

August 16, 2022

Raj Subramaniam
President, CEO, and Director
Federal Express
942 S. Shady Grove Rd
Memphis, TN 38120

Dear Mr. Subramaniam:

On behalf of Giffords Law Center to Prevent Gun Violence and Bryan Muehlberger, I write to urge Federal Express (“FedEx”) to adopt and publicly affirm that it has a policy of refusing to ship dangerous firearm products that are fueling the epidemic of gun violence in America. Popularly known as “ghost guns,” the products we urge FedEx not to ship are the component parts used to produce untraceable firearms that are widely sold – without background checks – to minors, criminals, and others who cannot legally possess them. Other carriers appropriately decline to ship products sold by ghost gun companies, and it is in both FedEx’s interest and the interest of public safety for the company to do the same.

A socially responsible shipping company should not do business with irresponsible companies whose unethical and often unlawful business practices fuel American gun violence. Ghost gun companies sell firearms in partially complete form and they are then assembled by the purchaser, often in less than one hour. Ghost gun sellers have taken the position that traditional requirements for selling firearms – like background checks and serial numbers – do not apply to them, because their guns are sold as separate components rather than completed guns and the final assembly is performed by a private individual.

These companies’ assertion that their guns should not be treated as firearms under federal law because they come in pieces – and therefore, not subject to background checks, serialization, and record-keeping requirements – is absurd. It is akin to asserting that a boxed cake mix should not be subject to the same U.S. Department of Agriculture regulations as a frozen cake, merely because the oil, water, and eggs must be added at home. Putting together the components of a ghost gun is similarly simple to making a cake from a mix, and can be done in minutes with common household tools. Instructional videos on YouTube for the process have been viewed millions of times. Yet ghost gun companies refuse to comply with other critical laws pertaining to the sale of

firearms. They do not serialize their products, which means that the guns built from them cannot be traced by law enforcement. They do not retain any records of the sale. They do not perform background checks. Many of them do not even have a license to deal in firearms.

These easily obtained and untraceable guns pose a rapidly growing threat to public safety. Records from the Bureau of Alcohol, Tobacco, Firearms and Explosives indicate that between January 1, 2016 and December 31, 2021, more than 45,000 such firearms were recovered from potential crime scenes.

It is easy to acquire ghost guns online. They cannot be traced by law enforcement and often cannot be detected by metal detectors. They are a simple and obvious way for those who are legally prohibited from owning firearms to acquire them without consequence, and they are known to be increasingly used by gun trafficking rings. Most devastatingly, they are known to have been the weapon used in multiple mass shootings, causing unspeakable tragedy. Disturbingly, as Bryan Muehlberger documented [in the Washington Post](#), his daughter Gracie was murdered at her high school by a teen-aged classmate wielding a ghost gun. While grieving his daughter's death, Mr. Muehlberger was able to order a ghost gun in her name (despite using a credit card in a different name, his own.) The company accepted the order and delivered the kit addressed to his daughter, despite the fact that she had been killed and that, had she still been alive, she would have been far too young to legally purchase a gun.

Other shipping carriers, recognizing the danger posed by ghost guns, have modified their policies and no longer do business with the ghost gun industry or ship their products. In June 2022, United Parcel Service ("UPS") Customer Compliance contacted a number of ghost gun manufacturers, and terminated their accounts. More than a month ago, on July 8, 2022, UPS publicly confirmed that it will no longer ship parts for unserialized firearms. UPS's statement clarified that "the company does not accept any firearms, frames or receivers [gun components], or partially complete, disassembled, or nonfunctional frames or receivers . . . unless those items have been identified and given a serial number in compliance with federal requirements." UPS's stance reflects the values held by most Americans, specifically their desires to be safe and secure in their communities. FedEx should affirm that it upholds these same values and makes the same commitment to refrain from shipping unserialized ghost gun parts. Ghost gun manufacturers are known to be irresponsible actors employing questionable business practices with deadly irreversible consequences. FedEx should not choose to do business with these companies.

We know that FedEx is attuned to the dangers of deadly weapons being in the hands of individuals who should not be permitted to access them. Most Americans, enraged by the proliferation of mass shootings in our country, know that something needs to be done. FedEx is well positioned to help address this threat to public safety.

I would be happy to discuss this matter with a FedEx representative, or to provide additional information or answer any questions. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Skaggs", with a long horizontal flourish extending to the right.

J. Adam Skaggs
Chief Counsel & Policy Director
Giffords Law Center to Prevent Gun Violence
askaggs@giffords.org | 917-680-3473

cc: Mark Allen