

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

-against-

CRAIG FREEMAN,
CO-DEFENDANT,

Defendants.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1), committed as follows:

The defendants in the County of New York and elsewhere, during the period from on or about May 14, 2022, to on or about January 13, 2023, with intent that conduct constituting the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** be performed, said crime being a class “C” felony, agreed with each other, and with others, to engage in and cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from on or about May 14, 2022, to on or about January 13, 2023, the following overt acts, among others, were committed in New York County, and elsewhere:

1. On or about May 14, 2022, defendant **CO-DEFENDANT1** ordered on Amazon.com, Inc., a 3D printer, to wit, an “Official Creality Ender 3 Pro 3D Printer with Removable Build Surface Plate and Branded Power Supply, FDM 3D Printers for DIY Home and School Printing Size 8.66x8.66x9.84 inch.”
2. On or about May 14, 2022, defendant **CO-DEFENDANT1** ordered on Amazon.com, Inc., 3D printer filament, to wit, “Polymaker PLA PRO Filament 1.75mm Blue, Powerful PLA Filament 1.75mm 3D Printer Filament 1kg - PolyLite 1.75 PLA Filament PRO Tough & High Rigidity 3D Printing PLA Filament Blue.”
3. On or about July 11, 2022, defendant CRAIG FREEMAN sent defendant **CO-DEFENDANT1** a text message containing a video of a 3D printer printing a blue circular plastic object, and further sent defendant **CO-DEFENDANT1** a text message stating in substance, “It’s fire...I’m about to go crazy.”
4. On or about July 11, 2022, defendant **CO-DEFENDANT1** sent defendant CRAIG FREEMAN a series of text messages that in substance stated, “I told you...build some hot shot...Ima send u the files...bro you gonna love it...Ima take my printer on vacation with me lol.”

5. On or about July 21, 2022, defendant CRAIG FREEMAN sent defendant **CO-DEFENDANT** a text message that in substance stated, “Think I’m good had to change printer settings will let u know twm.”
6. On or about July 22, 2022, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN a text message containing a zip file entitled in substance, “glock-26-gen-5-custom-prop-1.snapshot.5.”
7. On or about July 22, 2022, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN text message containing a zip file entitled in substance “The Harlot,” containing STEP and STL files, bearing names such as, “Ammo Storage Clip,” “Breech Block,” “Ejector Rod,” “Grip Spacer,” “Hammer,” “Latch,” “Left Side Frame,” “Right Side Frame,” “Snub Barrel,” “Trigger,” and “UFA Compliant Grip Spacer,” and also contained a txt file from db-firearms.com, that stated in substance at the top, “So you want to build a Harlot? Good choice...the Harlot is a very simple and effective pistol to build. She is a single shot, break action, derringer type .22LR pistol...designed to be strong, safe, and reliable... Have fun, be safe, and always, ALWAYS, be free.” The txt file further went on to provide a list of tools and 3D printer settings needed for construction, a parts list, additional information “notes” for construction, various links for additional parts, a link to the Harlot firearm kit from db-firearms.com, and a youtube.com link under the heading of “Build Tutorial.”

8. On or about July 23, 2022, defendant CRAIG FREEMAN ordered on eBay, Inc., a firearm parts kit, to wit a “Glock 17 by PATMOS Arms Judah Slide - G17/PF940v2 - Barrel and 2 Parts Kits.”
9. On or about July 23, 2022, defendant CRAIG FREEMAN ordered on eBay, Inc., a firearm part, to wit, a “Glock Factory Magazine OEM for Glock 17 / 34 G17 Full Size - 9MM -10 round -NEW.”
10. On or about July 25, 2022, defendant CRAIG FREEMAN ordered on eBay, Inc., a firearm part, to wit, a “GLOCK FACTORY OEM 17 20 21 22 24 31 34 35 AMBI 37 GEN 3-4 LOCKING BLOCK 3 PIN.”
11. On or about July 27, 2022, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN a text message containing a video of a blue lower receiver in the process of being 3D printed, and defendant CRAIG FREEMAN responded in substance, “Nice u back in the game.”
12. On or about July 27, 2022, defendant CRAIG FREEMAN sent defendant **CO-DEFENDANT** a photo of a completed 3D printed white plastic lower receiver, and sent a text message that stated in substance, “took the supports off – easy.”
13. On or about July 28, 2022, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN a text message containing the following link:
[https://ghostguns.com/product/3d-print/3d-files/handgun-collection/.](https://ghostguns.com/product/3d-print/3d-files/handgun-collection/)”

