



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Martinsburg, WV 25405

www.atf.gov

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Strike Industries
2842 S. Fairview ST
Santa Ana, CA 92704

Dear (b) (6)

This refers to your correspondence and accompanying sample to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), which accompanied a sample of your company's "Strike Industries Stabilizer." You asked if attaching the brace to an AR-type pistol would cause the pistol to be classified as a "rifle" and thus a firearm subject to regulation by the National Firearms Act (NFA), specifically, 26 U.S.C. § 5845(a).

As background to your inquiry, the following review of definitions provided in Federal statutes and implementing regulations should be useful:

The Gun Control Act of 1968 (GCA), 18 U.S.C. § 921(a)(29), defines "handgun," in part, as *...a firearm which has a short stock and is designed to be held and fired by the use of a single hand...*

A regulation implementing the GCA, 27 CFR § 479.11, defines "pistol" to mean *...a weapon originally designed, made, and intended to fire a projectile (bullet) from one or more barrels when held in one hand, and having (a) a chamber(s) as an integral part(s) of or permanently aligned with, the bore(s); and (b) a short stock designed to be gripped by one hand and at an angle to and extending below the line of the bore(s).*

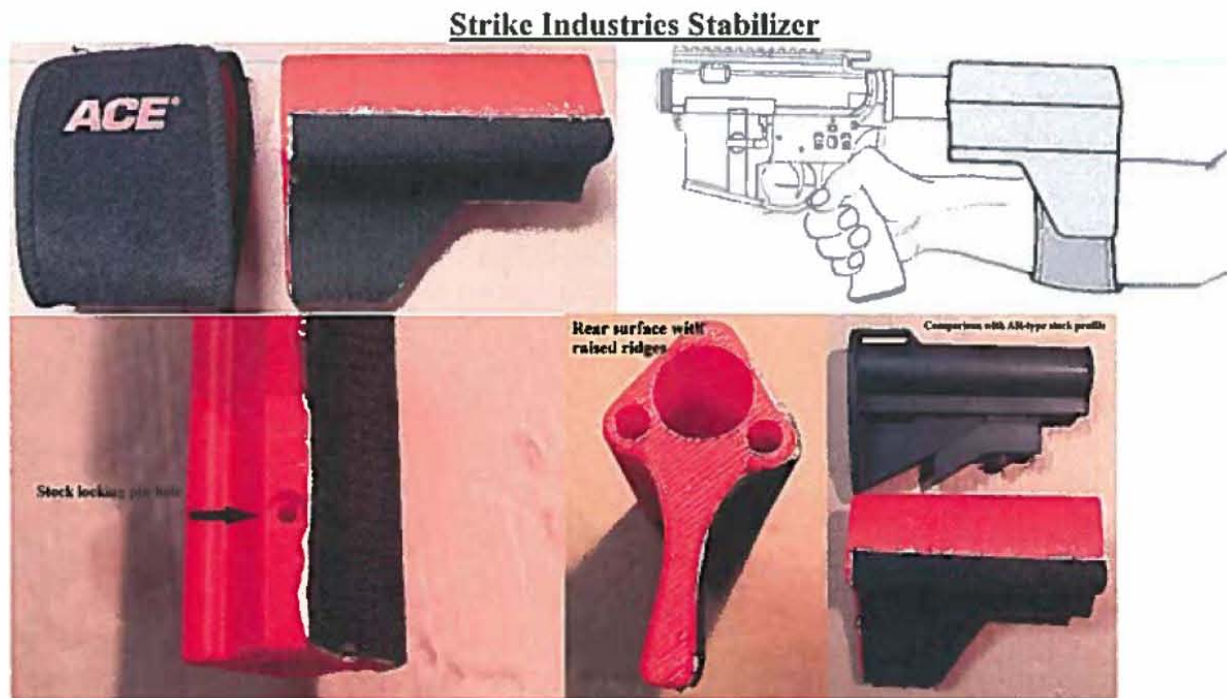
The GCA, 18 U.S.C. § 921(a)(7) defines the term "rifle" as *...a weapon designed or redesigned, made or remade, and intended to be fired from the shoulder and designed or redesigned and made or remade to use the energy of an explosive to fire only a single projectile through a rifled bore for each single pull of the trigger.*

The NFA, 26 U.S.C. § 5845(a), defines "firearm" to include ... (3) *a rifle having a barrel or barrels of less than 16 inches in length ... and, (4) a weapon made from a rifle if such weapon as modified has an overall length of less than 26 inches or a barrel or barrels of less than 16 inches ...*

According to your correspondence, the "Strike Industries Stabilizer" is comprised of three major components:

1. Hard plastic shell designed to be attached to an AR-type pistol extension or "buffer" tube.
2. Velcro hook fastener surface glued to the plastic shell.
3. ACE Wrist Support that adheres to the Velcro hook fastener surface on the shell.

