliate links that enable influencers to earn a commission
3 when their followers use the links to buy Polymaker filament to 3D print ghost guns.

4 ***i. Polymaker Facilitates the Manufacture of 3D Printed Ghost Guns***

5 42. Polymaker’s marketing of its filaments to 3D print ghost guns reflects a deliberate
6 and sustained commercial strategy. Since at least October 2022, Polymaker has offered special
7 edition “creator spools” of filament,³³ which are the product of a collaboration between Polymaker
8 and selected content creators. Polymaker advertises that fans of the content creators can “support[]
9 the creators” by buying the spools.³⁴ One creator spool that Polymaker has continually restocked
10 is the “3D Print General PLA Pro” filament, made in collaboration with 3D printed gun influencer
11 Sean Aranda, who posts content online under the alias “the 3D Print General.”³⁵ The 3D Print
12 General filament packaging bears the 3D Print General’s logo—a likeness of Aranda—along with
13 the slogan “Come and Make It,” a play on words of the often-used gun rights motto “come and take
14 it.”³⁶ The packaging design elements signal to consumers that the product is intended for firearm
15 manufacturing purposes.

24 ³³ 3D-printing materials are typically solid plastic strands wound around spools.

25 ³⁴ Video posted by Polymaker (@polymaker_lab), Instagram, Sept. 19, 2025,
26 <https://www.instagram.com/reel/DOyV6rdDRAG/> [<https://perma.cc/NJ7U-VX63>].

27 ³⁵ See *infra* Fig. 3; Aranda operates 3D Print General accounts or channels on the online
28 platforms Rumble, Instagram, Facebook, TikTok, X, and previously on YouTube.

³⁶ See Chase Woodruff, *The Meaning Behind Molon Labe, a Favored Gun Rights Slogan of Oregon Sheriff John Hanlin*, The Trace (Oct. 2, 2015), <https://www.thetrace.org/2015/10/oregon-sheriff-molon-labe-sandy-hook/> [<https://perma.cc/V44N-HTVE>].



Fig 3: Polymaker's 3D Print General PLA Pro filament. The label features an illustrated likeness of 3D printed gun influencer Sean Aranda, whose alias is the "3D Print General."³⁷



Fig. 4: "Come and Take It" Flag

³⁷ Creator Special Edition: 3D Print General, Polymaker, <https://us.polymaker.com/products/creator-spool?srltid=AfmBOoocBjnoS2uBRTNJZGdCnyuEnAsfoFUL-gaKL5aPl0uosorMu7Xt> (last visited Sept. 11, 2026) [<https://perma.cc/WX4Z-T6N8>].

1 43. The design, marketing, and sale of the “3D Print General” filament was, and
2 continues to be, a product of Polymaker’s collaboration with Sean Aranda. When Polymaker first
3 launched the 3D Print General PLA Pro creator spool, the product page on Polymaker’s website
4 included a video Aranda made and published on Rumble—an online video-sharing platform—
5 announcing the spool and the collaboration, highlighting the filament’s “flat dark earth”³⁸ color and
6 featuring blurred out but discernible images of firearms Aranda attests to having printed using the
7 3D Print General filament.³⁹

24 ³⁸ Flat dark earth is a medium-dark, matte brown color commonly used in tactical and firearm
25 applications. See Sig Sauer, *FDE Finish Handguns*, [https://www.sigsauer.com/shop/fde-finish-](https://www.sigsauer.com/shop/fde-finish-handguns)
26 *handguns* [<https://perma.cc/3VMH-J8TY>] (last visited Sept. 11, 2026); Heckler & Koch, *Flat*
27 *Dark Earth (FDE) and Tactical Models Join the HK VP Product Line*, [https://hk-](https://hk-usa.com/2023/09/11/flat-dark-earth-fde-and-tactical-models-join-the-hk-vp-product-line/)
28 [usa.com/2023/09/11/flat-dark-earth-fde-and-tactical-models-join-the-hk-vp-product-line/](https://perma.cc/W6PQ-RN49)
[<https://perma.cc/W6PQ-RN49>] (last visited Sept. 11, 2026).

³⁹ The 3D Print General, *3D Print General PLA Pro*, Rumble, [https://rumble.com/v1mjng1-3d-](https://rumble.com/v1mjng1-3d-print-general-pla-pro.html)
print-general-pla-pro.html at 0:53 (last visited Sept. 11, 2026) [<https://perma.cc/5CVR-E9DX>].

