



December 6, 2021

CEO Susan Wojkicki
YouTube
901 Cherry Ave
San Bruno, California 94066 USA

Re: Videos on YouTube Demonstrating How to Make a Ghost Gun

Dear Ms. Wojkicki:

On behalf of the Everytown for Gun Safety Support Fund (“Everytown”), the education, research and litigation arm of Everytown for Gun Safety, the largest gun violence prevention organization in the country with over six million supporters,¹ I write to alert YouTube of various violations of its Community Guidelines with respect to firearms.

As you know, technology platforms, such as YouTube, have a responsibility to users and the public at-large to ensure that posts do not incite violence or promote extremist content. In fact, YouTube’s own Community Guidelines speak to this, explicitly restricting posts that sell firearms or provide instructions on manufacturing firearms. As described herein, Everytown has found a variety of videos on YouTube that clearly violate these guidelines, including videos about unserialized, do-it-yourself firearms that circumvent federal and state laws (commonly referred to as “ghost guns” due the inability of law enforcement to trace such weapons). The videos highlighted in this letter are not outliers; they collectively have been viewed over 5.7 million times on YouTube. The vast majority of the videos have been left up on the platform for over two years, with some dating back as far as 2015.

Everytown requests that YouTube take immediate action to strengthen enforcement of its Community Guidelines with respect to ghost guns and, specifically, to remove content regarding the construction or sale of ghost guns. We acknowledge that YouTube has relatively strong Community Guidelines on this issue, but to meet the fast-growing public safety threat posed by ghost guns, it is urgent that the company’s content moderation and removal practices match these guidelines. Everytown stands ready to assist YouTube in keeping its platform safe from ghost guns and to lend its expertise to the company on these issues.

I. YouTube Firearms Policy and the Danger of Ghost Guns

A “ghost gun” is a do-it-yourself (DIY), homemade firearm assembled from easy-to-obtain building blocks that can be purchased without any background checks or restrictions. These guns are made by an individual, not a federally licensed manufacturer or

¹ The Everytown Support Fund seeks to improve our understanding of the causes of gun violence and help to reduce it by conducting groundbreaking original research, developing evidence-based policies, communicating this knowledge to the American public, and advancing gun safety and gun violence prevention in communities and the courts. Learn more at www.everytownsupportfund.org.



importer. Several companies currently offer so-called “80-percent-finished” frames and receivers—as well as the necessary parts, tools, and instructions—that, with little time and effort, allow individuals—including those who could never legally purchase a gun—to create complete firearms at home without serial numbers, making them virtually untraceable. This is what makes ghost guns so dangerous, and it’s why they have become the fastest-growing gun safety problem facing our country today.²

Ghost guns, especially those using unserialized frames and lower receivers made by Polymer80, the largest manufacturer in this arena, have increasingly been recovered by law enforcement at crime scenes throughout the United States. To give just one example: In 2020, the FBI arrested three members of the white supremacist group The Base who were allegedly planning violence ahead of a gun rights rally in Richmond, Virginia. The FBI seized several weapons, including an unserialized ghost gun.³ According to the Bureau of Alcohol, Tobacco, Firearms, and Explosive (ATF), “From January 1, 2016, through December 31, 2020, there were approximately 23,906 suspected [ghost guns] reported to ATF as having been recovered by law enforcement from potential crime scenes, including 325 homicides or attempted homicides.”⁴ While law enforcement agencies like the FBI and ATF are working to curb this problem, it is imperative that YouTube work harder and smarter to monitor and regulate ghost-gun-related content.

A. 80% Receivers

The company’s own guidelines are crystal clear on the issue: “**Content intended to sell firearms, instruct viewers on how to make firearms, ammunition, and certain accessories, or instruct viewers on how to install those accessories is not allowed on YouTube.**”⁵ One of the “examples of content that isn’t allowed” is “**showing users step-by-step instructions on how to finish a lower receiver in order to complete fabrication of a firearm.**” Thus, the guidelines would certainly apply to posted videos instructing individuals how to put together a ghost gun with 80-percent-finished frames and receivers.