14. On or about July 29, 2022, defendant **CO-DEFENDANT** ordered on Amazon.com, Inc., a second 3D printer, to wit, a “Flashforge 3D Printer Adventurer 3 Pro with 2 Removable Nozzle, Glass Bed and Leveling-Free, Fully Assembled, High Precision Printing with PLA/ABS/PETG/PLA-CF/PETG-CF.”
15. On or about August 2, 2022, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN a text message that stated in substance, “where the clip.”
16. On or about August 2, 2022, defendant CRAIG FREEMAN responded to defendant **CO-DEFENDANT**’s August 2, 2022 text message with another text message that stated in substance, “It’s in there.”
17. On or about August 2, 2022, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN a text message that stated in substance, “Ima send the file so you can put the switch in it,” referring to a “glock switch” part that can be 3D printed to turn a semi-automatic glock-style pistol fully automatic.
18. On or about August 4, 2022, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN a text message that contained a zip file entitled, “Glock Auto Switch,” which in turn contained three STL files entitled, “disconnecter,” “sear,” and “selector switch,” which are all the digital files needed to create a fully functional “glock switch.”

19. On or about August 4, 2022, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN a text message that stated in substance, “I’m sending you another on hold on” and then sent a second message containing a zip file entitled “STL,” that in turn contained two STL files entitled, “Big-Point Final v1,” and “Big-Point Final_Sight Mount v.1.”
20. On or about August 4, 2022, defendant CRAIG FREEMAN ordered on eBay, Inc., a firearm parts kit, to wit, a “Glock26 Gen3 Lower Parts Kit LPK G26 Upper Slide Completion kit UPK 9mm complete.”
21. On or about August 4, 2022, defendant CRAIG FREEMAN ordered on eBay, Inc., a firearm part, to wit, a “Barrel for Glock 26 9mm Nitride Finish, USA Made.”
22. On or about August 4, 2022, defendant CRAIG FREEMAN ordered on eBay, Inc., a firearm part, to wit, a “Factory New 9mm Black Stainless Slide for Glock 26 G26 Gen 1 2 3 4.”
23. On or about August 4, 2022, defendant CRAIG FREEMAN ordered on eBay, Inc., a firearm part, to wit, a “Glock 26, 27, Locking Block | Brand New | Gen 3/4.”
24. On or about August 5, 2022, defendant CRAIG FREEMAN sent defendant **CO-DEFENDANT** a text message that contained an STL of a lower receiver that was entitled in substance, “FMDA G26.2 V1.17 Frame,” and sent further text messages that stated in substance, “Printing it now... Let U know if the size is good.”