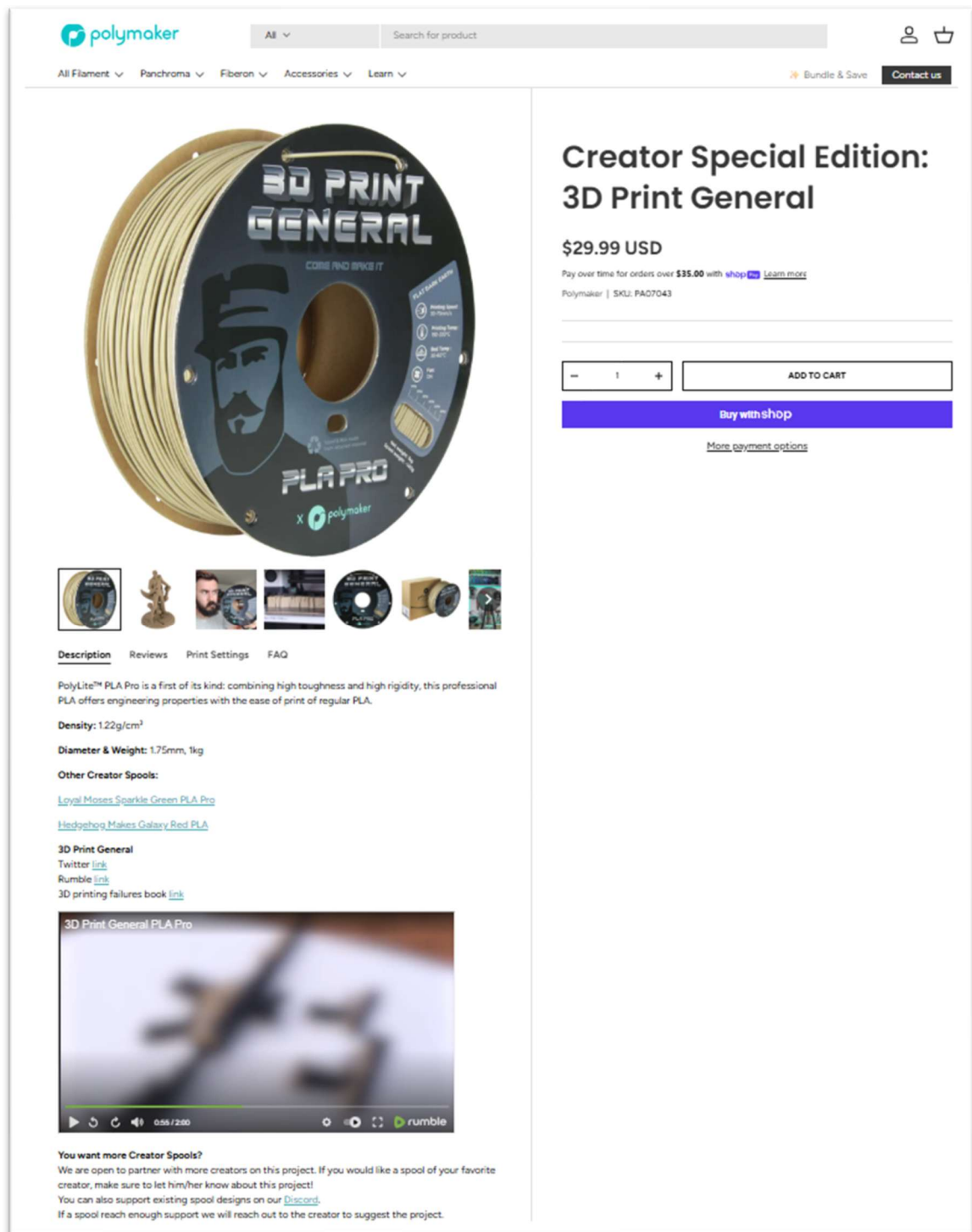


Fig. 5: Screenshot of Polymaker's Original Product Page for the 3D Print General Spool⁴⁰

⁴⁰ Creator Special Edition: 3D Print General, Polymaker, <https://shop.polymaker.com/products/creator-spool> (last visited Sept. 11, 2026) [https://perma.cc/ACF7-X8C5].

1 44. In a subsequent video posted to Aranda’s 3D Print General channel on Rumble, the
2 image that is blurred out in the preceding video is unblurred, allowing viewers to see in detail the
3 firearms that Aranda purports to have manufactured using the Polymaker 3D Print General PLA
4 Pro filament.⁴¹ In that same video, Aranda is seen shooting a rifle that he states was printed with
5 Polymaker’s 3D Print General PLA Pro filament, and he claims to have already fired 200 rounds
6 through the rifle.



13 *Fig. 6: Screenshot from uncensored video on 3D Print General*⁴²

14 45. Polymaker specifically markets its filament for use in manufacturing 3D printed
15 ghost guns. For example, Polymaker’s website advertises its Fiberon PA612-CF15 filaments by
16 displaying a picture of a 3D printed gun component printed using the Fiberon product.

17 46. Similarly, on its website’s product pages marketing its HT-PLA Pro filament spools,
18 Polymaker features images of what it claims are “toy” guns and gun accessories alongside outdoor
19 toys and sports equipment. On these product pages, Polymaker emphasizes that HT-PLA Pro
20 filament is a “stronger, heat-ready everyday PLA for functional parts that need to hold their
21 shape”⁴³ and that it is “better suited for warm-use cases such as . . . parts placed near heat-emitting
22
23

24 ⁴¹ The 3D Print General, *The Best FDE 3D Printing Filament* (Rumble, Oct. 4, 2022),
25 <https://rumble.com/v1mk7ng-the-best-fde-3d-printing-filament.html> at 0:45
[<https://perma.cc/CMU6-4S37>].

26 ⁴² *Id.* at 0:45.

27 ⁴³ Image on Polymaker HT-PLA Pro Product Page, Polymaker.com,
28 https://shop.polymaker.com/cdn/shop/files/Image_4_732e4a71-a5d0-4e46-987d-6642a600813a.jpg?v=1784169756&width=1440 [<https://perma.cc/2FTA-EC6E>] (last visited Sept. 11, 2026).

1 machinery.”⁴⁴ Polymaker uses this coded language to alert customers that its filament can be used
2 to 3D print firearms.



Fig. 7: HT-PLA Pro on Polymaker Website⁴⁵

11 47. Notably, also on its HT-PLA Pro product page, Polymaker features “verified”
12 customer reviews that contain images of 3D printed firearms that customers have purportedly
13 printed with Polymaker’s filament. These images demonstrate that Polymaker not only markets its
14 filament to become firearms but knows and promotes that its filament is used to 3D print ghost
15 guns.

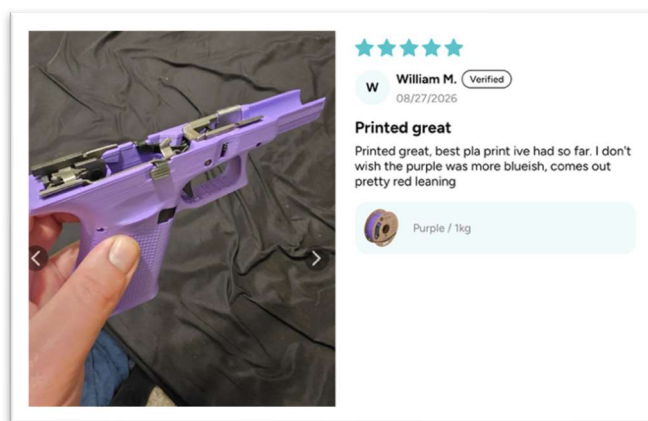


Fig. 8: Customer Review Featuring 3D Printed Pistol Frame Printed with HT-PLA Pro⁴⁶

⁴⁴ 3D Print General Flat Dark Earth Product Page, Polymaker.com, <https://shop.polymaker.com/products/polymaker-ht-pla-pro?variant=45811975323705> [https://perma.cc/28Z9-W53P] (last visited Sept. 11, 2026).

⁴⁵ Polymaker HT-PLA Pro Product Page, Polymaker.com, <https://shop.polymaker.com/products/polymaker-ht-pla-pro?variant=45811969327161> [https://perma.cc/7USQ-5S35] (last visited Sept. 11, 2026).

⁴⁶ *Id.*

1 48. Further reflecting Polymaker’s commercial strategy to market its filament’s utility
2 to 3D print guns, Polymaker’s website offers guidance on which adhesives to use to bind firearm
3 components printed with Polymaker filament when assembling a 3D printed ghost gun. In
4 recommending the “J-B Weld” adhesive, Polymaker states that it is “[p]opular in functional
5 applications like 3D-printed firearms.”⁴⁷

6 49. Polymaker’s strategy of marketing its filament to become frames or receivers of 3D
7 printed firearms extends to customer support and feedback the company provides to consumers
8 who use its filament to 3D print ghost guns. On the Reddit forum r/3D2A,⁴⁸ when a user asked
9 whether other users had tried “Polymaker polymax PLA . . . for 2a stuff,” an official Polymaker
10 account (Polymaker_3D) responded, commenting on the mechanical properties of three Polymaker
11 filaments.⁴⁹ On the now-shuttered Reddit forum r/fosscad, which Reddit suspended for posting
12 illegal content, a user asked, “Which is better for building guns?”—comparing Polymax vs. Polylite
13 PLA. To that question, Polymaker’s official account responded and recommended Polymaker’s
14 PolyLite PLA Pro filament, noting that it “was the perfect fit for your application according [to]
15 the feedback we received.”⁵⁰ This demonstrates Polymaker’s direct knowledge of, marketing to,
16 and engagement with consumers specifically seeking to manufacture firearms with Polymaker
17 products.