Yet YouTube is full of such videos. The following list provides just a handful of examples of videos that clearly violate the Community Guidelines, drawn from a non-exhaustive review of content on the platform. We note that the titles of these widely watched videos are not particularly subtle, including “Glock Pro Frame Assembly,” “The Complete Build,” and “How to Mill and Finish a Polymer 80 Glock 19 Lower,” among others.

² See Everytown Research, “Untraceable: The Rising Specter of Ghost Guns,” *available at* <https://everytownresearch.org/report/the-rising-specter-of-ghost-guns/>.

³ See Everytown Press Release, “Ghost Guns: A Weapon of Choice of White Supremacists Arrested Ahead of Virginia Rally,” January 27, 2020, *available at* <https://www.everytown.org/press/ghost-guns-a-weapon-of-choice-for-white-supremacists-arrested-ahead-of-virginia-rally/>.

⁴ ATF, “Definition of ‘Frame or Receiver’ and Identification of Firearms,” May 21, 2021, *available at* <https://www.federalregister.gov/documents/2021/05/21/2021-10058/definition-of-frame-or-receiver-and-identification-of-firearms>.

⁵ YouTube’s firearms policy can be found at <https://support.google.com/youtube/answer/7667605?hl=en>.



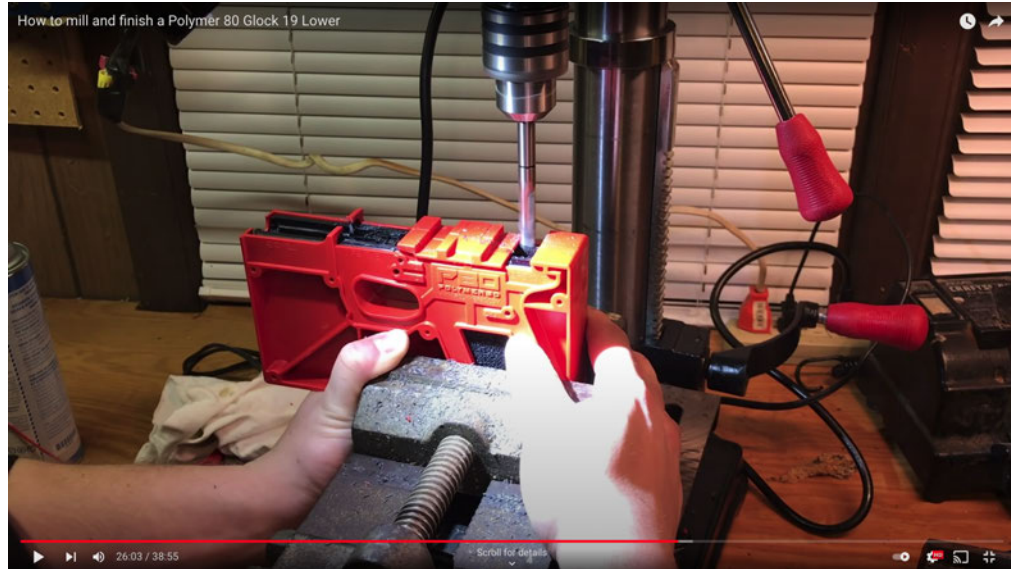
1. **“Spectre Polymer80,”** posted August 2, 2016, by GlockStore, with a current view count of more than 680,000. The video offers instructions to complete an unserialized Polymer80 pistol frame.
https://www.youtube.com/watch?v=_b8wgnI7_t4&ab_channel=GlockStore
2. **“Polymer 80 Glock Pro Frame Assembly,”** posted June 30, 2019, by MarineGunBuilder, with a current view count of nearly 597,000. This is another video offering instructions to complete an unserialized Polymer80 pistol frame.
https://www.youtube.com/watch?v=wHIYQIRB-3Q&ab_channel=MarineGunBuilder