25. On or about August 5, 2022, defendant CRAIG FREEMAN ordered on eBay, Inc., a firearm parts kit, to wit, a “FMDA DIY Steel Glock 19 Rails.”
26. On or about August 5, 2022, defendant CRAIG FREEMAN ordered on eBay, Inc., a firearm parts kit, to wit, an “FMDA DD26.2 Rail Kit (Glock 26).”
27. On or about August 5, 2022, defendant CRAIG FREEMAN ordered on eBay, Inc., firearm parts, to wit, “DIY Steel Glock 17 Rails.”
28. On or about August 6, 2022, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN a text message that contained a zip file entitled in substance “Glock-17-gen-3-prop-1.snapshot.3,” that contained five jpeg files of digitally rendered images of a handgun, and STL files of various firearm parts, including ones entitled in substance, “9mm bullet,” “backplate,” “barrel,” “extractor plunger,” “extractor,” “firing pin plunger,” “firing pin safety,” “firing pin,” “frame,” “front rails,” “front rails pin,” “front sight,” “locking block pin,” “locking block,” “mag plate,” “mag release,” “magazine body (17),” “magazine follower,” “magazine insert,” “rear sight,” among other files.
29. On or about August 6, 2022, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN a series of text message messages that stated in substance, “...we can make some serious bank...check other parts...like the small ones,” to which defendant CRAIG FREEMAN replied, “copy.”

30. On or about August 10, 2022, defendant **CO-DEFENDANT** ordered on Amazon.com, Inc., a third 3-D printer, to wit, a “Flashforge Adventurer 4 3D Printer Leveling-Free with Quick Removable High Temp Nozzle Large 3D Printer Built-in HD Camera and HEPA13 Air Filter, 220x200x250mm Printing Size.”
31. On or about August 11, 2022, defendant CRAIG FREEMAN ordered on eBay, Inc., a firearm part, to wit, a “Glock SP05446 OEM Part Slide Lock Spring For Glock 17 20 21 22 31 34 35 37 41.”
32. On or about August 11, 2022, defendant CRAIG FREEMAN ordered on eBay, Inc., a firearm parts kit, to wit, a “Glock OEM 287 Gen 3 Magazine Catch Release 17 19 26 22 23 27 SP00287.”
33. On or about August 15, 2022, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN a text message containing an image of a firearm with a blue plastic 3D printed lower receiver.
34. On or about August 15, 2022, defendant CRAIG FREEMAN sent defendant **CO-DEFENDANT** a text message containing an image of a firearm with an orange plastic 3D printed lower receiver.
35. On or about August 17, 2022, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN text messages that stated in substance, “U want the machine????”

36. On or about August 17, 2022, defendant CRAIG FREEMAN sent defendant **CO-DEFENDANT** a text message that stated in substance, “I ordered one already.”
37. On or about November 20, 2022, defendant **CO-DEFENDANT** ordered on Amazon.com, Inc., 3D printer filament, to wit, “OVERTURE PLA Plus (PLA+) Filament 1.75mm PLA Professional Toughness Enhanced PLA Roll, Cardboard Spool, Premium PLA 1kg(2.2lbs), Dimensional Accuracy 99% Probability +/- 0.03mm (Digital Blue).”
38. On or about January 7, 2023, defendant **CO-DEFENDANT** sent defendant CRAIG FREEMAN a text message that contained an image of a black firearm part bearing an engraving that says in substance, “R Guns...Cal. 5.56mm...M0D.TRR15...A556-23242.”
39. On January 13, 2023, defendant CRAIG FREEMAN turned in an operable firearm with an orange plastic 3-D printed lower receiver to a police precinct in Kings County and asked a police officer known to the Grand Jury for a financial reward for turning in this firearm.

SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CRAIG FREEMAN of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of Penal Law § 265.01-b(1), committed as follows:

The defendant CRAIG FREEMAN, in the County of New York and elsewhere, on or about January 13, 2023, possessed a firearm.

ALVIN L. BRAGG, Jr.
District Attorney

Filed:

NA

No.

THE PEOPLE OF THE STATE OF NEW YORK

-against-

CRAIG FREEMAN
CO-DEFENDANT

Defendants.

INDICTMENT

CONSPIRACY IN THE FOURTH DEGREE, P.L. § 105.10(1), DEFS. C. Freeman, **CO-DEFENDANT**
CRIMINAL POSSESSION OF A FIREARM, P.L. § 265.01-b(1), DEF. C. Freeman

ALVIN L. BRAGG JR., District Attorney

A True Bill
Foreman

Michael Kelley
Trial Bureau 70