18 50. Posts by Polymaker customers on online forums likewise confirm that Polymaker’s
19 marketing strategy has succeeded in making Polymaker filament the filament of choice for
20 manufacturing 3D printed ghost guns. One Reddit user wrote “I have a Polymaker Pla pro Glock
21
22

23 ⁴⁷ *Glueing*, Polymaker.com, <https://wiki.polymaker.com/printing-tips/post-processing/glueing>
24 (last visited Sept. 10, 2026) [<https://perma.cc/MXU5-4XU4>].

25 ⁴⁸ The name of the Reddit forum, 3D2A, stands for, roughly, 3D Printing (of guns) and the
26 Second Amendment and focuses on open-source firearm design and printing.

27 ⁴⁹ u/Polymaker_3D, Comment to *Polymaker polymax PLA?*, Reddit: r/3D2A (Dec. 22, 2025),
28 https://www.reddit.com/r/3D2A/comments/1pqyth/polymaker_polymax_pla/
[<https://perma.cc/5CA8-4LU8>]

⁵⁰ After Reddit suspended the r/fosscad forum, its users created a new forum where they archived
posts from the r/fosscad forum at fosscad.io. See *Polymax Vs Polylite PLA*, Fosscad.io (Oct. 8,
2025), <https://fosscad.io/post/7133> [<https://perma.cc/N2SB-CUDF>].

1 with over 1000 rounds through it and no sign of failure yet.”⁵¹ Another user in the fosscad.io forum
2 wrote, “As soon as I saw Polymaker on a Facebook group interacting and complementing 3D2A
3 projects, they became my go-to filament. Kicks ass that a company would be behind our hobby.”⁵²
4 In the same thread, another user wrote that Polymaker “has been a long time supporter of 3d2a. I
5 use them most of the time.”⁵³ Another user responded on the thread saying “[Today I learned] they
6 are pro 2A. I might look at polymaker more even when it’s more expensive.”⁵⁴

7 51. In addition to persuading consumers, Polymaker’s strategy has persuaded leading
8 designers and distributors of DFMC to recommend Polymaker’s filament for making firearms and
9 dangerous firearm accessories. For example, some users recommend on their Odysee.com profiles
10 that Polymaker filament is the filament of choice to print auto sear accessories for AR-15s.⁵⁵

11 52. CTRL+Pew, one of the main distributors of illegal DFMC and one of the defendants
12 in *People v. Gatalog*, has also featured Polymaker’s products. CTRL+Pew selected and promoted
13 Polymaker’s filaments as “Pew’s Pick,” stating that “the deciding factor is Polymaker’s
14 involvement and willingness to interact with the 3d printing firearm community.”⁵⁶ CTRL+Pew’s
15 website further explains that Polymaker’s PLA Plus/Pro materials “have withstood the collective
16 abuse of hundreds of thousands of rounds from the 3D printing firearm community” and describes
17 it as “the standard material for firearm printing for the last few years.”⁵⁷

18 53. Polymaker’s marketing strategies have worked. Polymaker’s filament has been
19 selected and re-promoted by third parties, including many leading ghost gun companies. The
20

21 ⁵¹ u/PyilentBlue, Comment to *Polymaker pla pro*, Reddit: r/fossad,
22 https://web.archive.org/web/20250219171707/https://www.reddit.com/r/fossad/comments/18rjp3h/polymaker_pla_pro/

23 ⁵² u/dasimp86, Comment to *Yey or nay for a 17 lower? Polymaker pla pro*, Fossad.io (June 24,
24 2025), <https://fossad.io/post/72477> [<https://perma.cc/U9C5-873B>].

25 ⁵³ *Id.*

26 ⁵⁴ *Id.*

27 ⁵⁵ S3igu2, *(AR15) SFFA V2 Select Fire Full Auto*, Odysee (Dec. 20, 2023),
28 <https://odysee.com/@S3igu2:c/SF-Full-Auto-V1:1> [<https://perma.cc/E2UG-6JVL>].

⁵⁶ ctrlpew, *Getting Started Guide 3 – Filament Deathmatch*, CTRL+Pew (Aug. 6, 2024),
<https://ctrlpew.com/getting-started-3-filament-deathmatch/> [<https://perma.cc/V8ML-KSDK>].

⁵⁷ ctrlpew, *Getting Started Guide 0 – How to Start 3D Printing Quickly*, CTRL+Pew (Aug. 4,
2025), <https://ctrlpew.com/getting-started-0-how-to-start-3d-printing-quickly/>
[<https://perma.cc/SYU7-H32L>].

1 marketing has resulted in some companies that sell rapid-fire conversion devices to choose
2 Polymaker filament to manufacture their products. One company that sells a fast reaction trigger
3 for Glock-style handguns explains on its website that it uses Polymaker filament to print its
4 products because of Polymaker's "durability."⁵⁸

5 54. Another popular 3D printing gun website, "3D Gun Builder," names Polymaker's
6 PLA PRO filament the "Best for Most 3D Gun Prints."⁵⁹ 3D Gun Builder also promotes using
7 Polymaker filament to 3D print dangerous firearm accessories. For example, 3D Gun Builder's
8 website has a page on the "Hoffman Tactical Super Safety," a rapid-fire conversion device designed
9 for AR-15s that converts semiautomatic fire to near fully automatic machine gun fire and
10 specifically recommends using Polymaker PA12-CF filament to make these devices.⁶⁰

11 ***ii. Polymaker Promotes and Facilitates the Manufacture of Ghost Guns by Partnering***
12 ***with and Employing Sean Aranda***

13 55. As a part of its business strategy to promote the use of its filaments to manufacture
14 3D printed ghost guns, Polymaker partnered with 3D printed gun influencer, Sean Aranda. In
15 addition to working with Aranda to create, market, and sell the 3D Print General creator spool,
16 Polymaker hired Aranda as its Head of Customer Experience.

17 56. As discussed above, Aranda is an online influencer and content creator. He
18 previously ran a popular YouTube channel, "3D Print General," with 123,000 subscribers, where
19 he published 3D printing tutorials with an emphasis on 3D printed ghost guns. He also hosts a
20 podcast called "3D Printed Guns with Sean Aranda."⁶¹

21 57. According to Aranda, after YouTube "demonetized" his channel in September 2023,
22 Polymaker "instantly reached out" and started sponsoring his channel.

23 _____
24 ⁵⁸ 4140 Glock FRTv2, Muted Machine Works, <https://mutedmachineworks.com/product/glock-frt/>
[<https://perma.cc/7C7B-TA8Y>].

25 ⁵⁹ *Get Started*, 3D Gun Builder, <https://3dgunbuilder.com/get-started/> (last visited Sept. 11, 2026)
[<https://perma.cc/CN46-YA73>].

26 ⁶⁰ *Super Safety*, 3D Gun Builder, [https://3dgunbuilder.com/accessories/hoffman-tactical-super-](https://3dgunbuilder.com/accessories/hoffman-tactical-super-safety/)
safety/ (last visited Sept. 11, 2026) [<https://perma.cc/J26J-XTTY>].

27 ⁶¹ Sean Aranda, *3D Printed Guns with Sean Aranda*, SPOTIFY,
28 <https://open.spotify.com/show/1p9m4nQ72QNSDhKH4LwN7w> (last visited Sept. 11, 2026)
[<https://perma.cc/478N-7K8V>].