Further, your description of the system states that it is intended to increase safety, stability and control "*during one-handed operation*" of AR-type pistols and "*is neither designed, nor intended for a user to fire a pistol from the shoulder.*"



As you know, shoulder stocks normally attach to the receiver of a shoulder-fired firearm. However, in the case of an AR-type, it attaches to the receiver extension, commonly referred to as the "buffer tube." A shoulder stock provides a means for the shooter to support the firearm and easily aim it when fired from the shoulder. With respect to the submitted device, you claim it is an accessory attachment designed to enhance the stability of an AR-type pistol by attaching to the operator's forearm. Stabilizing forearm braces generally would not change a pistol's classification to a "short-barreled rifle" because they do not design or redesign the firearm to be fired from the shoulder.

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FTISB finds that the Strike Industries Stabilizer consists of a rifle stock, with Velcro attached, and an ACE wrist support. The stock is designed to be attached to an AR-type receiver extension or "buffer tube" and has several characteristics of a typical AR-type stock. The stock has raised ridges on the rear surface, a hole on the underside consistent with an AR-type stock locking pin and the same basic outline and dimensions as many other AR-type rifle stocks.

Additionally, there are two holes running lengthwise of the stock shell that are consistent with other stocks designed with two rods for attachment as opposed to a single buffer tube.

The addition of the ACE wrist support and Velcro does not cause the characteristics of the stock to be disregarded. The same ACE wrist support could be attached to any other AR-type stock and not change their classification as stocks; nor would *intending* to use a stock as a stabilizing brace change the classification of the stock.

Based on our evaluation, FTISB finds that the submitted "Strike Industries Stabilizer" is a shoulder stock. Therefore, attaching the submitted sample to a pistol, with a barrel of less than 16 inches in length, would result in the firearm being classified as a "short-barreled rifle" as defined in the GCA, 18 U.S.C. § 921(a)(8) and a "firearm" as defined in the NFA, 26 U.S.C. § 5845(a)(3). Further, mere possession of the stock with a compatible firearm containing a barrel of less than 16 inches in length would constitute possession of an NFA firearm.

To facilitate return of the submitted sample, please provide FTISB with an appropriate FedEx or similar account number within 60 days of receipt of this letter.

We trust that the foregoing has been responsive to your request for an evaluation. If we can be of any further assistance, please contact us.

Sincerely yours,

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Chief, Firearms Technology Industry Services Branch