3. **“Stealth Arm 1911 Phantom Jig - No Mill Needed,”** posted April 12, 2015, by MosinVirus, with a current view count of nearly 463,000. The video offers instructions to complete an unserialized 1911-style pistol frame.
https://www.youtube.com/watch?v=7FNSU_BVMmA&ab_channel=MosinVirus
4. **“SS80 - The Complete Build, Part 1,”** posted September 14, 2018, by SS80 (part of GlockStore), with a current view count of nearly 419,000. This video offers instructions to complete an unserialized SS80 pistol frame.
https://www.youtube.com/watch?v=KEc_BbA9NcE&ab_channel=SS80
5. **“Polymer 80 Glock Build How to Get Perfect Pins,”** posted June 1, 2019, by MarineGunBuilder, with a current view count of nearly 314,000. Again, this video shows viewers how to complete an unserialized Polymer80 pistol frame.
https://www.youtube.com/watch?v=BLMdZSeEybM&ab_channel=MarineGunBuilder
6. **“Polymer 90 Glock 19 Pro Build - P80 Channel,”** posted June 3, 2019, by MarineGunBuilder, with a current view count of more than 290,000. This video offers instructions to finish an unserialized Polymer80 pistol frame.
https://www.youtube.com/watch?v=WvDu5MqMGNM&ab_channel=MarineGunBuilder



7. **“How to Mill and Finish a Polymer 80 Glock 19 Lower,”** posted March 18, 2017, by P3 Tactical, with a current view count of more than 241,000. The video offers a step-by-step tutorial for finishing an unserialized Polymer80 pistol frame.
https://www.youtube.com/watch?v=JEOCcLu4sr0&ab_channel=P3Tactical



8. **“ULTIMATE: Polymer 80 Glock Troubleshooting Guide,”** posted April 19, 2019, by Tactical Toolbox, with a current view count of more than 237,000. This video offers instructions so viewers can troubleshoot and fix faulty pistols crafted using unserialized Polymer80 pistol frames.
https://www.youtube.com/watch?v=MKNtvcw-K-g&ab_channel=TacticalToolbox
9. **“Easiest, Polymer80 pf940sc Glock 26, Rock Slide USA, Lone Wolf, #p80 #glock26 #glock #glockbuild,”** posted September 25, 2018, by Delta D80, with a current view count of nearly 228,000. Like many of these examples, the video offers instructions to complete an unserialized Polymer80 pistol frame.
https://www.youtube.com/watch?v=Crszvpjszck&ab_channel=DeltaD80
10. **“Finishing the Polymer80 PF940 V2,”** posted October 20, 2017, by “shooting tips and tricks”, with a current view count of more than 218,000. The video offers instructions to finish an unserialized Polymer80 pistol frame.
https://www.youtube.com/watch?v=HuFY5E8EHAE&ab_channel=shootingtipsandtricks

B. 3D-Printed Guns

Unserialized ghost guns also include those crafted with the help of 3D printers. In recent years, some have attempted to master 3D printing to fabricate weapons, either in part or whole, as well as magazines and other accessories to thwart gun laws. This trend is incredibly concerning because, as with an “80-percent” frame or receiver, it allows potentially dangerous or

