Lycurgan, Inc. Ares Armor

208 N Freeman St

Oceanside, CA 92054

**TO: Whom It May Concern**

**FROM: Dimitrios Karras, CEO Ares Armor**

**SUBJ: Temporary Restraining Order Against BATFE**

**DATE: March 12, 2014**

Sir or Ma’am,

Last week the BATFE Raided EP Armory based on a determination letter that had deemed the 80% Polymer product to be a firearm. The determination letter that the BATFE used to obtain warrants against EP Armory is based on incorrect information about the manufacturing process. The BATFE has been notified of their error and the incorrectness of their determination based on this error.

This week on Monday, March 10th the BATFE threated to raid us even though they are fully aware that their determination letter is factually incorrect. They requested that we turn over a list of every customer that had purchased a polymer lower from us and turn over the remaining inventory that we have.

Our customer’s privacy is of the utmost importance to us. I cannot in good moral conscience turn over a list of names to the BATFE just because they unduly threaten us with an unjust raid based on information they KNOW TO BE FALSE!

For the time we are SAFE! We were granted a Temporary Restraining Order against the BATFE on March 11th.  The following is the declaration that I made during the process of obtaining this TRO:

------------------------------------------------------------------------------------------------------------------------------------------

Declaration of Dimitrios Karras, CEO Ares Armor

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

I, Dimitrios Karras, state:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Executed March, 10, 2014 Oceanside, CA

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

Dimitrios Karras

------------------------------------------------------------------------------------------------------------------------------------------

Sincerely,

Dimitrios Karras, CEO Ares Armor