Enclosure

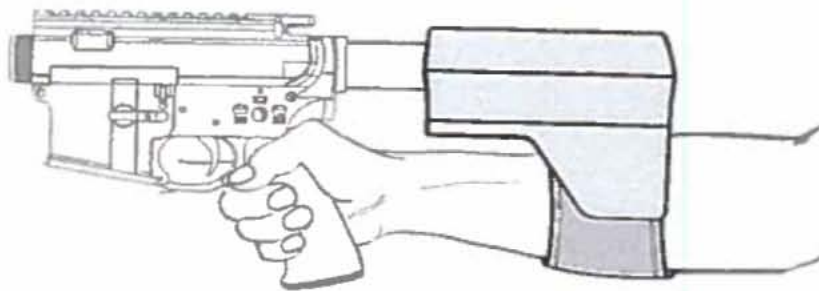
Strike Industries Stabilizer

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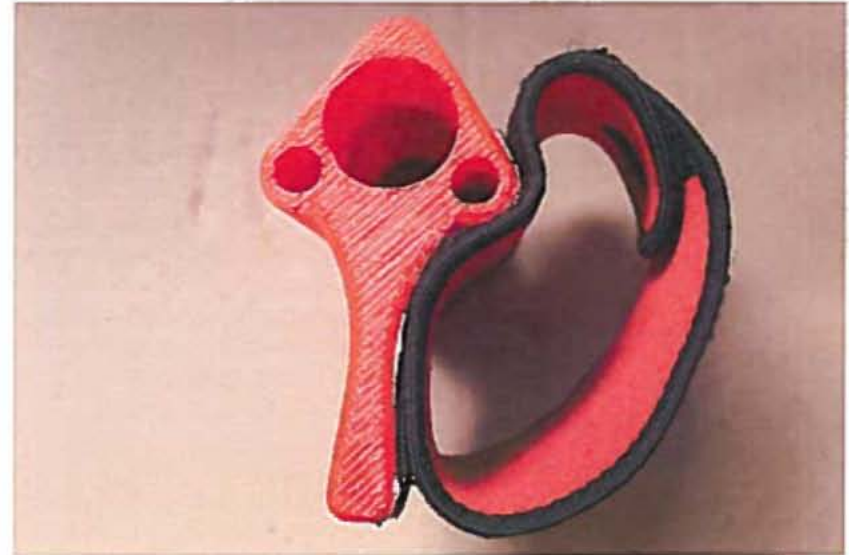
Side view of components included in the Strike Industries Stabilizer



Stated purpose is to “increase safety, stability, and control during one-handed operation of AR and variant pistol designs.”

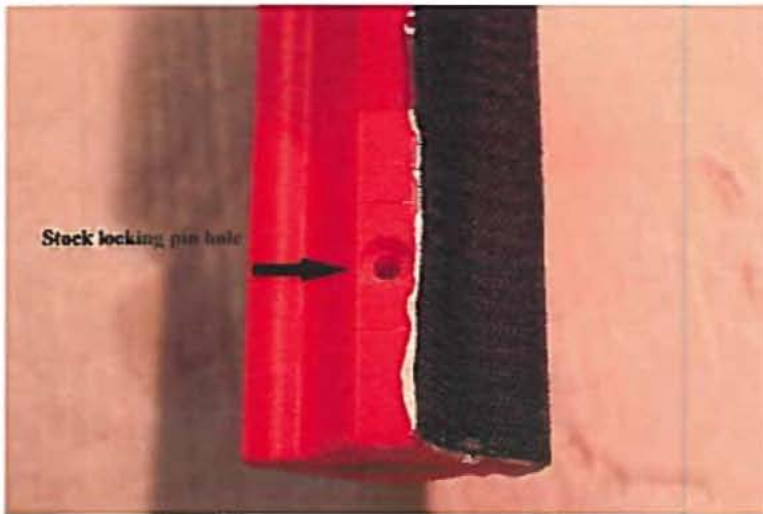


Front and rear views with ace wrist support attached.

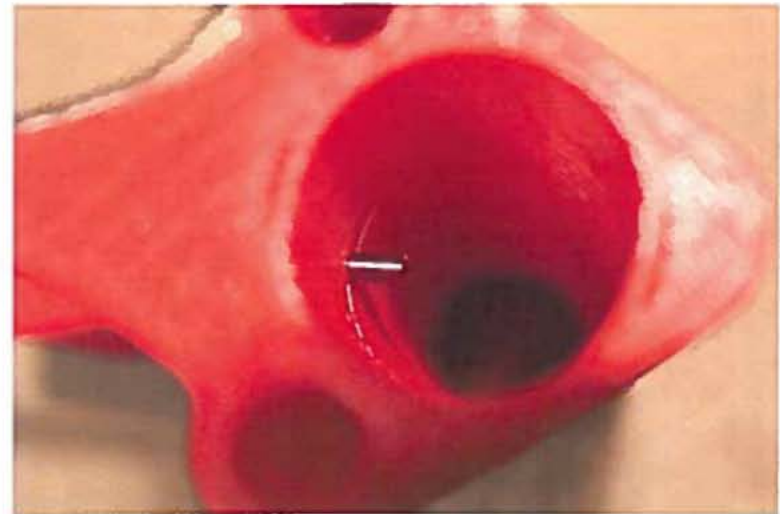


Locking pin hole from outside and inside (with punch inserted)

Locking pin hole (outside)



Locking pin hole (inside)



Comparison of stock profiles



Two longitudinal holes for rods

Two holes for rod-type stock



Other similar style stock