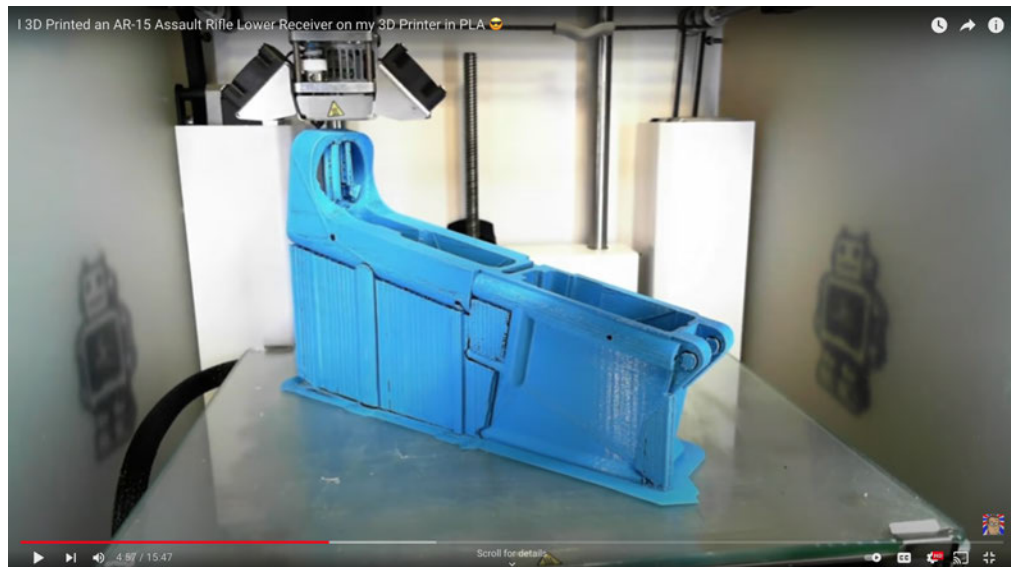


prohibited individuals to manufacture and own untraceable weapons without serial numbers or background checks. In addition, today’s 3D-printed firearms can be unsafe because they are mostly composed of plastic and are typically developed by amateurs. But most troubling would be the fact that they often look like toy guns—something 3D gun printers intentionally exploit.

YouTube’s Community Guidelines prohibiting “content intended...to instruct viewers on how to make firearms” would plainly apply to the use of 3D printers to make firearms or firearms parts. Nonetheless, the following list provides a number of examples of videos related to 3D-printed guns that clearly violate the Community Guidelines, drawn from a non-exhaustive review of content on the platform.

1. **“I 3D Printed an AR-15 Assault Rifle Lower Receiver on my 3D Printer in PLA,”** posted May 29, 2015, by Barnacules Nerdgasm, with a current view count of more than 1.4 million. This video takes viewers through all the necessary steps to 3D-print an AR-15 lower receiver.

https://www.youtube.com/watch?v=PCbYBF5E3rc&ab_channel=BarnaculesNerdgasm



2. **“How to 3D Print a Gun - Q&A And Information,”** posted December 16, 2020, by Booligan Shooting Sports, with a current view count of more than 285,000. This video provides instructions to start 3D gun printing.
https://www.youtube.com/watch?v=pR1O8DZZyeI&ab_channel=BooliganShootingSports
3. **“Make Glocks Fun Auto’ Glock autosear,”** posted April 30, 2020, by CTRLPew, with a view count of more than 204,000. Of additional note, this video includes a hyperlink at the bottom that provides instructions for 3D printing an “auto sear” for a Glock pistol, turning it into a machine gun—which is illegal.

https://www.youtube.com/watch?v=2WDETRB7gXs&ab_channel=CTRLPew



4. **“Glock 17 3D Printed,”** posted September 22, 2021, by The 3D Print General, with a view count of over 65,000. This video takes viewers through the steps to build a Glock 17 using an unserialized 3D-printed frame.
https://www.youtube.com/watch?v=-Ey2rGjSmH8&ab_channel=The3DPrintGeneral
5. **“Getting Started - What Printer Should I Buy,”** posted February 16, 2021, by CTRLPew, with a view count of more than 52,000. The video takes viewers through all of the steps required to get into 3D gun printing.
https://www.youtube.com/watch?v=HzCw2ccRhJI&ab_channel=CTRLPew

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Everytown for Gun Safety requests that YouTube (1) take immediate action on the specific issues enumerated in this letter with respect to content that provides viewers with instructions to build their own firearms, including ghost guns and 3D-printed weapons; and (2) revise its content moderation practices in these areas to root out existing similar content on YouTube, and ensure no new videos—violative of your own policies—end up on the platform again. We believe focused attention on these issues can save lives.

As the country’s largest gun violence prevention organization, Everytown stands ready to assist YouTube in keeping its platform safe. We have expertise in ghost guns, 3D-printed guns, and other topics related to firearms and extremism. I can be reached at [REDACTED], and would appreciate the opportunity to open a dialogue with YouTube on these issues.

Sincerely,

Justin Wagner
Senior Director, Investigations
Everytown for Gun Safety Support Fund