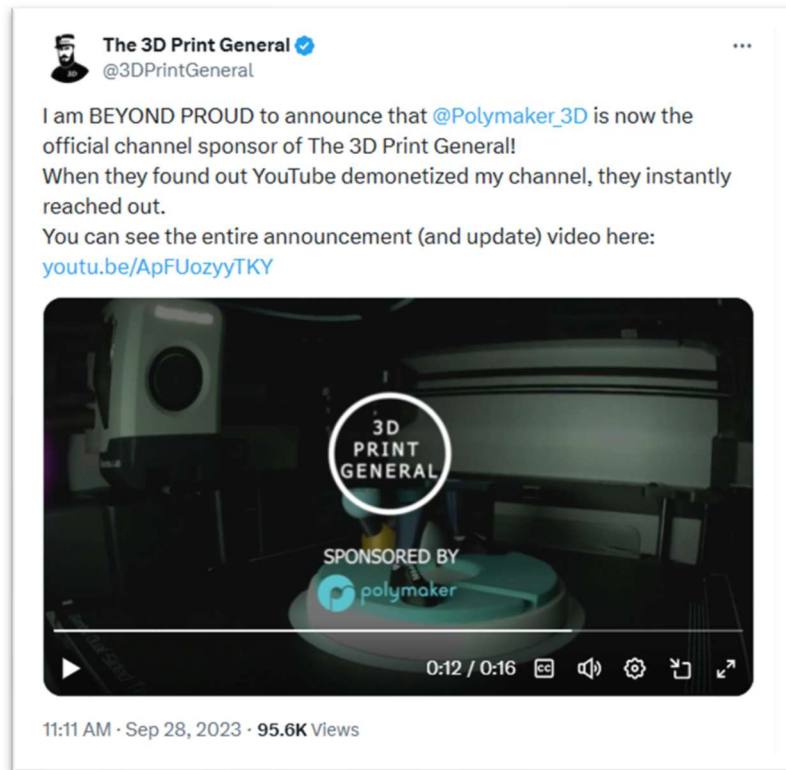


*Fig. 9: Aranda announcing Polymaker's sponsorship*⁶²

58. Aranda subsequently posted that his YouTube channel had been deleted and elaborated further on Polymaker's decision to sponsor him. According to Aranda, YouTube demonetized his channel, because it concluded he "was trying to sell illegal firearms."⁶³ In a video discussing Polymaker's sponsorship, posted on September 29, 2023, Aranda states that immediately following the demonetization of his YouTube channel, "Nicolas," a representative from Polymaker contacted Aranda and stated, "How much is YouTube paying you? We'll match it, we'll sponsor your channel. We want you to keep making content."⁶⁴

59. Polymaker's sponsorship of Aranda's account soon expanded to employment. On December 15, 2023, an official Polymaker account on X (@Polymaker_3D) announced: "We have

⁶² @3DPrintGeneral, X (Sept. 23, 2023),

<https://x.com/3dprintgeneral/status/1707458117879910608> [<https://perma.cc/SEF9-QJWQ>].

⁶³ *3D Printed Guns: Where Are We Now? 2025 Edition with CTRL Pew*, RUMBLE (last visited Sept. 11, 2026), https://rumble.com/v6rgsnv-3d-printed-guns-where-are-we-now-2025-edition-with-ctrl-pew-3dpgp-ep29.html?e9s=src_v1_sa%2Csrc_v5_sa_o%2Csrc_v1_ucp_v [<https://perma.cc/D5V2-7952>].

⁶⁴ @3DPrintGeneral, X (Sept. 29, 2023),

<https://x.com/3DPrintGeneral/status/1707938413788180922> [<https://perma.cc/7SKJ-UBCX>].

1 a new marketing recruit to ensure even more projects and community activities in 2024! Welcome
2 Sean to the Polymaker Maketing team [sic] [,]" to which Aranda responded that he was "stoked to
3 now officially be part of the @Polymaker_3D team!"⁶⁵

4 60. Polymaker's public announcement of Aranda as a "marketing recruit" on an official
5 corporate account reflects the company's deliberate commercial strategy to capture the 3D printed
6 gun market.

7 61. In light of Polymaker's prior interactions with Aranda, including the company's
8 willingness to sponsor Aranda's 3D Print General video channel, because Polymaker wanted him
9 to "keep making content," the company's announcement was made with full knowledge of
10 Aranda's audience and the purpose for which that audience used Polymaker's products.

11 62. The decision to hire Aranda successfully furthered Polymaker's commercial
12 strategy to corner the 3D printed ghost gun market, prompting leading influencer "Print Shoot
13 Repeat @printingguns," with over 740,000 YouTube subscribers, to respond enthusiastically to the
14 announcement: "Just when you thought Polymaker couldn't get any more based."⁶⁶

15 63. Polymaker continues to employ Aranda as the company's Head of Customer
16 Experience.⁶⁷ Aranda posts about his work for Polymaker on his @3DPrintGeneral account on X,
17 including promoting Polymaker filament, his 3D Print General creator spool, and featuring photos
18 of firearms printed with Polymaker filament.

21 ⁶⁵ @3DPrintGeneral, X (Dec. 15, 2023),
22 <https://x.com/3DPrintGeneral/status/1735741676528828618?s=20> [<https://perma.cc/MNE9-TYFP>].

23 ⁶⁶ @printingguns, X (Dec. 15, 2023),
24 <https://x.com/printingguns/status/1735789927676154029?s=20> [<https://perma.cc/6UNL-GR42>];
25 *see also* Merriam Webster, <https://www.merriam-webster.com/slang/based>
26 [<https://perma.cc/UX3S-VNJJ>], (defining "based" as slang "used approvingly to describe
someone who projects a lack of concern about how others feel about their actions or opinions. It
can also describe a thing, such as an action or event, perceived as both bold and commendable,
especially if it challenges or flouts convention in some way.").

27 ⁶⁷ Sean Aranda (@seanaranda), LinkedIn, <https://www.linkedin.com/in/seanaranda> (last visited
28 Sept. 10, 2026) [<https://perma.cc/2ND2-RNRG>] (About section stating: "I am currently working
as the Head of Customer Experience for the 3D printing materials company Polymaker – in
charge of global CX.").

64. By recruiting, compensating, and retaining Aranda as its Head of Customer Experience, Polymaker specifically targeted the 3D gun printing market. Polymaker's decision to hire Aranda was premised on the commercial value of Aranda's influence. Aranda, acting within his agency relationship with Polymaker, directs his followers to purchase Polymaker filaments to 3D print ghost guns and generates profits for Polymaker.

65. Acting as Polymaker's Head of Customer Experience, Aranda has encouraged his audience to purchase Polymaker products for use in manufacturing 3D printed firearms through his @3DPrintGeneral account on X, including posts made following his employment at Polymaker that feature firearms manufactured using Polymaker filament.

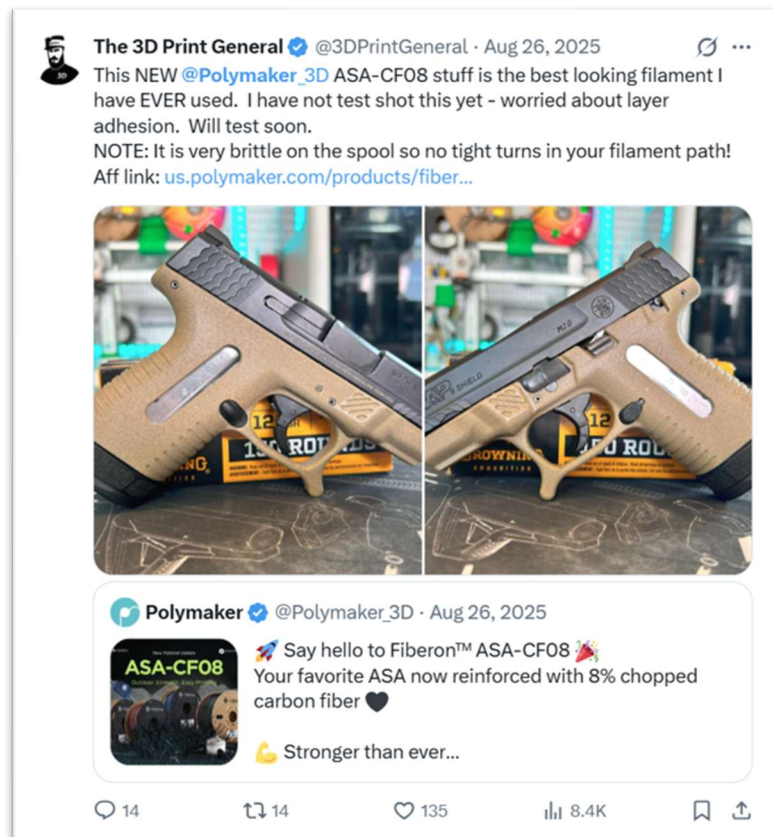


Fig. 10: Aranda Promoting Polymaker Filament through His X Account⁶⁸

⁶⁸ @3DPrintGeneral, X (Aug. 26, 2025), <https://x.com/3DPrintGeneral/status/196035863861623222?s=20> [<https://perma.cc/3U8W-FL8B>].

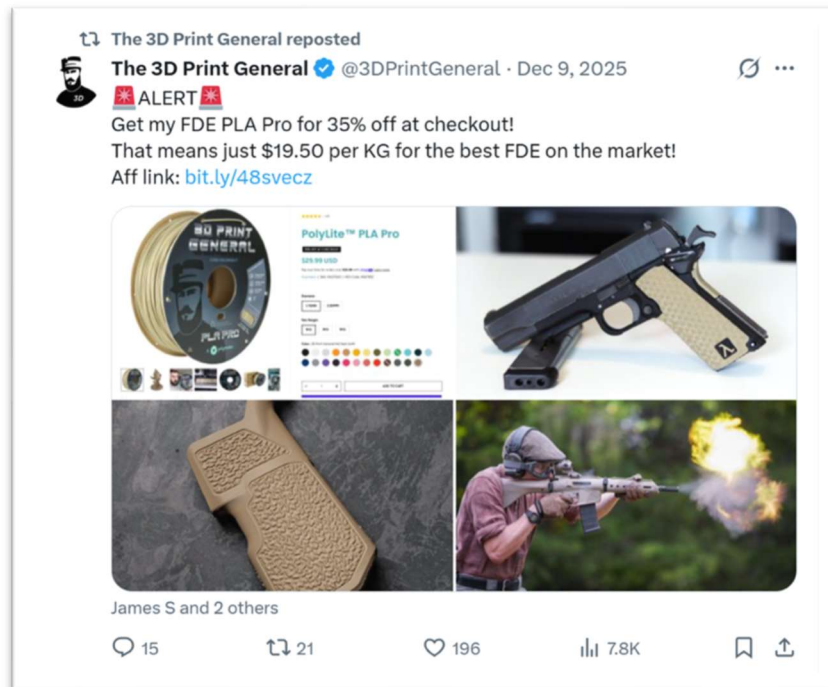


Fig. 11: Aranda promoting Polymaker products for 3D printed guns⁶⁹

66. Polymaker has profited from Aranda's role and his promotion of 3D printed ghost guns. Upon information and belief, Polymaker directs, profits from, and approves of Aranda's promotional content, and Polymaker has sanctioned Aranda's use of the company's official social media accounts for his content. Additionally, Aranda channels customers to Polymaker by promoting the company's filaments in posts on his personal 3D Print General account.

⁶⁹ @3DPrintGeneral, X (Dec. 9, 2025), <https://x.com/3DPrintGeneral/status/1998454766414823848?s=20> [<https://perma.cc/P6LY-X4H4>].

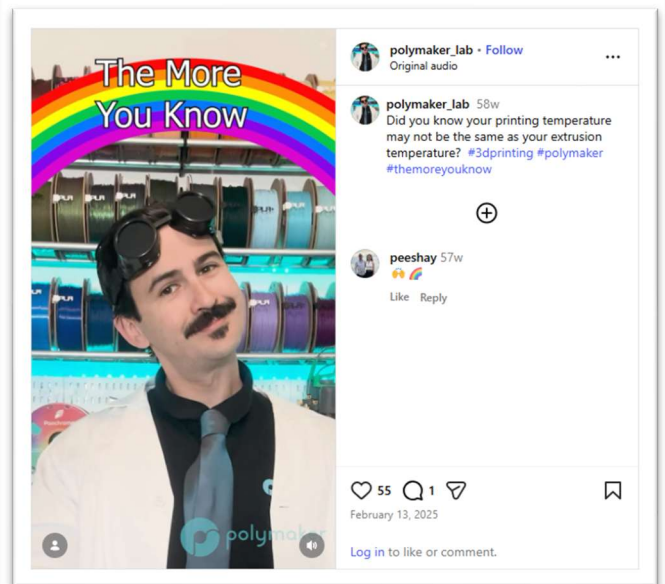


Fig. 12: Aranda posting content on 3DPrintGeneral X account and through the “polymaker_lab” Instagram account⁷⁰

67. In light of the foregoing, Polymaker hired Aranda to engage with current or potential Polymaker customers and to promote its products for use in the manufacturing of ghost guns. Polymaker did so following extensive prior engagement with Aranda, including stepping in to sponsor his YouTube channel after it was demonetized, because Polymaker “want[ed] [Aranda] to keep making content,”⁷¹ specifically content that Polymaker knew was focused on 3D printing firearms. This reflects Polymaker’s actual knowledge that Aranda’s audience consisted of consumers engaged in 3D printing guns and Polymaker’s belief that Aranda’s promotional activities on the company’s behalf would lead to additional filament sales to the 3D printing gun market.

68. Despite being on notice that 3D printing ghost guns is illegal in California, Polymaker, acting through Aranda within the scope of his role as Polymaker’s Head of Customer

⁷⁰ @3DPrintGeneral, X (Feb. 3, 2025), <https://x.com/3DPrintGeneral/status/1886536900002894246> [<https://perma.cc/YS5T-G6PY>]; @polymaker_lab, Instagram (Feb. 13, 2025), <https://www.instagram.com/p/DGGBjS2sPNI> [<https://perma.cc/XLR8-KWUA>].

⁷¹ See *supra* note 66.

1 Experience, has promoted the sale of Polymaker’s products to make illegal ghost guns through 3D
2 gun printing. Polymaker’s Aranda interviewed fellow gun influencer Reno May on an episode of
3 his podcast that aired in March 2023, and during the interview May stated explicitly that 3D printing
4 guns is, in general, illegal in California. Polymaker’s Aranda has also satirically commented on
5 then-pending California legislation to prohibit facilitating the 3D printing of firearms and reshared
6 a post announcing the filing of California’s lawsuit against The Gatalog.⁷² Polymaker markets its
7 filaments to make ghost guns through Aranda and others.

8 ***iii. Polymaker Markets Its Filament for the Specific Purpose of Manufacturing 3D***
9 ***Printed Ghost Guns***

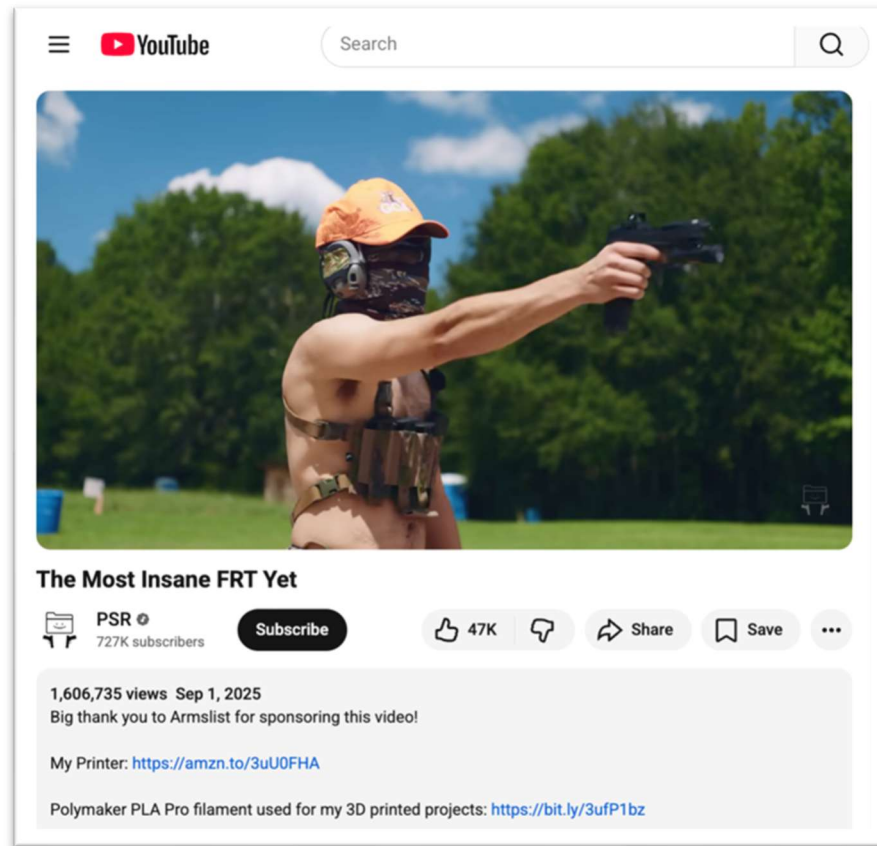
10 69. Polymaker markets its products to individuals seeking to manufacture 3D printed
11 ghost guns by establishing marketing relationships with influencers specializing in 3D printed ghost
12 gun content, as well as companies and individuals that illegally distribute DFMC.

13 70. Polymaker operates an affiliate program through which it provides certain
14 organizations and individuals with custom affiliate links to Polymaker’s product webpages.

15 71. By promoting and sharing these links with their followers, influencers earn
16 commissions on resulting sales of Polymaker’s filament. Many of the companies and individuals
17 with whom Polymaker has partnered either illegally distribute DFMC or otherwise promote the
18 manufacture of 3D printed ghost guns. For example, the YouTube channel “Print Shoot Repeat”
19 or “PSR,” with over 740,000 subscribers, posted a video in September 2025 that received over
20 1,400,000 views, featuring the description: “Polymaker PLA Pro filament used for my 3D printed
21 projects: <https://bit.ly/3ufP1bz>,” followed by, “I earn a commission from the above links.”⁷³
22
23

24 ⁷² @3DPrintGeneral, X (Feb. 18, 2026),
25 <https://x.com/3DPrintGeneral/status/2024298104661447157> [<https://perma.cc/AP9N-FC32>]
26 (reacting to proposed amendments to existing law that prohibits knowingly facilitating the 3D
27 printing of firearms); @3DPrintGeneral, X (Feb. 7, 2026),
28 <https://x.com/3DPrintGeneral/status/2020020563452768722> [<https://perma.cc/KA6V-L4FH>]
(responding “wtf” to a post discussing California’s lawsuit against The Gatalog and CTRL+Pew).
⁷³ @PrintShootRepeat, *The Most Insane FRT Yet*, YouTube (Sept. 1, 2025),
<https://www.youtube.com/watch?v=hFFTOJZrILs> [<https://perma.cc/X2MM-P5JF>].

1 Clicking on the link takes the user to the PolyLite PLA Pro filament's product page, where the
2 filament is available for purchase.



17 *Fig. 13: Polymaker Offering Creators Commission for Promoting Gun-Related Uses*⁷⁴

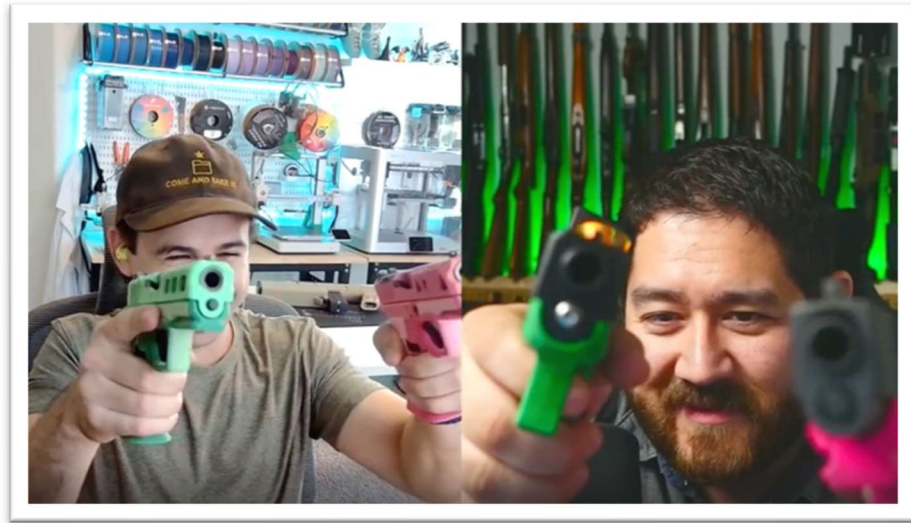
18 72. In social media posts, CTRL+Pew has promoted Polymaker filament and included
19 CTRL+Pew's custom affiliate links, provided by Polymaker, claiming that "Polymaker has some
20 of the best and most user-friendly Nylon options on the market," followed by a picture of a 3D
21 printed gun.

22 73. Polymaker's Aranda has featured CTRL+Pew's creator, Alexander Holladay, in
23 video interviews about 3D printed ghost guns on his Rumble channel, the "3D Print General."⁷⁵ In
24

25
26 ⁷⁴ *Id.*

27 ⁷⁵ 3D Printed Guns: Where Are We Now? 2025 Edition with CTRL Pew,
28 https://rumble.com/v6rgsnv-3d-printed-guns-where-are-we-now-2025-edition-with-ctrl-pew-3dpgp-ep29.html?e9s=src_v1_sa%2Csrc_v5_sa_o%2Csrc_v1_ucp_v (last visited Apr. 15, 2026) [<https://perma.cc/AJJ4-ZU64>].

1 a March 2025 interview, Polymaker’s Aranda credits Holladay as “the man who brought [him] into
2 [3D printing guns]” and as being “the man to go to if you’re like . . . I want to print a gun”⁷⁶



11 *Fig. 14: Aranda (left) and Holladay (right) pointing 3D printed pistols at each other during*
12 *March 2025 interview.*⁷⁷

13 ***iv. Polymaker’s Filaments Promoted for Printing Guns Constitute “Firearm Precursor***
14 ***Parts,” Under California Law***

15 74. Pursuant to California Penal Code § 16531(a), a “firearm precursor part” is defined
16 as including “any forging, casting, printing, extrusion, machined body or similar article . . . that is
17 marketed or sold to the public to become or be used as the frame or receiver of a functional firearm
18 once completed, assembled or converted.” Cal. Penal Code § 16531(a). Because Polymaker
19 markets and sells its filaments to the public to become or be used as the frame or receiver of a
20 functional firearm, the filaments qualify as “firearm precursor parts.” *Id.*

21 75. As discussed above, Cal DOJ has confirmed that the legal definition of firearm
22 precursor parts extends to raw materials. *See supra* Section IV.A.i. Cal DOJ’s Firearm Precursor
23 Identification Guidebook identifies the Ghost Gunner “AR-00,” which amounts to a block of
24 aluminum, as a firearm precursor part under the marketing prong of the guidelines. As sold, the
25 AR-00 has no structural feature of a firearm component, yet it satisfies the statutory definition
26 because of how AR-00 is marketed.

27
28 ⁷⁶ *Supra* note 76.

⁷⁷ *Supra* note 76.

1 76. Like the Ghost Gunner AR-00, Polymaker’s filaments meet the definition of a
2 “firearm precursor part” because of how the filaments are marketed.

3 77. Polymaker’s employed a diverse and robust marketing strategy to promote the sales
4 of its firearm precursor parts. As detailed above, Polymaker purposefully collaborated with, then
5 hired 3D gun printing influencer—Aranda—to market its firearm precursor parts—notably, it
6 created a special edition filament to be used in the manufacturing of ghost guns featuring the
7 influencer’s likeness and a gun-related slogan. The marketing strategy to drive more sales of its
8 firearm precursor parts included advertising its Fiberon and Polymaker HT-PLA Pro filaments with
9 images of 3D-printed firearms and firearm components and providing 3D gun printing social media
10 influencers with affiliate links that pay commissions to the influencers in exchange for filament
11 purchases.

12 78. Polymaker goes beyond just marketing the firearm precursor parts by providing
13 filament-related guidance on Reddit’s gun-printing forums and publishing guidance on its Wiki
14 page regarding which adhesives best bond plastic firearm components to metal parts when
15 assembling a firearm.

16 79. These business decisions reflect Polymaker’s intentional efforts to market its
17 filaments to be used to manufacture the frame or receiver of 3D printed firearms.

18 80. Again, the People do not claim that all 3D printing filament qualifies as a “firearm
19 precursor part.” Rather, the People allege that Polymaker’s filament meets the statutory definition
20 of a “firearm precursor part,” because Polymaker has made a conscious business choice to market
21 and sell its products to the public for the purpose of making 3D printed ghost guns.

22 81. The California legislature and law enforcement have devoted significant resources
23 to combat unauthorized firearms. *See supra* Sections I, IV.A.i. Polymaker’s deliberate commercial
24 strategy to market its products for use in manufacturing unserialized ghost guns directly undermines
25 those efforts. Its marketing reaches California residents and exacerbates the spread of untraceable
26 firearms in a state contending with a documented ghost gun crisis. No legitimate commercial
27 purpose could overcome the harm arising from its marketing of products specifically toward a
28 community engaged in conduct that California has outlawed.

1 **FIRST CAUSE OF ACTION**

2 **Violation of Cal. Bus. & Prof. Code § 17200 et seq. (UCL) Alleged against All Defendants**

3 82. Plaintiff hereby incorporates by reference the allegations set forth in paragraphs 1
4 through 81, as if fully set forth herein.

5 83. California's Unfair Competition Law (Business & Professions Code § 17200, *et*
6 *seq.*) prohibits any unlawful, unfair, or fraudulent business act or practice.

7 84. The People bring this cause of action under the unlawful and unfair prongs.

8 **A. Polymaker's Unlawful Acts**

9 85. ***Sale of Firearm Precursor Parts.*** Polymaker has and continues to violate
10 California Business & Professions Code § 22949.62 and California Penal Code 30400, which both
11 make it unlawful to "sell, offer to sell, or transfer ownership of any firearm precursor part . . . that
12 is not a federally regulated firearm precursor part."

13 86. Under California law, a "firearm precursor part" includes "any forging, casting,
14 printing, extrusion, machined body or similar article . . . that is marketed or sold to the public to
15 become or be used as the frame or receiver of a functional firearm once completed, assembled or
16 converted." Cal. Penal Code § 16531(a).

17 87. Polymaker has, and continues to be, engaged in an extensive business strategy to
18 market its filaments to become the frame or receiver of functional firearms, including by:

- 19 • Collaborating with 3D print influencer Sean Aranda to design, market, and sell the "3D
20 Print General" filament creator spool, which is targeted to an audience Aranda
21 cultivated through creating content about 3D printing firearms, branding the spool with
22 firearm slogans, and offering the spool in "flat dark earth" color that is popular for
23 military firearms;
- 24 • Hiring Aranda, whose online presence is heavily dedicated to promoting 3D printed
25 firearms, as Polymaker's Head of Customer Experience;
- 26 • Advertising its HT-PLA Pro filament using images of 3D printed firearms and firearm
27 accessories;
- 28

- Hosting promotional videos on its website featuring blurred images of firearms manufactured with Polymaker filament;
- Paying commissions to multiple 3D printed gun influencers and distributors of DFMC to create content promoting the use of Polymaker filament to print ghost guns and demonstrating how to manufacture firearms using Polymaker products;
- Providing technical recommendations on its website's Wiki page for the best adhesive to bond 3D printed firearm components to metal parts;
- Directly engaging with users on online gun-manufacturing forums to recommend specific Polymaker products for "building guns"; and
- Advertising its Fiberon PA612-CF15 filament with images of 3D-printed firearm components on its website.

88. Because of Polymaker's course of conduct, the filaments Polymaker markets to become frames and receivers of firearms qualify as firearm precursor parts. Polymaker's sale of these filaments violates California Business & Professions Code § 22949.62 and California Penal Code § 30400.

89. ***Aiding and Abetting Unlawful Manufacture of Firearms.*** Polymaker has also violated and continues to violate California Civil Code § 3273.625, which bars knowing facilitation of unlawful manufacture of firearms.

90. California Civil Code § 3273.625 and California Penal Code § 29186 each provide that it is unlawful to knowingly or willfully aid, abet, promote, or facilitate the unlawful manufacture of firearms. Section 3273.625(b) provides that "unlawful manufacture of firearms" shall have the same meaning as in California Penal Code § 29186(b), which expressly includes "[t]he manufacture of any firearm using a three-dimensional printer or computer numerical control (CNC) milling machine by an individual who is not licensed to manufacture firearms pursuant to California law, in violation of Section 29185."

91. Polymaker has knowingly, willfully, or recklessly aided, abetted, promoted, and facilitated the unlawful manufacture of firearms in California through its sale of firearm precursor parts to anyone in California with an internet connection.

1 92. Polymaker’s conduct was not merely passive sales of a general-purpose product.
2 Rather, Polymaker has actively facilitated, cultivated, and encouraged the unlawful manufacture of
3 ghost guns through product development, targeted marketing, strategic partnerships, and direct
4 consumer engagement.

5 93. On information and belief, Polymaker knew that (i) its conduct would directly
6 facilitate unlawful firearm manufacturing by providing the essential materials, technical guidance,
7 and promotional encouragement necessary for individuals to manufacture ghost guns in violation
8 of California law; (ii) individuals in California manufactured firearms using 3D printers without
9 the required licenses; and (iii) Polymaker’s conduct was in violation of California Penal Code
10 § 29185 and related statutes.

11 94. Polymaker’s conduct directly facilitated unlawful firearm manufacturing by
12 providing the essential materials, technical guidance, and promotional encouragement necessary
13 for individuals to manufacture ghost guns in violation of California law.

14 95. Through its actions, Polymaker has also violated and continues to violate California
15 Penal Code § 29180(f), which prohibits knowingly facilitating, aiding, or abetting the manufacture
16 or assembling of unserialized firearms, such as 3D printed ghost guns.

17 96. ***Firearm Industry Standard of Conduct.*** Polymaker’s conduct further violates
18 California’s Firearm Industry Responsibility Act (“FIRA”).

19 97. California Civil Code § 3273.50(d) defines a “firearm-related product” to expressly
20 include firearm precursor parts. Based on the definition of firearm precursor parts given under
21 California Penal Code § 16531(a), Polymaker’s filaments constitute firearm precursor parts and are
22 thus firearm-related products within the meaning of Civ. Civ. Code § 3273.50(d).

23 98. Section 3273.50 defines a “firearm industry member” as any person engaged in the
24 manufacture, distribution, importation, marketing, wholesale sale, or retail sale of firearm-related
25 products.

26 99. Polymaker manufactures, markets, distributes, and sells filaments that constitute
27 firearm-related products, under Cal. Civ. Code § 3273.50(d), and, therefore, qualifies as a firearm
28 industry member subject to the standard of conduct, codified at Cal. Civ. Code § 3273.51.

1 100. Polymaker, as a firearm industry member, is required under Cal. Civ. Code §
2 3273.51, to implement reasonable controls designed to ensure compliance with all applicable state
3 and federal laws.

4 101. Pursuant to Cal. Civ. Code § 3273.50(h)(3)'s definition of "reasonable controls,"
5 Polymaker is barred from promoting the unlawful manufacture, sale, possession, marketing, or use
6 of firearm-related products.

7 102. Polymaker is also barred, under § 3273.50(h)(1), from distributing firearm-related
8 products to persons whom Polymaker has reasonable cause to believe are at a substantial risk of
9 using a firearm-related product unlawfully.

10 103. Polymaker has not implemented such reasonable controls. Quite the contrary: rather
11 than taking steps to prevent its filament from reaching unlicensed firearm manufacturers,
12 Polymaker affirmatively avails itself of that market.

13 104. Polymaker's failure to implement the reasonable controls required by Cal. Civ. Code
14 § 3273.51, combined with its affirmative conduct promoting the unlawful manufacturing of ghost
15 guns in California, constitutes a violation of the firearm industry standard of conduct.

16 **B. Polymaker's Unfair Practices**

17 105. Polymaker's conduct is also actionable as an unfair business practice, under Cal.
18 Bus. & Prof. Code § 17200. Polymaker's knowing marketing of its filament to facilitate the
19 unlicensed manufacture of unserialized firearms constitutes a business practice whose harm to the
20 public substantially outweighs any legitimate utility.

21 106. The conduct at issue is not Polymaker's manufacturing and distribution of filament
22 in general, but rather Polymaker's actions to capture the 3D printed ghost gun market for filament
23 and profit from the unlawful manufacture of 3D printed guns in California.

24 107. Polymaker's conduct is also unfair because it is directly tethered to, and undermines,
25 California's comprehensive legislative framework prohibiting the unlicensed manufacture of
26 unserialized firearms. Polymaker's commercial strategy of hiring and sponsoring 3D printed gun
27 influencers and engaging with 3D printed gun community forums directly counteracts the purposes
28

1 those statutes were enacted to serve. A business practice that knowingly undermines an established
2 legislative public safety scheme is unfair within the meaning of Section 17200.

3 108. As a direct and proximate result of Polymaker's conduct, the public and the People
4 of the State of California have suffered harm, including increased threats to public safety and
5 additional costs related to enforcement and prevention.

6 109. As a direct and proximate result of Polymaker's unfair and unlawful conduct, the
7 People are entitled to recover all proceeds received by Polymaker arising from its unlawful 3D
8 printed gun marketing activity, pursuant to Cal. Bus. & Prof. Code § 17203, including all California
9 sales revenue causally attributable to Polymaker's influencer campaigns, community sponsorship,
10 and affiliate partnerships related to 3D printed guns.

11 110. Each day that Polymaker has marketed and sold its products to facilitate the
12 manufacture of 3D printed ghost guns in a manner accessible to California audiences constitutes its
13 own independent violation of Cal. Bus. & Prof. Code § 17200.

14 **PRAYER FOR RELIEF**

15 111. The People of the State of California respectfully request that this Court enter
16 judgment against Defendant Polymaker LLC and grant the following relief:

- 17 • That the Court orders Polymaker to disgorge all revenue acquired by means of its
18 unlawful and unfair business practices, pursuant to Cal. Bus. & Prof. Code § 17203
19 in an amount to be established according to proof;
- 20 • That the Court assess civil penalties against Polymaker of up to \$2,500 for each
21 violation of Cal. Bus. & Prof. Code § 17200, pursuant to § 17206, with each day on
22 which Polymaker has marketed its filament for 3D printed guns in a manner
23 accessible to California audiences constituting an independent violation;
- 24 • That the Court issue injunctive relief, as may be necessary to prevent Polymaker
25 from engaging in any act or practice constituting unlawful conduct, as described
26 herein within the meaning of Cal. Bus. & Prof. Code § 17200;

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- That the Court issue injunctive relief, as may be necessary to prevent Polymaker from engaging in any act or practice constituting unfair conduct, as described herein within the meaning of Cal. Bus. & Prof. Code § 17200;
- That the People recover their reasonable attorney’s fees and costs of suit; and,
- That the Court award such other and further relief as it deems just and proper.

1 DATED: October 5, 2026

Respectfully submitted,

2
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